<u>District I</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 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.

Form C-144 Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.

For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

1220 S. St. Francis	Dr., Santa Fe, NM 87505	Santa Fe, NM 87505	to the appropriate NMOCD District Office.
13928		Pit, Below-Grade Tank, or	
39-29233	Proposed Alte	rnative Method Permit or Closure	Plan Application
39-29233	⊠ Closur □ Modif	grade tank registration of a pit or proposed alternative method e of a pit, below-grade tank, or proposed alternatication to an existing permit/or registration e plan only submitted for an existing permitted	
	or proposed alternative meth		or non-permitted pri, ovicin grade tallin,
		ne application (Form C-144) per individual pit, belo	w-grade tank or alternative request
nvironment. Nor o		at relieve the operator of liability should operations result of its responsibility to comply with any other applicable	t in pollution of surface water, ground water or the governmental authority's rules, regulations or ordinances.
I.	nocoPhillips Company OGRI	D#: 217817	
	BOX 4289, Farmington, NM 8		
	name: SAN JUAN 30-5 UNIT		
-52		OCD Permit Number:	
		26 Township 30N Range	
100 000		20 10wiship 3014 Range	
		☐ Tribal Trust or Indian Allotment	<u>w</u> Nab. [1927 [2] 1963
	. M redetat M State M Titvate	I Tribai Trust of indian Anotheric	
2.	ection F, G or J of 19.15.17.11 N	IMAC	
	Drilling Workover		
		P&A Multi-Well Fluid Management	Low Chloride Drilling Fluid ☐ yes ☐ no
1500-10 W. W. COO-100-10 D. COO-100-10	ends of the second of the seco	mil	
String-Rein	£.5		·
10-06 280		· Volume:bbl D	imencions: I v W v D
Linei Scains.		voiunicbu b	illicitsions. LX w_XD
3.			
Below-grad	le tank: Subsection I of 19.15.	17.11 NMAC	
Volume:	<u>120</u> bbl Tyr	e of fluid: Produced Water	
	ion material: Metal		
☐ Secondary	containment with leak detection	☐ Visible sidewalls, liner, 6-inch lift and automatic	c overflow shut-off
		ewalls only Other	
Liner type: Thi	icknessn	nil 🗌 HDPE 🗌 PVC 🔯 Other <u>UNSPECIF</u>	PIED
4.			
Alternative Submittal of an		Exceptions must be submitted to the Santa Fe Environ	nmental Bureau office for consideration of approval.
5,			
Fencing: Subs	ection D of 19.15.17.11 NMAC	(Applies to permanent pits, temporary pits, and below	v-grade tanks)
		barbed wire at top (Required if located within 1000 fe	eet of a permanent residence, school, hospital,
institution or ch		evenly spaced between one and four feet	
rour root ne	, roar straines or barbon with	or and opaced octive on one and rour rect	

Alternate. Please specify

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)					
7. 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 19.15.16.8 NMAC					
Nariances 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: Variance(s): Requests must be submitted to the appropriate division district for consideration of approval. Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.					
9. 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 acception material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	ptable source				
General siting					
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA				
Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit. NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells					
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. (Does not apply to below grade tanks) - Written confirmation or verification from the municipality; Written approval obtained from the municipality					
Within the area overlying a subsurface mine. (Does not apply to below grade tanks) - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No				
 Within an unstable area. (Does not apply to below grade tanks) Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map 					
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map					
Below Grade Tanks					
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ⊠ No				
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site					
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)					
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.) - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No				
Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.	☐ Yes ☐ No				
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image					
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No				

Within 100 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No						
Temporary Pit Non-low chloride drilling fluid							
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No						
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No						
Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No						
Within 300 feet of a wetland US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No						
Permanent Pit or Multi-Well Fluid Management Pit							
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). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No						
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No						
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site							
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site							
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 Natructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the docattached. 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. and 19.15.17.13 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number:	NMAC 15.17.9 NMAC						
Previously Approved Design (attach copy of design) API Number: or Permit Number:							
Multi-Well Fluid Management Pit 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 docattached. 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 A List of wells with approved application for permit to drill associated with the pit. Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19 and 19.15.17.13 NMAC Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number:	.15.17.9 NMAC						

