

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

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

Form C-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.

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

14439

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

**RECEIVED**  
By Rvillalobos at 9:54 am, Dec 30, 2015

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

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

1.

Operator: Burlington Resources Oil & Gas Company, LP OGRID #: 14538  
Address: PO BOX 4289, Farmington, NM 87499  
Facility or well name: RHODES C 101  
API Number: 30-045-28964 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr N Section 30 Township 28 N Range 11 W County: San Juan  
Center of Proposed Design: Latitude 36.626418 °N Longitude -108.046451 °W NAD:  1927  1983  
Surface Owner:  Federal  State  Private  Tribal Trust or Indian Allotment

**Constituents Exceed Standards outline  
by 19.15.17.13 NMAC. Please submit a  
separate C-141 under 19.15.29 NMAC**

**BGT Closed Prior  
to Closure Plan  
Approval**

2.

**Pit:** Subsection F, G or J of 19.15.17.11 NMAC  
Temporary:  Drilling  Workover  
 Permanent  Emergency  Cavitation  P&A  Multi-Well Fluid Management Low Chloride Drilling Fluid  yes  no  
 Lined  Unlined Liner type: Thickness \_\_\_\_\_ mil  LLDPE  HDPE  PVC  Other \_\_\_\_\_  
 String-Reinforced  
Liner Seams:  Welded  Factory  Other \_\_\_\_\_ Volume: \_\_\_\_\_ bbl Dimensions: L \_\_\_\_\_ x W \_\_\_\_\_ x D \_\_\_\_\_

3.

**Below-grade tank:** Subsection I of 19.15.17.11 NMAC  
Volume: 120 bbl Type of fluid: Produced Water  
Tank Construction material: Metal  
 Secondary containment with leak detection  Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off  
 Visible sidewalls and liner  Visible sidewalls only  Other \_\_\_\_\_  
Liner type: Thickness \_\_\_\_\_ mil  HDPE  PVC  Other UNSPECIFIED

Two BGT's on location. This permit for North BGT.

4.

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

5.

**Fencing:** Subsection D of 19.15.17.11 NMAC (*Applies to permanent pits, temporary pits, and below-grade tanks*)  
 Chain link, six feet in height, two strands of barbed wire at top (*Required if located within 1000 feet of a permanent residence, school, hospital, institution or church*)  
 Four foot height, four strands of barbed wire evenly spaced between one and four feet  
 Alternate. Please specify \_\_\_\_\_

clw

6. **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

8. **Variations 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 acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.*

### 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

Yes  No  
 NA

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

Yes  No

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

Yes  No

Within a 100-year floodplain. (**Does not apply to below grade tanks**)

- FEMA map

Yes  No

### 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

Yes  No

**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.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

Yes  No

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  Yes  No

Within 500 feet of a wetland.  
 - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site  Yes  No

10.  
**Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC  
*Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.*

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

Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

11.  
**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 documents are attached.*

- 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 19.15.17.9 NMAC 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: \_\_\_\_\_

12.

**Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC

*Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.*

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

13.

**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 Fluid Management Pit  
 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

14.

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

- Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection 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 source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.*

- |   |   |
|---|---|
| Ground water is less than 25 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Ground water is between 25-50 feet below the bottom of the buried waste<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Ground water is more than 100 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells  | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).<br>- Topographic map; Visual inspection (certification) of the proposed site                        | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 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.<br>- NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Written confirmation or verification from the municipality; Written approval obtained from the municipality   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 300 feet of a wetland.<br>US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  
 Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC  
 Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC  
 Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC  
 Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC  
 Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 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 be achieved)  
 Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  
 Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  
 Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 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 belief.

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

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

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

18. **OCD Approval:**  Permit Application (including closure plan)  Closure Plan (only)  OCD Conditions (see attachment) **See Front Page**

OCD Representative Signature: Jonathan D. Kelly Approval Date: 7/11/2016

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. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.*

Closure Completion Date: 12/31/13

20. **Closure Method:**

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

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

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

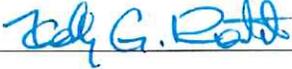
On-site Closure Location: Latitude °N Longitude °W NAD:  1927  1983

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): Kelly G. Roberts Title: Regulatory Technician

Signature:  Date: 12/14/15

e-mail address: Kelly.Roberts@cop.com Telephone: (505) 326-9775

**Burlington Resources Oil & Gas Company, LP**  
**San Juan Basin**  
**Below Grade Tank Closure Report**

**Lease Name: RHODES C 101**

**API No.: 30-045-28964**

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:

1. BR 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, BR 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.**

2. BR 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. BR 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 BR 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. BR will test the soils beneath the below-grade tank to determine whether a release has occurred. BR 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 BR or the division determines that a release has occurred, then BR shall comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC, as appropriate.

