

1R - 426-153

**REPORTS**

**DATE:**

9-4-12

RECEIVED OCD  
2012 SEP -6 P 12:40

ARCADIS U.S., Inc.  
1004 North Big Spring Street  
Suite 300  
Midland  
Texas 79701  
Tel 432.687.5400  
Fax 432.687.5401  
[www.arcadis-us.com](http://www.arcadis-us.com)

Sent Certified Mail  
Return Receipt No. 7002 2410 0001 5813 4026

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

Environmental

Subject:

**Excavation Summary and Soil Closure Request  
Blinebry-Drinkard (BD) N-32 vent  
Unit N, SEC. 32, T21S, R37E, Eunice, Lea County, New Mexico  
NMOCD CASE # 1R426-153**

Date:  
September 4, 2012

Contact:  
Sharon Hall

Mr. Hansen:

Phone:  
432.687.5400

RICE Operating Company (ROC) has retained ARCADIS U.S., Inc. (ARCADIS) to address potential environmental concerns at the above-referenced site. ROC is the service provider (agent) for the Blinebry-Drinkard (BD) 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. Environmental projects of this magnitude require System Party AFE approval and work begins as funds are received.

Email:  
[sharon.hall@arcadis-us.com](mailto:sharon.hall@arcadis-us.com)

Our ref:  
MT001015.0001

On behalf of ROC, ARCADIS respectfully submits this Excavation Summary and Soil Closure Request for the above-referenced site.

ARCADIS U.S., Inc.  
TX Engineering License # F-533

## **SITE HISTORY AND BACKGROUND**

The site is located west of the town of Eunice, New Mexico. Elevated chlorides in this area have been reported since early 1952 (*Geology and ground-water conditions in southern Lea County, New Mexico* [Groundwater Report 6 by A. Nicholson, Jr. and A. Clebsch, Jr.; United States Geological Society]). The depth to groundwater at this site is approximately 98 feet below ground surface (bgs).

The junction was eliminated and replaced with a new junction box located 80 feet northeast of the former junction box location. Initial delineation began in August 2007

and was completed on November 2, 2007. A backhoe was used to collect soil samples five, ten and fifteen feet north, south, east and west of the junction box locations at one foot intervals to a depth of 12 ft bgs. Soil samples were analyzed in the field for chlorides using field-adapted Method 9253 and screened in the field using a photoionization detector (PID).

A backhoe was used to excavate soils from an excavation around the former junction box measuring 30 feet by 30 feet by 12 feet deep. A four-point wall composite sample was collected from each of the four walls and five-point composite sample was collected from the bottom of the excavation and submitted to Cardinal Laboratories for gasoline range organics (GRO) and diesel range organics (DRO) and chloride analysis. Some elevated PID readings were observed near the source. DRO was detected at a concentration of 57.8 milligrams per kilogram (mg/kg) in the four-point wall composite sample and at a concentration of 36 mg/kg in the five-point bottom composite sample. GRO was not detected.

Based on the results of the soil sampling analytical results, elevated chloride concentrations are present at the subject site.

The excavated soils were blended on-site and returned to the excavation to a depth six feet below grade. A six-foot deep shelf extending five-feet from the north, south and west walls and ten-feet from the east wall was excavated to prepare the excavation for a clay barrier. A 40 x 45x 1-foot thick clay barrier was installed at a depth of five to six feet bgs. The clay layer was compacted to a dry density of 93.4% and 14% moisture. The remaining fill was used to backfill the excavation to ground surface and to contour the surrounding area. An identification plate was placed on the surface at the location of the former junction box to mark the presence of the clay liner.

A sample of the blended backfill material was submitted to Cardinal Laboratories for GRO, DRO and chloride analysis. DRO was detected at a concentration of 517 mg/kg and chlorides were detected at a concentration of 1,090 mg/kg.

To further investigate the depth of chloride impacts a soil boring (SB-1) was drilled to a depth of 90 feet bgs at a location five-feet north of the former junction box. Soil samples were collected every five-feet and analyzed in the field for chlorides using field-adapted Method 9253 and screened in the field using a PID. One sample, collected from a depth of 90 feet bgs was submitted to Cardinal Laboratories and

analyzed for chlorides. Laboratory analysis confirmed the presence of an elevated chloride concentration (1,296 mg/kg) at a depth of 90 feet bgs.

