



January 19, 2024

New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**Re: Deferral Request
Brantley Fee BS Pad
Incident Number nAPP2329739162
Eddy County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of Kaiser-Francis Oil Company (Kaiser-Francis), has prepared this *Deferral Request* to document assessment and soil sampling activities performed at the Brantley Fee BS Pad (Site) in Unit L, Section 24, Township 23 South, Range 28 East, in Eddy County, New Mexico (Figure 1). The purpose of the Site assessment and soil sampling activities was to assess for the presence or absence of impacts to soil resulting from a release of produced water within lined containment at the Site. Based on field observations, field screening activities, and laboratory analytical results, Kaiser-Francis is submitting this *Deferral Request* and requesting deferral of remediation for Incident Number nAPP2329739162 until major Site reconstruction or the plugging and abandonment of the well and subsequent reclamation of the affected area.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Eddy County, New Mexico (32.288671°, -104.048667°) and is associated with oil and gas exploration and production operations on private land.

On October 23, 2023, Kaiser-Francis personnel discovered a tank fire, which resulted in the release of 1 barrel (bbl) of produced water inside the lined secondary containment. A vacuum truck was immediately dispatched to the Site to recover free-standing fluids, and 1 bbl of produced water was recovered. Kaiser-Francis reported the release to the New Mexico Oil Conservation Division (NMOCD) on a Release Notification Form C-141 (Form C-141) on November 3, 2023. The release was assigned Incident Number nAPP2329739162. A 48-hour advance notice of liner inspection was provided via email to the NMOCD office on November 11, 2023. A liner integrity inspection was conducted by Ensolum personnel on November 15, 2023, and the liner was deemed insufficient.

SITE CHARACTERIZATION AND CLOSURE CRITERIA

The Site was characterized to assess applicability of Table I, Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29 (19.15.29) of the New Mexico Administrative Code (NMAC). Results from the characterization desktop review are presented on page 3 of the Form C-141, Site Assessment/Characterization for both releases, see Appendix A. Potential Site receptors are identified on Figure 1.

According to the New Mexico Office of the State Engineer (NMOSE), the closest permitted groundwater well with depth to groundwater data is C 03146, located approximately 0.21 miles north of the Site. The

well had a reported depth to groundwater of 36 feet below ground surface (bgs) and a total depth of 82 feet bgs. There are no regional or Site-specific hydrogeological conditions, such as shallow surface water, karst features, wetlands, or vegetation to suggest the Site is conducive to shallower groundwater. All wells used for depth to groundwater determination are presented on Figure 1. The referenced well record is included in Appendix B.

The closest continuously flowing or significant watercourse to the Site is a dry wash, located 210 feet southeast of the Site. The Site is greater than 200 feet from a lakebed, sinkhole, or playa lake and greater than 300 feet from an occupied residence, school, hospital, institution, church, or wetland. The Site is greater than 1,000 feet to a freshwater well or spring and is not within a 100-year floodplain or overlying a subsurface mine. The Site is not underlain by unstable geology (medium potential karst designation area). Site receptors are identified on Figure 1.

Based on the results of the Site Characterization, the following NMOCD Table I Closure Criteria (Closure Criteria) apply:

- Benzene: 10 milligrams per kilogram (mg/kg)
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg
- Total petroleum hydrocarbons (TPH)-gasoline range organics (GRO), TPH-diesel range organics (DRO), and TPH-oil range organics (ORO): 100 mg/kg
- Chloride: 600 mg/kg

SITE ASSESSMENT ACTIVITIES

On November 15, 2023, Site assessment activities were conducted to evaluate the release extent based on information provided on the Form C-141 and visual observations. Ensolum personnel completed a liner integrity inspection, and it was determined the liner was not completely intact. One single 0.5-inch cut in the containment liner was discovered during the inspection. The hole is located between 4 production tanks and under process piping. Four lateral delineation samples (SS01 through SS04) were collected around the lined containment at ground surface to confirm the release remained inside the lined secondary containment.

On December 19, 2023, Ensolum personnel completed vertical delineation sampling beneath the containment liner. One borehole (BH01) was advanced via hand auger to a depth of 2 ft bgs to assess for potential impacts related to the release. Soil from the delineation samples was field screened for TPH utilizing a calibrated PetroFLAG® soil analyzer system and chloride using Hach® chloride QuanTab® test strips. The delineation soil sample locations are depicted on Figure 2. Photographs were taken during the liner integrity inspection and during soil sampling activities and a photographic log is included in Appendix C. Observations for borehole (BH01) were documented on a Lithologic / Soil Sampling Log, which is presented in Appendix D.

All soil samples were placed directly into pre-cleaned glass jars, labeled with the location, date, time, sampler name, method of analysis, and immediately placed on ice. The soil samples were transported under strict chain-of-custody procedures to Envirotech Analytical Laboratory (Envirotech) in Farmington, New Mexico, for analysis of the following chemicals of concern (COCs): BTEX following United States Environmental Protection Agency (EPA) Method 8021B; TPH-GRO, TPH-DRO, and TPH- ORO following EPA Method 8015M/D; and chloride following EPA Method 300.0.

LABORATORY ANALYTICAL RESULTS

Laboratory analytical results for soil samples (SS01 through SS04), collected outside of the lined secondary containment, were all in compliance with the strictest Closure Criteria per NMOCD Table I. Laboratory analytical results indicated the concentration of chloride exceeded the strictest Closure Criteria at surface in sample location (BH01), collected beneath the containment liner. Vertical soil samples collected from BH01 at 0.5 feet through 2 feet bgs were all in compliance with the strictest Closure Criteria per NMOCD Table I. All laboratory analytical results are summarized in Table 1 and the complete laboratory analytical reports are included as Appendix E.

DEFERRAL REQUEST

Kaiser-Francis is requesting deferral of final remediation due to the presence of active production equipment and surface pipelines within the lined containment. Impacted soil is limited to the area immediately beneath the lined containment and active production equipment, where remediation would require a major facility deconstruction.

Impacted soil remaining in place beneath the liner, which is delineated vertically by delineation soil sample (BH01), confirmed to be in compliance with the strictest Closure Criteria at 0.5 feet bgs, and laterally by surface soil samples (SS01 through SS04), collected at the ground surface. A maximum of 200 cubic yards of chloride impacted soil remains in place beneath the liner assuming a maximum 0.5-foot depth based on the delineation soil samples listed above. Impacted soil volumes estimate include waste-containing soil volumes to be addressed through reconstruction of the containment or final pad reclamation.

Kaiser-Francis does not believe deferment will result in imminent risk to human health, the environment, or groundwater. Depth to groundwater was determined to be 36 feet bgs, the release was contained laterally by the lined containment, and the impacted soil remaining in place is limited to the area immediately beneath the liner. The liner has been repaired by Kaiser-Francis and will restrict future vertical migration of residual impacts and any interactions with humans and/or wildlife.

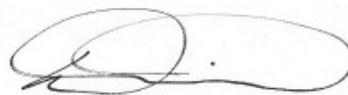
Based on the presence of active production equipment within the release area and the complete lateral and vertical delineation of impacted soil remaining in place, Kaiser-Francis requests deferral of final remediation for Incident Number nAPP2329739162 until final reclamation of the well pad or major construction, whichever comes first. Remedial actions completed to date have been protective of human health, the environment, and groundwater and deferment of impacted soil beneath the lined containment appears to be equally protective and warranting deferment. Notifications submitted to the NMOCD are included in Appendix F.

If you have any questions or comments, please contact Ms. Ashley Giovengo at (575) 988-0055 or agiovengo@ensolum.com.

Sincerely,
Ensolum, LLC



Ashley Giovengo
Senior Engineer



Daniel R. Moir, PG
Senior Managing Geologist

Brantley Fee BS Pad



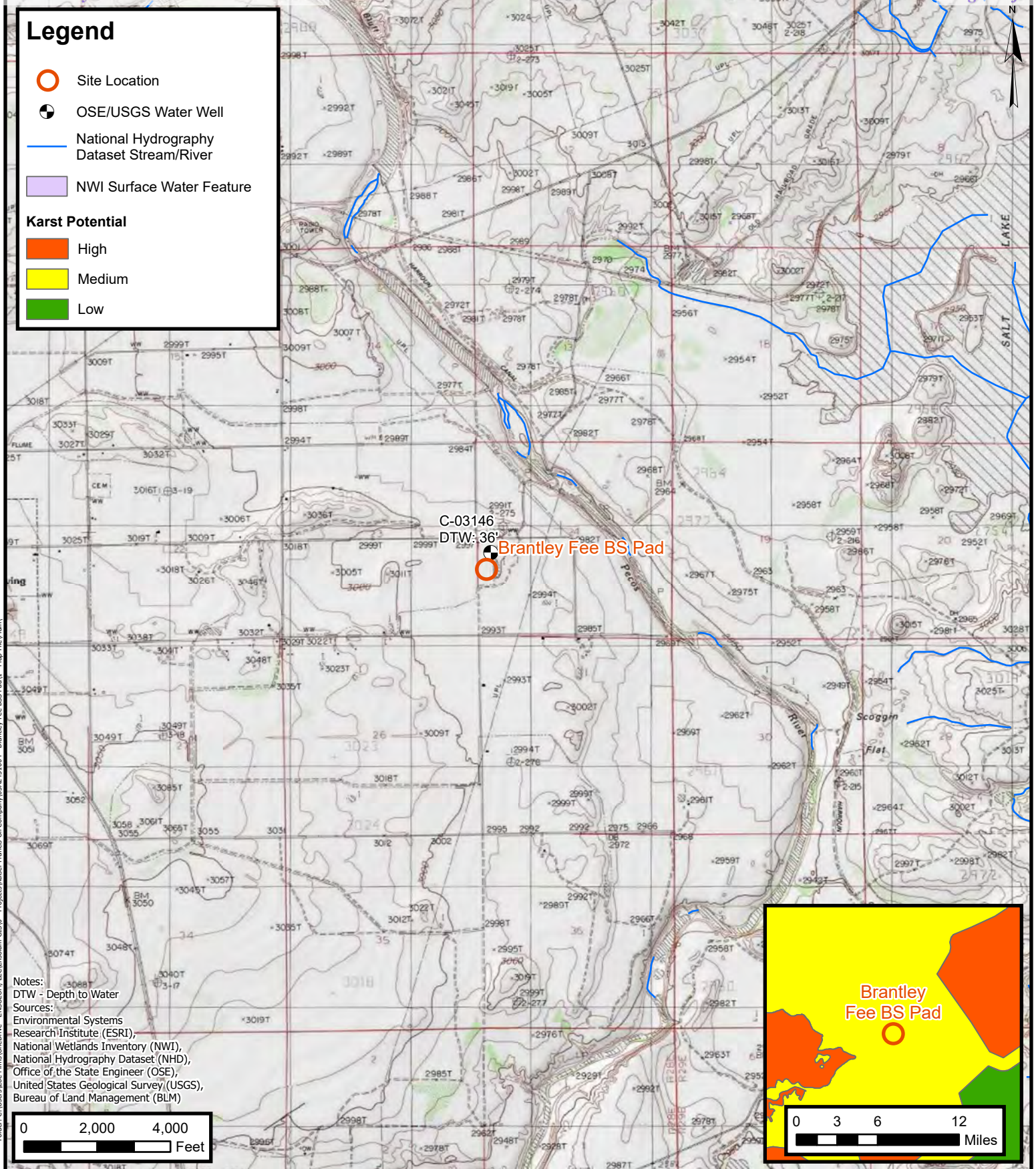
cc: Hutton Andrew, Kaiser-Francis Oil Company

