

NM1 - ____ 10 B ____

APPROVALS

Reuse

YEAR(S):

____ 2008 ____



New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor

Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



October 2, 2008

Ms. Marcella Marquez
JFJ Landfarm, L.L.C.
Industrial Ecosystems Inc.
Soil Reclamation Center
P.O. Box 2043
Farmington, New Mexico 87499

RE: Request for Approval to Reuse Remediated Biopile Soils for the Stabilization/Solidification of Drilling Mud and Tank Bottoms and Sludge
JFJ Landfarm, LLC - Industrial Ecosystems Inc.
JFJ Landfarm - Permit # NM01-0010B
NW/4, SE/4, Section 2, Township 29 North, Range 12 West, NMPM,
San Juan County, New Mexico

Dear Ms. Marquez:

The New Mexico Oil Conservation Division (OCD) has reviewed JFJ Landfarm, LLC's (JFJ) supplemental email request, dated September 29, 2008, and analytical results to reuse the remediated soils in the following biopile for the stabilization and/or solidification of incoming drilling mud and tank bottoms and sludge: Conoco # 643

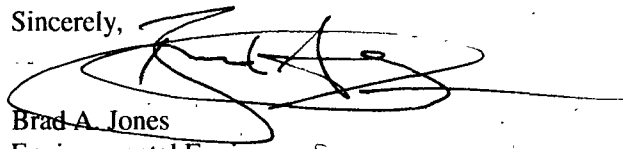
Based upon the information provided, the above-referenced biopile is hereby approved for the stabilization and/or solidification of incoming drilling mud and tank bottoms and sludge.

OCD still anticipates the submittal of the proposal, analytical results, and confirmation from the pipeline operators to address the accumulation of soils within the facility boundary, as identified in the August 6, 2008 written response. OCD wishes to remind JFJ that OCD approval is required for and prior to the release and reuse of any remediated soils on or off the facility property.

Please be advised that approval of this request does not relieve the JFJ of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve JFJ of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,



Brad A. Jones
Environmental Engineer

BAJ/baj
cc: OCD District III Office, Aztec





**Industrial Ecosystems Inc.
Soil Reclamation Center**

RECEIVED
2008 OCT 1 PM 2 46

P.O. Box 2043
Farmington, NM 87499

Phone: (505) 632-1782
Fax: (505) 632-1876

#49 CR 3150
Aztec, NM 87410

September 29, 2008

Brad A. Jones
Environmental Engineer
Environmental Bureau
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

RE: Use of reclaimed soil

Dear Brad:

Recent analytical results show the following biopiles(s) have reached acceptable levels as required by the NMOCD:

- Conoco # 643

We are seeking your approval to recycle this soil by using it to mix/solidify incoming liquid waste.

Please contact me at the above listed number with any questions or concerns with this request.

Sincerely,

Marcella Marquez
Administrative Officer

Enclosure (Analytical Report)

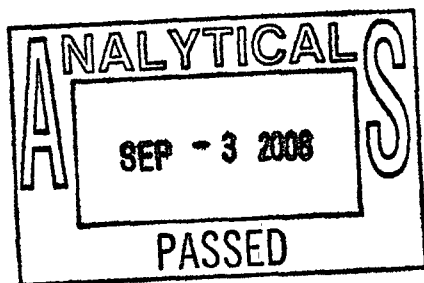
Hall Environmental Analysis Laboratory, Inc.

Date: 17-Sep-08

CLIENT: Industrial Ecosystems, Inc.
Lab Order: 0809036
Project: JFJ Land Farm
Lab ID: 0809036-09

Client Sample ID: Conoco #643
Collection Date: 9/2/2008 11:00:00 AM
Date Received: 9/3/2008
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	9/6/2008
Motor Oil Range Organics (MRO)	ND	50		mg/Kg	1	9/6/2008
Surr: DNOP	101	61.7-135		%REC	1	9/6/2008
EPA METHOD 8015B: GASOLINE RANGE						Analyst: DAM
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	9/13/2008 3:22:49 AM
Surr: BFB	81.9	58.8-123		%REC	1	9/13/2008 3:22:49 AM
EPA METHOD 300.0: ANIONS						Analyst: SLB
Chloride	26	0.30		mg/Kg	1	9/11/2008 4:08:00 AM



Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit



New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor

Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



August 18, 2008

Ms. Marcella Marquez
JFJ Landfarm, L.L.C.
Industrial Ecosystems Inc.
Soil Reclamation Center
P.O. Box 2043
Farmington, New Mexico 87499

**RE: Request for Approval to Reuse Remediated Biopile Soils for the
Stabilization/Solidification of Drilling Mud and Tank Bottoms and Sludge
JFJ Landfarm, LLC - Industrial Ecosystems Inc.
JFJ Landfarm – Permit # NM01-0010B
NW/4, SE/4, Section 2, Township 29 North, Range 12 West, NMPM,
San Juan County, New Mexico**

Dear Ms. Marquez:

The New Mexico Oil Conservation Division (OCD) has reviewed JFJ Landfarm, LLC's (JFJ) supplemental email request, dated August 8, 2008, and the additional chloride analytical results to reuse the remediated soils in the following biopiles for the stabilization and/or solidification of incoming drilling mud and tank bottoms and sludge:

Pile # 42 Delta	Pile # 312 Energen
Pile # 101 Basin	Pile # 585 Community Pit
Pile # 104 Red Cedar	Pile # 597 Burlington
Pile # 105 Graves	Pile # 641 Community

Based upon the information provided, the above-referenced biopiles are hereby approved for the addition of another lift of contaminated soils.

OCD appreciates JFJ's written response, dated August 6, 2008, that addressed concerns OCD expressed in our last lift approval letter, dated July 16, 2008. OCD wishes to remind JFJ that OCD approval is required for and prior to the release and reuse of any remediated soils on or off the facility property.

Please be advised that approval of this request does not relieve the JFJ of liability should operations result in pollution of surface water, ground water or the environment. Nor does

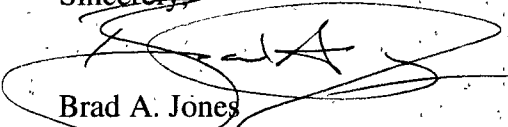


Ms. Marquez
Permit NM1-0010B
August 18, 2008
Page 2 of 2

approval relieve JFJ of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,



Brad A. Jones
Environmental Engineer

BAJ/baj

cc: OCD District III Office, Aztec



**Industrial Ecosystems Inc.
Soil Reclamation Center**

P.O. Box 2043
Farmington, NM 87499

Phone: (505) 632-1782
Fax: (505) 632-1876

#49 CR 3150
Aztec, NM 87410

August 8, 2008

Brad A. Jones
Environmental Engineer
Environmental Bureau
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

RE: Use of reclaimed soil

Dear Brad:

Recent analytical results show that the following biopiles(s) have reached acceptable levels as required by the N.M.O.C.D.

- Pile # 42 Delta
- Pile # 101 Basin
- Pile # 104 Red Cedar
- Pile # 105 Graves
- Pile # 312 Energen
- Pile # 585 Community Pit
- Pile # 597 Burlington
- Pile # 641 Community

We are seeking your approval to recycle this soil by using it to mix/solidify incoming liquid waste.

Sincerely,

Marcella Marquez
Administrative Officer

Enclosure(s) – Analytical Reports

RECEIVED
2008 AUG 12 PM 2 37

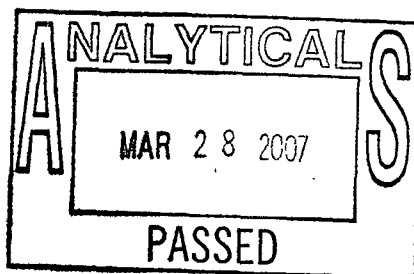
Hall Environmental Analysis Laboratory, Inc.