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 attached.	documents are					
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 ₂ 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						
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 Multi-well F 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	luid Management Pit					
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be 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 C 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 H of 19.15.17.13 NMAC □ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC						
15. 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 sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. In 19.15.17.10 NMAC for guidance.	rce material are Please refer to					
Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA					
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No					
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No					
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa ake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site						
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No					
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☐ No					
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No					
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ 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. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological	
Society; Topographic map Within a 100-year floodplain.	☐ Yes ☐ No
- FEMA map	☐ Yes ☐ No
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan 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 E of 19.15.17.13 NMAC Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.13 Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.13 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 19.15.17.13 NMAC Waste Material Sampling Plan - based upon the appropriate requirements 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 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 H of 19.15.17.13 NMAC	11 NMAC 15.17.11 NMAC
17. 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 believed to the best of my	ef.
Name (Print): Title:	
Signature: Date:	
e-mail address: Telephone:	
18. OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)	
OCD Representative Signature: Approval Date: 6/27/2	016
Title: Compliance Officer OCD Permit Number:	
19. Closure Report (required within 60 days of closure completion): 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 is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not section of the form until an approved closure plan has been obtained and the closure activities have been completed. □ Closure Completion Date: 6/19/15	
20. Closure Method: Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loc ☐ If different from approved plan, please explain.	op systems only)

22.
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): Crystal Walker Title: Regulatory Coordinator
Signature: Date: 12/29/15
e-mail address: crystal.walker@cop.com Telephone: (505) 326-9837

ConocoPhillips Company San Juan Basin Below Grade Tank Closure Report

Lease Name: San Juan 30-5 Unit 247R

API No.: 30-039-29233

In accordance with Rule 19.15.17.13 NMAC the following information describes the closure of the below-grade tank referenced above. All proper documentation regarding closure activities is being included with the C-144.

General Plan:

COPC shall close a below-grade tank within 60 days of cessation of operations per Subsection G.4 of 19.15.17.13
 NMAC. This will include a) below-grade tanks that do not meet the requirements of Paragraphs (1) through (4) of
 Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five
 years, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC; b) an earlier
 date that the division requires because of imminent danger to fresh water, public health or the environment. For any
 closure, COPC will file the C144 Closure Report as required.

The below-grade tank referenced above was permitted and closed within 60 days of cessation of the below-grade tanks operation.

COPC shall remove liquids and sludge from a below-grade tank prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility. The facilities to be used will be Basin Disposal (Permit #NM-01-005), JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B) and Envirotech Land Farm (Permit #NM-01-011). The liner after being cleaned well (Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC) will be disposed of at the San Juan County Regional Landfill located on CR 3100.

All recovered liquids were disposed of at Basin Disposal (Permit #NM-01-005) and any sludge or soil required to be removed to facilitate closure was hauled to Envirotech Land Farm (Permit #NM-01-011) and JFJ Landfarm % IEI (Permit #NM-01-0010B). The liner was cleaned per Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC was disposed of at the San Juan County Regional Landfill located on CR 3100.

3. COPC will receive prior approval to remove the below-grade tank and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves.

The below-grade tank was disposed of in a division-approved manner.

4. If there is any on-site equipment associated with a below-grade tank, then COPC shall remove the equipment, unless the equipment is required for some other purpose.

All on-site equipment associated with the below-grade tank was removed.

5. COPC will test the soils beneath the below-grade tank to determine whether a release has occurred. COPC shall collect, at a minimum, a five point, composite sample; collect individual grab samples from any area that is wet, discolored or showing other evidence of a release; and analyzed for the constituents listed in Table I of 19.15.17.13 NMAC. COPC shall notify the division of its results on form C-141.

A five point composite sample was taken of the below-grade tank using sampling tools and all samples tested per Subsection B of 19.15.17.1 3(B)(1)(b). (Sample results attached). Form C-141 is attached.

Components	Tests Method	Limit (mg/kg)
Benzene	EPA SW-846 8021B or 8260B	0.2
BTEX	EPA SW-846 8021B or 8260B	50
TPH	EPA SW-846 418.1	100
Chlorides	EPA 300.0	250

6. If COPC or the division determines that a release has occurred, then COPC shall comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC, as appropriate.

A release was not determined for the above referenced well.

7. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Table I of 19.15.17.13 NMAC, then COPC shall backfill the excavation with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover; recontour and re-vegetate the site.

The below-grade tank area passed all requirements of Paragraph (4) of Subsection E of 19.15.17.13 NMAC and was backfilled with compacted, non-waste containing, earthen material.

