

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, 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, closed-loop systems, and below-grade tanks, submit to the appropriate NMOCD District Office.
For permanent pits and exceptions submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

16096

Pit, Closed-Loop System, Below-Grade Tank, or
Proposed Alternative Method Permit or Closure Plan Application

- Type of action: Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method
 Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method
 Modification to an existing permit
 Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system, below-grade tank, or proposed alternative method

Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, 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: Chevron Midcontinent, LP OGRID #: 241333
Address: Post Office Box 36366, Houston, TX 77236
Facility or well name: Riggs No 2
API Number: 30-045-29118 OCD Permit Number: _____
U/L or Qtr/Qtr Qtr/Qtr N Section 4 Township 29N Range 12W County: San Juan
Center of Proposed Design: Latitude 36.751893° Longitude -108.107209° NAD: 1927 1983
Surface Owner: Federal State Private Tribal Trust or Indian Allotment

2.
 Pit: Subsection F or G of 19.15.17.11 NMAC
Temporary: Drilling Workover
 Permanent Emergency Cavitation P&A
 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.
 Closed-loop System: Subsection H of 19.15.17.11 NMAC
Type of Operation: P&A Drilling a new well Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)
 Drying Pad Above Ground Steel Tanks Haul-off Bins Other _____
 Lined Unlined Liner type: Thickness _____ mil LLDPE HDPE PVC Other _____
Liner Seams: Welded Factory Other _____

4.
 Below-grade tank: Subsection I of 19.15.17.11 NMAC
Volume: 95 bbl Type of fluid: Produced Water
Tank Construction material: Steel
 Secondary containment with leak detection Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
 Visible sidewalls and liner Visible sidewalls only Other Buried
Liner type: Thickness _____ mil HDPE PVC Other None

5.
 Alternative Method:
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

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6.
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

7.
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)

8.
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 19.15.3.103 NMAC

9.
Administrative Approvals 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:
 Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval.
 Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

10.
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. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.

Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No
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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (Applies to temporary, emergency, or cavitation pits and below-grade tanks) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (Applies to permanent pits) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> No

11. **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: _____

12. **Closed-loop Systems 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.

- Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9
- Siting Criteria Compliance Demonstrations (only for on-site closure) - 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: _____
- Previously Approved Operating and Maintenance Plan API Number: _____ (Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)

13. **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 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

14. **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 Closed-loop System
 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 (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

15. **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 F 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 I of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

16.

Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only: (19.15.17.13.D NMAC)

Instructions: Please identify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *will not* be used for future service and operations?

Yes (If yes, please provide the information below) No

Required for impacted areas which will not be used for future service and operations:

- 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 I of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

17.

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 may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.

- | | |
|---|---|
| Ground water is less than 50 feet below the bottom of the buried waste.
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | <input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> NA |
| Ground water is between 50 and 100 feet below the bottom of the buried waste
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | <input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> 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 | <input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> NA |
| 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 | <input type="checkbox"/> Yes <input type="checkbox"/> 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 | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.
- NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> 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 | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within 500 feet of a wetland.
- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within the area overlying a subsurface mine.
- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within an unstable area.
- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within a 100-year floodplain.
- FEMA map | <input type="checkbox"/> Yes <input type="checkbox"/> No |

18.

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 F of 19.15.17.13 NMAC
- Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements 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 Subsection F of 19.15.17.13 NMAC
- Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F 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 I of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

19.

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: _____

20.

OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)

OCD Representative Signature: [Signature] Approval Date: 10/26/17

Title: Environmental Spec. OCD Permit Number: _____

21.

Closure Report (required within 60 days of closure completion): Subsection K of 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: _____

22.

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.

23.

Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:

Instructions: Please identify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Were the closed-loop system operations and associated activities performed on or in areas that will not be used for future service and operations?

Yes (If yes, please demonstrate compliance to the items below) No

Required for impacted areas which will not be used for future service and operations:

- Site Reclamation (Photo Documentation)
- Soil Backfilling and Cover Installation
- Re-vegetation Application Rates and Seeding Technique

24.

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) **See Attached**
- Proof of Deed Notice (required for on-site closure) **Not Required**
- Plot Plan (for on-site closures and temporary pits) **Not Required**
- Confirmation Sampling Analytical Results (if applicable) **See Attached**
- Waste Material Sampling Analytical Results (required for on-site closure) **Not Required**
- Disposal Facility Name and Permit Number **Envirotech's Landfarm #2, Permit #: NM-01-001**
- Soil Backfilling and Cover Installation **See Attached**
- Re-vegetation Application Rates and Seeding Technique **Pursuant to the BLM MOU and Approved Closure Plan**
- Site Reclamation (Photo Documentation) **See Attached**

On-site Closure Location: Latitude _____ Longitude _____ NAD: 1927 1983

25.

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): Mr. Isaac Reyes Title: Facilities Engineer

Signature: Isaac Reyes Date: 10/19/2017

e-mail address: isaacreves@chevron.com Telephone: (505)333-1929

BELOW GRADE TANK (BGT) CLOSURE PLAN

SITE NAME:

**RIGGS #2 WELL SITE
UNIT LETTER N, SECTION 4, TOWNSHIP 29 NORTH, RANGE 12 WEST
SAN JUAN, NEW MEXICO
LATITUDE: N36.751893⁰ LONGITUDE: W108.107209⁰**

SUBMITTED TO:

**MR. CORY SMITH / MS. VANESSA FIELDS
NEW MEXICO OIL CONSERVATION DIVISION
1000 RIO BRAZOS ROAD
AZTEC, NM 87410 PHONE (505) 334-6178**

SUBMITTED BY:

**MR. ISAAC REYES
CHEVRON NORTH AMERICA
POST OFFICE BOX 370
AZTEC, NEW MEXICO 87410
OFFICE: (505) 333-1929
CELL: (505) 386-8610**

**INITIALLY SUBMITTED WITH BGT PERMIT
MARCH 2010**



October 20, 2017

Project Number 92270-1653

Mr. Cory Smith / Ms. Vanessa Fields
New Mexico Oil Conservation Division
1000 Rio Brazos Road
Aztec, NM 87410

Phone (505) 334-6178

**RE: BELOW-GRADE TANK CLOSURE DOCUMENTATION FOR THE RIGGS #2 WELL
SITE, SAN JUAN COUNTY, NEW MEXICO**

Dear Mr. Smith / Ms. Fields:

On behalf of Chevron, North America, please find enclosed the Below Grade Tank (BGT) Closure Plan, Form C-144 and required documents for BGT closure activities conducted at the Riggs #2 well site located in Section 4, Township 29 North, Range 12 West, San Juan County, New Mexico.

This report details results at or below the regulatory limits for all constituents analyzed, confirming a release had not occurred; see attached *Analytical Results*. Envirotech, Inc. recommends *No Further Action* in regards to this incident.

We appreciate the opportunity to be of service. If you have any questions or require additional information, please contact our office at (505) 632-0615.

Respectfully Submitted,
ENVIROTECH, INC.

A handwritten signature in black ink, appearing to read 'Felipe Aragon', written over a horizontal line.

Felipe Aragon, CES
Environmental Assistant Manager
faragon@envirotech-inc.com

Enclosures: *Below Grade Tank Closure Plan
Form C-144 and Required Documents*

Email Cc: Mr. Isaac Reyes – Chevron NA

**BELOW GRADE TANK (BGT) CLOSURE PLAN
CHEVRON NORTH AMERICA
RIGGS #2 WELL SITE
SAN JUAN, NEW MEXICO**

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INTRODUCTION

Chevron North America would like to submit a closure plan for the below grade tank (BGT) at the Riggs #2 well site located in the NE ¼ NE ¼ of Section 4, Township 29 North, Range 12 West, San Juan County, New Mexico. This closure plan has been prepared in conformance with New Mexico Oil Conservation Division (NMOCD) procedures.

