

CLOSURE REPORT



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

October 19, 1998

CERTIFIED MAIL
RETURN RECEIPT NO: Z-274-520-573

Mr. Tony Savoie
Texas-New Mexico Pipe Line Company
P.O. Box 1030
Jal, New Mexico 88252

**RE: SPILL REMEDIATION AND INVESTIGATION
MONUMENT SITE #13**

Dear Mr. Savoie:

The New Mexico Oil Conservation Division (OCD) has reviewed Texas-New Mexico Pipe Line Company's (TNMPLC) July 24, 1998 "CLOSURE REPORT, MONUMENT SITE NO. 13, SECTION 5, TOWNSHIP 20 SOUTH, RANGE 37 EAST, LEA COUNTY, NEW MEXICO, JOB NO. 610057-2-13" which was submitted on behalf of TNMPLC by their consultant KEI. This document contains the results of the remediation and investigation of a spill of crude oil from a TNMPLC pipeline and requests closure of the remedial actions.

The above referenced closure request is approved.

Please be advised that OCD approval does not relieve TNMPLC of liability if remaining contaminants pose a future threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve TNMPLC of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions, please contact me at (505) 827-7154.

Sincerely,

William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Supervisor
Theresa Nix, KEI



5309 Wurzbach, Suite 100
San Antonio, Texas 78238
(210) 680-3767
(210) 680-3763 FAX

July 24, 1998

Mr. Tony Savoie
TEXAS - NEW MEXICO PIPE LINE COMPANY
P.O. Box 1030
Jal, New Mexico 88252

RECEIVED

JUL 27 1998

Environmental Bureau
Oil Conservation Division

Re: Closure Report
Monument Site No. 13
Section 5, Township 20 South, Range 37 East
Lea County, New Mexico
Job No. 610057-2-13

Dear Mr. Savoie:

Transmitted with this letter is the final copy of the Closure Report for Monument Site No. 13 located in Lea County, New Mexico. One copy has been forwarded to OCD Hobbs and one to OCD Sante Fe.

Please contact me at (210) 680-3767 if you have any questions or comments.

Respectfully,

for
Theresa Nix
Project Manager

Enclosure

cc: Marc Oler; TTTI
Wayne Price, OCD Hobbs
William Olson, OCD Sante Fe ✓



RECEIVED

JUL 27 1998

Environmental Bureau
Oil Conservation Division

CLOSURE REPORT

**TEXAS - NEW MEXICO PIPE LINE COMPANY
MONUMENT SITE 13
LEA COUNTY, NEW MEXICO**



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(210) 680-3767
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CLOSURE REPORT

**TEXAS - NEW MEXICO PIPE LINE COMPANY
MONUMENT SITE 13
LEA COUNTY, NEW MEXICO**

PREPARED FOR:

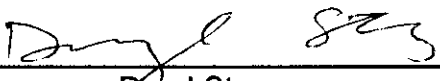
TEXAS - NEW MEXICO PIPE LINE COMPANY

P. O. Box 1030
Jal, New Mexico 88252

Mr. Tony Savoie

PREPARED BY:

KEI



Daryl Stacey
Project Manager

Theresa Nix
Project Manager

Pat Bullinger, P.E.

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CHAIN-OF-CUSTODY DOCUMENTATION

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PURPOSE AND SCOPE

The objective of the site activities was to obtain closure based on New Mexico Oil Conservation Division (OCD) regulations. The following activities were performed to achieve this objective:

- determination of closure standards
- removal of impacted soil
- characterization of removed impacted soil
- confirmation sampling in the excavated area
- transportation and off-site landfarming of impacted soil
- backfilling with clean soil in the excavated area

PREVIOUS INVESTIGATION

The Texas - New Mexico Pipe Line Company (TNMPL) alleged release site 13 is located in Section 5, Township 20 South, Range 37 East as shown on FIG. 1. A subsurface investigation was conducted at the site in general accordance with the work plan submitted with the Phase I - Preliminary Site Characterization Report dated February 28, 1997. The results of this investigation are summarized in the Comprehensive Assessment Report dated August 20, 1997. The following activities were performed as part of the subsurface investigation:

- sensitive receptor survey, migration pathway analysis, and registered water well search
- installation of 5 soil borings on March 7, 1997
- collection of soil samples from native soils during soil boring installation on March 7, 1997
- conversion of 3 soil borings into monitoring wells and collection of additional soil samples at lower depths on March 24 and 25, 1997
- collection of ground water samples from the monitoring wells for laboratory analyses on May 2, 1997

Soil samples collected during the advancement of soil borings B13-1 through B13-5 were submitted for determination of benzene, toluene, ethylbenzene, and xylene (BTEX) and total petroleum hydrocarbons (TPH) concentrations. Soil samples obtained from borings B13-1 through B13-5 indicated BTEX concentrations below method detection limits (ND). Laboratory results from the soil samples are summarized in TABLE I. Soil laboratory reports and chain-of-custody documentation are presented as APPENDIX A.

Ground water monitoring and sampling events were conducted at the site during the second, third, and fourth quarters of 1997. Ground water samples were submitted for determination of BTEX, polynuclear aromatic hydrocarbons (PAH), metals, total dissolved solids (TDS) and cations/anions. Analytical results for water samples did not indicate hydrocarbon impact. During the fourth quarter event conducted on November 1, 1997, the depth to ground water ranged from 31.38 to 32.02 feet below ground surface. The calculated gradient was approximately 0.003 ft/ft towards the southwest. Ground water

contours are presented on FIG. 2. Ground water results are summarized in TABLES II through IV. Ground water analytical reports and chain-of-custody documentation are presented in APPENDIX B. Location of borings and monitoring wells are shown on FIG. 2.

CLOSURE ACTIVITIES

CLOSURE STANDARDS

The New Mexico OCD Guidelines for Remediation of Leaks, Spills, and Releases contains the standard criteria for remediation activities. A ranking analysis for the site was performed to determine appropriate soil remediation levels. The ranking analysis is as follows:

Depth to Ground Water	Less Than 50 Feet	20 Points
	Greater Than 1000 Feet to Water Source	
Well Head Protection	Greater Than 200 Feet to Private Water Source	20 Points
Surface Water Body	Greater Than 1000 Feet	0 Points
Total Ranking Score		40 Points

Based on the total ranking score, the closure objectives for this site for concentrations of benzene, BTEX, and TPH are summarized below.

CONSTITUENT	CLOSURE CONCENTRATIONS (mg/kg)
BENZENE	10
BTEX	50
TPH	100 + Background Concentration

EXCAVATION, TREATMENT, AND BACKFILL

An estimated 6,198 cubic yards of impacted soil were removed from Site 13 and transported to an off-site landfarm in December 1997. TNMPL characterized the excavated soil by collecting 1 composite soil sample from the stockpile on December 5, 1997. The sample was submitted for determination of TPH concentration. Laboratory results indicated a TPH concentration of 1,149 mg/kg.

Composite soil samples were collected by Allstate Services Environmental of Midland, Texas on December 12, 1997, from the excavation bottom and sidewall and submitted for determination of BTEX and TPH concentrations. Laboratory results of the composite soil samples indicated the following:

SAMPLE LOCATION	TPH (mg/kg)	BENZENE (mg/kg)	BTEX (mg/kg)
Final Soil Sidewall (mg/kg)	ND	ND	0.744
Soil Bottom (mg/kg)	ND	ND	0.134

Soil laboratory results are summarized in Table I and confirmation soil results are graphically presented on FIG. 3. Soil analytical reports and chain-of-custody documentation are presented in APPENDIX A.

A sample of groundwater, which had seeped into the excavation, was collected by Allstate Services Environmental on December 12, 1997, and submitted for determination of BTEX concentration. The ground water results are presented on Table II. The BTEX concentration was below New Mexico Environmental Department (NMED) Drinking Water Standards. The NMED Drinking Water Standards for BTEX are as follows:

CONSTITUENT	DRINKING WATER STANDARD (mg/l)
BENZENE	0.01
TOLUENE	0.75
ETHYLBENZENE	0.75
XYLENES	0.62

Authorization to transport and landfarm the impacted soils was obtained from OCD. The impacted soils were transported to C&C Landfarm Incorporated located approximately 2 miles south of Monument, New Mexico. Disposal documentation is presented in APPENDIX C.

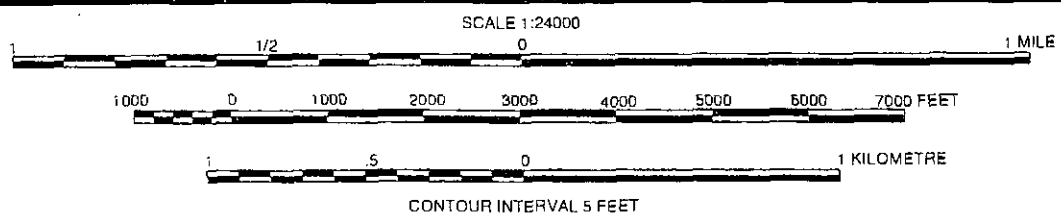
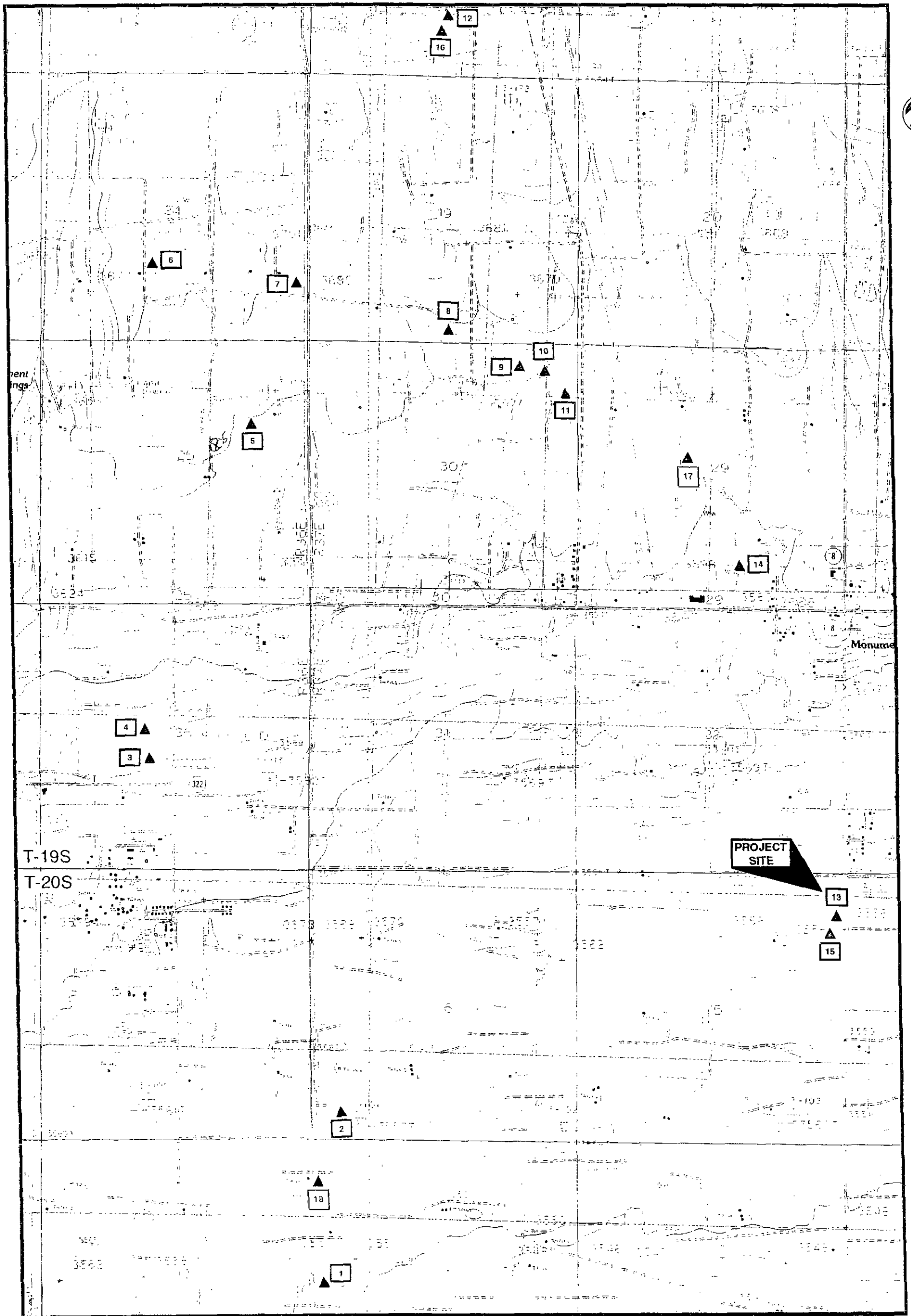
Approximately 4,998 cubic yards of clean fill material was purchased from Mr. Cooper and placed in the excavation. The remaining non-impacted stockpiled soils from the excavation activities were used to complete the backfilling operations.

