1R - 426 - 04

REPORTS

DATE

6-27-13

Rice Environmental Consulting & Safety

P.O. Box 2948, Hobbs, NM 88241 Phone 575.393.2967

CERTIFIED MAIL RETURN RECEIPT NO. 7008 1140 0001 3072 4994 RECEIVED OCD

2013 JUL - 1 P 2: 18

June 27th, 2013

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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: CAP Report and Termination Request Rice Operating Company – BD SWD System BD M-26-1 (1R426-04): UL/M sec. 26 T21S R37E

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. 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.

The site is located approximately 1 mile northeast of Eunice, New Mexico at UL/M sec. 26 T21S R37E as shown on the Site Location Map (Figure 1). Groundwater sampling at the site indicated that groundwater is located at 46 ft bgs.

Background and Previous Work

In 2003, ROC initiated work on the former BD M-26-1 junction box. The site was delineated using a backhoe to form a 30 ft x 30 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 remediated backfill were taken to a commercial laboratory for analysis. Laboratory tests of the four-wall composite showed a chloride reading of 1,900 mg/kg, negligible gasoline range organics (GRO) and diesel range organics (DRO), and negligible BTEX. The bottom composite showed a chloride laboratory reading of 851 mg/kg, a GRO reading of 114 mg/kg, and a DRO reading of 867 mg/kg. BTEX for the bottom composite showed negligible benzene and toluene, an ethyl benzene reading of 0.334 mg/kg, and a total xylenes reading of 0.674 mg/kg. A 20-mil poly liner was placed at the bottom of the excavation, and the excavated soil was blended on site and backfilled over the liner. Laboratory analysis of the remediated backfill showed a chloride reading of 248 mg/kg, a GRO reading of 26 mg/kg, and a DRO reading of 324 mg/kg. The BTEX reading for the backfill showed

negligible benzene, toluene, and ethyl benzene. Total xylenes showed a reading of 0.070 mg/kg.

The area was contoured to the surrounding landscape and seeded. NMOCD was notified of potential groundwater impact on March 17th, 2003, and a junction box disclosure report was submitted to NMOCD with all the 2003 junction box closures and disclosures.

As part of the Investigation and Characterization Plan (ICP) approved by NMOCD on May 19th, 2011, seven soil bores (SB-1 through SB-7) were advanced through the former junction box site on May 23rd, May 24th, and June 6th, 2011. RECS personnel field tested the soil for chlorides and screened in the field with a photo-ionization detector (PID) for hydrocarbons. Representative samples from the bores were taken to a commercial laboratory for confirmation of chloride and hydrocarbon field numbers. SB-1, SB-2 and SB-5 had low laboratory chloride readings which tapered off (below 250 mg/kg) prior to reaching the capillary fringe. SB-3, SB-4, SB-6 and SB-7 had laboratory chloride readings which indicated that chlorides may have affected the groundwater beneath the site. GRO readings in all seven bores were non-detect and DRO readings were low. On October 25th, 2011, a near-source monitor well was installed 18 ft southeast of the former junction box site to determine if groundwater beneath the site has been affected by residual chlorides. The monitor well was not sampled as it was installed.

On November 17th, 2011, a Report of Further Investigation was submitted to NMOCD, and was approved on November 22nd, 2011. In the report, RECS recommended that the monitor well be sampled quarterly to evaluate groundwater for possible chloride impacts from the site. If groundwater showed impact from residual chlorides, a groundwater remedy would be developed to address these concerns. If the monitor well indicated no impact to groundwater from the site, ROC would submit a Corrective Action Plan that would address the vadose zone only.

Two surface samples were taken 10 feet outside SB-6 and SB-7 on May 4th, 2012. The surface sample 10 feet east of SB-6 returned laboratory results of non-detect for chlorides, GRO and DRO. The surface sample 10 ft west of SB-7 showed a chloride laboratory reading of 48 mg/kg and GRO and DRO readings of non-detect.

