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## **REMEDIATION SUMMARY & SITE CLOSURE REQUEST**

**BOPCO, LP  
G.H. Cobb Federal #1  
Eddy County, New Mexico  
Unit Letter "M" (SW/SW), Section 23, Township 20 South, Range 31 East  
Latitude 32° 33' 11.412" North, Longitude 103° 50' 44.304"  
NMOCD Reference #2RP-369**

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## **1.0 INTRODUCTION AND BACKGROUND INFORMATION**

Basin Environmental Service Technologies, LLC (Basin Environmental), on behalf of BOPCO, LP (BOPCO), has prepared this *Remediation Summary & Site Closure Request* for the site known as G.H. Cobb Federal #1: a permanent, unlined pit. The legal description of the site is Unit Letter "M" (SW/SW), Section 23, Township 20 South, Range 31 East, in Eddy County, New Mexico. The property is owned and administered by the United States Department of the Interior, Bureau of Land Management (BLM). The geographic coordinates of the site are 32° 33' 11.412" North latitude and 103° 50' 44.304" West longitude. Please reference Figure 1 for a "Site Location Map".

On July 1, 2009, BOPCO submitted a "Pit, Closed-Loop System, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application" (Form C-144) to the New Mexico Oil Conservation Division (NMOCD). The Form C-144 is provided as Appendix A.

On November 13, 2009, BOPCO requested Basin Environmental assume remediation oversight of the G.H. Cobb Federal #1 site.

On November 20, 2009, representatives of BOPCO and Basin Environmental met with a representative of the NMOCD Artesia District Office to discuss remediation activities to be conducted at the site. The pit was to be excavated to approximately ten feet (10') below the surface of the pit, to a total depth of approximately thirty-five feet (35') below ground surface (bgs). Due to safety issues associated with the depth of the existing excavation, it was decided that a six-inch (6") inch PVC conduit would be cemented in the floor of the excavation and extended to approximately fifteen feet (15') bgs. The excavation would then be backfilled around the conduit, which would allow drilling activities to be conducted in the floor of the excavation.

On December 7, 2009, BOPCO submitted a Release Notification and Corrective Action (Form C-141) to the NMOCD and notified the BLM of its intent to commence pit closure activities at the G.H. Cobb Federal #1 site. The Form C-141 is provided as Appendix B. General photographs of the site are provided as Appendix C.

## **2.0 NMOCD SITE CLASSIFICATION**

A search of the New Mexico Water Rights Reporting System (NMWRRS) database maintained by the New Mexico Office of the State Engineer (NMOSE) indicated information was unavailable for Section 23, Township 20 South, Range 31 East. A depth to groundwater reference map utilized by the NMOCD indicates groundwater should be encountered at approximately seventy-five feet (75') bgs. BOPCO installed six (6) monitor wells on-site, which indicate the average depth to groundwater is approximately seventy feet (70') bgs. Laboratory analytical results from soil samples collected during the installation of monitor well MW-2 indicated chloride concentrations exceeded NMOCD regulatory standards within fifty feet (50') of groundwater. The depth of chloride impact results in a score of twenty (20) points being assigned to the site based on the NMOCD depth-to-groundwater criterion.

A search of the NMWRRS database indicated there are no water wells within one thousand feet (1,000') of the release. Based on the NMOCD ranking system, zero (0) points will be assigned to the site as a result of this criterion.

There are no surface water bodies within one thousand feet (1,000') of the release. Based on the NMOCD ranking system, zero (0) points will be assigned to the site as a result of this criterion.

NMOCD guidelines indicate the G.H. Cobb Federal #1 site has an initial ranking score of twenty (20) points. The soil remediation levels for a site with a ranking score of twenty (20) points are as follows:

- Benzene – 10 mg/kg (ppm)
- Benzene, toluene, ethyl-benzene, and total xylene (BTEX) – 50 mg/kg (ppm)
- Total Petroleum Hydrocarbons (TPH) – 100 mg/kg (ppm)

The New Mexico Administrative Code (NMAC) does not currently specify a remediation level for chloride concentrations in soil. Chloride remediation levels are set by the NMOCD on a site-specific basis.

### **3.0 DISTRIBUTION OF CONTAMINANTS IN THE UNSATURATED ZONE**

#### **3.1 Summary of Soil Remediation Activities**

On November 13, 2009, remediation activities commenced at the site. A fence was constructed around the existing excavation for the protection of livestock in the area.

On November 25, 2009, a six-inch (6") PVC conduit was installed in the floor of the excavation to facilitate drilling activities. The area of the excavation around the conduit was backfilled to accommodate a drilling rig.

On December 8, 2009, excavation of impacted soil commenced at the site. From December 8 through December 10, 2009, excavated soil was placed in the floor of the excavation, leveled and compacted to accommodate a drilling rig.

From December 30, 2009, through January 15, 2010, thirteen (13) soil borings (SB-1 through SB-13) were advanced to investigate the vertical and horizontal extent of impact at the site. Soil samples were collected at five-foot (5') drilling intervals and field-screened using a Photo-Ionization Detector (PID) and/or chloride test kit. Selected soil samples were submitted to Cardinal Laboratories (Hobbs, New Mexico) for analysis of benzene, toluene, ethylbenzene, and total xylenes (BTEX), total petroleum hydrocarbons (TPH), and/or chloride using EPA Methods SW-846 8021b, SW-846 8015M, and 4500 Cl-B, respectively. Selected soil samples were also analyzed for concentrations of potassium, arsenic, and magnesium using EPA Method SW846 6010B. Table 1 summarizes the "Concentrations of BTEX, TPH & Chloride in Soil", and Table 2 summarizes the "Concentrations of Potassium, Arsenic & Magnesium in Soil". A stratigraphic cross-section is provided as Figure 3. Soil boring and monitor well logs are provided as Appendix D. Laboratory analytical reports are provided as Appendix E.

Soil Boring SB-1 was advanced approximately seventy feet (70') to the south of the excavation. The soil boring was advanced to a total depth of approximately ninety feet (90') bgs. Groundwater was encountered at approximately seventy-four feet (74') bgs. Soil samples collected at the ground surface and 5', 15', 25', 35', 45', 55', 60', 65', 70', 75', 80', 85', and 90' bgs

were submitted to the laboratory for analysis of chloride, TPH, BTEX, and/or metal concentrations. Laboratory analytical results indicated chloride concentrations ranged from 64.0 mg/kg in soil sample SB-1 @ 55' to 8,200 mg/kg in soil sample SB-1 @ 65'. TPH concentrations were less than the laboratory method detection limit (MDL) in all soil samples submitted, with the exception of soil sample SB-1 @ 25', which exhibited a concentration of 40.3 mg/kg. Potassium concentrations ranged from 459 mg/kg in soil sample SB-1 @ 60' to 2,150 in soil sample SB-1 @ 75'. Arsenic concentrations were less than the laboratory MDL in all submitted soil samples, with the exception of soil sample SB-1 @ 75', which exhibited an arsenic concentration of 7.20 mg/kg. Magnesium concentrations ranged from 3,340 mg/kg in soil sample SB-1 @ 60' to 12,200 mg/kg in soil sample SB-1 @ 75'.

Soil boring SB-1 was converted to monitor well MW-1 and fitted with a two-inch (2") diameter, screened PVC riser, J-plug, and a locking, steel monument.

Soil Boring SB-2 was advanced through the conduit in the floor of the excavation at approximately twenty-nine feet (29') bgs. The soil boring was advanced to a total depth of approximately ninety feet (90') bgs. Groundwater was encountered at approximately fifty-eight feet (58') bgs. Soil samples collected on the floor of the excavation (Surface) and drilling depths of 34', 44', 54', 64', 69', 74', 79', 84', and 89' bgs were submitted to the laboratory for analysis of chloride and/or metal concentrations. The soil sample collected at 34' bgs (soil sample SB-2 @ 5') was also analyzed for BTEX and TPH constituent concentrations. Laboratory analytical results indicated chloride concentrations ranged from 1,300 mg/kg in the soil sample collected at 89' bgs (soil sample SB-2 @ 60') to 15,400 mg/kg in the soil sample collected at 64' bgs (soil sample SB-2 @ 35'). Potassium concentrations ranged from 684 mg/kg in the soil sample collected at 74' bgs (soil sample SB-2 @ 45') to 1,330 mg/kg in the soil sample collected at 69' bgs (soil sample SB-2 @ 40'). Arsenic concentrations ranged from less than the laboratory MDL in the soil samples collected at 34', 64', and 74' bgs (soil samples SB-2 @ 5', SB-2 @ 35', and SB-2 @ 45', respectively) to 16.0 mg/kg in the soil sample collected at 69' bgs (soil sample SB-2 @ 40'). Magnesium concentrations ranged from 3,170 mg/kg in soil SB-2 @ Surface to 18,800 mg/kg in the soil sample collected at 69' bgs (soil sample SB-2 @ 40'). BTEX constituent concentrations in the soil sample collected at 34' bgs (soil sample SB-2 @ 5') were less than the appropriate laboratory MDL, and the TPH concentration was 15.6 mg/kg.

Soil boring SB-2 was converted to monitor well MW-2 and fitted with a two-inch (2") diameter, screened PVC riser, J-plug, and a locking, steel monument.

Soil boring SB-3 was advanced in the northern portion of the excavation at approximately fifteen feet (15') bgs. The soil boring was advanced to a total depth of approximately seventy-five feet (75') bgs. Soil samples collected on the floor of the excavation (Surface) and drilling depths of 20', 30', 40', 50', 55', 60', 65', 70', and 75' bgs were submitted to the laboratory for analysis of chloride and/or metal concentrations. The soil sample collected at 20' bgs (Soil Sample SB-3 @ 5') was also analyzed for BTEX and TPH constituent concentrations. Laboratory analytical results indicated chloride concentrations ranged from 384 mg/kg in the soil sample collected at 30' bgs (soil sample SB-3 @ 15') to 12,000 mg/kg in the soil sample collected at 55' bgs (soil sample SB-3 @ 40'). Potassium concentrations ranged from 455 mg/kg in the soil sample collected at 20' bgs (soil sample SB-3 @ 5') to 1,990 mg/kg in the soil sample collected at 75' bgs (soil sample SB-3 @ 60'). Arsenic concentrations ranged from less than the laboratory MDL in the soil samples collected on the floor of the excavation, 20' bgs, and 65' bgs (soil samples SB-

3 @ Surface, SB-3 @ 5', and SB-3 @ 65', respectively) to 13.9 mg/kg in the soil sample collected at 75' bgs (soil sample SB-3 @ 60'). Magnesium concentrations ranged from 4,150 mg/kg in the soil sample collected at 20' bgs (soil sample SB-3 @ 5') to 16,600 mg/kg in the soil sample collected at 75' bgs (soil sample SB-3 @ 60'). BTEX constituent concentrations in the soil sample collected at 20' bgs (soil sample SB-3 @ 5') were less than the appropriate laboratory MDL, and the TPH concentration was 14.8 mg/kg.

Soil boring SB-4 was advanced approximately one hundred and ten feet (110') to the west of the excavation. The soil boring was advanced to a total depth of approximately seventy-five feet (75') bgs. Soil samples collected at 5', 15', 25', 30', 35', 45', 55', 60', 65', 70', and 75' bgs were submitted to the laboratory for analysis of chloride and/or metal concentrations. Soil sample SB-4 @ 5' was also analyzed for BTEX and TPH constituent concentrations. Laboratory analytical results indicated chloride concentrations ranged from 128 mg/kg in soil sample SB-4 @ 5' to 14,400 mg/kg in soil sample SB-4 @ 70'. Potassium concentrations ranged from 452 mg/kg in soil sample SB-4 @ 25' to 1,420 mg/kg in soil sample SB-4 @ 65'. Arsenic concentrations ranged from less than the laboratory MDL in soil sample SB-4 @ 60' to 14.3 mg/kg in soil sample SB-4 @ 75'. Magnesium concentrations ranged from 3,660 mg/kg in soil sample SB-4 @ 25' to 18,400 mg/kg in soil sample SB-4 @ 65'. BTEX constituent concentrations in soil sample SB-4 @ 5' were less than the appropriate laboratory MDL, and the TPH concentration was 16.6 mg/kg.

Soil boring SB-5 was advanced approximately twenty-five feet (25') to the east of the excavation. The soil boring was advanced to a total depth of approximately eighty feet (80') bgs. Soil samples collected at 5', 15', 25', 35', 45', 55', 65', 70', 75', and 80' bgs were submitted to the laboratory for analysis of chloride and/or metal concentrations. Soil sample SB-5 @ 5' bgs was also analyzed for BTEX and TPH constituent concentrations. Laboratory analytical results indicated chloride concentrations ranged from 560 mg/kg in soil sample SB-5 @ 15' to 18,600 mg/kg in soil sample SB-5 @ 80'. Potassium concentrations ranged from 630 mg/kg in soil sample SB-5 @ 75' to 1,290 mg/kg in soil sample SB-5 @ 70'. Arsenic concentrations were less than the laboratory MDL in all submitted soil samples, with the exception of soil sample SB-5 @ 70', which exhibited an arsenic concentration of 15.1 mg/kg. Magnesium concentrations ranged from 3,260 mg/kg in soil sample SB-5 @ 75' to 18,100 mg/kg in soil sample SB-5 @ 70'. BTEX constituent concentrations in soil sample SB-5 @ 5' were less than the appropriate laboratory MDL, and the TPH concentration was 17.2 mg/kg.

Soil boring SB-6 was advanced approximately fifty feet (50') north of the excavation. The soil boring was advanced to a total depth of approximately seventy feet (70') bgs. Soil samples collected at 5', 15', 25', 35', 45', 55', 60', 65', and 70' bgs were submitted to the laboratory for analysis of chloride and/or metal concentrations. Soil sample SB-6 @ 5' was also analyzed for BTEX and TPH constituent concentrations. Laboratory analytical results indicated chloride concentrations ranged from 304 mg/kg in soil sample SB-6 @ 15' to 13,400 mg/kg in soil sample SB-6 @ 65'. Potassium concentrations ranged from 748 mg/kg in soil sample SB-6 @ 70' to 1,570 mg/kg in soil sample SB-6 @ 60'. Arsenic concentrations were less than the laboratory MDL in all submitted soil samples, with the exception of soil sample SB-6 @ 65', which exhibited an arsenic concentration of 10.4 mg/kg. Magnesium concentrations ranged from 2,870 mg/kg in soil sample SB-6 @ 70' to 18,000 mg/kg in soil sample SB-6 @ 35'. BTEX and TPH constituent concentrations in soil sample SB-6 @ 5' were less than the appropriate laboratory MDL.

Soil boring SB-7 was advanced approximately one hundred and forty-five feet (145') to the west of the excavation. The soil boring was advanced to a total depth of approximately seventy-five feet (75') bgs. Soil samples collected at 5', 15', 25', 30', 35', 45', 55', 60', 65', 70', and 75' bgs were submitted to the laboratory for analysis of chloride concentrations. Soil sample SB-7 @ 5' was also analyzed for BTEX and TPH constituent concentrations. Laboratory analytical results indicated chloride concentrations ranged from 32.0 mg/kg in soil sample SB-7 @ 5' to 12,400 mg/kg in soil sample SB-7 @ 75'. BTEX and TPH constituent concentrations in soil sample SB-7 @ 5' were less than the appropriate laboratory MDL.

Soil boring SB-8 was advanced approximately three hundred and eighty feet (380') to the south of the excavation. The soil boring was advanced to a total depth of approximately one hundred and five feet (105') bgs. Groundwater was not encountered during advancement of the soil boring. However, groundwater was encountered at approximately ninety-four feet (94') bgs on a subsequent site visit on January 26, 2010. Soil samples collected at 5', 15', 25', 35', 45', 55', 65', 75', 80', and 85' bgs were submitted to the laboratory for analysis of chloride concentrations. Soil sample SB-8 @ 5' was also analyzed for BTEX and TPH constituent concentrations. Laboratory analytical results indicated chloride concentrations ranged from 32.0 mg/kg in soil samples SB-8 @ 55', SB-8 @ 65', and SB-8 @ 75' to 560 mg/kg in soil sample SB-8 @ 5'. BTEX and TPH constituent concentrations in soil sample SB-8 @ 5' were less than the appropriate laboratory MDL.

Soil boring SB-8 was converted to monitor well MW-3 and fitted with a two-inch (2") diameter, screened PVC riser, J-plug, and a locking, steel monument.

Soil boring SB-9 was advanced approximately twenty-five feet (25') to the south of the excavation. The soil boring was advanced to a total depth of approximately twenty feet (20') bgs. Soil samples collected at 5', 15', and 20' bgs were submitted to the laboratory for analysis of chloride concentrations. Soil sample SB-9 @ 5' was also analyzed for BTEX and TPH constituent concentrations. Laboratory analytical results indicated chloride concentrations ranged from 144 mg/kg in soil sample SB-9 @ 15' to 1,140 mg/kg in soil sample SB-9 @ 5'. BTEX and TPH constituent concentrations in soil sample SB-9 @ 5' were less than the appropriate laboratory MDL.

