

April 10, 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. Mr. Swindle went to the field and reviewed activities in the field on January 5, 2006. The site was assessed for a formal work plan and specific site information obtained.

On March 29, 2006 after receiving notice from Tony Tucker, Range Resources Production Foreman Loving New Mexico Area., of completion of excavation and remediation; Ronnie Taylor of White Buffalo Environmental Services Inc arrived on site to perform final sampling. Samples were collected from the floor area, South wall, and West wall of the spill site. These samples were immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The samples were analyzed for BTEX, TPH (NM 8015N), and Chloride content.

On April 10, 2006 the sample results were received from the laboratory. The results revealed that the BTEX, and TPH concentrations were above remediation limits. Further excavation will be performed and a future sampling date will be coordinated with you.

Please review the attached results and notify me via letter or email if you have any questions.

Sincerely,



Greg Swindle,  
President  
WBESI

Enclosures:

Laboratory results

# ASK Laboratories, Inc.

Analytical Services Kwik!

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

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

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

Attn: GREG SWINDLE

Order #: 06-03-132  
Date: 04/06/06 09:46  
Work ID: SOIL SAMPLES  
Date Received: 03/31/06  
Date Completed: 04/06/06


Purchase Order: ~~06-03-132~~ #4  
Invoice Number:

Client Code: WHITE\_BUFF

## SAMPLE IDENTIFICATION

<u>Sample Number</u>	<u>Sample Description</u>
01	SOUTH WALL
02	WEST WALL

<u>Sample Number</u>	<u>Sample Description</u>
03	FLOOR

  
\_\_\_\_\_  
Certified By  
ALAN D. KING

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

# ASK Laboratories, Inc.

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Order # 06-03-132

04/06/06 09:46

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## TEST RESULTS BY SAMPLE

Sample: 01A SOUTH WALL

Collected: 03/29/06 09:00

Test Description	Result	SQL	Units	Analyzed	By
PERCENT SOLIDS - DRY WT.	89.55		wt % solids	03/31/06	BJP
CHLORIDE ON SOLIDS	1110	100	mg/kg	03/31/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<81.8	81.8	mg/kg	04/05/06	BNH
TPH C12-C28 - DRO	1050	81.8	mg/kg	04/05/06	BNH
TPH C28-C35	143	81.8	mg/kg	04/05/06	BNH
BTEX					
BENZENE	<0.022	0.022	mg/kg	04/03/06	KDJ
TOLUENE	<0.022	0.022	mg/kg	04/03/06	KDJ
ETHYLBENZENE	<0.022	0.022	mg/kg	04/03/06	KDJ
XYLENE	<0.022	0.022	mg/kg	04/03/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	107	Min: 80	Max: 120		

Sample: 02A WEST WALL

Collected: 03/29/06 09:00

Test Description	Result	SQL	Units	Analyzed	By
PERCENT SOLIDS - DRY WT.	89.53		wt % solids	03/31/06	BJP
CHLORIDE ON SOLIDS	2040	100	mg/kg	03/31/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<36.7	36.7	mg/kg	04/05/06	BNH
TPH C12-C28 - DRO	553	36.7	mg/kg	04/05/06	BNH
TPH C28-C35	57.3	36.7	mg/kg	04/05/06	BNH
BTEX					
BENZENE	<0.025	0.025	mg/kg	04/03/06	KDJ
TOLUENE	<0.025	0.025	mg/kg	04/03/06	KDJ
ETHYLBENZENE	<0.025	0.025	mg/kg	04/03/06	KDJ
XYLENE	<0.025	0.025	mg/kg	04/03/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	108	Min: 80	Max: 120		

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04/06/06 09:46

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## TEST RESULTS BY SAMPLE

Sample: 03A FLOOR

Collected: 03/29/06 09:00

Test Description	Result	SOL	Units	Analyzed	By
PERCENT SOLIDS - DRY WT.	89.80		wt % solids	03/31/06	BJP
CHLORIDE ON SOLIDS	1290	100	mg/kg	03/31/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<168	168	mg/kg	04/05/06	BNH
TPH C12-C28 - DRO	3370	168	mg/kg	04/05/06	BNH
TPH C28-C35	182	168	mg/kg	04/05/06	BNH
BTEX					
BENZENE	<0.022	0.022	mg/kg	04/03/06	KDJ
TOLUENE	<0.022	0.022	mg/kg	04/03/06	KDJ
ETHYLBENZENE	<0.022	0.022	mg/kg	04/03/06	KDJ
XYLENE	<0.022	0.022	mg/kg	04/03/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	113	Min: 80	Max: 120		