Date: 28-Mar-07

CLIENT: Industrial Ecosystems, Inc.
Lab Order: 0703336
Project: JFJ Land Farm
Lab ID: 0703336-04

Client Sample ID: Delta 42
Collection Date: 3/21/2007 9:55:00 AM
Date Received: 3/22/2007
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC
Diesel Range Organics (DRO)	14	10		mg/Kg	1	3/26/2007 8:31:28 PM
Motor Oil Range Organics (MRO)	58	50		mg/Kg	1	3/26/2007 8:31:28 PM
Surr: DNOP	89.2	61.7-135		%REC	1	3/26/2007 8:31:28 PM
EPA METHOD 8015B: GASOLINE RANGE						Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	3/26/2007 1:14:09 PM
Surr: BFB	112	84-138		%REC	1	3/26/2007 1:14:09 PM
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	3/26/2007 1:14:09 PM
Benzene	ND	0.050		mg/Kg	1	3/26/2007 1:14:09 PM
Toluene	ND	0.050		mg/Kg	1	3/26/2007 1:14:09 PM
Ethylbenzene	ND	0.050		mg/Kg	1	3/26/2007 1:14:09 PM
Xylenes, Total	ND	0.10		mg/Kg	1	3/26/2007 1:14:09 PM
Surr: 4-Bromofluorobenzene	90.3	68.2-109		%REC	1	3/26/2007 1:14:09 PM



Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Date: 30-Jul-08

CLIENT: Industrial Ecosystems, Inc.**Client Sample ID:** Delta #42**Lab Order:** 0807323**Collection Date:** 7/22/2008 10:30:00 AM**Project:** JFJ Land Farm**Date Received:** 7/24/2008**Lab ID:** 0807323-02**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	610	3.0		mg/Kg	10	Analyst: IC 7/29/2008 6:30:53 PM

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Date: 22-Feb-07

CLIENT: Industrial Ecosystems, Inc.

Client Sample ID: Basin 101

Lab Order: 0702228

Collection Date: 2/20/2007 8:46:00 AM

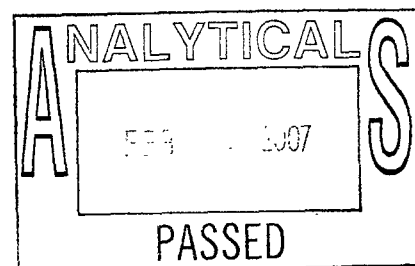
Project: JFJ Land Farm

Date Received: 2/21/2007

Lab ID: 0702228-06

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	2/21/2007 7:26:29 PM
Motor Oil Range Organics (MRO)	ND	50		mg/Kg	1	2/21/2007 7:26:29 PM
Surr: DNOP	94.7	61.7-135		%REC	1	2/21/2007 7:26:29 PM
EPA METHOD 8015B: GASOLINE RANGE						Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	2/21/2007 9:31:53 PM
Surr: BFB	107	84-138		%REC	1	2/21/2007 9:31:53 PM
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	2/21/2007 9:31:53 PM
Benzene	ND	0.050		mg/Kg	1	2/21/2007 9:31:53 PM
Toluene	ND	0.050		mg/Kg	1	2/21/2007 9:31:53 PM
Ethylbenzene	ND	0.050		mg/Kg	1	2/21/2007 9:31:53 PM
Xylenes, Total	ND	0.10		mg/Kg	1	2/21/2007 9:31:53 PM
Surr: 4-Bromofluorobenzene	90.0	68.2-109		%REC	1	2/21/2007 9:31:53 PM



Qualifiers: * Value exceeds Maximum Contaminant Level

E Value above quantitation range

J Analyte detected below quantitation limits

ND Not Detected at the Reporting Limit

S Spike recovery outside accepted recovery limits

B Analyte detected in the associated Method Blank

H Holding times for preparation or analysis exceeded

MCL Maximum Contaminant Level

RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Date: 05-Aug-08

CLIENT: Industrial Ecosystems, Inc.
Project: JFJ Land Farm

Lab Order: 0807324

Lab ID: 0807324-01
Client Sample ID: Graves #105

Collection Date: 7/22/2008 1:45:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	210	3.0		mg/Kg	10	Analyst: SLB 7/30/2008 10:39:06 PM

Lab ID: 0807324-02
Client Sample ID: Basin #101

Collection Date: 7/22/2008 2:05:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	710	3.0		mg/Kg	10	Analyst: SLB 7/30/2008 10:56:30 PM

Lab ID: 0807324-03
Client Sample ID: Red Cedar #104

Collection Date: 7/22/2008 2:20:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	600	3.0		mg/Kg	10	Analyst: SLB 7/30/2008 11:13:54 PM

Lab ID: 0807324-04
Client Sample ID: Community pit #585

Collection Date: 7/22/2008 2:45:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	580	3.0		mg/Kg	10	Analyst: SLB 7/30/2008 11:31:18 PM

Lab ID: 0807324-05
Client Sample ID: Burlington #597

Collection Date: 7/22/2008 2:53:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	150	3.0		mg/Kg	10	Analyst: SLB 7/30/2008 11:48:43 PM

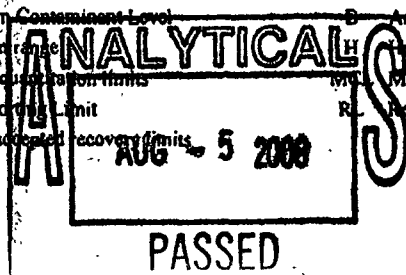
Lab ID: 0807324-06
Client Sample ID: Graves #105B

Collection Date: 7/22/2008
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	340	3.0		mg/Kg	10	Analyst: SLB 7/31/2008 12:06:07 AM

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ML Maximum Contaminant Level
- RL Reporting Limit



Hall Environmental Analysis Laboratory, Inc.

Date: 30-Apr-07

CLIENT: Industrial Ecosystems, Inc.

Client Sample ID: Red Cedar #104

Lab Order: 0704405

Collection Date: 4/25/2007 12:04:00 PM

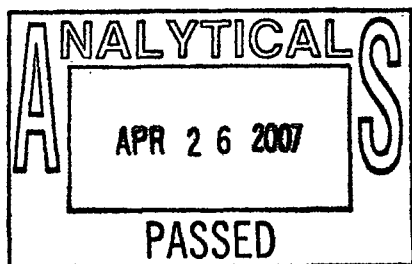
Project: JFJ Land Farm

Date Received: 4/26/2007

Lab ID: 0704405-16

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC
Diesel Range Organics (DRO)	18	10		mg/Kg	1	4/28/2007 10:13:39 PM
Motor Oil Range Organics (MRO)	71	50		mg/Kg	1	4/28/2007 10:13:39 PM
Surr: DNOP	103	61.7-135		%REC	1	4/28/2007 10:13:39 PM
EPA METHOD 8015B: GASOLINE RANGE						Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	4/27/2007 9:04:26 PM
Surr: BFB	113	84-138		%REC	1	4/27/2007 9:04:26 PM
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	4/27/2007 9:04:26 PM
Benzene	ND	0.050		mg/Kg	1	4/27/2007 9:04:26 PM
Toluene	ND	0.050		mg/Kg	1	4/27/2007 9:04:26 PM
Ethylbenzene	ND	0.050		mg/Kg	1	4/27/2007 9:04:26 PM
Xylenes, Total	ND	0.10		mg/Kg	1	4/27/2007 9:04:26 PM
Surr: 4-Bromofluorobenzene	89.1	68.2-109		%REC	1	4/27/2007 9:04:26 PM



Qualifiers: * Value exceeds Maximum Contaminant Level
E Value above quantitation range
J Analyte detected below quantitation limits
ND Not Detected at the Reporting Limit
S Spike recovery outside accepted recovery limits

B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
MCL Maximum Contaminant Level
RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Date: 05-Aug-08

CLIENT: Industrial Ecosystems, Inc.
Project: JFJ Land Farm

Lab Order: 0807324

Lab ID: 0807324-01
Client Sample ID: Graves #105

Collection Date: 7/22/2008 1:45:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	210	3.0		mg/Kg	10	Analyst: SLB 7/30/2008 10:39:05 PM

