

APPROVED

RICE *Operating Company*

112 West Taylor • Hobbs, New Mexico 88240

Phone: (575) 393-9174 • Fax: (575) 397-1471

April 1, 2021

Bradford Billings

New Mexico Oil Conservation Division

1220 So. St. Francis Drive

Santa Fe, New Mexico 87505

Review of 2020 Annual Groundwater Report: **Content satisfactory**

1. Continue sampling on a semi-annual schedule at a minimum
2. OCD pre-approves eliminating sulfate analysis from MW #1 this point forward
3. Submit summarized activities completed and their results in a 2021 Annual Report. Submittal to OCD expected no later than March 31, 2022.

RE: 2020 Annual Groundwater Report

Rice Operating Company – BD SWD System

BD H-35 Emergency Overflow Pit (AP-71): UL/H, Section 35, T22S, R37E

Mr. Billings:

ROC is the service provider (agent) for the BD Saltwater Disposal System and has no ownership of any portion of pipeline, well or facility. The BD SWD System is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

The site is located approximately 6.5 miles southeast of Eunice, New Mexico at UL/H, Section 35, T22S, R37E as shown on the Geographical Location Map. Groundwater sampling at the site indicated the depth to groundwater is approximately 44 ft below ground surface (bgs).

One monitoring well was installed on December 21st, 2005, following the approval of the Investigation and Characterization Work Plan on November 9th, 2004. The well has been sampled regularly since installation. The most recent sampling event resulted in a chloride concentration of 1,540 mg/L in MW-1. In 2020, ROC received NMOCD approval to temporarily reduce the sampling interval to semi-annual. ROC will begin quarterly sampling in 2021.

Attached is the Appendix, which contains:

1. A Geographical Location Map.
2. A map showing well locations.
3. A table presenting all laboratory results and depth to groundwater for MW-1, and a graph showing recent laboratory results.
4. The laboratory analytical results for 2020.

Rice Operating Company appreciates the opportunity to work with you on this project. Please contact me at (575) 393-9174 or Edward Hansen at (505) 920-4965 if you have any questions or wish to further discuss this site. Thank you for your time and consideration.

