

# **RECLAMATION PLAN**

## **FRANKLIN MOUNTAIN ENERGY 3, LLC**

**EAST PEARL QUEEN UNIT #82**

**LEA COUNTY, NEW MEXICO**

**PREPARED FOR:**

New Mexico State Land Office  
310 Old Santa Fe Trail  
Santa Fe, NM 87501

**PREPARED BY:**



1718 SOUTH CHEYENNE AVENUE  
TULSA, OKLAHOMA 74119  
PHONE (918) 382-7581 & FAX (918) 382-7582

**FEBRUARY 12, 2024**

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## Acronyms

ALL	ALL Consulting, LLC	NMSLO	New Mexico State Land Office
AST	Aboveground Storage Tanks	NWI	National Wetland Inventory
bgs	Below Ground Surface	P&A	Plug and Abandon
BS	Blow Sand	PID	Photoionization Dectector
BTEX	Benzene, Toluene, Ethylbenzene, and Xylenes	SAR	Sodium Adsorption Ratio
mg/kg	Milligrams per Kilogram	SL	Sandy Loam
MDL	Method Detection Limit	TA	Temporary Abandonment
NMAC	New Mexico Administrative Code	TPH	Total Petroleum Hydrocarbons
NMOSE	New Mexico Office of the State Engineer	USDA	U.S. Department of Agriculture
NMDA	New Mexico Department of Agriculture	USGS	U.S. Geological Survey
NMOCD	New Mexico Oil Conservation Division		

# 1. Introduction

## 1.1 Site Location

The reclamation site is located in central Lea County, New Mexico, approximately 19 miles southwest of the city of Hobbs. The East Pearl Queen Unit #82 facility is located three (3) miles south of the intersection of Highway 62 and County Road 37. Latitude and longitude coordinates for the facility are presented in **Table 1**. A site location map is presented in **Appendix A - Figure 1**.

The facility includes a former well pad and a portion of an access road, with a disturbed area of 71,260 square feet (1.6 acres). The land surrounding the site includes rangeland as well as active and abandoned oil and gas sites. A site layout map is presented in **Appendix A - Figure 2**.

## 1.2 Site History

The site history for the facility was based on a review of New Mexico Oil Conservation Division (NMOCD) records and is summarized below.

The well last produced in August of 2010 and was plugged in September of 2013. One (1) oil release was reported in February of 2008, but no associated filing or details were available. NMOCD approved the notice of intent to plug and abandon (P&A) in July of 2013 and the subsequent report of P&A in September of 2013. The facility did not have any reported pits.

Table 1 – Facility Information

Name	API	Latitude	Longitude	Area to be Reclaimed (ft²)
East Pearl Queen Unit #82	30-025-31121	32.6282654	-103.4491882	71,260

### 1.3 Site Characteristics

The facility is located within the Laguna Valley physiographic province of New Mexico, south of the Mescalero Ridge. Based on a review of the National Wetland Inventory (NWI) data, the East Pearl Queen Unit #82 is not located within or adjacent to any wetlands or continuously flowing watercourses. A review of the topographic relief of the site indicated the surface is dominated by sand dunes, with a gentle regional slope to the east. A topographic map depicting the local drainage direction is presented in **Appendix A – Figure 3**.

The U.S. Department of Agriculture (USDA) Web Soil Survey indicates Simona fine sandy loams (0-3 percent slopes) are the predominant soil type at the East Pearl Queen Unit #82. A typical profile of this soil consists of fine sandy loam, underlain by clay loam and its runoff class is low.

The USGS Geologic Map of New Mexico shows the geologic formation underlying the facility consists of Quaternary eolian and piedmont deposits. These deposits consist of wind-derived sands and slope-deposited sediment along the eastern flank of the Pecos River Valley. They are typically capped by a thin layer of eolian sands. Within the Laguna Valley, the Ogallala formation was largely eroded away by the widening of the Pecos River Valley during Quaternary time. The underlying Triassic rocks were also eroded in some areas of the Pecos River Valley, resulting in a highly variable erosion surface beneath the Quaternary eolian and piedmont deposits. Due to the irregular upper surface of the underlying Triassic rocks, thickness of the Quaternary Deposits is variable within the Laguna Valley.

### 1.4 Groundwater Depth Determination

Within the site area, Quaternary sediments are the uppermost water-bearing unit, with a saturated thickness ranging from 15 to 30 feet. Depth to groundwater for the facility was determined based on the closest three (3) water well records as documented in the New Mexico Office of the State Engineer (NMOSE) online GIS tool.

Depths to groundwater for the three (3) nearest records to the East Pearl Queen Unit #82 were 24 feet below ground surface (bgs) at USGS 323808103265701 (0.55 miles north); 25 feet bgs at USGS 323721103262601 (0.58 miles southeast); and 35 feet bgs at POD 15155 (0.9 miles north). Average depth from the three (3) records was 28 feet bgs.

## 2. Site Characterization Study

On November 15, 2023, ALL Consulting, LLC visited the facility and conducted a site characterization, which included pedestrian and drone surveys of the vicinity to document the current conditions of soil, vegetation, and remaining production equipment.

### 2.1 General Observations

The facility had a short access road that led directly from an adjacent well pad. There was little infrastructure remaining and low vegetation density within the pad area. The formerly disturbed area to the north of the pad had been naturally revegetated. The site area was inspected for evidence of past releases associated with exploration and production activity, and no surface staining or discoloration was observed. Some debris remained on location and included a power pole, electrical terminal box, and heavy timber near the well marker, as well as a power pole and distribution transformer cluster at the southwest edge of the site.

A site photo log is included in **Appendix B**, and a drone photograph is included in **Appendix C**.

### 2.2 Site Sampling

A total of seven (7) surface soil samples were collected during the site characterization from depths of 0.5 to 1-foot bgs to identify potential contamination and facilitate soil preparation during reclamation.

All samples were analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX); total petroleum hydrocarbons (TPH); and chlorides. Additional soil quality analyses were also performed to quantify Sodium Adsorption Ratio (SAR) and Percent Calcium Carbonate. Sample locations are presented in **Appendix A - Figure 4**. All samples were submitted to Cardinal Laboratories in Hobbs, New Mexico, for analysis. Results are presented in **Section 2.3** below.

### 2.3 Sampling Results

Soil sampling results are presented in the following table and discussed below. Screening level exceedance locations are presented in **Appendix A - Figure 4**.

Soil sampling results for BTEX, chloride, and TPH were compared to the New Mexico Administrative Code (NMAC) closure criteria for sites with groundwater depths less than 50 feet. Sampling results for SAR and Percent Calcium Carbonate were used to characterize soil quality at the sites to aid in revegetation. The results for SAR and Percent Calcium Carbonate were compared to the soil suitability criteria defined in the New Mexico State Land Office (NMSLO) Revegetation Guidelines Handbook for Southeastern New Mexico.

BTEX was not detected above the respective method detection limits (MDL) in any of the seven (7) soil samples. The MDLs were established at 0.050 milligrams per kilogram (mg/kg) for Benzene, Toluene, and Ethylbenzene and at 0.15 mg/kg for Total Xylenes. These MDLs were well below the NMAC closure criteria of 10 mg/kg for Benzene and 50 mg/kg for BTEX.

Chloride was detected above the MDL in six (6) of the seven (7) soil samples and exceeded the NMAC screening criteria of 600 mg/kg in two (2) of the samples.

TPH was detected above the MDL in one (1) of the seven (7) soil samples and exceeded the NMAC screening criteria of 100 mg/kg.

SAR results ranged from 0.19 to 0.26. Soil is defined as "unsuitable" by the NMSLO Revegetation Guidelines Handbook if SAR is above 15.