CLOSURE SUMMARY

The following can be summarized from field and laboratory data:

- Approximately 6,200 cubic yards of impacted soil was excavated, stockpiled, and landfarmed off-site.
- Confirmation soil samples at the site indicated TPH, benzene, and BTEX concentrations below closure standards.
- Groundwater samples obtained through 3 quarters of monitoring at the site indicated no hydrocarbon impact. BTEX concentrations from these samples and a water sample taken from the bottom of the excavation were below NMED Drinking Water Standards.

From the details presented above, we request the site be closed under New Mexico Oil Conservation Division (OCD) regulations.



SITE LOCATION MAP

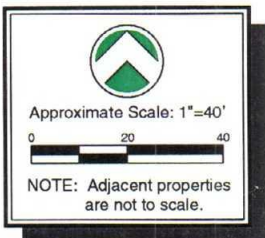
TEXAS - NEW MEXICO PIPE LINE CO.

MONUMENT SITE NO. 13

LEA COUNTY, NEW MEXICO

610057

FIG 1



CLOSURE LEVEL

TPH = 100

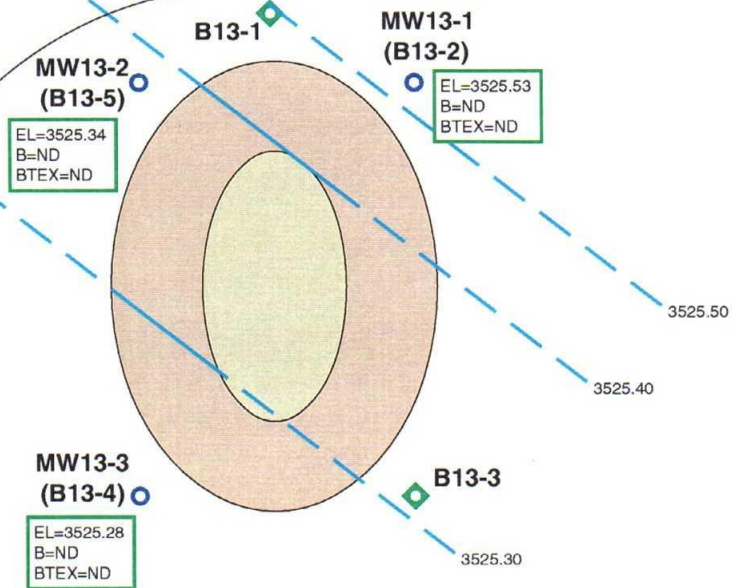
SOIL RESULTS

	Sidewall	Bottom	Stockpile
TPH =	ND	ND	1149

LEGEND

- Location of Soil Boring advanced by KEI on March 7, 1997.
- Location of Monitoring Well installed by KEI on March 25, 1997.
- Excavation
- Stockpile
- EL= Ground water elevation (feet) calculated using measurements obtained on November 1, 1997.
- B= Benzene Concentration (mg/l)
- BTEX= Total Benzene, Toluene, Ethylbenzene, and Xylenes Concentration (mg/l)
- TPH= Total Petroleum Hydrocarbon Concentration (mg/kg)
- ND= Not Detected

DIRT ROAD



NOTE:

- Ground water samples were collected on November 1, 1997.
- Soil samples were collected on December 12, 1997.

HWY. 8

04/14/98 RW (TPH-4087)

kei

GROUND WATER CONTOURS / CONCENTRATION MAP - NOVEMBER 1997

TEXAS - NEW MEXICO PIPE LINE CO.

MONUMENT SITE NO. 13

LEA COUNTY, NEW MEXICO

610057

FIG 2

GENERAL NOTES

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

Method detection/reporting limits:

Soil:	BTEX	-	0.001 to 0.100 mg/kg
	TPH	-	10 mg/kg
Water:	BTEX	-	0.001 to 0.006 mg/l
	TPH	-	1 mg/l
	Metals	-	0.0010 to 0.25 mg/l
	PAH	-	0.002 mg/l

Laboratory test methods:

BTEX	-	EPA Method SW846-8020, 5030
TPH	-	EPA Method 418.1
Metals	-	EPA Method 6010
PAH	-	EPA Method 8100
Bicarbonate	-	SM4500CO2D
Carbonate	-	SM4500CO2D
TDS	-	EPA Method 160.1
Anions	-	EPA Method 300.0
TIC	-	Modified Method 415.1

TABLE I

SUMMARY OF SOIL RESULTS - BTEX AND TPH
TEXAS - NEW MEXICO PIPE LINE COMPANY
MONUMENT SITE NO. 13
LEA COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DATE	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL-BENZENE (mg/kg)	XYLENES (mg/kg)	BTEX (mg/kg)	TPH (mg/kg)
Boring Installation							
B13-1 at 1-2 feet	03/07/97	ND	ND	ND	ND	ND	2,340
B13-1 at 15-16 feet	03/07/97	ND	ND	ND	ND	ND	ND
B13-2 at 1-2 feet	03/07/97	ND	ND	ND	ND	ND	ND
B13-2 at 9-10 feet	03/07/97	ND	ND	ND	ND	ND	ND
B13-2 at 32-33 feet	03/24/97	ND	ND	ND	ND	ND	33.5
B13-3 at 1-2 feet	03/07/97	ND	ND	ND	ND	ND	ND
B13-3 at 14-16 feet	03/07/97	ND	ND	ND	ND	ND	ND
B13-3 at 32-33 feet	03/25/97	ND	ND	ND	ND	ND	19.0
B13-4 at 1-2 feet	03/07/97	ND	ND	ND	ND	ND	ND
B13-4 at 11-12 feet	03/07/97	ND	ND	ND	ND	ND	ND
B13-4 at 31-32 feet	03/24/97	ND	ND	ND	ND	ND	109
B13-5 at 1-2 feet	03/07/97	ND	ND	ND	ND	ND	ND
B13-5 at 12-13 feet	03/07/97	ND	ND	ND	ND	ND	ND
B13-5 at 32-33 feet	03/25/97	ND	ND	ND	ND	ND	1,370
Soil Characterization Sampling							
Stockpile	12/05/97	---	---	---	---	---	1,149
Confirmation Sampling							
Final Soil Sidewall	12/12/97	ND	0.169	0.116	0.459	0.744	ND
Soil Bottom	12/12/97	ND	ND	ND	0.134	0.134	ND

TABLE II

SUMMARY OF GROUND WATER RESULTS - BTEX
TEXAS - NEW MEXICO PIPE LINE COMPANY
MONUMENT SITE NO. 13
LEA COUNTY, NEW MEXICO

GROUND								
MONITORING WELL NO.	DATE SAMPLED	DEPTH TO WATER (feet)	WATER ELEVATION (feet)	BENZENE (mg/l)	TOLUENE (mg/l)	ETHYL- BENZENE (mg/l)	XYLENES (mg/l)	BTEX (mg/l)
MW13-1	04/30/98	30.60	3526.31	---	---	---	---	---
MW13-1	05/02/97	---	---	ND	ND	ND	ND	ND
MW13-1	08/15/97	---	---	ND	ND	ND	ND	ND
MW13-1	11/01/97	---	---	ND	ND	ND	ND	ND
MW13-2	04/30/98	31.04	3526.04	---	---	---	---	---
MW13-2	05/02/97	---	---	ND	ND	ND	ND	ND
MW13-2	08/15/97	---	---	ND	ND	ND	ND	ND
MW13-2	11/01/97	---	---	ND	ND	ND	ND	ND
MW13-3	04/30/98	31.46	3525.84	---	---	---	---	---
MW13-3	05/02/97	---	---	ND	ND	ND	ND	ND
MW13-3	08/15/97	---	---	ND	ND	ND	ND	ND
MW13-3	11/01/97	---	---	ND	ND	ND	ND	ND
Excavation Bottom	12/12/97	---	---	ND	ND	ND	0.006	0.006

TABLE III

**SUMMARY OF GROUND WATER RESULTS - METALS
TEXAS - NEW MEXICO PIPE LINE COMPANY
MONUMENT SITE NO. 13
LEA COUNTY, NEW MEXICO**

SAMPLE LOCATION	MW13-1	MW13-2	MW13-3
METALS CONSTITUENT	CONCENTRATION (mg/l)		
Aluminum	29.0	12.3	76.9
Barium	0.85	0.22	1.94
Calcium	447	372	1,120
Chromium	ND	ND	0.06
Iron	18.7	7.67	43.6
Magnesium	56.3	53.3	75.6
Manganese	0.60	0.54	1.39
Potassium	10.4	7.65	15.5
Sodium	142	139	122
Tin	7.50	2.89	17.8
Vanadium	0.12	ND	0.25
Boron	0.28	0.26	0.26
Silicon	19.3	26.3	15.4
Strontium	2.24	2.28	2.88

NOTES:

1. Ground water samples were collected on 05/02/97.
2. Metals constituents not listed above were below laboratory detection/reporting limits.

TABLE IV

**SUMMARY OF GROUND WATER RESULTS - MISCELLANEOUS
TEXAS - NEW MEXICO PIPE LINE COMPANY
MONUMENT SITE NO. 13
LEA COUNTY, NEW MEXICO**

MONITORING WELL NO.	BICARBONATE (mg/l)	CARBONATE (mg/l)	TDS (mg/l)	SULFATE (mg/l)	CHLORIDE (mg/l)	TIC (mg/l)
MW13-1	358	1.8	1,080	125	264	80.0
MW13-2	360	3.7	1,100	127	281	56.6
MW13-3	325	2.9	1,180	145	305	73.3

NOTE:

1. Ground water samples were collected on 05/02/97.

CERTIFICATE OF ANALYSIS SUMMARY 1-70587

K.E.I. Consultants, Inc.

Project ID: 610057-02-13
Project Manager: Ann Baker
Project Location: Site 13

Project Name: *TNMPL Monument*

Date Received in Lab : Mar 11, 1997 10:30 by RT
Date Report Faxed: Mar 14, 1997

XENCO contact : Carlos Castro/Edward Yonemoto

Analysis Requested	Lab ID:	170587-001	170587-002	170587-003	170587-004	170587-005	170587-006	170587-007	170587-008	170587-009
	Field ID:	B13-1	B13-1	B13-2	B13-2	B13-3	B13-3	B13-4	B13-4	B13-5
	Depth:	1-2'	15-16'	1-2'	9-10'	1-2'	14-16'	1-2'	11-12'	1-2'
BTEX by EPA 8020										
		Mar 11, 1997	Mar 12, 1997	Mar 12, 1997	Mar 12, 1997	Mar 12, 1997	Mar 13, 1997	Mar 12, 1997	Mar 12, 1997	Mar 12, 1997
Benzene		< 0.050	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Toluene		< 0.050	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Ethylbenzene		< 0.050	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
m,p-Xylenes		< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100
o-Xylene		< 0.050	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Total BTEX		< 0.300	< 0.300	< 0.300	< 0.300	< 0.300	< 0.300	< 0.300	< 0.300	< 0.300
Total Petroleum Hydrocarbons by EPA 418.1										
		Mar 13, 1997	Mar 13, 1997	Mar 13, 1997	Mar 13, 1997	Mar 13, 1997	Mar 13, 1997	Mar 13, 1997	Mar 13, 1997	Mar 13, 1997
Total Petroleum Hydrocarbons	2340	< 10.0	< 10.0	< 10.0	< 10.0	< 10.0	< 10.0	< 10.0	< 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

Project ID: 610057-02-13
 Project Manager: Ann Baker
 Project Location: Site 13

K.E.I. Consultants, Inc.

