

RECEIVED
APR 1 5 2010

NMOCD ARTESIA

esting • Excavation

Mr. Mike Bratcher Oil Conservation Division New Mexico Energy, Minerals and Natural Resources Department 1301 W. Grand Avenue Artesia, New Mexico 88210

Re: Remediation Workplan,

Marks and Garner Production LTD Co., Cave State #4

Unit Letter F (SE/4, NW/4), Section 4, Township 17 South, Range 29 East,

Eddy County, New Mexico

(Latitude: N 32.86636°, Longitude: W 104.08299°)

2RP #307

Dear Mr. Bratcher:

Marks and Garner Production LTD Co. (M&G), has retained Ocotillo Environmental, LLC (Ocotillo) to remediate impacts to soil from a leak at the Cave State #4 wellhead. The well is located in the southeast quarter (SE/4) of the northwest quarter (NW/4), Section 4, Township 17 South, Range 29 East, Eddy County, New Mexico (Site). The date and volume of the release are unknown. A C-141 was submitted to the New Mexico Oil Conservation Division (NMOCD) on April 9, 2009. Appendix A provides a copy of the C141. Figure 1 shows the site location.

Based on published literature (1961), well records of the New Mexico State Engineer, and well records of the United States Geological Survey, groundwater occurs at approximately 65 feet bgs in the well located nearest the Site. No domestic water wells are located within 1,000 feet of the site. The NMOCD has established recommended remediation action levels (RRALs) for benzene, total BTEX and TPH resulting from spills of natural gas liquids ("Guidelines for Remediation of Leaks, Spills and Releases, August 13, 1993"). Remediation levels for benzene, total BTEX and TPH were calculated using the following NMOCD criteria:

Criteria	Result	Ranking Score
Depth-to-Groundwater	50 - 99 Feet	10
Wellhead Protection Area	No	0
Distance to Surface Water Body	>1000 Horizontal Feet	0
		Total: 10

The following RRALs have been assigned based on NMOCD criteria:

Benzene

10 mg/kg

Total BTEX

50 mg/kg

TPH

1,000 mg/kg

Initial Investigation

On September 10, 2009, a letter was prepared for the NMOCD by R.T. Hicks Consultants, Ltd. (Hicks), that reported results of soil samples collected at the site in order to provide horizontal delineation of the spill. Hicks also provided documentation that groundwater in the area is confined, thereby making the depth to groundwater "not relevant". Appendix B provides a copy of the "Hicks" diagram (Plate 2D) showing sample point locations and chloride

Mr. Mike Bratcher Page 2 April 5, 2010

concentrations, as well as a copy of the "Hicks" table of Field and Laboratory Data - Soil Samples.

Current Investigation

On March 2, 2010, Ocotillo installed two (2) soil borings (BH-1 and BH-2) at the site, using an air rotary drilling rig, in order to further assess the horizontal and vertical limits of the spill. Soil samples from the exploratory borings were collected in five foot intervals from the ground surface to a depth of approximately 21 feet below ground surface (bgs). The soil borings were plugged with bentonite. Figure 2 shows the locations of the soil borings. Appendix C provides copies of the Well Record and Logs provided to the Office of the State Engineer.

The soil samples from borings BH-1 and BH-2 were placed in clean glass sample jars, labeled, and delivered under chain-of-custody control to Xenco Laboratories, located in Odessa, Texas. All soil samples collected from borings BH-1 and BH-2 were analyzed for chlorides by EPA method E300. Table 1 presents a summary of the laboratory analysis of soil samples. Laboratory analysis and chain of custody documentation are included in Appendix D.

Referring to Table 1, chloride concentrations in samples from boring BH-1 were above the NMOCD standard of 250 mg/kg until a depth of 20–21' bgs (123 mg/kg). The soil samples collected from background boring BH-2 all reported chloride concentrations below 250 mg/kg.

Proposed Remediation

Marks and Garner proposes to conduct excavation of the chloride impacted soil in the vicinity of soil boring BH-1 to a depth of approximately five (5) feet bgs. Horizontal delineation will be determined by laboratory analysis of samples collected during excavation. All excavated soil with a chloride concentration greater than 5,000 mg/kg will be hauled to an NMOCD approved disposal facility. Excavated soil with a chloride concentration less than 5,000 mg/kg will be blended on-site with organic material, in order to reduce the chloride concentrations to less than 1,000 mg/kg. A 20 mil plastic liner will be installed at the five foot depth, and the excavated areas will be backfilled with either clean soil or blended soil with a chloride concentration less than 1,000 mg/kg) will be used to construct firewalls around the Marks and Garner tank batteries and / or other ancillary equipment.

If you have any questions or need additional information, please call Mr. Quinton Welborn at (575) 631-0949, or myself at (575) 441-7244. We may also be reached by email at qwelborn@valornet.com or <u>Cindy.Crain@gmail.com</u>.

