

RICE *Operating Company*

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

approved Gerald Green

revised pages submitted

Geoffrey Leking

HOBBS OCD

January 14, 2014

Environmental Specialist

JAN 14 2014

NMOCD - DIST 1
01/14/14

RECEIVED

Mr. Geoffrey Leking
New Mexico Oil Conservation Division – District 1
1625 North French Drive
Hobbs, New Mexico 88240

RE: UPDATED Corrective Action Plan (CAP)
BD Jct. N-31-1 Accidental Discharge: Unit N, Section 31, T21S, R37E
API No. 30-025-38528
RICE Operating Company – Blinbry Drinkard SWD System

Mr. Leking:

ROC submits the following Corrective Action Plan (CAP) for the BD Jct. N-31-1 Accidental Discharge (AD). The AD was located in unit letter N, section 31, T21S, R37E, as shown in Figure 1. ROC is the service provider (agent) for the 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.

An accidental discharge of produced water was discovered on December 31, 2013. The NMOCD District 1 office was notified that day, and an initial C-141 was submitted to the District 1 office on January 2, 2014. According to the initial C-141, a PVC flange in the junction box cracked, releasing the 60 bbls of produced water, which affected a total of 10,995 ft² of pasture and lease road. After the AD was discovered, the line was shut in and a vacuum truck was used to recover 20 bbls of the produced water, then the flange was permanently repaired. The initial C-141 and photos of the leak are included in Appendix A.

On January 2, 2014, RECS personnel were onsite to collect hand auger soil samples at regular intervals in three separate areas. Each sample was field titrated for chloride and screen for hydrocarbons using a PID. Auger point 1 was collected near the source of the AD to a depth of 2 ft bgs. Chloride concentrations decreased from 7,494 mg/kg at the surface to a concentration of 152 mg/kg at 1.5 ft bgs and 87 mg/kg at 2 ft bgs. Auger point 2 was collected near the center of the AD to a depth of 1 ft bgs. Chloride concentrations decreased from 9,504 mg/kg at the surface to 245 mg/kg at 0.5 ft to 87 mg/kg at 1 ft bgs. Auger point 3 was collected from the southern part of the AD to a depth of 2.5 ft bgs. Chloride concentrations decreased from 7,109 mg/kg at the surface to 151 mg/kg at 2.5 ft bgs. Laboratory analysis confirmed chloride concentrations that decreased with depth and TPH concentrations below detectable limits. This data and the AD boundary is shown in Figure 2. The lab result is included in Appendix B.

JAN 15 2014

During a meeting with the District 1 NMOCD office on January 3, 2013, the following corrective actions were discussed. The AD will be separated into four different sections, based on chloride concentration. Area 1 is the soil surrounding auger points 1 and 2, Area 2 is the ravine section, Area 3 is the soil surrounding a former drill pit, and Area 4 is the soil surrounding auger point 3. To protect groundwater quality, ROC proposes to excavate Area 1 to a depth of 1-1.5 ft bgs. Area 2 is proposed to be excavated and sampled to verify chloride concentrations. Area 3 is proposed to be excavated to a depth of 2.5 ft bgs with a 20-mil reinforced liner being installed and properly seated at that depth. Area 4 is proposed to be excavated to a depth of 2.5 ft bgs. The specified excavation depths will remove the highest chloride concentrations. The excavation boundaries are summarized in Figure 2. Figure 3 is a detailed plat that shows surrounding features and non-ROC pipelines.

Each excavated area will then be backfilled with soil containing a chloride concentration below 500 mg/kg and a field PID reading below 100 ppm. Any soil requiring disposal will be properly disposed of at a NMOCD approved facility. The backfilled excavation will then be seeded with a blend of native vegetation. Vegetation provides a natural infiltration barrier, since plants capture water through their roots thereby reducing the amount of water traveling through the vadose zone.

