



February 28, 2024

Brittany Hall  
Projects Environmental Specialist  
Oil Conservation Division  
New Mexico Energy, Minerals and Natural Resources Department  
1220 South St. Francis Drive  
Santa Fe, NM 87505

**RE: Closure Report  
ConocoPhillips  
James A Com #001 Release  
Unit Letter O, Section 2, Township 22 South, Range 30 East  
Eddy County, New Mexico  
Incident ID# NAB1722132401**

Ms. Hall,

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (ConocoPhillips) to assess a historic release that occurred on the James A Com #001 well lease pad (API No. 30-015-10806). The release footprint is located in Public Land Survey System (PLSS) Unit Letter O, Section 2, Township 22 South, and Range 30 East, in Eddy County, New Mexico (Site). The approximate release point occurred at coordinates 32.415738°, -103.849866°, as shown on Figures 1 and 2.

## BACKGROUND

According to the State of New Mexico Oil Conservation Division (NMOCD) C-141 Initial Report, the release was discovered on August 3, 2017. The C-141 reports that the release was found originating from a tank overflow event. Approximately 10 barrels (bbls) of produced water were released and 0 bbls of produced water were recovered. The NMOCD approved the initial C-141 on August 8, 2017, and subsequently assigned the release the Incident ID NAB1722132401. The initial C-141 form is included in Appendix A.

This incident is included in an Agreed Compliance Order-Releases (ACO-R) between ConocoPhillips and the NMOCD signed on May 7 and 9, 2019, respectively.

## LAND OWNERSHIP

According to the NMOCD Oil and Gas Map, the Site is located on State Trust Lands. A review of the New Mexico State Land Office (NMSLO) Land Status Map was completed, and the Site is located within active oil and gas lease K032710001, which is listed under ConocoPhillips Company. Based on guidance provided by the NMSLO, as the release footprint is wholly located within the boundaries of a ConocoPhillips active oil and gas lease, no Remediation Right of Entry (ROE) is required at the Site.

## CULTURAL PROPERTIES PROTECTION

Tetra Tech, on behalf of ConocoPhillips, contracted SWCA Environmental Consultants (SWCA) to conduct an Archeological Resources Management Section (ARMS) review in the release area to comply with

**TETRA TECH**

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Tel 432.682.4559 Fax 432.682.3946 [www.tetrattech.com](http://www.tetrattech.com)

19.2.24 New Mexico Administrative Code (NMAC). On October 10, 2023, SWCA completed a literature and file search using the State of New Mexico's New Mexico Cultural Resources Information System online database which included a review of known historic resources, including the built environment, archaeological sites, and State/National Register listed properties.

In the review, SWCA found the area surrounding the site footprint (radius of 500 meters) has been subject to twenty-six (26) cultural resource surveys, nine (9) of which are qualifying. Three (3) previously recorded sites are located outside of the project area but within the 500-meter search buffer. The project area is entirely located on NMSLO-managed lands and is covered by one (1) qualifying survey conducted within the last ten years (NMCRIS Activity No. 127366) and is located on previously disturbed land from oil and gas construction activities.

A copy of the ARMS letter is included in Appendix B. All remediation work described in subsequent sections of this report remained within the previously qualifying survey area and approved existing disturbance.

## SITE CHARACTERIZATION

A site characterization was performed and no sinkholes, residences, schools, hospitals, institutions, churches, springs, private domestic water wells, playa lakes, stream bodies, wetlands, incorporated municipal boundaries, subsurface mines, or floodplains are located within the distances specified in 19.15.29 NMAC. The Site is in an area of high karst potential. The nearest mapped area of induced seismicity is located more than five (5) miles from the site.

There are no water wells listed in the New Mexico Office of the State Engineer (NMOSE) database located within approximately ½ mile (800 meters) of the Site. According to data from one (1) water well listed in the NMOSE database within approximately 3.2 miles (5,158 meters) of the Site, the minimum depth to groundwater is 1,054 feet below ground surface (bgs). The site characterization data is presented in Appendix C.

## REGULATORY FRAMEWORK

Based upon the release footprint and in accordance with Subsection E of 19.15.29.12 NMAC, per 19.15.29.11 NMAC, the site characterization data was used to determine recommended remedial action levels (RRALs) for benzene, toluene, ethylbenzene, and xylene (collectively referred to as BTEX), total petroleum hydrocarbons (TPH), and chlorides in soil.

Based on the site characterization conducted and in accordance with Table I of 19.15.29.12 NMAC, the RRALs for the Site are as follows:

Constituent	Site RRAL
Chloride	600 mg/kg
TPH (GRO+DRO+MRO)	100 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

## 2020 VISUAL SITE INSPECTION AND CLOSURE REQUEST

Tetra Tech, on behalf of ConocoPhillips, conducted a records review and a visual inspection of the release in 2020. ConocoPhillips representatives provided general information and an approximate release area footprint. On June 11, 2020, Tetra Tech personnel were onsite to evaluate the release area. No existing evidence of the release footprint on the pad or adjacent lease roads was observed. Based on anecdotal information, some remedial action had been performed at the Site. Evidence of earthwork reported by ConocoPhillips at the release area was observed during the inspection. The containment berm appeared recently constructed, and clean soil and gravel piles were observed near the tank on the pad.

Tetra Tech completed a Closure Letter Report dated October 15, 2020, and submitted the report to NMOCD as part of the ACO submittals via the online file sharing platform CentreStack. A copy of the Closure Letter Report is available in the NMOCD online incident files.

## NMOCD REJECTION

The Closure Letter Report was rejected by NMOCD on April 18, 2023, with the following comments:

- *"Closure for this incident is not approved.*
- *The OCD requires that this release be Remediated according to 19.15.29.12 NMAC and 19.15.29.13 NMAC as they apply to this release and resubmit a closure report by 07/17/2023."*

An extension request for this incident was submitted to the NMOCD on September 22, 2023. The extension was approved on September 25, 2023, for a due date of December 1, 2023. Regulatory correspondence is included in Appendix B.

## SITE ASSESSMENT AND REMEDIATION WORK PLAN

Tetra Tech personnel were onsite on October 9, 2023, to conduct assessment activities at the Site. Three (3) hand auger borings were installed within the apparent release extent to 3 feet bgs (AH-1) and 4 feet bgs (AH-2 and AH-3) to achieve vertical delineation. Four (4) hand auger borings (AH-4 through AH-7) were installed to 1 foot bgs around the perimeter to achieve horizontal delineation. Boring locations from the October 2023 sampling event are presented in Figure 3. Photographic documentation of the release area and assessment activities is presented in Appendix D.

A total of twelve (12) soil samples were collected from the seven (7) borings and sent to Cardinal Laboratories in Hobbs, New Mexico to be analyzed for chloride via Standard Method SM4500Cl-B, TPH via EPA Method 8015M, and BTEX via EPA Method 8261B. The laboratory analytical results from the October 2023 assessment are summarized in Table 1. Analytical results associated with the 0-1 foot and 2-3-foot sample intervals at AH-2 exceeded the Site RRALs for chloride (600 mg/kg). There were no other analytical results which exceeded the Site RRALs for any of the analyzed constituents.

Tetra Tech re-mobilized to the site on November 6, 2023, to field screen for salinity using an ExStik to determine a more accurate footprint of the release within the area of AH-2. From the field screening results and the October 2023 assessment sampling event, the approximate release extent is presented in Figure 3.

## WORK PLAN APPROVALS

A Release Characterization and Remediation Work Plan (Work Plan) dated November 27, 2023 was prepared based on the results of the 2023 release assessment activities and submitted to the NMOCD and NMSLO for approval. The Work Plan was approved by NMOCD in an email dated November 28, 2023, with the following comments:

- *"Remediation plan approved.*
- *Wall confirmation/final samples from the areas near the 4-foot buffer zone of any pressurized lines will need to be collected. Submit a complete report through the OCD Permitting website by 2/28/2024."*

The NMSLO Environmental Compliance Office (ECO) approved the remediation plan on December 18, 2023, via email and concurred with NMOCD conditions of approval. A copy of the regulatory correspondence is included as Appendix B.

## REMEDIATION ACTIVITIES AND CONFIRMATION SAMPLING

In January 2024, Tetra Tech personnel were onsite to remediate the release as proposed in the approved Work Plan, including excavation, disposal, and backfill. The extent of impacted soils was confirmed with field soil screening data and excavated to 3 feet bgs throughout the release extent. Areas in close proximity to pressurized lines or other production equipment were daylighted and hand-dug to depths of 1 to 3 feet bgs or the maximum extent practicable. The area of sample location AH-1 was excavated to a depth of 1-foot bgs, as additional subsurface and electrical lines were identified during excavation activities. Heavy equipment was not operated within 4 feet of any pressurized lines due to safety concerns, as this is an active oil and gas lease. Due to this, there were multiple non-aggressive excavation/buffer zones in the work area, and as directed by the OCD, confirmation/final sidewall samples were collected in the areas near the buffer zones of pressurized lines (BZ-1 through BZ-3). Photographs from the excavated areas prior to backfill are provided in Appendix D.

Prior to confirmation sampling, in accordance with Subsection D of 19.15.29.12 NMAC, the NMOCD was notified via the OCD portal on January 10, 2024. Documentation of associated regulatory correspondence is included in Appendix B. On January 18, 2024, Tetra Tech personnel were onsite for confirmation sampling. Confirmation floor and sidewall samples were collected for laboratory analysis to verify that the impacted materials were properly removed. Each confirmation sample laboratory analytical result was directly compared to the approved RRALs to demonstrate compliance.

All of the excavated material was transported offsite for proper disposal. Approximately one hundred and eighty (180) cubic yards of material were transported to the R360 Halfway Facility in Hobbs, New Mexico. Copies of the waste manifests are included in Appendix F.

Per the conditions of the NMOCD approval of the Work Plan, confirmation samples were collected such that each discrete sample (sidewall and floor) were representative of no more than 400 square feet of excavated area. A total of four (4) floor sample locations and six (6) sidewall sample locations were used during the remedial activities. Due to multiple non-aggressive excavation / buffer zones in the release area buffer zone samples were collected. Confirmation sidewall sample locations were labeled with "SW"-#, confirmation floor sample locations were labeled with "FS"-#, and confirmation buffer zone sample locations were labeled "BZ-#". Analytical results for all confirmation soil samples (floor, sidewall, and buffer zone) were below the respective RRALs for chloride, BTEX, and TPH. The results of the January 2024 confirmation sampling events are summarized in Table 2. Laboratory analytical data is included in Appendix E. Excavated areas, depths and confirmation sample locations are shown in Figure 4.

## RECLAMATION ACTIVITIES

In accordance with 19.15.29.13 NMAC, all areas disturbed by the remediation have been reclaimed. Collected confirmation samples were placed into laboratory-provided sample containers, transferred under chain-of-custody, and analyzed within appropriate holding times by Cardinal. The soil samples were analyzed for TPH (GRO+DRO+MRO) by EPA Method 8015M, BTEX by EPA Method 8021B, and chlorides by SM4500Cl-B. The analytical results were directly compared to the reclamation requirements and established Site RRALs to demonstrate compliance.

Once acceptable confirmation sample results were received, the excavation was backfilled with clean material to pre-release grade. All final confirmation soil samples (floor and sidewall) were below applicable cleanup levels for chloride, TPH, and BTEX. Excavated areas, depths and confirmation sample locations are indicated in Figure 4. In accordance with 19.15.29.12 NMAC, the reclaimed area contains a minimum non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by SM4500Cl-B. One (1) representative 5-point composite sample was collected from the backfill material used for the reclamation of the excavation. Soil backfill composite sampling results are summarized in Table 3.

Closure Report  
February 28, 2024

ConocoPhillips

Backfilled areas were restored to the original condition or the final land use. Portions of the reclaimed areas west of the tank berm were reseeded. The remainder of this release footprint was within an active pad, so those areas were not seeded. Copies of laboratory analysis and chain-of-custody documentation are included in Appendix E.

## CONCLUSION

ConocoPhillips respectfully requests closure of the release incident based on the confirmation sampling results and remediation activities performed. The final C-141 forms are enclosed in Appendix A. If you have any questions concerning the remediation activities for the Site, please call me at (512) 739-7874.

Sincerely,  
**Tetra Tech, Inc.**



Lisbeth Chavira  
Project Manager



Christian M. Llull, P.G.  
Program Manager

cc:  
Mr. Moises H. Cantu Garcia, PBU – ConocoPhillips

Closure Report  
February 28, 2024

ConocoPhillips

## LIST OF ATTACHMENTS

### Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Approximate Release Extent and Site Assessment (2023)
- Figure 4 – Remediation Extents and Confirmation Sampling (2024)

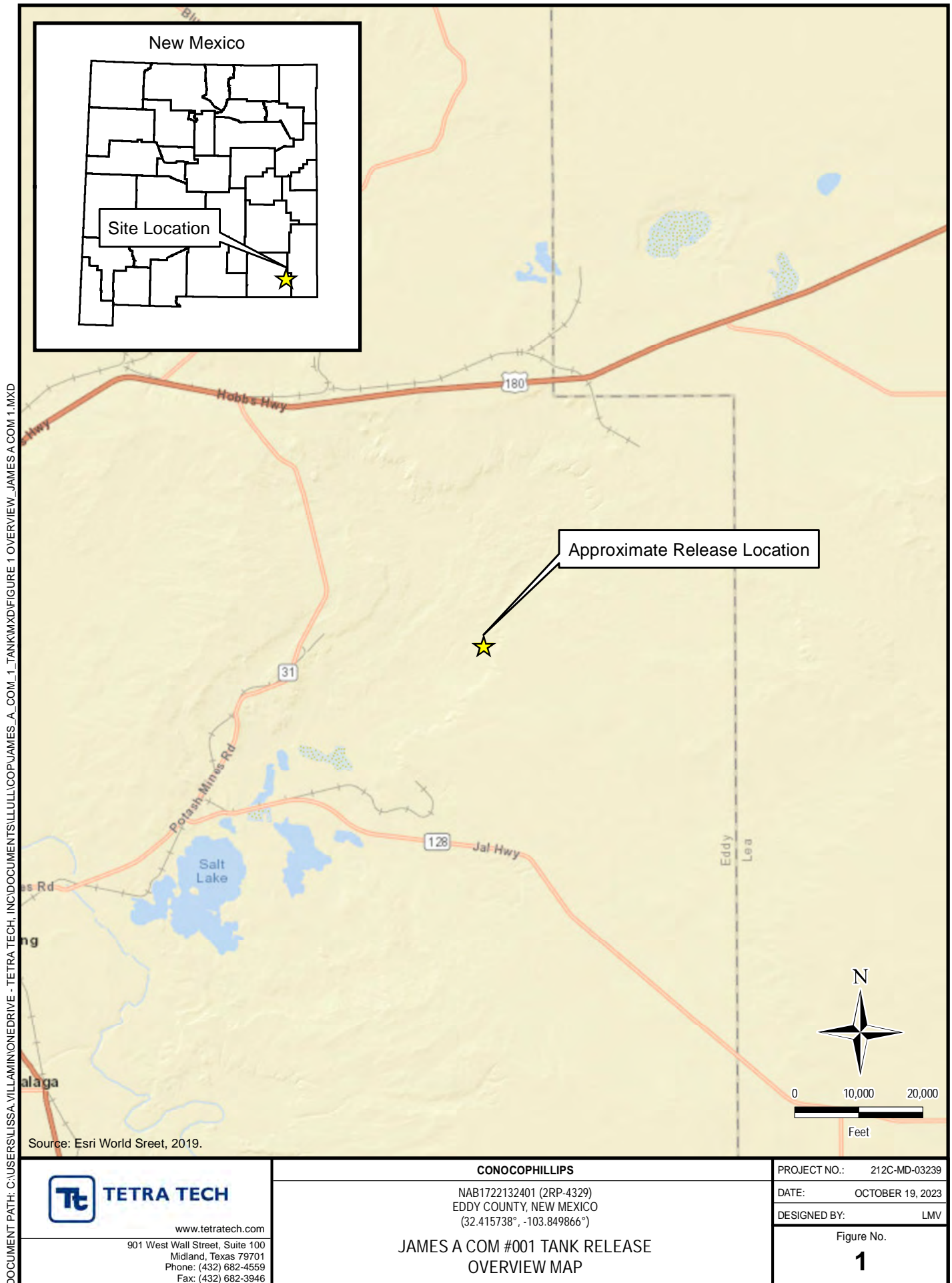
### Tables:

- Table 1 – Summary of Analytical Results – 2023 Soil Assessment
- Table 2 – Summary of Analytical Results – 2024 Soil Remediation
- Table 3 – Summary of Analytical Results – Backfill Composite

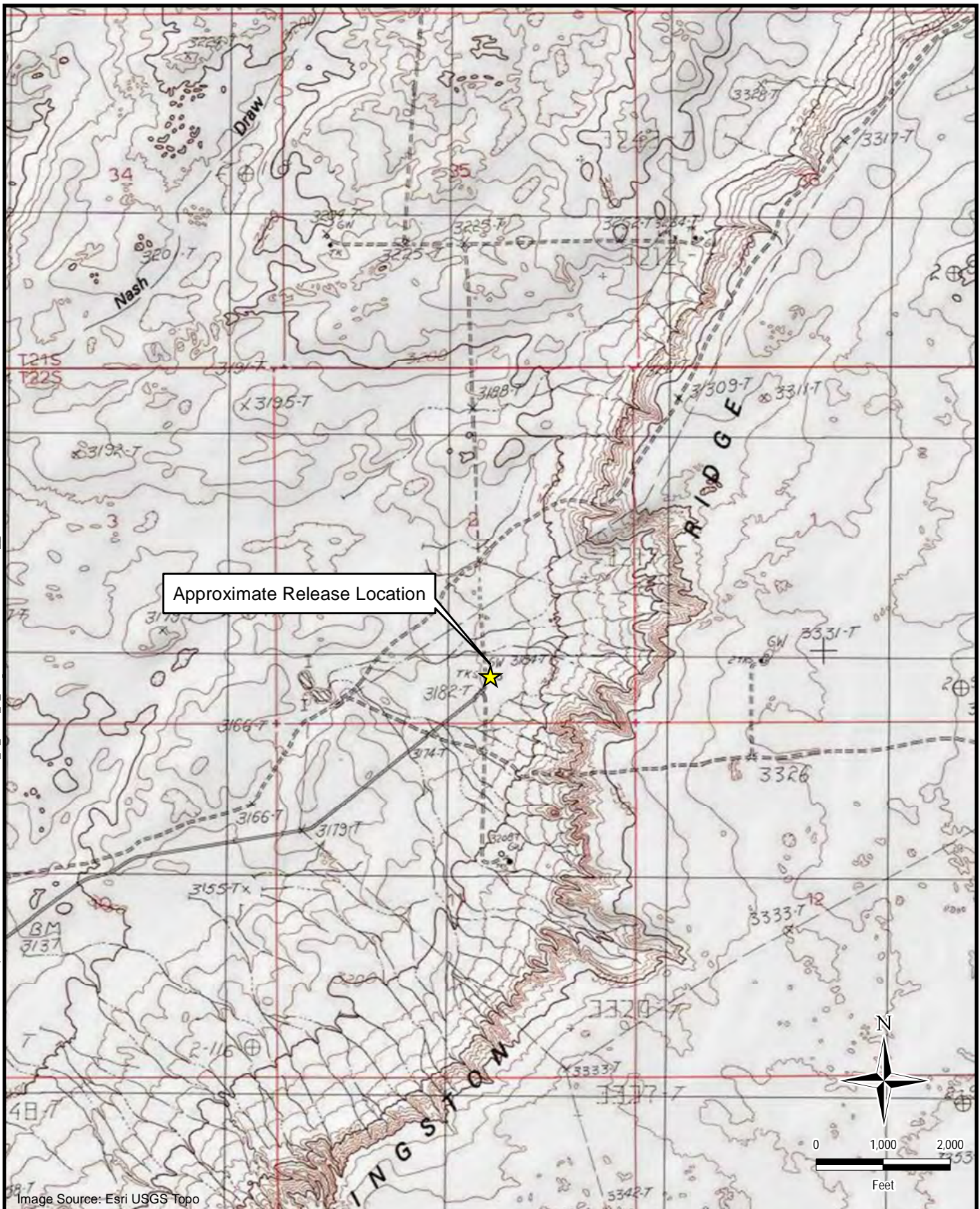
### Appendices:

- Appendix A – C-141 Forms
- Appendix B – Regulatory Correspondence
- Appendix C – Site Characterization Data
- Appendix D – Photographic Documentation
- Appendix E – Laboratory Analytical Reports
- Appendix F – Waste Manifests

## **FIGURES**



DOCUMENT PATH: C:\USERS\LISSA.VILLAMONEDRIVE - TETRA TECH\INC\DOCUMENTS\ILLUSTRATIONS\JAMES\_A\_COM\_1\_TANKMX\FIGURE 2 TOPO - JAMES A COM 1.MXD



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#### CONOCOPHILLIPS

NAB1722132401 (2RP-4329)  
EDDY COUNTY, NEW MEXICO  
(32.415738°, -103.849866°)

#### JAMES A COM #001 TANK RELEASE TOPOGRAPHIC MAP

PROJECT NO.: 212C-MD-03239

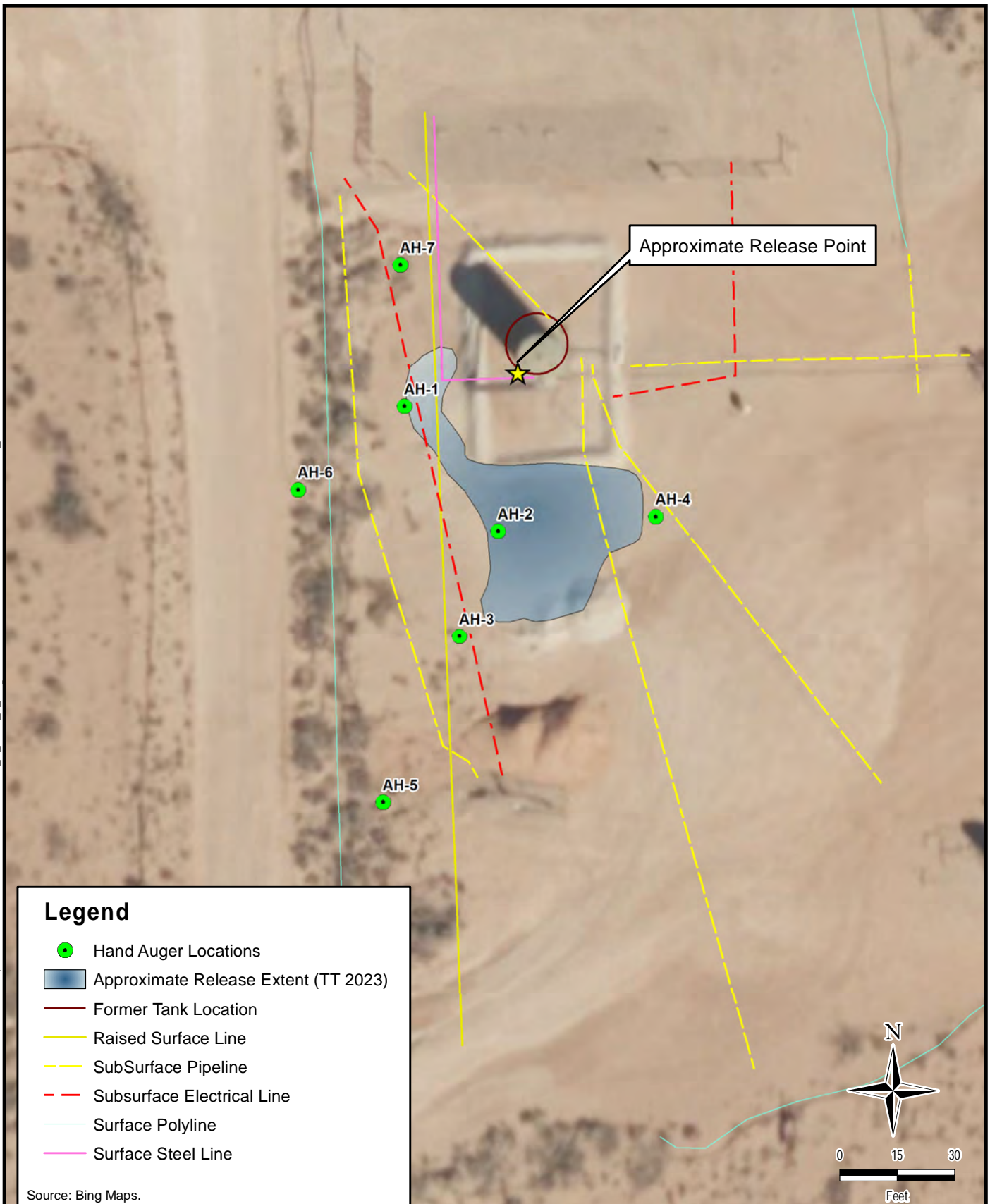
DATE: OCTOBER 19, 2023

DESIGNED BY: LMV

Figure No.

**2**

DOCUMENT PATH: C:\USERS\LISSA.VILLAMINIONEDRIVE - TETRA TECH\INC\DOCUMENTS\LISSA.VILLAMINIONEDRIVE - TETRA TECH\JAMES A COM #001\_TANKMXD\FIGURE 4 RELEASE & ASSESS 2023\_JAMES A COM 1.MXD



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**CONOCOPHILLIPS**

NAB1722132401 (2RP-4329)  
EDDY COUNTY, NEW MEXICO  
(32.415738°, -103.849866°)

**JAMES A COM #001 TANK RELEASE  
APPROXIMATE RELEASE EXTENT AND SITE ASSESSMENT (2023)**

PROJECT NO.: 212C-MD-03239

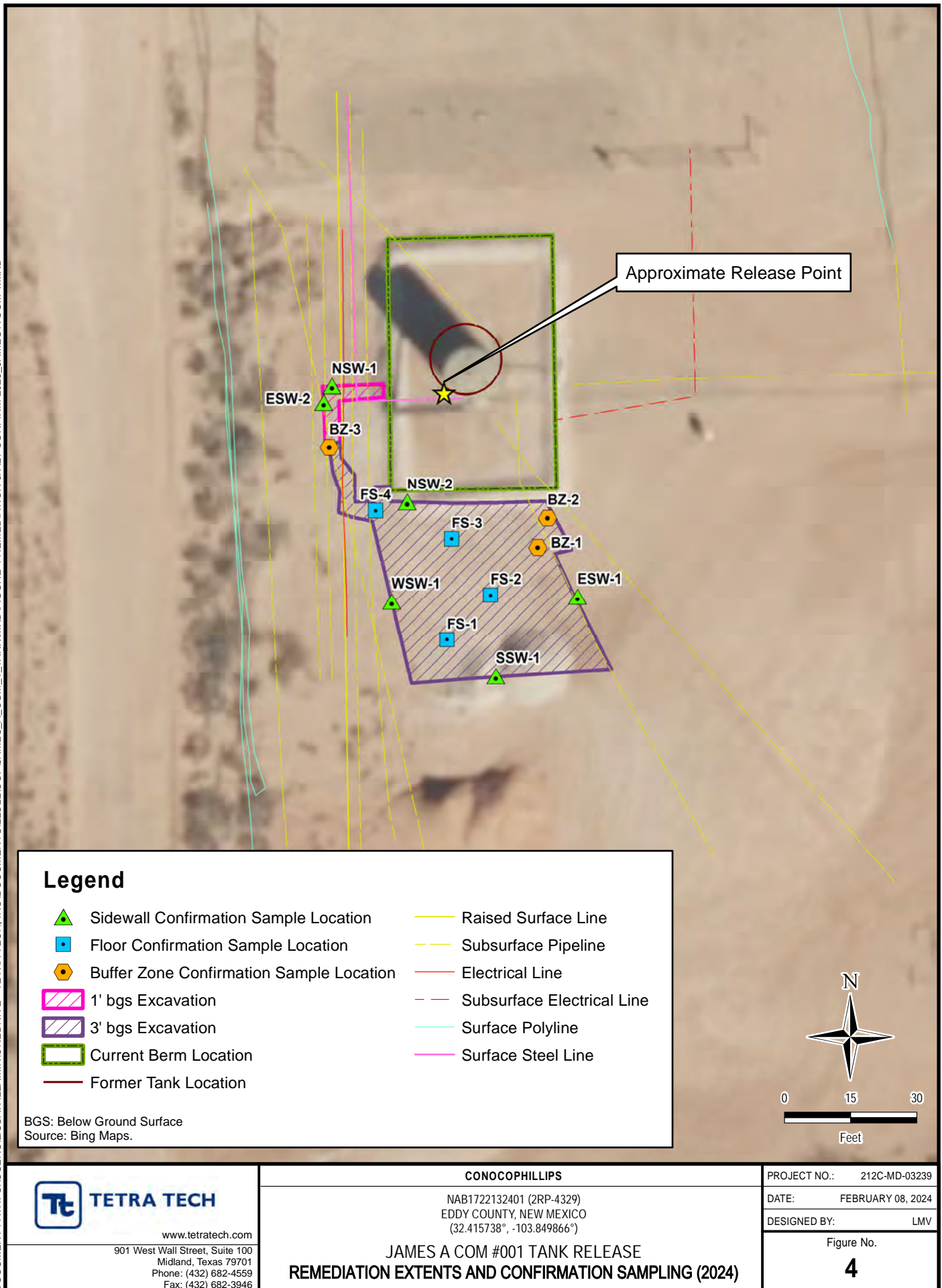
DATE: NOVEMBER 10, 2023

DESIGNED BY: LMV

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**3**

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## **TABLES**

TABLE 1  
SUMMARY OF ANALYTICAL RESULTS  
2023 SOIL ASSESSMENT- nAB1722132401  
CONOCOPHILLIPS  
JAMES A COM #001 TANK  
EDDY COUNTY, NM

Sample ID	Sample Date	Sample Depth	Chloride		BTEX <sup>2</sup>										TPH <sup>3</sup>							
					Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		EXT DRO		Total TPH (GRO+DRO+EXT DRO)	
															C <sub>6</sub> - C <sub>10</sub>		> C <sub>10</sub> - C <sub>28</sub>		> C <sub>28</sub> - C <sub>36</sub>			
		ft. bgs	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q		
AH-1	10/9/2023	0-1	32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
		2-3	32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
AH-2	10/9/2023	0-1	656		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
		2-3	1,420		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		27.1		<10.0			
		3-4	48.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
AH-3	10/9/2023	0-1	80.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
		2-3	32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
		3-4	592		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
AH-4	10/9/2023	0-1	80.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
AH-5	10/9/2023	0-1	16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
AH-6	10/9/2023	0-1	16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
AH-7	10/9/2023	0-1	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			

## NOTES:

ft. Feet

bgs Below ground surface

mg/kg Milligrams per kilogram

TPH Total Petroleum Hydrocarbons

GRO Gasoline range organics

DRO Diesel range organics

1 Method SM4500Cl-B

2 Method 8021B

3 Method 8015M

**Bold and italicized values indicate exceedance of proposed RRALs and Reclamation Requirements.**

Shaded rows indicate intervals proposed for excavation.

