

AP - 40

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**  
2005 - 2006

AP040



**RICHARDSON OPERATING COMPANY**

2006 SEP 25 PM 1 10

5600 South Quebec Street, Suite 130B  
Greenwood Village, CO 80111  
(303) 830-8000 Fax (303) 830-8009

September 21, 2006

New Mexico Energy, Minerals and Natural Resources Department  
1220 South St. Francis Drive  
Santa Fe, NM 87505

ATTN: Glenn von Gonten

**RE: BOB AND BLANCHE #1 MONITORING PLAN**

Dear Mr. von Gonten,

In response to your letter dated September 12, 2006 Richardson Operating Company (Richardson) has made the requested changes and a copy has been attached.

Please call me at 303-830-8000 if you have any questions.

Regards,

A handwritten signature in black ink, appearing to read "John A. Heinle", is written over a horizontal line.

John A. Heinle  
Land / Engineering

**Bob and Blanche Monitoring Program:**

Every 90 days Richardson Operating company will monitor the ten selected wells for Benzene, Toluene, Ethylbenzene, p,m-Xylene and o-Xylene. At the end of the 90 day period richardson will submit the results and after 8 quarters will submit a final site investigation report. The submittal deadlines are as follows:

<u>Monitoring Period</u>	<u>Submittal Deadline</u>	<u>Document(s) Submitted</u>
10/1/2006 - 12/31/2006	1/1/2007	Progress Report 1
1/1/2007 - 3/31/2007	4/1/2007	Progress Report 2
4/1/2007 - 6/30/2007	7/1/2007	Progress Report 3
7/1/2007 - 9/30/2007	10/1/2007	Progress Report 4
10/1/2007 - 12/31/2007	1/1/2008	Progress Report 5
1/1/2008 - 3/31/2008	4/1/2008	Progress Report 6
<del>4/1/2008 - 6/30/2008</del>	<del>7/1/2008</del>	<del>Progress Report 7</del>
7/1/2008 - 9/30/2008	10/1/2008	Progress Report 8 & Final Site Investigation Report

**Quality Assurance Plan**

In order to assure the quality of the samples taken the following measures will be taken. The sample procedure will follow USEPA SW-846 protocol. Water levels will be measured prior to bailing each well. A minimum of three (3) well volumes will be removed from each well prior to sampling using a new disposable bailer. Conductivity, pH, and temperature will be measured and recorded. Samples will be collected into 40 ml VOA vials with Teflon closures, preserved with HgCl2, capped headspace free, labeled, and stored on ice in an ice chest. One trip blank per day shall be collected and analyzed for BTEX by USEPA method 8021B.



**RICHARDSON OPERATING COMPANY**

5600 South Quebec Street, Suite 130B  
Greenwood Village, CO 80111  
(303) 830-8000 Fax (303) 830-8009

August 22, 2006

RECEIVED

AUG 24 2006

Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

New Mexico Energy, Minerals and Natural Resources Department  
1220 South St. Francis Drive  
Santa Fe, NM 87505

ATTN: Glenn von Gonten

**RE: BOB AND BLANCHE #1 MONITORING PLAN**

Dear Mr. von Gonten,

In response to your letter dated May 10, 2006 Richardson Operating Company (Richardson) has compiled a list of near by water wells and developed a monitoring program. Richardson has selected five wells in addition to the five original monitor wells and will monitor these wells for BTEX. Richardson will provide a quarterly monitoring progress report outlining the results of the samples taken. At the end of this period Richardson will submit a detailed final site investigation report documenting the results.

Please refer to attached information for the following:

1. Inventory of water wells within one mile from the site
2. Water wells selected for monitoring
3. Envirotech Monitor Wells selected for monitoring
4. Monitoring Plan & Schedule (including submission deadline for quarterly reports and final site investigation)

Please call me at 303-830-8000 if you have any questions.

Sincerely,

John A. Heinle  
Land / Engineering

### Richardson Operating Water Wells within 1 mile radius of Bob & Blanche #1

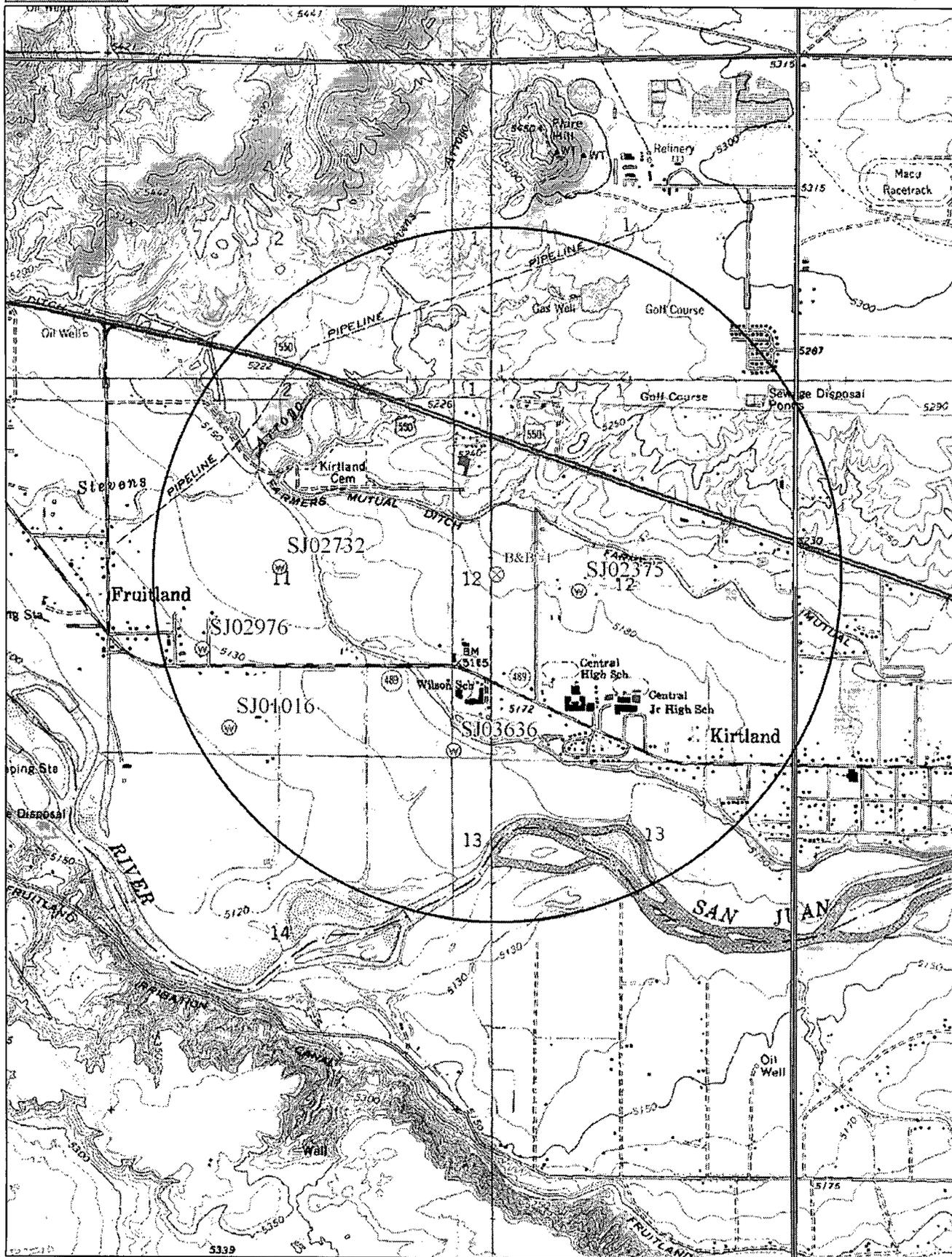
From NM State Engineers Office (As of 05/30/06)

Well #	Owner	T	R	S	Q	OO	E	N	DATE	DEPTH
*SJ 00225	JOSEPH S. LESTER	29N	15W	12	2	2	3	199784	4071786	110
*SJ 00291	DAVID R. KNOLL	29N	15W	12	2	1	199482	4071898	08/04/1977	08/11/1977
*SJ 00302	WALTER A. PRINCE	29N	15W	13	2	1	199526	4070385		
*SJ 00368	CHARLES A. RODERICK	29N	15W	11	3	1	197042	4071164		
*SJ 00582	DEREK WETHINGTON	29N	15W	13	2	2	199929	4070371		
*SJ 00608	FRIEDA FREEMAN	29N	15W	11	3	1	197042	4071164		
*SJ 01016	KEITH BURTON	29N	15W	11	3	4	197430	4070749	07/19/1979	07/22/1979
*SJ 01136	JOSEPH S. LESTER	29N	15W	12	2	2	199885	4071887	03/18/1980	03/26/1980
*SJ 01223	LODIS BAYLOCK	29N	15W	13	2	4	199012	4069898	07/19/1980	07/21/1980
*SJ 01569	INTRASTATE GATHERING	29N	15W	11	1	2	197470	4071959	05/25/1982	05/27/1982
*SJ 01837	GARY CLINE	29N	15W	11	1	1	197068	4071972		
*SJ 02010	LENORA M. HOGUE	29N	15W	11	1	3	197055	4071568	11/08/1985	11/09/1985
*SJ 02063	ALVIN HILT	29N	15W	11	1	3	197055	4071568	06/15/1986	06/17/1986
*SJ 02071	JOHN LEO KENNEDY	29N	15W	12	1	1	198775	4072019	10/29/1986	10/30/1986
*SJ 02081	DAN BOOTH	29N	15W	12	1	2	198775	4072019	11/10/1986	11/11/1986
*SJ 02165	GARY ALAN CLINE	29N	15W	11	1	1	196967	4072071	03/01/1988	03/05/1988
*SJ 02375	ANTHONY V. GRISOLANO	29N	15W	12	3	2	199052	4071104	01/18/1993	01/18/1993
*SJ 02732	JAMES L. SPURGEON	29N	15W	11	2	3	197859	4071543		
*SJ 02976	RON & KATHY WOODS	29N	15W	11	3	2	197343	4071051	01/21/2000	01/24/2000
*SJ 03449	JUDY KANNON	29N	15W	11	3	1	196941	4071263	03/15/2004	03/16/2004
*SJ 03462	LOWELL FINCH	29N	15W	11	3	1	196941	4071263	04/09/2004	04/10/2004
*SJ 03636	MLU ELLSWORTH	29N	15W	12	3	2	198735	4070813	07/08/2005	07/08/2005
*SJ 03671	KENNETH G. SMITH	29N	15W	13	2	4	199929	4070171	01/12/2006	01/13/2006

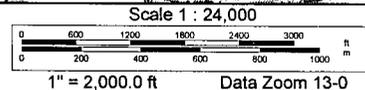
Record Count: 23

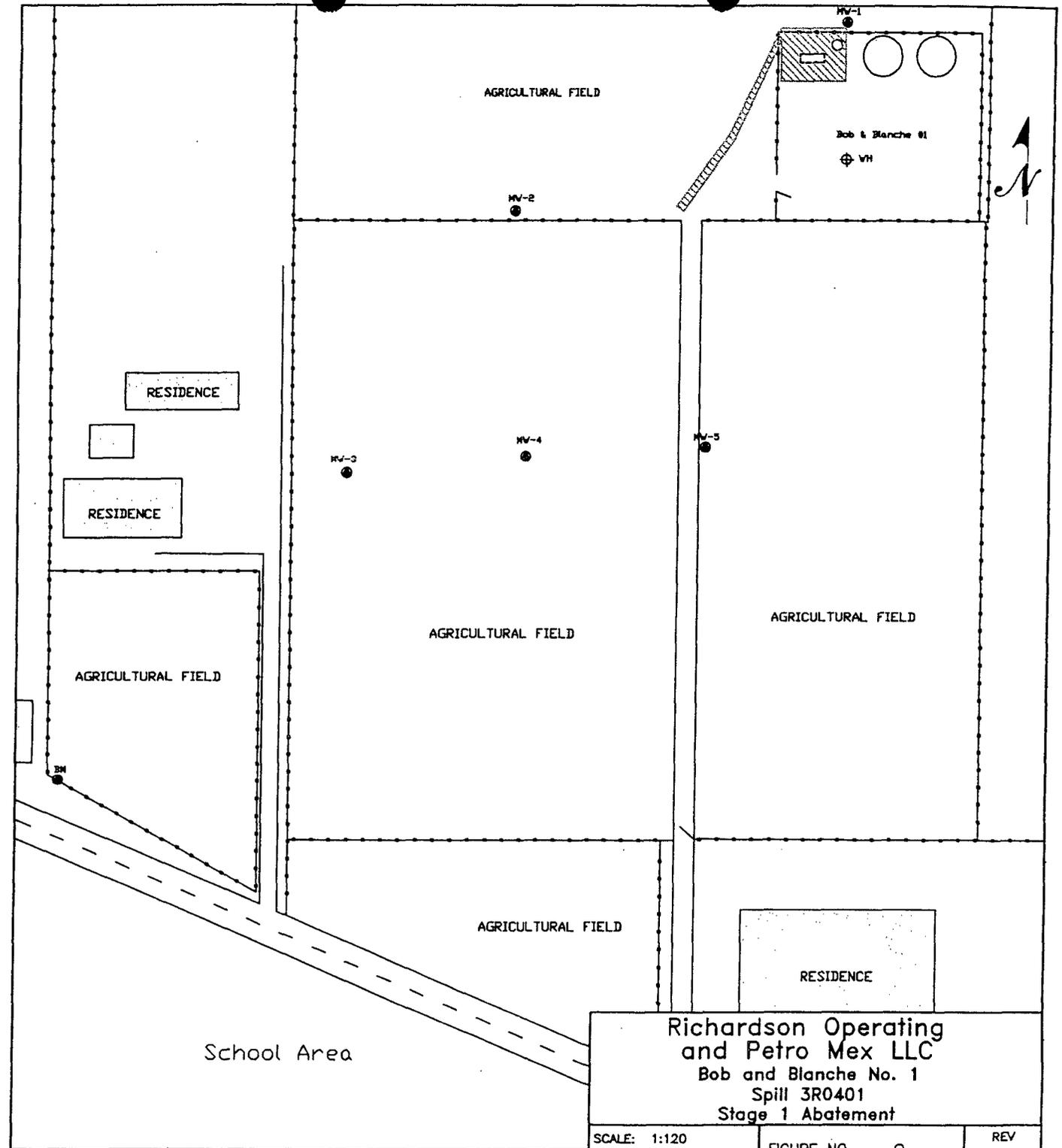
Q = quarter within section; 1 is largest & 4 is smallest

1=NW, 2=NE, 3=SW, 4=SE



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Richardson Operating  
and Petro Mex LLC  
Bob and Blanche No. 1  
Spill 3R0401  
Stage 1 Abatement

SCALE: 1:120      FIGURE NO. 2      REV  
PROJECT NO. 98094-009

REVISIONS			
NO.	DATE	BY	DESCRIPTION
MAP DRWN	SLC		01/26/06 BASE DRWN

**Legend**

- MW-4 ● Monitor Well
- ⊕ Wellhead
- ⊕ Bench Mark
- ▨ Excavated Spill Area
- Fence
- AST

ENVIRONMENTAL SCIENTISTS & ENGINEERS  
**ENVIROTECH**  
5796 U.S. HIGHWAY 64, FARMINGTON, NM 87401 505-632-0615

## **Bob and Blanche Monitoring Program:**

Every 90 days Richardson Operating company will monitor the ten selected wells for Benzene, Toluene, Ethylbenzene, p,m-Xylene and o-Xylene. At the end of the 90 day period richardson will submit the results and after 8 quarters will submit a final site investigation report. The submittal deadlines are as follows:

<b><u>Monitoring Period</u></b>	<b><u>Submittal Deadline</u></b>	<b><u>Document(s) Submitted</u></b>
8/1/2006 - 10/31/2006	11/1/2006	Progress Report 1
11/1/2006 - 1/31/2007	2/1/2007	Progress Report 2
2/1/2007 - 4/30/2007	5/1/2007	Progress Report 3
5/1/2007 - 7/31/2007	8/1/2007	Progress Report 4
8/1/2007 - 10/31/2007	11/1/2007	Progress Report 5
11/1/2007 - 1/31/2008	2/1/2008	Progress Report 6
2/1/2008 - 4/30/2008	5/1/2008	Progress Report 7
5/1/2008 - 7/31/2008	8/1/2008	Progress Report 8 & Final Site Investigation Report

## **Quality Assurance Plan**

In order to assure the quality of the samples taken the following measures will be taken. The sample procedure will follow USEPA SW-846 protocol. Water levels will be measured prior to bailing each well. A minimum of three (3) well volumes will be removed from each well prior to sampling using a new disposable bailer. Conductivity, pH, and temperature will be measured and recorded. Samples will be collected into 40 ml VOA vials with Teflon closures, preserved with HgCl<sub>2</sub>, capped headspace free, labeled, and stored on ice in an ice chest. Samples will be delivered to the laboratory for analysis using USEPA Method 8021B, Major Cations and Anions, Heavy Metals by USEPA Method 6010, and Polynuclear Aromatic Hydrocarbons (PAH's) by EPA Method 8100.



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

**CERTIFIED MAIL  
RETURN RECEIPT NO: 7923 4740**

August 4, 2006

Ms. Patty Davis  
Land Manager  
Richardson Operation Company  
5600 South Quebec  
Suite 130B  
Denver, CO 80111

Mr. Jesus Villalobos  
President  
PETRO MEX LLC  
P.O. Box 6724  
Farmington, NM 87499

**RE: BOB AND BLANCHE #1 MONITORING PLAN  
UNIT L, SECTION 12, TOWNSHIP 29 NORTH, RANGE 15 WEST, SAN JUAN  
COUNTY, NEW MEXICO  
AP040**

Dear Ms. Davis and Mr. Villalobos:

The New Mexico Oil Conservation Division (OCD) has reviewed the *Bob and Blanche #1 Monitoring Plan* jointly submitted by Richardson Operating (Richardson) and PETRO MEX LLC (PETRO MEX) on July 24, 2006. OCD denies the proposed plan because Richardson and PETRO MEX failed to submit the required Quality Assurance Plan (see item no. 3 of OCD's letter of May 10, 2006). OCD approves the five proposed water wells: SJ02732, SJ02375, SJ02976, SJ01016, and SJ03636. In addition to the five water wells, Richardson and PETRO MEX must also monitor the five Stage 1 monitor wells. If Richardson and PETRO MEX are denied permission to sample any of the five water wells by the well owners, then that information should be included in the quarterly monitoring report. Richardson must also copy the water well owners on each quarterly monitoring report and the final site investigation report.

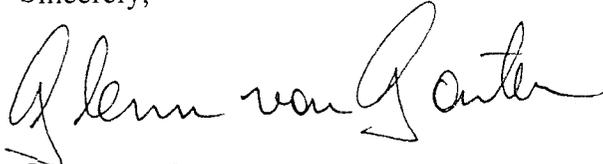
Ms. Davis and Mr. Villalobos

August 4, 2006

Page 2

Richardson and PETRO MEX must submit a revised monitoring plan within ten days from the receipt of this letter. Please note that Mr. Faust has retired from the OCD and has been replaced by Mr. Brandon Powell. Please call me at 505-476-3488 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Glenn von Gonten". The signature is written in black ink and is positioned above the typed name.

Glenn von Gonten  
Senior Hydrologist

xc: Brandon Powell, OCD Aztec District Office

2006 JUL 28 AM 11 21

AP 040



**RICHARDSON OPERATING COMPANY**

5600 South Quebec Street, Suite 130B  
Greenwood Village, CO 80111  
(303) 830-8000 Fax (303) 830-8009

July 24, 2006

New Mexico Energy, Minerals and Natural Resources Department  
1220 South St. Francis Drive  
Santa Fe, NM 87505

ATTN: Glenn von Gonten

**RE: BOB AND BLANCHE #1 MONITORING PLAN**

Dear Mr. von Gonten,

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Please refer to attached information for the following:

1. Inventory of water wells within one mile from the site
2. Water wells selected for monitoring
3. Monitoring Plan & Schedule (including submission deadline for quarterly reports and final site investigation)

Please call me at 303-830-8000 if you have any questions.

Sincerely,

John A. Heinle  
Land / Engineering

Xc: Denny Foust, OCD Aztec District Office  
Morris Young, Envirotech  
Jesus Villalobos, PETRO MEX LLC

### Richardson Operating Water Wells within 1 mile radius of Bob & Blanche #1

From NM State Engineers Office (As of 05/30/06)

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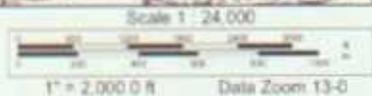
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 www.delorme.com



## **Bob and Blanche Monitoring Program:**

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2/1/2008 - 4/30/2008	5/1/2008	Progress Report 7
5/1/2008 - 7/31/2008	8/1/2008	Progress Report 8 & Final Site Investigation Report

**VonGonten, Glenn, EMNRD**

---

**From:** Patti Davis [pdavis@richardsonoil.com]  
**Sent:** Tuesday, July 18, 2006 3:10 PM  
**To:** VonGonten, Glenn, EMNRD  
**Cc:** Price, Wayne, EMNRD; Sanchez, Daniel J., EMNRD; Morris Young  
**Subject:** RE: Quarterly monitoring plan for Bob & Blanche Spill site

John Heinle has been in contact with EnviroTech for several months developing a monitoring program. Per Morris Young, the hold up has been with the OCD confirming which water wells require monitoring.

Please contact Enviro Tech to clarify any misunderstanding in this regard. By copy of this email, I am requesting that Morris Young also follow-up with your office on this issue.

Thank you for your assistance in this matter.

**Patti L. Davis, CPL**

Vice President / Land Manager  
Richardson Operating Company  
Knighten Well Service, LLC  
Sage Drilling, LLC  
Chihuahua Drilling, LLC  
(303) 830-8000  
Fax (303) 830-8009  
5600 S. Quebec St., Suite 130-B  
Greenwood Village, CO 80111

---

**From:** VonGonten, Glenn, EMNRD [mailto:Glenn.VonGonten@state.nm.us]  
**Sent:** Tuesday, July 18, 2006 10:05 AM  
**To:** Patti L. Davis  
**Cc:** Price, Wayne, EMNRD; Sanchez, Daniel J., EMNRD  
**Subject:** Quarterly monitoring plan for Bob & Blanche Spill site

Dear Ms. Davis:

On May 10, 2006, OCD sent you a letter requiring Richardson and PetroMex to submit a quarterly monitoring plan for the Bob & Blanche site within 30 days as well as several other tasks. To date, OCD has not received this plan. This is a final reminder; if OCD does not receive the required quarterly monitoring plan by July 25, 2006, then OCD may take appropriate enforcement actions to bring Richardson into compliance.

If you have any questions, please call me at 505-476-3488.

Glenn von Gonten

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient (s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.

8/4/2006

**VonGonten, Glenn, EMNRD**

---

**From:** VonGonten, Glenn, EMNRD  
**Sent:** Tuesday, July 18, 2006 10:05 AM  
**To:** Patti L. Davis  
**Cc:** Price, Wayne, EMNRD; Sanchez, Daniel J., EMNRD  
**Subject:** Quarterly monitoring plan for Bob & Blanche Spill site

Dear Ms. Davis:

On May 10, 2006, OCD sent you a letter requiring Richardson and PetroMex to submit a quarterly monitoring plan for the Bob & Blanche site within 30 days as well as several other tasks. To date, OCD has not received this plan. This is a final reminder; if OCD does not receive the required quarterly monitoring plan by July 25, 2006, then OCD may take appropriate enforcement actions to bring Richardson into compliance.

If you have any questions, please call me at 505-476-3488.

Glenn von Gonten



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

**CERTIFIED MAIL  
RETURN RECEIPT NO: 7923 4719**

May 10, 2006

Ms. Patty Davis  
Land Manager  
Richardson Operation Company  
5600 South Quebec  
Suite 130B  
Denver, CO 80111

Mr. Jesus Villalobos  
President  
PETRO MEX LLC  
P.O. Box 6724  
Farmington, NM 87499

**RE: STAGE 1 ABATEMENT PLAN REPORT  
BOB AND BLANCHE No. 1 SPILL  
UNIT L, SECTION 12, TOWNSHIP 29 NORTH, RANGE 15 WEST, SAN JUAN  
COUNTY, NEW MEXICO  
AP040**

Dear Ms. Davis and Mr. Villalobos:

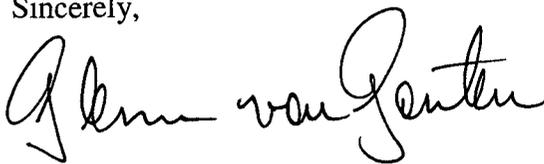
The New Mexico Oil Conservation Division (OCD) has reviewed the Stage 1 Abatement Plan Report jointly submitted on February 15, 2006, by Richardson Operating (Richardson) and PETRO MEX LLC (PETRO MEX). The Stage 1 Report indicates that the new monitoring wells have not been impacted by petroleum hydrocarbon contamination at this time; therefore, OCD is not requiring Richardson and PETRO MEX to submit a Stage 2 Abatement Plan at this time. The Stage 1 Report also indicates that at least two nearby water wells were not sampled because the owners were not contacted and that Richardson and PETRO MEX did not complete several tasks that were specified in the Stage 1 Work Plan.

OCD hereby requires Richardson and PETRO MEX to complete the following tasks within 30 days.

1. Submit the inventory of water wells inside and within one (1) mile from the site.
2. Contact the owners of water wells as determined from the inventory and request permission to sample wells. Obtain samples from nearby water wells, analyze samples, and provide written report to OCD within 30 days.
3. Submit quarterly monitoring plan for BTEX only with previously required quality assurance plan. Richardson and PETRO MEX shall implement quarterly monitoring program until it has demonstrated compliance with ground water standards for a minimum of eight quarters.
4. Submit schedule with quarterly monitoring plan for all remaining Stage 1 activities, including quarterly progress reports, and a detailed final site investigation report documenting the results of both on-site and off-site activities.

Please call me at 505-476-3488 if you have any questions.

