Stephens & Johnson Operating Company North of 82 Section 1, Township 15 South, Range 37 East Lea County, New Mexico

Work Plan

July 28, 2009



Prepared for:

Stephens & Johnson Operating Company 811 Sixth Street, Suite 300 Wichita Falls, Texas 76301-2509

By:

Safety & Environmental Solutions, Inc. 703 East Clinton Hobbs, New Mexico 88240 (575) 397-0510

I. Background

Safety & Environmental Solutions, Inc. (SESI) was engaged by Stephens & Johnson Operating Company to perform a site assessment of the area located in Section 1, Township 15 South, and Range 37 East in Lea County, New Mexico. The subject area was impacted by the spillage of an undetermined amount of produced water from an injection line associated with production in the area on September 10, 2001. The remediation for this site was initiated in July 2003, however this site has been dormant for several years.

II. Surface and Ground Water

The nearest groundwater of record with the New Mexico State Engineer's Office is in Section 2 of Township 15 South, Range 37 East. According to measurements taken February 18, 1966, the depth to water in this well is 40 feet.

III. Soils

The soils in the area are predominantly sand and sandy loam.

IV. Work Performed

On May 12, 2009 Safety & Environmental Solutions, Inc was onsite to retrieve samples. Samples were retrieved at a depth of six (6) feet throughout the bottom and sides of the excavation. All samples were transported under Chain of Custody to Ana-Lab of Kilgore Texas for analysis. The samples were analyzed for Chlorides (EPA Method 300.00).

The results of the analysis are as follows:

DATE	ID	CI.
		(mg/kg)
5/12/09	#1	17300
5/12/09	#2	1220
5/12/09	#3	218
5/12/09	#4	4530
5/12/09	#5	15700
5/12/09	#6	3770
5/12/09	EW	4140
5/12/09	SW #1	7520
5/12/09	SW #2	6200
5/12/09	SW #3	7670
5/12/09	SW #4	30.5
5/12/09	NW #1	8010
5/12/09	NW #2	14800
5/12/09	NW #3	14600
5/12/09	NW #4	2600
5/12/09	WW	21100

The results of the sampling indicated the chloride levels to be elevated in the bottom and all of the sides of the excavation with the exception of the south wall #3.

V. Action Plan

Closure

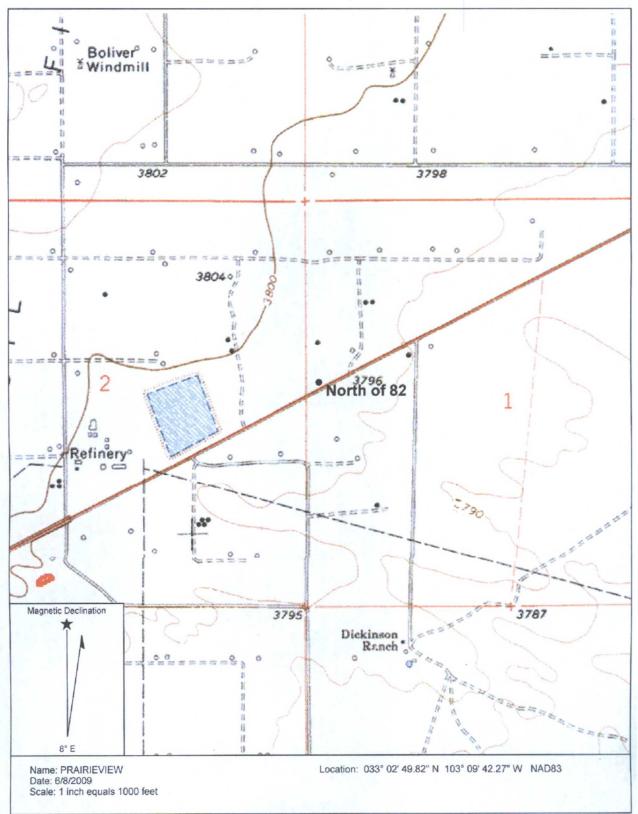
It is recommended that the site be excavated horizontally until the chloride concentrations are no greater than 250 ppm. An additional one (1) to two (2) feet will be removed from the bottom of the excavation. The excavated soil will be taken to a New Mexico Oil Conservation Division (NMOCD) approved disposal facility. The bottom and sides of the excavation will be sampled at the final excavation depths. The samples collected will be properly preserved and transported with Chain of Custody to Cardinal Laboratories, of Hobbs, New Mexico, for testing. Laboratory samples will be analyzed for Chlorides (EPA method 300.00). The analytical results will document the level of Chlorides left in place.

