

February 2, 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
#iCLB0534948599, South Culebra Bluff (SCB) 23 No. 004

Chronology

On December 16, 2005 a letter of violation was issued to Range Operating New Mexico, Inc. (Range) for violations identified during a random / periodic inspection on December 15, 2005. The letter was received by the Range office on December 27, 2005. White Buffalo Environmental Services, Inc (WBESI) was notified via fax of this violation on December 27, 2005. Greg Swindle of WBESI contacted Rudy Garcia field foreman for Range –Loving office to discuss response actions. Upon notification from NMOCD Mr. Garcia responded to the location by contacting a work crew to begin excavation unaware that a work plan needed to be filed and approved prior to initiating work on this site. Mr. Swindle went to the field and reviewed activities in the field on January 5, 2006. Excavation of the entire area inside the secondary containment of this location had begun and was almost completed. 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 each site.

On January 11, 2006, Greg Swindle of WBESI met with Chris Beadle of NMOCD for the purposes of sampling the site to determine if remediation was complete. The lab results were obtained from the analyses provided by ASK Laboratories of Amarillo, Texas, and compared to the remediation action levels based upon the site score and ranking. The results indicated that the North Wall and the East wall of the area are below action levels and remediation may cease in these areas. The West Wall sample was only slightly above the TPH action limits and only slight enlargement will be required in this area. The South and Floor area require significantly more activity.

The following is an updated "Remediation Work Plan" for each site:

South Culebra Bluff (SCB) 23 No.004

General site characteristics

Depth to Ground Water: 92'

Wellhead Protection Area: 646' to closest well

Distance to Nearest Surface Water Body: 1.4 miles

Site ranking score 30

Soil remediation action levels

Highly Contaminated / Saturated Soils
Benzene 10 ppm, BTEX 50ppm, TPH 100 ppm

Soil remediation methods

Excavation and disposal (or alternative approved onsite remediation)

Planned analytical testing

BTEX, TPH, Chlorides on soil

Work Plan

- Continue excavation in the Westerly direction by one foot.
- Remove all tanks from the location as this site will not be returned to battery usage.
- Excavate the tank area to the depth of the original excavation.
- Excavate the Southern ½ of the area a minimum of 2 more feet.
- Excavate further in a Southerly direction a minimum of 4 feet. (This may require the relocation of the current spoils pile.)
- The site will then be evaluated for further sampling.
- 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 17, 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.

Please see site drawing for additional details.

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



Greg Swindle,
President
WBESI

Enclosures:

Site drawing

Site Photographs

Laboratory Report

ASK Laboratories, Inc.

Analytical Services Kwikl

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

Purchase Order: RANGE OPERATING N.M.
Invoice Number: SCB-23-4

Verification

Order #: 06-01-040
Date: 01/23/06 08:43
Work ID: SOIL SAMPLES
Date Received: 01/16/06
Date Completed: 01/20/06

Client Code: WHITE_BUFF

SAMPLE IDENTIFICATION

<u>Sample Number</u>	<u>Sample Description</u>	<u>Sample Number</u>	<u>Sample Description</u>
01	SPOILS	05	WEST
02	SOUTH	06	COMP FLOOR
03	EAST	07	SCB 23'6 FLOOR AFTER REMD
04	NORTH		



Certified By
Alan D. King

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Order # 06-01-040
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TEST RESULTS BY SAMPLE

Sample: 01A SPOILS

Collected: 01/11/06 10:40

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	97.80		wt % solids	01/16/06	BJP
CHLORIDE	2310	100	mg/kg	01/17/06	BNH
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	263	63.1	mg/kg	01/18/06	BNH
TPH C12-C28 - DRO	7570	63.1	mg/kg	01/18/06	BNH
TPH C28-C35	1690	63.1	mg/kg	01/18/06	BNH
BTEX					
BENZENE	<0.020	0.020	mg/kg	01/16/06	KDJ
TOLUENE	<0.020	0.020	mg/kg	01/16/06	KDJ
ETHYLBENZENE	<0.020	0.020	mg/kg	01/16/06	KDJ
XYLENE	<0.020	0.020	mg/kg	01/16/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	117	Min: 80		Max: 120	

