Received by OCD: 7/11/2023 9:59:25 AM Form C-141 State of New Mexico

Oil Conservation Division

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Incident ID	nAPP2309726350
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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?	Unknown (ft
Did this release impact groundwater or surface water?	bgs) □ 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

Page 3

- Data table of soil contaminant concentration data
- Depth to water determination
- Determination of water sources and significant watercourses within ¹/₂-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

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

Received by OCD: 7/11/ Form C-141 Page 4	2023 9:59:25 AM State of New Mexico Oil Conservation Division			Incident ID District RP Facility ID Application ID	Page 2 of 75 nAPP2309726350
regulations all operators public health or the envir failed to adequately invest	nformation given above is true and complete to the are required to report and/or file certain release nor comment. The acceptance of a C-141 report by the stigate and remediate contamination that pose a thr be of a C-141 report does not relieve the operator o	tifications OCD does eat to grou	and perform co not relieve the indwater, surfa	rrective actions for relea operator of liability sho ce water, human health	ases which may endanger ould their operations have or the environment. In
Printed Name: Dale			Env. Profess	sional	
Signature: Dale (dale.wooda					
OCD Only Received by: Shelly V	Vells		Date: 7/11/2	023	

Received by OCD: 7/11/2023 9:59:25 AM Form C-141 State of New Mexico

Oil Conservation Division

	Page 3 of	79
Incident ID	nAPP2309726350	
District RP		
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Application ID

Remediation Plan

Remediation Plan Checklist: Each of the following items must be	e included in the plan.
 Detailed description of proposed remediation technique Scaled sitemap with GPS coordinates showing delineation point Estimated volume of material to be remediated Closure criteria is to Table 1 specifications subject to 19.15.29.1 Proposed schedule for remediation (note if remediation plan times) 	2(C)(4) NMAC
Deferral Requests Only: Each of the following items must be con	firmed as part of any request for deferral of remediation.
Contamination must be in areas immediately under or around pr deconstruction.	oduction equipment where remediation could cause a major facility
Extents of contamination must be fully delineated.	
Contamination does not cause an imminent risk to human health	, the environment, or groundwater.
I hereby certify that the information given above is true and complet rules and regulations all operators are required to report and/or file c which may endanger public health or the environment. The acceptan liability should their operations have failed to adequately investigate surface water, human health or the environment. In addition, OCD a responsibility for compliance with any other federal, state, or local la	ertain release notifications and perform corrective actions for releases nee of a C-141 report by the OCD does not relieve the operator of and remediate contamination that pose a threat to groundwater, neceptance of a C-141 report does not relieve the operator of
Printed Name: Dale Woodall	Title: Env. Professional
Signature: Dale Woodall	Date: <u>7/11/2023</u>
email:dale.woodall@dvn.com	Telephone:575-748-1838
OCD Only	
Received by: <u>Shelly Wells</u>	Date: <u>7/11/2023</u>
Approved Approved with Attached Conditions of A	Approval Denied Deferral Approved
Signature:	Date:

Page 5

Page 6

Oil Conservation Division

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Incident ID	nAPP2309726350
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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.

<u>Closure Report Attachment Checklist</u>: Each of the following items must be included in the closure report.

A scaled site and sampling diagram as described in 19.15.29.11 NMAC

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: Dale Woodall	Title: <u>Env. Professional</u>
Signature: Dale Woodall	Date: _7/11/2023
email:dale.woodall@dvn.com	Telephone: <u>575-748-1838</u>
OCD Only	
Received by: <u>Shelly Wells</u>	Date: <u>7/11/2023</u>
	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:	Date:
Printed Name:	Title:



209 W. McKay Carlsbad, New Mexico 88220 Tel. 432.701.2159 www.ntgenvironmental.com

July 10, 2023

Mike Bratcher District Supervisor Oil Conservation Division, District 2 811 S. First Street Artesia, New Mexico 88210

Re: Closure Report Cotton Draw Unit 118 Battery Unit B, S26, T24S, R31E Site Coordinates: 32.1946214, -103.7465856 Eddy County, New Mexico Incident ID: nAPP2309726350

Mr. Bratcher:

On behalf of Devon Energy Production Company (Devon), NTG Environmental, LLC (NTGE) has prepared this letter to document site assessment and remedial action activities at the Cotton Draw Unit 118 Battery (Site). The Site is located approximately 19.15 miles east of Malaga, New Mexico in Eddy County (Figures 1 and 2).

Background

Based on the initial C-141 (attached) obtained from the New Mexico Oil Conservation Division (NMOCD), the release was discovered on April 4th, 2023. The release resulted from the water tank pushing oil into a vent line and combustor, releasing approximately 0.076 barrels (bbls) of crude oil, of which 0 bbls were recovered. The release caused a small fire at the combustor, and some light overspray from the tank battery was released onto the pad. Upon discovery, the well was shut-in, and the area secured. The release area is shown on Figure 3.

Site Characterization

Based on a review of the New Mexico Office of State Engineers and USGS databases, there no known water sources within a ¹/₂-mile radius of the Site, with the site located in a low karst area. The nearest identified well is located approximately 0.96 miles northwest of the Site in Sec 36 T24S R31E. The well was drilled in 2020 with a reported depth to groundwater of 868 feet below ground surface (ft bgs). A copy of the site characterization information and the associated USGS summary report is attached.

Mr. Mike Bratcher July 10, 2023 Page 2 of 3

Regulatory Criteria

In accordance with the NMOCD regulatory criteria established in 19.15.29.12 NMAC, the following criteria are applicable to the Site.

- Benzene: 10 milligrams per kilogram (mg/kg).
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg.
- TPH (GRO + DRO + MRO): 100 mg/kg.
- Chloride: 600 mg/kg

Site Assessment and Liner Inspection

On April 28th, 2023, NTG Environmental, LLC (NTGE) conducted site assessment activities to assess the integrity and state of the tank battery's secondary containment liner and the extent of impacts at the Site. Upon inspection it was noted that the liner was intact with no visible holes or breaches, and free of any standing fluids. Due to high winds, light overspray was released onto the pad. A total of four (4) vertical sample points (i.e., S-1 through S-4), as well as eight (8) horizontal sample points (i.e., H-1 through H-8) were installed within and adjacent to the release area to characterize the impacts. Soil samples were collected in half foot intervals from depths ranging from 0 - 1.5 ft below ground surface (bgs). Sample locations from NTGE's assessment activities are shown in Figure 3. Analytical results from NTGE's assessment (attached in Table 1), indicated that total petroleum hydrocarbons (TPH) and chlorides within the release extent exceeded NMOCD regulatory thresholds.

Remedial Action Activities and Confirmation Sampling

Devon proceeded with remedial action activities at the Site to include the excavation and disposal of impacted soils above the regulatory limits. The release area was excavated to a depth of 1 ft bgs within the release area. The excavation area is illustrated on Figure 4.

Upon completion of the excavation, a total of eight (8) confirmation samples were collected from the excavation base (i.e., CS-1 through CS-8) and eight (8) confirmation samples were collected from the excavation sidewalls (i.e., SW-1 through SW-8) to ensure impacted soils were successfully removed. Analytical results indicated that impacted soils had been removed and the Site required no further excavation. A photographic log documenting site conditions during confirmation sampling activities is attached.

The confirmation samples were collected every 200 square feet and submitted to the lab under proper chain-of-custody protocol for analysis. The excavation was backfilled and returned to near-natural grade. The final excavation extent and confirmation sample locations are shown in Figure 4. Analytical results of the confirmation samples are included in Table 2.

Closing

Based on the assessment and subsequent remedial action activities, the Site is compliant with NMOCD's regulatory limits, and no further actions are required at the site. A copy of the final C- 141 is attached, and Devon formally requests a no further action designation for the Site. If you have any questions regarding this report or need additional information, please contact us at 432-701-2159.



