

1R - 426-214

## REPORTS

DATE:

9-10-13

# RICE *Operating Company*

122 West Taylor • Hobbs, New Mexico 88240  
Phone: (575) 393-9174 • Fax: (575) 397-1471

RECEIVED OGD

SEP 11 2013 1:43

CERTIFIED MAIL  
RETURN RECEIPT NO. 7007 2560 0003 0320 5433

September 10, 2013

Mr. Edward Hansen  
New Mexico Energy, Minerals, & Natural Resources  
Oil Conservation Division, Environmental Bureau  
1220 S. St. Francis Drive  
Santa Fe, New Mexico 87505

RE: CAP Report and Termination Request  
BD F-26 vent (1R426-214): Unit Letter F, Section 26, T21S, R37E  
RICE Operating Company – Blinebry Drinkard (BD) SWD System

Mr. Hansen:

Rice Operating Company (ROC) submits the following CAP Report and Termination Request for the BD F-26 vent site, located in Unit Letter F, Section 26, T21S, R37E in Lea County, New Mexico. See Figure 1 for site location. Rice Operating Company (ROC) is the service provider (agent) for the BD Saltwater Disposal (SWD) System and has no ownership of any portion of the pipeline, well, or facility. The System is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

## **Background**

As part of the ROC Junction Box Upgrade Work plan, starting on January 22, 2008, the junction box was eliminated during the pipeline replacement/upgrade program. The former junction box site was excavated to dimensions of 30 feet by 15 feet by 12 feet deep with a backhoe. PID readings and chloride field tests were conducted at regular intervals. Based on the field PID readings, TPH did not exhibit a decrease with depth. Chloride concentrations increased with depth and ranged from 1,431 milligrams per kilograms (mg/kg) at 4 feet below ground surface (bgs) to 3,149 mg/kg at 12 feet bgs. A four point composite sample for the walls was collected and submitted for analysis of TPH and chlorides. Analytical results showed a GRO reading of non-detect and a DRO reading of 963 mg/kg with a chloride concentration of 768 mg/kg. A five point bottom composite sample was collected and submitted for analysis of BTEX, TPH, and chlorides. Analytical results showed a benzene concentration of <0.020 mg/kg, a toluene concentration of 0.126, an ethyl benzene concentration of 0.706, and a total xylenes concentration of 2.17. The GRO reading was 43.9 and the DRO reading was 764 with a chloride concentration of 368 mg/kg.

Upon completion of the excavation, the soils were blended and placed back into the excavation. Laboratory analysis of the blended backfill sample resulted in a GRO reading of 12.9 mg/kg, DRO reading of 872 mg/kg, and a chloride concentration of 784 mg/kg. The excavation was then

brought up to surface grade. On February 1, 2008, the site was seeded with a blend of native vegetation. On August 18, 2008, an email was submitted to the NMOCD informing of a potential groundwater impact to the site. In March 2009, ROC submitted a Junction Box Disclosure Report to the NMOCD with all the 2008 junction box closure and disclosure reports.

On October 1, 2009, ROC submitted the ICP, and in an email dated January 28, 2010, the NMOCD approved the ICP.

On March 22, 2010, ROC was onsite to oversee the installation of three soil borings (SB-1 through SB-3) within and around the former junction box location. Soil samples were collected every 5 feet beginning at a depth of 15 feet below ground surface (bgs). Samples were collected from cuttings and were field screened for TPH utilizing a photo-ionization detector (PID) and for chlorides with a field sampling kit. Field results indicate the soil chloride concentrations decrease with depth in SB-1 to a concentration of 16 mg/kg at 40 ft. bgs. TPH concentrations in SB-1 also decreased with depth with a GRO concentration below detectable limit and a DRO concentration of 17.7 mg/kg at 40 ft. bgs. TPH concentrations were below detectable limits in SB-2 and SB-3. Soil chloride concentrations in SB-3 remained low with depth with all samples being less than 240 mg/kg. Elevated soil chloride concentrations were observed in SB-2.

