1R - 426 - 281WORKPLANS Date: 3-16-12

Rice Environmental Consulting & Safety

P.O. Box 5630 Hobbs, NM 88241 Phone 575.393.4411 Fax 575.393.0293

RECEIVED OCD

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CERTIFIED MAIL RETURN RECEIPT NO. 7011 2000 0002 0285 5070

March 16th, 2012

Mr. Edward Hansen

New Mexico Energy, Minerals, & Natural Resources Oil Conservation Division, Environmental Bureau 1220 S. St. Francis Drive Santa Fe, New Mexico 87505

RE: Further Investigation Report and Corrective Action Plan (CAP) for Soils Rice Operating Company – BD SWD System

BD G-23 EOL (1R426-281): UL/G sec. 23 T22S R37E (formerly BD B-23 EOL)

Mr. Hansen:

RICE Operating Company (ROC) has retained Rice Environmental Consulting and Safety (RECS) to address potential environmental concerns at the above-referenced site in the BD Salt Water Disposal (SWD) system. The site was previously referred to as the BD B-23 EOL. However, GIS mapping shows the site to be located within unit letter G. To reflect the geographical location of the site, the name has been changed to the BD G-23 EOL. All correspondences will reference BD G-23 EOL.

ROC is the service provider (agent) for the BD SWD System and has no ownership of any portion of the pipeline, well, or facility. The system is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

Background and Previous Work

The site is located approximately 4 miles southeast of Eunice, New Mexico at UL/G sec. 23 T22S R37E as shown on the Site Location Map (Figure 1). Groundwater at this site is located at a depth of approximately 59 +/- feet.

In 2010, ROC initiated work on the former BD G-23 EOL junction box. The former junction box was located on an active battery pad and contained a boot. The site was delineated using a backhoe to form a 25 ft x 10 ft x 12 ft deep excavation and soil samples were screened at regular intervals for both hydrocarbons and chlorides. From the excavation, the four-wall composite, the bottom composite and the backfill were taken to a commercial laboratory for analysis. Laboratory tests of the four-wall composite

showed a chloride reading of 3,320 mg/kg, and gasoline range organics (GRO) and diesel range organics (DRO) readings of non-detect. The bottom composite showed a chloride laboratory reading of 9,520 mg/kg and GRO and DRO readings of non-detect. The soil was blended on site and a sample taken to a commercial laboratory for analysis. Laboratory analysis of the blended backfill showed a chloride reading of 4,560 mg/kg and GRO and DRO readings of non-detect. The blended backfill was returned to the excavation to 5 ft below ground surface (bgs). At 5-4 ft bgs, a 1 foot clay layer was installed and a clay compaction test was performed on March 1st, 2010. The remaining backfill was exported to a NMOCD approved facility for disposal and the excavation was backfilled with clean, imported soil to ground surface.

The area was contoured to the surrounding landscape, seeded, and an identification plate was placed on the surface of the site to mark its location for future environmental considerations. NMOCD was notified of potential groundwater impact on August 4th, 2010, and a junction box disclosure report was submitted to NMOCD with all the 2010 junction box closures and disclosures.

Initial ICP Investigative Results and Recommendations

As part of the Investigation and Characterization Plan approved by NMOCD on May 19th, 2011, six soil bores (SB-1 through SB-6) were advanced through the former junction box site on May 23rd, 2011 and June 6th, 2011. RECS personnel field tested the soil for chlorides and screened in the field with a photo-ionization detector (PID). Representative samples from the bores were taken to a commercial laboratory for confirmation of chloride and hydrocarbon field numbers. All the soil bores had laboratory chloride values that decreased with depth. SB-1 had chloride results that decreased from 8,200 mg/kg at 15 ft bgs to 160 mg/kg at 55 ft bgs; SB-2 had values of 1,420 mg/kg at 20 ft bgs, 112 mg/kg at 30 ft bgs and 304 mg/kg at 40 ft bgs; SB-3 had values of 5,300 mg/kg at the surface, 1,760 mg/kg at 5 ft bgs and 336 mg/kg at 55 ft bgs; SB-4 has values of 12,800 mg/kg at 15 ft bgs and 4,000 mg/kg at 55 ft bgs; SB-5 had values of 10,200 mg/kg at 20 ft bgs and 544 mg/kg at 50 ft bgs; and SB-6 had values of 2,560 mg/kg at 15 ft bgs and 192 mg/kg at 30 ft bgs. GRO readings were non-detect in all soil bores. DRO readings were also non-detect at all depths in all soil bores except for SB-2 at 30 ft bgs where the DRO reading was 26.9 mg/kg. This sample was analyzed for BTEX and returned results of 0.113 mg/kg for benzene, 0.132 mg/kg for toluene, 0.119 mg/kg for ethyl-benzene and 0.499 mg/kg for xylene.