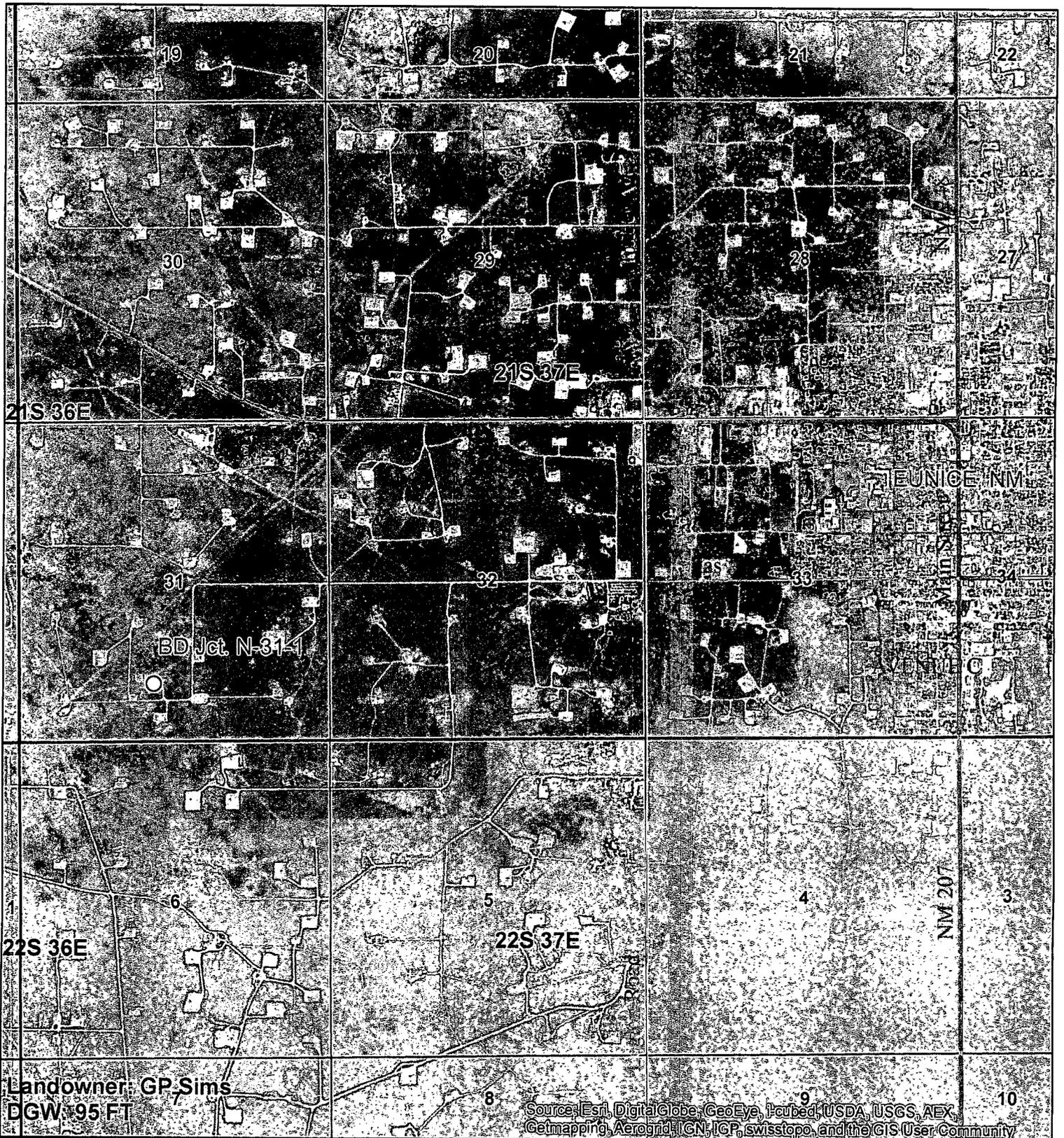
ROC appreciates the opportunity to work with you on this project. Please call Hack Conder or me at (575) 393-2967 if you have any questions or wish to discuss the site.