After the excavation is complete, a 40 mil plastic liner will be installed in the bottom of the excavation to prevent surface waters or future spills from coming into contact with the chloride left in place under the liner. Clean soil will be used to backfill the excavation and the site returned to natural grade. The location will be reseeded by the landowner's specifications.

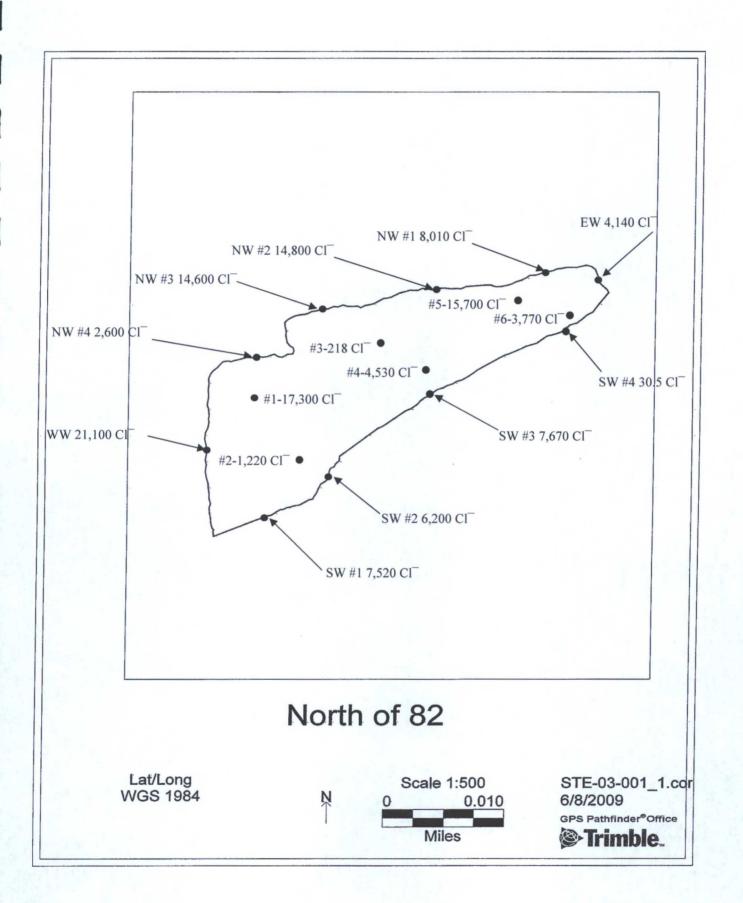
After completion of the delineation, a report of the findings and an appropriate work plan will be filed with the New Mexico Oil Conservation Division (NMOCD).

VI. Figures & Appendices

Figure 1 - Vicinity Map Figure 2 - Site Plan Appendix A – Analytical Results



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Analytical Results

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Report To

Brian Cuellar Safety & Environmental Solutio 703 E. Clinton Hobbs, NM 88240 Account

SESF

Project

442482

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This report consists of this Table of Contents and the following pages:

Report Name	Description	Pages
442482_r03_03_ProjectResults	Ana-Lab Project P:442482 C:SESF Project Results	7
442482_r10_05_PROJQCG	Ana-Lab Project P:442482 C:SESF Project Quality Control Groups	1
442482_r99_09_CoC_SESF_1_of_1	Ana-Lab CoC SESF 442482_1_of_1	3
	Total Pages:	11