Based on the initial delineation results, RECS submitted an ICP Report with the following recommendation to NMOCD on July 15th, 2011 which was approved on September 20th, 2011: ROC would delineate groundwater quality surrounding the former junction box through the installation of a near source monitoring well.

On January 31st, 2012, RECS personnel were on site to install a near-source monitor well (MW-1) (Figure 2). Samples were only taken for lithology as the well was being advanced (Appendix B). The well was then sampled on February 20th, 2012 and returned a chloride value of 860 mg/L, a TDS value of 1,970 mg/L and a BTEX value of

non-detect (Appendix C). ROC will continue sampling the monitor well quarterly to determine groundwater quality at the site. Additional monitoring wells may be required to fully delineate groundwater quality at this site.

Corrective Action Plan for Soils

ROC proposes to excavate the site to dimensions of 36 ft x 29 ft and properly seat a 20mil, reinforced poly liner at approximately 4 ft bgs. The liner will cover the existing clay layer at 5-4 ft bgs measuring 10 ft x 25 ft. The soils placed above the liner will have a laboratory chloride reading no greater than 500 mg/kg and a field PID measurement below 100 ppm. Excavated soil will be evaluated for use as backfill and any soils requiring disposal will be properly disposed of at a NMOCD approved facility. The excavation will be capped with caliche since the site is located on an active battery lease pad (Appendix A) and seeding of the site will not be necessary.

After the corrective actions to the soils are completed and the monitor well has been sampled sufficiently to determine groundwater quality, ROC will submit a report detailing the soils remediation and a path forward to address groundwater quality.

RECS appreciates the opportunity to work with you on this project. Please call Hack Conder at (575) 393-9174 or me if you have any questions or wish to discuss the site.

Sincerely,

AC.W-

Lara Weinheimer Project Scientist RECS (575) 441-0431

Attachments:

Figure 1 – Site Map Figure 2 – Soil Bore and MW Installation and Proposed Liner Appendix A – Site Photo Appendix B – Soil Bore and Monitor Well Installation Logs Appendix C – Monitor Well Sampling Lab



Figures





Soil Bore and MW Installation and Proposed Liner



Appendix A Site Photo

BD G-23 EOL (1R426-281) UL/G, Sec 23, T-22S, R-37E



BD G-23 EOL in relation to the surrounding facility, facing northwest 1/6/2012

Appendix B Soil Bore and Monitor Well Installation Logs

_ogger: Driller:	ogger: Jordan Woodfin Priller: Harrison & Cooper, Inc.		Jordan Woodfin Harrison & Cooper, Inc.		58.5 00-1 58.3 00-1 58.5 00-100-158.5 00-100-100-158.5 00-100-100-100-100-100-100-100-100-100-	RECS			
Drilling Method: Air rotary Start Date: 5/23/2011 End Date: 5/23/2011 Comments: Located 1 ft northwest of All samples wei DRAFTED BY: TD = 55 ft		y 1 1 thwest o ples we FTED BY:	st of the former junction box site. were from cuttings. SY: L. Weinheimer GW = 59 ft		Project Name:Well ID:BD G-23 EOLSB-1Project Consultant: RECSLocation:UL/G sec. 23 T22S R37ELat:32°22'51.532"NCounty: LLong:103°7'47.412"WState: NM				
Depth (feet)	chlori field te	de ests	LAB	PID	Description		Lithology	Well	Construction
15 ft	668	7	CI- 8200 GRO <10 DRO	23.7	Tan very fine silt with some sand and caliche				
20 ft	283	9	<10	9.3					
25 ft	218	1		3.6					
30 ft	1749	9		1.7	Red to tan very fine silty sand				
35 ft	2294	4		0					seal
40 ft	105	5		0					
45 ft	752	2		0					
					Tan to white very fine silty sand				
50 ft	570)		0					
55 ft	289)	CI- 160 GRO	4.4	Red very fine sand				
			<10 DRO <10						