In order to determine if groundwater was impacted from the former junction box, one monitor well was installed (MW-1) to the southeast of the excavated junction box to a depth of 57 feet bgs on March 23, 2010. On November 18, 2010, an up gradient monitor well (MW-2) was installed northwest of the existing tank battery. Groundwater was encountered at approximately 45 feet bgs. Upon completion, the monitor wells were developed and samples were submitted to Cardinal Labs of Hobbs, New Mexico for analysis of chlorides utilizing EPA standard 4500Cl-B and BTEX utilizing EPA method 8021B. Initial results showed a chloride concentration of 1,060 mg/L in MW-1 on April 20, 2010, and 1,300 mg/L in MW-2 on December 3, 2010. This proves that a non-ROC, up-gradient site is contributing to the degradation of groundwater quality. Chloride concentrations in MW-1 have since averaged 1,519 mg/L and MW-2 has averaged 1,224 mg/L. No BTEX was detected in either of the two monitoring wells. This suggests the chloride impacted groundwater is now moving across the F-26 vent site.

On April 18, 2013, ROC submitted a report entitled; ICP Report and Corrective Action Plan (CAP), to the NMOCD and an Addendum was submitted on May 8, 2013. According to the CAP and Addendum, ROC would excavate a 43 foot by 30 foot area, with the northeast corner cut off to remain a safe distance from an underground electrical line, to a depth of approximately 4 to 5 feet bgs, and install a 20 mil reinforced polyethylene liner. The report also proposed removing a chloride mass of 415 kilograms (kg) from the existing recovery systems located at BD O-23 vent and BD O-23-1 vent. The CAP and Addendum were approved by the NMOCD on May 8, 2013.

#### **Chloride Mass Removal**

Groundwater recovery efforts began on May 9, 2013, from BD O-23 vent and BD O-23-1 vent. Approximately 310 barrels of chloride impacted groundwater were removed from BD O-23 vent. With a chloride concentration of 10,700 mg/L, this equates to 527 kg of chloride. Approximately 431 barrels of chloride impacted groundwater were removed from BD O-23-1 vent. With a chloride concentration 3,900 mg/L, this equates to 267 kg of chloride. Together, the two recovery systems removed 794 kg of chloride. The removed groundwater was utilized for pipeline and well maintenance. The groundwater withdrawal sheet and lab results for O-23 vent and O-23-1 vent are included in Appendix A.

**Liner Installation**

Beginning on July 1, 2013, RECS personnel were on site to begin the excavation for the 20-mil reinforced polyethylene liner installation. The site was excavated to 43 ft x 30 ft, as shown on the attached Figure 2, to a depth of 5 ft. A total of 276 yards of excavated soil was taken to a NMOCD approved facility for disposal, and a total of 228 yards of clean soil were imported to serve as pad and backfill material. The imported blow sand was used to pad the bottom of the excavation to protect the liner from punctures. The liner was installed and properly seated into the excavation at approximately 4.5 ft bgs. The remainder of the blow sand was used to pad above the liner and to backfill the excavation. A sample of the imported soil was field tested for hydrocarbons and returned a result of 74.4 ppm. The sample was then taken to a commercial laboratory for analysis of chlorides, which returned a result below detectable limit. The excavation was backfilled to ground surface and contoured to the surrounding area.

Silt net fencing was placed around the backfilled area to provide protection from wind erosion and maintain seed integrity. On July 11 and 12, 2013, the site was disked and soil amendments were added to the top soil portions of the site. The site was seeded with a blend of native vegetation and is beginning to recover. The lab result, PID sheet, revegetation form, and photo documentation are included in Appendix B.

Based on the completion activities performed at the site, ROC acknowledges they have met the requirements of 19.15.29 NMAC for this project. Upon NMOCD approval, monitor well MW-1 will be plugged using a cement grout with 1 to 3% bentonite and a 3-foot cap of cement to the surface. MW-2 will remain open to monitor up-gradient groundwater quality. Upon completion of these activities, a Monitor Well Plugging Report will be submitted to the NMOCD.

