ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

April 18, 2002

Phone (505) 327-4961 Fax (505) 327-4962

Mr. Nathan Crawford Key Energy Services P.O. Box 900 Farmington, New Mexico 87499-0900

Client No. 98065-005

RE: CLOSURE DOCUMENTATION FOR REMOVAL OF ASBESTOS CONTAINING MATERIAL FROM FANNIE WARD #1 WELL, 18-30N-11W, AZTEC, NEW MEXICO

Dear Mr. Crawford:

This is to confirm that Envirotech has completed the removal of Asbestos Containing Material (ACM) from Fannie Ward #1 Well, 18-30N-11W, Aztec, New Mexico.

Enclosed, please find the following closure documentation:

- 1) Proposal letter, dated May 25, 2001
- 2) Envirotech Work Order
- 3) Asbestos Analysis Letter to Denny Foutz, Oil Conservation Division, dated March 25, 2002
- 4) Analytical Results
- 5) Envirotech Tailgate Safety Meeting Sheet
- 6) Asbestos Worksheet
- 7) Asbestos Sign In & Out Sheet
- 8) Waste Manifest #001330 Keer's, USEPA Certified Monofill

These close out documents are very important and are required to be kept in your records for no less than thirty (30) years per USEPA Regulations.

We appreciate having been of service to you. Please contact us for any future needs.

Respectfully Submitted,

ENVIROTECH INC.

Judith Aillet

Administrative Assistant

Enclosures

Cc:

Denny Foutz, Oil Conservation Division

File No. 98065

JA:/Client-ACM/98065/041802/Closure Letter.doc



May 25, 2001

Phone (505) 327-4961 Fax (505) 327-4962

Mr. Nathan Crawford Key Energy Services P.O. Box 900 Farmington, NM 87499-0900

RE: SURFACE CLEAN UP AND PIT CLOSURE OF THE FANNIE WARD #1 WELL, 18-30N-11W, AZTEC, NEW MEXICO

Dear Mr. Crawford:

Envirotech proposes to remove all surface equipment including tank, separator units, miscellaneous piping and fencing for the P & A of the Fannie Ward No. 1 well. Work also includes excavation of two (2) pits and on-site landfarming, environmental sampling (2) BTEX and (2) TPH laboratory analysis.

The price for the work is \$4550.00

If additional work is required and more than 20 cubic yards is removed for on-site remediation, the following rates will apply:

Backhoe with operator \$59.50/hr
Environmental Scientist \$59.50/hr
Support Pickup \$15.00/hr
TPH Analysis \$80.00 each
BTEX Analysis \$80.00 each

Terms of payment are net 30 days with 1.5% monthly interest on all outstanding balances. To accept this proposal, please provide a purchase order or sign as indicated and return a copy via fax to our office.

Sincerely, ENVIROTECH INC.	Acceptance:	
Mories D. Young by	Signature	
Morris D. Young President	Title	Date

MDY:\Ilm\ltrs\052501 Nathan Crawford.doc

Envirotech Inc. **WORK ORDER**

Job Location:

Fannie Ward

Aztec, New Mexico

Mike Consel

Contact:

Randy Blackman (o)327-4961 (c)320-7653

or Joe Herrera - Key Energy Kerth 327-4935 Dishatet

Job Number:

98065-007

Job Description:

Location Cleanup, tank demo, Tree limb removal (?), Brush

Removal (?)

Equipment and Manpower: As needed

Key Energy will finish plugging and abandoning wells in the Aneth area within the next ten days. Key needs Envirotech to remove equipment and complete cleanup of the location at the Fannie Ward before they can move on the location.

I have not seen the location and did not bid the job so I don't know what needs to be done.

We need to coordinate with Key and the OCD to complete this work.

I told Randy that it is our understanding that any mess they make on location related to plugging after we have done the environmental cleanup will be Key's responsibility to cleanup. (Make sure we get the OCD's blessing on our work before Key moves onto

1240 - 0304 Meet Lordy Hold OFF centil Fulther Potace Possible West As

Ordered By: Harlan M. Brown March 1, 2002 Date:

7:50 am



March 25, 2002

Phone (505) 334-6178 Fax (505) 334-6170

Mr. Denny Foutz Oil Conservation Division of New Mexico 1000 Rio Brazos Road Aztec, New Mexico 87410

Client No. 98065-005

RE: ASBESTOS ANALYSIS OF INSULATION AT KEY ENERGY, FANNIE WARD #1 WELL SITE

Dear Mr. Foutz:

On March 20, 2002 Morris D. Young, certified Asbestos Inspector, Certificate No. 052501-22 sampled the insulation on the dehydrator vessel from the Fannie Ward #1Well. The sample was sent under Chain of Custody Record No. 09864 to EMC Laboratories, Scottsdale, Arizona. EMC is a NVLAP accredited Asbestos Analytical Laboratory, Accreditation No. 1926.

