

APPROVED



CONOCOPHILLIPS

P.O. Box 2197
Houston, TX 77252-2197
Phone 281.293.1000

EVGSAU CTB (1RP-3670)

Corrective Action Plan

API No. 30-025-2667900

Release Date: June 12th, 2015

Unit Letter A, Section 33, Township 17S, Range 35E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

May 23rd, 2016

Jamie Keyes

Environmental Specialist – New Mexico Oil Conservation Division
Energy, Minerals and Natural Resources Department
1625 N. French Dr.
Hobbs, NM 88240

**RE: Corrective Action Plan
ConocoPhillips EVGSAU CTB (1RP-3670)
UL/A sec. 33 T17S R35E
API No. 30-025-2667900**

Mr. Keyes:

ConocoPhillips (CoP) has retained Basin Environmental Service Technologies to address potential environmental concerns at the above-referenced site.

Background and Previous Work

The site is located approximately 2.8 miles east south east of Buckeye, New Mexico at UL/A sec. 33 T17S R35E. NM OSE and Basin installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 70 +/- feet.

On June 12th, 2015, CoP discovered a release from an eight inch transfer line. A total of 30 barrels of oil was released over 2,042 sq ft of lease pad and 414 sq ft in the lined facility with 20 barrels of oil recovered. NMOCD was notified of the release on June 12th, 2015, and an initial C-141 was submitted and approved by NMOCD on June 15th, 2015 (Appendix A).

On June 16th, 2015, Basin personnel were on site to assess the release. On May 20th, 2016 two points within the release area were sampled with depth (Figure 1). All samples were field tested for chlorides and organic vapors, and representative samples were taken to a commercial laboratory for analysis (Appendix B).

Photo Documentation of these activities may be found in Appendix C.

Corrective Action Plan

Based on the assessment, the release around point 1 will be excavated down to 2 ft bgs, the release around point 2 will be excavated down to 1.5 ft bgs. There are buried lines running throughout the release. To provide for the safety of people and equipment at the site, the excavation will remain 5 ft away from the buried lines.

All excavated soil will be taken to a NMOCD approved facility for disposal. Clean soil will be imported to the site to serve as backfill. A sample of the backfill soil will be taken to a commercial laboratory to confirm that the chloride reading is below regulatory standards. The lease pad will be backfilled with clean, imported soil. The site will be contoured to the surrounding location.

Once these activities have been completed, a report will be sent to NMOCD requesting 'remediation termination' and site closure.

Basin appreciates the opportunity to work with you on this project. Please contact me if you have any questions or wish to discuss the site.

Sincerely,

A handwritten signature in cursive script that reads "Kyle Norman". The signature is written in black ink and includes a horizontal line extending to the right from the end of the name.

