

ENVIRONMENTAL SITE
ASSESSMENT
Plantation Operating, LLC
Britt A-6 #3
Spill

OK -
Released to fill in
checked analytical
Chris Williams
6/25/07

Prepared for
John Allred
Approach Operating
2203 Timberloch Place, Suite 229
The Woodlands, TX 77380


Chad Gregson,
Environmental Scientist

June 15, 2007

White Buffalo Environmental Services
5425 Ben Ficklin Rd.
San Angelo, TX 76904



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Laboratory Reports and Chain of Custody 5-26-07

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1.0 INTRODUCTION

1.1 Project Background

White Buffalo Environmental Services was retained by John Allred on behalf of Plantation Operating, LLC to conduct an Environmental Site Assessment (ESA) and necessary cleanup on the Britt A-6 #3 located in Monument, NM. The 60 bbl release was reported to the Oil Conservation Division of New Mexico.

1.2 Project Objective

The objective of this ESA was to identify and quantify the Britt A-6 #3 Tank Battery spill contamination onto the surrounding soil and to remove the contamination. From interviews and on site investigation it was obvious that the spill had discharged oil on an area approximately 50ft. wide and 114ft. long north of the tank battery and an area approximately 8 ft. long and 17 ft wide south of the tank. (See attached site map) Plantation Operating LLC employee (William Pilkington) contracted RMA Roustabout Service, Inc. out of Lovington, NM to excavate the contaminated soil over the entire spill area and properly remove the soil offsite to a local landfill. (See attached site Map).

2.0 Scope of Services

Perform ESA via visual inspection and sample collection after excavation to verify contamination is removed. A total of eight samples were collected on 4-26-07 from the surface after excavating the entire spill area. Total Petroleum Hydrocarbons (TRPH) method 8015N, Benzene, Toluene, Ethyl benzene, Xylene (BTEX) method 8260 GC/MS, and Chlorides method 300 Ion Chromatography analysis was performed on each sample. See collection point map and analytical results. The Bureau of Land Management (BLM) and The Oil Conservation Division (OCD) of New Mexico were contacted and informed of the 60 bbl spill and the clean up.

3.0 CHRONOLOGY

White Buffalo Environmental Services, Inc. of San Angelo, TX, was contracted to do the necessary ESA to obtain the need information to remediate the contaminated soil located around the tank battery of the Britt A-6 #3 well. Initially eight samples were collected from the site and surrounding area on 4-26-07 after the excavation. These samples will be used to verify that all of the contaminated soil from the oil release is properly removed from the site to below OCD regulatory limits. The soil samples were collected with a decontaminated, rinsed, aluminum hand scoop and immediately placed in appropriately labeled, sealed, 4-oz. glass containers with Teflon lids. The samples were immediately placed in an ice chest and transported to White Buffalo Environmental Services for sample preparation. The samples were transported to ASK Laboratories, Inc. located in Amarillo, TX to be analyzed for Total Petroleum Hydrocarbons (TRPH) method 8015N, Benzene, Toluene, Ethyl benzene, Xylene (BTEX) method 8260 GC/MS, and Chlorides method 300 Ion Chromatography.

The sample locations and field control information is summarized below. Compare to site map locations.

FC#	Description	Date	Time
01	Soil #1	4-26-07	3:00
02	Soil #2	4-26-07	3:05
03	Soil #3	4-26-07	3:10
04	Soil #4	4-26-07	3:15
05	Soil #5	4-26-07	3:20
06	Soil #6	4-26-07	3:25
07	Soil #7	4-26-07	3:30
08	Background	4-26-07	3:35
01	Soil #1A	5-26-07	1700
02	Soil #3A	5-26-07	1703
03	Soil #4A	5-26-07	1710

4.0 SUMMARY OF FINDINGS

Evaluation of the results from the assessment samples and on site inspection on April 26, 2007, indicated that a release had occurred.

Evidence gathered during the site investigation after excavation indicated that:

A. Soil #1

- 1) No Visual or olfactory evidence of petroleum hydrocarbon contamination **was** present.
- 2) No surface water or free product was observed during the investigation.
- 3) TRPH Analysis indicated *elevated* readings for the region.

B. Soil #2

- 1) No Visual or olfactory evidence of petroleum hydrocarbon contamination **was** present.
- 2) No surface water or free product was observed during the investigation.
- 3) TRPH Analysis indicated the normal readings for the region or below OCD regulations.

C. Soil #3

- 1) No visual or olfactory evidence of petroleum hydrocarbon contamination **was** present.
- 2) No surface water or free product was observed during the investigation.

3) TRPH Analysis indicated *elevated* presence of hydrocarbon contamination.

D. Soil #4

1) No Visual or olfactory evidence of petroleum hydrocarbon contamination **was** present.

2) No surface water or free product was observed during the investigation.

3) TRPH Analysis indicated *elevated* readings for the region.

E. Soil #5

1) No visual or olfactory evidence of petroleum hydrocarbon contamination **was** present.

2) No surface water or free product was observed during the investigation.

3) TRPH Analysis indicated normal readings for the region or below OCD regulations.

F. Soil #6

1) No visual or olfactory evidence of petroleum hydrocarbon contamination **was** present.

2) No surface water or free product was observed during the investigation.

3) TRPH Analysis indicated normal readings for the region or below OCD regulations.

G. Soil #7

1) No visual or olfactory evidence of petroleum hydrocarbon contamination **was** present.

2) No surface water or free product was observed during the investigation.

3) TRPH Analysis indicated normal readings for the region or below OCD regulations.

H. Background

1) No visual or olfactory evidence of petroleum hydrocarbon contamination **was** present.

2) No surface water or free product was observed during the investigation.

3) TRPH Analysis indicated normal readings for the region

The analytical results from the samples collected on April 26, 2007 from the excavated area indicated Soil samples number 1, 3, and 4 (refer to site Map) were still elevated or above OCD regulations and further excavation was needed in these areas. Contact was made by WBES employees to Plantation Operating LLC. to request further excavation in these areas. Contact was made to RMA Roustabout Service, Inc and on 5-26-07 these area were over excavated and confirmation samples were collected to verify all contaminated soil has been removed from the site.

Evidence gathered during the site investigation after excavation on 5-26-07 indicated that:

A. Soil #1A

1) No Visual or olfactory evidence of petroleum hydrocarbon contamination **was** present.

2) No surface water or free product was observed during the investigation.

3) TRPH Analysis indicated normal readings for the region or below OCD regulations.

2A ? cw

B. Soil #3A

1) No Visual or olfactory evidence of petroleum hydrocarbon contamination **was** present.

- 2) No surface water or free product was observed during the investigation.
- 3) TRPH Analysis indicated the normal readings for the region or below OCD regulations.

C. Soil #4A

- 1) No visual or olfactory evidence of petroleum hydrocarbon contamination **was** present.
- 2) No surface water or free product was observed during the investigation.
- 3) TRPH Analysis indicated normal readings for the region or below OCD regulations.

5.0 CONCLUSIONS AND RECOMMENDATIONS

White Buffalo Environmental Services, Inc. has performed an Environmental Site Assessment for the Britt A-6#3 Tank Battery Spill remediation, located in Monument, NM using industry standard practices.

A review of the samples *after excavation and removing the material the site indicated* that all of the contaminated soil which could environmentally impact the property was properly removed offsite and disposed of in a local landfill.

In review of the sample results the following information and recommendations are given.

All results are below the immediate .05% required by OCD. All excavated materials were properly removed and disposed of in a local landfill.

No other environmental encumbrances were found on this property during this limited investigation.

White Buffalo Environmental

Chad Gregson
5425 Ben Ficklin Rd.
San Angelo, TX 76904
(325) 651-9054

Bureau of Land Management

Hobbs Field Station
414 West Taylor
Hobbs, New Mexico 88240
(505) 393-3612

Plantation Operating, LLC

John Allred
2203 Timberloch Place, Suite 229
The Woodlands, TX 77380
(281) 296-7222

Oil Conservation Division

1220 South St. Francis Dr.
Santa Fe, NM 87505
(505) 393-6161

APPENDIX A
LABORATORY SAMPLES AND CHAIN OF CUSTODY

ASK Laboratories, Inc.

Analytical Services Kwik!