Soil boring SB-10 was advanced approximately ten feet (10') to the east of the excavation. The soil boring was advanced to a total depth of approximately twenty feet (20') bgs. Soil samples collected at 5', 15', and 20' bgs were submitted to the laboratory for analysis of chloride concentrations. Soil sample SB-10 @ 5' was also analyzed for BTEX and TPH constituent concentrations. Laboratory analytical results indicated chloride concentrations ranged from 224 mg/kg in soil sample SB-10 @ 15' to 1,360 mg/kg in soil sample SB-10 @ 5'. BTEX constituent concentrations in soil sample SB-10 @ 5' were less than the appropriate laboratory MDL, and the TPH concentration was 42.7 mg/kg.

Soil boring SB-11 was advanced approximately two hundred and fifty feet (250') to the west of the excavation. The soil boring was advanced to a total depth of approximately ninety feet (90') bgs. Groundwater was encountered at approximately sixty-nine feet (69') bgs. Soil samples collected at 5', 15', 25', 35', 45', 55', 65', 70', 75', and 80' bgs were submitted to the laboratory for analysis of chloride concentrations. Soil sample SB-11 @ 5' was also analyzed for BTEX and TPH constituent concentrations. Laboratory analytical results indicated chloride concentrations

ranged from 16.0 mg/kg in soil sample SB-11 @ 5' to 7,000 mg/kg in soil sample SB-11 @ 70'. BTEX and TPH constituent concentrations in soil sample SB-11 @ 5' were less than the appropriate laboratory MDL.

Soil boring SB-11 was converted to monitor well MW-4 and fitted with a two-inch (2") diameter, screened PVC riser, J-plug, and a locking, steel monument.

Soil boring SB-12 was advanced approximately two hundred and eighty feet (280') to the north of the excavation. The soil boring was advanced to a total depth of approximately ninety feet (90') bgs. Groundwater was encountered at approximately sixty-eight feet (68') bgs. Soil samples collected at 5', 15', 25', 35', 45', 55', 65', 75', 80', 85', and 90' bgs were submitted to the laboratory for analysis of chloride concentrations. Soil sample SB-12 @ 5' was also analyzed for BTEX and TPH constituent concentrations. Laboratory analytical results indicated chloride concentrations ranged from 48.0 mg/kg in soil samples SB-12 @ 5' and SB-12 @ 35' to 5,680 mg/kg in soil sample SB-12 @ 80'. BTEX and TPH constituent concentrations in soil sample SB-12 @ 5' were less than the appropriate laboratory MDL.

Soil boring SB-12 was converted to monitor well MW-5 and fitted with a two-inch (2") diameter, screened PVC riser, J-plug, and a locking, steel monument.

Soil boring SB-13 was advanced approximately sixty (60') to the west of the excavation. The soil boring was advanced to a total depth of approximately ninety-five feet (95') bgs. Groundwater was encountered at approximately seventy-five feet (75') bgs. Soil samples collected at 5', 15', 25', 35', 45', 55', 65', 75', 85', and 95' bgs were submitted to the laboratory for analysis of chloride concentrations. Soil sample SB-13 @ 5' was also analyzed for BTEX and TPH constituent concentrations. Laboratory analytical results indicated chloride concentrations ranged from 32.0 mg/kg in soil samples SB-13 @ 55', SB-13 @ 65', and SB-13 @ 95' to 144 mg/kg in soil sample SB-13 @ 5'. BTEX and TPH constituent concentrations in soil sample SB-13 @ 5' were less than the appropriate laboratory MDL.

Soil boring SB-13 was converted to monitor well MW-6 and fitted with a two-inch (2") diameter, screened PVC riser, J-plug, and a locking, steel monument.

On January 8, 2010, nine (9) soil samples (Northwest S/W @ 10', Northeast S/W @ 10', West S/W @ 10', East S/W @ 10', South S/W @ 10', Northwest Corner @ 10', Northeast Corner @ 10', Southwest Corner @ 10', and Southeast Corner @ 10') were collected from the sidewalls of the excavation and submitted to the laboratory for analysis of BTEX, TPH, and chloride concentrations. Laboratory analytical results indicated BTEX and TPH constituent concentrations were less than the appropriate laboratory MDL in all soil samples submitted. Chloride concentrations ranged from 192 mg/kg in soil sample Northwest Corner @ 10' to 9,900 mg/kg in soil sample East S/W @ 10'.

Analytical results from soil borings advanced to the south and the east of the excavation (SB-9 and SB-10) indicated chloride concentrations within the soil column are less than 250 mg/kg at 20 feet bgs. The excavation was advanced in the areas represented by soil samples Northeast S/W @ 10', West S/W @ 10', and Southeast Corner @ 10'. Further excavation to the south and east was deemed impracticable due to the proximity of a widely used oilfield access road and active oilfield production facilities.

On January 18, 2010, Basin Environmental resumed excavation activities on the west sidewall and the northwest and southeast corners of the excavation. Excavated soil was placed in the excavation and leveled.

On February 2, 2010, Basin Environmental began excavation of the east sidewall. From February 2 through February 10, 2010, excavated soil from the east, north, and south sidewalls was placed in the excavation and leveled.

On February 11, 2010, three (3) soil samples (West S/W A @ 10', Southeast Corner A @ 10', and Northwest Corner A @ 10') were collected from the sidewalls of the excavation and submitted to the laboratory for analysis of chloride concentrations. Laboratory analytical results indicated chloride concentrations were less than the NMOCD-approved level of 1,000 mg/kg in all soil samples submitted. Chloride concentrations ranged from 672 mg/kg in soil sample West S/W A @ 10' to 1,060 mg/kg in soil sample Southwest Corner A @ 10'.

From July 14 through July 16, 2010, clean caliche was loaded, transported, and stockpiled on-site for use as backfill material, pending NMOCD approval.

In December 2010, Basin Environmental, on behalf of BOPCO, prepared and submitted a *Remediation Summary and Site Closure Strategy* to the NMOCD Santa Fe District Office summarizing the above-referenced activities and detailing a strategy to advance the G.H. Cobb Federal #1 site to an NMOCD-approved closure.

Based on laboratory analytical results, and with NMOCD approval, from March 30 through April 28, 2011, the excavation was backfilled in eighteen-inch (18") lifts with non-impacted material, compacted, and contoured to fit the surrounding topography. Prior to backfilling, the PVC casing of monitor well MW-2 was extended above ground surface, and a twenty (20) mil polyurethane liner was installed in the floor of the excavation at approximately ten feet (10') to twelve feet (12') bgs. Approximately one foot (1') of non-impacted pad sand was installed both above and below the liner to protect the liner from damage during installation and backfilling activities.

Final dimensions of the excavation were approximately one hundred and fifty-five feet (155') in width, one hundred and sixty-one feet (161') in length, and approximately thirty-five feet (35') in depth.

On August 17, 2011, the G.H. Cobb Federal #1 site was seeded with a BLM-approved seed mixture (BLM #2).

In September 2011, Basin Environmental, on behalf of BOPCO, prepared and submitted a *Remediation Summary & Soil Closure Request*, summarizing the above-referenced soil remediation activities and requesting soil closure status for the G.H. Cobb Federal #1 site.

## **4.0 DISTRIBUTION OF CONTAMINANTS IN THE SATURATED ZONE**

### **4.1 Site Characteristics and Background Information**

A search of the New Mexico Office of the State Engineer's database indicates that there are no registered water wells in any of the sections adjacent to the G.H. Cobb Federal #1. According to information obtained from the New Mexico Environment Department – Drinking Water Bureau, none of the six (6) active public water systems in the area obtain their drinking water locally. The Intrepid Potash North mining facility, located 1.5 miles northeast of the site, obtains its drinking water from wells located approximately forty (40) miles east of the mine in Buckeye, New Mexico. B&B Half Way Bar & Grill, a nearby eatery, hauls its drinking water from Carlsbad, New Mexico.

G.H. Cobb Federal #1 is located within the Permian Rustler Formation in an area that could be described as “karst”. The remediation site is located in close proximity to three active potash mining facilities, two NMOCD permitted landfills, a nuclear waste repository, and several naturally occurring salt lakes. An Environmental Impact Statement (EIS) obtained from Intrepid Potash, dated March 2010, proposes the use of groundwater extracted from the Rustler Formation to conduct in-situ solution mining within inactive mine workings approximately five (5) miles to the west of the site. Intrepid has indicated that brine water extracted from certain areas within the Rustler Formation is of particular value for in-situ solution mining, as it forms an advantageous injectate solution and is not suitable for human consumption or use in agriculture.

Brine water aquifers are not uncommon in the region. In a publication released by the New Mexico Geological Society in 2006, *Caves and Karst of Southeastern New Mexico*, Carol Hill describes brine and fresh water intermingling in an area south of G.H. Cobb Federal #1. Laboratory analytical results from groundwater extracted from monitor wells installed in the vicinity of the Waste Isolation Pilot Plant (WIPP) indicate chloride concentrations range from 2,800 to 29,000 mg/L within a one square mile radius (Hill 2006). Hydrology within the area is further complicated due to lateral and horizontal variations in lithologies, the potential for subterranean saline springs, and the occurrence of fractured and brecciated strata, which can create a complex system of fresh and saline water paths.

### **4.2 Summary of Quarterly Groundwater Monitoring Activities**

Quarterly groundwater monitoring events were conducted from the first quarter of 2010 (January 26, 2010) through the second quarter of 2013 (April 11, 2013), to assess the levels and extent of dissolved-phase constituents. The groundwater monitoring events consisted of measuring static water levels in the six (6) on-site monitor wells (MW-1 through MW-6), checking for the presence of PSH, and purging and sampling of each well exhibiting sufficient recharge. The monitor wells were purged using an electrical Grundfos pump or disposable Teflon bailer of a minimum of three (3) well volumes of water, or until the wells were dry. Groundwater was allowed to recharge, and samples were obtained using clean, disposable Teflon bailers. Water samples were stored in clean, plastic or glass containers provided by the laboratory and placed on ice in the field. Purge water was collected in a trailer-mounted polystyrene tank and disposed of at an NMOCD-approved disposal facility near Monument, New Mexico.

No PSH was detected in the on-site monitor wells during any of the quarterly monitoring events.

Locations of groundwater monitoring wells and the inferred groundwater gradient, which was constructed from groundwater elevation measurements collected during the most recent sampling events (February 7 and April 11, 2013), are depicted in Figures 2A and 2B, "Inferred Groundwater Gradient Map – 1Q2013" and "Inferred Groundwater Gradient Map – 2Q2013", respectively. Groundwater was observed at depths ranging from 68 to 82 feet bgs in the on-site monitor wells, and the groundwater gradient maps indicate a general gradient of approximately 0.007 feet/foot to the northwest, as measured between monitor wells MW-3 and MW-4. Groundwater elevation data is provided as Table 3, "Groundwater Elevation Data".

### **4.3 Quarterly Monitoring Data**

Data collected during the quarterly groundwater monitoring events is summarized below. The six (6) on-site monitor wells were sampled on January 26, June 3, September 17, and December 15, 2010; March 3, June 8, August 31, and November 15, 2011; February 10, May 21, August 21, and October 15, 2012; and February 7 and April 11, 2013. Groundwater samples collected from the on-site monitor wells during the quarterly sampling events were delivered to Cardinal Laboratories in Hobbs, New Mexico, for determination of chloride concentrations using EPA Method 4500 CL-B. In addition to chloride, the quarterly groundwater samples collected on January 26, 2010, were also analyzed for total dissolved solid (TDS) concentrations using EPA Method 160.1, and the quarterly sample collected on April 11, 2013, was analyzed for BTEX concentrations using EPA Method SW846-8021b.

A "special purpose" water sample was collected from an on-site produced water storage tank during the January 26, 2010, quarterly sampling event. The groundwater sample was submitted to the laboratory for analysis of chloride concentrations using EPA Method 4500 Cl-B and potassium, arsenic, and magnesium concentrations using EPA Method 600/4-91/010.

Pursuant to an NMOCD request, "special purpose" water samples were collected from monitor well MW-2 and the on-site produced water storage tank on March 24, 2010. The groundwater samples were submitted to Xenco Laboratories in Odessa, Texas, for analysis of BTEX and Toxicity Characteristic Leaching Procedure (TCLP) heavy metal concentrations using EPA Methods SW846-8021b (BTEX), SW846 6010B (TCLP metals), and SW7470A (TCLP mercury).

Laboratory analytical results were compared to NMOCD regulatory limits based on New Mexico groundwater standards found in Section 20.6.2.3103 of the New Mexico Administrative Code (NMAC). Table 4 summarizes the "Concentrations of Chloride in Groundwater", and Table 5 summarizes the "Concentrations of BTEX, Metals & TDS in Groundwater". Groundwater contaminant concentrations for the most recent sampling events (February 7 and April 11, 2013) are depicted in Figures 5A and 5B, "Groundwater Concentration Map - 1Q2013" and "Groundwater Concentration Map - 2Q2013", respectively.

#### **Monitor Well MW-1**

Laboratory analytical results indicated chloride concentrations in monitor well MW-1 ranged from 13,700 mg/L on April 11, 2013, to 46,000 mg/L on June 3, 2010. Chloride concentrations

exceeded the New Mexico Water Quality Control Commission (NMWQCC) regulatory standard of 250 mg/L in all submitted groundwater samples.

The TDS concentration in the groundwater sample collected on January 26, 2010, was 63,200 mg/L, which exceeded the NMWQCC regulatory standard of 1,000 mg/L.

#### **Monitor Well MW-2**

Laboratory analytical results indicated chloride concentrations in monitor well MW-2 ranged from 109,000 mg/L on August 21, 2012, to 142,000 mg/L on December 15, 2010. Chloride concentrations exceeded the NMWQCC regulatory standard of 250 mg/L in all submitted groundwater samples.

Benzene concentrations ranged from 0.0208 mg/L on March 24, 2010, to 0.005 mg/L on April 11, 2013. Toluene concentrations ranged from less than the laboratory MDL on March 24, 2010, to 0.004 mg/L on April 11, 2013. Total xylene concentrations ranged from less than the laboratory MDL on April 11, 2013, to 0.0432 mg/L on March 24, 2010. Benzene concentrations exceeded the NMWQCC regulatory standard of 0.010 mg/L on March 24, 2010. Toluene and ethylbenzene concentrations were less than the NMWQCC regulatory standard of 0.75 mg/L in all submitted groundwater samples. Total xylene concentrations were less than the NMWQCC regulatory standard of 0.62 mg/L in all submitted groundwater samples.

TCLP metal concentrations in the groundwater sample collected on March 24, 2010, were less than the appropriate laboratory MDL, with the exception of barium, which exhibited a concentration of 1.43 mg/L. All TCLP metal concentrations were less than the appropriate NMWQCC regulatory standard.

The TDS concentration in the groundwater sample collected on January 26, 2010, was 215,000 mg/L, which exceeded the NMWQCC regulatory standard of 1,000 mg/L.

#### **Monitor Well MW-3**

Laboratory analytical results indicated chloride concentrations in monitor well MW-3 ranged from 124 mg/L on January 26, 2010, to 228 mg/L on June 8, 2011. Chloride concentrations were less than the NMWQCC regulatory standard of 250 mg/L in all submitted groundwater samples.

The TDS concentration in the groundwater sample collected on January 26, 2010, was 773 mg/L, which was less than the NMWQCC regulatory standard of 1,000 mg/L.

#### **Monitor Well MW-4**

Laboratory analytical results indicated chloride concentrations in monitor well MW-4 ranged from 45,000 mg/L on May 21, 2012, to 54,000 mg/L on November 15, 2011. Chloride concentrations exceeded the NMWQCC regulatory standard of 250 mg/L in all submitted groundwater samples.

The TDS concentration in the groundwater sample collected on January 26, 2010, was 72,500 mg/L, which exceeded the NMWQCC regulatory standard of 1,000 mg/L.

### **Monitor Well MW-5**

Laboratory analytical results indicated chloride concentrations in monitor well MW-5 ranged from 21,200 mg/L on August 21, 2012, to 98,000 mg/L on June 8, 2011. Chloride concentrations exceeded the NMWQCC regulatory standard of 250 mg/L in all submitted groundwater samples.

The TDS concentration in the groundwater sample collected on January 26, 2010, was 118,000 mg/L, which exceeded the NMWQCC regulatory standard of 1,000 mg/L.

### **Monitor Well MW-6**

Laboratory analytical results indicated chloride concentrations in monitor well MW-6 ranged from 424 mg/L on January 26, 2010, to 540 mg/L on August 31, 2011. Chloride concentrations exceeded the NMWQCC regulatory standard of 250 mg/L in all submitted groundwater samples.

The TDS concentration in the groundwater sample collected on January 26, 2010, was 1,440 mg/L, which exceeded the NMWQCC regulatory standard of 1,000 mg/L.

### **Produced Water**

The chloride concentration in the groundwater sample collected on January 26, 2010, was 170,000 mg/L, which exceeded the NMWQCC regulatory standard of 250 mg/L. The potassium concentration was 1,500 mg/L, the arsenic concentration was 2.50 mg/L, and the magnesium concentration was 3,630 mg/L. The arsenic concentration exceeded the NMWQCC regulatory standard of 0.1 mg/L. There is currently no regulatory standard for potassium or magnesium in groundwater.

