

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
#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. Mr. Swindle went to the field and reviewed activities in the field on January 5, 2006. 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. Samples were collected from the floor area, South wall, and West wall of the spill site. These 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.

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

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

Purchase Order: ~~RANER 80823~~ #4
Invoice Number:

Order #: 06-03-132
Date: 04/06/06 09:46
Work ID: SOIL SAMPLES
Date Received: 03/31/06
Date Completed: 04/06/06

Client Code: WHITE_BUFF

SAMPLE IDENTIFICATION

<u>Sample Number</u>	<u>Sample Description</u>
01	SOUTH WALL
02	WEST WALL

<u>Sample Number</u>	<u>Sample Description</u>
03	FLOOR



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

ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-03-132

ASK LABORATORIES, INC.

Page 2

04/06/06 09:46

TEST RESULTS BY SAMPLE

Sample: 01A SOUTH WALL

Collected: 03/29/06 09:00

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	89.55		wt % solids	03/31/06	BJP
CHLORIDE ON SOLIDS	1110	100	mg/kg	03/31/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<81.8	81.8	mg/kg	04/05/06	BNH
TPH C12-C28 - DRO	1050	81.8	mg/kg	04/05/06	BNH
TPH C28-C35	143	81.8	mg/kg	04/05/06	BNH
BTEX					
BENZENE	<0.022	0.022	mg/kg	04/03/06	KDJ
TOLUENE	<0.022	0.022	mg/kg	04/03/06	KDJ
ETHYLBENZENE	<0.022	0.022	mg/kg	04/03/06	KDJ
XYLENE	<0.022	0.022	mg/kg	04/03/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	107	Min: 80		Max: 120	

Sample: 02A WEST WALL

Collected: 03/29/06 09:00

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	89.53		wt % solids	03/31/06	BJP
CHLORIDE ON SOLIDS	2040	100	mg/kg	03/31/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<36.7	36.7	mg/kg	04/05/06	BNH
TPH C12-C28 - DRO	553	36.7	mg/kg	04/05/06	BNH
TPH C28-C35	57.3	36.7	mg/kg	04/05/06	BNH
BTEX					
BENZENE	<0.025	0.025	mg/kg	04/03/06	KDJ
TOLUENE	<0.025	0.025	mg/kg	04/03/06	KDJ
ETHYLBENZENE	<0.025	0.025	mg/kg	04/03/06	KDJ
XYLENE	<0.025	0.025	mg/kg	04/03/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	108	Min: 80		Max: 120	

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 # 06-03-132
04/06/06 09:46

ASK LABORATORIES, INC.

Page 3

TEST RESULTS BY SAMPLE

Sample: 03A FLOOR

Collected: 03/29/06 09:00

Test Description	Result	SQL	Units	Analyzed	By
PERCENT SOLIDS - DRY WT.	89.80		wt % solids	03/31/06	BJP
CHLORIDE ON SOLIDS	1290	100	mg/kg	03/31/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<168	168	mg/kg	04/05/06	BNH
TPH C12-C28 - DRO	3370	168	mg/kg	04/05/06	BNH
TPH C28-C35	182	168	mg/kg	04/05/06	BNH
BTEX					
BENZENE	<0.022	0.022	mg/kg	04/03/06	KDJ
TOLUENE	<0.022	0.022	mg/kg	04/03/06	KDJ
ETHYLBENZENE	<0.022	0.022	mg/kg	04/03/06	KDJ
XYLENE	<0.022	0.022	mg/kg	04/03/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	113	Min: 80		Max: 120	

QA/QC INFORMATION

	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	BLANK
TPH	95%	94%	92%	2.3%	bdl

COMPOUND	RPD	SPIKE RECOVERY	QC RECOVERY	BLANK
CHLORIDE	0.9%	91%	94%	bdl

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

bdl = below detectable levels

ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-03-132
04/06/06 09:46

ASK LABORATORIES, INC.

Page 4

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,

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

ASK Laboratories

Analytical Services Kwiki

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

Chain of Custody Record

Work Order No. _____
 Client Name White Buffalo Environmental
 Project I.D./Location Range Operating SCB 23 #4
 Address 5425 Ben Ficklin Rd. San Angelo, TX 76904
 Telephone (325) 651-9054
 Sampled By Ronnie Taylor

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 service. 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 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 preceding stated reasons or otherwise.

Sample #	Date	Time	Matrix	Composite	Grab	Sample Description	No. of Containers	Analysis Required	Remarks
01	3/29/06	9:00A	soil	X	X	South Wall	1	X X X X	glass
02	↓	↓	↓	X	X	West Wall	1	X X X X	↓
03	↓	↓	↓	X	X	Floor	1	X X X X	↓
04									
05									
06									
07									
08									
09									
10									

Retinquished by: (signature)	Date	Time	Received by: (signature)
<i>[Signature]</i>	3/30/06	8:00A	<i>[Signature]</i>
Retinquished by: (signature)	Date	Time	Received by: (signature)
<i>[Signature]</i>	3/30/06	16:30 P	BUS
Retinquished by: (signature)	Date	Time	Received by: (signature)
<i>[Signature]</i>	3-31	0700	<i>[Signature]</i>

Headspace	Yes	No	If Yes, Amt. If No, Explain IF No, Temp. <u>WET ICE</u>
Properly Sealed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Chilled to 40° F	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Tamper Seal	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Comments

Remarks: _____
 Type of Container: _____
 Additional Comments: _____

Client Agrees to:
 Accept Returned Sample
 Pay for sample Disposal (\$30 per 100 grams)
 Client's Signature _____

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): <u>Range</u>		Project (Name): <u>South Culebra Bluff 23 #4</u>										
Address:		Location: <u>Loving, NM</u>										
City, State, Zip:												
Telephone:												
Fax:												
W.B.E.S. Lab No.	Date	Time	Comp. Grab.	Sample Description	No. of Samples	Type of Container	BTEX	TRPH N/M	RCRA Metals	TDS	PAH	CHLORIDES
06-	3/29	9:00	X	South Wall	1	glass	X	X				X
06-	↓	↓	X	West Wall	1	↓	X	X				X
06-	↓	↓	X	FLOOR	1	↓	X	X				X
06-												
06-												
06-												
06-												
06-												
06-												
06-												
06-												
Sampled By: <u>[Signature]</u>		Date:	3/29/06	Time:	9:00A	Temp.		Witnessed By:		Date:		Time:
Relinquished By: <u>[Signature]</u>		Date:	3/30/06	Time:	8:00A	Temp.		Received By:	<u>[Signature]</u>	Date:	3/30/06	Time:
Relinquished By: <u>[Signature]</u>		Date:	3/30/06	Time:	8:00A	Temp.		Received for Laboratory By:	<u>[Signature]</u>	Date:	3/30/06	Time:
Relinquished By: <u>[Signature]</u>		Date:	3/30/06	Time:	8:00A	Temp.		Signature...	<u>[Signature]</u>	Date:	3/30/06	Time:

Site Photographs
SCB 23-4
3-29-2006