- 8. Notice of Closure will be given prior to closure to the Aztec Division office between 72 hours and one week via email or verbally. The notification of closure will include the following:
 - i. Operator's name
 - ii. Location by Unit Letter, Section, Township, and Range. Well name and API number.

Notification is attached.

9. The surface owner shall be notified of COPC's closing of the below-grade tank 72 hours, but not more than one week, prior to closure as per the approved closure plan via certified mail, return receipt requested.

The closure process notification to the landowner was sent via email.

10. Re-contouring of location will match fit, shape, line, form and texture of the surrounding. Re-shaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be place in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface, fitting the natural landscape.

The below-grade tank area was re-contoured to match fit, shape, line, form and texture of the surrounding area. Re-shaping including drainage control, to prevent ponding and erosion. Natural drainages were unimpeded and water bars and/or silt traps were placed in areas where needed to prevent erosion on a large scale. Final recontour has a uniform appearance with smooth surface, fitting the natural landscape.

11. COPC shall seed the disturbed areas the first favorable growing season following closure of a below-grade tank. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM stipulated seed mixes will used on federally regulated lands and division-approved seed mixtures (administratively approved if required) will be utilized on all State or private lands. A uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre- disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds. If alternate seed mix is required by the state, private owner or tribe, it will be implemented with administrative approval if needed. COPC will repeat seeding or planting will be continued until successful vegetative growth occurs.

Provision 13 was accomplished through complying with BLM seeding requirements as allowed by the BLM/OCD MOU.

12. A minimum of four feet of cover shall be achieved and the cover shall include one foot of suitable material, with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.

The below-grade tank area was backfilled and more than four feet of cover was achieved and the cover included one foot of suitable material to establish vegetation at the site.

- 13. All closure activities will include proper documentation and be available for review upon request and will be submitted to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on C-144 and incorporate the following:
 - Soil Backfilling and Cover Installation (See Report)
 - Re-vegetation application rates and seeding techniques (See Report)
 - Photo documentation of the site reclamation (Included as an attachment)
 - Confirmation Sampling Results (Included as an attachment)
 - Proof of closure notice (Included as an attachment)

Walker, Crystal

From: Clugston, Patricia L

Sent: Friday, June 12, 2015 10:59 AM

To: Cory Smith; 'Kelly, Jonathan, EMNRD'; 'jjmiller@fs.fed.us'

Cc: GRP:SJBU Regulatory; Fincher, Shawn S

Subject: FW: San Juan 30-5 #247R - AOU - 30-039-29233

Subject: SJ 30-5 Unit 247R - BGT removal

Anticipated Start Date: 6/17/15

The subject well has a below-grade tank that will begin the closure process between 72 hours and one week from this notification. Please contact me at any time if you have any questions or concerns.

Well Name: San Juan 30-5 Unit 247R

API#: 30-039-29233

Location: Sec. 26, T30N, R5W

Footages: UL A (NENE), 925' FNL & 710' FNL,

Operator: Conocophillips. Surface Owner: Carson National Forest

Patsy Clugston
Staff Regulatory Technician
Patsy.L.Clugston@conocophillips.com
505-326-9518

From: Fincher, Shawn S

Sent: Friday, June 12, 2015 9:32 AM

To: GRP:SJBU Regulatory **Cc:** Becker, Joey W

Subject: San Juan 30-5 #247R

This P&A facility strip with a BGT was scheduled for Monday, June 15th but will be rescheduled to Wednesday, June 17th because of the weather.

Thank You,

Shawn Fincher
Projects Coordinator
ConocoPhillips Lower 48
San Juan Business Unit
Shawn.s.fincher@conocophillips.com
505-324-5159 Office

505-320-2505 Cell

Visit the new Lower 48 website: www.conocophillipsuslower48.com

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

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 to accordance with 19.15.29 NMAC.

