Incident ID	nCH1828942927
District RP	1RP-5234
Facility ID	fCH1828942393
Application ID	pCH1828943257

November 30, 2018

Christina Hernandez
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division, District 1
1625 French Drive
Hobbs, NM 88240

Yolanda Perez
United States Department of the Interior
Bureau of Land Management
620 E. Greene Street
Carlsbad, NM 88220

Re: **Site Assessment Report and Proposed Remediation Plan**
Site Name: Cotton Draw Pipeline
GPS: Latitude: 32.10952 Longitude: -103.71871
Legals: UL "N", Sec. 19, T25S, R32E
Lea County, New Mexico
NMOCD Ref. No. 1RP-5234

Lowry Environmental & Associates, LLC (LEA), on behalf of ETC Texas Pipeline, Ltd. , has prepared this Site Assessment Report and Proposed Remediation Plan for the Release Site known as the Cotton Draw Pipeline. Details of the release are summarized on the table below:

Nature and Volume of Release			
Date Release Discovered	8/24/2018	**Source of Release**	Pipeline
Type of Release	Natural Gas w/ Liquids	**Volume Released**	113.088 McF Gas, <5 bbls Liquid
		Volume Recovered	None
Cause of Release Failure of a segment of buried pipeline as a result of corrosion.			
Affected Area The release affected an area within a pipeline right-of-way measuring approximate 200 sq. ft.			
Was this a major release? No	**If YES, for what reasons (s) is this considered a major release?** N/A		
If Yes, was immediate notice given to the OCD? By whom? To whom? When and by what means? N/A			

A copy of the Release Notification (NMOCD Form C-141) is provided as Attachment #9.

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Site Assessment/Characterization	
What is the shallowest depth to groundwater beneath the area affected by the release?	>300'
Did this release impact groundwater or surface water?	No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	No
Are the lateral extents of the release within 300 feet of a wetland?	No
Are the lateral extents of the release overlying a subsurface mine?	No
Are the lateral extents of the release overlying an unstable area such as karst geology?	No
Are the lateral extents of the release within a 100-year floodplain?	No
Did the release impact areas **not** on an exploration, development, production or storage site?	Yes

A search of groundwater databases maintained by the New Mexico Office of the State Engineer (NMOSE) and United States Geological Survey was conducted in an effort to determine the average depth to groundwater within a 1 Mile radius of the Site and identify any registered water wells within a 1/2 Mile radius of the Site. If none where identified, or the results were inconclusive, the approximate depth to groundwater was extrapolated from available data including the Depth to Groundwater Map utilized by the NMOCD.

Based on the volume and nature of the release, inferred depth to groundwater and NMOCD Siting Criteria, the NMOCD Closure Criteria for the Site is as follows:

Closure Criteria for Soil Impacted by a Release	
Benzene	**10 mg/kg**
Benzene, Toluene, Ethylbenzene and Total Xylenes (BTEX)	**50 mg/kg**
Total Petroleum Hydrocarbons	**2,500 mg/kg**
Combined GRO and DRO	**1,000 mg/kg**
Chloride	**20,000 mg/kg**

NMOCD Siting Criteria data was gathered from available resources including Bureau of Land Management (BLM) shapefiles; topographic maps; NMOSE and USGS databases; and aerial imagery. The results are depicted on Figures 1 & 2. Depth to groundwater information is provided as Attachment #4. A Photographic Log is provided as Attachment #8.

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Facility ID	fCH1828942393
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INITIAL SITE ASSESSMENT

On **September 18, 2018,** an initial site assessment was conducted at the Site. During the initial site assessment, a test trench was advanced adjacent to the release point. During the advancement of the test trench, one (1) soil sample (V1 7') was collected and submitted to the laboratory for analysis of BTEX, TPH and chloride concentrations. Laboratory analytical results indicated BTEX, TPH and chloride concentrations were below the NMOCD Closure Criteria. In addition, four (4) test trenches were advanced at the inferred edges of the affected area. During the advancement of the test trenches, four (4) soil samples (H1 7', H2 7', H3 7' and H4 7') were collected and submitted to the laboratory for analysis of BTEX, TPH and chloride concentrations. Laboratory analytical results indicated BTEX, TPH and chloride concentrations were below the NMOCD Closure Criteria in each of the submitted soil samples.

On **November 16, 2018,** LEA revisited the Site in an effort to further characterize the affected area. During the site visit a hand-auger was utilized to collect five (5) soil samples (NW HA @ 5', NE HA @ 4', SW HA @ 4', SE HA @ 4' and VIB @ 5') from the affected area. Soil sample NW HA @ 5' was collected proximate to soil sample H1 7', soil sample NE HA @ 4' was collected proximate to soil sample H2 7', soil sample SW HA @ 4' was collected proximate to soil sample H3 7', soil sample SE HA @ 4' was collected proximate to soil sample H4 7', and soil sample V1B @ 5' was collected proximate to soil sample V1B @ 5'. The collected soil samples were submitted to and NMOCD-approved laboratory for analysis of BTEX, TPH and chloride concentrations. Laboratory analytical results indicated BTEX, TPH and chloride concentrations were less than the NMOCD Closure Criteria in each of the submitted soil samples.

A table summarizing laboratory analytical results from soil samples collected during the initial site assessment is provided below:

Concentrations of BTEX, TPH and/or Chloride in Soil

Sample ID	Date	Depth	Soil Status	SW 846 8021B		SW 846 8015M Ext.					E300/4500Cl
				Benzene (mg/kg)	BTEX (mg/kg)	GRO C_6-C_{10} (mg/kg)	DRO C_{10}-C_{28} (mg/kg)	GRO + DRO C_6-C_{28} (mg/kg)	ORO C_{28}-C_{36} (mg/kg)	TPH C_6-C_{36} (mg/kg)	Chloride (mg/kg)
V1 -7'	9/18/18	7'	In-Situ	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	3,240
H1-7'	9/18/18	7'	In-Situ	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	192
H2-7'	9/18/18	7'	In-Situ	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	4,120
H3-7'	9/18/18	7'	In-Situ	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	6,160
H4-7'	9/18/18	7'	In-Situ	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	208
NW HA @ 5'	11/16/18	5'	In-Situ	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	80.0
NE HA @ 4'	11/16/18	4'	In-Situ	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	400
SW HA @ 4'	11/16/18	4'	In-Situ	<0.050	12.9	84.8	394	478.8	<10.0	478.8	640
SE HA @ 4'	11/16/18	4'	In-Situ	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	32.0
V1B @ 5'	11/16/18	5'	In-Situ	<0.050	<0.300	<10.0	13.7	13.7	<10.0	13.7	176
Closure Criteria				**10**	**50**	**-**	**-**	**1,000**	**-**	**2,500**	**20,000**

A "Site & Sample Location Map" is provided as Attachment #3. Field Data, if applicable, is provided as Attachment #5. Soil profile observations are provided on Attachment #6. Laboratory analytical reports are provided as Attachment #7.

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PROPOSED REMEDIATION PLAN

Based on laboratory analytical results, site characteristics and field observations made during the initial site assessment, ETC Texas Pipeline, Ltd. proposes the following remediation activities designed to advance the Site toward an NMOCD and BLM approved closure:

•Utilizing mechanical equipment, excavate impacted soil within the release margins. The floor of the excavation will be advanced to approximately 4 ft. bgs, or until laboratory analytical results indicate concentrations of BTEX, TPH and chloride concentrations are below NMOCD Closure Criteria, whichever is more.
•The sidewalls of the excavation will be advanced horizontally until laboratory analytical results from confirmation soil samples indicate BTEX, TPH and chloride concentrations are below the NMOCD Closure Criteria.
•The upper 4 ft. of the sidewalls of the excavation will be advanced horizontally until laboratory analytical results from confirmation soil samples indicate concentrations of benzene are below 10 mg/kg, concentrations of BTEX are below 50 mg/kg, concentrations of TPH are below 100 mg/kg and concentrations of chloride are below 600 mg/kg.
• Excavated soil will be temporarily stockpiled on-site, pending transportation under manifest to an NMOCD-approved disposal facility.
• Upon receiving favorable laboratory analytical results from confirmation soil samples (below the NMOCD Closure Criteria) excavated areas will be backfilled with locally sourced, non-impacted "like" material. Excavation backfill will be placed at or near original relative positions. The affected area will be contoured and/or compacted to achieve erosion control, stability and preservation of surface water flow to the extent practicable.

SAMPLING PLAN

Upon completion of excavation activities, representative five-point composite excavation confirmation soil samples will be collected from the excavation sidewalls in each cardinal direction, representing no more than **50 linear ft**. A minimum of **one (1)** representative five-point composite excavation confirmation soil sample will be collected from the base of the excavated area representing every **200 square feet**. Additional, "discrete" confirmation soil samples will be collected from wet or visibly stained areas inferred to have been affected by the release, as necessary. Excavation confirmation soil samples will be analyzed for constituents of concern present above the NMOCD Closure Criteria as determined during the Initial Site Assessment.