Lab ID: 0807324-02
Client Sample ID: Basin #101

Collection Date: 7/22/2008 2:05:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	710	3.0		mg/Kg	10	Analyst: SLB 7/30/2008 10:56:30 PM

Lab ID: 0807324-03
Client Sample ID: Red Cedar #104

Collection Date: 7/22/2008 2:20:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	600	3.0		mg/Kg	10	Analyst: SLB 7/30/2008 11:13:54 PM

Lab ID: 0807324-04
Client Sample ID: Community pit #585

Collection Date: 7/22/2008 2:45:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	590	3.0		mg/Kg	10	Analyst: SLB 7/30/2008 11:31:18 PM

Lab ID: 0807324-05
Client Sample ID: Burlington #597

Collection Date: 7/22/2008 2:53:00 PM
Matrix: SOIL

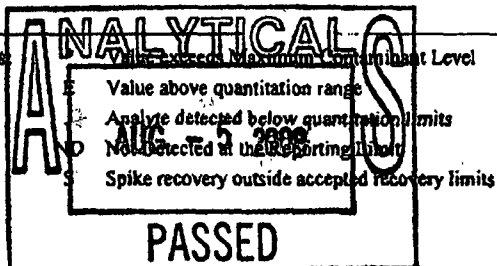
Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	150	3.0		mg/Kg	10	Analyst: SLB 7/30/2008 11:48:43 PM

Lab ID: 0807324-06
Client Sample ID: Graves #105B

Collection Date: 7/22/2008
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	340	3.0		mg/Kg	10	Analyst: SLB 7/31/2008 12:06:07 AM

Qualifiers



B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
MCL Maximum Contaminant Level
RL Reporting Limit

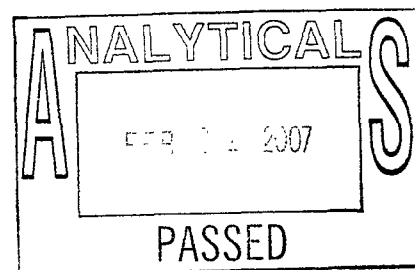
Hall Environmental Analysis Laboratory, Inc.

Date: 22-Feb-07

CLIENT: Industrial Ecosystems, Inc.
Lab Order: 0702228
Project: JFJ Land Farm
Lab ID: 0702228-07

Client Sample ID: Graves 105
Collection Date: 2/20/2007 9:00:00 AM
Date Received: 2/21/2007
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	2/21/2007 8:00:38 PM
Motor Oil Range Organics (MRO)	ND	50		mg/Kg	1	2/21/2007 8:00:38 PM
Surr: DNOP	86.1	61.7-135		%REC	1	2/21/2007 8:00:38 PM
EPA METHOD 8015B: GASOLINE RANGE						Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	2/21/2007 10:01:55 PM
Surr: BFB	107	84-138		%REC	1	2/21/2007 10:01:55 PM
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	2/21/2007 10:01:55 PM
Benzene	ND	0.050		mg/Kg	1	2/21/2007 10:01:55 PM
Toluene	ND	0.050		mg/Kg	1	2/21/2007 10:01:55 PM
Ethylbenzene	ND	0.050		mg/Kg	1	2/21/2007 10:01:55 PM
Xylenes, Total	ND	0.10		mg/Kg	1	2/21/2007 10:01:55 PM
Surr: 4-Bromofluorobenzene	90.6	68.2-109		%REC	1	2/21/2007 10:01:55 PM



Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Date: 05-Aug-08

CLIENT: Industrial Ecosystems, Inc.
Project: IFJ Land Farm

Lab Order: 0807324

Lab ID: 0807324-01
Client Sample ID: Graves #105

Collection Date: 7/22/2008 1:45:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	210	3.0		mg/Kg	10	Analyst: SLB 7/30/2008 10:39:05 PM

Lab ID: 0807324-02
Client Sample ID: Basin #101

Collection Date: 7/22/2008 2:05:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	710	3.0		mg/Kg	10	Analyst: SLB 7/30/2008 10:56:30 PM

Lab ID: 0807324-03
Client Sample ID: Red Cedar #104

Collection Date: 7/22/2008 2:20:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	600	3.0		mg/Kg	10	Analyst: SLB 7/30/2008 11:13:54 PM

Lab ID: 0807324-04
Client Sample ID: Community pit #585

Collection Date: 7/22/2008 2:45:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	580	3.0		mg/Kg	10	Analyst: SLB 7/30/2008 11:31:18 PM

Lab ID: 0807324-05
Client Sample ID: Burlington #597

Collection Date: 7/22/2008 2:53:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	150	3.0		mg/Kg	10	Analyst: SLB 7/30/2008 11:48:43 PM

Lab ID: 0807324-06
Client Sample ID: Graves #105B

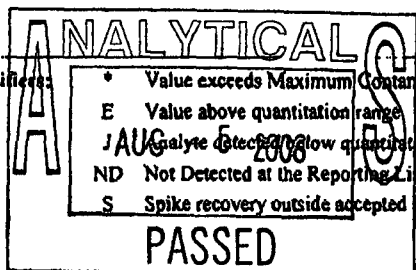
Collection Date: 7/22/2008
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	340	3.0		mg/Kg	10	Analyst: SLB 7/31/2008 12:06:07 AM

Qualifiers:

* Value exceeds Maximum Contaminant Level
 E Value above quantitation range
 J Analyte detected below quantitation limits
 ND Not Detected at the Reporting Limit
 S Spike recovery outside accepted recovery limits

B Analyte detected in the associated Method Blank
 H Holding times for preparation or analysis exceeded
 MCL Maximum Contaminant Level
 RL Reporting Limit



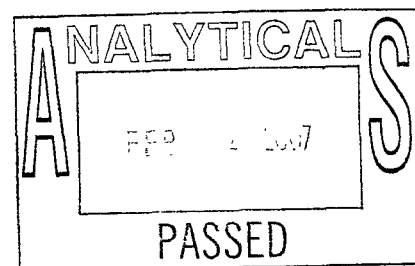
Hall Environmental Analysis Laboratory, Inc.

Date: 22-Feb-07

CLIENT: Industrial Ecosystems, Inc.
Lab Order: 0702228
Project: JFJ Land Farm
Lab ID: 0702228-09

Client Sample ID: Energen 312
Collection Date: 2/20/2007 9:30:00 AM
Date Received: 2/21/2007
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	2/21/2007 9:42:56 PM
Motor Oil Range Organics (MRO)	ND	50		mg/Kg	1	2/21/2007 9:42:56 PM
Surr: DNOP	93.0	61.7-135		%REC	1	2/21/2007 9:42:56 PM
EPA METHOD 8015B: GASOLINE RANGE						Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	2/22/2007 1:02:14 AM
Surr: BFB	107	84-138		%REC	1	2/22/2007 1:02:14 AM
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	2/22/2007 1:02:14 AM
Benzene	ND	0.050		mg/Kg	1	2/22/2007 1:02:14 AM
Toluene	ND	0.050		mg/Kg	1	2/22/2007 1:02:14 AM
Ethylbenzene	ND	0.050		mg/Kg	1	2/22/2007 1:02:14 AM
Xylenes, Total	ND	0.10		mg/Kg	1	2/22/2007 1:02:14 AM
Surr: 4-Bromofluorobenzene	90.2	68.2-109		%REC	1	2/22/2007 1:02:14 AM



Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Date: 30-Jul-08

CLIENT: Industrial Ecosystems, Inc.**Client Sample ID:** Energen #312**Lab Order:** 0807323**Collection Date:** 7/22/2008 11:00:00 AM**Project:** JFJ Land Farm**Date Received:** 7/24/2008**Lab ID:** 0807323-04**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						Analyst: IC
Chloride	460	3.0		mg/Kg	10	7/29/2008 7:40:32 PM

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

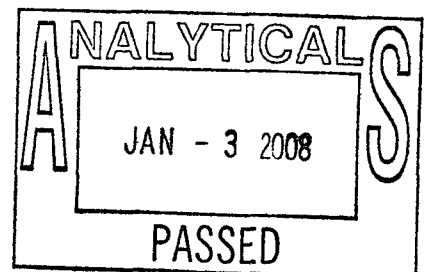
Hall Environmental Analysis Laboratory, Inc.

