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-144
Revised June 6, 2013

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.

Pit, Below-Grade Tank, or
13067 Proposed Alternative Method Permit or Closure Plan Application

OIL CONS. DIV DIST. 3

AUG 14 2015

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-grade tank, or proposed alternative method

45-29217

Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.
Operator: Burlington Resources OGRID #: 14538
Address: PO BOX 4289, Farmington, NM 87499
Facility or well name: Rhodes B 100
API Number: 30-045-29217 OCD Permit Number:
U/L or Qtr/Qtr G Section 20 Township 28N Range 11W County: San Juan
Center of Proposed Design: Latitude 36.65034°N Longitude -108.02476°W NAD: ☐ 1927 ☒ 1983
Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

DENIED
No Closure Completion Date and Closure Report does not follow Approved Closure Plan
BY: Jonathan Kelly
DATE: 10/5/2015 (505) 334-6178 Ext. 122
Please Review, Correct and resubmit Complete Closure packet.

2.
☐ **Pit:** Subsection F, G or J of 19.15.17.11 NM
Temporary: ☐ Drilling ☐ Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ Low Chloride Drilling Fluid ☐ yes ☐ no
☐ Lined ☐ Unlined Liner type: Thickness ____ mil ☒ LLDPE ☐ HDPE ☐ PVC ☐ Other
☐ String-Reinforced
Liner Seams: ☐ Welded ☐ Factory ☐ Other Volume: ____ bbl Dimensions: L____ x W____ x D____

3.
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC
Volume: 120 bbl Type of fluid: Produced Water
Tank Construction material: Metal
☐ Secondary containment with leak detection ☒ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other
Liner type: Thickness 45 mil ☐ HDPE ☐ PVC ☒ Other LLDPE

4.
☐ **Alternative Method:**
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration 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, school, hospital, institution or church)*
☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet
☐ Alternate. Please specify

34 A

6.

Netting: Subsection E of 19.15.17.11 NMAC *(Applies to permanent pits and permanent open top tanks)*

☐ Screen ☐ Netting ☐ Other_____

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

7.

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

8.

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.

9.

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. - ☐ NM Office of the State Engineer - iWATERS database search; ☐ USGS; ☐ Data obtained from nearby wells	☐ 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. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
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 NMAC

Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are 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 19.15.17.11 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 19.15.17.9 NMAC and 19.15.17.13 NMAC

☐ Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____

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 documents are 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 19.15.17.9 NMAC and 19.15.17.13 NMAC
☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 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: _____

12.
Permanent Pits Permit Application 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 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 19.15.17.12 NMAC
- ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Nuisance or Hazardous Odors, including H_2S, 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 Fluid Management Pit ☐ 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

14.
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) ***Instructions: Each of the following items must be attached to the 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

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 source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 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	

adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - 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	☐ Yes ☐ No
Within a 100-year floodplain. - 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 plan. Please indicate, by 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 19.15.17.11 NMAC
- ☐ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ 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 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 cannot be achieved)
- ☐ 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
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 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 belief.

Name (Print): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

18.
OCD Approval: ☐ Permit Application (includi... ☐ ... Conditions (see attachment)

DENIED

OCD Representative Signature: _____ **Approval Date:** _____

Title: _____ **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. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.

☒ **Closure Completion Date:** _____

20.
Closure Method:

☒ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)
☐ If different from approved plan, please explain.

21.
Closure Report Attachment Checklist: ***Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.***

- ☒ Proof of Closure Notice (surface owner and division)
- ☐ Proof of Deed Notice (required for on-site closure for private land only)
- ☐ Plot Plan (for on-site closures and temporary pits)
- ☒ Confirmation Sampling Analytical Results (if applicable)
- ☐ Waste Material Sampling Analytical Results (required for on-site closure)
- ☐ Disposal Facility Name and Permit Number
- ☒ Soil Backfilling and Cover Installation
- ☒ Re-vegetation Application Rates and Seeding Technique
- ☒ Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude _____ °N _____ Longitude _____ °W _____ NAD: ☐ 1927 ☐ 1983

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): Arleen White Title: Staff Regulatory Technician

Signature: Arleen White Date: 8/13/15

e-mail address: Arleen.R.White@conocophillips.com Telephone: (505) 326-9517

Burlington Resources Oil Gas Company, LP
San Juan Basin
Below Grade Tank Closure Report

Lease Name: Rhodes B 100
API No.: 30-045-29217

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:

1. BR shall close a below-grade tank within 60 days of cessation of operations per Subsection G.4 of 19.15.17.13 NMAC. This will include a) below-grade tanks that do not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC; b) an earlier date that the division requires because of imminent danger to fresh water, public health or the environment. For any closure, BR will file the C144 Closure Report as required.

2. **The below-grade tank referenced above was permitted and closed within 60 days of cessation of the below-grade tanks operation.**

3. BR shall remove liquids and sludge from a below-grade tank prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility. The facilities to be used will be Basin Disposal (Permit #NM-01-005), JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B) and Envirotech Land Farm (Permit #NM-01-011). The liner after being cleaned well (Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC) will be disposed of at the San Juan County Regional Landfill located on CR 3100.

   All recovered liquids were disposed of at Basin Disposal (Permit #NM-01-005) and any sludge or soil required to be removed to facilitate closure was hauled to Envirotech Land Farm (Permit #NM-01-011) and JFJ Landfarm % IEI (Permit #NM-01-0010B). The liner was cleaned per Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC was disposed of at the San Juan County Regional Landfill located on CR 3100.

4. BR Will receive prior approval to remove the below-grade tank and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves.

   The below-grade tank was disposed of in a division-approved manner.

5. If there is any on-site equipment associated with a below-grade tank, then BR shall remove the equipment, unless the equipment is required for some other purpose.