TIMELINE AND ESTIMATED VOLUME OF SOIL TO BE REMEDIATED

Remediation activities are expected to be completed **within 90 days** of receiving necessary approval(s) of this *Site Assessment Summary and Proposed Remediation Plan*. Based on laboratory analytical results, site characteristics and field observations made during the initial site assessment it is estimated that approximately **300 cubic yards** of soil will be excavated and transported off-site.

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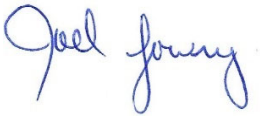
RESTORATION, RECLAMATION AND RE-VEGETATION PLAN

Areas affected by remediation and closure activities will be substantially restored to the condition that existed prior to the release, to the extent practicable. Excavated areas will be backfilled with locally sourced, non-impacted "like" material placed at or near original relative positions. The affected area will be contoured and/or compacted to achieve erosion control, stability and preservation of surface water flow to the extent practicable. The affected area will be reseeded with a BLM-approved seed mixture during the first favorable growing season following closure of the Site.

If you have any questions, or need any additional information, please feel free to contact Dean Ericson or the undersigned by phone or email.

Respectfully,



Joel W. Lowry
Environmental Professional
Lowry Environmental & Associates, LLC

Attachments:
Attachment #1- Figure 1 - Topographic Map
Attachment #2- Figure 2 - Aerial Map
Attachment #3- Figure 3 - Site & Sample Location Map
Attachment #4- Depth to Groundwater Information
Attachment #5 Field Data
Attachment #6- Soil Profile
Attachment #7- Laboratory Analytical Reports
Attachment #8- Photographic Log
Attachment #9- Release Notification (FORM C-141)

LIMITATIONS

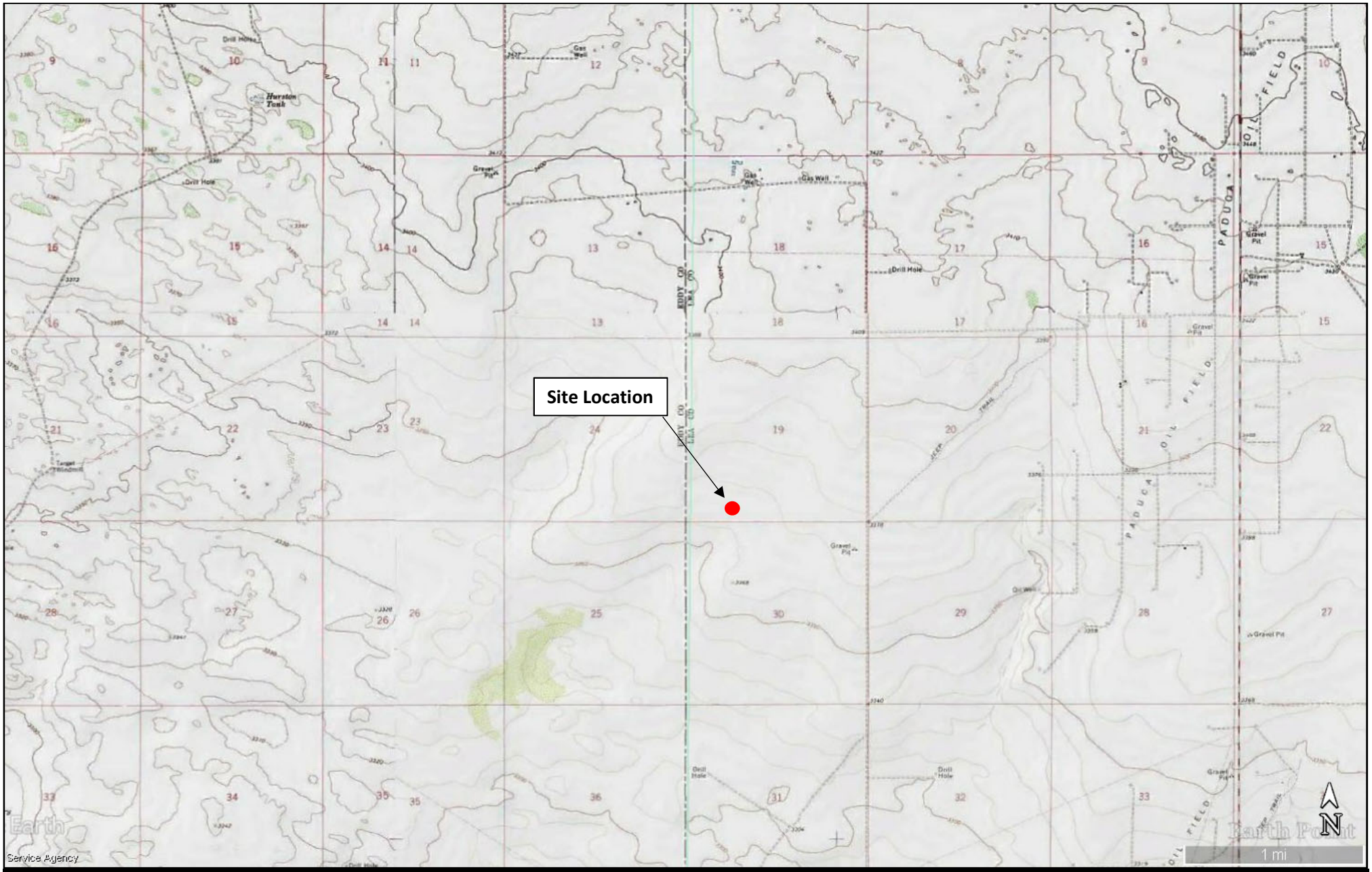
This document has been prepared on behalf of ETC Texas Pipeline, Ltd. . Use of information contained in this report, including exhibits and attachments, by any other party without the consent of LEA and/or ETC Texas Pipeline, Ltd. is prohibited.

This document has been prepared in a professional manner, using the degree of skill and care exercised by similar environmental professionals. LEA notes that the facts and conditions referenced in this document may change over time and that the conclusions and recommendations are only applicable to the facts and conditions as described at the time this document was prepared.

LEA has prepared this report to the best of its ability. No other warranty, expressed or implied, is made or intended.

ATTACHMENT #1

Figure 1 - Topographic Map



LEGEND:

- Site Location

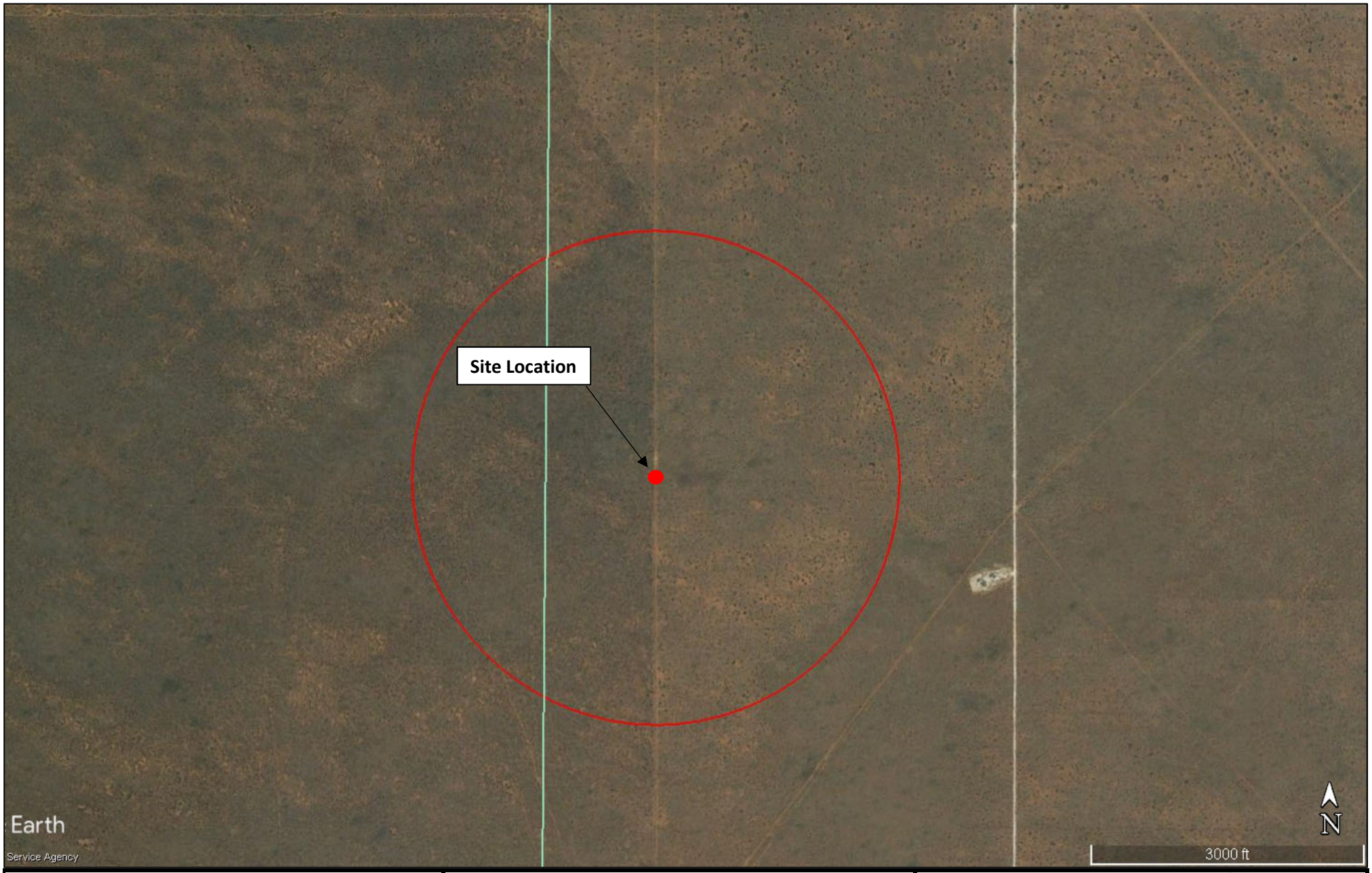
Figure 1
Topographic Map
ETC Texas Pipeline, Ltd.
Cotton Draw Pipeline
GPS: 32.10952, -103.71871
Lea County, New Mexico

