

Page 1 of 24

DAVID FEATHER ENVIRONMENTAL SUPERVISOR DIRECT: (432) 818-1615 E-MAIL: DAVID.FEATHER @ APACHECORP.COM

November 1, 2019

Mr. Bradford Billings State of New Mexico Oil Conservation Division 1220 South St Francis Drive Santa Fe, NM 87505

RE: 1RP-2402 WBDU 11

Mr. Billings,

In compliance with 19.15.29.15(B) NMAC and the agreement submitted by Apache Corporation on November 8, 2018, Apache Corporation is submitting information related to closure for the release occurring January 22, 2010. Apache is respectfully submitting the closure report based on remediation and studies occurring in 2010 that demonstrate the site meeting the requirements of the agency. Unless further information is requested by NMOCD, Apache Corporation considers this release closed.

If there are any questions, please feel free to contact me by telephone at 432-818-1615 or by e-mail at David.Feather@ApacheCorp.com.

Sincerely,

David Feather Environmental Supervisor Apache Corporation - Permian Basin Region

Attachment: Closure Report Dated April 28, 2009

Received by OCD: 11/1/2019 8:56:38 AM Received by OCD: 11/1/2019 8:58:37 AM

APACHE CORPORATION – PERMIAN BASIN REGION – 303 VETERANS AIRPARK LANE, STE 3000, MIDLAND, TEXAS 79705

WBDU # 11 (Located in UL-O SECTION 4, T21S, R37E of Lea County, NM) (GPS Reading of 32°-30'-09.0"-N & 103°-09'-57.3"-W) API # 30-025-20069

Spill Remediation Report

Presented to:

Apache Corp 612 Yale, Suite 1500

Tulsa, OK 74136

Prepared by:

Phoenix Environmental, LLC. P.O. Box 1856 Hobbs, New Mexico 88240



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IMPORTANT NOTICE:

Phoenix Environmental, LLC. With offices at 2113 French Drive, Hobbs, New Mexico 88241 (the Company), has prepared this project report for remediation of WBDU #11, to the best of its ability. No warranty, expressed or implied, is made or intended. The report was prepared for Apache Corp., with offices at 612 S Yale Suite 1500. Tulsa OK. 74136 and (the Client). All information disclosed in this plan is for internal purposes only and is considered confidential. By accepting this document, the recipient agrees to keep confidential the information contained herein. The recipient further agrees not to copy, reproduce or distribute to any third party this project plan in whole or in part, without express written permission from the Company or Client.





Project Overview

Phoenix Environmental, LLC. (Phoenix) was contracted by Natalie Gladden with Apache Corp. to consult and oversee the clean up on the WBDU # 11 owned by Apache Corp. and is located at UL O, Sec 4, T21S, R37E of Lea County New Mexico with a GPS Reading: $32^{\circ}-30'-09.0''N \& 103^{\circ}-09'-57.0''W$ with an elevation of 3474 above sea level. The land, in and around the site, is primarily used as pasture for cattle and the production of oil and gas.

The potential contaminates of concern were mid- to high-level concentrations of produce water containing elevated chlorides that were lost due to a leak in the injection line.

The ground water depth data available from the State of New Mexico Engineers' office showed the vertical depth to the top of water to be about 30 feet below surface.

Pursuant to the NMOCD guidelines for clean up of unlined surface impoundments, the clean up level for this site will be at <100 ppm for TPH (Total Petroleum Hydrocarbons) and <50 ppm for BTEX (Benzene, Toluene, Ethylbenzene, and Xylene). The NMOCD has also asked for CL (Chlorides) be returned back as close to background levels as possible or <250 ppm.

Findings and Conclusion

The spill was due to a leak in the injection line. A total of 10 bbls of produce water was lost with 5 bbls being recovered; leaving 5 bbls that was absorbed by the near surface soils. A 70'x 30' area was affected by the leak.