TABLE 2  
SUMMARY OF ANALYTICAL RESULTS  
SOIL REMEDIATION - nAB1722132401  
CONOCOPHILLIPS  
JAMES A COM #001 TANK RELEASE  
EDDY COUNTY, NM

Sample ID	Sample Date	Field Screening Results		Chloride <sup>1</sup>		BTEX <sup>2</sup>										TPH <sup>3</sup>							
						Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		EXT DRO		Total TPH (GRO+DRO+EXT DRO)	
		C <sub>6</sub> - C <sub>10</sub>														> C <sub>10</sub> - C <sub>28</sub>		> C <sub>28</sub> - C <sub>36</sub>					
		Chloride	PID	ppm		mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	
NSW-1	1/18/2024	421	-	240		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
NSW-2	1/18/2024	389	-	144		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
ESW-1	1/18/2024	507	-	256		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
WSW-1	1/18/2024	492	-	288		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
WSW-2	1/18/2024	343	-	192		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
SSW-1	1/18/2024	378	-	160		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
FS-1	1/18/2024	611	-	528		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
FS-2	1/18/2024	662	-	512		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
FS-3	1/18/2024	535	-	336		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
FS-4	1/18/2024	603	-	272	QM-07	<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
BZ-1	1/18/2024	648	-	448		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
BZ-2	1/18/2024	566	-	304		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			
BZ-3	1/18/2024	369	-	48		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			

NOTES:

ft. Feet

bgs Below ground surface

mg/kg Milligrams per kilogram

TPH Total Petroleum Hydrocarbons

GRO Gasoline range organics

DRO Diesel range organics

1 Method SM4500Cl-B

2 Method 8021B

3 Method 8015M

***Bold and italicized values indicate exceedance of proposed Remediation RRALs and Reclamation Requirements.***

QUALIFIERS:

QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.

TABLE 3  
SUMMARY OF ANALYTICAL RESULTS  
SUTTON PIT - SOIL BACKFILL - NAB1722132401  
CONOCOPHILLIPS  
JAMES A COM #001 TANK RELEASE  
EDDY COUNTY, NM

Sample ID	Sample Date	Chloride <sup>1</sup>		BTEX <sup>2</sup>										TPH <sup>3</sup>						
				Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		EXT DRO		Total TPH (GRO+DRO+EXT DRO)
		C <sub>6</sub> - C <sub>10</sub>												> C <sub>10</sub> - C <sub>28</sub>		> C <sub>28</sub> - C <sub>36</sub>				
		mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	
BACKFILL - COMPOSITE	2/15/2024	112		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-

## NOTES:

- ft. Feet  
bgs Below ground surface  
mg/kg Milligrams per kilogram  
TPH Total Petroleum Hydrocarbons  
GRO Gasoline range organics  
DRO Diesel range organics  
1 Method SM4500Cl-B  
2 Method 8021B  
3 Method 8015M

## **APPENDIX A C-141 Forms**

**District I**  
1625 N. French Dr., Hobbs, NM 88240  
**District II**  
811 S. First St., Artesia, NM 88210  
**District III**  
1000 Rio Brazos Road, Aztec, NM 87410  
**District IV**  
1220 S. St. Francis Dr., Santa Fe, NM 87505

**NM OIL CONSERVATION**  
ARTESIA DISTRICT  
State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

**NM OIL CONSERVATION**  
ARTESIA DISTRICT  
Form C-141  
Revised August 8, 2011  
Copy to appropriate District Office in accordance with 19.15.29 NMAC.

**RECEIVED**  
AUG 08 2017

**RECEIVED**  
AUG 08 2017

## Release Notification and Corrective Action

NAB1722132401

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: <b>ConocoPhillips</b>	Contact: <b>Jose A Zepeda</b>
Address: <b>1410 N West County Rd</b>	Telephone No. <b>575-391-3165</b>
Facility Name: <b>James A Com #001</b>	Facility Type: <b>Tank Ran Over</b>

Surface Owner: <b>Federal</b>	Mineral Owner: <b>State</b>	API No. <b>30-015-10806</b>
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## LOCATION OF RELEASE

Unit Letter <b>O</b>	Section <b>02</b>	Township <b>22S</b>	Range <b>30E</b>	Feet from the <b>665</b>	North/South Line <b>665</b>	Feet from the <b>2006</b>	East/West Line <b>2006</b>	County <b>EDDY</b>
-------------------------	----------------------	------------------------	---------------------	-----------------------------	--------------------------------	------------------------------	-------------------------------	-----------------------

Latitude 32.4157257 Longitude -103.8494339

## NATURE OF RELEASE

Type of Release: <b>Produce Water</b>	Volume of Release: <b>10</b>	Volume Recovered: <b>0</b>
Source of Release: <b>Tank Ran Over</b>	Date and Hour of Occurrence <b>08/03/2017 0800</b>	Date and Hour of Discovery <b>SAME</b>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <b>Olivia Yu, &amp; Shelly Tucker</b>	
By Whom? <b>Jose A Zepeda</b>	Date and Hour: <b>08/03/2017 1000 Via Email</b>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully. \*

N/A

Describe Cause of Problem and Remedial Action Taken. \*

On August 3, 2017 at 0800 hrs. at James A Com #001, a release was found originating from a tank overflow event. Incident resulted in a release of 10 bbl. of produced water with 0 bbl. recovered. Immediate action was to isolate the inlet to the tank stopping the release. Spill site will be remediated per COPC and NMOCD guidelines.

Describe Area Affected and Cleanup Action Taken. \*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.

Signature: <b>JOSE A ZEPEDA</b>		<b>OIL CONSERVATION DIVISION</b>	
Printed Name: <b>Jose A Zepeda</b>		Approved by Environmental Specialist 	
Title: <b>LEAD HSE</b>		Approval Date: <b>8/8/17</b>	Expiration Date: <b>N/A</b>
E-mail Address: <b>Jose. A. Zepeda@conocophillips.com</b>		Conditions of Approval: <b>see attached</b>	
Date: <b>08/03/2017</b>		Attached <input checked="" type="checkbox"/>	
Phone: <b>575-391-3165</b>			

\* Attach Additional Sheets If Necessary

2RP-4329

## Operator/Responsible Party,

The OCD has received the form C-141 you provided on 8/8/17 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number ARP-4329 has been assigned. **Please refer to this case number in all future correspondence.**

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

*The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]*

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. **As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District II office in Artesia on or before 9/8/17. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.**

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.
- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.
- Nominal detection limits for field and laboratory analyses must be provided.
- Composite sampling is not generally allowed.
- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

**Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.**

**Jim Griswold**  
OCD Environmental Bureau Chief  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
505-476-3465  
jim.griswold@state.nm.us

**Weaver, Crystal, EMNRD**

---

**From:** Yu, Olivia, EMNRD  
**Sent:** Tuesday, August 8, 2017 10:18 AM  
**To:** Zepeda, Jose A; Wright, Justin K  
**Cc:** Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD; Tucker, Shelly  
**Subject:** FW: C-141 080317.doc  
**Attachments:** C-141 080317.doc

Mr. Zepeda:

This release occurred in District II. Mike Bratcher and Crystal Weaver are cc'd.

Olivia

**From:** Zepeda, Jose A [mailto:Jose.A.Zepeda@conocophillips.com]  
**Sent:** Thursday, August 3, 2017 10:02 AM  
**To:** Tucker, Shelly <stucker@blm.gov>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>  
**Cc:** Wright, Justin K <Justin.Wright@conocophillips.com>  
**Subject:** C-141 080317.doc

Incident ID	nAB1722132401
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?	>50 (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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

<b>Characterization Report Checklist:</b> Each of the following items must be included in the report.
<input checked="" type="checkbox"/> Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
<input checked="" type="checkbox"/> Field data
<input checked="" type="checkbox"/> Data table of soil contaminant concentration data
<input checked="" type="checkbox"/> Depth to water determination
<input checked="" type="checkbox"/> Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
<input type="checkbox"/> Boring or excavation logs
<input checked="" type="checkbox"/> Photographs including date and GIS information
<input checked="" type="checkbox"/> Topographic/Aerial maps
<input checked="" type="checkbox"/> 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.

Incident ID	nAB1722132401
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: Moises H. Cantu Garcia Title: Sr. Environmental Engineer

Signature: Moises H Cantu Garcia Date: 11/22/2023

email: Moises.H.CantuGarcia@conocophillips.com Telephone: 432-688-6090

**OCD Only**

Received by: Shelly Wells Date: 11/27/2023

Incident ID	nAB1722132401
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: Moises H. Cantu Garcia Title: Sr. Environmental Engineer  
Signature: Moises H Cantu Garcia Date: 11/22/2023  
email: Moises.H.CantuGarcia@conocophillips.com Telephone: 432-688-6090

**OCD Only**

Received by: Shelly Wells Date: 11/27/2023

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

Signature: Brittany Hall Date: 11/28/2023

Incident ID	
District RP	
Facility ID	
Application ID	

## Closure

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

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

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

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

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

Signature: Moises H Cantu Garcia Date: \_\_\_\_\_

email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**

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

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

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

## **APPENDIX B**

# **Regulatory Correspondence**



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7770 Jefferson Street NE, Suite 410  
Albuquerque, New Mexico 87109  
Tel 505.254.1115 Fax 505.254.1116  
www.swca.com

October 12, 2023

**TO:** Ethan Ortega, Division Director & Archaeologist, New Mexico State Land Office, Santa Fe, New Mexico

**FROM:** SWCA Environmental Consultants

**SUBJECT:** Completion of an Archaeological Records Management Section (ARMS) Review for the James A Com #001 Tank Release (2RP-4329) Remediation Project on New Mexico State Land Office (NMSLO) lands in Lea County, NM

**Company Ref No:** None-Provided

**PROJECT DESCRIPTION:**

Tetra Tech, Inc. has requested that SWCA Environmental Consultants (SWCA) conduct an Archaeological Resources Management Section (ARMS) review for an inadvertent release in Lea County, New Mexico. The proposed project is on lands managed by the New Mexico State Land Office (NMSLO) approximately 34.5 kilometers (22.0 miles) east of Carlsbad, NM in T22S R30E, Section 2.

A literature and file search were conducted on October 10, 2023, using the New Mexico Cultural Resources Information System (NMCRIS) online database which included a review of known cultural resources, such as the built environment, archaeological sites, and State/National Register listed properties. Other sources reviewed include the BLM GLO Records web site, <http://www.glorerecords.blm.gov>, which include land patent and general land office survey data. As this area was not settled by Spain, land grant records were not reviewed. The review was conducted for the Area of Potential Effect (APE), consisting of the inadvertent release area and a 50-foot buffer, and 500 meters (m) (0.31 mile) surrounding the APE. The land the proposed project is located on is part of the March 2, 1899: Exchange-Natl Forest (lieu) (30 Stat. 993) patented on October 22, 1903, and the June 21, 1934: State Grant-School Sec Patent (48 Stat. 1185) patented on January 22, 1960.

**Recommendation:**

The project area and surrounding 500 m (0.31 mile) have been subject to twenty-six (26) cultural resource surveys, nine (9) of which are qualifying. Three (3) previously recorded sites are located outside of the project area but within the 500-m search buffer. The project area is entirely located on NMSLO-managed lands and is covered by one (1) qualifying survey conducted within the last ten years (NMCRIS Activity No. 127366) and is located on previously disturbed land from oil and gas construction activities. SWCA recommends the completion of an ARMS letter to satisfy the requirements of release remediation. All remediation work will remain within the previously qualifying survey area and the approved existing disturbance. If cultural materials are identified during ground disturbing activities, work must stop and the NMSLO must be contacted.

Information regarding the findings can be found in Tables 1-2 and Figure 1.

A handwritten signature in dark ink, appearing to read "Paisley DeFreese".

Archaeologist  
Paisley DeFreese  
Attached: (1) Review Results, (1) ARMS Map



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## Archaeological Resources Management Section (ARMS) Review Results

**Table 1. Cultural surveys within 500 meters (0.32 mile) of proposed project.**

NMCRIS No.	Performing Organization	Date of Investigation	Acres Surveyed	Sites Visited
13338	Archaeological Survey Consultants	6/19/1986	3.7	0
18413	New Mexico Archaeological Services, Inc	4/16/1987	6.57	1
18683	New Mexico Archaeological Services, Inc	5/25/1987	14.81	0
19181	New Mexico Archaeological Services, Inc	6/14/1987	4.44	0
24251	Pecos Archaeological Consultants	10/13/1988	51.92	3
24252	Pecos Archaeological Consultants	10/13/1988	43.24	2
27457	New Mexico Archaeological Services, Inc	10/25/1989	4.44	0
35634	New Mexico Archaeological Services, Inc	1/23/1991	8.16	0
39072	New Mexico Archaeological Services, Inc	10/22/1991	62.99	2
40445	New Mexico Archaeological Services, Inc	5/25/1992	54.77	0
40494	Pecos Archaeological Consultants	7/14/1992	37.21	0
43723	Pecos Archaeological Consultants	7/16/1993	56.79	0
46818	Pecos Archaeological Consultants	3/12/1993	1027.26	18
49036	TRC, Inc.	4/26/1995	285.9	5
55762	Pecos Archaeological Consultants	2/14/1997	26.39	0
117091	Boone Archaeological Services, LLC	4/8/2010	10.31	2
117934	Boone Archaeological Services, LLC	6/18/2010	4.54	0
127366	Boone Arch Svcs of NM	4/18/2013	50.3	5
129858	Boone Arch Svcs of NM	2/4/2014	151.3	1
130622	Boone Arch Svcs of NM	5/14/2014	18.41	0



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NMCRIS No.	Performing Organization	Date of Investigation	Acres Surveyed	Sites Visited
137350	Lone Mountain Archaeological Services	12/27/2016	39453.25	324
137620	SWCA Environmental Consultants	1/17/2017	458.77	6
147134	Lone Mountain Archaeological Services	12/2/2020	275.21	3
149590	Lone Mountain Archaeological Services	1/29/2022	10.79	0
150077	Black River Consulting, LLC	4/26/2022	4.17	0
152808	Goshawk Environmental Consulting	4/17/2023	7.08	0

**Table 2. Cultural resources within 500 meters (0.31 mile) of the proposed project area.**

\*Redacted

\*Redacted

**Figure 1. NMCRIS screenshot showing location of the proposed James A Com #001 Tank Release (2RP-4329) Remediation Project area (blue polygon) with 500 m (0.31 mile) buffer area (blue circle). Previously conducted investigations are brown and yellow polygons, and previously recorded sites are orange polygons.**

**Chavira, Lisbeth**

---

**From:** Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>  
**Sent:** Monday, September 25, 2023 8:35 AM  
**To:** Abbott, Sam; Enviro, OCD, EMNRD  
**Cc:** Llull, Christian; Chavira, Lisbeth; Maxwell, Ashley, EMNRD; Llull, Christian; Chavira, Lisbeth; Smith, Cory, EMNRD; Bratcher, Michael, EMNRD  
**Subject:** RE: [EXTERNAL] Extension Request - Application ID 207656 (nAB1722132401)

**⚠ CAUTION:** This email originated from an external sender. Verify the source before opening links or attachments. **⚠**

Sam,  
The extension request for nAB1722132401 is approved. The new due date is December 1, 2023.

