

GW - 028

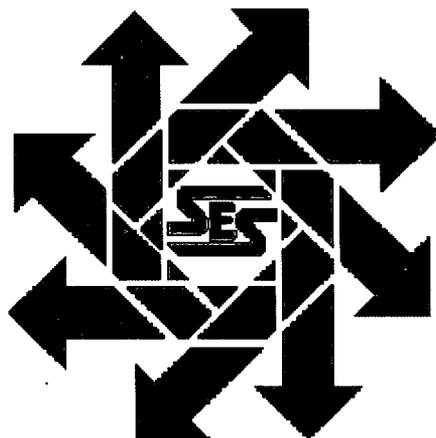
REPORTS

Year(s)

**ERS METX Artesia
Unit Closure
Report (5/2/2005)**

**Navajo Refining Company
ERS METX Artesia Unit
Amended Closure Report
Section 30, Township 18S, Range 28E
Eddy County, New Mexico**

May 2, 2005



Prepared for:

**Navajo Refining Company
311 W. Quay
Artesia, New Mexico 88210**

By:

***Safety & Environmental Solutions, Inc.
703 E. Clinton Suite 102
Hobbs, New Mexico 88240
(505) 397-0510***

**NAVAJO METEX
PROJECT # NAV-04-008
SAMPLING**

RECEIVED
MAY 23 2005
OIL CONSERVATION
DIVISION

Every sample taken witnessed by Mike Bratcher with the OCD.

- 04/08/05 Mike Bratcher was on site and said that he was not going to take any samples for that day because he (Mike) could still smell TPH in bottom hole of excavation #1, and see some staining on rocks of the east and west wall. There was also some contaminated soil to the east of excavation #1 that he wanted removed. Sergio Contreras took a grab sample of bottom hole of excavation #1 and was taken to Cardinal laboratories for third party confirmation.
- 04/10/05 E.D. Walton was on site to excavate contaminated soil inside and around excavation #1 and haul to Artesia Aeration. Called Mike Bratcher to inform him that we were going to sample the next day and if he was available to witness. Mike said that he would be around to witness the sampling at 10:00 am.
- 4/11/05 Mike arrived on location at 10:00 am and pointed out some staining on the east and west wall of excavation #1. Bottom Hole was a grab sample from middle of excavation, north wall was a grab sample from the middle of the wall, west wall was a two point sample on the only two visible stains (on rock), south wall was a grab sample from the middle of the wall, east upper wall was a two point sample of two stains (on rock), east lower wall was a grab sample from the middle of the wall. Mike Bratcher went around location with a shovel digging up soil and found two areas that had a TPH odor. Started excavating areas with backhoe that was on location and continued hauling to Artesia Aeration.
- 4/12/05 E.D. Walton was on site with backhoe and dump truck excavating and hauling soil. Started excavating excavation #2 and #3 with backhoe. Called Mike Bratcher to ask if he could meet me on the 13 of April to witness some sampling from all three excavations.
- 4/13/05 Met with Mike with OCD and sampled Excavation #1, #2 and #3. Mike wanted to sample the upper west wall of excavation #1 because he said it had a TPH odor to it. After removing the stains of excavation #1 Mike said that there was no need to sample any other area. On excavation #2 and #3 Mike wanted to sample the main areas of the excavation. All samples taken were composite samples of each area.
- 4/20/05 Went to site to clean out bottom hole of Excavation #3 but there was water in every excavation. Called Tony with Navajo to send a vacuum truck to

suck water out of excavations. The amount of water that was sucked out was 200 plus barrels.

