Cottonwood CONSULTING

P.O. Box 1653
Durango, Colorado 81302
(970) 764-7356
www.cottonwoodconsulting.com

January 8, 2024

Keith C. Manwell
Environmental Specialist
Jicarilla Apache Nation Environmental Protection Office
P.O. Box 507
Dulce, NM 87528

RE: Final Closure Plan – East Puerto Chiquito Mancos Unit #012 (API #30-039-06863)
Benson-Montin-Greer Drilling Corporation
Latitude/Longitude: 36.5394936/-106.8624573
Rio Arriba County, New Mexico

Dear Mr. Manwell,

Cottonwood Consulting, LLC (Cottonwood), on behalf of Benson-Montin-Greer Drilling Corporation (BMG), is pleased to provide you with a final closure plan for the recent and historical releases at BMG's East Puerto Chiquito Mancos Unit (EPCMU) #012 well site. Details regarding remedial efforts, sampling results, and final reclamation is summarized below.

Background

The EPCMU #012 was drilled in 1964 and completed in the Gallup Formation. During a recent site visit in November 2024 by the Jicarilla Apache Nation Environmental Protection Office (JAN-EPO), a release was observed in the vicinity of the wellhead. BMG was notified of the release and immediately shut in the wellhead to prevent any additional impacts. It was determined that a ball valve had frozen and split, which caused the release. Following discovery of the release, repairs were made, and a site assessment was conducted. During the site assessment an undocumented historical release was discovered in the area surrounding the wellhead. Soil sample results from the initial site assessment indicated impacts in exceedance of JAN-EPO standards. The JAN-EPO requested that BMG submit a final closure plan to summarize remedial efforts, sampling results, and final reclamation of the release area.

This final closure plan is being submitted to summarize the remedial efforts conducted to date and to document the proposed final closure activities. The BMG contact for the project is listed below:

Zach Stradling
Benson-Montin-Greer Drilling Corp.
4900 College Blvd.
Farmington, NM 87402
505-325-8874
zstradling@bmgdrilling.com

Remediation

On November 26, 2024, Cottonwood conducted a site assessment of the release area at the EPCMU #012. Approximately 5 yards of material was excavated from the release flowpath area prior to sampling and field screening. The flowpath was excavated to a depth of approximately 6-8 inches below ground surface (bgs) and the area surrounding the wellhead was excavated to approximately 3 feet bgs. One 5-point composite sample (SS01) was collected from the base of the flowpath excavation. One discrete grab sample (SS02) was collected at approximately 30 inches bgs adjacent to the wellhead. Both samples were submitted to Envirotech Analytical Laboratories (Envirotech) in Bloomfield, NM for laboratory analysis of total petroleum hydrocarbons (TPH) and benzene, toluene, ethylbenzene, and total xylenes (BTEX). Both samples SS01 and SS02 exceeded the JAN-EPO limit of 100 milligrams per kilogram (mg/kg) total TPH at concentrations of 1,986 mg/kg and 2,134 mg/kg, respectively.

On December 18, 2024, approximately 50 yards of additional material was removed from the historical release area to a depth of approximately 4 feet bgs. An additional 2 yards of material was removed from the new release area. Five 5-point composite soil samples (SS03-SS07) were collected from the sidewalls and base of the historical release area. One 5-point composite soil sample (SS08) was collected from the new release area. It was determined that the east sidewall, south sidewall, and new release area indicated TPH levels in exceedance of the JAN-EPO total TPH limit at concentrations of 450 mg/kg, 15,839 mg/kg, and 179 mg/kg respectively. Following the sampling event, the entire south sidewall of the excavation was treated with 20 gallons of Micro-Blaze® Emergency Liquid Spill Control (Micro-Blaze®). The Micro-Blaze® solution was applied at a minimum concentration of 10 percent (%) (10 parts Micro-Blaze® to 90 parts water). The north sidewall, west sidewall, and base of the excavation area were below the JAN-EPO limit for total TPH and non-detect for BTEX.

On December 23, 2024, approximately 40 yards of additional material was removed from the eastern portion of the historical release excavation. An additional 4 yards of material was removed from the new release excavation. Two 5-point composite samples (SS09/SS11) were collected from the east sidewall and south sidewall of the historical release excavation. One 5-point composite sample (SS10) was collected from the new release excavation. All samples collected were below the JAN-EPO limit for total TPH and non-detect for BTEX. The south sidewall of the excavation was treated with an additional 15 gallons of Micro-Blaze® and the entire new release excavation was treated with 5 gallons of Micro-Blaze®. The Micro-Blaze® solution was applied at a minimum concentration of 10%.

All impacted soils excavated during remedial efforts in November and December 2024 were removed from the site and disposed of at the Envirotech Landfarm (New Mexico Permit – NM01-0011) located south of Bloomfield, New Mexico.

On December 26, 2024, the JAN-EPO approved BMG to backfill the excavation with clean soils. On December 27, 2024 and January 6, 2025, BMG backfilled the historical release and new release excavations with clean soils sourced from nearby native soils provided by the JAN-EPO.

A project map with soil sample locations and remedial efforts can be found in Figure 1. Soil sampling results are provided in Table 1, a photographic log of the sampling effort is provided in Attachment 1, and soil sampling laboratory results can be found in Attachment 2.

Final Closure

Following remedial activities, it was determined that impacts have been delineated vertically and horizontally to the north, west, east, eastern portion of the south sidewall and the new release area. Integrity of the existing wellhead would be compromised if further excavation of the south sidewall is conducted. The remaining impacts on the south sidewall have been treated with approximately 35 gallons of Micro-Blaze®. The majority of treatment was focused on the western portion of the south sidewall where the highest TPH concentrations were identified.

Following the site decommissioning and plugging and abandonment (P&A) of the wellhead, additional soil samples will be collected from the area surrounding the P&A wellhead. Additional soil samples will also be collected from any production equipment removed during final closure. All additional soil samples collected will be 5-point composite samples and will be submitted for laboratory analysis of TPH and BTEX. Based on the soil sampling results, additional remediation may be conducted. Any impacted material discovered during final closure would be excavated and disposed of at an approved facility. If it is determined that all soil sampling results during final closure are below the JAN-EPO TPH and BTEX limits, no additional remediation will be conducted.

Once it is determined that all impacts have been successfully removed and/or treated, final reclamation will be conducted. Final reclamation of the site will include, but not be limited to, backfilling of any excavated areas with clean material, regrading of the entire site, seeding of the site with an approved seed mixture and mulching of the site with certified weed free straw.

BMG has backfilled the excavation and will address any remaining impacts identified in the above remedial efforts during the site decommissioning and final closure as stated above. Should you have any questions regarding the remediation conducted and the final closure plan, please do not hesitate to contact me at 970-764-7356 or ksiesser@cottonwoodconsulting.com.

Sincerely,

Kyle D. Siesser

Kyle Siesser, P.G.
Cottonwood Consulting, LLC

Attachments: Table 1 – Soil Sampling Results
Figure 1 – Project Map
Attachment 1 – Photo Log
Attachment 2 – Soil Sampling Laboratory Results

Table 1

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Table 1
Soil Sampling Results
EPCMU #012
Benson-Montin-Greer Drilling Corporation

Parameter	SS01 11/26/2024	SS02 11/26/2024	SS03 12/18/2024	SS04 12/18/2024	Units
Sample Location	Flowpath	Wellhead Excavation	West Sidewall	East Sidewall	NA
Laboratory ID	E411291-01	E411291-02	E412142-01	E412142-02	NA
Depth	6-8	30	36	30	inches bgs
PID	25.0	156.4	0.4	0.1	ppm
TPH (GRO)	<20.0	<20.0	<20.0	<20.0	mg/kg
TPH (DRO)	1,040	1,180	25.5	140	mg/kg
TPH (EXT DRO)	946	954	65.9	310	mg/kg
Total TPH	1,986	2,134	91.4	450	mg/kg
Benzene	<0.0250	<0.0250	<0.0250	<0.0250	mg/kg
Toluene	0.0421	0.0593	<0.0250	<0.0250	mg/kg
Ethylbenzene	0.0493	0.0800	<0.0250	<0.0250	mg/kg
Total Xylenes	0.293	0.479	<0.0250	<0.0250	mg/kg

Notes:
bgs - below ground surface
PID - Photoionization Detector
TPH - Total Petroleum Hydrocarbons
GRO - Gasoline Range Organics
DRO - Diesel Range Organics
EXT - Extended
mg/kg - milligrams per kilogram
NA - Not Applicable
ppm - parts per million
TPH values detected below the reporting limit are not included in Total TPH calculations

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Table 1 continued
Soil Sampling Results
EPCMU #012
Benson-Montin-Greer Drilling Corporation

Parameter	SS05 12/18/2024	SS06 12/18/2024	SS07 12/18/2024	SS08 12/18/2024	Units
Sample Location	North Sidewall	Base	South Sidewall	New Release Excavation	NA
Laboratory ID	E412142-03	E412142-04	E412142-05	E412142-06	NA
Depth	30	48	30	12	inches bgs
PID	0.2	1.5	267.6	0.1	ppm
TPH (GRO)	<20.0	<20.0	129	<20.0	mg/kg
TPH (DRO)	<25.0	<25.0	9,800	<50.0	mg/kg
TPH (EXT DRO)	<50.0	<50.0	5,910	179	mg/kg
Total TPH	<95.0	<95.0	15,839	179	mg/kg
Benzene	<0.0250	<0.0250	0.0670	<0.0250	mg/kg
Toluene	<0.0250	<0.0250	0.430	<0.0250	mg/kg
Ethylbenzene	<0.0250	<0.0250	1.34	<0.0250	mg/kg
Total Xylenes	<0.0250	<0.0250	6.98	<0.0250	mg/kg

Notes:
bgs - below ground surface
PID - Photoionization Detector
TPH - Total Petroleum Hydrocarbons
GRO - Gasoline Range Organics
DRO - Diesel Range Organics
EXT - Extended
mg/kg - milligrams per kilogram
NA - Not Applicable
ppm - parts per million
TPH values detected below the reporting limit are not included in Total TPH calculations

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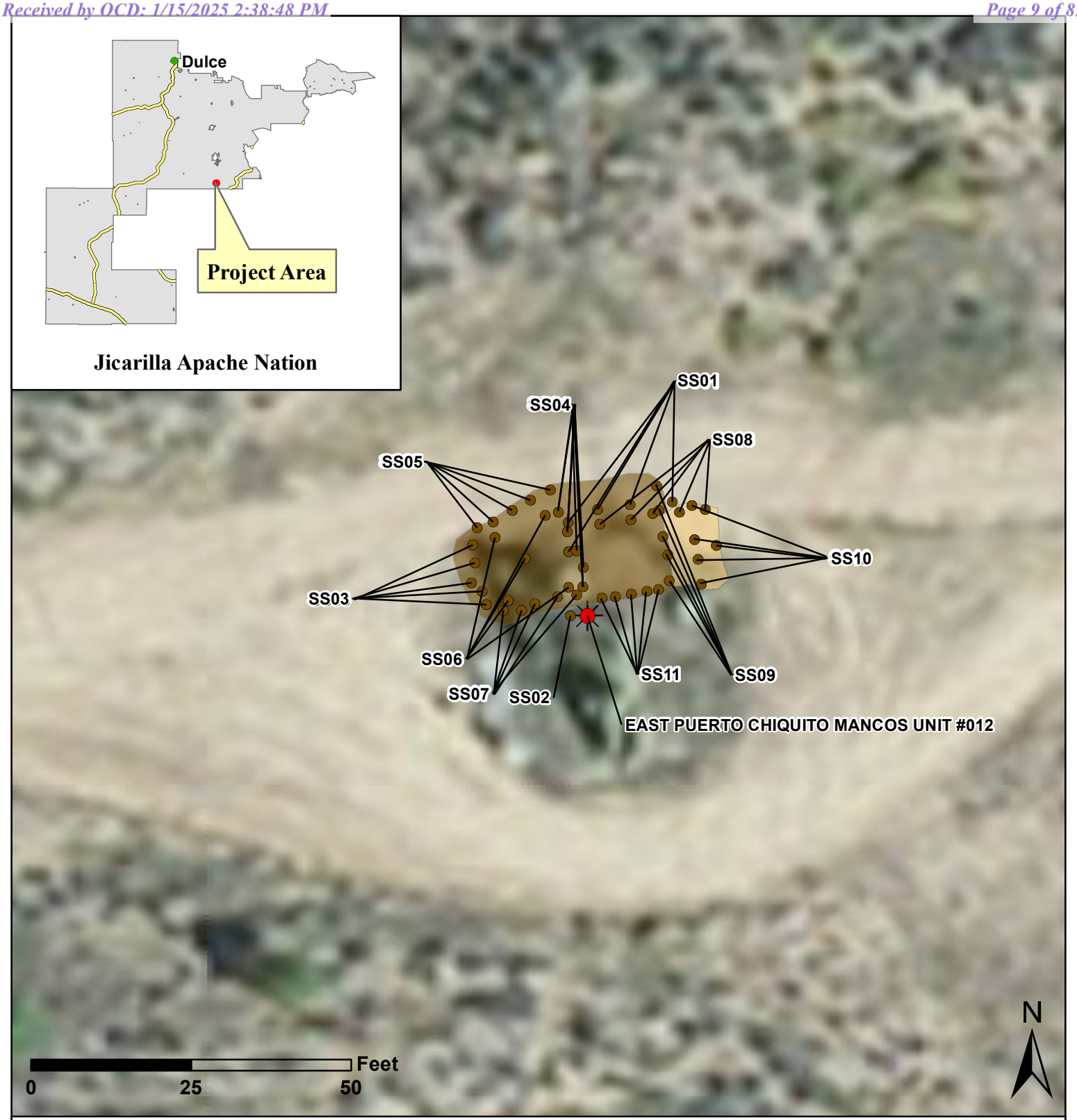
Table 1 continued
Soil Sampling Results
EPCMU #012
Benson-Montin-Greer Drilling Corporation

Parameter	SS09	SS10	SS11	Units
	12/23/2024	12/23/2024	12/23/2024	
Sample Location	East Sidewall	New Release Excavation	South Sidewall	NA
Laboratory ID	E412191-01	E412191-02	E412191-03	NA
Depth	54	18	36	inches bgs
PID	0.1	0.1	0.7	ppm
TPH (GRO)	<20.0	<20.0	<20.0	mg/kg
TPH (DRO)	<25.0	<25.0	<25.0	mg/kg
TPH (EXT DRO)	<50.0	60.9	64.4	mg/kg
Total TPH	<95.0	60.9	64.4	mg/kg
Benzene	<0.0250	<0.0250	<0.0250	mg/kg
Toluene	<0.0250	<0.0250	<0.0250	mg/kg
Ethylbenzene	<0.0250	<0.0250	<0.0250	mg/kg
Total Xylenes	<0.0250	<0.0250	<0.0250	mg/kg

Notes:
bgs - below ground surface
PID - Photoionization Detector
TPH - Total Petroleum Hydrocarbons
GRO - Gasoline Range Organics
DRO - Diesel Range Organics
EXT - Extended
mg/kg - milligrams per kilogram
NA - Not Applicable
ppm - parts per million
TPH values detected below the reporting limit are not included in Total TPH calculations

Figure 1



Notes: SS01 and SS02 collected 11/26/2024. SS02, SS03, SS04, SS05, SS06, SS07, and SS08 collected 12/18/2024. SS09, SS10, and SS11 collected 12/23/2024. SS02 is a discrete sample. All other samples are 5-point composite samples.