The bottom of the excavation (approximately 4 feet) was tested for TPH & Chlorides to make certain that the target limits had been met prior to backfilling and compaction for closure. The site cleaned up very well, and did not impact groundwater.

The spill site should pose very little if any future environmental threat due to the fact that all of the impacted soils were taken off site for disposal at Sundance Services (Permit # R6940) the site was then backfilled and compacted with clean backfill and contoured back to grade to prevent ponding on the area.

The well at the spill site was also plugged and once the spill clean up was completed the location was rehabbed. The caliche was removed from the surface and fresh top soil was pulled back over the location and was then reseeded with RS Warm Season grass.



Chronology of Operations

- January 25, 2010 Phoenix mobilized on-site. The first order on the agenda was a tailgate safety meeting to review any potential safety concerns of the site and to cover the clean- up operations. (Please note that a daily safety meeting is the first order of the day before any work begins on site). New Mexico One Call was notified of the intent to finish the spill remediation. There was an estimated 100 cyds of impacted soils that was stockpiled on location from the spill. This material was loaded and transported to Sundance Services (Permit # R6940) for off site disposal. There were two loads taken out on this date or 40 cyds.
- 2. January 26, 2010 Crew began excavating spill area around well head. Excavated impacted soil were loaded and transported to Sundance for off site disposal with a total of three loads or 60 cyds. Daniel Schindler with Phoenix took bottom samples to check CL levels. These samples were split and sent to a third party lab for final analysis. (Please refer to pages 8 and 9 of this report.)
- 3. January 27, 2010 Crew finished hauling last two loads of impacted soils off site for disposal. The excavation was backfilled with clean soil from the site. The caliche was removed from the location and started pulling clean top soil over the top of the site.
- 4. February 1, 2010– Crew finished pulling top soil over the location. The site was then reseeded with RS Warm Season grass.



Limitations

Phoenix Environmental LLC has prepared this report to the best of its ability. No other warranty expressed, implied or intended is made.

This report has been prepared for Apache Corp. our client. The information contained in this report including all exhibits and attachments, may not be used by any other party without the express consent from Phoenix Environmental LLC and/or the client.

Certification

The following Phoenix Environmental LLC personnel have reviewed this report and verify that to the best of their knowledge the contents are true and correct.

Name: Allen Hodge, REM # 7096 Signature:

Title: VP Operations Phoenix Environmental LLC www.phoenix-env.us





SECTION II

Page 4 of 14



SUMMARY SOIL ANALYSIS REPORT

Client: Apache Corp. Supervisor: Allen Hodge Sample Matrix: Soil Facility: WBDU # 11 WInj Order No.: Natalie Gladden Samples Received: Intact on site

On-Site Project Screening

							Test Method
Sample	Date	Depth	Chlorides	ТРН	BTEX	BTEX Location	
#1	1-25-10	3'	650			South end	
#2	1-25-10	2'	400			Dry hole marker	EPA 325.3
#3	<u>1-25-10</u>	0-6″	375			West surface	EPA 325.3
#4	1-25-10	1'	425			North end	EPA 325.3
#5							EPA 325.3
#6							EPA 325.3

Samples reported in parts per million (ppm) and depth is in feet (*) and inches (*)