For Percent Calcium Carbonate, the NMSLO Revegetation Guidelines Handbook classifies soil suitability as good if the percentage ranges from 0% to 15%. The single Percent Calcium Carbonate sample result was 0.3%. The complete analytical report is provided in **Appendix D**.

**Table 2 - Sample Results**

November 15, 2023					
Sample ID	BTEX (mg/kg)	Chloride (mg/kg)	TPH (GRO, DRO, ORO C6-C36) (mg/kg)	SAR NA	Percent Calcium Carbonate (%)
PQ82-SS01	ND	ND	ND	0.19	0.3
PQ82-SS02	ND	3,640	ND	-	-
PQ82-SS03	ND	3,160	626	-	-
PQ82-SS04	ND	464	ND	-	-
PQ82-SS05	ND	16	ND	-	-
PQ82-SS06	ND	16	ND	-	-
PQ82-SS07	ND	16	ND	0.26	-
<p><b>Screening levels established for sites with depths to groundwater less than 50' as defined in 19.15.29 NMAC.</b></p> <p><b>Bold and highlighted</b> results exceed applicable screening levels.</p> <p>ND - Not detected above the method detection limit.</p> <p>Benzene: 10 mg/kg</p> <p>BTEX: 50 mg/kg</p> <p>Chloride: 600 mg/kg</p> <p>TPH (C6-C36): 100 mg/kg</p> <p>*SAR and Percent Calcium Carbonate sampled to determine soil suitability for revegetation.</p>					

## 3. Reclamation Plan

### 3.1 Equipment Removal

All surface equipment and debris will be removed per applicable NMSLO rules, and all equipment disposed of in accordance with state law.

Three (3) pole-mounted transformers were present at the southwestern edge of the site. The condition of these transformers was not evaluated during the site visit, but their presumed age warrants further evaluation for safe removal and disposal of any potentially hazardous waste. The transformer oil will be sampled for PCBs on-site during reclamation to determine appropriate transportation and disposal.

### 3.2 Soil Excavation

Following the removal of remaining equipment and approval of the excavation plans, the contaminants of concerns will be removed from each site in the following manner:

Based on site characterization sampling, the two (2) areas with regulatory exceedances will be excavated with soil removed from the facility for regulated disposal. The total depth and width of the excavation will be delineated in the field and confirmed by laboratory analysis of composite samples. Composite samples will be collected at a rate of one (1) 5-point composite sample per 200 square feet of soil. Composite samples will be collected from the excavated areas for analysis of TPH, and Chloride to confirm that the underlying soils comply with the NMAC closure criteria. Any remaining, non-compliant material will be removed for regulated disposal.

### 3.3 Soil Preparation

The areas subject to reclamation include all disturbed areas and the well pad and a portion of the access road. The caliche well pad will be cross-ripped to a depth of 18 inches.

The surface area will be tilled or disced to prepare a proper seedbed. During tilling, the soil will be amended with clean soil as needed to infill low areas or correct soil deficiencies. During soil preparation, the original landform will be restored, as best as possible, for all unvegetated areas. Areas vegetated with native grasses or shrubs will remain undisturbed during reclamation activities.

### 3.4 Site Revegetation Plan

The prepared soils within the site will be seeded with a seed mix purchased from a New Mexico Department of Agriculture (NMDA) licensed dealer. Soil at the East Pearl Queen Unit #82 is characterized as fine sandy loam, which corresponds with the following NMSLO Sandy Loam (SL) seed mixture:



- Galleta Grass
- Little Bluestem
- Blue Grama
- Sideoats Grama
- Sand Dropseed

Following seeding operations, the seed tags will be made available to the NMSLO, along with a copy of the materials certification. The seed mixture will be applied by drill-seeding at the rates recommended in the NMSLO Revegetation Guidelines Handbook for Southeastern New Mexico. The seeded area will be mulched and/or irrigated if deemed necessary and monitored to verify germination. Following germination, the vegetation at the site will be monitored for successful establishment on an annual basis for a period of three (3) years. Noxious weeds will be monitored in spring and fall during the same three (3) year period. Following revegetation, posts and signage will be staked at the end of the former access roads to prevent trespassing.

### 3.5 Schedule of Implementation

The preliminary implementation schedule is presented below. The schedule will be amended as necessary pending approval from NMSLO. Revegetation is tentatively planned for the time period prior to the summer monsoon season, as recommended by the NMSLO Revegetation Guidelines Handbook for Southeastern New Mexico.

**Table 3 – Reclamation Schedule**

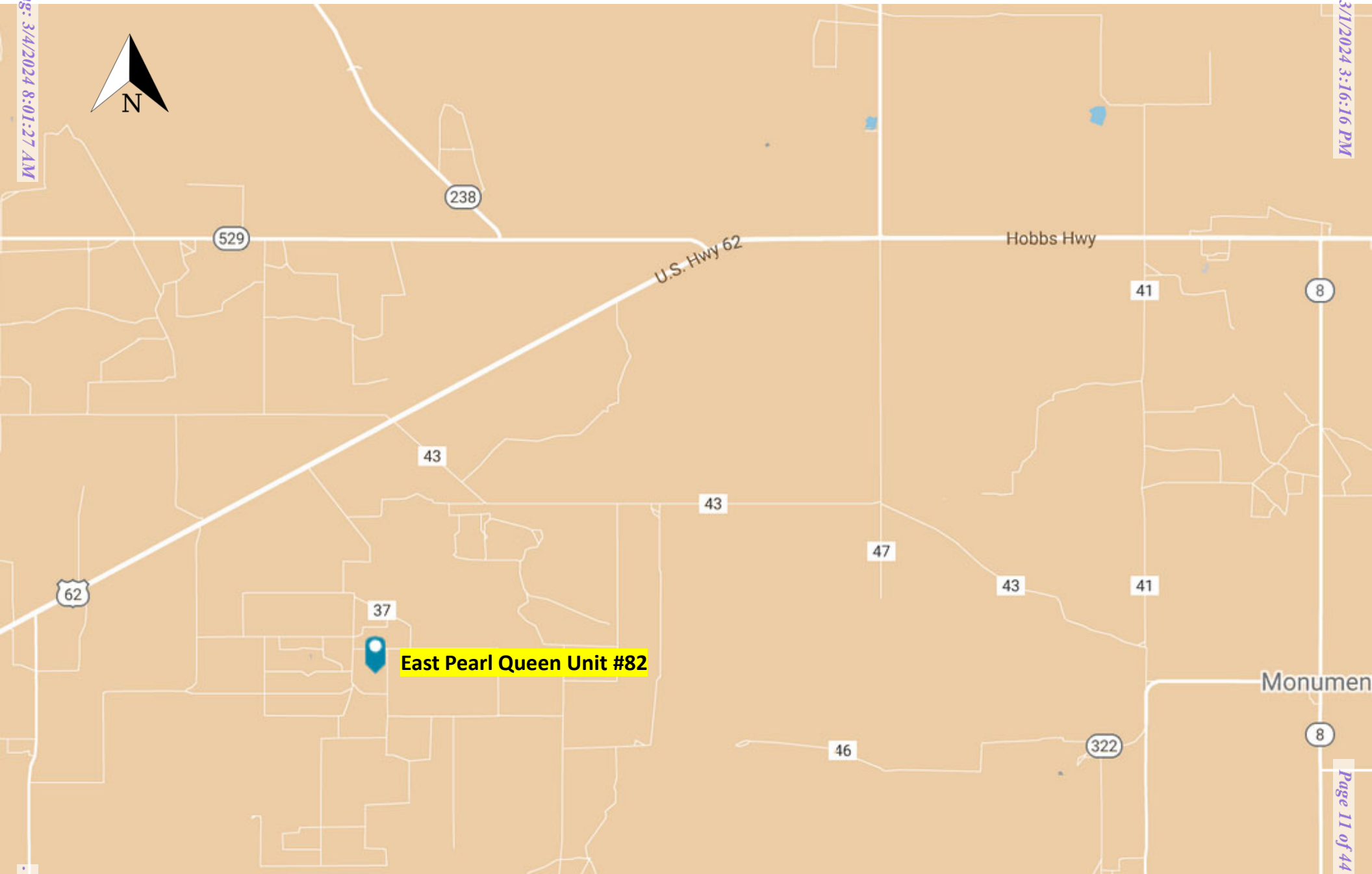
<b>Activity</b>	<b>Planned Start</b>
Equipment Removal	February - March 2024
Excavation/Soil Preparation	March - April 2024
Revegetation*	May - June 2024

\*Vegetation will be monitored for a three (3) year period.

