



BNC Environmental Services, Inc.

August 31, 2004

Mr. Paul Sheeley  
Environmental Engineer  
New Mexico Oil Conservation Division – District 1  
1625 North French Drive  
Hobbs, NM 88240

RE: **ADDENDUM TO SITE CLOSURE REPORT**  
Caprock Exploration, Inc.  
Saunders 28 B, State No. 001  
Section 28, T14S, R33E  
Lea County, New Mexico



Mr. Sheeley:

BNC Environmental Services, Inc. (BNC) is pleased to present the New Mexico Oil Conservation Division (NMOCDD) the following Addendum to the August 12, 2004 Site Closure Report on behalf of Caprock Exploration, Inc. (Caprock), regarding the above referenced site. The site is located west of Lovington, Lea County, New Mexico.

Site activities were performed as proposed in the July 22, 2004 Soil Assessment and Closure Workplan submitted to the NMOCDD by BNC on behalf of Caprock. Soil samples were collected by BNC personnel during a site visit conducted on July 26, 2004 and analyzed for Total Petroleum Hydrocarbons (TPH) and Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX). The NMOCDD was notified in advance of the approved closure activities to witness the sampling event. These samples were submitted to TraceAnalysis, Inc. in Lubbock, Texas. Analyses for chlorides on these samples (collected on July 26, 2004) were requested after a Denial of Closure letter was received on August 13, 2004.

Laboratory results indicated chloride concentrations ranging from 204 to 977 mg/Kg in the borehole samples and 546 mg/Kg in the five-point composite sample (a copy of the certified laboratory report is attached).

As a result of these findings, BNC, on behalf of Caprock Exploration, Inc., respectfully requests a written determination of "no further action" for this site. Please forward all communications to Ms. Gail Dixon, Caprock Exploration, Inc., P. O. Box 7288, Odessa, TX 79760.

Sincerely,  
**BNC Environmental Services, Inc.**

A handwritten signature in black ink, appearing to read "Will Murley for".

Will Murley  
Project Manager

A handwritten signature in black ink, appearing to read "Tom Larson for".

Thomas C. Larson  
Operations Manager

Attachments: TABLE I  
Copy of Certified Laboratory Report

Cc: Mark Dehlinger, consultant for Caprock Exploration, Inc.  
Gail Dixon, Caprock Exploration, Inc.

**Table I**  
**Soil BTEX and TPH Analytical Results**  
**Caprock Exploration, Inc.**  
**Saunders 28 B, State No. 001**

SAMPLE  ID	DATE	DEPTH  (feet)	BENZENE  (mg/Kg)	TOLUENE  (mg/Kg)	ETHYL- BENZENE  (mg/Kg)	XYLENES  (mg/Kg)	TOTAL BTEX  (mg/Kg)	TPH (8015 Modified)			Chloride  (mg/Kg)
								TPH DRO  (mg/Kg)	TPH GRO  (mg/Kg)	TPH (GRO/DRO)  (mg/Kg)	
New Mexico Oil Conservation Division Recommended Remediation Action Levels (Total Ranking Score >10)											
10			---	---	---	50.0	---	---	1,000		
mg/Kg						mg/Kg			mg/Kg		
Saunders Composite	7/26/2004	---	<0.0100	<0.0100	<0.0100	<0.0100	<0.0100	307	<1.00	307	546
Saunders 0-1'	7/26/2004	0-1	<0.0100	<0.0100	<0.0100	<0.0100	<0.0100	247	<1.00	247	204
Saunders 1-2'	7/26/2004	1-2	<0.0100	<0.0100	<0.0100	<0.0100	<0.0100	117	13.6	130.6	977

Report Date: August 25, 2004  
1660

Work Order: 4072807  
Saunders 28B

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Lovington, New Mexico

## Summary Report

Will Murley  
BNC Midland  
2135 South Loop 250 West  
Midland, TX 79703

Report Date: August 25, 2004

Work Order: 4072807

Project Location: Lovington, New Mexico  
Project Name: Saunders 28B  
Project Number: 1660