Interim Project Screening

			PID	PID		Test
Date	Depth	Chlorides	<u></u>	BTEX	Location	Method
1-26-10	4'	125		South end		EPA 325.3
1-26-10	- 3'	100			Dry hole marker	EPA 325.3
1-26-10	1'	60			West surface	EPA 325.3
1-26-10	3'	175			North end	EPA 325.3
1-26-10	0-6″	<50			Background	EPA 325.3
			-			
	ĺ			[ų.
						55.
	Date 1-26-10 1-26-10 1-26-10 1-26-10	Date Depth 1-26-10 4' 1-26-10 3' 1-26-10 1' 1-26-10 3'	1-26-10 4' 125 1-26-10 3' 100 1-26-10 1' 60 1-26-10 3' 175	Date Depth Chlorides PID 1-26-10 4' 125 125 1-26-10 3' 100 100 1-26-10 1' 60 1125 1-26-10 3' 175 1125	Date Depth Chlorides PID PID 1-26-10 4' 125 1-26-10 3' 100 1-26-10 3' 100 1-26-10 3' 100 <td>DateDepthChloridesPIDPID1-26-104'125BTEXLocation1-26-103'100Ory hole marker1-26-101'60West surface1-26-103'175North end</td>	DateDepthChloridesPIDPID1-26-104'125BTEXLocation1-26-103'100Ory hole marker1-26-101'60West surface1-26-103'175North end

Samples reported in parts per million (ppm) and depth is in feet (') and inches (")

Final (Third Party Laboratory) Project Screening Verification

							Test
Sample	Date	Depth	Chlorides	ТРН	BTEX	Location	Method
#1	1-27-10	4'	112	75.2		Test area 1 south bottom	See Report
#2	1-27-10	3'	160	57.2		Test area 2 north bottom	See Report
#3	1-27-10	1'	<16	<10		Test area 3 middle west bottom	See Report
#4	1-27-10	0-6"	<16	<10		Test 4 Background	See Report
#5							
#6					2		
#7		1					<u> </u>

Samples reported in parts per million (ppm) and depth is in feet (') and inches (*)

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Phoenix Environmental, LLC. P.O. Box 1856 – 2113 French Drive Hobbs, New Mexico 88241 505.391.9685 – FAX: 505.391.9687

SOIL ANALYSIS REPORT

Date: 1-25-2010 Client: Apache Corp. Supervisor: Allen Hodge Sample Matrix: Soil Facility: WBDU # 11 Winj Test Method: EPA 325.3 Order No.: Natalie Gladden Sample Received: Intact on site

<u>Sample</u>	<u>Cl (ppm)</u>	<u>Depth (feet)</u>	Location
#1	650	3'	South end at Inj. line
#2	400	2'	Dry hole marker
#3	375	0-6″	West surface
#4	425	1'	North end
#5			
#6			
#7			
#8			
#9			
#10			

COMMENTS: Samples do not meet limits for NMOCD guidelines for leak and spill clean up.

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Phoenix Environmental, LLC. P.O. Box 1856 – 2113 French Drive Hobbs, New Mexico 88241 505.391.9685 – FAX: 505.391.9687

SOIL ANALYSIS REPORT

Date: 1-26-2010 Client: Apache Corp. Supervisor: Allen Hodge Sample Matrix: Soil Facility: WBDU # 11 Winj Test Method: EPA 325.3 Order No.: Natalie Gladden Sample Received: Intact on site

<u>Sample</u>	<u>Cl (ppm)</u>	Depth (feet)	Location
#1	125	4'	South end at Inj. line
#2	100	3'	Dry hole marker
#3	60	1'	West surface
#4	175	31	North end
#5	<50	0-6″	Background
#6			
#7			
#8	20		
#9			
#10			

COMMENTS: Samples meet limits for NMOCD guidelines for leak and spill clean up. Samples will also be split and sent to a third party lab for final analysis.

Released to Imaging: 6/22/2022 10:17:48 AM



PHONE (575) 393-2326 + 101 E MARLAND + HOBBS NM 68240

February 9, 2010

Daniel Schindler Phoenix Environmental 2113 French Dr. Hobbs, NM 88240

Re: Apache (30-025-20069)

Enclosed are the results of analyses for sample number H19218, received by the laboratory on 02/04/10 at 5:10 pm.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021 Method SW-846 8260 Method TX 1005 Benzene, Toluene, Ethyl Benzene, and Total Xylenes Benzene, Toluene, Ethyl Benzene, and Total Xylenes Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Cardinal Laboratories is accredited though the State of Colorado Department of Public Health and Environment for:

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

Accreditation applies to public drinking water matrices.