Kyle Norman
Project Lead
Basin Environmental Service Technologies
(575) 942-8542

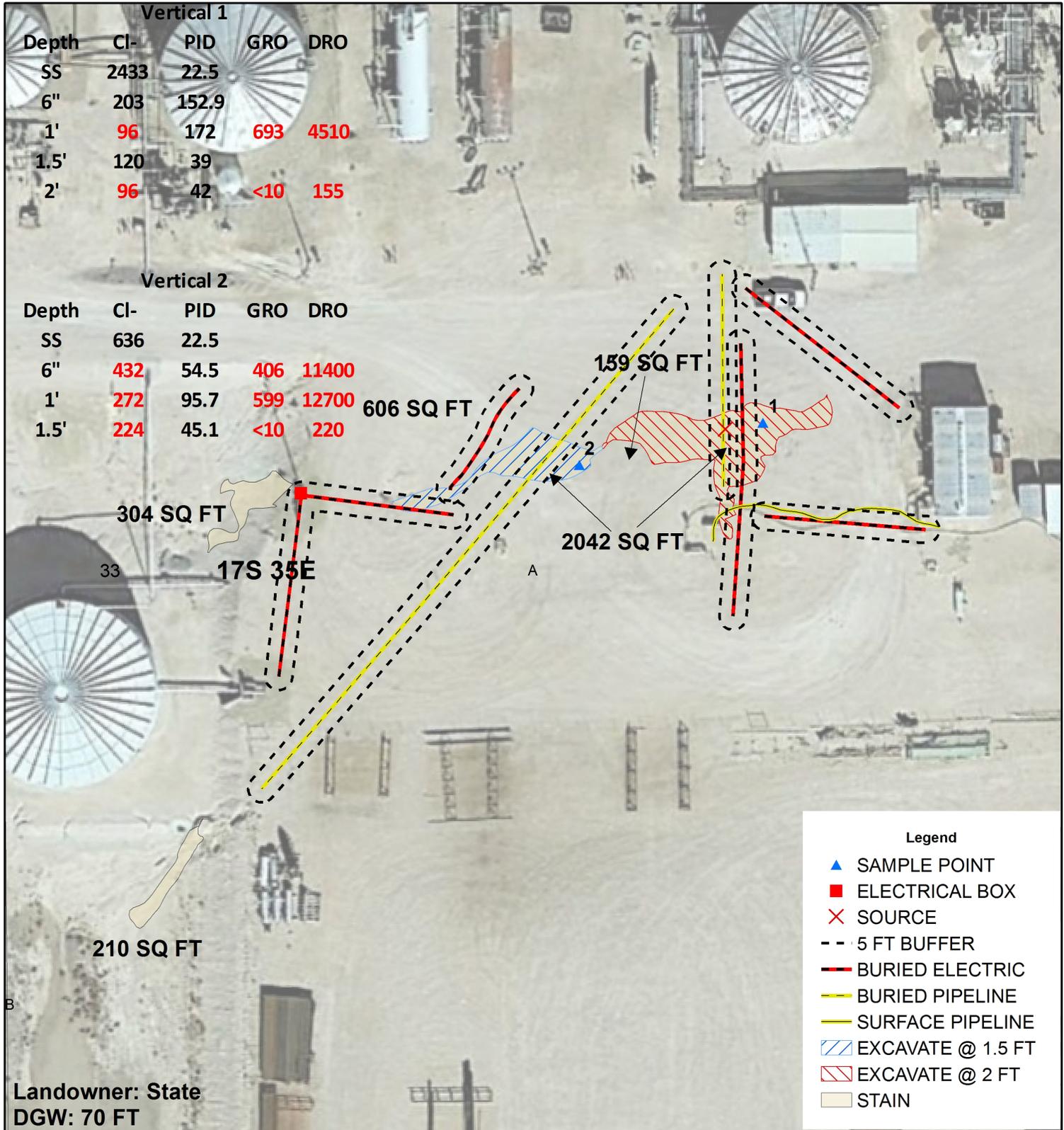
Attachments:

- Figure 1 – Initial sampling data
- Appendix A – Initial C-141
- Appendix B – Laboratory Analysis
- Appendix C – Photo Documentation

Figures

Basin Environmental Service Technologies, LLC
P.O. Box 2948, Hobbs, NM 88241
Phone 575.393.2967

Initial Sampling



Vertical 1

| Depth | Cl- | PID | GRO | DRO |
|-------|------|-------|-----|------|
| SS | 2433 | 22.5 | | |
| 6" | 203 | 152.9 | | |
| 1' | 96 | 172 | 693 | 4510 |
| 1.5' | 120 | 39 | | |
| 2' | 96 | 42 | <10 | 155 |

Vertical 2

| Depth | Cl- | PID | GRO | DRO |
|-------|-----|------|-----|-------|
| SS | 636 | 22.5 | | |
| 6" | 432 | 54.5 | 406 | 11400 |
| 1' | 272 | 95.7 | 599 | 12700 |
| 1.5' | 224 | 45.1 | <10 | 220 |

Legend

- ▲ SAMPLE POINT
- ELECTRICAL BOX
- × SOURCE
- - - 5 FT BUFFER
- BURIED ELECTRIC
- BURIED PIPELINE
- SURFACE PIPELINE
- ▨ EXCAVATE @ 1.5 FT
- ▩ EXCAVATE @ 2 FT
- STAIN

Landowner: State
DGW: 70 FT



CONOCOPHILLIPS EVGSAU CENTRAL TANK BATTERY

1RP-3670

UL A SECTION 33
T-17-S R-35-E
LEA COUNTY, NM

Underground facilities are spatially projected and need to be field verified.

