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

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office. For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Lit Lalout Landa Long of	RECEIVED By kcollins at 8:42 am, Apr 05, 2016
Proposed Alternative Method Permit or Closure Plan Application	
Type of action: Below grade tank registration Permit of a pit or proposed alternative method Closure of a pit, below-grade tank, or proposed alternative method Modification to an existing permit/or registration Closure plan only submitted for an existing permitted or non-permitted pit, below or proposed alternative method	
Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative	e request
Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface wate environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rule	er, ground water or the es, regulations or ordinances.
1. Operator: Burlington Resources Oil & Gas Company, LP_OGRID #:14538 Address: PO BOX 4289, Farmington, NM 87499 Facility or well name: HUERFANO UNIT 168E API Number:	BGT CLOSED PRIOR TO CLOSURE PLAN APPROVAL
U/L or Qtr/Qtr A (NENE) Section 23 Township 26N Range 10W County: San Ju Center of Proposed Design: Latitude 36.477849 •N Longitude -107.860171 •W NAD: 1927 ⊠ 1983 Surface Owner: ⊠ Federal ☐ State Private Tribal Trust or Indian Allotment	uan
 2. Pit: Subsection F, G or J of 19.15.17.11 NMAC Temporary: Drilling Workover Permanent Emergency Cavitation P&A Multi-Well Fluid Management Low Chloride Drilling Fluid Lined Unlined Liner type: Thickness mil LLDPE HDPE PVC Other String-Reinforced Liner Seams: Welded Factory Other Other Volume: bbl Dimensions: L x W x I 	
3.	
 4. Alternative Method: Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for contract of the Santa Fe Environment	onsideration of approval.
 5. Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks) Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence institution or church) Four foot height, four strands of barbed wire evenly spaced between one and four feet Alternate. Please specify 	ee, school, hospital,

alb

6. N

7.

8.

letting:	Subsection	E of 19.	15.17.11	NMAC	(Applies t	o permanent	pits and	permanent	open top	tanks)
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Screen Netting Other

Monthly inspections (If netting or screening is not physically feasible)

Signs: Subsection C of 19.15.17.11 NMAC

12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers

Signed in compliance with 19.15.16.8 NMAC

Variances and Exceptions:

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

Please check a box if one or more of the following is requested, if not leave blank:

Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.
 Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

Siting Criteria (regarding permitting): 19.15.17.10 NMAC

Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.

General siting	
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank	□ Yes □ No ⊠ NA
Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit. NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ⊠ NA
 Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (Does not apply to below grade tanks) Written confirmation or verification from the municipality; Written approval obtained from the municipality 	🗌 Yes 🗌 No
 Within the area overlying a subsurface mine. (Does not apply to below grade tanks) Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division 	🗌 Yes 🗌 No
 Within an unstable area. (Does not apply to below grade tanks) Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map 	🗌 Yes 🗌 No
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map	🗌 Yes 🗌 No
Below Grade Tanks	
 Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). Topographic map; Visual inspection (certification) of the proposed site 	🗌 Yes 🛛 No
 Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site 	🗌 Yes 🛛 No
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)	
 Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.) Topographic map; Visual inspection (certification) of the proposed site 	🗌 Yes 🗌 No
Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.	🗌 Yes 🗌 No
 Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 	
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	🗌 Yes 🗌 No

 Within 100 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site 	🗌 Yes 🗌 No
Temporary Pit Non-low chloride drilling fluid	
 Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). Topographic map; Visual inspection (certification) of the proposed site 	🗌 Yes 🗌 No
 Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 	🗌 Yes 🗌 No
 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, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application; NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site 	🗌 Yes 🗌 No
 Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site 	🗌 Yes 🗌 No
Permanent Pit or Multi-Well Fluid Management Pit	
 Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). Topographic map; Visual inspection (certification) of the proposed site 	🗌 Yes 🗌 No
 Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 	🗌 Yes 🗌 No
 Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site 	🗌 Yes 🗌 No
 Within 500 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site 	🗌 Yes 🗌 No
10. Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 N. Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doce attached. Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.10 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.1 and 19.15.17.13 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number:	nmac NMAC 15.17.9 NMAC
11. Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doc attached. Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC A List of wells with approved application for permit to drill associated with the pit. Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19. and 19.15.17.13 NMAC Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.10 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number:	15.17.9 NMAC

