MISC.

CORRESPONDENCE

Price, Wayne

From: Price, Wayne
Sent: Friday, March 07, 2003 3:46 PM
To: Mike Griffin (E-mail)
Subject: Skelly-Penrose OCD Case # 1R026

To: Prize Energy in care of Whole Earth
3500 William D. Tate
Suite 200
Grapevine, Tx 76051

OCD is in receipt of the final monitor well P&A report and hereby approves of the final closure of this site.

Please be advised that NMOCD approval of this plan does not relieve Prize Energy of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Prize Energy of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

Sincerely:

Wayne Price
New Mexico Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505
505-476-3487
fax: 505-476-3462
E-mail: WPRICE@state.nm.us

ATKINS ENGINEERING ASSOCIATES INC.

1R026

July 10, 2002

Mr. Wayne Price
Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505

Dear Mr. Price:

Pursuant to our phone conversation, I am enclosing the plugging report, along with the Boring Logs.

This is all we have, on the two monitor wells, MW-2 and MW-3. We cannot find a log for MW-1 and may not have drilled MW-1.

If we can be of any further assistance, please do not hesitate to call.

Sincerely,

/Beverly McKinney

Beverly McKinney

Enclosures
Xc: Mike Griffin

(505) 624-2420
FAX: (505) 624-2421
caea@dfn.com

2904 West Second Street
Post Office Box 3156
Roswell, New Mexico 88202-3156

ATKINS ENGINEERING ASSOCIATES INC.

April 16, 2002

Randy Ray
3300 N. A Street
Building 8, Suite 120
Midland, Texas 79705

RE: Apache Skelly Penrose well plugging

Dear Mr. Ray:

On April 15, 2002, Atkins Engineering Associates, Inc. plugged 3 monitor wells on the old Apache Skelly Penrose location southeast of Eunice, New Mexico.

The 2 inch casings had previously been grouted in place, therefore no removal of casing was possible without collapse of the holes.

The work was accomplished on all 3 wells as follows:

1. Each monitor well total depth was measured as below:
   North Monitor Well – 62 feet
   South Monitor Well – 66 feet
   East Monitor Well – 61.5 feet

2. A cement slurry of 15 lbs./gal. was pumped down each hole to flow through the screen and plug the screen and casing.

3. Well heads were removed to below land surface.

4. Cement grout was applied to each well head to fill to land surface.

Sincerely,

Jackie D. Atkins, PE, PS, ES

xc: Mike Griffin, Whole Earth Environmental

(505) 624-2420
FAX: (505) 624-2421
caea@dfn.com

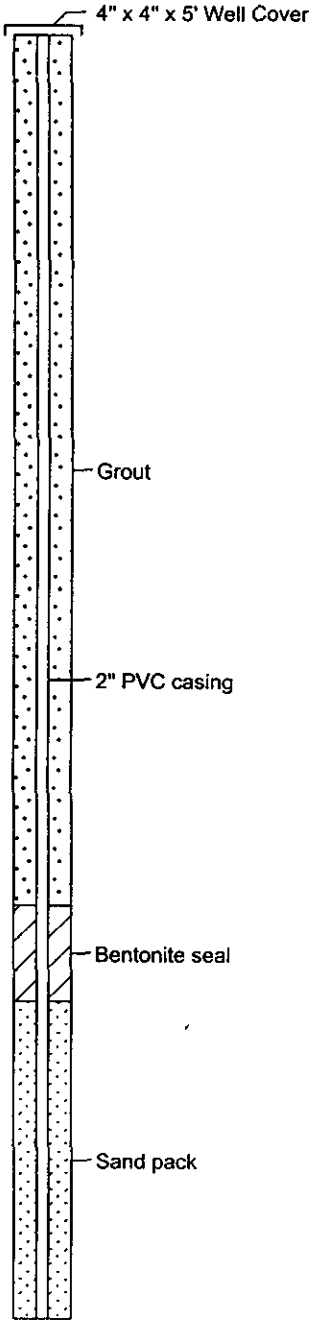
2904 West Second Street
Post Office Box 3156
Roswell, New Mexico 88202-3156

Atkins Engineering Associates, Inc. 2904 W. 2nd St., Roswell, NM 88202-3156	LOG OF BORING Apache Corp. MW-2 (Page 1 of 2)

Whole Earth Environmental 19606 San Gabriel Houston, TX 77084 Contact: Mike Griffin Job#: WHOLETH.MWD.01	Date : 02-21-01 Drill Start/Drill End : 0930/1145 Boring Location : 230'E of tank batteries, : E. Fence	Site Location : Lea Co. Well #64 : Sec.3, T23S, R37E Auger Type : Hollow stem Logged By : Mort Bates	

Depth in Feet	GRAPHIC	USCS	Samples	DESCRIPTION	Lab	PID ppm-v
0		SM		Sand w/ caliche, tan, loose, dry		
5						
				Caliche w/ sand, tan, loose, dry		
10						
				Sand w/ caliche, tan, loose, dry		
15						
20		SM				
25						
30				Caliche, tan, firm, dry		
				Sand w/ caliche, tan, loose, dry		
35		SM				
		SS		Sandstone, light tan, firm, dry		
40						

Well: MW-2



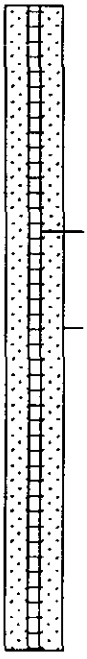
02-23-2001 C:\MTECH46\EARTH\mw-2.bor

Atkins Engineering Associates, Inc. 2904 W. 2nd St., Roswell, NM 88202-3156	LOG OF BORING Apache Corp. MW-2 (Page 2 of 2)

Whole Earth Environmental 19606 San Gabriel Houston, TX 77084	Date	: 02-21-01	Site Location : Lea Co. Well #64
	Drill Start/Drill End	: 0930/1145	: Sec.3, T23S, R37E
Contact: Mike Griffin	Boring Location	: 230'E of tank batteries, : E. Fence	Auger Type : Hollow stem
Job#: WHOLETH.MWD.01			Logged By : Mort Bates

Depth in Feet	GRAPHIC	USCS	Samples	DESCRIPTION	Lab	PID ppm-v
40						
		SS		Sandstone, light tan, firm, dry		
45						
		CL		Sandy clay, red, soft, moist		
50						
		CL		Clay, red, stiff, damp		
55						
		SS		Sandstone, light tan, firm, dry		
60				Total depth 60'		
65						
70						
75						
80						

Well: MW-2

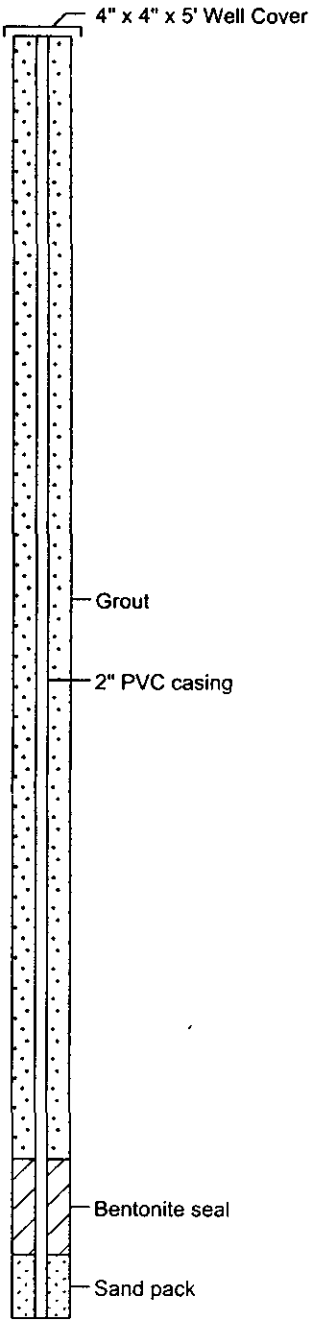


02-23-2001 C:\MTECH46\EARTH\mw-2.bor

Atkins Engineering Associates, Inc. 2904 W. 2nd St., Roswell, NM 88202-3156	LOG OF BORING Apache Corp. MW-3 (Page 1 of 2)

Whole Earth Environmental 19606 San Gabriel Houston, TX 77084 Contact: Mike Griffin Job#: WHOLETH.MWD.01	Date	: 02-21-01	Site Location : Lea Co. Well #64
	Drill Start/Drill End	: 1200/1530	: Sec.3, T23S, R37E
	Boring Location	: 92'S of tank batteries, : S. Fence	Auger Type : Hollow stem
			Logged By : Mort Bates

Depth in Feet	GRAPHIC	USCS	Samples	DESCRIPTION	Lab	PID ppm-v
0		SP		Sand, tan, loose, dry		
5		SM		Sand w/ caliche, tan, loose, dry		
10						
15		SP		Sand, tan, loose, dry		
20						
25				Caliche w/ sand, tan, loose, dry		
30		SP		Sand, tan, loose, dry		
35		SS		Sandstone, light tan, firm, dry		
40						

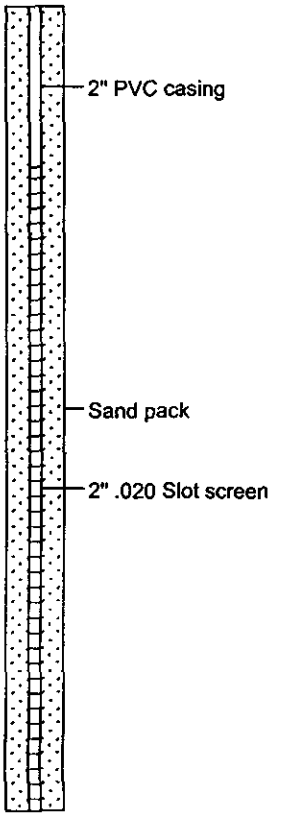


02-23-2001 C:\MTECH46\EARTH\mw-3.bor

Atkins Engineering Associates, Inc. 2904 W. 2nd St., Roswell, NM 88202-3156	LOG OF BORING Apache Corp. MW-3 (Page 2 of 2)
Whole Earth Environmental 19606 San Gabriel Houston, TX 77084 Contact: Mike Griffin Job#: WHOLETH.MWD.01	Date : 02-21-01 Drill Start/Drill End : 1200/1530 Boring Location : 92'S of tank batteries, : S. Fence Site Location : Lea Co. Well #64 : Sec.3, T23S, R37E Auger Type : Hollow stem Logged By : Mort Bates

Depth in Feet	GRAPHIC	USCS	Samples	DESCRIPTION	Lab	PID ppm-v
40		SS		Sandstone, light tan, firm dry		
45		SP		Sand, tan, loose, damp		
50		SC		Clayey sand, red, soft, moist		
55		CL		Sandy clay, red, soft, damp		
60		CL		Clay, red, stiff, damp		
65				Total depth 65'		
70						
75						
80						

Well: MW-3



02-23-2001 C:\MTECH46\EART\hmw-3.bor

Price, Wayne

From: Mike Griffin [whearth@iamerica.net]
Sent: Tuesday, March 05, 2002 12:06 PM
To: Price, Wayne
Subject: RE: Skelly-Penrose Monitor Well Closure

O.K., then try:

Prize Energy
3500 William D. Tate
Suite 200
Grapevine, Tx. 76051

Mort called back late yesterday and advised that his dance card is full through mid-April. He will put us in to his schedule and will provide us a plugging report.