			Rele	ease Notific	catio	n and Co	orrective A	Action				
						OPERA'	ГOR		☐ Initi	al Report	\boxtimes	Final Rep
Name of Co							ystal Walker					
Address 340						Telephone No.(505) 326-9837						
Facility Nar	ne: San Jua	an 30-5 Un	it 247R			Facility Typ	e: Gas Well					
Surface Ow	ner USFS			Mineral C	Owner 1	Federal			API No	.30-039-29	9233	
				LOCA	ATIO	N OF RE	LEASE					
Unit Letter A	Section 26	Township 30N	Range 5W	Feet from the 710		/South Line North	Feet from the 925	properties 200	est Line ast	County Rio Arril	oa	
		,	1.1	Latitude 36	6.78905	Longitud	e <u>-107.32060</u>	1				
				NAT	TURE	OF REL	EASE					
Type of Rele	ase					Volume of		T	Volume I	Recovered		
Source of Re	lease					Date and Hour of Occurrence Date and Hour of Discovery						
Was Immedia	ate Notice Gi	iven?				If YES, To Whom?						
Trus IIIIII da			Yes 🗆	No 🛛 Not Re	equired							
By Whom?	By Whom?						Iour					
Was a Watercourse Reached?						If YES, Vo	olume Impacting	the Water	rcourse.			
	☐ Yes ⊠ No											
	If a Watercourse was Impacted, Describe Fully.*											
N/A												
				_								
Describe Cau												
No release w	as encounte	rea auring t	ne BG1	Josure.								
Describe Aug	a A CCastad sa	d Claamin A	ation Tol	****								
Describe Are	a Affected at	na Cleanup F	Action Tak	en. "								
1,722												
I hereby certi	fy that the in	formation gi	ven above	is true and comp	lete to t	he best of my	knowledge and u	understan	d that pur	suant to NM	OCD r	ules and
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Printed Name	e: Crystal W	alker					4111					
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July 24, 2015

Ms. Lisa Hunter ConocoPhillips San Juan Business Unit 5525 Highway 64 Farmington, New Mexico 87401

Re: San Juan 30-5 Unit 247R

Below Grade Tank Closure Sampling Report

Dear Ms. Hunter:

This report summarizes the below grade tank (BGT) closure sampling activities conducted by Rule Engineering, LLC (Rule) at the ConocoPhillips San Juan 30-5 Unit 247R, located in Unit Letter A, Section 26, Township 30N, Range 5W in Rio Arriba County, New Mexico. Activities included collection and analysis of a 5-point composite soil confirmation sample from beneath the BGT on June 19, 2015. A topographic map of the location is included as Figure 1 and an aerial site map is included as Figure 2.

BGT Summary

Site Name – San Juan 30-5 Unit 247R
Location – Unit Letter A, Section 26, Township 30N, Range 5W
API Number – 30-039-29233
Wellhead Latitude/Longitude – N36.78894 and W107.32083
BGT Latitude/Longitude – N36.78905 and W107.32060
Land Jurisdiction – Forest Service
Size of BGT – 120 barrels
Site Ranking – 0 per New Mexico Oil Conservation Division Guidelines for Remediation of Leaks, Spills, and Releases (August 1993)
Date of BGT Closure Soil Sampling – June 19, 2015

BGT Closure Standards

As outlined in 19.15.17.13 New Mexico Administrative Code (NMAC), BGT closure standards for the San Juan 30-5 Unit 247R are as follows: 0.2 mg/kg benzene, 50 mg/kg total benzene, toluene, ethylbenzene, and total xylenes (BTEX), and 100 mg/kg total petroleum hydrocarbons (TPH).

Field Activities

On June 19, 2015, following removal of the BGT tank and liner, Rule personnel conducted a visual inspection for surface/subsurface indications of a release. No evidence of a release was observed. Rule personnel then collected five soil samples (S-1 through S-5) from 0.5 feet beneath the BGT liner. Figure 2 provides

Ms. Lisa Hunter San Juan 30-5 Unit 247R July 24, 2015 Page 2 of 3

the location of the soil samples collected from below the BGT. The field work summary sheet is attached.

Soil Sampling

The five soil samples (S-1 through S-5) collected from below the BGT liner were combined to create soil confirmation sample SC-1. A portion of SC-1 was field screened for volatile organic compounds (VOCs) and chlorides, and field analyzed for total petroleum hydrocarbons (TPH) per U.S. Environmental Protection Agency (USEPA) Method 418.1.

The portion of SC-1 collected for laboratory analysis was placed into laboratory supplied glassware, labeled, and maintained on ice until delivery to Hall Environmental Analysis Laboratory in Albuquerque, New Mexico. The sample was analyzed for BTEX per USEPA Method 8021B, TPH per USEPA Method 418.1, and chlorides per USEPA Method 300.0.