Project Name: TNMPL Monument

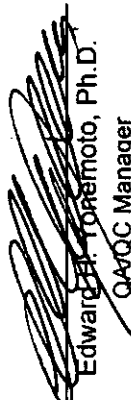
Date Received in Lab : Mar 11, 1997 10:30 by RT

Date Report Faxed: Mar 14, 1997

XENCO contact : Carlos Castro/Edward Yonemoto

Analysis Requested	Lab ID: Field ID: Depth:	Date Analyzed - Analytical Results					ppm (mg/L - mg/Kg)
		170587-010	B13-5	12-13'			
BTEX by EPA 8020		Mar 12, 1997					
Benzene		< 0.050					
Toluene		< 0.050					
Ethylbenzene		< 0.050					
m,p-Xylenes		< 0.100					
o-Xylene		< 0.050					
Total BTEX		< 0.300					
Total Petroleum Hydrocarbons by EPA 418.1		Mar 13, 1997					
Total Petroleum Hydrocarbons		< 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 J. Yonemoto, Ph.D.
 QA/QC Manager



Certificate Of Quality Control for Batch : 17A29A78

SW- 846 5030/8020 BTEX

Date Validated: Mar 13, 1997 14:45

Analyst: IF

Date Analyzed: Mar 11, 1997 13:51

Matrix: Solid

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

BLANK SPIKE ANALYSIS							
Parameter	[A]	[B]	[C]	[D]	[E]	[F]	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	0.0857	0.1000	0.0010	85.7	65-135	
Toluene	< 0.0010	0.0922	0.1000	0.0010	92.2	65-135	
Ethylbenzene	< 0.0010	0.0857	0.1000	0.0010	85.7	65-135	
m,p-Xylenes	< 0.0020	0.1840	0.2000	0.0020	92.0	65-135	
o-Xylene	< 0.0010	0.0917	0.1000	0.0010	91.7	65-135	

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

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 : 17A29A78

SW- 846 5030/8020 BTEX

Date Validated: Mar 13, 1997 14:45
Date Analyzed: Mar 11, 1997 20:30
QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: IF
Matrix: Solid

MATRIX SPIKE / MATRIX SPIKE DUPLICATE AND RECOVERY

Q.C. Sample ID 170585- 002	[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]	[G]	[H]	[I]	[J] Qualifier
							Spike Relative Difference %	Matrix Spike Recovery %	QC	Matrix Spike Recovery Range %	
Parameter											
Benzene	< 0.050	1.380	1.430	2.000	0.050	25.0	3.6	69.0	71.5	65-135	
Toluene	< 0.050	1.925	1.805	2.000	0.050	25.0	6.4	96.3	90.3	65-135	
Ethylbenzene	< 0.050	1.610	1.605	2.000	0.050	25.0	0.3	80.5	80.3	65-135	
m,p-Xylenes	< 0.100	3.705	3.580	4.000	0.100	25.0	3.4	92.6	89.5	65-135	
o-Xylene	< 0.050	1.885	1.870	2.000	0.050	25.0	0.8	94.3	93.5	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 : 17A29A79

SW- 846 5030/8020 BTX

Date Validated: Mar 13, 1997 15:30

Date Analyzed: Mar 12, 1997 14:36

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

Analyst: IF

Matrix: Solid

MATRIX SPIKE / MATRIX SPIKE DUPLICATE AND RECOVERY

Q.C. Sample ID 170587- 002		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			< 0.050	2.025	1.895	2.000	0.050	25.0	6.6	101.3	94.8	65-135	
Toluene			< 0.050	2.180	2.110	2.000	0.050	25.0	3.3	109.0	105.5	65-135	
Ethylbenzene			< 0.050	1.925	1.880	2.000	0.050	25.0	2.4	96.3	94.0	65-135	
m,p-Xylenes			< 0.100	4.330	4.210	4.000	0.100	25.0	2.8	108.3	105.3	65-135	
o-Xylene			< 0.050	2.130	2.085	2.000	0.050	25.0	2.1	106.5	104.3	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

SW- 846 5030/8020 BTEX

Date Validated: Mar 13, 1997 15:30

Analyst: IF

Date Analyzed: Mar 12, 1997 09:55

Matrix: Solid

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

BLANK SPIKE ANALYSIS

Parameter	[A] Blank Result ppm	[B] Blank Spike Result ppm	[C] Blank Spike Amount ppm	[D] Method Detection Limit ppm	[E]	[F]	[G] Qualifier
					QC	LIMITS	
					Blank Spike Recovery %	Recovery Range %	
Benzene	< 0.0010	0.0808	0.1000	0.0010	80.8	65-135	
Toluene	< 0.0010	0.0866	0.1000	0.0010	86.6	65-135	
Ethylbenzene	< 0.0010	0.0806	0.1000	0.0010	80.6	65-135	
m,p-Xylenes	< 0.0020	0.1730	0.2000	0.0020	86.5	65-135	
o-Xylene	< 0.0010	0.0886	0.1000	0.0010	88.6	65-135	

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

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 : 17A29A80

SW- 846 5030/8020 BTEx

Date Validated: Mar 13, 1997 16:25

Date Analyzed: Mar 13, 1997 10:27

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

Analyst: IF

Matrix: Solid

BLANK SPIKE / BLANK SPIKE DUPLICATE AND RECOVERY

Parameter	[A]	[B]	[C]	[D]	[E]	Blank Limit	[F]	[G]	[H]	[I]	[J]
	Blank Result ppm	Blank Spike Result ppm	Blank Spike Duplicate Result ppm	Blank Spike Amount ppm	Method Detection Limit ppm	Relative Difference	QC	QC	QC	Blank Spike Recovery Range %	Qualifier
							Spike Relative Difference %	Blank Spike Recovery %	B.S.D. Recovery %		
Benzene	< 0.0010	0.1000	0.0966	0.1000	0.0010	25.0	3.5	100.0	96.6	65-135	
Toluene	< 0.0010	0.1110	0.1020	0.1000	0.0010	25.0	8.5	111.0	102.0	65-135	
Ethylbenzene	< 0.0010	0.1070	0.1040	0.1000	0.0010	25.0	2.8	107.0	104.0	65-135	
m,p-Xylenes	< 0.0020	0.2110	0.2030	0.2000	0.0020	25.0	3.9	105.5	101.5	65-135	
o-Xylene	< 0.0010	0.1110	0.0999	0.1000	0.0010	25.0	10.5	111.0	99.9	65-135	

Spike Relative Difference [F] = $200 \cdot (B-C)/(B+C)$
Blank Spike Recovery [G] = $100 \cdot (B-A)/[D]$
B.S.D. = Blank Spike Duplicate
B.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 14, 1997 10:15

Analyst: CG

Date Analyzed: Mar 13, 1997 17:26

Matrix: Solid

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

MATRIX DUPLICATE ANALYSIS						
Q.C. Sample ID 170583- 001	[A] Sample Result	[B] Duplicate Result	[C] Method Detection Limit	[D]	[E]	[F] Qualifier
				QC	LIMITS	
Parameter				Relative Difference	Relative Difference	
	ppm	ppm	ppm	%	%	
Total Petroleum Hydrocarbons	< 7.50	< 7.50	7.50	N.C	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

EPA 418.1 Total Petroleum Hydrocarbons

Date Validated: Mar 14, 1997 10:15

Analyst: CG

Date Analyzed: Mar 13, 1997 17:28

Matrix: Solid

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

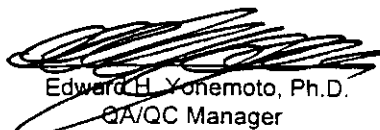
BLANK SPIKE ANALYSIS							
Parameter	[A]	[B]	[C]	[D]	[E]	[F]	[G]
	Blank Result	Blank Spike Result	Blank Spike Amount	Method Detection Limit	QC	LIMITS	Qualifier
	ppm	ppm	ppm	ppm	Blank Spike Recovery %	Recovery Range %	
Total Petroleum Hydrocarbons	< 7.50	201	202	7.50	99.5	65-135	

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

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

EPA 418.1 Total Petroleum Hydrocarbons

Date Validated: Mar 14, 1997 10:10

Analyst: CG

Date Analyzed: Mar 13, 1997 17:56

Matrix: Solid

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

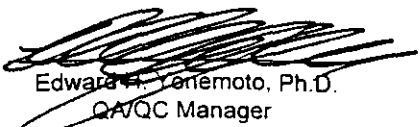
MATRIX DUPLICATE ANALYSIS						
Q.C. Sample ID 170587- 005	[A]	[B]	[C]	[D]	[E]	[F]
	Sample Result	Duplicate Result	Method Detection Limit	QC	LIMITS	Qualifier
				Relative Difference	Relative Difference	
Parameter	ppm	ppm	ppm	%	%	
Total Petroleum Hydrocarbons	< 7.50	< 7.50	7.50	N.C	30.0	

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 : 17A07B80

EPA 418.1 Total Petroleum Hydrocarbons

Date Validated: Mar 14, 1997 10:10

Analyst: CG

Date Analyzed: Mar 13, 1997 17:58

Matrix: Solid

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

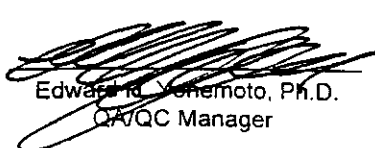
Parameter	BLANK SPIKE ANALYSIS						
	[A]	[B]	[C]	[D]	[E]	[F]	[G]
	Blank Result	Blank Spike Result	Blank Spike Amount	Method Detection Limit	QC	LIMITS	
	ppm	ppm	ppm	ppm	Blank Spike Recovery %	Recovery Range %	
Total Petroleum Hydrocarbons	< 7.50	199	202	7.50	98.5	65-135	

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 CHAIN OF CUSTODY REPORT CHRONOLOGY OF SAMPLES

K.E.I. Consultants, Inc.

Project Name: TNMPL Monument

Project ID: 610057-02-13

Project Manager: Ann Baker

Project Location: Site 13

XENCO COC#: 1-70587

Date Received in Lab: Mar 11, 1997 10:30 by RT

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 B13-1(1-2')	170587-001	BTEX	SW-846	ppm	Standard	Mar 7, 1997 08:30		Mar 11, 1997 by IF	Mar 11, 1997 21:40 by IF
2		TPH	EPA 418.1	ppm	Standard	Mar 7, 1997 08:30		Mar 13, 1997 by OG	Mar 13, 1997 17:18 by CG
3 B13-1(15-16')	170587-002	BTEX	SW-846	ppm	Standard	Mar 7, 1997 09:00		Mar 12, 1997 by IF	Mar 12, 1997 10:23 by IF
4		TPH	EPA 418.1	ppm	Standard	Mar 7, 1997 09:00		Mar 13, 1997 by OG	Mar 13, 1997 17:20 by CG
5 B13-2(1-2')	170587-003	BTEX	SW-846	ppm	Standard	Mar 7, 1997 09:10		Mar 12, 1997 by IF	Mar 12, 1997 10:41 by IF
6		TPH	EPA 418.1	ppm	Standard	Mar 7, 1997 09:10		Mar 13, 1997 by OG	Mar 13, 1997 17:22 by CG
7 B13-2(9-10')	170587-004	BTEX	SW-846	ppm	Standard	Mar 7, 1997 09:20		Mar 12, 1997 by IF	Mar 12, 1997 12:52 by IF
8		TPH	EPA 418.1	ppm	Standard	Mar 7, 1997 09:20		Mar 13, 1997 by OG	Mar 13, 1997 17:24 by CG
9 B13-3(1-2')	170587-005	BTEX	SW-846	ppm	Standard	Mar 7, 1997 09:40		Mar 12, 1997 by IF	Mar 12, 1997 13:09 by IF
10		TPH	EPA 418.1	ppm	Standard	Mar 7, 1997 09:40		Mar 13, 1997 by OG	Mar 13, 1997 17:36 by CG
11 B13-3(14-16')	170587-006	BTEX	SW-846	ppm	Standard	Mar 7, 1997 10:05		Mar 13, 1997 by IF	Mar 13, 1997 11:23 by IF
12		TPH	EPA 418.1	ppm	Standard	Mar 7, 1997 10:05		Mar 13, 1997 by OG	Mar 13, 1997 17:38 by CG
13 B13-4(1-2')	170587-007	BTEX	SW-846	ppm	Standard	Mar 7, 1997 10:15		Mar 12, 1997 by IF	Mar 12, 1997 13:43 by IF
14		TPH	EPA 418.1	ppm	Standard	Mar 7, 1997 10:15		Mar 13, 1997 by OG	Mar 13, 1997 17:40 by CG
15 B13-4(11-12')	170587-008	BTEX	SW-846	ppm	Standard	Mar 7, 1997 10:25		Mar 12, 1997 by IF	Mar 12, 1997 15:33 by IF
16		TPH	EPA 418.1	ppm	Standard	Mar 7, 1997 10:25		Mar 13, 1997 by OG	Mar 13, 1997 17:42 by CG
17 B13-5(1-2')	170587-009	BTEX	SW-846	ppm	Standard	Mar 7, 1997 10:30		Mar 12, 1997 by IF	Mar 12, 1997 15:50 by IF
18		TPH	EPA 418.1	ppm	Standard	Mar 7, 1997 10:30		Mar 13, 1997 by OG	Mar 13, 1997 17:44 by CG
19 B13-5(12-13')	170587-010	BTEX	SW-846	ppm	Standard	Mar 7, 1997 10:45		Mar 12, 1997 by IF	Mar 12, 1997 16:19 by IF
20		TPH	EPA 418.1	ppm	Standard	Mar 7, 1997 10:45		Mar 13, 1997 by OG	Mar 13, 1997 17:46 by CG



