GW-211

Supplemental Site Investigation Work Plan Date: 1/12/2012

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PROPOSED SUPPLEMENTAL SITE INVESTIGATION WORK PLAN

LARGO COMPRESSOR STATION GROUNDWATER DISCHARGE PLAN GW-211

Compressor Station and Retention Pond Areas SE ¼ of NE ¼, Section 15, Township 26N, Range 7W Rio Ariba County, New Mexico

> January 12, 2012 SWG Project No. 0410002

> > Prepared for:

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1.0 INTRODUCTION

1.1 SITE LOCATION AND HISTORY

The Largo Compressor Station is located off of County Road (CR) 379 in the SE ¼ of the NE ¼ in Section 15, Township 26N, Range 7W in Rio Arriba County, New Mexico, referred to hereinafter as the "Site" or "subject Site". The Site is a natural gas compressor station utilized to dehydrate and compress natural gas collected from production wells in the area for transportation via pipeline. The Site was constructed in the mid-1960s and currently includes two (2) compressor engines, a dehydration unit and related treater, one (1) bullet storage tank, an old condensate storage tank battery (with two (2 below-grade drain tanks), a new condensate storage tank battery, and inlet scrubbers and an office/shop building.

The Site is subject to regulatory oversight by the New Mexico Energy, Minerals, and Natural Resources Department (EMNRD), Oil Conservation Division (OCD). To address activities related to crude oil/condensate related releases, the New Mexico EMNRD OCD utilizes the *Guidelines for Remediation of Leaks, Spills and Releases* as guidance, in addition to the EMNRD/OCD rules, specifically NMAC 19.15.30 Remediation. These guidance documents establish investigation and abatement action requirements for sites subject to reporting and/or corrective action.

The Site location is depicted on Figure 1 of Appendix A which was reproduced from a portion of the United States Geological Survey (USGS) 7.5-minute series topographic map (Smouse Mesa). A Site Vicinity Map of the subject Site and adjoining properties is included as Figure 2 of Appendix A.

The areas of known or suspected impact at the Site have been previously identified as Areas 1 through 4 in OCD correspondence. Each of the areas is depicted on Figure 3 in relation to pertinent Site features and general Site boundaries.

The investigations of Areas 1 (Out-of-Service Condensate Tanks) and 2 (Valve Box Area) are complete. The areas addressed by this Supplemental Site Investigation Work Plan are described below:

Area 3 (Retention Pond Area)

Area 3 encompasses the northeast portion of the Site including the recently constructed storm-water retention pond. Historical petroleum hydrocarbon affected soil and groundwater were identified during the construction of the retention pond in July of



2009, which apparently originated from historic oil and contact water treatment and storage in the area of the current retention pond. An overview of the investigation and corrective actions completed in association with Area 3 prior to the initiation of SWG's investigation activities is presented in the following paragraphs.

An Enterprise subcontractor performed the initial excavation and off-site disposal of 1,700 cubic yards of petroleum hydrocarbon affected soils. In addition, subsequent to the completion of excavation activities, approximately 2,000 barrels of potentially impacted groundwater were recovered from the excavation for off-site disposal. The excavation reached an average approximate depth of 13 feet below grade surface (bgs). Groundwater was encountered at approximately 13 feet bgs. Confirmation samples collected by Souder Miller and Associates (SMA) did not fully define the extent of petroleum hydrocarbon impacted soil and groundwater in the area. The excavation was backfilled with unaffected material, leaving a four (4) to five (5) foot depression to utilize as the storm-water retention pond.

Laboratory analytical results for soil samples collected by SMA from Area 3, for soils believed to remain in place (*Retention Pond Excavation* (RPE), *Below Water Table* (BWT), and *Northeast Wall* (NE Wall)), and the groundwater samples collected from the excavation (*Groundwater from Excavation* (GE) and *Southwest Corner Retention Pond* (SWCRP)) are summarized in the tables included in Appendix B.

During November 2010, as part of a facility-wide investigation, SWG advanced eight (8) soil borings in the area defined as "Area 3 - Retention Pond Area". Each of these soil borings was completed as a permanent monitoring well and subsequently sampled as part of the Site monitoring well network.

Area 4 (Compression & Dehydration Area)

Area 4 includes the current and former compressor locations, the office/shop, the bullet tank and the dehydrator/scrubbers. During November 2010, as part of a facility-wide investigation, SWG advanced seven (7) soil borings in the area defined as "Area 4 - Compression & Dehydration Area". Four of these soil borings were completed as permanent monitoring wells and subsequently sampled as part of the Site monitoring wells network. Three (3) of the borings were completed as temporary sampling wells, to allow a single groundwater sampling event at those locations.

1.2 CHRONOLOGY OF EVENTS

Significant events and related activities associated with the Site, including the results of Site investigation activities and corrective action completed to date, are provided in the following summary:

September/October 2008	<u>Areas 1 through 4:</u> The OCD approves the planned storage tank modification from Enterprise with the condition that Enterprise files an appropriate closure plan for the old tank battery.
July/August 2009	<u>Area 3:</u> Historical petroleum hydrocarbon impact is discovered during the construction of a storm-water retention pond at the facility. SMA was retained to sample the excavation. Initial Form C-141 was submitted to OCD on July 6, 2009.

On July 15, 2009, a cement tank containing water (apparently an old cistern) was unearthed in the vicinity of the planned storm-water retention pond. SMA collected a water sample from the tank, and subsequent BTEX analyses indicate the tank water did not exhibit BTEX concentration in excess of the WQCC *Groundwater Quality Standards (GQSs)*. Soil confirmation samples were collected below the water table (BWT) on the north side of the retention pond excavation and on the northeast wall (NE Wall) of the retention pond excavation. Analytical results indicate the soil confirmation samples BWT and NE Wall contain TPH GRO/DRO, benzene, and/or total BTEX concentrations in excess of the OCD *Remediation Action Levels*. Groundwater which was present at the BWT soil sample location was collected (GE) and submitted for analysis of BTEX. Based on the laboratory analytical results, the GE groundwater sample exhibited benzene, toluene and xylene concentrations in excess of the WQCC *GQSs*.

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On July 16, 2009, SMA evaluated a total of four (4) test pits, each with a total depth of approximately 13 feet bgs, to the north and east of the retention pond excavation. Groundwater was encountered in each of the test pits at approximately 13 feet bgs. SMA collected one (1) soil sample just above the water table in each of the test pits to field screen for the presence of volatile organic compounds (VOCs). Based on visual observations within the test pits and the field screening results of the collected soils samples. It was concluded that "soil impacts likely extended beyond a reasonable area for excavation" within Area 3. The decision was made to stop extending the excavation and to remove any visibly contaminated soil remaining in the existing excavation of Area 3. SMA subsequently collected a groundwater sample from the southwest corner of the retention pond excavation (SWCRP) and submitted it for analysis of BTEX. Based on the laboratory analytical results, the SWCRP groundwater sample exhibited benzene and xylene concentrations above the WQCC GQSs.