Field sampling results for soil confirmation sample SC-1 reported VOCs at 5.0 ppm and TPH concentrations at 44.4 mg/kg. Field chloride concentrations were reported at 60 mg/kg. Laboratory analytical results for sample SC-1 reported benzene and total BTEX concentrations as less than 0.049 mg/kg and 0.245 mg/kg, respectively. Laboratory analytical results for SC-1 reported concentrations of less than 20.0 mg/kg TPH and less than 1.5 mg/kg chloride. Field and laboratory results for SC-1 are summarized in Table 1, and the analytical laboratory report is attached.

Conclusions

On June 19, 2015, BGT closure sampling activities were conducted at the ConocoPhillips San Juan 30-5 Unit 247R. Field and laboratory results for sample SC-1 were reported below the BGT closure standards for benzene, total BTEX, TPH, and chlorides as outlined in 19.15.17.13.NMAC. Based on field sampling and laboratory analytical results, no release occurred from the BGT and no further work is recommended.

Rule Engineering appreciates the opportunity to provide services to ConocoPhillips. If you have any questions, please contact me at (505) 325-1055.

Sincerely,

Rule Engineering, LLC

Debrack Water

Deborah Watson, PG

Ms. Lisa Hunter San Juan 30-5 Unit 247R July 24, 2015 Page 3 of 3

Attachments:

Table 1. Soil Sampling Results-VOCs, Benzene, Total BTEX, and TPH Figure 1. Topographic Map Figure 2. Aerial Site Map Field Work Summary Sheet Analytical Laboratory Report



Table 1. BGT Soil Sampling Results San Juan 30-5 Unit 247R Rio Arriba County, New Mexico ConocoPhillips

				Field S	Field Sampling Results	sults	La	Laboratory Analytical Results	ytical Resu	ts
		Sample	Sample Depth	VOCs (PID)	TPH	Chloride	Benzene	Total BTEX	TPH	Chloride
Sample ID	Date	Type	(ft below BGT)	(mdd)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
		BGT (BGT Closure Standards*		100	250	0.2	90	100	250
SC-1	Jun 19, 15	composite	0.5	5.0	44.4	09	<0.049	<0.245	<20.0	<1.5