4/25/05

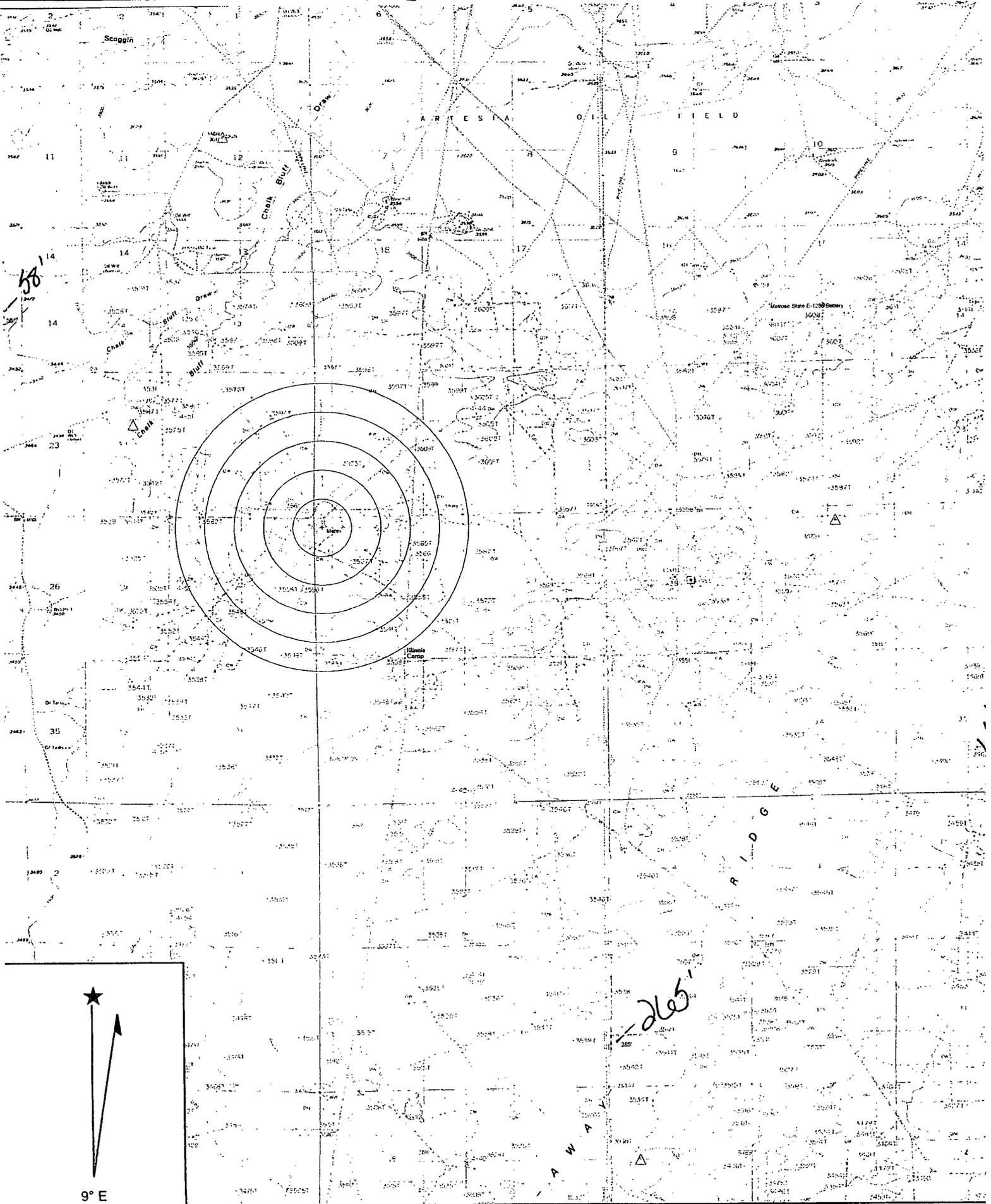
Arrived on site and I & W had a backhoe and dump truck on site to excavate bottom hole of excavation #3 and haul to Artesia Aeration. Called Mike Bratcher and asked if we could start backfilling excavations #2 and #3 since the analysis come back clean. Mike said no because he was coming over with two gentlemen from the state out of Santa Fe to look over the site and that he might have another plan for the site. I (Sergio) talked to Bob Allen about what was said and he said he would contact Navajo and inform them. At 1:00 pm Bob Allen and Mark Whitaker with Safety and Environmental Solutions arrived on site. At 1:30 pm OCD arrived on location with Mike and two other gentlemen out of Santa Fe. Albert Reyes with Navajo arrived shortly after the OCD and the sampling of excavation #3 took place, which was a grab sample from bottom hole. Three trenches were excavated with backhoe where Mike Bratcher was the person who pointed out where to excavate. Samples of the sidewalls and bottom holes were taken from each trench and taken to Cardinal laboratories for third party confirmation. OCD started talking and the two gentlemen from Santa Fe said that they did not see a problem with closing the site. Mike Bratcher was asked what he thought and he did not answer. Everyone finally decided that there was no threat to water and decided to close the site. Moved over to excavation #1 and removed about 24 yards of soil with an odor of TPH and hauled to Artesia Aeration.

4/26/05

Began hauling clean backfill to the site, by landowners request of where to get the soil from. A total of 13 -12 yard loads were taken to the Metex site. Navajo's backhoe arrived and backfilled site.

4/27/05

Continued hauling clean fill to site and backfill. Finished up that evening and left for the day.



Name: ILLINOIS CAMP
 Date: 5/4/2005
 Scale: 1 inch equals 4444 feet

Location: 032° 42' 59.40" N 104° 12' 5.05" W

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I. Company Contacts

Albert Reyes	Navajo Refining	505-748-8940	albert@navajo-refining.com
Bob Allen	SESI	505-397-0510	<u>ballen@sesi-nm.com</u>

II. Background

Safety & Environmental Solutions, Inc. (SESI) was contracted by Navajo Refining Inc. to perform assessment and supervise cleanup services on an area identified as the ERS Metex Artesia Unit. The subject site is an area, which was affected by a crude oil leak from a 3" gathering line. The site is located in Section 30, Township 18S, Range 28E in Eddy County, New Mexico.

III. Contaminant and Size of Area

The suspected contaminate is crude oil from a 3" gathering line. Approximately 410 barrels were released, of which 390 barrels were recovered. The release affected an area approximately 100' X 125' in a "buffalo wallow" with standing water. The suspected contaminant was classified as an exempt oilfield waste. No evidence of other contaminants was observed.

IV. Surface and Ground Water

According to the database provided by the New Mexico State Engineer's Office the closest groundwater of record is in Section 35 of the same range and township. The depth in this well was 65' in 1956.

V. Soils

The soils in the area are predominantly sand and sandy loam.

VI. Work Performed

The cleanup level reached by the application of the "**Guidelines for Remediation of Leaks, Spill and Releases**" *New Mexico Oil Conservation Division* – August 13, 1993 to this site is 100 ppm Total Petroleum Hydrocarbon (TPH).

On November 19, 2004 SESI responded to the leak site and instructed the crew to began to pick up the oil from the water with a skimmer. The oil was transported and released back into production. Containment booms were used to encircle the pond and the oil soaked grass around the perimeter was burned off.

The path, which the leak took from the site of the leak to the pond, was excavated to a depth of approximately 3'. The excavation was backfilled with clean soil supplied by the landowner from off-site. Approximately 6 to 8" of soil was removed from the area immediately adjacent to the pond. Approximately 300 cubic yards of contaminated soil was transported to Artesia Aeration, a NMOCD approved disposal facility, for disposal.

