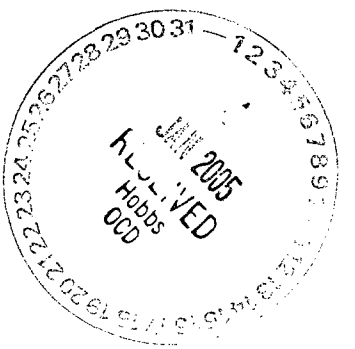
eTECH
Environmental & Safety Solutions, Inc.

Report

Truckers Number 2 Brine Station
Subsurface Investigation

Prepared For:
Key Energy Services, Inc.
6 Desta Drive, Suite 4400
Midland, TX 79705



Issue Date: November 17, 2004
Project Number: 035-387-M

facility - fPAC0610028545
app- pPAC0610028646

P.O. Box 8469 Midland ∘ TX ∘ 79708-8469 ∘ Tel: 432-563-2200 ∘ Fax: 432-563-2213

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Summary

On November 8, 2004 Etech Environmental & Safety Solutions, Inc. (Etech) performed a subsurface investigation at the Truckers Number 2 Brine Station in Hobbs, New Mexico. The purpose of the investigation was to determine the vertical extent of chloride contamination in a drainage collection area located to the west of the brine pit.

The investigation involved the advancement of two (2) soil borings to a depth of thirty-two (32) feet below ground surface (bgs), sampling and field screening of soils and laboratory analyses of selected samples.

Following completion of the field activities and laboratory analyses, it has been determined that the majority of the vertical extent of the chloride contamination appears to be confined within the upper 6-10 feet of soils. However, soils contaminated with chlorides are slightly above the regulatory level of 250 mg/kg were found to a depth of 15 feet.

A review of the soil samples taken during the soil borings found the majority of the subsurface soils to be caliche. A tight, well-cemented sandstone formation was noted at approximately twenty to twenty-two (20-22) feet.

Introduction

On November 8, 2004 Etech Environmental & Safety Solutions, Inc. (Etech) performed a subsurface investigation at the Truckers Number 2 Brine Station in Hobbs, New Mexico. The site is operated by Key Energy Services, Inc. The purpose of the investigation was to determine the vertical extent of chloride contamination in a drainage collection area located to the west of the brine pit.

The scope of the investigation involved the following:

- Advance soil borings to a maximum depth of sixty (60) feet.
- Perform on-site screening of soil samples for chlorides
- Send selected samples for laboratory analyses for chlorides

The following summarizes the on-site activities and the results of the laboratory analyses.

Soil Borings

Two (2) soil borings sites were selected and labeled SB-4 and SB-5. This was done to keep the borings sequential with other borings performed in previous investigations. Each soil boring was advanced using air-rotary drilling rig. The sampling program called for split spoon samples to be taken every five (5) feet for the first twenty (20) feet then every ten (10) feet until total depth was reached. Grab samples of the drill cuttings were to be taken in two (2) foot intervals between split spoon samples.

SB-4 is located 33 feet west of the brine pit towards the southern quarter of the drainage collection area. The latitude and longitude of the boring is as follows:

Latitude: N32 42.071
Longitude: W103 09.340

SB-5 is located 27 feet west of the brine pit towards the northern quarter of the drainage collection area. The latitude and longitude of the boring is as follows:

Latitude: N32 42.082
Longitude: W103 09.342

A diagram showing the location of each boring is provided for review in Attachment A.

SB-4 was advanced to thirty (30) feet bgs. SB-5 was advanced to thirty-two (32) feet bgs. Soil borings were terminated at these depths when field screening indicated the chloride levels were below the 250 mg/kg objective for a sustained ten (10) foot interval. Once the borings were completed, they were backfilled to surface using bentonite chips.

The lithology of each boring was uniform. The soils throughout each boring were largely caliche. At twenty to twenty-two (20-22) feet bgs, a tight, well cemented, sandstone was encountered. This formation did slow the advancement of each boring and resulted in a reduced amount of sample recovery in the split spoon sample taken at that depth.

