

1R - 426-04

## REPORTS

DATE:

6-27-13

**Rice Environmental Consulting & Safety**

P.O. Box 2948, Hobbs, NM 88241

Phone 575.393.2967

RECEIVED OCD

CERTIFIED MAIL

RETURN RECEIPT NO. 7008 1140 0001 3072 4994

2013 JUL -1 P 2: 18

**June 27<sup>th</sup>, 2013**

**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 17<sup>th</sup>, 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 19<sup>th</sup>, 2011, seven soil bores (SB-1 through SB-7) were advanced through the former junction box site on May 23<sup>rd</sup>, May 24<sup>th</sup>, and June 6<sup>th</sup>, 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 25<sup>th</sup>, 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 17<sup>th</sup>, 2011, a Report of Further Investigation was submitted to NMOCD, and was approved on November 22<sup>nd</sup>, 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 4<sup>th</sup>, 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 18<sup>th</sup>, 2012, which was approved on June 27<sup>th</sup>, 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 17<sup>th</sup>, 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 20<sup>th</sup>, 2012, ROC submitted a Plug and Abandon Report of MW-1.

A CAP Addendum was submitted to NMOCD on May 13<sup>th</sup>, 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 8<sup>th</sup>, 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 field tested for hydrocarbons returning a result of 16.1 ppm. The 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 20-mil 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.

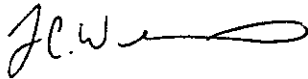
Silt net fencing was placed around the excavation to prevent erosion and maintain seed integrity. Soil amendments were added to the soil and the site was seeded with a blend of native vegetation.

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,

A handwritten signature in black ink, appearing to read 'JL.W.' followed by a stylized flourish.

Lara Weinheimer  
Project Scientist  
RECS  
(575) 441-0431

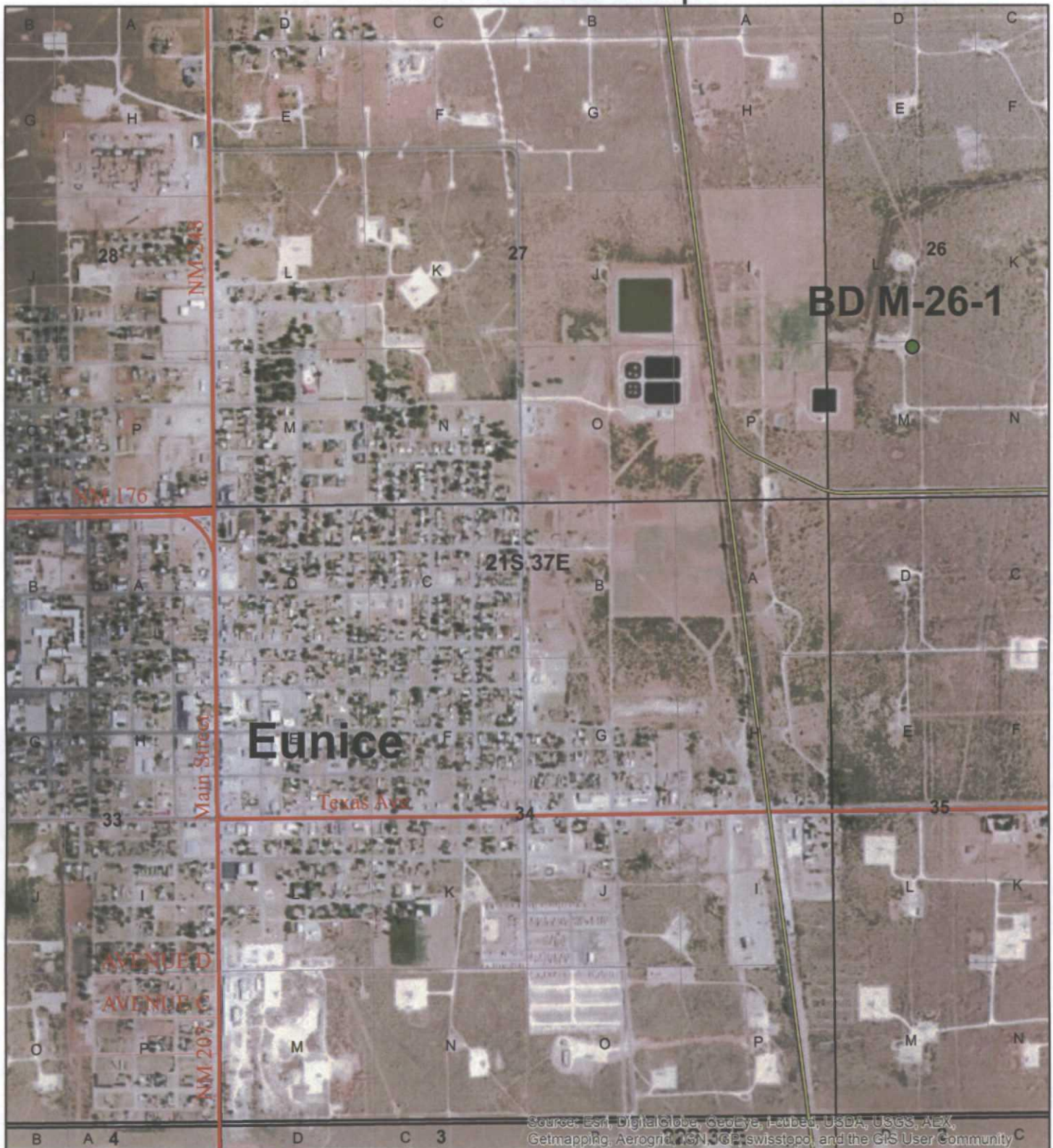
Attachments:

- 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



**BD M-26-1**

LEGALS: UL/M sec. 26  
T21S R37E

NMOCD Case #: 1R426-04

**Figure 1**

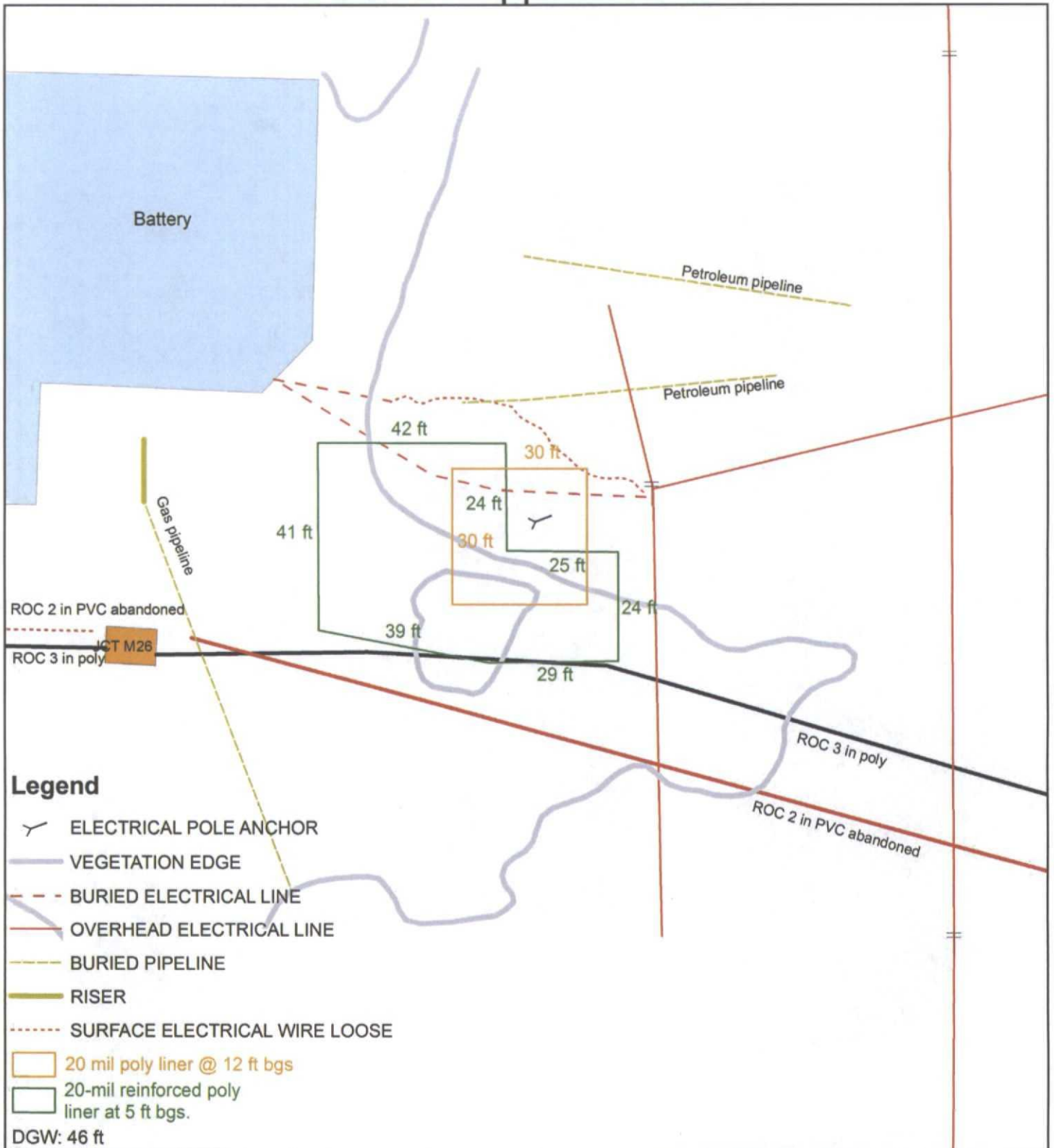


0 0.175 0.35  
Miles

Drawing date: 7-1-11  
Drafted by: L. Weinheimer



# NMOCD Approved Liner

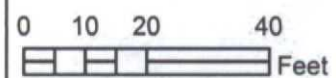


**BD M-26-1**

LEGALS: UL/M sec. 26  
T21S R37E

NMOCD Case #: 1R426-04

**Figure 2**



Drawing date: 6/18/13  
Drafted by: L. Weinheimer



# Appendix A

## Liner Installation Documentation

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

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

1	<b>N</b>		

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

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

ACCURACY:  $\pm 2\%$

COMPANY

## RICE OPERATING

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
RD.	M-26-I	M	26	T-21-S	R-37-B

[illegible]

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

**SIGNATURE:**

DATE: 5/16/2013.

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.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

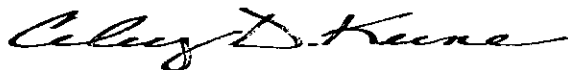
Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

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,



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		

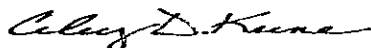
**Sample ID: 8 PT. COMP BLENDED BACKFILL (H301187-01)**

Chloride, SM4500Cl-B		mg/kg		Analyzed 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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Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

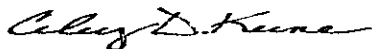
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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Celey D. Keene, Lab Director/Quality Manager



## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page 4 of 4

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**RICE ENVIRONMENTAL CONSULTING & SAFETY**