Soil samples were retrieved from the bottom of the excavation and around the pond area. The water from the pond was sampled approximately 10 feet from the shoreline. All samples were properly preserved and sent under chain of custody to Cardinal Laboratories of Hobbs, New Mexico for analysis. The soil samples were analyzed for

TPH (EPA Method 418.1) and BTEX (EPA Method 8260). The water samples were analyzed for major cations and anions. The results of the samples are as follows:

Date	Sample ID	TPH	Benzene	Toluene	Ethyl Benzene	Total Xylenes
1/21/05	Excavation #1	48.8	<0.005	<0.005	<0.005	<0.015
1/21/05	Excavation #2	<10	<0.005	<0.005	<0.005	<0.015
1/21/05	Excavation #3	<10	<0.005	<0.005	<0.005	<0.015
1/21/05	Excavation #4	<10	<0.005	<0.005	<0.005	<0.015
1/31/05	Pond N	68.0	<0.005	<0.005	<0.005	<0.015
1/31/05	Pond NE	<10	<0.005	<0.005	<0.005	<0.015
1/31/05	Pond E	<10	<0.005	<0.005	<0.005	<0.015
1/31/05	Pond SE	<10	<0.005	<0.005	<0.005	<0.015
1/31/05	Pond S	17.5	<0.005	<0.005	<0.005	<0.015
1/31/05	Pond SW	50.6	<0.005	<0.005	<0.005	<0.015
1/31/05	Pond W	152	<0.005	<0.005	<0.005	<0.015
1/31/05	Pond NW	88.6	<0.005	<0.005	<0.005	<0.015

ID	Benzene	Toluene	Ethyl Benzene	Total Xylenes
East Side	<0.002	<0.002	<0.002	<0.016
West Side	<0.002	<0.002	<0.002	<0.016

ID	Na (mg/L)	Ca (mg/L)	Mg (mg/L)	K (mg/L)	Conductivity (mS/cm)	T-Alkalinity (mgCaCO ₃ /L)
East Side	16	68	29	32	413	192
West Side	14	52	20	17	402	200

ID	Cl (mg/L)	SO ₄ (mg/L)	CO ₃ (mg/L)	HCO ₃ (mg/L)	pH (s.u.)	TDS (mg/L)
East Side	40	2.71	110	9.76	8.37	318
West Side	44	1.81	81.6	78.1	8.51	319

On April 11 thru April 14, 2005 three additional areas were excavated at the site. Excavation #1 was located north of the original excavation. The depth of excavation #1 ranged from 1.5' to 12' in the immediate area of where the pipeline was removed. Excavation #2 was located east of the original excavation and was approximately 2' deep. Excavation #3 was located west of the original excavation and was approximately 6' deep. Composite samples were retrieved from each excavation and transported under Chain of Custody to Cardinal Laboratories for analysis. The samples were analyzed for TPH (EPA Method 418.1) and BTEX (EPA Method 8260). The results of the analysis are as follows:

Date	Sample ID	TPH	Benzene	Toluene	Ethyl Benzene	Total Xylenes
4/11/05	EXC. #1 Bottom Hole	<10	<0.005	<0.005	<0.005	<0.015
4/11/05	EXC. #1 North Wall	<10	<0.005	<0.005	<0.005	<0.015
4/11/05	EXC. #1 West Wall	15500				
4/11/05	EXC. #1 South Wall	<10	<0.005	<0.005	<0.005	<0.015
4/11/05	EXC. #1 East Upper Wall	12000				
4/11/05	EXC. #1 East Lower Wall	<10	<0.005	<0.005	<0.005	<0.015
4/14/05	EXC. #1 Upper West	294	<0.005	<0.005	<0.005	<0.015

4/14/05	EXC. #2 North Wall	<10	<0.005	<0.005	<0.005	<0.015
4/14/05	EXC. #2 West Wall	<10	<0.005	<0.005	<0.005	<0.015
4/14/05	EXC. #2 Bottom Hole	<10	<0.005	<0.005	<0.005	<0.015
4/14/05	EXC. #2 East Wall	57.9	<0.005	<0.005	<0.005	<0.015
4/14/05	EXC. #3 North Wall	<10	<0.005	<0.005	<0.005	<0.015
4/14/05	EXC. #3 West Wall	<10	<0.005	<0.005	<0.005	<0.015
4/14/05	EXC. #3 East Wall	22.6	<0.005	<0.005	<0.005	<0.015
4/14/05	EXC. #3 Bottom Hole	748	<0.005	<0.005	<0.005	<0.015

On April 25, 2005 three test trenches were installed on the northeast side of the pond. Composite samples were retrieved from the bottom hole and sidewalls of the test trenches. Excavation #3 was additionally excavated and a composite sample was retrieved from the bottom hole. All samples were transported under Chain of Custody to Cardinal Laboratories for analysis. The samples were analyzed for TPH (EPA Method 418.1). The results of the analysis are as follows:

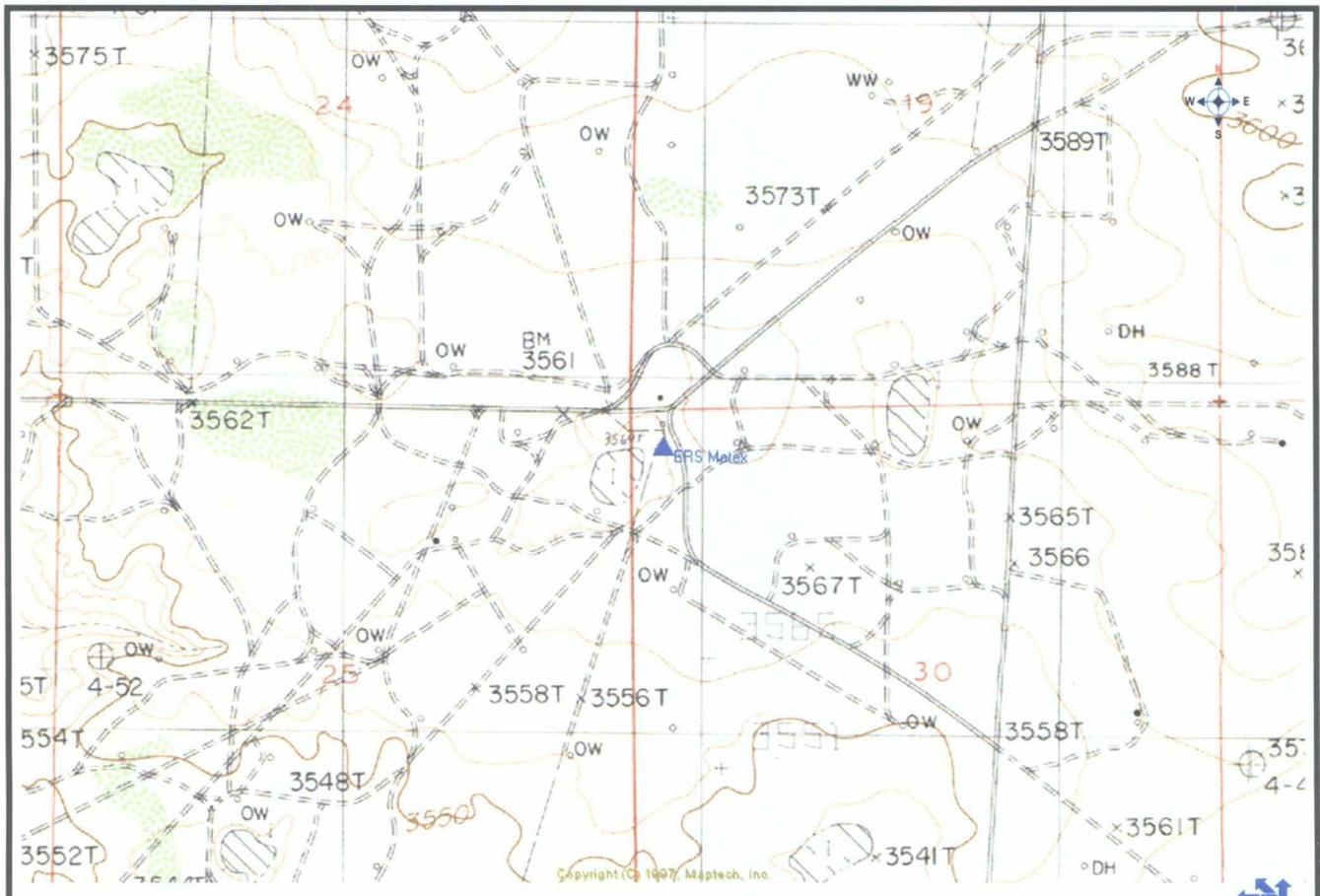
Date	Sample ID	TPH
4/25/05	Trench # 1 Bottom Hole	<10
4/25/05	Trench # 1 Side Walls	<10
4/25/05	Trench # 2 Bottom Hole	23.7
4/25/05	Trench # 2 Side Walls	502
4/25/05	Trench # 3 Bottom Hole	<10
4/25/05	Trench # 3 Side Walls	<10
4/25/05	Excavation # 3 Bottom Hole	<10

Approximately 540 cubic yards of soil from the additional excavations was transported to Artesia Aeration, an NMOCD approved facility, for disposal. The excavations were backfilled with clean soil from the landowner.

VII. Figures & Appendices

- Figure 1 - Vicinity Map
- Figure 2 - Site Plan
- Appendix A - C-141
- Appendix B - Analytical Results
- Appendix C - Site Photos