Logger: Jordan Woodfin Driller: Harrison & Cooper, Inc. Drilling Method: Air rotary Start Date: 5/23/2011 End Date: 5/23/2011 Comments: Located 20 ft north-nor box site. DRAFTED BY: TD = 40 ft		Jordan Woodfin Harrison & Cooper, Inc. Air rotary 5/23/2011 5/23/2011 Located 20 ft north-north-west of the former junction box site. All samples were from cuttings. DRAFTED BY: L. Weinheimer		RECS			
				Project Name: Well ID: BD G-23 EOL SB-2 Project Consultant: RECS Location: UL/B sec. 23 T22S R37E Lat: 32°22'51.719"N County Long: 103°7'47.336"W State: N			
chloride ield tests	LAB	PID	Description	Lithology	Well Construction		
			White very fine silty sand with caliche				
201	-	0					
201		0					
323		0	Tan very fine silty sand				
918		0					
1132	CI- 1420	0.7			bentonite		
-	<10 DRO <10				seal		
424		12	Red fine silty sand				
Sec.							
193	112 GRO	213					
T 0.132	<10 DRO		Top to red you fine the good				
X 0.499	26.9		I an to red very fine slity sand				
168		24.9	1				
100	Cl-	1.4	Tan well consolidated fine sand with				
103	GRO <10 DRO		calicite				
	Ja Harris Harris S: Located D = 40 chloride ield tests 201 323 918 1132 424 193 T 0.132 X 0.499 168	Jordan Work Harrison & Coord Air rotar 5/23/201 5/23/201 5/23/201 5/23/201 S: Located 20 ft m box site. All DFA TD = 40 ft Chloride ield tests 201 201 201 323 323 918 918 918 918 918 918 1132 Cl- 10 X 0.424 10 X 0.429 26.9 168	Jordan WoodfinHarrison & Cooper, Inc.Air rotary $5/23/2011$ $5/23/2011$ $5/23/2011$ S: Located 20 ft north-no box site. All sample DRAFTED BYTD = 40 ftChloride ield testsLABPID2010201020102010323032309180918091809180424121132Cl- 14200	Jordan Woodfin Harrison & Cooper, Inc. Air rotary 5/23/2011Jordan Woodfin Harrison & Cooper, Inc. Air rotary 5/23/2011Site Cocated 20 ft north-north-west of the former junction box site. All samples were from cuttings. DRAFTED BY: L. Weinheimer TD = 40 ftGW = 59 ftChloride leid testsLABPIDDescriptionOBESCRIPTIONWhite very fine silty sand with caliche2010	Jordan WoodlinHarrison & Cooper, Inc.Air rotary5/23/2011 <td< td=""></td<>		

					en.9			NVIRON-	
Logger:		Jordan Woodfin		dfin			R	ECS	
Driller:	Ha	arrison &	Coop	ber, Inc.	58-5 000		ONSULT	ING & SAFETY,	
Drilling I	Method:	Air	rotary	/	25 ⁿ Lease Road	Pro	oject Name:		Well ID:
Start Dat	te:	5/23	3/201	1	10 m Nor-HOC Palents	1	BD G-23 E0	OL	SB-3
End Date	e:	5/23	3/201	1	0 DRG	Pro	oject Consulta	nt: REC	5
Comme	ents: Loca b	ated 10 ox site.	ft ea	ast of t	he former junction es were from cuttings.	Lo	cation: UL/G	sec. 23 T	22S R37E
		I	DRAF	TED BY	/: L. Weinheimer	Lat	t: 32°22'51.535	5"N	County: Lea
	TD =	55 ft			GW = 59 ft		Long: 103 °7'47.271"W State: NM		
Depth (feet)	field tes	e ts	AB	PID	Description		Lithology	Well	Construction
			_						
		C) -						
SS	3459	53 GF	800 RO	1.3					19
		<	10						
-		<	10						
5 ft	1625	17	760	0					
		G	RO 10		Tan very fine silty sand with caliche				
		DF	RO 10						
10.6	1152		10	0					
10 11	1155		_	0					
			_						
15.4	010			0		R			
1511	013		_	0					
-			_						
		_	-						
20 ft	336		_	0					
		_							
		_	_						
25 ft	305	_		0					bentonite
					T				seal
	-				I an to red very fine silty sand				
30 ft	315	_		0					
3									
35 ft	339			0					12.19%

Depth (feet)	chloride field tests	LAB	PID	Description	Lithology	Well Construction
40 ft	457		0			
45 ft	427		0			
50 ft	437		0	Red very fine sand		
55 ft	352	CI- 336 GBO	0			
		<10 DRO <10				