Date: 03-Jan-08

CLIENT: Industrial Ecosystems, Inc.
Lab Order: 0712353
Project: JFJ Land Farm
Lab ID: 0712353-06

Client Sample ID: Community pit #585
Collection Date: 12/26/2007 10:20:00 AM
Date Received: 12/27/2007
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC
Diesel Range Organics (DRO)	10	10		mg/Kg	1	1/2/2008 10:42:06 AM
Motor Oil Range Organics (MRO)	ND	50		mg/Kg	1	1/2/2008 10:42:06 AM
Surr: DNOP	111	61.7-135		%REC	1	1/2/2008 10:42:06 AM
EPA METHOD 8015B: GASOLINE RANGE						Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	12/28/2007 2:18:18 PM
Surr: BFB	107	84-138		%REC	1	12/28/2007 2:18:18 PM
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	12/28/2007 2:18:18 PM
Benzene	ND	0.050		mg/Kg	1	12/28/2007 2:18:18 PM
Toluene	ND	0.050		mg/Kg	1	12/28/2007 2:18:18 PM
Ethylbenzene	ND	0.050		mg/Kg	1	12/28/2007 2:18:18 PM
Xylenes, Total	ND	0.10		mg/Kg	1	12/28/2007 2:18:18 PM
Surr: 4-Bromofluorobenzene	96.1	81.4-117		%REC	1	12/28/2007 2:18:18 PM



Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Date: 05-Aug-08

CLIENT: Industrial Ecosystems, Inc.
Project: JFJ Land Farm

Lab Order: 0807324

Lab ID: 0807324-01
Client Sample ID: Graves #105

Collection Date: 7/22/2008 1:45:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						Analyst: SLB
Chloride	210	3.0		mg/Kg	10	7/30/2008 10:39:05 PM

Lab ID: 0807324-02
Client Sample ID: Basin #101

Collection Date: 7/22/2008 2:05:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						Analyst: SLB
Chloride	710	3.0		mg/Kg	10	7/30/2008 10:56:30 PM

Lab ID: 0807324-03
Client Sample ID: Red Cedar #104

Collection Date: 7/22/2008 2:20:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						Analyst: SLB
Chloride	600	3.0		mg/Kg	10	7/30/2008 11:13:54 PM

Lab ID: 0807324-04
Client Sample ID: Community pit #585

Collection Date: 7/22/2008 2:45:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						Analyst: SLB
Chloride	590	3.0		mg/Kg	10	7/30/2008 11:31:18 PM

Lab ID: 0807324-05
Client Sample ID: Burlington #597

Collection Date: 7/22/2008 2:53:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						Analyst: SLB
Chloride	150	3.0		mg/Kg	10	7/30/2008 11:48:43 PM

Lab ID: 0807324-06
Client Sample ID: Graves #105B

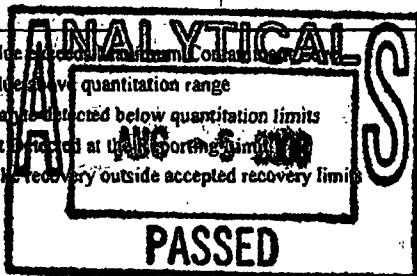
Collection Date: 7/22/2008
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						Analyst: SLB
Chloride	340	3.0		mg/Kg	10	7/31/2008 12:06:07 AM

Qualifiers:

- * Value exceeds maximum contaminant level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not detected at the reporting limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit



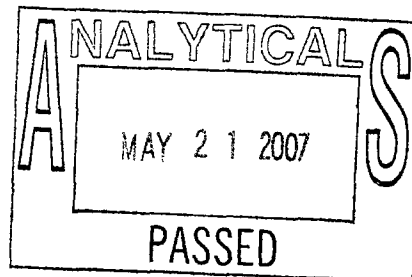
Hall Environmental Analysis Laboratory, Inc.

Date: 21-May-07

CLIENT: Industrial Ecosystems, Inc.
Lab Order: 0705249
Project: JFJ Land Farm
Lab ID: 0705249-16

Client Sample ID: Burlington #597
Collection Date: 5/15/2007 1:28:00 PM
Date Received: 5/17/2007
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	5/20/2007 3:12:57 PM
Motor Oil Range Organics (MRO)	ND	50		mg/Kg	1	5/20/2007 3:12:57 PM
Surr: DNOP	113	61.7-135		%REC	1	5/20/2007 3:12:57 PM
EPA METHOD 8015B: GASOLINE RANGE						Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	5/19/2007 3:41:00 AM
Surr: BFB	112	84-138		%REC	1	5/19/2007 3:41:00 AM
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	5/19/2007 3:41:00 AM
Benzene	ND	0.050		mg/Kg	1	5/19/2007 3:41:00 AM
Toluene	ND	0.050		mg/Kg	1	5/19/2007 3:41:00 AM
Ethylbenzene	ND	0.050		mg/Kg	1	5/19/2007 3:41:00 AM
Xylenes, Total	ND	0.10		mg/Kg	1	5/19/2007 3:41:00 AM
Surr: 4-Bromofluorobenzene	86.2	68.2-109		%REC	1	5/19/2007 3:41:00 AM



Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Page 16 of 16

Hall Environmental Analysis Laboratory, Inc.

Date: 05-Aug-08

CLIENT: Industrial Ecosystems, Inc.
Project: JFJ Land Farm

Lab Order: 0807324

Lab ID: 0807324-01
Client Sample ID: Graves #105

Collection Date: 7/22/2008 1:45:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	210	3.0		mg/Kg	10	Analyst: SLB 7/30/2008 10:39:05 PM

Lab ID: 0807324-02
Client Sample ID: Basin #101

Collection Date: 7/22/2008 2:05:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	710	3.0		mg/Kg	10	Analyst: SLB 7/30/2008 10:56:30 PM

Lab ID: 0807324-03
Client Sample ID: Red Cedar #104

Collection Date: 7/22/2008 2:20:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	600	3.0		mg/Kg	10	Analyst: SLB 7/30/2008 11:13:54 PM

Lab ID: 0807324-04
Client Sample ID: Community pit #585

Collection Date: 7/22/2008 2:45:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	590	3.0		mg/Kg	10	Analyst: SLB 7/30/2008 11:31:18 PM

Lab ID: 0807324-05
Client Sample ID: Burlington #597

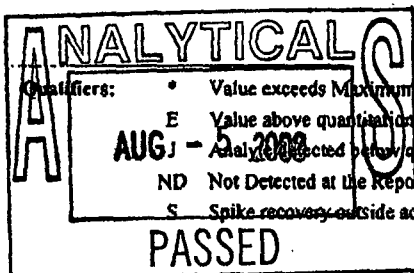
Collection Date: 7/22/2008 2:53:00 PM
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	150	3.0		mg/Kg	10	Analyst: SLB 7/30/2008 11:48:43 PM

Lab ID: 0807324-06
Client Sample ID: Graves #105B

Collection Date: 7/22/2008
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	340	3.0		mg/Kg	10	Analyst: SLB 7/31/2008 12:06:07 AM



Qualifiers:

- Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- ND Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

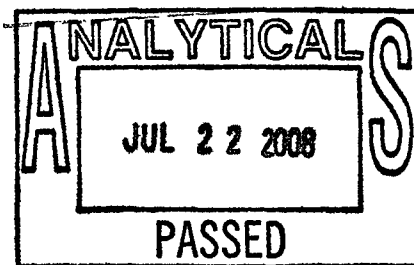
B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
MCL Maximum Contaminant Level
RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Date: 30-Jul-08

