30-015-35865

J. C. WILLIAMSON

ROSS DRAW #28

ALTERNATIVE CLOSURE PLAN – WASTE EXCAVATION AND REMOVAL

Protocols and Procedures, Sampling, Disposal, Soil Backfill and Site Reclamation

The original closure plan at the J. C. Williamson, Ross Draw #28 reserve drilling pit was to close on site, by trench burial methods. Depth to groundwater at the site is approximately 190 feet, and the surface is owned by the State of New Mexico.

A soil sample was collected on January 7, 2009 of the pit contents (Waste) and submitted to Cardinal Laboratories at Hobbs, New Mexico for analysis of chloride by EPA method 300.1 and SPLP method 1312 for chlorides. A duplicate sample (Mixed Waste) of the pit contents was mixed with clean soil (3:1 ratio) and also submitted to Cardinal for chloride analysis.

Laboratory results are attached, reporting a chloride concentration of the pit contents at 83,100 mg/kg and of the mixed waste at 19,400 mg/kg. The SPLP analysis of the pit contents reported a chloride concentration of 4,020 mg/L, and the SPLP analysis of the mixed waste reported a chloride concentration of 1,230 mg/L.

As the chloride concentrations exceed the New Mexico Oil Conservation Division standards for on-site burial, the pit liner and all contents of the reserve drilling pit will be removed from the site to Controlled Recovery Inc. (CRI), Permit # NM-01-0006, located west of Hobbs, New Mexico.

A five-point composite sample will be collected from below the pit liner and submitted to an NMOCD approved laboratory for analysis of BTEX, TPH, chlorides. Upon receipt of laboratory confirmation from the soil sample that benzene is less than 0.2 mg/kg, total BTEX is less than 50 mg/kg, TPH is less than 2500 mg/kg, GRO and DRO is less than 500 mg/kg, and chloride is less than 1000 mg/kg, the reserve drilling pit will be backfilled with stockpiled soil removed during construction of the drilling pit.

The reserve drilling pit will be backfilled with clean soil to a depth of approximately one (1) foot below ground surface and compacted. One (1) foot of topsoil will be placed above the compacted soil and contoured to surface grade. The entire area will be re-seeded with a native grass seed mixture.

A final report will be submitted to the NMOCD within 60 days of completion of closure activities.

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Tuesday, January 13, 2009 8:39 AM
To: 'Cindy Crain'
Cc: mj-cmb@leaco.net
Subject: RE: J.C. Williamson, Ross Draw #28 - Alternative Closure Plan

Cindy,

Thank you. The alternative closure plan is approved. Please notify the NMOCD District 2 Office 48 hours prior to commencement of closure activities and 48 prior to obtaining samples where analyses of samples obtained are to be submitted to the NMOCD.

Mike Bratcher

From: Cindy Crain [mailto:cindy.crain@gmail.com]
Sent: Monday, January 12, 2009 3:52 PM
To: Bratcher, Mike, EMNRD
Cc: mj-cmb@leaco.net
Subject: J.C. Williamson, Ross Draw #28 - Alternative Closure Plan

Mike,

Attached please find the alternative closure plan (Excavation and Disposal) for the J.C. Williamson Ross Draw #28 site.
Analytical documentation from the January 7, 2009 sampling event is also attached.

If you have any questions, please give me a call.

Thank you,

--
Cindy Crain
Environmental Manager

Ocotillo Environmental
2125 French Drive
Hobbs, NM 88240

Office (575) 393-6371
Cell (575) 441-7244
Fax (432) 272-0304

Analytical Report 321934

for

Ocotillo Environmental, LLC

Project Manager: Cindy Crain

J.C. Williamson Ross Draw # 28

1007-003R

10-JAN-09

12600 West I-20 East Odessa, Texas 79765

Texas certification numbers:
Houston, TX T104704215-08B-TX - Odessa/Midland, TX T104704400-08-TX