SCOPE OF CLOSURE ACTIVITIES

The purpose of this closure plan is to provide the details of activities involved in the closure of the BGT at the Riggs #2 well site. The following scope of closure activities has been designed to meet this objective:

- 1) Chevron North America shall submit a closure plan to the division's environmental bureau. Upon receipt of this plan the division shall review the current closure plan for adequacy and accordance with 19.15.17.9 Subsection C NMAC and 19.15.17.13 NMAC.
 - a. Closure Plan was submitted on March 4, 2010, to the division's environmental bureau, in accordance with 19.15.17.9 Subsection C NMAC and 19.15.17.13 NMAC. The closure plan was approved on August 7, 2017, by Mr. Randy Bayliss of the NMOCD, Santa Fe Office.
- 2) No less than 72 hours and no greater than one (1) week prior to BGT removal, Chevron North America will provide written notification to the appropriate division district office, as in accordance with 19.15.17.13 Subsection J Paragraph (2) NMAC.
 - a. Please find attached the written notification to the district office sent on August 15, 2017.
- 3) Chevron North America shall provide written notification to the surface owner no later than 24 hours prior to BGT removal. Animas Valley Land and Water Co. LLC will receive notification, as in accordance with 19.15.17.13 Subsection J Paragraph (1) NMAC.
 - a. A Notice of intent was sent via certified mail to the surface owner on August 8, 2017.
- 4) Chevron North America, or a contractor acting on behalf of Chevron, will remove all liquids, and/or sludge, if applicable, prior to closure. Material will be disposed of at Envirotech's Landfarm, Permit # NM-01-0011, as in accordance with 19.15.17.13 Subsection E Paragraph (1) NMAC.
 - a. All waste material was removed from the BGT by Riley Industrial Services and transported to Envirotech's NMOCD permitted Landfarm #2 as listed above; see attached Bill of Lading.
- 5) Chevron North America, or a contractor acting on behalf of Chevron, will remove the BGT and all on-site equipment associated with the BGT that cannot or will not be reused on-site, as in accordance with 19.15.17.13 Subsection E Paragraphs (2) and (3) NMAC.
 - a. Chevron has removed the BGT and associated equipment that will not be reused onsite; see attached Site Photography.

- 6) Once the BGT is removed, a five (5)-point composite sample will be collected from directly below the tank or below the leak detection system if present. An additional discrete sample will be collected from any area that is wet, discolored, or showing other evidence of a release. All samples being collected will be analyzed for benzene and total BTEX using USEPA Method 8021, TPH using USEPA Method 418.1, and chlorides using USEPA Method 300.1, as in accordance with 19.15.17.13 Subsection E Paragraph (4) NMAC.

Sample ID	TPH (418.1)	Benzene	BTEX	Total Chlorides
BGT Comp	156 mg/Kg	<0.10 mg/Kg	<0.10 Mg/kg	<20.0 mg/Kg

- 7) Depending on soil sample results, the area will be either backfilled or the area will be excavated.
- a. If soil samples pass the regulatory standards of 0.2 ppm benzene, 50 ppm BTEX, 100 ppm TPH, and 250 ppm or background concentration of chlorides, as in accordance with 19.15.17.13 Subsection E Paragraph (4) NMAC.
 - i. Chevron North America, or a contractor acting on behalf of Chevron, will backfill the excavation or impacted area with non-waste containing, earthen material, in accordance with 19.15.17.13 Subsection E Paragraph (6) NMAC.
 1. BGT pit was backfilled with clean earthen material in accordance with 19.15.17.13 Subsection E Paragraph (6) NMAC.
 - ii. Upon decommissioning of the well site Chevron North America, or a contractor acting on behalf of Chevron, will construct a divison-prescribed soil cover, substantially restore, recontour and re-vegetate the site, in accordance with 19.15.17.13 Subsections G, H, and I NMAC.
 1. Well site has been decommissioned – re-vegetation will occur on the well site.
 - b. If soil samples exceed the regulatory standards stated above.
 - i. Chevron North America will submit a Release Notification by Form C-141 to the appropriate division district office, in accordance with 19.15.17.13 Subsection E Paragraph (4) NMAC.
 1. C-141 release notification form is attached.
 - ii. Activities beyond this point will be in accordance with 19.15.3.116 NMAC and 19.15.11.19 NMAC.
 1. Upon Envirotech’s arrival, the closure standard for the site was determined to be 1000 ppm TPH and 100 ppm organic vapors in accordance with the New Mexico Oil Conservation Division (NMOCD) Guidelines for the Remediation of Leaks, Spills, and Releases. Therefore, no remedial action was taken.

REPORTING

Reporting will occur within 60 days following the BGT closure and will consist of a form C-144 with all supporting data, and a form C-141 with all supporting data, if necessary. The supporting data will include analytical results, a site diagram, and other information related to the onsite activities.

We appreciate the opportunity to be of service. If you have any questions or require further information, please do not hesitate to contact our office at (505) 632-0615.

Respectfully Submitted:

Chevron North America

Isaac Reyes

Isaac Reyes
Chevron North America
Exploration & Production Company

From: [Reyes, Isaac](#)
To: [Smith, Cory, EMNRD](#)
Subject: RE: BGT Removal: Riggs 2

Cory,

This is a follow-up courtesy notice to let you know we will be pulling this pit tank tomorrow 8/16 at 11AM. Landowner notice was sent out on 8/9 and the closure plan was approved by Randy Bayliss on 8/7.

Isaac

-----Original Message-----

From: Reyes, Isaac
Sent: Monday, August 07, 2017 7:57 AM
To: 'Smith, Cory, EMNRD' <Cory.Smith@state.nm.us>
Subject: RE: BGT Removal: Riggs 2

Cory,

See below the legal information for this well. With respect to the Closure Plan, our records indicate the BGT Permit and Closure Plan were submitted to the NMOCD office in Santa Fe ("Box 2") in 2010 but were never approved. I have attached the C-144 and closure plan we submitted at that time. Is it still necessary to update the plan to reflect the 2012 rules if the original permit application was submitted prior to the rule change?

Well name /Number	API	Lease number	FTG N/S	FTG E/W	QTR/QTR	SEC	TWN	RNG
LAT LONG								
RIGGS #2	30-045-29118	NMNM014375	1175 S	1640 W	SE/SW		-4	-29N
-12W 36.751893	-108.107209							

Isaac

-----Original Message-----

From: Smith, Cory, EMNRD [<mailto:Cory.Smith@state.nm.us>]
Sent: Friday, August 04, 2017 3:58 PM
To: Reyes, Isaac <isaacreyes@chevron.com>
Cc: Elworthy, Douglas <DElworthy@chevron.com>; Fields, Vanessa, EMNRD <Vanessa.Fields@state.nm.us>
Subject: [**EXTERNAL**] RE: BGT Removal: Riggs 2

Isaac,

If the BGT is Being closed due to P&A please include all of the required information for the Closure Notification. 19.15.17.13. NMAC

Does Chevron have an approved closure plan for the BGT? If not prior to closure(Monday) Chevron needs to submit one and have it approved.

If you have any questions please give me a call.

Cory Smith
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410

(505)334-6178 ext 115
cory.smith@state.nm.us

-----Original Message-----

From: Reyes, Isaac [<mailto:isaacreyes@chevron.com>]
Sent: Friday, August 4, 2017 1:28 PM
To: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Cc: Elworthy, Douglas <DElworthy@chevron.com>
Subject: BGT Removal: Riggs 2

Cory,

This is a courtesy notice to let you know we'll be removing the BGT on the Riggs 2 location in advance of final reclamation. Landowners are aware of the work planned. We will be pulling the tank on Monday August 7 around 1pm.