ASK LABORATORIES, INC.
5935 GLENOAK LANE
AMARILLO, TEXAS 79109

Attn: CUSTOMER SERVICES
Phone: (806) 353-4425

WHITE BUFFALO ENVIRO. SERVICE
5425 BEN FICKLIN ROAD
SAN ANGELO, TX 76904

Attn: GREG SWINDLE

Order #: 07-05-002
Date: 05/10/07 13:06
Work ID: SOIL SAMPLES
Date Received: 05/01/07
Date Completed: 05/10/07

Purchase Order: PLANTATION BRIT AB-3
Invoice Number:

Client Code: WHITE_BUFF

SAMPLE IDENTIFICATION

<u>Sample Number</u>	<u>Sample Description</u>
01	SOIL #1
02	SOIL #2
03	SOIL #3
04	SOIL #4

<u>Sample Number</u>	<u>Sample Description</u>
05	SOIL #5
06	SOIL #6
07	SOIL #7
08	BACKGROUND



Certified By

Alan D. King

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Amarillo, Texas 79109
Telephone (806) 353-4425
Toll Free 1-800-423-9443
Facsimile (806) 352-6454

ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 07-05-002
05/10/07 13:06

ASK LABORATORIES, INC.

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TEST RESULTS BY SAMPLE

Sample: 01A SOIL #1

Collected: 04/26/07 15:00

Test Description	Result	SQL	Units	Analyzed	By
CHLORIDE ON SOLIDS	135	40	mg/kg	05/07/07	BNH
PERCENT SOLIDS DRY WEIGHT	91.06		wt % solids	05/02/07	BJP
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	71.7	29.7	mg/Kg	05/03/07	VRB
TPH C12-C28 - DRO	59.1	29.7	mg/Kg	05/03/07	VRB
TPH C28-C35	<29.7	29.7	mg/Kg	05/03/07	VRB
BTEX					
BENZENE	<0.013	0.013	mg/kg	05/09/07	JRM
TOLUENE	<0.025	0.025	mg/kg	05/09/07	JRM
ETHYLBENZENE	<0.013	0.013	mg/kg	05/09/07	JRM
XYLENE	0.241	0.150	mg/kg	05/09/07	JRM
Surrogates					
BROMOFLUOROBENZENE	117	Min: 80	Max: 120		

Sample: 02A SOIL #2

Collected: 04/26/07 15:05

Test Description	Result	SQL	Units	Analyzed	By
CHLORIDE ON SOLIDS	12.3	8.0	mg/kg	05/07/07	BNH
PERCENT SOLIDS DRY WEIGHT	96.37		wt % solids	05/02/07	BJP
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	<30.2	30.2	mg/Kg	05/03/07	VRB
TPH C12-C28 - DRO	<30.2	30.2	mg/Kg	05/03/07	VRB
TPH C28-C35	<30.2	30.2	mg/Kg	05/03/07	VRB
BTEX					
BENZENE	<0.005	0.005	mg/kg	05/09/07	JRM
TOLUENE	<0.010	0.010	mg/kg	05/09/07	JRM
ETHYLBENZENE	<0.005	0.005	mg/kg	05/09/07	JRM
XYLENE	<0.015	0.015	mg/kg	05/09/07	JRM
Surrogates					
BROMOFLUOROBENZENE	109	Min: 80	Max: 120		

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05/10/07 13:06

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TEST RESULTS BY SAMPLE

Sample: 03A SOIL #3

Collected: 04/26/07 15:10

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
CHLORIDE ON SOLIDS	<8.0	8.0	mg/kg	05/07/07	BNH
PERCENT SOLIDS DRY WEIGHT	90.25		wt % solids	05/02/07	BJP
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	<35.5	35.5	MG/KG	05/03/07	VRB
TPH C12-C28 - DRO	2130	35.5	MG/KG	05/03/07	VRB
TPH C28-C35	2680	35.5	MG/KG	05/03/07	VRB
BTEX					
BENZENE	<0.005	0.005	mg/kg	05/09/07	JRM
TOLUENE	<0.010	0.010	mg/kg	05/09/07	JRM
ETHYLBENZENE	<0.005	0.005	mg/kg	05/09/07	JRM
XYLENE	<0.016	0.016	mg/kg	05/09/07	JRM
Surrogates					
BROMOFLUOROBENZENE	110	Min: 80	Max: 120		

Sample: 04A SOIL #4

Collected: 04/26/07 15:15

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
CHLORIDE ON SOLIDS	18.3	8.0	mg/kg	05/07/07	BNH
PERCENT SOLIDS DRY WEIGHT	87.63		wt % solids	05/02/07	BJP
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	<36.5	36.5	mg/Kg	05/03/07	VRB
TPH C12-C28 - DRO	239	36.5	mg/Kg	05/03/07	VRB
TPH C28-C35	<36.5	36.5	mg/Kg	05/03/07	VRB
BTEX					
BENZENE	<0.005	0.005	mg/kg	05/09/07	JRM
TOLUENE	<0.011	0.011	mg/kg	05/09/07	JRM
ETHYLBENZENE	<0.005	0.005	mg/kg	05/09/07	JRM
XYLENE	<0.016	0.016	mg/kg	05/09/07	JRM
Surrogates					
BROMOFLUOROBENZENE	107	Min: 80	Max: 120		

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05/10/07 13:06

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TEST RESULTS BY SAMPLE

Sample: 05A SOIL #5

Collected: 04/26/07 15:20

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
CHLORIDE ON SOLIDS	<8.0	8.0	mg/kg	05/07/07	BNH
PERCENT SOLIDS DRY WEIGHT	97.93		wt % solids	05/02/07	BJP
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	<31.8	31.8	mg/Kg	05/03/07	VRB
TPH C12-C28 - DRO	<31.8	31.8	mg/Kg	05/03/07	VRB
TPH C28-C35	<31.8	31.8	mg/Kg	05/03/07	VRB
BTEX					
BENZENE	<0.012	0.012	mg/kg	05/09/07	JRM
TOLUENE	<0.024	0.024	mg/kg	05/09/07	JRM
ETHYLBENZENE	<0.012	0.012	mg/kg	05/09/07	JRM
XYLENE	<0.037	0.037	mg/kg	05/09/07	JRM
Surrogates					
BROMOFLUOROBENZENE	108	Min: 80		Max: 120	

Sample: 06A SOIL #6

Collected: 04/26/07 15:25

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
CHLORIDE ON SOLIDS	<8.0	8.0	mg/kg	05/07/07	BNH
PERCENT SOLIDS DRY WEIGHT	97.70		wt % solids	05/02/07	BJP
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	<27.4	27.4	mg/Kg	05/03/07	VRB
TPH C12-C28 - DRO	<27.4	27.4	mg/Kg	05/03/07	VRB
TPH C28-C35	<27.4	27.4	mg/Kg	05/03/07	VRB
BTEX					
BENZENE	<0.010	0.010	mg/kg	05/09/07	JRM
TOLUENE	<0.020	0.020	mg/kg	05/09/07	JRM
ETHYLBENZENE	<0.010	0.010	mg/kg	05/09/07	JRM
XYLENE	<0.030	0.030	mg/kg	05/09/07	JRM
Surrogates					
BROMOFLUOROBENZENE	106	Min: 80		Max: 120	

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05/10/07 13:06

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TEST RESULTS BY SAMPLE

Sample: 07A SOIL #7

Collected: 04/26/07 15:30

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
CHLORIDE ON SOLIDS	13.8	8.0	mg/kg	05/07/07	BNH
PERCENT SOLIDS DRY WEIGHT	97.44		wt % solids	05/02/07	BJP
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	<31.1	31.1	mg/Kg	05/03/07	VRB
TPH C12-C28 - DRO	73.7	31.1	mg/Kg	05/03/07	VRB
TPH C28-C35	<31.1	31.1	mg/Kg	05/03/07	VRB
BTEX					
BENZENE	<0.013	0.013	mg/kg	05/09/07	JRM
TOLUENE	<0.026	0.026	mg/kg	05/09/07	JRM
ETHYLBENZENE	<0.013	0.013	mg/kg	05/09/07	JRM
XYLENE	<0.038	0.038	mg/kg	05/09/07	JRM
Surrogates					
BROMOFLUOROBENZENE	110	Min: 80	Max: 120		

