426-281

20 - 13

REPORTS

1R -

DATE:

Rice Environmental Consulting & Safety

P.O. Box 5630 Hobbs, NM 88241 Phone 575.393.4411 Fax 575.393.0293

CERTIFIED MAIL

RETURN RECEIPT NO. 7008 1140 0001 3073 0667

March 20th, 2013

Mr. Edward Hansen

New Mexico Energy, Minerals, & Natural Resources Oil Conservation Division, Environmental Bureau 1220 S. St. Francis Drive Santa Fe, New Mexico 87505

RECEI

MAR 21 2013

Oil Conservation Division 1220 S. St. Francis Drive Santa Fe, NM 87505

RE: Initial CAP Report and Soil Closure Request Rice Operating Company – BD SWD System BD G-23 EOL (1R426-281): UL/G sec. 23 T22S R37E (formerly BD B-23 EOL)

Mr. Hansen:

RICE Operating Company (ROC) has retained Rice Environmental Consulting and Safety (RECS) to address potential environmental concerns at the above-referenced site in the BD Salt Water Disposal (SWD) system. The site was previously referred to as the BD B-23 EOL. However, GIS mapping shows the site to be located within unit letter G. To reflect the geographical location of the site, the name has been changed to the BD G-23 EOL. All correspondences will reference BD G-23 EOL.

ROC is the service provider (agent) for the BD SWD System and has no ownership of any portion of the pipeline, well, or facility. The system is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

Background and Previous Work

The site is located approximately 4 miles southeast of Eunice, New Mexico at UL/G sec. 23 T22S R37E as shown on the Site Location Map (Figure 1). Groundwater at this site is located at a depth of approximately 59 +/- feet.

In 2010, ROC initiated work on the former BD G-23 EOL junction box. The former junction box was located on an active battery pad and contained a boot. The site was delineated using a backhoe to form a 25 ft x 10 ft x 12 ft deep excavation and soil samples were screened at regular intervals for both hydrocarbons and chlorides. From the excavation, the four-wall composite, the bottom composite and the backfill were taken to a commercial laboratory for analysis. Laboratory tests of the four-wall composite showed a chloride reading of 3,320 mg/kg, and gasoline range organics (GRO) and diesel range organics (DRO) readings of non-detect. The bottom composite showed a chloride

laboratory reading of 9,520 mg/kg and GRO and DRO readings of non-detect. The soil was blended on site and a sample taken to a commercial laboratory for analysis. Laboratory analysis of the blended backfill showed a chloride reading of 4,560 mg/kg and GRO and DRO readings of non-detect. The blended backfill was returned to the excavation to 5 ft below ground surface (bgs). At 5-4 ft bgs, a 1 foot clay layer was installed and a clay compaction test was performed on March 1st, 2010. The remaining backfill was exported to a NMOCD approved facility for disposal and the excavation was backfilled with clean, imported soil to ground surface.

The area was contoured to the surrounding landscape, seeded, and an identification plate was placed on the surface of the site to mark its location for future environmental considerations. NMOCD was notified of potential groundwater impact on August 4th, 2010, and a junction box disclosure report was submitted to NMOCD with all the 2010 junction box closures and disclosures.

As part of the Investigation and Characterization Plan approved by NMOCD on May 19th, 2011, six soil bores (SB-1 through SB-6) were advanced through the former junction box site on May 23rd, 2011 and June 6th, 2011. RECS personnel field tested the soil for chlorides and screened in the field with a photo-ionization detector (PID). Representative samples from the bores were taken to a commercial laboratory for confirmation of chloride and hydrocarbon field numbers. All the soil bores had laboratory chloride values that decreased with depth. SB-1 had chloride results that decreased from 8,200 mg/kg at 15 ft bgs to 160 mg/kg at 55 ft bgs; SB-2 had values of 1,420 mg/kg at 20 ft bgs, 112 mg/kg at 30 ft bgs and 304 mg/kg at 40 ft bgs; SB-3 had values of 5,300 mg/kg at the surface, 1,760 mg/kg at 5 ft bgs and 336 mg/kg at 55 ft bgs; SB-4 has values of 12,800 mg/kg at 15 ft bgs and 4,000 mg/kg at 55 ft bgs; SB-5 had values of 10,200 mg/kg at 20 ft bgs and 544 mg/kg at 50 ft bgs; and SB-6 had values of 2,560 mg/kg at 15 ft bgs and 192 mg/kg at 30 ft bgs. GRO readings were non-detect in all soil bores. DRO readings were also non-detect at all depths in all soil bores except for SB-2 at 30 ft bgs where the DRO reading was 26.9 mg/kg. This sample was analyzed for BTEX and returned results of 0.113 mg/kg for benzene, 0.132 mg/kg for toluene, 0.119 mg/kg for ethyl-benzene and 0.499 mg/kg for xylene.