Notes: PID - photo-ionization detector

ppm - parts per million

mg/kg - milligrams/kilograms

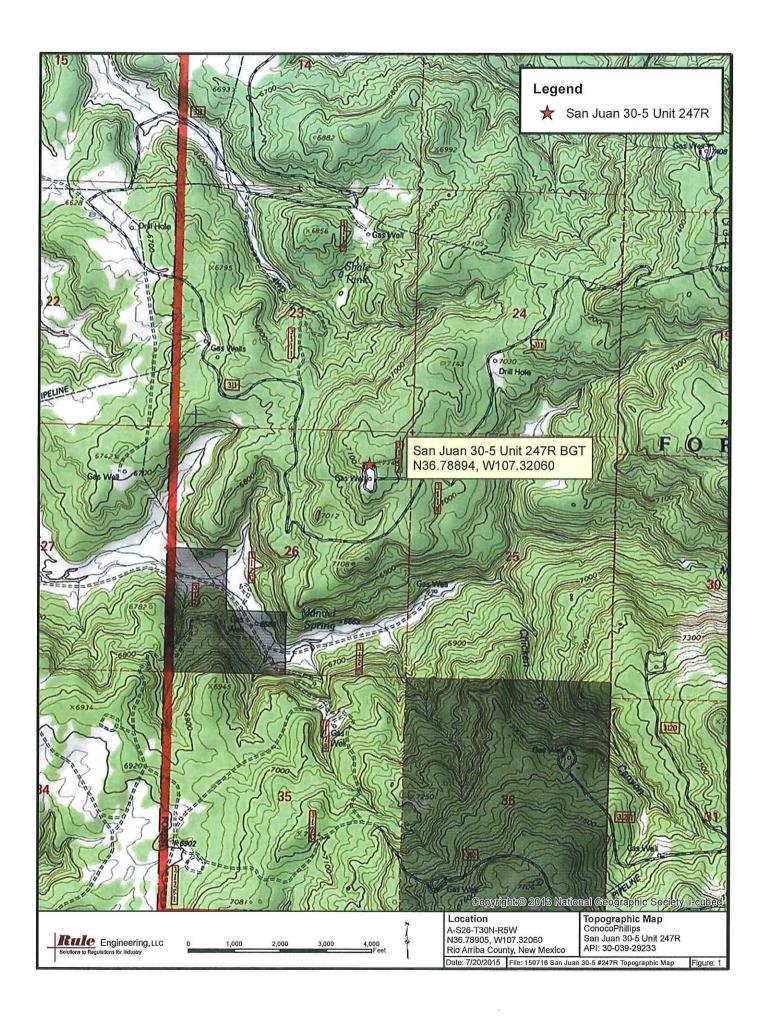
VOCs - volatile organic compounds

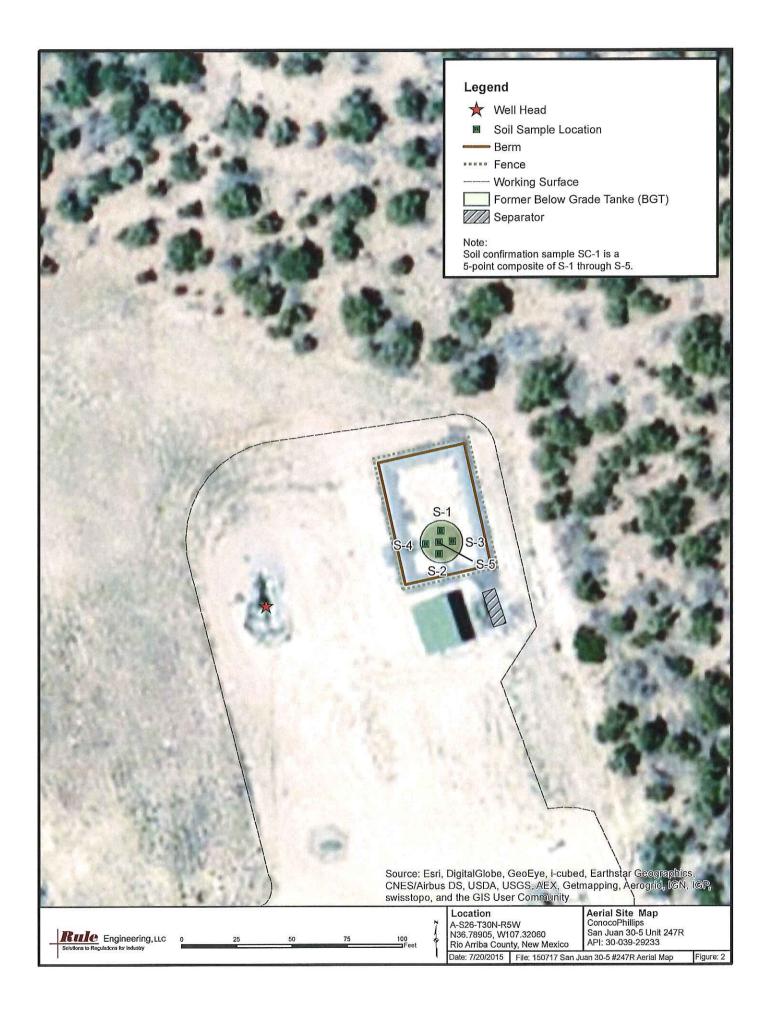
TPH-total petroleum hydrocarbons per USEPA Method 418.1

BTEX - benzene, toluene, ethylbenzene, and total xylenes

*19.15.17.13 NMAC







Rule Engineering Field Work Summary Sheet

Company:	ConocoPhillips	
Location:	San Juan 30-5 Unit 247R	
API:	30-039-29233	
Legals:	A-S26-T30N-R5W	
County:	Rio Arriba	
Land Jurisd	iction: Forest Service	

Date:	19-Jun-15
Staff:	Debbie Watson

Wellhead GPS: 36.78894, -107.32083

BGT GPS: 36.78905, -107.32060

Siting Information based on BGT Location:

Site Rank Groundwater: Cathodic Report for San Juan 30-5 #32M reported groundwater at 160 ft bgs

Surface Water: Unnamed wash located 2,740 ft SW of BGT drains to wash in Manuel Canyon

Wellhead Protection: No wells

Objective: Closure sampling for BGT

120 bbls Tank Size: (removed while onsite)

Liner: Yes, removed while onsite

Observations: No staining or indication of a release below liner.

Liner and cribbing in place. Removed for sampling. Cory Smith, NMOCD, on site during sampling activities. Notes:

Field Sampling Information

	Type of	Collection	Collection	VOCs ¹	VOCs	TPH ²	TPH	Chloride ³	Chloride
Name	Sample	Time	Location	(ppm)	time	mg/kg	Time	mg/kg	Time
SC-1	composite	1100	see below	5.0	11:20	44.4	11:25	60	11:35

SC-1 is a 5-point composite of S-1 through S-5, collected 0.5 ft below tank liner.

