

1R - 426-214

REPORTS

DATE:

9-10-13

RICE *Operating Company*

122 West Taylor • Hobbs, New Mexico 88240
Phone: (575) 393-9174 • Fax: (575) 397-1471

RECEIVED OOD

09/10/2013 1:43

CERTIFIED MAIL
RETURN RECEIPT NO. 7007 2560 0003 0320 5433

September 10, 2013

Mr. Edward Hansen
New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

RE: CAP Report and Termination Request
BD F-26 vent (1R426-214): Unit Letter F, Section 26, T21S, R37E
RICE Operating Company – Blinebry Drinkard (BD) SWD System

Mr. Hansen:

Rice Operating Company (ROC) submits the following CAP Report and Termination Request for the BD F-26 vent site, located in Unit Letter F, Section 26, T21S, R37E in Lea County, New Mexico. See Figure 1 for site location. Rice Operating Company (ROC) is the service provider (agent) for the BD Saltwater Disposal (SWD) System and has no ownership of any portion of the pipeline, well, or facility. The System is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

Background

As part of the ROC Junction Box Upgrade Work plan, starting on January 22, 2008, the junction box was eliminated during the pipeline replacement/upgrade program. The former junction box site was excavated to dimensions of 30 feet by 15 feet by 12 feet deep with a backhoe. PID readings and chloride field tests were conducted at regular intervals. Based on the field PID readings, TPH did not exhibit a decrease with depth. Chloride concentrations increased with depth and ranged from 1,431 milligrams per kilograms (mg/kg) at 4 feet below ground surface (bgs) to 3,149 mg/kg at 12 feet bgs. A four point composite sample for the walls was collected and submitted for analysis of TPH and chlorides. Analytical results showed a GRO reading of non-detect and a DRO reading of 963 mg/kg with a chloride concentration of 768 mg/kg. A five point bottom composite sample was collected and submitted for analysis of BTEX, TPH, and chlorides. Analytical results showed a benzene concentration of <0.020 mg/kg, a toluene concentration of 0.126, an ethyl benzene concentration of 0.706, and a total xylenes concentration of 2.17. The GRO reading was 43.9 and the DRO reading was 764 with a chloride concentration of 368 mg/kg.

Upon completion of the excavation, the soils were blended and placed back into the excavation. Laboratory analysis of the blended backfill sample resulted in a GRO reading of 12.9 mg/kg, DRO reading of 872 mg/kg, and a chloride concentration of 784 mg/kg. The excavation was then

brought up to surface grade. On February 1, 2008, the site was seeded with a blend of native vegetation. On August 18, 2008, an email was submitted to the NMOCD informing of a potential groundwater impact to the site. In March 2009, ROC submitted a Junction Box Disclosure Report to the NMOCD with all the 2008 junction box closure and disclosure reports.

On October 1, 2009, ROC submitted the ICP, and in an email dated January 28, 2010, the NMOCD approved the ICP.

On March 22, 2010, ROC was onsite to oversee the installation of three soil borings (SB-1 through SB-3) within and around the former junction box location. Soil samples were collected every 5 feet beginning at a depth of 15 feet below ground surface (bgs). Samples were collected from cuttings and were field screened for TPH utilizing a photo-ionization detector (PID) and for chlorides with a field sampling kit. Field results indicate the soil chloride concentrations decrease with depth in SB-1 to a concentration of 16 mg/kg at 40 ft. bgs. TPH concentrations in SB-1 also decreased with depth with a GRO concentration below detectable limit and a DRO concentration of 17.7 mg/kg at 40 ft. bgs. TPH concentrations were below detectable limits in SB-2 and SB-3. Soil chloride concentrations in SB-3 remained low with depth with all samples being less than 240 mg/kg. Elevated soil chloride concentrations were observed in SB-2.

In order to determine if groundwater was impacted from the former junction box, one monitor well was installed (MW-1) to the southeast of the excavated junction box to a depth of 57 feet bgs on March 23, 2010. On November 18, 2010, an up gradient monitor well (MW-2) was installed northwest of the existing tank battery. Groundwater was encountered at approximately 45 feet bgs. Upon completion, the monitor wells were developed and samples were submitted to Cardinal Labs of Hobbs, New Mexico for analysis of chlorides utilizing EPA standard 4500Cl-B and BTEX utilizing EPA method 8021B. Initial results showed a chloride concentration of 1,060 mg/L in MW-1 on April 20, 2010, and 1,300 mg/L in MW-2 on December 3, 2010. This proves that a non-ROC, up-gradient site is contributing to the degradation of groundwater quality. Chloride concentrations in MW-1 have since averaged 1,519 mg/L and MW-2 has averaged 1,224 mg/L. No BTEX was detected in either of the two monitoring wells. This suggests the chloride impacted groundwater is now moving across the F-26 vent site.