A Corrective Action Plan (CAP) was submitted to NMOCD on May 18th, 2012, which was approved on June 27th, 2012. In the CAP, ROC proposed to excavate the site to the dimensions of 49 ft x 67 ft with the southwest corner angled to remain a safe distance from nearby pipelines and properly seat a 20-mil reinforced poly liner at approximately 5 ft bgs. The liner would provide a barrier that will inhibit the downward migration of chlorides to groundwater. The liner would cover the existing 20-mil poly liner measuring 30 ft x 30 ft installed at 12 ft bgs. The soils placed above the liner would have a laboratory chloride reading no greater than 500 mg/kg and a field PID reading below 100 ppm. Excavated soil would be evaluated for use as backfill and any soils requiring disposal will be properly disposed of at a NMOCD approved facility. Upon completion of backfilling, the site would be seeded with a native vegetative mix and soil amendments will be added as necessary. Vegetation above the liner would also provide a natural

infiltration barrier for the site since plants capture water through their roots thereby reducing the volume of water moving through the vadose zone to groundwater.

ROC proposed to plug and abandon the near-source monitor well with a 1-3% bentonite/concrete slurry and a three foot concrete cap. The monitor well had shown chloride readings below WQCC standards since its installation. It is evident from this data that the residual chlorides in the vadose zone have not impacted groundwater beneath the site.

On October 17th, 2012, RECS personnel were on site to supervise the plugging and abandonment of MW-1. The well was plugged with a 1-3% bentonite/concrete slurry and a three foot concrete cap. On November 20th, 2012, ROC submitted a Plug and Abandon Report of MW-1.

A CAP Addendum was submitted to NMOCD on May 13th, 2013 and approved on the same day. The Addendum changed the dimensions of the liner to accommodate an electrical pole anchor (Figure 2).

CAP Report on the Vadose Zone Remediation

RECS personnel were on site beginning on May 8th, 2013, to begin excavating for liner installation. The site was excavated as shown on Figure 2 to a depth of 5.5 ft. A total of 372 yards of excavated soil was disposed of at a NMOCD approved facility. The remaining excavated soil was blended on site and an 8 point composite sample was taken and field tested for hydrocarbons returning a result of 9 ppm. The sample was then taken to a commercial laboratory for analysis and returned a chloride result of 176 mg/kg. A total of 312 yards of blow sand was imported to the site and an 8 point composite sample was then taken to a commercial laboratory, which returned a chloride result of non-detect.

The bottom of the excavation was padded with 6 inches of imported blow sand and a 20mil reinforced poly liner was installed and properly seated into the excavation. The top of the liner was also padded with blow sand. The remainder of the excavation was backfilled with the blow sand and blended excavated soil. The surface of the excavation was contoured to the surrounding location.

A total of 36 yards of base coarse was imported to the site to repair the lease road. A sample of the base coarse was field tested for hydrocarbons and returned a result of 0 ppm. The sample was then taken to a commercial laboratory for analysis and returned a chloride result of 80 mg/kg.

Silt net fencing was placed around the excavation to prevent erosion and maintain seed integrity. Soil amendments were added to the soil and the site was seeded with a blend of native vegetation.

Documentation of these activities can be found in Appendix A.

Given that ROC has fulfilled the CAP requirements by installing the 20-mil poly liner as shown in Figure 2, ROC, respectfully requests 'remediation termination' or similar closure status of the site.

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.

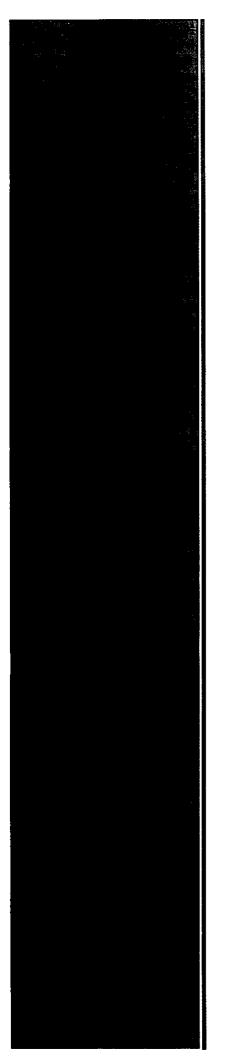
Sincerely,

JC.W.