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

6. BR will test the soils beneath the below-grade tank to determine whether a release has occurred. COPC shall collect, at a minimum, a five point, composite sample; collect individual grab samples from any area that is wet, discolored or showing other evidence of a release; and analyzed for the constituents listed in Table I of 19.15.17.13 NMAC. COPC shall notify the division of its results on form C-141.

7. **A five point composite sample was taken of the below-grade tank using sampling tools and all samples tested per Subsection B of 19.15.17.1 3(B)(1)(b). (Sample results attached). Form C-141 is attached.**

Components	Tests Method	Limit (mg/kg)
Benzene	EPA SW-846 8021B or 8260B	0.2
BTEX	EPA SW-846 8021B or 8260B	50
TPH	EPA SW-846 418.1	100
Chlorides	EPA 300.1	250

8. If BR or the division determines that a release has occurred, then BR shall comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC, as appropriate.

   A release was not determined for the above referenced well.

9. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Table I of 19.15.17.13 NMAC, then BR shall backfill the excavation with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover; recontour and re-vegetate the site.

   The below-grade tank area passed all requirements of Paragraph (4) of Subsection E of 19.15.17.13 NMAC and was backfilled with compacted, non-waste containing, earthen material.

10. Notice of Closure will be given prior to closure to the Aztec Division office between 72 hours and one week via email or verbally. The notification of closure will include the following:
    i. Operator's name
    ii. Location by Unit Letter, Section, Township, and Range. Well name and API number.

    Notification is attached.

11. The surface owner shall be notified of BR's closing of the below-grade tank 72 hours, but not more than one week, prior to closure as per the approved closure plan via certified mail, return receipt requested.

    The closure process notification to the landowner was sent via email. (See Attached) (Well located on Federal Land, certified mail is not required for Federal Land per BLM/OCD MOU.)

12. Re-contouring of location will match fit, shape, line, form and texture of the surrounding. Re-shaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be place in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface, fitting the natural landscape.

    The below-grade tank area was re-contoured to match fit, shape, line, form and texture of the surrounding area. Re-shaping including drainage control, to prevent ponding and erosion. Natural drainages were unimpeded and water bars and/or silt traps were placed in areas where needed to prevent erosion on a large scale. Final recontour has a uniform appearance with smooth surface, fitting the natural landscape.

13. BR Shall seed the disturbed areas the first favorable growing season following closure of a below-grade tank. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM stipulated seed mixes will used on federally regulated lands and division-approved seed mixtures (administratively approved if required) will be utilized on all State or private lands. A uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre- disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds. If alternate seed mix is required by the state, private owner or tribe, it will be implemented with administrative

approval if needed. COPC will repeat seeding or planting will be continued until successful vegetative growth occurs.

Provision 13 was accomplished through complying with BLM seeding requirements as allowed by the BLM/OCD MOU.

14. A minimum of four feet of cover shall be achieved and the cover shall include one foot of suitable material, with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.

    The below-grade tank area was backfilled and more than four feet of cover was achieved and the cover included one foot of suitable material to establish vegetation at the site.

15. All closure activities will include proper documentation and be available for review upon request and will be submitted to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on C-144 and incorporate the following:
    - Soil Backfilling and Cover Installation **(See Report)**
    - Re-vegetation application rates and seeding techniques **(See Report)**
    - Photo documentation of the site reclamation **(Included as an attachment)**
    - Confirmation Sampling Results **(Included as an attachment)**
    - Proof of closure notice **(Included as an attachment)**

White, Arleen R

From:	Journey, Denise D
Sent:	Friday, June 26, 2015 7:11 AM
To:	'Smith, Cory, EMNRD'; Powell, Brandon, EMNRD
Cc:	Dumas, Lindsay; 'Kelly, Mark'; Munkres, Travis W; White, Arleen R; Notor, Lori
Subject:	Rhodes B 100 - BGT Closure 72-hour notification

Subject: RHODES B 100 – BGT REMOVAL

Anticipated Start Date: 6/29/15 @ 8:30AM

The subject well has a below-grade tank that will begin the closure process between 72 hours and one week from this notification. Please contact me at any time if you have any questions or concerns.

Well Name: RHODES B 100

API#: 30-045-29217

Location: Sec. 20, T28N, R11W

Footages: UL G (SWNE), 1770' FNL & 1850' FEL

Operator: BR **Surface Owner: BLM**

We have an approved Closure Plan and it is scanned on OCD online.

Denise Journey
Staff Regulatory Technician
ConocoPhillips Company
Denise.Journey@conocophillips.com
(505) 326-9556 office
(505) 215-1750 cell

10

July 20, 2015

Lindsay Dumas
ConocoPhillips
San Juan Business Unit
(505) 599-4089

Via electronic mail to: SJBUE-Team@ConocoPhillips.com

RE: Below Grade Tank Closure Report
Rhodes B #100
San Juan County, New Mexico

Dear Ms. Dumas:

Animas Environmental Services, LLC (AES) is pleased to provide the final report associated with the below grade tank (BGT) closure at ConocoPhillips (COPC) Rhodes B #100, located in San Juan County, New Mexico. Tank removal was completed by COPC contractors while AES was on site.

