

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

- 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

15829

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: ConocoPhillips Company OGRID #: 217817 **OIL CONS. DIV DIST. 3**
Address: PO BOX 4289, Farmington, NM 87499 **JAN 31 2017**
Facility or well name: OHIO 1E
API Number: 30-045-24037-24406 OCD Permit Number: _____
U/L or Qtr/Qtr G Section 22 Township 28N Range 11W County: San Juan
Center of Proposed Design: Latitude 36.65013 °N Longitude -107.98830 °W NAD: 1927 1983
Surface Owner: Federal State Private Tribal Trust or Indian Allotment

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

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 _____

30

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: _____

12.7

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 H₂S, 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. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
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	<input type="checkbox"/> Yes <input type="checkbox"/> No <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). - 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. - 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. - 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. 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	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

Yes No

Within a 100-year floodplain.

- FEMA map

Yes 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.

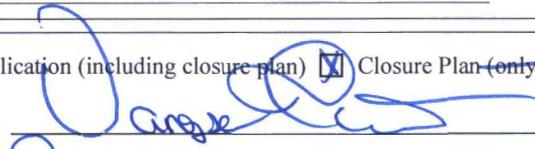
Name (Print): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

18.

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

OCD Representative Signature:  Approval Date: 2-1-2017

Title: Environmental Specialist 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: 12/20/16

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

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) Christine Brock Title: Regulatory Specialist

Signature: *Christine Brock* Date: 11/26/17

e-mail address: christine.brock@cop.com Telephone: (505) 326-9775

ConocoPhillips Company
San Juan Basin
Below Grade Tank Closure Report

Lease Name: OHIO 1E
API No.: 30-045-24406

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. 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.

2. 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:
- Operator's name
 - 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. (See Attached) (Well located on Federal Land, certified mail is not required for Federal Land per BLM/OCD MOU.)

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. 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 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)**

Walker, Crystal

From: Busse, Dollie L
Sent: Tuesday, December 13, 2016 7:32 AM
To: 'Smith, Cory, EMNRD'; Vanessa.Fields@state.nm.us; 'Brandon.Powell@state.nm.us'
Cc: Whitney Thomas - BLM (l1thomas@blm.gov); Maureen Joe (mjoe@blm.gov); Payne, Wendy F; Trujillo, Fasho D; Walker, Crystal; Brock, Christine
Subject: Ohio 1E - 72 Hour BGT Closure Notification
Importance: High

Subject: 72 Hour BGT Closure Notification

Anticipated Start Date: **Tuesday, 12/20/2016 at approximately 9:00 a.m.**

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: Ohio 1E
API#: 3004524406
Location: Unit G (SWNE), Section 22, T28N, R11W
Footages: 1740' FNL & 1800' FEL
Operator: ConocoPhillips **Surface Owner:** BLM (Lease #NM-020499)
Reason: P&A'd 7/14/2016

Dollie L. Busse
Regulatory Technician
ConocoPhillips Company
505-324-6104
505-787-9959
Dollie.L.Busse@cop.com

District I
1625 N. French Dr., Hobbs, NM 88240
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1301 W. Grand Avenue, Artesia, NM 88210
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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 ConocoPhillips	Contact Christine Brock
Address 3401 East 30 th St, Farmington, NM	Telephone No.(505) 326-9775
Facility Name: Ohio 1E	Facility Type: Gas Well

Surface Owner Federal	Mineral Owner Federal	API No. 30-045-24406
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LOCATION OF RELEASE

Unit Letter G	Section 22	Township 28N	Range 11W	Feet from the 1740	North/South Line North	Feet from the 1800	East/West Line East	County San Juan
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Latitude 36.65013 Longitude -107.98830

NATURE OF RELEASE

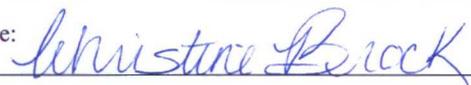
Type of Release	Volume of Release	Volume Recovered
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*
N/A

Describe Cause of Problem and Remedial Action Taken.*
No release was encountered during the BGT Closure.

Describe Area Affected and Cleanup Action Taken.*
N/A

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

Signature: 	<u>OIL CONSERVATION DIVISION</u>	
Printed Name: Christine Brock	Approved by Environmental Specialist:	
Title: Regulatory Specialist	Approval Date:	Expiration Date:
E-mail Address: christine.brock@cop.com	Conditions of Approval:	
Date: <u>1/26/17</u> Phone: (505) 326-9775	Attached <input type="checkbox"/>	

* Attach Additional Sheets If Necessary

Rule Engineering, LLC

Solutions to Regulations for Industry

January 23, 2017

Mr. Robert Spearman
ConocoPhillips
San Juan Business Unit
5525 Highway 64
Farmington, New Mexico 87401

**Re: Ohio #1E
Below Grade Tank Closure Sampling Report**

Dear Mr. Spearman:

This report summarizes the below grade tank (BGT) closure sampling activities conducted by Rule Engineering, LLC (Rule) at the ConocoPhillips Ohio #1E located in Unit Letter G, Section 22, Township 28N, Range 11W in San Juan County, New Mexico. Activities included collection and analysis of a 5-point composite soil confirmation sample from beneath the BGT on December 20, 2016. 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 – Ohio #1E

Location – Unit Letter G, Section 22, Township 28N, Range 11W

API Number – 30-045-24406

Wellhead Latitude/Longitude – N36.65006 and W107.98808

BGT Latitude/Longitude – N36.65013 and W107.98830

Land Jurisdiction – Bureau of Land Management

Size of BGT – 120 barrels

Date of BGT Closure Soil Sampling – December 20, 2016

BGT Closure Standards

As outlined in 19.15.17.13 New Mexico Administrative Code (NMAC), BGT closure standards for the Ohio #1E are as follows: 0.2 milligrams per kilogram (mg/kg) benzene, 50 mg/kg total benzene, toluene, ethylbenzene, and total xylenes (BTEX), 100 mg/kg total petroleum hydrocarbons (TPH), and 250 mg/kg chlorides.

Field Activities

On December 20, 2016, following removal of the BGT, 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 floor of the BGT excavation. Figure 2 provides 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 floor of the BGT excavation 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 TPH.

Field screening for VOC vapors was conducted with a photo-ionization detector (PID). Prior to field screening, the PID was calibrated with 100 parts per million (ppm) isobutylene gas. Field analysis for TPH was conducted per U.S. Environmental Protection Agency (USEPA) Method 418.1, utilizing a total hydrocarbon analyzer. Prior to field analysis, the analyzer was calibrated following the manufacturer's procedure which includes calculation of a calibration curve using known concentration standards. Rule's reporting limit for TPH using this method is 20 mg/kg. Field screening for chloride was conducted using the Hach chloride low range test kit. Chloride concentrations were determined by drop count titration method using silver nitrate titrant.

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 8015M/D, and chlorides per USEPA Method 300.0.

Field and Analytical Results

Field sampling results for soil confirmation sample SC-1 indicated a VOC concentration of 0.0 ppm and a TPH concentration below the reporting limit of 20 mg/kg. Field chloride concentrations were recorded at 60 mg/kg.

Laboratory analytical results for sample SC-1 reported benzene and total BTEX concentrations below the laboratory reporting limits of 0.024 mg/kg and 0.215 mg/kg, respectively. Laboratory analytical results for sample SC-1 reported the TPH concentrations below the laboratory reporting limit of 19 mg/kg by USEPA Method 418.1, below the laboratory reporting limit of 4.8 mg/kg as gasoline range organics per USEPA Method 8015D, and below the laboratory reporting limit of 9.7 mg/kg diesel range organics by USEPA Method 8015M/D. The laboratory analytical result for sample SC-1 for chloride concentration was reported below the laboratory reporting limit of 30 mg/kg. Field and laboratory results for sample SC-1 are summarized in Table 1, and the analytical laboratory report is attached.

Conclusions

On December 20, 2016, BGT closure sampling activities were conducted at the ConocoPhillips Ohio #1E. Field and laboratory results for confirmation 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

Mr. Robert Spearman
Ohio #1E BGT Closure Sampling Report
January 23, 2017
Page 3 of 3

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



Heather M. Woods, P.G.
Area Manager/Geologist

Attachments:

Table 1. BGT Soil Sampling Results
Figure 1. Topographic Map
Figure 2. Aerial Site Map
Field Work Summary Sheet
Analytical Laboratory Report