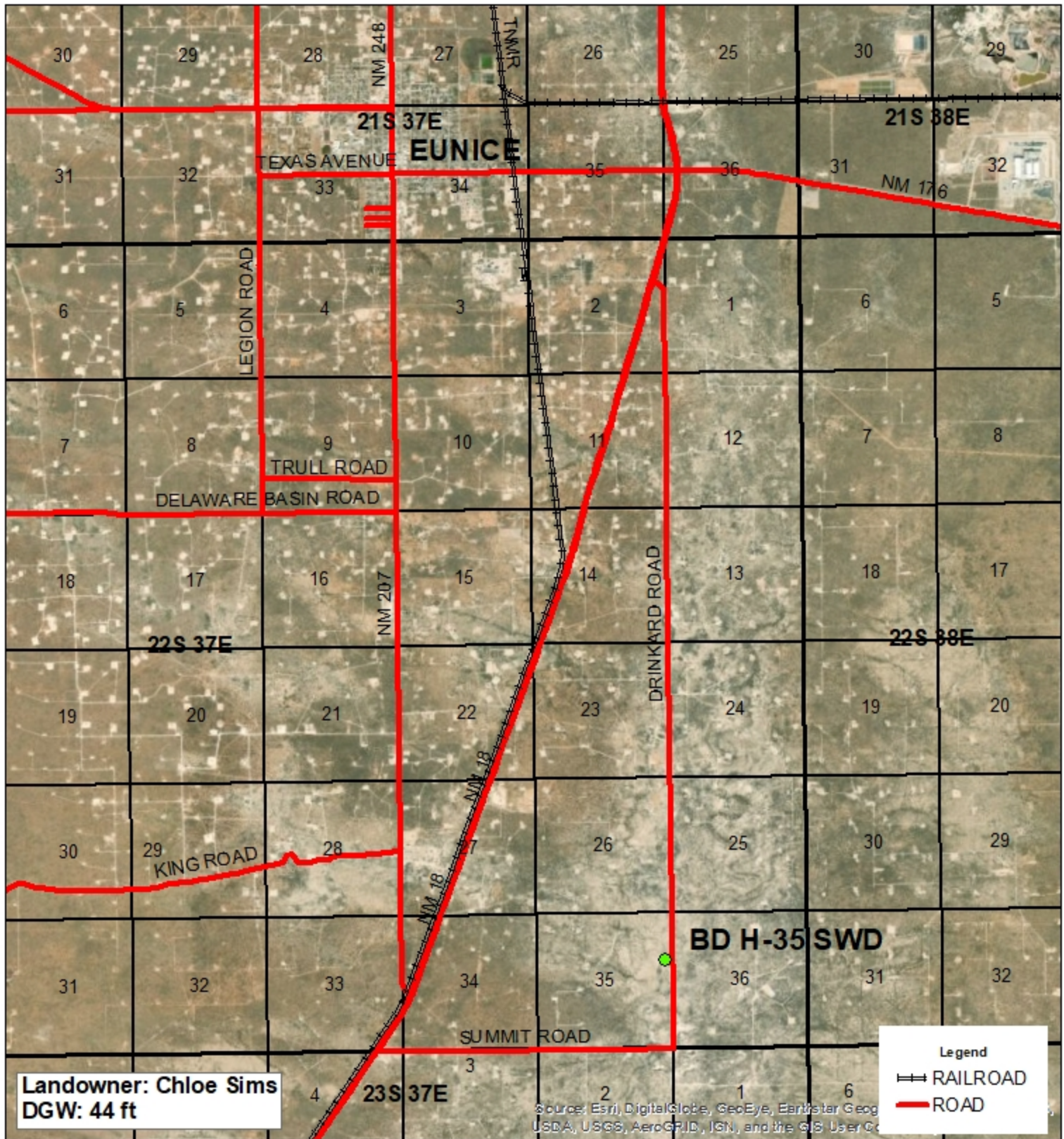
Sincerely,

A handwritten signature in black ink that reads "Katie Davis". The signature is written in a cursive, flowing style.

Katie Davis
Environmental Manager
RICE Operating Company (ROC)

Cc – Edward J. Hansen (ROC)