Sincerely,

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Glenn von Gonten  
Senior Hydrologist

xc: Denny Foust, OCD Aztec District Office  
Tim Foster, Kirtland, NM



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

**CERTIFIED MAIL  
RETURN RECEIPT NO: 7923 4726**

May 10, 2006

Ms. Patty Davis  
Land Manager  
Richardson Operation Company  
5600 South Quebec  
Suite 130B  
Denver, CO 80111

Mr. Jesus Villalobos  
President  
PETRO MEX LLC  
P.O. Box 6724  
Farmington, NM 87499

**RE: STAGE 1 ABATEMENT PLAN REPORT  
BOB AND BLANCHE No. 1 SPILL  
UNIT L, SECTION 12, TOWNSHIP 29 NORTH, RANGE 15 WEST, SAN JUAN  
COUNTY, NEW MEXICO  
AP040**

Dear Ms. Davis and Mr. Villalobos:

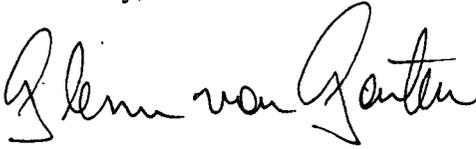
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Sincerely,



Glenn von Gonten  
Senior Hydrologist

xc: Denny Foust, OCD Aztec District Office  
Tim Foster, Kirtland, NM

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

January 6, 2006

RECEIVED

Mr. Jesus Villalobos  
President  
Petro Mex LLC  
P.O. Box 6724  
Farmington, NM 87401

JAN 9 2006

Phone: (505) 330-2467

Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

**RE: CLARIFICATION OF THE BOB & BLANCHE NO. 1 ABATEMENT PLAN**

Dear Mr. Villalobos,

As a result of our correspondence on January 5, 2006 concerning the Bob & Blanche No. 1 Abatement Plan, I was contacted by a Richardson Representative, Mr. John Heinle. Mr. Heinle informed Envirotech that he has tried to contact Mr. Tim Foster several times and left several messages to return calls.

Mr. Heinle, furthermore informed me that he has been in contact with Mr. Tim Foster on January 5, 2006 and that he is looking forward to working out the details in implementing this abatement plan with Mr. Foster and PETRO MEX. He stated that Richardson is anxious to proceed and will cooperate in anyway possible, but since PETRO MEX is the Owner of Record, it therefore has the primary responsibility to take the lead and implement the plan.

Thank you for you attention in helping resolve these issues in implementing this abatement plan. If you have additional questions, please do not hesitate to give me a call at (505) 632-0615.

Sincerely,



Morris D. Young,  
President  
[myoung@envirotech-inc.com](mailto:myoung@envirotech-inc.com)

cc: Tim Foster, Land Owner  
Denny Foust, NMOCD  
Glenn von Gonten, NMOCD  
John Heinle, Richardson Operating Co.

MDY: ib/office/client/drill/richardsonoperating/010506timfosterletter.doc

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

January 5, 2006

RECEIVED

Mr. Jesus Villalobos  
President  
Petro Mex LLC  
P.O. Box 6724  
Farmington, NM 87401

JAN 9 2006

Phone: (505) 330-2467

Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

RE: BOB & BLANCHE NO. 1 ABATEMENT PLAN

Dr. Mr. Villalobos,

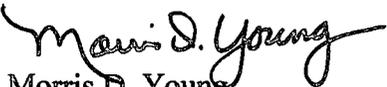
Envirotech understands that the Abatement Plan for the Bob & Blanche No. 1 has been approved by NMOCD, but Envirotech never received a copy of that approval. Therefore, we don't know if any of the proposed conditions have changed. Based on our understanding that there was an approved plan, on January 5, 2006, we contacted Mr. Tim Foster, land owner of the Bob & Blanche #1, to inform him we were ready to proceed with the abatement plan work.

Mr. Foster stated that he is the property owner and that he is upset that he has not been contacted by New Mexico Oil Conservation Division ("OCD"), Petro Mex LLC ("Petro Mex"), or Richardson Operating Company ("Richardson"), therefore he will not grant access to the property. This makes it impossible to proceed with the abatement plan. It is our understanding that Mr. Foster's concern is the lack of any written agreement regarding the surface damages resulting from the previous abatement work and the work yet to be completed.

I have personally requested that Richardson, Petro Mex and the NMOCD each contact the property owner, but it appears that none of the three parties are interested in proceeding with this abatement plan.

Thank you for your prompt attention to this matter, please advise us as to when to proceed with the abatement plan. If you have additional questions, please do not hesitate to give me a call at (505) 632-0615.

Sincerely,



Morris D. Young,  
President  
[myoung@envirotech-inc.com](mailto:myoung@envirotech-inc.com)

cc: Tim Foster, Land Owner  
Denny Foust, NMOCD  
Glenn von Gonten, OCD  
John Heinle, Richardson Operating Co.

MDY: ib/office/client/drill/richardsonoperating/010506timfosterletter.doc

# BJORK ♦ LINDLEY ♦ LITTLE ♦ PC

LAWYERS

2005 DEC 29 PM 12 20

PETER A. BJORK\*  
LAURA LINDLEY  
DAVID R. LITTLE  
KURT M. PETERSEN  
ROBERT C. MATHES\*  
DARIN B. SCHEER\*  
KATHLEEN S. CORR  
JILL D. CANTWAY  
CHRISTOPHER G. HAYES\*  
ANN M. EASTBURN\*

\*Of Counsel  
\*Special Counsel  
\*Also admitted in Wyoming  
\*Also admitted in the District of Columbia

December 22, 2005

## *Via Overnight Mail*

Mr. Jesus Villalobos  
President  
Petro Mex LLC  
P.O. Box 6724  
Farmington, NM 87499

Re: Bob and Blanche No. 1 Abatement Liability

Dear Mr. Villalobos,

As you know from our prior letter dated November 30, 2005, we represent Richardson Operating Company ("Richardson") in connection with the Bob and Blanche No. 1 well ("Well") located in San Juan County, New Mexico. To date, neither you nor your attorney has responded to our letter. If you are represented by an attorney, we ask that you immediately forward a copy of this letter to your counsel and provide us with their contact information so we may communicate with them directly.

In our letter dated November 30, 2005, we discussed the assignment by Richardson of its interest in the Well and certain other wells to Petro Mex LLC ("Petro Mex") under the Assignment, Conveyance, Quit-Claim and Bill of Sale ("Assignment"), dated June 8, 2005, but effective June 1, 2005. We also discussed the fact that the Change of Operator was approved by the New Mexico Oil Conservation Division ("OCD") with an effective date of June 8, 2005, concurrent with the date of the Assignment. Copies of the Assignment and the Change of Operator were enclosed with our letter.

As we discussed in our November 30 letter, a discharge occurred from the Well on or about June 18, 2005 (the "Incident"), during the period after the effective date of the Assignment and after the effective date of the Change of Operator. Accordingly, Petro Mex is solely liable for the Incident as owner and operator of the Well.

Although Richardson undertook the initial response to the Incident as the contract operator on behalf of Petro Mex, the purpose of our November 30 letter was to demand

Mr. Jesus Villalobos

December 22, 2005

Page 2

reimbursement for the costs incurred by Richardson to date in this matter and to require Petro Mex to acknowledge its sole responsibility for all future costs. Petro Mex has offered no response to our November 30 letter, despite the specific deadlines set forth therein.

Given your lack of response, the purpose of this letter is twofold. First, Richardson hereby formally notifies you that the proposed abatement plan regarding the Incident was approved by the OCD earlier this month. Because we only have 90 days to fulfill the requirements of the abatement plan and the OCD is, for the moment, holding Richardson and Petro Mex jointly responsible for this matter, Richardson intends to initiate the procedures outlined in the abatement plan. However, by moving forward with the required abatement procedures, Richardson is not in any way waiving or foreclosing its ability to seek reimbursement from Petro Mex for the full amount of all costs incurred by Richardson with respect to the Incident. If you have any comments or concerns about Richardson's intention to proceed with the abatement procedures as outlined in the plan approved by the OCD, please provide a specific written response outlining your concerns on or before **December 30, 2005**.

The second purpose of this letter is to notify you that, by your lack of prior response, Richardson must assume that you do not intend to voluntarily honor your legal obligation to bear the cost of all remediation efforts resulting from the Incident. Accordingly, unless you (i) contact Richardson to negotiate a payment plan; and (ii) provide written acknowledgement of your responsibility for all costs arising from the Incident, on or before **December 30, 2005**, Richardson will assume it has no choice but to commence a court action to enforce its right to reimbursement by Petro Mex.

Sincerely,

BJORK LINDLEY LITTLE PC



David R. Little  
Darin B. Scheer

cc: Roger Anderson  
Glenn Von Gonten  
Denny Foust  
Brian Harrington  
Envirotech  
Client

**AFFIDAVIT OF PUBLICATION**

**Ad No. 52681**

**STATE OF NEW MEXICO  
County of San Juan:**

CONNIE PRUITT, being duly sworn says:  
That she is the ADVERTISING MANAGER of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication and appeared in the Internet at The Daily Times web site on the following day(s):

Thursday, December 15, 2005.

And the cost of the publication is \$67.32.

Connie Pruitt

ON 12/19/05 CONNIE PRUITT appeared before me, whom I know personally to be the person who signed the above document.

Wynell Corey  
My Commission Expires November 17, 2008



**COPY OF PUBLICATION**

918 Legals

**NOTICE OF PUBLICATION**

**STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION**

Notice is hereby given that pursuant to New Mexico Water Quality Control Regulations, the following Stage 1 Abatement Plan Proposal has been submitted to the Director of the Oil Conservation Division, 1220 St. Francis Dr., Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

Dennis Riding of Maverik Country Stores, Inc., Telephone (801) 936-5557, 880 West Center Street, North Salt Lake, UT 84054-2913, has submitted a Stage 1 Abatement Plan Proposal to investigate ground water contamination at its former Maverik (Caribou) Refinery, located in Unit L, Section 12, Township 29 North, Range 15 West, San Juan County, New Mexico. The Stage 1 Abatement Plan Proposal specifies that Maverik Country Stores, Inc. will: conduct a ground water investigation; conduct an irrigation ditch field survey; conduct a private well ownership and construction survey; conduct a slurry wall integrity demonstration; and, submit an investigation report.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The Stage 1 Abatement Plan Proposal may be viewed at the above address or at the Oil Conservation Division Aztec District Office, 1000 Rio Brazos Road, Aztec, New Mexico 87410, Telephone (505) 334-6178, between 8:00 a.m. and 4:00 p.m., Monday through Friday. The draft discharge permit may also be viewed at OCD's web site <http://www.emnrd.state.nm.us/ocd/>. Prior to ruling on the proposed Stage 1 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow at least 30 days from the date of publication of this notice for the submittal of written comments.

Legal No. 52681 published in The Daily Times, Farmington, New Mexico on Thursday, December 15, 2005.

RECEIVED  
DEC 19 2005  
OIL CONSERVATION  
DIVISION

NM OIL CONSERVATION DIV

ATTN: Ed Martin  
1220 ST. FRANCIS DR  
ATT MARY ANAYA  
SANTA FE NM 87505

ALTERNATE ACCOUNT: 56689  
AD NUMBER: 00150000 ACCOUNT: 00002212  
LEGAL NO: 78133 P.O. #: 06-199-050125  
153 LINES 1 TIME(S) 85.68  
AFFIDAVIT: 5.50  
TAX: 6.90  
TOTAL: 98.08

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO  
COUNTY OF SANTA FE

I, R. Lara, being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 78133 a copy of which is hereto attached was published in said newspaper 1 day(s) between 12/15/2005 and 12/15/2005 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 15th day of December, 2005 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/ R. Lara  
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 15th day of December, 2005

Notary Laura E. Harding

Commission Expires: 11/23/07



**NOTICE OF PUBLICATION**

**STATE OF  
NEW MEXICO  
ENERGY, MINERALS  
AND NATURAL  
RESOURCES  
DEPARTMENT  
OIL CONSERVATION  
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<http://www.emnrd.state.nm.us/ocd/>. Prior to ruling on the proposed Stage 1 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow at least 30 days from the date of publication of this notice for the submittal of written comments.  
Legal #78133  
Pub. December 15, 2005



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**  
Governor  
**Joanna Prukop**  
Cabinet Secretary

**Mark E. Fesmire, P.E.**,  
Director  
Oil Conservation Division

**CERTIFIED MAIL**  
**RETURN RECEIPT NO: 7923 4696**

December 12, 2005

Ms. Patty Davis  
Land Manager  
Richardson Operation Company  
5600 South Quebec  
Suite 130B  
Denver, CO 80111

Mr. Jesus Villalobos  
President  
PETRO MEX LLC  
P.O. Box 6724  
Farmington, NM 87499

**RE: APPROVAL OF STAGE 1 ABATEMENT PLAN PROPOSAL**  
**BOB AND BLANCHE No. 1 SPILL**  
**AP040**

Dear Mr. Heinle and Villalobos:

On October 7, 2005, Richardson Operating (Richardson) and PETRO MEX LLC (PETRO MEX), jointly submitted a Stage 1 abatement plan proposal for the investigation of the extent of contamination released during a spill of oil, sediment, and produced water at the Bob and Blanche No. 1 tank battery, located in Unit L, Section 12, Township 29 North, Range 15 West, San Juan County, New Mexico. On October 18, 2005, the New Mexico Oil Conservation Division (OCD) determined that the proposed Stage 1 abatement plan proposal was administratively complete and required Richardson and PETRO MEX to issue a notice of publication in the Santa Fe New Mexican, the Farmington Daily Times, and certain interested persons and to provide proof of publication and proof of written notice to OCD.

As required, Richardson and PETRO MEX mailed copies of the notice to interested persons on October 21, 2005 and ran legal notices in the Farmington Daily Times and Santa Fe New Mexican on October 26, 2005 and October 27, 2005, respectively. During the public comment period,

Richardson and PETRO MEX Richardson received two telephone calls inquiring about the location of the spill. OCD received one written request for additional information. No comments that would require any revisions to the Stage 1 abatement plan were received during the public comment period.

After conducting a technical review, and as required by OCD Rule 19H, OCD approves of the Stage 1 abatement plan with the following conditions:

1. All monitor wells shall be constructed with fifteen (15) feet of well screen, with at least five (5) feet of the well screen above the water table and ten (10) feet of well screen below the water table.
2. The proposed location for the background monitor well is immediately adjacent to the spill site. Because of the possibility that this proposed location may already be contaminated, OCD requires that the background monitor well be located farther to the north and east, along the fence line.
3. A final ground water investigation report shall be submitted to OCD within 90 days of Richardson and PETRO MEX receipt of OCD's approval of the Stage 1 abatement plan.
4. Richardson and PETRO MEX shall copy OCD's Aztec district office on all correspondence, work plans, reports, *etc.*

If you have any questions, please call Glenn von Gonten at (505) 476-3488.

Sincerely,



Roger C. Anderson  
Environmental Bureau Chief

xc: Denny Foust, OCD Aztec District Office  
Jack Collins, Envirotech Inc.



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

**CERTIFIED MAIL  
RETURN RECEIPT NO: 7923 4689**

December 12, 2005

Ms. Patty Davis  
Land Manager  
Richardson Operation Company  
5600 South Quebec  
Suite 130B  
Denver, CO 80111

Mr. Jesus Villalobos  
President  
PETRO MEX LLC  
P.O. Box 6724  
Farmington, NM 87499

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BOB AND BLANCHE No. 1 SPILL  
AP040**

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4. Richardson and PETRO MEX shall copy OCD's Aztec district office on all correspondence, work plans, reports, *etc.*

If you have any questions, please call Glenn von Gonten at (505) 476-3488.

Sincerely,



Roger C. Anderson  
Environmental Bureau Chief

xc: Denny Foust, OCD Aztec District Office  
Jack Collins, Envirotech Inc.

# BJORK ♦ LINDLEY ♦ LITTLE ♦ PC

LAWYERS

PETER A. BJORK<sup>†</sup>  
LAURA LINDLEY  
DAVID R. LITTLE  
KURT M. PETERSEN  
ROBERT C. MATHES<sup>\*</sup>  
DARIN B. SCHEER<sup>†</sup>  
KATHLEEN S. CORR  
JILL D. CANTWAY  
CHRISTOPHER G. HAYES<sup>\*</sup>  
ANN M. EASTBURN<sup>\*</sup>

<sup>\*</sup>Of Counsel  
<sup>†</sup>Special Counsel  
<sup>\*</sup>Also admitted in Wyoming  
<sup>\*</sup>Also admitted in the District of Columbia

November 30, 2005

*Via Overnight Mail*

Mr. Jesus Villalobos  
President  
Petro Mex LLC  
P.O. Box 6724  
Farmington, NM 87499

Re: Bob and Blanche No. 1 Spill

Dear Mr. Villalobos,

We represent Richardson Operating Company ("Richardson") in connection with the Bob and Blanche No. 1 well ("Well") located in San Juan County, New Mexico. If you are represented by an attorney, we ask that you immediately forward a copy of this letter to your counsel and provide us with their contact information so we may communicate with them directly.

As you know, Richardson assigned, conveyed, and quitclaimed 100% of its interest in the Well and certain other wells to Petro Mex LLC ("Petro Mex") in the attached Assignment, Conveyance, Quit-Claim and Bill of Sale ("Assignment"), dated **June 8, 2005**, but effective **June 1, 2005**. Due to the delay by Petro Mex in posting the required bond,<sup>1</sup> the Change of Operator reflecting this Assignment was not approved by the New Mexico Oil Conservation Division ("OCD") until September 1, 2005. However, the Change of Operator had an effective date of **June 8, 2005**, concurrent with the date of the Assignment. A copy of the Change of Operator is enclosed for your convenience.

As you are aware, due to apparent intentional vandalism by an unknown party, a discharge occurred from the Well on or about **June 18, 2005** (the "Incident"), during the period

<sup>1</sup> Pursuant to the terms of the letter agreement conveying the Well ("Letter Agreement"), dated June 8, 2005, Petro Mex represented that it was a bonded operator in New Mexico, and agreed to furnish evidence of such bonding to Richardson on or before June 15, 2005. Although Petro Mex immediately began exercising the privileges of ownership under the Letter Agreement by selling certain assets conveyed by the Assignment, Petro Mex failed to provide evidence of sufficient bonding until late August 2005, despite repeated requests by Richardson.

RECEIVED

DEC 5 - 2005

OIL CONSERVATION  
DIVISION

after the effective date of the Assignment and after the effective date of the Change of Operator, but prior to the final approval of the Change of Operator by the OCD. Pursuant to the effective date of the Assignment and the effective date of the Change of Operator, Petro Mex is solely liable for the Incident as owner and operator of the Well.

Nevertheless, because the Incident occurred during the period in which Richardson was still operating the Well as contract operator for Petro Mex while awaiting final approval of the Change of Operator by the OCD, Richardson undertook the initial response to the Incident and began containment and remediation procedures immediately in the interest of protecting the public and maintaining a good relationship with the OCD on behalf of both Richardson and Petro Mex. However, while Richardson initiated the remediation response on behalf of Petro Mex as a good corporate citizen and because it was still the operator of record with the OCD pending approval of the Change of Operator, those actions in no way waived or diminished Richardson's right to seek full reimbursement of these remediation costs from Petro Mex as the actual owner of the Well and sole responsible party.

This letter confirms Richardson's understanding that Petro Mex is solely responsible for all liabilities associated with the Incident, including the responsibility to reimburse Richardson for all remediation costs incurred to date on behalf of Petro Mex in connection with the Incident. Although Richardson was willing to incur the initial costs on behalf of Petro Mex in an attempt to limit the amount of damage from the incident, the time has come for Petro Mex to fulfill its existing reimbursement obligation and its ongoing remediation responsibilities with regard to the Well.

Richardson has kept Petro Mex fully apprised of this situation from the very beginning, transferring all files in Richardson's possession pertaining to the Well and writing and calling Petro Mex repeatedly over the last several months to update you on the status of the remediation efforts. Richardson now respectfully requests that Petro Mex fulfill its reimbursement obligation by repaying Richardson on or before December 9, 2005, ("Repayment Deadline") the total amount of **\$89,159.04**, representing the costs incurred to date by Richardson on behalf of Petro Mex in response to the Incident. Copies of any invoices not previously provided to Petro Mex for these services will be forwarded shortly.

Richardson also respectfully requests that Petro Mex send a letter to the OCD by December 6, 2005 ("OCD Notification Deadline"), acknowledging that Petro Mex was the owner of the Well on the date of the Incident based on the effective date of the Assignment, and is therefore solely responsible for any and all liabilities arising from the ownership and operation of the Well on the date of the Incident. Richardson will also expect Petro Mex to timely forward copies of any additional correspondence between the OCD and Petro Mex regarding this Well.

As you know, Envirotech, the environmental consulting company hired on behalf of Petro Mex, has prepared a proposed abatement plan which is currently undergoing public review, and the OCD will begin its formal review of that proposed abatement plan within a few weeks. Petro Mex needs to enter into a formal contract with Envirotech as the party responsible for the

Mr. Jesus Villalobos

November 30, 2005

Page 3

ongoing abatement work. Please provide Richardson with a copy of the executed contract between Petro Mex and Envirotech **no later than December 9, 2005**. Richardson will also expect Petro Mex to timely forward copies of any additional correspondence between Envirotech and Petro Mex regarding this Well.

Finally, you have indicated your intention to submit a claim to your insurance company regarding the Well. Please provide written evidence that you have filed such a claim **no later than December 9, 2005**, together with copies of all correspondence to date between Petro Mex and any insurance company regarding the Well. Richardson will also expect Petro Mex to timely forward copies of any additional correspondence between the Petro Mex and its insurer regarding this Well.

Richardson appreciates your willingness to honor your responsibilities with regard to the Well, and looks forward to putting this issue to rest and moving forward with future business dealings with both Petro Mex and the State of New Mexico. However, if Petro Mex fails or refuses to meet the Repayment Deadline and/or the OCD Notification Deadline, Richardson will have no other choice but to take further action to enforce its right to reimbursement and to establish Petro Mex's liability for the costs incurred in this matter.

If you have any questions or require additional information regarding this matter, please do not hesitate to have your attorney contact our office.

Sincerely,

BJORK LINDLEY LITTLE PC



Darin B. Scheer

cc: Roger Anderson  
Glenn Von Gonten  
Denny Foust  
Brian Harrington  
Client



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**  
Governor  
**Joanna Prukop**  
Cabinet Secretary

**Mark E. Fesmire, P.E.**  
Director  
Oil Conservation Division

November 16, 2005

Roland E. and Gloria S. Jackson  
20 Road 6271  
Kirtland, NM 87417-9773

**RE: STAGE 1 ABATEMENT PLAN PROPOSAL  
BOB AND BLANCHE NO. 1 SPILL  
UNIT L, SECTION 12, TOWNSHIP 29 NORTH, RANGE 15 WEST  
SAN JUAN COUNTY, NEW MEXICO  
AP040**

Dear Mr. and Ms. Jackson:

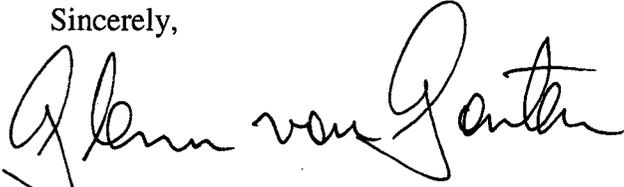
Mr. Fesmire asked me to respond to your letter of November 8, 2005, in which you express interest in the ongoing abatement process at the Bob and Blanche No. 1 spill located in Kirtland, New Mexico. As a result of a spill of oil, sediment, and produced water on June 18, 2005, at the Richardson Operating Company - Bob and Blanche No. 1 tank battery, the Oil Conservation Division (OCD) has required the two responsible persons, Richardson Operating Company and PETRO MEX to submit an Abatement Plan to define the ground water contamination. After the ground water contamination has been defined, OCD will require that the contaminated ground water be appropriately remediated to state standards.

As part of the public notice requirements, Richardson and PETRO MEX were required to provide all persons living within one mile from the release with a written copy of the public notice, as well as provide notice in the newspaper. As stated in the notice, any interested person, such as you, may submit written comments to OCD during the 30-day public comment period. After the close of the public comment period, OCD will consider all public comments before making a final decision to approve or deny the Stage 1 Abatement Plan proposal. Please feel free to provide OCD with any comments or concerns that you may have.

A similar process is currently being followed at the former Maverik Caribou Refinery. As a result of the sampling results from your water well, OCD has required Maverik to submit a Stage 1 Abatement Plan proposal, which OCD is presently reviewing for administrative completeness.

OCD anticipates that Maverik will provide public notice about its Abatement Plan proposal soon. OCD will require Maverik to follow the same Public Notice processes as with the Bob and Blanche release site. If you have any questions, please call me at 505-476-3488.

Sincerely,

A handwritten signature in cursive script that reads "Glenn von Gonten". The signature is written in black ink and is positioned above the printed name.

Glenn von Gonten  
Senior Hydrologist

xc: Denny Foust, OCD Aztec District Office

Mr. Fesmire,

11/8/2005

From information received so far about this spill and the contamination of the water table I and my wife would appreciate being kept updated. We do own property in the effected area and are concerned about the property value being affected. Please advise.

Roland E. and Gloria S. Jackson  
505-598-5955

RECEIVED

NOV 15 2005

OIL CONSERVATION  
DIVISION

NOTICE OF PUBLICATION

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

*just for SMIRE*

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following Stage 1 Abatement Plan Proposal has been submitted to the Director of the Oil Conservation Division, 1220 St. Francis Dr., Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

Patti Davis, Richardson Operating Company, Telephone (303) 830-8000, 5600 South Quebec, Suite 130B Denver, CO 80111, and Mr. Jesus Villalobos, President, PETRO MEX LLC (PETRO MEX), Telephone (505) 330-2467, P.O. Box 6724, Farmington, NM 87499, have jointly submitted a Stage 1 Abatement Plan Proposal to investigate ground water contamination released during a spill of oil, sediment, and produced water on June 18, 2005, at the Richardson Operating Company - Bob and Blanche No. 1 tank battery site, located in Unit L, Section 12, Township 29 North, Range 15 West, San Juan County, New Mexico. Richardson Operating was the operator of record at the time that the spill occurred and began the soil and ground water investigation and remediation. Richardson Operating removed approximately 1192 cubic yards of contaminated soil and 160 barrels of contaminated ground water from the site. Richardson Operating determined that the ground water at the site has been contaminated by benzene and xylenes at concentrations that exceed the New Mexico Water Quality Control Commission standards (see 20.6.2.3103(A) NMAC). PETRO MEX is the current operator of the site. Both parties jointly submitted a change of operator form that makes the operator change from Richardson Operating to PETRO MEX retroactive to June 8, 2005, a date that precedes the spill. Therefore, both Richardson Operating and PETRO MEX are responsible parties for the site. The Stage 1 Abatement Plan Proposal specifies that Richardson Operating and PETRO MEX will: make public notice and provide for public participation; investigate the ground water contamination at the site by advancing soil borings, installing monitor wells, monitoring and analyzing ground water; determine the geology and hydrogeology of the site; and, submit an investigation report.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The Stage 1 Abatement Plan Proposal may be viewed at the above address or at the Oil Conservation Division Aztec District Office, 1000 Rio Brazos Road, Aztec, New Mexico 87410, Telephone (505) 334-6178, between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on the proposed Stage 1 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow at least 30 days from the date of publication of this notice for the submittal of written comments.



RECEIVED

**RICHARDSON OPERATING COMPANY**

5600 South Quebec Street, Suite 130B  
Greenwood Village, CO 80111  
(303) 830-8000 Fax (303) 830-8009

NOV 02 2005

Oil Conservation Division  
Environmental Programs

October 31, 2005

VIA FEDERAL EXPRESS

Mr. Glenn von Gonten  
New Mexico Energy, Minerals and Natural Resources  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

RE: Public Notice Requirements

Dear Mr. von Gonten:

Enclosed are Affidavits of Mailing and Affidavits of Publication as required by your letter dated October 18, 2005.