If an approved workplan is found, it will need to have an email, stamps, etc. from the OCD that shows it was received and approved by the OCD prior to the rule change and will need to be submitted to the OCD ASAP. If the approved workplans are already uploaded into the files available on the OCD Permitting website the workplan will not need to be resubmitted.

Please let me know if you have any questions or require any additional information. Include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

Thank you,  
**Brittany Hall** • Environmental Specialist  
Environmental Bureau Projects Group  
EMNRD - Oil Conservation Division  
1000 Rio Brazos Road | Aztec, NM 87110  
505.517.5333 | [Brittany.Hall@emnrd.nm.gov](mailto:Brittany.Hall@emnrd.nm.gov)  
<http://www.emnrd.nm.gov/ocd/>

---

**From:** Abbott, Sam <Sam.Abbott@tetrattech.com>  
**Sent:** Friday, September 22, 2023 3:27 PM  
**To:** Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>; Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>  
**Cc:** Llull, Christian <Christian.Llull@tetrattech.com>; Chavira, Lisbeth <LISBETH.CHAVIRA@tetrattech.com>; Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>; Llull, Christian <Christian.Llull@tetrattech.com>; Chavira, Lisbeth <LISBETH.CHAVIRA@tetrattech.com>; Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>  
**Subject:** [EXTERNAL] Extension Request - Application ID 207656 (nAB1722132401)

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

Ms. Hall,

On behalf of ConocoPhillips, Tetra Tech is requesting an extension to December 1, 2023 to complete any necessary additional assessment activities and associated reporting for the James A Com #001 Release site (**nAB1722132401**).

A Closure Letter Report dated October 15, 2020 was rejected by the OCD on 4/18/2023 with the following comments: "Closure for this incident is not approved. The OCD requires that this release be Remediated according to 19.15.29.12 NMAC and 19.15.29.13 NMAC as they apply to this release and resubmit a closure report by 07/17/2023.

The OCD, ConocoPhillips, and Tetra Tech had a meeting on September 20, 2023 to discuss the OCD rejections of a select number of submitted closure reports associated with the Agreed Compliance Order (ACO) for open release incidents between ConocoPhillips and OCD. In this meeting, ConocoPhillips and Tetra Tech received clarification from the OCD on the closure requirements for the historical releases. Based on this meeting, ConocoPhillips will assess each remaining open release incident associated with the ACO to determine if there is an approved remediation work plan associated with the incident. If so, ConocoPhillips will proceed to perform the approved scope of work contained in the work plan. If there is not an approved work plan associated with the release incident, then ConocoPhillips will proceed with any necessary assessment and/or remediation activities in compliance with 19.15.29 NMAC.

ConocoPhillips is committed to addressing this open release incident in compliance with OCD regulations. Additional time is required to review incident records, perform additional assessment sampling if necessary, and prepare a revised report for OCD review. A complete report will be submitted to the OCD within the requested timeframe.

Thank you,  
Sam

**Samantha Abbott, PG** | Project Manager

Direct Mobile +1 (512) 739-7874 | Business +1 (512) 338-1667 | [Sam.Abbott@tetrattech.com](mailto:Sam.Abbott@tetrattech.com)

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8911 N Capital of Texas Hwy #2310 | Austin, TX 78759 | [tetrattech.com](http://tetrattech.com)

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**TETRA TECH**

**From:** [OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us)  
**To:** [Lull, Christian](#)  
**Subject:** The Oil Conservation Division (OCD) has approved the application, Application ID: 288468  
**Date:** Tuesday, November 28, 2023 9:41:49 AM

**CAUTION:** This email originated from an external sender. Verify the source before opening links or attachments.

To whom it may concern (c/o Christian Lull for CONOCOPHILLIPS COMPANY),

The OCD has approved the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAB1722132401, with the following conditions:

- **Remediation plan approved. Wall confirmation/final samples from the areas near the 4 foot buffer zone of any pressurized lines will need to be collected.**
- **Submit a complete report through the OCD Permitting website by 2/28/2024.**

The signed C-141 can be found in the OCD Online: Imaging under the incident ID (n#).

If you have any questions regarding this application, please contact me.

Thank you,  
Brittany Hall  
Projects Environmental Specialist - A  
505-517-5333  
[Brittany.Hall@emnrd.nm.gov](mailto:Brittany.Hall@emnrd.nm.gov)

**New Mexico Energy, Minerals and Natural Resources Department**  
1220 South St. Francis Drive  
Santa Fe, NM 87505

**From:** [Knight, Tami C.](#)  
**To:** [Chavira, Lisbeth](#); [Abbott, Sam](#); [Lull, Christian](#)  
**Cc:** [Barnes, Will](#); [Griffin, Becky R.](#); [David, Deon W.](#)  
**Subject:** NAB1722132401\_James A Com 001 WP\_Final - Approved  
**Date:** Monday, December 18, 2023 9:37:33 AM  
**Attachments:** [image001.jpg](#)  
[image002.jpg](#)  
[image003.jpg](#)  
[image004.jpg](#)

You don't often get email from tknight@slo.state.nm.us. [Learn why this is important](#)

**CAUTION:** This email originated from an external sender. Verify the source before opening links or attachments.

Documentation of proposed remediation actions for the subject release incident was received from your office on November 30, 2023. The NMSLO Environmental Compliance Office (ECO) has reviewed the plan, and based on the information provided in the document received from your office, ECO has approved the remediation plan and agrees with NMOCD conditions of approval. Please submit the remediation closure report to [eco@slo.state.nm.us](mailto:eco@slo.state.nm.us).

**Note: NMSLO is closed December 25 – January 1. Workplans and Reports will not be processed during this time. Happy Holidays!**

**Tami Knight, CHMM**

*Environmental Specialist*

*SRD-Environmental*

*Compliance Office (ECO)*

505.670.1638

New Mexico State Land Office

1300 W. Broadway Avenue, Suite A

Bloomfield, NM 87413

[tknight@slo.state.nm.us](mailto:tknight@slo.state.nm.us)

[nmstatelands.org](http://nmstatelands.org)

**PLEASE SUBMIT WORKPLANS AND REPORTS TO ECO@SLO.STATE.NM.US**

.....

**CONFIDENTIALITY NOTICE** - This e-mail transmission, including all documents, files, or previous e-mail messages attached hereto, may contain confidential and/or legally privileged information. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that you must not read this transmission and that any disclosure, copying, printing, distribution, or use of any of the information contained in and/or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please immediately notify the sender and delete the original transmission and its attachments without reading or saving in any manner. Thank you.

**From:** [OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us)  
**To:** [Llull, Christian](#)  
**Subject:** The Oil Conservation Division (OCD) has accepted the application, Application ID: 302275  
**Date:** Wednesday, January 10, 2024 3:55:15 PM

**CAUTION:** This email originated from an external sender. Verify the source before opening links or attachments.

To whom it may concern (c/o Christian Llull for CONOCOPHILLIPS COMPANY),

The OCD has received the submitted *Notification for (Final) Sampling of a Release* (C-141N), for incident ID (n#) nAB1722132401.

The sampling event is expected to take place:

**When:** 01/16/2024 @ 10:00

**Where:** O-02-22S-30E 665 FSL 2006 FEL (32.4157257,-103.8494339)

**Additional Information:** Navigation: 32.415738°, -103.849866°

**Additional Instructions:** Navigation: 32.415738°, -103.849866°

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, sampling pursuant to 19.15.29.12.D NMAC is required. Sampling must be performed following an approved sampling plan or pursuant to 19.15.29.12.D.(1).(c) NMAC. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

- **Failure to notify the OCD of sampling events including any changes in date/time per the requirements of 19.15.29.12.D.(1).(a) NMAC, may result in the remediation closure samples not being accepted.**

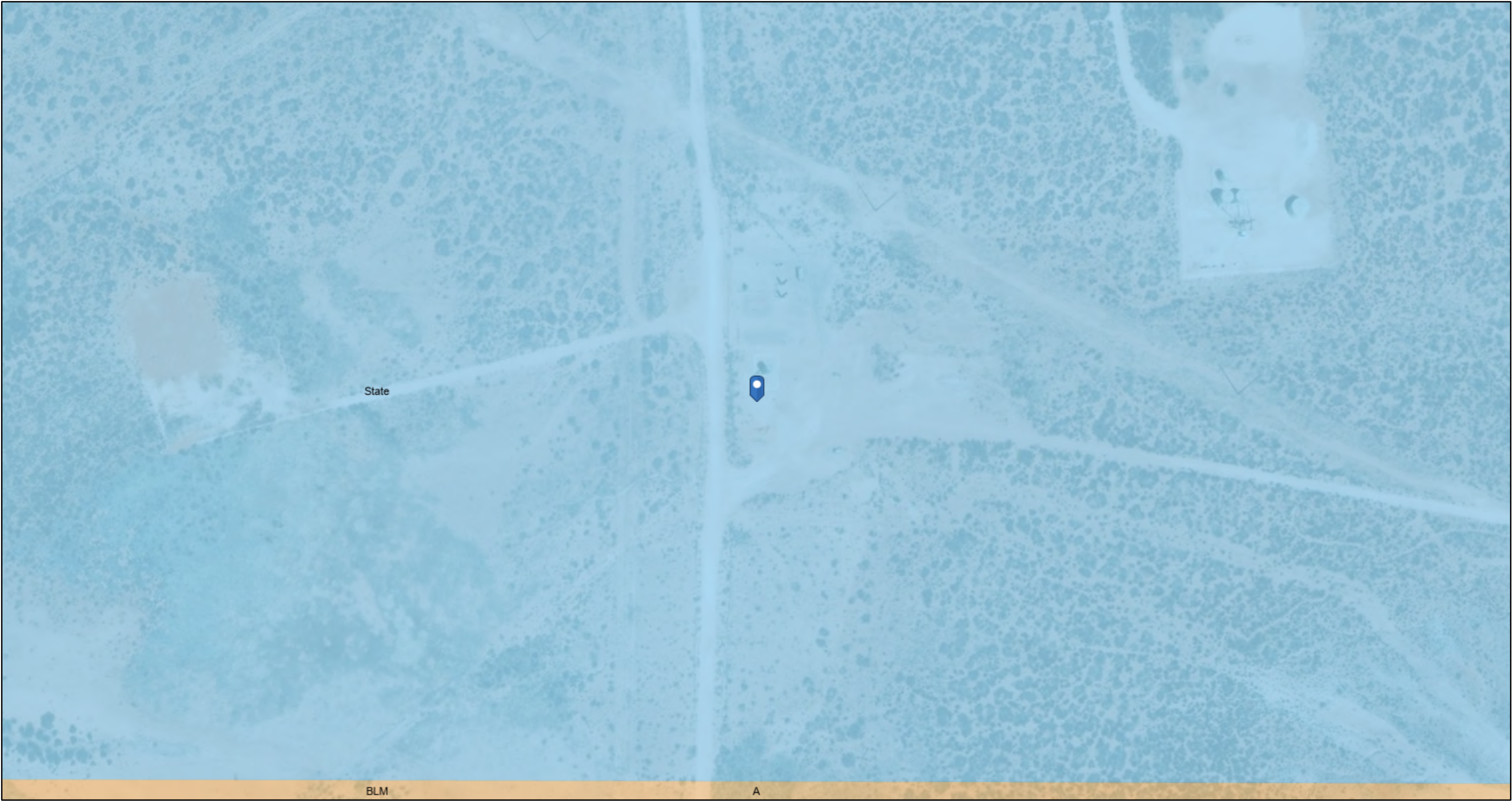
If you have any questions regarding this application, or don't know why you have received this email, please contact us.

**New Mexico Energy, Minerals and Natural Resources Department**  
1220 South St. Francis Drive  
Santa Fe, NM 87505

## **APPENDIX C**

### **Site Characterization Data**

# OCD - Mineral & Surface Ownership



10/5/2023, 1:51:32 PM

Mineral Ownership

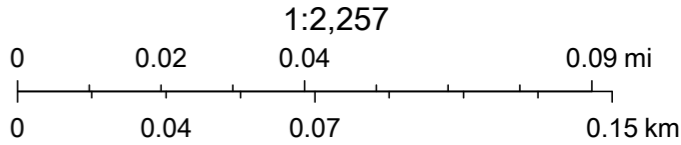
A-All minerals are owned by U.S.

N-No minerals are owned by the U.S.