**A release was 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 BR 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 of closure was not provided to the Aztec Division office between 72 hours and one week prior to closure.**

9. The surface owner shall be notified of BR'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 not found.**

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 placed 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. BR 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 be 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)**

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

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

Form C-141  
Revised August 8, 2011

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

### Release Notification and Corrective Action

#### OPERATOR

Initial Report  Final Report

Name of Company <b>Burlington Resources, a Wholly Owned Subsidiary of ConocoPhillips Company</b>	Contact <b>Lisa Hunter</b>
Address <b>3401 East 30<sup>th</sup> St, Farmington, NM</b>	Telephone No. <b>(505) 258-1607</b>
Facility Name: <b>Rhodes C #101</b>	Facility Type: <b>Gas Well</b>
Surface Owner <b>Tribal – Navajo Nation</b>	Mineral Owner <b>Federal</b>
API No. <b>3004528964</b>	

#### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
N	30	28N	11W	100'	South	2270	West	San Juan

Latitude 36.62641 Longitude -108.04645 (North BGT)  
Latitude 36.62637 Longitude -108.04648 (South BGT)

#### NATURE OF RELEASE

Type of Release <b>Hydrocarbon</b>	Volume of Release <b>Unknown</b>	Volume Recovered <b>None</b>
Source of Release <b>(2) Below Grade Tank (BGT) Closures North &amp; South BGTs</b>	Date and Hour of Occurrence <b>Unknown</b>	Date and Hour of Discovery <b>12-30-13</b>
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom? <b>N/A</b>	
By Whom? <b>N/A</b>	Date and Hour <b>N/A</b>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. <b>N/A</b>	
If a Watercourse was Impacted, Describe Fully.* <b>N/A</b>		
Describe Cause of Problem and Remedial Action Taken.* <b>Below-Grade Tank Closure activities with samples taken resulting in constituents exceeded standards outlined by 19.15.17.13 NMAC.</b>		
Describe Area Affected and Cleanup Action Taken.* <b>NMOCD action levels for releases are specified in NMOCD's Guidelines for Leaks, Spills and Releases and the release was assigned a ranking score of 0. Samples were collected and analytical results are below applicable NMOCD action levels. No further work will be performed. The final report is attached for review.</b>		
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.		

#### OIL CONSERVATION DIVISION

Signature: 	Approved by Environmental Specialist:	
Printed Name: <b>Lisa Hunter</b>	Approval Date:	Expiration Date:
Title: <b>Field Environmental Specialist</b>	Conditions of Approval:	
E-mail Address: <b>Lisa.Hunter@cop.com</b>	Attached <input type="checkbox"/>	
Date: <b>December 14, 2015</b>	Phone: <b>(505) 258-1607</b>	

\* Attach Additional Sheets If Necessary



Animas Environmental Services, LLC

[www.animasenvironmental.com](http://www.animasenvironmental.com)

624 E. Comanche  
Farmington, NM 87401  
505-564-2281

Durango, Colorado  
970-403-3084

January 23, 2014

Lindsay Dumas  
ConocoPhillips  
San Juan Business Unit  
Office 214-07  
5525 Hwy 64  
Farmington, New Mexico 87401

Via electronic mail to: [SJBUE-Team@ConocoPhillips.com](mailto:SJBUE-Team@ConocoPhillips.com)

**RE: Below Grade Tank Closure Report  
Rhodes C #101  
San Juan County, New Mexico**

Dear Ms. Dumas:

Animas Environmental Services, LLC (AES) is pleased to provide the final report associated with two below grade tank (BGT) closures at ConocoPhillips (CoP) Rhodes C #101, located in San Juan County, New Mexico. Removal of both tanks had been completed by CoP contractors prior to AES' arrival at the location.

---

## 1.0 Site Information

### 1.1 Location

Site Name – Rhodes C #101

Legal Description – SE¼ SW¼, Section 30, T28N, R11W, San Juan County, New Mexico

Well Latitude/Longitude – N36.62619 and W108.04624, respectively

North BGT Latitude/Longitude – N36.62641 and W108.04645, respectively

South BGT Latitude/Longitude – N36.62637 and W108.04648, respectively

Land Jurisdiction – Bureau of Land Management

Figure 1. Topographic Site Location Map

Figure 2. Aerial Site Map, December 2013

### 1.2 NMOCD Ranking

In accordance with the New Mexico Oil Conservation Division (NMOCD) *Guidelines for Remediation of Leaks, Spills, and Releases* (August 1993), the location was given a ranking score of 0 based on the following factors:

- **Depth to Groundwater:** A cathodic report form dated January 1994 reported dampness at 65 feet below ground surface (bgs) and fresh water at 350 feet bgs. (0 points)
- **Wellhead Protection Area:** The tank locations are not within a wellhead protection area. (0 points)
- **Distance to Surface Water Body:** The wash is Horn Canyon is located approximately 3,500 feet east of the location. (0 points)

### 1.3 BGT Closure Assessment

AES was initially contacted by Dan Rudder, CoP representative, on December 30, 2013, and on December 31, 2013, Deborah Watson and Jesse Christopherson of AES mobilized to the location. AES personnel collected six soil samples from below each BGT liner. Four samples were collected from the perimeter of each BGT footprint, one sample was collected from the center of each BGT footprint, and one sample was composited from the four perimeter samples and one center sample of each BGT.