Based on the initial delineation results, RECS submitted an ICP Report with the following recommendation to NMOCD on July 15th, 2011 which was approved on September 20th, 2011: ROC would delineate groundwater quality surrounding the former junction box through the installation of a near source monitoring well.

On January 31st, 2012, RECS personnel were on site to install a near-source monitor well (MW-1). Samples were only taken for lithology as the well was being advanced. The well has been sampled quarterly since its installation (Figure 2). During the last sampling event on January 8th, 2013, MW-1 had 0.87 feet of product in the well so a sample could not be collected.

A Further Investigation Report and Corrective Action Plan for Soils was submitted to NMOCD on March 16th, 2012 and approved on March 20th, 2012. In the plan, ROC

proposed to excavate the site to dimensions of 29 ft x 36 ft and properly seat a 20-mil reinforced poly liner at approximately 4 ft bgs. The liner would cover the existing clay layer at approximately 5-4 ft bgs measuring 25 ft x 10 ft. The soils placed above the liner would have a laboratory chloride reading no greater than 500 mg/kg and a field PID measurement below 100 ppm. Excavated soils would be evaluated for use as backfill and any soils requiring disposal would be properly disposed of at a NMOCD approved facility. The excavation would be capped with caliche since the site is located on an active battery lease pad and seeding of the site would not be necessary.

CAP Report for Soils

RECS began the excavation for liner installation on January 16th, 2013. The site was excavated to 29 ft x 36 ft to a depth of 4.5 ft bgs, uncovering the existing clay layer (Figure 2). A 20-mil reinforced poly liner was installed and properly seated at the base of the excavation. Clean, imported blow sand was used to backfill the site to 3 ft bgs and the final 3 ft was backfilled with clean, imported caliche. This site is located on a lease pad and seeding was not required. A sample of the imported blow sand and imported caliche was field tested for hydrocarbons. The blow sand returned a result of 5.6 ppm and the caliche returned a result of 4.3 ppm. A sample of the imported blow sand and imported caliche was then taken to a commercial laboratory for analysis of chlorides and returned a result of 32 mg/kg for the blow sand and 112 mg/kg for the caliche. A total of 236 yards of contaminated soil was exported to a NMOCD approved facility. A total of 60 yards of blow sand and 156 yards of caliche was imported to the site to serve a backfill material. All documentation for these activities can be found in Appendix A.

Monitor Well Installation

On February 12th, 2013, RECS personnel were on site to install MW-2, an up-gradient monitor well (Figure 3). Samples were taken for analysis of background soil concentrations as the well was installed and field tested for chlorides and hydrocarbons. Representative samples were taken to a commercial laboratory for analysis. The 15 ft sample returned a chloride result of 1,580 mg/kg and the 50 ft sample returned a chloride result of non-detect. In both samples, GRO and DRO were non-detect (Appendix B).

RECS recommends that ROC sample the up-gradient well (MW-2) in conjunction with the near-source well (MW-1) to determine background groundwater concentrations. Soil data collected from SB-1 through SB-6 resulted in low concentrations of TPH, suggesting the product observed in MW-1 was contributed from a non-ROC up-gradient source. Once this data has been analyzed, ROC will either submit a Corrective Action Plan for Groundwater or a Termination Request.

ROC acknowledges they have met the soil requirements as approved by the NMOCD in the Corrective Action Plan (CAP), and the newly installed 20-mil reinforced liner will prohibit the migration of any residual chlorides. As such, ROC requests 'Soil Closure' for this site. RECS appreciates the opportunity to work with you on this project. Please call Hack Conder at (575) 393-9174 or me if you have any questions or wish to discuss the site.

