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**

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

## HOBBS OCD

Form C-141 Revised August 8, 2011 OCT 2 4 2011 Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC. RECEIVED

# **Release Notification and Corrective Action**

			<b>OPERATOR</b>	🗌 Initial Report 🛛 Final Repo
Name of Company	Southern Union Gas Se	ervices	Contact	Rose Slade
Address	801 S. Loop 464, Mona	hans, TX 79756	Telephone No.	817-302-9716
Facility Name	Grobe 4" (4/27/09)		Facility Type	Natural Gas Gathering
Surface Owner: Elena	Globe	Mineral Owner	:: State	API No. 30-025-28822

#### LOCATION OF RELEASE

Unit Letter Section Township Range G 15 24 S 37 E	Feet from the North/South Line	Feet from the East/West Line	County Lea
------------------------------------------------------	--------------------------------	------------------------------	---------------

Latitude N32° 13.110' Longitude W103° 09.038'

#### NATURE OF RELEASE

Type of Release : Crude Oil, Produced water and Natural Gas	Volume of Release: Less than 50	Volume Recovered None
	MCF gas, 10 bbls of crude oil	
Source of Release : 4" Natural Gas Pipeline	Date and Hour of Occurrence	Date and Hour of Discovery 04/27/09
	Not known	11:08 a.m.
Was Immediate Notice Given?	If YES, To Whom?	
🗌 Yes 🛛 No 🗌 Not Required		
By Whom?	Date and Hour	
Was a Watercourse Reached?	If YES, Volume Impacting the Wat	ercourse.
🗋 Yes 🔀 No		

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

The 4" Natural gas pipeline developed a leak operating at approximately 30 psi. A temporary clamp was placed on the line until permanent repairs were made in June 2009. The first assessment estimated the leak at less than 5 bbls. Once the oily soil was removed a new assessment was made on 06/22/09 estimating the loss at 10 bbls of crude oil and produced water.

Describe Area Affected and Cleanup Action Taken.\*

All clean-up actions are completed. See attached summary.

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. CONCEDUATION DIVICION

1	1000	<u>OIL CONSER</u>	VATION DIVISION	
Signature:	Alitan			
Drinted Name	Rose Slade CURT STANCE	Approved by Environmental Special	ist:	
Printed Name:	"HOGE SIGDE UCIET STANC	1		
Title:	EHS Compliance Specialist	Approval Date:	Expiration Date:	
E-mail Address:	rose.slade@sug.com	Conditions of Approval:	Attached	
Date:	Phone: 817-302-9716		RP#: 2217	

\* Attach Additional Sheets If Necessary

2217 - :PGRL #917738568 IKH-2217-0 2009-028

District I 1625 N. French Dr , Hobbs, NM 88240 District II 1301 W. Grand Avenue, Artesia, NM 88210 District III 1000 Rio Brazos Road, Aztec, NM 87410 District IV 1220 S St. Francis Dr , Santa Fc, NM 87505

RECEIVED State of New Mexico Energy Minerals and Natural Resources JUN 26 2009 Oil Conservation Division

HOBBSOCD220 South St. Francis Dr.

Santa Fe, NM 87505

Form C-141 Revised October 10, 2003

Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

			Rele	ease Notific	catio	n and Co	orrective A	ction			
						<b>OPERA</b>	TOR	X	Initia	al Report	Final Report
Name of Co	ompany	South	ern Unio	n Gas Services,	Ltd.	Contact					Tony Savoie
Address		P.0	). Box 12	26 Jal, N.M. 8	8252	Telephone ]	No.				505-395-2116
Facility Na	me		Lea	County Field I	Dept.	Facility Typ	De			Natu	aral Gas Gathering
Surface Ow	mer: Elena	Grobe		Mineral C				1	Lease N	lo.	
Unit Letter G	Section 15	Township 24S	Range 37E	Feet from the		N OF RE	Feet from the	East/Wes	Line	County	Lea
	I		L	NAT		OF REL					
Type of Rele	ase : Crude	Oil, Produced	water and	d Natural Gas		Volume of	Release: Less th	an 50 V	olume F	lecovered	NONE