---

## 2.0 Soil Sampling

On December 31, 2013, AES personnel conducted field screening and collected ten soil samples (S-1 through S-10) and two 5-point composites (SC-1 and SC-2) from below the BGTs. Soil samples were collected from approximately 0.5 feet below the former BGTs for field screening of volatile organic compounds (VOCs) and total petroleum hydrocarbon (TPH). Soil samples SC-1 and SC-2 were field screened for VOCs and chlorides and were submitted for confirmation laboratory analysis. Soil sample locations are included on Figure 2.

### 2.1 Field Screening

#### 2.1.1 Volatile Organic Compounds

A portion of each sample was utilized for field screening of VOC vapors with a photo-ionization detector (PID) organic vapor meter (OVM). Before beginning field screening, the PID-OVM was first calibrated with 100 parts per million (ppm) isobutylene gas.

#### 2.1.2 Total Petroleum Hydrocarbons

Soil samples were also analyzed in the field for TPH per USEPA Method 418.1 using a Buck Scientific Model HC-404 Total Hydrocarbon Analyzer Infrared Spectrometer (Buck). A 3-point calibration was completed prior to conducting soil analyses. Field analytical protocol followed AES's *Standard Operating Procedure: Field Analysis Total Petroleum Hydrocarbons per EPA Method 418.1*.

### 2.1.3 Chlorides

Soil samples SC-1 and SC-2 were field screened for chlorides using Chloride Drop Count Titration with silver nitrate. Sampling and analysis methods followed procedures provided by Hach Company.

## 2.2 Laboratory Analyses

The composite soil samples SC-1 and SC-2 collected for laboratory analysis were each placed into a new, clean, laboratory-supplied container, which was then labeled, placed on ice, and logged onto a sample chain of custody record. Each sample was maintained on ice until delivery to the analytical laboratory, Hall Environmental Analysis Laboratory (Hall), in Albuquerque, New Mexico. Soil samples SC-1 and SC-2 were laboratory analyzed for:

- Benzene, toluene, ethylbenzene, and xylene (BTEX) per U.S. Environmental Protection Agency (USEPA) Method 8021B; and
- Chloride per USEPA Method 300.0.

In addition, sample SC-1 was laboratory analyzed for:

- TPH for gasoline range organics (GRO) and diesel range organics (DRO) per USEPA Method 8015D.

## 2.3 Field and Laboratory Analytical Results

North BGT field screening readings for VOCs via OVM were each measured at 0.0 ppm. Field TPH concentrations ranged from 28.2 mg/kg in S-2 up to 109 mg/kg in S-3. The field chloride concentration in SC-1 was 80 mg/kg.

South BGT field screening readings for VOCs via OVM were also each measured at 0.0 ppm. TPH concentrations ranged from 24.1 mg/kg in S-7 up to 43.0 mg/kg in S-8. The field chloride concentration in SC-2 was 80 mg/kg. Field screening results are summarized in Table 1 and presented on Figure 2. The AES Field Screening Reports are attached.

Table 1. Soil Field Screening VOCs, TPH, and Chloride Results  
Rhodes C #101 BGT Closure, December 2013

<i>Sample ID</i>	<i>Date Sampled</i>	<i>Depth below BGT (ft)</i>	<i>VOCs OVM Reading (ppm)</i>	<i>Field TPH (mg/kg)</i>	<i>Field Chlorides (mg/kg)</i>
<b>NMOCED Action Level (NMAC 19.15.17.13E)</b>			--	<b>100</b>	<b>250</b>
S-1 (North)	12/31/13	0.5	0.0	41.6	NA
S-2 (North)	12/31/13	0.5	0.0	28.2	NA
S-3 (North)	12/31/13	0.5	0.0	109	NA
S-4 (North)	12/31/13	0.5	0.0	60.5	NA
S-5 (North)	12/31/13	0.5	0.0	55.1	NA
SC-1 (North)	12/31/13	0.5	0.0	NA	80
S-6 (South)	12/31/13	0.5	0.0	36.2	NA
S-7 (South)	12/31/13	0.5	0.0	24.1	NA
S-8 (South)	12/31/13	0.5	0.0	43.0	NA
S-9 (South)	12/31/13	0.5	0.0	33.5	NA
S-10 (South)	12/31/13	0.5	0.0	26.8	NA
SC-2 (South)	12/31/13	0.5	0.0	NA	80

NA - not analyzed

Laboratory analytical results reported benzene and total BTEX concentrations in SC-1 as less than 0.035 mg/kg and 0.175 mg/kg, respectively. TPH concentrations as GRO and DRO were reported at less than 3.5 mg/kg and 9.9 mg/kg, respectively. The laboratory chloride concentration was reported at 270 mg/kg.