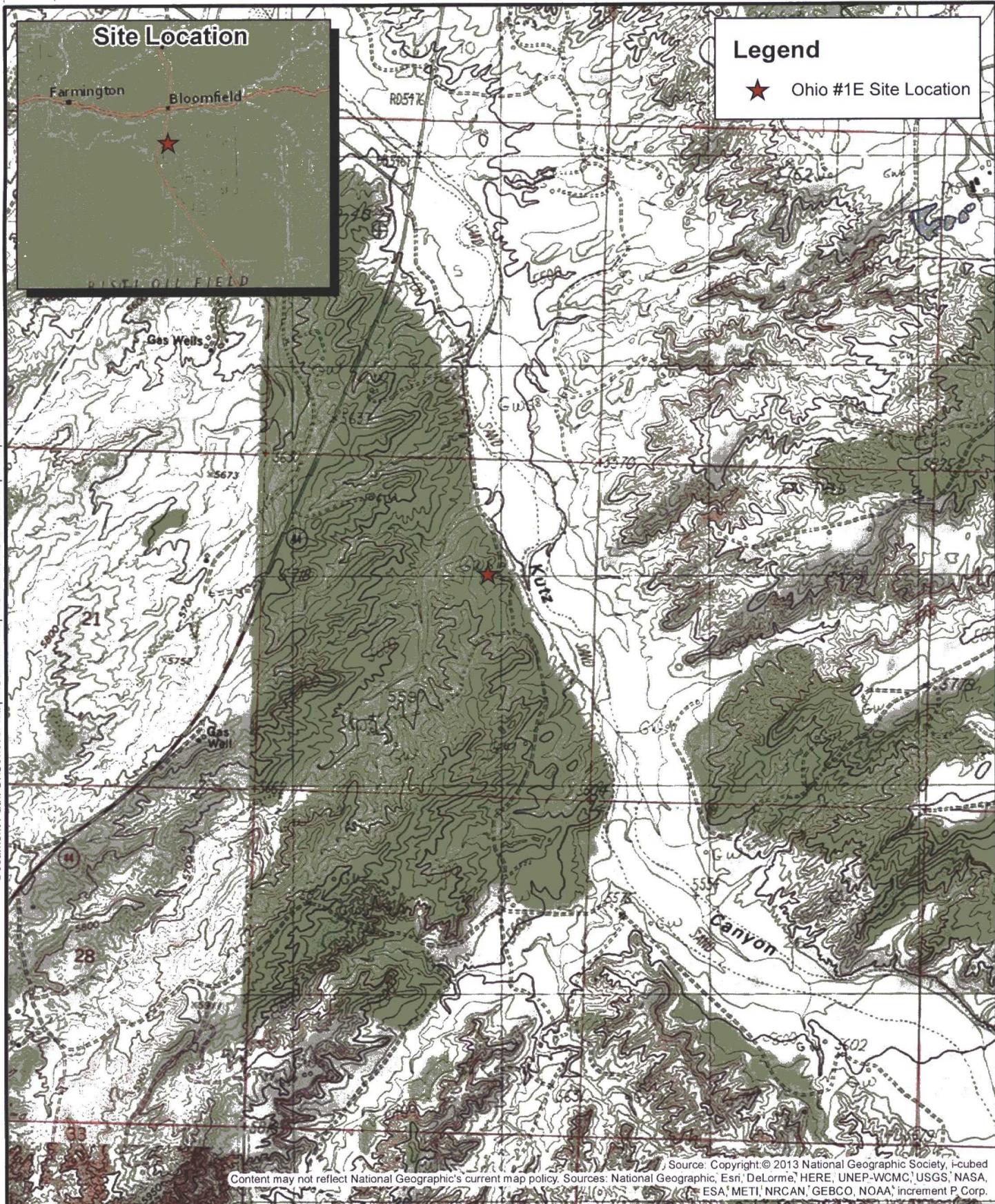
Table 1. BGT Soil Sampling Results
ConocoPhillips
Ohio #1E
San Juan County, New Mexico

Sample ID	Date	Sample Type	Sample Depth (ft below BGT liner)	Field Sampling Results			Laboratory Analytical Results					
				VOCs (PID) (ppm)	TPH - 418.1 (mg/kg)	Chloride** (mg/kg)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH - 418.1 (mg/kg)	TPH - GRO (mg/kg)	TPH - DRO (mg/kg)	Chloride*** (mg/kg)
BGT Closure Standards*				--	100	250	0.2	50	100	100		250
SC-1	12/20/16	Composite	0.5	0.0	<20	60	<0.024	<0.215	<19	<4.8	<9.7	<30

Notes: PID - photo-ionization detector
 ppm - parts per million
 mg/kg - milligrams/kilograms
 VOCs - volatile organic compounds
 *19.15.17.13 NMAC
 **Per Hach chloride low-range test kit
 ***Per USEPA Method 300.0 chlorides

BTEX - benzene, toluene, ethylbenzene, and total xylenes
 TPH - total petroleum hydrocarbons per USEPA Method 418.1
 GRO - gasoline range organics
 DRO - diesel range organics

Document Path: U:\ConocoPhillips\ConocoPhillips\Ohio #1E\Ohio #1E Topo Map.mxd

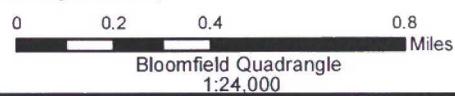


Legend

★ Ohio #1E Site Location

Source: Copyright © 2013 National Geographic Society, I-cubed
 Content may not reflect National Geographic's current map policy. Sources: National Geographic, Esri, DeLorme, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp.

Rule Engineering, LLC
 Solutions to Regulations for Industry



G-S22-T28N-R11W
 N36.65013, W107.98830
 San Juan County, NM
 API: 30-045-24406

Figure 1
Topographic Site Map
 Ohio #1E

Document Path: U:\ConocoPhillips\Ohio #1E\Ohio #1E Aerial Map.mxd

Legend

-  Wellhead Monument
-  Soil Sample Location
-  Below Grade Tank (BGT)
-  Berm
-  Above Ground Storage Tank (AST)
-  Separator

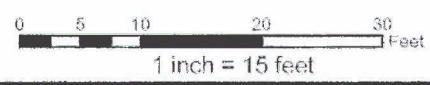


Ohio #1E Below Grade Tank
GPS: N36.65013, W107.98830

Ohio #1E Wellhead
GPS: N36.65006, W107.98808

(Source: Google Maps)

Rule Engineering, LLC
Solutions to Regulations for Industry



G-S22-T28N-R11W
N36.65013, W107.89930
San Juan County, NM
API: 30-045-24406

Figure 2
Aerial Site Map
Ohio #1E

Rule Engineering Field Work Summary Sheet

Company: ConocoPhillips
 Location: Ohio #1E
 API: 30-045-24406
 Legals: G-S22-T28N-R11W
 County: San Juan
 Land Jurisdiction: Bureau of Land Management

Date:	12/20/16
Staff:	Heather Woods

Wellhead GPS: 36.65006, -107.98808
 BGT GPS: 36.65013, -107.98830

Siting Information based on BGT Location:

Site Rank **30**

Groundwater: Estimated to be less than 50 feet below grade surface, based on elevation differential between location and local washes.