Sample: 08A BACKGROUND

Collected: 04/26/07 15:35

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
CHLORIDE ON SOLIDS	<8.0	8.0	mg/kg	05/07/07	BNH
PERCENT SOLIDS DRY WEIGHT	99.52		wt % solids	05/02/07	BJP
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	<30.4	30.4	mg/Kg	05/03/07	VRB
TPH C12-C28 - DRO	<30.4	30.4	mg/Kg	05/03/07	VRB
TPH C28-C35	<30.4	30.4	mg/Kg	05/03/07	VRB
BTEX					
BENZENE	<0.005	0.005	mg/kg	05/09/07	JRM
TOLUENE	<0.010	0.010	mg/kg	05/09/07	JRM
ETHYLBENZENE	<0.005	0.005	mg/kg	05/09/07	JRM
XYLENE	<0.015	0.015	mg/kg	05/09/07	JRM
Surrogates					
BROMOFLUOROBENZENE	100	Min: 80	Max: 120		

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05/10/07 13:06

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QA/QC INFORMATION

BATCH #V09-50	LCS	MS	MSD	RPD	BLANK
BENZENE	96%	98%	94%	3.8%	bdl
TOLUENE	105%	91%	91%	0.5%	bdl
ETHYLBENZENE	111%	103%	97%	5.5%	bdl
o-XYLENE	111%	99%	92%	7.3%	bdl
m,p-XYLENES	105%	106%	103%	2.4%	bdl

	LCS	MS	MSD	RPD	BLANK
TPH	112%	111%	114%	2.5%	bdl

COMPOUND	RPD	SPIKE RECOVERY	QC RECOVERY	BLANK
CHLORIDE	0.3%	94%	100%	bdl

bdl=below detectable levels

5935 Glenoak Lane
Amarillo, Texas 79109
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05/10/07 13:06

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TEST METHODOLOGIES

TEST CODE : SOLIDS TEST NAME : PERCENT SOLIDS FOR DRY WT CORRECTIONS

REFERENCE CLP PROTOCOL/ SECTION IV/ PART F

TEST CODE : 8015N TEST NAME : TRPH-8015M (GRO, DRO, C28-35)

METHOD 8015M GCFID GAS CHROMATOGRAPHY WITH FLAME-
IONIZATION DETECTOR. SW-846 TEST METHODS FOR
EVALUATING SOLID WASTES.

TEST CODE : BTEX TEST NAME : BTEX

METHOD 8260 GC/MS GAS CHROMATOGRAPHY WITH MASS-
SELECTIVE DETECTOR. SW-846 TEST METHODS FOR
EVALUATING SOLID WASTES.

TEST CODE : CL_SOL TEST NAME : CHLORIDE ON SOLID

METHOD 300.0 : ION CHROMATOGRAPHY
METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES,
EPA-600/4-79-020

5935 Glenoak Lane
Amarillo, Texas 79109
Telephone (806) 353-4425
Toll Free 1-800-423-9443
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ASK Laboratories

Analytical Services Kwik!

5935 Glenoak Lane
 Amarillo, Texas 79109
 Telephone: (806) 353-4425
 Facsimile: (806) 352-6454

Chain of Custody Record

Work Order No. _____
 Client Name White Buffalo Environmental Services
 Project I.D./Location Plantation Brit Ab-3
 Address 5425 Ben Ficklin Road San Angelo, TX 76904
 Telephone 325-651-9054
 Sampled By C. G.

Please note: Liability and Damages. ASK Laboratories liability and clients exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims, including those for negligence and other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories within thirty days of the applicable service. In no event shall ASK Laboratories be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by the client, its subsidiaries, affiliates, or successors arising out of or related to the performance of services rendered by ASK Laboratories, regardless of whether such claims is based upon any of the preceding stated reasons or otherwise.

Sample #	Date	Time	Matrix	Composite	Grab	Sample Description	No. of Containers	Analysis Required	Remarks
01	4/26/07	3:00	Soil		X	Soil 1	1	BTX MTRPH Chloride	
02		3:05				Soil 2	1	X	
03		3:10				Soil 3	1	X	
04		3:15				Soil 4	1	X	
05		3:20				Soil 5	1	X	
06		3:25				Soil 6	1	X	
07		3:30				Soil 7	1	X	
08		3:35				Background	1	X	
09									
10									

Relinquished by: Signature	Date	Time	Received by: Signature
<i>Chad King</i>	4/26/07	5:45	<i>Anthony Kulline</i>
Relinquished by: Signature	Date	Time	Received by: Signature
<i>Anthony Kulline</i>	4/30/07	16:45	<i>BUS</i>
Relinquished by: Signature	Date	Time	Received by: Signature
<i>10/5</i>	5-1	0840	<i>ABK</i>

Headspace	Yes	No
Properly Sealed	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Chilled to 40° F	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Tamper Seal	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IF Yes, Amt. _____
 IF No, Explain was rec 5°C
 Comments Inject

Remarks: _____
 Type of Container: _____
 Additional Comments: _____

Client Agrees to:
 Accept Returned Sample
 Pay for sample Disposal (\$30 per 100 grams)
 Client's Signature _____

Login Checklist

Order # 0705002
0501001

Shipping Method: Bus Date/Time of Receipt: 5-1-07

Cooler Check

Shipping Container	Ice in Cooler			Custody Seal				Tracking Number
	Yes	No	If No,	Present?		Intact?		
			Temperature	Yes	No	Yes	No	
<u>Cover</u>	<u>X</u>		<u>5°C</u>		<u>X</u>			<u>843585</u>

Note: If the temperature of a cooler/sample is above 6°C fill out NCR.

Custody Seals on Bottles Present: Yes X No
If Yes, is it intact? Yes X No
If Not intact, fill out NCR

Condition of Containers:
Loose Caps: Yes No X
If Yes, fill out NCR

Broken Containers: Yes No X
If Yes, fill out NCR

Chain of Custody Included: Yes X No
If Yes, verify receipt of all containers listed and all required fields are complete. Sign and Date COC and fill out laboratory boxes. Document any discrepancies on NCR.

Acid Preserved Samples: pH ≤ 2 Yes NA No
If No, fill out NCR

Base Preserved Samples: pH ≥ 12 Yes Sil No Q
If No, fill out NCR

Coolers Unpacked/Checked by: Adk Date: 5-1-07

NCRs (y/n): N Faxed Confirmation (y/n):

ASK Laboratories, Inc.

Analytical Services Kwik!

**ASK LABORATORIES, INC.
5935 GLENOAK LANE
AMARILLO, TEXAS 79109**

**Attn: CUSTOMER SERVICES
Phone: (806) 353-4425**

WHITE BUFFALO ENVIRO. SERVICE
5425 BEN FICKLIN ROAD
SAN ANGELO, TX 76904

Attn: GREG SWINDLE

Purchase Order: PLANTATION BRIT A-6#3
Invoice Number:

Order #: 07-05-109
Date: 06/06/07 11:22
Work ID: PLANTATION BRIT A-6 #3
Date Received: 05/30/07
Date Completed: 06/05/07

Client Code: WHITE_BUFF

SAMPLE IDENTIFICATION

<u>Sample Number</u>	<u>Sample Description</u>
01	SOIL 1A
02	SOIL 3A

<u>Sample Number</u>	<u>Sample Description</u>
03	SOIL 4A



Certified By
ALAN D. KING

5935 Glenoak Lane
Amarillo, Texas 79109
Telephone (806) 353-4425
Toll Free 1-800-423-9443
Facsimile (806) 352-6454

ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 07-05-109
06/06/07 11:22

ASK LABORATORIES, INC.

Page 2

TEST RESULTS BY SAMPLE

Sample: 01A SOIL 1A

Collected: 05/26/07 17:00

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	96.11		wt % solids	05/30/07	BJP
CHLORIDE ON SOLIDS	62.6	8.0	mg/kg	05/31/07	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<29.7	29.7	mg/kg	05/31/07	BNH
TPH C12-C28 - DRO	<29.7	29.7	mg/kg	05/31/07	BNH
TPH C28-C35	<29.7	29.7	mg/kg	05/31/07	BNH
BTEX					
BENZENE	<0.005	0.005	mg/kg	06/05/07	JRM
TOLUENE	<0.010	0.010	mg/kg	06/05/07	JRM
ETHYLBENZENE	<0.005	0.005	mg/kg	06/05/07	JRM
XYLENE	<0.015	0.015	mg/kg	06/05/07	JRM
Surrogates					
BROMOFLUOROBENZENE	106	Min: 80		Max: 120	

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Order # 07-05-109
06/06/07 11:22

ASK LABORATORIES, INC.

