Hamlet, Robert, EMNRD

From:	Andresen, Rebecca <rebecca.andresen@arcadis.com></rebecca.andresen@arcadis.com>
Sent:	Wednesday, July 17, 2019 8:24 AM
То:	Hamlet, Robert, EMNRD
Cc:	Venegas, Victoria, EMNRD; Bratcher, Mike, EMNRD; 'Jason Michelson'; Krehbiel, Brett
Subject:	[EXT] South Culebra Bluff Unit Well 3 - 2RP-3984
Attachments:	SCB 3 Closure Report.pdf

Mr. Hamlet,

Please find attached a Site Closure Request regarding NMOCD Case No. 2RP-3984. A release occurred at this location in January 2006. Excavation activities were completed between March and May 2006. In July 2006, documentation of final sampling and a request for closure were submitted to the NMOCD. Chevron acquired the lease for this well in October 2018. We are respectfully submitting the request for closure of Case No 2RP-3984.

Please let us know if you have questions.

Best Regards,

Rebecca Andresen, P.G. | Vice President | <u>rebecca.andresen@arcadis.com</u> Arcadis | 1100 Olive Way, Suite 800, Seattle, WA | 98101 | USA T. +1 206 726 4717 | M. +1 206 295 3273

Professional Registration / WA-2588 | GA-1589 | TN-4728

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Jason Michelson Project Manager Chevron Environmental Management Company 1500 Louisiana Street, #38116 Houston, Texas 77002 Work: 832-854-5601 Cell: 281-660-8564 jmichelson@chevron.com

July 17, 2019

New Mexico Oil Conservation Division, District II 811 S. First St Artesia, NM 88210

Re: South Culebra Bluff Unit 3 Closure Letter Inspection No. iCLB0601142847 2RP-3984 Eddy County, New Mexico

To whom it concerns,

Please find enclosed for your review a Closure Request for South Culebra Bluff Unit 3. A release was documented for this well in January 2006. Soil remediation and sampling was documented in a series of summary letters prepared by White Buffalo Environmental Services, Inc. (WBESI). In July 2006, documentation of final sampling and a request for closure were submitted to NMOCD. No response to the closure request can be located.

The attached Closure Letter was prepared by Arcadis U.S., Inc. (Arcadis) on behalf of Chevron Environmental Management Company. Copies of the remediation documentation prepared by WBESI are also attached. Chevron acquired the lease for this well in October 2018 and is respectfully requesting written NMOCD approval for closure of the open Order (2RP-3984) associated with this release.

Please do not hesitate to call Rebecca Andresen with Arcadis at 206-726-4717 or myself at 832-854-5601, should you have any questions.

Sincerely,

Jan Mila

Jason Michelson

Encl. South Culebra Bluff Unit 3- Closure Request South Culebra Bluff Unit 3 Correspondences

C.C. Brett Krehbiel, Arcadis



Mr. Rob Hamlet New Mexico Oil Conservation Division - District II Environmental Specialist 811 S. First St. Artesia, NM 88210

Subject:

Closure Request South Culebra Bluff Unit 3 Inspection No. iCLB0601142847 2RP-3984 Eddy County, New Mexico

Dear Mr. Hamlet:

On behalf of Chevron Environmental Management Company (CEMC), Arcadis U.S., Inc. (Arcadis) prepared this Closure Request for the South Culebra Bluff Unit 3 (Site), API # 30-015-22700, located in Eddy County, New Mexico. On January 11, 2006, NMOCD completed an inspection on the site, operated by Range Operating New Mexico Inc. (Range) at the time, who was issued a Letter of Violation(iCLB0601142847) January 11, 2006. It is assumed that this violation is associated with open Order Number 2RP-3984; documentation of the violation and remediation (summarized below) were located on the NMOCD online imaging site for this Order Number.

The purpose of the Report is to summarize the cleanup activities for the violation dated January 11, 2006, and to respectfully request written NMOCD approval for closure.

SITE DESCRIPTION AND BACKGROUND

The Site is located approximately 1.5 miles from Loving in Unit G, Section 23, Township 23S, Range 28E, Eddy County, New Mexico.

On January 11, 2006, during a routine inspection (iCLB0601142847) conducted by NMOCD, the inspector observed staining around the wellhead and standing fluids.

Arcadis U.S., Inc. 630 Plaza Drive Suite 100 Highlands Ranch Colorado 80129 Tel 720 344 3500 Fax 720 344 3535 www.arcadis.com

ENVIRONMENTAL

Date: July 17, 2019 Contact: Rebecca Andresen

Phone: 206-726-4717

Email: Rebecca.Andresen@arcadis .com

Our ref: B0049810.0000

New Mexico Oil Conservation Division II July 17, 2019

On January 27, 2006, White Buffalo Environmental Services (WBESI) submitted a Remediation Work Plan to NMOCD to address the staining violation. WBESI proposed to complete the site remediation according to NMOCD's standards. On January 30, 2006, NMOCD approved the Remediation Work Plan with limitations.

Between March and May 2006, multiple rounds of excavation were completed. Interim reports were submitted to NMOCD. Final samples were collected in May 2006, and submitted for laboratory analyses for benzene, toluene ethylbenzene, total xylenes, total petroleum, hydrocarbons, and chlorides. The summary report submitted to NMOCD (WBESI July 2006) reported that laboratory analytical results did not detect exceedances above the remediation limit.

WBESI submitted a report dated July 10, 2006 to conclude the remedial actions and request closure from NMOCD; no response to the closure request can be located. Copies of the Summary Reports are included as Attachment 1.

Chevron acquired the lease for this well in October 2018. Arcadis on behalf of CEMC, is respectfully requesting written NMOCD for closure of the violation from NMOCD on January 11, 2006, and associated Order Number 2RP-3984. If you have any questions or comments, please contact Rebecca Andresen at 206.726.4717 or by email at rebecca.andresen@arcadis.com.

Sincerely,

Arcadis U.S., Inc.

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Rebecca Andresen Vice President

Copies: Jason Michelson, Chevron/CEMC

Enclosures:

Attachments

1 South Culebra Bluff Unit 3 Reports and Correspondences

https://arcadiso365-my.sharepoint.com/personal/ashley_gibbard_arcadis-us_com/Documents/Documents/_DailyScans/LovingNM/SCB 3 Closure Report_V03.docx

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

Mark E. Fesmire, P.E.

Director

Page 5 of 171

Oil Conservation Division

BILL RICHARDSON Governor Joanna Prukop Cabinet Secretary

> **Mad Inspection Program** "Preserving the Integrity of Our Environment"

17-Jan-06

RANGE OPERATING NEW MEXICO INC

777 MAIN STREET SUITE 800 FT WORTH TX 76102

LETTER OF VIOLATION - Inspection

2RP-3984

Dear Operator:

The following inspection(s) indicate that the well, equipment, location or operational status of the well(s) failed to meet standards of the New Mexico Oil Conservation Division as described in the detail section below. To comply with standards imposed by Rules and Regulations of the Division, corrective action must be taken immediately and the situation brought into compliance. The detail section indicates preliminary findings and/or probable nature of the violation. This determination is based on an inspection of your well or facility by an inspector employed by the Oil Conservation Division on the date(s) indicated.

Please notify the proper district office of the Division, in writing, of the date corrective actions are scheduled to be made so that arrangements can be made to reinspect the well and/or facility.

			INSPECTIC	ON DETAIL	SECTION		
SOUTH CU Inspection Date	LEBRA BLU Type Inspectio		lo.003 Inspector	Violation?	G-23-23S-28E *Significant Non-Compliance?	30-015-22700-00- Corrective Action Due By:	00 Inspection No.
01/11/2006	Routine/Peri Violations Surface Leaks/S		Chris Beadle	Yes	No	2/10/2006	iCLB0601142847
Comments (on Inspection:	examine va that the wel fluids and s	reg Swindle, White Buf rious wells in this area f l had standing fluids an aturated soils. n is required. Submit a	for remediation d fresh soil coi	projects status. Driv atamination on location	ving by this well, obse on. Cellar has standir	rved ng
		OCD appro	ved remediation must b work plan is received, ation work or prior to ta	the NMOCD I	District 2 Office must	be notified 48 hours	prior to

Oil Conservation Division * 1301 W. Grand * Artesia, New Mexico 88210 Phone: 505-748-1283 * Fax: 505-748-9720 * http://www.emnrd.state.nm.us



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In the event that a satisfactory response is not received to this letter of direction by the "Corrective Action Due By:" date shown above, further enforcement will occur. Such enforcement may include this office applying to the Division for an order summoning you to a hearing before a Divison Examiner in Santa Fe to show cause why you should not be ordered to permanently plug and abandon this well. Such a hearing may result in imposition of CIVIL PENALTIES for your violation of OCD rules.

Sincerely,

Artesia OCD District Office

Note: Information in Detail Section comes directly from field inspector data entries - not all blanks will contain data. *Significant Non-Compliance events are reported directly to the EPA, Region VI, Dallas, Texas.

> Oil Conservation Division * 1301 W. Grand * Artesia, New Mexico 88210 Phone: 505-748-1283 * Fax: 505-748-9720 * http://www.emnid.state.nm.us



April 10, 2006

NMOCD District 2 Office Oil Conservation Division Chris Beadle 1301 West Grand Artesia, New Mexico 88210

RE: Letter of Violation for Range Operating New Mexico, Inc. Inspection, South Culebra Bluff (SCB) Unit No. 003

Chronology

On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range –Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained.

On March 29, 2006 after receiving notice from Tony Tucker, Range Resources Production Foreman Loving New Mexico Area., of completion of excavation and remediation; Ronnie Taylor of White Buffalo Environmental Services Inc arrived on site to perform final sampling. A sample was collected from the floor area of the spill site. The sample was immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The sample was analyzed for BTEX, TPH (NM 8015N), and Chloride content.

On April 10, 2006 the sample results were received from the laboratory. The results revealed that the BTEX, and TPH concentrations were above remediation limits. Further excavation will be performed and a future sampling date will be coordinated with you.

Please review the attached results and notify me via letter or email if you have any questions.

Sincerely,

Greg Swindle, President WBESI

Enclosures: Laboratory results Received by OCD: 9/16/2024 2:25:25 PM

ASK Laboratories, Inc.

Analytical Services Kwik!

ASK LABORATORIES, INC. 5935 GLENOAK LANE AMARILLO, TEXAS 79109

Attn: CUSTOMER SERVICES Phone: (806) 353-4425

WHITE BUFFALO ENVIRO. SERVICE 5425 BEN FICKLIN ROAD SAN ANGELO, TX 76904 Order #: 06-03-131 Date: 04/06/06 09:46 Work ID: FLOOR COMPOSITE Date Received: 03/31/06 Date Completed: 04/06/06

Attn: GREG SWINDLE

Purchase Order: RANGE SCB23 #3-B Invoice Number:

Client Code: WHITE BUFF

SAMPLE IDENTIFICATION

SampleSampleNumberDescription01FLOORCOMPOSITE

Sample Sample Number Description

Certified By ALAN D. KING

> 5935 Glenoak Lane Amarillo, Texas 79109 Telephone (806) 353-4425 Toll Free 1-800-423-9443 Facsimile (806) 352-6454

Please Note: Lability and Damages. ASK Laboratories, inc. Ilability and clients exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analysis. All claims, including those for negligence and any other cause whatscever shall be deemed waked unless made in writing and received by ASK Laboratories, inc. within thirty days of the applicable service. In no event shall ASK Laboratories, inc. be liable for incidental or consequential damages, including those without limitation, business interruption, loss of uses of uses of useful damages, including the client, its subsidiaries, atfiliates, or successors arising out of or related to the performance of services rendered by ASK Laboratories. Inc. regardless of whether such claim is based upon any of the preceding stated reasons or otherwise.

Received by OCD: 9/16/2024 2:25:25 PM

&16D

ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-03-131 04/06/06 09:46

ASK LABORATORIES, INC.

Page 2

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TEST RESULTS BY SAMPLE

Sample: 01A FLOOR COMPOSITE Collected: 03/29/06 09:20						
<u>Test Description</u> PERCENT SOLIDS - DRY WT.	<u>Result</u> 94.45	SOL	<u>Units</u> wt % solids	<u>Analyzed</u> 03/31/06	<u>By</u> BJP	
CHLORIDE ON SOLIDS	6260	100	mg/kg	03/31/06	BNH	
Total Pet. Hydrocarbons						
TPH C6-C12 - GRO	<78.7	78.7	mg/kg	04/05/06	BNH	
TPH C12-C28 - DRO	5100	78.7	mg/kg	04/05/06	BNH	
TPH C28-C35	982	78.7	mg/kg	04/05/06	BNH	
BTEX		٨				
BENZENE	<0.017	0.017	mg/kg	04/03/06	KDJ	
TOLUENE	<0.017	0.017	mg/kg	04/03/06	KDJ	
ETHYLBENZENE	<0.017	0.017	mg/kg	04/03/06	KDJ	
XYLENE	<0.017	0.017	mg/kg	04/03/06	KDJ	
Surrogates						
BROMOFLUOROBENZENE	109	Min: 80	Max:	120		

5935 Glenoak Lane Amarillo, Texas 79109 Telephone (806) 353-4425 Toll Free 1-800-423-9443 Facsimile (806) 352-6454

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ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-03-131 04/06/06 09:46	ASK	LABORAI	CORIES, INC	•		Page 3
			QA/QC INFO	RMATION		
	LCS	MS	MSD	RPD	BLANK	
MTBE	100%	107%	106%	0.4%	bdl	
BENZENE	99%	95%	93%	1.6%	bdl	
TOLUENE	96%	90%	91%	1.1%	bdl	
ETHYLBENZENE	99%	95%	96%	1.0%	bdl	
O-XYLENE	100%	93%	94%	0.8%	bdl	
m,p-XYLENES	100%	97%	978	0.0%	bdl	
METHOD 8015	LCS	MS	MSD	RPD	BLAN	IK
ТРН	95%	94%	92%	2.3%	bdl	. .
COMPOUND	RPD	SPIKE	RECOVERY	QC RECOV	VERY BLA	NK
CHLORIDE	0.9%		91%	94%	bd	11

bdl = below detectable levels

TEST METHODOLOGIES

TEST CODE : SOLIDS	TEST NAME : PERCENT SOLIDS FOR DRY WT CORRECTIONS	
	REFERENCE CLP PROTOCOL/ SECTION IV/ PART F	
TEST CODE : 8015N	TEST NAME : TRPH-8015M (GRO, DRO, C28-35)	:
	METHOD 8015M GCFID GAS CHROMATOGRAPHY WITH FLAME- IONIZATION DETECTOR. SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.	•
TEST CODE : BTEX	TEST NAME : BTEX	
	METHOD 8260 GC/MS GAS CHROMATOGRAPHY WITH MASS- SELECTIVE DETECTOR. SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.	
TEST CODE : CL_SOL	TEST NAME : CHLORIDE ON SOLID	5935 Glenoak Lane Amarillo, Texas 79109 Telephono (2008) 353 4425
	METHOD 300.0 : ION CHROMATOGRAPHY METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES,	Telephone (806) 353-4425 Toll Free 1-800-423-9443 Facsimile (806) 352-6454
	METHOD 9056 ION CHROMATOGRAPHY SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.	

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Analytical Services Kwik!

5935 Glenoak Lane Amarillo, Texas 79109 Telephone: (806) 353-4425 Facsimile: (806) 352-6454

Chain of Custody Record

Work Order No. Client Name White Buffald Environmental Project I.D./Location Range Oper ating SCB 23 #3-B Address 5425 Ben Fucklin Rd San Angelo, X7 Telephone (325) 651-9054 Telephone 80 ROMME Taylor

Please note: Liability and Damages. ASK Laboratories liability and clients exclusive remedy for any claim arising whither based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims, including those for negligence and other cause whatsoever shall be deemed walved unless made in writing and received by ASK Laboratories within thiny days of the applicable service, in no event shall ASK Laboratories be liable for incidental or consequential damages, including without imhtation, business interruptions, loss of use, or loss of profits incurred by the client, its subsidiaries, affiliates, or successors fraining out of or related to the preceding stated upon any of the preceding stated reasons or otherwise.



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CHAIN OF CUSTODY	White Buffalo Environmental Services, Inc. 5425 Ben Ficklin Road San Angelo, Texas 76904 Phone: 325-651-9054 Fax: 325-651-2125	
CHAIN	White Buffalo Er 5425 Ben Fickli Phone: 325	

Client (Name): Address:		Range	Je				Project (Name): SDUTH CULLED rai Bluff 23 # 3-B	e): S	Ith	νa	uleb	ra	Blu	ff 23	#3-B
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Telephone:									2						
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NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON Governor Joanna Prukop Cabinet Secretary Mark E. Fesmire, P.E. Director Oil Conservation Division

Range Operating New Mexico, Inc. 777 Main Street, Suite 800 Fort Worth, TX 76102 January 30, 2006

REMEDIATION WORK PLAN CONDITIONS OF APPROVAL - SOUTH CULEBRA BLUFF UNIT NO. 3

Dear Operator:

A review of the remediation work plan submitted on January 27, 2006, by White Buffalo Environmental Services, Inc., for the South Culebra Bluff Unit #3 (30-015-22700) has been completed by this office. Conditions for approval are as follows:

- Highly Contaminated/Saturated Soils must be remediated by excavating to the maximum depth and horizontal extent practicable until a representative sample from the walls and bottom of the excavation is below the contaminant specific remediation level. Upon reaching this limit samples should be taken from the walls and bottom of the excavation to determine the remaining levels of soil contaminants. All soils removed from the location must be documented as to contaminants in the soils, contaminant levels, method of determining contaminant levels and disposition of the soils (OCD approved landfarm, centralized site, etc.).
 - Highly contaminated/saturated soils are defined as those soils which contain a free liquid phase or exhibit gross staining.
- Unsaturated Contaminated Soils may be excavated or may be remediated by treatment of soil in place, until a representative sample is below the contaminant specific remediation level. One time applications of contaminated soils may be landfarmed on location by spreading the soil in an approximately six inch lifts within a bermed area. Only soils which do not contain free liquids can be landfarmed. The soils should be disced regularly to enhance biodegradation of the contaminants. If necessary and upon approval by OCD, moisture and nutrients may be added to the soil to enhance aerobic biodegradation. Due to the site ranking score for this location, this is considered to be a high risk area and an impermeable liner is required to prevent leaching of contaminants into the underlying soil. Landfarming sites that will receive soils from more than one location are considered centralized sites and must be approved separately by the OCD prior to operation. All soils removed from the location must be documented as to contaminants in the soils, contaminant levels, method of determining contaminant levels and disposition of the soils (OCD approved landfarm, centralized site, etc.).
 - Unsaturated contaminated soils are defined as soils which are not highly contaminated/saturated but contain benzene, toluene, ethylbenzene and xylenes (BTEX) and total petroleum hydrocarbons (TPH) or other potential fresh water contaminants unique to the leak, spill or release (e.g. chlorides).
- Contaminated soils requiring remediation should be remediated so that residual contaminant concentrations are below the recommended soil remediation action level. Chloride levels should be remediated to naturally occurring background levels. If soil action levels cannot practicably be attained, a detailed evaluation of risk may be performed and provided in writing to OCD for approval showing that the remaining contaminants will not pose a threat to present or foreseeable beneficial use of fresh water, public health and the environment.

Oil Conservation Division * 1301 W Grand * Artesia, New Mexico 88210 Phone: (505) 748-1283 * Fax (505) 748-9720 * <u>http://www.emnrd.state.nm.us</u> • Once the "most cost effective means of disposal or onsite bioremediation" has been determined, as outlined in the remediation work plan, a supplement to the remediation work plan describing the method of disposal or bioremediation must be submitted to the OCD District 2 Office for approval.

م الديد من أو مُدْمَد من المراجع

- If ground water is encountered during the soil/waste characterization, excavation or remediation of the impacted soils, a sample should be obtained to assess the potential impact on ground water quality and the OCD District 2 Office should be notified immediately.
- Notify OCD District 2 Office 24 hours prior to conducting work by Range Operating New Mexico, Inc., contractors or sub-contractors that is intended to excavate, wash, move or disturb (such as in tilling, blading, etc.) soils or contaminated materials for the purpose of remediation, or hauling any soils or contaminated materials into or out of the location covered under this remediation work plan. This notification is to ensure NMOCD personnel are able to monitor compliance with approved remediation work plans as required by the New Mexico Administrative Code. Therefore, if a reasonable schedule of work cannot be provided then a separate notification that work is to resume is required if work ceases at the location for more than 5 days.
- Notify OCD District 2 Office 24 hours prior to obtaining samples where analysis of samples will be submitted to OCD. ALL final delineation sample results must be submitted to the OCD whether or not the OCD actually witnesses those samples being taken.
- Upon termination of any required remedial actions, the area of a leak, spill or release may be closed, after obtaining approval for the closure from the OCD District 2 office, by backfilling any excavated areas, contouring to provide drainage, revegetating the area or other OCD approved methods. Upon completion of remedial activities a final report summarizing all actions taken to mitigate environmental damage related to the leak, spill or release will be provided to OCD for approval.

Acceptance of the remediation work plan 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 reports and work plans does not relieve the operator of responsibility for compliance with any other federal, state or local laws and/or regulations.

NMOCD District 2 Contact Person: Chris Beadle, Office: (505) 748-1283 x107 / Cell: (505) 626-0831 / Fax: (505) 748-9720 / E-mail: Chris.Beadle@state.nm.us

Thank you for your prompt attention to this matter and your efforts in helping to protect our environment and the infrastructure of the oil and gas industry.