## **Appendix A**

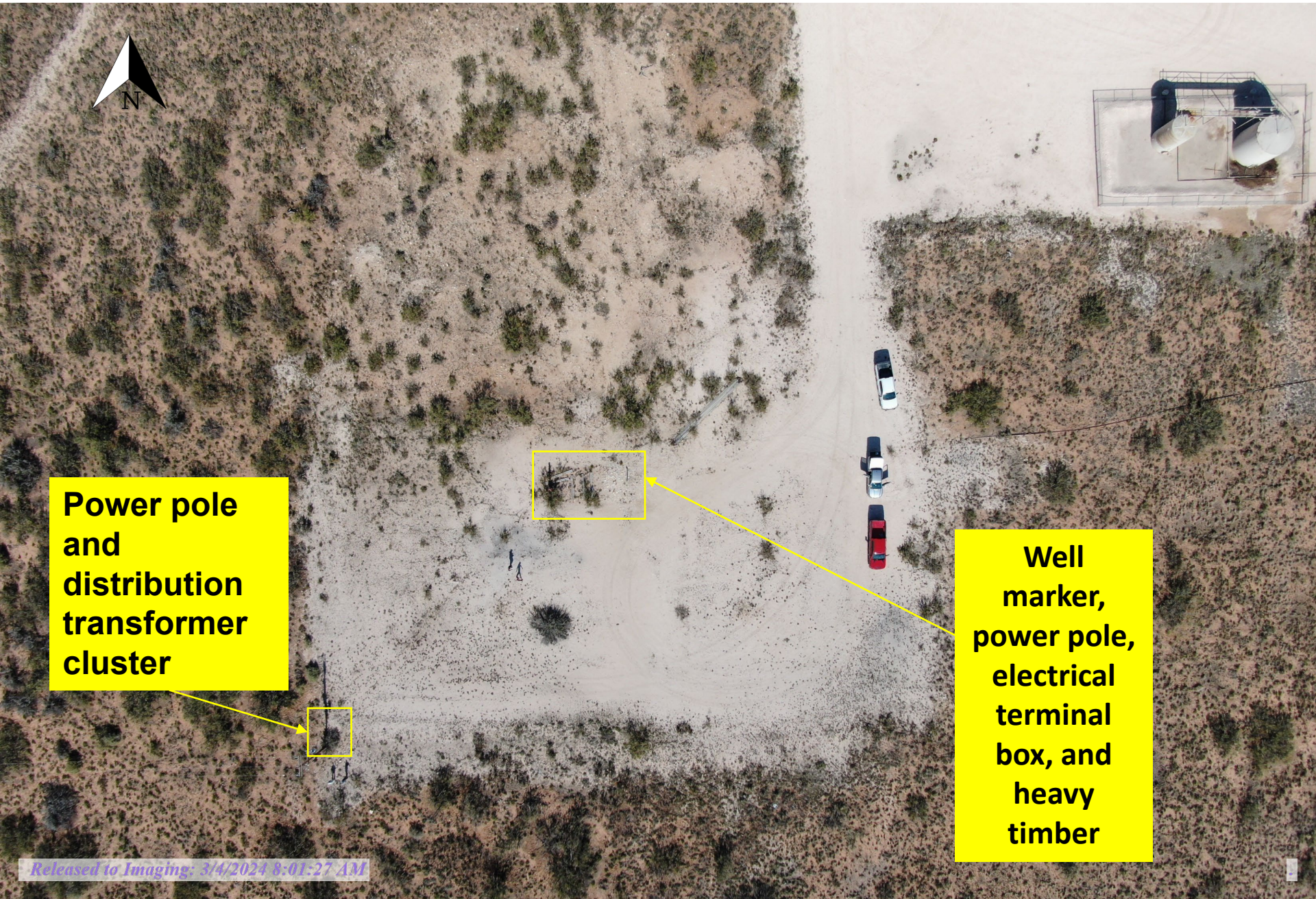
### **Figures 1-5**

Figure 1 – Site Location Map





**Figure 2 – Site Layout Map  
East Pearl Queen Unit #82**

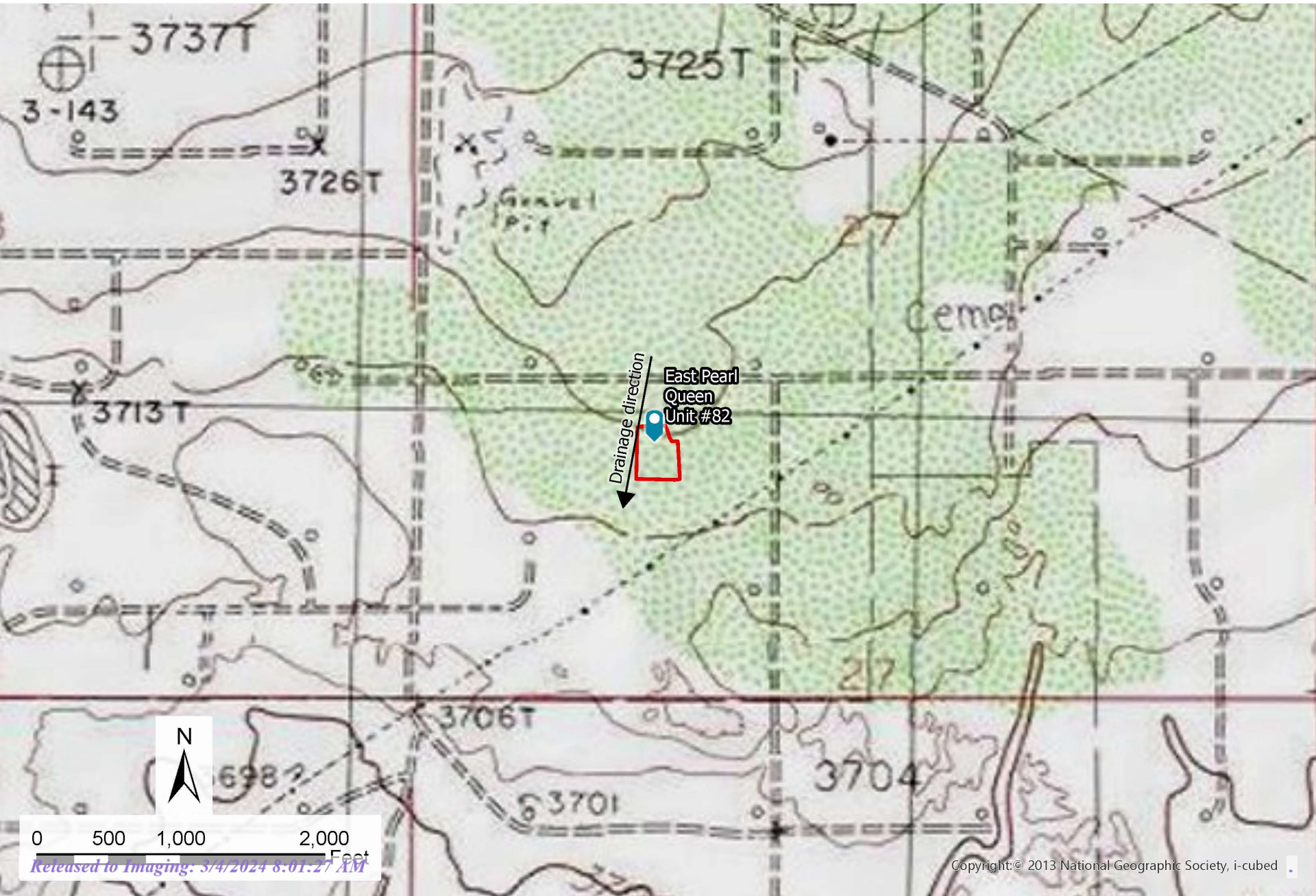


**Power pole  
and  
distribution  
transformer  
cluster**

**Well  
marker,  
power pole,  
electrical  
terminal  
box, and  
heavy  
timber**

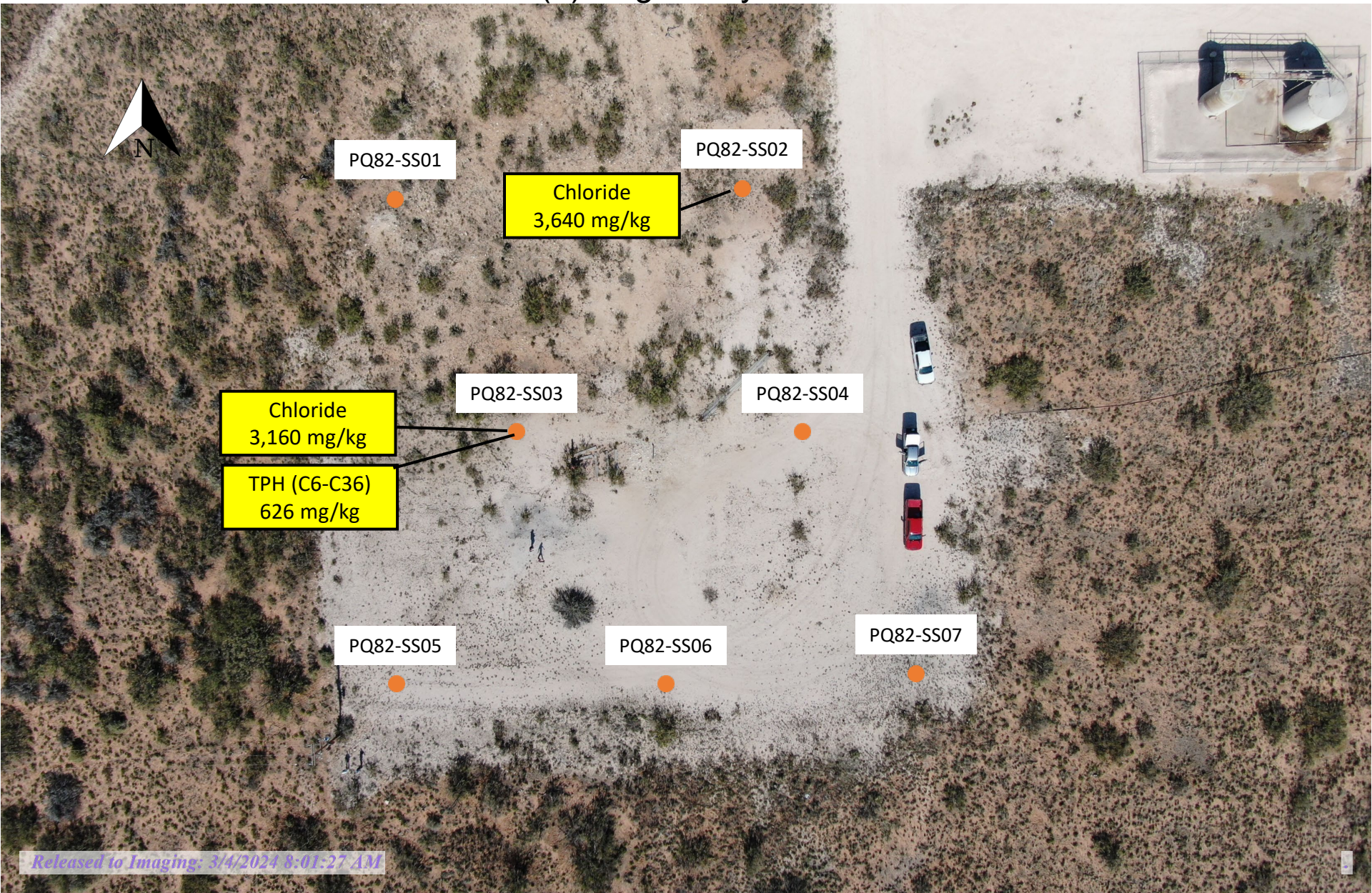


**Figure 3 - Topographic Map  
East Pearl Queen Unit #82**






# Figure 4 – Sample Locations and Exceedances Map East Pearl Queen Unit #82 Three (3) Regulatory Exceedances





## Figure 5 – Reclamation Map East Pearl Queen Unit #82



 Reclamation Area



## **Appendix B**

## **Photographs**





- Photo 1: Plugged well marker at East Pearl Queen Unit #82.



- Photo 2: Distribution transformer cluster at southwest edge of East Pearl Queen Unit #82.



- Photo 3: Alternate view of distribution transformer cluster at East Pearl Queen Unit #82.



- Photo 4: Base of power pole holding distribution transformer cluster at East Pearl Queen Unit #82. No staining noted.



- Photo 5: View of East Pearl Queen Unit #82 facing northeast.



- Photo 6: Power pole and electrical terminal box near well marker of East Pearl Queen Unit #82.





- Photo 7: Alternate view of power pole and electrical terminal box near well marker of East Pearl Queen Unit #82.



- Photo 8: View of East Pearl Queen Unit #82 facing southwest.



- Photo 9: View of East Pearl Queen Unit #82 facing east. Fiberglass sucker rods are staged near the image center.

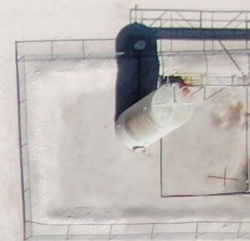
## **Appendix C**

### **Drone Photograph**





# East Pearl Queen Unit #82





## **Appendix D**

### **Laboratory Report**

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

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December 01, 2023

SCOTT MEIER

ALL CONSULTING, LLC

1718 S. CHEYENNE AVE.

TULSA, OK 74119

RE: FME

Enclosed are the results of analyses for samples received by the laboratory on 11/15/23 14:50.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. 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/ga/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/ga/lab_accred_certif.html).

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

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

Cardinal Laboratories is accredited through the State of New Mexico Environment Department for:

Method SM 9223-B	Total Coliform and E. coli (Colilert MMO-MUG)
Method EPA 524.2	Regulated VOCs and Total Trihalomethanes (TTHM)
Method EPA 552.2	Total Haloacetic Acids (HAA-5)

Accreditation applies to public drinking water matrices for State of Colorado and New Mexico.