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Report To

Account

SESF-P

Project 442482

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Results

	Results	
Accredited Parameter	Results Units RL Flags CAS	Bott
101309 #1	Received: 05	/14/200
Soil	Collected by: I Kincaid Affiliation: Safety & Environment 05/12/2005	14:4
SW-846 9056	Analyzed: GDG 05/15/2009 1838 QCgroup	31811
AN Chloride (water extractable)	17300 mg/kg 3000	02
101310 #2	Received: 05/	14/200
Soil	Collected by: I Kincaid Affiliation: Safety & Environment 05/12/2009	14:47
SW-846 9056	Analyzed: GDG 05/15/2009 1856 QCgroup	318119
4N Chloride (water extractable)	1220 mg/kg 60.0	02
101311 #3	Received: 05/1	14/200
Soil	Collected by: I Kincaid Affiliation: Safety & Environment 05/12/2009	14:49
SW-846 9056	Analyzed: GDG 05/15/2009 1913 QCgroup	318119
Chloride (water extractable)	218 mg/kg 30.0	02
101312 #4	Received: 05/1	4/2009
Soil	Collected by: I Kincaid Affiliation: Safety & Environment 05/12/2009	15:02
SW-846 9056		318119
V Chloride (water extractable)	4530 mg/kg 300	02
01313 #5	Received: 05/14	4/2009
Soil	Collected by: I Kincaid Affiliation: Safety & Environment 05/12/2009	15:04
SW-846 9056		318119
Chloride (water extractable)	15700 mg/kg 1500	02
01314 #6	Received: 05/14	/2009
Soil	Collected by: I Kincaid Affiliation: Safety & Environment 05/12/2009	15:06
SW-846 9056	Analyzed: GDG 05/15/2009 2006 QCgroup 3.	18119
Chloride (water extractable)	3770 mg/kg 300	02
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ccredited Parameter	Results	Units	RL	Flags	CAS		Bottle
101315 #EW					R	eceived: 05	5/14/2009
Soil	Collected by:	I Kincaid	Affiliation:	Safety & E	nvironment	05/12/200	9 15:10
SW-846 9056 AN Chloride (water extractable)	4140	An mg/kg	alyzed: GDG 300	05/15/2009	2024	<i>QCgroup</i>	<i>318119</i> 02
101316 SW#1		STATE OF THE STATE OF			Re	eceived: 05	/14/2009
Soil	Collected by:	I Kincaid	Affiliation:	Safety & En	nvironment	05/12/2009	15:12
SW-846 9056 Chloride (water extractable)	7520	And mg/kg	alyzed: GDG 300	05/15/2009	2041	QCgroup	<i>318119</i> 02
101317 SW#2					Re	ceived: 05/	14/2009
Soil	Collected by:	I Kincaid	Affiliation:	Safety & En	vironment	05/12/2009	15:14
SW-846 9056 Chloride (water extractable)	6200	Ana mg/kg	alyzed: GDG 300	05/15/2009	2059	QCgroup	<i>318119</i> 02
01318 SW#3					Rec	ceived: 05/	14/2009
Soil	Collected by: 1	Kincaid	Affiliation:	Safety & Env	vironment	05/12/2009	15:16
SW-846 9056		Anai	lyzed: GDG	05/15/2009	2117	QCgroup	318119
Chloride (water extractable)	7670	mg/kg	300				02
01319 SW#4					Rec	eived: 05/1	4/2009
Soil	Collected by: I	Kincaid	Affiliation:	Safety & Env	ironment	05/12/2009	15:18
SW-846 9056 Chloride (water extractable)	30.5	Analy mg/kg	vzed: GDG (6.00	05/15/2009	2152	QCgroup	318119 02
01320 NW#1					Rece	rived: 05/14	4/2009
Soil	Collected by: II	Cincaid	Affiliation:	Safety & Envi	ronment	05/12/2009	15:22
SW-846 9056	9010		zed: GDG 0	5/15/2009	2209	QCgroup 3	02
Chloride (water extractable)	8010	mg/kg		rion detec	Canada Cult	to 120 A manilla	
orporate Shipping: 2600 Dudley Rd. Kilgore, TX 75662		P	anhandle Re	gion: 4515 S. (Georgia Suit	te 129 Amarillo	T