Mike

-----Original Message-----
From: Price, Wayne [mailto:WPrice@state.nm.us]
Sent: Tuesday, March 05, 2002 11:52 AM
To: 'Mike Griffin'
Subject: RE: Skelly-Penrose Monitor Well Closure

The web site does not work for me. Please provide another or physical address.

-----Original Message-----
From: Mike Griffin [mailto:whearth@iamerica.net]
Sent: Monday, March 04, 2002 3:40 PM
To: Price, Wayne
Subject: RE: Skelly-Penrose Monitor Well Closure

As Homer Simpson would say, "Doh!"

Send to Randy Ray @ Prize Energy www.rray@prizeenergy.com.

Also, I spoke to Atkins again and was advised that it may be mid April before he finds a hole in his schedule.

Mike

-----Original Message-----
From: Price, Wayne [mailto:WPrice@state.nm.us]
Sent: Monday, March 04, 2002 3:46 PM
To: 'Mike Griffin'
Subject: RE: Skelly-Penrose Monitor Well Closure

I need the name of person, company name and address of current operator in order to send closure approval!

-----Original Message-----
From: Mike Griffin [mailto:whearth@iamerica.net]
Sent: Monday, March 04, 2002 10:40 AM
To: Wayne Price
Cc: Randy Ray

Subject: Skelly-Penrose Monitor Well Closure

Dear Wayne:

After I got off of the phone with you this morning, I did contact Mr. Ray & obtained approval for the plugging of all three wells at the Skelly-Penrose site. Each well will be grouted to surface by Atkins Engineering during the month of March.

Do you need anything from Atkins to confirm the activity?

Mike

Price, Wayne

From: Price, Wayne
Sent: Monday, March 04, 2002 2:43 PM
To: 'Mike Griffin'
Subject: RE: Skelly-Penrose Monitor Well Closure

Please provide the plugging report.

-----Original Message-----
From: Mike Griffin [mailto:whearth@iamerica.net]
Sent: Monday, March 04, 2002 10:40 AM
To: Wayne Price
Cc: Randy Ray
Subject: Skelly-Penrose Monitor Well Closure

Dear Wayne:

After I got off of the phone with you this morning, I did contact Mr. Ray & obtained approval for the plugging of all three wells at the Skelly-Penrose site. Each well will be grouted to surface by Atkins Engineering during the month of March.

Do you need anything from Atkins to confirm the activity?

Mike

Price, Wayne

From: Mike Griffin [whearth@iamerica.net]
Sent: Monday, March 04, 2002 3:40 PM
To: Price, Wayne
Subject: RE: Skelly-Penrose Monitor Well Closure

As Homer Simpson would say, "Doh!"

Send to Randy Ray @ Prize Energy www.rray@prizeenergy.com.

Also, I spoke to Atkins again and was advised that it may be mid April before he finds a hole in his schedule.

Mike

-----Original Message-----
From: Price, Wayne [mailto:WPrice@state.nm.us]
Sent: Monday, March 04, 2002 3:46 PM
To: 'Mike Griffin'
Subject: RE: Skelly-Penrose Monitor Well Closure

I need the name of person, company name and address of current operator in order to send closure approval!

-----Original Message-----
From: Mike Griffin [mailto:whearth@iamerica.net]
Sent: Monday, March 04, 2002 10:40 AM
To: Wayne Price
Cc: Randy Ray
Subject: Skelly-Penrose Monitor Well Closure

Dear Wayne:

After I got off of the phone with you this morning, I did contact Mr. Ray & obtained approval for the plugging of all three wells at the Skelly-Penrose site. Each well will be grouted to surface by Atkins Engineering during the month of March.

Do you need anything from Atkins to confirm the activity?

Mike

Price, Wayne

From: Price, Wayne
Sent: Monday, March 04, 2002 2:46 PM
To: 'Mike Griffin'
Subject: RE: Skelly-Penrose Monitor Well Closure

I need the name of person, company name and address of current operator in order to send closure approval!

-----Original Message-----
From: Mike Griffin [mailto:whearth@iamerica.net]
Sent: Monday, March 04, 2002 10:40 AM
To: Wayne Price
Cc: Randy Ray
Subject: Skelly-Penrose Monitor Well Closure

Dear Wayne:

After I got off of the phone with you this morning, I did contact Mr. Ray & obtained approval for the plugging of all three wells at the Skelly-Penrose site. Each well will be grouted to surface by Atkins Engineering during the month of March.

Do you need anything from Atkins to confirm the activity?

Mike

Price, Wayne

[redacted]

From: Price, Wayne

Sent: Thursday, February 08, 2001 10:38 AM

To: 'Urbanski, David'

Subject: RE: Skelly-Penrose

Dear David:

I failed to tell you these monitor wells should be constructed as permanent wells!

From: Urbanski, David[SMTP:David.Urbanski@usa.apachecorp.com]

Sent: Wednesday, February 07, 2001 1:31 PM

To: 'Wayne Price'

Subject: Skelly-Penrose

<<File: MW2&3 location.doc>><<File: skelly-penrose draw2.xls>>

<<MW2&3 location.doc>> <<skelly-penrose draw2.xls>>

David E. Urbanski

Environmental Coordinator

Apache Corporation

713-296-6555

713-296-7250 fax

Price, Wayne IR0026

From: Price, Wayne

Sent: Thursday, February 08, 2001 8:15 AM

To: 'Urbanski, David'

Subject: RE: Skelly-Penrose

The location of the two new proposed monitor wells is hereby approved! Please submit your findings by March 30, 2001.

From: Urbanski, David[SMTP:David.Urbanski@usa.apachecorp.com]

Sent: Wednesday, February 07, 2001 1:31 PM

To: 'Wayne Price'

Subject: Skelly-Penrose

<<File: MW2&3 location.doc>><<File: skelly-penrose draw2.xls>>

<<MW2&3 location.doc>> <<skelly-penrose draw2.xls>>

David E. Urbanski

Environmental Coordinator

Apache Corporation

713-296-6555

713-296-7250 fax

2000 POST OAK BOULEVARD / SUITE 100 / HOUSTON, TEXAS 77056-4400

Apache CORPORATION

WWW.APACHECORP.COM
[713] 296-6000

IR0026

February 7, 2001

Mr. Wayne Price
NMOCD
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Sent Via Fax and U.S. Postal Service

Subject: Additional Monitor Well Locations
Skelly Penrose "A" CTB Pit
SE/4SE/4 Sec 4-T23S-R37E

Dear Mr. Price:

Enclosed please find a drawing illustrating the proposed locations of two additional temporary monitor wells at the subject property.

Apache proposes to install MW2 approximately 300'-400' southeast of the former pit. The exact location of MW2 will be decided in the field since it is Apache's desire to place the monitor well at a location that is easily accessible but not disruptive to the surrounding pastureland, i.e. an existing well pad.

MW3 will be installed within the boundaries of the well pad that is due east of the former tank battery facility. This will place MW3 approximately 200'-300' feet from the former CTB pit.

Once the wells have been installed and completed, a survey crew will be contracted to survey in the locations and the casing elevations. Depth to water will be measured once sufficient time has passed after development to allow the water to return to static level. The depth to water data will be utilized to calculate a groundwater flow map for the CTB area.

Apache is prepared to start installation of the additional temporary monitor wells shortly after obtaining written NMOCD approval of the proposed well locations. Water samples collected and the subsequent analytical results will be used to determine the necessity of further remedial or investigative actions.

If you have any questions or comments, please contact me at 713-296-6555, or email your written approval, referencing this proposal, to david.urbanski@apachecorp.com.

Thank you for your time and consideration.

