Received by OCD: 7/8/2020 10:19:04 AM



P.O. Box 1708 • Artesia, NM 88211 www.hrlcomp.com

June 4, 2020

Mr. Tom Bynum Devon Energy 6488 Seven Rivers Highway Artesia, New Mexico 88211 Email: tom.bynum@dvn.com

Subject: Site Characterization and Closure Report Cotton Draw Unit 172H (May 2016) 2RP-3683 Eddy County, New Mexico

Dear Mr. Bynum:

HRL Compliance Solutions, Inc. (HRL) is pleased to submit this site characterization and closure report for the May 6, 2016 release at the Cotton Draw Unit 172H (Site). The release was at latitude 32.151932353 and longitude -103.726815365 in Eddy County, New Mexico (Figure 1) (Attachment A, Photographs).

Site Background

On May 6, 2016, a release of 20 barrels (bbls) of produced water was observed at the Site. The release was due to equipment failure when a gasket blew out on the main water line between the valve and the pipe. The valves on each side of the line were immediately shut so the line could be bypassed and stop the flow of water. The produced water was released in the right-of-way, in a 75-foot square area south of the well pad. None of the produced water was recovered.

Because the volume released was between five bbls and 25 bbls; this is considered a minor release according to the New Mexico Oil Conservation Division (NMOCD). On May 9, 2016, Devon reported the release to the NMOCD on a Release Notification and Corrective Action Form (Form C-141) (Attachment B). The release was assigned Remediation Permit (RP) number 2RP-3683.

Scope of Work

Devon has requested HRL to provide the following deliverables:

- Research the information as specified in the Site Characterization on the New Mexico Oil and Conservation Division (NMOCD) Form C-141
- Prepare a map with sample points labeled
- Prepare a table summarizing the results obtained during the site characterization activities
- Prepare a site characterization report including a remediation plan per NMOCD closure requirements and related cost estimates

INNOVATIVE SOLUTIONS DELIVERED



New Mexico Administrative Code (NMAC) Site Characterization Criteria

Title 19, Chapter 15, Part 29, Section 11 of the New Mexico Administrative Code (NMAC) provides requirements for release characterization once the free liquids and recoverable materials have been removed from the Site.

Depth to Groundwater

Depth to groundwater at the release was estimated by evaluating data from the New Mexico Office of the State Engineer (NMOSE) and the United States Geological Survey (USGS) (Figure 2). The nearest groundwater well was approximately 1 mile from the Site; the depth to water in this well was 390 feet below ground surface (bgs).

Wellhead Protection Area

There are no sources of water, including springs, wells, or other sources of fresh water, within one-half mile of the release (Figure 2).

Distance to Nearest Significant Watercourse

A significant watercourse is defined as "...a watercourse with a defined bed and bank either named or identified by a dashed blue line on a USGS 7.5-minute quadrangle map or the next lower order tributary with a defined bed and bank" (19.15.17.7 NMAC) (Figure 2). There are no significant watercourses within one-half mile of the lateral extents of the release.

Additional Site Characterization Criteria

The following is additional information related to characterization of the Site.

Site Characterization	Response/Discussion
What is the shallowest depth to groundwater beneath the area affected by the release?	Greater than 100 feet
Did the release impact groundwater or surface water?	No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or other significant watercourse?	No
Are the lateral extents of the release within 200 feet of a lakebed, sinkhole, or playa lake?	No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital institution, or church?	No
Are the lateral extents of the release within 500 feet of a spring or private, domestic fresh water well used by less than five households for domestic or stock watering purposes?	No



Site Characterization	Response/Discussion
Are the lateral extents of the release within 1,000 feet of any fresh water well or spring?	No
Are the lateral extents of the release within any incorporated municipal boundaries?	No
Are the lateral extents of the release within a defined municipal fresh water well field?	No
Are the lateral extents of the release within 300 feet of a wetland?	No
Are the lateral extents of the release overlying a subsurface mine?	No
Are the lateral extents of the release overlying an unstable area such as karst geology?	The Site is in an area of low potential for karst topography
Are the lateral extents of the release within the 100-year floodplain?	No
Did the release impact areas not on an exploration, development, production, or storage site?	No

Site Delineation

Prior to initiating field activities, HRL submitted a mechanical excavation permit to Devon Energy and had subsurface utilities located at the Site. On March 8, 2020, HRL mobilized to the Site to evaluate the release. Soil samples were collected from nine locations (SP1 through SP9). The soil samples were collected from ground surface. To collect information for the vertical extent of the release, additional samples were collected from SP1 at two-inches below ground surface (bgs), SP3 at four inches bgs, SP5 at two inches bgs, SP5 at five inches bgs, SP7 at five inches bgs, SP9 at five inches, eight inches, and nine inches bgs. Samples were analyzed in the field (field screening) by one or more of the following methods:

- Chloride was approximated using an electrical conductivity (EC) meter in accordance with methods recommended by the U.S. Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS)
- Non-specific volatile organic compounds (VOCs) were measured using a photoionization detector (PID) with a 10.6 electron-volt (eV) lamp
- Total petroleum hydrocarbons (TPH) was measured using a PetroFlag® field test kit in accordance with U.S. Environmental Protection Agency (EPA) Method 9074

Field screening results indicated that electrical conductivity values ranged from 19 microsiemens per centimeter (μ s/cm) to 3,100 μ s/cm and PID values ranged from 3.2 parts per million (ppm) to 98.9 ppm.

Based on the field screening results, HRL mobilized to the Site on April 3, 2020 to collect soil samples for laboratory analysis. Six soil samples (SP9A, SP9B, SP10, SP11, SP12, SP13) were immediately placed on ice and kept under strict chain of custody protocol prior to submission to Hall Environmental Analysis Laboratory of Albuquerque, New Mexico for analysis of:

Cotton Draw Unit 172H (May 2016) June 4, 2020



- Chloride by United States Environmental Protection Agency (US EPA) Method 300.0
- Benzene, toluene, ethyl benzene, and total xylenes (BTEX) by US EPA Method 8021B
- Total petroleum hydrocarbons (TPH) gasoline range organics (GRO), diesel range organics (DRO), and oil range organics (ORO) by US EPA Method 8015M

Closure Criteria

Based on the NMAC Site Characterization Criteria, HRL has applied the following NMOCD Closure Criteria to the release:

Depth to Groundwater	Parameter	Closure Criteria in milligrams per kilogram (mg/kg)
	Chloride	20,000 mg/kg or natural background, whichever is greater
Greater than 100 feet below	Total Petroleum Hydrocarbons (TPH) [Gasoline Range Organics (GRO) + Diesel Range Organics (DRO) + Oil Range Organics (ORO)]	2,500 mg/kg
ground surface	Gasoline Range Organics (GRO) + Diesel Range Organics (DRO)	1,000 mg/kg
	Benzene	10 mg/kg
	Benzene, Toluene, Ethylbenzene, and Total Xylenes (BTEX)	50 mg/kg

Remediation and Reclamation

A scaled diagram depicting the area of investigation and nearby significant features, such as roads, site infrastructure, location of borings, sample points, monitoring wells (if present) and subsurface features (if data was available) has been prepared (Figure 3). HRL utilized a Trimble GeoXT global positioning system (GPS) unit to collect latitude and longitude data for the sample locations.

Chloride, benzene, toluene, ethylbenzene, total xylenes (BTEX), gasoline range organics (GRO), diesel range organics (DRO), and oil range organics (ORO) were not detected in the soil samples (Attachment B). Based on evaluation of the laboratory results of the soil samples, remediation of the impacted soil is not necessary.

Conclusions and Recommendations

Results of soil samples were below the applicable closure criteria specified in 19.15.29.12 NMAC. Therefore, additional remedial action is not necessary; HRL recommends closure of this release.



Scope and Limitations

The scope of HRL's services consists of performing site characterization and preparation of this site characterization report and closure request. All work has been performed in accordance with generally accepted professional environmental consulting practices for oil and gas releases in the Permian Basin.

We appreciate the opportunity to work with Devon on this project. If you have any questions or concerns, please do not hesitate to contact me at (970) 243-3271 or via email at jlinn@hrlcomp.com.

Sincerely,

HRL Compliance Solutions, Inc.

julie L

Julie Linn, PG, RG Project Manager

Figures:

Figure 1: Site Location Figure 2: Depth to Groundwater Figure 3: Sample Location and Results

Tables:

Table 1: Analytical Laboratory Results

Attachments:

Attachment A: Photographs Attachment B: NMOCD Form C-141 Attachment C: Analytical Laboratory Report Received by OCD: 7/8/2020 10:19:04 AM



Figures





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Tables

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Table 1 Soil Sample Results Devon Energy Cotton Draw Unit 172H (May 2016) Eddy County, New Mexico