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

CK.  
MODEL  
NO.


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

4. GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

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

ACCURACY :  $\pm 2\%$

COMPANY	
PRICE OPERATING	

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
-BD-	M-26-1	M.	26	T-21-S	R-37-E

[illegible]

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

**SIGNATURE:**

DATE: 5/15/2013

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\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

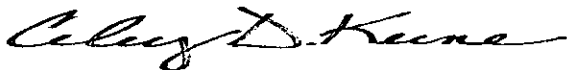
Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

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,



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  
Reported: 05/21/2013  
Project Name: BD M-26-1  
Project Number: NONE GIVEN  
Project Location: T21S R37E SEC26 M ~ LEA CTY, NM

Sampling Date: 05/15/2013  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: BLOWSAND (H301173-01)**

Chloride, SM4500Cl-B		mg/kg	Analyzed 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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\*=Accredited Analyte

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Celest D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

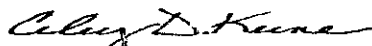
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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Celestine D. Keene, Lab Director/Quality Manager



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PHONE: (505) 393-9174 FAX: (505) 397-1471  
PID METER CALIBRATION & FIELD REPORT FORM

CK.	
MODEL.	
NO.	X

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

**GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE**

LÔT SỐ: HAL-248-100-1

EXPIRATION DATE: 7/1/2015

METER READING ACCURACY: 100

ACCURACY:  $\pm 2\%$

**COMPANY**

## RICE OPERATING

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
BD	M-26-1	M	26	T-21-S	R-37-E