Sincerely,

Artesia OCD District Office

cc: Greg Swindle, WBSEI (unsigned copy via e-mail)

January 27, 2006

NMOCD District 2 Office Oil Conservation Division Chris Beadle 1301 West Grand Artesia, New Mexico 88210

RE: Range Operating New Mexico, Inc. Inspection, South Culebra Bluff (SCB) Unit No. 003

Chronology

On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range –Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained. WBESI uses the attached information and metrics sheet for summarizing the remediation requirements for this site.

The following is an initial "Remediation Work Plan" for this site:

South Culebra Bluff (SCB) Unit No.003

General site characteristics Depth to Ground Water: 52' Wellhead Protection Area: 1000 yards to closest well Distance to Nearest Surface Water Body: 5,250' Site ranking score 10

Soil remediation action levels Highly Contaminated / Saturated Soils Benzene 10 ppm, BTEX 50 ppm, TPH 1000 ppm Soil remediation methods Excavation and disposal (or alternative approved onsite remediation) Planned analytical testing BTEX, TPH, Chlorides on soil

Work Plan

- Excavate until limits are obtained in a vertical and horizontal direction.
- Sample site for above parameters.

- Determine quantity of spoils removed from the excavated area.
- Determine most cost effective means of disposal or onsite bioremediation in accordance with NMOCD "Guidelines for Remediation of Leaks, Spills, and Releases".
- Contact NMOCD to set up sampling and post remediation inspection for February 9, 2006.
- Review analytical results.
- Backfill excavation if limits have been achieved or continue excavation.
- Sampling will be per NMOCD guidance including all walls and floor of the excavation.
- A final report will be issued on behalf of Range to the NMOCD documenting all final activities.
- A final letter of concurrence and closure will be issued by NMOCD if all guidelines have been achieved.

For further questions or comments please contact White Buffalo Environmental Services, Inc. at (325) 651-9054.

Greg Swindle, President WBESI

Enclosures:

Information and Metrics sheet USGS Map Aerial Photo Site Photographs

RANGE OPERATING NEW MEXICO, INC

Information	and	Metrics
	anu	IVICUIUS

		Information	and Metrics					
Incident Date: January 11	, 2006		NMOCD Notifie	d: January	/ 11, 2006			
Site: South Culebra Bluff	Unit No.00)3	Assigned Site Re	ference #	: iCLB0601142847			
Company: Range Operatin	ng New M	exico, Inc.			· · · · · · · · · · · · · · · · · · ·			
Street Address: 777 Main	<u> </u>				· · · · · · · · · · · · · · · · · · ·			
Mailing Address: 777 Ma								
City, State, Zip: Ft. Worth								
Representative: George T		· · · · · · · · · · · · · · · · · · ·			· · · · · · · · · · · · · · · · · · ·			
Representative Telephone		70-2601						
Fluid volume released (bb			Recovered (bbls)	: 0				
		OCD verbally within	24 hrs and submit form		hin 15 days.			
		pplies to unauthorize	d releases >500 mcf N	atural Gas)				
			form C-141 within 15 a	lays				
Leak, Spill, or Pit (LSP) N								
Source of contamination:				n ground				
Land Owner, i.e., BLM, S		ther: Johnny L. Re	eid					
LSP Dimensions: 60' X 50								
LSP Area: All around well	head							
Location of Reference Poi								
Location distance and dir	ection fro	m RP: NA						
Latitude: N 32° 17.588'								
Longitude: W 104° 3.282'								
Elevation above mean sea level: 2999' per USGS Map								
Location- Unit or 1/4 1/4: SE	E/4 NW/4	of Sec. 23	Unit Letter: M					
Location Section: 23								
Location- Township: 238								
Location Range: 28E		1						
					· · · ·			
Surface water body within	n 1000' ra	dius of site: No 3	394' per USGS Ma	ap				
Domestic water wells with				•	·			
Agricultural water wells w								
Depth from land surface t					ship to Pecos River			
Depth of contamination (I					F			
Depth to ground water (D		DtGW): 52'	•					
1. Ground water			Protection Area	3. Dista	nce to Surface Water Body			
If Depth to GW <50 feet: 20 point	nts	If <1000' from water			zontal feet: 20 points			
If Depth to GW 50 to 99 feet: 10 pointsfrom private domestic water source: 20 points200-100 horizontal feet: 10 points								
If >1000' from water source, or >200' If >1000' from water source, or >200' from private domestic water source: 0 points								
Ground Water Score = 10		Wellhead Protection	Area Score = 0	Surface W	vater Score = 0			
Site Rank $(1+2+3) = 10$				·				
	Total S	ite Ranking Score an	d Acceptable Concen	trations				
Parameter		>19	10-19		0-9			
Benzene		10 ppm	10 ppm		10 ppm			
BTEX		50 ppm	50 ppm	}	50 ppm			
ТРН	l	100 ppm	1,000 ppm		5,000 ppm			



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Photographs 1/11/06 SCB 23-3



NW to SE view

Photographs 1/11/06 SCB 23-3



East to West view

Photographs 1/11/06 SCB 23-3



South to North view.

May 5, 2006

NMOCD District 2 Office Oil Conservation Division Mike Bratcher 1301 West Grand Artesia, New Mexico 88210

RE: Letter of Violation for Range Operating New Mexico, Inc. Inspection, South Culebra Bluff (SCB) Unit No. 003

Chronology

On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range –Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained.

On March 29, 2006 after receiving notice from Tony Tucker, Range Resources Production Foreman Loving New Mexico Area., of completion of excavation and remediation; Ronnie Taylor of White Buffalo Environmental Services Inc arrived on site to perform final sampling. A sample was collected from the floor area of the spill site. The sample was immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The sample was analyzed for BTEX, TPH (NM 8015N), and Chloride content.

On April 10, 2006 the sample results were received from the laboratory. The results revealed that the BTEX, and TPH concentrations were above remediation limits. Further excavation will be performed and a future sampling date will be coordinated with you.

On April 13, 2006, Ronnie Taylor with WBESI performed additional sampling. The samples were immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The samples were analyzed for BTEX, TPH (NM 8015N), and Chloride content.

One April 19, 2006 the sample results were received from the laboratory. The results again revealed that the BTEX, and TPH concentrations were above remediation limits. Further excavation will be performed and a future sampling date will be coordinated with you.

Please review the attached results and notify me via letter or email if you have any questions.

Sincerely,

Greg Swindle, President WBESI

Enclosures:

Laboratory results Photographs Received by OCD: 9/16/2024 2:25:25 PM

ASK Laboratories, Inc.

Analytical Services Kwik!

ASK LABORATORIES, INC. 5935 GLENOAK LANE AMARILLO, TEXAS 79109

Attn: CUSTOMER SERVICES Phone: (806) 353-4425

WHITE BUFFALO ENVIRO. SERVICE 5425 BEN FICKLIN ROAD SAN ANGELO, TX 76904 Order #: 06-04-037 Date: 04/19/06 14:30 Work ID: SCB 23 #3B S1-S3 Date Received: 04/14/06 Date Completed: 04/19/06

Attn: GREG SWINDLE

Purchase Order: RANGE OPERATING, LOVING NM Invoice Number: C

Client Code: WHITE BUFF

SAMPLE IDENTIFICATION

Sample			Sar	nple		
Number		Į	Desci	<u>ription</u>		
01	SCB	23	#3B	S1		
02	SCB	23	#3B	S2		

SampleSampleNumberDescription03SCB 23 #3B S3

Certified

ALAN D. KING

5935 Glenoak Lane Amarilio, Texas 79109 Telephone (806) 353-4425 Toll Free 1-800-423-9443 Facsimile (806) 352-6454

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ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-04-037 04/19/06 14:30	ASK LABORATORIES	, INC.		Page 2	
	TEST RESULTS	BY SAMPLE			
Sample: 01A SCB 23 #3B S1	Col	lected: 04/1	3/06 09:15		
Test Description	Result	SQL	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	94.84		wt % solids	04/17/06	BJP
CHLORIDE ON SOLIDS	4390	100	mg/kg	04/18/06	BNH
Total Pet. Hydrocarbons		. '			
TPH C6-C12 - GRO	<33.5	33.5	mg/kg	04/18/06	BNH
TPH C12-C28 - DRO	2580	33.5	mg/kg	04/18/06	BNH
TPH C28-C35	629	33.5	mg/kg	04/18/06	BNH
BTEX					
BENZENE	<0.021	0.021	mg/kg	04/17/06	KDJ
TOLUENE	<0.021	0.021	mg/kg	04/17/06	KDJ
ETHYLBENZENE	<0.021	0.021	mg/kg	04/17/06	KDJ
XYLENE	0.046	0.021	mg/kg	04/17/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	99	Min: 80	Max:	120	

Sample: 02A SCB 23 #3B S2	Collected: 04/13/06 09:15						
Test Description PERCENT SOLIDS - DRY WT.	<u>Result</u> 97.99	SQL	<u>Units</u> wt % solids	<u>Analyzed</u> <u>By</u> 04/17/06 BJP			
CHLORIDE ON SOLIDS	7360	100	mg/kg	04/18/06 BNH			
Total Pet. Hydrocarbons							
TPH C6-C12 - GRO	<32.7	32.7	mg/kg	04/18/06 BNH			
TPH C12-C28 - DRO	999	32.7	mg/kg	04/18/06 BNH			
TPH C28-C35	240	32.7	mg/kg	04/18/06 BNH			
BTEX							
BENZENE	<0.018	0.018	mg/kg	04/17/06 KDJ			
TOLUENE	<0.018	0.018	mg/kg	04/17/06 ₅₉₃ 5 Bienoak Lane			
ETHYLBENZENE	<0.018	0.018	mg/kg	04/17/Afnarill& PTexas 79109			
XYLENE	<0.018	0.018	mg/kg	04/176160160ne 1(8006) 353-4425			
Surrogates				Toll Free 1-800-423-9443			
BROMOFLUOROBENZENE	102	Min: 80	Max:	120 Facsimile (806) 352-6454			

Please Note: Liability and Damages, ASK Laboratories, Inc. liability and clients exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analysis. All claims, including those for negligence and any other cause whatboever shall be deemed waived unless made in writing and received by ASK Laboratories. Inc. within thirty days of the applicable services. In no event shall ASK Laboratories, inc. be liable for incidental or consequential damages, including those without limitation, business interruption, loss of use, or loss of profits incurred by the client, its subsidiaries, affiliates, or successors arising out of or related to the performance of services rendered by ASK Laboratories. Inc. equivalent of the performance of services rendered by ASK Laboratories. Inc. equivalent of the performance of services rendered by ASK Laboratories. Inc. equivalent of the performance of services rendered by ASK Laboratories. Inc. equivalent of the performance of services rendered by ASK Laboratories. Inc. equivalent of the performance of services rendered by ASK Laboratories. Inc. equivalent of the performance of services rendered by ASK Laboratories. Inc. equivalent of the performance of services rendered by ASK Laboratories. Inc. equivalent of the performance of services rendered by ASK Laboratories. Inc. equivalent of the performance of services rendered by ASK Laboratories.

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ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-04-037 04/19/06 14:30	ASK LABORATORIE:	S, INC.		Page 3	
	TEST RESULTS	BY SAMPLE			
Sample: 03A SCB 23 #3B S3	Col	llected: 04/1	3/06 09:15		
<u>Test Description</u> PERCENT SOLIDS - DRY WT.	<u>Result</u> 97.84	_SQL_	<u>Units</u> wt % solids	<u>Analyzed</u> 04/17/06	<u>By</u> BJP
CHLORIDE ON SOLIDS	10800	100	mg/kg	04/18/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<32.4	32.4	mg/kg	04/18/06	BNH
TPH C12-C28 - DRO	667	32.4	mg/kg	04/18/06	BNH
TPH C28-C35	146	32.4	mg/kg	04/18/06	BNH
BTEX					
BENZENE	<0.020	0.020	mg/kg	04/17/06	KDJ
TOLUENE	<0.020	0.020	mg/kg	04/17/06	KDJ
ETHYLBENZENE	<0.020	0.020	mg/kg	04/17/06	KDJ
XYLENE	<0.020	0.020	mg/kg	04/17/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	101	Min: 80	Max:	120	

QA/QC	INFORMATION
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	LCS	MS	MSD	RPD	BLANK	. :
MTBE	91%	93%	103%	10.7%	bdl	
BENZENE	97%	93%	93%	0.3%	bdl	
TOLUENE	89%	86%	85%	1.5%	bdl	
ETHYLBENZENE	92%	89%	89%	0.9%	bdl	
O-XYLENE	93%	88%	88%	0.8%	bdl	
m,p-XYLENES	89%	91%	90%	1.2%	bdl	
METHOD 8015	LCS	MS	MSD	RPD	BLAN	К
TPH	98%	798	76%	1.8%	bdl	
						5935 Glenoak Lane
COMPOUND	RPD	SPIKE F	RECOVERY	QC RECO	VERY BLA	NK Amarillo, Texas 79109
CHLORIDE	0.3%	9	91%	95%	bd	1 Telephone (806) 353-4425
						Toll Free 1-800-423-9443
= below detectable	e levels					Facsimile (806) 352-6454

bdl = below detectable levels

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ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-04-037 04/19/06 14:30	ASK LABORATORIES, INC.	Page 4
	TEST METHODOLOGIES	
TEST CODE : SOLIDS	TEST NAME : PERCENT SOLIDS FOR DRY WT CO	ORRECTIONS
	REFERENCE CLP PROTOCOL/ SECTION IV/ PAR	T F
TEST CODE : 8015N	TEST NAME : TRPH-8015M (GRO, DRO, C28-35)
	METHOD 8015M GCFID GAS CHROMATOGRAPHY IONIZATION DETECTOR. SW-846 TEST METHO EVALUATING SOLID WASTES.	
TEST CODE : BTEX	TEST NAME : BTEX	
	METHOD 8260 GC/MS GAS CHROMATOGRAPHY W SELECTIVE DETECTOR. SW-846 TEST METHOD EVALUATING SOLID WASTES.	
TEST CODE : CL_SOL	TEST NAME : CHLORIDE ON SOLID	
	METHOD 300.0 : ION CHROMATOGRAPHY METHODS FOR CHEMICAL ANALYSIS OF WATER 3	AND WASTES,
	METHOD 9056 TON CHROMATOGRAPHY	

METHOD 9056 ION CHROMATOGRAPHY SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.

> 5935 Glenoak Lane Amarillo, Texas 79109 Telephone (806) 353-4425 Toll Free 1-800-423-9443 Facsimile (806) 352-6454

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Chain of Custody Record

Work Order No. Client Name White By Stal n Firviron might a Project I.D. Acation Rewae Over this No. A wing NM. Address SH35 Box Ficklin Nd Sou Angelon Telephone 325 051-9054 Sampled By Konnie aylor

1067

Please note: Liability and Damages. ASK Laboratories liability and clients exclusive remedy for any claim arising withree based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims, including those for negligence and other cause whatsoever shall be deemed waitvod unless made in writing and received by ASK Laboratories within thirty days of the applicable service. In no event shall ASK Laboratories within thirty days of the applicable service. In no event shall ASK Laboratories without finable for incidential or consequential damages, indurging without fimilation, business intarruptions, loss of use, or loss of profits incurred by the client, its subsidiaries, affiliates, or successors arising out of or related to the performance of services rendered by ASK Laboratories, regardless of whether such claims is based upon any of the precoding stated reasons or otherwise.

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Tamper Seal Comments Type of Container Additional Comments:	Relinquished by: (Signature)		Date		Time		ed by: (signature)		Properly Sealed Chilled to 40° F	> .			lf No, Explair If No. Temp.		
	mey per	a				 			Tamper Seal)	\mathbb{N}		Comments		
	e Dispo:	sal (\$30 per 1	00 grams)		<u> </u>	[]			Type of Container						
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Amarillo, Texas 79109 Telephone: (806) 353-4425 Facsimile: (806) 352-6454

5935 Glenoak Lane

ASK LABORATORIES, INC

Login Checklist

Order # 0604037

Shipping Method: ______ BUS____ Date/Time of Receipt: _____ 474 0705____

Cooler Check

	Ice in Cooler			Custody Seal			ป	
Shipping Container			If No,	Pres	ent?	Int	act?	Tracking Number
~~ -	Yes	No	Temperature	Yes	No	Yes	No	
Core	X				X			
							·	
· ·····								

Note: If the temperature of a cooler/sample is above 6°C fill out NCR.

Custody Seals	s on Bottles Present:	Yes	No <u>×</u> No
-	If Yes, is it intact? If Not intact, fill out NCR	Yes	No
Condition of	Containers:		f .
	Loose Caps:	Yes	No <u>Y</u>
	If Yes, fill out NCR		
	Broken Containers:	Yes	۲ No
	If Yes, fill out NCR		
	tody Included:	Yes (No
	ecceipt of all containers listed and fill out laboratory boxes		
Acid Preserve	ed Samples: pH =2<br If No, fill out NCR	Yes	No_V/A
Base Preserve	ed Samples: pH>/=12 If No, fill out NCR	Yes	No
Coolers Unpa	cked/Checked by:	•••	Date: 4 -19
NCRs (y/n):_	$\underline{\mathcal{N}}$	Faxed Con	firmation (y/n):

5935 Glenoak Lane Amarillo, TX 79109

Site Photographs SCB 23-3 4-13-2006



Bratcher, Mike, EMNRD

From:	Greg Swindle [greg@wbesi.com]
Sent:	Friday, May 05, 2006 1:09 PM
То:	'Tony Tucker'; Bratcher, Mike, EMNRD
Cc:	'Linda Stiles'
Subject:	SCB 23-3 or SCB 3B
Attachments:	SCB 23-3 5-5-06.pdf

Tony and Mike,

Attached is a letter and sample analysis showing that the referenced site is still above remediation limits.

Tony, please continue excavation for one more time. Another 12-18 inches maybe will clear this site. If we do not achieve limits at that time way may need to research another form of closure.

Mike, please review that attached results. We will be contacting you at least 48 hours prior to the next sampling event. If you have any questions please don't hesitate to call.

If any of you need a hard copy of this let me know. A hard copy of all results, photographs, and complete documentation will be furnished to all in a bound final report upon obtaining closure limits.

Greg Swindle

President White Buffalo Environmental Services, Inc. 5425 Ben Ficklin Road San Angelo, Texas 76904 Phone (325) 651-9054 Fax (325) 651-2125 Cell (325) 895-0410

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From: Deepa Floyd [mailto:deepa@wbesi.com] Sent: Friday, May 05, 2006 1:52 PM To: Greg Swindle Subject: SCB 23-3

Deepa Floyd White Buffalo Environmental Services, Inc. 5425 Ben Ficklin Road San Angelo, TX 76904 Phone: (325) 651-9054 Fax: (325) 651-2125 deepa@wbesi.com SITE INVESTIGATION • PROPERTY EVALUATION • CONSULTING SERVICE • REMEDIATION • MONITORING • SOLID WASTE MANAGEMENT • EMERGENCY RESPONSE

WHITE BUFFALO ENVIRONMENTAL SERVICES

July 10, 2006

NMOCD District 2 Office Oil Conservation Division Mike Bratcher 1301 West Grand Artesia, New Mexico 88210 RECEIVED JUL 1 2 2006

RE: Letter of Violation for Range Operating New Mexico, Inc. Inspection, South Culebra Bluff (SCB) Unit No. 003

Chronology

★ On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range –Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained. The site was assessed for a formal work plan and specific site information obtained. See attachment #1

On March 29, 2006 after receiving notice from Tony Tucker, Range Resources Production Foreman Loving New Mexico Area., of completion of excavation and remediation; Ronnie Taylor of White Buffalo Environmental Services Inc arrived on site to perform final sampling. A sample was collected from the floor area of the spill site. The sample was immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The sample was analyzed for BTEX, TPH (NM 8015N), and Chloride content.

On April 10, 2006 the sample results were received from the laboratory. The results revealed that the BTEX, and TPH concentrations were above remediation limits. See attachment #2 for the results of this sampling.

On April 13, 2006 the site was again visited after further excavation. The results of this sampling was obtained and revealed again that limits were exceeded and further sampling would be required. See attachment #3 for the results of this sampling.

On May 17, 2006 the site was again visited after further sampling. The analytical results revealed that the limits were obtained and no further excavation was required. See attachment # 4 for these results.

Tony Tucker of Range was notified that the limits had been obtained and that site closure was now warranted. Tony utilized the services of several trucking firms in the Loving area to transport the spoils of the excavation to Controlled Recovery, Inc.; PO Box 388;

5425 BEN FICKLIN ROAD, SAN ANGELO, TEXAS 76904 • (325) 651-9054 • FAX (325) 651-2125 Working For A Better Environment Hobbs, New Mexico, 88241-0388 (CRI). CRI was the final disposal place of all of the contaminated soils numbering approximately 212 cubic yards based upon the Manifest enclosed in Attachment #5 of this letter.

Please consider this NOV action item complete and send Range Operating Company your concurrence of final closure on this NOV action item.

Please review the attached results and notify me via letter or email if you have any questions.

Sincerely,

Greg Swindle, President WBESI

Enclosures:

Attachment #1 Filed Remediation Work plan Attachment #2 03/29/06 Sampling Results and Documentation Attachment #3 04/13/06 Sampling Results and Documentation Attachment #4 05/17/06 Sampling Results and Documentation Attachment #5 Disposal Manifest.

January 27, 2006

NMOCD District 2 Office Oil Conservation Division Chris Beadle 1301 West Grand Artesia, New Mexico 88210

RE: Range Operating New Mexico, Inc. Inspection, South Culebra Bluff (SCB) Unit No. 003

Chronology

On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range –Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained. WBESI uses the attached information and metrics sheet for summarizing the remediation requirements for this site.