Sample ID	Depth (inches)	Sample Date	Chloride	Benzene	BTEX	GRO + DRO	ТРН
			Val	lues are in mil	lligrams per k	ilogram (mg/l	kg)
NMOCD Closure Criteria (Groundwater greater than 100 feet) *			20,000	10	50	1,000	2,500
SP9A	0	4/3/2020	ND	ND	ND	ND	ND
SP9B	0	4/3/2020	ND	ND	ND	ND	ND
SP10	SP10 0 4/3/2020		ND	ND	ND	ND	ND
SP11	SP11 0 4/3/2020		ND	ND	ND	ND	ND
SP12	0	4/3/2020	ND	ND	ND	ND	ND
SP13	0	4/3/2020	ND	ND	ND	ND	ND

Notes:

NMOCD: New Mexico Oil Conservation Division

BTEX: Benzene, Toluene, Ethylbenzene, Total Xylenes

GRO: Gasoline Range Organics

DRO: Diesel Range Organics

TPH: Total Petroleum Hydrocarbons

Results shaded in grey exceed closure criteria

* Closure Criteria specified in 19.15.29.12 NMAC



Attachment A

Photographs





Photograph of the release, view to the west

Photograph of the release, view to the east



Attachment B

NMOCD Form C-141

State of New Mexico Energy Minerals and Natural Resources

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

Final Report

Form C-141 Revised August 8, 2011

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

							orrective A	CUON	L		
						OPERATOR Initial Report Final					
		evon Energy				Contact Jake Harrington, Production Foreman					
		Rivers Hwy		NM 88220		Telephone No. 432-214-5175 Facility Type Oil					
Facility Na	me Cotton	Draw Unit	172H			Facility Typ	be Oil				
Surface Ov	vner Feder	ral		Mineral (Owner 1	Federal			API No	a. 30-015-424	-26
				LOCA	TION	OF REI	LEASE				
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				NAT	URE	OF RELI	EASE				
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Produced wa Source of R						20bbls Date and H	Hour of Occurre	nce	Obbls Date and	Hour of Disco	verv
Gasket betw		e & pipe					6 @ 1:30 PM	nee		016 @ 1:30 PM	
Was Immed	iate Notice		Yes	No 🗌 Not Re	equired	If YES, To Shelly Tuck Mike Brate	Whom? ker, BLM				
By Whom? Matt Nettles	, Asst. Produ	uction Forema	an			Date and H May 6, 201	Iour 6 @ 2:30 Shelly				
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District I 1625 N. French Dr., Hobbs, NM 88240 District II 811 S. First St., Artesia, NM 88210 District III 1000 Rio Brazos Road, Aztec, NM 87410 District IV 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-141 Revised August 24, 2018 Submit to appropriate OCD District office

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Incident ID	nAB1613135426
District RP	2RP-3683
Facility ID	
Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	<u>>100 (ft bgs)</u>
Did this release impact groundwater or surface water?	🗌 Yes 🛛 No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	🗌 Yes 🛛 No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	🗌 Yes 🛛 No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	🗌 Yes 🛛 No
Are the lateral extents of the release 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?	🗌 Yes 🛛 No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	🗌 Yes 🛛 No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	🗌 Yes 🛛 No
Are the lateral extents of the release within 300 feet of a wetland?	🗌 Yes 🛛 No
Are the lateral extents of the release overlying a subsurface mine?	🗌 Yes 🛛 No
Are the lateral extents of the release overlying an unstable area such as karst geology?	🗌 Yes 🛛 No
Are the lateral extents of the release within a 100-year floodplain?	🗌 Yes 🛛 No
Did the release impact areas not on an exploration, development, production, or storage site?	🗌 Yes 🛛 No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: Each of the following items must be included in the report.

Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.

🛛 Field data

Data table of soil contaminant concentration data

 \boxtimes Depth to water determination

Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release

Boring or excavation logs

Photographs including date and GIS information

Topographic/Aerial maps

Laboratory data including chain of custody

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age 2	Oil Conservation		Incident ID	
ige 2	On Conservation	Division	District RP	2RP-3683
			Facility ID	
			Application ID	
9.15.29.12 NMAC I hereby certify that regulations all operations	however, use of the table is modified the information given above is true and co ators are required to report and/or file certa	by site- and release-specific p omplete to the best of my knowle in release notifications and perfo	arameters. dge and understand that pu rm corrective actions for re	rsuant to OCD rules and eleases which may endanger
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Oil Conservation Division

Incident ID	nAB1613135426
District RP	2RP-3683
Facility ID	
Application ID	

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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 items must be included in the closure report.

Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)

Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)

Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Tom Bynum	Title: EHS Consultant
Signature: Tom Bynum	Date: 6/4/2020
email: tom.bynum@dvn.com	Telephone: 575-748-0176
OCD Only	
Received by:	Date:
	rty of liability should their operations have failed to adequately investigate and ce water, human health, or the environment nor does not relieve the responsible nd/or regulations.
Closure Approved by: Futtan Hall	Date:11/3/2022
Printed Name: Brittany Hall	Title: Environmental Specialist

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Attachment C

Analytical Laboratory Results

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April 13, 2020

Tom Bynum Devon Energy 6488 Seven Rivers Highway Artesia, NM 88210 TEL: (575) 748-0176 FAX:

RE: Cotton Draw 172H May 2016

OrderNo.: 2004247

Hall Environmental Analysis Laboratory

TEL: 505-345-3975 FAX: 505-345-4107

Website: www.hallenvironmental.com

4901 Hawkins NE

Albuquerque, NM 87109

Dear Tom Bynum:

Hall Environmental Analysis Laboratory received 6 sample(s) on 4/7/2020 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 #NM0901

Sincerely,

andy

Andy Freeman Laboratory Manager 4901 Hawkins NE Albuquerque, NM 87109

Date Reported: 4/13/2020

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Devon Energy **Client Sample ID: SP9A Project:** Cotton Draw 172H May 2016 Collection Date: 4/3/2020 8:14:00 AM Lab ID: 2004247-001 Matrix: SOIL Received Date: 4/7/2020 8:25:00 AM Result **RL** Qual Units DF Analyses **Date Analyzed** EPA METHOD 8015M/D: DIESEL RANGE ORGANICS Analyst: JME Diesel Range Organics (DRO) ND 9.6 mg/Kg 1 4/9/2020 5:20:08 PM Motor Oil Range Organics (MRO) ND 48 mg/Kg 1 4/9/2020 5:20:08 PM Surr: DNOP 92.8 %Rec 1 4/9/2020 5:20:08 PM 55.1-146 **EPA METHOD 8015D: GASOLINE RANGE** Analyst: RAA Gasoline Range Organics (GRO) ND 4/9/2020 9:39:32 AM 4.7 mg/Kg 1 Surr: BFB 95.8 66.6-105 %Rec 1 4/9/2020 9:39:32 AM **EPA METHOD 8021B: VOLATILES** Analyst: RAA Benzene ND 0.024 mg/Kg 4/9/2020 9:39:32 AM 1 Toluene ND 0.047 mg/Kg 1 4/9/2020 9:39:32 AM Ethylbenzene ND 0.047 mg/Kg 1 4/9/2020 9:39:32 AM Xylenes, Total ND 0.094 mg/Kg 1 4/9/2020 9:39:32 AM Surr: 4-Bromofluorobenzene 98.4 80-120 %Rec 1 4/9/2020 9:39:32 AM **EPA METHOD 300.0: ANIONS** Analyst: MRA Chloride 4/9/2020 3:15:19 PM ND 60 mg/Kg 20

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

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix Η
- Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit PQL
- Practical Quanitative Limit
- % Recovery outside of range due to dilution or matrix S

- В Analyte detected in the associated Method Blank
- Е Value above quantitation range
- J Analyte detected below quantitation limits
- Р Sample pH Not In Range
- RL Reporting Limit

Page 1 of 10

Date Reported: 4/13/2020

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Devon Energy **Client Sample ID: SP9B Project:** Cotton Draw 172H May 2016 Collection Date: 4/3/2020 8:16:00 AM Lab ID: 2004247-002 Matrix: SOIL Received Date: 4/7/2020 8:25:00 AM Result **RL** Qual Units DF **Date Analyzed** Analyses EPA METHOD 8015M/D: DIESEL RANGE ORGANICS Analyst: JME Diesel Range Organics (DRO) ND 9.4 mg/Kg 1 4/9/2020 5:44:06 PM Motor Oil Range Organics (MRO) ND 47 mg/Kg 1 4/9/2020 5:44:06 PM Surr: DNOP 99.5 55.1-146 %Rec 1 4/9/2020 5:44:06 PM **EPA METHOD 8015D: GASOLINE RANGE** Analyst: RAA Gasoline Range Organics (GRO) ND 4/9/2020 10:03:08 AM 4.8 mg/Kg 1 Surr: BFB 96.1 66.6-105 %Rec 1 4/9/2020 10:03:08 AM **EPA METHOD 8021B: VOLATILES** Analyst: RAA Benzene ND 0.024 mg/Kg 4/9/2020 10:03:08 AM 1 Toluene ND 0.048 mg/Kg 1 4/9/2020 10:03:08 AM Ethylbenzene ND 0.048 mg/Kg 1 4/9/2020 10:03:08 AM Xylenes, Total ND 0.096 mg/Kg 1 4/9/2020 10:03:08 AM Surr: 4-Bromofluorobenzene 97.8 80-120 %Rec 1 4/9/2020 10:03:08 AM **EPA METHOD 300.0: ANIONS** Analyst: MRA Chloride 4/9/2020 3:52:25 PM ND 60 mg/Kg 20