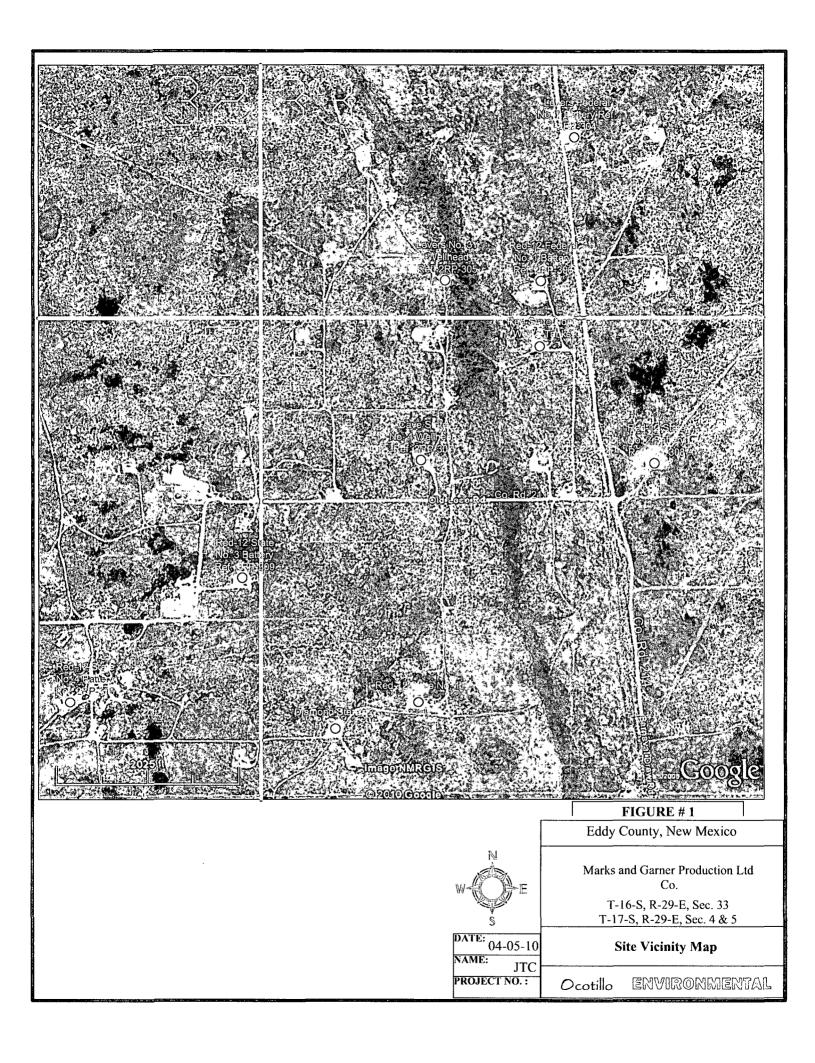
Sincerely,

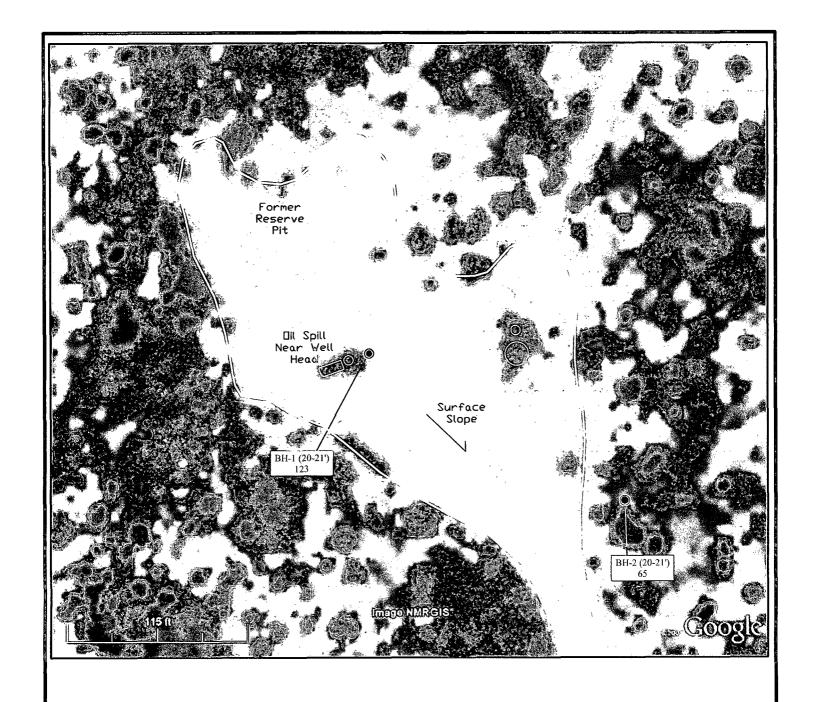
Ocotillo Environmental, LLC

Cindy K. Crain, P.G. Environmental Manager

cc: Quinton Welborn, Marks & Garner

FIGURES







BH-1 (20-21')

Boring Location With Depth (feet bgs) and Chloride Concentration (mg/kg)

GPS Coordinates

BH-1 N.32.86636 W.104.08299 BH-2 N.32.86617 W.104.08209



DATE: 04-05-10

NAME: JTC

PROJECT NO.: 0110-013C

FIGURE # 2

Eddy County, New Mexico

Marks and Garner

Cave State No. 4

T-17-S, R-29-E, Sec 4

Site Drawing With Boring Locations

Ocotillo

ENVIRONMENTAL

TABLE

Table 1:
Summary of Laboratory Analysis of Soil Samples from Soil Borings
Marks and Garner Production LTD Co., Cave State #4
Unit Letter F, Section 4, Township 17 South, Range 29 East
Eddy County, New Mexico

Sample Date	Bore Hole	Sample Depth (feet BGS)	Chloride (mg/kg)
3/2/10	BH-1	0 - 1	1580
3/2/10	BH-1	5 - 6	4550
3/2/10	BH-1	10 - 11	293
3/2/10	BH-1	15 - 16	462
3/2/10	BH-1	20 - 21	123
3/2/10	BH-2	0 - 1	<9.29
3/2/10	BH-2	5 - 6	262
3/2/10	BH-2	10 - 11	119
3/2/10	BH-2	15 - 16	68.6
3/2/10	BH-2	20 - 21	65.0

