

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

August 19, 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. A C-141 Closure Form is attached.

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,

Jason Michelson

Jan Mila

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

Subject:

**Closure Request** 

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

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) dated 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. A C-141 Closure Form is included as Attachment 1.

### 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.

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

**ENVIRONMENTAL** 

Date:

August 20, 2019

Contact:

Rebecca Andresen

Phone:

206-726-4717

Emai

Rebecca.Andresen@arcadis .com

Our ref:

B0049810.0000

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 2.

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 <a href="mailto:rebecca.andresen@arcadis.com">rebecca.andresen@arcadis.com</a>.

Sincerely,

Arcadis U.S., Inc.

Rebecca Andresen Vice President

Copies

Jason Michelson, Chevron/CEMC

### **Attachments**

- 1 C-141 Closure Form
- 2 South Culebra Bluff Unit 3 Reports and Correspondences

Form C-141 Page 6

### State of New Mexico Oil Conservation Division

Incident ID	
District RP	2RP-3984
Facility ID	
Application ID	

### Closure

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

Closure Report Attachment Checklist: Each of the following	items must be included in the closure report.
☐ A scaled site and sampling diagram as described in 19.15.29.	.11 NMAC
Note The Photographs of the remediated site prior to backfill or photomust be notified 2 days prior to liner inspection)	s of the liner integrity if applicable (Note: appropriate OCD District office
☐ Laboratory analyses of final sampling (Note: appropriate OD	OC District office must be notified 2 days prior to final sampling)
□ Description of remediation activities	
and regulations all operators are required to report and/or file certa may endanger public health or the environment. The acceptance of should their operations have failed to adequately investigate and re- human health or the environment. In addition, OCD acceptance of	ations. The responsible party acknowledges they must substantially onditions that existed prior to the release or their final land use in
	Title: _ Project Manager
Signature: June Mille	Date: <u>8/19/2019</u>
email: jmichelson@chevron.com	Telephone: 832-854-5601
OCD Only	
Received by:	Date:
	y of liability should their operations have failed to adequately investigate and water, human health, or the environment nor does not relieve the responsible l/or regulations.
Closure Approved by:	Date:
Printed Name:	Title:



### NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON** 

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Oil Conservation Division

) izid 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

S	O	T	ľ	Ή	(	ľ	П	E.	RR	ł A	RI	J	FF	U	N.	IT	No	.003

G-23-23S-28E

30-015-22700-00-00

Inspection

nspection 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 Divison 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

### 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

Purchase Order: RANGE SCB23 #3-B/

Invoice Number:

Order #: 06-03-131

Date: 04/06/06 09:46

Work ID: FLOOR COMPOSITE Date Received: 03/31/06

Date Completed: 04/06/06

Client Code: WHITE BUFF

### SAMPLE IDENTIFICATION

Sample Sample Number Description

FLOOR COMPOSITE

Sample Number

Description

ALAN D. KING

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

### 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						
Test Description PERCENT SOLIDS - DRY WT.	<u>Result</u> 94.45	SOL	<u>Units</u> wt % solids	<u>Analyzed</u> 03/31/06	<u>By</u> 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 TPH C28-C35	5100 982	78.7 78.7	mg/kg mg/kg	04/05/06 04/05/06	BNH 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

### Analytical Services Kwik!

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

### ASK LABORATORIES, INC.

Page 3

OΑ	/oc	INFORMATION	ľ

	LCS	MS	MSD	RPD	BLANK
MTBE	100%	107%	106%	0.4%	bdl
BENZENE	99%	95%	93%	1.6%	bdl
TOLUENE	96%	90%	91%	1.1%	bdl
ETHYLBENZENE	99%	95%	96%	1.0%	bdl
O-XYLENE	100%	93%	94%	0.8%	bdl
m, p-XYLENES	100%	97%	97%	0.0%	bdl
METHOD 8015	LCS	MS	MSD	RPD	BLANK
ТРН	95%	94%	92%	2.3%	bdl
COMPOUND	RPD	SPIKE F	RECOVERY	QC RECO	
CHLORIDE	0.9%	9	918	94%	bdl

bdl = 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

5935 Glenoak Lane TEST NAME : CHLORIDE ON SOLID Amarillo, Texas 79109 Telephone (806) 353-4425 Toll Free 1-800-423-9443 METHOD 300.0 : ION CHROMATOGRAPHY Facsimile (806) 352-6454 METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES,

METHOD 9056 ION CHROMATOGRAPHY

SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.

Please Note: Liability and Damages. ASK Laboratories, Inc. 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 analysis. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories, inc. within thirty days of the applicable service. In no event shall ASK Laboratories, inc. be liable for incidental or consequential damages, including those without limitation, business interruption, 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, inc. regardless of whether such claim is based upon any of the preceding stated reasons or otherwise.

### **ASK Laboratories**

Analytical Services Kwik!

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

## Chain of Custody Record

Work Order No.

Client Name White Bill Hallo Environmental
Rolling Operation SCB 23 #3-8

Project I.D./Location Rolling Operation Rolling SCB 23 #3-8

Rolling Operation Rolling Operation Rolling SCB 23 #3-8

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# CHAIN OF CUSTODY

# White Buffalo Environmental Services, Inc.

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

City, State, Zip.   Comp. Grab.   Sample Description   No. of Type of BTEX TRPH TCLP RCRA TDS   PAH CHLORIDES	Client (Name): Range.			Project (Name): SDUth Culebra Bluff 23 #3-B	Spu	th (	gapr	ra	Bluf	£ 23	#3-6
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### 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.).
  - O 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.

