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July 11, 2022

Mr. Robert Hamlet  
Environmental Science & Specialist  
New Mexico Energy, Minerals and Natural Resources Department – Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

**Re: Revised Site Assessment Summary & Proposed Variance and Remediation Workplan Addendum  
SRO 5 State Com #506H & 507H  
NMOCD Incident No. nRM1933644528  
Unit I/L, Section 32/33, Township 25S, Range 28E  
Latitude 32.08505, Longitude -104.10065  
Eddy County, New Mexico**

Dear Mr. Hamlet:

On behalf of ConocoPhillips (COP), TRC Environmental Corporation (TRC) is providing this Revised Site Assessment Summary & Proposed Variance and Remediation Workplan Addendum (Addendum) for COP's SRO 5 State #506H & 507H (Site). The *Revised Site Assessment Summary & Proposed Variance and Remediation Workplan* for the Site was submitted to the New Mexico Oil Conservation Division (NMOCD) in early December 2021. The document proposed the following remedial actions to address soil with chloride concentrations above NMOCD Closure Criteria:

- Excavation and removal of soils on the north end (Areas 1 through 6) of the Site will occur to the 600 milligrams per kilogram (mg/kg) chloride limit.
- Excavation and removal of soils on the south end (Areas 7 and 8) of the Site will occur to approximately four (4) feet bgs and install a 20-mil liner in the excavation bottom.
- Confirmation sidewall samples will be collected on a five hundred (500) square foot basis. The chloride limit for all sidewalls will be 600 mg/kg.
- Confirmation floor samples will be collected on a five hundred (500) square foot basis in Areas 1 through 6. No floor samples will be collected from the area to be lined (Areas 7 and 8). The limit for chloride concentrations in Areas 1 through 6 will be 600 mg/kg.
- Clean overburden excavated from the surface will be mixed to homogenize the stockpile atop plastic and sampled via 5-point composite for chloride concentrations on a fifty (50) cubic yard (cy) basis. If chloride concentrations are below 600 mg/kg, the soil will be re-used for backfilling. If composite samples exceed 600 mg/kg chloride, the material will be transported offsite to a proper disposal facility.
- Three (3) additional monitor wells will be installed. The proposed easternmost well will be laterally moved northward to be in-line with MW-2; however, the well will not be located so far north that it is installed into the presumed alluvium or Rustler/alluvium transition.

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- Additional groundwater monitoring/sampling will be performed following the monitor wells installation to further investigate the groundwater underlying the Site.
- Additional clarification of the proposed schedule of activities, including soil remediation and groundwater monitoring.

The NMOCD provided denial of the December 2021 *Revised Site Assessment Summary & Proposed Variance and Remediation Workplan* on May 12, 2022, via the E-permitting portal. The NMOCD's denial e-mail indicated adherence to the most stringent closure criteria for the entirety of the Release Site, a sample frequency variance of one (1) confirmation soil sample per 500 square feet of floor and sidewall footprint, and overburden sample frequency of one (1) soil sample per 200 cubic feet. The monitoring wells were approved, but the easternmost water well was requested to be moved northward by approximately 150 feet.

A meeting was conducted between COP, NMOCD, and TRC on June 8, 2022, to discuss the December 2021 *Revised Site Assessment & Proposed Variance and Remediation Workplan* and NMOCD's May 12, 2022 denial. Based on the June 8, 2022 meeting and as summarized in TRC's June 10, 2022 e-mail to NMOCD, this Addendum includes the following changes to the remediation workplan presented in December 2021 Revised Site Assessment Summary & Proposed Variance and Remediation Workplan:

- An increase in confirmation soil sampling frequency from one (1) composite soil sample per 600 square feet (sidewalls) and one (1) composite soil sample per 1,000 square feet (floors) to one (1) composite soil sample per 500 cubic square feet for both floors and sidewalls.
- An increase in the 'clean overburden' sampling frequency from one (1) composite soil sample per 100 cy of 'clean overburden' material to one (1) composite soil sample per 50 cy of 'clean overburden' material.
- Installation of a 20-mil liner in Areas 7 and 8.
- Collection of one (1) additional 5-point composite sample from the base of each Area 7 & Area 8 prior to liner installation (requested in follow-up email after meeting by NMOCD).
- The easternmost monitoring well will be installed approximately 150 feet north of the previously proposed monitoring well location.

This Addendum addresses the above revisions to *the Revised Site Assessment & Proposed Variance and Remediation Workplan*. Additional details regarding the Addendum are provided below. The proposed excavation and off-Site disposal of soil within the Draw area (Areas 1 through 6) with chloride concentrations above the Closure Criterion will be conducted in accordance with Proposed Soils Workplan section of the *Revised Site Assessment & Proposed Variance and Remediation Workplan*.

## REMEDIATION WORKPLAN ADDENDUM

### Soil Remediation Activities

#### Distinction Between Areas 1 through 6 (Inside the Draw) and Areas 7 and 8 (Outside the Draw)



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Soil samples at multiple sample locations indicated chloride concentrations above NMOCD regulatory guidelines. COP has separated the site into two (2) distinct areas, based on differences in depth to water and background chloride concentration data.

The first distinct area is inside the draw, which appears to exhibit low background chloride concentrations. The majority of the site, primarily to the north, is located within this area. Soil sample locations which are representative of this area include TT-1, TT-2, TT-3, TT-4, TT-5, TT-6, TT-9, TT-10, TT-11, TT-12, TT-13, and TT-14. Background sample locations representative of this area include Background-3, Background-4, and SB-DTW. Figure 1 depicts Areas 1 through 6 as the area 'Inside the Draw'.

The second distinct area is on the draw margins and outside the draw. This area exhibits elevated background chloride concentrations and does not overlie groundwater within thirty (30) feet bgs. Soil sample locations which are representative of this area include TT-7, TT-15, and W-5. Background sample locations which are representative of this area include Background-1, Background-2, Background-5, Background-09162020, MW-1, and MW-2. Figure 1 depicts Areas 7 and 8 as the area 'Outside the Draw'.

## Overburden Use and Sampling

Soil samples at multiple sample locations indicate chloride concentrations have migrated below the surface, leaving an interval of 'clean overburden' material. COP proposes to utilize the 'clean overburden' for backfill material following further excavation of affected material below the overburden. COP will excavate and stage the 'clean overburden material' on plastic and mechanically homogenize utilizing onsite equipment. Following homogenization, COP proposes one five-point composite soil sample for every fifty (50) cy of excavated 'clean overburden' material. After review of the analytical results, the soil represented by soil samples exhibiting chloride concentrations below NMOCD regulatory guidelines will be staged pending utilization as backfill material following excavation activities. The soil represented by soil samples exhibiting chloride concentrations above NMOCD regulatory guidelines will be staged pending disposal at an NMOCD approved disposal facility.

## Areas 1 through 6 (Previously Described as 'Inside the Draw')

COP will excavate the soil in the draw area exhibiting chloride concentrations above 600 mg/kg, stage the soil on a polyvinyl liner, and dispose of the soil at an NMOCD approved disposal facility. The locations and intervals to be excavated for disposal are highlighted in orange on Table 1.

The area represented by soil sample location TT-1 will be excavated to an approximate depth of one (1) foot bgs.

The excavation in the area represented by soil sample location TT-3 will be excavated to a depth of approximately ten (10) feet bgs.

The excavation in the area represented by soil sample location TT-4 will be excavated to a depth of approximately eight (8) feet bgs.

The area represented by soil sample location TT-11 will be additionally excavated to a depth of approximately sixteen (16) feet bgs.

The area represented by soil sample location TT-12 will be excavated to a depth of approximately seven (7) feet bgs. Soil sample analytical results from the October 2019 and September 2020 sampling events



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utilizing a direct push and air rotary drilling methods indicate soil samples from the area represented by TT-12 collected during the September 2020 by trenching with a backhoe were likely anomalously high due to 'sluff' from affected soil at shallower horizons, and not representative of soil concentrations in the area. The floor of the excavation will be confirmed to be less than NMOCD regulatory guidelines during confirmation sampling.

The area represented by soil sample location TT-13 will be excavated to a depth of approximately six (6) feet bgs. Soil sample analytical results from the October 2019 and September 2020 sampling events utilizing a direct push and air rotary drilling methods indicate soil samples from the area represented by TT-13 collected during the September 2020 by trenching with a backhoe were likely anomalously high due to 'sluff' from affected soil at shallower horizons, and not representative of soil concentrations in the area. Soil sample SB-13A @ 9-10 exhibited a chloride concentration of 602 mg/kg, which is at the NMOCD regulatory limit and within laboratory margin of error. The floor of the excavation will be confirmed to be less than NMOCD regulatory guidelines during confirmation sampling.

The area represented by soil sample location TT-14 will be excavated to a depth of approximately three (3) feet bgs.

### **Areas 7 and 8 (Previously Described as 'Outside the Draw')**

COP proposes to excavate soil exhibiting chloride concentrations above NMOCD regulatory guidelines to a depth of approximately four (4) feet bgs to restore the 'root zone' and provide soil with low chloride concentrations to promote vegetation growth. The excavated soil not characterized as 'clean overburden' will be disposed of at an NMOCD approved disposal facility alongside the affected material excavated from the draw area.

Following excavation activities, a 20 mil polyvinyl liner will be installed at the base of the excavation. The liner is designed as an engineering control to protect groundwater from rainwater infiltration through soil with documented elevated chloride concentrations, regardless of the provenance of the elevated chloride concentrations.