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

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix Η
- Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- Practical Quanitative Limit POL
- % Recovery outside of range due to dilution or matrix S

- В Analyte detected in the associated Method Blank
- Е Value above quantitation range
- J Analyte detected below quantitation limits
- Р Sample pH Not In Range
- RL Reporting Limit

Page 2 of 10

Date Reported: 4/13/2020

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Devon Energy **Client Sample ID: SP10 Project:** Cotton Draw 172H May 2016 Collection Date: 4/3/2020 8:21:00 AM Lab ID: 2004247-003 Matrix: SOIL Received Date: 4/7/2020 8:25:00 AM Result **RL** Qual Units DF **Date Analyzed** Analyses EPA METHOD 8015M/D: DIESEL RANGE ORGANICS Analyst: JME Diesel Range Organics (DRO) ND 9.5 mg/Kg 1 4/9/2020 6:08:06 PM Motor Oil Range Organics (MRO) ND 48 mg/Kg 1 4/9/2020 6:08:06 PM Surr: DNOP 91.0 55.1-146 %Rec 1 4/9/2020 6:08:06 PM **EPA METHOD 8015D: GASOLINE RANGE** Analyst: RAA Gasoline Range Organics (GRO) ND 4/9/2020 10:26:42 AM 4.7 mg/Kg 1 Surr: BFB 95.4 66.6-105 %Rec 1 4/9/2020 10:26:42 AM **EPA METHOD 8021B: VOLATILES** Analyst: RAA Benzene ND 0.024 mg/Kg 4/9/2020 10:26:42 AM 1 Toluene ND 0.047 mg/Kg 1 4/9/2020 10:26:42 AM Ethylbenzene ND 0.047 mg/Kg 1 4/9/2020 10:26:42 AM Xylenes, Total ND 0.095 mg/Kg 1 4/9/2020 10:26:42 AM Surr: 4-Bromofluorobenzene 98.1 80-120 %Rec 1 4/9/2020 10:26:42 AM **EPA METHOD 300.0: ANIONS** Analyst: MRA Chloride 4/9/2020 4:04:45 PM ND 60 mg/Kg 20

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

Qualifiers:

- * Value exceeds Maximum Contaminant Level. D Sample Diluted Due to Matrix
- Η
- Holding times for preparation or analysis exceeded ND Not Detected at the Reporting Limit
- Practical Quanitative Limit POL
- % Recovery outside of range due to dilution or matrix S

- В Analyte detected in the associated Method Blank
- Е Value above quantitation range
- J Analyte detected below quantitation limits
- Р Sample pH Not In Range
- RL Reporting Limit

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Date Reported: 4/13/2020

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Devon Energy Client Sample ID: SP11 **Project:** Cotton Draw 172H May 2016 Collection Date: 4/3/2020 8:26:00 AM Lab ID: 2004247-004 Matrix: SOIL Received Date: 4/7/2020 8:25:00 AM Result **RL** Qual Units DF **Date Analyzed** Analyses EPA METHOD 8015M/D: DIESEL RANGE ORGANICS Analyst: JME Diesel Range Organics (DRO) ND 9.8 mg/Kg 1 4/9/2020 6:31:52 PM Motor Oil Range Organics (MRO) ND 49 mg/Kg 1 4/9/2020 6:31:52 PM Surr: DNOP 96.9 55.1-146 %Rec 1 4/9/2020 6:31:52 PM **EPA METHOD 8015D: GASOLINE RANGE** Analyst: RAA Gasoline Range Organics (GRO) ND 4/9/2020 10:50:06 AM 4.9 mg/Kg 1 Surr: BFB 95.5 66.6-105 %Rec 1 4/9/2020 10:50:06 AM **EPA METHOD 8021B: VOLATILES** Analyst: RAA Benzene ND 0.025 mg/Kg 4/9/2020 10:50:06 AM 1 Toluene ND 0.049 mg/Kg 1 4/9/2020 10:50:06 AM Ethylbenzene ND 0.049 mg/Kg 1 4/9/2020 10:50:06 AM Xylenes, Total ND 0.099 mg/Kg 1 4/9/2020 10:50:06 AM Surr: 4-Bromofluorobenzene 98.3 80-120 %Rec 1 4/9/2020 10:50:06 AM **EPA METHOD 300.0: ANIONS** Analyst: MRA Chloride 4/9/2020 4:17:06 PM ND 60 mg/Kg 20

