

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

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

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

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party BPX Energy	OGRID 778	Closure
Contact Name Steve Moskal	Contact Telephone (505) 330-9179	
Contact email Steven.Moskal@bpx.com	Incident # (assigned by OCD)	NWF 1821829822
Contact mailing address 380 North Airport Road, Durango, CO 81303		

Location of Release Source

Latitude 36.62954 Longitude -108.08652
(NAD 83 in decimal degrees to 5 decimal places)

Site Name GALLEGOS CANYON UNIT 232	Site Type Natural Gas Well
Date Release Discovered 08/20/2012	API# (if applicable) 30-045-11630

Unit Letter	Section	Township	Range	County
M	26	28N	12W	San Juan

NMOCB

APR 25 2019

DISTRICT III

Surface Owner: State Federal Tribal Private (Name: _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) Unknown	Volume Recovered (bbls) None
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input checked="" type="checkbox"/> Condensate	Volume Released (bbls) Unknown	Volume Recovered (bbls) None
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release **Undetermined. Possible causes; likely previous BGT integrity loss or overflow event(s).**

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Was this a major release as defined by 19.15.29.7(A) NMAC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? Identified after BGT closure on 05/29/2018 (
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? Yes. July 25, 2018 BGT Closure Form C-144 submitted to NMOCD	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why: 	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
Printed Name: <u>Steve Moskal</u>	Title: <u>Environmental Coordinator</u>
Signature: 	Date: <u>4/24/2019</u>
email: <u>Steven.Moskal@bpx.com</u>	Telephone: <u>(505) 330-9179</u>
<u>OCD Only</u> Received by: _____ Date: _____	

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Site Assessment/Characterization

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

What is the shallowest depth to groundwater beneath the area affected by the release?	<u><50</u> (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

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

- Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- Field data
- Data table of soil contaminant concentration data
- Depth to water determination
- Determination of water sources and significant watercourses within 1/2-mile of the lateral extents of the release
- Boring or excavation logs
- Photographs including date and GIS information
- Topographic/Aerial maps
- Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

State of New Mexico
Oil Conservation Division

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Printed Name: Steve Moskal Title: Enviro Coord

Signature:  Date: 4/24/2019

email: Steven.moskal@bpx.com Telephone: 505-330-9179

OCD Only

Received by: _____ Date: _____

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Remediation Plan

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

- Detailed description of proposed remediation technique
- Scaled sitemap with GPS coordinates showing delineation points
- Estimated volume of material to be remediated
- Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- Extents of contamination must be fully delineated.
- Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

- Approved
 Approved with Attached Conditions of Approval
 Denied
 Deferral Approved

Signature: _____ Date: _____

Incident ID	
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Facility ID	
Application ID	

Closure

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

Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.*

- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Steve Moskal Title: Enviro Coord

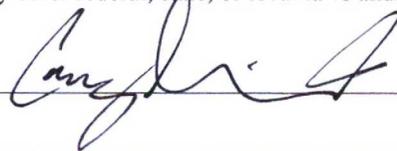
Signature:  Date: 4/24/2019

email: Steven.moskal@bpx.com Telephone: 505-330-9179

OCD Only

Received by:  Date: 4/25/19

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

Closure Approved by:  Date: 5/20/19
Printed Name: Cory Title: Environmental Spec

BP America

GCU 232 - API: 30-045-11630

(M) Sec 26 – T28N – R12W, San Juan County, New Mexico

Summary Record of Impact Remediation (Steel 95 BGT (SW/DB) – for Separator/Compressor)

June 3, 2010 Initial BGT Permit (C-144) submitted to NMOCD – Santa Fe.

June 22, 2017 Initial BGT Permit (C-144) scanned into NMOCD electronic data base.