11381 Meadowglan Suite L Houston, Texas 77082
(713) 589-0692 Fax (713) 589-0695

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST FORM

Page 1 of 1

Lab. Batch # 170587-N

Contractor <u>Kel</u>		Phone (210) <u>680 3767</u>		No coolers this shipment: <u>2</u>		Contractor COC # <u>0003</u>			
Address <u>5304 WINDSWEPT ST. 100 SAN ANTONIO TX 78233</u>				Carrier:		Quote #:			
Project Name <u>TMPL MONUMENT</u>		Project Director <u>PAUL HALLNETT</u>		Airbill No.		P.O. No: <u>7199</u>			
Project Location <u>SITE 13</u>		Project Manager <u>Ann Baker</u>							
Sample Signature <u>BL</u>		Project No. <u>610057-15-02-13</u>							
SAMPLE CHARACTERIZATION									
Field ID	Date	Time	DEPTH	PRESERVATIVE				Container	Tank No:
				D	S	W	C		
				DEPTH	SOIL	WATER	COMPOUND	GRADES	
1 B13-1 1-2'	3/1/97	0830	1-2'	X	X	X	X	X	48 G
2 B13-1 15-16'		0900	15-16'	X	X	X	X	X	
3 B13-2 1-2'		0910	1-2'	X	X	X	X	X	
4 B13-2 9-10'		0920	9-10'	X	X	X	X	X	
5 B13-3 1-2'		0940	1-2'	X	X	X	X	X	
6 B13-3 14-16'		1005	14-16'	X	X	X	X	X	
7 B13-4 1-2'		1015	1-2'	X	X	X	X	X	
8 B13-4 11-12'		1025	11-12'	X	X	X	X	X	
9 B13-5 1-2'		1030	1-2'	X	X	X	X	X	
10 B13-5 12-13'		1045	12-13'	X	X	X	X	X	
Remarks: <u>Hold 8oz. Pending TP+ results</u>									

LABORATORY	SIGNATURE	DATE	TIME	SIGNATURE	DATE	TIME
<u>PH</u>	<u>BL</u>	<u>3/9/97</u>	<u>1730</u>	<u>Dennis Covello</u>	<u>3-10-97</u>	<u>0730</u>

Received For Laboratory by PH 3-11-97 1030

CERTIFICATE OF ANALYSIS SUMMARY 1-70730
K.E.I. Consultants, Inc.
Project Name: TNMPL Monument
Project ID: 610057-2-13
Project Manager: Ann Baker
Project Location: Site 13
Date Received in Lab: Mar 28, 1997 09:40 by CC
Date Report Faxed: Apr 2, 1997
XENCO contact: Carlos Castro/Edward Yonemoto

Analysis Requested	Lab ID:	170730-001	170730-002	170730-003	170730-004		
	Field ID:	B-13-2	B13-3	B13-4	B-13-5		
	Depth:	32-33'	32-33'	31-32'	32-33'		
BTEX Analyzed by EPA 8020		Date Analyzed - Analytical Results ppm (mg/L - mg/Kg)					
		Mar 31, 1997	Mar 31, 1997	Mar 31, 1997	Mar 31, 1997		
Benzene		< 0.020	< 0.040	< 0.040	< 0.10		
Toluene		< 0.020	< 0.040	< 0.040	< 0.10		
Ethylbenzene		< 0.020	< 0.040	< 0.040	< 0.10		
m,p-Xylenes		< 0.040	< 0.080	< 0.080	< 0.20		
o-Xylene		< 0.020	< 0.040	< 0.040	< 0.10		
Total BTEX		< 0.120	< 0.240	< 0.240	< 0.60		
TPH Analyzed by EPA 418.1		Date Analyzed - Analytical Results ppm (mg/L - mg/Kg)					
		Mar 29, 1997	Mar 29, 1997	Mar 29, 1997	Mar 29, 1997		
Total Petroleum Hydrocarbons		33.5	19.0	109	1370		

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

SW- 846 5030/8020 BTEX

Date Validated: Apr 1, 1997 09:00
 Date Analyzed: Mar 31, 1997 16:16
 QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: CB
 Matrix: Solid

BLANK SPIKE ANALYSIS

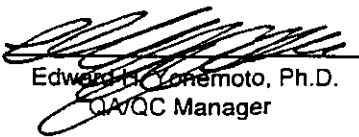
Parameter	[A]	[B]	[C]	[D]	[E]	[F]	Qualifier
	Blank Result	Blank Spike Result	Blank Spike Amount	Method Detection Limit	QC	LIMITS	
	ppm	ppm	ppm	ppm	Blank Spike Recovery %	Recovery Range %	
Benzene	< 0.0010	0.1060	0.1000	0.0010	106.0	65-135	
Toluene	< 0.0010	0.1070	0.1000	0.0010	107.0	65-135	
Ethylbenzene	< 0.0010	0.1080	0.1000	0.0010	108.0	65-135	
m,p-Xylenes	< 0.0020	0.2200	0.2000	0.0020	110.0	65-135	
o-Xylene	< 0.0010	0.1070	0.1000	0.0010	107.0	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 : 17A25B03

SW- 846 5030/3020 RTEX

Date Validated: Apr 1, 1997 09:00

Date Analyzed: Mar 31, 1997 16:34

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

Analyst: CB

Matrix: Solid

MATRIX SPIKE / MATRIX SPIKE DUPLICATE AND RECOVERY

Q.C. Sample ID 170723- 001	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	2.500	2.640	2.000	0.020	25.0	5.4		125.0		132.0		65-135	
	Toluene	< 0.020	2.440	2.600	2.000	0.020	25.0	6.3		122.0		130.0		65-135	
	Ethylbenzene	< 0.020	2.480	2.600	2.000	0.020	25.0	4.7		124.0		130.0		65-135	
	m,p-Xylenes	< 0.040	4.960	5.360	4.000	0.040	25.0	7.8		124.0		134.0		65-135	
	o-Xylene	< 0.020	2.460	2.620	2.000	0.020	25.0	6.3		123.0		131.0		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 : 17A30B18

EPA 418.1 Total Petroleum Hydrocarbons

Date Validated: Mar 31, 1997 15:00

Analyst: HL

Date Analyzed: Mar 29, 1997 16:06

Matrix: Solid

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

Parameter	BLANK SPIKE ANALYSIS						
	[A]	[B]	[C]	[D]	[E]	[F]	[G]
	Blank Result	Blank Spike Result	Blank Spike Amount	Method Detection Limit	QC	LIMITS	Qualifier
	ppm	ppm	ppm	ppm	Blank Spike Recovery %	Recovery Range %	
Total Petroleum Hydrocarbons	< 7.50	179	198	7.50	90.6	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: 17A30B18

EPA 418.1 Total Petroleum Hydrocarbons

Date Validated: Mar 31, 1997 15:00

Date Analyzed: Mar 29, 1997 16:21

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

Analyst: HL

Matrix: Solid

Q.C. Sample ID 170729- 003		MATRIX SPIKE / MATRIX SPIKE DUPLICATE AND RECOVERY										Qualifier	
		[A]	[B]	[C]	[D]	[E]	[F]	[G]	[H]	[I]	[J]		
Parameter		Sample Result	Matrix Spike Result	Matrix Spike Duplicate Result	Matrix Spike Amount	Method Detection Limit	Matrix Limit	Spike Relative Difference	QC	QC	QC	Matrix Spike Recovery Range	
		ppm	ppm	ppm	ppm	ppm	Relative Difference %	%	%	%	%	%	
Total Petroleum Hydrocarbons		16.00	196	188	198	7.50	30.0	4.2	91.1	87.0	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

ANALYTICAL CHAIN OF CUSTODY REPORT
CHRONOLOGY OF SAMPLES

K.E.I. Consultants, Inc.

XENCO COC#: 1-70730

Project Name: TNMPL Monument

Project ID: 610057-2-13

Project Manager: Ann Baker

Date Received in Lab: Mar 28, 1997 09:40 by CC

Project Location: Site 13

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 B-13-2 (32-33')	170730-001	BTEX	SW-846	ppm	Standard	Mar 24, 1997 17:30		Mar 31, 1997 by CB	Mar 31, 1997 22:18 by CB
2		TPH	EPA 418.1	ppm	Standard	Mar 24, 1997 17:30		Mar 29, 1997 by HL	Mar 29, 1997 16:30 by HL
3 B13-3 (32-33')	170730-002	BTEX	SW-846	ppm	Standard	Mar 25, 1997 09:20		Mar 31, 1997 by CB	Mar 31, 1997 22:36 by CB
4		TPH	EPA 418.1	ppm	Standard	Mar 25, 1997 09:20		Mar 29, 1997 by HL	Mar 29, 1997 16:33 by HL
5 B13-4 (31-32')	170730-003	BTEX	SW-846	ppm	Standard	Mar 24, 1997 15:15		Mar 31, 1997 by CB	Mar 31, 1997 22:53 by CB
6		TPH	EPA 418.1	ppm	Standard	Mar 24, 1997 15:15		Mar 29, 1997 by HL	Mar 29, 1997 16:36 by HL
7 B-13-5 (32-33')	170730-004	BTEX	SW-846	ppm	Standard	Mar 25, 1997 09:40		Mar 31, 1997 by CB	Mar 31, 1997 23:10 by CB
8		TPH	EPA 418.1	ppm	Standard	Mar 25, 1997 09:40		Mar 29, 1997 by HL	Mar 29, 1997 16:39 by HL

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE
ATTN: MR. TONY SAVOIE
P.O. BOX 1030
JAL. NEW MEXICO 88252
FAX: 505-395-2636

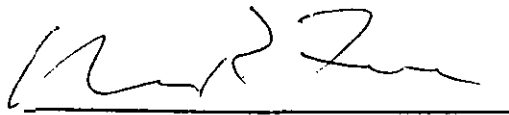
Receiving Date: 12/12/97
Sample Type: SOIL
Project #: TNM SITE 13
Project Name: PIG TRAP
Project Location: 1 MI. SOUTH MONUMENT, N.M.

Analysis Date: 12/14/97
Sampling Date: 12/12/97
Sample Condition: Intact/Iced

ELT#	FIELD CODE	TPH (DRO)					
		BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYLBENZENE (mg/kg)	m,p-XYLENE (mg/kg)	o-XYLENE (mg/kg)	C10-C28 (mg/kg)
13246	12-12-97 BH COMP.	<0.100	<0.100	<0.100	0.134	<0.100	<10
13247	12-12-97 SW COMP.	<0.100	0.169	0.116	0.357	0.102	<10

% IA	108	110	111	110	112	93
% EA	115	117	117	117	118	104
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001	<10

METHODS: EPA SW 846-8020, 5030, 8015M DRO


Michael R. Fowler

12-15-97
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE
ATTN: MRL TONY SAVOIE
P.O. BOX 1030
JAL, NEW MEXICO 88252
FAX: 505-395-2636

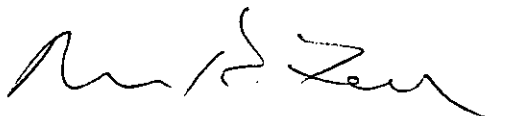
Receiving Date: 12/12/97
Sample Type: WATER
Project #: TNM SITE 13
Project Name: PIG TRAP
Project Location: 1 MI. SOUTH MONUMENT, N.M.

Analysis Date: 12/15/97
Sampling Date: 12/12/97
Sample Condition: Intact/Iced

ELT#	FIELD CODE	BENZENE (mg/l)	TOLUENE (mg/l)	ETHYLBENZENE (mg/l)	m,p-XYLENE (mg/l)	o-XYLENE (mg/l)
13248	12-12-97 WATER SAMPLE	<.001	<.001	<.001	0.004	0.002

% IA	108	110	111	110	112
% EA	102	102	102	100	103
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: EPA SW 846-8020,5030


Michael R. Fowler

12-15-97
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE COMPANY
ATTN: MR. TONY SAVOIE
P.O. BOX 1030
JAL, NM 88252
FAX: 505-395-2636
FAX: 505-397-5125

RECEIVING DATE: 12/05/97
SAMPLE TYPE: SOIL
PROJECT #: TNM SITE 13
PROJECT NAME: NONE GIVEN
PROJECT LOCATION: 1 MI. SOUTH MONUMENT, N.M.