Sample: 02A SOUTH

Collected: 01/11/06 10:42

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	98.90		wt % solids	01/16/06	BJP
CHLORIDE ON SOLIDS	1890	50	mg/kg	01/17/06	BNH
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	<60.5	60.5	mg/kg	01/18/06	BNH
TPH C12-C28 - DRO	3600	60.5	mg/kg	01/18/06	BNH
TPH C28-C35	1070	60.5	mg/kg	01/18/06	BNH
BTEX					
BENZENE	<0.020	0.020	mg/kg	01/16/06	KDJ
TOLUENE	<0.020	0.020	mg/kg	01/16/06	KDJ
ETHYLBENZENE	<0.020	0.020	mg/kg	01/16/06	KDJ
XYLENE	<0.020	0.020	mg/kg	01/16/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	118	Min: 80		Max: 120	

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TEST RESULTS BY SAMPLE

Sample: 03A EAST

Collected: 01/11/06 10:44

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	92.12		wt % solids	01/16/06	BJP
CHLORIDE ON SOLIDS	1840	50	mg/kg	01/17/06	BNH
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	<33.6	33.6	mg/kg	01/18/06	BNH
TPH C12-C28 - DRO	<33.6	33.6	mg/kg	01/18/06	BNH
TPH C28-C35	<33.6	33.6	mg/kg	01/18/06	BNH
BTEX					
BENZENE	<0.022	0.022	mg/kg	01/16/06	KDJ
TOLUENE	<0.022	0.022	mg/kg	01/16/06	KDJ
ETHYLBENZENE	<0.022	0.022	mg/kg	01/16/06	KDJ
XYLENE	<0.022	0.022	mg/kg	01/16/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	105	Min: 80		Max: 120	

Sample: 04A NORTH

Collected: 01/11/06 10:46

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	96.50		wt % solids	01/16/06	BJP
CHLORIDE ON SOLIDS	134	10	mg/kg	01/17/06	BNH
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	<31.7	31.7	mg/kg	01/18/06	BNH
TPH C12-C28 - DRO	<31.7	31.7	mg/kg	01/18/06	BNH
TPH C28-C35	<31.7	31.7	mg/kg	01/18/06	BNH
BTEX					
BENZENE	<0.021	0.021	mg/kg	01/16/06	KDJ
TOLUENE	<0.021	0.021	mg/kg	01/16/06	KDJ
ETHYLBENZENE	<0.021	0.021	mg/kg	01/16/06	KDJ
XYLENE	<0.021	0.021	mg/kg	01/16/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	110	Min: 80		Max: 120	

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TEST RESULTS BY SAMPLE

Sample: 05A WEST

Collected: 01/11/06 10:48

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	98.23		wt % solids	01/16/06	BJP
CHLORIDE ON SOLIDS	534	10	mg/kg	01/17/06	BNH
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	<33.7	33.7	mg/kg	01/18/06	BNH
TPH C12-C28 - DRO	145	33.7	mg/kg	01/18/06	BNH
TPH C28-C35	<33.7	33.7	mg/kg	01/18/06	BNH
BTEX					
BENZENE -	<0.020	0.020	mg/kg	01/16/06	KDJ
TOLUENE	<0.020	0.020	mg/kg	01/16/06	KDJ
ETHYLBENZENE	<0.020	0.020	mg/kg	01/16/06	KDJ
XYLENE	<0.020	0.020	mg/kg	01/16/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	106	Min: 80		Max: 120	

Sample: 06A COMP FLOOR

Collected: 01/11/06 10:52

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	90.97		wt % solids	01/16/06	BJP
CHLORIDE ON SOLIDS	1430	50	mg/kg	01/17/06	BNH
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	87.7	42.6	mg/kg	01/18/06	BNH
TPH C12-C28 - DRO	2940	42.6	mg/kg	01/18/06	BNH
TPH C28-C35	656	42.6	mg/kg	01/18/06	BNH
BTEX					
BENZENE	<0.022	0.022	mg/kg	01/16/06	KDJ
TOLUENE	<0.022	0.022	mg/kg	01/16/06	KDJ
ETHYLBENZENE	<0.022	0.022	mg/kg	01/16/06	KDJ
XYLENE	<0.022	0.022	mg/kg	01/16/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	108	Min: 80		Max: 120	