APPENDIX A INITIAL C141 DOCUMENTATION

District 1
1625 N French Dr., Hobbs, NM 88240
District II
1301 W Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 MAY - 7 2009 Form C-141
Revised October 10, 2003

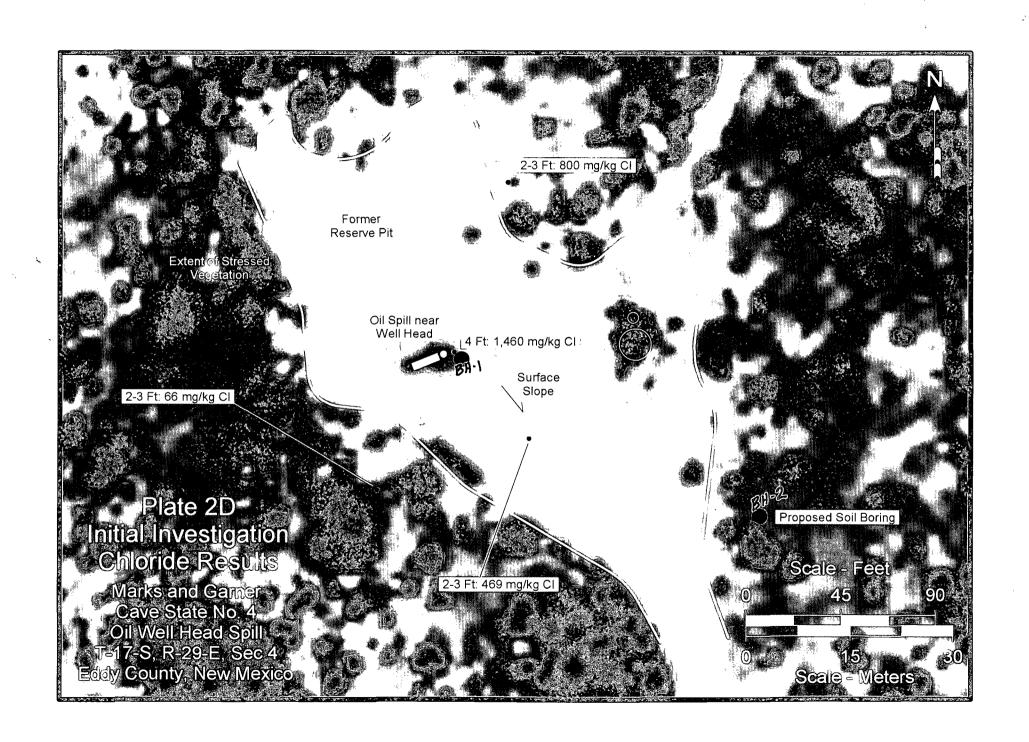
Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

30-015-24742 Release Notifica	tion a	and C	orrective A	etion					
nMLB 09/34 (1/126)	OPERATOR Initial Report Final Rep								
Name of Company Marks & Garner Production /4070			inton Welborn						
Address P.O. Box 1089			No. 575-393-93	58					
Facility Name (aue ST #4			oe Oil Well						
Surface Owner State Mineral Own	vner Marks & Garner Lease No.30-015-24742								
LOCAT	ION (ומשבר זור	FASE						
		th Line	County						
Oliving Township Range Teet nom the	011111111111111111111111111111111111111	in the	Feet from the	Lust W	est Line	County			
F 4 175 29/2 1650	N		1650	h	/	Ede	cly		
Latitude	L	ongitud	le						
NATU	SE VI	TREE	FASE						
Type of Release Lear		olume of			Volume R	ecovered -			
Source of Release			lour of Occurrence			Hour of Disc			
Was Immediate Notice Given?		YES, To			ioute una i	17001 01 1513	50101)		
Yes No Not Require	red	123, 10	,						
By Whom?	D	ate and H	OUF						
Was a Watercourse Reached?	lf	YES, Vo	lume Impacting th	he Water	course.				
Yes No									
ff a Watercourse was Impacted, Describe Fully.*									
Describe Cause of Problem and Remedial Action Taken.*									
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EFFECTEd GREd		C(/ ja	MELL	1 6226	ζ ς,	7			
Describe Area Affected and Cleanup Action Taken.*	······································								
Fix Leak.									
Lit Tour					,				
		_				•			
I hereby certify that the information given above is true and complete to									
regulations all operators are required to report and/or file certain release									
public health or the environment. The acceptance of a C-141 report by									
should their operations have failed to adequately investigate and remed									
or the environment. In addition, NMOCD acceptance of a C-141 repor federal, state, or local laws and/or regulations.	i does n	ot remeve	the operator of re	sponsibi	nty for coi	inphance wi	in any other		
			OIL CONS	ERVA	TION I	DIVISIO	7		
Signature: Denintant M.		a	igned By M	Ja j	1				
Printed Name: Quinton Welborn	Appro	oved by B	District Supervisor	<u>/ / _ ^ </u>	MICHILE				
Title: Manager	Appro	yal Date:	AY 1 4 2009	9 Exp	oiration Da	ite:			
E-mail Address: QWCLBORNED WAVERNET CON	Condi	tions of A	pprovai: Rema	diation	por	Attached }	×		
Date: Phone:	OCD	Rule	is & Guide	lines		rumenco g	_X		
ttach Additional Sheets If Necessary	L					1 24			
MCB0913439885					4 K1	0-307			
1 DATE: 4/9/09									
• •									