ANALYSIS DATE: 12/05/97
SAMPLING DATE: 12/05/97
SAMPLE CONDITION: Intact/Iced

ELT#	FIELD CODE	TPH(DRO) C10-C28 (mg/kg)
13204	12-5-97 PARTICLIZED COMP. PILE	1,149

BLANK
% INSTRUMENT ACCURACY
% EXTRACTION ACCURACY

<10
94
1-

*after shoveling
proof of <10
for copper*

Methods: SW 846-8015M DRO


Michael R. Fowler

12-8-97
Date

CERTIFICATE OF ANALYSIS SUMMARY 1-71049
K.E.I. Consultants, Inc.
Project Name: Monument
Project ID: 610057 Site #13
Project Manager: Ann Baker
Project Location: Site #13
Date Received in Lab: May 6, 1997 10:00 by RT
Date Report Faxed: May 22, 1997
XENCO contact: Carlos Castro/Edward Yonemoto

Analysis Requested	Lab ID:	171049-001	171049-002	171049-003			
	Field ID:	MW-1	MW-2	MW-3			
	Depth:						
Metals (ICP) Analyzed by EPA 6010	Date Analyzed - Analytical Results			ppm (mg/L - mg/Kg)			
	May 13, 1997	May 13, 1997	May 13, 1997				
Aluminum	29.0	12.3	76.9				
Arsenic	< 0.05	< 0.05	< 0.05				
Barium	0.85	0.22	1.94				
Beryllium	< 0.005	< 0.005	< 0.005				
Cadmium	< 0.01	< 0.01	< 0.01				
Calcium	447	372	1120				
Chromium	< 0.05	< 0.05	0.06				
Cobalt	< 0.10	< 0.10	< 0.10				
Iron	18.7	7.67	43.6				
Lead	< 0.05	< 0.05	< 0.05				
Magnesium	56.3	53.3	75.6				
Manganese	0.60	0.54	1.39				
Molybdenum	< 0.20	< 0.20	< 0.20				
Potassium	10.4	7.65	15.5				
Silver	< 0.02	< 0.02	< 0.02				
Sodium	142	139	122				
Tin	7.50	2.89	17.8				
Vanadium	0.12	< 0.05	0.25				
Zinc	< 0.25	< 0.25	< 0.25				
Nickel	< 0.10	< 0.10	< 0.10				
Copper	< 0.25	< 0.25	< 0.25				
Boron	0.28	0.26	0.26				
Silicon	19.3	26.3	15.4				
Strontium	2.24	2.28	2.88				

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 1-71049
K.E.I. Consultants, Inc.
Project Name: Monument
Project ID: 610057 Site #13
Project Manager: Ann Baker
Project Location: Site #13
Date Received in Lab: May 6, 1997 10:00 by RT
Date Report Faxed: May 22, 1997
XENCO contact: Carlos Castro/Edward Yonemoto

Analysis Requested	Lab ID:	171049-001	171049-002	171049-003			
	Field ID:	MW-1	MW-2	MW-3			
	Depth:						
Mercury, Tot Analyzed by EPA 7470		Date Analyzed - Analytical Results ppm (mg/L - mg/Kg)					
		May 12, 1997	May 12, 1997	May 12, 1997			
Mercury		< 0.0010	< 0.0010	< 0.0010			
BTEX Analyzed by EPA 8020		Date Analyzed - Analytical Results ppm (mg/L - mg/Kg)					
		May 9, 1997	May 9, 1997	May 9, 1997			
Benzene		< 0.001	< 0.001	< 0.001			
Toluene		< 0.001	< 0.001	< 0.001			
Ethylbenzene		< 0.001	< 0.001	< 0.001			
m,p-Xylenes		< 0.002	< 0.002	< 0.002			
o-Xylene		< 0.001	< 0.001	< 0.001			
Total BTEX		< 0.006	< 0.006	< 0.006			
PAH Analyzed by EPA 8100		Date Analyzed - Analytical Results ppm (mg/L - mg/Kg)					
		May 15, 1997	May 15, 1997	May 15, 1997			
Acenaphthene		< 0.002	< 0.002	< 0.002			
Acenaphthylene		< 0.002	< 0.002	< 0.002			
Anthracene		< 0.002	< 0.002	< 0.002			
Benzo(a)anthracene		< 0.002	< 0.002	< 0.002			
Benzo(a)pyrene		< 0.002	< 0.002	< 0.002			
Benzo(b)fluoranthene		< 0.002	< 0.002	< 0.002			
Benzo(g,h,i)perylene		< 0.002	< 0.002	< 0.002			
Benzo(k)fluoranthene		< 0.002	< 0.002	< 0.002			
Chrysene		< 0.002	< 0.002	< 0.002			
Dibenzo(a,e)pyrene		< 0.002	< 0.002	< 0.002			
Dibenzo(a,h)anthracene		< 0.002	< 0.002	< 0.002			
Dibenz(a,j)acridine		< 0.002	< 0.002	< 0.002			
Fluoranthene		< 0.002	< 0.002	< 0.002			
Fluorene		< 0.002	< 0.002	< 0.002			

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

**CERTIFICATE OF ANALYSIS SUMMARY 1-71049****K.E.I. Consultants, Inc.****Project Name: Monument**

Project ID: 610057 Site #13

Project Manager: Ann Baker

Project Location: Site #13

Date Received in Lab: May 6, 1997 10:00 by RT

Date Report Faxed: May 22, 1997

XENCO contact: Carlos Castro/Edward Yonemoto

Analysis Requested	Lab ID:	171049-001	171049-002	171049-003			
	Field ID:	MW-1	MW-2	MW-3			
	Depth:						
Indeno(1,2,3-cd)pyrene		< 0.002	< 0.002	< 0.002			
3-Methylcholanthrene		< 0.002	< 0.002	< 0.002			
Naphthalene		< 0.002	< 0.002	< 0.002			
Phenanthrene		< 0.002	< 0.002	< 0.002			
Pyrene		< 0.002	< 0.002	< 0.002			
Dibenz(a,h)acridine		< 0.002	< 0.002	< 0.002			
Benzo(j)fluoranthene		< 0.002	< 0.002	< 0.002			
7H-Dibenzo(c,g)carbazole		< 0.002	< 0.002	< 0.002			
Dibenzo(a,h)pyrene		< 0.002	< 0.002	< 0.002			
Dibenzo(a,i)pyrene		< 0.002	< 0.002	< 0.002			
Bicarbonate Analyzed by SM 4500CO2D		Date Analyzed - Analytical Results ppm (mg/L - mg/Kg)					
		May 10, 1997	May 10, 1997	May 10, 1997			
Bicarbonate		358	360	325			
Carbonate Analyzed by SM4500CO2D		Date Analyzed - Analytical Results ppm (mg/L - mg/Kg)					
		May 10, 1997	May 10, 1997	May 10, 1997			
Carbonate		1.8	3.7	2.9			
TDS Analyzed by EPA 160.1		Date Analyzed - Analytical Results ppm (mg/L - mg/Kg)					
		May 9, 1997	May 9, 1997	May 9, 1997			
Total Dissolved Solids		1080	1100	1180			
Anions Analyzed by EPA 300.0		Date Analyzed - Analytical Results ppm (mg/L - mg/Kg)					
		May 8, 1997	May 8, 1997	May 8, 1997			
Sulfate		125	127	145			
Chloride		264	281	305			
TIC Mod. Analyzed by Mod. 415.1		Date Analyzed - Analytical Results ppm (mg/L - mg/Kg)					
		May 14, 1997	May 14, 1997	May 14, 1997			

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



CERTIFICATE OF ANALYSIS SUMMARY 1-71049

K.E.I. Consultants, Inc.

Project Name: Monument

Project ID: 610057 Site #13

Project Manager: Ann Baker

Project Location: Site #13

Date Received in Lab: May 6, 1997 10:00 by RT

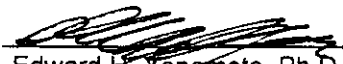
Date Report Faxed: May 22, 1997

XENCO contact: Carlos Castro/Edward Yonemoto

Analysis Requested	Lab ID:	171049-001	171049-002	171049-003			
	Field ID:	MW-1	MW-2	MW-3			
	Depth:						
Total Inorganic Carbon		80.0	56.6	73.3			

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

EPA 6010 Metals by ICP

Date Validated: May 15, 1997 09:00

Analyst: SA

Date Analyzed: May 13, 1997 11:30

Matrix: Liquid

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

Parameter	BLANK SPIKE ANALYSIS						
	[A]	[B]	[C]	[D]	[E]	[F]	[G] Qualifier
	Blank Result	Blank Spike Result	Blank Spike Amount	Method Detection Limit	QC	LIMITS	
	mg/L	mg/L	mg/L	mg/L	Blank Spike Recovery %	Recovery Range %	
Aluminum	< 0.01	0.72	1.00	0.01	72.0	70-125	
Arsenic	< 0.050	0.869	1.000	0.050	86.9	70-125	
Barium	< 0.002	0.429	0.500	0.002	85.8	70-125	
Beryllium	< 0.0050	0.1808	0.2000	0.0050	90.4	70-125	
Boron	< 0.03	1.20	1.56	0.03	76.9	70-125	
Cadmium	< 0.010	0.162	0.200	0.010	81.0	70-125	
Calcium	< 0.01	1.82	2.00	0.01	91.0	70-125	
Chromium	< 0.013	0.433	0.500	0.013	86.6	70-125	
Cobalt	< 0.003	0.423	0.500	0.003	84.6	70-125	
Copper	< 0.008	0.443	0.500	0.008	88.6	70-125	
Iron	< 0.006	0.814	1.000	0.006	81.4	70-125	
Lead	< 0.03	0.85	1.00	0.03	85.0	70-125	
Magnesium	< 0.01	1.79	2.00	0.01	89.5	70-125	
Nickel	< 0.03	0.46	0.50	0.03	92.0	70-125	
Potassium	< 0.0250	2.1275	2.0000	0.0250	106.4	70-125	
Silver	< 0.010	0.334	0.400	0.010	83.5	70-125	
Sodium	< 0.0250	1.8363	2.0000	0.0250	91.8	70-125	
Strontium	< 0.025	1.171	1.560	0.025	75.1	70-125	
Vanadium	< 0.00	0.44	0.50	0.00	88.0	70-125	
Zinc	< 0.008	0.431	0.500	0.008	86.2	70-125	

 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

EPA 6010 Metals by ICP

Date Validated: May 15, 1997 09:00

Analyst: SA

Date Analyzed: May 13, 1997 19:46

Matrix: Liquid

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

MATRIX DUPLICATE ANALYSIS						
Q.C. Sample ID 171051- 001	[A]	[B]	[C]	[D]	[E]	[F]
	Sample Result	Duplicate Result	Method Detection Limit	QC Relative Difference	LIMITS Relative Difference	
Parameter	mg/L	mg/L	mg/L	%	%	Qualifier
Aluminum	21.16	16.94	0.01	22.2	25.0	
Arsenic	< 0.050	< 0.050	0.050	N.C	25.0	
Barium	0.746	0.766	0.002	2.6	25.0	
Beryllium	< 0.0050	< 0.0050	0.0050	N.C	25.0	
Boron	0.148	0.139	0.025	6.3	25.0	
Cadmium	< 0.010	< 0.010	0.010	N.C	25.0	
Calcium	1170	1110	0.01	5.3	25.0	
Chromium	0.039	0.039	0.013	0.0	25.0	
Cobalt	0.011	0.013	0.003	16.7	25.0	
Copper	0.014	0.014	0.008	0.0	25.0	
Iron	13.43	13.26	0.01	1.3	25.0	
Lead	< 0.025	< 0.025	0.025	N.C	25.0	
Magnesium	39.95	37.77	0.01	5.6	25.0	
Manganese	0.291	0.300	0.006	3.0	25.0	
Molybdenum	< 0.025	< 0.025	0.025	N.C	25.0	
Nickel	< 0.025	0.157	0.025	N.C	25.0	
Potassium	7.841	7.730	0.025	1.4	25.0	
Silicon	24.49	16.18	0.03	40.9	25.0	A
Silver	< 0.010	< 0.010	0.010	N.C	25.0	

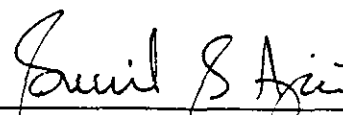
(A) Variability in duplicate measurement attributed to sample non-homogeneity.

 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

EPA 6010 Metals by ICP

Date Validated: May 15, 1997 09:00

Analyst: SA

Date Analyzed: May 13, 1997 19:46

Matrix: Liquid

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

MATRIX DUPLICATE ANALYSIS						
Q.C. Sample ID 171051- 001	[A] Sample Result mg/L	[B] Duplicate Result mg/L	[C] Method Detection Limit mg/L	[D]	[E]	[F] Qualifier
				QC Relative Difference %	LIMITS Relative Difference %	
Parameter						
Sodium	80.69	76.85	0.03	4.9	25.0	
Strontium	2.164	2.036	0.025	6.1	25.0	
Tin	5.533	5.160	0.025	7.0	25.0	
Vanadium	0.054	0.058	0.003	7.1	25.0	
Zinc	0.090	0.087	0.008	3.4	25.0	

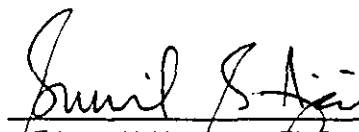
(A) Variability in duplicate measurement attributed to sample non-homogeneity.