May 18, 2018 NMOCD and BLM notified of pending 95 BGT closure

- May 29, 2018
1. Confirmation sampling conducted of a 95 barrel below grade tank (BGT). 5 point composite sample (5pcs) collected directly beneath BGT at 6 feet (ft.) below grade (b.g.). No visual evidence of impacts.
 2. New Mexico Oil Conservation Division (NMOCD) site closure standard interpreted at 100 mg/kg TPH and 600 mg/Kg Chlorides based on:
 - Distance to groundwater: < 50 ft. (bgt permit hydrogeological report)
 - Distance to nearest water source: > 1,000 ft.
 - Distance to surface water: > 300 ft.
 3. Federal mineral & surface lease.

May 30, 2018 Laboratory results received from BGT sampling. Test results listed below.

BGT Confirmation & Initial Delineation Sampling Laboratory Analytical Results

Sample ID (composites)	Field OVM (ppm)	TPH (GRO+DRO+MRO) (mg/Kg)	Total BTEX (mg/Kg)	Benzene (mg/Kg)	Chloride (mg/Kg)
5PC-TB @ 6' (95)	NA	ND	ND	ND	700

OVM – Organic Vapor Meter, ppm – parts per million, GRO – Gasoline Range Organics, DRO – Diesel Range Organics, mg/Kg – milligram per kilogram.

July 25, 2018 BGT Closure Form C-144 submitted to NMOCD, requesting closure as is.

August 6, 2018 NMOCD rejects closure request, requiring remediation of chlorides.

April 8, 2019 NMOCD/BLM notified of pending BGT remedial closure sampling

April 12, 2019 Remedial excavation completed. Final size: 14' x 14' x 8' deep.
Field screening of chlorides conducted while excavating to establish preliminary closure
Excavation sampled for closure of chlorides.

April 15, 2019 Receive preliminary laboratory results from closure sampling. All samples passed.
NMOCD notified of passing closure sampling results.

Excavation Closure Sampling Test Results

April 12, 2019

Sample ID	5-pt Comp. Depths	Time	Field Chloride (ppm)	Lab Chloride (mg/Kg)
Base	8'	1440	212	131
N. Wall	3'-7'	1509	112	ND
W. Wall	3'-7'	1505	112	ND
S. Wall	3'-7'	1459	112	27.2
E. Wall	3'-7'	1455	112	ND
Standard:				600

ND = not detected

Notes: Encounter backfill material from 0' – 5' depth. Find pea gravel used for original BGT base at 5'-5.5'.

Native soils outside of BGT excavation are a wind blown silt from 0' – 6'. White caliche from 6'-7'.

Coarse sand with small rounded pebbles encountered from 7'-TD of excavation at 8'.

White caliche included with all sidewall sampling composites. Base sample composite was the coarse sand.

Field chloride test strips minimum reading 112 ppm. Sidewalls all registered at this minimum value.

April 16, 2019

Completed excavation backfilling with clean imported material.

GCU 232
(M) Sec 26 - T28N - R12W
API: 30-045-11630

Prior Steel 95 BGT (SW/DB)
(Separator/Compressor)

Remedial Excavation
14' x 14' x 8' Deep

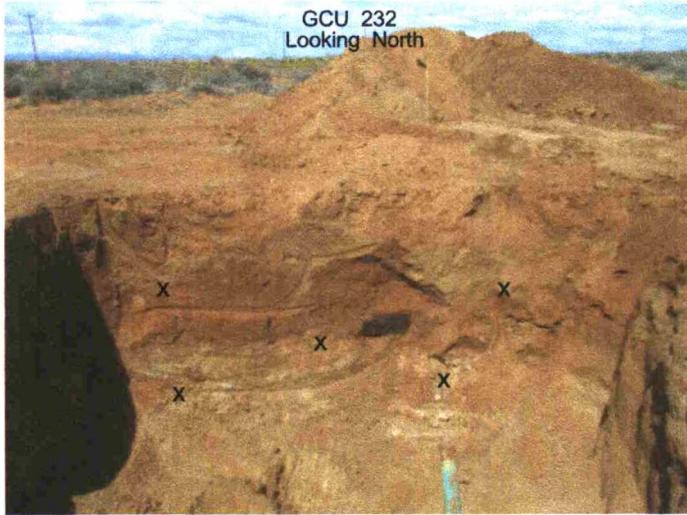
Separator

Compressor





GCU 232
Looking North





GCU 232
Looking East





Analytical Report

Report Summary

Client: BP America Production Co.