GPS CENTER STAIN: 32.796222 -103.457763

0 25 50
Feet

GPS date: 6/16/15 CF
Drawing date: 6/17/15
Drafted by: T. Grieco

Appendix A

Intial C-141

Basin Environmental Service Technologies, LLC
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967

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

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

Form C-141
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

| | |
|--|-----------------------------------|
| Name of Company: ConocoPhillips | Contact: Jay Garcia |
| Address: 29 Vacuum Complex Lane | Telephone No. 575-704-2455 |
| Facility Name: EVGSAU CTB | Facility Type: Battery |

| | | |
|-----------------------------|----------------|-------------------------------|
| Surface Owner: NMOCD | Mineral Owner: | API No. 30-025-2667900 |
|-----------------------------|----------------|-------------------------------|

LOCATION OF RELEASE

| Unit Letter | Section | Township | Range | Feet from the | North/South Line | Feet from the | East/West Line | County |
|-------------|---------|----------|-------|---------------|------------------|---------------|----------------|--------|
| A | 33 | 17S | 35E | 250 | North | 150 | East | LEA |

Latitude 32.7979432251344 Longitude 103.454578927405

NATURE OF RELEASE

| | | |
|--|--|--|
| Type of Release: Leak | Volume of Release: 30 bbl. of oil | Volume Recovered: 20 bbl. of oil |
| Source of Release: Discharge Line | Date and Hour of Occurrence 06/12/2015 6:30 am | Date and Hour of Discovery 06/12/2015 6:30 am |
| Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required | If YES, To Whom? Tomas Oberding / Kellie Jones | |
| By Whom? Jay Garcia | Date and Hour: 06/12/2015 9:45 pm | |
| Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | If YES, Volume Impacting the Watercourse. | |

If a Watercourse was Impacted, Describe Fully.*

ENV – Agency Reportable – 30 bbls oil – EVGSAU CTB – RR II – MCBU – Buckeye – On Friday June 12, 2015 at 0630 MDT, at EVGSAU CTB, MSO found a leak on a 8 inch transfer line that resulted in a release of 30 bbls of oil, with 20 bbls recovered. Immediate action was to isolate the leak and turn in a work order for repair and remediation. The affected area will be remediated according to NMOCD, BLM and COPC guidelines. This is a Tier 2 PSE.

RECEIVED
By OCD District 1 at 2:05 pm, Jun 15, 2015

Describe Area Affected and Cleanup Action Taken.*

Release of 30 barrels of oil with 20 barrels of oil recovered. Affected area was 113 foot by 143 foot X 2 inch deep on caliche pad. The affected area will be remediated according to NMOCD guidelines.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

| | | |
|--|--|--|
| Signature: <i>Jay Garcia</i> | OIL CONSERVATION DIVISION | |
| Printed Name: Jay Garcia | Approved by Environmental Specialist: <i>[Signature]</i> | |
| Title: LEAD HSE | Approval Date: | Expiration Date: |
| E-mail Address: jay.c.garcia@conocophillips.com | Conditions of Approval: Site samples required. Delineate and remediate as per MNOCD guides. Geotag photographs of remediation required. | Attached <input type="checkbox"/> 217817 IRP-3670 |

nKJ1516650966
pKJ1516651415

Date: 01/06/2015

Phone:575-704-2455

* Attach Additional Sheets If Necessary

Appendix B

Laboratory Analysis

Basin Environmental Service Technologies, LLC
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967



May 23, 2016

KYLE NORMAN

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: EVGSAU CTB

Enclosed are the results of analyses for samples received by the laboratory on 05/20/16 14:30.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-15-7. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style.

Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

 Basin Environmental Service
 KYLE NORMAN
 P.O. Box 301
 Lovington NM, 88260
 Fax To: (575) 396-1429

| | | | |
|-------------------|------------|---------------------|-----------------|
| Received: | 05/20/2016 | Sampling Date: | 05/20/2016 |
| Reported: | 05/23/2016 | Sampling Type: | Soil |
| Project Name: | EVGSAU CTB | Sampling Condition: | ** (See Notes) |
| Project Number: | 1RP-3670 | Sample Received By: | Brittany Feller |
| Project Location: | NOT GIVEN | | |

Sample ID: PT. 1 @ 1' (H601109-01)

| Chloride, SM4500Cl-B | | mg/kg | | Analyzed By: AP | | | | | | |
|------------------------|-------------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| Chloride | 96.0 | 16.0 | 05/23/2016 | ND | 416 | 104 | 400 | 0.00 | | |
| TPH 8015M | | mg/kg | | Analyzed By: MS | | | | | | |
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| GRO C6-C10 | 693 | 10.0 | 05/20/2016 | ND | 193 | 96.3 | 200 | 1.82 | QM-07 | |
| DRO >C10-C28 | 4510 | 10.0 | 05/20/2016 | ND | 202 | 101 | 200 | 6.77 | QM-07 | |

Surrogate: 1-Chlorooctane 125 % 35-147

Surrogate: 1-Chlorooctadecane 156 % 28-171

Sample ID: PT. 1 @ 2' (H601109-02)

| Chloride, SM4500Cl-B | | mg/kg | | Analyzed By: AP | | | | | | |
|------------------------|-------------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| Chloride | 96.0 | 16.0 | 05/23/2016 | ND | 416 | 104 | 400 | 0.00 | | |
| TPH 8015M | | mg/kg | | Analyzed By: MS | | | | | | |
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| GRO C6-C10 | <10.0 | 10.0 | 05/20/2016 | ND | 193 | 96.3 | 200 | 1.82 | | |
| DRO >C10-C28 | 155 | 10.0 | 05/20/2016 | ND | 202 | 101 | 200 | 6.77 | | |

Surrogate: 1-Chlorooctane 79.8 % 35-147

Surrogate: 1-Chlorooctadecane 94.7 % 28-171

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

 Basin Environmental Service
 KYLE NORMAN
 P.O. Box 301
 Lovington NM, 88260
 Fax To: (575) 396-1429

 Received: 05/20/2016
 Reported: 05/23/2016
 Project Name: EVGSAU CTB
 Project Number: 1RP-3670
 Project Location: NOT GIVEN

 Sampling Date: 05/20/2016
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Brittany Feller

Sample ID: PT. 2 @ 6" (H601109-03)

| Chloride, SM4500Cl-B | | mg/kg | | Analyzed By: AP | | | | | | |
|------------------------|--------------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| Chloride | 432 | 16.0 | 05/23/2016 | ND | 416 | 104 | 400 | 0.00 | | |
| TPH 8015M | | mg/kg | | Analyzed By: MS | | | | | | S-06 |
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| GRO C6-C10 | 406 | 100 | 05/20/2016 | ND | 193 | 96.3 | 200 | 1.82 | | |
| DRO >C10-C28 | 11400 | 100 | 05/20/2016 | ND | 202 | 101 | 200 | 6.77 | | |

Surrogate: 1-Chlorooctane 135 % 35-147

Surrogate: 1-Chlorooctadecane 287 % 28-171

Sample ID: PT. 2 @ 1' (H601109-04)

| Chloride, SM4500Cl-B | | mg/kg | | Analyzed By: AP | | | | | | |
|------------------------|--------------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| Chloride | 272 | 16.0 | 05/23/2016 | ND | 416 | 104 | 400 | 0.00 | | |
| TPH 8015M | | mg/kg | | Analyzed By: MS | | | | | | S-06 |
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| GRO C6-C10 | 599 | 100 | 05/20/2016 | ND | 193 | 96.3 | 200 | 1.82 | | |
| DRO >C10-C28 | 12700 | 100 | 05/20/2016 | ND | 202 | 101 | 200 | 6.77 | | |

