Highlander Environmental Corp.

Midland, Texas

January 10, 2005

Mr. Larry Johnson
Environmental Engineer Specialist
Oil Conservation Division- District I
1625 N. French Drive
Hobbs, New Mexico 88240

RE: Assessment and Closure Report for the Pogo Producing Company, M.K. Stewart Tank Battery Located in Section 28, Township 23 South, Range 36 East, Unit Letter N, Lea County, New Mexico.

Dear Mr. Johnson:

Highlander Environmental Corp. (Highlander) was contacted by Pogo Producing Company (Pogo) to assess a spill on the M.K. Stewart Tank Battery, located in Unit Letter N, Section 28, Township 23 South, Range 36 East, Lea County, New Mexico (Site). The State of New Mexico C-141 (Initial) is shown in Appendix C. The Site is shown on Figure 1.

On February 6, 2005, a spill occurred at this facility, when a leak developed in the fire tube of the heater treater. According to the C-141, approximately 80 barrels of crude oil and produced water was spilled 30 barrels of fluid were recovered.

Groundwater and Regulatory

According to published data from "Geology and Groundwater Resources of Lea County, New Mexico", dated 1952, four water wells are located in Sections 15, 16, 22 and 23 with reported depths to water ranging from 144' to 189'. Additional wells in Sections 35 and 36 had reported water levels of 120 to 124'. Five wells were located in the USGS database with reported depths to water ranging from 120' to 180'. The New Mexico State Engineer Office database reports 10 well in T-23-S, R-36-E with average depths to water ranging from 127' to 400'. The well records are enclosed in Appendix A.

A risk-based evaluation was performed for the Site in accordance with the New Mexico Oil Conservation Division (NMOCD) Guidelines for Remediation of Leaks, Spills and Releases, dated August 13, 1993. The guidelines require a risk-based evaluation of the site to determine

Pogo - 1789 Incident - nPAC0603840429
Facility - fPAC0603840286 Application - pPAC0603840724

1910 N. Big Spring • Midland, Texas 79705 • (432) 682-4559 • Fax (432) 682-3946

recommended remedial action levels (RRAL) for benzene, toluene, ethylbenzene and xylene (collectively referred to as BTEX) and total petroleum hydrocarbons (TPH) in soil. The proposed RRAL for benzene was determined to be 10 parts per million (ppm) or milligrams per kilogram (mg/kg) and 50 ppm for total BTEX (sum of benzene, toluene, ethylbenzene and xylene). Based on the regional groundwater data, the proposed RRAL for TPH is 5,000 mg/kg.

Site Assessment and Corrective Action

WHERE - NEED TO CLARIFY SY

On February 9, 2005, Highlander personnel inspected the spill area. Much of the spill remained inside the facility dike, however, some fluid breached the north dike wall and flowed out into the pasture, north of the facility. The spill area is shown on Figure 2. As it was raining at the time of inspection, it was decided to address the impact in the pasture first. Approximately 1.5' of impacted soil was removed from the spill area and taken to disposal. In the pasture, a total of three (3) hand augers (AH-1, AH-2 and AH-3) were installed in the excavated spill area to assess and define the vertical extent of the impact. The site was re-inspected on February 14, 2005. A total of three (3) auger holes (AH-4, AH-5 and AH-6) were installed to assess the spill inside the dike.

Soil samples from all auger holes were evaluated for Total Petroleum Hydrocarbon (TPH) by EPA 418.1, Benzene, Toluene, Ethylbenzene and Xylene (BTEX) by method SW 846-8020 and chloride by method SW846-9252. The spill area and augerhole locations are shown on Figure 2. The results are summarized in Table 1.

Referring to Table 1, the TPH and BTEX were all below the RRAL for the auger holes (AH-1, AH-2 and AH-3) installed north of the facility. However, the chloride concentrations in the area of AH-2 were elevated. Inside the facility firewall, the TPH and BTEX concentration exceeded the RRAL for the 0-1.0' sample from AH-5. The deeper sample at 1.0'-1.5' showed TPH and BTEX concentrations below the RRAL. Elevated chloride concentrations were also detected at 0-1' and 1.0'-1.5' below surface in the samples from AH-4.

Based upon the results, additional excavation was performed on April 6, 2005, in the vicinity of AH-2, AH-4, and AH-5. After excavating 1.0' of impacted soil in the vicinity of AH-4 additional samples were collected at 2-2.5' and 3-3.5' below excavation bottom (BEB) to delineate the chloride impact. The results showed chloride concentrations decreasing well below 250 mg/kg at 3.0' BEB in AH-4. In the area of AH-2, an additional 1.0' of soil was removed. A composite sample was collected at 2.0' below surface. The composite sample from the vicinity of AH-2 remained elevated.

On October 25, 2005, an additional 2.0' of soil was removed from the vicinity of AH-2 to an approximate depth of 4.0' below surface. After excavation, a trench (T-1A) was installed and samples were collected at 0-1.0', 2.0' and 3.0' BEB for chloride analysis. The samples showed chloride concentrations decreasing below 250 mg/kg at 3.0' below the excavation bottom.

Based upon the depth to groundwater, and remediation performed at this facility, Pogo requests closure of this site. A copy of the C-141 (Final) is included in Appendix C. If you require any additional information or have any questions or comments concerning the assessment report, please call (432) 682-4559.

HIGHLANDER ENVIRONMENTAL CORP,

Tim Reed

Timothy M. Reed, P.G.
Vice President

cc: Don Riggs – Pogo Producing Company
Pat Ellis – Pogo Producing Company

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

February 7, 2006

Mr. Pat Ellis EllisP@pogoproducing.com
Pogo Producing Company
300 N. Marienfield
Midland, TX 79701-7340

Re: M.K. Stewart Battery Closure Report
Site Location: Sec 28 – T23S - R36E
Closure Report Dated: January 10, 2005

Dear Mr. Ellis,

The New Mexico Oil Conservation Division (OCD) reviewed the above referenced report Submitted by your agent, Highlander Environmental Corp. (HEC). Based on information provided, the site requires no further action.

Please be advised that OCD approval does not relieve Pogo Producing Company of responsibility should operations result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve Pogo Producing Company of responsibility for compliance with any federal, state or local laws and/or regulations. If you have any questions or need assistance please call me at (505) 393-6161, x111 or e-mail larry.Johnson@state.nm.us

Sincerely,

Larry Johnson - Environmental Engineer

CC: Wayne Price - Environmental Bureau Chief
Chris Williams - District I Supervisor
Paul Sheeley- Environmental Engineer

Caperton, Patricia, EMNRD

From: Ike T [itavarez@hec-enviro.com]
Sent: Wednesday, January 25, 2006 7:23 AM
To: Caperton, Patricia, EMNRD
Subject: Pogo - M.K.Stewart Tank Battery, Lea Co. NM

Pogo Producing Company – (Arch Petroleum)
M.K Stewart Tank Battery
Section 28, T23S, R36E

Patricia,
As requested, the excavated material removed from the Site was transported to Sundance Services, Inc. located in Eunice, New Mexico. If you need additional information please call me, Thanks.

Highlander Environmental Corp.
Ike Tavarez, PG
Senior Geologist

Table 1
Pogo Producing Company
M.K. Stewart Tank Battery
Lea County, New Mexico

Sample ID	Date Sampled	Sample Depth (ft)	TPH (mg/kg)			Benzene (mg/kg)	Toluene (mg/kg)	Ethlybenzene (mg/kg)	Xylene (mg/kg)	Chloride (mg/kg)
			C6-C12	C12-C35	Total					
Auger holes north of facility										
AH-1	2/09/05	0-0.5	19.4	75.8	95	ND	ND	ND	0.0314	121
AH-1	2/09/05	1.0-1.5	13.5	31.6	45.1	-	-	-	-	142
AH-1	2/09/05	2.0-2.5	ND	ND	ND	-	-	-	-	311
AH-2	2/09/05	0-0.5	ND	ND	ND	-	-	-	-	2600
AH-2	2/09/05	1.0-1.5	16.9	75.1	92	-	-	-	-	471
AH-2 Comp.1	4/07/05	-	-	-	-	-	-	-	-	773
T-1A	10/25/05	1.0 (BEB)	-	-	-	-	-	-	-	850
T-1A	10/25/05	2.0(BEB)	-	-	-	-	-	-	-	906
T-1A	10/25/05	3.0 (BEB)	-	-	-	-	-	-	-	229
AH-3	2/09/05	0-0.5	ND	ND	ND	-	-	-	-	16.7
Auger holes inside facility firewall										
AH-4	2/14/05	0-1.0	82.8	1770	1,850	-	-	-	-	1430
AH-4	2/14/05	1.0-1.5	ND	102	102	-	-	-	-	1310
AH-4	4/06/05	2.0-2.5	-	-	-	-	-	-	-	466
AH-4	4/06/05	3.0-3.5	-	-	-	-	-	-	-	142
AH-5	2/14/05	0-1.0	4270	7,100	11,400	5.22	75.3	56.2	155.1	601
AH-5	2/14/05	1.0-1.5	ND	22.8	22.8	-	-	-	-	224
AH-6	2/14/05	0-0.5	ND	ND	ND	-	-	-	-	71