The excavated soils, approximately 1,701 cubic yards in total (one source indicates 3,000 cubic yards), were transported off-site and disposed of at the Evirotech land farm near Angel Peak, New Mexico. In addition, a vacuum truck was utilized to remove approximately 1,120 barrels of hydrocarbon impacted groundwater from the excavation prior to backfill. The excavation was backfilled with approximately 1,360 cubic yards of unaffected material, leaving a four (4) to five (5) foot depression to utilize as the storm-water retention pond.

A final C-141 was submitted to the OCD, indicating additional the need for additional studies.

<u>Areas 1 through 4:</u> Proposed Facility-Wide Soil and Groundwater Investigation (LTE – June 8, 2010): Enterprise submits a work plan to provide a Site-wide assessment of the Largo Compressor Station.

<u>Areas 1 through 4:</u> The OCD approves the proposed work plan submitted on June 10, 2010 with conditions.

November 2010

May 2010

June 2010

<u>Areas 1 through 4:</u> During November 2010, SWG advanced seventeen (17) soil borings across the facility as part of the facility-wide Site investigation. Four (4) of these soil borings were completed as temporary sampling wells to allow the collection of a single groundwater sample prior to plugging and



abandonment. The remaining thirteen (13) soil borings were completed as permanent monitoring wells.

March 2011

<u>Areas 1 through 4:</u> Environmental Site Investigation (SWG – March 24, 2011): Enterprise submits a report to the OCD documenting the facility-wide investigation findings and subsequent groundwater monitoring results. Analytical results from the investigation confirm the presence of hydrocarbon affected soil and groundwater in the vicinity of the retention pond (Area 3). Additionally, benzene is identified at concentrations above the WQCC GQSs in groundwater from monitoring well MW-39, in the vicinity of the current compressors (Area 4).

The groundwater sample collected from monitoring well MW-42, which is located on the hydrogeologically up-gradient boundary of the Site, exhibited a total dissolved solids (TDS) concentration of 75,400 mg/L. Based on the absence of beneficial use of the initial groundwater-bearing unit in the Site vicinity and the identified TDS concentration, the initial groundwater-bearing unit would not be considered an "Underground Source of Drinking Water" in accordance with 19.15.30 NMAC *Remediation*.

1.3 CHEMICALS OF CONCERN

The soil samples and groundwater samples collected from the soil borings and temporary sampling/monitoring wells during previous site investigation activities were analyzed for TPH GRO/DRO utilizing EPA method SW-846 #8015M and BTEX using EPA SW-846 method #8021B. The following information is a summary of investigative and recent quarterly groundwater sampling results for locations sampled in Areas 3 and 4.

Due to the presence of non-aqueous phase liquid (NAPL) hydrocarbon in association with the initial groundwater-bearing unit, monitoring wells MW-33, MW-35, and MW-37 were not sampled during quarterly groundwater monitoring events.

Total Petroleum Hydrocarbons

Soil samples collected from soil borings MW-33, MW-35, and MW-37 and soil samples from the sidewalls of the retention pond excavation (RPES, BWT, NE Wall) exhibited TPH GRO/DRO concentrations ranging from 170 mg/Kg to 7,740 mg/Kg, which exceed the OCD's *Remediation Action Level* of 100 mg/Kg.

During the December 2011 sampling event, TPH GRO/DRO was identified in the groundwater sample collected from monitoring well MW-39 at a concentration of <1.44 mg/L.

Benzene

The soil samples collected from soil boring MW-35 and the sidewall of the retention pond excavation (BWT) exhibited benzene concentrations of 11 mg/Kg and 14 mg/Kg, respectively, which exceed the OCD's *Remediation Action Level* of 10 mg/Kg.



The groundwater sample collected from monitoring well MW-39 exhibited a benzene concentration of 260 μ g/L which exceeds the WQCC *Groundwater Quality Standard* of 10 μ g/L.

Total BTEX

The soil samples collected from soil borings MW-33, MW-35, MW-37, and soil samples from the sidewalls of the retention pond excavation (BWT and NE Wall) exhibited total BTEX concentrations ranging from 112.5 mg/Kg to 729 mg/Kg, which exceed the OCD's *Remediation Action Level* of 50 mg/Kg.

Figure 3 indicates the approximate locations of the borings/temporary sampling wells/monitoring wells completed at the Site in relation to pertinent Site features and general Site boundaries. Figures 4 and 5 detail the OCD *Remediation Action Level* Exceedance Zone in soil and NMWQCC *Groundwater Quality Standard* Exceedance Zone in groundwater, respectively. Comprehensive soil and groundwater analytical results for the Site are included in Tables 1 and 2, respectively.

1.4 SITE RANKING & PROPOSED CLEANUP GOALS

The Site is subject to regulatory oversight by the New Mexico Energy, Minerals, and Natural Resources Department (EMNRD), Oil Conservation Division (OCD). To address activities related to condensate releases, the New Mexico EMNRD OCD utilizes the *Guidelines for Remediation of Leaks, Spills and Releases* as guidance, in addition to the OCD rules, specifically NMAC 19.15.30 *Remediation*. These guidance documents establish investigation and abatement action requirements for sites subject to reporting and/or corrective action.

In accordance with the OCD's *Guidelines for Remediation of Leaks, Spills and Releases,* SWG utilized the general site characteristics to determine the appropriate "ranking" for the Site. The ranking criteria and associated scoring are provided in the following table:

Rankin	g Criteria		Ranking Score		
	<50 feet	20			
Depth to Groundwater	50 to 99 feet	10	20		
	>100 feet 0				
Vellhead Protection Area •	Yes	20			
source, or; <200 teet from private domestic water source.	No	0	0		
	<200 feet	20			
Vellhead Protection Area • 1,000 feet from a water burce, or; <200 feet from rivate domestic water burce. Istance to Surface Water ody	200 to 1,000 feet	10	10		
Body	>1,000 feet	0			
Total Rar	nking Score		30		

Based on SWG's evaluation of the scoring criteria, the Site would have a Total Ranking Score of 30. This ranking is based on the following:



- The depth to the initial groundwater-bearing zone is <50 feet at the Site.
- Nearby drinking water sources were not identified within 1,000 feet of the Site.
- Largo wash, which is approximate 800 feet north of Areas 3 and 4, is the nearest surface water feature.

Based on a Total Ranking Score of 30, cleanup goals for soil located at the Site include: 10 mg/Kg for benzene, 50 mg/Kg for total BTEX and 100 mg/Kg for TPH GRO/DRO.

In addition, cleanup goals for groundwater located at the Site include the NMWQCC *Water Quality Standards* of: 10 µg/L for benzene, 750 µg/L for toluene, 750 µg/L for ethylbenzene, and 620 µg/L for total xylenes.

2.0 SUPPLEMENTAL SITE INVESTIGATION

The primary objective of the proposed supplemental site investigation activities is to further evaluate the magnitude and extent of COCs in groundwater at the Site in Areas 3 and 4.

2.1 SOIL BORING AND MONITORING WELL INSTALLATION

Up to ten (10) soil borings will be advanced on-site utilizing a direct push Geoprobe[®] drilling rig. The soil borings will be advanced at select locations to delineate the COC groundwater plume north of monitoring well MW-37 (Area 3), and in the vicinity of monitoring well MW-39 (Area 4). Additionally, monitoring well MW-40 will be replaced with a deeper monitoring well. The soil borings will be advanced to a maximum depth of approximately 25 feet below grade surface (bgs), five feet below the initial water table, or auger refusal, whichever is more shallow.

