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COMPREHENSIVE ASSESSMENT REPORT

**TEXAS - NEW MEXICO PIPELINE COMPANY
MONUMENT SITE NO. 3
LEA COUNTY, NEW MEXICO**



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COMPREHENSIVE ASSESSMENT REPORT

**MONUMENT SITE NO. 3
LEA COUNTY, NEW MEXICO**

PREPARED FOR:

TEXAS - NEW MEXICO PIPELINE COMPANY

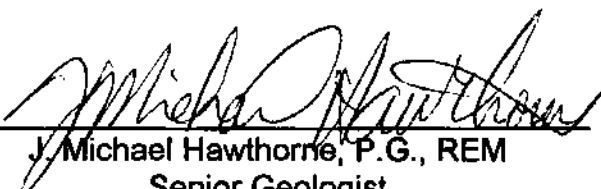
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EXECUTIVE SUMMARY

This report summarizes the results of subsurface assessment activities conducted at Monument Site No. 3, located in Lea County, New Mexico. Site No. 3 includes four separate areas of investigation designated as Site Nos. 3, 3A, 3B, and 3C. Activities were performed in general accordance with the work plan submitted with the Phase I - Preliminary Site Characterization Report and approved by the State of New Mexico Oil Conservation Division.

Field activities associated with the subsurface assessment consisted of advancing five soil borings for the collection of native soil samples for field screening and laboratory analysis. A sensitive receptor survey/migration pathway evaluation was also conducted.

Results of the assessment included the following:

- Soil analytical results indicated the presence of toluene, ethylbenzene, xylenes and total petroleum hydrocarbons (TPH) at concentrations noted within the report. Benzene was not detected.
- Ground water was not encountered during the subsurface assessment.
- Observed impact to soils from petroleum hydrocarbons extended from the ground surface to 14 feet below ground surface.
- Soils at Site 3A require remediation.

Recommended additional assessment and remediation activities to be conducted pursuant to final site closure include:

- Excavate impacted material as required to bring residual hydrocarbon concentrations to closure levels.
- Obtain OCD approval and transport excavated soil to an off-site landfarm.
- Backfill excavation with clean fill.
- Prepare closure report.

INTRODUCTION

This report summarizes assessment activities conducted in response to suspected crude oil impact at Monument Site No. 3, located in Lea County New Mexico. Site No. 3 consisted of four separate areas of investigation designated as Site Nos. 3, 3A, 3B, and 3C. Details of each site are presented on FIGs. 2, 3, 4, and 5. A site location map is presented as FIG. 1. Descriptions of each of the areas investigated are as follows:

- Site No. 3 consists of an excavation approximately 38 feet long, 24 feet wide, and 5 feet deep; a stockpile of soils recovered from the excavation; and a surface stain along a section of pipeline adjacent to the excavation.
- Site No. 3A consists of an excavation approximately 63 feet long, 27 feet wide, and 2 feet deep and a stockpile of soils recovered from the excavation.
- Site No. 3B consists of an excavation approximately 90 feet wide, 70 feet long, and 2 feet deep and a stockpile of soils recovered from the excavation.
- Site No. 3C consists of an excavation approximately 40 feet wide, 25 feet long, and 6 feet deep and a stockpile of soils recovered from the excavation.

A scope of work for the subsurface assessment was prepared based upon field observations obtained during a preliminary investigation of surface site conditions. The proposed work plan was presented in the Phase I - Preliminary Site Characterization report dated June 21, 1996, and was approved by the State of New Mexico Oil Conservation Division in a letter dated August 16, 1996. The general scope of work for the subsurface investigation included:

- A sensitive receptor survey, migration pathway evaluation, and registered water well search.
- Soil borings within the excavations at each of the 4 sites described above.

SUBSURFACE INVESTIGATION

SENSITIVE RECEPTOR SURVEY/MIGRATION PATHWAY EVALUATION

A sensitive receptor survey/migration pathway evaluation was conducted at the site. No potential receptors were identified within a 500-foot radius of the site. Adjacent properties consisted of vacant range land to the north and east, a gas plant to the south, and a concrete batch plant to the west. An abandoned oil well was located approximately 400 feet to the southeast.

A search of State of New Mexico water well registrations indicated two registered water wells within a .5-mile radius of the site. A copy of the well registration data is presented in APPENDIX A. Approximate locations of the identified wells are presented on FIG. 1.

Migration Pathway Evaluation

Potential manmade migration pathways identified during the survey included the former location of a TNMPL pipeline extending north to south through the center of the site and an existing petroleum product pipeline extending east to west approximately 60 feet to the south.

Ground water was not observed during the assessment. Surface flow at the site is to the southeast.

FIELD ACTIVITIES

On March 5 and 6, 1997 soil borings B3-1, B3A-1, B3B-1, B3C-1 and B3C-2 were advanced utilizing a direct-push hydraulic sampling system. On April 2, 1997 Soil Boring B3AT-1 was advanced utilizing a tricone sampling system. The soil borings were advanced to depths ranging from 11 to 17 feet bgs. Field observations obtained during the soil boring advancement included the following:

- Ground water was not observed during soil boring advancement.
- Hydrocarbon impact extends from the ground surface to the total depth of each exploratory hole within each of the areas investigated.
- Hydrocarbon impact to vadose zone soils has been vertically delineated to concentrations which do not appear to require remediation.

Upon completion of sampling activities, each soil boring was backfilled to the ground surface with a cement/bentonite grout. Approximate locations of the soil borings are presented on FIGs. 2 through 5.

SOIL ASSESSMENT

The subsurface profile was classified in general accordance with the Unified Soil Classification System by visually observing soil samples obtained during drilling. In general, one soil type and limestone bedrock were encountered. A general description, approximate thickness, and head-space results of the soil type is discussed as follows:

Soil Type 1

This soil type consisted of a tan gravel with a high calcareous content (caliche) encountered at all soil boring locations. The gravel was silty and dry to moist. This soil type was encountered from the ground surface to the maximum depth investigated, approximately 17 feet bgs. Head-space readings ranged from below instrument detection limits (ND) to 48 ppm.

Limestone

A hard, grey limestone was encountered as sampler refusal at the bottom of soil borings B3A-1, B3B-1, and B3C-2 and beneath the upper clay at B3AT-1 to a depth of approximately 15 feet bgs. The limestone was encountered continuously from a depth of 0.5 feet to 15 feet bgs at B3AT-1. Head-space readings obtained from samples of the limestone were all ND.

Graphic logs indicating the subsurface soil profile, depths at which soil samples were obtained, head-space results, laboratory results, and the soil boring details are presented on FIGS. 6 and 7.

LABORATORY ANALYSIS

Soil samples were selected for laboratory analysis from sample intervals that, at a minimum, represented the high field screening result and the bottom of the hole of each soil boring. The selected soil samples were express mailed to Xenco Laboratories in San Antonio, Texas for determination of TPH concentrations by EPA METHOD 418.1 and BTEX concentrations by EPA Method SW846-8020.

Analytical results indicated the following range of constituent concentrations for the soil boring samples:

CONSTITUENT	RANGE OF CONCENTRATIONS
TPH	26.5 to 2830 mg/kg
Benzene	ND
BTEX	ND to 0.706 mg/kg

A complete summary of analytical results for soil samples is presented in TABLE I. Copies of the certified laboratory reports and chain-of-custody documentation for soils are presented in APPENDIX B.

WASTE MANAGEMENT

Cuttings generated during soil boring advancement were placed in the existing stockpiles.

QA/QC PROCEDURES

DECONTAMINATION OF EQUIPMENT

Cleaning of drilling equipment was the responsibility of the drilling company. In general, the cleaning procedures consisted of using high pressure steam to wash the equipment prior to drilling and prior to starting each hole. Prior to each use, the sampling equipment was cleaned with Liqui-Nox detergent and rinsed with distilled water.

SOIL SAMPLING

Samples of the subsurface soils were obtained utilizing a direct-push continuous sampling device. Representative soil samples were divided into two separate portions using clean, disposable gloves and clean sampling tools. One portion of the soil sample was placed in a disposable sample bag. The bag was labeled and sealed for head-space analysis using a photo-ionization detector (PID) calibrated to a 100 ppm isobutylene standard. Each sample was allowed to volatilize for approximately 30 minutes at ambient temperature prior to conducting the analysis.

The other portion of the soil sample was placed in a sterile glass container equipped with a Teflon-lined lid furnished by the analytical laboratory. The container was filled to capacity to

limit the amount of head-space present. Each container was labeled and placed on ice in an insulated cooler. Upon selection of samples for analysis, the cooler was sealed for shipment to the laboratory. Proper chain-of-custody documentation was maintained throughout the sampling process.

LABORATORY PROTOCOL

The laboratory was responsible for proper QA/QC procedures. These procedures are either transmitted with the laboratory reports or are on file at the laboratory.

CONCLUSIONS

The following conclusions are presented based on the field observations, drilling activities, and soil laboratory results:

- Soil impact extends from the ground surface to approximately 14 feet bgs.
- Standard New Mexico Oil and Conservation Division regulatory site closure concentrations for soils were exceeded by TPH concentrations in a sample collected from Soil Boring B3A-1.
- Hydrocarbon impact to vadose zone soils has been vertically delineated at each of the Site No. 3 areas of investigation to concentrations which do not appear to require remediation.