ND Analyte Not Detected at or Above Reporting Limits
(-) Not Analyzed

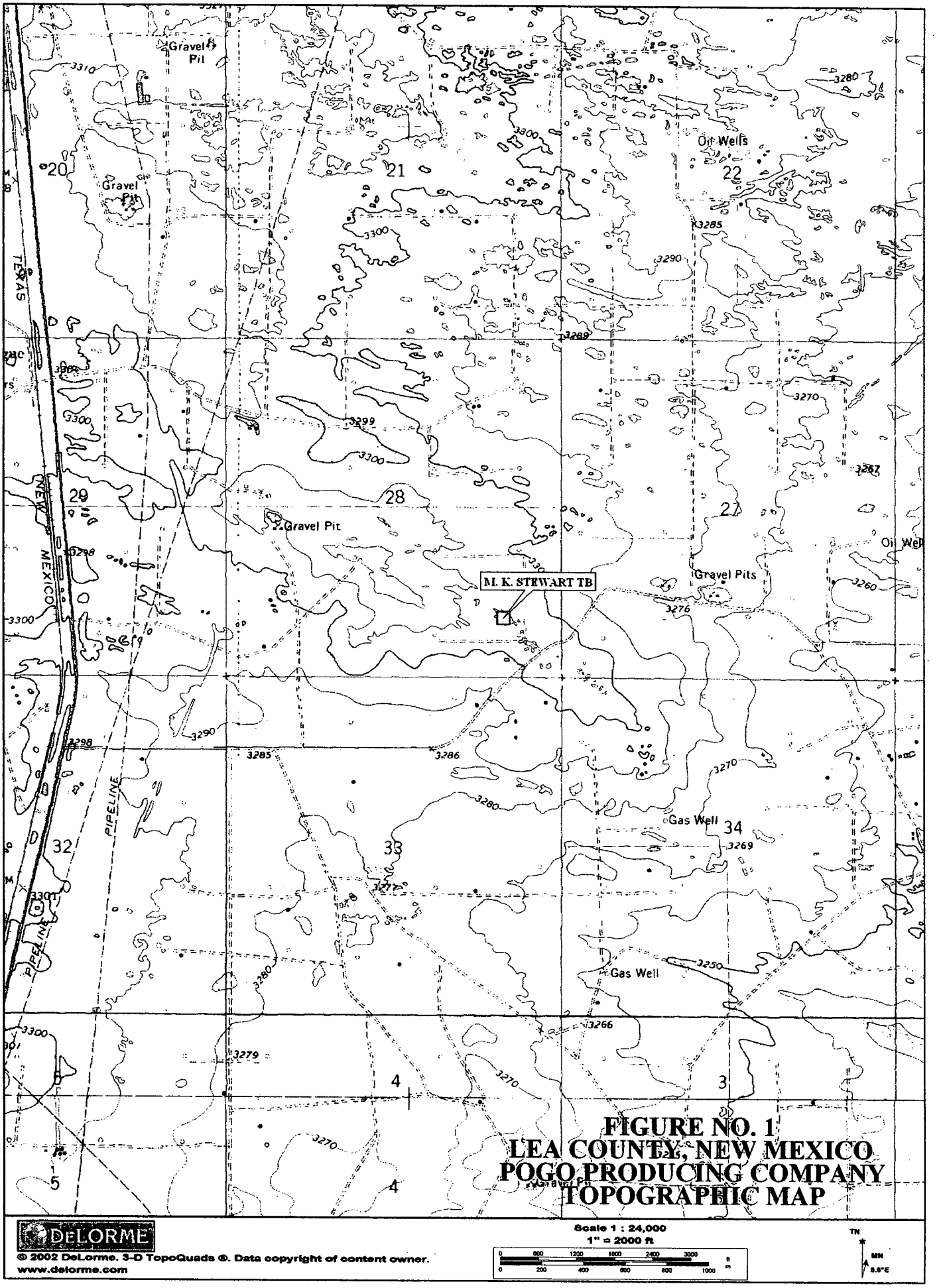
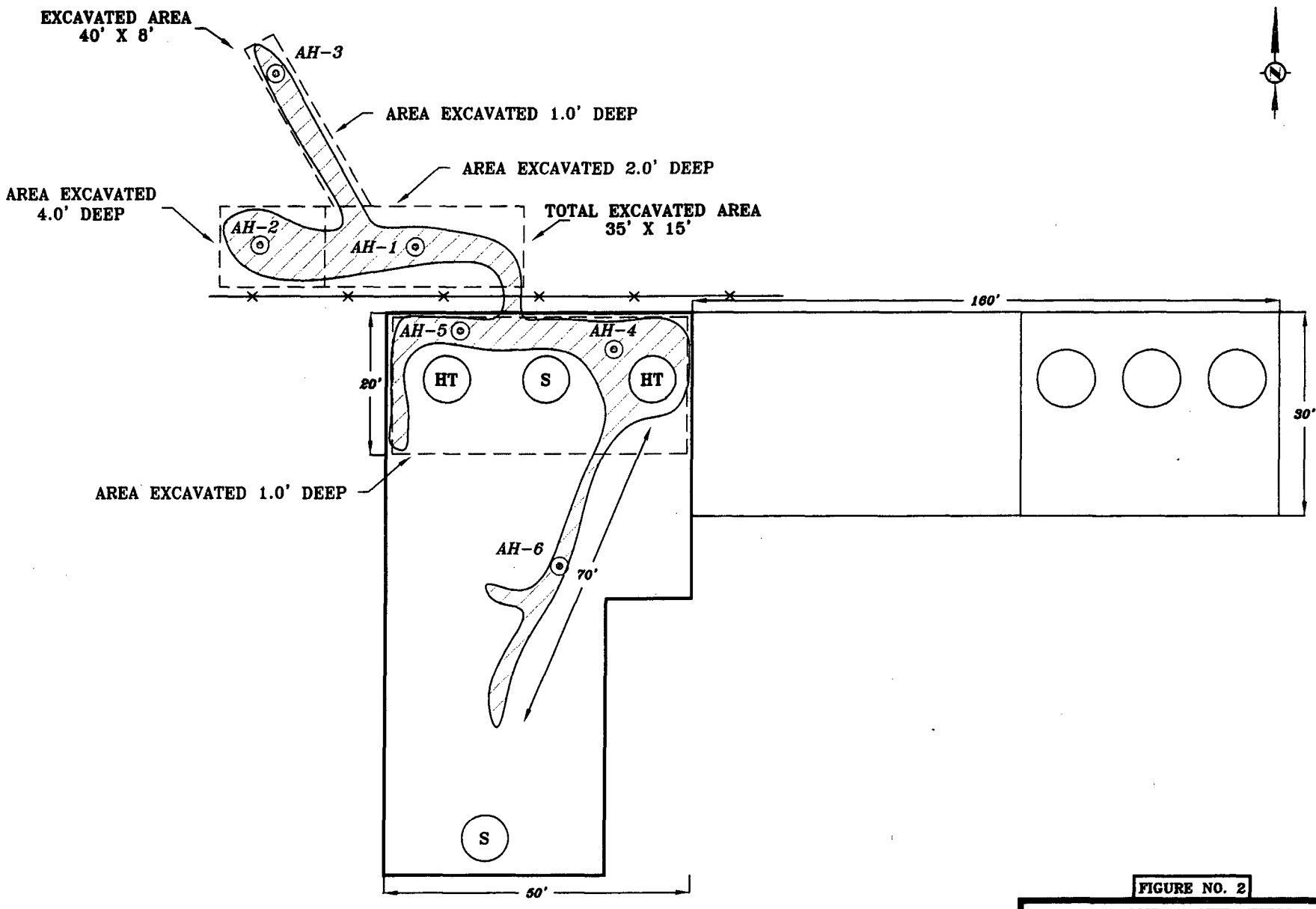


FIGURE NO. 1
LEA COUNTY, NEW MEXICO
POGO PRODUCING COMPANY
TOPOGRAPHIC MAP


EXCAVATED AREA
40' X 8'
AH-3
AREA EXCAVATED 1.0' DEEP
AREA EXCAVATED 2.0' DEEP
AREA EXCAVATED
4.0' DEEP
AH-2
AH-1
TOTAL EXCAVATED AREA
35' X 15'
160'
AH-5
AH-4
HT
S
HT
20'
30'
AREA EXCAVATED 1.0' DEEP
AH-6
70'
S
50'
SPILL AREA
SAMPLE LOCATION
EXCAVATED AREA
NOT TO SCALE
FIGURE NO. 2
LEA COUNTY, NEW MEXICO
POGO PRODUCING COMPANY
M. K. STEWART TB
DATE: 3/17/05
DWN. BY: JJ
FILE:
HIGHLANDER ENVIRONMENTAL CORP.
MIDLAND, TEXAS

New Mexico Office of the State Engineer
POD Reports and Downloads

Township: 23S Range: 36E Sections:

NAD27 X: Y: Zone: Search Radius:

County: Basin: Number: Suffix:

Owner Name: (First) (Last) Non-Domestic Domestic All

POD / Surface Data Report | Avg Depth to Water Report | Water Column Report

Clear Form | WATERS Menu | Help

AVERAGE DEPTH OF WATER REPORT 01/16/2006

								(Depth Water in Feet)		
Bsn	Tws	Rng	Sec	Zone	X	Y	Wells	Min	Max	Avg
CP	23S	36E	15				1	149	149	149
CP	23S	36E	16				1	220	220	220
CP	23S	36E	22				1	400	400	400
CP	23S	36E	31				2	178	200	189
CP	23S	36E	36				5	123	133	127

Record Count: 10

USGS

Water Resources

Data Category: Ground Water | Geographic Area: New Mexico | go

Ground-water levels for New Mexico

Search Results -- 1 sites found

Search Criteria

site_no list = • 321532103180002

Save file of selected sites to local disk for future upload

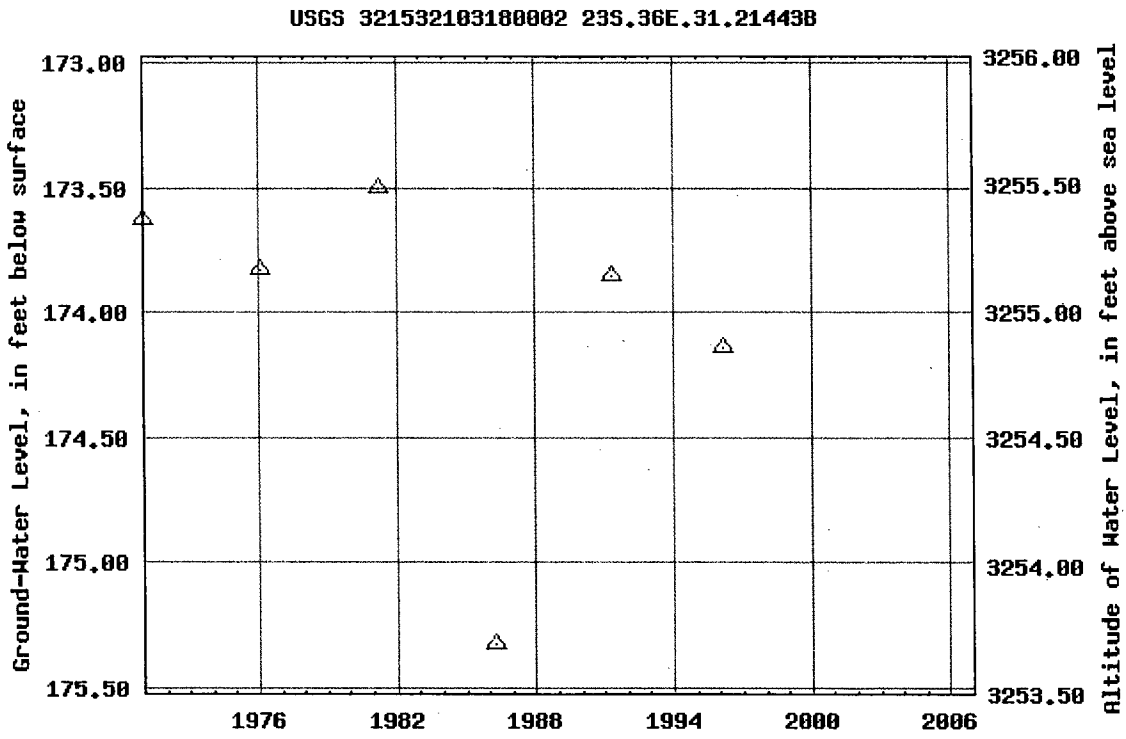
USGS 321532103180002 23S.36E.31.21443B

Available data for this site Ground-water: Levels | GO

Lea County, New Mexico
Hydrologic Unit Code 13070007
Latitude 32°15'32", Longitude 103°18'00" NAD27
Land-surface elevation 3,429.00 feet above sea level NGVD29
The depth of the well is 227 feet below land surface.
This well is completed in the OGALLALA FORMATION (121OGLL) local aquifer.

