

May 5, 2006

NMOCD District 2 Office  
Oil Conservation Division  
Mike Bratcher  
1301 West Grand  
Artesia, New Mexico 88210

RE: Letter of Violation for Range Operating New Mexico, Inc. Inspection, South Culebra Bluff (SCB) Unit No. 003

**Chronology**

On January 11, 2006 during a random inspection of Range Operating New Mexico, Inc. (Range) site South Culebra Bluff (SCB) Unit No 003 it was observed that the site had a spill of approximately two barrels. Greg Swindle of WBESI was being accompanied on the inspection by Chris Beadle of the NMOCD. Mr. Swindle contacted Rudy Garcia field foreman for Range –Loving office to discuss the situation. Mr. Garcia had asked a contract crew to clean out the cellar and assumed they would pump out the site. However, the crew cleaned the cellar with buckets and dumped the waste on the ground. The site was assessed for a formal work plan and specific site information obtained. 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. A sample was collected from the floor area of the spill site. The sample was immediately placed on ice for transportation and shipment to ASK Laboratories in Amarillo, Texas. The sample was 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.

On April 13, 2006, Ronnie Taylor with WBESI performed additional sampling. The 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.

One April 19, 2006 the sample results were received from the laboratory. The results again 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,

A handwritten signature in black ink, appearing to read 'Greg Swindle', written in a cursive style.

Greg Swindle,  
President  
WBESI

Enclosures:

Laboratory results  
Photographs

# 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 #: 06-04-037  
Date: 04/19/06 14:30  
Work ID: SCB 23 #3B S1-S3  
Date Received: 04/14/06  
Date Completed: 04/19/06

Purchase Order: RANGE OPERATING, LOVING NM  
Invoice Number:

Client Code: WHITE\_BUFF

## SAMPLE IDENTIFICATION

<u>Sample Number</u>	<u>Sample Description</u>
01	SCB 23 #3B S1
02	SCB 23 #3B S2

<u>Sample Number</u>	<u>Sample Description</u>
03	SCB 23 #3B S3

  
\_\_\_\_\_  
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 # 06-04-037  
04/19/06 14:30

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TEST RESULTS BY SAMPLE

Sample: 01A SCB 23 #3B S1

Collected: 04/13/06 09:15

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	94.84		wt % solids	04/17/06	BJP
CHLORIDE ON SOLIDS	4390	100	mg/kg	04/18/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<33.5	33.5	mg/kg	04/18/06	BNH
TPH C12-C28 - DRO	2580	33.5	mg/kg	04/18/06	BNH
TPH C28-C35	629	33.5	mg/kg	04/18/06	BNH
BTEX					
BENZENE	<0.021	0.021	mg/kg	04/17/06	KDJ
TOLUENE	<0.021	0.021	mg/kg	04/17/06	KDJ
ETHYLBENZENE	<0.021	0.021	mg/kg	04/17/06	KDJ
XYLENE	0.046	0.021	mg/kg	04/17/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	99	Min: 80		Max: 120	

Sample: 02A SCB 23 #3B S2

Collected: 04/13/06 09:15

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	97.99		wt % solids	04/17/06	BJP
CHLORIDE ON SOLIDS	7360	100	mg/kg	04/18/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<32.7	32.7	mg/kg	04/18/06	BNH
TPH C12-C28 - DRO	999	32.7	mg/kg	04/18/06	BNH
TPH C28-C35	240	32.7	mg/kg	04/18/06	BNH
BTEX					
BENZENE	<0.018	0.018	mg/kg	04/17/06	KDJ
TOLUENE	<0.018	0.018	mg/kg	04/17/06	KDJ
ETHYLBENZENE	<0.018	0.018	mg/kg	04/17/06	KDJ
XYLENE	<0.018	0.018	mg/kg	04/17/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	102	Min: 80		Max: 120	

# ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-04-037  
04/19/06 14:30

ASK LABORATORIES, INC.

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TEST RESULTS BY SAMPLE

Sample: 03A SCB 23 #3B S3

Collected: 04/13/06 09:15

Test Description	Result	SQL	Units	Analyzed	By
PERCENT SOLIDS - DRY WT.	97.84		wt % solids	04/17/06	BJP
CHLORIDE ON SOLIDS	10800	100	mg/kg	04/18/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<32.4	32.4	mg/kg	04/18/06	BNH
TPH C12-C28 - DRO	667	32.4	mg/kg	04/18/06	BNH
TPH C28-C35	146	32.4	mg/kg	04/18/06	BNH
BTEX					
BENZENE	<0.020	0.020	mg/kg	04/17/06	KDJ
TOLUENE	<0.020	0.020	mg/kg	04/17/06	KDJ
ETHYLBENZENE	<0.020	0.020	mg/kg	04/17/06	KDJ
XYLENE	<0.020	0.020	mg/kg	04/17/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	101	Min: 80		Max: 120	

QA/QC INFORMATION

	LCS	MS	MSD	RPD	BLANK
MTBE	91%	93%	103%	10.7%	bdl
BENZENE	97%	93%	93%	0.3%	bdl
TOLUENE	89%	86%	85%	1.5%	bdl
ETHYLBENZENE	92%	89%	89%	0.9%	bdl
o-XYLENE	93%	88%	88%	0.8%	bdl
m, p-XYLENES	89%	91%	90%	1.2%	bdl
METHOD 8015					
TPH	98%	79%	76%	1.8%	bdl
COMPOUND					
CHLORIDE	RPD	SPIKE RECOVERY	QC RECOVERY	BLANK	
	0.3%	91%	95%	bdl	

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

bdl = below detectable levels

# ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-04-037  
04/19/06 14:30

ASK LABORATORIES, INC.

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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

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 Telephone: (806) 353-4425  
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# Chain of Custody Record

Work Order No. \_\_\_\_\_  
 Client Name White Buffalo Environmental  
 Project I.D./Location Revere Over Mine Levee NM  
 Address 5425 Ben Ficklin Rd. San Angelo, TX 76901  
 Telephone (325) 651-9054  
 Sampled By Ronnie Taylor

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 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
								Analysis Required	Analysis Required	
01	4-13-06	9:15a	Soil		X	SCB 23 #3B S1	1	X	X	glass
02			↓		X	SCB 23 #3B S2	1	X	X	↓
03			↓		X	SCB 23 #3B S3	1	X	X	
04										
05										
06										
07										
08										
09										
10										

Relinquished by: (signature) <u>Ronnie Taylor</u>	Date 4-13-06	Time 10:30p	Received by: (signature) <u>BUS</u>
Relinquished by: (signature) <u>BUS</u>	Date 4-14-06	Time 0705	Received by: (signature) <u>ADA</u>
Relinquished by: (signature)	Date	Time	Received by: (signature)

Client Agrees to:	Remarks:
Accept Returned Sample	Headspace
Pay for sample Disposal (\$30 per 100 grams)	Property Sealed
Client's Signature _____	Chilled to 40° F
	Tamper Seal
	Type of Container
	Additional Comments:

Yes	No	If Yes, Amt.	If No, Explain
<input checked="" type="checkbox"/>	<input type="checkbox"/>	1/2"	
<input checked="" type="checkbox"/>	<input type="checkbox"/>		
<input checked="" type="checkbox"/>	<input type="checkbox"/>		IC No. Temp. <u>61.5 T 22.1</u>
<input type="checkbox"/>	<input checked="" type="checkbox"/>		Comments

**Login Checklist**

Order # 0604037

Shipping Method: Bus

Date/Time of Receipt: 4-14 0705

**Cooler Check**

Shipping Container	Ice in Cooler			Custody Seal				Tracking Number
			If No,	Present?		Intact?		
	Yes	No	Temperature	Yes	No	Yes	No	
<u>Cover</u>	<u>X</u>				<u>X</u>			

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 N/A  
 If No, fill out NCR

**Base Preserved Samples: pH ≥ 12** Yes \_\_\_\_\_ No \_\_\_\_\_ Solid  
 If No, fill out NCR

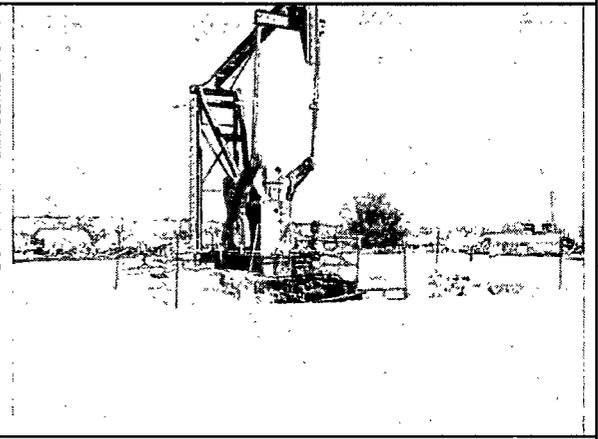
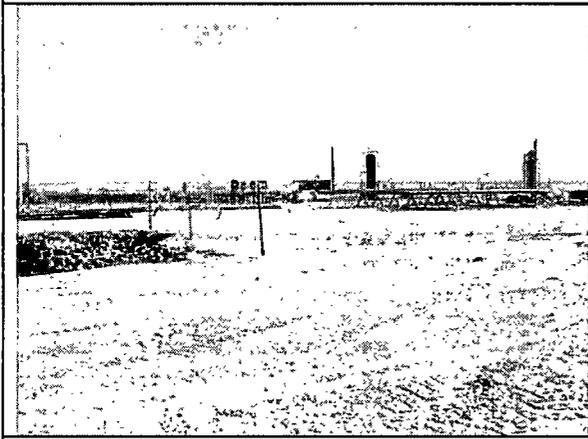
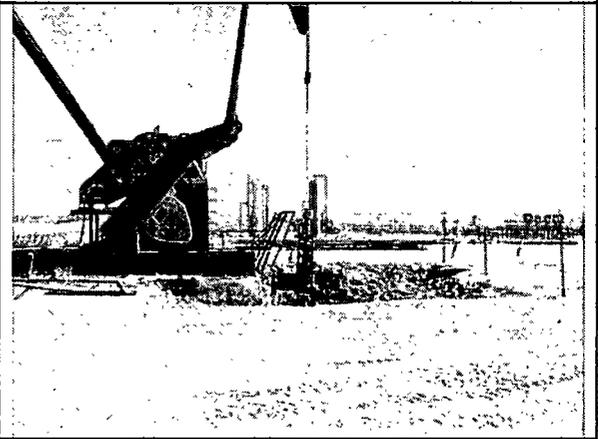
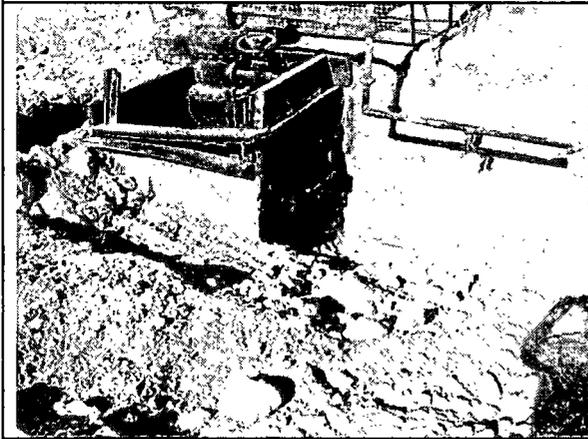
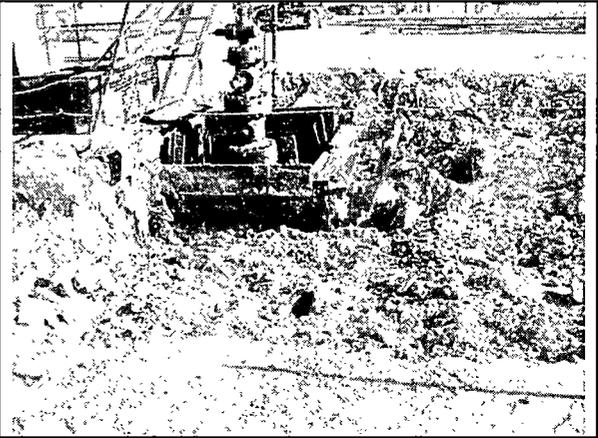
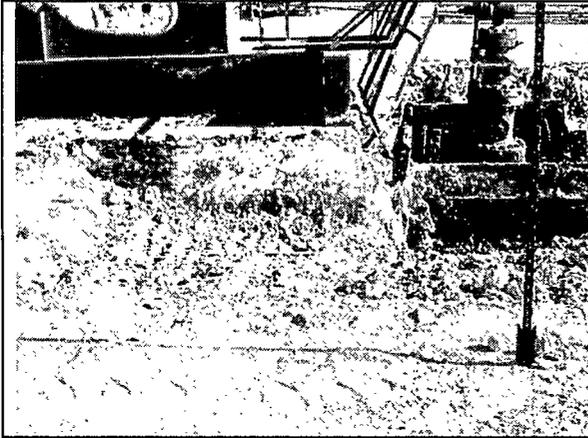
Coolers Unpacked/Checked by: [Signature]

Date: 4-14

NCRs (y/n): ✓

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

Site Photographs  
SCB 23-3  
4-13-2006



**Bratcher, Mike, EMNRD**

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**From:** Greg Swindle [greg@wbesi.com]  
**Sent:** Friday, May 05, 2006 1:09 PM  
**To:** 'Tony Tucker'; Bratcher, Mike, EMNRD  
**Cc:** 'Linda Stiles'  
**Subject:** SCB 23-3 or SCB 3B  
**Attachments:** SCB 23-3 5-5-06.pdf

Tony and Mike,

Attached is a letter and sample analysis showing that the referenced site is still above remediation limits.

Tony, please continue excavation for one more time. Another 12-18 inches maybe will clear this site. If we do not achieve limits at that time way may need to research another form of closure.

Mike, please review that attached results. We will be contacting you at least 48 hours prior to the next sampling event. If you have any questions please don't hesitate to call.

If any of you need a hard copy of this let me know. A hard copy of all results, photographs, and complete documentation will be furnished to all in a bound final report upon obtaining closure limits.

**Greg Swindle**

President  
White Buffalo Environmental Services, Inc.  
5425 Ben Ficklin Road  
San Angelo, Texas 76904  
Phone (325) 651-9054  
Fax (325) 651-2125  
Cell (325) 895-0410

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**From:** Deepa Floyd [mailto:deepa@wbesi.com]  
**Sent:** Friday, May 05, 2006 1:52 PM  
**To:** Greg Swindle  
**Subject:** SCB 23-3

***Deepa Floyd***

White Buffalo Environmental Services, Inc.  
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