Non-disposable sampling and drilling equipment will be decontaminated using an Alconox[®] wash and potable water rinse prior to commencement of the project and between the advancement of each soil boring.

Soil samples will be collected continuously using core barrels or split spoon samplers to document lithology, color, relative moisture content and visual or olfactory evidence of impairment. In addition, the samples will be scanned with a photoionization detector (PID) for the presence of volatile organic compounds (VOCs).

Subsequent to the completion of the soil borings, each soil boring will be converted to a groundwater monitoring well to further evaluate the initial groundwater-bearing unit on the Site. The monitoring wells will be completed as follows:

- Installation of 10 to 15 feet of 2-inch diameter, machine slotted schedule 40 PVC well screen assembly with a threaded bottom plug;
- Installation of schedule 40 riser pipe to surface;
- Addition of graded silica sand for annular sand pack around the well screen from the



bottom of the well to two feet above the top of the screen;

- Placement of two feet of hydrated bentonite pellets above the sand;
- Addition of cement/bentonite slurry to the surface; and
- Installation of an above-grade steel riser with an integrated padlock hasp.

The monitoring wells will be developed by surging and removing groundwater until the fluid appears free of fine-grained sediment.

Following the installation of the monitoring wells, a survey will be conducted to determine the relative top of casing elevations of each monitoring well in order to evaluate the groundwater flow direction, and the relative ground elevation will be surveyed at each well to further evaluate the subsurface lithology on-site and to prepare lithologic and hydrogeologic cross sections, if necessary. Following well development and stabilization, the fluid levels in each of the monitoring wells will be gauged utilizing an interface probe capable of detecting NAPL.

The relative groundwater elevations on the Site will be utilized to construct a groundwater flow direction map. The groundwater flow direction map will depict the groundwater elevations at each monitoring well, the date of data collection, the calculated direction of groundwater flow and any limiting conditions regarding the evaluation of groundwater flow at the site (e.g. well stabilization, outlier data, etc.).

2.2 SAMPLING PROGRAM

SWG's soil and groundwater sampling program will consist of the following:

- 1. Collection of one (1) soil sample from each proposed soil boring; and,
- 2. Collection of one (1) groundwater sample from each monitoring well during Site quarterly groundwater monitoring activities utilizing a peristaltic pump.

Prior to sample collection, each monitoring well will be micro-purged utilizing low-flow sampling techniques. Low-flow refers to the velocity with which groundwater enters the peristaltic pump intake and that is imparted to the formation pore water in the immediate vicinity of the well screen. It does not necessarily refer to the flow rate of water discharged at the surface which can be affected by flow regulators or restrictions. Water level drawdown provides the best indication of the stress imparted by a given flow-rate for a given hydrological situation. The objective is to pump in a manner that minimizes stress (drawdown) to the system to the extent practical taking into account established site sampling objectives. Flow rates on the order of 0.1 to 0.5 L/min will be maintained during the sampling activities using dedicated sampling equipment.

The utilization of low-flow minimal drawdown techniques enables the isolation of the screened interval groundwater from the overlying stagnant casing water. The pump intake is placed within the screened interval such that the groundwater pumped is drawn in directly from the formation with little mixing of casing water or disturbance to the sampling zone.



The soil and groundwater samples will be collected in laboratory prepared glassware and placed on ice in a cooler, which will be secured with a custody seal. The samples will be transported to a selected analytical laboratory along with a completed chain-ofcustody form.

2.3 LABORATORY ANALYTICAL PROGRAM

The groundwater samples collected from the monitoring wells will be analyzed for TPH GRO/DRO utilizing EPA SW-846 Method 8015B and BTEX utilizing EPA SW-846 Method 8021B.

A summary of the analysis, sample type, and EPA-approved methods are presented below:

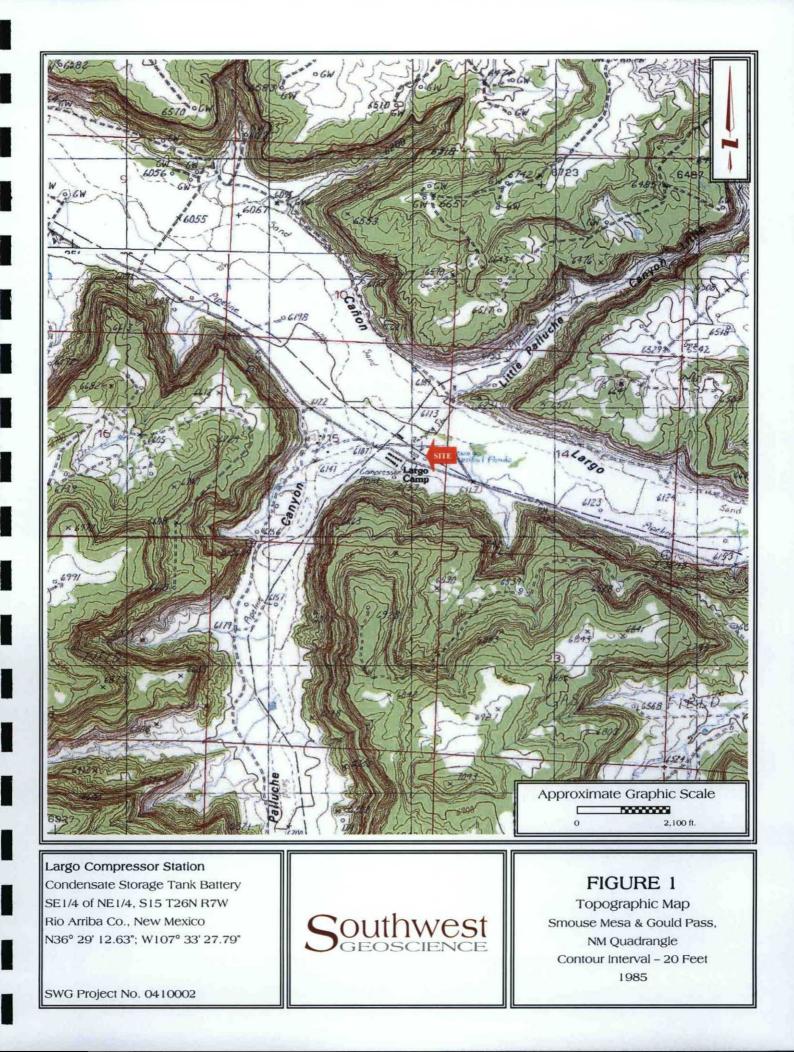
2.4 SUPPLEMENTAL SITE INVESTIGATION REPORT

Upon completion of supplemental site investigation and subsequent groundwater monitoring activities, a Supplemental Site Investigation Report will be prepared that will include documentation of investigative actions, groundwater monitoring results, and recommendations concerning further action, if necessary.