Output formats

- Table of data
- Tab-separated data
- Graph of data
- Reselect period



Breaks in the plot represent a gap of at least one calendar year between two consecutive points.
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Ground-water levels for New Mexico

Search Results -- 1 sites found

Search Criteria

site_no list = • 321540103125701

Save file of selected sites to local disk for future upload

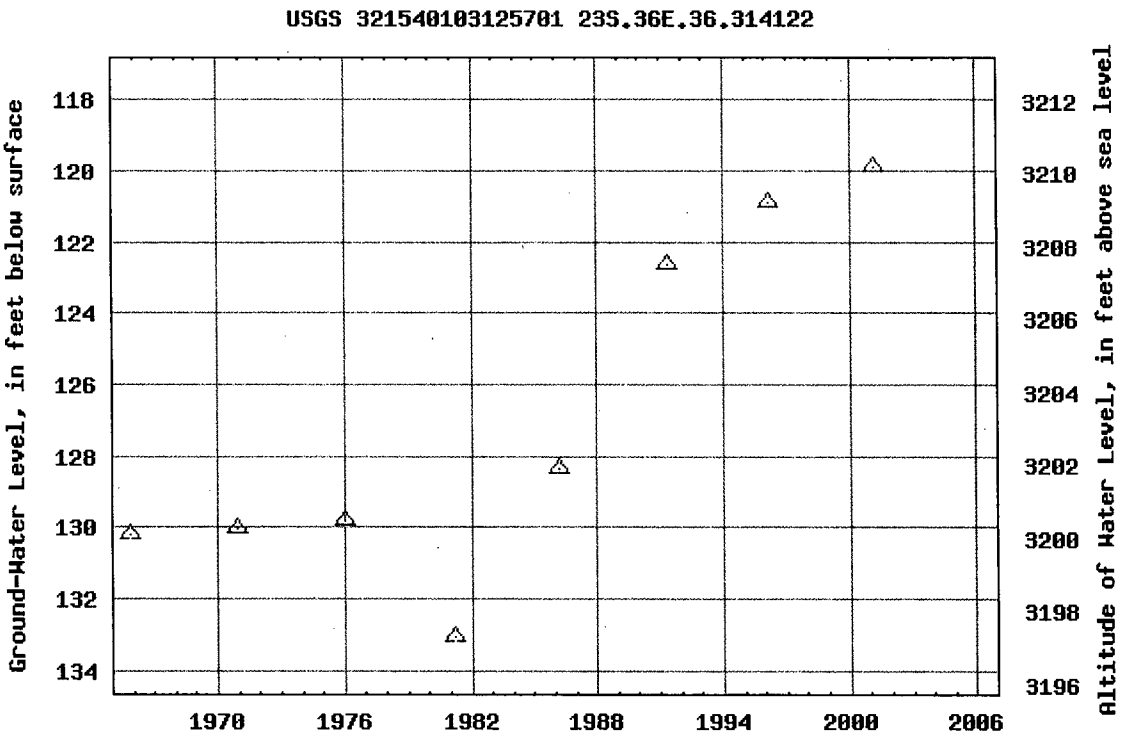
USGS 321540103125701 23S.36E.36.314122

Available data for this site Ground-water: Levels | GO

Lea County, New Mexico
Hydrologic Unit Code 13070007
Latitude 32°15'40", Longitude 103°12'57" NAD27
Land-surface elevation 3,330.20 feet above sea level NGVD29
The depth of the well is 263 feet below land surface.
This well is completed in the OGALLALA FORMATION (121OGLL) local aquifer.

Output formats

- Table of data
- Tab-separated data
- Graph of data
- Reselect period



Breaks in the plot represent a gap of at least one calendar year between two consecutive points.
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USGS

Water Resources

Data Category: Ground Water | Geographic Area: New Mexico | go

Ground-water levels for New Mexico

Search Results -- 1 sites found

Search Criteria

site_no list = • 321544103140201

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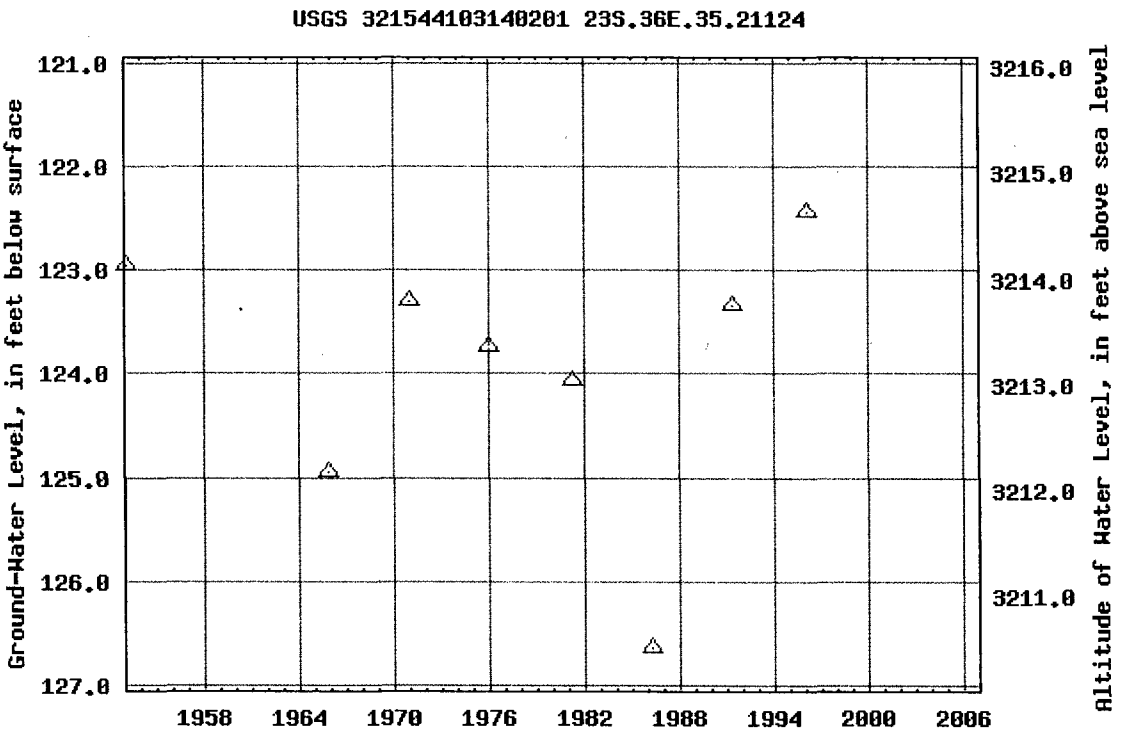
USGS 321544103140201 23S.36E.35.21124

Available data for this site Ground-water: Levels | GO

Lea County, New Mexico
Hydrologic Unit Code 13070007
Latitude 32°15'44", Longitude 103°14'02" NAD27
Land-surface elevation 3,337.10 feet above sea level NGVD29
The depth of the well is 170 feet below land surface.
This well is completed in the OGALLALA FORMATION (121OGLL) local aquifer.

Output formats

- Table of data
- Tab-separated data
- Graph of data
- Reselect period



Breaks in the plot represent a gap of at least one calendar year between two consecutive points.
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Top
Explanation of terms

Ground-water levels for New Mexico

Search Results -- 1 sites found

Search Criteria

site_no list = • 321549103143901

Save file of selected sites to local disk for future upload

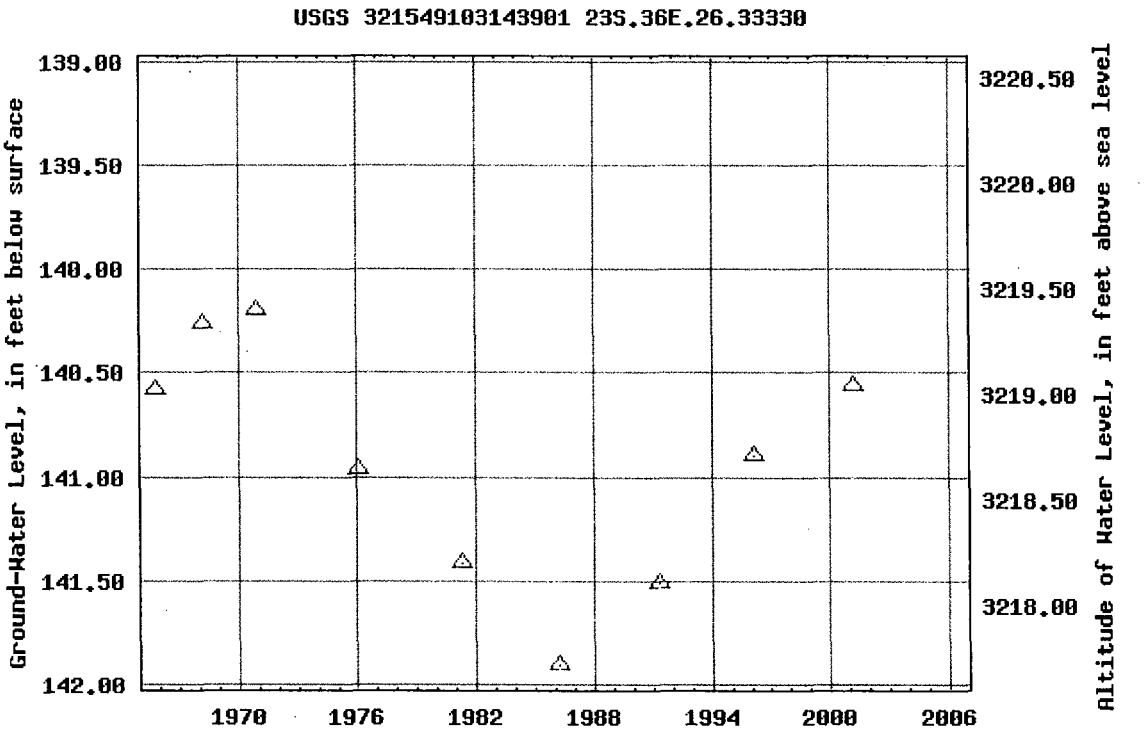
USGS 321549103143901 23S.36E.26.33330

Available data for this site Ground-water: Levels GO

Lea County, New Mexico
Hydrologic Unit Code 13070007
Latitude 32°15'49", Longitude 103°14'39" NAD27
Land-surface elevation 3,359.60 feet above sea level NGVD29
The depth of the well is 160 feet below land surface.
This well is completed in the OGALLALA FORMATION (121OGLL) local aquifer.

Output formats

- Table of data
- Tab-separated data
- Graph of data
- Reselect period



Breaks in the plot represent a gap of at least one calendar year between two consecutive points.
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USGS

Water Resources

Data Category: Ground Water | Geographic Area: New Mexico | go

Ground-water levels for New Mexico

Search Results -- 1 sites found

Search Criteria

site_no list = • 321936103154601

Save file of selected sites to local disk for future upload

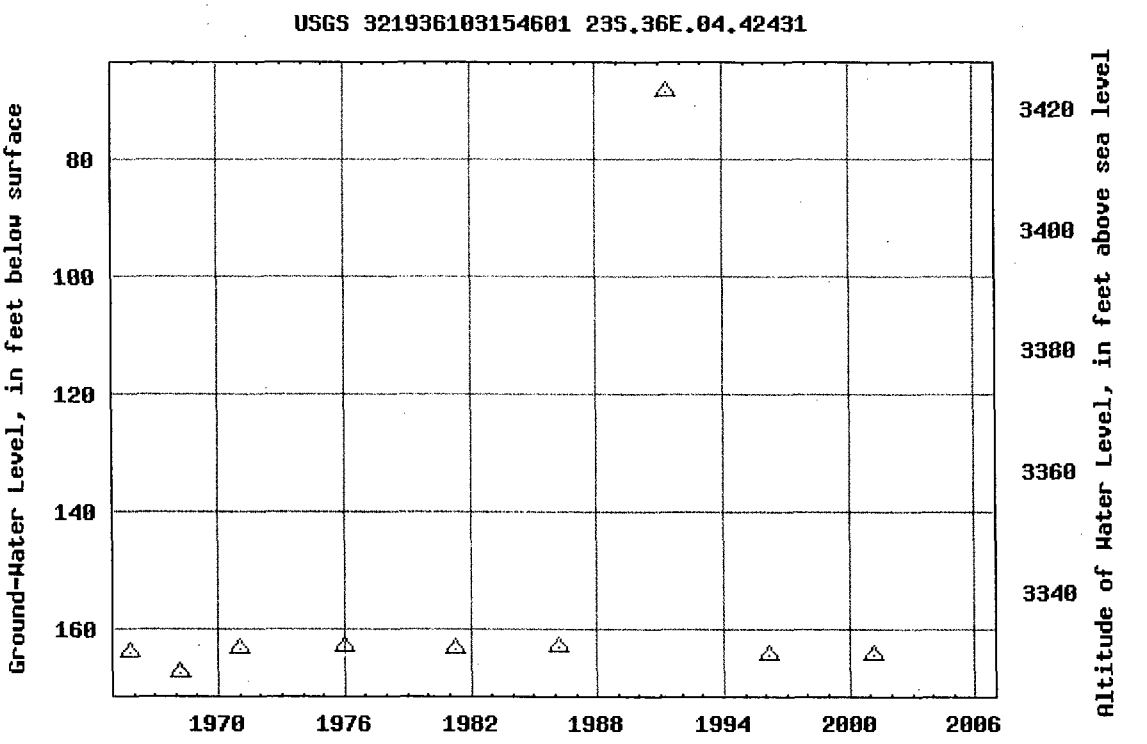
USGS 321936103154601 23S.36E.04.42431

Available data for this site Ground-water: Levels | GO

Lea County, New Mexico
Hydrologic Unit Code 13070007
Latitude 32°19'36", Longitude 103°15'46" NAD27
Land-surface elevation 3,492.50 feet above sea level NGVD29
The depth of the well is 206 feet below land surface.
This well is completed in the OGALLALA FORMATION (121OGLL) local aquifer.