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,

Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

ALL CONSULTING, LLC  
1718 S. CHEYENNE AVE.  
TULSA OK, 74119

Project: FME  
Project Number: 1893  
Project Manager: SCOTT MEIER  
Fax To: NA

Reported:  
01-Dec-23 16:30

**PQ 82 - SS 01**  
**H236254-12 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

Chloride	<16.0		16.0	mg/kg	4	3111720	HM	17-Nov-23	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	3111622	JH/	16-Nov-23	8021B	
Toluene*	<0.050		0.050	mg/kg	50	3111622	JH/	16-Nov-23	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	3111622	JH/	16-Nov-23	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	3111622	JH/	16-Nov-23	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	3111622	JH/	16-Nov-23	8021B	

Surrogate: 4-Bromofluorobenzene (PID) 112 % 71.5-134 3111622 JH/ 16-Nov-23 8021B

**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	3111548	MS	16-Nov-23	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	3111548	MS	16-Nov-23	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	3111548	MS	16-Nov-23	8015B	

Surrogate: 1-Chlorooctane 90.2 % 48.2-134 3111548 MS 16-Nov-23 8015B

Surrogate: 1-Chlorooctadecane 95.6 % 49.1-148 3111548 MS 16-Nov-23 8015B

**Green Analytical Laboratories****Saturated Paste Extraction**

Calcium	40.9		0.500	mg/L	5	B233484	AES	28-Nov-23	EPA200.7	
Magnesium	6.29		0.500	mg/L	5	B233484	AES	28-Nov-23	EPA200.7	
SAR	0.19			No Unit	1	B233484	AES	28-Nov-23	Calculation	
Sodium	5.07		5.00	mg/L	5	B233484	AES	28-Nov-23	EPA200.7	

**Acid Base Accounting**

Carbonate	0.300			%	1	B233543	IDB	28-Nov-23	Modified Sobek	
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Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager





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**Analytical Results For:**

ALL CONSULTING, LLC  
1718 S. CHEYENNE AVE.  
TULSA OK, 74119

Project: FME  
Project Number: 1893  
Project Manager: SCOTT MEIER  
Fax To: NA

Reported:  
01-Dec-23 16:30

**PQ 82 - SS 02**  
**H236254-13 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

<b>Chloride</b>	<b>3640</b>		16.0	mg/kg	4	3111720	HM	17-Nov-23	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	3111622	JH/	16-Nov-23	8021B	
Toluene*	<0.050		0.050	mg/kg	50	3111622	JH/	16-Nov-23	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	3111622	JH/	16-Nov-23	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	3111622	JH/	16-Nov-23	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	3111622	JH/	16-Nov-23	8021B	
Surrogate: 4-Bromofluorobenzene (PID)			112 %	71.5-134		3111622	JH/	16-Nov-23	8021B	

**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	3111548	MS	16-Nov-23	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	3111548	MS	16-Nov-23	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	3111548	MS	16-Nov-23	8015B	
Surrogate: 1-Chlorooctane			91.4 %	48.2-134		3111548	MS	16-Nov-23	8015B	
Surrogate: 1-Chlorooctadecane			93.6 %	49.1-148		3111548	MS	16-Nov-23	8015B	

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\*=Accredited Analyte

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**Analytical Results For:**

ALL CONSULTING, LLC  
1718 S. CHEYENNE AVE.  
TULSA OK, 74119

Project: FME  
Project Number: 1893  
Project Manager: SCOTT MEIER  
Fax To: NA

Reported:  
01-Dec-23 16:30

**PQ 82 - SS 03**  
**H236254-14 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

<b>Chloride</b>	<b>3160</b>		16.0	mg/kg	4	3111720	HM	17-Nov-23	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	3111622	JH/	17-Nov-23	8021B	
Toluene*	<0.050		0.050	mg/kg	50	3111622	JH/	17-Nov-23	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	3111622	JH/	17-Nov-23	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	3111622	JH/	17-Nov-23	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	3111622	JH/	17-Nov-23	8021B	

Surrogate: 4-Bromofluorobenzene (PID) 106 % 71.5-134 3111622 JH/ 17-Nov-23 8021B

**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	3111548	MS	16-Nov-23	8015B	
<b>DRO &gt;C10-C28*</b>	<b>432</b>		10.0	mg/kg	1	3111548	MS	16-Nov-23	8015B	
<b>EXT DRO &gt;C28-C36</b>	<b>194</b>		10.0	mg/kg	1	3111548	MS	16-Nov-23	8015B	

Surrogate: 1-Chlorooctane 90.9 % 48.2-134 3111548 MS 16-Nov-23 8015B

Surrogate: 1-Chlorooctadecane 125 % 49.1-148 3111548 MS 16-Nov-23 8015B

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

ALL CONSULTING, LLC  
1718 S. CHEYENNE AVE.  
TULSA OK, 74119

Project: FME  
Project Number: 1893  
Project Manager: SCOTT MEIER  
Fax To: NA

Reported:  
01-Dec-23 16:30

**PQ 82 - SS 04**  
**H236254-15 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

<b>Chloride</b>	<b>464</b>		16.0	mg/kg	4	3111720	HM	17-Nov-23	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	3111622	JH/	17-Nov-23	8021B	
Toluene*	<0.050		0.050	mg/kg	50	3111622	JH/	17-Nov-23	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	3111622	JH/	17-Nov-23	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	3111622	JH/	17-Nov-23	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	3111622	JH/	17-Nov-23	8021B	

<i>Surrogate: 4-Bromofluorobenzene (PID)</i>			110 %		71.5-134	3111622	JH/	17-Nov-23	8021B	
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	3111548	MS	17-Nov-23	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	3111548	MS	17-Nov-23	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	3111548	MS	17-Nov-23	8015B	

<i>Surrogate: 1-Chlorooctane</i>			83.4 %		48.2-134	3111548	MS	17-Nov-23	8015B	
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<i>Surrogate: 1-Chlorooctadecane</i>			87.0 %		49.1-148	3111548	MS	17-Nov-23	8015B	
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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

ALL CONSULTING, LLC  
1718 S. CHEYENNE AVE.  
TULSA OK, 74119

Project: FME  
Project Number: 1893  
Project Manager: SCOTT MEIER  
Fax To: NA

Reported:  
01-Dec-23 16:30

**PQ 82 - SS 05**  
**H236254-16 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

Chloride	16.0		16.0	mg/kg	4	3111720	HM	17-Nov-23	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	3111622	JH/	17-Nov-23	8021B	
Toluene*	<0.050		0.050	mg/kg	50	3111622	JH/	17-Nov-23	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	3111622	JH/	17-Nov-23	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	3111622	JH/	17-Nov-23	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	3111622	JH/	17-Nov-23	8021B	

Surrogate: 4-Bromofluorobenzene (PID)			111 %		71.5-134	3111622	JH/	17-Nov-23	8021B	
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	3111548	MS	17-Nov-23	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	3111548	MS	17-Nov-23	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	3111548	MS	17-Nov-23	8015B	

Surrogate: 1-Chlorooctane			81.9 %		48.2-134	3111548	MS	17-Nov-23	8015B	
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Surrogate: 1-Chlorooctadecane			85.0 %		49.1-148	3111548	MS	17-Nov-23	8015B	
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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

ALL CONSULTING, LLC  
1718 S. CHEYENNE AVE.  
TULSA OK, 74119

Project: FME  
Project Number: 1893  
Project Manager: SCOTT MEIER  
Fax To: NA

Reported:  
01-Dec-23 16:30

**PQ 82 - SS 06**  
**H236254-17 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

Chloride	16.0		16.0	mg/kg	4	3111720	HM	17-Nov-23	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	3111622	JH/	17-Nov-23	8021B	
Toluene*	<0.050		0.050	mg/kg	50	3111622	JH/	17-Nov-23	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	3111622	JH/	17-Nov-23	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	3111622	JH/	17-Nov-23	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	3111622	JH/	17-Nov-23	8021B	
Surrogate: 4-Bromofluorobenzene (PID)			111 %	71.5-134		3111622	JH/	17-Nov-23	8021B	

**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	3111548	MS	17-Nov-23	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	3111548	MS	17-Nov-23	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	3111548	MS	17-Nov-23	8015B	
Surrogate: 1-Chlorooctane			96.5 %	48.2-134		3111548	MS	17-Nov-23	8015B	
Surrogate: 1-Chlorooctadecane			99.3 %	49.1-148		3111548	MS	17-Nov-23	8015B	