Land Ownership

BLM

S



U.S. BLM, Maxar, Microsoft, Esri, HERE, Garmin, iPC

# National Flood Hazard Layer FIRMette



103°51'18"W 32°25'12"N



0 250 500 1,500 2,000 Feet

1:6,000

103°50'41"W 32°24'41"N

Released to Imaging: 3/8/2024 10:07:50 AM

Basemap Imagery Source: USGS National Map 2023

## Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5 Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
		Profile Baseline
		Hydrographic Feature
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped



The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 10/27/2023 at 1:37 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

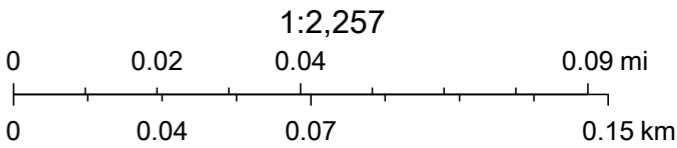
This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

# OCD - Waterbodies



10/5/2023, 1:53:15 PM

— OSE Streams



Maxar, Microsoft, Esri, HERE, Garmin, IPC, NM OSE

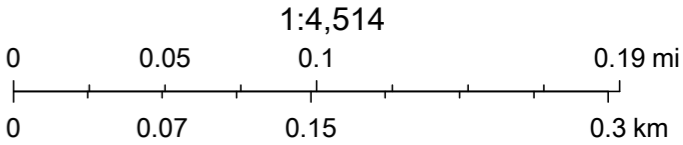
# OCD - Karst Potential



10/5/2023, 1:52:03 PM

Karst Occurrence Potential

- High
- Medium



BLM, OCD, New Mexico Tech, Esri, HERE, Garmin, iPC, Maxar



# New Mexico Office of the State Engineer

## Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced,  
O=orphaned,  
C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD Number	POD Sub-Code	basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	Depth Well	Depth Water	Water Column
<a href="#">C 04528 POD1</a>	CUB	ED		1	3	3	12	22S	30E	608886	3585625	1640			
<a href="#">C 03234 EXPLORE</a>	CUB	ED		1	2	3	35	21S	30E	607695	3589207*	2166	410		
<a href="#">C 03003</a>	CUB	ED		3	1	3	31	21S	31E	610511	3588970*	3023	650		
<a href="#">C 02749</a>	CUB	ED		1	1	1	18	22S	31E	610556	3585146*	3095	640		
<a href="#">C 02750</a>	CUB	ED		1	1	1	18	22S	31E	610556	3585146*	3095	741		
<a href="#">C 02751</a>	CUB	ED		1	1	1	18	22S	31E	610556	3585146*	3095	637		
<a href="#">C 02723</a>	CUB	ED		2	2	3	15	22S	30E	606282	3584363*	3300	651		
<a href="#">C 03002</a>	CUB	ED		4	2	4	06	22S	31E	611933	3587375*	3798	668		
<a href="#">C 02950 EXPL</a>	CUB	ED		4	2	4	23	22S	30E	608740	3582576*	4551	845		
<a href="#">C 02637</a>	CUB	ED		1	3	3	24	22S	30E	608950	3582377*	4779	759		
<a href="#">C 03773 POD1</a>	C	CUB	ED	4	2	2	32	21S	30E	604039	3589799	4920	55		
<a href="#">C 03774 POD1</a>	C	CUB	ED	2	4	2	32	21S	30E	604039	3589799	4920	32		
<a href="#">C 03772 POD1</a>	C	CUB	ED	2	4	2	32	21S	30E	603859	3589714	5026	30		
<a href="#">C 03772 POD2</a>	C	CUB	ED	4	2	2	32	21S	30E	603850	3589707	5031	30		
<a href="#">C 03772 POD3</a>	C	CUB	ED	4	2	2	32	21S	30E	603840	3589699	5034	30		
<a href="#">C 03772 POD8</a>	C	CUB	ED	4	2	2	32	21S	30E	603797	3589636	5039	30		
<a href="#">C 03772 POD6</a>	C	CUB	ED	4	2	2	32	21S	30E	603814	3589666	5040	30		
<a href="#">C 03772 POD5</a>	C	CUB	ED	4	2	2	32	21S	30E	603823	3589681	5040	30		
<a href="#">C 03772 POD7</a>	C	CUB	ED	4	2	2	32	21S	30E	603805	3589655	5042	30		
<a href="#">C 03772 POD4</a>	C	CUB	ED	4	2	2	32	21S	30E	603824	3589692	5045	30		
<a href="#">C 03015</a>	CUB	ED		1	4	3	22	22S	30E	606099	3582353*	5158	1316	262	1054
<a href="#">C 02748</a>	CUB	ED		1	2	3	17	22S	31E	612576	3584364*	5201	3856		
<a href="#">C 02683</a>	CUB	ED		3	1	1	20	22S	31E	612184	3583356*	5499	840		

\*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

Average Depth to Water: 262 feet  
Minimum Depth: 262 feet  
Maximum Depth: 262 feet

Record Count: 23

UTMNAD83 Radius Search (in meters):

Easting (X): 608144.87      Northing (Y): 3587087.96      Radius: 5500

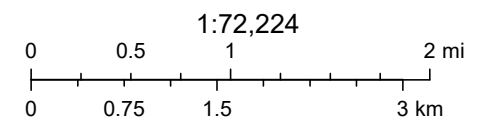
## OCD Induced Seismicity Area



2/20/2024, 8:55:39 AM

Seismic Response 3.0 to 3.4

 10 mi.

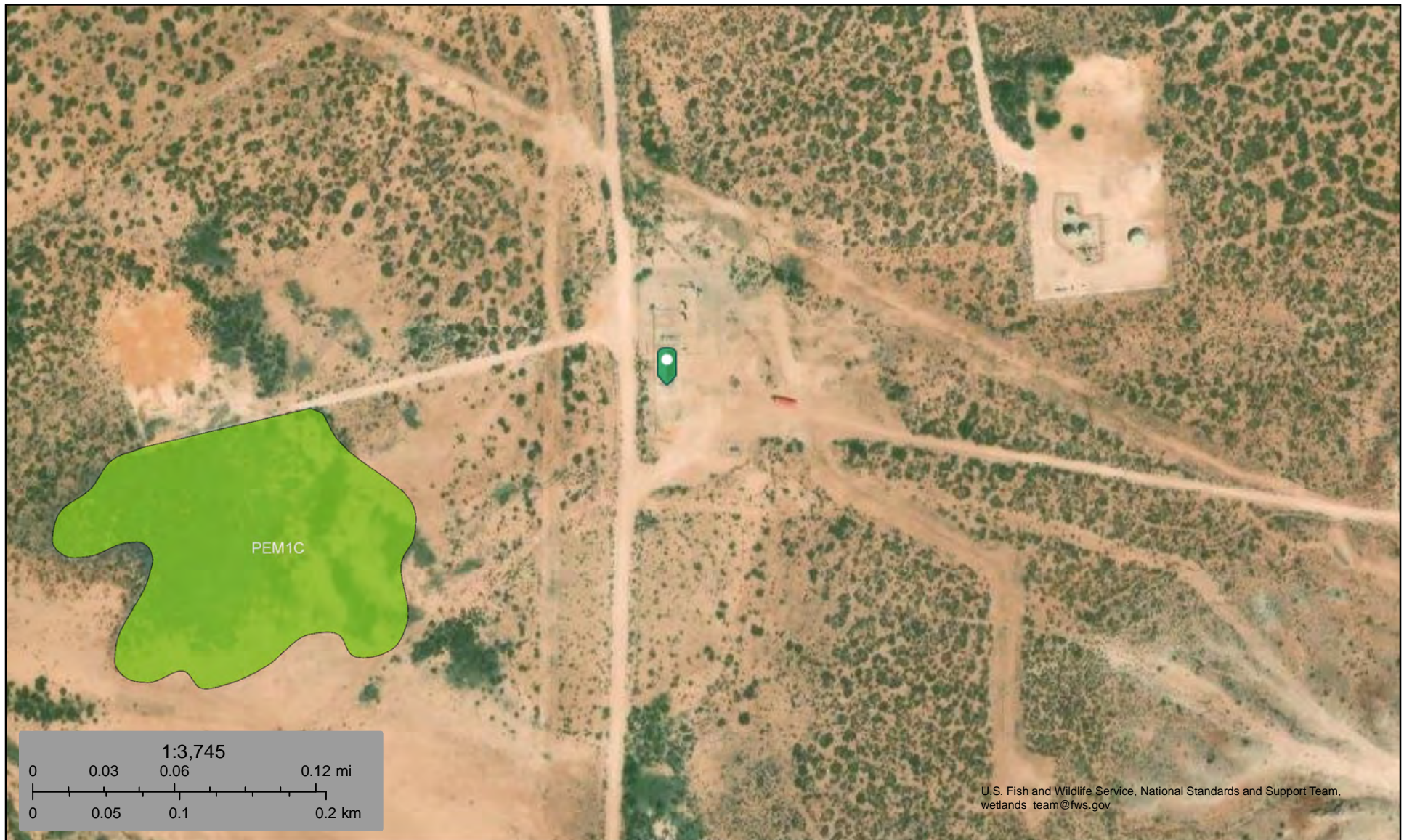


Oil Conservation Division (OCD), Energy, Minerals and Natural Resources  
Department (EMNRD), Esri, HERE, Garmin, Earthstar Geographics

New Mexico Oil Conservation Division



## Wetlands



February 20, 2024

**Wetlands**

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

- Lake
- Other
- Riverine

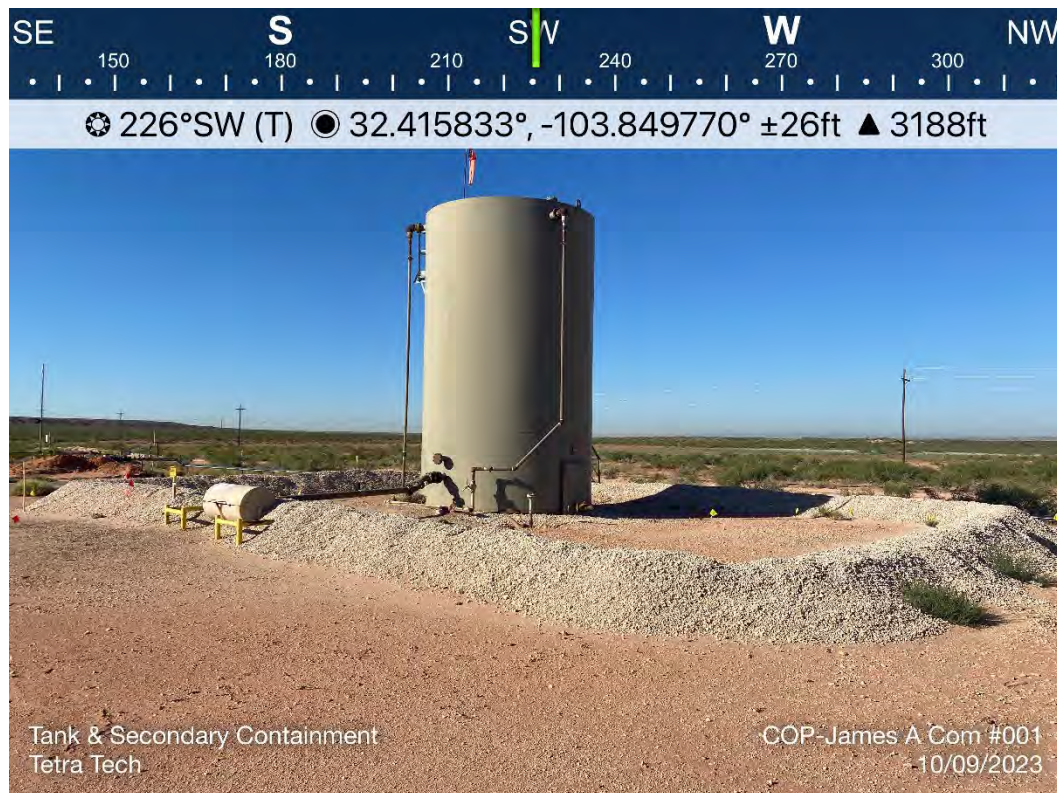
This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

## **APPENDIX D**

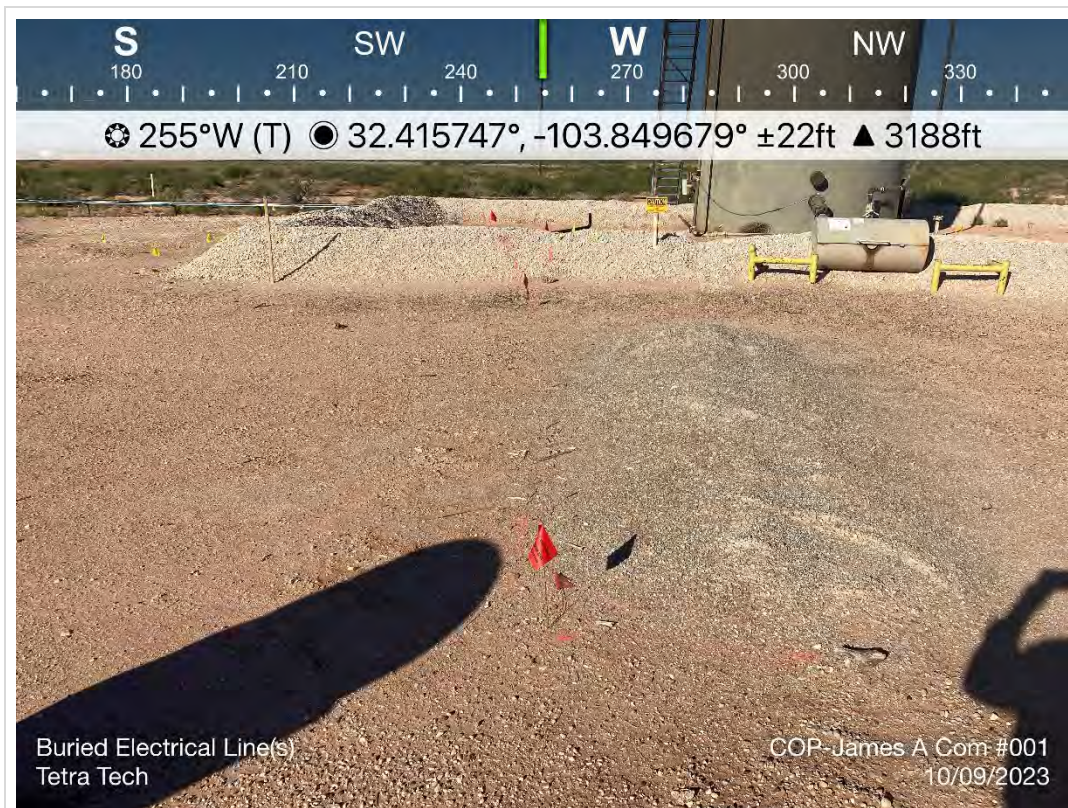
# **Photographic Documentation**



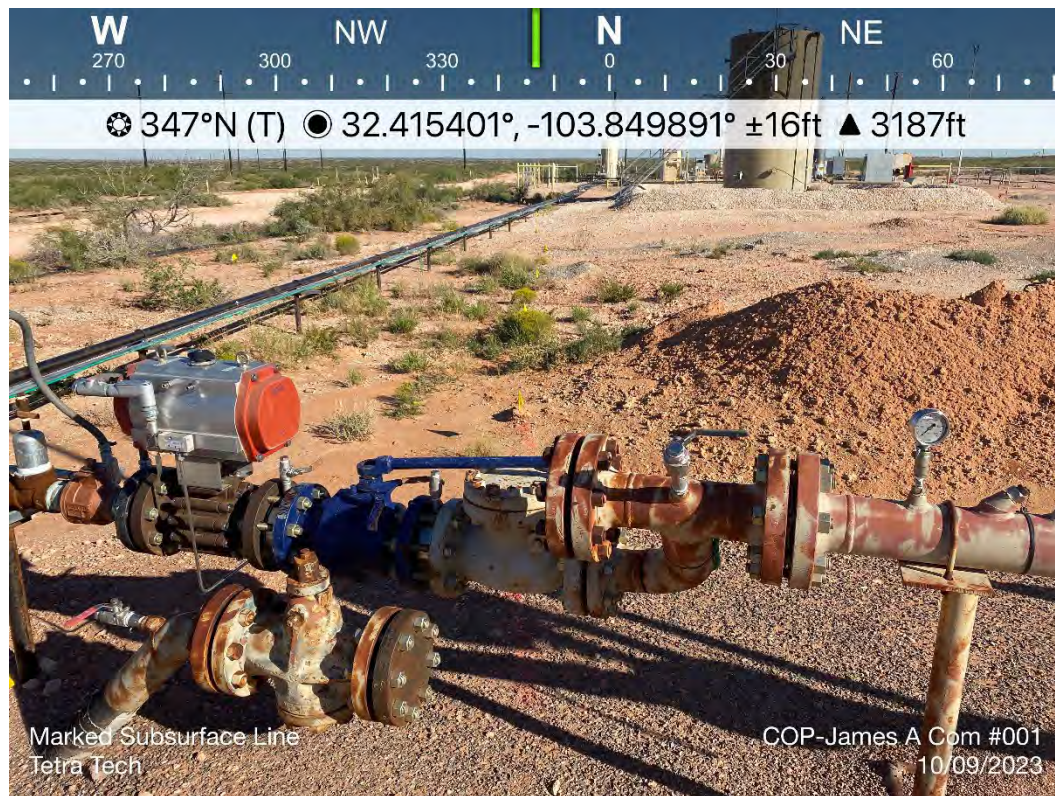
TETRA TECH, INC. PROJECT NO. 212C-MD-03239	DESCRIPTION	View of sight signage. James A Com #001.	1
	SITE NAME	JAMES A COM #001 TANK RELEASE	10/9/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03239	DESCRIPTION	View southwest of tank and secondary containment berm.	2
	SITE NAME	JAMES A COM #001 TANK RELEASE	10/9/2023



