

**BW - \_\_\_\_\_ 18 \_\_\_\_\_**

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

**2006 - Present**

**Griswold, Jim, EMNRD**

---

**From:** Griswold, Jim, EMNRD  
**Sent:** Wednesday, July 24, 2013 8:07 AM  
**To:** 'wayne price'  
**Cc:** Mike Slaughter; gnance@keyenergy.com  
**Subject:** RE: Key Truckers II BW-18 Brine Well Emergency Request

Please proceed with earthmoving activities.

Jim Griswold  
Senior Hydrologist  
EMNRD/Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
505.476.3465  
email: [jim.griswold@state.nm.us](mailto:jim.griswold@state.nm.us)

-----Original Message-----

From: wayne price [<mailto:wayneprice77@earthlink.net>]  
Sent: Tuesday, July 23, 2013 9:27 PM  
To: Griswold, Jim, EMNRD  
Cc: Mike Slaughter; [gnance@keyenergy.com](mailto:gnance@keyenergy.com)  
Subject: Key Truckers II BW-18 Brine Well Emergency Request

Dear Jim,

Pursuant to our meeting today Key Energy is going to remove a contaminated dirt pile and dispose of at the Gandy-Marley OCD permitted facility, and back-haul red bed clay and install in bottom of pit, compacted to a proctor density 90%+. The existing liner and leak detection of the pit has been removed and we are concerned about run-off from the adjacent contaminated dirt pile causing a possible infiltration of pore water in excess of the WQCC standards.

I have attached for a quick reference of an aerial plot plan, a site investigation map and corresponding results of the borings. We have removed more than 5000 yards out of the pit, with the most heavily concentrated being place adjacent to and on the north side of the pit. We are experiencing some rains and as discussed, we do not want to cause a groundwater impact since the liner has been removed.

This action will prevent a groundwater impact. Please note, as discussed, the old R&R company operated an illegal dump pit for years. The OCD took action and required a clean-up which has been completed, but there was no follow-up on the groundwater impact.

Please note, it does appear that Key's pit did not cause any groundwater contamination as show on the sampling boring report. It does appear the old R&R pit did impact groundwater and has migrated under and across our site.

Once we install the protective barrier then we will have time to strategize on the final closure. Our intention will most likely blend the remaining soils to an acceptable level and backfill the pit. We will seek a closure request before we take that next step. This will allow us time to submit a budget plan to our Houston folks.

We would appreciate an acknowledgement of our actions ASAP!

Sincerely,

## Griswold, Jim, EMNRD

---

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**To:** Griswold, Jim, EMNRD  
**Cc:** Mike Slaughter; gnance@keyenergy.com  
**Subject:** Key Truckers II BW-18 Brine Well Emergency Request  
**Attachments:** BW-18 Truckers II.pdf

Dear Jim,

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Sincerely,

Wayne Price

**BW-18**

**Key Energy  
Hobbs Truckers II**

**Correspondence  
2013**

**Griswold, Jim, EMNRD**

---

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Sincerely,



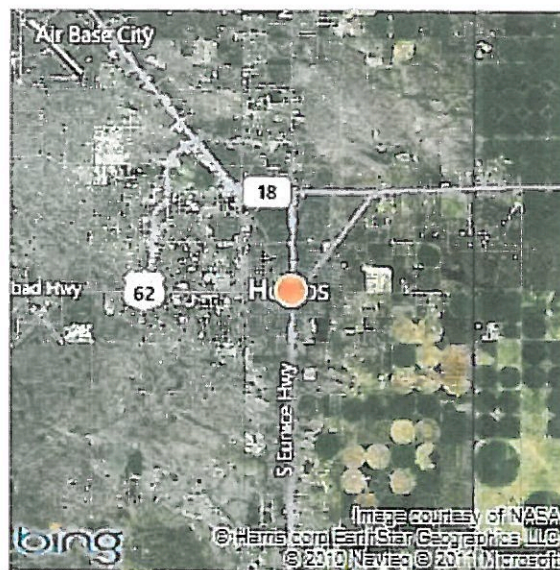
Hobbs, NM

My Notes

Truckers 2



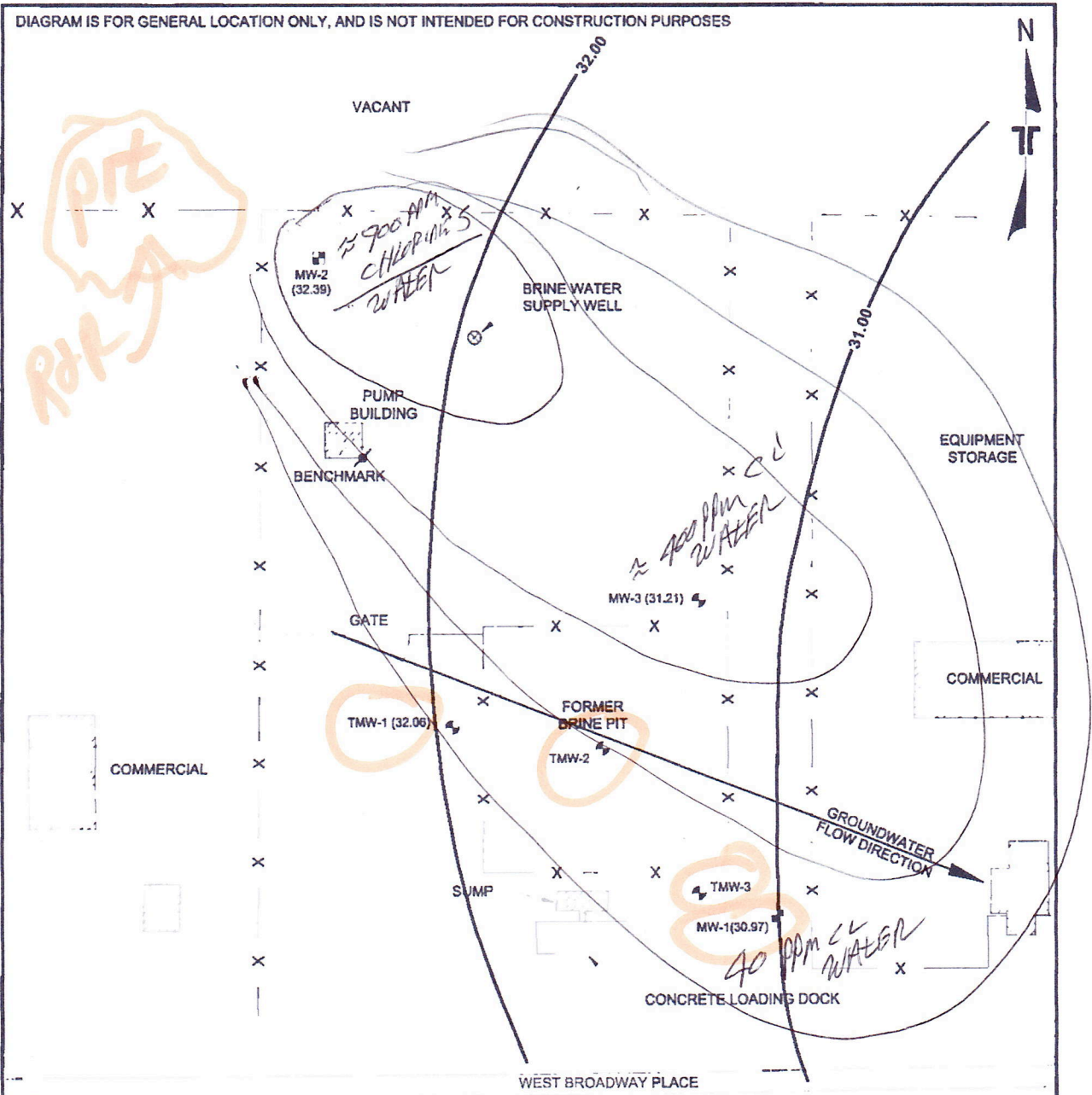
On the go? Use [m.bing.com](http://m.bing.com) to find maps, directions, businesses, and more



100' x 50'



DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES



LEGEND	
--X--	FENCE
⚡	TEMPORARY MONITORING WELL
■	PERMANENT MONITORING WELL

NOTE: ELEVATIONS ARE SET TO AN ARBITRARY 100' BENCHMARK

Project Manager:	WB
Drawn by:	RF
Checked by:	WB
Approved by:	BB
Project No.	A4117048
Scale:	AS SHOWN
File Name:	A4117048
Date:	06/20/2011

**Terracon**  
Consulting Engineers & Scientists  
1211 W Florida Street  
Midland, Texas 79701  
Ph: (432) 684 8800 FAX: (432) 684 9608

GROUNDWATER GRADIENT MAP FOR 6-10-2011

TRUCKER'S # 2 BRINE STATION  
WEST BROADWAY PLACE  
HOBBS, LEE COUNTY, NEW MEXICO

Figure

3

Table 1

## CONCENTRATIONS OF CHLORIDES IN SOIL

Key Energy Services, Inc.  
Trucker's #2 Brine Station  
Lea County, NM  
Terracon Project Number A4117046

All concentrations are in mg/ kg

SAMPLE LOCATION	SAMPLE DATE	SAMPLE INTERVAL	EPA Method 300.1
			Total Chlorides
TMW-1	06/08/11	0-5 fbgs	2,770
TMW-1	06/08/11	5-7 fbgs	2,110
TMW-1	06/08/11	8-10 fbgs	1,650
TMW-1	06/08/11	20-22 fbgs	541
TMW-1	06/08/11	30-32 fbgs	194
TMW-1	06/08/11	40-42 fbgs	83.5
TMW-1	06/08/11	50-52 fbgs	67.1
TMW-1	06/08/11	60-62 fbgs	18.0
TMW-2	06/08/11	0-2 fbgs	5,130
TMW-2	06/08/11	2-4 fbgs	6,180
TMW-2	06/08/11	4-6 fbgs	4,780
TMW-2	06/08/11	6-8 fbgs	5,580
TMW-2	06/08/11	8-10 fbgs	3,340
TMW-2	06/08/11	20-22 fbgs	27.7
TMW-2	06/08/11	30-32 fbgs	50.5
TMW-2	06/08/11	40-42 fbgs	72.1
TMW-2	06/08/11	50-52 fbgs	36.3
TMW-3	06/09/11	0-2 fbgs	3,170
TMW-3	06/09/11	2-4 fbgs	3,370
TMW-3	06/09/11	4-6 fbgs	2,710
TMW-3	06/09/11	6-8 fbgs	1,890
TMW-3	06/09/11	8-10 fbgs	1,250
TMW-3	06/09/11	20-22 fbgs	127
TMW-3	06/09/11	30-32 fbgs	146
TMW-3	06/09/11	40-42 fbgs	64.5
TMW-3	06/09/11	50-52 fbgs	45.9
TMW-3	06/09/11	60-62 fbgs	72.3
MW-3	06/09/11	0-2 fbgs	555
MW-3	06/09/11	2-4 fbgs	1,530
MW-3	06/09/11	4-6 fbgs	1,610
MW-3	06/09/11	6-8 fbgs	1,200
MW-3	06/09/11	8-10 fbgs	847
MW-3	06/09/11	20-22 fbgs	811
MW-3	06/09/11	30-32 fbgs	645
MW-3	06/09/11	40-42 fbgs	145
MW-3	06/09/11	50-52 fbgs	130
MW-3	06/09/11	60-62 fbgs	40.7

## NOTES:

fbgs = feet below ground surface

TMW-2 was advanced beginning 10 fbgs, making the sample interval effectively 10 feet deeper than documented on laboratory identification information.

## Griswold, Jim, EMNRD

---

**From:** Griswold, Jim, EMNRD  
**Sent:** Wednesday, April 02, 2014 10:12 AM  
**To:** 'wayne price'; Leking, Geoffrey R, EMNRD  
**Cc:** Mike Slaughter; Dan Gibson  
**Subject:** RE: Hobbs Brine Well MW samples

I have not had a chance to review the closure report recently submitted, but doing the general chemistry on the groundwater samples is fine as long as you have no indications from the soil work previously completed that there was any hydrocarbon contamination.

Jim Griswold  
Senior Hydrologist  
EMNRD/Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
505.476.3465  
email: [jim.griswold@state.nm.us](mailto:jim.griswold@state.nm.us)

-----Original Message-----

From: wayne price [<mailto:wayneprice77@earthlink.net>]  
Sent: Wednesday, April 02, 2014 9:59 AM  
To: Griswold, Jim, EMNRD; Leking, Geoffrey R, EMNRD  
Cc: Mike Slaughter; Dan Gibson  
Subject: Hobbs Brine Well MW samples

Dear Jim,

As you know there are three MW's at the Hobbs Brine well site. Per your recommendations we would like to take the final MW samples for confirmation. Is general chemistry ok, which includes the major cats/  
Ans, ph, tds, density? These are groundwater samples.

## Chavez, Carl J, EMNRD

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Wednesday, June 09, 2010 3:05 PM  
**To:** 'Gibson, Dan'  
**Cc:** Sanchez JR, Louis; Leking, Geoffrey R, EMNRD  
**Subject:** RE: Key Energy Services - Trucker's Brine Station No. 02 (BW-018)

Mr. Gibson:

OCD Santa Fe spoke with OCD Hobbs about this the other day. Based on the situation, OCD hereby approves disposal of the residual stormwater fluids in the lined pits into the OCD permitted UIC Class II Salt Water Disposal Well in good working condition.

Please be advised that while OCD regards the waste to be an "oilfield waste"; however, not listed as either exempt or non-exempt oilfield waste, OCD considers this an exception to be approved on a case-by case basis.

Please contact me if you have questions. Thank you.

*Note: Please be advised that OCD approval of this request does not relieve Key Environmental Services, L.L.C. of responsibility should their operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Key Environmental Services, L.L.C. of responsibility for compliance with any other federal, state, or local laws and/or regulations.*

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3490  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/oed/index.htm>  
(Pollution Prevention Guidance is under "Publications")

---

**From:** Gibson, Dan [mailto:[dgibson@keyenergy.com](mailto:dgibson@keyenergy.com)]  
**Sent:** Wednesday, June 09, 2010 11:54 AM  
**To:** Chavez, Carl J, EMNRD  
**Cc:** Sanchez JR, Louis  
**Subject:** FW: Key Energy Services - Trucker's Brine Station No. 02

Mr. Chavez:

Key is working to close the subject brine pit in Hobbs. The brine well was plugged and the remaining tasks consist of closing the pit and removing some other surface equipment. The lined pit measures about 140 ft on each side and has an unknown depth. We would like to pump out and sell the brine in the pit since it is about 9.9 pound brine. Once the usable fluids are removed, we would like to dispose of the remaining fluids at a SWD.

Per Geoffrey Leking's instructions, the fluids were sampled for TPH, BTEX and chlorides. This sampling results and lab report was sent to Mr. Leking. Other than a high chloride concentration, nothing significant was detected. This is not surprising as this is a brine pit. OCD has now indicated, "OCD may want a RCRA Characteristically Hazardous Waste test run to ensure that it is not characteristically hazardous before injection into a UIC Class II SWD Well." I do not understand why additional waste characterization is necessary. The use of generator knowledge is acceptable to EPA for waste characterization purposes and would seem to be appropriate for the fluids in this pit.

Key's preferred way to close this pit is to remove the usable fluids and to transport the remaining fluids to a SWD. There is likely some dirt that has blown into the pit over the years so that some of the fluids are not usable. There is also salt 'crust' on the top of the pit. Key's preferred way to remove this is to slurry this material so it can be pumped out for disposal. This material could be excavated, but this would cause damage to the liner and would result in contamination to the soil underlying the pit. If we can empty the pit by pumping, rather than digging, we can inspect the pit to determine where leaks may have occurred. The main advantage to pumping is that the liner will not be damaged and soil contamination will be minimized.

Please advise if residual fluids can be disposed of at a SWD. If additional testing is *required*, please direct Key to perform such analysis with the understanding if the material is determined to be non-hazardous, the fluids will be allowed to be disposed of in a SWD.

Please contact me as needed.

Thanks.

---

**Daniel K. Gibson, P.G. | Key Energy Services, Inc.** | Corporate Environmental Director  
6 Desta Drive, Suite 4400, Midland, TX 79705 | o: 432.571.7536 | c: 432.638-6134 | e: [dgibson@keyenergy.com](mailto:dgibson@keyenergy.com)

---

**From:** Sanchez JR, Louis  
**Sent:** Wednesday, June 09, 2010 11:18 AM  
**To:** Gibson, Dan  
**Subject:** FW: Key Energy Services - Trucker's Brine Station No. 02

FYI below.

**Louis Sanchez | Key Energy Services, Inc.**  
| Corporate Environmental Specialist II  
| 6 Desta Drive, ste. 4400, Midland, TX 79705  
| o: 432.571.7382 | c: 432.230.7926 | e: [lsanchez@keyenergy.com](mailto:lsanchez@keyenergy.com)

-----Original Message-----

**From:** Leking, Geoffrey R, EMNRD [<mailto:GeoffreyR.Leking@state.nm.us>]  
**Sent:** Wednesday, June 09, 2010 11:15 AM  
**To:** Sanchez JR, Louis  
**Subject:** RE: Key Energy Services - Trucker's Brine Station No. 02

Louis

I remember the conversation. However, Carl is interested in having the testing performed. That is about all I can tell you. Looking forward to your response. Thank you.

Environmental Engineer  
NMOCD-Hobbs  
1625 N. French Drive  
Hobbs, NM 88240  
Office: (575) 393-6161 Ext. 113  
Cell: (575) 399-2990  
email: [geoffreyr.leking@state.nm.us](mailto:geoffreyr.leking@state.nm.us)

---

**From:** Sanchez JR, Louis [mailto:lsanchez@keyenergy.com]  
**Sent:** Tuesday, June 08, 2010 9:39 AM  
**To:** Leking, Geoffrey R, EMNRD  
**Cc:** Gibson, Dan  
**Subject:** RE: Key Energy Services - Trucker's Brine Station No. 02

Mr. Leking-

Thank you for getting back to me so soon. It was our understanding that the analysis that you ask for two weeks ago (BTEX, TPH, and Chlorides) was all the waste characterization that we needed. This is a brine storage pit and there is no reason to believe that the fluids are hazardous. It would seem reasonable and appropriate to classify this as non-hazardous based on generator knowledge. This is an EPA approved method for waste characterization. Please let me know if you concur that no RCRA sampling is required and we will get started ASAP on the closure process.

**Louis Sanchez | Key Energy Services, Inc.**

| Corporate Environmental Specialist II  
| 6 Desta Drive, ste. 4400, Midland, TX 79705  
| o: 432.571.7382 | c: 432.230.7926 | e:lsanchez@keyenergy.com

-----Original Message-----

**From:** Leking, Geoffrey R, EMNRD [mailto:GeoffreyR.Leking@state.nm.us]  
**Sent:** Tuesday, June 08, 2010 10:12 AM  
**To:** Sanchez JR, Louis  
**Subject:** Key Energy Services - Trucker's Brine Station No. 02

Mr. Sanchez

NMOCD conditionally approves Key's proposal of injecting the fluid contained in the emergency pit at the Trucker's Brine Station No. 2 down one of Key's SWD wells. The company should perform RCRA characteristic waste testing on the fluid and may inject the fluid only if it passes the testing. It should be noted, that situations such as the one which is the subject of this correspondence, are evaluated by the NMOCD on a case by case basis and that it is preferable that fluid such as that involved here, be sold, used in an appropriate manner or reinjected down a brine producing well, if possible. Please contact me if you have any questions. Thank you.

Geoffrey Leking  
Environmental Engineer  
NMOCD-Hobbs  
1625 N. French Drive  
Hobbs, NM 88240  
Office: (575) 393-6161 Ext. 113  
Cell: (575) 399-2990  
email: geoffreyr.leking@state.nm.us

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**Chavez, Carl J, EMNRD**

---

**From:** Leking, Geoffrey R, EMNRD  
**Sent:** Wednesday, June 02, 2010 11:52 AM  
**To:** Chavez, Carl J, EMNRD  
**Subject:** FW: Truckers 2 Brine Station Results  
**Attachments:** Report\_Packet.pdf

Carl

Please advise on how to handle this site. Thanks.

Geoff

---

**From:** Gibson, Dan [mailto:dgibson@keyenergy.com]  
**Sent:** Tuesday, June 01, 2010 4:00 PM  
**To:** Leking, Geoffrey R, EMNRD  
**Cc:** Sanchez JR, Louis  
**Subject:** Truckers 2 Brine Station Results

Mr. Leking:

Attached are the results for the water sample collected from the brine pit at the Truckers 2 Brine Station in Hobbs. Key would like authorization to dispose of the pit liquids at a Key owned SWD if the fluids cannot be utilized as brine.

The sample results indicated that no BTEX constituents were detected at concentrations above 0.002 mg/L. TPH was reported at a concentration of 0.45 mg/L. Chlorides were reported at a concentration of 185,000 mg/L, which corresponds to almost 9.9 pound brine.

Please call me if you have any questions regarding this data or my request.

Thanks.

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**Daniel K. Gibson, P.G. | Key Energy Services, Inc.** | Corporate Environmental Manager  
6 Desta Drive, Suite 4400, Midland, TX 79705 | o: 432.571.7536 | c: 432.638-6134 | e: dgibson@keyenergy.com



6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298  
200 East Sunset Road, Suite E El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944  
5002 Basin Street, Suite A1 Midland, Texas 79703 432•689•6301 FAX 432•689•6313  
6015 Harris Parkway, Suite 110 Ft. Worth, Texas 76132 817•201•5260  
E-Mail: lab@traceanalysis.com

## Certifications

**WBENC:** 237019 **HUB:** 1752439743100-86536 **DBE:** VN 20657  
**NCTRCA** WFWB38444Y0909

## NELAP Certifications

**Lubbock:** T104704219-08-TX **El Paso:** T104704221-08-TX **Midland:** T104704392-08-TX  
LELAP-02003  
Kansas E-10317  
LELAP-02002

## Analytical and Quality Control Report

Louis Sanchez  
Key Energy Services-Midland  
6 Desta Drive  
Suite 4400  
Midland, TX, 79705

Report Date: May 26, 2010

Work Order: 10052027



Project Location: 1502 W. Broadway Place, Hobbs, NM 88240  
Project Name: Truckers Brine Station #2  
Project Number: NM-13036

Enclosed are the Analytical Report and Quality Control Report for the following sample(s) submitted to TraceAnalysis, Inc.

Sample	Description	Matrix	Date Taken	Time Taken	Date Received
232393	WC-001	water	2010-05-20	13:15	2010-05-20

These results represent only the samples received in the laboratory. The Quality Control Report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

This report consists of a total of 14 pages and shall not be reproduced except in its entirety, without written approval of TraceAnalysis, Inc.



---

Dr. Blair Leftwich, Director  
Dr. Michael Abel, Project Manager

**Standard Flags**

**B** - The sample contains less than ten times the concentration found in the method blank.

## Case Narrative

Samples for project Truckers Brine Station #2 were received by TraceAnalysis, Inc. on 2010-05-20 and assigned to work order 10052027. Samples for work order 10052027 were received intact without headspace and at a temperature of 9.0 C.

Samples were analyzed for the following tests using their respective methods.

Test	Method	Prep Batch	Prep Date	QC Batch	Analysis Date
BTEX	S 8021B	60231	2010-05-24 at 17:00	70344	2010-05-25 at 05:30
Chloride (IC)	E 300.0	60258	2010-05-24 at 14:38	70409	2010-05-25 at 02:01
TPH DRO - NEW	S 8015 D	60174	2010-05-21 at 09:48	70285	2010-05-21 at 09:48
TPH - Extended Ranges New	TX1005	60175	2010-05-21 at 09:48	70286	2010-05-21 at 09:48
TPH GRO	S 8015 D	60231	2010-05-24 at 17:00	70345	2010-05-25 at 05:58

Results for these samples are reported on a wet weight basis unless data package indicates otherwise.

A matrix spike (MS) and matrix spike duplicate (MSD) sample is chosen at random from each preparation batch. The MS and MSD will indicate if a site specific matrix problem is occurring, however, it may not pertain to the samples for work order 10052027 since the sample was chosen at random. Therefore, the validity of the analytical data reported has been determined by the laboratory control sample (LCS) and the method blank (MB). These quality control measures are performed with each preparation batch to ensure data integrity.

All other exceptions associated with this report have been footnoted on the appropriate analytical page to assist in general data comprehension. Please contact the laboratory directly if there are any questions regarding this project.

Report Date: May 26, 2010  
NM-13036

Work Order: 10052027  
Truckers Brine Station #2

Page Number: 4 of 14  
1502 W. Broadway Place, Hobbs, NM 88240

## Analytical Report

### Sample: 232393 - WC-001

Laboratory: Midland  
Analysis: BTEX  
QC Batch: 70344  
Prep Batch: 60231

Analytical Method: S 8021B  
Date Analyzed: 2010-05-25  
Sample Preparation: 2010-05-24

Prep Method: S 5030B  
Analyzed By: AG  
Prepared By: AG

Parameter	Flag	RL Result	Units	Dilution	RL
Benzene		<0.00200	mg/L	2	0.00100
Toluene		<0.00200	mg/L	2	0.00100
Ethylbenzene		<0.00200	mg/L	2	0.00100
Xylene		<0.00200	mg/L	2	0.00100

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.171	mg/L	2	0.200	86	65.2 - 130.3
4-Bromofluorobenzene (4-BFB)		0.194	mg/L	2	0.200	97	51.1 - 121.7

### Sample: 232393 - WC-001

Laboratory: Lubbock  
Analysis: Chloride (IC)  
QC Batch: 70409  
Prep Batch: 60258

Analytical Method: E 300.0  
Date Analyzed: 2010-05-25  
Sample Preparation: 2010-05-24

Prep Method: N/A  
Analyzed By: SS  
Prepared By: SS

Parameter	Flag	RL Result	Units	Dilution	RL
Chloride		185000	mg/L	10000	2.50

### Sample: 232393 - WC-001

Laboratory: Midland  
Analysis: TPH - Extended Ranges New  
QC Batch: 70286  
Prep Batch: 60175

Analytical Method: TX1005  
Date Analyzed: 2010-05-21  
Sample Preparation: 2010-05-21

Prep Method: N/A  
Analyzed By: kg  
Prepared By: kg

Parameter	Flag	RL Result	Units	Dilution	RL
C6-C12		<5.00	mg/L	1	5.00
>C12-C28		<5.00	mg/L	1	5.00
>C28-C35		<5.00	mg/L	1	5.00
Total TPH		0.450	mg/L	1	0.00

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Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Triacontane		8.51	mg/L	1	10.0	85	70 - 130
n-Octane		10.7	mg/L	1	10.0	107	70 - 130
n-Tricosane		8.02	mg/L	1	10.0	80	70 - 130

**Sample: 232393 - WC-001**

Laboratory: Midland

Analysis: TPH DRO - NEW

QC Batch: 70285

Prep Batch: 60174

Analytical Method: S 8015 D

Date Analyzed: 2010-05-21

Sample Preparation: 2010-05-21

Prep Method: N/A

Analyzed By: kg

Prepared By: kg

Parameter	Flag	RL Result	Units	Dilution	RL
DRO		<5.00	mg/L	1	5.00

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Tricosane		8.09	mg/L	1	10.0	81	70 - 130

**Sample: 232393 - WC-001**

Laboratory: Midland

Analysis: TPH GRO

QC Batch: 70345

Prep Batch: 60231

Analytical Method: S 8015 D

Date Analyzed: 2010-05-25

Sample Preparation: 2010-05-24

Prep Method: S 5030B

Analyzed By: AG

Prepared By: AG

Parameter	Flag	RL Result	Units	Dilution	RL
GRO	1	<0.200	mg/L	2	0.100

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.175	mg/L	2	0.200	88	69.8 - 110.2
4-Bromofluorobenzene (4-BFB)		0.190	mg/L	2	0.200	95	65.4 - 118.8

**Method Blank (1)**      QC Batch: 70285

QC Batch: 70285

Prep Batch: 60174

Date Analyzed: 2010-05-21

QC Preparation: 2010-05-21

Analyzed By: kg

Prepared By: kg

<sup>1</sup>Sample dilution necessitated due to the presence of surfactants in sample.

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Parameter	Flag	MDL Result	Units	RL
DRO		1.05	mg/L	5

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Tricosane		11.0	mg/L	1	10.0	110	70 - 130

**Method Blank (1)**      QC Batch: 70286

QC Batch: 70286  
Prep Batch: 60175

Date Analyzed: 2010-05-21  
QC Preparation: 2010-05-21

Analyzed By: kg  
Prepared By: kg

Parameter	Flag	MDL Result	Units	RL
C6-C12		<0.578	mg/L	5
>C12-C28		<0.541	mg/L	5
>C28-C35		<0.541	mg/L	5
Total TPH		0.500	mg/L	

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
n-Triacontane		12.6	mg/L	1	10.0	126	70 - 130
n-Octane		13.0	mg/L	1	10.0	130	70 - 130
n-Tricosane		10.9	mg/L	1	10.0	109	70 - 130

**Method Blank (1)**      QC Batch: 70344

QC Batch: 70344  
Prep Batch: 60231

Date Analyzed: 2010-05-25  
QC Preparation: 2010-05-24

Analyzed By: AG  
Prepared By: AG

Parameter	Flag	MDL Result	Units	RL
Benzene		<0.000300	mg/L	0.001
Toluene		<0.000200	mg/L	0.001
Ethylbenzene		<0.000200	mg/L	0.001
Xylene		<0.000900	mg/L	0.001

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.106	mg/L	1	0.100	106	73.6 - 126.6
4-Bromofluorobenzene (4-BFB)		0.105	mg/L	1	0.100	105	62.6 - 117.5

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**Method Blank (1)**      QC Batch: 70345

QC Batch: 70345  
Prep Batch: 60231

Date Analyzed: 2010-05-25  
QC Preparation: 2010-05-24

Analyzed By: AG  
Prepared By: AG

Parameter	Flag	MDL Result	Units	RL
GRO		<0.0462	mg/L	0.1

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
Trifluorotoluene (TFT)		0.109	mg/L	1	0.100	109	58.6 - 116.8
4-Bromofluorobenzene (4-BFB)		0.103	mg/L	1	0.100	103	43 - 130.8

**Method Blank (1)**      QC Batch: 70409

QC Batch: 70409  
Prep Batch: 60258

Date Analyzed: 2010-05-25  
QC Preparation: 2010-05-24

Analyzed By: SS  
Prepared By: SS

Parameter	Flag	MDL Result	Units	RL
Chloride		<0.0402	mg/L	2.5

**Laboratory Control Spike (LCS-1)**

QC Batch: 70285  
Prep Batch: 60174

Date Analyzed: 2010-05-21  
QC Preparation: 2010-05-21

Analyzed By: kg  
Prepared By: kg

Param	LCS Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit
DRO	24.2	mg/L	1	25.0	<0.801	97	70 - 130

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	LCSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit	RPD	RPD Limit
DRO	27.7	mg/L	1	25.0	<0.801	111	70 - 130	14	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Surrogate	LCS Result	LCSD Result	Units	Dil.	Spike Amount	LCS Rec.	LCSD Rec.	Rec. Limit
n-Tricosane	10.6	9.52	mg/L	1	10.0	106	95	70 - 130

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#### Laboratory Control Spike (LCS-1)

QC Batch: 70286  
Prep Batch: 60175

Date Analyzed: 2010-05-21  
QC Preparation: 2010-05-21

Analyzed By: kg  
Prepared By: kg

Param	LCS Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit
C6-C12	23.8	mg/L	1	25.0	<0.578	95	75 - 125
>C12-C28	24.7	mg/L	1	25.0	<0.541	99	75 - 125
Total TPH	48.5	mg/L	1	0.00	0		-

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	LCSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit	RPD	RPD Limit
C6-C12	24.6	mg/L	1	25.0	<0.578	98	75 - 125	3	20
>C12-C28	27.1	mg/L	1	25.0	<0.541	108	75 - 125	9	20
Total TPH	52.4	mg/L	1	0.00	0		-	8	

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Surrogate	LCS Result	LCSD Result	Units	Dil.	Spike Amount	LCS Rec.	LCSD Rec.	Rec. Limit
n-Triacontane	11.4	10.9	mg/L	1	10.0	114	109	70 - 130
n-Octane	12.3	13.0	mg/L	1	10.0	123	130	70 - 130
n-Tricosane	10.6	9.58	mg/L	1	10.0	106	96	70 - 130

#### Laboratory Control Spike (LCS-1)

QC Batch: 70344  
Prep Batch: 60231

Date Analyzed: 2010-05-25  
QC Preparation: 2010-05-24

Analyzed By: AG  
Prepared By: AG

Param	LCS Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit
Benzene	0.0988	mg/L	1	0.100	<0.000300	99	79.4 - 112.4
Toluene	0.0993	mg/L	1	0.100	<0.000200	99	79.3 - 110
Ethylbenzene	0.0991	mg/L	1	0.100	<0.000200	99	73.8 - 113.1
Xylene	0.298	mg/L	1	0.300	<0.000900	99	73.9 - 113.6

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	LCSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit	RPD	RPD Limit
Benzene	0.0994	mg/L	1	0.100	<0.000300	99	79.4 - 112.4	1	20
Toluene	0.0994	mg/L	1	0.100	<0.000200	99	79.3 - 110	0	20
Ethylbenzene	0.0997	mg/L	1	0.100	<0.000200	100	73.8 - 113.1	1	20
Xylene	0.299	mg/L	1	0.300	<0.000900	100	73.9 - 113.6	0	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

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Surrogate	LCS Result	LCSD Result	Units	Dil.	Spike Amount	LCS Rec.	LCSD Rec.	Rec. Limit
Trifluorotoluene (TFT)	0.0991	0.101	mg/L	1	0.100	99	101	73.2 - 129.6
4-Bromofluorobenzene (4-BFB)	0.101	0.105	mg/L	1	0.100	101	105	77.9 - 119.8

#### Laboratory Control Spike (LCS-1)

QC Batch: 70345  
Prep Batch: 60231

Date Analyzed: 2010-05-25  
QC Preparation: 2010-05-24

Analyzed By: AG  
Prepared By: AG

Param	LCS Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit
GRO	0.794	mg/L	1	1.00	<0.0462	79	60.5 - 102.6

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	LCSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit	RPD	RPD Limit
GRO	0.809	mg/L	1	1.00	<0.0462	81	60.5 - 102.6	2	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Surrogate	LCS Result	LCSD Result	Units	Dil.	Spike Amount	LCS Rec.	LCSD Rec.	Rec. Limit
Trifluorotoluene (TFT)	0.104	0.103	mg/L	1	0.100	104	103	54.3 - 132.4
4-Bromofluorobenzene (4-BFB)	0.103	0.102	mg/L	1	0.100	103	102	71.8 - 111.2

#### Laboratory Control Spike (LCS-1)

QC Batch: 70409  
Prep Batch: 60258

Date Analyzed: 2010-05-25  
QC Preparation: 2010-05-24

Analyzed By: SS  
Prepared By: SS

Param	LCS Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit
Chloride	22.8	mg/L	1	25.0	<0.0402	91	90 - 110

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	LCSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit	RPD	RPD Limit
Chloride	22.6	mg/L	1	25.0	<0.0402	90	90 - 110	1	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

#### Matrix Spike (MS-1) Spiked Sample: 232393

QC Batch: 70285  
Prep Batch: 60174

Date Analyzed: 2010-05-21  
QC Preparation: 2010-05-21

Analyzed By: kg  
Prepared By: kg

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Param	MS Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit
DRO	26.9	mg/L	1	25.0	<0.801	108	70 - 130

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	MSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit	RPD	RPD Limit
DRO	32.2	mg/L	1	25.0	<0.801	129	70 - 130	18	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Surrogate	MS Result	MSD Result	Units	Dil.	Spike Amount	MS Rec.	MSD Rec.	Rec. Limit
n-Tricosane	7.63	8.53	mg/L	1	10	76	85	70 - 130

**Matrix Spike (MS-1)** Spiked Sample: 232393

QC Batch: 70286  
Prep Batch: 60175

Date Analyzed: 2010-05-21  
QC Preparation: 2010-05-21

Analyzed By: kg  
Prepared By: kg

Param	MS Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit
C6-C12	26.2	mg/L	1	25.0	<0.578	105	75 - 125
>C12-C28	28.4	mg/L	1	25.0	<0.541	114	75 - 125
Total TPH	54.7	mg/L	1	0.00	0		-

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	MSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit	RPD	RPD Limit
C6-C12	31.2	mg/L	1	25.0	<0.578	125	75 - 125	17	20
>C12-C28	25.2	mg/L	1	25.0	<0.541	101	75 - 125	12	20
Total TPH	56.5	mg/L	1	0.00	0		-	3	

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Surrogate	MS Result	MSD Result	Units	Dil.	Spike Amount	MS Rec.	MSD Rec.	Rec. Limit
n-Triacontane	7.89	9.09	mg/L	1	10	79	91	70 - 130
n-Octane	10.8	12.5	mg/L	1	10	108	125	70 - 130
n-Tricosane	7.77	8.21	mg/L	1	10	78	82	70 - 130

**Matrix Spike (MS-1)** Spiked Sample: 232518

QC Batch: 70344  
Prep Batch: 60231

Date Analyzed: 2010-05-25  
QC Preparation: 2010-05-24

Analyzed By: AG  
Prepared By: AG

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Param	MS Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit
Benzene	0.128	mg/L	1	0.100	0.0252	103	77.3 - 117.4
Toluene	0.104	mg/L	1	0.100	0.0035	100	75 - 111.8
Ethylbenzene	0.100	mg/L	1	0.100	<0.000200	100	78.8 - 106.6
Xylene	0.303	mg/L	1	0.300	0.0039	100	68.9 - 114

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	MSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit	RPD	RPD Limit
Benzene	0.124	mg/L	1	0.100	0.0252	99	77.3 - 117.4	3	20
Toluene	0.105	mg/L	1	0.100	0.0035	102	75 - 111.8	1	20
Ethylbenzene	0.102	mg/L	1	0.100	<0.000200	102	78.8 - 106.6	2	20
Xylene	0.309	mg/L	1	0.300	0.0039	102	68.9 - 114	2	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Surrogate	MS Result	MSD Result	Units	Dil.	Spike Amount	MS Rec.	MSD Rec.	Rec. Limit
Trifluorotoluene (TFT)	0.0867	0.101	mg/L	1	0.1	87	101	76.3 - 129.8
4-Bromofluorobenzene (4-BFB)	0.0895	0.104	mg/L	1	0.1	90	104	75.2 - 112.8

**Matrix Spike (MS-1)** Spiked Sample: 232393

QC Batch: 70345  
Prep Batch: 60231

Date Analyzed: 2010-05-25  
QC Preparation: 2010-05-24

Analyzed By: AG  
Prepared By: AG

Param	MS Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit
GRO	1.54	mg/L	1	2.00	<0.0462	77	10 - 159.8

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	MSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit	RPD	RPD Limit
GRO	1.40	mg/L	1	2.00	<0.0462	70	10 - 159.8	10	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Surrogate	MS Result	MSD Result	Units	Dil.	Spike Amount	MS Rec.	MSD Rec.	Rec. Limit
Trifluorotoluene (TFT)	<sup>2</sup> 3 0.116	0.0871	mg/L	1	0.2	58	44	69.7 - 116.1
4-Bromofluorobenzene (4-BFB)	<sup>4</sup> 5 0.129	0.0991	mg/L	1	0.2	64	50	71.3 - 118.9

<sup>2</sup>Surrogate out due to peak interference.

<sup>3</sup>Surrogate out due to peak interference.

<sup>4</sup>Surrogate out due to peak interference.

<sup>5</sup>Surrogate out due to peak interference.

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**Matrix Spike (MS-1)** Spiked Sample: 232393

QC Batch: 70409  
Prep Batch: 60258

Date Analyzed: 2010-05-25  
QC Preparation: 2010-05-24

Analyzed By: SS  
Prepared By: SS

Param	MS Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit
Chloride	431000	mg/L	10000	250000	185000	98	90 - 110

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Param	MSD Result	Units	Dil.	Spike Amount	Matrix Result	Rec.	Rec. Limit	RPD	RPD Limit
Chloride	431000	mg/L	10000	250000	185000	98	90 - 110	0	20

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

**Standard (CCV-1)**

QC Batch: 70285

Date Analyzed: 2010-05-21

Analyzed By: kg

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
DRO		mg/L	250	251	100	80 - 120	2010-05-21

**Standard (CCV-2)**

QC Batch: 70285

Date Analyzed: 2010-05-21

Analyzed By: kg

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
DRO		mg/L	250	243	97	80 - 120	2010-05-21

**Standard (CCV-1)**

QC Batch: 70286

Date Analyzed: 2010-05-21

Analyzed By: kg

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
C6-C12		mg/L	250	261	104	75 - 125	2010-05-21
>C12-C28		mg/L	250	269	108	75 - 125	2010-05-21

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**Standard (CCV-2)**

QC Batch: 70286

Date Analyzed: 2010-05-21

Analyzed By: kg

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
C6-C12		mg/L	250	248	99	75 - 125	2010-05-21
>C12-C28		mg/L	250	260	104	75 - 125	2010-05-21

**Standard (CCV-1)**

QC Batch: 70344

Date Analyzed: 2010-05-25

Analyzed By: AG

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
Benzene		mg/L	0.100	0.0961	96	80 - 120	2010-05-25
Toluene		mg/L	0.100	0.0972	97	80 - 120	2010-05-25
Ethylbenzene		mg/L	0.100	0.0966	97	80 - 120	2010-05-25
Xylene		mg/L	0.300	0.290	97	80 - 120	2010-05-25

**Standard (CCV-2)**

QC Batch: 70344

Date Analyzed: 2010-05-25

Analyzed By: AG

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
Benzene		mg/L	0.100	0.0989	99	80 - 120	2010-05-25
Toluene		mg/L	0.100	0.0985	98	80 - 120	2010-05-25
Ethylbenzene		mg/L	0.100	0.0971	97	80 - 120	2010-05-25
Xylene		mg/L	0.300	0.292	97	80 - 120	2010-05-25

**Standard (CCV-1)**

QC Batch: 70345

Date Analyzed: 2010-05-25

Analyzed By: AG

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
GRO		mg/L	1.00	0.974	97	80 - 120	2010-05-25

**Standard (CCV-2)**

QC Batch: 70345

Date Analyzed: 2010-05-25

Analyzed By: AG

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Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
GRO		mg/L	1.00	0.984	98	80 - 120	2010-05-25

**Standard (CCV-1)**

QC Batch: 70409

Date Analyzed: 2010-05-25

Analyzed By: SS

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
Chloride		mg/L	25.0	22.7	91	90 - 110	2010-05-25

**Standard (CCV-2)**

QC Batch: 70409

Date Analyzed: 2010-05-25

Analyzed By: SS

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
Chloride		mg/L	25.0	22.8	91	90 - 110	2010-05-25



**Chavez, Carl J, EMNRD**

**From:** Patterson, Bob [bpatterson@keyenergy.com]  
**Sent:** Friday, December 07, 2007 10:11 AM  
**To:** Chavez, Carl J, EMNRD  
**Cc:** Price, Wayne, EMNRD; Molleur, Loren  
**Subject:** RE: BW-18: KEY HOBBS TRUCKERS #2

Carl,

After visiting with the pulling unit operator, the reverse operator, the plugging supervisor, and Pete Turner, Hobbs Trucking yard manager, the only fluid that was flowed back was when the plugging unit went to rig up and there was still a little pressure on the wellhead. They had gotten there late that afternoon and decided to let the well bleed to the storage pit over night before they rigged up and put the BOP on. Other than that, there was no other flow of fluids.

Bob Patterson | Key Energy Services, LLC | Area Manager, Trucking Division | O: 505.394.2586 | C: 505.631.7597

-----Original Message-----

**From:** Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]  
**Sent:** Thursday, November 29, 2007 4:22 PM  
**To:** Patterson, Bob  
**Cc:** Price, Wayne, EMNRD  
**Subject:** BW-18: KEY HOBBS TRUCKERS #2

Bob:

Good afternoon. Today the OCD learned that the well had been plugged and abandoned (see attachment). The OCD is concerned about the flow of fluids as described on 3/29/07 in the C-103. Can you tell the OCD if the flow was above the red beds or below? Thanks.

Carl J. Chavez, CHMM  
 New Mexico Energy, Minerals & Natural Resources Dept.  
 Oil Conservation Division, Environmental Bureau  
 1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
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 Fax: (505) 476-3462  
 E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
 Website: <http://www.emnrd.state.nm.us/oed/index.htm>  
 (Pollution Prevention Guidance is under "Publications")

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12/7/2007

## Chavez, Carl J, EMNRD

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**From:** Chavez, Carl J, EMNRD  
**Sent:** Thursday, November 29, 2007 4:22 PM  
**To:** Patterson, Bob  
**Cc:** Price, Wayne, EMNRD  
**Subject:** BW-18: KEY HOBBS TRUCKERS #2  
**Attachments:** C-103.tif

Bob:

Good afternoon. Today the OCD learned that the well had been plugged and abandoned (see attachment). The OCD is concerned about the flow of fluids as described on 3/29/07 in the C-103. Can you tell the OCD is the flow was above the red beds or below? Thanks.

Carl J. Chavez, CHMM  
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Oil Conservation Division, Environmental Bureau  
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11/29/2007