Sincerely,



Katie Jones
Environmental Project Manager
RICE Operating Company

Site Location Map

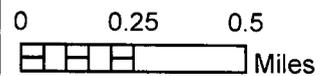
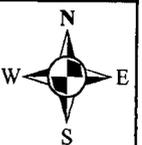


BD Jct. N-31-1

LEGALS: UL/N sec. 31
T-21-S R-37-E
LEA COUNTY

API No. 30-025-38528

Figure 1



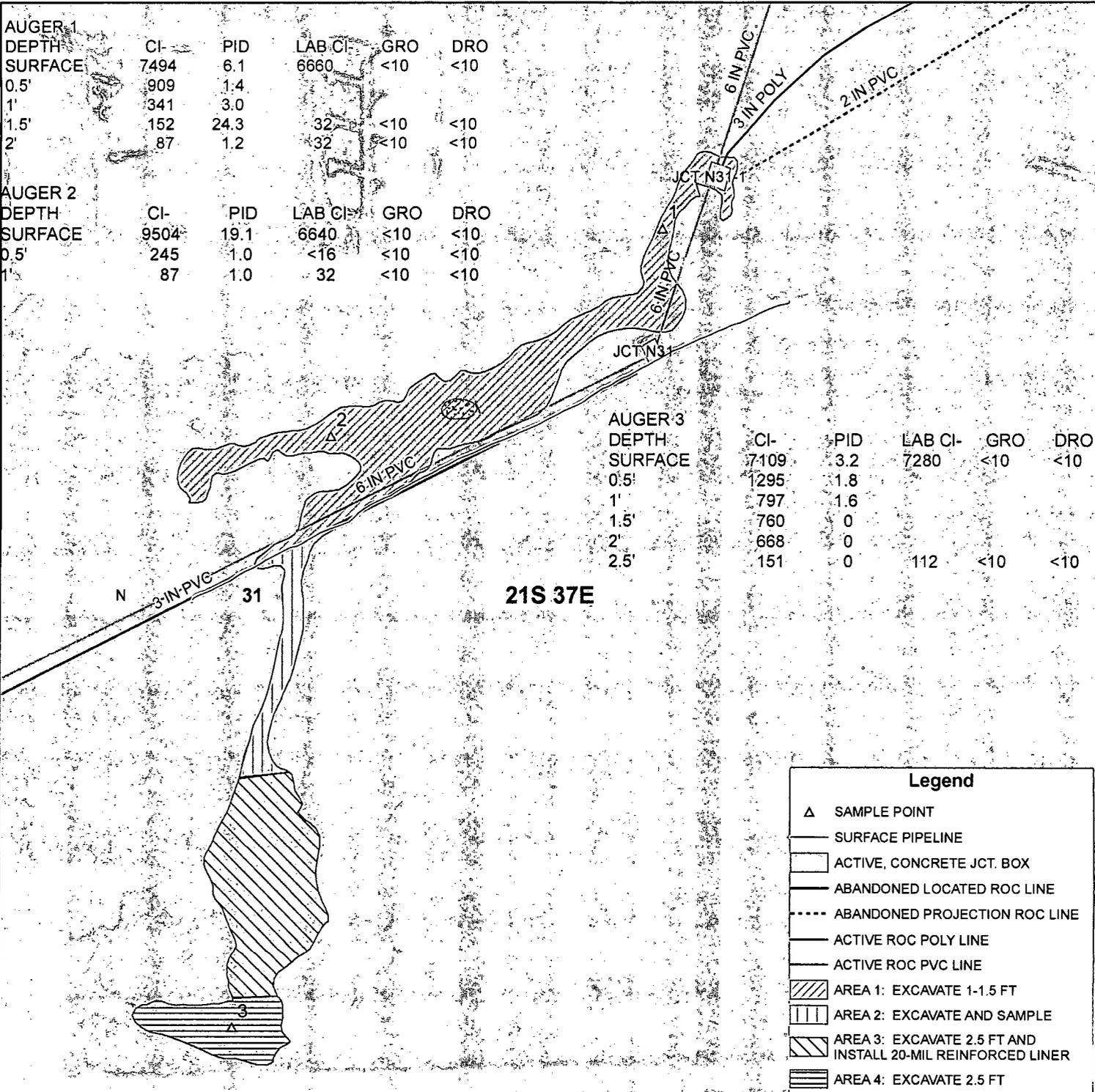
Drawing date: 1/3/14
Drafted by: T. Grieco