Samples Received: 4/12/2019

Job Number: 03143-0424

Work Order: P904054

Project Name/Location: GCU 232

Report Reviewed By:



Date: 4/15/19

Walter Hinchman, Laboratory Director



Envirotech Inc. certifies the test results meet all requirements of TNI unless footnoted otherwise.

Statement of Data Authenticity: Envirotech, Inc, attests the data reported has not been altered in any way.

Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech, Inc.

Envirotech, Inc, currently holds the appropriate and available Utah TNI certification NM009792018-1 for the data reported.

BP America Production Co. PO Box 22024 Tulsa OK, 74121-2024	Project Name: GCU 232 Project Number: 03143-0424 Project Manager: Sabre Beebe	Reported: 04/15/19 12:18
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Analytical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
Base 5-pt @ 8'	P904054-01A	Soil	04/12/19	04/12/19	Glass Jar, 4 oz.
North Wall 5-pt (3'-7')	P904054-02A	Soil	04/12/19	04/12/19	Glass Jar, 4 oz.
South Wall 5-pt (3'-7')	P904054-03A	Soil	04/12/19	04/12/19	Glass Jar, 4 oz.
East Wall 5-pt (3'-7')	P904054-04A	Soil	04/12/19	04/12/19	Glass Jar, 4 oz.
West Wall 5-pt (3'-7')	P904054-05A	Soil	04/12/19	04/12/19	Glass Jar, 4 oz.

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BP America Production Co.	Project Name: GCU 232	
PO Box 22024	Project Number: 03143-0424	Reported:
Tulsa OK, 74121-2024	Project Manager: Sabre Beebe	04/15/19 12:18

**Base 5-pt @ 8'
P904054-01 (Solid)**

Reporting

Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Antons by 300.0/9056A									
Chloride	131	20.0	mg/kg	1	1915044	04/12/19	04/12/19	EPA 300.0/9056A	

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BP America Production Co. PO Box 22024 Tulsa OK, 74121-2024	Project Name: GCU 232 Project Number: 03143-0424 Project Manager: Sabre Beebe	Reported: 04/15/19 12:18
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**North Wall 5-pt (3'-7')
P904054-02 (Solid)**

Reporting									
Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes

Anions by 300.0/9056A

Chloride	ND	20.0	mg/kg	1	1915044	04/12/19	04/12/19	EPA 300.0/9056A	
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BP America Production Co.	Project Name:	GCU 232	
PO Box 22024	Project Number:	03143-0424	Reported:
Tulsa OK, 74121-2024	Project Manager:	Sabre Beebe	04/15/19 12:18

**South Wall 5-pt (3'-7')
P904054-03 (Solid)**

Reporting

Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Anions by 300.0/9056A									
Chloride	27.2	20.0	mg/kg	1	1915044	04/12/19	04/12/19	EPA 300.0/9056A	

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BP America Production Co.	Project Name:	GCU 232	
PO Box 22024	Project Number:	03143-0424	Reported:
Tulsa OK, 74121-2024	Project Manager:	Sabre Beebe	04/15/19 12:18

**East Wall 5-pt (3'-7')
P904054-04 (Solid)**

Reporting

Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Anions by 300.0/9056A									
Chloride	ND	20.0	mg/kg	1	1915044	04/12/19	04/12/19	EPA 300.0/9056A	