12. <u>Permanent Pits Permit Application Checklist</u> : Subsection B of 19.15.17.9 NMAC <i>Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the of</i>	documents are
attached. Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC 	
 Climatological Factors Assessment Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC Quality Control/Quality Assurance Construction and Installation Plan Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Nuisance or Hazardous Odors, including H₂S, Prevention Plan Emergency Response Plan Oil Field Waste Stream Characterization Monitoring and Inspection Plan 	
 Erosion Control Plan Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC 	
13. Proposed Closure: 19.15.17.13 NMAC Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan. Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well Fl Alternative Proposed Closure Method: Waste Excavation and Removal Waste Removal (Closed-loop systems only) On-site Closure Method (Only for temporary pits and closed-loop systems) In-place Burial On-site Trench Burial Alternative Closure Method	uid Management Pit
 Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be a closure plan. Please indicate, by a check mark in the box, that the documents are attached. Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings) Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC 	attached to the
15.	
Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. F 19.15.17.10 NMAC for guidance.	
Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	□ Yes □ No □ NA
 Ground water is more than 100 feet below the bottom of the buried waste. NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells 	☐ Yes ☐ No ☐ NA
 Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). Topographic map; Visual inspection (certification) of the proposed site 	🗌 Yes 🗌 No
 Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 	🗌 Yes 🗌 No
 Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site 	🗌 Yes 🗌 No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	🗌 Yes 🗌 No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	□ Yes □ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	
Form C-144 Oil Conservation Division Page 4 of	6

- Written confirmation or verification from the municipality; Written approval obtained from the municipality	🗌 Yes 🗌 No
 Within the area overlying a subsurface mine. Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division 	🗋 Yes 🗌 No
 Within an unstable area. Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological 	
Society; Topographic map Within a 100-year floodplain.	🗌 Yes 🗌 No
- FEMA map	🗌 Yes 🗌 No
 16. On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure play a check mark in the box, that the documents are attached. Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.13 NMAC Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.13 NMAC Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards canned Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC 	11 NMAC 15.17.11 NMAC
17. Operator Application Certification:	
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and beli	
Name (Print): Title:	
Signature: Date:	
e-mail address: Telephone:	
18. OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)	
18. <u>OCD Approval:</u> Permit Application (including closure plan) \square Closure Plan (only) \square OCD Conditions (see attachment)	
18. OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature:	016
 18. OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: 7/12/20 Title: Compliance Officer OCD Permit Number: 19. Closure Report (required within 60 days of closure completion): 19.15.17.13 NMAC Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not section of the form until an approved closure plan has been obtained and the closure activities have been completed. 	016

22. Operator Closure Certification:

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print)	Crystal Walker	Title:Regula	atory Coordinator		
Signature:	Gotal Wal	'ker	Date:	4/1/16	
e-mail address:	crystal.walker@cop.com Tele	phone: (505) 326-98	37	-	

Burlington Resources Oil & Gas Company San Juan Basin: New Mexico Assets Below Grade Tank Closure Report

Lease Name: Huerfano Unit 168E API No.: 30-045-26677

In accordance with Rule 19.15.17.13 NMAC, the following information describes the closure of the below-grade tank referenced above. All proper documentation regarding closure activities is being included with the C-144.

General Plan Requirements:

1. Prior to initiating any BGT closure, except in the case of an emergency, BR will notify the surface owner of the intent to close the BGT by certified mail no later than 72 hours or one week before closure and a copy of this notification will be included in the closure report. In the case of an emergency, the surface owner will be notified as soon as practical.

The surface owner notification was not found.

- 2. Notice of closure will be given to the District Division office between 72 hours and one week of the scheduled closure via email or phone. The notification of closure will include the following:
 - a. Operators Name
 - b. Well Name and API Number
 - c. Location

Notification was not found.

 All liquids will be removed from the BGT following cessation of operation. Produced water will be disposed of at one of COP's approved Salt Water Disposal facilities or at a District Division approved facility.

All recovered liquids were disposed of at an approved SWD facility or an approved District Division facility within 60 days of cessation of operation.

 Solids and sludge's will be shoveled and/or vacuumed out for disposal at one of the District Division approved facilities, depending on the proximity of the BGT site: Envirotech Land Farm (Permit #NM-01-011), JFJ Land Farm % Industrial Ecosystems Inc. (Permit #NM-01-0010B), and Basin Disposal (Permit #NM-01-005).

Any sludge or soil required to be removed to facilitate closure was transported to Envirotech Land Farm (Permit # NM-01-011) and/or JFJ Landfarm % IEI (Permit# NM-01-0010B).

5. BR will obtain prior approval from District Division to dispose, recycle, reuse, or reclaim the BGT and provide documentation of the disposition of the BGT in the closure report. Steel materials will be recycled or reused as approved by the District Division. Fiberglass tanks will be empty, cut up or shredded, and EPA cleaned for disposal as solid waste. Liner materials will be cleaned without soils or contaminated material for disposal as solid waste. Fiberglass tanks and liner materials will meet the conditions of 19.15.35 NMAC. Disposal

will be at a licensed disposal facility, presently San Juan County Landfill operated by Waste Management under NMED Permit SWM-052426.

The below-grade tank was disposed of in a division-approved manner. The liner was cleaned per 19.15.35.8.C(1)(m) NMAC and disposed of at the San Juan County Regional Landfill located on CR 3100.