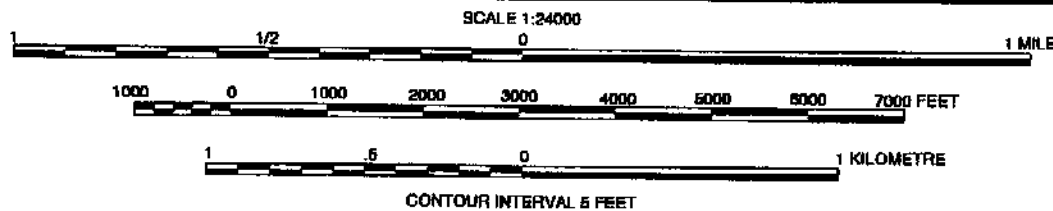
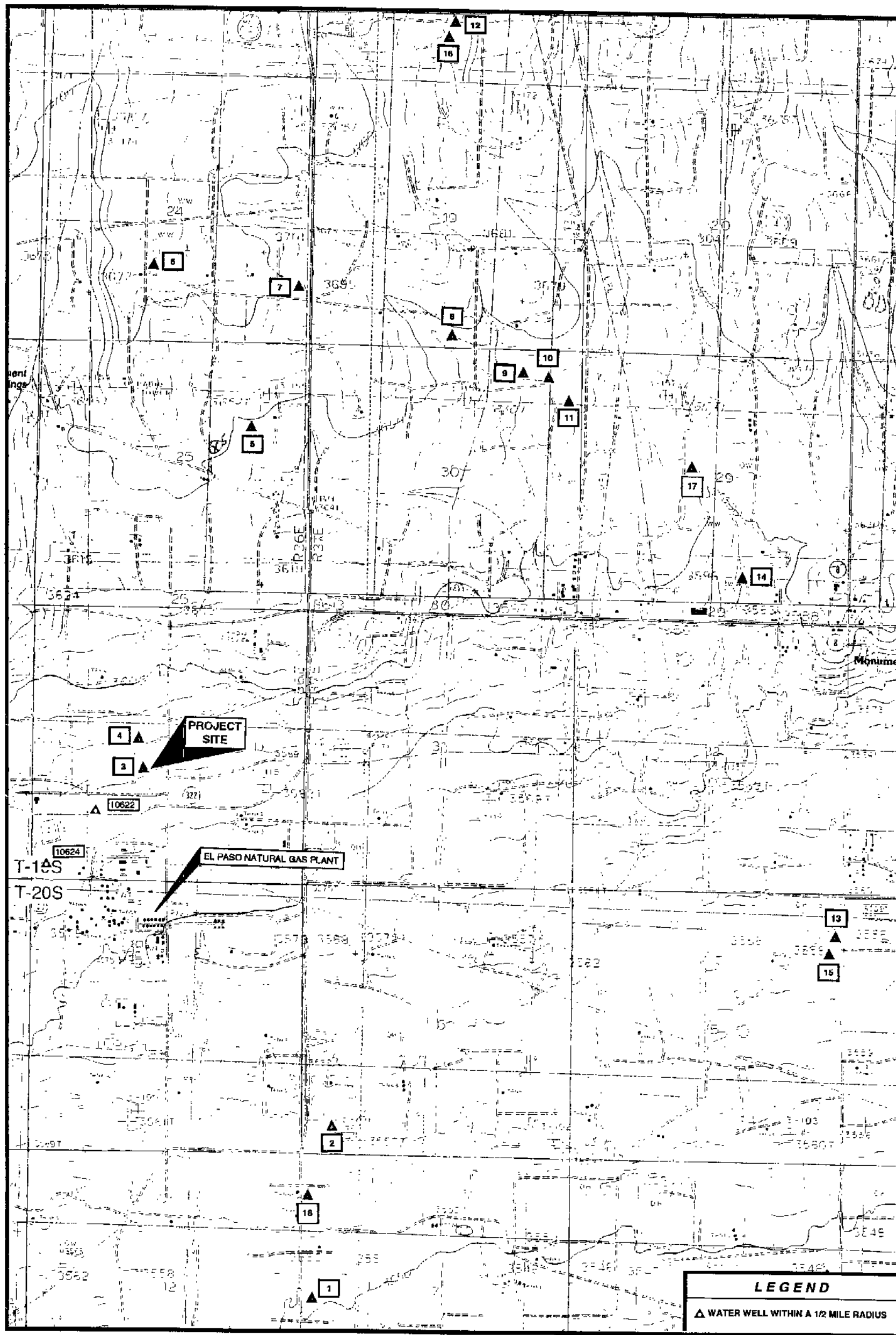
RECOMMENDATIONS

Recommendations for remediation of observed soil impact at the site consist of the following:

- Excavate impacted material as required to bring residual hydrocarbon concentrations to closure levels.
- Obtain OCD approval and transport impacted soil to an off-site landfarm.
- Backfill excavation with clean fill.
- Prepare closure report.

MONUMENT NORTH QUADRANGLE
 NEW MEXICO - LEA COUNTY
 PRINTED 1985

MONUMENT SOUTH QUADRANGLE
 NEW MEXICO - LEA COUNTY
 PRINTED 1985



SITE LOCATION MAP

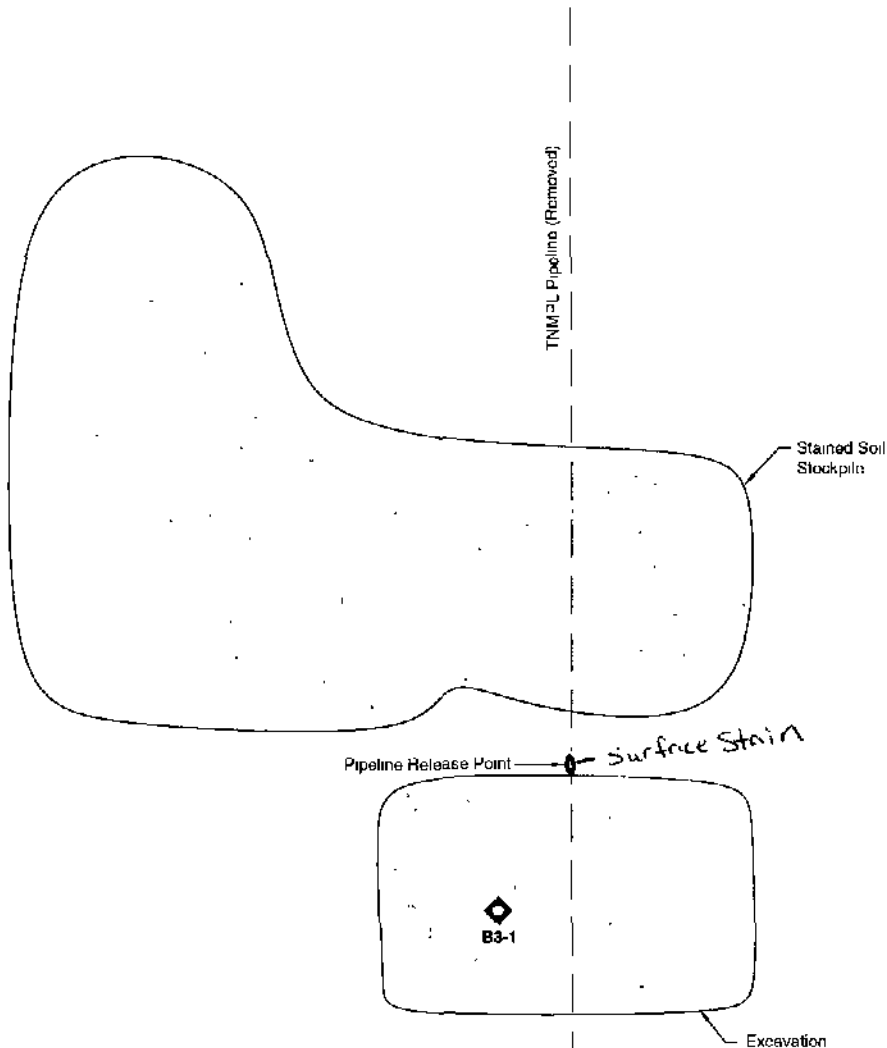
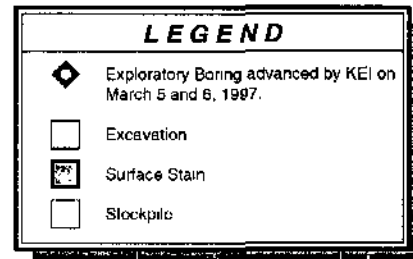
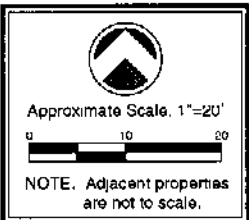
TEXAS - NEW MEXICO PIPE LINE CO.

MONUMENT SITE NO. 3

LEA COUNTY, NEW MEXICO

610057

FIG 1



DIRT ROAD

06-1497-RM C-10152SPJ

kei

SITE DETAILS

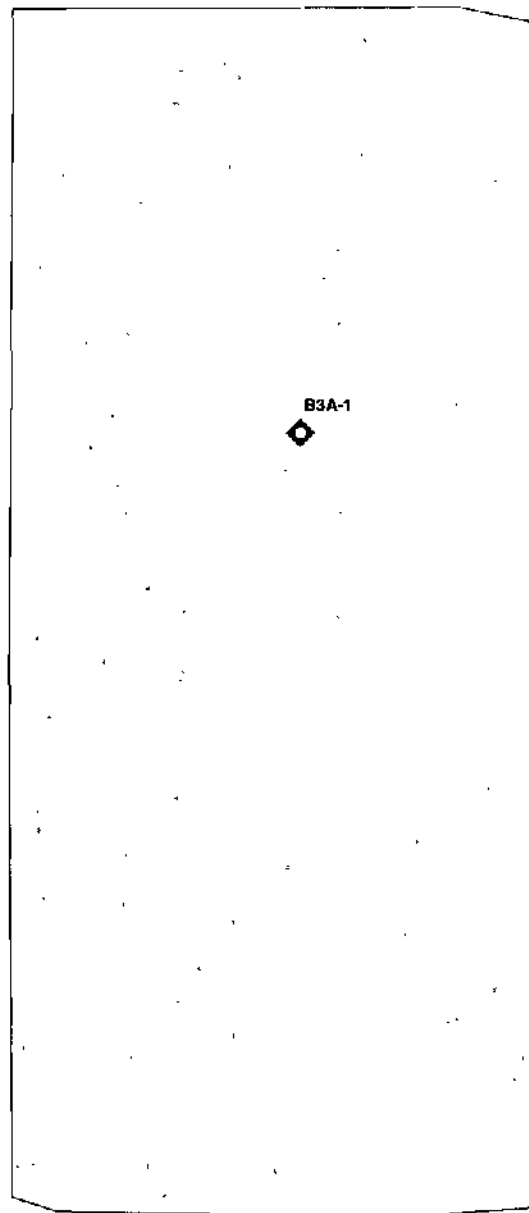
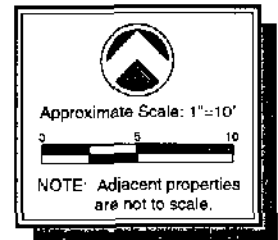
TEXAS - NEW MEXICO PIPE LINE CO.