Sample	Description	Matrix	Date Taken	Time Taken	Date Received
39903	Saunders Composite	soil	2004-07-26	12:05	2004-07-28
39904	Saunders 0-1	soil	2004-07-26	12:12	2004-07-28
39905	Saunders 1-2	soil	2004-07-26	12:20	2004-07-28

### Sample: 39903 - Saunders Composite

Param	Flag	Result	Units	RL
Chloride		546	mg/Kg	1.00

### Sample: 39904 - Saunders 0-1

Param	Flag	Result	Units	RL
Chloride		204	mg/Kg	1.00

### Sample: 39905 - Saunders 1-2

Param	Flag	Result	Units	RL
Chloride		977	mg/Kg	1.00



# TRACE ANALYSIS, INC.

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## Analytical and Quality Control Report

Will Murley  
BNC Midland  
2135 South Loop 250 West  
Midland, TX 79703

Report Date: August 25, 2004

Work Order: 4072807

Project Location: Lovington, New Mexico  
Project Name: Saunders 28B  
Project Number: 1660

Enclosed are the Analytical Report and Quality Control Report for the following sample(s) submitted to TraceAnalysis, Inc.

Sample	Description	Matrix	Date Taken	Time Taken	Date Received
39903	Saunders Composite	soil	2004-07-26	12:05	2004-07-28
39904	Saunders 0-1	soil	2004-07-26	12:12	2004-07-28
39905	Saunders 1-2	soil	2004-07-26	12:20	2004-07-28

These results represent only the samples received in the laboratory. The Quality Control Report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

This report consists of a total of 4 pages and shall not be reproduced except in its entirety, without written approval of TraceAnalysis, Inc.



Dr. Blair Leftwich, Director

## Analytical Report

### Sample: 39903 - Saunders Composite

Analysis:	Chloride (IC)	Analytical Method:	E 300.0	Prep Method:	N/A
QC Batch:	12231	Date Analyzed:	2004-08-24	Analyzed By:	MW
Prep Batch:	10806	Date Prepared:	2004-08-24	Prepared By:	MW

Parameter	Flag	RL Result	Units	Dilution	RL
Chloride		546	mg/Kg	50	1.00

### Sample: 39904 - Saunders 0-1

Analysis:	Chloride (IC)	Analytical Method:	E 300.0	Prep Method:	N/A
QC Batch:	12231	Date Analyzed:	2004-08-24	Analyzed By:	MW
Prep Batch:	10806	Date Prepared:	2004-08-24	Prepared By:	MW

Parameter	Flag	RL Result	Units	Dilution	RL
Chloride		204	mg/Kg	10	1.00

### Sample: 39905 - Saunders 1-2

Analysis:	Chloride (IC)	Analytical Method:	E 300.0	Prep Method:	N/A
QC Batch:	12231	Date Analyzed:	2004-08-24	Analyzed By:	MW
Prep Batch:	10806	Date Prepared:	2004-08-24	Prepared By:	MW

Parameter	Flag	RL Result	Units	Dilution	RL
Chloride		977	mg/Kg	100	1.00

### Matrix Blank (1) QC Batch: 12231

Parameter	Flag	Result	Units	RL
Chloride		6.46	mg/Kg	1

### Laboratory Control Spike (LCS-1) QC Batch: 12231

Param	LCS Result	LCSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	RPD	Rec. Limit	RPD Limit
Chloride	18.0	18.2	mg/Kg	1	12.5	6.46	92	1	90 - 110	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

### Matrix Spike (MS-1) QC Batch: 12231

Report Date: August 25, 2004  
1660

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Param	MS Result	MSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	RPD	Rec. Limit	RPD Limit
Chloride	94500	94500	mg/Kg	5000	12.5	37800	91	0	69.4 - 118	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

**Standard (ICV-1)**    QC Batch: 12231

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
Chloride		mg/Kg	12.5	11.8	94	90 - 110	2004-08-24

**Standard (CCV-1)**    QC Batch: 12231

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
Chloride		mg/Kg	12.5	11.8	94	90 - 110	2004-08-24

[illegible]

Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C.O.C.

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3 samples HS