appendix



Landowner: Chloe Sims
 DGW: 44 ft

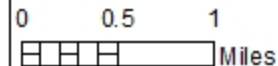
Legend
 RAILROAD
 ROAD

**BD H-35 SWD
 EMERGENCY
 OVERFLOW PIT**

AP-71

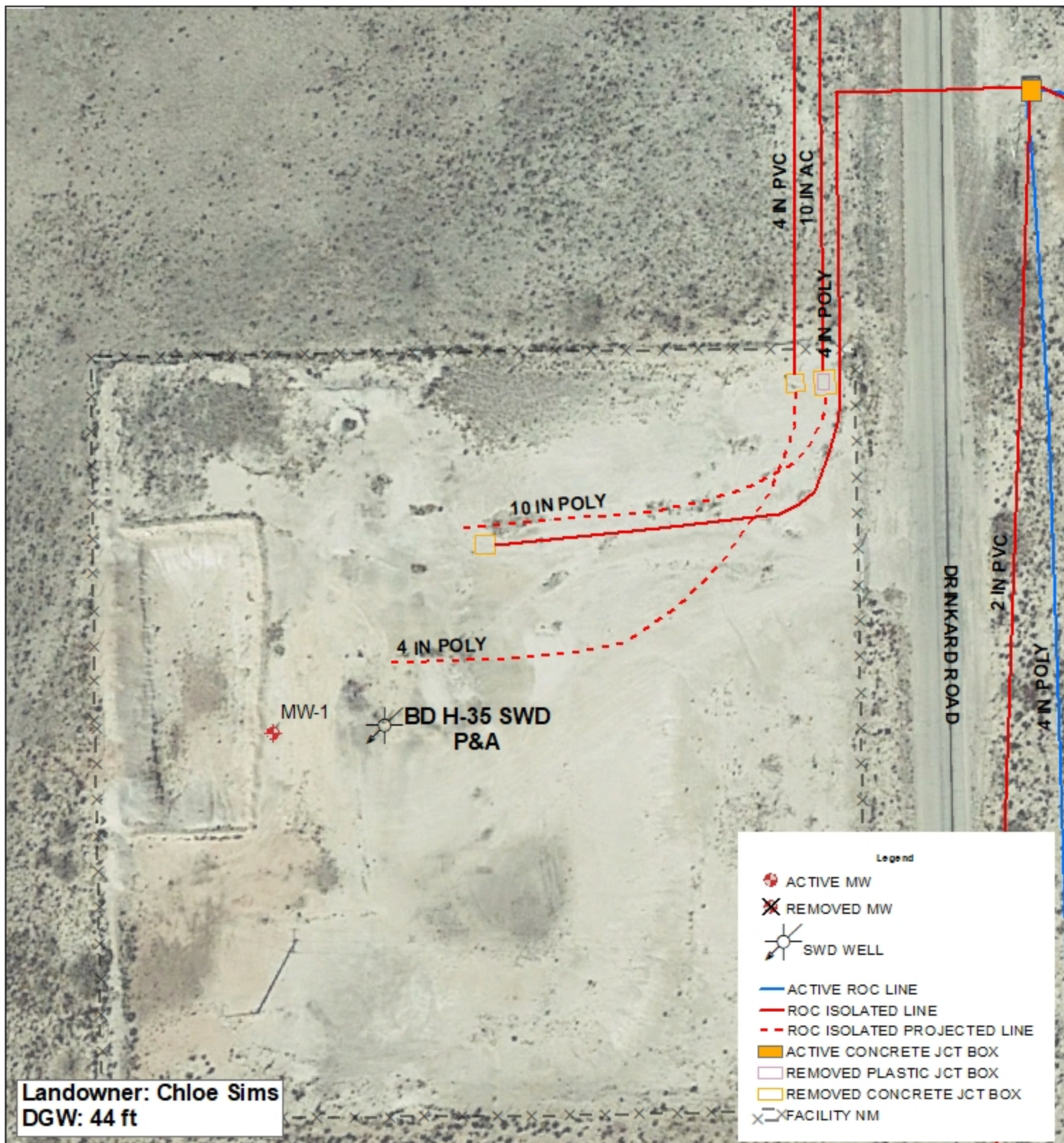
UL H SECTION 35
 T-22-S R-37-E
 LEA COUNTY, NM