The enclosed documents were faxed to your office this morning. Please feel free to contact me in the event you have additional questions.

Sincerely yours,

**RICHARDSON OPERATING COMPANY**

Patti L. Davis, CPL  
Land Manager

/pld

Enclosures

cc: Jesus Villalobos, Petro Mex, LLC  
(with attachments)

**FACSIMILE COVER SHEET**

**RICHARDSON OPERATING COMPANY**

5600 S. Quebec St., Suite 130-B  
Greenwood Village, CO 80111  
Phone: (303) 830-8000  
Fax: (303) 830-8009

TO: Glenn Von Gotten

COMPANY: New Mexico OCD

FROM: John Heinle

DATE: 10/31/2005

FAX NUMBER: (505) 476-3462

PHONE:

MESSAGE: Glenn here is the affidavit of mailing along with the affidavit of publication, please let me know if you need anything else.

Thank you

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> Call Me       | <input type="checkbox"/> F.Y.I.            | <input type="checkbox"/> For Your Approval    |
| <input type="checkbox"/> Urgent        | <input type="checkbox"/> By Your Request   | <input type="checkbox"/> Per Our Conversation |
| <input type="checkbox"/> Did You Know? | <input type="checkbox"/> Call upon receipt | <input type="checkbox"/> Comments Requested   |

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NUMBER OF PAGES INCLUDING THIS COVER PAGE: <sup>18</sup>~~17~~

STATE OF COLORADO §  
  §  
COUNTY OF ARAPAHOE §

**AFFIDAVIT OF MAILING**

Patti L. Davis, of lawful age, being first duly sworn upon her oath, states, and declares:

That she is employed by Richardson Operating Company as Land Manager; and

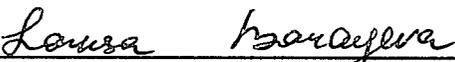
That the "Notice of Publication" attached hereto as Exhibit "A" was mailed to the individuals, firms and corporations set forth on Exhibit "B" attached hereto on this 21<sup>st</sup> day of October, 2005; and

That the notices were mailed in compliance with requirements set forth in that certain letter dated October 18, 2006 from Glenn von Gonten, Senior Hydrologist with the Oil Conservation Division of the Energy, Minerals and Natural Resources Department in and for the State of New Mexico.

Further affiant saith not.

  
Patti L. Davis

Subscribed and sworn to before me by Patti L. Davis this 21<sup>st</sup> day of October, 2005.

  
Notary Public

LARISA BARAYEVA  
NOTARY PUBLIC  
STATE OF COLORADO  
My Commission Expires 06/27/2009

## **EXHIBIT "A"**

### **NOTICE OF PUBLICATION**

#### **STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION**

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following Stage 1 Abatement Plan Proposal has been submitted to the Director of the Oil Conservation Division, 1220 St. Francis Dr., Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

Patti Davis, Richardson Operating Company, Telephone (303) 830-8000, 5600 South Quebec, Suite 130B Denver, CO 80111, and Mr. Jesus Villalobos, President, PETRO MEX LLC (PETRO MEX), Telephone (505) 330-2467, P.O. Box 6724, Farmington, NM 87499, have jointly submitted a Stage 1 Abatement Plan Proposal to investigate ground water contamination released during a spill of oil, sediment, and produced water on June 18, 2005, at the Richardson Operating Company - Bob and Blanche No. 1 tank battery site, located in Unit L, Section 12, Township 29 North, Range 15 West, San Juan County, New Mexico. Richardson Operating was the operator of record at the time that the spill occurred and began the soil and ground water investigation and remediation. Richardson Operating removed approximately 1192 cubic yards of contaminated soil and 160 barrels of contaminated ground water from the site. Richardson Operating determined that the ground water at the site has been contaminated by benzene and xylenes at concentrations that exceed the New Mexico Water Quality Control Commission standards (see 20.6.2.3103(A) NMAC). PETRO MEX is the current operator of the site. Both parties jointly submitted a change of operator form that makes the operator change from Richardson Operating to PETRO MEX retroactive to June 8, 2005, a date that precedes the spill. Therefore, both Richardson Operating and PETRO MEX are responsible parties for the site. The Stage 1 Abatement Plan Proposal specifies that Richardson Operating and PETRO MEX will: make public notice and provide for public participation; investigate the ground water contamination at the site by advancing soil borings, installing monitor wells, monitoring and analyzing ground water; determine the geology and hydrogeology of the site; and, submit an investigation report.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The Stage 1 Abatement Plan Proposal may be viewed at the above address or at the Oil Conservation Division Aztec District Office, 1000 Rio Brazos Road, Aztec, New Mexico 87410, Telephone (505) 334-6178, between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on the proposed Stage 1 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow at least 30 days from the date of publication of this notice for the submittal of written comments.

EXHIBIT "B"  
NOTIFICATION MAILING LIST

Parcel # / Ref	Name	Name 2	Street	City	State	Zip	Mail Type sent 10/21/05
83380	Allman Kenneth W Trust	c/o Samuel Ellison	PO Box 565	Kirtland	NM	87417-0565	Regular mail
83246	Alfred Tumilson	c/o Shawn Manzanares	PO Box 1567	Kirtland	NM	87417-1567	Regular mail
83521	Alfreda West		PO Box 1691	Fruitland	NM	87416-1691	Regular mail
80104; 8000215	Alice Biggs		511 RD 6100 NBU-1	Kirtland	NM	87417-7417	Regular mail
83299; 83298	Allen Armer		470A CR 6100 NBU 24	Kirtland	NM	87417-7417	Regular mail
83395	Allen Hamilton		PO Box 1671	Fruitland	NM	87416-1671	Regular mail
82728	Allison Family Trust	c/o Corenda Jackson	PO Box 834	Fruitland	NM	87416-0834	Regular mail
82731	Allison Family Trust	c/o Rafael Almeida	PO Box 731	Kirtland	NM	87499-0731	Regular mail
81181; 81180	Alma Lambson		13 Rd 6400 NBU 52 #2	Kirtland	NM	87417-7417	Regular mail
83209	Avin Hill		7716 West Ludlow Dr.	Peoria	AZ	85381-4661	Regular mail
83574	Amelia Schurig		8211 E Tesoro Cir	Mesa	AZ	85207-5207	Regular mail
82740	Anthony Ashcroft		PO Box 2304	Kirtland	NM	87417-7417	Regular mail
80909	Anthony Grisolano		PO Box 717	Kirtland	NM	87417-7417	Regular mail
81392	Anthony Rivas		PO Box 1036	Fruitland	NM	87416-1036	Regular mail
83397	Anthony Silva		PO Box 36	Kirtland	NM	87417-7417	Regular mail
80414	Associates Financial Service CO	c/o Peter Carlston	13 CR 6193	Kirtland	NM	87417-7417	Regular mail
80363	Athelee Coston		PO Box 201	Kirtland	NM	87417-0201	Regular mail
80860	Bank of New York		PO Box 361	Kirtland	NM	87417-0361	Regular mail
82142	Barbara Woffen		PO Box 1127	Kirtland	NM	87417-0001	Regular mail
80464	Barry Williams		CR 6570 #16A	Kirtland	NM	87417-7417	Regular mail
83399; 83385	Barton Palmer		PO Box 288	Kirtland	NM	87417-0288	Regular mail
81987; 80191	Ben Dresher		PO Box 736	Kirtland	NM	87417-0736	Regular mail
80268	Betty Canfield		5 RD 6570 NBU 2	Kirtland	NM	87417-7417	Regular mail
82749	Beverly Palmer		18960 RD V	Kirtland	NM	87417-7417	Regular mail
82004	Billy Baker		12 CR 6553	Sanford	CO	81151-1151	Regular mail
82717	Billy Beevers		808 W Highland	Kirtland	NM	87417-9428	Regular mail
82475; 82476	Blake Chanslor Trust		PO Box 6323	Bloomfield	NM	87413-6613	Regular mail
80928	Bob Hampton		14 RD 6570 NBU 2	Albuquerque	NM	87197-6323	Regular mail
80019	Bobbie Andrews		PO Box 1274	Kirtland	NM	87417-7417	Regular mail
4001071; 4001070; 4001069; 4001068; 4001067; 4001066; 4001065; 4001064; 4001063; 4001062; 4001061; 4001060; 4001059; 4001058	Bosco & Anne Krivokapich Boyd Family Revocable Trust	c/o T McKinley Myer c/o Angel Garcia	PO Box 730 88A CR 6400 34 CR 6750 502 CR 6100 PO Box 978 4124 HWY 64 PO Box 2931 PO Box 256	Bloomfield Kirtland Kirtland Kirtland Kirtland Kirtland Kirtland	NM NM NM NM NM NM NM	87413-7413 87417-7417 87417-7417 87417-7417 87417-0978 87417-7417 87417-0256	Regular mail Regular mail Regular mail Regular mail Regular mail Regular mail Regular mail
81093	Brian Dowdy						
82469	Bruce Davis						
81766	Bryant Sherwood Trust						
80361	Bryant Sherwood Trust						
8000005	Carol Dyer						
80107	Catherine Bond						
81659; 81658; 81656	Catherine Price		PO Pox 256	Kirtland	NM	87417-0256	Regular mail
81986	Chae Darnell		PO Box 2008	Kirtland	NM	87417-2008	Regular mail
82993	Charles Clouthier		1901 Camino Rio	Farmington	NM	87401-8049	Regular mail
80450	Chas Roderick		PO Box 353	Fruitland	NM	87416-0353	Regular mail
80102; 80101	Chester Benally		30 RD 6570	Kirtland	NM	87417-9440	Regular mail
81530; 81527	Chester Myers Trustees	c/o John Green	PO Box 3423	Telluride	CO	81435-3423	Regular mail

EXHIBIT "B"  
NOTIFICATION MAILING LIST

Parcel # / Ref	Name	Name 2	Street	City	State	Zip	Mail Type sent 10/21/05
80134; 83096	Chris Barbee		PO Box 2481	Kirtland	NM	87417-7417	Regular mail
80105	Christa Horne		16 CR 6553	Kirtland	NM	87417-9428	Regular mail
82754; 82751; 80490; 82478;	Church Latter Day Saints		50 E North Temple St	Salt Lake City	UT	84150-4150	Regular mail
80312	Church of San Juan Baptist Association		PO Box 38	Kirtland	NM	87417-0038	Regular mail
80321; 80317	Clayde Hatch		PO Box 64	Fruitland	NM	87416-0064	Regular mail
80967	Clay Bennett		PO Box 1843	Kirtland	NM	87417-1843	Regular mail
80329	Clayton Investments Inc		4130 HWY 64	Kirtland	NM	87417-7417	Regular mail
82667	Cleona Winn	c/o Circle W. Production, Inc	513 RD 6100 NBU-1	Kirtland	NM	87417-7417	Regular mail
80065	Cloyd Beckstead		PO Box 491	Kirtland	NM	87417-7417	Regular mail
80328	Cody Gusty		PO Box 693	Kirtland	NM	87417-0693	Regular mail
80892; 80971;	Collin Hatch		PO Box 322	Fruitland	NM	87416-0322	Regular mail
81002	Community First National Bank		4085 Hwy 64	Kirtland	NM	87417-9410	Regular mail
80738	Cori Ann Mapp	c/o Betty Stallings	PO Box 2003	Kirtland	NM	87417-7417	Regular mail
81714	Curtis Blackwater		9 CR 6570	Kirtland	NM	87417-9440	Regular mail
81574	Daisy Knoll		PO Box 774	Kirtland	NM	87417-0774	Regular mail
80364	Dale Lukow		14 Rd 6466 NBU 4	Kirtland	NM	87417-7417	Regular mail
83509	Dale Medford		PO Box 144	Kirtland	NM	87417-7417	Regular mail
83003	Dale Riemer		16C CR 6570	Kirtland	NM	87417-7417	Regular mail
80193	Daniel Booth		PO Box 386	Kirtland	NM	87417-0386	Regular mail
82368; 80969	Daniel Moore		PO Box 958	Fruitland	NM	87416-0958	Regular mail
80970; 80451	Daniell Trampp		PO Box 236	Fruitland	NM	87416-7416	Regular mail
83155	Danny Cockrell		PO Box 615	Kirtland	NM	87417-0615	Regular mail
82730	David Allison Trust	c/o Vern George	PO Box 556	Fruitland	NM	87416-0556	Regular mail
82727; 82729	David Allison Trust	c/o Corrina Yazzie	PO Box 74	Kirtland	NM	87417-0074	Regular mail
81756	David Biser		PO Box 344	Kirtland	NM	87417-0344	Regular mail
82964	David Bushman		200 N Allen	Farmington	NM	87401-7401	Regular mail
81090	David Harris		PO Box 888	Kirtland	NM	87417-7417	Regular mail
81035	David Holland		PO Box 372	Kirtland	NM	87417-0372	Regular mail
82147	David Walraven		PO Box 503	Kirtland	NM	87417-0503	Regular mail
81140; 83352;	Davonna Heaston		5606 Greenwood	Farmington	NM	87402-8238	Regular mail
81510	Debra Homer		518 RD 6100	Kirtland	NM	87417-9316	Regular mail
80742	Dennis Duncan		10 CR 6541	Kirtland	NM	87417-7417	Regular mail
82663	Derek Wethington		PO Box 1292	Kirtland	NM	87417-7417	Regular mail
4002416; 82065	Dicar Trust		PO Box 958	Fruitland	NM	87416-0958	Regular mail
80968	Dolly Marfin		PO Box 748	Kirtland	NM	87417-7417	Regular mail
8000040	Donald Lawrence		PO Box 294	Pinehill	NM	87357-0294	Regular mail
80780	Dorothy Lambson		PO Box 1247	Kirtland	NM	87417-1247	Regular mail
81696	Douglas Biggs		509 CR 6100	Kirtland	NM	87417-7417	Regular mail
8000106	Doyle Hill		PO Box 1098	Kirtland	NM	87417-1098	Regular mail
81014	Doyle Nelson		510 CR 6100	Kirtland	NM	87417-7417	Regular mail
80067	E. L. Kennedy & Associates		3847 E Adobe St	Mesa	AZ	85205-5205	Regular mail
81134; 81135;	Earl Burnett		500 CR 6100	Kirtland	NM	87417-7417	Regular mail
81133	Earl Hathaway		PO Box 241	Kirtland	NM	87417-0241	Regular mail
83576; 83580;							
80133							
80980							

EXHIBIT "B"  
NOTIFICATION MAILING LIST

Parcel # / Ref	Name	Name 2	Street	City	State	Zip	Mail Type sent 10/21/05
80246; 82444;							
80412	Edwin Singer	c/o Tim Washburn	PO Box 466	Kirtland	NM	87417-7417	Regular mail
81051	Elaire Berthoff		532 Teton Dr.	Farmington	NM	87401-7401	Regular mail
83374	Eietta Benally		PO Box 2043	Kirtland	NM	87417-2043	Regular mail
82736	Elizabeth Reid		PO Box 338	Fruitland	NM	87416-7416	Regular mail
82304	Ellis Davie		712 Stanford Dr	Placencia	CA	92670-5116	Regular mail
82963	Ellis Tanner		PO Box 636	Gallup	NM	87301-0636	Regular mail
8000039	Eloy Montano		PO Box 2162	Fruitland	NM	87416-7416	Regular mail
81592; 81593	Ethel Palmer		521 Rd 6100	Kirtland	NM	87417-7417	Regular mail
82301	Evelyn Nielson		PO Box 1014	Springfield	VA	22151-0014	Regular mail
80459	Evelyn Woods		PO Box 37	Kirtland	NM	87417-7417	Regular mail
80239	Family Dollar Store		PO Box 1017	Charlotte	NC	28201-1017	Regular mail
80508	Finch Storey		PO Box 54	Fruitland	NM	87416-0054	Regular mail
81146	Flora Kennedy Trust		PO Box 527	Kirtland	NM	87417-0527	Regular mail
83492	Food Fair Inc		PO Box 568	Kirtland	NM	87417-7417	Regular mail
81765	Francine Post		PO Box 102	Lindrieth	NM	87029-0102	Regular mail
81512	Francis Redhouse		PO Box 2235	Kirtland	NM	87417-2235	Regular mail
80015	Fred Hatathlie		PO Box 2335	Kirtland	NM	87417-2335	Regular mail
82716	Fred Huffman		PO Box 803	Kirtland	NM	87417-0803	Regular mail
82275; 82478	Fredrick Gilmore		4610 W Main St	Farmington	NM	87401-7401	Regular mail
80378	Freida Davidson		PO Box 625	Kirtland	NM	87417-7417	Regular mail
82959	Gary Cline		PO Box 1227	Kirtland	NM	87417-1227	Regular mail
83524	Gary Everett		185 CR 6700	Waterflow	NM	87421-9600	Regular mail
80535	Gary Martinez		PO Box 1511	Ignacio	NM	81137-1137	Regular mail
81475	George Masoner		PO Box 174	Kirtland	CO	81137-1137	Regular mail
82896; 83533	Giant Four Corners, Inc	c/o Tax Department	23733 Scottsdale Rd	Scottsdale	AZ	85255-3465	Regular mail
80736	Glenn Crawford		PO Box 1663	Kirtland	NM	87417-1663	Regular mail
80341	Goldie Coker		PO Box 381	Fruitland	NM	87416-0381	Regular mail
81763	Greg Sherwood		PO Box 1312	Kirtland	NM	87417-1312	Regular mail
80106	Harold Anderson		14 CR 6553 NBU 6	Kirtland	NM	87417-9428	Regular mail
82662	Harry and Betty Smiley		10 CR 6401	Kirtland	NM	87417-7417	Regular mail
81906	Harvey Begay		PO Box 158	Fruitland	NM	87416-0158	Regular mail
82299	Hattermer Family Trust		4838 W 138 St	Hawthorne	CA	90250-6541	Regular mail
80386; 82300	Hattermer Family Trust		4836 W 138 St	Hawthorne	CA	90250-6541	Regular mail
8000041	Helen Reuter Trust		401 Cottage Ave	Abilene	KS	67410-2832	Regular mail
83097	Herb Glazer	attn Duckwall Alco Stores Inc	500A Rd 6100	Kirtland	NM	87417-9316	Regular mail
80452; 81680	Howard Baxstrom		18633 Hwy 145	Dolores	CO	81323-9721	Regular mail
80465	Howard Ransdell		5 CR 6668	Fruitland	NM	87416-7416	Regular mail
80100	Hubert Harwood		PO Box 2891	Kirtland	NM	87417-7417	Regular mail
80765	Hugh M Foutz		536 Rd 6100	Kirtland	NM	87417-9317	Regular mail
80754	Iley Dee Jackson		30 CR 6566	Kirtland	NM	87417-9438	Regular mail
83369; 82473	Indian Bus Lines		PO Box 372	Cuba	NM	87013-7013	Regular mail
80380	Indian Bus Lines	c/o Brandy Kannon	PO Box 1786	Kirtland	NM	87417-7417	Regular mail
81511; 83351	Isabell EV Trustees		4429 Bella Vista Cr.	Farmington	NM	87401-9273	Regular mail
1000511	Ivan Kennedy		PO Box 286	Fruitland	NM	87416-7416	Regular mail
82668	Jack Manning		17 CR 6553	Kirtland	NM	87417-9429	Regular mail
82140	Jack O'Neal		2 RD 6557 NBU 3	Kirtland	NM	87417-9450	Regular mail
82737	Jackquilyn Stock		PO Box 265	Fruitland	NM	87416-7416	Regular mail
80382	Jackson Roland		PO Box 586	Kirtland	NM	87417-0586	Regular mail

EXHIBIT "B"  
NOTIFICATION MAILING LIST

Parcel # / Ref	Name	Name 2	Street	City	State	Zip	Mail Type sent 10/21/05
83396	James and Tammie Silva		PO Box 403	Kirtland	NM	87417-0403	Regular mail
81171	James Malouff		PO Box 42	Kirtland	NM	87417-0042	Regular mail
8000132	James Moore		7 CR 6820	Waterflow	NM	87417-7421	Regular mail
80510	James Serrano		4 CR 6565	Kirtland	NM	87417-9434	Regular mail
81822; 81823	James Spangler		PO Box 426	Fruitland	NM	87416-0426	Regular mail
81043	James Truett		24 CR 5817 NBU 3003	Farmington	NM	87401-9527	Regular mail
82122	James Williams		PO Box 1081	Kirtland	NM	87417-1081	Regular mail
80770	Jane Foutz		PO Box 214	Kirtland	NM	87417-0214	Regular mail
82750	Jeffrey Smaka		PO Box 165	Kirtland	NM	87417-0165	Regular mail
82283	Jerald Wright		2452 West Blanco Blvd	Bloomfield	NM	87413-7413	Regular mail
81872; 82124	Jerry Stewart		PO Box 792	Kirtland	NM	87417-0792	Regular mail
81379	Jerry Watkins		PO Box 694	Kirtland	NM	87417-0694	Regular mail
83468	Jesus Rodriguez		PO Box 612	Kirtland	NM	87417-7417	Regular mail
81160	Jimmie Knees		33 CR 6566	Kirtland	NM	87417-9438	Regular mail
80123; 82994	Joe Tanner		PO Box 97	Gallup	NM	87305-0097	Regular mail
80383; 80776	Joel Foutz		PO Box 784	Kirtland	NM	87417-0784	Regular mail
80237	John Allen Foutz Trust		4208 St Michaels Dr	Farmington	NM	87401-7401	Regular mail
80398	John DeWitt		PO Box 711	Kirtland	NM	87417-0711	Regular mail
82005	John Walker		22 CR 6570 NBU 210	Kirtland	NM	87417-7417	Regular mail
82725	Johnny Chiquito		PO Box 1201	Kirtland	NM	87417-1201	Regular mail
80475	Jonathan Facticeau		PO Box 2181	Kirtland	NM	87417-2181	Regular mail
80348	Joseph Collyer		PO Box 1842	Fruitland	NM	87416-7416	Regular mail
82665; 82664;	Joseph Nelson		36 CR 6541	Kirtland	NM	87417-7417	Regular mail
80005	Juanita Kennedy	c/o Marilyn Court	2946 Sierra Dr. NE	Abuquerque	NM	87110-7110	Regular mail
80253; 81138							
81141; 8000000;							
83125	Kelley Costner		4125 US 64	Kirtland	NM	87417-7417	Regular mail
80896	Kenneth Beatty		64 CR 6775	Fruitland	NM	87416-7416	Regular mail
80278; 80279	Kenneth Chadborn		PO Box 176	Kirtland	NM	87417-0176	Regular mail
83098	Kenneth Christensen		31 CR 6570	Kirtland	NM	87417-7417	Regular mail
80468; 80467;							
81795; 83058	Kenneth Smith		PO Box 1774	Kirtland	NM	87417-7417	Regular mail
4001281	Kenny Benally		PO Box 133	Kirtland	NM	87417-7417	Regular mail
8000140; 8000015	Kevin Erickson		PO Box 716	Kirtland	NM	87417-7417	Regular mail
82464	Keystone Energy		PO Box 962	Farmington	NM	87499-0962	Regular mail
82411	Kipton Hohenberg		PO Box 176	Fruitland	NM	87416-0176	Regular mail
81156	Kirtland Cemetary		PO Box 342	Kirtland	NM	87417-0342	Regular mail
81733	Kirtland District School #22		5 A Rd 6575	Kirtland	NM	87417-9318	Regular mail
81672	Kirtland Veterinary Clinic		1 CR 6557	Kirtland	NM	87417-7417	Regular mail
4002953	Korth Ellsworth		PO Box 1834	Kirtland	NM	87417-7417	Regular mail
83520	Krysty Volbrecht		1222 NW 83rd St	Oklahoma City	OK	73114-3114	Regular mail
81582; 81591	Lamont Palmer		10826 SE 232ND PL	Kent	WA	98031-8031	Regular mail
81922; 82955	Lance Payne		PO Box 1756	Kirtland	NM	87417-1756	Regular mail
83300; 80779	Lance Sherwood		4124 HWY 64	Kirtland	NM	87417-7417	Regular mail
81364	Lanny Christie		PO Box 387	Kirtland	NM	87417-7417	Regular mail
82365	Larry Badonie		PO Box 812	Kirtland	NM	87417-0812	Regular mail
82638	Larry Kennedy		PO Box 63	Fruitland	NM	87416-0063	Regular mail
82995	Larry Kinsel		PO Box 1171	Kirtland	NM	87417-1171	Regular mail
82366	Lee Andy		PO Box 898	Kirtland	NM	87417-7417	Regular mail
80457	Lee Eades		PO Box 994	Kirtland	NM	87417-0994	Regular mail