Lara Weinheimer Project Scientist RECS (575) 441-0431

Attachments:

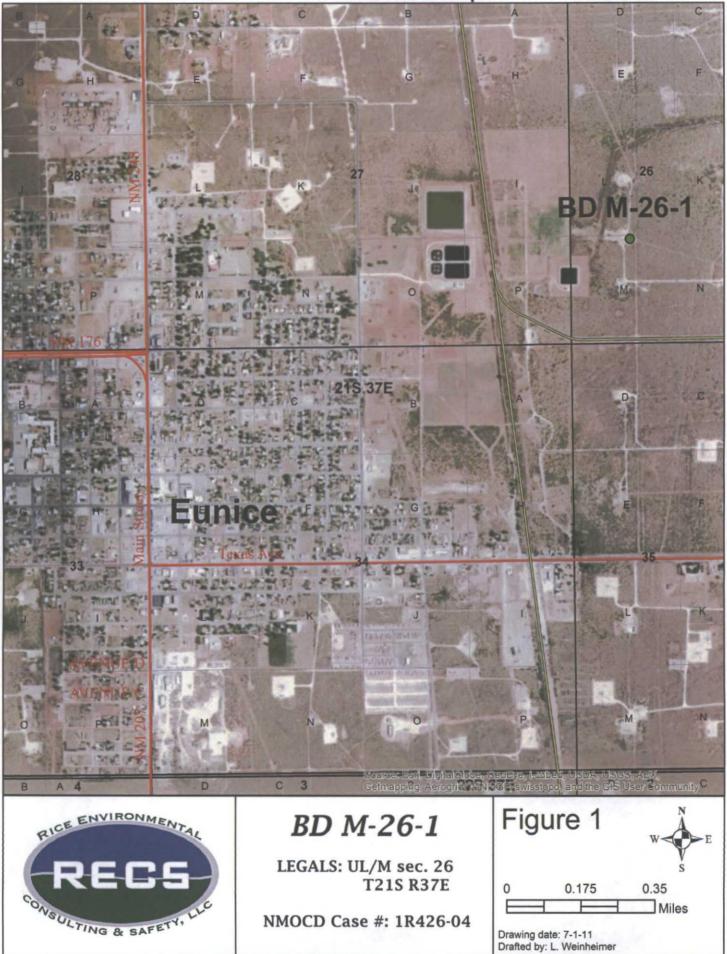
Figure 1 – Site Location Map Figure 2 – NMOCD Approved Liner Appendix A – Liner Installation Documentation