Proposed Excavation

AUGER 1 DEPTH	CI-	PID	LAB CI-	GRO	DRO
SURFACE	7494	6.1	6660	<10	<10
0.5'	909	1.4			
1'	341	3.0			
1.5'	152	24.3	32	<10	<10
2'	87	1.2	32	<10	<10

AUGER 2 DEPTH	CI-	PID	LAB CI-	GRO	DRO
SURFACE	9504	19.1	6640	<10	<10
0.5'	245	1.0	<16	<10	<10
1'	87	1.0	32	<10	<10

AUGER 3 DEPTH	CI-	PID	LAB CI-	GRO	DRO
SURFACE	7109	3.2	7280	<10	<10
0.5'	1295	1.8			
1'	797	1.6			
1.5'	760	0			
2'	668	0			
2.5'	151	0	112	<10	<10



Legend	
△	SAMPLE POINT
—	SURFACE PIPELINE
□	ACTIVE, CONCRETE JCT. BOX
—	ABANDONED LOCATED ROC LINE
---	ABANDONED PROJECTION ROC LINE
—	ACTIVE ROC POLY LINE
—	ACTIVE ROC PVC LINE
▨	AREA 1: EXCAVATE 1-1.5 FT
▧	AREA 2: EXCAVATE AND SAMPLE
▩	AREA 3: EXCAVATE 2.5 FT AND INSTALL 20-MIL REINFORCED LINER
▪	AREA 4: EXCAVATE 2.5 FT
▫	NON-STAIN
□	STAIN (10,995 sq ft)