Legend

- Soil Sample
- New Release Excavation (12/23/2024)
- Historical Excavation (12/23/2024)
- Oil & Gas Wells

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Mapping by: K. O'Brien, 12/26/2024
Coordinate System:
NAD 1983 UTM Zone 13 N

Location: Sec 19 T27N R1E NMPM

EPCMU #012
Project Map
Benson-Montin-Greer Drilling Corporation

Attachment 1

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EPCMU #012
Photographic Log
Besnon-Montin-Greer Drilling Corporation

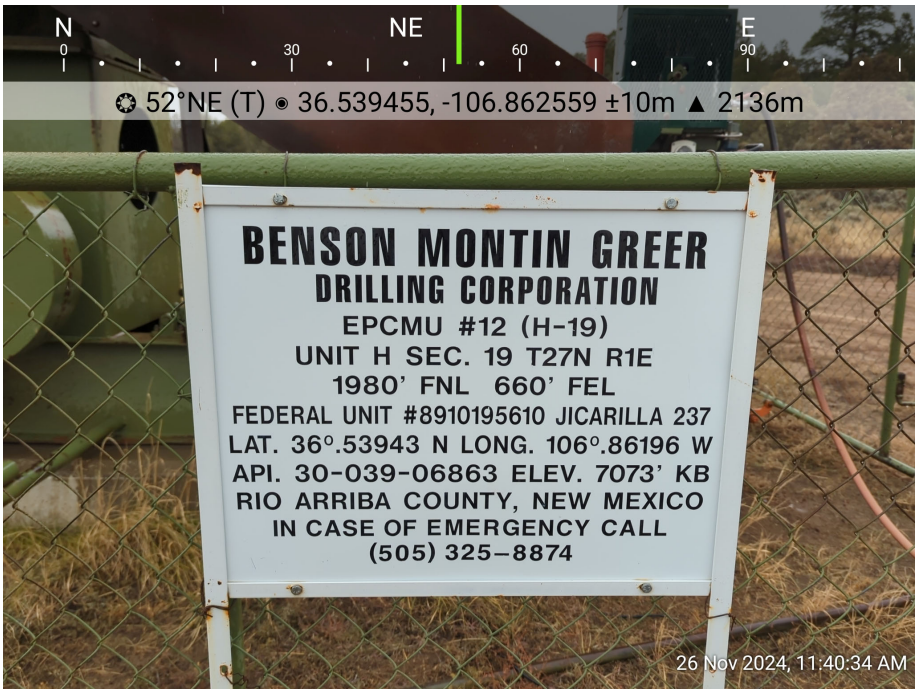

Photo 1: EPCMU #012 well sign.

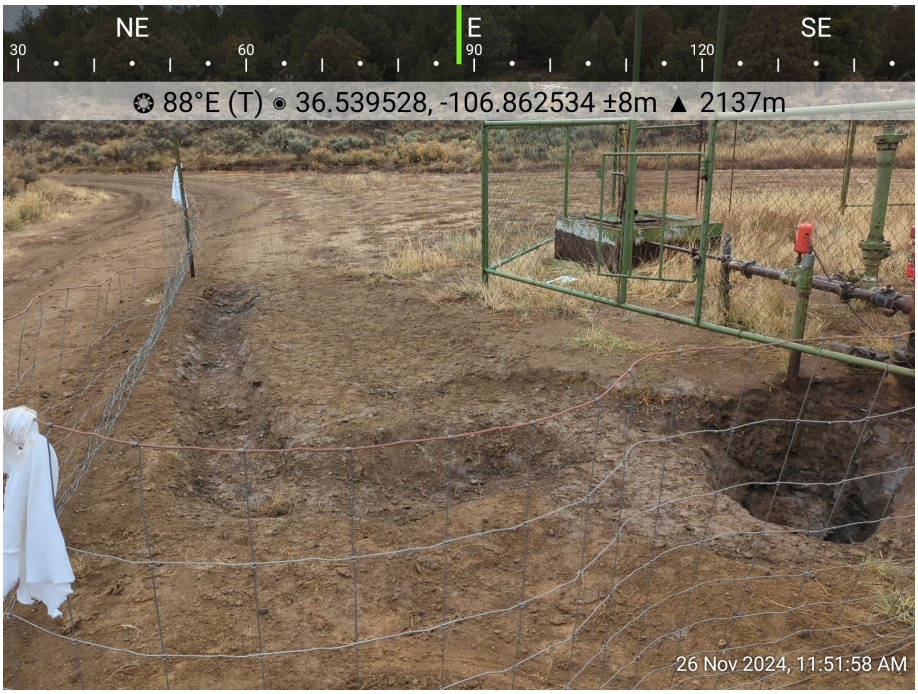

Photo 2: Overall release area and flowpath.

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EPCMU #012
Photographic Log
Besnon-Montin-Greer Drilling Corporation

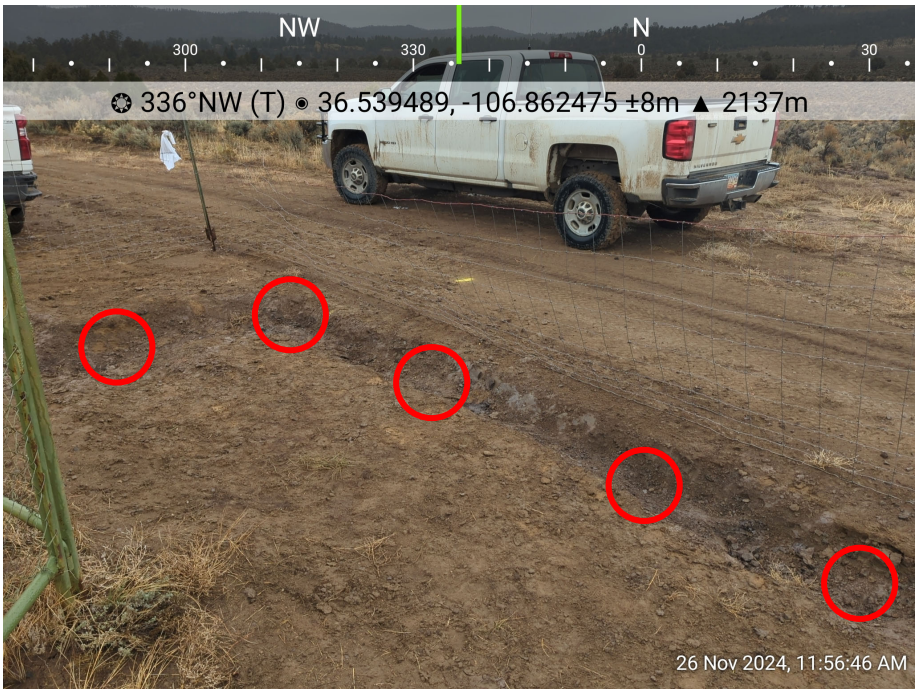

Photo 3: SS01 collected as a 5-point composite sample from the release area and flowpath.

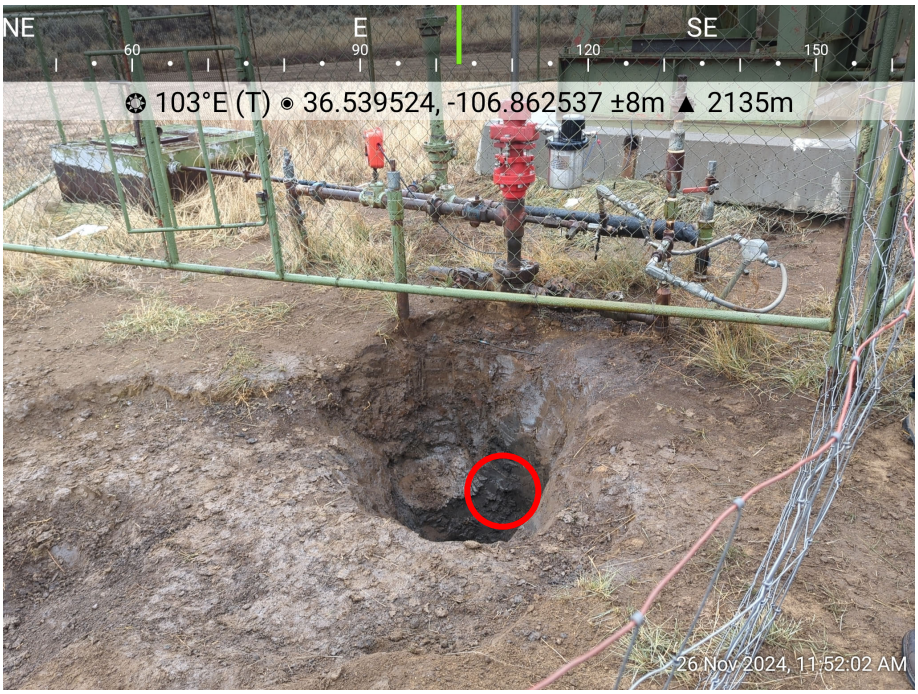

Photo 4: SS02 collected as a discrete sample from within the wellhead excavation.

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EPCMU #012
Photographic Log
Besnon-Montin-Greer Drilling Corporation

Photo 5: Wellhead excavation and new release excavation.

Photo 6: SS03 collected as a 5-point composite sample from the west sidewall of wellhead excavation area.

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Besnon-Montin-Greer Drilling Corporation

Photo 7: SS04 collected as a 5-point composite sample from east sidewall of wellhead excavation area.

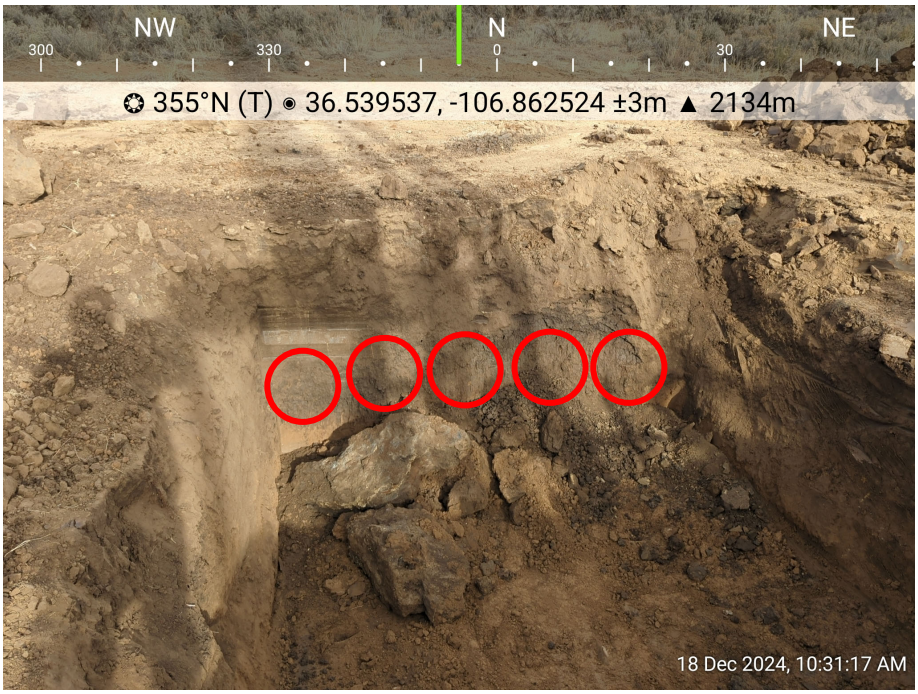

Photo 8: SS05 collected as a 5-point composite sample from the north sidewall of wellhead excavation area.

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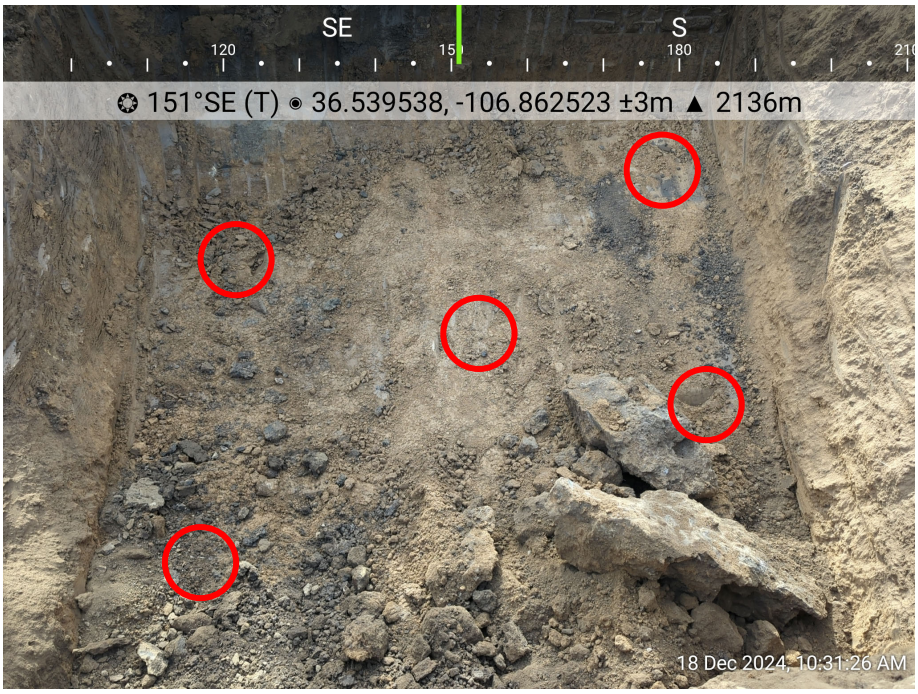

Photo 9: SS06 collected as a 5-point composite sample from the base of wellhead excavation area.