EXHIBIT "B"  
NOTIFICATION MAILING LIST

Parcel # / Ref	Name	Name 2	Street	City	State	Zip	Mail Type sent 10/21/05
82724	Lenora Hogue	c/o Darryl Beall	PO Box 44	Kirtland	NM	87417-7417	Regular mail
80336	Leonard Cockrell		PO Box 173	Kirtland	NM	87417-0173	Regular mail
80111	Lester McCrary		4701 Calle Mio	Farmington	NM	87401-8612	Regular mail
83376	Lillie Begay		PO Box 2056	Kirtland	NM	87417-2056	Regular mail
82837	Linda Hatch Trust		PO Box 755	Fruitland	NM	87416-7416	Regular mail
80824, 81770	Louis Shocklee		6 RD 6570 NBU 2	Kirtland	NM	87417-7417	Regular mail
81902, 81992	Louise Vernon	c/o Gayle Teverbaugh	77 CR 6480	Kirtland	NM	87417-7417	Regular mail
83573	Lower Valley Trust	c/o Travis Hamblin	PO Box 2318	Kirtland	NM	87417-2318	Regular mail
83466	Lower Valley Trust	c/o Nelson Yazzie	PO Box 242	Kirtland	NM	87417-0242	Regular mail
83356	Lower Valley Trust	c/o Jerry Nacki	PO Box 1517	Kirtland	NM	87417-7417	Regular mail
81571	Lower Valley Trust	c/o Lynn Randall	PO Box 1383	Fruitland	NM	87416-7416	Regular mail
8000018	Lower Valley Trust	c/o Virginia Jumbo	PO Box 1703	Crowpoint	NM	87313-7313	Regular mail
8000019	Lower Valley Trust	c/o Dennis Levingston	PO Box 235	Fruitland	NM	87416-7416	Regular mail
83375	Lower Valley Trust	c/o Vern George	PO Box 566	Fruitland	NM	87416-0566	Regular mail
83393	Lower Valley Trust	c/o Larry Fields	PO Box 4533	Cave Creek	AZ	85327-5327	Regular mail
82061	Lynn Bowen		514 CR 6100	Kirtland	NM	87417-7417	Regular mail
81736	Lynn Payne		1124 Glenwood St	Bloomfield	NM	87413-7413	Regular mail
83344	Lynn Randall		14 CR 6661	Kirtland	NM	87417-7417	Regular mail
83235	Mark Kannon		HCR 79 Box 5	Cuba	NM	87013-7013	Regular mail
81065	Mart & Bess Hutchins Trust		PO Box 53	Fruitland	NM	87416-0053	Regular mail
83347	Martin Snivley		4121 HWY 64	Kirtland	NM	87417-7417	Regular mail
80381	Mary Davidson		PO Box 643	Kirtland	NM	87417-7417	Regular mail
80211	Mary Lou Breckenridge		PO Box 217	Kirtland	NM	87417-0217	Regular mail
81373	Mathew Lavery		26 Abajo	Edgewood	NM	87105-7105	Regular mail
81785	Maurine Peterson		3 CR 6570 NBU 2A	Kirtland	NM	87417-9440	Regular mail
81703	Melquades Salaz	c/o Kenneth Bussell	PO Box 629	Kirtland	NM	87417-7417	Regular mail
80536	Melva Flack	attn David & Diana Signs	PO Box 3128	Kirtland	NM	87417-3128	Regular mail
80379	Michael Davidson		PO Box 733	Kirtland	NM	87417-7417	Regular mail
80447	Michael Eyring		PO Box 304	Kirtland	NM	87417-7417	Regular mail
82788	Michael Palmer		PO Box 304	Kirtland	NM	87417-9440	Regular mail
81752	Mike Sedillo Trust		18 CR 6570 NBU 2	Kirtland	NM	87417-1813	Regular mail
80298	Milfred Yazzie		PO Box 1813	Fruitland	NM	87416-7416	Regular mail
81528, 81529	Myers Family Investment		PO Box 646	Fruitland	NM	87416-0038	Regular mail
81122	Myles Jones	c/o Richard Honneffer	PO Box 38	Fruitland	NM	87416-1537	Regular mail
82758	Navajo Nation		PO Box 1537	Fruitland	NM	87416-1537	Regular mail
83386	Neil Dimmick		PO Box 9000	Window Rock	AZ	86515-6515	Regular mail
83401	Nelson Johns		PO Box 331	Fruitland	NM	87416-0331	Regular mail
8000216	Norieen Poyer		PO Box 2281	Window Rock	AZ	86515-6515	Regular mail
81994	Norma Visage		79 CR 6645	Fruitland	NM	87416-7416	Regular mail
81767	Norman Sherwood		3869 Montgomery Blvd NE Apt 1636	Albuquerque	NM	87109-1017	Regular mail
81484	Oscar Keeling		PO Box 24	Kirtland	NM	87417-0024	Regular mail
81941, 82443, 82442	Owen Thomas		765B CR 3000	Aztec	NM	87410-7410	Regular mail
83579	Pat Tuttle		18 RD 6566 NBU 4	Kirtland	NM	87417-7417	Regular mail
81402	Patrick Martin		PO Box 645	Kirtland	NM	87417-7417	Regular mail
81482	Patrick Risner		PO Box 722	Kirtland	NM	87417-0722	Regular mail
80496	Phillip Pitchford		PO Box 2401	Fruitland	NM	87416-7416	Regular mail
80255	Preston Passey		PO Box 781	Kirtland	NM	87417-0781	Regular mail
85011	Qwest Corporation		517 CR 6100	Kirtland	NM	87417-7417	Regular mail
80362	Ray Costner Trustees		1801 California St 25th Floor	Denver	CO	80202	Regular mail
			4123 HWY 64	Kirtland	NM	87417-9411	Regular mail

EXHIBIT "B"  
NOTIFICATION MAILING LIST

Parcel # / Ref	Name	Name 2	Street	City	State	Zip	Mail Type sent 10/21/05
80966; 80965	Raymond & Valerie Hatch Trust		PO Box 1506	Fruitland	NM	87416-1506	Regular mail
80976; 80979	Raymond Hatch		PO Box 8	Fruitland	NM	87416-0008	Regular mail
83156; 82038	Raymond Howard		PO Box 2357	Kirtland	NM	87417-7417	Regular mail
82346	Raymond Paul		PO Box 1456	Kirtland	NM	87417-7417	Regular mail
82786	Raymond Reid		PO Box 109	Teec Nos Pos	AZ	86514-6514	Regular mail
80124	Renn Farnsworth		42 CR 6700	Fruitland	NM	87416-7416	Regular mail
81903	Ricardo Cuevas		PO Box 188	Fruitland	NM	87416-7416	Regular mail
83382	Richard Alexander	c/o Bill Dowdy	7 CR 1738	Farmington	NM	87401-9621	Regular mail
81596; 81594;							
81595	Richard Palmer		PO Box 286	Kirtland	NM	87417-0286	Regular mail
81597	Richard Scheuble		1613 E 22nd St	Farmington	NM	87401-7401	Regular mail
80147	Robert Bond		498 CR 6100 NBU 6A	Kirtland	NM	87417-9315	Regular mail
82302	Robert Davie		17141 Santa Rita	Fountain Valley	CA	92708-2708	Regular mail
80448	Robert Duncan Trust		PO Box 376	Fruitland	NM	87416-0376	Regular mail
81409	Robert Mathes		5300 Chapel Dr	Albuquerque	NM	87114-4664	Regular mail
81757	Robert Simmons		PO Box 1813	Kirtland	NM	87417-1813	Regular mail
83569	Robert Walker		PO Box 555	Kirtland	NM	87417-0807	Regular mail
82462; 80332	Robin Fleming		5420 Vila View	Farmington	NM	87402-7402	Regular mail
81789	Rocky Martin		PO Box 748	Kirtland	NM	87417-7417	Regular mail
80506	Rollin Amick		PO Box 1315	Fruitland	NM	87416-7416	Regular mail
82039	Ronald Hipsher		90 CR 6400	Kirtland	NM	87417-9548	Regular mail
83379	Ronald Kennedy Trust		PO Box 1602	Kirtland	NM	87417-7417	Regular mail
82125	Rosalie Wilson	c/o Vincent Sanders Trust	PO Box 162	Kirtland	NM	87417-0162	Regular mail
82348	Roy Yazzie		PO Box 2232	Kirtland	NM	87417-2232	Regular mail
80247	Rudy Duran		7 CR 6565 NBU 4	Kirtland	NM	87417-9434	Regular mail
81137	Russel Bouren		12 CR 6527	Kirtland	NM	87417-7417	Regular mail
80766; 80769;							
80767	Russel Foutz Trustees		301 W Main	Farmington	NM	87401-8422	Regular mail
82273	Russel McOwen		23 CR 6541	Kirtland	NM	87417-7417	Regular mail
81124	Russel Morgan		3 RD 6565	Kirtland	NM	87417-7417	Regular mail
8000157; 80314;							
81708; 81709	San Juan County		100 S Oliver Dr.	Aztec	NM	87410-7410	Regular mail
83255	Santiago Gutierrez		PO Box 56	Fruitland	NM	87416-0056	Regular mail
81989	Sara Vardy		PO Box 977	Kirtland	NM	87417-0977	Regular mail
80867; 80751;							
81730; 80207;							
81729; 81731;							
81386; 80758;							
81732	School Central Consolidated		583 CR 6100	Kirtland	NM	87417-9318	Regular mail
83260	Shirley Hitchel		703 Sagebrush	Aztec	NM	87410-1794	Regular mail
80497; 80496	Stanely Rinard		24 CR 6566 NBU 4A	Kirtland	NM	87417-9438	Regular mail
80396	Steve Rickner		PO Box 1644	Fruitland	NM	87416-7416	Regular mail
81737	Steven Birdno		PO Box 1592	Kirtland	NM	87417-1592	Regular mail
82307	Terrance Foutz Trustees		8664 E Connie Dr	Scottsdale	AZ	85260-5305	Regular mail
4001527	Terry Halls		PO Box 2155	Kirtland	NM	87417-7417	Regular mail
4001455; 80272	Thedford Sprinkle		211 Mesa Dr	Aztec	NM	87410-7410	Regular mail
80108	Thomas Bond		PO Box 256	Kirtland	NM	87417-0256	Regular mail
82726; 82787	Thomas Smith		PO Box 8250	Albuquerque	NM	87198-7198	Regular mail
82661	Thomas William Bond Trust	Agent-Shield Rite Inc	PO Box 256	Kirtland	NM	87417-7417	Regular mail
82303	Tillie Strang		4832 W 138 St	Hawthorne	CA	90250-6541	Regular mail

EXHIBIT "B"  
NOTIFICATION MAILING LIST

Parcel # / Ref	Name	Name 2	Street	City	State	Zip	Mail Type sent 10/21/05
80406	Timothy DeWitt		PO Box 711	Kirtland	NM	87417-0711	Regular mail
83353	Timothy Foster		576 RD 6100	Kirtland	NM	87417-7417	Regular mail
82347	Timothy Wright		PO Box 234	Fruitland	NM	87416-7416	Regular mail
81604	Tohatchi Area of Opportunity and Service		100 Manuquito Dr	Tohatchi	NM	87325-7325	Regular mail
82282	Troy Stewart		PO Box 232	Fruitland	NM	87416-0232	Regular mail
82367	Tyron Brooks		17 Rd 6541	Kirtland	NM	87417-9445	Regular mail
81976	United Food Store #1 Inc		900 Schofield Ln	Farmington	NM	87401-7431	Regular mail
80757; 80760; 80761; 80759; 80756; 80753; 80755	Verda Foutz Trustee		535 Rd 6100	Kirtland	NM	87417-9317	Regular mail
8000115	Vernon Badoni		45 CR 6541	Kirtland	NM	87417-7417	Regular mail
80236	Viva Brown		789 E 3750 North	Provo	UT	84604-4604	Regular mail
80747	Walter Kennedy Trust		PO Box 527	Kirtland	NM	87417-0527	Regular mail
83130; 80529; 80527	Wanda Flack		7438 E Medina Ave	Mesa	AZ	85208-5208	Regular mail
83245	William Amos Trust		PO Box 1378	Farmington	NM	87499-7499	Regular mail
81993	William Foutz Trust		5909 Inverness Dr	Farmington	NM	87402-7402	Regular mail
OCB	Southwest Research & Information Center	ATTN: Chris Shuey	P. O. Box 4524	Abuquerque	NM	87106	Regular mail
OCB	Lee Wilson & Associates		P. O. Box 931	Santa Fe	NM	87501	Regular mail
OCB	Southwestern Public Service	Ron Dutton	P. O. Box 1261	Amarillo	TX	79170	Regular mail
OCB	Jay Lazarus		P. O. Box 5727	Santa Fe	NM	87502	Regular mail
OCB	Bruce S. Garber	Attorney-at-Law	P. O. Box 0850	Santa Fe	NM	87504-0850	Regular mail
OCB	Colorado River Board of California	ATTN: Gerald R. Zimmerman	770 Fairmont Ave, Ste. 100	Glendale	CA	91203-1035	Regular mail
OCB	Dr. Harry Bishara		P. O. Box 748	Cuba	NM	87013	Regular mail
OCB	Colorado River Basin Ctr. Forum	ATTN: Jack A. Barnett	106 West 500 South, Suite 101	Bountiful	UT	84010	Regular mail
OCB	Public Service Company of New Mexico	ATTN: Colin Adams	414 Silver, Southwest	Albuquerque	NM	87158	Regular mail
OCB	International Technology Corp	ATTN: Mike Schulz	5301 Central Avenue NE, Suite 700	Albuquerque	NM	87108	Regular mail
OCB	Ned Kendrick	Attorney-at-Law	325 Paseo de Peralta	Santa Fe	NM	87501	Regular mail
OCB-Certified	NM Trustee for Natural Resources	ATTN: William Turner	610 Gold St SW, Suite 111	Albuquerque	NM	87102	Certified
OCB-Certified	c/o American Ground Water Consultants	ATTN: Mr. Akhtar Zaman, Director	P. O. Box 1910	Window Rock	AZ	86515	Certified
OCB-Certified	Navajo Nation Minerals Department	BIA - Navajo Region	P. O. Box 1060	Gallup	NM	87305-1060	Certified
OCB-Certified	US Department of the Interior	ATTN: Director	1220 S. St. Francis	Santa Fe	NM	87505	Certified
OCB-Certified	State Parks & Recreation	ATTN: Secretary	P. O. Box 26110	Santa Fe	NM	87504	Certified
OCB-Certified	New Mexico Environment Department	ATTN: Director	Villagra Building	Santa Fe	NM	87503	Certified
OCB-Certified	Department of Game & Fish	ATTN: State Engineer	Box 30005/APR	Las Cruces	NM	88003-8005	Certified
OCB-Certified	New Mexico Department of Agriculture Soil and Water Conservation Bureau	ATTN: State Director	Bataan Building	Santa Fe	NM	87503	Certified
OCB-Certified	Water Resources Division	ATTN: Field Supervisor	2105 Osuna Road, Northeast	Albuquerque	NM	87113-1001	Certified
OCB-Certified	Bureau of Land Management		P. O. Box 27115	Santa Fe	NM	87502-0115	Certified
OCB-Certified	US Fish & Wildlife Service				NM	87113-1001	Certified

EXHIBIT "B"  
NOTIFICATION MAILING LIST

Parcel # / Ref	Name	Name 2	Street	City	State	Zip	Mail Type sent 10/21/05
OCD-Certified	NM Bureau of Mines & Mineral Resources	ATTN: Lynn Brandvold	NM Institute of Mining & Tech	Socorro	NM	87801	7004 2890 0004 7663 6080 Certified
OCD-Certified	Regional Forester	USFS Regional Office	517 Gold Avenue SW	Albuquerque	NM	87102	7004 2890 0004 7663 6097 Certified
OCD-Certified	Chief, Groundwater Bureau		Runnels Building	Santa Fe	NM	87504	7004 2890 0004 7663 6103 Certified
OCD-Certified	Chief, Hazardous Waste Bureau		Runnels Building	Santa Fe	NM	87504	7004 2890 0004 7663 6110 Certified
OCD-Certified	Elmo Baca State Historic Preservation Officer	228 E Palace Ave	Villa Rivera, Room 101	Santa Fe	NM	87503	7004 2890 0004 7663 6127 Certified
OCD-Certified	Attorney General's Office		P. O. Box 1508	Santa Fe	NM	87504	7004 2890 0004 7663 6134 Certified
OCD-Certified	New Mexico Oil & Gas Association		P. O. Box 1864	Santa Fe	NM	87504-1864	7004 2890 0004 7663 6141 Certified
OCD-Certified	San Juan County Board of Commissioners		100 South Oliver Drive	Aztec	NM	87410	7004 2890 0004 7663 6158 Certified
OCD-Certified	City of Kirtland		100 South Oliver Drive	Aztec	NM	87410	7004 2890 0004 7663 6165 Certified

**Patti L. Davis**

**From:** Patti L. Davis [pdavis@richardsonoil.com]  
**Sent:** Friday, October 21, 2005 9:28 AM  
**To:** 'ken@carihobbs.com'  
**Subject:** Notice of Publication

*Patti L. Davis, CPL*  
Land Manager  
pdavis@richardsonoil.com  
303-830-8000  
Fax 303-830-8009



TRANSMISSION VERIFICATION REPORT

TIME : 10/31/2005 12:59  
NAME : RICHARDSON OPERATING  
FAX : 3038308009  
TEL : 3038308000  
SER.# : BROF5J285141

DATE, TIME	10/31 12:52
FAX NO./NAME	15054763462
DURATION	00:06:59
PAGE(S)	18
RESULT	OK
MODE	STANDARD ECM

**AFFIDAVIT OF PUBLICATION**

**Ad No. 52470**

**STATE OF NEW MEXICO**  
**County of San Juan:**

CONNIE PRUITT, being duly sworn says:  
That she is the ADVERTISING MANAGER of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication and appeared in the Internet at The Daily Times web site on the following day(s):

Wednesday, October 26, 2005.

And the cost of the publication is \$101.92.

Connie Pruitt

ON 10/31/05 CONNIE PRUITT appeared before me, whom I know personally to be the person who signed the above document.

Wynell Corey  
My Commission Expires November 17, 2008.

**COPY OF PUBLICATION**

**NOTICE OF PUBLICATION**  
**STATE OF NEW MEXICO**  
**ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT**  
**OIL CONSERVATION DIVISION**

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following Stage 1 Abatement Plan Proposal has been submitted to the Director of the Oil Conservation Division, 1220 St. Francis Dr., Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

Patty Davis, Richardson Operating Company, Telephone (303) 830-8000, 5600 South Quebec, Suite 130B Denver, CO 80111, and Mr. Jesus Villalobos, President, PETRO MEX LLC (PETRO MEX), Telephone (505) 330-2467, P.O. Box 6724, Farmington, NM 87499, have jointly submitted a Stage 1 Abatement Plan Proposal to investigate ground water contamination released during a spill of oil, sediment, and produced water on June 18, 2005, at the Richardson Operating Company - Bob and Blanche No. 1 tank battery site, located in Unit L, Section 12, Township 29 North, Range 15 West, San Juan County, New Mexico. Richardson Operating was the operator of record at the time that the spill occurred and began the soil and ground water investigation and remediation. Richardson Operating removed approximately 1192 cubic yards of contaminated soil and 160 barrels of contaminated ground water from the site. Richardson Operating determined that the ground water at the site has been contaminated by benzene and xylenes at concentrations that exceed the New Mexico Water Quality Control Commission standards (see 20.6.2.3103(A) NMAC). PETRO MEX is the current operator of the site. Both parties jointly submitted a change of operator form that makes the operator change from Richardson Operating to PETRO MEX retroactive to June 8, 2005, a date that precedes the spill. Therefore, both Richardson Operating and PETRO MEX are responsible parties for this site. The Stage 1 Abatement Plan Proposal specifies that Richardson Operating and PETRO MEX will: make public notice and provide for public participation; investigate the ground water contamination of the site by advancing soil borings, installing monitor wells, monitoring and analyzing ground water; determine the geology and hydrogeology of the site; and, submit an investigation report.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The Stage 1 Abatement Plan Proposal may be viewed at the above address or at the Oil Conservation Division Aztec District Office, 1000 Rio Brazos Road, Aztec, New Mexico 87410, Telephone (505) 334-6178, between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on the proposed Stage 1 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow at least 30 days from the date of publication of this notice for the submittal of written comments.

Legal No. 52470 published in The Daily Times, Farmington, New Mexico on Wednesday, October 26, 2005.

**NOTICE OF PUBLICATION**

**STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION**

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following Stage 1 Abatement Plan Proposal has been submitted to the Director of the Oil Conservation Division, 1220 St. Francis Dr., Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

Patty Davis, Richardson Operating Company, Telephone (303) 830-8000, 5600 South Quebec, Suite 130B, Denver, CO 80111, and Mr. Jesus Villalobos, President, PETRO MEX LLC (PETRO MEX), Telephone (505) 330-2467, P.O. Box 6724, Farmington, NM 87499, have jointly submitted a Stage 1 Abatement Plan Proposal to investigate ground water contamination released during a spill of oil, sediment, and produced water on June 18, 2005, at the Richardson Operating Company - Bob and Blanche No. 1 tank battery site, located in Unit L, Section 12, Township 29 North, Range 15 West, San Juan County, New Mexico. Richardson Operating was the operator of record at the time that the spill occurred and began the soil and ground water investigation and remediation. Richardson Operating removed approximately 1192 cubic yards of contaminated soil and 160 barrels of contaminated ground water from the site. Richardson Operating determined that the ground water at the site has been contaminated by benzene and xylenes at concentrations that exceed the New Mexico Water Quality Control Commission standards (see 20.6.2.3103(A) NMAC). PETRO MEX is the current operator of the site. Both parties jointly submitted a change of operator form that makes the operator change from Richardson Operating to PETRO MEX retroactive to June 8, 2005, a date that precedes the spill. Therefore, both Richardson Operating and PETRO MEX are responsible

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Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The Stage 1 Abatement Plan Proposal may be viewed at the above address or at the Oil Conservation Division, Aztec District Office, 1000 Rio Brazos Road, Aztec, New Mexico 87410. Telephone (505) 334-6171 between 8:00 a.m. and 4:00 p.m. Monday through Friday. Prior to ruling on the proposed Stage 1 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow at least 30 days from the publication of this notice for the submission of written comments. Legal #77899 Pub. October 2, 2005

THE SANTA FE  
**NEW MEXICAN**  
Founded 1849

*John Heinle Land Engineering  
Richardson Operating Co.  
5600 S. Quebec St 130-B  
Greenwood Village, CO 80111*

ALTERNATE ACCOUNT: 01001  
AD NUMBER: 001437; 2 ACCOUNT: 00000123  
LEGAL NO: 77899 P.O. #: John Heinle  
28 LINES 1 TIME(S) 155.06  
AFFIDAVIT: 5.50  
TAX: 12.14  
TOTAL: 172.70

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO  
COUNTY OF SANTA FE

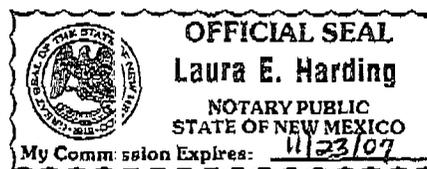
I, R. Lara, being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 77899 a copy of which is hereto attached was published in said newspaper 1 day(s) between 10/27/2005 and 10/27/2005 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 27th day of October, 2005 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

*R. Lara*  
\_\_\_\_\_  
LEGAL ADVERTISING REPRESENTATIVE

Subscribed and sworn to before me on this 27th day of October, 2005

Notary *Laura E. Harding*  
\_\_\_\_\_

Commission Expires: *11/23/07*  
\_\_\_\_\_



**NOTICE OF PUBLICATION**

**STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION**

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following Stage 1 Abatement Plan Proposal has been submitted to the Director of the Oil Conservation Division, 1220 St. Francis Dr., Santa Fe, New Mexico 87505. Telephone (505) 476-3440.

Patty Davis, Richardson Operating Company, Telephone (303) 830-8000, 5600 South Quebec, Suite 130B, Denver, CO 80111; and Mr. Jesus Villalobos, President, PETRO MEX LLC (PETRO MEX), Telephone (505) 330-2467, P.O. Box 6724, Farmington, NM 87499, have jointly submitted a Stage 1 Abatement Plan Proposal to investigate ground water contamination released during a spill of oil, sediment, and produced water on June 18, 2005, at the Richardson Operating Company - Bob and Blanche No. 1 tank battery site, located in Unit L, Section 12, Township 29 North, Range 15 West, San Juan County, New Mexico. Richardson Operating was the operator of record at the time that the spill occurred and began the soil and ground water investigation and remediation. Richardson Operating removed approximately 1192 cubic yards of contaminated soil and 160 barrels of contaminated ground water from the site. Richardson Operating determined that the ground water at the site has been contaminated by benzene and xylenes at concentrations that exceed the New Mexico Water Quality Control Commission standards (see 20.6.2.3103(A) NMAC). PETRO MEX is the current operator of the site. Both parties jointly submitted a change of operator form that makes the operator change from Richardson Operating to PETRO MEX retroactive to June 8, 2005, a date that precedes the spill. Therefore, both Richardson Operating and PETRO MEX are responsible

parties for the Stage 1 Abatement Plan Proposal. The Stage 1 Abatement Plan Proposal specifies that Richardson Operating and PETRO MEX will make public notice and provide for public participation; investigate the ground water contamination at the site by advancing soil borings, installing monitoring wells, monitoring and analyzing ground water; determine the geology and hydrogeology of the site; and submit an investigation report.

Any interested person may obtain further information from the

Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The Stage 1 Abatement Plan Proposal may be viewed at the above address or at the Oil Conservation Division District Office, 1000 Rio Brazos Road, Aztec, New Mexico 87410. Telephone (505) 334-6178 between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on the proposed Stage 1 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow at least 30 days from the date of publication of this notice for the submission of written comments. Legal #77899 Pub. October 27, 2005

ie. a- ial and partici- te. on- site the- ge- and- ga- tion report. son in the Division and may submit to the Director of the Oil Conservation Division at the address given above. The Stage 1 Abatement Plan Proposal may be viewed at the above address or at the Oil Conservation Division District Office, 1000 Rio Brazos Road, Aztec, New Mexico 87410. Telephone (505) 334-6178 between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on the proposed Stage 1 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow at least 30 days from the date of publication of this notice for the submission of written comments. Legal #77899 Pub. October 27, 2005

STATE OF COLORADO §  
  §  
COUNTY OF ARAPAHOE §

**AFFIDAVIT OF MAILING**

Patti L. Davis, of lawful age, being first duly sworn upon her oath, states, and declares:

That she is employed by Richardson Operating Company as Land Manager; and

That the "Notice of Publication" attached hereto as Exhibit "A" was mailed to the individuals, firms and corporations set forth on Exhibit "B" attached hereto on this 26<sup>st</sup> day of October, 2005; and

That the notices were mailed in compliance with requirements set forth in that certain letter dated October 18, 2006 from Glenn von Gonten, Senior Hydrologist with the Oil Conservation Division of the Energy, Minerals and Natural Resources Department in and for the State of New Mexico.

Further affiant saith not.

  
\_\_\_\_\_  
Patti L. Davis

Subscribed and sworn to before me by Patti L. Davis this 31<sup>st</sup> day of October, 2005.

LARISA BARAYEVA  
NOTARY PUBLIC  
STATE OF COLORADO  
My Commission Expires 06/27/2009

  
\_\_\_\_\_  
Notary Public

## **EXHIBIT "A"**

### **NOTICE OF PUBLICATION**

#### **STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION**

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following Stage 1 Abatement Plan Proposal has been submitted to the Director of the Oil Conservation Division, 1220 St. Francis Dr., Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

Patti Davis, Richardson Operating Company, Telephone (303) 830-8000, 5600 South Quebec, Suite 130B Denver, CO 80111, and Mr. Jesus Villalobos, President, PETRO MEX LLC (PETRO MEX), Telephone (505) 330-2467, P.O. Box 6724, Farmington, NM 87499, have jointly submitted a Stage 1 Abatement Plan Proposal to investigate ground water contamination released during a spill of oil, sediment, and produced water on June 18, 2005, at the Richardson Operating Company - Bob and Blanche No. 1 tank battery site, located in Unit L, Section 12, Township 29 North, Range 15 West, San Juan County, New Mexico. Richardson Operating was the operator of record at the time that the spill occurred and began the soil and ground water investigation and remediation. Richardson Operating removed approximately 1192 cubic yards of contaminated soil and 160 barrels of contaminated ground water from the site. Richardson Operating determined that the ground water at the site has been contaminated by benzene and xylenes at concentrations that exceed the New Mexico Water Quality Control Commission standards (see 20.6.2.3103(A) NMAC). PETRO MEX is the current operator of the site. Both parties jointly submitted a change of operator form that makes the operator change from Richardson Operating to PETRO MEX retroactive to June 8, 2005, a date that precedes the spill. Therefore, both Richardson Operating and PETRO MEX are responsible parties for the site. The Stage 1 Abatement Plan Proposal specifies that Richardson Operating and PETRO MEX will: make public notice and provide for public participation; investigate the ground water contamination at the site by advancing soil borings, installing monitor wells, monitoring and analyzing ground water; determine the geology and hydrogeology of the site; and, submit an investigation report.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The Stage 1 Abatement Plan Proposal may be viewed at the above address or at the Oil Conservation Division Aztec District Office, 1000 Rio Brazos Road, Aztec, New Mexico 87410, Telephone (505) 334-6178, between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on the proposed Stage 1 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow at least 30 days from the date of publication of this notice for the submittal of written comments.