On April 18, 2013, ROC submitted a report entitled; ICP Report and Corrective Action Plan (CAP), to the NMOCD and an Addendum was submitted on May 8, 2013. According to the CAP and Addendum, ROC would excavate a 43 foot by 30 foot area, with the northeast corner cut off to remain a safe distance from an underground electrical line, to a depth of approximately 4 to 5 feet bgs, and install a 20 mil reinforced polyethylene liner. The report also proposed removing a chloride mass of 415 kilograms (kg) from the existing recovery systems located at BD O-23 vent and BD O-23-1 vent. The CAP and Addendum were approved by the NMOCD on May 8, 2013.

Chloride Mass Removal

Groundwater recovery efforts began on May 9, 2013, from BD O-23 vent and BD O-23-1 vent. Approximately 310 barrels of chloride impacted groundwater were removed from BD O-23 vent. With a chloride concentration of 10,700 mg/L, this equates to 527 kg of chloride. Approximately 431 barrels of chloride impacted groundwater were removed from BD O-23-1 vent. With a chloride concentration 3,900 mg/L, this equates to 267 kg of chloride. Together, the two recovery systems removed 794 kg of chloride. The removed groundwater was utilized for pipeline and well maintenance. The groundwater withdrawal sheet and lab results for O-23 vent and O-23-1 vent are included in Appendix A.

Liner Installation

Beginning on July 1, 2013, RECS personnel were on site to begin the excavation for the 20-mil reinforced polyethylene liner installation. The site was excavated to 43 ft x 30 ft, as shown on the attached Figure 2, to a depth of 5 ft. A total of 276 yards of excavated soil was taken to a NMOCD approved facility for disposal, and a total of 228 yards of clean soil were imported to serve as pad and backfill material. The imported blow sand was used to pad the bottom of the excavation to protect the liner from punctures. The liner was installed and properly seated into the excavation at approximately 4.5 ft bgs. The remainder of the blow sand was used to pad above the liner and to backfill the excavation. A sample of the imported soil was field tested for hydrocarbons and returned a result of 74.4 ppm. The sample was then taken to a commercial laboratory for analysis of chlorides, which returned a result below detectable limit. The excavation was backfilled to ground surface and contoured to the surrounding area.

Silt net fencing was placed around the backfilled area to provide protection from wind erosion and maintain seed integrity. On July 11 and 12, 2013, the site was disked and soil amendments were added to the top soil portions of the site. The site was seeded with a blend of native vegetation and is beginning to recover. The lab result, PID sheet, revegetation form, and photo documentation are included in Appendix B.

Based on the completion activities performed at the site, ROC acknowledges they have met the requirements of 19.15.29 NMAC for this project. Upon NMOCD approval, monitor well MW-1 will be plugged using a cement grout with 1 to 3% bentonite and a 3-foot cap of cement to the surface. MW-2 will remain open to monitor up-gradient groundwater quality. Upon completion of these activities, a Monitor Well Plugging Report will be submitted to the NMOCD.

Please contact me at (575) 631-6432 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,
RICE Operating Company