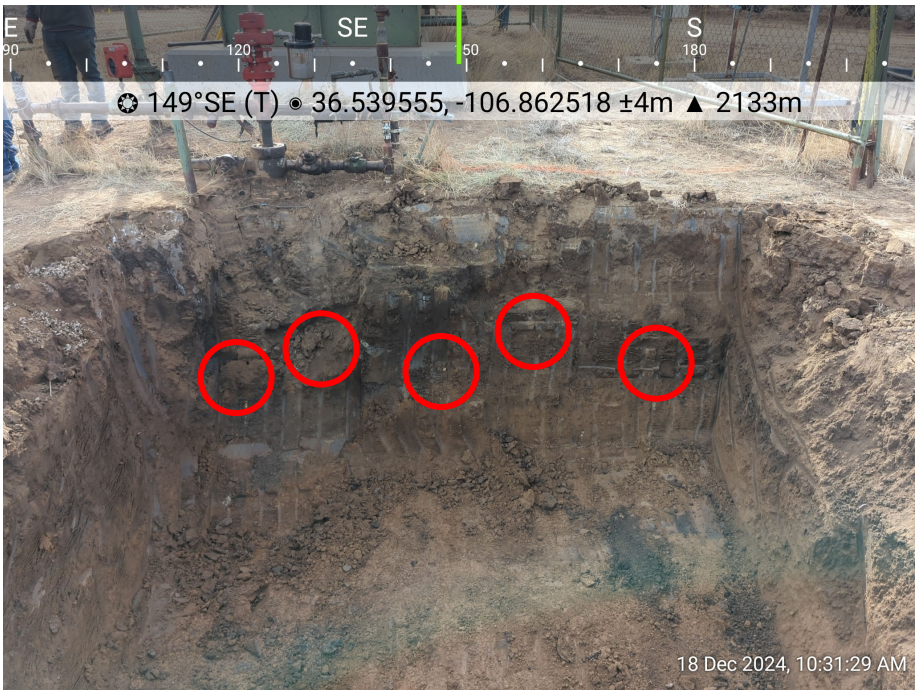

Photo 10: SS07 collected as a 5-point composite sample from south sidewall of excavation area.

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EPCMU #012
Photographic Log
Besnon-Montin-Greer Drilling Corporation

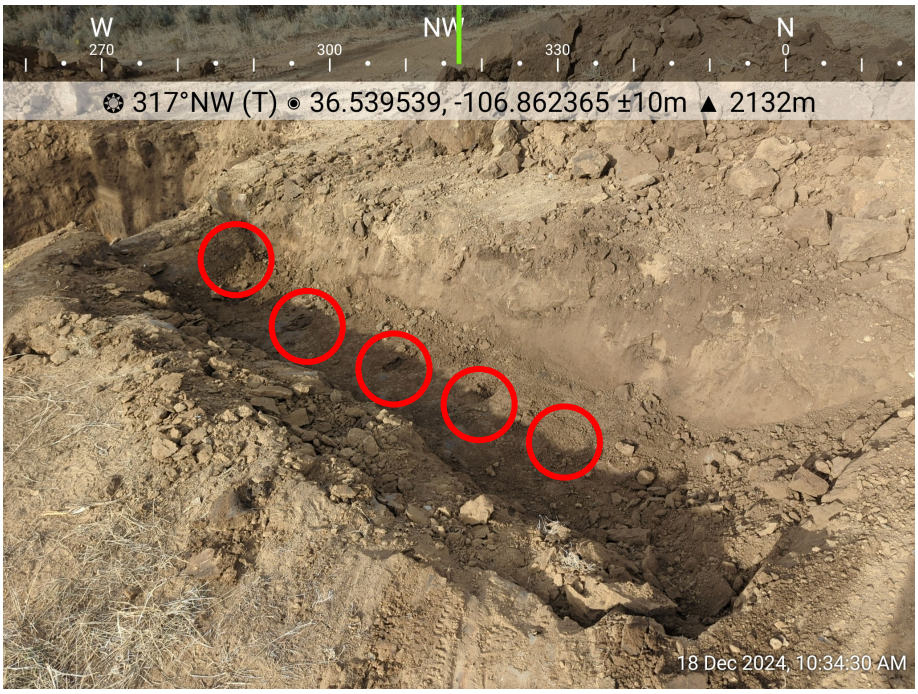

Photo 11: SS08 collected as a 5-point composite sample from new release excavation area.

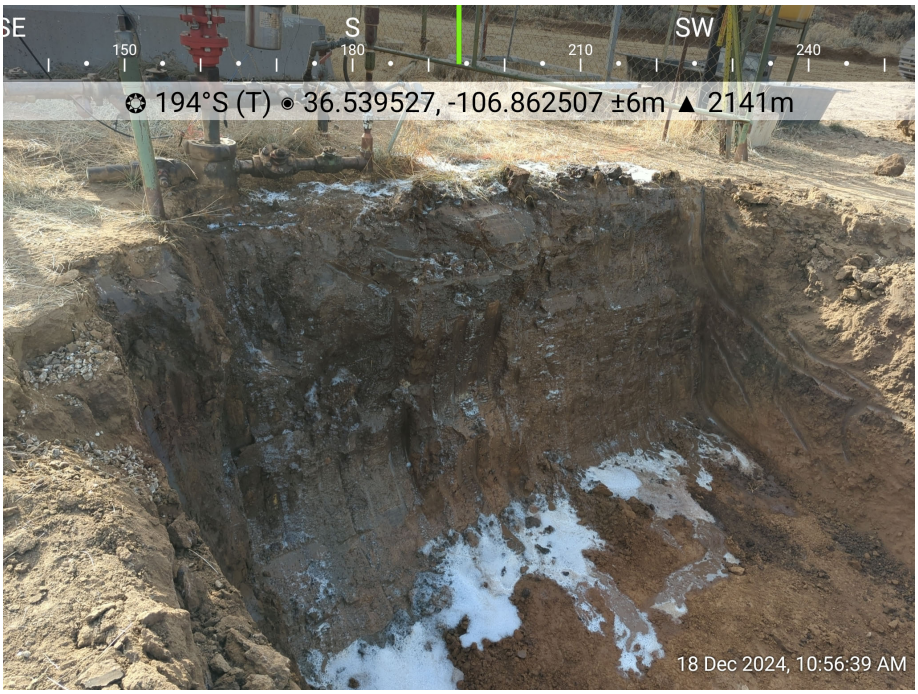

Photo 12: South sidewall following Micro-blaze treatment.

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EPCMU #012
Photographic Log
Besnon-Montin-Greer Drilling Corporation

Photo 13: SS09 collected as a 5-point composite from east sidewall of wellhead excavation area 12/23/2024.

Photo 14: SS10 (red) collected as a 5-point composite from new release excavation area and SS11 (yellow) collected as a 5-point composite from south sidewall of wellhead excavation area, 12/23/2024.

EPCMU #012
Photographic Log
Besnon-Montin-Greer Drilling Corporation

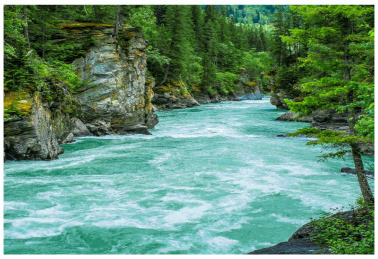
Photo 15: Excavated areas have been backfilled with clean material, 1/6/2025.

Photo 16: Excavated areas have been backfilled with clean material, 1/6/2025.

Attachment 2

Report to:

Kyle Siesser



5796 U.S. Hwy 64
Farmington, NM 87401

Phone: (505) 632-1881
Envirotech-inc.com

envirotech

Practical Solutions for a Better Tomorrow

Analytical Report

Cottonwood Consulting

Project Name: EPCMU #12 (H-19)

Work Order: E411291

Job Number: 20035-C-0001

Received: 11/26/2024

Revision: 3

Report Reviewed By:

Walter Hinchman
Laboratory Director
12/6/24

Envirotech Inc. certifies the test results meet all requirements of TNI unless noted otherwise.
Statement of Data Authenticity: Envirotech Inc, attests the data reported has not been altered in any way.
Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech Inc.
Envirotech Inc, holds the Utah TNI certification NM00979 for data reported.
Envirotech Inc, holds the Texas TNI certification T104704557 for data reported.

Date Reported: 12/6/24

Kyle Siesser
PO Box 1653
Durango, CO 81302

Project Name: EPCMU #12 (H-19)
Workorder: E411291
Date Received: 11/26/2024 2:42:00PM

Kyle Siesser,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 11/26/2024 2:42:00PM, under the Project Name: EPCMU #12 (H-19).

The analytical test results summarized in this report with the Project Name: EPCMU #12 (H-19) apply to the individual samples collected, identified and submitted bearing the project name on the enclosed chain-of-custody. Subcontracted sample analyses not conducted by Envirotech, Inc., are attached in full as issued by the subcontract laboratory.

Please review the Chain-of-Custody (COC) and Sample Receipt Checklist (SRC) for any issues reguarding sample receipt temperature, containers, preservation etc. To best understand your test results, review the entire report summarizing your sample data and the associated quality control batch data.

All reported data in this analytical report were analyzed according to the referenced method(s) and are in compliance with the latest NELAC/TNI standards, unless otherwise noted. Samples or analytical quality control parameters not meeting specific QC criteria are qualified with a data flag. Data flag definitions are located in the Notes and Definitions section of this analytical report.

If you have any questions concerning this report, please feel free to contact Envirotech, Inc.

Respectfully,

Walter Hinchman
Laboratory Director
Office: 505-632-1881
Cell: 775-287-1762
whinchman@envirotech-inc.com

Raina Schwanz
Laboratory Administrator
Office: 505-632-1881
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ljarboe@envirotech-inc.com

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Cell: 505-947-8222
mgonzales@envirotech-inc.com

Envirotech Web Address: www.envirotech-inc.com

Table of Contents

Sample Summary

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	**Reported:**
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	12/06/24 11:25

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
SS01	E411291-01A	Soil	11/26/24	11/26/24	Glass Jar, 4 oz.
	E411291-01B	Soil	11/26/24	11/26/24	Glass Jar, 4 oz.
SS02	E411291-02A	Soil	11/26/24	11/26/24	Glass Jar, 4 oz.
	E411291-02B	Soil	11/26/24	11/26/24	Glass Jar, 4 oz.

Case Narative:

Project Name: EPCMU #12 (H-19)
Workorder:E411291
Date Received: 11/26/24 14:42

The client requested the following sample(s) to be re-extracted and re-analyzed:

Sample Name	Laboratory ID	Analysis
SS01	E411291-01	DRO/ORO 8015

The analytical test results summarized in this revised report represent this re-extration and re-analysis.

If you have any questions reguarding this report please feel free to contact Envirotech Inc.

Respectfully,

Walter Hinchman

Sample Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	
PO Box 1653	Project Number:	20035-C-0001	**Reported:**
Durango CO, 81302	Project Manager:	Kyle Siesser	12/6/2024 11:25:14AM

SS01

E411291-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analyst: SL			Batch: 2448070
Benzene	ND	0.0250	1	11/27/24	11/28/24	
Ethylbenzene	**0.0493**	0.0250	1	11/27/24	11/28/24	
Toluene	**0.0421**	0.0250	1	11/27/24	11/28/24	
o-Xylene	**0.0979**	0.0250	1	11/27/24	11/28/24	
p,m-Xylene	**0.195**	0.0500	1	11/27/24	11/28/24	
Total Xylenes	**0.293**	0.0250	1	11/27/24	11/28/24	
Surrogate: 4-Bromochlorobenzene-PID		*85.8 %*	*70-130*	*11/27/24*	*11/28/24*	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: SL			Batch: 2448070
Gasoline Range Organics (C6-C10)	ND	20.0	1	11/27/24	11/28/24	
Surrogate: 1-Chloro-4-fluorobenzene-FID		*95.7 %*	*70-130*	*11/27/24*	*11/28/24*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: NV			Batch: 2449058
Diesel Range Organics (C10-C28)	**1040**	25.0	1	12/04/24	12/04/24	
Oil Range Organics (C28-C36)	**946**	50.0	1	12/04/24	12/04/24	
Surrogate: n-Nonane		*130 %*	*50-200*	*12/04/24*	*12/04/24*	

Sample Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	
PO Box 1653	Project Number:	20035-C-0001	**Reported:**
Durango CO, 81302	Project Manager:	Kyle Siesser	12/6/2024 11:25:14AM

SS02

E411291-02

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analyst: SL			Batch: 2448070
Benzene	ND	0.0250	1	11/27/24	11/28/24	
Ethylbenzene	**0.0800**	0.0250	1	11/27/24	11/28/24	
Toluene	**0.0593**	0.0250	1	11/27/24	11/28/24	
o-Xylene	**0.146**	0.0250	1	11/27/24	11/28/24	
p,m-Xylene	**0.333**	0.0500	1	11/27/24	11/28/24	
Total Xylenes	**0.479**	0.0250	1	11/27/24	11/28/24	
Surrogate: 4-Bromochlorobenzene-PID		*85.9 %*	*70-130*	*11/27/24*	*11/28/24*	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: SL			Batch: 2448070
Gasoline Range Organics (C6-C10)	ND	20.0	1	11/27/24	11/28/24	
Surrogate: 1-Chloro-4-fluorobenzene-FID		*94.8 %*	*70-130*	*11/27/24*	*11/28/24*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: AF			Batch: 2448064
Diesel Range Organics (C10-C28)	**1180**	25.0	1	11/27/24	11/28/24	
Oil Range Organics (C28-C36)	**954**	50.0	1	11/27/24	11/28/24	
Surrogate: n-Nonane		*100 %*	*50-200*	*11/27/24*	*11/28/24*	

QC Summary Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	**Reported:**
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	12/6/2024 11:25:14AM

Volatile Organics by EPA 8021B

Analyst: BA

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2448070-BLK1)									Prepared: 11/27/24 Analyzed: 11/27/24
Benzene	ND	0.0250							
Ethylbenzene	ND	0.0250							
Toluene	ND	0.0250							
o-Xylene	ND	0.0250							
p,m-Xylene	ND	0.0500							
Total Xylenes	ND	0.0250							
Surrogate: 4-Bromochlorobenzene-PID	*6.90*		*8.00*		*86.3*	*70-130*			
LCS (2448070-BS1)									Prepared: 11/27/24 Analyzed: 11/27/24
Benzene	5.06	0.0250	5.00		101	70-130			
Ethylbenzene	4.83	0.0250	5.00		96.7	70-130			
Toluene	4.96	0.0250	5.00		99.2	70-130			
o-Xylene	4.82	0.0250	5.00		96.5	70-130			
p,m-Xylene	9.80	0.0500	10.0		98.0	70-130			
Total Xylenes	14.6	0.0250	15.0		97.5	70-130			
Surrogate: 4-Bromochlorobenzene-PID	*6.99*		*8.00*		*87.3*	*70-130*			
LCS Dup (2448070-BSD1)									Prepared: 11/27/24 Analyzed: 11/27/24
Benzene	5.27	0.0250	5.00		105	70-130	4.05	20	
Ethylbenzene	5.04	0.0250	5.00		101	70-130	4.24	20	
Toluene	5.17	0.0250	5.00		103	70-130	4.19	20	
o-Xylene	5.03	0.0250	5.00		101	70-130	4.21	20	
p,m-Xylene	10.2	0.0500	10.0		102	70-130	4.18	20	
Total Xylenes	15.3	0.0250	15.0		102	70-130	4.19	20	
Surrogate: 4-Bromochlorobenzene-PID	*6.89*		*8.00*		*86.2*	*70-130*			

QC Summary Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	**Reported:**
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	12/6/2024 11:25:14AM

Nonhalogenated Organics by EPA 8015D - GRO

Analyst: BA

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2448070-BLK1)									Prepared: 11/27/24 Analyzed: 11/27/24
Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	*7.56*		*8.00*		*94.6*	*70-130*			
LCS (2448070-BS2)									Prepared: 11/27/24 Analyzed: 11/28/24
Gasoline Range Organics (C6-C10)	43.1	20.0	50.0		86.1	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	*7.77*		*8.00*		*97.1*	*70-130*			
LCS Dup (2448070-BSD2)									Prepared: 11/27/24 Analyzed: 11/28/24
Gasoline Range Organics (C6-C10)	43.2	20.0	50.0		86.4	70-130	0.326	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	*7.65*		*8.00*		*95.6*	*70-130*			

QC Summary Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	**Reported:**
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	12/6/2024 11:25:14AM

Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: AF

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2448064-BLK1)									Prepared: 11/27/24 Analyzed: 11/27/24
Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: n-Nonane	*52.2*		*50.0*		*104*	*50-200*			
LCS (2448064-BS1)									Prepared: 11/27/24 Analyzed: 11/27/24
Diesel Range Organics (C10-C28)	264	25.0	250		105	38-132			
Surrogate: n-Nonane	*49.1*		*50.0*		*98.2*	*50-200*			
LCS Dup (2448064-BSD1)									Prepared: 11/27/24 Analyzed: 11/27/24
Diesel Range Organics (C10-C28)	270	25.0	250		108	38-132	2.27	20	
Surrogate: n-Nonane	*47.8*		*50.0*		*95.6*	*50-200*			

QC Summary Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	**Reported:**
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	12/6/2024 11:25:14AM

Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: NV

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2449058-BLK1)									Prepared: 12/04/24 Analyzed: 12/05/24
Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: n-Nonane	*48.2*		*50.0*		*96.3*	*50-200*			
LCS (2449058-BS1)									Prepared: 12/04/24 Analyzed: 12/04/24
Diesel Range Organics (C10-C28)	252	25.0	250		101	38-132			
Surrogate: n-Nonane	*89.3*		*50.0*		*179*	*50-200*			
LCS Dup (2449058-BSD1)									Prepared: 12/04/24 Analyzed: 12/04/24
Diesel Range Organics (C10-C28)	247	25.0	250		98.9	38-132	1.68	20	
Surrogate: n-Nonane	*61.7*		*50.0*		*123*	*50-200*			

QC Summary Report Comment:
Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures. Therefore, hand calculated values may differ slightly.