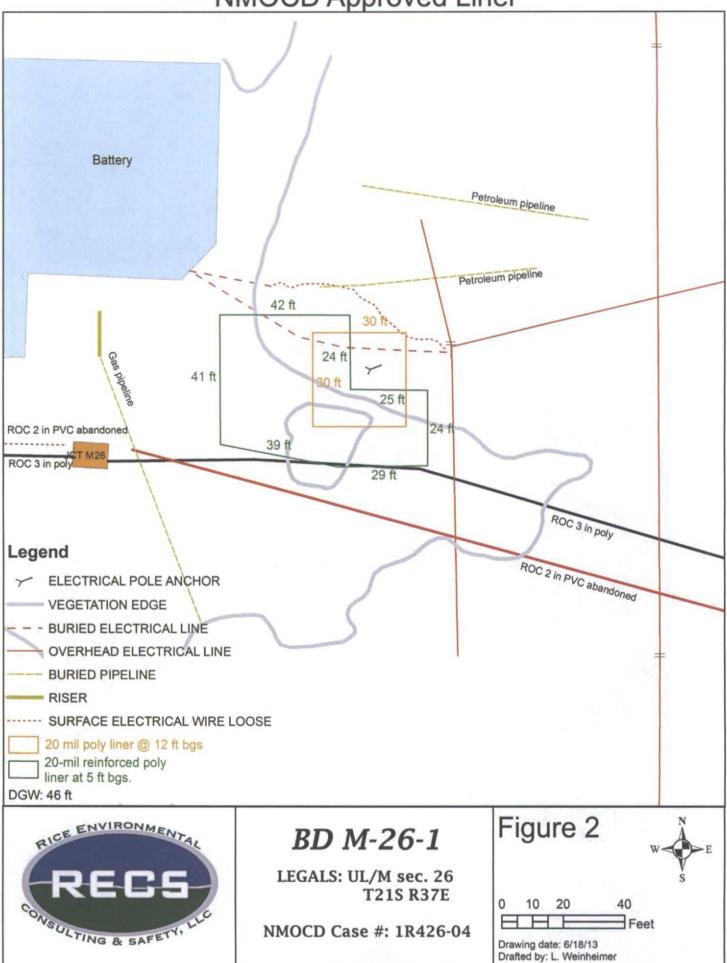
Figures

RICE Environmental Consulting and Safety (RECS) P.O. Box 2948, Hobbs, NM 88241 Phone 575.393.2967

Site Location Map



NMOCD Approved Liner



Appendix A Liner Installation Documentation

RICE Environmental Consulting and Safety (RECS) P.O. Box 2948 Hobbs, NM 88241 Phone 575.393.2967

RICE ENVIRONMENTAL CONSULTING & SAFETY

122 West Taylor Hobbs, NM 88240 PHONE: (505) 393-9174 FAX: (505) 397-1471 PID METER CALIBRATION & FIELD REPORT FORM



LOT NO: HAL-248-100-1

MODEL: PGM 7300 MODEL: PGM 7300 MODEL: PGM 7320 MODEL: PGM 7320 SERIAL NO: 590-000508 SERIAL NO: 590-000504 'SERIAL NO: 592-903318 'SERIAL NO: 590-000183

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

EXPIRATION DATE: 7/1/2015:

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Liverify that I have calibrated the above instrument in accordance to the manufacture operation manual-

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5/16/2013 DÁTE:



May 22, 2013

Bruce Baker Rice Operating Company 112 W. Taylor

Hobbs, NM 88240

RE: BD M-26-1

Enclosed are the results of analyses for samples received by the laboratory on 05/17/13 8:50.

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.tceg.texas.gov/field/qa/lab accredited analytes and matrices visit the TCEQ website at www.tceg.texas.gov/field/qa/lab accredited analytes and matrices visit the TCEQ website at www.tceg.texas.gov/field/qa/lab accredited analytes and matrices visit the TCEQ website at www.tceg.texas.gov/field/qa/lab accredited analytes and matrices visit the TCEQ website at www.tceg.texas.gov/field/qa/lab accredited analytes and matrices visit the TCEQ website at www.tceg.texas.gov/field/qa/lab accredited analytes and matrices visit the TCEQ website at www.tceg.texas.gov/field/qa/lab accredited analytes and matrices visit the TCEQ website at www.tceg.texas.gov/field/qa/lab accredited analytes and water and solid and solid accredited analytes and water and solid accredited analytes and water and solid accredited analytes and water and solid accredited analytes accredited analytes and water and solid accredited analytes and water and solid accredited analytes accredited a

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. Kune

Celey D. Keene Lab Director/Quality Manager



Analytical Results For:

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

Received:	05/17/2013	Sampling Date:	05/16/2013
Reported:	05/22/2013	Sampling Type:	Soil
Project Name:	BD M-26-1	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	T21S R37E SEC26 M ~ LEA CTY, NM		

Sample ID: 8 PT. COMP BLENDED BACKFILL (H301187-01)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: DW					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	05/20/2013	ND	416	104	400	0.00	