6. Any equipment associated with the BGT that is no longer required for some other purpose, following the closure, will be removed.

All on-site equipment associated with the below-grade tank was removed.

- 7. Following removal of the tank and any liner material, BR will test the soils beneath the BGT as follows:
 - a. At a minimum, a five-point composite sample will be taken to include any obvious stained or wet soils or any other evidence of contamination.
 - b. The laboratory sample shall be analyzed for the constituents listed in Table I of 19.15.17.13.

A five point composite sample was taken of the below-grade tank using sampling tools and all samples tested per Table I of 19.15.17.13 and the results are attached.

8. If the District Division and/or BR determine there is a release, BR will comply with 19.15.17.13.C.3b.

A release was not determined for the above referenced well.

9. Upon completion of the tank removal, pursuant to 19.15.17.13.C.3c, if all contaminant concentrations are less than or equal to the parameters listed in Table I of 19.15.17.13 NMAC, the excavation will be backfilled with non-waste earthen material compacted and covered with a minimum of one foot top soil or background thickness whichever is greater and to existing grade. The surface will be re-contoured to match the native grade and to prevent ponding.

The tank removal area passed all requirements of Table I of 19.15.17.13 NMAC and was backfilled with compacted, non-waste containing, earthen material which included at least one foot of suitable material to establish vegetation at the site.

10. For those portions of the former BGT area no longer required for production activities, BR will seed the disturbed area the first favorable growing season after the BGT is covered. Seeding will be accomplished via drilling on the contour whenever practical, or by other District Division-approved methods. BR will notify the District Division when reclamation and re-vegetation is complete.

Reclamation of the BGT shall be considered complete when:

- Vegetative cover reflects a life form ratio of +/- 50% of pre disturbance levels.
- Total percent plant cover of at least 70% of pre-disturbance levels (Excluding noxious weeds) OR
- Pursuant to 19.15.17.13.H.5d BR will comply with obligations imposed by other applicable federal or tribal agencies in which there re-vegetation and reclamation

requirements provide equal or better protection of fresh water, human health and the environment.

Provision 10 will be accomplished pursuant to 19.15.17.H.5d and notification will be submitted upon completion.

11. For those portions of the former BGT area required for production activities, reseeding will be done at well abandonment, and following the procedure noted above.

The former BGT area is not required for production activities and reseeding was completed on 12/18/13 per the procedure noted above.

Closure Report:

All closure activities will include proper documentation and will be submitted to OCD within 60 days of the BGT closure on a Closure Report using District Division Form C-144. The Report will include the following:

- Proof of Closure Notice (surface owner and District Division) (Not Attached)
- Backfilling & cover installation (See Report)
- Confirmation Sampling Analytical Results (Attached)
- Application Rate & Seeding techniques (See Report)
- Photo Documentation of Reclamation (Attached)

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit 1 Copy to appropriate District Office to accordance with 19.15.29 NMAC.

1220 S. St. Frai	ncis Dr., Santa	Fe, NM 8750	5			e, NM 87:						
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Surface Ou	vner Federal			Mineral	Junor F	ederal (NM	(01360)		APING	. 30-045-20	6677	
Surface On								-1.4000-1.000-0		7. 30-043-20	0077	
Unit Letter	Section	Township	Range	Feet from the		N OF RE South Line	Feet from the	East/W	/est Line	County		
Α	23	26N	10W	1180	ASA 4.29 (2014)	North	1080	C REPORTED A	East	San Juan		
			Latit	ude <u>36.4778</u>	849	Longitud	le <u>-107.860</u> 1	171	e.			
				NAT	ΓURE	OF REL	EASE					
Type of Rele						Volume of				Recovered		
Source of Re	Source of Release					Date and I	Hour of Occurren	ce	Date and	Hour of Dis	covery	
Was Immedi	ate Notice G		_		1787 - 783)	If YES, To	o Whom?					
			Yes 🗌] No 🛛 Not R	equired							
By Whom?		10				Date and I		.1				
Was a Water	course Reach		Yes 🛛	No		If YES, V	olume Impacting	the wate	rcourse.			
If a Waterco	urca was Imr	noted Decor	ibe Fully	*								
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Describe Ca	use of Proble	m and Reme	dial Actio	n Taken *								
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Describe Are	ea Affected a	nd Cleanup A	Action Tal	ken.*								
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public health	or the enviro	onment. The	acceptan	ce of a C-141 rep	ort by the	e NMOCD n	arked as "Final F	Report" de	bes not reli	ieve the oper	ator of	liability
should their	operations ha	we failed to a	adequately	v investigate and	remediate	e contaminat	ion that pose a thi	reat to gro	ound water	r, surface wa	ter, hu	man health
				otance of a C-141	report de	oes not reliev	e the operator of	responsi	bility for c	ompliance w	vith any	/ other
federal, state							OIL CON	ISERV	ATION	DIVISIC	N	
Signature:	Gé	tal C	Val	ke						<u>D111010</u>		
Printed Nam	/				3	Approved by	Environmental S	Specialist	:			
Title: Regul	atory Coord	linator			a	Approval Da	te:	E	Expiration	Date:		
E-mail Addr		ystal.walker(Øcop.com			Conditions o	f Approval:			A.H. 1. 1		
	1110	DI (50)								Attached		