ROC disclosed potential groundwater impact at the site to New Mexico Oil Conservation Division (NMOCD) via e-mail on December 6, 2007. A disclosure report was submitted to NMOCD with all of the ROC 2007 Junction Box Reports in March 2008 per the ROC Junction Box Upgrade Work plan.

On behalf of ROC, ARCADIS submitted an ICP to NMOCD on May 21, 2008.

The proposed ICP was approved by NMOCD on May 28, 2008. On June 2, 2008, NMOCD was informed by email that an electromagnetic (EM) survey would be performed at this site to assist on placement of the proposed monitoring well and soil borings. On July 30, 2008 ARCADIS emailed NMOCD the results of the EM survey and informed NMOCD that there were no proposed changes to the approved monitoring well and soil boring locations as a result of the EM survey.

### **ICP INVESTIGATION RESULTS**

Four soil borings (SB 2 through SB 5) and one monitoring well were drilled at the site on October 6 and 7, 2008. The soil borings were each drilled to a depth of 80 feet and the monitoring well was drilled to a depth of 100 feet. Soil samples were collected every five-feet and analyzed in the field for chlorides using field-adapted Method 4500-Cl-B and screened in the field using a PID. Two samples from each boring were submitted to Cardinal Laboratories and analyzed for chlorides. Laboratory and field analysis confirm that elevated chloride concentrations are present in soils at the site.

One upgradient (MW-3) and one downgradient (MW-2) monitoring well was installed at the site to assess groundwater quality. The monitor wells were drilled on July 9, 2009. Two additional monitoring wells, one upgradient (MW-4) and one downgradient (MW-5) of the wells drilled in July, were drilled on September 21 and 22, 2009. These wells were installed to further assess regional groundwater conditions in order to evaluate a groundwater remedy.

The laboratory analytical results from groundwater samples collected from MW-3 confirm that elevated chlorides are present in groundwater upgradient of the site. Based on the fact that elevated chloride concentrations in groundwater have been reported in the area since the early 1950s and that elevated chloride concentrations

occur in the monitoring well upgradient of the site we propose a chloride mass estimation and removal plan.

### **CORRECTIVE ACTION PLAN (CAP)**

A Corrective Action Plan (CAP) was submitted to the NMOCD on January 10, 2012 and was approved on March 26, 2012. The CAP proposed the following:

A modified 75 ft x 90 ft, 20-mil, reinforced liner would be installed at approximately 25 ft bgs with the northwest corner angled. Backfill soil would not exceed a chloride concentration of 500 mg/kg or PID reading of 100 ppm and the site would be seeded with native grasses. The CAP also proposed a groundwater recovery system being installed at the former junction box location and 1,523 kg of chloride would be removed from groundwater. NMOCD's March 26, 2012, approval of the CAP required that an additional 30% chloride mass be removed for a total chloride mass of 1,980 kg. Recovered groundwater would be utilized for pipeline and well maintenance or landowner usage (cow trough). The chloride mass is based on the difference between the average concentration of the near-source well (MW-1) and the up-gradient well (MW-3). In light of the fact that an infiltration barrier is proposed, an exposure assessment was run for this site using the United States Environmental Protection Agency Exposure Assessment Multimedia Model (MULTIMED Version 1.01, June 1991). The model output concludes that the peak increased concentration of chlorides in groundwater contributed by soils in the vadose zone would be 6.3 mg/L in 200 years. Since the estimated increase in chloride concentrations in groundwater would not result in a groundwater background concentration exceedance, vadose zone chloride mass removal estimates are not warranted for this site.

### **LINER INSTALLATION**

Beginning May 18, 2012, the site was excavated to dimensions of 75 ft x 90 ft x 25 ft bgs. Approximately 6,680 yards of the excavated soil was disposed of at a NMOCD approved facility. Soil was scraped from the surface of the site location to use as a sand pad below and above the liner to protect it from punctures. The blowsand was field tested with a PID meter and returned a result of 0.1 ppm. The sample was then sent to a commercial laboratory for analysis of chloride, which resulted in a concentration of 32 mg/kg. The excavation was padded with six inches of the blowsand and the 20-mil reinforced poly liner was installed and properly seated in the bottom of the excavation on July 2, 2012. Clean soil was imported and used to pad