Hack Conder
Environmental Manager

enclosures

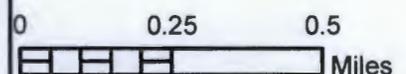


BD F-26 vent

U/ N, Section 20, T21S, R37E
LEA COUNTY, NM

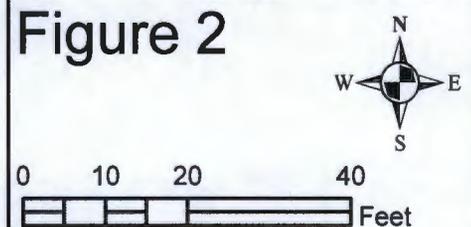
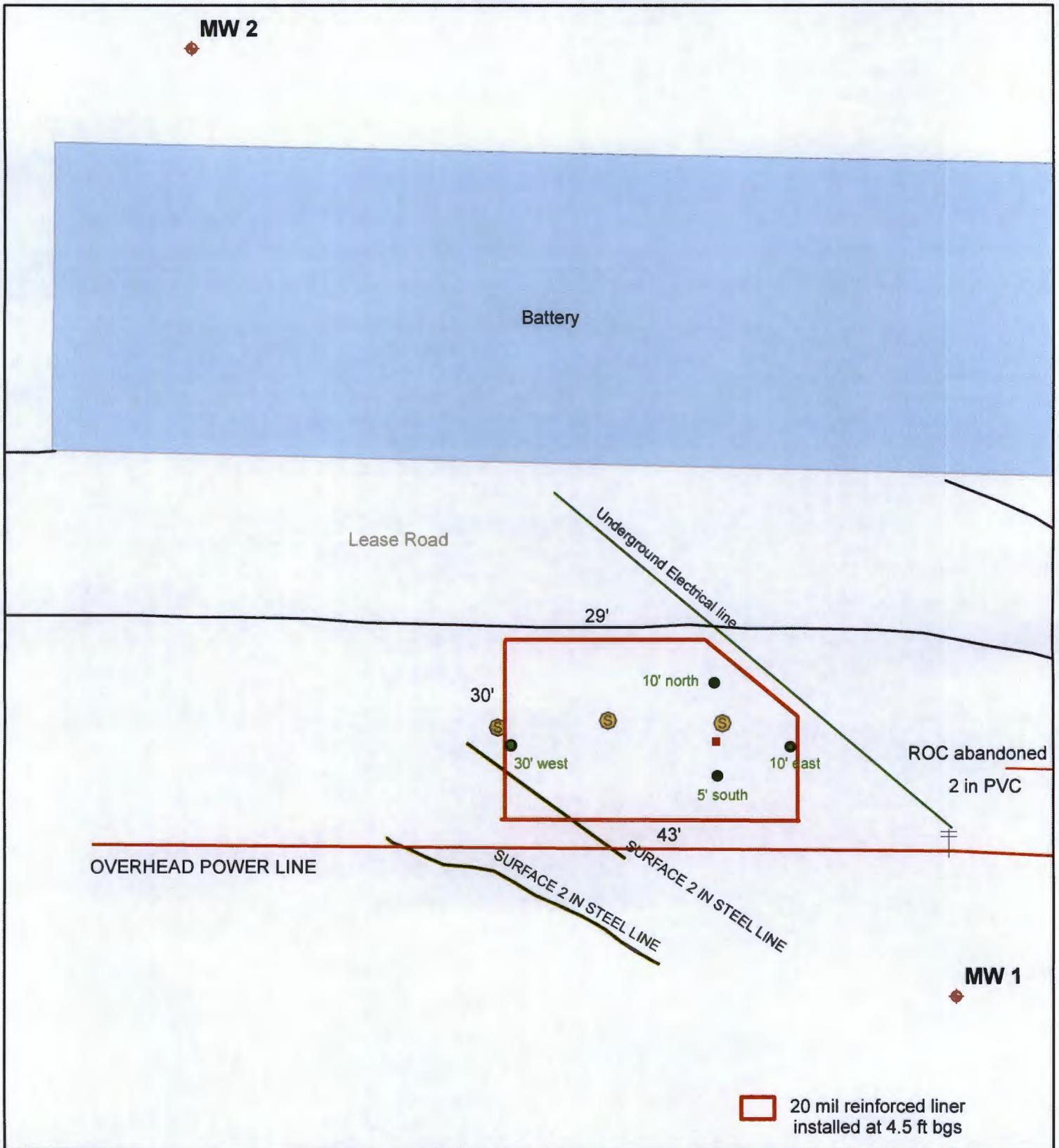
NMOCD Case #: 1R426-214

Figure 1



Drawing date: 8/1/13
Drafted by: L. Weinheimer

NMOCD Approved Liner



GPS Date: 6-25-2013 TG
 Drawing date: 9-5-13
 Drafted by: T. Grieco



BD F-26 vent

Legals: UL/F sec. 26
 T21S R37E
 NMOCD Case #: 1R426-214

APPENDIX A

Record of Groundwater Withdrawal from BD O-23, O-23-1 Recovery Systems

Site Name: BD F-26 vent (1R426-214)

Date	Fluid Hauled (bbls)	Lab Chloride Conc (ppm)	Remarks
5/6/2013			Started pumping
5/9/2013	50		
5/13/2013		10,700	RW-2 (O-23 vent)
5/17/2013	130		
5/20/2013	130		
Total for May		310 bbls	527 kg
	10080	gallons	