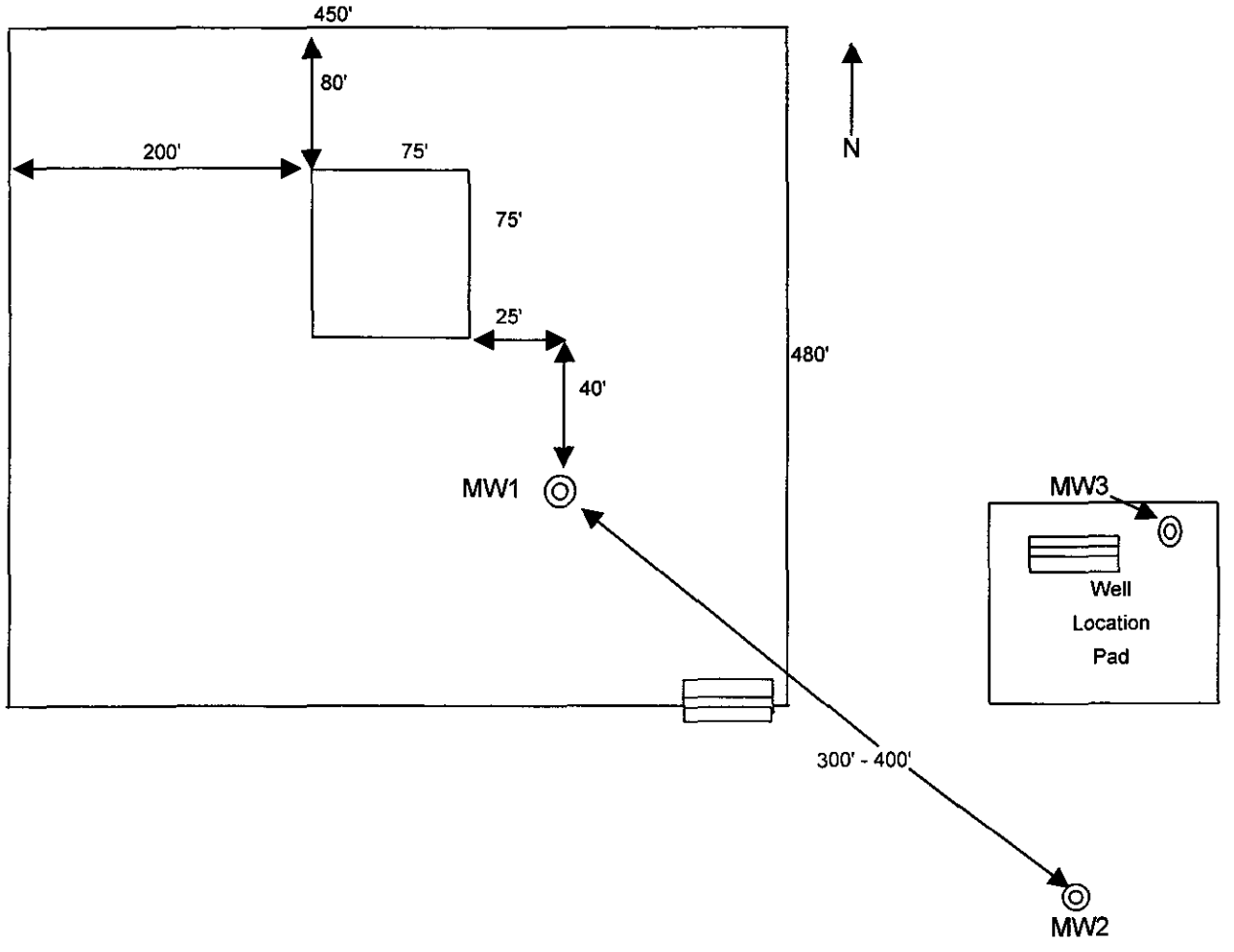
Sincerely,
APACHE CORPORATION

David E. Urbanski

Enc.

CC: OCD Hobbs Office
Doug O'Neil, Southern Region Manager
Paul Griesedieck, Manager EH&S

Skelly-Penrose "A" CTB



Price, Wayne

From: Price, Wayne

Sent: Tuesday, February 06, 2001 11:10 AM

To: 'Urbanski, David'

Subject: RE: Skelly Penrose CTB Former Pit

Dear David:

You really need to propose at least two monitor wells so you can tri-angleulate and obtain the groundwater flow direction gradient! Please submit a drawing showing the location for OCD approval!

From: Urbanski, David[SMTP:David.Urbanski@usa.apachecorp.com]

Sent: Tuesday, February 06, 2001 10:00 AM

To: 'Wayne Price'

Subject: Skelly Penrose CTB Former Pit

Wayne,

Apache Corporation requests your approval of the following proposal concerning the subject property.

After much consideration, Apache has abandoned the idea of placing a monitor well up-gradient from the CTB pit, and is now proposing to place a well 300' down-gradient from the most southeasterly corner of the pit. The well will be developed and sampled according to proper protocol, and the sample will be analyzed for chloride content.

Once the chloride content has been determined, Apache will consult with NMOCD to determine if natural attenuation will be considered a sufficient method of remediation or if it will be necessary to conduct "pump and

February 5, 2001

Mr. Wayne Price
NMOCD
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Sent Via Fax and U.S. Postal Service

Subject: Proposed Up-gradient Monitor Well
Skelly Penrose "A" CTB Pit
SE/4SE/4 Sec 4-T23S-R37E

Dear Mr. Price:

In a letter dated December 19, 2000, Apache Corporation proposed to install an up-gradient temporary monitor well at the subject site. Apache's first step toward accomplishing this goal was to measure and sketch the facility and then submit a drawing with the proposed well location for your approval.

Enclosed please find the aforementioned drawing with the pertinent details included. As proposed in the December letter, Apache wishes to place the temporary monitor well within the boundary of the CTB yard to prevent disruption of the surrounding pastureland. If placed as shown on the sketch, the well will be approximately 110'-115' from the closest corner of the former pit. I believe this distance is sufficient for retrieval of a representative up-gradient sample.

Apache is prepared to start installation of the up-gradient temporary monitor well shortly after obtaining written NMOCD approval of the proposed well location. Water samples collected and the subsequent analytical results will be used to determine the necessity of further remedial or investigative actions.

If you have any questions or comments, please contact me at 713-296-6555, or email your written approval, referencing this proposal, to david.urbanski@apachecorp.com.

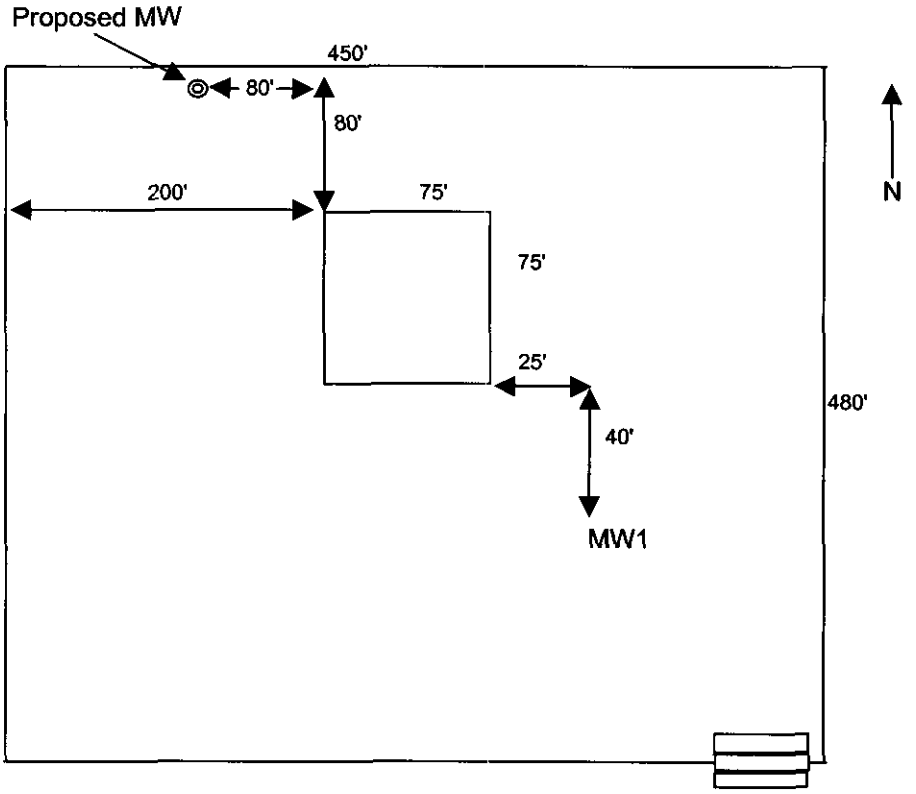
Thank you for your time and consideration.

Sincerely,
APACHE CORPORATION

David E. Urbanski

CC: OCD Hobbs Office
Doug O'Neil, Southern Region Manager
Paul Griesedieck, Manager EH&S

Skelly-Penrose "A" CTB



Price, Wayne

From: Urbanski, David[SMTP:David.Urbanski@usa.apachecorp.com]

Sent: Monday, February 05, 2001 1:08 PM

To: 'Wayne Price'

Subject: Skelly-Penrose

Wayne,

I attempted to fax this earlier with unfavorable results. Hard copy will be mailed as well, but I wanted to submit this proposal to you as soon as possible.

Please call or reply with questions or comments.

Thanks,

David E. Urbanski
Environmental Coordinator
Apache Corporation
713-296-6555
713-296-7250 fax

<<MW2 location.doc>> <<skelly-penrose draw.xls>>

Price, Wayne

From: Urbanski, David[SMTP:David.Urbanski@usa.apachecorp.com]
Sent: Tuesday, February 06, 2001 10:00 AM
To: 'Wayne Price'
Subject: Skelly Penrose CTB Former Pit

Wayne,

Apache Corporation requests your approval of the following proposal concerning the subject property.

After much consideration, Apache has abandoned the idea of placing a monitor well up-gradient from the CTB pit, and is now proposing to place a well 300' down-gradient from the most southeasterly corner of the pit. The well will be developed and sampled according to proper protocol, and the sample will be analyzed for chloride content.

Once the chloride content has been determined, Apache will consult with NMOCD to determine if natural attenuation will be considered a sufficient method of remediation or if it will be necessary to conduct "pump and disposal" from the first monitor well.

Please call to discuss this proposal, or reply with your approval or rejection.

Sincerely,

David E. Urbanski
Environmental Coordinator
Apache Corporation
713-296-6555
713-296-7250 fax

1R0026

2000 POST OAK BOULEVARD / SUITE 100 / HOUSTON, TEXAS 77056-4400

Apache CORPORATION

WWW.APACHECORP.COM
[713] 296-6000

December 19, 2000

Mr. Wayne Price
NMOCD
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Subject: Skelly Penrose "A" CTB Pit
SE/4SE/4 Sec 4-T23S-R37E

Dear Mr. Price:

Apache respectfully submits the following proposal concerning the installation of an additional temporary monitor well at the subject site.

As you are aware, Apache installed and developed a temporary monitor well at the southeast corner of the remediated pit. Samples were collected from the well on two different occasions and submitted to a lab for analytical testing. Both times the analytical results indicated that the groundwater contained chlorides in the 3200 ppm range. The NMOCD speculated that the pit was the source of the elevated chlorides.

Portions of the Ogallala containing elevated chlorides are known to exist throughout Lea County. Apache suggested that the Skelly-Penrose lease might be located in one of those elevated chloride areas. In order to determine the background chloride content of the groundwater in the vicinity of the pit, Apache proposes to install a second temporary monitor well up-gradient from the pit.

The well will be installed within the boundaries of the CTB yard. An Apache representative will visit the site, select a location for the well, and submit a sketch of the site, including dimensions, for NMOCD approval of the monitor well location. Once approval has been acquired, Apache will install and develop the monitor well according to proper protocol so that a representative sample can be collected.