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

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

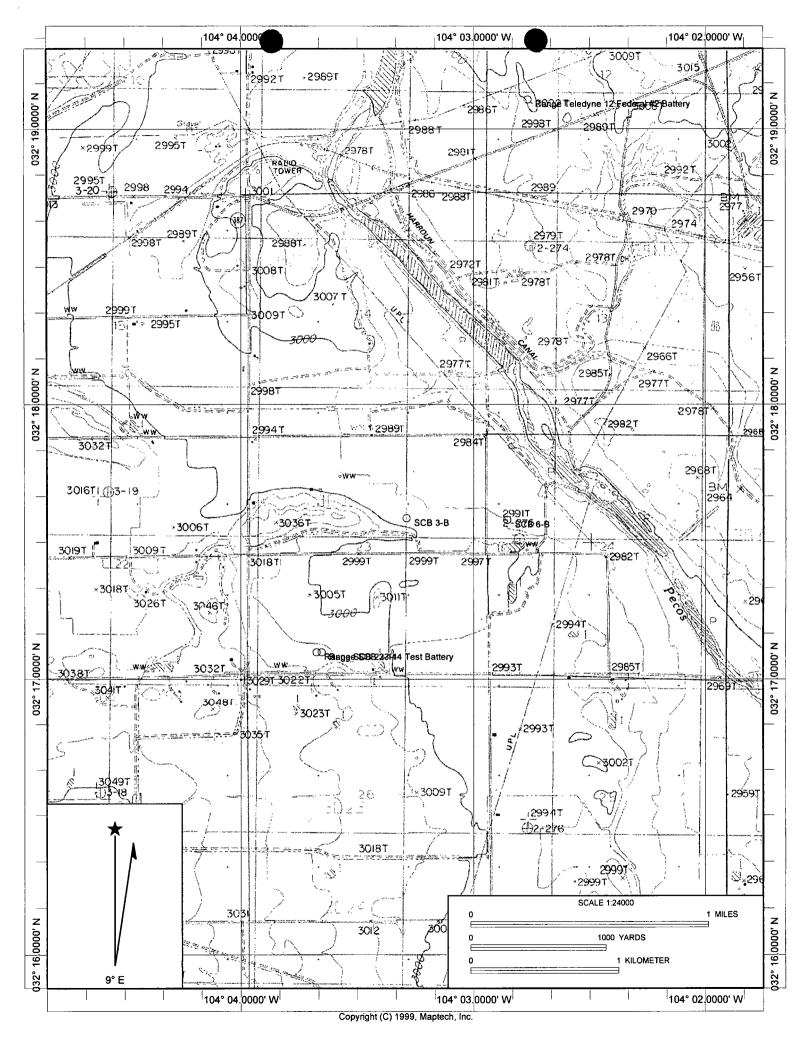
**Enclosures:** 

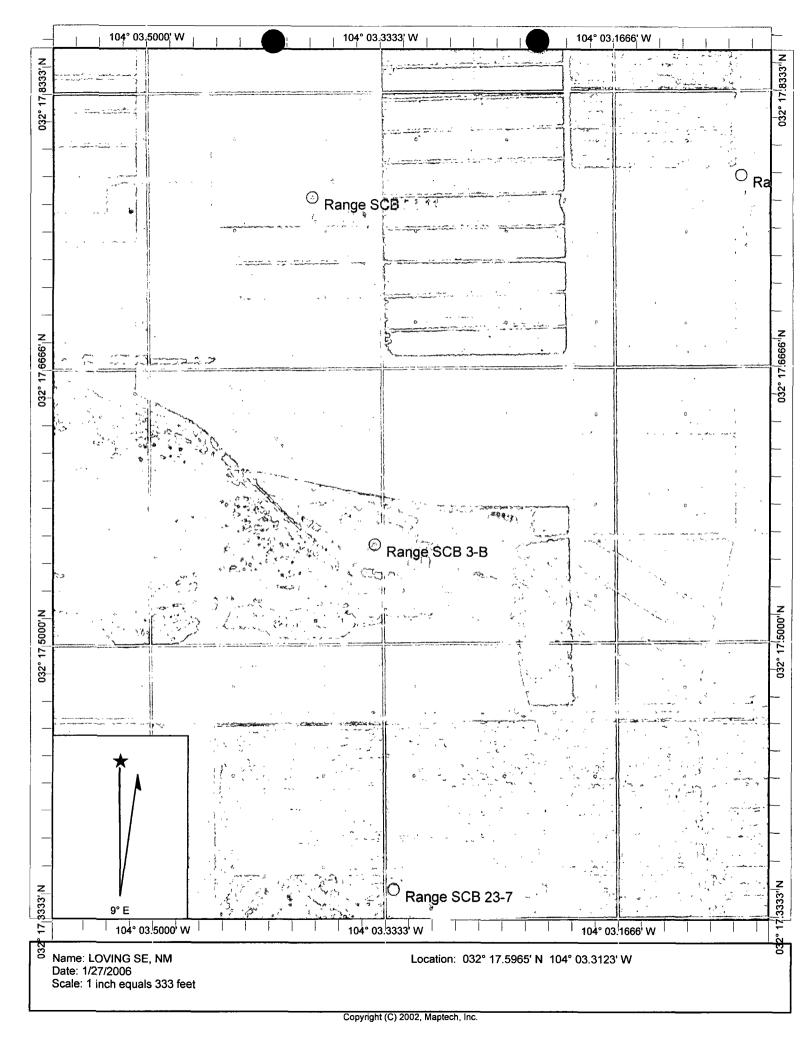
Information and Metrics sheet USGS Map Aerial Photo Site Photographs