Definitions and Notes

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	
PO Box 1653	Project Number:	20035-C-0001	**Reported:**
Durango CO, 81302	Project Manager:	Kyle Siesser	12/06/24 11:25

ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
RPD	Relative Percent Difference
DNI	Did Not Ignite
DNR	Did not react with the addition of acid or base.

Note (1): Methods marked with ** are non-accredited methods.

Note (2): Soil data is reported on an "as received" weight basis, unless reported otherwise.

Chain of Custody

Client Information	Invoice Information	Lab Use Only	TAT	State
Client: Cottonwood Consulting	Company:	Lab WO# E411291	1D 2D 3D Std	NM CO UT TX
Project Name: EPCMC #12 (H-19)	Address:	Job Number 20035.C.001		X
Project Manager: Kyle Siesser	City, State, Zip:		X	
Address: Po Box 1653	Phone:			
City, State, Zip: Durango, Co 81302	Email:			
Phone: 970 764 7356	Miscellaneous:			
Email: KSiesser@cottonwoodconsulting.com				

Sample Information

Time Sampled	Date Sampled	Matrix	No. of Containers	Sample ID	Field Filter	Lab Number	DRO/ORO by 8015	GRO/DRO by 8015	BTEX by 8021	VOC by 8260	Chloride 300.0	BGDOC - NM	TCEQ 1005 - TX	RCRA 8 Metals	Cation/Anion Pkg			Remarks
1125	11-26-24	Soil	2	SS01		1	X	X	X									
1135	11-26-24	Soil	2	SS02		2	X	X	X									

Analysis and Method

EPA Program

SDWA	CWA	RCRA

Compliance Y or N

PWSID #

Additional Instructions:

I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabeling the sample location, date or time of collection is considered fraud and may be grounds for legal action.

Sampled by: Joseph Enfactnre

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
	11.26.24	1442		11.26.24	14:42
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time

Samples requiring thermal preservation must be received on ice the day they are sampled or received packed in ice at an avg temp above 0 but less than 6 °C on subsequent days.

Lab Use Only

Received on ice: (Y) N

T1 T2 T3

AVG Temp °C 4

Sample Matrix: S - Soil, Sd - Solid, Sg - Sludge, A - Aqueous, O - Other

Container Type: g - glass, p - poly/plastic, ag - amber glass, v - VOA

Note: Samples are discarded 14 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.

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Envirotech Analytical Laboratory

Printed: 11/27/2024 9:22:20AM

Sample Receipt Checklist (SRC)

Instructions: Please take note of any NO checkmarks.
If we receive no response concerning these items within 24 hours of the date of this notice, all the samples will be analyzed as requested.

Client:	Cottonwood Consulting	Date Received:	11/26/24 14:42	Work Order ID:	E411291
Phone:	970-764-7356	Date Logged In:	11/27/24 09:18	Logged In By:	Caitlin Mars
Email:	ksiesser@cottonwoodconsulting.com	Due Date:	12/03/24 17:00 (3 day TAT)		

Chain of Custody (COC)

1. Does the sample ID match the COC?	Yes	
2. Does the number of samples per sampling site location match the COC	Yes	
3. Were samples dropped off by client or carrier?	Yes	Carrier: Joseph LaFortune
4. Was the COC complete, i.e., signatures, dates/times, requested analyses?	Yes	
5. Were all samples received within holding time? Note: Analysis, such as pH which should be conducted in the field, i.e, 15 minute hold time, are not included in this disucssion.	Yes	

Comments/Resolution

Sample Turn Around Time (TAT)

6. Did the COC indicate standard TAT, or Expedited TAT?	Yes

Sample Cooler

7. Was a sample cooler received?	Yes
8. If yes, was cooler received in good condition?	Yes
9. Was the sample(s) received intact, i.e., not broken?	Yes
10. Were custody/security seals present?	No
11. If yes, were custody/security seals intact?	NA
12. Was the sample received on ice? If yes, the recorded temp is 4°C, i.e., 6°±2°C Note: Thermal preservation is not required, if samples are received w/i 15 minutes of sampling	Yes
13. If no visible ice, record the temperature. Actual sample temperature: 4°C	

Sample Container

14. Are aqueous VOC samples present?	No
15. Are VOC samples collected in VOA Vials?	NA
16. Is the head space less than 6-8 mm (pea sized or less)?	NA
17. Was a trip blank (TB) included for VOC analyses?	NA
18. Are non-VOC samples collected in the correct containers?	Yes
19. Is the appropriate volume/weight or number of sample containers collected?	Yes

Field Label

20. Were field sample labels filled out with the minimum information:	
Sample ID?	Yes
Date/Time Collected?	Yes
Collectors name?	Yes

Sample Preservation

21. Does the COC or field labels indicate the samples were preserved?	No
22. Are sample(s) correctly preserved?	NA
24. Is lab filteration required and/or requested for dissolved metals?	No

Multiphase Sample Matrix

26. Does the sample have more than one phase, i.e., multiphase?	No
27. If yes, does the COC specify which phase(s) is to be analyzed?	NA

Subcontract Laboratory

28. Are samples required to get sent to a subcontract laboratory?	No	
29. Was a subcontract laboratory specified by the client and if so who?	NA	Subcontract Lab: NA

Client Instruction

Signature of client authorizing changes to the COC or sample disposition.

Date

envirotech Inc.

Chain of Custody

Client Information	Invoice Information	Lab Use Only	TAT	State
Client: Cottonwood Consulting	Company:	Lab WO# E411291	Job Number 20035-C.001	1D 2D 3D Std: 3D X
Project Name: EPCM #12 (H-19)	Address:			NM X CO UT TX
Project Manager: Kyle Siesser	City, State, Zip:			
Address: Po Box 1653	Phone:			
City, State, Zip: Durango, Co 81302	Email:			
Phone: 970 764 7356	Miscellaneous:			
Email: KSiesser@cottonwoodconsulting.com				

Sample Information

Time Sampled	Date Sampled	Matrix	No. of Containers	Sample ID	Field Filter	Lab Number	DRO/ORO by 8015	GRO/DRO by 8015	BTEX by 8021	VOC by 8260	Chloride 300.0	BGDOC - NM	TCEQ 1005 - TX	RCRA 8 Metals	Cation/Anion Pkg			Remarks
1125	11-26-24	Soil	2	SS01		1	X	X	X									Client asked to re extract rerun sample #1 for DRO/ORO 12/3/24 cm
1135	11-26-24	Soil	2	SS02		2	X	X	X									

Analysis and Method

EPA Program

SDWA	CWA	RCRA

Compliance Y or N

PWSID #

Additional Instructions:

I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabeling the sample location, date or time of collection is considered fraud and may be grounds for legal action.

Sampled by: Joseph Cartmore

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
	11-26-24	1442		11.26.24	14:42
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time

Samples requiring thermal preservation must be received on ice the day they are sampled or received packed in ice at an avg temp above 0 but less than 6 °C on

Lab Use Only

Received on ice: (Y) N

T1 T2 T3

AVG Temp °C 4

Sample Matrix: S - Soil, Sd - Solid, Sg - Sludge, A - Aqueous, O - Other

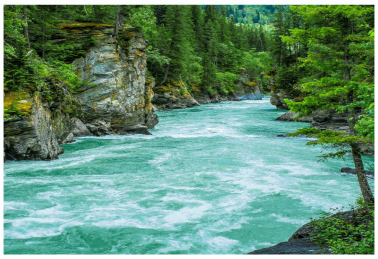
Container Type: g - glass, p - poly/plastic, ag - amber glass, v - VOA

Note: Samples are discarded 14 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.

envirotech

Report to:

Kyle Siesser



5796 U.S. Hwy 64
Farmington, NM 87401

Phone: (505) 632-1881
Envirotech-inc.com

envirotech

Practical Solutions for a Better Tomorrow

Analytical Report

Cottonwood Consulting

Project Name:	EPCMU #12 (H-19)
Work Order:	E412142
Job Number:	20035-C-0001
Received:	12/18/2024

Revision: 1

Report Reviewed By:

Walter Hinchman
Laboratory Director
12/20/24

Envirotech Inc. certifies the test results meet all requirements of TNI unless noted otherwise.
Statement of Data Authenticity: Envirotech Inc, attests the data reported has not been altered in any way.
Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech Inc.
Envirotech Inc, holds the Utah TNI certification NM00979 for data reported.
Envirotech Inc, holds the Texas TNI certification T104704557 for data reported.

Date Reported: 12/20/24

Kyle Siesser
PO Box 1653
Durango, CO 81302

Project Name: EPCMU #12 (H-19)
Workorder: E412142
Date Received: 12/18/2024 1:45:00PM

Kyle Siesser,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 12/18/2024 1:45:00PM, under the Project Name: EPCMU #12 (H-19).

The analytical test results summarized in this report with the Project Name: EPCMU #12 (H-19) apply to the individual samples collected, identified and submitted bearing the project name on the enclosed chain-of-custody. Subcontracted sample analyses not conducted by Envirotech, Inc., are attached in full as issued by the subcontract laboratory.

Please review the Chain-of-Custody (COC) and Sample Receipt Checklist (SRC) for any issues reguarding sample receipt temperature, containers, preservation etc. To best understand your test results, review the entire report summarizing your sample data and the associated quality control batch data.

All reported data in this analytical report were analyzed according to the referenced method(s) and are in compliance with the latest NELAC/TNI standards, unless otherwise noted. Samples or analytical quality control parameters not meeting specific QC criteria are qualified with a data flag. Data flag definitions are located in the Notes and Definitions section of this analytical report.

If you have any questions concerning this report, please feel free to contact Envirotech, Inc.

Respectfully,

Walter Hinchman
Laboratory Director
Office: 505-632-1881
Cell: 775-287-1762
whinchman@envirotech-inc.com

Raina Schwanz
Laboratory Administrator
Office: 505-632-1881
rainaschwanz@envirotech-inc.com

Field Offices:

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ljarboe@envirotech-inc.com

Michelle Gonzales
Client Representative
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Cell: 505-947-8222
mgonzales@envirotech-inc.com

Envirotech Web Address: www.envirotech-inc.com

Table of Contents

Sample Summary

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	**Reported:**
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	12/20/24 11:58

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
SS03	E412142-01A	Soil	12/18/24	12/18/24	Glass Jar, 4 oz.
	E412142-01B	Soil	12/18/24	12/18/24	Glass Jar, 4 oz.
SS04	E412142-02A	Soil	12/18/24	12/18/24	Glass Jar, 4 oz.
	E412142-02B	Soil	12/18/24	12/18/24	Glass Jar, 4 oz.
SS05	E412142-03A	Soil	12/18/24	12/18/24	Glass Jar, 4 oz.
	E412142-03B	Soil	12/18/24	12/18/24	Glass Jar, 4 oz.
SS06	E412142-04A	Soil	12/18/24	12/18/24	Glass Jar, 4 oz.
	E412142-04B	Soil	12/18/24	12/18/24	Glass Jar, 4 oz.
SS07	E412142-05A	Soil	12/18/24	12/18/24	Glass Jar, 4 oz.
	E412142-05B	Soil	12/18/24	12/18/24	Glass Jar, 4 oz.
SS08	E412142-06A	Soil	12/18/24	12/18/24	Glass Jar, 4 oz.
	E412142-06B	Soil	12/18/24	12/18/24	Glass Jar, 4 oz.