**EXHIBIT "B"**

San Juan College  
4601 College Blvd  
Farmington, NM 87401-4609

Joyce Ford  
12 Rd 3435  
Farmington, NM 87410-7410

Rocky Martin  
PO Box 2746  
Kirtland, NM 87417-2746

Mark Durnill  
2216 Camina Placer  
Farmington, NM 87401-8141

Donald Moats  
PO Box 600  
Kirtland, NM 87417-7417

Derrick Taylor  
23661 CR P  
Cortez, CO 81321-1321

Foutz Support Trust  
c/o Joes Foutz  
PO Box 735  
Kirtland, NM 87417-7417

Thomas Taylor  
AZ Ranch 57 Tovar Box 698  
Holbrook, AZ 86025-0698

Dewey Foutz Sr. Trustees  
3456 Joseph Way  
Gilbert, AZ 85297-5297

Bill Davey  
1511 E, Kettle Av  
Littleton, CO 80122-3096

Ira Dale Hatch  
892 S 150 W  
Bountiful, UT 84010-6304

Jo Ann Ledford  
10 Rd 6470  
Kirtland, NM 87417-9515

Kenneth Hatch  
PO Box 1456  
Snowflake, AZ 85937-5937

Elaine Haws  
c/o Kelly Brett  
PO Box 15036  
Farmington, NM 87499-7499

Richard Hatch  
PO Box 57  
Fruitland, NM 87416-0057

Dalbert Lynn Hatch  
6855 Kellyn Ln  
Vista, CA 92083-1241

**ASSIGNMENT, CONVEYANCE, QUIT-CLAIM  
AND BILL OF SALE**

KNOW ALL MEN BY THESE PRESENTS, that RICHARDSON OPERATING COMPANY and RICHARDSON PRODUCTION COMPANY, with offices at 5600 South Quebec, Suite 130B, Greenwood Village, CO 80111 (hereinafter referred to as "Assignor"), for and in consideration of the sum of Ten Dollars (\$10.00) and other adequate consideration, the receipt and sufficiency of which is hereby acknowledged, does hereby SELL, TRANSFER, ASSIGN, SET OVER QUIT-CLAIM and CONVEY unto PETRO MEX LLC, whose address is Post Office Box 6724, Farmington, NM 87499 (hereinafter referred to as "Assignee"), all of Assignor's right, title and interest in and to the wellbores (hereinafter referred to as "Subject Wells") more particularly described on Exhibit "A" attached hereto and by this reference made a part hereof. It is the intent of Assignor to convey to Assignee the well equipment, casing, tubing, pumps, motors, valves, fixtures, supplies, and leasehold interests (if any) which are appurtenant to or associated with the Subject Wells. This Assignment, Conveyance and Bill of Sale is made AS IS, WHERE IS, WITHOUT WARRANTY OF MERCHANTABILITY, CONDITION OR FITNESS FOR A PARTICULAR PURPOSE, EITHER EXPRESS OR IMPLIED.

Assignee shall assume full responsibility for the Subject Wells assigned hereunder and shall indemnify and hold Assignor harmless from and against any and all claims, demands, causes of action, liabilities and losses arising out of or in connection with or resulting from or through Assignee's ownership of the assigned Subject Wells including, but not limited to, the plugging and abandonment of the Subject Wells, acquisition of oil and gas leases covering lands committed to the Subject Wells and any necessary environmental remediation.

This Assignment, Conveyance, Quit-Claim and Bill of Sale is made subject to that certain Letter Agreement by and between Assignor and Assignee dated June 8, 2005, a copy of which may be obtained by interested persons by written request delivered to either of the parties hereto.

TO HAVE AND TO HOLD the Subject Wells unto Assignee, its successors and assigns forever.

The terms and conditions of this Assignment shall extend to and be binding upon the successors and assigns of the parties hereto.

IN WITNESS WHEREOF, Assignor and Assignee have executed this document on this 8th day of June, 2005, to be effective as of June 1, 2005 at 7:00 a.m., Mountain Time.

**ASSIGNOR:**

**RICHARDSON OPERATING COMPANY**

By: David B. Richardson  
David B. Richardson, President

**RICHARDSON PRODUCTION COMPANY**

By: David B. Richardson  
David B. Richardson, President

**ASSIGNEE:**

**PETRO MEX, LLC**

By: Juan Villalobos  
Name: Juan Villalobos  
Title: President



(Acknowledgments Attached)



200516458 09/09/2005 01:05P  
1of3 B1417 P441 R 13.00 D 0.00  
San Juan County, NM Clerk FROM REASONS

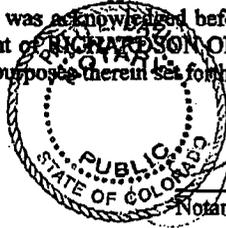
ACKNOWLEDGEMENTS

STATE OF COLORADO )  
 ) §  
COUNTY OF DENVER )

The foregoing instrument was acknowledged before me this 8th day of June, 2005, by David B. Richardson, as President of RICHARDSON OPERATING COMPANY, on behalf of said corporation for the uses and purposes therein set forth.

My Commission Expires:

3-11-2008



*Patricia J. Davis*  
Notary Public

STATE OF COLORADO )  
 ) §  
COUNTY OF DENVER )

The foregoing instrument was acknowledged before me this 8th day of June, 2005, by David B. Richardson, as President of RICHARDSON PRODUCTION COMPANY, on behalf of said corporation for the uses and purposes therein set forth.

My Commission Expires:

3-11-2008



*Patricia J. Davis*  
Notary Public

STATE OF NEW MEXICO )  
 ) §  
COUNTY OF SAN JUAN )

The foregoing instrument was acknowledged before me this 21<sup>st</sup> day of June, 2005, by JESUS OLLA LOBOS, on behalf of PETRO MEX, LLC for the uses and purposes therein set forth.

My Commission Expires:

2-27-09



*Sandra Losoya*  
Notary Public

200516458 09/09/2005 01:05P  
2of3 B1417 P441 R 13.00 D 0.00  
San Juan County, NM Clerk FROM HANSHARDT

**EXHIBIT "A"**  
 Attached to and made a part of that certain Assignment, Conveyance, Quit-Claim and Bill of Sale  
 dated June 8, 2005

ROPCO ID	WELL NAME	API	QQ	LOC	SEC	TWP	RGE
NM-018-001	FRUITLAND #1	30-045-24972	I	NESE	3	29N	16W
NM-018-002	FRUITLAND #3	30-045-25916	J	NWSE	3	29N	15W
NM-019-001	KIRTLAND #01	30-045-23470	A	ENE	13	29N	15W
NM-019-002	KIRTLAND #02	30-045-23677	B	WNE	13	28N	15W
NM-019-004	KIRTLAND #04	30-045-23716	E	WNW	18	29N	14W
NM-019-005	KIRTLAND #05	30-045-24304	J	WSE	12	29N	15W
NM-019-006	KIRTLAND #06	30-045-24448	C	ENW	13	28N	15W
NM-019-007	KIRTLAND #07	30-045-24466	D	WNW	13	28N	15W
NM-019-008	KIRTLAND #08	30-045-25028	O	SSE	11	29N	15W
NM-019-009	KIRTLAND #09	30-045-25029	K	ESW	12	28N	16W
NM-019-010	KIRTLAND #10	30-045-25027	M	Lot 4	7	28N	14W
NM-019-011	KIRTLAND #11	30-045-25306	C	ENW	18	28N	14W
NM-019-014	KIRTLAND 18 #3	30-045-23738	B	NNE	18	29N	14W
NM-019-017	MOORE #1	30-045-24742	E	SNW	12	29N	15W
NM-019-012	KIRTLAND 14 #1	30-045-25922	A	NE	14	29N	15W
NM-019-013	KIRTLAND 18 #1	30-045-25203	A	N/2	18	29N	14W
NM-019-016	BOB & BLANCHE #1	30-045-24743	L	WSSW	12	29N	15W
NM-019-018	TRS-EVI #1	30-045-24833	H	SNE	11	28N	15W
NM-019-018	DOROTHY #1	30-045-24262	I	NSE	11	29N	15W

200516458 09/09/2005 01:05P  
 3038 B1417 P441 R 13.00 D 0.00  
 San Juan County, NM Clerk FRAN HANHARDT



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

October 19, 2005

Ms. Patty Davis  
Richardson Operation Company  
5600 South Quebec  
Suite 130B  
Denver, CO 80111

Mr. Jesus Villalobos  
President  
PETRO MEX LLC  
P.O. Box 6724  
Farmington, NM 87499

**RE: REVISED NOTICE OF PUBLICATION  
STAGE 1 ABATEMENT PLAN PROPOSAL  
AP040**

Dear Ms. Davis and Villalobos:

The New Mexico Oil Conservation Division (OCD) is sending you a revised Notice of Publication in response to comments made by John Heinle on October 19, 2005. The revised Notice of Publication specifies that Mr. Patty Davis rather than Mr. John Heinle should be contacted with questions. The revised Notice of Publication now specifies that both Richardson Operating and PETRO MEX "...will: *make public notice and provide for public participation; investigate the ground water contamination at the site by advancing soil borings, installing monitor wells, monitoring and analyzing ground water; determine the geology and hydrogeology of the site; and, submit an investigation report.*"

If you have any questions, please call me at 505-476-3488.

Sincerely,

Glenn von Gonten  
Senior Hydrologist

## NOTICE OF PUBLICATION

### STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following Stage 1 Abatement Plan Proposal has been submitted to the Director of the Oil Conservation Division, 1220 St. Francis Dr., Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

Patty Davis, Richardson Operating Company, Telephone (303) 830-8000, 5600 South Quebec, Suite 130B Denver, CO 80111, and Mr. Jesus Villalobos, President, PETRO MEX LLC (PETRO MEX), Telephone (505) 330-2467, P.O. Box 6724, Farmington, NM 87499, have jointly submitted a Stage 1 Abatement Plan Proposal to investigate ground water contamination released during a spill of oil, sediment, and produced water on June 18, 2005, at the Richardson Operating Company - Bob and Blanche No. 1 tank battery site, located in Unit L, Section 12, Township 29 North, Range 15 West, San Juan County, New Mexico. Richardson Operating was the operator of record at the time that the spill occurred and began the soil and ground water investigation and remediation. Richardson Operating removed approximately 1192 cubic yards of contaminated soil and 160 barrels of contaminated ground water from the site. Richardson Operating determined that the ground water at the site has been contaminated by benzene and xylenes at concentrations that exceed the New Mexico Water Quality Control Commission standards (see 20.6.2.3103(A) NMAC). PETRO MEX is the current operator of the site. Both parties jointly submitted a change of operator form that makes the operator change from Richardson Operating to PETRO MEX retroactive to June 8, 2005, a date that precedes the spill. Therefore, both Richardson Operating and PETRO MEX are responsible parties for the site. The Stage 1 Abatement Plan Proposal specifies that Richardson Operating and PETRO MEX will: make public notice and provide for public participation; investigate the ground water contamination at the site by advancing soil borings, installing monitor wells, monitoring and analyzing ground water; determine the geology and hydrogeology of the site; and, submit an investigation report.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The Stage 1 Abatement Plan Proposal may be viewed at the above address or at the Oil Conservation Division Aztec District Office, 1000 Rio Brazos Road, Aztec, New Mexico 87410, Telephone (505) 334-6178, between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on the proposed Stage 1 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow at least 30 days from the date of publication of this notice for the submittal of written comments.



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

September 7, 2005

**CERTIFIED MAIL  
RETURN RECEIPT NO: 7923 4634**

Mr. David B. Richardson  
President  
Richardson Operation Company  
5600 South Quebec  
Suite 130B  
Denver, CO 80111

Mr. Jesus Villalobos  
President  
PETRO MEX LLC  
P.O. Box 6724  
Farmington, NM 87499

**RE: REQUIREMENT TO SUBMIT STAGE 1 ABATEMENT PLAN FOR THE  
BOB AND BLANCHE No. 1 SPILL  
3R0401**

Dear Mr. Richardson and Mr. Villalobos:

The OCD hereby requires the Richardson Operating Company (Richardson) and Petro Mex LLC (Petro Mex) to jointly submit a Stage 1 Abatement Plan in accordance with OCD's Rule 19 (19.15.1.19 NMAC) by no later than October 7, 2005. The State 1 abatement plan proposal must be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office. The Stage 1 Abatement Plan may be based on Richardson's previously approved ground water investigation work plan (*Workplan to Delineate The Horizontal and Vertical Extent Of Any Groundwater and Soil Contamination*) dated August 25, 2005, but must meet of all the requirements specified in Rule 19 (19.15.1.19 NMAC), including, but not limited to the public notice and participation requirements in Subsection G of 19.15.1.19 NMAC.

The OCD is requiring a joint submittal because it appears that both Richardson and Petro Mex are responsible parties. Richardson was the operator of record with the OCD at the time that the spill occurred, and began the soil and ground water investigation and remediation. Petro Mex is the current operator of the site and the change of operator form submitted by the parties makes

the operator change from Richardson to Petro Mex retroactive to June 8, 2005, a date that precedes the spill.

If you have any questions, please call Glenn von Gonten at (505) 476-3488.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger C. Anderson". The signature is fluid and cursive, with a large initial "R" and "A".

Roger C. Anderson  
Environmental Bureau Chief

xc: Denny Foust, OCD Aztec District Office



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**  
Governor  
**Joanna Prukop**  
Cabinet Secretary

**Mark E. Fesmire, P.E.**  
Director  
Oil Conservation Division

September 7, 2005

**CERTIFIED MAIL**  
**RETURN RECEIPT NO: 7923 4627**

Mr. David B. Richardson  
President  
Richardson Operation Company  
5600 South Quebec  
Suite 130B  
Denver, CO 80111

Mr. Jesus Villalobos  
President  
PETRO MEX LLC  
P.O. Box 6724  
Farmington, NM 87499

**RE: REQUIREMENT TO SUBMIT STAGE 1 ABATEMENT PLAN FOR THE  
BOB AND BLANCHE No. 1 SPILL  
3R0401**

Dear Mr. Richardson and Mr. Villalobos:

The OCD hereby requires the Richardson Operating Company (Richardson) and Petro Mex LLC (Petro Mex) to jointly submit a Stage 1 Abatement Plan in accordance with OCD's Rule 19 (19.15.1.19 NMAC) by no later than October 7, 2005. The State 1 abatement plan proposal must be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office. The Stage 1 Abatement Plan may be based on Richardson's previously approved ground water investigation work plan (*Workplan to Delineate The Horizontal and Vertical Extent Of Any Groundwater and Soil Contamination*) dated August 25, 2005, but must meet of all the requirements specified in Rule 19 (19.15.1.19 NMAC), including, but not limited to the public notice and participation requirements in Subsection G of 19.15.1.19 NMAC.

The OCD is requiring a joint submittal because it appears that both Richardson and Petro Mex are responsible parties. Richardson was the operator of record with the OCD at the time that the spill occurred, and began the soil and ground water investigation and remediation. Petro Mex is the current operator of the site and the change of operator form submitted by the parties makes

the operator change from Richardson to Petro Mex retroactive to June 8, 2005, a date that precedes the spill.

If you have any questions, please call Glenn von Gonten at (505) 476-3488.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger C. Anderson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Roger C. Anderson  
Environmental Bureau Chief

xc: Denny Foust, OCD Aztec District Office



3R0401

**RICHARDSON OPERATING COMPANY**

---

5600 South Quebec Street, Suite 130B  
Greenwood Village, CO 80111  
(303) 830-8000 Fax (303) 830-8009

September 1, 2005

Mr. Glenn von Gonten  
Senior Hydrologist  
New Mexico Energy, Minerals & Natural Resources  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Mr. Denny Foust  
New Mexico Energy, Minerals & Natural Resources  
OCD – Aztec District Office  
1000 Rio Bravos Road  
Aztec, NM 87410

RE: Work Plan to Delineate the Horizontal and Vertical Extent of Any Groundwater and S  
Soil Contamination  
Bob & Blanche No. 1

Gentlemen:

Enclosed are hard copies of the captioned plan.

Please do not hesitate to contact me if you have any questions or desire additional information regarding this matter.

Sincerely yours,

**RICHARDSON OPERATING COMPANY**

Patti L. Davis, CPL  
Land Manager

/pld

Enclosure

# Fax

**To:** Ms. Patty Davis  
Richardson Operating Company

**Fax:** 303-830-8009

**Pages:** 3, including this cover sheet. *Approval Letter @ 8/29/2005*

**Date:** August 29, 2005

**RE:** Richardson Operating Bob & Blanch No. 1 spill.

If you have any questions, please call me at 505-476-3488.



Glenn von Gonten

*12/07/2005 - Patty Davis*

Glenn von Gonten  
Senior Hydrologist  
Energy, Minerals and Natural Resources Department  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505  
505-476-3488  
Fax: 505-476-3462

TRANSACTION REPORT

P. 01

AUG-29-2005 MON 09:19 AM

FOR:

DATE	START	RECEIVER	TX TIME	PAGES	TYPE	NOTE	M#	DP
AUG-29	09:18 AM	913038308009	51"	3	SEND	OK	492	
TOTAL :						51S	PAGES:	3

# Fax

**To:** Ms. Patty Davis  
Richardson Operating Company

**Fax:** 303-830-8009

**Pages:** 3, including this cover sheet.

**Date:** August 29, 2005

**RE:** Richardson Operating Bob & Blanch No. 1 spill.

If you have any questions, please call me at 505-476-3488.



Glenn von Gonten

District III  
1000 Rio Brazos Rd., Aztec, NM  
87410

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

Form C-104A  
Permit 15219

Change of Operator

Previous Operator Information

OGRID: 19219  
Name: RICHARDSON OPERATING CO  
Address: 3100 La Plata Highway  
Address:  
City, State, Zip: Farmington, NM 87401

New Operator Information

Effective Date: 06/08/2005  
OGRID: 236452  
Name: PETRO MEX LLC  
Address: PO Box 6724  
Address:  
City, State, Zip: Farmington, NM 87499

I hereby certify that the rules of the Oil Conservation Division have been complied with and that the information on this form and the certified list of wells is true to the best of my knowledge and belief.

Previous Operator

Signature: Tom Bergin  
Printed Name: Tom Bergin  
Title: OPS Mgr  
Date: 9-1-05 Phone: 307-330-7999

New Operator

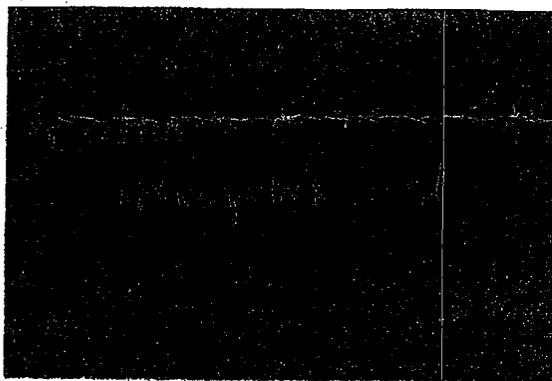
Signature: Jesus Villalobos  
Printed Name: Jesus Villalobos  
Title: President  
Date: 9-1-05 Phone: (505) 632-5948



**From Operator: RICHARDSON OPERATING CO, 19219**  
**To Operator: PETRO MEX LLC, 236452**  
**Wells Selected for Transfer, Permit 15079**  
**Permit Status: REVIEW**

## OCD District: Aztec

Property	Well Name	Lease Type	ULSTR	OCD Unit	API	Well Type	Pool ID	Pool Name	Last Prod/Inj	Addl Bond
30914	BOB BLANCHE #001	P	L-12-29N-15W	L	30-045-24743	O	11880	CHA CHA GALLUP	12/04	
30912	DOROTHY #001	P	I-11-29N-15W	I	30-045-24262	O	11880	CHA CHA GALLUP	12/04	
23856	FRUITLAND #001	P	I-3-29N-15W	I	30-045-24972	O			11/01	
23857	KIRTLAND #001	P	A-13-29N-15W	A	30-045-23470	G			07/02	
	KIRTLAND #002	P	B-13-29N-15W	B	30-045-23677	O			08/01	
	KIRTLAND #004	P	S-18-29N-14W	E	30-045-23716	O			12/04	
	KIRTLAND #005	P	I-12-29N-15W	J	30-045-24304	O			12/04	
	KIRTLAND #006	P	C-13-29N-15W	C	30-045-24448	O			07/02	
	KIRTLAND #007	P	D-13-29N-15W	D	30-045-24466	G			04/99	
	KIRTLAND #008	P	O-11-29N-15W	O	30-045-25028	G			04/99	
	KIRTLAND #009	P	K-12-29N-15W	K	30-045-25029	G			06/99	
	KIRTLAND #010	P	4-7-29N-14W	M	30-045-25027	O			12/04	
	KIRTLAND #011	P	3-18-29N-14W	C	30-045-25306	O			01/99	
23858	KIRTLAND 14 #001	P	A-14-29N-15W	A	30-045-25922	O	11880	CHA CHA GALLUP	12/04	
23859	KIRTLAND 18 #001	P	1-18-29N-14W	A	30-045-26203	O	11880	CHA CHA GALLUP	12/04	
	KIRTLAND 18 #003	P	2-18-29N-14W	B	30-045-23736	O			06/02	
30915	MOORE #001	P	E-12-29N-15W	E	30-045-24742	O			06/02	
30913	TRS-EVI #001	P	H-11-29N-15W	H	30-045-24633	O	11880	CHA CHA GALLUP	12/04	



**Patti L. Davis**

---

**From:** OCD Online System Administrator [ocdonline@state.nm.us]  
**Sent:** Thursday, September 01, 2005 6:13 PM  
**To:** pdavis@richardsonoil.com  
**Subject:** Operator Change

OCD has given final approval to the following Operator Change:

**From:** RICHARDSON OPERATING CO, 19219  
**To:** PETRO MEX LLC, 236452

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.

District III

1000 Rio Brazos Rd., Aztec, NM 87410

State of New Mexico  
Energy, Minerals and Natural Resources

Form C-104A  
Permit 15219

Oil Conservation Division  
1220 S. St Francis Dr.  
Santa Fe, NM 87505

Change of Operator

Previous Operator Information

OGRID: 19219  
Name: RICHARDSON OPERATING CO  
Address: 3100 La Plata Highway  
Address:  
City, State, Zip: Farmington, NM 87401

New Operator Information

Effective Date: 06/08/2005  
OGRID: 236452  
Name: PETRO MEX LLC  
Address: PO Box 6724  
Address:  
City, State, Zip: Farmington, NM 87499

I hereby certify that the rules of the Oil Conservation Division have been complied with and that the information on this form and the certified list of wells is true to the best of my knowledge and belief.

Previous Operator

Signature: Tom Bergin  
Printed Name: Tom Bergin  
Title: OPS mgr  
Date: 9-1-05 Phone: 307-330-7999

New Operator

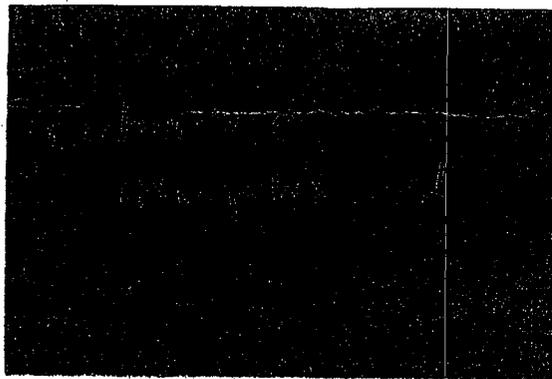
Signature: Jesus Villalobos  
Printed Name: Jesus Villalobos  
Title: President  
Date: 9-1-05 Phone: (505) 632-5948



From Operator: RICHARDSON OPERATING CO, 19219  
 To Operator: PETRO MEX LLC, 236452  
 Wells Selected for Transfer, Permit 15079  
 Permit Status: REVIEW

## OCD District: Aztec

Property	Well Name	Lease Type	ULSTR	OCD Unit	API	Well Type	Pool ID	Pool Name	Last Prod/Inj	Addl Bond
30914	BOB BLANCHE #001	P	L-12-29N-15W	L	30-045-24743	O	11880	CHA CHA GALLUP	12/04	
30912	DOROTHY #001	P	L-11-29N-15W	I	30-045-24262	O	11880	CHA CHA GALLUP	12/04	
23856	FRUITLAND #001	P	L-3-29N-15W	I	30-045-24972	O			11/01	
23857	KIRTLAND #001	P	A-13-29N-15W	A	30-045-23470	G			07/02	
	KIRTLAND #002	P	B-13-29N-15W	B	30-045-23677	O			08/01	
	KIRTLAND #004	P	S-18-29N-14W	E	30-045-23716	O			12/04	
	KIRTLAND #005	P	J-12-29N-15W	J	30-045-24304	O			12/04	
	KIRTLAND #006	P	C-13-29N-15W	C	30-045-24448	O			07/02	
	KIRTLAND #007	P	D-13-29N-15W	D	30-045-24466	G			04/99	
	KIRTLAND #008	P	O-11-29N-15W	O	30-045-25028	G			04/99	
	KIRTLAND #009	P	K-12-29N-15W	K	30-045-25029	G			06/99	
	KIRTLAND #010	P	4-7-29N-14W	M	30-045-25027	O			12/04	
	KIRTLAND #011	P	3-18-29N-14W	C	30-045-25306	O			01/99	
23858	KIRTLAND 14 #001	P	A-14-29N-15W	A	30-045-25922	O	11880	CHA CHA GALLUP	12/04	
23859	KIRTLAND 18 #001	P	1-18-29N-14W	A	30-045-26203	O	11880	CHA CHA GALLUP	12/04	
	KIRTLAND 18 #003	P	2-18-29N-14W	B	30-045-23736	O			06/02	
30915	MOORE #001	P	E-12-29N-15W	E	30-045-24742	O			06/02	
30913	TRS-EVI #001	P	H-11-29N-15W	H	30-045-24633	O	11880	CHA CHA GALLUP	12/04	



**Patti L. Davis**

---

**From:** OCD Online System Administrator [ocdonline@state.nm.us]  
**Sent:** Thursday, September 01, 2005 6:13 PM  
**To:** pdavis@richardsonoil.com  
**Subject:** Operator Change

OCD has given final approval to the following Operator Change:

**From:** RICHARDSON OPERATING CO, 19219  
**To:** PETRO MEX LLC, 236452

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

August 16, 2005

CERTIFIED MAIL  
RETURN RECEIPT NO: 7923 4597

Mr. Ryan Bruner  
Richardson Operation Company  
5600 South Quebec Street, Suite 130B  
Greenwood Village, CO 80111

**RE: INITIAL GROUNDWATER SITE INVESTIGATION PLAN  
BOB AND BLANCHE #1 SPILL  
3R0401**

Dear Mr. Bruner:

The New Mexico Oil Conservation Division (OCD) has received an initial groundwater site investigation plan (*Minimum Site Assessment Work Plan*) dated August 3, 2005, from the Richardson Operating Company (Richardson) regarding the Bob and Blanche No. 1 spill. Richardson submitted this ground water investigation work plan in response to OCD's letter of July 26, 2005. OCD required Richardson to submit "...a detailed ground water investigation work plan in accordance with OCD's 1993 guidance..." However, Richardson submitted a "*Minimum Site Assessment Work Plan*", prepared in accordance with the New Mexico Environment Department's Petroleum Storage Tank Bureau guidance.