MONUMENT SITE NO. 3

LEA COUNTY, NEW MEXICO

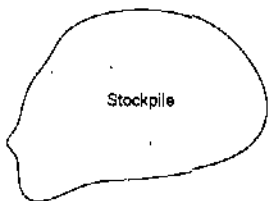
610057

FIG 2



B3AT-1

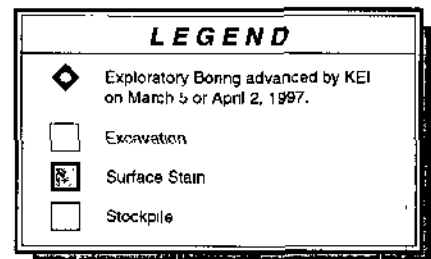
Limits of Excavation



Stockpile

Pipeline Release Point

Surface Stain



001497-RM G3(6/15/SP3A)



SITE DETAILS

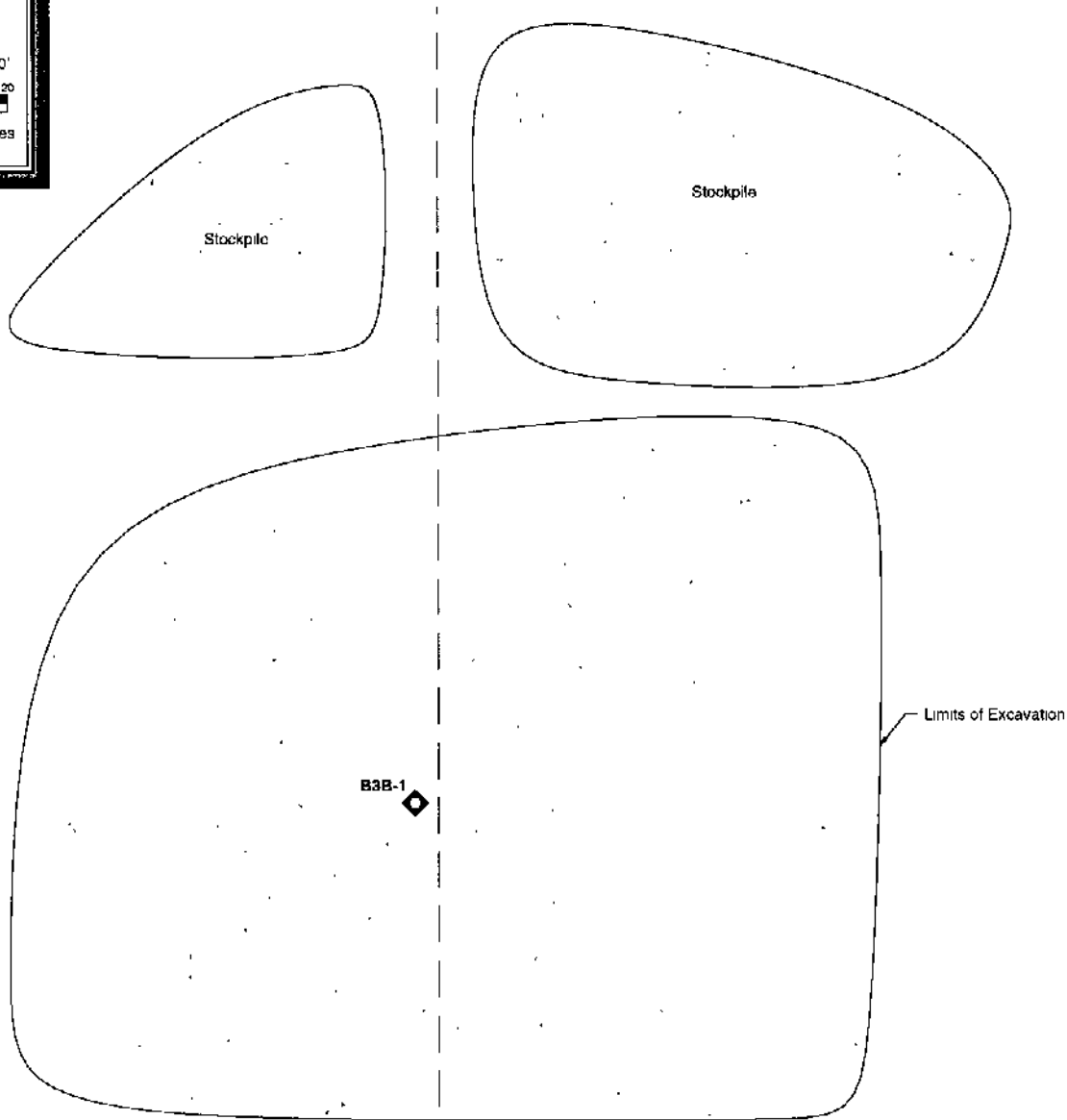
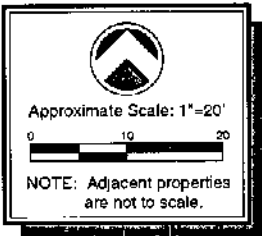
TEXAS - NEW MEXICO PIPE LINE CO.

MONUMENT SITE NO. 3A

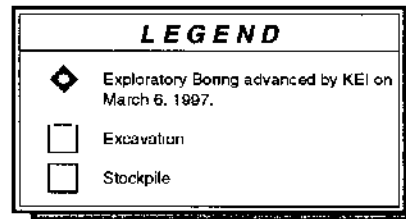
LEA COUNTY, NEW MEXICO

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FIG 3



EASEMENT



09/14/97 RIM 13/00175(P380)



SITE DETAILS

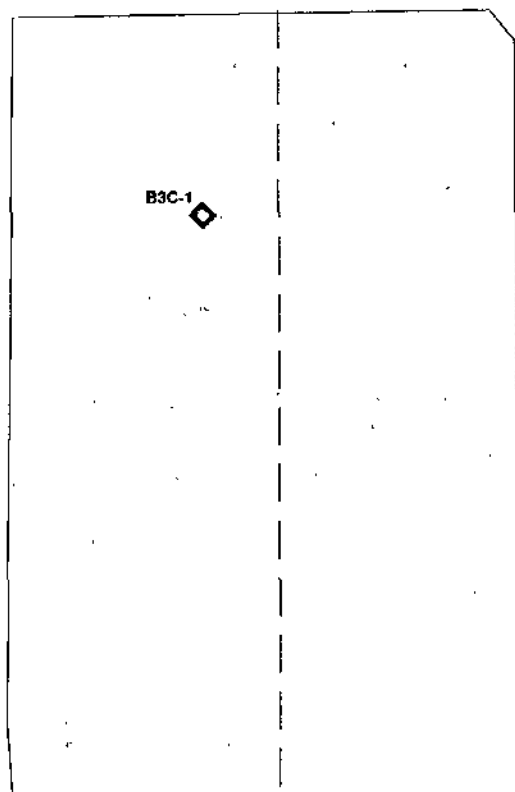
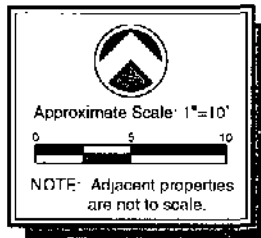
TEXAS - NEW MEXICO PIPE LINE CO.

MONUMENT SITE NO. 3B

LEA COUNTY, NEW MEXICO

610057

FIG 4



Limits of Excavation

B3C-2

TNMPL Pipeline

LEGEND	
	Exploratory Boring advanced by KEI on March 5, 1997.
	Excavation

08/21/97 RM 13 V81057F5



SITE DETAILS		
TEXAS - NEW MEXICO PIPE LINE CO.	MONUMENT SITE NO. 3C	LEA COUNTY, NEW MEXICO

610057
FIG 5

LEGEND



Gravel (GM), silty gravel-sand-silt mixtures, calcareous (caliche), moist to dry, tan.



Limestone; hard, light grey.



Indicates the depth interval from which a soil sample was selected and prepared for field head-space and/or laboratory analysis. The soil samples were obtained continuously by advancing a plastic lined four-foot sampling barrel.



Indicates sample selected for laboratory analysis.



Indicates sampler refusal.

B = benzene concentration (mg/kg)
 BTEX = total BTEX concentration (mg/kg)
 TPH = total petroleum hydrocarbon concentration (mg/kg)

PID Head-space readings in ppm obtained with a photoionization detector.

ND = Indicates the concentration was below laboratory detection limits.

NOTES:

1. Borings B3-1, B3A-1, B3B-1, B3C-1, and B3C-2 were advanced utilizing a direct-push sampling system on March 5 and 6, 1997. Boring B3AT-1 was advanced on April 2, 1997 utilizing a 6" tricone sampling system.
2. No ground water was encountered during boring advancement.
3. The lines between material types shown on the profile log represent approximate boundaries. Actual transitions may be gradual.
4. The depths indicated are referenced from the ground surface.
5. The soil borings were grouted to the ground surface with cement grout containing 5 percent bentonite.

