

SAN JUAN DIVISION

January 30, 1998

PNM – 36

Certified: P 103 693 179

Bill Olson New Mexico Oil Conservation Division 2040 S. Pacheco Santa Fe, NM 85704

RE: Hampton 4M - Groundwater Contamination Unit Letter N, Section 13, Township 30N, Range 11W

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Dear Mr. Olson

As requested in your November 24, 1997 letter, the following is a status report on the soil/groundwater investigation and remediation activities that have been conducted at the Hampton 4M gas production location. This report addresses the activity up gradient of PNM's former dehydrator pit as detailed in Burlington Resources' Soil and Groundwater Investigation Work Plan dated September 19, 1997. Details on the initial investigation work were submitted to you on July 30, 1997 and will not be repeated in this report. A site diagram showing the location of the discussed monitoring wells and soil excavation is included in Attachment #1.

Up Gradient Monitoring Well Information

Archaeological clearance and landowner approval was-obtained on October 17, 1997 to drill a monitoring well off the existing well pad. On October 29, 1997, Philip Services Corporation drilled and completed an up gradient monitoring well located approximately 50 feet south of the southeast corner of the production location. The geologic logs and well completion diagram for this well (MW #1) are included in Attachment #2. Analytical results of a water sample collected on October 30, 1997 and again on January 12, 1998 showed the water to be clean (below regulatory limits). The laboratory results are included in Attachment #3.

On Site Source Investigation/Remediation

As discussed in the Work Plan, the source investigation work in the southeast corner of location required the use of a D-8 dozer due to the hard layers of sandstone. On December 3, 1997, the dozer began by ripping and pushing non-impacted soil to the south side of location. After approximately four feet of clean soil had been removed to the south, a small area of impacted soils was uncovered in the former location of the produced hydrocarbon storage tanks. A screen of this soil with a PID registered a reading of 900 parts per million (ppm). At that time, the dozer began ripping and pushing the soil to the north side of the excavation.

Due to the fact that a dozer was being used to excavate the contaminated soils, non-impacted soils could not easily be segregated from the contaminated soils. The dozer, unlike a backhoe, could not pick and choose the soils to be stockpiled. For this reason, soils stockpiled to the north of the excavation included a large percentage of clean soil mixed with a smaller percentage of contaminated soils. The entire stockpile was treated as contaminated soil.



Excavation work continued on December 4, 1997. At approximately the 14-foot level, all four walls and the bottom of the excavation were sampled for heated headspace PID readings. All except the west wall had readings greater than the NMOCD's pit closure guideline of 100 ppm. The excavation work resumed and at approximately the 15-foot level, samples were again collected. The readings at this depth were all less than 100 ppm and a composite showed a reading of 44 ppm on the PID. The PID readings for both depths are detailed in Table 1.

	Hampton 4M Excavation Heated Headspace PID Readings (ppm)									
Depth (ft)	South Wall	West Wall	North Wall	East Wall	Bottom					
14	526	51.0	273	388	195					
15	5.4	51.0	49.0	15.0	38.0					

Table 1

At this time, the dozer work was discontinued. The final excavation was approximately 60 feet long, 30 feet wide and 15 feet deep. Due to the need for the dozer to ramp into the excavation, additional dirt had to be moved. Again, this additional dirt could not be segregated from the impacted soil and was treated as contaminated.

Soil samples were collected from the excavation for laboratory analysis on December 4, 1997. The samples were sent to Onsite Laboratory and analyzed for Benzene, Toluene, Ethlybenzene and Total Xylenes (BTEX) by USEPA Method 8020 and Total Petroleum Hydrocarbons (TPH) by USEPA Method 8015 modified for gasoline and diesel range hydrocarbons. The results were all less than NMOCD cleanup standards for soils and are included in Attachment #3.

After the excavation was left open for a few hours, groundwater seeped into the excavation. No free phase hydrocarbons were observed. Over the next week, approximately 100 barrels of water were removed from the excavation and properly disposed. Thirty barrels were removed on December 5 and seventy barrels were removed on December 11, 1997. Due to the soil disturbance from the dozer work, it was felt a water sample would not be representative of actual groundwater. For this reason, no samples of the water were collected from the excavation.