In SC-2, laboratory analytical results reported benzene and total BTEX concentrations as less than 0.035 mg/kg and 0.176 mg/kg, respectively. The laboratory chloride concentration was reported at 660 mg/kg. Laboratory analytical results are summarized in Table 2 and included on Figure 2. The laboratory analytical report is attached.

Table 2. Soil Laboratory Analytical Results  
Rhodes C #101 BGT Closure, December 2013

Sample ID	Date Sampled	Depth (ft)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH-GRO (mg/kg)	TPH-DRO (mg/kg)	Chlorides (mg/kg)
<i>NMOCD Action Level (NMAC 19.15.17.13E)</i>			0.2	50		100	250
SC-1 (North)	12/31/13	0.5	<0.035	<0.175	<3.5	<9.9	270
SC-2 (South)	12/31/13	0.5	<0.035	<0.176	NA	NA	660

NA - not analyzed

### 3.0 Conclusions and Recommendations

NMOCD action levels for BGT closures are specified in New Mexico Administrative Code (NMAC) 19.15.17.13E. For the north BGT, field TPH concentrations exceeded the NMOCD action level of 100 mg/kg in one sample, S-3, with 109 mg/kg; however, laboratory analytical results for TPH (as GRO/DRO) in SC-1 were reported below the NMOCD action level of 100 mg/kg. For the south BGT, field TPH concentrations were below the NMOCD action level of 100 mg/kg, with the highest concentration reported in S-8 with 43.0 mg/kg. Benzene and total BTEX concentrations in SC-1 and SC-2 were below the NMOCD action levels of 0.2 mg/kg and 50 mg/kg, respectively.

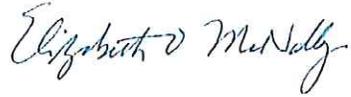
Chloride concentrations in SC-1 and SC-2 were reported above the NMOCD action level of 250 mg/kg; however, on January 2, 2014, CoP received approval to backfill the BGTs from Brandon Powell of the NMOCD. Based on field screening and laboratory analytical results for benzene, total BTEX, TPH, and chlorides, no further work is recommended at Rhodes C #101.

If you have any questions about this report or site conditions, please do not hesitate to contact Deborah Watson at (505) 564-2281.