### **Confirmation Sample Variance**

As part of collection of confirmation samples, COP proposes to:

- Collect one (1) five-point composite sidewall confirmation soil sample for every five hundred (500) square feet of excavated sidewall to ensure the lateral extent of the chloride-affected soil has been removed.
- Collect one (1) five-point composite floor confirmation soil sample for every five hundred (500) square feet of excavation floor to ensure the vertical extent of the chloride-affected soil has been removed. The excavation floor in the areas represented by trenches TT-7, TT-15, TT-16, and W-5 (Areas 7 and 8) will each have a single five-point composite sample to document the chloride concentrations below the liner and may exceed 600 mg/kg. These chloride concentrations are likely background concentrations and will not be further addressed by COP.

Confirmation soil samples collected from the sidewalls, floors, and 'clean overburden' will be submitted for chloride analysis only, as no soil samples collected during the delineation phase exhibited total petroleum



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hydrocarbon (TPH) or benzene, toluene, ethylbenzene, and total xylenes (BTEX) concentrations above the laboratory reporting limits (RLs), which are substantially lower than NMOCD regulatory guidelines.

## Estimated Volumes

The estimated volume of 'clean overburden' material is approximately 4,600 cy. The 'clean overburden' material will be utilized as backfill material following completion of excavation and sampling activities, as described above.

The total volume of material area exhibiting chloride concentrations above NMOCD regulatory guidelines will be staged onsite for disposal at an NMOCD approved disposal facility. The estimated volume of this affected material is approximately 15,600 cy, as follows:

- The volume of affected material from inside the draw (Areas 1 through 6) is estimated to be approximately 11,700 cy.
- The volume of affected material from outside the draw (Areas 7 and 8) between the surface and four (4) feet bgs is approximately 3,900 cy.

## Backfilling

Following confirmation soil sampling of the excavation sidewalls, floors, and 'clean overburden' and review of analytical results, the excavated area will be returned to grade with the 'clean overburden' material and locally sourced clean backfill material.

## Groundwater Sampling and Additional Well Installation

Quarterly groundwater monitoring is proposed at the Site as a conservative measure to monitor groundwater quality during implementation of the soil remedies and to further investigate any potential change in groundwater underlying the Release Site. Existing monitoring wells MW-1 through MW-3 will be gauged for depth to groundwater and sampled using low flow methodology for laboratory analysis of chloride by EPA Method 300.0 and TDS by Method SM 2540C, at a minimum. The monitoring results will be documented in annual groundwater monitoring reports to be prepared and submitted to NMOCD within 120 days of the end of each calendar year during which groundwater sampling occurs. Additionally, monitoring wells MW-4 through MW-6 will be included in the groundwater sampling events following installation. The schedule for quarterly groundwater monitoring activities is described below. Routine groundwater monitoring will be reevaluated upon completion of the soil remedies. If data indicate groundwater has not been affected by the release, groundwater monitoring will cease. If data indicate groundwater has been affected by the release, groundwater will require further measures under abatement.

## IMPLEMENTATION SCHEDULE

COP proposes the following schedule for implementation of the Revised Site Assessment Summary & Proposed Variance and Remediation Workplan Addendum, contingent upon approval from NMOCD:

- Initiate soil remediation activities and submit a Soil Remediation Activities Report within 150 days from NMOCD-approval of this Revised Site Assessment Summary & Proposed Variance and Remediation Workplan Addendum.



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- Initiate quarterly groundwater monitoring of the currently existing monitoring well network within 90 days of NMOCD-approval of this Revised Site Assessment Summary & Proposed Variance and Remediation Workplan Addendum.
- Installation of the additional monitoring wells at the approximate proposed locations and incorporation of the new wells within the groundwater monitoring plan within 90 days of well installation approval by both the New Mexico Office of the State Engineer (NMOSE) and New Mexico State Land Office (NMSLO – the landowner).

## CLOSING

If you should have any questions or comments regarding this project, please contact Ike Tavaréz of COP at (432) 701-8630 or Jared Stoffel of TRC at (432) 238-3003.

Sincerely,



Jared Stoffel, P.G.  
Project Manager

cc: Mike Bratcher, New Mexico Energy, Minerals, and Natural Resources Department, Artesia, New Mexico  
Bradford Billings, New Mexico Energy, Minerals, and Natural Resources Department, Albuquerque, New Mexico  
Ike Tavaréz, P.G., ConocoPhillips, Midland, Texas

### Attachments:

Figure 1 – Proposed Remedial Excavation and Liner Locations

Figure 2 – Proposed Monitoring Well Location Map

Table 1 – Summary of Soil Analytical Data

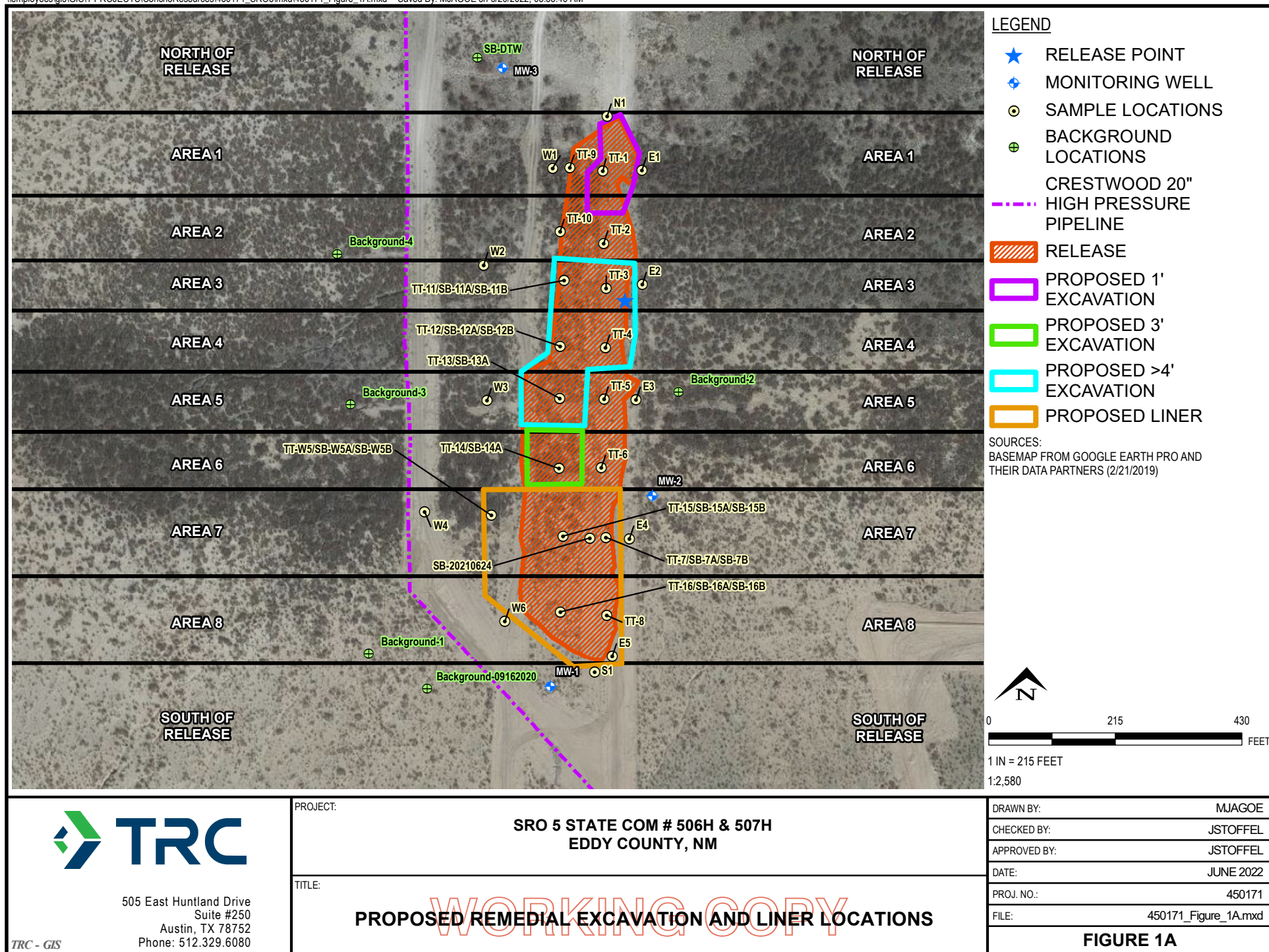
Appendix A – Copies of E-Mail Correspondence