### RANGE OPERATING NEW MEXICO, INC

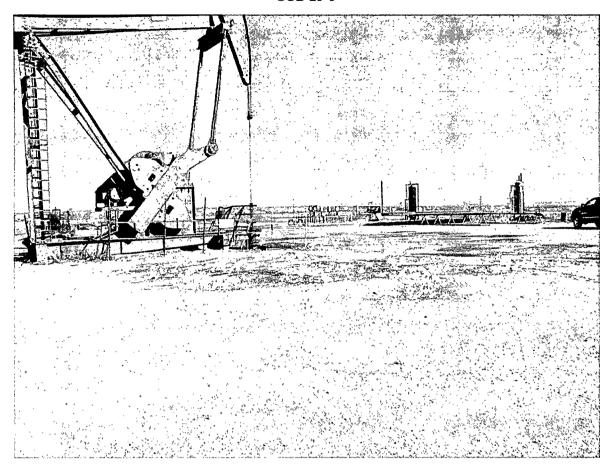
### **Information and Metrics**

Incident Date: January 11.	2006		NMOCD Notifie	d: January	11, 2006
Site: South Culebra Bluff U		3			iCLB0601142847
Company: Range Operation	g New Me	xico, Inc.			
Street Address: 777 Main					
Mailing Address: 777 Ma	in Street Su	ite 800			
City, State, Zip: Ft. Worth	, TX 76102	2			
Representative: George To	eer				
Representative Telephone	: (817) 870	0-2601			
Fluid volume released (bb			Recovered (bbls)		
25 bbls:			24 hrs and submit for		in 15 days.
			t releases >500 mcf N orm C-141 within 15 a		
Leak, Spill, or Pit (LSP) N			orm C-141 wunin 13 a	iays	
Source of contamination:			dumping waste or	1 ground	
Land Owner, i.e., BLM, S				181011111	
LSP Dimensions: 60' X 50					
LSP Area: All around well					
Location of Reference Poi		A			
Location distance and dire					<u> </u>
<b>Latitude:</b> N 32° 17.588'			•		
<b>Longitude:</b> W 104° 3.282'	<u> </u>				
Elevation above mean sea	level: 2999	o' per USGS Map			
		<del> </del>			
Location- Unit or 1/4 1/4: SE	/4 NW/4 o	f Sec. 23	Unit Letter: M	, ,	
<b>Location Section: 23</b>					
<b>Location- Township: 23S</b>					
Location Range: 28E	1.21				
***************************************					
Surface water body within				ар	
Domestic water wells with	in 1000' ra	dius of site: No	1734' per map		
Agricultural water wells w					
Depth from land surface t	o ground v	vater (DG): 60' e	stimated based up	on relation:	ship to Pecos River
Depth of contamination (I			·		
Depth to ground water (D	G - DC = 1				
1. Ground water		2. Wellhead P		_	nce to Surface Water Body
If Depth to GW <50 feet: 20 point		f <1000' from water from private domestic			contal feet: 20 points
If Depth to GW 50 to 99 feet: 10		points	water source. 20	200-100 ho	orizontal feet: 10 points
		f>1000' from water	source, or >200'		
If Depth to GW >100 feet: 0 poin		from private domestic	water source: 0	>1000 hori	izontal feet: 0 points
		ooints	A C	Coorfees W	-A C 0
Ground Water Score = 10 Site Rank (1+2+3) = 10		Wellhead Protection	Area Score = U	Surface W	ater Score = 0
SILC KAIIK (1+2+3) = 10	Total Sit	e Ranking Score and	d Acceptable Concen	trations	
Parameter	1000000	>19	10-19		0-9
Benzene		10 ppm	10 ppm		10 ppm
BTEX		50 ppm	50 ppm	,	50 ppm
TPH	<u> </u>	100 ppm	1,000 ppm	<u> </u>	5,000 ppm



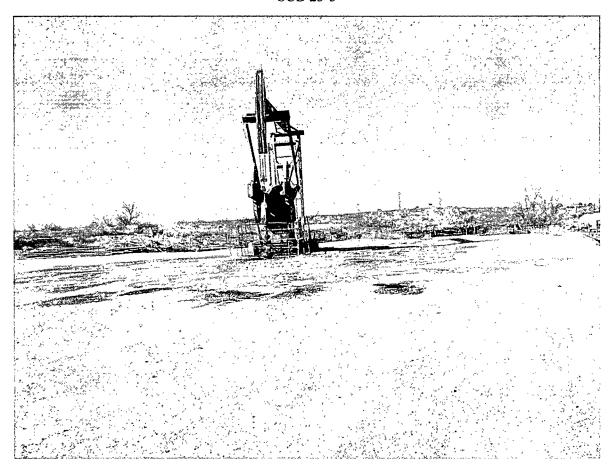


### Photographs 1/11/06 SCB 23-3



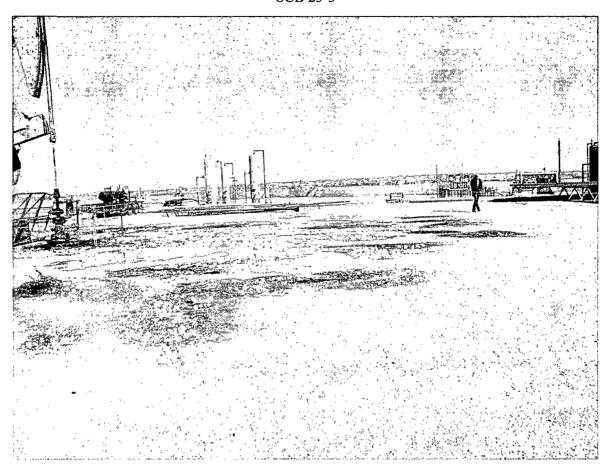
NW to SE view

### 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,

Greg Swindle, President WBESI

Enclosures:

Laboratory results Photographs

### **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

Sample	Sample Description	Sample Number	Sample Description	
Number		<del></del>	SCB 23 #3B S3	
	SCB 23 #3B S1 SCB 23 #3B S2	03	SCB 23 #3B S3	

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

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 PERCENT SOLIDS - DRY WT.	<u>Result</u> 94.84	SOL	<u>Units</u> wt % solids	<u>Analyzed</u> 04/17/06	<u>By</u> BJP
CHLORIDE ON SOLIDS	4390	100	mg/kg	04/18/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<33.5	33.5	mq/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 PERCENT SOLIDS - DRY WT.	<u>Result</u> 97.99	_SQL_	Units wt % solids	Analyzed By 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	04/17/065935 Bienoak Lane
ETHYLBENZENE	<0.018	0.018	mg/kg	
XYLENE	<0.018	0.018	mg/kg	04/17ēléphone 1(8008) 353-4425
Surrogates				Toll Free 1-800-423-9443
BROMOFLUOROBENZENE	102	Min: 80	Max:	120 Facsimile (806) 352-6454

Please Note: Liability and Damages, ASK Laboratories, Inc. 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 analysis. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories, Inc. within thirty days of the applicable service. In no event shall ASK Laboratories, Inc. be liable for includental or consequential damages, including those without limitation, business interruption 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, Inc. regardless of whether such claim is based upon any of the preceding stated reasons or otherwise.

### **Analytical Services Kwik!**

Order # 06-04-037

ASK LABORATORIES, INC.

Page 3

04/19/06 14:30

### TEST RESULTS BY SAMPLE

Sample: (	3A SCB	23 #3B	S3	Collected:	04/13/06	09:15
		"			,,	

		1			
Test Description	<u>Result</u>	SOL	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	97.84		wt % solids	04/17/06	BJP
CHI OPIDE ON GOLIDO	10000	100	mm /2	04/10/06	DATTI
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%	888	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	
						5935 Glenoak Lane
COMPOUND	RPD	SPIKE	RECOVERY	QC RECO	VERY BLAN	K Amarillo, Texas 79109
CHLORIDE	0.3%		91%	95%	bdl	Telephone (806) 353-4425
						Toll Free 1-800-423-9443
= below detectable	elevels					Facsimile (806) 352-6454

bdl = below detectable levels

### **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.

5935 Glenoak Lane Amarillo, Texas 79109 Telephone (806) 353-4425 Toli 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 Bustal a Environment of Project 1.D. Location Range Operation No.

