

October 11, 2017

#5E25852-BG3

NMOCD District II Mike Bratcher 811 S. First St. Artesia, NM 88210

SUBJECT: SOIL REMEDIATION WORK PLAN FOR THE INCIDENT AT THE Brushy Creek Gathering Station RELEASE, EDDY COUNTY, NEW MEXICO

Dear Mr. Bratcher,

On behalf of WPX Energy, Souder, Miller & Associates (SMA) has prepared this WORK PLAN that describes the assessment, initial delineation and proposed remediation for releases associated with the Brushy Creek Gathering Station releases. The site is in UNIT M, SECTION 25, TOWNSHIP 26S, RANGE 29E, NMPM, Eddy County, New Mexico, on Bureau of Land Management land. Figure 1 illustrates the vicinity and location of the site.

Table 1, below, summarizes information regarding the release.

Table 1: Rele	ease information and Site Ranking
Name	Brushy Creek Gathering Station
Company	WPX Energy
RP Number	2RP-3811, 2RP-2742, 2RP-2796,2RP-3195
API Number	30-015-24451
Location	32.005758° -103.944660°
Estimated Date of Release	Various
Date Reported to NMOCD	Various
Land Owner	Federal
Reported To	Mike Bratcher
Source of Release	See Attached C-141
Released Material	See Attached C-141
Released Volume	See Attached C-141
Recovered Volume	See Attached C-141
Net Release	See Attached C-141
Nearest Waterway	0.9 Miles from Red Bluff Lake
Depth to Groundwater	Estimated to be less than 100'
Nearest Domestic Water Source	Greater than 1,000 feet
NMOCD Ranking	10

#### 1.0 Background

This location currently has four open Remediation Permits for the location including: 2RP-3811, 2RP-2742, 2RP-2796, 2RP-3195. Equipment failures and human error have been the reasoning for the releases on the location. The impacted area is approximately 200 feet long by 100 feet wide. Release area is shown in Figure 2 and in Figure 3.

#### 2.0 Site Ranking and Land Jurisdiction

The release site is located approximately 0.9 miles north of the Red Bluff Lake, with an elevation of approximately 2,882 feet above sea level. SMA searched the New Mexico State Engineer's Office (NMOSE) online water well database for water wells in the vicinity of the release. Three wells are located within a three-mile radius of the site. Using a boring 0.4 miles southeast of location, drilled by SMA on September 13, 2017 no water was found at 70' bgs. After evaluation of the site using aerial photography and topographic maps, depth to groundwater is estimated to be less than 100 feet below ground surface (bgs).

Recommended Remediation Action Levels (RRALs) are determined by the site ranking according to the NMOCD *Guidelines for Remediation of Leaks, Spills, and Releases* (1993). Below in Table 2 are the remediation standards and the site ranking for this location. Justification for this site ranking is found in Figure 1 and Appendix B.

Table 2.

Soil Remediation Standards	0 to 9	10 to 19	>19
Benzene	10 PPM	10 PPM	10 PPM
BTEX	50 PPM	50 PPM	50 PPM
ТРН	5000 PPM	1000 PPM	100 PPM

Depth to Groundwater	NMOCD Numeric Rank
< 50 BGS = 20	
50' to 99' = 10	10
>100' = 0	
Distance to Nearest Surface Water	NMOCD Numeric Rank
< 200' = 20	
200' - 1000' = 10	
>1000' = 0	0
Well Head Protection	NMOCD Numeric Rank
<1000' (or <200' domestic) = 20	
> 1000' = 0	0
Total Site Ranking	0

#### 3.0 Release Characterization

On September 4, November 14, 2016, January 24 and 26, 2017 WPX staff collected samples and Vertex conducted a Geophysical Survey of the Area refer to APPENDIX C for further information

concerning the release data. The surface impact is estimated to be 2,115 square yards. This area encompasses the Brushy Creek Gathering Station with associated tank battery, equipment and buried lines. In Appendix D a model was used to determine the risk to groundwater.

#### 4.0 Soil Remediation Workplan

SMA will oversee licensed driller to conduct a soil boring to delineate affected soils. After approval from area utilities owners via 811 and NMOCD. SMA will continuously guide the boring activities with a by collecting composite soil samples and logging geology downhole for field screening with a mobile titration unit (EPA 4500). The samples will be sent under chain-of-custody protocols to Hall Environmental Analysis Laboratory for analyses including chlorides by Method 300.0, volatile organics (BTEX) by Method 8021B, and MRO, DRO, and GRO by EPA Method 8015D.

After delineation samples are submitted requested for deferment is being asked for this location. This area cannot be excavated due to the proximity of the operational equipment and un located buried pipelines.

#### 5.0 Scope and Limitations

The scope of our services consisted of the performance of assessment sampling, verification of release stabilization, regulatory liaison, and preparation of this work plan. All work has been performed in accordance with generally accepted professional environmental consulting practices for oil and gas releases in the Permian Basin in New Mexico.

If there are any questions regarding this report, please contact either Austin Weyant at 575-689-8801 or Shawna Chubbuck at 505-325-7535.

Submitted by:

SOUDER. MILLER & ASSOCIATES

Mush Newant

Austin Weyant Project Scientist

Reviewed by:

Jennifer Knowlton, PE Senior Engineer II

#### **ATTACHMENTS:**

#### Figures:

Figure 1: Vicinity and Well Head Protection Map

Figure 2: Site and Sample Location Map

#### Tables:

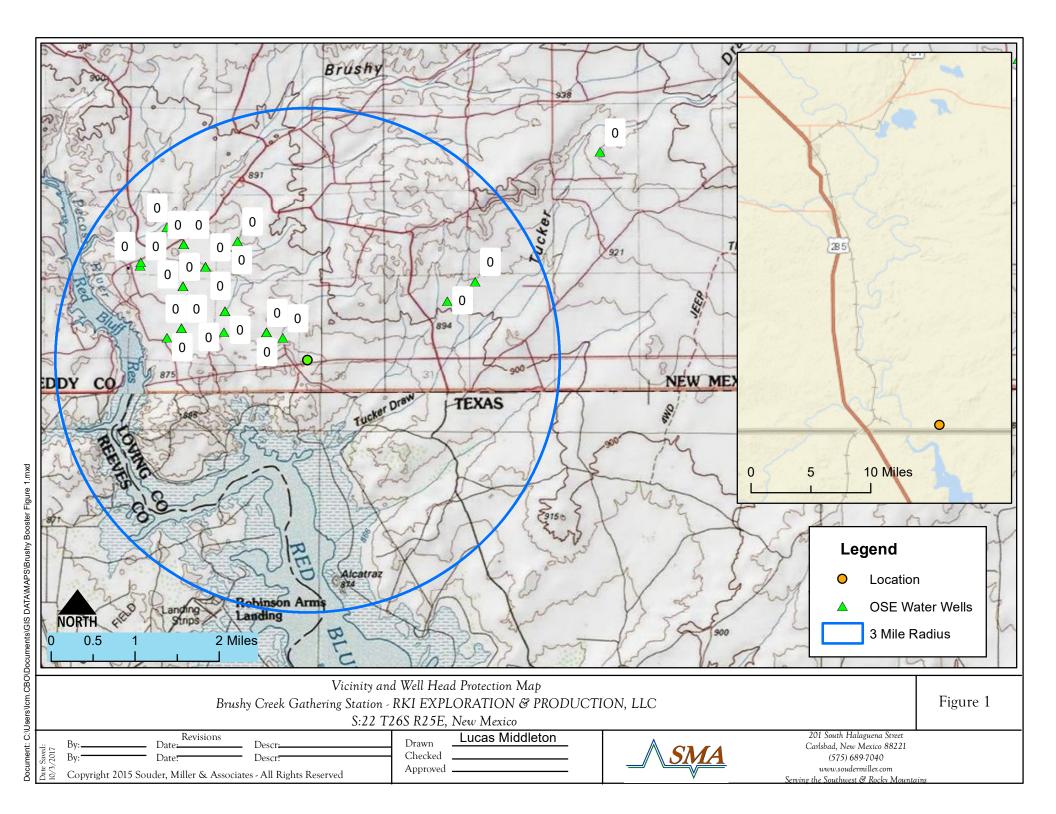
Table 3: Summary of Sample Results

#### Appendices:

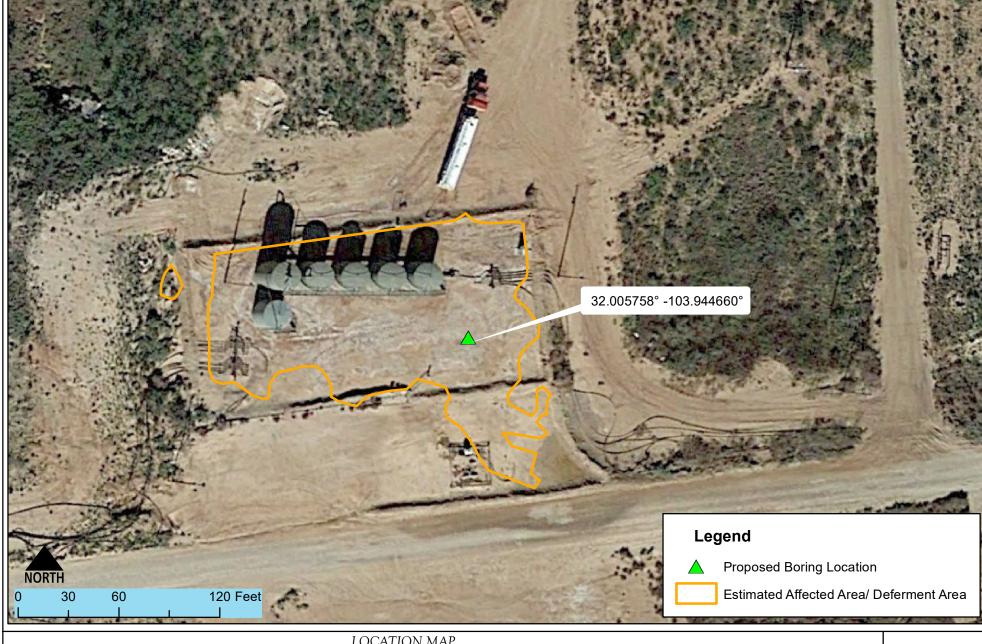
Appendix A: Form C141 Initial and Final Appendix B: NMOSE Wells Report

Appendix C: Laboratory Analytical Reports
Appendix D: Groundwater Impact Risk Model

# FIGURE 1 VICINITY AND NMOSE DATA MAP



## FIGURE 2 LOCATION MAP



LOCATION MAP Brushy Creek Gathering Station S:25 T26S R29E, New Mexico

Figure 2

 Drawn Lucas Middleton
Checked Approved



201 South Halaguena Street Carlsbad, New Mexico 88221 (575) 689-7040 www.soudermiller.com Serving the Southwest & Rocky Moun

### APPENDIX A FORM C141 INITIALS

#### NM OIL CONSERVATION

ARTESIA DISTRICT **Energy Minerals and Natural Resources** 

Form C-141

JUL 28 2016

Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC. RECEIVED

#### <u>District 1</u> 1625 N. French Dr., Hobbs, NM 88240 District II 811 S. First St., Artesia, NM 88210 District III 1000 Rio Brazos Road, Aztec, NM 87410 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505

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

State of New Mexico

#### Release Notification and Corrective Action

NABIL	2145	3181	Ken	ease Mounte	ation	OPERAT		ction	] Initia	al Report		Final Report
Name of Co		WPX Energ	y Inc/RK	1 24-428	4 1	Contact	Karolina Blan	ey	-	<del></del>		-
Address	5315 Bu	ena Vista Di	Γ.		′	Telephone N	No. 970 589 074	3				
Facility Nan	ne: Brushy	Draw Boos	ter Static	n/Fed UCBHWV	V 1 1	Facility Typ	e: Tank Farm					
Surface Owi	ner: Feder	ral		Mineral O	wner: I	Federal			API No	. 30- 015-2	4034	
				LOCA	TION	OF REI	LEASE	·				
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	☐ Yes ☐ No ☒ Not Required NMOCD Heather Patterson & Michael Bratcher, BLM Shelly Tucker											
By Whom? Karolina Blaney Date and Hour: 7/14/16–1645 hrs MT												
Was a Watero	course Reac		Yes ⊠	] No		If YES, Vo	lume Impacting t	he Waterc	ourse.			
If a Watercou	f a Watercourse was Impacted, Describe Fully.* N/A											
		•	•									
Describe Cau	se of Probl	em and Reme	dial Actio	n Taken.*								,
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Describe Are	a Affected	and Cleanup A	Action Tal	cen.*		. ,						
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regulations al public health should their cor the environ	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.											
,	Karolina	Blaney					OIL CON	<u>SERVA</u>	TION	DIVISIO	N	
Signature:	140,000	J					Ciama 1 D		/ /	,		
Printed Name	e: Karolina	Blaney				Approved by	Signed By Environmental S	pecialist	4 2	Control	<del></del>	
Title: Enviro	onmental Sp	pecialist				Approval Da	te: 7/28/	l (p   Ex	piration	Date: N	A	
E-mail Addre	ess: Karoli	na.blancy@w	pxenergy.	com	<u></u>	Conditions o	Approvalion per O.C.D	Rules	& Guid	elines Attached		
Date: 7/28/2	2016		Phor	e: 970-589-0743		SUBMIT F	REMEDIATION	1P897/	JOHL I	<u> </u>		4011
Attach Addi	tional She	ets If Necess	ary			LATER TH	IAN:972	117		7	LKP	'-J81T

#### Bratcher, Mike, EMNRD

From: Blaney, Karolina < Karolina.Blaney@wpxenergy.com>

**Sent:** Thursday, July 28, 2016 6:47 AM

To: Tucker, Shelly; Patterson, Heather, EMNRD; Bratcher, Mike, EMNRD

**Subject:** RE: WPX - Brushy Draw Tank Farm - C 141 **Attachments:** Brushy Draw Booster Station - Initial C-141.doc

#### Good morning,

Attached is the initial C-141 for the Brushy Draw Booster Station. Please let me know if you have any comments or concerns. Thank you and have a great day.