Logger		lordan Wo	odfin	\$8-2 ©	RICE	ENVIRONMENTAL		
		Jordan WO	ouiin	Torr. ROC 2 in stead.	F	RECS		
Driller:	Ha	rrison & Coo	se-s of se-s		"ONBULTING & SAFETY, LE			
Drilling I	Method:	Air rotar	ry	25 the ase Road	Project Name:	Well ID:		
Start Dat	te:	6/6/201	1	10 m Non ROC Patrice	BD G-23 E0	OL SB-4		
End Date	e:	6/6/201	1	o formor jupation	Project Consulta	Int: RECS		
Comme	bo	ox site. Al	l sample	es were from cuttings.	Location: 0L/G	Sec. 23 1223 h37E		
	TD -	DRA	FTED BY	: L. Weinheimer	Lat: 32°22'51.535	5"N County: Lea		
Denth	chlorid			GW = 59 It	Long. 103 7 47.4			
(feet)	field tes	ts LAB	PID	Description	Lithology	Well Construction		
				Brown very fine sand with caliche				
SS	168		2.7					
1								
5 ft	450		3.1					
				Tan very fine silty sand				
	1							
10 ft	3574		4.4					
15 ft	8488	CI- 12,800	1.1					
10 11	0.00	GRO						
		DRO		Brown medium sand				
20.4	0050	<10	1.0					
20 11	2850		1.0					
25 ft	5998		1.0	Tan fine sand				
2011	0000		1.0	ran mo sand		bentonite		
						seal		
30 ft	2812		1.0					
		2						
35 ft	4232	1	1.1					

Depth (feet)	chloride field tests	LAB	PID	Description	Lithology	Well Construction
40 ft	3429		1.1			
45 ft	2455		1	Tan very fine sand with caliche		
50 ft	1268		0.2			
55 ft	2613	CI- 4000 GRO <10 DRO	0			

No.001 a see
SB-3 CONSULTING & SAFETY, LLC
Project Name: Well ID:
BD G-23 EOL SB-5
Project Consultant: RECS
unction Location: UL/G sec. 23 T22S R37E
Lat: 32°22'51.479"N County: Le
e ft Long: 103 °7'47.583"W State: NM
ion Lithology Well Construction
ne sand
dium sand
silty sand
with caliche
bentonite
seal
with caliche
th large coliche
in arge calicite

Depth (feet)	chloride field tests	LAB	PID	Description	Lithology	Well Construction
40 ft	625		0.8			
				Light brown medium sand with caliche		
45 ft	368		0.1			
50 ft	210	CI- 544	0.1	Tan very fine sand		
		GRO <10 DRO <10				

Logger:	Je	ordan Wo	odfin	58-2 (8) Non-1952 J. m. Martin.	RICE	ENVIRONMENTAL		
Driller:	Harris	on & Coo	per, Inc.	38 00-1 S8-3	CONSULTING & SAFETY. LLC			
Drilling I	Drilling Method: Air rotary		у	SB-5 @ There is a set of the set	Project Name: Well ID:			
Start Da	te:	6/6/201	1	10 PT Non-HC-2 Petromo	BD G-23 E	OL	SB-6	
End Date	e:	6/6/201	1	the former investige	Project Consulta	ant: RECS		
Comme	box	site. Al	sample	es were from cuttings.	Location: UL/G	sec. 23 12	20 R3/E	
	TD - 5	DRA	FTED BY	: L. Weinheimer	Lat: 32°22'51.34	2"N	County: Lea	
Denth	chloride	1		GW = 59 IL	Long: 103 7 47.3	592 VV	State. NW	
(feet)	field tests	LAB	PID	Description	Lithology	Well C	onstruction	
				Brown very fine sand with calcihe				
SS	167		0					
				Brown very fine sand				
5 ft	295		0				24	
10 ft	1800		0	Brown medium sand with caliche fragments				
15 ft	1919	CI- 2560 GRO	0				bentonite seal	
		<10 DRO <10						
20 ft	446		0	Tan very fine silty sand				
25 ft	252		0					
30 ft	205	Cl- 192	0	Light red very fine silty sand				
		GRO	-				1.00	
		DRO					Ser al	
		<10					U	

Logger:Kyle NormanDriller:Harrison & Cooper, Inc.Drilling Method:Mud rotaryStart Date:1/31/2012End Date:1/31/2012		ian	Inc.		RECS					
		per, Inc. ry 2 2			Project Name: Well ID: BD G-23 EOL MW-1 Project Consultant: RECS					
Comme	ents: Loca w TD =	ated ated ated ated ated ated ated ated	32 ft so ot sam DRAF ft	outh of pled as TED BY	the site marking plate. The well it was being installed. : L. Weinheimer GW = 59 ft		Location: UL/G sec. 23 T22S R37E Lat: 32°22'51.206"N Long: 103°7'47.346"W State: NM			
Depth (feet)	Chlorid field tes	de sts	LAB	PID	Description		Lithology	Well	Construction	
SS					RED SAND					
5 ft					TAN SAND WITH SOME CALICHE					
10 ft					RED SAND WITH SOME CALICHE		******			
15 ft										
20 ft								VC	hentonito	
25 ft					TAN SAND WITH SOME CALICHE			4 in P	seal	
30 ft										
35 ft										
40 ft		_								
45 ft										
50 ft										
55 ft										