08/28/97-RM G:\610057\1

kei

LEGEND AND NOTES FOR SOIL BORINGS

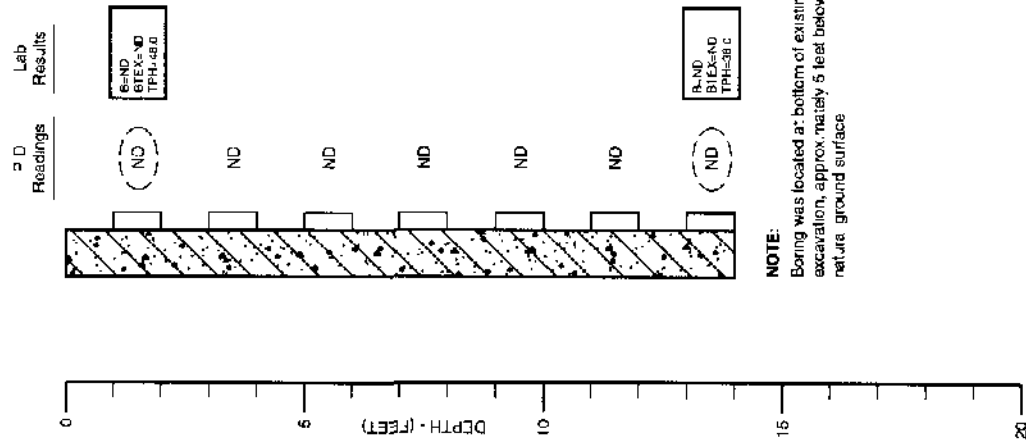
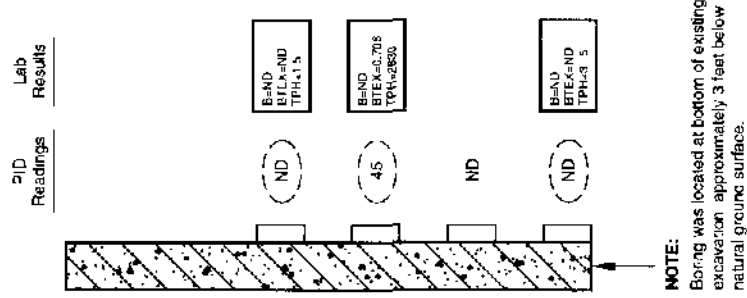
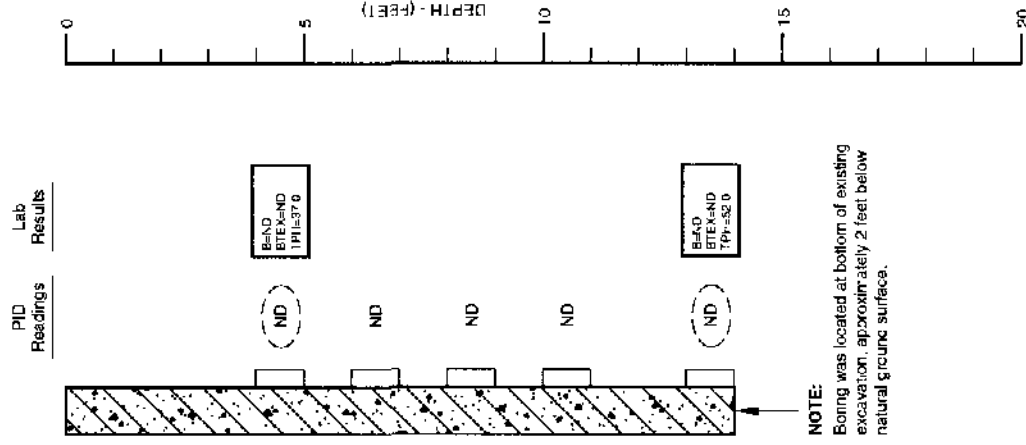
TEXAS - NEW MEXICO PIPE LINE CO.

MONUMENT SITE NO. 3

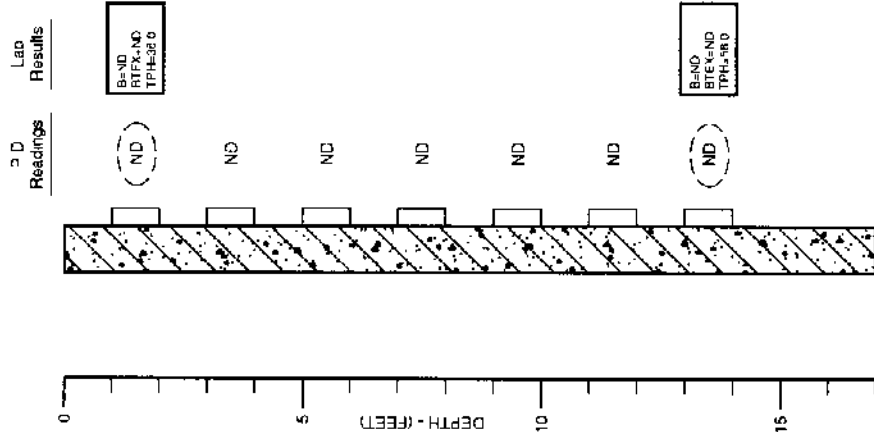
LEA COUNTY, NEW MEXICO

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FIG 6

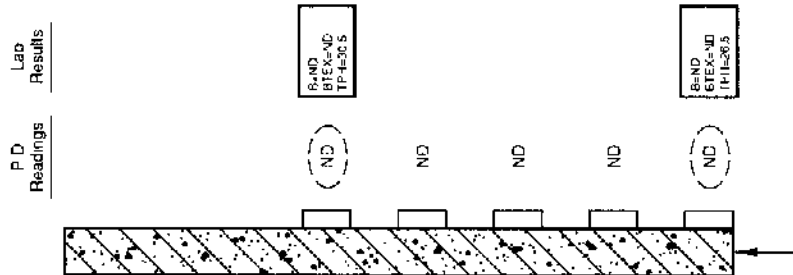
B3-1**B3A-1****B3B-1**

B3C-1

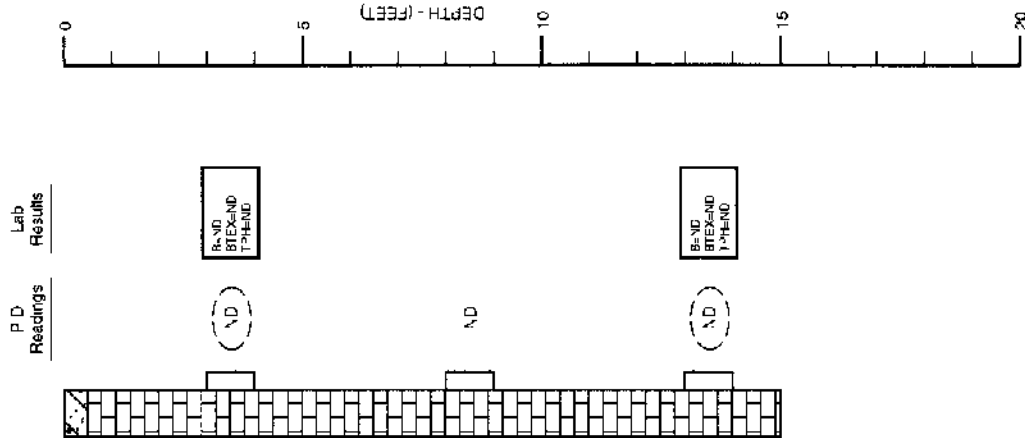


NOTE:
Bor rig was located at bottom of existing excavation, approximately 6 feet below natural ground surface.

B3C-2



B3AT-1



GENERAL NOTES

ND - Indicates constituent was not detected above the method detection limit.

Depth is referenced from ground surface.

Method detection limit

Benzene	-	0.020 to 0.050 mg/kg
Toluene	-	0.020 to 0.050 mg/kg
Ethylbenzene	-	0.020 to 0.050 mg/kg
Xylene	-	0.060 to 0.150 mg/kg
BTEX	-	0.120 to 0.300 mg/kg
TPH	-	10 mg/kg

Laboratory testing method

BTEX	-	EPA Method SW846-8020
TPH	-	EPA Method 418.1

TABLE I

**SUMMARY OF LABORATORY BTEX/TPH RESULTS - SOIL
MONUMENT SITE NO. 3
LEA COUNTY, NEW MEXICO**

SAMPLE LOCATION	SAMPLE DATE	DEPTH (feet)	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL-BENZENE (mg/kg)	XYLENES (mg/kg)	TOTAL BTEX (mg/kg)	TPH (mg/kg)
B3-1	03/05/97	1-2	ND	ND	ND	ND	ND	48.0
	03/05/97	13-14	ND	ND	ND	ND	ND	38.0
B3A-1	03/05/97	4-5	ND	ND	ND	ND	ND	49.5
	03/05/97	6-7	ND	0.135	0.082	0.489	0.706	2830
	03/05/97	10-11	ND	ND	ND	ND	ND	31.5
B3B-1	03/06/97	4-5	ND	ND	ND	ND	ND	37.0
	03/06/97	13-14	ND	ND	ND	ND	ND	52.0
B3C-1	03/05/97	1-2	ND	ND	ND	ND	ND	36.0
	03/05/97	13-14	ND	ND	ND	ND	ND	56.0
B3C-2	03/05/97	5-6	ND	ND	ND	ND	ND	30.5
	03/05/97	13-14	ND	ND	ND	ND	ND	26.5
3AT-1	04/02/97	3	ND	ND	ND	ND	ND	ND
	04/02/97	13	ND	ND	ND	ND	ND	ND