Output formats

- Table of data
- Tab-separated data
- Graph of data
- Reselect period



Breaks in the plot represent a gap of at least one calendar year between two consecutive points.
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Feedback on this website New Mexico NWISWeb Maintainer Explanation of terms

Laboratory Analysis

February 9, 2005 Sampling

ENVIRONMENTAL LAB OF

12600 West I-20 East - Odessa, Texas 79765

Analytical Report

Prepared for:

Ike Tavarez

Highlander Environmental Corp.

1910 N. Big Spring St.

Midland, TX 79705

Project: Pogo/ M.K. Stewart Tank Battery Spill

Project Number: 2326

Location: Lea County, NM

Lab Order Number: 5B11029

Report Date: 02/22/05

Highlander Environmental Corp.	Project: Pogo/ M.K. Stewart Tank Battery Spill	Fax: (432) 682-3946
1910 N. Big Spring St.	Project Number: 2326	**Reported:**
Midland TX, 79705	Project Manager: Ike Tavarez	02/22/05 17:02

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
AH-1 (0-0.5') North of TB	5B11029-01	Soil	02/09/05 00:00	02/11/05 14:30
AH-1 (1.0'-1.5') North of TB	5B11029-02	Soil	02/09/05 00:00	02/11/05 14:30
AH-1 (2.0'-2.5') North of TB	5B11029-03	Soil	02/09/05 00:00	02/11/05 14:30
AH-2 (0-0.5') North of TB	5B11029-04	Soil	02/09/05 00:00	02/11/05 14:30
AH-2 (1.0'-1.5') North of TB	5B11029-05	Soil	02/09/05 00:00	02/11/05 14:30
AH-3 (0-0.5') North of TB	5B11029-06	Soil	02/09/05 00:00	02/11/05 14:30

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Organics by GC

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
AH-1 (0-0.5') North of TB (5B11029-01) Soil									
Benzene	ND	0.0250	mg/kg dry	25	EB52215	02/21/05	02/21/05	EPA 8021B	
Toluene	ND	0.0250	"	"	"	"	"	"	
Ethylbenzene	ND	0.0250	"	"	"	"	"	"	
Xylene (p/m)	**0.0314**	0.0250	"	"	"	"	"	"	
Xylene (o)	**J [0.0164]**	0.0250	"	"	"	"	"	"	J
Surrogate: a,a,a-Trifluorotoluene		*84.1 %*	*80-120*		"	"	"	"	
Surrogate: 4-Bromofluorobenzene		*90.7 %*	*80-120*		"	"	"	"	
Gasoline Range Organics C6-C12	**19.4**	10.0	mg/kg dry	1	EB51403	02/12/05	02/14/05	EPA 8015M	
Diesel Range Organics >C12-C35	**75.8**	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	**95.2**	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*99.0 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*83.0 %*	*70-130*		"	"	"	"	
AH-1 (1.0'-1.5') North of TB (5B11029-02) Soil									
Gasoline Range Organics C6-C12	**13.5**	10.0	mg/kg dry	1	EB51403	02/12/05	02/14/05	EPA 8015M	
Diesel Range Organics >C12-C35	**31.6**	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	**45.1**	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*92.2 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*80.6 %*	*70-130*		"	"	"	"	
AH-1 (2.0'-2.5') North of TB (5B11029-03) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EB51403	02/12/05	02/14/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*92.0 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*84.0 %*	*70-130*		"	"	"	"	
AH-2 (0-0.5') North of TB (5B11029-04) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EB51403	02/12/05	02/14/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*92.6 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*78.4 %*	*70-130*		"	"	"	"	

Organics by GC

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
AH-2 (1.0'-1.5') North of TB (5B11029-05) Soil									
Gasoline Range Organics C6-C12	**16.9**	10.0	mg/kg dry	1	EB51403	02/12/05	02/14/05	EPA 8015M	
Diesel Range Organics >C12-C35	**75.1**	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	**92.0**	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*96.0 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*76.8 %*	*70-130*		"	"	"	"	
AH-3 (0-0.5') North of TB (5B11029-06) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EB51403	02/12/05	02/14/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*91.6 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*71.2 %*	*70-130*		"	"	"	"	

General Chemistry Parameters by EPA / Standard Methods
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
AH-1 (0-0.5') North of TB (5B11029-01) Soil									
Chloride	**121**	5.00	mg/kg	10	EB52106	02/18/05	02/18/05	EPA 300.0	
% Moisture	**3.9**	0.1	%	1	EB51411	02/11/05	02/14/05	% calculation	
AH-1 (1.0'-1.5') North of TB (5B11029-02) Soil									
Chloride	**142**	5.00	mg/kg	10	EB52106	02/18/05	02/18/05	EPA 300.0	
% Moisture	**3.7**	0.1	%	1	EB51411	02/11/05	02/14/05	% calculation	
AH-1 (2.0'-2.5') North of TB (5B11029-03) Soil									
Chloride	**311**	20.0	mg/kg	40	EB52106	02/18/05	02/18/05	EPA 300.0	
% Moisture	**7.5**	0.1	%	1	EB51411	02/11/05	02/14/05	% calculation	
AH-2 (0-0.5') North of TB (5B11029-04) Soil									
Chloride	**2600**	100	mg/kg	200	EB52106	02/18/05	02/18/05	EPA 300.0	
% Moisture	**9.0**	0.1	%	1	EB51411	02/11/05	02/14/05	% calculation	
AH-2 (1.0'-1.5') North of TB (5B11029-05) Soil									
Chloride	**481**	20.0	mg/kg	40	EB52106	02/18/05	02/18/05	EPA 300.0	
% Moisture	**10.0**	0.1	%	1	EB51411	02/11/05	02/14/05	% calculation	
AH-3 (0-0.5') North of TB (5B11029-06) Soil									
Chloride	**16.7**	5.00	mg/kg	10	EB52106	02/18/05	02/18/05	EPA 300.0	
% Moisture	**11.7**	0.1	%	1	EB51411	02/11/05	02/14/05	% calculation	

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EB51403 - Solvent Extraction (GC)										
Blank (EB51403-BLK1)				Prepared & Analyzed: 02/12/05						
Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet							
Diesel Range Organics >C12-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	*40.6*		*mg/kg*	*50.0*		*81.2*	*70-130*			
Surrogate: 1-Chlorooctadecane	*37.6*		*"*	*50.0*		*75.2*	*70-130*			
LCS (EB51403-BS1)				Prepared & Analyzed: 02/12/05						
Gasoline Range Organics C6-C12	454	10.0	mg/kg wet	500		90.8	75-125			
Diesel Range Organics >C12-C35	480	10.0	"	500		96.0	75-125			
Total Hydrocarbon C6-C35	934	10.0	"	1000		93.4	75-125			
Surrogate: 1-Chlorooctane	*40.5*		*mg/kg*	*50.0*		*81.0*	*70-130*			
Surrogate: 1-Chlorooctadecane	*37.3*		*"*	*50.0*		*74.6*	*70-130*			
Calibration Check (EB51403-CCV1)				Prepared & Analyzed: 02/12/05						
Gasoline Range Organics C6-C12	496		mg/kg	500		99.2	80-120			
Diesel Range Organics >C12-C35	535		"	500		107	80-120			
Total Hydrocarbon C6-C35	1030		"	1000		103	80-120			
Surrogate: 1-Chlorooctane	*43.4*		*"*	*50.0*		*86.8*	*70-130*			
Surrogate: 1-Chlorooctadecane	*40.9*		*"*	*50.0*		*81.8*	*70-130*			
Matrix Spike (EB51403-MS1)		**Source: 5B11027-01**		Prepared & Analyzed: 02/12/05						
Gasoline Range Organics C6-C12	517	10.0	mg/kg dry	550	ND	94.0	75-125			
Diesel Range Organics >C12-C35	569	10.0	"	550	ND	103	75-125			
Total Hydrocarbon C6-C35	1090	10.0	"	1100	ND	99.1	75-125			
Surrogate: 1-Chlorooctane	*49.6*		*mg/kg*	*50.0*		*99.2*	*70-130*			
Surrogate: 1-Chlorooctadecane	*43.0*		*"*	*50.0*		*86.0*	*70-130*			
Matrix Spike Dup (EB51403-MSD1)		**Source: 5B11027-01**		Prepared & Analyzed: 02/12/05						
Gasoline Range Organics C6-C12	516	10.0	mg/kg dry	550	ND	93.8	75-125	0.194	20	
Diesel Range Organics >C12-C35	587	10.0	"	550	ND	107	75-125	3.11	20	
Total Hydrocarbon C6-C35	1100	10.0	"	1100	ND	100	75-125	0.913	20	
Surrogate: 1-Chlorooctane	*49.5*		*mg/kg*	*50.0*		*99.0*	*70-130*			
Surrogate: 1-Chlorooctadecane	*41.3*		*"*	*50.0*		*82.6*	*70-130*			

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EB52215 - EPA 5030C (GC)										
Blank (EB52215-BLK1)				Prepared & Analyzed: 02/21/05						
Benzene	ND	0.0250	mg/kg wet							
Toluene	ND	0.0250	"							
Ethylbenzene	ND	0.0250	"							
Xylene (p/m)	ND	0.0250	"							
Xylene (o)	ND	0.0250	"							
Surrogate: a,a,a-Trifluorotoluene	*80.4*		*ug/kg*	*100*		*80.4*	*80-120*			
Surrogate: 4-Bromofluorobenzene	*89.9*		*"*	*100*		*89.9*	*80-120*			
LCS (EB52215-BS1)				Prepared & Analyzed: 02/21/05						
Benzene	107		ug/kg	100		107	80-120			
Toluene	111		"	100		111	80-120			
Ethylbenzene	117		"	100		117	80-120			
Xylene (p/m)	239		"	200		120	80-120			
Xylene (o)	116		"	100		116	80-120			
Surrogate: a,a,a-Trifluorotoluene	*102*		*"*	*100*		*102*	*80-120*			
Surrogate: 4-Bromofluorobenzene	*111*		*"*	*100*		*111*	*80-120*			
Calibration Check (EB52215-CCV1)				Prepared: 02/21/05 Analyzed: 02/22/05						
Benzene	102		ug/kg	100		102	80-120			
Toluene	103		"	100		103	80-120			
Ethylbenzene	93.8		"	100		93.8	80-120			
Xylene (p/m)	211		"	200		106	80-120			
Xylene (o)	101		"	100		101	80-120			
Surrogate: a,a,a-Trifluorotoluene	*104*		*"*	*100*		*104*	*80-120*			
Surrogate: 4-Bromofluorobenzene	*90.2*		*"*	*100*		*90.2*	*80-120*			
Matrix Spike (EB52215-MS1)	**Source: 5B18009-05**			Prepared: 02/21/05 Analyzed: 02/22/05						
Benzene	2660		ug/kg	2500	ND	106	80-120			
Toluene	2760		"	2500	23.7	109	80-120			
Ethylbenzene	2690		"	2500	26.6	107	80-120			
Xylene (p/m)	5980		"	5000	76.6	118	80-120			
Xylene (o)	2820		"	2500	36.5	111	80-120			
Surrogate: a,a,a-Trifluorotoluene	*103*		*"*	*100*		*103*	*80-120*			
Surrogate: 4-Bromofluorobenzene	*113*		*"*	*100*		*113*	*80-120*			

