

GW-025

Investigation Report

DATE:
2005

October 27, 2005

Mr. Wayne Price
Senior Environmental Engineer
Environmental Bureau
New Mexico Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

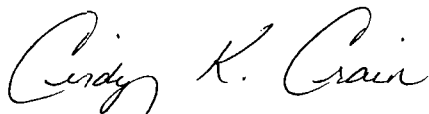
RECEIVED
NOV - 1 2005
OIL CONSERVATION
DIVISION

Re: Groundwater Discharge Plan Renewal Investigation Report, Dynegy Midstream Services, L.P., Monument Gas Plant (GW-025), Unit Letter N, Section 36, Township 19 South, Range 36 East, Lea County, New Mexico

Dear Mr. Price:

Please find enclosed a copy of the above-referenced report. The report is submitted on behalf of Dynegy Midstream Services, L. P., and presents the final results of spill remediation conducted by Larson and Associates, Inc. Please call Cal Wrangham at (432) 688-0542 or myself at (432) 687-0901 if you have questions.

Sincerely,
Larson and Associates, Inc.



Cindy K. Crain, P.G.
Project Manager/Geologist

cc: Cal Wrangham - Dynegy
James Lingnau - Dynegy
Chris Williams - NMOCD Division I

October 26, 2005

Mr. Wayne Price
Senior Environmental Engineer
Environmental Bureau
New Mexico Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

Re: Groundwater Discharge Plan Renewal Investigation Report, Dynegy Midstream Services, L.P., Monument Gas Plant (GW-025), U.L. N, Section 36, Township 19 South, Range 36 East, Lea County, New Mexico

Dear Mr. Price:

Dynegy Midstream Services, L.P. (Dynegy) has retained Larson and Associates, Inc. (LA) to conduct investigations at its Monument Gas Plant (Site) in response to conditions identified by the New Mexico Oil Conservation Division (NMOCD) during renewal of the Site groundwater discharge plan (GW-025). The Site is located in the SE/4, SW/4 (Unit Letter N), Section 36, Township 19 South, Range 36 East, Lea County, New Mexico. A report and work plan was submitted to the NMOCD on July 25, 2001 that addressed the following issues:

- | | |
|------------------|---|
| <u>Item 14 A</u> | Provide to OCD for approval a clean-up plan for the area located west of the plant, and between the gas storage brine well ponds; |
| <u>Item 14 B</u> | Investigate and provide the results for the contamination found near the west side of the oil/water tanks secondary containment; |
| <u>Item 14 D</u> | Provide an action plan for OCD approval for the #2 gas storage well and brine pond. Please identify if the well and brine pond has integrity; and |
| <u>Item 15</u> | Submit a storm water run-off plan for OCD by July 31, 2001. |

A separate work plan was issued and approved on January 22, 2002, that included removal and disposal of sediment and liner material from the #2 bring pond (Item 14 D). The report also included the results of an investigation of the area near the oil/water tanks secondary containment (Item 14 B) where staining was identified by the NMOCD during its inspection of the Site. The remediation plan proposed tilling and amendments (i.e. fertilizer) to bioremediate the spill. Dynegy proposed to investigate soils beneath the #2 brine pond as a method to determining integrity of the liner (Item 14 D). Dynegy also proposed a mechanical integrity test (MIT) of the temporarily abandoned #2 brine storage well if and when the well is placed in service. The NMOCD requested that Dynegy conduct a MIT prior to January 1, 2003. A storm water management plan was included in the July 25, 2001 report (Item 15), was approved, and implemented.

On January 8, 2004, a Groundwater Discharge Plan Renewal Investigation Report was submitted to the NMOCD that reported the completion of Items 14 A and 14 D. The report also detailed the initial investigation and remediation efforts conducted at the secondary containment

area (Item 14 B). Dynegey proposed to excavate soil with total petroleum hydrocarbons (TPH) concentrations above 100 milligrams per kilogram (mg/kg) at the area east of the #1 brine pond. Figure 1 presents a Site location map. Figure 2 presents a detailed drawing of the area.

Current Investigation

As reported on January 8, 2004, Dynegey tilled the soil near the secondary containment of the oil/water tanks (east of the #1 brine pond) where TPH exceeded the regulatory threshold of 100 milligrams per kilogram (mg/kg). Initial soil samples revealed that the impact was limited to about 2 feet below ground surface (bgs), and extended to about 4 feet bgs at location HA-4. The soil was tilled and nitrogen fertilizer was added to promote bioremediation of the TPH. Soil samples were collected on January 2, 2003 and June 4, 2003, and showed that the TPH had been reduced to concentrations below the regulatory threshold (100 mg/kg) at two (2) locations (HA-3 and HA-5), but remained above the regulatory threshold at three (3) locations (HA-1, HA-2 and HA-4). Dynegey proposed to remediate the remaining TPH by excavating the soil for disposal at an NMOCD permitted facility.

On September 14, 2004, excavation began at the secondary containment area and samples (SF-1 through SF-5) were collected at a depth of approximately four (4) feet below ground surface (bgs). The samples were placed in clean glass sample jars, labeled and chilled in an ice chest until they were hand delivered, under chain of custody control, to Environmental Lab of Texas (ELOT) located in Odessa, Texas. The soil samples were analyzed for TPH by EPA method SW-846-8015. A duplicate of each sample was collected for headspace analysis. The headspace jars were filled approximately $\frac{3}{4}$ full, and a layer of aluminum foil was placed over the opening of the jars before replacing the cap. The headspace samples were set aside and allowed to warm up to ambient temperature before a RAE Instruments, Model 2000 photoionization detector (PID) was used to measure the concentration of organic vapors in the sample headspace. The PID probe was inserted into the headspace of the sample jars (through the aluminum foil), and the concentration of organic vapors was displayed by the instrument in parts per million (ppm), and recorded in a bound field notebook. The PID was calibrated to 99.8 ppm isobutylene prior to obtaining headspace readings. Excavated soil was placed adjacent to the excavation and blended to reduce TPH concentrations below 100 mg/kg.

Table 1 presents a summary of the laboratory analyses of soil samples and PID readings. Figure 2 shows the location of the samples. Appendix A presents laboratory data and chain of custody documentation.

Referring to Table 1, only sample SF-1 (located south of HA-4) reported a TPH concentration (274.1 mg/kg) greater than 100 mg/kg. On September 23, 2004, excavation continued at the area south of HA-4, until a sample (SF-6) was collected at a depth of approximately five (5) feet bgs, and a sample was collected from the spoil pile. The samples were placed in clean glass sample jars, labeled and chilled in an ice chest until they were hand delivered, under chain of custody control, to ELOT and analyzed for TPH. A duplicate of each sample was collected for headspace analysis, as described above. Table 1 presents a summary of the laboratory analyses of soil samples and PID readings. Figure 2 shows the location of the samples. Appendix A presents laboratory data and chain of custody documentation.

Mr. Wayne Price
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October 26, 2005

Referring to Table 1, sample SF-6 and the spoil sample reported concentrations of TPH above 100 mg/kg (420 mg/kg and 528.5 mg/kg, respectively). Blending of the stockpiled soil continued periodically until February 23, 2005, when the area south of HA-4 was excavated to a depth of approximately nine (9) feet bgs, and samples were collected from the excavation (SF-7, SF-8 and SF-9) and the stockpiled soil. The samples were placed in clean glass sample jars, labeled and chilled in an ice chest until they were hand delivered, under chain of custody control, to ELOT and analyzed for TPH and chloride by EPA method 300. A duplicate of each sample was collected for headspace analysis, as described above. Table 1 presents a summary of the laboratory analyses of soil samples and PID readings. Figure 2 shows the location of the samples. Appendix A presents laboratory data and chain of custody documentation.

Referring to Table 1, samples from the excavation (SF-7, SF-8 and SF-9) reported TPH concentrations below 100 mg/kg (24.8 mg/kg, <20 mg/kg, and <20 mg/kg, respectively). The sample from the spoil pile reported a TPH concentration above 100 mg/kg (267.9 mg/kg), and periodic blending of the stockpiled soil continued until a sample was collected on May 17, 2005, that reported a TPH concentration of 68.3 mg/kg.