GPS: 32.350497 -103.125984
 NAD 83 STATE PLANE PROJ
 NM EAST ZONE



Drawing date: 31/28/20
 Drafted by: T. Grieco





Landowner: Chloe Sims
DGW: 44 ft

Legend

- ACTIVE MW
- REMOVED MW
- SWD WELL
- ACTIVE ROC LINE
- ROC ISOLATED LINE
- ROC ISOLATED PROJECTED LINE
- ACTIVE CONCRETE JCT BOX
- REMOVED PLASTIC JCT BOX
- REMOVED CONCRETE JCT BOX
- FACILITY NM



**BD H-35 SWD
EMERGENCY
OVERFLOW PIT**

AP-71

UL H SECTION 35
T-22-S R-37-E
LEA COUNTY, NM

GPS: 32.350497 -103.125984
NAD 83 STATE PLANE PROJ
NM EAST ZONE

0 25 50
 Feet

Drawing date: 2/3/20
Drafted by: T. Grieco

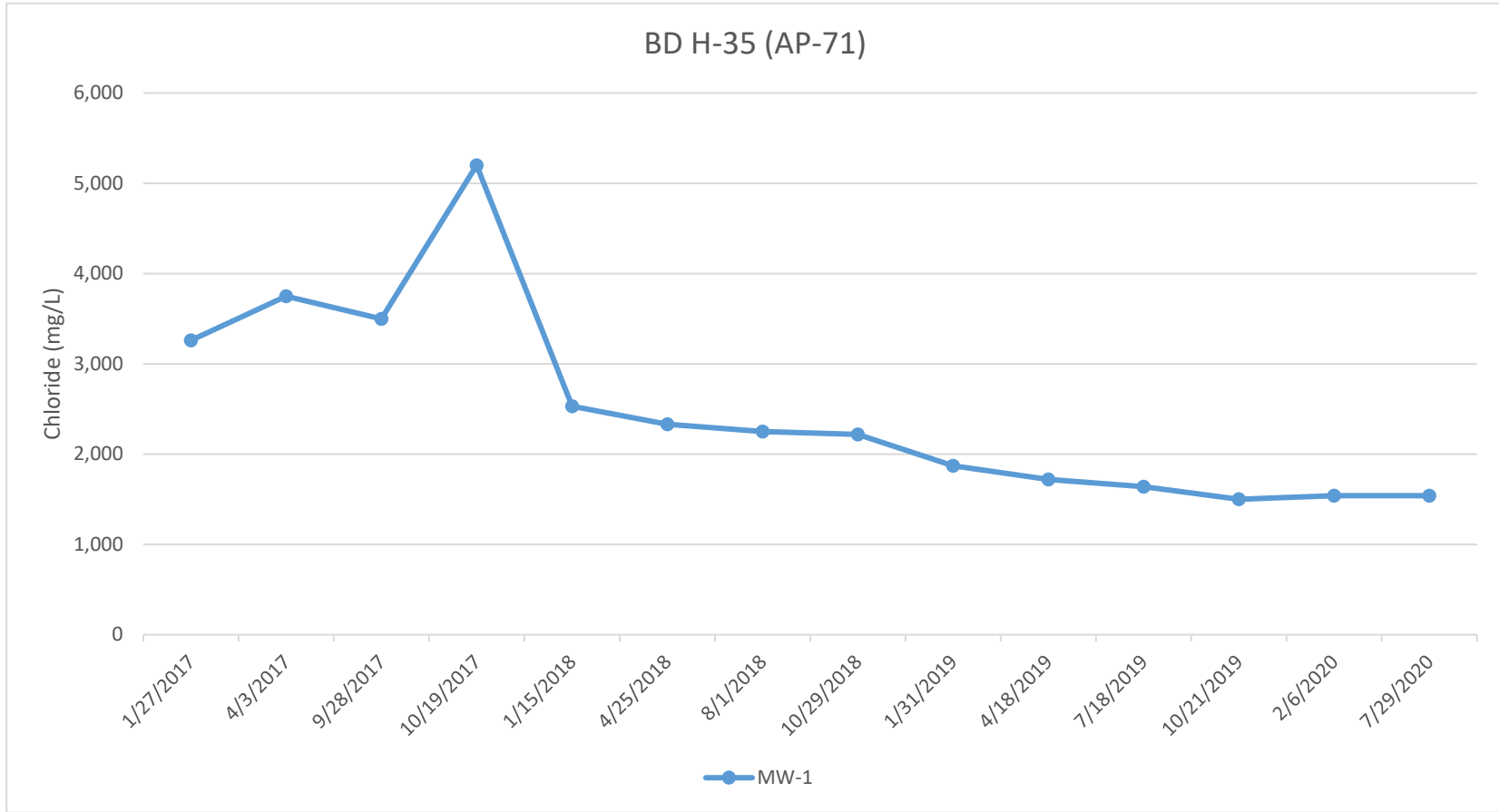
ROC - BD H-35 (AP-71)