#### Karolina Blaney

Environmental Specialist WPX Energy Office: (575) 885-7514

Office: (575) 885-7514 Cell: (970) 589-0743

karolina.blaney@wpxenergy.com

From: Blaney, Karolina

Sent: Thursday, July 14, 2016 4:48 PM

To: 'Tucker, Shelly' <stucker@blm.gov>; 'heather.patterson@state.nm.us' <heather.patterson@state.nm.us>;

'mike.bratcher@state.nm.us' <mike.bratcher@state.nm.us> **Subject:** WPX - Brushy Draw Tank Farm - spill notification

#### Good afternoon.

WPX had a produced water spill last night at the Brushy Draw Tank Farm. The Tank Farm is located south of the FED USBH 1 well, API # 30-015-24034. The legal description is S25, T26S, R29E. Coordinates: 32.0056803, -103.9439288. The cause of the spill is equipment failure; a poly line running from the tank farm to an injection well ruptured. The compromised section of the line is located outside the SPCC containment but there was enough pressure in the line to spray it into the containment. The vast majority of spilled water was contained inside the dirt containment berm, approximately 5 bbls of produced water was sprayed outside the containment on the access road. The total volume spilled and recovered is unknown as we are adding up the hauling tickets but it is expected to be more than 100 bbls. I will be submitting the C-141 and NTL-3A (if preferred) in the next 15 days. However, please don't hesitate to call if you have any questions, comments, or concerns.

Thank you and have a great afternoon,

#### Karolina Blaney

Environmental Specialist WPX Energy

Office: (575) 885-7514 Cell: (970) 589-0743

karolina.blaney@wpxenergy.com

District 1
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

#### State of New Mexico Energy Minerals and Natural Resources

Form C-141 Revised August 8, 2011

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

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Name of Co		RKI E&P, L		244986	, ,	Contact	Taylor Jones					
Address				C, OK 73102			No. 405-996-57					
Facility Nar	ne: Brush	ny Creek Gat	thering S	tation		Facility Typ	e: Tank Battery	/				
Surface Ow	ner Federa	al		Mineral O	wner	NA			API No	. 30-015-24451		
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Printed Name	e: Taylor Jo	nes				pp.o.o.o.		Poolarist	110	Wan		
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#### Patterson, Heather, EMNRD

From:

Taylor Jones <TJones@rkixp.com>

Sent:

Thursday, February 05, 2015 2:44 PM

To:

'Heather.Patterson@state.nm.us'

Cc:

shughes@blm.gov; Zackary Laird

Subject:

RKI E&P Spill Notification and C-141

**Attachments:** 

NM\_BrushyCreekGatheringStation\_InitialC141(020515)-signed.pdf

#### Heather,

Attached please find completed OCD form C-141 for a spill occurring at the RKI operated Brushy Creek Gathering Station in Eddy County, NM. Please feel free to contact myself or a local RKI representative with any questions. Thank you,

#### Taylor Jones

#### **RKI Exploration & Production, LLC**

210 Park Avenue, Suite 900 Oklahoma City, OK 73102 405-996-5782 (o) | 405.326.0791 (m) Tlones@RKIXP.com

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1000 Rio Brazos Road, Aztec, NM 87410
District III <u>District IV</u> 1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico **Energy Minerals and Natural Resources** 

ARTESIA DISTRICT

Form C-141 Revised August 8, 2011

2RP. 27A2

JAN 16 2015 Oil Conservation Division

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

**RECEIVED** 

1220 South St. Francis Dr. Santa Fe, NM 87505

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Address				C, OK 73102			No. 405-742-26					
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I hereby cert	fy that the	information g	iven above	e is true and compl	ete to th	ne best of my	knowledge and u	nderstand	that purs	suant to NMOC	D rules an	d
regulations a	ll operators	are required t	o report a	nd/or file certain re	elease no	otifications a	nd perform correc	tive actio	ns for rel	eases which ma	ay endange	r
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Title: Sr. El	IS Manager	· 				Approval Da	te: //le/1	) E:	xpiration	Date: No		
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Attach Addi	tional She	ets If Necess				ER THAN:				<u> </u>	100	00

#### Patterson, Heather, EMNRD

From: Zackary Laird <ZLaird@rkixp.com>

**Sent:** Friday, January 16, 2015 9:05 AM

**To:** Patterson, Heather, EMNRD

Cc: Hughes, Solomon

**Subject:** RKI E&P Spill Notification and C-141

Attachments: NM\_BrushyCreekGatheringStation\_InitialC141(011515).pdf

#### Heather,

Attached please find completed OCD form C-141 for a spill occurring at the RKI operated Brushy Creek Gathering Station in Eddy County, NM. I used the legals for the RKI operated UCBH WW Federal 003 (API # 30-015-24451) as it is on the same pad as the gathering battery. I apologize for the delayed report. Please feel free to contact myself or a local RKI representative with any questions.

Kind Regards,

Zack Laird | Sr. EHS Manager

#### **RKI Exploration & Production, LLC**

210 Park Avenue, Suite 900 | Oklahoma City, OK 73102 405.987.2213 (o) | 405.742.2696 (m) | <u>ZLaird@rkixp.com</u>

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District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
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#### State of New Mexico Energy Minerals and Natural Resources

Form C-141 Revised August 8, 2011

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit 1 Copy to appropriate District Office in accordance with 19,15.29 NMAC.

	Release Notification and Corrective Action										
NAB1.	5223	341442		······································	. , .	OPERAT		$\boxtimes$	Initia	Report Final Report	
		RKI E&P, L	<u> </u>	<u> 240284</u>		Contact	Zack Laird	110			
Address Facility Nar		k Ave. – Ste. ny Creek Ga		C, OK 73102			No. 405-987-22 e : Tank Battery				
			thorng o			····	C. Tank Batter				
Surface Ow	ner Feder	al		Mineral C	wner 1	NA		A	PI No.	30-015-24451	
		•				OF REI					
Unit Letter	Section	Township	Range	Feet from the	North/S	South Line	Feet from the	East/West	Line	County	
М	25	268	<b>29</b> E	_	660 FS	SL		660FWL		Eddy	
•						52 Longitu OF REL	de: -103.9444				
Type of Rele	ase. Produ	ced Water	·	IVAI	OKE		Release: 200 Bb	ls	Volume	Recovered: 185 Bbls	
Source of Re						Date and F	lour of Occurrence	e	Date an	d Hour of Discovery 5 – 0800hrs MT	
Was Immedi	ate Notice (									lly Tucker (BLM)	
			Yes [	No Not R	equired						
By Whom? 2 Was a Water		-110			•		Iour 08/10/15 – 1				
was a water	course Rea		Yes ∑	] No		N/A	olume Impacting (	ine waterco	urse.		
If a Watercon	urse was Im	pacted, Desci	ibe Fully.	* N/A							
		•	·								
Describe Cau	use of Prob	lem and Reme	dial Actio	n Taken.*				NM (		ONSERVATION SIA DISTRICT	
Water numn	trinned and	I tanka wan asi	A lowes	was not sent due	to faultu	madam					
					io faulty	modem.			AUG	1 0 2015	
		ks dispatched and Cleanup									
		-							RE	CEIVED	
All fluid rem	ained in se	condary conta	inment, 18	35/200Bbls recove	ered						
regulations a public health should their or the enviro	Il operators or the envious loperations longer	are required in are required in are required in are failed to	to report a c acceptan adequatel DCD acce	nd/or file certain in ce of a C-141 reply investigate and inputance of a C-141	release no ort by the remediate	otifications a c NMOCD m e contaminat	nd perform correct parked as "Final Ricon that pose a thi	ctive actions Leport" does reat to grour	s for rele not reli nd water	cuant to NMOCD rules and eases which may endanger eve the operator of liability surface water, human health ompliance with any other	
Signature:		///		<i>,</i>			OIL CON	SERVA	TION //	DIVISION	
Printed Nam	e: Zack Lai	rd				Approved by	Environmental S	Specialist:	B		
Title: Sr. El		•	-			Approval Da	te: 81019	Exp	piration	Date: NA	
E-mail Addr	ess: Zlaird	@rkixp.com				Conditions o	f Approval:			Attached	
Date: 08/10	)/15		Phone: 40	5-987-2213	70	mediatio	n per O.C.D. I	Rules & d	Guida		
Attach Addi							MEDIATION			0 -	
			•			TER THA		46		2 RP 3190	

#### Patterson, Heather, EMNRD

From:

Zackary Laird <ZLaird@rkixp.com>

Sent:

Monday, August 10, 2015 11:07 AM

To:

Patterson, Heather, EMNRD

Cc:

stucker@blm.gov

Subject:

RKI E&P Spill Notification and C-141

**Attachments:** 

RKI\_BrushyCreekGatheringStation\_InitialC141(081015).pdf

Heather,

Per our discussion, please see attached OCD form C-141 for a spill occurring at the RKI operated Brushy Creek Gathering Station in Eddy County, NM (API # 30-015-24451).