Sample Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	
PO Box 1653	Project Number:	20035-C-0001	**Reported:**
Durango CO, 81302	Project Manager:	Kyle Siesser	12/20/2024 11:58:28AM

SS03

E412142-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analyst: SL			Batch: 2451058
Benzene	ND	0.0250	1	12/18/24	12/19/24	
Ethylbenzene	ND	0.0250	1	12/18/24	12/19/24	
Toluene	ND	0.0250	1	12/18/24	12/19/24	
o-Xylene	ND	0.0250	1	12/18/24	12/19/24	
p,m-Xylene	ND	0.0500	1	12/18/24	12/19/24	
Total Xylenes	ND	0.0250	1	12/18/24	12/19/24	
Surrogate: 4-Bromochlorobenzene-PID		*88.6 %*	*70-130*	*12/18/24*	*12/19/24*	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: SL			Batch: 2451058
Gasoline Range Organics (C6-C10)	ND	20.0	1	12/18/24	12/19/24	
Surrogate: 1-Chloro-4-fluorobenzene-FID		*92.2 %*	*70-130*	*12/18/24*	*12/19/24*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: NV			Batch: 2451063
Diesel Range Organics (C10-C28)	**25.5**	25.0	1	12/18/24	12/18/24	
Oil Range Organics (C28-C36)	**65.9**	50.0	1	12/18/24	12/18/24	
Surrogate: n-Nonane		*111 %*	*50-200*	*12/18/24*	*12/18/24*	

Sample Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	
PO Box 1653	Project Number:	20035-C-0001	**Reported:**
Durango CO, 81302	Project Manager:	Kyle Siesser	12/20/2024 11:58:28AM

SS04

E412142-02

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analyst: SL			Batch: 2451058
Benzene	ND	0.0250	1	12/18/24	12/19/24	
Ethylbenzene	ND	0.0250	1	12/18/24	12/19/24	
Toluene	ND	0.0250	1	12/18/24	12/19/24	
o-Xylene	ND	0.0250	1	12/18/24	12/19/24	
p,m-Xylene	ND	0.0500	1	12/18/24	12/19/24	
Total Xylenes	ND	0.0250	1	12/18/24	12/19/24	
Surrogate: 4-Bromochlorobenzene-PID		*88.9 %*	*70-130*	*12/18/24*	*12/19/24*	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: SL			Batch: 2451058
Gasoline Range Organics (C6-C10)	ND	20.0	1	12/18/24	12/19/24	
Surrogate: 1-Chloro-4-fluorobenzene-FID		*91.4 %*	*70-130*	*12/18/24*	*12/19/24*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: NV			Batch: 2451063
Diesel Range Organics (C10-C28)	**140**	25.0	1	12/18/24	12/19/24	
Oil Range Organics (C28-C36)	**310**	50.0	1	12/18/24	12/19/24	
Surrogate: n-Nonane		*109 %*	*50-200*	*12/18/24*	*12/19/24*	

Sample Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	
PO Box 1653	Project Number:	20035-C-0001	**Reported:**
Durango CO, 81302	Project Manager:	Kyle Siesser	12/20/2024 11:58:28AM

SS05

E412142-03

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analyst: SL			Batch: 2451058
Benzene	ND	0.0250	1	12/18/24	12/19/24	
Ethylbenzene	ND	0.0250	1	12/18/24	12/19/24	
Toluene	ND	0.0250	1	12/18/24	12/19/24	
o-Xylene	ND	0.0250	1	12/18/24	12/19/24	
p,m-Xylene	ND	0.0500	1	12/18/24	12/19/24	
Total Xylenes	ND	0.0250	1	12/18/24	12/19/24	
Surrogate: 4-Bromochlorobenzene-PID		*89.6 %*	*70-130*	*12/18/24*	*12/19/24*	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: SL			Batch: 2451058
Gasoline Range Organics (C6-C10)	ND	20.0	1	12/18/24	12/19/24	
Surrogate: 1-Chloro-4-fluorobenzene-FID		*92.7 %*	*70-130*	*12/18/24*	*12/19/24*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: NV			Batch: 2451063
Diesel Range Organics (C10-C28)	ND	25.0	1	12/18/24	12/18/24	
Oil Range Organics (C28-C36)	ND	50.0	1	12/18/24	12/18/24	
Surrogate: n-Nonane		*112 %*	*50-200*	*12/18/24*	*12/18/24*	

Sample Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	
PO Box 1653	Project Number:	20035-C-0001	**Reported:**
Durango CO, 81302	Project Manager:	Kyle Siesser	12/20/2024 11:58:28AM

SS06

E412142-04

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analyst: SL			Batch: 2451058
Benzene	ND	0.0250	1	12/18/24	12/19/24	
Ethylbenzene	ND	0.0250	1	12/18/24	12/19/24	
Toluene	ND	0.0250	1	12/18/24	12/19/24	
o-Xylene	ND	0.0250	1	12/18/24	12/19/24	
p,m-Xylene	ND	0.0500	1	12/18/24	12/19/24	
Total Xylenes	ND	0.0250	1	12/18/24	12/19/24	
Surrogate: 4-Bromochlorobenzene-PID		*90.7 %*	*70-130*	*12/18/24*	*12/19/24*	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: SL			Batch: 2451058
Gasoline Range Organics (C6-C10)	ND	20.0	1	12/18/24	12/19/24	
Surrogate: 1-Chloro-4-fluorobenzene-FID		*93.0 %*	*70-130*	*12/18/24*	*12/19/24*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: NV			Batch: 2451063
Diesel Range Organics (C10-C28)	ND	25.0	1	12/18/24	12/18/24	
Oil Range Organics (C28-C36)	ND	50.0	1	12/18/24	12/18/24	
Surrogate: n-Nonane		*121 %*	*50-200*	*12/18/24*	*12/18/24*	

Sample Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	
PO Box 1653	Project Number:	20035-C-0001	**Reported:**
Durango CO, 81302	Project Manager:	Kyle Siesser	12/20/2024 11:58:28AM

SS07

E412142-05

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analyst: SL			Batch: 2451058
Benzene	**0.0670**	0.0250	1	12/18/24	12/19/24	
Ethylbenzene	**1.34**	0.0250	1	12/18/24	12/19/24	
Toluene	**0.430**	0.0250	1	12/18/24	12/19/24	
o-Xylene	**1.21**	0.0250	1	12/18/24	12/19/24	
p,m-Xylene	**5.77**	0.0500	1	12/18/24	12/19/24	
Total Xylenes	**6.98**	0.0250	1	12/18/24	12/19/24	
Surrogate: 4-Bromochlorobenzene-PID		*109 %*	*70-130*	*12/18/24*	*12/19/24*	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: SL			Batch: 2451058
Gasoline Range Organics (C6-C10)	**129**	20.0	1	12/18/24	12/19/24	
Surrogate: 1-Chloro-4-fluorobenzene-FID		*98.0 %*	*70-130*	*12/18/24*	*12/19/24*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: NV			Batch: 2451063
Diesel Range Organics (C10-C28)	**9800**	500	20	12/18/24	12/18/24	
Oil Range Organics (C28-C36)	**5910**	1000	20	12/18/24	12/18/24	
Surrogate: n-Nonane		*133 %*	*50-200*	*12/18/24*	*12/18/24*	

Sample Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	
PO Box 1653	Project Number:	20035-C-0001	**Reported:**
Durango CO, 81302	Project Manager:	Kyle Siesser	12/20/2024 11:58:28AM

SS08

E412142-06

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analyst: SL			Batch: 2451058
Benzene	ND	0.0250	1	12/18/24	12/19/24	
Ethylbenzene	ND	0.0250	1	12/18/24	12/19/24	
Toluene	ND	0.0250	1	12/18/24	12/19/24	
o-Xylene	ND	0.0250	1	12/18/24	12/19/24	
p,m-Xylene	ND	0.0500	1	12/18/24	12/19/24	
Total Xylenes	ND	0.0250	1	12/18/24	12/19/24	
Surrogate: 4-Bromochlorobenzene-PID		*95.6 %*	*70-130*	*12/18/24*	*12/19/24*	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: SL			Batch: 2451058
Gasoline Range Organics (C6-C10)	ND	20.0	1	12/18/24	12/19/24	
Surrogate: 1-Chloro-4-fluorobenzene-FID		*91.5 %*	*70-130*	*12/18/24*	*12/19/24*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: NV			Batch: 2451063
Diesel Range Organics (C10-C28)	ND	50.0	2	12/18/24	12/19/24	
Oil Range Organics (C28-C36)	**179**	100	2	12/18/24	12/19/24	
Surrogate: n-Nonane		*120 %*	*50-200*	*12/18/24*	*12/19/24*	

QC Summary Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	**Reported:**
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	12/20/2024 11:58:28AM

Volatile Organics by EPA 8021B

Analyst: SL

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2451058-BLK1)									Prepared: 12/18/24 Analyzed: 12/19/24
Benzene	ND	0.0250							
Ethylbenzene	ND	0.0250							
Toluene	ND	0.0250							
o-Xylene	ND	0.0250							
p,m-Xylene	ND	0.0500							
Total Xylenes	ND	0.0250							
Surrogate: 4-Bromochlorobenzene-PID	*7.58*		*8.00*		*94.7*	*70-130*			
LCS (2451058-BS1)									Prepared: 12/18/24 Analyzed: 12/19/24
Benzene	5.21	0.0250	5.00		104	70-130			
Ethylbenzene	5.07	0.0250	5.00		101	70-130			
Toluene	5.17	0.0250	5.00		103	70-130			
o-Xylene	5.08	0.0250	5.00		102	70-130			
p,m-Xylene	10.3	0.0500	10.0		103	70-130			
Total Xylenes	15.4	0.0250	15.0		103	70-130			
Surrogate: 4-Bromochlorobenzene-PID	*7.61*		*8.00*		*95.2*	*70-130*			
LCS Dup (2451058-BSD1)									Prepared: 12/18/24 Analyzed: 12/19/24
Benzene	5.01	0.0250	5.00		100	70-130	3.82	20	
Ethylbenzene	4.89	0.0250	5.00		97.8	70-130	3.61	20	
Toluene	4.98	0.0250	5.00		99.6	70-130	3.80	20	
o-Xylene	4.91	0.0250	5.00		98.2	70-130	3.47	20	
p,m-Xylene	9.94	0.0500	10.0		99.4	70-130	3.53	20	
Total Xylenes	14.8	0.0250	15.0		99.0	70-130	3.51	20	
Surrogate: 4-Bromochlorobenzene-PID	*7.63*		*8.00*		*95.4*	*70-130*			

QC Summary Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	**Reported:**
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	12/20/2024 11:58:28AM

Nonhalogenated Organics by EPA 8015D - GRO

Analyst: SL

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2451058-BLK1)									Prepared: 12/18/24 Analyzed: 12/19/24
Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	*7.39*		*8.00*		*92.4*	*70-130*			
LCS (2451058-BS2)									Prepared: 12/18/24 Analyzed: 12/19/24
Gasoline Range Organics (C6-C10)	43.4	20.0	50.0		86.8	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	*7.49*		*8.00*		*93.6*	*70-130*			
LCS Dup (2451058-BSD2)									Prepared: 12/18/24 Analyzed: 12/19/24
Gasoline Range Organics (C6-C10)	42.7	20.0	50.0		85.4	70-130	1.65	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	*7.47*		*8.00*		*93.4*	*70-130*			

QC Summary Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	**Reported:**
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	12/20/2024 11:58:28AM

Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: NV

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2451063-BLK1)									Prepared: 12/18/24 Analyzed: 12/18/24
Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: n-Nonane	*55.6*		*50.0*		*111*	*50-200*			
LCS (2451063-BS1)									Prepared: 12/18/24 Analyzed: 12/18/24
Diesel Range Organics (C10-C28)	281	25.0	250		112	38-132			
Surrogate: n-Nonane	*53.0*		*50.0*		*106*	*50-200*			
Matrix Spike (2451063-MS1)				**Source: E412142-02**					Prepared: 12/18/24 Analyzed: 12/19/24
Diesel Range Organics (C10-C28)	515	25.0	250	140	150	38-132			M4
Surrogate: n-Nonane	*58.9*		*50.0*		*118*	*50-200*			
Matrix Spike Dup (2451063-MSD1)				**Source: E412142-02**					Prepared: 12/18/24 Analyzed: 12/19/24
Diesel Range Organics (C10-C28)	520	25.0	250	140	152	38-132	0.972	20	M4
Surrogate: n-Nonane	*59.4*		*50.0*		*119*	*50-200*			

QC Summary Report Comment:
Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures. Therefore, hand calculated values may differ slightly.

Definitions and Notes

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	
PO Box 1653	Project Number:	20035-C-0001	**Reported:**
Durango CO, 81302	Project Manager:	Kyle Siesser	12/20/24 11:58

M4	Matrix spike recovery value is suspect since the analyte concentration in the sample is disproportionate to the spike level. The associated LCS spike recovery was acceptable.
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
RPD	Relative Percent Difference
DNI	Did Not Ignite
DNR	Did not react with the addition of acid or base.

Note (1): Methods marked with ** are non-accredited methods.

Note (2): Soil data is reported on an "as received" weight basis, unless reported otherwise.

Project Information | Chain of Custody | Page 1 of 1

Client: Cottonwood Consulting	Bill To
Project: EPCMU #12 (H-19)	Attention:
Project Manager: Kyle Siesser	Address:
Address: PO Box 1653	City, State, Zip
City, State, Zip Durango, CO 81302	Phone:
Phone: 970-764-7356	Email:
Email: ksiesser@cottonwoodconsulting,com	
Report due by:	

Lab Use Only: Lab WO# E412142 | Job Number 20035-c-0001

TAT: 1D | 2D | 3D | Standard (X)

EPA Program: CWA | SDWA | RCRA

State: NM (x) | CO | UT | AZ | TX

Analysis and Method: DRO 8015 | GRO/DRO by 8015 | BTEX by 8021 | VOC by 8260 | Metals 6010 | Chloride 300.0

Time Sampled	Date Sampled	Matrix	No. of Containers	Sample ID	Lab Number	DRO 8015	GRO/DRO by 8015	BTEX by 8021	VOC by 8260	Metals 6010	Chloride 300.0	Remarks
1015	12-18-2024	Soil	2	SS03	1	✓	✓	✓				
1020				SS04	2							
1025				SS05	3							
1030				SS06	4							
1035				SS07	5							
1040				5508	6							

Additional Instructions:
please cc jlafortune@cottonwoodconsulting.com with results

I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabelling the sample location, date or time of collection is considered fraud and may be grounds for legal action. Sampled by:

Samples requiring thermal preservation must be received on ice the day they are sampled or received packed in ice at an avg temp above 0 but less than 6 °C on subsequent days.

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
[signature]	12-18-24	1345	Noe Soto	12-18-24	1345

Lab Use Only
Received on ice: (Y) / N
T1 T2 T3
AVG Temp °C 4

Sample Matrix: **S** - Soil, **Sd** - Solid, **Sg** - Sludge, **A** - Aqueous, **O** - Other _____
Container Type: **g** - glass, **p** - poly/plastic, **ag** - amber glass, v - VOA

Note: Samples are discarded 30 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.

envirotech

Project Information | Chain of Custody | Page 1 of 1

Client: Cottonwood Consulting	Bill To
Project: EPCMU #12 (H-19)	Attention:
Project Manager: Kyle Siesser	Address:
Address: PO Box 1653	City, State, Zip
City, State, Zip Durango, CO 81302	Phone:
Phone: 970-764-7356	Email:
Email: ksiesser@cottonwoodconsulting.com	
Report due by:	

Lab Use Only

Lab WO#	Job Number
E412142	20035-C-0001

TAT

1D	2D	3D	Standard
X			~~X~~ NB

EPA Program

CWA	SDWA	RCRA

State

NM	CO	UT	AZ	TX	
x					

Time Sampled	Date Sampled	Matrix	No. of Containers	Sample ID	Lab Number	DRO 8015	GRO/DRO by 8015	BTEX by 8021	VOC by 8260	Metals 6010	Chloride 300.0	Remarks
1015	12-18-2024	Soil	2	SS03	1	✓	✓	✓				Per K. Siesser
1020				SS04	2							change TAT
1025				SS05	3							to 1-Day.
1030				SS06	4							NS. 12-18-24
1035				SS07	5							
1040				SS08	6							

Additional Instructions:
please cc jlafortune@cottonwoodconsulting.com with results

I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabelling the sample location, date or time of collection is considered fraud and may be grounds for legal action. Sampled by:

Samples requiring thermal preservation must be received on ice the day they are sampled or received packed in ice at an avg temp above 0 but less than 6 °C on subsequent days.