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EB52215 - EPA 5030C (GC)										
Matrix Spike Dup (EB52215-MSD1)	**Source: 5B18009-05**			Prepared: 02/21/05 Analyzed: 02/22/05						
Benzene	2600		ug/kg	2500	ND	104	80-120	1.90	20	
Toluene	2700		"	2500	23.7	107	80-120	1.85	20	
Ethylbenzene	2560		"	2500	26.6	101	80-120	5.77	20	
Xylene (p/m)	5790		"	5000	76.6	114	80-120	3.45	20	
Xylene (o)	2710		"	2500	36.5	107	80-120	3.67	20	
Surrogate: a,a,a-Trifluorotoluene	*104*		"	*100*		*104*	*80-120*			
Surrogate: 4-Bromofluorobenzene	*108*		"	*100*		*108*	*80-120*			

General Chemistry Parameters by EPA / Standard Methods - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EB51411 - General Preparation (Prep)										
Blank (EB51411-BLK1)				Prepared: 02/11/05 Analyzed: 02/14/05						
% Moisture	ND	0.1	%							
Duplicate (EB51411-DUP1)		**Source: 5B10014-01**		Prepared: 02/11/05 Analyzed: 02/14/05						
% Moisture	10.9	0.1	%		12.1			10.4	20	
Batch EB52106 - Water Extraction										
Blank (EB52106-BLK1)				Prepared & Analyzed: 02/18/05						
Chloride	ND	0.500	mg/kg							
LCS (EB52106-BS1)				Prepared & Analyzed: 02/18/05						
Chloride	8.81		mg/L	10.0		88.1	80-120			
LCS Dup (EB52106-BSD1)				Prepared & Analyzed: 02/18/05						
Chloride	8.80		mg/L	10.0		88.0	80-120	0.114	20	
Calibration Check (EB52106-CCV1)				Prepared & Analyzed: 02/18/05						
Chloride	9.00		mg/L	10.0		90.0	80-120			
Duplicate (EB52106-DUP1)		**Source: 5B11018-01**		Prepared & Analyzed: 02/18/05						
Chloride	22.2	5.00	mg/kg		22.2			0.00	20	

Notes and Definitions

J	Detected but below the Reporting Limit; therefore, result is an estimated concentration (CLP J-Flag).
DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
RPD	Relative Percent Difference
LCS	Laboratory Control Spike
MS	Matrix Spike
Dup	Duplicate

Report Approved By: Raland K Tuttle Date: 2-23-05

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer
Jeanne Mc Murrey, Inorg. Tech Director
James L. Hawkins, Chemist/Geologist
Sandra Sanchez, Lab Tech.

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

Client: Highlander Environmental

Date/Time: 02-11-05 @ 1430

Order #: 5B11029

Initials: JMM

Sample Receipt Checklist

Temperature of container/cooler?	(Yes)	No	1.5 C
Shipping container/cooler in good condition?	Yes	No	N/A
Custody Seals intact on shipping container/cooler?	Yes	No	Not present N/A
Custody Seals intact on sample bottles?	Yes	No	(Not present)
Chain of custody present?	(Yes)	No	
Sample Instructions complete on Chain of Custody?	(Yes)	No	
Chain of Custody signed when relinquished and received?	(Yes)	No	
Chain of custody agrees with sample label(s)	(Yes)	No	
Container labels legible and intact?	(Yes)	No	
Sample Matrix and properties same as on chain of custody?	(Yes)	No	
Samples in proper container/bottle?	(Yes)	No	
Samples properly preserved?	(Yes)	No	
Sample bottles intact?	(Yes)	No	
Preservations documented on Chain of Custody?	(Yes)	No	
Containers documented on Chain of Custody?	(Yes)	No	
Sufficient sample amount for indicated test?	(Yes)	No	
All samples received within sufficient hold time?	(Yes)	No	
VOC samples have zero headspace?	(Yes)	No	Not Applicable

Other observations:

_____

_____

_____

Variance Documentation:

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

Regarding:

_____

_____

_____

Corrective Action Taken:

_____

_____

_____

_____

_____

_____

_____

_____

Analysis Request and Chain of Custody Record

HIGHLANDER ENVIRONMENTAL CORP.

1910 N. Big Spring St.
Midland, Texas 79705

(432) 682-4559 Fax (432) 682-3946

PAGE: OF:

CLIENT NAME: POGO SITE MANAGER: Ike Tavarez

PROJECT NO.: 2326 PROJECT NAME: POGO / M.K. Stewart Tank Battery Spill Lea County, NM

LAB I.D. NUMBER	DATE	TIME	MATRIX	COMP.	GRAB	SAMPLE IDENTIFICATION	NUMBER OF CONTAINERS	FILTERED (Y/N)	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE
5B11029 -01	2/9/05		S		X	AH-1 (0-0.5') North of TB	1				X	
-02			S		X	AH-1 (1.0'-1.5') " "	1				X	
-03			S		X	AH-1 (2.0'-2.5') " "	1				X	
-04			S		X	AH-2 (0-0.5') " "	1				X	
-05			S		X	AH-2 (1.0'-1.5') " "	1				X	
-06			S		X	AH-3 (0-0.5') " "	1				X	

ANALYSIS REQUEST (Circle or Specify Method No.)

BTEX 8020/602	MTBE 8020/602	TPH 418.1 / 8015 MOD. / TX1005	PAH 8270	RCRA Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pd Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	GC-MS Vol. 8240/8260/624	GC-MS Semi. Vol. 8270/625	PCB's 8080/608	Pest. 808/608	BOD, TSS, pH, TDS, Chloride	Gamma Spec.	Alpha Beta (Air)	PLM (Asbestos)
X		X											X			
		X											X			
		X											X			
		X											X			
		X											X			
		X											X			

RELINQUISHED BY: (Signature) Date: 2/11/05 Time: 2:30 — RECEIVED BY: (Signature) Date: Time:

RELINQUISHED BY: (Signature) Date: Time: — RECEIVED BY: (Signature) Date: Time:

RELINQUISHED BY: (Signature) Date: Time: — RECEIVED BY: (Signature) Date: Time:

SAMPLED BY: (Print & Sign) Ray Tolle Ke Date: 2/10/05 Time: 2:30

SAMPLE SHIPPED BY: (Circle) FEDEX BUS AIRBILL #: HAND DELIVERED UPS OTHER:

RECEIVING LABORATORY: Environmental Lab of Texas
ADDRESS:
CITY: Odessa STATE: TX ZIP:
CONTACT: PHONE:
RECEIVED BY: (Signature) Jana McNeary
DATE: 02-11-05 TIME: 1430

HIGHLANDER CONTACT PERSON: Ike Tavarez

Results by:

RUSH Charges Authorized: Yes No

SAMPLE CONDITION WHEN RECEIVED: 4oz glass on ice 1.5°C

MATRIX: W—Water A—Air SD—Solid S—Soil SL—Sludge O—Other

REMARKS: * Run (1) BTEX on highest TPH

Please Fill out all copies – Laboratory retains yellow copy – Return original copy to Highlander Environmental Corp. – Project Manager retains pink copy – Accounting receives Gold copy.

→ Tim Reed 2-17-5

Laboratory Analysis

February 14, 2005 Sampling

ENVIRONMENTAL LAB OF

12600 West I-20 East - Odessa, Texas 79765

Analytical Report

Prepared for:

Ike Tavarez

Highlander Environmental Corp.

1910 N. Big Spring St.

Midland, TX 79705

Project: Pogo/ M.K. Stewart Tank Battery Spill

Project Number: 2326

Location: Lea County, N.M.

Lab Order Number: 5B17011

Report Date: 02/23/05

Highlander Environmental Corp.	Project: Pogo/ M.K. Stewart Tank Battery Spill	Fax: (432) 682-3946
1910 N. Big Spring St.	Project Number: 2326	**Reported:**
Midland TX, 79705	Project Manager: Ike Tavarez	02/23/05 08:37

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
AH-4 (0-1.0')	5B17011-01	Soil	02/14/05 00:00	02/17/05 16:36
AH-4 (1.0-1.5')	5B17011-02	Soil	02/14/05 00:00	02/17/05 16:36
AH-5 (0-1.0')	5B17011-04	Soil	02/14/05 00:00	02/17/05 16:36
AH-5 (1.0-1.5')	5B17011-05	Soil	02/14/05 00:00	02/17/05 16:36
AH-6 (0-0.5')	5B17011-07	Soil	02/14/05 00:00	02/17/05 16:36

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Organics by GC

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
AH-4 (0-1.0') (5B17011-01) Soil									
Gasoline Range Organics C6-C12	**82.8**	50.0	mg/kg dry	5	EB51808	02/18/05	02/18/05	EPA 8015M	
Diesel Range Organics >C12-C35	**1770**	50.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	**1850**	50.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*7.96 %*	*70-130*		"	"	"	"	*S-06*
Surrogate: 1-Chlorooctadecane		*15.0 %*	*70-130*		"	"	"	"	*S-06*
AH-4 (1.0-1.5') (5B17011-02) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EB51808	02/18/05	02/18/05	EPA 8015M	
Diesel Range Organics >C12-C35	**102**	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	**102**	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*97.2 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*95.4 %*	*70-130*		"	"	"	"	
AH-5 (0-1.0') (5B17011-04) Soil									
Benzene	**5.22**	0.500	mg/kg dry	500	EB52215	02/21/05	02/22/05	EPA 8021B	
Toluene	**75.3**	0.500	"	"	"	"	"	"	
Ethylbenzene	**56.2**	0.500	"	"	"	"	"	"	
Xylene (p/m)	**115**	0.500	"	"	"	"	"	"	
Xylene (o)	**40.1**	0.500	"	"	"	"	"	"	
Surrogate: a,a,a-Trifluorotoluene		*179 %*	*80-120*		"	"	"	"	*S-04*
Surrogate: 4-Bromofluorobenzene		*111 %*	*80-120*		"	"	"	"	
Gasoline Range Organics C6-C12	**4270**	50.0	mg/kg dry	5	EB51808	02/18/05	02/18/05	EPA 8015M	
Diesel Range Organics >C12-C35	**7100**	50.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	**11400**	50.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*29.2 %*	*70-130*		"	"	"	"	*S-06*
Surrogate: 1-Chlorooctadecane		*18.0 %*	*70-130*		"	"	"	"	*S-06*
AH-5 (1.0-1.5') (5B17011-05) Soil									
Gasoline Range Organics C6-C12	**J [5.72]**	10.0	mg/kg dry	1	EB51808	02/18/05	02/18/05	EPA 8015M	J
Diesel Range Organics >C12-C35	**22.8**	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	**22.8**	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*84.2 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*82.0 %*	*70-130*		"	"	"	"	

Organics by GC

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
AH-6 (0-0.5') (5B17011-07) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EB51808	02/18/05	02/18/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		*82.6 %*	*70-130*		"	"	"	"	
Surrogate: 1-Chlorooctadecane		*78.4 %*	*70-130*		"	"	"	"	

General Chemistry Parameters by EPA / Standard Methods
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
AH-4 (0-1.0') (5B17011-01) Soil									
Chloride	**1430**	50.0	mg/kg	100	EB52107	02/19/05	02/19/05	EPA 300.0	
% Moisture	**4.3**	0.1	%	1	EB52104	02/18/05	02/21/05	% calculation	
AH-4 (1.0-1.5') (5B17011-02) Soil									
Chloride	**1310**	50.0	mg/kg	100	EB52107	02/19/05	02/19/05	EPA 300.0	
% Moisture	**4.7**	0.1	%	1	EB52104	02/18/05	02/21/05	% calculation	
AH-5 (0-1.0') (5B17011-04) Soil									
Chloride	**601**	20.0	mg/kg	40	EB52107	02/19/05	02/19/05	EPA 300.0	
% Moisture	**4.3**	0.1	%	1	EB52104	02/18/05	02/21/05	% calculation	
AH-5 (1.0-1.5') (5B17011-05) Soil									
Chloride	**224**	10.0	mg/kg	20	EB52107	02/19/05	02/19/05	EPA 300.0	
% Moisture	**3.9**	0.1	%	1	EB52104	02/18/05	02/21/05	% calculation	
AH-6 (0-0.5') (5B17011-07) Soil									
Chloride	**71.0**	5.00	mg/kg	10	EB52107	02/19/05	02/19/05	EPA 300.0	
% Moisture	**13.4**	0.1	%	1	EB52104	02/18/05	02/21/05	% calculation	