## QA/QC INFORMATION

	LCS	MS	MSD	RPD	BLANK
MTBE	100%	107%	106%	0.4%	bdl
BENZENE	99%	95%	93%	1.6%	bdl
TOLUENE	96%	90%	91%	1.1%	bdl
ETHYLBENZENE	99%	95%	96%	1.0%	bdl
o-XYLENE	100%	93%	94%	0.8%	bdl
m,p-XYLENES	100%	97%	97%	0.0%	bdl
METHOD 8015	LCS	MS	MSD	RPD	BLANK
TPH	95%	94%	92%	2.3%	bdl
COMPOUND	RPD	SPIKE RECOVERY	QC RECOVERY	BLANK	
CHLORIDE	0.9%	91%	94%	bdl	

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bdl = below detectable levels

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## TEST METHODOLOGIES

TEST CODE : SOLIDS

TEST NAME : PERCENT SOLIDS FOR DRY WT CORRECTIONS

REFERENCE CLP PROTOCOL/ SECTION IV/ PART F

TEST CODE : 8015N

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

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

TEST CODE : BTEX

TEST NAME : BTEX

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

TEST CODE : CL\_SOL

TEST NAME : CHLORIDE ON SOLID

METHOD 300.0 : ION CHROMATOGRAPHY  
METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES,

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

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# ASK Laboratories

Analytical Services Kwiki

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

# Chain of Custody Record

Work Order No.

Client Name White Buffalo Environmental

Project I.D./Location Range Operating SCB23#4

Address 5425 Ben Ficklin Rd. San Angelo, TX 76904

Telephone (325) 651-9054

Sampled By Ronnie Taylor

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

Sample #	Date	Time	Matrix	Composite	Grab	Sample Description	No. of Containers	Analysis Required	Remarks
01	3/29/06	9:00A	soil	X	X	South Wall	1	X X X	glass
02	↓	↓	↓	X	X	West Wall	1	X X X	↓
03	↓	↓	↓	X	X	Floor	1	X X X	↓
04									
05									
06									
07									
08									
09									
10									

Relinquished By: (Signature)	Date	Time	Received By: (Signature)
<i>[Signature]</i>	3/30/06	8:00A	<i>[Signature]</i>
Relinquished By: (Signature)	Date	Time	Received By: (Signature)
<i>[Signature]</i>	3/30/06	16:30 P	BUS
Relinquished By: (Signature)	Date	Time	Received By: (Signature)
BUS	3-31	0700	<i>[Signature]</i>

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

Remarks:	Headspace	Yes	No	If Yes, Amt.
	Properly Sealed	✓		If No, Explain
	Chilled to 40° F	✓		If No, Temp.
	Tamper Seal		✓	Comments
Type of Container				
Additional Comments:				

**White Buffalo Environmental Services, Inc.**

**5425 Ben Flicklin Road San Angelo, Texas 76904**

**Phone: 325-651-9054 Fax: 325-651-2125**

Client (Name): Range						Project (Name): South Culebra Bluff 23 #4								
Address:						Location: Loving, NM								
City, State, Zip:														
Telephone:														
Fax:														
W.B.E.S. Lab No.	Date	Time	Comp.	Grab.	Sample Description	No. of Samples	Type of Container	BTEX	TRPH N/M	TCLP	RCRA Metals	TDS	PAH	CHLORIDES
06-	3/29	9:00	X		South wall	1	glass	X	X					X
06-	↓	↓	X		West wall	1	J	X	X					X
06-	↓	↓		X	Floor	1	↓	X	X					X
06-														
06-														
06-														
06-														
06-														
06-														
06-														
06-														
06-														
Sampled By: Signature... [Signature]	Date: 3/29/06	Time: 9:00A	Witnessed By: Signature... [Signature]							Date: 3/29/06	Time: 9:00A			
Relinquished By: Signature... [Signature]	Date: 3/30/06	Time: 8:00A	Received By: Signature... [Signature]							Date: 3/30/06	Time: 8:00A			
Relinquished By: Signature... [Signature]	Date: 3/30/06	Time: [Blank]	Received for Laboratory By: Signature... [Signature]							Date: 3/30/06	Time: [Blank]			

Site Photographs  
SCB 23-4  
3-29-2006