Waste Disposal

The impacted soils that were stockpiled to the north of the excavation were transported to nearby Burlington Resources locations and landfarmed. Impacted soils, totaling approximately 1000 cubic yards, were trucked to the Nye SRC #14, Nye SRC #4 and Hampton #5 well site locations. These landfarms will be periodically disked to promote natural bio-degradation until TPH and BTEX levels are less than NMOCD cleanup standards.

The water that was removed from the excavation was disposed in Burlington Resources' McGrath SWD located in Section 34 – T30N – R12W, San Juan County, New Mexico.

Additional Monitoring Wells

As requested in your November 24, 1997 letter, an additional monitoring well was installed midway between MW-4 and TPW-3. The new well, identified as MW-8, was drilled and completed on December 11, 1997 by Philip Services Corporation. The geologic logs and well completion diagrams are included in Attachment #2. Analytical results of a water sample collected on January 12, 1998 showed the water was high in dissolved BTEX components (total BTEX of 33,801 ppb). The laboratory results are included in Attachment #3.

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The excavation has been left open to promote remediation; therefore, the required source monitoring well has not yet been installed. Once the excavation is backfilled, the monitoring well will be installed in the source area near the former location of temporary monitor well TPW-7.

Existing Monitoring Well Sampling

Two existing monitoring wells (MW-3 and MW-4) that are located up gradient of PNM's former dehydrator discharge pit were sampled on January 12, 1998. The water from MW-3, which is located near the west edge of location, continued to be non-detect for BTEX components. The water from MW-4, located immediately down gradient of the excavation, still had high BTEX, but the level dropped to less than half of the May 1, 1997 sample. This reduction in contaminant levels may be directly related to the remediation efforts (source removal) that have taken place to date. Table 2 shows the results of the past sampling of these two monitoring wells.

Groundwater Sampling Summary BTEX (ppb)							
	1/31/97	5/1/97	1/12/98				
MW-3	ND	ND	ND				
MW-4	2651	3470	1361				

Table 2

PNM had all the monitoring wells surveyed for location and groundwater elevation on January 12, 1998. The direction and magnitude of the hydraulic gradient, using this most recent data, has not yet been determined. Burlington and/or PNM will provide you with a map showing the details of the recent surveys when it becomes available.

Conclusions

The water quality of the up gradient well (MW#1) indicates that groundwater contamination is not coming from an off site source. The quality of the water from the monitoring well, located approximately 50 feet up gradient of the location, has been tested twice and is within water quality standards.

The recent excavation work done at the Hampton 4M confirmed a second source of groundwater contamination in the southeast corner of the location. The dozer work in the southeast corner of the location revealed hydrocarbon impacted soils to a depth of 15 feet, which is the approximate depth to groundwater. Source removal has been completed. The contaminated soils in this area of Burlington

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Resources' former tank battery have all been excavated and taken off location. The source removal appears to be effective as shown by the decrease in dissolved BTEX in monitoring well MW-4.

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No evidence has been found indicating that Burlington Resources' operations in the southeast corner of the location have contributed to the free phase hydrocarbons near PNM's former dehydrator pit. High concentrations of dissolved phase hydrocarbons have been found near Burlington's operations, but no free phase. Free phase hydrocarbons have not been found in any of the temporary monitoring wells or completed monitoring wells in Burlington's area of operation. The excavation, which has been open to the groundwater for over a month, has also not shown any evidence of free phase hydrocarbons.

Plan of Action

To address the groundwater contamination associated with Burlington Resources' operations in the southeast corner of the location, plans are to leave the excavation open for a period of time while we monitor the contaminant levels in the down gradient wells. Both MW-4 and the recently drilled MW-8 are located to allow good monitoring immediately down gradient of Burlington's source removal area.

Once a downward trend of contaminant levels is established in the two wells directly down gradient of Burlington's source removal area, the excavation will be backfilled with clean soils. A monitoring well will then be installed in the source area. Water quality from the source well and the down gradient wells will be monitored periodically to show improvement in water quality.

The unique characteristics of the Hampton 4M location pose challenges of site characterization and remediation. Burlington Resources feels that continued groundwater monitoring will show a decrease in contaminant levels up gradient of PNM's former dehydrator pit as a result of the source removal in the southeast corner of the location. If you have questions or additional information is needed, please contact me at (505) 326-9841.