Date: Ull Phone: (505) 326-9837 * Attach Additional Sheets If Necessary



www.animasenvironmental.com

January 25, 2013

Ashley Maxwell ConocoPhillips San Juan Business Unit Office 216-02 5525 Hwy 64 Farmington, New Mexico 87401

RE: Below Grade Tank Closure Report Huerfano #168E San Juan County, New Mexico

Dear Ms. Maxwell:

Animas Environmental Services, LLC (AES) is pleased to provide the final report associated with the below grade tank (BGT) closure at ConocoPhillips (CoP) Huerfano #168E, located in San Juan County, New Mexico. Tank removal had been completed by CoP contractors prior to AES' arrival at the location.

1.0 Site Information

1.1 Location

Site Name – Huerfano #168E Legal Description – NE¼ NE¼, Section 23, T26N, R10W, San Juan County, New Mexico Well Latitude/Longitude – N36.47767 and W107.86026, respectively BGT Latitude/Longitude – N36.47786 and W107.86018, respectively Land Jurisdiction – Bureau of Land Management (BLM) Figure 1. Topographic Site Location Map Figure 2. Aerial Site Map, January 2013

1.2 NMOCD Ranking

Prior to site work, the New Mexico Oil Conservation Division (NMOCD) database was reviewed, and a cathodic report dated May 1991 for the Huerfano #168E reported the depth to groundwater at 100 feet below ground surface (bgs). The New Mexico Office of the State Engineer (NMOSE) database was reviewed for nearby water wells, and no registered water wells were reported to be located within 1,000 feet of the location. Additionally, Google Earth and the New Mexico Tech Petroleum Recovery Research

Farmington, NM 87401 505-564-2281

624 E. Comanche

Durango, Colorado 970-403-3084

Ashley Maxwell Huerfano #168E BGT Closure Report January 25, 2013 Page 2 of 5

Center online mapping tool (<u>http://ford.nmt.edu/react/project.html</u>) were accessed to aid in the identification of downgradient surface water.

Once on site, AES personnel further assessed the ranking using topographical interpretation, Global Positioning System (GPS) elevation readings, and visual reconnaissance. AES personnel concluded that depth to groundwater at the site was greater than 100 feet bgs. An unnamed ephemeral wash is located approximately 3,400 feet southeast of the location. Based on this information, the location was assessed a ranking score of 0.

1.3 BGT Closure Assessment

AES was initially contacted by Bruce Yazzie, CoP representative, on January 8, 2013, and on January 9, 2013, Heather Woods and Zachary Trujillo of AES mobilized to the location. AES personnel collected six soil samples from below the BGT liner. Four samples were collected from the perimeter of the BGT footprint, one sample was collected from the center of the BGT footprint, and one sample was composited from the four perimeter samples and one center sample.

2.0 Soil Sampling

On January 9, 2013, AES personnel conducted field screening and collected five soil samples (S-1 through S-5) and one 5-point composite (SC-1) from below the BGT. Soil samples were collected from approximately 0.5 feet below the former BGT for field screening of volatile organic compounds (VOCs) and total petroleum hydrocarbon (TPH). Soil sample SC-1 was field screened for VOCs and chloride and was submitted for confirmation laboratory analysis. Soil sample locations are included on Figure 2.

2.1 Field Screening

2.1.1 Volatile Organic Compounds

A portion of each sample was utilized for field screening of VOC vapors with a photoionization detector (PID) organic vapor meter (OVM). Before beginning field screening, the PID-OVM was first calibrated with 100 parts per million (ppm) isobutylene gas.

2.1.2 Total Petroleum Hydrocarbons

Soil samples were also analyzed in the field for TPH per USEPA Method 418.1 using a Buck Scientific Model HC-404 Total Hydrocarbon Analyzer Infrared Spectrometer (Buck). A 3-point calibration was completed prior to conducting soil analyses. Field analytical protocol followed AES's *Standard Operating Procedure: Field Analysis Total Petroleum Hydrocarbons per EPA Method 418.1*.

Ashley Maxwell Huerfano #168E BGT Closure Report January 25, 2013 Page 3 of 5

2.1.3 Chlorides

Soil sample SC-1 was field screened for chlorides using Chloride Drop Count Titration with silver nitrate. Sampling and analysis methods followed procedures provided by Hach Company.