Best,
Isaac Reyes



*Greg P Davis
Contract Landman
gpda@chevron.com*

Certified mail:

August 8, 2017

Randel Lewis, Receiver
1600 Wynkoop St. | Ste. 200
Denver, CO 80202

ANIMAS VALLEY LAND AND WATER CO LLC (R0051776)
P O BOX 5520
FARMINGTON NM 87499-5520

ATTN: Randy Lewis

**Re: RIGGS #2 WELL
API #3004529118
Sec 4, T29N R12W
San Juan Co, NM**

Gentlemen:

Four Star has plugged the above referenced well and has started reclamation of the well-pad and a portion of the access road into the well location. In addition, we need to remove the **Below-Grade Tank** on the P&A'd Riggs #2 well pad. We are notifying you of our schedule prior to removal. We plan to do this work next Monday (8/14/2017).

In accordance with NMAC § 19.15.17.13(J)(1), Chevron is notifying the surface owner by certified mail, return receipt requested, of its plans to close a BGT prior to beginning closure activities.

Should you have any questions or concerns with this reclamation project, please contact Isaac Reyes, Facility Engineer, 505-333-1929, isaacreyes@chevron.com.

Sincerely,

Greg Davis
Contract Landman
Four Star Oil & Gas Company

ANIMAS VALLEY LAND AND WATER CO LLC

By: _____

Dated: _____



332 Road 3100
Aztec, New Mexico 87410
Tel: 505-333-1941
Cell: 505-386-8074
Fax: 505-334-7134

Reclamation and Closure Plan

Four Star Oil & Gas Company
Lease # NMNM014375
Riggs #2
Section 4, T29N, R12W, N.M.P.M.

Submitted to
Landowners

April 10, 2017

Prepared by

Four Star Oil & Gas Company
Attn: Isaac Reyes, Facility Engineer
332 Road 3100, Aztec, New Mexico 87410

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1.0 ADMINSTRATIVE INFORMATION

Operator: Four Star Oil & Gas Company
332 Road 3100
Aztec, New Mexico 87410

Contact: April E. Pohl
Permitting Specialist
Four Star Oil & Gas Company
332 Road 3100
Aztec, New Mexico 87410
Office: (505) 333-1941
Cell: (505) 386-8074

1.1 Well Information

Operator of Record: Four Star Oil & Gas Company
State Operator OGRID Number: 131994
Well Name: Riggs 2
Federal Lease: NMNM014375
API # 30-045-29118
Well Status: Plugged & Abandoned. **Effective Date:** By end of year 2017

1.2 Location Information

Location: Section 4, Township 29 North, Range 12 West
Latitude/Longitude: 36.751893 /-108.107209

2.0 PURPOSE AND SCOPE

The purpose of this Reclamation Plan is to ensure final reclamation of Four Star Oil & Gas Company's (Four Star) Riggs #2 well pad site and associated access road in San Juan County, New Mexico. The plan will use Chapter 6 of the "Gold Book" procedures as a guideline and be based upon the Four Star on-site inspection conducted on January 16, 2017.

This plan has been developed using as guidelines the Farmington Field Office Resource Management Plan and Bureau of Land Management Reclamation Policy. This plan addresses the following Reclamation Policy Requirements:

- Waste Material Handling and Disposal
- Subsurface Integrity
- Surface Reconstruction and Stabilization
- Re-establishing Surface Hydrology
- Site Preparation
- Re-Vegetation
- Visual Resources

3.0 RECLAMATION STATEMENT OF RESPONSIBILITY

Four Star assumes primary responsibility for the reclamation of all surface disturbances attributable to the pad containing the Riggs #2 well site. All areas that have been disturbed at the subject site will be reclaimed to a safe and stable condition in coordination with the landowner.

4.0 PROPOSED RECLAMATION PLAN

NOTE: NO disturbance will occur outside the areas currently disturbed by the access road boundaries.

Four Star will comply with the requirements in accordance with the approved Sundry Notice associated with this submittal. The exact date of this has not been confirmed, but will occur within 6 months of plugging the well. Components of the plan include:

- Reclamation to be completed within 6 months of plugging date
- Remove fence surrounding location
- Underground production piping to be flushed, purged, and cut and capped below grade
- Remove all rig anchors on the location if present
- Clean and remove all surface equipment (separator, pumping unit, pit tank, meter run)
- Remove any gravel on well pad surface
- Construct/install water and runoff control measures where appropriate, including water bars, silt traps, straw wattles, etc.
- Remove undesirable vegetation from pad (noxious weeds)
- Pad will not be returned to original contours in accordance with landowner preference
- After gravel has been removed, the below grade tank excavation filled, and the undesired vegetation removed, rip, disk and seed the location with a disk type seed drill.
- Install a berm/fence on the access roads to prevent travel on the reclaimed location.
- Install a sign on fence, i.e. Seeded Area -- Do Not Disturb.

4.1 Waste Material Handling and Disposal

All remaining surface equipment and trash, if any, will be removed from the location and disposed of at an approved waste disposal facility. All miscellaneous trash and debris will be removed and disposed of at a local waste disposal facility. If contaminated soil is discovered during the reclamation of this well location, Four Star will follow NTL 93-1 "Guidelines for Unlined Surface Impoundments Closure" for testing requirements and allowable threshold limits. Specific waste removal for this well includes:

TRASH: Remove leftover trash/debris associated with previous work on the location (i.e. gravel, debris, scrap metal, etc.)

SURFACE EQUIPMENT: Remove all surface equipment on location. Equipment to be removed includes pumping unit, production separator, pit tank, and meter run.

SUBSURFACE EQUIPMENT: Purge, flush, cut and cap below-grade pipelines on location at depth of at least 30".

4.2 Surface Reconstruction and Stabilization

The long term objective of final reclamation is to set the course for eventual ecosystem restoration including the restoration of natural vegetation. Four Star will avoid disturbance to the mature vegetation that has become well established on the pad to the extent practicable, and would focus reclamation efforts toward establishing stormwater management and re-vegetating the abandoned well pad and associated access roads.

Undesired vegetation will be brush hogged and removed from the pad.

4.2.1 Well Pad Reclamation

As mentioned previously, all equipment, material, debris and site trash will be removed from the location. Four Star's plan for final reclamation of the well pad surface is described below. The area in scope for the work associated with this reclamation includes the original pad for the Riggs #2 well site and the section of the access road constructed specifically for access to the Riggs #2. *(Note: some steps may occur in a different sequence than listed below or may occur simultaneously as the case may be):*

1. The following activities would take place before commencing with any dirt work to restore the pad surface:
 - The landowner would be notified at least 48 hours prior to construction;
 - Pre-construction conditions would be documented and pictures would be taken from the four cardinal directions for future reference;
 - Temporary and/or permanent stormwater and erosion control Best Management Practices (BMPs) would be employed at appropriate locations around the pad as dictated by local drainage patterns and expected areas of disturbance and slopes AND across the roads. BMP selection would be determined by local factors and would be a combination of sediment and erosions controls that are deemed effective and low maintenance. Straw wattles, diversion ditches, mulch, soil

blankets, and/or other suitable BMPs may be used in various combinations, as appropriate, during and after construction activities. All temporary measures will be maintained and if necessary, removed prior to submitting a Final Abandonment Notice (FAN) for approval. Diversion ditches and silt traps will be utilized to divert stormwater around the pad, preventing the stormwater from affecting seeding;

- Remove all gravel on well pad surface. Gravel may be used to fill in eroded areas;
- Those areas where healthy, mature, and weed-free vegetation has established along the pad perimeter would remain undisturbed to the extent possible;
- All disturbed areas would be re-seeded in accordance with current industry BMPs. Drill seeding will follow the contour of the slope and under no circumstances will seed be drilled up and down the contours. See Section 4.5 Re-vegetation for additional details on seed bed preparation, planting methods and timing.

4.2.2 Access Road Reclamation

Established vegetation along the roadsides will remain undisturbed where possible to encourage native plant growth onto the new disturbance and to maintain erosion and sediment control. Straw wattles and/or diversion ditches will be placed at appropriate locations along the road as needed to prevent sediment transport to local drainages. Other suitable BMPs may be used in various combinations, as appropriate, during and after construction activities.

To discourage future use of the road, a sign will be installed on the fence, i.e. "Seeded Area -- Do Not Disturb" or equivalent. Further protection measures, such as constructing an earthen berm restricting access to the reclaimed area, may also be employed.