Date	Fluid Hauled (bbls)	Lab Chloride Conc (ppm)	Remarks
5/6/2013			
5/9/2013	100		
5/13/2013	130	3900	MW-1R (O-23-1 vent)
5/16/2013	130		
5/24/2013	71		
Total for May		431 bbls	267 kg
	18102	gallons	

Total Chloride Removed 794 kg

May 14, 2013

Hack Conder
Rice Operating Company
112 W. Taylor
Hobbs, NM 88240

RE: BD O-23 VENT

Enclosed are the results of analyses for samples received by the laboratory on 05/13/13 16:06.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

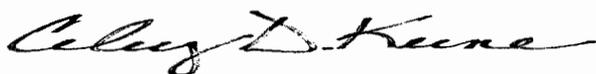
Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Celey D. Keene
Lab Director/Quality Manager

Analytical Results For:

 Rice Operating Company
 Hack Conder
 112 W. Taylor
 Hobbs NM, 88240
 Fax To: (575) 397-1471

Received:	05/13/2013	Sampling Date:	05/13/2013
Reported:	05/14/2013	Sampling Type:	Water
Project Name:	BD O-23 VENT	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	T21S R37E SEC23 O-LEA CTY., NM		

Sample ID: RECOVERY WELL 2 (H301140-01)

Chloride, SM4500Cl-B

mg/L

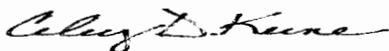
Analyzed By: DW

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride*	10700	4.00	05/14/2013	ND	104	104	100	3.77	

Cardinal Laboratories

*=Accredited Analyte

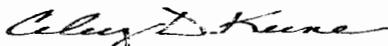
PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report



Celey D. Keene, Lab Director/Quality Manager

May 14, 2013

Hack Conder
Rice Operating Company
112 W. Taylor
Hobbs, NM 88240

RE: BD O-23-1

Enclosed are the results of analyses for samples received by the laboratory on 05/13/13 16:06.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Celey D. Keene
Lab Director/Quality Manager

Analytical Results For:

 Rice Operating Company
 Hack Conder
 112 W. Taylor
 Hobbs NM, 88240
 Fax To: (575) 397-1471

Received:	05/13/2013	Sampling Date:	05/13/2013
Reported:	05/14/2013	Sampling Type:	Water
Project Name:	BD O-23-1	Sampling Condition:	** (See Notes)
Project Number:	NOT GIVEN	Sample Received By:	Jodi Henson
Project Location:	T21S R37E SEC23 O-LEA CTY., NM		

Sample ID: MW 1-R (H301141-01)

Chloride, SM4500Cl-B		mg/L		Analyzed By: DW						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride*	3900	4.00	05/14/2013	ND	104	104	100	3.77		

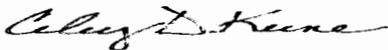
Sample ID: RW-2 (H301141-02)

Chloride, SM4500Cl-B		mg/L		Analyzed By: DW						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride*	4900	4.00	05/14/2013	ND	104	104	100	3.77		

Cardinal Laboratories

* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

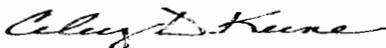
Notes and Definitions

- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- ** Samples not received at proper temperature of 6°C or below.
- *** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



ARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603
(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Rice		BILL TO		ANALYSIS REQUEST																																
Project Manager: Hack Conder		P.O. #:		Chlorides	TPH 8015 M	BTEX	Texas TPH	Complete Cations/Anions	TDS																											
Address:		Company:																																		
City: Hobbs State: NM Zip: 88240		Attn:																																		
Phone #: Fax #:		Address:																																		
Project #: Project Owner:		City:																																		
Project Name:		State: Zip:																																		
Project Location: BOO-23-1		Phone #:																																		
Sampler Name: Kyle Norman		Fax #:																																		
FOR LAB USE ONLY																																				
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS																		MATRIX				PRESERV.			SAMPLING								
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE/COOL	OTHER:	DATE	TIME																						
H30141																																				
1	MW-1R	G	1	✓									5-13-13	11:15	✓																					
2	RW-2	G	1	✓									"	11:25	✓																					

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By: <i>Kyle Norman</i>	Date: 5-13-13	Received By: <i>Jodi Nenson</i>	Phone Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Phone #:
	Time: 4:06		Fax Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Fax #:
Relinquished By:	Date:	Received By:	REMARKS:	
	Time:		email results: zconder@rice-ecs.com Knorman@rice-ecs.com; lpena@riceswd.com Kjones@riceswd.com; Bbaker@rice-ecs.com; hconder@rice-ecs.com; Lweinheimer@rice-ecs.com	
Delivered By: (Circle One)	Sample Condition	Checked By: <i>[Signature]</i>		
Sampler - UPS - Bus - Other:	Cool Intact <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