Field Screening & Analyses

Samples were screened on-site for chlorides. A portion of each sample was taken and a liquid extract created. The extract was then titrated for chlorides. The field screening indicated there were elevated levels of chlorides to approximately five to six (5-6) feet. At this point, the chloride levels significantly reduce until fifteen to seventeen (15-17) feet when they reach a point below the target level of 250 mg/kg. A copy of the field screening sheet is provided for review in Attachment B.

Based upon the data from the field screening, select samples were taken and analyzed for chlorides via EPA Method 300. The results of the analyses are listed in Table 1, presented below:

Table 1
Laboratory Analyses for Chlorides

Boring	Depth (Feet)	Chlorides (mg/kg)
Background	(Surface)	74.7
SB-4	6-7	1460
SB-4	10-11	382
SB-4	17-20	159
SB-5	5'	2770
SB-5	14-15	484
SB-5	24-25	116

The five (5) foot sample from SB-5 was subjected to additional analyses for cations and anions. This was done to give an overall picture of the soils general chemistry. The results of the analyses indicate there is a very high level of calcium (159,000) mg/kg. This would be expected given the nature of the soil. The exact amount of free calcium, or readily soluble calcium, is unknown. However, this information may be useful when selecting a method of mitigation. Copies of the analytical results are provided for review in Attachment C.

Quality Assurance & Quality Control

Field samples were individually bagged and labeled immediately after sampling. All sampling equipment used to take samples was decontaminated between each use. All samples subjected to field screening were placed in certified clean glass bottles prior to field screening. All equipment used for field screening was either single-use or decontaminated between each use. The drilling string was decontaminated between each boring.

Conclusion

Following completion of the field activities and laboratory analyses, it appears the majority of the vertical extent of the chloride contamination appears to be confined within the upper 6-10 feet of soils. Chloride levels above the regulatory level of 250 mg/kg were found to depths of at least 11 feet in one boring and 15 feet in the other boring.

Prepared By:

Fred Holmes B.Sc.
Etech Environmental & Safety Solutions, Inc.

Attachment A
Site Diagram

UNLOCK YOUR POTENTIAL

December 29, 2004

Mr. Wayne Price
New Mexico Oil Conservation District
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Hobbs Trucker's Number 2 Brine Station Subsurface Investigation Report

Dear Mr. Price:

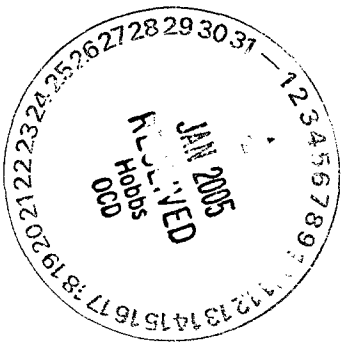
Enclosed for your review you will find the Hobbs Trucker's Number 2 Brine Station Subsurface Investigation Report.

Please contact me after you have reviewed the report to discuss future site activities.