MCF gas, 10 bbls of crude oil Source of Release : 4" Natural Gas Pipeline Date and Hour of Discovery 4/27/09 Date and Hour of Occurrence not known 11:08 a.m. If YES, To Whom? Was Immediate Notice Given? 🗌 Yes 🖾 No 🗌 Not Required By Whom? Date and Hour: Was a Watercourse Reached? If YES, Volume Impacting the Watercourse. Yes X No If a Watercourse was Impacted, Describe Fully.\* WATER @ 75 JARL 06/26/09 Describe Cause of Problem and Remedial Action Taken.\* The 4" Natural gas pipeline developed a leak operating at approximately 30 psi. a Temporary clamp was placed on the line until permanent repairs were made in June 2009. The first assessment estimated the leak at less than 5 bbls. Once the oily soil was removed a new assessment was made on 6/22/09 estimating the loss at 10bbls of crude oil and produced water.

Describe Area Affected and Cleanup Action Taken. Approximately 250 sq.ft. of pasture land was affected by the leak and temporary repair. Remediation started on 6/22/09 Final remediation will follow the NMOCD recommended guidelines for leaks and spills.

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.

		OIL CONSE	ERVATION	DIVISION
Signature: Joy	Dance	Approved by District Supervisor:		
Printed Name: John A. S	avoie		secons	Leking
Title: Remediation Supervis	or	Approval Date: 06/26/09		0 0 Date: 08/25 09
E-mail Address: tony.savoie	@sug.com	Conditions of Approval: DELINE	RETO VAL (-141	Attached
Date: 6/26/09	Phone: 505-395-2116	8408125109,		1RP-09-6-2217

\* Attach Additional Sheets If Necessary

FGRL0917737758

### I. Clean-up Criteria Based on Ranking Analysis

Site Ranking		Points
Depth to Ground Water	90 ft. Avg. based on initial C-141; recent POD Report search indicates a well in section 23 (SE) with avg water depth of 94 ft.	10
Well Head Protection	4228 Horizontal ft.	0
Surface Water Body	2.07 Horizontal Miles	0
	Total Ranking Score	10

	Benzene (mg/kg)	BTEX (mg/kg)	TPH (mg/kg) "Surface"	Chlorides (mg/kg)
Site Closure Objective	10	50	1000	500

### II. Area Affected and Clean-up Action Taken

Date	Action
04/27/2009	Discovery and initial visual assessment.
06/22/2009	Follow-up visual assessment. Approximately 250 sq. ft. of pasture land was affected by
	the leak and temporary repair. Initiated excavation of affected soil.
06/23/2009	Completed excavation of affected soil. Affected soil is stockpiled on-site. Collected one
	soil sample from soil pile.
06/26/2009	Soil sampling of excavated area and soil pile. Sample results indicate removal is
	complete. Estimated 348 cu.yds. of affected soil was excavated and stockpiled on-site.
07/09/2009	Hauled out 120 cu.yds of affected soil to SUGS landfarm.
07/10/2009	Hauled out 228 cu.yds of affected soil to SUGS landfarm. Total removed = 348 cu.yds.
07/13/2009	Hauled in 192 cu.yds. of clean backfill from Grove Pit.
07/14/2009	Hauled in 168 cu.yds. of clean backfill from Grove Pit. Total backfill = 360 cu.yds.
	Remediation complete.

#### III. Additional Supporting Documentation:

- A. Table 1: Summary of Laboratory Results
- B. Initial C-141 Submittal
  - i. Initial C-141 Report
  - ii. Remediation Plan Cover Page
  - iii. Site Remediation Plan Cover Page
  - iv. Site Topography Map
  - v. Ranking Analysis
  - vi. Site Photographs
- C. Lab Reports
- D. Daily Trucking Tickets

#### Table 1. Summary of Analytical Results Grobe 4"; SUGS#: 2009-028; RP#: 2217 Southern Union Gas Services

		Method 8015M		Method 8021B				SM 4500		
Sampling Date	Sample ID/Location	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg	Total TPH C6-C28 mg/kg	Benzene mg/kg	Toluene mg/kg	Ethylbenzene mg/kg	Xylenes mg/kg	Total BTEX mg/kg	Chloride mg/kg
NMOCD SC	REENING CRITERIA			1000	10				50	500
06/23/09	SP-COMP.	NA	NA	NA	NA	NA	NA	NA	NA	1840
06/26/09	PR @ 10'	< 10.0	67.8	67.8	< 0.050	< 0.050	< 0.050	< 0.300	< 0.300	112
06/26/09	B-COMP.	< 10.0	< 10.0	ND	NA	NA	NA	NA	NA	64
06/26/09	SP-COMP.	393	3450	3843	NA	NA	NA	NA	NA	784
06/26/09	NW-COMP.	< 10.0	< 10.0	ND	NA	NA	NA	NA	NA	16
06/26/09	EW-COMP.	< 10.0	38.6	38.6	NA	NA	NA	NA	NA	144
06/26/09	SW-COMP.	< 10.0	17.4	17.4	NA	NA	NA	NA	NA	16
06/26/09	WW-COMP.	< 10.0	< 10.0	ND	NA	NA	NA	NA	NA	208