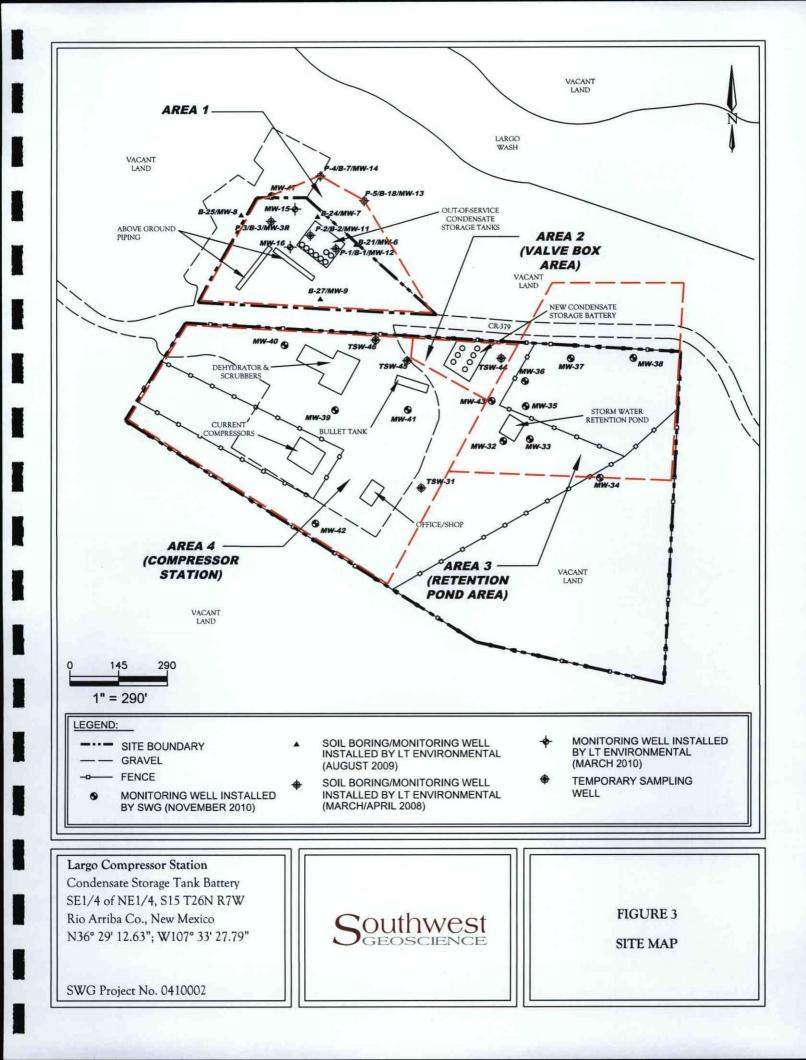
3.0 SCHEDULE

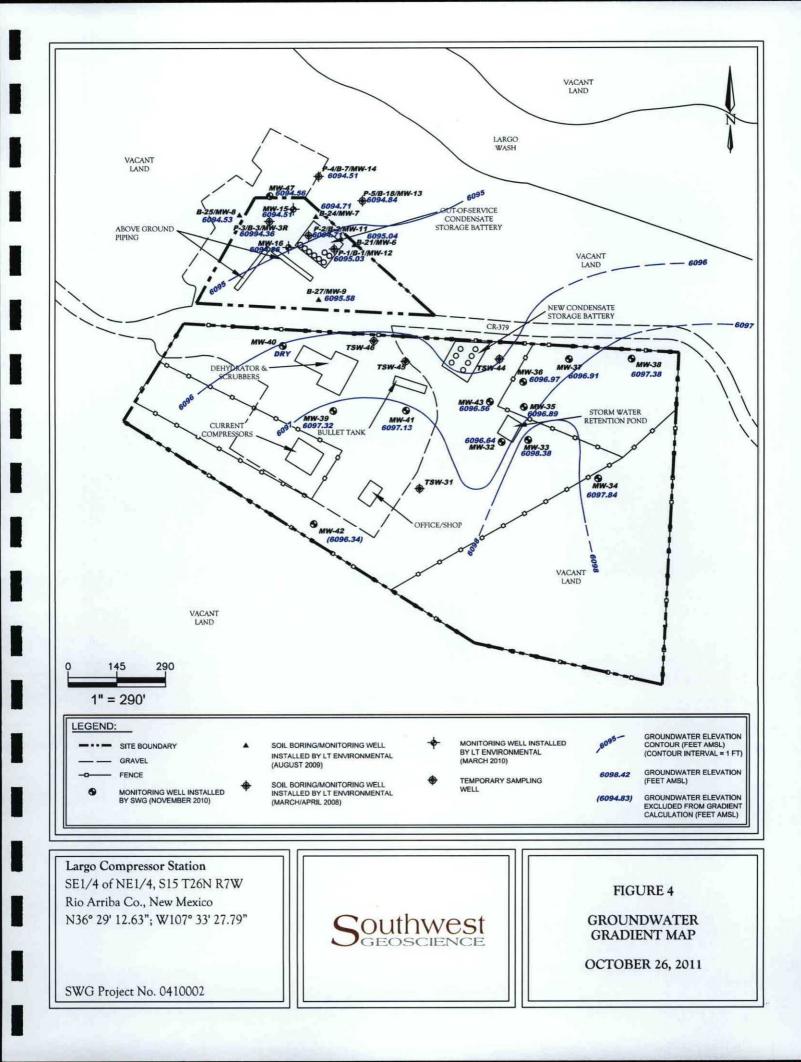
The completion of the proposed supplemental site investigation activities will require an estimated two (2) weeks; however, time estimations regarding the completion of investigation activities depend upon several factors, many of which cannot be predetermined. Variables which may impact the estimated time required to complete supplemental site investigation activities include, inclement weather, and laboratory analytical turn-around time.

The Supplemental Site Investigation will be performed during the first or second quarter of 2012. A Supplemental Site Investigation Report will be submitted to the OCD in subsequent to the completion of investigation activities and a minimum of one (1) quarterly groundwater monitoring event at the Site.