As per the attached results, the sample contains asbestos. The off white insulation contains 75% Chrysotile asbestos. Anything over 1% asbestos is OSHA and USEPA regulated material and must be handled by certified asbestos workers and disposed of at a facility permitted by the USEPA to handle asbestos.

We appreciate the opportunity to have been of service. If we can be of further assistance, please call our office at (505) 632-0615.

Sincerely,

ENVIROTECH INC.

Morris D. Young
Asbestos Inspector

Certification No. 052501-22

Enclosure

MDY:/jaa/98065/032502/D. Foutz.doc

Page 5 of 5

CHAIN OF CUSTODY

EMC Laboratories 7342 E. Thomas Road Scottedale, Arizona 85251 (800)362-3373 F.(480)890-8468

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Rec'd:	MAR 21 AM

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	Farmington, NM 8	7401			ort to: (So	2) (32	-1865				
ONTACT:											
hone / Fex	(800) 362-1879 / (505) 832-1885									
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INSULATION

3/22/02

ENVIRONMENTAL MANAGEMENT CONSULTANTS BULK MATERIAL REPORT

Page 1 of 1

82646 LAB:

REPORT Laboratory Analysis: BULK MATERIAL Methodology: EPA 600/M4-82-020

Client: ENVIROTECH P/O#: E3384

Reported to: DENNIS AIEMAN Prof: 98065-005 Sampled from: KEY ENERGY By: Client

Shipped vla: **FEDERAL EXPRESS** Received: 3/21/02 Reported: 3/22/02

IDENTIFICATION PARAMETER **TEST RESULTS** SAMPLE

01 22338 **Asbestos** Positive. This sample contains approx.

75% Chrysotlle, 3% Amosite, 2% Cellulose, 20% CaCO , CaSO , Mica , Binder insulation

off white

THE REPORT APPLIES TO THE STANDARDS OR PROCEDURES IDENTIFIED AND TO THE SAMPLE(S) TESTED. THE TEST RESULTS ARE NOT NECESSARILY INDICATIVE OR REPRESENTATIVE OF THE QUALITIES OF THE LOT FROM WHICH THE SAMPLE WAS TAKEN OR OF APPARENTLY IDENTICAL OR SIMILAR PRODUCTS, NOR DO THEY REFRESENT AN ONGOING QUALITY ASBURANCE PROGRAM UNLESS SO NOTED. THOSE REPORTS ARE FOR THE EXCLUSIVE USE OF THE ADDRESSED CLIENT AND ARE RENDERED UPON THE CONDITION THAT THEY WILL NOT BE REPRODUCED WHOLLY OR IN PART FOR ADVERTISING OR DITHER PURPOSES OVER OUR SIGNATURE OR IN CONNECTION WITH OUR NAME WITHOUT SPECIAL WRITTEN PERMISSION, BAMPLES NOT DESTROYED IN TESTING ARE RETAINED A MAXIMUM OF THIRTY DAYS.

ACCREDITED BY THE NATIONAL INSTITUTE OF STANDARDS. TECHNOLOGY, VOLUNTARY LABORATORY ACCREDITATION PROGRAM FOR SELECTED TEST METHOD FOR ASSESTOS. THE accreditation or any reports generated by this laboratory in no way constitutes or implies product certification, approval, or endorsement by the national institute of Standards and Technology, all analyses are derived from Calibrated Visual Estimate Unless Otherwise Noted. Polarized-light is not CONGIGITENTLY RELIABLE IN DETECTING ASBESTOS IN FLOOR COVERINGS AND SIMILAR NON-FRIABLE ORGANICALLY BOUND MATERIALS. QUANTITATIVE TRANSMISSION ELECTRON MICROSCOPY IS CURRENTLY THE ONLY METHOD THAT CAN BE USED TO DETERMINE IF THIS MATERIAL CAN BE CONSIDERED OR TREATED AS NON-ASBESTOS-CONTAINING.

Analyst: Paul D. Hofer

NVLAP Accreditation #1926, CA ELAP #1913, TX DOH #30-0094 7342 EAST THOMAS ROAD SCOTTSDALE, ARIZONA 85251-7216 (480) 990-2069 FAX: (480) 990-8468

CHAIN OF CUSTODY RECORD

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Project Location		Lab Number	A2338	,					-							
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