The following is an initial "Remediation Work Plan" for this site:

South Culebra Bluff (SCB) Unit No.003

General site characteristics

Depth to Ground Water: 52'

Wellhead Protection Area: 1000 yards to closest well Distance to Nearest Surface Water Body: 5,250' Site ranking score 10

Soil remediation action levels

Highly Contaminated / Saturated Soils

Benzene 10 ppm, BTEX 50 ppm, TPH 1000 ppm

Soil remediation methods

Excavation and disposal (or alternative approved onsite remediation)

Planned analytical testing

BTEX, TPH, Chlorides on soil

Work Plan

- Excavate until limits are obtained in a vertical and horizontal direction.
- Sample site for above parameters.

- Determine quantity of spoils removed from the excavated area.
- Determine most cost effective means of disposal or onsite bioremediation in accordance with NMOCD "Guidelines for Remediation of Leaks, Spills, and Releases".
- Contact NMOCD to set up sampling and post remediation inspection for February 9, 2006.
- Review analytical results.
- Backfill excavation if limits have been achieved or continue excavation.
- Sampling will be per NMOCD guidance including all walls and floor of the excavation.
- A final report will be issued on behalf of Range to the NMOCD documenting all final activities.
- A final letter of concurrence and closure will be issued by NMOCD if all guidelines have been achieved.

For further questions or comments please contact White Buffalo Environmental Services, Inc. at (325) 651-9054.

Greg Swindle, President WBESI

Enclosures:

Information and Metrics sheet USGS Map Aerial Photo Site Photographs
.

RANGE OPERATING NEW MEXICO, INC

		Information	and Metrics					
Incident Date: January 11.	2		NMOCD Notifie	d: January 1	1, 2006			
Site: South Culebra Bluff U	Unit No.0	03	Assigned Site Re	e ference #: i	CLB0601142847			
Company: Range Operatir								
Street Address: 777 Main								
Mailing Address: 777 Ma	in Street S	Suite 800						
City, State, Zip: Ft. Worth	n, TX 761	02	•					
Representative: George T								
Representative Telephone	: (817) 8	70-2601						
Fluid volume released (bb			Recovered (bbls)					
25 bbls:			24 hrs and submit form		n 15 days.			
<u></u>	(Also (d releases >500 mcf N					
Look Spill or Dit (ISD) N	James SC		orm C-141 within 15 a	lays				
Leak, Spill, or Pit (LSP) N			d damaina manta a					
Source of contamination:				i grouna	**** · · · ·			
Land Owner, i.e., BLM, S LSP Dimensions: 60'X 50		uner: Johnny L. Ko						
					· · · · · · · · · · · · · · · · · · ·			
LSP Area: All around well								
Location of Reference Poi					······································			
Location distance and dire	ection iro	M KP: NA		······				
Latitude: N 32° 17.588'					······································			
Longitude: W 104° 3.282'								
Elevation above mean sea	level: 29	99° per USGS Map						
Location- Unit or ¼ ¼: SE	E/4 NW/4	of Sec. 23	Unit Letter: M					
Location Section: 23								
Location- Township: 23S								
Location Range: 28E								
Cuufa aa uuqtaa hadu uuithin	10002 m	ding of sites No. 2	204' mon LISCS M					
Surface water body within Domestic water wells with			·	ар				
Agricultural water wells w Depth from land surface t					in to Doogo Divor			
		water (DG): 00 (estimated based up	on relations	ip to Pecos River			
Depth of contamination (I Depth to ground water (D		- D4CHD, 52'			·			
1. Ground water (D	G-DC=		rotection Area	2 Distan	ce to Surface Water Body			
If Depth to GW <50 feet: 20 point	ite	If <1000' from water			ntal feet: 20 points			
If Depth to GW 50 to 99 feet: 10		from private domestic points			izontal feet: 10 points			
If Depth to GW >100 feet: 0 point	nts	If >1000' from water from private domestic points		>1000 horizontal feet: 0 points				
			A rea Saare - 0	Surface Wat				
Ground Water Score = 10		Wellhead Protection	Alea Scole – 0		er Score = 0			
Ground Water Score = 10 Site Rank (1+2+3) = 10	<u></u>		···· ·	·····	er Score = 0			
Site Rank $(1+2+3) = 10$	Total S	ite Ranking Score an	d Acceptable Concen	trations				
Site Rank (1+2+3) = 10 Parameter	Total S	i ite Ranking Score an >19	d Acceptable Concen	trations	0-9			
Site Rank $(1+2+3) = 10$	Total S	ite Ranking Score an	d Acceptable Concen	trations				





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Photographs 1/11/06 SCB 23-3



NW to SE view

Photographs 1/11/06 SCB 23-3



East to West view

Photographs 1/11/06 SCB 23-3



South to North view.

April 10, 2006

NMOCD District 2 Office Oil Conservation Division Chris Beadle 1301 West Grand Artesia, New Mexico 88210

RE: Letter of Violation for Range Operating New Mexico, Inc. Inspection, South Culebra Bluff (SCB) Unit No. 003

Chronology

On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range –Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained.

On March 29, 2006 after receiving notice from Tony Tucker, Range Resources Production Foreman Loving New Mexico Area., of completion of excavation and remediation; Ronnie Taylor of White Buffalo Environmental Services Inc arrived on site to perform final sampling. A sample was collected from the floor area of the spill site. The sample was immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The sample was analyzed for BTEX, TPH (NM 8015N), and Chloride content.

On April 10, 2006 the sample results were received from the laboratory. The results revealed that the BTEX, and TPH concentrations were above remediation limits. Further excavation will be performed and a future sampling date will be coordinated with you.

Please review the attached results and notify me via letter or email if you have any questions.

Sincerely,

Greg Swindle, President WBESI

Enclosures: Laboratory results

Page 44 of 171

ASK Laboratories, Inc.

Analytical Services Kwik!

ASK LABORATORIES, INC. 5935 GLENOAK LANE AMARILLO, TEXAS 79109

Attn: CUSTOMER SERVICES Phone: (806) 353-4425

WHITE BUFFALO ENVIRO. SERVICE 5425 BEN FICKLIN ROAD SAN ANGELO, TX 76904

Order #: 06-03-131 Date: 04/06/06 09:46 Work ID: FLOOR COMPOSITE Date Received: 03/31/06 Date Completed: 04/06/06

Attn: GREG SWINDLE

Received by OCD: 9/16/2024 2:25:25 PM

Purchase Order: RANGE SCB23 #3-B/ Invoice Number:

Client Code: WHITE BUFF

SAMPLE IDENTIFICATION

Sample Sample Number Description 01 FLOOR COMPOSITE

Sample Sample Number Description

Certified By ALAN D. KING

> 5935 Glenoak Lane Amarillo, Texas 79109 Telephone (806) 353-4425 Toll Free 1-800-423-9443 Facsimile (806) 352-6454

Please Note: Liability and Damages. ASK Laboratories, Inc. liability and clients exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analysis. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories, inc. within thirty days of the applicable service. In no event shall ASK Laboratories, inc. be liable for incidental or consequential damages, including timitation, business interruption, loss of use, or loss of profile incurred by the client. Its subsidiaries, affiliates, or successors arising out of or related to the performance of services rendered by ASK Laboratories, inc. "Released to Imaging: 9/16/2024 2:26:49 PM"

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ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-03-131 04/06/06 09:46 ASK LABORATORIES, INC.

Page 2

TEST RESULTS BY SAMPLE

Sample: 01A FLOOR COMPOSITE	Co	llected: 03/2	9/06 09:20		
Test Description PERCENT SOLIDS - DRY WT.	<u>Result</u> 94.45	SQL	<u>Units</u> wt % solids	<u>Analyzed</u> 03/31/06	<u>By</u> BJP
CHLORIDE ON SOLIDS	6260	100	mg/kg	03/31/06	BNH
Total Pet. Hydrocarbons					1
TPH C6-C12 - GRO	<78.7	78.7	mg/kg	04/05/06	BNH
TPH C12-C28 - DRO	5100	78.7	mg/kg	04/05/06	BNH
TPH C28-C35	982	78.7	mg/kg	04/05/06	BNH
BTEX					
BENZENE	<0.017	0.017	mg/kg	04/03/06	KDJ
TOLUENE	<0.017	0.017	mg/kg	04/03/06	KDJ
ETHYLBENZENE	<0.017	0.017	mg/kg	04/03/06	KDJ
XYLENE	<0.017	0.017	mg/kg	04/03/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	109	Min: 80	Max:	120	

5935 Glenoak Lane Amarillo, Texas 79109 Telephone (806) 353-4425 Toll Free 1-800-423-9443 Facsimile (806) 352-6454

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ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-03-131 04/06/06 09:46	ASK	LABORA	TORIES, INC	•	Page 3
			QA/QC INFO	RMATION	
	LCS	MS	MSD	RPD	BLANK
MTBE	100%	107%	106%	0.4%	bdl
BENZENE	99%	95%	938	1.6%	bdl
TOLUENE	96%	90%	91%	1.1%	bdl
ETHYLBENZENE	99%	95%	96%	1.0%	bdl
O-XYLENE	100%	93%	94%	0.8%	bdl
m,p-XYLENES	100%	978	978	0.0%	bdl
METHOD 8015	LCS	MS	MSD	RPD	BLANK
TPH	95%	94%	92%	2.3%	bdl
COMPOUND	RPD	SPIKE	RECOVERY	QC RECO	VERY BLANK
CHLORIDE	0.9%		91%	94%	bdl

bdl = below detectable levels

TEST METHODOLOGIES

TEST CODE : SOLIDS	TEST NAME : PERCENT SOLIDS FOR DRY WT CORRECTIONS	
	REFERENCE CLP PROTOCOL/ SECTION IV/ PART F	
TEST CODE : 8015N	TEST NAME : TRPH-8015M (GRO, DRO, C28-35)	. :
	METHOD 8015M GCFID GAS CHROMATOGRAPHY WITH FLAME- IONIZATION DETECTOR. SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.	
TEST CODE : BTEX	TEST NAME : BTEX	
	METHOD 8260 GC/MS GAS CHROMATOGRAPHY WITH MASS- SELECTIVE DETECTOR. SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.	
TEST CODE : CL_SOL	TEST NAME : CHLORIDE ON SOLID	5935 Glenoak Lane Amarillo, Texas\79109 Telephone (806) 353-4425
	METHOD 300.0 : ION CHROMATOGRAPHY METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES,	Toll Free 1-800-423-9443 Facsimile (806) 352-6454
	METHOD 9056 ION CHROMATOGRAPHY SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.	

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ASK Laboratories Analytical Services Kwik! 5935 Glenoak Lane Amarilo, Texas 79109 Telephone: (806) 352-6454 Facsimile: (806) 352-6454	əmiT	6 9:20										A Care	murel (Disposal (530	le
SK L vnalytic: 5935 Gl Amarilic Telepho Facsimi	Date	3/29/06	***				3				2	antendisi Mapa	N C Partieller	Client Agrees to:	for sample	Client's Signature
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Page 47 of 171

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Client (Name): R QN Address: City, State, Zip: Telephone: Telephone: Fax: W.B.E.S. Date Time Lab No. Signature Sture O6- 06- 06- 06- 06- 06- 06- 06- 06- 06- 0

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Range New Mexico 3-29-06 Spill Cleanup Loving, Eddy County, New Mexico



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May 5, 2006

NMOCD District 2 Office Oil Conservation Division Mike Bratcher 1301 West Grand Artesia, New Mexico 88210

RE: Letter of Violation for Range Operating New Mexico, Inc. Inspection, South Culebra Bluff (SCB) Unit No. 003

Chronology

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On April 10, 2006 the sample results were received from the laboratory. The results revealed that the BTEX, and TPH concentrations were above remediation limits. Further excavation will be performed and a future sampling date will be coordinated with you.

On April 13, 2006, Ronnie Taylor with WBESI performed additional sampling. The samples were immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The samples were analyzed for BTEX, TPH (NM 8015N), and Chloride content.

One April 19, 2006 the sample results were received from the laboratory. The results again revealed that the BTEX, and TPH concentrations were above remediation limits. Further excavation will be performed and a future sampling date will be coordinated with you.

Please review the attached results and notify me via letter or email if you have any questions.

Sincerely,

 \leq

Greg Swindle, President WBESI

Enclosures: Laboratory results Photographs

Page 52 of 171

ASK Laboratories, Inc.

Analytical Services Kwik!

ASK LABORATORIES, INC. 5935 GLENOAK LANE AMARILLO, TEXAS 79109

Attn: CUSTOMER SERVICES Phone: (806) 353-4425

WHITE BUFFALO ENVIRO. SERVICE 5425 BEN FICKLIN ROAD SAN ANGELO, TX 76904 Order #: 06-04-037 Date: 04/19/06 14:30 Work ID: SCB 23 #3B S1-S3 Date Received: 04/14/06 Date Completed: 04/19/06

Attn: GREG SWINDLE

Purchase Order: RANGE OPERATING, LOVING NM Invoice Number:

Client Code: WHITE_BUFF

SAMPLE IDENTIFICATION

 Sample
 Sample

 Number
 Description

 01
 SCB
 23
 #3B
 S1

 02
 SCB
 23
 #3B
 S2

SampleSampleNumberDescription03SCB 23 #3B S3

Certified H ALAN D. KING

5935 Glenoak Lane Amarilio, Texas 79109 Telephone (806) 353-4425 Toll Free 1-800-423-9443 Facsimile (806) 352-6454

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ASK Laboratories, Inc.

Analytical Services Kwik!

Page 2

Order # 06-04-037 04/19/06 14:30

SCB 23 #3B S1

Sample: 01A

ASK LABORATORIES, INC.

TEST RESULTS BY SAMPLE

Collected: 04/13/06 09:15

<u>Test Description</u> PERCENT SOLIDS - DRY WT.	<u>Result</u> 94.84	SQL	<u>Units</u> wt % solids	<u>Analyzed</u> 04/17/06	<u>By</u> BJP
CHLORIDE ON SOLIDS	4390	100	mg/kg	04/18/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<33.5	33.5	mg/kg	04/18/06	BNH
TPH C12-C28 - DRO	2580	33.5	mg/kg	04/18/06	BNH
ТРН С28-С35	629	33.5	mg/kg	04/18/06	BNH
BTEX					
BENZENE	<0.021	0.021	mg/kg	04/17/06	KDJ
TOLUENE	<0.021	0.021	mg/kg	04/17/06	KDJ
ETHYLBENZENE	<0.021	0.021	mg/kg	04/17/06	KDJ
XYLENE	0.046	0.021	mg/kg	04/17/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	· 99	Min: 80	Max:	120	

Sample: 02A SCB 23 #3B S2 Collected: 04/13/06 09:15

<u>Test Description</u> PERCENT SOLIDS - DRY WT.	<u>Result</u> 97.99	SQL	<u>Units</u> wt % solids	Analyzed By 04/17/06 BJP
CHLORIDE ON SOLIDS	7360	100	mg/kg	04/18/06 BNH
Total Pet. Hydrocarbons				
TPH C6-C12 - GRO	<32.7	32.7	mg/kg	04/18/06 BNH
TPH C12-C28 - DRO	. 999	32.7	mg/kg	04/18/06 BNH
TPH C28-C35	240	32.7	mg/kg	04/18/06 BNH
			•	
BTEX		, #		
BENZENE	<0.018	0.018	mg/kg	04/17/06 KDJ
TOLUENE	<0.018	0.018	mg/kg	04/17/06593588 Enoak Lane
ETHYLBENZENE	<0.018	0.018	mg/kg	04/17/Amarilik PFexas 79109
XYLENE	<0.018	0.018	mg/kg	04/17 Jiele prome 1(3305) 353-4425
Surrogates				Toll Free 1-800-423-9443
BROMOFLUOROBENZENE	102	Min: 80	Max:	120 Facsimile (806) 352-6454

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ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-04-037 04/19/06 14:30	ASK LABORATORIE	S, INC.		Page 3	
	TEST RESULTS	BY SAMPLE			
Sample: 03A SCB 23 #3B S3	Co	llected: 04/1	3/06 09:15		
Test Description	Result	SQL	<u>Units</u>	Analyzed	<u>By</u>
PERCENT SOLIDS - DRY WT.	97.84		wt % solids	04/17/06	BJP
CHLORIDE ON SOLIDS .	10800	. 100	mg/kg	04/18/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<32.4	32.4	mg/kg	04/18/06	BNH
TPH C12-C28 - DRO	667	32.4	mg/kg	04/18/06	BNH
TPH C28-C35	146	32.4	mg/kg	04/18/06	BNH
BTEX					
BENZENE	<0.020	0.020	mg/kg	04/17/06	KDJ
TOLUENE	<0.020	0.020	mg/kg	04/17/06	KDJ
ETHYLBENZENE	<0.020	0.020	mg/kg	04/17/06	KDJ
XYLENE	<0.020	0.020	mg/kg	04/17/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	101	Min: 80	Max:	120	

QA/QC INFORMATION

	LCS	MS	MSD	RPD	BLANI	κ.	. • •
MTBE	91%	93%	103%	10.7%	bdl		
BENZENE	97%	93%	938	0.3%	bdl		
TOLUENE	89%	86%	85%	1.5%	bdl		
ETHYLBENZENE	92%	89%	89%	0.9%	bdl		· .
o-XYLENE	93%	88%	88%	0.8%	bdl		
m,p-XYLENES	89%	91%	90%	1.2%	bdl		
METHOD 8015	LCS	MS	MSD	RPD		BLANK	
TPH	988	79%	76%	1.8%	i	bdl	
				4			5935 Glenoak Lane
COMPOUND	RPD	SPIKE	RECOVERY	QC RECO	VERY	BLANK	Amarilio, Texas 79109
CHLORIDE	0.3%		91%	95%		bdl	Telephone (806) 353-4425
							Toli Free 1-800-423-9443

bdl = below detectable levels

Facsimile (806) 352-6454

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Order # 06-04-037

ASK Laboratories, Inc.

Analytical Services Kwik!

Page 4

04/19/06 14:30 TEST METHODOLOGIES TEST NAME : PERCENT SOLIDS FOR DRY WT CORRECTIONS TEST CODE : SOLIDS REFERENCE CLP PROTOCOL/ SECTION IV/ PART F TEST CODE : 8015N TEST NAME : TRPH-8015M (GRO, DRO, C28-35) METHOD 8015M GCFID GAS CHROMATOGRAPHY WITH FLAME-IONIZATION DETECTOR. SW-846 TEST METHODS FOR EVALUATING SOLID WASTES. TEST CODE : BTEX TEST NAME : BTEX METHOD 8260 GC/MS GAS CHROMATOGRAPHY WITH MASS-SW-846 TEST METHODS FOR SELECTIVE DETECTOR. EVALUATING SOLID WASTES. TEST CODE : CL SOL TEST NAME : CHLORIDE ON SOLID

ASK LABORATORIES, INC.

METHOD 300.0 : ION CHROMATOGRAPHY METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES,

METHOD 9056 ION CHROMATOGRAPHY SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.

> 5935 Glenoak Lane Amarillo, Texas 79109 Telephone (806) 353-4425 Toll Free 1-800-423-9443 Facsimile (806) 352-6454

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ed by OCD: 9/16/2024 2:2	5.45 F WI										-			Page 36 0
Please note: Liability and Damages. ASK Laboratories flability and clients exclusive remedy for any daim arising writher based in contract or tort, strall be limited to the amount paid by the client for the analyses. All claims, including those for negligence and other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories within thinty days of the applicable service. In no event shall ASK Laboratories within thinty days of the applicable service. In no event shall ASK Laboratories within thinty days of the applicable service. In no event shall ASK Laboratories within thinty days of the applicable service. In no event shall ASK Laboratories without fination. business intermplone, joss of use, or loss of induding without finated to the performance of services indexing to reconsect arising out of or related to the performance of services indexing to profits incurred by the client, its subsidiaries, affiliates, or successors arising out of or related to the performance of services indexing to profits incurred by the client, its subsidiaries is based upon any of the preceding stated reasons or otherwise.	Analysis Required Required Remarks Remarks	x x x alass	x x x -	× × × × ×								No If Yes, Amt. ¹ /2 '	If No. Jemp. Aufs. 7. 202. Comments	
40471	No. of Containers	1	1	1						-		l st	2	
Chain of Custody Record Work Order No. Client Name <u>White Bussel a Furison Manuer Hal</u> Project I.D./Location Reuge Puper History Address <u>S435 Ben Fricklin Address S435 northe Food Hardork</u> Address <u>S435 Ben Fricklin Ad Seu Angelon</u> Telephone <u>335) northe Food Hardork</u> Sampled By Rownie Forylor	Sample Description	SCR 23#36 SI	ScB 23 # 3B	ScB 23 #38	ŀ	1.360						Time Received by: (signature) Remarks: 1030 9.15 Headspace 1005 Arceived by: (signature) Headspace 10105 Received by: (signature) Property Sealed	Chilled to 40° F	Type of Container Additional Comments:
	Composite Grab	×	×	\times										
Ories Kwikl 8425 -6454	Matrix	Soil	1	Ŵ								Date Date Date Date Date		Pay for sample Disposal (\$30 per 100 grams) Client's Signature
SK Laboratorie Ialytical Services Kwikl 5935 Glenoak Lane Amarilo, Texas 79109 Telephone: (806) 353-4425 Facsimile: (806) 352-6454	∍mīT	91552									,	ter	Sample	isposal (\$30
ASK Laboratories Analytical Services Kwikl 5935 Glenoak Lane Amarilo, Texas 79109 Telephone: (806) 353-4425 Facsimile: (806) 352-6454	Đĩ6Ū	4-13-06										Relinquished by: [Signature) TOVL 1.1. Relinquished by: [Signature) Relinquished by: [Signature]	Client Agrees to: Accept Returned Sample	Pay for sample Dis Client's Signature .
Δ ~	# əlqme2	10	02	03	04	05	06	07	08	60	10	Relipduighed by Relinquished by Relinquished by	Client A Acce	Pay Clier

Login Checklist

Order #_____0604037

Shipping Method: <u>BUS</u> Date/Time of Receipt: <u>4-14 0705</u>

Cooler Check

		Ice i	n Cooler	Custody Seal							
Shipping Container		If No,			If No,		Pres	ent?	Intact?		Tracking Number
	Yes	No	Temperature	Yes	No	Yes	No				
Core	K				X						

Note: If the temperature of a cooler/sample is above 6°C fill out NCR.