Sincerely,



David J. Reese  
Environmental Scientist

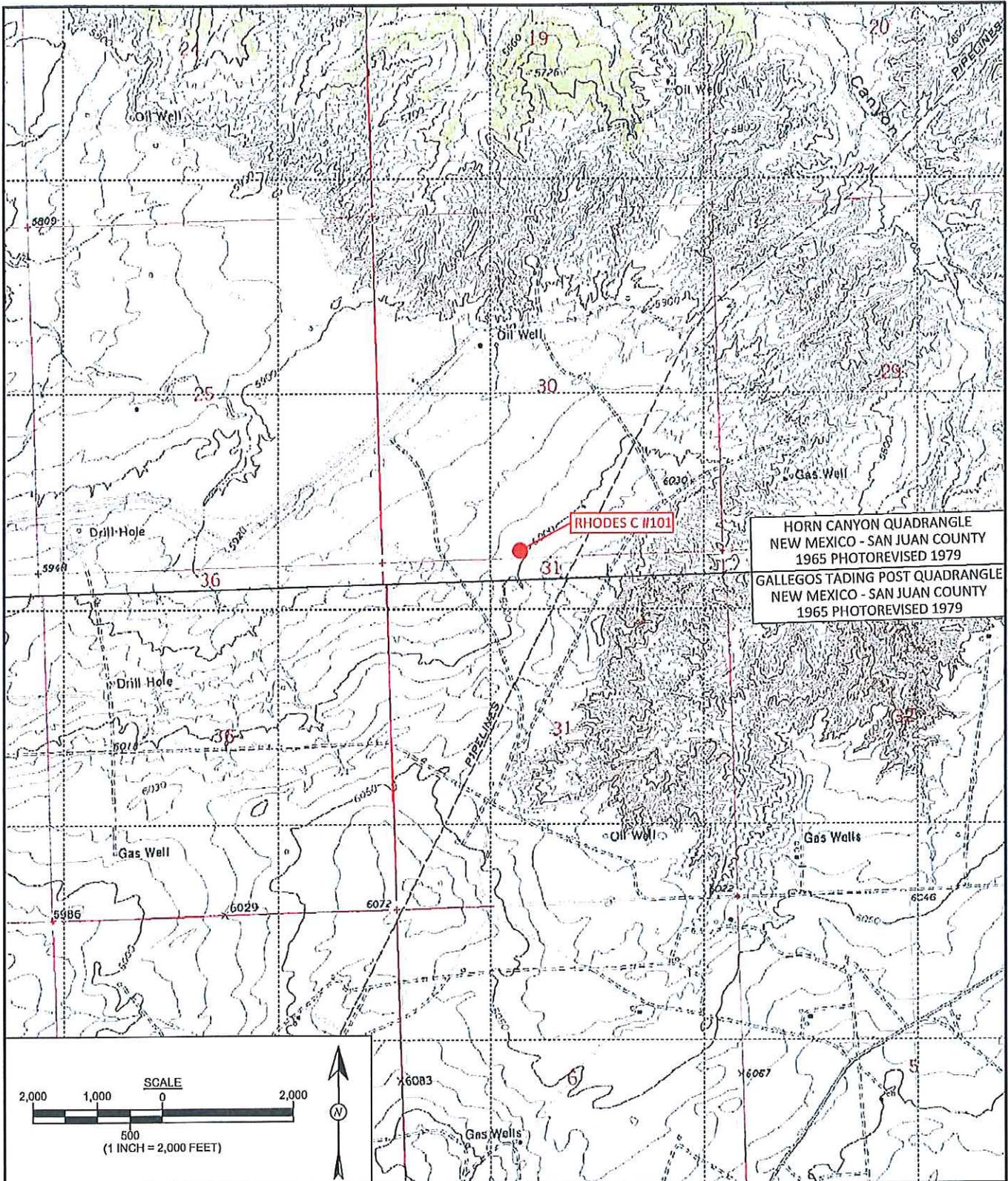


Elizabeth McNally, P.E.

Attachments:

- Figure 1. Topographic Site Location Map
- Figure 2. Aerial Site Map, December 2013
- AES Field Screening Report 123113
- Hall Analytical Report 1401004

R:\Animas 2000\Dropbox\0000 Animas Server Dropbox EM\2014 Projects\ConocoPhillips\rhodes C #101\rhodes C #101 BGT Closure Report 012314.docx



HORN CANYON QUADRANGLE  
 NEW MEXICO - SAN JUAN COUNTY  
 1965 PHOTOREVISED 1979

GALLEGOS TADING POST QUADRANGLE  
 NEW MEXICO - SAN JUAN COUNTY  
 1965 PHOTOREVISED 1979

2,000 1,000 0 2,000  
 SCALE  
 500  
 (1 INCH = 2,000 FEET)



Animas Environmental Services, LLC

DRAWN BY: S. Glasses	DATE DRAWN: January 2, 2014
REVISIONS BY: C. Lameman	DATE REVISED: January 2, 2014
CHECKED BY: D. Watson	DATE CHECKED: January 2, 2014
APPROVED BY: E. McNally	DATE APPROVED: January 2, 2014

**FIGURE 1**

**TOPOGRAPHIC SITE LOCATION MAP**  
 ConocoPhillips  
 RHODES C #101  
 SE¼ SW¼, SECTION 30, T28N, R11W  
 SAN JUAN COUNTY, NEW MEXICO  
 N36.62619, W108.04624

**LEGEND**

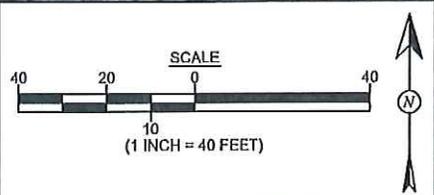
● SAMPLE LOCATIONS

Field Screening Results				
Sample ID	Date	OVM-PID (ppm)	TPH (mg/kg)	Chlorides (mg/kg)
<b>NMOC ACTION LEVEL</b>		--	100	250
S-1	12/31/13	0.0	41.6	NA
S-2	12/31/13	0.0	28.2	NA
S-3	12/31/13	0.0	109	NA
S-4	12/31/13	0.0	60.5	NA
S-5	12/31/13	0.0	55.1	NA
SC-1	12/31/13	0.0	NA	80
S-6	12/31/13	0.0	36.2	NA
S-7	12/31/13	0.0	24.1	NA
S-8	12/31/13	0.0	43.0	NA
S-9	12/31/13	0.0	33.5	NA
S-10	12/31/13	0.0	26.8	NA
SC-2	12/31/13	0.0	NA	80

Laboratory Analytical Results						
Sample ID	Date	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH - GRO (mg/kg)	TPH - DRO (mg/kg)	Chlorides (mg/kg)
<b>NMOC ACTION LEVEL</b>		0.2	50	100		250
SC-1	12/31/13	<0.035	<0.175	<3.5	<9.9	270
SC-2	12/31/13	<0.035	<0.176	NA	NA	660

SC-1 WAS ANALYZED PER EPA METHOD 8021B, 8015D AND 300.0.  
 SC-2 WAS ANALYZED PER EPA METHOD 8021B AND 300.0.