Sincerely,

Jason Henry
Corporate Environmental Specialist

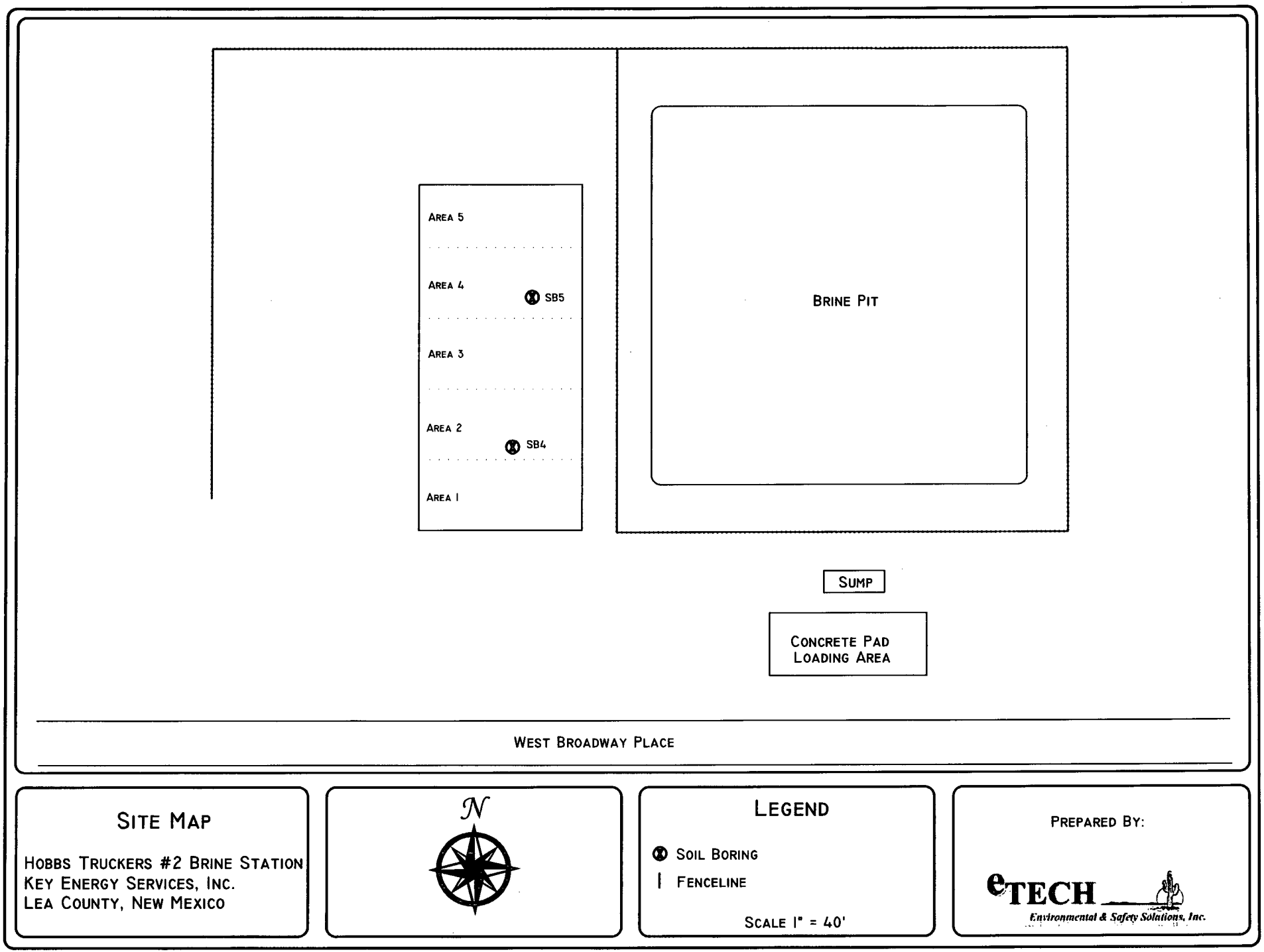
Enclosure



cc: Mr. Paul Sheeley
New Mexico Oil Conservation District
1625 N. French Drive
Hobbs, New Mexico 88240

Mr. Pete Turner
Key Energy Services, Inc.
418 S. Grimes
Hobbs, New Mexico 88240

File: NM-7020



SITE MAP

HOBBS TRUCKERS #2 BRINE STATION
KEY ENERGY SERVICES, INC.
LEA COUNTY, NEW MEXICO

N

LEGEND

- SOIL BORING
- FENCELINE

SCALE 1" = 40'

PREPARED BY:

eTECH
Environmental & Safety Solutions, Inc.