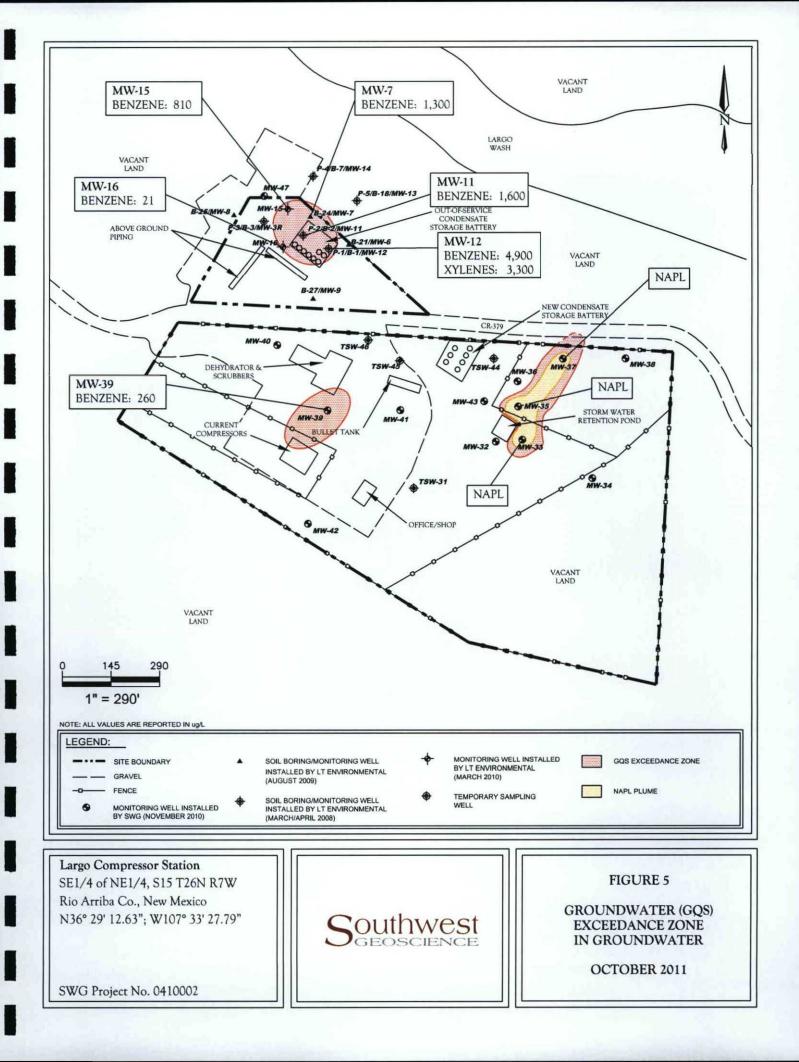


TABLE 1 Largo Compressor Station SOIL ANALYTICAL SUMMARY										
Sample I.D.	Date	Sample Depth (feet)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	Total BTEX (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)	
	y, Mineral & Nation Dil Conservation	Division,	10	NE	NE	NE	50	10		
			So	I Boring Advan	ced by Lodestar/LT					
B-1	3.31.08	4.0	<0.5	<0.5	1.5	44	<46.5	550	240	
B-1	3.31.08	14.5	1.8	<0.05	0.12	0.25	<2.22	6.7	<10	
B-2	3.31.08	12.5	<0.5	1.4	0.82	13	<15.72	240	45	
B-2	3.31.08	21.0	1.5	<0.05	<0.05	0.23	<1.83	7.5	<10	
B-3	3.31.08	21.0	<0.05	< 0.05	<0.05	<0.1	<0.16	<5.0	<10	
B-4	3.31.08	23.0	0.64	<0.05	0.19	0.12	<1	<5.0	<10	
B-5	4.01.08	17.5	1.2	<0.1	1.7	17	<20	400	60 <10	
B-6	4.01.08	18.0	<0.05	<0.05	<0.05	<0.1	<0.25	<5.0 <5.0	<10	
B-7 B-8	4.01.08	18.0 18.0	<0.05	<0.05 <0.05	<0.05	<0.1	<0.25	<5.0	<10	
B-8 B-9	4.01.08	21.0	<0.05	<0.05	<0.05	<0.1	<0.25	<5.0	<10	
B-10		10.0	<0.05	<0.05	<0.05	<0.1	<0.25	<5.0	<10	
B-10 B-10	4.01.08	20.0	0.06	<0.05	0.16	2.3	<2.57	55	<10	
B-11	4.01.08	20.0	<0.05	<0.05	<0.05	<0.1	<0.25	<5.0	<10	
B-12	4.02.08	18.5	<0.05	<0.05	<0.05	<0.1	<0.25	<5.0	<10	
B-12	4.02.08	20.0	<0.05	<0.05	<0.05	<0.1	<0.25	<5.0	<10	
B-13	4.02.08	10.0	< 0.05	<0.05	< 0.05	<0.1	<0.25	<5.0	<10	
B-13	4.02.08	12.5	<0.05	<0.05	<0.05	<0.1	<0.25	<5.0	<10	
B-13	4.02.08	20.0	0.092	<0.05	<0.05	<0.1	<0.292	9.8	<10	
B-14	4.02.08	5.0	<0.05	<0.05	< 0.05	<0.1	<0.25	<5.0	<10	
B-14	4.02.08	17.5	6.2	5.5	1.8	18	31.5	870	<10	
B-14	4.02.08	22.0	< 0.05	< 0.05	<0.05	<0.1	<0.25	<5.0	<10	
B-15	4.02.08	17.5	<0.05	<0.05 <0.05	<0.05	<0.1	<0.25 <0.25	<5.0 <5.0	<10	
B-15 B-16	4.02.08	20.0	<0.05	<0.05	<0.05	<0.1	<0.25	<5.0	<10	
B-10 B-17	4.02.08	17.5	0.47	<0.05	<0.05	<0.1	<0.67	<5.0	<10	
B-17	4.02.08	20.0	0.069	<0.05	<0.05	<0.1	<0.269	<5.0	<10	
B-18	4.02.08	20.0	< 0.05	<0.05	<0.05	<0.1	<0.25	<5.0	<10	
B-19	4.02.08	20.0	<0.05	<0.05	<0.05	<0.1	<0.25	<5.0	<10	
B-21	8.04.09	20.0	< 0.05	< 0.05	< 0.05	<0.1	<0.25	<5.0	<10	
B-22	8.04.09	15.0	10	25	5.8	62	102.8	1200	16	
B-22	8.04.09	20.0	<0.05	<0.05	<0.05	<0.1	<0.25	<5.0	<10	
B-23	8.04.09	15.0	<0.25	9.3	4	46	<59.55	960	18	
B-23	8.04.09	20.0	0.28	<0.05	<0.05	<0.1	<0.48	<5.0	<10	
B-24	8.04.09	15.0	<0.25	<0.25	0.63	7.9	<9.03	200	10	
B-24	8.04.09	22.0	<0.05	<0.05	<0.05	<0.1	<0.25	<5.0	<10	
B-25 B-26	8.04.09	20.0 20.0	<0.05	<0.05	<0.05	<0.1	<0.25	<5.0 <5.0	<10	
B-26 B-27	8.04.09 8.04.09	20.0	<0.05	<0.05	<0.05	<0.1	<0.25	<5.0	<10	
B-27 B-28	8.04.09	15.0	<0.05	<0.05	<0.05	<0.1	<0.25	<5.0	<10	
B-28	8.07.09	20.0	<0.05	<0.05	<0.05	<0.1	<0.25	<5.0	<10	
B-29	8.07.09	15.0	<0.05	<0.05	<0.05	<0.1	<0.25	<5.0	<10	
B-29	8.07.09	20.0	<0.05	<0.05	<0.05	<0.1	<0.25	<5.0	<10	
B-29	8.07.09	18.0	<1.0	<1.0	1.7	18	<21.7	420	17	
B-30	8.07.09	15.0	<0.05	<0.05	<0.05	<0.1	<0.25	<5.0	<10	
B-30	8.07.09	20.0	<0.05	<0.05	< 0.05	<0.1	<0.25	<5.0	<10	
and Auger -1	8.07.09	5.0	<0.05	<0.05	<0.05	<0.1	<0.25	<5.0	<10	
and Auger -2	8.07.09	14.0	<1.0	<1.0	<1.0	<3.0	<6.0	980	300	

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Note: Concentrations in **bold** and yellow exceed the applicable OCD Remediation Action Level NA = Not Analyzed