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

ALL CONSULTING, LLC  
1718 S. CHEYENNE AVE.  
TULSA OK, 74119

Project: FME  
Project Number: 1893  
Project Manager: SCOTT MEIER  
Fax To: NA

Reported:  
01-Dec-23 16:30

**PQ 82 - SS 07**  
**H236254-18 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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**Cardinal Laboratories****Inorganic Compounds**

<b>Chloride</b>	<b>16.0</b>		16.0	mg/kg	4	3111720	HM	17-Nov-23	4500-Cl-B	
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**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050		0.050	mg/kg	50	3111623	JH/	16-Nov-23	8021B	
Toluene*	<0.050		0.050	mg/kg	50	3111623	JH/	16-Nov-23	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	3111623	JH/	16-Nov-23	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	3111623	JH/	16-Nov-23	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	3111623	JH/	16-Nov-23	8021B	

<i>Surrogate: 4-Bromofluorobenzene (PID)</i>			101 %		71.5-134	3111623	JH/	16-Nov-23	8021B	
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0		10.0	mg/kg	1	3111549	MS	16-Nov-23	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	3111549	MS	16-Nov-23	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	3111549	MS	16-Nov-23	8015B	

<i>Surrogate: 1-Chlorooctane</i>			77.2 %		48.2-134	3111549	MS	16-Nov-23	8015B	
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<i>Surrogate: 1-Chlorooctadecane</i>			71.6 %		49.1-148	3111549	MS	16-Nov-23	8015B	
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**Green Analytical Laboratories****Saturated Paste Extraction**

<b>Calcium</b>	<b>54.7</b>		0.500	mg/L	5	B233484	AES	28-Nov-23	EPA200.7	
<b>Magnesium</b>	<b>6.20</b>		0.500	mg/L	5	B233484	AES	28-Nov-23	EPA200.7	
<b>SAR</b>	<b>0.26</b>			No Unit	1	B233484	AES	28-Nov-23	Calculation	
<b>Sodium</b>	<b>7.50</b>		5.00	mg/L	5	B233484	AES	28-Nov-23	EPA200.7	

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

ALL CONSULTING, LLC  
1718 S. CHEYENNE AVE.  
TULSA OK, 74119

Project: FME  
Project Number: 1893  
Project Manager: SCOTT MEIER  
Fax To: NA

Reported:  
01-Dec-23 16:30

**Inorganic Compounds - Quality Control****Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 3111720 - 1:4 DI Water****Blank (3111720-BLK1)**

Prepared &amp; Analyzed: 17-Nov-23

Chloride	ND	16.0	mg/kg							
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**LCS (3111720-BS1)**

Prepared &amp; Analyzed: 17-Nov-23

Chloride	416	16.0	mg/kg	400		104	80-120			
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**LCS Dup (3111720-BSD1)**

Prepared &amp; Analyzed: 17-Nov-23

Chloride	432	16.0	mg/kg	400		108	80-120	3.77	20	
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**Batch 3111729 - 1:4 DI Water****Blank (3111729-BLK1)**

Prepared &amp; Analyzed: 17-Nov-23

Chloride	ND	16.0	mg/kg							
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**LCS (3111729-BS1)**

Prepared &amp; Analyzed: 17-Nov-23

Chloride	432	16.0	mg/kg	400		108	80-120			
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**LCS Dup (3111729-BSD1)**

Prepared &amp; Analyzed: 17-Nov-23

Chloride	416	16.0	mg/kg	400		104	80-120	3.77	20	
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\*=Accredited Analyte

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**Analytical Results For:**

ALL CONSULTING, LLC  
1718 S. CHEYENNE AVE.  
TULSA OK, 74119

Project: FME  
Project Number: 1893  
Project Manager: SCOTT MEIER  
Fax To: NA

Reported:  
01-Dec-23 16:30

**Volatile Organic Compounds by EPA Method 8021 - Quality Control****Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 3111622 - Volatiles****Blank (3111622-BLK1)**

Prepared &amp; Analyzed: 16-Nov-23

Benzene	ND	0.050	mg/kg							
Toluene	ND	0.050	mg/kg							
Ethylbenzene	ND	0.050	mg/kg							
Total Xylenes	ND	0.150	mg/kg							
Total BTEX	ND	0.300	mg/kg							
Surrogate: 4-Bromofluorobenzene (PID)	0.0567		mg/kg	0.0500		113	71.5-134			

**LCS (3111622-BS1)**

Prepared &amp; Analyzed: 16-Nov-23

Benzene	1.84	0.050	mg/kg	2.00		92.2	82.8-130			
Toluene	1.98	0.050	mg/kg	2.00		98.8	86-128			
Ethylbenzene	1.99	0.050	mg/kg	2.00		99.4	85.9-128			
m,p-Xylene	4.03	0.100	mg/kg	4.00		101	89-129			
o-Xylene	1.98	0.050	mg/kg	2.00		99.0	86.1-125			
Total Xylenes	6.01	0.150	mg/kg	6.00		100	88.2-128			
Surrogate: 4-Bromofluorobenzene (PID)	0.0533		mg/kg	0.0500		107	71.5-134			

**LCS Dup (3111622-BSD1)**

Prepared &amp; Analyzed: 16-Nov-23

Benzene	1.84	0.050	mg/kg	2.00		91.9	82.8-130	0.348	15.8	
Toluene	2.00	0.050	mg/kg	2.00		99.9	86-128	1.09	15.9	
Ethylbenzene	2.01	0.050	mg/kg	2.00		100	85.9-128	0.889	16	
m,p-Xylene	4.08	0.100	mg/kg	4.00		102	89-129	1.41	16.2	
o-Xylene	2.01	0.050	mg/kg	2.00		100	86.1-125	1.35	16.7	
Total Xylenes	6.09	0.150	mg/kg	6.00		101	88.2-128	1.39	16.3	
Surrogate: 4-Bromofluorobenzene (PID)	0.0529		mg/kg	0.0500		106	71.5-134			

**Batch 3111623 - Volatiles****Blank (3111623-BLK1)**

Prepared &amp; Analyzed: 16-Nov-23

Benzene	ND	0.050	mg/kg							
Toluene	ND	0.050	mg/kg							
Ethylbenzene	ND	0.050	mg/kg							
Total Xylenes	ND	0.150	mg/kg							

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**Analytical Results For:**

ALL CONSULTING, LLC  
1718 S. CHEYENNE AVE.  
TULSA OK, 74119

Project: FME  
Project Number: 1893  
Project Manager: SCOTT MEIER  
Fax To: NA

Reported:  
01-Dec-23 16:30

**Volatile Organic Compounds by EPA Method 8021 - Quality Control****Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 3111623 - Volatiles****Blank (3111623-BLK1)**

Prepared &amp; Analyzed: 16-Nov-23

Total BTEX	ND	0.300	mg/kg							
Surrogate: 4-Bromofluorobenzene (PID)	0.0528		mg/kg	0.0500		106	71.5-134			

**LCS (3111623-BS1)**

Prepared &amp; Analyzed: 16-Nov-23

Benzene	1.99	0.050	mg/kg	2.00		99.7	82.8-130			
Toluene	1.96	0.050	mg/kg	2.00		97.9	86-128			
Ethylbenzene	2.05	0.050	mg/kg	2.00		102	85.9-128			
m,p-Xylene	4.07	0.100	mg/kg	4.00		102	89-129			
o-Xylene	2.04	0.050	mg/kg	2.00		102	86.1-125			
Total Xylenes	6.11	0.150	mg/kg	6.00		102	88.2-128			
Surrogate: 4-Bromofluorobenzene (PID)	0.0519		mg/kg	0.0500		104	71.5-134			