Please contact me at (575) 631-6432 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,  
RICE Operating Company



Hack Conder  
Environmental Manager

enclosures



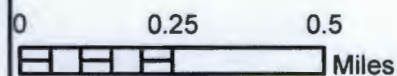
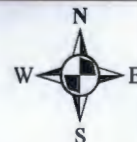


## ***BD F-26 vent***

U/ N, Section 20, T21S, R37E  
LEA COUNTY, NM

NMOCD Case #: 1R426-214

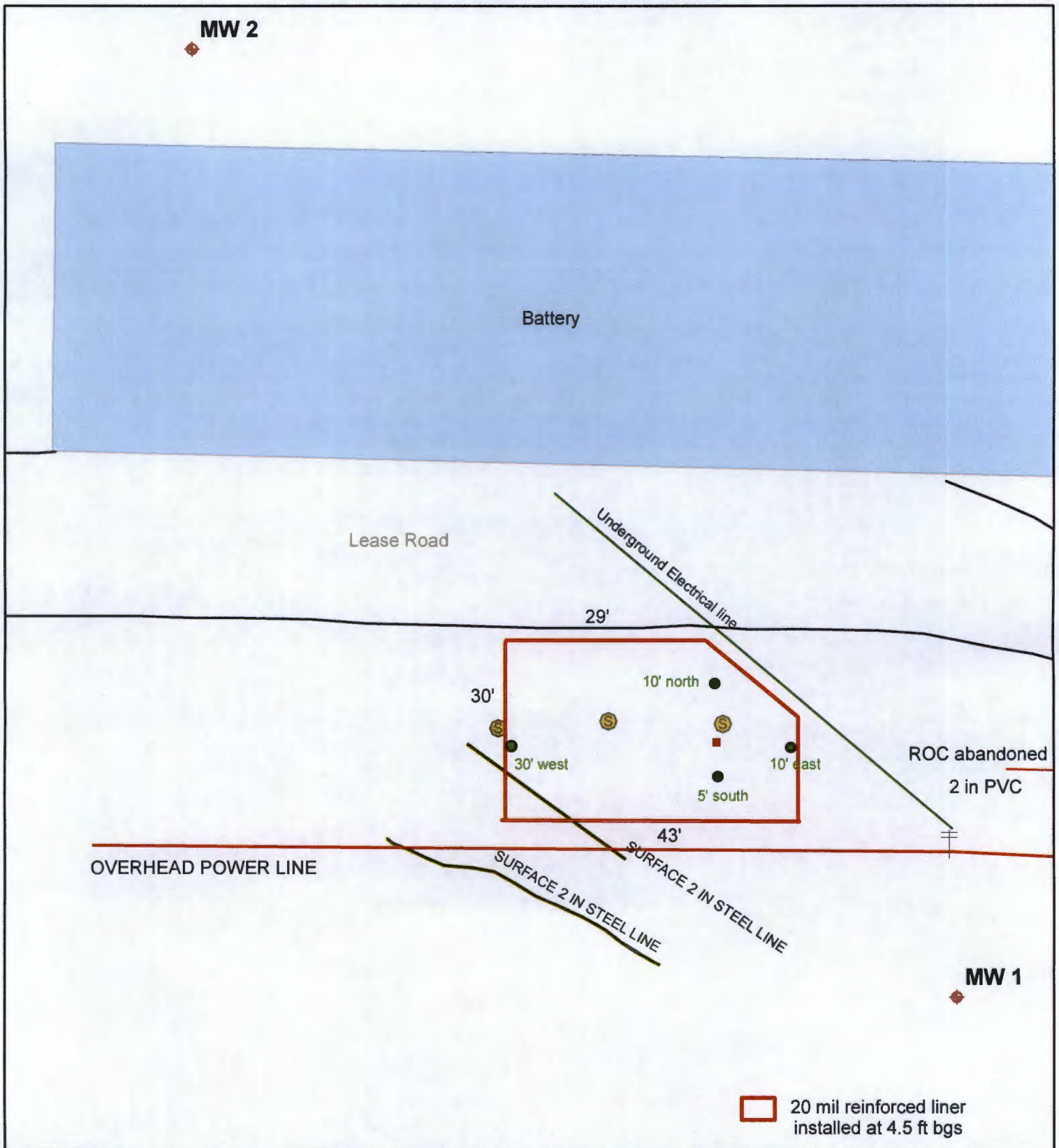
### **Figure 1**



Drawing date: 8/1/13  
Drafted by: L. Weinheimer



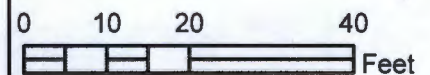
# NMOCD Approved Liner



***BD F-26 vent***

Legals: UL/F sec. 26  
T21S R37E  
NMOCD Case #: 1R426-214

**Figure 2**



GPS Date: 6-25-2013 TG  
Drawing date: 9-5-13  
Drafted by: T. Grieco

## **APPENDIX A**

**Record of Groundwater Withdrawal from BD O-23, O-23-1 Recovery Systems**  
**Site Name: BD F-26 vent (1R426-214)**

Date	Fluid Hauled (bbls)	Lab Chloride Conc (ppm)	Remarks
5/6/2013			Started pumping
5/9/2013	50		
5/13/2013		10,700	RW-2 (O-23 vent)
5/17/2013	130		
5/20/2013	130		
<hr/>			
Total for May	310	bbls	527 kg
	10080	gallons	

Date	Fluid Hauled (bbls)	Lab Chloride Conc (ppm)	Remarks
5/6/2013			
5/9/2013	100		
5/13/2013	130	3900	MW-1R (O-23-1 vent)
5/16/2013	130		
5/24/2013	71		
<hr/>			
Total for May	431	bbls	267 kg
	18102	gallons	

**Total Chloride Removed** **794 kg**



May 14, 2013

Hack Conder  
Rice Operating Company  
112 W. Taylor  
Hobbs, NM 88240

RE: BD O-23 VENT

Enclosed are the results of analyses for samples received by the laboratory on 05/13/13 16:06.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

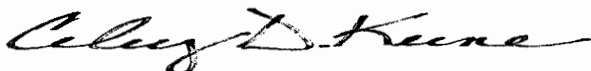
Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Celey D. Keene  
Lab Director/Quality Manager

**Analytical Results For:**

Rice Operating Company  
Hack Conder  
112 W. Taylor  
Hobbs NM, 88240  
Fax To: (575) 397-1471

Received: 05/13/2013  
Reported: 05/14/2013  
Project Name: BD O-23 VENT  
Project Number: NONE GIVEN  
Project Location: T21S R37E SEC23 O-LEA CTY., NM