Address < 435 1851-9054

Telephone 3351 1551-9054

Sampled By Royanie 70101

Please note: Liability and Damages. ASK Laboratories liability and clients exclusive remedy for any dalm arising wither 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 walved unless made in writing and received by ASK Laboratories within think days of the apprabale sorkice. In no event shall ASK Laboratories be liable for incidental or consequential damages, including without limitation, business interruptions, loss of ouse, or loss of profils incurred by the client, its subsidiaries, affiliates, or successors arising out of or related to the performance of services rendered by ASK Laboratories, regardiess of whether such datins is based upon any of the preceding stated reasons or otherwise.

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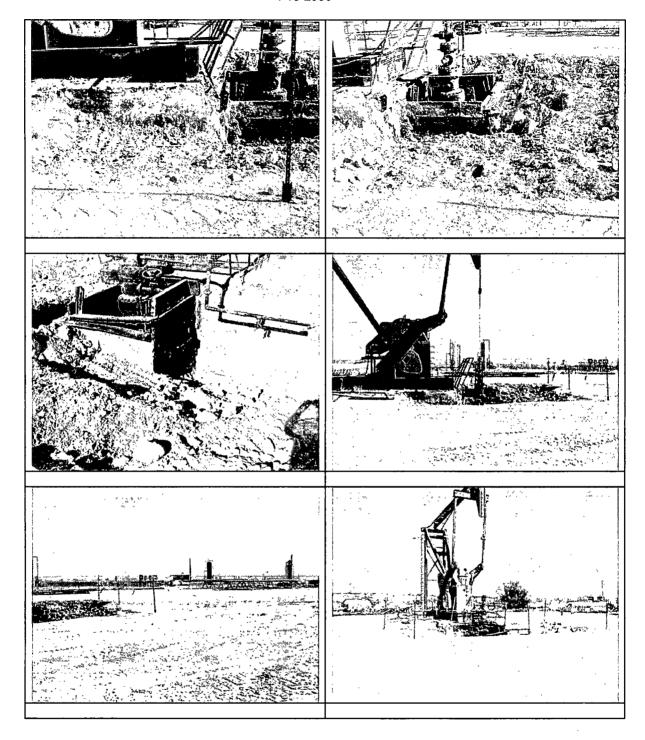
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### Login Checklist

Order # 060	403	7_						
Shipping Method:	k	<u>309</u>	<u> </u>	Date/T	ime o	f Rece	eipt:	4-14 0705
Cooler Check	_							
		Ice i	n Cooler	<del>,</del>		dy Sea		
Shipping Container			If No,	Pres		Intact?		Tracking Number
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Note: If the tempera	ature o	f a cc	oler/sample is	above	6°C f	ill out	NCR.	
Custody Seals on Bottles Present:  If Yes, is it intact?  If Not intact, fill out NCR								
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5935 Glenoak Lane Amarillo, TX 79109