Appendix B – NMOCD Form C-141



## **FIGURES**

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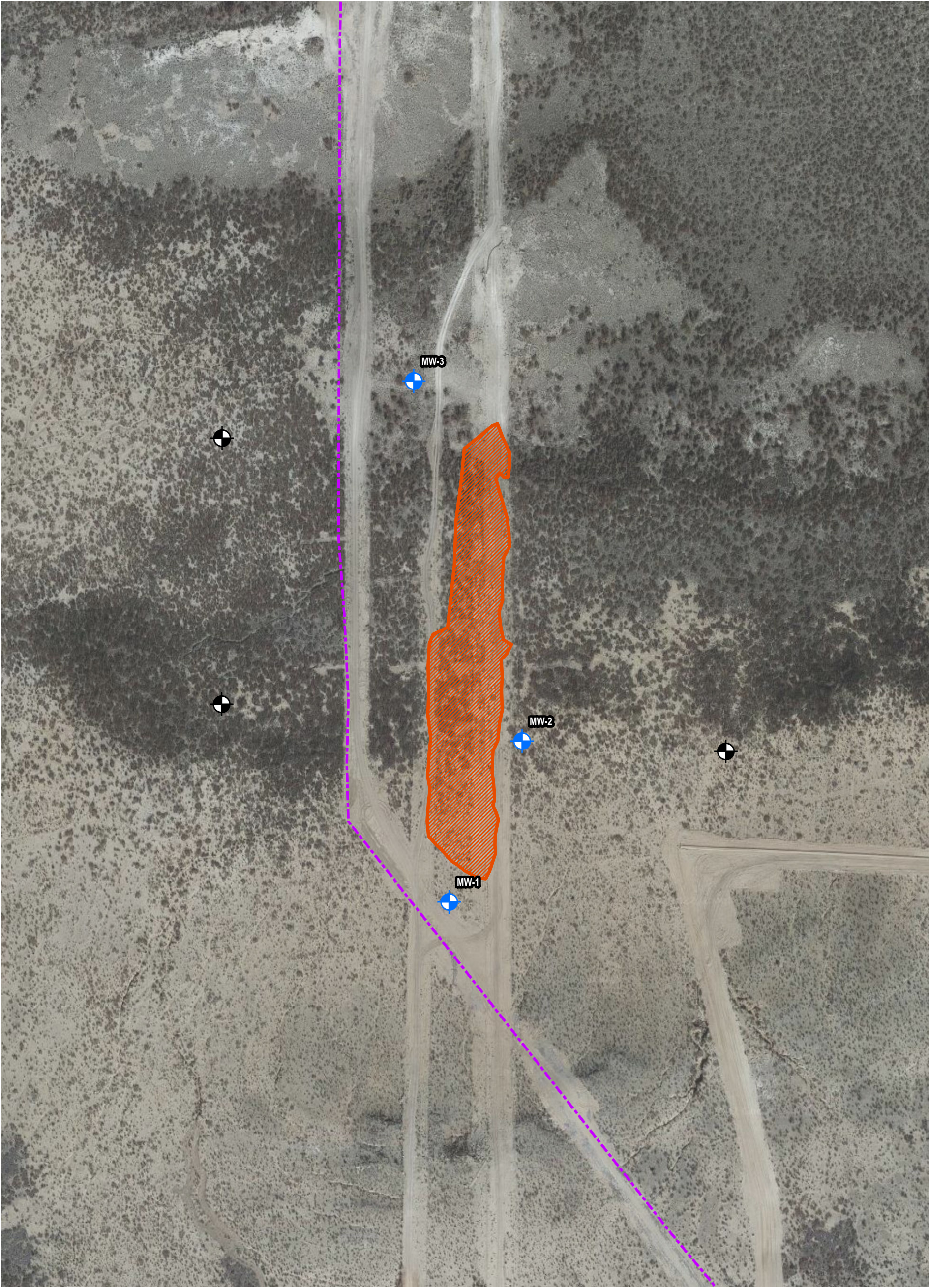
SRO 5 State Com #506H & 607H  
Figure 1B - North to South Cross-Section

Depth Below Ground Surface	SB-DTW	TT-9	TT-1	Background-4	TT-10	TT-2	TT-11	TT-3	TT-12	TT-4	Background-3	TT-13	TT-5	Background-2	TT-14	TT-6	TT-W5	TT-15	TT-7	Background-1	TT-16	TT-8	MW-1	Background-09162020	Background-5	Depth Below Ground Surface
NORTH END	North of Release	Area 1		Area 2			Area 3		Area 4		Area 5				Area 6		Area 7			Area 8			South of Release			SOUTH END
	West	West	East	West	West	East	West	East	West	East	West	West	East	East	West	East	West	Center	East	West	West	East	Center	Center	NorthWest	
0-1	376	25.5	686	8.44	5.1	35.1	167	155	14.4	231	8.99	6,980	19.5	24.6	3,220	48.0	322	3,830	2,890	39.0	273	39.3	22.8	6.0	10.3	0-1
2-3	64.6	<4.96	8.03	17.1	<5.05	128	509	294	11.3	476	11.2	14,600	36.0	41.6	2,040	105	1,020	2,120	1,180	358	383	349	-	735	50.7	2-3
3-4	-	<5.04	14.7	105	<5.04	248	-	385	-	860	9.04	-	93.6	46.4	-	129	-	-	-	427	-	373	-	-	59.8	3-4
4-5	135	<5.05	15.3	306	<5.00	42.7	1,660	703	1,370	1,110	25.8	776	205	305	110	281	2,260	1,910	1,720	722	82.5	346	206	1,260	114	4-5
5-6	-	<4.97	14.9	384	<4.99	<4.98	-	1,100	-	1,370	553	1,390	369	1,020	-	331	-	-	-	916	-	382	-	-	388	5-6
6-7	47.1	-	-	489	-	-	1,230	961	1,800	925	100	540	-	1,240	-	-	2,170	2,390	2,210	982	22.7	-	-	1,170	461	6-7
7-8	-	-	-	379	-	-	-	901	-	688	140	-	-	1,650	-	-	-	-	-	391	-	-	-	-	587	7-8
8-9	-	-	-	561	-	-	-	832	-	547	199	-	-	3,770	-	-	-	-	-	777	-	-	-	-	643	8-9
9-10	13.4	-	-	359	-	-	1,290	641	313	-	235	602	-	292	-	-	2,390	1,040	1,860	817	670	-	2,320	1,840	911	9-10
10-11	-	-	-	422	-	-	-	597	-	-	251	-	-	152	-	-	-	-	-	1,040	-	-	-	-	769	10-11
11-12	-	-	-	318	-	-	-	-	-	-	280	-	-	992	-	-	-	-	-	1,150	-	-	-	-	1,220	11-12
12-13	-	-	-	679	-	-	1,540	-	-	-	146	258	-	610	-	-	2,430	-	-	1,620	-	-	-	-	639	12-13
13-14	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	13-14
14-15	15.1	-	-	-	-	-	862	-	-	-	-	-	-	-	-	-	985	974	1,180	-	2,600	-	798	3,070	-	14-15
15-16	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	15-16
16-17	-	-	-	-	-	-	531	-	-	-	-	-	-	-	-	-	836	744	1,260	-	3,070	-	-	-	-	16-17
17-18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	17-18
18-19	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	483	173	1,340	-	1,700	-	-	-	-	18-19
19-20	10.6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,130	2,090	-	19-20
20-21	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	722	-	1,380	-	-	-	-	20-21
21-22	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,700	-	-	-	-	21-22
22-23	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	268	-	-	-	-	-	-	22-23
23-24	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,980	-	1,270	2,030	-	23-24
24-25	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	24-25
25-26	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	620	-	-	-	-	25-26
27-28	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	579	-	-	-	-	27-28
29-30	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	799	800	-	29-30

Most Recent Sampling Event

Sept. 2019






**LEGEND**  
 MONITORING WELL  
 PROPOSED ADDITIONAL MONITORING WELL  
 RELEASE AREA

BASEMAP FROM GOOGLE EARTH PRO AND THEIR DATA PARTNERS (2/21/2019)

0 190 380 FEET  
1" = 190'  
1:2,280

 505 East Huntland Drive Suite #250 Austin, TX 78752 Phone: 512.329.6080	PROJECT:	SRO 5 STATE COM # 506H & 507H EDDY COUNTY, NM	DRAWN BY:	MJAGOE
	TITLE:	PROPOSED MONITORING WELL LOCATION MAP	CHECKED BY:	JSTOFFEL
			APPROVED BY:	JSTOFFEL
			DATE:	JUNE 2022
			PROJ. NO.:	450171
			FILE:	450171_Figure_2.mxd
			FIGURE 2	

## **TABLES**

SRO 5 State Com # 506H & 507H											
TABLE 1											
Summary of Delineation Sampling Analytical Results											
Concentrations of BTEX, TPH, and/or Chloride in Soil											
Sample Location	Depth (ft.)	SW 846 8021B		SW 846 8015M Ext.					E 300		
		Benzene (mg/kg)	BTEX (mg/kg)	GRO C <sub>6</sub> -C <sub>10</sub> (mg/kg)	DRO C <sub>10</sub> -C <sub>28</sub> (mg/kg)	GRO + DRO C <sub>6</sub> -C <sub>28</sub> (mg/kg)	ORO C <sub>28</sub> - C <sub>35</sub> (mg/kg)	TPH C <sub>6</sub> - C <sub>35</sub> (mg/kg)	Chloride [September 2019] (mg/kg)	Chloride [October 2019] (mg/kg)	Chloride [September 2020] (mg/kg)
NMOCD Closure Criteria		10	50	-	-	-	-	100	600		
TT-1	0-1	<0.00200	<0.002	<49.8	<49.8	<49.8	<49.8	<49.8	686	-	-
TT-1	2-3	-	-	-	-	-	-	-	8.03	-	-
TT-1	3-4	-	-	-	-	-	-	-	14.7	-	-
TT-1	4-5	-	-	-	-	-	-	-	15.3	-	-
TT-1	5-6	-	-	-	-	-	-	-	14.9	-	-
TT-2	0-1	<0.00199	<0.00199	<49.8	<49.8	<49.8	<49.8	<49.8	35.1	-	-
TT-2	2-3	-	-	-	-	-	-	-	128	-	-
TT-2	3-4	-	-	-	-	-	-	-	248	-	-
TT-2	4-5	-	-	-	-	-	-	-	42.7	-	-
TT-2	5-6	-	-	-	-	-	-	-	<4.98	-	-
TT-3	0-1	<0.00198	<0.00198	<49.9	<49.9	<49.9	<49.9	<49.9	155	-	-
TT-3	2-3	-	-	-	-	-	-	-	294	-	-
TT-3	3-4	-	-	-	-	-	-	-	385	-	-
TT-3	4-5	-	-	-	-	-	-	-	703	-	-
TT-3	5-6	-	-	-	-	-	-	-	1,100	-	-
TT-3	6-7	-	-	-	-	-	-	-	961	-	-
TT-3	7-8	-	-	-	-	-	-	-	901	-	-
TT-3	8-9	-	-	-	-	-	-	-	832	-	-
TT-3	9-10	-	-	-	-	-	-	-	641	-	-
TT-3	10-11	-	-	-	-	-	-	-	597	-	-