Attachment B
Field Screening Log

Field Analysis Sheet

Date: 11/9/2004 **Client:** Key Energy Services

Site: Hobbs Truckers #2 **Project Number:** 035-387

Technican: Jaime Craig **Contaminant:** Chlorides

Sample ID	Milliliters of Sample Used	Dilution	AgNO3 0.028(N)	Result (mg/kg)	Notations
SB4 6-7'	1	2	0.580	575.708	Sent to lab for Chlorides 300.0 Method
SB4 7-8'	1	2	0.500	496.3	
SB4 9-10'	1	2	0.510	506.226	
SB4 10-11'	1	2	0.300	297.78	Sent to lab for Chlorides 300.0 Method
SB4 12-13'	1	2	0.350	347.41	
SB4 14-15'	1	2	0.300	297.78	
SB4 15-17'	1	2	0.200	198.52	
SB4 17-18'	1	2	0.200	198.52	
SB4 17-20'	1	2	0.200	198.52	Sent to lab for Chlorides 300.0 Method
SB4 21-22'	1	2	0.200	198.52	
SB4 24-25'	1	2	0.100	99.26	
SB4 26-27'	1	2	0.150	148.89	
SB4 28-29'	1	2	0.100	99.26	
SB4 30'	1	2	0.100	99.26	
SB5 5'	1	2	1.200	1191.12	Sent to lab for Chlorides 300.0 Method
SB5 7-8'	1	2	0.900	893.34	
SB5 9-10'	1	2	0.700	694.82	
SB5 10-12'	1	2	0.600	595.56	
SB5 12-13'	1	2	0.500	496.3	
SB5 14-15'	1	2	0.400	397.04	Sent to lab for Chlorides 300.0 Method
SB5 15-17'	1	2	0.300	297.78	
SB5 17-18'	1	2	0.300	297.78	
SB5 19-20'	1	2	0.200	198.52	
SB5 22'	1	2	0.200	198.52	
SB5 24-25'	1	2	0.200	198.52	Sent to lab for Chlorides 300.0 Method
SB5 26-27'	1	2	0.200	198.52	
SB5 28-29'	1	2	0.200	198.52	
SB5 30-32'	1	2	0.100	99.26	
BACKGROUND	1	2	0.200	198.52	Sent to lab for Chlorides 300.0 Method

F = (ml $AgNO_3$)(N)(35450)/ml. sample used

Attachment C
Analytical Results

ENVIRONMENTAL LAB OF

12600 West I-20 East - Odessa, Texas 79765

Analytical Report

Prepared for:

Shane Estep

E Tech Environmental & Safety Solutions, Inc.

P.O. Box 8469

Midland, TX 79708-8469

Project: Hobbs Truckers #2 Brine Station

Project Number: 035-387

Location: None Given

Lab Order Number: 4K10003

Report Date: 11/15/04

E Tech Environmental & Safety Solutions, Inc.	Project: Hobbs Truckers #2 Brine Station	Fax: 563-2213
P.O. Box 8469	Project Number: 035-387	**Reported:**
Midland TX, 79708-8469	Project Manager: Shane Estep	11/15/04 15:08

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
BG	4K10003-01	Soil	11/08/04 00:00	11/09/04 17:10
SB4 6-7'	4K10003-02	Soil	11/08/04 00:00	11/09/04 17:10
SB4 10-11'	4K10003-03	Soil	11/08/04 00:00	11/09/04 17:10
SB4 17-20'	4K10003-04	Soil	11/08/04 00:00	11/09/04 17:10
SB5 5'	4K10003-05	Soil	11/08/04 00:00	11/09/04 17:10
SB5 14-15'	4K10003-06	Soil	11/08/04 00:00	11/09/04 17:10
SB5 24-25'	4K10003-07	Soil	11/08/04 00:00	11/09/04 17:10

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E Tech Environmental & Safety Solutions, Inc.	Project: Hobbs Truckers #2 Brine Station	Fax: 563-2213
P.O. Box 8469	Project Number: 035-387	**Reported:**
Midland TX, 79708-8469	Project Manager: Shane Estep	11/15/04 15:08