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
[signature]	12-18-24	1345	Noe Soto	12-18-24	1345
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time

Lab Use Only
Received on ice: (Y) N
T1 T2 T3
AVG Temp °C 4

Sample Matrix: S - Soil, Sd - Solid, Sg - Sludge, A - Aqueous, O - Other _____
Container Type: g - glass, p - poly/plastic, ag - amber glass, v - VOA

Note: Samples are discarded 30 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.

envirotech

Envirotech Analytical Laboratory

Printed: 12/19/2024 3:04:34PM

Sample Receipt Checklist (SRC)

Instructions: Please take note of any NO checkmarks.
If we receive no response concerning these items within 24 hours of the date of this notice, all the samples will be analyzed as requested.

Client:	Cottonwood Consulting	Date Received:	12/18/24 13:45	Work Order ID:	E412142
Phone:	970-764-7356	Date Logged In:	12/18/24 14:29	Logged In By:	Noe Soto
Email:	ksiesser@cottonwoodconsulting.com	Due Date:	12/19/24 17:00 (1 day TAT)		

Chain of Custody (COC)

1. Does the sample ID match the COC?	Yes	
2. Does the number of samples per sampling site location match the COC	Yes	
3. Were samples dropped off by client or carrier?	Yes	Carrier: Joseph LaFortune
4. Was the COC complete, i.e., signatures, dates/times, requested analyses?	Yes	
5. Were all samples received within holding time? Note: Analysis, such as pH which should be conducted in the field, i.e, 15 minute hold time, are not included in this disucssion.	Yes	

Sample Turn Around Time (TAT)

6. Did the COC indicate standard TAT, or Expedited TAT?	Yes	

Sample Cooler

7. Was a sample cooler received?	Yes	
8. If yes, was cooler received in good condition?	Yes	
9. Was the sample(s) received intact, i.e., not broken?	Yes	
10. Were custody/security seals present?	No	
11. If yes, were custody/security seals intact?	NA	
12. Was the sample received on ice? If yes, the recorded temp is 4°C, i.e., 6°±2°C Note: Thermal preservation is not required, if samples are received w/i 15 minutes of sampling	Yes	
13. If no visible ice, record the temperature. Actual sample temperature: 4°C		

Sample Container

14. Are aqueous VOC samples present?	No	
15. Are VOC samples collected in VOA Vials?	NA	
16. Is the head space less than 6-8 mm (pea sized or less)?	NA	
17. Was a trip blank (TB) included for VOC analyses?	NA	
18. Are non-VOC samples collected in the correct containers?	Yes	
19. Is the appropriate volume/weight or number of sample containers collected?	Yes	

Field Label

20. Were field sample labels filled out with the minimum information:		
Sample ID?	Yes	
Date/Time Collected?	Yes	
Collectors name?	Yes	

Sample Preservation

21. Does the COC or field labels indicate the samples were preserved?	No	
22. Are sample(s) correctly preserved?	NA	
24. Is lab filteration required and/or requested for dissolved metals?	No	

Multiphase Sample Matrix

26. Does the sample have more than one phase, i.e., multiphase?	No	
27. If yes, does the COC specify which phase(s) is to be analyzed?	NA	

Subcontract Laboratory

28. Are samples required to get sent to a subcontract laboratory?	No	
29. Was a subcontract laboratory specified by the client and if so who?	NA	Subcontract Lab: NA

Comments/Resolution

Sampled by name is missing on COC by client.

Client Instruction

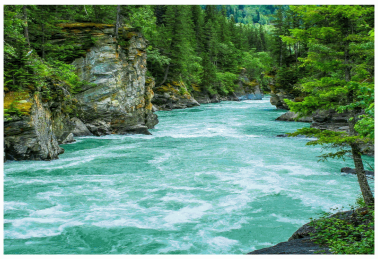
Signature of client authorizing changes to the COC or sample disposition.

Date

envirotech Inc.

Report to:

Kyle Siesser



5796 U.S. Hwy 64
Farmington, NM 87401

Phone: (505) 632-1881
Envirotech-inc.com

envirotech

Practical Solutions for a Better Tomorrow

Analytical Report

Cottonwood Consulting

Project Name:	EPCMU #12 (H-19)
Work Order:	E412191
Job Number:	20035-C-0001
Received:	12/23/2024

Revision: 2

Report Reviewed By:

Walter Hinchman
Laboratory Director
12/24/24

Envirotech Inc. certifies the test results meet all requirements of TNI unless noted otherwise.
Statement of Data Authenticity: Envirotech Inc, attests the data reported has not been altered in any way.

Envirotech Inc, holds the Utah TNI certification NM00979 for data reported.
Envirotech Inc, holds the Texas TNI certification T104704557 for data reported.

Date Reported: 12/24/24

Kyle Siesser
PO Box 1653
Durango, CO 81302

Project Name: EPCMU #12 (H-19)
Workorder: E412191
Date Received: 12/23/2024 2:15:00PM

Kyle Siesser,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 12/23/2024 2:15:00PM, under the Project Name: EPCMU #12 (H-19).

The analytical test results summarized in this report with the Project Name: EPCMU #12 (H-19) apply to the individual samples collected, identified and submitted bearing the project name on the enclosed chain-of-custody. Subcontracted sample analyses not conducted by Envirotech, Inc., are attached in full as issued by the subcontract laboratory.

Please review the Chain-of-Custody (COC) and Sample Receipt Checklist (SRC) for any issues reguarding sample receipt temperature, containers, preservation etc. To best understand your test results, review the entire report summarizing your sample data and the associated quality control batch data.

All reported data in this analytical report were analyzed according to the referenced method(s) and are in compliance with the latest NELAC/TNI standards, unless otherwise noted. Samples or analytical quality control parameters not meeting specific QC criteria are qualified with a data flag. Data flag definitions are located in the Notes and Definitions section of this analytical report.

If you have any questions concerning this report, please feel free to contact Envirotech, Inc.

Respectfully,

Walter Hinchman
Laboratory Director
Office: 505-632-1881
Cell: 775-287-1762
whinchman@envirotech-inc.com

Raina Schwanz
Laboratory Administrator
Office: 505-632-1881
rainaschwanz@envirotech-inc.com

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Office: 505-421-LABS(5227)
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ljarboe@envirotech-inc.com

Michelle Gonzales
Client Representative
Office: 505-421-LABS(5227)
Cell: 505-947-8222
mgonzales@envirotech-inc.com

Envirotech Web Address: www.envirotech-inc.com

Table of Contents

Sample Summary

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	**Reported:**
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	12/24/24 10:11

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
SS09	E412191-01A	Soil	12/23/24	12/23/24	Glass Jar, 4 oz.
	E412191-01B	Soil	12/23/24	12/23/24	Glass Jar, 4 oz.
SS10	E412191-02A	Soil	12/23/24	12/23/24	Glass Jar, 4 oz.
	E412191-02B	Soil	12/23/24	12/23/24	Glass Jar, 4 oz.
SS11	E412191-03A	Soil	12/23/24	12/23/24	Glass Jar, 4 oz.
	E412191-03B	Soil	12/23/24	12/23/24	Glass Jar, 4 oz.

Sample Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	
PO Box 1653	Project Number:	20035-C-0001	**Reported:**
Durango CO, 81302	Project Manager:	Kyle Siesser	12/24/2024 10:11:42AM

SS09

E412191-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organic Compounds by EPA 8260B	mg/kg	mg/kg	Analyst: RKS			Batch: 2452026
Benzene	ND	0.0250	1	12/23/24	12/23/24	
Ethylbenzene	ND	0.0250	1	12/23/24	12/23/24	
Toluene	ND	0.0250	1	12/23/24	12/23/24	
o-Xylene	ND	0.0250	1	12/23/24	12/23/24	
p,m-Xylene	ND	0.0500	1	12/23/24	12/23/24	
Total Xylenes	ND	0.0250	1	12/23/24	12/23/24	
Surrogate: Bromofluorobenzene		*118 %*	*70-130*	*12/23/24*	*12/23/24*	
Surrogate: 1,2-Dichloroethane-d4		*95.5 %*	*70-130*	*12/23/24*	*12/23/24*	
Surrogate: Toluene-d8		*113 %*	*70-130*	*12/23/24*	*12/23/24*	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: RKS			Batch: 2452026
Gasoline Range Organics (C6-C10)	ND	20.0	1	12/23/24	12/23/24	
Surrogate: Bromofluorobenzene		*118 %*	*70-130*	*12/23/24*	*12/23/24*	
Surrogate: 1,2-Dichloroethane-d4		*95.5 %*	*70-130*	*12/23/24*	*12/23/24*	
Surrogate: Toluene-d8		*113 %*	*70-130*	*12/23/24*	*12/23/24*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: NV			Batch: 2452018
Diesel Range Organics (C10-C28)	ND	25.0	1	12/23/24	12/24/24	
Oil Range Organics (C28-C36)	ND	50.0	1	12/23/24	12/24/24	
Surrogate: n-Nonane		*104 %*	*50-200*	*12/23/24*	*12/24/24*	

Sample Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	
PO Box 1653	Project Number:	20035-C-0001	**Reported:**
Durango CO, 81302	Project Manager:	Kyle Siesser	12/24/2024 10:11:42AM

SS10

E412191-02

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organic Compounds by EPA 8260B	mg/kg	mg/kg	Analyst: RKS			Batch: 2452026
Benzene	ND	0.0250	1	12/23/24	12/23/24	
Ethylbenzene	ND	0.0250	1	12/23/24	12/23/24	
Toluene	ND	0.0250	1	12/23/24	12/23/24	
o-Xylene	ND	0.0250	1	12/23/24	12/23/24	
p,m-Xylene	ND	0.0500	1	12/23/24	12/23/24	
Total Xylenes	ND	0.0250	1	12/23/24	12/23/24	
Surrogate: Bromofluorobenzene		*117 %*	*70-130*	*12/23/24*	*12/23/24*	
Surrogate: 1,2-Dichloroethane-d4		*95.8 %*	*70-130*	*12/23/24*	*12/23/24*	
Surrogate: Toluene-d8		*112 %*	*70-130*	*12/23/24*	*12/23/24*	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: RKS			Batch: 2452026
Gasoline Range Organics (C6-C10)	ND	20.0	1	12/23/24	12/23/24	
Surrogate: Bromofluorobenzene		*117 %*	*70-130*	*12/23/24*	*12/23/24*	
Surrogate: 1,2-Dichloroethane-d4		*95.8 %*	*70-130*	*12/23/24*	*12/23/24*	
Surrogate: Toluene-d8		*112 %*	*70-130*	*12/23/24*	*12/23/24*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: NV			Batch: 2452018
Diesel Range Organics (C10-C28)	ND	25.0	1	12/23/24	12/24/24	
Oil Range Organics (C28-C36)	**60.9**	50.0	1	12/23/24	12/24/24	
Surrogate: n-Nonane		*107 %*	*50-200*	*12/23/24*	*12/24/24*	

Sample Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	
PO Box 1653	Project Number:	20035-C-0001	**Reported:**
Durango CO, 81302	Project Manager:	Kyle Siesser	12/24/2024 10:11:42AM

SS11

E412191-03

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organic Compounds by EPA 8260B	mg/kg	mg/kg	Analyst: RKS			Batch: 2452026
Benzene	ND	0.0250	1	12/23/24	12/23/24	
Ethylbenzene	ND	0.0250	1	12/23/24	12/23/24	
Toluene	ND	0.0250	1	12/23/24	12/23/24	
o-Xylene	ND	0.0250	1	12/23/24	12/23/24	
p,m-Xylene	ND	0.0500	1	12/23/24	12/23/24	
Total Xylenes	ND	0.0250	1	12/23/24	12/23/24	
Surrogate: Bromofluorobenzene		*115 %*	*70-130*	*12/23/24*	*12/23/24*	
Surrogate: 1,2-Dichloroethane-d4		*94.2 %*	*70-130*	*12/23/24*	*12/23/24*	
Surrogate: Toluene-d8		*112 %*	*70-130*	*12/23/24*	*12/23/24*	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: RKS			Batch: 2452026
Gasoline Range Organics (C6-C10)	ND	20.0	1	12/23/24	12/23/24	
Surrogate: Bromofluorobenzene		*115 %*	*70-130*	*12/23/24*	*12/23/24*	
Surrogate: 1,2-Dichloroethane-d4		*94.2 %*	*70-130*	*12/23/24*	*12/23/24*	
Surrogate: Toluene-d8		*112 %*	*70-130*	*12/23/24*	*12/23/24*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: NV			Batch: 2452018
Diesel Range Organics (C10-C28)	ND	25.0	1	12/23/24	12/24/24	
Oil Range Organics (C28-C36)	**64.4**	50.0	1	12/23/24	12/24/24	
Surrogate: n-Nonane		*107 %*	*50-200*	*12/23/24*	*12/24/24*	

QC Summary Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	**Reported:**
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	12/24/2024 10:11:42AM

Volatile Organic Compounds by EPA 8260B

Analyst: RKS

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2452026-BLK1)									Prepared: 12/23/24 Analyzed: 12/23/24
Benzene	ND	0.0250							
Ethylbenzene	ND	0.0250							
Toluene	ND	0.0250							
o-Xylene	ND	0.0250							
p,m-Xylene	ND	0.0500							
Total Xylenes	ND	0.0250							
Surrogate: Bromofluorobenzene	*0.605*		*0.500*		*121*	*70-130*			
Surrogate: 1,2-Dichloroethane-d4	*0.459*		*0.500*		*91.7*	*70-130*			
Surrogate: Toluene-d8	*0.567*		*0.500*		*113*	*70-130*			
LCS (2452026-BS1)									Prepared: 12/23/24 Analyzed: 12/23/24
Benzene	2.66	0.0250	2.50		106	70-130			
Ethylbenzene	2.78	0.0250	2.50		111	70-130			
Toluene	2.74	0.0250	2.50		109	70-130			
o-Xylene	2.91	0.0250	2.50		116	70-130			
p,m-Xylene	5.79	0.0500	5.00		116	70-130			
Total Xylenes	8.69	0.0250	7.50		116	70-130			
Surrogate: Bromofluorobenzene	*0.606*		*0.500*		*121*	*70-130*			
Surrogate: 1,2-Dichloroethane-d4	*0.464*		*0.500*		*92.8*	*70-130*			
Surrogate: Toluene-d8	*0.551*		*0.500*		*110*	*70-130*			
LCS Dup (2452026-BSD1)									Prepared: 12/23/24 Analyzed: 12/23/24
Benzene	2.47	0.0250	2.50		98.7	70-130	7.38	23	
Ethylbenzene	2.62	0.0250	2.50		105	70-130	6.22	27	
Toluene	2.56	0.0250	2.50		103	70-130	6.53	24	
o-Xylene	2.75	0.0250	2.50		110	70-130	5.70	27	
p,m-Xylene	5.47	0.0500	5.00		109	70-130	5.61	27	
Total Xylenes	8.22	0.0250	7.50		110	70-130	5.64	27	
Surrogate: Bromofluorobenzene	*0.599*		*0.500*		*120*	*70-130*			
Surrogate: 1,2-Dichloroethane-d4	*0.480*		*0.500*		*95.9*	*70-130*			
Surrogate: Toluene-d8	*0.557*		*0.500*		*111*	*70-130*			