Cardinal Laboratories

*=Accredited Analyte

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Celecy D. Kune

Celey D. Keene, Lab Director/Quality Manager

Page 2 of 4



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

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Cardinal Laboratories

*=Accredited Analyte

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Celey D. Kune

Celey D. Keene, Lab Director/Quality Manager

Page 3 of 4

CARDINAL Laboratories

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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RICE ENVIRONMENTAL CONSULTING & SAFETY

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MODEL: PGM 7300 MODEL: PGM 7300 MODEL: PGM 7320 MODEL: PGM 7320 SERIAL NO: 590-000508 SERIAL NO: 590-000504 SERIAL NO: 592-903318 SERIAL NO: 590-000183

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SIGNATURE

5/15/2013 (DATE:



May 21, 2013

Hack Conder

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: BD M-26-1

Enclosed are the results of analyses for samples received by the laboratory on 05/15/13 16:43.

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 certifichtml.

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

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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:	05/15/2013	Sampling Date:	05/15/2013
Reported:	05/21/2013	Sampling Type:	Soil
Project Name:	BD M-26-1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	T21S R37E SEC26 M ~ LEA CTY, NM		

Sample ID: BLOWSAND (H301173-01)

Chloride, SM4500CI-B	mg/	'kg	Analyze	d By: DW					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	05/17/2013	· ND	432	108	400	0.00	

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Celuz D. Kune

Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

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ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
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***	Insufficient time to reach temperature.
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Celey D.Kune

Celey D. Keene, Lab Director/Quality Manager

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Page 3 of 4

CARDINAL Laboratories

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page 4 of 4

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Sampler - UPS - Bus - Other:	i

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RICE ENVIRONMENTAL CONSULTING & SAFETY

122 West Taylor Hobbs, NM 88240 PHONE: (505) 393-9174 FAX: (505) 397-147.1 PID MÉTER CALIBRATION & FIELD REPORT FORM



MODEL: PGM 7300 MODEL: PGM 7300 MODEL: PGM 7320 MODEL: PGM 7320 SERIAL NO: 590-000508 SERIAL NO: 590-000504 SERIAL NO: 592-903318 SERIAL NO: 590-000183

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

	LOT NO: HAL-248-100-1	EXPIRATION DATE: 7/1/2015	-
ĺ		METER READING ACCURACY: 100	•

ACCURACY (+/- 2%

· · ·	COMPANY_	 	-
	RICE OPERATING	 	· · ·
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	SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
<u> </u>	-+BD	M-26-1	M.	26	*T <u>*21-S</u>	R-37-R

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I verify that I have calibrated the above instrument in accordance to the manufacture operation manual.

1-SIGNATURE

DATE 5/24/2013



June 18, 2013

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

RE: BD M-26-1

Enclosed are the results of analyses for samples received by the laboratory on 06/17/13 16:15.

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_accred_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. Kune

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:	06/17/2013	Sampling Date:	06/17/2013
Reported:	06/18/2013	Sampling Type:	Soil
Project Name:	BD M-26-1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	T21S R37E SEC26 M \sim LEA CTY, NM		

Sample ID: BASE COARSE (H301394-01)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: DW		_			
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	06/18/2013	ND	432	108	400	0.00	

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and clerit's exclusive reimedy for any datim arising, whether based in contract or tort, shall be lanted to the amount pad by clerit for analyses. All clarins, including those for negligence and any other cause whistoever shall be deemed waived unless made in writing and received by clarinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be lable for incidental domages, including, within the state of or related to the performance of the services hereunder by Clarinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratores.