Custody Seals on Bottles Present:	Yes	No_ <u>×</u>
If Yes, is it intact?	Yes	No
If Not intact, fill out NCR		
Condition of Containers:		,
Loose Caps:	Yes	No <u>Y</u>
If Yes, fill out NCR		
		\sim κ
Broken Containers:	Yes	No
If Yes, fill out NCR		
Chain of Custody Included:	Yes	No
If Yes, verify receipt of all containers listed a and Date COC and fill out laboratory boxes.	nd all required	fields are complete. Sign
Acid Preserved Samples: pH =2<br If No, fill out NCR	Yes	No
Base Preserved Samples: pH>/=12 If No, fill out NCR	Yes	No
Coolers Unpacked/Checked by:		Date: 4 -19
NCRs (y/n):	Faxed Conf	irmation (y/n):

5935 Glenoak Lane Amarillo, TX 79109

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Site Photographs SCB 23-3 4-13-2006



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ASK Laboratories, Inc.

Analytical Services Kwik!

ASK LABORATORIES, INC. 5935 GLENOAK LANE AMARILLO, TEXAS 79109

Attn: CUSTOMER SERVICES Phone: (806) 353-4425

WHITE BUFFALO ENVIRO. SERVICE 5425 BEN FICKLIN ROAD SAN ANGELO, TX 76904

Attn: GREG SWINDLE

Invoice Number:

Order #: 06-05-091 Date: 05/30/06 13:15 Work ID: RANGE SCB 23-3/S1 THRU S3 Date Received: 05/24/06 Date Completed: 05/30/06 Client Code: WHITE_BUFF

SAMPLE IDENTIFICATION

Sample		S	ample	
Number		Des	cription	
01	SCB	23-3	S1	
02	SCB	23-3	S2	

Sample		S	ample	9
<u>Number</u>		Des	cript	<u>ion</u>
03	SCB	23-3	S 3	

Certified By

Alan D. King

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<u>By</u> JAC

BNH

BNH BNH BNH

KDJ KDJ KDJ

ASK Laboratories, Inc.

Analytical Services Kwik!

Max: 120

Order # 06-05-091 05/30/06 13:15	ASK LABORATORIES,	INC.		Page 2
	TEST RESULTS H	BY SAMPLE		
Sample: 01A SCB 23-3 S1	Coll	lected: 05/2	2/06 10:40	
<u>Test Description</u> PERCENT SOLIDS DRY WEIGHT	<u>Result</u> 99.25	SQL	<u>Units</u> wt % solids	<u>Analyzed</u> 05/24/06
CHLORIDE ON SOLIDS	4900	5.0	mg/kg	05/25/06
Total Petroleum Hydrocarbons		•		
TPH C6-C12 - GRO	<29.8	29.8	mg/kg	05/26/06
TPH C12-C28 - DRO	132	29.8	mg/kg	05/26/06
TPH C28-C35	<29.8	29.8	mg/kg	05/26/06
BTEX				
BENZENE	<0.020	0.020	mg/kg	05/25/06
TOLUENE	<0.020	0.020	mg/kg	05/25/06
ETHYLBENZENE	<0.020	0.020	mg/kg	05/25/06
XYLENE	<0.020	0.020	mg/kg	05/25/06
Surrogates				

91

Min: 80

Sample: 02A SCB 23-3 S2

BROMOFLUOROBENZENE

Collected: 05/22/06 10:43

Test Description PERCENT SOLIDS DRY WEIGHT	<u>Result</u> 98.07	SOL	<u>Units</u> wt % solids	<u>Analyzed</u> By 05/24/06 JAC
CHLORIDE ON SOLIDS	4280	5.0	mg/kg	05/25/06 BNH
Total Petroleum Hydrocarbons				
TPH C6-C12 - GRO	<31.2	31.2	mg/kg	05/26/06 BNH
TPH C12-C28 - DRO	199	31.2	mg/kg	05/26/06 BNH
TPHC28-C35	<31.2	31.2	` mg/kg	05/26/06 BNH
BTEX				
BENZENE	<0.015	0.015	mg/kg	05/25/06593 5 Bie noak Lane
TOLUENE	<0.015	0.015	mg/kg	05/25/Amaril K DTexas 79109
ETHYLBENZENE	<0.015	0.015	mg/kg	05/2159.jéph6one K28006) 353-4425
XYLENE	<0.015	0.015	mg/kg	05/255%10F63ee 1KB900-423-9443
Surrogates				Facsimile (806) 352-6454
BROMOFLUOROBENZENE	95	Min: 80	Max:	120

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ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-05-091 05/30/06 13:15	ASK LABORATORIE	S, INC.		Page 3	
	TEST RESULTS	BY SAMPLE			
Sample: 03A SCB 23-3 S3	Co	llected: 05/2	2/06 10:45		
Test Description	Result	SQL	<u>Units</u>	<u>Analyzed</u>	By
PERCENT SOLIDS DRY WEIGHT	98.11		wt % solids	05/24/06	JAC
CHLORIDE ON SOLIDS	4440	5.0	mg/kg	05/25/06	BNH
Total Petroleum Hydrocarbons	;				
TPH C6-C12 - GRO	<30.8	30.8	mg/kg	05/26/06	BNH
TPH C12-C28 - DRO	179	30.8	mg/kg	05/26/06	BNH
TPH C28-C35	<30.8	30.8	mg/kg	05/26/06	BNH
BTEX					
BENZENE	<0.015	0.015	mg/kg	05/25/06	KDJ
TOLUENE	<0.015	0.015	mg/kg	05/25/06	KDJ
ETHYLBENZENE	<0.015	0.015	mg/kg	05/25/06	KDJ
XYLENE	<0.015	0.015	mg/kg	05/25/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	98	Min: 80	Max:	120	

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ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-05-091 05/30/06 13:15	ASK	LABORAT	ORIES, INC		Page 4
			QA/QC INFC	RMATION	
	LCS	MS	MSD	RPD	BLANK
BENZENE	103%	103%	109%	5.0%	bdl
TOLUENE	95%	90%	98%	7.4%	bdl
ETHYLBENZENE	101%	104%	113%	8.1%	bdl
m,p-XYLENES	103%	103%	1148	9.8%	bdl
O-XYLENE	99%	103%	116%	11.8%	bdl
TX1005	-LCS	MS	MSD	RPD	BLANK
TPH	106%	93%	84%	9.3%	bdl
COMPOUND	RPD	SPIKE 1	RECOVERY	QC RECOV	ERY BLANK
CHLORIDE	0.2%	:	91%	93%	bdl

bdl=below detectable levels

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ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-05-091 05/30/06 13:15

ASK LABORATORIES, INC.

TEST NAME : CHLORIDE ON SOLID

Page 5

TEST METHODOLOGIES

TEST CODE : SOLIDS

REFERENCE CLP PROTOCOL/ SECTION IV/ PART F

TEST CODE : 8015N TEST NAME : TRPH-8015M (GRO, DRO, C28-35)

METHOD 8015M GCFID GAS CHROMATOGRAPHY WITH FLAME-IONIZATION DETECTOR. SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.

TEST NAME : PERCENT SOLIDS FOR DRY WT CORRECTIONS

TEST CODE : BTEX TEST NAME : BTEX

METHOD 8260 GC/MS GAS CHROMATOGRAPHY WITH MASS-SELECTIVE DETECTOR. SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.

TEST CODE : CL SOL

METHOD 300.0 : ION CHROMATOGRAPHY METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES, EPA-600/4-79-020

METHOD 9056 ION CHROMATOGRAPHY SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.

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Received by OCD: 9/16/2024 2:2	5:25 P W	42		Page 64 of 1
Please note: Liability and Damages. ASK Laboratories liability and clients exclusive remedy for any claim artsing whither based in contract or tor, shall be limited to the amount paid by the client for the analyses. All claims, including those for megigenes and other cause withstover shall be deamed within thiny days of the applicable service. In no event shall be deamed within thiny days of the applicable service. In no event shall be deamed within thiny days of the applicable service. In no event shall be deamed within thiny days of the applicable service. In no event shall ASK Laboratories within theticon, business interruptions, loss of use, or successors prodifies lipcured by the client, its subsidiartes, affiliates, or successors proceeding stated reasons or otherwise.	Analysis Required XXX XXX XXX Remarks		No If Yes. Amt.	If No. Explain If No. Temp. <u>U.A.T. I(E</u> Comments
- 6	Containers	 ·		
stody Record alo Environmental klin kd. SanAngelo, Edylor			Remarks: Headspace	Properly Sealed Chilled to 40° F Tamper Seal Type of Contaiher Additional Comments:
Chain of Custody Record Work Order No. Glient Name White Buitffalo Environmie Project I.D./Location RQMGe Address 5425 Ben Ficklin Rd. SanAr Address 5425 Ben Ficklin Rd. SanAr Telephone (325) 651 9054 Sampled By Ronnie Taylor	Sample Description SCB 23-3 5/ SCB 23-3 52	CB23-3 53	UDA Received by listimatine	20 BUS Received by: Isignature
Work Clien Proje Addr Telep Samj		×		
			300	
Ories Kwik! 9 6454 6454	Xintem 1	>		er 100 grams)
SK Laboratorie 1alytical Services Kwikl 5935 Glenoak Lane Amarilo, Texas 79109 Telephone: (806) 352-6454 Facsimile: (806) 352-6454	9010:40	10:45		sample [530 p
ASK Laboratories Analytical Services Kwik! 5935 Glenoak Lane Amarilo, Texas 79109 Telephone: (806) 353-4425 Facsimile: (806) 352-6454	Date	>	The Difference	Relinquished by: [Signature]
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ASK LABORATORIES, INC

Login Checklist

Order # 0605093

Shipping Method: Bus

Date/Time of Receipt:___

5-24-06 B: Span

Cooler Check								
		Ice i	n Cooler	• •	Custo	dy Sea	al	
Shipping Container	[If No,	Pres	ent?	Int	act?	Tracking Number
	Yes	No	Temperature	Yes	No	Yes	No	
Cooler	X				X		·	828796

Note: If the temperature of a cooler/sample is above 6°C fill out NCR.

Custody Seals on Bottles Present:	Yes X	No
If Yes, is it intact?	Yes X	No No
If Not intact, fill out NCR		· .
Condition of Containers:		· · · · · · · · · · · · · · · · · · ·
Loose Caps:	Yes	No_ <u>X_</u>
If Yes, fill out NCR		
Broken Containers:	Yes	NoX
If Yes, fill out NCR	·····	
Chain of Custody Included: If Yes, verify receipt of all containers listed and Date COC and fill out laboratory boxes.	and all required	No I fields are complete. Sign v discremencies on NCP
		y aboropancies on NCIC
Acid Preserved Samples: pH =2<br If No, fill out NCR	Yes	No
Base Preserved Samples: pH>/=12 If No, fill out NCR	Yes	No
Coolers Unpacked/Checked by: 5.	ing	Date: 5-24-06
NCRs (y/n):	Faxed Cont	firmation (y/n):

5935 Glenoak Lane Amarillo, TX 79109



Range New Mexico 5-17-06 Spill Cleanup Loving, Eddy County, New Mexico



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Range New Mexico 5-17-06 Spill Cleanup Loving, Eddy County, New Mexico



		CONT	ROLLED RECOVER	Y, INC.		
		P.O. Box 3	888 • Hobbs, New Mexico 88	241-0388		
- 24			(505) 393-1079 www.crihobbs.com	,		
S.J.			www.chhobbs.com			
Bill to						
Address						
Company/Generato	r Rang	Ø				
Lease Name		¥3			<u></u>	
Trucking Company			/ehicle Number	Driver (Print)	Ray	
Date 3-29-		· · · · · · ·	Time F.			n. Dp.m.
	· · ·			<u> </u>	(a.i	p.m.
			Type of Material			•
Exempt		🖸 Tank I		Fluids		* <u>.</u>
Non-Exe	mpt	C117		O Other Materi	al	
C138		_ 🖸 Soils		List Descript	ion Below	
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·		<u> </u>	DESCRIPTION			
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	O Bbls.			nc		· · · · · · · · · · · · · · · · · · ·
Volume of Material		ut	Pard	nc	_	
Wash Out This statement applic	Bbls Call Or cable to exempt	pt waste only.	C After Hours		Debris Charge	
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Wash Out This statement applied represent and warrant	Bbls.	p t waste only. es are: generated	C After Hours	d production operati	Debris Charge	
Wash Out This statement applied represent and warrant Conservation and Rec	Bbls.	p t waste only. es are: generated	After Hours	d production operati	Debris Charge	
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Wash Out This statement applic represent and warran Conservation and Rec Agent Gisggature CRI Representative TANK BOTTOMS 1st Gauge	Bbls Call Or Cable to exempt that the wast over Act (RCR/ Mexage (Signature)	pt waste only. es are: generated A) Subtitle C Regu	□ After Hours from oil and gas exploration and lations; and not mixed with non BBLS Recei	d production operation ope	Debris Charge	Sourcə
Wash Out This statement applie represent and warran Conservation and Rec Agent Cisignature) CRI Representative TANK BOTTOMS 1st Gauge 2nd Gauge	Bbls Call Or Cable to exempt that the wast over Act (RCR/ Mexage (Signature)	pt waste only. es are: generated A) Subtitle C Regu	After Hours from oil and gas exploration and lations; and not mixed with non BBLS Recei Free Wa	d production operation ope	Debris Charge	Source %
Wash Out This statement applie represent and warran Conservation and Rec Agent Cisignature) CRI Representative TANK BOTTOMS 1st Gauge 2nd Gauge	Bbls Call Or Cable to exempt that the wast over Act (RCR/ Mexage (Signature)	pt waste only. es are: generated A) Subtitle C Regu	After Hours from oil and gas exploration and lations; and not mixed with non BBLS Recei Free Wa Total Recei	d production operation ope	Debris Charge	source % 5

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			bs, New Mexico 88241-	0388	
•••• Å ³)5) 393-1079 /.crihobbs.com		
- 4 - 4			.chilobbs.com		
Bill to	<u> </u>				ेन्द्
Address					· · · · · ·
Company/Generator	r Konge		· · · · ·		
_ease Name	SCB #:	3			
Frucking Company	findo's	Vehicle Nu	umber	Driver (Print) Rona	l, "
Date 3-29-6			Time 9:20		a.m.y p.m.
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## Bratcher, Mike, EMNRD

From:	Bratcher, Mike, EMNRD
Sent:	Tuesday, February 05, 2013 4:03 PM
То:	'Jerusha Rawlings'
Subject:	RE: Unresolved well compliance/spill data

Jerusha,

As we discussed, I believe the 2006 releases attributed to the Candelario #1 actually occurred at the battery for this SWD. The battery is located on the South Culebra Bluff #6 well site. While I was unable to locate any documentation that would allow me to close it out, I do not believe these releases should be of concern.

The South Culebra Bluff #4, I was able to locate documentation that will allow for this incident to be closed out.

The status of the remaining incidents is pretty much unknown. I was unable to locate any documentation that would allow for closure of any of them. The 1999 entry for the South Culebra Bluff 23 #11, I believe is a non-incident.

Hope this helps some.

Mike Bratcher NMOCD District 2 811 S. First Street Artesia, NM 88210 O: 575-748-1283 X108 C: 575-626-0857 F: 575-748-9720

From: Jerusha Rawlings [mailto:jrawlings@glenvironmental.com] Sent: Monday, January 28, 2013 2:58 PM To: Bratcher, Mike, EMNRD Subject: Unresolved well compliance/spill data

Mike,

Thanks for taking the time to look at these. The incidents I have questions about are listed below with the wells' API numbers.

Candelario #001 (30-015-26536)

• 10/6/2006 – a release of oil (all recovered) due to human error. No groundwater was affected, but no closure information was available from OCD online.

• 10/10/2006 – a release of oil (15 bbl unrecovered) due to human error. No groundwater was affected, but no closure information was available from OCD online.

South Culebra Bluff #004 (30-015-22931)

• 3/7/2009 – a release of produced water (10 bbl unrecovered) due to a fatigued check valve on the well head. According to OCD documents, immediate action was taken, including sampling and analysis of produced water. OCD requested a work plan for further delineation of all constituents of concern. No other information is available and the disposition of the affected area in unknown.

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## South Culebra Bluff #006 (30-015-23339)

• 7/15/2005 – a release of oil and produced water (20 bbl unrecovered) due to a "water dump valve malfunction on the heater treater dumping water to oil tank." The produced water and oil was contained inside the fenced berm area and recovered by a vacuum truck. The remaining fluids were spread with sand to soak up the oil, but it is not clear whether the sand was disposed of or left in place. During an inspection, it was noted that the north side of the tank battery was covered with fresh soil to an average depth of approximately 6 inches, but contaminated soils remain below the clean soils. A soil sample was taken, but the disposition of the case is unknown.

## South Culebra Bluff #003 (30-015-22700)

• 1/25/2011 – a release of produced fluids (40 bbl unrecovered, water/oil proportion unspecified) due to failure of a tank union. According to form C-141, the area affected was inside the firewalls of the tank battery. The disposition of the affected soil is unknown.

### South Culebra Bluff 23 #011 (30-015-26346)

• 7/21/1999 – Other than its listing under the "Complaints, Incidents and Spills" section of OCD's well information page, no other information was available.

• 8/21/2006 – a release of oil (5 bbl unrecovered) due to failure of a valve on the pump jack. According to form C-141, a vacuum truck was called immediately and recovered 10 bbl. Approximately 5 bbl soaked into ground. The disposition of this soil is unknown.

Regards,

Jerusha Rawlings, PhD



GL Environmental, Inc. (505) 508-2419 Albuquerque office (505) 385-9594 cell (505) 454-0830 Las Vegas office (505) 454-8093 fax

## Hamlet, Robert, EMNRD

From:	Hamlet, Robert, EMNRD
Sent:	Thursday, July 25, 2019 10:54 AM
То:	'Andresen, Rebecca'
Cc:	Venegas, Victoria, EMNRD; Bratcher, Mike, EMNRD; 'Jason Michelson'; Krehbiel, Brett
Subject:	RE: South Culebra Bluff Unit Well 3 - 2RP-3984
Attachments:	OCDFeesReleaseJuly12019 (004).pdf; NMOCD_FAQ announcement.pdf

## Rebecca,

As of July 1st, Application for administrative approval of a release notification and corrective action will require the operator to go to <u>https://wwwapps.emnrd.state.nm.us/OCD/OCDPermitting/Default.aspx</u> and provide payment for review of forms and/or documents.

Attached is a news release for Senate Bill 553 which establishes a fees schedule for the NMOCD. As of July 1st, the fees go into effect and the payment is live on the OCD website. In order to ease some of the transition, NMOCD has put a <u>FAQ announcement</u> on our website.

Thank you,

Robert J Hamlet State of New Mexico Energy, Minerals, and Natural Resources Oil Conservation Division 811 S. First St., Artesia NM 88210 (575) 840-5963 Robert.Hamlet@state.nm.us

From: Andresen, Rebecca <Rebecca.Andresen@arcadis.com>
Sent: Wednesday, July 17, 2019 8:24 AM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Cc: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; 'Jason Michelson' <JMichelson@chevron.com>; Krehbiel, Brett <Brett.Krehbiel@arcadis.com>
Subject: [EXT] South Culebra Bluff Unit Well 3 - 2RP-3984

Mr. Hamlet,

Please find attached a Site Closure Request regarding NMOCD Case No. 2RP-3984. A release occurred at this location in January 2006. Excavation activities were completed between March and May 2006. In July 2006, documentation of final sampling and a request for closure were submitted to the NMOCD. Chevron acquired the lease for this well in October 2018. We are respectfully submitting the request for closure of Case No 2RP-3984.

Please let us know if you have questions.

Best Regards,

Rebecca Andresen, P.G. | Vice President | <u>rebecca.andresen@arcadis.com</u> Arcadis | 1100 Olive Way, Suite 800, Seattle, WA | 98101 | USA T. +1 206 726 4717 | M. +1 206 295 3273

Professional Registration / WA-2588 | GA-1589 | TN-4728

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#### Received by OCD: 8/20/2019 3:59:44 PM Received by OCD: 9/16/2024 2:25:25 PM



Jason Michelson Project Manager Chevron Environmental Management Company 1500 Louisiana Street, #38116 Houston, Texas 77002 Work: 832-854-5601 Cell: 281-660-8564 jmichelson@chevron.com

August 19, 2019

New Mexico Oil Conservation Division, District II 811 S. First St Artesia, NM 88210

Re: South Culebra Bluff Unit 3 Closure Letter Inspection No. iCLB0601142847 2RP-3984 Eddy County, New Mexico

To whom it concerns,

Please find enclosed for your review a Closure Request for South Culebra Bluff Unit 3. A release was documented for this well in January 2006. Soil remediation and sampling was documented in a series of summary letters prepared by White Buffalo Environmental Services, Inc. (WBESI). In July 2006, documentation of final sampling and a request for closure were submitted to NMOCD. No response to the closure request can be located.

The attached Closure Letter was prepared by Arcadis U.S., Inc. (Arcadis) on behalf of Chevron Environmental Management Company. Copies of the remediation documentation prepared by WBESI are also attached. Chevron acquired the lease for this well in October 2018 and is respectfully requesting written NMOCD approval for closure of the open Order (2RP-3984) associated with this release. A C-141 Closure Form is attached.