Surface Water: The wash of Kutz Canyon is located approximately 520 feet east of the location.

Wellhead Protection: No water wells identified within 1,000 feet of the location.

Objective: Closure sampling for BGT
 Tank Size: 120 barrels, removed during closure activities
 Liner: Liner present, removed during closure activities
 Observations: No staining or odor was observed in the soils below the tank.
 Notes: No NMOCD or BLM representatives were on location during sampling activities.

Field Sampling Information

Name	Type of Sample	Collection Time	Collection Location	VOCs ¹ (ppm)	VOCs time	TPH ² mg/kg	TPH Time	Chloride ³ mg/kg	Chloride Time
SC-1	Composite	9:45	See below	0.0	9:50	<20	10:20	60	10:10

SC-1 is a 5-point composite of S-1 through S-5, collected 0.5 ft below BGT.
 Sample SC-1 was laboratory analyzed for TPH (8015), BTEX (8021) and chlorides (300.0).



Field Sampling Notes:

- 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.
- ³ Field 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.



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

December 30, 2016

Heather Woods
Rule Engineering LLC
501 Airport Dr., Ste 205
Farmington, NM 87401
TEL: (505) 325-1055
FAX

RE: CoP Ohio #1E

OrderNo.: 1612B38

Dear Heather Woods:

Hall Environmental Analysis Laboratory received 1 sample(s) on 12/21/2016 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 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: Rule Engineering LLC

Client Sample ID: SC-1

Project: CoP Ohio #1E

Collection Date: 12/20/2016 9:45:00 AM

Lab ID: 1612B38-001

Matrix: SOIL

Received Date: 12/21/2016 8:00:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 418.1: TPH							
Petroleum Hydrocarbons, TR	ND	19		mg/Kg	1	12/28/2016	Analyst: MAB 29399
EPA METHOD 300.0: ANIONS							
Chloride	ND	30		mg/Kg	20	12/29/2016 1:43:16 AM	Analyst: LGT 29448
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS							
Diesel Range Organics (DRO)	ND	9.7		mg/Kg	1	12/23/2016 10:56:43 PM	Analyst: TOM 29359
Motor Oil Range Organics (MRO)	ND	48		mg/Kg	1	12/23/2016 10:56:43 PM	29359
Surr: DNOP	96.4	70-130		%Rec	1	12/23/2016 10:56:43 PM	29359
EPA METHOD 8015D: GASOLINE RANGE							
Gasoline Range Organics (GRO)	ND	4.8		mg/Kg	1	12/23/2016 9:29:34 PM	Analyst: NSB 29352
Surr: BFB	92.3	68.3-144		%Rec	1	12/23/2016 9:29:34 PM	29352
EPA METHOD 8021B: VOLATILES							
Benzene	ND	0.024		mg/Kg	1	12/23/2016 9:29:34 PM	Analyst: NSB 29352
Toluene	ND	0.048		mg/Kg	1	12/23/2016 9:29:34 PM	29352
Ethylbenzene	ND	0.048		mg/Kg	1	12/23/2016 9:29:34 PM	29352
Xylenes, Total	ND	0.095		mg/Kg	1	12/23/2016 9:29:34 PM	29352
Surr: 4-Bromofluorobenzene	101	80-120		%Rec	1	12/23/2016 9:29:34 PM	29352

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
	D	Sample Diluted Due to Matrix	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	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1612B38

30-Dec-16

Client: Rule Engineering LLC

Project: CoP Ohio #1E

Sample ID	MB-29448	SampType:	MBLK	TestCode:	EPA Method 300.0: Anions					
Client ID:	PBS	Batch ID:	29448	RunNo:	39709					
Prep Date:	12/28/2016	Analysis Date:	12/28/2016	SeqNo:	1244207	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-29448	SampType:	LCS	TestCode:	EPA Method 300.0: Anions					
Client ID:	LCSS	Batch ID:	29448	RunNo:	39709					
Prep Date:	12/28/2016	Analysis Date:	12/28/2016	SeqNo:	1244208	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	92.0	90	110			

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1612B38

30-Dec-16

Client: Rule Engineering LLC

Project: CoP Ohio #1E

Sample ID	MB-29399	SampType:	MBLK	TestCode:	EPA Method 418.1: TPH					
Client ID:	PBS	Batch ID:	29399	RunNo:	39677					
Prep Date:	12/27/2016	Analysis Date:	12/28/2016	SeqNo:	1243246	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	ND	20								