APPENDIX B

R.T. HICKS INITIAL INVESTIGATION

PLATE 2D And TABLE OF FIELD AND LABORATORY DATA



Marks & Garner - Cave State #4 Site

Field and Laboratory Data - Soil Samples

Sample Location	Depth (feet)	Sample Date	Field Cl (mg/kg)	Lab Cl (mg/kg)	PID (ppm)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	BTEX (mg/kg)	C ₆₋₁₂ (mg/kg)	C ₁₂₋₂₈ (mg/kg)	C ₂₈₋₃₅ (mg/kg)
Stockpile Soil		6/22/2009			185	0.0519	1.22	4.45	9.284	15.0	2,050	38,400	2,820
Oil Spill Area	2.0	6/22/2009			0							****	
	4.0	6/22/2009		1,460	0	< 0.0012	< 0.0024	< 0.0012	< 0.0024	<0.008	<17.8	18.7	<17.8
55-Feet Southeast	2-3	8/28/2009	469		0								
85-Feet Northeast	2-3	8/28/2009	800		0								
75-Feet Southwest	2-3	8/28/2009	66		0								

NMOCD 1993 Guideline RRALs	3504	1.0			50	5,000
INMOCD 1993 Guideline RRALs	250*	 1 10	 	~~~	50	5,000
		 				-,

^{*}Chloride RRAL is based on the NMOCD May 28, 2004 Interim Pit and Below-Grade Tank Guidelines

FILE NUMBER

LOCATION

	POD NUM	íBER (WEI	LL NU	JMBER)					OSE FILE NU	MBER(S)				
Z	CAVE	STATE	#4	SB-1							,			
ΑŢĮ	WELL OW	VNER NAM	1E(S)						PHONE (OPTIO	ONAL)				
OC.	MARK	S AND	GΑ	RNER PRO	DUCTION CC	MPANY LT	D							
11	WELL OW	NER MAI	LING	ADDRESS					CITY		STATE		ZIP	
VE.	P.O. B	OX 108	39						HOBBS	OBBS NM 88				
<u> </u>	WEL	,	===		DEGREES	MINUTES	SECO	NDS						
LAI	LOCAT	ſ	1.ÅT	TITUDE	32	51	1	8.00 N	* ACCURACY	REQUIRED: ONE TEN	ITH OF A SEC	COND		
RA.	(FROM	GPS)		NGITUDE	104	4	5	8.00 W	* DATUM REC	QUIRED: WGS 84				
GENERAL AND WELL LOCATION	DESCRIP	TION REI			ON TO STREET ADDR									
1. G					RAL STORE G				N R GO 3	MI FOLLOW G	SPS TO	SITE.		
	(2.5 AC	(RE)		(10 ACRE)	(40 ACRE)	(160 AC)	RE)	SECTION		TOWNSHIP	NORTH	RANGE	EAST	
AL		1/4		1/4	1/4		1/4				SOUTH		west	
Ž	SUBDIVIS	SION NAM	E					LOT NUM	BER	BLOCK NUMBER		UNIT/TRA	CT	
OPTIONAL														
2. C	HYDROGI	RAPHIC SU	JRVE	ΞΥ						MAP NUMBER		TRACT NO	JMBER	
												<u> </u>		
	LICENSE	NUMBER		NAME OF LICE	NSED DRILLER					NAME OF WELL DE	ULLING CON	/PANY		
	WE	1478		EDWARD	BRYAN					STRAUB COI	RPORAT	ION		
	DRILLING)	DRILLING END	ED DEPTH OF CO	MPLETED WELL ((FT)		E DEPTH (FT)	DEPTH WATER FIR				
z	3	2-10		3-2-10		0			20		N/A			
ZEZ						ובו				STATIC WATER LE		MPLETED WELL (FT)		
RM/	COMPLET	ED WELL	IS:	ARTESIAN	DRY HOLI	E SHALL	OW (UNC	ONFINED)			N/A			
DRILLING INFORMATION	DRILLING	FLUID:		✓ AIR	MUD	ADDIT	IVES - SPE	CIFY:						
E II	DRILLING	METHOD): 	✓ ROTARY	HAMMER	CABLE	TOOL	ОТНЕ	R - SPECIFY:					
LIN	DEP	TH (FT)		BORE HOL	E	CASING	=	CONN	NECTION	INSIDE DIA.	CASING	G WALL	SLOT	
RII	FROM	ТО		DIA. (IN)	N	MATERIAL		1	(CASING)	CASING (IN)		ESS (IN)	SIZE (IN)	
3. I	0	20		5		N/A			N/A	N/A	N	/A	N/A	
		<u> </u>												
	DEPT	TH (FT)		THICKNES	S I	ORMATION D	ESCRIP	TION OF P	RINCIPAL W	ATER-BEARING S	TRATA		YIELD	
\TA	FROM	TO		(FT)		(INCLUDE	WATER-	BEARING	CAVITIES OF	R FRACTURE ZON	IES)		(GPM)	
STRATA	~													
G S					·									
RIN														
BEARING						·								
'ATER		l										<u> </u>		
WAT	METHOD (JSED TO E	STIN	MATE YIELD OF V	VATER-BEARING STR	ATA				TOTAL ESTIMATED	WELL YIEL	D (GPM)		
4.								•						
												 		
	FOR OS	E INTER	NAL	USE						WELL RECO	RD & LOG	(Version 6	(9/08)	