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TEST RESULTS BY SAMPLE

Sample: 07A SCB 23'6 FLOOR AFTER REMD Collected: 01/11/06 12:01

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	93.69		wt % solids	01/16/06	BJP
CHLORIDE ON SOLIDS	190	10	mg/kg	01/17/06	BNH
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	5080	347	mg/kg	01/18/06	BNH
TPH C12-C28 - DRO	40700	347	mg/kg	01/18/06	BNH
TPH C28-C35	6570	347	mg/kg	01/18/06	BNH
BTEX					
BENZENE	<0.025	0.025	mg/kg	01/16/06	KDJ
TOLUENE	0.282	0.025	mg/kg	01/16/06	KDJ
ETHYLBENZENE	0.550	0.025	mg/kg	01/16/06	KDJ
XYLENE	3.10	0.025	mg/kg	01/16/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	110	Min: 80		Max: 120	

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QA/QC INFORMATION

	LCS	MS	MSD	RPD	BLANK
BENZENE	97%	89%	82%	7.5%	bdl
TOLUENE	102%	81%	89%	10.1%	bdl
ETHYLBENZENE	102%	86%	94%	8.0%	bdl
o-XYLENE	102%	88%	95%	8.2%	bdl
m,p-XYLENES	103%	87%	97%	10.9%	bdl
TX1005	LCS	MS	MSD	RPD	BLANK
TPH	97%	87%	89%	1.9%	bdl
CHLORIDE	RPD	SPIKE RECOVERY	QC RECOVERY	BLANK	
	0.9%	100%	104%	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

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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Chain of Custody Record

Work Order No. _____
 Client Name White Buffalo Environmental
 Project I.D./Location Range Operating New Mexico
 Address 5425 Ben Franklin Rd. San Angelo, TX 76901
 Telephone (325) 651-9054
 Sampled By Greg Swindle

Please note: Liability and Damages. ASK Laboratories 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 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 thirty days of the applicable services. In no event shall ASK Laboratories be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by the client, its subsidiaries, affiliates, or successors out of or related to the performance of services rendered by ASK Laboratories, regardless of whether such claims is based upon any of the preceding stated reasons or otherwise.

Sample #	Date	Time	Matrix	Composite	Grab	Sample Description	No. of Containers	Analysis Required		Remarks
								BTEX	NMTRPH	
01	1/11/06	10:40	SOIL	X	X	Spills	1	X	X	
02		10:42		X		South	1	X	X	
03		10:44		X		East	1	X	X	
04		10:46		X		North	1	X	X	
05		10:48		X		West	1	X	X	
06		10:52		X		Comp Floor	1	X	X	
07		12:01		X		SCB 23' 6 Floor After "Remd"	1	X	X	
08										
09										
10										

Relinquished by: (Signature)	Date	Time	Received by: (Signature)
<i>[Signature]</i>	1/13/06	10:30	<i>[Signature]</i>
Relinquished by: (Signature)	Date	Time	Received by: (Signature)
<i>[Signature]</i>	1/13/06	16:30	<i>[Signature]</i>
Relinquished by: (Signature)	Date	Time	Received by: (Signature)
<i>[Signature]</i>	1/14/06	9:30	<i>[Signature]</i>

Client Agrees to:

Accept Returned Sample

Pay for sample Disposal (\$30 per 100 grams)

Client's Signature _____

Remarks:

Headspace	Yes	No
Property Sealed	X	
Chilled to 40° F	X	
Tamper Seal		X

If Yes, Amt. 50 L
 If No, Explain _____
 If No, Temp. 22°C
 Comments GLASS w/ TEFLO

Type of Container _____
 Additional Comments: _____

Login Checklist

Order # 0601040

Shipping Method: Bus Date/Time of Receipt: 1/14/06 0930

Cooler Check

Shipping Container	Ice in Cooler			Custody Seal				Tracking Number
	Yes	No	If No, Temperature	Present?		Intact?		
				Yes	No	Yes	No	
<u>COOLER</u>	<u>X</u>				<u>X</u>			<u>822745</u>

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

Custody Seals on Bottles Present: Yes No X
 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 No X
 If Yes, fill out NCR

Chain of Custody Included: Yes X No
 If Yes, verify receipt of all containers listed and all required fields are complete. Sign and Date COC and fill out laboratory boxes. Document any discrepancies on NCR.