Should the sample results indicate that the water in the up-gradient monitor well contains approximately the same level of chlorides as the first monitor well, Apache will request NMOCD approved final closure of the remediation of the CTB pit. The two temporary monitor wells will be plugged and abandoned according to NM guidelines.

If results indicate that the chloride content of the groundwater in the up-gradient monitor well deviates from the chloride content of the water from the first monitor well, Apache will contact the NMOCD to discuss the necessity of subsequent remedial or investigative actions.

Apache Corporation is prepared to complete the activities delineated in this proposal by January 31, 2001, and will notify the NMOCD 48 hours prior to conducting the well installation.

If you have any questions or comments, please contact me at 713-296-6555.

Sincerely,
APACHE CORPORATION

David E. Urbanski

Cc: OCD Hobbs Office
Doug O'Neil, Southern Region Manager
Paul Griesedieck, Manager EH&S

Price, Wayne (IR026)

From: Price, Wayne

Sent: Monday, February 05, 2001 1:21 PM

To: 'Urbanski, David'

Subject: RE: Skelly-Penrose

Dear David:

The staff has reviewed your plan and have determine your proposed up-gradient well is too close to the pit. Please re-submit!

From: Urbanski, David[SMTP:David.Urbanski@usa.apachecorp.com]

Sent: Monday, February 05, 2001 1:08 PM

To: 'Wayne Price'

Subject: Skelly-Penrose

<<File: MW2 location.doc>><<File: skelly-penrose draw.xls>>

Wayne,

I attempted to fax this earlier with unfavorable results. Hard copy will be mailed as well, but I wanted to submit this proposal to you as soon as possible.

Please call or reply with questions or comments.

Thanks,

David E. Urbanski

Environmental Coordinator

Apache Corporation

Price, Wayne

From: Price, Wayne
Sent: Thursday, November 30, 2000 2:09 PM
To: 'Urbanski, David'
Subject: RE: Skelly-Penrose CTB

Approved!

From: Urbanski, David[SMTP:David.Urbanski@usa.apachecorp.com]
Sent: Wednesday, November 29, 2000 2:04 PM
To: 'Wayne Price'
Subject: Skelly-Penrose CTB

Wayne,

We have obtained results from the second sampling of the temporary monitor well at the subject site. The results indicate that the chloride level in the water is slightly above 3200ppm as it was the first time we sampled.

I will be out of the office a considerable amount of time over the next two weeks, so I would like to request a December 22, 2000 deadline to submit my plume delineation and/or remediation proposal.

Please call or reply with questions or comments.

Sincerely,

David E. Urbanski
Environmental Coordinator
Apache Corporation
713-296-6555
713-296-7250 fax

Price, Wayne

From: Urbanski, David[SMTP:David.Urbanski@usa.apachecorp.com]
Sent: Wednesday, November 15, 2000 7:32 AM
To: 'Wayne Price'
Subject: Skelly Sampling

Wayne,

Mike Griffin has sampled the Skelly-Penrose temporary well and submitted the sample to the lab for analysis. We should have results by tomorrow or Friday. I realize that we had a Nov. 15 deadline, but scheduling problems caused us to have the two day delay.

I will convey the results to you as soon as we have them.

Call or reply with questions.

Thanks,

David E. Urbanski
Environmental Coordinator
Apache Corporation
713-296-6555
713-296-7250 fax

Price, Wayne

From: Price, Wayne
Sent: Thursday, October 26, 2000 4:03 PM
To: 'Urbanski, David'
Subject: RE: Skelly Penrose "A" CTB

Approved!

From: Urbanski, David[SMTP:David.Urbanski@usa.apachecorp.com]
Sent: Thursday, October 26, 2000 3:45 PM
To: Price, Wayne
Subject: Skelly Penrose "A" CTB

Wayne,

As you are aware, the analytical results from the previous sampling of the temporary monitor well at the subject property indicated a chloride level above the NM standards for drinking water. Before we progress with additional well installation, I would like to propose that Apache re-sample the well in order to rule out the possibility of sample contamination.

If you will allow us to do so, we will re-sample the well and submit results to your office by November 15, 2000. Once we have received the results of the re-sampling, we will contact you to discuss our next step.

Thank you for your time and consideration. I will be awaiting your reply.

David E. Urbanski
Environmental Coordinator
Apache Corporation
713-296-6555
713-296-7250 fax

2000 POST OAK BOULEVARD / SUITE 100 / HOUSTON, TEXAS 77056-4400

Apache CORPORATION

WWW.APACHECORP.COM
[713] 296-6000

October 5, 2000

Mr. Wayne Price
NMOCD
2040 South Pacheco Street
Santa Fe, New Mexico 87505

RE: Skelly Penrose "A" CTB Pit
SE/4SE/4 Sec 4-T23S-R37E

Dear Mr. Price:

Apache Corporation is in receipt of your letter dated September 6, 2000, pertaining to the above referenced project. I apologize for the tardiness of my response, but I have been quite busy of late with several issues in the Permian Basin.

Apache Corporation proposes to research the geological and hydrogeological components of the area surrounding the Skelly Penrose pit in order to obtain information that would assist us in determining possible sources for the elevated chlorides in the water adjacent to the pit. Coring and excavating activities within the area have revealed salt layers within the soil strata and perched water tables containing water that exceeds the NM Water Quality Standards in more than one of the criteria.

I hope to complete my research by mid-October and submit a report of findings by the end of the month. If you have any questions or comments, please contact me at 713-296-6555.

Sincerely,
APACHE CORPORATION

David E. Urbanski

David E. Urbanski

Cc: OCD Hobbs Office
Paul Griesedieck, Manager EH&S

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

September 6, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 4942

David E. Urbanski
Apache Corporation
2000 Post Oak Boulevard
Suite 100
Houston, Texas 77056-4400

RE: Skelly Penrose "A" Central Battery Pit: (Abandoned emergency overflow pit)
Located: SE/4SE/4 Sec 4-Ts23s-R37e
Monitor Well Results

Dear Mr. Urbanski:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Whole Earth Environmental, Inc.'s letter dated July 31, 2000 concerning the above captioned site. The monitor well results indicate chloride concentrations of 3687 mg/l which exceeds the New Mexico Water Quality Standards of 250 mg/l. The letter is requesting closure of the site due to the lack of any BTEX component within the water and suggest that the chloride contamination is from an off-site source.

In order for OCD to properly evaluate your request, Apache Corporation shall submit an investigation work plan for OCD approval that will demonstrate your claim. The work plan will be submitted to the OCD Santa Fe Office by October 6, 2000 with a copy provided to the OCD Hobbs District Office.

Sincerely;

Wayne Price-Pet. Engr. S

Cc: OCD Hobbs Offic

Oil Conservation
Phone: (505)

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

APACHE CORPORATION
2000 POST OAK BLVD.
SUITE 100
HOUSTON, TEXAS 77056-4400

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* A. M. George — B. Date of Delivery 9-11-00

C. Signature X G. M. [illegible] ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☑ Certified Mail ☐ Express Mail
☑ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Copy from service label)* 5051 4942

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

WHOLE EARTH

Whole Earth Environmental, Inc.
19606 San Gabriel, Houston, Texas 77084
281/492-7077 • Fax: 281/646-8996

July 31, 2000

New Mexico Oil Conservation Division
2040 South Pacheco St.
Sante Fe, NM 87505

Attn: Wayne Price
Subject: Skelly Penrose Monitor Well Results

Dear Wayne:
Attached, please find a copy of the boring log, chain of custody, and analytical results for the monitor well drilled adjacent to the Skelly – Penrose pit near Eunice, New Mexico.

The well was drilled to a total depth of 65' below ground level approximately 8' into the ground water, temporarily cased, and developed on July 13. Gary Wink with the NMOCD witnessed the additional bailing of 5 gallons of water prior to split samples being removed on July 19th.

The results of laboratory testing reveal significant chloride concentrations however there are no detectable hydrocarbons. The total lack of any BTEX component within the water indicates that the chloride concentrations are not associated with the pit but are either native to the site or the result of other, unrelated brine contamination up-gradient from the pit area. We therefore request final closure of the site.

If you've any questions or comments, please do not hesitate to call.

Warmest personal regards,

Mike Griffin
President
Whole Earth Environmental, Inc.

CC: David Urbanski / Apache Corporation
Donna Williams / NMOCD Hobbs

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

WHOLE EARTH ENVIRONMENTAL
ATTN: MR. ELLIOT WERNER
19606 SAN GABRIEL
HOUSTON, TEXAS 77084
FAX: 1-281-646-8996

SampleType: Water
Sample Condition: Intact/ Iced/ 36 deg. F
Project #: Apache
Project Name: None Given
Project Location: Eunice Skelly Penrose

Sampling Date: 07/19/00
Receiving Date: 07/19/00
Analysis Date: 07/20/00

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
28314	MW-1	<0.001	<0.001	<0.001	<0.001	<0.001
% IA		95	94	94	105	95
% EA		93	90	92	103	93
BLANK		<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8021B,5030

Raland K. Tuttle

7-20-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

WHOLE EARTH ENVIRONMENTAL
ATTN: MR. ELLIOT WERNER
19606 SAN GABRIEL
HOUSTON, TEXAS 77084
FAX: 1-281-646-8996

Sample Type: Water
Sample Condition: Intact/ Iced/ 36 deg. F
Project #: Apache
Project Name: None Given
Project Location: Eunice Skelly Penrose

Sampling Date: 07/19/00
Receiving Date: 07/19/00
Analysis Date: 07/20/00

ELT#	FIELD CODE	Chloride mg/L
28314	MW-1	3687

QUALITY CONTROL	5211
TRUE VALUE	5000
% PRECISION	104
BLANK	<5

Methods: EPA 325.3

Raland K. Tuttle

7-20-00
Date

Environmental Lab of Texas, Inc.