POD NUMBER

TRN NUMBER

PAGE 1 OF 2



	POD NUM	BER (WELL)	NUMBER)					OSE FILE NU	MBER(S)					
Z	CAVES	STATE #	44 SB-2											
Ĕ	WELL OW	NER NAME(S)					PHONE (OPTI	ONAL)					
, CC	MARKS	AND G	ARNER PRO	DUCTION CO	MPANY LTD									
, L	WELL OW	NER MAILIN	IG ADDRESS					CITY		STATE		ZIP		
ΈĽ	P.O. BO	OX 1089						HOBBS NM 8				8241		
≯	<u> </u>			DEGREES	LAND THE C	SECO	NIDC .	<u> </u>						
AN	WEL				MINUTES			* ACCUPACY	REQUIRED: ONE TEN	TH OF A SE	COND			
K	LOCAT		ATITUDE	32	51		3.00 N	ĺ	QUIRED: WGS 84		COND			
GENERAL AND WELL LOCATION	(FROM	LC LC	ONGITUDE	104	4	58	3.00 W	DATOMAL						
SE			*	ON TO STREET ADDRE										
	FROM	LOCO F	HILLS GENE	RAL STORE GO	O 6 MI W TO	CR 2	214 TUR	N R GO 3	MI FOLLOW G	SPS TO	SITE.			
	(2.5 AC	DE)	(10 ACRE)	(40 ACRE)	(160 ACRE)		SECTION		TOWNSHIP		RANGE			
. 1	i i						SECTION		10WASIA,	NORTH		☐ EAST		
N N	SUBDIVIS	ION NAME	1/4	1/4	1/4		LOT NUM	DCD	BLOCK NUMBER	SOUTH	UNIT/TR/	WEST VEST		
OPTIONAL	SUBDIVIS	ION NAME					LOI NOM	BER	BLOCK NOWBER		O.VIII III			
90	HVDROGE	RAPHIC SURV	VEV						MAP NUMBER		TRACT N	UMBER		
2.	,bkoor	on me son	, , ,	•					, man wombba					
											(2.1)2/			
	LICENSE 1													
		1478												
	DRILLING		DRILLING END	DED DEPTH OF COM	PLETED WELL (FT)			LE DEPTH (FT)	DEPTH WATER FIR	ST ENCOUN N/A				
NO.		2-10	3-2-10		0			20	OTATIONAL TERMS			T. I. (ETC)		
AT	COMPLET	ED WELL IS:	ARTESIAN	DRY HOLE	✓ SHALLOW	a ince	NEINED)		STATIC WATER LE	VEL IN COM N/A		LL (FI)		
ÄΣ					- SIZAZZOW	(01400				- 1977	· · · · · · · · · · · · · · · · · · ·			
NFC	DRILLING	FLUID:	√ AIR	MUD	ADDITIVE	S – SPE	CIFY:							
DRILLING INFORMATION	DRILLING	METHOD:	✓ ROTARY	HAMMER	CABLE TO	OL	ОТНЕ	R - SPECIFY:		·				
רנוו	DEPT	H (FT)	BORE HOL	E (CASING		CONN	ECTION	INSIDE DIA.	CASING	G WALL	SLOT		
JRII	FROM	ТО	DIA. (IN)	M.	ATERIAL		TYPE	(CASING)	CASING (IN)	THICKN	IESS (IN)	SIZE (IN)		
3.	0	20	5		N/A		I	N/A	N/A	N	I/A	N/A		
					·									
										<u> </u>		<u>l. </u>		
	DEPT	H (FT)	THICKNES	S FO	ORMATION DES	CRIP	TION OF P	RINCIPAL W	ATER-BEARING S	TRATA		YIELD		
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WATER	METHOD U	SED TO EST	MATE YIELD OF V	VATER-BEARING STRA	TA				TOTAL ESTIMATED	WELL YIEL	D (GPM)			
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FOR OSE INTERNAL USE		WELL RECORD & LOG	(Version 6/9/08)
FILE NUMBER	POD NUMBER	TRN NUMBER	
LOCATION			PAGE 1 OF 2

APPENDIX D

ANALYTICAL DATA AND CHAIN OF CUSTODY DOCUMENTATION

Analytical Report 364830

for

Ocotillo Environmental, LLC

Project Manager: Cindy Crain

Marks & Garner Cave State # 4 0110-013C

24-MAR-10





12600 West I-20 East Odessa, Texas 79765

Xenco-Houston (EPA Lab code: TX00122):

Texas (T104704215-TX), Arizona (AZ0738), Arkansas (08-039-0), Connecticut (PH-0102), Florida (E871002) Illinois (002082), Indiana (C-TX-02), Iowa (392), Kansas (E-10380), Kentucky (45), Louisiana (03054) New Hampshire (297408), New Jersey (TX007), New York (11763), Oklahoma (9218), Pennsylvania (68-03610) Rhode Island (LAO00312), USDA (S-44102)

Xenco-Atlanta (EPA Lab Code: GA00046):

Florida (E87429), North Carolina (483), South Carolina (98015), Utah (AALI1), West Virginia (362), Kentucky (85) Louisiana (04176), USDA (P330-07-00105)

Xenco-Miami (EPA Lab code: FL01152): Florida (E86678), Maryland (330)

Xenco-Tampa Mobile (EPA Lab code: FL01212): Florida (E84900)

Xenco-Odessa (EPA Lab code: TX00158): Texas (T104704400-TX)

Xenco-Dallas (EPA Lab code: TX01468): Texas (T104704295-TX)

Xenco-Corpus Christi (EPA Lab code: TX02613): Texas (T104704370)

Xenco-Boca Raton (EPA Lab Code: FL00449):

Florida(E86240), South Carolina(96031001), Louisiana(04154), Georgia(917)

North Carolina(444), Texas(T104704468-TX), Illinois(002295)







Project Manager: Cindy Crain Ocotillo Environmental, LLC

P.O. Box 1816 Hobbs, NM 88241

Reference: XENCO Report No: 364830

Marks & Garner Cave State # 4
Project Address: Eddy County, NM

Cindy Crain:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number 364830. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. Estimation of data uncertainty for this report is found in the quality control section of this report unless otherwise noted. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 364830 will be filed for 60 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

Brent Barron, II

Odessa Laboratory Manager

Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.