CLIENT: Industrial Ecosystems, Inc.**Client Sample ID:** Community (L) #641**Lab Order:** 0807323**Collection Date:** 7/22/2008 12:45:00 PM**Project:** JFJ Land Farm**Date Received:** 7/24/2008**Lab ID:** 0807323-10**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	7/26/2008 7:58:09 AM
Motor Oil Range Organics (MRO)	ND	50		mg/Kg	1	7/26/2008 7:58:09 AM
Surr: DNOP	91.3	61.7-135		%REC	1	7/26/2008 7:58:09 AM
EPA METHOD 8015B: GASOLINE RANGE						Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	7/26/2008 5:17:46 AM
Surr: BFB	91.5	84-138		%REC	1	7/26/2008 5:17:46 AM
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	7/26/2008 5:17:46 AM
Benzene	ND	0.050		mg/Kg	1	7/26/2008 5:17:46 AM
Toluene	ND	0.050		mg/Kg	1	7/26/2008 5:17:46 AM
Ethylbenzene	ND	0.050		mg/Kg	1	7/26/2008 5:17:46 AM
Xylenes, Total	ND	0.10		mg/Kg	1	7/26/2008 5:17:46 AM
Surr: 4-Bromofluorobenzene	97.9	81.4-117		%REC	1	7/26/2008 5:17:46 AM
EPA METHOD 300.0: ANIONS						Analyst: IC
Chloride	120	3.0		mg/Kg	10	7/30/2008 12:19:03 AM



Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit



New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor

Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



October 29, 2008

Ms. Marcella Marquez
JFJ Landfarm, L.L.C.
Industrial Ecosystems Inc.
Soil Reclamation Center
P.O. Box 2043
Farmington, New Mexico 87499

RE: Request for Approval to Reuse Remediated Biopile Soils for the Stabilization/Solidification of Drilling Mud and Tank Bottoms and Sludge
JFJ Landfarm, LLC - Industrial Ecosystems Inc.
JFJ Landfarm - Permit # NM01-0010B
NW/4, SE/4, Section 2, Township 29 North, Range 12 West, NMPM,
San Juan County, New Mexico

Dear Ms. Marquez:

The New Mexico Oil Conservation Division (OCD) has reviewed JFJ Landfarm, LLC's (JFJ) two request, both dated October 17, 2008, and analytical results to reuse the remediated soils in the following biopile for the stabilization and/or solidification of incoming drilling mud and tank bottoms and sludge:

Pile # 624 Community
Pile # 6 Basin
Pile # 521 Burlington

Pile # 0 Basin
Pile # 313 Basin
Pile # 569 Burlington

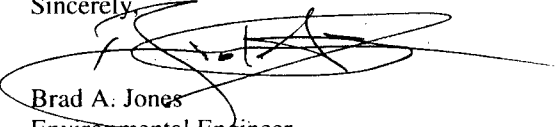
Based upon the information provided, the above-referenced biopile is hereby approved for the stabilization and/or solidification of incoming drilling mud and tank bottoms and sludge.

As stated in our last approval, dated October 20, 2008, OCD still anticipates the submittal of the proposal, analytical results, and confirmation from the from the pipeline operators to address the accumulation of soils within the facility boundary, as initially identified in the August 6, 2008 written response. OCD wishes to remind JFJ that OCD approval is required for and prior to the release and reuse of any remediated soils on or off the facility property.

Please be advised that approval of this request does not relieve the JFJ of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve JFJ of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,



Brad A. Jones
Environmental Engineer

BAJ/baj
cc: OCD District III Office, Aztec





P.O. Box 2043
Farmington, NM 87499

Industrial Ecosystems Inc.
Soil Reclamation Center

Phone: (505) 632-1782
Fax: (505) 632-1879

RECEIVED

#49 CR 3150
Aztec, NM 87410

2008 OCT 20 PM 3 36

October 17, 2008

Brad A. Jones
Environmental Engineer
Environmental Bureau
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

RE: Use of reclaimed soil

Dear Brad:

Recent analytical results show that the following biopiles(s) have reached acceptable levels as required by the NMOCD.

- Pile # 624 Community

We are seeking your approval to recycle this soil by using it to mix/solidify incoming liquid waste.

Sincerely,

A handwritten signature in cursive script that reads "Marcella Marquez".

Marcella Marquez
Administrative Officer

Enclosure(s) – Analytical Reports

Hall Environmental Analysis Laboratory, Inc.

Date: 16-Oct-08

CLIENT: Industrial Ecosystems, Inc.
Project: JFJ Land Farm

Lab Order: 0810073

Lab ID: 0810073-08 Collection Date: 10/2/2008 9:30:00 AM
Client Sample ID: Dugan #557 Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						Analyst: SLB
Chloride	830	3.0		mg/Kg	10	10/14/2008 1:17:33 PM

Lab ID: 0810073-09 Collection Date: 10/2/2008 9:50:00 AM
Client Sample ID: Burlington #569 Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						Analyst: SLB
Chloride	720	3.0		mg/Kg	10	10/14/2008 1:34:57 PM

Lab ID: 0810073-11 Collection Date: 10/2/2008 10:20:00 AM
Client Sample ID: Community #624 Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						Analyst: SLB
Chloride	790	3.0		mg/Kg	10	10/14/2008 2:09:45 PM

Lab ID: 0810073-12 Collection Date: 10/2/2008 10:40:00 AM
Client Sample ID: Burlington #625 Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						Analyst: SLB
Chloride	970	3.0		mg/Kg	10	10/14/2008 2:27:11 PM

Qualifiers: * Value exceeds Maximum Contaminant Level
B Value above quantitation range
J Analyte detected below quantitation limits
ND Not Detected at the Reporting Limit
C Sample measured outside reported recovery limits

B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
MCL Maximum Contaminant Level
RL Reporting Limit

2

Hall Environmental Analysis Laboratory, Inc.

Date: 30-Jun-08

CLIENT: Industrial Ecosystems, Inc.

Client Sample ID: Community #624

Lab Order: 0806270

Collection Date: 6/16/2008 10:10:00 AM

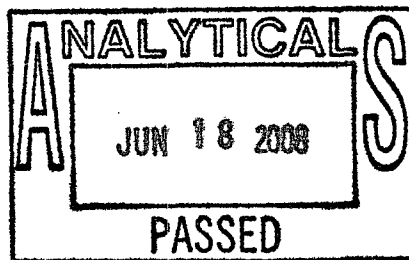
Project: JFJ Land Farm

Date Received: 6/18/2008

Lab ID: 0806270-03

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	6/20/2008 5:57:44 AM
Motor Oil Range Organics (MRO)	ND	50		mg/Kg	1	6/20/2008 5:57:44 AM
Surr: DNOP	69.9	61.7-135		%REC	1	6/20/2008 5:57:44 AM
EPA METHOD 8015B: GASOLINE RANGE						Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	6/24/2008 2:44:47 PM
Surr: BFB	101	84-138		%REC	1	6/24/2008 2:44:47 PM
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	6/24/2008 2:44:47 PM
Benzene	ND	0.050		mg/Kg	1	6/24/2008 2:44:47 PM
Toluene	ND	0.050		mg/Kg	1	6/24/2008 2:44:47 PM
Ethylbenzene	ND	0.050		mg/Kg	1	6/24/2008 2:44:47 PM
Xylenes, Total	ND	0.10		mg/Kg	1	6/24/2008 2:44:47 PM
Surr: 4-Bromofluorobenzene	101	81.4-117		%REC	1	6/24/2008 2:44:47 PM
EPA METHOD 9056A: ANIONS						Analyst: SLB
Chloride	150	1.5		mg/Kg	5	6/25/2008 9:12:52 PM



Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit



**Industrial Ecosystems Inc.
Soil Reclamation Center**

P.O. Box 2043
Farmington, NM 87499

Phone: (505) 632-1782
Fax: (505) 632-1876

RECEIVED

2008 OCT 20 PM 3 51
49 CR 3150
Aztec, NM 87410

October 17, 2008

Brad A. Jones
Environmental Engineer
Environmental Bureau
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

RE: Use of reclaimed soil

Dear Brad:

Recent analytical results show that the following biopiles(s) have reached acceptable levels as required by the NMOCD.