12600 West I-20 East Odessa, Texas 79763
(915) 563-1800 FAX (915) 563-1713

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: Elliot Werner

Phone #: (505) 632-4358

FAX #:

Company Name & Address:

Project #: Apache

Project Name:

Project Location: Eunice Skelly Penrose

Sampler Signature:

ANALYSIS REQUEST

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	OTHER	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	OTHER	SAMPLING: DATE	TIME	BTEX #8020/5030	TPH 418.1	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	TDS	RCI	Chlorides
28314	MW 1	1		✓						✓	✓			7/19	10:40									
~~28315~~	MW 1	1		✓							✓			7/19	10:40									✓

Relinquished by:	Date:	Time:	Received by:
[signature]	7/19/00	12:15	[signature]
Relinquished by:	Date:	Time:	Received by:
Relinquished by:	Date:	Time:	Received by Laboratory:

REMARKS

36°

Atkins Engineering Associates, Inc. 2904 W. 2nd St., Roswell, NM 88202-3156	LOG OF BORING Kelly/Penrose Apache 1 (Page 1 of 2)

Whole Earth
19606 San Gabriel
Houston, Texas 77084

Elliot Werner

WHOLETH.THD.00

Date	: 07/13/00	Site Location	: 13 mi. S. Eunice
Drill Start	: 9:15 a.m.		: NM 13 & 1mi. E.
Drill End	: 4:00 p.m.	Auger Type	: Hollow Stem
Boring Location	: 30" SE of SE Pit. Corner	Logged By	: Mort Bates

Depth in Feet	GRAPHIC	USCS	Samples	DESCRIPTION	Lab mg/kg	PID ppm-v
0		SM		Silty Sand, w/ Caliche Rock, Loose, Dry		
		SM		Silty Sand, Tan, Loose, Damp		
5		SC		Clayey Sand, Tan, Loose, Damp		
10						
15		SC		Clayey Sand w/Caliche, Tan, Firm, Damp		
20		SP		Sand, Poorly Graded, Red, Loose, Dry		
25		SC		Clayey Sand, Tan, Loose, Dry		
30						
35						
40						

50' of 2" PVC casing (temporary)

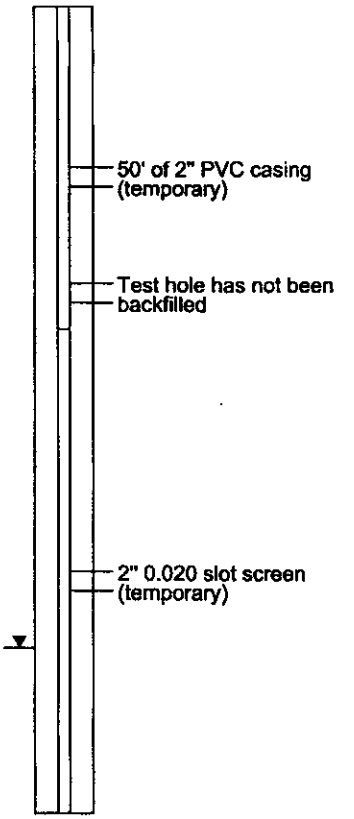
Test hole has not been backfilled

07-14-2000 C:\MTECH46\WHOLE\kelly.bor

Atkins Engineering Associates, Inc. 2904 W. 2nd St., Roswell, NM 88202-3156	LOG OF BORING Kelly/Penrose Apache 1 (Page 2 of 2)

Whole Earth 19606 San Gabriel Houston, Texas 77084	Date	: 07/13/00	Site Location	: 13 mi. S. Eunice : NM 13 & 1mi. E.
	Drill Start	: 9:15 a.m.		
Elliot Werner	Drill End	: 4:00 p.m.	Auger Type	: Hollow Stem
WHOLETH.THD.00	Boring Location	: 30" SE of SE Pit. Corner	Logged By	: Mort Bates

Depth in Feet	GRAPHIC	USCS	Samples	DESCRIPTION	Lab mg/kg	PID ppm-v
40				Clayey Sand, Tan, Loose, Dry		
45		SC				
50		SS		Cemented Sandstone, Well Graded, Hard, Dry		
55		SP		Sand, Poorly Graded, Tan, Soft, Moist		
		CL		Clay, Red, Stiff, Damp		
60						
65				WL=59.86 TD=65"		
70						
75						
80						



07-14-2000 C:\MTECH46\WHOLE\kelly.bor

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

June 5, 2000

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 5673

David E. Urbanski
Apache Corporation
2000 Post Oak Boulevard
Suite 100
Houston, Texas 77056-4400

RE: Skelly Penrose "A" Central Battery Pit: (Abandoned emergency overflow pit)
Located: SE/4SE/4 Sec 4-Ts23s-R37e
Pit Closure Report

Dear Mr. Urbanski:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Apache Corporation's (Apache) letter dated May 23, 2000 concerning the above captioned site. Apache proposed to place permanent markers around the pit and investigate vadose zone contamination under the closed pit area by installing a boring adjacent to the pit area.

The previous reports reviewed by OCD have indicated that Apache has delineated the lateral contamination but the vertical component was not fully delineated. While Apache's approach of checking for transverse dispersion has merit, OCD has experienced that preferential pathways may exist directly below pits and in very small corridors leading to substantial groundwater contamination. Therefore, OCD feels the borehole should be completed into the underlying groundwater table. **The OCD hereby approves of the submitted proposal subject to the following additional conditions:**

1. Apache shall complete the borehole at least 10 feet into the underlying groundwater table. The borehole shall be located adjacent and near the southeast corner of the pit.

2. Groundwater samples shall be collected and analyzed for BTEX (EPA method 8021) and General Chemistry (EPA 40 CFR 136.3). The borehole shall remain open for a minimum of 24 hours and then purged five (5) well bore volumes of groundwater before collecting samples.

3. Apache will notify OCD 48 hours in advance so OCD may witness the drilling activity and/or split samples during OCD's normal business hours.

4. Apache shall have the option to plug the borehole with cement grout or complete as a monitor well. If Apache chooses to complete the borehole as a monitor well then it must be pre-approved and completed pursuant to OCD standards.

Apache shall submit the results of their investigation by July 15, 2000. If you have any questions please contact me at 505-827-7155.

Sincerely;

Wayne Price

Wayne Price-Pet. Engr. Spec.

Cc: OCD Hobbs Office

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

APACHE CORPORATION
2000 POST OAK BLVD.
SUITE 100
HOUSTON, TEXAS 77056-4400
ATT: DAVID E. URBANSKI

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) ALLAN McGEORGE B. Date of Delivery 6-8-00

C. Signature X ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Copy from service label) 5051 5673

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

2000 POST OAK BOULEVARD / SUITE 100 / HOUSTON, TEXAS 77056-4400

Apache CORPORATION

WWW.APACHECORP.COM
[713] 296-6000

May 23, 2000

Mr. Wayne Price
NMOCD
2040 South Pacheco Street
Santa Fe, NM 87505

Re: Skelly Penrose "A" Central Battery Pit Closure
SE/4,SE/4 Sec 4-T23S-R37E

Dear Mr. Price:

Apache Corporation is in receipt of your letter dated April 19, 2000 concerning the above referenced pit closure. You requested that Apache submit a plan to determine if groundwater had been impacted by the pit and documentation that the buried liner in the pit will be protected in the future.

In reference to the groundwater issue, Apache proposes to drill one 65' deep borehole directly adjacent to the backfilled pit. The boring will be drilled as close to the pit as possible without interfering with the integrity of the pit liner. Samples will be collected at 5' intervals starting at 40' and ending at the 65' total depth, and can be split with NMOCD personnel at your request. The samples will be preserved and transported utilizing proper protocol, and analyzed for TPH and chloride content.

Should the analytical results prove that the chloride and TPH concentrations dissipate to background levels or lower before reaching the 65' depth, then an impact to groundwater did not occur and the borehole will be grouted to the surface and no further investigation conducted.

In the event that contaminant levels continue to be significantly above background or higher than New Mexico standards at the 65' depth, the borehole will be re-entered and drilled down to water bearing strata for development as a monitor well. Once the well is developed, a sample will be collected and analyzed for TPH and chloride content. Should the analytical results prove that groundwater has not been impacted, the pump and casing will be removed and the wellbore grouted utilizing proper well abandonment methods.

If analytical results indicate that groundwater has been impacted by the pit, Apache will reassess the situation at that time and submit a proposal to delineate the contaminant plume if necessary.

Apache Corporation is committed to the protection and preservation of the environment. Apache will construct four steel markers and place them at the corners of the backfilled pit as a permanent reminder of the pit location. The markers will have the word "PIT" welded on them and an arrow indicating the location of the pit in relation to the marker. All Apache employees involved with the operation of the Skelly Penrose field will be made aware of the pit location and instructed to contact the foreman before any construction or demolition is conducted at the site.

All of the correspondence and data relating to this pit will be kept in a file at the Houston office and a copy placed in the files at the Wink, Texas field office for future reference.

Apache Corporation respectfully submits this proposal for your consideration. Drilling and sampling can commence shortly after NMOCD written approval is received in the Apache Houston office. Pit markers will be placed during the time that borehole drilling is being conducted. Should you have any questions or wish to discuss other options, please contact me at 713-296-6555.

Thank you for your time and consideration.

Sincerely,
APACHE CORPORATION

David E. Urbanski

David E. Urbanski
Environmental Coordinator

cc: Paul Griesedieck, Manager EH&S
Doug O'Neil, Regional Manager
Donna Williams, NMOCD Hobbs

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

April 19, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 4690

David E. Urbanski
Apache Corporation
2000 Post Oak Boulevard
Suite 100
Houston, Texas 77056-4400

RE: Skelly Penrose "A" Central Battery Pit: (Abandoned emergency overflow pit)
Located: SE/4SE/4 Sec 4-Ts23s-R37e
Pit Closure Report

Dear Mr. Urbanski:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the letter dated March 21, 2000 with attached closure report. The report indicates Apache conducted a soil boring and collected soil samples from the middle of the pit approximately 40-42 feet below surface grade. The results of the bottom hole sample were reported to be <5.0 ppm TPH, <.50 BTEX and 4.6 ppm of chlorides.

The report indicates the pit was excavated down to 40 foot below grade surface. Bottom hole samples taken at this time revealed the presence of total petroleum hydrocarbons at 134 ppm and chloride concentration of 3400 ppm still remaining at the bottom of the excavation, which was reported to be approximately 40 feet below grade surface. The distance to ground water below the bottom of the excavation is reported to be 9.23 meters in the modeling report. The model predicted whether remaining contaminants will impact groundwater in the foreseeable future.

