BW-8

C-141s



October 15, 2010

Mr. Jon Ammons PAB Services, Inc. P.O. Box 2724 Lubbock, TX 79408

Re: Surface Soil Sampling Brine Well Area, Salty Dog Brine Facility

Dear Mr. Ammons:

On September 28, 2010, Daniel B. Stephens & Associates, Inc. (DBS&A) collected two soil samples from the area of a recent surface release in the vicinity of the brine well at the Salty Dog facility. The brine release, as you described it to me, occurred aboveground at the wellhead on September 9, 2010 at approximately 9:30 PM, and consisted of approximately 150 barrels of brine. The majority of the release was contained within the bermed area of the brine well; however, a small breech in the berm allowed approximately 20 barrels of brine to flow to the north and accumulate in the road. The area of release was noted in the field by chloride stained and wet soil.

DBS&A collected surface soil samples from 0-6 inches below ground surface (bgs) at two locations within the bermed area of the well. The samples were submitted to Hall Environmental Analysis Laboratory in Albuquerque, New Mexico for chloride analysis in accordance with U.S. Environmental Protection Agency (EPA) method 300.0. The analytical results are summarized in Table 1 (Attachment 1), and the laboratory report is provided in Attachment 2. Sample SBW-1 contained a chloride concentration of 15,000 milligrams per kilogram (mg/kg) and SBW-2 contained a chloride concentration of 12,000 mg/kg. Both of these samples exceed the New Mexico Oil Conservation Division (OCD) standard of 500 mg/kg for confirmatory soil samples collected from an area where the groundwater is between 50 and 100 feet bgs.

DBS&A recommends that you notify OCD of the release, if not already done, and provide them with the results of the surface soil samples at your earliest convenience. Please don't hesitate to call me at (505) 353-9130 if you have any questions or require additional information.

Sincerely,

DANIEL B. STEPHENS & ASSOCIATES, INC.

1:1).2,

Michael D. McVey Senior Hydrogeologist

MDM Attachments

Daniel B. Stephens & Associates, Inc.

6020 Academy Rd., NE, Suite 100 S-\Projects\ES08.0118.01_Salty_Dog_Inc\ES08.0118.02_Salty Dog Remediation\Docs\Brine release_soil sampling\Ammons_101510.doc

Albuquerque, NM 87109-3315

FAX 505-822-8877

505-822-9400

Attachment 1

Table





Daniel B. Stephens & Associates, Inc.

Table 1. Summary of Chloride Soil Analytical DataSalty Dog Brine Facility, Lea County, New MexicoPage 1 of 1

Sample Designation	Sample Date	Depth Interval (ft bgs)	Chloride Concentration (mg/kg) ^a
Oil Conserva	500		
SBW-1	09/28/2010	0-0.5	15,000
SBW-2	09/28/2010	0-0.5	12,000

Bold indicates concentrations that exceed the applicable standard.

^aAll samples analyzed by EPA method 300.0.

ft bgs = Feet below ground surface

mg/kg = Milligrams per kilogram

Attachment 2

Laboratory Report



COVER LETTER

Tuesday, October 12, 2010

Mike McVey Daniel B. Stephens & Assoc. 6020 Academy NE Suite 100 Albuquerque, NM 87109

TEL: (505) 822-9400 FAX: (505) 822-8877

RE: Salty Dog

Dear Mike McVey:

Order No.: 1009C55

Hall Environmental Analysis Laboratory, Inc. received 2 sample(s) on 9/29/2010 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. Below is a list of our accreditations. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites.

Reporting limits are determined by EPA methodology.

Please do not hesitate to contact HEAL for any additional information or clarifications.

Sincerely,

Andy Freeman, Laboratory Manager

NM Lab # NM9425 NM0901 AZ license # AZ0682 ORELAP Lab # NM100001 Texas Lab# T104704424-08-TX



4901 Hawkins NE ■ Suite D ■ Albuquerque, NM 87109 505.345.3975 ■ Fax 505.345.4107 www.hallenvironmental.com

CLIENT:	Daniel B. Stephens	& Assoc.		Ciien	t Sample II	D: SBW-1	· ···					
Lab Order:	1009c55	Collection Date: 9/28/2010 11:35:00 AM										
Project:	Salty Dog		Date Received: 9/29/2010									
Lad ID:	1009c55-01				Matri	x: SOIL						
Analyses		Result	PQL	Qual	Units	DF	Date Analyzed					
EPA METHOD	300.0: ANIONS	15000	750		ma/Ka	500	Analyst: SRM					

Date: 12-Oct-10

Hall Environmental Analysis Laboratory, Inc.