- Pile # 0 Basin
- Pile # 6 Basin
- Pile # 313 Basin
- Pile # 521 Burlington
- Pile # 569 Burlington

We are seeking your approval to recycle this soil by using it to mix/solidify incoming liquid waste.

Sincerely,

A handwritten signature in cursive script that reads 'Marcella Marquez'.

Marcella Marquez
Administrative Officer

Enclosure(s) – Analytical Reports

Hall Environmental Analysis Laboratory, Inc.

Date: 16-Oct-08

CLIENT: Industrial Ecosystems, Inc.
Project: JFJ Land Farm

Lab Order: 0810073

Lab ID: 0810073-01

Collection Date: 10/2/2008 7:30:00 AM

Client Sample ID: Basin #0

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	660	3.0		mg/Kg	10	10/14/2008 10:40:53 AM

Analyst: SLB

Lab ID: 0810073-02

Collection Date: 10/2/2008 7:55:00 AM

Client Sample ID: Elmridge #4

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	810	3.0		mg/Kg	10	10/14/2008 10:58:18 AM

Analyst: SLB

Lab ID: 0810073-03

Collection Date: 10/2/2008 8:15:00 AM

Client Sample ID: Basin #6

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	750	3.0		mg/Kg	10	10/14/2008 11:15:42 AM

Analyst: SLB

Lab ID: 0810073-04

Collection Date: 10/2/2008 8:35:00 AM

Client Sample ID: Red Willow #60

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	890	3.0		mg/Kg	10	10/14/2008 11:33:06 AM

Analyst: SLB

Lab ID: 0810073-05

Collection Date: 10/2/2008 8:45:00 AM

Client Sample ID: Basin #313

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	480	3.0		mg/Kg	10	10/14/2008 11:50:31 AM

Analyst: SLB

Lab ID: 0810073-06

Collection Date: 10/2/2008 8:58:00 AM

Client Sample ID: Burlington #521

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	430	3.0		mg/Kg	10	10/14/2008 12:07:56 PM

Analyst: SLB

Qualifiers: * Value exceeds Maximum Contaminant Level
E Value above quantitation range
J Analyte detected below quantitation limits
ND Not Detected at the Reporting Limit
C Failure requires outside reported maximum limits

B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
MCL Maximum Contaminant Level
RL Reporting Limit

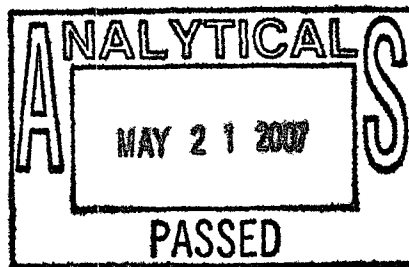
Hall Environmental Analysis Laboratory, Inc.

Date: 21-May-07

CLIENT: Industrial Ecosystems, Inc.
Lab Order: 0705249
Project: JFJ Land Farm
Lab ID: 0705249-01

Client Sample ID: Basin #0
Collection Date: 5/15/2007 9:45:00 AM
Date Received: 5/17/2007
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	5/18/2007 3:39:14 PM
Motor Oil Range Organics (MRO)	ND	50		mg/Kg	1	5/18/2007 3:39:14 PM
Surr: DNOP	76.5	61.7-135		%REC	1	5/18/2007 3:39:14 PM
EPA METHOD 8015B: GASOLINE RANGE						Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	5/18/2007 4:09:56 PM
Surr: BFB	112	84-138		%REC	1	5/18/2007 4:09:56 PM
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	5/18/2007 4:09:56 PM
Benzene	ND	0.050		mg/Kg	1	5/18/2007 4:09:56 PM
Toluene	ND	0.050		mg/Kg	1	5/18/2007 4:09:56 PM
Ethylbenzene	ND	0.050		mg/Kg	1	5/18/2007 4:09:56 PM
Xylenes, Total	ND	0.10		mg/Kg	1	5/18/2007 4:09:56 PM
Surr: 4-Bromofluorobenzene	87.1	68.2-109		%REC	1	5/18/2007 4:09:56 PM



Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

ANALYTICAL

Hall Environmental Analysis Laboratory, Inc.

Date: 16-Oct-08

CLIENT: Industrial Ecosystems, Inc.
Project: JFJ Land Farm

Lab Order: 0810073

Lab ID: 0810073-01

Collection Date: 10/2/2008 7:30:00 AM

Client Sample ID: Basin #0

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	660	3.0		mg/Kg	10	Analyst: SLB 10/14/2008 10:40:53 AM

Lab ID: 0810073-02

Collection Date: 10/2/2008 7:55:00 AM

Client Sample ID: Elmridge #4

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	810	3.0		mg/Kg	10	Analyst: SLB 10/14/2008 10:58:18 AM

Lab ID: 0810073-03

Collection Date: 10/2/2008 8:15:00 AM

Client Sample ID: Basin #6

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	750	3.0		mg/Kg	10	Analyst: SLB 10/14/2008 11:15:42 AM

Lab ID: 0810073-04

Collection Date: 10/2/2008 8:35:00 AM

Client Sample ID: Red Willow #60

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	890	3.0		mg/Kg	10	Analyst: SLB 10/14/2008 11:33:06 AM

Lab ID: 0810073-05

Collection Date: 10/2/2008 8:45:00 AM

Client Sample ID: Basin #313

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	480	3.0		mg/Kg	10	Analyst: SLB 10/14/2008 11:50:31 AM

Lab ID: 0810073-06

Collection Date: 10/2/2008 8:58:00 AM

Client Sample ID: Burlington #521

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	430	3.0		mg/Kg	10	Analyst: SLB 10/14/2008 12:07:56 PM

Qualifiers: * Value exceeds Maximum Contaminant Level
E Value above quantitation range
J Analyte detected below quantitation limits
ND Not Detected at the Reporting Limit
c Solids recovery outside accepted recovery limits

B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
MCL Maximum Contaminant Level
RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Date: 21-May-07

CLIENT: Industrial Ecosystems, Inc.

Client Sample ID: Basin #6

Lab Order: 0705249

Collection Date: 5/15/2007 10:15:00 AM

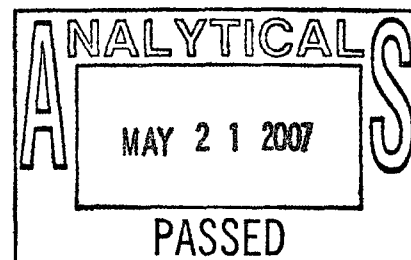
Project: JFJ Land Farm

Date Received: 5/17/2007

Lab ID: 0705249-03

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	5/18/2007 4:48:20 PM
Motor Oil Range Organics (MRO)	ND	50		mg/Kg	1	5/18/2007 4:48:20 PM
Surr: DNOP	89.8	61.7-135		%REC	1	5/18/2007 4:48:20 PM
EPA METHOD 8015B: GASOLINE RANGE						Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	5/18/2007 6:10:23 PM
Surr: BFB	110	84-138		%REC	1	5/18/2007 6:10:23 PM
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	5/18/2007 6:10:23 PM
Benzene	ND	0.050		mg/Kg	1	5/18/2007 6:10:23 PM
Toluene	ND	0.050		mg/Kg	1	5/18/2007 6:10:23 PM
Ethylbenzene	ND	0.050		mg/Kg	1	5/18/2007 6:10:23 PM
Xylenes, Total	ND	0.10		mg/Kg	1	5/18/2007 6:10:23 PM
Surr: 4-Bromofluorobenzene	84.9	68.2-109		%REC	1	5/18/2007 6:10:23 PM



Qualifiers: * Value exceeds Maximum Contaminant Level
E Value above quantitation range
J Analyte detected below quantitation limits
ND Not Detected at the Reporting Limit
S Spike recovery outside accepted recovery limits