1.0 Site Information

1.1 Location

Site Name – Rhodes B #100
Legal Description – SW¼ NE¼, Section 20, T28N, R11W, San Juan County, New Mexico
Well Latitude/Longitude – N36.65010 and W108.02449, respectively
BGT Latitude/Longitude – N36.65039 and W108.02475, respectively
Land Jurisdiction – Bureau of Land Management (BLM)
Figure 1. Topographic Site Location Map
Figure 2. Aerial Site Map, June 2015

1.2 NMOCD Ranking

In accordance with the New Mexico Oil Conservation Division (NMOCD) *Guidelines for Remediation of Leaks, Spills, and Releases* (August 1993), the location was given a ranking score of 10 based on the following factors:

604 W. Piñon St.
Farmington, NM 87401
505-564-2281

1911 Main, Ste 280
Durango, CO 81301
970-403-3084

www.animasenvironmental.com

- **Depth to Groundwater:** A cathodic protection report form dated January 1996 reported the depth to groundwater as 240 feet below ground surface (bgs). (0 points)
- **Wellhead Protection Area:** The tank location is not within a wellhead protection area. (0 points)
- **Distance to Surface Water Body:** An unnamed wash which discharges to Horn Canyon wash and ultimately the San Juan River is located approximately 250 feet southeast of the location. (10 points)

1.3 BGT Closure Assessment

AES was initially contacted by Lindsay Dumas of COPC on June 11, 2015, and on June 29, 2015, Emilee Skyles of AES mobilized to the location. AES personnel collected one 5-point soil sample composited from four perimeter samples and one center sample of the BGT footprint from below the BGT liner.

2.0 Soil Sampling

On June 29, 2015, AES personnel conducted field sampling and collected one 5-point composite (SC-1) from below the BGT. Soil was collected from approximately 0.5 feet below the former BGT. Soil sample SC-1 was field screened for volatile organic compounds (VOCs), total petroleum hydrocarbon (TPH), and chloride, and was submitted for confirmation laboratory analysis. Soil sample locations are included on Figure 2.

2.1 Field Sampling

2.1.1 Volatile Organic Compounds

A portion of SC-1 was utilized for field screening of VOC vapors with a photo-ionization 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 sample SC-1 was also analyzed in the field for TPH per U.S. Environmental Protection Agency (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*.

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 USEPA Method 8021B;
- TPH per USEPA Method 418.1; and
- Chloride per USEPA Method 300.0.

2.3 Field and Laboratory Analytical Results

Field screening readings for VOCs via OVM were measured at 0.0 ppm in SC-1. Field TPH concentrations were reported at 32.0 mg/kg. The field chloride concentration was 180 mg/kg. Field sampling results are summarized in Table 1 and presented on Figure 2. The AES Field Sampling Report is attached.

Table 1. Soil Field VOCs, TPH, and Chloride Results
Rhodes B #100 BGT Closure, June 2015

Sample ID	*Date Sampled*	*Depth below BGT (ft)*	*VOCs OVM Reading (ppm)*	*Field TPH (mg/kg)*	*Field Chlorides (mg/kg)*
NMOCD Action Level (NMAC 19.15.17.13E)			*--*	***100***	***250***
SC-1	6/29/15	0.5	0.0	32.0	180

Laboratory analytical results reported benzene and total BTEX concentrations in SC-1 as less than 0.049 mg/kg and 0.245 mg/kg, respectively. TPH concentrations were reported at less than 20 mg/kg. The laboratory chloride concentration was reported at 260 mg/kg. Laboratory analytical results are summarized in Table 2 and included on Figure 2. The laboratory analytical report is attached.

Table 2. Soil Laboratory Analytical Results
Rhodes B #100 BGT Closure, June 2015

Sample ID	Date Sampled	Depth (ft)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH (mg/kg)	Chlorides (mg/kg)
	NMOCD Action Level (NMAC 19.15.17.13E)		0.2	50	100	250
SC-1	6/29/15	0.5	<0.049	<0.245	<20	**260**

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 in SC-1 were below the NMOCD action level of 100 mg/kg, with a concentration reported at 32.0 mg/kg. Benzene and total BTEX concentrations were below the NMOCD action levels of 0.2 mg/kg and 50 mg/kg, respectively. In contrast, chloride concentrations in SC-1 exceeded the NMOCD action level of 250 mg/kg with 260 mg/kg. As per Cory Smith of the NMOCD, no further work is recommended for the Rhodes B #100.