The excavation was backfilled with blended soil on July 14, 2005. Dynegey feels that all conditions identified by the NMOCD during the 2001 renewal of the Site groundwater discharge plan (GW-025) have been completed. If you have any questions, or need additional information, please contact Mr. Cal Wrangham at (432) 688-0542 or myself at (432) 687-0901, or we may be reached by e-mail at Cal.Wrangham@Dynegey.com or cindy@LAenvironmental.com.

Sincerely,
Larson and Associates, Inc.



Cindy K. Crain, P.G.
Project Manager/Geologist

Encl.

cc: Cal Wrangham - Dynegey
James Lingnau - Dynegey
Chris Williams - NMOCD District I

Table

Table 1: Summary of Headspace and Laboratory Analyses of Soil Samples
Dynegy Midstream Services, L.P., Monument Gas Plant (GW-025)
SE/4, SW/4, Section 36, Township 19 South, Range 36 East
Lea County, New Mexico

Page 1 of 1

Sample Number	Sample Date	Sample Depth (Feet bgs)	Sample Location	PID Reading	GRO C6-C12 (mg/kg)	DRO >C12-C35 (mg/kg)	TPH C6-C35 (mg/kg)	Chloride (mg/kg)
RRAL								
SF-1	9/14/2004	4.0	South of HA-4	0.3	10.1	264.0	274.1	---
SF-2	9/14/2004	4.0	South of HA-2	0.3	<10.0	40.3	40.3	---
SF-3	9/14/2004	4.0	NE of HA-4	0.2	<10.0	<10.0	<20.0	---
SF-4	9/14/2004	4.0	South of HA-2	0.3	<10.0	<10.0	<20.0	---
SF-5	9/14/2004	4.0	South of HA-4	0.8	<10.0	96.1	96.1	---
SF-6	9/23/2004	5.0	South of HA-4	5.0	148.0	273.0	420.0	---
SF-7	2/23/2005	3.0	South of HA-1	3.6	<10.0	24.8	24.8	100.0
SF-8	2/23/2005	9.0	South of HA-4	2.8	<10.0	<10.0	<20.0	398.0
SF-9	2/23/2005	7.5	South of HA-4	3.4	<10.0	<10.0	<20.0	92.2
Spoil	9/23/2004	---	---	4.8	42.5	486.0	528.5	---
Spoil	2/23/2005	---	---	5.2	8.9	259.0	267.9	740.0
Spoil	5/17/2005	---	---	1.7	<10.0	68.3	68.30	314.00

Notes: Analysis performed by Environmental Lab of Texas, Inc., Odessa, Texas

1. BGS: Sample depth in feet below ground surface
2. DRO: Diesel-range organics
3. GRO: Gasoline-range organics
4. TPH: Total petroleum hydrocarbons (Sum of DRO + GRO)
5. mg/kg: Milligrams per kilogram
6. <: Below method detection limit

Figures

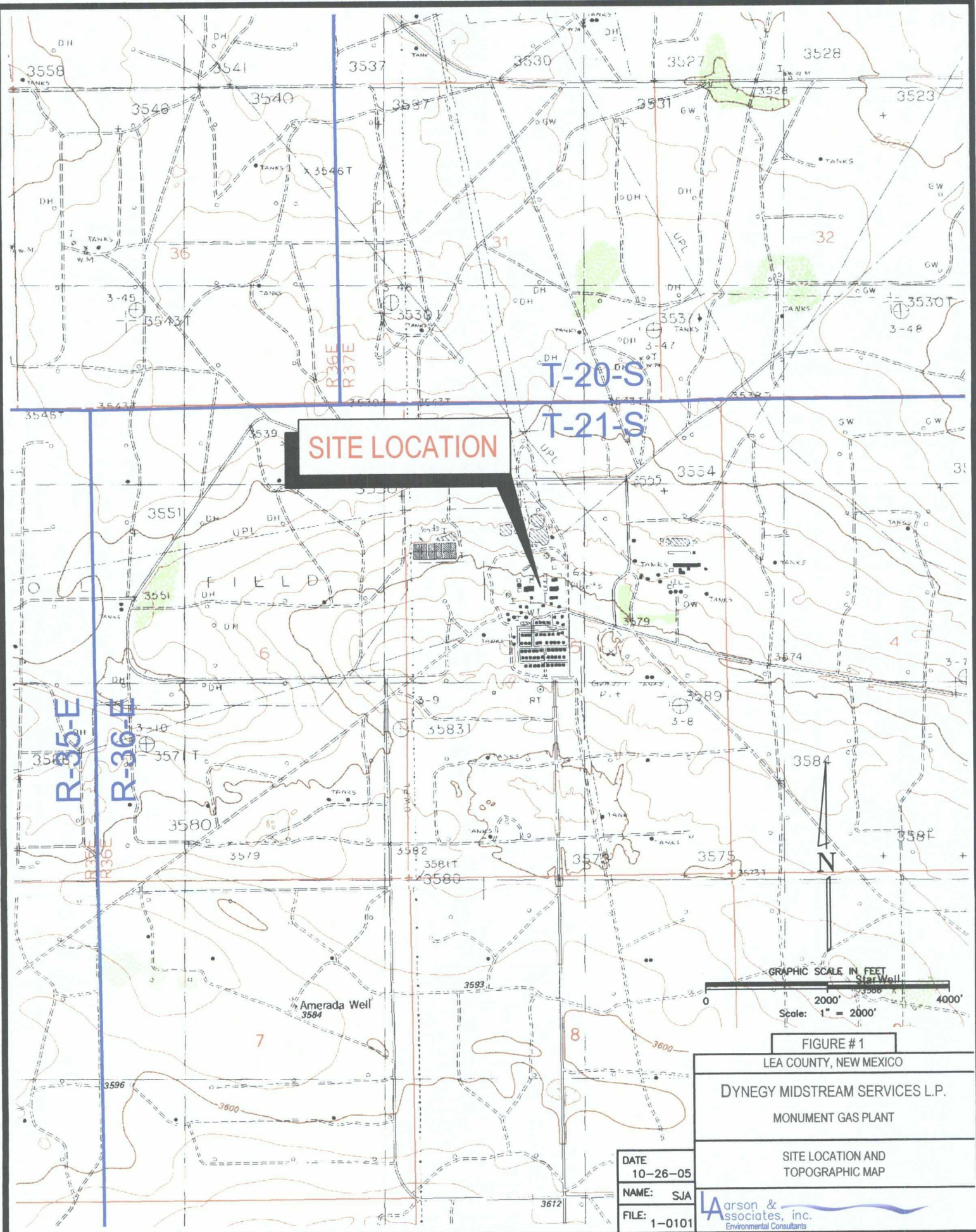
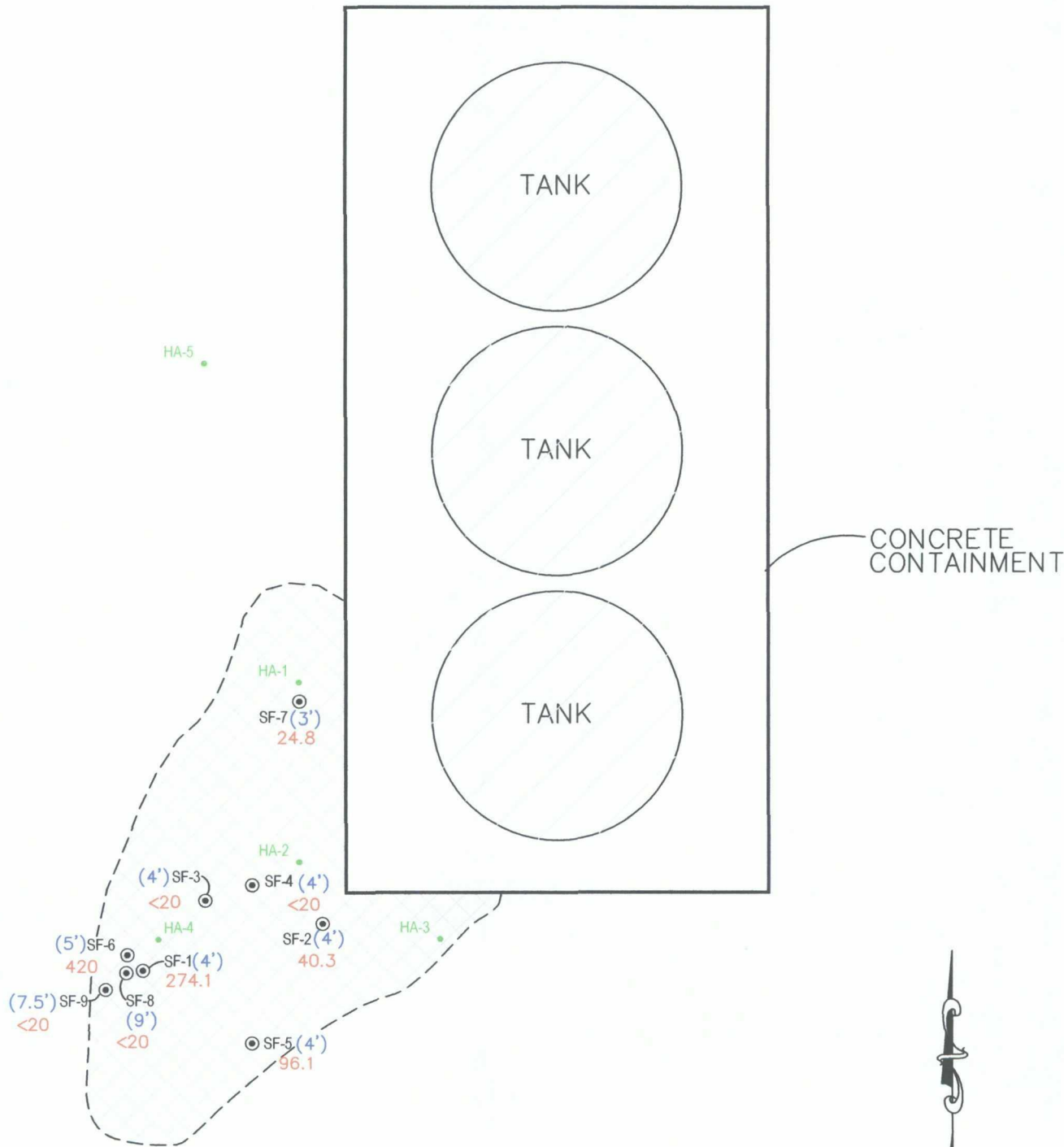
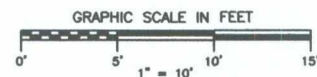