TABLE 1											
Summary of Delineation Sampling Analytical Results											
Concentrations of BTEX, TPH, and/or Chloride in Soil											
Sample Location	Depth (ft.)	SW 846 8021B		SW 846 8015M Ext.					E 300		
		Benzene (mg/kg)	BTEX (mg/kg)	GRO C <sub>6</sub> -C <sub>10</sub> (mg/kg)	DRO C <sub>10</sub> -C <sub>28</sub> (mg/kg)	GRO + DRO C <sub>6</sub> -C <sub>28</sub> (mg/kg)	ORO C <sub>28</sub> - C <sub>35</sub> (mg/kg)	TPH C <sub>6</sub> - C <sub>35</sub> (mg/kg)	Chloride [September 2019] (mg/kg)	Chloride [October 2019] (mg/kg)	Chloride [September 2020] (mg/kg)
NMOCD Closure Criteria		10	50	-	-	-	-	100	600		
TT-4	0-1	<0.00199	<0.00199	<49.9	<49.9	<49.9	<49.9	<49.9	231	-	-
TT-4	2-3	-	-	-	-	-	-	-	476	-	-
TT-4	3-4	-	-	-	-	-	-	-	860	-	-
TT-4	4-5	-	-	-	-	-	-	-	1,110	-	-
TT-4	5-6	-	-	-	-	-	-	-	1,370	-	-
TT-4	6-7	-	-	-	-	-	-	-	925	-	-
TT-4	7-8	-	-	-	-	-	-	-	688	-	-
TT-4	8-9	-	-	-	-	-	-	-	547	-	-
TT-5	0-1	<0.00200	<0.002	<49.9	<49.9	<49.9	<49.9	<49.9	19.5	-	-
TT-5	2-3	-	-	-	-	-	-	-	36.0	-	-
TT-5	3-4	-	-	-	-	-	-	-	93.6	-	-
TT-5	4-5	-	-	-	-	-	-	-	205	-	-
TT-5	5-6	-	-	-	-	-	-	-	369	-	-
TT-6	0-1	<0.00199	<0.00199	<50.0	<50.0	<50.0	<50.0	<50	48.0	-	-
TT-6	2-3	-	-	-	-	-	-	-	105	-	-
TT-6	3-4	-	-	-	-	-	-	-	129	-	-
TT-6	4-5	-	-	-	-	-	-	-	281	-	-
TT-6	5-6	-	-	-	-	-	-	-	331	-	-

TABLE 1											
Summary of Delineation Sampling Analytical Results											
Concentrations of BTEX, TPH, and/or Chloride in Soil											
Sample Location	Depth (ft.)	SW 846 8021B		SW 846 8015M Ext.					E 300		
		Benzene (mg/kg)	BTEX (mg/kg)	GRO C <sub>6</sub> -C <sub>10</sub> (mg/kg)	DRO C <sub>10</sub> -C <sub>28</sub> (mg/kg)	GRO + DRO C <sub>6</sub> -C <sub>28</sub> (mg/kg)	ORO C <sub>28</sub> -C <sub>35</sub> (mg/kg)	TPH C <sub>6</sub> -C <sub>35</sub> (mg/kg)	Chloride [September 2019] (mg/kg)	Chloride [October 2019] (mg/kg)	Chloride [September 2020] (mg/kg)
NMOCD Closure Criteria		10	50	-	-	-	-	100	600		
TT-7/SB-7A/SB-7B	0-1	<0.00201	<0.00201	<49.9	<49.9	<49.9	<49.9	<49.9	493	1460	2890
TT-7/SB-7A/SB-7B	2-3	-	-	-	-	-	-	-	455	1050	1180
TT-7/SB-7A/SB-7B	3-4	-	-	-	-	-	-	-	1,210	1,210	-
TT-7/SB-7A/SB-7B	4-5	-	-	-	-	-	-	-	1,580	1,570	1,720
TT-7/SB-7A/SB-7B	5-6	-	-	-	-	-	-	-	1,780	1,530	-
TT-7/SB-7A/SB-7B	6-7	-	-	-	-	-	-	-	1,990	1,540	2,210
TT-7/SB-7A/SB-7B	7-8	-	-	-	-	-	-	-	2,020	1,350	-
TT-7/SB-7A/SB-7B	8-9	-	-	-	-	-	-	-	1,400	1,490	-
TT-7/SB-7A/SB-7B	9-10	-	-	-	-	-	-	-	1,400	1,230	1,860
TT-7/SB-7A/SB-7B	10-11	-	-	-	-	-	-	-	1,330	921	-
TT-7/SB-7A/SB-7B	11-12	-	-	-	-	-	-	-	1,220	1,010	-
TT-7/SB-7A/SB-7B	12-13	-	-	-	-	-	-	-	943	903	-
TT-7/SB-7A/SB-7B	13-14	-	-	-	-	-	-	-	-	924	-
TT-7/SB-7A/SB-7B	14-15	-	-	-	-	-	-	-	-	1,280	1,180
TT-7/SB-7A/SB-7B	15-16	-	-	-	-	-	-	-	-	1,230	-
TT-7/SB-7A/SB-7B	16-17	-	-	-	-	-	-	-	-	751	1,260
TT-7/SB-7A/SB-7B	17-18	-	-	-	-	-	-	-	-	1,120	-
TT-7/SB-7A/SB-7B	18-19	-	-	-	-	-	-	-	-	939	1,340
TT-7/SB-7A/SB-7B	20-21	-	-	-	-	-	-	-	-	-	722
TT-7/SB-7A/SB-7B	22-23	-	-	-	-	-	-	-	-	-	268

TABLE 1											
Summary of Delineation Sampling Analytical Results											
Concentrations of BTEX, TPH, and/or Chloride in Soil											
Sample Location	Depth (ft.)	SW 846 8021B		SW 846 8015M Ext.					E 300		
		Benzene (mg/kg)	BTEX (mg/kg)	GRO C <sub>6</sub> -C <sub>10</sub> (mg/kg)	DRO C <sub>10</sub> -C <sub>28</sub> (mg/kg)	GRO + DRO C <sub>6</sub> -C <sub>28</sub> (mg/kg)	ORO C <sub>28</sub> - C <sub>35</sub> (mg/kg)	TPH C <sub>6</sub> - C <sub>35</sub> (mg/kg)	Chloride [September 2019] (mg/kg)	Chloride [October 2019] (mg/kg)	Chloride [September 2020] (mg/kg)
NMOCD Closure Criteria		10	50	-	-	-	-	100	600		
TT-8	0-1	<0.00201	<0.00201	<50.0	<50.0	<50.0	<50.0	<50	39.3	-	-
TT-8	2-3	-	-	-	-	-	-	-	349	-	-
TT-8	3-4	-	-	-	-	-	-	-	373	-	-
TT-8	4-5	-	-	-	-	-	-	-	346	-	-
TT-8	5-6	-	-	-	-	-	-	-	382	-	-
TT-9	0-1	<0.00199	<0.00199	<49.9	<49.9	<49.9	<49.9	<49.9	25.5	-	-
TT-9	2-3	-	-	-	-	-	-	-	<4.96	-	-
TT-9	3-4	-	-	-	-	-	-	-	<5.04	-	-
TT-9	4-5	-	-	-	-	-	-	-	<5.05	-	-
TT-9	5-6	-	-	-	-	-	-	-	<4.97	-	-
TT-10	0-1	<0.00198	<0.00198	<49.9	<49.9	<49.9	<49.9	<49.9	5.06	-	-
TT-10	2-3	-	-	-	-	-	-	-	<5.05	-	-
TT-10	3-4	-	-	-	-	-	-	-	<5.04	-	-
TT-10	4-5	-	-	-	-	-	-	-	<5.00	-	-
TT-10	5-6	-	-	-	-	-	-	-	<4.99	-	-