OCD feels that it is very important that Richardson begin its ground water investigation as soon as possible, but because Richardson has not followed OCD's guidance as directed, the work plan must be revised before OCD can approve it. Richardson must submit a revised detailed ground water investigation work plan in accordance with OCD's 1993 guidance by August 26, 2005. Richardson's revised work plan must address the following issues.

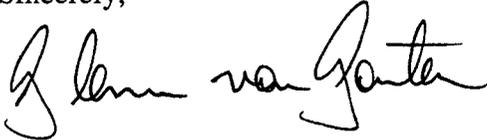
1. Richardson must follow OCD's 1993 Guidelines. Richardson must delete all irrelevant references to NMED's guidance and "Minimum Site Assessment."

2. Richardson must revise its proposed work plan in accordance with OCD's 1993 guidance to specify that it will delineate both the horizontal and vertical extent of any ground water and soil contamination.
3. Richardson must revise its proposed work plan in accordance with OCD's 1993 guidance to specify that all monitor wells will be constructed with fifteen (15) feet of well screen, with at least five (5) feet of the well screen above the water table to accommodate seasonal fluctuations in the static water table. If Richardson can document large seasonal fluctuations in the static water table, then it may wish to install monitor wells with longer well screens, but will need to modify its sampling and analysis procedures so that unacceptable dilution of the ground water does not occur during well sampling. If Richardson chooses to install monitor wells with 15 feet of screen and the water table fluctuates so that the water level drops below the base of the screened interval, then it must install additional monitor wells. Richardson must specifically address this contingency in its revised work plan.
4. Richardson's proposed location for its background monitor well is immediately adjacent to the spill site. Because of the possibility that mounding may occur beneath the release site, OCD recommends that Richardson site its background monitor well further to the north.
5. Richardson must revise its proposed work plan to specify that it will collect and analyze soil samples at least every 10 feet, at every major change in lithology, and at the vadose zone - water table interface.
6. Richardson must revise its proposed work plan in accordance with OCD's 1993 guidance to specify that it will analyze the soil samples for BTEX, TPH, volatile organic compounds (VOCs), and general chemistry, including chlorides.
7. Richardson must revise its proposed work plan in accordance with OCD's letter of July 26, 2005, to specify that it will delineate the full extent of the hydrocarbon plume to concentrations less than the WQCC Abatement Standards (20.6.2.3103 NMAC) using an appropriate number of isoconcentration maps and cross sections. Richardson must include these displays in its investigation report.
8. Richardson must revise its proposed work plan in accordance with OCD's letter of July 26, 2005, to propose additional contingent soil borings and monitor wells if this phase of its ground water investigation fails to completely delineate the release. Richardson must copy OCD's Aztec district office on all correspondence, work plans, reports, *etc.*
9. Richardson must revise its proposed work plan to specify that it will dispose of all development and purge water appropriately at an OCD approved facility.
10. Richardson must revise its proposed work plan to specify that it will submit a final ground water investigation report to OCD within 90 days of its receipt of OCD's approval of its work plan.

OCD will require Richardson to remediate any ground water contamination to meet WQCC standards. Therefore, it may be more cost effective for Richardson to implement a presumptive remediation program to be implemented concurrently with its ground water investigation.

If you have any questions, please call me at (505) 476-3488.

Sincerely,

A handwritten signature in cursive script that reads "Glenn von Gonten". The signature is written in black ink and is positioned above the printed name.

Glenn von Gonten  
Senior Hydrologist

xc: Denny Foust, OCD Aztec District Office



RECEIVED  
3R0401

**RICHARDSON OPERATING COMPANY**

AUG - 4 2005

5600 South Quebec Street, Suite 130B  
Greenwood Village, CO 80111  
(303) 830-8000 Fax (303) 830-8009

Oil Conservation Division  
Environmental Bureau

COPY

8/3/2005

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

**RE: Bob and Blanche #1 Spill**

Mr. Anderson,

Richardson Operating Company contacted EnviroTech after discovery of the spill, on June 18<sup>th</sup> 2005, and retained their services to perform remediation of the site. Remediation began on June 21<sup>st</sup> and work was completed on June 29<sup>th</sup> at a cost of over \$80,000 to Richardson Operating Company. We feel that this work is sufficient for the remediation of the site, however we will install groundwater monitoring wells and test for any further contamination.

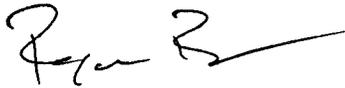
Enclosed is the initial groundwater site investigation plan prepared for Richardson Operating Company by EnviroTech. We have been working with David Young (505-632-0615) at EnviroTech to comply with your requests. After your review and approval of the plan, we will begin work as soon as possible. Please let us know if any changes need to be made to the plan. We will be glad to pass along any additional requirements or concerns on to EnviroTech.

In regards to your letter of Aug. 2, 2005 concerning the source of the released fluid, our field personnel inadvertently moved the fluids from the tanks on two plugged and abandoned locations to the tanks on the Bob & Blanche site. As a result of vandalism, the spill occurred at the site with all of the stored fluids. The Bob & Blanche had approximately 20bbl of fluid in the tanks before the fluid transfers. All fluid was BS&W and produced water. According to our field manager, Tom Bergin, fluid was removed from the following locations in the approximate volumes.

Kirtland #5 - 30-045-24304 - 110bbbls  
Fruitland #1 - 30-045-24972 - 70bbbls

If there is any other way I can be of help to you, or anything else you require please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Bruner", with a long horizontal flourish extending to the right.

Ryan Bruner  
Geologist  
Richardson Operating Company  
[rbruner@richardsonoil.com](mailto:rbruner@richardsonoil.com)



**RICHARDSON OPERATING COMPANY**

5600 South Quebec Street, Suite 130B  
Greenwood Village, CO 80111  
(303) 830-8000 Fax (303) 830-8009

RECEIVED

~~3R0401~~

AP040

AUG - 4 2005

Oil Conservation Division  
Environmental Bureau

8/3/2005

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

**RE: Bob and Blanche #1 Spill**

Mr. Anderson,

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Fruitland #1 – 30-045-24972 - 70bbbls

If there is any other way I can be of help to you, or anything else you require please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Bruner", with a long horizontal flourish extending to the right.

Ryan Bruner  
Geologist  
Richardson Operating Company  
[rbruner@richardsonoil.com](mailto:rbruner@richardsonoil.com)



NEW MEXICO ENERGY, MINERALS and  
NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**  
Governor  
**Joanna Prukop**  
Cabinet Secretary

3R0401

**Mark E. Fesmire, P.E.**  
Director  
Oil Conservation Division

August 2, 2005

7001 1940 0004 7923 4573

CERTIFIED MAIL  
RETURN RECEIPT NO: 7923 4573

Mr. Ryan Bruner  
Richardson Operation Company  
5600 South Quebec Street, Suite 130B  
Greenwood Village, CO 80111

**RE: BOB AND BLANCHE #1 SPILL**

Dear Mr. Bruner:

The New Mexico Oil Conservation Division (OCD) has received a letter dated July 28, 2005, from the Richardson Operating Company (Richardson) regarding the Bob and Blanche No. 1 spill. However, Richardson still has not provided all of the details that OCD requires. Richardson must also document the source of the oil, sediment, and produced water. It is not clear from either the Envirotech report, C-141, or your letter of July 28, 2005, whether the released fluids were associated with the Bob & Blanche No. 1 or from off-site. Richardson must provide the additional information by August 5, 2005. Failure to submit the required additional information will result in the issuance of a Notice of Violation.

If you have any questions, please call me at (505) 476-3490.

Sincerely,

Roger Anderson  
Environmental Bureau Chief

xc: Denny Foust, OCD Aztec District Office

3R0401

# Fax

**To:** Mr. Ryan Bruner  
Richardson Operating Company

**Fax:** 303-830-8009

**Pages:** 2, including this cover sheet.

**Date:** August 2, 2005

**RE:** Richardson Operating Bob & Blanch No. 1 spill.

If you have any questions, please call me at 505-476-3488.



Glenn von Gonten

Glenn von Gonten  
Senior Hydrologist  
Energy, Minerals and Natural Resources Department  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505  
505-476-3488  
Fax: 505-476-3462



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

August 2, 2005

CERTIFIED MAIL  
RETURN RECEIPT NO: 7923 4573

Mr. Ryan Bruner  
Richardson Operation Company  
5600 South Quebec Street, Suite 130B  
Greenwood Village, CO 80111

**RE: BOB AND BLANCHE #1 SPILL**

Dear Mr. Bruner:

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If you have any questions, please call me at (505) 476-3490.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger Anderson".

Roger Anderson  
Environmental Bureau Chief

xc: Denny Foust, OCD Aztec District Office



NEW MEXICO ENERGY, MINERALS and  
NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**  
Governor  
**Joanna Prukop**  
Cabinet Secretary

COPY

**Mark E. Fesmire, P.E.**  
Director  
Oil Conservation Division

August 2, 2005

3R041

CERTIFIED MAIL  
RETURN RECEIPT NO: 7923 4573

Mr. Ryan Bruner  
Richardson Operation Company  
5600 South Quebec Street, Suite 130B  
Greenwood Village, CO 80111

**RE: BOB AND BLANCHE #1 SPILL**

Dear Mr. Bruner:

The New Mexico Oil Conservation Division (OCD) has received a letter dated July 28, 2005, from the Richardson Operating Company (Richardson) regarding the Bob and Blanche No. 1 spill. However, Richardson still has not provided all of the details that OCD requires. Richardson must also document the source of the oil, sediment, and produced water. It is not clear from either the Envirotech report, C-141, or your letter of July 28, 2005, whether the released fluids were associated with the Bob & Blanche No. 1 or from off-site. Richardson must provide the additional information by August 5, 2005. Failure to submit the required additional information will result in the issuance of a Notice of Violation.

If you have any questions, please call me at (505) 476-3490.

Sincerely,

Roger Anderson  
Environmental Bureau Chief

xc: Denny Foust, OCD Aztec District Office



## RICHARDSON OPERATING COMPANY

---

5600 South Quebec Street, Suite 130B  
Greenwood Village, CO 80111  
(303) 830-8000 Fax (303) 830-8009

RECEIVED  
3R0401

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JUL 28 2005

Oil Conservation Division  
Environmental Bureau

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

**RE: Bob and Blanche #1 Spill**

Mr. Anderson,

In response to your letter of July 26, 2005, unfortunately I was not aware that you required a detailed groundwater investigation plan, the information regarding the cause of the spill and an explanation as to why Richardson Operating Company had not submitted a C-141. Hopefully I can supply you with the information you need in this letter.

I am currently working on creating a plan for the investigation of the possible groundwater contamination. I have contacted two environmental companies, who would do the majority of the work, to assist me with the plan, as this is not my area of expertise. EnviroTech would not be able to begin any work for at least two weeks. I am trying to find another company, which may be able to install the monitoring wells faster. I have also contacted Glenn Von Gonton, at your office, for any additional requirements and to be certain that the plan will meet with your satisfaction. The groundwater investigation plan will be submitted by your August 5, 2005 deadline.

The spill occurred sometime during the day on June 18, 2005. The landowner contacted our Farmington office after discovering the spill. Our field personnel inspected the site at approximately 3:00pm and found that a valve on one of the tanks was opened, causing the tank to drain into the below grade storage tank. The below grade tank overflowed and created the spill. The landowner had used the well pad for storage of agricultural equipment and left the gate unlocked, allowing anyone access to the site and the tanks. Upon discovery of the spill our field personnel contacted our WY field manager, Tom Bergin (our former NM field manager). Tom then contacted the landowner to decide what was needed to clean up this spill. It was then determined that the best course of action would be to contract EnviroTech to perform the remediation.

Unfortunately, we did not submit a C-141 immediately. We informed the NMOCD Aztec office right away, however we were not aware that your office needed to be contacted as well. I realize that ignorance of the rules is no excuse and I apologize for the tardiness of our report.

I hope that this letter is able to answer your requests. As I said we are working with environmental companies to prepare a groundwater investigation plan. We will submit this plan for your approval as soon as possible. If there is anything else you require please call me. I hope that we can work together to remediate any possible environmental impact as quickly as possible.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ryan Bruner', with a long horizontal flourish extending to the right.

Ryan Bruner  
Geologist  
Richardson Operating Company  
[rbruner@richardsonoil.com](mailto:rbruner@richardsonoil.com)



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**  
Governor  
**Joanna Prukop**  
Cabinet Secretary

3R0401

**Mark E. Fesmire, P.E.**  
Director  
**Oil Conservation Division**

July 26, 2005

CERTIFIED MAIL  
RETURN RECEIPT NO: 7923 4528

Mr. Ryan Bruner  
Richardson Operation Company  
5600 South Quebec Street, Suite 130B  
Greenwood Village, CO 80111

**RE: SPILL CLEANUP REPORT  
RICHARDSON OPERATING COMPANY  
BOB AND BLANCHE NO. 1**

Dear Mr. Bruner:

The New Mexico Oil Conservation Division (OCD) has received an OCD Form C-141 and *Spill Cleanup Report* for the Richardson Operating Company (Richardson) Bob and Blanche No. 1 submitted on July 25, 2005. However, Richardson has not addressed OCD's other requirements for the submission of a ground water investigation and remediation work plan and a written explanation of the events that led to the release. During my conversation with Ms. Patty Davis on July 22, 2005, I pointed out that Richardson was required to provide verbal and written notice to both OCD's Aztec district office and to the Environmental Bureau Chief. I informed Ms. Davis that Richardson must submit an OCD Form C-141 with a written explanation of the events that led to the release. I also informed Ms. Davis that, because the release had already impacted ground water, Richardson must immediately submit a ground water investigation work plan. I suggested that Mr. Glenn von Gonten of my staff should be contacted if Richardson had any questions about what was required.

Richardson has not submitted the required ground water investigation work plan and did not even address this requirement in its July 25, 2005 submittal. OCD hereby requires Richardson to submit a detailed ground water investigation work plan in accordance with OCD's 1993 guidance by August 5, 2005. Richardson must submit a ground water investigation plan to install a sufficient number of soil borings and monitoring wells to delineate the extent of the

ground water contamination. Richardson should be prepared to install as many monitoring wells as needed to delineate the full extent of the hydrocarbon plume to concentrations less than the WQCC Abatement Standards (20.6.2.3103 NMAC) using an appropriate number of isoconcentration maps and cross sections. Richardson must also propose additional contingent soil borings and monitor wells if this phase of its ground water investigation fails to completely delineate the release. After it has completely delineated the release, OCD will determine whether to require additional action from Richardson. Richardson may also propose a presumptive remediation program to be implemented concurrently with its ground water investigation. Richardson must also provide OCD with a written explanation of the events that led to the release and why it did not submit the required OCD Form C-141 by August 1, 2005.

If you have any questions, please call me at (505) 476-3490.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger Anderson", with a long horizontal flourish extending to the right.

Roger Anderson  
Environmental Bureau Chief

xc: Denny Foust, OCD Aztec District Office  
Glenn von Gonten, OCD Environmental Bureau

TRANSACTION REPORT

P. 01

JUL-26-2005 TUE 02:28 PM

FOR:

DATE	START	RECEIVER	TX TIME	PAGES	TYPE	NOTE	M#	DP
JUL-26	02:26 PM	AZTEC	1' 30"	2	SEND	OK	384	
TOTAL :						1M 30S	PAGES:	2

# Fax

**To:** Denny Faust, Henry Villanueva  
OCD-Aztec District

**Fax:** 505-334-6170

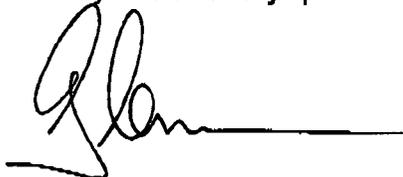
**Pages:** 2, including this cover sheet.

**Date:** July 26, 2005

Denny, Henry:

Here is the C-141 for the Richardson Operating Bob & Blanch No. 1 spill. <sup>e</sup> 3R0401

If you have any questions, please call me at 505-476-3488.



Glenn von Gonten

# Fax

**To:** Denny Faust, Henry Villanueva  
OCD-Aztec District

**Fax:** 505-334-6170

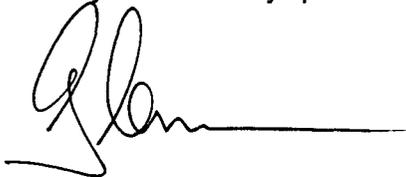
**Pages:** 2, including this cover sheet.

**Date:** July 26, 2005

Denny, Henry:

Here is the C-141 for the Richardson Operating Bob & Blanch No. 1 spill. <sup>e</sup> 3R0401

If you have any questions, please call me at 505-476-3488.



Glenn von Gonten

Glenn von Gonten  
Senior Hydrologist  
Energy, Minerals and Natural Resources Department  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505  
505-476-3488  
Fax: 505-476-3462



**RICHARDSON OPERATING COMPANY**

---

5600 South Quebec Street, Suite 130B  
Greenwood Village, CO 80111  
(303) 830-8000 Fax (303) 830-8009

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

RECEIVED  
3R0401

---

JUL 26 2005

Oil Conservation Division  
Environmental Bureau

**RE: Bob and Blanche #1 Spill**

Mr. Anderson,

Here is a copy of the EnviroTech Inc. spill cleanup report and C-141 information you requested, summarizing the spill and subsequent efforts at remediation. If there is any additional information you require please call Patti L. Davis or myself. Thank you for your guidance on restoring the site and remediating the impacted groundwater.

Sincerely,

Ryan Bruner  
Geologist  
Richardson Operating Company  
[rbruner@richardsonoil.com](mailto:rbruner@richardsonoil.com)

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

RECEIVED  
320401

Form C-141  
Revised October 10, 2003

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

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

JUL 26 2005

**Release Notification and Corrective Action**

**OPERATOR**

Initial Report  Final Report

Name of Company <b>Richardson Operating Company</b>	Contact <b>Patti L. Davis or Ryan Bruner</b>
Address <b>5600 S. Quebec St 130B, Greenwood Village, CO 80111</b>	Telephone No. <b>303-830-8000</b> Fax: <b>303-830-8009</b> <b>30-045-24743</b>
Facility Name <b>Bob &amp; Blanche #1</b>	Facility Type <b>Oil well with associated tank battery</b>
Surface Owner <b>Tim Foster</b>	Mineral Owner _____ Lease No. <b>Fee</b>

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<b>L</b>	<b>12</b>	<b>29N</b>	<b>15W</b>	<b>1830</b>	<b>South</b>	<b>660</b>	<b>West</b>	<b>San Juan</b>

Latitude \_\_\_\_\_ Longitude \_\_\_\_\_

**NATURE OF RELEASE**

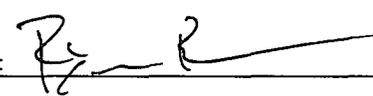
Type of Release <b>Oil, Sediment, &amp; Produced Water Spill</b>	Volume of Release <b>30bbl</b>	Volume Recovered <b>160bbl water, 1192 cubic feet of soil</b>
Source of Release <b>Open Valve on Tank</b>	Date and Hour of Occurrence <b>6/18/2005</b>	Date and Hour of Discovery <b>6/23/2005</b>
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully. \* **Spill reached an irrigation ditch adjacent to the location and flowed in the ditch approximately 225 feet from the source.**

Describe Cause of Problem and Remedial Action Taken. \* **A valve on the above ground tank failed, filling and then overflowing the below grade tank. All tanks and associated equipment have been removed from location.**

Describe Area Affected and Cleanup Action Taken. \* **The spill contaminated the area immediately surrounding the tanks, then flowed into a nearby irrigation ditch ending approximately 225' from the tanks. The spill also impacted rodent burrows, which spread the spill further underground. EnviroTech Inc. was contracted on June 21, 2005 to begin remediation of the site. EnviroTech evaluated the site and remediation began on June 22. Excavation and sampling of TPH were performed to determine the extent of the spill. Contaminated soil was removed to EnviroTech's landfarm and clean soil from the landfarm was used as fill. During excavation, impacted groundwater was reached. Standing liquid was removed by a vacuum truck, absorbent pads were placed near the tanks to contain further contamination. The excavated area was then treated with 100 gallons of potassium permanganate. Excavation and sampling continued until the TPH levels were within OCD limits. On June 28 & 29, standing water was again removed from the excavation site and treated with 200 gallons of potassium permanganate. The area was then backfilled and graded to restore the original site conditions. A total of 1192 cubic feet of impacted soil and 160 bbl of impacted groundwater were removed from the site and 1128 cubic feet of clean soil used as backfill. All tanks and equipment were removed from the site.**

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: 	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: <b>Ryan Bruner</b>	Approved by District Supervisor:	
Title: <b>Geologist</b>	Approval Date:	Expiration Date:
E-mail Address: <b>rbruner@richardsonoil.com</b>	Conditions of Approval:	Attached <input type="checkbox"/>
Date: <b>7/25/2005</b> Phone: <b>303-830-8000</b>		

\* Attach Additional Sheets If Necessary

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

3R0401

RECEIVED

JUL 26 2005

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  Digital Report  Final Report

Name of Company <b>Richardson Operating Company</b>	Contact <b>Patti L. Davis or Ryan Bruner</b>
Address <b>5600 S. Quebec St 130B, Greenwood Village, CO 80111</b>	Telephone No. <b>303-830-8000</b> Fax: <b>303-830-8009</b> <b>30-045-24743</b>
Facility Name <b>Bob &amp; Blanche #1</b>	Facility Type <b>Oil well with associated tank battery</b>

Surface Owner <b>Tim Foster</b>	Mineral Owner	Lease No. <b>Fee</b>
---------------------------------	---------------	----------------------

LOCATION OF RELEASE

Unit Letter <b>L</b>	Section <b>12</b>	Township <b>29N</b>	Range <b>15W</b>	Feet from the <b>1830</b>	North/South Line <b>South</b>	Feet from the <b>660</b>	East/West Line <b>West</b>	County <b>San Juan</b>
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Latitude \_\_\_\_\_ Longitude \_\_\_\_\_

NATURE OF RELEASE

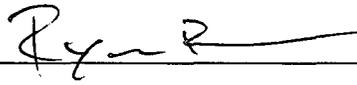
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By Whom?	Date and Hour	
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Signature: 	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: <b>Ryan Bruner</b>	Approved by District Supervisor:	
Title: <b>Geologist</b>	Approval Date:	Expiration Date:
E-mail Address: <b>rbruner@richardsonoil.com</b>	Conditions of Approval:	Attached <input type="checkbox"/>
Date: <b>7/25/2005</b> Phone: <b>303-830-8000</b>		

\* Attach Additional Sheets If Necessary

Y9700



COPY

3R0401

**RICHARDSON OPERATING COMPANY**

5600 South Quebec Street, Suite 130B  
Greenwood Village, CO 80111  
(303) 830-8000 Fax (303) 830-8009

Mr. Denny Foust  
NMOCD  
1000 Rio Brazos Road  
Aztec, NM 87410

RE: Bob & Blanche #1 spill



Dear Mr. Foust,

The remediation of the Bob & Blanche #1 spill has been completed. Enclosed is a sundry summarizing the work performed and a copy of the EnviroTech remediation report.

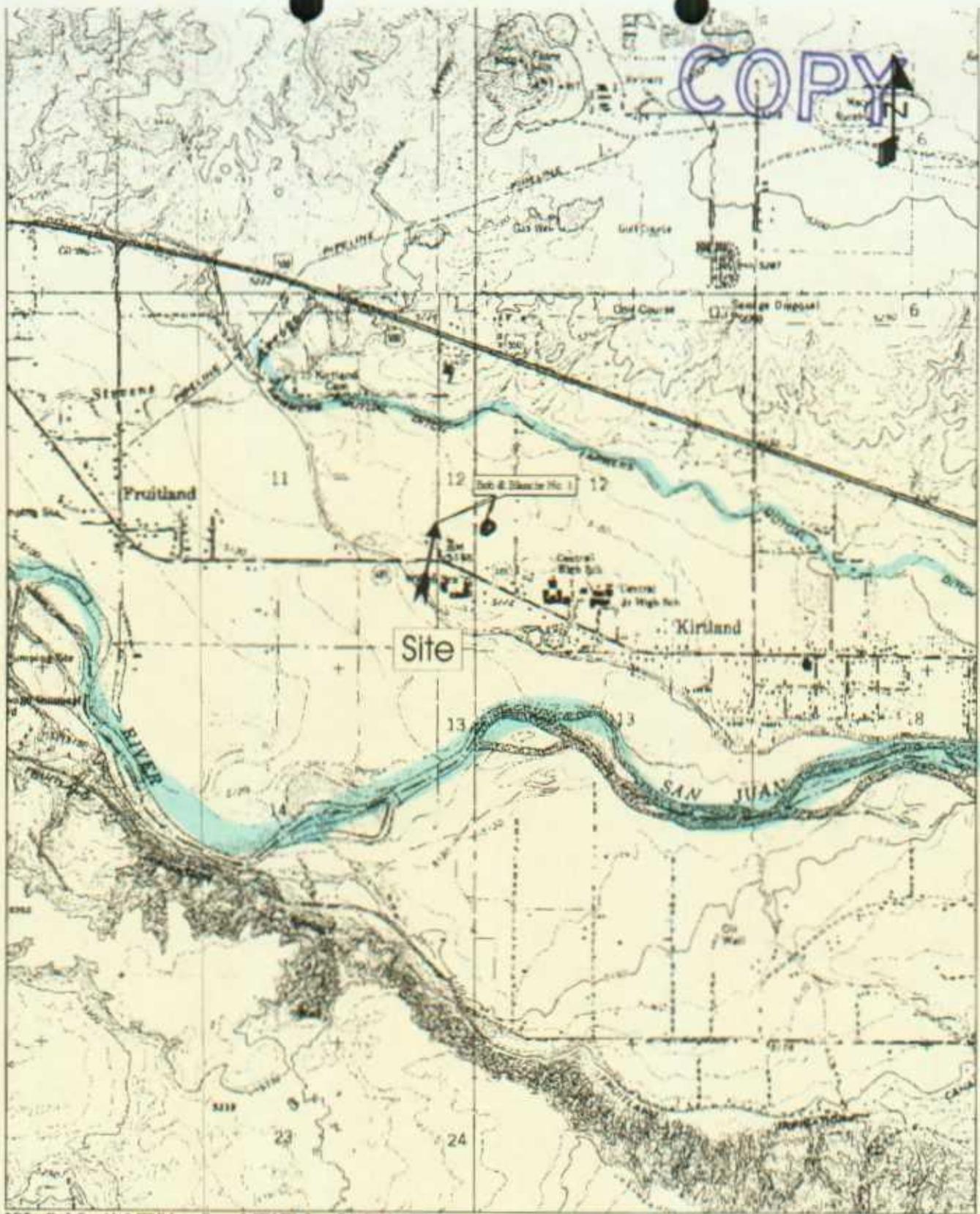
If you require any further information please call Patti Davis or myself and we will be glad to help.