LOWRY environmental

Drafted by: jwl Checked by: client Date: 11/30/2018

ATTACHMENT #2

Figure 2 - Aerial Map



LEGEND:

- Site Location
- Fresh Water Well
- 100-Year Floodplain
- High/Critical Karst
- Non-Inustrial Building
- Subsurface Mine
- 1/2 Mile Radius

Figure 2

Aerial Map

ETC Texas Pipeline, Ltd.

Cotton Draw Pipeline

GPS: 32.10952, -103.71871

Lea County, New Mexico

LOWRY environmental

Drafted by: jwl Checked by: client Date: 11/30/2018

ATTACHMENT #3

Figure 3 - Site & Sample Location Map

LEGEND:

- Sample Location
- Affected Area
- Test Trench
- Pipeline

Figure 3

Site & Sample Location Map

ETC Texas Pipeline, Ltd.

Cotton Draw Pipeline

GPS: 32.10952, -103.71871

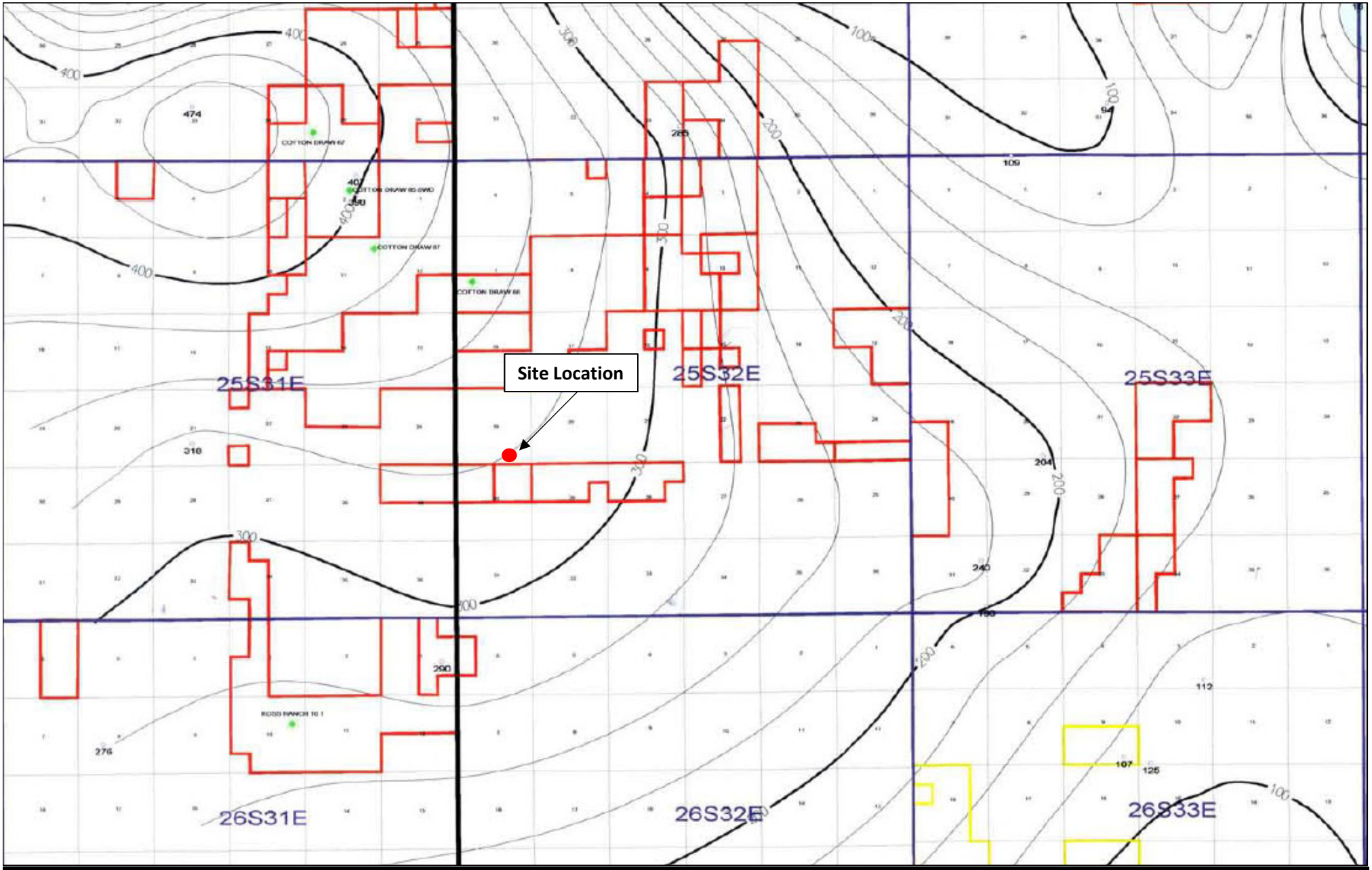
Lea County, New Mexico

LOWRY environmental

Drafted by: jwl Checked by: client Date: 11/30/2018

ATTACHMENT #4

Depth to Groundwater Information



LEGEND:

- Site Location

Figure 4

Inferred Depth to Groundwater Trend Map

ETC Texas Pipeline, Ltd.