Appendices:

Figure 1	Site Receptor Map
Figure 2	Delineation Soil Sample Locations
Table 1	Soil Sample Analytical Results
Appendix A	Form C-141
Appendix B	Referenced Well Records
Appendix C	Photographic Log
Appendix D	Lithologic Soil Sampling Logs
Appendix E	Laboratory Analytical Reports & Chain-of-Custody Documentation
Appendix F	NMOCD Correspondence



FIGURES



ENSOLUM
Environmental, Engineering and
Hydrogeologic Consultants

Site Receptor Map
Kaiser Francis Oil Company
Brantley Fee BS Pad
Incident Number: NAPP2329739162
Unit L, Section 24, Township 23S, Range 28E
Eddy County, New Mexico

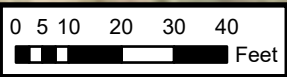
FIGURE
1

Legend

- Delineation Soil Sample in Compliance with Closure Criteria
- Delineation Soil Sample with Exceedences not in Compliance with Closure Criteria
- Containment Area



Notes:
Sample ID @ Depth Below Ground Surface.
Samples in bold indicate sample exceeded applicable closure criteria.



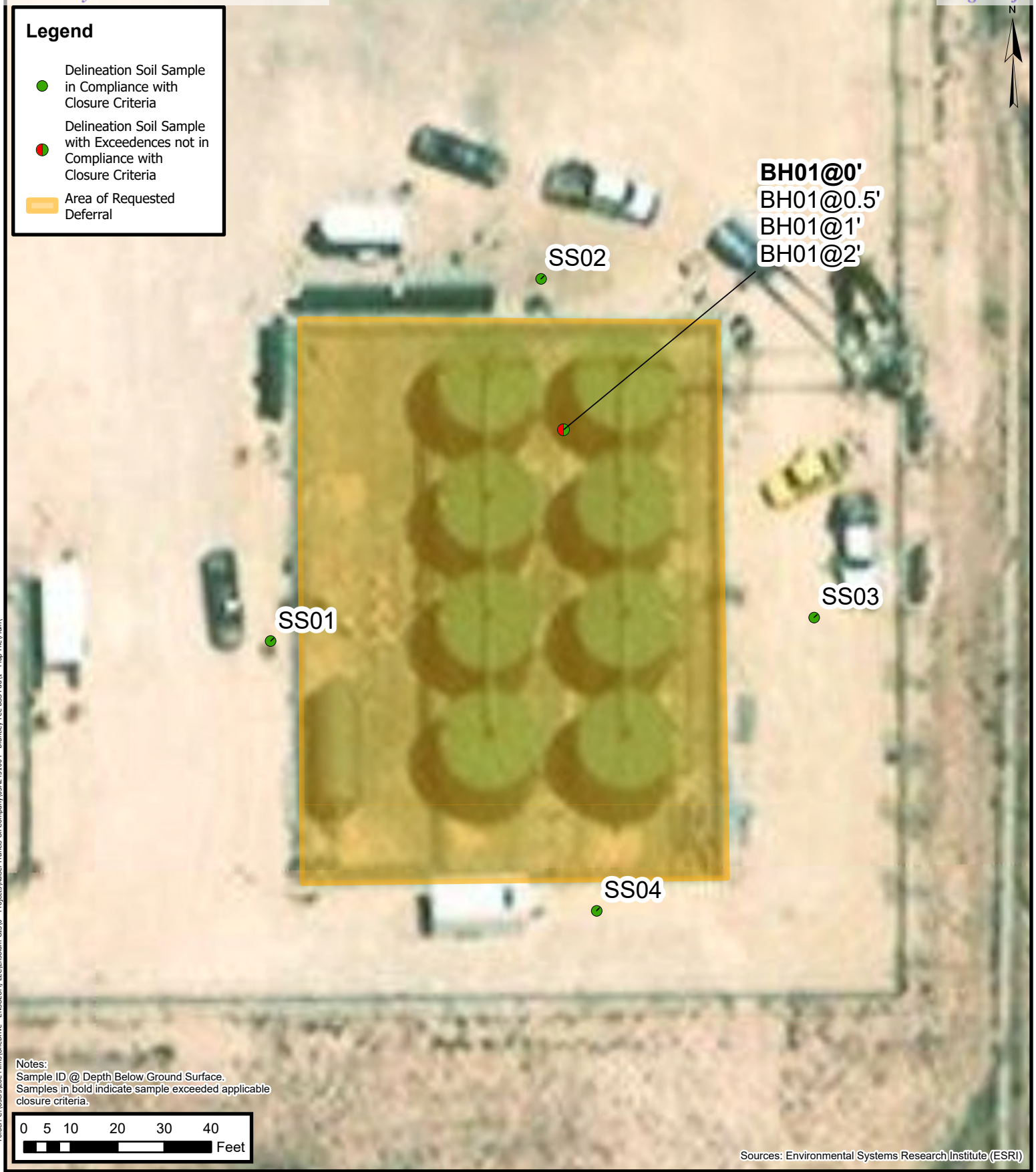
Sources: Environmental Systems Research Institute (ESRI)



Delineation Soil Sample Locations

Kaiser Francis Oil Company
Brantley Fee BS Pad
Incident Number: NAPP2329739162
Unit L, Section 24, Township 23S, Range 28E
Eddy County, New Mexico

FIGURE
2



Area of Requested Deferral

Kaiser Francis Oil Company
Brantley Fee BS Pad
Incident Number: NAPP2329739162
Unit L, Section 24, Township 23S, Range 28E
Eddy County, New Mexico

FIGURE

3





TABLES



TABLE 1
SOIL SAMPLE ANALYTICAL RESULTS

Brantley Fee BS Pad
Kaiser Francis Oil Company
Eddy County, New Mexico

Sample Designation	Date	Depth (feet bgs)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)	TPH ORO (mg/kg)	GRO+DRO (mg/kg)	Total TPH (mg/kg)	Chloride (mg/kg)
NMOCD Table I Closure Criteria (NMAC 19.15.29)			10	50	NE	NE	NE	NE	100	600
Delineation Soil Samples										
SS01	11/15/2023	0	<0.0250	<0.0250	<20.0	<25.0	<50.0	<25.0	<20.0	147
SS02	11/15/2023	0	<0.0250	<0.0250	<20.0	<25.0	<50.0	<25.0	<20.0	565
SS03	11/15/2023	0	<0.0250	<0.0250	<20.0	<25.0	<50.0	<25.0	<20.0	<200
SS04	11/15/2023	0	<0.0250	<0.0250	<20.0	<25.0	<50.0	<25.0	<20.0	317
BH01	12/19/2023	0	<0.0250	<0.0250	<20.0	<25.0	<50.0	<25.0	<20.0	922
BH01	12/19/2023	0.5	<0.0250	<0.0250	<20.0	<25.0	<50.0	<25.0	<20.0	438
BH01	12/19/2023	1	<0.0250	<0.0250	<20.0	<25.0	<50.0	<25.0	<20.0	46.4
BH01	12/19/2023	2	<0.0250	<0.0250	<20.0	<25.0	<50.0	<25.0	<20.0	73.7

Notes:

bgs: below ground surface

mg/kg: milligrams per kilogram

NMOCD: New Mexico Oil Conservation Division

NMAC: New Mexico Administrative Code

Grey text represents samples that have been excavated

<": Laboratory Analytical result is less than reporting limit

Concentrations in **bold** exceed the NMOCD Table I Closure Criteria or reclamation standard where applicable.

* Indicates sample was collected in area to be reclaimed after remediation is complete; reclamation for chloride in the top 4 feet is 600 mg/kg and total TPH is 100 mg/kg.

GRO: Gasoline Range Organics

DRO: Diesel Range Organics

ORO: Oil Range Organics

TPH: Total Petroleum Hydrocarbon

BTEX: Benzene, Toluene, Ethylbenzene, and Xylenes



APPENDIX A

Form 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

Incident ID	NAPP2329739162
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party Kaiser Francis Oil Company	OGRID 12361
Contact Name Hutton Andrew	Contact Telephone (918) 494-0000
Contact email huttona@kfoc.net	Incident # (assigned by OCD)
Contact mailing address 6733 S. Yale Tulsa, Oklahoma	

Location of Release Source

Latitude 32.288671

Longitude -104.048667

(NAD 83 in decimal degrees to 5 decimal places)

Site Name Brantley Fee BSS Pad	Site Type Oil Well Pad
Date Release Discovered 10/23/2023	API# (if applicable)

Unit Letter	Section	Township	Range	County
L	24	23S	28E	Eddy

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) 1 bbls	Volume Recovered (bbls) 1s bbls
	Is the concentration of dissolved chloride 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: Tank Overpressure

Spill volume determine by vac truck recovery

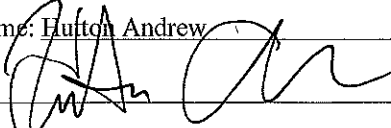
State of New Mexico
Oil Conservation Division

Incident ID	NAPP2329739162
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? ☐ Yes ☒ No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice 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 <u>not</u> 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: <u>Hutton Andrew</u>	Title: <u>EHS Representative</u>
Signature: 	Date: <u>11/03/2023</u>
email: <u>huttona@kfoc.net</u>	Telephone: <u>918-494-0000</u>
<u>OCD Only</u>	
Received by: <u>Shelly Wells</u>	Date: <u>11/3/2023</u>

Incident ID	nAPP2329739162
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

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

What is the shallowest depth to groundwater beneath the area affected by the release?	<u>36</u> (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☒ Yes ☐ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☒ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ☒ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☒ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☒ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☒ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☒ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☒ No
Did the release impact areas not on an exploration, development, production, or storage site?	☐ Yes ☒ No

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

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

- ☒ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☒ Field data
- ☒ Data table of soil contaminant concentration data
- ☒ Depth to water determination
- ☒ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☒ Boring or excavation logs
- ☒ Photographs including date and GIS information
- ☒ Topographic/Aerial maps
- ☒ Laboratory data including chain of custody

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.