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

Sincerely,

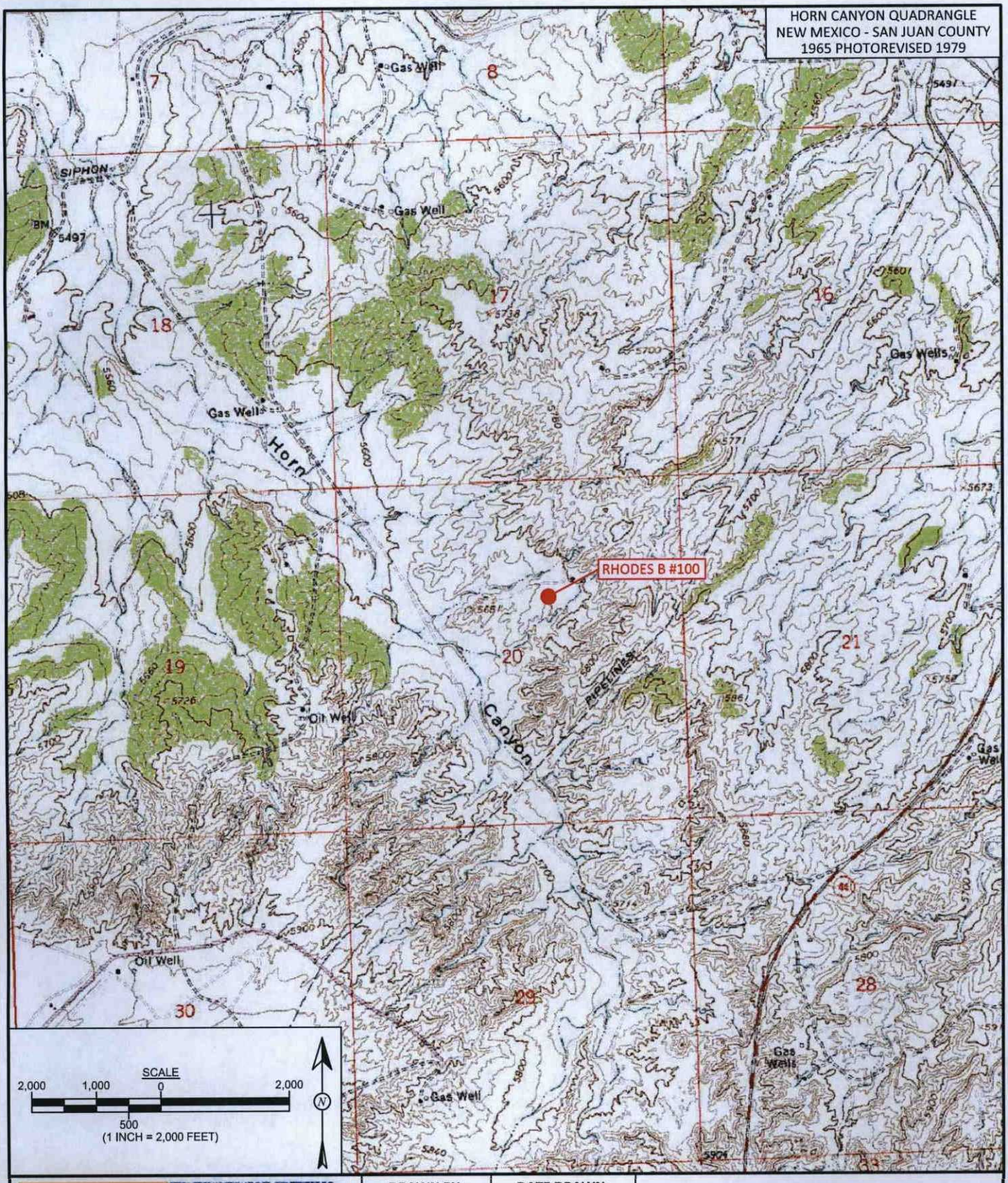
David J. Reese
Environmental Scientist

Elizabeth McNally, P.E.

Attachments:

Figure 1. Topographic Site Location Map
Figure 2. Aerial Site Map, June 2015
AES Field Sampling Report 062915
Hall Analytical Report 1506E15

R:\Animas 2000\Dropbox (Animas Environmental)\0000 Animas Server Dropbox EM\2015 Projects\ConocoPhillips\Rhodes B 100\COPC Rhodes B #100 BGT Closure Report 072015.docx



DRAWN BY: S. Glasses	**DATE DRAWN:** July 9, 2015
REVISIONS BY: C. Lameman	**DATE REVISED:** July 9, 2015
CHECKED BY: E. Skyles	**DATE CHECKED:** July 9, 2015
APPROVED BY: E. McNally	**DATE APPROVED:** July 9, 2015

Animas Environmental Services, LLC

FIGURE 1

TOPOGRAPHIC SITE LOCATION MAP

ConocoPhiliips
RHODES B #100
SW¼ NE¼, SECTION 20, T28N, R11W
SAN JUAN COUNTY, NEW MEXICO
N36.65010, W108.02449

Field Sampling Results

Sample ID	Date	Depth (ft)	OVM-PID (ppm)	TPH (mg/kg)	Chlorides (mg/kg)
NMOCD ACTION LEVEL			--	100	250
SC-1	6/29/15	0.5	0.0	32.0	180

SC-1 IS A 5-POINT COMPOSITE SAMPLE.

Laboratory Analytical Results

Sample ID	Date	Depth (ft)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH (mg/kg)	Chlorides (mg/kg)
NMOCD ACTION LEVEL			0.2	50	100	250
SC-1	6/29/15	0.5	<0.049	<0.245	<20	260

SAMPLE WAS ANALYZED PER USEPA METHOD 8021B, 418.1 AND 300.0.

Animas Environmental Services, LLC

DRAWN BY: S. Glasses	DATE DRAWN: July 9, 2015
REVISIONS BY: C. Lameman	DATE REVISED: July 9, 2015
CHECKED BY: E. Skyles	DATE CHECKED: July 9, 2015
APPROVED BY: E. McNally	DATE APPROVED: July 9, 2015

FIGURE 2

AERIAL SITE MAP
BELOW GRADE TANK CLOSURE
JUNE 2015
ConocoPhiliips
RHODES B #100
SW¼ NE¼, SECTION 20, T28N, R11W
SAN JUAN COUNTY, NEW MEXICO
N36.65010, W108.02449

AES Field Sampling Report

Animas Environmental Services, LLC

Client: ConocoPhillips

Project Location: Rhodes B #100

Date: 6/29/2015

Matrix: Soil

Sample ID	Collection Date	Collection Time	Sample Location	OVM (ppm)	Field Chloride (mg/kg)	Field TPH* (mg/kg)	Field TPH Analysis Time	TPH PQL (mg/kg)	DF	TPH Analysts Initials
SC-1	6/29/2015	9:34	Composite	0.0	180	32.0	9:53	20.0	1	EMS

DF Dilution Factor
NA Not Analyzed
PQL Practical Quantitation Limit
**Field TPH concentrations recorded may be below PQL.*

Field Chloride - Quantab Chloride Titrators or Drop Count Titration with Silver Nitrate
Total Petroleum Hydrocarbons - USEPA 418.1

Analyst: Emily Sy L

Report Finalized: 6/29/15

HALL ENVIRONMENTAL ANALYSIS LABORATORY

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

July 08, 2015

Emilee Skyles
Animas Environmental
604 Pinon Street
Farmington, NM 87401
TEL: (505) 564-2281
FAX

RE: CoP Rhodes B 100 OrderNo.: 1506E15

Dear Emilee Skyles:

Hall Environmental Analysis Laboratory received 1 sample(s) on 6/30/2015 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

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

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Analytical Report
Lab Order **1506E15**
Date Reported: **7/8/2015**