Sincerely,

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Ed Hasely Sr. Staff Environmental Representative

Enclosures: Attachment #1: Hampton 4M Site Diagram Attachment #2: Geologic Logs and Well Completion Diagrams Attachment #3: Laboratory Results

cc: Denny Foust - NMOCD Aztec Johnny Ellis - BR Ken Raybon - BR Keith Baker - BR Denver Bearden - PNM Farmington Maurene Gannon - PNM Albuquerque Hampton 4M File



ATTACHMENT #1

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SITE DIAGRAM

Hampton 4M Site Diagram



ATTACHMENT #2

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GEOLOGIC LOGS AND WELL COMPLETION DIAGRAMS

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formington	. New M	lexico 874	401		Project	Name	PNM	HAMP	TON	4M
(505) 326-22	62 FAX	(505) 326-	2388		Project	Number	18	839	Pho	cise 6000
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Comments:

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Gue 38.85' BGS. Will deill 5 more & install well.

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RECORD OF SUBSURFACE EXP	LORATION
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CM CHANCE

K Padilla

Date/Time Started 10/24/47 Date/Time Completed 10/29/47 . 🖎

PHILIP SERVICES CORP. 00 Monroe Road Farmington, New Mexico 87401 (505) 326-2262 FAX (505) 326-2388

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Elevation

Logged By

Drilled By

Borehole Location GWL Depth

	Page _C.	
Project Name F	NM HAMPTON 4M	
Project Number	18839 Phase	6000
Project Location	HAMPTON 4M	
Well Logged By	CM CHANCE	
Personnei On-Sile	D CHARLEY	
Contractors On-Site		

Weil #

Borehole # BH-3

mw

Client Personnei On-Site

Drilling Method 4 1/4 ID HSA

Air Monitoring Method PID

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Comments:

MONITOR WELL INSTALLATION FORM

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Philip Servic	es Corp.
4000 Monroe Rd.	
Formington, NM	87401
(505) 326-2262	FAX (505) 326-2388

Elevation			
Well Location			
GWL Depth	38.85'	ß	65
Installed By	K PADI	u٨	· · · ·

		Page	of	
Project Name	PNM H	AMPTON 4M		
Project Numb	18839		Phase	6000
Sile Location	HAMPI	ON 4M		
On-Site Geolo	gist	C CHANCE		
Personnel On-	Site	D CHARLEY		
Contractor O	n.Sita			

Client Personnel On-Site

Date/Time Started 10/39/97 Date/Time Complete 10/39/17



600704

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MW-

Borehole # 7

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	CE EXPLORATION				Borehole Well#	BH-6 MW8		•
Monroe Road Ington, New Mexico 87401 (505) 326-2262 FAX (505) 328-2388		Project N Project N Project Li	ame umber postion	PNM HAMF 18929 HAMPTON	Page PTON 4 Phat I 4M	im im se <u>1001</u>		
Elevation Borehole Location Center of GWL Depth CM CHANCE Drilled By K Padilla	<u> Sн </u>	Well Log Personne Contract Client Pe	ged By al On-Site ors On-Site rsonnel Or		HANC	E V. P. Acchulary Kolvin, M. Ga.		
Date/Time Started <u>」み/ハ</u> Date/Time Completed <u>」ンハハ</u>	<u>97</u>	Drilling N Air Monit	lethod Ioring Meth	4 1/4 ID HS	<u>64</u>			
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ATTACHMENT #3

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LABORATORY RESULTS



ANALYTICAL REPORT

Attn:	Uenver L	seargen		Date:	5-Nov-97
Company:	PNM Ga	s Services		COC No.:	7080
Address:	6 0 3 W.	Elm		Sample No.:	16700
City, State	: Farming	ton, NM 87401		Job No.:	2-1000
Project Nar	ne:	PNM Gas Serv	ic es - Hemptom 4M	1	
Project Loc	ation:	9710301030;	MW-1		
Sampled by	y:	MS	Date:	30-Oct-97 Time:	10:30
Analyzed b	y:	HR	Date:	4-Nov-97	
Sample Ma	trix:	Liauid			