State of New Mexico
Oil Conservation Division

Incident ID	nAPP2329739162
District RP	
Facility ID	
Application ID	

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: Hutton Andrew

Title: EHS Supervisor

Signature: _____

Date: 01/19/2024

email: huttona@kfoc.net

Telephone: 918-494-0000

OCD Only

Received by: _____

Date: _____

Incident ID	nAPP2329739162
District RP	
Facility ID	
Application ID	

Remediation Plan

Remediation Plan Checklist: *Each of the following items must be included in the plan.*

- ☐ Detailed description of proposed remediation technique
- ☐ Scaled sitemap with GPS coordinates showing delineation points
- ☐ 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: Hutton AndrewTitle: EHS RepresentativeSignature: _____ Date: 01/19/2024email: huttona@kfoc.net Telephone: 918-494-0000**OCD Only**

Received by: _____ Date: _____

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: _____ Date: _____



APPENDIX B

Referenced Well Records

STATE ENGINEER OFFICE
WELL RECORD

467831

Section 1. GENERAL INFORMATION

(A) Owner of well Draper Brantley Jr. Owner's Well No. _____
 Street or Post Office Address 706 W. Riverside Dr.
 City and State Carlsbad, NM 88220

Well was drilled under Permit No. C-3146 and is located in the:

- a. NW $\frac{1}{4}$ NW $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 24 Township 23S Range 28E N.M.P.M.
 b. Tract No. _____ of Map No. _____ of the _____
 c. Lot No. _____ of Block No. _____ of the _____
 Subdivision, recorded in _____ County.
 d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in
 the _____ Grant.

(B) Drilling Contractor Taylor Water Well Service License No. WD-1348

Address 7317 Etcheverry Rd., Carlsbad, NM 88220

Drilling Began 2/14/05 Completed 2/15/05 Type tools Rotary Size of hole 8 3/4 in.

Elevation of land surface or _____ at well is UK ft. Total depth of well 82 ft.

Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well 36 ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
66	62	16	Conglomerate: yel brn, gry, tn,	More than 100

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
6 5/8	Sch 40	Pvc	+1.5	82	83.5	Cap	62	82

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				

Section 5. PLUGGING RECORD

Plugging Contractor _____
 Address _____
 Plugging Method _____
 Date Well Plugged _____
 Plugging approved by: _____

State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1			
2			
3			
4			

Date Received 3-21-05

FOR USE OF STATE ENGINEER ONLY 32086A

File No. C 3146

Quad

FWL

FSL

Use Dom/STK

Location No. _____

[illegible]

Section 7. REMARKS AND ADDITIONAL INFORMATION

Casing went to 82'. Gravel packed well.

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole.

Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All sections, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 5 need be completed.



APPENDIX C

Photographic Log



Photographic Log

Kaiser Francis Oil Company

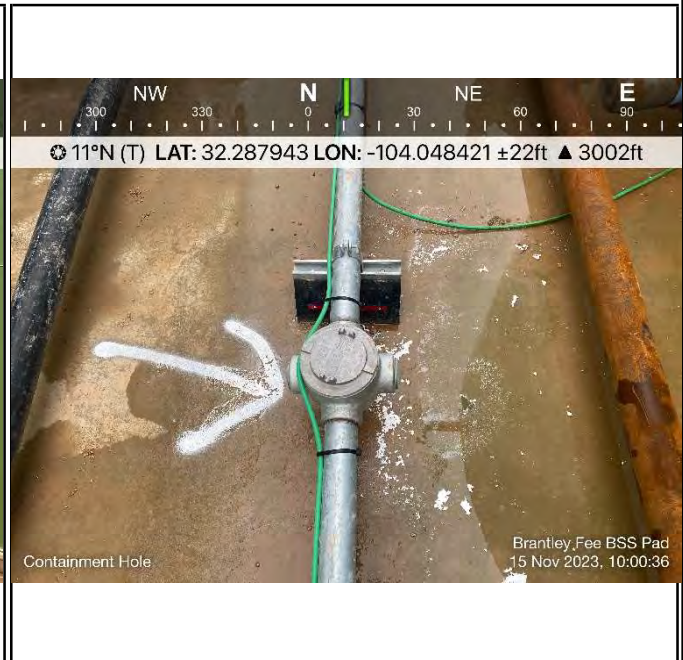
Brantley Fee BS Pad

nAPP2329739162



Photograph 1
Description: Containment
View: South

Date: 11/15/2023



Photograph 2
Description: Hole in Liner
View: North

Date: 11/15/2023



Photograph 3
Description: BH01 and Hand Auger
View: Northeast

Date: 12/19/2023



Photograph 4
Description: Patched Liner
View: North

Date: 12/19/2023



APPENDIX D

Lithologic Soil Sampling Logs

								Sample Name: BH01		Date: 12/19/2023			
								Site Name: Brantley Fee BS Pad					
								Incident Number: nApp2329739162					
								Job Number: 03A2431004					
LITHOLOGIC / SOIL SAMPLING LOG								Logged By: Ethan Haft		Method: Hand Auger			
Coordinates: 32.2879704, -104.0484408								Hole Diameter: 3"		Total Depth: 2ft BGS			
Comments: Field screening conducted with HACH Chloride Test Strips and PetroFLAG for chloride and TPH, respectively. Chloride test performed with 1:4 dilution factor of soil to distilled water. No correction factors included.													
Moisture Content	Chloride (ppm)	TPH (ppm)	Staining	Sample ID	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithologic Descriptions					
Dry	750	NA	N	BH01-0	0	0	SM	Very fine, powdery clay. Buff yellow to tan. Non plastic, well sorted.					
Dry	380	NA	N	BH01-0.5	0.5	0.5	GP-GM	Dark gray silt and limestone gravel. Poorly sorted. Non plastic.					
Dry	ND	41	N	BH01-1	1	1	SW-SM	Dark gray to dark brown silt with limestone gravel. Moderately sorted, non plastic.					
Dry	ND	14	N	BH01-2	2	2	SW-SM	Same as above.					
Total Depth @ 2 ft BGS.													



APPENDIX E

Laboratory Analytical Reports & Chain of Custody Documentation

Report to:
Ashley Giovengo



envirotech

Practical Solutions for a Better Tomorrow

Analytical Report

Kaiser Francis Oil Company

Project Name: Brantley Fee BSS Pad

Work Order: E311156

Job Number: 23078-0001

Received: 11/18/2023

Revision: 1

Report Reviewed By:

Walter Hinchman
Laboratory Director
11/29/23

5796 U.S. Hwy 64
Farmington, NM 87401

Phone: (505) 632-1881
Envirotech-inc.com



Envirotech Inc. certifies the test results meet all requirements of TNI unless noted otherwise.
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Envirotech Inc. holds the Texas TNI certification T104704557 for data reported.

Date Reported: 11/29/23

Ashley Giovengo
1224 Standpipe Rd
Carlsbad, NM 88220



Project Name: Brantley Fee BSS Pad
Workorder: E311156
Date Received: 11/18/2023 7:30:00AM

Ashley Giovengo,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 11/18/2023 7:30:00AM, under the Project Name: Brantley Fee BSS Pad.

The analytical test results summarized in this report with the Project Name: Brantley Fee BSS Pad apply to the individual samples collected, identified and submitted bearing the project name on the enclosed chain-of-custody. Subcontracted sample analyses not conducted by Envirotech, Inc., are attached in full as issued by the subcontract laboratory.

Please review the Chain-of-Custody (COC) and Sample Receipt Checklist (SRC) for any issues regarding sample receipt temperature, containers, preservation etc. To best understand your test results, review the entire report summarizing your sample data and the associated quality control batch data.

All reported data in this analytical report were analyzed according to the referenced method(s) and are in compliance with the latest NELAC/TNI standards, unless otherwise noted. Samples or analytical quality control parameters not meeting specific QC criteria are qualified with a data flag. Data flag definitions are located in the Notes and Definitions section of this analytical report.

If you have any questions concerning this report, please feel free to contact Envirotech, Inc.

Respectfully,

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Sample Summary

Kaiser Francis Oil Company	Project Name:	Brantley Fee BSS Pad	Reported:
1224 Standpipe Rd	Project Number:	23078-0001	
Carlsbad NM, 88220	Project Manager:	Ashley Giovengo	11/29/23 16:01

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
SS01 -0'	E311156-01A	Soil	11/15/23	11/18/23	Glass Jar, 2 oz.
SS02-0'	E311156-02A	Soil	11/15/23	11/18/23	Glass Jar, 2 oz.
SS03-0'	E311156-03A	Soil	11/15/23	11/18/23	Glass Jar, 2 oz.
SS04-0'	E311156-04A	Soil	11/15/23	11/18/23	Glass Jar, 2 oz.