Sample ID	LCS-29399	SampType:	LCS	TestCode:	EPA Method 418.1: TPH					
Client ID:	LCSS	Batch ID:	29399	RunNo:	39677					
Prep Date:	12/27/2016	Analysis Date:	12/28/2016	SeqNo:	1243247	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	94	20	100.0	0	93.9	80.7	121			

Sample ID	LCSD-29399	SampType:	LCSD	TestCode:	EPA Method 418.1: TPH					
Client ID:	LCSS02	Batch ID:	29399	RunNo:	39677					
Prep Date:	12/27/2016	Analysis Date:	12/28/2016	SeqNo:	1243248	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	96	20	100.0	0	96.4	80.7	121	2.69	20	

Qualifiers:

- | | |
|---|---|
| * Value exceeds Maximum Contaminant Level. | B Analyte detected in the associated Method Blank |
| D Sample Diluted Due to Matrix | 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 | P Sample pH Not In Range |
| R RPD outside accepted recovery limits | RL Reporting Detection Limit |
| S % Recovery outside of range due to dilution or matrix | W Sample container temperature is out of limit as specified |

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1612B38
30-Dec-16

Client: Rule Engineering LLC
Project: CoP Ohio #1E

Sample ID	LCS-29335	SampType:	LCS	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	LCSS	Batch ID:	29335	RunNo:	39589					
Prep Date:	12/21/2016	Analysis Date:	12/23/2016	SeqNo:	1240743	Units:	%Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	4.7		5.000		93.9	70	130			

Sample ID	MB-29335	SampType:	MBLK	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	PBS	Batch ID:	29335	RunNo:	39589					
Prep Date:	12/21/2016	Analysis Date:	12/23/2016	SeqNo:	1240744	Units:	%Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	9.3		10.00		92.9	70	130			

Sample ID	1612B38-001AMS	SampType:	MS	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	SC-1	Batch ID:	29359	RunNo:	39589					
Prep Date:	12/22/2016	Analysis Date:	12/23/2016	SeqNo:	1241846	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	45	9.8	49.12	0	91.5	51.6	130			
Surr: DNOP	4.5		4.912		91.5	70	130			

Sample ID	1612B38-001AMSD	SampType:	MSD	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	SC-1	Batch ID:	29359	RunNo:	39589					
Prep Date:	12/22/2016	Analysis Date:	12/23/2016	SeqNo:	1241847	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	46	9.8	49.16	0	93.3	51.6	130	1.98	20	
Surr: DNOP	4.5		4.916		91.2	70	130	0	0	

Sample ID	LCS-29359	SampType:	LCS	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	LCSS	Batch ID:	29359	RunNo:	39589					
Prep Date:	12/22/2016	Analysis Date:	12/23/2016	SeqNo:	1241856	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	44	10	50.00	0	88.3	63.8	116			
Surr: DNOP	4.3		5.000		86.0	70	130			

Sample ID	MB-29359	SampType:	MBLK	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	PBS	Batch ID:	29359	RunNo:	39589					
Prep Date:	12/22/2016	Analysis Date:	12/23/2016	SeqNo:	1241857	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Motor Oil Range Organics (MRO)	ND	50								

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1612B38

30-Dec-16

Client: Rule Engineering LLC

Project: CoP Ohio #1E

Sample ID	MB-29359	SampType:	MBLK	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	PBS	Batch ID:	29359	RunNo:	39589					
Prep Date:	12/22/2016	Analysis Date:	12/23/2016	SeqNo:	1241857	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	9.4		10.00		94.4	70	130			

Sample ID	LCS-29384	SampType:	LCS	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	LCSS	Batch ID:	29384	RunNo:	39672					
Prep Date:	12/23/2016	Analysis Date:	12/28/2016	SeqNo:	1243438	Units:	%Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	4.1		5.000		82.6	70	130			

Sample ID	MB-29384	SampType:	MBLK	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	PBS	Batch ID:	29384	RunNo:	39672					
Prep Date:	12/23/2016	Analysis Date:	12/28/2016	SeqNo:	1243440	Units:	%Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	8.7		10.00		86.6	70	130			

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1612B38

30-Dec-16

Client: Rule Engineering LLC

Project: CoP Ohio #1E

Sample ID	MB-29352	SampType:	MBLK	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	PBS	Batch ID:	29352	RunNo:	39645					
Prep Date:	12/22/2016	Analysis Date:	12/23/2016	SeqNo:	1241888	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	930		1000		92.5	68.3	144			

Sample ID	LCS-29352	SampType:	LCS	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	LCSS	Batch ID:	29352	RunNo:	39645					
Prep Date:	12/22/2016	Analysis Date:	12/23/2016	SeqNo:	1241889	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	26	5.0	25.00	0	106	74.6	123			
Surr: BFB	1000		1000		101	68.3	144			

Sample ID	MB-29391	SampType:	MBLK	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	PBS	Batch ID:	29391	RunNo:	39665					
Prep Date:	12/23/2016	Analysis Date:	12/27/2016	SeqNo:	1242742	Units:	%Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: BFB	950		1000		94.8	68.3	144			