GW IMPACTS

Thank you,

Ryan Bruner  
Geologist  
Richardson Operating Company  
303-830-8000  
[rbruner@richardsonoil.com](mailto:rbruner@richardsonoil.com)

COPY



1:0 TopoQuads Copyright © 1999 DeLorme Yarmouth, ME 04096 Source Data: USGS  
 750 ft Scale: 1:25,000 Contour: 10 ft Datum: NAD83

Bob & Blanche No. 1  
 Richardson Operating  
 Kirtland, New Mexico

**ENVIROTECH INC.**

ENVIRONMENTAL SCIENTISTS & ENGINEERS  
 5795 U.S. HIGHWAY 64  
 FARMINGTON, NEW MEXICO 87401  
 PHONE (505) 632-0615

Vicinity Map

Figure 1

DRAWN BY:  
 DMV

PROJECT MANAGER:  
 C. Jack Collins

PROJECT No. 98094-006 Date Drawn: 07/05/05

Need  
C-141  
**COPY**

Form C-103  
May 27, 2004

Submit 3 Copies To Appropriate District Office  
District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Ave., Artesia, NM 88210  
District III  
1000 Rio Brazos Rd., 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

WELL API NO. 30-045-24743
5. Indicate Type of Lease STATE <input type="checkbox"/> FEE <input checked="" type="checkbox"/>
6. State Oil & Gas Lease No.
7. Lease Name or Unit Agreement Name
8. Well Number Bob Blanche #1
9. OGRID Number 019219
10. Pool name or Wildcat Cha Cha Gallup

**SUNDRY NOTICES AND REPORTS ON WELLS**  
(DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE APPLICATION FOR PERMIT (FORM C-101) FOR SUCH PROPOSALS.)

1. Type of Well: Oil Well  Gas Well  Other

2. Name of Operator  
Richardson Operating Company

3. Address of Operator  
5600 S. Quebec St Suite 130B, Greenwood Village, CO 80111 303-830-8000

4. Well Location  
Unit Letter L : 1830 feet from the South line and 660 feet from the West line  
Section 12 Township 29N Range 15W NMPM County San Juan

11. Elevation (Show whether DR, RKB, RT, GR, etc.)

Pit or Below-grade Tank Application  or Closure

Pit type \_\_\_\_\_ Depth to Groundwater \_\_\_\_\_ Distance from nearest fresh water well \_\_\_\_\_ Distance from nearest surface water \_\_\_\_\_

Pit Liner Thickness: \_\_\_\_\_ mil Below-Grade Tank: Volume \_\_\_\_\_ bbls; Construction Material \_\_\_\_\_

12. Check Appropriate Box to Indicate Nature of Notice, Report or Other Data

<b>NOTICE OF INTENTION TO:</b>		<b>SUBSEQUENT REPORT OF:</b>	
PERFORM REMEDIAL WORK <input type="checkbox"/>	PLUG AND ABANDON <input type="checkbox"/>	REMEDIAL WORK <input checked="" type="checkbox"/>	ALTERING CASING <input type="checkbox"/>
TEMPORARILY ABANDON <input type="checkbox"/>	CHANGE PLANS <input type="checkbox"/>	COMMENCE DRILLING OPNS. <input type="checkbox"/>	P AND A <input type="checkbox"/>
PULL OR ALTER CASING <input type="checkbox"/>	MULTIPLE COMPL <input type="checkbox"/>	CASING/CEMENT JOB <input type="checkbox"/>	
OTHER: <input type="checkbox"/>		OTHER: <input type="checkbox"/>	

13. Describe proposed or completed operations. (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work). SEE RULE 1103. For Multiple Completions: Attach wellbore diagram of proposed completion or recompletion

Restoration of the Bob & Blanche site is complete. The EnviroTech report has been submitted with this sundry.

June 21, 2005 – EnviroTech contacted and spill assessed.  
 June 22, 2005 - EnviroTech begins excavation and sampling of the affected area. Test limits set by the OCD.  
 June 23 & 24, 2005 – Continued excavation and sampling of area. Groundwater impacted by spill and removed by a water truck. The area was then treated with 100 gallons of potassium permanganate.  
 June 27, 2005 – Separator, tanks, and lines removed from site. Excavation and sampling continued until soil tested met OCD requirements. Impacted soil removed to EnviroTech soil farm and replaced with clean soil from the soil farm.  
 June 28 & 29, 2005 – Standing liquids removed from area by vacuum truck. Area then treated with 200 gallons of potassium permanganate. Backfill excavations and restore site to original conditions. Total of 1192 cu yds of contaminated soil and 160 bbl of contaminated water were removed from the site and 1128 cu yds of clean backfill used to restore the site.

I hereby certify that the information above is true and complete to the best of my knowledge and belief. I further certify that any pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines , a general permit  or an (attached) alternative OCD-approved plan .

SIGNATURE Ryan Bruner TITLE Geologist DATE 7/14/2005

Type or print name Ryan Bruner E-mail address: rbruner@richardsonoil.com Telephone No. 303-830-8000  
**For State Use Only**

APPROVED BY: \_\_\_\_\_ TITLE \_\_\_\_\_ DATE \_\_\_\_\_  
Conditions of Approval (if any): \_\_\_\_\_

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State of New Mexico  
 Energy, Minerals and Natural Resources

Form C-103  
 May 27, 2004

OIL CONSERVATION DIVISION  
 1220 South St. Francis Dr.  
 Santa Fe, NM 87505

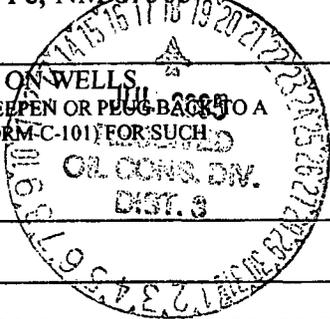
WELL API NO. 30-045-24743
5. Indicate Type of Lease STATE <input type="checkbox"/> FEE <input checked="" type="checkbox"/>
6. State Oil & Gas Lease No.
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10. Pool name or Wildcat Cha Cha Gallup

**SUNDRY NOTICES AND REPORTS ON WELLS**  
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Richardson Operating Company

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12. Check Appropriate Box to Indicate Nature of Notice, Report or Other Data

<b>NOTICE OF INTENTION TO:</b> PERFORM REMEDIAL WORK <input type="checkbox"/> PLUG AND ABANDON <input type="checkbox"/> TEMPORARILY ABANDON <input type="checkbox"/> CHANGE PLANS <input type="checkbox"/> PULL OR ALTER CASING <input type="checkbox"/> MULTIPLE COMPL <input type="checkbox"/> OTHER: <input type="checkbox"/>		<b>SUBSEQUENT REPORT OF:</b> REMEDIAL WORK <input checked="" type="checkbox"/> ALTERING CASING <input type="checkbox"/> COMMENCE DRILLING OPNS. <input type="checkbox"/> P AND A <input type="checkbox"/> CASING/CEMENT JOB <input type="checkbox"/> OTHER: <input type="checkbox"/>	
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SIGNATURE Ryan Bruner TITLE Geologist DATE 7/14/2005

Type or print name Ryan Bruner E-mail address: rbruner@richardsonoil.com Telephone No. 303-830-8000  
**For State Use Only**

APPROVED BY: \_\_\_\_\_ TITLE \_\_\_\_\_ DATE \_\_\_\_\_  
 Conditions of Approval (if any): \_\_\_\_\_

### INTRODUCTION

Envirotech, Inc. of Farmington, New Mexico, was contracted by Richardson Operating to clean up an oil, sediment, and produced water spill at the Bob and Blanche No. 1 well site. Activities included excavation of contaminated soil, confirmation sampling, backfill, and site restoration. The site is located on County Road 6100, in Kirtland, San Juan County, New Mexico; see *Figure 1, Vicinity Map*.

### ACTIVITIES PERFORMED

Envirotech, Inc. was contacted on Tuesday, June 21, 2005, with a request to respond to a spill at Richardson's Bob and Blanche No. 1 well site that resulted in the release of produced water, sediment, and oil from an above grade tank and a below grade tank at the location. Envirotech Personnel arrived on site in the afternoon of the same day for the initial site assessment. It was observed that, due to an open valve, the below grade tank had filled and overflowed, spilling on to surrounding soil and terminating in an adjacent irrigation ditch approximately 225 linear feet from the source, see *Figure 2, Site Map*. Several underground rodent burrows had also been impacted, facilitating the subterranean spread of released liquids.

On June 22, 2005, Envirotech Personnel returned to the site at approximately 7:30 am to begin excavation and confirmation sampling of the spill area. Excavation was performed in part by a backhoe and in part by an excavator, due to the size and extent of the excavation required. A front-end loader was also utilized to manage the contaminated soil staged at the site. Excavated contaminated soil was transported to Envirotech's Landfarm No. 2 Soil Remediation Facility. Clean virgin backfill was delivered to the site from that same facility.

NEED C-141

Due to the spill proximity to an agricultural water source, it was determined that a New Mexico Oil Conservation Division standard of 100 ppm for Total Petroleum Hydrocarbons (TPH) would be used for confirmation samples. During the removal of the contaminated soil, field headspace measurements were performed on discrete and composite samples of soil to screen for volatile organics using an Organic Vapor Meter (OVM). After these samples were screened, they were analyzed for Total Petroleum Hydrocarbons (TPH) by USEPA Method 418.1, see *Appendix A, Laboratory Analysis Documentation*.

Excavation and confirmation sampling began at the spill termination in the irrigation ditch and proceeded to a depth of 12 inches where the hydrocarbon odor was no longer present. One sample (S-1) was collected and analyzed at this depth. S-1 produced a field headspace measurement of 2 ppm (OVM) and then 16 ppm TPH. The small area was then backfilled to allow access to the primary zone of contamination. Excavation then began on the north side of the fence directly north of the below grade tank and proceeded to six (6) feet of depth where groundwater was encountered. The soil/groundwater interface established the maximum practical vertical extent of excavation. Excavation then proceeded in a northern direction to establish the northern and eastern extents of the contamination plume. At approximately 20 X 15 X 6 feet of depth, composite samples (S-2, S-3) were collected of the north and east walls. Analysis of these samples produced results that passed standards at 52 ppm TPH and 60 ppm TPH respectively, see *Table 1, Results of TPH Analysis*.

Excavation on June 23 and June 24 proceeded in a western direction after the north fence was removed. The western extent of the soil contamination was established and the excavation then proceeded along the northern portion of the ditch to a depth of three (3) feet. Confirmation samples were collected and analyzed (S-4, S-5, S-6, S-7) and all produced results that passed established standards, see *Table 1, Results of TPH Analysis*. The excavation at this point was approximately 20 X 80 X 6 feet of depth.

It was observed at this time that amber colored crude oil was present on the surface of the groundwater and further contamination from the black sludge was entering the water from the saturated soil near the below grade tank. A water truck was utilized to remove the standing liquid in the excavation. Absorbent

socks and pads were placed near the tank to contain the contamination. With NMOCD concurrence, the floor and northern wall of the excavation were treated with 100 gallons of a potassium permanganate, urea nitrate, and surfactant solution to aid in passive insitu remediation. This area was then partially backfilled and a temporary berm was created to prevent the backfill from being recontaminated.

On June 27, the separator, below grade tank, and associated piping were removed to facilitate excavation. Excavation then proceeded south and east at a depth of Six (6) feet until OVM screening suggested minimal levels of contamination remaining in the walls of the excavation. Three composite samples (S-8, S-9, S-10) were collected from the west, south, and east walls and analyzed for TPH. These samples passed standards at 76 ppm TPH, 88 ppm TPH, and 60 ppm TPH respectively. Excavation was then concluded.

During June 28 and June 29, the standing liquids in the excavation were again removed and the excavation was treated with 200 gallons of the aforementioned potassium solution. Backfill and grading activities were then performed to restore the site to original conditions, see *Appendix C, Site Photography*. All remaining contaminated material was removed from the site.

During the excavation and remediation activities, approximately 1192 cubic yards of contaminated soil and 160 barrels of contaminated groundwater were removed and transported to Envirotech Landfarm No. 2 and 1128 cubic yards of clean virgin backfill were delivered to the site from the same facility, see *Appendix B, Bills of Lading*.

#### SOIL IMPACT

Impacted soil was removed from all four walls of the excavation and the ditch until OVM and TPH levels were under 100 ppm. Maximum possible extent of excavation was reached at six (6) feet of depth when groundwater was encountered. This area was treated with a potassium permanganate solution, including both urea nitrate and a surfactant, for passive insitu remediation, and was backfilled with virgin clean fill.

#### GROUNDWATER IMPACT

Groundwater was encountered during this excavation at six (6) feet of depth. Two separate groundwater samples were collected near the site of excavation and analyzed via USEPA method 8021 for BTEX content. The analysis results show that groundwater has been impacted at the Bob and Blanche No. 1 well site. The reported levels of benzene, p,m-xylene, and o-xylene exceed the New Mexico Environmental Department groundwater quality standards (WQCC Human Health Standards, NMAC 20.6.2.3103 A), see *Appendix A, Laboratory Analysis Documentation*.

#### RECOMMENDATIONS

Contaminated soil was excavated to the horizontal extents of the soil contamination zone and the site was restored to match pre-accident grade. Due to the groundwater impact, Envirotech recommends that a site assessment be performed and monitor wells be placed to delineate the horizontal extent of groundwater contamination near the Bob and Blanche No. 1 well site in Kirtland, New Mexico. From this, the scope of remediation and/or monitoring efforts can then be determined.

#### STATEMENT OF LIMITATIONS

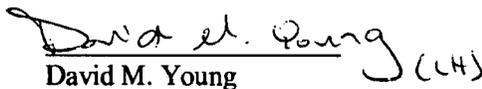
Envirotech has excavated soil impacted by hydrocarbons and produced water at Richardson's Bob and Blanche No. 1 in Kirtland, San Juan County, New Mexico. The work and services provided by Envirotech were in accordance with New Mexico Oil Conservation Division guidelines. All observations and conclusions provided here are based on the information and current site conditions found during this investigation.

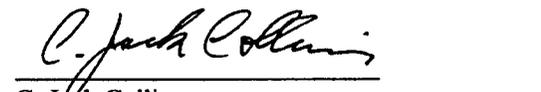
The undersigned has conducted this service at the above referenced site. This work has been conducted and reported in accordance with generally accepted professional practices in geology, engineering, environmental chemistry, and hydrogeology.

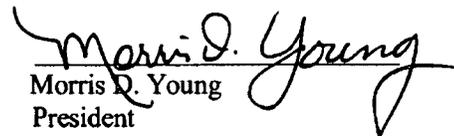
We appreciate the opportunity to be of service, if you have any questions or require any additional information, please contact our office at 505-632-0615.

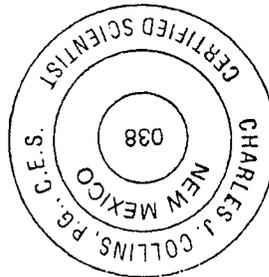
Respectfully Submitted,  
**ENVIROTECH, INC.**

Reviewed by:

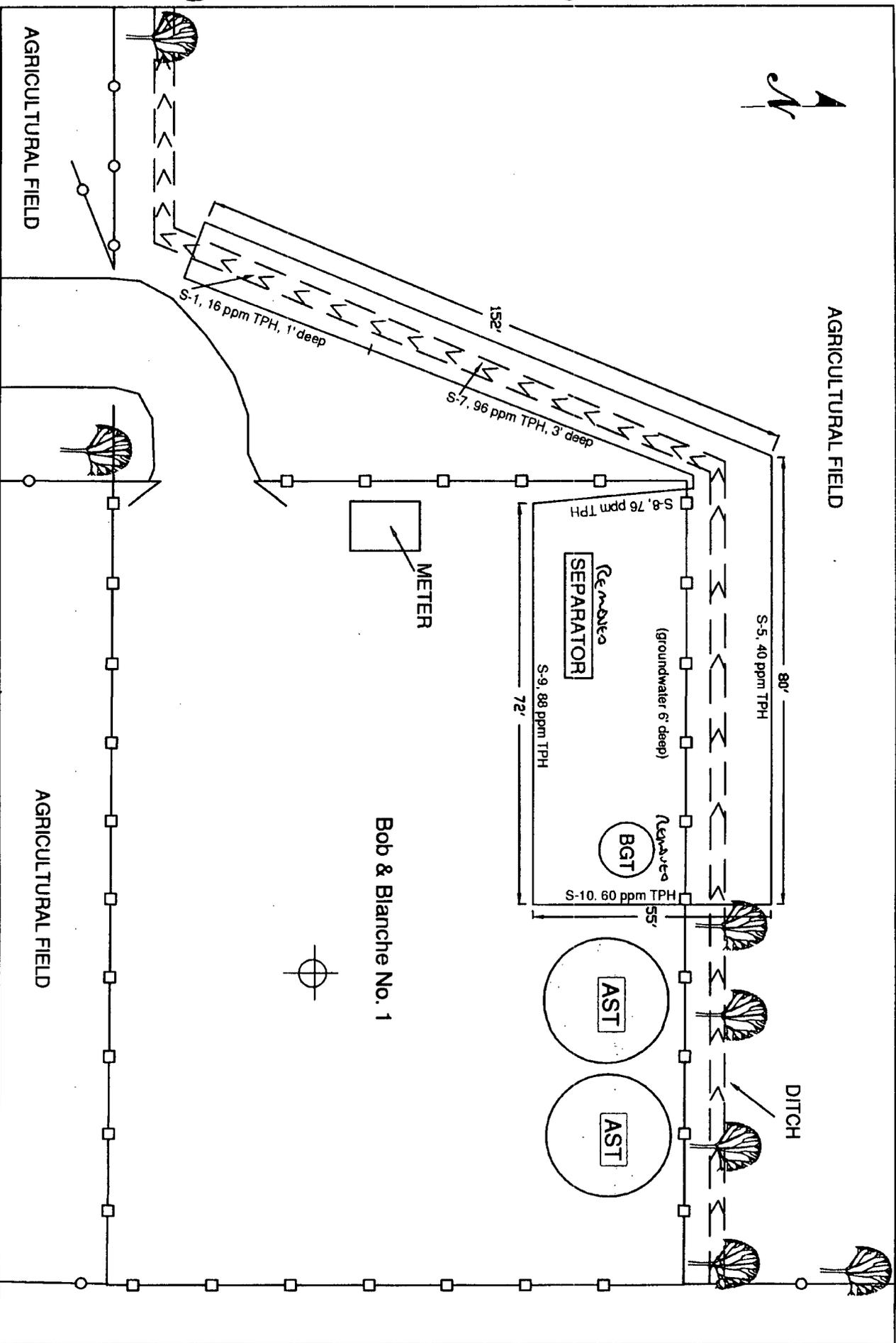
  
David M. Young  
Sr. Environmental Technician  
[dyoung@envirotech-inc.com](mailto:dyoung@envirotech-inc.com)

  
C. Jack Collins  
Chief Environmental Scientist/Hydrogeologist  
NMCES #038  
[jcollins@envirotech-inc.com](mailto:jcollins@envirotech-inc.com)

  
Morris D. Young  
President  
NMCES #098  
[myoung@envirotech-inc.com](mailto:myoung@envirotech-inc.com)



AGRICULTURAL FIELD



AGRICULTURAL FIELD

AGRICULTURAL FIELD

Bob & Blanche No. 1

**LEGEND**

- Excavated Area/ Extent of Spill
- Fence Line
- Closure Samples
- Direction of Drainage
- Trees
- Wellhead

Bob & Blanche No. 1  
Richardson Operating  
Kirtland, New Mexico

**ENVIROTECH INC.**  
ENVIRONMENTAL SCIENTISTS & ENGINEERS  
5706 U.S. HIGHWAY 64  
FARMINGTON, NEW MEXICO 87401  
(505) 632-0615

**SITE MAP**

REVISIONS  
BY \_\_\_\_\_ DATE \_\_\_\_\_  
Project No. 98094-006

DATE 07/06/05 DRAWN DMV FIGURE 2  
SCALE NTS APPROVED XXX

<b>Sample #</b>	<b>S Date</b>	<b>Description</b>	<b>S Depth</b>	<b>OVM (ppm)</b>	<b>TPH (ppm)</b>
S-1	06/22/05	composite, south ditch, floor and walls	12"	2	16
S-2	06/22/05	composite, north wall, (15' wide)	1'-6'	4	52
S-3	06/22/05	composite, east wall, (20' wide)	1'-6'	4	60
S-4	06/23/05	composite, north wall, (48' wide)	1'-6'	6	76
S-5	06/23/05	composite, north wall, (80' wide)	1'-6'	2	40
S-6	06/23/05	composite, west wall, (20' wide)	1'-6'	6	100
S-7	06/23/05	composite, north ditch, floor and walls	3'	6	96
S-8	06/27/05	composite, west wall, (55' wide)	1'-6'	6	76
S-9	06/27/05	composite, south wall, (72' wide)	1'-6'	6	88
S-10	06/27/05	composite, east wall, (55' wide)	1'-6'	4	60

## EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:	Richardson	Project #:	98094-006
Sample No.:	1	Date Reported:	7/7/2005
Sample ID:	Comp, South Ditch	Date Sampled:	6/22/2005
Sample Matrix:	Soil	Date Analyzed:	6/22/2005
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
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<b>Total Petroleum Hydrocarbons</b>	<b>16</b>	<b>5.0</b>
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ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: **Bob and Blanche No.1**

Instrument callibrated to 200 ppm standard. Zeroed before each sample

  
Analyst

  
Review

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

## EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:	Richardson	Project #:	98094-006
Sample No.:	2	Date Reported:	7/7/2005
Sample ID:	Comp, N wall, 15'	Date Sampled:	6/22/2005
Sample Matrix:	Soil	Date Analyzed:	6/22/2005
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
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<b>Total Petroleum Hydrocarbons</b>	<b>52</b>	<b>5.0</b>
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ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: **Bob and Blanche No.1**

Instrument callibrated to 200 ppm standard. Zeroed before each sample

*David Young*  
\_\_\_\_\_  
Analyst

*Justin Bennett*  
\_\_\_\_\_  
Review

EPA METHOD 418.1  
TOTAL PETROLEUM  
HYDROCARBONS

Client:	Richardson	Project #:	98094-006
Sample No.:	3	Date Reported:	7/7/2005
Sample ID:	Comp, E wall, 20'	Date Sampled:	6/22/2005
Sample Matrix:	Soil	Date Analyzed:	6/22/2005
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Total Petroleum Hydrocarbons	60	5.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: **Bob and Blanche No.1**

Instrument callibrated to 200 ppm standard. Zeroed before each sample

Analyst

*David Young*

Review

*Justin Barnett*

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

## CONTINUOUS CALIBRATION EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Cal. Date: 22-Jun-05

Parameter	Standard Concentration mg/L	Concentration Reading mg/L
TPH	100	202
	200	
	500	
	1000	

The accepted percent relative deviation (%RSD) of the calibration factor is less than 20% over the working range.

David Young  
Analyst

7-7-05  
Date

Justi Barnett  
Review

7/7/05  
Date

## EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:	Richardson	Project #:	98094-006
Sample No.:	4	Date Reported:	7/7/2005
Sample ID:	Comp, N wall, 48'	Date Sampled:	6/23/2005
Sample Matrix:	Soil	Date Analyzed:	6/23/2005
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Total Petroleum Hydrocarbons	76	5.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: **Bob and Blanche No.1**

Instrument callibrated to 200 ppm standard. Zeroed before each sample

  
\_\_\_\_\_  
Analyst

  
\_\_\_\_\_  
Review

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

## EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:	Richardson	Project #:	98094-006
Sample No.:	5	Date Reported:	7/7/2005
Sample ID:	Comp, N wall, 80'	Date Sampled:	6/23/2005
Sample Matrix:	Soil	Date Analyzed:	6/23/2005
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Total Petroleum Hydrocarbons	40	5.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: **Bob and Blanche No.1**

Instrument calibrated to 200 ppm standard. Zeroed before each sample

David Young  
Analyst

Justin Bant  
Review

EPA METHOD 418.1  
TOTAL PETROLEUM  
HYDROCARBONS

Client:	Richardson	Project #:	98094-006
Sample No.:	6	Date Reported:	7/7/2005
Sample ID:	Comp, W wall, 20'	Date Sampled:	6/23/2005
Sample Matrix:	Soil	Date Analyzed:	6/23/2005
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
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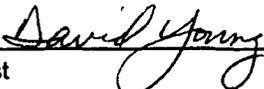
<b>Total Petroleum Hydrocarbons</b>	<b>100</b>	<b>5.0</b>
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ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: **Bob and Blanche No.1**

Instrument calibrated to 200 ppm standard. Zeroed before each sample

  
\_\_\_\_\_  
Analyst

  
\_\_\_\_\_  
Review

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

## EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:	Richardson	Project #:	98094-006
Sample No.:	7	Date Reported:	7/7/2005
Sample ID:	Comp, North Ditch	Date Sampled:	6/23/2005
Sample Matrix:	Soil	Date Analyzed:	6/23/2005
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
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<b>Total Petroleum Hydrocarbons</b>	<b>96</b>	<b>5.0</b>
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ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: **Bob and Blanche No.1**

Instrument callibrated to 200 ppm standard. Zeroed before each sample

David Young  
Analyst

Justin Barrett  
Review

CONTINUOUS CALIBRATION  
EPA METHOD 418.1  
TOTAL PETROLEUM  
HYDROCARBONS

Cal. Date: 23-Jun-05

Parameter	Standard Concentration mg/L	Concentration Reading mg/L
TPH	100	
	200	199
	500	
	1000	

The accepted percent relative deviation (%RSD) of the calibration factor is less than 20% over the working range.