Sample Data

Kaiser Francis Oil Company 1224 Standpipe Rd Carlsbad NM, 88220	Project Name: Brantley Fee BSS Pad Project Number: 23078-0001 Project Manager: Ashley Giovengo	Reported: 11/29/2023 4:01:11PM
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SS01 -0'

E311156-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
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Volatile Organic Compounds by EPA 8260B	mg/kg	mg/kg	Analyst: RAS		Batch: 2347025	
Benzene	ND	0.0250	1	11/20/23	11/27/23	
Ethylbenzene	ND	0.0250	1	11/20/23	11/27/23	
Toluene	ND	0.0250	1	11/20/23	11/27/23	
o-Xylene	ND	0.0250	1	11/20/23	11/27/23	
p,m-Xylene	ND	0.0500	1	11/20/23	11/27/23	
Total Xylenes	ND	0.0250	1	11/20/23	11/27/23	
Surrogate: Bromofluorobenzene	119 %	70-130		11/20/23	11/27/23	
Surrogate: 1,2-Dichloroethane-d4	90.7 %	70-130		11/20/23	11/27/23	
Surrogate: Toluene-d8	109 %	70-130		11/20/23	11/27/23	

Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: RAS		Batch: 2347025	
Gasoline Range Organics (C6-C10)	ND	20.0	1	11/20/23	11/27/23	
Surrogate: Bromofluorobenzene	119 %	70-130		11/20/23	11/27/23	
Surrogate: 1,2-Dichloroethane-d4	90.7 %	70-130		11/20/23	11/27/23	
Surrogate: Toluene-d8	109 %	70-130		11/20/23	11/27/23	

Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: JL		Batch: 2348033	
Diesel Range Organics (C10-C28)	ND	25.0	1	11/28/23	11/29/23	
Oil Range Organics (C28-C36)	ND	50.0	1	11/28/23	11/29/23	
Surrogate: n-Nonane	84.2 %	50-200		11/28/23	11/29/23	

Anions by EPA 300.0/9056A	mg/kg	mg/kg	Analyst: BA		Batch: 2348014	
Chloride	147	20.0	1	11/27/23	11/29/23	



Sample Data

Kaiser Francis Oil Company
1224 Standpipe Rd
Carlsbad NM, 88220

Project Name: Brantley Fee BSS Pad
Project Number: 23078-0001
Project Manager: Ashley Giovengo

Reported:
11/29/2023 4:01:11PM

SS02-0'

E311156-02

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organic Compounds by EPA 8260B						
	mg/kg	mg/kg		Analyst: RAS		Batch: 2347025
Benzene	ND	0.0250	1	11/20/23	11/27/23	
Ethylbenzene	ND	0.0250	1	11/20/23	11/27/23	
Toluene	ND	0.0250	1	11/20/23	11/27/23	
o-Xylene	ND	0.0250	1	11/20/23	11/27/23	
p,m-Xylene	ND	0.0500	1	11/20/23	11/27/23	
Total Xylenes	ND	0.0250	1	11/20/23	11/27/23	
Surrogate: Bromofluorobenzene		117 %	70-130	11/20/23	11/27/23	
Surrogate: 1,2-Dichloroethane-d4		93.3 %	70-130	11/20/23	11/27/23	
Surrogate: Toluene-d8		111 %	70-130	11/20/23	11/27/23	
Nonhalogenated Organics by EPA 8015D - GRO						
	mg/kg	mg/kg		Analyst: RAS		Batch: 2347025
Gasoline Range Organics (C6-C10)	ND	20.0	1	11/20/23	11/27/23	
Surrogate: Bromofluorobenzene		117 %	70-130	11/20/23	11/27/23	
Surrogate: 1,2-Dichloroethane-d4		93.3 %	70-130	11/20/23	11/27/23	
Surrogate: Toluene-d8		111 %	70-130	11/20/23	11/27/23	
Nonhalogenated Organics by EPA 8015D - DRO/ORO						
	mg/kg	mg/kg		Analyst: JL		Batch: 2348033
Diesel Range Organics (C10-C28)	ND	25.0	1	11/28/23	11/29/23	
Oil Range Organics (C28-C36)	ND	50.0	1	11/28/23	11/29/23	
Surrogate: n-Nonane		89.3 %	50-200	11/28/23	11/29/23	
Anions by EPA 300.0/9056A						
	mg/kg	mg/kg		Analyst: BA		Batch: 2348014
Chloride	565	20.0	1	11/27/23	11/29/23	



Sample Data

Kaiser Francis Oil Company 1224 Standpipe Rd Carlsbad NM, 88220	Project Name: Brantley Fee BSS Pad Project Number: 23078-0001 Project Manager: Ashley Giovengo	Reported: 11/29/2023 4:01:11PM
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SS03-0'

E311156-03

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organic Compounds by EPA 8260B						
	mg/kg	mg/kg		Analyst: RAS		Batch: 2347025
Benzene	ND	0.0250	1	11/20/23	11/27/23	
Ethylbenzene	ND	0.0250	1	11/20/23	11/27/23	
Toluene	ND	0.0250	1	11/20/23	11/27/23	
o-Xylene	ND	0.0250	1	11/20/23	11/27/23	
p,m-Xylene	ND	0.0500	1	11/20/23	11/27/23	
Total Xylenes	ND	0.0250	1	11/20/23	11/27/23	
Surrogate: Bromofluorobenzene		119 %	70-130	11/20/23	11/27/23	
Surrogate: 1,2-Dichloroethane-d4		89.5 %	70-130	11/20/23	11/27/23	
Surrogate: Toluene-d8		110 %	70-130	11/20/23	11/27/23	
Nonhalogenated Organics by EPA 8015D - GRO						
	mg/kg	mg/kg		Analyst: RAS		Batch: 2347025
Gasoline Range Organics (C6-C10)	ND	20.0	1	11/20/23	11/27/23	
Surrogate: Bromofluorobenzene		119 %	70-130	11/20/23	11/27/23	
Surrogate: 1,2-Dichloroethane-d4		89.5 %	70-130	11/20/23	11/27/23	
Surrogate: Toluene-d8		110 %	70-130	11/20/23	11/27/23	
Nonhalogenated Organics by EPA 8015D - DRO/ORO						
	mg/kg	mg/kg		Analyst: JL		Batch: 2348033
Diesel Range Organics (C10-C28)	ND	25.0	1	11/28/23	11/29/23	
Oil Range Organics (C28-C36)	ND	50.0	1	11/28/23	11/29/23	
Surrogate: n-Nonane		89.9 %	50-200	11/28/23	11/29/23	
Anions by EPA 300.0/9056A						
	mg/kg	mg/kg		Analyst: BA		Batch: 2348014
Chloride	ND	200	10	11/27/23	11/29/23	



Sample Data

Kaiser Francis Oil Company
1224 Standpipe Rd
Carlsbad NM, 88220

Project Name: Brantley Fee BSS Pad
Project Number: 23078-0001
Project Manager: Ashley Giovengo

Reported:
11/29/2023 4:01:11PM

SS04-0'

E311156-04

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organic Compounds by EPA 8260B						
	mg/kg	mg/kg		Analyst: RAS		Batch: 2347025
Benzene	ND	0.0250	1	11/20/23	11/27/23	
Ethylbenzene	ND	0.0250	1	11/20/23	11/27/23	
Toluene	ND	0.0250	1	11/20/23	11/27/23	
o-Xylene	ND	0.0250	1	11/20/23	11/27/23	
p,m-Xylene	ND	0.0500	1	11/20/23	11/27/23	
Total Xylenes	ND	0.0250	1	11/20/23	11/27/23	
Surrogate: Bromofluorobenzene		117 %	70-130	11/20/23	11/27/23	
Surrogate: 1,2-Dichloroethane-d4		91.9 %	70-130	11/20/23	11/27/23	
Surrogate: Toluene-d8		109 %	70-130	11/20/23	11/27/23	
Nonhalogenated Organics by EPA 8015D - GRO						
	mg/kg	mg/kg		Analyst: RAS		Batch: 2347025
Gasoline Range Organics (C6-C10)	ND	20.0	1	11/20/23	11/27/23	
Surrogate: Bromofluorobenzene		117 %	70-130	11/20/23	11/27/23	
Surrogate: 1,2-Dichloroethane-d4		91.9 %	70-130	11/20/23	11/27/23	
Surrogate: Toluene-d8		109 %	70-130	11/20/23	11/27/23	
Nonhalogenated Organics by EPA 8015D - DRO/ORO						
	mg/kg	mg/kg		Analyst: JL		Batch: 2348033
Diesel Range Organics (C10-C28)	ND	25.0	1	11/28/23	11/29/23	
Oil Range Organics (C28-C36)	ND	50.0	1	11/28/23	11/29/23	
Surrogate: n-Nonane		95.2 %	50-200	11/28/23	11/29/23	
Anions by EPA 300.0/9056A						
	mg/kg	mg/kg		Analyst: BA		Batch: 2348014
Chloride	317	200	10	11/27/23	11/29/23	



QC Summary Data

Kaiser Francis Oil Company	Project Name:	Brantley Fee BSS Pad	Reported: 11/29/2023 4:01:11PM
1224 Standpipe Rd	Project Number:	23078-0001	
Carlsbad NM, 88220	Project Manager:	Ashley Giovengo	

Volatile Organic Compounds by EPA 8260B

Analyst: RAS

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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Blank (2347025-BLK1) Prepared: 11/20/23 Analyzed: 11/27/23

Benzene	ND	0.0250							
Ethylbenzene	ND	0.0250							
Toluene	ND	0.0250							
o-Xylene	ND	0.0250							
p,m-Xylene	ND	0.0500							
Total Xylenes	ND	0.0250							
Surrogate: Bromofluorobenzene	0.591		0.500		118	70-130			
Surrogate: 1,2-Dichloroethane-d4	0.445		0.500		88.9	70-130			
Surrogate: Toluene-d8	0.538		0.500		108	70-130			

LCS (2347025-BS1) Prepared: 11/20/23 Analyzed: 11/27/23

Benzene	2.85	0.0250	2.50		114	70-130			
Ethylbenzene	2.80	0.0250	2.50		112	70-130			
Toluene	2.76	0.0250	2.50		110	70-130			
o-Xylene	2.69	0.0250	2.50		108	70-130			
p,m-Xylene	5.41	0.0500	5.00		108	70-130			
Total Xylenes	8.10	0.0250	7.50		108	70-130			
Surrogate: Bromofluorobenzene	0.597		0.500		119	70-130			
Surrogate: 1,2-Dichloroethane-d4	0.494		0.500		98.7	70-130			
Surrogate: Toluene-d8	0.557		0.500		111	70-130			

Matrix Spike (2347025-MS1) Source: E311158-16 Prepared: 11/20/23 Analyzed: 11/27/23

Benzene	2.85	0.0250	2.50	ND	114	48-131			
Ethylbenzene	2.78	0.0250	2.50	ND	111	45-135			
Toluene	2.74	0.0250	2.50	ND	110	48-130			
o-Xylene	2.68	0.0250	2.50	ND	107	43-135			
p,m-Xylene	5.41	0.0500	5.00	ND	108	43-135			
Total Xylenes	8.10	0.0250	7.50	ND	108	43-135			
Surrogate: Bromofluorobenzene	0.589		0.500		118	70-130			
Surrogate: 1,2-Dichloroethane-d4	0.474		0.500		94.8	70-130			
Surrogate: Toluene-d8	0.547		0.500		109	70-130			

Matrix Spike Dup (2347025-MSD1) Source: E311158-16 Prepared: 11/20/23 Analyzed: 11/27/23