QC Summary Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	**Reported:**
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	12/24/2024 10:11:42AM

Nonhalogenated Organics by EPA 8015D - GRO

Analyst: RKS

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2452026-BLK1)									Prepared: 12/23/24 Analyzed: 12/23/24
Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: Bromofluorobenzene	*0.605*		*0.500*		*121*	*70-130*			
Surrogate: 1,2-Dichloroethane-d4	*0.459*		*0.500*		*91.7*	*70-130*			
Surrogate: Toluene-d8	*0.567*		*0.500*		*113*	*70-130*			
LCS (2452026-BS2)									Prepared: 12/23/24 Analyzed: 12/23/24
Gasoline Range Organics (C6-C10)	60.4	20.0	50.0		121	70-130			
Surrogate: Bromofluorobenzene	*0.609*		*0.500*		*122*	*70-130*			
Surrogate: 1,2-Dichloroethane-d4	*0.492*		*0.500*		*98.3*	*70-130*			
Surrogate: Toluene-d8	*0.559*		*0.500*		*112*	*70-130*			
LCS Dup (2452026-BSD2)									Prepared: 12/23/24 Analyzed: 12/23/24
Gasoline Range Organics (C6-C10)	59.8	20.0	50.0		120	70-130	1.07	20	
Surrogate: Bromofluorobenzene	*0.606*		*0.500*		*121*	*70-130*			
Surrogate: 1,2-Dichloroethane-d4	*0.479*		*0.500*		*95.7*	*70-130*			
Surrogate: Toluene-d8	*0.572*		*0.500*		*114*	*70-130*			

QC Summary Data

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	**Reported:**
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	12/24/2024 10:11:42AM

Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: NV

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2452018-BLK1)									Prepared: 12/23/24 Analyzed: 12/23/24
Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: n-Nonane	*53.4*		*50.0*		*107*	*50-200*			
LCS (2452018-BS1)									Prepared: 12/23/24 Analyzed: 12/23/24
Diesel Range Organics (C10-C28)	267	25.0	250		107	38-132			
Surrogate: n-Nonane	*53.7*		*50.0*		*107*	*50-200*			
Matrix Spike (2452018-MS1)				**Source: E412181-05**					Prepared: 12/23/24 Analyzed: 12/23/24
Diesel Range Organics (C10-C28)	270	25.0	250	ND	108	38-132			
Surrogate: n-Nonane	*55.2*		*50.0*		*110*	*50-200*			
Matrix Spike Dup (2452018-MSD1)				**Source: E412181-05**					Prepared: 12/23/24 Analyzed: 12/23/24
Diesel Range Organics (C10-C28)	271	25.0	250	ND	108	38-132	0.372	20	
Surrogate: n-Nonane	*52.4*		*50.0*		*105*	*50-200*			

QC Summary Report Comment:
Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures. Therefore, hand calculated values may differ slightly.

Definitions and Notes

Cottonwood Consulting	Project Name:	EPCMU #12 (H-19)	
PO Box 1653	Project Number:	20035-C-0001	**Reported:**
Durango CO, 81302	Project Manager:	Kyle Siesser	12/24/24 10:11

ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
RPD	Relative Percent Difference
DNI	Did Not Ignite
DNR	Did not react with the addition of acid or base.

Note (1): Methods marked with ** are non-accredited methods.

Note (2): Soil data is reported on an "as received" weight basis, unless reported otherwise.

Chain of Custody

Client Information	Invoice Information	Lab Use Only	TAT	State
Client: Cottonwood Consulting	Company:	Lab WO# E412191	1D 2D 3D Std	NM CO UT TX
Project Name: EPCMU #12 (H-18)	Address:	Job Number 20035-C-0001	X	X
Project Manager: Kyle Siesser	City, State, Zip:			
Address: PO Box 1653	Phone:			
City, State, Zip: Durango, CO 81302	Email:			
Phone: 970 764 7356	Miscellaneous:			
Email: KSiesser@cottonwoodconsulting.com				

Sample Information

Time Sampled	Date Sampled	Matrix	No. of Containers	Sample ID	Field Filter	Lab Number	DRO/ORO by 8015	GRO/DRO by 8015	BTEX by 8021	VOC by 8260	Chloride 300.0	BGDOC - NM	TCEQ 1005 - TX	RCRA 8 Metals	Cation/Anion Pkg			Remarks
1035	12-23-24	Soil	2	SS04		1	X	X	X									
1040	↓	Soil	2	SS10		2	X	X	X									
1100	↓	Soil	2	SS11		3	X	X	X									

Analysis and Method

EPA Program

SDWA	CWA	RCRA

Compliance Y or N

PWSID #

Additional Instructions:
Please email results to jlafortune@cottonwoodconsulting.com

I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabeling the sample location, date or time of collection is considered fraud and may be grounds for legal action.

Sampled by: Joseph LaFortune

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
	12-23-24	1415		12/23/24	14:15

Samples requiring thermal preservation must be received on ice the day they are sampled or received packed in ice at an avg temp above 0 but less than 6 °C on subsequent days.

Lab Use Only
Received on ice: Y / N
T1 T2 T3
AVG Temp °C 4

Sample Matrix: **S** - Soil, **Sd** - Solid, **Sg** - Sludge, **A** - Aqueous, **O** - Other

Container Type: **g** - glass, **p** - poly/plastic, **ag** - amber glass, **v** - VOA

Note: Samples are discarded 14 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.

envirotech

Envirotech Analytical Laboratory

Printed: 12/23/2024 2:23:37PM

Sample Receipt Checklist (SRC)

Instructions: Please take note of any NO checkmarks.
If we receive no response concerning these items within 24 hours of the date of this notice, all the samples will be analyzed as requested.

Client:	Cottonwood Consulting	Date Received:	12/23/24 14:15	Work Order ID:	E412191
Phone:	970-764-7356	Date Logged In:	12/23/24 14:18	Logged In By:	Noe Soto
Email:	ksiesser@cottonwoodconsulting.com	Due Date:	12/24/24 17:00 (1 day TAT)		

Chain of Custody (COC)

1. Does the sample ID match the COC?	Yes	
2. Does the number of samples per sampling site location match the COC	Yes	
3. Were samples dropped off by client or carrier?	Yes	Carrier: Joseph LaFortune
4. Was the COC complete, i.e., signatures, dates/times, requested analyses?	Yes	
5. Were all samples received within holding time? Note: Analysis, such as pH which should be conducted in the field, i.e, 15 minute hold time, are not included in this disucssion.	Yes	

Comments/Resolution

Sample Turn Around Time (TAT)

6. Did the COC indicate standard TAT, or Expedited TAT?	Yes	

Sample Cooler

7. Was a sample cooler received?	Yes	
8. If yes, was cooler received in good condition?	Yes	
9. Was the sample(s) received intact, i.e., not broken?	Yes	
10. Were custody/security seals present?	No	
11. If yes, were custody/security seals intact?	NA	
12. Was the sample received on ice? If yes, the recorded temp is 4°C, i.e., 6°±2°C Note: Thermal preservation is not required, if samples are received w/i 15 minutes of sampling	Yes	
13. If no visible ice, record the temperature. Actual sample temperature: 4°C		

Sample Container

14. Are aqueous VOC samples present?	No	
15. Are VOC samples collected in VOA Vials?	NA	
16. Is the head space less than 6-8 mm (pea sized or less)?	NA	
17. Was a trip blank (TB) included for VOC analyses?	NA	
18. Are non-VOC samples collected in the correct containers?	Yes	
19. Is the appropriate volume/weight or number of sample containers collected?	Yes	

Field Label

20. Were field sample labels filled out with the minimum information:		
Sample ID?	Yes	
Date/Time Collected?	Yes	
Collectors name?	Yes	

Sample Preservation

21. Does the COC or field labels indicate the samples were preserved?	No	
22. Are sample(s) correctly preserved?	NA	
24. Is lab filteration required and/or requested for dissolved metals?	No	

Multiphase Sample Matrix

26. Does the sample have more than one phase, i.e., multiphase?	No	
27. If yes, does the COC specify which phase(s) is to be analyzed?	NA	

Subcontract Laboratory

28. Are samples required to get sent to a subcontract laboratory?	No	
29. Was a subcontract laboratory specified by the client and if so who?	NA	Subcontract Lab: NA

Client Instruction

Signature of client authorizing changes to the COC or sample disposition.

Date

envirotech Inc.

Chain of Custody

Client Information	Invoice Information	Lab Use Only	TAT	State
Client: Cottonwood Consulting	Company:	Lab WO# E412191	Job Number 20035-C-0001	1D: X; 2D; 3D; Std	NM: X; CO; UT; TX
Project Name: EPCMU #12 (M-18) 19	Address:			
Project Manager: Tyler Siesser	City, State, Zip:			
Address: po Box 1653	Phone:			
City, State, Zip: Durango Co 81302	Email:			
Phone: 970 764 7356	Miscellaneous:			
Email: TSiesser@cottonwoodconsulting.com				

Sample Information

Time Sampled	Date Sampled	Matrix	No. of Containers	Sample ID	Field Filter	Lab Number	DRO/ORO by 8015	GRO/DRO by 8015	BTEX by 8021	VOC by 8260	Chloride 300.0	BGDOC - NM	TCEQ 1005 - TX	RCRA 8 Metals	Cation/Anion Pkg	Remarks
1035	12-23-24	Soil	2	SS04		1	X	X	X							Corrected Project name per Client. 12/24/24 CM
1040	↓	Soil	2	SS10		2	X	X	X							
1100	↓	Soil	2	SS11		3	X	X	X							

EPA Program: SDWA | CWA | RCRA

Compliance: Y or N

PWSID #

Additional Instructions:
Please email results to jlafortune@cottonwoodconsulting.com

I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabeling the sample location, date or time of collection is considered fraud and may be grounds for legal action.

Sampled by: Joseph LaFortune

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
	12-23-24	1415		12/23/24	14:15

Samples requiring thermal preservation must be received on ice the day they are sampled or received packed in ice at an avg temp above 0 but less than 6 °C on subsequent days.

Lab Use Only
Received on ice: Y / N

T1 T2 T3

AVG Temp °C 4

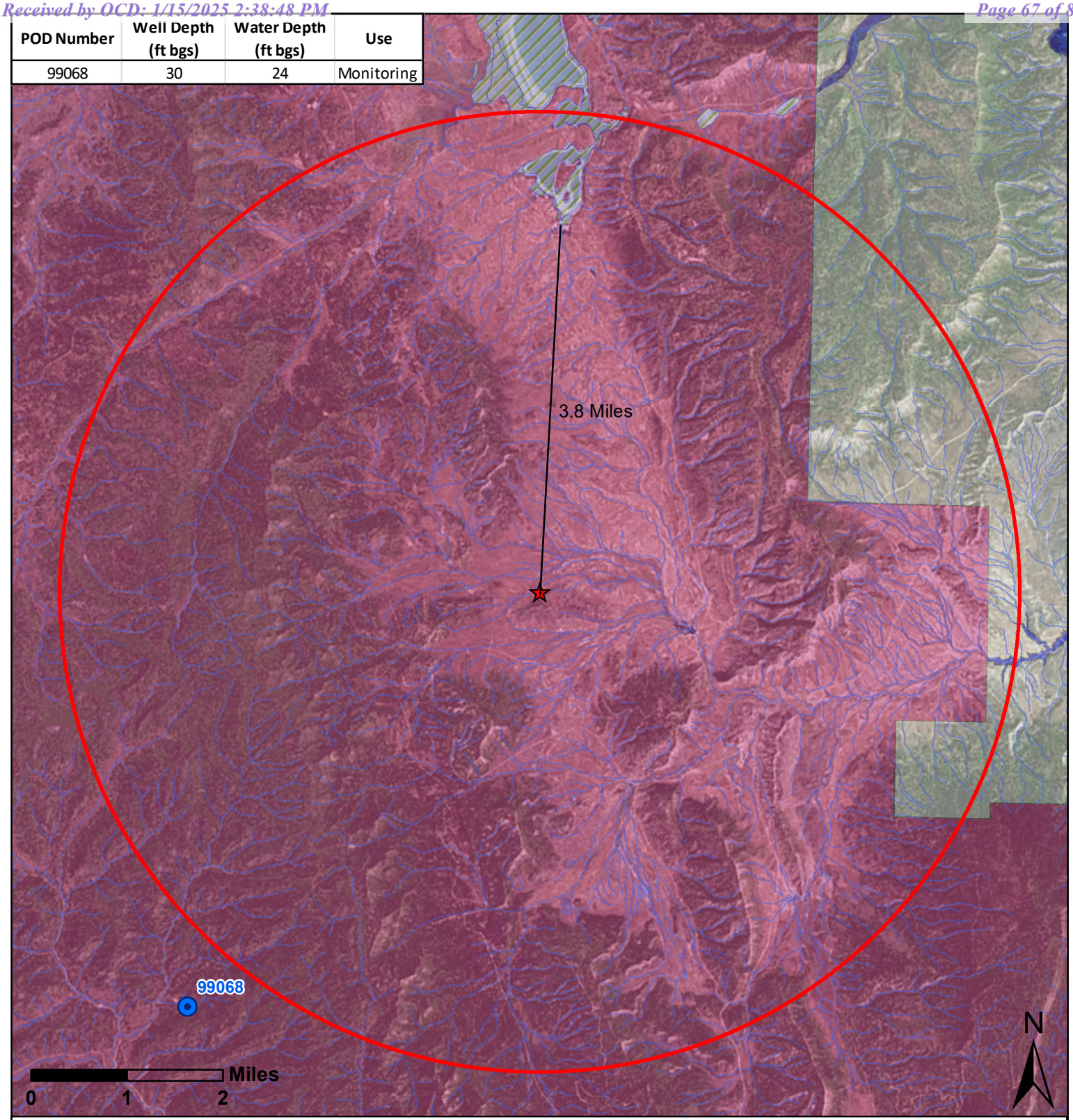
Sample Matrix: S - Soil, Sd - Solid, Sg - Sludge, A - Aqueous, O - Other

Container Type: g - glass, p - poly/plastic, ag - amber glass, v - VOA

Note: Samples are discarded 14 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.

envirotech

POD Number	Well Depth (ft bgs)	Water Depth (ft bgs)	Use
99068	30	24	Monitoring



Notes: Water well data from the New Mexico Office of the State Engineer. Wetland data from the National Hydrography Dataset. Floodplain data from the Federal Emergency Management Agency.