NE = Not Established NAPL = Non-aqueous phase liquid

* = piezometer well was replaced with associated monitoring well

TABLE 1 Largo Compressor Station SOIL ANALYTICAL SUMMARY											
Sample I.D.	Date	Sample Depth (feet)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	Total BTEX (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)		
The second s	/, Mineral & Nat I Conservation ation Action Le	Division,	10	NE	NE	NE	50		00		
Station of State			Soil Sample	s Collected by S	Souder, Miller and A	ssociates					
				Area 2 (Val	ve Box Area)						
Riser Wall (South)	7.01.09	5-10	NA	NA	NA	NA	NA	<5.0	28		
South Wall (East)	7.01.11	5 - 10	NA	NA	NA	NA	NA	<5.0	17		
North Wall (West)	7.01.11	5 - 10	NA	NA	NA	NA	NA	<5.0	<10		
Road Wall (North)	7.09.11	13	<0.050	<0.050	<0.050	<0.10	ND	<5.0	<10		
			TO IT I AN A	Area 3 (Reten	tion Pond Area)						
PH-6	6.26.09	Not Avail.	NA	NA	NA	NA	NA	<5.0	<10		
RPE	7.14.09	13.0	0.5	1.8	0.25	2.6	5.15	28	13		
RPES	7.14.09	0.0	<0.050	1.2	0.07	8.4	9.72	130	40		
BWT	7.15.09	20.0	14	210	45	460	729	7,200	540		
NE Wall	7.15.09	Not Avail.	9.7	67	31	230	337.7	4,000	360		
			Soil Bor	ings Advanced I	by Southwest Geso	clence					
TSW-31	11.16.10	12.0 - 14.0	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	<10		
MW-32	11.16.10	13.0 -14.0	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	<10		
MW-33	11.16.10	7.0 - 8.0	7.2	82	17	170	276.2	3,300	160		
MW-34	11.16.10	16.0 - 17.0	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	<10		
MW-35	11.17.10	9.0 - 10.0	11	130	32	300	473	7,900	440		
MW-36	11.17.10	12.0 - 13.0	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	<10		
MW-37	11.17.10	11.0 - 12.0	<0.05	14	9.5	89	112.55	2,000	290		
MW-38	11.17.10	9.0 - 10.0	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	<10		
MW-39	11.17.10	15.0 - 16.0	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	<10		
MW-40	11.17.10	16.0 - 17.0	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	<10		
MW-41	11.17.10	13.0 - 14.0	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	<10		
MW-42	11.17.10	19.0 - 20.0	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	<10		
MW-43	11.17.10	15.0 - 16.0	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	<10		
TSW-44	11.17.10	15.0 - 16.0	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	<10		
TSW-45	11.17.10	14.0 - 15.0	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	<10		
TSW-46	11.17.10	12.0 - 13.0	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	<10		
MW-47	11.22.10	16.0 - 18.0	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	<10		

Note: Concentrations in **bold** and yellow exceed the applicable OCD Remediation Action Level

NA = Not Analyzed

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NE = Not Established

NAPL = Non-aqueous phase liquid

* = piezometer well was replaced with associated monitoring well

			Tz	ABLE 2				
				npressor St				
		GRC	UNDWATER	ANALYTICAL	SUMMARY			
Completo	Data	Total	Depress	Toluene	Tibulbonzono	Vulenas	TPH	TPH
Sample I.D.	Date	Total Dissolved	Benzene	Toluene	Ethylbenzene	Xylenes	GRO	
		Solids	(µg/L)	(µg/L)	(µg/L)	(µg/L)		DRO
The Constant South		(mg/L)	No water and	a Minebeau			(mg/L)	(mg/L)
New Mexico Wate		上场和正创				E Market		
Commutation Gro Stand		NE	10	750	750	620	NE	NE
		Print	Monitoring We	ls installed by Lo	viestar			
P-1	4.04.08	NA	5,700	2,200	310	5,500	53	<1.0
P-1	8.10.09	NA	NAPL	NAPL	NAPL	NAPL	NAPL	NAPL
P-1	11.24.09	NA	NAPL	NAPL	NAPL	NAPL	NAPL	NAPL
P-1	2.25.10	NA	NAPL	NAPL	NAPL	NAPL	NAPL	NAPL
MW-12 (P-1*)	4.05.10	NA	1,300	1,600	110	2,200	20	1.2
MW-12 (P-1*)	5.27.10	NA	3,300	1,800	180	3,200	NA	NA
MW-12 (P-1*)	7.13.10	NA	2,900	330	140	1,700	22	1.0
MW-12 (P-1*) MW-12 (P-1*)	8.26.10	NA NA	1,200	420 69	70 61	1,300	13 6.3	<1.0
MW-12 (P-1*)	2.4.11	NA	1,100 5,900	<50	470	1,600	24	<1.0
MW-12 (P-1*)	4.19.11	NA	4,200	190	<100	330	14	<1.0
MW-12 (P-1*)	5.19.11	NA	1,000	520	36	660	13	15
MW-12 (P-1*)	7.28.11	NA	12,000	2,300	320	3,200	54	3.9
MW-12 (P-1*)	10.28.11	NA	4,900	59	130	3,300	29	7.3
P-2	4.04.08	NA	15,000	2,100	380	4,600	120	6.8
P-2	8.10.09	NA	9,800	110	170	1,400	NA	NA
P-2	11.24.09	NA	21,000	360	460	2,700	NA	NA
P-2	2.25.10	NA	19,000	380	380	2,800	NA	NA
MW-11 (P-2*)	4.05.10	NA	<1.0	<1.7	<1.0	3.3	0.22	<1.0
MW-11 (P-2*) MW-11 (P-2*)	7.13.10	NA	4.4 700	<1.0	<1.0	<2.0 56	NA	NA
MW-11 (P-2*)	8.26.10	NA	86	4.5	1.3	4.9	3.6 0.4	1.2
MW-11 (P-2*)	11.18.10	NA	<1.0	<1.0	<1.0	<2.0	0.14	<1.0
MW-11 (P-2*)	2.4.11	NA	21	<1.0	<1.0	<1.0	0.075	<1.0
MW-11 (P-2*)	4.19.11	NA	96	12	1.2	27	0.39	<1.0
MW-11 (P-2*)	7.28.11	NA	46	<1.0	38	76	11	1.7
MW-11 (P-2*)	10.28.11	NA	1,600	<10	31	37	4.6	2.2
P-3	4.04.08	NA	780	13	81	20	4.2	<1.0
P-3	8.10.09	NA	35	<1.0	3.8	<2.0	NA	NA
P-3	11.24.09	NA	1.4	<1.0	1.5	<2.0	NA	NA
P-3	2.25.10	NA	3.6	10	2	24	NA	NA
MW-3R (P-3*) MW-3R (P-3*)	4.05.10 5.27.10	NA NA	<1.0	<1.0	<1.0	<2.0 <2.0	<0.05 NA	<1.0 NA
MW-3R (P-3*)	7.13.10	NA	13	<1.0	1.3	6.4	1.4	1
MW-3R (P-3*)	8.26.10	NA	5.0	<1.0	<1.0	2.3	0.46	<1.0
MW-3R (P-3*)	11.18.10	NA	3.9	<1.0	<1.0	<2.0	0.47	<1.0
MW-3R (P-3*)	2.1.11	NA	2.0	<1.0	<1.0	<2.0	0.16	<1.0
MW-3R (P-3*)	4.18.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0
MW-3R (P-3*)	7.28.11	NA	1.5	<1.0	<1.0	7.1	1.50	<1.0
MW-3R (P-3*)	10.27.11	NA	1.1	<1.0	<1.0	<2.0	0.57	<1.0
P-4	4.04.08	NA	<1.0	<1.0	<1.0	<2.0	0.42	<1.0
P-4 P-4	8.10.09	NA	<1.0	<1.0	<1.0	<2.0	NA	NA
P-4	11.24.09 2.25.10	NA	<1.0 2.5	<1.0 7.5	<1.0	<2.0	NA NA	NA NA
MW-14 (P-4*)	4.05.10	NA	<1.0	<1.0	<1.0	<2.0	<0.05	<1.0
MW-14 (P-4*)	5.27.10	NA	<1.0	<1.0	<1.0	<2.0	NA	NA
MW-14 (P-4*)	7.13.10	NA	<1.0	<1.0	<1.0	<2.0	<0.05	<1.0
MW-14 (P-4*)	8.26.10	NA	<1.0	<1.0	<1.0	<2.0	<0.05	<1.0
MW-14 (P-4*)	11.18.10	NA	<1.0	<1.0	<1.0	<2.0	<0.05	<1.0
MW-14 (P-4*)	2.1.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0
MW-14 (P-4*)	4.19.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0
MW-14 (P-4*)	7.28.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0
MW-14 (P-4*)	10.27.11	NA	<1.0	<1.0	<1.0	<2.0	< 0.050	<1.0