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

### 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 1 2 2006
PERMATERIA

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,

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** 

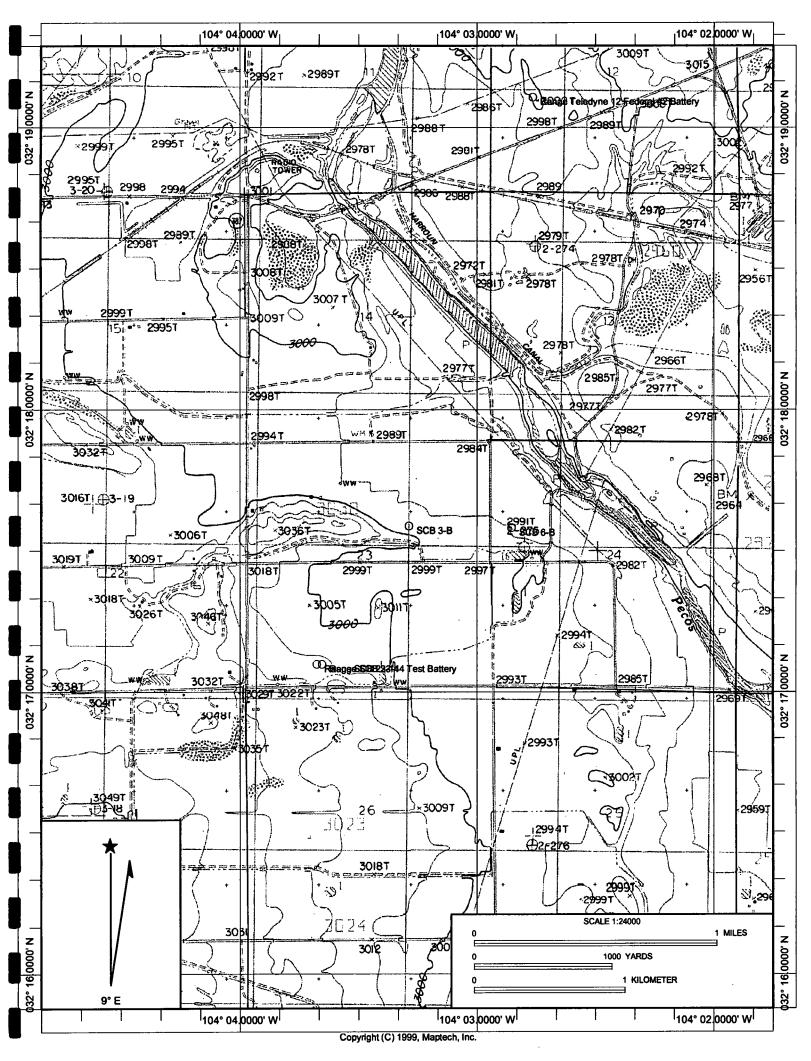
### **Enclosures:**

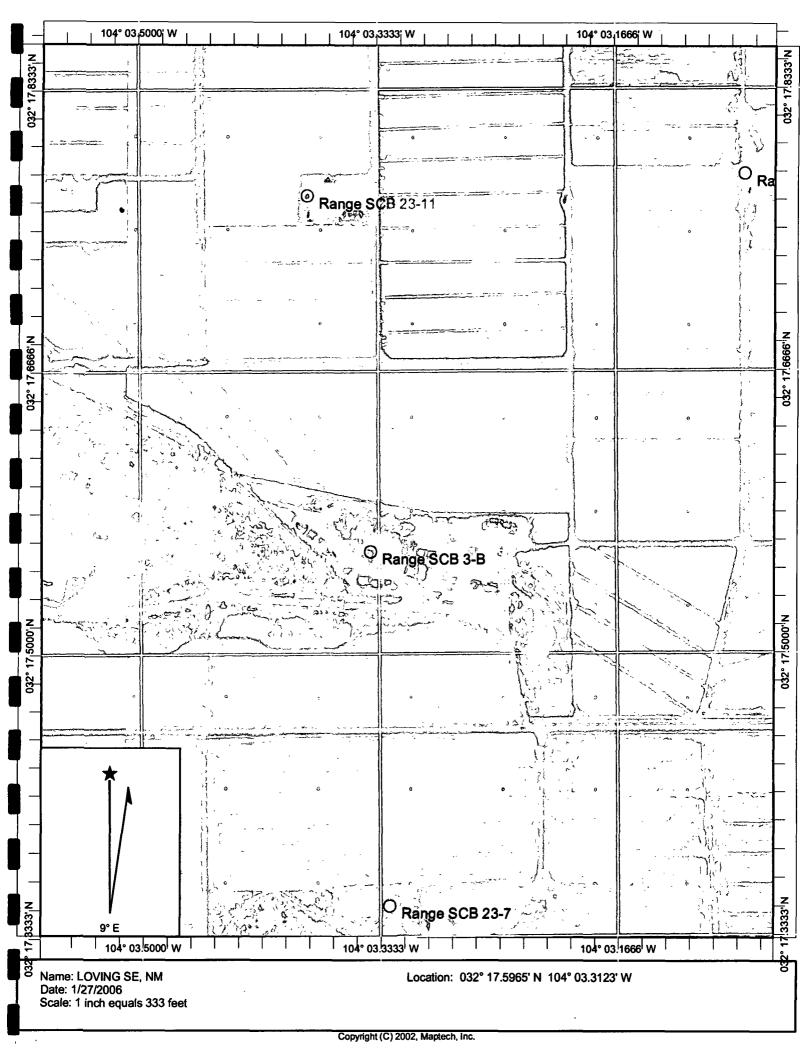
Information and Metrics sheet USGS Map Aerial Photo Site Photographs

### RANGE OPERATING NEW MEXICO, INC

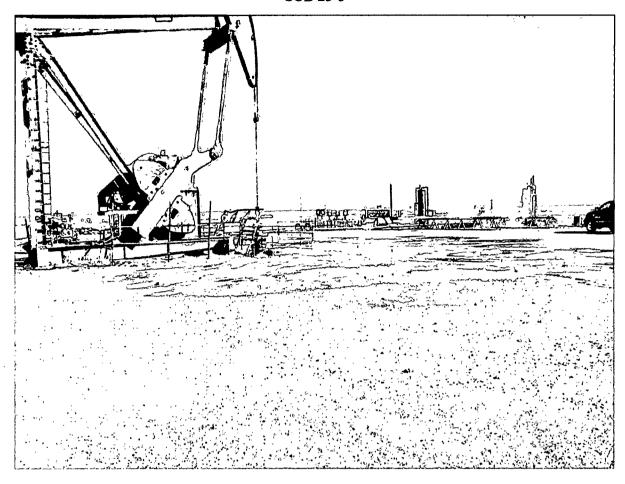
**Information and Metrics** 

		ion and Metrics	···	<del></del>
Incident Date: January 11		NMOCD Notifie		
Site: South Culebra Bluff	Unit No.003	Assigned Site Re	eference #: iC	CLB0601142847
Company: Range Operation	ng New Mexico, Inc.			
Street Address: 777 Main	Street Suite 800	· ·		
Mailing Address: 777 Ma	in Street Suite 800			
City, State, Zip: Ft. Worth		٠.		
Representative: George T				
Representative Telephone				
Fluid volume released (bb		Recovered (bbls	): 0	
25 bbls	Notify NMOCD verbally wit	hin 24 hrs and submit for	n C-141 within	15 days.
		rized releases >500 mcf N		
Table Carilland Did (I CD) N		nit form C-141 within 15 c	iays	
Leak, Spill, or Pit (LSP) N				
Source of contamination:			i grouna	·
LSP Dimensions: 60' X 50		. Kela		· · · ·
		<del></del>		
LSP Area: All around well		<del> </del>	·	<del></del>
Location of Reference Poi	<u> </u>			
Location distance and direction and direction distance and direction and	ection from RP: NA			
Latitude: N 32° 17.588'				· · ·
<b>Longitude:</b> W 104° 3.282'		······································		
Elevation above mean sea	level: 2999' per USGS N	Map		
	1/4 > 1777/4 CO 00	TT *1 T 11 3.5		
Location- Unit or ¼ ¼: SE	2/4 NW/4 of Sec. 23	Unit Letter: M		
Location Section: 23			•	
<b>Location- Township: 23S</b>				
Location Range: 28E				
	40001 11 6 11 37	7700076		
Surface water body within			ap	<del></del>
Domestic water wells with				
Agricultural water wells v				
Depth from land surface t		0' estimated based up	on relationshi	p to Pecos River
Depth of contamination (I	OC): 8'			· # ==
Depth to ground water (D			T = = :	
1. Ground water		d Protection Area	<u> </u>	to Surface Water Body
If Depth to GW <50 feet: 20 poir	from private dom	rater source, or <200' estic water source: 20		al feet: 20 points
If Depth to GW 50 to 99 feet: 10	points points	iestic water source. 20	200-100 horiz	ontal feet: 10 points
		rater source, or >200'		
If Depth to GW >100 feet: 0 poir		estic water source: 0	>1000 horizor	ntal feet: 0 points
	points			
Ground Water Score = 10	Wellhead Protect	ion Area Score = 0	Surface Water	r Score = U
Site Rank $(1+2+3) = 10$	Total Site Renking Soor	e and Acceptable Concen	trations	
Parameter	>19	10-19	aciviis	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