Landowner: GP Sims
DGW: 95 FT

Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

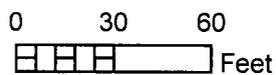


BD Jct. N-31-1

LEGALS: UL/N sec. 31
T-21-S R-37-E
LEA COUNTY

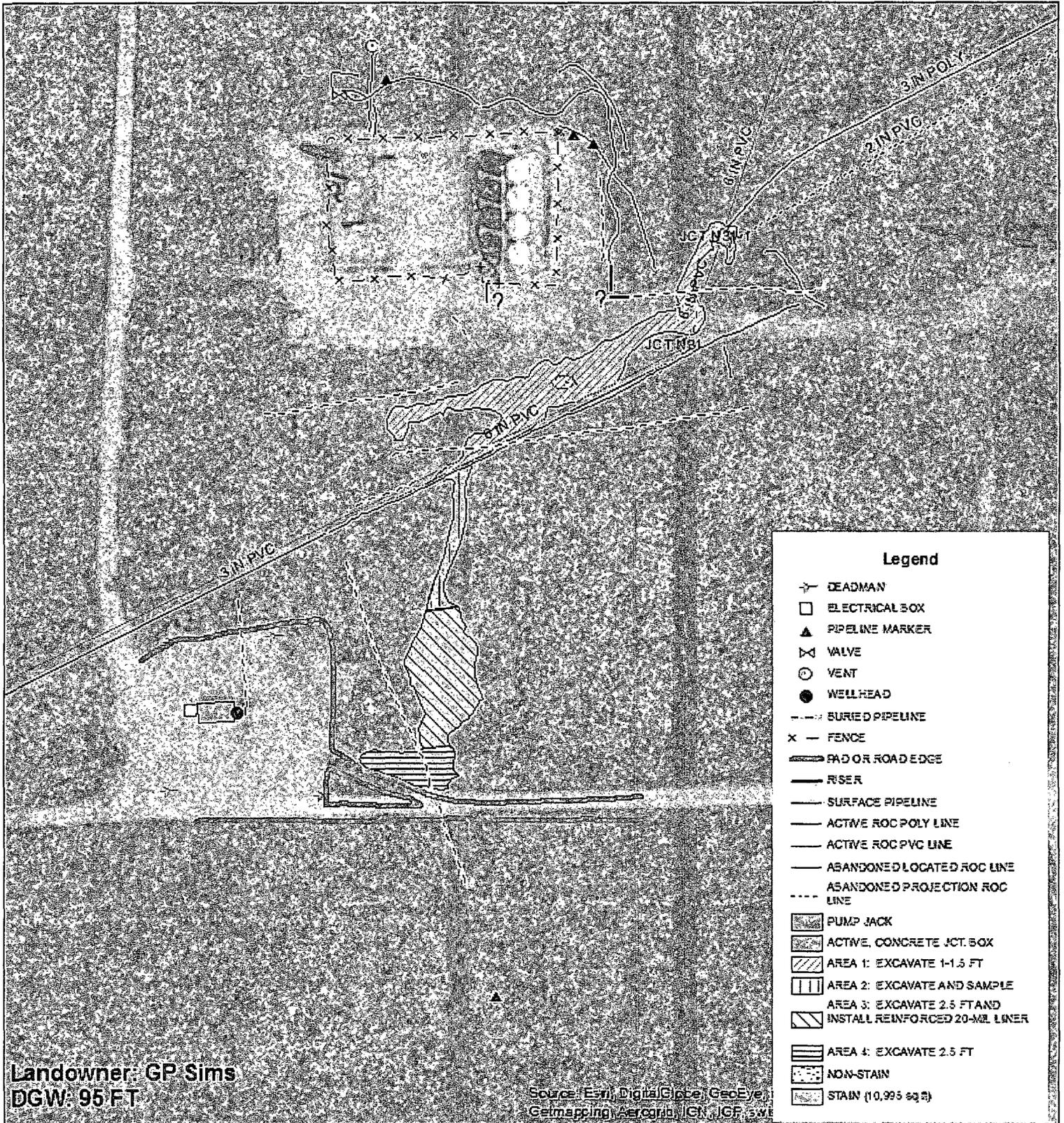
API No. 30-025-38528

Figure 2



GPS date: 12/31/13 KN
Drawing date: 1/2/14
Drafted by: L. Weinheimer

Lines

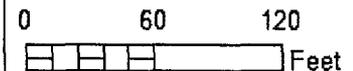
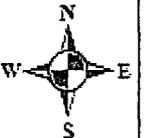


BD Jct. N-31-1

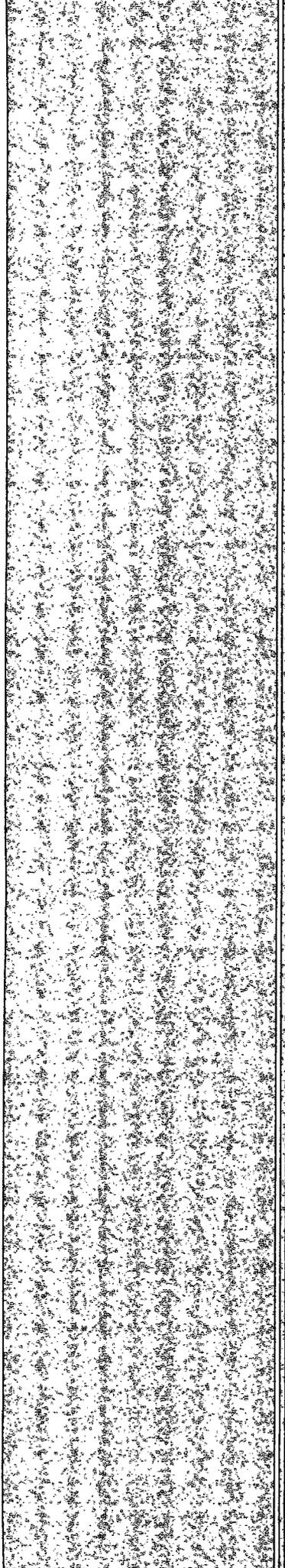
LEGALS: UL/N sec. 31
 T-21-S R-37-E
 LEA COUNTY

API No. 30-025-38528

Figure 3



GPS date: 1/6/14 BC
 Drawing date: 1/6/14
 Drafted by: T. Grieco



Appendix A

Initial C-141 and Photodocumentation

RICE Operating Company (ROC)
112 West Taylor Hobbs, NM 88240
Phone 575.393.9174

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Form C-141
Revised August 8, 2011

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company	Rice Operating Company	Contact	Hack Conder
Address	122 W. Taylor St., Hobbs, NM 88240	Telephone No.	(575) 631-6432
Facility Name	BD Jct. N-31-1	Facility Type	Junction Box