TABLE 1											
Summary of Delineation Sampling Analytical Results											
Concentrations of BTEX, TPH, and/or Chloride in Soil											
Sample Location	Depth (ft.)	SW 846 8021B		SW 846 8015M Ext.					E 300		
		Benzene (mg/kg)	BTEX (mg/kg)	GRO C <sub>6</sub> -C <sub>10</sub> (mg/kg)	DRO C <sub>10</sub> -C <sub>28</sub> (mg/kg)	GRO + DRO C <sub>6</sub> -C <sub>28</sub> (mg/kg)	ORO C <sub>28</sub> - C <sub>35</sub> (mg/kg)	TPH C <sub>6</sub> - C <sub>35</sub> (mg/kg)	Chloride [September 2019] (mg/kg)	Chloride [October 2019] (mg/kg)	Chloride [September 2020] (mg/kg)
NMOCD Closure Criteria		10	50	-	-	-	-	100	600		
TT-11/SB-11A/SB-11B	0-1	<0.00201	<0.00201	<50.0	<50.0	<50.0	<50.0	<50	26.7	52.1	167
TT-11/SB-11A/SB-11B	2-3	-	-	-	-	-	-	-	57.4	281	509
TT-11/SB-11A/SB-11B	3-4	-	-	-	-	-	-	-	287	673	-
TT-11/SB-11A/SB-11B	4-5	-	-	-	-	-	-	-	677	789	1,660
TT-11/SB-11A/SB-11B	5-6	-	-	-	-	-	-	-	1,600	646	-
TT-11/SB-11A/SB-11B	6-7	-	-	-	-	-	-	-	904	889	1,230
TT-11/SB-11A/SB-11B	7-8	-	-	-	-	-	-	-	812	1,100	-
TT-11/SB-11A/SB-11B	8-9	-	-	-	-	-	-	-	756	1,150	-
TT-11/SB-11A/SB-11B	9-10	-	-	-	-	-	-	-	797	1,400	1,290
TT-11/SB-11A/SB-11B	10-11	-	-	-	-	-	-	-	1,460	1,630	-
TT-11/SB-11A/SB-11B	11-12	-	-	-	-	-	-	-	1,630	1,030	-
TT-11/SB-11A/SB-11B	12-13	-	-	-	-	-	-	-	1,140	384	1,540
TT-11/SB-11A/SB-11B	14-15	-	-	-	-	-	-	-	-	-	862
TT-11/SB-11A/SB-11B	16-17	-	-	-	-	-	-	-	-	-	531
TT-12/SB-12A/SB-12B	0-1	<0.00201	<0.00201	<50.0	<50.0	<50.0	<50.0	<50	26.0	23.5	14.4
TT-12/SB-12A/SB-12B	2-3	-	-	-	-	-	-	-	114	192	11.3
TT-12/SB-12A/SB-12B	3-4	-	-	-	-	-	-	-	718	626	-
TT-12/SB-12A/SB-12B	4-5	-	-	-	-	-	-	-	1,670	1,360	1,370
TT-12/SB-12A/SB-12B	5-6	-	-	-	-	-	-	-	2,230	1,400	-
TT-12/SB-12A/SB-12B	6-7	-	-	-	-	-	-	-	2,340	615	1,800
TT-12/SB-12A/SB-12B	7-8	-	-	-	-	-	-	-	1,510	605	-
TT-12/SB-12A/SB-12B	8-9	-	-	-	-	-	-	-	1,170	478	-
TT-12/SB-12A/SB-12B	9-10	-	-	-	-	-	-	-	1,260	363	313
TT-12/SB-12A/SB-12B	10-11	-	-	-	-	-	-	-	1,070	261	-
TT-12/SB-12A/SB-12B	11-12	-	-	-	-	-	-	-	1,170	-	-
TT-12/SB-12A/SB-12B	12-13	-	-	-	-	-	-	-	1,200	-	-
TT-12/SB-12A/SB-12B	13-14	-	-	-	-	-	-	-	1,430	-	-
TT-12/SB-12A/SB-12B	14-15	-	-	-	-	-	-	-	1,160	-	-

TABLE 1											
Summary of Delineation Sampling Analytical Results											
Concentrations of BTEX, TPH, and/or Chloride in Soil											
Sample Location	Depth (ft.)	SW 846 8021B		SW 846 8015M Ext.					E 300		
		Benzene (mg/kg)	BTEX (mg/kg)	GRO C <sub>6</sub> -C <sub>10</sub> (mg/kg)	DRO C <sub>10</sub> -C <sub>28</sub> (mg/kg)	GRO + DRO C <sub>6</sub> -C <sub>28</sub> (mg/kg)	ORO C <sub>28</sub> -C <sub>35</sub> (mg/kg)	TPH C <sub>6</sub> -C <sub>35</sub> (mg/kg)	Chloride [September 2019] (mg/kg)	Chloride [October 2019] (mg/kg)	Chloride [September 2020] (mg/kg)
NMOCD Closure Criteria		10	50	-	-	-	-	100	600		
TT-13/SB-13A	0-1	<0.00199	<0.00199	<49.9	<49.9	<49.9	<49.9	<49.9	30.8	-	6,980
TT-13/SB-13A	2-3	-	-	-	-	-	-	-	29.1	-	14,600
TT-13/SB-13A	3-4	-	-	-	-	-	-	-	116	-	-
TT-13/SB-13A	4-5	-	-	-	-	-	-	-	874	-	776
TT-13/SB-13A	5-6	-	-	-	-	-	-	-	1,390	-	1,390
TT-13/SB-13A	6-7	-	-	-	-	-	-	-	1,410	-	540
TT-13/SB-13A	7-8	-	-	-	-	-	-	-	864	-	-
TT-13/SB-13A	8-9	-	-	-	-	-	-	-	994	-	-
TT-13/SB-13A	9-10	-	-	-	-	-	-	-	943	-	602
TT-13/SB-13A	10-11	-	-	-	-	-	-	-	741	-	-
TT-13/SB-13A	11-12	-	-	-	-	-	-	-	777	-	-
TT-13/SB-13A	12-13	-	-	-	-	-	-	-	521	-	258
TT-14/SB-14A	0-1	<0.00200	<0.002	<49.8	<49.8	<49.8	<49.8	<49.8	5,730	-	3,220
TT-14/SB-14A	2-3	-	-	-	-	-	-	-	2,290	-	2,040
TT-14/SB-14A	3-4	-	-	-	-	-	-	-	131	-	-
TT-14/SB-14A	4-5	-	-	-	-	-	-	-	89.6	-	110
TT-14/SB-14A	5-6	-	-	-	-	-	-	-	108	-	-

TABLE 1											
Summary of Delineation Sampling Analytical Results											
Concentrations of BTEX, TPH, and/or Chloride in Soil											
Sample Location	Depth (ft.)	SW 846 8021B		SW 846 8015M Ext.					E 300		
		Benzene (mg/kg)	BTEX (mg/kg)	GRO C <sub>6</sub> -C <sub>10</sub> (mg/kg)	DRO C <sub>10</sub> -C <sub>28</sub> (mg/kg)	GRO + DRO C <sub>6</sub> -C <sub>28</sub> (mg/kg)	ORO C <sub>28</sub> -C <sub>35</sub> (mg/kg)	TPH C <sub>6</sub> -C <sub>35</sub> (mg/kg)	Chloride [September 2019] (mg/kg)	Chloride [October 2019] (mg/kg)	Chloride [September 2020] (mg/kg)
NMOCD Closure Criteria		10	50	-	-	-	-	100	600		
TT-15/SB-15A/SB-15B	0-1	<0.00198	<0.00198	<50.0	<50.0	<50.0	<50.0	<50	1,510	774	3,830
TT-15/SB-15A/SB-15B	2-3	-	-	-	-	-	-	-	1,800	1,070	2,120
TT-15/SB-15A/SB-15B	3-4	-	-	-	-	-	-	-	2,000	1,480	-
TT-15/SB-15A/SB-15B	4-5	-	-	-	-	-	-	-	2,110	1,540	1,910
TT-15/SB-15A/SB-15B	5-6	-	-	-	-	-	-	-	2,180	1,360	-
TT-15/SB-15A/SB-15B	6-7	-	-	-	-	-	-	-	2,230	1,340	2,390
TT-15/SB-15A/SB-15B	7-8	-	-	-	-	-	-	-	2,070	1,320	-
TT-15/SB-15A/SB-15B	8-9	-	-	-	-	-	-	-	2,110	1,060	-
TT-15/SB-15A/SB-15B	9-10	-	-	-	-	-	-	-	2,160	1,970	1,040
TT-15/SB-15A/SB-15B	10-11	-	-	-	-	-	-	-	1,990	1,900	-
TT-15/SB-15A/SB-15B	11-12	-	-	-	-	-	-	-	1,720	1,620	-
TT-15/SB-15A/SB-15B	12-13	-	-	-	-	-	-	-	1,270	839	-
TT-15/SB-15A/SB-15B	13-14	-	-	-	-	-	-	-	-	1,510	-
TT-15/SB-15A/SB-15B	14-15	-	-	-	-	-	-	-	-	1,250	974
TT-15/SB-15A/SB-15B	15-16	-	-	-	-	-	-	-	-	886	-
TT-15/SB-15A/SB-15B	16-17	-	-	-	-	-	-	-	-	-	744
TT-15/SB-15A/SB-15B	18-19	-	-	-	-	-	-	-	-	-	173

TABLE 1											
Summary of Delineation Sampling Analytical Results											
Concentrations of BTEX, TPH, and/or Chloride in Soil											
Sample Location	Depth (ft.)	SW 846 8021B		SW 846 8015M Ext.					E 300		
		Benzene (mg/kg)	BTEX (mg/kg)	GRO C <sub>6</sub> -C <sub>10</sub> (mg/kg)	DRO C <sub>10</sub> -C <sub>28</sub> (mg/kg)	GRO + DRO C <sub>6</sub> -C <sub>28</sub> (mg/kg)	ORO C <sub>28</sub> -C <sub>35</sub> (mg/kg)	TPH C <sub>6</sub> -C <sub>35</sub> (mg/kg)	Chloride [September 2019] (mg/kg)	Chloride [October 2019] (mg/kg)	Chloride [September 2020] (mg/kg)
NMOCD Closure Criteria		10	50	-	-	-	-	100	600		
TT-16/SB-16A/SB-16B	0-1	<0.00201	<0.00201	<50.0	<50.0	<50.0	<50.0	<50	12.7	1,140	273
TT-16/SB-16A/SB-16B	2-3	-	-	-	-	-	-	-	15.5	409	383
TT-16/SB-16A/SB-16B	3-4	-	-	-	-	-	-	-	205	2,610	-
TT-16/SB-16A/SB-16B	4-5	-	-	-	-	-	-	-	678	1,010	82.5
TT-16/SB-16A/SB-16B	5-6	-	-	-	-	-	-	-	709	1,350	-
TT-16/SB-16A/SB-16B	6-7	-	-	-	-	-	-	-	-	1,220	22.7
TT-16/SB-16A/SB-16B	7-8	-	-	-	-	-	-	-	-	1,740	-
TT-16/SB-16A/SB-16B	8-9	-	-	-	-	-	-	-	-	1,180	-
TT-16/SB-16A/SB-16B	9-10	-	-	-	-	-	-	-	-	1,100	670
TT-16/SB-16A/SB-16B	10-11	-	-	-	-	-	-	-	-	1,450	-
TT-16/SB-16A/SB-16B	14-15	-	-	-	-	-	-	-	-	-	2,600
TT-16/SB-16A/SB-16B	16-17	-	-	-	-	-	-	-	-	-	3,070
TT-16/SB-16A/SB-16B	18-19	-	-	-	-	-	-	-	-	-	1,700
TT-16/SB-16A/SB-16B	20-21	-	-	-	-	-	-	-	-	-	1,380
TT-16/SB-16A/SB-16B	21-22	-	-	-	-	-	-	-	-	-	1,700
TT-16/SB-16A/SB-16B	23-24	-	-	-	-	-	-	-	-	-	1,980
TT-16/SB-16A/SB-16B	25-26	-	-	-	-	-	-	-	-	-	620
TT-16/SB-16A/SB-16B	27-28	-	-	-	-	-	-	-	-	-	579
TT-N1	0-1	<0.00200	<0.002	<49.8	<49.8	<49.8	<49.8	<49.8	279	-	-
TT-N1	2-3	-	-	-	-	-	-	-	6.69	-	-
TT-N1	3-4	-	-	-	-	-	-	-	8.30	-	-
TT-N1	4-5	-	-	-	-	-	-	-	9.45	-	-
TT-N1	5-6	-	-	-	-	-	-	-	4.96	-	-