The benzene concentration in the groundwater sample collected on March 24, 2010, was 0.0798 mg/L, and the ethylbenzene concentration was 0.1028 mg/L. The benzene concentration exceeded the NMWQCC regulatory standard of 0.010 mg/L. The ethylbenzene concentration was less than the NMWQCC regulatory standard of 0.75 mg/L. Toluene and total xylene concentrations were both less than the appropriate laboratory MDL and less than NMWQCC regulatory standards.

TCLP metal concentrations in the groundwater sample collected on March 24, 2010, were less than the appropriate laboratory MDL, with the exception of barium, which exhibited a concentration of 2.06 mg/L. All TCLP metal concentrations were less than NMWQCC regulatory standards.

## **4.4 Groundwater Closure Request**

The area immediately around/adjacent to the G.H. Cobb Federal #1 site has been designated for the installation of a well pad to accommodate a large-scale directional drilling "Island Project". Up to forty (40) exploratory wellbores are scheduled to be drilled in the area over the next several years, and the footprint of the planned well pad will encompass the G.H. Cobb Federal #1 excavation and the six (6) on-site monitor wells. Construction on the well pad is scheduled to begin in the third quarter of 2013.

Due to environmental and safety concerns associated with the “Island Project”, which is scheduled to continue through at least calendar year 2020, BOPCO hereby requests permission to cease groundwater remediation activities at the G.H. Cobb Federal #1 site and to plug and abandon (P&A) the six (6) on-site monitor wells. Pending NMOCD approval, the monitor wells will be P&A’d pursuant to NMOSE and NMOCD regulatory requirements.

## **5.0 QA/QC PROCEDURES**

### **5.1 Soil Sampling**

Soil Samples were submitted to Cardinal Laboratories in Hobbs, New Mexico, for analysis of BTEX, TPH, chloride, and/or metal concentrations using the methods described below. Soil samples were analyzed for BTEX, TPH, chloride, and/or metal concentrations within fourteen (14) days following the collection date.

The soil samples were analyzed as follows:

- BTEX concentrations in accordance with EPA Method SW 846-8021b
- TPH concentrations in accordance with modified EPA Method SW 846-8015M
- Chloride concentrations in accordance with EPA Method 4500 Cl-B
- Potassium, arsenic, and magnesium concentrations in accordance with EPA Method SW846 6010B

### **5.2 Groundwater Sampling**

Groundwater samples were submitted to Cardinal Laboratories of Hobbs, New Mexico, or Xenco Laboratories in Odessa, Texas, for analysis of chloride, BTEX, TCLP metals, and/or TDS concentrations using the methods described below. All samples were analyzed within approved holding times following the collection date.

The groundwater samples were analyzed as follows:

- Chloride concentrations in accordance with EPA Method SM 4500-CL-B
- BTEX concentrations in accordance with EPA Method SW846-8021b
- TCLP metal concentrations in accordance with EPA Methods SW846 6010B (TCLP metals) and SW7470A (TCLP mercury)
- TDS concentrations in accordance with EPA Method SM2540C
- Potassium, arsenic, and magnesium concentrations in accordance with EPA Method 600/4-91/010

### **5.3 Decontamination of Equipment**

Cleaning of the sampling equipment was the responsibility of the environmental technician. Prior to use, and between each sample, the sampling equipment was cleaned with Liqui-Nox® detergent and rinsed with distilled water.

## **5.4 Laboratory Protocol**

The laboratory was responsible for proper QA/QC procedures after signing the chain-of-custody form(s). These procedures were either transmitted with the laboratory reports or are on file at the laboratory.

## **6.0 SITE CLOSURE REQUEST**

Soil remediation activities at the G.H. Cobb Federal #1 site met the objectives set forth by the NMOCD, as detailed in the *Remediation Summary & Soil Closure Request* dated September 2011. Due to the environmental and safety concerns associated with the aforementioned "Island Project", Basin recommends BOPCO provide the NMOCD Santa Fe and Artesia District Offices a copy of this *Remediation Summary & Site Closure Request* and request the NMOCD grant site closure status to the G.H. Cobb Federal #1 site.

## **7.0 LIMITATIONS**

Basin Environmental Service Technologies, LLC, has prepared this *Remediation Summary & Site Closure Request* to the best of its ability. No other warranty, expressed or implied, is made or intended.

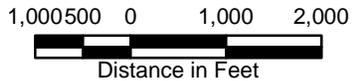
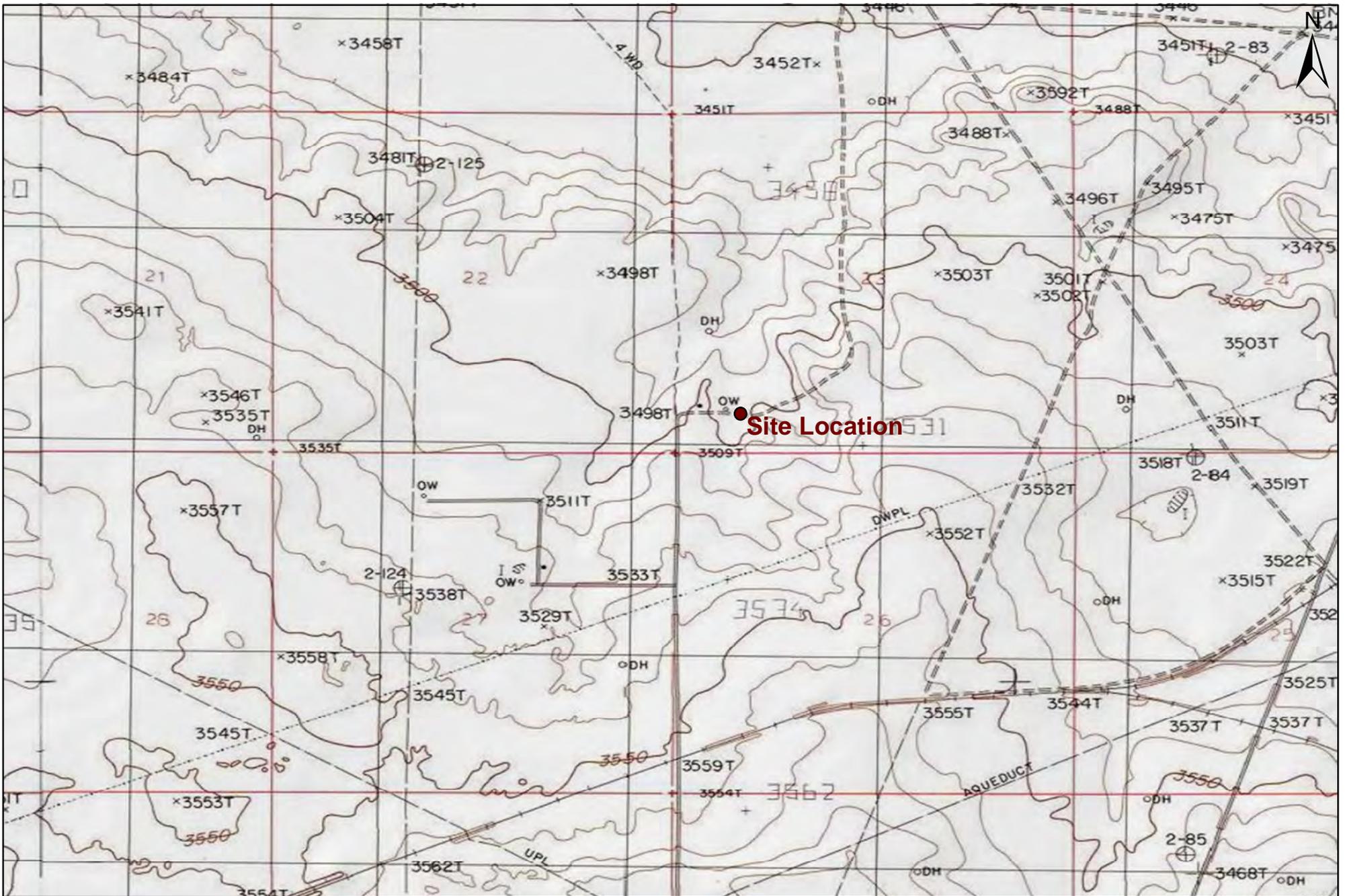
Basin Environmental Service Technologies, LLC, has examined and relied upon documents referenced in the report and has relied on oral statements made by certain individuals. Basin Environmental Service Technologies, LLC, has not conducted an independent examination of the facts contained in referenced materials and statements. We have presumed the genuineness of the documents and that the information provided in documents or statements is true and accurate. Basin Environmental Service Technologies, LLC, has prepared this report, in a professional manner, using the degree of skill and care exercised by similar environmental consultants. Basin Environmental Service Technologies, LLC, also notes that the facts and conditions referenced in this report may change over time and the conclusions and recommendations set forth herein are applicable only to the facts and conditions as described at the time of this report.

This report has been prepared for the benefit of BOPCO, LP. The information contained in this report, including all exhibits and attachments, may not be used by any other party without the express written consent of Basin Environmental Service Technologies, LLC, and/or BOPCO, LP.

## **8.0 DISTRIBUTION:**

- Copy 1: Glenn von Gonten  
New Mexico Energy, Minerals and Natural Resources Department  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505
- Copy 2: Mike Bratcher  
New Mexico Oil Conservation Division  
District 2  
1301 W. Grand Avenue  
Artesia, New Mexico 88210
- Copy 3: James Amos  
United States Department of the Interior  
Bureau of Land Management  
620 East Greene Street  
P.O. Box 1778  
Carlsbad, New Mexico 87220
- Copy 4: Tony Savoie  
BOPCO  
522 W. Mermod, Suite 704  
Carlsbad, New Mexico 88220
- Copy 5: Basin Environmental Service Technologies, LLC  
P.O. Box 301  
Lovington, New Mexico 88260

# Figures

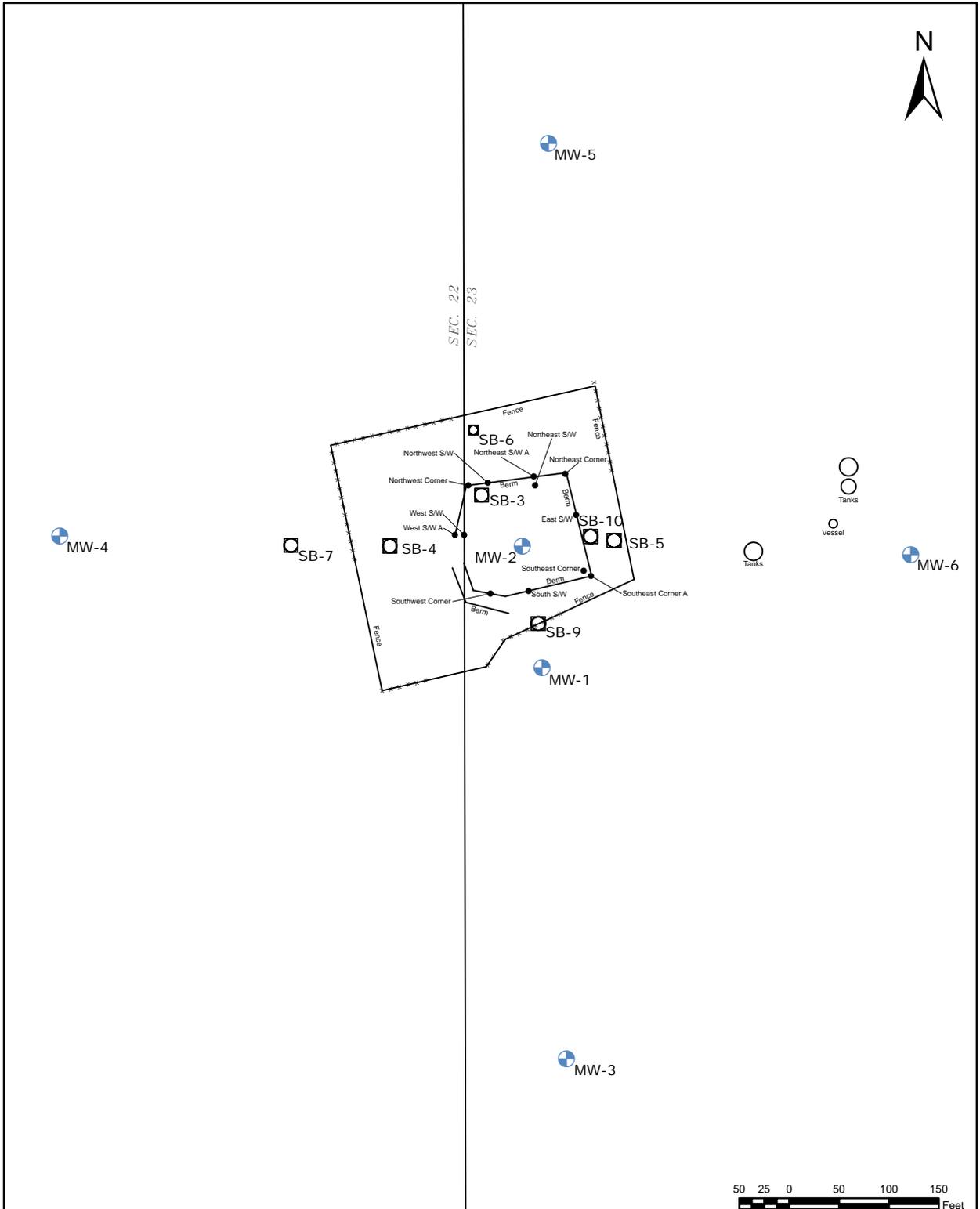


**Figure 1**  
**Site Location Map**  
**BOPCO, LP**  
**G.H. Cobb Federal #1**  
**Eddy County, New Mexico**  
**NMOCD Reference #: 2RP-369**



Basin Environmental Service Technologies, LLC  
 3100 Plains Hwy.  
 Lovington, NM 88260

Drawn By: BJA	Checked By: BRB
June 14, 2013	Scale: 1" = 2000'



**Legend:**

***** Fence	☉ Monitor Well
— Excavation Extent	☐ Soil Boring
(3,720) Groundwater Elevation (ft)	● Sample Location
→ Groundwater Gradient & Magnitude	

**Figure 2**  
**Site & Sample Location Map**  
**BOPCO, LP**  
**G.H. Cobb Federal #1**  
**Eddy County, New Mexico**  
**NMOCD Reference #: 2RP-369**

	Basin Environmental Service Technologies 3100 Plains Hwy. Lovington, NM 88260	
	Drawn By: BJA June 21, 2013	Checked By: BRB Scale: 1" = 150'