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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

⊃age 4 of

ARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603 (505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325)673-7020

Company Name: RICE Operating	_					酈	影響	鯽	ŧ!	<i>LL 70</i>		CARR.				ANAI	LYSIS	S RE	QUE	ST	-		
Project Manager: Hack Conder						Р.	0. #	: .	•			ľ				<i>.</i>							·
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oject #: Project Owner:						Ci	City:					0	Σ		Т	s//			•				
Project Name:							State: Zip:					e.	5	×	Texas TPH	Cations/Anions	TDS			-			
Project Location: BDM-26-1							Phone #:] <u>ਦ</u>	8015	μÌ									
Sampler Name: Dyllan Vorthous						Fa	Fax #:					Chlorides	Ξ	BTEX	x	Ü	F						ľ
FOR LAB USE ONLY		MATRIX				PRESERV SAMPLING					\overline{O}	TPH		Le:	e]	Ì				. .	
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PLEASE NOTE: Listibility and Damages. Cardina's liability and clear's exclusive remedy for any clean arising whether based in contract or tont, aball be kmiled to the amount paid by the client for the analyses. All claims including those for pegligence and any other cease whatscever shall be demined waived unless made in writing and received by Cardinal within 30 days after completion of the epplicable service. In no event splat Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of user (loss of pegligence and any other cease shall be demined by the client for the subsidiaries, artificates afficiency affi

Refinquished By:///	Time: E MAL HOUDOW	Phone Result: I Yes I No Add'l Phone #: Fax Result: I Yes I No Add'l Fax #: REMARKS: I Add'l Fax #: I Add'l Fax #:
Refingershed By	Time:	email results Zconder@rice-ecs.com; Bbaker@rice-ecs.com;
Delivered By: (Circle One)	Sample Condition CHECKED BY: Cool intact (Initials)	hconder@rice-ecs.com; Lweinheimer@rice-ecs.com; kjones@riceswd.com; Laura Pena, Kyle Norman
Sampler - UPS - Bus - Other:		ayarbrangh @ Nec-ecs. Com

+ Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

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			RE	:C5			
			CONSULTING	& GAPETY,	Le la constante de la constante		
			, PO <u>E</u>	3ox 5630			
			Phone: (5	NM 88241 75) 393-441 75) 393-0293	1	the transmission of the second s	<u></u>
		RE	VEGET A	ATION I	FORM		
	Information	<u> </u>	· ·				ı
Site name: U/L	BD M-26-1 Section	Township '	Range	' County	Latitude	Longitude	<u>t</u>
M	26 •	T-21-R	R-37-E	Lea	N 32*26.756'	w103*08.380*	
Contact Nămē: Email:	Hack Con		<u> </u>				
Site size:: 70?x1 7,500	Q5'	square feet	Map detai	l'of site attach	ed 🔲	· · · · · · · · · · · · · · · · · · ·	(
Additional'info	rmation:						
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Salvaged from Texnire: 'San		ioremediated		Blended sand i		Depth'(in):	
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:5/24/2013				11000			'
3. Bioreme	ilation.				· ••		
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Type: Lbs/acre:		<u></u>				2 Bags of Ma 6 Bags of Pot Mix	ñure ting
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4. Seedings					ain the site name and		i ·
Cuştom seed m	nx 🖌 🔤 Pres	scribed mix 💽 ,	Seed mix nan	10 lbs.	Lea County Mix, Race Horse Oats, Sudan Grass	Seeding date: 5/29/	2013
Broadcast 🛛 Method: Mecha	antant Chadow		,	•			
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Photos attached	· []	Observations:					
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	Kyle Normar	1 <u>7</u> 7		itle: Envir	onmental Tech	Date: 5/29/	2013
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BD M-26-1 (1R426-04) Unit Letter M, Section 26, T21S, R37E



site prior, facing east

5/13/2013



excavating the site, facing west 5/15/2013



importing blow sand, facing north 5/14/2013



exporting excavated soil to Sundance for disposal, facing west 5/15/2013



padding the completed excavation with 6 inches of blow sand, facing east 5/17/2013



20-mil, reinforced liner installed at approximately 5 ft bgs, facing northwest 5/17/2013



padding the liner with blow sand, facing north 5/17/2013



repairing the lease road, facing east 5/24/2013



seeding the backfilled site, facing east 5/29/2013



importing blow sand to contour the site to the surrounding area, facing east 5/23/2013



spreading amendments, facing north 5/29/2013



site complete, facing east

5/29/2013