SC-1 IS A 5-POINT COMPOSITE SAMPLE OF S-1 THROUGH S-5.  
 SC-2 IS A 5-POINT COMPOSITE SAMPLE OF S-6 THROUGH S-10.  
 NA - NOT ANALYZED



AERIAL SOURCE: © 2013 GOOGLE EARTH, AERIAL DATE: JUNE 10, 2011



Animas Environmental Services, LLC

<b>DRAWN BY:</b> S. Glasses	<b>DATE DRAWN:</b> January 2, 2014
<b>REVISIONS BY:</b> C. Lameman	<b>DATE REVISED:</b> January 2, 2014
<b>CHECKED BY:</b> D. Watson	<b>DATE CHECKED:</b> January 2, 2014
<b>APPROVED BY:</b> E. McNally	<b>DATE APPROVED:</b> January 2, 2014

**FIGURE 2**

**AERIAL SITE MAP  
 BELOW GRADE TANK CLOSURE  
 DECEMBER 2013**

ConocoPhillips  
 RHODES C #101

SE¼ SW¼, SECTION 30, T28N, R11W  
 SAN JUAN COUNTY, NEW MEXICO  
 N36.62619, W108.04624



Animas Environmental Services, LLC

www.animasenvironmental.com

624 E. Comanche  
Farmington, NM 87401  
505-564-2281

Durango, Colorado  
970-408-3084

# AES Field Screening Report

Client: ConocoPhillips

Project Location: Rhodes C #101 North BGT

Date: 12/31/2013

Matrix: Soil

Sample ID	Collection Date	Time of Sample Collection	Sample Locations	OVM (ppm)	Field Chloride (mg/kg)	Field TPH Analysis Time	Field TPH* (mg/kg)	TPH PQL (mg/kg)	DF	TPH Analysts Initials
S-1	12/31/2013	11:40	North	0.0	NA	12:34	41.6	20.0	1	DAW
S-2	12/31/2013	11:41	South	0.0	NA	12:36	28.2	20.0	1	DAW
S-3	12/31/2013	11:43	East	0.0	NA	12:38	109	20.0	1	DAW
S-4	12/31/2013	11:44	West	0.0	NA	12:40	60.5	20.0	1	DAW
S-5	12/31/2013	11:45	Center	0.0	NA	12:42	55.1	20.0	1	DAW
SC-1	12/31/2013	12:00	Composite	0.0	80	Not Analyzed for TPH				

Field Chloride - Quantab Chloride Titrators or Drop Count  
Titration with Silver Nitrate  
Total Petroleum Hydrocarbons - USEPA 418.1

Analyst: *Dorinda White*

DF Dilution Factor  
NA Not Analyzed  
ND Not Detected at the Reporting Limit  
PQL Practical Quantitation Limit  
\*Field TPH concentrations recorded may be below PQL.



Animas Environmental Services, LLC

www.animasenvironmental.com

624 E. Comanche  
Farmington, NM 87401  
505-564-2281

Durango, Colorado  
970-403-3084

# AES Field Screening Report

Client: ConocoPhillips

Project Location: Rhodes C #101 South BGT

Date: 12/31/2013

Matrix: Soil

Sample ID	Collection Date	Time of Sample Collection	Sample Location	OVM (ppm)	Field Chloride (mg/kg)	Field TPH Analysis Time	Field TPH* (mg/kg)	TPH PQL (mg/kg)	DF	TPH Analysts Initials
S-6	12/31/2013	11:47	North	0.0	NA	12:45	36.2	20.0	1	DAW
S-7	12/31/2013	11:48	South	0.0	NA	12:47	24.1	20.0	1	DAW
S-8	12/31/2013	11:50	East	0.0	NA	12:49	43.0	20.0	1	DAW
S-9	12/31/2013	11:52	West	0.0	NA	12:51	33.5	20.0	1	DAW
S-10	12/31/2013	11:54	Center	0.0	NA	12:53	26.8	20.0	1	DAW
SC-2	12/31/2013	12:05	Composite	0.0	80	Not Analyzed for TPH				

Field Chloride - Quantab Chloride Titrators or Drop Count  
Titration with Silver Nitrate  
Total Petroleum Hydrocarbons - USEPA 418.1

Analyst:

DF Dilution Factor  
NA Not Analyzed  
ND Not Detected at the Reporting Limit  
PQL Practical Quantitation Limit

\*Field TPH concentrations recorded may be below PQL.



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

January 07, 2014

Debbie Watson  
Animas Environmental  
624 East Comanche  
Farmington, NM 87401  
TEL: (505) 486-4071  
FAX

RE: COP Rhodes C #101

OrderNo.: 1401004

Dear Debbie Watson:

Hall Environmental Analysis Laboratory received 2 sample(s) on 1/2/2014 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](http://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 qualifiers 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,

A handwritten signature in black ink, appearing to read 'Andy Freeman', is written over a white background.