10601 L 02974	07 25 1953 PMT DOM	195 36E 20	121 195 36E 30 0573 65	HUGHES LARRY BENNETT	0.00 0.00 0
10605 L 02974	01 07 1953 LIC FOR SHR	195 36E 20	121 195 36E 30 0573 65	HUGHES LARRY BENNETT	0.00 0.00 0
10606 L 02974	10 31 1957 LIC FOR SHR	195 36E 20	122 195 36E 30 0572 65	HUGHES LARRY BENNETT	0.00 0.00 0
10607 L 02974	07 14 1947 PMT NOT	195 36E 30	251 195 36E 30 0564 65	JOHNSON E H	0.00 0.00 0
10610 L 00011	04 00 1953 DOC FOR	195 36E 32	113 195 36E 32 0564 65	JOHNSON E H	0.00 0.00 0
10611 L 03003	05 25 1979 PMT DOM	195 36E 32	350 195 36E 32 0579 65	JOHNSON E H	0.00 0.00 0
10612 L 00512	02 26 1948 LIC FOR SHR	195 36E 32	3212 195 36E 32 1191 65	HUGHES LARRY BENNETT	0.00 0.00 0
10613 L 00517 S	02 25 1953 PMT FOR SHR	195 36E 32	3212 195 36E 32 1191 65	HUGHES LARRY BENNETT	0.00 0.00 0
10614 L 00286	06 12 1950 PMT DOM	195 36E 32	3212 195 36E 32 0534 65	HUGHES LARRY BENNETT	0.00 0.00 0
10615 L 07543	09 21 1953 DOM FOR	195 36E 33	11 195 36E 33 0533 65	KLEIN FAYE L	0.00 0.00 0
10616 L 05114	02 27 1956 PMT DOM	195 36E 34	210 195 36E 34 0564 65	JOHNSON E H	0.00 0.00 0
10617 L 00000	10 00 1977 PMT DOM	195 36E 34	4440 195 36E 34 1279 65	JOHNSON E H	0.00 0.00 0
10618 L 04755	11 03 1961 PMT EXR	195 36E 35	200 195 36E 35 0772 65	CLINICAL CHEMICAL CO	0.00 0.00 0
10619 L 07921	07 11 1958 PMT EXR	195 36E 35	240 195 36E 35 0564 65	MUSICK J E	0.00 0.00 0
10620 L 04715	09 06 1961 PMT EXR	195 36E 35	430 195 36E 35 1264 65	CLINICAL CHEMICAL CO	0.00 0.00 0
10621 L 04755	11 03 1961 PMT EXR	195 36E 35	440 195 36E 35 0772 65	CLINICAL CHEMICAL CO	0.00 0.00 0
10622 L 04716	09 06 1961 PMT EXR	195 36E 35	500 195 36E 35 1064 65	CLINICAL CHEMICAL CO	0.00 0.00 0
10623 L 01270	10 18 1951 PMT NOT	195 36E 35	442 195 36E 35 0564 65	SULF OIL CORP	0.00 0.00 0
10624 L 01267	10 15 1951 PMT NOT	195 36E 35	444 195 36E 35 0564 65	SULF OIL CORP	0.00 0.00 0
10625 L 01840 S2	02 24 1967 PMT REC	195 37E 01	2121 195 37E 01 0672 64	HOBBS COUNTRY CLUB	0.00 0.00 0
10627 L 01840 E	03 07 1965 LIC REC	195 37E 01	2134 195 37E 01 0779 64	HOBBS COUNTRY CLUB	27.16 81.48 58
10628 L 01842	01 21 1953 LIC REC	195 37E 01	2134 195 37E 01	HOBBS COUNTRY CLUB	0.00 0.00 0
10629 L 01843	01 21 1953 LIC REC	195 37E 01	222 195 37E 01 0664 64	HOBBS COUNTRY CLUB	0.00 0.00 0
10630 L 01841	01 21 1953 LIC REC	195 37E 01	231 195 37E 01 0779 64	HOBBS COUNTRY CLUB	0.00 0.00 0
10631 L 01840 S	03 07 1965 PMT REC	195 37E 01	234 195 37E 01 0779 64	HOBBS COUNTRY CLUB	0.00 0.00 0
10632 L 01844	01 21 1953 PMT NOT	195 37E 01	410 195 37E 01 0664 64	HOBBS COUNTRY CLUB	0.00 0.00 0
12135 L 09759	08 29 1985 PMT DOM	195 37E 01	401 195 37E 01 0664 64	BOY SCOUTS OF AMERICA	0.00 0.00 0
10633 L 02182	04 27 1953 PMT DOM	195 37E 01	412 195 37E 01 0664 64	BOY SCOUTS OF AMERICA	0.00 0.00 0
10634 L 02193	06 02 1955 PMT DOM	195 37E 01	412 195 37E 01 0664 64	BOY SCOUTS OF AMERICA	0.00 0.00 0
10635 L 02193	01 21 1957 LIC REC	195 37E 01	5142 195 37E 01 1194 64	HOBBS COUNTRY CLUB	72.01 219.03 123

ANALYTICAL REPORT 1-70560

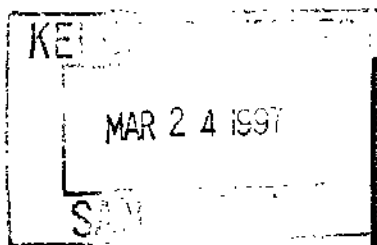
for

K.E.I. Consultants, Inc.

Project Manager: Ann Baker

Project Name: TNMPL Monument

March 12, 1997



HOUSTON - DALLAS - SAN ANTONIO

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March 12, 1997

Project Manager: Ann Baker
K.E.I. Consultants, Inc.
5309 Wurzbach Rd., Suite 100
San Antonio, TX 78238

Reference: **XENCO Report No.: 1-70560**
Project Name: TNMPL Monument
Project ID: 610057-2-3,3A,3B,3C
Project Address: Sites 3,3A,3B,3C

Dear Ann Baker:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with XENCO Chain of Custody Number 1-70560. All results being reported to you apply only to the samples analyzed, properly identified with a Laboratory ID number. This letter documents the official transmission of the contents of the report and validates the information contained within.

All the results for the quality control samples passed thorough examination. Also, all parameters for data reduction and validation checked satisfactorily. In view of this, we are able to release the analytical data for this report within acceptance criteria for accuracy, precision, and completeness.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 3 years in our archives and after that time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in COC No. 1-70560 will be filed for 60 days, and after that time they will be properly disposed of without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

XENCO Laboratories is accredited by the American Association for Laboratory Accreditation (A2LA) for technical competence in the field of Environmental Testing (Certificate No. 0343-01). In accordance with A2LA's guidelines, XENCO operates a Quality System that meets ISO/IEC Guide 25 requirements and is strictly implemented and enforced through our standard QA/QC procedures.

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

Sincerely,


Eddie Y. Nemoto, Ph.D.
QA/QC Manager

Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.
Certified in California, Oklahoma, Kansas, Arkansas, and approved by numerous other States and Agencies.
A Small Business and Minority Status Company that delivers SERVICE and QUALITY!



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CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST FORM

Page 1 of 2

Lab. Batch # 170560-SA

Contractor YET Consultants		Phone (210) 680-3767		No. coolers this shipment:		Contractor COC # 0005													
Address 5309 Wimbach, Ste 100, San Antonio TX 78238				Carrier:		Quote #:													
Project Name TNMPM Monument		Project Director Paul Hartnett		Airtail No.		P.O. No. 7172													
Project Location Sites 3, 3A, 3B, 3C		Project Manager Anna Barker																	
Sample Signature Brian Siegfried		Project No. 610057-2-3, 3A, 3B, 3C																	
SAMPLE CHARACTERIZATION																			
Field ID	Date	Time	Depth	Diameter	S.O.T.	W.A.T.	C.O.M.P.	G.R.A.B.	Container Size Type P.G.	Is Other	Preservative	Utl Dies Kcr Unknown	PIT No.	Waste Oil	Sample Description	Tank No.	CONTAINERS		
																	No	Total	
B3-1 1-2	3/15/97	1545	12	X					402	G	X				B3-1, 1-2		1	X	
B3-1 13-14		1615	13						402						B3-1, 13-14		1		
B3A-1 4-5		1510	4						402						B3A-1, 4-5		1		
B3A-1 6-7		1510	6						402						B3A-1, 6-7		1		
B3A-1 6-7		1510	6						802						B3A-1, 6-7		1		
B3A-1 10-11		1525	10						402						B3A-1, 10-11		1	X	
B3B-1 4-5	3/16/97	1545	4						402						B3B-1, 4-5		1		
B3B-1 13-14		1555	13						402						B3B-1, 13-14		1		
B3C-1 1-2	3/15/97	1550	1						402						B3C-1, 1-2		1		
B3C-1 13-14		1115	13						402						B3C-1, 13-14		1		
																		Remarks	
																		Call w. the highest TPT result	

PK (Contractor), Yellow & White (Lab)

* Pre-scheduling is recommended

Precision Analytical Services



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CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST FORM

Page 2 of 2

Lab. Batch # 170500SA

Contractor KEL CONSULTANTS		Phone (713) 680-3767		No. of CONTAINERS		No. of this shipment		Contractor COC # 0005	
Address 5309 Warzbach, Ste 100, San Antonio, TX 78238		Carrier		Airball No.		Quote #		POA No: 7172	
Project Name TAMUPL Monument		Project Director Paul Hartnett		Project Manager Ann Baker		Project No. 610057-2-3,3A,3B,3C		Turn-around • ASAP • 24 hrs • 48 hrs Standard	
Project Location Sites 3, 3A, 3B, 3C		Project No. 610057-2-3,3A,3B,3C		Project No. 610057-2-3,3A,3B,3C		Project No. 610057-2-3,3A,3B,3C		Remarks	
Sample Signature Brian Siegfried		Sample Description		Tank No.		Sample Description		Remarks	
Field ID		Date		Time		Container		Remarks	
1 B30-2 5-12		3/5/97		1400		402 G		X	
2 B30-2 13-14		3/6/97		1450		402 G		X	
3									
4									
5									
6									
7									
8									
9									
10									

Relinquished by (Signature)		DATE		TIME		Received by (Signature)		DATE		TIME		Remarks	
Brian Siegfried		3/6/97		1000		Ann Baker		3/7/97		1005		Call with highest TPH result	
Ann Baker		3/7/97		1010		Ann Baker		3/7/97		1010			

PK (Contractor), Yellow & White (Lab).