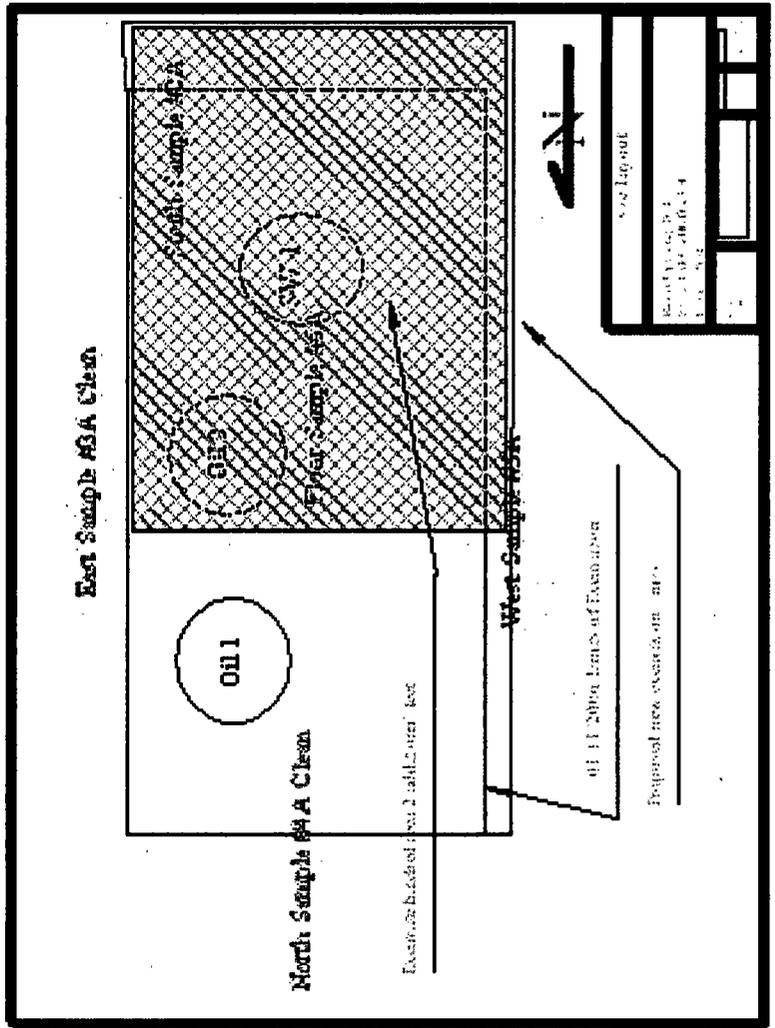
Acid Preserved Samples: pH <= 2 Yes No
 If No, fill out NCR