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

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to MatrixH Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- 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 Limit

Page 4 of 10

Date Reported: 4/13/2020

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Devon Energy **Client Sample ID: SP12 Project:** Cotton Draw 172H May 2016 Collection Date: 4/3/2020 8:28:00 AM Lab ID: 2004247-005 Matrix: SOIL Received Date: 4/7/2020 8:25:00 AM Result **RL** Qual Units DF Analyses **Date Analyzed** EPA METHOD 8015M/D: DIESEL RANGE ORGANICS Analyst: JME Diesel Range Organics (DRO) ND 9.2 mg/Kg 1 4/9/2020 6:55:35 PM Motor Oil Range Organics (MRO) ND 46 mg/Kg 1 4/9/2020 6:55:35 PM Surr: DNOP 99.0 55.1-146 %Rec 1 4/9/2020 6:55:35 PM **EPA METHOD 8015D: GASOLINE RANGE** Analyst: RAA Gasoline Range Organics (GRO) ND 4/9/2020 11:13:27 AM 5.0 mg/Kg 1 Surr: BFB 95.1 66.6-105 %Rec 1 4/9/2020 11:13:27 AM **EPA METHOD 8021B: VOLATILES** Analyst: RAA Benzene ND 0.025 mg/Kg 4/9/2020 11:13:27 AM 1 Toluene ND 0.050 mg/Kg 1 4/9/2020 11:13:27 AM Ethylbenzene ND 0.050 mg/Kg 1 4/9/2020 11:13:27 AM Xylenes, Total ND 0.099 mg/Kg 1 4/9/2020 11:13:27 AM Surr: 4-Bromofluorobenzene 99.3 80-120 %Rec 1 4/9/2020 11:13:27 AM **EPA METHOD 300.0: ANIONS** Analyst: MRA Chloride 4/9/2020 4:29:27 PM ND 60 mg/Kg 20

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

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to MatrixH Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- 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 Limit

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Date Reported: 4/13/2020

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Devon Energy **Client Sample ID: SP13 Project:** Cotton Draw 172H May 2016 Collection Date: 4/3/2020 8:29:00 AM Lab ID: 2004247-006 Matrix: SOIL Received Date: 4/7/2020 8:25:00 AM Result **RL** Qual Units DF Analyses **Date Analyzed** EPA METHOD 8015M/D: DIESEL RANGE ORGANICS Analyst: JME Diesel Range Organics (DRO) ND 9.3 mg/Kg 1 4/9/2020 7:19:10 PM Motor Oil Range Organics (MRO) ND 47 mg/Kg 1 4/9/2020 7:19:10 PM Surr: DNOP 93.1 55.1-146 %Rec 1 4/9/2020 7:19:10 PM **EPA METHOD 8015D: GASOLINE RANGE** Analyst: RAA Gasoline Range Organics (GRO) ND 4/9/2020 11:36:49 AM 4.9 mg/Kg 1 Surr: BFB 96.5 66.6-105 %Rec 1 4/9/2020 11:36:49 AM **EPA METHOD 8021B: VOLATILES** Analyst: RAA Benzene ND 0.024 mg/Kg 4/9/2020 11:36:49 AM 1 Toluene ND 0.049 mg/Kg 1 4/9/2020 11:36:49 AM Ethylbenzene ND 0.049 mg/Kg 1 4/9/2020 11:36:49 AM Xylenes, Total ND 0.097 mg/Kg 1 4/9/2020 11:36:49 AM Surr: 4-Bromofluorobenzene 99.4 80-120 %Rec 1 4/9/2020 11:36:49 AM **EPA METHOD 300.0: ANIONS** Analyst: MRA Chloride 4/9/2020 4:41:48 PM ND 61 mg/Kg 20

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

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to MatrixH Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- 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 Limit

Page 6 of 10

Client: Project:											
Sample ID: M	B-51683	SampT	ype: m k	olk	Tes	tCode: El	PA Method	300.0: Anions	S		
Client ID: PE	BS	Batch	n ID: 51	683	F	unNo: 6	8004				
Prep Date: 4	4/9/2020	Analysis D	ate: 4/	9/2020	S	eqNo: 2	350088	Units: mg/K	g		
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride		ND	1.5								

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
- PQL Practical Quanitative Limit
- 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 Limit

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2004247

13-Apr-20

WO#:

QC SUMMARY REPORT Hall Environmental Analysis Laboratory, Inc.