4.3 Re-establishing Surface Hydrology

Eroded areas will be filled in using fill material from the well location and BMPs for stormwater pollution prevention such as silt traps, excelsior mats, wattles/sediment control logs and straw distributed on the surface and crimped or harrowed into the soil after drill seeding.

Temporary stormwater BMPs would be removed upon completion of construction activities. Drainage, sediment, and erosion controls would be managed through vegetative practices and/or biodegradable materials (i.e. soil blankets, straw wattles, crimped straw, mulch, brush and woody debris, pocking, etc.).

All drainage, sediment, and erosion controls would be implemented in accordance with Four Star's standard Stormwater Management Plan. Drainage from the south-western portion of the pad will be directed to the North East.

4.4 Re-Vegetation

Following soil preparations, a disk seeder will be used to apply the approved seed mix over the disturbed areas. The seeder will be equipped with a depth regulator to ensure even planting depths appropriate to the plant species and soil types. Should broadcast seeding be deemed more appropriate in some areas, the

seed application rates would be doubled and a rake or harrow would be used to incorporate the seed into the soil. Any steep slopes, greater than 2:1, would be blanketed for soil stabilization and seed retention.

The seed mixture and application rates for the Sagebrush/Badlands Vegetative Community, as recommended by the BLM, would be as follows:

<u>Species</u>	<u>Variety</u>	<u>Pound/Acre (PLS)</u>
Winterfat	VNS	2.0
Galleta	Viva	3.0
Indian Ricegrass	Paloma or Rimrock	4.0
Western Wheatgrass	Arriba	4.0
Fourwing Saltbrush	VNS	2.0
Siberian Wheatgrass	Vavilov	3.0
Rocky Mtn. bee plant	Local Collection	0.25
Scarlet Globemallow	VNS	0.25

*Seed mix is available locally or from Southwest Seed in Dolores, CO.

*Recommended seeding rate will be doubled if seed is applied by broadcasting or hydroseeding

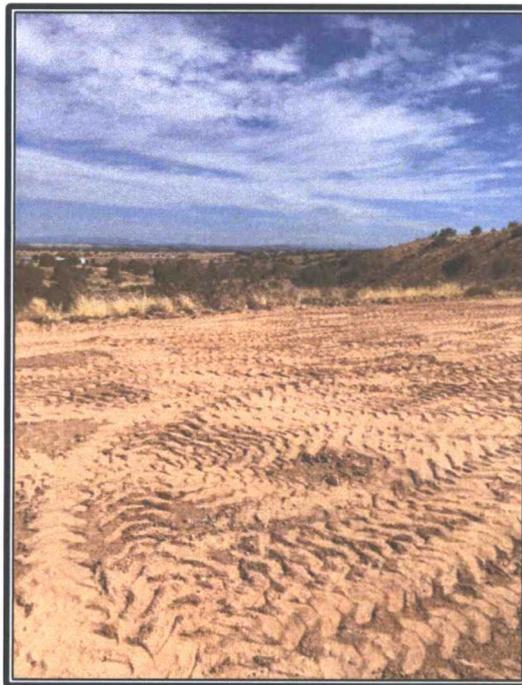
Seed mixtures would be certified weed-free and the seeding records (bag labels) or other official documentation would be provided to the Authorized Officer at least 14 days before the date of proposed seeding for acceptance.

Seeding will be accomplished as soon as reasonably possible following completion of earthwork activities, generally within 7 days. The Authorized Officer would be notified forty-eight (48) hours prior to commencing with seed application.

Site Photography
Chevron North America
Riggs #2 Well Site
Below Grade Tank Closure
Project Number 92270-1653
August 17, 2017



Picture 1: Former Below Grade Tank



Picture 2: Backfilled, Re-contoured, and Re-vegetated Below Grade Tank Pit

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

Form C-138
Revised August 1, 2011

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

*Surface Waste Management Facility Operator
and Generator shall maintain and make this
documentation available for Division inspection.

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. Generator Name and Address: Chevron, C/O Isaac Reyes, 332 County Road 3100, Aztec, NM 87410
2. Originating Site: Riggs #2
3. Location of Material (Street Address, City, State or ULSTR): 30-045-29118 SE/SW -4 -29N -12W 36.751893 -108.107209
4. Source and Description of Waste: 1. One load of produced water removed from the interior of a pit tank (classified as "Tank Bottoms") (10 BBLs) 2. Fluids removed from interior of separator (10 BBL)
Estimated Volume: 20 yd ³ / bbls Known Volume (to be entered by the operator at the end of the haul) _____ yd ³ / bbls
5. GENERATOR CERTIFICATION STATEMENT OF WASTE STATUS I, Isaac Reyes <i>IR</i> , representative or authorized agent for Chevron do hereby PRINT & SIGN NAME COMPANY NAME certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is: (Check the appropriate classification) <input checked="" type="checkbox"/> RCRA Exempt: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste. <i>Operator Use Only: Waste Acceptance Frequency</i> <input type="checkbox"/> Monthly <input type="checkbox"/> Weekly <input type="checkbox"/> Per Load <input type="checkbox"/> RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items) <input type="checkbox"/> MSDS Information <input type="checkbox"/> RCRA Hazardous Waste Analysis <input type="checkbox"/> Process Knowledge <input type="checkbox"/> Other (Provide description in Box 4)
GENERATOR 19.15.36.15 WASTE TESTING CERTIFICATION STATEMENT FOR LANDFARMS I, Isaac Reyes <i>IR</i> , representative for Chevron do hereby certify that representative samples of the oil field waste have been subjected to the paint filter test and tested for chloride content and that the samples have been found to conform to the specific requirements applicable to landfarms pursuant to Section 15 of 19.15.36 NMAC. The results of the representative samples are attached to demonstrate the above-described waste conform to the requirements of Section 15 of 19.15.36 NMAC.
5. Transporter: Riley Industrial

OCD Permitted Surface Waste Management Facility

Name and Facility Permit #: Envirotech Inc. Soil Remediation Facility Permit # NM-01-0011

Address of Facility: #43 Road 7175, south of Bloomfield NM

Method of Treatment and/or Disposal:

- Evaporation Injection Treating Plant Landfarm Landfill Other

Waste Acceptance Status:

APPROVED

DENIED (Must Be Maintained As Permanent Record)

PRINT NAME: _____

TITLE: _____

DATE: _____

SIGNATURE: _____
Surface Waste Management Facility Authorized Agent

TELEPHONE NO.: _____



Bill of Lading

MANIFEST # **56456**
 GENERATOR Chevron
 POINT OF ORIGIN Riggs #2
 TRANSPORTER Riley
 DATE 5-2-17 JOB # 92270-1629

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT					TRANSPORTING COMPANY			
	DESTINATION	MATERIAL	GRID	YDS	BBLS	TKT#	TRK#	TIME	DRIVER SIGNATURE
1	BF	Tank Bottoms			4		18002	1340	<i>[Signature]</i>
-	BF	Wash out			3		18002	1340	
					<u>7</u>				

RESULTS		LANDFARM EMPLOYEE	<i>Gay Robinson</i> EL Certification of above receipt & placement	NOTES
423	CHLORIDE TEST			
	PAINT FILTER TEST			

By signing as the driver/transporter, I certify the material hauled from the above location has not been added to or tampered with. I certify the material is from the above mentioned Generator/Point of Origin and that no additional material has been added or mixed into the load.