Certified and approved by numerous States and Agencies.

A Small Business and Minority Status Company that delivers SERVICE and QUALITY

Houston - Dallas - San Antonio - Austin - Tampa - Miami - Atlanta - Corpus Christi - Latin America



Sample Cross Reference 364830



Ocotillo Environmental, LLC, Hobbs, NM

Marks & Garner Cave State # 4

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
BH-1	S	Mar-02-10 09:20	0 - 1 ft	364830-001
ВН-1	S	Mar-02-10 09:26	5 - 6 ft	364830-002
BH-1	S	Mar-02-10 09:30	10 - 11 ft	364830-003
BH-1	S	Mar-02-10 09:34	15 - 16 ft	364830-004
BH-1	S	Mar-02-10 09:36	20 - 21 ft	364830-005
BH-2	S	Mar-02-10 09:58	0 - 1 ft	364830-006
BH-2	S	Mar-02-10 10:00	5 - 6 ft	364830-007
BH-2	S	Mar-02-10 10:02	10 - 11 ft	364830-008
BH-2	S	Mar-02-10 10:05	15 - 16 ft	364830-009
BH-2	S	Mar-02-10 10:08	20 - 21 ft	364830-010





Client Name: Ocotillo Environmental, LLC Project Name: Marks & Garner Cave State # 4



Project ID:

0110-013C

Work Order Number: 364830

Report Date: 24-MAR-10

Date Received: 03/08/2010

Sample receipt non conformances and Comments:

None

Sample receipt Non Conformances and Comments per Sample:

None

Analytical Non Conformances and Comments:

Batch: LBA-797263 Percent Moisture

None

Batch: LBA-797790 Inorganic Anions by EPA 300

None



Certificate of Analysis Summary 364830

Ocotillo Environmental, LLC, Hobbs, NM

Project Name: Marks & Garner Cave State # 4



Project Id: 0110-013C

Contact: Cindy Crain
Project Location: Eddy County, NM

Date Received in Lab: Mon Mar-08-10 02:53 pm

Report Date: 24-MAR-10

Project Manager: Brent Barron, II

	Lab Id:	364830-0	01	364830-0	02	364830-0	03	364830-0	04	364830-0	05	364830-00	06								
Analysis Daguestad	Field Id:	BH-1		BH-1		BH-1		BH-1		BH-1		BH-1		BH-1		BH-1		BH-1		BH-2	
Analysis Requested	Depth:	0-1 ft		5-6 ft		10-11 ft		15-16 ft		20-21 ft		0-1 ft									
	Matrix:	SOIL		SOIL		SOIL		SOIL		SOIL		SOIL									
	Sampled:	Mar-02-10 (Mar-02-10 09:20		Mar-02-10 09:26		9:30	Mar-02-10 (9:34	Mar-02-10 (9:36	Mar-02-10 09:5									
Anions by E300	Extracted:																				
	Analyzed:	Mar-11-10	21:16	Mar-11-10 2	1:16	Mar-11-10 2	1:16	Mar-11-10	21:16	Mar-11-10	21:16	Mar-11-10 2	1:16								
I	Units/RL:	mg/kg	RL	mg/kg	RL	mg/kg	RL	mg/kg	RL	mg/kg	RL	mg/kg	RL								
Chloride		1580	21.9	4550	47.0	293	18.4	462	22.4	123	4.65	ND	-9.29								

This analytical report, and the entire data package it represents, has been made for your exclusive and confidential use. The interpretations and results expressed throughout this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories assumes no responsibility and makes no warranty to the end use of the data hereby presented. Our liability is limited to the amount invoiced for this work order unless otherwise agreed to in writing.

Since 1990 Houston - Dallas - San Antonio - Austin - Tampa - Miami - Latin America - Atlanta - Corpus Christi

Version: 1.003

Brent Barron, II Odessa Laboratory Manager



Project Id: 0110-013C

Project Location: Eddy County, NM

Certificate of Analysis Summary 364830

Ocotillo Environmental, LLC, Hobbs, NM

Project Name: Marks & Garner Cave State # 4

Date Received in Lab: Mon Mar-08-10 02:53 pm Contact: Cindy Crain

Report Date: 24-MAR-10 Project Manager: Brent Barron, II.

								I Toject Mai	nager.	Dieni Barron,	11		
	Lab Id:	364830-0	01	364830-0)2	364830-0	03	364830-0	04	364830-0	05	364830-00	06
Analysis Requested	Field Id:	BH-1		BH-1		BH-1		BH-1		BH-1		BH-2	
Anutysis Requesteu	Depth:	0-1 ft		5-6 ft		10-11 ft		15-16 ft		20-21 ft		0-1 ft	
,	Matrix:	SOIL		SOIL		SOIL		SOIL		SOIL		SOIL	
	Sampled:	Mar-02-10 (09:20	Mar-02-10 (9:26	Mar-02-10 (9:30	Mar-02-10 (09:34	Mar-02-10 (9:36	Mar-02-10 0	9:58
Percent Moisture	Extracted:												
	Analyzed:	Mar-09-10	17:00	Mar-09-10 1	7:00	Mar-09-10 1	7:00	Mar-09-10	17:00	Mar-09-10	7:00	Маг-09-10 1	7:00
	Units/RL:	%	RL	%	RL	%	RL	%	RL	%	RL	%	RL
Percent Moisture		4.02	1.00	10.6	1.00	8.79	1.00	6.44	1.00	9.63	1.00	9.59	1.00