Sample SC-1 was laboratory analyzed for TPH (418.1), BTEX (8021) and chlorides (300.0).



Field Sampling Notes:

³Field screening for chlorides was conducted using the Hach chloride low range test kit. Chloride concentrations are determined by drop count titration method using silver nitrate titrant.



¹ Field screening for volatile organic compounds (VOC) vapors was conducted with a photo-ionization detector (PID). Before beginning field screening, the PID was calibrated with 100 parts per million (ppm) isobutylene gas.

² Field analysis for TPH was conducted using a total hydrocarbon analyzer. Prior to field analysis, the machine was calibrated following the manufacturer's procedure which includes calculation of a calibration curve using known concentration standards.



Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87109 TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

July 06, 2015

Deborah Watson Rule Engineering LLC 501 Airport Dr., Ste 205 Farmington, NM 87401 TEL: (505) 860-2712

FAX

RE: San Juan 30-5 # 247R OrderNo.: 1506969

Dear Deborah Watson:

Hall Environmental Analysis Laboratory received 1 sample(s) on 6/20/2015 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

Andy Freeman

Laboratory Manager

andyl

4901 Hawkins NE

Albuquerque, NM 87109

Analytical Report

Lab Order 1506969

Date Reported: 7/6/2015

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Rule Engineering LLC

Project: San Juan 30-5 # 247R

Lab ID: 1506969-001

Client Sample ID: SC-1

Collection Date: 6/19/2015 11:00:00 AM

Received Date: 6/20/2015 7:00:00 AM

Analyses	Result	RL Qu	al Units	DF	Date Analyzed	Batch
EPA METHOD 418.1: TPH					Analys	t: TOM
Petroleum Hydrocarbons, TR	ND	20	mg/Kg	1	6/26/2015	19942
EPA METHOD 300.0: ANIONS					Analys	t: LGT
Chloride	ND	1.5	mg/Kg	1	6/27/2015 7:05:27 AM	19959
EPA METHOD 8021B: VOLATILES					Analys	t: NSB
Benzene	ND	0.049	mg/Kg	1	6/23/2015 11:41:59 PM	M 19852
Toluene	ND	0.049	mg/Kg	1	6/23/2015 11:41:59 PM	M 19852
Ethylbenzene	ND	0.049	mg/Kg	1	6/23/2015 11:41:59 PM	M 19852
Xylenes, Total	ND	0.098	mg/Kg	1	6/23/2015 11:41:59 PM	M 19852
Surr: 4-Bromofluorobenzene	87.4	80-120	%REC	1	6/23/2015 11:41:59 PM	M 19852

Matrix: SOIL

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit

Page 1 of 3

- P Sample pH Not In Range
- RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#:

1506969

06-Jul-15

Client:

Rule Engineering LLC

Project:

San Juan 30-5 # 247R

Sample ID MB-19942

SampType: MBLK

TestCode: EPA Method 418.1: TPH

Client ID:

PBS

Batch ID: 19942

RunNo: 27121

Prep Date:

6/25/2015

SeqNo: 811084

Analysis Date: 6/26/2015 PQL

20

Units: mg/Kg

Analyte

SPK value SPK Ref Val %REC LowLimit HighLimit

Qual

Petroleum Hydrocarbons, TR

ND

Result

SampType: LCS

TestCode: EPA Method 418.1: TPH

Sample ID LCS-19942

Client ID: Prep Date: 6/25/2015

LCSS

Batch ID: 19942 Analysis Date: 6/26/2015 RunNo: 27121 SeqNo: 811085

Units: mg/Kg

126

%RPD

Analyte

SPK value SPK Ref Val PQL

100.0

%REC LowLimit 91.9

HighLimit

%RPD **RPDLimit**

RPDLimit

Qual

Petroleum Hydrocarbons, TR

Sample ID LCSD-19942

92

20 SampType: LCSD

20

TestCode: EPA Method 418.1: TPH

RunNo: 27121

86.7

Client ID: Prep Date:

LCSS02

6/25/2015

Batch ID: 19942 Analysis Date: 6/26/2015

SeqNo: 811086

Units: mg/Kg

Qual

Analyte Petroleum Hydrocarbons, TR

Result

92

SPK value SPK Ref Val %REC 100.0 0

91.9

86.7

LowLimit

HighLimit %RPD 126

RPDLimit

0

20

Qualifiers:

Value exceeds Maximum Contaminant Level.

