



August 6, 2024

Shelly Wells
Projects Environmental Specialist
New Mexico Energy, Minerals, and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

**Re: Closure Report
ConocoPhillips Company (Heritage COG Operating, LLC)
Honey Graham 29 State #006H Tank Battery Release
Unit Letter C, Section 29, Township 26 South, Range 28 East
Eddy County, New Mexico
Incident ID NAPP2313129153**

Ms. Wells:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (COPC) to assess and evaluate a release that occurred at the Honey Graham 29 State #006H Tank Battery. The release footprint is located in Public Land Survey System (PLSS) Unit Letter C, Section 29, Township 26 South, and Range 28 East, Eddy County, New Mexico (Site). The approximate release point occurred at coordinates 32.020024°, -104.110987°, as shown on Figures 1 and 2.

BACKGROUND

According to the State of New Mexico C-141 Initial Report (Appendix A), the Honey Graham 29 State 6H Tank Battery release was discovered on April 18, 2023. The release was caused by a hole at the bottom of a tank due to corrosion. The initial C-141 form for the release was submitted to the New Mexico Oil Conservation Division (NMOCD) on May 11, 2023. The NMOCD Incident ID for this release is NAPP2313129153.

After further investigation into the release volumes, COP representatives determined that the initial production measurement data provided in the initial C-141 was inaccurate. The impacts observed during the initial and additional assessment indicated a much smaller volume of fluids released as a result of the incident. After the revisions to the C-141, approximately 29 barrels (bbls) of crude oil and 10 bbls of produced water were reported released, of which there was no recovery. A revised C-141 form for the release incident was submitted to the NMOCD on September 7, 2023. The revised C-141 was accepted by OCD via email on September 8, 2023. The initial C-141 form is included in Appendix A.

LAND OWNERSHIP

According to the NMOCD Oil and Gas Map, the Site is located on State Trust Lands managed by the New Mexico State Land Office (NMSLO). A review of the NMSLO Land Status Map was completed, and the Site is located within active oil and gas lease ID V074750001, which is listed under EOG Resources Inc. The Site is also located in a commercial lease ID BL23580000, listed under COG Operating LLC. Based on guidance provided by the NMSLO, as the release footprint is located on an active oil and gas lease, and the footprint is wholly located within the boundaries of the active oil and gas lease, no Remediation Right of Entry (ROE) is required at the Site.

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CULTURAL PROPERTIES PROTECTION

In order to meet the requirements to perform reclamation activities on State Trust Lands, compliance with the cultural properties protection rule (NMAC 19.2.24) was required at the Site. The New Mexico Administrative Code (NMAC) 19.2.24.8 states “Any persons engaged in activities on state trust lands are subject to the requirements of the Cultural Properties Act, the Cultural Properties Protection Act, and 19.2.24.13 NMAC. Persons shall not disturb, dislodge, damage, destroy, or remove any cultural properties on state trust lands. Any project on state trust lands that has the potential to directly or indirectly damage cultural properties is additionally subject to the requirements of Subsections B, C, D, and E of 19.2.24.8 NMAC.”

Tetra Tech, on behalf of COP, contracted SWCA Environmental Consultants (SWCA) to conduct an intensive Class III pedestrian survey for the Honey Graham 29 State #006H Tank Battery release covering 0.13 acres (0.5 ha) on the SLO-managed land in Eddy County, New Mexico. On December 5, 2023, SWCA surveyed a total of 1.94 acres (0.79 ha), which includes a 100-foot buffer from the inadvertent release location footprint, located entirely on SLO-managed land. No archaeological sites or historic properties were observed during the investigation. No additional investigation or treatment was recommended regarding the current undertaking. If subsurface cultural material is encountered during remedial activities, all work will cease and the NMSLO will be notified immediately. The survey was submitted to the State Land Office on December 20, 2023. A copy of the NMCRIS Activity No. 154498 is included in Appendix C.

SITE CHARACTERIZATION

A site characterization was performed and no sinkholes, residences, schools, hospitals, institutions, churches, private domestic water wells, springs, playa lakes, wetlands, incorporated municipal boundaries, subsurface mines, or floodplains are located within the distances specified in 19.15.29.12 New Mexico Administrative Code (NMAC). Please note that no continuous or significant waterbody is within the lateral extent of the release; however, a New Mexico Office of the State Engineers (NMOSE) unnamed stream body does lie approximately 160 feet south of the release. A portion of the Site is located within a Federal Emergency Management Agency (FEMA) Zone A floodplain. The Site is in an area of high karst potential.

According to the New Mexico Office of the State Engineers (NMOSE) reporting system, there is one water well within ½ mile (800 meters) of the Site. The well has a depth to groundwater of 33 feet below ground surface (bgs). The site characterization data is included in Appendix D.

According to the New Mexico Bureau of Geology and Mineral Resources (NMBGMR) *Geologic Map of the Red Bluff 7.5-Minute Quadrangle, Eddy County, New Mexico*, the Site is underlain by the Salado Formation. The NMBGMR describes the Salado Formation as consisting of “invariably brecciated and/or karst-impacted halite/rock salt, anhydrite/gypsum potassium salts and lesser fine-grained clastic rocks and carbonates”.

REGULATORY FRAMEWORK

Based upon the release footprint and in accordance with Subsection E of 19.15.29.12 NMAC, per 19.15.29.11 NMAC, the site characterization data was used to determine recommended remedial action levels (RRALs) for benzene, toluene, ethylbenzene, and xylene (collectively referred to as BTEX), total petroleum hydrocarbons (TPH), and chlorides in soil.

Based on the site characterization (high karst) and in accordance with Table I of 19.15.29.12 NMAC, the RRALs for the Site are as follows:

Constituent	Site RRALs
Chloride	600 mg/kg
TPH	100 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

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INITIAL ASSESSMENT ACTIVITIES

On April 24, 2023, Carmona Resources (on behalf of ConocoPhillips) personnel collected assessment samples from seven (7) locations (S-1 through S-7) within the reported release extent and seven (7) locations (H-1 through H-7) around the perimeter of the reported release extent. The assessment was conducted with the liner, piping, and infrastructure present within the tank battery. A total of forty-five (45) soil samples were collected and sent to Eurofins Environmental Testing in Midland, Texas to be analyzed for chloride via EPA Method 300.0, TPH via EPA Method 8015 NM, and BTEX via EPA Method 8021B.

The analytical results associated with S-1 and S-3 through S-6 exceeded the Site RRALs for chloride, BTEX and/or TPH to a depth of 5 feet bgs. Analytical results from S-7 (0-1') and H-7 (0-0.5') exceeded the Site RRAL for TPH. The remaining analytical results were below Site RRALs.

ADDITIONAL ASSESSMENT ACTIVITIES

On July 18, 2023, Tetra Tech personnel conducted additional assessment activities on behalf of ConocoPhillips. Two tanks, the northernmost and southernmost, were removed prior to the additional assessment. As a portion of the additional assessment activities, the perimeter fence and earthen berm were removed to provide access to the battery interior. A total of three (3) soil borings (BH-1 through BH-3) were installed with an air rotary drilling rig to attempt vertical delineation. BH-1 was installed within the approximate center of the southernmost tank footprint; BH-2 was installed east of BH-1 (in the approximate location of S-6); and BH-3 was installed within the footprint of the northernmost tank. On July 20, 2023, Tetra Tech returned to the Site to install one (1) additional soil boring (AH-1) via hand auger south of the battery to complete horizontal delineation for the site.

A total of twenty-five (25) soil samples were collected during the July 2023 assessment and sent to Cardinal Laboratories in Hobbs, New Mexico to be analyzed for chloride via Standard Method 4500Cl-B, TPH via EPA Method 8015M, and BTEX via EPA Method 8021B.

2023 REMEDIATION WORK PLAN

A Release Characterization Work Plan (Work Plan) was prepared by Tetra Tech on behalf of COP and submitted to NMOCD on September 29, 2023, via the online fee portal. The Work Plan described the results of the release assessments and provided characterization of the site. Furthermore, the Work Plan contained a request for a variance of the site-specific RRALs based on naturally occurring chloride in soils as described previously in the Site Characterization section of this report. A variance request to collect confirmation samples to be representative of no more than 400 square feet was also included in the Work Plan.

The Work Plan was denied via email by Shelly Wells of the NMOCD on Tuesday, December 26, 2023, with the following reasoning:

- *"Remediation plan denied. Request for variance on background chloride concentrations is denied. Both Table 1 and Table 2 show several chloride samples below 100 ppm. Request for a variance to collect confirmation samples at every 400 square feet is approved."*

REVISED REMEDIATION WORK PLAN

Based on the NMOCD rejection, and the collected analytical results, the proposed remedial action was revised. In the revisions, ConocoPhillips proposed to remove the identified material at the Site which exceeded the RRALs.

The Revised Release Characterization and Remediation Work Plan (Revised Work Plan) was prepared by Tetra Tech on behalf of COP and submitted to NMOCD on February 8, 2024. The Revised Work Plan was approved via email by Shelly Wells of the NMOCD on Friday, February 9, 2024, with the following comment:

- *"Please Submit closure report to OCD by 5/9/2024."*

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On May 8, 2024, Tetra Tech requested a 90-day extension on behalf of COPC to complete remedial activities at the Site. The extension request was approved by the NMOCD on May 8, 2024, for a due date of August 6, 2024. Copies of the regulatory correspondence are included in Appendix B.

NMSLO ECO CORRESPONDENCE

The approved Revised Work Plan dated February 8, 2024, describing the Site assessment and proposed remedial activities was submitted via email to the NMSLO Environmental Compliance Office (ECO) on February 20, 2024. The Revised Work Plan was approved by Tami Knight on March 4, 2024, with the following comments:

- *"The NMSLO Environmental Compliance Office (ECO) has reviewed the subject remediation plan, and based on the information provided in the document received from your office, ECO has approved the remediation plan. Please submit the remediation closure report to eco@slo.state.nm.us."*

Regulatory correspondence is included in Appendix B.

REMEDIAL ACTIVITIES AND CONFIRMATION SAMPLING

From May 21 to June 14, 2024, Tetra Tech personnel were onsite to supervise the remediation and reclamation activities proposed in the approved Revised Work Plan, including excavation, disposal, and confirmation sampling. Prior to confirmation sampling, in accordance with Subsection D of 19.15.29.12 NMAC, on May 17, 2024, an attempt was made to notify the NMOCD district office via the OCD Portal. The OCD Portal was temporarily down for maintenance and only accessible internally. An email was sent to NMOCD documenting the outage. Per Shelly Wells of the NMOCD, a variance was approved for the sampling notification. In accordance with the approved variance, the NMOCD district office was again notified via the OCD portal on May 2024, with a note for the notification to be backdated. Documentation of associated regulatory correspondence is included in Appendix B.

Soils exceeding the proposed action limits were excavated as indicated in Figure 5. The areas within the release footprint were excavated to a maximum depth of 19 feet below surrounding grade. Based on OSHA regulations, benching protection systems were utilized for this project as the excavation was greater than 5 feet in depth. The sides of the excavation were benched to form a series of horizontal levels, with near-vertical surfaces between levels. Photographs from the excavated areas prior to backfill are provided in Appendix E.

All excavated material was transported offsite for proper disposal. Approximately 2,933 cubic yards of material were transported to the R360 Permian Basin facility in Orla, Texas. Due to the file size of the waste manifests, they are not included in this report. Copies of the waste manifests are available upon request.

Following excavation, confirmation floor and sidewall samples were collected and submitted for laboratory analysis to verify efficacy of remediation activities. Per the NMOCD-approved confirmation sampling plan, confirmation samples were collected such that each 5-point composite sample (sidewall and floor) was representative of no more than 400 square feet of excavated area. Seven (7) five-point composite confirmation floor samples and nine (9) five-point composite confirmation sidewall sample locations were collected for laboratory analysis during remedial activities. Confirmation floor sample locations were labeled with "FS"-#. Confirmation sidewall sample locations were labeled with the cardinal direction (N, E, S, W) followed by SW-#.

Initial confirmation soil sampling analytical results associated with locations FS-2, FS-3, FS-5, FS-7, ESW-3, SSW-1, WSW-1, and WSW-2 exceeded the TPH RRAL of 100 mg/kg, and/or the chloride RRAL of 600 mg/kg. After the areas identified with exceedances were deepened and/or expanded, iterative confirmation samples were collected to encompass the original sample locations that triggered removal (nomenclature defined in Table 3) post-additional excavation. Final excavated areas, depths, and representative confirmation sample locations are indicated in Figure 5.

Collected confirmation samples were placed into laboratory-provided sample containers, transferred under chain-of-custody, and analyzed within appropriate holding times by Cardinal. The soil samples were

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analyzed for TPH (GRO+DRO+MRO) by EPA Method 8015M, BTEX by EPA Method 8021B, and chlorides by SM4500Cl-B. The analytical results were directly compared to the established Site RRLs to demonstrate compliance.

The results of the May and June 2024 confirmation sampling events are summarized in Table 3. All final confirmation soil samples (floor and sidewall) were below applicable cleanup levels for chloride, TPH, and BTEX. Copies of laboratory analysis and chain-of-custody documentation are included in Appendix F.

RECLAMATION ACTIVITIES

Based on 19.15.29.13 NMAC, all areas disturbed by the remediation within the former tank battery area have been reclaimed. Collected confirmation samples were placed into laboratory-provided sample containers, transferred under chain-of-custody, and analyzed within appropriate holding times by Cardinal. The soil samples were analyzed for TPH (GRO+DRO+MRO) by EPA Method 8015M, BTEX by EPA Method 8021B, and chlorides by SM4500Cl-B. All final confirmation soil samples (floor and sidewall) were below applicable cleanup levels for chloride, TPH and BTEX.

Once acceptable confirmation sample results were received, the excavation was backfilled with clean material to pre-release grade. In accordance with 19.15.29.12 NMAC, the reclaimed area contained a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by SM4500Cl-B. The soil cover included a top layer consisting of one foot of suitable material to establish vegetation at the site. The backfilled areas in the former tank battery area and pasture were seeded following backfilling, to aid in revegetation. Based on the soils of the site, the NMSLO Loamy (L) Sites Seed Mixture was used for seeding and was planted in the amount specified in the pounds pure live seed (PLS) per acre. One (1) representative 5-point composite sample was collected from the backfill material used for the reclamation of the project site. The reclaimed area is indicated in Figure 6. Soil backfill composite sampling results are summarized in Table 4. Copies of laboratory analysis and chain-of-custody documentation are included in Appendix F.

Site inspections will be performed annually to assess the revegetation progress and evaluate the site for the presence of primary or secondary noxious weeds. If noxious weeds are identified, the NMSLO will be contacted to determine an effective method for eradication. If the site does not show revegetation after one growing season, the area will be reseeded as appropriate. The NMSLO seed mixture details in corresponding pounds per live seed per acre are included in Appendix H. Reclamation activities have been implemented in consultation with the State Land Office in accordance with 19.2.100.67 NMAC for surface reclamations on State Oil and Gas Leases.

CONCLUSION

ConocoPhillips respectfully requests closure of the incident based on the confirmation sampling results and remedial activities performed. The final C-141 forms are enclosed in Appendix A. The impacted surface area was remediated to meet the standards of Table I of 19.15.29.12 NMAC.

If you have any questions concerning the remediation activities for the Site, please call me at (512) 560-9064 or Christian at (512) 338-2861.

Sincerely,
Tetra Tech, Inc.



Nicholas M. Poole, G.I.T.
Project Manager



Christian M. Llull, P.G.
Program Manager

cc:
Mr. Ike Tavarez, RMR – ConocoPhillips
Ms. Tami Knight - NMSLO

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LIST OF ATTACHMENTS

Figures:

- Figure 1 – Overview Map
- Figure 2 – Site Location/Topographic Map
- Figure 3 – Approximate Release Extent and Site Assessment (Tetra Tech 2019)
- Figure 4 – Approximate Release Extent and Additional Assessment (Tetra Tech 2023)
- Figure 5 – Remediation Extent and Confirmation Sampling
- Figure 6 – Reclamation / Restoration Area

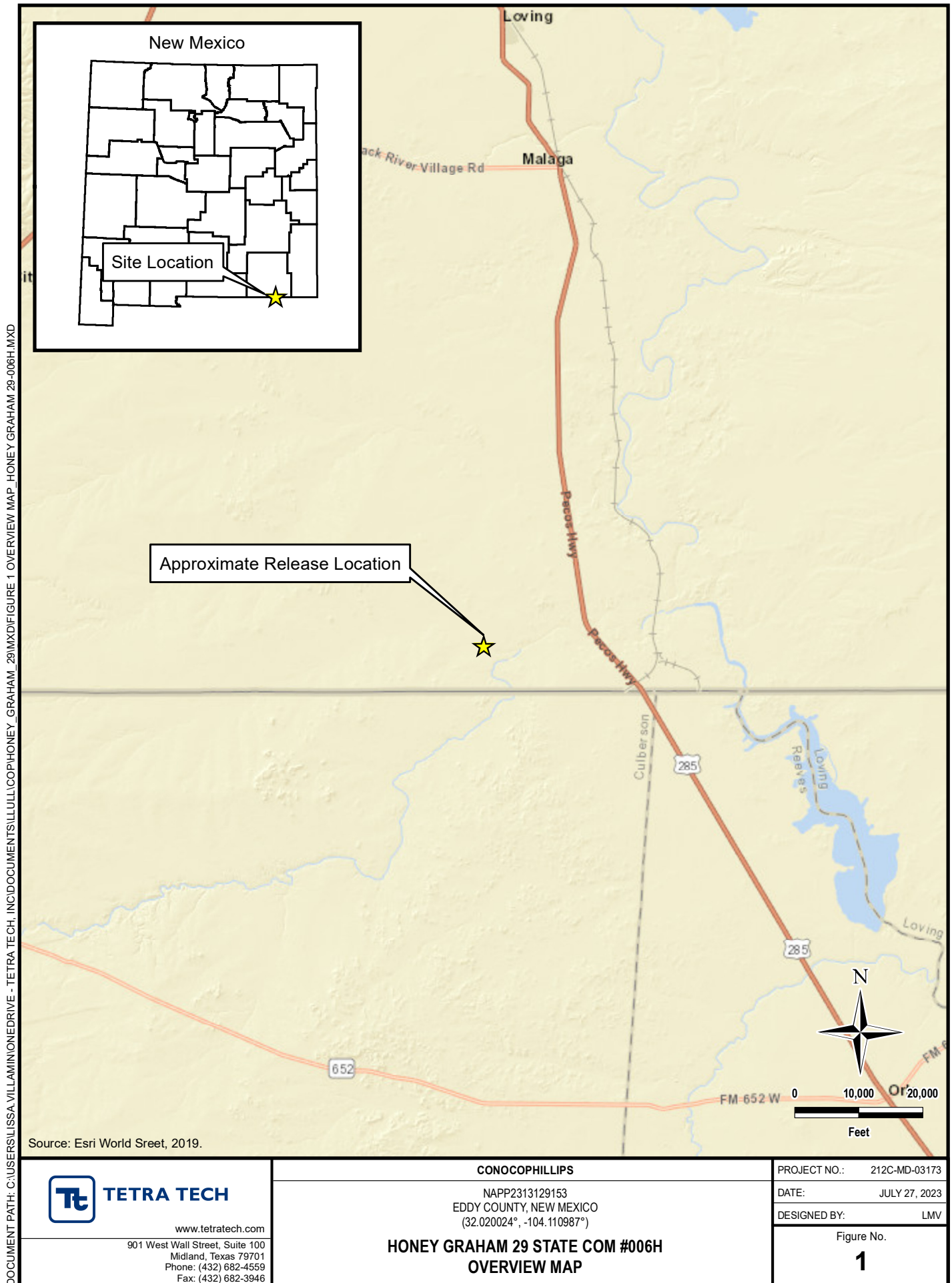
Tables:

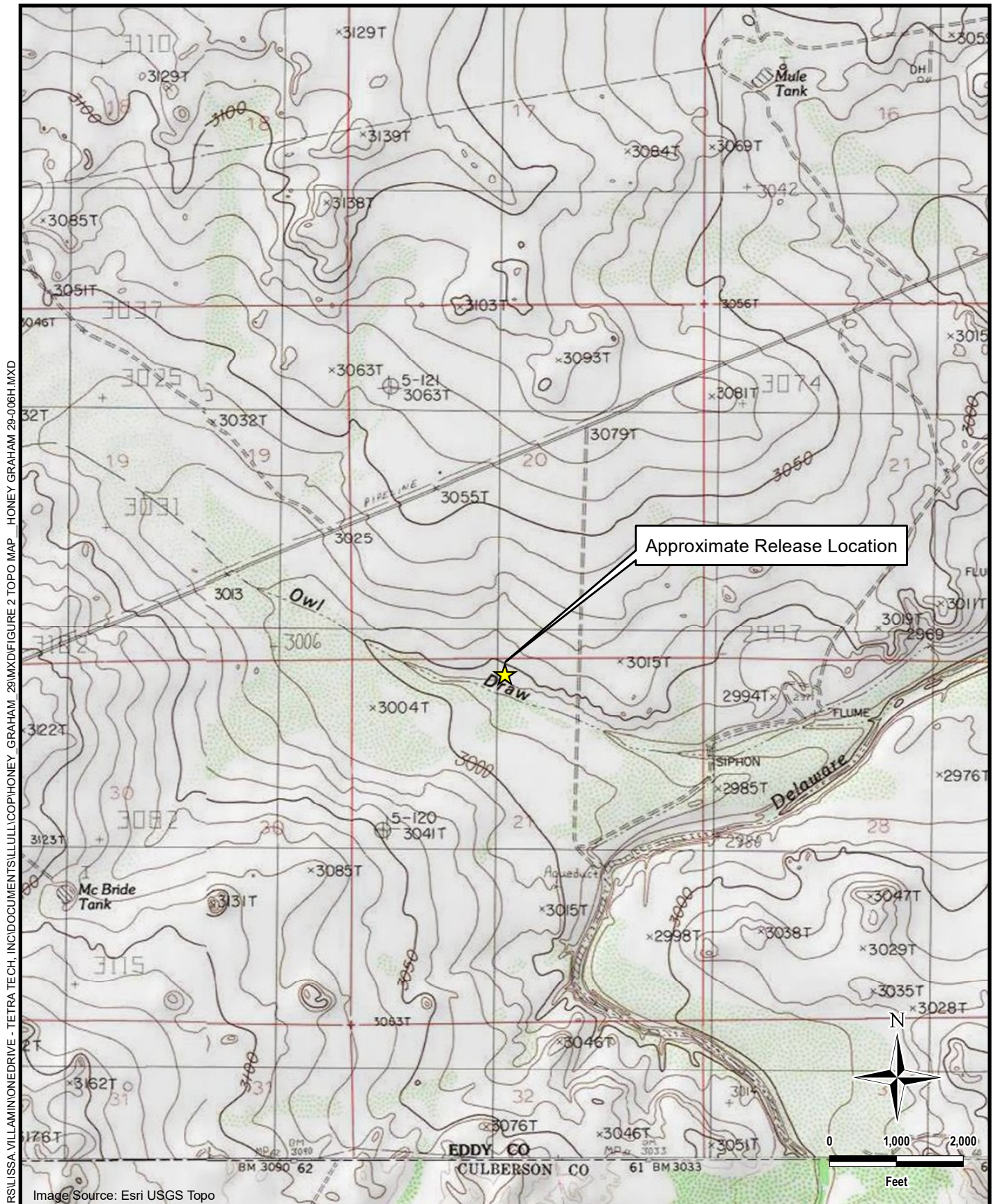
- Table 1 – Summary of Analytical Results – Soil Assessment (Carmona Resources)
- Table 2 – Summary of Analytical Results – 2023 Soil Assessment
- Table 3 – Summary of Analytical Results – 2024 Soil Confirmation Sampling
- Table 4 – Summary of Analytical Results – 2024 Soil Backfill

Appendices:

- Appendix A – C-141 Forms
- Appendix B – Regulatory Correspondence
- Appendix C – Cultural Survey
- Appendix D – Site Characterization Data
- Appendix E – Photographic Documentation
- Appendix F – Analytical Laboratory Data (Remediation and Backfill)

FIGURES





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CONOCOPHILLIPS

NAPP2313129153
EDDY COUNTY, NEW MEXICO
(32.020024°, -104.110987°)

**HONEY GRAHAM 29 STATE COM #006H
TOPOGRAPHIC MAP**

PROJECT NO.: 212C-MD-03173

DATE: JULY 27, 2023

DESIGNED BY: LMV

Figure No.

2

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CONOCOPHILLIPS

NAPP2313129153
EDDY COUNTY, NEW MEXICO
(32.020024°, -104.110987°)

HONEY GRAHAM 29 STATE COM #006H
APPROXIMATE RELEASE EXTENT AND SITE ASSESSMENT (CARMONA)

PROJECT NO.: 212C-MD-03173

DATE: JULY 28, 2023

DESIGNED BY: LMV

Figure No.

3

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EDDY COUNTY, NEW MEXICO
(32.020024°, -104.110987°)

**HONEY GRAHAM 29 STATE COM #006H
ADDITIONAL ASSESSMENT (TETRA TECH)**

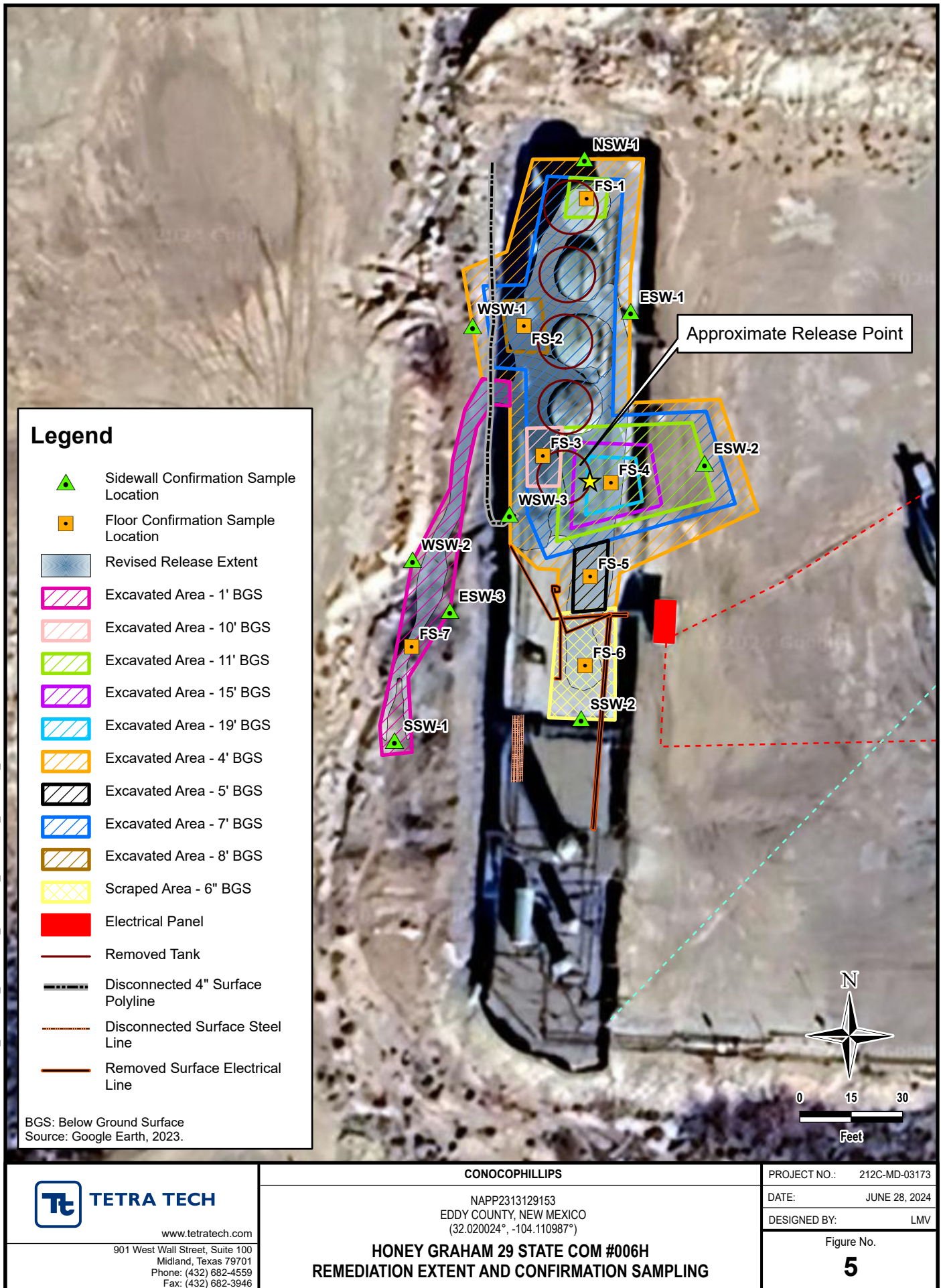
PROJECT NO.: 212C-MD-03173

DATE: JULY 31, 2023

DESIGNED BY: LMV

Figure No.

4





Legend

- Reclamation Area
- Electrical Panel
- Disconnected 4" Surface Polyline
- Disconnected Surface Steel Line
- Subsurface Electrical Line
- Subsurface Flowline

Source: Google Earth, 2023.



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**HONEY GRAHAM 29 STATE COM #006H
REMEDATION EXTENT AND CONFIRMATION SAMPLING**

PROJECT NO.: 212C-MD-03173

DATE: JUNE 28, 2024

DESIGNED BY: LMV

Figure No.

6

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TABLES

TABLE 1

SUMMARY OF ANALYTICAL RESULTS

SOIL ASSESSMENT (CARMONA RESOURCES) - NAPP2313129153

CONOCOPHILLIPS

HONEY GRAHAM 29 STATE 6H TANK BATTERY RELEASE

EDDY COUNTY, NM

Sample ID	Sample Date	Sample Depth	Chloride ¹		BTEx ²										TPH ³							
					Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		MRO		Total TPH	
		ft. bgs	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	(GRO+DRO+EXT DF)	
S-1	4/24/2023	0-1.0	80.8		1.16		18.6		19.1		55.6		94.5		3330		9080		<498	U	12400	
		1.5	373		0.157		0.922		1.03		4.59		6.7		292		915		<50.0	U	1210	
		2.0	106		0.0365		<0.0200	u	<0.0200	U	<0.0401	U	0.0646		<49.9	U	87.9		<49.9	U	87.9	
		3.0	114		<0.0199	U	<0.0199	U	<0.0199	U	0.134		0.134		<49.9	U	78.0		<49.9	U	78	
		4.0	134		<0.00994	U	0.0207		0.0676		0.162		0.25		<49.9	U	203		<49.9	U	203	
		5.0	127		<0.00998	U	0.022		0.0653		0.21		0.297		<49.8	U	183		<49.8	U	183	
S-2	4/24/2023	0-1.0	445		<0.00198	U	<0.00198	U	<0.00198	U	<0.00396	U	<0.00396	U	<50.0	U	<50.0	U	<50.0	U	<50.0	
		1.5	26.5		<0.00199	U	<0.00199	U	<0.00199	U	<0.00398	U	<0.00398	U	<50.0	U	<50.0	U	<50.0	U	<50.0	
		2.0	155		<0.00200	U	<0.00200	U	<0.00200	U	<0.00399	U	<0.00399	U	<50.0	U	<50.0	U	<50.0	U	<50.0	
		3.0	508		<0.00202	U	<0.00202	U	<0.00202	U	<0.00403	U	<0.00403	U	<49.9	U	72.4		<49.9	U	72.4	
S-3	4/24/2023	0-1.0	86.2		2.53		26.2		21.7		71.8		122		2120		3960		<249	U	6080	
		1.5	19.7		1.13		16.1		11.8		42.4		71.4		533		384		<49.9	U	917	
		2.0	23.1		0.554		8.91		4.19		21.0		34.6		719		792		<49.9	U	1510	
		3.0	184		4.14		38.5		21.2		76.5		140		2100		2200		<50.0	U	4300	
		4.0	195		2.00		22.5		15.3		50.9		90.7		1160		1390		<50.0	U	2550	
		5.0	339		0.267		0.836		0.913		4.67		6.69		235		676		<50.0	U	911	
S-4	4/24/2023	0-1.0	66.4		0.585		11.5		14.2		49.2		75.5		1690		3600		<249	U	5290	
		1.5	95.7		4.40		35.5		23.5		73.4		137		3490		4740		<249	U	8230	
		2.0	162		6.20		53.2		27.5		98.2		185		3370		3440		<50.0	U	6810	
		3.0	294		0.115		0.462		0.893		2.77		4.24		257		1210		<49.9	U	1470	
		4.0	186		<0.100	U	<0.100	U	0.220		0.953		1.17		85.3		373		<49.8	U	458	
		5.0	204		<0.00199	U	0.00204		0.00580	F1	0.0328	F1	0.0406		<50.0	U	110		<50.0	U	110	
S-5	4/24/2023	0-1.0	389		<0.0998	U	<0.0998	U	<0.0998	U	<0.200	U	<0.200	U	<49.9	U	160		<49.9	U	160	
		1.5	1060		<0.101	U	<0.101	U	<0.101	U	<0.201	U	<0.201	U	<49.9	U	<49.9	U	<49.9	U	<49.9	
		2.0	1080		<0.0998	U	<0.0998	U	<0.0998	U	<0.200	U	<0.200	U	<49.9	U	135		<49.9	U	135	
		3.0	1060		<0.0996	U	<0.0996	U	<0.0996	U	<0.199	U	<0.199	U	<49.8	U	<49.8	U	<49.8	U	<49.8	
		4.0	816		<0.00199	U	<0.00269		<0.00199	U	<0.00398	U	<0.00398	U	<50.0	U	<50.0	U	<50.0	U	<50.0	
		5.0	964		<0.00200	U	<0.00339		<0.00200	U	<0.00399	U	<0.00399	U	<50.0	U	<50.0	U	<50.0	U	<50.0	
S-6	4/24/2023	0-1.0	173		0.726		9.35		4.85		23.1		38.1		5240		8100		1070		14400	
		1.5	343		0.673		9.11		5.66		24.1		39.6		2160		3220		440		5820	
		2.0	584	F1	3.42		34.0		23.0		80.4		141		2770		3760		500		7030	
		3.0	1240		7.64		59.6		33.9		125		226		6010		7380		959		14300	
		4.0	1210		3.71		45.6		29.7		114		193		5040		7570		937		13500	
		5.0	594		5.61		45.6		24.3		87.7		163		4570		6210		774		11600	
S-7	4/24/2023	0-1.0	231		<0.00199	U	<0.00199	U	<0.00199	U	<0.00398	U	<0.00398	u	95.9		91.1		<50.0	U	187	
		1.5	418		<0.00198	U	<0.00198	U	<0.00198	U	<0.00396	U	<0.00396	U	<50.0	U	<50.0	U	<50.0	U	<50.0	
		2.0	252		<0.00199	U	<0.00199	U	<0.00199	U	<0.00398	U	<0.00398	u	<49.8	U	<49.8	U	<49.8	U	<49.8	
		3.0	263		<0.00200	U	<0.00200	U	<0.00200	U	<0.00399	U	<0.00399	u	<49.9	U	<49.9	U	<49.9	U	<49.9	
H-1	4/24/2023	0-0.5	57.0		<0.00199	U	<0.00199	U, F1	<0.00199	U, F1	<0.00398	U, F1	<0.00398	U	<50.0	U	63.7		<50.0	U	63.7	
H-2	4/24/2023	0-0.5	102		<0.00199	U	<0.00199	U	<0.00199	U	<0.00398	U	<0.00398	U	<49.9	U	<49.9	U	<49.9	U	<49.9	
H-3	4/24/2023	0-0.5	361	F1	<0.00200	U	<0.00200	U	<0.00200	U	<0.00399	U	<0.00399	U	<49.8	U	<49.8	U	<49.8	U	<49.8	
H-4	4/24/2023	0-0.5	266		<0.00201	U	<0.00201	U	<0.00201	U	<.00402	U	<0.00402	U	<49.9	U	<49.9	U	<49.9	U	<49.9	
H-5	4/24/2023	0-0.5	227		<0.00202	U	<0.00202	U	<0.00202	U	<0.00404	U	<0.00404	U	<49.9	U	<49.9	U	<49.9	U	<49.9	
H-6	4/24/2023	0-0.5	97.9		<0.00199	U	<0.00199	U	<0.00199	U	<0.00398	U	<0.00398	U	<50.0	U	<50.0	U	<50.0	U	<50.0	
H-7	4/24/2023	0-0.5	114		<0.00199	U	<0.00199	U	<0.00199	U	<0.00398	U	<0.00398	U	<49.9	U	188		<49.8	U	188	

NOTES:

ft. Feet

bgs Below ground surface

mg/kg Milligrams per kilogram

TPH Total Petroleum Hydrocarbons

GRO Gasoline range organics

DRO Diesel range organics

1 Method SM4500Cl-B

2 Method 8021B

3 Method 8015M

Bold and italicized values indicate exceedance of proposed Site RRALs.

Shaded rows indicate intervals proposed for excavation.