Figure 1
Vicinity Map



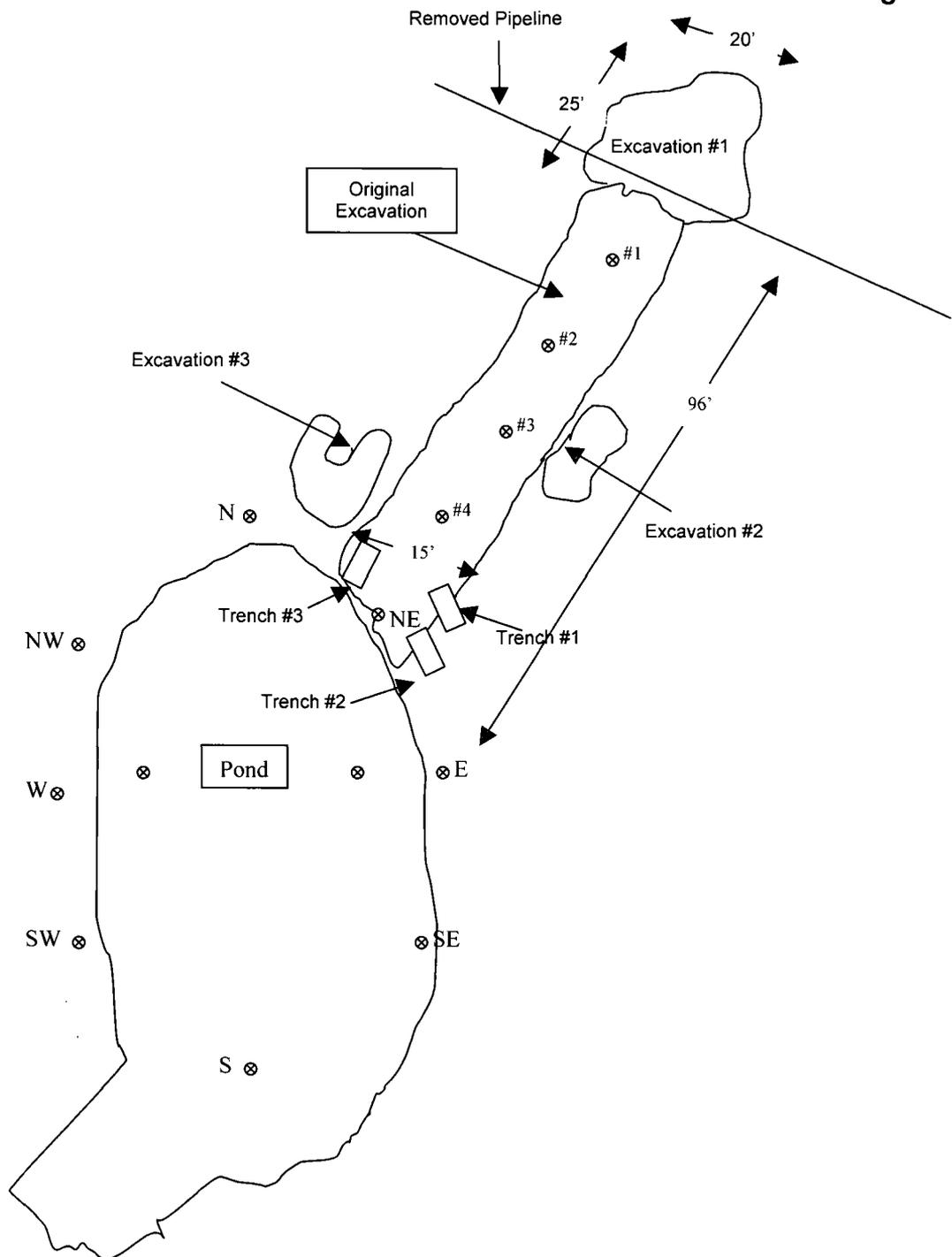
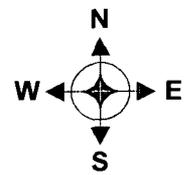
Navajo Petroleum

ERS Metex Artesia Unit
S 30, T18S, R28E
Eddy County, New Mexico

Safety & Environmental Solutions, Inc.



Figure 2
Site Plan



Not to Scale

⊗ Sample Points



**Navajo Refining
Site Plan**

**ERS Metex Artesia Unit
S30, T18S, R28E
Eddy County, New Mexico**

**Safety & Environmental
Solutions, Inc.**

Appendix A
C-141

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

State of New Mexico
Energy Minerals and Natural Resources

Form C-141
Revised March 17, 1999

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

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

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company Navajo Pipeline Company	Contact: Johnny Lackey
Address 311 West Quay, Artesia, NM 88210	Telephone No. 505-748-8942
Facility Name Artesia Crude System	Facility Type Crude Oil Pipeline

Surface Owner	Mineral Owner	Lease No. N/A
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LOCATION OF RELEASE

Unit Letter	Section 30	Township 18S	Range 28E	Feet from the 471	North/South Line	Feet from the 330	East/West Line	County Eddy
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NATURE OF RELEASE

Type of Release Condensate/Crude Oil	Volume of Release ~410 bbls	Volume Recovered 390 bbls
Source of Release 3" ERS LLP Metex Artesia Unit Gathering Pipeline leak	Date and Hour of Occurrence 11/19/2004, ~1:00pm	Date and Hour of Discovery 11/19/1:20pm
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Gerry Guye, OCD	
By Whom? Johnny Lackey, Holly Energy Partners	Date and Hour 11/19/2004, 2:40pm	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

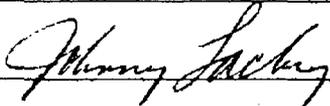
Describe Cause of Problem and Remedial Action Taken.*

A crude oil leak on our 3" gathering line. Vacuum trucks picked the up free liquid. Our spill response trailer was dispatched to the site with sorbent pads and PPE for employees. The land owner was notified. Excavated the contaminated soil at the leak site on the pipeline and will replace with fresh soil.

Describe Area Affected and Cleanup Action Taken.*

An area approximately 100' x 125' in a "buffalo wallow" with standing water. Oil collected on top of water. Vacuumed up the free liquid. Used sorbent pads on affected soil areas. Containment booms were used to encircle the pond and the oil soaked grass around the perimeter was burned off

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	OIL CONSERVATION DIVISION	
Printed Name: Johnny Lackey	Approved by <input type="checkbox"/> District Supervisor:	
Title: Safety/Environmental Supervisor	Approval Date:	Expiration Date:
Date: 12/03/2004 Phone: 505-748-8942	Conditions of Approval:	Attached <input type="checkbox"/>

* Attach Additional Sheets if Necessary

Appendix B
Analytical Results



ARDINAL LABORATORIES

PHONE (325) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR SAFETY & ENVIRONMENTAL SOLUTIONS, INC.