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Results

	Re	esults					
Accredited Parameter	Results	Units	RL	Flags	CAS		Bottle
101321 NW#2					R	eceived:	05/14/2009
Soil	Collected by: I	Kincaid	Affiliation	Safety & I	Environment	05/12/2	009 15:24
SW-846 9056 AN Chloride (water extractable)	14800	A: mg/kg	nalyzed: GDG	G 05/15/2009	2227	QCgroup	318119 02
101322 NW#3					Re	eceived: 0	5/14/2009
Soil	Collected by: I	Kincaid	Affiliation:	Safety & E	nvironment	05/12/20	09 15:26
SW-846 9056 AN Chloride (water extractable)	14600	An mg/kg	nalyzed: GDG 600	05/15/2009	2245	QCgroup	318119 02
101323 NW#4	14000	mg/kg	000		Pa	ceived: 0	5/14/2009
Soil	Collected by: I I	Cincaid	Affiliation	Safety & En	nvironment	05/12/200	
SW-846 9056 AN Chloride (water extractable)	2600	And mg/kg	alyzed: GDG 150	05/15/2009	2302	<i>QCgroup</i>	318119 02
101324 WW					Red	ceived: 05	5/14/2009
Soil	Collected by: IK	incaid	Affiliation:	Safety & En	vironment	05/12/200	9 15:30
SW-846 9056			,	05/18/2009	0917	QCgroup	318119
4N Chloride (water extractable)	Sample Pro	mg/kg eparation	300				02
101309 #1					Reco	eived: 05/	14/2009
SW-846 9056 W Water Extract-Ion Chromatography	40/4	Anal _j	yzed: GDG	05/15/2009	1430	QCgroup	<i>318001</i> 01
101310 #2		8			Rece	ived: 05/	14/2009

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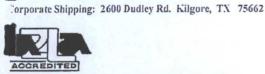
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Sample Preparation

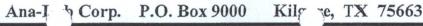
101310 Received: 05/14/2009 SW-846 9056 Analyzed: GDG 05/15/2009 **QCgroup** 1430 318001 Water Extract-Ion Chromatography 40/4 01 grams 101311 Received: 05/14/2009 SW-846 9056 Analyzed: GDG 05/15/2009 1430 318001 **QCgroup** 40/4 Water Extract-Ion Chromatography 01 grams 01312 #4 Received: 05/14/2009 SW-846 9056 Analyzed: GDG 05/15/2009 1430 318001 **QCgroup** 40/4 Water Extract-Ion Chromatography grams 101313 Received: 05/14/2009 #5 SW-846 9056 Analyzed: GDG 05/15/2009 318001 1430 **QCgroup** Water Extract-Ion Chromatography 40/4 01 Received: 05/14/2009 #6 101314 SW-846 9056 1430 Analyzed: GDG 05/15/2009 318001 **QCgroup** Water Extract-Ion Chromatography 40/4 Received: 05/14/2009 #EW 101315 SW-846 9056 Analyzed: GDG 05/15/2009 1430 318001 **QCgroup** Water Extract-Ion Chromatography 40/4 grams

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Sample Preparation

101322

101323

NW#3

Received: 05/14/2009

SW-846 9056

Water Extract-Ion Chromatography

Analyzed: GDG 05/15/2009

1430 **QCgroup** 318001

01

40/4

40/4

grams

Received: 05/14/2009

SW-846 9056

NW#4

Analyzed: GDG 05/15/2009

1430 **QCgroup**

318001 01

01324

Received: 05/14/2009

SW-846 9056

Water Extract-Ion Chromatography

Analyzed: GDG 05/15/2009

1430

318001

Water Extract-Ion Chromatography

40/4

grams

QCgroup

01

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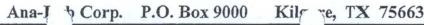
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Qualifiers:

We report results on an 'As Received' or wet basis unless marked 'Dry Weight'. Unless otherwise noted, testing was performed at Ana-lab's corporate laboratory that holds the following Federal and State certificates: Texas Department of Health Lead Firm Certificate 2110076, EPA National Lead Laboratory Accreditation Program #637.01, US Consumer Product Safety Commission #1095, US Department of Agriculture Soil Import Permit S-37592, Texas Commission on Environmental Quality Drinking Water Laboratory Certificate TX219, Texas Commission on Environmental Quality NELAP T104704201-06-TX, Oklahoma Department of Environmental Quality Drinking Water Certification Lab ID# D9913, EPA Lab Number TX00063, USEPA Approved Perchlorate Testing Lab, USEPA UCMR2 Approved Lab, Oklahoma Department of Environmental Quality Laboratory Certificate 8125, Arkansas Department of Environmental Quality Certification #03-070-0, Louisiana Department of Environmental Quality Laboratory Certification (NELAP, LELAP) #02008, Louisiana Department of Health and Hospitals Drinking Water (NELAP) # LA030020, US Department of Energy Approved, State of Kansas Department of Health and Environment Waste Water and Solid/Hazardous Waste Cert. E-10365, Alabama Department of Environmental Management Drinking Water #41540. Ana-Lab is also accredited to the international ISO-17025 standard by the American Association for Laboratory Accreditation (A2LA Certificate # 0637-01). The Accredited column designates accreditation by U -- UCMR2 (EPA), A --A2LA, N -- NELAC, or z -- not covered under one of these scopes of accreditation.

These analytical results relate to the sample tested. This report may NOT be reproduced EXCEPT in FULL without written approval of Ana-Lab Corp. Unless otherwise specified, these test results meet the requirements of NELAC.

RL is the Reporting Limit (sample specific quantitation limit) and is at or above the Method Detection Limit (MDL), CAS is Chemical Abstract Service number.

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C. H. Whiteside, Ph.D., President

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Chloride (water extractable)		10.2	10.0	mg/kg	102	90.0 - 110		0000840796				
hloride (water extractable)		10.2	10.0	mg/kg	102	90.0 - 110		0000840798				
hloride (water extractable)		10.2	10.0	mg/kg	102	90.0 - 110		0000840812				
Chloride (water extractable)		10.2	10.0	mg/kg	102	90.0 - 110		0000840822				
hloride (water extractable)		10.2	10.0	mg/kg	102	90.0 - 110		0000840825				
hloride (water extractable)		10.3	10.0	mg/kg	103	90.0 - 110		0000840823				
				LCS								
arameter	PrepSet	Reading		Known	Units	Recover%	Limits	File	Out			
nloride (water extractable)	318001	0.948		1.00	mg/kg	94.8	90.0 - 110	0000840800				
				LCS D	ıp							
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iloride (water extractable)	318001	0.948	1.09		1.00	90.0 - 110	94.8	109	mg/kg	13.9	20.0	

RPD is Relative Percent Difference: abs(r1-r2) / mean(r1,r2) * 100%

Recover% is Recovery Percent: result / known * 100%

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CORP. Affiliation ☐ Wastewater ☐ Drinking Water ☐ SW846 Analysis Requested Alabama 256.830.0788 ##comment Panhandle Oklahoma North-TX Central- TX 806.355.3556 405.292.6630 817.261.6404 512.821.0045 003233 003532 003689 Oother Gulf Coast 281.333.9414 Signature D PHL ArkLaMiss (318.219.9300 d-82 Anna-Lab ☐ Hand delivered Comments Zip Received by -08-00 Rio Grand Valley 956.831.6437 Christi Perker Billing (if different) Umber 1915 | Done Star | UPS PO Number Fax Complerate Comp(Grab) CompGrab CompGrab Comp/Grab) Comparad Comp/Grab Comp/Grab Comp/Grab Comp/Grab State Project - Name / Location Containers Affillation 5.00 Phone CN Matrix City Tracking or Shipping Number □ next day Is Hazardous for: ☐ HF 1526 1528 Time Kincail Client Code: Method of Shipment 888240 F.mail 6/21/5 Date Kilgore, TX 75662 903.984.0551 (x) 903.984.5914 e-mail: corp@ana-lab.com □ 2 Day other## 2600 Dudley Rd PO Box 9000 Field Identification □ 3 day ON D Date: | Time: Relinquished by Samples Received on Ice? \(\text{TYes} \) Yes Printed Name Cooler/Sample Secure? Sampler Signature Company name: Requested TAT ab Number Do Not Use Report to: Address: 1400