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Animas Environmental
Project: CoP Rhodes B 100
Lab ID: 1506E15-001 **Matrix:** SOIL

Client Sample ID: SC-1
Collection Date: 6/29/2015 9:34:00 AM
Received Date: 6/30/2015 7:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 418.1: TPH						Analyst: **TOM**	
Petroleum Hydrocarbons, TR	ND	20		mg/Kg	1	7/2/2015	20077
EPA METHOD 300.0: ANIONS						Analyst: **LGT**	
Chloride	260	30		mg/Kg	20	7/7/2015 11:03:37 PM	20131
EPA METHOD 8260B: VOLATILES SHORT LIST						Analyst: **RAA**	
Benzene	ND	0.049		mg/Kg	1	7/3/2015 7:15:47 AM	20032
Toluene	ND	0.049		mg/Kg	1	7/3/2015 7:15:47 AM	20032
Ethylbenzene	ND	0.049		mg/Kg	1	7/3/2015 7:15:47 AM	20032
Xylenes, Total	ND	0.098		mg/Kg	1	7/3/2015 7:15:47 AM	20032
Surr: 1,2-Dichloroethane-d4	101	70-130		%REC	1	7/3/2015 7:15:47 AM	20032
Surr: 4-Bromofluorobenzene	99.0	70-130		%REC	1	7/3/2015 7:15:47 AM	20032
Surr: Dibromofluoromethane	98.7	70-130		%REC	1	7/3/2015 7:15:47 AM	20032
Surr: Toluene-d8	94.8	70-130		%REC	1	7/3/2015 7:15:47 AM	20032

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

Qualifiers:

*	Value exceeds Maximum Contaminant Level.
E	Value above quantitation range
J	Analyte detected below quantitation limits
O	RSD is greater than RSDlimit
R	RPD outside accepted recovery limits
S	Spike Recovery outside accepted recovery limits
B	Analyte detected in the associated Method Blank
H	Holding times for preparation or analysis exceeded
ND	Not Detected at the Reporting Limit
P	Sample pH Not In Range
RL	Reporting Detection Limit

20

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1506E15**

08-Jul-15

Client: Animas Environmental

Project: CoP Rhodes B 100

Sample ID **MB-20131**	SampType: **mblk**	TestCode: **EPA Method 300.0: Anions**
Client ID: **PBS**	Batch ID: **20131**	RunNo: **27343**
Prep Date: **7/7/2015**	Analysis Date: **7/7/2015**	SeqNo: **819861** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID **LCS-20131**	SampType: **lcs**	TestCode: **EPA Method 300.0: Anions**
Client ID: **LCSS**	Batch ID: **20131**	RunNo: **27343**
Prep Date: **7/7/2015**	Analysis Date: **7/7/2015**	SeqNo: **819862** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	93.7	90	110			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
O	RSD is greater than RSDlimit	P	Sample pH Not In Range
R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
S	Spike Recovery outside accepted recovery limits		

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1506E15**

08-Jul-15

Client: Animas Environmental
Project: CoP Rhodes B 100

Sample ID **MB-20077**	SampType: **MBLK**	TestCode: **EPA Method 418.1: TPH**							
Client ID: **PBS**	Batch ID: **20077**	RunNo: **27259**							
Prep Date: **7/2/2015**	Analysis Date: **7/2/2015**	SeqNo: **816808**	Units: **mg/Kg**						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	ND	20								

Sample ID **LCS-20077**	SampType: **LCS**	TestCode: **EPA Method 418.1: TPH**							
Client ID: **LCSS**	Batch ID: **20077**	RunNo: **27259**							
Prep Date: **7/2/2015**	Analysis Date: **7/2/2015**	SeqNo: **816809**	Units: **mg/Kg**						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	100	20	100.0	0	99.6	86.7	126			

Sample ID **LCSD-20077**	SampType: **LCSD**	TestCode: **EPA Method 418.1: TPH**							
Client ID: **LCSS02**	Batch ID: **20077**	RunNo: **27259**							
Prep Date: **7/2/2015**	Analysis Date: **7/2/2015**	SeqNo: **816810**	Units: **mg/Kg**						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	100	20	100.0	0	102	86.7	126	2.73	20	

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH Not In Range
- RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1506E15**

08-Jul-15

Client: Animas Environmental

Project: CoP Rhodes B 100

Sample ID **lcs-20032**	SampType: **LCS**	TestCode: **EPA Method 8260B: Volatiles Short List**
Client ID: **LCSS**	Batch ID: **20032**	RunNo: **27296**
Prep Date: **6/30/2015**	Analysis Date: **7/2/2015**	SeqNo: **818016** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.99	0.050	1.000	0	99.5	70	130			
Toluene	1.0	0.050	1.000	0	102	70	130			
Ethylbenzene	1.0	0.050	1.000	0	103	70	130			
Xylenes, Total	3.1	0.10	3.000	0	104	70	130			
Surr: 1,2-Dichloroethane-d4	0.50		0.5000		99.0	70	130			
Surr: 4-Bromofluorobenzene	0.46		0.5000		92.7	70	130			
Surr: Dibromofluoromethane	0.53		0.5000		107	70	130			
Surr: Toluene-d8	0.48		0.5000		96.9	70	130			

Sample ID **mb-20032**	SampType: **MBLK**	TestCode: **EPA Method 8260B: Volatiles Short List**
Client ID: **PBS**	Batch ID: **20032**	RunNo: **27296**
Prep Date: **6/30/2015**	Analysis Date: **7/2/2015**	SeqNo: **818017** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.050								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 1,2-Dichloroethane-d4	0.50		0.5000		101	70	130			
Surr: 4-Bromofluorobenzene	0.50		0.5000		99.6	70	130			
Surr: Dibromofluoromethane	0.55		0.5000		109	70	130			
Surr: Toluene-d8	0.46		0.5000		92.9	70	130			