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 : 17A18C05

EPA 6010 Metals by ICP

Date Validated: May 15, 1997 09:00

Date Analyzed: May 13, 1997 11:30

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

Analyst: SA

Matrix: Liquid

Q.C. Sample ID 171046- 001	MATRIX DUPLICATE ANALYSIS					MATRIX SPIKE ANALYSIS				
	[A] Sample Result mg/L	[B] Duplicate Result mg/L	[C] Method Detection Limit mg/L	[D] QC Relative Difference %	[E] LIMITS Relative Difference %	[F] Matrix Spike Result mg/L	[G] Matrix Spike Amount mg/L	[H] QC Matrix Spike Recovery %	[I] LIMITS Recovery Range %	[J] Qualifier
Aluminum	30.68	30.75	0.01	0.2	25.0	40.7	12.5	79.8	70-125	
Arsenic	< 0.050	< 0.050	0.050	N.C	25.0	0.89	1.00	88.7	70-125	
Barium	1.031	1.233	0.002	17.8	25.0	1.25	0.50	44.6	70-125	B
Beryllium	< 0.0050	< 0.0050	0.0050	N.C	25.0	0.179	0.200	89.3	70-125	
Boron	0.173	0.178	0.025	2.8	25.0	2.51	3.13	74.8	70-125	
Cadmium	< 0.010	< 0.010	0.010	N.C	25.0	0.16	0.20	79.5	70-125	
Calcium	114	134	0.01	16.1	25.0	133	12.5	152.0	70-125	A,B
Chromium	0.031	0.030	0.013	3.3	25.0	0.44	0.50	81.0	70-125	
Cobalt	0.037	0.032	0.003	14.5	25.0	0.39	0.50	69.8	70-125	B
Copper	0.026	0.030	0.008	14.3	25.0	0.46	0.50	86.8	70-125	
Iron	38.92	37.58	0.01	3.5	25.0	45.1	12.5	49.5	70-125	A,B
Lead	< 0.025	< 0.025	0.025	N.C	25.0	0.80	1.00	80.2	70-125	
Magnesium	21.29	23.91	0.01	11.6	25.0	31.9	12.5	85.0	70-125	

(A) High analyte concentration affects spike recovery.

(B) Post-digestion spike within acceptance limits.

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

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

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

Certificate Of Quality Control for Batch : 17A18C05

EPA 6010 Metals by ICP

Date Validated: May 15, 1997 09:00

Date Analyzed: May 13, 1997 11:30

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

Analyst: SA

Matrix: Liquid

Q.C. Sample ID 171046- 001 Parameter		MATRIX DUPLICATE ANALYSIS						MATRIX SPIKE ANALYSIS							
		[A] Sample Result mg/L	[B] Duplicate Result mg/L	[C] Method Detection Limit mg/L	[D]		[E]		[F] Matrix Spike Result mg/L	[G] Matrix Spike Amount mg/L	[H]		[I]		[G] Qualifier
					QC	Relative Difference %	LIMITS	Relative Difference %			QC	Recovery Range %			
Manganese		1.263	1.503	0.006	17.4	25.0	12.16	12.50	87.2			70-125			
Molybdenum		< 0.025	< 0.025	0.025	N.C	25.0	0.55	0.63	88.6			70-125			
Nickel		< 0.025	< 0.025	0.025	N.C	25.0	0.40	0.50	80.2			70-125			
Potassium		7.715	8.064	0.025	4.4	25.0	19.08	12.50	90.9			70-125			
Silver		< 0.010	< 0.010	0.010	N.C	25.0	0.33	0.40	81.3			70-125			
Sodium		56.80	67.17	0.03	16.7	25.0	72.3	12.5	123.7			70-125			
Strontium		0.921	1.095	0.025	17.3	25.0	3.05	3.13	68.1			70-125		B	
Vanadium		0.128	0.142	0.003	10.4	25.0	0.51	0.50	77.2			70-125			
Zinc		0.180	0.201	0.008	11.0	25.0	0.57	0.50	78.6			70-125			

(A) High analyte concentration affects spike recovery.

(B) Post-digestion spike within acceptance limits.

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

Matrix Spike Recovery [H] = $100 \times (F-A)/[G]$

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

SW846- 7470 Total Mercury

Date Validated: May 15, 1997 14:15

Analyst: EZ

Date Analyzed: May 12, 1997 13:22

Matrix: Liquid

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

		MATRIX DUPLICATE ANALYSIS						MATRIX SPIKE ANALYSIS					
Q.C. Sample ID 171051- 002	Parameter	[A]	[B]	[C]	[D]	[E]	[F]	[G]	[H]	[I]	[J]	[K]	
		Sample Result mg/L	Duplicate Result mg/L	Method Detection Limit mg/L	QC	LIMITS							
					Relative Difference %	Relative Difference %							Matrix Spike Recovery %
		< 0.0010	< 0.0010	0.0010	N.C	25.0	0.0025	0.0025	100.0		70-125		
	Mercury												

Relative Difference [D] = $200 \cdot (B-A)/(B+A)$
 Matrix Spike Recovery [H] = $100 \cdot (F-A)/(G)$
 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
 Edward H. Yonemoto, Ph.D.
 QA/QC Manager



Certificate Of Quality Control for Batch : 17A05B25

SW846- 7470 Total Mercury

Date Validated: May 15, 1997 14:15

Date Analyzed: May 12, 1997 12:58

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

Analyst: EZ

Matrix: Liquid

Q.C. Sample ID 171047- 001		MATRIX DUPLICATE ANALYSIS					MATRIX SPIKE ANALYSIS				
		[A] Sample Result mg/L	[B] Duplicate Result mg/L	[C] Method Detection Limit mg/L	[D] QC Relative Difference %	[E] LIMITS Relative Difference %	[F] Matrix Spike Result mg/L	[G] Matrix Spike Amount mg/L	[H] QC Matrix Spike Recovery %	[I] LIMITS Recovery Range %	[J] Qualifier
Parameter		< 0.0010	< 0.0010	0.0010	N.C	25.0	0.0026	0.0025	104.0	70-125	
Mercury											

Relative Difference [D] = $200 \cdot (B-A)/(B+A)$
Matrix Spike Recovery [H] = $100 \cdot (F-A)/[G]$
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 : 17A05B25

SW846- 7470 Total Mercury

Date Validated: May 15, 1997 14:15

Analyst: EZ

Date Analyzed: May 12, 1997 12:55

Matrix: Liquid

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

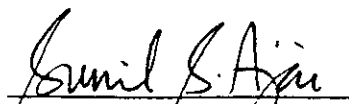
BLANK SPIKE ANALYSIS							
Parameter	[A]	[B]	[C]	[D]	[E]	[F]	[G]
	Blank Result	Blank Spike Result	Blank Spike Amount	Method Detection Limit	QC	LIMITS	
					Blank Spike Recovery	Recovery Range	
					%	%	
Mercury	< 0.0010	0.0022	0.0025	0.0010	88.0	70-125	

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 : 17A04B61

SW- 846 5030/8020 BTEX

Date Validated: May 12, 1997 14:50

Date Analyzed: May 9, 1997 13:42

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

Analyst: IF

Matrix: Liquid

MATRIX SPIKE / MATRIX SPIKE DUPLICATE AND RECOVERY

Q.C. Sample ID 171048- 001		[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]	[G]	[H]	[I]	[J] Qualifier
								QC	QC	QC	Matrix Spike Recovery Range %	
Parameter								Spike Relative Difference %	Matrix Spike Recovery %	M.S.D. Recovery %		
Benzene		< 0.0010	0.0868	0.0864	0.1000	0.0010	25.0	0.5	86.8	86.4	65-135	
Toluene		< 0.0010	0.1160	0.1120	0.1000	0.0010	25.0	3.5	116.0	112.0	65-135	
Ethylbenzene		< 0.0010	0.1180	0.1130	0.1000	0.0010	25.0	4.3	118.0	113.0	65-135	
m,p-Xylenes		< 0.0020	0.2420	0.2330	0.2000	0.0020	25.0	3.8	121.0	116.5	65-135	
o-Xylene		< 0.0010	0.1160	0.1120	0.1000	0.0010	25.0	3.5	116.0	112.0	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

SW- 846 5030/8020 BTEX

Date Validated: May 12, 1997 14:50

Analyst: IF

Date Analyzed: May 9, 1997 10:17

Matrix: Liquid

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	0.1130	0.1000	0.0010	113.0	65-135	
Toluene	< 0.0010	0.1160	0.1000	0.0010	116.0	65-135	
Ethylbenzene	< 0.0010	0.1170	0.1000	0.0010	117.0	65-135	
m,p-Xylenes	< 0.0020	0.2410	0.2000	0.0020	120.5	65-135	
o-Xylene	< 0.0010	0.1150	0.1000	0.0010	115.0	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 : 17A34B35

SW-846 8100 PAHs by GC-MS

Date Validated: May 15, 1997 17:56

Date Analyzed: May 14, 1997 22:20

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

Analyst: MM

Matrix: Liquid

BLANK SPIKE / BLANK SPIKE DUPLICATE AND RECOVERY

Parameter	[A]	[B]	[C]	[D]	[E]	Blank Limit Relative Difference %	[F]	[G]	[H]	[I]	[J]
	Blank Result mg/L	Blank Spike Result mg/L	Blank Spike Duplicate Result mg/L	Blank Spike Amount mg/L	Method Detection Limit mg/L		QC	QC	QC	Blank Spike Recovery Range %	Qualifier
Acenaphthene	< 0.0020	0.0658	0.0670	0.1000	0.0020	31.0	1.8	65.8	67.0	46-118	
4-Chloro-3-Methylphenol	< 0.0020	0.0398	0.0332	0.1000	0.0020	42.0	18.1	39.8	33.2	23-97	
2-Chlorophenol	< 0.0020	0.0630	0.0644	0.1000	0.0020	40.0	2.2	63.0	64.4	27-123	
1,4-Dichlorobenzene	< 0.0020	0.0702	0.0724	0.1000	0.0020	28.0	3.1	70.2	72.4	36-97	
2,4-Dinitrotoluene	< 0.0020	0.0628	0.0632	0.1000	0.0020	38.0	0.6	62.8	63.2	24-96	
N-Nitroso-di-n-propylamine	< 0.0040	0.0742	0.0738	0.1000	0.0040	38.0	0.5	74.2	73.8	41-116	
4-Nitrophenol	< 0.0040	0.0250	0.0248	0.1000	0.0040	50.5	0.8	25.0	24.8	10-80	
Pentachlorophenol	< 0.0010	0.0738	0.0706	0.1000	0.0010	50.0	4.4	73.8	70.6	9-103	
Phenol	< 0.0010	0.0222	0.0224	0.1000	0.0010	42.0	0.9	22.2	22.4	12-89	
Pyrene	< 0.0020	0.0852	0.0840	0.1000	0.0020	31.0	1.4	85.2	84.0	26-127	
1,2,4-Trichlorobenzene	< 0.0010	0.0736	0.0714	0.1000	0.0010	28.0	3.0	73.6	71.4	39-98	

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

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

B.S.D. = Blank Spike Duplicate

B.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 : 17A20A24

SM4500C02D Carbonate

Date Validated: May 14, 1997 15:30

Analyst: CG

Date Analyzed: May 10, 1997 09:20

Matrix: Liquid

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

MATRIX DUPLICATE ANALYSIS						
Q.C. Sample ID 171047- 001	[A]	[B]	[C]	[D]	[E]	[F] Qualifier
	Sample Result	Duplicate Result	Method Detection Limit	QC	LIMITS	
	ppm	ppm	ppm	Relative Difference %	Relative Difference %	
Parameter						
Carbonate	< 1.00	< 1.00	1.00	N.C	25.0	

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

SM 4500C02D Bicarbonate

Date Validated: May 14, 1997 15:30

Analyst: CG

Date Analyzed: May 10, 1997 09:20

Matrix: Liquid

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

MATRIX DUPLICATE ANALYSIS						
Q.C. Sample ID 171047- 001	[A] Sample Result	[B] Duplicate Result	[C] Method Detection Limit	[D] QC Relative Difference	[E] LIMITS Relative Difference	[F] Qualifier
	mg/L	mg/L	mg/L	%	%	
Bicarbonate	127	127	0.5	0.0	25.0	

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 : 17A19A95

EPA 160.1 Total Dissolved Solids

Date Validated: May 9, 1997 13:45

Analyst: CG

Date Analyzed: May 9, 1997 09:40

Matrix: Liquid

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

MATRIX DUPLICATE ANALYSIS						
Q.C. Sample ID 171046- 001	[A] Sample Result	[B] Duplicate Result	[C] Method Detection Limit	[D] QC Relative Difference %	[E] LIMITS Relative Difference %	[F] Qualifier
	mg/L	mg/L	mg/L			
Parameter						
Total Dissolved Solids	526	504	4.0	4.3	25.0	

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 : 17A10A40

EPA 300.0 Anions by Ion Chromatography

Date Validated: May 9, 1997 12:00

Date Analyzed: May 8, 1997 12:23

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

Analyst: JS

Matrix: Liquid

BLANK SPIKE / BLANK SPIKE DUPLICATE AND RECOVERY													
Parameter	[A] Blank Result mg/L	[B] Blank Spike Result mg/L	[C] Blank Spike Duplicate Result mg/L	[D] Blank Spike Amount mg/L	[E] Method Detection Limit mg/L	Blank Limit Relative Difference %	[F]	[G]	[H]	[I]	[J] Qualifier		
							QC	QC	QC	Blank Spike Recovery Range %			
Chloride	< 0.050	5.070	5.090	5.000	0.050	20.0	0.4	101.4	101.8	70-125			
Sulfate	< 0.10	4.97	5.06	5.00	0.10	20.0	1.8	99.4	101.2	70-125			