Burlingfort's weil -

arameter	Results as Received	Unit of Measure	Limit of Quantitation	Unit of Measure
Benzene	2.4	ug/L	_ 0.2	ug/L
Toluene	2.3	ug/L	- 0.2	ug/L
Ethylbenzene	ND	u g/L	0.2	ug/L
m,p-Xylene	1.1	ug/L	0.2	ug/L
o-Xylene	ND	ug/L	0.2	ug/L
τοτλ	5.8	ug/L		

ND - Not Detected at Limit of Quantitation

Method - SW-846 EPA Method 8020A Aromatic Volatile Organics by Gas Chromatography

Approved By: Date:



LAB: (505) 325-1556

QUALITY ASSURANCE REPORT for EPA Method 8020

Date Analyzed: 4-Nov-97

OFF: (505) 325-5667

Internal QC No.:	0559-STD
Surrogate QC No.:	0556-STD
Reference Standard QC No.:	0529/30-QC

Method Blank		
		Unit of
Parameter	Result	Measure
Average Amount of All Analytes in Blank	< 0.2	ppb

10

Calibration Check

	Unit of	True	Analyzed		
Parameter	Meesure	Valuo	Value	RPD	Limit
Benzene	ppb	20.0	20.7	4	15%
Toluene	ppb	20.0	21.3	6	15%
Ethylbenzene	ppb	20.0	21.2	6	15%
m,p-Xylene	ppb	40.0	40.3	1	15%
o-Xylene	ppb	20.0 -	21.1	5	15%

Matrix Spike

	1- Percent	2 - Percent			
Parameter	Recovered	Recovered	Limit	RPD	Limit
Benzene	92	86	(39-150)	3	20%
Toluene	96	87	(46-148)	3	20%
Ethylbenzene	97	92	(32-160)	4	20%
m,p-Xylene	94	88	(35-145)	4	20%
o-Xylene	95	92	(35-145)	2	20%

Surrogate Recoveries

	S1	S 2		S1	S2
	Percent	Percent		Percent	Percent
Laboratory Identification	Recovered	Recovered	Laboratory Identification	Recovered	Recovered
Limit Percent Recovered	(70-130)		Limit Percent Recovered	(70-130)	
16699-7080	95				
16700-7080	95				
					(ne)
					11/5/97
S1: Flourobenzen					11/5/97

AN-2UAN 26 '98 05:13PM PNM TE

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OFF: (505) 325-5667



LAB: (505) 325-1556

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ANALYTICAL REPORT

Attn:	Denver Bei	urden		Date:	23-Jan-98
Company:	PNM Gas 5	Services		COC No.:	7085
Address:	603 W. Eli	m		Sample No.:	17304
City, State:	Farmington	b, NM 87401		Job No.:	2-1000
Project Nam Project Local Sampled by Analyzed by Sample Mat	ne: stion: r: y: urbx:	PNM Gas Services 9801121030; Mi MS/MG/RD/RE DC Liquid	- Hampton 4M V-1 Date: Date:	12-Jan-88 Timo: 21-jan-98	10:30

Parameter		Results as Received	Unit of Measure	Limit of Quantization	Unit of Measure
Benzene		4.3	ugl	0.2	ug/L
Toluene		3.3	ug/L	0.2	ug/L
Ethylbanzene		0.2	ug/L	0.2	ug/L
m,p-Xviene		0.7	url	- 0.2	ug/L
o-Xylene		0.3	ug/L	0.2	ug/L
	TOTAL	8.8	ug/L		•

ND - Not Detected at Limit of Quantitation

Method - SW-846 EPA Method 8030A Aromatic Volatile Organics by Gas Chromotography

Loproved By Date

P.O. BOX 2606 • FARMINGTON, NM 87499 - TECHNOLOGY BLENDING INDUSTRY WITH THE ENVIRONMENT - N-26JAN 26 795 05:15PM PNM TE 7 H.