David Young  
Analyst

7-7-05  
Date

Justin Barnett  
Review

7/7/05  
Date

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

## EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:	Richardson	Project #:	98094-006
Sample No.:	8	Date Reported:	7/7/2005
Sample ID:	Comp, W wall, 55'	Date Sampled:	6/27/2005
Sample Matrix:	Soil	Date Analyzed:	6/27/2005
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

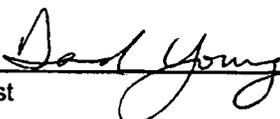
Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Total Petroleum Hydrocarbons	76	5.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: **Bob and Blanche No.1**

Instrument callibrated to 200 ppm standard. Zeroed before each sample

  
Analyst

  
Review

## EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:	Richardson	Project #:	98094-006
Sample No.:	9	Date Reported:	7/7/2005
Sample ID:	Comp, S wall, 72'	Date Sampled:	6/27/2005
Sample Matrix:	Soil	Date Analyzed:	6/27/2005
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
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<b>Total Petroleum Hydrocarbons</b>	<b>88</b>	<b>5.0</b>
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ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

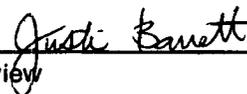
Comments: **Bob and Blanche No.1**

Instrument calibrated to 200 ppm standard. Zeroed before each sample

Analyst



Review



# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

## EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

Client:	Richardson	Project #:	98094-006
Sample No.:	10	Date Reported:	7/7/2005
Sample ID:	Comp, E wall, 55'	Date Sampled:	6/27/2005
Sample Matrix:	Soil	Date Analyzed:	6/27/2005
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
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<b>Total Petroleum Hydrocarbons</b>	<b>60</b>	<b>5.0</b>
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ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: **Bob and Blanche No.1**

Instrument callibrated to 200 ppm standard. Zeroed before each sample

*Sand Young*  
\_\_\_\_\_  
Analyst

*Justin Barrett*  
\_\_\_\_\_  
Review

CONTINUOUS CALIBRATION  
EPA METHOD 418.1  
TOTAL PETROLEUM  
HYDROCARBONS

Cal. Date: 27-Jun-05

Parameter	Standard Concentration mg/L	Concentration Reading mg/L
TPH	100	
	200	197
	500	
	1000	

The accepted percent relative deviation (%RSD) of the calibration factor is less than 20% over the working range.

      *Sand Young*        
Analyst

      7-7-05        
Date

      *Justin Bennett*        
Review

      7/7/05        
Date

# ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

## EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Client:	Richardson	Project #:	98094-006
Sample ID:	WS - 1	Date Reported:	06-29-05
Chain of Custody:	14233	Date Sampled:	06-27-05
Laboratory Number:	33506	Date Received:	06-28-05
Sample Matrix:	Water	Date Analyzed:	06-29-05
Preservative:	Cool	Analysis Requested:	BTEX
Condition:	Cool & Intact		

Parameter	Concentration (ug/L)	Dilution Factor	Det. Limit (ug/L)
Benzene (15)	207	1	0.2
Toluene	225	1	0.2
Ethylbenzene	66.9	1	0.2
p,m-Xylene	566	1	0.2
o-Xylene (650)	379	1	0.1
	<u>945</u>		
<b>Total BTEX</b>	<b>1,440</b>		

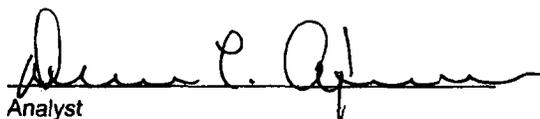
ND - Parameter not detected at the stated detection limit.

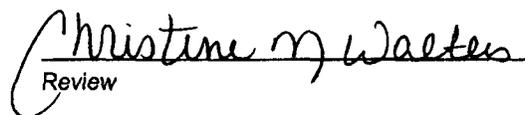
Surrogate Recoveries:	Parameter	Percent Recovery
	fluorobenzene	99 %
	1,4-difluorobenzene	99 %
	4-bromochlorobenzene	99 %

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Method 8021B, Aromatic and Halogenated Volatiles by Gas Chromatography Using Photoionization and/or Electrolytic Conductivity Detectors, SW-846, USEPA December 1996.

Comments: B & B No. 1 (Kirtland).

  
Analyst

  
Review

# ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

## EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Client:	Richardson	Project #:	98094-006
Sample ID:	WS - 2	Date Reported:	06-29-05
Chain of Custody:	14233	Date Sampled:	06-27-05
Laboratory Number:	33507	Date Received:	06-28-05
Sample Matrix:	Water	Date Analyzed:	06-29-05
Preservative:	Cool	Analysis Requested:	BTEX
Condition:	Cool & Intact		

Parameter	Concentration (ug/L)	Dilution Factor	Det. Limit (ug/L)
Benzene	145	1	0.2
Toluene	346	1	0.2
Ethylbenzene	33.3	1	0.2
p,m-Xylene	235	1	0.2
o-Xylene	177	1	0.1
	<u>412</u>		
<b>Total BTEX</b>	<b>936</b>		

ND - Parameter not detected at the stated detection limit.

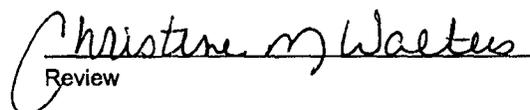
Surrogate Recoveries:	Parameter	Percent Recovery
	fluorobenzene	99 %
	1,4-difluorobenzene	99 %
	4-bromochlorobenzene	99 %

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Method 8021B, Aromatic and Halogenated Volatiles by Gas Chromatography Using Photoionization and/or Electrolytic Conductivity Detectors, SW-846, USEPA December 1996.

Comments: B & B No. 1 (Kirtland).

  
Analyst

  
Review

# ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

## EPA METHOD 8021 AROMATIC VOLATILE ORGANICS QUALITY ASSURANCE REPORT

Client:	N/A	Project #:	N/A
Sample ID:	06-29-BTEX QA/QC	Date Reported:	06-29-05
Laboratory Number:	33506	Date Sampled:	N/A
Sample Matrix:	Water	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	06-29-05
Condition:	N/A	Analysis:	BTEX

Calibration and Detection Limit (ug/L)	I-Cal RF	C-Cal RF	%Diff	Blank Conc	Detect Limit
		Accept Range	0 - 15%		
Benzene	2.0178E+007	2.0238E+007	0.30%	ND	0.2
Toluene	5.6370E+007	5.6540E+007	0.30%	ND	0.2
Ethylbenzene	4.3370E+007	4.3501E+007	0.30%	ND	0.2
p,m-Xylene	8.7981E+007	8.8245E+007	0.30%	ND	0.2
o-Xylene	4.4276E+007	4.4409E+007	0.30%	ND	0.1

Duplicate Conc. (ug/L)	Sample	Duplicate	%Diff	Accept Limit
Benzene	207	206	0.5%	0 - 30%
Toluene	225	224	0.5%	0 - 30%
Ethylbenzene	66.9	66.6	0.4%	0 - 30%
p,m-Xylene	566	563	0.5%	0 - 30%
o-Xylene	379	377	0.5%	0 - 30%

Spike Conc. (ug/L)	Sample	Amount Spiked	Spiked Sample	% Recovery	Accept Limits
Benzene	207	50.0	256	99.6%	39 - 150
Toluene	225	50.0	274	99.6%	46 - 148
Ethylbenzene	66.9	50.0	116	99.6%	32 - 160
p,m-Xylene	566	100	665	99.8%	46 - 148
o-Xylene	379	50.0	428	99.7%	46 - 148

ND - Parameter not detected at the stated detection limit.

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.  
Method 8021B, Aromatic and Halogenated Volatiles by Gas Chromatography Using Photoionization and/or Electrolytic Conductivity Detectors, SW-846, USEPA December 1996.

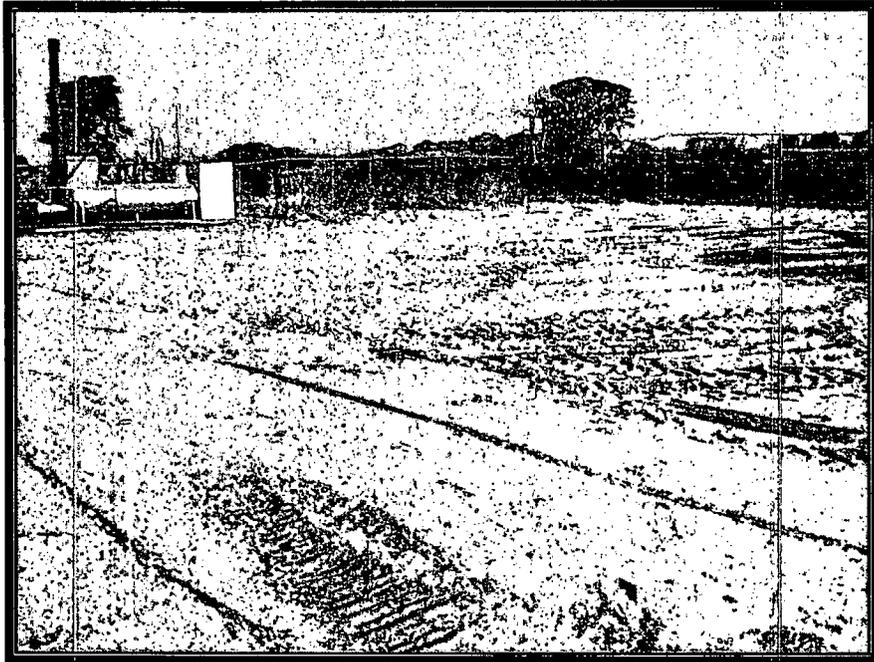
Comments: QA/QC for samples 33506 - 33507.

Analyst

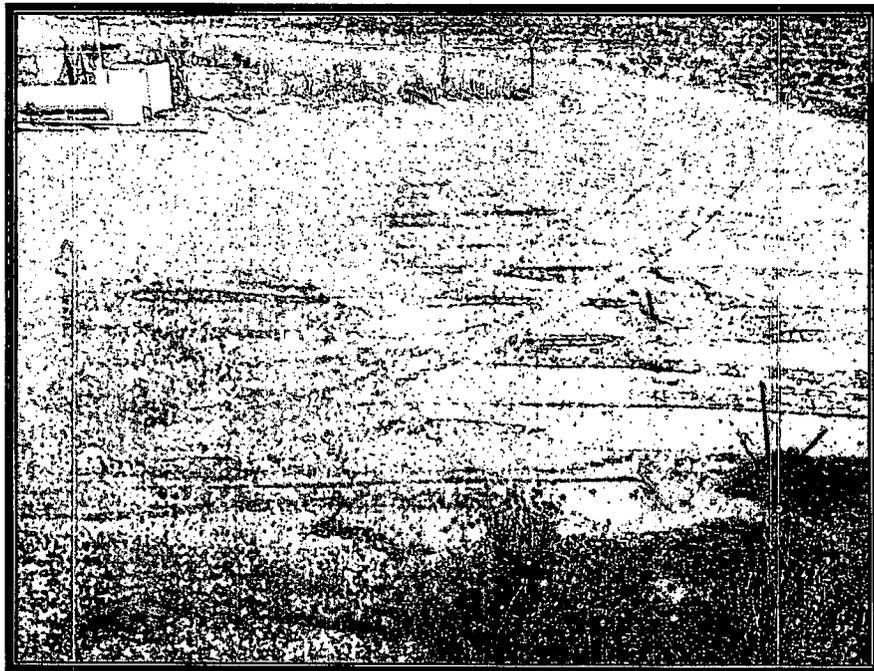
Review



**RICHARDSON OPERATING  
SPILL CLEANUP REPORT  
BOB AND BLANCHE NO. 1**

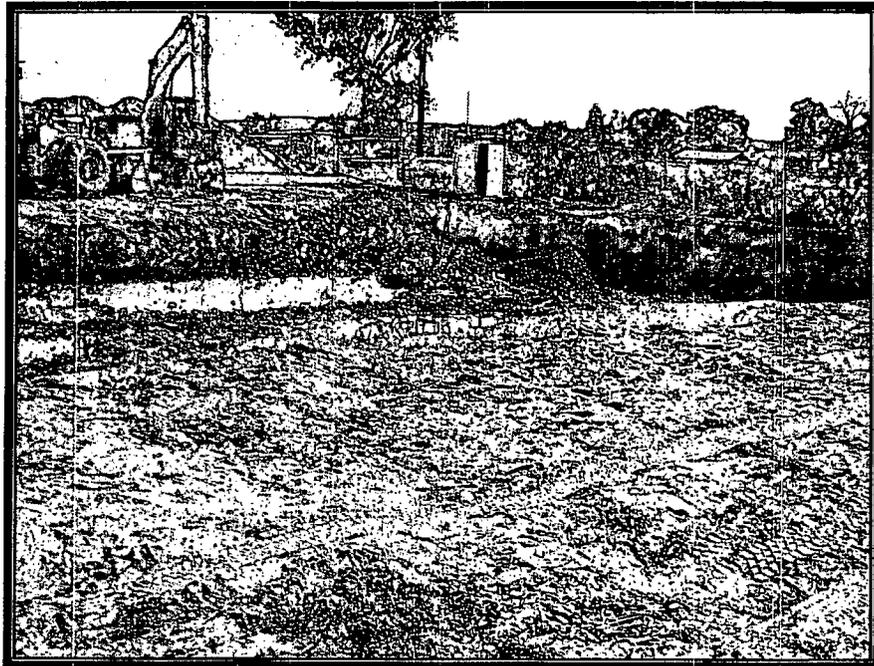


**Photo 13: Restored Grade, View from Southeast**

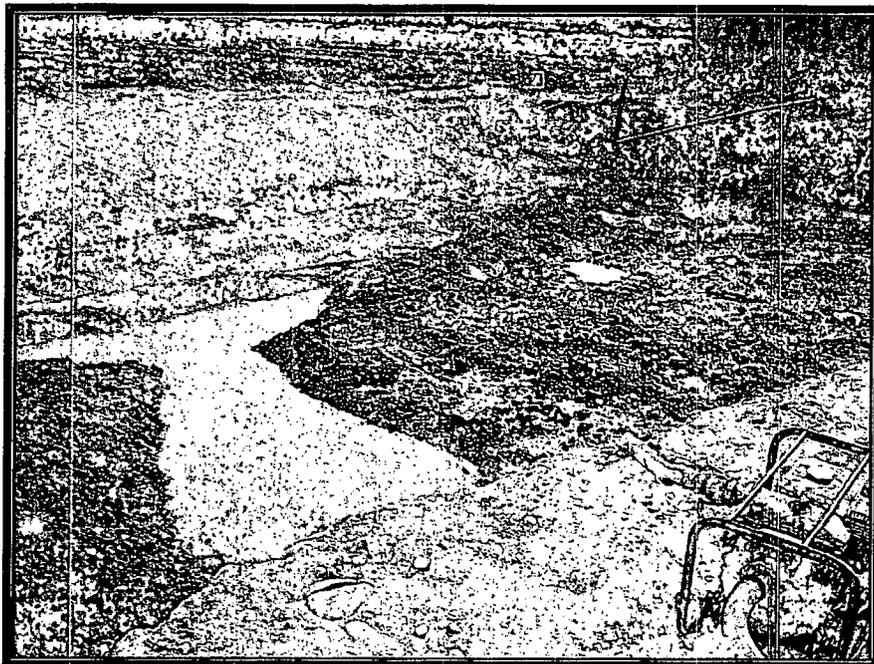


**Photo 14: Restored Grade, View from East**

**RICHARDSON OPERATING  
SPILL CLEANUP REPORT  
BOB AND BLANCHE NO. 1**



**Photo 11: Completion of Excavation, West Side, View from North**

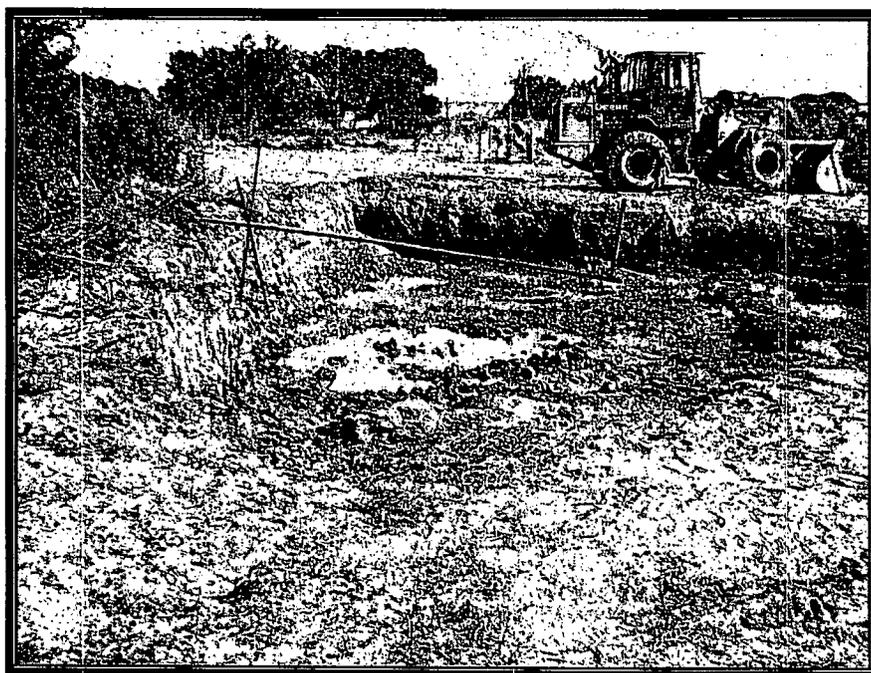


**Photo 12: Final Treatment with Potassium Permanganate Solution**

**RICHARDSON OPERATING  
SPILL CLEANUP REPORT  
BOB AND BLANCHE NO. 1**



**Photo 9: Additional Contamination from a Pipe Leak under the Separator**

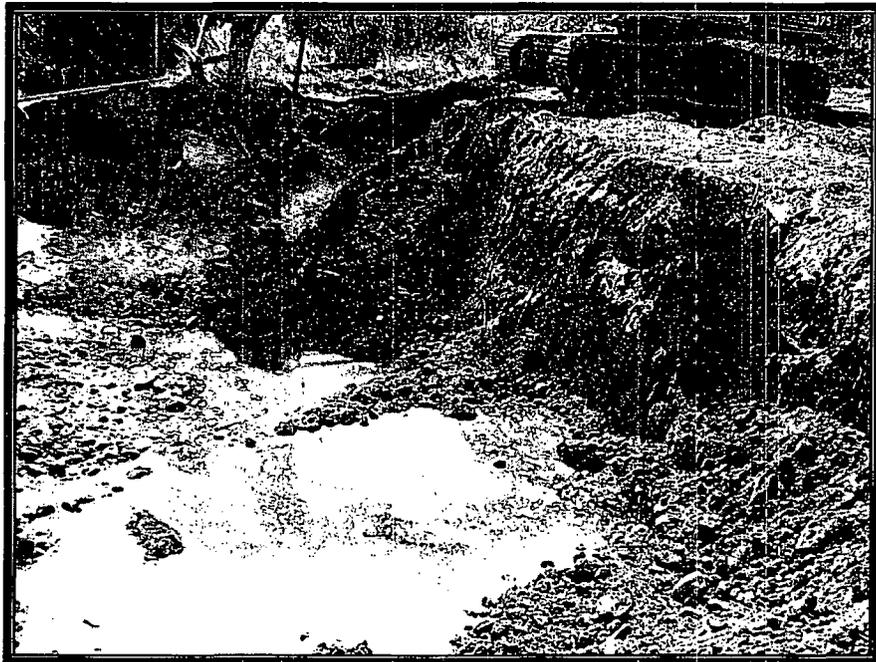


**Photo 10: Completion of Excavation, East Side, View from North**

**RICHARDSON OPERATING  
SPILL CLEANUP REPORT  
BOB AND BLANCHE NO. 1**



**Photo 7: Absorbent Devices Placed to Prevent Further Leeching of Contamination into Groundwater**



**Photo 8: Removing Contaminated Soil on South Side of Excavation**

**RICHARDSON OPERATING  
SPILL CLEANUP REPORT  
BOB AND BLANCHE NO. 1**

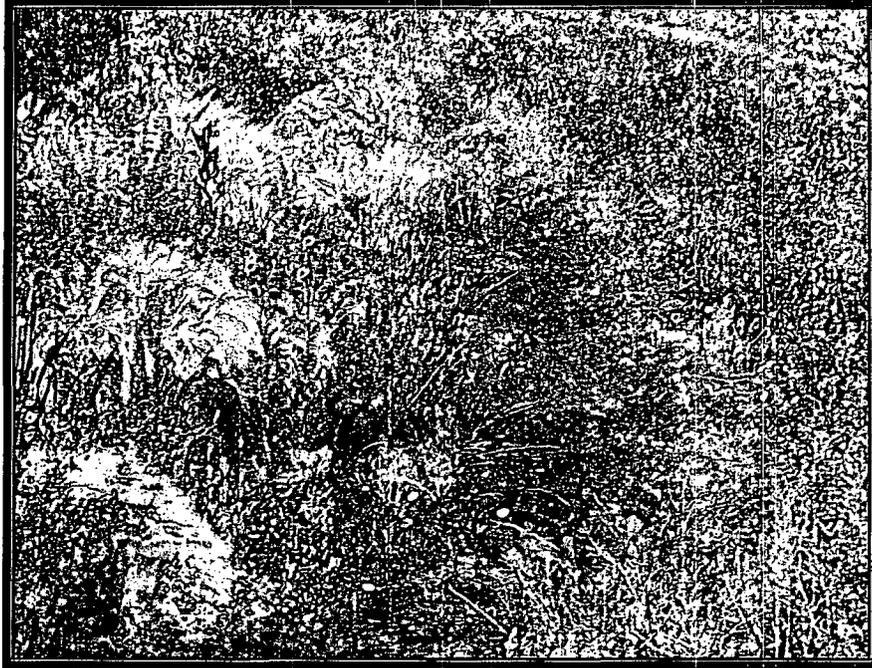


**Photo 5: Initiating Excavation of Irrigation Ditch**

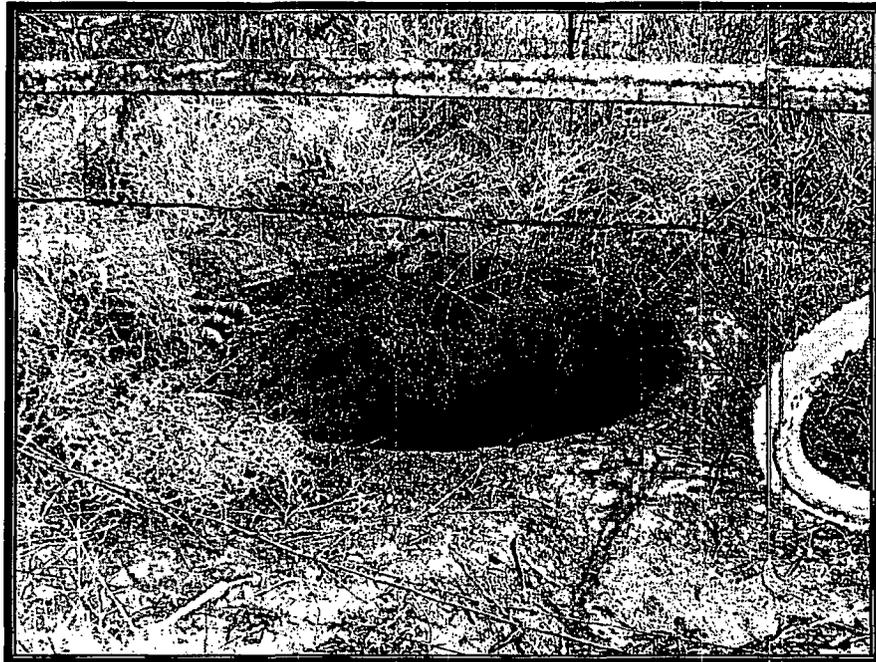


**Photo 6: Contamination Impacted Rodent Burrows**

**RICHARDSON OPERATING  
SPILL CLEANUP REPORT  
BOB AND BLANCHE NO. 1**

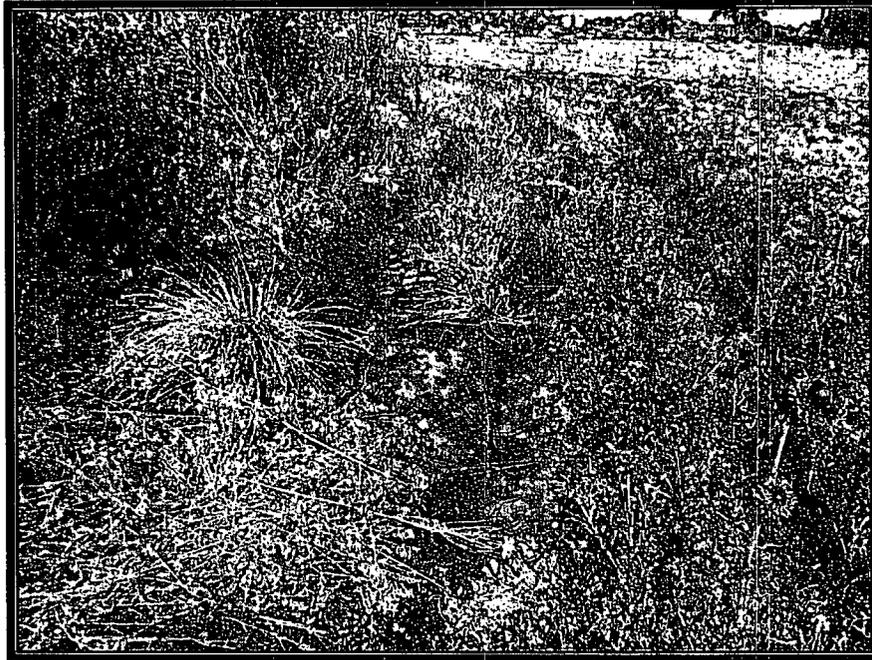


**Photo 3: Spill Mobilization along Irrigation Ditch**



**Photo 4: Spill source Area, Below Grade Tank**

**RICHARDSON OPERATING  
SPILL CLEANUP REPORT  
BOB AND BLANCHE NO. 1**

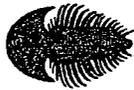


**Photo 1: Spill, North Side of Fence, View from East**



**Photo 2: Spill, North Side of Fence, View from West**

Y9900  
COPY



COPY

3R0401

**RICHARDSON OPERATING COMPANY**

5600 South Quebec Street, Suite 130B  
Greenwood Village, CO 80111  
(303) 830-8000 Fax (303) 830-8009

Mr. Denny Foust  
NMOCD  
1000 Rio Brazos Road  
Aztec, NM 87410

RE: Bob & Blanche #1 spill



Dear Mr. Foust,

The remediation of the Bob & Blanche #1 spill has been completed. Enclosed is a sundry summarizing the work performed and a copy of the EnviroTech remediation report.

If you require any further information please call Patti Davis or myself and we will be glad to help.

GW IMPACTS

Thank you,

Ryan Bruner  
Geologist  
Richardson Operating Company  
303-830-8000  
[rbruner@richardsonoil.com](mailto:rbruner@richardsonoil.com)