Florida certification numbers:
Houston, TX E871002 - Miami, FL E86678 - Tampa, FL E86675
Norcross(Atlanta), GA E87429

South Carolina certification numbers:
Norcross(Atlanta), GA 98015

North Carolina certification numbers:
Norcross(Atlanta), GA 483

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

10-JAN-09

Project Manager: **Cindy Crain**
Ocotillo Environmental, LLC
P.O. Box 1816
Hobbs, NM 88241

Reference: XENCO Report No: **321934**
J.C. Williamson Ross Draw # 28
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 321934. 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. 321934 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

Sample Cross Reference 321934

Ocotillo Environmental, LLC, Hobbs, NM

J.C. Williamson Ross Draw # 28

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
Waste	S	Jan-07-09 13:20		321934-001
Mixed Waste	S	Jan-07-09 13:35		321934-002

Certificate of Analysis Summary 321934

Ocotillo Environmental, LLC, Hobbs, NM

Project Name: J.C. Williamson Ross Draw # 28

Project Id: 1007-003R
Contact: Cindy Crain
Project Location: Eddy County, NM

Date Received in Lab: Thu Jan-08-09 11.23 am
Report Date: 10-JAN-09
Project Manager: Brent Barron, II

Analysis Requested													
	Lab Id:	321934-001		321934-002									
	Field Id:	Waste		Mixed Waste									
	Depth:												
	Matrix:	SOIL		SOIL									
	Sampled:	Jan-07-09 13 20		Jan-07-09 13 35									
SPLP Anions by EPA 1312 / 300	*Extracted:*												
	Analyzed:	Jan-09-09 10.53		Jan-09-09 11 31									
	Units/RL:	mg/L	RL	mg/L	RL								
Chloride		4020	50.0	1230	25 0								

Brent Barron
Odessa Laboratory Director

Certificate of Analysis Summary 321934

Ocotillo Environmental, LLC, Hobbs, NM

Project Name: J.C. Williamson Ross Draw # 28

Project Id: 1007-003R
Contact: Cindy Crain
Project Location: Eddy County, NM

Date Received in Lab: Thu Jan-08-09 11:23 am
Report Date: 10-JAN-09
Project Manager: Brent Barron, II

Analysis Requested								
	Lab Id:	321934-001		321934-002				
	Field Id:	Waste		Mixed Waste				
	Depth:							
	Matrix:	SOIL		SOIL				
	Sampled:	Jan-07-09 13.20		Jan-07-09 13·35				
Anions by EPA 300	*Extracted:*							
	Analyzed:	Jan-08-09 20 00		Jan-08-09 20 00				
	Units/RL:	mg/kg	RL	mg/kg	RL			
Chloride		83100	6670	19400	1040			
Percent Moisture	*Extracted:*							
	Analyzed:	Jan-08-09 17·00		Jan-08-09 17 00				
	Units/RL:	%	RL	%	RL			
Percent Moisture		25 04	1 00	4 18	1.00			

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

Brent Barron
Odessa Laboratory Director

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.

* Outside XENCO's scope of NELAC Accreditation.

Blank Spike Recovery

Project Name: J.C. Williamson Ross Draw # 28

Work Order #: 321934 **Project ID:** 1007-003R

Lab Batch #: 745938 **Sample:** 745938-1-BKS **Matrix:** Solid
Date Analyzed: 01/08/2009 **Date Prepared:** 01/08/2009 **Analyst:** LATCOR
Reporting Units: mg/kg **Batch #:** 1

Anions by EPA 300 / Analytes	Blank Result [A]	Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Control Limits %R	Flags
	BLANK /BLANK SPIKE RECOVERY STUDY					
Chloride	ND	10 0	8 87	89	80-120	

Lab Batch #: 746064 **Sample:** 746064-1-BKS **Matrix:** Water
Date Analyzed: 01/09/2009 **Date Prepared:** 01/09/2009 **Analyst:** LATCOR
Reporting Units: mg/L **Batch #:** 1