Legend

- Point of Release
- Water Well
- 5 Mile Buffer
- Wetland
- A; 100-year Floodplain
- D; Undetermined
- X; Area of Minimal Flood Hazard

Cottonwood CONSULTING

Mapping by: K. O'Brien, 1/8/2025
Coordinate System:
NAD 1983 UTM Zone 13 N

Location: Sec 19 T27N R1WE NMPM

EPCMU #012
Hydrology Map
Benson-Montin-Greer Drilling Corp

From: Zach Stradling
To: Kyle Siesser
Subject: Fwd: Final Closure Plan - EPCMU 12 (H-19) API #30-039-06863
Date: Tuesday, January 14, 2025 10:44:09 AM

Good morning Kyle,
We have received confirmation from JAN-EPO that the incident of non-compliance at EPCMU 12 (H-19) has been resolved. Thank you,

Zach

Zach Stradling
Benson-Montin-Greer Drilling Corp.
4900 College Blvd.
Farmington, NM 87402
(505) 325-8874

---------- Forwarded message ---------
From: **Yahoo Warning** <kcmanwell@yahoo.com>
Date: Tue, Jan 14, 2025 at 10:36 AM
Subject: Re: Final Closure Plan - EPCMU 12 (H-19) API #30-039-06863
To: Zach Stradling <zstradling@bmgdrilling.com>

Good Day Zach,

After review of final report for non-compliance issue at EPCMU 12 (H-19), JANEPO is pleased with the cooperation from BMG to resolve the incident of non-compliance. Any contaminants remaining will be addressed at P&A. any questions or comments please contact Myself at 505-330-8031 or via email.

Thank You,
K.C. Manwell

On Thursday, January 9, 2025 at 09:06:04 AM MST, Zach Stradling <zstradling@bmgdrilling.com> wrote:

Good morning Keith,
I just wanted to provide you with our final closure plan for the remediation that took place at the EPCMU 12 (H-19) and thank you for your help in the process. Please let me know if you have any questions.

Thanks again,

Zach

Zach Stradling
Benson-Montin-Greer Drilling Corp.
4900 College Blvd.

Farmington, NM 87402
(505) 325-8874

Initial notifications from JAN to BMG that we had a leak on the EPCMU 12 (H-19) well pad:

- Jason Sandoval (Jicarilla Oil & Gas) emailed me on Sunday at 9:39 am on 11/24/24 (that email is included in this forward).
- Afred Vigil (Jicarilla Oil & Gas) called me on my cell on Sunday at 9:44 am on 11/24/24. I spoke to him and let him know I would get someone out there to isolate the source right away
- Keith Manwell (JAN-EPO) tried to call the office on Sunday, 11/24/24 morning and left a voicemail.

After I received the notification from Alfred, I contacted Chip immediately and he went to the location to determine the source of the leak (the frozen, broken ball valve), removed the ball valve and capped that opening to prevent any further leaking. Our guys then began hand digging to determine the extent of the leak on Monday, 11/25/24.

Zach Stradling
Benson-Montin-Greer Drilling Corp.
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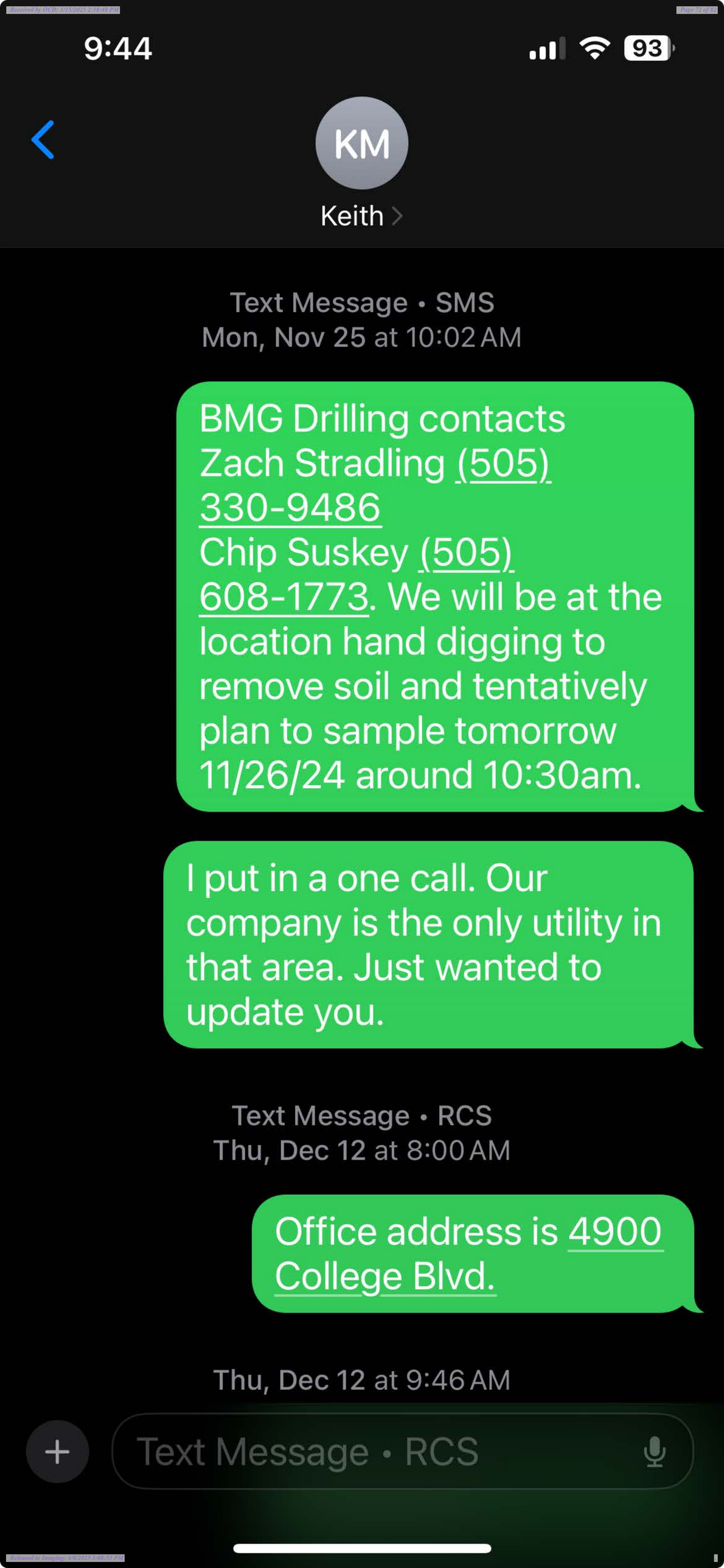
---------- Forwarded message ---------
From: **Jason Sandoval** <jasonsandoval@jicarillaoga.com>
Date: Sun, Nov 24, 2024 at 9:39 AM
Subject: Oil leak,
To: Zach Stradling <zstradling@bmgdrilling.com>

Zach,
There is an oil leak on the BMG lease EPCMU #12 (H-19). Please address this ASAP today.

Jason Sandoval
Compliance & Enforcement Supervisor
Jicarillla Oil & Gas Administration
Work: 575 759 3485
Cell: 575 419 0347
jasonsandoval@jicarillaoga.com

On Mon, Oct 21, 2024, 09:03 Zach Stradling <zstradling@bmgdrilling.com> wrote:

> Good morning,
>
> Please see attached request for permission to perform work. Thank you,
>
> Zach
>
> Zach Stradling
> Benson-Montin-Greer Drilling Corp.
> 4900 College Blvd.
> Farmington, NM 87402
> (505) 325-8874



From: Zach Stradling <zstradling@bmgdrilling.com>
Sent: Wednesday, December 18, 2024 11:12 AM
To: Keith Manwell <kcmanwell@yahoo.com>
Cc: Kyle Siesser <ksiesser@cottonwoodconsulting.com>
Subject: EPCMU 12 (H-19) Remediation

Good morning Keith,
We have excavated starting at the wellhead down approximately (6) six feet where Cottonwood had determined the soil is clean enough to collect samples, as per the approved work plan, to send to Envirotech for analysis. We will request a rush on the analyses as the excavation will remain open until results that meet closure criteria can be confirmed. I will keep you updated along the way.

As for the backfill site, the one call was put in yesterday and Llaves Pipeline (BMG Drilling Corp.) was the only company listed. We have already marked our pipeline and the backfill site is well away from the line. Would you be able to grant us permission to begin moving dirt at that site to prepare it for the transfer to the EPCMU 12 (H-19) once it is determined to be ready for backfill?

I will follow this email up with a phone call to you as well.

Please let me know if you have any questions,

Thank you,

Zach Stradling
Benson-Montin-Greer Drilling Corp.
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Farmington, NM 87402
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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 421201

QUESTIONS

Operator: BENSON-MONTIN-GREER DRILLING CORP 4900 College Blvd. Farmington, NM 87402	OGRID: 2096
	Action Number: 421201
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

Prerequisites	
Incident ID (n#)	**nAPP2500841902**
Incident Name	**NAPP2500841902 EPCMU #12 @ 30-039-06863**
Incident Type	**Release Other**
Incident Status	**Reclamation Report Received**
Incident Well	**[30-039-06863] EAST PUERTO CHIQUITO MANCOS UNIT #012**

Location of Release Source	
Please answer all the questions in this group.	
Site Name	EPCMU #12
Date Release Discovered	11/24/2024
Surface Owner	Jicarilla

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

Nature and Volume of Release	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Cause: Equipment Failure | Well | Crude Oil | Released: 0 BBL (Unknown Released Amount) | Recovered: 0 BBL | Lost: 0 BBL.
Produced Water Released (bbls) Details	*Not answered.*
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)	Initial release was discovered by a Jicarilla Apache Nation Environmental Protection Specialist. Unknown amount was released from a cracked ball valve on the wellhead, well was shut in and ball valve was replaced. During the site assessment an undocumented historical release was discovered in the area surrounding the wellhead.

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QUESTIONS (continued)

Operator: BENSON-MONTIN-GREER DRILLING CORP 4900 College Blvd. Farmington, NM 87402	OGRID: 2096
	Action Number: 421201
	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	**Yes**
Reasons why this would be considered a submission for a notification of a major release	**From paragraph A. "Major release" determine using:** **(1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.**

With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.

Initial Response	
The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury.	
The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	*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: AJ LaFortune Email: jlafortune@cottonwoodconsulting.com Date: 01/15/2025

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QUESTIONS (continued)

Operator: BENSON-MONTIN-GREER DRILLING CORP 4900 College Blvd. Farmington, NM 87402	OGRID: 2096
	Action Number: 421201
	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)	Less than or equal 25 (ft.)
What method was used to determine the depth to ground water	OCD Imaging Records Lookup
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	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 1 and 5 (mi.)
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	None
A 100-year floodplain	Between 1 and 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan	
Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.	
Requesting a remediation plan approval with this submission	Yes
Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
Soil Contamination Sampling: (Provide the highest observable value for each, in milligrams per kilograms.)	
Chloride (EPA 300.0 or SM4500 Cl B)	0
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	15839
GRO+DRO (EPA SW-846 Method 8015M)	9929
BTEX (EPA SW-846 Method 8021B or 8260B)	8.8
Benzene (EPA SW-846 Method 8021B or 8260B)	0.1
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	12/22/2024
On what date will (or did) the final sampling or liner inspection occur	12/23/2024
On what date will (or was) the remediation complete(d)	01/06/2025
What is the estimated surface area (in square feet) that will be reclaimed	0
What is the estimated volume (in cubic yards) that will be reclaimed	0
What is the estimated surface area (in square feet) that will be remediated	2781
What is the estimated volume (in cubic yards) that will be remediated	103
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 (continued)

Operator: BENSON-MONTIN-GREER DRILLING CORP 4900 College Blvd. Farmington, NM 87402	OGRID: 2096
	Action Number: 421201
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

Remediation Plan (continued)	
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.	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
(Select all answers below that apply.)	
(Ex Situ) Excavation and **off-site** disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for **off-site** disposal	ENVIROTECH LANDFARM #2 [fEEM0112336756]
OR which OCD approved well (API) will be used for **off-site** disposal	*Not answered.*
OR is the **off-site** disposal site, to be used, out-of-state	*Not answered.*
OR is the **off-site** disposal site, to be used, an NMED facility	*Not answered.*
(Ex Situ) Excavation and **on-site** 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.)	Yes
(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.*
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 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: AJ LaFortune Email: jlafortune@cottonwoodconsulting.com Date: 01/15/2025
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 (continued)

Operator: BENSON-MONTIN-GREER DRILLING CORP 4900 College Blvd. Farmington, NM 87402	OGRID: 2096
	Action Number: 421201
	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 (continued)

Operator: BENSON-MONTIN-GREER DRILLING CORP 4900 College Blvd. Farmington, NM 87402	OGRID: 2096
	Action Number: 421201
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	**420515**
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	**11/26/2024**
What was the (estimated) number of samples that were to be gathered	**9**
What was the sampling surface area in square feet	**2781**

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	2781
What was the total volume (cubic yards) remediated	101
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	0
What was the total volume (in cubic yards) reclaimed	0
Summarize any additional remediation activities not included by answers (above)	All remediation activities are included in the attached final closure plan submitted to the Jicarilla Apache Nation Environmental Protection Office. Final closure was approved by the JAN-EPO on 1/14/2025. Reclamation of the site will be conducted during final closure as discussed in the approved final closure plan attached to this form.

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: AJ LaFortune Email: jlafortune@cottonwoodconsulting.com Date: 01/15/2025

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QUESTIONS (continued)

Operator: BENSON-MONTIN-GREER DRILLING CORP 4900 College Blvd. Farmington, NM 87402	OGRID: 2096
	Action Number: 421201
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

Reclamation Report	
Only answer the questions in this group if all reclamation steps have been completed.	
Requesting a reclamation approval with this submission	Yes
What was the total reclamation surface area (in square feet) for this site	0
What was the total volume of replacement material (in cubic yards) for this site	101
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.	
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)	01/01/2035
Summarize any additional reclamation activities not included by answers (above)	Reclamation will be conducted during final decommissioning of the site as discussed in the attached final closure plan. The Jicarilla Apache Nation Environmental Protection Office has approved the attached final closure plan.
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 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: AJ LaFortune Email: jlafortune@cottonwoodconsulting.com Date: 01/15/2025

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QUESTIONS (continued)

Operator: BENSON-MONTIN-GREER DRILLING CORP 4900 College Blvd. Farmington, NM 87402	OGRID: 2096
	Action Number: 421201
	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

Operator: BENSON-MONTIN-GREER DRILLING CORP 4900 College Blvd. Farmington, NM 87402	OGRID: 2096
	Action Number: 421201
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

CONDITIONS

Created By	Condition	Condition Date
nvelez	Incident occurred on the Jicarilla Apache Reservation. OCD accepts this Jicarilla approved closure and reclamation report for the record. Per 19.15.7.9D NMAC, which states, "All such forms filed exclusively for lands or minerals owned by a Native American nation, tribe, pueblo or individual allottee shall be filed with the division using the online application process on the division's website as soon as is practicable after federal approval or processing to completion. Such forms involving exclusively lands or minerals that a Native American nation, tribe, pueblo or individually allottee owns are not subject to division review or approval unless such review or approval is authorized by a written agreement between the Native American nation, tribe, pueblo and the division".	4/8/2025