Base Preserved Samples: pH >= 12 Yes No
 If No, fill out NCR

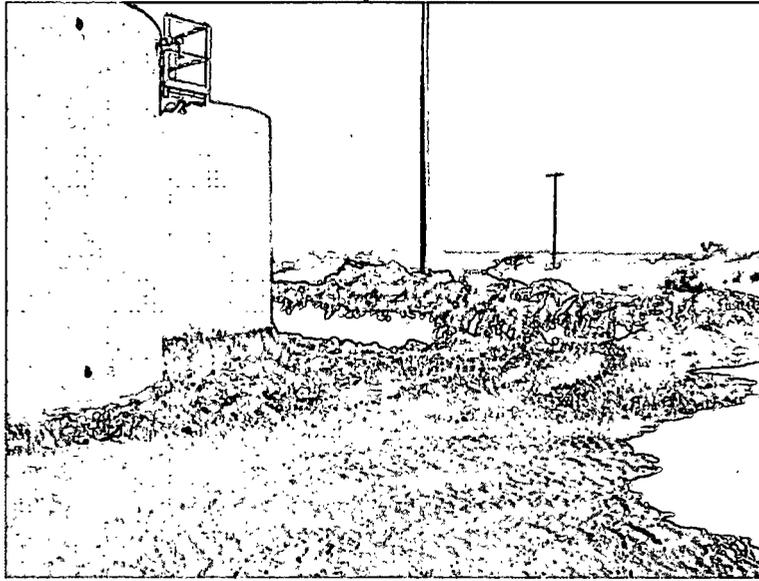
1/14
50115

Coolers Unpacked/Checked by: TWC Date: 1/14/06

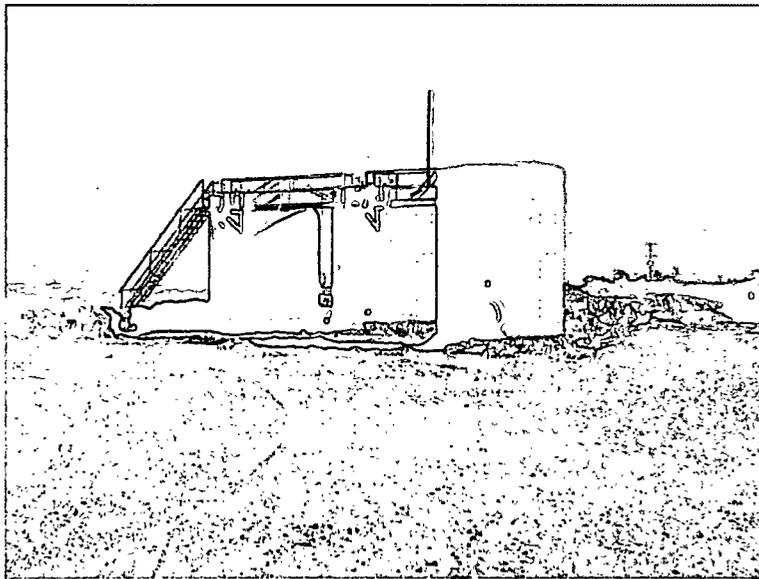
NCRs (y/n): N Faxed Confirmation (y/n):



Site Photographs
Range NM SCB 23-4 remediation site
January 11, 2006

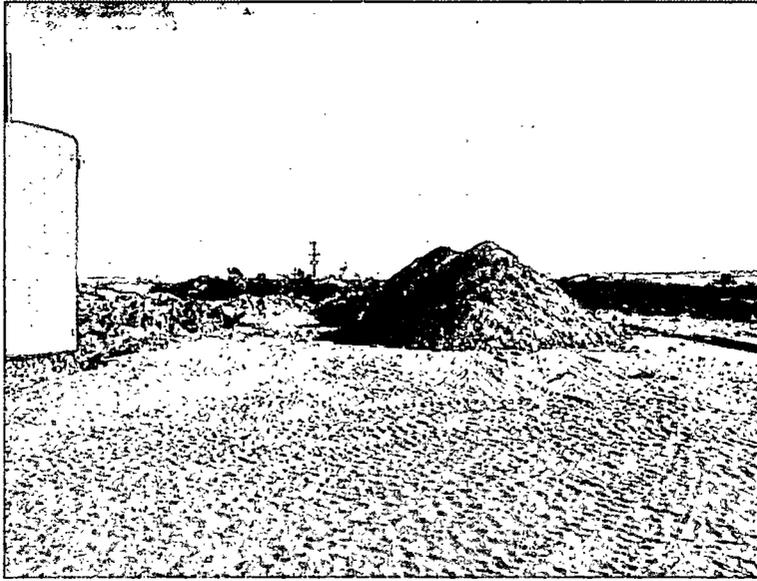


Southeast corner of remediation area



Front view of site

Site Photographs
Range NM SCB 23-4 remediation site
January 11, 2006



South area with spoils