Notes:

NA = Not Analysed

ND = Analyte was not detected



**Remediation Plan** 

RECEIVED

@

JUN 2 6 2009 HOBBSOCD

Grobe 4"

Project # 2009-028

NMOCD IRP#

Unit Itr."G" Section 15 Twns. 24S Range 37E

Lea County, New Mexico

# **Site Remediation Plan**

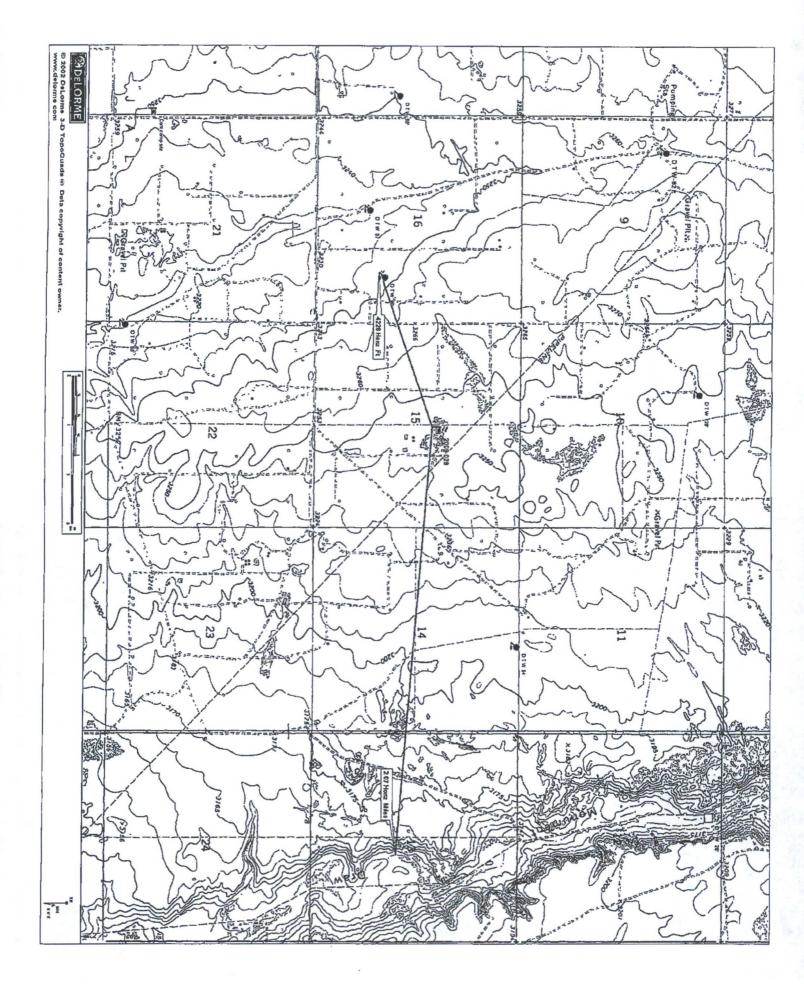
Southern Union Gas Services Grobe 4" 2009-028 NMOCD IRP#

Unit Itr. "G" Section 15, Twns. 24S, Range 37E

Waste Management and Remediation Specialist

Signature <u>/</u>	Que	Da	no	
Date: 6	1261	09		

Tony Savoie P.O. Box 1226 Jal, New Mexico 88252 575-631-9376 E-mail: tony.savoie@sug.com