Unit Letter H, Section 35, T22S, R37E

MW	Depth to Water	Total Depth	Well Volume	Volume Purged	Sample Date	Cl	TDS	Benzene	Toluene	Ethyl Benzene	Total Xylenes	Sulfate	Comments
1	43.64	57.2	8.8	30	1/4/2006	1,880	4,290	<0.001	<0.001	<0.001	<0.001	383	Clear No odor
1	43.79	57.2	8.7	30	4/24/2006	2,360	5,380	<0.001	<0.001	<0.001	<0.001	405	XXX
1	43.92	57.2	8.6	35	7/19/2006	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
1	43.83	57.2	8.7	30	10/11/2006	2,880	7,460	<0.001	<0.001	<0.001	<0.001	561	Clear
1	44.1	57.16	8.5	30	1/25/2007	3,240	5,300	<0.001	<0.001	<0.001	<0.001	556	XXX
1	44.2	57.16	8.4	30	4/4/2007	3,220	8,680	<0.001	<0.001	<0.001	<0.001	381	XXX
1	43.99	57.16	8.6	30	8/24/2007	4,749	12,345	0.003	0.003	0.003	0.008	565	Clear No odor
1	44.13	57.16	8.5	30	10/31/2007	3,400	7,028	<0.002	<0.002	<0.002	<0.006	499	Clear No odor
1	44.22	57.2	8.4	30	1/15/2008	4,800	9,194	<0.001	<0.001	<0.001	<0.003	665	Clear No odor
1	44.26	57.2	8.4	30	4/7/2008	4,600	9,350	<0.001	<0.001	<0.001	<0.003	888	Clear No odor
1	44.34	57.2	8.4	30	7/22/2008	4,400	9,580	<0.002	<0.002	<0.002	<0.006	714	Clear No odor
1	44.4	57.2	8.3	30	10/2/2008	3,950	9,350	<0.001	<0.001	<0.001	<0.003	675	Clear No odor
1	44.47	57.2	8.3	30	1/14/2009	3,650	7,600	<0.001	<0.001	<0.001	<0.003	657	Clear No odor
1	44.52	57.2	8.2	30	4/14/2009	3,400	6,550	<0.001	<0.001	<0.001	<0.003	629	Clear No odor
1	44.56	57.23	8.2	30	7/13/2009	2,380	4,800	<0.001	<0.001	<0.001	<0.003	522	Clear No odor
1	44.62	57.23	8.2	30	10/7/2009	3,050	6,900	<0.001	<0.001	<0.001	<0.003	519	Clear No odor
1	44.66	57.23	8.2	30	1/13/2010	3,050	6,300	<0.001	<0.001	<0.001	<0.003	490	Clear No odor
1	44.68	57.23	8.2	30	4/9/2010	2,850	5,480	<0.001	<0.001	<0.001	<0.003	618	Clear No odor
1	44.6	57.23	8.2	30	7/9/2010	2,650	4,970	<0.001	<0.001	<0.001	<0.003	526	Clear No odor
1	44.55	57.23	8.2	30	10/7/2010	2,750	6,430	<0.001	<0.001	<0.001	<0.003	512	Clear No odor
1	44.76	57.24	8.1	30	1/13/2011	2,650	5,160	<0.001	<0.001	<0.001	<0.003	598	Clear No odor
1	44.77	57.24	8.1	30	4/11/2011	3,050	5,480	<0.001	<0.001	<0.001	<0.003	567	Clear No odor
1	44.86	57.24	8	30	7/13/2011	4,050	6,590	<0.001	<0.001	<0.001	<0.003	597	Clear No odor
1	44.94	57.24	8	30	10/12/2011	3,400	5,890	<0.001	<0.001	<0.001	<0.003	607	Clear No odor
1	44.99	57.24	8	30	1/17/2012	2,470	5,070	<0.001	<0.001	<0.001	<0.003	558	Clear No odor
1	45.08	57.24	7.9	30	4/16/2012	2,570	5,100	<0.001	<0.001	<0.001	<0.003	437	Clear No odor
1	45.1	57.24	7.9	30	7/12/2012	2,430	4,940	<0.001	<0.001	<0.001	<0.003	504	Clear No odor
1	45.12	57.24	7.9	30	10/4/2012	2,700	5,380	<0.001	<0.001	<0.001	<0.003	615	Clear No odor
1	45.18	57.24	7.8	30	1/7/2013	2,200	4,290	<0.001	<0.001	<0.001	<0.003	501	Clear No odor