Page 3

TEST RESULTS BY SAMPLE

Sample: 02A SOIL 3A

Collected: 05/26/07 17:03

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	86.90		wt % solids	05/30/07	BJP
CHLORIDE ON SOLIDS	<8.0	8.0	mg/kg	05/31/07	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<33.1	33.1	mg/kg	05/31/07	BNH
TPH C12-C28 - DRO	<33.1	33.1	mg/kg	05/31/07	BNH
TPH C28-C35	<33.1	33.1	mg/kg	05/31/07	BNH
BTEX					
BENZENE	<0.006	0.006	mg/kg	06/05/07	JRM
TOLUENE	<0.011	0.011	mg/kg	06/05/07	JRM
ETHYLBENZENE	<0.006	0.006	mg/kg	06/05/07	JRM
XYLENE	<0.017	0.017	mg/kg	06/05/07	JRM
Surrogates					
BROMOFLUOROBENZENE	93	Min: 80		Max: 120	

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Amarillo, Texas 79109
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Order # 07-05-109
06/06/07 11:22

ASK LABORATORIES, INC.

Page 4

TEST RESULTS BY SAMPLE

Sample: 03A SOIL 4A

Collected: 05/26/07 17:10

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	94.40		wt % solids	05/30/07	BJP
CHLORIDE ON SOLIDS	<8.0	8.0	mg/kg	05/31/07	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<30.6	30.6	mg/kg	05/31/07	BNH
TPH C12-C28 - DRO	<30.6	30.6	mg/kg	05/31/07	BNH
TPH C28-C35	<30.6	30.6	mg/kg	05/31/07	BNH
BTEX					
BENZENE	<0.005	0.005	mg/kg	06/05/07	JRM
TOLUENE	<0.011	0.011	mg/kg	06/05/07	JRM
ETHYLBENZENE	<0.005	0.005	mg/kg	06/05/07	JRM
XYLENE	<0.016	0.016	mg/kg	06/05/07	JRM
Surrogates					
BROMOFLUOROBENZENE	94	Min: 80		Max: 120	

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Amarillo, Texas 79109
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ASK Laboratories, Inc.

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Order # 07-05-109
06/06/07 11:22

ASK LABORATORIES, INC.

Page 5

QA/QC INFORMATION

BATCH #V11-8	LCS	MS	MSD	RPD	BLANK
BENZENE	102%	105%	105%	0.1%	bdl
TOLUENE	101%	92%	98%	6.3%	bdl
ETHYLBENZENE	97%	96%	95%	0.5%	bdl
o-XYLENE	96%	81%	83%	2.6%	bdl
m,p-XYLENES	96%	103%	100%	2.3%	bdl

METHOD 8015	LCS	MS	MSD	RPD	BLANK
TPH	104%	103%	106%	3.1%	bdl

COMPOUND	RPD	SPIKE RECOVERY	QC RECOVERY	BLANK
CHLORIDE	2.5%	112%	104%	bdl

bdl=below detectable levels

TEST METHODOLOGIES

TEST CODE : SOLIDS TEST NAME : PERCENT SOLIDS FOR DRY WT CORRECTIONS

REFERENCE CLP PROTOCOL/ SECTION IV/ PART F

TEST CODE : 8015N TEST NAME : TRPH-8015M (GRO, DRO, C28-35)

METHOD 8015M GCFID GAS CHROMATOGRAPHY WITH FLAME-IONIZATION DETECTOR. SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.

TEST CODE : BTEX TEST NAME : BTEX

METHOD 8260 GC/MS GAS CHROMATOGRAPHY WITH MASS-SELECTIVE DETECTOR. SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.

TEST CODE : CL_SOL TEST NAME : CHLORIDE ON SOLID

METHOD 300.0 : ION CHROMATOGRAPHY
METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES,
EPA-600/4-79-020

5935 Glenoak Lane
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ASK Laboratories

Analytical Services Kwik!

5935 Glenoak Lane
 Amarillo, Texas 79109
 Telephone: (806) 353-4425
 Facsimile: (806) 352-6454

Chain of Custody Record

Work Order No. _____
 Client Name White Buffalo
 Project I.D./Location Plantation Brit A-6 #3
 Address 5425 Ben Ficklin San Angelo TX 76804
 Telephone 325-651-9054
 Sampled By CG

Please note: Liability and Damages. ASK Laboratories liability and clients exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims, including those for negligence and other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories within thirty days of the applicable service. In no event shall ASK Laboratories be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by the client, its subsidiaries, affiliates, or successors arising out of or related to the performance of services rendered by ASK Laboratories, regardless of whether such claims is based upon any of the preceding stated reasons or otherwise.

Sample #	Date	Time	Matrix	Composite	Grab	Sample Description	No. of Containers	Analysis Required			Remarks
								BTX	THP	CHLOR	
01	5-26	1700	Soil		X	Soil 1A	1	X	X	X	
02	(1703	(X	Soil 3A	1	X	X	X	
03	(1710	(X	Soil 4A	1	X	X	X	
04											
05											
06											
07											
08											
09											
10											

Relinquished by: (Signature) <u>Chad Gregson</u>	Date <u>5-26-07</u>	Time <u>1730</u>	Received by: (Signature) <u>(SDA)</u>
Relinquished by: (Signature) <u>(SDA)</u>	Date <u>5-29-07</u>	Time <u>1630</u>	Received by: (Signature) <u>BULLS</u>

Client Agrees to:	Remarks:
Accept Returned Sample	Headspace
Pay for sample Disposal (\$30 per 100 grams)	Properly Sealed
Client's Signature _____	Chilled to 40° F
	Tamper Seal
	Type of Container
	Additional Comments:

Yes	No	If Yes, Amt.
		If No, Explain
		If No, Temp.
		Comments

2.80

3

Login Checklist

Order # 0705109 e 110

Shipping Method: Bus

Date/Time of Receipt: 5/30/07 0900

Cooler Check

Shipping Container	Ice in Cooler			Custody Seal				Tracking Number
	Yes	No	If No, Temperature	Present?		Intact?		
				Yes	No	Yes	No	
<u>Cooler</u>	<u>X</u>		<u>28°C</u>					<u>543589</u>

Note: If the temperature of a cooler/sample is above 6°C fill out NCR.

Custody Seals on Bottles Present:

Yes _____ No X
If Yes, is it intact? Yes _____ No _____
If Not intact, fill out NCR

Condition of Containers:

Loose Caps: Yes _____ No X
If Yes, fill out NCR

Broken Containers: Yes _____ No X
If Yes, fill out NCR

Chain of Custody Included:

Yes X No _____
If Yes, verify receipt of all containers listed and all required fields are complete. Sign and Date COC and fill out laboratory boxes. Document any discrepancies on NCR.