Please do not hesitate to call Rebecca Andresen with Arcadis at 206-726-4717 or myself at 832-854-5601, should you have any questions.

Sincerely,

Jan Mil

Jason Michelson

Encl. South Culebra Bluff Unit 3- Closure Request South Culebra Bluff Unit 3 Correspondences

C.C. Brett Krehbiel, Arcadis



Mr. Rob Hamlet New Mexico Oil Conservation Division - District II **Environmental Specialist** 811 S. First St. Artesia, NM 88210

Subject:

**Closure Request** South Culebra Bluff Unit 3 Inspection No. iCLB0601142847 2RP-3984 Eddy County, New Mexico

Dear Mr. Hamlet:

On behalf of Chevron Environmental Management Company (CEMC), Arcadis U.S., Inc. (Arcadis) prepared this Closure Request for the South Culebra Bluff Unit 3 (Site), API # 30-015-22700, located in Eddy County, New Mexico. On January 11, 2006, NMOCD completed an inspection on the site, operated by Range Operating New Mexico Inc. (Range) at the time, who was issued a Letter of Violation (iCLB0601142847) dated January 11, 2006. It is assumed that this violation is associated with open Order Number 2RP-3984; documentation of the violation and remediation (summarized below) were located on the NMOCD online imaging site for this Order Number.

The purpose of the Report is to summarize the cleanup activities for the violation dated January 11, 2006, and to respectfully request written NMOCD approval for closure. A C-141 Closure Form is included as Attachment 1.

## SITE DESCRIPTION AND BACKGROUND

The Site is located approximately 1.5 miles from Loving in Unit G, Section 23, Township 23S, Range 28E, Eddy County, New Mexico.

On January 11, 2006, during a routine inspection (iCLB0601142847) conducted by NMOCD, the inspector observed staining around the wellhead and standing fluids.

Arcadis U.S., Inc. 630 Plaza Drive Suite 100 Highlands Ranch Colorado 80129 Tel 720 344 3500 Fax 720 344 3535 www.arcadis.com

ENVIRONMENTAL

Date: August 20, 2019

Contact: Rebecca Andresen

Phone: 206-726-4717

Email: Rebecca.Andresen@arcadis .com

Our ref: B0049810.0000 New Mexico Oil Conservation Division II August 20, 2019

On January 27, 2006, White Buffalo Environmental Services (WBESI) submitted a Remediation Work Plan to NMOCD to address the staining violation. WBESI proposed to complete the site remediation according to NMOCD's standards. On January 30, 2006, NMOCD approved the Remediation Work Plan with limitations.

Between March and May 2006, multiple rounds of excavation were completed. Interim reports were submitted to NMOCD. Final samples were collected in May 2006, and submitted for laboratory analyses for benzene, toluene ethylbenzene, total xylenes, total petroleum, hydrocarbons, and chlorides. The summary report submitted to NMOCD (WBESI July 2006) reported that laboratory analytical results did not detect exceedances above the remediation limit.

WBESI submitted a report dated July 10, 2006 to conclude the remedial actions and request closure from NMOCD; no response to the closure request can be located. Copies of the Summary Reports are included as Attachment 2.

Chevron acquired the lease for this well in October 2018. Arcadis on behalf of CEMC, is respectfully requesting written NMOCD for closure of the violation from NMOCD on January 11, 2006, and associated Order Number 2RP-3984. If you have any questions or comments, please contact Rebecca Andresen at 206.726.4717 or by email at rebecca.andresen@arcadis.com.

Sincerely,

Arcadis U.S., Inc.

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Rebecca Andresen Vice President

Copies: Jason Michelson, Chevron/CEMC

#### Attachments

- 1 C-141 Closure Form
- 2 South Culebra Bluff Unit 3 Reports and Correspondences

arcadis.com SCB 3 Closure Report_V03 Received by OCD: 9/16/2024 2:25:25 PM Form C-141 State of New Mexico

Page 6

Oil Conservation Division

Incident ID	
District RP	2RP-3984
Facility ID	
Application ID	

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: Each of the following items must be included in the closure report. A scaled site and sampling diagram as described in 19.15.29.11 NMAC A Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection) Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling) Description of remediation activities I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete. Printed Name: Jason Michelson _____ Title: Project Manager Signature: <u>Aun Mill</u> Date: <u>8/19/2019</u> email: jmichelson@chevron.com Telephone: 832-854-5601 **OCD Only** Received by: Date: _____ Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations. Closure Approved by: _____ Date: _____ Printed Name: Title:



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON Governor Joanna Prukop Cabinet Secretary Mark E. Fesmire, P.E. Director Oil Conservation Division

17-Jan-06

## RANGE OPERATING NEW MEXICO INC

777 MAIN STREET SUITE 800 FT WORTH TX 76102

### **LETTER OF VIOLATION - Inspection**

2RP-3984

Dear Operator:

The following inspection(s) indicate that the well, equipment, location or operational status of the well(s) failed to meet standards of the New Mexico Oil Conservation Division as described in the detail section below. To comply with standards imposed by Rules and Regulations of the Division, corrective action must be taken immediately and the situation brought into compliance. The detail section indicates preliminary findings and/or probable nature of the violation. This determination is based on an inspection of your well or facility by an inspector employed by the Oil Conservation Division on the date(s) indicated.

Please notify the proper district office of the Division, in writing, of the date corrective actions are scheduled to be made so that arrangements can be made to reinspect the well and/or facility.

			INSPECTIC	N DETAIL	SECTION		
SOUTH CL Inspection Date	LEBRA BLU Type Inspectio		No.003 Inspector	Violation?	G-23-23S-28E *Significant Non-Compliance?	30-015-22700-00- Corrective Action Due By:	00 Inspection No.
01/11/2006	Routine/Peri Violations Surface Leaks/S		Chris Beadle	Yes	No	2/10/2006	iCLB0601142847
Comments	on Inspection:	examine va that the we fluids and s	Freg Swindle, White Buf rrious wells in this area f Il had standing fluids an saturated soils. on is required. Submit a 0, 2006.	or remediation d fresh soil co	n projects status. Driv ntamination on locatio	ving by this well, obse on. Cellar has standir	erved ng
		remediation	oved remediation must b n work plan is received, ation work or prior to ta	the NMOCD I	District 2 Office must	be notified 48 hours	prior to



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In the event that a satisfactory response is not received to this letter of direction by the "Corrective Action Due By:" date shown above, further enforcement will occur. Such enforcement may include this office applying to the Division for an order summoning you to a hearing before a Divison Examiner in Santa Fe to show cause why you should not be ordered to permanently plug and abandon this well. Such a hearing may result in imposition of CIVIL PENALTIES for your violation of OCD rules.

Sincerely,

Artesia OCD District Office

Note: Information in Detail Section comes directly from field inspector data entries - not all blanks will contain data. *Significant Non-Compliance events are reported directly to the EPA, Region VI, Dallas, Texas.

> Oil Conservation Division * 1301 W. Grand * Artesia, New Mexico 88210 Phone: 505-748-1283 * Fax: 505-748-9720 * http://www.emnid.state.nm.us

----

April 10, 2006

NMOCD District 2 Office Oil Conservation Division Chris Beadle 1301 West Grand Artesia, New Mexico 88210

RE: Letter of Violation for Range Operating New Mexico, Inc. Inspection, South Culebra Bluff (SCB) Unit No. 003

#### Chronology

On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range –Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained.

On March 29, 2006 after receiving notice from Tony Tucker, Range Resources Production Foreman Loving New Mexico Area., of completion of excavation and remediation; Ronnie Taylor of White Buffalo Environmental Services Inc arrived on site to perform final sampling. A sample was collected from the floor area of the spill site. The sample was immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The sample was analyzed for BTEX, TPH (NM 8015N), and Chloride content.

On April 10, 2006 the sample results were received from the laboratory. The results revealed that the BTEX, and TPH concentrations were above remediation limits. Further excavation will be performed and a future sampling date will be coordinated with you.

Please review the attached results and notify me via letter or email if you have any questions.

Sincerely,

Greg Swindle, President WBESI

Enclosures: Laboratory results Received by OCD: 9/16/2024 2:25:25 PM

## ASK Laboratories, Inc.

Analytical Services Kwik!

ASK LABORATORIES, INC. 5935 GLENOAK LANE AMARILLO, TEXAS 79109

Attn: CUSTOMER SERVICES Phone: (806) 353-4425

WHITE BUFFALO ENVIRO. SERVICE 5425 BEN FICKLIN ROAD SAN ANGELO, TX 76904 Order #: 06-03-131 Date: 04/06/06 09:46 Work ID: FLOOR COMPOSITE Date Received: 03/31/06 Date Completed: 04/06/06

Attn: GREG SWINDLE

Purchase Order: **PANGE SCB23** #3-B/ Invoice Number:

Client Code: WHITE BUFF

#### SAMPLE IDENTIFICATION

SampleSampleNumberDescription01FLOOR COMPOSITE

Sample Sample Number Description

Certified By ALAN D. KING

5935 Glenoak Lane Amarillo, Texas 79109 Telephone (806) 353-4425 Toll Free 1-800-423-9443 Facsimile (806) 352-6454

Please Note: Liability and Damages. ASK Laboratories, Inc. Ilability and clients exclusive remedy for any claim artising whether based in contract or tort, shall be limited to the amount paid by the client for the analysis. All claims, including those for negligence and any other cause whatscewer shall be deemed wakved unless made in writing and received by ASK Laboratories, Inc. within thirty days of the applicable service. In no event shall ASK Laboratories, inc. be liable for incidental or consequentiat damages, including those without limitation, business interruption, loss of uses of profits incurred by the client, its subsidiaries, artifiliates, or successors arising out of or related to the performance of services rendered by ASK Laboratories. Inc. regardless of whether such claim is based upon any of the preceding stated reasons or otherwise.

Received by OCD: 9/16/2024 2:25:25 PM

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## ASK Laboratories, Inc.

## Analytical Services Kwik!

Order # 06-03-131 04/06/06 09:46

#### ASK LABORATORIES, INC.

Page 2

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TEST RESULTS BY SAMPLE

Sample: 01A FLOOR COMPOSITE	Co	llected: 03/2	9/06 09:20		
<u>Test Description</u> PERCENT SOLIDS - DRY WT.	<u>Result</u> 94.45	SOL	<u>Units</u> wt % solids	<u>Analyzed</u> 03/31/06	<u>By</u> BJP
CHLORIDE ON SOLIDS	6260	100	mg/kg	03/31/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<78.7	78.7	mg/kg	04/05/06	BNH
TPH C12-C28 - DRO	5100	78.7	mg/kg	04/05/06	BNH
TPH C28-C35	982	78.7	mg/kg	04/05/06	BNH
BTEX		٨			
BENZENE	<0.017	0.017	mg/kg	04/03/06	KDJ
TOLUENE	<0.017	0.017	mg/kg	04/03/06	KDJ
ETHYLBENZENE	<0.017	0.017	mg/kg	04/03/06	KDJ
XYLENE	<0.017	0.017	mg/kg	04/03/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	109	Min: 80	Max:	120	

5935 Glenoak Lane Amarillo, Texas 79109 Telephone (806) 353-4425 Toll Free 1-800-423-9443 Facsimile (806) 352-6454

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## ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-03-131 04/06/06 09:46	ASK	LABORA	TORIES, INC	-		Page 3
			QA/QC INFO	RMATION		
	LCS	MS	MSD	RPD	BLANK	
MTBE	100%	107%	106%	0.4%	bdl	
BENZENE	99%	95%	93%	1.6%	bdl	
TOLUENE	96%	90%	91%	1.1%	bdl	
ETHYLBENZENE	99%	95%	96%	1.0%	bdl	
O-XYLENE	100%	93%	94%	0.8%	bdl	
m,p-XYLENES	100%	97%	97%	0.0%	bdl	
METHOD 8015	LCS	MS	MSD	RPD	BI	LANK
TPH	95%	94%	92%	2.3%	ł	bdl
COMPOUND	RPD	SPIKE	RECOVERY	QC RECOV	VERY E	BLANK
CHLORIDE	0.9%		918	94%		bdl

bdl = below detectable levels

#### TEST METHODOLOGIES

TEST CODE : SOLIDS	TEST NAME : PERCENT SOLIDS FOR DRY WT CORRECTIONS	
	REFERENCE CLP PROTOCOL/ SECTION IV/ PART F	
TEST CODE : 8015N	TEST NAME : TRPH-8015M (GRO, DRO, C28-35)	. :
	METHOD 8015M GCFID GAS CHROMATOGRAPHY WITH FLAME- IONIZATION DETECTOR. SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.	
TEST CODE : BTEX	TEST NAME : BTEX	
	METHOD 8260 GC/MS GAS CHROMATOGRAPHY WITH MASS- SELECTIVE DETECTOR. SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.	
TEST CODE : CL_SOL	TEST NAME : CHLORIDE ON SOLID	5935 Glenoak Lane Amarillo, Texas 79109 Telephone (806) 353-4425
	METHOD 300.0 : ION CHROMATOGRAPHY METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES,	Toll Free 1-800-423-9443
	METHOD 9056 ION CHROMATOGRAPHY SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.	

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Analytical Services Kwik!

5935 Glenoak Lane Amarillo, Texas 79109 Telephone: (806) 353-4425 Facsimile: (806) 352-6454

**Chain of Custody Record** 

Work Order No. Client Name White Buffald Environmental Project I.D./Location RANGE Operating SCB 23#3-B Address 5425 Ben Fuck Inn Rd San Angelo, X70 Telephone (325) 651-9054 Sampled By ROMMIE Taylor

Prease note: Liability and Damages. ASK Laboratories liability and cirents exclusive remedy for any claim arising withthe based in contract or tor, shall be limited to the amount paid by the client for the analyses. All claims, including those for negligence and other cause whatsoever shall be deemed walved unless made in writing and received by ASK Laboratories within thiny days of the applicable service. In no event shall ASK Laboratories be liable for incidential or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by the client, its subsidiaries, affiliates, or successors fraining out of or related to the precedinates, affiliates, or successors reprofits lacuratories by whether such claims is based upon any of the preceding stated reasons or otherwise.



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CHAIN OF CUSTODY	White Buffalo Environmental Services, Inc.	5425 Ben Ficklin Road San Angelo, Texas 76904	Phone: 325-651-9054 Fax: 325-651-2125	
U	White Bu	5		

Client (Name): Address:		Range	ge				<u>[</u>	Project (Nar	ле):	put	РC	ule	5 LA	Blt	Project (Name): SDUTH CULED rai Bluff 23 # 3-B	#3-B
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Fax:																
W.B.E.S. Lab No.	Date	Time	Comp. Grab.	Grab.	Sample Description		No. of Samples	Type of Container	BTEX .	NIM N	TCLP RCRA Metals	RCRA Metals	TDS	PAH (	PAH CHLORIDES	
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# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON Governor Joanna Prukop Cabinet Secretary Mark E. Fesmire, P.E. Director Oil Conservation Division

**Range Operating New Mexico, Inc.** 777 Main Street, Suite 800 Fort Worth, TX 76102 January 30, 2006

## **REMEDIATION WORK PLAN CONDITIONS OF APPROVAL - SOUTH CULEBRA BLUFF UNIT NO. 3**

Dear Operator:

A review of the remediation work plan submitted on January 27, 2006, by White Buffalo Environmental Services, Inc., for the South Culebra Bluff Unit #3 (30-015-22700) has been completed by this office. Conditions for approval are as follows:

- Highly Contaminated/Saturated Soils must be remediated by excavating to the maximum depth and horizontal extent practicable until a representative sample from the walls and bottom of the excavation is below the contaminant specific remediation level. Upon reaching this limit samples should be taken from the walls and bottom of the excavation to determine the remaining levels of soil contaminants. All soils removed from the location must be documented as to contaminants in the soils, contaminant levels, method of determining contaminant levels and disposition of the soils (OCD approved landfarm, centralized site, etc.).
  - Highly contaminated/saturated soils are defined as those soils which contain a free liquid phase or exhibit gross staining.
- Unsaturated Contaminated Soils may be excavated or may be remediated by treatment of soil in place, until a representative sample is below the contaminant specific remediation level. One time applications of contaminated soils may be landfarmed on location by spreading the soil in an approximately six inch lifts within a bermed area. Only soils which do not contain free liquids can be landfarmed. The soils should be disced regularly to enhance biodegradation of the contaminants. If necessary and upon approval by OCD, moisture and nutrients may be added to the soil to enhance aerobic biodegradation. Due to the site ranking score for this location, this is considered to be a high risk area and an impermeable liner is required to prevent leaching of contaminants into the underlying soil. Landfarming sites that will receive soils from more than one location are considered centralized sites and must be approved separately by the OCD prior to operation. All soils removed from the location must be documented as to contaminants in the soils, contaminant levels, method of determining contaminant levels and disposition of the soils (OCD approved landfarm, centralized site, etc.).
  - Unsaturated contaminated soils are defined as soils which are not highly contaminated/saturated but contain benzene, toluene, ethylbenzene and xylenes (BTEX) and total petroleum hydrocarbons (TPH) or other potential fresh water contaminants unique to the leak, spill or release (e.g. chlorides).
- Contaminated soils requiring remediation should be remediated so that residual contaminant concentrations are below the recommended soil remediation action level. Chloride levels should be remediated to naturally occurring background levels. If soil action levels cannot practicably be attained, a detailed evaluation of risk may be performed and provided in writing to OCD for approval showing that the remaining contaminants will not pose a threat to present or foreseeable beneficial use of fresh water, public health and the environment.

Oil Conservation Division * 1301 W Grand * Artesia, New Mexico 88210 Phone: (505) 748-1283 * Fax (505) 748-9720 * <u>http://www.emnrd.state.nm.us</u> • Once the "most cost effective means of disposal or onsite bioremediation" has been determined, as outlined in the remediation work plan, a supplement to the remediation work plan describing the method of disposal or bioremediation must be submitted to the OCD District 2 Office for approval.

م الديد من أو مُدْمَد من المراجع

- If ground water is encountered during the soil/waste characterization, excavation or remediation of the impacted soils, a sample should be obtained to assess the potential impact on ground water quality and the OCD District 2 Office should be notified immediately.
- Notify OCD District 2 Office 24 hours prior to conducting work by Range Operating New Mexico, Inc., contractors or sub-contractors that is intended to excavate, wash, move or disturb (such as in tilling, blading, etc.) soils or contaminated materials for the purpose of remediation, or hauling any soils or contaminated materials into or out of the location covered under this remediation work plan. This notification is to ensure NMOCD personnel are able to monitor compliance with approved remediation work plans as required by the New Mexico Administrative Code. Therefore, if a reasonable schedule of work cannot be provided then a separate notification that work is to resume is required if work ceases at the location for more than 5 days.
- Notify OCD District 2 Office 24 hours prior to obtaining samples where analysis of samples will be submitted to OCD. ALL final delineation sample results must be submitted to the OCD whether or not the OCD actually witnesses those samples being taken.
- Upon termination of any required remedial actions, the area of a leak, spill or release may be closed, after obtaining approval for the closure from the OCD District 2 office, by backfilling any excavated areas, contouring to provide drainage, revegetating the area or other OCD approved methods. Upon completion of remedial activities a final report summarizing all actions taken to mitigate environmental damage related to the leak, spill or release will be provided to OCD for approval.

Acceptance of the remediation work plan 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 reports and work plans does not relieve the operator of responsibility for compliance with any other federal, state or local laws and/or regulations.

NMOCD District 2 Contact Person: Chris Beadle, Office: (505) 748-1283 x107 / Cell: (505) 626-0831 / Fax: (505) 748-9720 / E-mail: Chris.Beadle@state.nm.us

Thank you for your prompt attention to this matter and your efforts in helping to protect our environment and the infrastructure of the oil and gas industry.

Sincerely,

Artesia OCD District Office

cc: Grcg Swindle, WBSEI (unsigned copy via e-mail)

January 27, 2006

NMOCD District 2 Office Oil Conservation Division Chris Beadle 1301 West Grand Artesia, New Mexico 88210

RE: Range Operating New Mexico, Inc. Inspection, South Culebra Bluff (SCB) Unit No. 003

#### Chronology

On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range –Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained. WBESI uses the attached information and metrics sheet for summarizing the remediation requirements for this site.

The following is an initial "Remediation Work Plan" for this site:

#### South Culebra Bluff (SCB) Unit No.003

General site characteristics Depth to Ground Water: 52' Wellhead Protection Area: 1000 yards to closest well Distance to Nearest Surface Water Body: 5,250' Site ranking score 10

Soil remediation action levels Highly Contaminated / Saturated Soils Benzene 10 ppm, BTEX 50 ppm, TPH 1000 ppm Soil remediation methods Excavation and disposal (or alternative approved onsite remediation) Planned analytical testing BTEX, TPH, Chlorides on soil

## Work Plan

- Excavate until limits are obtained in a vertical and horizontal direction.
- Sample site for above parameters.

- Determine quantity of spoils removed from the excavated area.
- Determine most cost effective means of disposal or onsite bioremediation in accordance with NMOCD "Guidelines for Remediation of Leaks, Spills, and Releases".
- Contact NMOCD to set up sampling and post remediation inspection for February 9, 2006.
- Review analytical results.
- Backfill excavation if limits have been achieved or continue excavation.
- Sampling will be per NMOCD guidance including all walls and floor of the excavation.
- A final report will be issued on behalf of Range to the NMOCD documenting all final activities.
- A final letter of concurrence and closure will be issued by NMOCD if all guidelines have been achieved.

For further questions or comments please contact White Buffalo Environmental Services, Inc. at (325) 651-9054.