Sincerely,

JC.W

Lara Weinheimer Project Scientist RECS (575) 441-0431

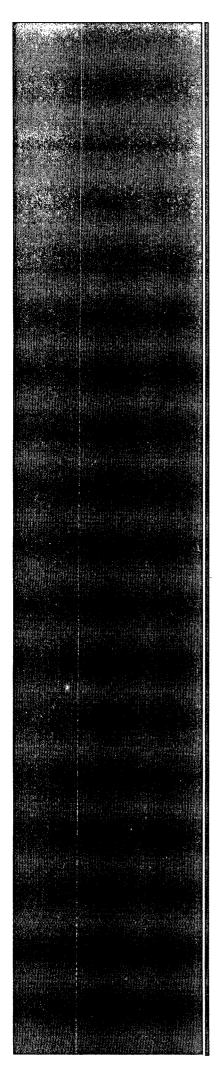
Attachments:

Figure 1 – Site Location Map Figure 2 – MW-1 Sampling Data and NMOCD Approved Liner Figure 3 – Soil Bore and MW installation Appendix A – Liner Installation Documentation Appendix B – MW-2 Installation Documentation

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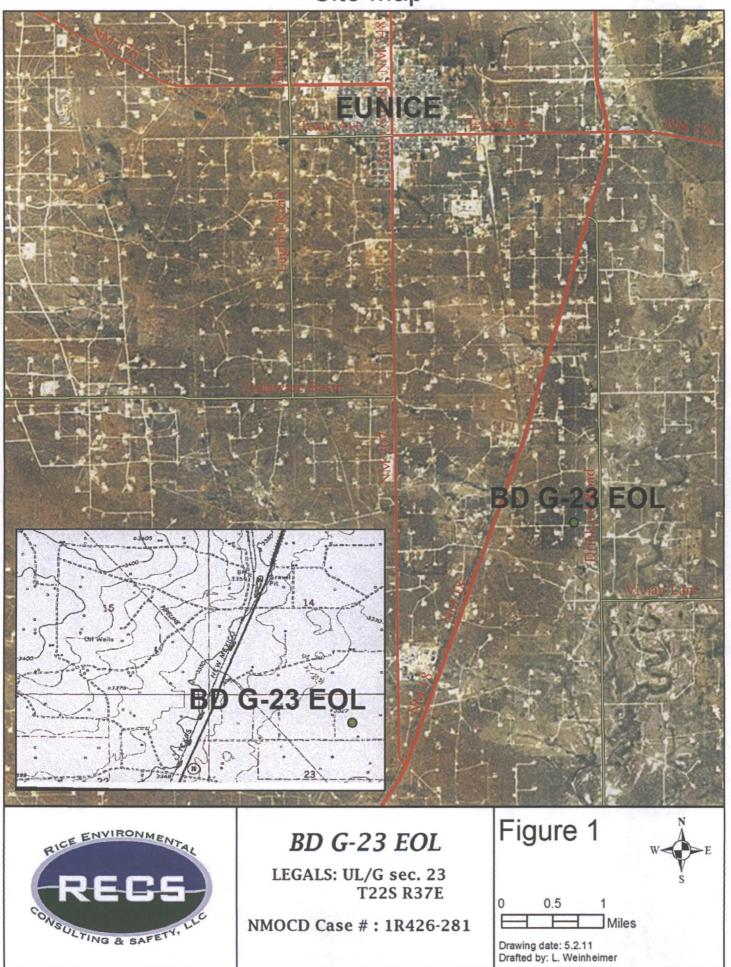
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Figures

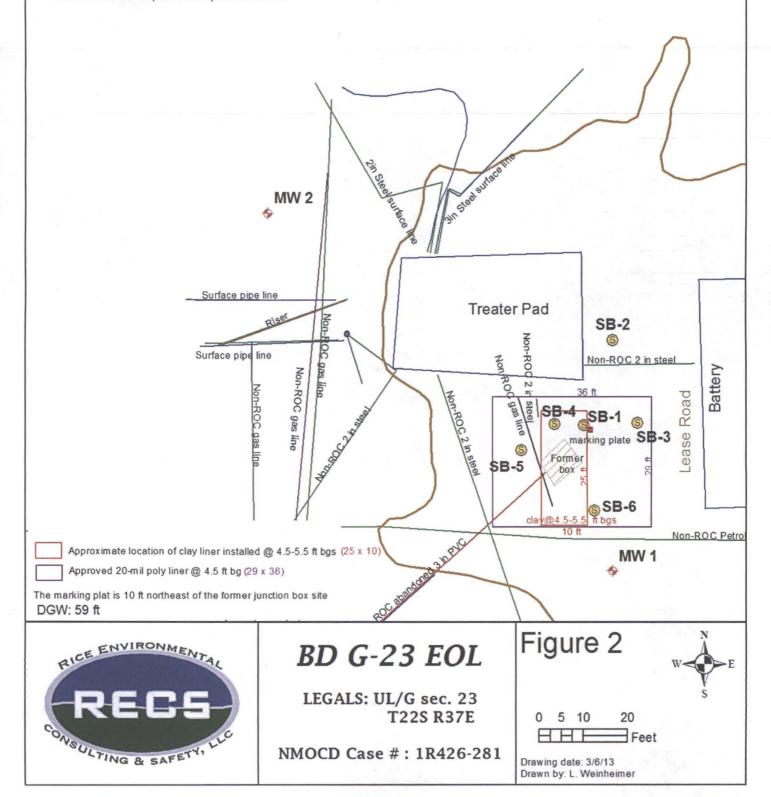
RICE Environmental Consulting and Safety (RECS) P.O. Box 5630 Hobbs, NM 88241 Phone 575.393.4411 Fax 575.393.0293 Site Map