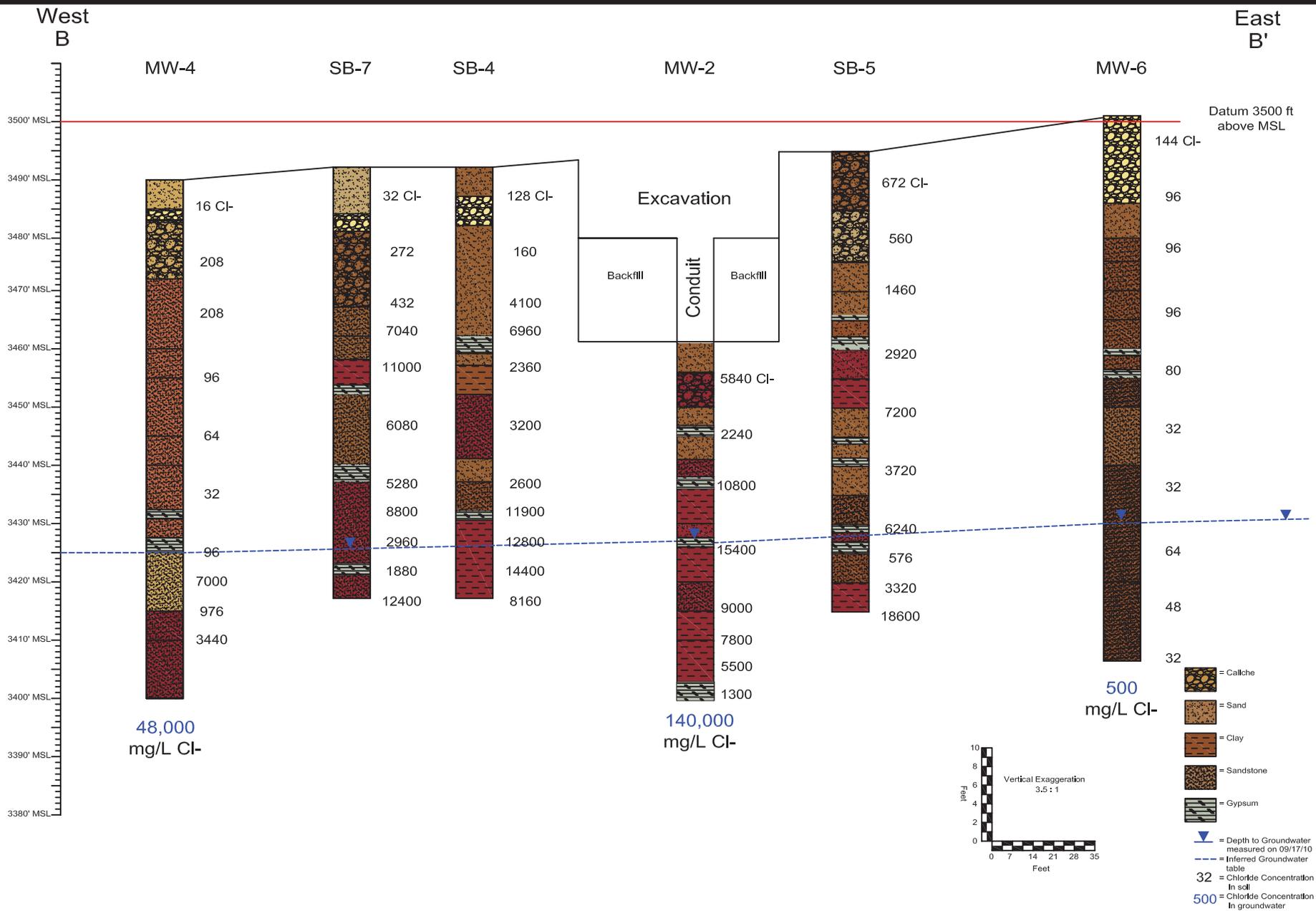
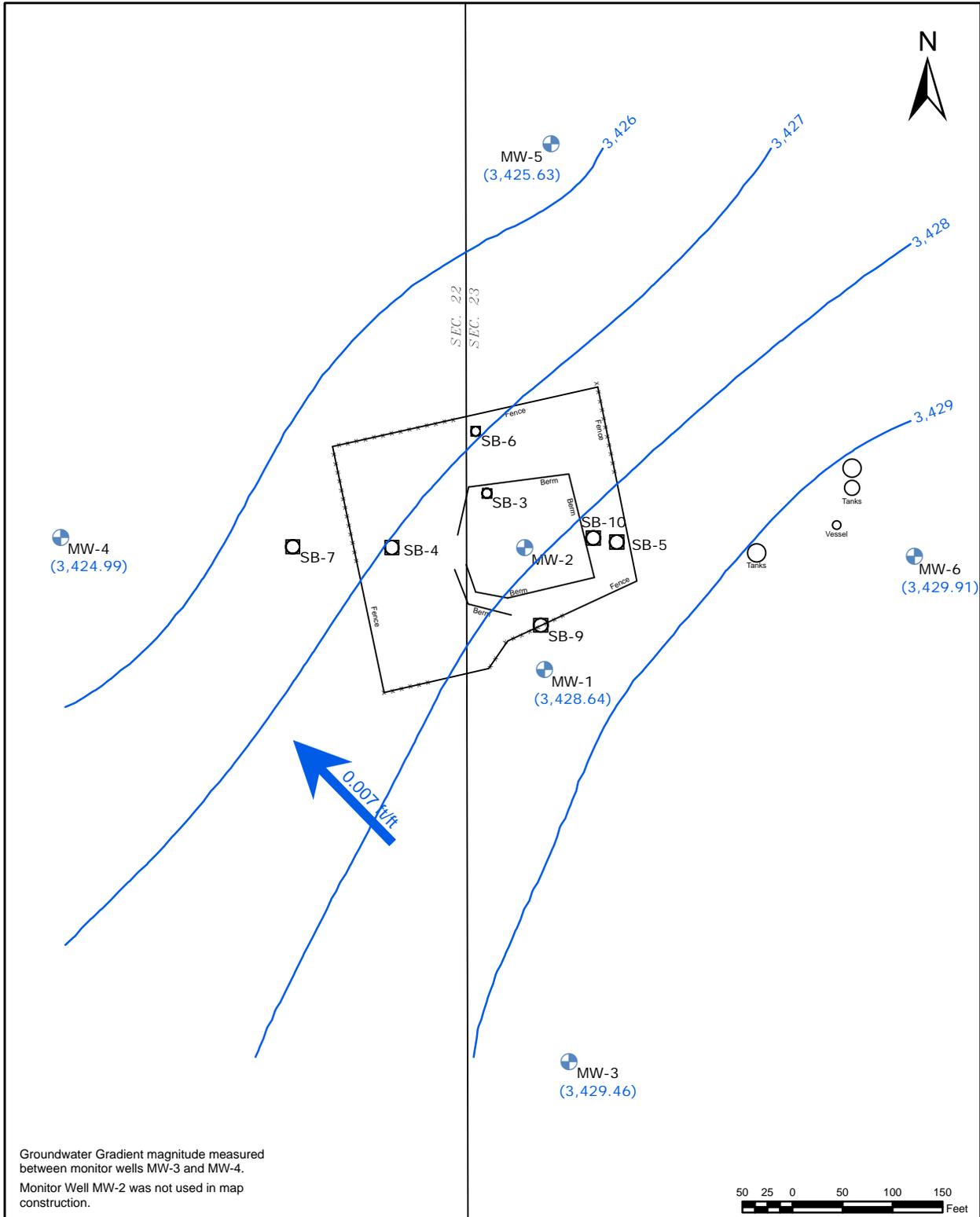


Figure 3  
 East - West Stratigraphic Cross-Section B - B'  
 BOPCO, LP  
 G. H. Cobb Federal #1 (2RP-369) Eddy County, New Mexico

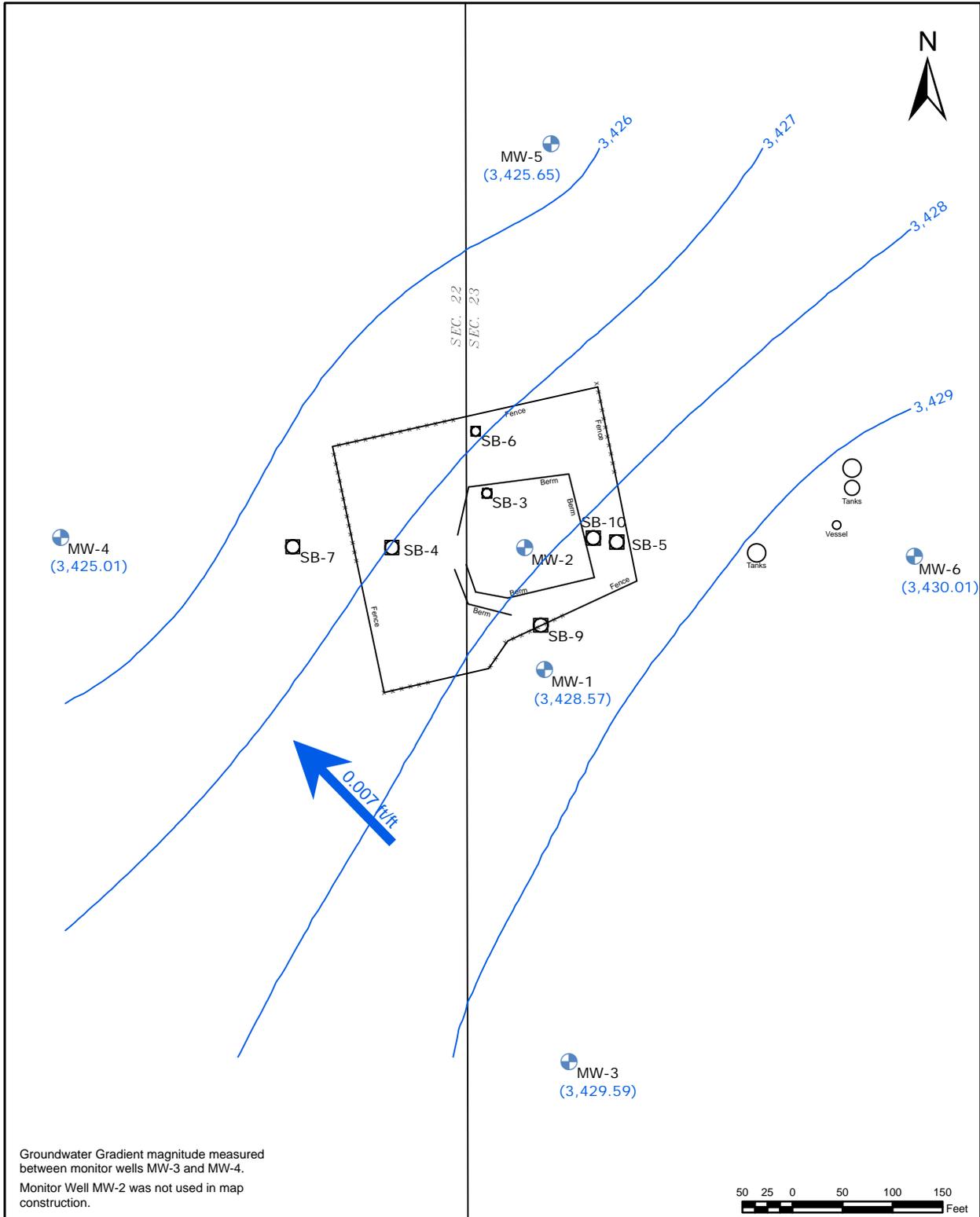


**Legend:**

***** Fence	Monitor Well
— Excavation Extent	Soil Boring
<u>(3,720)</u> Groundwater Elevation (ft)	
Groundwater Gradient & Magnitude	

**Figure 4A**  
**Inferred Groundwater Gradient Map**  
**1Q2013**  
**BOPCO, LP**  
**G.H. Cobb Federal #1**  
**Eddy County, New Mexico**  
**NMOCD Reference #: 2RP-369**

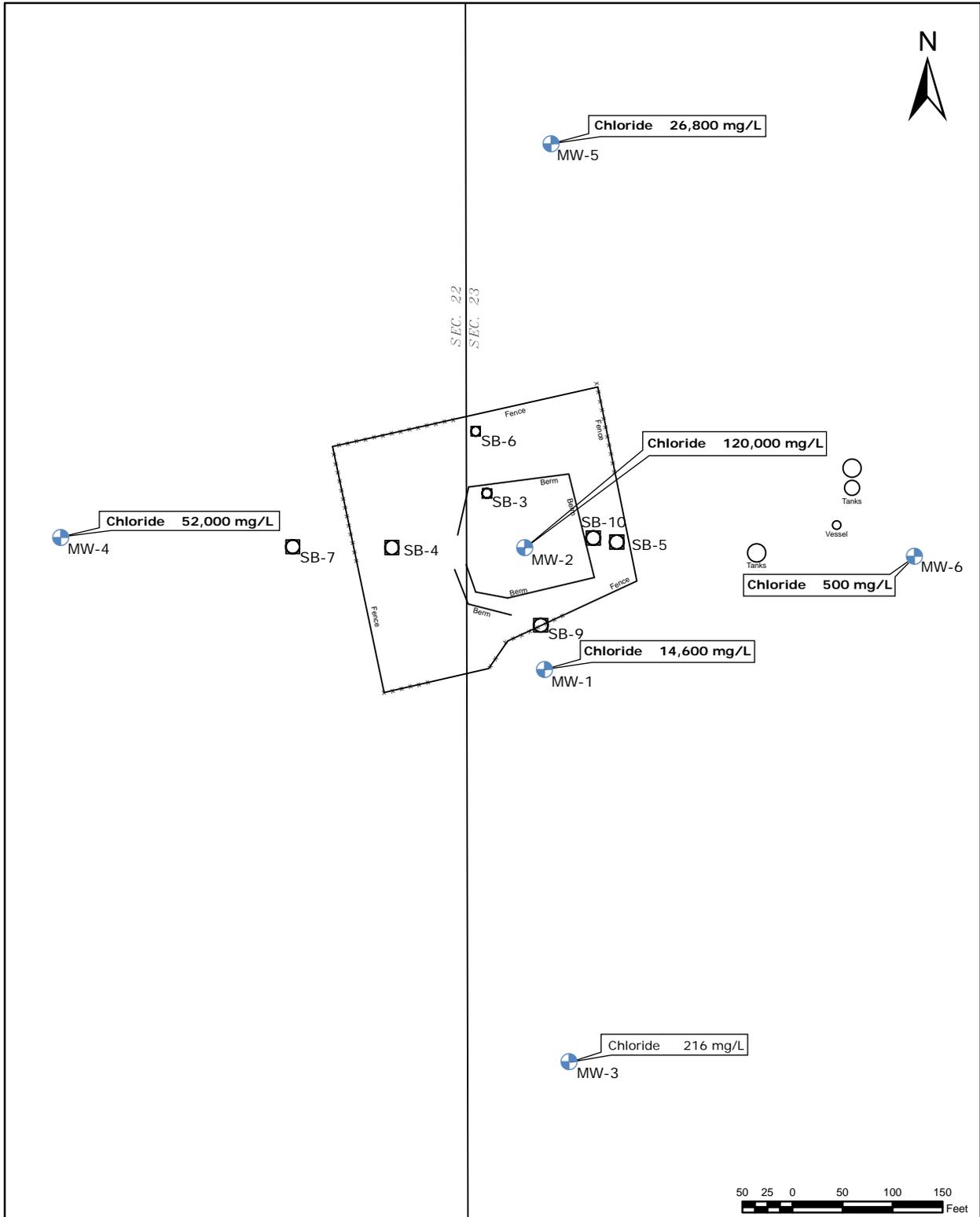
	Basin Environmental Service Technologies 3100 Plains Hwy. Lovington, NM 88260	
	Drawn By: BJA June 20, 2013	Checked By: BRB Scale: 1" = 150'



<b>Legend:</b>	
***** Fence	Monitor Well
— Excavation Extent	Soil Boring
(3,720) Groundwater Elevation (ft)	
0.007 ft/ft Groundwater Gradient & Magnitude	

**Figure 4B**  
**Inferred Groundwater Gradient Map**  
**2Q2013**  
**BOPCO, LP**  
**G.H. Cobb Federal #1**  
**Eddy County, New Mexico**  
**NMOCD Reference #: 2RP-369**

	Basin Environmental Service Technologies 3100 Plains Hwy. Lovington, NM 88260	
	Drawn By: BJA June 20, 2013	Checked By: BRB Scale: 1" = 150'

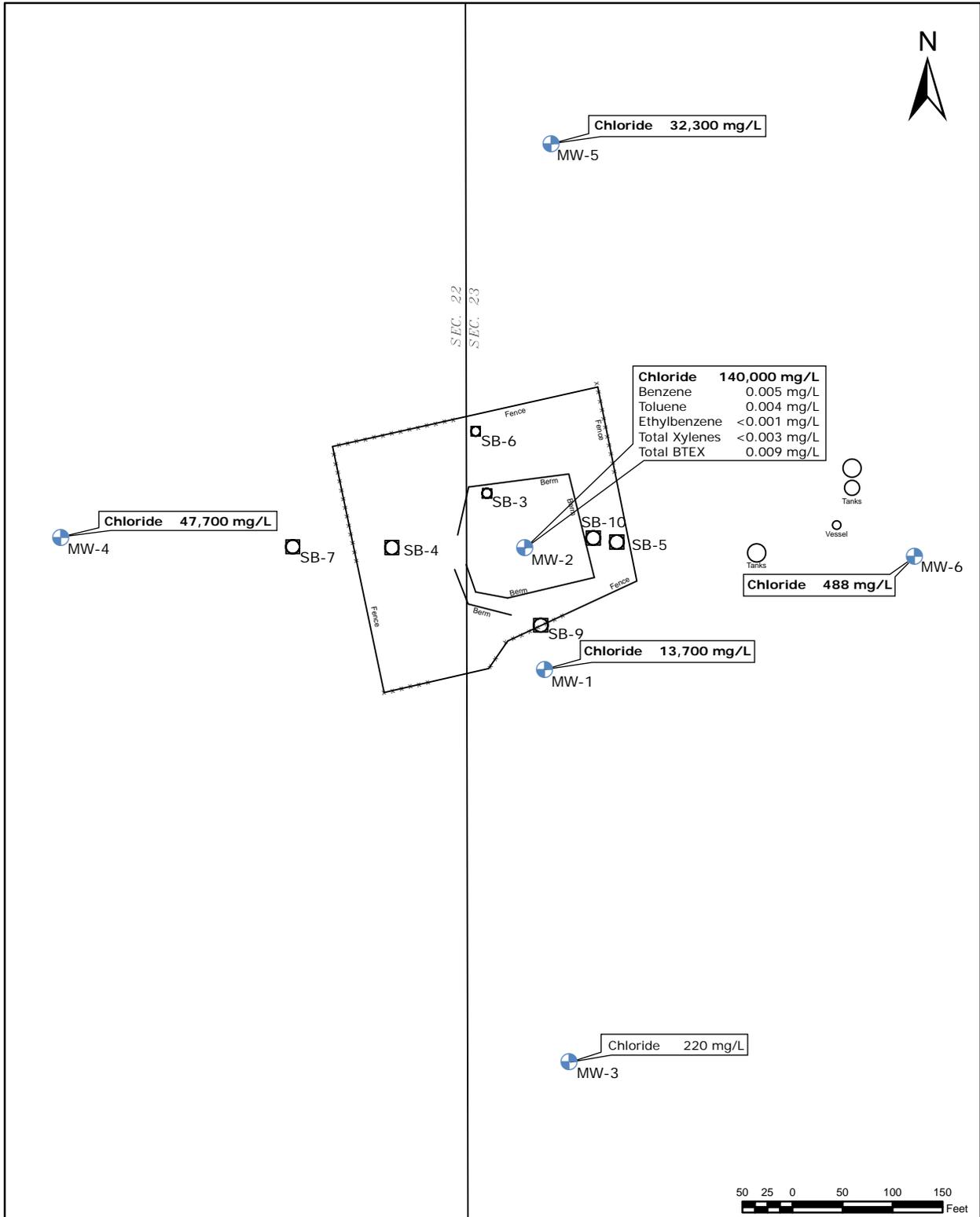


**Legend:**

***** Fence	Monitor Well
— Excavation Extent	Soil Boring
<u>(3,720)</u> Groundwater Elevation (ft)	
Groundwater Gradient & Magnitude	