ROC - BD H-35 (AP-71)
Unit Letter H, Section 35, T22S, R37E

MW	Depth to Water	Total Depth	Well Volume	Volume Purged	Sample Date	Cl	TDS	Benzene	Toluene	Ethyl Benzene	Total Xylenes	Sulfate	Comments
1	45.25	57.24	7.8	30	4/18/2013	2,080	4,100	<0.001	<0.001	<0.001	<0.003	504	Clear No odor
1	45.24	57.24	7.8	30	7/15/2013	1,980	4,240	XXX	XXX	XXX	XXX	456	Clear No odor
1	45.32	57.24	7.7	30	10/16/2013	1,800	4,080	XXX	XXX	XXX	XXX	418	Clear No odor
1	45.37	57.24	7.7	30	1/15/2014	2,000	3,680	XXX	XXX	XXX	XXX	401	Clear No odor
1	45.44	57.24	7.7	30	4/4/2014	1,970	3,890	XXX	XXX	XXX	XXX	363	Clear No odor
1	45.45	57.24	7.7	30	7/15/2014	1,660	4,360	XXX	XXX	XXX	XXX	224	Clear No odor
1	42.22	57.24	9.8	100	12/16/2014	13,800	24,600	XXX	XXX	XXX	XXX	1610	Clear No odor
1	42.19	57.24	9.8	100	1/30/2015	9,600	16,800	XXX	XXX	XXX	XXX	1110	Clear No odor
1	42.47	57.24	9.6	100	4/20/2015	6,700	12,700	XXX	XXX	XXX	XXX	629	Clear No odor
1	42.18	57.24	9.79	100	7/20/2015	5,900	10,800	XXX	XXX	XXX	XXX	497	Clear No odor
1	43.03	57.24	9.24	100	10/21/2015	5,800	11,000	XXX	XXX	XXX	XXX	621	Clear No odor
1	43.08	57.24	9.2	100	1/27/2016	6,400	11,000	XXX	XXX	XXX	XXX	644	Clear No odor
1	43.26	57.24	9.1	100	4/20/2016	5,400	9,600	XXX	XXX	XXX	XXX	586	Clear No odor
1	43.39	57.24	9.1	100	7/20/2016	5,000	9,960	XXX	XXX	XXX	XXX	615	Clear No odor
1	43.25	57.24	9.1	100	10/19/2016	4,600	8,180	XXX	XXX	XXX	XXX	765	Clear No odor
1	43.43	57.24	8.9	100	1/27/2017	3,260	7,210	XXX	XXX	XXX	XXX	755	Clear No odor
1	43.48	57.24	8.9	100	4/3/2017	3,750	6,550	XXX	XXX	XXX	XXX	678	Clear No odor
1	43.47	57.24	9	100	9/28/2017	3,500	7,160	XXX	XXX	XXX	XXX	690	Clear No odor
1	43.46	57.24	9	100	10/19/2017	5,200	9,020	XXX	XXX	XXX	XXX	332	Clear No odor
1	43.45	57.24	9	100	1/15/2018	2,530	5,310	XXX	XXX	XXX	XXX	632	Clear No odor
1	43.92	57.24	8.7	100	4/25/2018	2,330	4,980	XXX	XXX	XXX	XXX	528	Clear No odor
1	44.03	57.24	8.6	100	8/1/2018	2,250	4,620	XXX	XXX	XXX	XXX	493	Clear No odor
1	44.07	57.24	8.6	100	10/29/2018	2,220	3,900	XXX	XXX	XXX	XXX	469	Clear No odor
1	44.08	57.24	9	100	1/31/2019	1,870	3,600	XXX	XXX	XXX	XXX	408	Clear No odor
1	44.2	57.24	9	100	4/18/2019	1,720	3,610	XXX	XXX	XXX	XXX	461	Clear No odor
1	44.27	57.24	9	100	7/18/2019	1,640	3,570	XXX	XXX	XXX	XXX	495	Clear No odor
1	44.33	57.24	9	100	10/21/2019	1,500	3,070	XXX	XXX	XXX	XXX	452	Clear No odor
1	44.46	57.24	8.3	100	2/6/2020	1,540	3,080	XXX	XXX	XXX	XXX	391	Clear No odor
1	44.62	57.24	8.2	100	7/29/2020	1,540	3,130	XXX	XXX	XXX	XXX	360	Clear No odor





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

February 14, 2020

KATIE JONES

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: BD H-35 SWD

Enclosed are the results of analyses for samples received by the laboratory on 02/10/20 14:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-19-12. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene".

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

Rice Operating Company
 KATIE JONES
 112 W. Taylor
 Hobbs NM, 88240
 Fax To: (575) 397-1471

Received:	02/10/2020	Sampling Date:	02/06/2020
Reported:	02/14/2020	Sampling Type:	Water
Project Name:	BD H-35 SWD	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	T22S R37E SEC35 H-LEA CTY., NM		

Sample ID: MONITOR WELL #1 (H000396-01)

Chloride, SM4500Cl-B		mg/L		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride*	1540	4.00	02/11/2020	ND	104	104	100	3.92	
Sulfate 375.4		mg/L		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Sulfate*	391	50.0	02/13/2020	ND	19.8	99.2	20.0	4.70	
TDS 160.1		mg/L		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
TDS*	3080	5.00	02/13/2020	ND	297	99.0	300	1.28	

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager



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

Notes and Definitions

- QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- ** Samples not received at proper temperature of 6°C or below.
- *** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager

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

Cardinal Laboratories, Inc.