# Grobe 4" Job # 2009-028 **Ranking Analysis**

NMOCD Standards					Points	
Depth to Ground Wa	ter	Greater than 10	Greater than 100 ft.			
Depth to Ground Wa	ter	Less than 100	Less than 100 ft. but greater than 50 ft.			
Depth to Ground Wat	ter	Less than 50 ft.			20	
Well Head Protection	1	Less than 1000	) ft. from a water source, or;	Yes	20	
		Less than 200	ft. from private domestic water source	No	0	
Distance to Surface v	vater body	Less than 200	Horizontal. ft.		20	
Distance to Surface v	vater body	200 to 1000 Ho	prizontal ft.		10	
Distance to Surface v	vater body	Greater than 10	000 Horizontal ft.		0	
Action levels	>19	10-19	0-9			
Benzene (mg/kg)	10	10	10		-	
BTEX (mg/kg)	50	50	50			
TPH (mg/kg)	100	1000	5000			

Site Ranking		Points
Depth to Ground Water	90 ft,	10
Well Head Protection	4228 Horizontal Feet	0
Surface Water Body	2.07 Horizontal Miles	0
	Total Ranking Score	10

Tota	I Ranking	Score	
------	-----------	-------	--

Site Closure Objective			
Benzene (mg/kg)	10	· · · · · · · · · · · · · · · · · · ·	
BTEX (mg/kg)	50		
TPH (mg/kg)	Delineation 100mg/kg	Backfill 1000 mg/kg	
Chloride (mg/kg)	Delineation 250mg/kg	Backfill 500 mg/kg	

**Remediation Plan:** 

All affected soil will be excavated and sampled for the presence of Hydrocarbons EPA method (8015M) and Chlorides method 4500-CI-B or 300 S

Soil with TPH values greater than 1000 mg/kg will be transported to the S.U.G.S Landfarm

Soil with Chloride values greater than 1000 mg/kg will be disposed of in an approved facility

Soil with Chloride value less than 1000 mg/kg but greater than 250 mg/kg will be transported to the S.U.G.S. Landfarm.

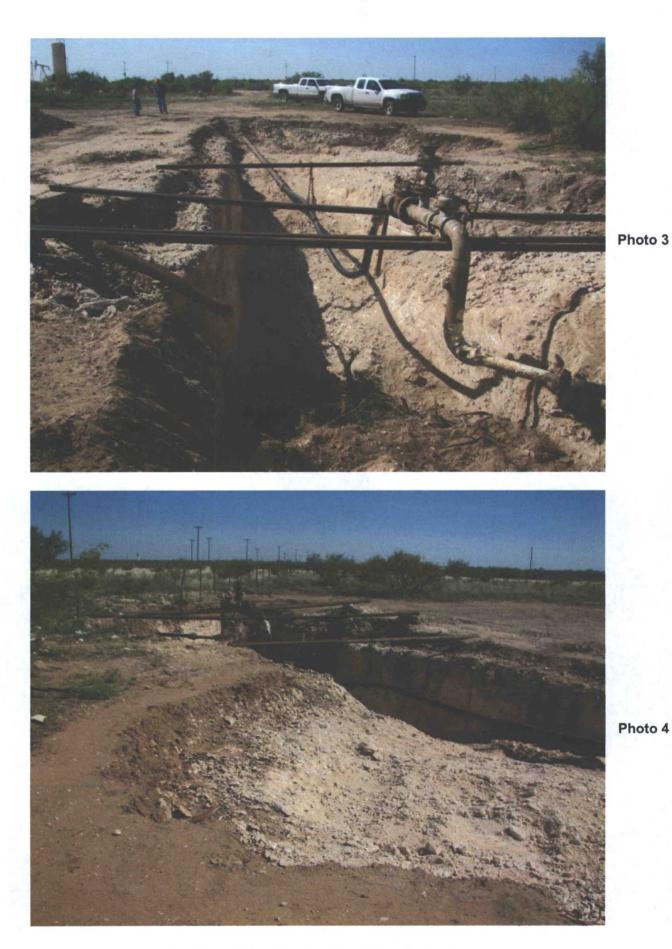
Soil samples will be collected from the excavation and analyzed for Hydrocarbons EPA method (8015M) and Chlorides method 4500-Cl-B or 300 S

All samples will be field screened with a "PID" The soil sample with the highest PID reading will be analyzed separately and tested for BTEX.



