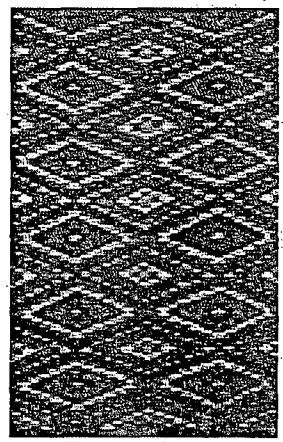
November 17, 2014



Robert L. Bayless, Producer LLC
2700 Farmington Ave. BLDG F, STE 1
Farmington, NM 87401

New Mexico OCD – District 3 (Aztec)
1000 Rio Brazos Road
Aztec, NM 87410

Mr. Cory Smith,

Robert L. Bayless, Producer LLC is requesting no further testing be done and the following pits are allowed to be reclaimed:

WELL	API #
• TL Rhodes B #1E	(30-045-26130)
• Blue Mesa #2	(30-039-25374) CS
• Oxnard #10	(30-045-28523)
• Oxnard #11	(30-045-28293)
• Blanco Com #1E	(30-045-25379)

Composite testing for these wells was completed in August 2008, however the pits were not reclaimed due to pit rule uncertainty at the time. Robert L. Bayless, Producer LLC believes that the composite pit test results are still sufficient as these pits have not been used for operations from the time of testing to today (results attached). Contact me if you have any further questions, or if you would like to discuss this matter.

Brandon Shaw
Robert L. Bayless, Producer LLC
Operations Engineer
O: (505) 326-2659
bshaw@rlbayless.com

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Table I Closure Criteria for Soils Beneath Below-Grade Tanks, Drying Pads Associated with Closed-Loop Systems and Pits where Contents are Removed			
Depth below bottom of pit to groundwater less than 10,000 mg/l TDS	Constituent	Method*	Limit**
≤50 feet	Chloride	EPA 300.0	600 mg/kg
	TPH	EPA SW-846 Method 418.1	100 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg
51 feet-100 feet	Chloride	EPA 300.0	10,000 mg/kg
	TPH	EPA SW-846 Method 418.1	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg
> 100 feet	Chloride	EPA 300.0	20,000 mg/kg
	TPH	EPA SW-846 Method 418.1	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg

*Or other test methods approved by the division

**Numerical limits or natural background level, whichever is greater

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons

Client:	R.L. Bayless	Project #:	92102-0020
Sample ID:	Blue Mesa #2	Date Reported:	08-23-08
Laboratory Number:	46794	Date Sampled:	08-18-08
Chain of Custody No:	5056	Date Received:	08-19-08
Sample Matrix:	Soil	Date Extracted:	08-20-08
Preservative:	Cool	Date Analyzed:	08-21-08
Condition:	Intact	Analysis Requested:	8015 TPH

Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	ND	0.2
Diesel Range (C10 - C28)	ND	0.1
Total Petroleum Hydrocarbons	ND	0.2

RCVD OCT 10 '14
OIL CONS. DIV.
DIST. 3

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: **Blue Mesa #2**

Analyst

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA Method 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons

Quality Assurance Report

Client:	QA/QC	Project #:	N/A
Sample ID:	08-21-08 QA/QC	Date Reported:	08-23-08
Laboratory Number:	46787	Date Sampled:	N/A
Sample Matrix:	Methylene Chloride	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	08-21-08
Condition:	N/A	Analysis Requested:	TPH

	I-Cal Date	I-Cal RF	C-Cal RF	% Difference	Accept. Range
Gasoline Range C5 - C10	05-07-07	1.0141E+003	1.0145E+003	0.04%	0 - 15%
Diesel Range C10 - C28	05-07-07	9.9454E+002	9.9493E+002	0.04%	0 - 15%

Blank Conc. (mg/L - mg/Kg)	Concentration	Detection Limit
Gasoline Range C5 - C10	ND	0.2
Diesel Range C10 - C28	ND	0.1
Total Petroleum Hydrocarbons	ND	0.2

Duplicate Conc. (mg/Kg)	Sample	Duplicate	% Difference	Accept. Range
Gasoline Range C5 - C10	830	825	0.6%	0 - 30%
Diesel Range C10 - C28	117	113	3.2%	0 - 30%

Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept. Range
Gasoline Range C5 - C10	830	250	1,070	99.1%	75 - 125%
Diesel Range C10 - C28	117	250	360	98.1%	75 - 125%

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: **QA/QC for Samples 46787 - 46791, 46794, and 46796 - 46799.**

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8021
AROMATIC VOLATILE ORGANICS

Client:	R.L. Bayless	Project #:	92102-0020
Sample ID:	Blue Mesa #2	Date Reported:	08-23-08
Laboratory Number:	46794	Date Sampled:	08-18-08
Chain of Custody:	5056	Date Received:	08-19-08
Sample Matrix:	Soil	Date Analyzed:	08-21-08
Preservative:	Cool	Date Extracted:	08-20-08
Condition:	Intact	Analysis Requested:	BTEX

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene	**ND**	**0.9**
Toluene	**ND**	**1.0**
Ethylbenzene	**ND**	**1.0**
p,m-Xylene	**ND**	**1.2**
o-Xylene	**ND**	**0.9**
Total BTEX	**ND**	

ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	**99.0 %**
	1,4-difluorobenzene	**99.0 %**
	Bromochlorobenzene	**99.0 %**

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Method 8021B, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: **Blue Mesa #2**

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8021
AROMATIC VOLATILE ORGANICS

Client:	N/A	Project #:	N/A
Sample ID:	08-21-BT QA/QC	Date Reported:	08-23-08
Laboratory Number:	46787	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	08-21-08
Condition:	N/A	Analysis:	BTEX

Calibration and Detection Limits (ug/L)	I-Cal RF:	C-Cal RF:	%Diff. Accept. Range 0 - 15%	Blank Conc	Detect. Limit
Benzene	8.8885E+007	8.9063E+007	0.2%	ND	0.1
Toluene	6.9804E+007	6.9944E+007	0.2%	ND	0.1
Ethylbenzene	5.4515E+007	5.4624E+007	0.2%	ND	0.1
p,m-Xylene	1.1290E+008	1.1313E+008	0.2%	ND	0.1
o-Xylene	5.2304E+007	5.2408E+007	0.2%	ND	0.1

Duplicate Conc. (ug/Kg)	Sample	Duplicate	%Diff.	Accept Range	Detect. Limit
Benzene	3.7	3.6	2.7%	0 - 30%	0.9
Toluene	20.3	17.3	14.8%	0 - 30%	1.0
Ethylbenzene	5.0	4.7	6.0%	0 - 30%	1.0
p,m-Xylene	148	147	0.2%	0 - 30%	1.2
o-Xylene	25.4	22.3	12.2%	0 - 30%	0.9

Spike Conc. (ug/Kg)	Sample	Amount Spiked	Spiked Sample	% Recovery	Accept Range
Benzene	3.7	50.0	53.3	99.3%	39 - 150
Toluene	20.3	50.0	67.3	95.7%	46 - 148
Ethylbenzene	5.0	50.0	54.6	99.3%	32 - 160
p,m-Xylene	148	100	240	97.1%	46 - 148
o-Xylene	25.4	50.0	74.9	99.3%	46 - 148

ND - Parameter not detected at the stated detection limit.

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.
Method 8021B, Aromatic and Halogenated Volatiles by Gas Chromatography Using Photoionization and/or Electrolytic Conductivity Detectors, SW-846, USEPA December 1996.

Comments: **QA/QC for Samples 46787 - 46791, 46794, 46796 - 46799.**

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

Chloride

Client:	R.L. Bayless	Project #:	92102-0020
Sample ID:	Blue Mesa #2	Date Reported:	08-25-08
Lab ID#:	46794	Date Sampled:	08-18-08
Sample Matrix:	Soil	Date Received:	08-19-08
Preservative:	Cool	Date Analyzed:	08-21-08
Condition:	Intact	Chain of Custody:	5056

Parameter	Concentration (mg/Kg)
Total Chloride	**142**

Reference: U.S.E.P.A., 4500B, "Methods for Chemical Analysis of Water and Wastes", 1983.
Standard Methods For The Examination of Water And Waste Water", 18th ed., 1992.

Comments: **Blue Mesa #2.**

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