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH Not In Range
- RL Reporting Detection Limit

HALL ENVIRONMENTAL ANALYSIS LABORATORY
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: Animas Environmental | Work Order Number: 1506E15 | RcptNo: 1

Received by/date: LM 06/30/15

Logged By: Celina Sessa 6/30/2015 7:00:00 AM Celina Sessa

Completed By: Celina Sessa 6/30/2015 8:59:51 AM Celina Sessa

Reviewed By: CS/ 06/30/15

Chain of Custody

1. Custody seals intact on sample bottles?	Yes ☐	No ☐	Not Present ☑
2. Is Chain of Custody complete?	Yes ☑	No ☐	Not Present ☐
3. How was the sample delivered?	Courier		

Log In

4. Was an attempt made to cool the samples?	Yes ☑	No ☐	NA ☐
5. Were all samples received at a temperature of >0° C to 6.0°C	Yes ☑	No ☐	NA ☐
6. Sample(s) in proper container(s)?	Yes ☑	No ☐	
7. Sufficient sample volume for indicated test(s)?	Yes ☑	No ☐	
8. Are samples (except VOA and ONG) properly preserved?	Yes ☑	No ☐	
9. Was preservative added to bottles?	Yes ☐	No ☑	NA ☐
10. VOA vials have zero headspace?	Yes ☐	No ☐	No VOA Vials ☑
11. Were any sample containers received broken?	Yes ☐	No ☑	
12. Does paperwork match bottle labels? (Note discrepancies on chain of custody)	Yes ☑	No ☐	# of preserved bottles checked for pH: _____ (<2 or >12 unless noted)
13. Are matrices correctly identified on Chain of Custody?	Yes ☑	No ☐	Adjusted? _____
14. Is it clear what analyses were requested?	Yes ☑	No ☐	
15. Were all holding times able to be met? (If no, notify customer for authorization.)	Yes ☑	No ☐	Checked by: _____

Special Handling (if applicable)

16. 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: _____

17. Additional remarks:

18. Cooler Information

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	2.3	Good	Yes			

Chain-of-Custody Record

Client: Animas Environmental Services, LLC

Mailing Address: 604 W Pinon St.
Farmington, NM 87401

Phone #: 505-564-2281

Email or Fax#: eskyles@animasenvironmental.com

QA/QC Package:
X Standard ☐ Level 4 (Full Validation)

Accreditation:
☐ NELAP ☐ Other_____
☐ EDD (Type)_____

Turn-Around Time:
X Standard ☐ Rush_____

Project Name: CoP Rhodes B 100

Project #:

Project Manager: E. Skyles

Sampler: E. Skyles
On Ice: X Yes ☐ No
Sample Temperature: 3.3-1.0cf=2.3

HALL ENVIRONMENTAL ANALYSIS LABORATORY
www.hallenvironmental.com
4901 Hawkins NE - Albuquerque, NM 87109
Tel. 505-345-3975 Fax 505-345-4107

Analysis Request

Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No. 1506E15	BTEX - 8021B	TPH - 418.1	Chlorides - 300.0	Air Bubbles (Y or N)
6/29/15	9:34	Soil	SC-1	1 - 4 oz	cool	-001	X	X	X	

Date:	Time:	Relinquished by:	Received by:	Date	Time
6/29/15	1640			6/29/15	1646
Date:	Time:	Relinquished by:	Received by:	Date	Time
6/29/15	1754			6/30/15	0700

Remarks: Bill to Conoco Phillips
WO #: 103070382
USERID: KGARCIA
Area: 22
Dumas

Super: MUNKRTW
Act. Code: T110
Odered by: Lindsay

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.

HALL ENVIRONMENTAL ANALYSIS LABORATORY

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

July 08, 2015

Emilee Skyles
Animas Environmental
604 Pinon Street
Farmington, NM 87401
TEL: (505) 564-2281
FAX

RE: CoP Rhodes B 100 OrderNo.: 1506E15

Dear Emilee Skyles:

Hall Environmental Analysis Laboratory received 1 sample(s) on 6/30/2015 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

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

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Analytical Report
Lab Order **1506E15**
Date Reported: **7/8/2015**

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Animas Environmental
Client Sample ID: SC-1
Project: CoP Rhodes B 100
Collection Date: 6/29/2015 9:34:00 AM
Lab ID: 1506E15-001
Matrix: SOIL
Received Date: 6/30/2015 7:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 418.1: TPH						Analyst: **TOM**	
Petroleum Hydrocarbons, TR	ND	20		mg/Kg	1	7/2/2015	20077
EPA METHOD 300.0: ANIONS						Analyst: **LGT**	
Chloride	260	30		mg/Kg	20	7/7/2015 11:03:37 PM	20131
EPA METHOD 8260B: VOLATILES SHORT LIST						Analyst: **RAA**	
Benzene	ND	0.049		mg/Kg	1	7/3/2015 7:15:47 AM	20032
Toluene	ND	0.049		mg/Kg	1	7/3/2015 7:15:47 AM	20032
Ethylbenzene	ND	0.049		mg/Kg	1	7/3/2015 7:15:47 AM	20032
Xylenes, Total	ND	0.098		mg/Kg	1	7/3/2015 7:15:47 AM	20032
Surr: 1,2-Dichloroethane-d4	101	70-130		%REC	1	7/3/2015 7:15:47 AM	20032
Surr: 4-Bromofluorobenzene	99.0	70-130		%REC	1	7/3/2015 7:15:47 AM	20032
Surr: Dibromofluoromethane	98.7	70-130		%REC	1	7/3/2015 7:15:47 AM	20032
Surr: Toluene-d8	94.8	70-130		%REC	1	7/3/2015 7:15:47 AM	20032

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

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
O	RSD is greater than RSDlimit	P	Sample pH Not In Range
R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
S	Spike Recovery outside accepted recovery limits		