Pre-scheduling is recommended

Precision Analytical Services



ANALYTICAL CHAIN OF CUSTODY REPORT CHRONOLOGY OF SAMPLES

K.E.I. Consultants, Inc.

Project ID: 610057-2-3,3A,3B,3C
Project Manager: Ann Baker
Project Location: Sites 3,3A,3B,3C

Project Name: TNMPL Monument

XENCO COC#: 1-70560

Date Received in Lab: Mar 7, 1997 10:10 by CB

XENCO contact : Carlos Castro/Edward Yonemolo

Field ID		Lab. ID	Method Name	Method ID	Units	Turn Around	Sample Collected	Addition Requested	Extraction	Analysis
1 B3-1(1-2)		170560-001	BTEX	SW-846	ppm	Standard	Mar 5, 1997 15:45		Mar 10, 1997 by CB	Mar 10, 1997 22:53 by CB
2			TPH	EPA 418.1	ppm	Standard	Mar 5, 1997 15:45		Mar 10, 1997 by HL	Mar 10, 1997 17:23 by HL
3 B3-1(13-14)		170560-002	BTEX	SW-846	ppm	Standard	Mar 5, 1997 16:15		Mar 10, 1997 by CB	Mar 10, 1997 23:10 by CB
4			TPH	EPA 418.1	ppm	Standard	Mar 5, 1997 16:15		Mar 10, 1997 by HL	Mar 10, 1997 17:26 by HL
5 B3A-1(4-5)		170560-003	BTEX	SW-846	ppm	Standard	Mar 5, 1997 15:10		Mar 10, 1997 by CB	Mar 10, 1997 23:28 by CB
6			TPH	EPA 418.1	ppm	Standard	Mar 5, 1997 15:10		Mar 10, 1997 by HL	Mar 10, 1997 17:29 by HL
7 B3A-1(6-7)		170560-004	BTEX	SW-846	ppm	Standard	Mar 5, 1997 15:10		Mar 11, 1997 by CB	Mar 11, 1997 11:57 by CB
8			TPH	EPA 418.1	ppm	Standard	Mar 5, 1997 15:10		Mar 10, 1997 by HL	Mar 10, 1997 17:34 by HL
9 B3A-1(10-11)		170560-006	BTEX	SW-846	ppm	Standard	Mar 5, 1997 15:25		Mar 10, 1997 by CB	Mar 10, 1997 23:45 by CB
10			TPH	EPA 418.1	ppm	Standard	Mar 5, 1997 15:25		Mar 10, 1997 by HL	Mar 10, 1997 17:37 by HL
11 B3B-1(4-5)		170560-007	BTEX	SW-846	ppm	Standard	Mar 6, 1997 08:45		Mar 10, 1997 by CB	Mar 11, 1997 00:03 by CB
12			TPH	EPA 418.1	ppm	Standard	Mar 6, 1997 08:45		Mar 10, 1997 by HL	Mar 10, 1997 17:41 by HL
13 B3B-1(13-14)		170560-008	BTEX	SW-846	ppm	Standard	Mar 6, 1997 08:55		Mar 10, 1997 by CB	Mar 11, 1997 00:20 by CB
14			TPH	EPA 418.1	ppm	Standard	Mar 6, 1997 08:55		Mar 10, 1997 by HL	Mar 10, 1997 17:44 by HL
15 B3C-1(1-2)		170560-009	BTEX	SW-846	ppm	Standard	Mar 5, 1997 10:50		Mar 10, 1997 by CB	Mar 11, 1997 00:37 by CB
16			TPH	EPA 418.1	ppm	Standard	Mar 5, 1997 10:50		Mar 10, 1997 by HL	Mar 10, 1997 17:47 by HL
17 B3C-1(13-14)		170560-010	BTEX	SW-846	ppm	Standard	Mar 5, 1997 11:15		Mar 10, 1997 by CB	Mar 11, 1997 00:55 by CB
18			TPH	EPA 418.1	ppm	Standard	Mar 5, 1997 11:15		Mar 10, 1997 by HL	Mar 10, 1997 17:50 by HL
19 B3C-2(5-6)		170560-011	BTEX	SW-846	ppm	Standard	Mar 5, 1997 14:10		Mar 10, 1997 by CB	Mar 11, 1997 01:12 by CB
20			TPH	EPA 418.1	ppm	Standard	Mar 5, 1997 14:10		Mar 10, 1997 by HL	Mar 10, 1997 17:53 by HL
21 B3C-2(13-14)		170560-012	BTEX	SW-846	ppm	Standard	Mar 5, 1997 14:50		Mar 10, 1997 by CB	Mar 10, 1997 16:00 by CB
22			TPH	EPA 418.1	ppm	Standard	Mar 5, 1997 14:50		Mar 10, 1997 by HL	Mar 10, 1997 17:56 by HL

CERTIFICATE OF ANALYSIS SUMMARY 1-70560

K.E.I. Consultants, Inc.

Project ID: 610057-2-3,3A,3B,3C
 Project Manager: Ann Baker
 Project Location: Sites 3,3A,3B,3C

Project Name: *TNMPL Monument*

Date Received in Lab : Mar 7, 1997 10:10 by CB
 Date Report Faxed: Mar 12, 1997

XENCO contact : Carlos Castro/Edward Yonemoto

Analysis Requested		Lab ID: Field ID: Depth:	170560-001 B3-1 1-2'	170560-002 B3-1 13-14'	170560-003 B3A-1 4-5'	170560-004 B3A-1 6-7'	170560-006 B3A-1 10-11'	170560-007 B3B-1 4-5'	170560-008 B3B-1 13-14'	170560-009 B3C-1 1-2'	170560-010 B3C-1 13-14'
			ppm (mg/L - mg/Kg)								
BTEX by EPA 8020			Date Analyzed - Analytical Results								
Benzene			Mar 10, 1997 < 0.020	Mar 10, 1997 < 0.020	Mar 10, 1997 < 0.020	Mar 11, 1997 < 0.050	Mar 10, 1997 < 0.020	Mar 11, 1997 < 0.020	Mar 11, 1997 < 0.020	Mar 11, 1997 < 0.020	Mar 11, 1997 < 0.020
Toluene			< 0.020	< 0.020	< 0.020	0.135	< 0.020	< 0.020	< 0.020	< 0.020	< 0.020
Ethylbenzene			< 0.020	< 0.020	< 0.020	0.082	< 0.020	< 0.020	< 0.020	< 0.020	< 0.020
m,p-Xylenes			< 0.040	< 0.040	< 0.040	0.387	< 0.040	< 0.040	< 0.040	< 0.040	< 0.040
o-Xylene			< 0.020	< 0.020	< 0.020	0.102	< 0.020	< 0.020	< 0.020	< 0.020	< 0.020
Total BTEX			< 0.120	< 0.120	< 0.120	0.706	< 0.120	< 0.120	< 0.120	< 0.120	< 0.120
			Date Analyzed - Analytical Results								
Total Petroleum Hydrocarbons by EPA 418.1			Mar 10, 1997 48.0	Mar 10, 1997 38.0	Mar 10, 1997 49.5	Mar 10, 1997 2830	Mar 10, 1997 31.5	Mar 10, 1997 37.0	Mar 10, 1997 52.0	Mar 10, 1997 36.0	Mar 10, 1997 56.0
Total Petroleum Hydrocarbons											

This report summary, and the entire report it represents, has been made for the exclusive and confidential use of K.E.I. Consultants, Inc..
 The interpretations and results expressed through this analytical report represent the best judgment of XENCO Laboratories.
 XENCO Laboratories, however, assumes no responsibility and makes no warranty to the end use of the data hereby presented.


 Edward H. Yonemoto, Ph.D.
 QA/QC Manager

CERTIFICATE OF ANALYSIS SUMMARY 1-70560

K.E.I. Consultants, Inc. Project Name: TNMPL Monument Date Received in Lab : Mar 7, 1997 10:10 by CB Date Report Faxed: Mar 12, 1997 XENCO contact : Carlos Castro/Edward Yonemoto		Project ID: 610057-2-3,3A,3B,3C Project Manager: Ann Baker Project Location: Sites 3,3A,3B,3C						
Analysis Requested	Lab ID: Field ID: Depth:	170560-011 B3C-2 5-6'	170560-012 B3C-2 13-14'					
		Date Analyzed - Analytical Results						
BTEX by EPA 8020 Benzene Toluene Ethylbenzene m,p-Xylenes o-Xylene Total BTEX		Mar 11, 1997 < 0.020 < 0.020 < 0.020 < 0.040 < 0.020 < 0.120	Mar 10, 1997 < 0.020 < 0.020 < 0.020 < 0.040 < 0.020 < 0.120					ppm (mg/L - mg/Kg)
Total Petroleum Hydrocarbons by EPA 418.1 Total Petroleum Hydrocarbons		Mar 10, 1997 30.5	Mar 10, 1997 26.5					ppm (mg/L - mg/Kg)

This report summary, and the entire report it represents, has been made for the exclusive and confidential use of K.E.I. Consultants, Inc.. The interpretations and results expressed through this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories, however, assumes no responsibility and makes no warranty to the end use of the data hereby presented.