Surface Owner	G.P. Sims	Mineral Owner		API No.	3002538528
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
N	31	21S	37E	1018	FSL	2229	FWL	Lea

Latitude 32.431016 Longitude -103.203183

NATURE OF RELEASE

Type of Release	Produced water	Volume of Release	60 bbls	Volume Recovered	20 bbls
Source of Release	Junction box	Date and Hour of Occurrence	12/31/13 11:00 am	Date and Hour of Discovery	12/31/13 11:00 am
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Geoff Leking - NMOCD		
By Whom?	Hack Conder	Date and Hour	12/31/13 2:20 pm		
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.			

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*
The PVC flange in the junction box cracked releasing 60 barrels of produced water. The line was shut in and isolated. A vacuum truck was called to the site and recovered 20 barrels of produced water. The flange will be repaired on 1/2/14.

Describe Area Affected and Cleanup Action Taken.*
A total of 10,995 sq ft of pasture land and lease road was affected. Initial assessment and remediation will begin on 1/2/14 and the site will be remediated to NMOCD guidelines.

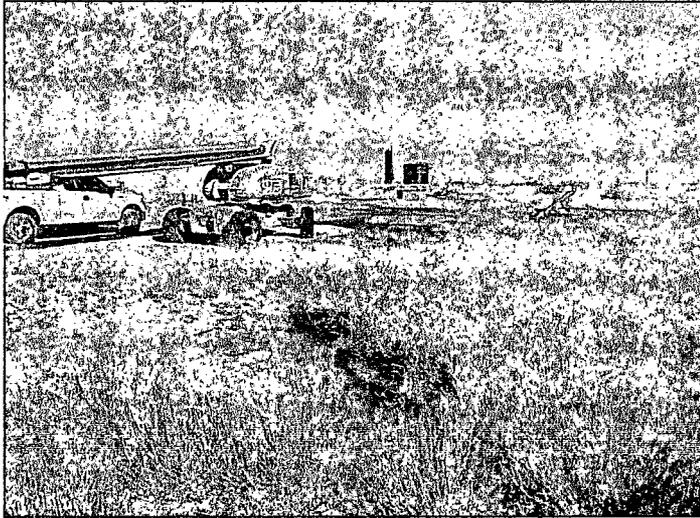
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	OIL CONSERVATION DIVISION	
Printed Name: Hack Conder	Approved by Environmental Specialist:	
Title: Environmental Manager	Approval Date:	Expiration Date:
E-mail Address: hconder@riceswd.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: _____ Phone: (575) 631-6432		

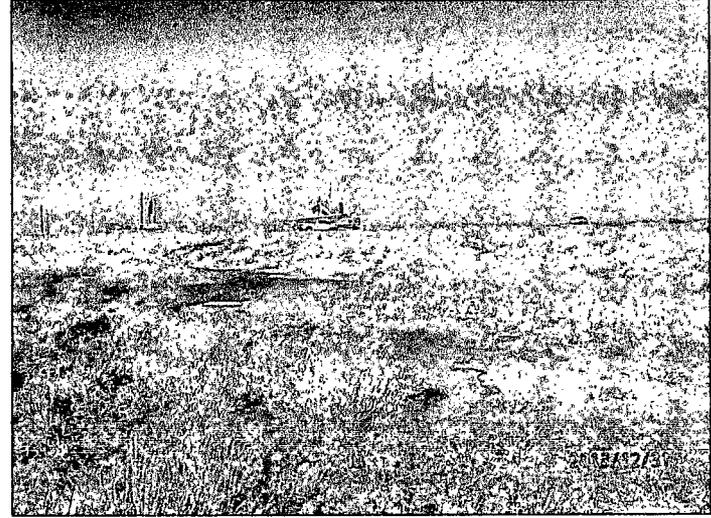
* Attach Additional Sheets If Necessary

BD Jct. N-31-1 (API# 30-025-38528)