TABLE 1											
Summary of Delineation Sampling Analytical Results											
Concentrations of BTEX, TPH, and/or Chloride in Soil											
Sample Location	Depth (ft.)	SW 846 8021B		SW 846 8015M Ext.					E 300		
		Benzene (mg/kg)	BTEX (mg/kg)	GRO C <sub>6</sub> -C <sub>10</sub> (mg/kg)	DRO C <sub>10</sub> -C <sub>28</sub> (mg/kg)	GRO + DRO C <sub>6</sub> -C <sub>28</sub> (mg/kg)	ORO C <sub>28</sub> - C <sub>35</sub> (mg/kg)	TPH C <sub>6</sub> - C <sub>35</sub> (mg/kg)	Chloride [September 2019] (mg/kg)	Chloride [October 2019] (mg/kg)	Chloride [September 2020] (mg/kg)
NMOCD Closure Criteria		10	50	-	-	-	-	100	600		
TT-S1	0-1	<0.00202	<0.00202	<50.0	<50.0	<50.0	<50.0	<50	11.6	-	-
TT-S1	2-3	-	-	-	-	-	-	-	55.2	-	-
TT-S1	3-4	-	-	-	-	-	-	-	294	-	-
TT-S1	4-5	-	-	-	-	-	-	-	347	-	-
TT-S1	5-6	-	-	-	-	-	-	-	205	-	-
E1	0-1	<0.00199	<0.00199	<50.0	<50.0	<50.0	<50.0	<50	5.49	-	-
E1	2-3	-	-	-	-	-	-	-	5.77	-	-
E1	3-4	-	-	-	-	-	-	-	<5.02	-	-
E1	4-5	-	-	-	-	-	-	-	<4.96	-	-
E2	0-1	<0.00199	<0.00199	<49.9	<49.9	<49.9	<49.9	<49.9	<5.04	-	-
E2	2-3	-	-	-	-	-	-	-	5.17	-	-
E2	3-4	-	-	-	-	-	-	-	217	-	-
E2	4-5	-	-	-	-	-	-	-	375	-	-
E3	0-1	<0.00199	<0.00199	<49.9	<49.9	<49.9	<49.9	<49.9	5.58	-	-
E3	2-3	-	-	-	-	-	-	-	<4.97	-	-
E3	3-4	-	-	-	-	-	-	-	6.53	-	-
E3	4-5	-	-	-	-	-	-	-	10.7	-	-
E4	0-1	<0.00199	<0.00199	<49.8	<49.8	<49.8	<49.8	<49.8	<5.02	-	-
E4	2-3	-	-	-	-	-	-	-	12.8	-	-
E4	3-4	-	-	-	-	-	-	-	112	-	-
E4	4-5	-	-	-	-	-	-	-	249	-	-


TABLE 1											
Summary of Delineation Sampling Analytical Results											
Concentrations of BTEX, TPH, and/or Chloride in Soil											
Sample Location	Depth (ft.)	SW 846 8021B		SW 846 8015M Ext.					E 300		
		Benzene (mg/kg)	BTEX (mg/kg)	GRO C <sub>6</sub> -C <sub>10</sub> (mg/kg)	DRO C <sub>10</sub> -C <sub>28</sub> (mg/kg)	GRO + DRO C <sub>6</sub> -C <sub>28</sub> (mg/kg)	ORO C <sub>28</sub> -C <sub>35</sub> (mg/kg)	TPH C <sub>6</sub> -C <sub>35</sub> (mg/kg)	Chloride [September 2019] (mg/kg)	Chloride [October 2019] (mg/kg)	Chloride [September 2020] (mg/kg)
NMOCD Closure Criteria		10	50	-	-	-	-	100	600		
E5	0-1	<0.00200	<0.002	<49.9	<49.9	<49.9	<49.9	<49.9	25.0	-	-
E5	2-3	-	-	-	-	-	-	-	220	-	-
E5	3-4	-	-	-	-	-	-	-	449	-	-
E5	4-5	-	-	-	-	-	-	-	697	-	-
TT-W1	0-1	<0.00202	<0.00202	<50.0	<50.0	<50.0	<50.0	<50	<5.04	-	-
TT-W1	2-3	-	-	-	-	-	-	-	<4.96	-	-
TT-W1	3-4	-	-	-	-	-	-	-	<5.02	-	-
TT-W1	4-5	-	-	-	-	-	-	-	<5.05	-	-
TT-W1	5-6	-	-	-	-	-	-	-	5.95	-	-
W2	0-1	<0.00198	<0.00198	<49.9	<49.9	<49.9	<49.9	<49.9	6.00	-	-
W2	2-3	-	-	-	-	-	-	-	20.1	-	-
W2	3-4	-	-	-	-	-	-	-	38.3	-	-
W2	4-5	-	-	-	-	-	-	-	45.3	-	-
W2	5-6	-	-	-	-	-	-	-	403	-	-
W3	0-1	<0.00202	<0.00202	<50.0	<50.0	<50.0	<50.0	<50	9.98	-	-
W3	2-3	-	-	-	-	-	-	-	12.5	-	-
W3	3-4	-	-	-	-	-	-	-	8.84	-	-
W3	4-5	-	-	-	-	-	-	-	15.5	-	-
W3	5-6	-	-	-	-	-	-	-	52.4	-	-

TABLE 1											
Summary of Delineation Sampling Analytical Results											
Concentrations of BTEX, TPH, and/or Chloride in Soil											
Sample Location	Depth (ft.)	SW 846 8021B		SW 846 8015M Ext.					E 300		
		Benzene (mg/kg)	BTEX (mg/kg)	GRO C <sub>6</sub> -C <sub>10</sub> (mg/kg)	DRO C <sub>10</sub> -C <sub>28</sub> (mg/kg)	GRO + DRO C <sub>6</sub> -C <sub>28</sub> (mg/kg)	ORO C <sub>28</sub> - C <sub>35</sub> (mg/kg)	TPH C <sub>6</sub> - C <sub>35</sub> (mg/kg)	Chloride [September 2019] (mg/kg)	Chloride [October 2019] (mg/kg)	Chloride [September 2020] (mg/kg)
NMOCD Closure Criteria		10	50	-	-	-	-	100	600		
W4	0-1	<0.00198	<0.00198	<50.0	<50.0	<50.0	<50.0	<50	25.7	-	-
W4	2-3	-	-	-	-	-	-	-	<5.00	-	-
W4	3-4	-	-	-	-	-	-	-	5.08	-	-
W4	4-5	-	-	-	-	-	-	-	5.62	-	-
W4	5-6	-	-	-	-	-	-	-	6.10	-	-
W5/SB-W5A/SB-W5B	0-1	<0.00200	<0.002	<49.9	<49.9	<49.9	<49.9	<49.9	1,520	458	322
W5/SB-W5A/SB-W5B	2-3	-	-	-	-	-	-	-	1,780	1,870	1,020
W5/SB-W5A/SB-W5B	3-4	-	-	-	-	-	-	-	2,170	1,910	-
W5/SB-W5A/SB-W5B	4-5	-	-	-	-	-	-	-	2,460	2,350	2,260
W5/SB-W5A/SB-W5B	5-6	-	-	-	-	-	-	-	2,880	2,510	-
W5/SB-W5A/SB-W5B	6-7	-	-	-	-	-	-	-	2,780	2,480	2,170
W5/SB-W5A/SB-W5B	7-8	-	-	-	-	-	-	-	3,320	2,000	-
W5/SB-W5A/SB-W5B	8-9	-	-	-	-	-	-	-	2,550	1,990	-
W5/SB-W5A/SB-W5B	9-10	-	-	-	-	-	-	-	2,330	2,140	2,390
W5/SB-W5A/SB-W5B	10-11	-	-	-	-	-	-	-	1,650	1,480	-
W5/SB-W5A/SB-W5B	11-12	-	-	-	-	-	-	-	1,530	1,620	-
W5/SB-W5A/SB-W5B	12-13	-	-	-	-	-	-	-	1,280	806	2,430
W5/SB-W5A/SB-W5B	13-14	-	-	-	-	-	-	-	-	795	-
W5/SB-W5A/SB-W5B	14-15	-	-	-	-	-	-	-	-	745	985
W5/SB-W5A/SB-W5B	15-16	-	-	-	-	-	-	-	-	840	-
W5/SB-W5A/SB-W5B	16-17	-	-	-	-	-	-	-	-	-	836
W5/SB-W5A/SB-W5B	18-19	-	-	-	-	-	-	-	-	-	483
W6	0-1	-	-	-	-	-	-	-	-	-	478
W6	1-2	-	-	-	-	-	-	-	-	-	73.8
W6	2-3	-	-	-	-	-	-	-	-	-	6.21
NMOCD Closure Criteria		10	50	-	-	-	-	100	-	-	600