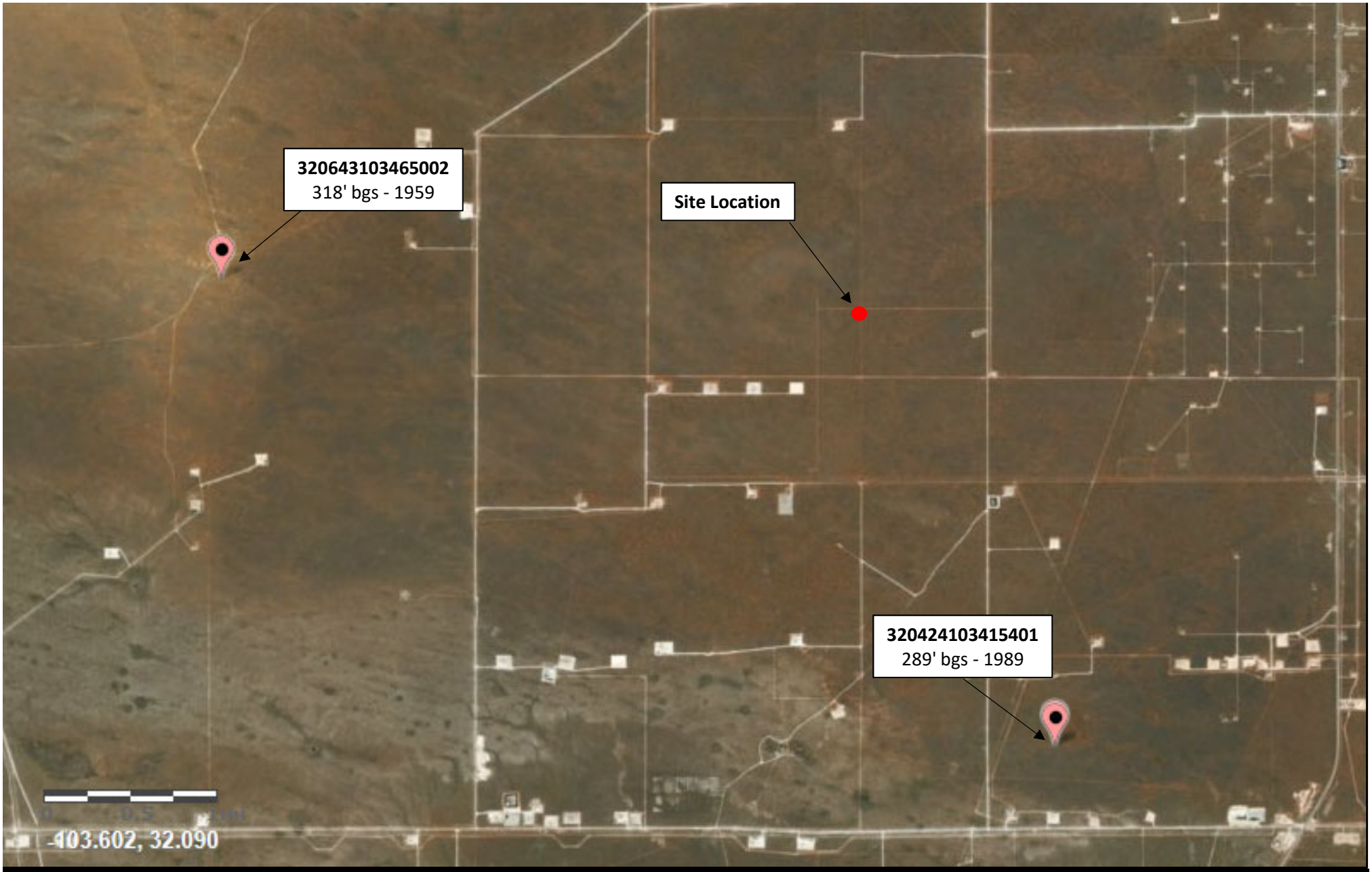
Cotton Draw Pipeline

GPS: 32.10952, -103.71871

Lea County, New Mexico

LOWRY environmental

Drafted by: jwl Checked by: client Date: 11/30/2018



LEGEND:

- Site Location

Figure 5

USGS Well Proximity Map
ETC Texas Pipeline, Ltd.
Cotton Draw Pipeline
GPS: 32.10952, -103.71871
Lea County, New Mexico

LOWRY environmental

Drafted by: jwl Checked by: client Date: 11/30/2018

New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(quarters are 1=NW 2=NE 3=SW 4=SE)
(quarters are smallest to largest) (NAD83 UTM in meters)

No records found.

UTMNAD83 Radius Search (in meters):

Easting (X): 620884 **Northing (Y):** 3553293.7 **Radius:** 1610

National Water Information System: Web Interface

Click to hideNews Bulletins

- Please see news on new formats
- **UPDATE, 11/6: The USGS continues to make progress on restoring all of its gages. Less than 1 percent of USGS streamgages are still not transmitting due to an issue with the satellite telemetry system that records and transmits data. Once all operational gages are brought back online, the USGS will focus on restoring other equipment that experienced the telemetry issues, including about 85 rapid deployment gages that are used periodically for emergency response. Read more**
- Full News

Groundwater levels for the Nation

Search Results -- 1 sites found

site_no list =

- 320643103465002

Minimum number of levels = 1

Save file of selected sites to local disk for future upload

USGS 320643103465002 25S.31E.21.413314A

Available data for this site Groundwater: Field measurements | GO

Eddy County, New Mexico
Hydrologic Unit Code 13070001
Latitude 32°06'46.0", Longitude 103°46'56.3" NAD83
Land-surface elevation 3,374.00 feet above NGVD29
The depth of the well is 400 feet below land surface.
This well is completed in the Alluvium, Bolson Deposits and Other Surface Deposits (110AVMB) local aquifer.

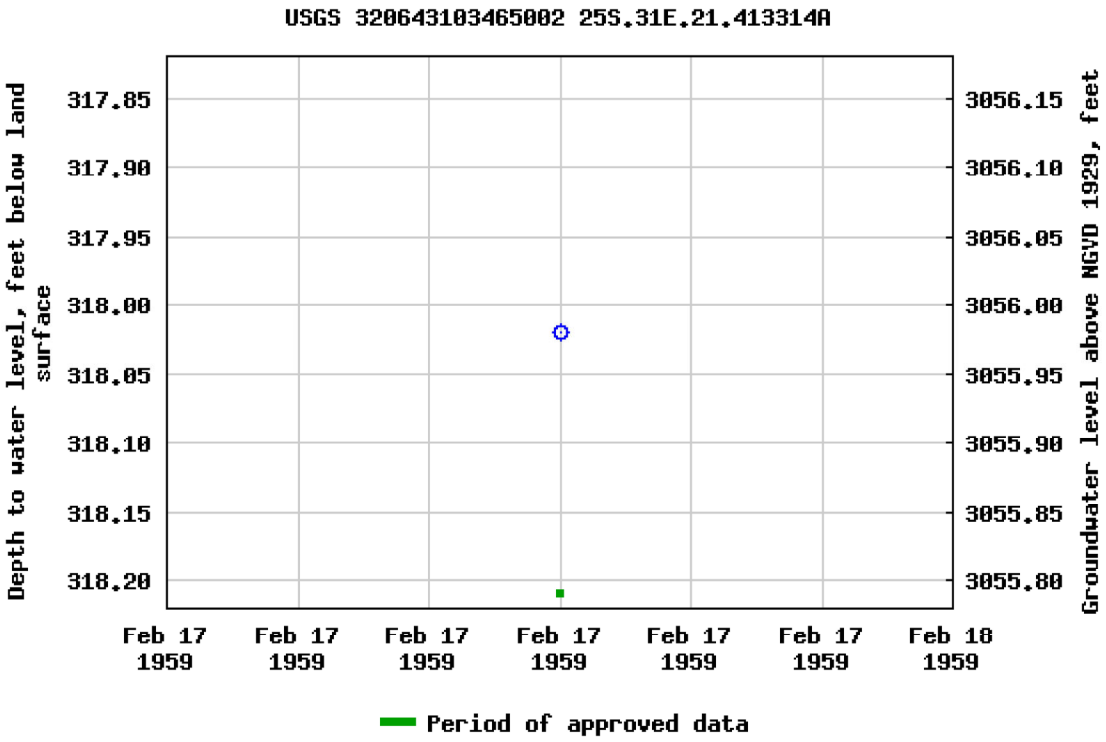
Output formats

Table of data

Tab-separated data

Graph of data

Reselect period



Breaks in the plot represent a gap of at least one year between field measurements.
Download a presentation-quality graph

Questions about sites/data?
Feedback on this web site
Automated retrievals
Help
Data Tips
Explanation of terms
Subscribe for system changes
News

National Water Information System: Web Interface

Click to hideNews Bulletins

- Please see news on new formats
- **UPDATE, 11/6: The USGS continues to make progress on restoring all of its gages. Less than 1 percent of USGS streamgages are still not transmitting due to an issue with the satellite telemetry system that records and transmits data. Once all operational gages are brought back online, the USGS will focus on restoring other equipment that experienced the telemetry issues, including about 85 rapid deployment gages that are used periodically for emergency response. Read more**
- Full News

Groundwater levels for the Nation

Search Results -- 1 sites found

site_no list =

- 320424103415401

Minimum number of levels = 1

Save file of selected sites to local disk for future upload

USGS 320424103415401 26S.31E.01.421322

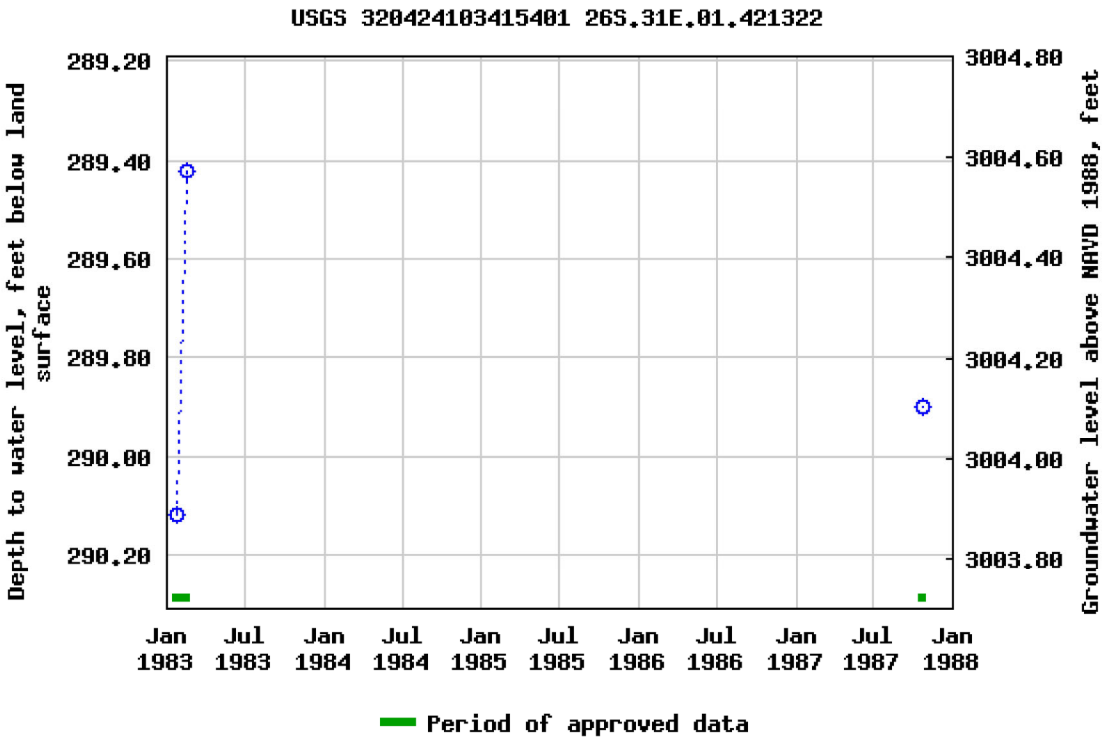
Available data for this site Groundwater: Field measurements | GO

Eddy County, New Mexico
Hydrologic Unit Code --
Latitude 32°04'24", Longitude 103°41'54" NAD27
Land-surface elevation 3,294 feet above NAVD88
This well is completed in the Santa Rosa Sandstone (231SNRS) local aquifer.