FIGURE #1	
LEA COUNTY, NEW MEXICO	
DYNEGY MIDSTREAM SERVICES L.P.	
MONUMENT GAS PLANT	
SITE LOCATION AND TOPOGRAPHIC MAP	
DATE 10-26-05	Larson & Associates, Inc. Environmental Consultants
NAME: SJA	
FILE: 1-0101	



CONCRETE
CONTAINMENT



LEGEND

- HA-1 • - HAND AUGER SOIL SAMPLE LOCATION
- ⊙ SF-1 (4') 274.1 - SOIL SAMPLE LOCATION WITH DEPTH (FEET) AND TPH CONCENTRATION (MG/KG)
- - - EXCAVATION BOUNDARY

FIGURE #2

LEA COUNTY, NEW MEXICO

DYNEGY MIDSTREAM SERVICES L.P.

MONUMENT GAS PLANT

STORAGE TANK
AREA EAST OF BRINE POND

DATE
10-26-05

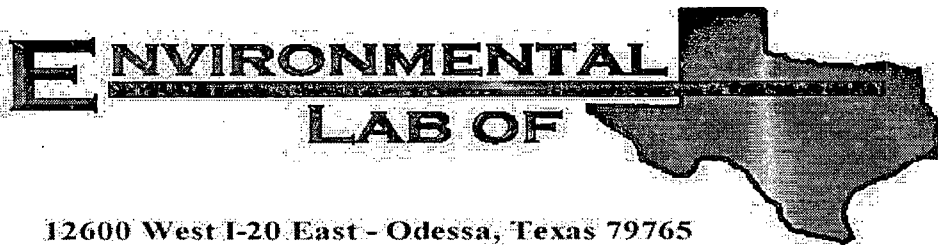
NAME: SJA

FILE: 1-0101

Larson & Associates, Inc.
Environmental Consultants

Appendix A

Laboratory Reports



Analytical Report

Prepared for:

Mark Larson
Larson & Associates, Inc.
P.O. Box 50685
Midland, TX 79710

Project: Dynegy Monument Plant

Project Number: 1-0101

Location: None Given

Lab Order Number: 4I15001

Report Date: 09/21/04

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynegey Monument Plant
Project Number: 1-0101
Project Manager: Mark Larson

Fax: (432) 687-0456

Reported:
09/21/04 12:50

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
SF-1	4I15001-01	Soil	09/14/04 09:33	09/14/04 16:35
SF-2	4I15001-02	Soil	09/14/04 09:56	09/14/04 16:35
SF-3	4I15001-03	Soil	09/14/04 10:43	09/14/04 16:35
SF-4	4I15001-04	Soil	09/14/04 10:45	09/14/04 16:35
SF-5	4I15001-05	Soil	09/14/04 10:50	09/14/04 16:35

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynegey Monument Plant
Project Number: 1-0101
Project Manager: Mark Larson

Fax: (432) 687-0456

Reported:
09/21/04 12:50

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
SF-1 (4I15001-01) Soil									
Gasoline Range Organics C6-C12	10.1	10.0	mg/kg dry	1	EI41404	09/15/04	09/20/04	EPA 8015M	
Diesel Range Organics >C12-C35	264	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	274	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		96.6 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		112 %	70-130		"	"	"	"	
SF-2 (4I15001-02) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EI41404	09/15/04	09/19/04	EPA 8015M	
Diesel Range Organics >C12-C35	40.3	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	40.3	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		93.2 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		95.0 %	70-130		"	"	"	"	
SF-3 (4I15001-03) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EI41404	09/15/04	09/19/04	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		98.0 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		96.8 %	70-130		"	"	"	"	
SF-4 (4I15001-04) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EI41404	09/15/04	09/19/04	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		97.2 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		93.8 %	70-130		"	"	"	"	
SF-5 (4I15001-05) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EI41404	09/15/04	09/19/04	EPA 8015M	
Diesel Range Organics >C12-C35	96.1	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	96.1	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		87.6 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		87.6 %	70-130		"	"	"	"	

Environmental Lab of Texas

The results in this report apply to the samples analyzed in accordance with the samples received in the laboratory. This analytical report must be reproduced in its entirety, with written approval of Environmental Lab of Texas.

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Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynege Monument Plant
Project Number: 1-0101
Project Manager: Mark Larson

Fax: (432) 687-0456

Reported:
09/21/04 12:50

General Chemistry Parameters by EPA / Standard Methods
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
SF-1 (4I15001-01) Soil									
% Solids	83.0		%	1	EI41610	09/15/04	09/15/04	% calculation	
SF-2 (4I15001-02) Soil									
% Solids	89.0		%	1	EI41610	09/15/04	09/15/04	% calculation	
SF-3 (4I15001-03) Soil									
% Solids	85.0		%	1	EI41610	09/15/04	09/15/04	% calculation	
SF-4 (4I15001-04) Soil									
% Solids	87.0		%	1	EI41610	09/15/04	09/15/04	% calculation	
SF-5 (4I15001-05) Soil									
% Solids	85.0		%	1	EI41610	09/15/04	09/15/04	% calculation	

Environmental Lab of Texas

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Page 3 of 7

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynegey Monument Plant
Project Number: 1-0101
Project Manager: Mark Larson

Fax: (432) 687-0456

Reported:
09/21/04 12:50

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch EI41404 - Solvent Extraction (GC)

Blank (EI41404-BLK1)

Prepared: 09/14/04 Analyzed: 09/16/04

Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet							
Diesel Range Organics >C12-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	39.6		mg/kg	50.0		79.2	70-130			
Surrogate: 1-Chlorooctadecane	36.4		"	50.0		72.8	70-130			