General Chemistry Parameters by EPA / Standard Methods

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
SB5 5' (4K10003-05) Soil									
Carbonate Alkalinity	**8.00**	0.100	mg/kg	1	EK41102	11/10/04	11/10/04	EPA 310.2M	
Bicarbonate Alkalinity	**52.0**	2.00	"	"	"	"	"	"	
Hydroxide Alkalinity	ND	0.100	"	"	"	"	"	"	
% Moisture	**18.0**		%	"	EK41201	11/11/04	11/12/04	% calculation	
Sulfate	**557**	5.00	mg/kg	10	EK41207	11/10/04	11/11/04	EPA 9038	

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P.O. Box 8469	Project Number: 035-387	**Reported:**
Midland TX, 79708-8469	Project Manager: Shane Estep	11/15/04 15:08

Total Metals by EPA / Standard Methods

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
SB5 5' (4K10003-05) Soil									
Calcium	**159000**	1000	mg/kg dry	100000	EK41011	11/10/04	11/10/04	EPA 6010B	
Magnesium	**1940**	1.00	"	1000	"	"	"	"	
Potassium	**207**	5.00	"	100	"	"	"	"	
Sodium	**2980**	10.0	"	1000	"	"	"	"	

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P.O. Box 8469	Project Number: 035-387	**Reported:**
Midland TX, 79708-8469	Project Manager: Shane Estep	11/15/04 15:08

Anions by EPA Method 300.0

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
BG (4K10003-01) Soil									
Chloride	**74.7**	10.0	mg/kg	1	EK41213	11/11/04	11/11/04	EPA 300.0	
SB4 6-7' (4K10003-02) Soil									
Chloride	**1460**	500	mg/kg	50	EK41213	11/11/04	11/11/04	EPA 300.0	
SB4 10-11' (4K10003-03) Soil									
Chloride	**382**	100	mg/kg	10	EK41213	11/11/04	11/11/04	EPA 300.0	
SB4 17-20' (4K10003-04) Soil									
Chloride	**159**	20.0	mg/kg	2	EK41213	11/11/04	11/11/04	EPA 300.0	
SB5 5' (4K10003-05) Soil									
Chloride	**2770**	500	mg/kg	50	EK41213	11/11/04	11/11/04	EPA 300.0	
SB5 14-15' (4K10003-06) Soil									
Chloride	**484**	200	mg/kg	20	EK41213	11/11/04	11/11/04	EPA 300.0	
SB5 24-25' (4K10003-07) Soil									
Chloride	**116**	10.0	mg/kg	1	EK41213	11/11/04	11/11/04	EPA 300.0	

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General Chemistry Parameters by EPA / Standard Methods - Quality Control

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EK41102 - Water Extraction										
Blank (EK41102-BLK1)				Prepared & Analyzed: 11/10/04						
Carbonate Alkalinity	ND	0.100	mg/kg							
Bicarbonate Alkalinity	ND	2.00	"							
Hydroxide Alkalinity	ND	0.100	"							
Duplicate (EK41102-DUP1)		**Source: 4K10003-05**		Prepared & Analyzed: 11/10/04						
Carbonate Alkalinity	8.00	0.100	mg/kg		8.00			0.00	20	
Bicarbonate Alkalinity	52.0	2.00	"		52.0			0.00	20	
Hydroxide Alkalinity	0.00	0.100	"		0.00				20	
Reference (EK41102-SRM1)				Prepared & Analyzed: 11/10/04						
Carbonate Alkalinity	0.0500		mg/kg	0.0500		100	80-120			
Batch EK41201 - General Preparation (Prep)										
Blank (EK41201-BLK1)				Prepared: 11/11/04 Analyzed: 11/12/04						
% Moisture	0.0		%							
Duplicate (EK41201-DUP1)		**Source: 4K11002-01**		Prepared: 11/11/04 Analyzed: 11/12/04						
% Moisture	15.0		%		15.0			0.00	20	
Batch EK41207 - Water Extraction										
Blank (EK41207-BLK1)				Prepared: 11/10/04 Analyzed: 11/11/04						
Sulfate	ND	2.50	mg/kg							
Calibration Check (EK41207-CCV1)				Prepared & Analyzed: 11/11/04						
Sulfate	48.1		mg/kg	50.0		96.2	80-120			