Greg Swindle, President WBESI

Enclosures:

Information and Metrics sheet USGS Map Aerial Photo Site Photographs

## **RANGE OPERATING NEW MEXICO, INC**

Information and Metrics

		Information	and Metrics		
Incident Date: January 11.	, 2006		NMOCD Notifie	d: Januar	y 11, 2006
Site: South Culebra Bluff	Unit No.0	03	Assigned Site Re	ference #	: iCLB0601142847
Company: Range Operatir	ng New M	lexico, Inc.	····		
Street Address: 777 Main	Street Sui	ite 800			
Mailing Address: 777 Ma	in Street S	Suite 800			<u> </u>
City, State, Zip: Ft. Worth					* -
Representative: George T					
<b>Representative Telephone</b>		70-2601			
Fluid volume released (bb			<b>Recovered (bbls)</b>	:0	
		IOCD verbally within	24 hrs and submit forn		hin 15 days.
	(Also a	applies to unauthorized	d releases >500 mcf No	atural Gas)	
			orm C-141 within 15 d	ays	
Leak, Spill, or Pit (LSP) N					
Source of contamination:				ground	
Land Owner, i.e., BLM, S	, ,	ther: Johnny L. Ro	eid		
LSP Dimensions: 60' X 50					
LSP Area: All around well					
Location of Reference Poi	· · ·				
Location distance and dire	ection fro	om RP: NA			
Latitude: N 32° 17.588'					
Longitude: W 104° 3.282'					
Elevation above mean sea	level: 29	99' per USGS Map			
			,		
Location- Unit or 1/4 1/4: SE	E/4 NW/4	of Sec. 23	Unit Letter: M		
<b>Location Section:</b> 23					
<b>Location- Township: 23S</b>					
Location Range: 28E					
				_	
Surface water body within	n 1000' ra	adius of site: No 3	394' per USGS Ma	ıp	
Domestic water wells with	in 1000'	radius of site: No	1734' per map		
Agricultural water wells v	vithin 100	00' radius of site:	No 1734' per map		
Depth from land surface t				on relation	ship to Pecos River
Depth of contamination (I	DC): 8'				
Depth to ground water (D	<b>G</b> – <b>DC</b> =	= DtGW): 52'			
1. Ground water			rotection Area		ance to Surface Water Body
If Depth to GW <50 feet: 20 points		If <1000' from water		<200 horizontal feet: 20 points	
If Depth to GW 50 to 99 feet: 10 points		from private domestic water source: 20		200-100 horizontal feet: 10 points	
	points			200-100 r	iorizontal feet: 10 points
		points		200-100 r	
If Depth to GW >100 feet: 0 poir		points If >1000' from water	source, or >200'		
If Depth to GW >100 feet: 0 poir		points	source, or >200'		rizontal feet: 0 points
Ground Water Score = 10		points If >1000' from water from private domesti	source, or >200' c water source: 0	>1000 ho	
	nts	points If >1000' from water from private domesti points Wellhead Protection	source, or >200' c water source: 0 Area Score = 0	>1000 ho	rizontal feet: 0 points
Ground Water Score = 10 Site Rank (1+2+3) = 10	nts	points If >1000' from water from private domesti- points Wellhead Protection Site Ranking Score an	source, or >200' c water source: 0 Area Score = 0 d Acceptable Concent	>1000 ho	rizontal feet: 0 points /ater Score = 0
Ground Water Score = 10 Site Rank (1+2+3) = 10 Parameter	nts	points If >1000' from water from private domesti- points Wellhead Protection Site Ranking Score an >19	source, or >200' c water source: 0 Area Score = 0 d Acceptable Concent	>1000 ho	rizontal feet: 0 points /ater Score = 0 0-9
Ground Water Score = 10 Site Rank (1+2+3) = 10	nts	points If >1000' from water from private domesti- points Wellhead Protection Site Ranking Score an	source, or >200' c water source: 0 Area Score = 0 d Acceptable Concent	>1000 ho	rizontal feet: 0 points /ater Score = 0



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## Photographs 1/11/06 SCB 23-3



NW to SE view

## Photographs 1/11/06 SCB 23-3



East to West view

## Photographs 1/11/06 SCB 23-3



South to North view.

May 5, 2006

NMOCD District 2 Office Oil Conservation Division Mike Bratcher 1301 West Grand Artesia, New Mexico 88210

RE: Letter of Violation for Range Operating New Mexico, Inc. Inspection, South Culebra Bluff (SCB) Unit No. 003

## Chronology

On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range –Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained.

On March 29, 2006 after receiving notice from Tony Tucker, Range Resources Production Foreman Loving New Mexico Area., of completion of excavation and remediation; Ronnie Taylor of White Buffalo Environmental Services Inc arrived on site to perform final sampling. A sample was collected from the floor area of the spill site. The sample was immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The sample was analyzed for BTEX, TPH (NM 8015N), and Chloride content.

On April 10, 2006 the sample results were received from the laboratory. The results revealed that the BTEX, and TPH concentrations were above remediation limits. Further excavation will be performed and a future sampling date will be coordinated with you.

On April 13, 2006, Ronnie Taylor with WBESI performed additional sampling. The samples were immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The samples were analyzed for BTEX, TPH (NM 8015N), and Chloride content.

One April 19, 2006 the sample results were received from the laboratory. The results again revealed that the BTEX, and TPH concentrations were above remediation limits. Further excavation will be performed and a future sampling date will be coordinated with you.
Please review the attached results and notify me via letter or email if you have any questions.

Sincerely,

Greg Swindle, President WBESI

Enclosures:

Laboratory results Photographs

# ASK Laboratories, Inc.

Analytical Services Kwik!

ASK LABORATORIES, INC. 5935 GLENOAK LANE AMARILLO, TEXAS 79109

Attn: CUSTOMER SERVICES Phone: (806) 353-4425

WHITE BUFFALO ENVIRO. SERVICE 5425 BEN FICKLIN ROAD SAN ANGELO, TX 76904 Order #: 06-04-037 Date: 04/19/06 14:30 Work ID: SCB 23 #3B S1-S3 Date Received: 04/14/06 Date Completed: 04/19/06

Attn: GREG SWINDLE

Purchase Order: RANGE OPERATING, LOVING NM Invoice Number:

Client Code: WHITE BUFF

#### SAMPLE IDENTIFICATION

Sample			Sar	nple		Sa
<u>Number</u>		I	Desci	<u>ciption</u>		<u>N1</u>
01	SCB	23	#3B	S1		03
02	SCB	23	#3B	S2		

Sample			San	nple	
Number		I	Desci	<u>iptior</u>	1
03	SCB	23	#3B	S3	

Certified ALAN D. KING

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5935 Glenoak Lane Amarillo, Texas 79109 Telephone (806) 353-4425 Toll Free 1-800-423-9443 Facsimile (806) 352-6454

Please Note: Liability and Damages. ASK Laboratories, Inc. liability and clients exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analysis. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories, Inc. within thiny days of the applicable service. In no event shall ASK Laboratories, Inc. be liable for incidental or consequential damages, including those without limitation, business interruption, loss of use, or loss of profits incurred by the client, its subsidiaries, affiliates, or successors arising out of or related to the performance of services rendered by ASK Laboratories, Inc. regardless of whether such claim is based upon any of the preceding stated reasons or otherwise.

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# ASK Laboratories, Inc.

### Analytical Services Kwik!

Order # 06-04-037 04/19/06 14:30	ASK LABORATORIES,	INC.		Page 2	
	TEST RESULTS BY	<u> SAMPLE</u>			
Sample: 01A SCB 23 #3B S1	Colle	ected: 04/13	/06 09:15		
Test Description	Result	SQL	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	94.84		wt % solids	04/17/06	BJP
CHLORIDE ON SOLIDS	4390	100	mg/kg	04/18/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<33.5	33.5	mg/kg	04/18/06	BNH
TPH C12-C28 - DRO	2580	33.5	mg/kg	04/18/06	BNH
TPH C28-C35	629	33.5	mg/kg	04/18/06	BNH
BTEX					
BENZENE	<0.021	0.021	mg/kg	04/17/06	KDJ
TOLUENE	<0.021	0.021	mg/kg	04/17/06	KDJ
ETHYLBENZENE	<0.021	0.021		04/17/06	KDJ
XYLENE	0.046	0.021	mg/kg	04/17/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	99 N	1in: 80	Max:	120	

Sample: 02A SCB 23 #3B S2	Co	llected: 04/1	.3/06 09:15	
Test Description	Result	SQL	Units	Analyzed By
PERCENT SOLIDS - DRY WT.	97.99		wt % solids	04/17/06 BJP
CHLORIDE ON SOLIDS	7360	100	mg/kg	04/18/06 BNH
Total Pet. Hydrocarbons				
TPH C6-C12 - GRO	<32.7	32.7	mg/kg	04/18/06 BNH
TPH C12-C28 - DRO	999	32.7	mg/kg	04/18/06 BNH
ТРН С28-С35	240	32.7	mg/kg	04/18/06 BNH
BTEX				
BENZENE	<0.018	0.018	mg/kg	04/17/06 KDJ
TOLUENE	<0.018	0.018	mg/kg	04/17/06 ₅₉₃ 58 Bienoak Lane
ETHYLBENZENE	<0.018	0.018	mg/kg	04/17/AfnarillKPTexas 79109
XYLENE	<0.018	0.018	mg/kg	04 / 17616 (Affone 1(8806) 353-4425
Surrogates				Toll Free 1-800-423-9443
BROMOFLUOROBENZENE	102	Min: 80	Max:	120 Facsimile (806) 352-6454

Please Note: Liability and Damages, ASK Laboratories, Inc. Ilability and clients exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analysis. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories, Inc. within thirty days of the applicable service. In no event shall ASK Laboratories, Inc. be liable for incidental or consequential damages, including those without limitation, business interruption, loss of use, or loss of profits incurred by the client, its subsidiaries, affiliates, or successors arising out of or related to the performance of services rendered by ASK Laboratories, Inc. Vertices, Inc. event shall be the to the performance of services rendered by ASK Laboratories, Inc. Inc. Baberatories, Inc. event shall be the performance of services rendered by ASK Laboratories, Inc. Inc. Baberatories, Inc. Inc. Baberatories, Inc. We applicable services, Inc. Inc. Baberatories, Inc. Bab

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# ASK Laboratories, Inc.

### Analytical Services Kwik!

Order # 06-04-037 04/19/06 14:30	ASK LABORATORIE	S, INC.		Page 3	
	TEST RESULTS	BY SAMPLE			
Sample: 03A SCB 23 #3B S3	Co	llected: 04/1	3/06 09:15		
<u>Test Description</u> PERCENT SOLIDS - DRY WT.	<u>Result</u> 97.84	SOL	<u>Units</u> wt % solids	<u>Analyzed</u> 04/17/06	<u>By</u> BJP
CHLORIDE ON SOLIDS	10800	100	mg/kg	04/18/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<32.4	32.4	mg/kg	04/18/06	BNH
TPH C12-C28 - DRO	667	32.4	mg/kg	04/18/06	BNH
TPH C28-C35	146	32.4	mg/kg	04/18/06	BNH
BTEX					
BENZENE	<0.020	0.020	mg/kg	04/17/06	KDJ
TOLUENE	<0.020	0.020	mg/kg	04/17/06	KDJ
ETHYLBENZENE	<0.020	0.020	mg/kg	04/17/06	KDJ
XYLENE	<0.020	0.020	mg/kg	04/17/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	101	Min: 80	Max:	120	

QA/QC	INFORMATION
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	LCS	MS	MSD	RPD	BLANK	5		
MTBE	91%	93%	103%	10.7%	bdl			
BENZENE	97%	938	93%	0.3%	bdl			
TOLUENE	89%	86%	85%	1.5%	bdl			
ETHYLBENZENE	92%	89%	89%	0.9%	bdl			
O-XYLENE	93%	88%	88%	0.8%	bdl			
m,p-XYLENES	89%	91%	90%	1.2%	bdl		,	
METHOD 8015	LCS	MS	MSD	RPD		BLANK		
TPH	98%	79%	76%	1.8%		bdl		
							5935 Glenoak Lane	1
COMPOUND	RPD	SPIKE F	RECOVERY	QC RECO	VERY	BLANK	Amarillo, Texas 79109	)
CHLORIDE	0.3%	9	918	95%		bdl	Telephone (806) 353-4425	)
							Toll Free 1-800-423-9443	ł
below detectable	e levels						Facsimile (806) 352-6454	ŀ

bdl = below detectable levels

Please Note: Liability and Damages. ASK Laboratories, Inc. liability and clients exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analysis. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories, Inc. within thirty days of the applicable service. In no event shall ASK Laboratories, inc. be liable for inckiental or consequential damages, including those without limitation, business interruption, loss of use, or loss of profits incurred by the client, its subsidiaries, affiliates, or successors arising out of or related to the performance of services rendered by ASK Laboratories, Inc. regardless of whether such claim is based upon any of the preceding stated reasons or otherwise.

Analytical Services Kwik!

Order # 06-04-037 04/19/06 14:30	ASK LABORATORIES, INC.	Page 4
	TEST METHODOLOGIES	
TEST CODE : SOLIDS	TEST NAME : PERCENT SOLIDS FOR DRY WT (	CORRECTIONS
	REFERENCE CLP PROTOCOL/ SECTION IV/ PAP	RT F
TEST CODE : 8015N	TEST NAME : TRPH-8015M (GRO, DRO, C28-35	5)
	METHOD 8015M GCFID GAS CHROMATOGRAPHY IONIZATION DETECTOR. SW-846 TEST METHO EVALUATING SOLID WASTES.	
TEST CODE : BTEX	TEST NAME : BTEX	
	METHOD 8260 GC/MS GAS CHROMATOGRAPHY W SELECTIVE DETECTOR. SW-846 TEST METHOD EVALUATING SOLID WASTES.	
TEST CODE : CL_SOL	TEST NAME : CHLORIDE ON SOLID	
	METHOD 300.0 : ION CHROMATOGRAPHY METHODS FOR CHEMICAL ANALYSIS OF WATER	AND WASTES,
	METHOD 9056 ION CHROMATOGRAPHY	

SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.

5935 Glenoak Lane Amarillo, Texas 79109 Telephone (806) 353-4425 Toll Free 1-800-423-9443 Facsimile (806) 352-6454

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Analytical Services Kwik!

5935 Glenoak Lane Amarillo, Texas 79109 Telephone: (806) 353-4425 Facsimile: (806) 352-6454

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**Chain of Custody Record** 

Work Order No. Client Name White BUSSala Firiranmental Project I.D. Accetion Rawae Duer Meine NM Address S435 Ben Firklin Nd Saw Angelon W Telephone 335) 651-9054 Sampled By Rommie Torylor

900

Please note: Liability and Damages. ASK Laboratories liability and clients exclusive remedy for any daim arising whither based in contract or tort, shall be limited to the amount paid by the client for the analyses. All clients, introding throse for negligence and other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories within thinty days of the applicable service. In no event shall ASK Laboratories within this days of the applicable service. In no event shall additing without fimilation, business intarruptions, loss of use, or loss of profits incurred by the client, its subsidiaries, affiliates, or successors arising out of or related to the performance of services or successors arising to do related to the performance of services rendered by ASK Laboratories regardless of whether such datins is based upon any of the proceding stated reasons or dherwise.

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n62 IGU	niT	вM		Gra		Description		N Cor	$\sum$		$\langle \rangle$	$\backslash$	$\backslash$	Kemarks	
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Relipquished by: [Signature	and the second	Date	Date 2-13-04		330 0	Received by: [signature]	Remarks:	ζeγ ,	2				.		
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Relinquished by: (Signature)	ure)	Date		am 11 11 11 11 11 11 11 11 11 11 11 11 11		Received by: (signature)	Property Sealed	>			ŹŻ Łł	lf No, Explain If No Temo		LIKT POL.	
Client Agrees to:							Tamper Seal	2			5	Comments		i i	
Accept Returned Sample	i Sample				:										
Pay for sample Disposal (\$30 per 100 grams)	Jisposal (\$30 f	cer 100 grams)					Type of Container							ľ	
Client's Signature _	e						Additional Comments:	:21							

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### **ASK LABORATORIES, INC**

# Login Checklist

Order # 0604037

Shipping Method: ______ BUS____ Date/Time of Receipt: _____ 474 0705____

**Cooler Check** 

		Ice i	n Cooler	(	Custo	dy Sea	ป	
Shipping Container			If No,	Pres	ent?	Int	act?	Tracking Number
~~ -	Yes	No	Temperature	Yes	No	Yes	No	
Core	X				X			

Note: If the temperature of a cooler/sample is above 6°C fill out NCR.

<b>Custody Seals</b>	on Bottles Present:	Yes	No_ <u>×</u>
	If Yes, is it intact? If Not intact, fill out NCR	Yes	No
Condition of C			
	Loose Caps:	Yes	No
	If Yes, fill out NCR		
	Broken Containers: If Yes, fill out NCR	Yes	K No
	ody Included: eccipt of all containers listed a and fill out laboratory boxes.		fields are complete. Sign
	<b>d Samples: pH<!--=2</b--> If No, fill out NCR</b>	Yes	NoNA
	<b>d Samples: pH&gt;/=12</b> If No, fill out NCR	Yes	No
Coolers Unpac	cked/Checked by:		Date: 4 79
NCRs (y/n):	$\underline{\mathcal{N}}$	Faxed Conf	irmation (y/n):

5935 Glenoak Lane Amarillo, TX 79109

### Site Photographs SCB 23-3 4-13-2006



### Bratcher, Mike, EMNRD

From:	Greg Swindle [greg@wbesi.com]
Sent:	Friday, May 05, 2006 1:09 PM
То:	'Tony Tucker'; Bratcher, Mike, EMNRD
Cc:	'Linda Stiles'
Subject:	SCB 23-3 or SCB 3B
Attachments	: SCB 23-3 5-5-06.pdf

Tony and Mike,

Attached is a letter and sample analysis showing that the referenced site is still above remediation limits.

Tony, please continue excavation for one more time. Another 12-18 inches maybe will clear this site. If we do not achieve limits at that time way may need to research another form of closure.

Mike, please review that attached results. We will be contacting you at least 48 hours prior to the next sampling event. If you have any questions please don't hesitate to call.

If any of you need a hard copy of this let me know. A hard copy of all results, photographs, and complete documentation will be furnished to all in a bound final report upon obtaining closure limits.

### Greg Swindle

President White Buffalo Environmental Services, Inc. 5425 Ben Ficklin Road San Angelo, Texas 76904 Phone (325) 651-9054 Fax (325) 651-2125 Cell (325) 895-0410

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From: Deepa Floyd [mailto:deepa@wbesi.com] Sent: Friday, May 05, 2006 1:52 PM To: Greg Swindle Subject: SCB 23-3

Deepa Floyd White Buffalo Environmental Services, Inc. 5425 Ben Ficklin Road San Angelo, TX 76904 Phone: (325) 651-9054 Fax: (325) 651-2125 deepa@wbesi.com SITE INVESTIGATION • PROPERTY EVALUATION • CONSULTING SERVICE • REMEDIATION • MONITORING • SOLID WASTE MANAGEMENT • EMERGENCY RESPONSE

## WHITE BUFFALO ENVIRONMENTAL SERVICES

July 10, 2006

NMOCD District 2 Office Oil Conservation Division Mike Bratcher 1301 West Grand Artesia, New Mexico 88210 RECEIVED JUL 1 2 2006

Page 118 of 171

RE: Letter of Violation for Range Operating New Mexico, Inc. Inspection, South Culebra Bluff (SCB) Unit No. 003

### Chronology

On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range –Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained. See attachment #1

On March 29, 2006 after receiving notice from Tony Tucker, Range Resources Production Foreman Loving New Mexico Area., of completion of excavation and remediation; Ronnie Taylor of White Buffalo Environmental Services Inc arrived on site to perform final sampling. A sample was collected from the floor area of the spill site. The sample was immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The sample was analyzed for BTEX, TPH (NM 8015N), and Chloride content.

On April 10, 2006 the sample results were received from the laboratory. The results revealed that the BTEX, and TPH concentrations were above remediation limits. See attachment #2 for the results of this sampling.

On April 13, 2006 the site was again visited after further excavation. The results of this sampling was obtained and revealed again that limits were exceeded and further sampling would be required. See attachment #3 for the results of this sampling.

On May 17, 2006 the site was again visited after further sampling. The analytical results revealed that the limits were obtained and no further excavation was required. See attachment # 4 for these results.

Tony Tucker of Range was notified that the limits had been obtained and that site closure was now warranted. Tony utilized the services of several trucking firms in the Loving area to transport the spoils of the excavation to Controlled Recovery, Inc.; PO Box 388;

5425 BEN FICKLIN ROAD, SAN ANGELO, TEXAS 76904 • (325) 651-9054 • FAX (325) 651-2125 Working For A Better Environment Hobbs, New Mexico, 88241-0388 (CRI). CRI was the final disposal place of all of the contaminated soils numbering approximately 212 cubic yards based upon the Manifest enclosed in Attachment #5 of this letter.

Please consider this NOV action item complete and send Range Operating Company your concurrence of final closure on this NOV action item.

Please review the attached results and notify me via letter or email if you have any questions.

Sincerely,

Greg Swindle, President WBESI

Enclosures:

Attachment #1 Filed Remediation Work plan Attachment #2 03/29/06 Sampling Results and Documentation Attachment #3 04/13/06 Sampling Results and Documentation Attachment #4 05/17/06 Sampling Results and Documentation Attachment #5 Disposal Manifest.

#### January 27, 2006

NMOCD District 2 Office Oil Conservation Division Chris Beadle 1301 West Grand Artesia, New Mexico 88210

RE: Range Operating New Mexico, Inc. Inspection, South Culebra Bluff (SCB) Unit No. 003

#### Chronology

On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range –Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained. WBESI uses the attached information and metrics sheet for summarizing the remediation requirements for this site.