**Figure 5A**  
**Groundwater Concentration Map**  
**1Q2013**  
**BOPCO, LP**  
**G.H. Cobb Federal #1**  
**Eddy County, New Mexico**  
**NMOCD Reference #: 2RP-369**

	Basin Environmental Service Technologies 3100 Plains Hwy. Lovington, NM 88260	
	Drawn By: BJA June 19, 2013	Checked By: BRB Scale: 1" = 150'



**Legend:**

\*\*\*\*\* Fence

— Excavation Extent

(3,720) Groundwater Elevation (ft)

0.009/100 Groundwater Gradient & Magnitude

Monitor Well

Soil Boring

**Figure 5B**  
**Groundwater Concentration Map**  
 2Q2013  
**BOPCO, LP**  
**G.H. Cobb Federal #1**  
**Eddy County, New Mexico**  
**NMOCD Reference #: 2RP-369**

Basin Environmental Service Technologies  
 Effective Solutions

Basin Environmental Service Technologies  
 3100 Plains Hwy.  
 Lovington, NM 88260

Drawn By: BJA	Checked By: BRB
June 19, 2013	Scale: 1" = 150'

# Tables

TABLE 1

## CONCENTRATIONS OF BTEX, TPH &amp; CHLORIDE IN SOIL

BOPCO, LP  
 G.H. COBB FEDERAL #1  
 EDDY COUNTY, NEW MEXICO  
 NMOCD REFERENCE #: 2RP-369

SAMPLE LOCATION	SAMPLE DEPTH (Below Grade Surface)	SAMPLE DATE	SOIL STATUS	METHOD: EPA SW 846-8021B, 5030					SW 848-8015M				4500 Cl-B
				BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL- BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)	BTEX (mg/Kg)	GRO C <sub>6</sub> -C <sub>10</sub> (mg/Kg)	DRO C <sub>10</sub> -C <sub>28</sub> (mg/Kg)	DRO Ext. C <sub>28</sub> -C <sub>35</sub> (mg/Kg)	TOTAL TPH C <sub>6</sub> -C <sub>35</sub> (mg/Kg)	CHLORIDE (mg/Kg)
SB-1 @ 5'	5'	12/30/09	In-Situ	-	-	-	-	-	<10.0	<10.0	<10.0	<10.0	320
SB-1 @ 15'	15'	12/30/09	In-Situ	-	-	-	-	-	<10.0	<10.0	<10.0	<10.0	128
SB-1 @ 25'	25'	12/30/09	In-Situ	-	-	-	-	-	<10.0	40.3	<10.0	40.3	304
SB-1 @ 35'	35'	12/30/09	In-Situ	-	-	-	-	-	<10.0	<10.0	<10.0	<10.0	1,090
SB-1 @ 45'	45'	12/30/09	In-Situ	-	-	-	-	-	<10.0	<10.0	<10.0	<10.0	80.0
SB-1 @ 55'	55'	12/30/09	In-Situ	-	-	-	-	-	<10.0	<10.0	<10.0	<10.0	64.0
SB-1 @ 60'	60'	12/30/09	In-Situ	-	-	-	-	-	<10.0	<10.0	<10.0	<10.0	112
SB-1 @ 65'	65'	12/30/09	In-Situ	-	-	-	-	-	<10.0	<10.0	<10.0	<10.0	8,200
SB-1 @ 70'	70'	12/30/09	In-Situ	-	-	-	-	-	<10.0	<10.0	<10.0	<10.0	4,480
SB-1 @ 75'	75'	12/30/09	In-Situ	-	-	-	-	-	<10.0	<10.0	<10.0	<10.0	1,230
SB-1 @ 80'	80'	12/30/09	In-Situ	-	-	-	-	-	<10.0	<10.0	<10.0	<10.0	896
SB-1 @ 85'	85'	12/30/09	In-Situ	-	-	-	-	-	<10.0	<10.0	<10.0	<10.0	624
SB-1 @ 90'	90'	12/30/09	In-Situ	-	-	-	-	-	<10.0	<10.0	<10.0	<10.0	144
SB-2 @ 5'	34'	01/04/10	In-Situ	<0.050	<0.050	<0.050	<0.300	<0.300	<10.0	15.6	<10.0	15.6	5,840
SB-2 @ 15'	44'	01/04/10	In-Situ	-	-	-	-	-	-	-	-	-	2,240
SB-2 @ 25'	54'	01/04/10	In-Situ	-	-	-	-	-	-	-	-	-	10,800
SB-2 @ 35'	64'	01/04/10	In-Situ	-	-	-	-	-	-	-	-	-	15,400
SB-2 @ 45'	74'	01/04/10	In-Situ	-	-	-	-	-	-	-	-	-	9,000
SB-2 @ 50'	79'	01/04/10	In-Situ	-	-	-	-	-	-	-	-	-	7,800
SB-2 @ 55'	84'	01/04/10	In-Situ	-	-	-	-	-	-	-	-	-	5,500
SB-2 @ 60'	89'	01/04/10	In-Situ	-	-	-	-	-	-	-	-	-	1,300
SB-3 @ 5'	20'	01/04/10	In-Situ	<0.050	<0.050	<0.050	<0.300	<0.300	<10.0	14.8	<10.0	14.8	528
SB-3 @ 15'	30'	01/04/10	In-Situ	-	-	-	-	-	-	-	-	-	384
SB-3 @ 25'	40'	01/04/10	In-Situ	-	-	-	-	-	-	-	-	-	4,800
SB-3 @ 35'	50'	01/04/10	In-Situ	-	-	-	-	-	-	-	-	-	6,800
SB-3 @ 40'	55'	01/04/10	In-Situ	-	-	-	-	-	-	-	-	-	12,000
SB-3 @ 45'	60'	01/04/10	In-Situ	-	-	-	-	-	-	-	-	-	9,500
SB-3 @ 55'	70'	01/04/10	In-Situ	-	-	-	-	-	-	-	-	-	6,300
SB-3 @ 60'	75'	01/04/10	In-Situ	-	-	-	-	-	-	-	-	-	5,200

TABLE 1

## CONCENTRATIONS OF BTEX, TPH &amp; CHLORIDE IN SOIL

BOPCO, LP  
 G.H. COBB FEDERAL #1  
 EDDY COUNTY, NEW MEXICO  
 NMOCD REFERENCE #: 2RP-369

SAMPLE LOCATION	SAMPLE DEPTH (Below Grade Surface)	SAMPLE DATE	SOIL STATUS	METHOD: EPA SW 846-8021B, 5030					SW 848-8015M				4500 Cl-B
				BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL- BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)	BTEX (mg/Kg)	GRO C <sub>6</sub> -C <sub>10</sub> (mg/Kg)	DRO C <sub>10</sub> -C <sub>28</sub> (mg/Kg)	DRO Ext. C <sub>28</sub> -C <sub>35</sub> (mg/Kg)	TOTAL TPH C <sub>6</sub> -C <sub>35</sub> (mg/Kg)	CHLORIDE (mg/Kg)
SB-4 @ 5'	5'	01/05/10	In-Situ	<0.050	<0.050	<0.050	<0.300	<0.300	<10.0	16.6	<10.0	16.6	128
SB-4 @ 15'	15'	01/05/10	In-Situ	-	-	-	-	-	-	-	-	-	160
SB-4 @ 25'	25'	01/05/10	In-Situ	-	-	-	-	-	-	-	-	-	4,100
SB-4 @ 30'	30'	01/05/10	In-Situ	-	-	-	-	-	-	-	-	-	6,960
SB-4 @ 35'	35'	01/05/10	In-Situ	-	-	-	-	-	-	-	-	-	2,360
SB-4 @ 45'	45'	01/05/10	In-Situ	-	-	-	-	-	-	-	-	-	3,200
SB-4 @ 55'	55'	01/05/10	In-Situ	-	-	-	-	-	-	-	-	-	2,600
SB-4 @ 60'	60'	01/05/10	In-Situ	-	-	-	-	-	-	-	-	-	11,900
SB-4 @ 65'	65'	01/05/10	In-Situ	-	-	-	-	-	-	-	-	-	12,800
SB-4 @ 70'	70'	01/05/10	In-Situ	-	-	-	-	-	-	-	-	-	14,400
SB-4 @ 75'	75'	01/05/10	In-Situ	-	-	-	-	-	-	-	-	-	8,160
SB-5 @ 5'	5'	01/05/10	In-Situ	<0.050	<0.050	<0.050	<0.300	<0.300	<10.0	17.2	<10.0	17.2	672
SB-5 @ 15'	15'	01/05/10	In-Situ	-	-	-	-	-	-	-	-	-	560
SB-5 @ 25'	25'	01/05/10	In-Situ	-	-	-	-	-	-	-	-	-	1,460
SB-5 @ 35'	35'	01/06/10	In-Situ	-	-	-	-	-	-	-	-	-	2,920
SB-5 @ 45'	45'	01/06/10	In-Situ	-	-	-	-	-	-	-	-	-	7,200
SB-5 @ 55'	55'	01/06/10	In-Situ	-	-	-	-	-	-	-	-	-	3,720
SB-5 @ 65'	65'	01/06/10	In-Situ	-	-	-	-	-	-	-	-	-	6,240
SB-5 @ 70'	70'	01/06/10	In-Situ	-	-	-	-	-	-	-	-	-	576
SB-5 @ 75'	75'	01/06/10	In-Situ	-	-	-	-	-	-	-	-	-	3,320
SB-5 @ 80'	80'	01/06/10	In-Situ	-	-	-	-	-	-	-	-	-	18,600
SB-6 @ 5'	5'	01/06/10	In-Situ	<0.050	<0.050	<0.050	<0.300	<0.300	<10.0	<10.0	<10.0	<10.0	432
SB-6 @ 15'	15'	01/06/10	In-Situ	-	-	-	-	-	-	-	-	-	304
SB-6 @ 25'	25'	01/06/10	In-Situ	-	-	-	-	-	-	-	-	-	704
SB-6 @ 35'	35'	01/06/10	In-Situ	-	-	-	-	-	-	-	-	-	7,520
SB-6 @ 45'	45'	01/06/10	In-Situ	-	-	-	-	-	-	-	-	-	4,320
SB-6 @ 55'	55'	01/06/10	In-Situ	-	-	-	-	-	-	-	-	-	5,760
SB-6 @ 60'	60'	01/06/10	In-Situ	-	-	-	-	-	-	-	-	-	8,560
SB-6 @ 65'	65'	01/06/10	In-Situ	-	-	-	-	-	-	-	-	-	13,400
SB-6 @ 70'	70'	01/06/10	In-Situ	-	-	-	-	-	-	-	-	-	12,400

TABLE 1

## CONCENTRATIONS OF BTEX, TPH &amp; CHLORIDE IN SOIL

BOPCO, LP  
 G.H. COBB FEDERAL #1  
 EDDY COUNTY, NEW MEXICO  
 NMOCD REFERENCE #: 2RP-369

SAMPLE LOCATION	SAMPLE DEPTH (Below Grade Surface)	SAMPLE DATE	SOIL STATUS	METHOD: EPA SW 846-8021B, 5030					SW 848-8015M				4500 Cl-B
				BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL- BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)	BTEX (mg/Kg)	GRO C <sub>6</sub> -C <sub>10</sub> (mg/Kg)	DRO C <sub>10</sub> -C <sub>28</sub> (mg/Kg)	DRO Ext. C <sub>28</sub> -C <sub>35</sub> (mg/Kg)	TOTAL TPH C <sub>6</sub> -C <sub>35</sub> (mg/Kg)	CHLORIDE (mg/Kg)
SB-7 @ 5'	5'	01/11/10	In-Situ	<0.050	<0.050	<0.050	<0.300	<0.300	<10.0	<10.0	<10.0	<10.0	32.0
SB-7 @ 15'	15'	01/11/10	In-Situ	-	-	-	-	-	-	-	-	-	272
SB-7 @ 25'	25'	01/11/10	In-Situ	-	-	-	-	-	-	-	-	-	432
SB-7 @ 30'	30'	01/11/10	In-Situ	-	-	-	-	-	-	-	-	-	7,040
SB-7 @ 35'	35'	01/11/10	In-Situ	-	-	-	-	-	-	-	-	-	11,000
SB-7 @ 45'	45'	01/11/10	In-Situ	-	-	-	-	-	-	-	-	-	6,080
SB-7 @ 55'	55'	01/11/10	In-Situ	-	-	-	-	-	-	-	-	-	5,280
SB-7 @ 60'	60'	01/11/10	In-Situ	-	-	-	-	-	-	-	-	-	8,800
SB-7 @ 65'	65'	01/11/10	In-Situ	-	-	-	-	-	-	-	-	-	2,960
SB-7 @ 70'	70'	01/11/10	In-Situ	-	-	-	-	-	-	-	-	-	1,880
SB-7 @ 75'	75'	01/11/10	In-Situ	-	-	-	-	-	-	-	-	-	12,400
SB-8 @ 5'	5'	01/12/10	In-Situ	<0.050	<0.050	<0.050	<0.300	<0.300	<10.0	<10.0	<10.0	<10.0	560
SB-8 @ 15'	15'	01/12/10	In-Situ	-	-	-	-	-	-	-	-	-	240
SB-8 @ 25'	25'	01/12/10	In-Situ	-	-	-	-	-	-	-	-	-	288
SB-8 @ 35'	35'	01/12/10	In-Situ	-	-	-	-	-	-	-	-	-	80.0
SB-8 @ 45'	45'	01/12/10	In-Situ	-	-	-	-	-	-	-	-	-	48.0
SB-8 @ 55'	55'	01/12/10	In-Situ	-	-	-	-	-	-	-	-	-	32.0
SB-8 @ 65'	65'	01/12/10	In-Situ	-	-	-	-	-	-	-	-	-	32.0
SB-8 @ 75'	75'	01/12/10	In-Situ	-	-	-	-	-	-	-	-	-	32.0
SB-8 @ 80'	80'	01/12/10	In-Situ	-	-	-	-	-	-	-	-	-	48.0
SB-8 @ 85'	85'	01/12/10	In-Situ	-	-	-	-	-	-	-	-	-	48.0
SB-9 @ 5'	5'	01/12/10	In-Situ	<0.050	<0.050	<0.050	<0.300	<0.300	<10.0	<10.0	<10.0	<10.0	1,140
SB-9 @ 15'	15'	01/12/10	In-Situ	-	-	-	-	-	-	-	-	-	144
SB-9 @ 20'	20'	01/12/10	In-Situ	-	-	-	-	-	-	-	-	-	192
SB-10 @ 5'	5'	01/12/10	In-Situ	<0.050	<0.050	<0.050	<0.300	<0.300	<10.0	42.7	<10.0	42.7	1,360
SB-10 @ 15'	15'	01/12/10	In-Situ	-	-	-	-	-	-	-	-	-	416
SB-10 @ 20'	20'	01/12/10	In-Situ	-	-	-	-	-	-	-	-	-	224

TABLE 1

## CONCENTRATIONS OF BTEX, TPH &amp; CHLORIDE IN SOIL

BOPCO, LP  
 G.H. COBB FEDERAL #1  
 EDDY COUNTY, NEW MEXICO  
 NMOCD REFERENCE #: 2RP-369

SAMPLE LOCATION	SAMPLE DEPTH (Below Grade Surface)	SAMPLE DATE	SOIL STATUS	METHOD: EPA SW 846-8021B, 5030					SW 848-8015M				4500 Cl-B
				BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL- BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)	BTEX (mg/Kg)	GRO C <sub>6</sub> -C <sub>10</sub> (mg/Kg)	DRO C <sub>10</sub> -C <sub>28</sub> (mg/Kg)	DRO Ext. C <sub>28</sub> -C <sub>35</sub> (mg/Kg)	TOTAL TPH C <sub>6</sub> -C <sub>35</sub> (mg/Kg)	CHLORIDE (mg/Kg)
SB-11 @ 5'	5'	01/13/10	In-Situ	<0.050	<0.050	<0.050	<0.300	<0.300	<10.0	<10.0	<10.0	<10.0	16.0
SB-11 @ 15'	15'	01/13/10	In-Situ	-	-	-	-	-	-	-	-	-	208
SB-11 @ 25'	25'	01/13/10	In-Situ	-	-	-	-	-	-	-	-	-	208
SB-11 @ 35'	35'	01/13/10	In-Situ	-	-	-	-	-	-	-	-	-	96.0
SB-11 @ 45'	45'	01/13/10	In-Situ	-	-	-	-	-	-	-	-	-	64.0
SB-11 @ 55'	55'	01/13/10	In-Situ	-	-	-	-	-	-	-	-	-	32.0
SB-11 @ 65'	65'	01/13/10	In-Situ	-	-	-	-	-	-	-	-	-	96.0
SB-11 @ 70'	70'	01/13/10	In-Situ	-	-	-	-	-	-	-	-	-	7,000
SB-11 @ 75'	75'	01/13/10	In-Situ	-	-	-	-	-	-	-	-	-	976
SB-11 @ 80'	80'	01/15/10	In-Situ	-	-	-	-	-	-	-	-	-	3,440
SB-12 @ 5'	5'	01/15/10	In-Situ	<0.050	<0.050	<0.050	<0.300	<0.300	<10.0	<10.0	<10.0	<10.0	48.0
SB-12 @ 15'	15'	01/15/10	In-Situ	-	-	-	-	-	-	-	-	-	208
SB-12 @ 25'	25'	01/15/10	In-Situ	-	-	-	-	-	-	-	-	-	240
SB-12 @ 35'	35'	01/15/10	In-Situ	-	-	-	-	-	-	-	-	-	48.0
SB-12 @ 45'	45'	01/15/10	In-Situ	-	-	-	-	-	-	-	-	-	128
SB-12 @ 55'	55'	01/15/10	In-Situ	-	-	-	-	-	-	-	-	-	144
SB-12 @ 65'	65'	01/15/10	In-Situ	-	-	-	-	-	-	-	-	-	4,000
SB-12 @ 75'	75'	01/15/10	In-Situ	-	-	-	-	-	-	-	-	-	2,640
SB-12 @ 80'	80'	01/15/10	In-Situ	-	-	-	-	-	-	-	-	-	5,680
SB-12 @ 85'	85'	01/15/10	In-Situ	-	-	-	-	-	-	-	-	-	2,680
SB-12 @ 90'	90'	01/15/10	In-Situ	-	-	-	-	-	-	-	-	-	992
SB-13 @ 5'	5'	01/15/10	In-Situ	<0.050	<0.050	<0.050	<0.300	<0.300	<10.0	<10.0	<10.0	<10.0	144
SB-13 @ 15'	15'	01/15/10	In-Situ	-	-	-	-	-	-	-	-	-	96.0
SB-13 @ 25'	25'	01/15/10	In-Situ	-	-	-	-	-	-	-	-	-	96.0
SB-13 @ 35'	35'	01/15/10	In-Situ	-	-	-	-	-	-	-	-	-	96.0
SB-13 @ 45'	45'	01/15/10	In-Situ	-	-	-	-	-	-	-	-	-	80.0
SB-13 @ 55'	55'	01/15/10	In-Situ	-	-	-	-	-	-	-	-	-	32.0
SB-13 @ 65'	65'	01/15/10	In-Situ	-	-	-	-	-	-	-	-	-	32.0
SB-13 @ 75'	75'	01/15/10	In-Situ	-	-	-	-	-	-	-	-	-	64.0
SB-13 @ 85'	85'	01/15/10	In-Situ	-	-	-	-	-	-	-	-	-	48.0
SB-13 @ 95'	95'	01/15/10	In-Situ	-	-	-	-	-	-	-	-	-	32.0

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 NMOCD REFERENCE #: 2RP-369

SAMPLE LOCATION	SAMPLE DEPTH (Below Grade Surface)	SAMPLE DATE	SOIL STATUS	METHOD: EPA SW 846-8021B, 5030					SW 848-8015M				4500 Cl-B
				BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL- BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)	BTEX (mg/Kg)	GRO C <sub>6</sub> -C <sub>10</sub> (mg/Kg)	DRO C <sub>10</sub> -C <sub>28</sub> (mg/Kg)	DRO Ext. C <sub>28</sub> -C <sub>35</sub> (mg/Kg)	TOTAL TPH C <sub>6</sub> -C <sub>35</sub> (mg/Kg)	CHLORIDE (mg/Kg)
Northwest S/W @ 10'	10'	01/08/10	In-Situ	<0.050	0.065	<0.050	<0.300	0.065	<10.0	<10.0	<10.0	<10.0	256
Northeast S/W @ 10'	10'	01/08/10	Excavated	<0.050	<0.050	<0.050	<0.300	<0.300	<10.0	<10.0	<10.0	<10.0	1,220
West S/W @ 10'	10'	01/08/10	Excavated	<0.050	<0.050	<0.050	<0.300	<0.300	<10.0	<10.0	<10.0	<10.0	4,600
East S/W @ 10'	10'	01/08/10	In-Situ	<0.050	<0.050	<0.050	<0.300	<0.300	<10.0	<10.0	<10.0	<10.0	9,900
South S/W @ 10'	10'	01/08/10	In-Situ	<0.050	<0.050	<0.050	<0.300	<0.300	<10.0	<10.0	<10.0	<10.0	8,500
Northwest Corner @ 10'	10'	01/08/10	In-Situ	<0.050	<0.050	<0.050	<0.300	<0.300	<10.0	<10.0	<10.0	<10.0	192
Northeast Corner @ 10'	10'	01/08/10	In-Situ	<0.050	<0.050	<0.050	<0.300	<0.300	<10.0	<10.0	<10.0	<10.0	3,680
Southwest Corner @ 10'	10'	01/08/10	In-Situ	<0.050	<0.050	<0.050	<0.300	<0.300	<10.0	<10.0	<10.0	<10.0	896
Southeast Corner @ 10'	10'	01/08/10	Excavated	<0.050	<0.050	<0.050	<0.300	<0.300	<10.0	<10.0	<10.0	<10.0	6,900
Northeast S/W A @ 10'	10'	02/11/10	In-Situ	-	-	-	-	-	-	-	-	-	1,060
Southeast Corner A @ 10'	10'	02/11/10	In-Situ	-	-	-	-	-	-	-	-	-	768
West S/W A @ 10'	10'	02/11/10	In-Situ	-	-	-	-	-	-	-	-	-	672
<b>NMOCD Regulatory Standard</b>				<b>10</b>				<b>50</b>				<b>100</b>	<b>1,000</b>

- = Not analyzed

**TABLE 2**

**CONCENTRATIONS OF POTASSIUM, ARSENIC & MAGNESIUM IN SOIL**

**BOPCO, LP  
G.H. COBB FEDERAL #1  
EDDY COUNTY, NEW MEXICO  
NMOCD REFERENCE #: 2RP-369**

SAMPLE LOCATION	SAMPLE DEPTH (Below Grade Surface)	SAMPLE DATE	SOIL STATUS	METHOD: EPA 600/4-91/010, 3050		
				TOTAL POTASSIUM (mg/Kg)	TOTAL ARSENIC (mg/Kg)	TOTAL MAGNESIUM (mg/Kg)
SB-1 @ 60'	60'	12/30/09	In-Situ	459	<5.00	3,340
SB-1 @ 65'	65'	12/30/09	In-Situ	494	<5.00	4,600
SB-1 @ 70'	70'	12/30/09	In-Situ	600	<5.00	7,140
SB-1 @ 75'	75'	12/30/09	In-Situ	2,150	7.20	12,200
SB-2 @ Surface	29'	01/04/10	In-Situ	701	10.8	3,170
SB-2 @ 5'	34'	01/04/10	In-Situ	730	<10.0	8,900
SB-2 @ 35'	64'	01/04/10	In-Situ	1,060	<10.0	7,110
SB-2 @ 40'	69'	01/04/10	In-Situ	1,330	16.0	18,800
SB-2 @ 45'	74'	01/04/10	In-Situ	684	<10.0	6,740
SB-2 @ 50'	79'	01/04/10	In-Situ	884	11.2	12,300
SB-3 @ Surface	15'	01/04/10	In-Situ	1,030	<10.0	7,290
SB-3 @ 5'	20'	01/04/10	In-Situ	455	<10.0	4,150
SB-3 @ 50'	65'	01/04/10	In-Situ	1,610	<10.0	9,930
SB-3 @ 55'	70'	01/04/10	In-Situ	1,490	12.1	14,800
SB-3 @ 60'	75'	01/04/10	In-Situ	1,990	13.9	16,600
SB-4 @ 25'	25'	01/05/10	In-Situ	452	11.9	3,660
SB-4 @ 60'	60'	01/05/10	In-Situ	927	<10.0	7,960
SB-4 @ 65'	65'	01/05/10	In-Situ	1,420	12.7	18,400
SB-4 @ 70'	70'	01/05/10	In-Situ	1,350	10.0	13,000
SB-4 @ 75'	75'	01/05/10	In-Situ	1,010	14.3	15,800
SB-5 @ 25'	25'	01/06/10	In-Situ	752	<10.0	6,670
SB-5 @ 65'	65'	01/06/10	In-Situ	1,150	<10.0	5,100
SB-5 @ 70'	70'	01/06/10	In-Situ	1,290	15.1	18,100
SB-5 @ 75'	75'	01/06/10	In-Situ	630	<10.0	3,260
SB-5 @ 80'	80'	01/06/10	In-Situ	1,200	<10.0	9,770
SB-6 @ 25'	25'	01/06/10	In-Situ	887	<10.0	6,260
SB-6 @ 35'	35'	01/06/10	In-Situ	985	<10.0	18,000
SB-6 @ 60'	60'	01/06/10	In-Situ	1,570	<10.0	6,990
SB-6 @ 65'	65'	01/06/10	In-Situ	1,220	10.4	11,000
SB-6 @ 70'	70'	01/06/10	In-Situ	748	<10.0	2,870

**TABLE 4**

**CONCENTRATIONS OF CHLORIDE IN GROUNDWATER**

**BOPCO, LP  
G.H. COBB FEDERAL #1  
EDDY COUNTY, NEW MEXICO  
NMOCD REFERENCE #: 2RP-369**

SAMPLE LOCATION	SAMPLE DATE	4500 CI-B
		CHLORIDE (mg/L)
MW-1	01/26/10	41,000
	06/03/10	46,000
	09/17/10	43,000
	12/15/10	36,000
	03/23/11	37,000
	06/08/11	41,600
	08/31/11	32,400
	11/15/11	26,400
	02/10/12	28,000
	05/21/12	22,400
	08/21/12	22,800
	10/15/12	20,800
	02/07/13	14,600
	04/11/13	13,700
MW-2	01/26/10	134,000
	06/03/10	134,000
	09/17/10	140,000
	12/15/10	142,000
	03/23/11	136,000
	06/08/11	140,000
	08/31/11	136,000
	11/15/11	134,000
	02/10/12	124,000
	05/21/12	118,000
	08/21/12	109,000
	10/15/12	118,000
	02/07/13	120,000
	04/11/13	140,000
MW-3	01/26/10	124
	06/03/10	200
	09/17/10	220
	12/15/10	212
	03/23/11	224
	06/08/11	228
	08/31/11	224
	11/15/11	224
	02/10/12	224
	05/21/12	220
08/21/12	216	

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**BOPCO, LP  
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SAMPLE LOCATION	SAMPLE DATE	4500 CI-B
		CHLORIDE (mg/L)
MW-3	10/15/12	224
	02/07/13	216
	04/11/13	220
MW-4	01/26/10	<b>51,000</b>
	06/03/10	<b>49,500</b>
	09/17/10	<b>48,000</b>
	12/15/10	<b>46,000</b>
	03/23/11	<b>49,500</b>
	06/08/11	<b>48,000</b>
	08/31/11	<b>52,000</b>
	11/15/11	<b>54,000</b>
	02/10/12	<b>49,000</b>
	05/21/12	<b>45,000</b>
	08/21/12	<b>45,600</b>
	10/15/12	<b>46,000</b>
	02/07/13	<b>52,000</b>
	04/11/13	<b>47,700</b>
MW-5	01/26/10	<b>83,000</b>
	06/03/10	<b>70,000</b>
	09/17/10	<b>76,000</b>
	12/15/10	<b>69,000</b>
	03/23/11	<b>27,000</b>
	06/08/11	<b>98,000</b>
	08/31/11	<b>22,400</b>
	11/15/11	<b>90,000</b>
	02/10/12	<b>70,000</b>
	05/21/12	<b>54,000</b>
	08/21/12	<b>21,200</b>
	10/15/12	<b>26,500</b>
	02/07/13	<b>26,800</b>
	04/11/13	<b>32,300</b>
MW-6	01/26/10	424
	06/03/10	456
	09/17/10	500
	12/15/10	500
	03/23/11	500
	06/08/11	530
	08/31/11	540

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**CONCENTRATIONS OF CHLORIDE IN GROUNDWATER**

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SAMPLE LOCATION	SAMPLE DATE	4500 CI-B
		CHLORIDE (mg/L)
MW-6	11/15/11	520
	02/10/12	500
	05/21/12	488
	08/21/12	510
	10/15/12	490
	02/07/13	500
	04/11/13	488
Prod Water	01/26/10	170,000
<b>NMOCD Criteria</b>		<b>250</b>

- = Not Analyzed

**TABLE 5**  
**CONCENTRATIONS OF BTEX, METALS & TDS IN GROUNDWATER**

BOPCO, LP  
G.H. COBB FEDERAL #1  
EDDY COUNTY, NEW MEXICO  
NMOCD REFERENCE #: 2RP-369

SAMPLE LOCATION	SAMPLE DATE	EPA 8021B							EPA 600/4-91/010			TCLP SW846 6010B							SW 7470A	EPA160.1
		BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL-BENZENE (mg/L)	M,P-XYLENES (mg/L)	O-XYLENE S (mg/L)	TOTAL XYLENES (mg/L)	TOTAL BTEX (mg/L)	TOTAL POTASSIUM (mg/L)	TOTAL ARSENIC (mg/L)	TOTAL MAGNESIUM (mg/L)	LEAD (mg/L)	ARSENIC (mg/L)	CADMIUM (mg/L)	CHROMIUM (mg/L)	SELENIUM (mg/L)	SILVER (mg/L)	BARIUM (mg/L)	MERCURY (mg/L)	TDS (mg/L)
MW-1	01/26/10	-	-	-	-	-	-	-	1,500	2.5	3,630	-	-	-	-	-	-	-	-	63,200
MW-2	01/26/10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	215,000
	03/24/10	0.0208	<0.0400	<0.0200	0.0432	<0.200	0.0432	0.064	-	-	-	<2.22	<2.22	<0.111	<0.556	<2.22	<0.444	1.43	<0.0001	-
	04/11/13	0.005	0.004	<0.001	-	-	<0.003	0.009	-	-	-	-	-	-	-	-	-	-	-	-
MW-3	01/26/10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	773
MW-4	01/26/10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	72,500
MW-5	01/26/10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	118,000
MW-6	01/26/10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,440
Prod Water	01/26/10	-	-	-	-	-	-	-	1,500	2.50	3,630	-	-	-	-	-	-	-	-	-
Produced Water Tank	03/24/10	0.0798	<0.0400	0.1028	<0.0400	<0.0200	<0.0400	0.1826	-	-	-	<2.22	<2.22	<0.111	<0.556	<2.22	<0.444	2.06	<0.0001	-
<b>NMOCD Regulatory Standard</b>		<b>0.01</b>	<b>0.75</b>	<b>0.75</b>	<b>TOTAL XYLENES</b>	<b>0.62</b>				<b>0.1</b>		<b>1.00</b>	<b>1.00</b>	<b>0.2</b>	<b>1.00</b>	<b>1.00</b>	<b>1.00</b>	<b>20</b>	<b>0.04</b>	<b>1,000</b>

- = Not Analyzed

# **Appendices**

## **Appendix A**

**Pit, Closed-Loop System, Below-Grade  
Tank, or Proposed Alternative Method  
Permit or Closure Plan Application  
(Form C-144)**

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

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

For temporary pits, closed-loop systems, and below-grade tanks, submit to the appropriate NMOCD District Office.  
For permanent pits and exceptions submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Closed-Loop System, Below-Grade Tank, or  
Proposed Alternative Method Permit or Closure Plan Application

- Type of action:  Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method  
 Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method  
 Modification to an existing permit  
 Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system, below-grade tank, or proposed alternative method

**Instructions:** Please submit one application (Form C-144) per individual pit, closed-loop system, below-grade tank or alternative request

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.  
Operator: BOPCO, L.P. OGRID #: 001801  
Address: P.O. Box 2760, Midland, Texas 79702  
Facility or well name: G.H. Cobb Federal #1  
API Number: 30-015-05829 OCD Permit Number:  
U/L or Qtr/Qtr M Section 23 Township 20S Range 31E County: Eddy  
Center of Proposed Design: Latitude N32°33'11.412 Longitude W103°50'44.304 NAD:  1927  1983  
Surface Owner:  Federal  State  Private  Tribal Trust or Indian Allotment

2.  
 **Pit:** Subsection F or G of 19.15.17.11 NMAC  
Temporary:  Drilling  Workover  
 Permanent  Emergency  Cavitation  P&A  
 Lined  Unlined Liner type: Thickness \_\_\_\_\_ mil  LLDPE  HDPE  PVC  Other \_\_\_\_\_  
 String-Reinforced  
Liner Seams:  Welded  Factory  Other \_\_\_\_\_ Volume: \_\_\_\_\_ bbl Dimensions: L \_\_\_\_\_ x W \_\_\_\_\_ x D \_\_\_\_\_

3.  
 **Closed-loop System:** Subsection H of 19.15.17.11 NMAC  
Type of Operation:  P&A  Drilling a new well  Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)  
 Drying Pad  Above Ground Steel Tanks  Haul-off Bins  Other \_\_\_\_\_  
 Lined  Unlined Liner type: Thickness \_\_\_\_\_ mil  LLDPE  HDPE  PVC  Other \_\_\_\_\_  
Liner Seams:  Welded  Factory  Other \_\_\_\_\_

4.  
 **Below-grade tank:** Subsection I of 19.15.17.11 NMAC  
Volume: \_\_\_\_\_ bbl Type of fluid: \_\_\_\_\_  
Tank Construction material: \_\_\_\_\_  
 Secondary containment with leak detection  Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off  
 Visible sidewalls and liner  Visible sidewalls only  Other \_\_\_\_\_  
Liner type: Thickness \_\_\_\_\_ mil  HDPE  PVC  Other \_\_\_\_\_

5.  
 **Alternative Method:**  
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

6.

**Fencing:** Subsection D of 19.15.17.11 NMAC (*Applies to permanent pits, temporary pits, and below-grade tanks*)

- Chain link, six feet in height, two strands of barbed wire at top (*Required if located within 1000 feet of a permanent residence, school, hospital, institution or church*)
- Four foot height, four strands of barbed wire evenly spaced between one and four feet
- Alternate. Please specify \_\_\_\_\_

7.

**Netting:** Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)

- Screen  Netting  Other \_\_\_\_\_
- Monthly inspections (If netting or screening is not physically feasible)

8.

**Signs:** Subsection C of 19.15.17.11 NMAC

- 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers
- Signed in compliance with 19.15.3.103 NMAC

9.

**Administrative Approvals and Exceptions:**

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

*Please check a box if one or more of the following is requested, if not leave blank:*

- Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval.
- Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

10.

**Siting Criteria (regarding permitting):** 19.15.17.10 NMAC

*Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.*

- |  |   |
|--|---|
| <p>Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank.</p> <ul style="list-style-type: none"> <li>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells</li> </ul>   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| <p>Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).</p> <ul style="list-style-type: none"> <li>- Topographic map; Visual inspection (certification) of the proposed site</li> </ul>   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| <p>Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (<i>Applies to temporary, emergency, or cavitation pits and below-grade tanks</i>)</p> <ul style="list-style-type: none"> <li>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>  | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| <p>Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (<i>Applies to permanent pits</i>)</p> <ul style="list-style-type: none"> <li>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| <p>Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.</p> <ul style="list-style-type: none"> <li>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site</li> </ul> | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| <p>Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended.</p> <ul style="list-style-type: none"> <li>- Written confirmation or verification from the municipality; Written approval obtained from the municipality</li> </ul>  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| <p>Within 500 feet of a wetland.</p> <ul style="list-style-type: none"> <li>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</li> </ul>  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| <p>Within the area overlying a subsurface mine.</p> <ul style="list-style-type: none"> <li>- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division</li> </ul>  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| <p>Within an unstable area.</p> <ul style="list-style-type: none"> <li>- Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| <p>Within a 100-year floodplain.</p> <ul style="list-style-type: none"> <li>- FEMA map</li> </ul>  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |

11. **Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC  
*Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.*

- Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
- Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

12. **Closed-loop Systems Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC  
*Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.*

- Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9
- Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC
- Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
- Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_
- Previously Approved Operating and Maintenance Plan API Number: \_\_\_\_\_ (Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)

13. **Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC  
*Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.*

- Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- Climatological Factors Assessment
- Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- Quality Control/Quality Assurance Construction and Installation Plan
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Nuisance or Hazardous Odors, including H<sub>2</sub>S, Prevention Plan
- Emergency Response Plan
- Oil Field Waste Stream Characterization
- Monitoring and Inspection Plan
- Erosion Control Plan
- Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

14. **Proposed Closure:** 19.15.17.13 NMAC  
*Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.*

- Type:  Drilling  Workover  Emergency  Cavitation  P&A  Permanent Pit  Below-grade Tank  Closed-loop System  
 Alternative
- Proposed Closure Method:  Waste Excavation and Removal  
 Waste Removal (Closed-loop systems only)  
 On-site Closure Method (Only for temporary pits and closed-loop systems)  
 In-place Burial  On-site Trench Burial  
 Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

15. **Waste Excavation and Removal Closure Plan Checklist:** (19.15.17.13 NMAC) *Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.*

- Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
- Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)
- Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

16. **Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:** (19.15.17.13.D NMAC)

*Instructions: Please indentify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.*

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_  
 Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *will not* be used for future service and operations?  
 Yes (If yes, please provide the information below)  No

- Required for impacted areas which will not be used for future service and operations:*
- Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
  - Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
  - Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

17. **Siting Criteria (regarding on-site closure methods only):** 19.15.17.10 NMAC

*Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.*

- |   |   |
|---|---|
| Ground water is less than 50 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Ground water is between 50 and 100 feet below the bottom of the buried waste<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells  | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Ground water is more than 100 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells  | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).<br>- Topographic map; Visual inspection (certification) of the proposed site  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.<br>- NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended.<br>- Written confirmation or verification from the municipality; Written approval obtained from the municipality   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 500 feet of a wetland.<br>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within the area overlying a subsurface mine.<br>- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within an unstable area.<br>- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within a 100-year floodplain.<br>- FEMA map   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |

18. **On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) *Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.*

- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
- Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of 19.15.17.11 NMAC
- Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
- Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
- Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
- Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
- Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

19.

**Operator Application Certification:**

I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): Steve Johnson

Title: SR. Production

Signature: [Handwritten Signature]

Date: 7/1/09

e-mail address: \_\_\_\_\_

Telephone: (432) 683-2277

20.

**OCD Approval:**  Permit Application (including closure plan)  Closure Plan (only)  OCD Conditions (see attachment)

OCD Representative Signature: \_\_\_\_\_ Approval Date: \_\_\_\_\_

Title: \_\_\_\_\_ OCD Permit Number: \_\_\_\_\_

21.

**Closure Report (required within 60 days of closure completion):** Subsection K of 19.15.17.13 NMAC

*Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.*

Closure Completion Date: \_\_\_\_\_

22.

**Closure Method:**

- Waste Excavation and Removal  On-Site Closure Method  Alternative Closure Method  Waste Removal (Closed-loop systems only)
- If different from approved plan, please explain.

23.

**Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:**

*Instructions: Please indentify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.*

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Were the closed-loop system operations and associated activities performed on or in areas that will not be used for future service and operations?

- Yes (If yes, please demonstrate compliance to the items below)  No

*Required for impacted areas which will not be used for future service and operations:*

- Site Reclamation (Photo Documentation)
- Soil Backfilling and Cover Installation
- Re-vegetation Application Rates and Seeding Technique

24.

**Closure Report Attachment Checklist:** *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

- Proof of Closure Notice (surface owner and division)
- Proof of Deed Notice (required for on-site closure)
- Plot Plan (for on-site closures and temporary pits)
- Confirmation Sampling Analytical Results (if applicable)
- Waste Material Sampling Analytical Results (required for on-site closure)
- Disposal Facility Name and Permit Number
- Soil Backfilling and Cover Installation
- Re-vegetation Application Rates and Seeding Technique
- Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude \_\_\_\_\_ Longitude \_\_\_\_\_ NAD:  1927  1983

25.

**Operator Closure Certification:**

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): \_\_\_\_\_

Title: \_\_\_\_\_

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

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

e-mail address: \_\_\_\_\_

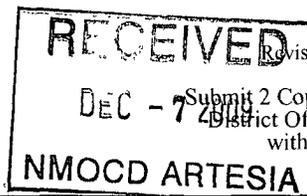
Telephone: \_\_\_\_\_

**Appendix B**  
**Release Notification &**  
**Corrective Action (Form C-141)**

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

State of New Mexico  
Energy Minerals and Natural Resources

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



Form C-141  
Revised October 10, 2003  
Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

30-015-05829

Release Notification and Corrective Action

OPERATOR

Initial Report  Final Report

Name of Company BOPCO, L.P. <u>260737</u>	Contact Tony Savoie
Address 522 W. Mermod, Suite 704 Carlsbad, N.M. 88220	Telephone No. 432-556-8730
Facility Name: G.H. Cobb Federal #1	Facility Type E&P

Surface Owner Federal	Mineral Owner Federal	Lease No. 30-015-05829
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
M	23	20S	31E					Eddy

Latitude N 32.33'11.412 Longitude W 103.50'44.304

NATURE OF RELEASE

Type of Release: Produced water, and crude oil sediment	Volume of Release: Un-known	Volume Recovered: 0
Source of Release: Un-lined evaporation pit	Date and Hour of Occurrence Pre 2009	Date and Hour of Discovery 7/1/09
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\* Operation of the pit ceased prior to 7/1/09, approximately 4000 cubic yards of soil has been removed

Describe Area Affected and Cleanup Action Taken.\* Pasture land measuring approximately 80 ft. by 80ft. A remediation closure plan was submitted to the NMOCD on 11/20/09. The area will be partially backfilled, an air rotary rig will be used to define the vertical and horizontal extent of the pit area. A complete remediation and closure plan will be submitted based on the results of the core samples. The pit will be closed under the guidance of the NMOCD pit closure guidelines.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.

Signature: <u>Tony Savoie</u>	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Tony Savoie	Approved by District Supervisor Signed By <u>Mike Demore</u>	
Title: Waste Mgmt. & Remediation Specialist	Approval Date: <u>MAR 24 2010</u>	Expiration Date:
E-mail Address: TASavoie@BassPet.com	Conditions of Approval: REMEDATION per OCD Rules and Guidelines. <u>SUBMIT REMEDIATION PROPOSAL BY: Investigation is ongoing as of 3/24/10</u>	Attached <input type="checkbox"/>
Date: 12/7/09 Phone: 432-556-8730		

\* Attach Additional Sheets If Necessary

PMLB 0934455618

2 RP-369

# **Appendix C**

## **Photographs**



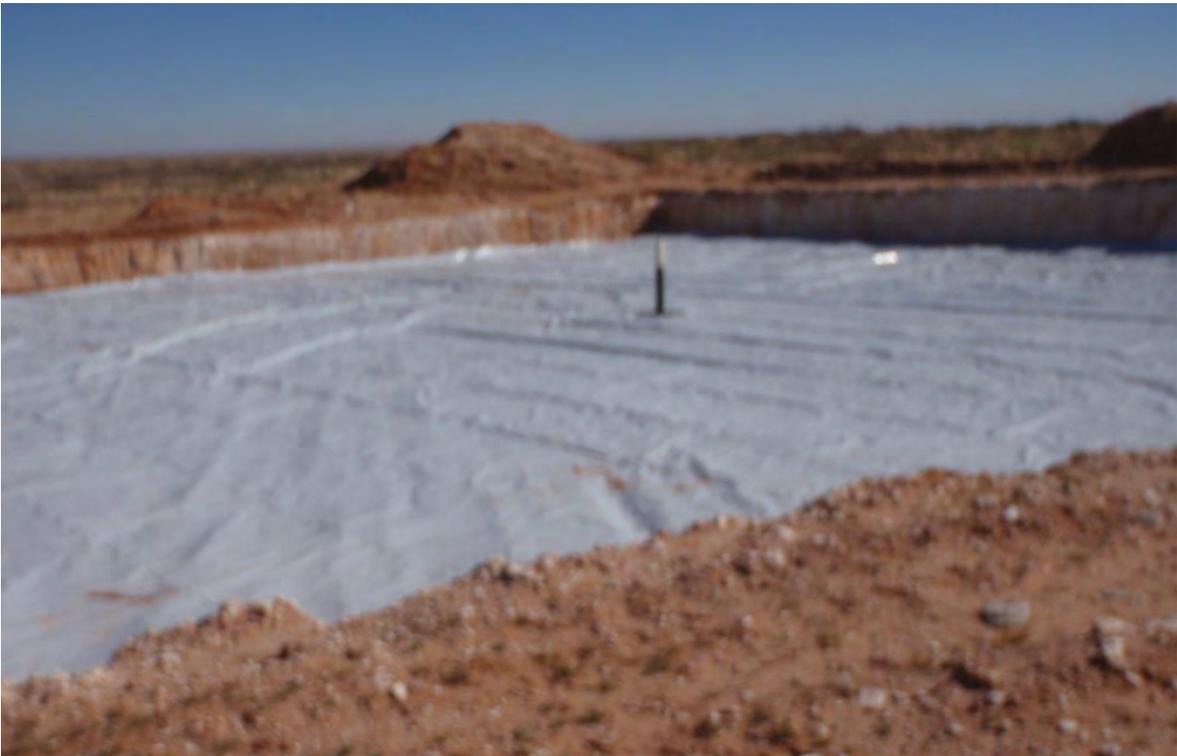
G.H. Cobb Federal #1 - Excavation (prior to backfilling)



G.H. Cobb Federal #1 - Drilling Event (looking Southeast)



G.H. Cobb Federal #1 - Backfilling & Installation of Pad Sand



G.H. Cobb Federal #1 - Liner Installation



G.H. Cobb Federal #1 - Excavation (following liner installation and backfilling)



G.H. Cobb Federal #1 - Excavation (prior to seeding; looking North)



G.H. Cobb Federal #1 - Seeding Event (looking North)



G.H. Cobb Federal #1 - Seeding Event (looking East)

**Appendix D**  
**Soil Boring & Monitor Well Logs**

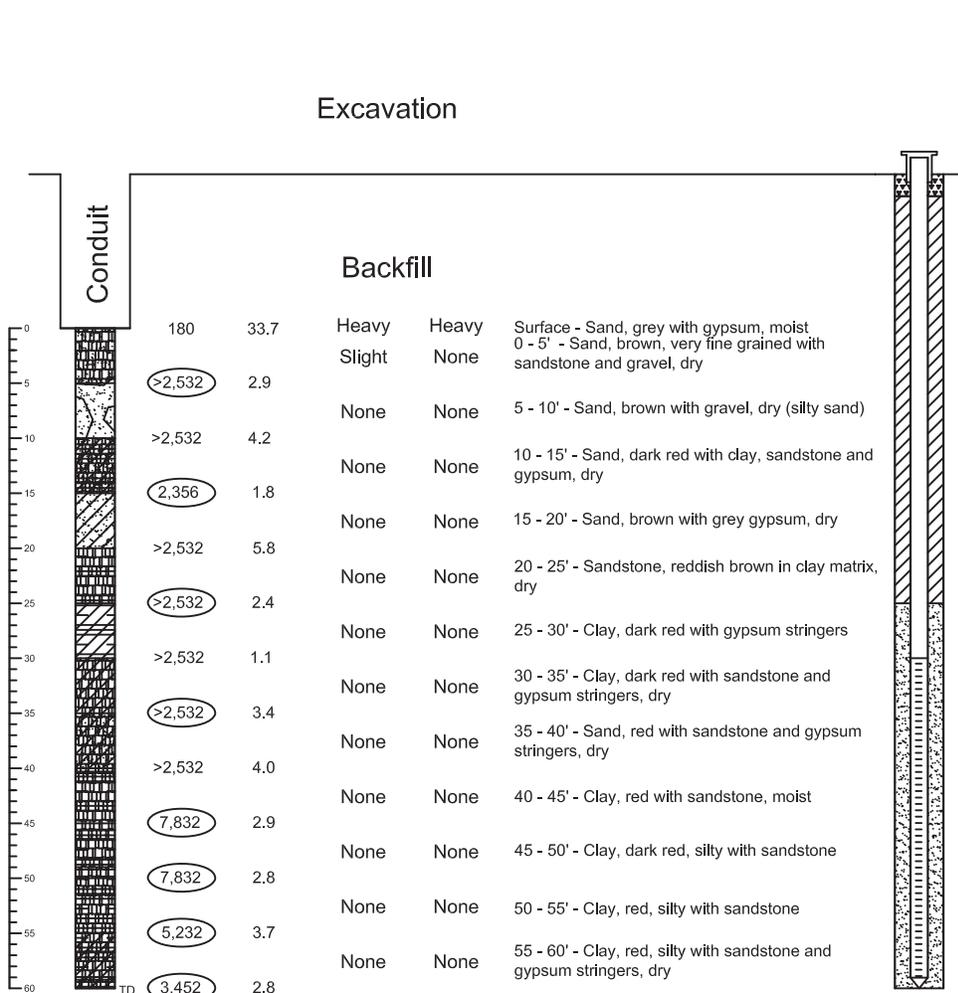


# Monitor Well MW-2

Monitor Well MW-2

Depth  
below  
ground  
surface

Drilling Soil Chloride PID Petroleum Petroleum  
Depth Columns Field Test Reading Odor Stain Soil Description



Date Drilled December 30, 2009  
 Thickness of Bentonite Seal 53 Ft  
 Depth of Exploratory Boring 60 Ft bgs  
 Depth to Groundwater \_\_\_\_\_  
 Ground Water Elevation \_\_\_\_\_

▼ Indicates the PSH level measured on \_\_\_\_\_  
 ▼ Indicates the groundwater level measured on \_\_\_\_\_  
 ○ Indicates samples selected for Laboratory Analysis.  
 PID Head-space reading in ppm obtained with a photo-ionization detector.

- ▼ Grout Surface Seal
- ▨ Bentonite Pellet Seal
- ▤ Sand Pack
- ▭ Screen

### Completion Notes

- 1.) The monitor well was advanced on date using air rotary drilling techniques.
- 2.) The well was constructed with 2" ID, 0.010 inch factory slotted, threaded joint, schedule 40 PVC pipe.
- 3.) The well is protected with a locked stick up steel cover and compression cap.
- 4.) The lines between material types shown on the profile log represent approximate boundaries. Actual transitions may be gradual.

Monitor Well Details  
 MW-2  
 Soil Boring SB-2

BOPCO, LP  
 G.H. Cobb Federal #1  
 Eddy County, New Mexico

Basin Environmental Service Technologies

Prep By: CDS	Checked By: CJB
May 13, 2010	

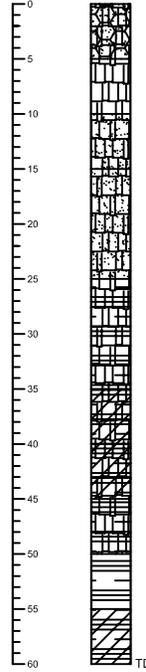
# Soil Boring SB-3

Soil Boring SB-3

Depth  
below  
ground  
surface

Drilling    Soil    Chloride    PID    Petroleum    Petroleum  
Depth    Columns    Field Test    Reading    Odor    Stain    Soil Description

Date Drilled January 5, 2010  
 Thickness of Bentonite Seal 60 Ft  
 Depth of Exploratory Boring 60 Ft bgs  
 Depth to Groundwater \_\_\_\_\_  
 Ground Water Elevation \_\_\_\_\_



Drilling Depth	Soil Columns	Chloride Field Test	PID Reading	Petroleum Odor	Petroleum Stain	Soil Description
Excavation						
0		708	4.5	None	None	Surface - Caliche, tan, sandy, dry
5				None	None	0 - 5' - Sand, brown, very fine grained with sandstone, dry
10		416	3.0	None	None	5 - 10' - Sandstone, brown, silty, dry
15		416	2.7	None	None	10 - 15' - Sand, brown with sandstone, dry
20		416	4.8	None	None	15 - 25' - Sand, brown, very fine grained with sandstone, dry
25		7,224	3.9	None	None	
30		3,452	3.8	None	None	25 - 35' - Clay, red, silty with sandstone, dry
35		3,452	2.3	None	None	
40		6,664	6.8	None	None	35 - 40' - Clay, red with sandstone and some gypsum, some moisture
45		9,232	6.4	None	None	40 - 45' - Clay, dark red, silty with sandstone and gypsum stringers
50		6,664	3.3	None	None	45 - 50' - Clay, dark red, silty with sandstone, moist
55		2,892	2.9	None	None	50 - 55' - Clay, dark red, damp
60		3,452	2.7	None	None	55 - 60' - Clay, dark red with gypsum stringers, damp
65		3,452	2.5	None	None	
70						
75						

▼ Indicates the PSH level measured on \_\_\_\_\_  
 ▼ Indicates the groundwater level measured on \_\_\_\_\_  
 ○ Indicates samples selected for Laboratory Analysis.  
 PID Head-space reading in ppm obtained with a photo-ionization detector.

Completion Notes

- 1.) The monitor well was advanced on date using air rotary drilling techniques.
- 2.) The lines between material types shown on the profile log represent approximate boundaries. Actual transitions may be gradual.

Soil Boring SB-3

BOPCO, LP  
 G.H. Cobb Federal #1  
 Eddy County, New Mexico

Basin Environmental Service Technologies

Prep By: CDS	Checked By: CJB
May 14, 2010	

# Soil Boring SB-4

Boring SB-4

Depth  
below  
ground  
surface



Soil Columns	Chloride Field Test	PID Reading	Petroleum Odor	Petroleum Stain	Soil Description
	ND	1.7	None	None	
		1.8	None	None	Surface - 5' - Sand, brown, very fine grained
		1.5	None	None	5 - 10' - Caliche, tan, sandy, dry
	128	1.8	None	None	10 - 15' - Sand, brown, very fine grained, with caliche, dry
	180	2.5	None	None	15 - 20' - Sand, brown, with sandstone, dry
	212	3.8	None	None	20 - 25' - Sand, brown, very fine grained with sandstone, dry
	3,452	4.1	None	None	25 - 30' - Sand, brown, very fine grained with some clay and sandstone, dry
	6,148	2.2	None	None	30 - 35' - Sand and sandstone, brown with gypsum stringers, dry
	1,960	2.3	None	None	35 - 40' - Clay, reddish brown, sandy with sandstone, dry
	5,232	3.7	None	None	40 - 45' - Sandstone, reddish brown, dense, hard with clay
	2,636	5.9	None	None	45 - 50' - Sandstone, red in clay matrix, dry
	6,148	4.3	None	None	50 - 55' - Sand, brown with sandstone and some clay, dry
	2,396	3.6	None	None	55 - 60' - Sandstone, reddish brown, coarse grained with clay matrix
	13,028	2.0	None	None	60 - 65' - Clay, red, silty with sandstone and grey gypsum, damp
	11,920	4.0	None	None	65 - 70' - Clay, dark red with sandstone, damp
	11,920	2.4	None	None	70 - 75' - Clay, dark red, silty with sandstone, wet
	5,672				

Date Drilled January 5, 2010  
 Thickness of Bentonite Seal 75 Ft  
 Depth of Exploratory Boring 75 Ft bgs  
 Depth to Groundwater \_\_\_\_\_  
 Ground Water Elevation \_\_\_\_\_

▼ Indicates the PSH level measured on \_\_\_\_\_  
 ▼ Indicates the groundwater level measured on \_\_\_\_\_  
 ○ Indicates samples selected for Laboratory Analysts.  
 PID Head-space reading in ppm obtained with a photo-ionization detector.

Completion Notes

- 1.) The monitor well was advanced on date using air rotary drilling techniques.
- 2.) The lines between material types shown on the profile log represent approximate boundaries. Actual transitions may be gradual.

Soil Boring SB-4

BOPCO, LP  
 G.H. Cobb Federal #1  
 Eddy County, New Mexico

Basin Environmental Service Technologies

Prep By: CDS	Checked By: CJB
May 14, 2010	

# Soil Boring SB-5

Boring SB-5

Depth below ground surface



Soil Columns	Chloride Field Test	PID Reading	Petroleum Odor	Petroleum Stain
	ND	1.2	None	None
	676	1.8	None	None
	676	1.7	None	None
	572	1.2	None	None
	396	1.9	None	None
	1,340	1.9	None	None
	436	0.7	None	None
	1,244	1.5	None	None
	1,340	2.2	None	None
	5,232	1.9	None	None
	4,092	2.1	None	None
	3,164	2.3	None	None
	4,444	1.7	None	None
	6,664	1.9	None	None
	856	2.0	None	None
	3,164	1.5	None	None
	13,028	1.1	None	None

**Soil Description**

Surface - Sand, brown with organics, dry

0 - 10' - Sand, tan with caliche nodules, dry

10 - 20' - Sand, tan, very fine grained, with caliche, dry

20 - 25' - Sand, brown with sandstone, dry

25 - 30' - Sand, brown, very fine grained with sandstone, dry

30 - 35' - Sand, reddish brown with clay, sandstone and gypsum stringers, layering, dry

35 - 40' - Sand, red with limited clay and sandstone, dry

40 - 45' - Clay, red with gypsum, dry

45 - 50' - Sand, reddish brown with clay and sandstone, dry

50 - 55' - Sand, brown, very fine grained with grey gypsum, layering, dry

55 - 60' - Sand, brown, very fine grained with sandstone and some clay, dry

60 - 65' - Sandstone, reddish brown in clay matrix, dry

65 - 70' - Sandstone, dark red with clay and grey gypsum, layered, dry

70 - 75' - Sandstone, reddish brown in silty clay, dry

75 - 80' - Clay, dark red, moist

Date Drilled January 5, 2010  
 Thickness of Bentonite Seal 80 Ft  
 Depth of Exploratory Boring 80 Ft lgs  
 Depth to Groundwater \_\_\_\_\_  
 Ground Water Elevation \_\_\_\_\_

▼ Indicates the PSH level measured on \_\_\_\_\_  
 ▼ Indicates the groundwater level measured on \_\_\_\_\_  
 ○ Indicates samples selected for Laboratory Analysis.  
 PID Head-space reading in ppm obtained with a photo-ionization detector.

**Completion Notes**

- 1.) The monitor well was advanced on date using air rotary drilling techniques.
- 2.) The lines between material types shown on the profile log represent approximate boundaries. Actual transitions may be gradual.

Soil Boring SB-5

BOPCO, LP  
 G.H. Cobb Federal #1  
 Eddy County, New Mexico

Basin Environmental Service Technologies

Prep By: CDS	Checked By: CJB
May 14, 2010	

# Soil Boring SB-6

Soil Boring SB-6

Depth below ground surface



Soil Columns	Chloride Field Test	PID Reading	Petroleum Odor	Petroleum Stain	Soil Description
	ND	1.2	None	None	Surface - Sand, reddish brown, with caliche nodules
	529	2.9	None	None	0 - 10' - Sand, tan with soft caliche, dry
	436	2.5	None	None	
	356	3.7	None	None	10 - 15' - Sand, brown with sandstone, dry
	188	4.5	None	None	15 - 20' - Sand, tan to brown, very fine grained with sandstone, dry
	792	5.2	None	None	
	5,232	3.6	None	None	20 - 40' - Sand, brown, very fine grained with sandstone, dry
	6,664	2.8	None	None	
	3,452	7.9	None	None	
	3,452	2.3	None	None	40 - 45' - Sandstone, dark red in clay matrix, dry
	4,824	3.1	None	None	45 - 50' - Sandstone, layered brown to grey, with gypsum, dry
	3,452	3.1	None	None	50 - 55' - Sandstone, brown, very fine grained, dry
	5,232	5.2	None	None	55 - 60' - Clay, reddish brown, silty with sandstone, dry
	7,832	4.4	None	None	60 - 65' - Clay, dark red, sandy with sandstone, dry
	13,028	1.9	None	None	65 - 70' - Clay, dark red, sandstone layering, moist
	10,040				

Date Drilled January 6, 2010  
 Thickness of Bentonite Seal 70 Ft  
 Depth of Exploratory Boring 70 Ft bgs  
 Depth to Groundwater \_\_\_\_\_  
 Ground Water Elevation \_\_\_\_\_

▼ Indicates the PSH level measured on \_\_\_\_\_  
 ▼ Indicates the groundwater level measured on \_\_\_\_\_  
 ○ Indicates samples selected for Laboratory Analysis.  
 PID Head-space reading in ppm obtained with a photo-ionization detector.

### Completion Notes

- 1.) The monitor well was advanced on date using air rotary drilling techniques.
- 2.) The lines between material types shown on the profile log represent approximate boundaries. Actual transitions may be gradual.

Soil Boring SB-6

BOPCO, LP  
 G.H. Cobb Federal #1  
 Eddy County, New Mexico

Basin Environmental Service Technologies

Prep By: CDS	Checked By: CJB
May 14, 2010	

# Soil Boring SB-7

Soil Boring SB-7

Depth below ground surface



Soil Columns	Chloride Field Test	PID Reading	Petroleum Odor	Petroleum Stain	Soil Description
		2.9	None	None	0 - 5' - Sand, tan to grey, very fine grained, moist (snow melt), dry at 6-inches
(ND)		2.5	None	None	5 - 8' - Sand, tan to grey, very fine grained with some caliche nodules, dry
ND		3.7	None	None	8 - 11' - Caliche, white, dry, sandy
(180)		4.5	None	None	11 - 15' - Sand, brown with some caliche layers
180		5.2	None	None	15 - 22' - Sand, brown with some caliche and red clay
(324)		3.6	None	None	22 - 25' - Sand, brown with some caliche
6,664		2.8	None	None	25 - 30' - Sandstone, brown, moderately hard
(9,232)		7.9	None	None	30 - 34' - Sandstone, brown, moderately hard with some gypsum and clay
3,760		2.3	None	None	34 - 40' - Clay, red and sandstone, red, very hard with some gypsum
(5,232)		3.1	None	None	40 - 52' - Sandstone, brown to red in red clay matrix, moderate to very hard, thin layering with some gypsum
3,760		3.1	None	None	52 - 55' - Gypsum, white to grey
(4,444)		5.2	None	None	55 - 65' - Sandstone, red, moderately hard with red clay matrix
(8,500)		4.4	None	None	65 - 70' - Sandstone, red, moderately hard with red clay matrix and some gypsum stringers
(2,636)		1.9	None	None	70 - 75' - Sandstone, red, hard, moist
(2,172)		1.9			
(10,040)					

Date Drilled January 11, 2010  
 Thickness of Bentonite Seal 75 Ft  
 Depth of Exploratory Boring 75 Ft lbs  
 Depth to Groundwater \_\_\_\_\_  
 Ground Water Elevation \_\_\_\_\_

- ▼ Indicates the PSH level measured on \_\_\_\_\_
- ▼ Indicates the groundwater level measured on \_\_\_\_\_
- Indicates samples selected for Laboratory Analysis.
- PID Head-space reading in ppm obtained with a photo-ionization detector.

### Completion Notes

- 1.) The monitor well was advanced on date using air rotary drilling techniques.
- 2.) The lines between material types shown on the profile log represent approximate boundaries. Actual transitions may be gradual.

Soil Boring SB-7

BOPCO, LP  
 G.H. Cobb Federal #1  
 Eddy County, New Mexico

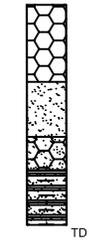
Basin Environmental Service Technologies

Prep By: CDS	Checked By: CJB
May 14, 2010	



# Soil Boring SB-9

Depth  
below  
ground  
surface



Soil Columns	Chloride Field Test	PID Reading	Petroleum Odor	Petroleum Stain	Soil Description
			None	None	Surface - Caliche lease road
	1,000	6.5	None	None	0 - 7' - Caliche, white
	520	3.7	None	None	7 - 12' - Sand, brown, dry
	132	4.2	None	None	12 - 15' - Sand, brown with caliche nodules
	128	3.7	None	None	15 - 20' - Caliche, white and sand, brown with some brown clay

## Soil Boring SB-9

Date Drilled January 12, 2010  
 Thickness of Bentonite Seal 20 Ft  
 Depth of Exploratory Boring 20 Ft bgs  
 Depth to Groundwater \_\_\_\_\_  
 Ground Water Elevation \_\_\_\_\_

- ▼ Indicates the PSH level measured on \_\_\_\_\_
- ▼ Indicates the groundwater level measured on \_\_\_\_\_
- Indicates samples selected for Laboratory Analysis.
- PID Head-space reading in ppm obtained with a photo-ionization detector.

### Completion Notes

- 1.) The monitor well was advanced on date using air rotary drilling techniques.
- 2.) The lines between material types shown on the profile log represent approximate boundaries. Actual transitions may be gradual.

Soil Boring SB-9

BOPCO, LP  
 G.H. Cobb Federal #1  
 Eddy County, New Mexico

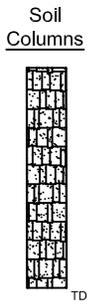
Basin Environmental Service Technologies

Prep By: CDS	Checked By: CJB
May 14, 2010	

# Soil Boring SB-10

Soil Boring SB-10

Depth  
below  
ground  
surface



Soil Columns	Chloride Field Test	PID Reading
	○	
	○	
	○	

Petroleum Odor	Petroleum Stain
None	None

**Soil Description**  
 Surface - Sand, light brown, very fine grained with some clay  
  
 0 - 20' - Sand, white to light brown to brown with sandstone

Date Drilled January 12, 2010  
 Thickness of Bentonite Seal 20 Ft  
 Depth of Exploratory Boring 20 Ft bgs  
 Depth to Groundwater \_\_\_\_\_  
 Ground Water Elevation \_\_\_\_\_

- ▼ Indicates the PSH level measured on \_\_\_\_\_
- ▼ Indicates the groundwater level measured on \_\_\_\_\_
- Indicates samples selected for Laboratory Analysts.
- PID Head-space reading in ppm obtained with a photo-ionization detector.

Completion Notes

- 1.) The monitor well was advanced on date using air rotary drilling techniques.
- 2.) The lines between material types shown on the profile log represent approximate boundaries. Actual transitions may be gradual.

Soil Boring SB-10

BOPCO, LP  
 G.H. Cobb Federal #1  
 Eddy County, New Mexico

Basin Environmental Service Technologies

Prep By: CDS	Checked By: CJB
May 14, 2010	







**Appendix E**  
**Laboratory Analytical Reports**