Client:	Devon Energy									
Project:	Cotton Draw 1721	H May 2	016							
Sample ID: LCS-5	1627 Samp	TestCode: EPA Method 8015M/D: Diesel Range Organics								
Client ID: LCSS	Bate	ch ID: 51	627	F	RunNo: 6	7934				
Prep Date: 4/7/2	020 Analysis	Analysis Date: 4/8/2020 SeqNo: 2347744 Units					Units: mg/K	g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics	(DRO) 41	10	50.00	0	81.7	70	130			
Surr: DNOP	3.6		5.000		71.9	55.1	146			
Sample ID: MB-51	627 Samp	Туре: МЕ	BLK	Tes	tCode: El	PA Method	8015M/D: Die	esel Rang	e Organics	
Client ID: PBS	Bate	ch ID: 51	627	F	RunNo: 6	7934				
Prep Date: 4/7/2	020 Analysis	Date: 4/	8/2020	5	SeqNo: 2	347745	Units: mg/K	g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics	(DRO) ND	10								
Motor Oil Range Organi	cs (MRO) ND	50								
Surr: DNOP	7.3		10.00		72.5	55.1	146			

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
- PQL Practical Quanitative Limit
- 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 Limit

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2004247

13-Apr-20

WO#:

QC SUMMARY REPORT Hall Environmental Analysis Laboratory, Ind

	WO#:	2004247
ronmental Analysis Laboratory, Inc.		13-Apr-20

Client:Devon HProject:Cotton H	Energy Draw 172H May 2016										
Sample ID: mb-51623 Client ID: PBS	SampType: MBLK Batch ID: 51623	TestCode: EPA Method 8015D: Gasoline Range RunNo: 67938									
Prep Date: 4/7/2020	Analysis Date: 4/9/2020	SeqNo: 2348375 Units: mg/Kg									
Analyte		SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual									
Gasoline Range Organics (GRO) Surr: BFB	ND 5.0 970 1000	96.8 66.6 105									
Sample ID: Ics-51623	SampType: LCS TestCode: EPA Method 8015D: Gasoline Range										
Client ID: LCSS	Batch ID: 51623	RunNo: 67938									
Prep Date: 4/7/2020	Analysis Date: 4/9/2020	SeqNo: 2348376 Units: mg/Kg									
Analyte	Result PQL SPK value	SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual									
Gasoline Range Organics (GRO) Surr: BFB	245.025.0011001000	0 96.8 80 120 111 66.6 105 S									
Sample ID: Ics-51628	SampType: LCS	TestCode: EPA Method 8015D: Gasoline Range									
Client ID: LCSS	Batch ID: 51628	RunNo: 68006									
Prep Date: 4/7/2020	Analysis Date: 4/9/2020	SeqNo: 2350206 Units: %Rec									
Analyte	Result PQL SPK value	SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual									
Surr: BFB	1100 1000	108 66.6 105 S									
Sample ID: mb-51628	SampType: MBLK	TestCode: EPA Method 8015D: Gasoline Range									
Client ID: PBS	Batch ID: 51628	RunNo: 68006									
Prep Date: 4/7/2020	Analysis Date: 4/9/2020	SeqNo: 2350208 Units: %Rec									
Analyte		SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual									
Surr: BFB	970 1000	97.0 66.6 105									

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
- PQL Practical Quanitative Limit
- 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 Limit

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QC SUMMARY REPORT Hall Environmental Analysis Laboratory, Inc.

Client:	Devon Energy												
Project:	Cotton Draw 172	H May 2	016										
Sample ID: mb-51	623 Sam	рТуре: МЕ	BLK	TestCode: EPA Method 8021B: Volatiles									
Client ID: PBS	Ba	tch ID: 51	623	RunNo: 67938									
Prep Date: 4/7/2	020 Analysis	Date: 4/	9/2020	S	SeqNo: 23	348410	Units: mg/Kg						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPDLimit	Qual				
Benzene	ND	0.025											
Toluene	ND	0.050											
Ethylbenzene	ND	0.050											
Xylenes, Total	ND	0.10											
Surr: 4-Bromofluorob	enzene 0.99		1.000		99.4	80	120						
Sample ID: LCS-5	1623 Sam	pType: LC	S	Tes	tCode: EF	PA Method	8021B: Volati	les					
Client ID: LCSS	Ba	tch ID: 51	623	F	RunNo: 67	7938							
Prep Date: 4/7/2	020 Analysis	Date: 4/	9/2020	5	SeqNo: 23	348411	Units: mg/Kg						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual			
Benzene	0.88	0.025	1.000	0	87.6	80	120						
Toluene	0.91	0.050	1.000	0	91.4	80	120						
Ethylbenzene	0.94	0.050	1.000	0	94.4	80	120						
Xylenes, Total	2.9	0.10	3.000	0	95.6	80	120						
Surr: 4-Bromofluorob	enzene 1.0		1.000		103	80	120						
Sample ID: LCS-5	1628 Sam	pType: LC	S	Tes	tCode: EF	PA Method	8021B: Volati	les					
Client ID: LCSS	Ba	tch ID: 51	628	F	RunNo: 68	3006							
Prep Date: 4/7/2	020 Analysis	Date: 4/	9/2020	5	SeqNo: 23	350255	Units: %Rec						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual			
Surr: 4-Bromofluorob	enzene 1.0		1.000		101	80	120						
Sample ID: mb-51	628 Sam	рТуре: МЕ	BLK	Tes	tCode: EF	PA Method	8021B: Volati	les					
Client ID: PBS	Ba	tch ID: 51	628	F	RunNo: 68	3006							
Prep Date: 4/7/2	020 Analysis	Date: 4/	9/2020	S	SeqNo: 23	350257	Units: %Rec						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual			
Surr: 4-Bromofluorob	enzene 0.99		1.000		99.2	80	120						

