

February 2, 2006

NMOCD District 2 Office  
Oil Conservation Division  
Chris Beadle  
1301 West Grand  
Artesia, New Mexico 88210

RE: Letter of Violation for Range Operating New Mexico, Inc. Inspection  
#iCLB0534948599, South Culebra Bluff (SCB) 23 No. 004

**Chronology**

On December 16, 2005 a letter of violation was issued to Range Operating New Mexico, Inc. (Range) for violations identified during a random / periodic inspection on December 15, 2005. The letter was received by the Range office on December 27, 2005. White Buffalo Environmental Services, Inc (WBESI) was notified via fax of this violation on December 27, 2005. Greg Swindle of WBESI contacted Rudy Garcia field foreman for Range -Loving office to discuss response actions. Upon notification from NMOCD Mr. Garcia responded to the location by contacting a work crew to begin excavation unaware that a work plan needed to be filed and approved prior to initiating work on this site. Mr. Swindle went to the field and reviewed activities in the field on January 5, 2006.

Excavation of the entire area inside the secondary containment of this location had begun and was almost completed. The site was assessed for a formal work plan and specific site information obtained. WBESI uses the attached information and metrics sheet for summarizing the remediation requirements for each site.

On January 11, 2006, Greg Swindle of WBESI met with Chris Beadle of NMOCD for the purposes of sampling the site to determine if remediation was complete. The lab results were obtained from the analyses provided by ASK Laboratories of Amarillo, Texas, and compared to the remediation action levels based upon the site score and ranking. The results indicated that the North Wall and the East wall of the area are below action levels and remediation may cease in these areas. The West Wall sample was only slightly above the TPH action limits and only slight enlargement will be required in this area. The South and Floor area require significantly more activity.

The following is an updated "Remediation Work Plan" for each site:

**South Culebra Bluff (SCB) 23 No.004**

**General site characteristics**

**Depth to Ground Water: 92'**

**Wellhead Protection Area: 646' to closest well**

**Distance to Nearest Surface Water Body: 1.4 miles**

**Site ranking score 30**

**Soil remediation action levels**

Highly Contaminated / Saturated Soils

Benzene 10 ppm, BTEX 50ppm, TPH 100 ppm

**Soil remediation methods**

Excavation and disposal (or alternative approved onsite remediation)

**Planned analytical testing**

BTEX, TPH, Chlorides on soil

**Work Plan**

- Continue excavation in the Westerly direction by one foot.
- Remove all tanks from the location as this site will not be returned to battery usage.
- Excavate the tank area to the depth of the original excavation.
- Excavate the Southern ½ of the area a minimum of 2 more feet.
- Excavate further in a Southerly direction a minimum of 4 feet. (This may require the relocation of the current spoils pile.)
- The site will then be evaluated for further sampling.
- Sample site for above parameters.
- Determine quantity of spoils removed from the excavated area.
- Determine most cost effective means of disposal or onsite bioremediation in accordance with NMOCD "Guidelines for Remediation of Leaks, Spills, and Releases".
- Contact NMOCD to set up sampling and post remediation inspection for February 17, 2006.
- Review analytical results.
- Backfill excavation if limits have been achieved or continue excavation.
- Sampling will be per NMOCD guidance including all walls and floor of the excavation.
- A final report will be issued on behalf of Range to the NMOCD documenting all final activities.
- A final letter of concurrence and closure will be issued by NMOCD if all guidelines have been achieved.

Please see site drawing for additional details.

For further questions or comments please contact White Buffalo Environmental Services, Inc. at (325) 651-9054.



Greg Swindle,  
President  
WBESI

Enclosures:

Site drawing

Site Photographs

Laboratory Report

# ASK Laboratories, Inc.

Analytical Services Kwik!