Acid Preserved Samples: pH <= 2

If No, fill out NCR Yes _____ No _____

Base Preserved Samples: pH >= 12

If No, fill out NCR Yes _____ No _____

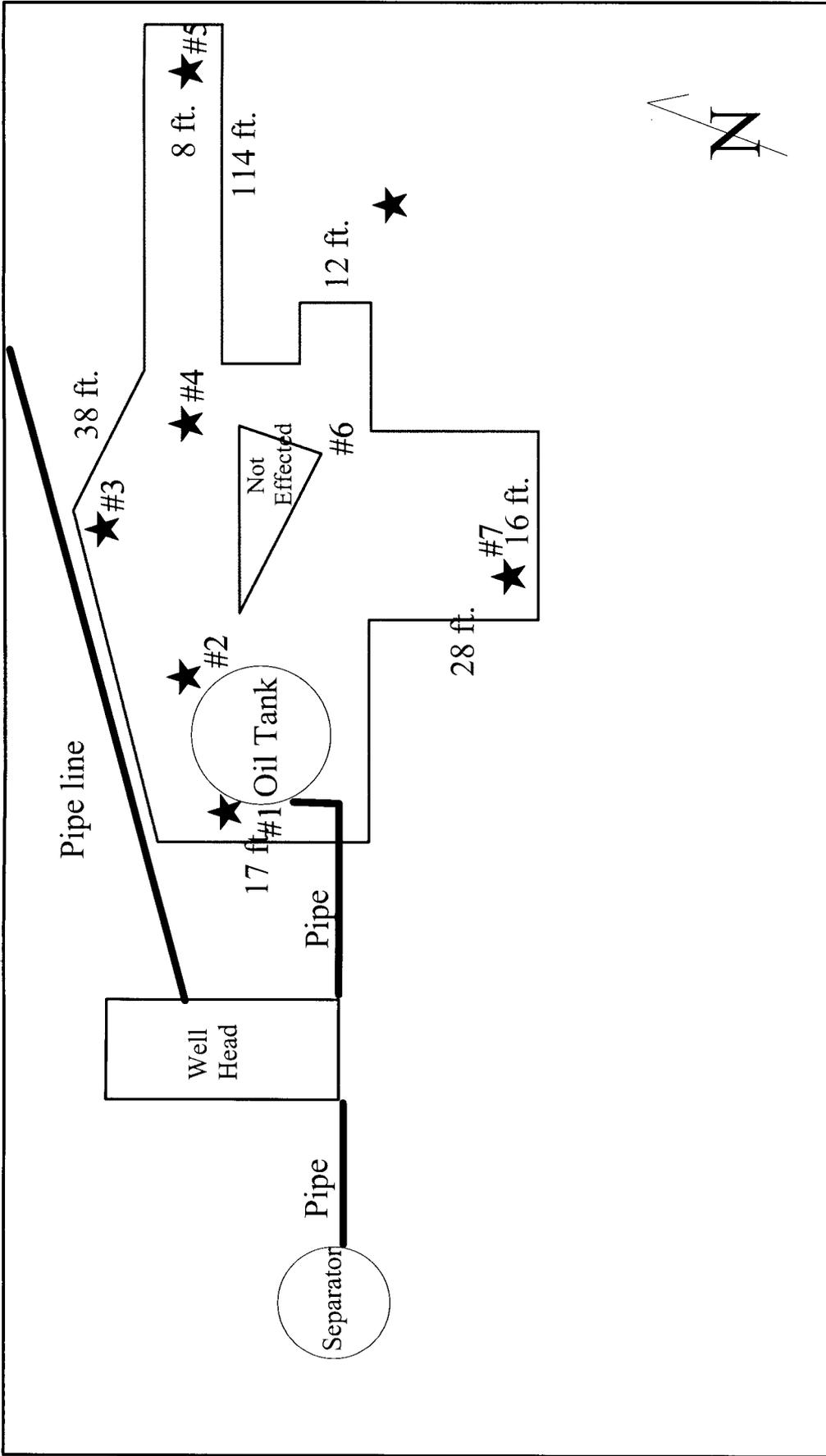
Coolers Unpacked/Checked by: ZLB

Date: 5/30/07

NCRs (y/n): no

Faxed Confirmation (y/n): _____

Appendix B
USGS Map
Sample Map
Aerial Photograph



Sample Map

Britt A-6 #3
 Plantation Operating LLC
 2203 Timberloch Place, Suite 229
 The Woodlands, TX 77380

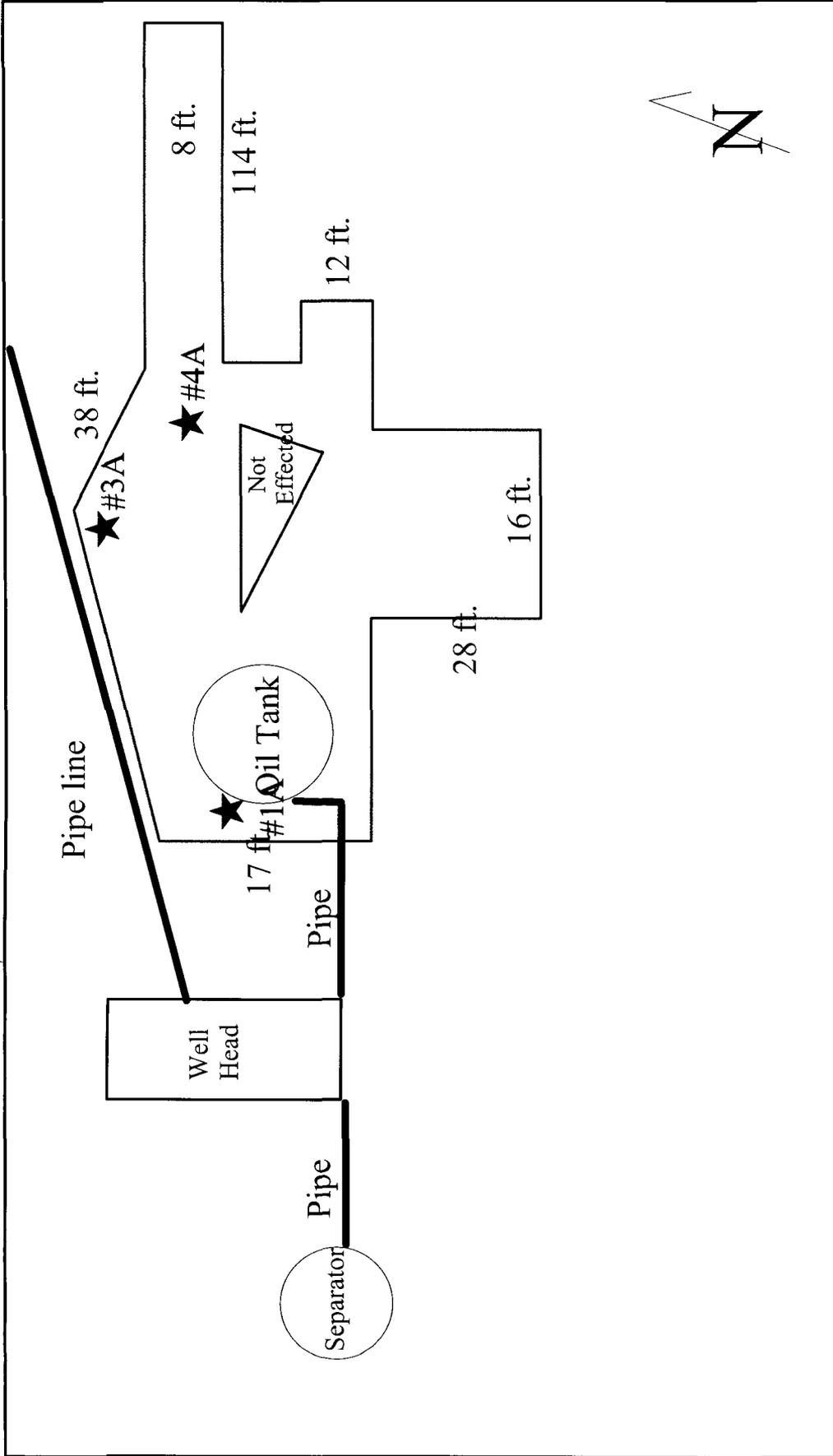
White Buffalo Environmental Services
 5425 Ben Ficklin Rd; San Angelo, TX 76904
 (325) 651-9054 Fax (325) 651-2125

Britt A-6 #3

★ Background

★ = Sample Locations after excavation on 4-26-07

NOT TO SCALE



Sample Map

Britt A-6 #3
 Plantation Operating LLC
 2203 Timberloch Place, Suite 229
 The Woodlands, TX 77380