[illegible]

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

**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.

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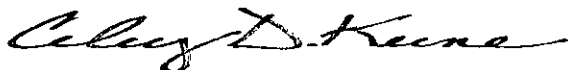
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Sincerely,



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 ~ LEA CTY, NM		

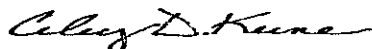
**Sample ID: BASE COARSE (H301394-01)**

Chloride, SM4500Cl-B		mg/kg		Analyzed 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	

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Celey D. Keene, Lab Director/Quality Manager

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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 SM4500Cl-B does not require samples be received at or below 6°C
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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager


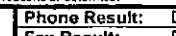


101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603  
(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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Relinquished By: 	Date: 6/17/13 Time: 4:15	Received By: Jodi Nensen	Phone Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Add'l Phone #:
Relinquished By:	Date: Time:	Received By:	Fax Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Add'l Fax #:
Delivered By: (Circle One) Sampler - UPS - Bus - Other:		Sample Condition Cool Intact <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	CHECKED BY: (Initials) 
			REMARKS: email results Zconder@rice-ecs.com; Bbaker@rice-ecs.com; hconder@rice-ecs.com; Lweinheimer@rice-ecs.com; kjones@riceswd.com; Laura Pena, Kyle Norman dvarbranch@rice-ecs.com

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



PO Box 5630  
Hobbs, NM 88241  
Phone: (575) 393-4411  
Fax: (575) 393-0293

## REVEGETATION FORM

### 1. General Information

Site name: BD M-26-1						
U/L M	Section 26	Township T-21-R	Range R-37-E	County Lea	Latitude: N 32°26.756'	Longitude W 103°08.380"
Contact Name: Hack Conder						
Email: hconder@rice-ecs.com						
Site size: 70' x 105'		square feet		Map detail of site attached <input type="checkbox"/>		
7,500						
Additional information:						

### 2. Soils

*\*Do not rip caliche subsoils; caliche rocks brought to the surface by ripping shall be removed.*

Salvaged from site <input type="checkbox"/>	Bioremediated <input type="checkbox"/>	Imported <input checked="" type="checkbox"/>	Blended <input checked="" type="checkbox"/>	Depth (in):
Texture: Sandy	Describe soil & subsoil: Blended sand and Top soil.			
Soil prep methods: Rip <input type="checkbox"/>	Depth (in):	Disc <input checked="" type="checkbox"/>	Depth (in): 3"	Rollerpack <input type="checkbox"/>
Date completed: 5/24/2013				

### 3. Bioremediation

Fertilizer <input type="checkbox"/>	Hay <input type="checkbox"/>	Other <input checked="" type="checkbox"/> 12 Bags of Restore
Type:		Describe: Nance,
Lbs/acre:		2 Bags of Manure
		6 Bags of Potting
		Mix

### 4. Seeding

*\*Attach seed bag tags to this form. Seed bag tags shall contain the site name and S-T-R.*

Custom seed mix <input checked="" type="checkbox"/>	Prescribed mix <input type="checkbox"/>	Seed mix name: 10 lbs. Lea County Mix, 10 lbs. Race Horse Oats, 10 lbs. Sudan Grass	Seeding date: 5/29/2013
Broadcast <input checked="" type="checkbox"/>			
Method: Mechanical Seeder			
Soil conditions during seeding: Dry <input checked="" type="checkbox"/> Damp <input type="checkbox"/> Wet <input type="checkbox"/>			
Photos attached <input type="checkbox"/>	Observations:		
Number of photos:	The Seed was disc into the soil.		

### 5. Certification

I hereby certify that the information in this form and attachments is true and complete to the best of my knowledge and belief.

Name: Kyle Norman	Title: Environmental Tech	Date: 5/29/2013
Signature: <i>Kyle Norman</i>		

BD M-26-1 (1R426-04)  
Unit Letter M, Section 26, T21S, R37E



site prior, facing east 5/13/2013



importing blow sand, facing north 5/14/2013



excavating the site, facing west 5/15/2013



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



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



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



spreading amendments, facing north  
5/29/2013



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



site complete, facing east 5/29/2013