QUALIFIERS:

U Indicates the analyte was analyzed but not detected

F1 MS and/or MSD recovery exceeds control limits

TABLE 2

SUMMARY OF ANALYTICAL RESULTS

2023 SOIL ASSESSMENT (TETRA TECH) - NAPP2313129153

CONOCOPHILLIPS

HONEY GRAHAM 29 STATE 6H TANK BATTERY RELEASE

EDDY COUNTY, NM

Sample ID	Sample Date	Sample Depth	Field Screening Results		Chloride ¹		BTEx ²										TPH ³							
							Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEx		GRO		DRO		EXT DRO		Total TPH (GRO+DRO+EXT DRO)	
			C ₆ - C ₁₀														> C ₁₀ - C ₂₈		> C ₂₈ - C ₃₆					
		ft. bgs	ppm		mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	
BH-1	7/18/2023	0-1			2,240		<2.00		24.0		20.0		102		146		4,250		9,290		1,400		14,940	
		2-3			464		<1.00		13.5		13.2		73.4		100		2,530		6,520		963		10,013	
		4-5			1,040		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		34.5		<10.0		34.5	
		6-7			896		0.235		3.78		2.54	QM-07	13.8	QM-07	20.4		633		1,540		232		2,405	
		9-10			1,650		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		12-13			224		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		20.0		<10.0		20.0	
		14-15			192		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		27.1		15.4		42.5	
BH-2	7/18/2023	0-1			32.0		<1.00		9.30		14.7		47.5		71.5		2,760		8,790		1,440		12,990	
		2-3			32.0		0.435		6.89		9.74		35.5		52.5		1,450		3,460		540		5,450	
		4-5			144		2.93		32.4		18.7		104		158		3,100		6,390		924		10,414	
		6-7			80.0		<0.050		<0.050		<0.050		0.323		0.323		21.6		703		136		861	
		9-10			448		<0.050		0.943		1.38		8.04		10.4		244		2,380		409		3,033	
		12-13			192		<0.050		1.41		2.59		12.0		16.0		898	QM-07,QR-03	8,460	QM-07	1,320		10,678	
		14-15			368		<0.050		0.057		0.109		0.617		0.783		47.2		925		205		1177.2	
		15-16			64.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		113		51.2		164.2	
		16-17			336		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		423		350		773	
17-18			672		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		234		63.7		297.7			
BH-3	7/18/2023	0-1			544		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		17.6		<10.0		17.6	
		2-3			688		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		4-5			64.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		6-7	1,210	100	48.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		9-10	1,110	650	752		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		12-13			464		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		14-15	673		208		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
AH-1	7/20/2023	0-1			112.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	

NOTES:

- ft. Feet
- bgs Below ground surface
- mg/kg Milligrams per kilogram
- TPH Total Petroleum Hydrocarbons
- GRO Gasoline range organics
- DRO Diesel range organics
- 1 Method SM4500Cl-B
- 2 Method 8021B
- 3 Method 8015M

Bold and italicized values indicate exceedance of proposed RRALs and Reclamation Requirements.

Shaded rows indicate intervals proposed for excavation.

QUALIFIERS:

- QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
- QR-03 The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to matrix interference. QC batch accepted based on LCS and/or LCSD recovery and/or RPD values.

TABLE 3
SUMMARY OF ANALYTICAL RESULTS
2024 SOIL CONFIRMATION SAMPLING - NAPP2313129153
CONOCOPHILLIPS
HONEY GRAHAM 29 STATE 6H TANK BATTERY RELEASE
EDDY COUNTY, NM

Sample ID	Sample Date	Sample Depth	Chloride ¹		BTEX ²										TPH ³						
					Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		EXT DRO		Total TPH (GRO+DRO+EXT DRO)
															C ₆ - C ₁₀		> C ₁₀ - C ₂₈		> C ₂₈ - C ₃₆		
		ft. bgs	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	
FS-1	6/4/2024	11	160		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	
FS-2	5/28/2024	7	544		<0.050		<0.050		0.082		0.476		0.558		14		263		26.8	303.8	
FS-2	6/4/2024	8	144		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	
FS-3	5/28/2024	7	464		3.4		33.6		16.1		81.1		134		3,020		3,880		409	7,309	
FS-3	6/4/2024	10	96		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	
FS-4	6/5/2024	19	416		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	
FS-5	5/28/2024	4	656		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	
FS-5	6/4/2024	5	112		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	
FS-6	5/28/2024	0.5	48		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	
FS-7	5/24/2024	0.5	1,260		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	
FS-7	5/31/2024	1	336		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	
NSW - 1	5/28/2024	-	544		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	
ESW-1	5/28/2024	-	368		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	
ESW-2	5/31/2024	-	480		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		23.3		<10.0	23.3	
ESW-3	5/24/2024	-	1,340		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	
ESW-3 (4')	5/31/2024	-	608		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		10.5		<10.0	10.5	
ESW-3 (6')	6/4/2024	-	128		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	
SSW - 1	5/24/2024	-	1,120		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	
SSW-1 (4')	5/31/2024	-	272		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	
SSW - 2	5/28/2024	-	144		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	
WSW - 1	5/28/2024	-	880		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	
WSW-1 (6')	5/31/2024	-	80		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	
WSW - 2	5/24/2024	-	1,380		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	
WSW-2 (4')	5/31/2024	-	112		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	
WSW - 3	5/28/2024	-	160		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		32.8		<10.0	32.8	

NOTES:

ft. Feet

bgs Below ground surface

mg/kg Milligrams per kilogram

TPH Total Petroleum Hydrocarbons

GRO Gasoline range organics

DRO Diesel range organics

1 Method SM4500Cl-B

2 Method 8021B

3 Method 8015M

Bold and italicized values indicate exceedance of Site RRALs approved by the NMOCD.

Green highlight represents soil intervals that were removed during horizontal expansion of excavation sidewalls.

Gold highlight represents soil horizons that were removed during deepening of excavation floors.

* These iterative samples are located to encompass the original sample location that triggered removal, with further excavation in each area indicated in ().

Italicized and underlined values indicate areas that were lined prior to backfilling.

QUALIFIERS:

TABLE 4
SUMMARY OF ANALYTICAL RESULTS
2024 SOIL BACKFILL - NAPP2313129153
CONOCOPHILLIPS
HONEY GRAHAM 29 STATE 6H TANK BATTERY RELEASE
EDDY COUNTY, NM

Sample ID	Sample Date	Chloride ¹		BTEX ²										TPH ³						
				Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		EXT DRO		Total TPH (GRO+DRO+EXT DRO)
														C ₆ - C ₁₀		> C ₁₀ - C ₂₈		> C ₂₈ - C ₃₆		
		mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	
BACKFILL - COMPOSITE	2/15/2024	224		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0	-	

NOTES:

- bgs Below ground surface
mg/kg Milligrams per kilogram
TPH Total Petroleum Hydrocarbons
GRO Gasoline range organics
DRO Diesel range organics
1 Method SM4500Cl-B
2 Method 8021B
3 Method 8015M

APPENDIX A

C-141 Forms

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	
District RP	
Facility ID	
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

Latitude _____ Longitude _____
(NAD 83 in decimal degrees to 5 decimal places)

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

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)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input type="checkbox"/> 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

<input type="checkbox"/> The source of the release has been stopped.	
<input type="checkbox"/> The impacted area has been secured to protect human health and the environment.	
<input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
<input type="checkbox"/> 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 _____	Title: _____
Signature: <u>Patricia Espinoza</u>	Date: _____
email: _____	Telephone: _____
<u>OCD Only</u>	
Received by: _____	Date: _____

L48 Spill Volume Estimate Form - Fill In Gray Cells

Facility Name & Well Number(s):				Honey Graham 29 State Com 6H			Release Discovery Date & Time:		4/18/23 12:00 AM				
Provide any known details about the event:				Revision to initial volume estimate			Primary Cause (dropdown):		Secondary Cause (dropdown):				
				Recovered Volume (bbl.) (if available, not included in volume calculations)	Method of Determination (dropdown)	Release Type (dropdown):	> 1/2" of Rain in Last 24 Hours (dropdown):		% Rainwater Recovered (not included in volume calculations, informational):				
BU:	Permian	Asset Area:	DBW - Gypsum Land Complex		Field Measurement	Oil Mixture	No						
Known Volume (dropdown):				No									
Known Area (dropdown):				No									
Spill Calculation - Subsurface Spill - Rectangle												Remediation Recommendation	
Convert Irregular shape into a series of rectangles	Length (ft.)	Width (ft.)	Average Depth (in.)	On/Off Pad (dropdown)	Soil Spilled-Fluid Saturation (%)	Estimated volume of each area (bbl.)	Total Estimated Volume of Spill (bbl.)	Percentage of Oil if Spilled Fluid is a Mixture (%)	Total Estimated Volume of Spilled Oil (bbl.)	Total Estimated Volume of Spilled Liquid other than Oil (bbl.)	Total Estimated Contaminated Soil, uncompacted, 25% (yd³.)	Current Rule of Thumb - RMR Handover Volume, (yd³.)	
Rectangle A	170.0	35.0	3.0	Off-Pad	14.60%	264.78	38.66	75%	28.99	9.66	68.87	750	
Rectangle B				Off-Pad	14.60%	0.00	0.00		0.00	0.00	0.00		
Rectangle C				Off-Pad	14.60%	0.00	0.00		0.00	0.00	0.00		
Rectangle D				Off-Pad	14.60%	0.00	0.00		0.00	0.00	0.00		
Rectangle E				Off-Pad	14.60%	0.00	0.00		0.00	0.00	0.00		
Rectangle F						0.00					0.00		
Rectangle G						0.00					0.00		
Rectangle H						0.00					0.00		
Rectangle I						0.00					0.00		
						0.00							0.00
Total Subsurface Volume Released:							38.6572		28.9929	9.6643	68.87	BU	

Incident ID	
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?	_____ (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input type="checkbox"/> 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)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input type="checkbox"/> 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.

<p>Characterization Report Checklist: <i>Each of the following items must be included in the report.</i></p> <div><input type="checkbox"/> Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.<input type="checkbox"/> Field data<input type="checkbox"/> Data table of soil contaminant concentration data<input type="checkbox"/> Depth to water determination<input type="checkbox"/> Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release<input type="checkbox"/> Boring or excavation logs<input type="checkbox"/> Photographs including date and GIS information<input type="checkbox"/> Topographic/Aerial maps<input type="checkbox"/> Laboratory data including chain of custody</div>

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.

Incident ID	
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: _____ Title: _____

Signature: _____  Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

Incident ID	
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: _____ Title: _____
Signature: _____ Date: _____
email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

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

Signature: _____ Date: _____

District I
1625 N. French Dr., Hobbs, NM 88240
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811 S. First St., Artesia, NM 88210
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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 313118

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	313118
Action Type:	
[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)	

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2313129153
Incident Name	NAPP2313129153 HONEY GRAHAM 29 STATE COM 006H @ 0
Incident Type	Release Other
Incident Status	Remediation Plan Received
Incident Facility	[fAPP2203946381] HONEY GRAHAM 29 ST

Location of Release Source	
Please answer all the questions in this group.	
Site Name	HONEY GRAHAM 29 STATE COM 006H
Date Release Discovered	04/18/2023
Surface Owner	State

Incident Details	
Please answer all the questions in this group.	
Incident Type	Release Other
Did this release result in a fire or is the result of a fire	No
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	
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.	
Crude Oil Released (bbls) Details	Cause: Corrosion Tank (Any) Crude Oil Released: 50 BBL Recovered: 0 BBL Lost: 50 BBL.
Produced Water Released (bbls) Details	Cause: Corrosion Tank (Any) Produced Water Released: 130 BBL Recovered: 0 BBL Lost: 130 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 313118

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	313118
Action Type:	
[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)	

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be 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: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
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: Christian LLuLL Title: Project Manager Email: christian.llull@tetrattech.com Date: 02/09/2024
--	--

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QUESTIONS, Page 3

Action 313118

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	313118
Action Type:	
[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)	

QUESTIONS

Site Characterization	
<i>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.</i>	
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 ½ and 1 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Greater than 5 (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Greater than 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	High
A 100-year floodplain	Zero feet, overlying, or within area
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan	
<i>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.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>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.</i>	
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)	2240
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	14940
GRO+DRO (EPA SW-846 Method 8015M)	10690
BTEX (EPA SW-846 Method 8021B or 8260B)	226
Benzene (EPA SW-846 Method 8021B or 8260B)	7.6
<i>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>	
On what estimated date will the remediation commence	07/07/2024
On what date will (or did) the final sampling or liner inspection occur	07/09/2024
On what date will (or was) the remediation complete(d)	07/31/2024
What is the estimated surface area (in square feet) that will be reclaimed	5896
What is the estimated volume (in cubic yards) that will be reclaimed	1681
What is the estimated surface area (in square feet) that will be remediated	5896
What is the estimated volume (in cubic yards) that will be remediated	1681
<i>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.</i>	
<i>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.</i>	

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QUESTIONS, Page 4

Action 313118

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	313118
	Action Type:	[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

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	HALFWAY DISPOSAL AND LANDFILL [fEEM0112334510]
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: Christian LLuLL Title: Project Manager Email: christian.llull@tetrattech.com Date: 02/09/2024
--	--

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 313118

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	313118
Action Type:	
[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)	

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	No

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Santa Fe, NM 87505

QUESTIONS, Page 6
Action 313118

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	313118
Action Type:	
[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)	

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

Incident ID	
District RP	
Facility ID	
Application ID	

Closure

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

Closure Report Attachment Checklist: *Each of the following 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: _____ Title: _____

Signature:  _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____


APPENDIX B

Regulatory Correspondence

Poole, Nicholas

From: Hamlet, Robert, EMNRD <Robert.Hamlet@emnrd.nm.gov>
Sent: Friday, August 25, 2023 8:53 AM
To: Poole, Nicholas
Cc: Bratcher, Michael, EMNRD; Wells, Shelly, EMNRD; Velez, Nelson, EMNRD
Subject: (Extension Approval) - COG - NAPP2313129153 (Honey Graham 29 State Com 006H)

You don't often get email from robert.hamlet@emnrd.nm.gov. [Learn why this is important](#)

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RE: Incident #**NAPP2313129153**

Nicholas,

Your request for an extension to **October 16th, 2023** is approved. Please include this e-mail correspondence in the remediation and/or closure report.

Robert Hamlet • Environmental Specialist - Advanced
Environmental Bureau
EMNRD - Oil Conservation Division
506 W. Texas Ave. | Artesia, NM 88210
575.909.0302 | robert.hamlet@state.nm.us
<http://www.emnrd.state.nm.us/OCD/>



From: Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>
Sent: Thursday, August 24, 2023 3:28 PM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@emnrd.nm.gov>
Cc: Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>
Subject: FW: [EXTERNAL] Extension Request - NAPP2313129153 (Honey Graham 29 State Com 006H)

From: Poole, Nicholas <NICHOLAS.POOLE@tetrattech.com>
Sent: Thursday, August 24, 2023 2:52 PM
To: Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>
Cc: Harimon, Jocelyn, EMNRD <Jocelyn.Harimon@emnrd.nm.gov>
Subject: [EXTERNAL] Extension Request - NAPP2313129153 (Honey Graham 29 State Com 006H)

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

To Whom It May Concern,

On behalf of ConocoPhillips, Tetra Tech is requesting a 90-day extension (until October 16, 2023) to complete assessment activities and associated reporting for the Honey Graham 29 State Com 006H Release site (**NAPP2313129153**). The release occurred on April 18, 2023, and the initial C-141 Report Form was received by NMOCD on May 11, 2023.

The release footprint is located on State Trust lands. As of December 1, 2022 New Mexico State Land Office's Cultural Properties Protection (CPP) Rule is in effect. In tandem with this CPP rule, the NMSLO has begun enforcing application and permitting requirements per Rule 12 (19.2.12 NMAC) for Water/Soil Boring Exploration Permits. Any intrusive activities (i.e. # soil borings to be drilled, sampling to be conducted, etc.) must be permitted through the Water Bureau, Oil, Gas, and Minerals Division, New Mexico State Land Office.

Tetra Tech is currently in the process of complying with these rules. The allocation of resources required to complete the cultural survey requirements and the Water/Soil Boring Exploration permit process are demanding and require additional time for coordination with not only regulatory personnel but additional archaeological subcontractors and cultural specialists. ConocoPhillips plans to conduct the assessment in the coming month, as soon as the cultural survey is completed, the archaeological report is submitted and approved by State Land Office Cultural Resources, and the permitting process is completed.

Please let me know if you have any questions or concerns.

Thank you in advance.

Nicholas

Nicholas Poole | Project Scientist
Mobile +1 (512) 560-9064 | nicholas.poole@tetratech.com

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Poole, Nicholas

From: OCDOnline@state.nm.us
Sent: Tuesday, December 26, 2023 2:42 PM
To: Llull, Christian
Subject: The Oil Conservation Division (OCD) has rejected the application, Application ID: 270760

 **CAUTION:** This email originated from an external sender. Verify the source before opening links or attachments. 

To whom it may concern (c/o Christian Llull for COG OPERATING LLC),

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAPP2313129153, for the following reasons:

- **Remediation plan denied. Request for variance on background chloride concentrations is denied. Both Table 1 and Table 2 show several chloride samples below 100 ppm. Request for a variance to collect confirmation samples at every 400 square feet is approved.**

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 270760. Please review and make the required correction(s) prior to resubmitting.


If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141.

Thank you,
Shelly Wells
Environmental Specialist-A
505-469-7520
Shelly.Wells@emnrd.nm.gov

New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

Poole, Nicholas

From: OCDOnline@state.nm.us
Sent: Friday, February 9, 2024 3:06 PM
To: Llull, Christian
Subject: The Oil Conservation Division (OCD) has approved the application, Application ID: 313118

 **CAUTION:** This email originated from an external sender. Verify the source before opening links or attachments. 

To whom it may concern (c/o Christian Llull for COG OPERATING LLC),

The OCD has approved the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAPP2313129153, with the following conditions:

- **Please submit closure report to OCD by 5/9/2024.**

The signed C-141 can be found in the OCD Online: Imaging under the incident ID (n#).

If you have any questions regarding this application, please contact me.

Thank you,
Shelly Wells
Environmental Specialist-A
505-469-7520
Shelly.Wells@emnrd.nm.gov

New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

From: [Knight, Tami C.](#)
To: [Esparza, Brittany](#)
Cc: [Lull, Christian](#); [Poole, Nicholas](#)
Subject: RE: (Revised Work Plan) Honey Graham 29 State Com 006H (NAPP2313129153) 04-18-2023 - ECO Approved
Date: Monday, March 4, 2024 3:24:30 PM
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.jpg](#)

CAUTION: This email originated from an external sender. Verify the source before opening links or attachments.

The NMSLO Environmental Compliance Office (ECO) has reviewed the subject remediation plan, and based on the information provided in the document received from your office, ECO has approved the remediation plan. Please submit the remediation closure report to eco@slo.state.nm.us.