Mr. Mike Bratcher July 10, 2023 Page 3 of 3

Sincerely, NTG Environmental

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Ethan Sessums Project Manager

Attachments:

- Initial And Final C-141
- Site Characterization Information
- Tables
- Figures
- Photographic LogLaboratory Reports and Chain-of-Custody



NTG

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INITIAL AND FINAL C-141

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	
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Application ID	

Release Notification

Responsible Party

Responsible Party	OGRID
Contact Name	Contact Telephone
Contact email	Incident # (assigned by OCD)
Contact mailing address	

Location of Release Source

Longitude

Latitude			

Site Name	Site Type
Date Release Discovered	API# (if applicable)

(NAD 83 in decimal degrees to 5 decimal places)

Unit Letter	Section	Township	Range	County

Surface Owner: State Federal Tribal Private (Name: _

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of total dissolved solids (TDS) in the produced water >10,000 mg/l?	Yes No
Condensate	Volume Released (bbls)	Volume Recovered (bbls)
Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)
Cause of Release		

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Oil Conservation Division

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Was this a major release as defined by 19.15.29.7(A) NMAC?	If YES, for what reason(s) does the responsible party consider this a major release?
Yes No	
If YES, was immediate n	otice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

The source of the release has been stopped.

The impacted area has been secured to protect human health and the environment.

Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.

All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not been undertaken, explain why:

Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.

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.

Printed Name: Dale Woodall	Title: Env. Professional
Signature: Dale Woodall	Date:
email:dale.woodall@dvn.com	Telephone:
OCD Only	
Received by: Shelly Wells	Date: <u>6/22/2023</u>

Received by OCD: 7/11/2023 9:59:25 AM Form C-141 State of New Mexico

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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?		
Did this release impact groundwater or surface water?	$ \begin{array}{c} \text{bgs}) \\ \square \text{ Yes} \boxed{\boxtimes} \text{ No} \\ \end{array} $	
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

Page 3

- Data table of soil contaminant concentration data
- \square Depth to water determination
- Determination of water sources and significant watercourses within ¹/₂-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

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

orm C-141	1 by OCD: 7/11/2023 9:59:25 AM State of New Mexico			Incident ID	nAPP2309726350
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				Application ID	
regulations all operators are public health or the environ failed to adequately investi- addition, OCD acceptance and/or regulations.	ormation given above is true and complete to the e required to report and/or file certain release no ment. The acceptance of a C-141 report by the gate and remediate contamination that pose a the of a C-141 report does not relieve the operator of oodall	otifications OCD does areat to grou of responsil	and perform co not relieve the indwater, surfa pility for compl	prective actions for rele operator of liability sho ce water, human health	ases which may endanger ould their operations have or the environment. In
Printed Name: <u>Dale Wo</u> Signature: <u>Dale U</u> dale.woodalle email:	Ødvn.com,		7/11/2023 one: 575-74		

Received by OCD: 7/11/2023 9:59:25 AM Form C-141 State of New Mexico

Oil Conservation Division

<u>Remediation Plan Checklist</u>: Each of the following items must be included in the plan.

Incident ID	nAPP2309726350
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Application ID	

Remediation Plan

Detailed description of proposed remediation technique Scaled sitemap with GPS coordinates showing delineation points \boxtimes Estimated volume of material to be remediated Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required) Deferral Requests Only: Each of the following items must be confirmed as part of any request for deferral of remediation. Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction. Extents of contamination must be fully delineated. Contamination does not cause an imminent risk to human health, the environment, or groundwater. 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. Printed Name: Dale Woodall Title: Env. Professional Signature: Dale Woodall Date: 7/11/2023 email: dale.woodall@dvn.com Telephone: 575-748-1838 **OCD Only** Received by: Date: Approved Approved with Attached Conditions of Approval Denied Deferral Approved Signature: Date:

Page 6

Oil Conservation Division

Incident ID	nAPP2309726350
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.

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: Dale Woodall	Title: Env. Professional
Signature: Dale Woodall	Date: <u>7/11/2023</u>
email:dale.woodall@dvn.com	Telephone: <u>575-748-1838</u>
OCD Only	
Received by:	Date:
	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:	Date:
Printed Name:	Title:

COTTON DRAW UNIT 118

Ocd id=nAPP2309726350

4/4/2023

Spill Volume(Bbls) Calculator Inputs in blue, Outputs in red				
Contaminated Soil measurement				
Area (square feet)		Depth(inches)		
<u>520.</u>	103	0.063		
Cubic Feet of S	oil Impacted	<u>2.709</u>		
Barrels of So	il Impacted	<u>0.48</u>		
Soil T	ype	Clay/Sand		
Barrels of Oil Assuming 100% Saturation		<u>0.07</u>		
Saturation	Damp n	no fluid when squeezed		
Estimated Barrels of Oil Released		0.01		
Free Standing Fluid Only				
Area (square feet) Depth(inches)				
<u>0.901</u>		<u>0.250</u>		
Standing fluid		0.003		
Total fluid	s spilled	<u>0.076</u>		

•

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:
DEVON ENERGY PRODUCTION COMPANY, LP	6137
333 West Sheridan Ave.	Action Number:
Oklahoma City, OK 73102	231891
	Action Type:
	[C-141] Release Corrective Action (C-141)

CONDITIONS

Created By Condition scwells None

CONDITIONS

Action 231891

Condition Date

6/23/2023

SITE CHARACTERIZATION INFORMATION



Released to Imaging: 3/12/2024 8:38:50

New Mexico Oil Conservation Division



OSE POD Locations Map



4/24/2023, 10:03:14 AM

____ OSE District Boundary

Surface Water Sub Basins

SiteBoundaries

Surface Water Basins

Lower Pecos Released to Imaging: 3/12/2024 8:38:50 AM 1:18,056 0 0.13 0.25 0.5 mi 0 0.2 0.4 0.8 km Esri, HERE, iPC, U.S. Department of Energy Office of Legacy Management, Esri, HERE, Garmin, iPC, Maxar

> Web Generated Map Map is generated by web users.



Received by OCD: 7/11/2023 9:59:25,AM National Flood Hazard Layer FIRMette



Legend

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Releasea to Imaging: 3/12/2024 8.98:50 AM 1,500 2.000

Basemap: USGS National Map: Orthoimagery: Data refreshed October, 2020



National Water Information System: Mapper



U.S. Fish and Wildlife Service

National Wetlands Inventory

Cotton Draw 118H Battery



April 24, 2023

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Released to Imaging: 3/12/2024 8:38:50 AM
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- **Freshwater Pond**

Lake Other Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the

Wetlands Mapper web site.

TABLES

Table 1 Summary of Soil Analytical Data - Delineation Samples Cotton Draw Unit 118 Battery Devon Energy Production Company Eddy County, New Mexico

										ТРН			
Sample ID	Sample Date	Depth (ft bgs)	Benzene	Toluene	Ethylbenzene	Xylenes	BTEX	GRO (C6-C10)	DRO (C10-C28)	GRO + DRO (C6-C28)	MRO (C28-C35)	Total GRO/DRO/MRO (C6-C35)	Chloride
			(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
			Table I Closure Criteria for Soil 0-50 feet Depth to Groundwater 19.15.29 NMAC										
			10 mg/kg				50 mg/kg					100 mg/kg	600 mg/kg
Vertical Delineation Samples													
S-1	4/28/2023	(0-6")	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	3,900	3,900	1,020	4,920	352
S-1	4/28/2023	(1-1.5')	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	96
S-2	4/28/2023	(0-6")	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	230	230	80.9	310.9	736
S-2	4/28/2023	(1-1.5')	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	80
S-3	4/28/2023	(0-6")	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	3,280	3,280	1,120	3,400	800
S-3	4/28/2023	(1-1.5')	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	80
S-4	4/28/2023	(0-6")	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	947	947	463	1,410	592
S-4	4/28/2023	(1-1.5')	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	14.3	14.3	80
Horizontal Delineation Samples													
H-1	4/28/2023	(0-6")	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	80
H-2	4/28/2023	(0-6")	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	80
H-3	4/28/2023	(0-6")	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	96
H-4	4/28/2023	(0-6")	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	80
H-5	4/28/2023	(0-6")	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	112
H-6	4/28/2023	(0-6")	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	80
H-7	4/28/2023	(0-6")	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	96
H-8	4/28/2023	(0-6")	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	96

Notes:

1. Values reported in mg/kg

2.< = Value Less Than Reporting Limit (RL)

3. Bold indicates Analyte Detected

4. BTEX analyses by EPA Method SW 8021B 8.

SP-1 Sample Point Excavated

5. TPH analyses by EPA Method SW 8015 Mod.

6. GRO/DRO/MRO - Gasoline/Diesel/Motor Oil

7. Yellow shaded cells indicate analytical samples that exceed the NMAC 19.15.29.12 Table I Closure Criteria for the site.