Sampling Date: 05/13/2013  
Sampling Type: Water  
Sampling Condition: \*\* (See Notes)  
Sample Received By: Jodi Henson

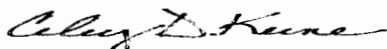
**Sample ID: RECOVERY WELL 2 (H301140-01)****Chloride, SM4500Cl-B****mg/L****Analyzed By: DW**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride*</b>	<b>10700</b>	4.00	05/14/2013	ND	104	104	100	3.77	

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

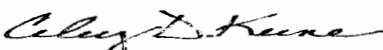
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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Celey D. Keene, Lab Director/Quality Manager



## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

May 14, 2013

Hack Conder  
Rice Operating Company  
112 W. Taylor  
Hobbs, NM 88240

RE: BD O-23-1

Enclosed are the results of analyses for samples received by the laboratory on 05/13/13 16:06.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

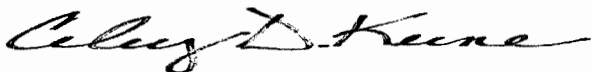
Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

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Sincerely,



Celey D. Keene  
Lab Director/Quality Manager



**Analytical Results For:**

Rice Operating Company  
Hack Conder  
112 W. Taylor  
Hobbs NM, 88240  
Fax To: (575) 397-1471

Received: 05/13/2013  
Reported: 05/14/2013  
Project Name: BD O-23-1  
Project Number: NOT GIVEN  
Project Location: T21S R37E SEC23 O-LEA CTY., NM

Sampling Date: 05/13/2013  
Sampling Type: Water  
Sampling Condition: \*\* (See Notes)  
Sample Received By: Jodi Henson

**Sample ID: MW 1-R (H301141-01)**

Chloride, SM4500Cl-B		mg/L		Analyzed By: DW					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride*	3900	4.00	05/14/2013	ND	104	104	100	3.77	

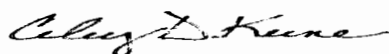
**Sample ID: RW-2 (H301141-02)**

Chloride, SM4500Cl-B		mg/L		Analyzed By: DW					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride*	4900	4.00	05/14/2013	ND	104	104	100	3.77	