B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
MCL Maximum Contaminant Level
RL Reporting Limit

Page 3 of 16

10-16-'08 15:11

RECEIVED 10/16/2008 16:18 5056321876
FROM-INDUSTRIAL ECOSYSTEM
T-295 P002/006 F-575**Hall Environmental Analysis Laboratory, Inc.**

Date: 16-Oct-08

CLIENT: Industrial Ecosystems, Inc.
Project: JFJ Land Farm

Lab Order: 0810073

Lab ID: 0810073-01

Collection Date: 10/2/2008 7:30:00 AM

Client Sample ID: Basin #0

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	660	3.0		mg/Kg	10	Analyst: SLB 10/14/2008 10:40:53 AM

Lab ID: 0810073-02

Collection Date: 10/2/2008 7:55:00 AM

Client Sample ID: Elmridge #4

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	810	3.0		mg/Kg	10	Analyst: SLB 10/14/2008 10:58:18 AM

Lab ID: 0810073-03

Collection Date: 10/2/2008 8:15:00 AM

Client Sample ID: Basin #6

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	750	3.0		mg/Kg	10	Analyst: SLB 10/14/2008 11:15:42 AM

Lab ID: 0810073-04

Collection Date: 10/2/2008 8:35:00 AM

Client Sample ID: Red Willow #60

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	890	3.0		mg/Kg	10	Analyst: SLB 10/14/2008 11:33:06 AM

Lab ID: 0810073-05

Collection Date: 10/2/2008 8:45:00 AM

Client Sample ID: Basin #313

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	480	3.0		mg/Kg	10	Analyst: SLB 10/14/2008 11:50:31 AM

Lab ID: 0810073-06

Collection Date: 10/2/2008 8:58:00 AM

Client Sample ID: Burlington #521

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	430	3.0		mg/Kg	10	Analyst: SLB 10/14/2008 12:07:56 PM

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- o Failure occurred outside accepted precision limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

1

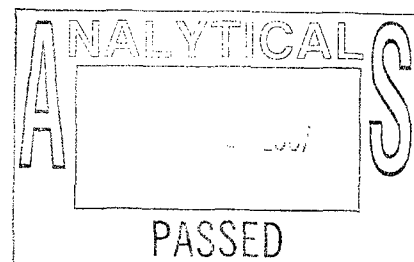
Hall Environmental Analysis Laboratory, Inc.

Date: 22-Feb-07

CLIENT: Industrial Ecosystems, Inc.
Lab Order: 0702228
Project: JFJ Land Farm
Lab ID: 0702228-11

Client Sample ID: Basin 313
Collection Date: 2/20/2007 10:20:00 AM
Date Received: 2/21/2007
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	2/21/2007 10:50:35 PM
Motor Oil Range Organics (MRO)	ND	50		mg/Kg	1	2/21/2007 10:50:35 PM
Surr: DNOP	84.2	61.7-135		%REC	1	2/21/2007 10:50:35 PM
EPA METHOD 8015B: GASOLINE RANGE						Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	2/22/2007 2:02:19 AM
Surr: BFB	106	84-138		%REC	1	2/22/2007 2:02:19 AM
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	2/22/2007 2:02:19 AM
Benzene	ND	0.050		mg/Kg	1	2/22/2007 2:02:19 AM
Toluene	ND	0.050		mg/Kg	1	2/22/2007 2:02:19 AM
Ethylbenzene	ND	0.050		mg/Kg	1	2/22/2007 2:02:19 AM
Xylenes, Total	ND	0.10		mg/Kg	1	2/22/2007 2:02:19 AM
Surr: 4-Bromofluorobenzene	89.2	68.2-109		%REC	1	2/22/2007 2:02:19 AM



Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Date: 16-Oct-08

CLIENT: Industrial Ecosystems, Inc.
Project: JFJ Land Farm

Lab Order: 0810073

Lab ID: 0810073-01

Collection Date: 10/2/2008 7:30:00 AM

Client Sample ID: Basin #0

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	660	3.0		mg/Kg	10	10/14/2008 10:40:53 AM

Analyst: SLB

Lab ID: 0810073-02

Collection Date: 10/2/2008 7:55:00 AM

Client Sample ID: Elmridge #4

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	810	3.0		mg/Kg	10	10/14/2008 10:58:18 AM

Analyst: SLB

Lab ID: 0810073-03

Collection Date: 10/2/2008 8:15:00 AM

Client Sample ID: Basin #6

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	750	3.0		mg/Kg	10	10/14/2008 11:15:42 AM

Analyst: SLB

Lab ID: 0810073-04

Collection Date: 10/2/2008 8:35:00 AM

Client Sample ID: Red Willow #60

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	890	3.0		mg/Kg	10	10/14/2008 11:33:08 AM

Analyst: SLB

Lab ID: 0810073-05

Collection Date: 10/2/2008 8:45:00 AM

Client Sample ID: Basin #313

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	480	3.0		mg/Kg	10	10/14/2008 11:50:31 AM

Analyst: SLB

Lab ID: 0810073-06

Collection Date: 10/2/2008 8:58:00 AM

Client Sample ID: Burlington #521

Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	430	3.0		mg/Kg	10	10/14/2008 12:07:56 PM

Analyst: SLB

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- o Value exceeds outside reported maximum limits

B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
MCL Maximum Contaminant Level
RL Reporting Limit

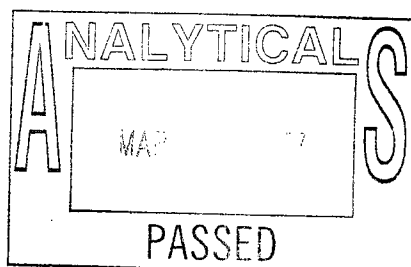
Hall Environmental Analysis Laboratory, Inc.

Date: 28-Mar-07

CLIENT: Industrial Ecosystems, Inc.
Lab Order: 0703336
Project: JFJ Land Farm
Lab ID: 0703336-12

Client Sample ID: Burlington 521
Collection Date: 3/21/2007 12:52:00 PM
Date Received: 3/22/2007
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC
Diesel Range Organics (DRO)	13	10		mg/Kg	1	3/27/2007 3:21:07 AM
Motor Oil Range Organics (MRO)	ND	50		mg/Kg	1	3/27/2007 3:21:07 AM
Surr: DNOP	95.7	61.7-135		%REC	1	3/27/2007 3:21:07 AM
EPA METHOD 8015B: GASOLINE RANGE						Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	3/26/2007 7:15:12 PM
Surr: BFB	112	84-138		%REC	1	3/26/2007 7:15:12 PM
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	3/26/2007 7:15:12 PM
Benzene	ND	0.050		mg/Kg	1	3/26/2007 7:15:12 PM
Toluene	ND	0.050		mg/Kg	1	3/26/2007 7:15:12 PM
Ethylbenzene	ND	0.050		mg/Kg	1	3/26/2007 7:15:12 PM
Xylenes, Total	ND	0.10		mg/Kg	1	3/26/2007 7:15:12 PM
Surr: 4-Bromofluorobenzene	91.0	68.2-109		%REC	1	3/26/2007 7:15:12 PM



Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Date: 16-Oct-08

CLIENT: Industrial Ecosystems, Inc.
Project: JFJ Land Farm

Lab Order: 0810073

Lab ID:	0810073-08	Collection Date:	10/2/2008 9:30:00 AM
Client Sample ID:	Dugan #557	Matrix:	SOIL
Analyses	Result	PQL Qual Units	DF Date Analyzed
EPA METHOD 300.0: ANIONS			Analyst: SLB
Chloride	830	3.0 mg/Kg	10 10/14/2008 1:17:33 PM

Lab ID:	0810073-09	Collection Date:	10/2/2008 9:50:00 AM
Client Sample ID:	Burlington #569	Matrix:	SOIL
Analyses	Result	PQL Qual Units	DF Date Analyzed
EPA METHOD 300.0: ANIONS			Analyst: SLB
Chloride	720	3.0 mg/Kg	10 10/14/2008 1:34:57 PM