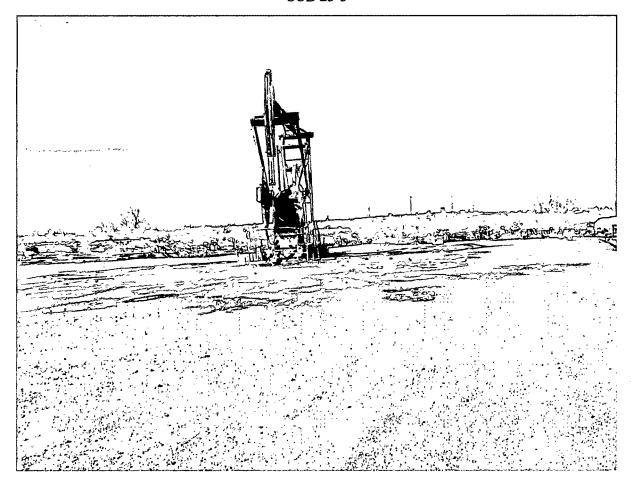


### Photographs 1/11/06 SCB 23-3



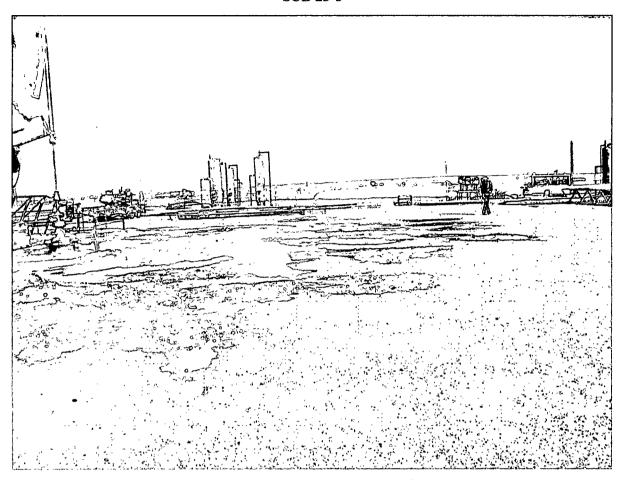
NW to SE view

### 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

### **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

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

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

Work ID: FLOOR COMPOSITE Date Received: 03/31/06

Date Completed: 04/06/06

Client Code: WHITE BUFF

SAMPLE IDENTIFICATION

Sample Sample Number Description

FLOOR COMPOSITE

Sample Number Sample

Certified By

ALAN D. KING

### **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	Co	llected: 03/2	9/06 09:20		
Test Description	<u>Result</u>	SQL	<u>Units</u>	Analyzed	By
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	

### **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%	bdl	
BENZENE	99%	95%	93%	1.6%	bdl	
TOLUENE	96%	90%	91%	1.1%	bdl	
ETHYLBENZENE	99%	95%	96%	1.0%	bdl	
o-xylene	100%	93%	94%	0.8%	bdl	
m,p-XYLENES	100%	97%	978	0.0%	bdl	
METHOD 8015	LCS	MS	MSD	RPD	E	BLANK
TPH	95%	94%	92%	2.39	\$	bdl
COMPOUND	RPD	SPIKE	RECOVERY	QC RECO	VERY	BLANK
CHLORIDE	0.9%		91%	94%		bdl

bdl = 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

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

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.

Please Note: Liability and Damáges. ASK Laboratories, Inc. Ilability 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 analysis. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories, inc. within thirty days of the applicable service. In no event shall ASK Laboratories, inc. be liable for incidental or consequential damages, including those without limitation, business interruption, 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, Inc. regardless of whether such claim is based upon any of the preceding stated reasons or otherwise.

### **ASK Laboratories**

Analytical Services Kwikl

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

Work Order No.

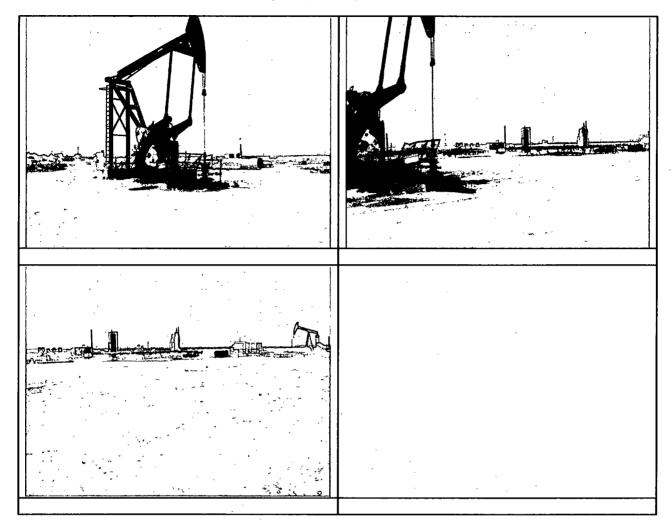
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TIMES.											
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No. of Containers		}									ğ
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						· Jugger					Remarks:  Headspace Property Sealed Chilled to 40° F Tamper Seal Type of Container Additional Comments:
Sample Description	Floor Composite	1				A Company of the Comp			<b>)</b>	·	106 8:00 A Received of Espains of Time Received by signature Received by signature of Time Office of Time Received by signature of Time Office of Time Offic
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Composite	×	•									3000
Matrix	108					Marine .	. ,			,	33000 Ser 100 grams)
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## CHAIN OF CUSTODY

# White Buffalo Environmental Services, Inc. 5425 Ben Ficklin Road San Angelo, Texas 76904 Phone: 325-651-9054 Fax: 325-651-2125

Client (Name): Range		Project (Name):	Sputh Cul	Project (Name): Spilth Cillebra Bliff 23 #3-B	- 23 # 3-B
Address:					
City, State, Zip:		Location: L()	Location: LOVING, NM		
Telephone:			, /		
Fax:					
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Relinguished By: (Time: Signature	Temp.	Received for Laboratory By: Signature	) \	Date: 1 ( Date: 1	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.