Spike Relative Difference [F] = $200 \times (B-C)/(B+C)$
Blank Spike Recovery [G] = $100 \times (B-A)/[D]$
B.S.D. = Blank Spike Duplicate
B.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

EPA 300.0 Anions by Ion Chromatography

Date Validated: May 9, 1997 12:00

Analyst: JS

Date Analyzed: May 8, 1997 12:55

Matrix: Liquid

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

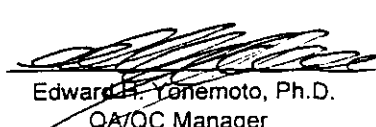
MATRIX DUPLICATE ANALYSIS						
Q.C. Sample ID 171046- 001	[A] Sample Result mg/L	[B] Duplicate Result mg/L	[C] Method Detection Limit mg/L	[D]	[E]	[F] Qualifier
				QC Relative Difference %	LIMITS Relative Difference %	
Parameter						
Chloride	72.400	75.900	0.050	4.7	20.0	
Sulfate	59.60	62.30	0.10	4.4	20.0	

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

MOD. 415.1 Total Inorganic Carbon

Date Validated: May 19, 1997 09:00

Analyst: IF

Date Analyzed: May 14, 1997 09:22

Matrix: Liquid

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

BLANK SPIKE ANALYSIS							
Parameter	[A]	[B]	[C]	[D]	[E]	[F]	Qualifier
	Blank	Blank Spike	Blank	Method	QC	LIMITS	
	Result	Result	Spike	Detection	Blank Spike	Recovery	
	ppm	ppm	Amount	Limit	Recovery	Range	
			ppm	ppm	%	%	
Total Inorganic Carbon	< 1.0	20.6	20.0	1.0	103.0	70-120	

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

MOD. 415.1 Total Inorganic Carbon

Date Validated: May 19, 1997 09:00

Date Analyzed: May 14, 1997 11:41

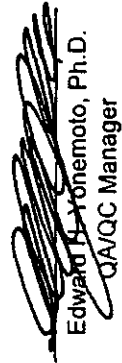
QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: IF

Matrix: Liquid

Q.C. Sample ID 171049- 002	MATRIX DUPLICATE ANALYSIS						MATRIX SPIKE ANALYSIS					
	[A] Sample Result ppm	[B] Duplicate Result ppm	[C] Method Detection Limit ppm	[D]		[E] LIMITS Relative Difference % %	[F] Matrix Spike Result ppm	[G] Matrix Spike Amount ppm	[H]	[I]	[G] Qualifier	
				QC	Relative Difference %				QC	Recovery Range %		
Parameter	56.61	55.44	1.00	2.1	20.0	74.6	20.0	90.0	70-120			
Total Inorganic Carbon												

Relative Difference [D] = $200 \cdot (B-A)/(B+A)$
 Matrix Spike Recovery [H] = $100 \cdot (F-A)/[G]$
 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 CHAIN OF CUSTODY REPORT CHRONOLOGY OF SAMPLES

K.E.I. Consultants, Inc.

Project ID: 610057 Site #13
Project Manager: Ann Baker
Project Location: Site #13

Project Name: Monument

XENCO COC#: 1-71049

Date Received in Lab: May 6, 1997 10:00 by RT

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 MW-1	171049-001	BTEX	SW-846	ppm	Standard	May 2, 1997 15:40		May 9, 1997 by IF	May 9, 1997 12:29 by IF
2		PAH	SW-846 8100	mg/L	Standard	May 2, 1997 15:40		May 9, 1997 by CY	May 15, 1997 04:36 by MM
3		TDS	EPA 160.1	mg/L	Standard	May 2, 1997 15:40		May 8, 1997 by CG	May 9, 1997 10:05 by CG
4		Anions	EPA 300.0	mg/L	Standard	May 2, 1997 15:40		May 8, 1997 by JS	May 8, 1997 14:13 by JS
5		Carbonate	SM4500CO2D	ppm	Standard	May 2, 1997 15:40		May 10, 1997 by CG	May 10, 1997 09:40 by CG
6		Bicarbonate	SM 4500CO2D	mg/L	Standard	May 2, 1997 15:40		May 10, 1997 by CG	May 10, 1997 09:40 by CG
7		Metals (ICP)	EPA 6010	mg/L	Standard	May 2, 1997 15:40		May 9, 1997 by EZ	May 13, 1997 18:51 by SA
8		Mercury, Tot	SW846-7470	mg/L	Standard	May 2, 1997 15:40		May 9, 1997 by EZ	May 12, 1997 13:15 by EZ
9		TIC Mod.	MOD. 415.1	ppm	Standard	May 2, 1997 15:40		May 14, 1997 by IF	May 14, 1997 14:59 by IF
10 MW-2	171049-002	BTEX	SW-846	ppm	Standard	May 2, 1997 15:55		May 9, 1997 by IF	May 9, 1997 12:47 by IF
11		PAH	SW-846 8100	mg/L	Standard	May 2, 1997 15:55		May 9, 1997 by CY	May 15, 1997 05:22 by MM
12		TDS	EPA 160.1	mg/L	Standard	May 2, 1997 15:55		May 8, 1997 by CG	May 9, 1997 10:10 by CG
13		Anions	EPA 300.0	mg/L	Standard	May 2, 1997 15:55		May 8, 1997 by JS	May 8, 1997 14:22 by JS
14		Carbonate	SM4500CO2D	ppm	Standard	May 2, 1997 15:55		May 10, 1997 by CG	May 10, 1997 09:45 by CG
15		Bicarbonate	SM 4500CO2D	mg/L	Standard	May 2, 1997 15:55		May 10, 1997 by CG	May 10, 1997 09:45 by CG
16		Metals (ICP)	EPA 6010	mg/L	Standard	May 2, 1997 15:55		May 9, 1997 by EZ	May 13, 1997 19:19 by SA
17		Mercury, Tot	SW846-7470	mg/L	Standard	May 2, 1997 15:55		May 9, 1997 by EZ	May 12, 1997 13:16 by EZ
18		TIC Mod.	MOD. 415.1	ppm	Standard	May 2, 1997 15:55		May 14, 1997 by IF	May 14, 1997 11:37 by IF
19 MW-3	171049-003	BTEX	SW-846	ppm	Standard	May 2, 1997 16:15		May 9, 1997 by IF	May 9, 1997 13:06 by IF
20		PAH	SW-846 8100	mg/L	Standard	May 2, 1997 16:15		May 9, 1997 by CY	May 15, 1997 06:06 by MM
21		TDS	EPA 160.1	mg/L	Standard	May 2, 1997 16:15		May 8, 1997 by CG	May 9, 1997 10:15 by CG
22		Anions	EPA 300.0	mg/L	Standard	May 2, 1997 16:15		May 8, 1997 by JS	May 8, 1997 14:34 by JS
23		Carbonate	SM4500CO2D	ppm	Standard	May 2, 1997 16:15		May 10, 1997 by CG	May 10, 1997 09:50 by CG
24		Bicarbonate	SM 4500CO2D	mg/L	Standard	May 2, 1997 16:15		May 10, 1997 by CG	May 10, 1997 09:50 by CG
25		Metals (ICP)	EPA 6010	mg/L	Standard	May 2, 1997 16:15		May 9, 1997 by EZ	May 13, 1997 19:26 by SA
26		Mercury, Tot	SW846-7470	mg/L	Standard	May 2, 1997 16:15		May 9, 1997 by EZ	May 12, 1997 13:17 by EZ
27		TIC Mod.	MOD. 415.1	ppm	Standard	May 2, 1997 16:15		May 14, 1997 by IF	May 14, 1997 12:19 by IF



11381 Meadowglen Suite L Houston, Texas 77082
(713) 589-0892 Fax (713) 589-0695

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST FORM

Page 1 of 1
Lab. Batch # 11049-H

Contractor K.E. Consultants		Phone (1800) 253-0507		No. of CONTAINERS		No. coolers this shipment: Carrier: UPS		Contractor COC #										
Address 4800 Wirebach Drive Suite 100 San Antonio TX		Project Director Paul Hartnett		Airbill No.		Quote #:		P.O. No:										
Project Name Monument		Project Manager Ann Baker		Project No. 610057 site #13		Turn-around ASAP 24 hrs 48 hrs Standard		LAB ONLY ID #										
Project Location Site #13		Project Signature		Project No.		Remarks												
SAMPLE CHARACTERIZATION																		
Field ID	Date	Time	DEPTH	SOIL	WATER	COMPS	GRA	Container	Preservative	Unl	Dies	Ker	Unknown	Waste Oil	PTT No:	Tank No:	Sample Description	Total
MW-1	5-2-97	1540																7
MW-2	5-2-97	1555																7
MW-3	5-2-97	1615																7
Remarks																		
Requisitioned by: [Signature]																		
DATE: 05-15-97 TIME: 0600																		
Received by: [Signature]																		
DATE: 5-6-97 TIME: 1000																		
Relinquished For Laboratory by: [Signature]																		

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

* Pre-scheduling is recommended

Precision Analytical Services

ANALYTICAL REPORT 1-71049

for

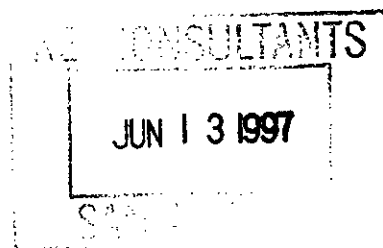
K.E.I. Consultants, Inc.

Project Manager: Ann Baker

Project Name: Monument

Project Id: 610057 Site #13

May 22, 1997



HOUSTON - DALLAS - SAN ANTONIO

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

May 22, 1997

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

Reference: **XENCO Report No.: 1-71049**
Project Name: Monument
Project ID: 610057 Site #13
Project Address: Site #13

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 1-71049. 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. 1-71049 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 Yamamoto, 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!

CERTIFICATE OF ANALYSIS SUMMARY 1-71967

K.E.I. Consultants, Inc.
Project Name: TNMPL Monument

Project ID: 610057
Project Manager: Mike Hawthorne
Project Location: Site 13

Date Received in Lab: Aug 25, 1997 10:15 by LY

Date Report Faxed: Aug 27, 1997

XENCO contact: Carlos Castro/Edward Yonemoto

Analysis Requested	<i>Lab ID:</i>	171967-001	171967-002	171967-003			
	<i>Field ID:</i>	MW-1	MW-2	MW-3			
	<i>Depth:</i>						
BTEX Analyzed by EPA 8020	Date Analyzed - Analytical Results ppm (mg/L - mg/Kg)						
	Aug 26, 1997	Aug 26, 1997	Aug 26, 1997				
Benzene	< 0.001	< 0.004	< 0.001				
Toluene	< 0.001	< 0.004	< 0.001				
Ethylbenzene	< 0.001	< 0.004	< 0.001				
m,p-Xylenes	< 0.002	< 0.008	< 0.002				
o-Xylene	< 0.001	< 0.004	< 0.001				
Total BTEX	< 0.006	< 0.024	< 0.006				

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 Quality Control for Batch: 17A25C85

SW- 846 5030/8020 BTEx

Date Validated: Aug 26, 1997 11:00

Date Analyzed: Aug 25, 1997 18:17

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

Analyst: HL

Matrix: Liquid

BLANK SPIKE / BLANK SPIKE DUPLICATE AND RECOVERY

Parameter	[A]	[B]	[C]	[D]	[E]	Blank	[F]	[G]	[H]	[I]	[J]
	Blank Result ppm	Blank Spike Result ppm	Blank Spike Duplicate Result ppm	Blank Spike Amount ppm	Method Detection Limit ppm	Limit Relative Difference %	QC	QC	QC	Blank Spike Recovery Range %	Qualifier
							Spike Relative Difference %	Blank Spike Recovery %	B.S.D. Recovery %		
Benzene	< 0.0010	0.1000	0.1030	0.1000	0.0010	25.0	3.0	100.0	103.0	65-135	
Toluene	< 0.0010	0.1000	0.1010	0.1000	0.0010	25.0	1.0	100.0	101.0	65-135	
Ethylbenzene	< 0.0010	0.1030	0.1070	0.1000	0.0010	25.0	3.8	102.9	106.9	65-135	
m,p-Xylenes	< 0.0020	0.2100	0.2160	0.2000	0.0020	25.0	2.8	104.9	107.9	65-135	
o-Xylene	< 0.0010	0.1050	0.1050	0.1000	0.0010	25.0	0.0	104.9	104.9	65-135	

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

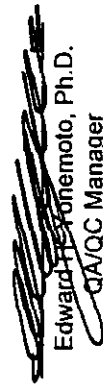
Blank Spike Recovery [G] = $100 \cdot (B-A)/[D]$

B.S.D. = Blank Spike Duplicate

B.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

ANALYTICAL CHAIN OF CUSTODY REPORT
CHRONOLOGY OF SAMPLES

K.E.I. Consultants, Inc.