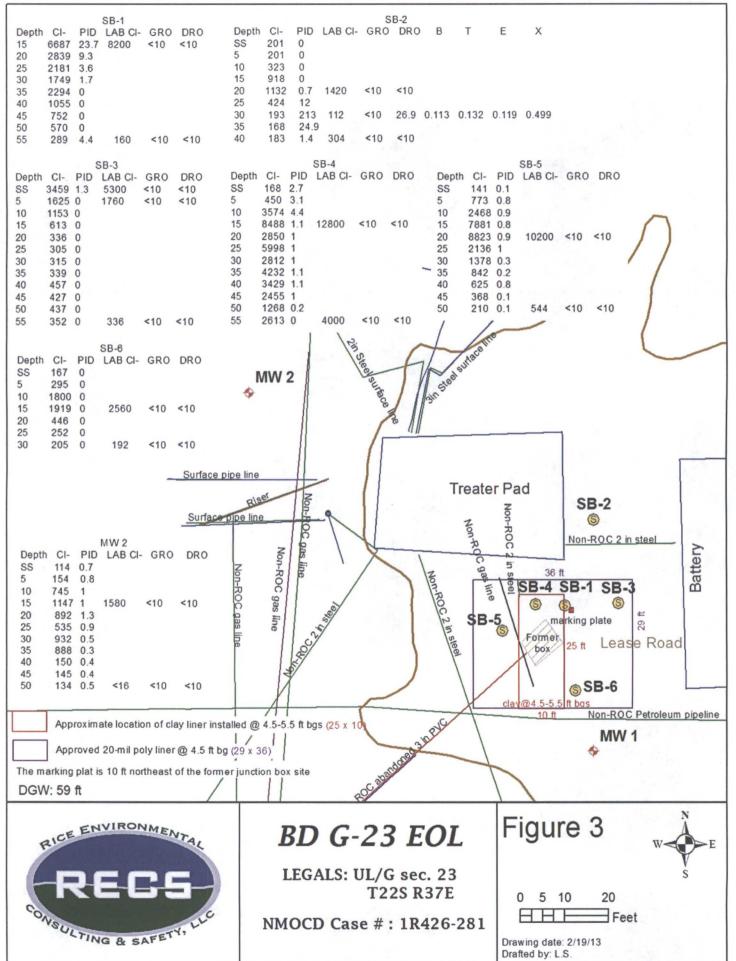
MW-1 Sampling Data and NMOCD Approved Liner

	Depth to	Total	Sample					Ethyl	Total	
MW	Water	Depth	Date	CI	TDS	Benzene	Toluene	Benzene	Xylenes	Sulfate
1	60.84	107.83	2/20/2012	860	1970	< 0.001	<0.001	<0.001	< 0.003	90.5
1	60.89	107.83	4/19/2012	1080	1980	< 0.001	<0.001	<0.001	<0.003	58.6
1	60.92	107.83	7/16/2012	1040	2280	< 0.001	<0.001	<0.001	< 0.003	47.8
1	61.02	107.83	10/5/2012	970	1880	< 0.001	<0.001	<0.001	< 0.003	46.2
1	60.92	107.83	1/8/2013	XXX	XXX	XXX	XXX	XXX	XXX	XXX

XXX: MW-1 not sampled due to product in well.