2.2 Laboratory Analyses

The composite soil sample SC-1 collected for laboratory analysis was placed into a new, clean, laboratory-supplied container, which was then labeled, placed on ice, and logged onto a sample chain of custody record. The sample was maintained on ice until delivery to the analytical laboratory, Hall Environmental Analysis Laboratory (Hall), in Albuquerque, New Mexico. Soil sample SC-1 was laboratory analyzed for:

- Benzene, toluene, ethylbenzene, and xylene (BTEX) per U.S. Environmental Protection Agency (USEPA) Method 8021B; and
- Chloride per USEPA Method 300.0.

2.3 Field and Laboratory Analytical Results

Field screening readings for VOCs via OVM ranged from 0.2 ppm in S-4 up to 0.7ppm in S-1. Field TPH concentrations were reported at less than 20.0 mg/kg in all samples. The field chloride concentration in SC-1 was 40 mg/kg. Field screening results are summarized in Table 1 and presented on Figure 2. The AES Field Screening Report is attached.

Sample ID	Date Sampled	Depth below BGT (ft)	VOCs OVM Reading (ppm)	Field TPH (mg/kg)	Field Chlorides (mg/kg)
NMOCD Action L	evel (NMAC 19.	15.17.13E)		100	250
S-1	01/09/13	0.5	0.7	<20.0	NA
S-2	01/09/13	0.5	0.3	<20.0	NA
S-3	01/09/13	0.5	0.3	<20.0	NA
S-4	01/09/13	0.5	0.2	<20.0	NA
S-5	01/09/13	0.5	0.3	<20.0	NA
SC-1	01/09/13	0.5	0.4	NA	40

Table 1. Soil Field Screening VOCs, TPH, and Chloride Results

NA - not analyzed

Ashley Maxwell Huerfano #168E BGT Closure Report January 25, 2013 Page 4 of 5

Laboratory analytical results reported benzene and total BTEX concentrations in SC-1 as less than 0.050 mg/kg and 0.25 mg/kg, respectively. The laboratory chloride concentration was reported below the laboratory detection limit of 30 mg/kg. Laboratory analytical results are summarized in Table 2 and included on Figure 2. Laboratory analytical reports are attached.

Sample ID	Date Sampled	Depth (ft)	Benzene (mg/kg)	BTEX (mg/kg)	TPH- GRO (mg/kg)	TPH- DRO (mg/kg)	Chlorides (mg/kg)
NMOCD Action	Level (NMAC 19.15	5.17.13E)	0.2	50	1	00	250
SC-1	01/09/13	0.5	<0.050	<0.25	NA	NA	<30

Table 2. Soil Laboratory Analytical Results Huerfano #168E BGT Closure, January 2013

NA - not analyzed

3.0 Conclusions and Recommendations

NMOCD action levels for BGT closures are specified in New Mexico Administrative Code (NMAC) 19.15.17.13E. Field TPH concentrations were reported below the NMOCD action level of 100 mg/kg. Benzene and total BTEX concentrations in SC-1 were below the NMOCD action level of 0.2 mg/kg and 50 mg/kg, respectively. Chloride concentrations in SC-1 were also below the NMOCD action level of 250 mg/kg. Based on field screening and laboratory analytical results for benzene, total BTEX, TPH, and chlorides, no further work is recommended at the Huerfano #168E.

If you have any questions about this report or site conditions, please do not hesitate to contact Deborah Watson at (505) 564-2281.