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Estimated value
- J Analyte detected below quantitation limits
- NC Non-Chlorinated
- PQL Practical Quantitation Limit

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits
- Page 1 of 2

		•				
CLIENT:	Daniel B. Stephens	& Assoc.		Client Sample I	D: SBW-2	
Lab Order:	1009c55			Collection Dat	e: 9/28/2010	0 11:40:00 AM
Project:	Salty Dog			Date Receive	d: 9/29/2010	0
Lab ID:	1009c55-02			Matri	x: SOIL	
Analyses		Result	PQL	Qual Units	DF	Date Analyzed
EPA METHOD	300.0: ANIONS			ويترك ويروب وبردائي الكناك المراجع		Analyst: SRM
Chloride		12000	750	mg/Kg	500	10/8/2010 5:00:57 AM

Date: 12-Oct-10

Hall Environmental Analysis Laboratory, Inc.

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Estimated value
- J Analyte detected below quantitation limits
- NC Non-Chlorinated
- PQL Practical Quantitation Limit

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

QA/QC SUMMARY REPORT

Client: Project:	Daniel B. Salty Dog	Stephens & A	Assoc.						Work	Order:	1009c55
Analyte		Result	Units	PQL	SPK Val SPK ref	%Rec Lo	owLimit Hi	ghLimit	%RPD	RPDLimit	Qual
Method: f Sample ID:	EPA Method 300.0 MB-24021	Anions	MBLK			Batch ID:	24021	Analys	is Date:	10/6/2010	6:11:06 PM
Chloride Sample ID:	LCS-24021	ND	mg/Kg LCS	1.5		Batch ID:	24021	Analys	is Date:	10/6/2010	6:28:31 PM
Chloride		13.76	mg/Kg	1.5	15 0	91.7	90	110			

Qualifiers:

- E Estimated value
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit

- H Holding times for preparation or analysis exceeded
- NC Non-Chlorinated
- R RPD outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Sample	e Receipt	Checklist		
Client Name DBS		Date Receiv	ed:	9/29/2010
Work Order Number 1009c55		Received b	y: AT	
Checklist completed by	D	Sample ID _{ate} 9/29/10	labels checked by:	MG. Initials
Matrix. Carrier name.	<u>Client dro</u>	pp-off		
Shipping container/cooler in good condition?	Yes 🗸	No	Not Present	
Custody seals intact on shipping container/cooler?	Yes	No	Not Present	Not Shipped 🗸
Custody seals intact on sample bottles?	Yes 🗸	V No	N/A 🔸	
Chain of custody present?	Yes 🗸	No No		
Chain of custody signed when relinquished and received?	Yes 🗸	No		
Chain of custody agrees with sample labels?	Yes 🗸	Na		
Samples in proper container/bottle?	Yes 🗸	No		
Sample containers intact?	Yes 🗸	No		
Sufficient sample volume for indicated test?	Yes 🗸	No		
All samples received within holding time?	Yes 🗸	No		Number of preserved
Water - VOA vials have zero headspace? No VOA vials subr	nitted 🗸	Yes	No	bottles checked for pH:
Water - Preservation labels on bottle and cap match?	Yes	No	N/A 🗸	
Water - pH acceptable upon receipt?	Yes	No	N/A 🗸	<2 >12 unless noted
Container/Temp Blank temperature?	6.1°	<6° C Acceptab	le	below
COMMENTS:		If given sufficient	time to cool.	

Chent contacted

Date contacted

Regarding

Person contacted

Contacted by

Comments:

Corrective Action

Chain-of-Custody Record				Turn-Around Time:						L			E,				× 1 ×		R.1-1-		
Client:	DBJ	+ A			🗆 Rush															7	
,				Project Name:																	
Mailing	Address	6020	Academy NE	1508.	0118	ر-*		490)1 H:	awki	ns N	F.				a NI	M 87	109			
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Phone #: (6, c) \$22 - \$400							Analysis Request														
email or Fax#: (505) 822 - 8877_			Project Mana	ger:														\square			
QA/QC Package:			Mevey			s (8021	(Gas or	as/Die					PO4.SC	PCB's			Ň				
Accreditation			Sampler: M ^{<} V <y< td=""><td>+ TMB</td><td>HdT +</td><td>15B (G</td><td>18.1)</td><td>04.1)</td><td>(HH)</td><td></td><td>03, NO₂,</td><td>\$ / 8082</td><td></td><td>A)</td><td>0</td><td></td><td></td><td>S S</td></y<>			+ TMB	HdT +	15B (G	18.1)	04.1)	(HH)		03, NO ₂ ,	\$ / 8082		A)	0			S S	
	(Type)			Sample inem	同道的研究		BE	ШШ	d 80	<u>8</u>	od 5	칭	etals	N.	ides	A)	<u>ې</u>	0 0			Σ
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type		втех + M1	BTEX + M1	TPH Metho	TPH (Meth	EDB (Meth	8310 (PNA	RCRA 8 Me	Anions (F,C	8081 Pestic	8260B (VO	8270 (Semi	E179 3.			Air Bubbles
9/28/10	1135	50:1	SBW-1	1402	None	1009655-1				Ì			_					X			
8/28/10	1140	5.1	JBW-2	1402	None	-2												X			\Box
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9/29/10	0750		2. 0. 7-7		hand	1 09/29/10	Rer	nark	5.												
Date:	i ime:	rteinquish	eu by:	Kecerved by:		Uate UTSU															

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.