The model did not indicate the amount of contamination that has passed through the vadose zone, between the bottom of the pit and top of groundwater, during the time the pit was being used. The report does not adequately demonstrate that ground water has not been impacted from past operations. In order for OCD to properly evaluate the closure, Apache shall submit the following information:

1. A plan to determine if groundwater has been impacted.

2. Apache shall submit documentation to demonstrate that the buried liner will be protected in the future.

Please submit the above requested information by June 01, 2000.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

Wayne Price-Pet. Engr. Spec.
Environmental Bureau
cc: OCD Hobbs office

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

APACHE CORPORATION
2000 POST OAK BLVD.
SUITE 100
HOUSTON, TEXAS 77056-4400
ATT: DAVID URBANSKI

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) HUNA LY — B. Date of Delivery 04-24-00

C. Signature X — ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☒ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Copy from service label) 5051 4690

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

February 9, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. Z 142 564 939

Mr. Michael Bernard
Apache Corporation
2000 Post Oak Boulevard
Suite 100
Houston, Texas 77056-4400

Re : Apache Corporation Skelly Penrose Pit Closure

Dear Mr. Bernard:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Apache Corporation's (AC) Pit Closure Protocol submitted by Whole Earth Environmnetal dated October 11, 1999 and the pit bottom Re-Test dated January 20, 2000. The pit is presently dug out to 40 feet below ground surface. The NMOCD took split samples during the last sampling event and the results indicate there is remaining contaminants below the pit bottom. NMOCD's sampling results reveal chlorides at 3400 mg/kg and diesel range organics >C28 at 134 mg/mg. The vertical distance between the bottom of the pit and the top of water was reported to be 34 feet.

Apache's report indicates that the major source of contamination has been removed and request closure by installing a bottom and top liner and placing the remediated soils between the liners. The NMOCD hereby approves of the closure plan with the following additional conditions:

1. The closure report shall include Apache's commitment as outlined in Whole Earth's PR-22B 8.0 Closure report and shall include the final third party soil analytical results for all soils placed back into the hole between the liners. The samples collected shall be tested for BTEX, TPH and Chlorides. Closure results shall be submitted by April 30, 2000.

   AC will notify the OCD Santa Fe office and the OCD District office at least 48 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples. This event shall take place during NMOCD's normal working hours.

19606 San Gabriel
Houston, Tx. 77084
Phone: (281) 492-7077
Fax: (281) 646-8996

FAX COVER PAGE

To: Wayne Price

From: Mike Griffin

Company: NMOCD

Company: Whole Earth Environmental, Inc.

Fax No.: 505. 827. 8177

Pages including cover sheet: 6

Subject: Apache Skelly Penrose Split Sample Results

Message:

Date: 1 / 20 / 00

To: Wayne Price / NMOCD

From: Mike Griffin / Whole Earth Environmental

Date: January 20, 2000

Subject: Apache Corporation Skelly Penrose Re-test Results

Attached, please find copies of the test results obtained from a split sample collected last week on the Skelly Penrose pit. As you will note, we've essentially non-detectable hydrocarbons and only moderate chloride concentrations.

If your own test results prove to be similar to ours we request that we be allowed to perform the final closure as outlined within our protocol PR-22B submitted October 11, 1999.

Thank you again for your consideration.

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

WHOLE EARTH ENVIRONMENTAL
ATTN: MR. MIKE GRIFFIN
19606 SAN GABRIEL
HOUSTON, TEXAS 77084
FAX: 1-281-646-8996

Sample Type: Soil
Sample Condition: Intact/Iced
Project #: Apache Eunice Pit Bottom Retest
Project Name: None Given
Project Location: Eunice

Sampling Date: 01/12/00
Receiving Date: 01/13/00
Analysis Date: 01/13/00

ELT#	FIELD CODE	GRO C8-C10 mg/kg	DRO >C10-C28 mg/kg
22754	AB	<10	20
	% IA	86	86
	%EA	96	85
	BLANK	<10	<10

Methods: EPA SW 846-8015M GRO/DRO

Roland K Tuttle

1-14-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

WHOLE EARTH ENVIRONMENTAL
ATTN: MR. MIKE GRIFFIN
19606 SAN GABRIEL
HOUSTON, TEXAS 77084
FAX: 1-281-646-8996

SampleType: Soil
Sample Condition: Intact/ Iced
Project #: Apache Eunice Pit Bottom Retest
Project Name: None Given
Project Location: Eunice

Sampling Date: 01/12/00
Receiving Date: 01/13/00
Analysis Date: 01/13/00

ELT#	FIELD CODE/ DATE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
22754	AB	<0.100	<0.100	<0.100	<0.100	<0.100
	% IA	94	90	88	90	88
	% EA	102	98	98	98	98
	BLANK	<0.100	<0.100	<0.100	<0.100	<0.100

METHODS: SW 846-8021B,5030

Raland K. Tuttle

1-14-00
Date

Environmental Lab of Texas, Inc.

12600 West I-20 East Odessa, Texas 79763
(915) 563-1800 FAX (915) 563-1713

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: M. Griffin
Phone #: (800) 854-4358
FAX #: (281) 646-8996
Company Name & Address: 19606 San Gabriel Houston Tx. 77084
Project #: Apache Eunice Pit Bottom Retest
Project Name:
Project Location: Eunice
Sampler Signature: M. Griffin

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	OTHER	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	OTHER	SAMPLING: DATE	TIME	ANALYSIS REQUEST: BTEX 8021B/5030	TPH 418.1 DRO/GRO	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	TDS	HCl
22754	AB	1		✓							✓			1-2-00	2:30	✓	✓						

Relinquished by:	Date:	Time:	Received by:
M. Griffin	1-3-00	0950	Richard Goode
Relinquished by:	Date:	Time:	Received by:
Relinquished by:	Date:	Time:	Received by Laboratory:

REMARKS

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

WHOLE EARTH ENVIRONMENTAL
ATTN: MR. MIKE GRIFFIN
19806 SAN GABRIEL
HOUSTON, TEXAS 77084
FAX: 1-281-646-8996

Sample Type: Soil
Sample Condition: Intact/Iced
Project #: Apache Eunice Pit Bottom Retest
Project Name: None Given
Project Location: Eunice

Sampling Date: 01/12/00
Receiving Date: 01/13/00
Analysis Date: 01/19/00

ELT#	FIELD CODE	Chloride mg/kg
22754	AB	780

QUALITY CONTROL	5140
TRUE VALUE	5000
% PRECISION	103
BLANK	<10

Methods: EPA SW 846-9052

Raland K Tuttle

1-20-00
Date

Report Date: 1/21/00 Order ID Number: A00011503 Page Number: 2 of 6
N/A Apache-Skelly N/A

Analytical Results Report

Sample Number: 138794
Description: 0114001330

Param	Flag	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
BTEX (mg/Kg)										
Benzene		<0.05	50	S 8021B	1/19/00	1/19/00	RC	PB00340	QC00449	0.001
Toluene		<0.05	50	S 8021B	1/19/00	1/19/00	RC	PB00340	QC00449	0.001
Ethylbenzene		<0.05	50	S 8021B	1/19/00	1/19/00	RC	PB00340	QC00449	0.001
M,P,O-Xylene		<0.05	50	S 8021B	1/19/00	1/19/00	RC	PB00340	QC00449	0.001
Total BTEX		<0.05	50	S 8021B	1/19/00	1/19/00	RC	PB00340	QC00449	0.001

Surrogate (mg/Kg)	Result	Dilution	Spike Amount	% Rec	% Rec. Limit	Analyst	Prep Batch #	QC Batch #
TFT	4.97	50	0.1	99	72 - 128	RC	PB00340	QC00449
4-BFB	5.1	50	0.1	102	72 - 128	RC	PB00340	QC00449

Param	Flag	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
Ion Chromatography (IC) (mg/Kg)										
CL		3400	1	E 300.0	1/17/00	1/19/00	JS	PB00338	QC00445	0.5
TPH DRO (mg/Kg)										
DRO	*	134	1	Mod. 8015B	1/17/00	1/17/00	MF	PB00299	QC00413	50
* DRO - Hydrocarbons present past C28.										
TPH GRO (mg/Kg)										
GRO		<5	1	8015B	1/19/00	1/19/00	RC	PB00341	QC00450	0.1

TRACEANALYSIS, INC.

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E-Mail: lab@traceanalysis.com

Analytical and Quality Control Report

Donna Williams
OCD Hobbs Office
1625 N. French Drive
Hobbs, NM 88240

Report Date: 1/21/00

Project Number: N/A
Project Name: Apache-Skelly
Project Location: N/A

Order ID Number: A0001503

Enclosed are the Analytical Results and Quality Control Data Reports for the following samples submitted to TraceAnalysis, Inc. for analysis:

Sample Number	Sample Description	Matrix	Date Taken	Time Taken	Date Received
138794	0114001330	Soil	1/14/00	13:30	1/15/00

These results represent only the samples received in the laboratory. The Quality Control Report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

This report consists of a total of 6 pages and shall not be reproduced except in its entirety, without written approval of TraceAnalysis, Inc.