8. Peach shaded cells indicate analytical samples that exceed the NMAC 19.15.29.13 Table I Closure Criteria for the site (Surface to 4 Feet Below Grade).

ed 9. --- Not Analyzed

Page 26 of 79

Table 2 Summary of Soil Analytical Data - Confirmation Samples Cotton Draw Unit 118 Battery Devon Energy Production Company Eddy County, New Mexico

	Sample Date	Depth (ft bgs)			Ethylbenzene	Xylenes	втех	ТРН					
Sample ID			Benzene	Toluene				GRO (C6-C-10)	DRO (C10-C28)	GRO + DRO (C6-C28)	MRO (C28-C35)	Total GRO/DRO/MRO (C6-C35)	Chloride
			(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
			Table I Closure Criteria for Soil 0-50 feet Depth to Groundwater 19.15.29 NMAC										
			10 mg/kg				50 mg/kg					100 mg/kg	600 mg/kg
Base Samples													
CS-1	6/20/2023	1'	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	144
CS-2	6/20/2023	1'	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	80
CS-3	6/20/2023	1'	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	16
CS-4	6/20/2023	1'	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	48
CS-5	6/20/2023	1'	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	208
CS-6	6/20/2023	1'	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	80
CS-7	6/20/2023	1'	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	112
CS-8	6/20/2023	1'	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	48
					9	Sidewall San	nples						
SW-1	6/20/2023	0-1'	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	284
SW-2	6/20/2023	0-1'	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	32
SW-3	6/20/2023	0-1'	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	208
SW-4	6/20/2023	0-1'	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	176
SW-5	6/20/2023	0-1'	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	16
SW-6	6/20/2023	0-1'	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	64
SW-7	6/20/2023	0-1'	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	32
SW-8	6/20/2023	0-1'	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	32
Notes:													

Notes:

1. Values reported in mg/kg

SP-1

2.< = Value Less Than Reporting Limit (RL)3. Bold indicates Analyte Detected4. BTEX analyses by EPA Method SW 8021B

5. TPH analyses by EPA Method SW 8015 Mod. 6. GRO/DRO/MRO - Gasoline/Diesel/Motor Oil

9. --- Not Analyzed

7. Yellow shaded cells indicate analytical samples that exceed the NMAC 19.15.29.12 Table I Closure Criteria for the site.

8. Peach shaded cells indicate analytical samples that exceed the NMAC 19.15.29.13 Table I Closure Criteria for the site (Surface to 4 Feet Below Grade).

Sample Point Excavated

FIGURES



Released to Imaging: 3/12/2024 8:38:50 AM



Released to Imaging: 3/12/2024 8:38:50 AM



Released to Imaging: 3/12/2024 8:38:50 AM



Released to Imaging: 3/12/2024 8:38:50 AM

Devon Energy Production Company

Photograph No. 1

Facility:Cotton Draw Unit 118 BatteryCounty:Eddy County, New Mexico

Description:

View of Final Excavation.



Photograph No. 2

Facility:	Cotton Draw Unit 118 Battery						
_							

County: Eddy County, New Mexico

Description:

View of Final Excavation.



Photograph No. 3

Facility: Cotton Draw Unit 118 Battery

County: Eddy County, New Mexico

Description: View of Final Excavation.



Devon Energy Production Company

Photograph No. 4

Facility:	Cotton Draw Unit 118 Battery			
County:	Eddy County, New Mexico			

Description:

View of Final Excavation.



Photograph No. 5

Facility:	Cotton Draw Unit 118 Battery
County:	Eddy County, New Mexico

Description:

View of Final Excavation.



Photograph No. 6

Facility: Cotton Draw Unit 118 Battery

County: Eddy County, New Mexico

Description:

View of Final Excavation.



Devon Energy Production Company

Photograph No. 7

View of Liner.

Facility:	Cotton Draw Unit 118 Battery
County:	Eddy County, New Mexico
Description:	



Photograph No. 8

Facility:	Cotton Draw Unit 118 Battery
County:	Eddy County, New Mexico

Description:

View of Liner.



Photograph No. 9

- Facility: Cotton Draw Unit 118 Battery
- County: Eddy County, New Mexico

Description:

View of Liner.


PHOTOGRAPHIC LOG

Devon Energy Production Company

Photograph No. 10

View of Liner.

Facility:	Cotton Draw Unit 118 Battery
County:	Eddy County, New Mexico
Description:	



Photograph No. 11

Facility:	Cotton Draw Unit 118 Battery
County:	Eddy County, New Mexico

Description:

View of Liner.



Photograph No. 12

- Facility: Cotton Draw Unit 118 Battery
- County: Eddy County, New Mexico

Description:

View of Liner.



LABORATORY REPORTS AND CHAIN-OF-CUSTODY DOCUMENTS



May 02, 2023

ETHAN SESSUMS NTG ENVIRONMENTAL 701 TRADEWINDS BLVD. SUITE C MIDLAND, TX 79706

RE: COTTON DRAW UNIT 118 BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 04/28/23 11:03.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keine

Celey D. Keene Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	04/28/2023	Sampling Date:	04/28/2023
Reported:	05/02/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW UNIT 118 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	237283	Sample Received By:	Shalyn Rodriguez
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: S - 1 (0-0.5') (H232097-01)

BTEX 8021B	mg	/kg	Analyze	ed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/28/2023	ND	2.02	101	2.00	0.732	
Toluene*	<0.050	0.050	04/28/2023	ND	2.05	103	2.00	0.898	
Ethylbenzene*	<0.050	0.050	04/28/2023	ND	2.07	103	2.00	0.422	
Total Xylenes*	<0.150	0.150	04/28/2023	ND	6.27	105	6.00	0.819	
Total BTEX	<0.300	0.300	04/28/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	104	% 71.5-13	24						
Chloride, SM4500Cl-B	mg,	/kg	Analyze	ed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	352	16.0	05/01/2023	ND	448	112	400	3.64	
TPH 8015M	mg	/kg	Analyze	ed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	04/28/2023	ND	182	90.8	200	3.09	
DRO >C10-C28*	3900	10.0	04/28/2023	ND	171	85.5	200	4.51	
EXT DRO >C28-C36	1020	10.0	04/28/2023	ND					
Surrogate: 1-Chlorooctane	79.1	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	124	% 49.1-14	18						

Cardinal Laboratories

*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	04/28/2023	Sampling Date:	04/28/2023
Reported:	05/02/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW UNIT 118 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	237283	Sample Received By:	Shalyn Rodriguez
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: S - 1 (1-1.5') (H232097-02)

BTEX 8021B	mg/	′kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/28/2023	ND	2.02	101	2.00	0.732	
Toluene*	<0.050	0.050	04/28/2023	ND	2.05	103	2.00	0.898	
Ethylbenzene*	<0.050	0.050	04/28/2023	ND	2.07	103	2.00	0.422	
Total Xylenes*	<0.150	0.150	04/28/2023	ND	6.27	105	6.00	0.819	
Total BTEX	<0.300	0.300	04/28/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	103 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	′kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	05/01/2023	ND	448	112	400	3.64	
TPH 8015M	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/01/2023	ND	182	90.8	200	3.09	
DRO >C10-C28*	<10.0	10.0	05/01/2023	ND	171	85.5	200	4.51	
EXT DRO >C28-C36	<10.0	10.0	05/01/2023	ND					
Surrogate: 1-Chlorooctane	113 %	48.2-13	4						
Surrogate: 1-Chlorooctadecane	118 9	% 49.1-14	8						

Cardinal Laboratories

*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	04/28/2023	Sampling Date:	04/28/2023
Reported:	05/02/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW UNIT 118 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	237283	Sample Received By:	Shalyn Rodriguez
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: S - 2 (0-0.5') (H232097-03)

BTEX 8021B	mg	/kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/28/2023	ND	2.02	101	2.00	0.732	
Toluene*	<0.050	0.050	04/28/2023	ND	2.05	103	2.00	0.898	
Ethylbenzene*	<0.050	0.050	04/28/2023	ND	2.07	103	2.00	0.422	
Total Xylenes*	<0.150	0.150	04/28/2023	ND	6.27	105	6.00	0.819	
Total BTEX	<0.300	0.300	04/28/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	105	% 71.5-13	4						
Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	736	16.0	05/01/2023	ND	448	112	400	3.64	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	04/28/2023	ND	182	90.8	200	3.09	
DRO >C10-C28*	230	10.0	04/28/2023	ND	171	85.5	200	4.51	
EXT DRO >C28-C36	80.9	10.0	04/28/2023	ND					
Surrogate: 1-Chlorooctane	76.6	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	90.2	% 49.1-14	8						