Edward Yonemoto, Ph.D.
 QA/QC Manager



Certificate Of Quality Control for Batch : 17A25A73

SW- 346 5030/3020 BTX

Date Validated: Mar 11, 1997 10:00

Date Analyzed: Mar 10, 1997 13:07

QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: CB

Matrix: Solid

MATRIX SPIKE / MATRIX SPIKE DUPLICATE AND RECOVERY

Q.C. Sample ID 170565- 002	Parameter	[A]	[B]	[C]	[D]	[E]	[F]	[G]	[H]	[I]	[J]	
		Sample Result ppm	Matrix Spike Result ppm	Matrix Spike Duplicate Result ppm	Matrix Spike Amount ppm	Method Detection Limit ppm	Matrix Limit Relative Difference %	QC	QC	Matrix Spike Recovery Range %	Qualifier	
								Spike Relative Difference %	Matrix Spike Recovery %			M.S.D. Recovery %
Benzene		< 0.020	2.160	2.020	2.000	0.020	6.7	108.0	101.0	65-135		
Toluene		< 0.020	2.060	1.938	2.000	0.020	6.1	103.0	96.9	65-135		
Ethylbenzene		< 0.020	2.180	2.040	2.000	0.020	6.6	109.0	102.0	65-135		
m,p-Xylenes		< 0.040	4.440	4.180	4.000	0.040	6.0	111.0	104.5	65-135		
o-Xylene		< 0.020	2.180	2.040	2.000	0.020	6.6	109.0	102.0	65-135		

Spike Relative Difference [F] = $200 \cdot (B-C)/(B+C)$
Matrix Spike Recovery [G] = $100 \cdot (B-A)/D$
M.S.D. = Matrix Spike Duplicate
M.S.D. Recovery [H] = $100 \cdot (C-A)/D$
N.D. = Below detection limit or not detected
All results are based on MDL and validated for QC purposes

Edward H. Yonemoto, Ph.D.
QA/QC Manager



Certificate Of Quality Control for Batch : 17A25A74

SW- 346 5030/3020 BTEX

Date Validated: Mar 11, 1997 11:00
Date Analyzed: Mar 10, 1997 22:18
QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: CB
Matrix: Solid

MATRIX SPIKE / MATRIX SPIKE DUPLICATE AND RECOVERY

Q.C. Sample ID 170563- 001	Parameter	[A]	[B]	[C]	[D]	[E]	Matrix	[F]	[G]	[H]	[I]	[J]
		Sample Result ppm	Matrix Spike Result ppm	Matrix Spike Duplicate Result ppm	Matrix Spike Amount ppm	Method Detection Limit ppm	Limit Relative Difference %	QC	QC	QC	Matrix Spike Recovery Range %	Qualifier
								Spike Relative Difference %	Matrix Spike Recovery %	M.S.D. Recovery %		
	Benzene	< 0.020	1.762	1.798	2.000	0.020	25.0	2.0	88.1	89.9	65-135	
	Toluene	< 0.020	1.784	1.842	2.000	0.020	25.0	3.2	89.2	92.1	65-135	
	Ethylbenzene	< 0.020	1.856	1.934	2.000	0.020	25.0	4.1	92.8	96.7	65-135	
	m,p-Xylenes	< 0.040	3.740	3.940	4.000	0.040	25.0	5.2	93.5	98.5	65-135	
	o-Xylene	< 0.020	1.808	1.928	2.000	0.020	25.0	6.4	90.4	96.4	65-135	

Spike Relative Difference [F] = $200 \times (B-C)/(B+C)$
Matrix Spike Recovery [G] = $100 \times (B-A)/[D]$
M.S.D. = Matrix Spike Duplicate
M.S.D. Recovery [H] = $100 \times (C-A)/[D]$
N.D. = Below detection limit or not detected
All results are based on MDL and validated for QC purposes

Edward H. Yonemoto, Ph.D.
QA/QC Manager

Certificate Of Quality Control for Batch : 17A25A75

SW- 346 5030/3020 BTEX

Date Validated: Mar 11, 1997 16:30

Date Analyzed: Mar 11, 1997 09:38

QA/QC Manager: Edward H. Yonemoto, Ph.D.

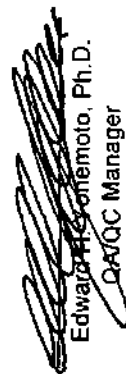
Analyst: CB

Matrix: Solid

MATRIX SPIKE / MATRIX SPIKE DUPLICATE AND RECOVERY

Q.C. Sample ID 170563- 002	Parameter	[A] Sample Result ppm	[B] Matrix Spike Result ppm	[C] Matrix Spike Duplicate Result ppm	[D] Matrix Spike Amount ppm	[E] Method Detection Limit ppm	Matrix Limit Relative Difference %	[F] QC		[G] QC		[H] QC		[I] Matrix Spike Recovery Range %	[J] Qualifier
								Spike Relative Difference %		Matrix Spike Recovery %		M.S.D. Recovery %			
Benzene		< 0.020	1.866	1.784	2.000	0.020	25.0	4.5		93.3		89.2		65-135	
		< 0.020	1.894	1.810	2.000	0.020	25.0	4.0		94.2		90.6		65-135	
Toluene		< 0.020	1.872	1.800	2.000	0.020	25.0	3.9		93.6		90.0		65-135	
		< 0.040	3.840	3.680	4.000	0.040	25.0	4.3		96.0		92.0		65-135	
m,p-Xylenes		< 0.020	1.802	1.812	2.000	0.020	25.0	3.8		94.1		90.6		65-135	
		< 0.020	1.802	1.812	2.000	0.020	25.0	3.8		94.1		90.6		65-135	

Spike Relative Difference [F] = $200 \cdot (B-C)/(B+C)$
Matrix Spike Recovery [G] = $100 \cdot (B-A)/[D]$
M.S.D. = Matrix Spike Duplicate
M.S.D. Recovery [H] = $100 \cdot (C-A)/[D]$
N.D. = Below detection limit or not detected
All results are based on MDL and validated for QC purposes


Edward H. Yonemoto, Ph.D.
QA/QC Manager

EPA 418.1 Total Petroleum Hydrocarbons

Date Validated: Mar 11, 1997 11:00

Analyst: HL

Date Analyzed: Mar 10, 1997 17:29

Matrix: Solid

QA/QC Manager: Edward H. Yonemoto, Ph.D.

MATRIX SPIKE ANALYSIS							
Q.C. Sample ID 170560- 003	[A]	[B]	[C]	[D]	[E]	[F]	[G]
	Sample Result	Matrix Spike Result	Matrix Spike Amount	Method Detection Limit	QC	LIMITS	
					Matrix Spike Recovery	Recovery Range	
Parameter	ppm	ppm	ppm	ppm	%	%	Qualifier
Total Petroleum Hydrocarbons	49.50	211	198	7.50	81.7	65-135	

Matrix Spike Recovery [E] = $100 \times (B-A)/(C)$

N.C. = Not calculated, data below detection limit

N.D. = Below detection limit

All results are based on MDL and validated for QC purposes only


Edward H. Yonemoto, Ph.D.
QA/QC Manager

**Certificate Of Quality Control for Batch : 17A30A82****EPA 418.1 Total Petroleum Hydrocarbons**

Date Validated: Mar 11, 1997 11:00

Analyst: HL

Date Analyzed: Mar 10, 1997 17:34

Matrix: Solid

QA/QC Manager: Edward H. Yonemoto, Ph.D.

MATRIX DUPLICATE ANALYSIS						
Q.C. Sample ID 170560- 004	[A] Sample Result	[B] Duplicate Result	[C] Method Detection Limit	[D] QC Relative Difference %	[E] LIMITS Relative Difference %	[F] Qualifier
	ppm	ppm	ppm			
Parameter						
Total Petroleum Hydrocarbons	2830	3170	75.0	11.3	30.0	

Relative Difference [D] = $200 \times (B-A)/(B+A)$

N.C. = Not calculated, data below detection limit

N.D. = Below detection limit

All results are based on MDL and validated for QC purposes only

Edward H. Yonemoto, Ph.D.
QA/QC Manager



Certificate Of Quality Control for Batch : 17A30A82

EPA 418.1 Total Petroleum Hydrocarbons

Date Validated: Mar 11, 1997 11:00

Analyst: HL

Date Analyzed: Mar 10, 1997 17:11

Matrix: Solid

QA/QC Manager: Edward H. Yonemoto, Ph.D.

Parameter	BLANK SPIKE ANALYSIS						Qualifier
	[A]	[B]	[C]	[D]	[E]	[F]	
	Blank Result	Blank Spike Result	Blank Spike Amount	Method Detection Limit	QC	LIMITS	
	ppm	ppm	ppm	ppm	Blank Spike Recovery %	Recovery Range %	
Total Petroleum Hydrocarbons	< 7.50	186	198	7.50	94.1	65-135	

Blank Spike Recovery [E] = $100 \times (B-A)/(C)$

N.C. = Not calculated, data below detection limit

N.D. = Below detection limit

All results are based on MDL and validated for QC purposes only


Edward H. Yonemoto, Ph.D.
QA/QC Manager

ANALYTICAL REPORT 1-70811

for

K.E.I. Consultants, Inc.

Project Manager: Ann Baker

Project Name: TNMPL

Project Id: 610057-2-3A

April 10, 1997



HOUSTON - DALLAS - SAN ANTONIO

KEI CONSULTANTS

APR 2 1997

11381 Meadowglen Lane Suite L * Houston, Texas 77082-2647
Phone (281) 589-0692 Fax (281) 589-0695



11381 Meadowglen Suite L
Houston, Texas 77082-2647
(281) 589-0692 Fax: (281) 589-0695
Houston · Dallas · San Antonio

April 10, 1997

Project Manager: Ann Baker
K.E.I. Consultants, Inc.
5309 Wurzbach Rd. Suite 100
San Antonio, TX 78238

Reference: **XENCO Report No.: 1-70811**
Project Name: TNMPL
Project ID: 610057-2-3A
Project Address: Site 3A

Dear Ann Baker:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with XENCO Chain of Custody Number 1-70811. All results being reported to you apply only to the samples analyzed, properly identified with a Laboratory ID number. This letter documents the official transmission of the contents of the report and validates the information contained within.