Sincerely,

Lelang Christian

Kelsey Christiansen Environmental Scientist

Elizabeth V Mendly

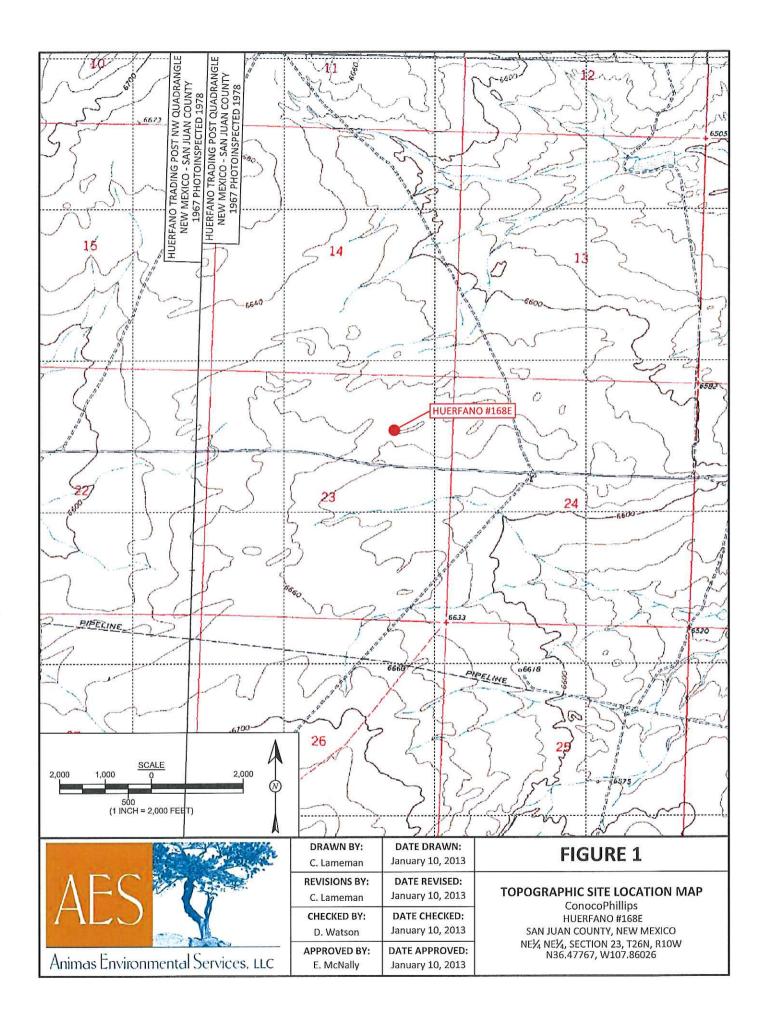
Elizabeth McNally, P.E.

Ashley Maxwell Huerfano #168E BGT Closure Report January 25, 2013 Page 5 of 5

Attachments:

Figure 1. Topographic Site Location Map Figure 2. Aerial Site Map, January 2013 AES Field Screening Report 010913 Hall Analytical Report 1301313

R:\Animas 2000\Dropbox\2013 Projects\ConocoPhillips\Huerfano #168E\Huerfano #168E BGT Closure Report 012513.docx



LEGEND

Sample ID	Date	OVM- PID (ppm)	TPH (mg/kg)	Chlorides (mg/kg) 250 NA		
NMOCD ACT	'ION LEVEL		100			
S-1	1/9/13	0.7	<20.0			
S-2	1/9/13	0.3	<20.0	NA		
S-3	1/9/13	0.3	<20.0	NA		
S-4	1/9/13	0.2	<20.0	NA		
S-5	1/9/13	0.3	<20.0	NA		
SC-1	1/9/13	0.4	NA	40		

		Laborato	ry Analytica	il Results	1000 m	
Sample ID	Date			TPH - GRO (mg/kg)	TPH - DRO (mg/kg)	Chlorides (mg/kg)
NMOCD ACT	ION LEVEL	0.2	50	11	00	250
SC-1	1/9/13	<0.050	<0.25	NA	NA	<30
SAMPLE WAS	ANALYZED	PER EPA MI	ETHOD 802:	LB AND 300	.0.	





AES	Y
Animas Environm	ental Services, LLC

DRAWN BY: DATE DRAWN: C. Lameman January 10, 2013 FIGURE 2

S-1

C. Lamenian	Junuary 10, 2015
REVISIONS BY:	DATE REVISED:
C. Lameman	January 10, 2013
CHECKED BY:	DATE CHECKED:
D. Watson	January 10, 2013
APPROVED BY:	DATE APPROVED:
E. McNally	January 10, 2013

BGT - N36.47786 W107.86018

AERIAL SITE MAP BELOW GRADE TANK CLSOURE JANUARY 2013 ConocoPhillips

HUERFANO #168E SAN JUAN COUNTY, NEW MEXICO NE¼ NE¼, SECTION 23, T26N, R10W N36.47767, W107.86026

AES Field Screening Report

Client: ConocoPhillips

Project Location: Huerfano #168E

Date: 1/9/2013

Matrix: Soil

 and the second second second	Concerning of Automation States	10. Contractor		1		5 million (1997)
ТРН	Analysts Initials	HMW	MMH	MMH	HMW	HMW
	DF	1	1	1	1	1
	TPH PQL (mg/kg)	20.0	20.0	20.0	20.0	20.0
	Field TPH* (mg/kg)	<20.0	<20.0	<20.0	<20.0	<20.0
Field TPH	Analysis Time	9:48	9:51	9:53	9:55	9:57
Field	Chloride (mg/kg)	NA	NA	NA	NA	NA
	(mqq)	0.7	0.3	0.3	0.2	0.3
	Sample Location	North	South	East .	West	Center
Time of	Sample Collection	8:10	8:12	8:14	8:16	8:18
	Collection Date	1/9/2013	1/9/2013	1/9/2013	1/9/2013	1/9/2013
	Sample ID	S-1	S-2	S-3	S-4	S-5

Practical Quantitation Limit PQL

Field Chloride - Quantab Chloride Titrators or Drop Count Titration with

Not Analyzed for TPH.