ATTN: BOB ALLEN
703 E. CLINTON, #102
HOBBS, NM 88240
FAX TO: (505) 393-4388

Receiving Date: 01/21/05
Reporting Date: 01/25/05
Project Number: NAV-04-008
Project Name: MRS METER ARTESIA UNIT
Project Location: NOT GIVEN

Sampling Date: NOT GIVEN
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: AH
Analyzed By: BC

LAB NO.	SAMPLE ID	TPH (mg/Kg)	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
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ANALYSIS DATE:		01/24/05	01/24/05	01/24/05	01/24/05	01/24/05
H9495-1	NAVAJO POND #1	48.8	<0.005	<0.005	<0.005	<0.015
H9495-2	NAVAJO POND #2	<10	<0.005	<0.005	<0.005	<0.015
H9495-3	NAVAJO POND #3	<10	<0.005	<0.005	<0.005	<0.015
H9495-4	NAVAJO POND #4	<10	<0.005	<0.005	<0.005	<0.015
Quality Control		235	0.098	0.090	0.100	0.308
True Value QC		240	0.100	0.100	0.100	0.300
% Recovery		98.1	97.8	90.0	99.9	103
Relative Percent Difference		7.2	5.1	0.1	1.2	2.3

METHODS: TRPHC-EPA 600/4-79-020 418.1; BTEX -EPA SW-846 8260

Burgess J. A. Cooke
Burgess J. A. Cooke, Ph.D.

1/25/05
Date

PLEASE NOTE: **Liability and Damages.** Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



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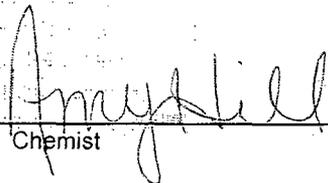
ANALYTICAL RESULTS FOR
 SAFETY & ENVIRONMENTAL SOLUTIONS, INC.
 ATTN: BOB ALLEN
 703 E. CLINTON, #102
 HOBBS, NM 88240
 FAX TO: (505) 393-4388

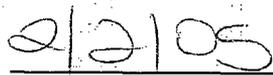
Receiving Date: 01/31/05
 Reporting Date: 02/02/05
 Project Number: NAV-04-008
 Project Name: MEXTEX ARTESIA UNIT
 Project Location: NOT GIVEN

Sampling Date: 01/31/05
 Sample Type: GROUNDWATER
 Sample Condition: COOL & INTACT
 Sample Received By: AH
 Analyzed By: AH

LAB NUMBER	SAMPLE ID	Na (mg/L)	Ca (mg/L)	Mg (mg/L)	K (mg/L)	Conductivity (μ S/cm)	T-Alkalinity (mgCaCO ₃ /L)
ANALYSIS DATE:		02/01/05	02/01/05	02/01/05	02/01/05	02/01/05	02/01/05
H9517-1	EAST SIDE	16	68	29	32	413	192
H9517-2	WEST SIDE	14	52	20	17	402	200
Quality Control		NR	58	54	4.90	1322	NR
True Value QC		NR	50	50	5.00	1413	NR
% Recovery		NR	116	108	98.0	93.6	NR
Relative Percent Difference		NR	3.1	3.8	0.8	0.7	NR
METHODS:		SM3500-Ca-D		3500-Mg E	8049	120.1	310.1

		Cl ⁻ (mg/L)	SO ₄ (mg/L)	CO ₃ (mg/L)	HCO ₃ (mg/L)	pH (s.u.)	TDS (mg/L)
ANALYSIS DATE:		02/01/05	02/01/05	02/01/05	02/01/05	02/01/05	02/02/05
H9517-1	EAST SIDE	40	2.71	110	9.76	8.37	318
H9517-2	WEST SIDE	44	1.81	81.6	78.1	8.51	319
Quality Control		930	50.33	NR	961	7.02	NR
True Value QC		1000	50.00	NR	1000	7.00	NR
% Recovery		93.0	101	NR	96.1	100	NR
Relative Percent Difference		1.0	0.2	NR	1.6	0.1	1.4
METHODS:		SM4500-Cl-B	375.4	310.1	310.1	150.1	160.1


 Chemist


 Date

PLEASE NOTE: **Liability and Damages.** Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



ARDINAL LABORATORIES

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Project Number: NAV-04-008
Project Name: MEXTEX ARTESIA UNIT
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Sampling Date: 01/31/05
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: AH
Analyzed By: BC

LAB NUMBER	SAMPLE ID	TPH (mg/Kg)	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
------------	-----------	----------------	--------------------	--------------------	-----------------------------	-----------------------------

ANALYSIS DATE:		02/01/05	02/01/05	02/01/05	02/01/05	02/01/05
H9517-3	N	68.0	<0.005	<0.005	<0.005	<0.015
H9517-4	NE	<10	<0.005	<0.005	<0.005	<0.015
H9517-5	E	<10	<0.005	<0.005	<0.005	<0.015
H9517-6	SE	<10	<0.005	<0.005	<0.005	<0.015
H9517-7	S	17.5	<0.005	<0.005	<0.005	<0.015
H9517-8	SW	50.6	<0.005	<0.005	<0.005	<0.015
H9517-9	W	152	<0.005	<0.005	<0.005	<0.015
H9517-10	NW	88.6	<0.005	<0.005	<0.005	<0.015
Quality Control		235	0.101	0.093	0.099	0.312
True Value QC		240	0.100	0.100	0.100	0.300
% Recovery		98.1	101	92.7	99.0	104.0
Relative Percent Difference		7.3	6.5	2.0	1.2	0.8

METHODS: TRPHC-EPA 600/4-79-020 418.1; BTEX -EPA SW-846 8260

Burgess J. A. Cooke
Burgess J. A. Cooke, Ph. D.

