

32015-26294

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
#ICLB0534949059, South Culebra Bluff (SCB) 23 No. 005

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. A sample was collected from the floor area of the spill site which was northeast of the wellhead. This 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 below detection limits. The Chloride content was 4340 mg/Kg wet weight. When converted to dry weight bases the results are 3577 mg/Kg. A background sample was not collected of the caliche material used to construct the well location but this sample result is not considered elevated for the area.

Please review the attached results and notify me via letter or email that this issue is closed in relation to the spill area. The cellar area is also included in this NOV and is being closed under a separate work plan.

Please contact me if you have any questions.

COMPLIANCE CLOSED
@ 4/10/06

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Swindle', with a stylized, cursive script.

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 #: 06-03-130
Date: 04/06/06 09:46
Work ID: FLOOR COMPOSITE
Date Received: 03/31/06
Date Completed: 04/06/06


Purchase Order: RANGE SCB23 #5
Invoice Number:

Client Code: WHITE_BUFF

SAMPLE IDENTIFICATION

<u>Sample Number</u>	<u>Sample Description</u>
01	FLOOR COMPOSITE

<u>Sample Number</u>	<u>Sample Description</u>
--------------------------	-------------------------------



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.

Analytical Services Kwik!

Order # 06-03-130
04/06/06 09:46

ASK LABORATORIES, INC.

Page 2

TEST RESULTS BY SAMPLE

Sample: 01A FLOOR COMPOSITE

Collected: 03/29/06 09:40

<u>Test Description</u>	<u>Result</u>	<u>SQL</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
PERCENT SOLIDS - DRY WT.	82.42		wt % solids	03/31/06	BJP
CHLORIDE ON SOLIDS	4340	100	mg/kg	03/31/06	BNH
Total Pet. Hydrocarbons					
TPH C6-C12 - GRO	<36.9	36.9	mg/kg	04/05/06	BNH
TPH C12-C28 - DRO	<36.9	36.9	mg/kg	04/05/06	BNH
TPH C28-C35	<36.9	36.9	mg/kg	04/05/06	BNH
BTEX					
BENZENE	<0.014	0.014	mg/kg	04/03/06	KDJ
TOLUENE	<0.014	0.014	mg/kg	04/03/06	KDJ
ETHYLBENZENE	<0.014	0.014	mg/kg	04/03/06	KDJ
XYLENE	<0.014	0.014	mg/kg	04/03/06	KDJ
Surrogates					
BROMOFLUOROBENZENE	113	Min: 80		Max: 120	

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

ASK Laboratories, Inc.

Analytical Services Kwik!

Order # 06-03-130
04/06/06 09:46

ASK LABORATORIES, INC.

Page 3

QA/QC INFORMATION

	LCS	MS	MSD	RPD	BLANK
MTBE	100%	107%	106%	0.4%	bd1
BENZENE	99%	95%	93%	1.6%	bd1
TOLUENE	96%	90%	91%	1.1%	bd1
ETHYLBENZENE	99%	95%	96%	1.0%	bd1
o-XYLENE	100%	93%	94%	0.8%	bd1
m,p-XYLENES	100%	97%	97%	0.0%	bd1
METHOD 8015	LCS	MS	MSD	RPD	BLANK
TPH	95%	94%	92%	2.3%	bd1
COMPOUND	RPD	SPIKE RECOVERY	QC RECOVERY	BLANK	
CHLORIDE	0.9%	91%	94%	bd1	

bd1 = below detectable levels

TEST METHODOLOGIES

TEST CODE : SOLIDS TEST NAME : PERCENT SOLIDS FOR DRY WT CORRECTIONS
REFERENCE CLP PROTOCOL/ SECTION IV/ PART F

TEST CODE : 8015N TEST NAME : TRPH-8015M (GRO, DRO, C28-35)
METHOD 8015M GCFID GAS CHROMATOGRAPHY WITH FLAME-
IONIZATION DETECTOR. SW-846 TEST METHODS FOR
EVALUATING SOLID WASTES.

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

TEST CODE : CL_SOL TEST NAME : CHLORIDE ON SOLID
METHOD 300.0 : ION CHROMATOGRAPHY
METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES,
METHOD 9056 ION CHROMATOGRAPHY
SW-846 TEST METHODS FOR EVALUATING SOLID WASTES.

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

Please Note: Liability and Damages. ASK Laboratories, Inc. 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 analysis. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by ASK Laboratories, Inc. within thirty days of the applicable service. In no event shall ASK Laboratories, Inc. be liable for incidental or consequential damages, including those without limitation, business interruption, 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, Inc. regardless of whether such claim is based upon any of the preceding stated reasons or otherwise.

ASK Laboratories

Analytical Services Kwik!

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./Lab # SCB 23 #5

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
01	3/29/06	9:40A	soil	X		Floor composite	1	X	glass
02								X	
03								X	
04								X	
05								X	
06								X	
07								X	
08								X	
09								X	
10								X	

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	16:30P	BUS
Relinquished by: (Signature)	Date	Time	Received by: (Signature)
<i>[Signature]</i>	3-31	0100	AM

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

Comments

White Buffalo Environmental Services, Inc.

5425 Ben Ficklin Road San Angelo, Texas 76904

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

Client (Name):		Range		Project (Name):		South Culebra Bluff 23 #5								
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	TCLP	RCRA Metals	TDS	PAH	CHLORIDES
06-	3/29	9:40	X		Floor composite	1	glass	X	X					X
06-														
06-														
06-														
06-														
06-														
06-														
06-														
06-														
06-														
06-														
06-														
Sampled By:		Date:		Time:		Temp.		Witnessed By:		Date:		Time:		
Signature: <i>[Signature]</i>		3/29/06		9:40 A				Signature: <i>[Signature]</i>						
Relinquished By:		Date:		Time:		Temp.		Received By:		Date:		Time:		
Signature: <i>[Signature]</i>		3/30/06		8:00 A				Signature: <i>[Signature]</i>		3/30/06		8:00 A		
Relinquished By:		Date:		Time:		Temp.		Received for Laboratory By:		Date:		Time:		
Signature: <i>[Signature]</i>		3/30/06						Signature: <i>[Signature]</i>		3/30/06				