Generator Onsite Contact _____ Phone _____

Signatures required prior to distribution of the legal document. DISTRIBUTION: White - Company Records, Yellow - Billing, Pink - Customer, Goldenrod - LF Copy



BOL# 56456

CHLORIDE TESTING / PAINT FILTER TESTING

DATE 5-2-17 TIME 1340

Attach test strip here

CUSTOMER Chevron

SITE Riggs #2

DRIVER [Signature]

SAMPLE Soil Straight With Dirt

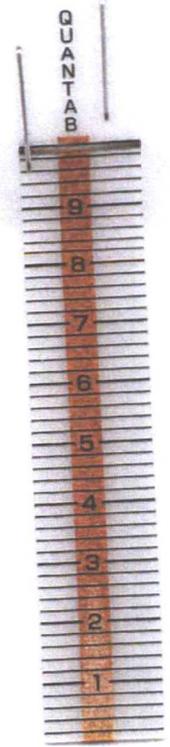
CHLORIDE TEST 423 mg/Kg

ACCEPTED YES NO

PAINT FILTER TEST Time started 1340 Time completed 1353

PASS YES NO

SAMPLER/ANALYST Gary Robinson





September 26, 2017

Project Number 92270-1628

Mr. Isaac Reyes
Chevron North America
332 CR 3100
Aztec, New Mexico 87410

Email: isaacreyes@chevron.com
Phone: (505) 333-1954

RE: NORM SCREENING, LEAD PAINT SAMPLING, AND BELOW GRADE TANK (BGT) SOIL SAMPLING DOCUMENTATION FOR THE RIGGS UNIT #2 WELL SITE LOCATED IN SECTION 4, TOWNSHIP 29 NORTH, RANGE 12 WEST, SAN JUAN COUNTY, NEW MEXICO

Dear Mr. Reyes,

Enclosed please find the *Vicinity Map*, *Field Notes*, *Summary of Analytical Results*, and *Analytical Results* for Naturally Occurring Radioactive Material (NORM) screening, lead paint sampling, and Below Grade Tank (BGT) soil sampling activities performed at the Riggs Unit #2 well site located at Section 4, Township 29 North, Range 12 West, San Juan County, New Mexico (site); see enclosed *Vicinity Map*.

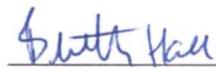
On August 16, 2017, Envirotech personnel performed NORM screening and lead paint sampling activities on production equipment at the aforementioned site. NORM screening results were below the allowable concentrations of two (2) times the background concentration; see enclosed *Field Notes*. One (1) sample of paint was collected from the BGT. The sample was placed into a quart size Ziploc bag and submitted to EMC Labs, Inc. for lead analysis. The sample returned a result below the Environmental Protection Agency (EPA) regulatory standard of 0.5% lead by weight and is therefore, considered to be a non-lead based paint; see enclosed *Analytical Results*.

Additionally, Envirotech personnel collected one (1) five (5) point composite soil sample from beneath the former location of the BGT. The sample was screened in the field for organic vapors (OV) using a Photoionization Detector (PID) and for total petroleum hydrocarbons (TPH) using USEPA Method 418.1. The sample returned a result of non-detect for OV and 156 mg/Kg for TPH; see enclosed *Field Notes*. The sample was placed into four (4)-ounce, laboratory-provided, glass jar, capped head space free, and transported on ice under chain of custody to Envirotech's Analytical Laboratory to be analyzed for BTEX using USEPA Method 8021B, Gasoline Range Organics (GRO), Diesel Range Organics (DRO), and Oil Range Organics (ORO) using USEPA Method 8015D, TPH using USEPA Method 418.1, and for Chlorides using USEPA Method 300.1. The sample returned results below the New Mexico Oil Conservation Division BGT

regulatory standard of 100 mg/kg for TPH, 0.2 mg/kg for benzene, 50 mg/kg total BTEX, and 250 mg/kg for chlorides; see enclosed *Analytical Results*. Based on the analytical results, Envirotech recommends *No Further Action* in regards to this project.

We appreciate the opportunity to be of service. If you have questions or require additional information, please contact our office at (505) 632-0615.

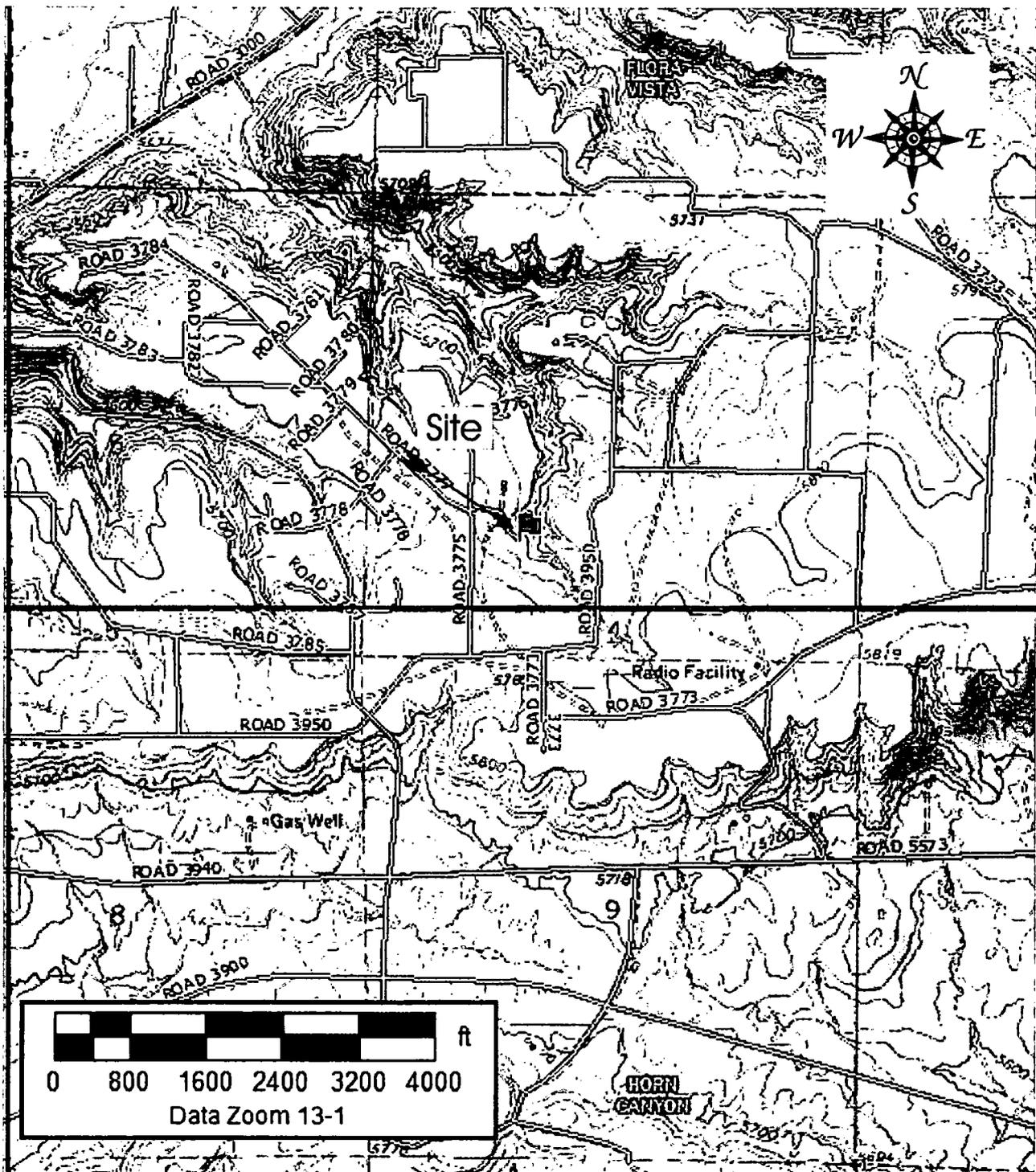
Respectfully submitted,
ENVIROTECH, INC.