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1506E15**

08-Jul-15

Client: Animas Environmental

Project: CoP Rhodes B 100

Sample ID	**MB-20131**	SampType:	**mblk**		TestCode:	**EPA Method 300.0: Anions**				
Client ID:	**PBS**	Batch ID:	**20131**		RunNo:	**27343**				
Prep Date:	**7/7/2015**	Analysis Date:	**7/7/2015**		SeqNo:	**819861**	Units:	**mg/Kg**		

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	**LCS-20131**	SampType:	**lcs**		TestCode:	**EPA Method 300.0: Anions**				
Client ID:	**LCSS**	Batch ID:	**20131**		RunNo:	**27343**				
Prep Date:	**7/7/2015**	Analysis Date:	**7/7/2015**		SeqNo:	**819862**	Units:	**mg/Kg**		

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	93.7	90	110			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
O	RSD is greater than RSDlimit	P	Sample pH Not In Range
R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
S	Spike Recovery outside accepted recovery limits		

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1506E15**

08-Jul-15

Client: Animas Environmental

Project: CoP Rhodes B 100

Sample ID **MB-20077**	SampType: **MBLK**	TestCode: **EPA Method 418.1: TPH**
Client ID: **PBS**	Batch ID: **20077**	RunNo: **27259**
Prep Date: **7/2/2015**	Analysis Date: **7/2/2015**	SeqNo: **816808** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	ND	20								

Sample ID **LCS-20077**	SampType: **LCS**	TestCode: **EPA Method 418.1: TPH**
Client ID: **LCSS**	Batch ID: **20077**	RunNo: **27259**
Prep Date: **7/2/2015**	Analysis Date: **7/2/2015**	SeqNo: **816809** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	100	20	100.0	0	99.6	86.7	126			

Sample ID **LCSD-20077**	SampType: **LCSD**	TestCode: **EPA Method 418.1: TPH**
Client ID: **LCSS02**	Batch ID: **20077**	RunNo: **27259**
Prep Date: **7/2/2015**	Analysis Date: **7/2/2015**	SeqNo: **816810** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	100	20	100.0	0	102	86.7	126	2.73	20	

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH Not In Range
- RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1506E15**

08-Jul-15

Client: Animas Environmental

Project: CoP Rhodes B 100

Sample ID **lcs-20032**	SampType: **LCS**	TestCode: **EPA Method 8260B: Volatiles Short List**
Client ID: **LCSS**	Batch ID: **20032**	RunNo: **27296**
Prep Date: **6/30/2015**	Analysis Date: **7/2/2015**	SeqNo: **818016** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.99	0.050	1.000	0	99.5	70	130			
Toluene	1.0	0.050	1.000	0	102	70	130			
Ethylbenzene	1.0	0.050	1.000	0	103	70	130			
Xylenes, Total	3.1	0.10	3.000	0	104	70	130			
Surr: 1,2-Dichloroethane-d4	0.50		0.5000		99.0	70	130			
Surr: 4-Bromofluorobenzene	0.46		0.5000		92.7	70	130			
Surr: Dibromofluoromethane	0.53		0.5000		107	70	130			
Surr: Toluene-d8	0.48		0.5000		96.9	70	130			

Sample ID **mb-20032**	SampType: **MBLK**	TestCode: **EPA Method 8260B: Volatiles Short List**
Client ID: **PBS**	Batch ID: **20032**	RunNo: **27296**
Prep Date: **6/30/2015**	Analysis Date: **7/2/2015**	SeqNo: **818017** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.050								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 1,2-Dichloroethane-d4	0.50		0.5000		101	70	130			
Surr: 4-Bromofluorobenzene	0.50		0.5000		99.6	70	130			
Surr: Dibromofluoromethane	0.55		0.5000		109	70	130			
Surr: Toluene-d8	0.46		0.5000		92.9	70	130			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
O	RSD is greater than RSDlimit	P	Sample pH Not In Range
R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
S	Spike Recovery outside accepted recovery limits		

HALL ENVIRONMENTAL ANALYSIS LABORATORY
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: Animas Environmental Work Order Number: 1506E15 RcptNo: 1

Received by/date: LM 06/30/15
Logged By: Celina Sessa 6/30/2015 7:00:00 AM Celina Sessa
Completed By: Celina Sessa 6/30/2015 8:59:51 AM Celina Sessa
Reviewed By: CS/JA 06/30/15

Chain of Custody

1. Custody seals intact on sample bottles?	Yes ☐	No ☐	Not Present ☑
2. Is Chain of Custody complete?	Yes ☑	No ☐	Not Present ☐
3. How was the sample delivered?	Courier		

Log In

4. Was an attempt made to cool the samples?	Yes ☑	No ☐	NA ☐
5. Were all samples received at a temperature of >0° C to 6.0°C	Yes ☑	No ☐	NA ☐
6. Sample(s) in proper container(s)?	Yes ☑	No ☐	
7. Sufficient sample volume for indicated test(s)?	Yes ☑	No ☐	
8. Are samples (except VOA and ONG) properly preserved?	Yes ☑	No ☐	
9. Was preservative added to bottles?	Yes ☐	No ☑	NA ☐
10. VOA vials have zero headspace?	Yes ☐	No ☐	No VOA Vials ☑
11. Were any sample containers received broken?	Yes ☐	No ☑	
12. Does paperwork match bottle labels? (Note discrepancies on chain of custody)	Yes ☑	No ☐	# of preserved bottles checked for pH: (<2 or >12 unless noted)
13. Are matrices correctly identified on Chain of Custody?	Yes ☑	No ☐	Adjusted?
14. Is it clear what analyses were requested?	Yes ☑	No ☐	
15. Were all holding times able to be met? (If no, notify customer for authorization.)	Yes ☑	No ☐	Checked by:

Special Handling (if applicable)

16. 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:

17. Additional remarks:

18. Cooler Information

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	2.3	Good	Yes			

Chain-of-Custody Record

Client: Animas Environmental Services, LLC

Mailing Address: 604 W Pinon St.
Farmington, NM 87401

Phone #: 505-564-2281

Email or Fax#: eskyles@animasenvironmental.com

QA/QC Package:
X Standard ☐ Level 4 (Full Validation)

Accreditation:
☐ NELAP ☐ Other_____
☐ EDD (Type) _____

Turn-Around Time:
X Standard ☐ Rush_____

Project Name:
CoP Rhodes B 100

Project #:

Project Manager:
E. Skyles

Sampler: E. Skyles
On Ice: X Yes ☐ No
Sample Temperature: 3.3-1.0cf-2.3

HALL ENVIRONMENTAL ANALYSIS LABORATORY
www.hallenvironmental.com
4901 Hawkins NE - Albuquerque, NM 87109
Tel. 505-345-3975 Fax 505-345-4107

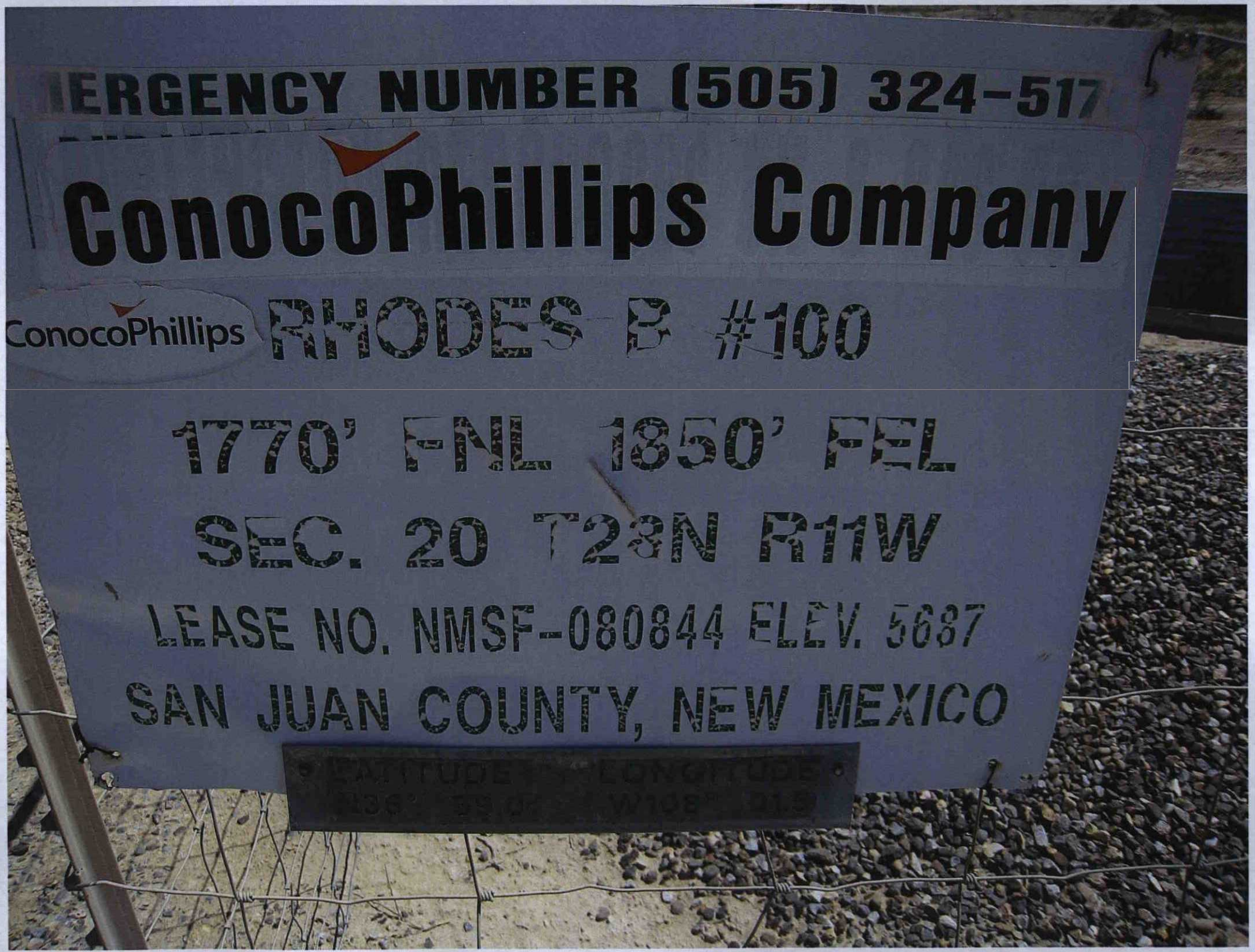
Analysis Request

Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No. 1506E15	BTEX - 8021B	TPH - 418.1	Chlorides - 300.0	Air Bubbles (Y or N)
6/29/15	9:34	Soil	SC-1	1 - 4 oz	cool	—001	X	X	X	

Date:	Time:	Relinquished by:	Received by:	Date	Time
6/29/15	1640			6/29/15	1646
6/29/15	1754			6/30/15	0700

Remarks: Bill to Conoco Phillips
WO #: 103070382
USERID: KGARCIA
Area: 22
Dumas

Super: MUNKRTW
Act. Code: T110
Odered by: Lindsay


ERGENCY NUMBER (505) 324-517
ConocoPhillips Company
ConocoPhillips
RHODES B #100
1770' FNL 1850' FEL
SEC. 20 T23N R11W
LEASE NO. NMSF-080844 ELEV. 5687
SAN JUAN COUNTY, NEW MEXICO