Soil bore and MW installation



Appendix A Liner Installation Documentation

RICE Environmental Consulting and Safety (RECS) P.O. Box 5630 Hobbs, NM 88241 Phone 575.393.4411 Fax 575.393.0293

RICE ENVIRONMENTAL CONSULTING & SAFETY

122 West Taylor Hobbs, NM 88240 PHONE: (505) 393-9174 FAX: (505) 397-1471 PID METER CALIBRATION & FIELD REPORT FORM



MODEL: PGM 7300 MODEL: PGM 7300 MODEL: PGM 7320 MODEL: PGM _____

SERIAL NO: 590-000508 SERIAL NO: 590-000504 SERIAL NO: 592-903318 SERIAL NO:

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO : HAL-245-100-1

EXPIRATION DATE: 7-15-2015 METER READING ACCURACY: 100 PPM

ACCURACY : +/- 2%

	CO	MPANY	:	
		RICE		
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SITE	UNIT	SECTION	TOWN SHIP	RANGE

SITE	UNIT	SECTION	TOWN SHIP	RANGE
BD G-23 EOL	G	23	T22S	R37E

SAMPLE ID	PID	SAMPLE ID	PID
IMPORTED BLOWSAND	5.6		
IMPORTED CALICHE	4.3		
			· · · ·
		· · · · · · · · · · · · · · · · · · ·	

I verify that I have calibrated the above instrument in accordance to the manufacture operation manual.

SIGNATURE:

let mores

DATE: 1-21-2013



January 22, 2013

Hack Conder Rice Operating Company 112 W. Taylor Hobbs, NM 88240

RE: BD G-23 EOL

Enclosed are the results of analyses for samples received by the laboratory on 01/18/13 15:20.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceg.texas.gov/field/ga/lab accredited certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keine

Celey D. Keene Lab Director/Quality Manager



Analytical Results For:

Rice Operating Company Hack Conder 112 W. Taylor Hobbs NM, 88240 Fax To: (575) 397-1471

Received:	01/18/2013	Sampling Date:	01/18/2013
Reported:	01/22/2013	Sampling Type:	Soil
Project Name:	BD G-23 EOL	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	T22S R37E SEC23 G ~ LEA COUNTY, NM		

Sample ID: IMPORTED BLOWSAND (H300149-01)

Chloride, SM4500CI-B	 mg,	/kg	Analyze	d By: AP					
Analyte	 Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	01/22/2013	ND	432	108	400	0.00	

Sample ID: IMPORTED CALICHE (H300149-02)

Chloride, SM4500CI-B	mg,	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	.01/22/2013	ND	432	108	400	0.00	

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whetsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidential or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successons arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such cliains based upon any of the above stated reasons or otherwise. Results relate only to the sample's learning out of performance of Cardinal Laborations.

Celuz D. Kune

Celey D. Keene, Lab Director/Quality Manager

Page 2 of 4



Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500CI-B does not require samples be received at or below 6° C
	Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Kune

Celey D. Keene, Lab Director/Quality Manager

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603

(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325)673-7020

Company Name	ride operating of	mpany						×			BI.	ll TO		ġ.				ANAL	_YSIS	S RE	QUE	ST			
Project Manager: Hack Conder							P	P.O. #:				Τ	Γ				·								
Address: 122	West Taylor							с	Company:								1	S				,			
City: Hobbs		State: NM	Zip	: 88	240			A	Attn:								o Lo								
Phone #: 575-3	393-9174	Fax #: 575-39	97-1	471	<u></u>			Address:					_				4 L						-		
Project #: Project Owner:								c	ity:					4 0	≥		T	s/I							
Project Name:							s	tate	:		Zip:		l ä	15	×		6								
Project Location	N. BD G-23 Robert E	FOL						P	hon	e #:	<u></u>			- Ē	8015	BTEX	လ	ati							
Sampler Name:	KODENT E	Gav19		(****)	-	MAT	12:000	F	ax #			SAMPLI		Chlorides	II	m	Texas TPH	O O							
FOR LAB USE ONLY	Sample		(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	DIEVVAIEK		SLUDGE. OTHFR ·	ŭ				TIME		HdT		Te	Complete Cations/Anions			-				
1	IM Ported IM Ported	Blow Sand	6	1		2-						1-18-13	4:00	1	1										
<u> </u>	TA Ported	Caliche	6	1		V			_			1-15-13	4:55	v	1										
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† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

#26

NEED SAMPLES BACK, PLEASE

BD G-23 EOL UL/G, Section 23, T22S, R37E



Site prior to excavation, facing northwest

9/18/2012



Installing liner @ 5' bgs, facing southwest

1/18/2013



Excavating site, facing west

1/16/2013



Importing blow sand, facing northwest

1/18/2013

BD G-23 EOL UL/G, Section 23, T22S, R37E



Installed a 3' pad of blow sand, facing southwest

1/18/2013



Backfilling site, facing southwest

1/18/2013



Importing caliche for backfill, facing southwest

1/18/2013



Site complete, facing northwest

1/18/2013

Appendix B MW-2 Installation Documentation

RICE Environmental Consulting and Safety (RECS) P.O. Box 5630 Hobbs, NM 88241 Phone 575.393.4411 Fax 575.393.0293