Environmental Compliance Office

Surface Resources Division

eco@slo.state.nm.us

nmstatelands.org

.....

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From: Esparza, Brittany <Brittany.Esparza@conocophillips.com>
Sent: Tuesday, February 20, 2024 1:33 PM
To: SLO Spills <spills@slo.state.nm.us>
Cc: Esparza, Brittany <Brittany.Esparza@conocophillips.com>
Subject: [EXTERNAL] (Revised Work Plan) Honey Graham 29 State Com 006H (NAPP2313129153) 04-18-2023

To Whom it May Concern,

Please find the attached Revised Work Plan for the COG Honey Graham 29 State Com 006H release that occurred on April 18, 2023. This Revised Work Plan was uploaded to the NMOCD portal today.

Please let me know if you have any questions.

Thank you,

Brittany N. Esparza

Brittany N. Esparza | Environmental Technician, Permian | **ConocoPhillips**

O: 432-221-0398 | C: 432-349-1911 | 1CC-331 Midland, Texas

From: [Wells, Shelly, EMNRD](#)
To: [Poole, Nicholas](#)
Cc: [Bratcher, Michael, EMNRD](#)
Subject: RE: [EXTERNAL] Extension Request - NAPP2313129153 (Honey Graham 29 State Com 006H)
Date: Wednesday, May 8, 2024 9:42:17 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

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Good morning Nicholas,

The 90-day extension request for NAPP2313129153 is approved. New due date is 8/6/2024.

Please include a copy of this email in the closure report.

Kind regards,

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: Poole, Nicholas <NICHOLAS.POOLE@tetrattech.com>
Sent: Wednesday, May 8, 2024 8:00 AM
To: Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>
Cc: Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>
Subject: [EXTERNAL] Extension Request - NAPP2313129153 (Honey Graham 29 State Com 006H)

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

To Whom It May Concern,

On behalf of ConocoPhillips, Tetra Tech is requesting a 90-day extension (until Wednesday August 7, 2024) to complete remedial activities and associated reporting for the Honey Graham 29 State Com 006H Release site (**NAPP2313129153**). The release occurred on April 18, 2023, and the initial C-141

Report Form was received by NMOCD on May 11, 2023. On February 8, 2024, based on the comments provided with the rejected Work Plan, a Revised Work Plan was submitted to exclude a variance. On February 9, 2024, NMOCD approved the remediation plan with the following comments: *Please submit closure report to OCD by 5/9/2024.*

Tetra Tech is currently preparing for remedial action at the project site with a tentative start date of May 20, 2024. Recent safety incidents in the Permian Basin have precipitated additional policies and procedures regarding overhead and subsurface utilities and remedial action to be performed in the vicinity of said utilities. These policies and procedures require additional permitting and planning in order to safely and successfully complete remedial work in heavily congested areas. Worker safety is of paramount importance to ConocoPhillips and a remediation in an area such as this cannot be rushed. Thus additional time is required to ensure the safety of field personnel and to eliminate any possible additional unwanted impacts to the environment resulting from an unplanned incident.

Once the remedial activities are complete, and confirmation sampling data is collected, tabulated, and evaluated, a closure report will be submitted to the OCD.

Please let me know if you have any questions or concerns.

Thank you in advance.

Nicholas

Nicholas Poole | Project Scientist

Mobile +1 (512) 560-9064 | nicholas.poole@tetrattech.com

Tetra Tech | *Leading with Science*® | OGA

8911 N. Capital of Texas Highway | Bldg. 2, Suite 2310 | Austin, TX 78759 | tetrattech.com

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Please consider the environment before printing. [Read more](#)



From: OCDOnline@state.nm.us
To: [Llull, Christian](#)
Subject: The Oil Conservation Division (OCD) has accepted the application, Application ID: 345965
Date: Monday, May 20, 2024 3:10:24 PM

CAUTION: This email originated from an external sender. Verify the source before opening links or attachments.

To whom it may concern (c/o Christian Llull for COG OPERATING LLC),

The OCD has received the submitted *Notification for (Final) Sampling of a Release* (C-141N), for incident ID (n#) nAPP2313129153.

The sampling event is expected to take place:

When: 05/22/2024 @ 15:30

Where: C-29-26S-28E 0 FNL 0 FEL (32.01981,-104.11061)

Additional Information: Contact Nicholas Poole at Mobile +1 (512) 560-9064

Additional Instructions: PER SHELLY WELLS: Hi Nicholas,

OCD Permitting is only working internally this afternoon and it is being worked on to provide access to the public. I have gone into both incidents and approved a variance for these sampling notifications. In order to submit your closure reports you will need to put at least one sampling notification in for each incident and these can be backdated.

Thank you,

Shelly

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, sampling pursuant to 19.15.29.12.D NMAC is required. Sampling must be performed following an approved sampling plan or pursuant to 19.15.29.12.D.(1).(c) NMAC. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

- **Failure to notify the OCD of sampling events including any changes in date/time per the requirements of 19.15.29.12.D.(1).(a) NMAC, may result in the remediation closure samples not being accepted.**

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

APPENDIX C

Cultural Survey



Stephanie Garcia Richard, Commissioner of Public Lands
State of New Mexico

NMSLO Cultural Resources Cover Sheet Exhibit

NMCRIS Activity Number: 154498

Exhibit Type (select one)

☐ ARMS Inspection/Review - Summarize the results (select one):

- ☐ (A) The entire area of potential effect or project area has been previously surveyed to current standards and **no cultural properties** were found within the survey area.
- ☐ (B) The entire area of potential effect or project area has been previously surveyed to current standards and **cultural properties were found** within the survey area.
- ☐ (C) The entire area of potential effect or project area has **not** been previously surveyed or **has not been surveyed** to current standards. A complete archaeological survey will be conducted and submitted for review.

☒ Archaeological Survey

Findings:

☒ **Negative** - No further archaeological review is required.

☐ **Positive** - Have avoidance and protection measures been devised? Select one:

Comments:

Project Details:

NMSLO Lease Number (if available):

Project Proponent (Applicant): Tetra Tech Inc.

Project Title/Description: A Class III Cultural Resources Survey for the proposed Honey Graham 29 St Battery Well Project in Eddy County, NM

Cultural Resources Consultant: SWCA Environmental Consultants

Project Location:

County(ies): Eddy

Section/Township/Range: T26S R28E 29

For NMSLO Agency Use Only:

NMSLO Lease Number:

Lease Analyst:

Date Exhibit Routed to Cultural Resources Office:

No change in wording should occur in this legal document under any circumstances. The completion of this Cover Sheet does not allow for any ground disturbance before official approval of the proposed lease activity, nor does it guarantee that no further steps will be required for the approval of your application or project.

Form Revised 6.2.22

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 4 4 9 8

Registration

Lead Agency: New Mexico State Land Office

Performing Agency: SWCA Environmental Consultants

Activity ID: 82726

Performing Agency Report No: 23-885

Report Recipient (Your Client): Tetra Tech, Inc.

- Activity Types:
- ☐ Research Design
 - ☒ Archaeological Survey/Inventory
 - ☐ Architectural Survey/Inventory
 - ☐ Test Excavation
 - ☐ Monitoring
 - ☐ Collections/Non-Field Study
 - ☐ Compliance Decision
 - ☐ Literature Review Overview
 - ☐ Excavation
 - ☐ Ethnographic Study
 - ☐ Resource/Property Visit
 - ☐ Historic Structures Report
 - ☐ Other:

Total Survey Acreage: 1.94

Total Tribal Acreage: 0.00

Total Resources Visited: 0

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 4 4 9 8

Associate/Register Resources

Prefix	Number	Field Site/Other Number	In GIS	Resource Type	Collections Made?	Revisit
			<input type="checkbox"/>		<input type="checkbox"/>	

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 4 4 9 8

Report Details

Lead Agency

Lead Agency: New Mexico State Land Office

Lead Agency Report No.

Report Number: _____

Title of Report

Title of Report: A Class III Cultural Resources Survey for the proposed Honey Graham 29 St Battery Well Project in Eddy County, NM

Authors: Paisley DeFreese

Type of Report

Publication Type: Report, Monograph, or Book Negative

Description of Undertaking (what does the project entail?)

Description: Tetra Tech, Inc. proposes to remediate the Honey Graham 29 St Battery Well Project in Eddy County, NM. The remediation process will require removing impacted sediments from the contaminated area and replacing them with clean soil. The area effected by the release totals 0.13 acres (0.05 hectares) and is located approximately 23.05 kilometers (14.32 miles) southwest of Malaga, New Mexico on lands managed by the New Mexico State Land Office (NMSLO).

Dates of Investigation

From: 5-Dec-2023 To: 5-Dec-2023

Report Date

Report Date: 20-Dec-2023

Performing Agency/Consultant

Name: SWCA Environmental Consultants

Principal Investigator: Meaghan Trowbridge

Field Supervisor: Jacob Borchardt

Field Personnel Names: Cash Ficke

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 4 4 9 8

Historian/Other: N/A

Report Details

Performing Agency Report Number

Report Number: 23-885

Client/Customer (project proponent)

Name: Tetra Tech, Inc.

Contact: Sam Chama

Address: 1500 City West, #1000, Houston, TX 77042

Phone: (512) 338-1667

Client/Customer Project Number

Project Number: 82726

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 4 4 9 8

Ownership & Location

Land Ownership Status (Must be indicated on Project Map)

Land Ownership:

Land Owner/Manager	Protocol	Acres Surveyed	Acres in APE
NM SLO	Class III	1.94	0.13

Total Survey Acreage: 1.94

Total Tribal Acreage: 0.00

Record Search(es)

Date of HPD/ARMS File Review: 28-Nov-2023

Date of Other Agency File Review: 28-Nov-2023

Survey Data

Source Graphics: NAD 83
✓ USGS 7.5' (1:24,000) topo map ☐ Other Topo Map Scale:
✓ GPS Unit
☐ Aerial Photos ☐ Other Source Graphic(s):

The following tables (b,c,& e) are calculated by the NMCRIS Map Service

USGS 7.5' Topographic Map(s)

Map Name	USGS Quad Code
Red Bluff	32104-A1

County(ies)

County	FIPS
Eddy	

Legal Description

Unplatted	Township (N/S)	Range (E/W)	Section
	T26S	R28E	29

Projected Legal Description

Nearest City or Town: Malaga

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 4 4 9 8

GIS

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NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 4 4 9 8

Methodology

Survey Field Methods

Intensity: 100% coverage

Configuration: ☒ Block Survey Units ☐ Linear Survey Units (l x y)

Other Survey Units

Scope: Non-Selective

Coverage Method: ☒ Systematic Pedestrian Coverage Other Method:

Survey Interval (m): 15 Crew Size: 2

Fieldwork Dates: From: 5-Dec-2023 To: 5-Dec-2023

Survey Person Hours: 1.5 Recording Person Hours: 0

Additional Narrative: SWCA surveyed a 100-foot (30.4-m) buffer around the inadvertent release location on NMSLO-managed land to provide sufficient area for remediation activities.

Environmental Setting (NRCS soil designation; vegetative community; elevation; etc.)

Environmental Setting:

The project area falls within the Chihuahuan Basins and Playas (24a) ecoregion. This ecoregion includes alluvial fans, internally drained basins, and river valleys mostly below 4,500 feet in elevation (Griffith et al. 2006). The elevation of the project area is 913.53 m (2,997.11 feet) above mean sea level (amsl). This ecoregion is composed of desert grasses and shrub land in erosional settings. The project is located within the shrub land setting. Typical vegetation includes creosote bush, tarbush, yuccas, sandsage, viscid acacia, tasajillo, lechuguilla, mesquite, and ceniza. (Griffith et al. 2006). Wildlife in the area includes mule deer, prairie dog, gopher, fox, coyote, skunk, black-tailed jackrabbit, desert cottontail, scaled quail, burrowing owl, mourning dove, wrens, various hawks, bull snake, prairie rattlesnake, plain hognose snake, western hooknose snake and numerous lizards (Biota Information System of New Mexico 2023). Important animal species prehistorically include deer, jackrabbit, and cottontail.

Geology underlying the project area comprises Holocene to middle Pleistocene eolian deposits [(Qe) (U.S. Geological Survey 2023)]. Two soils are present within the project area. Cottonwood-Reeves loams, 0 to 3 percent slopes (0.39 percent survey area) are excessively drained with a very high runoff class. Gypsum land-Cottonwood complex, 0 to 3 percent (0.9 percent of survey area) and are well drained, with a very high runoff class (Natural Resources Conservation Service 2023).

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 4 4 9 8

The climate information was compiled using the Carlsbad Caverns, New Mexico (291480) climate station data (period of record February 1, 1930, to June 6, 2016). Rain is heaviest in September. Snowfall is heaviest between December and February averaging 3.96 cm (1.56 inch). January is the coldest at 0.88 degrees Celsius (33.6 degrees Fahrenheit) and July is warmest at 32.83 degrees Celsius (91.1 degrees Fahrenheit) (Western Regional Climate Center 2023).

Biota Information System of New Mexico
2023 Database Query for Eddy County. Available at: <http://www.bison-m.org/>. Accessed December 2023.

Griffith, G. E., J. M. Omernik, M. M. McGraw, G. Z. Jacobi, C. M. Canavan, T. S. Schrader, D. Mercer, R. Hill, and B. C. Moran
2006 Ecoregions of New Mexico (color poster with map, descriptive text, summary tables, and photographs). Reston, Virginia: U.S. Geological Survey (map scale 1:1,400,000).

Natural Resources Conservation Service
2023 Web Soil Survey. Available at:
<http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>. Accessed November 2023. Accessed December 2023.

Western Regional Climate Center
2023 Carlsbad Caverns, New Mexico (291480). Available at:
<https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?nm1480>. Accessed December 2023.

Methodology

Percent Ground Visibility

Ground Visibility: 76-99%

Condition of Survey Area:

The project area is almost entirely encompassed by two oil pads composed of a combination of graded ground surface and imported sediments. The spill effected area is limited to the easternmost pad and a shallow drainage running between the two platforms. The spill is no longer visible on the ground surface. Only a small area at the southeastern corner of the project area is undeveloped.

Attachments (check all appropriate boxes)

- ☒ USGS 7.5 Topographic Map with sites, isolates, and survey area clearly drawn (required)
- ☒ Copy of NMCRIS Map Check (required)
- ☐ LA Site Forms – new sites (with sketch map & topographic map) if applicable
- ☐ LA Site Forms (update) – previously recorded & un0relocated sites (first 2 pages minimum)
- ☐ List and Description of Isolates, if applicable
- ☐ List and Description of Collections, if applicable

Other Attachments

- ☒ Photographs and Log

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 4 4 9 8

✓ Other attachments Describe: Previous site and survey tables

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 4 4 9 8

Cultural Resource Findings

Investigation Results

Archaeological Sites Discovered and Registered: 0

Archaeological Sites Discovered and NOT Registered: 0

Previously Recorded Archaeological Sites Revisited (site update form required): 0

Previously Recorded Archaeological Sites Not Relocated (site update form required): 0

Total Archaeological Sites (visited & recorded): 0

Total Isolates Recorded: 0

✓ Non-Selective Isolate Recording

HCPI Properties Discovered and Registered: 0

HCPI Properties Discovered And NOT Registered: 0

Previously Recorded HCPI Properties Revisited: 0

Previously Recorded HCPI Properties NOT Relocated: 0

Total HCPI Properties (visited & recorded, including acequias): 0

If No Cultural Resources Found, Discuss Why:

The size of the survey area was small, and the area has been disturbed by previous oil and gas activities.

Management Summary

Summary:

Tetra Tech contracted with SWCA Environmental Consultants (SWCA) to complete an intensive Class III pedestrian survey for the proposed Honey Graham 29 St Battery Well project. SWCA surveyed a total of 1.94 acres (0.79 hectares), which includes a 100-ft (30.4-m) cultural resources buffer around the location on lands managed by the NMSLO in Eddy County, New Mexico. No archaeological sites or historic properties were observed during the current investigation. No additional investigation or treatment is recommended regarding the current undertaking. If subsurface cultural materials are encountered during remediation, all work should cease, and the NMSLO should be notified immediately.

NMSLO cultural resources preservation efforts requires that an archaeological survey be conducted to current standards for the APE pursuant to and in compliance with New Mexico Administrative Code (NMAC) 4.10.15 and 19.2.24 to ensure that cultural properties are not inadvertently excavated, harmed, or destroyed by any person.

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 4 4 9 8

Attachments

Documents:

Attachment Type	Description	Name	File Type	Size	Upload Date	Upload By
Report/Manuscript	NIAF_154498	NIAF_154498	PDF document	3092 KB	10-Oct-2023	Paisley DeFreese

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 4 4 9 8

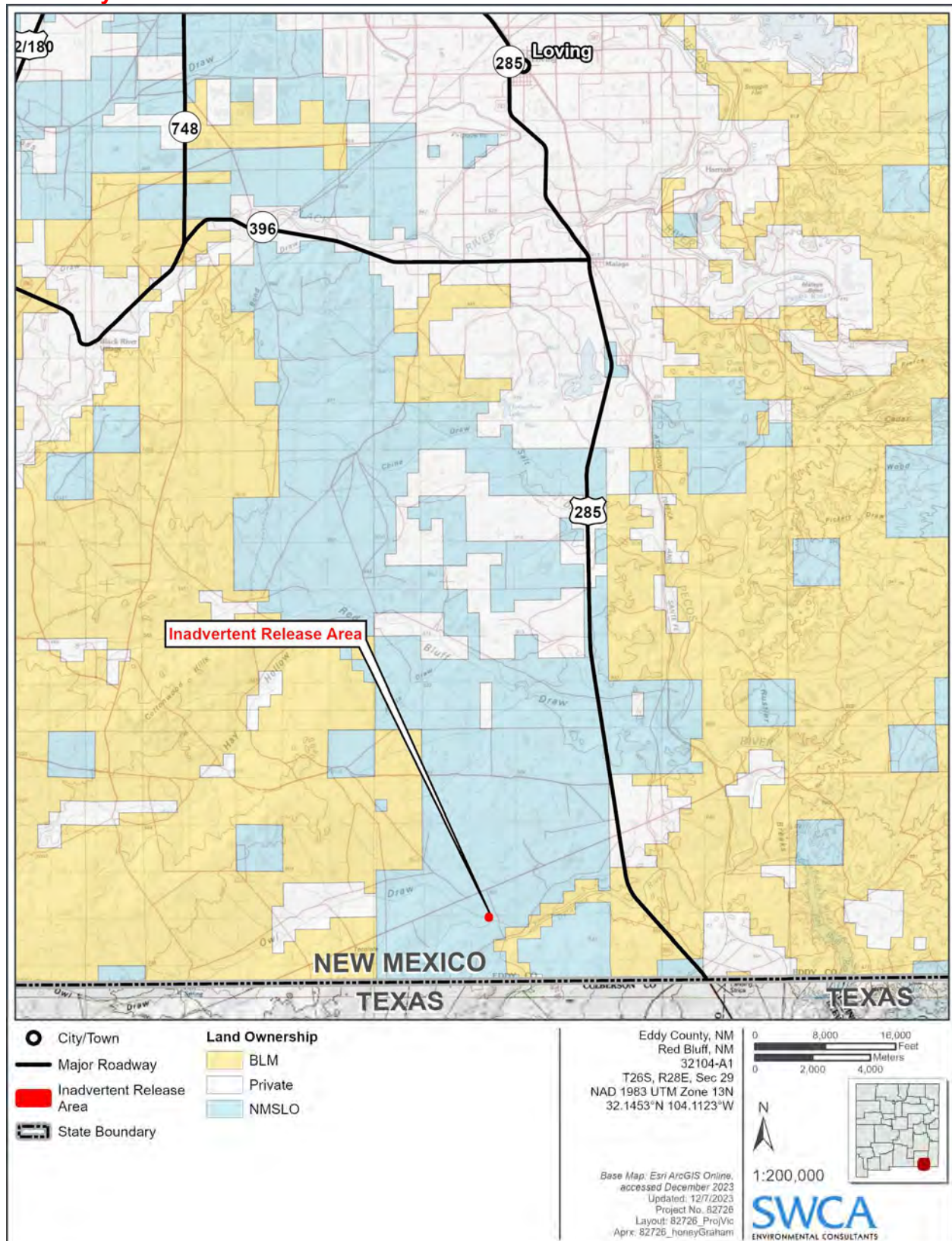


Figure 1. Project vicinity map.

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 4 4 9 8

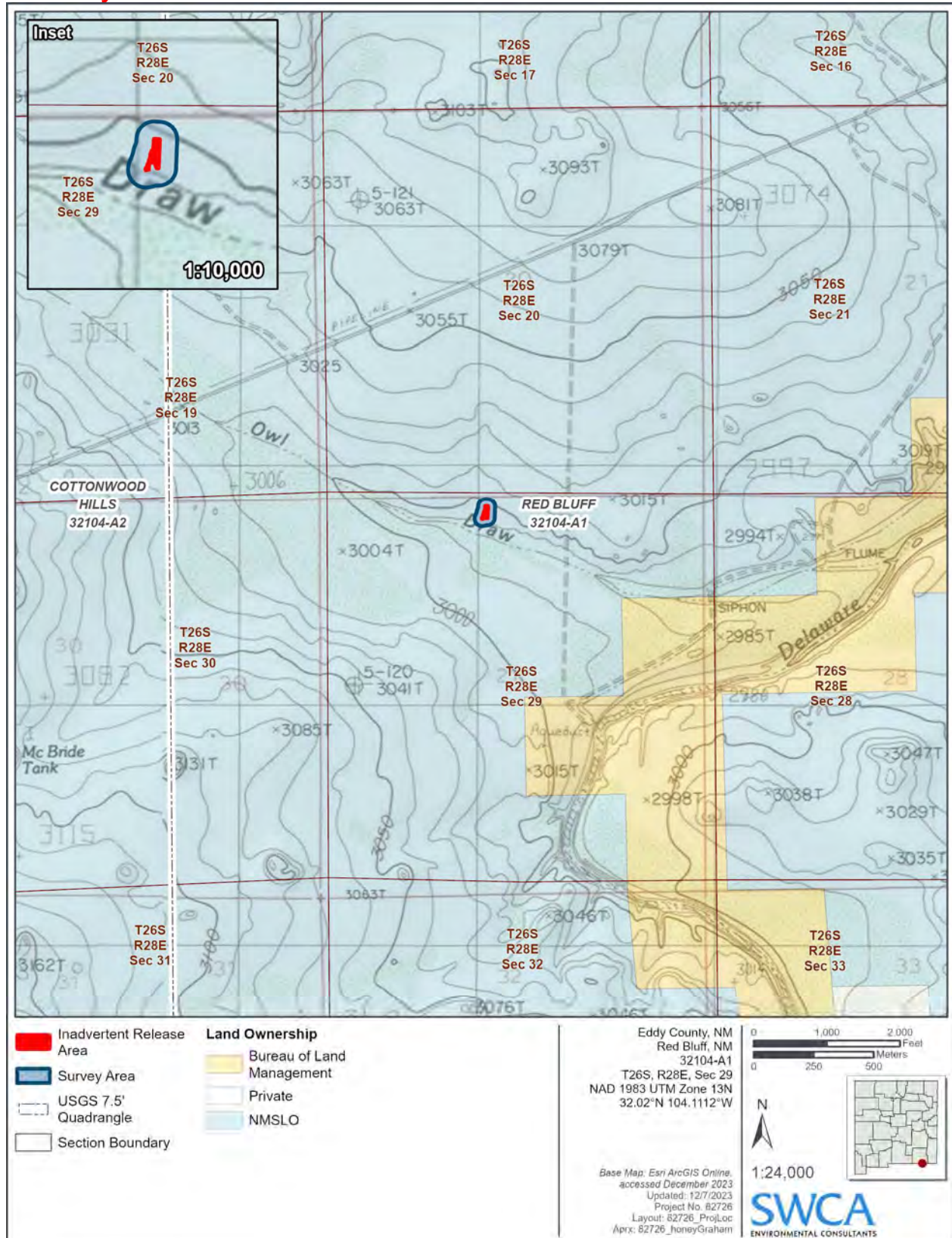


Figure 2. Project location map.

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 4 4 9 8

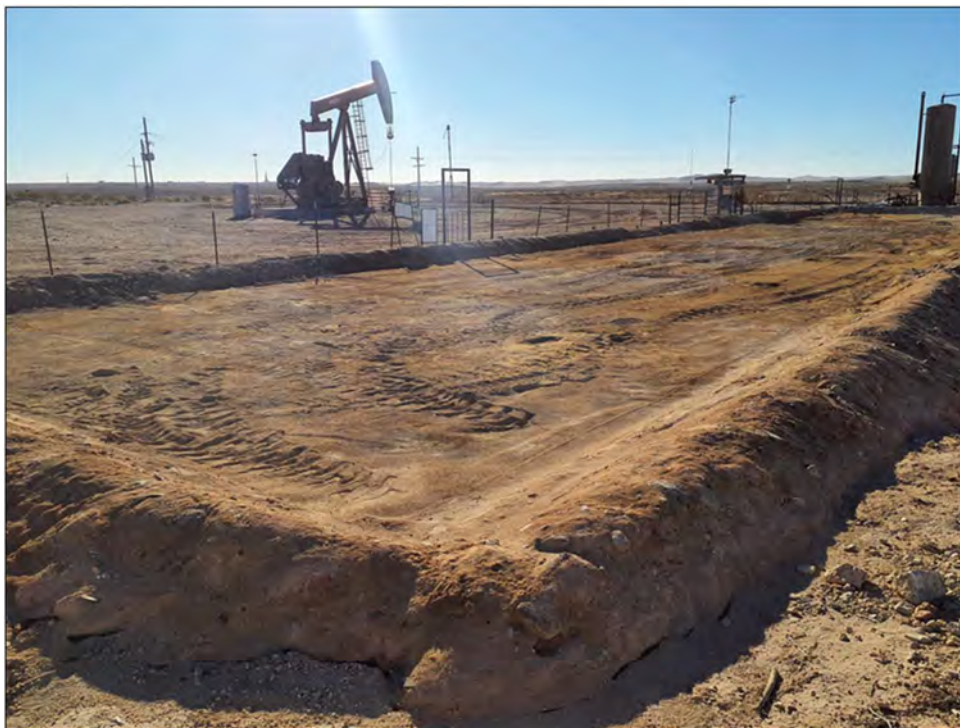


Figure 3. Overview of primary spill area, tanks are removed, facing south (Frame 8256).



Figure 4. Overview of survey area, facing northeast (Frame 4101).

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 4 4 9 8



Figure 5. Overview of survey where the spill entered the drainage, facing north (Frame 3206).

*Redacted

Figure 6. NMCRIS records search showing project area in blue and previous archaeological survey is represented by a gold polygon.

Table 1. Archaeological Surveys Conducted within 500 m (0.31 mile) of the Survey Area

NMCRIS No.	Performing Agency	Activity Start Date	Acres Surveyed	Resources Visited
125470	Lone Mountain Archaeological Services	8-JUL-2012	32,953.33	357
132233	Statistical Research, Inc.	7-JUL-2014	9,528.07	79
133082	APAC	25-MAR-2015	37.11	0
134797	Boone Archaeological Services of New Mexico	23-NOV-2015	5.00	0
138013	Statistical Research, Inc.	4-APR-2017	2,027.10	29
139403	Lone Mountain Archaeological Services	3-NOV-2017	487.19	10
139890	SWCA Environmental Consultants	25-JAN-2018	257.84	2
140164	Advanced Archaeological Solutions	13-APR-2018	431.50	10

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 4 4 9 8

NMCRIS No. Performing Agency		Activity Start Date	Acres Surveyed	Resources Visited
140263	APAC	26-FEB-2018	677.70	9
147257	Goshawk Environmental Consulting	13-JAN-2021	91.24	0
153092	Advanced Archaeological Solutions	1-JUN-2023	1.00	0

Table 2. Previously Recorded Sites within 500 m (0.31 mile) of the Survey Area.

*redacted

APPENDIX D

Site Characterization Data



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced,
O=orphaned,
C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD Number	POD Sub-Code	basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	Depth Well	Depth Water	Water Column
C 04466 POD1	CUB	ED		3	3	2	29	26S	28E	584327	3542357	742	96	33	63

Average Depth to Water: **33 feet**

Minimum Depth: **33 feet**

Maximum Depth: **33 feet**

Record Count: 1

UTM NAD83 Radius Search (in meters):

Easting (X): 583955.25

Northing (Y): 3543000.56

Radius: 800

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

7/28/23 2:08 PM

Page 1 of 1

WATER COLUMN/ AVERAGE
DEPTH TO WATER

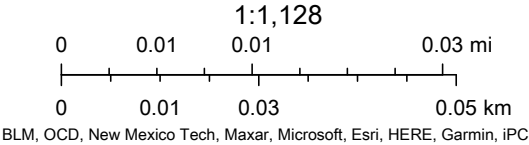
OCD Karst Potential Map



7/28/2023, 3:02:08 PM

Karst Occurrence Potential

High





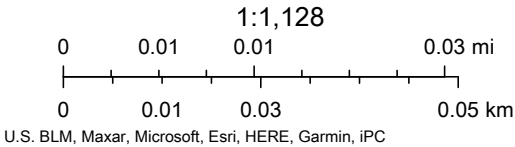
7/28/2023, 3:05:21 PM

Mineral Ownership

N-No minerals are owned by the U.S.

Land Ownership

S

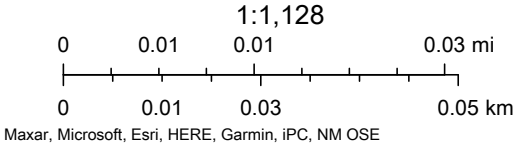


OCD Waterbodies Map



7/28/2023, 3:01:14 PM

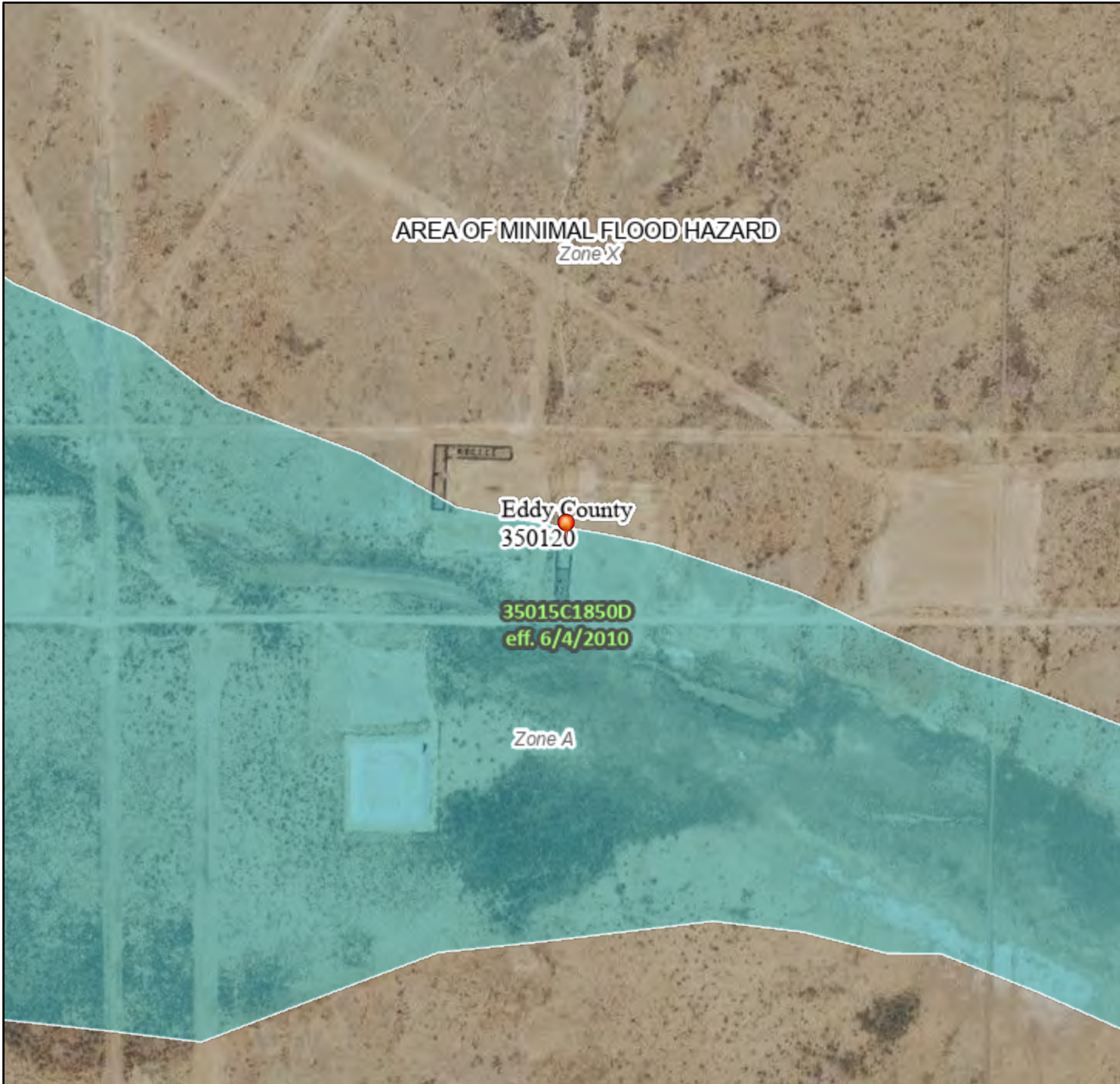
— OSE Streams



National Flood Hazard Layer FIRMette



104°6'58"W 32°1'27"N



0 250 500 1,000 1,500 2,000 Feet

1:6,000

104°6'21"W 32°0'57"N

Released to Imaging: 8/7/2024 11:06:53 AM

Basemap Imagery Source: USGS National Map 2023

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5 Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped



The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 7/31/2023 at 10:43 AM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

APPENDIX E

Photographic Documentation



TETRA TECH, INC. PROJECT NO. 212C-MD-03173	DESCRIPTION	View west. Site signage at eastern containment berm.	1
	SITE NAME	Honey Graham 29 State #006H Release	7/20/2023



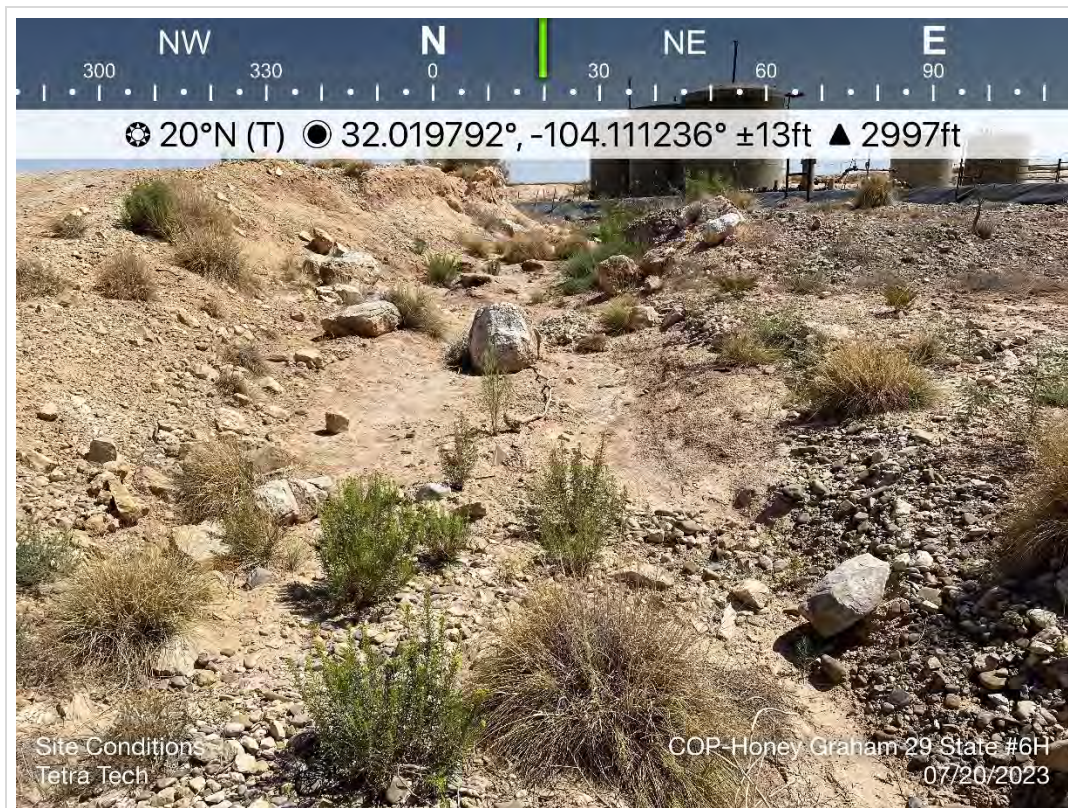
TETRA TECH, INC. PROJECT NO. 212C-MD-03173	DESCRIPTION	View southwest. Northern portion of the release area.	2
	SITE NAME	Honey Graham 29 State #006H Release	7/20/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03173	DESCRIPTION	View north. Western side of tank battery secondary containment.	3
	SITE NAME	Honey Graham 29 State #006H Release	7/20/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03173	DESCRIPTION	View northeast. Southern portion of the tank battery. Former location of removed tank.	4
	SITE NAME	Honey Graham 29 State #006H Release	7/20/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03173	DESCRIPTION	View north-northeast. Release area west of the tank battery.	5
	SITE NAME	Honey Graham 29 State #006H Release	7/20/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03173	DESCRIPTION	View south. View of current site conditions.	6
	SITE NAME	Honey Graham 29 State #006H Release	12/5/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03173	DESCRIPTION	View south. View of current site conditions.	7
	SITE NAME	Honey Graham 29 State #006H Release	12/5/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03173	DESCRIPTION	View north. View of remedial activities.	8
	SITE NAME	Honey Graham 29 State #006H Release	5/29/2024