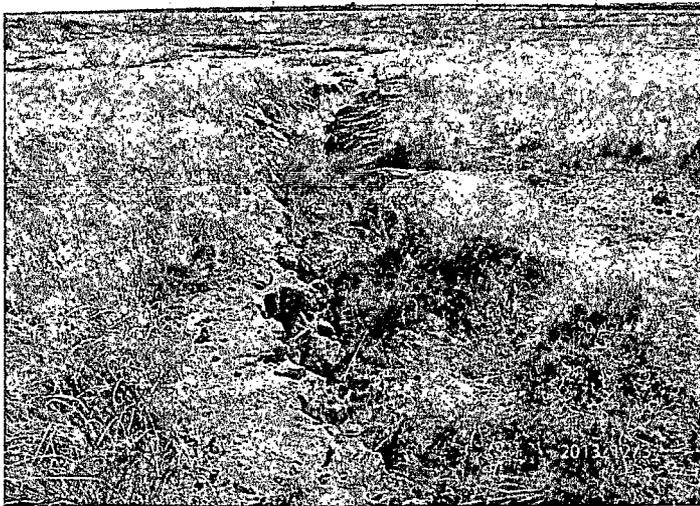
Unit N, Section 31, T21S, R37E



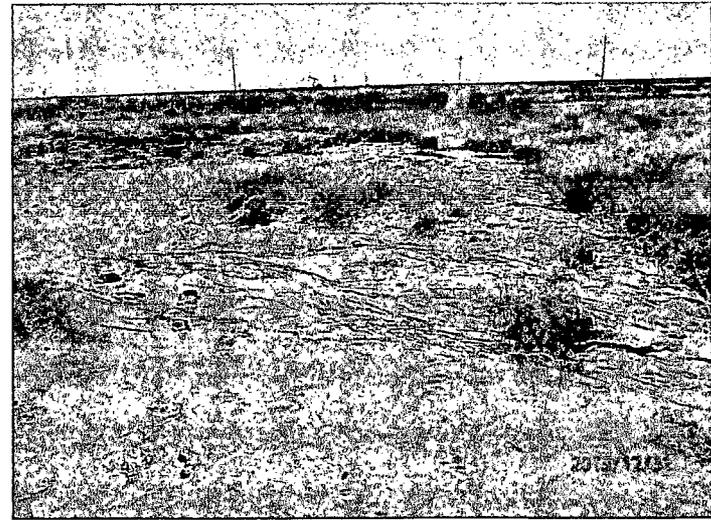
Facing northeast



Facing north



Facing south



Facing south



Appendix B

Laboratory Analysis

RICE Operating Comany (ROC)
112 West Taylor Hobbs, NM 88240
Phone 575.393.9174

January 07, 2014

KYLE NORMAN

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: BD N-31-1

Enclosed are the results of analyses for samples received by the laboratory on 01/06/14 8:05.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. 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.

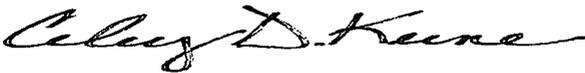
Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

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,



Celest D. Keene

Lab Director/Quality Manager

Analytical Results For:

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

 Received: 01/06/2014
 Reported: 01/07/2014
 Project Name: BD N-31-1
 Project Number: NONE GIVEN
 Project Location: T21S R37E

 Sampling Date: 01/02/2014
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: PT. 1 @ SURFACE (H400021-01)

Chloride, SM4500CI-B

mg/kg

Analyzed By: AP

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	6660	16.0	01/07/2014	ND	416	104	400	3.77	

TPH 8015M

mg/kg

Analyzed By: ms

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	01/06/2014	ND	212	106	200	3.32	
DRO >C10-C28	<10.0	10.0	01/06/2014	ND	207	103	200	2.78	

Surrogate: 1-Chlorooctane 90.5 % 65.2-140

Surrogate: 1-Chlorooctadecane 90.8 % 63.6-154

Sample ID: PT. 1 @ 1.5 FT (H400021-02)

Chloride, SM4500CI-B

mg/kg

Analyzed By: AP

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	01/07/2014	ND	416	104	400	3.77	

TPH 8015M

mg/kg

Analyzed By: ms

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	01/06/2014	ND	212	106	200	3.32	
DRO >C10-C28	<10.0	10.0	01/06/2014	ND	207	103	200	2.78	