Blank (EI41404-BLK2)

Prepared: 09/14/04 Analyzed: 09/17/04

Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet							
Diesel Range Organics >C12-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	41.9		mg/kg	50.0		83.8	70-130			
Surrogate: 1-Chlorooctadecane	36.0		"	50.0		72.0	70-130			

LCS (EI41404-BS1)

Prepared: 09/14/04 Analyzed: 09/16/04

Gasoline Range Organics C6-C12	414	10.0	mg/kg wet	500		82.8	75-125			
Diesel Range Organics >C12-C35	469	10.0	"	500		93.8	75-125			
Total Hydrocarbon C6-C35	883	10.0	"	1000		88.3	75-125			
Surrogate: 1-Chlorooctane	40.7		mg/kg	50.0		81.4	70-130			
Surrogate: 1-Chlorooctadecane	40.1		"	50.0		80.2	70-130			

LCS (EI41404-BS2)

Prepared: 09/14/04 Analyzed: 09/17/04

Gasoline Range Organics C6-C12	465	10.0	mg/kg wet	500		93.0	75-125			
Diesel Range Organics >C12-C35	496	10.0	"	500		99.2	75-125			
Total Hydrocarbon C6-C35	961	10.0	"	1000		96.1	75-125			
Surrogate: 1-Chlorooctane	43.2		mg/kg	50.0		86.4	70-130			
Surrogate: 1-Chlorooctadecane	39.1		"	50.0		78.2	70-130			

Calibration Check (EI41404-CCV1)

Prepared: 09/14/04 Analyzed: 09/16/04

Gasoline Range Organics C6-C12	440		mg/kg	500		88.0	80-120			
Diesel Range Organics >C12-C35	584		"	500		117	80-120			
Total Hydrocarbon C6-C35	1020		"	1000		102	80-120			
Surrogate: 1-Chlorooctane	52.6		"	50.0		105	70-130			
Surrogate: 1-Chlorooctadecane	61.3		"	50.0		123	70-130			

Environmental Lab of Texas

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Page 4 of 7

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynegey Monument Plant
Project Number: 1-0101
Project Manager: Mark Larson

Fax: (432) 687-0456

Reported:
09/21/04 12:50

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch EI41404 - Solvent Extraction (GC)

Calibration Check (EI41404-CCV2)

Prepared: 09/14/04 Analyzed: 09/17/04

Gasoline Range Organics C6-C12	438		mg/kg	500		87.6	80-120			
Diesel Range Organics >C12-C35	520		"	500		104	80-120			
Total Hydrocarbon C6-C35	958		"	1000		95.8	80-120			
Surrogate: 1-Chlorooctane	51.3		"	50.0		103	70-130			
Surrogate: 1-Chlorooctadecane	38.8		"	50.0		77.6	70-130			

Matrix Spike (EI41404-MS1)

Source: 4114003-12

Prepared: 09/14/04 Analyzed: 09/17/04

Gasoline Range Organics C6-C12	572	10.0	mg/kg dry	617	11.8	90.8	75-125			
Diesel Range Organics >C12-C35	773	10.0	"	617	53.9	117	75-125			
Total Hydrocarbon C6-C35	1350	10.0	"	1230	65.7	104	75-125			
Surrogate: 1-Chlorooctane	56.7		mg/kg	50.0		113	70-130			
Surrogate: 1-Chlorooctadecane	56.2		"	50.0		112	70-130			

Matrix Spike (EI41404-MS2)

Source: 4114004-06

Prepared: 09/14/04 Analyzed: 09/17/04

Gasoline Range Organics C6-C12	533	10.0	mg/kg dry	549	ND	97.1	75-125			
Diesel Range Organics >C12-C35	616	10.0	"	549	ND	112	75-125			
Total Hydrocarbon C6-C35	1150	10.0	"	1100	ND	105	75-125			
Surrogate: 1-Chlorooctane	56.4		mg/kg	50.0		113	70-130			
Surrogate: 1-Chlorooctadecane	41.1		"	50.0		82.2	70-130			

Matrix Spike Dup (EI41404-MSD1)

Source: 4114003-12

Prepared: 09/14/04 Analyzed: 09/17/04

Gasoline Range Organics C6-C12	661	10.0	mg/kg dry	617	11.8	105	75-125	14.4	20	
Diesel Range Organics >C12-C35	757	10.0	"	617	53.9	114	75-125	2.09	20	
Total Hydrocarbon C6-C35	1420	10.0	"	1230	65.7	110	75-125	5.05	20	
Surrogate: 1-Chlorooctane	57.3		mg/kg	50.0		115	70-130			
Surrogate: 1-Chlorooctadecane	56.7		"	50.0		113	70-130			

Matrix Spike Dup (EI41404-MSD2)

Source: 4114004-06

Prepared: 09/14/04 Analyzed: 09/17/04

Gasoline Range Organics C6-C12	507	10.0	mg/kg dry	549	ND	92.3	75-125	5.00	20	
Diesel Range Organics >C12-C35	609	10.0	"	549	ND	111	75-125	1.14	20	
Total Hydrocarbon C6-C35	1120	10.0	"	1100	ND	102	75-125	2.64	20	
Surrogate: 1-Chlorooctane	54.0		mg/kg	50.0		108	70-130			
Surrogate: 1-Chlorooctadecane	36.9		"	50.0		73.8	70-130			

Environmental Lab of Texas

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Page 5 of 7

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynegey Monument Plant
Project Number: 1-0101
Project Manager: Mark Larson

Fax: (432) 687-0456

Reported:
09/21/04 12:50

General Chemistry Parameters by EPA / Standard Methods - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch EI41610 - General Preparation (Prep)

Blank (EI41610-BLK1)

Prepared & Analyzed: 09/15/04

% Solids	100	%
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Duplicate (EI41610-DUP1)

Source: 4I14007-01

Prepared & Analyzed: 09/15/04

% Solids	97.0	%	97.0	0.00	20
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Environmental Lab of Texas

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Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynege Monument Plant
Project Number: 1-0101
Project Manager: Mark Larson

Fax: (432) 687-0456

Reported:
09/21/04 12:50

Notes and Definitions

DET Analyte DETECTED
ND Analyte NOT DETECTED at or above the reporting limit
NR Not Reported
dry Sample results reported on a dry weight basis
RPD Relative Percent Difference
LCS Laboratory Control Spike
MS Matrix Spike
Dup Duplicate

Report Approved By:

Raland K. Tuttle

Date:

9-21-04

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer

Jeanne Mc Murrey, Inorg. Tech Director
James L. Hawkins, Chemist/Geologist
Sandra Biezugbe, Lab Tech.

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Environmental Lab of Texas

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Environmental Lab of Texas

Variance / Corrective Action Report – Sample Log-In

Client: Larson's Associates

Date/Time: 09-15-04 @ 0830

Order #: 4 I15001

Initials: JMM

Sample Receipt Checklist

Temperature of container/cooler?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	4.0 C
Shipping container/cooler in good condition?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Custody Seals intact on shipping container/cooler?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Not present
Custody Seals intact on sample bottles?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Not present
Chain of custody present?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Sample Instructions complete on Chain of Custody?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Chain of Custody signed when relinquished and received?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Chain of custody agrees with sample label(s)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Container labels legible and intact?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Sample Matrix and properties same as on chain of custody?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Samples in proper container/bottle?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Samples properly preserved?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Sample bottles intact?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Preservations documented on Chain of Custody?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Containers documented on Chain of Custody?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Sufficient sample amount for indicated test?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
All samples received within sufficient hold time?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
VOC samples have zero headspace?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Not Applicable

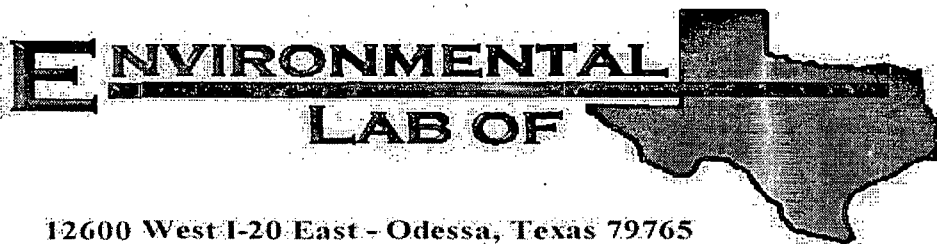
Other observations:

Variance Documentation:

Contact Person: - _____ Date/Time: _____ Contacted by: _____
Regarding: _____

Corrective Action Taken:

[illegible]



Analytical Report

Prepared for:

Cindy Crain

Larson & Associates, Inc.