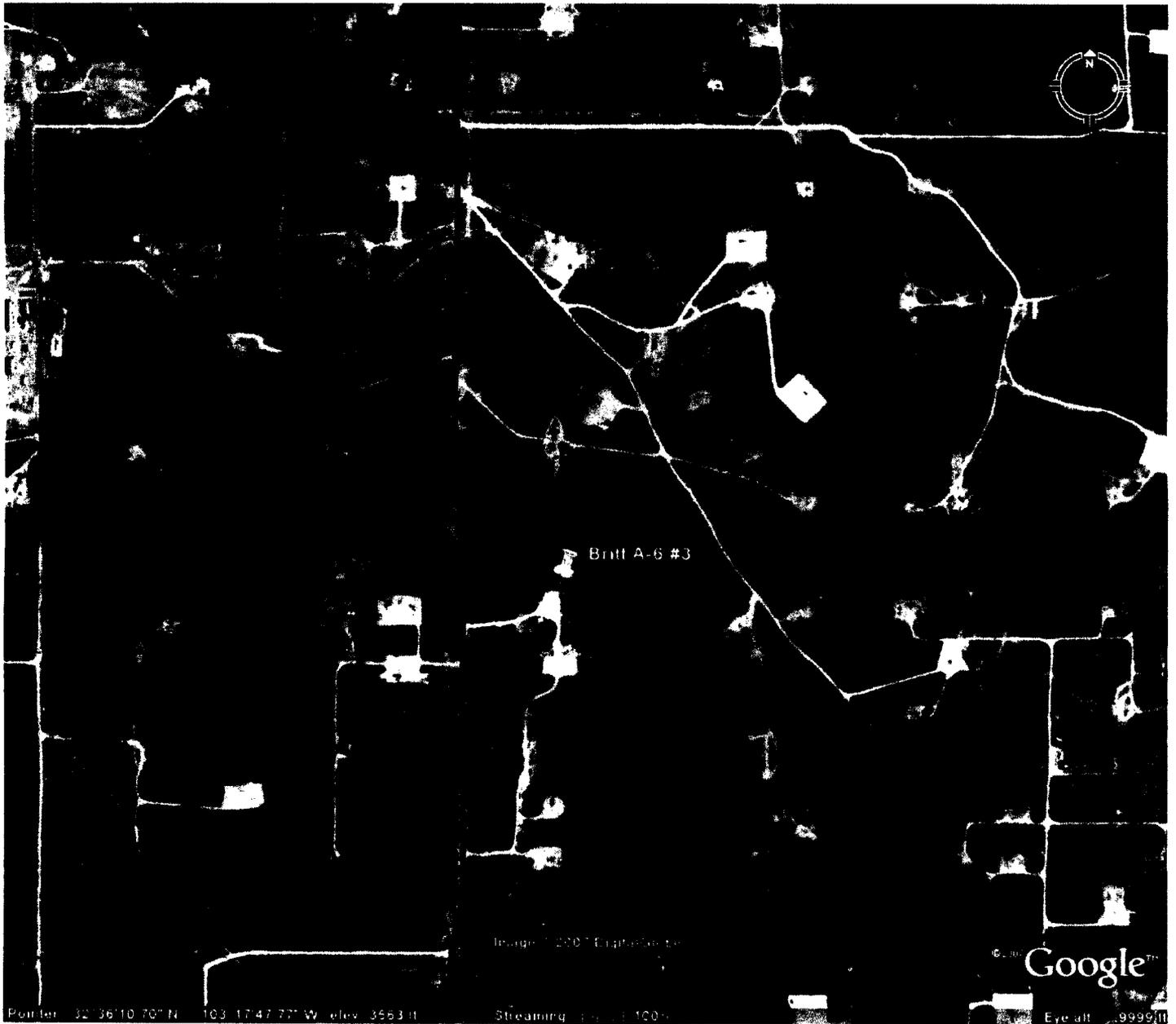
White Buffalo Environmental Services
 5425 Ben Ficklin Rd. San Angelo, TX 76904
 (325) 651-9054 Fax (325) 651-2125

★ Background

NOT TO SCALE

Britt A-6 #3

★ = Sample Locations after excavation on 5-26-07



Britt A-6 #3

Image © 2007 Earthstar Inc.