Photo 1

Photo 2



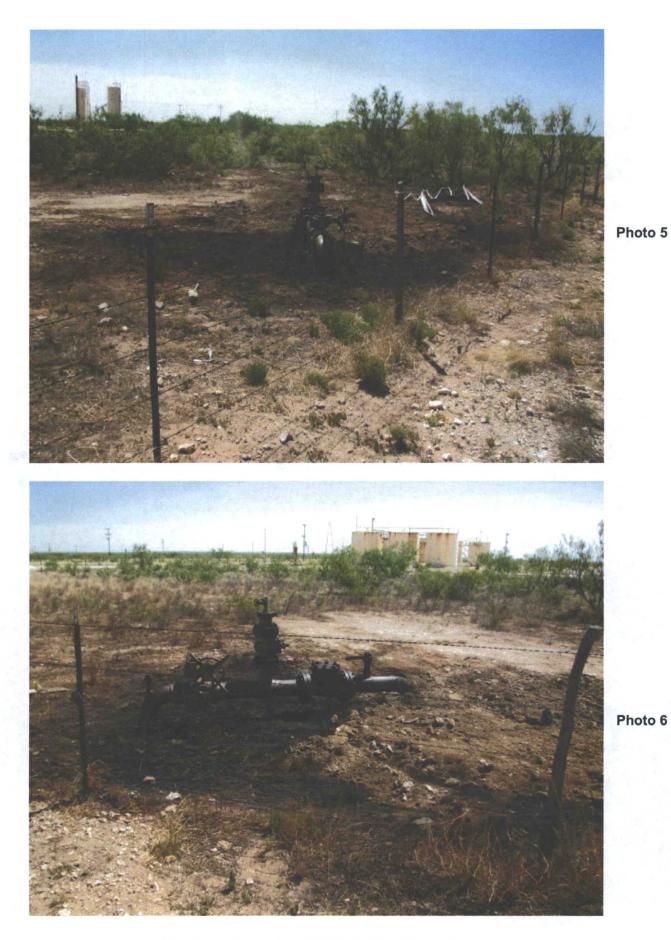




Photo 7



June 24, 2009

Tony Savoie Southern Union Gas Services P.O. Box 1226 Jal, NM 88252

Re: Grobe 4"

Enclosed are the results of analyses for sample number H17684, received by the laboratory on 06/23/09 at 11:20 am.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021 Method SW-846 8260 Method TX 1005 Benzene, Toluene, Ethyl Benzene, and Total Xylenes Benzene, Toluene, Ethyl Benzene, and Total Xylenes Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Total Number of Pages of Report: 3 (includes Chain of Custody)

Sincerely,

Celey D. Keene Laboratory Director

This report conforms with NELAP requirements.



ANALYTICAL RESULTS FOR SOUTHERN UNION GAS SERVICES ATTN: TONY SAVOIE P.O. BOX 1226 JAL, NM 88252

Receiving Date: 06/23/09 Reporting Date: 06/24/09 Project Number: NOT GIVEN Project Name: GROBE 4" Project Location: GROBE RANCH

LAB NO.

Analysis Date: 06/23/09 Sampling Date: 06/23/09 Sample Type: SOIL Sample Condition: COOL & INTACT @ 6 °C Sample Received By: AB Analyzed By: AB

SAMPLE ID

CL (mg/kg)

H17684-1 SP-COMP.	1,840
Quality Control	490
True Value QC	500
% Recovery	98.0
Relative Percent Difference	2.0

METHOD: Standard Methods 4500-CIB Note: Analysis performed on a 1:4 w:v aqueous extract.

Chemis

06/24/09 Date

#### H17684 SUGS

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 pald 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 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.



July 1, 2009

Tony Savoie Southern Union Gas Services P.O. Box 1226 Jal, NM 88252

Re: Grobe 4"

Enclosed are the results of analyses for sample number H17707, received by the laboratory on 06/26/09 at 3:48 pm.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021 Method SW-846 8260 Method TX 1005 Benzene, Toluene, Ethyl Benzene, and Total Xylenes Benzene, Toluene, Ethyl Benzene, and Total Xylenes Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Total Number of Pages of Report: 4 (includes Chain of Custody)

Sincerely,

Celey D. Keene Laboratory Director

This report conforms with NELAP requirements.