Andy Freeman  
Laboratory Manager  
4901 Hawkins NE  
Albuquerque, NM 87109

**Hall Environmental Analysis Laboratory, Inc.**

CLIENT: Animas Environmental Client Sample ID: SC-1  
 Project: COP Rhodes C #101 Collection Date: 12/31/2013 12:00:00 PM  
 Lab ID: 1401004-001 Matrix: MEOH (SOIL) Received Date: 1/2/2014 9:57:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
<b>EPA METHOD 8015D: DIESEL RANGE ORGANICS</b>							Analyst: BCN
Diesel Range Organics (DRO)	ND	9.9		mg/Kg	1	1/2/2014 12:11:01 PM	11053
Surr: DNOP	86.6	66-131		%REC	1	1/2/2014 12:11:01 PM	11053
<b>EPA METHOD 8015D: GASOLINE RANGE</b>							Analyst: NSB
Gasoline Range Organics (GRO)	ND	3.5		mg/Kg	1	1/2/2014 12:03:16 PM	R15860
Surr: BFB	90.5	74.5-129		%REC	1	1/2/2014 12:03:16 PM	R15860
<b>EPA METHOD 8021B: VOLATILES</b>							Analyst: NSB
Benzene	ND	0.035		mg/Kg	1	1/2/2014 12:03:16 PM	R15860
Toluene	ND	0.035		mg/Kg	1	1/2/2014 12:03:16 PM	R15860
Ethylbenzene	ND	0.035		mg/Kg	1	1/2/2014 12:03:16 PM	R15860
Xylenes, Total	ND	0.070		mg/Kg	1	1/2/2014 12:03:16 PM	R15860
Surr: 4-Bromofluorobenzene	102	80-120		%REC	1	1/2/2014 12:03:16 PM	R15860
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: JRR
Chloride	270	30		mg/Kg	20	1/2/2014 12:05:40 PM	11057

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

Qualifiers:	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
	E Value above quantitation range	H Holding times for preparation or analysis exceeded
	J Analyte detected below quantitation limits	ND Not Detected at the Reporting Limit
	O RSD is greater than RSDlimit	P Sample pH greater than 2 for VOA and TOC only.
	R RPD outside accepted recovery limits	RL Reporting Detection Limit
	S Spike Recovery outside accepted recovery limits	

**Hall Environmental Analysis Laboratory, Inc.**

**CLIENT:** Animas Environmental  
**Project:** COP Rhodes C #101  
**Lab ID:** 1401004-002

**Client Sample ID:** SC-2  
**Collection Date:** 12/31/2013 12:05:00 PM  
**Received Date:** 1/2/2014 9:57:00 AM

**Matrix:** MEOH (SOIL)

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
<b>EPA METHOD 8021B: VOLATILES</b>							Analyst: <b>NSB</b>
Benzene	ND	0.035		mg/Kg	1	1/2/2014 12:31:52 PM	R15860
Toluene	ND	0.035		mg/Kg	1	1/2/2014 12:31:52 PM	R15860
Ethylbenzene	ND	0.035		mg/Kg	1	1/2/2014 12:31:52 PM	R15860
Xylenes, Total	ND	0.071		mg/Kg	1	1/2/2014 12:31:52 PM	R15860
Surr: 4-Bromofluorobenzene	105	80-120		%REC	1	1/2/2014 12:31:52 PM	R15860
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: <b>JRR</b>
Chloride	660	30		mg/Kg	20	1/2/2014 12:18:04 PM	11057

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

<b>Qualifiers:</b>	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
	J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
	O	RSD is greater than RSDlimit	P	Sample pH greater than 2 for VOA and TOC only.
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	Spike Recovery outside accepted recovery limits		

**QC SUMMARY REPORT**  
**Hall Environmental Analysis Laboratory, Inc.**

WO#: 1401004  
 07-Jan-14

**Client:** Animas Environmental  
**Project:** COP Rhodes C #101

Sample ID	MB-11057	SampType:	MBLK	TestCode:	EPA Method 300.0: Anions					
Client ID:	PBS	Batch ID:	11057	RunNo:	15874					
Prep Date:	1/2/2014	Analysis Date:	1/2/2014	SeqNo:	457878	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-11057	SampType:	LCS	TestCode:	EPA Method 300.0: Anions					
Client ID:	LCSS	Batch ID:	11057	RunNo:	15874					
Prep Date:	1/2/2014	Analysis Date:	1/2/2014	SeqNo:	457879	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	92.2	90	110			

**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
- II Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2 for VOA and TOC only.
- RL Reporting Detection Limit

**QC SUMMARY REPORT**  
**Hall Environmental Analysis Laboratory, Inc.**

WO#: 1401004  
 07-Jan-14

Client: Animas Environmental  
 Project: COP Rhodes C #101

Sample ID	MB-11053	SampType:	MBLK	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	PBS	Batch ID:	11053	RunNo:	15837					
Prep Date:	1/2/2014	Analysis Date:	1/2/2014	SeqNo:	457353	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Surr: DNOP	8.1		10.00		80.9	66	131			