Sample ID	LCS-29391	SampType:	LCS	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	LCSS	Batch ID:	29391	RunNo:	39665					
Prep Date:	12/23/2016	Analysis Date:	12/27/2016	SeqNo:	1242743	Units:	%Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: BFB	1000		1000		99.6	68.3	144			

Sample ID	MB-29392	SampType:	MBLK	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	PBS	Batch ID:	29392	RunNo:	39665					
Prep Date:	12/23/2016	Analysis Date:	12/27/2016	SeqNo:	1242756	Units:	%Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: BFB	980		1000		98.3	68.3	144			

Sample ID	LCS-29392	SampType:	LCS	TestCode:	EPA Method 8015D: Gasoline Range					
Client ID:	LCSS	Batch ID:	29392	RunNo:	39665					
Prep Date:	12/23/2016	Analysis Date:	12/27/2016	SeqNo:	1242758	Units:	%Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: BFB	1100		1000		106	68.3	144			

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1612B38
30-Dec-16

Client: Rule Engineering LLC
Project: CoP Ohio #1E

Sample ID	MB-29352	SampType:	MBLK	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	PBS	Batch ID:	29352	RunNo:	39645					
Prep Date:	12/22/2016	Analysis Date:	12/23/2016	SeqNo:	1241930	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.025								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.0		1.000		103	80	120			

Sample ID	LCS-29352	SampType:	LCS	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	LCSS	Batch ID:	29352	RunNo:	39645					
Prep Date:	12/22/2016	Analysis Date:	12/23/2016	SeqNo:	1241931	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.1	0.025	1.000	0	108	75.2	115			
Toluene	1.0	0.050	1.000	0	102	80.7	112			
Ethylbenzene	0.98	0.050	1.000	0	98.3	78.9	117			
Xylenes, Total	3.0	0.10	3.000	0	98.6	79.2	115			
Surr: 4-Bromofluorobenzene	1.1		1.000		110	80	120			

Sample ID	1612B38-001AMS	SampType:	MS	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	SC-1	Batch ID:	29352	RunNo:	39645					
Prep Date:	12/22/2016	Analysis Date:	12/23/2016	SeqNo:	1241933	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.2	0.025	0.9921	0	120	61.5	138			
Toluene	1.1	0.050	0.9921	0	114	71.4	127			
Ethylbenzene	1.1	0.050	0.9921	0	110	70.9	132			
Xylenes, Total	3.3	0.099	2.976	0	112	76.2	123			
Surr: 4-Bromofluorobenzene	1.1		0.9921		107	80	120			

Sample ID	1612B38-001AMSD	SampType:	MSD	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	SC-1	Batch ID:	29352	RunNo:	39645					
Prep Date:	12/22/2016	Analysis Date:	12/23/2016	SeqNo:	1241934	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.1	0.023	0.9217	0	117	61.5	138	9.80	20	
Toluene	1.0	0.046	0.9217	0	111	71.4	127	9.81	20	
Ethylbenzene	1.0	0.046	0.9217	0	108	70.9	132	9.35	20	
Xylenes, Total	3.0	0.092	2.765	0	109	76.2	123	9.93	20	
Surr: 4-Bromofluorobenzene	1.0		0.9217		108	80	120	0	0	

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
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- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

QC SUMMARY REPORT
Hall Environmental Analysis Laboratory, Inc.

WO#: 1612B38
 30-Dec-16

Client: Rule Engineering LLC
Project: CoP Ohio #1E

Sample ID MB-29391	SampType: MBLK		TestCode: EPA Method 8021B: Volatiles							
Client ID: PBS	Batch ID: 29391		RunNo: 39665							
Prep Date: 12/23/2016	Analysis Date: 12/27/2016		SeqNo: 1242788		Units: %Rec					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: 4-Bromofluorobenzene	1.1		1.000		109	80	120			

Sample ID LCS-29391	SampType: LCS		TestCode: EPA Method 8021B: Volatiles							
Client ID: LCSS	Batch ID: 29391		RunNo: 39665							
Prep Date: 12/23/2016	Analysis Date: 12/27/2016		SeqNo: 1242789		Units: %Rec					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: 4-Bromofluorobenzene	1.1		1.000		110	80	120			

Qualifiers:

- | | |
|---|---|
| * Value exceeds Maximum Contaminant Level. | B Analyte detected in the associated Method Blank |
| D Sample Diluted Due to Matrix | 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 | P Sample pH Not In Range |
| R RPD outside accepted recovery limits | RL Reporting Detection Limit |
| S % Recovery outside of range due to dilution or matrix | W Sample container temperature is out of limit as specified |



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

Sample Log-In Check List

Client Name: RULE ENGINEERING LL

Work Order Number: 1612B38

RcptNo: 1

Received by/date: HTJ 12/21/16

Logged By: Anne Thorne 12/21/16 0800
~~12/26/2016 2:07:00 PM~~

Completed By: Anne Thorne 12/21/2016 1:33:59 PM 12/22/16

Reviewed By: ATJ 12/22/16

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			

Chain-of-Custody Record

Client: Rule Engineering, LLC

Mailing Address: 501 Airport Dr, Suite 205
Farmington, NM 87401

Phone #: (505) 716-2787

email or Fax#: hwoods@ruleengineering.com

QA/QC Package:
 Standard Level 4 (Full Validation)