Dr. Blair Leftwich, Director

Report Date: 1/21/00 Order ID Number: A00011503 Page Number: 6 of 6
N/A Apache-Skelly N/A

Quality Control Report
Continuing Calibration Verification Standard

Standard	Param	Flag	CCVs TRUE Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	Benzene (mg/Kg)		0.1	0.103	103	80 - 120	1/19/00	QC00449
ICV	Toluene (mg/Kg)		0.1	0.104	104	80 - 120	1/19/00	QC00449
ICV	Ethylbenzene (mg/Kg)		0.1	0.103	103	80 - 120	1/19/00	QC00449
ICV	M,P,O-Xylene (mg/Kg)		0.3	0.308	103	80 - 120	1/19/00	QC00449
CCV (1	Benzene (mg/Kg)		0.1	0.099	99	80 - 120	1/19/00	QC00449
CCV (1	Toluene (mg/Kg)		0.1	0.1	100	80 - 120	1/19/00	QC00449
CCV (1	Ethylbenzene (mg/Kg)		0.1	0.098	98	80 - 120	1/19/00	QC00449
CCV (1	M,P,O-Xylene (mg/Kg)		0.3	0.291	97	80 - 120	1/19/00	QC00449
CCV (2	Benzene (mg/Kg)		0.1	0.101	101	80 - 120	1/19/00	QC00449
CCV (2	Toluene (mg/Kg)		0.1	0.103	103	80 - 120	1/19/00	QC00449
CCV (2	Ethylbenzene (mg/Kg)		0.1	0.101	101	80 - 120	1/19/00	QC00449
CCV (2	M,P,O-Xylene (mg/Kg)		0.3	0.304	101	80 - 120	1/19/00	QC00449

Standard	Param	Flag	CCVs TRUE Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	CL (mg/L)		12.5	11.53	92	80 - 120	1/19/00	QC00445
CCV (1	CL (mg/L)		12.5	11.74	94	80 - 120	1/19/00	QC00445

Standard	Param	Flag	CCVs TRUE Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	DRO (mg/Kg)		250	271	108	70 - 130	1/17/00	QC00413
CCV (1	DRO (mg/Kg)		250	302	121	70 - 130	1/17/00	QC00413

Standard	Param	Flag	CCVs TRUE Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	GRO (mg/Kg)		1	0.986	99	80 - 120	1/19/00	QC00450
CCV (1	GRO (mg/Kg)		1	0.881	88	80 - 120	1/19/00	QC00450

Report Date: 1/21/00 Order ID Number: A00011503 Page Number: 5 of 6
N/A Apache-Skelly N/A

Quality Control Report
Lab Control Spikes and Duplicate Spike

	Param	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCS	MTBE (mg/Kg)	<0.05	50	0.1	5.02	100		80 - 120	0 - 20	QC00449
LCS	Benzene (mg/Kg)	<0.05	50	0.1	4.95	99		80 - 120	0 - 20	QC00449
LCS	Toluene (mg/Kg)	<0.05	50	0.1	5	100		80 - 120	0 - 20	QC00449
LCS	Ethylbenzene (mg/Kg)	<0.05	50	0.1	4.92	98		80 - 120	0 - 20	QC00449
LCS	M,P,O-Xylene (mg/Kg)	<0.05	50	0.3	14.6	97		80 - 120	0 - 20	QC00449

Standard	Surrogate	Dil	Spike Amount	Result	% Rec.	% Rec. Limit	QC Batch #
LCS	TFT (mg/Kg)	50	0.1	5.22	104	72 - 128	QC00449
LCS	4-BFB (mg/Kg)	50	0.1	5.39	108	72 - 128	QC00449

	Param	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCSD	MTBE (mg/Kg)	<0.05	50	0.1	5.15	103	3	80 - 120	0 - 20	QC00449
LCSD	Benzene (mg/Kg)	<0.05	50	0.1	4.95	99	0	80 - 120	0 - 20	QC00449
LCSD	Toluene (mg/Kg)	<0.05	50	0.1	4.99	100	0	80 - 120	0 - 20	QC00449
LCSD	Ethylbenzene (mg/Kg)	<0.05	50	0.1	4.92	98	0	80 - 120	0 - 20	QC00449
LCSD	M,P,O-Xylene (mg/Kg)	<0.05	50	0.3	14.7	98	1	80 - 120	0 - 20	QC00449

Standard	Surrogate	Dil.	Spike Amount	Result	% Rec.	% Rec. Limit	QC Batch #
LCSD	TFT (mg/Kg)	50	0.1	5.04	101	72 - 128	QC00449
LCSD	4-BFB (mg/Kg)	50	0.1	5.27	105	72 - 128	QC00449

	Param	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCS	DRO (mg/Kg)	<50	1	250	259	104		70 - 130	0 - 20	QC00413
LCSD	DRO (mg/Kg)	<50	1	250	277	111	7	70 - 130	0 - 20	QC00413

	Param	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCS	GRO (mg/Kg)	<5	1	1	0.997	100		80 - 120	0 - 20	QC00450
LCSD	GRO (mg/Kg)	<5	1	1	0.978	98	2	80 - 120	0 - 20	QC00450

Report Date: 1/21/00 Order ID Number: A00011503 Page Number: 4 of 6
N/A Apache-Skelly N/A

Quality Control Report
Matrix Spike and Matrix Duplicate Spike

Standard	Param	Sample Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
MS	CL (mg/Kg)	3400	1	1250	4564.02	93		80 - 120	0 - 20	QC00445
MSD	CL (mg/Kg)	3400	1	1250	4584.90	95	2	80 - 120	0 - 20	QC00445

Standard	Param	Sample Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
MS	Benzene (mg/Kg)	<0.05	50	0.1	4.9	98		80 - 120	0 - 20	QC00449
MS	Toluene (mg/Kg)	<0.05	50	0.1	4.94	99		80 - 120	0 - 20	QC00449
MS	Ethylbenzene (mg/Kg)	<0.05	50	0.1	4.86	97		80 - 120	0 - 20	QC00449
MS	M,P,O-Xylene (mg/Kg)	<0.05	50	0.3	14.4	96		80 - 120	0 - 20	QC00449

Standard	Surrogate	Result	Dil.	Spike Amount	Analyst	% Rec.		% Rec. Limit	Prep Batch #	QC Batch #
MS	TFT (mg/Kg)	5.04	1	0.1	RC	101		72 - 128	PB00340	QC00449
MS	4-BFB (mg/Kg)	5.2	1	0.1	RC	104		72 - 128	PB00340	QC00449

Standard	Param	Sample Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
MSD	Benzene (mg/Kg)	<0.05	50	0.1	4.7	94	4	80 - 120	0 - 20	QC00449
MSD	Toluene (mg/Kg)	<0.05	50	0.1	4.76	95	4	80 - 120	0 - 20	QC00449
MSD	Ethylbenzene (mg/Kg)	<0.05	50	0.1	4.65	93	4	80 - 120	0 - 20	QC00449
MSD	M,P,O-Xylene (mg/Kg)	<0.05	50	0.3	13.8	92	4	80 - 120	0 - 20	QC00449

Standard	Surrogate	Result	Dil.	Spike Amount	Analyst	% Rec.		% Rec. Limit	Prep Batch #	QC Batch #
MSD	TFT (mg/Kg)	5.06	1	0.1	RC	101		72 - 128	PB00340	QC00449
MSD	4-BFB (mg/Kg)	5.28	1	0.1	RC	106		72 - 128	PB00340	QC00449

Report Date: 1/21/00 Order ID Number: A00011503 Page Number: 3 of 6
N/A Apache-Skelly N/A

Quality Control Report
Method Blanks

Param	Flag	Blank Result	Reporting Limit	Date Analyzed	Prep Batch #	QC Batch #
Benzene (mg/Kg)		<0.05	0.05	1/19/00	PB00340	QC00449
Toluene (mg/Kg)		<0.05	0.05	1/19/00	PB00340	QC00449
Ethylbenzene (mg/Kg)		<0.05	0.05	1/19/00	PB00340	QC00449
M,P,O-Xylene (mg/Kg)		<0.05	0.05	1/19/00	PB00340	QC00449
Total BTEX (mg/Kg)		<0.05	0.05	1/19/00	PB00340	QC00449
Surrogate		Result	Spike Amount	% Rec.	% Rec. Limit	QC Batch #
TFT (mg/Kg)		5.34	0.1	107	72 - 128	QC00449
4-BFB (mg/Kg)		5.34	0.1	107	72 - 128	QC00449

Param	Flag	Blank Result	Reporting Limit	Date Analyzed	Prep Batch #	QC Batch #
CL (mg/Kg)		9.46	0.5	1/19/00	PB00338	QC00445

Param	Flag	Blank Result	Reporting Limit	Date Analyzed	Prep Batch #	QC Batch #
DRO (mg/Kg)		<50	50	1/17/00	PB00299	QC00413

Param	Flag	Blank Result	Reporting Limit	Date Analyzed	Prep Batch #	QC Batch #
GRO (mg/Kg)		<5	0.1	1/19/00	PB00341	QC00450

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Analytical and Quality Control Report

Donna Williams
OCD Hobbs Office
1625 N. French Drive
Hobbs, NM 88240

Report Date: 1/21/00

Project Number: N/A
Project Name: Apache-Skelly
Project Location: N/A

Order ID Number: A00011503

Enclosed are the Analytical Results and Quality Control Data Reports for the following samples submitted to TraceAnalysis, Inc. for analysis:

Sample Number	Sample Description	Matrix	Date Taken	Time Taken	Date Received
138794	0114001330	Soil	1/14/00	13:30	1/15/00

These results represent only the samples received in the laboratory. The Quality Control Report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

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Dr. Blair Leftwich, Director

Report Date: 1/21/00 Order ID Number: A00011503 Page Number: 6 of 6
N/A Apache-Skelly N/A

Quality Control Report
Continuing Calibration Verification Standard

Standard	Param	Flag	CCVs TRUE Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	Benzene (mg/Kg)		0.1	0.103	103	80 - 120	1/19/00	QC00449
ICV	Toluene (mg/Kg)		0.1	0.104	104	80 - 120	1/19/00	QC00449
ICV	Ethylbenzene (mg/Kg)		0.1	0.103	103	80 - 120	1/19/00	QC00449
ICV	M,P,O-Xylene (mg/Kg)		0.3	0.308	103	80 - 120	1/19/00	QC00449
CCV (1	Benzene (mg/Kg)		0.1	0.099	99	80 - 120	1/19/00	QC00449
CCV (1	Toluene (mg/Kg)		0.1	0.1	100	80 - 120	1/19/00	QC00449
CCV (1	Ethylbenzene (mg/Kg)		0.1	0.098	98	80 - 120	1/19/00	QC00449
CCV (1	M,P,O-Xylene (mg/Kg)		0.3	0.291	97	80 - 120	1/19/00	QC00449
CCV (2	Benzene (mg/Kg)		0.1	0.101	101	80 - 120	1/19/00	QC00449
CCV (2	Toluene (mg/Kg)		0.1	0.103	103	80 - 120	1/19/00	QC00449
CCV (2	Ethylbenzene (mg/Kg)		0.1	0.101	101	80 - 120	1/19/00	QC00449
CCV (2	M,P,O-Xylene (mg/Kg)		0.3	0.304	101	80 - 120	1/19/00	QC00449