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Brent Barron, II Odessa Laboratory Manager



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Ocotillo Environmental, LLC, Hobbs, NM



Date Received in Lab: Mon Mar-08-10 02:53 pm

Report Date: 24-MAR-10

Project Manager: Brent Barron, II

					Troject Manager.	
	Lab Id:	364830-007	364830-008	364830-009	364830-010	
Analysis Requested	Field Id:	BH-2	BH-2	BH-2	BH-2	
Analysis Requesieu	Depth:	5-6 ft	10-11 ft	15-16 ft	20-21 ft	
	Matrix:	SOIL	SOIL	SOIL	SOIL	
	Sampled:	Mar-02-10 10:00	Mar-02-10 10:02	Mar-02-10 10:05	Mar-02-10 10:08	-
Anions by E300	Extracted:					
	Analyzed:	Mar-11-10 21:16	Mar-11-10 21:16	Mar-11-10 21:16	Mar-11-10 21:16	
	Units/RL:	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	
Chloride	-	262 22.3	119 18.4	68.6 21.8	65.0 9.20	

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Brent Barron, II Odessa Laboratory Manager

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Project Id: 0110-013C

Project Location: Eddy County, NM

Contact: Cindy Crain

Certificate of Analysis Summary 364830

Ocotillo Environmental, LLC, Hobbs, NM

Project Name: Marks & Garner Cave State # 4

Date Received in Lab: Mon Mar-08-10 02:53 pm

Report Date: 24-MAR-10

oject Location. Eddy County, Nivi						_		Project Mar	nager:	Brent Barron, Il	I	
	Lab Id:	364830-00)7	364830-0	08	364830-0	09	364830-0	10	1		
Analysis Bagyastad	Field Id:	BH-2		BH-2		BH-2		BH-2				
Analysis Requested	Depth:	5-6 ft		10-11 fi		15-16 f	t	20-21 f	t			
	Matrix:	SOIL		SOIL		SOIL	:	SOIL				
	Sampled:	Mar-02-10 1	0:00	Mar-02-10 1	0:02	Mar-02-10 1	10:05	Mar-02-10	10:08			
Percent Moisture	Extracted:											
	Analyzed:	Mar-09-10 1	7:00	Mar-09-10 1	7:00	Mar-09-10 1	17:00	Mar-09-10	17:00			
	Units/RL:	%	RL	%	RL	%	RL	%	RL			
Percent Moisture		5.90	1.00	8.59	1.00	3.74	1.00	8.67	1.00			

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Flagging Criteria



- X In our quality control review of the data a QC deficiency was observed and flagged as noted. MS/MSD recoveries were found to be outside of the laboratory control limits due to possible matrix /chemical interference, or a concentration of target analyte high enough to effect the recovery of the spike concentration. This condition could also effect the relative percent difference in the MS/MSD.
- **B** A target analyte or common laboratory contaminant was identified in the method blank. Its presence indicates possible field or laboratory contamination.
- **D** The sample(s) were diluted due to targets detected over the highest point of the calibration curve, or due to matrix interference. Dilution factors are included in the final results. The result is from a diluted sample.
- E The data exceeds the upper calibration limit; therefore, the concentration is reported as estimated.
- F RPD exceeded lab control limits.
- J The target analyte was positively identified below the MQL and above the SQL.
- U Analyte was not detected.
- L The LCS data for this analytical batch was reported below the laboratory control limits for this analyte. The department supervisor and QA Director reviewed data. The samples were either reanalyzed or flagged as estimated concentrations.
- H The LCS data for this analytical batch was reported above the laboratory control limits. Supporting QC Data were reviewed by the Department Supervisor and QA Director. Data were determined to be valid for reporting.
- K Sample analyzed outside of recommended hold time.
- JN A combination of the "N" and the "J" qualifier. The analysis indicates that the analyte is "tentatively identified" and the associated numerical value may not be consistent with the amount actually present in the environmental sample.

BRL Below Reporting Limit.

RL Reporting Limit

* Outside XENCO's scope of NELAC Accreditation.

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Blank Spike Recovery



Project Name: Marks & Garner Cave State # 4

Work Order #: 364830

Project ID:

0110-013C

Lab Batch #: 797790

Sample: 797790-1-BKS

ND

Matrix: Solid

Date Analyzed: 03/11/2010

Anions by E300

Analytes

Date Prepared: 03/11/2010

Analyst: LATCOR

Reporting Units: mg/kg

Chloride

#: 1	BLANK /	BLANK SP	KE REC	COVERY	STUDY
Blank Result [A]	Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Control Limits %R	Flags
ND	12.0	12.3	103	75-125	

Blank Spike Recovery [D] = 100*[C]/[B]All results are based on MDL and validated for QC purposes. **BRL** - Below Reporting Limit

Version: 1.003

Final Ver. 1.000

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Form 3 - MS Recoveries

Project Name: Marks & Garner Cave State # 4



Work Order #: 364830

Lab Batch #: 797790

QC-Sample ID: 364718-002 S

Project ID: 0110-013C

Date Analyzed: 03/11/2010

Date Prepared: 03/11/2010

Analyst: LATCOR

Reporting Units: mg/kg

Batch #: 1 Matrix: Soil

MATRIX / MATRIX SPIKE DECOVERY STIDY

Reporting Units: mg/kg	MATI	CIX / MA	TRIX SPIKE	RECO	VERY STU	DY
Inorganic Anions by EPA 300	Parent Sample Result	Spike Added	Spiked Sample Result [C]	%R [D]	Control Limits %R	Flag
Analytes	[A]	[B]				
Chloride	4.83	126	129	99	75-125	

Matrix Spike Percent Recovery [D] = 100*(C-A)/B Relative Percent Difference [E] = 200*(C-A)/(C+B) All Results are based on MDL and Validated for QC Purposes

BRL - Below Reporting Limit

Version: 1.003



Sample Duplicate Recovery



Project Name: Marks & Garner Cave State # 4

Work Order #: 364830

Lab Batch #: 797790

Project ID: 0110-013C

Date Prepared: 03/11/2010 **Date Analyzed:** 03/11/2010

Analyst: LATCOR

QC-Sample ID: 364718-002 D

Batch #: Matrix: Soil

Reporting Units: mg/kg	SAMPLE / SAMPLE DUPLICATE RECOVERY

Anions by E300 Analyte	Parent Sample Result [A]	Sample Duplicate Result [B]	RPD	Control Limits %RPD	Flag
Chloride	4.83	ND	NC	20	

Spike Relative Difference RPD 200 * | (B-A)/(B+A) | All Results are based on MDL and validated for QC purposes. BRL - Below Reporting Limit

Version: 1.003

Final Ver. 1.000 Page 12 of 14

Environmental Lab of Texas

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

12600 West I-20 East Odessa, Texas 79765 Phone: 432-563-1800 Fax: 432-563-1713

	Project Manager:	Cindy Crain			<u> </u>												Pro	ject	Nan	ne: _	Ma	<u>∕k</u> ≤	, 4	Ga	me	<u>ر </u>	ave	5	tate	<u>. #.</u>	<u> </u>
	Company Name	Ocotillo Environmental, LL	c															Pro	ojeci	t 孝: _		01	10 -	0	13	<u>C</u>					-
	Company Address	PO Box 1816														•	F	roje	ct L	oc:_		Ed	Ыų	C	٠	N	M				
	City/State/Zip:	Hobbs, NM 88241	·····									_							PO	学;_											
	Telephone No:	(575) 441-7244				Fax No:		(43	2) 2	272-0	304					Re	port	For	mat:	:	X s	tand	lard			TRI	RP		D N	IPDE	 s
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										Prese	rvati	on & I	of Co	intalne	3	Ma	y Other	N 80159	1X 1008	Q	Alkalinity)	Cr Ph Ho Se			BTEX 8280					duje) 24, 48,	
	FIE	LD CODE	Beginning Depth	Ending Depth	Date Sampled	Time Sampled	Field Filtered	Total #. of Containers	8	HNO ₃	ΗĊ	H,SO,	NaOH	None	Other (Specify)	DW-Drinking Water St. et	Walton-Potable Specific	418.1 801	- 1	Cettons (Ca, Mg, Na,	Antons (C) 804, Alba	Metals: As Ao Ba Cd Cr Ph Ho	Votatibes	Semivolatiles	BTEX 80218/5030 or BTEX 8260	RCI	N.O.R.M.			RUSH TAT (Pre-Schedule)	Standard TAT
or.	BH-1		0		3/2/10	0920	-	1	Г				+	1	Н	2			7	٦		1	ť	۳		۲			十	十	100 1-
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Special i	instructions:																					Ne s									7
Relinquis		Date 3/a/		me	Received by:									T	Da	te	Γ	Time							metak Metak						
Relinquis	ned by	3/8/10 Date	<i>14</i> :	me	Received by:									+	Da	le	-	Time													
Relinquis	hed by:	Date	TII	me				ń							e e	e In				941							f				

Environmental Lab of Texas Variance/ Corrective Action Report- Sample Log-In

Client	Ocofil	lo É	NV			•		
Date/ Time:	3.8	3.10	14:53					
Lab ID#:			4830				-	
Initials:			AL					
iniueis.			1110				1	
			Sample Receipt	Checidist		· ·		
#1 Tempar	ature of conta	ained coc	ler?	Yes	No	1 7.1 °C	Rent Initia	
	g container in			(Vice)	No		- - il	7
			ing container/ cooler?	Yes	No	Not Present		7
			le botiles/ container?	Yes	No	Not Present		7
#5 Chain c	of Custody pre	sent?		(Yes)	No		il]
#6 Sample	instructions	complete	of Chain of Custody?	Yes	No			_
			relinquished/received?	Yes	No		<u> </u>	4
			eample label(s)?	Yes	No	10 written on Contaile		_
	ner label(s) le			Yes	No	Not Applicable		4
THE R. P. LEWIS CO., LANSING, MICH.			ree with Chain of Custody?	(Tex)	No			_
	ners supplied	حـــــــــــــــــــــــــــــــــــــ		(CO)	No			4
	es in proper ((166)	No	See Below		_
	es property p		?	Yes	No	See Below		4
	e bottles inte	The second secon	o Obein of Oueland		No			_
التهيبات المسيرات والمسيدان			n Chain of Custody?	(198)	No			_
The second secon	The state of the last of the l	والمري ومعطونات عثورا	Chain of Custody?	0	No			_
	the same of the sa	والمرابع المرابع المرابع	indicated test(s)? ufficient hold time?	(Xear)	No	See Below		_
	intract of sam	بكنت والمراجع	unast fou and?	Yes	No	See Balow		\dashv
	samples have	the same of the last of the la	dopace?	Yes	No No	Not Applicable Not Applicable		Н
MEG ACC	SELIE SESTIMAN	2510 1156	J055001	1 148	1 140	Not Applicable		IJ
Contact			Variance Docu	mentation		Date/ Time:		
Regarding:	***							<u> </u>
Corrective /	Action Taken:							
							·	1
Check all ti	nat Apply:		See attached e-mail/ fax Client understands and wor Cooling process had begun					