40

0.4

Composite

8:21

1/9/2013

SC-1

Not Detected at the Reporting Limit QN

Not Analyzed ΝA

Dilution Factor DF

*Field TPH concentrations recorded may be below PQL.

Analyst:

Total Petroleum Hydrocarbons - USEPA 418.1

Silver Nitrate

Heather M. Woods



Animas Environmental Services. LLC

www.animasenvironmental.com

624 E. Comanche Farmington, NM 87401 505-564-2281

Durango, Colorado 970-403-3274



Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87109 TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

January 14, 2013

Debbie Watson Animas Environmental Services 624 East Comanche Farmington, NM 87401 TEL: (505) 486-4071 FAX

RE: CoP Huerfano #168E

OrderNo.: 1301313

Dear Debbie Watson:

Hall Environmental Analysis Laboratory received 1 sample(s) on 1/10/2013 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to <u>www.hallenvironmental.com</u> or the state specific web sites. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. All samples are reported as received unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

Sincerely,

andig

Andy Freeman Laboratory Manager 4901 Hawkins NE Albuquerque, NM 87109

Analytical Report Lab Order 1301313 Date Reported: 1/14/2013

Hall Environmental Analysis Laboratory, Inc.

Client Sample ID: SC-1 **CLIENT:** Animas Environmental Services **Project:** CoP Huerfano #168E Collection Date: 1/9/2013 9:21:00 AM Lab ID: 1301313-001 Matrix: MEOH (SOIL) Received Date: 1/10/2013 9:50:00 AM **RL** Qual Units DF **Date Analyzed** Analyses Result Analyst: NSB EPA METHOD 8021B: VOLATILES Benzene ND 0.050 mg/Kg 1 1/10/2013 12:49:10 PM Toluene ND 0.050 mg/Kg 1 1/10/2013 12:49:10 PM 1/10/2013 12:49:10 PM Ethylbenzene ND 0.050 mg/Kg 1 Xylenes, Total ND 0.10 mg/Kg 1 1/10/2013 12:49:10 PM Surr: 4-Bromofluorobenzene 108 80-120 %REC 1 1/10/2013 12:49:10 PM **EPA METHOD 300.0: ANIONS** Analyst: JRR 20 1/10/2013 11:44:49 AM Chloride ND 30 mg/Kg

Qualifiers:

*

- Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH greater than 2
- RL Reporting Detection Limit

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits

QC SUMMARY REPORT Hall Environmental Analysis Laboratory, Inc.

WO#: 1301313

14-Jan-13

Client: Project:		Environme rfano #168		vices											
Sample ID	MB-5616	SampT	ype: ME	BLK	Tes	TestCode: EPA Method 300.0: Anions									
Client ID:	PBS	Batch	n ID: 56	16	F	RunNo: 7									
Prep Date:	1/10/2013	Analysis D	ate: 1/	10/2013	S	SeqNo: 2	31387	Units: mg/Kg							
Analyte		Result ND	PQL 1.5	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual				
	le ID LCS-5616 SampType: LCS TestCode: EPA Method 300.0: Anions														
								300.0: Anion	S						
Client ID:	LCSS	Batch	1D: 56	16	F	RunNo: 7									
Prep Date:	1/10/2013	Analysis D	ate: 1/	10/2013	5	SeqNo: 2	31388	Units: mg/Kg							
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual				
Chloride		14	1.5	15.00	0	96.6	90	110							
Sample ID	1301229-001BMS	SampT	ype: MS	3	TestCode: EPA Method 300.0: Anions										
Client ID:	BatchQC	Batch	ID: 56	16	F	RunNo: 7									
Prep Date:	1/10/2013	Analysis D	ate: 1/	10/2013	S	SeqNo: 2	31395	Units: mg/Kg							
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual				
Chloride		19	1.5	15.00	4.990	95.2	64.4	117							
Sample ID	1301229-001BMSI) SampT	ype: MS	SD	Tes	tCode: E	PA Method	300.0: Anion	S						
Client ID:	BatchQC	Batch	ID: 56	16	F	RunNo: 7	997								
Prep Date:	1/10/2013	Analysis D	ate: 1/	10/2013	S	SeqNo: 2	31396	Units: mg/K	g						
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual				
Chloride		19	1.5	15.00	4.990	92.0	64.4	117	2.50	20					

Qualifiers:

* Value exceeds Maximum Contaminant Level.

E Value above quantitation range

J Analyte detected below quantitation limits

P Sample pH greater than 2

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits

QC SUMMARY REPORT Hall Environmental Analysis Laboratory, Inc.