Standard	Param	Flag	CCVs TRUE Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	Cl. (mg/L)		12.5	11.53	92	80 - 120	1/19/00	QC00445
CCV (1	CL (mg/L)		12.5	11.74	94	80 - 120	1/19/00	QC00445

Standard	Param	Flag	CCVs TRUE Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	DRO (mg/Kg)		250	271	108	70 - 130	1/17/00	QC00413
CCV (1	DRO (mg/Kg)		250	302	121	70 - 130	1/17/00	QC00413

Standard	Param	Flag	CCVs TRUE Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	GRO (mg/Kg)		1	0.986	99	80 - 120	1/19/00	QC00450
CCV (1	GRO (mg/Kg)		1	0.881	88	80 - 120	1/19/00	QC00450

Report Date: 1/21/00 Order ID Number: A00011503 Page Number: 5 of 6
N/A Apache-Skelly N/A

Quality Control Report
Lab Control Spikes and Duplicate Spike

	Param	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec Limit	RPD Limit	QC Batch #
LCS	MTBE (mg/Kg)	<0.05	50	0.1	5.02	100		80 - 120	0 - 20	QC00449
LCS	Benzene (mg/Kg)	<0.05	50	0.1	4.95	99		80 - 120	0 - 20	QC00449
LCS	Toluene (mg/Kg)	<0.05	50	0.1	5	100		80 - 120	0 - 20	QC00449
LCS	Ethylbenzene (mg/Kg)	<0.05	50	0.1	4.92	98		80 - 120	0 - 20	QC00449
LCS	M,P,O-Xylene (mg/Kg)	<0.05	50	0.3	14.6	97		80 - 120	0 - 20	QC00449

Standard	Surrogate	Dil.	Spike Amount	Result	% Rec.	% Rec. Limit	QC Batch #
LCS	TFT (mg/Kg)	50	0.1	5.22	104	72 - 128	QC00449
LCS	4-BFB (mg/Kg)	50	0.1	5.39	108	72 - 128	QC00449

	Param	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCSD	MTBE (mg/Kg)	<0.05	50	0.1	5.15	103	3	80 - 120	0 - 20	QC00449
LCSD	Benzene (mg/Kg)	<0.05	50	0.1	4.95	99	0	80 - 120	0 - 20	QC00449
LCSD	Toluene (mg/Kg)	<0.05	50	0.1	4.99	100	0	80 - 120	0 - 20	QC00449
LCSD	Ethylbenzene (mg/Kg)	<0.05	50	0.1	4.92	98	0	80 - 120	0 - 20	QC00449
LCSD	M,P,O-Xylene (mg/Kg)	<0.05	50	0.3	14.7	98	1	80 - 120	0 - 20	QC00449

Standard	Surrogate	Dil.	Spike Amount	Result	% Rec.	% Rec. Limit	QC Batch #
LCSD	TFT (mg/Kg)	50	0.1	5.04	101	72 - 128	QC00449
LCSD	4-BFB (mg/Kg)	50	0.1	5.27	105	72 - 128	QC00449

	Param	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCS	DRO (mg/Kg)	<50	1	250	259	104		70 - 130	0 - 20	QC00413
LCSD	DRO (mg/Kg)	<50	1	250	277	111	7	70 - 130	0 - 20	QC00413

	Param	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCS	GRO (mg/Kg)	<5	1	1	0.997	100		80 - 120	0 - 20	QC00450
LCSD	GRO (mg/Kg)	<5	1	1	0.978	98	2	80 - 120	0 - 20	QC00450

Report Date: 1/21/00 Order ID Number: A00011503 Page Number: 4 of 6
N/A Apache-Skelly N/A

Quality Control Report
Matrix Spike and Matrix Duplicate Spike

Standard	Param	Sample Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
MS	CL (mg/Kg)	3400	1	1250	4564.02	93		80 - 120	0 - 20	QC00445
MSD	CL (mg/Kg)	3400	1	1250	4584.90	95	2	80 - 120	0 - 20	QC00445

Standard	Param	Sample Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
MS	Benzene (mg/Kg)	<0.05	50	0.1	4.9	98		80 - 120	0 - 20	QC00449
MS	Toluene (mg/Kg)	<0.05	50	0.1	4.94	99		80 - 120	0 - 20	QC00449
MS	Ethylbenzene (mg/Kg)	<0.05	50	0.1	4.86	97		80 - 120	0 - 20	QC00449
MS	M,P,O-Xylene (mg/Kg)	<0.05	50	0.3	14.4	96		80 - 120	0 - 20	QC00449

Standard	Surrogate	Result	Dil.	Spike Amount	Analyst	% Rec.		% Rec. Limit	Prep Batch #	QC Batch #
MS	TFT (mg/Kg)	5.04	1	0.1	RC	101		72 - 128	PB00340	QC00449
MS	4-BFB (mg/Kg)	5.2	1	0.1	RC	104		72 - 128	PB00340	QC00449
MSD	Benzene (mg/Kg)	<0.05	50	0.1	4.7	94	4	80 - 120	0 - 20	QC00449
MSD	Toluene (mg/Kg)	<0.05	50	0.1	4.76	95	4	80 - 120	0 - 20	QC00449
MSD	Ethylbenzene (mg/Kg)	<0.05	50	0.1	4.65	93	4	80 - 120	0 - 20	QC00449
MSD	M,P,O-Xylene (mg/Kg)	<0.05	50	0.3	13.8	92	4	80 - 120	0 - 20	QC00449

Standard	Surrogate	Result	Dil.	Spike Amount	Analyst	% Rec.		% Rec. Limit	Prep Batch #	QC Batch #
MSD	TFT (mg/Kg)	5.06	1	0.1	RC	101		72 - 128	PB00340	QC00449
MSD	4-BFB (mg/Kg)	5.28	1	0.1	RC	106		72 - 128	PB00340	QC00449

Report Date: 1/21/00 Order ID Number: A00011503 Page Number: 3 of 6
N/A Apache-Skelly N/A

Quality Control Report
Method Blanks

Param	Flag	Blank Result	Reporting Limit	Date Analyzed	Prep Batch #	QC Batch #
Benzene (mg/Kg)		<0.05	0.05	1/19/00	PB00340	QC00449
Toluene (mg/Kg)		<0.05	0.05	1/19/00	PB00340	QC00449
Ethylbenzene (mg/Kg)		<0.05	0.05	1/19/00	PB00340	QC00449
M,P,O-Xylene (mg/Kg)		<0.05	0.05	1/19/00	PB00340	QC00449
Total BTEX (mg/Kg)		<0.05	0.05	1/19/00	PB00340	QC00449
Surrogate		Result	Spike Amount	% Rec.	% Rec. Limit	QC Batch #
TFT (mg/Kg)		5.34	0.1	107	72 - 128	QC00449
4-BFB (mg/Kg)		5.34	0.1	107	72 - 128	QC00449

Param	Flag	Blank Result	Reporting Limit	Date Analyzed	Prep Batch #	QC Batch #
Cl. (mg/Kg)		9.46	0.5	1/19/00	PB00338	QC00445

Param	Flag	Blank Result	Reporting Limit	Date Analyzed	Prep Batch #	QC Batch #
DRO (mg/Kg)		<50	50	1/17/00	PB00299	QC00413

Param	Flag	Blank Result	Reporting Limit	Date Analyzed	Prep Batch #	QC Batch #
GRO (mg/Kg)		<5	0.1	1/19/00	PB00341	QC00450

138794

Page____of____

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TraceAnalysis, Inc.

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El Paso, Texas 79922-1028
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1 (888) 588-3443

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

LAB Order ID # A00011503

Company Name: New Mexico Oil Conservation Division (OCD) Phone #: 505-393-6161 x...113

Address: (Street, City, Zip) 1625 N French Dr. Hobbs, NM 88240 Fax #: 505-393-0720

Contact Person: Donna Williams

Invoice to: (If different from above) OCD, Bill Olson

Project #: Project Name: Apache - Skelly

Project Location: Sampler Signature: Donna Williams

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME
138794	0114001330	1			X					X		01-14-00	13:30

ANALYSIS REQUEST (Circle or Specify Method No.)

MTBE 8021B/602	BTEX 8021B/602	TPH 418.1/TX1005	PAH 8270C	Total Metals Ag As Ba Cd Cr Pb Se Hg 6010B/200.7	TCLP Metals Ag As Ba Cd Cr Pb Se Hg	TCLP Volatiles	TCLP Semi Volatiles	TCLP Pesticides	RCI	GC-MS Vol. 8260B/624	GC/MS Semi. Vol. 8270C/625	PCB's 8082/608	Pesticides 8081A/608	BOD, TSS, pH	Turn Around Time if different from standard	Hold
	X	X												X Chlorides		

DRO / GRO

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Donna Williams	01-14-00	15:15			
Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received at Laboratory by:	Date:	Time:
				1/15/00	9:15

LAB USE ONLY
Intact (Y) N
Headspace Y (N)
Temp 1 °
Log-in Review

REMARKS:
FEDEX 1/21

Carrier # 8136 0669 5301

Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C.O.C.

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

April 11, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. P 288 259 104

Mr. Michael Bernard
Apache Corporation
2000 Post Oak Boulevard
Suite 100
Houston, Texas 77056-4400

Re: Assessment of the Vertical Hydrocarbon Impact at the Skelly Penrose "A" Central Battery Pit: (Abandoned emergency overflow pit)

Located: SE/4SE/4 Sec 4-Ts23s-R37e

Dear Mr. Bernard:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Apache Corporation's (AC) letter dated October 9, 1998 for the pit closure referenced above. **The NMOCD hereby approves of AC's proposed work plan for the spring of 1999, subject to the following conditions:**

1. After the additional excavation has taken place, AC shall take confirmation samples from the bottom of the excavation and sidewalls. Soil samples shall be analyzed for TPH, BTEX and Chlorides all per EPA SW-846 methods.

2. AC must seek NMOCD approval prior to the placement of any remediated soils. Please submit analytical results of the remediated soils to include TPH, BTEX and Chlorides.

3. AC will notify the OCD Santa Fe office and the OCD District office at least 48 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples. This event shall take place during NMOCD's normal working hours.

Please be advised that NMOCD approval of this work plan does not relieve AC of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve AC of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

Wayne Price

Wayne Price-Pet. Engr. Spec.
Environmental Bureau

cc: OCD Hobbs District Office-Spill files.