Spike Recovery outside accepted recovery limits

E Value above quantitation range

J Analyte detected below quantitation limits

0 RSD is greater than RSDlimit

R RPD outside accepted recovery limits

Analyte detected in the associated Method Blank H

ND Not Detected at the Reporting Limit

P Sample pH Not In Range

RL Reporting Detection Limit

Holding times for preparation or analysis exceeded Page 2 of 3

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#:

1506969

06-Jul-15

Client: Project: Rule Engineering LLC

Result

0.86

San Juan 30-5 # 247R

Sample ID MB-19852

SampType: MBLK

TestCode: EPA Method 8021B: Volatiles

Client ID:

PBS

Batch ID: 19852

RunNo: 27021

%RPD

%RPD

RPDLimit

Prep Date:

6/22/2015

Analysis Date: 6/23/2015

SegNo: 807520

SPK value SPK Ref Val %REC LowLimit

Units: mg/Kg HighLimit

RPDLimit Qual

Qual

Analyte Benzene

Toluene Ethylbenzene Xylenes, Total

ND 0.050 ND 0.050 ND 0.050 ND 0.10

PQL

1.000

85.8

120

Surr: 4-Bromofluorobenzene Sample ID LCS-19852

Client ID: LCSS

SampType: LCS

Batch ID: 19852

RunNo: 27021

TestCode: EPA Method 8021B: Volatiles

80

Prep Date: 6/22/2015

Analysis Date: 6/23/2015

SeqNo: 807521

Units: mg/Kg

I .							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit
Benzene	1.1	0.050	1.000	0	106	76.6	128
Toluene	1.0	0.050	1.000	0	103	75	124
Ethylbenzene	1.1	0.050	1.000	0	106	79.5	126
Xylenes, Total	3.1	0.10	3.000	0	105	78.8	124
Surr: 4-Bromofluorobenzene	0.95		1.000		94.8	80	120

Qualifiers:

Value exceeds Maximum Contaminant Level.

E Value above quantitation range

J Analyte detected below quantitation limits

0 RSD is greater than RSDlimit

R RPD outside accepted recovery limits

Spike Recovery outside accepted recovery limits

Analyte detected in the associated Method Blank

Η Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

P Sample pH Not In Range

RL Reporting Detection Limit Page 3 of 3



Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquergue, NM 87109 TEL: 505-345-3975 FAX: 505-345-4107

Website: www.hallenvironmental.com

Sample Log-In Check List

RULE ENGINEERING LL Client Name: Work Order Number: 1506969 RcptNo: 1 Received by/date: Logged By: Mangin 6/20/2015 7:00:00 AM Completed By: Lindsay Mangin 6/20/2015 7:16:33 AM Reviewed By: Chain of Custody No 🗆 1. Custody seals intact on sample bottles? Yes Not Present No 🗌 2. Is Chain of Custody complete? Yes Not Present 3. How was the sample delivered? Courier Log In 4. Was an attempt made to cool the samples? No 🗌 NA 🗌 5. Were all samples received at a temperature of >0° C to 6.0°C No 🗌 NA 🗀 6. Sample(s) in proper container(s)? No 🗆 Yes 7. Sufficient sample volume for indicated test(s)? No 🗌 8. Are samples (except VOA and ONG) properly preserved? No No 🐼 9. Was preservative added to bottles? Yes NA 🗀 Yes No VOA Vials 10.VOA vials have zero headspace? No 🗌 Ш 11. Were any sample containers received broken? Yes No 🐼 # of preserved bottles checked for pH: 12. Does paperwork match bottle labels? No 🗌 (<2 or >12 unless noted) (Note discrepancies on chain of custody) Adjusted? 13. Are matrices correctly identified on Chain of Custody? Yes No No 🗌 14. Is it clear what analyses were requested? No 🗌 Checked by: 15. Were all holding times able to be met? Yes (If no, notify customer for authorization.) Special Handling (if applicable) 16. Was client notified of all discrepancies with this order? Yes 🗌 No 🗌 NA 🖈 Person Notified: Date: By Whom: Via: eMail Phone Fax In Person Regarding: Client Instructions: 17. Additional remarks: 18. Cooler Information Temp C Condition Seal Intact Cooler No Seal No Seal Date Signed By 3.6 Good Yes

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