Total Number of Pages of Report: 3 (includes Chain of Custody)

Sincerely.

Celey D Recne Laboratory Director

This report conforms with NELAP requirements.

Released to Imaging: 6/22/2022 10:17:48 AM



PHONE (575) 393-2326 + 101 E. WARLAND + HOBBS, NM 85240

ANALYTICAL RESULTS FOR PHOENIX ENVIRONMENTAL ATTN: DANIEL SCHINDLER 2113 FRENCH DR. HOBBS, NM 88240 FAX TO: (575) 391-9687

Receiving Date: 02/04/10 Reporting Date: 02/08/10 Project Owner: APACHE (30-025-20069) Project Name WBDU #11 W FNJ Project Location: UL-O SEC 4 T21S R37E

Sampling Date: 01/27/10 Sample Type: SOIL Sample Condition: INTACT @ 24°C Sample Received By JH Analyzed By: AB/HM

	GRO	DRO	
	(C6-C10)	(>C ₁₀ -C ₂₈)	Ci
LAB NUMBER SAMPLE ID	(mg/kg)	(mg/kg)	(mg/kg)
ANIAL VOIC DATE	00/06/40	02/06/101	00/05/11

ANALYSIS DATE	02/06/10	02/06/10	02/05/10
H19218-1 #1 @ 4'	<10.0	75.2	112
H19218-2 #2 @ 3'	<10.0	57.2	160
H19213-3 #3 @ 1'	<10.0	<10.0	< 18
H19218-4** #4 BACKGROUND @ 6"	<10.0	<10.0	< 16
Quality Control	546	528	510
True Value QC	500	500	500
% Recovery	109	106	102
Relative Percent Difference	13 3	1.3	2.0

METHODS; TPH GRO & DRO: EPA SW-846 8015 M; CI'; Std. Methods 4500-CI B "Analyses performed on 114 wiv aqueous extracts. Reported on wet weight

"Second surrogate outside historical limits due to matrix interference.

Directo

02/09/10

H19218 TCL PHOENIX



Released to Imaging: 6/22/2022 10:17:48 AM

FAGE 03/06



SECTION III













Photo # 1 Name of site or location



Photo # 3 Stockpile impacted soils at start of clean up



Photo # 2 Spill site at start of clean up



Photo # 4 Loading of impacted soils for off site disposal





Photo # 5 Spill site after removal of impacted soils



Photo # 7 Site after top soil placement



Photo # 6 Pulling top soil over site before reseeding



Photo # 8 Site after reseeding

District 1 1625 N. French Dr., Hobbs, NM 88240 District II 1301 W. Grand Avenue, Artesia, NM 88210 District III 1000 Rio Brazos Road, Aztec, NM 87410 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505

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State of New Mexico Energy Minerals and Natural Resources

Form C-141 Revised October 10, 2003

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 SENDEMIL 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