DANALYTICAL RESULTS FOR SOUTHERN UNION GAS SERVICES ATTN: TONY SAVOIE P.O. BOX 1226 JAL, NM 88252

Receiving Date: 06/26/09 Reporting Date: 06/29/09 Project Number: 2009-028 Project Name: GROBE 4" Project Location: GROBE RANCH Sampling Date: 06/26/09 Sample Type: SOIL Sample Condition: COOL & INTACT @ 6°C Sample Received By: AB Analyzed By: AB/HM

GRO	DRO	
(C6-C10)	(>C10-C28)	CI*
(mg/kg)	(mg/kg)	(mg/kg)

LAB NUMBER SAMPLE ID

ANALYSIS I	DATE	06/27/09	06/27/09	06/29/09
H17707-1	PR @ 10'	<10.0	67.8	112
H17707-2	B-COMP.	<10.0	<10.0	64
H17707-3	SP-COMP.	393	3,450	784
H17707-4	NW-COMP.	<10.0	<10.0	16
H17707-5	EW-COMP.	<10.0	38.6	144
H17707-6	SW-COMP.	<10.0	17.4	16
H17707-7	WW-COMP.	<10.0	<10.0	208
:	¢			
Quality Cont	rol	541	512	500
True Value (	20	500	500	500
% Recovery		108	102	100
<b>Relative</b> Per	cent Difference	3.2	4.9	<0.1

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI<sup>-</sup>: Std. Methods 4500-CI<sup>-</sup>B \*Analyses performed on 1:4 w:v aqueous extracts. Reported on wet weight. Not NELAP accredited for GRO/DRO and Chloride.

Surrogate for H17707-2 outside historical limits due to matrix interference.

Chemist

07/01/09 Date

H17707 TCL SUGS

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 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.



ANALYTICAL RESULTS FOR SOUTHERN UNION GAS SERVICES ATTN: TONY SAVOIE P.O. BOX 1226 JAL, NM 88252

Receiving Date: 06/26/09 Reporting Date: 06/30/09 Project Number: 2009-028 Project Name: GROBE 4" Project Location: GROBE RANCH Sampling Date: 06/26/09 Sample Type: SOIL Sample Condition: COOL & INTACT @ 6°C Sample Received By: AB Analyzed By: ZL

LAB NO.	SAMPLE ID	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL BENZENE (mg/kg)	TOTAL XYLENES (mg/kg)
ANALYSIS DAT	TE:	06/29/09	06/29/09	06/29/09	06/29/09
H17707-1	PR @ 10'	<0.050	<0.050	<0.050	<0.300
Quality Control	*	0.052	0.052	0.054	0.161
True Value QC		0.050	0.050	0.050	0.150
% Recovery		104	104	108	107
<b>Relative Percen</b>	t Difference	3.8	1.9	1.8	<1.0

METHODS: EPA SW-846 8021B.

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE, AND TOTAL XYLENES. Reported on wet weight.

07/01/09 Date

#### H17707 B SUGS

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 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.

UNAL LABORATORIES 101 East Mariand, Hobbs, NM 88240 (575) 393-2326 Fax (575) 393-2476 5455, 393-2326 Fax (575) 393-2476 5455, 393-2326 Fax (575) 393-2476 546 % State: N/7421p: 2545 % State: N/7421p: 262 % State: N/7421p: 263 % State: N/7421p: 263 % State: N/7421p: 264 % State: N/7421p: 276 % State: N/7421p:	BILL TO   P.O. #:   P.O. #:   ST2.5.2   Attn::   State:   ZIP:   Address:   CIPY:   State:   ZIP:   Phone #:   Phone #:	Page L of ANALYSIS REQUEST ANALYSIS REQU	
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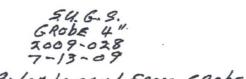
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HOURS WORKED 9	PER HOUR
TRUCKER <u>CL. CARVER</u>	1240 DUMPTRUCK# 1107 DATE 7-10-09
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COMPANY	
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9-LOADS SAND FROM GRODE Pit

OCOTILLO ENVIRONMENTAL, LLC

HOURS WORKED 10	PER HOUR	
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ADDRESS		
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TRUCKER L. Combs	12YD DUMPTRUCK # 1108 DATE 7-13-09		
ADDRESS			
COMPANYS.U.G.S.	· ·		
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5.4.6.3. 6R016 4" 2009-028 7-14-09

7-LOADS SAND FROM GRODE PIT

OCOTILLO ENMRONMENTAL, LLC.

HOURS WORKED 8	PER HOUR \$	
TRUCKER C.L. CARVER	12YD DUMPTRUCK # 1107	DATE 7-14-09
ADDRESS		
COMPANY		
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