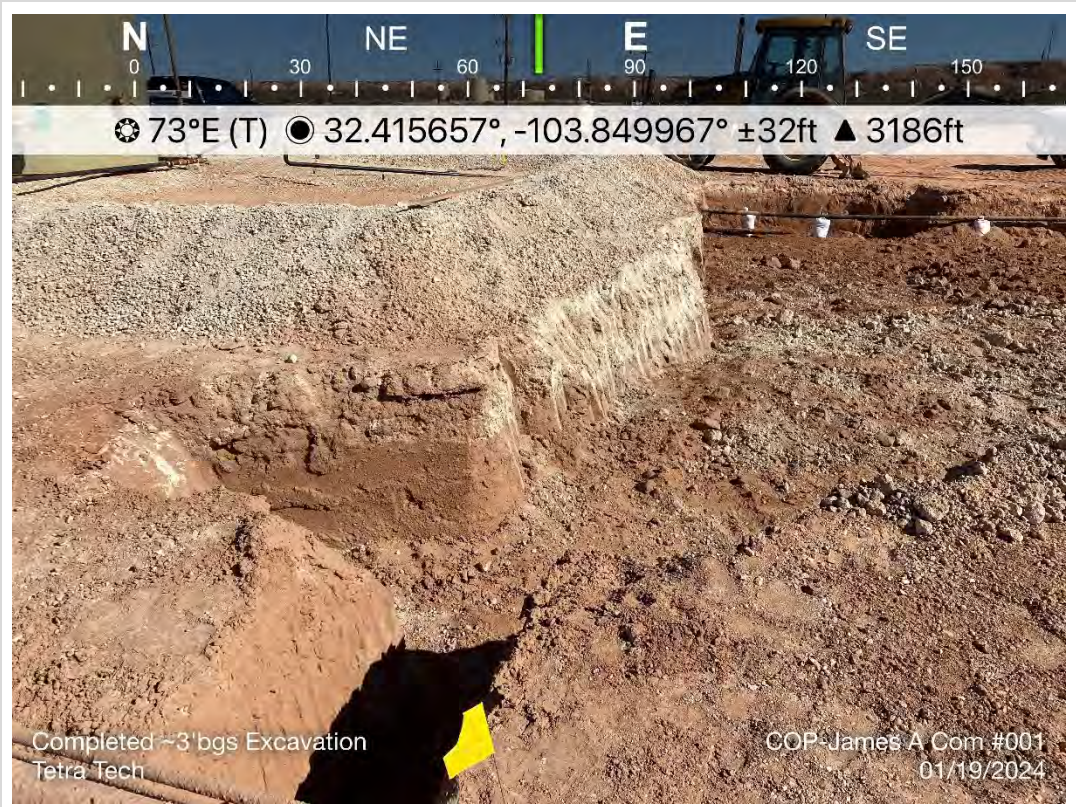
TETRA TECH, INC. PROJECT NO. 212C-MD-03239	DESCRIPTION	View west-southwest of tank and secondary containment berm. Subsurface electrical lines and pipeline.	3
	SITE NAME	JAMES A COM #001 TANK RELEASE	10/9/2023



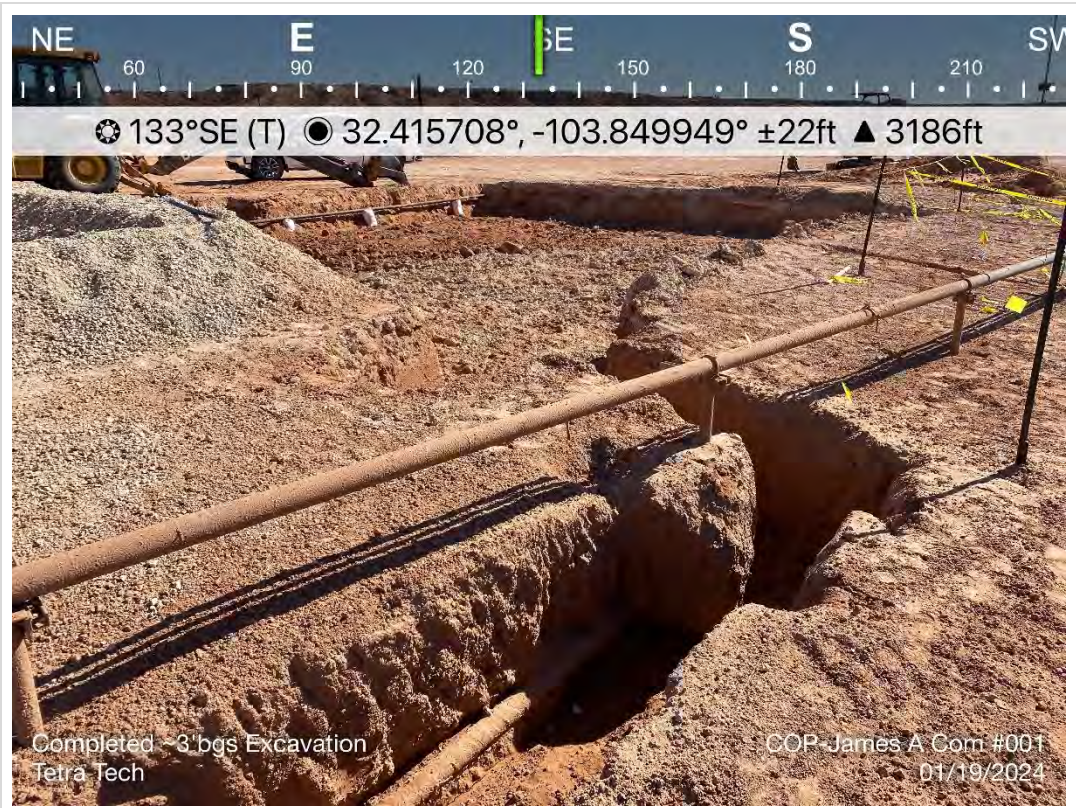
TETRA TECH, INC. PROJECT NO. 212C-MD-03239	DESCRIPTION	View north of marked subsurface line and surface steel lines.	4
	SITE NAME	JAMES A COM #001 TANK RELEASE	10/9/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03239	DESCRIPTION	View northwest of excavated area of approximately 3 ft bgs near exposed subsurface line.	5
	SITE NAME	JAMES A COM #001 TANK RELEASE	1/19/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03239	DESCRIPTION	View east-northeast of excavated area of approximately 3 ft bgs near exposed subsurface line.	6
	SITE NAME	JAMES A COM #001 TANK RELEASE	1/19/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03239	DESCRIPTION	View southeast of excavated area of approximately 3 ft bgs near exposed surface and subsurface lines.	7
	SITE NAME	JAMES A COM #001 TANK RELEASE	1/19/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03239	DESCRIPTION	View north of excavated area of approximately 1 ft bgs near raised surface lines.	8
	SITE NAME	JAMES A COM #001 TANK RELEASE	1/19/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03239	DESCRIPTION	View north-northwest of backfilled excavation.	9
	SITE NAME	JAMES A COM #001 TANK RELEASE	1/23/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03239	DESCRIPTION	View south of backfilled excavation.	10
	SITE NAME	JAMES A COM #001 TANK RELEASE	1/23/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03239	DESCRIPTION	View north of backfilled excavation.	11
	SITE NAME	JAMES A COM #001 TANK RELEASE	1/23/2024

## **APPENDIX E**

# **Laboratory Analytical Reports**



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

January 19, 2024

CHRISTIAN LLULL

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: JAMES A COM #001 TANK RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 01/18/24 15:40.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-23-16. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/18/2024	Sampling Date:	01/18/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	JAMES A COM #001 TANK RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03239	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO, NM		

**Sample ID: NSW - 1 (H240218-01)**

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	01/18/2024	ND	2.21	110	2.00	5.72	
Toluene*	<0.050	0.050	01/18/2024	ND	2.20	110	2.00	5.83	
Ethylbenzene*	<0.050	0.050	01/18/2024	ND	2.18	109	2.00	5.94	
Total Xylenes*	<0.150	0.150	01/18/2024	ND	6.37	106	6.00	5.96	
Total BTX	<0.300	0.300	01/18/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 98.0 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	240	16.0	01/19/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/18/2024	ND	205	102	200	2.03	
DRO >C10-C28*	<10.0	10.0	01/18/2024	ND	208	104	200	2.95	
EXT DRO >C28-C36	<10.0	10.0	01/18/2024	ND					

Surrogate: 1-Chlorooctane 87.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 87.5 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

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

Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/18/2024	Sampling Date:	01/18/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	JAMES A COM #001 TANK RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03239	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO, NM		

**Sample ID: NSW - 2 (H240218-02)**

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	01/18/2024	ND	2.21	110	2.00	5.72		
Toluene*	<0.050	0.050	01/18/2024	ND	2.20	110	2.00	5.83		
Ethylbenzene*	<0.050	0.050	01/18/2024	ND	2.18	109	2.00	5.94		
Total Xylenes*	<0.150	0.150	01/18/2024	ND	6.37	106	6.00	5.96		
Total BTEX	<0.300	0.300	01/18/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 98.4 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	144	16.0	01/19/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/18/2024	ND	205	102	200	2.03	
DRO >C10-C28*	<10.0	10.0	01/18/2024	ND	208	104	200	2.95	
EXT DRO >C28-C36	<10.0	10.0	01/18/2024	ND					

Surrogate: 1-Chlorooctane 93.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 91.9 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

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

Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/18/2024	Sampling Date:	01/18/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	JAMES A COM #001 TANK RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03239	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO, NM		

**Sample ID: ESW - 1 (H240218-03)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	01/18/2024	ND	2.21	110	2.00	5.72	
Toluene*	<0.050	0.050	01/18/2024	ND	2.20	110	2.00	5.83	
Ethylbenzene*	<0.050	0.050	01/18/2024	ND	2.18	109	2.00	5.94	
Total Xylenes*	<0.150	0.150	01/18/2024	ND	6.37	106	6.00	5.96	
Total BTEX	<0.300	0.300	01/18/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 96.9 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	256	16.0	01/19/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	<10.0	10.0	01/18/2024	ND	205	102	200	2.03		
DRO >C10-C28*	<10.0	10.0	01/18/2024	ND	208	104	200	2.95		
EXT DRO >C28-C36	<10.0	10.0	01/18/2024	ND						

Surrogate: 1-Chlorooctane 91.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 88.5 % 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:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/18/2024	Sampling Date:	01/18/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	JAMES A COM #001 TANK RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03239	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO, NM		

**Sample ID: WSW - 1 (H240218-04)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	01/18/2024	ND	2.21	110	2.00	5.72		
Toluene*	<0.050	0.050	01/18/2024	ND	2.20	110	2.00	5.83		
Ethylbenzene*	<0.050	0.050	01/18/2024	ND	2.18	109	2.00	5.94		
Total Xylenes*	<0.150	0.150	01/18/2024	ND	6.37	106	6.00	5.96		
Total BTEX	<0.300	0.300	01/18/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 98.5 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	288	16.0	01/19/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/18/2024	ND	205	102	200	2.03	
DRO >C10-C28*	<10.0	10.0	01/18/2024	ND	208	104	200	2.95	
EXT DRO >C28-C36	<10.0	10.0	01/18/2024	ND					

Surrogate: 1-Chlorooctane 95.9 % 48.2-134

Surrogate: 1-Chlorooctadecane 93.4 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/18/2024	Sampling Date:	01/18/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	JAMES A COM #001 TANK RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03239	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO, NM		

**Sample ID: WSW - 2 (H240218-05)**

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	01/18/2024	ND	2.21	110	2.00	5.72		
Toluene*	<0.050	0.050	01/18/2024	ND	2.20	110	2.00	5.83		
Ethylbenzene*	<0.050	0.050	01/18/2024	ND	2.18	109	2.00	5.94		
Total Xylenes*	<0.150	0.150	01/18/2024	ND	6.37	106	6.00	5.96		
Total BTEX	<0.300	0.300	01/18/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 99.0 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	192	16.0	01/19/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/18/2024	ND	205	102	200	2.03	
DRO >C10-C28*	<10.0	10.0	01/18/2024	ND	208	104	200	2.95	
EXT DRO >C28-C36	<10.0	10.0	01/18/2024	ND					

Surrogate: 1-Chlorooctane 96.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 94.5 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/18/2024	Sampling Date:	01/18/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	JAMES A COM #001 TANK RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03239	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO, NM		

**Sample ID: SSW - 1 (H240218-06)**

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	01/18/2024	ND	2.21	110	2.00	5.72		
Toluene*	<0.050	0.050	01/18/2024	ND	2.20	110	2.00	5.83		
Ethylbenzene*	<0.050	0.050	01/18/2024	ND	2.18	109	2.00	5.94		
Total Xylenes*	<0.150	0.150	01/18/2024	ND	6.37	106	6.00	5.96		
Total BTEX	<0.300	0.300	01/18/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 98.2 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	160	16.0	01/19/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/18/2024	ND	205	102	200	2.03	
DRO >C10-C28*	<10.0	10.0	01/18/2024	ND	208	104	200	2.95	
EXT DRO >C28-C36	<10.0	10.0	01/18/2024	ND					

Surrogate: 1-Chlorooctane 89.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 85.8 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/18/2024	Sampling Date:	01/18/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	JAMES A COM #001 TANK RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03239	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO, NM		