General Chemistry Parameters by EPA / Standard Methods - Quality Control

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EK41207 - Water Extraction										
Duplicate (EK41207-DUP1)	**Source: 4K10003-05**			Prepared: 11/10/04 Analyzed: 11/11/04						
Sulfate	565	5.00	mg/kg		557			1.43	20	

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P.O. Box 8469	Project Number: 035-387	**Reported:**
Midland TX, 79708-8469	Project Manager: Shane Estep	11/15/04 15:08

Total Metals by EPA / Standard Methods - Quality Control

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EK41011 - 6010B/No Digestion										
Blank (EK41011-BLK1)				Prepared & Analyzed: 11/10/04						
Calcium	ND	0.0100	mg/kg wet							
Magnesium	ND	0.00100	"							
Potassium	ND	0.0500	"							
Sodium	ND	0.0100	"							
Calibration Check (EK41011-CCV1)				Prepared & Analyzed: 11/10/04						
Calcium	2.00		mg/kg	2.00		100	85-115			
Magnesium	2.17		"	2.00		108	85-115			
Potassium	1.76		"	2.00		88.0	85-115			
Sodium	1.76		"	2.00		88.0	85-115			
Duplicate (EK41011-DUP1)	**Source: 4K10003-05**			Prepared & Analyzed: 11/10/04						
Calcium	161000	1000	mg/kg dry		159000			1.25	20	
Magnesium	1970	1.00	"		1940			1.53	20	
Potassium	210	5.00	"		207			1.44	20	
Sodium	3050	10.0	"		2980			2.32	20	
Duplicate (EK41011-DUP2)	**Source: 4K09013-01**			Prepared & Analyzed: 11/10/04						
Calcium	18600	100	mg/kg wet		17100			8.40	20	
Magnesium	390	0.100	"		383			1.81	20	
Sodium	853	10.0	"		785			8.30	20	

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Anions by EPA Method 300.0 - Quality Control

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EK41213 - General Preparation (Subcontract)										
Blank (EK41213-BLK1)				Prepared & Analyzed: 11/11/04						
Chloride	ND	10.0	mg/kg							
LCS (EK41213-BS1)				Prepared & Analyzed: 11/11/04						
Chloride	31.8		mg/L	30.0		106	90-110			
Matrix Spike (EK41213-MS1)	**Source: 4K10003-01**			Prepared & Analyzed: 11/11/04						
Chloride	97.1		mg/L	30.0	74.7	74.7	80-120			S-08
Matrix Spike Dup (EK41213-MSD1)	**Source: 4K10003-01**			Prepared & Analyzed: 11/11/04						
Chloride	106		mg/L	30.0	74.7	104	80-120	8.76	20	

E Tech Environmental & Safety Solutions, Inc.	Project: Hobbs Truckers #2 Brine Station	Fax: 563-2213
P.O. Box 8469	Project Number: 035-387	**Reported:**
Midland TX, 79708-8469	Project Manager: Shane Estep	11/15/04 15:08

Notes and Definitions

S-08	Value outside Laboratory historical or method prescribed QC limits.
DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
RPD	Relative Percent Difference
LCS	Laboratory Control Spike
MS	Matrix Spike
Dup	Duplicate

Report Approved By: Raland K Tuttle Date: 11/15/04

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer
Jeanne Mc Murrey, Inorg. Tech Director
James L. Hawkins, Chemist/Geologist
Sandra Sanchez, Lab Tech.