						<u>, , , , , , , , , , , , , , , , , , , </u>	02		50 <i>111</i>		
	Release Notification and Corrective Action										
						OPERATOR Initial Report					Final Report
Name of Co	mpany A	pache Corp	oration			Contact N	atalie Gladden				
Address P.	O. Box 18	49 Eunice, 1	NM 8823	1	-	Telephone 1	No. 575-390-41	86			
Facility Nar	ne WBDU	#11				Facility Typ	e Injection wel	1			
Surface Ow	ner Deck	Estate		Mineral C	Owner	State of NM		Lease N	lo. 30-025-	20069	9
				LOCA	ATIO	N OF RE	LEASE				
Unit Letter	Section	Township	Range	Feet from the	North	/South Line	Feet from the	East/West Line	County		
0	4	215	37E	660'	FSL		1980'	FEL	Lea		
<u> </u>	<u> </u>	· · · · ·	La	titude		Longitud	le	•	· .		
						OF REL					
Type of Rele	ase Produ	ced Water		1141	UNE		Release 10bbls	Volume F	Recovered 5	ibbls	
Source of Re						Date 1/22			2/10 515pm		
Was Immedi						IFYES, To	Whom?				
			Yes 🗵	No 🗌 Not R	cquired						
By Whom?							Iour 01/25/10 83				
Was a Water	course Read			-		IFYES, V	olume Impacting (the Watercourse.			
		L	Yes 🗵	0 No							26
If a Watercon	urse was Im	pacted, Descr	ibe Fully.	•							
Describe Cau	use of Probl	em and Reme	dial Actio	n Taken.*							
					ine was	repaired, vac	uum truck recove	red standing fluid a	und saturated	l soil w	vas scrapped
from the surf	ace until or	ic-call could t	e cleared.			-		-			
Describe Are	a Affected	and Cleanup	Action Tal	ken.•							
					l. The p	lugging depa	rtment will be reci	laiming this locatio	n and will fi	inalize	the clean-up.
I hereby cert	ify that the	information g	iven abov	e is true and com	olete to	the best of my	knowledge and u	understand that pur	suant to NM	OCD I	rules and
regulations a	ll operators	are required (o report a	nd/or file certain	release i	notifications a	nd perform correc	ctive actions for rel	cases which	may e	ndunger
								leport" does not rel reat to ground wate			
or the enviro	nment In a	addition NM(DCD acces	plance of a C-141	mood	te comamma foes not reliev	ton the operator of	responsibility for c	r, suriace w	ater, ni vith an	unian neartí
		ws and/or reg			report		e me operator of	responsionity for e	ompriance v	***** GUT	
	\wedge	- 0					OIL CON	SERVATION	DIVISIO	DN	
Signatures 1	hb	luch-		1 - C - c							
Signature:		un -	<u>+ 100</u>	Miles		A					
Printed Nam	e: Natalic (Gladden				Approved by	District Supervis	;or:			
Title: EH&S	S Environme	ental Tech				Approval Da	te:	Expiration	Date:		
											87.
E-mail Addr	ess: natalie	.gladden@apa	achecorp.c	:om		Conditions o	r Approval:		Atlached		É.
	5/10			75-390-4186							0.17.48
* Attach Addi	tional She	ets If Necess	багу								000

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

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State of New Mexico Energy Minerals and Natural Resources