TABLE 1											
Summary of Delineation Sampling Analytical Results											
Concentrations of BTEX, TPH, and/or Chloride in Soil											
Sample Location	Depth (ft.)	SW 846 8021B		SW 846 8015M Ext.					E 300		
		Benzene (mg/kg)	BTEX (mg/kg)	GRO C <sub>6</sub> -C <sub>10</sub> (mg/kg)	DRO C <sub>10</sub> -C <sub>28</sub> (mg/kg)	GRO + DRO C <sub>6</sub> -C <sub>28</sub> (mg/kg)	ORO C <sub>28</sub> - C <sub>35</sub> (mg/kg)	TPH C <sub>6</sub> - C <sub>35</sub> (mg/kg)	Chloride [September 2019] (mg/kg)	Chloride [October 2019] (mg/kg)	Chloride [September 2020] (mg/kg)
NMOCD Closure Criteria		10	50	-	-	-	-	100	600		

 Clean Overburden

 Proposed Excavation

 Sample Result Indicates Possible 'Sluff'

**APPENDIX A**  
**COPIES OF E-MAIL CORRESPONDENCE**

**From:** [Bratcher, Mike, EMNRD](#)  
**To:** [Stoffel, Jared](#); [Hamlet, Robert, EMNRD](#)  
**Cc:** [Tavarez, Ike](#); [Billings, Bradford, EMNRD](#); [Nobui, Jennifer, EMNRD](#); [Harimon, Jocelyn, EMNRD](#); [Borgh, Bill](#)  
**Subject:** RE: [EXTERNAL] SRO 5 State 506H & 507H (2RP-5717) Workplan Status Update  
**Date:** Friday, June 10, 2022 2:44:09 PM  
**Attachments:** [image003.png](#)

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Jared,

Please obtain one, five-point composite sample from each area (Area 7 & Area 8) prior to liner placement. Samples may be tested for chloride only, and are for documentation only. That is a change on OCD's part from what was discussed at our meeting. Other than that, I believe we are in agreement on the path forward. If we need to discuss this addition, please let me know.

Thank you,

**Mike Bratcher** • Incident Supervisor  
Environmental Bureau  
EMNRD - Oil Conservation Division  
Artesia, NM 88210  
(575) 626-0857 | [mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Stoffel, Jared <JStoffel@trccompanies.com>  
**Sent:** Friday, June 10, 2022 8:48 AM  
**To:** Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>  
**Cc:** Tavarez, Ike <Ike.Tavarez@conocophillips.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Nobui, Jennifer, EMNRD <Jennifer.Nobui@state.nm.us>; Harimon, Jocelyn, EMNRD <Jocelyn.Harimon@state.nm.us>; Borgh, Bill <Bill.Borgh@conocophillips.com>  
**Subject:** RE: [EXTERNAL] SRO 5 State 506H & 507H (2RP-5717) Workplan Status Update

All,

Thank you very much for taking the time to meet with us on June 8<sup>th</sup> regarding the SRO 5 State

506H & 507H. Based on our conversation, our understanding is that:

- Excavation and removal of soils on the north end (Areas 1 through 6) of the Site will occur to the 600 mg/kg chloride limit.
- Excavation and removal of soils on the south end (Areas 7 & 8) of the Site will occur to approximately 4 feet bgs and install a 20-mil liner in the excavation bottom.
- Confirmation sidewall samples will be collected on a 500 square foot basis. The chloride limit for all sidewalls will be 600 mg/kg.
- Confirmation floor samples will be collected on a 500 square foot basis in Areas 1 through 6. No floor samples will be collected from the area to be lined (Areas 7 & 8). The limit for chloride concentrations in Areas 1 through 6 will be 600 mg/kg.
- Clean overburden excavated from the surface will be mixed to homogenize the stockpile atop plastic and sampled via 5-point composite for chloride concentrations on a 50 cubic yard basis. If chloride concentrations are below 600 mg/kg, the soil will be re-used for backfilling. If composite sample exceed 600 mg/kg chloride, the material will be hauled to proper disposal.
- Three (3) additional monitor wells will be installed. The proposed easternmost well will be laterally moved northward to be in-line with MW-2, but not so far north that the well is installed into the presumed alluvium or Rustler/alluvium transition.
- Additional groundwater monitoring/sampling will be performed following the monitor wells installation to further investigate the groundwater underlying the Site.

If our understanding is consistent with your intent, please respond accordingly to this email. COP will provide a workplan addendum following your confirmation for submittal into the NMOCD e-permitting portal. This addendum will only include the remediation workplan strategy and will not re-document previous characterization of the Site. I will additionally reach out when we submit through the portal. Thank you very much for your time and consideration.

**Jared Stoffel, P.G.**  
Project Manager



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---

**From:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>

**Sent:** Thursday, June 2, 2022 4:06 PM

**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Cc:** Tavarez, Ike <[Ike.Tavarez@conocophillips.com](mailto:Ike.Tavarez@conocophillips.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>; Harimon, Jocelyn, EMNRD <[Jocelyn.Harimon@state.nm.us](mailto:Jocelyn.Harimon@state.nm.us)>

**Subject:** RE: [EXTERNAL] SRO 5 State 506H & 507H (2RP-5717) Workplan Status Update

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Jared,

I don't remember anybody from the OCD saying they approved the background concentration data. Cristina Eads initially denied it and said, "the background data was not accepted". When we had the meeting, we discussed that a couple of the background soil investigations (Background 3 and 4) didn't find any substantial contaminants at a couple locations. The lack of contaminants at these locations shows the original soil makeup doesn't justify using the higher chloride numbers for background purposes. The higher TDS, Chloride, and Sulfate numbers at monitoring wells MW-1 and MW2 do not correlate with the corresponding boring log data, showing that the evaporitic depositional conditions were solely responsible for the elevated TDS and Cations/Anions. Some of the sample locations (Example: TT-13/SB-13A and TT-15/SB-15A/SB-15B) showed huge jumps in Chloride numbers from September 2019 to September 2020 in the top 6'-7', which is inconsistent with normal soil leaching behavior.

Regards,

**Robert Hamlet** • Environmental Specialist - Advanced

Environmental Bureau

EMNRD - Oil Conservation Division

811 S. First Street | Artesia, NM 88210

575.909.0302 | [robert.hamlet@state.nm.us](mailto:robert.hamlet@state.nm.us)

<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Sent:** Thursday, June 2, 2022 12:37 PM

**To:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>

**Cc:** Tavarez, Ike <[Ike.Tavarez@conocophillips.com](mailto:Ike.Tavarez@conocophillips.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>; Harimon, Jocelyn, EMNRD <[Jocelyn.Harimon@state.nm.us](mailto:Jocelyn.Harimon@state.nm.us)>

**Subject:** RE: [EXTERNAL] SRO 5 State 506H & 507H (2RP-5717) Workplan Status Update

Robert,

The last meeting regarding this release was on November 17<sup>th</sup>, 2021. In that meeting (attended by myself, Ike, yourself, Mike, and Bradford) the consensus was the background data that was presented was acceptable to the OCD. However, the denial letter indicates the background data was not acceptable to the OCD. We would like to discuss this further with you and your team – our understanding following the meeting in November was that the OCD found our remediation plan acceptable, and we were simply waiting for formal review through the portal. We had prepared to enact the workplan as our meeting had indicated the workplan was acceptable. We would like to clarify with you why the OCD found the background data acceptable in November but have denied the workplan based on the background data. We would really appreciate your time for this meeting, as we would like to move the project forward. Please let me know if we can still meet on June 8<sup>th</sup>. Thank you for your time and consideration.

**Jared Stoffel, P.G.**  
Project Manager



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---

**From:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>

**Sent:** Thursday, June 2, 2022 8:40 AM

**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Cc:** Tavarez, Ike <[Ike.Tavarez@conocophillips.com](mailto:Ike.Tavarez@conocophillips.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>; Harimon, Jocelyn, EMNRD <[Jocelyn.Harimon@state.nm.us](mailto:Jocelyn.Harimon@state.nm.us)>

**Subject:** RE: [EXTERNAL] SRO 5 State 506H & 507H (2RP-5717) Workplan Status Update

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Jared,

We had a meeting a 3 or 4 weeks ago about this release. The OCD Environmental group is extremely busy and short staffed down here in the Southwest. Pulling resources off what they're doing for a another meeting should be a last resort if possible. Please, email me any questions/concerns you might have and I will try to answer them before we schedule another meeting. Thanks

**Robert Hamlet** • Environmental Specialist - Advanced  
Environmental Bureau  
EMNRD - Oil Conservation Division  
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575.909.0302 | [robert.hamlet@state.nm.us](mailto:robert.hamlet@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Sent:** Wednesday, June 1, 2022 1:35 PM  
**To:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>  
**Cc:** Tavaréz, Ike <[Ike.Tavaréz@conocophillips.com](mailto:Ike.Tavaréz@conocophillips.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>; Harimon, Jocelyn, EMNRD <[Jocelyn.Harimon@state.nm.us](mailto:Jocelyn.Harimon@state.nm.us)>  
**Subject:** RE: [EXTERNAL] SRO 5 State 506H & 507H (2RP-5717) Workplan Status Update

Robert,

I apologize for the delayed response. I have requested a meeting and sent an invite via Teams for all of the members on this email. The meeting request is for Wednesday June 8<sup>th</sup> at 11:00 CST (10:00 MST). Please let me know if the date/time needs to be adjusted and I will change accordingly. I really appreciate you all making time for this discussion – please let me know if anyone has not received a Teams invite. Thank you.