Brittany Hall
Environmental Field Technician
bhall@envirotech-inc.com

Enclosure(s): Vicinity Map
Field Notes
Summary of Analytical Results
Analytical Results

Cc: Client File 92270



Source: 7.5 Minute, Horn Canyon, New Mexico U.S.G.S. Topographic Quadrangle Map
 Scale: 1:24,000 1" = 2000'

<p>Chevron North America Riggs Unit #2 Section 4 Township 29N Range 12W San Juan County, New Mexico</p>	 <p>5796 U.S. HIGHWAY 64 Farmington, New Mexico 87401 505.632.0615</p>	<p>Vicinity Map</p>	
<p>Project Number: 92270-1628 Date Drawn: 9/18/17</p>		<p>Figure #1</p> <p>DRAWN BY: Brittany Hall PROJECT MANAGER: Felipe Aragon</p>	

CLIENT: Chevron
 CLIENT/JOB #: 92270-1629
 START DATE: 8/6/17
 FINISH DATE: 8/16/17
 Page # 1 of 1



Environmental Specialist: BHall
 LAT: 36.7518368
 LONG: -108.107387

FIELD REPORT: BELOW GROUND TANK VERIFICATION

LOCATION NAME: Riggs WELL #: 2 Temp Pit: NA PERM Pit: NA
 QUAD/UNIT: SEC: 4 TWP: 29 N RNG: 12 W PM:
 QTR/FOOTAGE: 1195' FSL 1640' FACNTY: San Juan ST: New Mexico

Excavation Approx: 10 Feet X 10 Feet X 4 Feet Deep Cubic Yardage: 14.0
 Disposal Facility: Remediation Method:
 Land Owner: API: 3004529118 Pit Volume: 95 bbl
 Construction Material: Steel Double Walled, With Leak Detection: YES

Temporary Pit Closure: NMAC 19.15.17 Table II (Permitted after 6/28/2013)
 BGT Closure: NMAC 19.15.17 Table I (Permitted after 6/28/2013)
 X BGT Closure: BENZENE ≤ 0.2 mg/kg, BTEX ≤ 50 mg/kg, TPH (418.1) ≤ 100 mg/kg, CHLORIDES ≤ 250 mg/kg (Permitted before 6/28/2013)

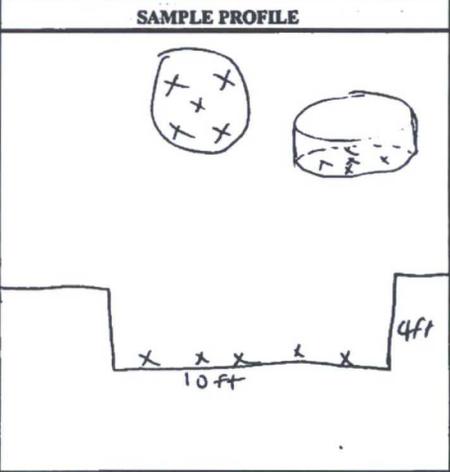
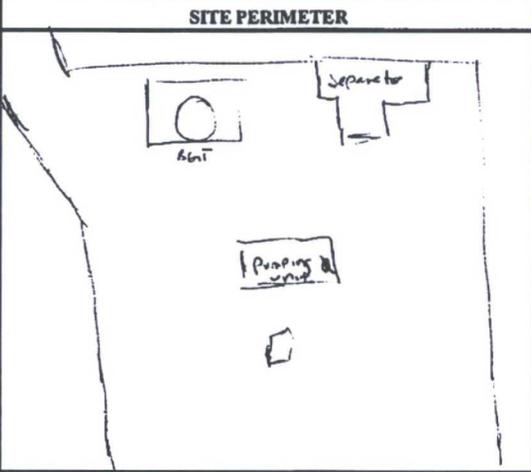
FIELD 418.1 ANALYSIS

SAMPLE DESCRIPTION	TIME	SAMPLE ID	LAB #	WEIGHT	mL FREON	DILUTION	READING	CALC. (mg/kg)
<u>Below BGT</u>	<u>1130</u>	<u>BGT Composite</u>		<u>5g</u>	<u>20</u>	<u>4</u>	<u>39</u>	<u>154</u>
<u>200 std</u>		<u>STD</u>		<u>-</u>	<u>-</u>	<u>-</u>	<u>196</u>	

PID RESULTS	
SAMPLE ID	RESULTS (mg/kg)
<u>BGT</u>	<u>0.00</u>

FIELD CHLORIDES RESULTS		
SAMPLE ID	READING	CALC. (mg/kg)
<u>NA</u>		

SAMPLE ID	ANALYSIS	US EPA
<u>Bgt Composite</u>	<u>BENZENE</u>	<u>8021B/8015</u>
<u>Bgt Composite</u>	<u>BTEX</u>	<u>8021B/80260B</u>
<u>Bgt Composite</u>	<u>GRO & DRO</u>	<u>8015</u>
<u>BGT Composite</u>	<u>CHLORIDES</u>	<u>EPA300</u>
<u>Bgt Composite</u>	<u>TPH</u>	<u>418.1</u>



Brittany Hall
 Analyst Signature
Brittany Hall
 Printed Name

NOTES:
 WO #: Who ordered/Site Rep.: 1. [Signature]

CLIENT: Chemon
CLIENT/JOB # 92270-1028
START DATE: 8/16/17
FINISH DATE: _____



Environmental Specialist: Bhael
C.O.C. No: _____
LAT 36.75188368
LONG -108.107387

Page # _____ of _____

FIELD REPORT: LEAD AND ASBESTOS SAMPLING

LOCATION NAME: Pigg 2 WELL #: _____ API: 30-045-29118

QUAD/UNIT: _____ SEC: 4 TWP: 29N RNG: DW PM: _____

QTR/FOOTAGE: _____ CNTY: San Juan ST: NM

LEAD SAMPLES COLLECTED

TIME	SAMPLE I.D.	LEAD PAINT PEN RESULTS (Detected or Not Detected)	Lab Test Sample Collected (Yes or No)	Description
<u>1124</u>	<u>BGT</u>	<u>NP</u>	<u>Yes</u>	<u>Black chips</u>

ASBESTOS CONTAINING MATERIALS (ACM) SAMPLES COLLECTED

TIME	SAMPLE I.D.	Description
	<u>N/A</u>	

NOTES:

Butter Hall
Analyst Signature

8/16/17
Date

Brittany Hall
Printed Name



CONTINUOUS CALIBRATION
EPA METHOD 418.1
TOTAL PETROLEUM
HYDROCARBONS

Cal. Date: 16-Aug-17

Parameter	Standard Concentration mg/L	Concentration Reading mg/L
TPH	100	196
	200	
	500	
	1000	
	5000	

The accepted percent relative deviation (%RSD) of the calibration factor is less than 20% over the working range.

Britany Hall

Analyst

9/18/2017

Date

Britany Hall

Print Name

Felipe Aragon

Review

9/18/2017

Date

Felipe Aragon, CES

Print Name



EPA METHOD 418.1
TOTAL PETROLEUM
HYDROCARBONS

Client: Chevron Project #: 92270-1628
Sample No.: 1 Date Reported: 9/18/2017
Sample ID: BGT Comp Date Sampled: 8/16/2017
Sample Matrix: Soil Date Analyzed: 8/16/2017
Preservative: Cool Analysis Needed: TPH-418.1
Condition: Cool and Intact

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Total Petroleum Hydrocarbons	156	5.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: **Riggs Unit #2**

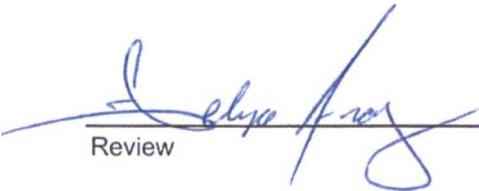
Instrument calibrated to 200 ppm standard and zeroed before each sample.