six inches above the liner and to backfill the excavation up to 20 ft bgs. The imported topsoil was field tested with a PID meter, resulting in a concentration 0.3 ppm. The sample was then sent to a commercial laboratory for analysis of chloride, resulting in a chloride concentration below detectable limits (<16 mg/kg). The excavation was backfilled with caliche from 20 ft bgs to 5 ft bgs. The remaining 5 ft of the excavation was backfilled with imported topsoil. A sample was sent to a commercial laboratory for analysis of chlorides, yielding a chloride concentration below detectable limits (<16 mg/kg). The area was contoured to the surrounding area and seeded with a blend of native vegetative and is expected to return to a normal vegetative capacity. Silt net fencing was installed around the excavation to help keep the seed in place. Photo documentation and laboratory analysis of these activities are attached.

The corrective actions for the vadose zone are complete, and ROC respectfully request 'soil closure' or similar closure status. ROC is now in the process of setting up a recovery system and will begin recovering groundwater by December 2012. Once the chloride mass is removed, a final CAP Report will be submitted to the NMOCD with a termination request of the regulatory file.

Thank you for your consideration concerning this Excavation Summary and Soil Closure Request. If you have any questions, do not hesitate to contact Hack Conder or me.

Sincerely,

ARCADIS U.S., Inc.

*Sharon E. Hall*

Sharon E. Hall  
Associate Vice President

Copies:  
Hack Conder, ROC

Attachments:

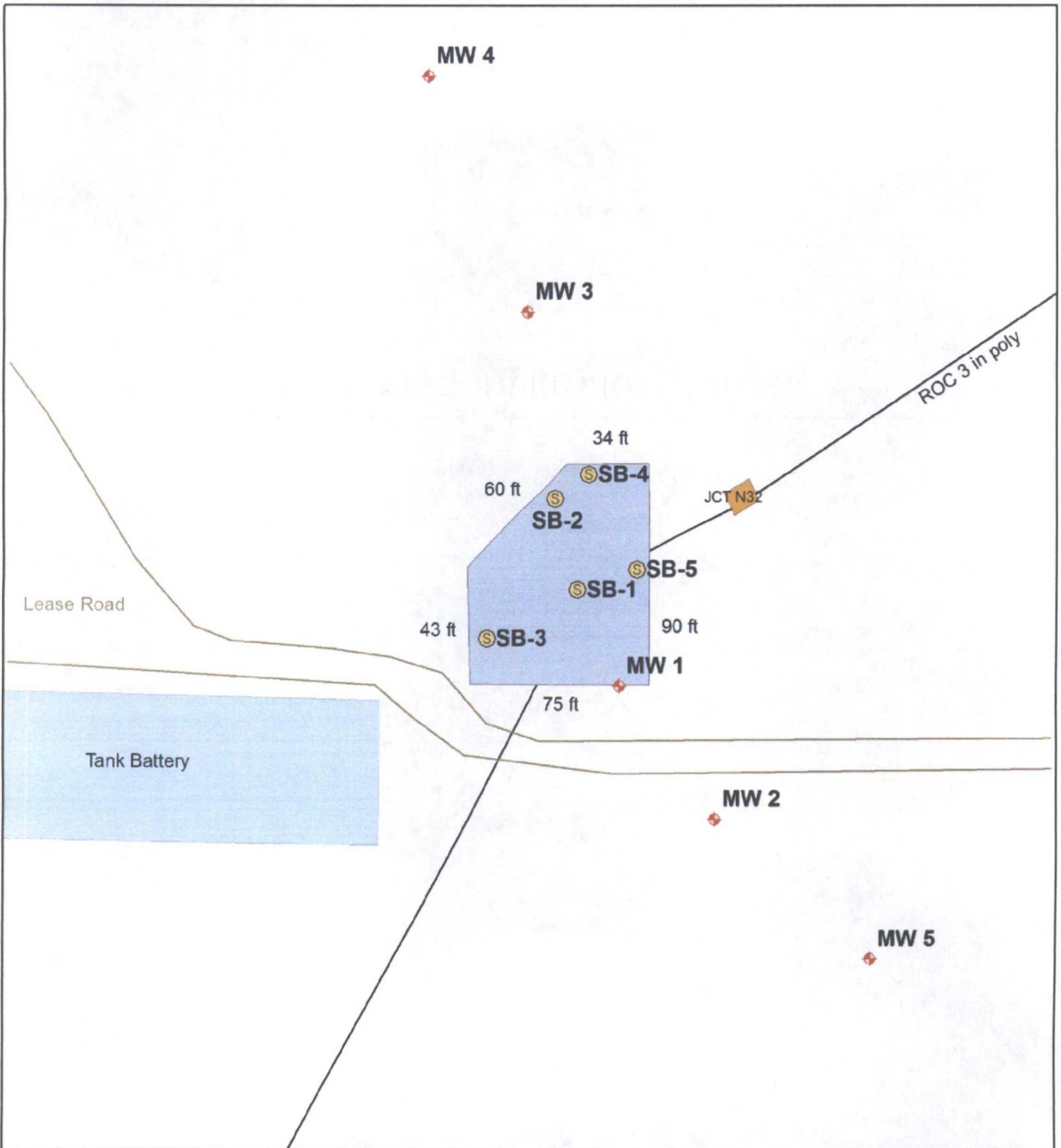
Installed Infiltration Barrier Figure

**ARCADIS**

Mr. Ed Hansen  
September 4, 2012

Liner Installation Photos  
Laboratory Analyses  
PID Forms  
Revegetation Form

# Installed Infiltration Barrier



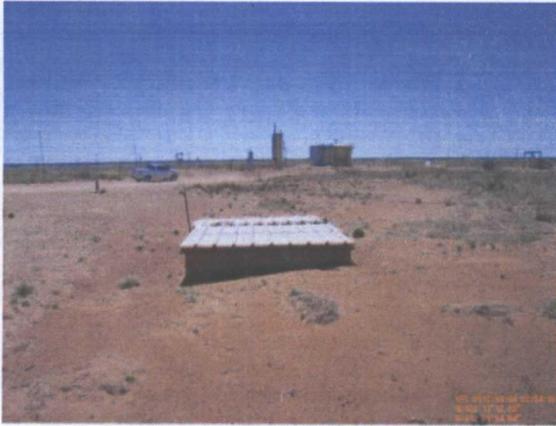
***BD N-32 vent***

Legals: UL/N sec. 32  
 T21S R37E  
 NMOCD Case #: 1R426-153

0 25 50 100 Feet

Drawing date: 8/30/12  
 Drafted by: L. Weinheimer

BD N-32 Vent (1R426-153)  
Unit Letter N, Section 32, T21S, R37E



Site prior to excavation, facing southwest  
4/4/2012



Excavating site, facing northeast 6/5/2012



Exporting soil, facing east 6/8/2012



Installing 6" bottom sand pad, facing west  
7/2/2012



Installing 75' x 90' 20-mil reinforced liner  
at 25' bgs, facing west 7/2/2012



Installing 6" sand pad above liner, facing  
north 7/2/2012



Backfilling with imported topsoil, facing east  
7/5/2012



Backfilling with caliche, facing south  
7/9/2012



Installing topsoil above caliche, facing southwest  
7/13/2012



Silt net fence installed, facing north  
7/30/2012



Tilling and seeding, facing east  
8/17/2012



Site complete, facing southwest  
8/17/2012

July 03, 2012

Hack Conder

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: BD N-32-VENT

Enclosed are the results of analyses for samples received by the laboratory on 07/02/12 16:36.

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).

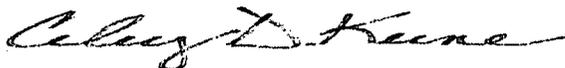
Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

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:	07/02/2012	Sampling Date:	07/02/2012
Reported:	07/03/2012	Sampling Type:	Soil
Project Name:	BD N-32-VENT	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	T21S R37E SEC32 N - LEA CTY., NM		

**Sample ID: BD N-32 VENT BLOWSAND (H201496-01)**

Chloride, SM4500Cl-B	mg/kg		Analyzed By: HM							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	07/03/2012	ND	416	104	400	0.00		

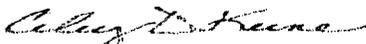
**Sample ID: SIMS PIT TOP SOIL (H201496-02)**

Chloride, SM4500Cl-B	mg/kg		Analyzed By: HM							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	07/03/2012	ND	416	104	400	0.00		

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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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