Sample ID	LCS-11053	SampType:	LCS	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	LCSS	Batch ID:	11053	RunNo:	15837					
Prep Date:	1/2/2014	Analysis Date:	1/2/2014	SeqNo:	457354	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	59	10	50.00	0	117	60.8	145			
Surr: DNOP	4.5		5.000		89.4	66	131			

Sample ID	1401004-001AMS	SampType:	MS	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	SC-1	Batch ID:	11053	RunNo:	15837					
Prep Date:	1/2/2014	Analysis Date:	1/2/2014	SeqNo:	457425	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	48	10	50.05	0	95.8	47.4	148			
Surr: DNOP	4.5		5.005		89.2	66	131			

Sample ID	1401004-001AMSD	SampType:	MSD	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	SC-1	Batch ID:	11053	RunNo:	15837					
Prep Date:	1/2/2014	Analysis Date:	1/2/2014	SeqNo:	457514	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	49	10	50.05	0	98.5	47.4	148	2.76	22.7	
Surr: DNOP	4.5		5.005		90.5	66	131	0	0	

**Qualifiers:**

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**QC SUMMARY REPORT**  
**Hall Environmental Analysis Laboratory, Inc.**

WO#: 1401004

07-Jan-14

**Client:** Animas Environmental  
**Project:** COP Rhodes C #101

Sample ID	MB-11036 MK	SampType:	MBLK	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	PBS	Batch ID:	R15860	RunNo:	15860					
Prep Date:		Analysis Date:	1/2/2014	SeqNo:	457683	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	920		1000		92.4	74.5	129			

Sample ID	LCS-11036 MK	SampType:	LCS	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	LCSS	Batch ID:	R15860	RunNo:	15860					
Prep Date:		Analysis Date:	1/2/2014	SeqNo:	457684	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	28	5.0	25.00	0	112	74.5	126			
Surr: BFB	1000		1000		103	74.5	129			

**Qualifiers:**

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- 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
- P Sample pH greater than 2 for VOA and TOC only.
- RL Reporting Detection Limit

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1401004  
07-Jan-14

Client: Animas Environmental  
Project: COP Rhodes C #101

Sample ID	MB-11036 MK	SampType:	MBLK	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	PBS	Batch ID:	R15860	RunNo:	15860					
Prep Date:		Analysis Date:	1/2/2014	SeqNo:	457821	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.050								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.1		1.000		106	80	120			

Sample ID	LGS-11036 MK	SampType:	LCS	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	LCSS	Batch ID:	R15860	RunNo:	15860					
Prep Date:		Analysis Date:	1/2/2014	SeqNo:	457822	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.1	0.050	1.000	0	113	80	120			
Toluene	1.1	0.050	1.000	0	110	80	120			
Ethylbenzene	1.1	0.050	1.000	0	111	80	120			
Xylenes, Total	3.3	0.10	3.000	0	110	80	120			
Surr: 4-Bromofluorobenzene	1.1		1.000		114	80	120			

### Qualifiers:

- \* Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
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Hall Environmental Analysis Laboratory  
 4901 Hawkins NE  
 Albuquerque, NM 87105  
 TEL: 505-345-3975 FAX: 505-345-4107  
 Website: www.hallenvironmental.com

# Sample Log-In Check List

Client Name: Animas Environmental

Work Order Number: 1401004

RcptNo: 1

Received by/date: AS 01/02/14

Logged By: Lindsay Mangin 1/2/2014 9:57:00 AM *Lindsay Mangin*

Completed By: Lindsay Mangin 1/2/2014 10:01:48 AM *Lindsay Mangin*

Reviewed By: JS 01/02/14

### Chain of Custody

- Custody seals intact on sample bottles? Yes  No  Not Present
- Is Chain of Custody complete? Yes  No  Not Present
- How was the sample delivered? Courier

### Log In

- Was an attempt made to cool the samples? Yes  No  NA
- Were all samples received at a temperature of >0° C to 6.0°C? Yes  No  NA
- Sample(s) in proper container(s)? Yes  No
- Sufficient sample volume for indicated test(s)? Yes  No
- Are samples (except VOA and ONG) properly preserved? Yes  No
- Was preservative added to bottles? Yes  No  NA
- VOA vials have zero headspace? Yes  No  No VOA Vials
- Were any sample containers received broken? Yes  No
- Does paperwork match bottle labels?  
(Note discrepancies on chain of custody) Yes  No
- Are matrices correctly identified on Chain of Custody? Yes  No
- Is it clear what analyses were requested? Yes  No
- Were all holding times able to be met?  
(If no, notify customer for authorization.) Yes  No

# of preserved bottles checked for pH: \_\_\_\_\_  
 (<2 or >12 unless noted)  
 Adjusted? \_\_\_\_\_  
 Checked by: \_\_\_\_\_

### Special Handling (if applicable)

- 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

Cooler No.	Temp. °C	Condition	Seal Intact	Seal No.	Seal Date	Signed By
1	1.0	Good	Yes			



# Rhodes C 101