Google

Porter 32° 36' 10.70" N 103° 17' 47.77" W elev. 3563 ft

Streaming 100%

Eye alt .9999

103° 19.0000' W

103° 18.0000' W

103° 17.0000' W

032° 37.0000' N

032° 37.0000' N

032° 36.0000' N

032° 36.0000' N

032° 35.0000' N

032° 35.0000' N

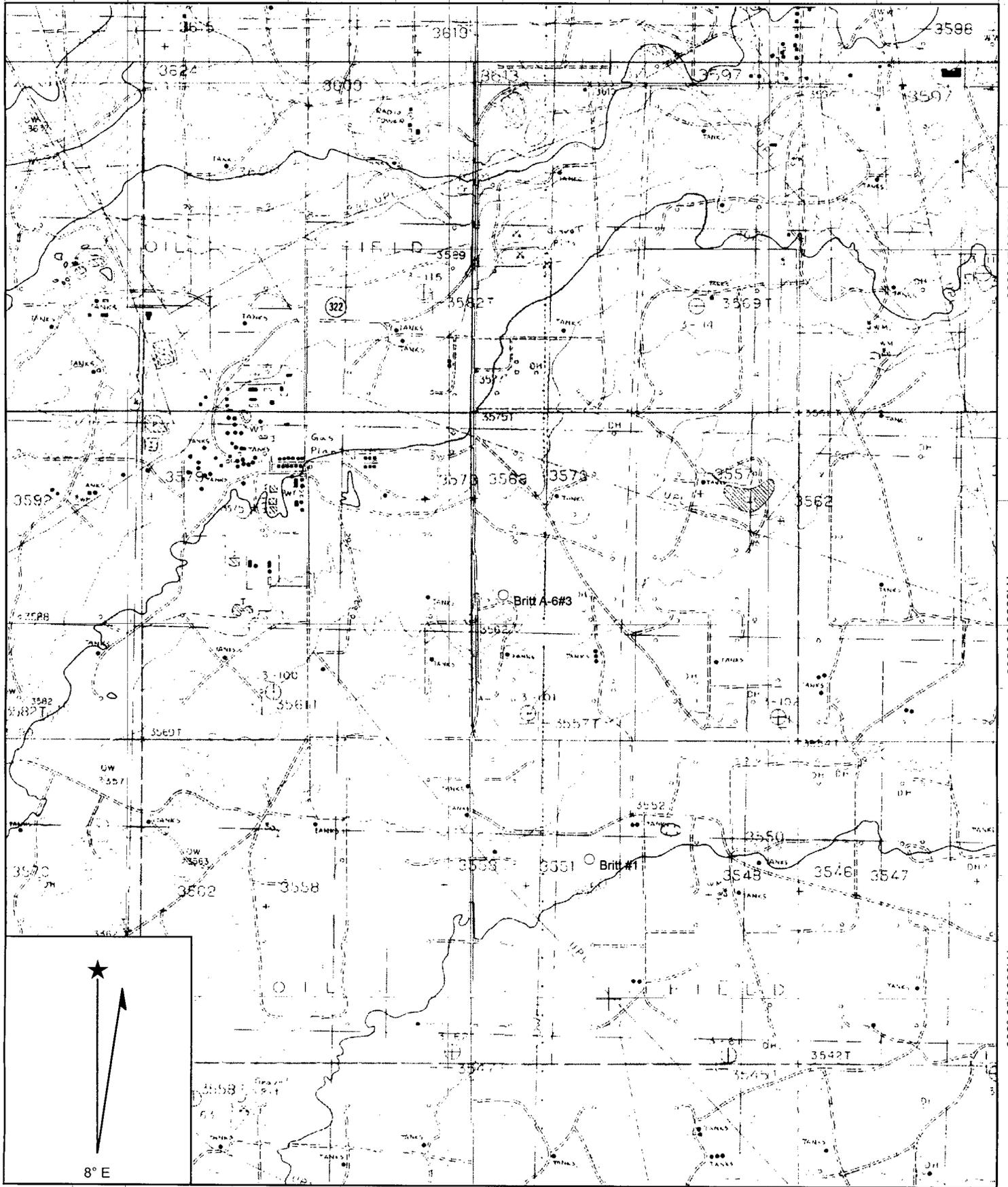
103° 19.0000' W

103° 18.0000' W

103° 17.0000' W

Name: MONUMENT SOUTH
Date: 6/18/2007
Scale: 1 inch equals 2000 feet

Location: 032° 36.0787' N 103° 17.8351' W



**APPENDIX C
NOTIFICATION TO PROPER
AUTHORITIES**

RANGE OPERATING NEW MEXICO, INC

Information and Metrics

Incident Date: 4/23/2007		NMOCD Notified: 4/23/2007 Gary Wink	
Site: Britt A-6 #3		Assigned Site Reference #:	
Company: Plantation Operating, LLC			
Street Address: 2203 Timberloch Place, Suite 229			
Mailing Address: 2203 Timbeloch Place, Suite 229			
City, State, Zip: The Woodlands, TX 77380			
Representative: John Allred			
Representative Telephone: (281) 293-7222			
Fluid volume released (bbls): 60 BBLS		Recovered (bbls): 20 BBLS	
<i>25 bbls: Notify NMOCD verbally within 24 hrs and submit form C-141 within 15 days. (Also applies to unauthorized releases >500 mcf Natural Gas)</i>			
<i>5 – 25 bbls: Submit form C-141 within 15 days</i>			
Leak, Spill, or Pit (LSP) Name: Britt A-6 #3			
Source of contamination: Tank run over-Switch valve			
Land Owner, i.e., BLM, ST, Fee, Other: BLM and leased to Jimmy Cooper			
LSP Dimensions: 50' X 114' north of tank and 8' X 17' on south side of tank			
LSP Area: approximately 650 square feet			
Location of Reference Point (RP): NA			
Location distance and direction from RP: NA			
Latitude: N 32° 36.080'			
Longitude: W 104° 17.824'			
Elevation above mean sea level: 3560' per GPS			
Location- Unit or ¼ ¼: NE/4 of SE/4 of Sec 6		Unit Letter: L	
Location Section: 6			
Location- Township: 20S			
Location Range: 37E			
Surface water body within 1000' radius of site: No 4000 feet per USGS Map per OCD records			
Domestic water wells within 1000' radius of site: No per OCD records			
Agricultural water wells within 1000' radius of site: No per OCD records			
Depth from land surface to ground water (DG): 36' estimated based on OCD records per Chris Williams			
Depth of contamination (DC): 5'			
Depth to ground water (DG – DC = DtGW): 31'			
1. Ground water		2. Wellhead Protection Area	
If Depth to GW <50 feet: 20 points	If <1000' from water source, or <200' from private domestic water source: 20 points	3. Distance to Surface Water Body	
If Depth to GW 50 to 99 feet: 10 points		<200 horizontal feet: 20 points	
If Depth to GW >100 feet: 0 points	If >1000' from water source, or >200' from private domestic water source: 0 points	200-100 horizontal feet: 10 points	
		>1000 horizontal feet: 0 points	
Ground Water Score = 20	Wellhead Protection Area Score = 20	Surface Water Score = 0	
Site Rank (1+2+3) = 40			
Total Site Ranking Score and Acceptable Concentrations			
Parameter	>19	10-19	0-9
Benzene	10 ppm	10 ppm	10 ppm
BTEX	50 ppm	50 ppm	50 ppm
TPH	100 ppm	1,000 ppm	5,000 ppm

Jim Amos
505-234-5909
Carlsbad, NM office
cell 505-361-2648

Bureau of Land Management

Hobbs Field Station

414 West Taylor

Hobbs, New Mexico 88240

Phone: 505-393-3612

Fax: 505-393-4280



Fax Cover Sheet

To: Chad Gregson

Phone: _____ Fax: 325-651-2125

Office: _____

From: Andrea

Phone: _____

Number of pages including cover sheet: 3

Remarks: _____

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised October 10, 2003

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company	Plantation Operating, LLC	Contact	John Allred
Address	2203 Timberloch Place, Suite 229 The Woodlands, TX 77380	Telephone No.	281-296-7222
Facility Name	Britt A-6 #3 API #30-025-05939	Facility Type	210 BBL Test Tank
Surface Owner	BLM	Mineral Owner	BLM
		Lease No.	LC-031621(A)

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
L	6	20S	37E	2310'	South	660'	West	Lea

Latitude _____ Longitude _____

NATURE OF RELEASE

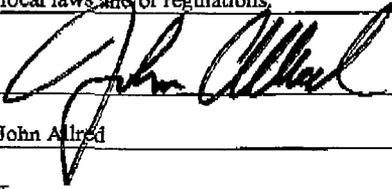
Type of Release	Oil	Volume of Release	60 BBLs	Volume Recovered	20 BBLs
Source of Release	Overflow	Date and Hour of Occurrence	4/23/2007 - 7:00 AM	Date and Hour of Discovery	4/23/2007 - 7:00 AM
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Gary Wink		
By Whom?	John Allred	Date and Hour	4/23/2007 - 9:30 AM		
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	N/A		

If a Watercourse was Impacted, Describe Fully.*
N/A

Describe Cause of Problem and Remedial Action Taken.*
Tank run-over - switch valve.

Describe Area Affected and Cleanup Action Taken.*
Area affected - 650 square feet off pad in pasture. Digging out contaminated dirt and hauling to landfill.

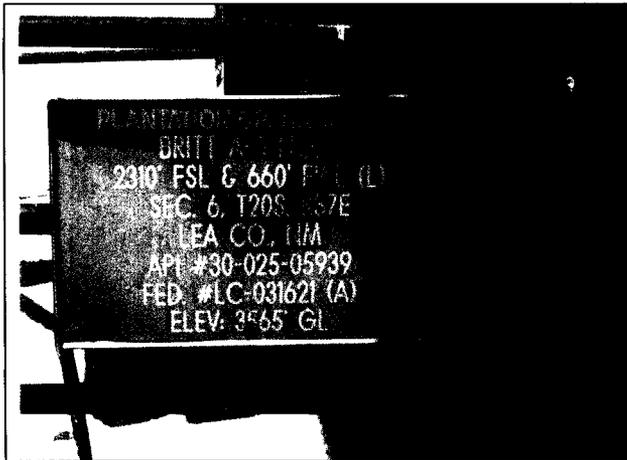
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature:		OIL CONSERVATION DIVISION	
Printed Name:	John Allred	Approved by District Supervisor:	
Title:	Engineer	Approval Date:	6/25/07
E-mail Address:	jallred@plantationpetro.com	Expiration Date:	6/25/07
Date:	4/23/2007	Phonc:	281-296-7222
		Conditions of Approval:	Attached <input type="checkbox"/>

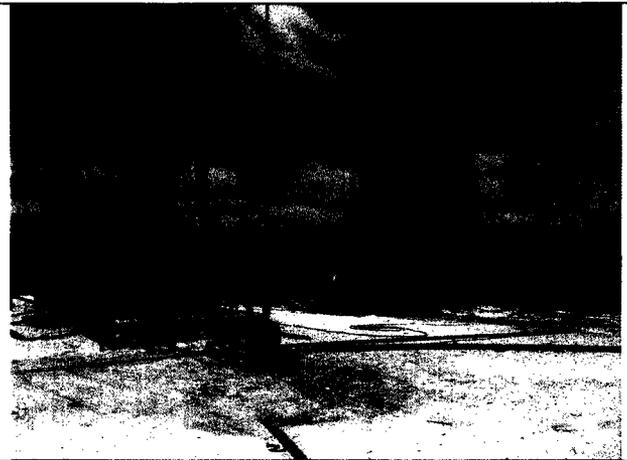
* Attach Additional Sheets If Necessary

**APPENDIX D
PHOTOGRAPHS**

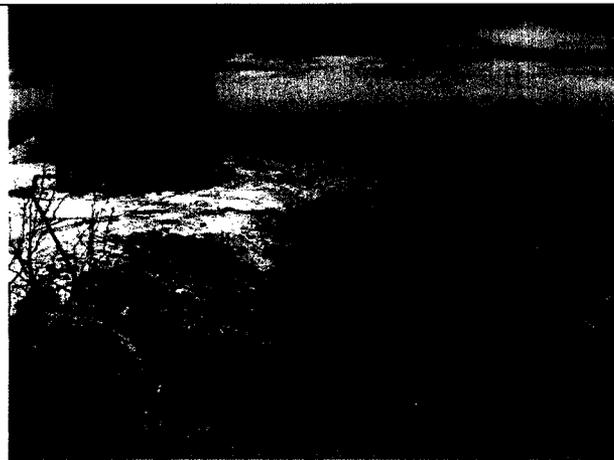
Plantation Operating, LLC
Monument, NM
Britt A-6#3 Spill Cleanup



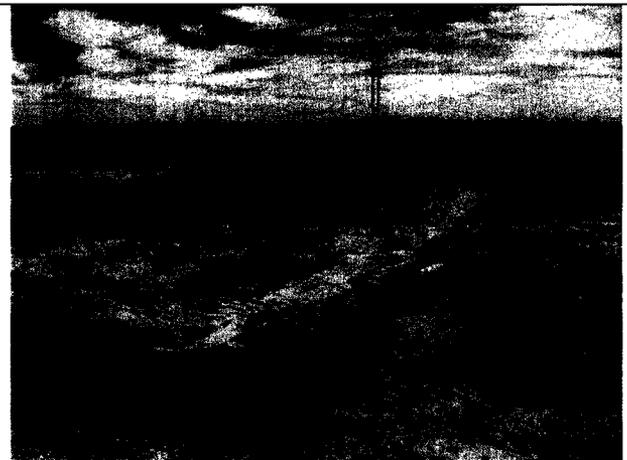
Plantation Operating Britt A-6#3 spill site



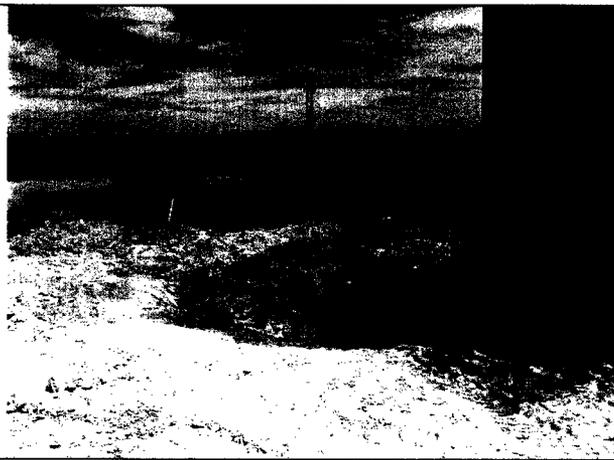
Plantation Operating Britt A-6#3 spill site facing northwest