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OFF: (505) 325-5667



LAB: (505) 325-1556

13:00

ANALYTICAL REPORT

Date:	23-Jan-98
COC No.:	7086
Sample No.:	17309
Job No.:	2-1000
•	
	Date: COC No.: Sample No.: Job No.;

Project Name:	PNM Gas Service	PNM Gas Services • Hampton 4M					
Project Location:	9801121300; N	6W-8					
Sampled by:	MS/MG/RD/RB	Date:	12-Jan-98 Time:				
Analyzed by:	DC	Date:	21-jzn-98				
Sample Matrix:	· Liquid	•					

Paramutar	· Recuts as Received	Unit of Measure	Limit of Quantitation	Unit of Monsure
Enzene	6410	ag/L	20	10/L
Toluene	17301	us/L	20	vs/L
Ethyibenzene	693	ug/L	20	vg/L
m,p-Xviene	7612	ug/L	- 20	س/۱.
o-Xylene	1785	ug/L	20	ur/L
	· · /		1.	
TOTAL	33801	u g/L .		

ND - Not Detected at Limit of Quantization

Method - SW-846 EPA Method BO20A Aromana Volatile Organics by Gas Chromatography

Approved By: Date

P.O. BOX 2606 • FARMINGTON, NM 87499 - Technology Blending Industry with the Environment - OFF: (505) 323-5667



LAB: (505) 325-1556

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688883

QUALITY ASSURANCE REPORT for EPA Method 8020

Date Analyzed: 21-Jan-98

Internal QC No.: 0588-STD Surrogate QC No.: 0567-STD Reference Standard QC No.: 0523/30-QC

Method Blank

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Perametar	Result	Afeestre	
Average Amount of All Analytes in Blank	· <0.2	790	!
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Calibration Check

	Unit of	Tae	Anslyzed		
Parameter	Mensure	Valere	Value	RPD	Limit
••				·	
Benzene	ppb '	30.0	30,6	2	15% ·
Toluene	ppb	30.0	30.8	3	15%
Ethylbenzene	ppb	30.0	31.4	5	15%
p-Xylene	ppb	60.0	59.7	0	15%
<u> Xylene</u>	ppb	30.0	31.1	4	15%

Matitx Spike

	1- Parcent	· 2 · Percent			
Paramoter	Recovered	Recovered	Linutz	RPO	Limit
		· ·			
Benzene	102	92	(39-150)	2	20%
Toluene	108	105	(46-148)	2	20%
Ethylbenzene	108	105	(32-160)	3	20%
m,p-Xylene	104	102	(35-145)	3	20%
o-Xylene	110	107 ·	(35-145)	2	20%

Surrogate Recoveries

	\$1	\$2	•	\$1	\$2
•	Perwent	Percent		Percent	Percent
Laboratory Identification	Recovered	Recovered	Leboratory Identification	Recovered	Recovered
Limit Percent Recovered	(70-130)	•	Limit Percent Recovered	(70-130)	
17304-7086	101	 	17310-7086	100	
17305-7085	102				1
17306-7085	100		·		
17307-7086	100				
7308-7086	101			- JR	62.
7309-7085	101			1/22/PK	123/98

S1: Flourobenzone

P.O. BOX 2606 • FARMINGTON, NM 87499

- TECHNOLOGY BLENDING INDUSTRY WITH THE ENVIRONMENT -



OFF: (505) 325-5667

LAB: (505) 325-1556

ANALYTICAL REPORT

Attn:Scott PopeCompany:Philip EnvironmentalAddress:4000 Monroe RoadCity, State:Farmington, NM 87401

Date: 12-Dec-97 COC No.: G3687 Sample No.: 17042 Job No.: 2-1000

Project Name:	Burlington Resource	es - Hampton 4M		
Project Location:	B.R.O.G. 01			
Sampled by:	D8	Date:	4-Dec-97 Time:	13:00
Analyzed by:	DC/HR	GRO Date:	9-Dec-97	
Sample Matrix:	Soil	DRO Date:	11-Dec-97	

Laboratory Analysis

Parameter	Results as Received	Unit of Measure	Limit of Quantitation	Unit of Measure
Gasoline Range Organics (C5 - C9)	ND	mg kg	0.5	mg/kg
Diesel Range Organics (C10 - C28)	ND	me ke	5	mg/kg

ND - Not Detected at Limit of Quantitation

.