P.O. Box 50685

Midland, TX 79710

Project: Dynegy/ Storage Tank Area

Project Number: 1-0101

Location: None Given

Lab Order Number: 4I23018

Report Date: 09/28/04

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynege/ Storage Tank Area
Project Number: 1-0101
Project Manager: Cindy Crain

Fax: (432) 687-0456

Reported:
09/28/04 08:07

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
SF-6	4I23018-01	Soil	09/23/04 08:30	09/23/04 13:45
Soil Piles (Comp.)	4I23018-02	Soil	09/23/04 08:47	09/23/04 13:45

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynegy/ Storage Tank Area
Project Number: 1-0101
Project Manager: Cindy Crain

Fax: (432) 687-0456

Reported:
09/28/04 08:07

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
SF-6 (4123018-01) Soil									
Gasoline Range Organics C6-C12	148	10.0	mg/kg dry	1	EI42406	09/24/04	09/25/04	EPA 8015M	
Diesel Range Organics >C12-C35	273	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	420	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		104 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		72.8 %	70-130		"	"	"	"	
Soil Piles (Comp.) (4123018-02) Soil									
Gasoline Range Organics C6-C12	42.5	10.0	mg/kg dry	1	EI42406	09/24/04	09/25/04	EPA 8015M	
Diesel Range Organics >C12-C35	486	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	529	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		108 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		71.4 %	70-130		"	"	"	"	

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynege/ Storage Tank Area
Project Number: 1-0101
Project Manager: Cindy Crain

Fax: (432) 687-0456

Reported:
09/28/04 08:07

General Chemistry Parameters by EPA / Standard Methods
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
SF-6 (4123018-01) Soil									
% Solids	86.0		%	1	E142712	09/24/04	09/24/04	% calculation	
Soil Piles (Comp.) (4123018-02) Soil									
% Solids	99.0		%	1	E142712	09/24/04	09/24/04	% calculation	

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynege/ Storage Tank Area
Project Number: 1-0101
Project Manager: Cindy Crain

Fax: (432) 687-0456

Reported:
09/28/04 08:07

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch EI42406 - Solvent Extraction (GC)

Blank (EI42406-BLK1)

Prepared: 09/24/04 Analyzed: 09/25/04

Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet							
Diesel Range Organics >C12-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	47.2		mg/kg	50.0		94.4	70-130			
Surrogate: 1-Chlorooctadecane	35.3		"	50.0		70.6	70-130			

Blank (EI42406-BLK2)

Prepared: 09/24/04 Analyzed: 09/25/04

Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet							
Diesel Range Organics >C12-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	48.3		mg/kg	50.0		96.6	70-130			
Surrogate: 1-Chlorooctadecane	36.7		"	50.0		73.4	70-130			

LCS (EI42406-BS1)

Prepared: 09/24/04 Analyzed: 09/25/04

Gasoline Range Organics C6-C12	436	10.0	mg/kg wet	500		87.2	75-125			
Diesel Range Organics >C12-C35	469	10.0	"	500		93.8	75-125			
Total Hydrocarbon C6-C35	905	10.0	"	1000		90.5	75-125			
Surrogate: 1-Chlorooctane	56.6		mg/kg	50.0		113	70-130			
Surrogate: 1-Chlorooctadecane	40.6		"	50.0		81.2	70-130			

LCS (EI42406-BS2)

Prepared: 09/24/04 Analyzed: 09/25/04

Gasoline Range Organics C6-C12	436	10.0	mg/kg wet	500		87.2	75-125			
Diesel Range Organics >C12-C35	457	10.0	"	500		91.4	75-125			
Total Hydrocarbon C6-C35	893	10.0	"	1000		89.3	75-125			
Surrogate: 1-Chlorooctane	55.6		mg/kg	50.0		111	70-130			
Surrogate: 1-Chlorooctadecane	38.2		"	50.0		76.4	70-130			

Calibration Check (EI42406-CCV1)

Prepared: 09/24/04 Analyzed: 09/25/04

Gasoline Range Organics C6-C12	485		mg/kg	500		97.0	80-120			
Diesel Range Organics >C12-C35	546		"	500		109	80-120			
Total Hydrocarbon C6-C35	1030		"	1000		103	80-120			
Surrogate: 1-Chlorooctane	61.3		"	50.0		123	70-130			
Surrogate: 1-Chlorooctadecane	58.1		"	50.0		116	70-130			

Environmental Lab of Texas

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Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynege/ Storage Tank Area
Project Number: 1-0101
Project Manager: Cindy Crain

Fax: (432) 687-0456

Reported:
09/28/04 08:07

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch EI42406 - Solvent Extraction (GC)

Calibration Check (EI42406-CCV2)

Prepared: 09/24/04 Analyzed: 09/25/04

Gasoline Range Organics C6-C12	506		mg/kg	500		101	80-120			
Diesel Range Organics >C12-C35	572		"	500		114	80-120			
Total Hydrocarbon C6-C35	1080		"	1000		108	80-120			
Surrogate: 1-Chlorooctane	62.6		"	50.0		125	70-130			
Surrogate: 1-Chlorooctadecane	51.7		"	50.0		103	70-130			

Matrix Spike (EI42406-MS1)

Source: 4I23014-04

Prepared: 09/24/04 Analyzed: 09/25/04

Gasoline Range Organics C6-C12	555	10.0	mg/kg dry	617	ND	90.0	75-125			
Diesel Range Organics >C12-C35	626	10.0	"	617	ND	101	75-125			
Total Hydrocarbon C6-C35	1180	10.0	"	1230	ND	95.9	75-125			
Surrogate: 1-Chlorooctane	56.2		mg/kg	50.0		112	70-130			
Surrogate: 1-Chlorooctadecane	36.7		"	50.0		73.4	70-130			

Matrix Spike (EI42406-MS2)

Source: 4I24010-01

Prepared: 09/24/04 Analyzed: 09/25/04

Gasoline Range Organics C6-C12	509	10.0	mg/kg dry	526	ND	96.8	75-125			
Diesel Range Organics >C12-C35	599	10.0	"	526	ND	114	75-125			
Total Hydrocarbon C6-C35	1110	10.0	"	1050	ND	106	75-125			
Surrogate: 1-Chlorooctane	63.1		mg/kg	50.0		126	70-130			
Surrogate: 1-Chlorooctadecane	48.9		"	50.0		97.8	70-130			

Matrix Spike Dup (EI42406-MSD1)

Source: 4I23014-04

Prepared: 09/24/04 Analyzed: 09/25/04

Gasoline Range Organics C6-C12	562	10.0	mg/kg dry	617	ND	91.1	75-125	1.25	20	
Diesel Range Organics >C12-C35	630	10.0	"	617	ND	102	75-125	0.637	20	
Total Hydrocarbon C6-C35	1190	10.0	"	1230	ND	96.7	75-125	0.844	20	
Surrogate: 1-Chlorooctane	54.5		mg/kg	50.0		109	70-130			
Surrogate: 1-Chlorooctadecane	37.0		"	50.0		74.0	70-130			

Matrix Spike Dup (EI42406-MSD2)

Source: 4I24010-01

Prepared: 09/24/04 Analyzed: 09/25/04

Gasoline Range Organics C6-C12	491	10.0	mg/kg dry	526	ND	93.3	75-125	3.60	20	
Diesel Range Organics >C12-C35	573	10.0	"	526	ND	109	75-125	4.44	20	
Total Hydrocarbon C6-C35	1060	10.0	"	1050	ND	101	75-125	4.61	20	
Surrogate: 1-Chlorooctane	59.9		mg/kg	50.0		120	70-130			
Surrogate: 1-Chlorooctadecane	45.3		"	50.0		90.6	70-130			