**Jared Stoffel, P.G.**  
Project Manager



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---

**From:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>  
**Sent:** Tuesday, May 24, 2022 10:30 AM  
**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Cc:** Tavaréz, Ike <[Ike.Tavaréz@conocophillips.com](mailto:Ike.Tavaréz@conocophillips.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>; Harimon, Jocelyn, EMNRD <[Jocelyn.Harimon@state.nm.us](mailto:Jocelyn.Harimon@state.nm.us)>  
**Subject:** RE: [EXTERNAL] SRO 5 State 506H & 507H (2RP-5717) Workplan Status Update

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Jared,

We have numerous meetings planned in the next few weeks. Possibly the second week in June on a Tuesday or Wednesday would work. The OCD is short staffed at the moment and time is becoming a valuable commodity.

Please invite: Mike Bratcher [mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)  
Brad Billings [Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)  
Jennifer Nobui [Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)  
Jocelyn Harimon [Jocelyn.Harimon@state.nm.us](mailto:Jocelyn.Harimon@state.nm.us)

Thanks

**Robert Hamlet** • Environmental Specialist - Advanced  
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<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Sent:** Monday, May 23, 2022 10:00 AM  
**To:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Cc:** Tavarez, Ike <[Ike.Tavarez@conocophillips.com](mailto:Ike.Tavarez@conocophillips.com)>  
**Subject:** RE: [EXTERNAL] SRO 5 State 506H & 507H (2RP-5717) Workplan Status Update

Robert,

We would like to request a meeting to discuss the denial of the remediation work plan for the SRO 5 State 506H & 507H. We had a meeting with yourself, Bradford Billings, and Mike Bratcher on November 17, 2022 which the background chloride concentration data outside the draw was verbally approved. The only requested revision to the workplan prior to submission through the

portal was the additional monitoring wells, which your team approved the locations as I moved them on the map onscreen. In the denial letter, statement that the OCD does not accept speculative background analysis is not consistent with our previous discussions, and we'd like to discuss that point in particular. We also would like confirmation of sampling of overburden at a rate of every 200 cubic feet (7.5 cubic yard) rather than every 200 cubic yards, as 200 cubic feet will result in a lot of additional analyses. Please let me know if there is a time and date that would be agreeable to a meeting – either in person or via Teams – and I am happy to set the meeting up. Thank you very much for your consideration.

**Jared Stoffel, P.G.**  
Project Manager



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---

**From:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>  
**Sent:** Thursday, May 12, 2022 12:30 PM  
**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Cc:** Tavaréz, Ike <[Ike.Tavaréz@conocophillips.com](mailto:Ike.Tavaréz@conocophillips.com)>  
**Subject:** RE: [EXTERNAL] SRO 5 State 506H & 507H (2RP-5717) Workplan Status Update

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Jared,

The OCD would like to request a Site Map with the point of release clearly labelled. It will be uploaded to the incident file for future reference. Also, please include on any future reports.

Regards,

**Robert Hamlet** • Environmental Specialist - Advanced  
Environmental Bureau  
EMNRD - Oil Conservation Division  
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<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Sent:** Friday, May 6, 2022 1:21 PM  
**To:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Cc:** Tavaréz, Ike <[Ike.Tavaréz@conocophillips.com](mailto:Ike.Tavaréz@conocophillips.com)>  
**Subject:** RE: [EXTERNAL] SRO 5 State 506H & 507H (2RP-5717) Workplan Status Update

Excellent – thank you very much for the timeline! Have a great weekend!

**Jared Stoffel, P.G.**  
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752  
F: 512 329 8750 | C: 432 238 3003  
[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](http://TRCcompanies.com)

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**From:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>  
**Sent:** Friday, May 6, 2022 2:19 PM  
**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Cc:** Tavaréz, Ike <[Ike.Tavaréz@conocophillips.com](mailto:Ike.Tavaréz@conocophillips.com)>  
**Subject:** RE: [EXTERNAL] SRO 5 State 506H & 507H (2RP-5717) Workplan Status Update

This is an **EXTERNAL** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Jared,

There's 3 or 4 reports ahead of it, so I'd guess early to middle of next week.

**Robert Hamlet** • Environmental Specialist - Advanced  
Environmental Bureau  
EMNRD - Oil Conservation Division  
811 S. First Street | Artesia, NM 88210

575.909.0302 | [robert.hamlet@state.nm.us](mailto:robert.hamlet@state.nm.us)

<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Sent:** Friday, May 6, 2022 12:10 PM

**To:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>

**Cc:** Tavaréz, Ike <[Ike.Tavaréz@conocophillips.com](mailto:Ike.Tavaréz@conocophillips.com)>

**Subject:** [EXTERNAL] SRO 5 State 506H & 507H (2RP-5717) Workplan Status Update

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Robert, Mike, and Bradford,

I would like to reach out and follow up on the SRO 5 State 506H & 507H (2RP-5717) workplan. We met with you in mid-November 2021 (via Teams conference) to discuss a path forward and utilized that discussion to revise our workplan based on your comments. We recently re-submitted the workplan through the portal, and I was curious if we had a timeline for review and approval of the workplan so that I can begin logistical planning for remedial efforts. Please let me know if there are any questions, concerns, or if you would like to discuss the remediation workplan further. Thank you very much!

**Jared Stoffel, P.G.**  
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752

F: 512 329 8750 | C: 432 238 3003

[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](http://TRCcompanies.com)

Attached is what was submitted.

Thank you,

*Brittany N. Esparza*

**Brittany N. Esparza** | Environmental Technician, Permian | **ConocoPhillips**

O: 432-221-0398 | C: 432-349-1911 | 1CC-331 Midland, Texas

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**From:** [OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us) <[OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us)>

**Sent:** Thursday, May 12, 2022 2:35 PM

**To:** Esparza, Brittany <[Brittany.Esparza@conocophillips.com](mailto:Brittany.Esparza@conocophillips.com)>

**Subject:** [EXTERNAL]The Oil Conservation Division (OCD) has rejected the application, Application ID: 69453

**CAUTION:**This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern (c/o Brittany Esparza for COG OPERATING LLC),

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nRM1933644528, for the following reasons:

- **The Revised Remediation Plan is denied. The OCD does not accept speculative background analysis. Samples must be analyzed for the constituents listed in Table I of 19.15.29.12 NMAC. Sidewall/floor samples need to comply with the strictest closure criteria limits 600 mg/kg for Chlorides and 100 mg/kg TPH. A variance for 500 ft<sup>2</sup> confirmation floor/sidewall samples is approved. If top 4' overburden is used to backfill, samples must be taken every 200 cubic feet, meet the strictest closure criteria standards, and be included in final table. 3 additional monitoring wells are approved. Furthest east monitoring well needs to be about 150 feet north of where proposed. The work will need to occur in 90 days after the work plan has been approved.**

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 69453.

Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141.

Thank you,

Robert Hamlet

575-748-1283

[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)

**New Mexico Energy, Minerals and Natural Resources Department**

1220 South St. Francis Drive

Santa Fe, NM 87505

**APPENDIX B**  
**NMOCD FORM C-141**

Incident ID	
District RP	
Facility ID	
Application ID	

## 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>&lt;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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input checked="" type="checkbox"/> Yes <input 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 ½-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

Incident ID	
District RP	
Facility ID	
Application ID	

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: Ike Tavaréz Title: Senior HSE Supervisor

Signature:  Date: 7/11/2022

email: ike.tavaréz@conocophillips.com Telephone: (432) 685-2573

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Incident ID	
District RP	
Facility ID	
Application ID	

## 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.

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: Ike Tavaraz Title: Staff Program Manager  
Signature:  Date: 7/11/2022  
email: ike.tavaraz@conocophillips.com Telephone: (432) 685-2573

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Incident ID	NRM1933644528
District RP	
Facility ID	
Application ID	

## 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.*

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- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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: Ike Tavaraz Title: Staff Program Manager  
Signature:  Date: 7/11/2022  
email: ike.tavaraz@conocophillips.com Telephone: (432) 685-2573

**OCD Only**

Received by: Robert Hamlet Date: 11/15/2022

☐ Approved ☒ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: Robert Hamlet Date: 11/15/2022

**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 126606

**CONDITIONS**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 126606
	Action Type: [C-141] Release Corrective Action (C-141)

**CONDITIONS**

Created By	Condition	Condition Date
rhamlet	The Remediation Plan is Conditionally Approved. Confirmation samples in (Areas 1 through 6) need to meet 600 mg/kg for chlorides. Confirmation floor and wall samples will be conducted no more than 500 ft2. Samples must be analyzed for all constituents listed in Table I of 19.15.29.12 NMAC. (Areas 7 and 8) will be excavated to 4 feet below ground surface. A 5-point composite sample will be taken in (Area 7 and 8) before the liner is installed. Clean overburden will be sampled on a 50 cubic yard basis before used as backfill in the excavation. Groundwater monitoring/sampling will be conducted on all monitoring wells that are installed at the site. An annual groundwater monitoring report should be prepared and submitted to the OCD at the conclusion of each year.	11/15/2022