**LCS Dup (3111623-BSD1)**

Prepared &amp; Analyzed: 16-Nov-23

Benzene	2.00	0.050	mg/kg	2.00		100	82.8-130	0.311	15.8	
Toluene	1.99	0.050	mg/kg	2.00		99.6	86-128	1.78	15.9	
Ethylbenzene	2.08	0.050	mg/kg	2.00		104	85.9-128	1.79	16	
m,p-Xylene	4.18	0.100	mg/kg	4.00		104	89-129	2.67	16.2	
o-Xylene	2.09	0.050	mg/kg	2.00		104	86.1-125	2.33	16.7	
Total Xylenes	6.26	0.150	mg/kg	6.00		104	88.2-128	2.55	16.3	
Surrogate: 4-Bromofluorobenzene (PID)	0.0524		mg/kg	0.0500		105	71.5-134			

Cardinal Laboratories

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

ALL CONSULTING, LLC  
1718 S. CHEYENNE AVE.  
TULSA OK, 74119

Project: FME  
Project Number: 1893  
Project Manager: SCOTT MEIER  
Fax To: NA

Reported:  
01-Dec-23 16:30

**Petroleum Hydrocarbons by GC FID - Quality Control****Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC Limits	RPD	RPD Limit	Notes
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**Batch 3111548 - General Prep - Organics****Blank (3111548-BLK1)**

Prepared: 15-Nov-23 Analyzed: 16-Nov-23

GRO C6-C10	ND	10.0	mg/kg						
DRO >C10-C28	ND	10.0	mg/kg						
EXT DRO >C28-C36	ND	10.0	mg/kg						
Surrogate: 1-Chlorooctane	40.4		mg/kg	50.0		80.8	48.2-134		
Surrogate: 1-Chlorooctadecane	41.1		mg/kg	50.0		82.2	49.1-148		

**LCS (3111548-BS1)**

Prepared: 15-Nov-23 Analyzed: 16-Nov-23

GRO C6-C10	189	10.0	mg/kg	200		94.6	66.4-123		
DRO >C10-C28	185	10.0	mg/kg	200		92.7	66.5-118		
Total TPH C6-C28	374	10.0	mg/kg	400		93.6	77.6-123		
Surrogate: 1-Chlorooctane	43.2		mg/kg	50.0		86.4	48.2-134		
Surrogate: 1-Chlorooctadecane	40.7		mg/kg	50.0		81.4	49.1-148		

**LCS Dup (3111548-BS1)**

Prepared: 15-Nov-23 Analyzed: 16-Nov-23

GRO C6-C10	185	10.0	mg/kg	200		92.7	66.4-123	2.00	17.7
DRO >C10-C28	181	10.0	mg/kg	200		90.6	66.5-118	2.21	21
Total TPH C6-C28	367	10.0	mg/kg	400		91.7	77.6-123	2.10	18.5
Surrogate: 1-Chlorooctane	42.6		mg/kg	50.0		85.2	48.2-134		
Surrogate: 1-Chlorooctadecane	40.4		mg/kg	50.0		80.7	49.1-148		

**Batch 3111549 - General Prep - Organics****Blank (3111549-BLK1)**

Prepared: 15-Nov-23 Analyzed: 16-Nov-23

GRO C6-C10	ND	10.0	mg/kg						
DRO >C10-C28	ND	10.0	mg/kg						
EXT DRO >C28-C36	ND	10.0	mg/kg						
Surrogate: 1-Chlorooctane	39.7		mg/kg	50.0		79.3	48.2-134		
Surrogate: 1-Chlorooctadecane	36.9		mg/kg	50.0		73.7	49.1-148		

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

ALL CONSULTING, LLC  
1718 S. CHEYENNE AVE.  
TULSA OK, 74119

Project: FME  
Project Number: 1893  
Project Manager: SCOTT MEIER  
Fax To: NA

Reported:  
01-Dec-23 16:30

**Petroleum Hydrocarbons by GC FID - Quality Control****Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 3111549 - General Prep - Organics****LCS (3111549-BS1)**

Prepared: 15-Nov-23 Analyzed: 17-Nov-23

GRO C6-C10	193	10.0	mg/kg	200		96.7	66.4-123			
DRO >C10-C28	187	10.0	mg/kg	200		93.3	66.5-118			
Total TPH C6-C28	380	10.0	mg/kg	400		95.0	77.6-123			
Surrogate: 1-Chlorooctane	41.1		mg/kg	50.0		82.2	48.2-134			
Surrogate: 1-Chlorooctadecane	39.9		mg/kg	50.0		79.8	49.1-148			

**LCS Dup (3111549-BSD1)**

Prepared: 15-Nov-23 Analyzed: 16-Nov-23

GRO C6-C10	192	10.0	mg/kg	200		96.0	66.4-123	0.823	17.7	
DRO >C10-C28	171	10.0	mg/kg	200		85.4	66.5-118	8.81	21	
Total TPH C6-C28	363	10.0	mg/kg	400		90.7	77.6-123	4.67	18.5	
Surrogate: 1-Chlorooctane	40.3		mg/kg	50.0		80.7	48.2-134			
Surrogate: 1-Chlorooctadecane	39.6		mg/kg	50.0		79.2	49.1-148			

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**Analytical Results For:**

ALL CONSULTING, LLC  
1718 S. CHEYENNE AVE.  
TULSA OK, 74119

Project: FME  
Project Number: 1893  
Project Manager: SCOTT MEIER  
Fax To: NA

Reported:  
01-Dec-23 16:30

**Saturated Paste Extraction - Quality Control****Green Analytical Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch B233484 - General Prep-SOILS****Blank (B233484-BLK1)**

Prepared: 20-Nov-23 Analyzed: 28-Nov-23

Calcium	ND	0.100	mg/L							
Magnesium	ND	0.100	mg/L							
SAR	0.00		No Unit							
Sodium	ND	1.00	mg/L							

**Reference (B233484-SRM1)**

Prepared: 20-Nov-23 Analyzed: 28-Nov-23

SAR	5.69		No Unit	6.20		91.8	90-110			
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Notes and Definitions

- 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

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A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager

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**Oil Conservation Division**  
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QUESTIONS  
  
Action 319423

QUESTIONS

Operator: Franklin Mountain Energy 3, LLC 44 Cook Street Denver, CO 80206	OGRID:
	331595
	Action Number:
	319423
Action Type:	
[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)	

QUESTIONS

Prerequisites	
Incident ID (n#)	nCOH0807051992
Incident Name	NCOH0807051992 EAST PEARL QUEEN UNIT #082 @ 30-025-31121
Incident Type	Oil Release
Incident Status	Remediation Plan Received
Incident Well	[30-025-31121] EAST PEARL QUEEN UNIT #082

Location of Release Source	
Please answer all the questions in this group.	
Site Name	EAST PEARL QUEEN UNIT #082
Date Release Discovered	02/08/2008
Surface Owner	State

Incident Details	
Please answer all the questions in this group.	
Incident Type	Oil Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Cause: Other   Unknown   Crude Oil   Released: 0 BBL (Unknown Released Amount)   Recovered: 0 BBL   Lost: 0 BBL.
Produced Water Released (bbls) Details	Cause: Other   Unknown   Produced Water   Released: 0 BBL   Recovered: 0 BBL   Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Cause: Other   Unknown   Condensate   Released: 0 BBL   Recovered: 0 BBL   Lost: 0 BBL.
Natural Gas Vented (Mcf) Details	Cause: Other   Unknown   Natural Gas Vented   Released: 0 Mcf   Recovered: 0 Mcf   Lost: 0 Mcf.
Natural Gas Flared (Mcf) Details	Cause: Other   Unknown   Natural Gas Flared   Released: 0 Mcf   Recovered: 0 Mcf   Lost: 0 Mcf.
Other Released Details	Cause: Other   Unknown   Unknown   Released: 0 GAL   Recovered: 0 GAL   Lost: 0 GAL.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	The supposed released occurred during February 2008, while under operatorship of Xeric Oil and Gas. Franklin Mountain Energy 3, LLC has no affiliation with the East Pearl Queen Unit #82. Reclamation of the site is being required by NM SLO.