Project ID: 610057

Project Manager: Mike Hawthorne

Project Location: Site 13

Project Name: TNMPL Monument

XENCO COC#: 1-71967

Date Received in Lab: Aug 25, 1997 10:15 by LY

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 MW-1	171967-001	BTEX	SW-846	ppm	Standard	Aug 15, 1997 13:30		Aug 26, 1997 by HL	Aug 26, 1997 01:14 by HL
2 MW-2	171967-002	BTEX	SW-846	ppm	Standard	Aug 15, 1997 13:45		Aug 26, 1997 by HL	Aug 26, 1997 02:29 by HL
3 MW-3	171967-003	BTEX	SW-846	ppm	Standard	Aug 15, 1997 14:00		Aug 26, 1997 by HL	Aug 26, 1997 01:33 by HL

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST FORM

[illegible]

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

*** Pre-scheduling is recommended**

Precision Analytical Services

ANALYTICAL REPORT 1-71967

for

SEP - 4 1997

K.E.I. Consultants, Inc.

Project Manager: Mike Hawthorne

Project Name: TNMPL Monument

Project Id: 610057

August 27, 1997



HOUSTON - DALLAS - SAN ANTONIO

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

August 27, 1997

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

Reference: **XENCO Report No.: 1-71967**
Project Name: TNMPL Monument
Project ID: 610057
Project Address: Site 13

Dear Mike Hawthorne:

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 1-71967. 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. 1-71967 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 Zornate, 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!

CERTIFICATE OF ANALYSIS SUMMARY 1-72736

K.E.I. Consultants, Inc.
Project Name: TNMPL-Site #13

Project ID: 610057
 Project Manager: Theresa Nix
 Project Location: Monument, NM

Date Received in Lab: Nov 4, 1997 10:30 by CC

Date Report Faxed: Nov 5, 1997

XENCO contact: Carlos Castro/Edward Yonemoto

Analysis Requested	Lab ID:	172736-001	172736-002	172736-003			
	Field ID:	MW-1	MW-2	MW-3			
	Depth:						
BTEX Analyzed by EPA 8020		Date Analyzed - Analytical Results ppm (mg/L - mg/Kg)					
		Nov 4, 1997	Nov 4, 1997	Nov 4, 1997			
Benzene		< 0.001	< 0.001	< 0.001			
Toluene		< 0.001	< 0.001	< 0.001			
Ethylbenzene		< 0.001	< 0.001	< 0.001			
m,p-Xylenes		< 0.002	< 0.002	< 0.002			
o-Xylene		< 0.001	< 0.001	< 0.001			
Total BTEX		< 0.006	< 0.006	< 0.006			

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 Quality Control for Batch : 17A25D51

SW- 846 5030/8020 BTX

Date Validated: Nov 5, 1997 09:00

Date Analyzed: Nov 4, 1997 13:07

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

Analyst: HL

Matrix: Liquid

MATRIX SPIKE / MATRIX SPIKE DUPLICATE AND RECOVERY										
Q.C. Sample ID 172734- 001	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		[J] Qualifier
								Spike Relative Difference %	M.S.D. Recovery %	
Benzene		< 0.0010	0.0846	0.0855	0.1000	0.0010	25.0	1.1	84.6	65-135
Toluene		< 0.0010	0.0860	0.0857	0.1000	0.0010	25.0	0.3	86.0	65-135
Ethylbenzene		< 0.0010	0.0871	0.0877	0.1000	0.0010	25.0	0.7	87.1	65-135
m,p-Xylenes		< 0.0020	0.1720	0.1730	0.2000	0.0020	25.0	0.6	86.0	65-135
o-Xylene		< 0.0010	0.0893	0.0898	0.1000	0.0010	25.0	0.6	89.3	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

SW- 846 5030/3020 BTEX
Date Validated: Nov 5, 1997 09:00

Analyst: HL

Date Analyzed: Nov 4, 1997 12:28

Matrix: Liquid

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

BLANK SPIKE ANALYSIS

Parameter	[A]	[B]	[C]	[D]	[E]	[F]	[G] Qualifier
	Blank	Blank Spike	Blank	Method	QC	LIMITS	
	Result	Result	Spike	Detection	Blank Spike	Recovery	
	ppm	ppm	Amount	Limit	Recovery	Range	
			ppm	ppm	%	%	
Benzene	< 0.0010	0.0984	0.1000	0.0010	98.4	65-135	
Toluene	< 0.0010	0.1000	0.1000	0.0010	100.0	65-135	
Ethylbenzene	< 0.0010	0.1020	0.1000	0.0010	102.0	65-135	
m,p-Xylenes	< 0.0020	0.2020	0.2000	0.0020	101.0	65-135	
o-Xylene	< 0.0010	0.1040	0.1000	0.0010	104.0	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



xenco contact : Carlos Castro/Edward Yonemoto

1 2 3

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST FORM

Contractor		K.E.I. Consultants		Phone (210) 680-3767		Contractor COC #	
Address		5309 Wurzbach, Suite 100 San Antonio, TX 78238		Carrier: WPS		Quote #:	
Project Name		TUMPL		Airbill No.		PO No: 8130	
Project Location		Monument		Project Director		Mike Hawthorn	
Sampler Signature		Stanley Shover		Project Manager		Theresa NIK	
Project No.		60057		Site #		13	
SAMPLE CHARACTERIZATION							
Field ID	Date	Time	DEPTH	SOIL	WATER	COMPA	GRA
mw-1	11-1-97	1345					
mw-2	11-1-97	1400					
mw-3	11-1-97	1415					
CONTAINERS							
No	of	CONTAINERS	Sample Description	Tank No.	Unl	Dies	Ker
1	2		HCl				Unknown
2	2		HCl				
3	2		HCl				
4							
5							
6							
7							
8							
9							
10							
Remarks							
Please fax Analytical to Theresa NIK Fax (830) 591-1476 Phone (210) 680-3767							

Pink (Contractor), Yellow & White (Lab)

* Pre-scheduling is recommended

59

Precision Analytical Services

ANALYTICAL REPORT 1-72736

for

K.E.I. Consultants, Inc.

Project Manager: Theresa Nix

Project Name: TNMPL-Site #13

Project Id: 610057

November 5, 1997



HOUSTON - DALLAS - SAN ANTONIO

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

November 5, 1997

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

Reference: **XENCO Report No.: 1-72736**
Project Name: TNMPL-Site #13
Project ID: 610057
Project Address: Monument, NM

Dear Theresa Nix:

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 1-72736. 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.

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

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

Form C-138
Originated 8/8/93

Submit Original
Plus 1 Copy
to appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator <u>TNM LLC</u>
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site <u>Cocoon #13</u>
2. Management Facility Destination <u>C & C Land Farm</u>	6. Transporter <u>Turner Trucking</u>
3. Address of Facility Operator <u>2 m. South of Monument NE 1/4 / NE 1/4</u>	8. State <u>New Mexico</u>
7. Location of Material (Street Address or ULSTR) <u>Sec 5, T20S, R37E</u>	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. ☒ B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Hydro Carbon Stained Soil Non HAZARDOUS / Knowledge
of Process Approval NMOC

Estimated Volume 4500 cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Armando T. Caceres TITLE: President DATE: 2-4-97
Waste Management Facility Authorized Agent
TYPE OR PRINT NAME: Armando T. Caceres TELEPHONE NO.: 397-2245

(This space for State Use)

APPROVED BY: Chris Williams TITLE: District Supervisor DATE: 12/8/97

APPROVED BY: _____ TITLE: _____ DATE: _____

C & C LANDFARM, INC.

BOX 55

MONUMENT, NEW MEXICO 88265

PHONE: (505) 397-2045

(505) 397-2860

(505) 392-2236

001978

COMPANY NAME

El Nuevo Mex. Republic

COMPANY REPRESENTATIVE NAME

James Levine

LEASE NAME

TNM 51214 - #13

SEC.

5

TOWNSHIP

19

RANGE

36

TRUCKING COMPANY NAME

Turner

DRIVERS SIGNATURE

(Signature) Donald

TYPE OF MATERIAL BEING HAULED AND QUANTITY

618 yds

dry dirt

COPY OF ANALYSIS ATTACHED, IF REQUIRED

non haz

TPHC

1149

BENZENE

TOLUENE

ETHYL BENZENE

PARA XYLENE

ATTENDANT ON DUTY

(Signature) Bob

DATE

12-31-91

JIM COOPER
C & C LANDFARM, INC.

BOX 55

MONUMENT, NEW MEXICO 88265

PHONE: (505) 397-2045

(505) 397-2860

(505) 392-2236

001520

COMPANY NAME

COMPANY REPRESENTATIVE NAME

LEASE NAME

SEC.

TOWNSHIP

RANGE

TRUCKING COMPANY NAME

DRIVERS SIGNATURE

TYPE OF MATERIAL BEING HAULED AND QUANTITY

COPY OF ANALYSIS ATTACHED, IF REQUIRED

TPHC

BENZENE

TOLUENE

ETHYL BENZENE

PARA XYLENE

ATTENDANT ON DUTY

DATE

QA/QC PROCEDURES

DECONTAMINATION OF EQUIPMENT

Cleaning of drilling equipment was the responsibility of the drilling company. Prior to collection of each soil sample, sampling equipment was cleaned with Liqui-Nox detergent and rinsed with distilled water.

SOIL SAMPLING

Samples of subsurface soils were obtained by hydraulically pushing a 2-inch stainless steel sampler or a five-foot continuous core sampler. 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 sealed and labeled for head-space analysis using a photoionization 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 samples collected were placed in a sterile glass container equipped with a Teflon-lined lid furnished by the analytical laboratory. The container was filled to capacity with soil to limit the amount of head-space present. Each container was labeled and placed on ice in an insulated cooler. The cooler was sealed for shipment to Xenco Laboratories in Houston, Texas or Environmental Lab of Texas, Inc. in Odessa, Texas. Proper chain-of-custody documentation was maintained throughout the sampling process.

GROUND WATER SAMPLING

Ground water samples were collected from the 3 monitoring wells. After measuring the depth to ground water, each well was purged of approximately 3 well volumes of water using a PVC bailer. The bailer was cleaned prior to each use with Liqui-Nox detergent and rinsed with distilled water.

After purging the wells, the water samples were collected with disposable Teflon samplers and polyethylene lines by personnel wearing clean, disposable gloves. Ground water sample containers were filled in the order of decreasing volatility (i.e., BTEX containers were filled first and PAH containers second).

Ground water samples collected for BTEX analyses were placed in sterile, 40 ml glass VOA vials equipped with Teflon-lined caps. Water samples collected for PAH analysis were placed in sterile one liter glass containers equipped with Teflon-lined caps. Water samples collected for metals analysis were placed in 500 ml containers equipped with Teflon-lined caps. The containers were provided by the analytical laboratory. The vials were filled to a positive meniscus, sealed, and visually checked for the presence of air bubbles. If air bubbles were present, the vials were uncapped, additional sample water was added, and the vials were resealed until no air bubbles were present.

The filled containers were labeled and placed on ice in an insulated cooler, and chilled to an approximate temperature of 40°F (4°C). The cooler was sealed for shipment to Xenco Laboratories in Houston, Texas. Proper chain-of-custody documentation was maintained throughout the sampling process. The laboratory was responsible for maintaining proper laboratory analytical QA/QC procedures. These procedures are either transmitted with the laboratory reports or are on file at the laboratory.

SOIL SAMPLES

Soil samples were transported to a certified laboratory for TPH and BTEX analyses using the methods described below. Soil samples were analyzed for TPH and BTEX within 14 days following the collection date.

The soil samples were analyzed for TPH concentrations in accordance with EPA Method 418.1 and for BTEX concentrations in accordance with EPA Method SW846-8020, 5030.

GROUND WATER SAMPLES

Ground water samples from the 3 events and the excavation bottom were submitted for determination of BTEX concentrations. Ground water samples collected during the first event were also submitted for determination of metals, PAH, major cations/anions, total dissolved solids (TDS), and total inorganic carbon (TIC). All PAH constituents were below laboratory detection limits.

The samples were analyzed for BTEX concentrations using EPA Method SW846-8020, 5030.

The water sample was analyzed for PAH in accordance with EPA Method 8100, metals in accordance with EPA Method 6010, for TDS in accordance with EPA Method 160.1, for TIC in accordance with Modified Method 415.1, for anions in accordance with EPA Method 300.0, and for carbonate/bicarbonate in accordance with SM4500CO2D.