**Sample ID: FS - 1 (H240218-07)**

BTX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	01/18/2024	ND	2.21	110	2.00	5.72		
Toluene*	<0.050	0.050	01/18/2024	ND	2.20	110	2.00	5.83		
Ethylbenzene*	<0.050	0.050	01/18/2024	ND	2.18	109	2.00	5.94		
Total Xylenes*	<0.150	0.150	01/18/2024	ND	6.37	106	6.00	5.96		
Total BTX	<0.300	0.300	01/18/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 98.3 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	528	16.0	01/19/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/18/2024	ND	205	102	200	2.03	
DRO >C10-C28*	<10.0	10.0	01/18/2024	ND	208	104	200	2.95	
EXT DRO >C28-C36	<10.0	10.0	01/18/2024	ND					

Surrogate: 1-Chlorooctane 88.4 % 48.2-134

Surrogate: 1-Chlorooctadecane 84.4 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/18/2024	Sampling Date:	01/18/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	JAMES A COM #001 TANK RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03239	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO, NM		

**Sample ID: FS - 2 (H240218-08)**

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	01/18/2024	ND	2.21	110	2.00	5.72		
Toluene*	<0.050	0.050	01/18/2024	ND	2.20	110	2.00	5.83		
Ethylbenzene*	<0.050	0.050	01/18/2024	ND	2.18	109	2.00	5.94		
Total Xylenes*	<0.150	0.150	01/18/2024	ND	6.37	106	6.00	5.96		
Total BTEX	<0.300	0.300	01/18/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 97.6 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	512	16.0	01/19/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/18/2024	ND	205	102	200	2.03	
DRO >C10-C28*	<10.0	10.0	01/18/2024	ND	208	104	200	2.95	
EXT DRO >C28-C36	<10.0	10.0	01/18/2024	ND					

Surrogate: 1-Chlorooctane 89.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 85.8 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/18/2024	Sampling Date:	01/18/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	JAMES A COM #001 TANK RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03239	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO, NM		

**Sample ID: FS - 3 (H240218-09)**

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	01/18/2024	ND	2.21	110	2.00	5.72		
Toluene*	<0.050	0.050	01/18/2024	ND	2.20	110	2.00	5.83		
Ethylbenzene*	<0.050	0.050	01/18/2024	ND	2.18	109	2.00	5.94		
Total Xylenes*	<0.150	0.150	01/18/2024	ND	6.37	106	6.00	5.96		
Total BTEX	<0.300	0.300	01/18/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 98.4 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	336	16.0	01/19/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/18/2024	ND	205	102	200	2.03	
DRO >C10-C28*	<10.0	10.0	01/18/2024	ND	208	104	200	2.95	
EXT DRO >C28-C36	<10.0	10.0	01/18/2024	ND					

Surrogate: 1-Chlorooctane 88.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 83.5 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/18/2024	Sampling Date:	01/18/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	JAMES A COM #001 TANK RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03239	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO, NM		

**Sample ID: FS - 4 (H240218-10)**

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	01/18/2024	ND	2.21	110	2.00	5.72		
Toluene*	<0.050	0.050	01/18/2024	ND	2.20	110	2.00	5.83		
Ethylbenzene*	<0.050	0.050	01/18/2024	ND	2.18	109	2.00	5.94		
Total Xylenes*	<0.150	0.150	01/18/2024	ND	6.37	106	6.00	5.96		
Total BTEX	<0.300	0.300	01/18/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 97.4 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	272	16.0	01/19/2024	ND	448	112	400	0.00	QM-07	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/18/2024	ND	205	102	200	2.03	
DRO >C10-C28*	<10.0	10.0	01/18/2024	ND	208	104	200	2.95	
EXT DRO >C28-C36	<10.0	10.0	01/18/2024	ND					

Surrogate: 1-Chlorooctane 82.1 % 48.2-134

Surrogate: 1-Chlorooctadecane 78.5 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/18/2024	Sampling Date:	01/18/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	JAMES A COM #001 TANK RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03239	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO, NM		

**Sample ID: BZ - 1 (H240218-11)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	01/18/2024	ND	2.21	110	2.00	5.72		
Toluene*	<0.050	0.050	01/18/2024	ND	2.20	110	2.00	5.83		
Ethylbenzene*	<0.050	0.050	01/18/2024	ND	2.18	109	2.00	5.94		
Total Xylenes*	<0.150	0.150	01/18/2024	ND	6.37	106	6.00	5.96		
Total BTEx	<0.300	0.300	01/18/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 97.9 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	448	16.0	01/19/2024	ND	448	112	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/18/2024	ND	205	102	200	2.03	
DRO >C10-C28*	<10.0	10.0	01/18/2024	ND	208	104	200	2.95	
EXT DRO >C28-C36	<10.0	10.0	01/18/2024	ND					

Surrogate: 1-Chlorooctane 88.3 % 48.2-134

Surrogate: 1-Chlorooctadecane 84.4 % 49.1-148

Cardinal Laboratories

\*=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:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/18/2024	Sampling Date:	01/18/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	JAMES A COM #001 TANK RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03239	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO, NM		

**Sample ID: BZ - 2 (H240218-12)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	01/18/2024	ND	2.21	110	2.00	5.72		
Toluene*	<0.050	0.050	01/18/2024	ND	2.20	110	2.00	5.83		
Ethylbenzene*	<0.050	0.050	01/18/2024	ND	2.18	109	2.00	5.94		
Total Xylenes*	<0.150	0.150	01/18/2024	ND	6.37	106	6.00	5.96		
Total BTEx	<0.300	0.300	01/18/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 97.5 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	304	16.0	01/19/2024	ND	448	112	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/18/2024	ND	205	102	200	2.03	
DRO >C10-C28*	<10.0	10.0	01/18/2024	ND	208	104	200	2.95	
EXT DRO >C28-C36	<10.0	10.0	01/18/2024	ND					

Surrogate: 1-Chlorooctane 86.3 % 48.2-134

Surrogate: 1-Chlorooctadecane 81.3 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

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

Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/18/2024	Sampling Date:	01/18/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	JAMES A COM #001 TANK RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03239	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO, NM		

**Sample ID: BZ - 3 (H240218-13)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	01/18/2024	ND	2.21	110	2.00	5.72		
Toluene*	<0.050	0.050	01/18/2024	ND	2.20	110	2.00	5.83		
Ethylbenzene*	<0.050	0.050	01/18/2024	ND	2.18	109	2.00	5.94		
Total Xylenes*	<0.150	0.150	01/18/2024	ND	6.37	106	6.00	5.96		
Total BTEX	<0.300	0.300	01/18/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 98.6 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	01/19/2024	ND	448	112	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/18/2024	ND	205	102	200	2.03	
DRO >C10-C28*	<10.0	10.0	01/18/2024	ND	208	104	200	2.95	
EXT DRO >C28-C36	<10.0	10.0	01/18/2024	ND					

Surrogate: 1-Chlorooctane 91.9 % 48.2-134

Surrogate: 1-Chlorooctadecane 87.9 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

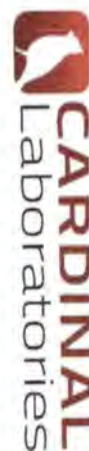
- QM-07      The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
- ND          Analyte NOT DETECTED at or above the reporting limit
- RPD        Relative Percent Difference
- \*\*          Samples not received at proper temperature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

Cardinal Laboratories \*=Accredited Analyte

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A handwritten signature in black ink, appearing to read "C. D. Keene", written over a horizontal line.

Celey D. Keene, Lab Director/Quality Manager



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

**CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

[illegible]



### CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

[illegible]



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

February 16, 2024

CHRISTIAN LLULL

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: JAMES A COM #001 TANK RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 02/15/24 11:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-23-16. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	02/15/2024	Sampling Date:	02/15/2024
Reported:	02/16/2024	Sampling Type:	Soil
Project Name:	JAMES A COM #001 TANK RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03239	Sample Received By:	Shalyn Rodriguez
Project Location:	COP - EDDY CO, NM		

**Sample ID: BACKFILL - COMPOSITE (H240726-01)**

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/15/2024	ND	2.07	104	2.00	3.24	
Toluene*	<0.050	0.050	02/15/2024	ND	2.17	109	2.00	3.64	
Ethylbenzene*	<0.050	0.050	02/15/2024	ND	2.16	108	2.00	3.48	
Total Xylenes*	<0.150	0.150	02/15/2024	ND	6.57	109	6.00	3.60	
Total BTX	<0.300	0.300	02/15/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 116 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	112	16.0	02/16/2024	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/16/2024	ND	212	106	200	2.63	
DRO >C10-C28*	<10.0	10.0	02/16/2024	ND	200	99.9	200	3.94	
EXT DRO >C28-C36	<10.0	10.0	02/16/2024	ND					

Surrogate: 1-Chlorooctane 126 % 48.2-134

Surrogate: 1-Chlorooctadecane 136 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

### Notes and Definitions

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

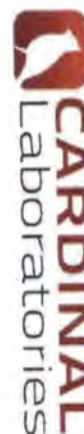
Cardinal Laboratories

\*=Accredited Analyte

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

Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name: Tetra Tech				<b>BILL TO</b>				ANALYSIS REQUEST							
Project Manager: Christian Lull				P.O. #:											
Address: 8911 Capital of Texas Hwy, Suite 2310				Company: Tetra Tech											
City: Austin				State: TX Zip:				Attn: Christian Lull							
Phone #: (512)565-0190 Fax #:				City:				Address: EMAIL							
Project #: 212C-MD-03239 Project Owner: ConocoPhillips				State: Zip:											
Project Location: Eddy County, New Mexico				Phone #:											
Sampler Name: Colton Bickstaff				Fax #:											
FOR LAB USE ONLY															
Lab I.D.				MATRIX				PRESERV.				SAMPLING			
Sample I.D.				(G)RAB OR (C)COMP.				TPH 8015M							
				# CONTAINERS											
Backfill-Composite				GROUNDWATER				BTEX 8021B							
				WASTEWATER											
1				SOIL				Chloride SM4500Cl-B							
				OIL											
				SLUDGE				DATE							
				OTHER : ACID/BASE:											
				ICE / COOL				TIME							
				OTHER :											
				DATE											
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## **APPENDIX F**

### **Waste Manifests**



Permian Basin

Customer #: CRI2190  
Ordered by: COLTON BICKERSTAFF  
AFE #:  
PO #:  
Manifest #: 2  
Manif. Date: 1/18/2024  
Hauler: MCNABB PARTNERS  
Driver: ACIE  
Truck #: M83  
Card #  
Job Ref #

Bid #: O6UJ9A000JEC  
Date: 1/18/2024  
Generator: CONOCOPHILLIPS  
Generator #: 40946  
Well Ser. #: 10806  
Well Name: JAMES A COM  
Well #: 001  
Field:  
Field #:  
Rig: NON-DRILLING  
County: EDDY (NM)

Facility: CRI

Product / Service

Quantity Units

Contaminated Soil (RCRA Exempt)

20.00 yards

18

**Generator Certification Statement of Waste Status**

I hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is:

- ☒ RCRA Exempt: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste  
☐ RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24 or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items)  
☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☐ Process Knowledge ☐ Other (Provide description above)

Driver/ Agent Signature

R360 Representative Signature

Customer Approval

**THIS IS NOT AN INVOICE!**

Approved By: \_\_\_\_\_

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



Permian Basin

Customer: CONOCOPHILLIPS  
Customer #: CRI2190  
Ordered by: COLTON BICKERSTAFF  
AFE #:  
PO #:  
Manifest #: 3  
Manif. Date: 1/18/2024  
Hauler: MCNABB PARTNERS  
Driver: JOSH  
Truck #: M87  
Card #  
Job Ref #

Ticket #: 700-1521163  
Bid #: O6UJ9A000JEC  
Date: 1/18/2024  
Generator: CONOCOPHILLIPS  
Generator #: 40946  
Well Ser. #: 10806  
Well Name: JAMES A COM  
Well #: 001  
Field:  
Field #:  
Rig: NON-DRILLING  
County: EDDY (NM)

Facility: CRI

## Product / Service

## Quantity Units

Contaminated Soil (RCRA Exempt)

18.00 yards

## Generator Certification Statement of Waste Status

I hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is:

☒ RCRA Exempt: Oil Field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste  
☐ RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24 or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items)  
☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☐ Process Knowledge ☐ Other (Provide description above)

Driver/ Agent Signature

R360 Representative Signature

Customer Approval

**THIS IS NOT AN INVOICE!**

Approved By: \_\_\_\_\_

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



Permian Basin

Customer #: CRI2190  
Ordered by: COLTON BICKERSTAFF  
AFE #:  
PO #:  
Manifest #: 4  
Manif. Date: 1/18/2024  
Hauler: MCNABB PARTNERS LLC  
Driver: ACEI  
Truck #: M83  
Card #  
Job Ref #

Bid #: O6UJ9A000JEC  
Date: 1/18/2024  
Generator: CONOCOPHILLIPS  
Generator #: 40946  
Well Ser. #: 10806  
Well Name: JAMES A COM  
Well #: 001  
Field:  
Field #:  
Rig: NON-DRILLING  
County: EDDY (NM)

Facility: CRI

Product / Service

Quantity Units

Contaminated Soil (RCRA Exempt)

18.00 yards

**Generator Certification Statement of Waste Status**

I hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is:

☒ RCRA Exempt: Oil Field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste  
☐ RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24 or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items)  
☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☐ Process Knowledge ☐ Other (Provide description above)

Driver/ Agent Signature

R360 Representative Signature

Customer Approval

**THIS IS NOT AN INVOICE!**

Approved By: \_\_\_\_\_

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

Customer: CONOCOPHILLIPS

Ticket #: 700-1521332

Customer #: CRI2190

Bid #: O6UJ9A000JEC

Ordered by: COLTON BICKERSTAFF

Date: 1/18/2024

AFE #:

Generator: CONOCOPHILLIPS

PO #:

Generator #: 40946

Manifest #: 5

Well Ser. #: 10806

Manif. Date: 1/18/2024

Well Name: JAMES A COM

Hauler: MCNABB PARTNERS LLC

Well #: 001

Driver: JOSH

Field:

Truck #: M87

Field #:

Card #

Rig: NON-DRILLING

Job Ref #

County: EDDY (NM)



Permian Basin

Facility: CRI

Product / Service

Quantity Units

Contaminated Soil (RCRA Exempt)

18.00 yards

**Generator Certification Statement of Waste Status**

I hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is:

☒ RCRA Exempt: Oil Field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste  
☐ RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24 or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items)  
☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☐ Process Knowledge ☐ Other (Provide description above)

Driver/ Agent Signature

R360 Representative Signature

Customer Approval

**THIS IS NOT AN INVOICE!**

Approved By: \_\_\_\_\_

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



Permian Basin

Customer #: CRI2190  
Ordered by: COLTAN BAKERSTAFF  
AFE #:  
PO #:  
Manifest #: 6  
Manif. Date: 1/19/2024  
Hauler: MCNABB PARTNERS  
Driver: MANUEL  
Truck #: M37  
Card #  
Job Ref #