Output formats

Table of data
Tab-separated data

Graph of data
Reselect period



Breaks in the plot represent a gap of at least one year between field measurements.
Download a presentation-quality graph

Questions about sites/data?
Feedback on this web site
Automated retrievals
Help
Data Tips
Explanation of terms
Subscribe for system changes
News

Accessibility Plug-Ins FOIA Privacy Policies and Notices

U.S. Department of the Interior | U.S. Geological Survey

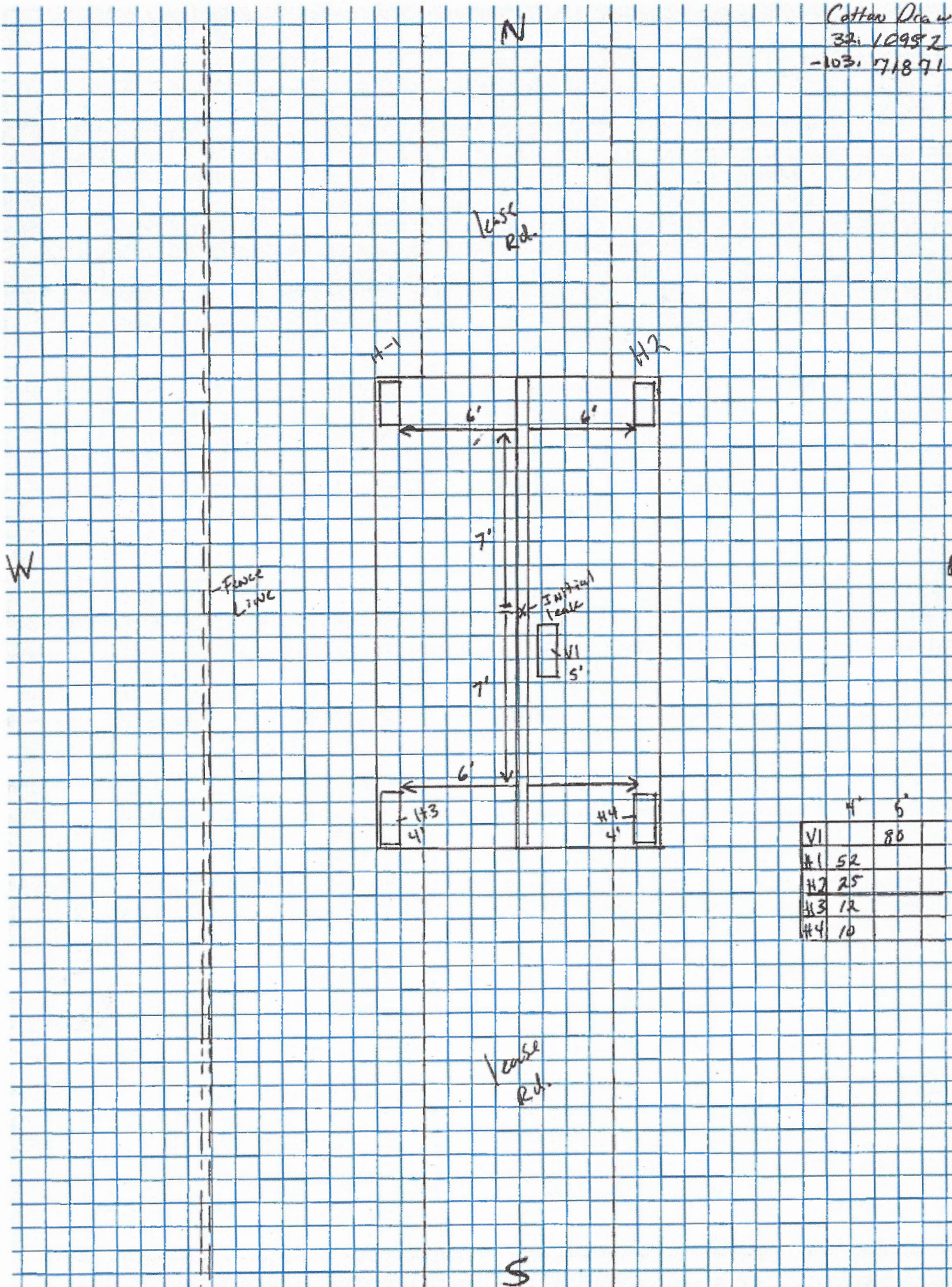
Title: Groundwater for USA: Water Levels
URL: https://nwis.waterdata.usgs.gov/nwis/gwlevels?

Page Contact Information: USGS Water Data Support Team
Page Last Modified: 2018-11-09 13:48:21 EST
1.27 1.13 nadww01

ATTACHMENT #5

Field Data

Cotton Draw 10"
32.10952
-103.71871

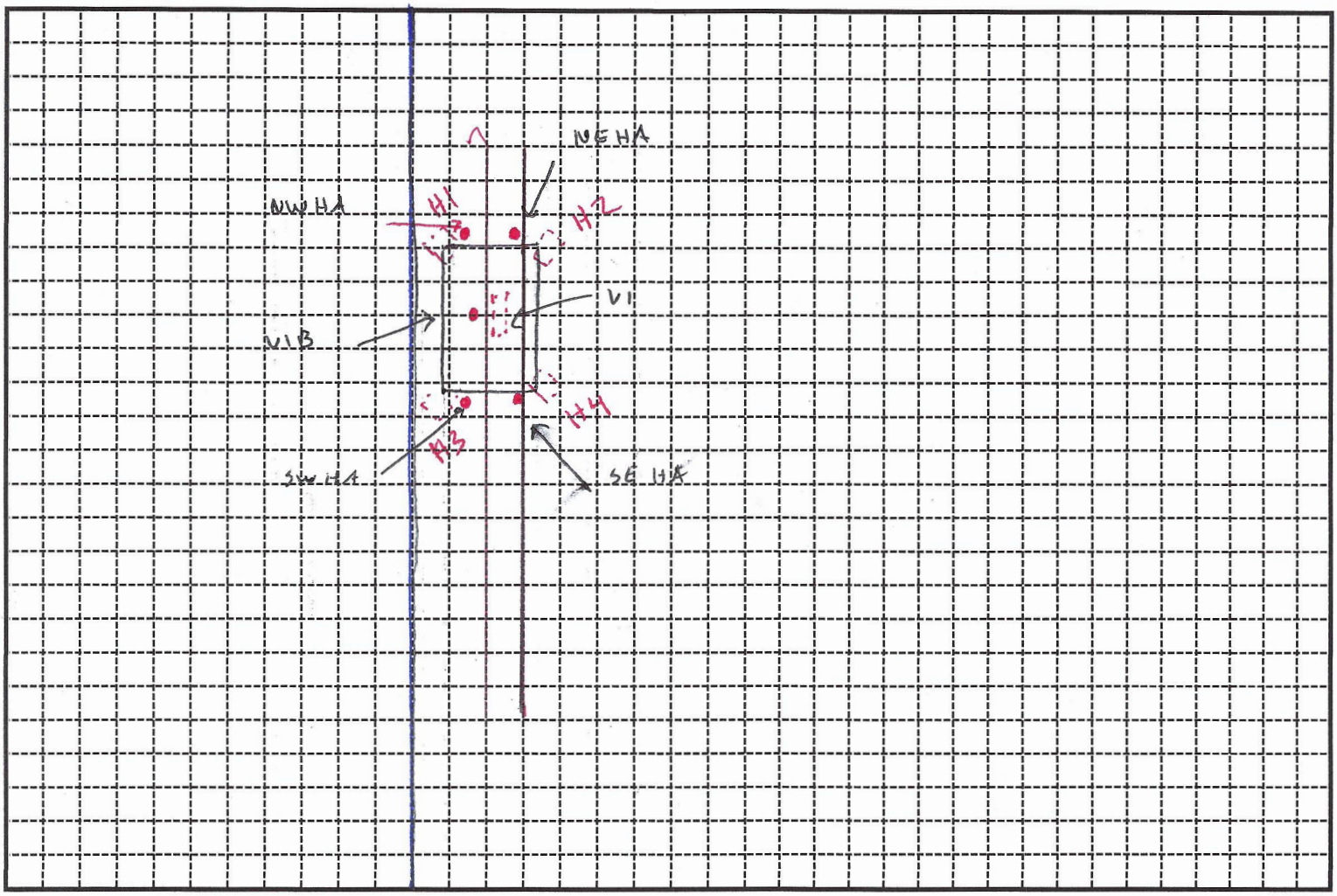


	4"	5"	
VI		80	
#1	52		
#2	25		
#3	12		
#4	10		

FIELD NOTES

Site Name: Cotton Draw 10"