TABLE 2 Largo Compressor Station GROUNDWATER ANALYTICAL SUMMARY									
Sample I.D.	Date	Total Dissolved Solids (mg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	TPH GRO (mg/L)	TPH DRO (mg/L)	
Commission Gr	er Quality Control oundwater Quality dards	NE	10	750	750	620	NE	NE	
P-5	4.04.08	NA	<1.0	<1.0	<1.0	<2.0	0.1	<1.0	
P-5	8.10.09	NA	<1.0	<1.0	<1.0	<2.0	NA	NA	
P-5 P-5	11.24.09 2.25.10	NA NA	<1.0	<1.0	<1.0	<2.0	NA NA	NA	
MW-13 (P-5*)	4.05.10	NA	<1.0	<1.0	<1.0	<2.0	<0.05	<1.0	
MW-13 (P-5*)	5.27.10	NA	<1.0	<1.0	<1.0	<2.0	NA	NA	
MW-13 (P-5*)	7.13.10	NA	<1.0	<1.0	<1.0	<2.0	<0.05	<1.0	
MW-13 (P-5*)	8.26.10	NA	<1.0	<1.0	<1.0	<2.0	<0.05	<1.0	
MW-13 (P-5*)	11.18.10	NA	<1.0	<1.0	<1.0	<2.0	<0.05 <0.050	<1.0	
MW-13 (P-5*) MW-13 (P-5*)	4.19.11	NA	<1.0	<1.0	<1.0 <1.0	<2.0	<0.050	<1.0	
MW-13 (P-5*)	7.28.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0	
MW-13 (P-5*)	10.27.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0	
MW-6	8.10.09	NA	<1.0	<1.0	<1.0	<2.0	NA	NA	
MW-6	11.24.09	NA	<1.0	<1.0	<1.0	<2.0	NA	NA	
MW-6 MW-6	2.25.10 4.05.10	NA	<1.0	<1.0	<1.0 <1.0	<2.0 <2.0	NA <0.05	NA <1.0	
MW-6	5.27.10	NA	<1.0	<1.0	<1.0	<2.0	NA	NA	
MW-6	7.13.10	NA	<1.0	<1.0	<1.0	<2.0	<0.05	<1.0	
MW-6	8.26.10	NA	<1.0	<1.0	<1.0	<2.0	<0.05	<1.0	
MW-6	11.18.10	NA	<1.0	<1.0	<1.0	<2.0	<0.05	<1.0	
MW-6 MW-6	1.31.11 4.19.11	NA NA	<1.0	<1.0	<1.0	<2.0 <2.0	<0.050 <0.050	<1.0	
MW-6	7.28.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0	
MW-6	10.27.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0	
MW-7	8.10.09	NA	15,000	<100	380	310	NA	NA	
MW-7	11.24.09	NA	13,000	<100	150	<200	NA	NA	
MW-7 MW-7	2.25.10	NA	3,000	<10 <10	40 <10	31	NA 4.2	NA 1.3	
MW-7 MW-7	4.05.10 5.27.10	NA NA	940 700	<10	11	<20	NA	NA	
MW-7	7.13.10	NA	15,000	<10	130	25	51	4.6	
MW-7	8.26.10	NA	5,300	<20	35	<40	18	1.7	
MW-7	11.18.10	NA	3,700	<20	62	<40	- 11	1.2	
MW-7 MW-7	2.1.11	NA	1,800	<1.0	10	4.6	2.2	<1.0	
MW-7 MW-7	4.19.11 5.19.11	NA NA	250 1,400	<1.0	2.9 15.0	<10	0.75 4.0	<1.0	
MW-7	7.28.11	NA	75	<5.0	200.0	62.0	45.0	2.7	
MW-7	10.28.11	NA	1,300	<10	140.0	<20	32.0	6.1	
MW-8	8.10.09	NA	<1.0	<1.0	<1.0	<2.0	NA	NA	
MW-8 MW-8	11.24.09	NA	<1.0	<1.0	<1.0	<2.0	NA NA	NA	
MW-8 MW-8	2.25.10	NA NA	<1.0	<1.0	<1.0 <1.0	<2.0 <2.0	<0.05	<1.0	
MW-8	5.27.10	NA	<1.0	<1.0	<1.0	<2.0	NA	NA	
MW-8	7.13.10	NA	<1.0	<1.0	<1.0	<2.0	<0.05	<1.0	
MW-8	8.26.10	NA	<1.0	<1.0	<1.0	<2.0	<0.05	<1.0	
MW-8	11.18.10	NA	<1.0	<1.0	<1.0	<2.0	<0.05	<1.0	
MW-8 MW-8	1.31.11 4.18.11	NA NA	<1.0	<1.0	<1.0	<2.0 <2.0	<0.050 <0.050	<1.0	
MW-8	7.28.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0	
MW-8	10.27.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0	
MW-9	8.10.09	NA	<1.0	<1.0	<1.0	<2.0	NA	NA	
MW-9	11.24.09	NA	<1.0	<1.0	<1.0	<2.0	NA	NA	
MW-9 MW-9	2.25.10	NA	<1.0	<1.0	<1.0	<2.0	NA CO.05	NA	
MW-9 MW-9	4.05.10 5.27.10	NA NA	<1.0	<1.0	<1.0 <1.0	<2.0 <2.0	<0.05 NA	<1.0 NA	
MW-9	7.13.10	NA	<1.0	<1.0	<1.0	<2.0	<0.05	<1.0	
MW-9	8.26.10	NA	<1.0	<1.0	<1.0	<2.0	<0.05	<1.0	
MW-9	11.18.10	NA	<1.0	<1.0	<1.0	<2.0	<0.05	<1.0	
MW-9	1.31.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0	
MW-9 MW-9	4.19.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0	
	7.29.11	NA	<1.0	<1.0	<1.0	<2.0	< 0.050	<1.0	