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- Н Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit

PQL Practical Quanitative Limit

% Recovery outside of range due to dilution or matrix S

- в Analyte detected in the associated Method Blank
- Е Value above quantitation range
- J Analyte detected below quantitation limits
- Р Sample pH Not In Range

RL Reporting Limit

2004247

13-Apr-20

WO#:

			TEL: 50		4901 Hav uerque, N 4X: 505-3	vkins NE M 87109 145-4107	Sample Log-In Check List						
Client Name:	DEVON E	NERGY	Work Ord	er Number: 2	004247			RcptNo:	1				
Received By:	Juan Roj	as	4/7/2020 8:2	25:00 AM		Gua	way						
Completed By	Leah Bad	ca	4/7/2020 9:3	36:45 AM		1	I Bra						
Reviewed By:	LB		1/2/20			Loal	Jule	£					
Chain of Cu	<u>istody</u>												
1. Is Chain of	Custody suffic	ciently complete	e?	Y	′es 🖌	Ν	o 🗌	Not Present					
2. How was th	e sample deli	vered?		<u>C</u>	lient								
Log In 3. Was an atte	empt made to	cool the sampl	es?	Y	es 🗸	N	o 🗌	NA 🗌					
4. Were all sar	mples receive	d at a temperat	ure of >0° C to 6.	0°C Y	es 🗹	N	o 🗌	NA 🗌					
5. Sample(s) i	n proper conta	ainer(s)?		Y	es 🖌	N	o 🗌						
6. Sufficient sa	mple volume	for indicated te	st(s)?	Y	es 🗹	No							
7. Are samples	except VOA	and ONG) pro	perly preserved?	Ye	es 🖌	No							
8. Was preserv	vative added t	o bottles?		Ye	es 🗌	No		NA 🗌					
9. Received at	least 1 vial wi	ith headspace ·	<1/4" for AQ VOA?	Ye Ye	es 🗌	No		NA 🗹					
10. Were any s	ample contain	ers received br	oken?	Y	es 🗌	N	o 🗹 🏻	# of preserved bottles checked					
11.Does papen (Note discre		ottle labels? ain of custody)		Ye	es 🗹	No		for pH:	>12 unless noted)				
12. Are matrices	correctly ide	ntified on Chair	n of Custody?	Ye	es 🗸	No		Adjusted?					
13. Is it clear wh	at analyses w	vere requested?	?	Ye	es 🖌	No							
14.Were all hol (If no, notify		le to be met? authorization.)		Ye	es 🗹	No		Checked by: D	AD 4/7/20				
Special Hand	lling (if ap	plicable)											
15. Was client	notified of all o	discrepancies w	vith this order?	Y	es 🗌	N	o 🗌	NA 🗹					
Perso	n Notified:	[Date:									
By W	hom:			Via:	eMail [] Phone [Fax	In Person					
Rega Client	rding: Instructions:	 											
16. Additional I	emarks:												
17. <u>Cooler Infe</u> Cooler N	source periods are private to the	Condition	Seal Intact Se	al No Sea	l Date	Signed	d By						
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2	2.5	Good											

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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

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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:
	Pima Environmental Services, LLC	329999
	5614 N Lovington Hwy	Action Number:
	Hobbs, NM 88240	9123
		Action Type:
		[C-141] Release Corrective Action (C-141)

CONDITIONS

Created By		Condition Date
bhall	None	11/3/2022

Action 9123

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