The following is an initial "Remediation Work Plan" for this site:

### South Culebra Bluff (SCB) Unit No.003

General site characteristics

Depth to Ground Water: 52'

Wellhead Protection Area: 1000 yards to closest well Distance to Nearest Surface Water Body: 5,250' Site ranking score 10

#### Soil remediation action levels

Highly Contaminated / Saturated Soils

Benzene 10 ppm, BTEX 50 ppm, TPH 1000 ppm

### Soil remediation methods

Excavation and disposal (or alternative approved onsite remediation)

### Planned analytical testing

BTEX, TPH, Chlorides on soil

### Work Plan

- Excavate until limits are obtained in a vertical and horizontal direction.
- Sample site for above parameters.

- Determine quantity of spoils removed from the excavated area.
- Determine most cost effective means of disposal or onsite bioremediation in accordance with NMOCD "Guidelines for Remediation of Leaks, Spills, and Releases".
- Contact NMOCD to set up sampling and post remediation inspection for February 9, 2006.
- Review analytical results.
- Backfill excavation if limits have been achieved or continue excavation.
- Sampling will be per NMOCD guidance including all walls and floor of the excavation.
- A final report will be issued on behalf of Range to the NMOCD documenting all final activities.
- A final letter of concurrence and closure will be issued by NMOCD if all guidelines have been achieved.

For further questions or comments please contact White Buffalo Environmental Services, Inc. at (325) 651-9054.

Greg Swindle, President WBESI

Enclosures:

Information and Metrics sheet USGS Map Aerial Photo Site Photographs

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# RANGE OPERATING NEW MEXICO, INC

		Information	and Metrics		
Incident Date: January 11.	, 2006		NMOCD Notifie		
Site: South Culebra Bluff U	Unit No.0	03	Assigned Site Re	e <b>ference</b> #: i	CLB0601142847
Company: Range Operatir		-			
Street Address: 777 Main				·	
Mailing Address: 777 Ma	in Street S	Suite 800			
City, State, Zip: Ft. Worth	n, TX 761	02	۰.		
Representative: George T	eer				
<b>Representative Telephone</b>	: (817) 8	70-2601			
Fluid volume released (bb			Recovered (bbls)		
25 bbls:			24 hrs and submit for		n 15 days.
<u></u>	(Also (		d releases >500 mcf N		
Leel Smill on Did (LSD) N	lomos SC		form C-141 within 15 a	tays	
Leak, Spill, or Pit (LSP) N			J J		
Source of contamination:				i grouna	~ <del>.</del> ~~~
Land Owner, i.e., BLM, S LSP Dimensions: 60' X 50		ther: Johnny L. R		,,	
LSP Area: All around well					
Location of Reference Poi	<u> </u>				······································
Location distance and dire	ection fro	<b>M RP:</b> NA			
Latitude: N 32° 17.588'					
Longitude: W 104° 3.282'					
Elevation above mean sea	level: 29	99' per USGS Map	)		
Location- Unit or ¼ ¼: SE	2/4 NW/4	of Sec. 23	Unit Letter: M		
Location Section: 23					
Location- Township: 23S					
Location Range: 28E			·		
Surface water body within	n 1000' ra	dius of site: No. 3	394' per USGS M	an	
Domestic water wells with				чр	
Agricultural water wells w					
Depth from land surface t					nin to Pecos River
Depth of contamination (I			committee based up		
Depth to ground water (D		= DtGW): 52'			· // ··· ·
1. Ground water			Protection Area	3. Distan	ce to Surface Water Body
If Depth to GW <50 feet: 20 point	its	If <1000' from water			ntal feet: 20 points
If Depth to GW 50 to 99 feet: 10		from private domesti points			izontal feet: 10 points
If Depth to GW >100 feet: 0 point	its	If >1000' from water from private domesti points		>1000 horiz	ontal feet: 0 points
Ground Water Score = 10		Wellhead Protection	Area Score = 0	Surface Wat	er Score = 0
Site Rank $(1+2+3) = 10$					
	Total S		d Acceptable Concen	trations	0.0
<b>n</b> .		>19	10-19	0-9 10 ppm	
Parameter		10 nnm	10 000	1	10 nnm
Parameter Benzene BTEX		10 ppm 50 ppm	10 ppm 50 ppm		10 ppm 50 ppm





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### Photographs 1/11/06 SCB 23-3



# NW to SE view

### Photographs 1/11/06 SCB 23-3



East to West view

### Photographs 1/11/06 SCB 23-3



South to North view.

April 10, 2006

NMOCD District 2 Office Oil Conservation Division Chris Beadle 1301 West Grand Artesia, New Mexico 88210

RE: Letter of Violation for Range Operating New Mexico, Inc. Inspection, South Culebra Bluff (SCB) Unit No. 003

#### Chronology

On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range –Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained.

On March 29, 2006 after receiving notice from Tony Tucker, Range Resources Production Foreman Loving New Mexico Area., of completion of excavation and remediation; Ronnie Taylor of White Buffalo Environmental Services Inc arrived on site to perform final sampling. A sample was collected from the floor area of the spill site. The sample was immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The sample was analyzed for BTEX, TPH (NM 8015N), and Chloride content.

On April 10, 2006 the sample results were received from the laboratory. The results revealed that the BTEX, and TPH concentrations were above remediation limits. Further excavation will be performed and a future sampling date will be coordinated with you.

Please review the attached results and notify me via letter or email if you have any questions.

Sincerely,

Greg Swindle, President WBESI

Enclosures: Laboratory results

Page 129 of 171

# ASK Laboratories, Inc.

Analytical Services Kwik!

ASK LABORATORIES, INC. 5935 GLENOAK LANE AMARILLO, TEXAS 79109

Attn: CUSTOMER SERVICES Phone: (806) 353-4425

WHITE BUFFALO ENVIRO. SERVICE 5425 BEN FICKLIN ROAD SAN ANGELO, TX 76904 Order #: 06-03-131 Date: 04/06/06 09:46 Work ID: FLOOR COMPOSITE Date Received: 03/31/06 Date Completed: 04/06/06

Attn: GREG SWINDLE

Received by OCD: 9/16/2024 2:25:25 PM

Purchase Order: RANGE SCB23 #3-B/ Invoice Number:

Client Code: WHITE BUFF

#### SAMPLE IDENTIFICATION

SampleSampleNumberDescription01FLOORCOMPOSITE

Sample Sample <u>Number</u> <u>Description</u>

Certified By ALAN D. KING

> 5935 Glencak Lane Amarillo, Texas 79109 Telephone (806) 353-4425 Toll Free 1-800-423-9443 Facsimile (806) 352-6454

Please Note: Liability and Damages. ASK Laboratories, Inc. liability and clients exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analysis. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories, inc. within thirty days of the applicable service. In no event shall ASK Laboratories, inc. be liable for incidental or consequential damages, including timitation, business interruption, loss of use, or loss of profile incurred by the client, its subsidiaries, affiliates, or successors arising out of or related to the performance of services rendered by ASK Laboratories, inc. "Released to Imaging: 9/16/2024 2:26:49 PM

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# ASK Laboratories, Inc.

### Analytical Services Kwik!

Order # 06-03-131 04/06/06 09:46 ASK LABORATORIES, INC.

Page 2

TEST RESULTS BY SAMPLE

Sample: 01A FLOOR COMPOSITE	Sample: 01A FLOOR COMPOSITE Collected: 03/29/06 09:20												
<u>Test Description</u> PERCENT SOLIDS - DRY WT.	<u>Result</u> 94.45	SQL	<u>Units</u> wt % solids	<u>Analyzed</u> 03/31/06	<u>By</u> BJP								
CHLORIDE ON SOLIDS	6260	100	mg/kg	03/31/06	BNH								
Total Pet. Hydrocarbons													
TPH C6-C12 - GRO	<78.7	78.7	mg/kg	04/05/06	BNH								
TPH C12-C28 - DRO	5100	78.7	mg/kg	04/05/06	BNH								
TPH C28-C35	982	78.7	mg/kg	04/05/06	BNH								
BTEX	•												
BENZENE	<0.017	0.017	mg/kg	04/03/06	KDJ								
TOLUENE	<0.017	0.017	mg/kg	04/03/06	KDJ								
ETHYLBENZENE	<0.017	0.017	mg/kg	04/03/06	KDJ								
XYLENE	<0.017	0.017	mg/kg	04/03/06	KDJ								
Surrogates													
BROMOFLUOROBENZENE	109	Min: 80	Max:	120									

5935 Glenoak Lane Amarillo, Texas 79109 Telephone (806) 353-4425 Toll Free 1-800-423-9443 Facsimile (806) 352-6454

Please Note: Liability and Damages. ASK Laboratories, Inc. liability and clients exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analysis. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories, Inc. within thirty days of the applicable service. In no event shall ASK Laboratories, inc. be liable for incidental or consequential damages, including those without limitation, business interruption, loss of use, or loss of profits incurred by the client, its subsidiaries, affiliates, or successors arising out of or related to the performance of services rendered by ASK Laboratories. *Plant Client in the proceeding stated reasons or otherwise.* Released to Imaging: 9/16/2024 2:26:49 PM

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# ASK Laboratories, Inc.

### **Analytical Services Kwik!**

Order # 06-03-131 04/06/06 09:46	ASK	LABORA	TORIES, INC	•	I	eage?	3
			QA/QC INFO	RMATION			
	LCS	MS	MSD	RPD	BLANK		
MTBE	100%	107%	106%	0.4%	bdl		
BENZENE	998	95%	938	1.6%	bdl		
TOLUENE	96%	90%	91%	1.18	bdl		
ETHYLBENZENE	99%	95%	96%	1.0%	bdl		
O-XYLENE	100%	93%	94%	0.8%	bdl		
m,p-XYLENES	100%	97%	978	0.0%	bdl		
METHOD 8015	LCS	MS	MSD	RPD	BLANK		
TPH	95%	94%	92%	2.3%	bdl		
COMPOUND CHLORIDE	RPD 0.9%	SPIKE	RECOVERY 91%	QC RECO 94%	VERY BLANK bdl		
CALLOR IDE	0.20		J = 4	740	DGT		

bdl = below detectable levels

#### TEST METHODOLOGIES

TEST CODE : SOLIDS	TEST NAME : PERCENT SOLIDS FOR DRY WT CORRECTIONS	
	REFERENCE CLP PROTOCOL/ SECTION IV/ PART F	
TEST CODE : 8015N	TEST NAME : TRPH-8015M (GRO, DRO, C28-35)	
	METHOD 8015M GCFID GAS CHROMATOGRAPHY WITH FLAME- IONIZATION DETECTOR. SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.	
TEST CODE : BTEX	TEST NAME : BTEX	
	METHOD 8260 GC/MS GAS CHROMATOGRAPHY WITH MASS- SELECTIVE DETECTOR. SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.	
TEST CODE : CL_SOL	TEST NAME : CHLORIDE ON SOLID	5935 Glenoak Lane Amarillo, Texas\79109 Telephone (806) 353-4425
	METHOD 300.0 : ION CHROMATOGRAPHY METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES,	Toll Free 1-800-423-9443 Facsimile (806) 352-6454
	METHOD 9056 ION CHROMATOGRAPHY SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.	

Please Note: Liability and Damages. ASK Laboratories, inc. liability and clients exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analysis. All claims, including those for negligence and any other cause whatacever shall be deemed waived unless made in writing and received by ASK Laboratories, inc. within thirty days of the applicable service. In no event shall ASK Laboratories, inc. be liable for incldental or consequential damages, including those without limitation, business Interruption, bas of use, or loss of profile incurred by the client, its subsidiaries, affiliates, or successors arising out of or related to the performance of services rendered by ASK Laboratories. Inc. regardless of whether such claim is based upon any of the precading stated reasons or otherwise. *Released to Imaging: 9/16/2024 2:26:49 PM* 

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ASK Laboratories Analytical Services Kwiki 5035 Gienoak Lane Amarilo, Texas 79109 Telephone: (806) 352-6454 Facsimile: (806) 700 Facsimile:		of Custo E Buffalo Range Oper en Fucktin R 651-9054 onnie Tay		0	-			• \$		•			Received by 1900 and 1	Received by signatures		· · · ·
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CHAIN O White Buffalo Envir 5425 Ben Ficklin Roe Phone: 325-651-	CHAIN OF CUSTODY White Buffalo Environmental Services, Inc. 5425 Ben Ficklin Road San Angelo, Texas 76904 Phone: 325-651-9054 Fax: 325-651-2125
Client (Name): Range Address:	Project (Name): SDUTH CULLED ra Bluff 23 # 3-B
City, State, Zip:	Location: LOVING, NM
Telephone:	
Fax: W.B.E.S. Date Time Comp. Grab. Sample Description	Type of BTEX TRPH TCLP
329 9:20 X Floor composit	e 1 alas X X Metais X
06-	
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### Range New Mexico 3-29-06 Spill Cleanup Loving, Eddy County, New Mexico



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May 5, 2006

NMOCD District 2 Office Oil Conservation Division Mike Bratcher 1301 West Grand Artesia, New Mexico 88210

RE: Letter of Violation for Range Operating New Mexico, Inc. Inspection, South Culebra Bluff (SCB) Unit No. 003

#### Chronology

On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range –Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained.

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On April 10, 2006 the sample results were received from the laboratory. The results revealed that the BTEX, and TPH concentrations were above remediation limits. Further excavation will be performed and a future sampling date will be coordinated with you.

On April 13, 2006, Ronnie Taylor with WBESI performed additional sampling. The samples were immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The samples were analyzed for BTEX, TPH (NM 8015N), and Chloride content.

One April 19, 2006 the sample results were received from the laboratory. The results again revealed that the BTEX, and TPH concentrations were above remediation limits. Further excavation will be performed and a future sampling date will be coordinated with you.

Please review the attached results and notify me via letter or email if you have any questions.

Sincerely,

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Greg Swindle, President WBESI

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Enclosures: Laboratory results Photographs

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# ASK Laboratories, Inc.

**Analytical Services Kwik!** 

#### ASK LABORATORIES, INC. 5935 GLENOAK LANE AMARILLO, TEXAS 79109

Attn: CUSTOMER SERVICES Phone: (806) 353-4425

WHITE BUFFALO ENVIRO. SERVICE 5425 BEN FICKLIN ROAD SAN ANGELO, TX 76904 Order #: 06-04-037 Date: 04/19/06 14:30 Work ID: SCB 23 #3B S1-S3 Date Received: 04/14/06 Date Completed: 04/19/06

Attn: GREG SWINDLE

Purchase Order: RANGE OPERATING, LOVING NM Invoice Number:

Client Code: WHITE_BUFF

#### SAMPLE IDENTIFICATION

 Sample
 Sample

 Number
 Description

 01
 SCB 23 #3B S1

 02
 SCB 23 #3B S2

SampleSampleNumberDescription03SCB 23 #3B S3

Certified H ALAN D. KING

5935 Glenoak Lane Amarilio, Texas 79109 Telephone (806) 353-4425 Toll Free 1-800-423-9443 Facsimile (806) 352-6454

Please Note: Liability and Damages. ASK Laboratories, Inc. Ilability and clients exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analysis. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories, inc. within thirty days of the applicable service. In no event shall ASK Laboratories, inc. be liable for incidental or consequential damages, including those without limitation, business interruption, loss of use, or toss of profils incurred by the client, its subsidiaries, affiliates, or successors arising out of or related to the performance of sector by ASK Laboratories, inc. be liable to the performance of the sector by ASK Laboratories, including those without limitation, business interruption, loss of use, or toss of profils incurred by the client, its subsidiaries, affiliates, or successors arising out of or related to the performance of sector by ASK Laboratories, including the sector by ASK Laboratories, including the client by ASK Laboratories, including the client is a sector by ASK Laboratories, including the sector by ASK Laboratories, affiliates, or successors arising out of or related to the performance of sectors and the preceding stated reasons or otherwise.

### **Analytical Services Kwik!**

Page 2

Order # 06-04-037 04/19/06 14:30

SCB 23 #3B S1

Sample: 01A

ASK LABORATORIES, INC.

#### TEST RESULTS BY SAMPLE

Collected: 04/13/06 09:15

<u>Test Description</u> PERCENT SOLIDS - DRY WT.	<u>Result</u> 94.84	SOL	<u>Units</u> wt % solids	<u>Analyzed</u> 04/17/06	<u>By</u> BJP
CHLORIDE ON SOLIDS	4390	100	mg/kg	04/18/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<33.5	33.5	mg/kg	04/18/06	BNH
TPH C12-C28 - DRO	2580	33.5	mg/kg	04/18/06	BNH
ТРН С28-С35	629	33.5	mg/kg	04/18/06	BNH
BTEX					
BENZENE	<0.021	0.021	mg/kg	04/17/06	КŊJ
TOLUENE	<0.021	0.021	mg/kg	04/17/06	KDJ
ETHYLBENZENE	<0.021	0.021	mg/kg	04/17/06	KDJ
XYLENE	0.046	0.021	mg/kg	04/17/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	· 99	Min: 80	Max:	120	

Sample: 02A SCB 23 #3B S2 Collected: 04/13/06 09:15

Test Description PERCENT SOLIDS - DRY WT.	<u>Result</u> 97.99	SQL	<u>Units</u> wt % solids	Analyzed By 04/17/06 BJP
CHLORIDE ON SOLIDS	7360	100	mg/kg	04/18/06 BNH
Total Pet. Hydrocarbons				
TPH C6-C12 - GRO	<32.7	32.7	mg/kg	04/18/06 BNH
TPH C12-C28 - DRO	. 999	32.7	mg/kg	04/18/06 BNH
TPH C28-C35	240	32.7	mg/kg	04/18/06 BNH
BTEX		1	•	, ,
BENZENE	<0.018	0.018	mg/kg	04/17/06 KDJ
TOLUENE	<0.018	0.018	mg/kg	04/17/06 ₅₉₃ 5812 noak Lane
ETHYLBENZENE	<0.018	0.018	mg/kg	04/17/Amarilik DF Jass 79109
XYLENE	<0.018	0.018	mg/kg	04/1761601f60ne 1(8006) 353-4425
Surrogates				Toll Free 1-800-423-9443
BROMOFLUOROBENZENE	102	Min: 80	Max:	120 Facsimile (806) 352-6454

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### **Analytical Services Kwik!**

Order # 06-04-037 04/19/06 14:30	ASK LABORATORIE	S, INC.		Page 3	
	TEST RESULTS	BY SAMPLE			
Sample: 03A SCB 23 #3B S3	Co	llected: 04/1	3/06 09:15		
Test Description	Result	SQL	Units	Analyzed	<u>By</u>
PERCENT SOLIDS - DRY WT.	97.84		wt % solids	04/17/06	BJP
CHLORIDE ON SOLIDS .	10800	100	mg/kg	04/18/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<32.4	32.4	mg/kg	04/18/06	BNH
TPH C12-C28 - DRO	667	32.4	mg/kg	04/18/06	BNH
ТРН С28-С35	146	32.4	mg/kg	04/18/06	BNH
BTEX					
BENZENE	<0.020	0.020	mg/kg	04/17/06	KDJ
TOLUENE	<0.020	0.020	mg/kg	04/17/06	KDJ
ETHYLBENZENE	<0.020	0.020	mg/kg	04/17/06	KDJ
XYLENE	<0.020	0.020	mg/kg	04/17/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	101	Min: 80	Max:	120	

#### QA/QC INFORMATION

	LCS	MS	MSD	RPD	BLANE	ζ	. • •
MTBE	91%	93%	103%	10.7%	bdl		
BENZENE	97%	93%	938	0.3%	bdl		
TOLUENE	89%	86%	85%	1.5%	bdl		
ETHYLBENZENE	92%	89%	89%	0.9%	bdl		· .
o-XYLENE	93%	888	88%	0.8%	bdl		
m,p-XYLENES	89%	91%	90%	1.2%	bdl		
METHOD 8015	LCS	MS	MSD	RPD		BLANK	
TPH	988	79%	76%	1.8%	ï	bdl	
				4			5935 Glenoak Lane
COMPOUND	RPD	SPIKE	RECOVERY	QC RECC	VERY	BLANK	Amarilio, Texas 79109
CHLORIDE	0.3%		91%	95%		bdl	Telephone (806) 353-4425
				;			Toll Free 1-800-423-9443
							T

bdl = below detectable levels

Facsimile (806) 352-6454

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### Analytical Services Kwik!

Order # 06-04-037 ASK LABORATORIES, INC. Page 4 04/19/06 14:30 TEST METHODOLOGIES TEST NAME : PERCENT SOLIDS FOR DRY WT CORRECTIONS TEST CODE : SOLIDS REFERENCE CLP PROTOCOL/ SECTION IV/ PART F TEST CODE : 8015N TEST NAME : TRPH-8015M (GRO, DRO, C28-35) METHOD 8015M GCFID GAS CHROMATOGRAPHY WITH FLAME-IONIZATION DETECTOR. SW-846 TEST METHODS FOR EVALUATING SOLID WASTES. TEST CODE : BTEX TEST NAME : BTEX METHOD 8260 GC/MS GAS CHROMATOGRAPHY WITH MASS-SW-846 TEST METHODS FOR SELECTIVE DETECTOR. EVALUATING SOLID WASTES. TEST CODE : CL SOL TEST NAME : CHLORIDE ON SOLID

> METHOD 300.0 : ION CHROMATOGRAPHY METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES,

METHOD 9056 ION CHROMATOGRAPHY SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.