2/2/05
Date

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**ARDINAL
LABORATORIES**

PHONE (325) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
SAFETY & ENVIRONMENTAL SOLUTIONS, INC.

ATTN: BOB ALLEN
703 E. CLINTON, #102
HOBBS, NM 88240
FAX TO: (505) 393-4388

Receiving Date: 01/31/05
Reporting Date: 02/02/05
Project Number: NAV-04-008
Project Name: MEXTEX ARTESIA UNIT
Project Location: NOT GIVEN

Sampling Date: 01/31/05
Sample Type: GROUNDWATER
Sample Condition: COOL & INTACT
Sample Received By: AH
Analyzed By: BC

LAB NUMBER	SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE		02/01/05	02/01/05	02/01/05	02/01/05
H9517-1	EAST SIDE	<0.002	<0.002	<0.002	<0.016
H9517-2	WEST SIDE	<0.002	<0.002	<0.002	<0.016
Quality Control		0.101	0.093	0.099	0.312
True Value QC		0.100	0.100	0.100	0.300
% Recovery		101	92.7	99.0	104.0
Relative Percent Difference		6.5	2.0	1.2	0.8

METHOD: EPA SW-846 8260

Bursey A. Cooke
Chemist

2/2/05
Date

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(915) 673-7001 Fax (915) 673-7020 (505) 393-2326 Fax (505) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: LES
 Project Manager: BOB ALLEN
 Address: 703 E. CLINTON HIGHWAY
 City: HOBBS State: NM Zip: 88240
 Phone #: _____
 Fax #: _____
 Project #: NW-04-008 Project Owner: NEEDS TO
 Project Name: NEEDS MAY TEX ADDRESS Unit
 Object Location: _____
 For Lab Use Only: _____

BILL TO PO #: _____
 Company: _____
 Attn: _____
 Address: _____
 City: _____
 State: _____ Zip: _____
 Phone #: _____
 Fax #: _____

LAB I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						DATE	TIME	ANALYSIS REQUEST
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:			
H9517-1	First hole		3							11/3/05		CATIONS/ANIONS
-2	Wast hole		1									BTEX
-3	N		1									TPH 418.1
-4	NE		1									
-5	SE		1									
-6	SE		1									
-7	S		1									
-8	SW		1									
-9	W		1									
-10	NW		1									

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Sampler Relinquished: _____ Date: 11/3/05
 Relinquished By: James H. Hays Time: 15
 Received By: _____
 Received By: _____
 Date: _____
 Time: _____

Delivered By: (Circle One) Hand Truck Trailer
 Sampler - UPS - Bus - Other: _____
 Sample Condition: Intact Yes No
 Checked By: HH
 Phone Result: Yes No
 Fax Result: Yes No
 Additional Fax #: _____

* Cardinal cannot accept verbal changes. Please fax written changes to 915-673-7020.



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ANALYTICAL RESULTS FOR
SAFETY & ENVIRONMENTAL SOLUTIONS, INC.
ATTN: BOB ALLEN
703 E. CLINTON, #102
HOBBS, NM 88240
FAX TO: (505) 393-4388

Receiving Date: 04/08/05
Reporting Date: 04/13/05
Project Number: NAV 04-008
Project Name: ERS METEX ARTESIA UNIT
Project Location: ARTESIA, NM

Analysis Date: 04/12/05
Sampling Date: 04/08/05
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

LAB NUMBER SAMPLE ID TPH
(mg/Kg)

H9693-1	BOTTOM HOLE	<10
Quality Control		224
True Value QC		240
% Recovery		93.4
Relative Percent Difference		7.3

METHOD: EPA 418.1

Bruce Cook
Chemist

4/13/05
Date



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PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
 SAFETY & ENVIRONMENTAL SOLUTIONS, INC.
 ATTN: BOB ALLEN
 701 E. CLINTON, #102
 HOBBS, NM 88240
 FAX TO: (505) 393-4388

Receiving Date: 04/12/05
 Reporting Date: 04/14/05
 Project Number: NAV-04-008
 Project Name: METEX
 Project Location: ARTESIA, NM

Sampling Date: 04/11/05
 Sample Type: SOIL
 Sample Condition: COOL & INTACT
 Sample Received By: BC
 Analyzed By: BC

LAB NO.	SAMPLE ID	TPH (mg/Kg)	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE:		04/12/05	04/13/05	04/13/05	04/13/05	04/13/05
H9697-1	BOTTOM HOLE	<10	<0.005	<0.005	<0.005	<0.015
H9697-2	NORTH WALL	<10	<0.005	<0.005	<0.005	<0.015
H9697-3	WEST WALL	15500	-	-	-	-
H9697-4	SOUTH WALL	<10	<0.005	<0.005	<0.005	<0.015
H9697-5	EAST WALL UPPER	12000	-	-	-	-
H9697-6	EAST WALL LOWER	<10	<0.005	<0.005	<0.005	<0.015
Quality Control		227	0.097	0.090	0.093	0.291
True Value QC		240	0.100	0.100	0.100	0.300
% Recovery		94.7	97.3	90.1	92.6	97.1
Relative Percent Difference		11.3	6.5	0.6	2.7	4.4

METHODS: TRPHC-EPA 600/4-79-020 418.1; BTEX -EPA SW-846 8260

Burgess J. A. Cooke
 Burgess J. A. Cooke, Ph. D.