	TABLE 2 Largo Compressor Station GROUNDWATER ANALYTICAL SUMMARY										
Sample I.D.	Date	Total Dissolved Solids (mg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L.)	TPH GRO (mg/L)	TPH DRO (mg/L)			
Commission G	ter Quality Control roundwater Quality ndards	NE	10	750	750	620	NE	NE			
MW-15	4.05.10	NA	1.1	<1.0	<1.0	<2.0	<0.05	<1.0			
MW-15	5.27.10	NA	<1.0	<1.0	<1.0	<2.0	<0.05	<1.0			
MW-15 MW-15	7.13.10 8.26.10	NA	490 20	2.2	7.2	15 <2.0	3.2 0.095	<1.0			
MW-15	11.18.10	NA	8.9	<1.0	<1.0	<2.0	0.19	<1.0			
MW-15	2.1.11	NA	16	<1.0	<1.0	<2.0	0.06	<1.0			
MW-15	4.18.11	NA	13	<1.0	<1.0	<2.0	0.14	<1.0			
MW-15 MW-15	7.28.11	NA	1500 810	<1.0	19 <10.0	20	6.7 2.2	<1.0			
MW-16	4.05.10	NA	3.8	1.5	1.4	11	0.36	<1.0			
MW-16	5.27.10	NA	<1.0	<1.0	<1.0	<2.0	NA	NA			
MW-16 MW-16	7.13.10 8.26.10	NA NA	47	<1.0	<1.0	<2.0 <2.0	0.3	<1.0			
MW-16	11.18.10	NA	3.4	<1.0	<1.0	<2.0	0.095	<1.0			
MW-16	2.1.11	NA	61	<1.0	1.3	2.1	0.20	<1.0			
MW-16	4.18.11	NA	34	<1.0	3.7	4.4	0.16	<1.0			
MW-16 MW-16	7.28.11	NA NA	43	<1.0	1.9	<2.0 <2.0	0.29	<1.0			
TSW-31	11.23.10	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0			
MW-32	1.28.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0			
MW-32	4.19.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0			
MW-32 MW-32	7.29.11 10.26.11	NA NA	<1.0	<1.0	<1.0	<2.0 <2.0	<0.050 <0.050	<1.0			
MW-33	1.28.11	NA	NAPL	NAPL	NAPL	NAPL	NAPL	NAPL			
MW-33	4.20.11	NA	NAPL	NAPL	NAPL	NAPL	NAPL	NAPL			
MW-33 MW-33	7.28.11	NA	NAPL	NAPL	NAPL	NAPL	NAPL	NAPL			
MW-33	10.26.11	NA	NAPL <1.0	NAPL <1.0	<1.0	NAPL <2.0	NAPL <0.050	NAPL <1.0			
MW-34	4.19.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0			
MW-34	7.29.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0			
MW-34 MW-35	10.26.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0			
MW-35	1.28.11 4.20.11	NA	NAPL NAPL	NAPL NAPL	NAPL	NAPL NAPL	NAPL NAPL	NAPL NAPL			
MW-35	7.28.11	NA	NAPL	NAPL	NAPL	NAPL	NAPL	NAPL			
MW-35	10.26.11	NA	NAPL	NAPL	NAPL	NAPL	NAPL	NAPL			
MW-36 MW-36	1.31.11 4.20.11	NA NA	<1.0	<1.0	<1.0	<2.0 <2.0	<0.050 <0.050	<1.0			
MW-36	7.29.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0			
MW-36	10.27.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0			
MW-37	2.4.11	NA	3,100	6,200	700	7,000	38	3.9			
MW-37 MW-37	4.20.11 7.28.11	NA NA	2,500 NAPL	3,600 NAPL	500 NAPL	5,100 NAPL	34 NAPL	4.2 NAPL			
MW-37	10.26.11	NA	NAPL	NAPL	NAPL	NAPL	NAPL	NAPL			
MW-38	1.26.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0			
MW-38 MW-38	4.20.11 7.29.11	NA NA	<1.0	<1.0	<1.0	<2.0 <2.0	<0.050 <0.050	<1.0			
MW-38	10.27.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0			
MW-39	1.26.11	NA	1,200	730	37	570	11	<1.0			
MW-39	4.19.11	NA	120	<1.0	1.6	5.9	0.33	<1.0			
MW-39 MW-39	7.29.11	NA NA	27 260	14 <1.0	1.9	18 3.5	0.80	<1.0			
MW-40	1.28.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0			
MW-40	4.20.11	NA	<2.0	<2.0	<2.0	<4.0	<0.10	<1.0			
MW-40	7.28.11	NA	Dry	Dry	Dry	Dry	Dry	Dry			
MW-40	10.26.11	NA	Dry 5 O	Dry	Dry	Dry	Dry CO 25	Dry			
MW-41 MW-41	1.31.11 4.18.11	NA NA	<5.0 <5.0	<5.0 <5.0	<5.0 <5.0	<10 <10	<0.25 <0.25	<1.0			
MW-41	7.29.11	NA	<5.0	<5.0	<5.0	<10	<0.050	<1.0			
MW-41	10.27.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0			

TABLE 2 Largo Compressor Station GROUNDWATER ANALYTICAL SUMMARY

Sample I.D.	Date	Total Dissolved Solids (mg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	TPH GRO (mg/L)	TPH DRO (mg/L)
Commission Gro	New Mexico Water Quality Control Commission Groundwater Quality Standards		10	750	750	620	NE	NE
MW-42	2.4.11	NA	<5.0	<5.0	<5.0	<10	<0.25	NA
MW-42	3.3.11	75,400	NA	NA	NA	NA	NA	NA
MW-42	4.19.11	NA	<5.0	<5.0	<5.0	<10	<0.25	<1.0
MW-42	7.28.11	NA	Dry	Dry	Dry	Dry	Dry	Dry
MW-42	10.26.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0
MW-43	1.28.11	NA	<1.0	<1.0	<1.0	<2.0	0.06	<1.0
MW-43	4.19.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0
MW-43	7.29.11	NA	<1.0	<1.0	<1.0	<2.0	< 0.050	<1.0
MW-43	10.26.11	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0
TSW-44	11.18.10	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0
TSW-45	11.18.10	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0
TSW-46	11.23.10	NA	<1.0	<1.0	<1.0	<2.0	<0.050	<1.0
MW-47	1.28.11	NA	<5.0	<5.0	<5.0	<10	1.3	2.5
MW-47	4.18.11	NA	<5.0	<5.0	<5.0	<10	2.0	1.2
MW-47	7.28.11	NA	<5.0	<5.0	<5.0	27.0	6.6	1.1
MW-47	10.28.11	NA	<5.0	<5.0	<5.0	<10.0	1.4	2.7

Note: Concentrations in **bold** and yellow exceed the applicable OCD Remediation Action Level

NA = Not Analyzed

NE = Not Established

NAPL = Non-aqueous phase liquid

* = piezometer well was replaced with associated monitoring well