All the results for the quality control samples passed thorough examination. Also, all parameters for data reduction and validation checked satisfactorily. In view of this, we are able to release the analytical data for this report within acceptance criteria for accuracy, precision, and completeness.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 3 years in our archives and after that time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in COC No. 1-70811 will be filed for 60 days, and after that time they will be properly disposed of without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

XENCO Laboratories is accredited by the American Association for Laboratory Accreditation (A2LA) for technical competence in the field of Environmental Testing (Certificate No. 0343-01). In accordance with A2LA's guidelines, XENCO operates a Quality System that meets ISO/IEC Guide 25 requirements and is strictly implemented and enforced through our standard QA/QC procedures.

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

Sincerely,


Eddie Yohemoto, Ph.D.
QA/QC Manager

Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.
Certified in California, Oklahoma, Kansas, Arkansas, and approved by numerous other States and Agencies.
A Small Business and Minority Status Company that delivers SERVICE and QUALITY!

[illegible]



ANALYTICAL CHAIN OF CUSTODY REPORT CHRONOLOGY OF SAMPLES

K.E.I. Consultants, Inc.

Project ID: 610057-2-3A
Project Manager: Ann Baker
Project Location: Site 3A

XENCO COC#: 1-70811

Date Received in Lab: Apr 8, 1997 12:00 by CMC

XENCO contact : Carlos Castro/Edward Yonemoto

Date and Time									
Field ID	Lab. ID	Method Name	Method ID	Units	Turn Around	Sample Collected	Addition Requested	Extraction	Analysis
1 3AT-1@3' Soil	170811-001	BTEX	SW-846	ppm	Standard	Apr 2, 1997 10:16		Apr 8, 1997 by HL	Apr 8, 1997 15:28 by HL
2		TPH	EPA 418.1	ppm	Standard	Apr 2, 1997 10:16		Apr 9, 1997 by OL	Apr 9, 1997 15:06 by OL
3 3AT-1@13' Soil	170811-002	BTEX	SW-846	ppm	Standard	Apr 2, 1997 10:38		Apr 8, 1997 by HL	Apr 8, 1997 16:19 by HL
4		TPH	EPA 418.1	ppm	Standard	Apr 2, 1997 10:38		Apr 9, 1997 by OL	Apr 9, 1997 15:09 by OL

**CERTIFICATE OF ANALYSIS SUMMARY 1-70811****K.E.I. Consultants, Inc.****Project Name: TNMPL****Project ID: 610057-2-3A****Project Manager: Ann Baker****Project Location: Site 3A****Date Received in Lab: Apr 8, 1997 12:00 by CMC****Date Report Faxed: Apr 10, 1997****XENCO contact: Carlos Castro/Edward Yonemoto**

Analysis Requested	Lab ID:	170811-001	170811-002				
	Field ID:	3AT-1@3'	3AT-1@13'				
	Depth:	3'	13'				
BTEX Analyzed by EPA 8020	Date Analyzed - Analytical Results ppm (mg/L - mg/Kg)						
	Apr 8, 1997	Apr 8, 1997					
Benzene	< 0.020	< 0.020					
Toluene	< 0.020	< 0.020					
Ethylbenzene	< 0.020	< 0.020					
m,p-Xylenes	< 0.040	< 0.040					
o-Xylene	< 0.020	< 0.020					
Total BTEX	< 0.120	< 0.120					
TPH Analyzed by EPA 418.1	Date Analyzed - Analytical Results ppm (mg/L - mg/Kg)						
	Apr 9, 1997	Apr 9, 1997					
Total Petroleum Hydrocarbons	< 10.0	< 10.0					

This report summary, and the entire report it represents, has been made for the exclusive and confidential use of K.E.I. Consultants, Inc..

The interpretations and results expressed through this analytical report represent the best judgment of XENCO Laboratories. Xenco Laboratories, however, assumes no responsibility and makes no warranty to the end use of the data hereby presented.


Edward Yonemoto, Ph.D.
QA/QC Manager

SW- 846 5030/8020 BTEX

Date Validated: Apr 9, 1997 09:00

Analyst: HL

Date Analyzed: Apr 8, 1997 15:10

Matrix: Solid

QA/QC Manager: Edward H. Yonemoto, Ph.D.

BLANK SPIKE ANALYSIS							
Parameter	[A]	[B]	[C]	[D]	[E]	[F]	[G] Qualifier
	Blank Result	Blank Spike Result	Blank Spike Amount	Method Detection Limit	QC	LIMITS	
	ppm	ppm	ppm	ppm	Blank Spike Recovery %	Recovery Range %	
Benzene	< 0.0010	0.1050	0.1000	0.0010	105.0	65-135	
Toluene	< 0.0010	0.1080	0.1000	0.0010	108.0	65-135	
Ethylbenzene	< 0.0010	0.1090	0.1000	0.0010	109.0	65-135	
m,p-Xylenes	< 0.0020	0.2220	0.2000	0.0020	111.0	65-135	
o-Xylene	< 0.0010	0.1080	0.1000	0.0010	108.0	65-135	

 Blank Spike Recovery [E] = $100 \times (B-A)/(C)$

N.C. = Not calculated, data below detection limit

N.D. = Below detection limit

All results are based on MDL and validated for QC purposes only


 Edward H. Yonemoto, Ph.D.
 QA/QC Manager



Certificate Of Quality Control for Batch : 17A25B11

SW- 346 5030/3020 BTX

Date Validated: Apr 9, 1997 09:00

Date Analyzed: Apr 8, 1997 15:45

QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: HL

Matrix: Solid

MATRIX SPIKE / MATRIX SPIKE DUPLICATE AND RECOVERY

Q.C. Sample ID 170311- 001	Parameter	[A]	[B]	[C]	[D]	[E]	Matrix Limit	[F]	[G]	[H]	[I]	[J]
		Sample Result	Matrix Spike Result	Matrix Spike Duplicate Result	Matrix Spike Amount	Method Detection Limit	Relative Difference	QC	QC	QC	Matrix Spike Recovery Range	Qualifier
		ppm	ppm	ppm	ppm	ppm	%	%	Matrix Spike Recovery %	M.S.D. Recovery %	%	
Benzene		< 0.020	2.100	2.140	2.000	0.020	25.0	1.9	105.0	107.0	65-135	
Toluene		< 0.020	2.120	2.100	2.000	0.020	25.0	0.9	106.0	105.0	65-135	
Ethylbenzene		< 0.020	2.100	2.140	2.000	0.020	25.0	1.9	105.0	107.0	65-135	
m,p-Xylenes		< 0.040	4.300	4.360	4.000	0.040	25.0	1.4	107.5	109.0	65-135	
o-Xylene		< 0.020	2.100	2.140	2.000	0.020	25.0	1.9	105.0	107.0	65-135	

Spike Relative Difference [F] = $200 \cdot (B-C)/(B+C)$

Matrix Spike Recovery [G] = $100 \cdot (B-A)/[D]$

M.S.D. = Matrix Spike Duplicate

M.S.D. Recovery [H] = $100 \cdot (C-A)/[D]$

N.D. = Below detection limit or not detected

All results are based on MDL and validated for QC purposes

Edward H. Yonemoto, Ph.D.
QA/QC Manager

EPA 418.1 Total Petroleum Hydrocarbons

Date Validated: Apr 9, 1997 17:00

Analyst: OL

Date Analyzed: Apr 9, 1997 14:45

Matrix: Solid

QA/QC Manager: Edward H. Yonemoto, Ph.D.

BLANK SPIKE ANALYSIS

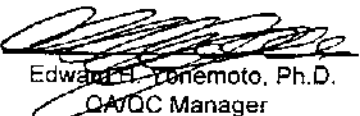
Parameter	[A]	[B]	[C]	[D]	[E]	[F]	[G] Qualifier
	Blank Result	Blank Spike Result	Blank Spike Amount	Method Detection Limit	QC	LIMITS	
	ppm	ppm	ppm	ppm	Blank Spike Recovery %	Recovery Range %	
Total Petroleum Hydrocarbons	< 7.50	177	198	7.50	89.6	65-135	

Blank Spike Recovery [E] = $100 \times (B-A)/(C)$

N.C. = Not calculated, data below detection limit

N.D. = Below detection limit

All results are based on MDL and validated for QC purposes only


Edward H. Yonemoto, Ph.D.
QA/QC Manager



Certificate Of Quality Control for Batch : 17A30B30

EPA 418.1 Total Petroleum Hydrocarbons

Date Validated: Apr 9, 1997 17:00
Date Analyzed: Apr 9, 1997 14:48
QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: OL
Matrix: Solid

MATRIX SPIKE / MATRIX SPIKE DUPLICATE AND RECOVERY												
Q.C. Sample ID 170812- 006	Parameter	[A]	[B]	[C]	[D]	[E]	Matrix	[F]	[G]	[H]	[I]	[J]
		Sample Result ppm	Matrix Spike Result ppm	Matrix Spike Duplicate Result ppm	Matrix Spike Amount ppm	Method Detection Limit ppm	Limit Relative Difference %	QC	QC	QC	Matrix Spike	Qualifier
								Spike Relative Difference %	Matrix Spike Recovery %	M.S.D. Recovery %	Recovery Range %	
Total Petroleum Hydrocarbons		< 7.50	153	160	198	7.50	30.0	4.5	77.4	81.0	65-135	

Spike Relative Difference [F] = $200 \cdot (B-C)/(B+C)$
Matrix Spike Recovery [G] = $100 \cdot (B-A)/[D]$
M.S.D. = Matrix Spike Duplicate
M.S.D. Recovery [H] = $100 \cdot (C-A)/[D]$
N.D. = Below detection limit or not detected
All results are based on MDL and validated for QC purposes

Edward H. Yonemoto, Ph.D.
QA/QC Manager