Analyst

Britany Hall

Printed



Review

Felipe Aragon, CES

Printed

Table 1, Summary of Analytical Results
 Chevron North America
 Riggs #2 Well Site
 BGT Closure Report
 Project Number 92270-1628

Date	Sample Description	Sample Number	PID OV (ppm)	USEPA Method 418.1 TPH (mg/kg)	USEPA Method 8015 TPH (mg/kg)	Chlorides (mg/kg)	USEPA Method 8021	
							Benzene (mg/kg)	BTEX (mg/kg)
NA	New Mexico Oil Conservation Division Standards	NA	100	100	100	250	0.2	50
4/26/2017	BGT Comp	1	0	<40.0	<25.0	<20.0	<0.1	<0.1

*Values in **BOLD** above regulatory limits
 *Closure Sample

*NS - Parameter not samp *ND - Parameter not detected



Analytical Report

Report Summary

Client: Chevron

Chain Of Custody Number:

Samples Received: 8/17/2017 1:25:00PM

Job Number: 92270-1628

Work Order: P708052

Project Name/Location: Riggs #2

Report Reviewed By:

Date: 8/23/17

Walter Hinchman, Laboratory Director

Date: 8/23/17

Tim Cain, Quality Assurance Officer

The results in this report apply to the samples submitted to Envirotech's Analytical Laboratory and were analyzed in accordance with the chain of custody document supplied by you, the client, and as such are for your exclusive use only. The results in this report are based on the sample as received unless otherwise noted. Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech, Inc. If you have any questions regarding this analytical report, please don't hesitate to contact Envirotech's Laboratory Staff.



Chevron 322 Road 3100 Aztec NM, 87410	Project Name: Project Number: Project Manager:	Riggs #2 92270-1628 Felipe Aragon	Reported: 23-Aug-17 13:03
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Analytical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
BGT Composite	P708052-01A	Soil	08/17/17	08/17/17	Glass Jar, 4 oz.

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Chevron 322 Road 3100 Aztec NM, 87410	Project Name: Riggs #2 Project Number: 92270-1628 Project Manager: Felipe Aragon	Reported: 23-Aug-17 13:03
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**BGT Composite
P708052-01 (Solid)**

Reporting									
Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Volatile Organics by EPA 8021									
Benzene	ND	0.10	mg/kg	1	1734004	08/21/17	08/21/17	EPA 8021B	
Toluene	ND	0.10	mg/kg	1	1734004	08/21/17	08/21/17	EPA 8021B	
Ethylbenzene	ND	0.10	mg/kg	1	1734004	08/21/17	08/21/17	EPA 8021B	
p,m-Xylene	ND	0.20	mg/kg	1	1734004	08/21/17	08/21/17	EPA 8021B	
o-Xylene	ND	0.10	mg/kg	1	1734004	08/21/17	08/21/17	EPA 8021B	
Total Xylenes	ND	0.10	mg/kg	1	1734004	08/21/17	08/21/17	EPA 8021B	
Total BTEX	ND	0.10	mg/kg	1	1734004	08/21/17	08/21/17	EPA 8021B	
<i>Surrogate: 4-Bromodibromobenzene-PID</i>		96.5 %		50-150	1734004	08/21/17	08/21/17	EPA 8021B	
Nonhalogenated Organics by 8015									
Gasoline Range Organics (C6-C10)	ND	20.0	mg/kg	1	1734004	08/21/17	08/21/17	EPA 8015D	
Diesel Range Organics (C10-C28)	ND	25.0	mg/kg	1	1734002	08/21/17	08/21/17	EPA 8015D	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		98.4 %		50-150	1734004	08/21/17	08/21/17	EPA 8015D	
<i>Surrogate: n-Nonane</i>		103 %		50-200	1734002	08/21/17	08/21/17	EPA 8015D	
Anions by 300.0									
Chloride	ND	20.0	mg/kg	1	1734003	08/21/17	08/21/17	EPA 300.0	
Total Petroleum Hydrocarbons by 418.1									
Total Petroleum Hydrocarbons	ND	40.0	mg/kg	1	1734008	08/21/17	08/21/17	EPA 418.1	

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Chevron 322 Road 3100 Aztec NM, 87410	Project Name: Riggs #2 Project Number: 92270-1628 Project Manager: Felipe Aragon	Reported: 23-Aug-17 13:03
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Volatile Organics by EPA 8021 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1734004 - Purge and Trap EPA 5030A										
Blank (1734004-BLK1)				Prepared & Analyzed: 21-Aug-17						
Benzene	ND	0.10	mg/kg							
Toluene	ND	0.10	"							
Ethylbenzene	ND	0.10	"							
p,m-Xylene	ND	0.20	"							
o-Xylene	ND	0.10	"							
Total Xylenes	ND	0.10	"							
Total BTEX	ND	0.10	"							
<i>Surrogate: 4-Bromochlorobenzene-PID</i>	7.71		"	8.00		96.4	50-150			
LCS (1734004-BS1)				Prepared & Analyzed: 21-Aug-17						
Benzene	4.69	0.10	mg/kg	5.00		93.9	70-130			
Toluene	4.67	0.10	"	5.00		93.4	70-130			
Ethylbenzene	4.65	0.10	"	5.00		93.0	70-130			
p,m-Xylene	9.26	0.20	"	10.0		92.7	70-130			
o-Xylene	4.54	0.10	"	5.00		90.9	70-130			
Total Xylenes	13.8	0.10	"	15.0		92.1	70-130			
<i>Surrogate: 4-Bromochlorobenzene-PID</i>	7.73		"	8.00		96.7	50-150			
Matrix Spike (1734004-MS1)				Source: P708052-01		Prepared & Analyzed: 21-Aug-17				
Benzene	4.64	0.10	mg/kg	5.00	ND	92.9	54.3-133			
Toluene	4.60	0.10	"	5.00	ND	92.0	61.4-130			
Ethylbenzene	4.60	0.10	"	5.00	ND	92.0	61.4-133			
p,m-Xylene	9.14	0.20	"	10.0	ND	91.5	63.3-131			
o-Xylene	4.50	0.10	"	5.00	ND	90.0	63.3-131			
Total Xylenes	13.6	0.10	"	15.0	ND	91.0	63.3-131			
<i>Surrogate: 4-Bromochlorobenzene-PID</i>	7.78		"	8.00		97.2	50-150			
Matrix Spike Dup (1734004-MSD1)				Source: P708052-01		Prepared & Analyzed: 21-Aug-17				
Benzene	4.52	0.10	mg/kg	5.00	ND	90.5	54.3-133	2.66	20	
Toluene	4.48	0.10	"	5.00	ND	89.6	61.4-130	2.64	20	
Ethylbenzene	4.47	0.10	"	5.00	ND	89.5	61.4-133	2.70	20	
p,m-Xylene	8.90	0.20	"	10.0	ND	89.0	63.3-131	2.75	20	
o-Xylene	4.38	0.10	"	5.00	ND	87.6	63.3-131	2.74	20	
Total Xylenes	13.3	0.10	"	15.0	ND	88.5	63.3-131	2.75	20	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>	7.79		"	8.00		97.4	50-150			

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Chevron 322 Road 3100 Aztec NM, 87410	Project Name: Riggs #2 Project Number: 92270-1628 Project Manager: Felipe Aragon	Reported: 23-Aug-17 13:03
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Nonhalogenated Organics by 8015 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1734002 - DRO Extraction EPA 3570										
Blank (1734002-BL.K1) Prepared & Analyzed: 21-Aug-17										
Diesel Range Organics (C10-C28)	ND	25.0	mg/kg							
Surrogate: n-Nonane	58.7		"	50.0		117	50-200			
LCS (1734002-BS1) Prepared & Analyzed: 21-Aug-17										
Diesel Range Organics (C10-C28)	465	25.0	mg/kg	500	ND	92.9	38-132			
Surrogate: n-Nonane	50.4		"	50.0		101	50-200			
Matrix Spike (1734002-MS1) Source: P708052-01 Prepared & Analyzed: 21-Aug-17										
Diesel Range Organics (C10-C28)	499	25.0	mg/kg	500	ND	99.8	38-132			
Surrogate: n-Nonane	49.9		"	50.0		99.8	50-200			
Matrix Spike Dup (1734002-MSD1) Source: P708052-01 Prepared & Analyzed: 21-Aug-17										
Diesel Range Organics (C10-C28)	497	25.0	mg/kg	500	ND	99.4	38-132	0.377	20	
Surrogate: n-Nonane	51.3		"	50.0		103	50-200			

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Chevron 322 Road 3100 Aztec NM, 87410	Project Name: Riggs #2 Project Number: 92270-1628 Project Manager: Felipe Aragon	Reported: 23-Aug-17 13:03
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Nonhalogenated Organics by 8015 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1734004 - Purge and Trap EPA 5030A										
Blank (1734004-BLK1)				Prepared & Analyzed: 21-Aug-17						
Gasoline Range Organics (C6-C10)	ND	20.0	mg/kg							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.76		"	8.00		97.0	50-150			
LCS (1734004-BS1)				Prepared & Analyzed: 21-Aug-17						
Gasoline Range Organics (C6-C10)	54.9	20.0	mg/kg	60.9	ND	90.1	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.80		"	3.00		97.5	50-150			
Matrix Spike (1734004-MS1)				Source: P708052-01		Prepared & Analyzed: 21-Aug-17				
Gasoline Range Organics (C6-C10)	54.8	20.0	mg/kg	60.9	ND	90.0	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.93		"	8.00		99.1	50-150			
Matrix Spike Dup (1734004-MSD1)				Source: P708052-01		Prepared & Analyzed: 21-Aug-17				
Gasoline Range Organics (C6-C10)	53.5	20.0	mg/kg	60.9	ND	87.8	70-130	2.40	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.96		"	8.00		99.4	50-150			

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Chevron 322 Road 3100 Aztec NM, 87410	Project Name: Riggs #2 Project Number: 92270-1628 Project Manager: Felipe Aragon	Reported: 23-Aug-17 13:03
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Anions by 300.0 - Quality Control
Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1734003 - Anion Extraction EPA 300.0										
Blank (1734003-BLK1) Prepared & Analyzed: 21-Aug-17										
Chloride	ND	20.0	mg/kg							
LCS (1734003-BS1) Prepared & Analyzed: 21-Aug-17										
Chloride	259	20.0	mg/kg	250		104	90-110			
Matrix Spike (1734003-MS1) Source: P708056-01 Prepared & Analyzed: 21-Aug-17										
Chloride	3510	20.0	mg/kg	250	3150	145	80-120			SPK2
Matrix Spike Dup (1734003-MSD1) Source: P708056-01 Prepared & Analyzed: 21-Aug-17										
Chloride	3390	20.0	mg/kg	250	3150	97.5	80-120	3.42	20	

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Chevron 322 Road 3100 Aztec NM, 87410	Project Name: Riggs #2 Project Number: 92270-1628 Project Manager: Felipe Aragon	Reported: 23-Aug-17 13:03
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Total Petroleum Hydrocarbons by 418.1 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1734008 - 418 Freon Extraction										
Blank (1734008-BLK1)				Prepared & Analyzed: 21-Aug-17						
Total Petroleum Hydrocarbons	ND	40.0	mg/kg							
LCS (1734008-BS1)				Prepared & Analyzed: 21-Aug-17						
Total Petroleum Hydrocarbons	928	40.0	mg/kg	1000		92.8	80-120			
Matrix Spike (1734008-MS1)				Prepared & Analyzed: 21-Aug-17						
		Source: P708052-01								
Total Petroleum Hydrocarbons	954	40.0	mg/kg	1000	ND	95.4	70-130			
Matrix Spike Dup (1734008-MSD1)				Prepared & Analyzed: 21-Aug-17						
		Source: P708052-01								
Total Petroleum Hydrocarbons	988	40.0	mg/kg	1000	ND	98.8	70-130	3.50	30	

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Chevron 322 Road 3100 Aztec NM, 87410	Project Name: Riggs #2 Project Number: 92270-1628 Project Manager: Felipe Aragon	Reported: 23-Aug-17 13:03
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Notes and Definitions

- SPK2 The spike recovery was outside of QC acceptance limits for the MS and/or MSD due to native analyte concentration at 4 times or greater than the spike concentration.
- DET Analyte DETECTED
- ND Analyte NOT DETECTED at or above the reporting limit
- NR Not Reported
- dry Sample results reported on a dry weight basis
- RPD Relative Percent Difference

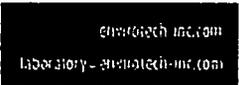
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Project Information

Chain of Custody

Client: CHEVRON
 Project: Riggs #2
 Project Manager: F. Hogan
 Address:
 City, State, Zip
 Phone:
 Email: F. Hogan

Report Attention
 Report due by: Standard
 Attention: F. Hogan / Isaac / B. H.
 Address:
 City, State, Zip
 Phone:
 Email: Felipe / Isaac / B. H.

Lab Use Only
 Lab WOH# P 708052 Job Number 97270-1628
 TAT
 1D 3D RCRA CWA SDWA

Analysis and Method
 DRO/ORO by 8015
 GRO/DRO by 8015
 BTEX by 8021
 VOC by 8260
 Metals 6010
 Chlorides 300.0
 TPH 418.1
 State
 NM CO UT AZ

Time Sampled	Date Sampled	Matrix	No Containers	Sample ID	Lab Number	DRO/ORO by 8015	GRO/DRO by 8015	BTEX by 8021	VOC by 8260	Metals 6010	Chlorides 300.0	TPH 418.1	Remarks
1300	8-17-17	S	2-402	BGT Compos. to	1		X	X			X	X	

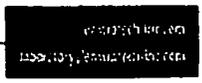
Additional Instructions:

I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabeling the sample location, date or time of collection is considered fraud and may be grounds for legal action. Sampled by: Felipe Hogan

Relinquished by: (Signature) [Signature] Date 8/17/17 Time 13:25 Received by: (Signature) [Signature] Date 8/17/17 Time 13:25
 Relinquished by: (Signature) _____ Date _____ Time _____ Received by: (Signature) _____ Date _____ Time _____
 Lab Use Only
 Received on ice: (Y) N
 T1 T2 T3
 AVG Temp °C 4.0

Sample Matrix: S - Soil, Sd - Solid, Sg - Sludge, A - Aqueous, O - Other
 Container Type: g - glass, p - poly/plastic, ag - amber glass, v - VOA
 Note: Samples are discarded 30 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report. 1 cc in cooler.

Page 10 of 10





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emclab@emclabs.com

LEAD (Pb) IN PAINT CHIP SAMPLES
EMC SOP METHOD #L01/1 EPA SW-846 METHOD 7420

EMC LAB #: L65903		DATE RECEIVED: 08/17/17			
CLIENT: Envirotech		REPORT DATE: 08/21/17			
		DATE OF ANALYSIS: 08/21/17			
CLIENT ADDRESS: 5796 US Hwy 64 Farmington, NM 87401		P.O. NO.: 144520			
PROJECT NAME: Chevron-Riggs #2		PROJECT NO.: 92270-1628			
EMC # L65903-	SAMPLE DATE /17	CLIENT SAMPLE #	DESCRIPTION	REPORTING LIMIT (%Pb by weight)	%Pb BY WEIGHT
1	08/16	O-12313	BGT 1124	0.010	BRL

^A = Dilution Factor Changed * = Excessive Substrate May Bias Sample Results BRL = Below Reportable Limits # = Very Small Amount Of Sample Submitted, May Affect Result

This report applies to the standards or procedures identified and to the samples tested only. The test results are not necessarily indicative or representative of the qualities of the lot from which the sample was taken or of apparently identical or similar products, nor do they represent an ongoing quality assurance program unless so noted. Unless otherwise noted, all quality control analyses for the samples noted above were within acceptable limits.

Where it is noted that a sample with excessive substrate was submitted for laboratory analysis, such analysis may be biased. The lead content of such sample may, in actuality, be greater than reported. EMC makes no warranty, express or implied, as to the accuracy of the analysis of samples noted to have been submitted with excessive substrate. Resampling is recommended in such situations to verify original laboratory results.

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ANALYST: 
Jason Thompson

QA COORDINATOR: 
Kurt Kettler