Date: 11/16/2018



Field ID	Odor/PID	Chloride
NW HA @ 5'	None	1170
NE HA @ 4'	None	362
SW HA @ 4'	Slight	580
SE HA @ 4'	None	1170
V1b @ 5'	None	1120

Field ID	Odor/PID	Chloride

Field ID	Odor/PID	Chloride

Field ID	Odor/PID	Chloride

Field ID	Odor/PID	Chloride

Field ID	Odor/PID	Chloride

ATTACHMENT #6

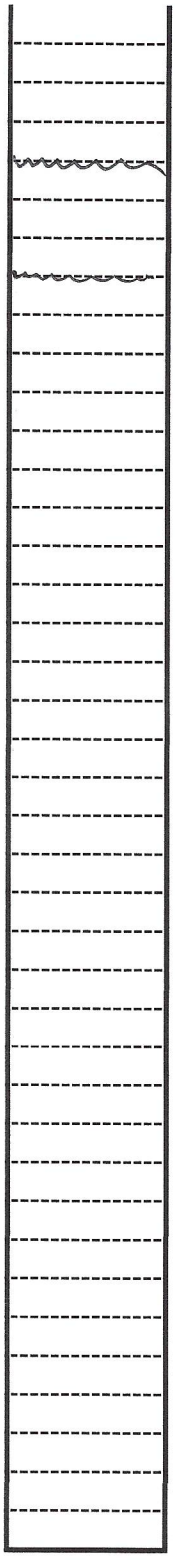
Soil Profile

SOIL PROFILE

Site Name: Cotton Draw 10"

Date: 11/16/2018

Description	Depth (ft. bgs)
Red Sand	1–3
Broken Caliche	4–6
Caliche	7 TD



ATTACHMENT #7

Laboratory Analytical Reports

CARDINAL Laboratories

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

September 20, 2018

DEAN ERICSON

ENERGY TRANSFER

P. O. BOX 1226

JAL, NM 88252

RE: COTTON DRAW

Enclosed are the results of analyses for samples received by the laboratory on 09/19/18 8:25.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-18-11. 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 accreditated 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,

Celey D. Keene

Celey D. Keene

Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

ENERGY TRANSFER
DEAN ERICSON
P. O. BOX 1226
JAL NM, 88252
Fax To:

Received:	09/19/2018	Sampling Date:	09/18/2018
Reported:	09/20/2018	Sampling Type:	Soil
Project Name:	COTTON DRAW	Sampling Condition:	Cool & Intact
Project Number:	10 INCH / 32.10952-103.71871	Sample Received By:	Tamara Oldaker
Project Location:	NONE GIVEN		

Sample ID: V1 - 7' (H802632-01)

BTEX 8021B mg/kg Analyzed By: ms

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/19/2018	ND	2.00	100	2.00	1.48	
Toluene*	<0.050	0.050	09/19/2018	ND	1.93	96.5	2.00	1.30	
Ethylbenzene*	<0.050	0.050	09/19/2018	ND	1.95	97.4	2.00	2.17	
Total Xylenes*	<0.150	0.150	09/19/2018	ND	5.90	98.3	6.00	2.10	
Total BTEX	<0.300	0.300	09/19/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID *84.9 %* *69.8-142*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**3240**	16.0	09/19/2018	ND	400	100	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	09/19/2018	ND	237	119	200	1.42	
DRO >C10-C28*	<10.0	10.0	09/19/2018	ND	208	104	200	1.03	
EXT DRO >C28-C36	<10.0	10.0	09/19/2018	ND					

Surrogate: 1-Chlorooctane *81.1 %* *41-142*

Surrogate: 1-Chlorooctadecane *84.4 %* *37.6-147*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

ENERGY TRANSFER
DEAN ERICSON
P. O. BOX 1226
JAL NM, 88252
Fax To:

Received:	09/19/2018	Sampling Date:	09/18/2018
Reported:	09/20/2018	Sampling Type:	Soil
Project Name:	COTTON DRAW	Sampling Condition:	Cool & Intact
Project Number:	10 INCH / 32.10952-103.71871	Sample Received By:	Tamara Oldaker
Project Location:	NONE GIVEN		

Sample ID: H1 - 7' (H802632-02)

BTEX 8021B mg/kg Analyzed By: ms

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/19/2018	ND	2.00	100	2.00	1.48	
Toluene*	<0.050	0.050	09/19/2018	ND	1.93	96.5	2.00	1.30	
Ethylbenzene*	<0.050	0.050	09/19/2018	ND	1.95	97.4	2.00	2.17	
Total Xylenes*	<0.150	0.150	09/19/2018	ND	5.90	98.3	6.00	2.10	
Total BTEX	<0.300	0.300	09/19/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID *87.0 %* *69.8-142*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**192**	16.0	09/19/2018	ND	400	100	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	09/19/2018	ND	237	119	200	1.42	
DRO >C10-C28*	<10.0	10.0	09/19/2018	ND	208	104	200	1.03	
EXT DRO >C28-C36	<10.0	10.0	09/19/2018	ND					

Surrogate: 1-Chlorooctane *87.1 %* *41-142*

Surrogate: 1-Chlorooctadecane *91.2 %* *37.6-147*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

ENERGY TRANSFER
DEAN ERICSON
P. O. BOX 1226
JAL NM, 88252
Fax To:

Received:	09/19/2018	Sampling Date:	09/18/2018
Reported:	09/20/2018	Sampling Type:	Soil
Project Name:	COTTON DRAW	Sampling Condition:	Cool & Intact
Project Number:	10 INCH / 32.10952-103.71871	Sample Received By:	Tamara Oldaker
Project Location:	NONE GIVEN		

Sample ID: H2 - 7' (H802632-03)

BTEX 8021B mg/kg **Analyzed By: ms**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/19/2018	ND	2.00	100	2.00	1.48	
Toluene*	<0.050	0.050	09/19/2018	ND	1.93	96.5	2.00	1.30	
Ethylbenzene*	<0.050	0.050	09/19/2018	ND	1.95	97.4	2.00	2.17	
Total Xylenes*	<0.150	0.150	09/19/2018	ND	5.90	98.3	6.00	2.10	
Total BTEX	<0.300	0.300	09/19/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID *86.7 %* *69.8-142*

Chloride, SM4500Cl-B mg/kg **Analyzed By: AC**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**4120**	16.0	09/19/2018	ND	416	104	400	8.00	QM-07

TPH 8015M mg/kg **Analyzed By: MS**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/19/2018	ND	237	119	200	1.42	
DRO >C10-C28*	<10.0	10.0	09/19/2018	ND	208	104	200	1.03	
EXT DRO >C28-C36	<10.0	10.0	09/19/2018	ND					

Surrogate: 1-Chlorooctane *87.4 %* *41-142*

Surrogate: 1-Chlorooctadecane *92.8 %* *37.6-147*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

ENERGY TRANSFER
DEAN ERICSON
P. O. BOX 1226
JAL NM, 88252
Fax To:

Received:	09/19/2018	Sampling Date:	09/18/2018
Reported:	09/20/2018	Sampling Type:	Soil
Project Name:	COTTON DRAW	Sampling Condition:	Cool & Intact
Project Number:	10 INCH / 32.10952-103.71871	Sample Received By:	Tamara Oldaker
Project Location:	NONE GIVEN		

Sample ID: H3 - 7' (H802632-04)

BTEX 8021B mg/kg **Analyzed By: ms**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/19/2018	ND	2.00	100	2.00	1.48	
Toluene*	<0.050	0.050	09/19/2018	ND	1.93	96.5	2.00	1.30	
Ethylbenzene*	<0.050	0.050	09/19/2018	ND	1.95	97.4	2.00	2.17	
Total Xylenes*	<0.150	0.150	09/19/2018	ND	5.90	98.3	6.00	2.10	
Total BTEX	<0.300	0.300	09/19/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID *86.4 %* *69.8-142*

Chloride, SM4500Cl-B mg/kg **Analyzed By: AC**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**6160**	16.0	09/19/2018	ND	416	104	400	8.00	

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	09/19/2018	ND	237	119	200	1.42	
DRO >C10-C28*	<10.0	10.0	09/19/2018	ND	208	104	200	1.03	
EXT DRO >C28-C36	<10.0	10.0	09/19/2018	ND					

Surrogate: 1-Chlorooctane *67.1 %* *41-142*

Surrogate: 1-Chlorooctadecane *71.7 %* *37.6-147*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

ENERGY TRANSFER
DEAN ERICSON
P. O. BOX 1226
JAL NM, 88252
Fax To:

Received:	09/19/2018	Sampling Date:	09/18/2018
Reported:	09/20/2018	Sampling Type:	Soil
Project Name:	COTTON DRAW	Sampling Condition:	Cool & Intact
Project Number:	10 INCH / 32.10952-103.71871	Sample Received By:	Tamara Oldaker
Project Location:	NONE GIVEN		

Sample ID: H4 - 7' (H802632-05)

BTEX 8021B mg/kg **Analyzed By: ms**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/19/2018	ND	2.00	100	2.00	1.48	
Toluene*	<0.050	0.050	09/19/2018	ND	1.93	96.5	2.00	1.30	
Ethylbenzene*	<0.050	0.050	09/19/2018	ND	1.95	97.4	2.00	2.17	
Total Xylenes*	<0.150	0.150	09/19/2018	ND	5.90	98.3	6.00	2.10	
Total BTEX	<0.300	0.300	09/19/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID *87.1 %* *69.8-142*

Chloride, SM4500Cl-B mg/kg **Analyzed By: AC**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**208**	16.0	09/19/2018	ND	416	104	400	8.00	

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	09/19/2018	ND	237	119	200	1.42	
DRO >C10-C28*	<10.0	10.0	09/19/2018	ND	208	104	200	1.03	
EXT DRO >C28-C36	<10.0	10.0	09/19/2018	ND					

Surrogate: 1-Chlorooctane *87.5 %* *41-142*

Surrogate: 1-Chlorooctadecane *91.1 %* *37.6-147*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Notes and Definitions

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

Cardinal Laboratories

*=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name:	ETC	**BILL TO**	
Project Manager:	Dean Erickson	P.O. #:	
Address:		Company:	
City:	State: Zip:	Attn:	
Phone #:	Fax #:	Address:	
Project #:	Project Owner:	City:	
Project Name:	Cotton Draw 10"	State: Zip:	
Project Location:	32.10952, -103.71871	Phone #:	
Sampler Name:	Michael Bell	Fax #:	

FOR LAB USE ONLY				MATRIX							PRESERV.			SAMPLING		ANALYSIS REQUEST		
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME	B-TEX	TPH	CL
H862632																	
1	V1 - 7'	G	1			✓					✓		9-18-18	5:00 PM	✓	✓	✓
2	H1 - 7'	G	1			✓					✓		9-18-18	5:00 PM	✓	✓	✓
3	H2 - 7'	G	1			✓					✓		9-18-18	5:00 PM	✓	✓	✓
4	H3 - 7'	G	1			✓					✓		9-18-18	5:00 PM	✓	✓	✓
5	H4 - 7'	G	1			✓					✓		9-18-18	5:00 PM	✓	✓	✓

Relinquished By: Michael Bell	Date: 9-19-18 Time: 9:20 AM	Received By:	Phone Result: ☐ Yes ☐ No	Add'l Phone #:
Relinquished By: Michael Bell	Date: 9-19-18 Time: 8:25	Received By: Tamara Oldaker	Fax Result: ☐ Yes ☐ No	Add'l Fax #:
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	0.4c #97	Sample Condition Cool: ☑ Yes ☐ No Intact: ☑ Yes ☐ No	CHECKED BY: (Initials) TO	REMARKS: Rush

† Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326

CARDINAL Laboratories

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

November 27, 2018

JOEL LOWRY

ENERGY TRANSFER

P. O. BOX 1226

JAL, NM 88252

RE: COTTON DRAW 10"

Enclosed are the results of analyses for samples received by the laboratory on 11/20/18 10:25.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-18-11. 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 accreditated 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,

Celey D. Keene

Celey D. Keene

Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

ENERGY TRANSFER
JOEL LOWRY
P. O. BOX 1226
JAL NM, 88252
Fax To:

Received:	11/20/2018	Sampling Date:	11/16/2018
Reported:	11/27/2018	Sampling Type:	Soil
Project Name:	COTTON DRAW 10"	Sampling Condition:	Cool & Intact
Project Number:	LEA CO NM	Sample Received By:	Jodi Henson
Project Location:	NONE GIVEN		

Sample ID: NW HA @ 5' (H803387-01)

BTEX 8021B mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	11/25/2018	ND	2.15	108	2.00	2.25	
Toluene*	<0.050	0.050	11/25/2018	ND	2.07	103	2.00	0.874	
Ethylbenzene*	<0.050	0.050	11/25/2018	ND	2.01	100	2.00	1.42	
Total Xylenes*	<0.150	0.150	11/25/2018	ND	5.90	98.4	6.00	1.89	
Total BTEX	<0.300	0.300	11/25/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID *96.8 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**80.0**	16.0	11/25/2018	ND	400	100	400	3.92	

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	11/21/2018	ND	191	95.5	200	1.02	
DRO >C10-C28*	<10.0	10.0	11/21/2018	ND	209	105	200	2.15	
EXT DRO >C28-C36	<10.0	10.0	11/21/2018	ND					

Surrogate: 1-Chlorooctane *81.3 %* *41-142*

Surrogate: 1-Chlorooctadecane *84.3 %* *37.6-147*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

ENERGY TRANSFER
JOEL LOWRY
P. O. BOX 1226
JAL NM, 88252
Fax To:

Received:	11/20/2018	Sampling Date:	11/16/2018
Reported:	11/27/2018	Sampling Type:	Soil
Project Name:	COTTON DRAW 10"	Sampling Condition:	Cool & Intact
Project Number:	LEA CO NM	Sample Received By:	Jodi Henson
Project Location:	NONE GIVEN		

Sample ID: NE HA @ 4' (H803387-02)

BTEX 8021B mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	11/25/2018	ND	2.15	108	2.00	2.25	
Toluene*	<0.050	0.050	11/25/2018	ND	2.07	103	2.00	0.874	
Ethylbenzene*	<0.050	0.050	11/25/2018	ND	2.01	100	2.00	1.42	
Total Xylenes*	<0.150	0.150	11/25/2018	ND	5.90	98.4	6.00	1.89	
Total BTEX	<0.300	0.300	11/25/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID *97.3 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**400**	16.0	11/25/2018	ND	432	108	400	0.00	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	11/22/2018	ND	191	95.5	200	1.02	
DRO >C10-C28*	<10.0	10.0	11/22/2018	ND	209	105	200	2.15	
EXT DRO >C28-C36	<10.0	10.0	11/22/2018	ND					

Surrogate: 1-Chlorooctane *85.7 %* *41-142*

Surrogate: 1-Chlorooctadecane *80.6 %* *37.6-147*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

ENERGY TRANSFER
JOEL LOWRY
P. O. BOX 1226
JAL NM, 88252
Fax To:

Received:	11/20/2018	Sampling Date:	11/16/2018
Reported:	11/27/2018	Sampling Type:	Soil
Project Name:	COTTON DRAW 10"	Sampling Condition:	Cool & Intact
Project Number:	LEA CO NM	Sample Received By:	Jodi Henson
Project Location:	NONE GIVEN		

Sample ID: SW HA @ 4' (H803387-03)

BTEX 8021B mg/kg Analyzed By: MS S-04

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	11/25/2018	ND	2.15	108	2.00	2.25	
Toluene*	<0.050	0.050	11/25/2018	ND	2.07	103	2.00	0.874	
Ethylbenzene*	<0.050	0.050	11/25/2018	ND	2.01	100	2.00	1.42	
Total Xylenes*	**12.9**	0.150	11/25/2018	ND	5.90	98.4	6.00	1.89	
Total BTEX	**12.9**	0.300	11/25/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID *218 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**640**	16.0	11/25/2018	ND	432	108	400	0.00	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	**84.8**	10.0	11/22/2018	ND	191	95.5	200	1.02	
DRO >C10-C28*	**394**	10.0	11/22/2018	ND	209	105	200	2.15	
EXT DRO >C28-C36	<10.0	10.0	11/22/2018	ND					

Surrogate: 1-Chlorooctane *97.2 %* *41-142*

Surrogate: 1-Chlorooctadecane *98.3 %* *37.6-147*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

ENERGY TRANSFER
JOEL LOWRY
P. O. BOX 1226
JAL NM, 88252
Fax To:

Received:	11/20/2018	Sampling Date:	11/16/2018
Reported:	11/27/2018	Sampling Type:	Soil
Project Name:	COTTON DRAW 10"	Sampling Condition:	Cool & Intact
Project Number:	LEA CO NM	Sample Received By:	Jodi Henson
Project Location:	NONE GIVEN		

Sample ID: SE HA @ 4' (H803387-04)

BTEX 8021B mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	11/25/2018	ND	2.15	108	2.00	2.25	
Toluene*	<0.050	0.050	11/25/2018	ND	2.07	103	2.00	0.874	
Ethylbenzene*	<0.050	0.050	11/25/2018	ND	2.01	100	2.00	1.42	
Total Xylenes*	**0.190**	0.150	11/25/2018	ND	5.90	98.4	6.00	1.89	
Total BTEX	<0.300	0.300	11/25/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID *101 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**32.0**	16.0	11/25/2018	ND	432	108	400	0.00	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	11/22/2018	ND	191	95.5	200	1.02	
DRO >C10-C28*	<10.0	10.0	11/22/2018	ND	209	105	200	2.15	
EXT DRO >C28-C36	<10.0	10.0	11/22/2018	ND					