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

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

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

Attn: GREG SWINDLE

Purchase Order: RANGE OPERATING N.M.  
Invoice Number: SCB-23-4

Verification


Order #: 06-01-040  
Date: 01/23/06 08:43  
Work ID: SOIL SAMPLES  
Date Received: 01/16/06  
Date Completed: 01/20/06

Client Code: WHITE\_BUFF

## SAMPLE IDENTIFICATION

<u>Sample Number</u>	<u>Sample Description</u>
01	SPOILS
02	SOUTH
03	EAST
04	NORTH

<u>Sample Number</u>	<u>Sample Description</u>
05	WEST
06	COMP FLOOR
07	SCB 23'6 FLOOR AFTER REMD

  
\_\_\_\_\_  
Certified By  
Alan D. King

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

# ASK Laboratories, Inc.

## Analytical Services Kwik!

Order # 06-01-040  
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### TEST RESULTS BY SAMPLE

Sample: 01A SPOILS

Collected: 01/11/06 10:40

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	97.80		wt % solids	01/16/06	BJP
CHLORIDE	2310	100	mg/kg	01/17/06	BNH
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	263	63.1	mg/kg	01/18/06	BNH
TPH C12-C28 - DRO	7570	63.1	mg/kg	01/18/06	BNH
TPH C28-C35	1690	63.1	mg/kg	01/18/06	BNH
BTEX					
BENZENE	<0.020	0.020	mg/kg	01/16/06	KDJ
TOLUENE	<0.020	0.020	mg/kg	01/16/06	KDJ
ETHYLBENZENE	<0.020	0.020	mg/kg	01/16/06	KDJ
XYLENE	<0.020	0.020	mg/kg	01/16/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	117	Min: 80		Max: 120	

Sample: 02A SOUTH

Collected: 01/11/06 10:42

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	98.90		wt % solids	01/16/06	BJP
CHLORIDE ON SOLIDS	1890	50	mg/kg	01/17/06	BNH
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	<60.5	60.5	mg/kg	01/18/06	BNH
TPH C12-C28 - DRO	3600	60.5	mg/kg	01/18/06	BNH
TPH C28-C35	1070	60.5	mg/kg	01/18/06	BNH
BTEX					
BENZENE	<0.020	0.020	mg/kg	01/16/06	KDJ
TOLUENE	<0.020	0.020	mg/kg	01/16/06	KDJ
ETHYLBENZENE	<0.020	0.020	mg/kg	01/16/06	KDJ
XYLENE	<0.020	0.020	mg/kg	01/16/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	118	Min: 80		Max: 120	

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### TEST RESULTS BY SAMPLE

Sample: 03A EAST

Collected: 01/11/06 10:44

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	92.12		wt % solids	01/16/06	BJP
CHLORIDE ON SOLIDS	1840	50	mg/kg	01/17/06	BNH
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	<33.6	33.6	mg/kg	01/18/06	BNH
TPH C12-C28 - DRO	<33.6	33.6	mg/kg	01/18/06	BNH
TPH C28-C35	<33.6	33.6	mg/kg	01/18/06	BNH
BTEX					
BENZENE	<0.022	0.022	mg/kg	01/16/06	KDJ
TOLUENE	<0.022	0.022	mg/kg	01/16/06	KDJ
ETHYLBENZENE	<0.022	0.022	mg/kg	01/16/06	KDJ
XYLENE	<0.022	0.022	mg/kg	01/16/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	105	Min: 80		Max: 120	

Sample: 04A NORTH

Collected: 01/11/06 10:46

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	96.50		wt % solids	01/16/06	BJP
CHLORIDE ON SOLIDS	134	10	mg/kg	01/17/06	BNH
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	<31.7	31.7	mg/kg	01/18/06	BNH
TPH C12-C28 - DRO	<31.7	31.7	mg/kg	01/18/06	BNH
TPH C28-C35	<31.7	31.7	mg/kg	01/18/06	BNH
BTEX					
BENZENE	<0.021	0.021	mg/kg	01/16/06	KDJ
TOLUENE	<0.021	0.021	mg/kg	01/16/06	KDJ
ETHYLBENZENE	<0.021	0.021	mg/kg	01/16/06	KDJ
XYLENE	<0.021	0.021	mg/kg	01/16/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	110	Min: 80		Max: 120	

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### TEST RESULTS BY SAMPLE

Sample: 05A WEST

Collected: 01/11/06 10:48

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	98.23		wt % solids	01/16/06	BJP
CHLORIDE ON SOLIDS	534	10	mg/kg	01/17/06	BNH
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	<33.7	33.7	mg/kg	01/18/06	BNH
TPH C12-C28 - DRO	145	33.7	mg/kg	01/18/06	BNH
TPH C28-C35	<33.7	33.7	mg/kg	01/18/06	BNH
BTEX					
BENZENE -	<0.020	0.020	mg/kg	01/16/06	KDJ
TOLUENE	<0.020	0.020	mg/kg	01/16/06	KDJ
ETHYLBENZENE	<0.020	0.020	mg/kg	01/16/06	KDJ
XYLENE	<0.020	0.020	mg/kg	01/16/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	106	Min: 80	Max: 120		