Accreditation
 NELAP Other _____

EDD (Type) _____

Turn-Around Time:

Standard Rush

Project Name:

Cop Ohio #1E

Project #:

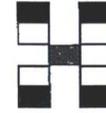
Project Manager:

H. Woods

Sampler: H. Woods

On Ice: Yes No

Sample Temperature: 1.0°C



HALL ENVIRONMENTAL ANALYSIS LABORATORY

www.hallenvironmental.com

4901 Hawkins NE - Albuquerque, NM 87109

Tel. 505-345-3975 Fax 505-345-4107

Analysis Request

Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No.	BTEX + MTBE + TMBE (8021)	BTEX + MTBE + TPH (Gas only)	TPH 8015B (GRO / DRO / MRO)	TPH (Method 418.1)	EDB (Method 504.1)	PAH's (8310 or 8270 SIMS)	RCRA 8 Metals	Anions (F, Cl, NO ₃ , NO ₂ , PO ₄ , SO ₄)	8081 Pesticides / 8082 PCB's	8260B (VOA)	8270 (Semi-VOA)	Air Bubbles (Y or N)	
12/20/16	0945	Soil	SC-1	(1) 4 oz Glass	Cold	KA2-B38	X	X	X				X						
AKFS HW																			

Date: 12/20/16 Time: 1721 Relinquished by: Heath M. Wood

Received by: Christa Wells Date: 12/20/16 Time: 1721

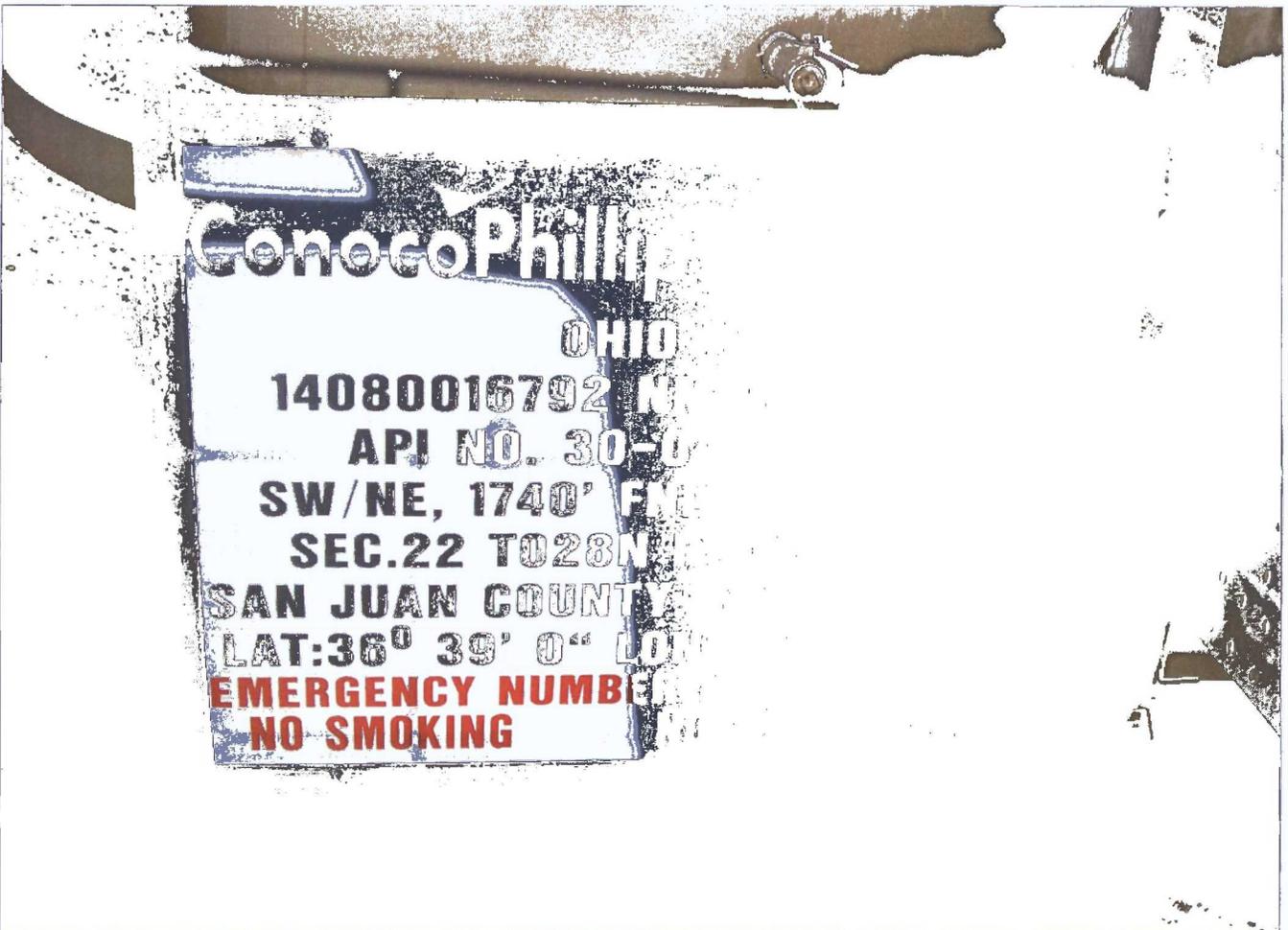
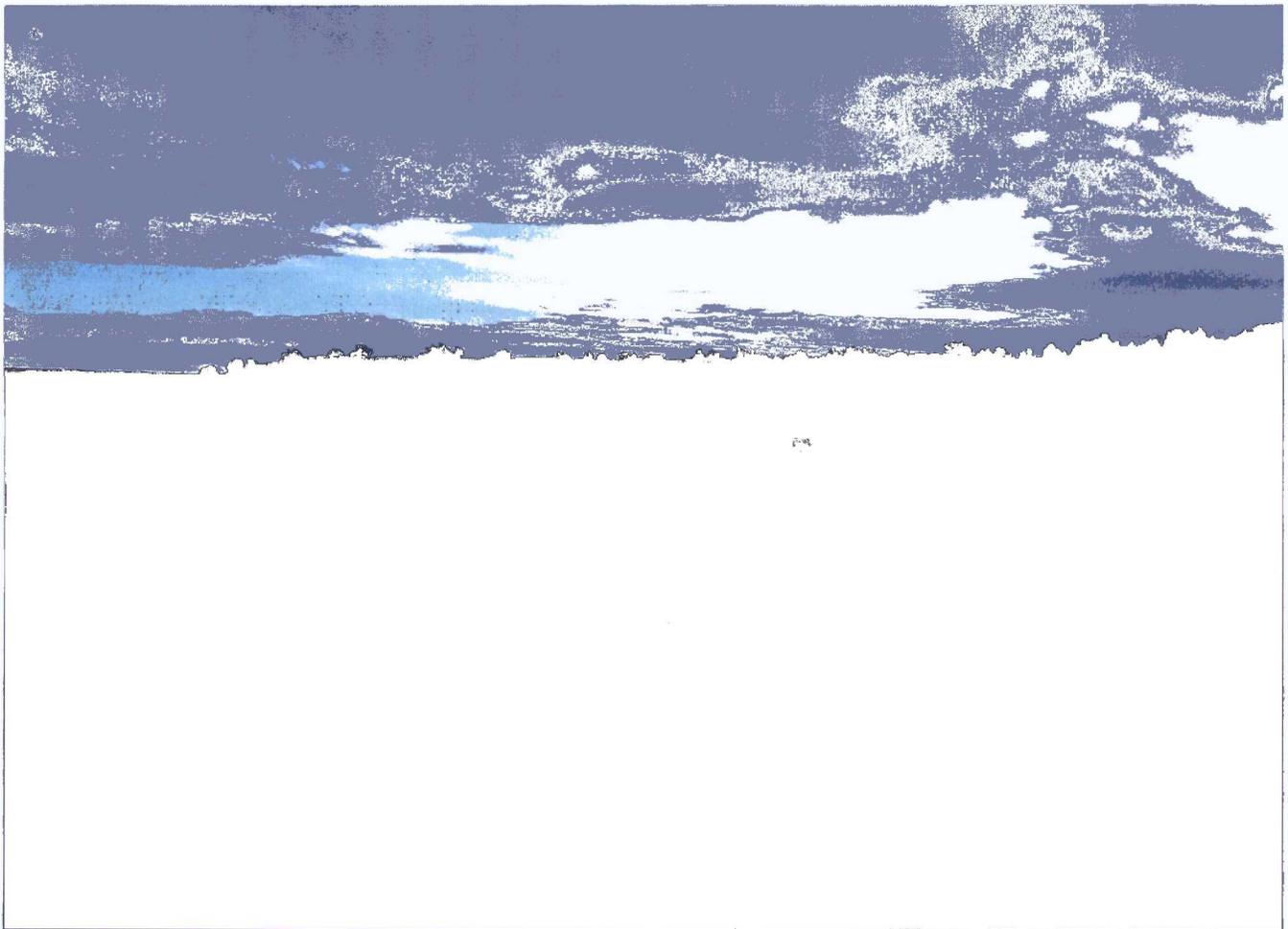
Remarks: Direct bill to ConocoPhillips

Date: 12/20/16 Time: 1824 Relinquished by: Christa Wells

Received by: [Signature] Date: 12/21/16 Time: 0800

WO: 10390387 User: KGARCIA Area: 2 Ordered by: Bobby Spearman

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.



ConocoPhillips

OHIO

14080016792 N

API NO. 30-0

SW/NE, 1740' FE

SEC. 22 TO 28 N

SAN JUAN COUNTY

LAT: 36° 39' 0" LON: ...

EMERGENCY NUMBER

NO SMOKING