Benzene	2.82	0.0250	2.50	ND	113	48-131	0.987	23	
Ethylbenzene	2.74	0.0250	2.50	ND	110	45-135	1.61	27	
Toluene	2.71	0.0250	2.50	ND	108	48-130	1.34	24	
o-Xylene	2.70	0.0250	2.50	ND	108	43-135	0.669	27	
p,m-Xylene	5.41	0.0500	5.00	ND	108	43-135	0.120	27	
Total Xylenes	8.11	0.0250	7.50	ND	108	43-135	0.142	27	
Surrogate: Bromofluorobenzene	0.609		0.500		122	70-130			
Surrogate: 1,2-Dichloroethane-d4	0.474		0.500		94.7	70-130			
Surrogate: Toluene-d8	0.540		0.500		108	70-130			



QC Summary Data

Kaiser Francis Oil Company	Project Name:	Brantley Fee BSS Pad	Reported: 11/29/2023 4:01:11PM
1224 Standpipe Rd	Project Number:	23078-0001	
Carlsbad NM, 88220	Project Manager:	Ashley Giovengo	

Nonhalogenated Organics by EPA 8015D - GRO

Analyst: RAS

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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Blank (2347025-BLK1) Prepared: 11/20/23 Analyzed: 11/27/23

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: Bromofluorobenzene	0.591		0.500		118	70-130			
Surrogate: 1,2-Dichloroethane-d4	0.445		0.500		88.9	70-130			
Surrogate: Toluene-d8	0.538		0.500		108	70-130			

LCS (2347025-BS2) Prepared: 11/20/23 Analyzed: 11/27/23

Gasoline Range Organics (C6-C10)	54.9	20.0	50.0		110	70-130			
Surrogate: Bromofluorobenzene	0.602		0.500		120	70-130			
Surrogate: 1,2-Dichloroethane-d4	0.484		0.500		96.7	70-130			
Surrogate: Toluene-d8	0.563		0.500		113	70-130			

Matrix Spike (2347025-MS2) Source: E311158-16 Prepared: 11/20/23 Analyzed: 11/27/23

Gasoline Range Organics (C6-C10)	54.0	20.0	50.0	ND	108	70-130			
Surrogate: Bromofluorobenzene	0.589		0.500		118	70-130			
Surrogate: 1,2-Dichloroethane-d4	0.461		0.500		92.1	70-130			
Surrogate: Toluene-d8	0.553		0.500		111	70-130			

Matrix Spike Dup (2347025-MSD2) Source: E311158-16 Prepared: 11/20/23 Analyzed: 11/27/23

Gasoline Range Organics (C6-C10)	55.8	20.0	50.0	ND	112	70-130	3.24	20	
Surrogate: Bromofluorobenzene	0.611		0.500		122	70-130			
Surrogate: 1,2-Dichloroethane-d4	0.466		0.500		93.1	70-130			
Surrogate: Toluene-d8	0.557		0.500		111	70-130			



QC Summary Data

Kaiser Francis Oil Company	Project Name:	Brantley Fee BSS Pad	Reported:
1224 Standpipe Rd	Project Number:	23078-0001	
Carlsbad NM, 88220	Project Manager:	Ashley Giovengo	11/29/2023 4:01:11PM

Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: JL

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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Blank (2348033-BLK1) Prepared: 11/28/23 Analyzed: 11/29/23

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: n-Nonane	41.3		50.0		82.5	50-200			

LCS (2348033-BS1) Prepared: 11/28/23 Analyzed: 11/29/23

Diesel Range Organics (C10-C28)	188	25.0	250		75.1	38-132			
Surrogate: n-Nonane	34.2		50.0		68.4	50-200			

Matrix Spike (2348033-MS1) Source: E311145-04 Prepared: 11/28/23 Analyzed: 11/29/23

Diesel Range Organics (C10-C28)	197	25.0	250	ND	78.7	38-132			
Surrogate: n-Nonane	33.2		50.0		66.3	50-200			

Matrix Spike Dup (2348033-MSD1) Source: E311145-04 Prepared: 11/28/23 Analyzed: 11/29/23

Diesel Range Organics (C10-C28)	191	25.0	250	ND	76.5	38-132	2.75	20	
Surrogate: n-Nonane	32.7		50.0		65.5	50-200			



QC Summary Data

Kaiser Francis Oil Company	Project Name:	Brantley Fee BSS Pad	Reported:
1224 Standpipe Rd	Project Number:	23078-0001	
Carlsbad NM, 88220	Project Manager:	Ashley Giovengo	11/29/2023 4:01:11PM

Anions by EPA 300.0/9056A

Analyst: BA

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

Blank (2348014-BLK1)					Prepared: 11/27/23 Analyzed: 11/29/23				
Chloride	ND	20.0							
LCS (2348014-BS1)					Prepared: 11/27/23 Analyzed: 11/29/23				
Chloride	249	20.0	250		99.7	90-110			
Matrix Spike (2348014-MS1)					Source: E311145-02		Prepared: 11/27/23 Analyzed: 11/29/23		
Chloride	264	20.0	250	ND	105	80-120			
Matrix Spike Dup (2348014-MSD1)					Source: E311145-02		Prepared: 11/27/23 Analyzed: 11/29/23		
Chloride	266	20.0	250	ND	106	80-120	0.895	20	

QC Summary Report Comment:
Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures.
Therefore, hand calculated values may differ slightly.



Definitions and Notes

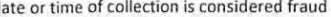
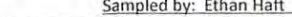
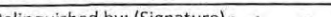
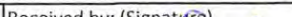
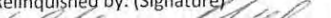
Kaiser Francis Oil Company	Project Name:	Brantley Fee BSS Pad	
1224 Standpipe Rd	Project Number:	23078-0001	Reported:
Carlsbad NM, 88220	Project Manager:	Ashley Giovengo	11/29/23 16:01

- ND Analyte NOT DETECTED at or above the reporting limit
 - NR Not Reported
 - RPD Relative Percent Difference
 - DNI Did Not Ignite
 - DNR Did not react with the addition of acid or base.
- Note (1): Methods marked with ** are non-accredited methods.
- Note (2): Soil data is reported on an "as received" weight basis, unless reported otherwise.

Client: Kaiser-Francis Oil Company	Bill To	Lab Use Only				TAT				EPA Program					
Project: Brantley Fee BSS Pad	Attention: Hutton Andrew	Lab WO#		Job Number		1D	2D	3D	Standard		CWA	SDWA			
Project Manager: Ashley Giovengo	Address: 6733 Tale Ave	E311560		23078-0001					X						
Address: 3122 National Parks Hwy	City, State, Zip: Tulsa OK, 74136	Analysis and Method										RCRA			
City, State, Zip: Carlsbad NM, 88220	Phone: 580-307-7363	O/DRO/ORO by	8021	8260	6010	± 300.0			NM	TX	State				
Phone: 575-988-0055	NM										CO	UT	AZ	TX	
Email: agiovengo@ensolum.com	x														
Report due by:	Email: huttona@kfoc.net														

[illegible]

Additional Instructions: Please CC: cburton@ensolum.com, agiovento@ensolum.com, chamilton@ensolum.com, ehaft@ensolum.com - Samples kept on ice

I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabelling the sample location, date or time of collection is considered fraud and may be grounds for legal action.						Samples requiring thermal preservation must be received on ice the day they are sampled or received packed in ice at an avg temp above 0 but less than 5°C on subsequent days.															
Relinquished by: (Signature) 						Date 11/17/23		Time 0700		Received by: (Signature) 		Date 11-17-23		Time 1015		Lab Use Only Received on ice: ☒ Y ☐ N					
Relinquished by: (Signature) 						Date 11-17-23		Time 1700		Received by: (Signature) 		Date 11-17-23		Time 1800		T1 _____ T2 _____ T3 _____					
Relinquished by: (Signature) 						Date 11-17-23		Time 2400		Received by: (Signature) 		Date 11-18-23		Time 730		AVG Temp °C <u>4</u>					

Sample Matrix: S - Soil, Sd - Solid, Sg - Sludge, A - Aqueous, O - Other

Container Type: g - glass, p - poly/plastic, ag - amber glass, v - VOA

Note: Samples are discarded 30 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.

Envirotech Analytical Laboratory

Printed: 11/20/2023 10:38:08AM

Sample Receipt Checklist (SRC)

Instructions: Please take note of any NO checkmarks.

If we receive no response concerning these items within 24 hours of the date of this notice, all the samples will be analyzed as requested.

Client:	Kaiser Francis Oil Company	Date Received:	11/18/23 07:30	Work Order ID:	E311156
Phone:	(505) 382-1211	Date Logged In:	11/17/23 15:17	Logged In By:	Jordan Montano
Email:	agiovento@ensolum.com	Due Date:	11/29/23 17:00 (5 day TAT)		

Chain of Custody (COC)

1. Does the sample ID match the COC? Yes
2. Does the number of samples per sampling site location match the COC? Yes
3. Were samples dropped off by client or carrier? Yes
4. Was the COC complete, i.e., signatures, dates/times, requested analyses? Yes
5. Were all samples received within holding time? Yes

Note: Analysis, such as pH which should be conducted in the field, i.e., 15 minute hold time, are not included in this discussion.

Carrier: CourierComments/ResolutionSample Turn Around Time (TAT)

6. Did the COC indicate standard TAT, or Expedited TAT? Yes

Sample Cooler

7. Was a sample cooler received? Yes
8. If yes, was cooler received in good condition? Yes
9. Was the sample(s) received intact, i.e., not broken? Yes
10. Were custody/security seals present? No
11. If yes, were custody/security seals intact? NA
12. Was the sample received on ice? If yes, the recorded temp is 4°C, i.e., 6°±2°C Yes

Note: Thermal preservation is not required, if samples are received w/i 15 minutes of sampling

13. If no visible ice, record the temperature. Actual sample temperature: 4°C

Sample Container

14. Are aqueous VOC samples present? No
15. Are VOC samples collected in VOA Vials? NA
16. Is the head space less than 6-8 mm (pea sized or less)? NA
17. Was a trip blank (TB) included for VOC analyses? NA
18. Are non-VOC samples collected in the correct containers? Yes
19. Is the appropriate volume/weight or number of sample containers collected? Yes

Field Label

20. Were field sample labels filled out with the minimum information:
 - Sample ID? Yes
 - Date/Time Collected? Yes
 - Collectors name? Yes

Sample Preservation

21. Does the COC or field labels indicate the samples were preserved? No
22. Are sample(s) correctly preserved? NA
24. Is lab filtration required and/or requested for dissolved metals? No

Multiphase Sample Matrix

26. Does the sample have more than one phase, i.e., multiphase? No
27. If yes, does the COC specify which phase(s) is to be analyzed? NA

Subcontract Laboratory

28. Are samples required to get sent to a subcontract laboratory? No
29. Was a subcontract laboratory specified by the client and if so who? NA Subcontract Lab: NA

Client Instruction

Signature of client authorizing changes to the COC or sample disposition.

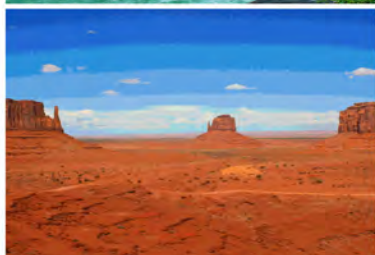
Date



envirotech Inc.

Report to:

Ashley Giovengo



envirotech

Practical Solutions for a Better Tomorrow

Analytical Report

Kaiser Francis Oil Company

Project Name: Brantley Fee BSS Pad

Work Order: E312153

Job Number: 23078-0001

Received: 12/21/2023

Revision: 1

Report Reviewed By:

Walter Hinchman
Laboratory Director
1/2/24

5796 U.S. Hwy 64
Farmington, NM 87401

Phone: (505) 632-1881
Envirotech-inc.com



Envirotech Inc. certifies the test results meet all requirements of TNI unless noted otherwise.
Statement of Data Authenticity: Envirotech Inc. attests the data reported has not been altered in any way.
Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech Inc.
Envirotech Inc. holds the Utah TNI certification NM00979 for data reported.
Envirotech Inc. holds the Texas TNI certification T104704557 for data reported.

Date Reported: 1/2/24

Ashley Giovengo
6733 South Yale Ave
Tulsa, OK 74136



Project Name: Brantley Fee BSS Pad
Workorder: E312153
Date Received: 12/21/2023 8:45:00AM

Ashley Giovengo,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 12/21/2023 8:45:00AM, under the Project Name: Brantley Fee BSS Pad.

The analytical test results summarized in this report with the Project Name: Brantley Fee BSS Pad apply to the individual samples collected, identified and submitted bearing the project name on the enclosed chain-of-custody. Subcontracted sample analyses not conducted by Envirotech, Inc., are attached in full as issued by the subcontract laboratory.

Please review the Chain-of-Custody (COC) and Sample Receipt Checklist (SRC) for any issues regarding sample receipt temperature, containers, preservation etc. To best understand your test results, review the entire report summarizing your sample data and the associated quality control batch data.

All reported data in this analytical report were analyzed according to the referenced method(s) and are in compliance with the latest NELAC/TNI standards, unless otherwise noted. Samples or analytical quality control parameters not meeting specific QC criteria are qualified with a data flag. Data flag definitions are located in the Notes and Definitions section of this analytical report.

If you have any questions concerning this report, please feel free to contact Envirotech, Inc.

Respectfully,

Walter Hinchman
Laboratory Director
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Cell: 775-287-1762
whinchman@envirotech-inc.com

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Laboratory Administrator
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Sample Summary

Kaiser Francis Oil Company	Project Name:	Brantley Fee BSS Pad	Reported:
6733 South Yale Ave	Project Number:	23078-0001	
Tulsa OK, 74136	Project Manager:	Ashley Giovengo	01/02/24 08:49

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
BH01-0'	E312153-01A	Soil	12/19/23	12/21/23	Glass Jar, 2 oz.
BH01-0.5'	E312153-02A	Soil	12/19/23	12/21/23	Glass Jar, 2 oz.
BH01-1'	E312153-03A	Soil	12/19/23	12/21/23	Glass Jar, 2 oz.
BH01-2'	E312153-04A	Soil	12/19/23	12/21/23	Glass Jar, 2 oz.



Sample Data

Kaiser Francis Oil Company 6733 South Yale Ave Tulsa OK, 74136	Project Name: Brantley Fee BSS Pad Project Number: 23078-0001 Project Manager: Ashley Giovengo	Reported: 1/2/2024 8:49:12AM
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BH01-0'

E312153-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analyst: RKS		Batch: 2351083	
Benzene	ND	0.0250	1	12/21/23	12/22/23	
Ethylbenzene	ND	0.0250	1	12/21/23	12/22/23	
Toluene	ND	0.0250	1	12/21/23	12/22/23	
o-Xylene	ND	0.0250	1	12/21/23	12/22/23	
p,m-Xylene	ND	0.0500	1	12/21/23	12/22/23	
Total Xylenes	ND	0.0250	1	12/21/23	12/22/23	
Surrogate: 4-Bromochlorobenzene-PID	96.0 %	70-130		12/21/23	12/22/23	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: RKS		Batch: 2351083	
Gasoline Range Organics (C6-C10)	ND	20.0	1	12/21/23	12/22/23	
Surrogate: 1-Chloro-4-fluorobenzene-FID	89.0 %	70-130		12/21/23	12/22/23	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: KM		Batch: 2351091	
Diesel Range Organics (C10-C28)	ND	25.0	1	12/22/23	12/22/23	
Oil Range Organics (C28-C36)	ND	50.0	1	12/22/23	12/22/23	
Surrogate: n-Nonane	91.1 %	50-200		12/22/23	12/22/23	
Anions by EPA 300.0/9056A	mg/kg	mg/kg	Analyst: IY		Batch: 2351107	
Chloride	922	20.0	1	12/22/23	12/28/23	



Sample Data

Kaiser Francis Oil Company
6733 South Yale Ave
Tulsa OK, 74136

Project Name: Brantley Fee BSS Pad
Project Number: 23078-0001
Project Manager: Ashley Giovengo

Reported:
1/2/2024 8:49:12AM

BH01-0.5'**E312153-02**

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B						
	mg/kg	mg/kg		Analyst: RKS		Batch: 2351083
Benzene	ND	0.0250	1	12/21/23	12/22/23	
Ethylbenzene	ND	0.0250	1	12/21/23	12/22/23	
Toluene	ND	0.0250	1	12/21/23	12/22/23	
o-Xylene	ND	0.0250	1	12/21/23	12/22/23	
p,m-Xylene	ND	0.0500	1	12/21/23	12/22/23	
Total Xylenes	ND	0.0250	1	12/21/23	12/22/23	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>						
	96.6 %	70-130		12/21/23	12/22/23	
Nonhalogenated Organics by EPA 8015D - GRO						
	mg/kg	mg/kg		Analyst: RKS		Batch: 2351083
Gasoline Range Organics (C6-C10)	ND	20.0	1	12/21/23	12/22/23	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>						
	89.0 %	70-130		12/21/23	12/22/23	
Nonhalogenated Organics by EPA 8015D - DRO/ORO						
	mg/kg	mg/kg		Analyst: KM		Batch: 2351091
Diesel Range Organics (C10-C28)	ND	25.0	1	12/22/23	12/22/23	
Oil Range Organics (C28-C36)	ND	50.0	1	12/22/23	12/22/23	
<i>Surrogate: n-Nonane</i>						
	99.3 %	50-200		12/22/23	12/22/23	
Anions by EPA 300.0/9056A						
	mg/kg	mg/kg		Analyst: IY		Batch: 2351107
Chloride	438	20.0	1	12/22/23	12/28/23	



Sample Data

Kaiser Francis Oil Company	Project Name:	Brantley Fee BSS Pad	Reported: 1/2/2024 8:49:12AM
6733 South Yale Ave	Project Number:	23078-0001	
Tulsa OK, 74136	Project Manager:	Ashley Giovengo	

BH01-1'

E312153-03

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analyst: RKS		Batch: 2351083	
Benzene	ND	0.0250	1	12/21/23	12/22/23	
Ethylbenzene	ND	0.0250	1	12/21/23	12/22/23	
Toluene	ND	0.0250	1	12/21/23	12/22/23	
o-Xylene	ND	0.0250	1	12/21/23	12/22/23	
p,m-Xylene	ND	0.0500	1	12/21/23	12/22/23	
Total Xylenes	ND	0.0250	1	12/21/23	12/22/23	
Surrogate: 4-Bromochlorobenzene-PID	87.7 %	70-130		12/21/23	12/22/23	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: RKS		Batch: 2351083	
Gasoline Range Organics (C6-C10)	ND	20.0	1	12/21/23	12/22/23	
Surrogate: 1-Chloro-4-fluorobenzene-FID	91.6 %	70-130		12/21/23	12/22/23	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: KM		Batch: 2351091	
Diesel Range Organics (C10-C28)	ND	25.0	1	12/22/23	12/22/23	
Oil Range Organics (C28-C36)	ND	50.0	1	12/22/23	12/22/23	
Surrogate: n-Nonane	103 %	50-200		12/22/23	12/22/23	
Anions by EPA 300.0/9056A	mg/kg	mg/kg	Analyst: IY		Batch: 2351107	
Chloride	46.4	20.0	1	12/22/23	12/28/23	



Sample Data

Kaiser Francis Oil Company	Project Name:	Brantley Fee BSS Pad	Reported: 1/2/2024 8:49:12AM
6733 South Yale Ave	Project Number:	23078-0001	
Tulsa OK, 74136	Project Manager:	Ashley Giovengo	

BH01-2'

E312153-04

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analyst: RKS		Batch: 2351083	
Benzene	ND	0.0250	1	12/21/23	12/22/23	
Ethylbenzene	ND	0.0250	1	12/21/23	12/22/23	
Toluene	ND	0.0250	1	12/21/23	12/22/23	
o-Xylene	ND	0.0250	1	12/21/23	12/22/23	
p,m-Xylene	ND	0.0500	1	12/21/23	12/22/23	
Total Xylenes	ND	0.0250	1	12/21/23	12/22/23	
Surrogate: 4-Bromochlorobenzene-PID	96.7 %	70-130		12/21/23	12/22/23	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: RKS		Batch: 2351083	
Gasoline Range Organics (C6-C10)	ND	20.0	1	12/21/23	12/22/23	
Surrogate: 1-Chloro-4-fluorobenzene-FID	87.6 %	70-130		12/21/23	12/22/23	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: KM		Batch: 2351091	
Diesel Range Organics (C10-C28)	ND	25.0	1	12/22/23	12/22/23	
Oil Range Organics (C28-C36)	ND	50.0	1	12/22/23	12/22/23	
Surrogate: n-Nonane	98.7 %	50-200		12/22/23	12/22/23	
Anions by EPA 300.0/9056A	mg/kg	mg/kg	Analyst: IY		Batch: 2351107	
Chloride	73.7	20.0	1	12/22/23	12/28/23	



QC Summary Data

Kaiser Francis Oil Company	Project Name:	Brantley Fee BSS Pad	Reported:
6733 South Yale Ave	Project Number:	23078-0001	
Tulsa OK, 74136	Project Manager:	Ashley Giovengo	1/2/2024 8:49:12AM

Volatile Organics by EPA 8021B

Analyst: RKS

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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Blank (2351083-BLK1) Prepared: 12/21/23 Analyzed: 12/22/23

Benzene	ND	0.0250							
Ethylbenzene	ND	0.0250							
Toluene	ND	0.0250							
o-Xylene	ND	0.0250							
p,m-Xylene	ND	0.0500							
Total Xylenes	ND	0.0250							
Surrogate: 4-Bromochlorobenzene-PID	6.81		8.00		85.1	70-130			

LCS (2351083-BS1) Prepared: 12/21/23 Analyzed: 12/22/23

Benzene	4.86	0.0250	5.00		97.1	70-130			
Ethylbenzene	4.74	0.0250	5.00		94.7	70-130			
Toluene	4.91	0.0250	5.00		98.1	70-130			
o-Xylene	4.84	0.0250	5.00		96.9	70-130			
p,m-Xylene	9.78	0.0500	10.0		97.8	70-130			
Total Xylenes	14.6	0.0250	15.0		97.5	70-130			
Surrogate: 4-Bromochlorobenzene-PID	7.01		8.00		87.7	70-130			

Matrix Spike (2351083-MS1) Source: E312153-03 Prepared: 12/21/23 Analyzed: 12/22/23

Benzene	4.77	0.0250	5.00	ND	95.3	54-133			
Ethylbenzene	4.67	0.0250	5.00	ND	93.4	61-133			
Toluene	4.83	0.0250	5.00	ND	96.6	61-130			
o-Xylene	4.77	0.0250	5.00	ND	95.5	63-131			
p,m-Xylene	9.65	0.0500	10.0	ND	96.5	63-131			
Total Xylenes	14.4	0.0250	15.0	ND	96.2	63-131			
Surrogate: 4-Bromochlorobenzene-PID	7.08		8.00		88.5	70-130			

Matrix Spike Dup (2351083-MSD1) Source: E312153-03 Prepared: 12/21/23 Analyzed: 12/22/23

Benzene	4.80	0.0250	5.00	ND	96.0	54-133	0.716	20	
Ethylbenzene	4.71	0.0250	5.00	ND	94.3	61-133	0.919	20	
Toluene	4.87	0.0250	5.00	ND	97.3	61-130	0.744	20	
o-Xylene	4.82	0.0250	5.00	ND	96.4	63-131	1.02	20	
p,m-Xylene	9.73	0.0500	10.0	ND	97.3	63-131	0.790	20	
Total Xylenes	14.5	0.0250	15.0	ND	97.0	63-131	0.866	20	
Surrogate: 4-Bromochlorobenzene-PID	7.20		8.00		90.0	70-130			



QC Summary Data

Kaiser Francis Oil Company	Project Name:	Brantley Fee BSS Pad	Reported:
6733 South Yale Ave	Project Number:	23078-0001	
Tulsa OK, 74136	Project Manager:	Ashley Giovengo	1/2/2024 8:49:12AM

Nonhalogenated Organics by EPA 8015D - GRO

Analyst: RKS

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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Blank (2351083-BLK1)

Prepared: 12/21/23 Analyzed: 12/22/23

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.23		8.00		90.4	70-130			

LCS (2351083-BS2)

Prepared: 12/21/23 Analyzed: 12/22/23

Gasoline Range Organics (C6-C10)	45.1	20.0	50.0		90.1	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.36		8.00		92.0	70-130			

Matrix Spike (2351083-MS2)

Source: E312153-03 Prepared: 12/21/23 Analyzed: 12/22/23

Gasoline Range Organics (C6-C10)	44.1	20.0	50.0	ND	88.2	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.21		8.00		90.1	70-130			

Matrix Spike Dup (2351083-MSD2)

Source: E312153-03 Prepared: 12/21/23 Analyzed: 12/22/23

Gasoline Range Organics (C6-C10)	44.8	20.0	50.0	ND	89.6	70-130	1.58	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.20		8.00		90.0	70-130			



QC Summary Data

Kaiser Francis Oil Company	Project Name:	Brantley Fee BSS Pad	Reported:
6733 South Yale Ave	Project Number:	23078-0001	
Tulsa OK, 74136	Project Manager:	Ashley Giovengo	1/2/2024 8:49:12AM

Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: KM

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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Blank (2351091-BLK1)	Prepared: 12/22/23 Analyzed: 12/22/23								
Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: n-Nonane	49.9		50.0		99.7	50-200			

LCS (2351091-BS1)	Prepared: 12/22/23 Analyzed: 12/22/23								
Diesel Range Organics (C10-C28)	248	25.0	250		99.3	38-132			
Surrogate: n-Nonane	50.2		50.0		100	50-200			

Matrix Spike (2351091-MS1)				Source: E312149-03	Prepared: 12/22/23 Analyzed: 12/22/23				
Diesel Range Organics (C10-C28)	8960	500	250	8160	318	38-132			M4
Surrogate: n-Nonane	49.0		50.0		97.9	50-200			

Matrix Spike Dup (2351091-MSD1)				Source: E312149-03	Prepared: 12/22/23 Analyzed: 12/22/23				
Diesel Range Organics (C10-C28)	8260	500	250	8160	40.6	38-132	8.05	20	
Surrogate: n-Nonane	50.0		50.0		100	50-200			



QC Summary Data

Kaiser Francis Oil Company	Project Name:	Brantley Fee BSS Pad	Reported:
6733 South Yale Ave	Project Number:	23078-0001	
Tulsa OK, 74136	Project Manager:	Ashley Giovengo	1/2/2024 8:49:12AM

Anions by EPA 300.0/9056A

Analyst: IY

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

Blank (2351107-BLK1)					Prepared: 12/22/23 Analyzed: 12/27/23				
Chloride	ND	20.0							
LCS (2351107-BS1)					Prepared: 12/22/23 Analyzed: 12/28/23				
Chloride	256	20.0	250		102	90-110			
Matrix Spike (2351107-MS1)					Source: E312153-02		Prepared: 12/22/23 Analyzed: 12/28/23		
Chloride	707	20.0	250	438	108	80-120			
Matrix Spike Dup (2351107-MSD1)					Source: E312153-02		Prepared: 12/22/23 Analyzed: 12/28/23		
Chloride	707	20.0	250	438	108	80-120	0.0243	20	

QC Summary Report Comment:
Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures.
Therefore, hand calculated values may differ slightly.



Definitions and Notes

Kaiser Francis Oil Company	Project Name:	Brantley Fee BSS Pad	
6733 South Yale Ave	Project Number:	23078-0001	Reported:
Tulsa OK, 74136	Project Manager:	Ashley Giovengo	01/02/24 08:49

- M4 Matrix spike recovery value is suspect since the analyte concentration in the sample is disproportionate to the spike level. The associated LCS spike recovery was acceptable.
- ND Analyte NOT DETECTED at or above the reporting limit
- NR Not Reported
- RPD Relative Percent Difference
- DNI Did Not Ignite
- DNR Did not react with the addition of acid or base.

Note (1): Methods marked with ** are non-accredited methods.

Note (2): Soil data is reported on an "as received" weight basis, unless reported otherwise.



Client: Kaiser-Francis Oil Company					Bill To					Lab Use Only					TAT				EPA Program			
Project: Brantley Fee BSS Pad					Attention: Hutton Andrew					Lab WO#					1D 2D 3D				Standard			
Project Manager: Ashley Giovengo					Address: 6733 Tale Ave					Job Number					X				CWA			
Address: 3122 National Parks Hwy					City, State, Zip: Tulsa OK, 74136					Analysis and Method									RCRA			
City, State, Zip Carlsbad NM, 88220					Phone: 580-307-7363					TPH GRO/DRO/ORO by 8015 BTEX by 8021 VOC by 8260 Metals 6010 Chloride 300.0 BGDOC NM GDOC TX					State							
Phone: 575-988-0055					Email: huttona@kfoc.net										NM CO UT AZ TX							
Email: agiovengo@ensolum.com															x							
Report due by:															Remarks							
Time Sampled	Date Sampled	Matrix	No. of Containers	Sample ID	Lab Number																	
8:45	12/19/2023	Soil	1	BH01 - 0'	1																	
8:50	12/19/2023	Soil	1	BH01 - 0.5'	2																	
8:56	12/19/2023	Soil	1	BH01 - 1'	3																	
9:05	12/19/2023	Soil	1	BH01 - 2'	4																	
Additional Instructions: Please CC: cburton@ensolum.com, agiovengo@ensolum.com, chamilton@ensolum.com, ehafft@ensolum.com - Samples kept on ice																						
I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabelling the sample location, date or time of collection is considered fraud and may be grounds for legal action.															Samples requiring thermal preservation must be received on ice the day they are sampled or received packed in ice at an avg temp above 0 but less than 6 °C on subsequent days.							
Sampled by: Ethan Haft																						
Relinquished by: (Signature)					Date		Time		Received by: (Signature)					Date		Time		Lab Use Only				
					12/20/23		0700							12/20/23		1030		Received on ice: (Y) N				
Relinquished by: (Signature)					Date		Time		Received by: (Signature)					Date		Time		T1 T2 T3				
					12-20-23		1545							12/20/23		17:15						
Relinquished by: (Signature)					Date		Time		Received by: (Signature)					Date		Time		AVG Temp °C				
					12/20/2023		22:30							12/21/23		845		4				
Sample Matrix: S - Soil, Sd - Solid, Sg - Sludge, A - Aqueous, O - Other															Container Type: g - glass, p - poly/plastic, ag - amber glass, v - VOA							
Note: Samples are discarded 30 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.																						

Envirotech Analytical Laboratory

Printed: 12/21/2023 12:36:07PM

Sample Receipt Checklist (SRC)

Instructions: Please take note of any NO checkmarks.

If we receive no response concerning these items within 24 hours of the date of this notice, all the samples will be analyzed as requested.

Client:	Kaiser Francis Oil Company	Date Received:	12/21/23 08:45	Work Order ID:	E312153
Phone:	(505) 382-1211	Date Logged In:	12/21/23 09:40	Logged In By:	Alexa Michaels
Email:	agiovento@ensolum.com	Due Date:	01/02/24 17:00 (5 day TAT)		

Chain of Custody (COC)

1. Does the sample ID match the COC? Yes
2. Does the number of samples per sampling site location match the COC? Yes
3. Were samples dropped off by client or carrier? Yes
4. Was the COC complete, i.e., signatures, dates/times, requested analyses? Yes
5. Were all samples received within holding time? Yes

Note: Analysis, such as pH which should be conducted in the field, i.e., 15 minute hold time, are not included in this discussion.