Surrogate: 1-Chlorooctane *85.0 %* *41-142*

Surrogate: 1-Chlorooctadecane *86.2 %* *37.6-147*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

ENERGY TRANSFER
JOEL LOWRY
P. O. BOX 1226
JAL NM, 88252
Fax To:

Received:	11/20/2018	Sampling Date:	11/16/2018
Reported:	11/27/2018	Sampling Type:	Soil
Project Name:	COTTON DRAW 10"	Sampling Condition:	Cool & Intact
Project Number:	LEA CO NM	Sample Received By:	Jodi Henson
Project Location:	NONE GIVEN		

Sample ID: V1B @ 5' (H803387-05)

BTEX 8021B mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	11/25/2018	ND	2.15	108	2.00	2.25	
Toluene*	<0.050	0.050	11/25/2018	ND	2.07	103	2.00	0.874	
Ethylbenzene*	<0.050	0.050	11/25/2018	ND	2.01	100	2.00	1.42	
Total Xylenes*	**0.167**	0.150	11/25/2018	ND	5.90	98.4	6.00	1.89	
Total BTEX	<0.300	0.300	11/25/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID *109 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**176**	16.0	11/25/2018	ND	432	108	400	0.00	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	11/22/2018	ND	191	95.5	200	1.02	
DRO >C10-C28*	**13.7**	10.0	11/22/2018	ND	209	105	200	2.15	
EXT DRO >C28-C36	<10.0	10.0	11/22/2018	ND					

Surrogate: 1-Chlorooctane *92.7 %* *41-142*

Surrogate: 1-Chlorooctadecane *98.0 %* *37.6-147*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Notes and Definitions

S-04	The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C
	Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name: ETC Texas Pipeline		**BILL TO**	
Project Manager: Joel Lowry		P.O. #:	
Address:		Company: ETC	
City:	State: NM Zip:	Attn: Dean Enlson	
Phone #:	Fax #:	Address:	
Project #:	Project Owner:	City:	
Project Name: Cotton Draw 10"		State: Zip:	
Project Location: ~~Eddy Co~~ Lea Co, NM		Phone #:	
Sampler Name: Joel Lowry		Fax #:	

FOR LAB USE ONLY				MATRIX						PRESERV.			SAMPLING		ANALYSIS REQUEST		
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL	OTHER:	DATE	TIME	BTEX	TPH 8015	Cl
H803387																	
1	NWHA@5'	G	1			X					X		11/16/18	12:00	X	X	X
2	NEHA@4'													12:05			
3	SWHA@4'													12:10			
4	SEHA@4'													12:15			
5	VIBS@5'													12:20			

Relinquished By: Joel Lowry	Date: 11/20/18	Received By: Jodi Henson	Phone Result: ☐ Yes ☐ No Add'l Phone #:
	Time: 10:25		Fax Result: ☐ Yes ☐ No Add'l Fax #:
Relinquished By:	Date:	Received By:	REMARKS:
	Time:		

Delivered By: (Circle One) Sampler - UPS - Bus - Other: 3.2°C/#97	Sample Condition Cool ☑ Yes ☐ No Intact ☑ Yes ☐ No	CHECKED BY: (Initials)

+ Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326

ATTACHMENT #8

Photographic Log

PHOTOLOG

Photo 1: View of the affected area and immediate response activities ,facing North.

Photo 2: View of the affected area and immediate response activities ,facing Southwest.

PHOTOLOG

Photo 3: View of the affected area after initial response activities, facing South.

Photo 4: View of the affected area after initial response activities, facing North.

ATTACHMENT #9

Release Notification (FORM C-141)

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 Department

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	nCH1828942927
District RP	1RP-5234
Facility ID	fCH1828942393
Application ID	pCH1828943257

Release Notification

Responsible Party

Responsible Party: ETC Texas Pipeline, Ltd.	OGRID: 371183
Contact Name: Carolyn J. Blackaller	Contact Telephone: (817) 302-9766
Contact email: carolyn.blackaller@energytransfer.com	Incident # NCH1828942927 ETC COTTON DRAW PIPELINE @ FCH1828942393
Contact mailing address: 600 N. Marienfeld Street, Suite 700, Midland, TX 79701	

Location of Release Source

Latitude 32.10952 Longitude -103.71871
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Cotton Draw Pipeline	Site Type: Natural Gas Pipeline
Date Release Discovered: 8/24/2018	API# *(if applicable)*: N/A

Unit Letter	Section	Township	Range	County
N	19	T25S	R32E	Lea

Surface Owner: ☐ State ☒ Federal ☐ Tribal ☐ Private (*Name:*)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

☐ Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
☐ Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	☐ Yes ☐ No
☐ Condensate	Volume Released (bbls)	Volume Recovered (bbls)
☒ Natural Gas	Volume Released (Mcf): 113.088	Volume Recovered (Mcf): 0
☐ Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release: On August 24, 2018 at 19:50, a leak was discovered on a segment of the Cotton Draw 10-inch pipeline, which was due to corrosion. A crew was dispatched the following morning, August 25, 2018, at 7:00, to clamp the leaking segment. Once clamped, the leak stopped and field gas no longer affected air or soil.

State of New Mexico
Oil Conservation Division

Incident ID	nCH1828942927
District RP	1RP-5234
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Was this a major release as defined by 19.15.29.7(A) NMAC? ☐ Yes ☒ No	If YES, for what reason(s) does the responsible party consider this a major release? N/A
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? N/A	

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.

☒ The impacted area has been secured to protect human health and the environment.

☒ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. N/A

☒ All free liquids and recoverable materials have been removed and managed appropriately. – N/A

If all the actions described above have not been undertaken, explain why: N/A

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

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

Printed Name: Carolyn J. Blackaller Title: Sr. Environmental Specialist

Signature: Carolyn Blackaller Date: 9/6/2018

email: carolyn.blackaller@energytransfer.com Telephone: (817) 302-9766

OCD Only

Received by: RECEIVED By CHernandez at 11:47 am, Oct 16, 2018

State of New Mexico
Oil Conservation Division

Incident ID	nCH1828942927
District RP	1RP-5234
Facility ID	fCH1828942393
Application ID	pCH1828943257

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discover date.

What is the shallowest depth to groundwater beneath the area affected by the release?		>300 ft.		(ft. bgs)
Did this release impact groundater or surface water?	☐	Yes	☑	No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐	Yes	☑	No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinarly high-water mark)?	☐	Yes	☑	No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐	Yes	☑	No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐	Yes	☑	No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐	Yes	☑	No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐	Yes	☑	No
Are the lateral extents of the release within 300 feet of a wetland?	☐	Yes	☑	No
Are the lateral extents of the release overlying a subsurface mine?	☐	Yes	☑	No
Are the laterial extents of the release overlying an unstable area such as karst geology?	☐	Yes	☑	No
Are the lateral extents of the release within a 100-year floodplain?	☐	Yes	☑	No
Did the release impact areas **not** on an exploration, development, production or storage site?	☑	Yes	☐	No

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

Characterization Report Checklist: ***Each of the following items must be included in the report.***

- ☑ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☑ Field data
- ☑ Data table of soil contaminant concentration data
- ☑ Determination of water sources and significant watercourses within 1/2-mile of the laterial extents of the release
- ☑ Boring or excavation logs
- ☑ Photographs including date and GIS information
- ☑ Topographic/Aerial maps
- ☑ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. Than plan must include the estimated volument of material to be remediated, the proposed remediation technigue, proposed sampling plan and methods, anticipated timelines for beginning and completing th remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modifies by site- and release-specific parameters.

Form C-141
Page 4

State of New Mexico
Oil Conservation Division

Incident ID	nCH1828942927
District RP	1RP-5234
Facility ID	fCH1828942393
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Printed Name: Dean Ericson Title: Sr. Environmental Specialist

Signature: Dean D. Ericson Date: 11/30/2018

email: dean.ericson@energytransfer.com Telephone: 817-302-9758

OCD Only

Received by: Date:

State of New Mexico
Oil Conservation Division

Incident ID	nCH1828942927
District RP	1RP-5234
Facility ID	fCH1828942393
Application ID	pCH1828943257

Remediation Plan

Remediation Plan Checklist: *Each of the following items must be included in the report.*

- ☑ Detailed description of proposed remediation technique
- ☑ Scaled sitemap with GPS coordinates showing delineation points (GPS N/A)
- ☑ Estimated volume of material to be remediated
- ☑ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☑ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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

Printed Name: Dean Ericson Title: Sr. Environmental Specialist

Signature: Date: 11/30/2018

email: dean.ericson@energytransfer.com Telephone: 817-302-9758

OCD Only

Received by: Date:

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

Signature: Date: