



**Jason Michelson**  
Project Manager

**Chevron Environmental  
Management Company**  
1500 Louisiana Street, #38116  
Houston, Texas 77002  
Work: 832-854-5601  
Cell: 281-660-8564  
jmichelson@chevron.com

July 17, 2019

New Mexico Oil Conservation Division, District II  
811 S. First St  
Artesia, NM 88210

**Re: South Culebra Bluff Unit 3  
Closure Letter  
Inspection No. iCLB0601142847  
2RP-3984  
Eddy County, New Mexico**

To whom it concerns,

Please find enclosed for your review a Closure Request for South Culebra Bluff Unit 3. A release was documented for this well in January 2006. Soil remediation and sampling was documented in a series of summary letters prepared by White Buffalo Environmental Services, Inc. (WBESI). In July 2006, documentation of final sampling and a request for closure were submitted to NMOCD. No response to the closure request can be located.

The attached Closure Letter was prepared by Arcadis U.S., Inc. (Arcadis) on behalf of Chevron Environmental Management Company. Copies of the remediation documentation prepared by WBESI are also attached. Chevron acquired the lease for this well in October 2018 and is respectfully requesting written NMOCD approval for closure of the open Order (2RP-3984) associated with this release.

Please do not hesitate to call Rebecca Andresen with Arcadis at 206-726-4717 or myself at 832-854-5601, should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Michelson".

Jason Michelson

Encl. South Culebra Bluff Unit 3- Closure Request  
South Culebra Bluff Unit 3 Correspondences

C.C. Brett Krehbiel, Arcadis

Mr. Rob Hamlet  
New Mexico Oil Conservation Division - District II  
Environmental Specialist  
811 S. First St.  
Artesia, NM 88210

Arcadis U.S., Inc.  
630 Plaza Drive  
Suite 100  
Highlands Ranch  
Colorado 80129  
Tel 720 344 3500  
Fax 720 344 3535  
www.arcadis.com

Subject:

**Closure Request**

South Culebra Bluff Unit 3  
Inspection No. iCLB0601142847  
2RP-3984  
Eddy County, New Mexico

ENVIRONMENTAL

Date:

July 17, 2019

Contact:

Rebecca Andresen

Phone:

206-726-4717

Email:

Rebecca.Andresen@arcadis  
.com

Our ref:

B0049810.0000

Dear Mr. Hamlet:

On behalf of Chevron Environmental Management Company (CEMC), Arcadis U.S., Inc. (Arcadis) prepared this Closure Request for the South Culebra Bluff Unit 3 (Site), API # 30-015-22700, located in Eddy County, New Mexico. On January 11, 2006, NMOCD completed an inspection on the site, operated by Range Operating New Mexico Inc. (Range) at the time, who was issued a Letter of Violation(iCLB0601142847) January 11, 2006. It is assumed that this violation is associated with open Order Number 2RP-3984; documentation of the violation and remediation (summarized below) were located on the NMOCD online imaging site for this Order Number.

The purpose of the Report is to summarize the cleanup activities for the violation dated January 11, 2006, and to respectfully request written NMOCD approval for closure.

## **SITE DESCRIPTION AND BACKGROUND**

The Site is located approximately 1.5 miles from Loving in Unit G, Section 23, Township 23S, Range 28E, Eddy County, New Mexico.

On January 11, 2006, during a routine inspection (iCLB0601142847) conducted by NMOCD, the inspector observed staining around the wellhead and standing fluids.

On January 27, 2006, White Buffalo Environmental Services (WBESI) submitted a Remediation Work Plan to NMOCD to address the staining violation. WBESI proposed to complete the site remediation according to NMOCD's standards. On January 30, 2006, NMOCD approved the Remediation Work Plan with limitations.

Between March and May 2006, multiple rounds of excavation were completed. Interim reports were submitted to NMOCD. Final samples were collected in May 2006, and submitted for laboratory analyses for benzene, toluene ethylbenzene, total xylenes, total petroleum, hydrocarbons, and chlorides. The summary report submitted to NMOCD (WBESI July 2006) reported that laboratory analytical results did not detect exceedances above the remediation limit.

WBESI submitted a report dated July 10, 2006 to conclude the remedial actions and request closure from NMOCD; no response to the closure request can be located. Copies of the Summary Reports are included as Attachment 1.

Chevron acquired the lease for this well in October 2018. Arcadis on behalf of CEMC, is respectfully requesting written NMOCD for closure of the violation from NMOCD on January 11, 2006, and associated Order Number 2RP-3984. If you have any questions or comments, please contact Rebecca Andresen at 206.726.4717 or by email at [rebecca.andresen@arcadis.com](mailto:rebecca.andresen@arcadis.com).

Sincerely,

Arcadis U.S., Inc.



Rebecca Andresen  
Vice President

Copies:

Jason Michelson, Chevron/CEMC

Enclosures:

#### **Attachments**

- 1 South Culebra Bluff Unit 3 Reports and Correspondences



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

*Field Inspection Program*

*"Preserving the Integrity of Our Environment"*

17-Jan-06

**RANGE OPERATING NEW MEXICO INC**

777 MAIN STREET SUITE 800

FT WORTH TX 76102

**LETTER OF VIOLATION - Inspection**

Dear Operator:

The following inspection(s) indicate that the well, equipment, location or operational status of the well(s) failed to meet standards of the New Mexico Oil Conservation Division as described in the detail section below. To comply with standards imposed by Rules and Regulations of the Division, corrective action must be taken immediately and the situation brought into compliance. The detail section indicates preliminary findings and/or probable nature of the violation. This determination is based on an inspection of your well or facility by an inspector employed by the Oil Conservation Division on the date(s) indicated.

Please notify the proper district office of the Division, in writing, of the date corrective actions are scheduled to be made so that arrangements can be made to reinspect the well and/or facility.

**INSPECTION DETAIL SECTION**

**SOUTH CULEBRA BLUFF UNIT No.003**

**G-23-23S-28E**

**30-015-22700-00-00**

Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
01/11/2006	Routine/Periodic	Chris Beadle	Yes	No	2/10/2006	iCLB0601142847

**Violations**

Surface Leaks/Spills

**Comments on Inspection:**

Met with Greg Swindle, White Buffalo Environmental Services, Inc, representing the operator, to examine various wells in this area for remediation projects status. Driving by this well, observed that the well had standing fluids and fresh soil contamination on location. Cellar has standing fluids and saturated soils.

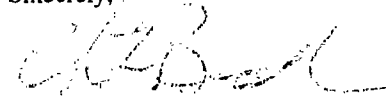
Remediation is required. Submit a remediation work plan to OCD District 2 Office prior to February 10, 2006.

OCD approved remediation must begin on this release no later than February 17, 2006. Until a remediation work plan is received, the NMOCD District 2 Office must be notified 48 hours prior to any remediation work or prior to taking samples where results of the samples may be submitted to the OCD.

2RP-3984

In the event that a satisfactory response is not received to this letter of direction by the "Corrective Action Due By:" date shown above, further enforcement will occur. Such enforcement may include this office applying to the Division for an order summoning you to a hearing before a Division Examiner in Santa Fe to show cause why you should not be ordered to permanently plug and abandon this well. Such a hearing may result in imposition of CIVIL PENALTIES for your violation of OCD rules.

Sincerely,



Artesia OCD District Office

**Note:** Information in Detail Section comes directly from field inspector data entries - not all blanks will contain data.

\*Significant Non-Compliance events are reported directly to the EPA, Region VI, Dallas, Texas.

April 10, 2006

NMOCD District 2 Office  
Oil Conservation Division  
Chris Beadle  
1301 West Grand  
Artesia, New Mexico 88210

RE: Letter of Violation for Range Operating New Mexico, Inc. Inspection, South  
Culebra Bluff (SCB) Unit No. 003

**Chronology**

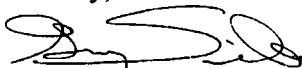
On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range -Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained. The site was assessed for a formal work plan and specific site information obtained.

On March 29, 2006 after receiving notice from Tony Tucker, Range Resources Production Foreman Loving New Mexico Area., of completion of excavation and remediation; Ronnie Taylor of White Buffalo Environmental Services Inc arrived on site to perform final sampling. A sample was collected from the floor area of the spill site. The sample was immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The sample was analyzed for BTEX, TPH (NM 8015N), and Chloride content.

On April 10, 2006 the sample results were received from the laboratory. The results revealed that the BTEX, and TPH concentrations were above remediation limits. Further excavation will be performed and a future sampling date will be coordinated with you.

Please review the attached results and notify me via letter or email if you have any questions.

Sincerely,



Greg Swindle,  
President  
WBESI

Enclosures:

Laboratory results

# ASK Laboratories, Inc.

Analytical Services Kwik!

ASK LABORATORIES, INC.  
5935 GLENOAK LANE  
AMARILLO, TEXAS 79109

Attn: CUSTOMER SERVICES  
Phone: (806) 353-4425

WHITE BUFFALO ENVIRO. SERVICE  
5425 BEN FICKLIN ROAD  
SAN ANGELO, TX 76904

Attn: GREG SWINDLE

Order #: 06-03-131  
Date: 04/06/06 09:46  
Work ID: FLOOR COMPOSITE  
Date Received: 03/31/06  
Date Completed: 04/06/06

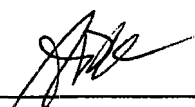
Purchase Order: RANGE SCB23 #3-B/  
Invoice Number:

Client Code: WHITE\_BUFF

## SAMPLE IDENTIFICATION

<u>Sample Number</u>	<u>Sample Description</u>
01	FLOOR COMPOSITE

<u>Sample Number</u>	<u>Sample Description</u>
--------------------------	-------------------------------

  
\_\_\_\_\_  
Certified By  
ALAN D. KING

5935 Glenoak Lane  
Amarillo, Texas 79109  
Telephone (806) 353-4425  
Toll Free 1-800-423-9443  
Facsimile (806) 352-6454

**ASK Laboratories, Inc.**

Analytical Services Kwik!

Order # 06-03-131  
04/06/06 09:46

ASK LABORATORIES, INC.

Page 2

TEST RESULTS BY SAMPLE

Sample: 01A FLOOR COMPOSITE

Collected: 03/29/06 09:20

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	94.45		wt % solids	03/31/06	BJP
CHLORIDE ON SOLIDS	6260	100	mg/kg	03/31/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<78.7	78.7	mg/kg	04/05/06	BNH
TPH C12-C28 - DRO	5100	78.7	mg/kg	04/05/06	BNH
TPH C28-C35	982	78.7	mg/kg	04/05/06	BNH
BTEX					
BENZENE	<0.017	0.017	mg/kg	04/03/06	KDJ
TOLUENE	<0.017	0.017	mg/kg	04/03/06	KDJ
ETHYLBENZENE	<0.017	0.017	mg/kg	04/03/06	KDJ
XYLENE	<0.017	0.017	mg/kg	04/03/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	109	Min: 80		Max: 120	

5935 Glenoak Lane  
Amarillo, Texas 79109  
Telephone (806) 353-4425  
Toll Free 1-800-423-9443  
Facsimile (806) 352-6454



# ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-03-131  
04/06/06 09:46

ASK LABORATORIES, INC.

Page 3

## QA/QC INFORMATION

	LCS	MS	MSD	RPD	BLANK
MTBE	100%	107%	106%	0.4%	bd1
BENZENE	99%	95%	93%	1.6%	bd1
TOLUENE	96%	90%	91%	1.1%	bd1
ETHYLBENZENE	99%	95%	96%	1.0%	bd1
o-XYLENE	100%	93%	94%	0.8%	bd1
m,p-XYLENES	100%	97%	97%	0.0%	bd1
METHOD 8015	LCS	MS	MSD	RPD	BLANK
TPH	95%	94%	92%	2.3%	bd1
COMPOUND	RPD	SPIKE RECOVERY	QC RECOVERY	BLANK	
CHLORIDE	0.9%	91%	94%	bd1	

bd1 = below detectable levels

## TEST METHODOLOGIES

TEST CODE : SOLIDS TEST NAME : PERCENT SOLIDS FOR DRY WT CORRECTIONS

REFERENCE CLP PROTOCOL/ SECTION IV/ PART F

TEST CODE : 8015N TEST NAME : TRPH-8015M (GRO, DRO, C28-35)

METHOD 8015M GCFID GAS CHROMATOGRAPHY WITH FLAME-  
IONIZATION DETECTOR. SW-846 TEST METHODS FOR  
EVALUATING SOLID WASTES.

TEST CODE : BTEX TEST NAME : BTEX

METHOD 8260 GC/MS GAS CHROMATOGRAPHY WITH MASS-  
SELECTIVE DETECTOR. SW-846 TEST METHODS FOR  
EVALUATING SOLID WASTES.

TEST CODE : CL\_SOL TEST NAME : CHLORIDE ON SOLID

METHOD 300.0 : ION CHROMATOGRAPHY  
METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES,

METHOD 9056 ION CHROMATOGRAPHY  
SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.

5935 Glenoak Lane  
Amarillo, Texas 79109  
Telephone (806) 353-4425  
Toll Free 1-800-423-9443  
Facsimile (806) 352-6454

# ASK Laboratories

Analytical Services Kwik!

5935 Glenoak Lane  
Amarillo, Texas 79109  
Telephone: (806) 353-4425  
Facsimile: (806) 352-6454

# Chain of Custody Record

Work Order No. \_\_\_\_\_  
Client Name White Buffalo Environmental  
Project I.D./Location Range Operating SCB 23 #3-B  
Address 5425 Ben Ficklin Rd. San Angelo, TX 76904  
Telephone (325) 651-9054  
Sampled By Ronnie Taylor

Please note: Liability and Damages. ASK Laboratories liability and clients exclusive remedy for any claim arising whether based in contract or tort shall be limited to the amount paid by the client for the analyses. All claims, including those for negligence and other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories within thirty days of the applicable service. In no event shall ASK Laboratories be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by the client, its subsidiaries, affiliates, or successors arising out of or related to the performance of services rendered by ASK Laboratories, regardless of whether such claims is based upon any of the preceding stated reasons or otherwise.

Sample #	Date	Time	Matrix	Composite	Grab	Sample Description	No. of Containers	Analysis Required	Remarks
01	3/29/06	9:20	soil	X		Floor composite	1	XXX	glass
02									
03									
04									
05									
06									
07									
08									
09									
10									

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
<u>Ronnie Taylor</u>	3/30/06	8:00A	<u>Ronnie Taylor</u>	3/30/06	8:00A
<u>Ronnie Taylor</u>	3/30/06	16:30P	<u>BUS</u>	3/30/06	16:30P
<u>BUS</u>	3/30/06	0700	<u>AAK</u>	3/30/06	0700

Remarks:	Yes	No	If Yes, Amt.	If No, Explain	Comments
Headspace	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
Properly Sealed	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
Chilled to 40° F	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
Tamper Seal	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
Type of Container					
Additional Comments:					

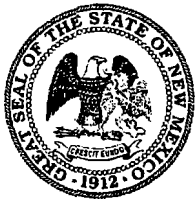
Client Agrees to:	
Accept Returned Sample	
Pay for sample Disposal (\$30 per 100 grams)	
Client's Signature	

**White Buffalo Environmental Services, Inc.**

**5425 Ben Ficklin Road San Angelo, Texas 76904**

**Phone: 325-651-9054 Fax: 325-651-2125**

Client (Name):		Range											
Address:													
City, State, Zip:													
Telephone:													
Fax:													
W.B.E.S. Lab No.	Date	Time	Comp. Grab.	Sample Description	No. of Samples	Type of Container	BTEX	TRPH NM	TCCLP	RCRA Metals	TDS	PAH	CHLORIDES
06-	3/29	9:20	X	Floor composite	1	glass	X	X					X
06-													
06-													
06-													
06-													
06-													
06-													
06-													
06-													
06-													
06-													
Sampled By:		Date:		Time:		Temp.		Witnessed By:		Date:		Time:	
Signature: <i>[Signature]</i>		3/29/06		9:20 A				Signature: <i>[Signature]</i>					
Relinquished By:		Date:		Time:		Temp.		Received By:		Date:		Time:	
Signature: <i>[Signature]</i>		3/30/06		9:00 A				Signature: <i>[Signature]</i>		3/30/06		8:00 A	
Relinquished By:		Date:		Time:		Temp.		Received for Laboratory By:		Date:		Time:	
Signature: <i>[Signature]</i>		3/30/06		3:30/06				Signature: <i>[Signature]</i>		ASK Labs			



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

**Range Operating New Mexico, Inc.**

777 Main Street, Suite 800

Fort Worth, TX 76102

*January 30, 2006*

## **REMEDIATION WORK PLAN CONDITIONS OF APPROVAL - SOUTH CULEBRA BLUFF UNIT NO. 3**

Dear Operator:

A review of the remediation work plan submitted on January 27, 2006, by White Buffalo Environmental Services, Inc., for the South Culebra Bluff Unit #3 (30-015-22700) has been completed by this office. Conditions for approval are as follows:

- Highly Contaminated/Saturated Soils must be remediated by excavating to the maximum depth and horizontal extent practicable until a representative sample from the walls and bottom of the excavation is below the contaminant specific remediation level. Upon reaching this limit samples should be taken from the walls and bottom of the excavation to determine the remaining levels of soil contaminants. All soils removed from the location must be documented as to contaminants in the soils, contaminant levels, method of determining contaminant levels and disposition of the soils (OCD approved landfarm, centralized site, etc.).
  - Highly contaminated/saturated soils are defined as those soils which contain a free liquid phase or exhibit gross staining.
- Unsaturated Contaminated Soils may be excavated or may be remediated by treatment of soil in place, until a representative sample is below the contaminant specific remediation level. One time applications of contaminated soils may be landfarmed on location by spreading the soil in an approximately six inch lifts within a bermed area. Only soils which do not contain free liquids can be landfarmed. The soils should be disced regularly to enhance biodegradation of the contaminants. If necessary and upon approval by OCD, moisture and nutrients may be added to the soil to enhance aerobic biodegradation. Due to the site ranking score for this location, this is considered to be a high risk area and an impermeable liner is required to prevent leaching of contaminants into the underlying soil. Landfarming sites that will receive soils from more than one location are considered centralized sites and must be approved separately by the OCD prior to operation. All soils removed from the location must be documented as to contaminants in the soils, contaminant levels, method of determining contaminant levels and disposition of the soils (OCD approved landfarm, centralized site, etc.).
  - Unsaturated contaminated soils are defined as soils which are not highly contaminated/saturated but contain benzene, toluene, ethylbenzene and xylenes (BTEX) and total petroleum hydrocarbons (TPH) or other potential fresh water contaminants unique to the leak, spill or release (e.g. chlorides).
- Contaminated soils requiring remediation should be remediated so that residual contaminant concentrations are below the recommended soil remediation action level. Chloride levels should be remediated to naturally occurring background levels. If soil action levels cannot practicably be attained, a detailed evaluation of risk may be performed and provided in writing to OCD for approval showing that the remaining contaminants will not pose a threat to present or foreseeable beneficial use of fresh water, public health and the environment.

- Once the "most cost effective means of disposal or onsite bioremediation" has been determined, as outlined in the remediation work plan, a supplement to the remediation work plan describing the method of disposal or bioremediation must be submitted to the OCD District 2 Office for approval.
- If ground water is encountered during the soil/waste characterization, excavation or remediation of the impacted soils, a sample should be obtained to assess the potential impact on ground water quality and the OCD District 2 Office should be notified immediately.
- Notify OCD District 2 Office 24 hours prior to conducting work by Range Operating New Mexico, Inc., contractors or sub-contractors that is intended to excavate, wash, move or disturb (such as in tilling, blading, etc.) soils or contaminated materials for the purpose of remediation, or hauling any soils or contaminated materials into or out of the location covered under this remediation work plan. This notification is to ensure NMOCD personnel are able to monitor compliance with approved remediation work plans as required by the New Mexico Administrative Code. Therefore, if a reasonable schedule of work cannot be provided then a separate notification that work is to resume is required if work ceases at the location for more than 5 days.
- Notify OCD District 2 Office 24 hours prior to obtaining samples where analysis of samples will be submitted to OCD. ALL final delineation sample results must be submitted to the OCD whether or not the OCD actually witnesses those samples being taken.
- Upon termination of any required remedial actions, the area of a leak, spill or release may be closed, **after obtaining approval for the closure from the OCD District 2 office**, by backfilling any excavated areas, contouring to provide drainage, revegetating the area or other OCD approved methods. Upon completion of remedial activities a final report summarizing all actions taken to mitigate environmental damage related to the leak, spill or release will be provided to OCD for approval.

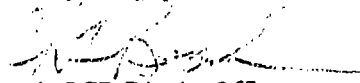
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Acceptance of the remediation work plan does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of reports and work plans does not relieve the operator of responsibility for compliance with any other federal, state or local laws and/or regulations.

NMOCD District 2 Contact Person: Chris Beadle, Office: (505) 748-1283 x107 / Cell: (505) 626-0831 / Fax: (505) 748-9720 / E-mail: [Chris.Beadle@state.nm.us](mailto:Chris.Beadle@state.nm.us)

Thank you for your prompt attention to this matter and your efforts in helping to protect our environment and the infrastructure of the oil and gas industry.

Sincerely,

  
Artesia OCD District Office

cc: Greg Swindle, WBSEI (unsigned copy via e-mail)

January 27, 2006

NMOCD District 2 Office  
Oil Conservation Division  
Chris Beadle  
1301 West Grand  
Artesia, New Mexico 88210

RE: Range Operating New Mexico, Inc. Inspection, South Culebra Bluff (SCB) Unit No. 003

**Chronology**

On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range –Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained. WBESI uses the attached information and metrics sheet for summarizing the remediation requirements for this site.

The following is an initial "Remediation Work Plan" for this site:

**South Culebra Bluff (SCB) Unit No.003**

**General site characteristics**

**Depth to Ground Water: 52'**

**Wellhead Protection Area: 1000 yards to closest well**

**Distance to Nearest Surface Water Body: 5,250'**

**Site ranking score 10**

**Soil remediation action levels**

Highly Contaminated / Saturated Soils

Benzene 10 ppm, BTEX 50 ppm, TPH 1000 ppm

**Soil remediation methods**

Excavation and disposal (or alternative approved onsite remediation)

**Planned analytical testing**

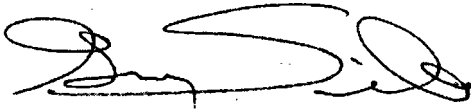
BTEX, TPH, Chlorides on soil

**Work Plan**

- Excavate until limits are obtained in a vertical and horizontal direction.
- Sample site for above parameters.

- Determine quantity of spoils removed from the excavated area.
- Determine most cost effective means of disposal or onsite bioremediation in accordance with NMOCD "Guidelines for Remediation of Leaks, Spills, and Releases".
- Contact NMOCD to set up sampling and post remediation inspection for February 9, 2006.
- Review analytical results.
- Backfill excavation if limits have been achieved or continue excavation.
- Sampling will be per NMOCD guidance including all walls and floor of the excavation.
- A final report will be issued on behalf of Range to the NMOCD documenting all final activities.
- A final letter of concurrence and closure will be issued by NMOCD if all guidelines have been achieved.

For further questions or comments please contact White Buffalo Environmental Services, Inc. at (325) 651-9054.



Greg Swindle,  
President  
WBESI

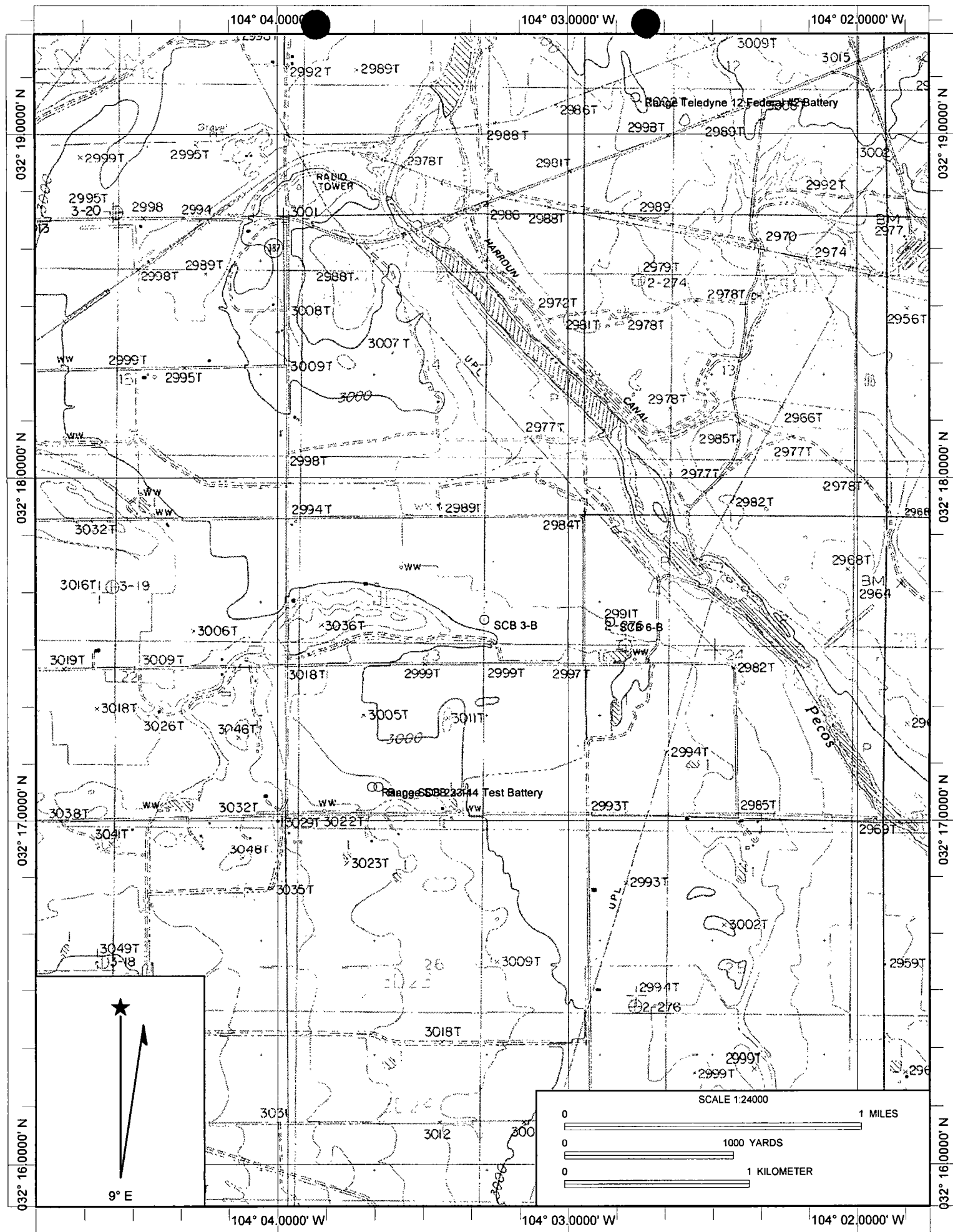
Enclosures:

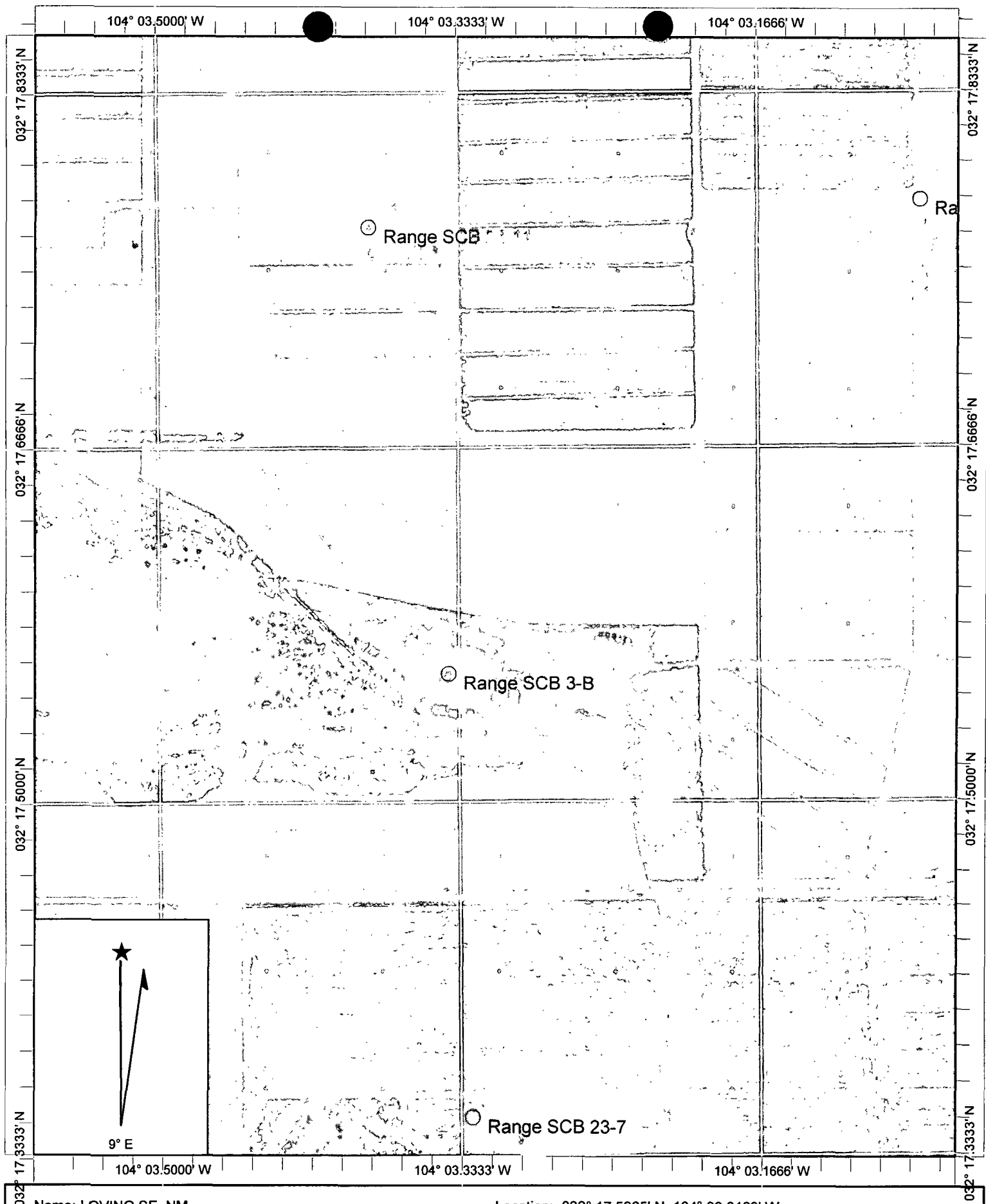
Information and Metrics sheet  
USGS Map  
Aerial Photo  
Site Photographs

**RANGE OPERATING NEW MEXICO, INC**  
**Information and Metrics**

<b>Incident Date:</b> January 11, 2006		<b>NMOCD Notified:</b> January 11, 2006	
<b>Site:</b> South Culebra Bluff Unit No.003		<b>Assigned Site Reference #:</b> iCLB0601142847	
<b>Company:</b> Range Operating New Mexico, Inc.			
<b>Street Address:</b> 777 Main Street Suite 800			
<b>Mailing Address:</b> 777 Main Street Suite 800			
<b>City, State, Zip:</b> Ft. Worth, TX 76102			
<b>Representative:</b> George Teer			
<b>Representative Telephone:</b> (817) 870-2601			
<b>Fluid volume released (bbls):</b> 3		<b>Recovered (bbls):</b> 0	
<i>25 bbls: Notify NMOCD verbally within 24 hrs and submit form C-141 within 15 days. (Also applies to unauthorized releases &gt;500 mcf Natural Gas) 5 – 25 bbls: Submit form C-141 within 15 days</i>			
<b>Leak, Spill, or Pit (LSP) Name:</b> SCB Unit No.3			
<b>Source of contamination:</b> Cleaning out cellar area and dumping waste on ground			
<b>Land Owner, i.e., BLM, ST, Fee, Other:</b> Johnny L. Reid			
<b>LSP Dimensions:</b> 60' X 50'			
<b>LSP Area:</b> All around wellhead			
<b>Location of Reference Point (RP):</b> NA			
<b>Location distance and direction from RP:</b> NA			
<b>Latitude:</b> N 32° 17.588'			
<b>Longitude:</b> W 104° 3.282'			
<b>Elevation above mean sea level:</b> 2999' per USGS Map			
<b>Location- Unit or ¼ ¼:</b> SE/4 NW/4 of Sec. 23		<b>Unit Letter:</b> M	
<b>Location Section:</b> 23			
<b>Location- Township:</b> 23S			
<b>Location Range:</b> 28E			
<b>Surface water body within 1000' radius of site:</b> No 3394' per USGS Map			
<b>Domestic water wells within 1000' radius of site:</b> No 1734' per map			
<b>Agricultural water wells within 1000' radius of site:</b> No 1734' per map			
<b>Depth from land surface to ground water (DG):</b> 60' estimated based upon relationship to Pecos River			
<b>Depth of contamination (DC):</b> 8'			
<b>Depth to ground water (DG – DC = DtGW):</b> 52'			
<b>1. Ground water</b>	<b>2. Wellhead Protection Area</b>	<b>3. Distance to Surface Water Body</b>	
If Depth to GW <50 feet: 20 points	If <1000' from water source, or <200' from private domestic water source: 20 points	<200 horizontal feet: 20 points	
If Depth to GW 50 to 99 feet: 10 points		200-100 horizontal feet: 10 points	
If Depth to GW >100 feet: 0 points	If >1000' from water source, or >200' from private domestic water source: 0 points	>1000 horizontal feet: 0 points	
Ground Water Score = 10	Wellhead Protection Area Score = 0	Surface Water Score = 0	
Site Rank (1+2+3) = 10			
<b>Total Site Ranking Score and Acceptable Concentrations</b>			
Parameter	>19	10-19	0-9
Benzene	10 ppm	10 ppm	10 ppm
BTEX	50 ppm	50 ppm	50 ppm
TPH	100 ppm	1,000 ppm	5,000 ppm



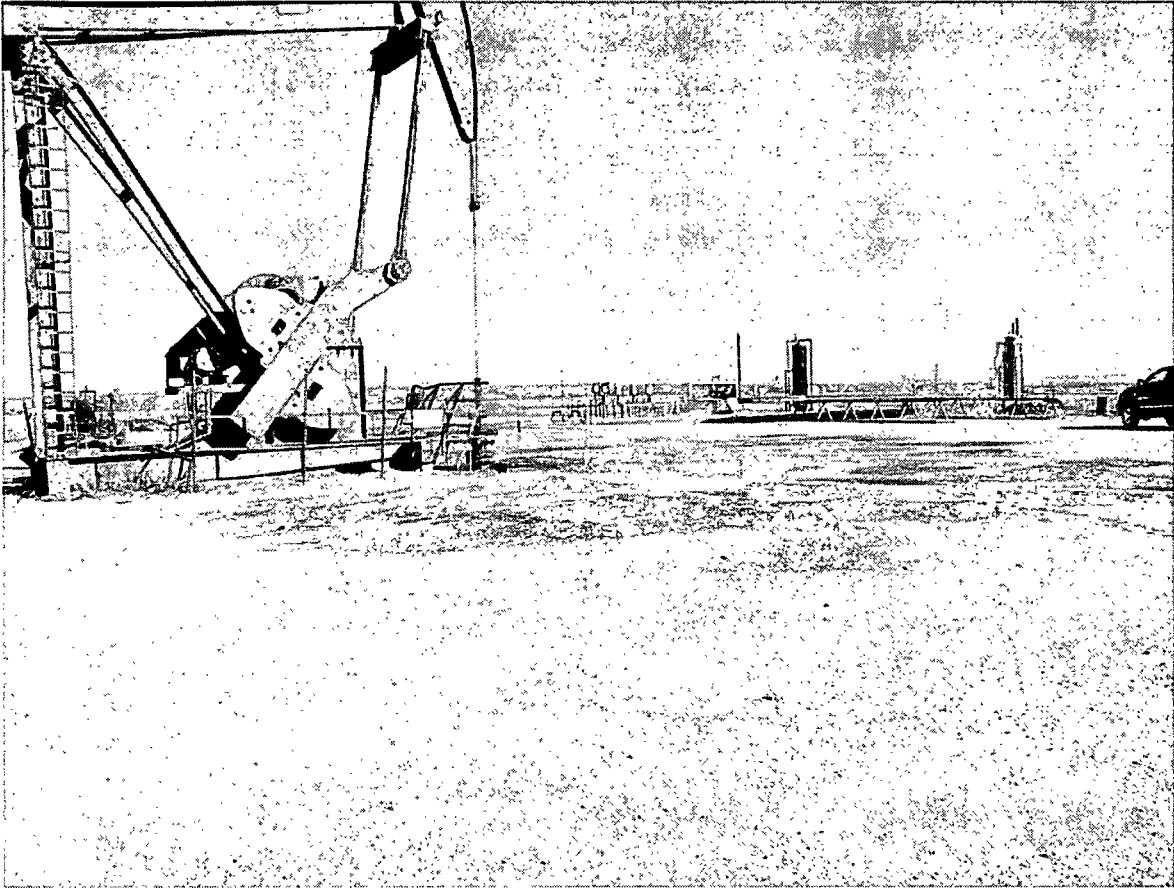




Name: LOVING SE, NM  
Date: 1/27/2006  
Scale: 1 inch equals 333 feet

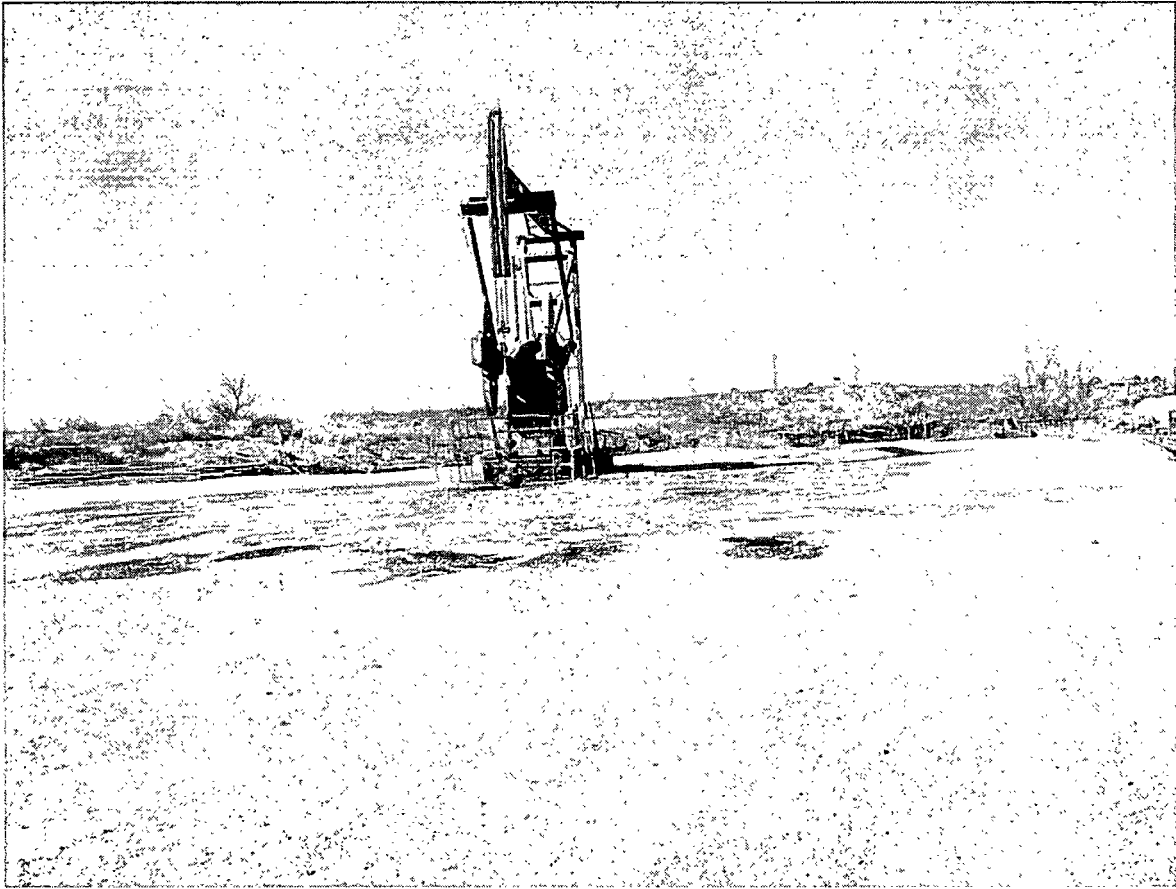
Location: 032° 17.5965' N 104° 03.3123' W

Photographs 1/11/06  
SCB 23-3



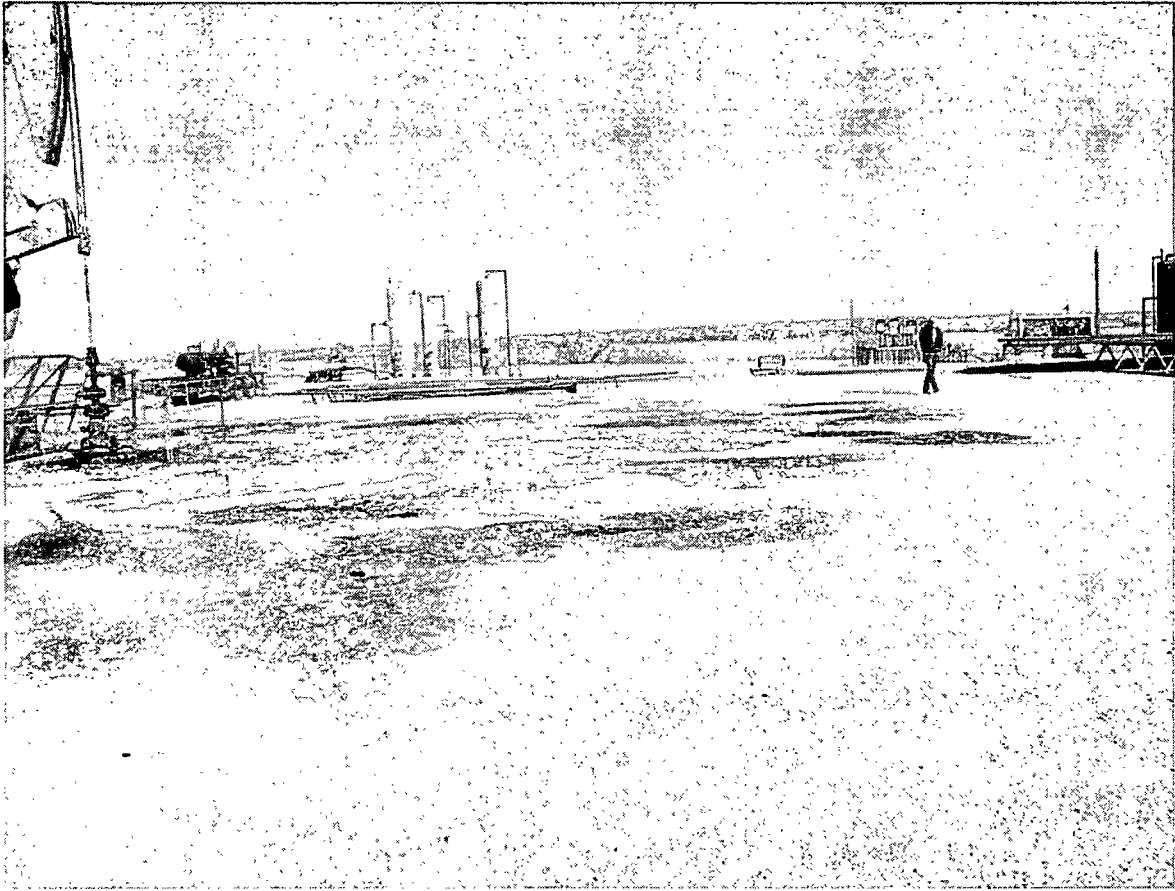
NW to SE view

Photographs 1/11/06  
SCB 23-3



East to West view

Photographs 1/11/06  
SCB 23-3



South to North view.

May 5, 2006

NMOCD District 2 Office  
Oil Conservation Division  
Mike Bratcher  
1301 West Grand  
Artesia, New Mexico 88210

RE: Letter of Violation for Range Operating New Mexico, Inc. Inspection, South Culebra Bluff (SCB) Unit No. 003

**Chronology**

On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range –Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained. The site was assessed for a formal work plan and specific site information obtained.

On March 29, 2006 after receiving notice from Tony Tucker, Range Resources Production Foreman Loving New Mexico Area., of completion of excavation and remediation; Ronnie Taylor of White Buffalo Environmental Services Inc arrived on site to perform final sampling. A sample was collected from the floor area of the spill site. The sample was immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The sample was analyzed for BTEX, TPH (NM 8015N), and Chloride content.

On April 10, 2006 the sample results were received from the laboratory. The results revealed that the BTEX, and TPH concentrations were above remediation limits. Further excavation will be performed and a future sampling date will be coordinated with you.

On April 13, 2006, Ronnie Taylor with WBESI performed additional sampling. The samples were immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The samples were analyzed for BTEX, TPH (NM 8015N), and Chloride content.

One April 19, 2006 the sample results were received from the laboratory. The results again revealed that the BTEX, and TPH concentrations were above remediation limits. Further excavation will be performed and a future sampling date will be coordinated with you.

Please review the attached results and notify me via letter or email if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Swindle', with a stylized flourish at the end.

Greg Swindle,  
President  
WBESI

Enclosures:

Laboratory results  
Photographs

# ASK Laboratories, Inc.

Analytical Services Kwik!

ASK LABORATORIES, INC.  
5935 GLENOAK LANE  
AMARILLO, TEXAS 79109

Attn: CUSTOMER SERVICES  
Phone: (806) 353-4425

WHITE BUFFALO ENVIRO. SERVICE  
5425 BEN FICKLIN ROAD  
SAN ANGELO, TX 76904

Attn: GREG SWINDLE

Order #: 06-04-037  
Date: 04/19/06 14:30  
Work ID: SCB 23 #3B S1-S3  
Date Received: 04/14/06  
Date Completed: 04/19/06

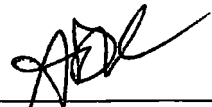
Purchase Order: RANGE OPERATING, LOVING NM  
Invoice Number:

Client Code: WHITE\_BUFF

## SAMPLE IDENTIFICATION

<u>Sample Number</u>	<u>Sample Description</u>
01	SCB 23 #3B S1
02	SCB 23 #3B S2

<u>Sample Number</u>	<u>Sample Description</u>
03	SCB 23 #3B S3

  
\_\_\_\_\_  
Certified By  
ALAN D. KING

5935 Glenoak Lane  
Amarillo, Texas 79109  
Telephone (806) 353-4425  
Toll Free 1-800-423-9443  
Facsimile (806) 352-6454



# ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-04-037  
04/19/06 14:30

ASK LABORATORIES, INC.

Page 2

## TEST RESULTS BY SAMPLE

Sample: 01A SCB 23 #3B S1

Collected: 04/13/06 09:15

Test Description	Result	SQL	Units	Analyzed	By
PERCENT SOLIDS - DRY WT.	94.84		wt % solids	04/17/06	BJP
CHLORIDE ON SOLIDS	4390	100	mg/kg	04/18/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<33.5	33.5	mg/kg	04/18/06	BNH
TPH C12-C28 - DRO	2580	33.5	mg/kg	04/18/06	BNH
TPH C28-C35	629	33.5	mg/kg	04/18/06	BNH
BTEX					
BENZENE	<0.021	0.021	mg/kg	04/17/06	KDJ
TOLUENE	<0.021	0.021	mg/kg	04/17/06	KDJ
ETHYLBENZENE	<0.021	0.021	mg/kg	04/17/06	KDJ
XYLENE	0.046	0.021	mg/kg	04/17/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	99	Min: 80	Max: 120		

Sample: 02A SCB 23 #3B S2

Collected: 04/13/06 09:15

Test Description	Result	SQL	Units	Analyzed	By
PERCENT SOLIDS - DRY WT.	97.99		wt % solids	04/17/06	BJP
CHLORIDE ON SOLIDS	7360	100	mg/kg	04/18/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<32.7	32.7	mg/kg	04/18/06	BNH
TPH C12-C28 - DRO	999	32.7	mg/kg	04/18/06	BNH
TPH C28-C35	240	32.7	mg/kg	04/18/06	BNH
BTEX					
BENZENE	<0.018	0.018	mg/kg	04/17/06	KDJ
TOLUENE	<0.018	0.018	mg/kg	04/17/06	KDJ
ETHYLBENZENE	<0.018	0.018	mg/kg	04/17/06	KDJ
XYLENE	<0.018	0.018	mg/kg	04/17/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	102	Min: 80	Max: 120		

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Amarillo, Texas 79109  
Telephone (806) 353-4425  
Toll Free 1-800-423-9443  
Facsimile (806) 352-6454

# ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-04-037  
04/19/06 14:30

ASK LABORATORIES, INC.

Page 3

## TEST RESULTS BY SAMPLE

Sample: 03A SCB 23 #3B S3

Collected: 04/13/06 09:15

Test Description	Result	SQL	Units	Analyzed	By
PERCENT SOLIDS - DRY WT.	97.84		wt % solids	04/17/06	BJP
CHLORIDE ON SOLIDS	10800	100	mg/kg	04/18/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<32.4	32.4	mg/kg	04/18/06	BNH
TPH C12-C28 - DRO	667	32.4	mg/kg	04/18/06	BNH
TPH C28-C35	146	32.4	mg/kg	04/18/06	BNH
BTEX					
BENZENE	<0.020	0.020	mg/kg	04/17/06	KDJ
TOLUENE	<0.020	0.020	mg/kg	04/17/06	KDJ
ETHYLBENZENE	<0.020	0.020	mg/kg	04/17/06	KDJ
XYLENE	<0.020	0.020	mg/kg	04/17/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	101	Min: 80	Max: 120		

## QA/QC INFORMATION

	LCS	MS	MSD	RPD	BLANK
MTBE	91%	93%	103%	10.7%	bdl
BENZENE	97%	93%	93%	0.3%	bdl
TOLUENE	89%	86%	85%	1.5%	bdl
ETHYLBENZENE	92%	89%	89%	0.9%	bdl
o-XYLENE	93%	88%	88%	0.8%	bdl
m,p-XYLENES	89%	91%	90%	1.2%	bdl
METHOD 8015	LCS	MS	MSD	RPD	BLANK
TPH	98%	79%	76%	1.8%	bdl
COMPOUND	RPD	SPIKE RECOVERY	QC RECOVERY	BLANK	
CHLORIDE	0.3%	91%	95%	bdl	

bdl = below detectable levels

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# ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-04-037  
04/19/06 14:30

ASK LABORATORIES, INC.

Page 4

## TEST METHODOLOGIES

TEST CODE : SOLIDS      TEST NAME : PERCENT SOLIDS FOR DRY WT CORRECTIONS  
  
REFERENCE CLP PROTOCOL/ SECTION IV/ PART F

TEST CODE : 8015N      TEST NAME : TRPH-8015M (GRO, DRO, C28-35)  
  
METHOD 8015M GCFID GAS CHROMATOGRAPHY WITH FLAME-  
IONIZATION DETECTOR. SW-846 TEST METHODS FOR  
EVALUATING SOLID WASTES.

TEST CODE : BTEX      TEST NAME : BTEX  
  
METHOD 8260 GC/MS GAS CHROMATOGRAPHY WITH MASS-  
SELECTIVE DETECTOR. SW-846 TEST METHODS FOR  
EVALUATING SOLID WASTES.

TEST CODE : CL\_SOL      TEST NAME : CHLORIDE ON SOLID  
  
METHOD 300.0 : ION CHROMATOGRAPHY  
METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES,  
  
METHOD 9056 ION CHROMATOGRAPHY  
SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.

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# ASK Laboratories

Analytical Services Kwik!

5935 Glenoak Lane  
Amarillo, Texas 79109  
Telephone: (806) 353-4425  
Facsimile: (806) 352-6454

## Chain of Custody Record

Work Order No. \_\_\_\_\_  
Client Name White Buffalo Environmental  
Project I.D./Location Range Overlook Lovings NM  
Address 5425 Ben Ficklin Rd San Angelo, TX 76901  
Telephone 325-651-9054  
Sampled By Ronnie Taylor

Please note: Liability and Damages. ASK Laboratories liability and clients exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims, including those for negligence and other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories within thirty days of the applicable service. In no event shall ASK Laboratories be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by the client, its subsidiaries, affiliates, or successors arising out of or related to the performance of services rendered by ASK Laboratories, regardless of whether such claims is based upon any of the preceding stated reasons or otherwise.

Sample #	Date	Time	Matrix	Composite	Grab	Sample Description	No. of Containers	Analysis Required	Remarks
01	4-13-06	9:15a	Soil		X	SCB 23 #3B S1	1	X	glass
02			↓		X	SCB 23 #3B S2	1	X	↓
03			↓		X	SCB 23 #3B S3	1	X	↓
04									
05									
06									
07									
08									
09									
10									

Relinquished by: (Signature) <u>Ronnie Taylor</u>	Date 4-13-06	Time 10:30p	Received by: (Signature) <u>BUS</u>
Relinquished by: (Signature) <u>BUS</u>	Date 4-14-06	Time 0705	Received by: (Signature) <u>ADN</u>
Relinquished by: (Signature)	Date	Time	Received by: (Signature)

Client Agrees to:	Remarks:
Accept Returned Sample	Headspace
Pay for sample Disposal (\$30 per 100 grams)	Property Sealed
Client's Signature	Chilled to 40° F
	Tamper Seal
	Type of Container
	Additional Comments:

Yes	No	If Yes, Amt.	If No, Explain
<input checked="" type="checkbox"/>	<input type="checkbox"/>	1/2"	
<input checked="" type="checkbox"/>	<input type="checkbox"/>		
<input checked="" type="checkbox"/>	<input type="checkbox"/>		
<input type="checkbox"/>	<input checked="" type="checkbox"/>		

# Login Checklist

Order # 0604037

Shipping Method: BUS

Date/Time of Receipt: 4-14 0705

## Cooler Check

Shipping Container	Ice in Cooler			Custody Seal				Tracking Number
			If No,	Present?		Intact?		
	Yes	No	Temperature	Yes	No	Yes	No	
Cover	X				X			

Note: If the temperature of a cooler/sample is above 6°C fill out NCR.

## Custody Seals on Bottles Present:

Yes \_\_\_\_\_ No X

If Yes, is it intact?

Yes \_\_\_\_\_ No \_\_\_\_\_

If Not intact, fill out NCR

## Condition of Containers:

Loose Caps:

Yes \_\_\_\_\_ No X

If Yes, fill out NCR

Broken Containers:

Yes \_\_\_\_\_ No X

If Yes, fill out NCR

## Chain of Custody Included:

Yes X No \_\_\_\_\_

If Yes, verify receipt of all containers listed and all required fields are complete. Sign and Date COC and fill out laboratory boxes. Document any discrepancies on NCR.

## Acid Preserved Samples: pH<=2

Yes \_\_\_\_\_ No N/A

If No, fill out NCR

## Base Preserved Samples: pH>=12

Yes \_\_\_\_\_ No \_\_\_\_\_

If No, fill out NCR

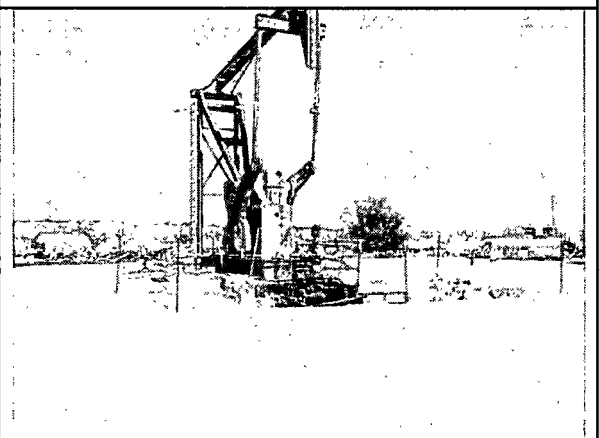
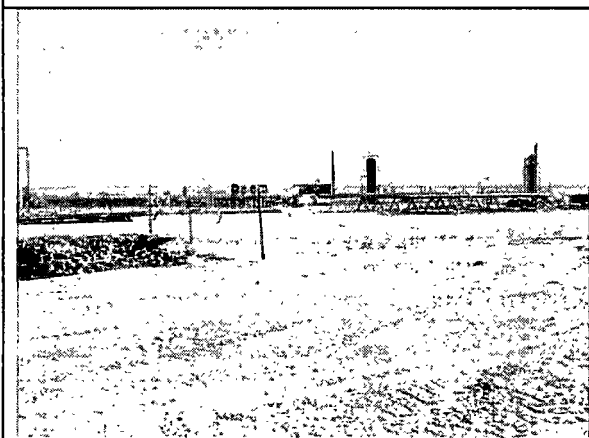
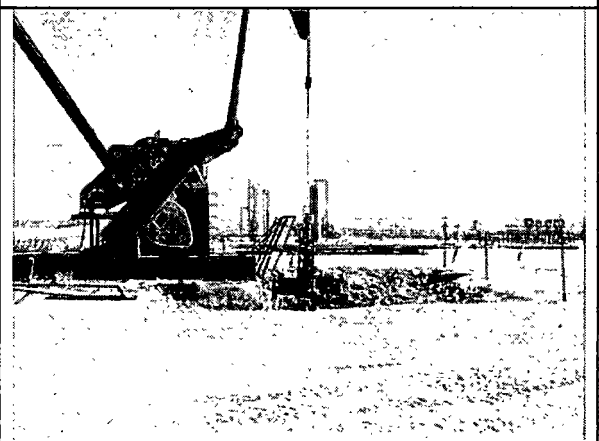
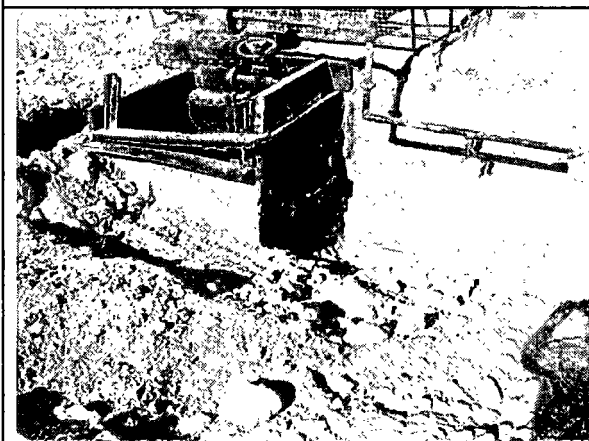
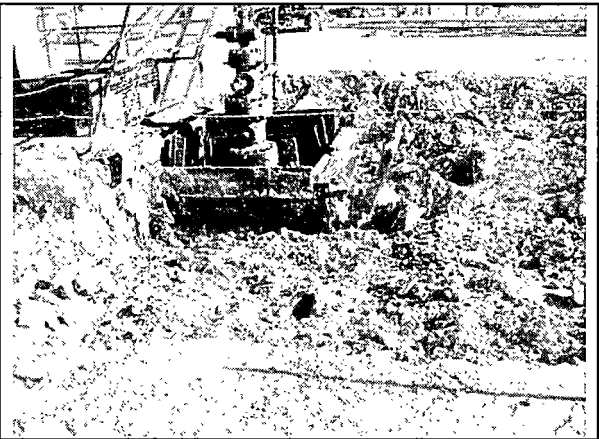
Coolers Unpacked/Checked by: MDK

Date: 4-14

NCRs (y/n): ✓

Faxed Confirmation (y/n): \_\_\_\_\_

Site Photographs  
SCB 23-3  
4-13-2006



**Bratcher, Mike, EMNRD**

**From:** Greg Swindle [greg@wbesi.com]  
**Sent:** Friday, May 05, 2006 1:09 PM  
**To:** 'Tony Tucker'; Bratcher, Mike, EMNRD  
**Cc:** 'Linda Stiles'  
**Subject:** SCB 23-3 or SCB 3B  
**Attachments:** SCB 23-3 5-5-06.pdf

Tony and Mike,

Attached is a letter and sample analysis showing that the referenced site is still above remediation limits.

Tony, please continue excavation for one more time. Another 12-18 inches maybe will clear this site. If we do not achieve limits at that time way may need to research another form of closure.

Mike, please review that attached results. We will be contacting you at least 48 hours prior to the next sampling event. If you have any questions please don't hesitate to call.

If any of you need a hard copy of this let me know. A hard copy of all results, photographs, and complete documentation will be furnished to all in a bound final report upon obtaining closure limits.

**Greg Swindle**

President  
White Buffalo Environmental Services, Inc.  
5425 Ben Ficklin Road  
San Angelo, Texas 76904  
Phone (325) 651-9054  
Fax (325) 651-2125  
Cell (325) 895-0410

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**From:** Deepa Floyd [mailto:deepa@wbesi.com]  
**Sent:** Friday, May 05, 2006 1:52 PM  
**To:** Greg Swindle  
**Subject:** SCB 23-3

***Deepa Floyd***

White Buffalo Environmental Services, Inc.  
5425 Ben Ficklin Road  
San Angelo, TX 76904  
Phone: (325) 651-9054  
Fax: (325) 651-2125  
[deepa@wbesi.com](mailto:deepa@wbesi.com)

5/5/2006

## WHITE BUFFALO ENVIRONMENTAL SERVICES

July 10, 2006

NMOCD District 2 Office  
Oil Conservation Division  
Mike Bratcher  
1301 West Grand  
Artesia, New Mexico 88210

RECEIVED  
JUL 12 2006  
OCD-ARTESIA

RE: Letter of Violation for Range Operating New Mexico, Inc. Inspection, South  
Culebra Bluff (SCB) Unit No. 003

### Chronology

\* On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range -Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained. The site was assessed for a formal work plan and specific site information obtained. See attachment #1

On March 29, 2006 after receiving notice from Tony Tucker, Range Resources Production Foreman Loving New Mexico Area., of completion of excavation and remediation; Ronnie Taylor of White Buffalo Environmental Services Inc arrived on site to perform final sampling. A sample was collected from the floor area of the spill site. The sample was immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The sample was analyzed for BTEX, TPH (NM 8015N), and Chloride content.

On April 10, 2006 the sample results were received from the laboratory. The results revealed that the BTEX, and TPH concentrations were above remediation limits. See attachment #2 for the results of this sampling.

On April 13, 2006 the site was again visited after further excavation. The results of this sampling was obtained and revealed again that limits were exceeded and further sampling would be required. See attachment #3 for the results of this sampling.

On May 17, 2006 the site was again visited after further sampling. The analytical results revealed that the limits were obtained and no further excavation was required. See attachment # 4 for these results.

Tony Tucker of Range was notified that the limits had been obtained and that site closure was now warranted. Tony utilized the services of several trucking firms in the Loving area to transport the spoils of the excavation to Controlled Recovery, Inc.; PO Box 388;



Hobbs, New Mexico, 88241-0388 (CRI). CRI was the final disposal place of all of the contaminated soils numbering approximately 212 cubic yards based upon the Manifest enclosed in Attachment #5 of this letter.

Please consider this NOV action item complete and send Range Operating Company your concurrence of final closure on this NOV action item.

Please review the attached results and notify me via letter or email if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Swindle', with a stylized, cursive script.

Greg Swindle,  
President  
WBESI

Enclosures:

- Attachment #1 Filed Remediation Work plan
- Attachment #2 03/29/06 Sampling Results and Documentation
- Attachment #3 04/13/06 Sampling Results and Documentation
- Attachment #4 05/17/06 Sampling Results and Documentation
- Attachment #5 Disposal Manifest.

January 27, 2006

NMOCD District 2 Office  
Oil Conservation Division  
Chris Beadle  
1301 West Grand  
Artesia, New Mexico 88210

RE: Range Operating New Mexico, Inc. Inspection, South Culebra Bluff (SCB) Unit No. 003

**Chronology**

On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range -Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained. WBESI uses the attached information and metrics sheet for summarizing the remediation requirements for this site.

The following is an initial "Remediation Work Plan" for this site:

**South Culebra Bluff (SCB) Unit No.003**

**General site characteristics**

**Depth to Ground Water: 52'**

**Wellhead Protection Area: 1000 yards to closest well**

**Distance to Nearest Surface Water Body: 5,250'**

**Site ranking score 10**

**Soil remediation action levels**

**Highly Contaminated / Saturated Soils**

**Benzene 10 ppm, BTEX 50 ppm, TPH 1000 ppm**

**Soil remediation methods**

**Excavation and disposal (or alternative approved onsite remediation)**

**Planned analytical testing**

**BTEX, TPH, Chlorides on soil**

**Work Plan**

- Excavate until limits are obtained in a vertical and horizontal direction.
- Sample site for above parameters.

- Determine quantity of spoils removed from the excavated area.
- Determine most cost effective means of disposal or onsite bioremediation in accordance with NMOCD "Guidelines for Remediation of Leaks, Spills, and Releases".
- Contact NMOCD to set up sampling and post remediation inspection for February 9, 2006.
- Review analytical results.
- Backfill excavation if limits have been achieved or continue excavation.
- Sampling will be per NMOCD guidance including all walls and floor of the excavation.
- A final report will be issued on behalf of Range to the NMOCD documenting all final activities.
- A final letter of concurrence and closure will be issued by NMOCD if all guidelines have been achieved.

For further questions or comments please contact White Buffalo Environmental Services, Inc. at (325) 651-9054.



Greg Swindle,  
President  
WBESI

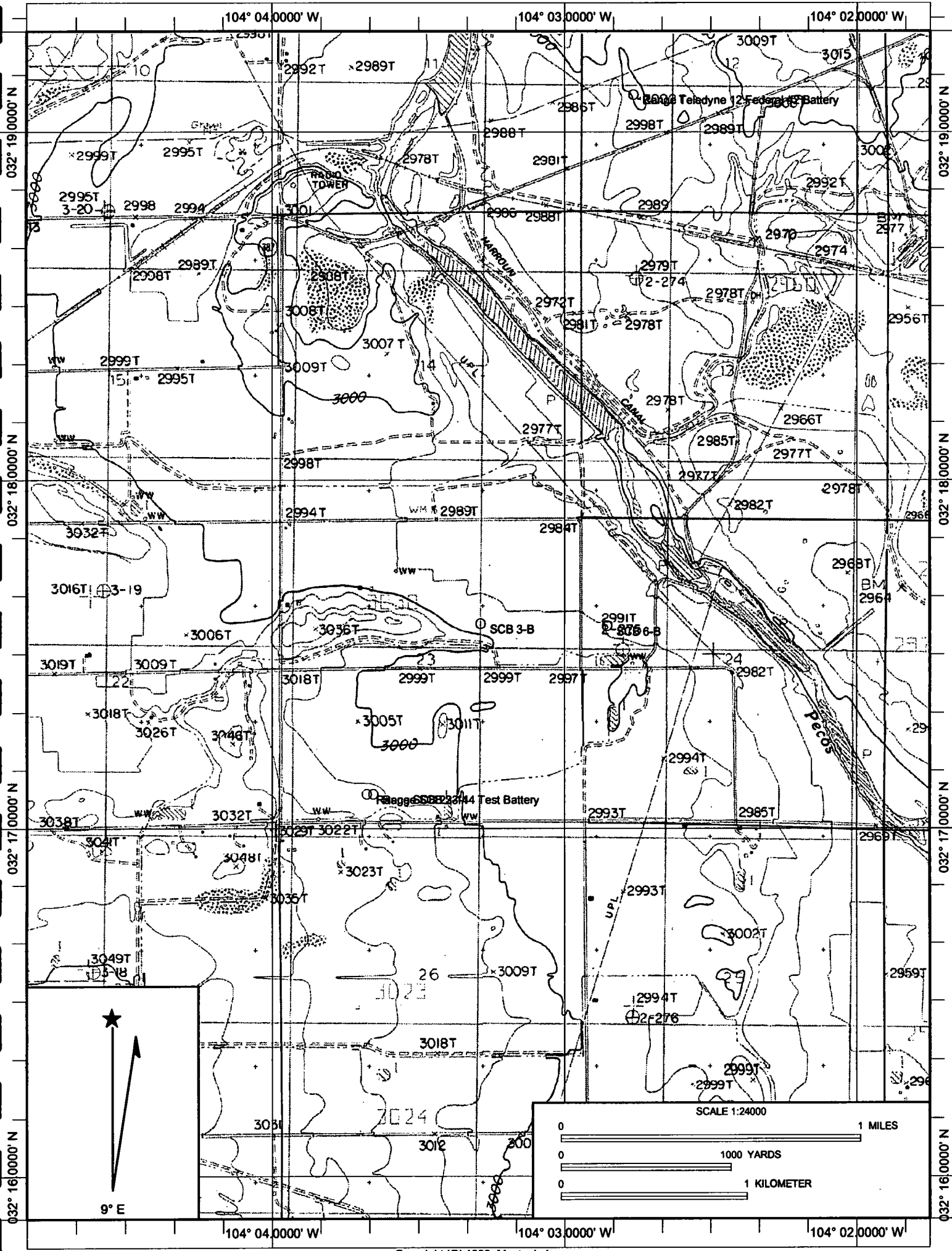
Enclosures:

Information and Metrics sheet  
USGS Map  
Aerial Photo  
Site Photographs

# RANGE OPERATING NEW MEXICO, INC

## Information and Metrics

<b>Incident Date:</b> January 11, 2006		<b>NMOCD Notified:</b> January 11, 2006	
<b>Site:</b> South Culebra Bluff Unit No.003		<b>Assigned Site Reference #:</b> iCLB0601142847	
<b>Company:</b> Range Operating New Mexico, Inc.			
<b>Street Address:</b> 777 Main Street Suite 800			
<b>Mailing Address:</b> 777 Main Street Suite 800			
<b>City, State, Zip:</b> Ft. Worth, TX 76102			
<b>Representative:</b> George Teer			
<b>Representative Telephone:</b> (817) 870-2601			
<b>Fluid volume released (bbls):</b> 3		<b>Recovered (bbls):</b> 0	
<i>25 bbls: Notify NMOCD verbally within 24 hrs and submit form C-141 within 15 days.          (Also applies to unauthorized releases &gt;500 mcf Natural Gas)          5 – 25 bbls: Submit form C-141 within 15 days</i>			
<b>Leak, Spill, or Pit (LSP) Name:</b> SCB Unit No.3			
<b>Source of contamination:</b> <i>Cleaning out cellar area and dumping waste on ground</i>			
<b>Land Owner, i.e., BLM, ST, Fee, Other:</b> Johnny L. Reid			
<b>LSP Dimensions:</b> 60' X 50'			
<b>LSP Area:</b> All around wellhead			
<b>Location of Reference Point (RP):</b> NA			
<b>Location distance and direction from RP:</b> NA			
<b>Latitude:</b> N 32° 17.588'			
<b>Longitude:</b> W 104° 3.282'			
<b>Elevation above mean sea level:</b> 2999' per USGS Map			
<b>Location- Unit or ¼ ¼:</b> SE/4 NW/4 of Sec. 23		<b>Unit Letter:</b> M	
<b>Location Section:</b> 23			
<b>Location- Township:</b> 23S			
<b>Location Range:</b> 28E			
<b>Surface water body within 1000' radius of site:</b> No 3394' per USGS Map			
<b>Domestic water wells within 1000' radius of site:</b> No 1734' per map			
<b>Agricultural water wells within 1000' radius of site:</b> No 1734' per map			
<b>Depth from land surface to ground water (DG):</b> 60' estimated based upon relationship to Pecos River			
<b>Depth of contamination (DC):</b> 8'			
<b>Depth to ground water (DG – DC = DtGW):</b> 52'			
<b>1. Ground water</b>		<b>2. Wellhead Protection Area</b>	
If Depth to GW <50 feet: 20 points		If <1000' from water source, or <200' from private domestic water source: 20 points	
If Depth to GW 50 to 99 feet: 10 points		If >1000' from water source, or >200' from private domestic water source: 0 points	
If Depth to GW >100 feet: 0 points			
Ground Water Score = 10		Wellhead Protection Area Score = 0	
Site Rank (1+2+3) = 10			
<b>Total Site Ranking Score and Acceptable Concentrations</b>			
Parameter	>19	10-19	0-9
Benzene	10 ppm	10 ppm	10 ppm
BTEX	50 ppm	50 ppm	50 ppm
TPH	100 ppm	1,000 ppm	5,000 ppm



104° 03.5000' W

104° 03.3333' W

104° 03.1666' W

032° 17.8333' N

032° 17.6666' N

032° 17.5000' N

032° 17.3333' N

032° 17.8333' N

032° 17.6666' N

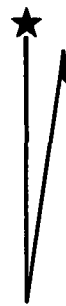
032° 17.5000' N

032° 17.3333' N

Range SCB 23-11

Range SCB 3-B

Range SCB 23-7



9° E

104° 03.5000' W

104° 03.3333' W

104° 03.1666' W

Name: LOVING SE, NM

Date: 1/27/2006

Scale: 1 inch equals 333 feet

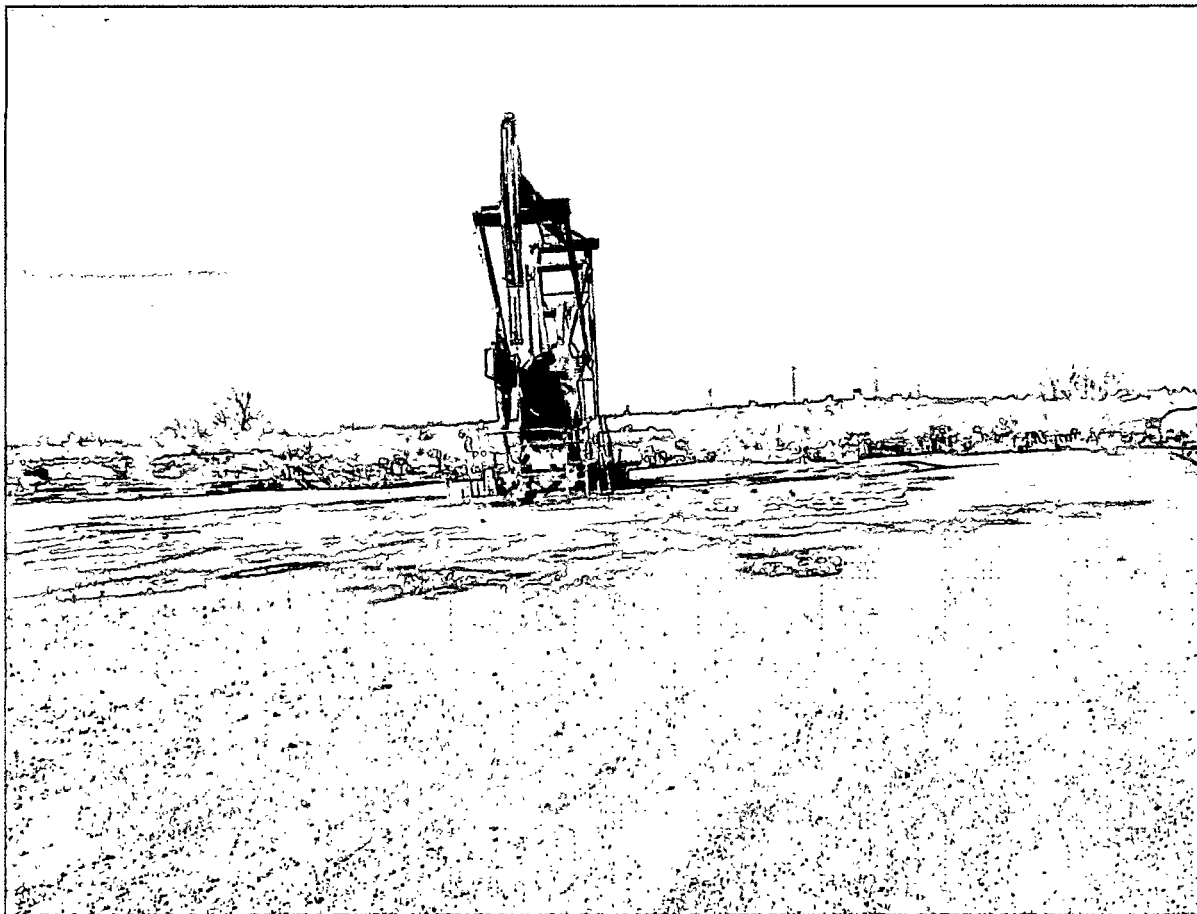
Location: 032° 17.5965' N 104° 03.3123' W

Photographs 1/11/06  
SCB 23-3



NW to SE view

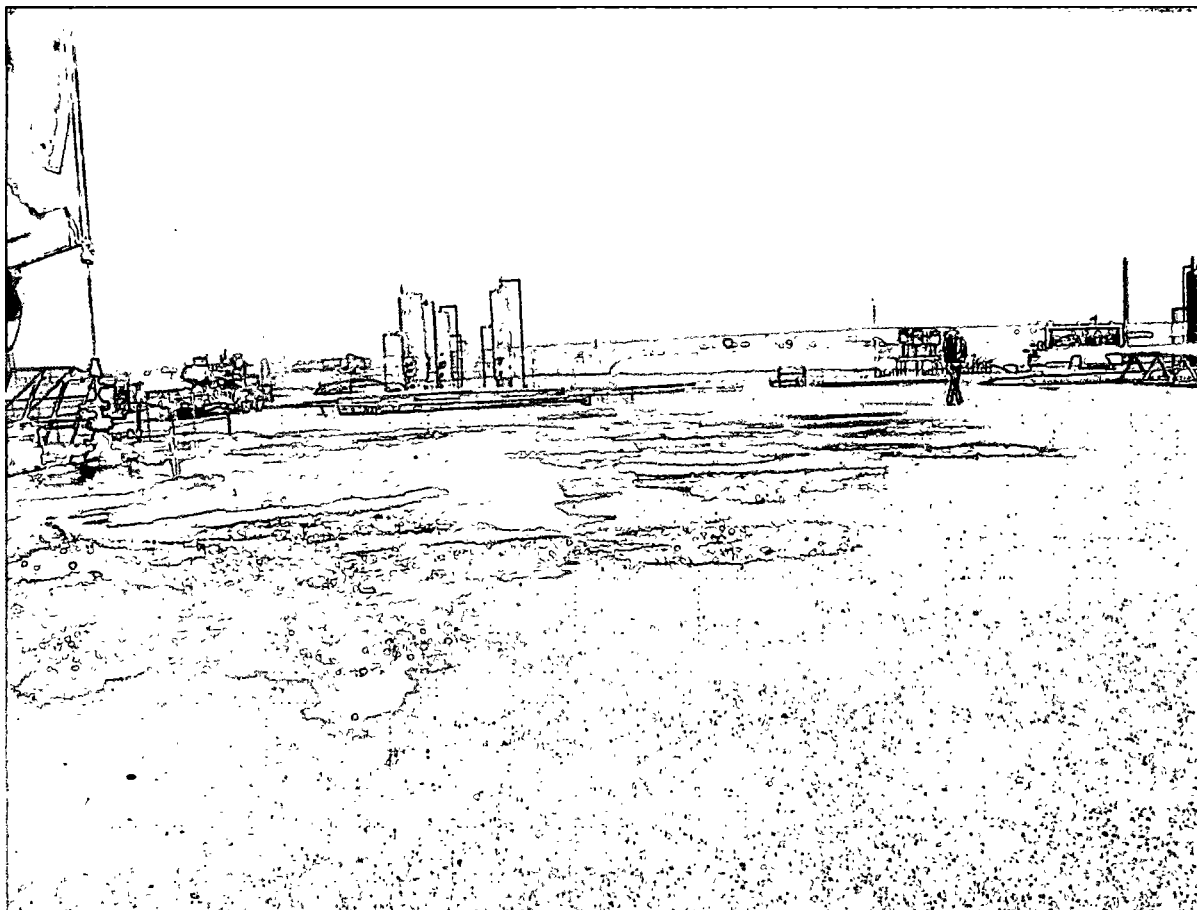
Photographs 1/11/06  
SCB 23-3



East to West view



Photographs 1/11/06  
SCB 23-3



South to North view.

April 10, 2006

NMOCD District 2 Office  
Oil Conservation Division  
Chris Beadle  
1301 West Grand  
Artesia, New Mexico 88210

RE: Letter of Violation for Range Operating New Mexico, Inc. Inspection, South  
Culebra Bluff (SCB) Unit No. 003

**Chronology**

On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range -Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained. The site was assessed for a formal work plan and specific site information obtained.

On March 29, 2006 after receiving notice from Tony Tucker, Range Resources Production Foreman Loving New Mexico Area., of completion of excavation and remediation; Ronnie Taylor of White Buffalo Environmental Services Inc arrived on site to perform final sampling. A sample was collected from the floor area of the spill site. The sample was immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The sample was analyzed for BTEX, TPH (NM 8015N), and Chloride content.

On April 10, 2006 the sample results were received from the laboratory. The results revealed that the BTEX, and TPH concentrations were above remediation limits. Further excavation will be performed and a future sampling date will be coordinated with you.

Please review the attached results and notify me via letter or email if you have any questions.

Sincerely,



Greg Swindle,  
President  
WBESI

Enclosures:

Laboratory results

# ASK Laboratories, Inc.

Analytical Services Kwik!

ASK LABORATORIES, INC.  
5935 GLENOAK LANE  
AMARILLO, TEXAS 79109

Attn: CUSTOMER SERVICES  
Phone: (806) 353-4425

WHITE BUFFALO ENVIRO. SERVICE  
5425 BEN FICKLIN ROAD  
SAN ANGELO, TX 76904

Attn: GREG SWINDLE

Order #: 06-03-131  
Date: 04/06/06 09:46  
Work ID: FLOOR COMPOSITE  
Date Received: 03/31/06  
Date Completed: 04/06/06


Purchase Order: RANGE SCB23 #3-B/  
Invoice Number:

Client Code: WHITE\_BUFF

## SAMPLE IDENTIFICATION

<u>Sample Number</u>	<u>Sample Description</u>
01	FLOOR COMPOSITE

<u>Sample Number</u>	<u>Sample Description</u>
--------------------------	-------------------------------

  
\_\_\_\_\_  
Certified By  
ALAN D. KING

5935 Glenoak Lane  
Amarillo, Texas 79109  
Telephone (806) 353-4425  
Toll Free 1-800-423-9443  
Facsimile (806) 352-6454

**ASK Laboratories, Inc.**

Analytical Services Kwik!

Order # 06-03-131  
04/06/06 09:46

ASK LABORATORIES, INC.

Page 2

TEST RESULTS BY SAMPLE

Sample: 01A FLOOR COMPOSITE

Collected: 03/29/06 09:20

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	94.45		wt % solids	03/31/06	BJP
CHLORIDE ON SOLIDS	6260	100	mg/kg	03/31/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<78.7	78.7	mg/kg	04/05/06	BNH
TPH C12-C28 - DRO	5100	78.7	mg/kg	04/05/06	BNH
TPH C28-C35	982	78.7	mg/kg	04/05/06	BNH
BTEX					
BENZENE	<0.017	0.017	mg/kg	04/03/06	KDJ
TOLUENE	<0.017	0.017	mg/kg	04/03/06	KDJ
ETHYLBENZENE	<0.017	0.017	mg/kg	04/03/06	KDJ
XYLENE	<0.017	0.017	mg/kg	04/03/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	109	Min: 80		Max: 120	

5935 Glenoak Lane  
Amarillo, Texas 79109  
Telephone (806) 353-4425  
Toll Free 1-800-423-9443  
Facsimile (806) 352-6454

# ASK Laboratories, Inc.

## Analytical Services Kwik!

Order # 06-03-131  
04/06/06 09:46

ASK LABORATORIES, INC.

Page 3

### QA/QC INFORMATION

	LCS	MS	MSD	RPD	BLANK
MTBE	100%	107%	106%	0.4%	bd1
BENZENE	99%	95%	93%	1.6%	bd1
TOLUENE	96%	90%	91%	1.1%	bd1
ETHYLBENZENE	99%	95%	96%	1.0%	bd1
o-XYLENE	100%	93%	94%	0.8%	bd1
m,p-XYLENES	100%	97%	97%	0.0%	bd1
METHOD 8015	LCS	MS	MSD	RPD	BLANK
TPH	95%	94%	92%	2.3%	bd1
COMPOUND	RPD	SPIKE RECOVERY	QC RECOVERY	BLANK	
CHLORIDE	0.9%	91%	94%	bd1	

bd1 = below detectable levels

### TEST METHODOLOGIES

TEST CODE : SOLIDS      TEST NAME : PERCENT SOLIDS FOR DRY WT CORRECTIONS

REFERENCE CLP PROTOCOL/ SECTION IV/ PART F

TEST CODE : 8015N      TEST NAME : TRPH-8015M (GRO, DRO, C28-35)

METHOD 8015M GCFID GAS CHROMATOGRAPHY WITH FLAME-  
IONIZATION DETECTOR. SW-846 TEST METHODS FOR  
EVALUATING SOLID WASTES.

TEST CODE : BTEX      TEST NAME : BTEX

METHOD 8260 GC/MS GAS CHROMATOGRAPHY WITH MASS-  
SELECTIVE DETECTOR. SW-846 TEST METHODS FOR  
EVALUATING SOLID WASTES.

TEST CODE : CL\_SOL      TEST NAME : CHLORIDE ON SOLID

METHOD 300.0 : ION CHROMATOGRAPHY  
METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES,

METHOD 9056 ION CHROMATOGRAPHY  
SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.

5935 Glenoak Lane  
Amarillo, Texas 79109  
Telephone (806) 353-4425  
Toll Free 1-800-423-9443  
Facsimile (806) 352-6454

# ASK Laboratories

Analytical Services Kwiki!

5935 Glenoak Lane  
Amarillo, Texas 79109  
Telephone: (806) 353-4425  
Facsimile: (806) 352-6454

# Chain of Custody Record

Work Order No. \_\_\_\_\_  
Client Name White Buffalo Environmental  
Project I.D./Location Range Operating SOB 23 #3-B  
Address 5425 Ben Ficklin Rd. San Angelo, TX 76904  
Telephone (325) 651-9054  
Sampled By Konnie Taylor

Please note: Liability and Damages. ASK Laboratories liability and clients exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims, including those for negligence and other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories within thirty days of the applicable service. In no event shall ASK Laboratories be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by the client, its subsidiaries, affiliates, or successors arising out of or related to the performance of services rendered by ASK Laboratories, regardless of whether such claims is based upon any of the preceding stated reasons or otherwise.

Sample #	Date	Time	Matrix	Composite	Grab	Sample Description	No. of Containers	Analysis Required	Remarks
01	3/29/06	9:20	soil	X		Floor composite	1	XXX	glass
02									
03									
04									
05									
06									
07									
08									
09									
10									

Relinquished by: (Signature) <u>Konnie Taylor</u>	Date <u>3/30/06</u>	Time <u>8:00A</u>	Received by: (Signature) <u>OT Floyd</u>
Relinquished by: (Signature) <u>OT Floyd</u>	Date <u>3/30/06</u>	Time <u>16:30P</u>	Received by: (Signature) <u>BUS</u>
Relinquished by: (Signature) <u>BUS</u>	Date <u>3/30</u>	Time <u>0100</u>	Received by: (Signature) <u>AMK</u>

Client Agrees to:	
Accept Returned Sample	
Pay for sample Disposal (\$30 per 100 grams)	
Client's Signature _____	

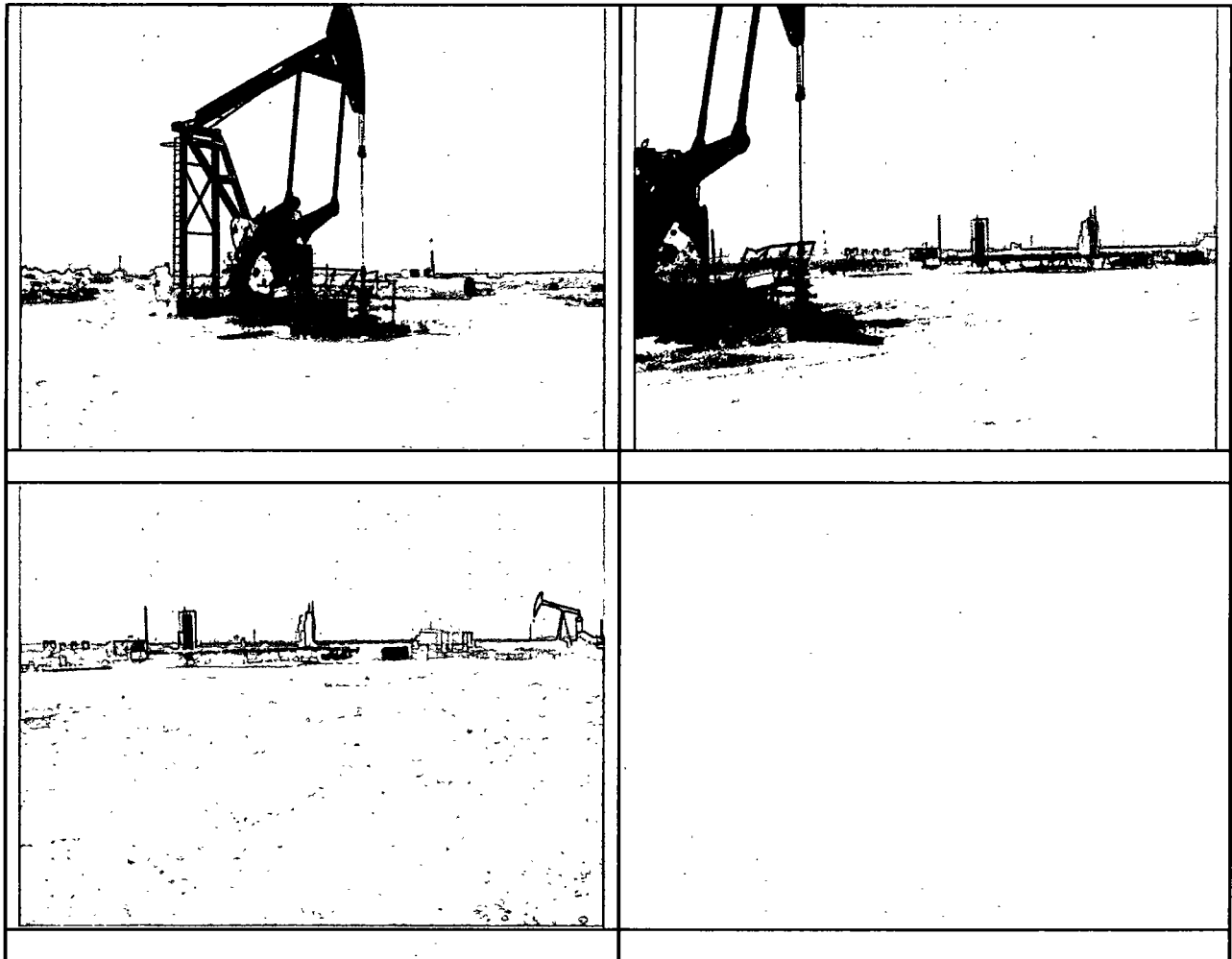
Remarks:	Yes	No	If Yes, Amt.	If No, Explain	If No, Temp.	Comments
Headspace		<input checked="" type="checkbox"/>				
Properly Sealed	<input checked="" type="checkbox"/>					
Chilled to 40° F	<input checked="" type="checkbox"/>					
Tamper Seal		<input checked="" type="checkbox"/>				
Type of Container						
Additional Comments:						

**White Buffalo Environmental Services, Inc.**

**5425 Ben Ficklin Road San Angelo, Texas 76904**  
**Phone: 325-651-9054 Fax: 325-651-2125**

Client (Name):		Range											
Address:													
City, State, Zip:													
Telephone:													
Fax:													
W.B.E.S. Lab No.	Date	Time	Comp. Grab.	Sample Description	No. of Samples	Type of Container	BTEX	TRPH N/M	TCLP	RCRA Metals	TDS	PAH	CHLORIDES
06-	3/29	9:20	X	Floor composite	1	glass	X	X					X
06-													
06-													
06-													
06-													
06-													
06-													
06-													
06-													
06-													
06-													
06-													
06-													
Sampled By: Signature	Date: 3/29/06	Time: 9:20 A			Temp.	Witnessed By: Signature...	Date:	Time:					
Relinquished By: Signature	Date: 3/29/06	Time: 8:00 A			Temp.	Received By: Signature...	Date:	Time:					
Relinquished By: Signature	Date: 3/29/06	Time: 8:00 A			Temp.	Received for Laboratory By: Signature...	Date:	Time:					

Range New Mexico  
3-29-06  
Spill Cleanup  
Loving, Eddy County, New Mexico





May 5, 2006

NMOCD District 2 Office  
Oil Conservation Division  
Mike Bratcher  
1301 West Grand  
Artesia, New Mexico 88210

RE: Letter of Violation for Range Operating New Mexico, Inc. Inspection, South  
Culebra Bluff (SCB) Unit No. 003

**Chronology**

On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range -Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained. The site was assessed for a formal work plan and specific site information obtained.

On March 29, 2006 after receiving notice from Tony Tucker, Range Resources Production Foreman Loving New Mexico Area., of completion of excavation and remediation; Ronnie Taylor of White Buffalo Environmental Services Inc arrived on site to perform final sampling. A sample was collected from the floor area of the spill site. The sample was immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The sample was analyzed for BTEX, TPH (NM 8015N), and Chloride content.

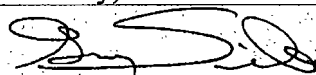
On April 10, 2006 the sample results were received from the laboratory. The results revealed that the BTEX, and TPH concentrations were above remediation limits. Further excavation will be performed and a future sampling date will be coordinated with you.

On April 13, 2006, Ronnie Taylor with WBESI performed additional sampling. The samples were immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The samples were analyzed for BTEX, TPH (NM 8015N), and Chloride content.

One April 19, 2006 the sample results were received from the laboratory. The results again revealed that the BTEX, and TPH concentrations were above remediation limits. Further excavation will be performed and a future sampling date will be coordinated with you.

Please review the attached results and notify me via letter or email if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Swindle", written over a horizontal line.

Greg Swindle,  
President  
WBESI

Enclosures:

Laboratory results  
Photographs

# ASK Laboratories, Inc.

Analytical Services Kwik!

ASK LABORATORIES, INC.  
5935 GLENOAK LANE  
AMARILLO, TEXAS 79109

Attn: CUSTOMER SERVICES  
Phone: (806) 353-4425

WHITE BUFFALO ENVIRO. SERVICE  
5425 BEN FICKLIN ROAD  
SAN ANGELO, TX 76904

Attn: GREG SWINDLE

Order #: 06-04-037  
Date: 04/19/06 14:30  
Work ID: SCB 23 #3B S1-S3  
Date Received: 04/14/06  
Date Completed: 04/19/06


Purchase Order: RANGE OPERATING, LOVING NM  
Invoice Number:

Client Code: WHITE\_BUFF

## SAMPLE IDENTIFICATION

<u>Sample Number</u>	<u>Sample Description</u>
01	SCB 23 #3B S1
02	SCB 23 #3B S2

<u>Sample Number</u>	<u>Sample Description</u>
03	SCB 23 #3B S3

  
\_\_\_\_\_  
Certified By  
ALAN D. KING

5935 Glenoak Lane  
Amarillo, Texas 79109  
Telephone (806) 353-4425  
Toll Free 1-800-423-9443  
Facsimile (806) 352-6454

# ASK Laboratories, Inc.

## Analytical Services Kwik!

Order # 06-04-037  
04/19/06 14:30

ASK LABORATORIES, INC.

Page 2

### TEST RESULTS BY SAMPLE

Sample: 01A SCB 23 #3B S1

Collected: 04/13/06 09:15

Test Description	Result	SOL	Units	Analyzed	By
PERCENT SOLIDS - DRY WT.	94.84		wt % solids	04/17/06	BJP
CHLORIDE ON SOLIDS	4390	100	mg/kg	04/18/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<33.5	33.5	mg/kg	04/18/06	BNH
TPH C12-C28 - DRO	2580	33.5	mg/kg	04/18/06	BNH
TPH C28-C35	629	33.5	mg/kg	04/18/06	BNH
BTEX					
BENZENE	<0.021	0.021	mg/kg	04/17/06	KDJ
TOLUENE	<0.021	0.021	mg/kg	04/17/06	KDJ
ETHYLBENZENE	<0.021	0.021	mg/kg	04/17/06	KDJ
XYLENE	0.046	0.021	mg/kg	04/17/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	99	Min: 80	Max: 120		

Sample: 02A SCB 23 #3B S2

Collected: 04/13/06 09:15

Test Description	Result	SOL	Units	Analyzed	By
PERCENT SOLIDS - DRY WT.	97.99		wt % solids	04/17/06	BJP
CHLORIDE ON SOLIDS	7360	100	mg/kg	04/18/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<32.7	32.7	mg/kg	04/18/06	BNH
TPH C12-C28 - DRO	999	32.7	mg/kg	04/18/06	BNH
TPH C28-C35	240	32.7	mg/kg	04/18/06	BNH
BTEX					
BENZENE	<0.018	0.018	mg/kg	04/17/06	KDJ
TOLUENE	<0.018	0.018	mg/kg	04/17/06	KDJ
ETHYLBENZENE	<0.018	0.018	mg/kg	04/17/06	KDJ
XYLENE	<0.018	0.018	mg/kg	04/17/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	102	Min: 80	Max: 120		

# ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-04-037  
04/19/06 14:30

ASK LABORATORIES, INC.

Page 3

## TEST RESULTS BY SAMPLE

Sample: 03A SCB 23 #3B S3

Collected: 04/13/06 09:15

Test Description	Result	SQL	Units	Analyzed	By
PERCENT SOLIDS - DRY WT.	97.84		wt % solids	04/17/06	BJP
CHLORIDE ON SOLIDS	10800	100	mg/kg	04/18/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<32.4	32.4	mg/kg	04/18/06	BNH
TPH C12-C28 - DRO	667	32.4	mg/kg	04/18/06	BNH
TPH C28-C35	146	32.4	mg/kg	04/18/06	BNH
BTEX					
BENZENE	<0.020	0.020	mg/kg	04/17/06	KDJ
TOLUENE	<0.020	0.020	mg/kg	04/17/06	KDJ
ETHYLBENZENE	<0.020	0.020	mg/kg	04/17/06	KDJ
XYLENE	<0.020	0.020	mg/kg	04/17/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	101	Min: 80	Max: 120		

## QA/QC INFORMATION

	LCS	MS	MSD	RPD	BLANK
MTBE	91%	93%	103%	10.7%	bdl
BENZENE	97%	93%	93%	0.3%	bdl
TOLUENE	89%	86%	85%	1.5%	bdl
ETHYLBENZENE	92%	89%	89%	0.9%	bdl
o-XYLENE	93%	88%	88%	0.8%	bdl
m,p-XYLENES	89%	91%	90%	1.2%	bdl

METHOD	LCS	MS	MSD	RPD	BLANK
8015					
TPH	98%	79%	76%	1.8%	bdl

COMPOUND	RPD	SPIKE RECOVERY	QC RECOVERY	BLANK
CHLORIDE	0.3%	91%	95%	bdl

bdl = below detectable levels

5935 Glenoak Lane  
Amarillo, Texas 79109  
Telephone (806) 353-4425  
Toll Free 1-800-423-9443  
Facsimile (806) 352-6454

# ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-04-037  
04/19/06 14:30

ASK LABORATORIES, INC.

Page 4

## TEST METHODOLOGIES

TEST CODE : SOLIDS

TEST NAME : PERCENT SOLIDS FOR DRY WT CORRECTIONS

REFERENCE CLP PROTOCOL/ SECTION IV/ PART F

TEST CODE : 8015N

TEST NAME : TRPH-8015M (GRO, DRO, C28-35)

METHOD 8015M GCFID GAS CHROMATOGRAPHY WITH FLAME-  
IONIZATION DETECTOR. SW-846 TEST METHODS FOR  
EVALUATING SOLID WASTES.

TEST CODE : BTEX

TEST NAME : BTEX

METHOD 8260 GC/MS GAS CHROMATOGRAPHY WITH MASS-  
SELECTIVE DETECTOR. SW-846 TEST METHODS FOR  
EVALUATING SOLID WASTES.

TEST CODE : CL\_SOL

TEST NAME : CHLORIDE ON SOLID

METHOD 300.0 : ION CHROMATOGRAPHY  
METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES,

METHOD 9056 ION CHROMATOGRAPHY  
SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.

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Amarillo, Texas 79109  
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# ASK Laboratories

Analytical Services Kwik!

5935 Glenoak Lane  
Amarillo, Texas 79109  
Telephone: (806) 353-4425  
Facsimile: (806) 352-6454

# Chain of Custody Record

Work Order No.

Client Name White Buffalo Environmental  
Project I.D./Location Range Overlook  
Address 5425 Ben Ficklin Rd San Angelo, TX 76901  
Telephone (325) 651-9054  
Sampled By Ronnie Taylor

Please note: Liability and Damages. ASK Laboratories liability and clients exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims, including those for negligence and other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories within thirty days of the applicable service. In no event shall ASK Laboratories be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by the client, its subsidiaries, affiliates, or successors arising out of or related to the performance of services rendered by ASK Laboratories, regardless of whether such claims is based upon any of the preceding stated reasons or otherwise.

Sample #	Date	Time	Matrix	Composite	Grab	Sample Description	No. of Containers	Analysis Required	Remarks
01	4-13-06	9:15a	Soil		X	SCB 23 #3B S1	1	X	Glass
02			↓		X	SCB 23 #3B S2	1	X	↓
03					X	SCB 23 #3B S3	1	X	
04									
05									
06									
07									
08									
09									
10									

Relinquished by: (Signature)	Date	Time	Received by: (Signature)
<u>Ronnie Taylor</u>	4-13-06	1030p	<u>BUS</u>
Relinquished by: (Signature)	Date	Time	Received by: (Signature)
<u>BUS</u>	4-14-06	0705	<u>ADK</u>
Relinquished by: (Signature)	Date	Time	Received by: (Signature)

Client Agrees to:	Remarks:
Accept Returned Sample	Headspace
Pay for sample Disposal (\$30 per 100 grams)	Property Sealed
Client's Signature	Chilled to 40° F
	Tamper Seal
	Type of Container
	Additional Comments:

Yes	No	If Yes, Amt.	If No, Explain
<input checked="" type="checkbox"/>	<input type="checkbox"/>	1/2"	
<input checked="" type="checkbox"/>	<input type="checkbox"/>		
<input checked="" type="checkbox"/>	<input type="checkbox"/>		
<input type="checkbox"/>	<input checked="" type="checkbox"/>		

# Login Checklist

Order # 0604037

Shipping Method: BUS

Date/Time of Receipt: 4-14 0705

## Cooler Check

Shipping Container	Ice in Cooler			Custody Seal				Tracking Number
			If No,	Present?		Intact?		
	Yes	No	Temperature	Yes	No	Yes	No	
Coat	X				X			

Note: If the temperature of a cooler/sample is above 6°C fill out NCR.

## Custody Seals on Bottles Present:

Yes \_\_\_\_\_ No X

If Yes, is it intact?

Yes \_\_\_\_\_ No \_\_\_\_\_

If Not intact, fill out NCR

## Condition of Containers:

Loose Caps:

Yes \_\_\_\_\_ No X

If Yes, fill out NCR

Broken Containers:

Yes \_\_\_\_\_ No X

If Yes, fill out NCR

## Chain of Custody Included:

Yes X No \_\_\_\_\_

If Yes, verify receipt of all containers listed and all required fields are complete. Sign and Date COC and fill out laboratory boxes. Document any discrepancies on NCR.

Acid Preserved Samples: pH<=2

Yes \_\_\_\_\_ No N/A

If No, fill out NCR

Base Preserved Samples: pH>=12

Yes \_\_\_\_\_ No \_\_\_\_\_

If No, fill out NCR

Coolers Unpacked/Checked by: [Signature]

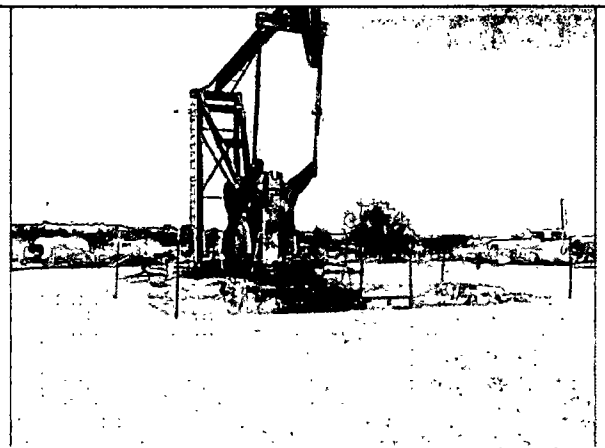
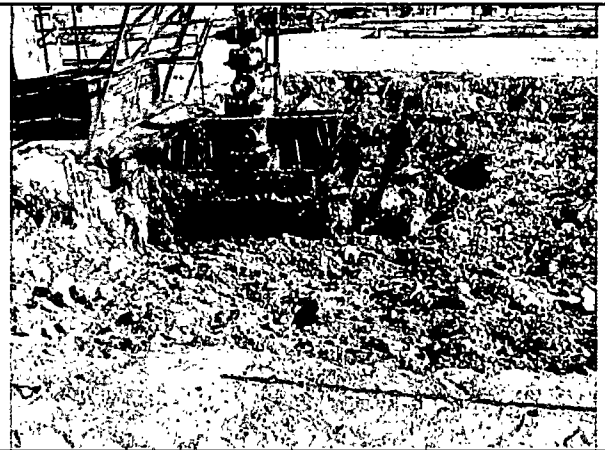
Date: 4-14

NCRs (y/n): ✓

Faxed Confirmation (y/n): \_\_\_\_\_



Site Photographs  
SCB 23-3  
4-13-2006



# ASK Laboratories, Inc.

Analytical Services Kwik!

ASK LABORATORIES, INC.  
5935 GLENOAK LANE  
AMARILLO, TEXAS 79109

Attn: CUSTOMER SERVICES  
Phone: (806) 353-4425

WHITE BUFFALO ENVIRO. SERVICE  
5425 BEN FICKLIN ROAD  
SAN ANGELO, TX 76904


Attn: GREG SWINDLE  
Invoice Number:

Order #: 06-05-091  
Date: 05/30/06 13:15  
Work ID: RANGE SCB 23-3/S1 THRU S3  
Date Received: 05/24/06  
Date Completed: 05/30/06  
Client Code: WHITE\_BUFF

## SAMPLE IDENTIFICATION

<u>Sample Number</u>	<u>Sample Description</u>
01	SCB 23-3 S1
02	SCB 23-3 S2

<u>Sample Number</u>	<u>Sample Description</u>
03	SCB 23-3 S3

Certified By 

Alan D. King

5935 Glenoak Lane  
Amarillo, Texas 79109  
Telephone (806) 353-4425  
Toll Free 1-800-423-9443  
Facsimile (806) 352-6454

# ASK Laboratories, Inc.

## Analytical Services Kwik!

Order # 06-05-091  
05/30/06 13:15

ASK LABORATORIES, INC.

Page 2

### TEST RESULTS BY SAMPLE

Sample: 01A SCB 23-3 S1

Collected: 05/22/06 10:40

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS DRY WEIGHT	99.25		wt % solids	05/24/06	JAC
CHLORIDE ON SOLIDS	4900	5.0	mg/kg	05/25/06	BNH
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	<29.8	29.8	mg/kg	05/26/06	BNH
TPH C12-C28 - DRO	132	29.8	mg/kg	05/26/06	BNH
TPH C28-C35	<29.8	29.8	mg/kg	05/26/06	BNH
BTEX					
BENZENE	<0.020	0.020	mg/kg	05/25/06	KDJ
TOLUENE	<0.020	0.020	mg/kg	05/25/06	KDJ
ETHYLBENZENE	<0.020	0.020	mg/kg	05/25/06	KDJ
XYLENE	<0.020	0.020	mg/kg	05/25/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	91	Min: 80		Max: 120	

Sample: 02A SCB 23-3 S2

Collected: 05/22/06 10:43

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS DRY WEIGHT	98.07		wt % solids	05/24/06	JAC
CHLORIDE ON SOLIDS	4280	5.0	mg/kg	05/25/06	BNH
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	<31.2	31.2	mg/kg	05/26/06	BNH
TPH C12-C28 - DRO	199	31.2	mg/kg	05/26/06	BNH
TPH C28-C35	<31.2	31.2	mg/kg	05/26/06	BNH
BTEX					
BENZENE	<0.015	0.015	mg/kg	05/25/06	KDJ
TOLUENE	<0.015	0.015	mg/kg	05/25/06	KDJ
ETHYLBENZENE	<0.015	0.015	mg/kg	05/25/06	KDJ
XYLENE	<0.015	0.015	mg/kg	05/25/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	95	Min: 80		Max: 120	

# ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-05-091  
05/30/06 13:15

ASK LABORATORIES, INC.

Page 3

## TEST RESULTS BY SAMPLE

Sample: 03A SCB 23-3 S3

Collected: 05/22/06 10:45

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS DRY WEIGHT	98.11		wt % solids	05/24/06	JAC
CHLORIDE ON SOLIDS	4440	5.0	mg/kg	05/25/06	BNH
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	<30.8	30.8	mg/kg	05/26/06	BNH
TPH C12-C28 - DRO	179	30.8	mg/kg	05/26/06	BNH
TPH C28-C35	<30.8	30.8	mg/kg	05/26/06	BNH
BTEX					
BENZENE	<0.015	0.015	mg/kg	05/25/06	KDJ
TOLUENE	<0.015	0.015	mg/kg	05/25/06	KDJ
ETHYLBENZENE	<0.015	0.015	mg/kg	05/25/06	KDJ
XYLENE	<0.015	0.015	mg/kg	05/25/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	98	Min: 80		Max: 120	

5935 Glenoak Lane  
Amarillo, Texas 79109  
Telephone (806) 353-4425  
Toll Free 1-800-423-9443  
Facsimile (806) 352-6454

# ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-05-091  
05/30/06 13:15

ASK LABORATORIES, INC.

Page 4

## QA/QC INFORMATION

	LCS	MS	MSD	RPD	BLANK
BENZENE	103%	103%	109%	5.0%	bd1
TOLUENE	95%	90%	98%	7.4%	bd1
ETHYLBENZENE	101%	104%	113%	8.1%	bd1
m,p-XYLENES	103%	103%	114%	9.8%	bd1
o-XYLENE	99%	103%	116%	11.8%	bd1
TX1005	LCS	MS	MSD	RPD	BLANK
TPH	106%	93%	84%	9.3%	bd1
COMPOUND	RPD	SPIKE RECOVERY	QC RECOVERY	BLANK	
CHLORIDE	0.2%	91%	93%	bd1	

bd1=below detectable levels

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Amarillo, Texas 79109  
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Toll Free 1-800-423-9443  
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# ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-05-091  
05/30/06 13:15

ASK LABORATORIES, INC.

Page 5

## TEST METHODOLOGIES

TEST CODE : SOLIDS

TEST NAME : PERCENT SOLIDS FOR DRY WT CORRECTIONS

REFERENCE CLP PROTOCOL/ SECTION IV/ PART F

TEST CODE : 8015N

TEST NAME : TRPH-8015M (GRO, DRO, C28-35)

METHOD 8015M GCFID GAS CHROMATOGRAPHY WITH FLAME-  
IONIZATION DETECTOR. SW-846 TEST METHODS FOR  
EVALUATING SOLID WASTES.

TEST CODE : BTEX

TEST NAME : BTEX

METHOD 8260 GC/MS GAS CHROMATOGRAPHY WITH MASS-  
SELECTIVE DETECTOR. SW-846 TEST METHODS FOR  
EVALUATING SOLID WASTES.

TEST CODE : CL\_SOL

TEST NAME : CHLORIDE ON SOLID

METHOD 300.0 : ION CHROMATOGRAPHY  
METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES,  
EPA-600/4-79-020

METHOD 9056 ION CHROMATOGRAPHY  
SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.

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Amarillo, Texas 79109  
Telephone (806) 353-4425  
Toll Free 1-800-423-9443  
Facsimile (806) 352-6454

# ASK Laboratories

Analytical Services Kwik!

5935 Glenoak Lane  
Amarillo, Texas 79109  
Telephone: (806) 353-4425  
Facsimile: (806) 352-6454

# Chain of Custody Record

Work Order No.

Client Name White Buffalo Environmental

Project I.D./Location Range

Address 5425 Ben Ficklin Rd. San Angelo, TX

Telephone (325) 651-9054

Sampled By Bonnie Taylor

Please note: Liability and Damages. ASK Laboratories liability and clients exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims, including those for negligence and other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories within thirty days of the applicable service. In no event shall ASK Laboratories be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits, incurred by the client, its subsidiaries, affiliates, or successors arising out of or related to the performance of services rendered by ASK Laboratories, regardless of whether such claims is based upon any of the preceding stated reasons or otherwise.

Sample #	Date	Time	Matrix	Composite	Grab	Sample Description	No. of Containers	Analysis Required	Remarks
01	5/22/06	10:40	Soil		X	SCB 23-3 S1	1	X	
02	↓	10:43	↓		X	SCB 23-3 S2	1	X	
03	↓	10:45	↓		X	SCB 23-3 S3	1	X	
04									
05									
06									
07									
08									
09									
10									

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
<i>[Signature]</i>	5/23/06	8:00A	<i>[Signature]</i>	5/23/06	8:00A
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
<i>[Signature]</i>	5/23/06	16:30	BUS	5/23/06	16:30
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
<i>[Signature]</i>	5/24/06	8:55	<i>[Signature]</i>	5/24/06	8:55

Client Agrees to:

Accept Returned Sample

Pay for sample Disposal (\$30 per 100 grams)

Client's Signature \_\_\_\_\_

Remarks:

Headspace: Yes ☒ No ☐

Property Sealed: Yes ☒ No ☐

Chilled to 40° F: Yes ☒ No ☐

Tamper Seal: Yes ☒ No ☐

Type of Container: 5/455

Additional Comments: \_\_\_\_\_

# Login Checklist

Order # 0605092

Shipping Method: Bus

Date/Time of Receipt: 5-24-06  
8:50 AM

## Cooler Check

Shipping Container	Ice in Cooler		If No, Temperature	Custody Seal		Present?	Intact?	Tracking Number
	Yes	No		Yes	No	Yes	No	
<u>Cooler</u>	<u>X</u>				<u>X</u>			<u>828796</u>

Note: If the temperature of a cooler/sample is above 6°C fill out NCR.

## Custody Seals on Bottles Present:

If Yes, is it intact?

If Not intact, fill out NCR

Yes X

Yes X

No \_\_\_\_\_

No \_\_\_\_\_

## Condition of Containers:

Loose Caps:

If Yes, fill out NCR

Yes \_\_\_\_\_

No X

Broken Containers:

If Yes, fill out NCR

Yes \_\_\_\_\_

No X

## Chain of Custody Included:

If Yes, verify receipt of all containers listed and all required fields are complete. Sign and Date COC and fill out laboratory boxes. Document any discrepancies on NCR.

Yes X

No \_\_\_\_\_

## Acid Preserved Samples: pH<=2

If No, fill out NCR

Yes \_\_\_\_\_

No \_\_\_\_\_

## Base Preserved Samples: pH>=12

If No, fill out NCR

Yes \_\_\_\_\_

No \_\_\_\_\_

Coolers Unpacked/Checked by: S. King

Date: 5-24-06

NCRs (y/n): N

Faxed Confirmation (y/n): N



PRESS HARD

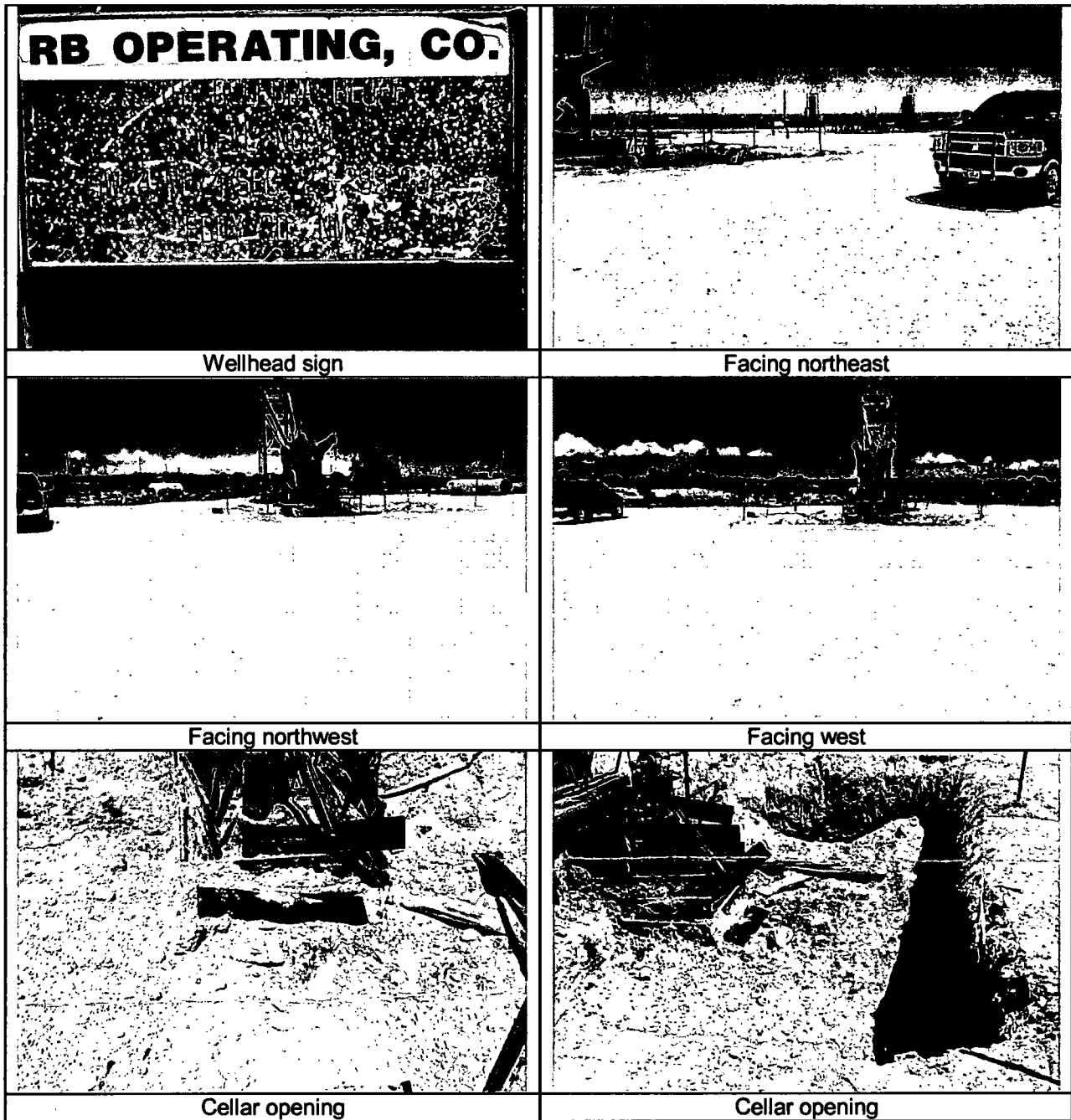


50M 2/00

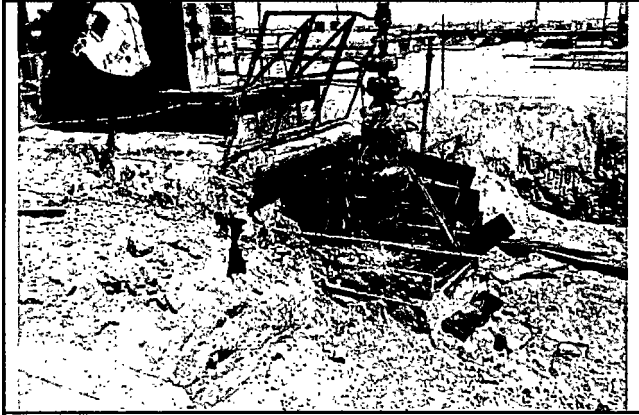
PLEASE PRINT  
USE BALL POINT PEN!

<b>KERRVILLE BUS COMPANY</b> 1430 E. HOUSTON ST. SAN ANTONIO, TEXAS 78202 DESTINATION STATION CITY & STATE				CARRIER <b>164</b> IN <b>MO</b> <b>6</b> DAY <b>22</b> YEAR <b>67</b> TIME <b>4:46</b> AM <b>6:35</b>				FORWARDING AGENT <b>TH</b> PICK-UP AGENT				FORWARDING AGENCY NO. <b>828796</b>			
FROM (Shipper's Name) <b>AMC 1110, TX</b> 1430 E. HOUSTON ST. SAN ANTONIO, TX 78202 PHONE NUMBER <b>79109</b>				TO (Recipient's Name) <b>ASK LABS (800) 353-4425</b> 1430 E. HOUSTON ST. SAN ANTONIO, TX 78202 PHONE NUMBER <b>79109</b>				CHARGE ACCOUNT NO. <b>79109</b>				C.O.D.			
LENGTH X WIDTH X HEIGHT <b>11 X 11 X 11</b>				DIMENSIONS WGT COMPUTATION <b>11 X 11 X 11 = 1331</b>				DIMENSIONS WGT. (LBS.) <b>10</b>				NO. OF PIECES <b>1</b>			
TYPE OF CONTAINER <input type="checkbox"/> EMT <input type="checkbox"/> BOX <input type="checkbox"/> SACK <input type="checkbox"/> CTR <input type="checkbox"/> OTHER				ACTUAL WGT. (LBS.) <b>28.45</b>				C.O.D. AMOUNT <b>28.45</b>				TOTAL			
LABEL/DELIVERY				PICK-UP				DELIVERY				STORAGE			
OTHER				C.O.D. AMOUNT				TOTAL				TOTAL			

Range New Mexico  
5-17-06  
Spill Cleanup  
Loving, Eddy County, New Mexico



Range New Mexico  
5-17-06  
Spill Cleanup  
Loving, Eddy County, New Mexico



Cellar opening

**CONTROLLED RECOVERY, INC.**

P.O. Box 388 • Hobbs, New Mexico 88241-0388

(505) 393-1079

www.crihobbs.com

Bill to \_\_\_\_\_

Address \_\_\_\_\_

Company/Generator RangeLease Name SCB #3Trucking Company CN Vehicle Number 1 Driver (Print) RayDate 3-29-06 Time 8:50 a.m. p.m.**Type of Material**☐ Exempt☐ Tank Bottoms☐ Fluids☐ Non-Exempt

C117 \_\_\_\_\_

☐ Other Material

C138 \_\_\_\_\_

☐ Soils

List Description Below

**DESCRIPTION**Cont. SoilVolume of Material ☐ Bbls. \_\_\_\_\_ ☒ Yard 10 ☐ Gallons \_\_\_\_\_☐ Wash Out☐ Call Out☐ After Hours☐ Debris Charge**This statement applicable to exempt waste only.**

I represent and warrant that the wastes are: generated from oil and gas exploration and production operations: exempt from Resource Conservation and Recover Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt wastes.

Agent Ray Travers  
(Signature)CRI Representative J. Wallace  
(Signature)**TANK BOTTOMS**

	Feet	Inches			
1st Gauge			BBLS Received		BS&W %
2nd Gauge			Free Water		
Received			Total Received		

**83795**

White - CRI

Canary - CRI Accounting

Pink - CRI Plant

Gold - Transporter

The Print Shop #7521

**CONTROLLED RECOVERY, INC.**

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Bill to \_\_\_\_\_

Address \_\_\_\_\_

Company/Generator RoyceLease Name SCB #3Trucking Company Grando's Vehicle Number 1 Driver (Print) RandyDate 3-29-06 Time 9:20 a.m. / p.m.**Type of Material**☐ Exempt☐ Tank Bottoms☐ Fluids☐ Non-Exempt

C117 \_\_\_\_\_

☐ Other Material

C138 \_\_\_\_\_

☐ Soils

List Description Below

**DESCRIPTION**Cont. SoilVolume of Material ☐ Bbls. \_\_\_\_\_ ☒ Yard 8 ☐ Gallons \_\_\_\_\_☐ Wash Out☐ Call Out☐ After Hours☐ Debris Charge**This statement applicable to exempt waste only.**

I represent and warrant that the wastes are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recover Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt wastes.

Agent R. Marshall  
(Signature)CRI Representative [Signature]  
(Signature)**TANK BOTTOMS**

Feet

Inches

1st Gauge

BBLS Received

BS&amp;W

%

2nd Gauge

Free Water

Received

Total Received

**83799**

White - CRI

Canary - CRI Accounting

Pink - CRI Plant

Gold - Transporter

The Print Shop #7521

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Bill to \_\_\_\_\_

Address \_\_\_\_\_

Company/Generator RangeLease Name SCB #3Trucking Company Grando Vehicle Number 1 Driver (Print) RandyDate 3-28-06 Time 3:05 a.m. ☒ p.m.**Type of Material**☐ Exempt☐ Tank Bottoms☐ Fluids☐ Non-Exempt

C117 \_\_\_\_\_

☐ Other Material

C138 \_\_\_\_\_

☐ Soils

List Description Below

**DESCRIPTION**Cont. SoilVolume of Material ☐ Bbls. \_\_\_\_\_ ☒ Yard 12 ☐ Gallons \_\_\_\_\_☐ Wash Out☐ Call Out☐ After Hours☐ Debris Charge**This statement applicable to exempt waste only.**

I represent and warrant that the wastes are: generated from oil and gas exploration and production operations: exempt from Resource Conservation and Recover Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt wastes.

Agent [Signature]  
(Signature)CRI Representative [Signature]  
(Signature)**TANK BOTTOMS**

	Feet	Inches		
1st Gauge			BBLS Received	BS&W %
2nd Gauge			Free Water	
Received			Total Received	

**83765**

White - CRI

Canary - CRI Accounting

Pink - CRI Plant

Gold - Transporter

The Print Shop #7521

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Bill to \_\_\_\_\_

Address \_\_\_\_\_

Company/Generator RangeLease Name SCB 3-B-3Trucking Company B:R Vehicle Number 1 Driver (Print) RobertDate 4-12-06 Time 1:05 a.m. ☒ (p.m.)**Type of Material**☐ Exempt☐ Tank Bottoms☐ Fluids☐ Non-Exempt☒ C117 \_\_\_\_\_☐ Other Material

C138 \_\_\_\_\_

☐ Soils

List Description Below

**DESCRIPTION**Volume of Material ☐ Bbls. \_\_\_\_\_ ☒ Yard 20 ☐ Gallons \_\_\_\_\_☐ Wash Out☐ Call Out☐ After Hours☐ Debris Charge**This statement applicable to exempt waste only.**

I represent and warrant that the wastes are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt wastes.

Agent [Signature]  
(Signature)CRI Representative [Signature]  
(Signature)**TANK BOTTOMS**

Feet

Inches

1st Gauge

BBLS Received

BS&amp;W

%

2nd Gauge

Free Water

Received

Total Received

**84865**

White - CRI

Canary - CRI Accounting

Pink - CRI Plant

Gold - Transporter

The Print Shop #7521

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Bill to \_\_\_\_\_

Address \_\_\_\_\_

Company/Generator RangeLease Name SCB 13-B-3Trucking Company B<sup>2</sup>R Vehicle Number 3 Driver (Print) ChadDate 4-12-06 Time 9:25 a.m. / p.m.**Type of Material**☐ Exempt☐ Tank Bottoms☐ Fluids☐ Non-Exempt☐ C117 \_\_\_\_\_☐ Other Material

C138 \_\_\_\_\_

☐ Soils

List Description Below

**DESCRIPTION**Cont. SoilVolume of Material ☐ Bbls. \_\_\_\_\_ ☒ Yard 24 ☐ Gallons \_\_\_\_\_☐ Wash Out☐ Call Out☐ After Hours☐ Debris Charge**This statement applicable to exempt waste only.**

I represent and warrant that the wastes are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recover Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt wastes.

Agent Chad James  
(Signature)CRI Representative J. Wallen  
(Signature)**TANK BOTTOMS**

	Feet	Inches		
1st Gauge			BBLS Received	BS&W %
2nd Gauge			Free Water	
Received			Total Received	

**84825**

White - CRI

Canary - CRI Accounting

Pink - CRI Plant

Gold - Transporter

The Print Shop #7521



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Bill to \_\_\_\_\_

Address \_\_\_\_\_

Company/Generator RangeLease Name SCB 3 B-3Trucking Company BIR Vehicle Number 1 Driver (Print) RobertDate 4-12-06 Time 10:53 a.m./p.m.**Type of Material**☐ Exempt☐ Tank Bottoms☐ Fluids☐ Non-Exempt

C117 \_\_\_\_\_

☐ Other Material

C138 \_\_\_\_\_

☐ Soils

List Description Below

**DESCRIPTION**Cont. SoilVolume of Material ☐ Bbls. \_\_\_\_\_ ☒ Yard 24 ☐ Gallons \_\_\_\_\_☐ Wash Out☐ Call Out☐ After Hours☐ Debris Charge**This statement applicable to exempt waste only.**

I represent and warrant that the wastes are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recover Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt wastes.

Agent [Signature]  
(Signature)CRI Representative [Signature]  
(Signature)**TANK BOTTOMS**

	Feet	Inches		
1st Gauge			BBLS Received	BS&W %
2nd Gauge			Free Water	
Received			Total Received	

**84841**

White - CRI

Canary - CRI Accounting

Pink - CRI Plant

Gold - Transporter

The Print Shop #7521

**CONTROLLED RECOVERY, INC.**

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(505) 393-1079

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Bill to \_\_\_\_\_

Address \_\_\_\_\_

Company/Generator RengeLease Name SCB 3 B-3Trucking Company B-R Vehicle Number 1 Driver (Print) RobertDate 4-12-06 Time 3:45 a.m. / p.m.**Type of Material**☐ Exempt☐ Tank Bottoms☐ Fluids☐ Non-Exempt

C117 \_\_\_\_\_

☐ Other Material

C138 \_\_\_\_\_

☐ Soils

List Description Below

**DESCRIPTION**Cont. SoilVolume of Material ☐ Bbls. \_\_\_\_\_ ☒ Yard 24 ☐ Gallons \_\_\_\_\_☐ Wash Out☐ Call Out☐ After Hours☐ Debris Charge**This statement applicable to exempt waste only.**

I represent and warrant that the wastes are: generated from oil and gas exploration and production operations: exempt from Resource Conservation and Recover Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt wastes.

Agent [Signature]  
(Signature)CRI Representative [Signature]  
(Signature)**TANK BOTTOMS**

	Feet	Inches		
1st Gauge			BBLS Received	BS&W %
2nd Gauge			Free Water	
Received			Total Received	

**84891**

White - CRI

Canary - CRI Accounting

Pink - CRI Plant

Gold - Transporter

The Print Shop #7521

**CONTROLLED RECOVERY, INC.**

P.O. Box 388 • Hobbs, New Mexico 88241-0388

(505) 393-1079

www.crihobbs.com

Bill to \_\_\_\_\_

Address \_\_\_\_\_

Company/Generator RangeLease Name SCB # 3Trucking Company B+R Vehicle Number 9 Driver (Print) DanielDate 5/18/06 Time 10:00 a.m. p.m.**Type of Material**☐ Exempt☐ Tank Bottoms☐ Fluids☐ Non-Exempt

C117 \_\_\_\_\_

☐ Other Material

C138 \_\_\_\_\_

☒ Soils

List Description Below

**DESCRIPTION**Cont. SoilVolume of Material ☐ Bbls. \_\_\_\_\_ ☒ Yrd 12 ☐ Gallons \_\_\_\_\_☐ Wash Out☐ Call Out☐ After Hours☐ Debris Charge**This statement applicable to exempt waste only.**

I represent and warrant that the wastes are: generated from oil and gas exploration and production operations: exempt from Resource Conservation and Recover Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt wastes.

Agent Daniel Ellis  
(Signature)CRI Representative \_\_\_\_\_  
(Signature) John Huggart**TANK BOTTOMS**

	Feet	Inches			
1st Gauge			BBLS Received		BS&W %
2nd Gauge			Free Water		
Received			Total Received		

**87269**

White - CRI

Canary - CRI Accounting

Pink - CRI Plant

Gold - Transporter

The Print Shop #7521

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Bill to \_\_\_\_\_

Address \_\_\_\_\_

Company/Generator RangerLease Name SCB #3Trucking Company B.R. Vehicle Number 9 Driver (Print) DanielDate 5-16-06 Time 11:18 a.m. p.m.**Type of Material**☐ Exempt☐ Tank Bottoms☐ Fluids☐ Non-Exempt☐ C17 \_\_\_\_\_☐ Other Material

C138 \_\_\_\_\_

☐ Soils

List Description Below

**DESCRIPTION**Cont. SoilVolume of Material ☐ Bbls. \_\_\_\_\_ ☒ Yard 12 ☐ Gallons \_\_\_\_\_☐ Wash Out☐ Call Out☐ After Hours☐ Debris Charge**This statement applicable to exempt waste only.**

I represent and warrant that the wastes are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recover Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt wastes.

Agent Daniel Ellis  
(Signature)CRI Representative J. Palmer  
(Signature)**TANK BOTTOMS**

	Feet	Inches			
1st Gauge			BBLS Received		BS&W %
2nd Gauge			Free Water		
Received			Total Received		

**87011**

White - CRI

Canary - CRI Accounting

Pink - CRI Plant

Gold - Transporter

**The Print Shop** #7521

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Bill to \_\_\_\_\_

Address \_\_\_\_\_

Company/Generator Range Oper.Lease Name SCB #3Trucking Company BAR Vehicle Number 5 Driver (Print) CodyDate 5/16/06 Time 8:00 a.m. / p.m.**Type of Material**☐ Exempt☐ Tank Bottoms☐ Fluids☐ Non-ExemptC117☐ Other Material

C138 \_\_\_\_\_

☒ Soils

List Description Below

**DESCRIPTION**Cont. SoilVolume of Material ☐ Bbls. \_\_\_\_\_ ☒ Yard 12 ☐ Gallons \_\_\_\_\_☐ Wash Out☐ Call Out☐ After Hours☐ Debris Charge**This statement applicable to exempt waste only.**

I represent and warrant that the wastes are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recover Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt wastes.

Agent Kenny [Signature]  
(Signature)CRI Representative John T. Shugart  
(Signature)**TANK BOTTOMS**

	Feet	Inches			
1st Gauge			BBLS Received		BS&W %
2nd Gauge			Free Water		
Received			Total Received		

**86988**

White - CRI

Canary - CRI Accounting

Pink - CRI Plant

Gold - Transporter

**The Print Shop** #7521

**CONTROLLED RECOVERY, INC.**

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(505) 393-1079

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Bill to \_\_\_\_\_

Address \_\_\_\_\_

Company/Generator Range OperLease Name SCR #3Trucking Company BSR Vehicle Number 9 Driver (Print) DanielDate 5/16/06 Time 8:30 a.m. p.m.**Type of Material**☐ Exempt☐ Tank Bottoms☐ Fluids☐ Non-Exempt

C117 \_\_\_\_\_

☐ Other Material

C138 \_\_\_\_\_

☒ Soils

List Description Below

**DESCRIPTION**Cont SoilVolume of Material ☐ Bbls. \_\_\_\_\_ ☒ Yard 12 ☐ Gallons \_\_\_\_\_☐ Wash Out☐ Call Out☐ After Hours☐ Debris Charge**This statement applicable to exempt waste only.**

I represent and warrant that the wastes are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recover Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt wastes.

Agent Daniel Ellis  
(Signature)CRI Representative John T. Shugart  
(Signature)**TANK BOTTOMS**

	Feet	Inches		
1st Gauge			BBLS Received	BS&W %
2nd Gauge			Free Water	
Received			Total Received	

**86989**

White - CRI

Canary - CRI Accounting

Pink - CRI Plant

Gold - Transporter

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(505) 393-1079

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Bill to \_\_\_\_\_

Address \_\_\_\_\_

Company/Generator RangeLease Name SCB #3Trucking Company B:R Vehicle Number 9 Driver (Print) DanielDate 5-16-06 Time 9:42 a.m. / p.m.**Type of Material**☐ Exempt☐ Tank Bottoms☐ Fluids☐ Non-Exempt☒ C17☐ Other Material

C138 \_\_\_\_\_

☐ Soils

List Description Below

**DESCRIPTION**Cont. SoilVolume of Material ☐ Bbls. \_\_\_\_\_ ☒ Yard 10 ☐ Gallons \_\_\_\_\_☐ Wash Out☐ Call Out☐ After Hours☐ Debris Charge**This statement applicable to exempt waste only.**

I represent and warrant that the wastes are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recover Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt wastes.

Agent Daniel Ellis  
(Signature)CRI Representative J. Hallan  
(Signature)**TANK BOTTOMS**

	Feet	Inches			
1st Gauge			BBLS Received		BS&W %
2nd Gauge			Free Water		
Received			Total Received		

**86998**

White - CRI

Canary - CRI Accounting

Pink - CRI Plant

Gold - Transporter

The Print Shop #7521

**CONTROLLED RECOVERY, INC.**

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(505) 393-1079

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Bill to \_\_\_\_\_

Address \_\_\_\_\_

Company/Generator ~~DETA~~ *Range*Lease Name *SCB #3*Trucking Company *13412* Vehicle Number *1* Driver (Print) *Robert*Date *5/18/06* Time *9:00* a.m. / p.m.**Type of Material**☐ Exempt☐ Tank Bottoms☐ Fluids☐ Non-Exempt*C117*☐ Other Material

C138 \_\_\_\_\_

☒ Soils

List Description Below

*OCD*  
**DESCRIPTION***Cont. Soil*Volume of Material ☐ Bbls. \_\_\_\_\_ ☒ Yard *20* ☐ Gallons \_\_\_\_\_☐ Wash Out☐ Call Out☐ After Hours☐ Debris Charge**This statement applicable to exempt waste only.**

I represent and warrant that the wastes are: generated from oil and gas exploration and production operations: exempt from Resource Conservation and Recover Act (RCRA) Subtitle C Regulations; and not mixed with non-exempt wastes.

Agent *[Signature]*  
(Signature)CRI Representative *[Signature]*  
(Signature)**TANK BOTTOMS**

Feet

Inches

1st Gauge

BBLS Received

BS&amp;W

%

2nd Gauge

Free Water

Received

Total Received

**87256**

White - CRI

Canary - CRI Accounting

Pink - CRI Plant

Gold - Transporter

**The Print Shop** #7521



## Bratcher, Mike, EMNRD

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**From:** Bratcher, Mike, EMNRD  
**Sent:** Tuesday, February 05, 2013 4:03 PM  
**To:** 'Jerusha Rawlings'  
**Subject:** RE: Unresolved well compliance/spill data

Jerusha,

As we discussed, I believe the 2006 releases attributed to the Candelario #1 actually occurred at the battery for this SWD. The battery is located on the South Culebra Bluff #6 well site. While I was unable to locate any documentation that would allow me to close it out, I do not believe these releases should be of concern.

The South Culebra Bluff #4, I was able to locate documentation that will allow for this incident to be closed out.

The status of the remaining incidents is pretty much unknown. I was unable to locate any documentation that would allow for closure of any of them. The 1999 entry for the South Culebra Bluff 23 #11, I believe is a non-incident.

Hope this helps some.

Mike Bratcher  
NMOCD District 2  
811 S. First Street  
Artesia, NM 88210  
O: 575-748-1283 X108  
C: 575-626-0857  
F: 575-748-9720

---

**From:** Jerusha Rawlings [<mailto:jrawlings@glenvironmental.com>]  
**Sent:** Monday, January 28, 2013 2:58 PM  
**To:** Bratcher, Mike, EMNRD  
**Subject:** Unresolved well compliance/spill data

Mike,

Thanks for taking the time to look at these. The incidents I have questions about are listed below with the wells' API numbers.

### Candelario #001 (30-015-26536)

- 10/6/2006 – a release of oil (all recovered) due to human error. No groundwater was affected, but no closure information was available from OCD online.
- 10/10/2006 – a release of oil (15 bbl unrecovered) due to human error. No groundwater was affected, but no closure information was available from OCD online.

### South Culebra Bluff #004 (30-015-22931)

- 3/7/2009 – a release of produced water (10 bbl unrecovered) due to a fatigued check valve on the well head. According to OCD documents, immediate action was taken, including sampling and analysis of produced water. OCD requested a work plan for further delineation of all constituents of concern. No other information is available and the disposition of the affected area is unknown.

South Culebra Bluff #006 (30-015-23339)

- 7/15/2005 – a release of oil and produced water (20 bbl unrecovered) due to a "water dump valve malfunction on the heater treater dumping water to oil tank." The produced water and oil was contained inside the fenced berm area and recovered by a vacuum truck. The remaining fluids were spread with sand to soak up the oil, but it is not clear whether the sand was disposed of or left in place. During an inspection, it was noted that the north side of the tank battery was covered with fresh soil to an average depth of approximately 6 inches, but contaminated soils remain below the clean soils. A soil sample was taken, but the disposition of the case is unknown.

South Culebra Bluff #003 (30-015-22700)

- 1/25/2011 – a release of produced fluids (40 bbl unrecovered, water/oil proportion unspecified) due to failure of a tank union. According to form C-141, the area affected was inside the firewalls of the tank battery. The disposition of the affected soil is unknown.

South Culebra Bluff 23 #011 (30-015-26346)

- 7/21/1999 – Other than its listing under the "Complaints, Incidents and Spills" section of OCD's well information page, no other information was available.
- 8/21/2006 – a release of oil (5 bbl unrecovered) due to failure of a valve on the pump jack. According to form C-141, a vacuum truck was called immediately and recovered 10 bbl. Approximately 5 bbl soaked into ground. The disposition of this soil is unknown.

Regards,

*Jerusha Rawlings, PhD*



*GL Environmental, Inc.*

*(505) 508-2419 Albuquerque office*

*(505) 385-9594 cell*

*(505) 454-0830 Las Vegas office*

*(505) 454-8093 fax*