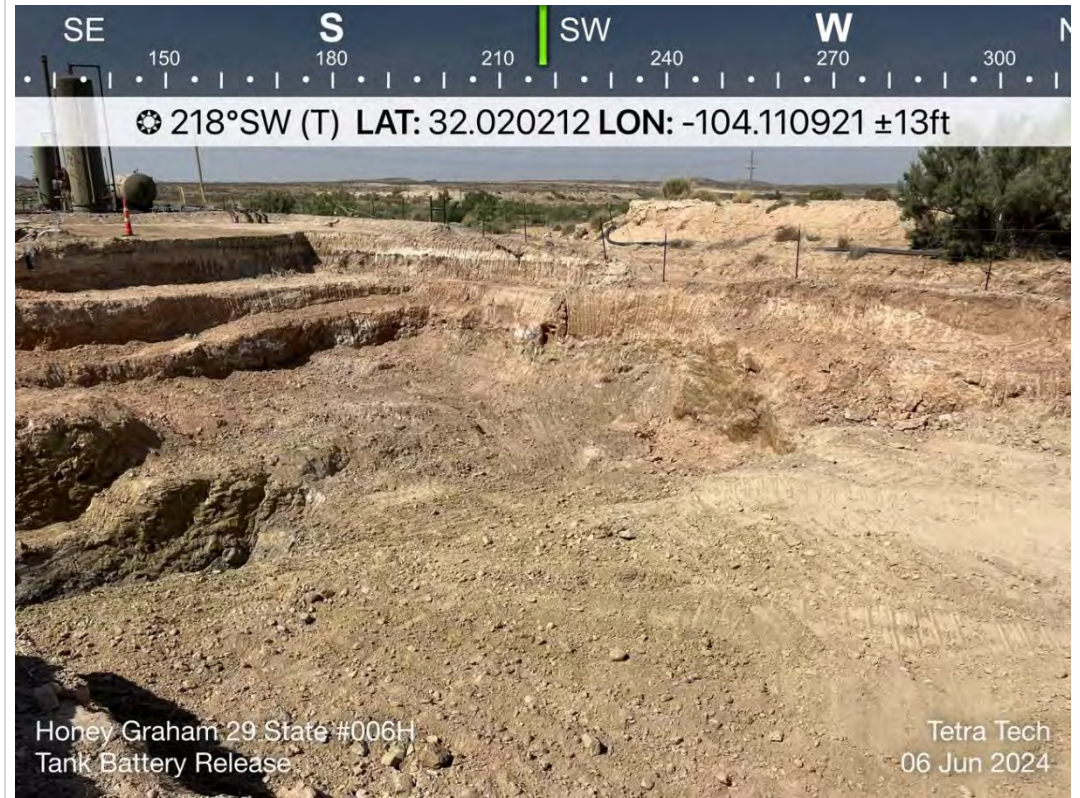
TETRA TECH, INC. PROJECT NO. 212C-MD-03173	DESCRIPTION	View north. View of remedial activities.	9
	SITE NAME	Honey Graham 29 State #006H Release	6/6/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03173	DESCRIPTION	View north-northeast. View of remedial activities. View of approximately 1 foot excavation.	10
	SITE NAME	Honey Graham 29 State #006H Release	6/6/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03173	DESCRIPTION	View northeast. View of remedial activities, view of approximately 8-foot excavation.	11
	SITE NAME	Honey Graham 29 State #006H Release	6/6/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03173	DESCRIPTION	View southwest. View of remedial activities.	12
	SITE NAME	Honey Graham 29 State #006H Release	6/6/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03173	DESCRIPTION	View northwest. View of remedial activities.	13
	SITE NAME	Honey Graham 29 State #006H Release	6/6/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03173	DESCRIPTION	View northwest. View of remedial activities.	14
	SITE NAME	Honey Graham 29 State #006H Release	6/6/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03173	DESCRIPTION	View north. Backfilled former tank battery area.	15
	SITE NAME	Honey Graham 29 State #006H Release	6/14/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03173	DESCRIPTION	View south. Backfilled former tank battery area.	16
	SITE NAME	Honey Graham 29 State #006H Release	6/14/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03173	DESCRIPTION	View northeast. Backfilled former tank battery area.	17
	SITE NAME	Honey Graham 29 State #006H Release	6/14/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03173	DESCRIPTION	View southwest. Backfilled pasture area, west of former tank battery.	18
	SITE NAME	Honey Graham 29 State #006H Release	6/14/2024

APPENDIX F

Analytical Laboratory Data (Remediation and Backfill)



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

May 28, 2024

NICHOLAS POOLE

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: HONEY GRAHAM 29 STATE 6H TANK BATTERY RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 05/24/24 8:13.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-23-16. 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 accredited 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,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/24/2024	Sampling Date:	05/24/2024
Reported:	05/28/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE 6H TANK BA	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03173	Sample Received By:	Alyssa Parras
Project Location:	COP - EDDY CO NM		

Sample ID: ESW - 3 (H242899-01)

BTX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/25/2024	ND	1.90	94.8	2.00	11.8		
Toluene*	<0.050	0.050	05/25/2024	ND	1.94	97.2	2.00	11.2		
Ethylbenzene*	<0.050	0.050	05/25/2024	ND	1.93	96.5	2.00	10.9		
Total Xylenes*	<0.150	0.150	05/25/2024	ND	6.06	101	6.00	10.4		
Total BTX	<0.300	0.300	05/25/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 102 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CT						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	1340	16.0	05/24/2024	ND	448	112	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/25/2024	ND	197	98.5	200	3.89	
DRO >C10-C28*	<10.0	10.0	05/25/2024	ND	193	96.5	200	5.50	
EXT DRO >C28-C36	<10.0	10.0	05/25/2024	ND					

Surrogate: 1-Chlorooctane 77.6 % 48.2-134

Surrogate: 1-Chlorooctadecane 92.3 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/24/2024	Sampling Date:	05/24/2024
Reported:	05/28/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE 6H TANK BA	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03173	Sample Received By:	Alyssa Parras
Project Location:	COP - EDDY CO NM		

Sample ID: FS - 7 (H242899-02)

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/25/2024	ND	1.90	94.8	2.00	11.8		
Toluene*	<0.050	0.050	05/25/2024	ND	1.94	97.2	2.00	11.2		
Ethylbenzene*	<0.050	0.050	05/25/2024	ND	1.93	96.5	2.00	10.9		
Total Xylenes*	<0.150	0.150	05/25/2024	ND	6.06	101	6.00	10.4		
Total BTEx	<0.300	0.300	05/25/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 101 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: CT						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	1260	16.0	05/24/2024	ND	448	112	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/25/2024	ND	197	98.5	200	3.89	
DRO >C10-C28*	<10.0	10.0	05/25/2024	ND	193	96.5	200	5.50	
EXT DRO >C28-C36	<10.0	10.0	05/25/2024	ND					

Surrogate: 1-Chlorooctane 82.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 95.3 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/24/2024	Sampling Date:	05/24/2024
Reported:	05/28/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE 6H TANK BA	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03173	Sample Received By:	Alyssa Parras
Project Location:	COP - EDDY CO NM		

Sample ID: SSW - 1 (H242899-03)

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/25/2024	ND	1.90	94.8	2.00	11.8		
Toluene*	<0.050	0.050	05/25/2024	ND	1.94	97.2	2.00	11.2		
Ethylbenzene*	<0.050	0.050	05/25/2024	ND	1.93	96.5	2.00	10.9		
Total Xylenes*	<0.150	0.150	05/25/2024	ND	6.06	101	6.00	10.4		
Total BTEx	<0.300	0.300	05/25/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 102 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: CT						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	1120	16.0	05/24/2024	ND	448	112	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/25/2024	ND	197	98.5	200	3.89	
DRO >C10-C28*	<10.0	10.0	05/25/2024	ND	193	96.5	200	5.50	
EXT DRO >C28-C36	<10.0	10.0	05/25/2024	ND					

Surrogate: 1-Chlorooctane 90.4 % 48.2-134

Surrogate: 1-Chlorooctadecane 106 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/24/2024	Sampling Date:	05/24/2024
Reported:	05/28/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE 6H TANK BA	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03173	Sample Received By:	Alyssa Parras
Project Location:	COP - EDDY CO NM		

Sample ID: WSW - 2 (H242899-04)

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/25/2024	ND	1.90	94.8	2.00	11.8		
Toluene*	<0.050	0.050	05/25/2024	ND	1.94	97.2	2.00	11.2		
Ethylbenzene*	<0.050	0.050	05/25/2024	ND	1.93	96.5	2.00	10.9		
Total Xylenes*	<0.150	0.150	05/25/2024	ND	6.06	101	6.00	10.4		
Total BTEx	<0.300	0.300	05/25/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 102 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: CT						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	1380	16.0	05/24/2024	ND	448	112	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/25/2024	ND	197	98.5	200	3.89	
DRO >C10-C28*	<10.0	10.0	05/25/2024	ND	193	96.5	200	5.50	
EXT DRO >C28-C36	<10.0	10.0	05/25/2024	ND					

Surrogate: 1-Chlorooctane 86.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 100 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager




PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Notes and Definitions

- BS-3 Blank spike recovery outside of lab established statistical limits, but still within method limits. Data is not adversely affected.
- 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

Cardinal Laboratories *=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Conoco Phillips		P.O. #:		BILL TO		ANALYSIS REQUEST											
Project Manager: Nicholas Poole		Company: TetraTech															
Address:		Attn: Nicholas Poole															
City:		Address:															
State:		City:															
Zip:		State:															
Phone #:		Phone #:															
Fax #:		Fax #:															
Project #: 212C-MD-03173		Project Owner:															
Project Name: Honey Graham 29 State 6H																	
Project Location: Eddy Co, NM																	
Sampler Name: Andrew Garcia																	
FOR LAB USE ONLY																	
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.		MATRIX		PRESERV		SAMPLING									
		# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME	BTEX	TPH	Chlorides	
11242899	ESW-3	4			X				X			5/24/24		X			
	FS-7	1												X			
	SSW-1	1												X			
	MSW-2	1												X			
PLEASE NOTE: Liability and Damages: Cardinal's liability and client's remedies for any claim arising out of or from this contract or tort, shall be limited to the amount paid by the client for the analysis. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable analysis. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors, arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based on contract or tort.		Relinquished By: Andrew Garcia		Date: 5/24/24		Received By: Andrew Garcia		Time: 8:13		Received By: Andrew Garcia		Time:		Remarks: Nicholas Poole @ tetratech.com Andrew Garcia @ tetratech.com		Verbal Result: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Add'l Phone #:	
Relinquished By:		Date:		Received By:		Time:		Received By:		Time:		Remarks:		Verbal Result:		Add'l Phone #:	
Delivered By: (Circle One)		Observed Temp. °C		Sample Condition		CHECKED BY:		Turnaround Time:		Standard		Bacteria (only) Sample Condition		Thermometer ID #140		Corrected Temp. °C	
Sampler - UPS - Bus - Other:		Corrected Temp. °C		Cool Intact		(Initials)		Standard		Rush		Cool Intact		Thermometer ID #140		Corrected Temp. °C	
				<input type="checkbox"/> Yes <input type="checkbox"/> No								<input type="checkbox"/> Yes <input type="checkbox"/> No					



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

May 29, 2024

CHRISTIAN LLULL

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: HONEY GRAHAM 29 STATE 6H TANK BATTERY RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 05/28/24 16:55.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-23-16. 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 accredited 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,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/28/2024	Sampling Date:	05/28/2024
Reported:	05/29/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE 6H TANK BA	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03173	Sample Received By:	Alyssa Parras
Project Location:	COP - EDDY CO NM		

Sample ID: FS - 2 (H242955-01)

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/29/2024	ND	1.94	96.9	2.00	5.24	
Toluene*	<0.050	0.050	05/29/2024	ND	1.89	94.7	2.00	4.30	
Ethylbenzene*	0.082	0.050	05/29/2024	ND	1.93	96.3	2.00	3.67	
Total Xylenes*	0.476	0.150	05/29/2024	ND	5.57	92.9	6.00	3.28	
Total BTEX	0.558	0.300	05/29/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 114 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CT					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	544	16.0	05/29/2024	ND	432	108	400	3.64	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	14.0	10.0	05/29/2024	ND	222	111	200	1.36	
DRO >C10-C28*	263	10.0	05/29/2024	ND	211	106	200	4.00	
EXT DRO >C28-C36	26.8	10.0	05/29/2024	ND					

Surrogate: 1-Chlorooctane 82.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 86.7 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/28/2024	Sampling Date:	05/28/2024
Reported:	05/29/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE 6H TANK BA	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03173	Sample Received By:	Alyssa Parras
Project Location:	COP - EDDY CO NM		

Sample ID: FS - 3 (H242955-02)

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	3.40	2.00	05/29/2024	ND	1.94	96.9	2.00	5.24		
Toluene*	33.6	2.00	05/29/2024	ND	1.89	94.7	2.00	4.30		
Ethylbenzene*	16.1	2.00	05/29/2024	ND	1.93	96.3	2.00	3.67		
Total Xylenes*	81.1	6.00	05/29/2024	ND	5.57	92.9	6.00	3.28		
Total BTEX	134	12.0	05/29/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 108 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CT						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	464	16.0	05/29/2024	ND	432	108	400	3.64		

TPH 8015M		mg/kg		Analyzed By: MS				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	3020	10.0	05/29/2024	ND	222	111	200	1.36	
DRO >C10-C28*	3880	10.0	05/29/2024	ND	211	106	200	4.00	
EXT DRO >C28-C36	409	10.0	05/29/2024	ND					

Surrogate: 1-Chlorooctane 175 % 48.2-134

Surrogate: 1-Chlorooctadecane 133 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/28/2024	Sampling Date:	05/28/2024
Reported:	05/29/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE 6H TANK BA	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03173	Sample Received By:	Alyssa Parras
Project Location:	COP - EDDY CO NM		

Sample ID: FS - 5 (H242955-03)

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/29/2024	ND	1.94	96.9	2.00	5.24		
Toluene*	<0.050	0.050	05/29/2024	ND	1.89	94.7	2.00	4.30		
Ethylbenzene*	<0.050	0.050	05/29/2024	ND	1.93	96.3	2.00	3.67		
Total Xylenes*	<0.150	0.150	05/29/2024	ND	5.57	92.9	6.00	3.28		
Total BTEX	<0.300	0.300	05/29/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 91.9 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CT						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	656	16.0	05/29/2024	ND	432	108	400	3.64		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/29/2024	ND	222	111	200	1.36	
DRO >C10-C28*	<10.0	10.0	05/29/2024	ND	211	106	200	4.00	
EXT DRO >C28-C36	<10.0	10.0	05/29/2024	ND					

Surrogate: 1-Chlorooctane 95.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 91.2 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/28/2024	Sampling Date:	05/28/2024
Reported:	05/29/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE 6H TANK BA	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03173	Sample Received By:	Alyssa Parras
Project Location:	COP - EDDY CO NM		

Sample ID: FS - 6 (H242955-04)

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/29/2024	ND	1.94	96.9	2.00	5.24		
Toluene*	<0.050	0.050	05/29/2024	ND	1.89	94.7	2.00	4.30		
Ethylbenzene*	<0.050	0.050	05/29/2024	ND	1.93	96.3	2.00	3.67		
Total Xylenes*	<0.150	0.150	05/29/2024	ND	5.57	92.9	6.00	3.28		
Total BTEx	<0.300	0.300	05/29/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 88.2 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: CT						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	05/29/2024	ND	432	108	400	3.64		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/29/2024	ND	222	111	200	1.36	
DRO >C10-C28*	<10.0	10.0	05/29/2024	ND	211	106	200	4.00	
EXT DRO >C28-C36	<10.0	10.0	05/29/2024	ND					

Surrogate: 1-Chlorooctane 107 % 48.2-134

Surrogate: 1-Chlorooctadecane 108 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/28/2024	Sampling Date:	05/28/2024
Reported:	05/29/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE 6H TANK BA	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03173	Sample Received By:	Alyssa Parras
Project Location:	COP - EDDY CO NM		

Sample ID: NSW - 1 (H242955-05)

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/29/2024	ND	1.94	96.9	2.00	5.24		
Toluene*	<0.050	0.050	05/29/2024	ND	1.89	94.7	2.00	4.30		
Ethylbenzene*	<0.050	0.050	05/29/2024	ND	1.93	96.3	2.00	3.67		
Total Xylenes*	<0.150	0.150	05/29/2024	ND	5.57	92.9	6.00	3.28		
Total BTEX	<0.300	0.300	05/29/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 93.2 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CT						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	544	16.0	05/29/2024	ND	432	108	400	3.64		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/29/2024	ND	222	111	200	1.36	
DRO >C10-C28*	<10.0	10.0	05/29/2024	ND	211	106	200	4.00	
EXT DRO >C28-C36	<10.0	10.0	05/29/2024	ND					

Surrogate: 1-Chlorooctane 95.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 90.9 % 49.1-148

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Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/28/2024	Sampling Date:	05/28/2024
Reported:	05/29/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE 6H TANK BA	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03173	Sample Received By:	Alyssa Parras
Project Location:	COP - EDDY CO NM		

Sample ID: ESW - 1 (H242955-06)

BTEX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/29/2024	ND	1.94	96.9	2.00	5.24		
Toluene*	<0.050	0.050	05/29/2024	ND	1.89	94.7	2.00	4.30		
Ethylbenzene*	<0.050	0.050	05/29/2024	ND	1.93	96.3	2.00	3.67		
Total Xylenes*	<0.150	0.150	05/29/2024	ND	5.57	92.9	6.00	3.28		
Total BTEX	<0.300	0.300	05/29/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 92.4 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CT						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	368	16.0	05/29/2024	ND	432	108	400	3.64		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/29/2024	ND	222	111	200	1.36	
DRO >C10-C28*	<10.0	10.0	05/29/2024	ND	211	106	200	4.00	
EXT DRO >C28-C36	<10.0	10.0	05/29/2024	ND					

Surrogate: 1-Chlorooctane 89.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 85.0 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/28/2024	Sampling Date:	05/28/2024
Reported:	05/29/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE 6H TANK BA	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03173	Sample Received By:	Alyssa Parras
Project Location:	COP - EDDY CO NM		

Sample ID: SSW - 2 (H242955-07)

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/29/2024	ND	1.94	96.9	2.00	5.24		
Toluene*	<0.050	0.050	05/29/2024	ND	1.89	94.7	2.00	4.30		
Ethylbenzene*	<0.050	0.050	05/29/2024	ND	1.93	96.3	2.00	3.67		
Total Xylenes*	<0.150	0.150	05/29/2024	ND	5.57	92.9	6.00	3.28		
Total BTEX	<0.300	0.300	05/29/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 89.9 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CT						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	144	16.0	05/29/2024	ND	432	108	400	3.64		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/29/2024	ND	222	111	200	1.36	
DRO >C10-C28*	<10.0	10.0	05/29/2024	ND	211	106	200	4.00	
EXT DRO >C28-C36	<10.0	10.0	05/29/2024	ND					

Surrogate: 1-Chlorooctane 101 % 48.2-134

Surrogate: 1-Chlorooctadecane 94.6 % 49.1-148

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Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/28/2024	Sampling Date:	05/28/2024
Reported:	05/29/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE 6H TANK BA	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03173	Sample Received By:	Alyssa Parras
Project Location:	COP - EDDY CO NM		

Sample ID: WSW - 1 (H242955-08)

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/29/2024	ND	1.94	96.9	2.00	5.24		
Toluene*	<0.050	0.050	05/29/2024	ND	1.89	94.7	2.00	4.30		
Ethylbenzene*	<0.050	0.050	05/29/2024	ND	1.93	96.3	2.00	3.67		
Total Xylenes*	<0.150	0.150	05/29/2024	ND	5.57	92.9	6.00	3.28		
Total BTEX	<0.300	0.300	05/29/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 91.4 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CT						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	880	16.0	05/29/2024	ND	432	108	400	3.64		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/29/2024	ND	222	111	200	1.36	
DRO >C10-C28*	<10.0	10.0	05/29/2024	ND	211	106	200	4.00	
EXT DRO >C28-C36	<10.0	10.0	05/29/2024	ND					

Surrogate: 1-Chlorooctane 97.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 87.8 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/28/2024	Sampling Date:	05/28/2024
Reported:	05/29/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE 6H TANK BA	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03173	Sample Received By:	Alyssa Parras
Project Location:	COP - EDDY CO NM		

Sample ID: WSW - 3 (H242955-09)

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/29/2024	ND	1.94	96.9	2.00	5.24		
Toluene*	<0.050	0.050	05/29/2024	ND	1.89	94.7	2.00	4.30		
Ethylbenzene*	<0.050	0.050	05/29/2024	ND	1.93	96.3	2.00	3.67		
Total Xylenes*	<0.150	0.150	05/29/2024	ND	5.57	92.9	6.00	3.28		
Total BTEx	<0.300	0.300	05/29/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 89.7 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: CT						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	160	16.0	05/29/2024	ND	432	108	400	3.64		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/29/2024	ND	222	111	200	1.36	
DRO >C10-C28*	32.8	10.0	05/29/2024	ND	211	106	200	4.00	
EXT DRO >C28-C36	<10.0	10.0	05/29/2024	ND					

Surrogate: 1-Chlorooctane 98.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 95.0 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager

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Notes and Definitions

S-04	The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
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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A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager



101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Conoco Phillips

Project Manager:

Address:

City: State: Zip:

Phone #: Fax #:

Project #: 212C-MD-03173 **Project Owner:**

Project Name: Honey Graham 29 State #006H

Project Location: Eddy Co, NM

Sampler Name: Andrew Garcia

P.O. #:

Company: Tetra Tech

Attn: Nicholas Poole

Address:

City: State: Zip:

Phone #: Fax #:

Lab I.D. 11242965

Sample I.D.

FOR LAB USE ONLY	(G)RAB OR (C)OMP	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME	ANALYSIS REQUEST
ES-2												5/28		BTX
ES-3														TPH
ES-5														Chloride
ES-6														
NSW-1														
ESW-1														
SSW-2														
MSW-1														
MSW-3														

Relinquished By: Andrew Garcia

Date: 5/28/24

Received By: [Signature]

Date: 5/28/24

Time: 16:55

Observed Temp. °C: 3.0

Corrected Temp. °C:

Sample Condition: Cool Intact

Checked By: [Signature]

Turnaround Time: Standard ☒ Rush ☐

Thermometer ID #140: 24 HR TAT

Bacteria (only) Sample Condition: Cool Intact ☐ Yes ☐ No ☐ Observed Temp. °C: Corrected Temp. °C:

REMARKS: Nicholas Poole @ tetratech.com

Andrew Garcia @ tetratech.com



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

June 03, 2024

NICHOLAS POOLE

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: HONEY GRAHAM 29 STATE #006 H

Enclosed are the results of analyses for samples received by the laboratory on 05/31/24 14:13.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-23-16. 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 accredited 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,

A handwritten signature in black ink that reads "Mike Snyder". The signature is fluid and cursive, with the first name "Mike" and last name "Snyder" clearly distinguishable.

Mike Snyder For Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/31/2024	Sampling Date:	05/31/2024
Reported:	06/03/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE #006 H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Shalyn Rodriguez
Project Location:	EDDY CO NM		

Sample ID: ESW - 2 (H243055-01)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	06/02/2024	ND	1.97	98.7	2.00	8.18		
Toluene*	<0.050	0.050	06/02/2024	ND	2.08	104	2.00	7.57		
Ethylbenzene*	<0.050	0.050	06/02/2024	ND	2.05	102	2.00	6.31		
Total Xylenes*	<0.150	0.150	06/02/2024	ND	6.35	106	6.00	6.13		
Total BTEX	<0.300	0.300	06/02/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	480	16.0	06/03/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/31/2024	ND	188	93.9	200	3.85	
DRO >C10-C28*	23.3	10.0	05/31/2024	ND	177	88.3	200	4.84	
EXT DRO >C28-C36	<10.0	10.0	05/31/2024	ND					

Surrogate: 1-Chlorooctane 77.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 79.1 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/31/2024	Sampling Date:	05/31/2024
Reported:	06/03/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE #006 H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Shalyn Rodriguez
Project Location:	EDDY CO NM		

Sample ID: ESW - 3 (4') (H243055-02)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	06/02/2024	ND	1.97	98.7	2.00	8.18		
Toluene*	<0.050	0.050	06/02/2024	ND	2.08	104	2.00	7.57		
Ethylbenzene*	<0.050	0.050	06/02/2024	ND	2.05	102	2.00	6.31		
Total Xylenes*	<0.150	0.150	06/02/2024	ND	6.35	106	6.00	6.13		
Total BTEX	<0.300	0.300	06/02/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 106 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	608	16.0	06/03/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/31/2024	ND	188	93.9	200	3.85	
DRO >C10-C28*	10.5	10.0	05/31/2024	ND	177	88.3	200	4.84	
EXT DRO >C28-C36	<10.0	10.0	05/31/2024	ND					

Surrogate: 1-Chlorooctane 78.4 % 48.2-134

Surrogate: 1-Chlorooctadecane 77.0 % 49.1-148

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/31/2024	Sampling Date:	05/31/2024
Reported:	06/03/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE #006 H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Shalyn Rodriguez
Project Location:	EDDY CO NM		

Sample ID: WSW - 1 (6') (H243055-03)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	06/02/2024	ND	1.97	98.7	2.00	8.18		
Toluene*	<0.050	0.050	06/02/2024	ND	2.08	104	2.00	7.57		
Ethylbenzene*	<0.050	0.050	06/02/2024	ND	2.05	102	2.00	6.31		
Total Xylenes*	<0.150	0.150	06/02/2024	ND	6.35	106	6.00	6.13		
Total BTEX	<0.300	0.300	06/02/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 107 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	80.0	16.0	06/03/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/31/2024	ND	188	93.9	200	3.85	
DRO >C10-C28*	<10.0	10.0	05/31/2024	ND	177	88.3	200	4.84	
EXT DRO >C28-C36	<10.0	10.0	05/31/2024	ND					

Surrogate: 1-Chlorooctane 80.6 % 48.2-134

Surrogate: 1-Chlorooctadecane 78.7 % 49.1-148

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/31/2024	Sampling Date:	05/31/2024
Reported:	06/03/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE #006 H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Shalyn Rodriguez
Project Location:	EDDY CO NM		

Sample ID: WSW - 2 (4') (H243055-04)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	06/02/2024	ND	1.97	98.7	2.00	8.18		
Toluene*	<0.050	0.050	06/02/2024	ND	2.08	104	2.00	7.57		
Ethylbenzene*	<0.050	0.050	06/02/2024	ND	2.05	102	2.00	6.31		
Total Xylenes*	<0.150	0.150	06/02/2024	ND	6.35	106	6.00	6.13		
Total BTEX	<0.300	0.300	06/02/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 104 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	112	16.0	06/03/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/31/2024	ND	188	93.9	200	3.85	
DRO >C10-C28*	<10.0	10.0	05/31/2024	ND	177	88.3	200	4.84	
EXT DRO >C28-C36	<10.0	10.0	05/31/2024	ND					

Surrogate: 1-Chlorooctane 81.1 % 48.2-134

Surrogate: 1-Chlorooctadecane 79.3 % 49.1-148

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*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/31/2024	Sampling Date:	05/31/2024
Reported:	06/03/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE #006 H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Shalyn Rodriguez
Project Location:	EDDY CO NM		

Sample ID: SSW - 1 (4') (H243055-05)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/02/2024	ND	1.97	98.7	2.00	8.18	
Toluene*	<0.050	0.050	06/02/2024	ND	2.08	104	2.00	7.57	
Ethylbenzene*	<0.050	0.050	06/02/2024	ND	2.05	102	2.00	6.31	
Total Xylenes*	<0.150	0.150	06/02/2024	ND	6.35	106	6.00	6.13	
Total BTEX	<0.300	0.300	06/02/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 106 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	272	16.0	06/03/2024	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/31/2024	ND	188	93.9	200	3.85	
DRO >C10-C28*	<10.0	10.0	05/31/2024	ND	177	88.3	200	4.84	
EXT DRO >C28-C36	<10.0	10.0	05/31/2024	ND					

Surrogate: 1-Chlorooctane 87.4 % 48.2-134

Surrogate: 1-Chlorooctadecane 86.9 % 49.1-148

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/31/2024	Sampling Date:	05/31/2024
Reported:	06/03/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE #006 H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Shalyn Rodriguez
Project Location:	EDDY CO NM		

Sample ID: FS - 7 (1') (H243055-06)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	06/02/2024	ND	1.97	98.7	2.00	8.18		
Toluene*	<0.050	0.050	06/02/2024	ND	2.08	104	2.00	7.57		
Ethylbenzene*	<0.050	0.050	06/02/2024	ND	2.05	102	2.00	6.31		
Total Xylenes*	<0.150	0.150	06/02/2024	ND	6.35	106	6.00	6.13		
Total BTEX	<0.300	0.300	06/02/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	336	16.0	06/03/2024	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/31/2024	ND	188	93.9	200	3.85	
DRO >C10-C28*	<10.0	10.0	05/31/2024	ND	177	88.3	200	4.84	
EXT DRO >C28-C36	<10.0	10.0	05/31/2024	ND					

Surrogate: 1-Chlorooctane 77.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 76.9 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

- QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
- 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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A handwritten signature in black ink, appearing to read "Mike Snyder".

Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



Page 9 of 9

† Cardinal cannot accept verbal communication. Please email changes to celey.keene@cardinallabsnm.com



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

June 03, 2024

NICHOLAS POOLE

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: HONEY GRAHAM 29 STATE #006 H

Enclosed are the results of analyses for samples received by the laboratory on 05/31/24 14:13.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-23-16. 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 accredited 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,

A handwritten signature in black ink that reads "Mike Snyder". The signature is fluid and cursive, with the first name "Mike" and last name "Snyder" clearly distinguishable.

Mike Snyder For Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/31/2024	Sampling Date:	05/31/2024
Reported:	06/03/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE #006 H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Shalyn Rodriguez
Project Location:	EDDY CO NM		

Sample ID: ESW - 2 (H243055-01)

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/02/2024	ND	1.97	98.7	2.00	8.18	
Toluene*	<0.050	0.050	06/02/2024	ND	2.08	104	2.00	7.57	
Ethylbenzene*	<0.050	0.050	06/02/2024	ND	2.05	102	2.00	6.31	
Total Xylenes*	<0.150	0.150	06/02/2024	ND	6.35	106	6.00	6.13	
Total BTX	<0.300	0.300	06/02/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	480	16.0	06/03/2024	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/31/2024	ND	188	93.9	200	3.85	
DRO >C10-C28*	23.3	10.0	05/31/2024	ND	177	88.3	200	4.84	
EXT DRO >C28-C36	<10.0	10.0	05/31/2024	ND					

Surrogate: 1-Chlorooctane 77.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 79.1 % 49.1-148

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/31/2024	Sampling Date:	05/31/2024
Reported:	06/03/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE #006 H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Shalyn Rodriguez
Project Location:	EDDY CO NM		

Sample ID: ESW - 3 (4') (H243055-02)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	06/02/2024	ND	1.97	98.7	2.00	8.18		
Toluene*	<0.050	0.050	06/02/2024	ND	2.08	104	2.00	7.57		
Ethylbenzene*	<0.050	0.050	06/02/2024	ND	2.05	102	2.00	6.31		
Total Xylenes*	<0.150	0.150	06/02/2024	ND	6.35	106	6.00	6.13		
Total BTEX	<0.300	0.300	06/02/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 106 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	608	16.0	06/03/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/31/2024	ND	188	93.9	200	3.85	
DRO >C10-C28*	10.5	10.0	05/31/2024	ND	177	88.3	200	4.84	
EXT DRO >C28-C36	<10.0	10.0	05/31/2024	ND					

Surrogate: 1-Chlorooctane 78.4 % 48.2-134

Surrogate: 1-Chlorooctadecane 77.0 % 49.1-148

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/31/2024	Sampling Date:	05/31/2024
Reported:	06/03/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE #006 H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Shalyn Rodriguez
Project Location:	EDDY CO NM		

Sample ID: WSW - 1 (6') (H243055-03)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	06/02/2024	ND	1.97	98.7	2.00	8.18		
Toluene*	<0.050	0.050	06/02/2024	ND	2.08	104	2.00	7.57		
Ethylbenzene*	<0.050	0.050	06/02/2024	ND	2.05	102	2.00	6.31		
Total Xylenes*	<0.150	0.150	06/02/2024	ND	6.35	106	6.00	6.13		
Total BTEX	<0.300	0.300	06/02/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 107 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	80.0	16.0	06/03/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/31/2024	ND	188	93.9	200	3.85	
DRO >C10-C28*	<10.0	10.0	05/31/2024	ND	177	88.3	200	4.84	
EXT DRO >C28-C36	<10.0	10.0	05/31/2024	ND					

Surrogate: 1-Chlorooctane 80.6 % 48.2-134

Surrogate: 1-Chlorooctadecane 78.7 % 49.1-148

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/31/2024	Sampling Date:	05/31/2024
Reported:	06/03/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE #006 H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Shalyn Rodriguez
Project Location:	EDDY CO NM		

Sample ID: WSW - 2 (4') (H243055-04)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	06/02/2024	ND	1.97	98.7	2.00	8.18		
Toluene*	<0.050	0.050	06/02/2024	ND	2.08	104	2.00	7.57		
Ethylbenzene*	<0.050	0.050	06/02/2024	ND	2.05	102	2.00	6.31		
Total Xylenes*	<0.150	0.150	06/02/2024	ND	6.35	106	6.00	6.13		
Total BTEX	<0.300	0.300	06/02/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 104 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	112	16.0	06/03/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/31/2024	ND	188	93.9	200	3.85	
DRO >C10-C28*	<10.0	10.0	05/31/2024	ND	177	88.3	200	4.84	
EXT DRO >C28-C36	<10.0	10.0	05/31/2024	ND					

Surrogate: 1-Chlorooctane 81.1 % 48.2-134

Surrogate: 1-Chlorooctadecane 79.3 % 49.1-148

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/31/2024	Sampling Date:	05/31/2024
Reported:	06/03/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE #006 H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Shalyn Rodriguez
Project Location:	EDDY CO NM		

Sample ID: SSW - 1 (4') (H243055-05)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/02/2024	ND	1.97	98.7	2.00	8.18	
Toluene*	<0.050	0.050	06/02/2024	ND	2.08	104	2.00	7.57	
Ethylbenzene*	<0.050	0.050	06/02/2024	ND	2.05	102	2.00	6.31	
Total Xylenes*	<0.150	0.150	06/02/2024	ND	6.35	106	6.00	6.13	
Total BTEX	<0.300	0.300	06/02/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 106 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	272	16.0	06/03/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	<10.0	10.0	05/31/2024	ND	188	93.9	200	3.85		
DRO >C10-C28*	<10.0	10.0	05/31/2024	ND	177	88.3	200	4.84		
EXT DRO >C28-C36	<10.0	10.0	05/31/2024	ND						

Surrogate: 1-Chlorooctane 87.4 % 48.2-134

Surrogate: 1-Chlorooctadecane 86.9 % 49.1-148

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/31/2024	Sampling Date:	05/31/2024
Reported:	06/03/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE #006 H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Shalyn Rodriguez
Project Location:	EDDY CO NM		

Sample ID: FS - 7 (1') (H243055-06)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/02/2024	ND	1.97	98.7	2.00	8.18	
Toluene*	<0.050	0.050	06/02/2024	ND	2.08	104	2.00	7.57	
Ethylbenzene*	<0.050	0.050	06/02/2024	ND	2.05	102	2.00	6.31	
Total Xylenes*	<0.150	0.150	06/02/2024	ND	6.35	106	6.00	6.13	
Total BTEX	<0.300	0.300	06/02/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	336	16.0	06/03/2024	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/31/2024	ND	188	93.9	200	3.85	
DRO >C10-C28*	<10.0	10.0	05/31/2024	ND	177	88.3	200	4.84	
EXT DRO >C28-C36	<10.0	10.0	05/31/2024	ND					

Surrogate: 1-Chlorooctane 77.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 76.9 % 49.1-148

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

- QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
- 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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A handwritten signature in black ink, appearing to read "Mike Snyder", is written over a horizontal line.

Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



Page 9 of 9

† Cardinal cannot accept verbal. Please email changes to celey.keene@cardinallabsnm.com



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

June 05, 2024

NICHOLAS POOLE

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: HONEY GRAHAM 29 STATE #006 H

Enclosed are the results of analyses for samples received by the laboratory on 06/04/24 15:42.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-23-16. 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 accredited 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,

A handwritten signature in black ink that reads "Mike Snyder". The signature is fluid and cursive, with the first name "Mike" and last name "Snyder" clearly distinguishable.

Mike Snyder For Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	06/04/2024	Sampling Date:	06/04/2024
Reported:	06/05/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE #006 H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Alyssa Parras
Project Location:	EDDY CO NM		

Sample ID: FS - 1 (H243156-01)

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	06/04/2024	ND	2.06	103	2.00	1.40		
Toluene*	<0.050	0.050	06/04/2024	ND	2.21	111	2.00	0.368		
Ethylbenzene*	<0.050	0.050	06/04/2024	ND	2.23	112	2.00	1.64		
Total Xylenes*	<0.150	0.150	06/04/2024	ND	6.83	114	6.00	2.00		
Total BTEX	<0.300	0.300	06/04/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 106 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	160	16.0	06/05/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/05/2024	ND	190	95.0	200	0.789	
DRO >C10-C28*	<10.0	10.0	06/05/2024	ND	184	91.9	200	0.999	
EXT DRO >C28-C36	<10.0	10.0	06/05/2024	ND					

Surrogate: 1-Chlorooctane 86.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 86.6 % 49.1-148

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	06/04/2024	Sampling Date:	06/04/2024
Reported:	06/05/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE #006 H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Alyssa Parras
Project Location:	EDDY CO NM		

Sample ID: FS - 2 (8') (H243156-02)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/04/2024	ND	2.06	103	2.00	1.40	
Toluene*	<0.050	0.050	06/04/2024	ND	2.21	111	2.00	0.368	
Ethylbenzene*	<0.050	0.050	06/04/2024	ND	2.23	112	2.00	1.64	
Total Xylenes*	<0.150	0.150	06/04/2024	ND	6.83	114	6.00	2.00	
Total BTEX	<0.300	0.300	06/04/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 106 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	144	16.0	06/05/2024	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/05/2024	ND	236	118	200	4.21	
DRO >C10-C28*	<10.0	10.0	06/05/2024	ND	238	119	200	3.48	
EXT DRO >C28-C36	<10.0	10.0	06/05/2024	ND					

Surrogate: 1-Chlorooctane 110 % 48.2-134

Surrogate: 1-Chlorooctadecane 117 % 49.1-148

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	06/04/2024	Sampling Date:	06/04/2024
Reported:	06/05/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE #006 H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Alyssa Parras
Project Location:	EDDY CO NM		

Sample ID: FS - 3 (10') (H243156-03)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	06/04/2024	ND	2.06	103	2.00	1.40		
Toluene*	<0.050	0.050	06/04/2024	ND	2.21	111	2.00	0.368		
Ethylbenzene*	<0.050	0.050	06/04/2024	ND	2.23	112	2.00	1.64		
Total Xylenes*	<0.150	0.150	06/04/2024	ND	6.83	114	6.00	2.00		
Total BTEX	<0.300	0.300	06/04/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	96.0	16.0	06/05/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	<10.0	10.0	06/05/2024	ND	236	118	200	4.21		
DRO >C10-C28*	<10.0	10.0	06/05/2024	ND	238	119	200	3.48		
EXT DRO >C28-C36	<10.0	10.0	06/05/2024	ND						

Surrogate: 1-Chlorooctane 108 % 48.2-134

Surrogate: 1-Chlorooctadecane 108 % 49.1-148

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	06/04/2024	Sampling Date:	06/04/2024
Reported:	06/05/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE #006 H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Alyssa Parras
Project Location:	EDDY CO NM		

Sample ID: ESW - 3 (6') (H243156-04)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/04/2024	ND	2.06	103	2.00	1.40	
Toluene*	<0.050	0.050	06/04/2024	ND	2.21	111	2.00	0.368	
Ethylbenzene*	<0.050	0.050	06/04/2024	ND	2.23	112	2.00	1.64	
Total Xylenes*	<0.150	0.150	06/04/2024	ND	6.83	114	6.00	2.00	
Total BTEX	<0.300	0.300	06/04/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	06/05/2024	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/05/2024	ND	236	118	200	4.21	
DRO >C10-C28*	<10.0	10.0	06/05/2024	ND	238	119	200	3.48	
EXT DRO >C28-C36	<10.0	10.0	06/05/2024	ND					

Surrogate: 1-Chlorooctane 111 % 48.2-134

Surrogate: 1-Chlorooctadecane 108 % 49.1-148

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	06/04/2024	Sampling Date:	06/04/2024
Reported:	06/05/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE #006 H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Alyssa Parras
Project Location:	EDDY CO NM		

Sample ID: FS - 5 (5') (H243156-05)

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/04/2024	ND	2.06	103	2.00	1.40	
Toluene*	<0.050	0.050	06/04/2024	ND	2.21	111	2.00	0.368	
Ethylbenzene*	<0.050	0.050	06/04/2024	ND	2.23	112	2.00	1.64	
Total Xylenes*	<0.150	0.150	06/04/2024	ND	6.83	114	6.00	2.00	
Total BTX	<0.300	0.300	06/04/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 106 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	06/05/2024	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/05/2024	ND	236	118	200	4.21	
DRO >C10-C28*	<10.0	10.0	06/05/2024	ND	238	119	200	3.48	
EXT DRO >C28-C36	<10.0	10.0	06/05/2024	ND					

Surrogate: 1-Chlorooctane 105 % 48.2-134

Surrogate: 1-Chlorooctadecane 104 % 49.1-148

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Notes and Definitions

- BS-3 Blank spike recovery outside of lab established statistical limits, but still within method limits. Data is not adversely affected.
- 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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A handwritten signature in black ink, appearing to read "Mike Snyder".

Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

Page 8 of 8



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

June 06, 2024

NICHOLAS POOLE

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: HONEY GRAHAM 29 STATE #006 H

Enclosed are the results of analyses for samples received by the laboratory on 06/05/24 16:47.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-23-16. 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 accredited 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,

A handwritten signature in black ink that reads "Mike Snyder". The signature is fluid and cursive, with the first name "Mike" and last name "Snyder" clearly distinguishable.

Mike Snyder For Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	06/05/2024	Sampling Date:	06/05/2024
Reported:	06/06/2024	Sampling Type:	Soil
Project Name:	HONEY GRAHAM 29 STATE #006 H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Shalyn Rodriguez
Project Location:	EDDY CO NM		

Sample ID: FS - 4 (H243208-01)

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/05/2024	ND	2.00	100	2.00	6.35	
Toluene*	<0.050	0.050	06/05/2024	ND	1.96	98.0	2.00	4.64	
Ethylbenzene*	<0.050	0.050	06/05/2024	ND	1.98	98.8	2.00	3.35	
Total Xylenes*	<0.150	0.150	06/05/2024	ND	5.71	95.1	6.00	3.27	
Total BTEX	<0.300	0.300	06/05/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 82.6 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	416	16.0	06/06/2024	ND	416	104	400	7.41	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/05/2024	ND	207	104	200	6.12	
DRO >C10-C28*	<10.0	10.0	06/05/2024	ND	188	94.1	200	9.58	
EXT DRO >C28-C36	<10.0	10.0	06/05/2024	ND					

Surrogate: 1-Chlorooctane 100 % 48.2-134

Surrogate: 1-Chlorooctadecane 107 % 49.1-148

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*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

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

Cardinal Laboratories

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A handwritten signature in black ink, appearing to read "Mike Snyder", is written over a horizontal line.

Mike Snyder For Celey D. Keene, Lab Director/Quality Manager

101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

BILL TO

ANALYSIS REQUEST

Company Name:

Conoco Phillips

P.O. #:

Project Manager:

Nichols Poole

Company: F&T Tech

Address:

City:

State: Zip:

Attn: Nichols Poole

Phone #:

Fax #:

Address:

Project #:

Project Owner:

City:

State:

Zip:

Project Name: Honey Graham 29 State #006H

Project Location: Eddy Co, NM

Phone #:

Sample Name:

Andrew Garcia

Fax #:

FOR LAB USE ONLY

Lab I.D.

Sample I.D.

HQ43208
1

FS-4

(G)RAB OR (C)OMP.

CONTAINERS

GROUNDWATER

WASTEWATER

SOIL

OIL

SLUDGE

OTHER:

ACID/BASE:

ICE / COOL

OTHER:

DATE TIME

6/5/24 1200

X

X

X

TPH

BTEX

Chloride

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Relinquished By:

Date:

Received By:

Relinquished By:

Date:

Received By:

Delivered By: (Circle One)

Observed Temp. °C

Sample Condition

CHECKED BY:

Turnaround Time:

Standard

Bacteria (only)

Cool Intact

Observed Temp. °C

REMARKS:

Nichols Poole at fatch.com

Andrew Garcia at fatch.com



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

February 20, 2024

CHRISTIAN LLULL

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: ILLUSTRATED MAN FEE COM 1H RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 02/15/24 15:06.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-23-16. 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 accredited 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,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	02/15/2024	Sampling Date:	02/15/2024
Reported:	02/20/2024	Sampling Type:	Soil
Project Name:	ILLUSTRATED MAN FEE COM 1H RELEAS	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02936	Sample Received By:	Shalyn Rodriguez
Project Location:	COP - EDDY CO, NEW MEXICO		

Sample ID: BACKFILL - COMPOSITE (H240744-01)

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/16/2024	ND	1.89	94.7	2.00	13.0	
Toluene*	<0.050	0.050	02/16/2024	ND	1.79	89.4	2.00	17.1	
Ethylbenzene*	<0.050	0.050	02/16/2024	ND	1.81	90.5	2.00	18.4	
Total Xylenes*	<0.150	0.150	02/16/2024	ND	5.33	88.9	6.00	18.4	
Total BTX	<0.300	0.300	02/16/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 95.8 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	224	16.0	02/16/2024	ND	432	108	400	3.64		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/19/2024	ND	215	107	200	0.835	
DRO >C10-C28*	<10.0	10.0	02/19/2024	ND	206	103	200	2.82	
EXT DRO >C28-C36	<10.0	10.0	02/19/2024	ND					

Surrogate: 1-Chlorooctane 67.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 60.5 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

QR-04	The RPD for the BS/BSD was outside of historical limits.
BS-3	Blank spike recovery outside of lab established statistical limits, but still within method limits. Data is not adversely affected.
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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A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager



101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: <u>Conoco-Phillips</u>		P.O. #:		BILL TO										ANALYSIS REQUEST									
Project Manager: <u>Christian Lundy</u>		City:		State:		Zip:		Company: <u>Fetra Tech</u>		Attn: <u>Christian Lundy</u>		Address:		City:		State:		Zip:		Phone #:		Fax #:	
Project #: <u>212C-MD-02936</u>		Project Owner: <u>Man Fec Com #001H</u>		City:		State:		Zip:		Phone #:		Fax #:		City:		State:		Zip:		Phone #:		Fax #:	
Project Location: <u>Eddy Co, NM</u>		Project Name: <u>Andrew Garcia</u>		City:		State:		Zip:		Phone #:		Fax #:		City:		State:		Zip:		Phone #:		Fax #:	
Sample Name: <u>Andrew Garcia</u>		FOR LAB USE ONLY		Matrix		PRESERV.		SAMPLING		DATE		TIME		TPH		BTX		Chlorides					
Lab I.D. <u>H240744</u>		Sample I.D. <u>Backfill - Composite</u>		(G)RAB OR (C)OMP.		# CONTAINERS		GROUNDWATER		WASTEWATER		SOIL		OIL		SLUDGE		OTHER :		ACID/BASE:		ICE / COOL	
				C 1				X												X		2024	
																						15 Feb	
																						DATE	
																						TIME	
																						1200	
																						X	
																						X	
																						X	

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QUESTIONS

Action 370834

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 370834
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2313129153
Incident Name	NAPP2313129153 HONEY GRAHAM 29 STATE COM 006H @ 0
Incident Type	Release Other
Incident Status	Reclamation Report Received
Incident Facility	[fAPP2203946381] HONEY GRAHAM 29 ST

Location of Release Source	
Please answer all the questions in this group.	
Site Name	HONEY GRAHAM 29 STATE COM 006H
Date Release Discovered	04/18/2023
Surface Owner	State

Incident Details	
Please answer all the questions in this group.	
Incident Type	Release Other
Did this release result in a fire or is the result of a fire	No
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	
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.	
Crude Oil Released (bbls) Details	Cause: Corrosion Tank (Any) Crude Oil Released: 50 BBL Recovered: 0 BBL Lost: 50 BBL.
Produced Water Released (bbls) Details	Cause: Corrosion Tank (Any) Produced Water Released: 130 BBL Recovered: 0 BBL Lost: 130 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 370834

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	370834
Action Type:	
[C-141] Reclamation Report C-141 (C-141-v-Reclamation)	

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be 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: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
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: Christian LLuLL Title: Project Manager Email: christian.llull@tetrattech.com Date: 02/09/2024
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QUESTIONS, Page 3

Action 370834

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	370834
Action Type:	
[C-141] Reclamation Report C-141 (C-141-v-Reclamation)	

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 ½ and 1 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Greater than 5 (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Greater than 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	High
A 100-year floodplain	Zero feet, overlying, or within area
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)	2240
TPH (GRO+DRO+MRO)	(EPA SW-846 Method 8015M)	14940
GRO+DRO	(EPA SW-846 Method 8015M)	10690
BTEX	(EPA SW-846 Method 8021B or 8260B)	226
Benzene	(EPA SW-846 Method 8021B or 8260B)	7.6

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	07/07/2024
On what date will (or did) the final sampling or liner inspection occur	07/09/2024
On what date will (or was) the remediation complete(d)	07/31/2024
What is the estimated surface area (in square feet) that will be reclaimed	5896
What is the estimated volume (in cubic yards) that will be reclaimed	1681
What is the estimated surface area (in square feet) that will be remediated	5896
What is the estimated volume (in cubic yards) that will be remediated	1681

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 370834

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	370834
	Action Type:	
	[C-141] Reclamation Report C-141 (C-141-v-Reclamation)	

QUESTIONS

Remediation Plan (continued)	
<i>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.</i>	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
<i>(Select all answers below that apply.)</i>	
(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	HALFWAY DISPOSAL AND LANDFILL [fEEM0112334510]
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	No
OR is the off-site disposal site, to be used, an NMED facility	No
(Ex Situ) Excavation and on-site remediation (i.e. On-Site Land Farms)	No
(In Situ) Soil Vapor Extraction	No
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	No
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	No
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	No
Ground Water Abatement pursuant to 19.15.30 NMAC	No
OTHER (Non-listed remedial process)	No
<i>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>	
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: Christian LLuLL Title: Project Manager Email: christian.llull@tetrattech.com Date: 02/09/2024
<i>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.</i>	

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QUESTIONS, Page 5

Action 370834

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 370834
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

Deferral Requests Only	
<i>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.</i>	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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QUESTIONS, Page 6

Action 370834

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	370834
Action Type:	
[C-141] Reclamation Report C-141 (C-141-v-Reclamation)	

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	345965
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	05/22/2024
What was the (estimated) number of samples that were to be gathered	16
What was the sampling surface area in square feet	6080

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	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion	Yes
What was the total surface area (in square feet) remediated	7576
What was the total volume (cubic yards) remediated	2933
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene	Yes
What was the total surface area (in square feet) reclaimed	9364
What was the total volume (in cubic yards) reclaimed	2933
Summarize any additional remediation activities not included by answers (above)	Initial confirmation soil sampling analytical results associated with locations FS-2, FS-3, FS-5, FS-7, ESW- 3, SSW-1, WSW-1, and WSW-2 exceeded the TPH RRAL of 100 mg/kg, and/or the chloride RRAL of 600 mg/kg. After the areas identified with exceedances were deepened and/or expanded, iterative confirmation samples were collected to encompass the original sample locations that triggered removal (nomenclature defined in Table 3) post-additional excavation.

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 (in .pdf format) 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.

I hereby agree and sign off to the above statement	Name: Christian LLuLL Title: Project Manager Email: christian.llull@tetratech.com Date: 08/06/2024
--	---

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QUESTIONS, Page 7

Action 370834

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	370834
	Action Type:
	[C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

Reclamation Report	
Only answer the questions in this group if all reclamation steps have been completed.	
Requesting a reclamation approval with this submission	Yes
What was the total reclamation surface area (in square feet) for this site	9364
What was the total volume of replacement material (in cubic yards) for this site	2933
Per Paragraph (1) of Subsection D of 19.15.29.13 NMAC the reclamation must contain a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, or other test methods approved by the division. The soil cover must include a top layer, which is either the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater.	
Is the soil top layer complete and is it suitable material to establish vegetation	Yes
On what (estimated) date will (or was) the reseeding commence(d)	06/14/2024
Summarize any additional reclamation activities not included by answers (above)	Once acceptable confirmation sample results were received, the excavation was backfilled with clean material to pre-release grade. In accordance with 19.15.29.12 NMAC, the reclaimed area contained a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by SM4500CI-B. The soil cover included a top layer consisting of one foot of suitable material to establish vegetation at the site. The backfilled areas in the former tank battery area and pasture were seeded following backfilling, to aid in revegetation. Based on the soils of the site, the NMSLO Loamy (L) Sites Seed Mixture was used for seeding and was planted in the amount specified in the pounds pure live seed (PLS) per acre. One (1) representative 5-point composite sample was collected from the backfill material used for the reclamation of the project site.
The responsible party must attach information demonstrating they have complied with all applicable reclamation requirements and any conditions or directives of the OCD. This demonstration should be in the form of attachments (in .pdf format) including a scaled site map, any proposed reseeding plans or relevant field notes, photographs of reclaimed area, and a narrative of the reclamation activities. Refer to 19.15.29.13 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.	
I hereby agree and sign off to the above statement	Name: Christian LLuLL Title: Project Manager Email: christian.llull@tetratech.com Date: 08/06/2024

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QUESTIONS, Page 8

Action 370834

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	370834
Action Type:	
[C-141] Reclamation Report C-141 (C-141-v-Reclamation)	

QUESTIONS

Revegetation Report	
Only answer the questions in this group if all surface restoration, reclamation and re-vegetation obligations have been satisfied.	
Requesting a restoration complete approval with this submission	No
Per Paragraph (4) of Subsection (D) of 19.15.29.13 NMAC for any major or minor release containing liquids, the responsible party must notify the division when reclamation and re-vegetation are complete.	

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CONDITIONS

Action 370834

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 370834
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

CONDITIONS

Created By	Condition	Condition Date
scwells	Reclamation approved. Sampling notices were not submitted for confirmation samples collected on 5/31/24 and 6/4/24.	8/7/2024
scwells	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	8/7/2024