WO#: 1301313

14-Jan-13

Client: Project:		Environment rfano #168F		rvices										
Sample ID	MB-5595	SampTy	pe: M	BLK	Tes	TestCode: EPA Method 8021B: Volatiles								
Client ID:	PBS	Batch	ID: 55	595	F	RunNo: 7972								
Prep Date:	1/9/2013	Analysis Da	te: 1	/10/2013	S	eqNo: 2	31100	Units: %RE	С					
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual			
Surr: 4-Brom	ofluorobenzene	1.1		1.000		113	80	120						
Sample ID	LCS-5595	SampTy	pe: LC	CS	Tes	tCode: E	PA Method	8021B: Volat	tiles					
Client ID:	LCSS	Batch	ID: 55	95	F	RunNo: 7972								
Prep Date:	1/9/2013	Analysis Da	te: 1	/10/2013	S	eqNo: 2	31101	Units: %REC						
Analyte		Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD						RPDLimit	Qual					
Surr: 4-Brom	ofluorobenzene	1.1		1.000		114	80	120						
Sample ID	1301229-001AMS	SampTy	pe: M	S	TestCode: EPA Method 8021B: Volatiles									
Client ID:	BatchQC	Batch	ID: 55	95	F									
Prep Date:	1/9/2013	Analysis Da	te: 1	/10/2013	S	eqNo: 2	31104	Units: %RE	С					
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual			
Surr: 4-Brom	ofluorobenzene	1.1		0.9551		111	80	120						
Sample ID	1301229-001AMSE	SampTy	pe: M	SD	Tes	Code: E	PA Method	8021B: Volat	tiles					
Client ID:	BatchQC	Batch I	ID: 55	95	R	unNo: 7	972							
Prep Date:	1/9/2013	Analysis Da	te: 1	/10/2013	S	eqNo: 2	31105	Units: %RE	с					
Analyte		Result	PQL	SPK value	SPK Ref Val		LowLimit	HighLimit	%RPD	RPDLimit	Qual			
Surr: 4-Brom	ofluorobenzene	1.1		0.9569		112	80	120	0	0				

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH greater than 2

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits

ANALYSIS LABORATORY TEL: 505-345-397	Al Analysis Laboratory 4901 Hawkins NE buquerque, NM 87105 75 FAX: 505-345-410; allenvironmental.con
Client Name: Animas Environmental Received by/date: 01/10/13	Work Order Number: 1301313
Logged By: Michel/e Garcia 1/10/2013 9:50:00 AN	1 Minuel Carries
Completed By: Michelle Garcia 1/10/2013 9:56:59 AM	Mitrell Garries
Reviewed By: JES (/is/13	
Chain of Custody	
1. Were seals intact?	Yes 🔲 No 💭 Not Present 🗹
2. Is Chain of Custody complete?	Yes 🗹 No 🗌 Not Present 🗌
3. How was the sample delivered?	Courier
Log in	
	Yes 🗹 No 🗌 🛛 NA 🗌
4. Coolers are present? (see 19. for cooler specific information)	Yes 🗹 No 🗌 NA 🗌
5. Was an attempt made to cool the samples?	Yes 🗹 No 🗌 🛛 NA 🗌
6. Were all samples received at a temperature of >0° C to 6.0° C	Yes 🗹 No 🗌 🛛 NA 🗌
7. Sample(s) in proper container(s)?	Yes 🗹 No 🗔
8. Sufficient sample volume for indicated test(s)?	Yes 🗹 No 🗌
9. Are samples (except VOA and ONG) properly preserved?	Yes 🗹 No 🗌
10. Was preservative added to bottles?	Yes 🗌 No 🗹 🛛 NA 🗌
11. VOA vials have zero headspace?	Yes 🔲 No 💭 No VOA Vials 🗹
12. Were any sample containers received broken?	
 Does paperwork match bottle labels? (Note discrepancies on chain of custody) 	Yes V No H for preserved bottles checked for pH:
14. Are matrices correctly identified on Chain of Custody?	Yes ✓ No (<2 or >12 unless noted)
15. Is it clear what analyses were requested?	Yes 🗹 No 🗌 Adjusted?
16. Were all holding times able to be met? (If no, notify customer for authorization.)	Yes 🗹 No 🗋 Checked by:
<u>Special Handling (if applicable)</u>	
17. Was client notified of all discrepancies with this order?	Yes 🗌 No 🔲 🛛 NA 🗹
Person Notified: Date:	
By Whom: Via:	🗌 eMail 🔄 Phone 🗌 Fax 📋 In Person
Regarding:	
Client Instructions:	
18. Additional remarks:	

19. Cooler Information

Cooler No	Temp °C	Condition.	Seal Intact	Seal No-	Seal Date	Signed By
1	1.0	Good	Yes			

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