SPLP Anions by EPA 1312 / 300 / Analytes	Blank Result [A]	Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Control Limits %R	Flags
	BLANK /BLANK SPIKE RECOVERY STUDY					
Chloride	ND	10.0	10.6	106	90-110	

Blank Spike Recovery [D] = 100*[C]/[B]
All results are based on MDL and validated for QC purposes

Form 3 - MS Recoveries

Project Name: J.C. Williamson Ross Draw # 28

Work Order #: 321934

Lab Batch #: 745938 **Project ID:** 1007-003R

Date Analyzed: 01/08/2009 **Date Prepared:** 01/08/2009 **Analyst:** LATCOR

QC- Sample ID: 321934-002 S **Batch #:** 1 **Matrix:** Soil

Reporting Units: mg/kg

Inorganic Anions by EPA 300	MATRIX / MATRIX SPIKE RECOVERY STUDY					
Analytes	Parent Sample Result [A]	Spike Added [B]	Spiked Sample Result [C]	%R [D]	Control Limits %R	Flag
Chloride	19400	20900	42400	110	80-120	

Lab Batch #: 746064

Date Analyzed: 01/09/2009 **Date Prepared:** 01/09/2009 **Analyst:** LATCOR

QC- Sample ID: 321934-001 S **Batch #:** 1 **Matrix:** Soil

Reporting Units: mg/L

Inorganic Anions by EPA 300	MATRIX / MATRIX SPIKE RECOVERY STUDY					
Analytes	Parent Sample Result [A]	Spike Added [B]	Spiked Sample Result [C]	%R [D]	Control Limits %R	Flag
Chloride	4020	1000	4960	94	80-120	

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

Sample Duplicate Recovery

Project Name: J.C. Williamson Ross Draw # 28

Work Order #: 321934

Lab Batch #: 745938 **Project ID:** 1007-003R
Date Analyzed: 01/08/2009 **Date Prepared:** 01/08/2009 **Analyst:** LATCOR
QC- Sample ID: 321934-002 D **Batch #:** 1 **Matrix:** Soil
Reporting Units: mg/kg

Anions by EPA 300 Analyte	Parent Sample Result [A]	Sample Duplicate Result [B]	RPD	Control Limits %RPD	Flag
	SAMPLE / SAMPLE DUPLICATE RECOVERY				
Chloride	19400	19400	5	20	

Lab Batch #: 745944
Date Analyzed: 01/08/2009 **Date Prepared:** 01/08/2009 **Analyst:** BEV
QC- Sample ID: 321922-001 D **Batch #:** 1 **Matrix:** Soil
Reporting Units: %

Percent Moisture Analyte	Parent Sample Result [A]	Sample Duplicate Result [B]	RPD	Control Limits %RPD	Flag
	SAMPLE / SAMPLE DUPLICATE RECOVERY				
Percent Moisture	1.45	1.81	22	20	F

Lab Batch #: 746064
Date Analyzed: 01/09/2009 **Date Prepared:** 01/09/2009 **Analyst:** LATCOR
QC- Sample ID: 321934-001 D **Batch #:** 1 **Matrix:** Soil
Reporting Units: mg/L

SPLP Anions by EPA 1312 / 300 Analyte	Parent Sample Result [A]	Sample Duplicate Result [B]	RPD	Control Limits %RPD	Flag
	SAMPLE / SAMPLE DUPLICATE RECOVERY				
Chloride	4020	4000	0	20	

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

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
Company Name: Ocotillo Environmental, LLC
Company Address: PO Box 1818
City/State/Zip: Hobbs, NM 88241
Telephone No: (575) 441-7244 Fax No: (432) 272-0304
Sampler Signature: Cindy Crain e-mail:

Project Name: JC Williamson Ross Draw #28
Project #: 1007-003R
Project Loc: Eddy, Co, NM
PO #:
Report Format: ☑ Standard ☐ TRRP ☐ NPDES