Environmental Lab of Texas

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Page 5 of 7

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynegy/ Storage Tank Area
Project Number: 1-0101
Project Manager: Cindy Crain

Fax: (432) 687-0456

Reported:
09/28/04 08:07

General Chemistry Parameters by EPA / Standard Methods - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch EI42712 - % Solids

Blank (EI42712-BLK1)

Prepared & Analyzed: 09/24/04

% Solids	100	%
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Duplicate (EI42712-DUP1)

Source: 4I22009-01

Prepared & Analyzed: 09/24/04

% Solids	81.0	%	81.0	0.00	20
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Environmental Lab of Texas

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Page 6 of 7

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynege/ Storage Tank Area
Project Number: 1-0101
Project Manager: Cindy Crain

Fax: (432) 687-0456

Reported:
09/28/04 08:07

Notes and Definitions

DET Analyte DETECTED
ND Analyte NOT DETECTED at or above the reporting limit
NR Not Reported
dry Sample results reported on a dry weight basis
RPD Relative Percent Difference
LCS Laboratory Control Spike
MS Matrix Spike
Dup Duplicate

Report Approved By:

Raland K. Tuttle

Date:

9-29-04

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer

Jeanne Mc Murrey, Inorg. Tech Director
James L. Hawkins, Chemist/Geologist
Sandra Biezugbe, Lab Tech.

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Environmental Lab of Texas

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Environmental Lab of Texas

Variance / Corrective Action Report – Sample Log-In

Client: Larson Associates

Date/Time: 09-23-04 @ 1445

Order #: LI 23018

Initials: JMM

Sample Receipt Checklist

Temperature of container/cooler?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	1.5	C
Shipping container/cooler in good condition?	<input checked="" type="radio"/> Yes	<input type="radio"/> No		
Custody Seals intact on shipping container/cooler?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not present	
Custody Seals intact on sample bottles?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not present	
Chain of custody present?	<input checked="" type="radio"/> Yes	<input type="radio"/> No		
Sample Instructions complete on Chain of Custody?	<input checked="" type="radio"/> Yes	<input type="radio"/> No		
Chain of Custody signed when relinquished and received?	<input checked="" type="radio"/> Yes	<input type="radio"/> No		
Chain of custody agrees with sample label(s)	<input checked="" type="radio"/> Yes	<input type="radio"/> No		
Container labels legible and intact?	<input checked="" type="radio"/> Yes	<input type="radio"/> No		
Sample Matrix and properties same as on chain of custody?	<input checked="" type="radio"/> Yes	<input type="radio"/> No		
Samples in proper container/bottle?	<input checked="" type="radio"/> Yes	<input type="radio"/> No		
Samples properly preserved?	<input checked="" type="radio"/> Yes	<input type="radio"/> No		
Sample bottles intact?	<input checked="" type="radio"/> Yes	<input type="radio"/> No		
Preservations documented on Chain of Custody?	<input checked="" type="radio"/> Yes	<input type="radio"/> No		
Containers documented on Chain of Custody?	<input checked="" type="radio"/> Yes	<input type="radio"/> No		
Sufficient sample amount for indicated test?	<input checked="" type="radio"/> Yes	<input type="radio"/> No		
All samples received within sufficient hold time?	<input checked="" type="radio"/> Yes	<input type="radio"/> No		
VOC samples have zero headspace?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	Not Applicable	

Other observations:

Variance Documentation:

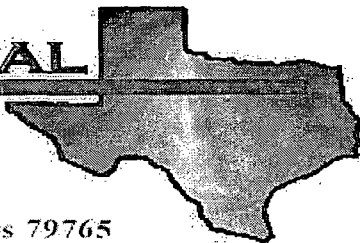
Contact Person: - _____ Date/Time: _____ Contacted by: _____
Regarding: _____

Corrective Action Taken:

CHAIN—OF—CUSTODY RECORD

[illegible]

ENVIRONMENTAL LAB OF



12600 West I-20 East - Odessa, Texas 79765

Analytical Report

Prepared for:

Cindy Crain

Larson & Associates, Inc.

P.O. Box 50685

Midland, TX 79710

Project: Dynegy Monument

Project Number: 1-0101

Location: None Given

Lab Order Number: 5B24003

Report Date: 02/25/05

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynegey Monument
Project Number: 1-0101
Project Manager: Cindy Crain

Fax: (432) 687-0456

Reported:
02/25/05 11:07

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
SF-7	5B24003-01	Soil	02/23/05 09:00	02/24/05 09:35
SF-8	5B24003-02	Soil	02/23/05 09:45	02/24/05 09:35
SF-9	5B24003-03	Soil	02/23/05 09:50	02/24/05 09:35
Spoil	5B24003-04	Soil	02/23/05 09:10	02/24/05 09:35

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynegey Monument
Project Number: 1-0101
Project Manager: Cindy Crain

Fax: (432) 687-0456

Reported:
02/25/05 11:07

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
SF-7 (5B24003-01) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EB52307	02/24/05	02/24/05	EPA 8015M	
Diesel Range Organics >C12-C35	24.8	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	24.8	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		88.2 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		107 %	70-130		"	"	"	"	
SF-8 (5B24003-02) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EB52307	02/24/05	02/24/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		89.0 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		101 %	70-130		"	"	"	"	
SF-9 (5B24003-03) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EB52307	02/24/05	02/24/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		86.6 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		101 %	70-130		"	"	"	"	
Spoil (5B24003-04) Soil									
Gasoline Range Organics C6-C12	J [8.88]	10.0	mg/kg dry	1	EB52307	02/24/05	02/24/05	EPA 8015M	J
Diesel Range Organics >C12-C35	259	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	259	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		86.2 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		104 %	70-130		"	"	"	"	

Environmental Lab of Texas

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Page 2 of 7

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynegy Monument
Project Number: 1-0101
Project Manager: Cindy Crain

Fax: (432) 687-0456

Reported:
02/25/05 11:07

General Chemistry Parameters by EPA / Standard Methods
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
SF-7 (5B24003-01) Soil									
Chloride	100	5.00	mg/kg	10	EB52503	02/24/05	02/24/05	EPA 300.0	
% Moisture	4.5	0.1	%	1	EB52504	02/24/05	02/25/05	% calculation	
SF-8 (5B24003-02) Soil									
Chloride	398	20.0	mg/kg	40	EB52503	02/24/05	02/24/05	EPA 300.0	
% Moisture	22.1	0.1	%	1	EB52504	02/24/05	02/25/05	% calculation	
SF-9 (5B24003-03) Soil									
Chloride	92.2	5.00	mg/kg	10	EB52503	02/24/05	02/24/05	EPA 300.0	
% Moisture	16.5	0.1	%	1	EB52504	02/24/05	02/25/05	% calculation	
Spoil (5B24003-04) Soil									
Chloride	740	20.0	mg/kg	40	EB52503	02/24/05	02/24/05	EPA 300.0	
% Moisture	12.7	0.1	%	1	EB52504	02/24/05	02/25/05	% calculation	

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynegey Monument
Project Number: 1-0101
Project Manager: Cindy Crain

Fax: (432) 687-0456

Reported:
02/25/05 11:07

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch EB52307 - Solvent Extraction (GC)

Blank (EB52307-BLK1)

Prepared: 02/23/05 Analyzed: 02/24/05

Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet							
Diesel Range Organics >C12-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	44.9		mg/kg	50.0		89.8	70-130			
Surrogate: 1-Chlorooctadecane	41.1		"	50.0		82.2	70-130			

LCS (EB52307-BS1)

Prepared: 02/23/05 Analyzed: 02/24/05

Gasoline Range Organics C6-C12	453	10.0	mg/kg wet	500		90.6	75-125			
Diesel Range Organics >C12-C35	460	10.0	"	500		92.0	75-125			
Total Hydrocarbon C6-C35	913	10.0	"	1000		91.3	75-125			
Surrogate: 1-Chlorooctane	46.7		mg/kg	50.0		93.4	70-130			
Surrogate: 1-Chlorooctadecane	36.7		"	50.0		73.4	70-130			