> 5935 Glenoak Lane Amarillo, Texas 79109 Telephone (806) 353-4425 Toll Free 1-800-423-9443 Facsimile (806) 352-6454

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ea by OCD: 9/10/2024 2:2	·		1			·		<del></del>	r	<del>1</del>	1	1	<u> </u>				ge 141
Please note: Labulity and Damages. ASK Laboratories liability and clients exclusive remedy for any dalim arising whither based in contract or tor, shall be limited to the amount pagenes and other cause whatscever shall be deemed waived unless made in writing and received by ASK Laboratories within third days of the applicable service. In no event shall ASK Laboratories within third days of the applicable service. In no event shall ASK Laboratories within third days of the applicable service. In no event shall applicable service, in or event shall ASK Laboratories within third days of the applicable service. In no event shall ASK Laboratories without limitation, business interruptions, loss of use, or loss of induting without limitation, business interruptions, loss of use, or loss of profits incurred by the client, its subsidiaries, affillates, or successors of a stated reasons or otherwise.	Remarks	alass	۲ ۱ ۱				~						If Yes, Amt. '/2	plain			
Please note: Lability and Damages. A exclusive remedy for any dalim arising exclusive remedy for any dalim arising tabut including those for amount paid b dearned walthout the complement be deerned walthout the day of the al Laboratories withthin thing days of the al ASK Laboratories leable for incid Laboratories without fimitation, buschress is profits incurred by the client, its sub arising our of or related to the perform arising un of or related to the perform arising un of or related to the perform arboratories, regardless of or otherwise.	Analysis Required Required	XIXIX	XXX	X X X								Q	If Yes, An	If No, Explain	Comments	7	
peb7	No. of Containers			1								, Xex	$\mathbf{k}$	5	<u>&gt;</u>	4	
of Custody Record <u>Renge Cuerting And Control</u> <u>Renge Cuerting And Control Anglon</u> <u>Ser Ficklin Ad Sou Anglon</u> <u>mnic Fology</u>	ole otion	SI	Sa	S3		1.380						Remarks:	Headspace	Property Sealed	Tamper Seal	Type of Container_	Additional Comments:
AIN No No No No No No No No No No No No No	Sample Description	23#30	23 # 3B	23 #3B	<b>J</b> .						L	Received by		Received by: (signature)			
Work Order Client Name Project 1.D./ Address		SCR	ScR		-							Time 1030	UD05	Time		:	
70EKF0	Composite Grab	×	X	×													
<b>rries</b> (wikl 4425 454	Matrix	Soil		~								Date 4-13-04	goit 1-4	Date			
<b>ASK Laboratories</b> Analytical Services Kwikl 5935 Glenoak Lane Amarillo, Texas 79109 Telephone: (806) 353-4425 Facsimile: (806) 352-6454	əmiT	9152									,	Ter and		E)		Sample	ray ior sample Lisposal (330 per 100 grams) Client's Signature
<b>ISK La</b> Analytical 5935 Gler Amarilo, ¹ Telephone Facsimile:	Date	4-13-06										Relipquished by: [Signature]	shed by Signature	Relinquished by: (Signature)	Client Agrees to:	Accept Returned Sample	ray ior sample Luis Client's Signature
	# əlqms2	0	02	03	04	05	90	07	08	60	0	E C	Relinquished by	Relinqui	Client /	Ŭ d	ġ ġ

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ASK	LAB	ORA	TOR	IES,	INC
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# Login Checklist

Order # 0604037

Shipping Method: <u>BUS</u> Date/Time of Receipt: <u>4-14 0705</u>

Cooler Check

Shipping Container	Ice in Cooler			Custody Seal			ચ 🛛	
	If N		If No,	Pres	Present?		act?	Tracking Number
	Yes	No	Temperature	Yes	No	Yes	No	_
Core	K				X			

Note: If the temperature of a cooler/sample is above 6°C fill out NCR.

<b>Custody Seals on Bottles Present:</b>	Yes	No <u>×</u>
If Yes, is it intact?	Yes	No
If Not intact, fill out NCR		
<b>Condition of Containers:</b>		
Loose Caps:	Yes	No
If Yes, fill out NCR		
		$\mathbf{K}$
Broken Containers:	Yes	No
If Yes, fill out NCR		
Chain of Custody Included:	Yes	No
If Yes, verify receipt of all containers listed a		
and Date COC and fill out laboratory boxes.	*	1 0
Acid Preserved Samples: pH =2<br If No, fill out NCR	Yes	No
Base Preserved Samples: pH>/=12 If No, fill out NCR	Yes	No
Coolers Unpacked/Checked by:		Date: <u>4 79</u>
NCRs (y/n):	Faxed Conf	irmation (y/n):

5935 Glenoak Lane Amarillo, TX 79109

### Site Photographs SCB 23-3 4-13-2006



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# ASK Laboratories, Inc.

Analytical Services Kwik!

#### ASK LABORATORIES, INC. 5935 GLENOAK LANE AMARILLO, TEXAS 79109

Attn: CUSTOMER SERVICES Phone: (806) 353-4425

WHITE BUFFALO ENVIRO. SERVICE 5425 BEN FICKLIN ROAD SAN ANGELO, TX 76904

Attn: GREG SWINDLE

Invoice Number:

Order #: 06-05-091 Date: 05/30/06 13:15 Work ID: RANGE SCB 23-3/S1 THRU S3 Date Received: 05/24/06 Date Completed: 05/30/06 Client Code: WHITE_BUFF

#### SAMPLE IDENTIFICATION

Sample	Sample					
<u>Number</u>	Description					
01	SCB	23-3	S1			
02	SCB	23-3	S2			

Sample	Sample						
Number	Description						
03	SCB	23-3	<b>S</b> 3				

Certified By

Alan D. King

5935 Glenoak Lane Amarilio, Texas 79109 Telephone (806) 353-4425 Toll Free 1-800-423-9443 Facsimile (806) 352-6454

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<u>By</u> JAC

BNH

BNH BNH BNH

KDJ KDJ KDJ

# ASK Laboratories, Inc.

### Analytical Services Kwik!

Order # 06-05-091 05/30/06 13:15	ASK LABORATORIE	S, INC.		Page 2	
	TEST RESULTS	BY SAMPLE			
Sample: 01A SCB 23-3 S1	Co	llected: 05/2	2/06 10:40		
<u>Test Description</u> PERCENT SOLIDS DRY WEIGHT	<u>Result</u> 99.25	SQL	<u>Units</u> wt % solids	<u>Analyzed</u> 05/24/06	<u>]</u> 2
CHLORIDE ON SOLIDS	4900	5.0	mg/kg	05/25/06	ł
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	<29.8	29.8	mg/kg	05/26/06	F
TPH C12-C28 - DRO	132	29.8	mg/kg	05/26/06	F
TPH C28-C35	<29.8	29.8	mg/kg	05/26/06	I
BTEX					
BENZENE	<0.020	0.020	mg/kg	05/25/06	3
TOLUENE	<0.020	0.020	mg/kg	05/25/06	ł
ETHYLBENZENE	<0.020	0.020	mg/kg	05/25/06	F
XYLENE	<0.020	0.020	mg/kg	05/25/06	F
Surrogates					
BROMOFLUOROBENZENE	91	Min: 80	Max:	120	

Sample: 02A SCB 23-3 S2

#### Collected: 05/22/06 10:43

Test Description PERCENT SOLIDS DRY WEIGHT	<u>Result</u> 98.07	SOL	<u>Units</u> wt % solids	<u>Analyzed</u> <u>By</u> 05/24/06 JAC
CHLORIDE ON SOLIDS	4280	5.0	mg/kg	05/25/06 BNH
Total Petroleum Hydrocarbons				
TPH C6-C12 - GRO	<31.2	31.2	mg/kg	05/26/06 BNH
TPH C12-C28 - DRO	199	31.2	mg/kg	05/26/06 BNH
TPHC28-C35	<31.2	31.2	mg/kg	05/26/06 BNH
BTEX				
BENZENE	<0.015	0.015	mg/kg	05/25/065935 Brenoak Lane
TOLUENE	<0.015	0.015	mg/kg	05/25/QmarillSDT5xas 79109
ETHYLBENZENE	<0.015	0.015	mg/kg	05/2059/eph6one K2005)353-4425
XYLENE	<0.015	0.015	mg/kg	05/25710F8ee 1K-1800-423-9443
Surrogates				Facsimile (806) 352-6454
BROMOFLUOROBENZENE	95	Min: 80	Max:	120

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# ASK Laboratories, Inc.

### Analytical Services Kwik!

Order # 06-05-091 05/30/06 13:15	ASK LABORATORIE	S, INC.		Page 3	
	TEST RESULTS	BY SAMPLE			
Sample: 03A SCB 23-3 S3	Co	llected: 05/2	2/06 10:45		
Test Description	Result	SQL	<u>Units</u>	<u>Analyzed</u>	By
PERCENT SOLIDS DRY WEIGHT	98.11		wt % solids	05/24/06	JAC
CHLORIDE ON SOLIDS	4440	5.0	mg/kg	05/25/06	BNH
Total Petroleum Hydrocarbons	;				
TPH C6-C12 - GRO	<30.8	30.8	mg/kg	05/26/06	BNH
TPH C12-C28 - DRO	179	30.8	mg/kg	05/26/06	BNH
TPH C28-C35	<30.8	30.8	mg/kg	05/26/06	BNH
BTEX					
BENZENE	<0.015	0.015	mg/kg	05/25/06	KDJ
TOLUENE	<0.015	0.015	mg/kg	05/25/06	KDJ
ETHYLBENZENE	<0.015	0.015	mg/kg	05/25/06	KDJ
XYLENE	<0.015	0.015	mg/kg	05/25/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	98	Min: 80	Max:	120	

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# ASK Laboratories, Inc.

### Analytical Services Kwik!

Order # 06-05-091 05/30/06 13:15	ASK	LABORAT	ORIES, INC	2.	:	Page 4
		·	QA/QC INFO	ORMATION		
	LCS	MS	MSD	RPD	BLANK	
BENZENE	103%	103%	109%	5.0%	bdl	
TOLUENE	95%	90%	988	7.48	bdl	
ETHYLBENZENE	101%	104%	113%	8.1%	bdl	
m,p-XYLENES	103%	103%	114%	9.8%	bdl	
O-XYLENE	99%	103%	116%	11.8%	bdl	
TX1005	-LCS	MS	MSD	RPD	BLANK	
TPH	106%	93%	84%	9.3%	bdl	
COMPOUND	RPD	SPIKE	RECOVERY	QC RECOV	ERY BLANK	
CHLORIDE	0.2%		918	93%	bdl	

bdl=below detectable levels

5935 Glenoak Lane Amarillo, Texas 79109 Telephone (806) 353-4425 Toll Free 1-800-423-9443 Facsimile (806) 352-6454

# ASK Laboratories, Inc.

### Analytical Services Kwik!

Order # 06-05-091 05/30/06 13:15

#### ASK LABORATORIES, INC.

TEST NAME : CHLORIDE ON SOLID

Page 5

TEST METHODOLOGIES

TEST CODE : SOLIDS

REFERENCE CLP PROTOCOL/ SECTION IV/ PART F

TEST CODE : 8015N TEST NAME : TRPH-8015M (GRO, DRO, C28-35)

METHOD 8015M GCFID GAS CHROMATOGRAPHY WITH FLAME-IONIZATION DETECTOR. SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.

TEST NAME : PERCENT SOLIDS FOR DRY WT CORRECTIONS

TEST CODE : BTEX TEST NAME : BTEX

METHOD 8260 GC/MS GAS CHROMATOGRAPHY WITH MASS-SELECTIVE DETECTOR. SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.

TEST CODE : CL SOL

METHOD 300.0 : ION CHROMATOGRAPHY METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES, EPA-600/4-79-020

METHOD 9056 ION CHROMATOGRAPHY SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.

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<b>ECOTO</b> Please note: Liability and Damages. ASK Laboratories liability and clients exclusive remedy for any claim arising whither based in contract or tor, shall be imited to the amount paid by the client for the analyses. All claims, incluing those for negligence and other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories within thirty days of the applicable service. In no event shall be deemed waived unless made in writing and received by ASK Laboratories within thirty days of the applicable service. In no event shall be deemed waived unless made in writing and received by ASK Laboratories within thirty days of the applicable service. In no event shall be deemed waived unless made in writing and received by ASK Laboratories regardless of whether such claims is based upon any of the preceding stated reasons or otherwise.			Theartrace No	Property Sealed X If No, Explain Chilled to 40° F X If No, Explain Tamper Seal X Comments Type of Container X A 5 S Additional Comments:
Chain of Custody Record Work Order No. Vork Order No. Client Name White Buitfalo Environmenta Project I.D./Location RANGE Adress 5425 Ben Ficklin Rd. SanArigelo Telephone (325) 651 9054 Sampled By Ronnie Taylor	Sample Description SCB 23-3 5/ SCB 73-3 52	SCB23-3 53	Time OOA Received by Ustruatine	16:30-BUS Time 5 Received by: [signature]
	X X Grab			200
<b>) ries</b> Kwik! 9 3454	- Q. Matrix	<b>&gt;</b>	Date Date	$\frac{5/23}{246}$
ASK Laboratories Analytical Services Kwik! 5935 Glenoak Lane Amarilo, Texas 79109 Telephone: (806) 353-4425 Facsimile: (806) 352-6454	9miT 01 6 4 6	10.45		1 Sample Disposal (530 pe
Analytica Analytica 5935 Gle Amarillo, Telephor Facsimile	- <u>17</u> Date	$\rightarrow$	all the by Nicitation	Relinquished by: (Signature) Relinquished by: (Signature) Client Agrees to: Accept Returned Sample Pay for sample Disposal (530 per 100 grams) Client's Signature
4 4	# 9lqms2 2 2	03 05 05 07	09 09 Relingt	Relinque Action

Page 149 of 171

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#### **ASK LABORATORIES, INC**

# Login Checklist

Order # 0605093

Shipping Method: Bus

Date/Time of Receipt:___

5-24-06 B:Som

Cooler Check								
		Ice i	n Cooler	· ·	Custo	dy Sea	al	
Shipping Container			If No,	Pres	ent?	Int	act?	Tracking Number
	Yes	No	Temperature	Yes	No	Yes	No	
Cooler	X				X			828796
								·

Note: If the temperature of a cooler/sample is above 6°C fill out NCR.

<b>Custody Sea</b>	s on Bottles Present:	Yes_X_	No No
	If Yes, is it intact?	Yes 🗙	No
	If Not intact, fill out NCR	· .	
Condition of	Containers:		
	Loose Caps:	Yes	No_X_
	If Yes, fill out NCR	······	
	Broken Containers:	Yes	NoX
	If Yes, fill out NCR		<u>-</u>
If Yes, verify	tody Included: receipt of all containers listed C and fill out laboratory boxes		
Acid Preserv	ed Samples: pH =2<br If No, fill out NCR	Yes	No
Base Preserve	ed Samples: pH>/=12 If No, fill out NCR	Yes	No
Coolers Unpa	cked/Checked by: <u>5.</u>	ing	Date: $5-24-06$
NCRs (v/n):	4	Faxed Cor	firmation (v/n).

5935 Glenoak Lane Amarillo, TX 79109



#### Range New Mexico 5-17-06 Spill Cleanup Loving, Eddy County, New Mexico



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### Range New Mexico 5-17-06 Spill Cleanup Loving, Eddy County, New Mexico



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		P.O. Box 3		ew Mexico 8824	1-0388		
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			www.chhoi	JDS.COM			
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C138					List Description	on Below	
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### Bratcher, Mike, EMNRD

From:	Bratcher, Mike, EMNRD
Sent:	Tuesday, February 05, 2013 4:03 PM
То:	'Jerusha Rawlings'
Subject:	RE: Unresolved well compliance/spill data

Jerusha,

As we discussed, I believe the 2006 releases attributed to the Candelario #1 actually occurred at the battery for this SWD. The battery is located on the South Culebra Bluff #6 well site. While I was unable to locate any documentation that would allow me to close it out, I do not believe these releases should be of concern.

The South Culebra Bluff #4, I was able to locate documentation that will allow for this incident to be closed out.

The status of the remaining incidents is pretty much unknown. I was unable to locate any documentation that would allow for closure of any of them. The 1999 entry for the South Culebra Bluff 23 #11, I believe is a non-incident.

Hope this helps some.

Mike Bratcher NMOCD District 2 811 S. First Street Artesia, NM 88210 O: 575-748-1283 X108 C: 575-626-0857 F: 575-748-9720

From: Jerusha Rawlings [mailto:jrawlings@glenvironmental.com] Sent: Monday, January 28, 2013 2:58 PM To: Bratcher, Mike, EMNRD Subject: Unresolved well compliance/spill data

Mike,

Thanks for taking the time to look at these. The incidents I have questions about are listed below with the wells' API numbers.

Candelario #001 (30-015-26536)

• 10/6/2006 – a release of oil (all recovered) due to human error. No groundwater was affected, but no closure information was available from OCD online.

• 10/10/2006 – a release of oil (15 bbl unrecovered) due to human error. No groundwater was affected, but no closure information was available from OCD online.

South Culebra Bluff #004 (30-015-22931)

• 3/7/2009 – a release of produced water (10 bbl unrecovered) due to a fatigued check valve on the well head. According to OCD documents, immediate action was taken, including sampling and analysis of produced water. OCD requested a work plan for further delineation of all constituents of concern. No other information is available and the disposition of the affected area in unknown.

#### South Culebra Bluff #006 (30-015-23339)

• 7/15/2005 – a release of oil and produced water (20 bbl unrecovered) due to a "water dump valve malfunction on the heater treater dumping water to oil tank." The produced water and oil was contained inside the fenced berm area and recovered by a vacuum truck. The remaining fluids were spread with sand to soak up the oil, but it is not clear whether the sand was disposed of or left in place. During an inspection, it was noted that the north side of the tank battery was covered with fresh soil to an average depth of approximately 6 inches, but contaminated soils remain below the clean soils. A soil sample was taken, but the disposition of the case is unknown.

#### South Culebra Bluff #003 (30-015-22700)

• 1/25/2011 – a release of produced fluids (40 bbl unrecovered, water/oil proportion unspecified) due to failure of a tank union. According to form C-141, the area affected was inside the firewalls of the tank battery. The disposition of the affected soil is unknown.

South Culebra Bluff 23 #011 (30-015-26346)

• 7/21/1999 – Other than its listing under the "Complaints, Incidents and Spills" section of OCD's well information page, no other information was available.

• 8/21/2006 – a release of oil (5 bbl unrecovered) due to failure of a valve on the pump jack. According to form C-141, a vacuum truck was called immediately and recovered 10 bbl. Approximately 5 bbl soaked into ground. The disposition of this soil is unknown.

Regards,

Jerusha Rawlings, PhD



GL Environmental, Inc. (505) 508-2419 Albuquerque office (505) 385-9594 cell (505) 454-0830 Las Vegas office (505) 454-8093 fax

### Hamlet, Robert, EMNRD

From:	Hamlet, Robert, EMNRD
Sent:	Thursday, September 12, 2019 8:34 AM
То:	'steve.rice@arcadis.com'
Cc:	Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Billings, Bradford, EMNRD
Subject:	Closure Report Denied - Chevron - South Culebra Bluff Unit 3 - (2RP-3984) 1-11-2006
Attachments:	Closure Report Denied - Chevron - South Culebra Bluff Unit 3 - (2RP-3984) 9.11.19.pdf

Steve,

We have received your closure report for 2RP-3984 South Culebra Bluff Unit 3, thank you. This closure is denied.

After looking at various resources, the location appears to be <50' DTW. After checking the NM OCD Environmental Map, there are multiple wells within a 1/2 mile radius of the South Culebra Bluff Unit 3 location with DTW measurements of 12', 31', 38.2', 16.34', 47', 31', 36'. There is no justification in the report that the well is 52' DTW. White Buffalo Environmental Services went back multiple times, all samples were substantially over the limits required for <50' DTW closure. It seems like the spill never had a comprehensive remediation plan.

The closure limits for a spill that is <50' DTW is:

$\leq$ 50 feet	Chloride***	EPA 300.0 or SM4500 Cl B	600 mg/kg
	TPH (GRO+DRO+MRO)	EPA SW-846 Method 8015M	100 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8260B	10 mg/kg

Please review and resubmit all documentation as required for a remediation plan.

Please submit:

- 1. Scaled site map diagram
- 2. Site Photos
- 3. Site Assessment/Delineation summary (horizontal and vertical)
- 4. Delineation sample analytical results (lab tested)
- 5. Table containing analytical data
- 6. Description of proposed excavation depths corresponding to analytical table
- 7. Depth to groundwater evaluation, including fluid level data from New Mexico Office of the State Engineer or other documented evidence
- 8. Karst evaluation, here is the link to the CFO GIS data
- 9. FEMA National Flood map review.
- 10. Signed and dated C-141 (Pages 3-5)

If you need assistance, the current spill rule may be viewed here: <u>http://164.64.110.134/parts/title19/19.015.0029.html</u>

Please let me know if you have any further questions.

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Regards,

Robert J Hamlet State of New Mexico Energy, Minerals, and Natural Resources Oil Conservation Division 811 S. First St., Artesia NM 88210 (575) 748-1283 Robert.Hamlet@state.nm.us

District I 1625 N. French Dr., Hobbs, NM 88240 Phone:(575) 393-6161 Fax:(575) 393-0720 District II

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District IV 1220 S. St Francis Dr., Santa Fe, NM 87505 Phone: (505) 476-3470 Fax: (505) 476-3462

## **State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division** 1220 S. St Francis Dr. Santa Fe, NM 87505

CONDITIONS

Operator: CHEVRON U S A INC 6301 Deauville Blvd	OGRID: 4323
Midland, TX 79706	Action Number: 384027
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)
CONDITIONS	

Created By		Condition Date
amaxwell	Historical document upload.	9/16/2024

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Action 384027