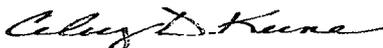
Surrogate: 1-Chlorooctane 98.0 % 65.2-140

Surrogate: 1-Chlorooctadecane 94.4 % 63.6-154

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

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

 Received: 01/06/2014
 Reported: 01/07/2014
 Project Name: BD N-31-1
 Project Number: NONE GIVEN
 Project Location: T21S R37E

 Sampling Date: 01/02/2014
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: PT. 1 @ 2 FT (H400021-03)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	01/07/2014	ND	416	104	400	3.77		
TPH 8015M		mg/kg		Analyzed By: ms						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	01/06/2014	ND	212	106	200	3.32		
DRO >C10-C28	<10.0	10.0	01/06/2014	ND	207	103	200	2.78		

Surrogate: 1-Chlorooctane 98.3 % 65.2-140
 Surrogate: 1-Chlorooctadecane 94.4 % 63.6-154

Sample ID: PT. 2 @ SURFACE (H400021-04)

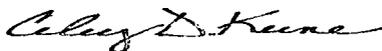
Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	6640	16.0	01/07/2014	ND	416	104	400	3.77		
TPH 8015M		mg/kg		Analyzed By: ms						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	01/06/2014	ND	212	106	200	3.32		
DRO >C10-C28	<10.0	10.0	01/06/2014	ND	207	103	200	2.78		

Surrogate: 1-Chlorooctane 98.8 % 65.2-140
 Surrogate: 1-Chlorooctadecane 93.1 % 63.6-154

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

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

Received:	01/06/2014	Sampling Date:	01/02/2014
Reported:	01/07/2014	Sampling Type:	Soil
Project Name:	BD N-31-1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	T21S R37E		

Sample ID: PT. 2 @ 6 IN (H400021-05)

Chloride, SM4500CI-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	01/07/2014	ND	416	104	400	3.77		
TPH 8015M		mg/kg		Analyzed By: ms						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	01/06/2014	ND	212	106	200	3.32		
DRO >C10-C28	<10.0	10.0	01/06/2014	ND	207	103	200	2.78		

Surrogate: 1-Chlorooctane 94.6 % 65.2-140
 Surrogate: 1-Chlorooctadecane 88.2 % 63.6-154

Sample ID: PT. 2 @ 1 FT (H400021-06)

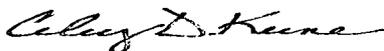
Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	01/07/2014	ND	416	104	400	3.77		
TPH 8015M		mg/kg		Analyzed By: ms						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	01/06/2014	ND	212	106	200	3.32		
DRO >C10-C28	<10.0	10.0	01/06/2014	ND	207	103	200	2.78		

Surrogate: 1-Chlorooctane 97.9 % 65.2-140
 Surrogate: 1-Chlorooctadecane 92.8 % 63.6-154

Cardinal Laboratories

* = Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

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

Received:	01/06/2014	Sampling Date:	01/02/2014
Reported:	01/07/2014	Sampling Type:	Soil
Project Name:	BD N-31-1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	T21S R37E		

Sample ID: PT. 3 @ SURFACE (H400021-07)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	7280	16.0	01/07/2014	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: ms						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	01/06/2014	ND	212	106	200	3.32		
DRO >C10-C28	<10.0	10.0	01/06/2014	ND	207	103	200	2.78		

Surrogate: 1-Chlorooctane 91.6 % 65.2-140

Surrogate: 1-Chlorooctadecane 85.3 % 63.6-154

Sample ID: PT. 3 @ 2.5 FT (H400021-08)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	112	16.0	01/07/2014	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: ms						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	01/06/2014	ND	212	106	200	3.32		
DRO >C10-C28	<10.0	10.0	01/06/2014	ND	207	103	200	2.78		

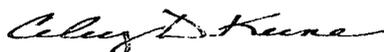
Surrogate: 1-Chlorooctane 95.0 % 65.2-140

Surrogate: 1-Chlorooctadecane 92.4 % 63.6-154

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*=Accredited Analyte

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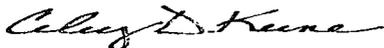
Notes and Definitions

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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