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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,

Greg Swindle, President WBESI

**Enclosures:** 

Laboratory results Photographs

### **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

Sample			Sar	mple								
Number		Description										
01	SCB	23	#3B	S1								
02	SCB	23	#3B	S2								

Sample Sample

Number Description

O3 SCB 23 #3B S3

Certified E

ALAN D. KING

**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 PERCENT SOLIDS - DRY WT.	<u>Result</u> 94.84	SQL	<u>Units</u> wt % solids	<u>Analyzed</u> 04/17/06	<u>By</u> 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 PERCENT SOLIDS - DRY WT.	Result 97.99	SOL	<u>Units</u> wt % solids	Analyzed By 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	04/17/06593 <del>KBI</del> Inoak Lane
ETHYLBENZENE	<0.018	0.018	mg/kg	04/17/Amarilis Prexas 79109
XYLENE	<0.018	0.018	mg/kg	04/ITeléphone I(806) 353-4425
Surrogates				Toll Free 1-800-423-9443
BROMOFLUOROBENZENE	102	Min: 80	Max:	120 Facsimile (806) 352-6454

### **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	<u>Result</u>	SQL	<u>Units</u>	Analyzed	<u>By</u>
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					
· · · · · · · · · · · · · · · · · · ·		0.000	/1	04/27/06	***
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	BLANE	ζ		
	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%	888	888	0.8%	bdl			
	m,p-XYLENES	89%	91%	90%	1.2%	bdl			
М	ETHOD 8015	LCS	MS	MSD	RPD		BLANK	·	
	TPH	98%	79%	76%	1.8%		bdl		
					•			5935 Glenoak Lan	е
	COMPOUND	RPD	SPIKE 1	RECOVERY	QC RECO	VERY	BLANK	Amarillo, Texas 7910	9
	CHLORIDE	0.3%	:	91%	95%		bdl	Telephone (806) 353-442 Toll Free 1-800-423-944	
bdl =	below detectable	levels						Facsimile (806) 352-645	4

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

### **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.

### **ASK Laboratories**

Analytical Services Kwikl

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

## Chain of Custody Record

Work Order No.

Client Name White Busto Project I.D. Location Revale Conditions State Conditions State Conditions Sale Conditi

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exclusive remedy for any dalm arising whither 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 walved unless made in writing and received by ASK Laboratories within thiny 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 a faiting out of or related to the performance of services rendered by ASK Laboratories, regardless of whether such dalms is based upon any of the preceding stated resoons or otherwise.

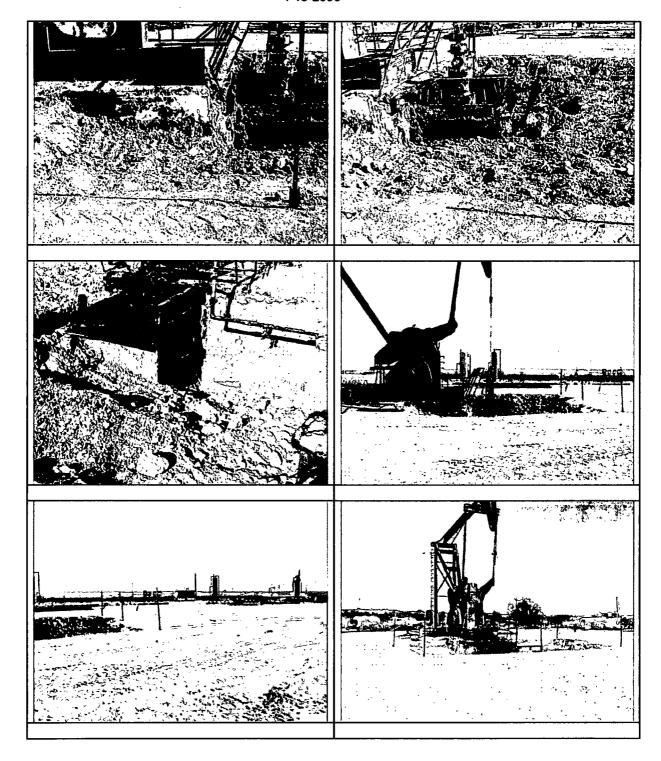
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	əjsQ	4-13-06 915E										Relipquished by: (Signature)	ned by, Signates	Relinquished by: (Signature)	Client Agrees to:	Accept Returned Sample	Pay for sample Disposal (\$30 per 100 grams)	Client's Signature _
	# əldwes	01	02	03	04	05	90	07	80	60	10	Relipquis	Refinquished by	Relinquist	Client A	Acce	Pay	Clie

### Login Checklist

Order #	403	7_						
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Cooler Check								
		Ice i	n Cooler		Custo	dy Sea	al	
Shipping Container			If No,	Pres	ent?	Int	act?	Tracking Number
	Yes	No	Temperature	Yes	No	Yes	No	
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Note: If the tempera	iture o	tacc	oler/sample is	above	6°C 1	ш out	NCR.	
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Chain of Custody I				es(		No_		
If Yes, verify receipt								
and Date COC and fi	ll out	labora	atory boxes. D	ocume	nt an	y disci	repanci	es on NCR.
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Acid Preserved San				es	<del>-</del>	No_	\t/	
II NO,	fill ou	II NC	K.				1	4
Base Preserved San	mles	nH>/	/=12 V	es		No		folid
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Coolers Unpacked/	Check	ed by	. XIX				Dat	e: 4 -19
NCRs (y/n):/	-			hayeT	Cont	irm of	tion (y.	/n\•
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5935 Glenoak Lane Amarillo, TX 79109

Site Photographs SCB 23-3 4-13-2006



### **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

Sample		Sa	ample	Sample		s	ample
<u>Number</u>		Desc	cription	Number		Des	cription
01	SCB	23-3	S1	03	SCB	23-3	S3
02	SCB	23-3	S2				

Certified By

Alan D. King

### **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

Test Description PERCENT SOLIDS DRY WEIGHT	Result 99.25	SOL	Units wt % solids	<u>Analyzed</u> 05/24/06	By 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

Test Description	Result	SOL	<u>Units</u>	Analyzed By
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	05/25/06593 <b>5 Dile</b> noak Lane
TOLUENE	<0.015	0.015	mg/kg	05/25/Amaril KDD (bxas 79109
ETHYLBENZENE	<0.015	0.015	mg/kg	05/2059/e/phone KBEOS) 353-4425
XYLENE	<0.015	0.015	mg/kg	05/25010Ree 1000-423-9443
Surrogates			•	Facsimile (806) 352-6454
BROMOFLUOROBENZENE	95	Min: 80	Max:	120

### **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

Test Description PERCENT SOLIDS DRY WEIGHT	Result 98.11	SOL	<u>Units</u> wt % solids	<u>Analyzed</u> 05/24/06	<u>By</u> 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	

### **Analytical Services Kwik!**

Order # 06-05-091 05/30/06 13:15 ASK LABORATORIES, INC.