Cardinal Laboratories

*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	04/28/2023	Sampling Date:	04/28/2023
Reported:	05/02/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW UNIT 118 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	237283	Sample Received By:	Shalyn Rodriguez
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: S - 2 (1-1.5') (H232097-04)

BTEX 8021B	mg/	kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/28/2023	ND	2.02	101	2.00	0.732	
Toluene*	<0.050	0.050	04/28/2023	ND	2.05	103	2.00	0.898	
Ethylbenzene*	<0.050	0.050	04/28/2023	ND	2.07	103	2.00	0.422	
Total Xylenes*	<0.150	0.150	04/28/2023	ND	6.27	105	6.00	0.819	
Total BTEX	<0.300	0.300	04/28/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	105 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	05/01/2023	ND	448	112	400	3.64	
TPH 8015M	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	04/28/2023	ND	182	90.8	200	3.09	
DRO >C10-C28*	<10.0	10.0	04/28/2023	ND	171	85.5	200	4.51	
EXT DRO >C28-C36	<10.0	10.0	04/28/2023	ND					
Surrogate: 1-Chlorooctane	73.3	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	74.5	% 49.1-14	8						

Cardinal Laboratories

*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	04/28/2023	Sampling Date:	04/28/2023
Reported:	05/02/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW UNIT 118 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	237283	Sample Received By:	Shalyn Rodriguez
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: S - 3 (0-0.5') (H232097-05)

BTEX 8021B	mg/	/kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/28/2023	ND	2.02	101	2.00	0.732	
Toluene*	<0.050	0.050	04/28/2023	ND	2.05	103	2.00	0.898	
Ethylbenzene*	<0.050	0.050	04/28/2023	ND	2.07	103	2.00	0.422	
Total Xylenes*	<0.150	0.150	04/28/2023	ND	6.27	105	6.00	0.819	
Total BTEX	<0.300	0.300	04/28/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	102 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	800	16.0	05/01/2023	ND	448	112	400	3.64	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	04/28/2023	ND	182	90.8	200	3.09	
DRO >C10-C28*	3280	10.0	04/28/2023	ND	171	85.5	200	4.51	
EXT DRO >C28-C36	1120	10.0	04/28/2023	ND					
Surrogate: 1-Chlorooctane	78.1	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	120 9	% 49.1-14	8						

Cardinal Laboratories

*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	04/28/2023	Sampling Date:	04/28/2023
Reported:	05/02/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW UNIT 118 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	237283	Sample Received By:	Shalyn Rodriguez
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: S - 3 (1-1.5') (H232097-06)

BTEX 8021B	mg,	/kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/28/2023	ND	2.02	101	2.00	0.732	
Toluene*	<0.050	0.050	04/28/2023	ND	2.05	103	2.00	0.898	
Ethylbenzene*	<0.050	0.050	04/28/2023	ND	2.07	103	2.00	0.422	
Total Xylenes*	<0.150	0.150	04/28/2023	ND	6.27	105	6.00	0.819	
Total BTEX	<0.300	0.300	04/28/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	103	% 71.5-13	4						
Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	05/01/2023	ND	448	112	400	3.64	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/02/2023	ND	182	90.8	200	3.09	
DRO >C10-C28*	<10.0	10.0	05/02/2023	ND	171	85.5	200	4.51	
EXT DRO >C28-C36	<10.0	10.0	05/02/2023	ND					
Surrogate: 1-Chlorooctane	72.5	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	76.1	% 49.1-14	8						

Cardinal Laboratories

*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	04/28/2023	Sampling Date:	04/28/2023
Reported:	05/02/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW UNIT 118 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	237283	Sample Received By:	Shalyn Rodriguez
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: S - 4 (0-0.5') (H232097-07)

BTEX 8021B	mg,	/kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/28/2023	ND	2.02	101	2.00	0.732	
Toluene*	<0.050	0.050	04/28/2023	ND	2.05	103	2.00	0.898	
Ethylbenzene*	<0.050	0.050	04/28/2023	ND	2.07	103	2.00	0.422	
Total Xylenes*	<0.150	0.150	04/28/2023	ND	6.27	105	6.00	0.819	
Total BTEX	<0.300	0.300	04/28/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	103	% 71.5-13	4						
Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	592	16.0	05/01/2023	ND	448	112	400	3.64	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	04/28/2023	ND	182	90.8	200	3.09	
DRO >C10-C28*	947	10.0	04/28/2023	ND	171	85.5	200	4.51	
EXT DRO >C28-C36	463	10.0	04/28/2023	ND					
Surrogate: 1-Chlorooctane	78.4	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	114 9	% 49.1-14	8						

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	04/28/2023	Sampling Date:	04/28/2023
Reported:	05/02/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW UNIT 118 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	237283	Sample Received By:	Shalyn Rodriguez
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: S - 4 (1-1.5') (H232097-08)

BTEX 8021B	mg,	′kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/28/2023	ND	2.02	101	2.00	0.732	
Toluene*	<0.050	0.050	04/28/2023	ND	2.05	103	2.00	0.898	
Ethylbenzene*	<0.050	0.050	04/28/2023	ND	2.07	103	2.00	0.422	
Total Xylenes*	<0.150	0.150	04/28/2023	ND	6.27	105	6.00	0.819	
Total BTEX	<0.300	0.300	04/28/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	103	% 71.5-13	4						
Chloride, SM4500Cl-B	mg,	′kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	05/01/2023	ND	448	112	400	3.64	
TPH 8015M	mg,	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	04/28/2023	ND	182	90.8	200	3.09	
DRO >C10-C28*	<10.0	10.0	04/28/2023	ND	171	85.5	200	4.51	
EXT DRO >C28-C36	14.3	10.0	04/28/2023	ND					
Surrogate: 1-Chlorooctane	70.0	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	72.4	% 49.1-14	8						

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Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	04/28/2023	Sampling Date:	04/28/2023
Reported:	05/02/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW UNIT 118 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	237283	Sample Received By:	Shalyn Rodriguez
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: H - 1 (0-0.5') (H232097-09)

BTEX 8021B	mg/	′kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/28/2023	ND	2.02	101	2.00	0.732	
Toluene*	<0.050	0.050	04/28/2023	ND	2.05	103	2.00	0.898	
Ethylbenzene*	<0.050	0.050	04/28/2023	ND	2.07	103	2.00	0.422	
Total Xylenes*	<0.150	0.150	04/28/2023	ND	6.27	105	6.00	0.819	
Total BTEX	<0.300	0.300	04/28/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	104 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	′kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	05/01/2023	ND	448	112	400	3.64	
TPH 8015M	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	04/28/2023	ND	182	90.8	200	3.09	
DRO >C10-C28*	<10.0	10.0	04/28/2023	ND	171	85.5	200	4.51	
EXT DRO >C28-C36	<10.0	10.0	04/28/2023	ND					
Surrogate: 1-Chlorooctane	71.9	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	74.8	% 49.1-14	8						

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Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	04/28/2023	Sampling Date:	04/28/2023
Reported:	05/02/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW UNIT 118 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	237283	Sample Received By:	Shalyn Rodriguez
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: H - 2 (0-0.5') (H232097-10)

BTEX 8021B	mg/	′kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/28/2023	ND	2.02	101	2.00	0.732	
Toluene*	<0.050	0.050	04/28/2023	ND	2.05	103	2.00	0.898	
Ethylbenzene*	<0.050	0.050	04/28/2023	ND	2.07	103	2.00	0.422	
Total Xylenes*	<0.150	0.150	04/28/2023	ND	6.27	105	6.00	0.819	
Total BTEX	<0.300	0.300	04/28/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	103 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	′kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	05/01/2023	ND	448	112	400	3.64	
TPH 8015M	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	04/28/2023	ND	182	90.8	200	3.09	
DRO >C10-C28*	<10.0	10.0	04/28/2023	ND	171	85.5	200	4.51	
EXT DRO >C28-C36	<10.0	10.0	04/28/2023	ND					
Surrogate: 1-Chlorooctane	66.2	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	68.5	% 49.1-14	8						

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Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	04/28/2023	Sampling Date:	04/28/2023
Reported:	05/02/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW UNIT 118 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	237283	Sample Received By:	Shalyn Rodriguez
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: H - 3 (0-0.5') (H232097-11)

BTEX 8021B	mg/	′kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/28/2023	ND	2.02	101	2.00	0.732	
Toluene*	<0.050	0.050	04/28/2023	ND	2.05	103	2.00	0.898	
Ethylbenzene*	<0.050	0.050	04/28/2023	ND	2.07	103	2.00	0.422	
Total Xylenes*	<0.150	0.150	04/28/2023	ND	6.27	105	6.00	0.819	
Total BTEX	<0.300	0.300	04/28/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	104 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	′kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	05/01/2023	ND	448	112	400	3.64	
TPH 8015M	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	04/28/2023	ND	182	90.8	200	3.09	
DRO >C10-C28*	<10.0	10.0	04/28/2023	ND	171	85.5	200	4.51	
EXT DRO >C28-C36	<10.0	10.0	04/28/2023	ND					
Surrogate: 1-Chlorooctane	70.6	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	73.5	% 49.1-14	8						

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Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	04/28/2023	Sampling Date:	04/28/2023
Reported:	05/02/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW UNIT 118 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	237283	Sample Received By:	Shalyn Rodriguez
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: H - 4 (0-0.5') (H232097-12)

BTEX 8021B	mg/	′kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/28/2023	ND	2.02	101	2.00	0.732	
Toluene*	<0.050	0.050	04/28/2023	ND	2.05	103	2.00	0.898	
Ethylbenzene*	<0.050	0.050	04/28/2023	ND	2.07	103	2.00	0.422	
Total Xylenes*	<0.150	0.150	04/28/2023	ND	6.27	105	6.00	0.819	
Total BTEX	<0.300	0.300	04/28/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	104 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	′kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	05/01/2023	ND	448	112	400	3.64	
TPH 8015M	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	04/28/2023	ND	182	90.8	200	3.09	
DRO >C10-C28*	<10.0	10.0	04/28/2023	ND	171	85.5	200	4.51	
EXT DRO >C28-C36	<10.0	10.0	04/28/2023	ND					
Surrogate: 1-Chlorooctane	71.5	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	73.4	% 49.1-14	8						

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Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	04/28/2023	Sampling Date:	04/28/2023
Reported:	05/02/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW UNIT 118 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	237283	Sample Received By:	Shalyn Rodriguez
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: H - 5 (0-0.5') (H232097-13)

BTEX 8021B	mg,	/kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/28/2023	ND	2.02	101	2.00	0.732	
Toluene*	<0.050	0.050	04/28/2023	ND	2.05	103	2.00	0.898	
Ethylbenzene*	<0.050	0.050	04/28/2023	ND	2.07	103	2.00	0.422	
Total Xylenes*	<0.150	0.150	04/28/2023	ND	6.27	105	6.00	0.819	
Total BTEX	<0.300	0.300	04/28/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	104	% 71.5-13	4						
Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	05/01/2023	ND	448	112	400	3.64	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	04/28/2023	ND	212	106	200	7.65	
DRO >C10-C28*	<10.0	10.0	04/28/2023	ND	209	105	200	0.984	
EXT DRO >C28-C36	<10.0	10.0	04/28/2023	ND					
Surrogate: 1-Chlorooctane	78.0	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	81.8	% 49.1-14	8						

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Celez D. Keine

Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	04/28/2023	Sampling Date:	04/28/2023
Reported:	05/02/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW UNIT 118 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	237283	Sample Received By:	Shalyn Rodriguez
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: H - 6 (0-0.5') (H232097-14)

BTEX 8021B	mg/	′kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/29/2023	ND	1.81	90.7	2.00	10.5	
Toluene*	<0.050	0.050	04/29/2023	ND	1.83	91.3	2.00	10.6	
Ethylbenzene*	<0.050	0.050	04/29/2023	ND	1.80	89.8	2.00	11.9	
Total Xylenes*	<0.150	0.150	04/29/2023	ND	5.48	91.4	6.00	11.9	
Total BTEX	<0.300	0.300	04/29/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	102 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	′kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	05/01/2023	ND	448	112	400	3.64	
TPH 8015M	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	04/28/2023	ND	212	106	200	7.65	
DRO >C10-C28*	<10.0	10.0	04/28/2023	ND	209	105	200	0.984	
EXT DRO >C28-C36	<10.0	10.0	04/28/2023	ND					
Surrogate: 1-Chlorooctane	88.5	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	92.3	% 49.1-14	8						

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Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	04/28/2023	Sampling Date:	04/28/2023
Reported:	05/02/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW UNIT 118 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	237283	Sample Received By:	Shalyn Rodriguez
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: H - 7 (0-0.5') (H232097-15)

BTEX 8021B	mg,	′kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/29/2023	ND	1.81	90.7	2.00	10.5	
Toluene*	<0.050	0.050	04/29/2023	ND	1.83	91.3	2.00	10.6	
Ethylbenzene*	<0.050	0.050	04/29/2023	ND	1.80	89.8	2.00	11.9	
Total Xylenes*	<0.150	0.150	04/29/2023	ND	5.48	91.4	6.00	11.9	
Total BTEX	<0.300	0.300	04/29/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	103	% 71.5-13	4						
Chloride, SM4500Cl-B	mg,	′kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	05/01/2023	ND	448	112	400	3.64	
TPH 8015M	mg,	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	04/28/2023	ND	212	106	200	7.65	
DRO >C10-C28*	<10.0	10.0	04/28/2023	ND	209	105	200	0.984	
EXT DRO >C28-C36	<10.0	10.0	04/28/2023	ND					
Surrogate: 1-Chlorooctane	95.0	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	98.0	% 49.1-14	8						

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Celez D. Keine

Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	04/28/2023	Sampling Date:	04/28/2023
Reported:	05/02/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW UNIT 118 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	237283	Sample Received By:	Shalyn Rodriguez
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: H - 8 (0-0.5') (H232097-16)

BTEX 8021B	mg/	′kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/29/2023	ND	1.96	98.1	2.00	3.46	
Toluene*	<0.050	0.050	04/29/2023	ND	1.96	98.1	2.00	2.94	
Ethylbenzene*	<0.050	0.050	04/29/2023	ND	1.98	99.1	2.00	3.91	
Total Xylenes*	<0.150	0.150	04/29/2023	ND	6.11	102	6.00	4.71	
Total BTEX	<0.300	0.300	04/29/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	104 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	′kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	05/01/2023	ND	448	112	400	3.64	
TPH 8015M	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	04/28/2023	ND	212	106	200	7.65	
DRO >C10-C28*	<10.0	10.0	04/28/2023	ND	209	105	200	0.984	
EXT DRO >C28-C36	<10.0	10.0	04/28/2023	ND					
Surrogate: 1-Chlorooctane	85.7	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	87.5	% 49.1-14	8						

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Celey D. Keene, Lab Director/Quality Manager



Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C

Samples reported on an as received basis (wet) unless otherwise noted on report

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager

3 Helle		Notice: Signature of this document and relinquishment of samples constitutes a valid purchase order from client company to Xenco, its affiliates and subcontract of service. Xenco will be liable only for the cost of samples and shall not assume any responsibility for any losses or expenses incurred by the client if such loss of Xenco. A minimum charge of \$85.00 will be applied to each project and a charge of \$5 for each sample submitted to Xenco, but not analyzed. These terms will	1/2023 Additio	H-2 (0-0.5')	H-1 (0-0.5')	S-4 (1-1.5')	S-4 (0-0.5')	S-3 (1-1.5')	S-3 (0-0.5')	4 S-2 (1-1.5')	S-2 (0-0.5')	S-1 (1-1.5')	S-1 (0-0.5')	Sample Identification	Total Containers:	Sample Custody Seals:	Cooler Custody Seals:	Received Intact:	SAMPLE RECEIPT	PO #	Sampler's Name:	Project Location	Project Number:	Project Name:		City, State ZIP: 0	Address: 4		Project Manager: E	
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Sta		uishment of sam ost of samples an e applied to each	s:	4/28/2023	4/28/2023	4/28/2023	4/28/2023	4/28/2023	4/28/2023	4/28/2023	4/28/2023	4/28/2023	4/28/2023	Date		NO N/A	1	No	Temp Blank:	21149427	Kellan Smith	Eddy County, NM	237283	Cotton Draw Unit 118 Battery		8220	e	ental		-
XIAIQ	Received	ples constitute d shall not assu project and a c												Time	Corrected T	Temperature Reading:	Correction Factor:	Thermometer ID:	Yes No			D		attery						
Mer	Received by: (Signature)	s a valid purcha ume any respon harge of \$5 for		×	×	×	×	×	×	×	×	×	×	Soil	Corrected Temperature:	e Reading:	actor:	er ID:	Wet Ice:	lab, it rece	TAT starts the day received by the	Due Date:	Routine	Turn	Email:					
1	ure)	se order from sibility for any each sample s												Water	-0.0		r	15	100	lab, it received by 4:30pm	day received	48hr	✓ Rush	Turn Around		City, State ZIP:	Address:	Company Name:	Bill to: (if different)	
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20/26	Date	iy to Xenco, benses incui enco, but no			1 ×	1 x	1 ×	1 ×	1 ×	1 ×	1 x	1 ×	1 ×	# of Cont				X 80					de .	6	vn.com	Artes	6488	Devo	Wes	
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2 2		es and sul e client if s d. These te		×	×	×	×	×	×	×	×	×	×			c	hlo	ride	4500				-			38210	6488 Seven Rivers Highway	Y	ews	
	Relinqu	and subcontractors. It assigns standard terms and conditions lient if such losses are due to circumstances beyond the contro These terms will be enforced unless previously negotiated.		╟	+	+	\vdash	\vdash					-				-			-	-		+				ghway			
	ished b	rs. It assig are due to e enforced																						ANALY						
	Relinquished by: (Signature)	ors. It assigns standard terms and conditions es are due to circumstances beyond the control be enforced unless previously negotiated.		╟	-	+	-	-	-	\vdash	-	-	+										+	ANALYSIS REQUEST	L					
	ature)	rd terms a ances beyo priously ne																						QUEST	Delive	Report	oldle	Progra]
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														Sam		NaOH+Ascorbic Acid.	To Acotato Nan	Na C O . NaCO	H ₃ PO ₄ : HP	H ₂ SU ₄ : H ₂	HCL: HC	Cool: Cool	None: NO	Prese		Г		_βrownfieldsRRC	Work Order Comments	Page
	Dat													Sample Comments		nrhic Aci	NIDOH-	ABIS	5	N	: =	M	D	Preservative Codes	Other:					
	Date/Time													Iments	0.001	+ SAP	Zn			NaOH: Na	HNO3: HN	MeOH: Me	DI Water: H ₂ O	Code		Level		uperfund		of 2

Page 19 of 20

Chain of Custody

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(
			Rill to: (if different)	Wes	Weslev Mathews		Work Order	Work Order Comments
Project Manager: Etitali Sessuits	nmental		Company Name:	Dev	Devon Energy		Program: UST/PST PRP Brov	Brownfields RRC Duperfund
Address: 402 E Wood Ave	d Ave		Address:	6488	6488 Seven Rivers Highway	Highway		
te ZIP:	VM 88220		City, State ZIP:	Arte	Artesia, NM 88210			
	156	Email:	Wesley.Mathews@dvn.com	s@dvn.com			Deliverables: EDD L ADa	ADaP1 L Other:
Name:	Cotton Draw Unit 118 Battery		Turn Around			ANALYSIS REQUEST	QUEST	ervativ
ä	237283	Routi	マ Rush	Code				
	Eddy County, NM	Due Date:	48hr))			0
	Kellan Smith	TAT starts the o	TAT starts the day received by the		MRC			HCL: HC HNO3: HN H ₂ SO4: H ₂ NaOH: Na
	21149427	Vec No Wet Ice:	Yes No	eters				H ₃ PO ₄ : HP
Received Intact:		ete	E	'arar	RO +		НОЦІ	NaHSO4: NABIS
Cooler Custody Seals: Y	No. NA	Correction Factor:	-0.00	100				
Sample Custody Seals: Y Total Containers:	Yes No NA Te	Corrected Temperature:	-0.92		8015			NaOH+Ascorbic Acid: SAPC
Sample Identification	Date	Time Soil	Water Comp	# of Cont	TPI			Sample Comments
// H-3 (0-0.5')	4/28/2023	×	Grab	1 x	x x			
H-4 (0-0.5')	4/28/2023	×	Grab	+	×			
/3 H-5 (0-0.5')	4/28/2023	×	GIAD	+	,			
/Y H-6 (0-0.5')	4/28/2023	×	Giab	+	+			
/S H-7 (0-0.5')	4/28/2023	< >	Grab		× ;			
9:25								
9:5					_			
Additional Comments:	nents:							
Notice: Signature of this document and relinquishment of samples constitutes a valid purchase order from client company to Xenco, its affiliates and subcontractors. It assigns standard terms and conditions for service: Xenco will be liable only for the cost of samples and shall not assume any responsibility for any losses or expenses incurred by the client if such losses are due to circumstances beyond the contro of service. Xenco will be liable only for the cost of samples and shall not assume any responsibility for any losses or expenses incurred by the client if such losses are due to circumstances beyond the contro of service. Xenco will be liable only for the cost of samples and shall not assume any responsibility for any losses or expenses incurred by the client if such losses are due to circumstances beyond the contro of service. Xenco will be able to a solid to each project and a charge of \$5 for each sample submitted to Xenco, but not analyzed. These terms will be enforced unless previously negotiated.	d relinquishment of samples r the cost of samples and sh	s constitutes a valid purcha nall not assume any respon	ise order from client c isibility for any losses each sample submitte	ompany to Xenco or expenses inco of to Xenco, but r	o, its affiliates and urred by the client not analyzed. Thes	subcontractors. It assigns standard terms and condi if such losses are due to circumstances beyond the c se terms will be enforced unless previously negotiated	ors. It assigns standard terms and conditions es are due to circumstances beyond the control be enforced unless previously negotiated.	
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Chain of Custody

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June 21, 2023

ETHAN SESSUMS NTG ENVIRONMENTAL 701 TRADEWINDS BLVD. SUITE C MIDLAND, TX 79706

RE: COTTON DRAW 118

Enclosed are the results of analyses for samples received by the laboratory on 06/20/23 14:47.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/ga/lab_accred_certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keine

Celey D. Keene Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	06/20/2023	Sampling Date:	06/20/2023
Reported:	06/21/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW 118	Sampling Condition:	Cool & Intact
Project Number:	236728	Sample Received By:	Shari Cisneros
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: CS - 1 (1') (H233199-01)

BTEX 8021B	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/21/2023	ND	2.09	104	2.00	0.581	
Toluene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	1.56	
Ethylbenzene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	0.144	
Total Xylenes*	<0.150	0.150	06/21/2023	ND	7.06	118	6.00	0.201	
Total BTEX	<0.300	0.300	06/21/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	104	% 71.5-13	4						
Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	144	16.0	06/21/2023	ND	400	100	400	0.00	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/21/2023	ND	236	118	200	27.0	
DRO >C10-C28*	<10.0	10.0	06/21/2023	ND	206	103	200	24.0	
EXT DRO >C28-C36	<10.0	10.0	06/21/2023	ND					
Surrogate: 1-Chlorooctane	116 9	48.2-13	4						
Surrogate: 1-Chlorooctadecane	120	% 49.1-14	8						

Cardinal Laboratories

*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	06/20/2023	Sampling Date:	06/20/2023
Reported:	06/21/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW 118	Sampling Condition:	Cool & Intact
Project Number:	236728	Sample Received By:	Shari Cisneros
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: CS - 2 (1') (H233199-02)

BTEX 8021B	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/21/2023	ND	2.09	104	2.00	0.581	
Toluene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	1.56	
Ethylbenzene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	0.144	
Total Xylenes*	<0.150	0.150	06/21/2023	ND	7.06	118	6.00	0.201	
Total BTEX	<0.300	0.300	06/21/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	104 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	'kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	06/21/2023	ND	400	100	400	0.00	
TPH 8015M	mg/	'kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/21/2023	ND	236	118	200	27.0	
DRO >C10-C28*	<10.0	10.0	06/21/2023	ND	206	103	200	24.0	
EXT DRO >C28-C36	<10.0	10.0	06/21/2023	ND					
Surrogate: 1-Chlorooctane	107 9	48.2-13	4						
Surrogate: 1-Chlorooctadecane	109 9	% 49.1-14	8						

Cardinal Laboratories

*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	06/20/2023	Sampling Date:	06/20/2023
Reported:	06/21/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW 118	Sampling Condition:	Cool & Intact
Project Number:	236728	Sample Received By:	Shari Cisneros
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: CS - 3 (1') (H233199-03)

BTEX 8021B	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/21/2023	ND	2.09	104	2.00	0.581	
Toluene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	1.56	
Ethylbenzene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	0.144	
Total Xylenes*	<0.150	0.150	06/21/2023	ND	7.06	118	6.00	0.201	
Total BTEX	<0.300	0.300	06/21/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	103	% 71.5-13	4						
Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	06/21/2023	ND	400	100	400	0.00	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/21/2023	ND	236	118	200	27.0	
DRO >C10-C28*	<10.0	10.0	06/21/2023	ND	206	103	200	24.0	
EXT DRO >C28-C36	<10.0	10.0	06/21/2023	ND					
Surrogate: 1-Chlorooctane	105	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	107	% 49.1-14	8						

Cardinal Laboratories

*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	06/20/2023	Sampling Date:	06/20/2023
Reported:	06/21/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW 118	Sampling Condition:	Cool & Intact
Project Number:	236728	Sample Received By:	Shari Cisneros
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: CS - 4 (1') (H233199-04)

BTEX 8021B	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/21/2023	ND	2.09	104	2.00	0.581	
Toluene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	1.56	
Ethylbenzene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	0.144	
Total Xylenes*	<0.150	0.150	06/21/2023	ND	7.06	118	6.00	0.201	
Total BTEX	<0.300	0.300	06/21/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	103 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	′kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	06/21/2023	ND	400	100	400	0.00	
TPH 8015M	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/21/2023	ND	236	118	200	27.0	
DRO >C10-C28*	<10.0	10.0	06/21/2023	ND	206	103	200	24.0	
EXT DRO >C28-C36	<10.0	10.0	06/21/2023	ND					
Surrogate: 1-Chlorooctane	123 9	48.2-13	4						
Surrogate: 1-Chlorooctadecane	126 9	% 49.1-14	8						

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	06/20/2023	Sampling Date:	06/20/2023
Reported:	06/21/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW 118	Sampling Condition:	Cool & Intact
Project Number:	236728	Sample Received By:	Shari Cisneros
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: CS - 5 (1') (H233199-05)

BTEX 8021B	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/21/2023	ND	2.09	104	2.00	0.581	
Toluene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	1.56	
Ethylbenzene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	0.144	
Total Xylenes*	<0.150	0.150	06/21/2023	ND	7.06	118	6.00	0.201	
Total BTEX	<0.300	0.300	06/21/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	103 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	208	16.0	06/21/2023	ND	400	100	400	0.00	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/21/2023	ND	167	83.7	200	0.0359	
DRO >C10-C28*	<10.0	10.0	06/21/2023	ND	176	88.1	200	2.72	
EXT DRO >C28-C36	<10.0	10.0	06/21/2023	ND					
Surrogate: 1-Chlorooctane	97.1	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	120 \$	% 49.1-14	8						

Cardinal Laboratories

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	06/20/2023	Sampling Date:	06/20/2023
Reported:	06/21/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW 118	Sampling Condition:	Cool & Intact
Project Number:	236728	Sample Received By:	Shari Cisneros
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: CS - 6 (1') (H233199-06)

BTEX 8021B	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/21/2023	ND	2.09	104	2.00	0.581	
Toluene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	1.56	
Ethylbenzene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	0.144	
Total Xylenes*	<0.150	0.150	06/21/2023	ND	7.06	118	6.00	0.201	
Total BTEX	<0.300	0.300	06/21/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	103 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	06/21/2023	ND	400	100	400	0.00	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/21/2023	ND	167	83.7	200	0.0359	
DRO >C10-C28*	<10.0	10.0	06/21/2023	ND	176	88.1	200	2.72	
EXT DRO >C28-C36	<10.0	10.0	06/21/2023	ND					
Surrogate: 1-Chlorooctane	102 9	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	125 9	% 49.1-14	8						

Cardinal Laboratories

*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	06/20/2023	Sampling Date:	06/20/2023
Reported:	06/21/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW 118	Sampling Condition:	Cool & Intact
Project Number:	236728	Sample Received By:	Shari Cisneros
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: CS - 7 (1') (H233199-07)

BTEX 8021B	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/21/2023	ND	2.09	104	2.00	0.581	
Toluene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	1.56	
Ethylbenzene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	0.144	
Total Xylenes*	<0.150	0.150	06/21/2023	ND	7.06	118	6.00	0.201	
Total BTEX	<0.300	0.300	06/21/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	99.4	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	'kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	06/21/2023	ND	400	100	400	0.00	
TPH 8015M	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/21/2023	ND	167	83.7	200	0.0359	
DRO >C10-C28*	<10.0	10.0	06/21/2023	ND	176	88.1	200	2.72	
EXT DRO >C28-C36	<10.0	10.0	06/21/2023	ND					
Surrogate: 1-Chlorooctane	104 9	48.2-13	4						
Surrogate: 1-Chlorooctadecane	129 9	% 49.1-14	8						

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	06/20/2023	Sampling Date:	06/20/2023
Reported:	06/21/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW 118	Sampling Condition:	Cool & Intact
Project Number:	236728	Sample Received By:	Shari Cisneros
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: CS - 8 (1') (H233199-08)

BTEX 8021B	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/21/2023	ND	2.09	104	2.00	0.581	
Toluene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	1.56	
Ethylbenzene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	0.144	
Total Xylenes*	<0.150	0.150	06/21/2023	ND	7.06	118	6.00	0.201	
Total BTEX	<0.300	0.300	06/21/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	104 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	06/21/2023	ND	400	100	400	0.00	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/21/2023	ND	167	83.7	200	0.0359	
DRO >C10-C28*	<10.0	10.0	06/21/2023	ND	176	88.1	200	2.72	
EXT DRO >C28-C36	<10.0	10.0	06/21/2023	ND					
Surrogate: 1-Chlorooctane	103 9	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	125 9	% 49.1-14	8						

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	06/20/2023	Sampling Date:	06/20/2023
Reported:	06/21/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW 118	Sampling Condition:	Cool & Intact
Project Number:	236728	Sample Received By:	Shari Cisneros
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: SW - 1 (0-1') (H233199-09)

BTEX 8021B	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/21/2023	ND	2.09	104	2.00	0.581	
Toluene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	1.56	
Ethylbenzene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	0.144	
Total Xylenes*	<0.150	0.150	06/21/2023	ND	7.06	118	6.00	0.201	
Total BTEX	<0.300	0.300	06/21/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	103 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	384	16.0	06/21/2023	ND	400	100	400	0.00	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/21/2023	ND	167	83.7	200	0.0359	
DRO >C10-C28*	<10.0	10.0	06/21/2023	ND	176	88.1	200	2.72	
EXT DRO >C28-C36	<10.0	10.0	06/21/2023	ND					
Surrogate: 1-Chlorooctane	109 9	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	139 9	% 49.1-14	8						

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Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	06/20/2023	Sampling Date:	06/20/2023
Reported:	06/21/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW 118	Sampling Condition:	Cool & Intact
Project Number:	236728	Sample Received By:	Shari Cisneros
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: SW - 2 (0-1') (H233199-10)

BTEX 8021B	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/21/2023	ND	2.09	104	2.00	0.581	
Toluene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	1.56	
Ethylbenzene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	0.144	
Total Xylenes*	<0.150	0.150	06/21/2023	ND	7.06	118	6.00	0.201	
Total BTEX	<0.300	0.300	06/21/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	103 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	06/21/2023	ND	400	100	400	0.00	
TPH 8015M	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/21/2023	ND	167	83.7	200	0.0359	
DRO >C10-C28*	<10.0	10.0	06/21/2023	ND	176	88.1	200	2.72	
EXT DRO >C28-C36	<10.0	10.0	06/21/2023	ND					
Surrogate: 1-Chlorooctane	102 9	48.2-13	4						
Surrogate: 1-Chlorooctadecane	128 9	% 49.1-14	8						

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	06/20/2023	Sampling Date:	06/20/2023
Reported:	06/21/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW 118	Sampling Condition:	Cool & Intact
Project Number:	236728	Sample Received By:	Shari Cisneros
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: SW - 3 (0-1') (H233199-11)

BTEX 8021B	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/21/2023	ND	2.09	104	2.00	0.581	
Toluene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	1.56	
Ethylbenzene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	0.144	
Total Xylenes*	<0.150	0.150	06/21/2023	ND	7.06	118	6.00	0.201	
Total BTEX	<0.300	0.300	06/21/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	103	% 71.5-13	4						
Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	208	16.0	06/21/2023	ND	400	100	400	0.00	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/21/2023	ND	167	83.7	200	0.0359	
DRO >C10-C28*	<10.0	10.0	06/21/2023	ND	176	88.1	200	2.72	
EXT DRO >C28-C36	<10.0	10.0	06/21/2023	ND					
Surrogate: 1-Chlorooctane	101	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	123	% 49.1-14	8						

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Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	06/20/2023	Sampling Date:	06/20/2023
Reported:	06/21/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW 118	Sampling Condition:	Cool & Intact
Project Number:	236728	Sample Received By:	Shari Cisneros
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: SW - 4 (0-1') (H233199-12)

BTEX 8021B	mg/	′kg	Analyze	ed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/21/2023	ND	2.09	104	2.00	0.581	
Toluene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	1.56	
Ethylbenzene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	0.144	
Total Xylenes*	<0.150	0.150	06/21/2023	ND	7.06	118	6.00	0.201	
Total BTEX	<0.300	0.300	06/21/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	103 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	′kg	Analyze	ed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	06/21/2023	ND	400	100	400	0.00	
TPH 8015M	mg/	′kg	Analyze	ed By: MS					S-04
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/21/2023	ND	167	83.7	200	0.0359	
DRO >C10-C28*	<10.0	10.0	06/21/2023	ND	176	88.1	200	2.72	
EXT DRO >C28-C36	<10.0	10.0	06/21/2023	ND					
Surrogate: 1-Chlorooctane	142 9	48.2-13	4						
Surrogate: 1-Chlorooctadecane	162 9	% 49.1-14	8						

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Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	06/20/2023	Sampling Date:	06/20/2023
Reported:	06/21/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW 118	Sampling Condition:	Cool & Intact
Project Number:	236728	Sample Received By:	Shari Cisneros
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: SW - 5 (0-1') (H233199-13)

BTEX 8021B	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/21/2023	ND	2.09	104	2.00	0.581	
Toluene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	1.56	
Ethylbenzene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	0.144	
Total Xylenes*	<0.150	0.150	06/21/2023	ND	7.06	118	6.00	0.201	
Total BTEX	<0.300	0.300	06/21/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	104 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	06/21/2023	ND	400	100	400	0.00	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/21/2023	ND	167	83.7	200	0.0359	
DRO >C10-C28*	<10.0	10.0	06/21/2023	ND	176	88.1	200	2.72	
EXT DRO >C28-C36	<10.0	10.0	06/21/2023	ND					
Surrogate: 1-Chlorooctane	103 9	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	126 9	% 49.1-14	8						

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	06/20/2023	Sampling Date:	06/20/2023
Reported:	06/21/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW 118	Sampling Condition:	Cool & Intact
Project Number:	236728	Sample Received By:	Shari Cisneros
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: SW - 6 (0-1') (H233199-14)

BTEX 8021B	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/21/2023	ND	2.09	104	2.00	0.581	
Toluene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	1.56	
Ethylbenzene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	0.144	
Total Xylenes*	<0.150	0.150	06/21/2023	ND	7.06	118	6.00	0.201	
Total BTEX	<0.300	0.300	06/21/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	103 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	06/21/2023	ND	400	100	400	0.00	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/21/2023	ND	167	83.7	200	0.0359	
DRO >C10-C28*	<10.0	10.0	06/21/2023	ND	176	88.1	200	2.72	
EXT DRO >C28-C36	<10.0	10.0	06/21/2023	ND					
Surrogate: 1-Chlorooctane	107 9	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	125 9	% 49.1-14	8						

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Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	06/20/2023	Sampling Date:	06/20/2023
Reported:	06/21/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW 118	Sampling Condition:	Cool & Intact
Project Number:	236728	Sample Received By:	Shari Cisneros
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: SW - 7 (0-1') (H233199-15)

BTEX 8021B	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/21/2023	ND	2.09	104	2.00	0.581	
Toluene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	1.56	
Ethylbenzene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	0.144	
Total Xylenes*	<0.150	0.150	06/21/2023	ND	7.06	118	6.00	0.201	
Total BTEX	<0.300	0.300	06/21/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	103	% 71.5-13	4						
Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	06/21/2023	ND	400	100	400	0.00	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/21/2023	ND	167	83.7	200	0.0359	
DRO >C10-C28*	<10.0	10.0	06/21/2023	ND	176	88.1	200	2.72	
EXT DRO >C28-C36	<10.0	10.0	06/21/2023	ND					
Surrogate: 1-Chlorooctane	106	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	124	% 49.1-14	8						

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



NTG ENVIRONMENTAL ETHAN SESSUMS 701 TRADEWINDS BLVD. SUITE C MIDLAND TX, 79706 Fax To:

Received:	06/20/2023	Sampling Date:	06/20/2023
Reported:	06/21/2023	Sampling Type:	Soil
Project Name:	COTTON DRAW 118	Sampling Condition:	Cool & Intact
Project Number:	236728	Sample Received By:	Shari Cisneros
Project Location:	DEVON - EDDY COUNTY, NM		

Sample ID: SW - 8 (0-1') (H233199-16)

BTEX 8021B	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/21/2023	ND	2.09	104	2.00	0.581	
Toluene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	1.56	
Ethylbenzene*	<0.050	0.050	06/21/2023	ND	2.32	116	2.00	0.144	
Total Xylenes*	<0.150	0.150	06/21/2023	ND	7.06	118	6.00	0.201	
Total BTEX	<0.300	0.300	06/21/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	103 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	06/21/2023	ND	400	100	400	0.00	
TPH 8015M	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/21/2023	ND	167	83.7	200	0.0359	
DRO >C10-C28*	<10.0	10.0	06/21/2023	ND	176	88.1	200	2.72	
EXT DRO >C28-C36	<10.0	10.0	06/21/2023	ND					
Surrogate: 1-Chlorooctane	102 9	48.2-13	4						
Surrogate: 1-Chlorooctadecane	120 9	% 49.1-14	8						

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Celey D. Keene, Lab Director/Quality Manager



Notes and Definitions

S-04	The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
QR-04	The RPD for the BS/BSD was outside of historical limits.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C
	Samples reported on an as received basis (wet) unless otherwise noted on report

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



Received by OCD 7/11/2023 9:59:25 AM

Page 77 of 79

runnae winasseveri strail or elemetro Waved unless made in writing and received by Cutinal within 30 days after completion of the appliquental damages, including when by cardinal, regardless of whether such claim is based upon any of the above state(-, -, -, -, -, -, -, -, -, -, -, -, -, -	PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or fort, shall be limited to the amount paid by the client for the	2 m-2 10:201	4 C A A A A A A A A A A A A A A A A A A	GRAB OR (C)OMP # CONTAINERS GROUNDWATER WASTEWATER SOIL OIL SLUDGE OTHER : ACID/BASE: ICE / COOL OTHER : ME THE TME TME Chlosibe B TV	MATRIX PRESERV. SAMPLING	C Why bay Fax #:	State: Zip:	Phone #: 23 4 - 246 - 5456 Fax #: Address:	State: Nim Zip: 88220	Mc Kay St . Company:	Ethen Sessions P.O. # PILL IC	
Image: Ves No Add'l Phone #: emailed. Please provide Email address: Image: Ves Please p				P (15X				-			ANALYSIS REQUEST	

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:		
DEVON ENERGY PRODUCTION COMPANY, LP	6137		
333 West Sheridan Ave.	Action Number:		
Oklahoma City, OK 73102	238416		
	Action Type:		
	[C-141] Release Corrective Action (C-141)		

CONDITIONS

Created By	Condition	Condition Date
crystal.walker	Closure Report Approved	3/12/2024
crystal.walker	Operator failed to provide proper Sampling Notification pursuant to 19.15.29.12.D.(1).(a) NMAC. Failure to provide proper sampling notice is a compliance issue and OCD may pursue compliance actions pursuant to 19.15.5 NMAC. Operator shall ensure future compliance with 19.15.29.12.D. (1).(a) NMAC	3/12/2024

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