SENT

Form C-141 Revised October 10, 2003

1000 Rio Brazos Road, Azlec, NM 87410 1220 <u>District IV</u> 1220 1220 S. SL Francis Dr., Santa Fc, NM 87505 Sa	Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505			Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form	
Release Notific	cation	and Co	orrective A	ction	
		OPERA	ror	🔲 Initia	al Report 🛛 🔀 Final Report
Name of Company Apache Corporation			atalie Gladden		
Address P.O. Box 1849 Eunice, NM 88231		Telephone 1	No. 575-390-41	86	· · · · · · · · · · · · · · · · · · ·
Facility Name WBDU #11			e Injection wel		
Surface Owner Deck Estate Mineral O)wner S	State of NM	-	Lease 1	No. 30-025-20069
LOC		N OF REI	LEASE		
Unit Letter Section Township Range Feet from the		South Line	Feet from the	East/West Line	County
O 4 21S 37E 660'	FSL		1980	FEL	Lea
Latitude		Longitud	le		
NAT	URE	OF REL	EASE		
Type of Release Produced Water		Volume of Release 10bbis Volume Recovered 5bbis			Recovered Sbbis
Source of Release Injection line		Date 1/22		Date 01/22/10 515pm	
Was Immediate Notice Given?		If YES, To	Whom?		
🗋 Yes 🛛 No 🗌 Not R	equired	1			
By Whom? Natalic Gladden	Date and Hour 01/25/10 835am				
Was a Watercourse Reached?		If YES, Volume Impacting the Watercourse.			
🗌 Yes 🖾 No					
If a Watercourse was Impacted, Describe Fully.*		t			
Describe Cause of Problem and Remedial Action Taken.* Injection line leak going to recently plugged well (WBDU #11), 1 from the surface until one-call could be cleared.	line was i	repaired, vac	uum truck recove	red standing fluid a	und saturated soil was scrapped
Describe Area Affected and Cleanup Action Taken.* Saturated soil will be excavated and hauled to Sundance Disposal	i. The pl	ugging depar	tment will be rec	laiming this locatio	m and will finalize the clean-up.
Phoenix Environmental completed the remediation procedures.	Closure R	Ceport attache	:d.		
1 hereby certify that the information given above is true and comp regulations all operators are required to report and/or file certain a public health or the environment. The acceptance of a C-141 rep should their operations have failed to adequately investigate and to or the environment. In addition, NMOCD acceptance of a C-141 federal, state, or local laws and/or regulations.	release ne ort by the remediate	otifications a c NMOCD m c contaminati	nd perform correct arked as "Final R ion that pose a the	ctive actions for rel teport" does not rel real to ground wate	eases which may endanger ieve the operator of liability r, surface water, human health
Signature: Jaspilie Gabden		OIL CONSERVATION DIVISION			DIVISION
Printed Name: Natalie Gladden		Approved by	District Supervis	ior:	
Title: Ell&S Environmental Tech		Approval Da	le:	Expiration	Date:
E-mail Address: natalic.gladdcn@apachecorp.com		Conditions o	EApproval:		Attached
Date: 04/28/2010 Phone: 575-390-4186					Attached
Attach Additional Sheets If Necessary					

Form C-141 Page 6

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State of New Mexico Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: Each of the following ite	ems must be included in the closure report.
A scaled site and sampling diagram as described in 19.15.29.11	1 NMAC
Photographs of the remediated site prior to backfill or photos of must be notified 2 days prior to liner inspection)	of the liner integrity if applicable (Note: appropriate OCD District office
Laboratory analyses of final sampling (Note: appropriate ODC	District office must be notified 2 days prior to final sampling)
Description of remediation activities	
	te to the best of my knowledge and understand that pursuant to OCD rules
may endanger public health or the environment. The acceptance of a should their operations have failed to adequately investigate and rem human health or the environment. In addition, OCD acceptance of a compliance with any other federal, state, or local laws and/or regulat restore, reclaim, and re-vegetate the impacted surface area to the con accordance with 19.15.29.13 NMAC including notification to the OC Printed Name:	Title: Environmental Tech. SR,
signature: Bruce Bahy email: Larry. baker@apachecorp.com	Date: $11 - 1 - 19$
email: larry, baker @asschecore.com	Telephone: 432 - 631 - 6982
OCD Only	
Received by:	Date:
Closure approval by the OCD does not relieve the responsible party or remediate contamination that poses a threat to groundwater, surface w party of compliance with any other federal, state, or local laws and/or	of liability should their operations have failed to adequately investigate and water, human health, or the environment nor does not relieve the responsible or regulations.
Closure Approved by: Bradford Billings	Date: 06/22/2022
Printed Name: Bradford Billings	Title:Envi. Spec.A
	Date:Envi. Spec.A

Received by OCD: 11/1/2019 8:58:37 AM

District I 1625 N. French Dr., Hobbs, NM 88240 Phone:(575) 393-6161 Fax:(575) 393-0720 District II

811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

District III

1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

District IV 1220 S. St Francis Dr., Santa Fe, NM 87505 Phone: (505) 476-3470 Fax: (505) 476-3462

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

CONDITIONS

Operator:	OGRID:
APACHE CORPORATION	873
303 Veterans Airpark Ln	Action Number:
Midland, TX 79705	2199
	Action Type:
	[C-141] Release Corrective Action (C-141)

CONDITIONS

Created By		Condition Date
bbillings	None	6/22/2022

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Action 2199