Environmental Lab of Texas

12600 West I-20 East
Odessa, Texas 79765
Phone: 432-563-1800
Fax: 432-563-1713

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: Eric Weaver / Shane Estep
Company Name Etech Environmental & Safety Solutions
Company Address: P.O. Box 8469
City/State/Zip: Midland, TX 79708
Fred 631-3757
Telephone No: 432/563-2200 **Fax No:** 432/563-2213
Sampler Signature: Jaime Cruz

Project Name: Hobbs Truckers #2 Brine Stn
Project #: ~~035~~ 035-387
Project Loc:
PO #:

4K10003

LAB # (lab use only)	FIELD CODE	Date Sampled	Time Sampled	No. of Containers plastic bag	Preservative: Ice	HNO_3	HCl	NaOH	H_2SO_4	None	Other (Specify)	Matrix: Water	Sludge	Soil	Other (specify):	Analyze For: TCLP: TPH: 418.1 8015M 1005 1008	Cations (Ca, Mg, Na, K)	Anions (Cl, SO4, CO3, HCO3)	SAR / ESP / CEC	Metals: As Ag Ba Cd Cr Pb Hg Se	Volatiles	Semivolatiles	BTEX 8021B/5030 or BTEX 8260	RCI	N.O.R.M.	TOTAL: Chlorides 300.0 m			RUSH TAT (Pre-Schedule)	Standard TAT
-01	BG	11.8.04		1						✓				✓												✓				✓
-02	SB4 6-7'	11.8.04		1						✓				✓												✓				✓
-03	SB4 10-11'	11.8.04		1						✓				✓												✓				✓
-04	SB4 17-20'	11.8.04		1						✓				✓												✓				✓
-05	SB5 5'	11.8.04		1						✓				✓			✓	✓												✓
-06	SB5 14-15'	11.8.04		1						✓				✓												✓				✓
-07	SB5 24-25'	11.8.04		1						✓				✓												✓				✓

Special Instructions:
11-9-04

Relinquished by:	Date	Time	Received by:	Date	Time
Jaime Cruz	~~11-8-04~~	1710			
Relinquished by:	Date	Time	Received by ELOT:	Date	Time
			Jana McMurrey	11-09-04	1710

Sample Containers Intact? (Y) N
Temperature Upon Receipt: 21.5 c
Laboratory Comments:

Environmental Lab of Texas
Variance / Corrective Action Report – Sample Log-In

Client: E Tech Env.

Date/Time: 11-10-04 @ 0850

Order #: HK10003

Initials: JMM

Sample Receipt Checklist

Temperature of container/cooler?	(Yes)	No	21.5 C
Shipping container/cooler in good condition?	Yes	No	N/A
Custody Seals intact on shipping container/cooler?	Yes	No	Not present N/A
Custody Seals intact on sample bottles?	Yes	No	(Not present)
Chain of custody present?	(Yes)	No	
Sample Instructions complete on Chain of Custody?	(Yes)	No	
Chain of Custody signed when relinquished and received?	(Yes)	No	
Chain of custody agrees with sample label(s)	Yes	No	No Label - written on bag
Container labels legible and intact?	Yes	No	No Label - written on bag
Sample Matrix and properties same as on chain of custody?	(Yes)	No	
Samples in proper container/bottle?	(Yes)	No	
Samples properly preserved?	Yes	(No)	SO4 + AlK should be @ 4°C
Sample bottles intact?	(Yes)	No	
Preservations documented on Chain of Custody?	(Yes)	No	
Containers documented on Chain of Custody?	(Yes)	No	
Sufficient sample amount for indicated test?	(Yes)	No	
All samples received within sufficient hold time?	(Yes)	No	
VOC samples have zero headspace?	Yes	No	(Not Applicable)

Other observations:

Variance Documentation:

Contact Person: - Fred Holmes Date/Time: 11-10-04 @ 0930 Contacted by: Roland Tuttle

Regarding: temperature for SO4 + Alkalinity (CO_3/HCO_3) in soil

Corrective Action Taken: Informed Client SO4 + Alkalinity (CO_3/HCO_3) in soil should be @ 4°C
Client wishes to continue with analysis

* Jeanne spoke with Fred 11-10-04 @ 0830 to confirm method for chloride on SB5 @ 5' is 300.0.
Fred said to run 300.0 on chloride and the rest of anions per regular anion analytical methods