Sample: 06A COMP FLOOR

Collected: 01/11/06 10:52

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	90.97		wt % solids	01/16/06	BJP
CHLORIDE ON SOLIDS	1430	50	mg/kg	01/17/06	BNH
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	87.7	42.6	mg/kg	01/18/06	BNH
TPH C12-C28 - DRO	2940	42.6	mg/kg	01/18/06	BNH
TPH C28-C35	656	42.6	mg/kg	01/18/06	BNH
BTEX					
BENZENE	<0.022	0.022	mg/kg	01/16/06	KDJ
TOLUENE	<0.022	0.022	mg/kg	01/16/06	KDJ
ETHYLBENZENE	<0.022	0.022	mg/kg	01/16/06	KDJ
XYLENE	<0.022	0.022	mg/kg	01/16/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	108	Min: 80	Max: 120		

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### TEST RESULTS BY SAMPLE

Sample: 07A SCB 23'6 FLOOR AFTER REMD Collected: 01/11/06 12:01

<u>Test Description</u>	<u>Result</u>	<u>SOL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	93.69		wt % solids	01/16/06	BJP
CHLORIDE ON SOLIDS	190	10	mg/kg	01/17/06	BNH
Total Petroleum Hydrocarbons					
TPH C6-C12 - GRO	5080	347	mg/kg	01/18/06	BNH
TPH C12-C28 - DRO	40700	347	mg/kg	01/18/06	BNH
TPH C28-C35	6570	347	mg/kg	01/18/06	BNH
BTEX					
BENZENE	<0.025	0.025	mg/kg	01/16/06	KDJ
TOLUENE	0.282	0.025	mg/kg	01/16/06	KDJ
ETHYLBENZENE	0.550	0.025	mg/kg	01/16/06	KDJ
XYLENE	3.10	0.025	mg/kg	01/16/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	110	Min: 80	Max: 120		

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### QA/QC INFORMATION

	LCS	MS	MSD	RPD	BLANK
BENZENE	97%	89%	82%	7.5%	bd1
TOLUENE	102%	81%	89%	10.1%	bd1
ETHYLBENZENE	102%	86%	94%	8.0%	bd1
O-XYLENE	102%	88%	95%	8.2%	bd1
m,p-XYLENES	103%	87%	97%	10.9%	bd1

	LCS	MS	MSD	RPD	BLANK
TX1005 TPH	97%	87%	89%	1.9%	bd1

	RPD	SPIKE RECOVERY	QC RECOVERY	BLANK
CHLORIDE	0.9%	100%	104%	bd1

bd1 = below detectable levels

### TEST METHODOLOGIES

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

REFERENCE CLP PROTOCOL/ SECTION IV/ PART F

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

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

TEST CODE : BTEX      TEST NAME : BTEX

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

TEST CODE : CL\_SOL      TEST NAME : CHLORIDE ON SOLID

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

METHOD 9056 ION CHROMATOGRAPHY  
SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.

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# ASK Laboratories

Analytical Services Kwik!

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# Chain of Custody Record

Work Order No.

Client Name White Buffalo Environmental  
- Project I.D./Location Range Operating New Mexico  
Address 5425 Ben Franklin Rd. San Angelo, TX 76901  
Telephone (325) 651-9054  
Sampled By Greg Swindle

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

Sample #	Date	Time	Matrix	Composite	Grab	Sample Description	No. of Containers	Analysis Required	Remarks
01	1/11/06	10:40	Soil	X	X	Spoils	1	X X X	
02		10:42		X	X	South	1	X X X	
03		10:44		X	X	East	1	X X X	
04		10:46		X	X	North	1	X X X	
05		10:48		X	X	West	1	X X X	
06		10:52		X	X	Comp Floor	1	X X X	
07		12:01	↓	X	X	SCB 23' 6 Floor After "Remd"	1	X X X	
08									
09									
10									

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
<i>[Signature]</i>	1/11/06	10:40	<i>[Signature]</i>	1/13/06	16:30
<i>[Signature]</i>	1/13/06	16:30	<i>[Signature]</i>	1/14/06	9:30

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

Remarks:	Headspace Property Sealed Chilled to 40° F Tamper Seal Type of Container Additional Comments:
----------	--------------------------------------------------------------------------------------------------------------

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

CLASS w/ TEFLO-1

# Login Checklist

Order # 0601040

Shipping Method: Bus

Date/Time of Receipt: 1/14/06 0930

## Cooler Check

Shipping Container	Ice in Cooler			Custody Seal				Tracking Number
			If No,	Present?		Intact?		
	Yes	No	Temperature	Yes	No	Yes	No	
COOLER	X				X			822745

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

## Custody Seals on Bottles Present:

Yes \_\_\_\_\_ No X

If Yes, is it intact?