Quality Assurance Report

GRO QC No.: 0554-STD DRO QC No.: 0555-STD

Continuing Calibration Verification

Parameter	Method Blank	Unit of Measure	True Value	Analyzed Value	RPD	RPD Limit
Gasoline Range (CS - C9)	ND	nah	1.801	1 869	37	15%
Diesel Range (C10 - C28)	ND	ppm	200	195	2.4	15%

Matrix Spike

	1- Percent	2 - Percent			RPD
Parameter	Recovered	Recovered	Limit	RPD	Limit
Gasoline Range (CS-C9)	93	92	(80-120)	0	20%
Diesel Range (C10-C28)	95	98	(75-125)	3	. 20%

Method: SW-846 EPA Method 8015A mod. - Nonhalogenated Volatile Hydrocarbons by Gas Chromatography

Approved by: Date:



PFF: (505) 325-5667

Sample Matrix:

LAB: (505) 325-1556

ANALYTICAL REPORT

Attn:	Scott Po	pe '			Date:	10-Dec-97
Company:	Philip En	vironmen	tal		COC No.:	G3687
Address:	4000 M	onroe Roa	nd		Sample No.:	17042
City, State:	: Farmingt	on, NM 8	37401		Job No.:	2-1000
Project Nar	ne:	Burlin	gton Resou	rces - Hampton 4M		
Project Loc	ation:	B.R.C).G. 01			
Sampled by	/:	DB		Date:	4-Dec-97 Time:	13:00
Analyzed b	v :	DC	•	Date:	8-Dec-97	

Laboratory Analysis

Parameter	rameter B		Unit of Measure	Limit of Quantitation	Unit of Measure	
Benzene		3	ug/kg	1	ug/kg	
Toluene		6	ug/kg	1	ug/kg	
Ethylbenzene		1	ug/kg	1	ug/kg	
m,p-Xylene		17	ug/kg	1	ug/kg	
o-Xylene		3	ue/ke	1	ug/kg	
	TOTAL	31	ue/ke			

ND - Not Detected at Limit of Quantitation

Soil

Method - SW-846 EPA Method 8020A Aromatic Volatile Organics by Gas Chromatography

Approved by: Date: 12/10/97

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OFF: (505) 325-5667

LAB: (505) 325-1556

QUALITY ASSURANCE REPORT for EPA Method 8020

Date Analyzed: 8-Dec-97

Internal QC No.: 0559-STD Surrogate QC No.: 0556-STD Reference Standard QC No.: 0529/30-QC

Method Blank

Paremotor	. Result	Unit of Measure
Average Amount of All Analytes In Blank	< 1.0	ррв

Calibration Check

		Unit of	True	Analyzed		
Parameter	n	Measure	Value	Value	RPD	Limit
Benzene		ррб	60.0	62.9	5	15%
Toluene		ррь	60.0	64.8	8	15%
Ethylbenzene		ppb	60.0	63.0	5	15%
m,p-Xylene		ppb	120.0	123.2	3	15%
o-Xylene		ppb	60.0	63.0	5	15%

Matrix Spike

· Parameter	1- Percent Recovered	2 - Percent Recovered	Limit	RPD	Limit
Benzene	96	97	(39-150)	1	20%
Toluene	98	99	(46-148)	1	20%
Ethylbenzene	97	98	(32-160)	1	20%
m,p-Xylene	95	95	(35-145)	0	20%
o-Xylene	97	97	(35-145)	1	20%

Surrogate Recoveries

	ST	S2		\$1	\$2
	Percent	Percent		Percent	Percent
Laboratory Identification	Recovered	Recovered	Laboratory Identification	Recovered	Recovered
Limit Percent Recovered	(70-130)		Limit Percent Recovered	(70-130)	
17042-G3687	92				
					· ·
				AIR,	(nc)
	1		1	12/12/97	12/10/97

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S1: Flourobenzene



Chain of Custody Lecord - Nonchemical Samples

210 West Sand Bank Road P.O. Box 230 Columbia, IL 62236-0230

(618) 281-7173 Phone (618) 281-5120 FAX

COC Serial No. G 3687

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Project Name Burning Ton Pits HAMPTINYM					Lab		Name OASTTE				
Project Number 18959 Phase . Task 8000 . 77					Location f			Facm	Acming Ton		
Samplers DAVIA BROW ~					Analysis Type						
Sample Number	Date	Time	Matrix	BTX	TPH				Corr	iments	
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Carrier: Airbill No.										YO 1997	
Shipping and Lab Notes:											