Page 4

OA/	OC.	INFORMATION
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	LCS '	MS	MSD	RPD	BLANK
BENZENE	103%	103%	109%	5.0%	bdl
TOLUENE	95%	90%	98%	7.4%	bdl
ETHYLBENZENE	101%	104%	113%	8.1%	bdl
m,p-XYLENES	103%	103%	114%	9.8%	bdl
O-XYLENE	99%	103%	116%	11.8%	bdl
TX1005	-LCS	MS	MSD	RPD	BLANK
TPH	106%	93%	84%	9.3%	bdl
COMPOUND	RPD	SPIKE	RECOVERY	QC RECO	VERY BLANK
CHLORIDE	0.2%		91%	93%	bdl

bdl=below detectable levels

### **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.

### **ASK Laboratories**

Analytical Services Kwikl

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 1.D. Location Range

Address 5425 Ben Ficklin Rd. San Arigelo Telephone (325) 651 9054

Sampled By Ronnie Taylor

Please note: Lability and Damages. ASK Laboratories liability and clients exclusive remedy for any claim arising whither 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 walved unless made in writing and received by ASK Laboratories within think days of the spelicable service. In no event shall ASK Laboratories be liable for incidential or consequential damages, including without limitation, business interruptions, loss of use, or loss of producing without limitation, business interruptions, loss of use, or loss of producing without limitation, the performance of services rendered by ASK Laboratories, regardless of whether such claims is based upon any of the preceding stated reasons or otherwise.

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	No. of Containers	XX	× -	X X								Yes		>	×	×	) ] ]	0	ments:	
												Remarks:	Headspace	Properly Sealed	Chilled to 40° F	Tamper Seal	Type of Container		Additional Comments:	
1	Sample Description	SCB 23-3 51	CB 23-3 52	SCB23-3 573			The state of the s	* ar				COO Received to Lightness ref	Received Di: (signature)	Received by: (signature)	A. A	)				
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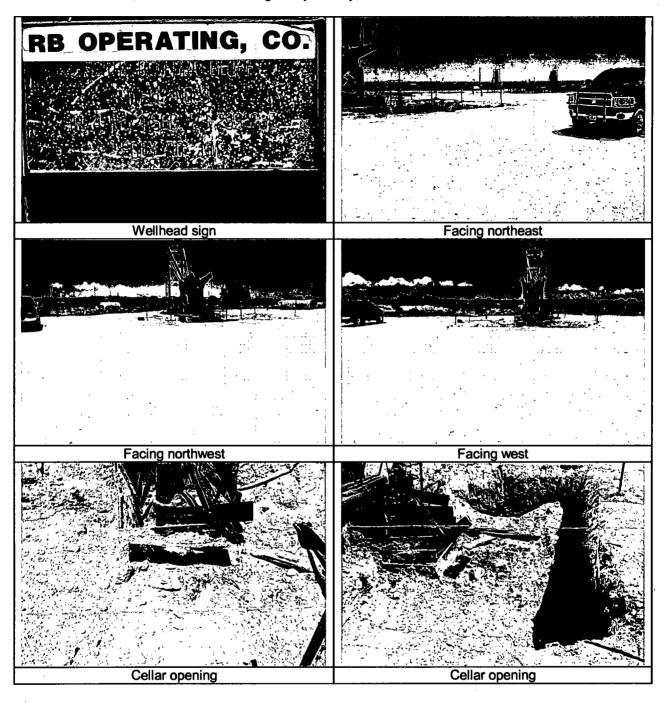
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Chain of Custody In If Yes, verify receipt and Date COC and find Acid Preserved Samuel If No.	nclude of all out l	ed: contai abora pH<	Yesiners listed and atory boxes. Do	ocume	uired nt any	No_ fields v discr	are co	mplete. Sign es on NCR.
Base Preserved Sam If No,	-	_		es	_	No_	<del></del>	· · · · · · · · · · · · · · · · · · ·
Coolers Unpacked/C	Check	ed by	5. Kin	8		-	Date	e: 5-24-06
NCRs (y/n):			F	axed	Conf	irmati	ion (y/	n):

5935 Glenoak Lane Amarilio, TX 79109

PLEASE PRINT USE BALL ROINT PEN! RESS HARD TYPE OF COM COLLEGIE PICK-UP TEN TOTAL DELIVERY STOPAGE

### 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



P.O. Box 388 • Hobbs, New Mexico 88241-0388 (505) 393-1079 www.crihobbs.com

Company/Generator Range  Lease Name 5 C B 2 3  Trucking Company C N Vehicle Number Driver (Print) Ray	Bill to			·				
Lease Name 5 c B = 3  Trucking Company C V Vehicle Number Driver (Print)  Date 3 - 2 9 - 0 6 Time 5 5 0 (a.m.)  Type of Material    Exempt   Tank Bottoms   Fluids   Fluids   Clist Description Below      DESCRIPTION	Address							
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Type of Material    Exempt	Trucking Company		V				Print) Ray	<b></b>
Type of Material    Exempt	Date 3-29-	06	· · · · · · · · · · · · · · · · · · ·		Time $\mathscr{F}$ .	50		a.m.)p.m.
Non-Exempt   C117   Other Material     C138		•		Type of M	/laterial			
C138   Soils	☐ Exempt		☐ Tank B	ottoms		☐ Fluids		• •
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□ 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	·					10		····
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     Conservation   C	Volume of Material	☐ Bbls	<del></del>		Yard	he _	Gallons	
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	☐ Wash Out	□ Call Out		(	☐ After Hour	S	☐ Debris (	Charge
TANK BOTTOMS  Feet Inches  1st Gauge BBLS Received BS&W  2nd Gauge Free Water	I represent and warran Conservation and Rec Agent	nt that the wastes	are: generated f	from oil and gas atlons; and not r	exploration armixed with no	nd production op n-exempt waste	perations: exempt from the state of the stat	om Resource
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1st Gauge BBLS Received BS&W 2nd Gauge Free Water	CRI Representative		Mare					
1st Gauge BBLS Received BS&W 2nd Gauge Free Water	TANK BOTTOMS		~~~~					•
2nd Gauge Free Water	٦ ٢	<u>reet</u>		<del>                                     </del>	DDI C Dara		D0044	
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Received Total Received	2nd Gauge				Free W	/ater		
	Received				Total Rece	ived		

P.O. Box 388 • Hobbs, New Mexico 88241-0388 (505) 393-1079 www.crihobbs.com

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CRI Representative _	/ , No	Chee				
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CRI Representative	7. W	Vone				
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P.O. Box 388 • Hobbs, New Mexico 88241-0388 (505) 393-1079 www.crihobbs.com

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Company/Generator	ScB &	3-8-3	<del>/</del>			<del></del>	
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Bill to	
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### Bratcher, Mike, EMNRD

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 in 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