Please let me know if you have any questions

Regards,

Zack Laird | Sr. EHS Manager

#### **RKI Exploration & Production, LLC**

210 Park Avenue, Suite 900 | Oklahoma City, OK 73102 405.987.2213 (o) | 405.742.2696 (m) | ZLaird@rkixp.com

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## APPENDIX B NMOSE WELLS REPORT



## New Mexico Office of the State Engineer Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.) (R=POD has been replaced, O=orphaned, C=the file is

closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

	POD												
	Sub-		Q	Q C	)						Depth	Depth	Water
POD Number	Code basin	County	64	16 4	Sec	Tws	Rng	Х	Υ	Distance	Well	Water	Column
C 02038	С	ED	3	2 4	1 26	26S	29E	599204	3541992* 🌍	642	200		
C 01354 X-3	С	ED	2	1 3	3 23	26S	29E	598323	3543837 🌍	2649	170		
C 03605 POD1	CUB	ED	4	2 3	3 27	26S	29E	596990	3541983	2724	45	0	45

Average Depth to Water: 0 feet

Minimum Depth: **0 feet** 

Maximum Depth: 0 feet

**Record Count: 3** 

**UTMNAD83 Radius Search (in meters):** 

**Easting (X):** 599681.3 **Northing (Y):** 3541562.19 **Radius:** 5000

# APPENDIX C REPORTS GEOPHYSICAL SURVEY RESULTS AND INTERPRETATION FOR BRUSHY BOOSTER STATION



March 3, 2017

WPX Energy 5315 Buena Vista Drive Carlsbad, New Mexico 88220

Attention: Karolina Blaney

Re: Geophysical Survey Results and Interpretation for Brushy Booster Station

Ms. Blaney,

WPX Energy (WPX) retained Vertex Resource Services Inc. (Vertex) to conduct electromagnetic (EM) and electrical resistivity tomography (ERT) surveys over a produced water release at the Brushy Booster Station (hereafter referred to as "site"). The site is located along State Line Road near Brushy Draw in New Mexico. Vertex personnel conducted the EM and ERT surveys on January 24 and 26, 2017. This letter reviews the results of the geophysical surveys at the site and discusses the possible origins of any anomalous subsurface electrical conductivity (EC) as it relates to chloride concentrations.

The origin of any geophysical anomaly is usually a combination of several factors. A discussion of factors affecting subsurface EC, such as soil saturation, salinity, soil type, etc., is included in Attachment 1. In an arid environment with alluvium cover, soil saturation and salinity will likely determine EC. A produced water spill will elevate both soil saturation and salinity above background conditions and ultimately increase subsurface EC above background as well. EM and ERT surveys measure subsurface EC and will be used to delineate the aerial and depth extent of elevated subsurface EC. Furthermore, the chloride concentrations from several soil samples were obtained to link chloride concentration to EC measured during the geophysical surveys.

#### **Background**

Based on observations made while performing the EM survey, the site is set between two small washes. Surface water flows to the south, and there is an exposed bedrock outcrop northwest of the site. The rock has large fractures that appear to have been opened up by erosion and dissolution. The soil and subsoil is alluvium which, at this site, is composed mostly of sand with small amounts of silt and clay. Salt residue is visible on-site and across State Line Road. The origin of the salt crystals further south is less understood because the area was not identified during the initial spill response and assessment (see the release area in Figure 1 of Attachment 2).

WPX mentioned that caliche (a hardened soil layer cemented together with carbonates) maybe present and is thought to act as an impervious layer that will impede vertical seepage of chlorides. While caliche was not observed outcropping on-site nor was it present in the soil samples acquired on-site, caliche was found in several soil borings 1 mi. southeast of the site in Texas (Texas Water Development Board, 2014). The ERT cross section can be interpreted to show whether the caliche layer prevents migration of produced water impacts at depth.

#### **Electromagnetic Survey**

The subsurface conductivity measured with the EM31 instrument is presented on Figure 1 (Attachment 2). In general, EC is elevated throughout the release area; one area of elevated EC (orange/red area) was identified:

Anomaly 1 – Main area of elevated EC correlates with the location of the surface within the bermed area.
 Elevated EC is contained onsite north of State Line Road. Less elevated EC is observed to extend south of
 State Line Road following the natural drainage direction. The depth of the measured EC within the
 anomaly ranges from 4 to 10 feet below ground surface (ft. bgs)

#### **Electrical Resistivity Tomography Survey**

An ERT survey was proposed to determine the depth to which produced water has impacted the subsurface. The subsurface conductivity measured with the ERT system is presented as a cross section. Cross section A-A' is presented on Figure 2 (Attachment 2). The horizontal axis is the linear distance along the cross section line from A to A' measured in linear feet along line (ft. al). The vertical axis is relative elevation in ft. and is exaggerated by a factor of three over the horizontal axis to clearly show subsurface variations in EC.

1. Cross section A-A' – The first layer of elevated EC is discontinuous and extends from 98 to 220 ft. al (light blue, yellow to red shaded area). This layer is approximately 6 ft. bgs. There is a deeper zone of elevated EC that extends from 75 to 220 ft. al and from -10 ft. to -35 ft. in elevation. This layer correlates laterally with the EM anomaly observed (transition from red to orange shading). The deeper layer is thinner on the edges than in the middle and has a similar shape to the cross section of a creek channel. Elevated EC is not observed below 35 ft. bgs, suggesting that there is an impervious layer such as bedrock that the higher conductivity sediments are resting on top of. Three areas with extremely elevated EC, at 39, 56 and 172 ft. al, are likely due to a grounded metal object and/or subsurface utilities nearby. Metal interferes with the electrical current flow and can cause false anomalies to occur.

#### **Soil Sample Analysis**

Two testholes were advanced with a hand auger and soil samples from 6 ft. bgs were submitted to Cardinal Laboratories in Hobbs, New Mexico. The soil samples were analyzed for texture, EC and chloride concentration. The soil samples were ordered to show a correlation between the geophysical results (EC) and chloride concentration, which is diagnostic of impacts from a produced water release. The soil sample analysis is presented in Attachment 3 and laboratory results are presented Attachment 4 (TH17-01 is Brushy Booster North and TH17-02 is Brushy Booster South). The table and graphs in Attachment 3 show that there is a positive correlation between EC measured by laboratory, EC from EM and ERT surveys, and chloride concentration.

#### **Correlation between Electrical Conductivity and Chloride Concentration**

Previous soil sampling completed by WPX shows a correlation between EC and chloride concentration. The correlation is not linear in nature. Elevated chloride concentration increases the EC measured by the EM and ERT surveys from background to elevated levels over short distances. Two examples of this non-linear relationship are shown in the sharp boundaries between background and elevated EC in the ERT cross section (Figure 2) and the

quick transition from background to elevated EC in the EM survey (Figure 1) at the margins of Anomaly 1. To quantify the relationship, Attachment 3 presents a table with chloride concentration and EC for all soil samples on-site. Attachment 3 also presents two graphs detailing the non-linear relationship between chloride concentration and the EC measured in both the ERT and EM surveys. Since there were three measurements for each WPX sample location, the average and maximum chloride concentrations were compared to estimate the EC at different chloride concentrations. Both graphs show that EC at low chloride concentration is at or near background levels, and then with increasing chloride concentration, EC rises quickly to the maximum level and remains at this level with ever increasing chloride concentration.

At this site, The New Mexico Oil Conservation Division (NMOCD) has set the preferred cleanup concentration for chlorides to be 1,000 mg/kg (personal communication, Karolina Blaney, 2016), corresponding to EC values of 106 mS/m (transition from light green to yellow shading in Figure 1) for the EM Survey and 208 mS/m for the ERT survey (transition from dark blue to light blue shading in Figure 2). There is some discrepancy between the length of the elevated EC along A-A' and where the 106 mS/m contour crosses the ERT line. To adjust for this discrepancy, a zone of elevated chloride concentration has been identified that includes sample locations north of State Line Road with a chloride concentration exceeding 1,000 mg/kg (Figure 3). A contour level of 190 mS/m crosses A-A' near the extents of elevated EC from the ERT cross section.

#### Additional Interpretation of Cross Section A-A'

The ERT cross section west of 98 ft. al does not correlate well with the soil samples if we simply conclude that elevated EC equates to elevated chloride concentration. Attachment 3 clearly shows that chloride concentration decreases with depth in the soil, yet the ERT cross section shows that on the western half of the survey EC is at or near background conditions until 11 ft. bgs. This discrepancy is explained by factoring in the extremely low soil moisture content that averages 15% for all soil samples. Subsurface electrical current flow is impeded in the near surface because there are no free disassociated ions to carry the current in the dry soils. The electrical current dives deeper and flows in the more conductive (saturated) layer at 11 ft. bgs. At this site, based on this analysis, there is a zone of highly saturated sediments sitting on top of an impervious layer which is likely the bedrock observed northwest of the site. Also, the bedrock does not appear to be saturated or fractured along A-A'.

Near-surface elevated EC east of 98 ft. al along A to A' is also due to increased soil saturation. The topography slopes to the south and east, and from the aerial photograph, it appears that surface water pools and flows to the southeast portion of the site. Based on this information, the soil is more saturated east of 98 ft. al along A-A' and will therefore have a greater EC compared to drier areas to the west.

The ERT cross section suggests that the near-surface zone of elevated chloride concentration is only 6 ft. thick, but there are soil samples at 7 ft. that exceed 1,000 mg/kg. Since chloride concentration decreases with depth, the depth at which the chloride concentration is below 1,000 mg/kg is calculated to be 10 ft. (Attachment 3).

#### **Conclusions and Recommendations**

The EM and ERT surveys identified and delineated a zone of elevated chloride concentration. This zone is contained on-site inside the soil berm. Based on the results of the ERT and EM surveys, the zone encompasses an area of 20,494 ft². The volume of soil impacted by the release is estimated to be approximately 7,591 yd³ at 10 ft. thick.

Additionally, there are areas of visible salt impacts, elevated EC and chloride concentrations that exceed 1,000 mg/kg south of State Line Road around TH17-02. The origin of the off-site salt and elevated chlorides could be from surface water run-off or another unrelated produced water release. An additional ERT cross section in this area would not yield definitive results because there are two or three large metal pipelines buried in this area that would significantly interfere with electric current flow and produce spurious results. To investigate this area further, additional soil sampling is recommended.

Sincerely,

Michael Wallace, PGp

MANAGER OF GEOPHYSICS - ENVIRONMENT

Michall Wallow

#### **Attachments**

Attachment 1. Additional Information

Attachment 2. Figures

Attachment 3. Soil Sample Analysis

Attachment 4. Soil Sample Laboratory Report

#### References

Texas Water Development Board. (2014). *State of Texas Well Report for Tracking #381144*. Austin, Texas: Texas Water Development Board. http://www2.twdb.texas.gov.

#### **ATTACHMENT 1**



#### ADDITIONAL INFORMATION ON EC, EM and ERT

#### **Factors Affecting Subsurface Electrical Conductivity**

Subsurface electrical conductivity (EC) may increase due to a few factors, some natural and others man-made. Subsurface EC will naturally increase where there is increased water saturation, increased clay content, a combination of both, or saturated soils with a higher salt content. Man-made causes of increased EC usually involve the discharge of chemicals or water (salty or brackish water) that will increase saturation and/or the total dissolved solids in the subsurface. Buried metal objects also have high electrical conductivities and will produce anomalies. Some of the anomalies from metal objects are bipolar or tripolar because the magnetic fields generated from a buried metal object can be opposing (cancelling) the primary field from the instrument or enhancing it (adding).

#### **Description of Electromagnetic Instrument and Measurements**

An electromagnetic (EM) conductivity survey utilizes Faraday's law of induction to measure soil and subsoil conductivity. A magnetic field is generated at a source coil which induces eddy currents in the earth. These eddy currents will flow through the subsurface and generate their own magnetic fields by Ampere's law. These secondary magnetic fields are measured at another coil separated some distance away from the transmitter. The ratio of the secondary magnetic field received to primary magnetic field is proportional to the subsurface conductivity. Depth of investigation for an EM survey is based on the separation between coils. Typical depths of investigation are 6 to 20 ft. for the EM31 instrument. The following website provides a description of the EM31 and how subsurface electrical conductivity is measured:

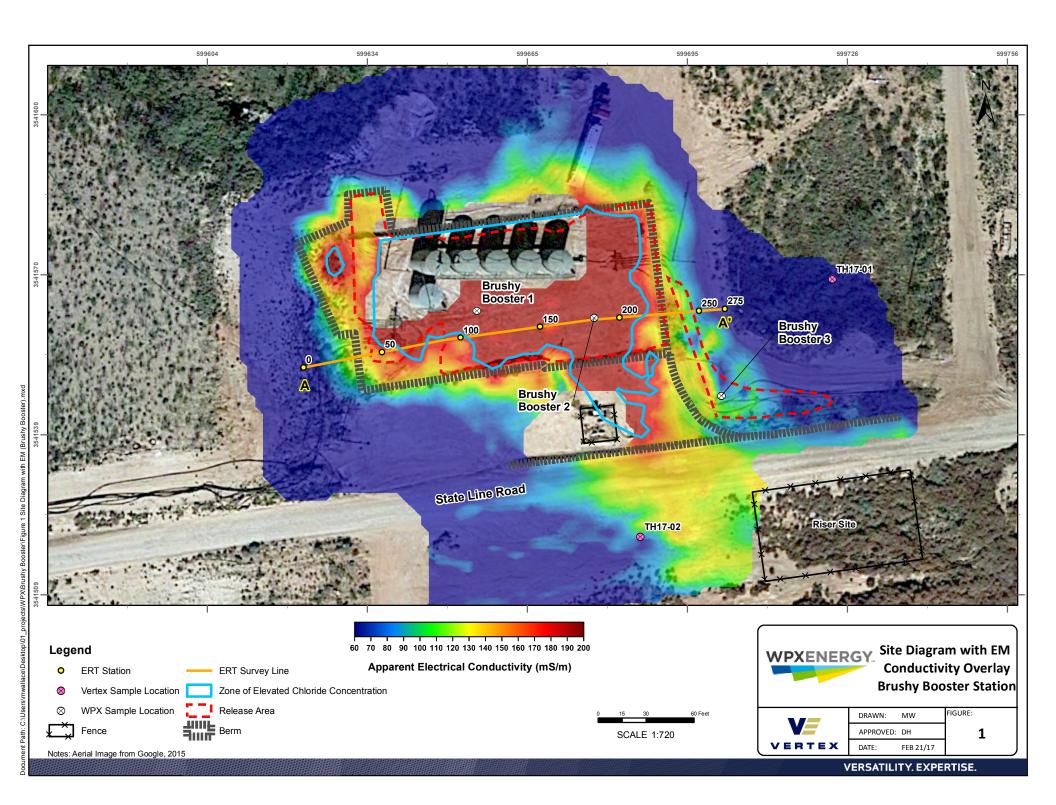
http://www.eos.ubc.ca/ubcgif/iag/foundations/method-summ\_files/em31-notes.htm

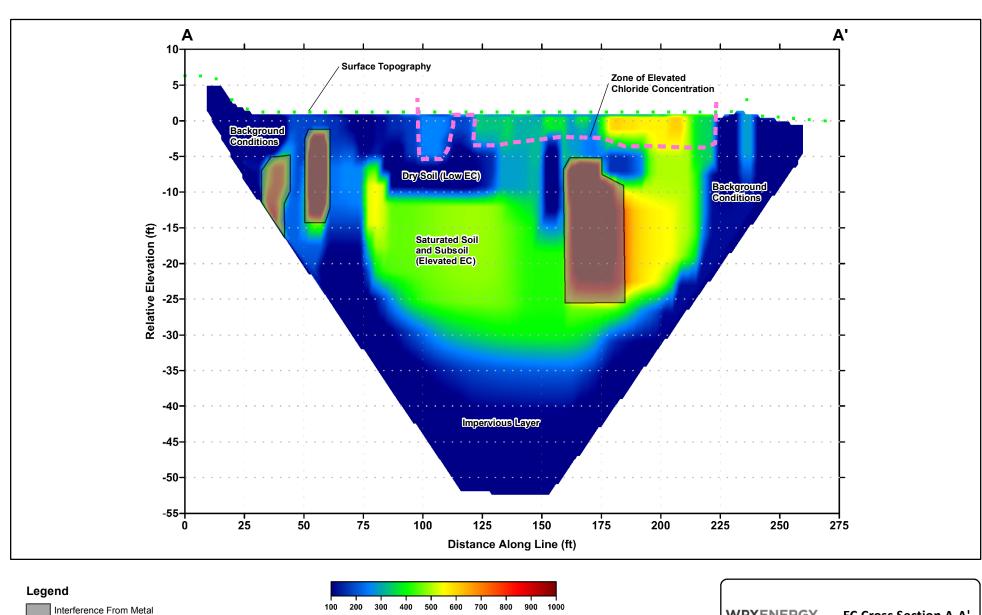
#### **Description of Electrical Resistivity Tomography**

Electrical resistivity tomography (ERT) is a subsurface imaging technique that utilizes direct current and Ohm's Law to measure EC along a 2D plane (cross section) or within a 3D volume. Direct current is injected into the subsurface through two electrodes called the current dipole. Voltage is measured somewhere else on the earth with another dipole. Ohm's Law and the electrode positions are used to calculate the apparent EC. The apparent EC refers to what the EC would be under homogeneous conditions and not accounting for surrounding variation in EC that affects electrical current flow. Typically, a survey is setup along a surveyed line with electrodes (metal stakes pounded into the ground), cables, car battery, and control/measurement unit. The control unit is preprogrammed to energize two electrodes (current dipole) and measure the voltage between another two electrodes (voltage dipole). By switching the electrodes used, the EC is measured along the line at different depths. Typically, hundreds or even thousands of measurements are made to sample EC in the subsurface at high density. After measurements are collected, a modelling methodology called inversion is used to refine the estimate of depth and EC by using the physical equations that describe electrical current flow. After inversion modelling, ERT data is typically presented as a contoured cross section or set of cross sections. Visit the website below for more detail about ERT:

https://archiv.ub.uniheidelberg.de/propylaeumdok/488/1/02 05 ullrich et al resistivity.pdf.

#### **ATTACHMENT 2**





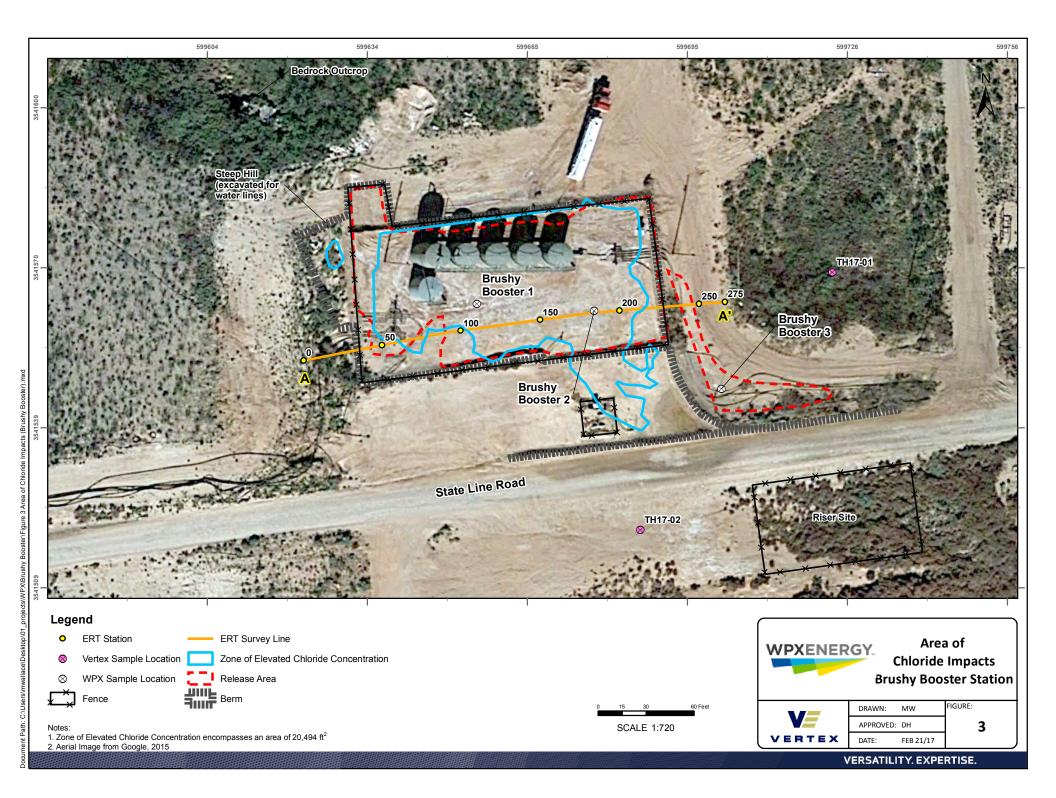
Apparent Electrical Conductivity (mS/m)

**EC Cross Section A-A' Brushy Booster Station** DRAWN: MW V

VERTEX

FIGURE: APPROVED: DH 2 FEB 21/17

Notes: Vertical Exaggeration = 3



#### **ATTACHMENT 3**

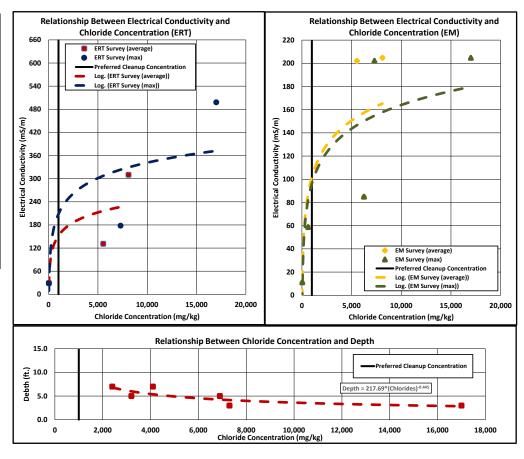
Soil Sample Analysis to Correlate Electrical Conductivity and Chloride Concentration WPX Energy Brushy Booster Station Project #: 17E-00097

	Sample Des	cription	Sal	inity	S	oil Properti	es	Geop	hysical
Location	Depth (ft)	Date	(My/Rw) Chloride	Electrical Conductivity	Soil Moisture Content	(%) Percent Sand Content	Percent Silt and Clay Content	Electrical Conductivity from  Electromagnetic Survey	Electrical Conductivity from Electrical  Resistivity Tomography Survey
NMOCD	Preferred Clea	nup Concentration	1,000	-	-	-	-	-	-
Background			. , ,						
TH17-01	6.0	January 26, 2017	32	273	-	88.8	11.2	11.573	29
WPX Samples									
Brushy Booster 1	3.0	September 4, 2016	7,300	-	12	-	-	202	178
	5.0	September 4, 2016	6,900	-	12	-	-	202	141
	7.0	November 14, 2016	2,400	-	24	-	-	202	74
Brushy Booster 2	3.0	September 4, 2016	17,000	-	11	-	-	205	498
	5.0	September 4, 2016	3,200	-	9.6	-	-	205	273
	7.0	November 14, 2016	4,100	-	20	-	-	205	159
Brushy Booster 3	September 4, 2016	630	-	19	-	•	85	-	
Vertex Samples									
TH17-02	6.0	January 26, 2017	6,240	22,400	-	41.2	58.8	80	-

NMOCD Preferred Cleanup Concentration - Personal communication, Karolina Blaney, 2016

#### Shading indicates values (excluding those in background samples) exceeding comparative guidelines

Average refers to the average chloride concentration at a location Max refers to the maximum recorded chloride concentration at a location





<sup>&</sup>quot; - " - No standard/not analyzed

#### **ATTACHMENT 4**



February 08, 2017

NATHAN CHANCLER
VERTEX RESOURCE GROUP
420 SOUTH MAIN, SUITE 202
TULSA, OK 74103

RE: SOIL SAMPLES

Enclosed are the results of analyses for samples received by the laboratory on 01/27/17 5:56.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at <a href="https://www.tceq.texas.gov/field/ga/lab">www.tceq.texas.gov/field/ga/lab</a> accredited certif.html.

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

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

Cardinal Laboratories is accredited through the State of New Mexico Environment Department for:

Method SM 9223-B Total Coliform and E. coli (Colilert MMO-MUG)
Method EPA 524.2 Regulated VOCs and Total Trihalomethanes (TTHM)

Method EPA 552.2 Total Haloacetic Acids (HAA-5)

Celey D. Keine

Accreditation applies to public drinking water matrices for State of Colorado and New Mexico.

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

Sincerely,

Celey D. Keene

Lab Director/Quality Manager

Reported:

08-Feb-17 13:54



#### **Analytical Results For:**

VERTEX RESOURCE GROUP 420 SOUTH MAIN, SUITE 202

TULSA OK, 74103

Project: SOIL SAMPLES
Project Number: NONE GIVEN

Project Manager: NATHAN CHANCLER

Fax To: NA

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
BRUSHY PIPELINE - SOUTH	H700206-01	Soil	25-Jan-17 13:00	27-Jan-17 05:56
BRUSHY PIPELINE - NORTH	H700206-02	Soil	25-Jan-17 13:30	27-Jan-17 05:56
BRUSHY BOOSTER - SOUTH	H700206-03	Soil	26-Jan-17 09:30	27-Jan-17 05:56
BRUSHY BOOSTER - NW	H700206-04	Soil	26-Jan-17 10:00	27-Jan-17 05:56

Cardinal Laboratories \*=Accredited Analyte

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Celey D. Keine



VERTEX RESOURCE GROUP 420 SOUTH MAIN, SUITE 202 TULSA OK, 74103 Project: SOIL SAMPLES
Project Number: NONE GIVEN
Project Manager: NATHAN CHANCLER

Reported: 08-Feb-17 13:54

Fax To: NA

#### **BRUSHY PIPELINE - SOUTH**

#### H700206-01 (Soil)

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes			
			Cardin	al Laborat	ories								
Inorganic Compounds	Inorganic Compounds												
Chloride	<16.0		16.0	mg/kg	4	7013110	HM	01-Feb-17	4500-Cl-B				
Conductivity*	2300		1.00	uS/cm	1	7013102	AC	31-Jan-17	120.1				
			Green Anal	lytical Lab	oratories								
Texture Classification 6Hr													
Textural Class	L			%	1	B702044	BDV	07-Feb-17	Hydrometer, Modified				
									Bouyoucos				
Sand, Percent	43.8			%	1	B702044	BDV	07-Feb-17	Hydrometer,				
									Modified Bouyoucos				
Clay, Percent	12.5			%	1	B702044	BDV	07-Feb-17	Hydrometer,				
									Modified				
Silt, Percent	43.8			%	1	B702044	BDV	07-Feb-17	Bouyoucos Hydrometer,				
~, <del></del>									Modified				
									Bouyoucos				

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Celey D. Keine



VERTEX RESOURCE GROUP 420 SOUTH MAIN, SUITE 202 TULSA OK, 74103 Project: SOIL SAMPLES
Project Number: NONE GIVEN
Project Manager: NATHAN CHANCLER

Reported: 08-Feb-17 13:54

Fax To: NA

#### **BRUSHY PIPELINE - NORTH**

H700206-02 (Soil)

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
			Cardina	al Laborat	ories					
Inorganic Compounds										
Chloride	<16.0		16.0	mg/kg	4	7013110	HM	01-Feb-17	4500-Cl-B	
Conductivity*	2370		1.00	uS/cm	1	7013102	AC	31-Jan-17	120.1	
			Green Anal	ytical Lab	oratories					
Texture Classification 6Hr										
Textural Class	L			%	1	B702044	BDV	07-Feb-17	Hydrometer, Modified Bouyoucos	
Sand, Percent	48.8			%	1	B702044	BDV	07-Feb-17	Hydrometer, Modified Bouyoucos	
Clay, Percent	8.80			%	1	B702044	BDV	07-Feb-17	Hydrometer, Modified Bouyoucos	
Silt, Percent	42.5			%	1	B702044	BDV	07-Feb-17	Hydrometer, Modified Bouyoucos	

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Celeg D. Keine



VERTEX RESOURCE GROUP 420 SOUTH MAIN, SUITE 202 TULSA OK, 74103 Project: SOIL SAMPLES
Project Number: NONE GIVEN
Project Manager: NATHAN CHANCLER

Reported: 08-Feb-17 13:54

Fax To: NA

#### **BRUSHY BOOSTER - SOUTH**

#### H700206-03 (Soil)

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
			Cardin	al Laborat	ories					
Inorganic Compounds										
Chloride	6240		16.0	mg/kg	4	7013110	HM	01-Feb-17	4500-Cl-B	
Conductivity*	22400		1.00	uS/cm	1	7013102	AC	31-Jan-17	120.1	
			Green Anal	lytical Lab	oratories					
Texture Classification 6Hr										
Textural Class	L			%	1	B702044	BDV	07-Feb-17	Hydrometer, Modified Bouyoucos	
Sand, Percent	41.3			%	1	B702044	BDV	07-Feb-17	Hydrometer, Modified Bouyoucos	
Clay, Percent	18.8			%	1	B702044	BDV	07-Feb-17	Hydrometer, Modified Bouyoucos	
Silt, Percent	40.0			%	1	B702044	BDV	07-Feb-17	Hydrometer, Modified Bouyoucos	

Cardinal Laboratories \*=Accredited Analyte

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VERTEX RESOURCE GROUP 420 SOUTH MAIN, SUITE 202 TULSA OK, 74103 Project: SOIL SAMPLES
Project Number: NONE GIVEN
Project Manager: NATHAN CHANCLER

Reported: 08-Feb-17 13:54

Fax To: NA

#### BRUSHY BOOSTER - NW

H700206-04 (Soil)

Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
		Cardina	al Laborat	ories					
32.0		16.0	mg/kg	4	7013110	HM	01-Feb-17	4500-Cl-B	
273		1.00	uS/cm	1	7013102	AC	31-Jan-17	120.1	
		Green Anal	ytical Lab	oratories					
LS			%	1	B702044	BDV	07-Feb-17	Hydrometer,	
88.8			%	1	B702044	BDV	07-Feb-17	Hydrometer,	
								Modified	
10.0			0/	1	D702044	DDV	07 Eak 17		
10.0			70	1	D/02044	Вυν	07-160-17	Modified	
								Bouyoucos	
1.30			%	1	B702044	BDV	07-Feb-17	Hydrometer,	
	32.0 273 LS 88.8 10.0	32.0 273 LS 88.8 10.0	Cardin:  32.0 16.0 273 1.00  Green Anal  LS  88.8	Cardinal Laborat   Cardinal Laborat	Cardinal Laboratories     32.0	Cardinal Laboratories	Cardinal Laboratories     32.0	Cardinal Laboratories   32.0	Cardinal Laboratories

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VERTEX RESOURCE GROUP 420 SOUTH MAIN, SUITE 202 TULSA OK, 74103 Project: SOIL SAMPLES
Project Number: NONE GIVEN
Project Manager: NATHAN CHANCLER

Reported: 08-Feb-17 13:54

Fax To: NA

#### **Inorganic Compounds - Quality Control**

#### **Cardinal Laboratories**

		Reporting		Spike	Source		%REC		RPD	
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch 7013102 - General Prep - Wet Chem										
LCS (7013102-BS1)				Prepared &	Analyzed:	31-Jan-17				
Conductivity	488		uS/cm	500		97.6	80-120			
<b>Duplicate (7013102-DUP1)</b>	Sour	rce: H700206-	01	Prepared &	Analyzed:	31-Jan-17				
Conductivity	2270	1.00	uS/cm		2300			0.963	20	
<b>Batch 7013110 - 1:4 DI Water</b>										
Blank (7013110-BLK1)				Prepared: 3	31-Jan-17 A	nalyzed: 0	l-Feb-17			
Chloride	ND	16.0	mg/kg							
LCS (7013110-BS1)				Prepared: 31-Jan-17 Analyzed: 01-Feb-17						
Chloride	432	16.0	mg/kg	400		108	80-120			
LCS Dup (7013110-BSD1)				Prepared: 3	31-Jan-17 A	nalyzed: 0	l-Feb-17			
Chloride	432	16.0	mg/kg	400		108	80-120	0.00	20	

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VERTEX RESOURCE GROUP 420 SOUTH MAIN, SUITE 202 TULSA OK, 74103 Project: SOIL SAMPLES
Project Number: NONE GIVEN
Project Manager: NATHAN CHANCLER

Reported: 08-Feb-17 13:54

Fax To: NA

#### **Texture Classification 6Hr - Quality Control**

#### **Green Analytical Laboratories**

		Reporting		Spike	Source		%REC		RPD	
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes

#### Batch B702044 - General Prep - Wet Chem

<b>Duplicate (B702044-DUP1)</b>	Source: H700206-0	2	Prepared & Analyzed: 07-Feb-17		
Sand, Percent	48.8	%	48.8	0.00	20
Clay, Percent	8.80	%	8.80	0.00	20
Silt, Percent	42.5	%	42.5	0.00	20

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#### **Notes and Definitions**

Texta LS

Text I

ND Analyte NOT DETECTED at or above the reporting limit

RPD Relative Percent Difference

\*\* Samples not received at proper temperature of 6°C or below.

\*\*\* Insufficient time to reach temperature.

- Chloride by SM4500Cl-B does not require samples be received at or below 6°C

Samples reported on an as received basis (wet) unless otherwise noted on report

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# CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name:	Vortex Resource Services	7			B	ILL TO					ANA	ANALYSIS	REQUEST				
Project Manager:	Nathon Charl			P.O. #:	#												
Address:				Com	Company:								 				
City:	State:	Zip:		Attn:													
Phone #:	Fax #:			Address:	ess:												_
Project #:	Project Owner:			city:													
Project Name:				State:	155	Zip:											
Project Location:				Phone #:	ne #:												_
Sampler Name:				Fax #:	#				_								
FOR LAB USE ONLY		IP.	MATRIX	9	PRESERV.	/ SAMPLING	ING	. 1		_							
Lab I.D. H700166	Sample I.D.	(G)RAB OR (C)OMF	# CONTAINERS GROUNDWATER WASTEWATER SOIL OIL SLUDGE	OTHER : ACID/BASE:	ICE / COOL OTHER:		TIME	EC	Chlos;	Texture							
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2	D	5	7			37/1	1330	1.		×							Charles and the Control of the Contr
r	Brushy Boosti-S	6 1	1			1/26	0930	×	-	×					_	_	
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									$\vdash$	H	П						
PLEASE NOTE: Liability ar analyses. All claims includir service. In no event shall Ca	PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall be faring the liable for incidental or consequental damages, including without limitation, business interruptional loss of use, or loss of profits incurred by client, its subsidiaries, service. In no event shall be arrived by Cardinal be liable for incidental or consequental damages, including without limitation, business interruptional loss, or loss of profits incurred by client, its subsidiaries.	any claim a deemed w g without li	arising whether based in contr waived unless made in writing fimitation, business interruption	and receive	shall be limit id by Cardin se, or loss o	ed to the amount pal within 30 days a f profits incurred b	haid by the client for the fter completion of the y client, its subsidiarie	e applicable s,								,	
Relinquished By	Date:	Rec	Received By:	00	00m	>	Phone Result: Fax Result: REMARKS:	i i	□ Yes	□ No	Add'l	Add'l Phone #: Add'l Fax #:					
Relinquished By:	/: Date:	Res	Received By:	}			,										
Delivered Bv: (Circle One)	(Circle One)	minan	Sample Condition	dition	CHE	CHECKED BY:											

Sampler - UPS - Bus - Other:

# APPENDIX D GROUNDWATER IMPACT RISK MODEL