4/14/05
 Date

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(915) 673-7001 Fax (915) 673-7020 (505) 393-2328 Fax (505) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: SAFETY & ENVIRONMENTAL SOLUTIONS		P.O. #:		BILL TO		ANALYSIS REQUEST											
Project Manager:		Company: SAME															
Address: 703 E. CLINTON, #102		Attn:															
City: HOBBS		State: NM		Zip: 88240													
Phone #: (505) 397-0510		Fax #: (505) 393-4388		Address:													
Project #: NM104008		Project Owner:		City:													
Project Name: ME TEX		State:		Zip:													
Project Location: Artesia		Phone #:															
Sampler Name: Sergio		Fax #:															
FOR LAB USE ONLY																	
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						DATE	TIME	TPH					
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :				ACID/BASE:	ICE / COOL	OTHER :		
11697-1	Bohon Lake	G	1	X													
-2	North Wall	G	1	X													
-3	West Wall	G	1	X													
-4	South Wall	G	1	X													
-5	East Wall Upper	G	1	X													
-6	East Wall Lower	G	1	X													

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Terms and Conditions: Interest will be charged on all accounts more than 30 days past due at the rate of 24% per annum from the original date of invoice, and all costs of collection, including attorney's fees.

Sampler Relinquished: *[Signature]* Date: 12 APR 05 Time: *[Blank]*

Relinquished By: *[Signature]* Date: *[Blank]* Time: *[Blank]*

Delivered By: (Circle One) *[Signature]*

Sampler - UPS - Bus - Other: *[Blank]*

Received By: *[Signature]* Date: *[Blank]* Time: *[Blank]*

Received By: (Lab Staff) *[Signature]*

Sample Condition Term, % Yes No

Checked By: *[Signature]* (Initials)

Phone Result: Yes No

Fax Result: Yes No

REMARKS: *[Blank]*

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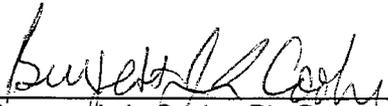
ANALYTICAL RESULTS FOR
SAFETY & ENVIRONMENTAL SOLUTIONS, INC.
ATTN: BOB ALLEN
703 E. CLINTON, #102
HOBBS, NM 88240
FAX TO: (505) 393-4388

Receiving Date: 04/14/05
Reporting Date: 04/21/05
Project Number: NOT GIVEN
Project Name: METEX NAVAJO
Project Location: ARTESIA, NM

Sampling Date: NOT GIVEN
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: AH
Analyzed By: GP/BC

LAB NO.	SAMPLE ID	TPH (mg/Kg)	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE:		04/15/05	04/20/05	04/20/05	04/20/05	04/20/05
H9714-1	EXC. #1 UPPER WEST	294	<0.005	<0.005	<0.005	<0.015
H9714-2	EXC. #2 NORTH WALL	<10	<0.005	<0.005	<0.005	<0.015
H9714-3	EXC. #2 WEST WALL	<10	<0.005	<0.005	<0.005	<0.015
H9714-4	EXC. #2 BOTTOM HOLE	<10	<0.005	<0.005	<0.005	<0.015
H9714-5	EXC. #2 EAST WALL	57.9	<0.005	<0.005	<0.005	<0.015
H9714-6	EXC. #3 NORTH WALL	<10	<0.005	<0.005	<0.005	<0.015
H9714-7	EXC. #3 WEST WALL	<10	<0.005	<0.005	<0.005	<0.015
H9714-8	EXC. #3 EAST WALL	22.6	<0.005	<0.005	<0.005	<0.015
H9714-9	EXC. #3 BOTTOM HOLE	748	<0.005	<0.005	<0.005	<0.015
Quality Control		227	0.091	0.088	0.094	0.298
True Value QC		240	0.100	0.100	0.100	0.300
% Recovery		94.7	90.7	87.6	94.4	99.2
Relative Percent Difference		11.3	3.5	7.2	3.9	5.3

METHODS: TRPHC-EPA 600/4-79-020 418.1; BTEX -EPA SW-846 8260


Burgess W. A. Cooke, Ph. D.

4/21/05
Date

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ANALYTICAL RESULTS FOR
SAFETY & ENVIRONMENTAL SOLUTIONS, INC.
ATTN: BOB ALLEN
703 E. CLINTON, #102
HOBBS, NM 88240
FAX TO: (505) 393-4388

Receiving Date: 04/26/05
Reporting Date: 04/29/05
Project Number: NAV 04 008
Project Name: METEX
Project Location: ARTESIA, NM

Analysis Date: 04/27/05
Sampling Date: 04/25/04
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: NF
Analyzed By: BC

LAB NO.	SAMPLE ID	TPH (mg/Kg)
H9754-1	TRENCH #1 BOTTOM HOLE	<10
H9754-2	TRENCH #1 SIDE WALLS	<10
H9754-3	TRENCH #2 BOTTOM HOLE	23.7
H9754-4	TRENCH #2 SIDE WALLS	502
H9754-5	TRENCH #3 BOTTOM HOLE	<10
H9754-6	TRENCH #3 SIDE WALLS	<10
H9754-7	EXCAVATION #3 BOTTOM HOLE	<10
Quality Control		234
True Value QC		240
% Recovery		97.6
Relative Percent Difference		5.4

METHOD: EPA 418.1

Buyan J. Clark
Chemist

4/29/05
Date

Appendix C
Site Photos



Initial Response



Initial Response



Skim Operation East of Pond



Skim Operation East Side of Pond



Skim Operation, Boom East Side of Pool



Leak Site



Leak Site & Pond Looking Southwest



Pond w/Boom



Skim Operation



Burning Operation



Burning Operation



Burning Operation



Site Facing North



Site Facing Northeast



Site Facing West