Lab ID:	0810073-11	Collection Date:	10/2/2008 10:20:00 AM
Client Sample ID:	Community #624	Matrix:	SOIL
Analyses	Result	PQL Qual Units	DF Date Analyzed
EPA METHOD 300.0: ANIONS			Analyst: SLB
Chloride	790	3.0 mg/Kg	10 10/14/2008 2:09:45 PM

Lab ID:	0810073-12	Collection Date:	10/2/2008 10:40:00 AM
Client Sample ID:	Burlington #625	Matrix:	SOIL
Analyses	Result	PQL Qual Units	DF Date Analyzed
EPA METHOD 300.0: ANIONS			Analyst: SLB
Chloride	970	3.0 mg/Kg	10 10/14/2008 2:27:11 PM

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- B Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- C Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

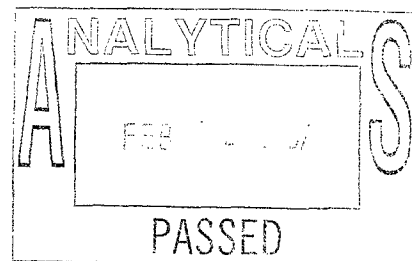
Hall Environmental Analysis Laboratory, Inc.

Date: 22-Feb-07

CLIENT: Industrial Ecosystems, Inc.
Lab Order: 0702228
Project: JFJ Land Farm
Lab ID: 0702228-12

Client Sample ID: Burlington 569
Collection Date: 2/20/2007 10:00:00 AM
Date Received: 2/21/2007
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC
Diesel Range Organics (DRO)	17	10		mg/Kg	1	2/21/2007 11:24:28 PM
Motor Oil Range Organics (MRO)	ND	50		mg/Kg	1	2/21/2007 11:24:28 PM
Surr: DNOP	89.4	61.7-135		%REC	1	2/21/2007 11:24:28 PM
EPA METHOD 8015B: GASOLINE RANGE						Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	2/22/2007 2:32:23 AM
Surr: BFB	107	84-138		%REC	1	2/22/2007 2:32:23 AM
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	2/22/2007 2:32:23 AM
Benzene	ND	0.050		mg/Kg	1	2/22/2007 2:32:23 AM
Toluene	ND	0.050		mg/Kg	1	2/22/2007 2:32:23 AM
Ethylbenzene	ND	0.050		mg/Kg	1	2/22/2007 2:32:23 AM
Xylenes, Total	ND	0.10		mg/Kg	1	2/22/2007 2:32:23 AM
Surr: 4-Bromofluorobenzene	89.6	68.2-109		%REC	1	2/22/2007 2:32:23 AM



Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit



New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor

Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



October 20, 2008

Ms. Marcella Marquez
JFJ Landfarm, L.L.C.
Industrial Ecosystems Inc.
Soil Reclamation Center
P.O. Box 2043
Farmington, New Mexico 87499

RE: Request for Approval to Reuse Remediated Biopile Soils for the Stabilization/Solidification of Drilling Mud and Tank Bottoms and Sludge
JFJ Landfarm, LLC - Industrial Ecosystems Inc.
JFJ Landfarm - Permit # NM01-0010B
NW/4, SE/4, Section 2, Township 29 North, Range 12 West, NMPM,
San Juan County, New Mexico

Dear Ms. Marquez:

The New Mexico Oil Conservation Division (OCD) has reviewed JFJ Landfarm, LLC's (JFJ) request, dated October 8, 2008, and analytical results to reuse the remediated soils in the following biopile for the stabilization and/or solidification of incoming drilling mud and tank bottoms and sludge:

Pile # 517 XTO

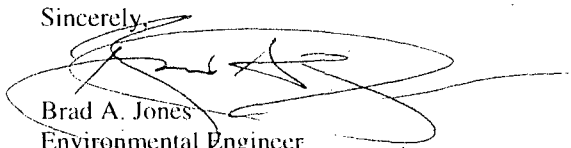
Based upon the information provided, the above-referenced biopile is hereby approved for the stabilization and/or solidification of incoming drilling mud and tank bottoms and sludge.

OCD still anticipates the submittal of the proposal, analytical results, and confirmation from the from the pipeline operators to address the accumulation of soils within the facility boundary, as identified in the August 6, 2008 written response. OCD wishes to remind JFJ that OCD approval is required for and prior to the release and reuse of any remediated soils on or off the facility property.

Please be advised that approval of this request does not relieve the JFJ of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve JFJ of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,



Brad A. Jones
Environmental Engineer

BAJ/baj
cc: OCD District III Office, Aztec



2008 OCT 10 PM 1 59



**Industrial Ecosystems Inc.
Soil Reclamation Center**

P.O. Box 2043
Farmington, NM 87499

Phone: (505) 632-1782
Fax: (505) 632-1876

#49 CR 3150
Aztec, NM 87410

October 8, 2008

Brad A. Jones

Environmental Engineer
Environmental Bureau
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

RE: Use of reclaimed soil

Dear Brad:

Recent analytical results show that the following biopiles(s) have reached acceptable levels as required by the NMOCD.

- Pile # 517 XTO

We are seeking your approval to recycle this soil by using it to mix/solidify incoming liquid waste.

Sincerely,

A handwritten signature in cursive script that reads 'Marcella Marquez'.

Marcella Marquez
Administrative Officer

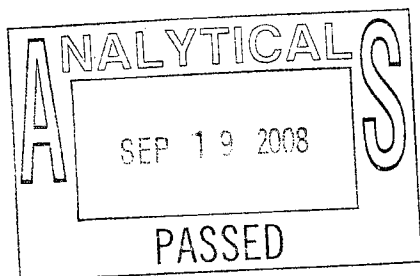
Enclosure(s) – Analytical Reports

Hall Environmental Analysis Laboratory, Inc.

Date: 01-Oct-08

CLIENT: Industrial Ecosystems, Inc.**Client Sample ID:** XTO #517**Lab Order:** 0809404**Collection Date:** 9/16/2008 2:50:00 PM**Project:** JFJ Land Farm**Date Received:** 9/19/2008**Lab ID:** 0809404-10**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						Analyst: SLB
Chloride	69	3.0		mg/Kg	10	9/26/2008 6:19:50 PM



Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

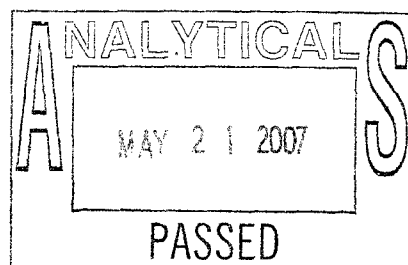
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Date: 21-May-07

CLIENT: Industrial Ecosystems, Inc.**Client Sample ID:** XTO #517**Lab Order:** 0705249**Collection Date:** 5/15/2007 1:15:00 PM**Project:** JFJ Land Farm**Date Received:** 5/17/2007**Lab ID:** 0705249-15**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: SCC
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	5/20/2007 2:38:33 PM
Motor Oil Range Organics (MRO)	ND	50		mg/Kg	1	5/20/2007 2:38:33 PM
Surr: DNOP	94.8	61.7-135		%REC	1	5/20/2007 2:38:33 PM
EPA METHOD 8015B: GASOLINE RANGE						Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	5/19/2007 1:10:41 AM
Surr: BFB	112	84-138		%REC	1	5/19/2007 1:10:41 AM
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	5/19/2007 1:10:41 AM
Benzene	ND	0.050		mg/Kg	1	5/19/2007 1:10:41 AM
Toluene	ND	0.050		mg/Kg	1	5/19/2007 1:10:41 AM
Ethylbenzene	ND	0.050		mg/Kg	1	5/19/2007 1:10:41 AM
Xylenes, Total	ND	0.10		mg/Kg	1	5/19/2007 1:10:41 AM
Surr: 4-Bromofluorobenzene	88.0	68.2-109		%REC	1	5/19/2007 1:10:41 AM



Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

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