#54

APPENDIX B

July 18, 2013

KATIE JONES

Rice Operating Company

112 W. Taylor

Hobbs, NM 88240

RE: F-26 VENT (21S/37E) MP

Enclosed are the results of analyses for samples received by the laboratory on 07/15/13 13:20.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

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Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

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This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Mike Snyder

Organic Supervisor

Analytical Results For:

 Rice Operating Company
 KATIE JONES
 112 W. Taylor
 Hobbs NM, 88240
 Fax To: (575) 397-1471

Received:	07/15/2013	Sampling Date:	07/10/2013
Reported:	07/18/2013	Sampling Type:	Soil
Project Name:	F-26 VENT (21S/37E) MP	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: IMPORT SOIL (H301649-01)

Chloride, SM4500Cl-B	mg/kg	Analyzed By: AP							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	07/17/2013	ND	416	104	400	3.92	

Cardinal Laboratories

*=Accredited Analyte

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Mike Snyder, Organic Supervisor

Notes and Definitions

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RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report



Mike Snyder, Organic Supervisor



PO Box 5630
 Hobbs, NM 88241
 Phone: (575) 393-4411
 Fax: (575) 393-0293

REVEGETATION FORM

1. General Information

Site name: BD F-26 vent						
U/L F	Section 26	Township 21S	Range 37E	County Lea	Latitude 32*27.173' N	Longitude 103*08.243' W
Contact Name: Hack Conder						
Email: hconder@riceswd.com						
Site size: 2500 square feet			Map detail of site attached <input type="checkbox"/>			
Additional information:						

2. Soils

**Do not rip caliche subsoils: caliche rocks brought to the surface by ripping shall be removed.*

Salvaged from site <input type="checkbox"/>	Bioremediated <input type="checkbox"/>	Imported <input checked="" type="checkbox"/>	Blended <input type="checkbox"/>	Depth (in):
Texture: Sand	Describe soil & subsoil: Blowsand			
Soil prep methods: Rip <input type="checkbox"/>	Depth(in):	Disc <input checked="" type="checkbox"/>	Depth (in): 3 in	Rollerpack <input type="checkbox"/>
Date completed: 7 / 11 / 2013				

3. Bioremediation

Fertilizer <input type="checkbox"/>	Hay <input type="checkbox"/>	Other <input checked="" type="checkbox"/>
Type:		Describe: 1 bag of manure. 10 bags of potting soil. 5 bags of Restor Nhance
Lbs/acre:		

4. Seeding

**Attach seed bag tags to this form. Seed bag tags shall contain the site name and S-T-R.*

Custom seed mix <input checked="" type="checkbox"/>	Prescribed mix <input type="checkbox"/>	Seed mix name: 10 lbs. Race horse oats, 5 lbs. Blue grama, 5 lbs. side oats.	Seeding date: 7/12/2013
Broadcast <input type="checkbox"/>			
Method: Used mechanical seeder			
Soil conditions during seeding: Dry <input checked="" type="checkbox"/> Damp <input type="checkbox"/> Wet <input type="checkbox"/>			
Photos attached <input type="checkbox"/>	Observations: Seed was tilled into the soil		
Number of photos:			

5. Certification

I hereby certify that the information in this form and attachments is true and complete to the best of my knowledge and belief.

Name: Zach Conder	Title: Environmental Tech	Date: 8-15-13
Signature:		

BD F-26 vent (1R426-214)
Unit Letter F, Section 26, T21S, R37E



Site prior to excavation,
facing north 6/17/2013



Excavating,
Facing southeast 7/2/2013



Exporting soil,
facing west 7/2/2013



Excavation final,
facing northwest 7/9/2013



Installing 6" bottom sand pad,
facing northeast 7/9/2013



Installing liner,
Facing south 7/9/2013

BD F-26 vent (1R426-214)
Unit Letter F, Section 26, T21S, R37E



Padding liner with blowsand,
Facing northwest 7/9/2013



Backfilling excavation,
Facing south 7/10/2013



Final complete,
facing east 7/11/2013



Spreading seed,
facing northwest 7/12/2013



Tilling seed,
facing northwest 7/12/2013



Site complete with vegetation,
facing north 8/9/2013