Surrogate: 1-Chlorooctane 160 % 35-147

Surrogate: 1-Chlorooctadecane 316 % 28-171

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

 Basin Environmental Service
 KYLE NORMAN
 P.O. Box 301
 Lovington NM, 88260
 Fax To: (575) 396-1429

 Received: 05/20/2016
 Reported: 05/23/2016
 Project Name: EVGSAU CTB
 Project Number: 1RP-3670
 Project Location: NOT GIVEN

 Sampling Date: 05/20/2016
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Brittany Feller

Sample ID: PT. 2 @ 1.5' (H601109-05)

| Chloride, SM4500Cl-B | | mg/kg | | Analyzed By: AP | | | | | |
|------------------------|------------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 224 | 16.0 | 05/23/2016 | ND | 416 | 104 | 400 | 0.00 | |
| TPH 8015M | | mg/kg | | Analyzed By: MS | | | | | |
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| GRO C6-C10 | <10.0 | 10.0 | 05/20/2016 | ND | 193 | 96.3 | 200 | 1.82 | |
| DRO >C10-C28 | 220 | 10.0 | 05/20/2016 | ND | 202 | 101 | 200 | 6.77 | |

Surrogate: 1-Chlorooctane 92.5 % 35-147

Surrogate: 1-Chlorooctadecane 118 % 28-171

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

- S-06 The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
- QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- ** Samples not received at proper temperature of 6°C or below.
- *** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report





ARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603
(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

RUSH

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

BILL TO

ANALYSIS REQUEST

Company Name: Conoco Phillips
Project Manager: Kyle Norman
Address:
City: State: Zip:
Phone #: Fax #:
Project #: Project Owner:
Project Name:
Project Location: EVGSAU CTB (1RP-3670)
Sampler Name: Kyle Norman

P.O. #:
Company: Basin Environmental
Attn:
Address: 419 W. Cain
City: Hobbs
State: NM Zip: 88240
Phone #:
Fax #:

| Lab I.D. | Sample I.D. | (G)RAB OR (C)OMP. | # CONTAINERS | MATRIX | | | | | | DATE | TIME | Chlorides | TPH 8015 M | BTEX | Texas TPH | Complete Cations/Anions | TDS |
|----------|-------------|-------------------|--------------|-------------------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|---------|-------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| | | | | GROUNDWATER | WASTEWATER | SOIL | OIL | SLUDGE | OTHER : | | | | | | | | |
| HU01109- | | | 1 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 5/20/16 | 08:30 | <input checked="" type="checkbox"/> |
| | 1 | | 1 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 5/20/16 | 08:40 | <input checked="" type="checkbox"/> |
| | 2 | | 1 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 5/20/16 | 09:00 | <input checked="" type="checkbox"/> |
| | 3 | | 1 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 5/20/16 | 09:15 | <input checked="" type="checkbox"/> |
| | 4 | | 1 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 5/20/16 | 09:40 | <input checked="" type="checkbox"/> |
| | 5 | | 1 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 5/20/16 | 09:40 | <input checked="" type="checkbox"/> |

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Relinquished By: *Kybell*
Date: *5-20-16*
Time: *8:30pm*
Received By: *Brett Young Fern*
Date: _____
Time: _____

Delivered By: (Circle One)
Sampler - UPS - Bus - Other: *8.20c*
Sample Condition: Cool Intact
Yes No
CHECKED BY: *BF*
REMARKS: *corrected 8:30c*

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476 *#54*

Appendix C

Photo Documentation

Basin Environmental Service Technologies, LLC
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967

Conoco Phillips EVGSAU CTB (1RP-3670)

Unit Letter A, Section 33, T17S, R35E



Initial release, facing south

6/16/2015



Initial release, facing east

6/16/2015



Initial release, facing north

6/16/2015



Initial release, facing west

6/16/2015



Initial release, facing south east

6/16/2015



Initial release, facing north west

6/16/2015



Excavating vertical 1 facing south west

5/20/2016