



Holme Roberts & Owen LLP
Attorneys at Law

DENVER

*Via Email and
First Class Mail*

July 7, 2008

BOULDER

Debbie Baldwin
Environmental Manager
COGCC
1120 Lincoln Street, Suite 801
Denver, CO 80203
debbie.baldwin@state.co.us

COLORADO SPRINGS

LONDON

Chris Canfield
Environmental Protection Specialist
707 Wapiti Ct., Suite 204
Rifle, CO 81650
chris.canfield@state.co.us

LOS ANGELES

Re: Nonsuch Natural Gas
June 19, 2008 Notice of Alleged Violation

MUNICH

Dear Ms. Baldwin and Mr. Canfield:

PHOENIX

This letter and the attachments hereto are provided in response to the Notice of Alleged Violation ("NOAV") issued by the Colorado Oil and Gas Conservation Commission ("COGCC") to Nonsuch Natural Gas, Inc. ("Nonsuch") on June 19, 2008. The NOAV was issued following the detection of volatile organic compounds in water from a spring (DWR #233234) owned by Mr. Ned Prather located in SWSW14 T6S R97W 6, Garfield County, CO.

SALT LAKE CITY

A written description of information requested by the COGCC is attached at Tab 1. Nonsuch's Form 27 is attached at Tab 2. A joint Form 27 and draft "Phase I Site Investigation and Workplan – Prather Spring Investigation" prepared by URS on behalf of Nonsuch, Williams Production RMT, Marathon Oil Co., and Petroleum Development Corporation is attached at Tab 3. The URS draft Phase I Site Investigation has not been finalized and is subject to revision. Nonsuch has not collected or analyzed any groundwater or soil

SAN FRANCISCO

Holme Roberts & Owen LLP
Attorneys at Law

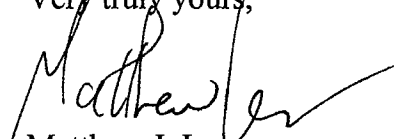
Debbie Baldwin
Chris Canfield
July 7, 2008
Page 2

samples to date. However, a summary of relevant analytical data collected by other entities and compiled by URS is attached at Tab 4.

David Lee, President of Nonsuch, has spoken with Mr. Prather about the impacts to his spring and the response actions being taken by Nonsuch and the other operators in proximity to Mr. Prather's spring. Mr. Lee has confirmed: 1) potable drinking has been supplied to Mr. Prather in the form of five-gallon jugs and a dispenser; 2) a bulk potable water tank has been installed on the Nonsuch well pad and piped to Mr. Prather's cabin for use in the toilet and shower and to flush the cabin's cistern; 3) Mr. Prather's stock pond and the area between the spring overflow and the stock pond have been fenced; and 4) Mr. Prather is constructing a new stock pond that will not be supplied by water from the impacted spring. Nonsuch will continue to monitor the status of these mitigation measures.

Please do not hesitate to contact me if you have questions about the foregoing.

Very truly yours,



Matthew J. Lepore

Encls.

Nonsuch Natural Gas, Inc.
Response to COGCC June 19, 2008 Notice of Alleged Violation

Abatement or Corrective Action Required to be Performed by Operator:

1. When Nonsuch Natural Gas acquired CSOC 697-14-1 in December 2005, there was an unlined mud pit on the well pad. The mud pit was dry and no production liquids were ever introduced into the pit by Nonsuch. Nonsuch has no additional information about the mud pit at this time. In August 2006, a completion water pit was constructed in the location where the mud pit had been to contain fracture water needed to perform fracture procedures on the CSOC 697-14 #1 wellbore. The pit was constructed by Hyland Enterprises, Inc. and was lined with a poly liner. The pit was approximately one hundred eighty feet long, fifty feet wide and fifteen feet deep on average with a two to one slope top to bottom.
2. The completion pit was filled with approximately 5,500 barrels of water from the Colorado river during the months of September and October 2006. The water stored in the pit was used to fracture three zones in the CSOC 697-14 #1 wellbore. The fracture treatments were performed on October 23, 2006 and October 28, 2006. The fracture treatments used virtually all of the water in the pit.

Subsequent to the fracture treatments this pit held flow back water and production water until the pit was closed and the area reclaimed in June 2008. No physical records of the volumes of flow back water or production water are available. Based on observation, flow back water volumes were extremely low between October 2006 and June 2007, and gas production was also very low. In June 2007, a swab rig was employed at the well and both flow back volumes and gas production increased. Similarly, production water volumes in the well were extremely low prior to June 2007, averaging less than 200 barrels per year. Production water volume increased slightly after June 2007.

In May 2008 two hundred forty barrels of fracture flow back water was moved to this pit and stored there temporarily. No haul tickets have been received yet for this fracture flow back water. Beginning in late May, all of the fluids in this pit were removed and the pit was reclaimed. In late May or early June, 400 barrels of liquid were removed by Blac-Frac Tanks, Inc. On June 2 and June 3, 2008 Old West Oil Field Services removed a total of 790 barrels. Given the size of the pit, the liquid remaining in the pit after June 3 was too shallow to allow additional removal until reclamation began and the pit size was reduced. An additional 880 barrels of liquid were removed by Old West between June 9-11 after the north end of the pit had been filled. In total, approximately two thousand barrels were removed from this pit in order to close the pit.

3. A small amount of condensate was observed on top of the water in the pit in June 2008. The condensate was skimmed from the pit in early June 2008, after COGCC had collected a sample of the liquid in the pit on June 4, 2008. The condensate skimmed

Attachment 1

from the pit was placed in the on-site condensate storage tank. The water remaining in the pit after the condensate was skimmed was removed and the pit was reclaimed.

4. When Nonsuch Natural Gas acquired CSOC 697-14-1 in December 2005, a 100 barrel standard oil field evaporation water tank on site was used to capture production water. Nonsuch removed this water tank at approximately the same time it installed the completion water pit in August 2006. The water tank was intact and was sold to another operator for continued use. There was no evidence of spills or leaks from this water tank and Nonsuch knows of no spills or releases from the water tank. A three hundred barrel condensate tank is on the CSOC 697-14 #1 well location. Nonsuch knows of no spills or releases of fluids from the condensate tank.

Attachment 1

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 (303)894-2100 Fax:(303)894-2109



FOR OGCC USE ONLY

SITE INVESTIGATION AND REMEDIATION WORKPLAN

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. Form 27 is intended to be used whenever possible. Additional documentation will be required when large volumes of soil and groundwater have been impacted or involve large facilities with multiple source areas. See Rule 910. Attach as many pages as needed to fully describe the proposed work.

OGCC Employee:

☐ Spill ☐ Complaint
☐ Inspection ☐ NOAV

Tracking No:

CAUSE OF CONDITION BEING INVESTIGATED AND REMEDIATED

☐ Spill or Release ☐ Plug & Abandon ☐ Central Facility Closure ☐ Site/Facility Closure ☒ Other (describe): Unknown cause

OGCC Operator Number: 10163Name of Operator: Nonsuch Natural Gas, Inc.Address: P.O. Box 110066City: NaplesState: FL Zip: 34108

Contact Name and Telephone:

David LeeNo: 239-289-9046Fax: 239-594-1422API Number: 05-045-07948County: Garfield

Facility Name: _____

Facility Number: 261391Well Name: CSOC 697-14-1Well Number: 1Location: (QtrQtr, Sec, Twp, Rng, Meridian): SWSW14 T6S R97W 6

Latitude: _____ Longitude: _____

TECHNICAL CONDITIONS

Type of Waste Causing Impact (crude oil, condensate, produced water, etc): Unknown

Site Conditions: Is location within a sensitive area (according to Rule 901e)? ☐ Y ☐ N If yes, attach evaluation.

Adjacent land use (cultivated, irrigated, dry land farming, industrial, residential, etc.): undeveloped

Soil type, if not previously identified on Form 2A or Federal Surface Use Plan: _____

Potential receptors (water wells within 1/4 mi, surface waters, etc.): DWR-233234

Description of Impact (if previously provided, refer to that form or document):

Impacted Media (check):

Extent of Impact:

How Determined:

☐

Soils

☐

Vegetation

☒

Groundwater

☐

Surface Water

Dissolved volatile organic compounds in spring dischargelaboratory analysis of water samples from spring

REMEDIATION WORKPLAN

Describe initial action taken (if previously provided, refer to that form or document):

Please refer to Joint Form 27, Chronology of Interim Response Activities, and Phase I Site Investigation Workplan submitted by URS on behalf of Nonsuch, Williams Production RMT, Marathon Oil Co., and Petroleum Development Corporation (referred to herein as "URS Joint Form 27").

Describe how source is to be removed:

Not yet determined.

Describe how remediation of existing impacts is to be accomplished, including removal and disposal at an injection well or licensed facility, land treatment on site, removal of impacted groundwater, insitu bioremediation, burning of oily vegetation, etc.:

Not yet determined.



REMEDIATION WORKPLAN (Cont.)

Tracking Number: _____
Name of Operator: _____
OGCC Operator No: _____
Received Date: _____
Well Name & No: _____
Facility Name & No: _____

OGCC Employee: _____

If groundwater has been impacted, describe proposed monitoring plan (# of wells or sample points, sampling schedule, analytical methods, etc.):

See URS Joint form 27.

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing. Use additional sheet for description if required.

Not yet determined.

Attach samples and analytical results taken to verify remediation of impacts. Show locations of samples on an onsite schematic or drawing.

Is further site investigation required? ☒ Y ☐ N If yes, describe:

See URS Joint Form 27.

Final disposition of E&P waste (landtreated and disposed onsite, name of licensed disposal facility, recycling, reuse, etc.):

IMPLEMENTATION SCHEDULE

Date Site Investigation Began: _____ Date Site Investigation Completed: _____ Date Remediation Plan Submitted: _____
Remediation Start Date: _____ Anticipated Completion Date: _____ Actual Completion Date: _____

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: _____ Signed: _____

Title: _____ Date: _____

OGCC Approved: _____ Title: _____ Date: _____

FORM
27
Rev 6/99State of Colorado
Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801, Denver, Colorado 80203
(303)894-2100 Fax: (303)894-2109

Page 2

REMEDIAL WORKPLAN (Cont.)

Tracking Number: _____
Name of Operator: _____
OGCC Operator No: _____
Received Date: _____
Well Name & No: _____
Facility Name & No: _____

OGCC Employee: _____

If groundwater has been impacted, describe proposed monitoring plan (# of wells or sample points, sampling schedule, analytical methods, etc.):

See URS Joint form 27.

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing. Use additional sheet for description if required.

Not yet determined.

Attach samples and analytical results taken to verify remediation of impacts. Show locations of samples on an onsite schematic or drawing.

Is further site investigation required?

☒ Y☐ N

If yes, describe:

See URS Joint Form 27.

Final disposition of E&P waste (landtreated and disposed onsite, name of licensed disposal facility, recycling, reuse, etc.):

IMPLEMENTATION SCHEDULE

Date Site Investigation Began: _____ Date Site Investigation Completed: _____ Date Remediation Plan Submitted: _____
Remediation Start Date: _____ Anticipated Completion Date: _____ Actual Completion Date: _____

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: DAVID LEE

Signed:

Title: PRESIDENT

Date: 7-7-2008

OGCC Approved: _____ Title: _____ Date: _____

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 (303)894-2100 Fax:(303)894-2109



FOR OGCC USE ONLY

SITE INVESTIGATION AND REMEDIATION WORKPLAN

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. Form 27 is intended to be used whenever possible. Additional documentation will be required when large volumes of soil and groundwater have been impacted or involve large facilities with multiple source areas. See Rule 910. Attach as many pages as needed to fully describe the proposed work.

CAUSE OF CONDITION BEING INVESTIGATED AND REMEDIATED

☐ Spill or Release ☐ Plug & Abandon ☐ Central Facility Closure ☐ Site/Facility Closure ☒ Other (describe): Unknown cause

OGCC Employee:

☐ Spill ☐ Complaint
☐ Inspection ☐ NOAV

Tracking No:

OGCC Operator Number: Joint Submittal by four (4) operators,Name of Operator: Please see attachments for complete information

Address: _____

City: _____ State: _____ Zip: _____

Contact Name and Telephone:

Michael Gardner, Williams Production RMTNo: 970-285-9377Fax: 970-285-9573API Number: Multiple WellsCounty: Garfield 045/23Facility Name: Please see attachments

Facility Number: _____

Well Name: _____

Well Number: _____

Location: (QtrQtr, Sec, Twp, Rng, Meridian): T6S R97W

Latitude: _____ Longitude: _____

TECHNICAL CONDITIONS

Type of Waste Causing Impact (crude oil, condensate, produced water, etc.): UnknownSite Conditions: Is location within a sensitive area (according to Rule 901e)? ☐ Y ☒ N If yes, attach evaluation.Adjacent land use (cultivated, irrigated, dry land farming, industrial, residential, etc.): Colluvium overlying Uinta Formation

Soil type, if not previously identified on Form 2A or Federal Surface Use Plan: _____

Potential receptors (water wells within 1/4 mi, surface waters, etc.): Prather Spring, SEO Permit #233234

Description of Impact (if previously provided, refer to that form or document):

Impacted Media (check):

☐

Soils

☐

Vegetation

☒

Groundwater

☐

Surface Water

Extent of Impact:

Not yet determined

How Determined:

Multiple samples collected and analyzed. See attached summary table.

REMEDIALTION WORKPLAN

Describe initial action taken (if previously provided, refer to that form or document):

See attached Chronology of Interim Response Activities. Phase I Site Investigation Workplan is attached for COGCC review and approval.

Describe how source is to be removed:

Not yet determined.

Describe how remediation of existing impacts is to be accomplished, including removal and disposal at an injection well or licensed facility, land treatment on site, removal of impacted groundwater, insitu bioremediation, burning of oily vegetation, etc.:

Not yet determined.



REMEDIALATION WORKPLAN (Cont.)

Tracking Number: _____
Name of Operator: _____
OGCC Operator No: _____
Received Date: _____
Well Name & No: _____
Facility Name & No: _____

OGCC Employee: _____

If groundwater has been impacted, describe proposed monitoring plan (# of wells or sample points, sampling schedule, analytical methods, etc.):

Installation of initial 6-12 soil borings and temporary monitoring wells scheduled for the week of July 7.
Please see attached Phase 1 - Site Investigation Workplan.

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing. Use additional sheet for description if required.

Not yet determined.

Attach samples and analytical results taken to verify remediation of impacts. Show locations of samples on an onsite schematic or drawing.

Is further site investigation required? ☒ Y ☐ N If yes, describe:

Please see attached Phase 1 - Site Investigation Workplan and Summary of Water Quality sample analytical results.

Final disposition of E&P waste (landtreated and disposed onsite, name of licensed disposal facility, recycling, reuse, etc.):

IMPLEMENTATION SCHEDULE

Date Site Investigation Began: _____ Date Site Investigation Completed: _____ Date Remediation Plan Submitted: _____
Remediation Start Date: _____ Anticipated Completion Date: _____ Actual Completion Date: _____

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: _____ Signed: _____

Title: _____ Date: July 3, 2008

OGCC Approved: _____ Title: _____ Date: _____

Company and Well Information for Joint Form 27 Submittal

Operator Name	Operator Number and Address
Williams Production RMT Company	WILLIAMS PRODUCTION RMT COMPANY - #96850 1515 ARAPAHOE ST STE 1000 DENVER , CO 80202 USA PHONE (303) 572-3900 FAX (303) 629-8265
Marathon Oil Company	MARATHON OIL COMPANY - #53650 743 HORIZON COURT #220 GRAND JUNCTION, CO 81506 PHONE (970) 245-5233 FAX (970) 245-6287
Petroleum Development Corporation	PETROLEUM DEVELOPMENT CORP - #69175 PO BOX 26 BRIDGEPORT , WV 26330 USA PHONE (304) 842-3597 FAX (304) 808-0913 EMERGENCY (800) 624-3821
Nonsuch Natural Gas Inc.	NONSUCH NATURAL GAS INC - #10163 P O BOX 110066 NAPLES , FL 34108 USA PHONE (239) 289-9046 FAX (239) 594-1422

Phase I Site Investigation Work Plan - Prather Spring Investigation

Table of Contents

1.0	Introduction.....	1
1.1	Project Background	1
1.2	Project Scope and Objectives	2
2.0	Phase I Site Investigation Activities.....	3
2.1	Drilling Methods and Monitoring Well Completions	3
2.2	Well Sampling.....	4
2.3	Field QA/QC Samples.....	5
2.4	Field Documentation.....	5
2.5	Sample Location Description	5
2.6	Equipment Decontamination.....	5
2.7	Project-Derived Wastes.....	6
2.8	Surveying	6
2.9	Safe Work Plan.....	6
3.0	Analytical Laboratory, Methods, and Data Management	7
3.1	Analytical Methods	7
3.2	Laboratory Coordination	7
3.3	Data Deliverables	8
3.4	Data Management.....	8
4.0	Reporting and Schedule	9
4.1	Reporting.....	9
4.2	Schedule	9

Phase I Site Investigation Work Plan - Prather Spring Investigation

List of Tables

Table 1 – Analytical Methods and QC Samples7

List of Attachments

Attachment A – Safe Work Plan

Phase I Site Investigation Work Plan - Prather Spring Investigation

1.0 Introduction

1.1 Project Background

This work plan was prepared at the request of Williams Production RMT Company (Williams), Petroleum Development Corporation (PDC), Marathon Oil Company (Marathon), and Nonsuch Natural Gas (Nonsuch) (collectively, “the Companies”), to outline the approach for delineating the contamination source or sources that have impacted a private drinking water supply in the form of a spring located in the vicinity of active natural gas development. The contaminated water is present at the Prather spring, which is, in fact, a manmade, permitted well identified as SEO Permit 233234, located in Section 14 (SE quarter of the SW quarter) of Township 6 south, Range 97 west and is referred to herein as the “Prather Spring.” From its origin, water from Prather Spring is piped approximately 0.25-miles down-slope to a hunting cabin (the Prather Cabin), where it is used seasonally as the main potable water supply. The overflow from this water delivery system flows down-gradient through additional piping and is eventually discharged into a perennial stream known as McKay Gulch. Figure 1 shows the locations of pertinent surface features, natural gas wells and well pads, sample locations, and proposed Phase I soil boring locations.

Contaminated water was discovered in Prather Spring on or around May 31, 2008, when one of the cabin owners (Mr. Ned Prather) turned on the cabin tap while opening up the hunting cabin for the summer season. Since that time, Williams and its consultant (HRL Resources) have collected at least four samples of the cabin tap and the spring. Marathon, PDC, and COGCC have also collected samples of this springs and other nearby springs and surface water samples from a stock pond and from McKay Gulch for analysis. Available water quality data from these recent sampling events have been considered in the development of this work plan. Benzene, toluene, and xylenes have been reported in samples from the spring and cabin tap, with benzene concentrations above the drinking water standard at both the spring and cabin tap. Subsequent water samples from springs in adjacent drainages are nondetect for these constituents, suggesting a localized source or sources of contaminants.

In addition to Williams, three other companies have drilling and production operations near the Prather cabin: Petroleum Development Corporation (PDC), Marathon Oil Company (Marathon), and Nonsuch Natural Gas (Nonsuch). It is our understanding that PDC drilled two nearby wells, which have now been transferred to Marathon for operation. These three companies and Williams are collectively referred to as “the Companies” throughout the remainder of this work plan. In response to the contaminant release, the Colorado Oil and Gas Conservation Commission (COGCC) issued each of the Companies a Notice of Alleged Violation (NOAV), and directed the Companies to provide an alternate

Phase I Site Investigation Work Plan - Prather Spring Investigation

drinking water supply for the cabin. The NOAV also included a requirement to provide a suitable alternate water supply for livestock consumption. The Companies have since complied with these directives, and have initiated a hydrogeologic investigation to delineate the contamination source(s). Williams retained URS Corporation (URS) to lead, conduct and oversee the joint investigation in the vicinity of the spring on behalf of the Companies. In addition to this proposed study, other operators are also responding to the NOAV, performing internal investigations, and collecting water samples for analysis.

URS personnel, accompanied by a Williams representative, made an initial visit to the site on June 26, 2008. The purpose of this visit was to observe the geologic and hydrogeologic conditions in order to formulate a strategy for the investigation. During the site visit, six borehole locations were staked in the field along three drainages that may contribute groundwater to the contaminated spring and associated drainage feature (Figure 1).

1.2 Project Scope and Objectives

The project scope will involve a phased investigation approach. The objective of this initial scope, Phase 1, is to identify the probable contamination source(s). Potential contaminant sources could include spills or leaks from reserve/production pits; condensate or produced water tanks or flow lines; or completed natural gas wellbores. More than the one round of drilling, monitoring well installation, and sampling described in this work plan may be required in Phase 1. Additionally, the number and locations of boreholes and temporary monitoring well installations may be increased or decreased from what is described in this work plan based on field observations during drilling and well installation activities.

Phase 2 activities would be designed to delineate the extent of any source(s) found during Phase 1 activities, including verification of the source(s) located on the well pads. Phase 3 activities would be designed to remediate the source(s) of the groundwater contamination identified from Phase 2 results.

The Companies are working under the assumption, that based on field evidence, if any operator can be ruled out as contributing to the source of contamination, that operator is no longer required to participate in the subsequent phases of investigation. Ideally, only the operator responsible for the contamination will actually be required to follow through with source area delineation and remediation activities, as necessary.

2.0 Phase 1 Site Investigation Activities

The first phase of the site investigation will include the installation of six to twelve temporary borings at locations staked by URS. The initial locations for the proposed soil boring and monitoring well are shown on Figure 1. Completion of the initial phase is designed to be flexible while in the field. The location of the source of contamination is unknown at this time and therefore the locations of boreholes must be flexible. Drilling and sampling activities will start at location PC-5 and proceed in an upstream direction. However, subsequent locations may be modified by conditions encountered at each borehole location. For example, an additional boring will likely be located further south up the drainage past PC-1.

Escorted access to the sampling sites will be provided by a Company representative. The Companies will arrange for site access for the site investigation activities with the two landowners in the area (Prather and Puckett).

2.1 Drilling Methods and Monitoring Well Completions

Williams has contracted Geotechnical Engineering Group (GEG), in Grand Junction, Colorado, to provide drilling services. URS personnel will direct the drilling and sampling activities while in the field. A Notice of Intent to construct the monitoring wells was completed and submitted by URS to the State Engineers Office (SEO) on July 1, 2008.

The soil borings will be advanced through the colluvium using hollow stem augers, and continuous core sampling will be performed at the first borehole location. Depending upon the geologic and hydrologic conditions, and contaminant observations, observed at the first location, subsequent boreholes may not need to be continuously cored. Solid flight augers will be available on the drill rig and may be required if large boulders are encountered in the colluvium, or the bedrock is sufficiently resistant.

Groundwater is anticipated to be encountered at shallow depths (5 to 15 feet below ground surface) at the contact between the colluvium and underlying Uinta Formation or Green River Formation bedrock. Based on the rate of discharge from the Prather Spring discharge pipe, it is anticipated that there will be sufficient groundwater present beneath the gulch/valley, which can be identified while drilling a borehole, and subsequently supply the necessary groundwater to obtain a sample from a monitoring well. This may not be the case at potential drilling sites located up-valley or along the margins of the valley.

At each boring location, URS personnel will screen the soil cores with a photo-ionization detector (PID) to identify potentially impacted soils, and identify appropriate intervals for soil sample collection. If

Phase I Site Investigation Work Plan - Prather Spring Investigation

impacted soils are encountered during drilling, a soil sample will be collected for possible laboratory analysis.

Assuming that groundwater is encountered at the bedrock interface, the borings will be drilled to a depth of 2 to 5 feet into the underlying bedrock, or until auger refusal. Temporary monitoring wells will be installed at each borehole for groundwater sample collection. Monitoring wells will consist of 2-inch diameter schedule 40 PVC material. A 5-foot long slotted screen section will be placed at the bottom of the borehole. A sandpack filter will be placed around the well screen, and extend approximately one foot above the top of the screen interval. A one to two feet thick bentonite seal will be placed above the sandpack. The remainder of the borehole will remain open until the laboratory analytical results are reviewed and the next phase of the investigation is initiated. The well casing will be cut-off above the ground surface to a height of approximately one foot, to minimize disturbance by wildlife and/or cattle. A locking cap will be placed and labeled with the designated identification on each well, and brightly-colored flagging will be attached to the casing.

Drilling equipment will be decontaminated following completion of each soil boring. Due to the remote location of the drill site, we anticipate decontaminating only the lead auger flight and drill-head. Decontamination procedures will consist of pressure-washing the equipment at a temporary decontamination pad. The temporary decontamination pad will be constructed on a Williams well pad. For soil coring/sampling equipment, decontamination procedures will consist of manually scrubbing the sample core barrel and rinsing with potable water between each use.

2.2 Well Sampling

Prior to collection of groundwater samples, the depth to water inside the well casing will be measured from the top of the PVC well casing and recorded for each well. Assuming that sufficient groundwater will flow into the monitoring wells, each monitoring well will be bailed using a disposable polyethylene bailer. Groundwater samples will be collected following removal of 3 well casing volumes. Field water quality parameters will be measured as each well is bailed. If there is insufficient water for 3 well casing volumes to be removed, the well will be bailed dry, and a sample collected when there is sufficient water in the well.

The samples collected during the initial investigation phase will be analyzed for volatile organic compounds using USEPA SW846 Method 8260. In addition, the VOC samples will be analyzed with a 24-hour turnaround time and dissolved methane samples will be analyzed with a 48-hour turnaround time. The data can be used to modify the investigation program while in the field. This will allow for a more

Phase I Site Investigation Work Plan - Prather Spring Investigation

flexible program that will assist in identifying the contaminant source(s) while reducing the number of mobilizations.

The Companies recognize that split/duplicate samples may be requested by Ned Prather (land owner), other participating operators, and COGCC. This is encouraged, provided there is sufficient water volume for collection of the necessary samples.

2.3 Field QA/QC Samples

The field quality control (QC) samples that will be collected include a field duplicate, a matrix spike (MS)/matrix spike duplicate (MSD), and a trip blank. Each type and quantity of field QC samples to be used are presented and described below. The frequency of collection is one of each QC sample per twenty primary samples. Since there are fewer than twenty primary samples anticipated for collection during the initial investigation phase, one sample for each of the three field QC categories will be collected for laboratory analysis.

2.4 Field Documentation

Field activities conducted will be thoroughly documented so that the samples collected are credible and defensible. Field documentation will consist of written, geographic (i.e., GPS), and photographic evidence of the sampling event at each site.

2.5 Sample Location Description

The coordinates of each sample site will be measured using a hand-held GPS unit so that the sample locations can be mapped using the Universal Transverse Mercator (UTM) coordinate system. Date-stamped digital photographs will be taken at each sample site to document its location and site conditions during sampling. An overall view of the sampling area or property should also be taken so that the sample locations are documented.

2.6 Equipment Decontamination

Pre-cleaned, disposable sampling equipment will be used to perform most of the sampling activities described in this work plan. Pre-cleaned, disposable sampling equipment does not need to be decontaminated prior to use. However, to prevent cross contamination, the equipment should remain in its sealed plastic bag until it is used.

To avoid cross contamination, non-dedicated drilling and sampling equipment will be thoroughly cleaned prior to initiation of sampling activities and between each use at the site. Decontamination of

Phase I Site Investigation Work Plan - Prather Spring Investigation

field instruments and sample containers used for groundwater sampling will include an Alconox[®], or equivalent, wash and scrubbing with a brush or sponge, as appropriate, to remove potential contaminants, followed by **three** deionized water rinses. Once cleaned, the decontaminated equipment will be stored in a manner to avoid subsequent contamination prior to its use at the next site. One equipment rinsate sample will be collected and analyzed. Rinsate samples will be collected and analyzed for the same analytical parameters as the associated field sample that was collected with the decontaminated equipment.

Decontaminated augers will be used at each drill location. The drill bits will be decontaminated between each drill location. Decontamination of drill bits will also include an Alconox[®] or equivalent, wash and scrubbing with a brush or sponge, as appropriate, to remove potential contaminants, followed by **three** deionized water rinses. Once cleaned, the decontaminated drill bits will be stored in a manner to avoid subsequent contamination prior to use at the next drill location.

2.7 Project-Derived Wastes

Project-derived wastes, largely soil cuttings and groundwater from well development and sampling, will be containerized and moved to a Williams well pad. Other wastes generated during the project will be decontaminated and contained in plastic bags and properly disposed by Williams.

2.8 Surveying

Temporary monitoring well locations will be surveyed by HRL Compliance personnel using a Trimble handheld GPS unit. This GPS meets the current GPS accuracy specifications required by the COGCC.

2.9 Safe Work Plan

A Safe Work Plan addressing job specific hazards is provided as Attachment A.

Note: COGCC has requested that during the field activities, the water supply cistern at the Prather Cabin be investigated and sampled to determine whether it is now useable or whether it needs to be closed.

Phase I Site Investigation Work Plan - Prather Spring Investigation

3.0 Analytical Laboratory, Methods, and Data Management

The samples will be shipped to ACZ Laboratory, Inc. in Steamboat Springs, Colorado. Expedited turnaround times of 24 hours for VOCs analysis and 48 hours for dissolved methane analysis has been negotiated with the laboratory. The laboratory Project Manager contact and shipping address are listed below. The laboratory will be notified in advance of all shipments and told of any incoming samples with special holding (i.e., short holding times, freezing) or analytical (i.e., short analysis time) requirements.

Laboratory contact information is as follows:

ACZ Laboratories, Inc.
2773 Downhill Drive
Steamboat Springs, Colorado 80487
1-800-334-5493 x110
(970) 879-6590 Phone
815-301-3857 Fax

Attn: Sue Webber
email: suew@acz.com

3.1 Analytical Methods

Groundwater samples collected from the temporary monitoring wells will be analyzed for volatile organic compounds (VOCs) using USEPA SW846 Method 8260 (Table 1).

Table 1 – Analytical Methods and QC Samples

Analysis	Bottle Requirements	Preservation Requirements	Holding Time	Field Quality Control Requirements		
				FD	MS/MSD	Trip Blank
VOCs (Method 8260B)	3 - 40 ml VOA Vials	HCl	14 days	1 per 20	1 per 20	1 per cooler

3.2 Laboratory Coordination

Given project schedule constraints, daily contact with the laboratory will be performed by a URS project chemist. Specifically, the laboratory will be contacted daily to confirm that samples are received and correctly logged in using the sample identification numbers; the correct project number, analytical methods, reporting limits, and quality assurance; and are scheduled for the appropriate analytes, and

Phase I Site Investigation Work Plan - Prather Spring Investigation

turnaround time. URS will request preliminary analytical results and will review these results for conformance to the specified analyte list, analytical methods, reporting limits, and quality assurance (QA). URS will submit an example of the required electronic data deliverable (EDD) format to the laboratory and establish laboratory compliance with the required format prior to the laboratory receiving the first samples.

3.3 *Data Deliverables*

Analytical data generated from the project will be received by URS in electronic format as well as a Level IV fully validateable hard copy from the laboratory. The laboratory will also provide a compact disc copy of the hard copy data to URS and will provide the Companies with the analytical data in electronic format. URS will load the electronic formatted data into a database. The electronic data will be verified against the hard copy reports with a frequency of 10 percent. Field data such as sample data, water levels, and field parameters will be entered using the templates included in the DBMS.

3.4 *Data Management*

Analytical results generated during this project will be directly imported from the electronic data deliverable (EDD) supplied by the laboratory into a Microsoft Access-based data management system (DMS). Field measurements and GPS coordinates for sample locations will also be included in the DMS. The DMS will be used for creating data tables and graphics for the site investigation report. Following the completion of data validation, if performed, data qualifiers, if necessary, will be entered into the DMS.

4.0 Reporting and Schedule

4.1 Reporting

COGCC has requested URS provide a brief daily activity report during field activities.

A brief initial investigation report will be completed immediately following completion of the field activities described above. The laboratory analytical results will be incorporated in the report as a summary table. The report will summarize field activities, and will include boring logs for each borehole, a well completion table, a list of samples collected at each location, and other pertinent field observations. The report will also describe geologic and hydrologic conditions encountered (i.e. colluvium lithology and thickness, depth to bedrock and bedrock lithologic descriptions, depth to first groundwater, a qualitative note of the groundwater flow at each borehole, and to the extent determinable, a description of the relationship between groundwater and the spring discharge).

A draft report will be submitted to the Companies electronically within 48 hours following receipt of the analytical data. Following receipt of comments, the report will be finalized and submitted to the Companies and COGCC.

4.2 Schedule

The drilling and the temporary monitoring well construction activities have been scheduled for July 10 and 11, 2008. However, the drilling will not commence until approval of this work plan is obtained from COGCC. We anticipate that all scheduled groundwater and potential soil samples can be submitted via overnight delivery to ACZ Laboratory located in Steamboat Springs, Colorado. on July 10th for delivery on July 11th. Ground water sampling will occur on the day following drilling and well construction or tentatively on July 14. Assuming that ACZ can perform either a 24- or 48-hour rush turnaround the reported laboratory results can be available by July 17. This schedule is based upon an assumption that the drilling activities and monitoring well construction can be performed in two days.

Should the temporary monitoring wells not produce sufficient water for sampling during the same day as well installation, a field crew will return to the site the following day to check the water levels in the monitoring wells. Subsequent groundwater sampling will be performed by a two-man team from HRL Compliance Solutions, Inc.

Phase I Site Investigation Workplan - Prather Spring Investigation

Attachment A - Safe Work Plan

**Williams Production RMT Company
Prather Spring Site Investigation Activities
Safe Work Plan**

Project: Phase 1 Site Investigation, Prather Spring **Project Number:** 22239335
Work Location: Parachute, Colorado **Date:** 7/7/2008
Scope of Work/ Task Descriptions: URS personnel will supervise drilling of soil borings and temporary monitoring wells, and collect groundwater samples.

Emergency Response Information

Contact	Phone Numbers
Principal - Mark Levorsen	(303) 796-4767 or (303) 913-0711
Project Manager – Craig Heydenberk	(970) 384-4739 or (970) 456-2515
Client Contact – Mike Gardner	970-285-9377 or 970-640-1855 (cell)
Health and Safety Manager – Sally Miller	(303) 740-2721 or (720) 320-1814
Regional H&S Manager – Tim Joseph	(303) 740-2767 or (303) 884-2548
URS Nurse – Jeanette Schrimsher (Incident Reporting)	(866) 326-7321 (24-hour)
Emergency	911
Nearest Hospital (map with directions attached)	
Richard Henry	(303) 740-3978 or (303) 994-1747
David Cox	(303) 796-4659 or (720) 289-0095
Mike Mestas	(970) 384-4731 or (970) 618-1872

- ☐ URS Safety Management Standards are attached. Note: Safety Management Standards are available from The SoURSe and at www.urshse.com (username = urshse, password = hardhat).
X Job-specific activity hazard analyses are attached.
X Employees have completed required field safety training.

Completed by: Tim Joseph Date: 8/2/07
PM review: Mark Levorsen Date: 7/3/08
H&S concurrence: Tim Joseph Date: 8/2/07

Site-Specific Hazards and Controls	
Potential Hazards	Controls
Working near drilling operations	<ul style="list-style-type: none"> Oil field rigs are very dangerous work environments with multiple hazards Specific significant hazards include pressurized lines, cranes and pulleys, falls, cable spools, drill rod piles, engulfment by sand/soil and large moving mechanical parts Hard hat, safety glasses and steel toe boots are always required. Hearing protection and Nomex coveralls may be required Stay clear of all work activities whenever possible Notify the drill crews when you will be entering their work areas Stay with a client HSE escort at all times when on the drilling pad Refer to applicable Drilling and Production Health and Safety and Emergency Response Plans.

Williams Production RMT Company
Prather Spring Site Investigation Activities
Safe Work Plan

Well field activities	<ul style="list-style-type: none"> • Watch out for large – fast moving vehicles • When possible, keep a safe distance from drilling platforms and other activities • Make eye contact with equipment operators before approaching • Stay away from stacked drill rod, cable spools and pinch points • Hard hats, steel toe shoes and safety glasses are required near any intrusive well field activities
------------------------------	--

General Physical Hazards and Controls	
Potential Hazards	Controls
All hazards	<ul style="list-style-type: none"> • Manage projects so that adequate time is allowed to complete tasks • Manage projects so that proper adequate equipment and supplies are available • Promote a positive safety attitude/culture • Employees must read this Safe Work Plan prior to work, and a copy must be available at the work site • Reevaluate the Task Hazard Analysis daily; consider changes in weather conditions, work activities, and other site conditions • Conduct a daily safety briefing or tailgate meeting • Document that each employee has completed the appropriate safety training and medical surveillance prior to working in the field; at a minimum, 4-hour Field Safety training is required • Attend any safety briefings required by site operators • Look out for each other and provide safety feedback to co-workers to increase safe behavior
Chemical hazards	<ul style="list-style-type: none"> • Water samples may require the use of acid as a sample preservative • When handling bottles containing acid, wear safety glasses and nitrile gloves • Make sure lids are attached tightly so acid does not leak • Refer to SMS 2 <i>Chemical Hazard Communication</i>
Aggressive individuals or potentially dangerous locations (e.g., high crime areas, deserted buildings, rough terrain)	<ul style="list-style-type: none"> • Get approval from property owners prior to access and see if the owner will accompany you • Work in teams of two or more • If you are alone maintain contact with someone at the office • Leave and/or contact help if you are threatened
Driving/vehicle safety	<ul style="list-style-type: none"> • Inspect vehicles prior to use, especially rental vehicles; know how to operate wipers, lights, etc. • Verify that equipment and supplies are secured (inside the cab as well as the truck bed) prior to vehicle movement • Understand and obey all local traffic rules • Wear seat belts and require passengers to wear seat belts • Don't speed, keep work site speeds below 15 mph unless posted otherwise • Don't drive for more than 8 hours in one day and do not work and drive for more than a total of 12 hours • Leave enough time to get to your destination without hurrying • When possible, avoid backing up, especially in parking lots • Park clear of traffic on right-of-ways; park vehicle between you and on-coming

**Williams Production RMT Company
Prather Spring Site Investigation Activities
Safe Work Plan**

General Physical Hazards and Controls	
Potential Hazards	Controls
	<ul style="list-style-type: none"> traffic Wear high-visibility vests with reflective strips when working near vehicles Refer to SMS 57 <i>Vehicle Safety Program</i> and SMS 32 <i>Work Zone Traffic Control</i>
Heat Stress	<ul style="list-style-type: none"> Know the signs and symptoms of thermal stress Use the buddy system in extreme conditions Have plenty of water available and stay hydrated Take breaks in a cool area as appropriate Wear sun screen Refer to SMS 59 <i>Cold Stress</i>
Remote locations	<ul style="list-style-type: none"> Identify the best means of communication prior to leaving for the site Cell phone coverage is spotty up on the ridge tops above McKay Gulch Ensure that your cell phone or radio is charged and working and that you understand how to use it Take plenty of water and some energy food Take a map, know how to describe your location Work in teams of at least two when working away from vehicles or when communication with the office is not available Refer to SMS 36 <i>Remote Travel Health and Safety</i>
Working alone	<ul style="list-style-type: none"> In situations where one sampler will be present at the site (not advised), the sampler will make frequent cell phone contact with the client or a URS contact in the office. In the morning, the sampler should review their days schedule with the client or the office contact, and the order in which the wells will be visited. The sampler should check in with the client or the office upon leaving each water well location, and tell their contact where the next well location is to be sampled. For sample collection at spring locations, a two-person sampling crew is always advised. One exception to this is if client employees will be riding along with the URS sampler to the spring. Refer to SMS 84 <i>Lone Worker</i>
Lifting	<ul style="list-style-type: none"> Minimize the movement of heavy objects, and use dollies or carts whenever possible Stretch before lifting Store heavy objects just below waist height Get help to lift heavy objects and plan the lift Bend at the knees; do not use your back Do not twist during lifts Refer to SMS 45 <i>Back Injury Prevention</i>

**Williams Production RMT Company
Prather Spring Site Investigation Activities
Safe Work Plan**

General Physical Hazards and Controls	
Potential Hazards	Controls
Severe weather	<ul style="list-style-type: none"> • Identify shelters prior to start of work • Listen to radio for warnings • Discontinue work and seek shelter if severe weather is approaching • Secure equipment and watch for flying debris, doors slamming shut, etc. • Passenger vehicles with the windows rolled up provide good shelter during lightning • If stuck outside during a tornado go to a low lying area away from debris and watch for flooding • Trailers are not safe during tornadoes
Sharp objects	<ul style="list-style-type: none"> • Wear appropriate work boots and work gloves • Avoid handling site debris or placing hands where you can not see • Use caution when working with any tool • Watch out for barbed wire and electrical fences; cover with a car mat to cross, or walk around • Refer to SMS 64 <i>Hand Safety</i> and SMS 16 <i>Hand Tools and Portable Equipment</i>
Slips, trips, and falls	<ul style="list-style-type: none"> • Maintain good housekeeping; keep the work area free from debris • Survey the work area and mark dips, holes and other hazards • Avoid steep and uneven terrain; watch where you step • Wear sturdy boots with good tread • Be especially cautious if wet or icy conditions are present; remember that snow can hide icy surfaces • Take the time to find a safe route to the desired location • Do not perform any activity with a fall exposure of 6 feet or more without using fall protection. Consult the Health and Safety Manager. • Refer to SMS 21 <i>Housekeeping</i> and SMS 40 <i>Fall Protection</i>
Excavations	<ul style="list-style-type: none"> • Excavation work is not expected during this project. Consult the Health and Safety Manager
Confined space entry	<ul style="list-style-type: none"> • Confined space entry is not authorized for this project. Consult the Health and Safety Manager

**Williams Production RMT Company
Prather Spring Site Investigation Activities
Safe Work Plan**

General Physical Hazards and Controls	
Potential Hazards	Controls
Emergencies and Incident Reporting	<ul style="list-style-type: none"> • Maintain a first aid kit, fire extinguisher and a roll of "Caution" tape in each vehicle and/or at the site • Consider keeping a disposable camera available at the job site to document near-misses or incidents • Report all incidents and near misses to the PM and the HSM or RHSM • Know the location of the nearest working phones and know how to direct emergency responders to your location prior to starting work • Know appropriate emergency contact numbers (911 or others as appropriate) • Know the location and route to the nearest hospital or clinic; check with locals to confirm • Report work-related injuries <u>immediately</u> to Jeanette Schrimsher, URS Occupational Health Manager (866) 326-7321 (24-hour number) • Refer to SMS 65 <i>Injury Management</i> • Refer to SMS 49 Incident Reporting

Biological Hazards and Controls	
Potential Hazards	Controls
Bloodborne Pathogens (hepatitis, HIV, etc.)	<ul style="list-style-type: none"> • Use "universal precautions" and assume any blood or body fluids are contaminated • Wear latex gloves to prevent exposure • Refer to SMS 51 <i>Blood-Borne Pathogens</i>
Ticks, spiders, mosquitoes, and other insects	<ul style="list-style-type: none"> • Cover skin with light colored clothing • Wear insect repellent; follow directions for use • Tape the interface between boots and pants • Check for ticks or insect bites after walking in habitat areas • Avoid heavily vegetated areas and wet areas, especially during dusk/night • Be familiar with symptoms of exposure to vectorborne disease (e.g., Lyme disease, West Nile virus) and seek treatment immediately if symptoms develop; refer to SMS 47 <i>Biological Hazards</i>
Poisonous Plants (poison ivy, poison oak, etc.)	<ul style="list-style-type: none"> • Tape long sleeves to work gloves, and tape both legs to boots to avoid contact with poisonous plants • If contact occurs, wash immediately with soap and water and wash clothing after contact • Refer to SMS 47 <i>Biological Hazards</i>
Snakes	<ul style="list-style-type: none"> • Wear high boots or snake chaps if there is a significant snake hazard • Make noise when approaching snake habitat and, to the extent possible, avoid such areas • Leave the immediate area if a snake is sighted; do not disturb or attempt to move snake
Small biting animals, including domestic animals	<ul style="list-style-type: none"> • Do not reach into potential habitats, e.g., logs, crevices, tall grass • Keep a distance from small animals to avoid potential disease (e.g., plague) • Check with owner prior to entering private property • Stay away from all animals including domestic dogs and cats • Never tease dogs

**Williams Production RMT Company
Prather Spring Site Investigation Activities
Safe Work Plan**

	<ul style="list-style-type: none">• If approached by a dog and the owner is not there, do not reach your hand out. Stand still and let the dog sniff your shoe or leg• Do not stare at the dog's eyes• Raised hackles, growling, tail held stiffly, and staring are all signs that the dog may bite
Animal droppings (hantavirus, histoplasmosis, etc.)	<ul style="list-style-type: none">• Avoid animal droppings, nesting materials, and dead birds or animals• If you must work in areas near droppings/nesting materials, do not disturb and do not create dust. If dust is anticipated, respiratory protection may be needed. Consult the Health and Safety Manager.
Large mammals	<ul style="list-style-type: none">• Contact local Ranger Stations to identify hazards• Bears have been sighted in the McKay Gulch area• Make noise when walking in remote areas• If you encounter a bear, do not run; walk away slowly• Moose and bison can also attack if threatened• If signs of large mammals are indicated in the work area, contact a safety representative for additional control measures.• Also keep a safe distance from livestock

**Williams Production RMT Company
Prather Spring Site Investigation Activities
Safe Work Plan**

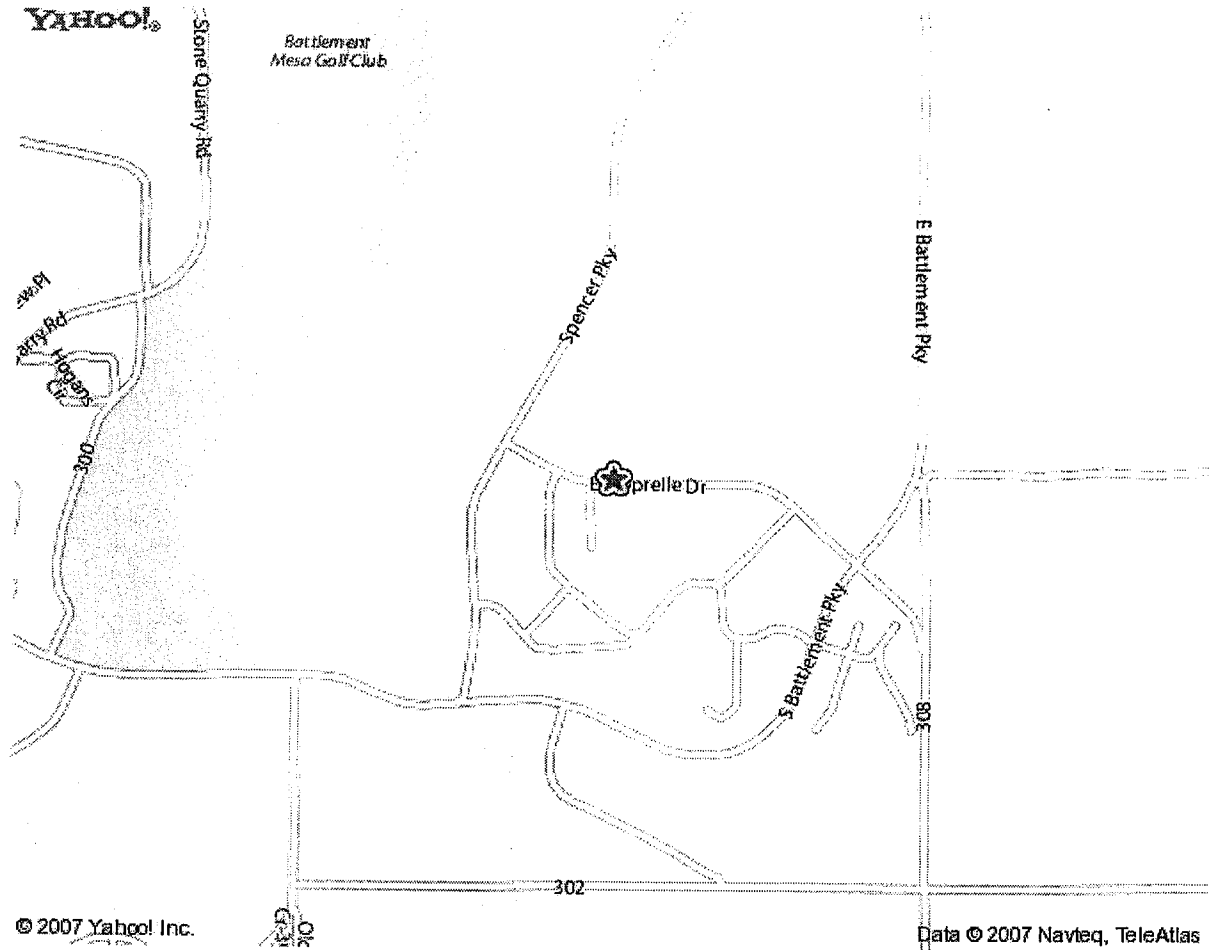
Battlement Mesa Medical Center (Monday – Friday 8:30-5:00)

73 Sipprelle Drive

Parachute, Colorado 81635

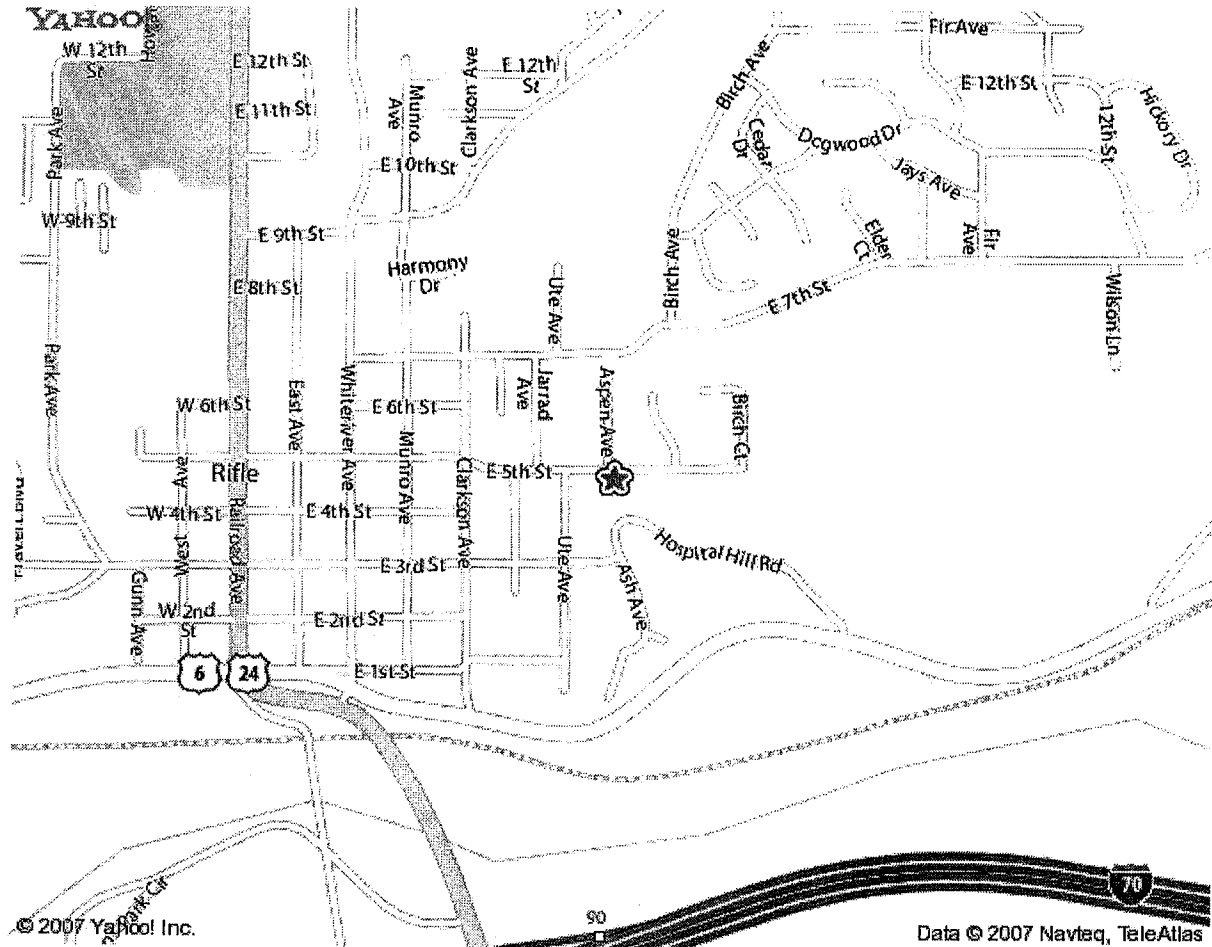
Telephone

970-285-7046



**Williams Production RMT Company
Prather Spring Site Investigation Activities
Safe Work Plan**

Clagett Memorial Hospital
701 East 5th Street
Rifle, Colorado 81650
Telephone
970-625-1510



**Prather Spring Investigation Map
T-6-S R-97-W**

Legend

- Marathon Sample Location
- Surface Water Sample Location
- Ground Water Sample Location
- Existing Well (based on COGCC data)



Table 1
Summary of Water Quality
Analytical Results To Date
Prather Spring Area

Sample ID	Date	Company	Benzene	Toluene	Ethylbenzene	m,p-Xylene	o-xylene	TVH-Gasoline	Methane	TDS	Nitrate	Nitrite	Total Coliform Bacteria	Iron related Bacteria
Cabin #1 Tap	5/31/2008	Williams	U	U	U	U	U	U	U	349 mg/L	2.5H mg/L	U		
Spring	5/31/2008	Williams	U	U	U	U	U	U	U	444 mg/L	1.8H mg/L	U		
Cabin #1 Tap	6/1/2008	Williams	22 µg/L	14 µg/L	U	U	45 µg/L	0.23 mg/L	U	357 mg/L	2.7H mg/L	U		
Spring	6/1/2008	Williams	U	U	U	U	U	U	U	347 mg/L	2.4H mg/L	U		
Cabin #1 Tap	6/2/2008	Williams	1.4 µg/L	U	U	U	67 µg/L	0.31 mg/L	U	354 mg/L	2.5 mg/L	U	0 colonies	~25 cfu/ml
Spring	6/2/2008	Williams	100 µg/L	310 µg/L	U	800 µg/L	210 µg/L	2.6 mg/L	U	382 mg/L	2.6 mg/L	U	0 colonies	~25 cfu/ml
Cabin #1 Tap	6/3/2008	Williams	55 µg/L	170 µg/L	U	220 µg/L	110 µg/L	1.5 mg/L	U	360 mg/L	0.56 mg/L	U	1 colony/100ml	~500 cfu/ml
Spring Inlet Pipe	6/3/2008	Williams	110 µg/L	410 µg/L	U	630 µg/L	170 µg/L	3.7 mg/L	U	356 mg/L	0.47 mg/L	U	0 colonies	~25 cfu/ml
Cabin #1 Discharge Pipe	6/18/2008	Williams	2.6 µg/L	5.3 µg/L	U	2.0 µg/L	13 µg/L							
Cabin #1 Spring Inlet Pipe	6/18/2008	Williams	180 µg/L	700 µg/L	U	1100 µg/L	220 µg/L							
Cabin #2 Piping	6/18/2008	Williams	U	U	U	U	U							
Mid Pt. Inlet & Cabin #1	6/23/2008	Williams	U	2.3 µg/L	U	2.8 µg/L	U				2.6 mg/L	U		
Cabin #1 Discharge Pipe	6/23/2008	Williams	U	U	U	U	U				3.11 mg/L	U		
Cabin #1 Pond Outlet	6/23/2007	Williams	U	U	U	U	U				U	U		
Cabin #1 Spring Inlet Pipe	6/23/2008	Williams	190 µg/L	750 µg/L	U	1100 µg/L	230 µg/L				2.2 mg/L	U		
Mid Pt. Cabin #2 & Pond Outlet	6/23/2008	Williams	U	U	U	U	U				0.39 mg/L	U		
Cabin #2 Piping	6/23/2008	Williams	U	U	U	U	U				3.63 mg/L	U		
Ned's Spring	6/4/2008	COGCC	160 µg/L	580 µg/L		970 µg/L	200 µg/L			380 mg/L				
Ned's Cabin	6/4/2008	COGCC	65 µg/L	180 µg/L		150 µg/L	10 µg/L			360 mg/L	0.53 mg/L			
Second Spring	6/4/2008	COGCC								600 mg/L	0.71 mg/L			
Dick's Spring	6/4/2008	COGCC								370 mg/L	0.97 mg/L			
Donna's Spring	6/4/2008	COGCC								500 mg/L	1.4 mg/L			
Ned's Stock Pond	6/4/2008	COGCC		1.0 µg/L						410 mg/L				
CSOC 697-14 NO. 1 PROD. WTR.	6/4/2008	COGCC	540 µg/L	1200 µg/L		1100 µg/L	210 µg/L			4300 mg/L				
Drinking Water Standard			5 µg/L	0.001 µg/L	0.0007 µg/L	0.01 µg/L*		N/A	N/A	500 mg/L	10 mg/L	1 mg/L	0.05	N/A

µg/L = microgram per liter = ppb

mg/L = milligram per liter = ppm

U = analyte tested for but not detected

* = Total Xylene

Table 1
Summary of Water Quality
Analytical Results To Date
Prather Spring Area

Sample ID	Date	Company	1,2,4-Trimethyl- benzene	1,3,5-Trimethyl- benzene	DRO	Calcium	Iron	Potassium	Magnesium	Manganese	Sodium	Bicarbonate Alkalinity	Total Alkalinity	Chloride (DF)
Cabin #1 Tap	5/31/2008	Williams												
Spring	5/31/2008	Williams												
Cabin #1 Tap	6/1/2008	Williams												
Spring	6/1/2008	Williams												
Cabin #1 Tap	6/2/2008	Williams												
Spring	6/2/2008	Williams												
Cabin #1 Tap	6/3/2008	Williams												
Spring Inlet Pipe	6/3/2008	Williams												
Cabin #1 Discharge Pipe	6/18/2008	Williams												
Cabin #1 Spring Inlet Pipe	6/18/2008	Williams												
Cabin #2 Piping	6/18/2008	Williams												
Mid Pt. Inlet & Cabin #1	6/23/2008	Williams												49.3 mg/L
Cabin #1 Discharge Pipe	6/23/2008	Williams												38.4 mg/L
Cabin #1 Pond Outlet	6/23/2007	Williams												199 mg/L
Cabin #1 Spring Inlet Pipe	6/23/2008	Williams												54.5 mg/L
Mid Pt. Cabin #2 & Pond Outlet	6/23/2008	Williams												120 mg/L
Cabin #2 Piping	6/23/2008	Williams												33.3 mg/L
Ned's Spring	6/4/2008	COGCC	76 µg/L	100 µg/L		58 mg/L			22 mg/L	0.027 mg/L	42 mg/L	230 mg/L	230 mg/L	41 mg/L
Ned's Cabin	6/4/2008	COGCC		58 µg/L		57 mg/L			21 mg/L	0.032 mg/L	40 mg/L	230 mg/L	230 mg/L	35 mg/L
Second Spring	6/4/2008	COGCC				88 mg/L			29 mg/L		52 mg/L	210 mg/L	210 mg/L	160 mg/L
Dick's Spring	6/4/2008	COGCC				55 mg/L			19 mg/L		30 mg/L	230 mg/L	230 mg/L	24 mg/L
Donna's Spring	6/4/2008	COGCC				64 mg/L			24 mg/L		77 mg/L	240 mg/L	240 mg/L	110 mg/L
Ned's Stock Pond	6/4/2008	COGCC				64 mg/L			24 mg/L		44 mg/L	200 mg/L	200 mg/L	91 mg/L
CSOC 697-14 NO. 1 PROD. WTR.	6/4/2008	COGCC	250 µg/L	290 µg/L		110 mg/L	18 mg/L	420 mg/L	7.7 mg/L	0.86 mg/L	1100 mg/L	140 mg/L	140 mg/L	2200 mg/L
Drinking Water Standard														

µg/L = microgram per liter = ppb

mg/L = milligram per liter = ppm

U = analyte tested for but not detected

* = Total Xylene

Table 1
Summary of Water Quality
Analytical Results To Date
Prather Spring Area

Sample ID	Date	Company	Sulfate	Fluoride	Bromide	TDS	Ortho Phosphate as P	pH	Specific Conductance
Cabin #1 Tap	5/31/2008	Williams							
Spring	5/31/2008	Williams							
Cabin #1 Tap	6/1/2008	Williams							
Spring	6/1/2008	Williams							
Cabin #1 Tap	6/2/2008	Williams							
Spring	6/2/2008	Williams							
Cabin #1 Tap	6/3/2008	Williams							
Spring Inlet Pipe	6/3/2008	Williams							
Cabin #1 Discharge Pipe	6/18/2008	Williams							
Cabin #1 Spring Inlet Pipe	6/18/2008	Williams							
Cabin #2 Piping	6/18/2008	Williams							
Mid Pt. Inlet & Cabin #1	6/23/2008	Williams							
Cabin #1 Discharge Pipe	6/23/2008	Williams							
Cabin #1 Pond Outlet	6/23/2007	Williams							
Cabin #1 Spring Inlet Pipe	6/23/2008	Williams							
Mid Pt. Cabin #2 & Pond Outlet	6/23/2008	Williams							
Cabin #2 Piping	6/23/2008	Williams							
Ned's Spring	6/4/2008	COGCC	48 mg/L			380 mg/L		7.6	660 umhos/cm
Ned's Cabin	6/4/2008	COGCC	45 mg/L			360 mg/L		7.7	630 umhos/cm
Second Spring	6/4/2008	COGCC	43 mg/L		0.78 mg/L	600 mg/L		7.8	950 umhos/cm
Dick's Spring	6/4/2008	COGCC	35 mg/L			370 mg/L		7.7	570 umhos/cm
Donna's Spring	6/4/2008	COGCC	49 mg/L		0.47 mg/L	500 mg/L		7.8	870 umhos/cm
Ned's Stock Pond	6/4/2008	COGCC	41 mg/L		0.43 mg/L	410 mg/L		8.2	760 umhos/cm
CSOC 697-14 NO. 1 PROD. WTR.	6/4/2008	COGCC		25 mg/L	8.4 mg/L	430 mg/L	11 mg/L	6.7	7300 umhos/cm
Drinking Water Standard									

µg/L = microgram per liter = ppb

mg/L = milligram per liter = ppm

U = analyte tested for but not detected

* = Total Xylene