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EB51808 - Solvent Extraction (GC)										
Blank (EB51808-BLK1)				Prepared & Analyzed: 02/18/05						
Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet							
Diesel Range Organics >C12-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	*36.6*		*mg/kg*	*50.0*		*73.2*	*70-130*			
Surrogate: 1-Chlorooctadecane	*37.9*		*"*	*50.0*		*75.8*	*70-130*			
LCS (EB51808-BS1)				Prepared & Analyzed: 02/18/05						
Gasoline Range Organics C6-C12	420	10.0	mg/kg wet	500		84.0	75-125			
Diesel Range Organics >C12-C35	538	10.0	"	500		108	75-125			
Total Hydrocarbon C6-C35	958	10.0	"	1000		95.8	75-125			
Surrogate: 1-Chlorooctane	*39.4*		*mg/kg*	*50.0*		*78.8*	*70-130*			
Surrogate: 1-Chlorooctadecane	*47.2*		*"*	*50.0*		*94.4*	*70-130*			
Calibration Check (EB51808-CCV1)				Prepared & Analyzed: 02/18/05						
Gasoline Range Organics C6-C12	506		mg/kg	500		101	80-120			
Diesel Range Organics >C12-C35	532		"	500		106	80-120			
Total Hydrocarbon C6-C35	1040		"	1000		104	80-120			
Surrogate: 1-Chlorooctane	*50.1*		*"*	*50.0*		*100*	*70-130*			
Surrogate: 1-Chlorooctadecane	*45.8*		*"*	*50.0*		*91.6*	*70-130*			
Matrix Spike (EB51808-MS1)	**Source: 5B17011-07**			Prepared & Analyzed: 02/18/05						
Gasoline Range Organics C6-C12	598	10.0	mg/kg dry	577	ND	104	75-125			
Diesel Range Organics >C12-C35	613	10.0	"	577	ND	106	75-125			
Total Hydrocarbon C6-C35	1210	10.0	"	1150	ND	105	75-125			
Surrogate: 1-Chlorooctane	*61.0*		*mg/kg*	*50.0*		*122*	*70-130*			
Surrogate: 1-Chlorooctadecane	*57.7*		*"*	*50.0*		*115*	*70-130*			
Matrix Spike Dup (EB51808-MSD1)	**Source: 5B17011-07**			Prepared & Analyzed: 02/18/05						
Gasoline Range Organics C6-C12	585	10.0	mg/kg dry	577	ND	101	75-125	2.20	20	
Diesel Range Organics >C12-C35	616	10.0	"	577	ND	107	75-125	0.488	20	
Total Hydrocarbon C6-C35	1200	10.0	"	1150	ND	104	75-125	0.830	20	
Surrogate: 1-Chlorooctane	*59.6*		*mg/kg*	*50.0*		*119*	*70-130*			
Surrogate: 1-Chlorooctadecane	*49.4*		*"*	*50.0*		*98.8*	*70-130*			

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EB52215 - EPA 5030C (GC)										
Blank (EB52215-BLK1)				Prepared & Analyzed: 02/21/05						
Benzene	ND	0.0250	mg/kg wet							
Toluene	ND	0.0250	"							
Ethylbenzene	ND	0.0250	"							
Xylene (p/m)	ND	0.0250	"							
Xylene (o)	ND	0.0250	"							
Surrogate: a,a,a-Trifluorotoluene	*80.4*		*ug/kg*	*100*		*80.4*	*80-120*			
Surrogate: 4-Bromofluorobenzene	*89.9*		*"*	*100*		*89.9*	*80-120*			
LCS (EB52215-BS1)				Prepared & Analyzed: 02/21/05						
Benzene	107		ug/kg	100		107	80-120			
Toluene	111		"	100		111	80-120			
Ethylbenzene	117		"	100		117	80-120			
Xylene (p/m)	239		"	200		120	80-120			
Xylene (o)	116		"	100		116	80-120			
Surrogate: a,a,a-Trifluorotoluene	*102*		*"*	*100*		*102*	*80-120*			
Surrogate: 4-Bromofluorobenzene	*111*		*"*	*100*		*111*	*80-120*			
Calibration Check (EB52215-CCV1)				Prepared: 02/21/05 Analyzed: 02/22/05						
Benzene	102		ug/kg	100		102	80-120			
Toluene	103		"	100		103	80-120			
Ethylbenzene	93.8		"	100		93.8	80-120			
Xylene (p/m)	211		"	200		106	80-120			
Xylene (o)	101		"	100		101	80-120			
Surrogate: a,a,a-Trifluorotoluene	*104*		*"*	*100*		*104*	*80-120*			
Surrogate: 4-Bromofluorobenzene	*90.2*		*"*	*100*		*90.2*	*80-120*			
Matrix Spike (EB52215-MS1)	**Source: 5B18009-05**			Prepared: 02/21/05 Analyzed: 02/22/05						
Benzene	2660		ug/kg	2500	ND	106	80-120			
Toluene	2760		"	2500	23.7	109	80-120			
Ethylbenzene	2690		"	2500	26.6	107	80-120			
Xylene (p/m)	5980		"	5000	76.6	118	80-120			
Xylene (o)	2820		"	2500	36.5	111	80-120			
Surrogate: a,a,a-Trifluorotoluene	*103*		*"*	*100*		*103*	*80-120*			
Surrogate: 4-Bromofluorobenzene	*113*		*"*	*100*		*113*	*80-120*			

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EB52215 - EPA 5030C (GC)										
Matrix Spike Dup (EB52215-MSD1)	**Source: 5B18009-05**			Prepared: 02/21/05 Analyzed: 02/22/05						
Benzene	2600		ug/kg	2500	ND	104	80-120	1.90	20	
Toluene	2700		"	2500	23.7	107	80-120	1.85	20	
Ethylbenzene	2560		"	2500	26.6	101	80-120	5.77	20	
Xylene (p/m)	5790		"	5000	76.6	114	80-120	3.45	20	
Xylene (o)	2710		"	2500	36.5	107	80-120	3.67	20	
Surrogate: a,a,a-Trifluorotoluene	*104*		"	*100*		*104*	*80-120*			
Surrogate: 4-Bromofluorobenzene	*108*		"	*100*		*108*	*80-120*			

General Chemistry Parameters by EPA / Standard Methods - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EB52104 - General Preparation (Prep)										
Blank (EB52104-BLK1)				Prepared: 02/18/05 Analyzed: 02/21/05						
% Moisture	ND	0.1	%							
Duplicate (EB52104-DUP1)		Source: 5B17011-01		Prepared: 02/18/05 Analyzed: 02/21/05						
% Moisture	4.2	0.1	%		4.3			2.35	20	
Batch EB52107 - Water Extraction										
Blank (EB52107-BLK1)				Prepared & Analyzed: 02/19/05						
Chloride	ND	0.500	mg/kg							
LCS (EB52107-BS1)				Prepared & Analyzed: 02/19/05						
Chloride	9.49		mg/L	10.0		94.9	80-120			
LCS Dup (EB52107-BSD1)				Prepared & Analyzed: 02/19/05						
Chloride	9.17		mg/L	10.0		91.7	80-120	3.43	20	
Calibration Check (EB52107-CCV1)				Prepared & Analyzed: 02/19/05						
Chloride	9.40		mg/L	10.0		94.0	80-120			
Duplicate (EB52107-DUP1)		Source: 5B16006-02		Prepared & Analyzed: 02/19/05						
Chloride	88.4	20.0	mg/kg		85.8			2.99	20	

Notes and Definitions

S-06	The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
S-04	The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
J	Detected but below the Reporting Limit; therefore, result is an estimated concentration (CLP J-Flag).
DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
RPD	Relative Percent Difference
LCS	Laboratory Control Spike
MS	Matrix Spike
Dup	Duplicate

Report Approved By: Raland K Tuttle Date: 2-23-05

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer
Jeanne Mc Murrey, Inorg. Tech Director
James L. Hawkins, Chemist/Geologist
Sandra Sanchez, Lab Tech.

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

Client: Highlander Env

Date/Time: 2/17/05 4:30

Order #: SB17011

Initials: CK

Sample Receipt Checklist

Temperature of container/cooler?	Yes	No	2.5 C
Shipping container/cooler in good condition?	Yes	No	
Custody Seals intact on shipping container/cooler?	Yes	No	Not present
Custody Seals intact on sample bottles?	Yes	No	Not present
Chain of custody present?	Yes	No	
Sample Instructions complete on Chain of Custody?	Yes	No	
Chain of Custody signed when relinquished and received?	Yes	No	
Chain of custody agrees with sample label(s)	Yes	No	
Container labels legible and intact?	Yes	No	
Sample Matrix and properties same as on chain of custody?	Yes	No	
Samples in proper container/bottle?	Yes	No	
Samples properly preserved?	Yes	No	
Sample bottles intact?	Yes	No	
Preservations documented on Chain of Custody?	Yes	No	
Containers documented on Chain of Custody?	Yes	No	
Sufficient sample amount for indicated test?	Yes	No	
All samples received within sufficient hold time?	Yes	No	
VOC samples have zero headspace?	Yes	No	Not Applicable

Other observations:

_____

_____

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Variance Documentation:

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

Regarding:

_____

_____

_____

Corrective Action Taken:

_____

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Analysis Request and Chain of Custody Record

HIGHLANDER ENVIRONMENTAL CORP.

1910 N. Big Spring St.
Midland, Texas 79705

(432) 682-4559 Fax (432) 682-3946

PAGE: 1 OF: 1

CLIENT NAME: Pogo | SITE MANAGER: Ike Tavarez

PROJECT NO.: 2326 | PROJECT NAME: Pogo / MK Stewart Tank Battery Lea Co., NM Spill

LAB I.D. NUMBER	DATE	TIME	MATRIX	COMP.	GRAB	SAMPLE IDENTIFICATION	NUMBER OF CONTAINERS	FILTERED (Y/N)	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	BTEX 8020/602	MTBE 8020/602	TPH 418.1 / 8015 MOD / TX1005	PAH 8270	RCRA Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pd Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	GC/MS Vol. 8240/8260/624	GC/MS Semi. Vol. 8270/625	PCB's 8080/608	Pest. 608/608	BOD, TSS, pH, TDS, Chloride	Gamma Spec.	Alpha Beta (Air)	PLM (Asbestos)
-01	2-14-05		S		X	AH-4 (0-1.0')	1				X				X											X			
-02			S		X	AH-4 (1.0'-1.5')	1				X				X											X			
-03			S		X	AH-4 (2.0'-2.5')	1				X		TCH 2/19/05		Hold														
-04			S		X	AH-5 (0-1.0')	1				X			X	X											X			
-05			S		X	AH-5 (1.0'-1.5')	1				X				X											X			
-06			S		X	AH-5 (2.0'-2.5')	1				X				Hold														
-07			S		X	AH-6 (0-0.5')	1				X				X											X			
-08			S		X	AH-6 (0.5'-1.0')	1				X				Hold														
-09	↓		S		X	AH-6 (1.0'-1.5')	1				X				Hold														

B17011-02

RELINQUISHED BY: (Signature) Date: 2-17-05 Time: 4:20 | RECEIVED BY: (Signature) Date: Time:

RELINQUISHED BY: (Signature) Date: Time: | RECEIVED BY: (Signature) Date: Time:

RELINQUISHED BY: (Signature) Date: Time: | RECEIVED BY: (Signature) Date: Time:

SAMPLED BY: (Print & Sign) Ray Taylor Date: 2-16-05 Time:

SAMPLE SHIPPED BY: (Circle) FEDEX BUS AIRBILL #: HAND DELIVERED UPS OTHER:

RECEIVING LABORATORY: Environmental Lab of Texas
ADDRESS:
CITY: Odessa STATE: TX ZIP:
CONTACT: PHONE:

RECEIVED BY: (Signature) Jaime McMurry
DATE: 2-17-05 TIME: 1620

HIGHLANDER CONTACT PERSON: Ike Tavarez

Results by:

RUSH Charges Authorized: Yes No

SAMPLE CONDITION WHEN RECEIVED: 2.5°C 4oz glass on ice

MATRIX: W-Water A-Air SD-Solid (S-Soil) SL-Sludge O-Other

REMARKS: Run (1) BTEX on highest TPH

Please Fill out all copies - Laboratory retains yellow copy - Return original copy to Highlander Enviromental Corp. - Project Manager retains pink copy - Accounting receives Gold copy.

Laboratory Analysis

April 06, 2005 Sampling

ENVIRONMENTAL LAB OF

12600 West I-20 East - Odessa, Texas 79765

Analytical Report

Prepared for:

Ike Tavarez

Highlander Environmental Corp.

1910 N. Big Spring St.

Midland, TX 79705

Project: Pogo/ M.K. Stewart Tank Battery

Project Number: 2326

Location: Lea County, NM

Lab Order Number: 5D11008

Report Date: 04/15/05

Highlander Environmental Corp.	Project: Pogo/ M.K. Stewart Tank Battery	Fax: (432) 682-3946
1910 N. Big Spring St.	Project Number: 2326	**Reported:**
Midland TX, 79705	Project Manager: Ike Tavarez	04/15/05 07:42

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
AH-4 (2.0'-2.5')	5D11008-01	Soil	04/06/05 10:30	04/11/05 14:50
AH-4 (3.0-3.5')	5D11008-02	Soil	04/06/05 10:35	04/11/05 14:50
(AH-2) Composite #1 (0-0.5')	5D11008-08	Soil	04/07/05 09:30	04/11/05 14:50

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Highlander Environmental Corp.	Project: Pogo/ M.K. Stewart Tank Battery	Fax: (432) 682-3946
1910 N. Big Spring St.	Project Number: 2326	**Reported:**
Midland TX, 79705	Project Manager: Ike Tavarez	04/15/05 07:42

General Chemistry Parameters by EPA / Standard Methods

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
AH-4 (2.0'-2.5') (5D11008-01) Soil									
Chloride	**466**	20.0	mg/kg	40	ED51408	04/13/05	04/13/05	EPA 300.0	
AH-4 (3.0-3.5') (5D11008-02) Soil									
Chloride	**142**	5.00	mg/kg	10	ED51408	04/13/05	04/13/05	EPA 300.0	
(AH-2) Composite #1 (0-0.5') (5D11008-08) Soil									
Chloride	773	25.0	mg/kg	50	ED51409	04/14/05	04/14/05	EPA 300.0	

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Highlander Environmental Corp.	Project: Pogo/ M.K. Stewart Tank Battery	Fax: (432) 682-3946
1910 N. Big Spring St.	Project Number: 2326	**Reported:**
Midland TX, 79705	Project Manager: Ike Tavarez	04/15/05 07:42

General Chemistry Parameters by EPA / Standard Methods - Quality Control

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch ED51408 - Water Extraction										
Blank (ED51408-BLK1)				Prepared & Analyzed: 04/13/05						
Chloride	ND	0.500	mg/kg							
LCS (ED51408-BS1)				Prepared & Analyzed: 04/13/05						
Chloride	10.7		mg/L	10.0		107	80-120			
Calibration Check (ED51408-CCV1)				Prepared & Analyzed: 04/13/05						
Chloride	10.6		mg/L	10.0		106	80-120			
Duplicate (ED51408-DUP1)	**Source: 5D11005-11**			Prepared & Analyzed: 04/13/05						
Chloride	237	50.0	mg/kg		221			6.99	20	
Batch ED51409 - Water Extraction										
Blank (ED51409-BLK1)				Prepared & Analyzed: 04/14/05						
Chloride	ND	0.500	mg/kg							
LCS (ED51409-BS1)				Prepared & Analyzed: 04/14/05						
Chloride	10.9		mg/L	10.0		109	80-120			
Calibration Check (ED51409-CCV1)				Prepared & Analyzed: 04/14/05						
Chloride	10.3		mg/L	10.0		103	80-120			
Duplicate (ED51409-DUP1)	**Source: 5D11012-01**			Prepared & Analyzed: 04/14/05						
Chloride	23.2	5.00	mg/kg		20.0			14.8	20	

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Highlander Environmental Corp.	Project: Pogo/ M.K. Stewart Tank Battery	Fax: (432) 682-3946
1910 N. Big Spring St.	Project Number: 2326	**Reported:**
Midland TX, 79705	Project Manager: Ike Tavarez	04/15/05 07:42

Notes and Definitions

DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
RPD	Relative Percent Difference
LCS	Laboratory Control Spike
MS	Matrix Spike
Dup	Duplicate

Report Approved By: Celey D. Keene Date: 4/15/2005

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer
Jeanne Mc Murrey, Inorg. Tech Director
James L. Hawkins, Chemist/Geologist
Sandra Sanchez, Lab Tech.

Analysis Request and Chain of Custody Record

HIGHLANDER ENVIRONMENTAL CORP.

1910 N. Big Spring St.
Midland, Texas 79705

(432) 682-4559 Fax (432) 682-3946

PAGE: 1 OF: 1

CLIENT NAME: POGO SITE MANAGER: Ike Tavarez

PROJECT NO.: 2326 PROJECT NAME: POGO / M.K. Stewart TB
Lea County, NM

LAB I.D. NUMBER	DATE	TIME	MATRIX	COMP.	GRAB	SAMPLE IDENTIFICATION	NUMBER OF CONTAINERS	FILTERED (Y/N)	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE
5D11008												
-01	4-6-05	10:30	S		X	AH-4 (2.0'-2.5')	1				X	
-02	4-6-05	10:35	S		X	AH-4 (3.0'-3.5')	1				X	
-03	4-6-05	10:40	S		X	AH-4 (4.0'-4.5')	1				X	
-04	4-6-05	10:45	S		X	AH-4 (5.0-5.5')	1				X	
-05	4-6-05	1:30	S		X	T-1 (2.0') BED, (AH-2)	1				X	
-06	4-6-05	1:35	S		X	T-1 (3.0') BED, (AH-2)	1				X	
-07	4-6-05	1:40	S		X	T-1 (5.0') BED, (AH-2)	1				X	
-08	4-7-05	9:30	S	X		Composite #1 (AH-2) (0-0.5')	1				X	

ANALYSIS REQUEST (Circle or Specify Method No.)

BTEX 8260/8021	MTBE 8260/8021	TPH 418.1 8015 MOD. TX1005	PAH 8270	RCRA Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pd Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	GC-MS Vol. 8240/8260/624	GC-MS Semi Vol. 8270/625	PCB's 8082/608	Pest. 608/8081	BOD, TSS, pH, TDS, Chloride	Gamma Spec.	Alpha Beta (Air)	PLM (Asbestos)
													X			
													X			
													X			

4/25/05 Email to Ike Tavarez

RELINQUISHED BY: (Signature) Date: 4-11-05 Time: 2:50
RECEIVED BY: (Signature) Date: Time:

RELINQUISHED BY: (Signature) Date: Time:
RECEIVED BY: (Signature) Date: Time:

RELINQUISHED BY: (Signature) Date: Time:
RECEIVED BY: (Signature) Date: Time:

SAMPLED BY: (Print & Sign) Ray Taylor Date: 4-11-05 Time: 11:40

SAMPLE SHIPPED BY: (Circle)
FEDEX BUS AIRBILL #:
HAND DELIVERED UPS OTHER:

RECEIVING LABORATORY: Environmental Lab of Texas
ADDRESS:
CITY: Odessa STATE: TX ZIP:
CONTACT: PHONE:
RECEIVED BY: (Signature)
DATE: 04-11-05 TIME: 1450

HIGHLANDER CONTACT PERSON: Ike Tavarez

Results by:

RUSH Charges Authorized: Yes No

SAMPLE CONDITION WHEN RECEIVED: 3.5°C

MATRIX: W-Water A-Air SD-Solid (S-Soil) SL-Sludge O-Other

REMARKS: 4oz glass on ice w/seals
Seal on cooler

Please Fill out all copies - Laboratory retains yellow copy - Return original copy to Highlander Environmental Corp. - Project Manager retains pink copy - Accounting receives Gold copy.

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

Client: Highlander Env.

Date/Time: 04-11-05 @ 1450

Order #: 5D11008

Initials: JMM

Sample Receipt Checklist

Temperature of container/cooler?	(Yes)	No	3.5 C
Shipping container/cooler in good condition?	(Yes)	No	
Custody Seals intact on shipping container/cooler?	(Yes)	No	Not present
Custody Seals intact on sample bottles?	(Yes)	No	Not present
Chain of custody present?	(Yes)	No	
Sample Instructions complete on Chain of Custody?	(Yes)	No	
Chain of Custody signed when relinquished and received?	(Yes)	No	
Chain of custody agrees with sample label(s)	(Yes)	No	
Container labels legible and intact?	(Yes)	No	
Sample Matrix and properties same as on chain of custody?	(Yes)	No	
Samples in proper container/bottle?	(Yes)	No	
Samples properly preserved?	(Yes)	No	
Sample bottles intact?	(Yes)	No	
Preservations documented on Chain of Custody?	(Yes)	No	
Containers documented on Chain of Custody?	(Yes)	No	
Sufficient sample amount for indicated test?	(Yes)	No	
All samples received within sufficient hold time?	(Yes)	No	
VOC samples have zero headspace?	(Yes)	No	Not Applicable

Other observations:

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Variance Documentation:

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

Regarding:

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Corrective Action Taken:

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Laboratory Analysis

October 25, 2005 Sampling

ENVIRONMENTAL LAB OF

12600 West I-20 East - Odessa, Texas 79765

Analytical Report

Prepared for:

Ike Tavarez

Highlander Environmental Corp.