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Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

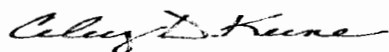
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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Celey D. Keene, Lab Director/Quality Manager



# **CARDINAL LABORATORIES**

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603  
(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

## **CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

Page 4 of 4

Company Name: <b>Rice</b>				<b>BILL TO</b>												<b>ANALYSIS REQUEST</b>											
Project Manager: Hack Conder				P.O. #:				<div>Chlorides</div> <div>TPH 8015 M</div> <div>BTEX</div> <div>Texas TPH</div> <div>Complete Cations/Anions</div> <div>TDS</div>																			
Address:				Company:																							
City: Hobbs State: NM Zip: 88240				Attn:																							
Phone #: Fax #:				Address:																							
Project #: Project Owner:				City:																							
Project Name:				State: Zip:																							
Project Location: <b>B00-23-1</b>				Phone #: Fax #:																							
Sampler Name: Kyle Norman																											
FOR LAB USE ONLY						MATRIX		PRESERV.		SAMPLING																	
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL	OTHER:	DATE	TIME													
H301141																											
1	MW-1R	G	1	✓									5-13-13	11:15	✓												
2	RW-2	G	1	✓									11	11:25	✓												

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Relinquished By:	Date:	Received By:	Phone Result:	Yes	No	Add'l Phone #:
<i>Kyle Norman</i>	5-13-13	<i>Jodi Benson</i>	Fax Result:	Yes	No	Add'l Fax #:
Relinquished By:	Date:	Received By:	REMARKS:			
	Time:		email results: zconder@rice-ecs.com			
Delivered By: (Circle One)			Knorman@rice-ecs.com; lpena@riceswd.com			
Sampler - UPS - Bus - Other:			Kjones@riceswd.com; Bbaker@rice-ecs.com;			
Sample Condition			CHECKED BY:			
Cool Intact			(Initials)			
Yes Yes			<i>[Signature]</i>			
No No						

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

#54

## **APPENDIX B**

July 18, 2013

KATIE JONES

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: F-26 VENT (21S/37E) MP

Enclosed are the results of analyses for samples received by the laboratory on 07/15/13 13:20.

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This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Mike Snyder

Organic Supervisor



**Analytical Results For:**

Rice Operating Company  
KATIE JONES  
112 W. Taylor  
Hobbs NM, 88240  
Fax To: (575) 397-1471

Received: 07/15/2013  
Reported: 07/18/2013  
Project Name: F-26 VENT (21S/37E) MP  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 07/10/2013  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

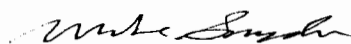
**Sample ID: IMPORT SOIL (H301649-01)****Chloride, SM4500Cl-B****mg/kg****Analyzed By: AP**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	07/17/2013	ND	416	104	400	3.92	

Cardinal Laboratories

\*=Accredited Analyte

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Mike Snyder, Organic Supervisor

**Notes and Definitions**

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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---

Mike Snyder, Organic Supervisor



## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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Relinquished By: <b>KARANJA LEWIS</b>		Date: <b>7-15-13</b>	Received By: <b>Jodi Henson</b>	Phone Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Phone #:
Relinquished By:		Time: <b>1:20</b>		Fax Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Fax #:
Relinquished By:		Date:	Received By:	REMARKS:	
Relinquished By:		Time:		email results <b>k.lewis@rice-ecs.com</b>	
Delivered By: (Circle One)		Sample Condition	CHECKED BY:	knorman@rice-ecs.com hconder@rice-ecs.com;	
Sampler - UPS - Bus - Other:		Cool <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Lweinheimer@rice-ecs.com; kjones@riceswd.com;	
			<b>[Signature]</b>	Lpena@riceswd.com	

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2976

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# RICE ENVIRONMENTAL CONSULTING & SAFETY

122 West Taylor Hobbs, NM 88240  
PHONE: (505) 393-9174 FAX: (505) 397-1471  
PID METER CALIBRATION & FIELD REPORT FORM

CK.	<input checked="" type="checkbox"/>	MODEL: PGM 7300	SERIAL NO: 590-000508
MODEL	<input type="checkbox"/>	MODEL: PGM 7300	SERIAL NO: 590-000504
NO.	<input type="checkbox"/>	MODEL: PGM 7320	SERIAL NO: 592-903318
	<input type="checkbox"/>	MODEL: PGM _____	SERIAL NO: _____ 590-902690

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

IAM-248-100-6	EXPIRATION DATE: 8-15-2016
METER READING ACCURACY: 100.2	

ACCURACY : +/- 2%

COMPANY
RICE Operating

SITE	UNIT	SECTION	TOWN SHIP	RANGE
BD F-26 vent	F	26	21S	37E

SAMPLE ID	PID	SAMPLE ID	PID
IMPORT SOIL	74.4		

I verify that I have calibrated the above instrument in accordance to the manufacture operation manual.

SIGNATURE

*Karanga Lewis*

DATE: 7-10-13



PO Box 5630  
Hobbs, NM 88241  
Phone: (575) 393-4411  
Fax: (575) 393-0293

## REVEGETATION FORM

### 1. General Information

Site name: BD F-26 vent						
U/L F	Section 26	Township 21S	Range 37E	County Lea	Latitude 32*27.173' N	Longitude 103*08.243' W
Contact Name: Hack Conder						
Email: hconder@riceswd.com						
Site size:		2500 square feet		Map detail of site attached <input type="checkbox"/>		
Additional information:						

### 2. Soils

*\*Do not rip caliche subsoils: caliche rocks brought to the surface by ripping shall be removed.*

Salvaged from site <input type="checkbox"/>	Bioremediated <input type="checkbox"/>	Imported <input checked="" type="checkbox"/>	Blended <input type="checkbox"/>	Depth (in):
Texture: Sand	Describe soil & subsoil: Blowsand			
Soil prep methods:	Rip <input type="checkbox"/>	Depth(in):	Disc <input checked="" type="checkbox"/>	Depth (in): 3 in
Rollerpack <input type="checkbox"/>				
Date completed: 7 / 11 / 2013				

### 3. Bioremediation

Fertilizer <input type="checkbox"/>	Hay <input type="checkbox"/>	Other <input checked="" type="checkbox"/>
Type:		Describe: 1 bag of manure. 10 bags of potting soil. 5 bags of Restor Nhance
Lbs/acre:		

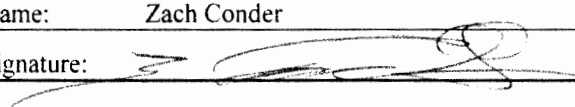
### 4. Seeding

*\*Attach seed bag tags to this form. Seed bag tags shall contain the site name and S-T-R.*

Custom seed mix <input checked="" type="checkbox"/>	Prescribed mix <input type="checkbox"/>	Seed mix name: 10 lbs. Race horse oats, 5 lbs. Blue grama, 5 lbs. side oats.	Seeding date: 7 / 12 / 2013
Broadcast <input type="checkbox"/>			
Method: Used mechanical seeder			
Soil conditions during seeding: Dry <input checked="" type="checkbox"/> Damp <input type="checkbox"/> Wet <input type="checkbox"/>			
Photos attached <input type="checkbox"/>	Observations: Seed was tilled into the soil		
Number of photos:			

### 5. Certification

I hereby certify that the information in this form and attachments is true and complete to the best of my knowledge and belief.

Name: Zach Conder	Title: Environmental Tech	Date: 8-15-13
Signature: 		



**BD F-26 vent (1R426-214)**  
**Unit Letter F, Section 26, T21S, R37E**



Site prior to excavation,  
facing north 6/17/2013



Excavating,  
Facing southeast 7/2/2013



Exporting soil,  
facing west 7/2/2013



Excavation final,  
facing northwest 7/9/2013



Installing 6" bottom sand pad,  
facing northeast 7/9/2013



Installing liner,  
Facing south 7/9/2013

**BD F-26 vent (1R426-214)**  
**Unit Letter F, Section 26, T21S, R37E**



Padding liner with blowsand,  
Facing northwest

7/9/2013



Backfilling excavation,  
Facing south

7/10/2013



Final complete,  
facing east

7/11/2013



Spreading seed,  
facing northwest

7/12/2013



Tilling seed,  
facing northwest

7/12/2013



Site complete with vegetation,  
facing north

8/9/2013