Bid #: O6UJ9A000JEC  
Date: 1/19/2024  
Generator: CONOCOPHILLIPS  
Generator #: 40946  
Well Ser. #: 10806  
Well Name: JAMES A COM  
Well #: 001  
Field:  
Field #:  
Rig: NON-DRILLING  
County: EDDY (NM)

Facility: CRI

Product / Service

Quantity Units

Contaminated Soil (RCRA Exempt)

14.00 yards

**Generator Certification Statement of Waste Status**

I hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is:

- ☒ RCRA Exempt: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste  
☐ RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24 or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items):  
☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☐ Process Knowledge ☐ Other (Provide description above)

Driver/ Agent Signature

R360 Representative Signature

Customer Approval

**THIS IS NOT AN INVOICE!**

Approved By: \_\_\_\_\_

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



Permian Basin

Customer: CONOCOPHILLIPS  
Customer #: CRI2190  
Ordered by: COLTON BICKERSTAFF  
AFE #:  
PO #:  
Manifest #: 7  
Manif. Date: 1/19/2024  
Hauler: MCNABB PARTNERS LLC  
Driver: VICTOR  
Truck #: M36  
Card #  
Job Ref #

Ticket #: 700-1521590  
Bid #: O6UJ9A000JEC  
Date: 1/19/2024  
Generator: CONOCOPHILLIPS  
Generator #: 40946  
Well Ser. #: 10806  
Well Name: JAMES A COM  
Well #: 001  
Field:  
Field #:  
Rig: NON-DRILLING  
County: EDDY (NM)

Facility: CRI

Product / Service

Quantity Units

Contaminated Soil (RCRA Exempt)

18.00 yards

**Generator Certification Statement of Waste Status**

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Driver/ Agent Signature

R360 Representative Signature

Customer Approval

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



Permian Basin

Customer #: CRI2190  
Ordered by: COLTON BICKERSTAFF  
AFE #:  
PO #:  
Manifest #: 8  
Manif. Date: 1/19/2024  
Hauler: MCNABB PARTNERS LLC  
Driver: MANUEL  
Truck #: M37  
Card #  
Job Ref #

Bid #: O6UJ9A000JEC  
Date: 1/19/2024  
Generator: CONOCOPHILLIPS  
Generator #: 40946  
Well Ser. #: 10806  
Well Name: JAMES A COM  
Well #: 001  
Field:  
Field #:  
Rig: NON-DRILLING  
County: EDDY (NM)

Facility: CRI

Product / Service

Quantity Units

Contaminated Soil (RCRA Exempt)

14.00 yards

**Generator Certification Statement of Waste Status**

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Driver/ Agent Signature

R360 Representative Signature

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



Permian Basin

Customer #: CRI2190  
 Ordered by: COLTON BICKERSTAFF  
 AFE #:  
 PO #:  
 Manifest #: 9  
 Manif. Date: 1/19/2024  
 Hauler: MCNABB PARTNERS  
 Driver: VICTOR  
 Truck #: M36  
 Card #  
 Job Ref #

Bid #: O6UJ9A000JEC  
 Date: 1/19/2024  
 Generator: CONOCOPHILLIPS  
 Generator #: 40946  
 Well Ser. #: 10806  
 Well Name: JAMES A COM  
 Well #: 001  
 Field:  
 Field #:  
 Rig: NON-DRILLING  
 County: EDDY (NM)

Facility: CRI

## Product / Service

## Quantity Units

Contaminated Soil (RCRA Exempt)

16.00 yards

## Generator Certification Statement of Waste Status

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Driver/ Agent Signature

R360 Representative Signature

Customer Approval

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



Permian Basin

Customer #: CRI2190  
Ordered by: COLTON BICKERSTAFF  
AFE #:  
PO #:  
Manifest #: 10  
Manif. Date: 1/19/2024  
Hauler: MCNABB PARTNERS  
Driver: MANUEL  
Truck #: M37  
Card #  
Job Ref #

Bid #: O6UJ9A000JEC  
Date: 1/19/2024  
Generator: CONOCOPHILLIPS  
Generator #: 40946  
Well Ser. #: 10806  
Well Name: JAMES A COM  
Well #: 001  
Field:  
Field #:  
Rig: NON-DRILLING  
County: EDDY (NM)

Facility: CRI

Product / Service

Quantity Units

Contaminated Soil (RCRA Exempt)

14.00 yards

**Generator Certification Statement of Waste Status**

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Driver/ Agent Signature

R360 Representative Signature

Customer Approval

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



Permian Basin

Customer #: CRI2190  
Ordered by: COLTON BICKERSTAFF  
AFE #:  
PO #:  
Manifest #: 11  
Manif. Date: 1/19/2024  
Hauler: MCNABB PARTNERS  
Driver: VICTOR  
Truck #: M36  
Card #  
Job Ref #

Bid #: O6UJ9A000JEC  
Date: 1/19/2024  
Generator: CONOCOPHILLIPS  
Generator #: 40946  
Well Ser. #: 10806  
Well Name: JAMES A COM  
Well #: 001  
Field:  
Field #:  
Rig: NON-DRILLING  
County: EDDY (NM)

Facility: CRI

Product / Service

Quantity Units

Contaminated Soil (RCRA Exempt)

16.00 yards

**Generator Certification Statement of Waste Status**

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Driver/ Agent Signature

R360 Representative Signature

Customer Approval

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



Permian Basin

Customer #: CRI2190  
 Ordered by: COLTON BICKERSTAFF  
 AFE #:  
 PO #:  
 Manifest #: 12  
 Manif. Date: 1/22/2024  
 Hauler: MCNABB PARTNERS  
 Driver: VICTOR  
 Truck #: M36  
 Card #  
 Job Ref #

Bid #: O6UJ9A000JEC  
 Date: 1/22/2024  
 Generator: CONOCOPHILLIPS  
 Generator #: 40946  
 Well Ser. #: 10806  
 Well Name: JAMES A COM  
 Well #: 001  
 Field:  
 Field #:  
 Rig: NON-DRILLING  
 County: EDDY (NM)

Facility: CRI

## Product / Service

## Quantity Units

Contaminated Soil (RCRA Exempt)

16.00 yards

## Generator Certification Statement of Waste Status

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Driver/ Agent Signature

R360 Representative Signature

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

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

QUESTIONS  
  
Action 318673

QUESTIONS

Operator: CONOCOPHILLIPS COMPANY 600 W. Illinois Avenue Midland, TX 79701	OGRID:
	217817
	Action Number:
	318673
Action Type:	
[C-141] Reclamation Report C-141 (C-141-v-Reclamation)	

QUESTIONS

Prerequisites	
Incident ID (n#)	nAB1722132401
Incident Name	NAB1722132401 JAMES A COM #001 @ 30-015-10806
Incident Type	Produced Water Release
Incident Status	Reclamation Report Received
Incident Well	[30-015-10806] JAMES A COM #001

Location of Release Source	
Please answer all the questions in this group.	
Site Name	JAMES A COM #001
Date Release Discovered	08/03/2017
Surface Owner	State

Incident Details	
Please answer all the questions in this group.	
Incident Type	Produced Water 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	Not answered.
Produced Water Released (bbls) Details	Cause: Overflow - Tank, Pit, Etc.   Tank (Any)   Produced Water   Released: 10 BBL   Recovered: 0 BBL   Lost: 10 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	No
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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QUESTIONS, Page 2

Action 318673

**QUESTIONS (continued)**

Operator: CONOCOPHILLIPS COMPANY 600 W. Illinois Avenue Midland, TX 79701	OGRID:
	217817
	Action Number:
	318673
Action Type:	
[C-141] Reclamation Report C-141 (C-141-v-Reclamation)	

**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	No
Reasons why this would be considered a submission for a notification of a major release	Unavailable.
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	Not answered.

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: Christian LLuLL Title: Project Manager Email: christian.llull@tetrattech.com Date: 02/28/2024
--	--

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**Santa Fe, NM 87505**

QUESTIONS, Page 3

Action 318673

**QUESTIONS (continued)**

Operator: CONOCOPHILLIPS COMPANY 600 W. Illinois Avenue Midland, TX 79701	OGRID:
	217817
	Action Number:
	318673
Action Type:	
[C-141] Reclamation Report C-141 (C-141-v-Reclamation)	

**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)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
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 300 and 500 (ft.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between ½ and 1 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Greater than 5 (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 500 and 1000 (ft.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	High
A 100-year floodplain	Greater than 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)	1420
TPH (GRO+DRO+MRO)	(EPA SW-846 Method 8015M)	27.1
GRO+DRO	(EPA SW-846 Method 8015M)	27.1
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	01/16/2024
On what date will (or did) the final sampling or liner inspection occur	01/18/2024
On what date will (or was) the remediation complete(d)	01/23/2024
What is the estimated surface area (in square feet) that will be reclaimed	1835
What is the estimated volume (in cubic yards) that will be reclaimed	180
What is the estimated surface area (in square feet) that will be remediated	1835
What is the estimated volume (in cubic yards) that will be remediated	180

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 318673

**QUESTIONS (continued)**

Operator: CONOCOPHILLIPS COMPANY 600 W. Illinois Avenue Midland, TX 79701	OGRID:	217817
	Action Number:	318673
	Action Type:	[C-141] Reclamation Report C-141 (C-141-v-Reclamation)

**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	HALFWAY DISPOSAL AND LANDFILL [fEEM0112334510]
<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	Not answered.
<b>OR</b> is the <b>off-site</b> disposal site, to be used, an NMED facility	Not answered.
(Ex Situ) Excavation and <b>on-site</b> remediation (i.e. On-Site Land Farms)	Not answered.
(In Situ) Soil Vapor Extraction	Not answered.
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	Not answered.
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	Not answered.
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	Not answered.
Ground Water Abatement pursuant to 19.15.30 NMAC	Not answered.
OTHER (Non-listed remedial process)	Not answered.
<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: Christian LLuLL Title: Project Manager Email: christian.llull@tetrattech.com Date: 02/28/2024
<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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State of New Mexico  
Energy, Minerals and Natural Resources  
Oil Conservation Division  
1220 S. St Francis Dr.  
Santa Fe, NM 87505

QUESTIONS, Page 5  
  
Action 318673

QUESTIONS (continued)

Operator: CONOCOPHILLIPS COMPANY 600 W. Illinois Avenue Midland, TX 79701	OGRID: 217817
	Action Number: 318673
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

Deferral Requests Only	
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 318673

**QUESTIONS (continued)**

Operator: CONOCOPHILLIPS COMPANY 600 W. Illinois Avenue Midland, TX 79701	OGRID:
	217817
	Action Number:
	318673
Action Type:	
[C-141] Reclamation Report C-141 (C-141-v-Reclamation)	

**QUESTIONS**

Sampling Event Information	
Last sampling notification (C-141N) recorded	302275
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	01/16/2024
What was the (estimated) number of samples that were to be gathered	14
What was the sampling surface area in square feet	2104

**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	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion	Yes
What was the total surface area (in square feet) remediated	1835
What was the total volume (cubic yards) remediated	180
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene	Yes
What was the total surface area (in square feet) reclaimed	1835
What was the total volume (in cubic yards) reclaimed	180
Summarize any additional remediation activities not included by answers (above)	NA

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

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

I hereby agree and sign off to the above statement	Name: Christian LLuLL Title: Project Manager Email: christian.llull@tetratech.com Date: 02/28/2024
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**District I**

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**District II**

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**District III**

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**District IV**

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

QUESTIONS, Page 7

Action 318673

**QUESTIONS (continued)**

Operator: CONOCOPHILLIPS COMPANY 600 W. Illinois Avenue Midland, TX 79701	OGRID: 217817
	Action Number: 318673
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

**QUESTIONS**

<b>Reclamation Report</b>	
<i>Only answer the questions in this group if all reclamation steps have been completed.</i>	
Requesting a reclamation approval with this submission	Yes
What was the total reclamation surface area (in square feet) for this site	1835
What was the total volume of replacement material (in cubic yards) for this site	180
<i>Per Paragraph (1) of Subsection D of 19.15.29.13 NMAC the reclamation must contain a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, or other test methods approved by the division. The soil cover must include a 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.</i>	
Is the soil top layer complete and is it suitable material to establish vegetation	Yes
On what (estimated) date will (or was) the reseeding commence(d)	01/23/2024
Summarize any additional reclamation activities not included by answers (above)	In accordance with 19.15.29.13 NMAC, all areas disturbed by the remediation have been reclaimed. Collected confirmation samples were placed into laboratory-provided sample containers, transferred under chain-of-custody, and analyzed within appropriate holding times by Cardinal. The soil samples were analyzed for TPH (GRO+DRO+MRO) by EPA Method 8015M, BTEX by EPA Method 8021B, and chlorides by SM4500Cl-B. The analytical results were directly compared to the reclamation requirements and established Site RRALS to demonstrate compliance. Once acceptable confirmation sample results were received, the excavation was backfilled with clean material to pre-release grade. All final confirmation soil samples (floor and sidewall) were below applicable cleanup levels for chloride, TPH, and BTEX. Excavated areas, depths and confirmation sample locations are indicated in Figure 4. In accordance with 19.15.29.12 NMAC, the reclaimed area contains a minimum non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by SM4500Cl-B. One (1) representative 5-point composite sample was collected from the backfill material used for the reclamation of the excavation.
<i>The responsible party must attach information demonstrating they have complied with all applicable reclamation requirements and any conditions or directives of the OCD. This demonstration should be in the form of attachments (in .pdf format) including a scaled site map, any proposed reseeding plans or relevant field notes, photographs of reclaimed area, and a narrative of the reclamation activities. Refer to 19.15.29.13 NMAC.</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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.	
I hereby agree and sign off to the above statement	Name: Christian LLuLL Title: Project Manager Email: christian.llull@tetratech.com Date: 02/28/2024

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QUESTIONS, Page 8  
  
Action 318673

QUESTIONS (continued)

Operator: CONOCOPHILLIPS COMPANY 600 W. Illinois Avenue Midland, TX 79701	OGRID:
	217817
	Action Number:
	318673
Action Type:	
[C-141] Reclamation Report C-141 (C-141-v-Reclamation)	

QUESTIONS

Revegetation Report	
Only answer the questions in this group if all surface restoration, reclamation and re-vegetation obligations have been satisfied.	
Requesting a restoration complete approval with this submission	No
Per Paragraph (4) of Subsection (D) of 19.15.29.13 NMAC for any major or minor release containing liquids, the responsible party must notify the division when reclamation and re-vegetation are complete.	

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CONDITIONS  
  
Action 318673

CONDITIONS

Operator: CONOCOPHILLIPS COMPANY 600 W. Illinois Avenue Midland, TX 79701	OGRID: 217817
	Action Number: 318673
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

CONDITIONS

Created By	Condition	Condition Date
crystal.walker	Closure & Reclamation Approved.	3/8/2024
crystal.walker	Operator failed to provide proper Sampling Notification pursuant to 19.15.29.12.D.(1).(a) NMAC. Failure to provide proper sampling notice is a compliance issue and OCD may pursue compliance actions pursuant to 19.15.5 NMAC. Operator shall ensure future compliance with 19.15.29.12.D.(1).(a) NMAC	3/8/2024