1910 N. Big Spring St.

Midland, TX 79705

Project: Pogo/ M.K. Stewart Tank Battery

Project Number: 2326

Location: Lea County, NM

Lab Order Number: 5J28002

Report Date: 11/02/05

Highlander Environmental Corp.	Project: Pogo/ M.K. Stewart Tank Battery	Fax: (432) 682-3946
1910 N. Big Spring St.	Project Number: 2326	**Reported:**
Midland TX, 79705	Project Manager: Ike Tavarez	11/02/05 12:24

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
T-1A 1.0' BEB	5J28002-01	Soil	10/25/05 00:00	10/27/05 17:25
T-1A 2.0' BEB	5J28002-02	Soil	10/25/05 00:00	10/27/05 17:25
T-1A 3.0' BEB	5J28002-03	Soil	10/25/05 00:00	10/27/05 17:25

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Highlander Environmental Corp.	Project: Pogo/ M.K. Stewart Tank Battery	Fax: (432) 682-3946
1910 N. Big Spring St.	Project Number: 2326	**Reported:**
Midland TX, 79705	Project Manager: Ike Tavarez	11/02/05 12:24

General Chemistry Parameters by EPA / Standard Methods

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
T-1A 1.0' BEB (5J28002-01) Soil									
Chloride	**850**	20.0	mg/kg	40	EK50206	10/31/05	11/02/05	EPA 300.0	
T-1A 2.0' BEB (5J28002-02) Soil									
Chloride	**906**	10.0	mg/kg	20	EK50206	10/31/05	11/02/05	EPA 300.0	
T-1A 3.0' BEB (5J28002-03) Soil									
Chloride	**229**	10.0	mg/kg	20	EK50206	10/31/05	11/02/05	EPA 300.0	

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Highlander Environmental Corp.	Project: Pogo/ M.K. Stewart Tank Battery	Fax: (432) 682-3946
1910 N. Big Spring St.	Project Number: 2326	**Reported:**
Midland TX, 79705	Project Manager: Ike Tavarez	11/02/05 12:24

General Chemistry Parameters by EPA / Standard Methods - Quality Control

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EK50206 - Water Extraction										
Blank (EK50206-BLK1)				Prepared: 10/31/17 Analyzed: 11/02/05						
Chloride	ND	0.500	mg/kg							
LCS (EK50206-BS1)				Prepared: 10/31/17 Analyzed: 11/02/05						
Chloride	8.58		mg/L	10.0		85.8	80-120			
Calibration Check (EK50206-CCV1)				Prepared: 10/31/17 Analyzed: 11/02/05						
Chloride	8.46		mg/L	10.0		84.6	80-120			
Duplicate (EK50206-DUP1)	**Source: 5J19010-03**			Prepared: 10/31/17 Analyzed: 11/02/05						
Chloride	130	5.00	mg/kg		133			2.28	20	

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Highlander Environmental Corp.	Project: Pogo/ M.K. Stewart Tank Battery	Fax: (432) 682-3946
1910 N. Big Spring St.	Project Number: 2326	**Reported:**
Midland TX, 79705	Project Manager: Ike Tavarez	11/02/05 12:24

Notes and Definitions

DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
RPD	Relative Percent Difference
LCS	Laboratory Control Spike
MS	Matrix Spike
Dup	Duplicate

Report Approved By: Celey D. Keene Date: 11/2/2005

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer
Jeanne Mc Murrey, Inorg. Tech Director
James L. Hawkins, Chemist/Geologist
Sandra Sanchez, Lab Tech.

Analysis Request and Chain of Custody Record

HIGHLANDER ENVIRONMENTAL CORP.

1910 N. Big Spring St.
Midland, Texas 79705

(432) 682-4559 Fax (432) 682-3946

PAGE: 1 OF: 1

CLIENT NAME: POGO SITE MANAGER: Ike Tavarez

PROJECT NO.: 2326 PROJECT NAME: POGO / M.K. Stewart TB

Lea County, NM

LAB I.D. NUMBER	DATE	TIME	MATRIX	COMP.	GRAB	SAMPLE IDENTIFICATION	NUMBER OF CONTAINERS	FILTERED (Y/N)	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	BTEX 8021B/602	MTBE 8021B/602	TPH 418.1 8015 MOD. TX1005	PAH 8270	RCRA Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	ICI	GC/MS Vol. 8240/8260/624	GC/MS Semi. Vol. 8270/625	PCB's 8082/608	Pest. 608/608	BOD, TSS, pH, TDS, Chlorides	Gamma Spec.	Alpha Beta (Air)	PLM (Asbestos)
532-8002																													
-01	10/25/05		S		X	T-1A (1.0') BED	1				X															X			
-02	10/25/05		S		X	T-1A (2.0') BED	1				X															X			
-03	10/25/05		S		X	T-1A (3.0') BED	1				X															X			
-04	10/25/05		S		X	T-1A (4.0') BED	1				X										HOLD								

RELINQUISHED BY: (Signature) Date: 10/27/05 Time: 5:25 RECEIVED BY: (Signature) Date: Time:

RELINQUISHED BY: (Signature) Date: Time: RECEIVED BY: (Signature) Date: Time:

RELINQUISHED BY: (Signature) Date: Time: RECEIVED BY: (Signature) Date: Time:

SAMPLED BY: (Print & Sign) Roy Taylor Date: 10/25/05 Time: 5:00

SAMPLE SHIPPED BY: (Circle) FEDEX BUS AIRBILL #: HAND DELIVERED UPS OTHER:

RECEIVING LABORATORY: ELT RECEIVED BY: (Signature)

ADDRESS: CITY: STATE: TX ZIP: CONTACT: PHONE: DATE: 10/27/05 TIME: 5:25

HIGHLANDER CONTACT PERSON: Ike Tavarez

Results by:

RUSH Charges Authorized: Yes No

SAMPLE CONDITION WHEN RECEIVED:

MATRIX: W-Water A-Air SD-Solid (S-Soil) SL-Sludge O-Other

REMARKS: Seal/Label 1.5

Please Fill out all copies - Laboratory retains yellow copy - Return original copy to Highlander Environmental Corp. - Project Manager retains pink copy - Accounting receives Gold copy.

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

Client: Highlander

Date/Time: 10/20/05 5:25

Order #: 5528002

Initials: CK

Sample Receipt Checklist

Temperature of container/cooler?	Yes	No	1.5 C
Shipping container/cooler in good condition?	(Yes)	No	
Custody Seals intact on shipping container/cooler?	Yes	No	(Not present)
Custody Seals intact on sample bottles?	(Yes)	No	Not present
Chain of custody present?	(Yes)	No	
Sample Instructions complete on Chain of Custody?	(Yes)	No	
Chain of Custody signed when relinquished and received?	(Yes)	No	
Chain of custody agrees with sample label(s)	(Yes)	No	
Container labels legible and intact?	(Yes)	No	
Sample Matrix and properties same as on chain of custody?	(Yes)	No	
Samples in proper container/bottle?	(Yes)	No	
Samples properly preserved?	(Yes)	No	
Sample bottles intact?	(Yes)	No	
Preservations documented on Chain of Custody?	(Yes)	No	
Containers documented on Chain of Custody?	(Yes)	No	
Sufficient sample amount for indicated test?	(Yes)	No	
All samples received within sufficient hold time?	(Yes)	No	
VOC samples have zero headspace?	(Yes)	No	Not Applicable

Other observations:

_____

_____

_____

Variance Documentation:

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

Regarding:

_____

_____

_____

Corrective Action Taken:

_____

_____

_____

_____

_____

_____

_____

_____

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 South First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

State of New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-141
Originated 2/13/97

Submit 2 copies to Appropriate District Office in accordance with Rule 116 on back side of form

Release Notification and Corrective Action
OPERATOR
☑ Initial Report ☐ Final Report

Name: ARCH PET INC	Contact: GARY WELLS
Address: EUNICE NM	Telephone No.: 432-631-0134
Facility Name: MK STEWART	Facility Type: TANK BATTERY

Surface Owner	Mineral Owner	Lease No.
Jimmy Doom	FEDRAL	27725

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
N	28	23	36					LEA

NATURE OF RELEASE

Type of Release: OIL & SW	Volume of Release: 80	Volume Recovered: 30
Source of Release: HEATER LEAK	Date and Hour of Occurrence: 2/6/05	Date and Hour of Discovery: N/A
Was Immediate Notice Given? ☑ Yes ☐ No ☐ Not Required	If YES, To Whom? FAXED 2/7/05	
By Whom? GARY WELLS	Date and Hour: 2/7/05	
Was a Watercourse Reached? ☐ Yes ☑ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully. (Attach Additional Sheets If Necessary)

Describe Cause of Problem and Remedial Action Taken. (Attach Additional Sheets If Necessary)
FIRE TUBE LEAK. - EMPTY TREATER P.U. RE-GROUND

Describe Area Affected and Cleanup Action Taken. (Attach Additional Sheets If Necessary)
AROUND TREATER BEHIND PAD IN PASTURE
TURN OVER TO ENVIROTECH FOR PLAN OF ACTION FOR CLEANUP

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: Gary Wells	OIL CONSERVATION DIVISION
Printed Name: GARY WELLS	Approved by District Supervisor:
Title: Field Supervisor	Approval Date: / Expiration Date:
Date: 2/7/05 Phone: 432-631-0134	Conditions of Approval: / Attached ☐

FAXED 2/7/05

SITE INFORMATION

General Site Information:	
Site:	**M.K. Stewart Tank Battery**
Company:	**Pogo Producing Company**
Section, Township and Range	**Section 28, Township 23S, Range 36E**
Unit Letter:	**N**
Lease Number:	**27725**
County:	**Lea**
GPS:	**32-16-14.6 N 103-09-44.2 W**
Surface Owner:	**Jimmy Doom**
Mineral Owner:	
Directions:	From Eunice intersection of Highways 18 and 234, travel south for 10.3 miles on Hwy. 18.
	Turn Left through gate onto lease road. Travel 3.5 miles on lease road. Road will turn right.
	Go 0.5 miles, turn right and go 0.1 mile to tank battery.

Release Data:	
Date Released:	2/6/2005
Type Release:	Oil & Produced Water
Source of Contamination:	Heater Treater Leak
Fluid Released:	80 barrels of oil and produced water
Fluids Recovered:	30 barrels oil and produced water

Official Communication:			
Name:	Pat Ellis	Don Riggs	Ike Tavarez
Company:	Pogo Producing Company	Pogo Producing Company	Highlander Environmental Corp.
Address:	300 N. Marienfeld St.	5 Greenway Plaza, Suite 2700	1910 N. Big Spring
P.O. Box	Box 10340		
City:	Midland Texas, 79701-7340	Houston, Texas 77046	Midland, Texas
Phone number:	(432) 685-8100	(713) 297-5045	(432) 682- 4559
Email:	EllisP@pogoproducing.com	riggsd@pogoproducing.com	itavarez@hec-enviro.com

Ranking Criteria		
Depth to Groundwater:	***Ranking Score***	***Site Data***
<50 ft	20	
50-99 ft	10	
>100 ft.	**0**	*0*
WellHead Protection:	***Ranking Score***	***Site Data***
Water Source <1,000 ft., Private <200 ft.	*20*	
Water Source >1,000 ft., Private >200 ft.	***0***	*0*
Surface Body of Water:	***Ranking Score***	***Site Data***
<200 ft.	*20*	
200 ft - 1,000 ft.	10	
>1,000 ft.	**0**	0
Total Ranking Score:	**0**	

Acceptable Soil RRAL (mg/kg)		
Benzene	*Total BTEX*	*TPH*
10	50	5,000

District I
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

Form C-141
Revised June 10, 2003

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

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☒ Final Report

Name of Company: Pogo Producing Company	Contact: Pat Ellis
Address: 300 North Marienfeld, Suite 600, Midland TX 79701	Telephone No. (432) 685-8100
Facility Name: M.K. Stewart	Facility Type: Tank Battery

Surface Owner Jimmy Doom	Mineral Owner Federal	Lease No. 27725

LOCATION OF RELEASE

Unit Letter	Section\	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
N	28	23S	36E					Lea

NATURE OF RELEASE

Type of Release Oil and produced water	Volume of Release 80 barrels	Volume Recovered 30 barrels
Source of Release Heater Treater Leakl	Date and Hour of Occurrence 2/06/2005	Date and Hour of Discovery N/A
Was Immediate Notice Given? ☒ Yes ☐ No ☐ Not Required	If YES, To Whom? Faxed 2/07/05	
By Whom? Gary Wells	Date and Hour 2/07/05	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*
A leak developed in the heater treater fire tube. When discovered, the treater was emptied and fluid was picked up.

Describe Area Affected and Cleanup Action Taken.*
The spill breached the facility dike and flowed out into a pasture to the north. Impacted soils inside the facility dike and out in the pasture were excavated. Highlander inspected the spill area, and colleted samples. Additional excavation was performed and confirmation samples collected. Soil samples were evaluated for BTEX, TPH and chloride.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: Patrick L. Ellis	OIL CONSERVATION DIVISION	
Printed Name: Pat Ellis	Approved by District Supervisor:	
Title: Division Environmental Safety & Health Supervisor	Approval Date:	Expiration Date:
E-mail Address: EllisP@pogoproducing.com	Conditions of Approval:	Attached ☐
Date: 1/18/06 Phone: (432) 685-8100		

* Attach Additional Sheets If Necessary