Plantation Operating Britt A-6#3 spill site facing west



North of tank battery



South side of tank battery on site



West side of tank battery

Plantation Operating, LLC
Monument, NM
Britt A-6#3 Spill Cleanup



Northwest side of tank battery



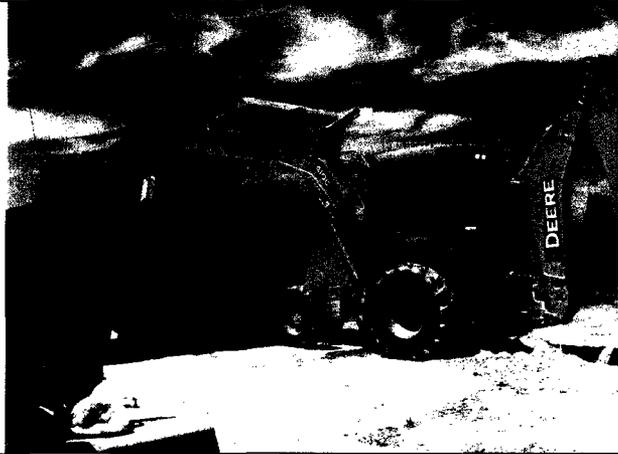
Excavating on south side of tank battery



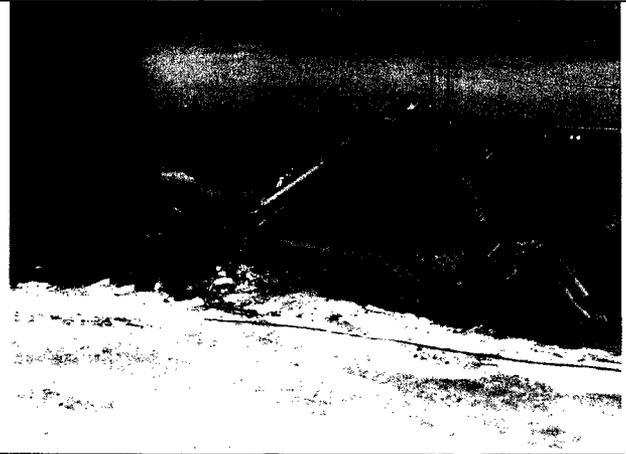
Excavating on south side of tank battery



Excavating on south side of tank battery



Removing excavated soil from site



Excavating northeast side of tank battery

Plantation Operating, LLC
Monument, NM
Britt A-6#3 Spill Cleanup



Excavating northeast side of tank battery



Excavating northeast side of tank battery



Area around tank battery after excavating



Excavated materials to be removed from site

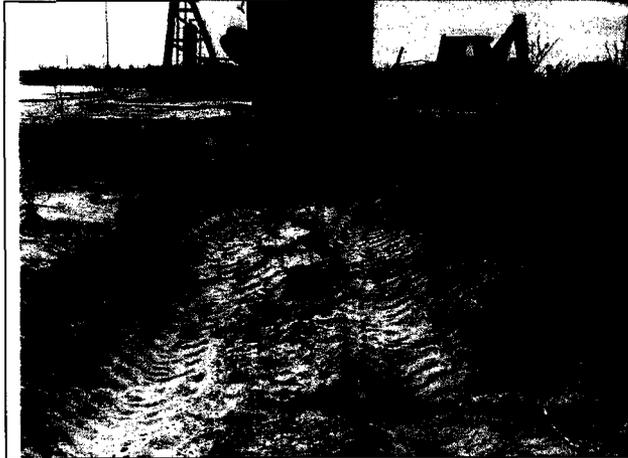


North side of tank battery spill extended approximately 114 feet from tank



Northwest side of battery after excavating

Plantation Operating, LLC
Monument, NM
Britt A-6#3 Spill Cleanup



North side of battery after excavating



North side of battery after excavating facing north



Excavated approximately 4 feet in spill areas



West side of tank after excavating



Additional excavation conducted on 5-26-07 after tank was removed to reach elevated areas from the spill



Additional excavation conducted on 5-26-07 after tank was removed to reach elevated areas from the spill

Plantation Operating, LLC
Monument, NM
Britt A-6#3 Spill Cleanup



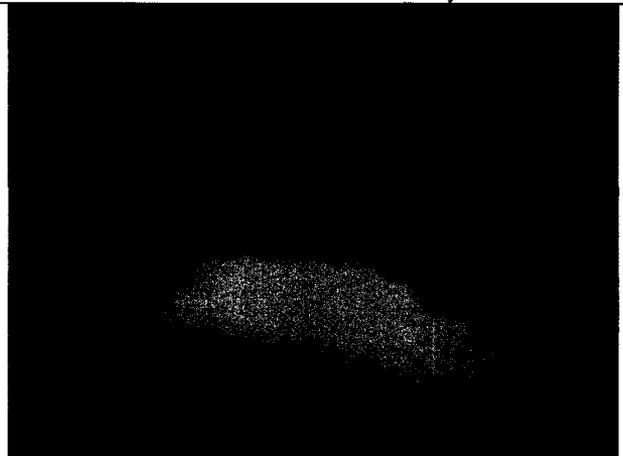
Additional excavation conducted on 5-26-07
northwest of tank battery



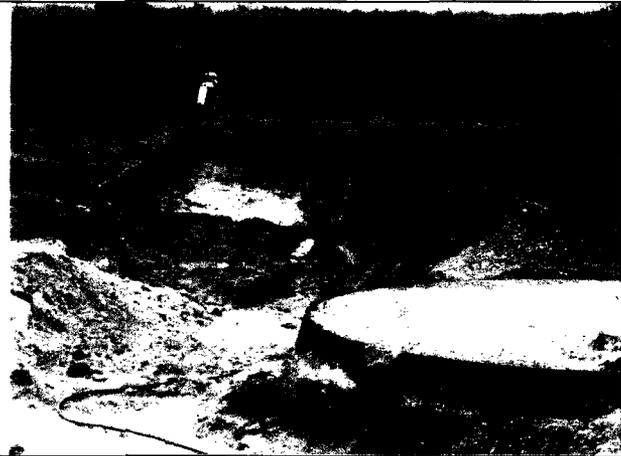
Additional excavation conducted on 5-26-07
northwest of tank battery



Additional excavation conducted on 5-26-07
northwest of tank battery



Additional excavation conducted on 5-26-07
northwest of tank battery



Additional excavation conducted on 5-26-07
northwest of tank battery

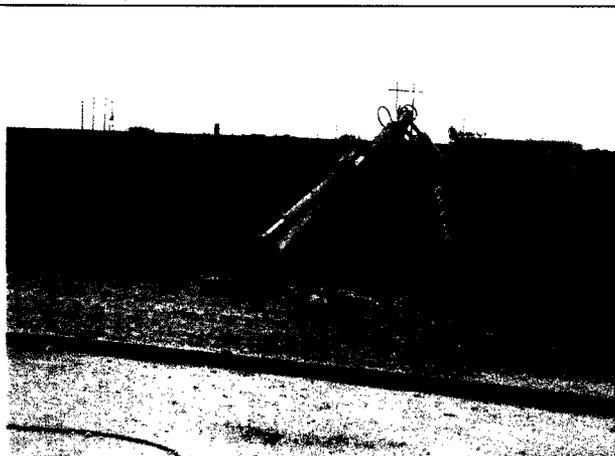


Additional excavation conducted on 5-26-07

Plantation Operating, LLC
Monument, NM
Britt A-6#3 Spill Cleanup



Additional excavation conducted on 5-26-07



Additional excavation conducted on 5-26-07



Additional excavation conducted on 5-26-07



Additional excavation conducted on 5-26-07



Additional excavation conducted on 5-26-07



Additional excavation conducted on 5-26-07

Plantation Operating, LLC
Monument, NM
Britt A-6#3 Spill Cleanup



Area where tank sat after additional excavation on 5-26-07



Area where tank sat after additional excavation on 5-26-07



Area where tank sat after additional excavation on 5-26-07



Area where tank sat after additional excavation on 5-26-07