Carrier: Courier**Comments/Resolution****Sample Turn Around Time (TAT)**

6. Did the COC indicate standard TAT, or Expedited TAT? Yes

Sample Cooler

7. Was a sample cooler received? Yes
8. If yes, was cooler received in good condition? Yes
9. Was the sample(s) received intact, i.e., not broken? Yes
10. Were custody/security seals present? No
11. If yes, were custody/security seals intact? NA
12. Was the sample received on ice? If yes, the recorded temp is 4°C, i.e., 6°±2°C? Yes

Note: Thermal preservation is not required, if samples are received w/i 15 minutes of sampling

13. If no visible ice, record the temperature. Actual sample temperature: 4°C

Sample Container

14. Are aqueous VOC samples present? No
15. Are VOC samples collected in VOA Vials? NA
16. Is the head space less than 6-8 mm (pea sized or less)? NA
17. Was a trip blank (TB) included for VOC analyses? NA
18. Are non-VOC samples collected in the correct containers? Yes
19. Is the appropriate volume/weight or number of sample containers collected? Yes

Field Label

20. Were field sample labels filled out with the minimum information:
 - Sample ID? Yes
 - Date/Time Collected? Yes
 - Collectors name? Yes

Sample Preservation

21. Does the COC or field labels indicate the samples were preserved? No
22. Are sample(s) correctly preserved? NA
24. Is lab filtration required and/or requested for dissolved metals? No

Multiphase Sample Matrix

26. Does the sample have more than one phase, i.e., multiphase? No
27. If yes, does the COC specify which phase(s) is to be analyzed? NA

Subcontract Laboratory

28. Are samples required to get sent to a subcontract laboratory? No
29. Was a subcontract laboratory specified by the client and if so who? NA Subcontract Lab: NA

Client Instruction

Signature of client authorizing changes to the COC or sample disposition.

Date



envirotech Inc.



APPENDIX F

NMOCD Correspondence

From: [Wells, Shelly, EMNRD](#)
To: [Ashley Giovengo](#)
Cc: [Cole Burton](#); [Chad Hamilton](#); [Ethan Haft](#); [Hamlet, Robert, EMNRD](#); [Bratcher, Michael, EMNRD](#)
Subject: RE: [EXTERNAL] 48-hour Liner Inspection Notification - Kaiser Francis Oil Company - Brantley Fee BSS - Incident Number nAPP2329739162
Date: Monday, November 13, 2023 9:19:16 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

[**EXTERNAL EMAIL**]

Good morning Ashley,

The OCD has received your notification. Include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

Thank you,

Shelly

[Shelly Wells](#) * Environmental Specialist-Advanced
Environmental Bureau
EMNRD-Oil Conservation Division
1220 S. St. Francis Drive | Santa Fe, NM 87505
(505)469-7520 | Shelly.Wells@emnrd.nm.gov
<http://www.emnrd.state.nm.us/OCD/>

From: Ashley Giovengo <agiovengo@ensolum.com>
Sent: Friday, November 10, 2023 8:51 AM
To: Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>
Cc: Cole Burton <cburton@ensolum.com>; Chad Hamilton <chamilton@ensolum.com>; Ethan Haft <ehaft@ensolum.com>
Subject: [EXTERNAL] 48-hour Liner Inspection Notification - Kaiser Francis Oil Company - Brantley Fee BSS - Incident Number nAPP2329739162

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Hello,

We intend to perform a liner integrity inspection at Kaiser Francis Oil Company's Brantley Fee BSS Pad (nAPP2329739162) on Wednesday, November 15, 2023, at 09:30 am MST.

Please let us know if you plan to be onsite to oversee the inspection.

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

QUESTIONS

Action 306021

QUESTIONS

Operator: KAISER-FRANCIS OIL CO PO Box 21468 Tulsa, OK 74121146	OGRID: 12361
	Action Number: 306021
	Action Type: [C-141] Deferral Request C-141 (C-141-v-Deferral)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2329739162
Incident Name	NAPP2329739162 BRANTLEY FEE BS PAD @ 0
Incident Type	Fire
Incident Status	Deferral Request Received
Incident Facility	[fAPP2329736621] Brantley Fee BS Pad

Location of Release Source <i>Please answer all the questions in this group.</i>	
Site Name	BRANTLEY FEE BS PAD
Date Release Discovered	10/23/2023
Surface Owner	Private

Incident Details <i>Please answer all the questions in this group.</i>	
Incident Type	Fire
Did this release result in a fire or is the result of a fire	Yes
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release <i>Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.</i>	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Fire Production Tank Produced Water Released: 1 BBL Recovered: 1 BBL Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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QUESTIONS, Page 2

Action 306021

QUESTIONS (continued)

Operator: KAISER-FRANCIS OIL CO PO Box 21468 Tulsa, OK 74121146	OGRID:	12361
	Action Number:	306021
	Action Type:	[C-141] Deferral Request C-141 (C-141-v-Deferral)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	More info needed to determine if this will be treated as a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (2) an unauthorized release of a volume that: (a) results in a fire or is the result of a fire.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

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	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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.

I hereby agree and sign off to the above statement	Name: Aaron Daniels Email: AaronD@kfoc.net Date: 01/22/2024
--	---

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QUESTIONS, Page 3

Action 306021

QUESTIONS (continued)

Operator: KAISER-FRANCIS OIL CO PO Box 21468 Tulsa, OK 74121146	OGRID:	12361
	Action Number:	306021
	Action Type:	[C-141] Deferral Request C-141 (C-141-v-Deferral)

QUESTIONS**Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). 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 in feet below ground surface (ft bgs)	Between 26 and 50 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 200 and 300 (ft.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 500 and 1000 (ft.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 500 and 1000 (ft.)
Any other fresh water well or spring	Between 500 and 1000 (ft.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between ½ and 1 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Between 1 and 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Medium
A 100-year floodplain	Between ½ and 1 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

Requesting a remediation plan approval with this submission	Yes
Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No

Soil Contamination Sampling: (Provide the highest observable value for each, in milligrams per kilograms.)

Chloride (EPA 300.0 or SM4500 Cl B)	922
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	0
GRO+DRO (EPA SW-846 Method 8015M)	0
BTEX (EPA SW-846 Method 8021B or 8260B)	0
Benzene (EPA SW-846 Method 8021B or 8260B)	0

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.

On what estimated date will the remediation commence	01/22/2024
On what date will (or did) the final sampling or liner inspection occur	11/15/2023
On what date will (or was) the remediation complete(d)	01/22/2024
What is the estimated surface area (in square feet) that will be reclaimed	10795
What is the estimated volume (in cubic yards) that will be reclaimed	200
What is the estimated surface area (in square feet) that will be remediated	10795
What is the estimated volume (in cubic yards) that will be remediated	200

These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 4

Action 306021

QUESTIONS (continued)

Operator: KAISER-FRANCIS OIL CO PO Box 21468 Tulsa, OK 74121146	OGRID:	12361
	Action Number:	306021
	Action Type:	[C-141] Deferral Request C-141 (C-141-v-Deferral)

QUESTIONS**Remediation Plan (continued)**

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:

(Select all answers below that apply.)

(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for off-site disposal	OWL LANDFILL JAL [fJEG1635837366]
OR which OCD approved well (API) will be used for off-site disposal	Not answered.
OR is the off-site disposal site, to be used, out-of-state	Not answered.
OR is the off-site disposal site, to be used, an NMED facility	Not answered.
(Ex Situ) Excavation and on-site remediation (i.e. On-Site Land Farms)	Not answered.
(In Situ) Soil Vapor Extraction	Not answered.
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	Not answered.
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	Not answered.
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	Not answered.
Ground Water Abatement pursuant to 19.15.30 NMAC	Not answered.
OTHER (Non-listed remedial process)	Not answered.

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.

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.

I hereby agree and sign off to the above statement	Name: Aaron Daniels Email: AaronD@kfoc.net Date: 01/22/2024
--	---

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 5

Action 306021

QUESTIONS (continued)

Operator: KAISER-FRANCIS OIL CO PO Box 21468 Tulsa, OK 74121146	OGRID:	12361
	Action Number:	306021
	Action Type:	[C-141] Deferral Request C-141 (C-141-v-Deferral)

QUESTIONS**Deferral Requests Only**

Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.

Requesting a deferral of the remediation closure due date with the approval of this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Is the remaining contamination in areas immediately under or around production equipment where remediation could cause a major facility deconstruction	Yes
Please list or describe the production equipment and how (re)moving the equipment would cause major facility deconstruction	Beneath lined tank containment, and would require facility deconstruction of the tank battery.
What is the remaining surface area (in square feet) that will still need to be remediated if a deferral is granted	10795
What is the remaining volume (in cubic yards) that will still need to be remediated if a deferral is granted	200
Per Paragraph (2) of Subsection C of 19.15.29.12 NMAC if contamination is located in areas immediately under or around production equipment such as production tanks, wellheads and pipelines where remediation could cause a major facility deconstruction, the remediation, restoration and reclamation may be deferred with division written approval until the equipment is removed during other operations, or when the well or facility is plugged or abandoned, whichever comes first.	
Enter the facility ID (F#) on which this deferral should be granted	Brantley Fee BS Pad [fAPP2329736621]
Enter the well API (30-) on which this deferral should be granted	Not answered.
Contamination does not cause an imminent risk to human health, the environment, or groundwater	True
Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.	
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.	
I hereby agree and sign off to the above statement	Name: Aaron Daniels Email: AaronD@kfoc.net Date: 01/22/2024

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QUESTIONS, Page 6
Action 306021

QUESTIONS (continued)

Operator: KAISER-FRANCIS OIL CO PO Box 21468 Tulsa, OK 74121146	OGRID: 12361
	Action Number: 306021
	Action Type: [C-141] Deferral Request C-141 (C-141-v-Deferral)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	{Unavailable.}

Remediation Closure Request	
Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.	
Requesting a remediation closure approval with this submission	No

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

CONDITIONS

Action 306021

CONDITIONS

Operator: KAISER-FRANCIS OIL CO PO Box 21468 Tulsa, OK 74121146	OGRID: 12361
	Action Number: 306021
	Action Type: [C-141] Deferral Request C-141 (C-141-v-Deferral)

CONDITIONS

Created By	Condition	Condition Date
scwells	Deferral approved. Deferral of sample point BH01 (under tank battery) is approved until plugging and abandonment or a major facility deconstruction, whichever comes first. A complete and accurate remediation report and/or reclamation report will need to be submitted at that time.	3/27/2024