Yes \_\_\_\_\_ No \_\_\_\_\_

If Not intact, fill out NCR

## Condition of Containers:

Loose Caps:

Yes \_\_\_\_\_ No X

If Yes, fill out NCR

Broken Containers:

Yes \_\_\_\_\_ No X

If Yes, fill out NCR

## Chain of Custody Included:

Yes X No \_\_\_\_\_

If Yes, verify receipt of all containers listed and all required fields are complete. Sign and Date COC and fill out laboratory boxes. Document any discrepancies on NCR.

## Acid Preserved Samples: pH<=2

Yes \_\_\_\_\_ No \_\_\_\_\_

If No, fill out NCR

## Base Preserved Samples: pH>=12

Yes \_\_\_\_\_ No \_\_\_\_\_

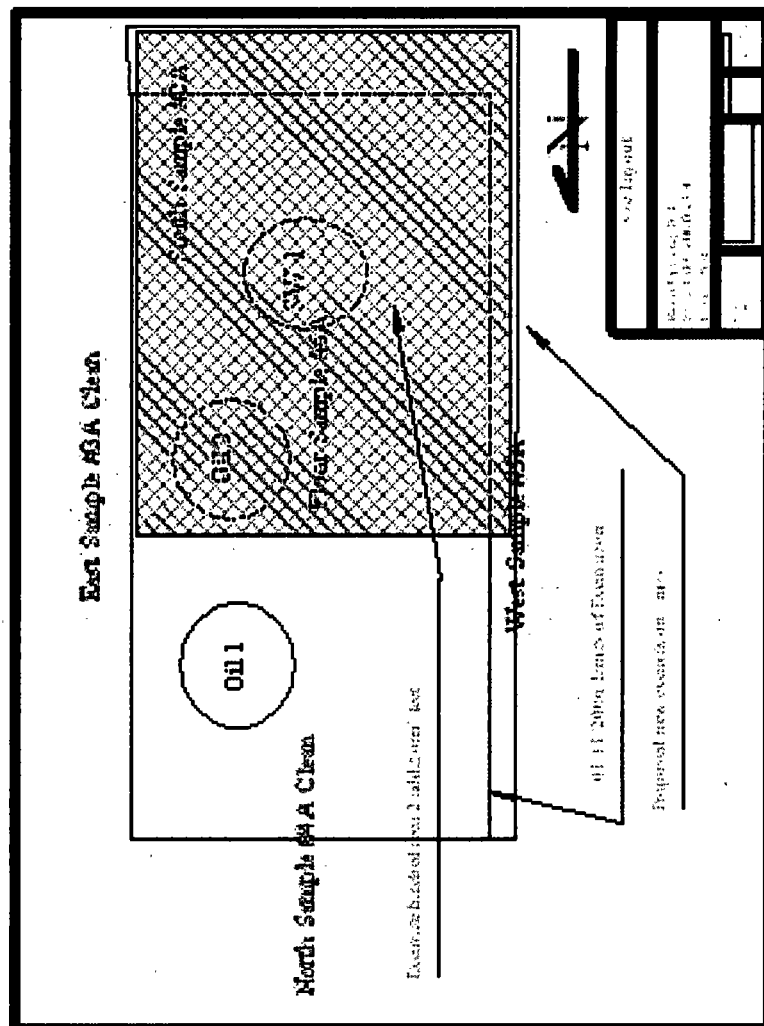
If No, fill out NCR

Coolers Unpacked/Checked by: Tue

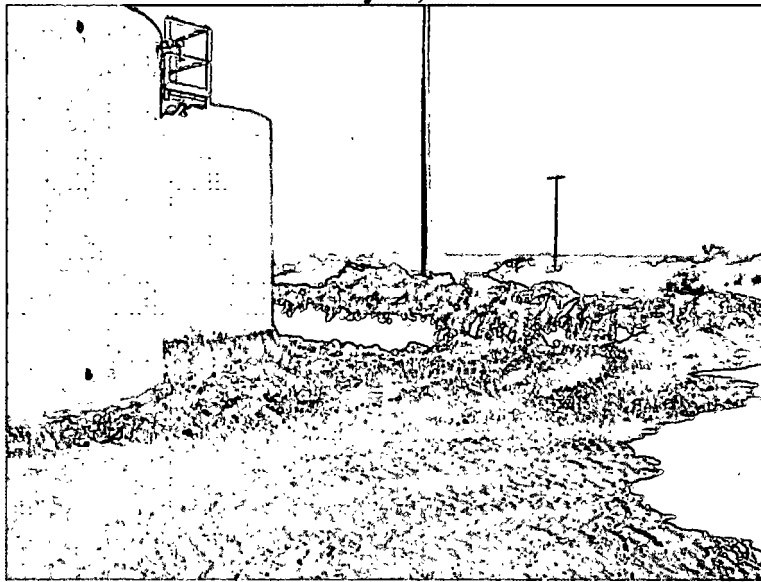
Date: 1/14/06

NCRs (y/n): N

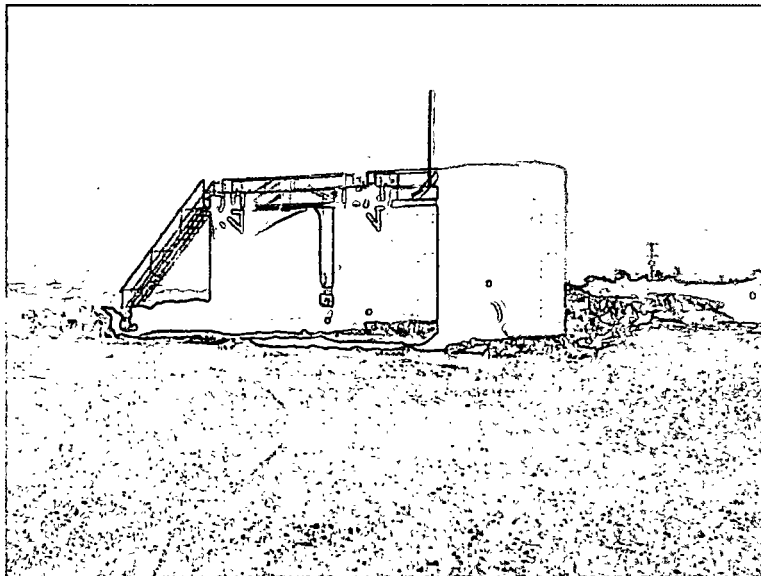
Faxed Confirmation (y/n): \_\_\_\_\_



Site Photographs  
Range NM SCB 23-4 remediation site  
January 11, 2006

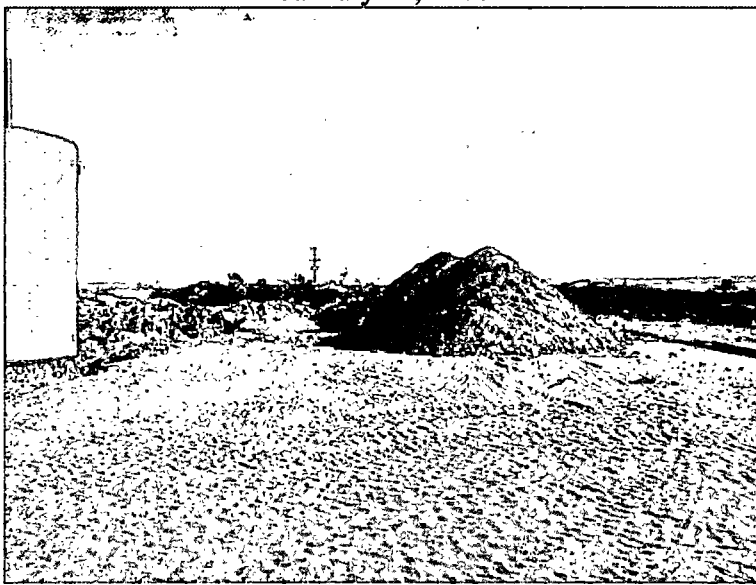


Southeast corner of remediation area



Front view of site

Site Photographs  
Range NM SCB 23-4 remediation site  
January 11, 2006



South area with spoils