Calibration Check (EB52307-CCV1)

Prepared: 02/23/05 Analyzed: 02/24/05

Gasoline Range Organics C6-C12	509		mg/kg	500		102	80-120			
Diesel Range Organics >C12-C35	565		"	500		113	80-120			
Total Hydrocarbon C6-C35	1070		"	1000		107	80-120			
Surrogate: 1-Chlorooctane	48.6		"	50.0		97.2	70-130			
Surrogate: 1-Chlorooctadecane	47.8		"	50.0		95.6	70-130			

Matrix Spike (EB52307-MS1)

Source: 5B23007-03

Prepared: 02/23/05 Analyzed: 02/24/05

Gasoline Range Organics C6-C12	530	10.0	mg/kg dry	602	ND	88.0	75-125			
Diesel Range Organics >C12-C35	579	10.0	"	602	ND	96.2	75-125			
Total Hydrocarbon C6-C35	1110	10.0	"	1200	ND	92.5	75-125			
Surrogate: 1-Chlorooctane	37.3		mg/kg	50.0		74.6	70-130			
Surrogate: 1-Chlorooctadecane	39.3		"	50.0		78.6	70-130			

Matrix Spike Dup (EB52307-MSD1)

Source: 5B23007-03

Prepared: 02/23/05 Analyzed: 02/24/05

Gasoline Range Organics C6-C12	516	10.0	mg/kg dry	602	ND	85.7	75-125	2.68	20	
Diesel Range Organics >C12-C35	600	10.0	"	602	ND	99.7	75-125	3.56	20	
Total Hydrocarbon C6-C35	1120	10.0	"	1200	ND	93.3	75-125	0.897	20	
Surrogate: 1-Chlorooctane	41.4		mg/kg	50.0		82.8	70-130			
Surrogate: 1-Chlorooctadecane	38.0		"	50.0		76.0	70-130			

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynege Monument
Project Number: 1-0101
Project Manager: Cindy Crain

Fax: (432) 687-0456

Reported:
02/25/05 11:07

General Chemistry Parameters by EPA / Standard Methods - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch EB52503 - Water Extraction

Blank (EB52503-BLK1) Prepared & Analyzed: 02/24/05

Chloride	ND	0.500	mg/kg							
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Blank (EB52503-BLK2) Prepared & Analyzed: 02/24/05

Chloride	ND	0.500	mg/kg							
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LCS (EB52503-BS1) Prepared & Analyzed: 02/24/05

Chloride	10.3		mg/L	10.0		103	80-120			
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LCS (EB52503-BS2) Prepared & Analyzed: 02/24/05

Chloride	10.4		mg/L	10.0		104	80-120			
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Calibration Check (EB52503-CCV1) Prepared & Analyzed: 02/24/05

Chloride	10.4		mg/L	10.0		104	80-120			
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Calibration Check (EB52503-CCV2) Prepared & Analyzed: 02/24/05

Chloride	10.4		mg/L	10.0		104	80-120			
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Duplicate (EB52503-DUP1) Source: 5B22006-01 Prepared & Analyzed: 02/24/05

Chloride	35.3	5.00	mg/kg		42.2			17.8	20	
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Duplicate (EB52503-DUP2) Source: 5B24002-02 Prepared & Analyzed: 02/24/05

Chloride	17.2	5.00	mg/kg		17.1			0.583	20	
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Batch EB52504 - General Preparation (Prep)

Blank (EB52504-BLK1) Prepared: 02/24/05 Analyzed: 02/25/05

% Moisture	ND	0.1	%							
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Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynegey Monument
Project Number: 1-0101
Project Manager: Cindy Crain

Fax: (432) 687-0456
Reported:
02/25/05 11:07

General Chemistry Parameters by EPA / Standard Methods - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch EB52504 - General Preparation (Prep)

Duplicate (EB52504-DUP1)

Source: 5B24002-01

Prepared: 02/24/05 Analyzed: 02/25/05

% Moisture	13.0	0.1	%		12.3			5.53	20	
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Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynege Monument
Project Number: 1-0101
Project Manager: Cindy Crain

Fax: (432) 687-0456

Reported:
02/25/05 11:07

Notes and Definitions

J Detected but below the Reporting Limit; therefore, result is an estimated concentration (CLP J-Flag).
DET Analyte DETECTED
ND Analyte NOT DETECTED at or above the reporting limit
NR Not Reported
dry Sample results reported on a dry weight basis
RPD Relative Percent Difference
LCS Laboratory Control Spike
MS Matrix Spike
Dup Duplicate

Report Approved By: Raland K. Tuttle Date: 2-25-05

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer

Jeanne Mc Murrey, Inorg. Tech Director
James L. Hawkins, Chemist/Geologist
Sandra Sanchez, Lab Tech.

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If you have received this material in error, please notify us immediately at 432-563-1800.

Environmental Lab of Texas
Variance / Corrective Action Report – Sample Log-In

Client: Larson & Assoc.

Date/Time: 2/24/05 9:35

Order #: SB24003

Initials: CK

Sample Receipt Checklist

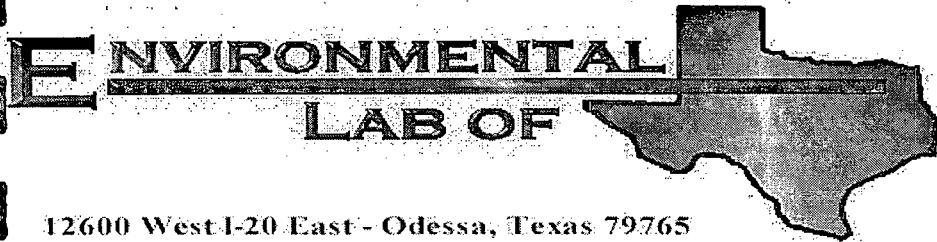
Temperature of container/cooler?	<u>Yes</u>	No	<u>O.B</u> C
Shipping container/cooler in good condition?	<u>Yes</u>	No	
Custody Seals intact on shipping container/cooler?	Yes	No	<u>Not present</u>
Custody Seals intact on sample bottles?	Yes	No	<u>Not present</u>
Chain of custody present?	<u>Yes</u>	No	
Sample Instructions complete on Chain of Custody?	<u>Yes</u>	No	
Chain of Custody signed when relinquished and received?	<u>Yes</u>	No	
Chain of custody agrees with sample label(s) <u>no label</u>	<u>Yes</u>	No	<u>written on lid</u>
Container labels legible and intact?	<u>Yes</u>	No	<u>n/a</u>
Sample Matrix and properties same as on chain of custody?	<u>Yes</u>	No	
Samples in proper container/bottle?	<u>Yes</u>	No	
Samples properly preserved?	<u>Yes</u>	No	
Sample bottles intact?	<u>Yes</u>	No	
Preservations documented on Chain of Custody?	<u>Yes</u>	No	
Containers documented on Chain of Custody?	<u>Yes</u>	No	
Sufficient sample amount for indicated test?	<u>Yes</u>	No	
All samples received within sufficient hold time?	<u>Yes</u>	No	
VOC samples have zero headspace?	<u>Yes</u>	No	Not Applicable

Other observations:

Variance Documentation:

Contact Person: - _____ Date/Time: _____ Contacted by: _____
 Regarding: _____

Corrective Action Taken:



Analytical Report

Prepared for:

Cindy Crain

Larson & Associates, Inc.