101 East Marland, Hobbs, NM 88240  
(575) 393-2326 FAX (575) 393-2476

Company Name: <b>RICE</b>		<b>BILL TO</b>		<b>ANALYSIS REQUEST</b>																	
Project Manager:		P.O. #:																			
Address:		Company:																			
City: State: Zip:		Attn:																			
Phone #: Fax #:		Address:																			
Project #: Project Owner:		City:																			
Project Name:		State: Zip:																			
Project Location: <b>BDN-32 vent major project</b>		Phone #:																			
Sampler Name:		Fax #:																			
FOR LAB USE ONLY																					
Lab I.D.	Sample I.D.	CONTAINERS	MATRIX	PRESERV	SAMPLING																
		GROUNDWATER	WASTEWATER	SOIL	SLUDGE	OTHER	ACID/BASE	ICE / COOL	OTHER	DATE	TIME										
<b>H2D1496</b>																					
	1. BDN-32 vent blow sand									7/2/12	1:40										
	2. Sims P.T. top soil									7/2/12	1:45										

PLEASE NOTE: Facility and Customer Cardinal is solely responsible for the accuracy of the data entered on this form. Cardinal is not liable for errors in data entered by the client for the analysis. All data, including those for inorganic and any other analytes, shall be secured against loss and received by Cardinal within 10 days after completion of the applicable analysis. In the event that Cardinal is liable for the loss of or destruction of samples, including without limitation, this must be in writing and received by client, its subcontractor, affiliate or representative, within 90 days of the date of the loss or destruction of samples. No liability shall be assumed by Cardinal for any loss of samples or data resulting from any of the above stated requirements or otherwise.

Relinquished By: <i>[Signature]</i>	Date: 7/2/12	Received By: <i>[Signature]</i>	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
Relinquished By: <i>[Signature]</i>	Time: 4:36	Received By: <i>[Signature]</i>	Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Delivered By: (Circle One)	Sample Condition	CHECKED BY: <i>[Signature]</i>	REMARKS: <i>Rush</i> <i>Bruce Baker</i>	
Sampler - UPS - Bus - Other:	Cool <input type="checkbox"/> Intact <input type="checkbox"/>		<i>Huck Comber</i> <i>Lara W.</i>	
	Yes <input type="checkbox"/> No <input type="checkbox"/>		<i>Zack Comber</i>	

† Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326



July 23, 2012

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

RE: BD N-32-VENT

Enclosed are the results of analyses for samples received by the laboratory on 07/13/12 16:35.

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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:	07/13/2012	Sampling Date:	07/13/2012
Reported:	07/23/2012	Sampling Type:	Soil
Project Name:	BD N-32-VENT	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	T21S R37E SEC32 N - LEA CTY., NM		

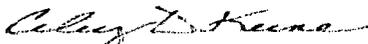
**Sample ID: IMPORTED TOPSOIL ZIEGLAR'S PIT (H201614-01)**

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	07/17/2012	ND	400	100	400	3.92	

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

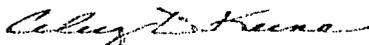
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- \*\* Samples not received at proper temperature of 6°C or below.
- \*\*\* Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
- Samples reported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

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager





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

## REVEGETATION FORM

### 1. General Information

Site name: <b>BD N-32 Vent</b>						
U/L N	Section 32	Township 21S	Range 37E	County Lea	Latitude 32°25'54.513"N	Longitude 103°11'18.251"W
Contact Name: <b>Bruce Baker</b>						
Email: <b>bbaker@rice-ecs.com</b>						
Site size: <b>60' x 90' 5400</b> 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):	60 in
Texture: sandy	Describe soil & subsoil: Sandy blow sand				
Soil prep methods: Rip <input type="checkbox"/>	Depth(in):	Disc <input checked="" type="checkbox"/>	Depth (in):	6 in	Rollerpack <input type="checkbox"/>
Date completed: 8/17/12					

### 3. Bioremediation

Fertilizer <input type="checkbox"/>	Hay <input type="checkbox"/>	Other <input type="checkbox"/>
Type:	Describe:	
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: 2.5 lbs side oats 2.5 lbs blue grama	Seeding date: 8/17/12
Broadcast <input checked="" type="checkbox"/>			
Method: Mechanical Spreader			
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: <b>Eduardo Garcia</b>	Title: <b>Environmental Tech</b>	Date: <b>8/17/12</b>
Signature: <i>Eduardo Garcia</i>		