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QUESTIONS, Page 2

Action 319423

**QUESTIONS (continued)**

Operator: Franklin Mountain Energy 3, LLC 44 Cook Street Denver, CO 80206	OGRID:	331595
	Action Number:	319423
	Action Type:	[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**QUESTIONS**

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

**Initial Response**

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

The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	All noted actions have been completed.

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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.

I hereby agree and sign off to the above statement	Name: Rachael Overbey Title: Project Manager Email: roverbey@fmlc.com Date: 03/01/2024
--	---

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QUESTIONS, Page 3

Action 319423

**QUESTIONS (continued)**

Operator: Franklin Mountain Energy 3, LLC 44 Cook Street Denver, CO 80206	OGRID:	331595
	Action Number:	319423
	Action Type:	[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**QUESTIONS****Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). 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 in feet below ground surface (ft bgs)	Less than or equal 25 (ft.)
What method was used to determine the depth to ground water	U.S. Geological Survey
Did this release impact groundwater or surface water	No
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Between 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between ½ and 1 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	Between 1 and 5 (mi.)
An (non-karst) unstable area	Between 1 and 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Between 1 and 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

**Remediation Plan**

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

Requesting a remediation plan approval with this submission	Yes
Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No

**Soil Contamination Sampling:** (Provide the highest observable value for each, in milligrams per kilograms.)

Chloride	(EPA 300.0 or SM4500 Cl B)	3640
TPH (GRO+DRO+MRO)	(EPA SW-846 Method 8015M)	626
GRO+DRO	(EPA SW-846 Method 8015M)	626
BTEX	(EPA SW-846 Method 8021B or 8260B)	0
Benzene	(EPA SW-846 Method 8021B or 8260B)	0

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.

On what estimated date will the remediation commence	03/05/2024
On what date will (or did) the final sampling or liner inspection occur	03/05/2024
On what date will (or was) the remediation complete(d)	03/05/2024
What is the estimated surface area (in square feet) that will be reclaimed	400
What is the estimated volume (in cubic yards) that will be reclaimed	14.8
What is the estimated surface area (in square feet) that will be remediated	400
What is the estimated volume (in cubic yards) that will be remediated	14.8

These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.



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QUESTIONS, Page 4

Action 319423

**QUESTIONS (continued)**

Operator: Franklin Mountain Energy 3, LLC 44 Cook Street Denver, CO 80206	OGRID:	331595
	Action Number:	319423
	Action Type:	[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**QUESTIONS**

<b>Remediation Plan (continued)</b>	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
<b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>	
<i>(Select all answers below that apply.)</i>	
(Ex Situ) Excavation and <b>off-site</b> disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for <b>off-site</b> disposal	R360 Artesia LLC LANDFARM [FEEM0112340644]
<b>OR</b> which OCD approved well (API) will be used for <b>off-site</b> disposal	Not answered.
<b>OR</b> is the <b>off-site</b> disposal site, to be used, out-of-state	No
<b>OR</b> is the <b>off-site</b> disposal site, to be used, an NMED facility	No
(Ex Situ) Excavation and <b>on-site</b> remediation (i.e. On-Site Land Farms)	No
(In Situ) Soil Vapor Extraction	No
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	No
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	No
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	No
Ground Water Abatement pursuant to 19.15.30 NMAC	No
OTHER (Non-listed remedial process)	No
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
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.	
I hereby agree and sign off to the above statement	Name: Rachael Overbey Title: Project Manager Email: roverbey@fmlc.com Date: 03/01/2024
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 5  
  
Action 319423

QUESTIONS (continued)

Operator:  Franklin Mountain Energy 3, LLC 44 Cook Street Denver, CO 80206	OGRID:  331595
	Action Number:  319423
	Action Type:  [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

<b>Deferral Requests Only</b>	
Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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QUESTIONS, Page 6

Action 319423

**QUESTIONS (continued)**

Operator: Franklin Mountain Energy 3, LLC 44 Cook Street Denver, CO 80206	OGRID:
	331595
	Action Number:
	319423
Action Type:	
[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)	

**QUESTIONS**

Sampling Event Information	
Last sampling notification (C-141N) recorded	319235
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	03/05/2024
What was the (estimated) number of samples that were to be gathered	1
What was the sampling surface area in square feet	200

**Remediation Closure Request**

Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.

Requesting a remediation closure approval with this submission	No
--	----

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CONDITIONS

Action 319423

**CONDITIONS**

Operator: Franklin Mountain Energy 3, LLC 44 Cook Street Denver, CO 80206	OGRID:
	331595
	Action Number:
	319423
Action Type:	
[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)	

**CONDITIONS**

Created By	Condition	Condition Date
bhall	Remediation plan approved. The impacted areas will need to be horizontally and vertically delineated at time of excavation. Two-business day notification will need to be give through the OCD Permitting website prior to collecting confirmation/final sampling pursuant to 19.15.29.12 D.(1)(a) NMAC.	3/4/2024
bhall	The remediation closure report will need to include: and executive summary of the remediation activities; scaled site map (s) including sampling locations; Analytical results; pictures of the excavated areas.	3/4/2024
bhall	The reclamation report will need to include: Executive Summary of the reclamation activities; Scaled Site Map including sampling locations; Analytical results including, but not limited to, results showing that any remaining impacts meet the reclamation standards and results to prove the backfill is non-waste containing; At least one (1) representative 5-point composite sample will need to be collected from the backfill material that will be used for the reclamation of the top four feet of the excavation. OCD reserves the right to request additional sampling if needed; pictures of the backfilled areas showing that the area is back, as nearly as practical, to the original condition or the final land use and maintain those areas to control dust and minimize erosion to the extent practical; pictures of the top layer, which is either the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater; and a revegetation plan.	3/4/2024
bhall	A revegetation report will not be accepted until the release area, including areas reasonably needed for production or drilling activities, are complete. Areas not reasonably needed for production or drilling activities will still need to be reclaimed and revegetated as early as practicable. All revegetation activities will need to be documented and included in the revegetation report.	3/4/2024
bhall	The revegetation report will need to include: An executive summary of the revegetation activities including: Seed mix, Method of seeding, dates of when the release area was reseeded, information pertinent to inspections, information about any amendments added to the soil, information on how the vegetative cover established meets the life-form ratio of plus or minus fifty percent of pre-disturbance levels and a total percent plant cover of at least seventy percent of pre-disturbance levels, excluding noxious weeds per 19.15.29.13 D.(3) NMAC, and any additional information; a scaled Site Map including area that was revegetated in square feet; and pictures of the revegetated areas during reseeding activities, inspections, and final pictures when revegetation is achieved.	3/4/2024
bhall	OR Per 19.15.29.13 E. NMAC, if a reclamation and revegetation report has been submitted to the surface owner, it may be used if the requirements of the surface owner provide equal or better protection of freshwater, human health, and the environment. A copy of the approval of the reclamation and revegetation report from the surface owner and a copy of the approved reclamation and revegetation report will need to be submitted to the OCD via the Permitting website.	3/4/2024
bhall	A Remediation Closure and Reclamation report will need to be submitted via the OCD Permitting website by 6/4/2024. An approvable revegetation report will need to be submitted when the site complies with OCD revegetation requirements or the surface owner requirements, whichever is more stringent, prior to this incident number reaching the final status of "Restoration Complete".	3/4/2024