Logger: Driller: Drilling N		Kyle Norm ison & Coo Air Rota	per, Inc.	MWV 2 Treater Pad see Treater Pad see to SB-2 MROCIPUE		Const.	SE	B SAVETVI LLC	
		All hold	y .	SB-5 SB-5 SB-5 SB-5 SB-5 SB-5 SB-5 SB-5	Pro	oject Name:		W	/ell ID:
Start Dat	e:	2/12/201	3	\$8.4		BD G-23	EOI	L	MW-2
End Date		2/12/201	-	vr (g) + 5 8 logs (25 + 10)	Pro	oject Consu	Itan	t: RECS	
Comme				northwest of the former junction es were from cuttings.	Lo	cation: UL/C	a se	c. 23 T22	S R37E
				inheimer		: 32°22'52.0			County:Lea
Dauth	TD = 7	1 ft		GW = 59 ft	Lo	ng: 103°7'48	8.23	37"W	State:NM
Depth (feet)	Chloride field tests	LAB	PID	Description		Lithology		Well Co	onstruction
<u> </u>								274]
				Brown Sand					
SS	114		0.7		12				
					1				
5 ft	154		0.8						-
511	154	-	0.0						1
10.0									
10 ft	745		1.0	Tan Sand With Some Caliche					
									and the second
		CI-							
15 ft	1147	1580	1.0						
		GRO <10							
		DRO <10						2 in	
20 ft	800	<10	10					in PVC	
20 11	892	-	1.3						
									- bentonite
									seal
25 ft	535		0.9						
				Red/Tan Sand With Some Caliche					
30 ft	932		0.5						
		1							
	888		0.3		14				

Depth (feet)	Chloride field tests	LAB	PID	Description	Lithology	Well Construction
40 ft	150		0.4	Red/Tan Sand With Some Caliche		
4011	130		0.4			
45 ft	145		0.4	Tan Sand		
50 ft	134	CI- <16 GRO	0.5			
		<10 DRO <10				
55 ft						sand
60 ft				NO SAMPLES TAKEN		pack
65 ft						
71 ft						

CARDINAL Laboratories

February 15, 2013

Hack Conder Rice Operating Company 112 W. Taylor Hobbs, NM 88240

RE: BD G-23 EOL

Enclosed are the results of analyses for samples received by the laboratory on 02/12/13 15:30.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab accredited certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keine

Celey D. Keene Lab Director/Quality Manager



Analytical Results For:

Rice Operating Company Hack Conder 112 W. Taylor Hobbs NM, 88240 Fax To: (575) 397-1471

Received:	02/12/2013	Sampling Date:	02/12/2013
Reported:	02/15/2013	Sampling Type:	Soil
Project Name:	BD G-23 EOL	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	T22S R37E SEC23 G ~ LEA COUNTY, NM		

Sample ID: MW-2 @ 15' (H300395-01)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: DW					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride 1580 16.0		02/14/2013	ND	416	104	400	3.77		
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result Reporting Limit		Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	02/14/2013	ND	210	105	200	2.24	
DRO >C10-C28	<10.0	10.0	02/14/2013	ND	194	96.8	200	5.26	
Surrogate: 1-Chlorooctane	79.8	% 65.2-14	0			• • • • • • • • • • • • • • • •			
Surrogate: 1-Chlorooctadecane	89.5	% 63.6-15	4						

Sample ID: MW-2 @ 50' (H300395-02)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: DW					<u>.</u>
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	02/14/2013	ND	416	104	400	3.77	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	02/14/2013	ND	210	105	200	2.24	
DRO >C10-C28	<10.0	10.0	02/14/2013	ND	194	96.8	200	5.26	
Surrogate: 1-Chlorooctane	77.3	% 65.2-14	0						
Surrogate: 1-Chlorooctadecane	89.2	% 63.6-15	4						

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This reproduced except in full with written approval of Cardinal Laboratories.

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500CI-B does not require samples be received at or below 6°C
	Samples reported on an as received basis (wet) unless otherwise noted on report

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Celuz D. Kune

Celey D. Keene, Lab Director/Quality Manager

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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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