Depth (feet)	Chloride field tests	LAB	PID	Description	Lithology	Well Construction
60 ft						
65 ft				RED SANDY CLAY		
70 ft						
75 ft						
80 ft						sand pack
85 ft						
90 ft				YELLOWISH SANDY CLAY		
95 ft						
100 ft						
105 ft						

Appendix C Monitor Well Sampling Lab



March 01, 2012

Hack Conder Rice Operating Company 112 W. Taylor Hobbs, NM 88240

RE: BD G-23 EOL

Enclosed are the results of analyses for samples received by the laboratory on 02/23/12 12:55.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab accredited certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celeg D. Keine

Celey D. Keene Lab Director/Quality Manager



Analytical Results For:

Rice Operating Company Hack Conder 112 W. Taylor Hobbs NM, 88240 Fax To: (575) 397-1471

Received:	02/23/2012	Sampling Date:	02/20/2012
Reported:	03/01/2012	Sampling Type:	Water
Project Name:	BD G-23 EOL	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Celey D. Keene
Project Location:	T22S R37E SEC23 G ~ LEA COUNTY, NM		

Sample ID: MONITOR WELL #1 (H200477-01)

BTEX 8021B	mg/	L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.001	0.001	02/27/2012	ND	0.050	101	0.0500	6.76	
Toluene*	<0.001	0.001	02/27/2012	ND	0.052	104	0.0500	6.98	
Ethylbenzene*	<0.001	0.001	02/27/2012	ND	0.053	106	0.0500	6.60	
Total Xylenes*	<0.003	0.003	02/27/2012	ND	0.163	108	0.150	7.07	
Surrogate: 4-Bromofluorobenzene (PIL	105 %	% 70.7-11	8						
Chloride, SM4500CI-B	mg/	L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride*	860	4.00	02/28/2012 ND		100	100	100	3.92	
Sulfate 375.4	mg/L		Analyze	d By: HM				-	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Sulfate*	90.5	10.0	02/28/2012	ND	18.5	92.5	20.0	2.74	
TDS 160.1	mg/	L	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
TDS*	1970	5.00	02/24/2012	ND	239	99.6	240	2.59	

Cardinal Laboratories

*=Accredited Analyte

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Celeg D. Kune

Celey D. Keene, Lab Director/Quality Manager



Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500CI-B does not require samples be received at or below 6°C
	Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Kune

Celey D. Keene, Lab Director/Quality Manager

Page 1 of 1 Candimal Tahowatowion The CHAIN-OF-CUSTODY AND ANALYSIS REQUEST	Calulial riauulatul 10% Ilt. LAB order 10#	BILL TO Company: PO# ANAL YSIS REQUEST RICE Operating Company (Circle of Snecify Method No.)	Address: (Street, City, Zip) (Street, City, Zip) (Street, City, Zip) (Street > 122 W Tavior Street > 122 W Tavior Street > 100 Street >	ico 68240 (575) 393-9174 (575) 397-1471	Fax# (575) 397-1471	23 EOL	County New Mexico Sampler Signature: Rozapre Johnson (575)631-9310 85 95 95 95 95 95 95 95 95 95 95 95 95 95	MATRIX PRESERVATIVE SAMPLING 03, HC		 # CONTA # CONTA MVATER Solit MVATER Solit MOUE MARE 802 M	G 3 X 7 7 2 1 2 20 15:20 X 7 X 7				Time: Received by: Date: Time: Phone Results I Yes: No.	Eax Results Yes No Additional Fax Number:	Time: Repeived By //Laboratory Staft) Date: Time: REMARKS:	Sample Condition Cool Intest CHECKED BY: Yes Ves Ves (Initials) CAV Interne@valornet.com	Julei. worthworth
Amartand - Hobbs, New.	el (575) 333-2326 C. C. C. E. M. I. I. C. M. E. M. I. I. C. M. E. M. I. I. C. M. E.	r Name: ∃ Operating Company	lanager: « Conder	(Street, City, Zip) Tavlor Street ~ Hobbs. New Mexico 68240	Fax#) 393-9174 (575	Project Name: BD G-23 EOL	ocation. S R37E Sec23 G ~ Lea County New Mexic		C)owb. Elerd Code		Of Monitor Well #1				ishiert by Date: Time: Rece	e Johnson (2-28-2016 2015	iished'tóy: Date: Time: Repr	ed By: (Circle One) Samp Lef 11PS _ Rue _ Other	

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Page 4 of 4