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BP America Production Co. PO Box 22024 Tulsa OK, 74121-2024	Project Name: GCU 232 Project Number: 03143-0424 Project Manager: Sabre Beebe	Reported: 04/15/19 12:18
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**West Wall 5-pt (3'-7')
P904054-05 (Solid)**

Reporting

Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Anions by 300.0/9056A									
Chloride	ND	20.0	mg/kg	1	1915044	04/12/19	04/12/19	EPA 300.0/9056A	

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BP America Production Co. PO Box 22024 Tulsa OK, 74121-2024	Project Name: GCU 232 Project Number: 03143-0424 Project Manager: Sabre Beebe	Reported: 04/15/19 12:18
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Anions by 300.0/9056A - Quality Control
Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 1915044 - Anion Extraction EPA 300.0/9056A

Blank (1915044-BLK1)				Prepared & Analyzed: 04/12/19 1						
Chloride	ND	20.0	mg/kg							
LCS (1915044-BS1)				Prepared & Analyzed: 04/12/19 1						
Chloride	256	20.0	mg/kg	250		103	90-110			
Matrix Spike (1915044-MS1)				Source: P904054-01		Prepared & Analyzed: 04/12/19 1				
Chloride	387	20.0	mg/kg	250	131	102	80-120			
Matrix Spike Dup (1915044-MSD1)				Source: P904054-01		Prepared: 04/12/19 1 Analyzed: 04/12/19 2				
Chloride	395	20.0	mg/kg	250	131	105	80-120	1.90	20	

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BP America Production Co.	Project Name:	GCU 232	Reported: 04/15/19 12:18
PO Box 22024	Project Number:	03143-0424	
Tulsa OK, 74121-2024	Project Manager:	Sabre Beebe	

Notes and Definitions

- DET Analyte DETECTED
- ND Analyte NOT DETECTED at or above the reporting limit
- NR Not Reported
- RPD Relative Percent Difference
- ** Methods marked with ** are non-accredited methods.

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Client: <u>Bpx Energy</u>		Report Attention		Lab Use Only		TAT		EPA Program					
Project: <u>GOU 232</u>		Report due by: <u>4/15/2019</u>		Lab WO# <u>P 904054</u>		Job Number <u>03143-0424</u>		1D	3D	RCRA	CWA	SDWA	
Project Manager: <u>SABRE BEEBE</u>		Attention: <u>Sabre Beebe / Jeff Blyg / [unclear]</u>		Address:		Analysis and Method		State					
Address:		Address:		City, State, Zip		City, State, Zip		NM	CO	UT	AZ		
City, State, Zip		City, State, Zip		Phone:		Phone:		X					
Email:		Email:		DRO/ORO by 8015		GRO/DRO by 8015		BTEX by 8021		VOC by 8260		Metals 6010	
				Chloride 300.0		TPH 418.1							

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	Chloride 300.0	TPH 418.1	Remarks
1440	4/12/2019	SOIL	1	BASE 5-pt @ 8'	1						X		
1509			1	North Wall 5-pt (3'-7')	2						X		
1459			1	South Wall 5-pt (3'-7')	3						X		
1455			1	East Wall 5-pt (3'-7')	4						X		
1505			1	West Wall 5-pt (3'-7')	5						X		

Additional Instructions: Bill Bpx contact Sabre Beebe for P.O. vis ice in cooler

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: Jeff Blyg

Relinquished by: (Signature) <u>Jeff Blyg</u>	Date <u>4/12/2019</u>	Time <u>16:38</u>	Received by: (Signature) <u>[Signature]</u>	Date <u>4/12/19</u>	Time <u>16:38</u>	Lab Use Only Received on ice: <u>Y</u> / N
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time	T1 _____ T2 _____ T3 _____
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 laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.

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5796 US Highway 64, Farmington, NM 87401

Three Springs - 65 Mercado Street, Suite 115, Durango, CO 81301

Ph: (505) 632-0615 Fr: (505) 632-1865

Ph: (970) 759-0615 Fr: (800) 367-1379