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

LAB Order ID # _____

Company Name: RICE Operating Company	BILL TO Company: RICE Operating Company	PO#
Project Manager: Katie Jones	Address: (Street, City, Zip) 122 W Taylor Street ~ Hobbs, New Mexico 88240	
Address: (Street, City, Zip) 122 W Taylor Street ~ Hobbs, New Mexico 88240	Phone#: (575) 393-9174	Fax#: (575) 397-1471
Phone #: (575) 393-9174	Fax #: (575) 397-1471	
Project #: _____	Project Name: BD H-35 SWD	
Project Location: T22S R37E Sec35 H ~ Lea County New Mexico	Sampler Signature: Rozanne Johnson (575)631-9310	

ANALYSIS REQUEST (Circle or Specify Method No.)

LAB # (LAB USE ONLY)	FIELD CODE	(G)rab or (C)omp	# CONTAINERS	MATRIX				PRESERVATIVE METHOD					SAMPLING		
				WATER	SOIL	AIR	SLUDGE	HCL (2.40ml VOA)	HNO ₃	NaHSO ₄	H ₂ SO ₄	ICE (1-1.1liter HDPE)	NONE	DATE (2020)	TIME
H000396	Monitor Well #1	G	1	X								1	2/6	14:05	

MTBE 8021B/602	
BTEX 8021B/602	
TPH 418.1/TX1005 / TX1005 Extended (C3E)	
PAH 8270C	
Total Metals Ag As Ba Cd Cr Pb Se Hg 6010B/200.7	
TCLP Metals Ag As Ba Cd Cr Pb Se Hg	
TCLP Volatiles	
TCLP Semi Volatiles	
TCLP Pesticides	
RCI	
GC/MS Vol. 8260B/624	
GC/MS Semi. Vol. 8270C/625	
PCB's 8082/608	
Pesticides 8081A/608	
BOD, TSS, pH	
Moisture Content	
Anions (Cl, SO ₄ , CO ₃ , HCO ₃)	
Cations (Ca, Mg, Na, K)	
Sulfates (SO ₄)	X
Total Dissolved Solids	X
Chlorides	X
Turn Around Time ~ 24 Hours	

Relinquished by: Rozanne Johnson Date: 2/10/20 Time: 14:00	Received by: Rozanne Johnson Date: 2-10-20 Time: 14:00
Relinquished by: _____ Date: _____ Time: _____	Received By: (Laboratory Staff) _____ Date: _____ Time: _____
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	Sample Condition Cool: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Intact: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
	CHECKED BY: _____ (Initials) YS

Phone Results	Yes	No
Fax Results	Yes	No
REMARKS: Email Results: kiones@riceswd.com rozanne11@windstream.net		



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

August 10, 2020

KATIE JONES

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: BD H-35 SWD

Enclosed are the results of analyses for samples received by the laboratory on 08/04/20 14:45.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-20-13. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

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Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

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Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene".

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

Rice Operating Company
 KATIE JONES
 112 W. Taylor
 Hobbs NM, 88240
 Fax To: (575) 397-1471

Received:	08/04/2020	Sampling Date:	07/29/2020
Reported:	08/10/2020	Sampling Type:	Water
Project Name:	BD H-35 SWD	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	T22S R37E SEC35 H-LEA CTY., NM		

Sample ID: MONITOR WELL #1 (H002009-01)

Chloride, SM4500Cl-B		mg/L		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride*	1540	4.00	08/05/2020	ND	104	104	100	3.92		
Sulfate 375.4		mg/L		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Sulfate*	360	50.0	08/06/2020	ND	17.7	88.3	20.0	1.02	QM-07	
TDS 160.1		mg/L		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
TDS*	3130	5.00	08/06/2020	ND	545	109	500	1.77		

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager



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

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- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager

District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720
District II
 811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720
District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
 1220 S. St Francis Dr., Santa Fe, NM 87505
 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 23947

CONDITIONS

Operator: RICE OPERATING COMPANY 122 W Taylor Hobbs, NM 88240	OGRID: 19174
	Action Number: 23947
	Action Type: [UF-GWA] Ground Water Abatement (GROUND WATER ABATEMENT)

CONDITIONS

Created By	Condition	Condition Date
nvelez	Review of 2020 Annual Groundwater Report: Content satisfactory 1. Continue sampling on a semi-annual schedule at a minimum 2. OCD pre-approves eliminating sulfate analysis from MW #1 this point forward 3. Submit summarized activities completed and their results in a 2021 Annual Report. Submittal to OCD expected no later than March 31,2022.	2/4/2022