(lab use only)
ORDER #: 321134

LAB # (lab use only)	FIELD CODE	Beginning Depth	Ending Depth	Date Sampled	Time Sampled	Field Filtered	Total # of Containers	Preservation & # of Containers: Ice	HNO3	HCl	H2SO4	NaOH	Na2S2O3	None	Other (Specify)	Matrix: GW=Groundwater SL=Sludge SW=Surface Water S=Soil/Solid NP=Non Potable Specify Other	Analyze For: TPH 418.1	TPH 8015M	TPH TX 1005	Cations (Ca, Mg, Na, K)	Anions (Cl, SO4, Alkalinity)	SAR / ESP / CEC	Metals As Ag Ba Cd Cr Pb Hg Se	Volatiles	Semivolatiles	BTEX 8021B/5030 or BTEX 8260	RCI	N O R M	TCLP: SPLP Chloride (1312)	RUSH TAT (Pre-Schedule) 24, 48, 72 hrs	Standard TAT
01	Waste	-	-	1/7/09	1320		2							✓		S				✓								✓	X	
02	Mixed Waste	-	-	1/7/09	1335		2							✓		S				✓								✓	X	

Special Instructions:
24 Hr. Rush

Relinquished by	Date	Time	Received by	Date	Time
Cindy Crain	1/8/09	1:23			
Relinquished by	Date	Time	Received by	Date	Time
Relinquished by	Date	Time	Received by ELOT: Andrea Sosa	1/8/09	11:23

Laboratory Comments:
Sample Containers Intact? (Y) N
VOCs Free of Headspace? Y N (NA)
Labels on container(s) On Lid Y (N) NA
Custody seals on container(s) Y N (NA)
Custody seals on cooler(s) Y N (NA)
Sample Hand Delivered by Sampler/Client Rep ? (Y) N
by Courier? UPS DHL FedEx Lone Star
Temperature Upon Receipt: 15.5 °C

Environmental Lab of Texas

Variance/ Corrective Action Report- Sample Log-In

Client: Ocotillo

Date/ Time: 1.09 11:23

Lab ID #: 321134

Initials: GL

Sample Receipt Checklist

					Client Initials
#1	Temperature of container/ cooler?	Yes	No	15.5 °C	
#2	Shipping container in good condition?	Yes	No		
#3	Custody Seals intact on shipping container/ cooler?	Yes	No	< Not Present >	
#4	Custody Seals intact on sample bottles/ container?	Yes	No	Not Present	
#5	Chain of Custody present?	Yes	No		
#6	Sample instructions complete of Chain of Custody?	Yes	No		
#7	Chain of Custody signed when relinquished/ received?	Yes	No		
#8	Chain of Custody agrees with sample label(s)?	Yes	No	ID written on Cont / Lid	
#9	Container label(s) legible and intact?	Yes	No	Not Applicable	
#10	Sample matrix/ properties agree with Chain of Custody?	Yes	No		
#11	Containers supplied by ELOT?	Yes	No		
#12	Samples in proper container/ bottle?	Yes	No	See Below	
#13	Samples properly preserved?	Yes	No	See Below	
#14	Sample bottles intact?	Yes	No		
#15	Preservations documented on Chain of Custody?	Yes	No		
#16	Containers documented on Chain of Custody?	Yes	No		
#17	Sufficient sample amount for indicated test(s)?	Yes	No	See Below	
#18	All samples received within sufficient hold time?	Yes	No	See Below	
#19	Subcontract of sample(s)?	Yes	No	Not Applicable	
#20	VOC samples have zero headspace?	Yes	No	Not Applicable	

Variance Documentation

Contact: _____ Contacted by: _____ Date/ Time: _____

Regarding: _____

Corrective Action Taken: _____

Check all that Apply

- ☐ See attached e-mail/ fax
- ☐ Client understands and would like to proceed with analysis
- ☐ Cooling process had begun shortly after sampling event