P.O. Box 50685

Midland, TX 79710

Project: Dynegy Monument Storage Area

Project Number: 1-0101

Location: None Given

Lab Order Number: 5E18009

Report Date: 05/23/05

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynegey Monument Storage Area
Project Number: 1-0101
Project Manager: Cindy Crain

Fax: (432) 687-0456
Reported:
05/23/05 09:51

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Spoil	5E18009-01	Soil	05/17/05 15:36	05/18/05 09:42

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynegey Monument Storage Area
Project Number: 1-0101
Project Manager: Cindy Crain

Fax: (432) 687-0456

Reported:
05/23/05 09:51

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Spoil (5E18009-01) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EE51809	05/18/05	05/20/05	EPA 8015M	
Diesel Range Organics >C12-C35	68.3	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	68.3	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		93.4 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		80.8 %	70-130		"	"	"	"	

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynege Monument Storage Area
Project Number: 1-0101
Project Manager: Cindy Crain

Fax: (432) 687-0456

Reported:
05/23/05 09:51

General Chemistry Parameters by EPA / Standard Methods
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Spoil (5E18009-01) Soil									
Chloride	314	20.0	mg/kg	40	EE52004	05/19/05	05/19/05	EPA 300.0	
% Moisture	14.0	0.1	%	1	EE51817	05/18/05	05/19/05	% calculation	

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynege Monument Storage Area
Project Number: 1-0101
Project Manager: Cindy Crain

Fax: (432) 687-0456

Reported:
05/23/05 09:51

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch EE51809 - Solvent Extraction (GC)

Blank (EE51809-BLK1)

Prepared: 05/18/05 Analyzed: 05/20/05

Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet							
Diesel Range Organics >C12-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	41.2		mg/kg	50.0		82.4	70-130			
Surrogate: 1-Chlorooctadecane	37.9		"	50.0		75.8	70-130			

LCS (EE51809-BS1)

Prepared: 05/18/05 Analyzed: 05/20/05

Gasoline Range Organics C6-C12	438	10.0	mg/kg wet	500		87.6	75-125			
Diesel Range Organics >C12-C35	493	10.0	"	500		98.6	75-125			
Total Hydrocarbon C6-C35	931	10.0	"	1000		93.1	75-125			
Surrogate: 1-Chlorooctane	42.7		mg/kg	50.0		85.4	70-130			
Surrogate: 1-Chlorooctadecane	35.2		"	50.0		70.4	70-130			

Calibration Check (EE51809-CCV1)

Prepared: 05/18/05 Analyzed: 05/20/05

Gasoline Range Organics C6-C12	483		mg/kg	500		96.6	80-120			
Diesel Range Organics >C12-C35	506		"	500		101	80-120			
Total Hydrocarbon C6-C35	989		"	1000		98.9	80-120			
Surrogate: 1-Chlorooctane	54.2		"	50.0		108	70-130			
Surrogate: 1-Chlorooctadecane	42.6		"	50.0		85.2	70-130			

Matrix Spike (EE51809-MS1)

Source: 5E18004-22

Prepared: 05/18/05 Analyzed: 05/20/05

Gasoline Range Organics C6-C12	583	10.0	mg/kg dry	543	34.6	101	75-125			
Diesel Range Organics >C12-C35	734	10.0	"	543	141	109	75-125			
Total Hydrocarbon C6-C35	1320	10.0	"	1090	176	105	75-125			
Surrogate: 1-Chlorooctane	47.5		mg/kg	50.0		95.0	70-130			
Surrogate: 1-Chlorooctadecane	36.3		"	50.0		72.6	70-130			

Matrix Spike Dup (EE51809-MSD1)

Source: 5E18004-22

Prepared: 05/18/05 Analyzed: 05/20/05

Gasoline Range Organics C6-C12	569	10.0	mg/kg dry	543	34.6	98.4	75-125	2.43	20	
Diesel Range Organics >C12-C35	736	10.0	"	543	141	110	75-125	0.272	20	
Total Hydrocarbon C6-C35	1300	10.0	"	1090	176	103	75-125	1.53	20	
Surrogate: 1-Chlorooctane	45.7		mg/kg	50.0		91.4	70-130			
Surrogate: 1-Chlorooctadecane	36.1		"	50.0		72.2	70-130			

Environmental Lab of Texas

The results in this report apply to the samples analyzed in accordance with the samples received in the laboratory. This analytical report must be reproduced in its entirety, with written approval of Environmental Lab of Texas.

Page 4 of 6

Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynege Monument Storage Area
Project Number: 1-0101
Project Manager: Cindy Crain

Fax: (432) 687-0456

Reported:
05/23/05 09:51

General Chemistry Parameters by EPA / Standard Methods - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	--------------------	-------	----------------	------------------	------	----------------	-----	--------------	-------

Batch EE51817 - General Preparation (Prep)

Blank (EE51817-BLK1)

Prepared & Analyzed: 05/18/05

% Moisture	ND	0.1	%
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Duplicate (EE51817-DUP1)

Source: 5E17008-01

Prepared & Analyzed: 05/18/05

% Moisture	9.4	0.1	%	9.1	3.24	20
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Batch EE52004 - Water Extraction

Blank (EE52004-BLK1)

Prepared & Analyzed: 05/19/05

Chloride	ND	0.500	mg/kg
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LCS (EE52004-BS1)

Prepared & Analyzed: 05/19/05

Chloride	10.4	mg/L	10.0	104	80-120
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Calibration Check (EE52004-CCV1)

Prepared & Analyzed: 05/19/05

Chloride	10.4	mg/L	10.0	104	80-120
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Duplicate (EE52004-DUP1)

Source: 5E18013-02

Prepared & Analyzed: 05/19/05

Chloride	633	25.0	mg/kg	655	3.42	20
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Larson & Associates, Inc.
P.O. Box 50685
Midland TX, 79710

Project: Dynegey Monument Storage Area
Project Number: 1-0101
Project Manager: Cindy Crain

Fax: (432) 687-0456

Reported:
05/23/05 09:51

Notes and Definitions

DET Analyte DETECTED
ND Analyte NOT DETECTED at or above the reporting limit
NR Not Reported
dry Sample results reported on a dry weight basis
RPD Relative Percent Difference
LCS Laboratory Control Spike
MS Matrix Spike
Dup Duplicate

Report Approved By: Raland K Tuttle Date: 5-23-05

Raland K. Tuttle, Lab Manager

Celey D. Keene, Lab Director, Org. Tech Director

Peggy Allen, QA Officer

Jeanne Mc Murrey, Inorg. Tech Director

James L. Hawkins, Chemist/Geologist

Sandra Sanchez, Lab Tech.

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Environmental Lab of Texas

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Page 6 of 6

Environmental Lab of Texas

Variance / Corrective Action Report – Sample Log-In

Client: LARSON

Date/Time: 5/18/05 10:00

Order #: SE18009

Initials: CR

Sample Receipt Checklist

Temperature of container/cooler?	Yes	No	6.0 C
Shipping container/cooler in good condition?	<input checked="" type="checkbox"/> Yes	No	
Custody Seals intact on shipping container/cooler?	Yes	No	Not present
Custody Seals intact on sample bottles?	Yes	No	Not present
Chain of custody present?	<input checked="" type="checkbox"/> Yes	No	
Sample Instructions complete on Chain of Custody?	<input checked="" type="checkbox"/> Yes	No	
Chain of Custody signed when relinquished and received?	<input checked="" type="checkbox"/> Yes	No	
Chain of custody agrees with sample label(s)	Yes	No	none
Container labels legible and intact?	Yes	No	n/a
Sample Matrix and properties same as on chain of custody?	<input checked="" type="checkbox"/> Yes	No	
Samples in proper container/bottle?	<input checked="" type="checkbox"/> Yes	No	
Samples properly preserved?	<input checked="" type="checkbox"/> Yes	No	
Sample bottles intact?	<input checked="" type="checkbox"/> Yes	No	
Preservations documented on Chain of Custody?	<input checked="" type="checkbox"/> Yes	No	
Containers documented on Chain of Custody?	<input checked="" type="checkbox"/> Yes	No	
Sufficient sample amount for indicated test?	<input checked="" type="checkbox"/> Yes	No	
All samples received within sufficient hold time?	<input checked="" type="checkbox"/> Yes	No	
VOC samples have zero headspace?	<input checked="" type="checkbox"/> Yes	No	Not Applicable

Other observations:

Should be 4.0°C - was recorded at 6.0°C.

No label - written on lid.

Variance Documentation:

Contact Person: - _____ Date/Time: _____ Contacted by: _____

Regarding: _____

Corrective Action Taken:

