

May 6, 2015

NMOCD District I 1625 N. French Drive Hobbs, New Mexico 88240

SUBJECT: SOIL REMEDIATION WORK PLAN FOR INCIDENT 1RP-4197 STATE "S" BRINE AND WATER STATION (BW-028), LEA COUNTY, NEW MEXICO

Dear Mr. Keyes:

On behalf of Key Energy Services (Key) Souder Miller & Associates (SMA) is pleased to submit the attached Work Plan summarizing the planned soil remediation of the release site located on the State "S" Brine And Water Station (BW-028) in Lea County, New Mexico. The purpose of the work plan is to obtain approval from the New Mexico Oil Conservation Division for remediation of the release that occurred on March 2, 2016.

At the request of Key, SMA responded to assess and delineate the production fluids release associated with the State "S" Brine And Water Station (BW-028) location. The release was initially reported to NMOCD by Key on March 2, 2016 and was a result of a human error. The table below summarizes information regarding the release. Results of the assessment and delineation follow in the attached report.

Table 1: Release information and Site Ranking					
Name	State	"S" Brine a	ınd Water S	Station (BW	/-028)
	Incident Number	API Number	Section, Township, Range		, Range
Location	1RP- 4197	30-025- 33547	SW/NE (Unit D)	Section 15	T 21S, R37 E NMPM
Estimated Date of Release	March 2, 2016				
Date Reported to NMOCD	March 3, 2016				
Reported by	Maren Coligan, Key Energy Services				
Land Owner	Millard D	eck Trust			
Reported To	NM Oil Co	onservation	n Division (I	NMOCD)	
Source of Release	Human Er	ror			
Released Material	Produced	Water			
Released Volume	80 bbls f	Produced V	Vater		
Recovered Volume	0 bbls Produced Water				
Net Release	80 bbls Produced Water				
Nearest Waterway	46 West of the location				
Depth to Groundwater	Estimated	to be 70 f	eet		



Nearest Domestic Water Source	Great than 1,000 feet
NMOCD Ranking	10
SMA Response Dates	Initial: 4/11/16 Mitigation Activities:
Estimated Yd ³ Contaminated Soil Excavated and Disposed	2,680

A copy of the C-141 Initial is located in Appendix B. For questions or comments pertaining to the release or the attached Work Plan, please feel free to contact either of us.

Submitted by:

SOUDER, MILLER & ASSOCIATES

Austin Weyant Project Scientist Reviewed by:

Cynthia Gray, CHMM Senior Scientist



SOIL REMEDIATION WORK PLAN FOR INCIDENT 1RP-4197

KEY ENERGY SERVICES, LLC

STATE "S" BRINE AND WATER STATION (BW-028)
API# 30-025-33547
SECTION 15, T21S R37E, NMPM
LEA COUNTY, NM



Prepared for: Key Energy Services LLC 6 Desta Dr. Suite 4300 Midland, TX 79705

Prepared by: Souder, Miller & Associates 201 S. Halagueno Carlsbad, NM 88221 575-689-7040

May 6, 2015 SMA Reference 5B24998 BG1



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1.0 Introduction

On behalf of Key Energy Services (Key) Souder Miller & Associates (SMA) has prepared this report that describes the assessment and initial delimitation of the releases associated with the State "S" Brine And Water Station (BW-028) in Lea County, New Mexico on land owned by the Millard Deck Trust. Figure 1 illustrates the vicinity and location of the site.

2.0 Site Ranking and Land Jurisdiction

The release site is located approximately 46 miles (> 1,000 feet) west of Salt Lake, in an area owned by Millard Deck Trust with an elevation of approximately 3,460 feet above sea level. After evaluation of the site using aerial photography and topographic maps, depth to groundwater is estimated to be greater less 100 feet but greater than 50 feet below ground surface (bgs). Figure 1 depicts the site vicinity and Figure 2 depicts the site details and sample locations.

SMA searched the New Mexico State Engineer's Office online water well database for water wells in the vicinity of the release. No well is located within a 1000 foot radius of the site. Figure 1 depicts the site vicinity and Figure 2 shows the site itself. The physical location of this release is within the jurisdiction of NMOCD.

This release location has been assigned a NMOCD ranking of 10 which requires a soil remediation standard of 10 parts per million (ppm) benzene, 50 ppm combined benzene, toluene, ethyl-benzene, and total xylenes (BTEX), and 1000 ppm total petroleum hydrocarbons (TPH). Table 1 illustrates site ranking rationale.

3.0 Assessment and Initial Results

On April 11, 2015, SMA personnel assessed the release area onsite with an gas powered auger, an Photo Ionization Detector (PID), and a mobile chlorides titration kit. The affected area was found to be 580 feet long and 15-80 feet wide. The release impact area was found to be in the pastor east of the well pad. Soils were impacted to at least 3 feet bgs in pasture. Sample locations are noted on Figure 2 Site Details and Sample Location Map. All samples were collected and processed according to NMOCD soil sampling procedures. The laboratory samples were sent under chain-of-custody protocols to Hall Environmental Analysis Laboratory for analysis for Benzene and Total BTEX using EPA Method 8021B, DRO and GRO by EPA Method 8015D, and total Chlorides using EPA Method 300.0.

4.0 Soil Remediation Work Plan

SMA will begin the site delineation and excavation of affected soils, with approval from area utilities owners via 811 and NMOCD. SMA personal continuously will guide the excavation activities by collecting composite soil samples for field screening with a mobile titration unit (EPA 4500) and a calibrated PID. Delineation will occurred to sufficiently map the plume of contamination by NMOCD standards. Delineation results from April 11, 2016 shows that affected soil occurs to a minimum of 3 feet bgs. The pasture will be excavated to 3 foot bgs to remove contaminated soil. The proposed excavation depths which will be based on delineation will be completed to achieve closure standards.

Excavation will occur to approximately three ft. bsg in the spill area. Samples will be taken in the sidewalls to ensure contaminated soils have been removed in the horizontal extent. Final

5/6/16

samples will be collected at final depth of excavation, where an in-situ cap will be placed within the excavation. The construction of the in-situ cap (Figure #3) has been designed to prevent both capillary and leaching movement of the brine affected soils. Starting from three ft. below surface grade, bentonite layer will be added to the bottom of the excavation. Then a plastic liner will be added as a capillary break between the affected soils and the proposed caliche cap. The caliche cap will consist of two feet of contaminant-free material placed, and compacted. Then, hay will be added above the caliche cap to form an intrusion barrier. This barrier will prevent leaching and formation of deep root systems into the cap itself. Topsoil will then be placed on top of the cap. The plastic liner on both sides of the caliche cap will effectively break the communication of precipitation through the compacted cap. After excavation, installation of insitu cap and backfill occurs topsoil will be added as over burden to help with contouring of the area. Final samples will be collected at the maximum depths of the excavation. Approximately 2,680 cubic yards of contaminated soil will excavated. The contaminated soil was transported for proper disposal at New Mexico permitted Sundance facility in New Mexico.

5.0 Conclusions and Recommendations

NMOCD Guidelines for Remediation of Leaks, Spills, and Releases have established the following action levels for contaminants of concern with a site ranking of 10: 10 ppm (mg/kg) Benzene, 50 ppm total BTEX, and 1000 ppm TPH. The release consisted of produced and associated petroleum found during the initial assessment and delineation.

After the soil remediation work plan is approved by NMOCD, SMA will begin soil remediation activities on site.

Soil contaminant concentrations found during the initial delineation are illustrated in Figure 2. A summary of the laboratory analyses is included in Table 3. Laboratory reports are included in Appendix A.

6.0 Closure and Limitations

The scope of our services consisted of the performance of a preliminary spill assessment, verification of release stabilization, regulatory liaison, and preparation of this Remediation Work Plan. All work has been performed in accordance with generally accepted professional environmental consulting practices for oil and gas releases in the Permian Basin in New Mexico.

If there are any questions regarding this report, please contact either Austin Weyant at 575-689-7040 or Cindy Gray at 505-325-7535.

Submitted by:

Reviewed by:

SOUDER, MILLER & ASSOCIATES

Austin Weyant Project Scientist Cynthia Gray, CHMM Senior Scientist

Figures:

Figure 1: Vicinity Map Figure 2: Site Map

Figure 3: In-situ Cap and Bio barrier Design

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Table 1: Release Information and Site Ranking

Table 2: Summary of Chloride Field Screening Results

Table 3: Summary of Laboratory Analyses

Appendices:

Appendix A: Laboratory Analytical Reports

Appendix B: Form C141 Initial

FIGURE 1 VICINITY MAP



FIGURE 2 SITE MAP

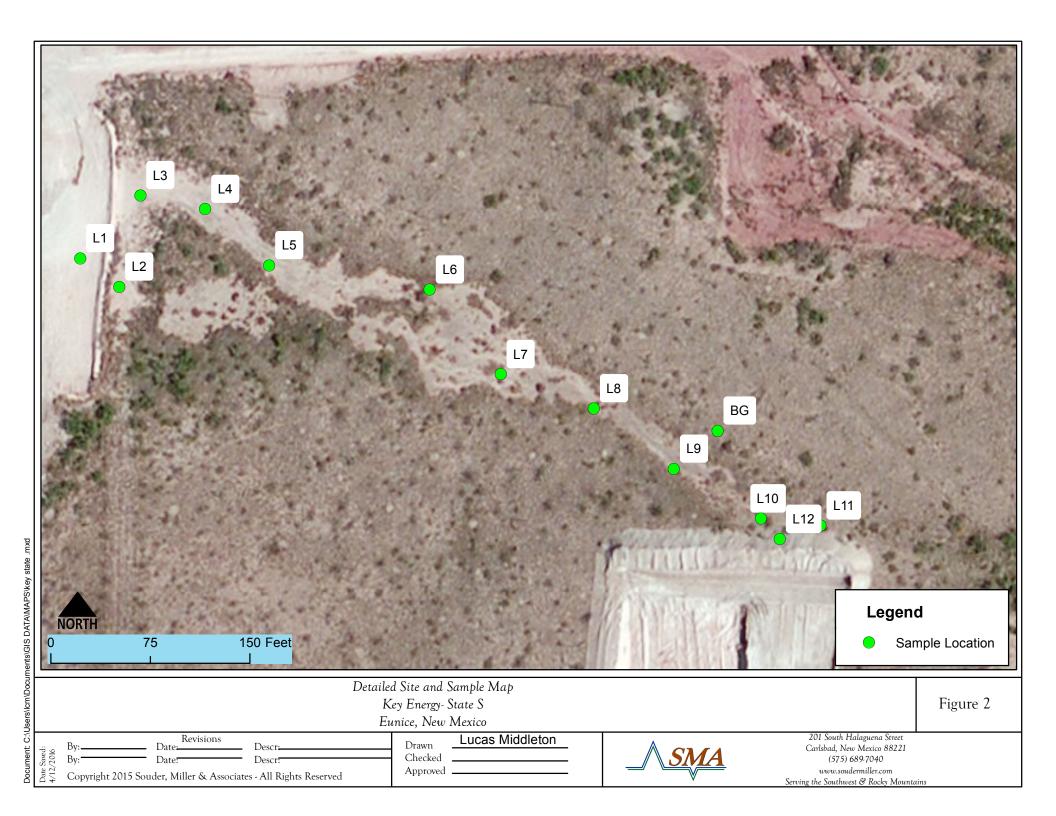
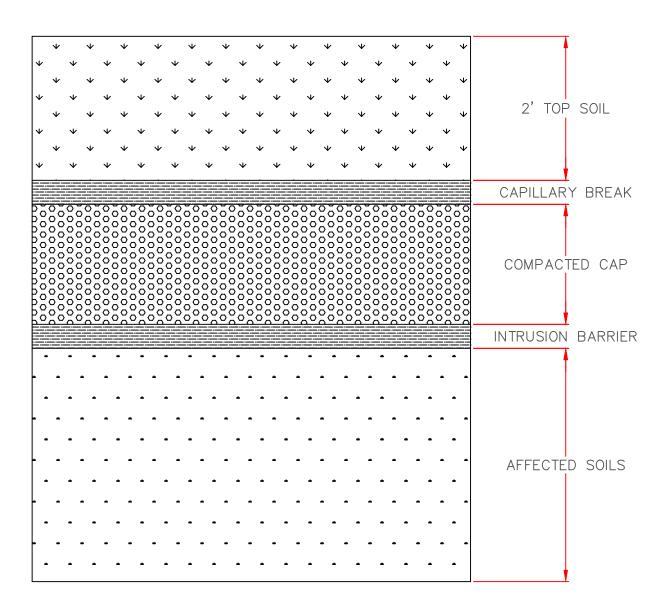


FIGURE 3 IN-SITU CAP AND BIO BARRIER DESIGN



COG



Souder, Miller & Associates

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Carlsbad, NM 88220
Phone (575) 689-7040
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Serving the Southwest & Rocky Mountains

IN-SITU CAP
AND BIOBARRIER DESIGN
Key Station- State 1 Brine Station

Figure 3

TABLE 1 RELEASE INFORMATION AND SITE RANKING

Key Energy LLC Table 1: Site Ranking

Site Ranking Determination Table

Depth to Groundwater	NMOCD Numeric Rank for this Site	Source for Ranking	Notes	
< 50 BGS = 20		USGS Topo Maps;	Monument Draw is 1 miles to the north east	
50' to 99' = 10	10	Google Earth Elevation Difference from the	elevation is	
>100' = 0		site and	approximately 2500 feet above salt lake	
Ranking Criteria for Horizontal Distance to Nearest Surface Water	NMOCD Numeric Rank for this Site	Source for Ranking	Notes	
< 200' = 20			Call I de la casa de la Call	
200' - 1000' = 10		USGS Topo Maps; Google Earth ; ArcMap	Salt Lake nearset surface water is 46 miles west of location	
>1000' = 0	0			
Ranking Criteria for Horizontal Distance to a Water Well or Water Source	NMOCD Numeric Rank for this Site	Source for Ranking	Notes	
<1000' from a water source? <200'	0	NM State Engineer	accreate well is 1000	
source? YES OR NO to BOTH. YES = 20, NO = 0	urce? YES OR NO to BOTH. YES =		nearest well is 1080 feet west of location	
- 140 - 11				
Total Site Ranking Soil Remedation Standards	0 to 9	10 10 to 19	>19	
Jon Kemedation Standards	0 10 9	10 (0 19	×13	
Benzene	10 PPM	10 PPM	10 PPM	
BTEX	50 PPM	50 PPM	50 PPM	
ТРН	5000 PPM	1000 PPM	100 PPM	





New Mexico Office of the State Engineer Water Column/Average Depth to Water

(A CLW#### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced, O=orphaned, C=the file is

(quarters are 1=NW 2=NE 3=SW 4=SE)

closed) (quarters are smallest to largest) (NAD83 UTM in meters)

(In feet)

POD

Sub-QQQ Code basin County 64 16 4 Sec Tws Rng

POD Number CP 00554 2 2 16 21S 37E

3595610* 672744

302

Distance

Well Water Column 80

Depth Depth Water

Average Depth to Water: 70 feet

> Minimum Depth: 70 feet

70 feet Maximum Depth:

Record Count: 1

UTMNAD83 Radius Search (in meters):

Radius: 1000 Easting (X): 673042 Northing (Y): 3595557.18

TABLE 2 SUMMARY OF CHLORIDE FIELD SCREENING RESULTS

	FIELD SCREENING RESULTS SUMMARY							
Date	Time	Field Screening Reference	Sample Depth (Feet BGS)	PID Reading	Lab Sample Collected Y/N			
4/11/2016	11:00 a.m.	L1-S	Surface	2,394	Υ			
4/11/2016	11:00 a.m.	L1-1	1'	559	Υ			
4/11/2016	11:00 a.m.	L1-3	3'	301	Υ			
4/11/2016	11:00 a.m.	L2-1	1'	3,354	Υ			
4/11/2016	11:00 a.m.	L3-1	1	8,385	Υ			
4/11/2016	11:00 a.m.	L4-1.5	1.5'	7,769	Υ			
4/11/2016	11:00 a.m.	L5-0.5	.5'	6,106	Υ			
4/11/2016	11:00 a.m.	L6-0.5	.5'	7,697	Υ			
4/11/2016	11:00 a.m.	L6-2	2'	7,511	Υ			
4/11/2016	11:00 a.m.	L6-1	1'	5,203	Υ			
4/11/2016	11:00 a.m.	L7-1	1'	5,762	Υ			
4/11/2016	11:00 a.m.	L8-1	1'	7,181	Υ			
4/11/2016	11:00 a.m.	L9-1	1'	8,185	Υ			
4/11/2016	11:00 a.m.	L10-1.5	1.5'	3,899	Υ			
4/11/2016	11:00 a.m.	L10-3	3'	258	Υ			
4/11/2016	11:00 a.m.	L11-S	Surface	559	Υ			
4/11/2016	11:00 a.m.	L11-1	1'	140	Υ			
4/11/2016	11:00 a.m.	L12-1	1'	4,186	Υ			
4/11/2016	11:00 a.m.	BG	1'	180	Υ			



TABLE 3 SUMMARY OF LABORATORY ANALYSES

Table 3: Summary of Laboratory Analyses

Analytical Report-	Sample Number on	Sample Date	Depth	BTEX	Benzene	GRO	DRO	CI-
TC84237	Figure 2 Map	Sample Date	Берш	ppm	mg/Kg	mg/Kg	mg/Kg	mg/Kg
TC84237- 1	L1-1	4/11/2016	1'	N/A	N/A	N/A	N/A	440
TC84237- 2	L1-3	4/11/2016	3'	N/A	N/A	N/A	N/A	116
TC84237-	L2-1	4/11/2016	1'	N/A	N/A	N/A	N/A	4290
TC84237- 4	L3-1	4/11/2016	1'	N/A	N/A	N/A	N/A	9,880
TC84237- 5	L4-1.5	4/11/2016	1.5'	N/A	N/A	N/A	N/A	9,620
TC84237- 6	L5-0.5	4/11/2016	0.5'	N/A	N/A	N/A	N/A	7790
TC84237- 7	L6-0.5	4/11/2016	0.5'	N/A	N/A	N/A	N/A	8290
TC84237- 8	L6-1	4/11/2016	1'	N/A	N/A	N/A	N/A	5650
TC84237- 9	L6-2	4/11/2016	2'	N/A	N/A	N/A	N/A	5510
TC84237- 10	L7-1	4/11/2016	1'	N/A	N/A	N/A	N/A	5490
TC84237- 11	L8-1	4/11/2016	1'	N/A	N/A	N/A	N/A	7840
TC84237- 12	L9-1	4/11/2016	1'	N/A	N/A	N/A	N/A	4190
TC84237- 13	L10-1.5	4/11/2016	1.5'	N/A	N/A	N/A	N/A	374
TC84237- 14	L10-3	4/11/2016	3'	N/A	N/A	N/A	N/A	1290
TC84237- 15	L11-5	4/11/2016	5'	N/A	N/A	N/A	N/A	BDL
TC84237- 16	L11-1	4/11/2016	1'	N/A	N/A	N/A	N/A	BDL
TC84237- 17	L12-1	4/11/2016	2'	N/A	N/A	N/A	N/A	5140
TC84237- 18	BG	4/11/2016	Surface	N/A	N/A	N/A	N/A	38.2

APPENDIX A LABORATORY ANALYTICAL REPORTS



ACCUTEST Gulf Coast

05/03/16

SGS ACCUTEST IS PART OF SGS, THE WORLD'S LEADING INSPECTION, VERIFICATION, TESTING AND CERTIFICATION COMPANY.



e-Hardcopy 2.0
Automated Report

Technical Report for

Key Energy

State# S Brine Station

SGS Accutest Job Number: TC84237

Sampling Date: 04/11/16

Report to:

Key Energy 6 Desota Drvie Suite 4300 Midland, TX 79705 aramirez01@keyenergy.com

ATTN: Ana Ramirez

Total number of pages in report: 37



Test results contained within this data package meet the requirements of the National Environmental Laboratory Accreditation Program and/or state specific certification programs as applicable.

Client Service contact: Electa Brown 713-271-4700

Certifications: TX (T104704220-16-24) AR (14-016-0) AZ (AZ0769) FL (E87628) KS (E-10366) LA (85695/04004) NJ (TX010) OK (2014-172) VA (7654)

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SGS

Richard Rodriguez

Laboratory Director

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Sample Summary

Key Energy

State# S Brine Station

Job No: TC84237

Sample Number	Collected Date	Time By	Received	Matri Code		Client Sample ID
TC84237-1	04/11/16	10:00	04/22/16	SO	Soil	L1-1
TC84237-2	04/11/16	10:00	04/22/16	SO	Soil	L1-3
TC84237-3	04/11/16	10:00	04/22/16	SO	Soil	L2-1
TC84237-4	04/11/16	10:00	04/22/16	SO	Soil	L3-1
TC84237-5	04/11/16	10:00	04/22/16	SO	Soil	L4-1.5
TC84237-6	04/11/16	10:00	04/22/16	SO	Soil	L5-0.5
TC84237-7	04/11/16	10:00	04/22/16	SO	Soil	L6-0.5
TC84237-8	04/11/16	10:00	04/22/16	SO	Soil	L6-1
TC84237-9	04/11/16	10:00	04/22/16	SO	Soil	L6-2
TC84237-10	04/11/16	10:00	04/22/16	SO	Soil	L7-1
TC84237-11	04/11/16	10:00	04/22/16	SO	Soil	L8-1
TC84237-12	04/11/16	10:00	04/22/16	SO	Soil	L9-1
TC84237-13	04/11/16	10:00	04/22/16	SO	Soil	L10-1.5

Soil samples reported on a dry weight basis unless otherwise indicated on result page.





Sample Summary (continued)

Key Energy

State# S Brine Station

Job No: TC84237

Sample Number	Collected Date	Time By	Received	Matri Code		Client Sample ID
TC84237-14	04/11/16	10:00	04/22/16	SO	Soil	L10-3
TC84237-15	04/11/16	10:00	04/22/16	SO	Soil	L11-5
TC84237-16	04/11/16	10:00	04/22/16	SO	Soil	L11-1
TC84237-17	04/11/16	10:00	04/22/16	SO	Soil	L12-1
TC84237-18	04/11/16	10:00	04/22/16	SO	Soil	B6

Soil samples reported on a dry weight basis unless otherwise indicated on result page.



Summary of Hits
Job Number: TC84237
Account: Key Energy
Project: State# S Brine Station

Collected: 04/11/16

	Client Sample ID					
Analyte		Qual	RL	MDL	Units	Method
TC84237-1	L1-1					
Chloride ^a		440	22		mg/kg	EPA 300/SW846 9056A
TC84237-2	L1-3					
Chloride ^a		116	22		mg/kg	EPA 300/SW846 9056A
TC84237-3	L2-1					
Chloride ^a		4290	22		mg/kg	EPA 300/SW846 9056A
TC84237-4	L3-1					
Chloride a		9880	89		mg/kg	EPA 300/SW846 9056A
TC84237-5	L4-1.5					
Chloride ^a		9620	89		mg/kg	EPA 300/SW846 9056A
TC84237-6	L5-0.5					
Chloride ^a		7790	67		mg/kg	EPA 300/SW846 9056A
TC84237-7	L6-0.5					
Chloride ^a		8290	89		mg/kg	EPA 300/SW846 9056A
TC84237-8	L6-1					
Chloride ^a		5650	68		mg/kg	EPA 300/SW846 9056A
TC84237-9	L6-2					
Chloride ^a		5510	66		mg/kg	EPA 300/SW846 9056A
TC84237-10	L7-1					
Chloride ^a		5490	46		mg/kg	EPA 300/SW846 9056A
TC84237-11	L8-1					
Chloride a		7840	69		mg/kg	EPA 300/SW846 9056A

Summary of Hits Job Number: TC84237 Key Energy Account:

State# S Brine Station **Project:**

Collected: 04/11/16

Lab Sample ID Analyte	Client Sample ID	Result/ Qual	RL	MDL	Units	Method
TC84237-12	L9-1					
Chloride ^a		4190	23		mg/kg	EPA 300/SW846 9056A
TC84237-13	L10-1.5					
Chloride ^a		374	22		mg/kg	EPA 300/SW846 9056A
TC84237-14	L10-3					
Chloride ^a		1290	21		mg/kg	EPA 300/SW846 9056A
TC84237-15	L11-5					
No hits reported	in this sample.					
TC84237-16	L11-1					
No hits reported	in this sample.					
TC84237-17	L12-1					
Chloride ^a		5140	65		mg/kg	EPA 300/SW846 9056A
TC84237-18	B6					
Chloride ^a		38.2	21		mg/kg	EPA 300/SW846 9056A

⁽a) Analysis performed at Accutest Laboratories, Dayton, NJ.

Section 3 &

Sample Results	
Report of Analysis	

Report of Analysis

Page 1 of 1

Client Sample ID: L1-1

 Lab Sample ID:
 TC84237-1
 Date Sampled:
 04/11/16

 Matrix:
 SO - Soil
 Date Received:
 04/22/16

 Percent Solids:
 90.3

Project: State# S Brine Station

General Chemistry

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride ^a	440	22	mg/kg	1	05/02/16 22:23	ANJ	EPA 300/SW846 9056A
Solids, Percent	90.3		%	1	04/26/16	DS	SM 2540 G

(a) Analysis performed at Accutest Laboratories, Dayton, NJ.

Page 1 of 1

Report of Analysis

Client Sample ID: L1-3

 Lab Sample ID:
 TC84237-2
 Date Sampled:
 04/11/16

 Matrix:
 SO - Soil
 Date Received:
 04/22/16

 Percent Solids:
 90.0

Project: State# S Brine Station

General Chemistry

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride ^a	116	22	mg/kg	1	05/02/16 23:11	ANJ	EPA 300/SW846 9056A
Solids, Percent	90		%	1	04/26/16	DS	SM 2540 G

(a) Analysis performed at Accutest Laboratories, Dayton, NJ.

Report of Analysis

Page 1 of 1

Client Sample ID: L2-1

 Lab Sample ID:
 TC84237-3
 Date Sampled:
 04/11/16

 Matrix:
 SO - Soil
 Date Received:
 04/22/16

 Percent Solids:
 90.5

Project: State# S Brine Station

General Chemistry

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride ^a	4290	22	mg/kg	1	05/02/16 23:35	ANJ	EPA 300/SW846 9056A
Solids, Percent	90.5		%	1	04/26/16	DS	SM 2540 G

(a) Analysis performed at Accutest Laboratories, Dayton, NJ.

Report of Analysis

Page 1 of 1

Client Sample ID: L3-1

 Lab Sample ID:
 TC84237-4
 Date Sampled:
 04/11/16

 Matrix:
 SO - Soil
 Date Received:
 04/22/16

 Percent Solids:
 89.2

Project: State# S Brine Station

General Chemistry

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride ^a	9880	89	mg/kg	4	05/02/16 23:59	ANJ	EPA 300/SW846 9056A
Solids, Percent	89.2		%	1	04/26/16	DS	SM 2540 G

(a) Analysis performed at Accutest Laboratories, Dayton, NJ.

Page 1 of 1

Report of Analysis

report of rinarysis

Client Sample ID: L4-1.5 Lab Sample ID: TC84237-5 Matrix: SO - Soil

Date Sampled: 04/11/16 **Date Received:** 04/22/16 **Percent Solids:** 89.4

Project: State# S Brine Station

General Chemistry

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride ^a	9620	89	mg/kg	4	05/03/16 13:45	ANJ	EPA 300/SW846 9056A
Solids, Percent	89.4		%	1	04/26/16	DS	SM 2540 G

(a) Analysis performed at Accutest Laboratories, Dayton, NJ.

RL = Reporting Limit

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Page 1 of 1

Report of Analysis

Client Sample ID: L5-0.5 Lab Sample ID: TC84237-6 Matrix: SO - Soil

Date Sampled: 04/11/16 **Date Received:** 04/22/16 **Percent Solids:** 89.0

Project: State# S Brine Station

General Chemistry

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride ^a	7790	67	mg/kg	3	05/03/16 01:35	ANJ	EPA 300/SW846 9056A
Solids, Percent	89		%	1	04/26/16	DS	SM 2540 G

(a) Analysis performed at Accutest Laboratories, Dayton, NJ.

RL = Reporting Limit

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Report of Analysis

Page 1 of 1

Client Sample ID: L6-0.5 Lab Sample ID:

TC84237-7 **Date Sampled:** 04/11/16 Matrix: SO - Soil **Date Received:** 04/22/16 Percent Solids: 89.5

Project: State# S Brine Station

General Chemistry

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride ^a	8290	89	mg/kg	4	05/03/16 01:59	ANJ	EPA 300/SW846 9056A
Solids, Percent	89.5		%	1	04/26/16	DS	SM 2540 G

(a) Analysis performed at Accutest Laboratories, Dayton, NJ.

Report of Analysis

Page 1 of 1

Client Sample ID: L6-1

Lab Sample ID: TC84237-8 **Date Sampled:** 04/11/16 Matrix: SO - Soil **Date Received:** 04/22/16 **Percent Solids:** 87.6

Project: State# S Brine Station

General Chemistry

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride ^a	5650	68	mg/kg	3	05/03/16 02:22	ANJ	EPA 300/SW846 9056A
Solids, Percent	87.6		%	1	04/26/16	DS	SM 2540 G

(a) Analysis performed at Accutest Laboratories, Dayton, NJ.

Client Sample ID: L6-2

Lab Sample ID: TC84237-9 **Date Sampled:** 04/11/16 Matrix: SO - Soil **Date Received:** 04/22/16 **Percent Solids:** 90.3

Project: State# S Brine Station

General Chemistry

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride ^a	5510	66	mg/kg	3	05/03/16 02:46	ANJ	EPA 300/SW846 9056A
Solids, Percent	90.3		%	1	04/26/16	DS	SM 2540 G

(a) Analysis performed at Accutest Laboratories, Dayton, NJ.

RL = Reporting Limit

Page 1 of 1

Page 1 of 1

Client Sample ID: L7-1

 Lab Sample ID:
 TC84237-10
 Date Sampled:
 04/11/16

 Matrix:
 SO - Soil
 Date Received:
 04/22/16

 Percent Solids:
 87.3

Project: State# S Brine Station

General Chemistry

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride ^a	5490	46	mg/kg	2	05/03/16 03:10	ANJ	EPA 300/SW846 9056A
Solids, Percent	87.3		%	1	04/26/16	DS	SM 2540 G

(a) Analysis performed at Accutest Laboratories, Dayton, NJ.

Page 1 of 1

Client Sample ID: L8-1

 Lab Sample ID:
 TC84237-11
 Date Sampled:
 04/11/16

 Matrix:
 SO - Soil
 Date Received:
 04/22/16

 Percent Solids:
 86.3

Project: State# S Brine Station

General Chemistry

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride ^a	7840	69	mg/kg	3	05/03/16 03:34	ANJ	EPA 300/SW846 9056A
Solids, Percent	86.3		%	1	04/26/16	DS	SM 2540 G

(a) Analysis performed at Accutest Laboratories, Dayton, NJ.

Page 1 of 1

Client Sample ID: L9-1

 Lab Sample ID:
 TC84237-12
 Date Sampled:
 04/11/16

 Matrix:
 SO - Soil
 Date Received:
 04/22/16

 Percent Solids:
 87.1

Project: State# S Brine Station

General Chemistry

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride ^a	4190	23	mg/kg	1	05/03/16 03:58	ANJ	EPA 300/SW846 9056A
Solids, Percent	87.1		%	1	04/26/16	DS	SM 2540 G

(a) Analysis performed at Accutest Laboratories, Dayton, NJ.

Page 1 of 1

Client Sample ID: L10-1.5 Lab Sample ID: TC84237-13 Matrix: SO - Soil

Date Sampled: 04/11/16 **Date Received:** 04/22/16 **Percent Solids:** 92.1

Project: State# S Brine Station

General Chemistry

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride ^a	374	22	mg/kg	1	05/03/16 04:22	ANJ	EPA 300/SW846 9056A
Solids, Percent	92.1		%	1	04/26/16	DS	SM 2540 G

(a) Analysis performed at Accutest Laboratories, Dayton, NJ.

Page 1 of 1

Client Sample ID: L10-3

 Lab Sample ID:
 TC84237-14
 Date Sampled:
 04/11/16

 Matrix:
 SO - Soil
 Date Received:
 04/22/16

 Percent Solids:
 92.6

Project: State# S Brine Station

General Chemistry

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride ^a	1290	21	mg/kg	1	05/03/16 04:46	ANJ	EPA 300/SW846 9056A
Solids, Percent	92.6		%	1	04/26/16	DS	SM 2540 G

(a) Analysis performed at Accutest Laboratories, Dayton, NJ.

Page 1 of 1

Client Sample ID: L11-5

 Lab Sample ID:
 TC84237-15
 Date Sampled:
 04/11/16

 Matrix:
 SO - Soil
 Date Received:
 04/22/16

 Percent Solids:
 95.7

Project: State# S Brine Station

General Chemistry

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride ^a	< 21	21	mg/kg	1	05/03/16 05:10	ANJ	EPA 300/SW846 9056A
Solids, Percent	95.7		%	1	04/26/16	DS	SM 2540 G

(a) Analysis performed at Accutest Laboratories, Dayton, NJ.

Page 1 of 1

Client Sample ID: L11-1

 Lab Sample ID:
 TC84237-16
 Date Sampled:
 04/11/16

 Matrix:
 SO - Soil
 Date Received:
 04/22/16

 Percent Solids:
 93.2

Project: State# S Brine Station

General Chemistry

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride ^a	< 21	21	mg/kg	1	05/03/16 06:22	ANJ	EPA 300/SW846 9056A
Solids, Percent	93.2		%	1	04/26/16	DS	SM 2540 G

(a) Analysis performed at Accutest Laboratories, Dayton, NJ.

Page 1 of 1

Client Sample ID: L12-1

Lab Sample ID: TC84237-17 **Date Sampled:** 04/11/16 Matrix: SO - Soil **Date Received:** 04/22/16 **Percent Solids:** 91.5

Project: State# S Brine Station

General Chemistry

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride ^a	5140	65	mg/kg	3	05/03/16 14:09	ANJ	EPA 300/SW846 9056A
Solids, Percent	91.5		%	1	04/26/16	DS	SM 2540 G

(a) Analysis performed at Accutest Laboratories, Dayton, NJ.

Page 1 of 1

Client Sample ID: B6

Lab Sample ID: TC84237-18 **Date Sampled:** 04/11/16 Matrix: SO - Soil **Date Received:** 04/22/16 **Percent Solids:** 94.3

Project: State# S Brine Station

General Chemistry

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride ^a	38.2	21	mg/kg	1	05/03/16 07:10	ANJ	EPA 300/SW846 9056A
Solids, Percent	94.3		%	1	04/26/16	DS	SM 2540 G

(a) Analysis performed at Accutest Laboratories, Dayton, NJ.



Section 4

Misc. Forms
Custody Documents and Other Forms
Includes the following where applicable:

• Chain of Custody

SGS	

CHAIN OF CUSTODY

PAGEOF

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ı				TEL. 713	-271-470		713-2							SGS A	coutest Q	icte#			1	SGS Ac	cutest Jo	ob#	C	8	167		
Client / Reporting Information				Project	Informa	tion	100									R	e q u	este	d /	Ana	lyse	9.5			Matrix Codes		
Company Name Key Finergy Scrvice Street Address (a) Drotz Br Sunk 4300 City State Zip Molen Tx 79705 Project Contact E-mail	Project N	lame:	State	<u> </u>										(00)											DW - Drinking Water		
Nech N Sout 4300	Street							351010		-	120600			4	2				- 1						GW - Ground Water WW - Water		
City State Zip Md/w Ty 79705	City			State	Company	nformatio / Name	on (ir	аптег	ent fro	m Ke	oort to)		100											SW - Surface Water SO - Soil SL- Sludge		
Project Contact E-mail Ana Ranire Z	Project #		***************************************		Street Ac	dress								7											SED-Sediment OI - Oil LIQ - Other Liquid		
Ang Romine Z Phone # Ara A 201 Okey any Com Sampler(e) Name(e) Phone #	Client Pu	rchase Or	der#		City				s	tate		Z	ip.	700	Ú.						م. سب		1		AIR - Air SOL - Other Solid WP - Wipe		
Sampler(s) Name(s) Phone # Lucas Middleta 575-689-555 /	Project M	lanager		,	Attention									100									2		FB-Field Blank		
SGS Accutest		Т	Collect	ion	T	# of	T.	E	Numbe	T	ğ _		S S	7									-				
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Standard 5 Day <i>RUSH</i>	Approved I	By (SGS Ac	cutest PM): / Date:			Commerc Commerc	iai "E)" (Le				_) Form	at								2/60		<i>to</i>			
4 Day RUSH 3 Day RUSH 2 Day RUSH			FULT1 (Level 344) Other Lucas, m.ddleton @ soudes miller.									mitlet.con															
1 Day EMERGENCY Emergency & Rush T/A data available VIA Lablink	Commercial "A" = Results Only Commercial "B" = Results + QC Summary																										
	Form: SM021-0 Commercial "C" = Results + QC & Surrogate Summary Sample Custody must be documented below each time samples change posses#ion, including courier delivery.										77																
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TC84237: Chain of Custody Page 1 of 3

SGS	

CHAIN OF CUSTODY

PA	GE	2	OF	<u>2</u>

SUS ACCU	TEST		10165 Harwin Dr, Ste 150 Houston, TX 77036 TEL 713-271-4700 FAX: 713-271-4770 www.accutest.com Project Information											EX Tracking Accutest Qu					1	order Cor		(ZL	137
Client / Reporting Information			Project			(6)										D 0 0		ted	<u> </u>	11100				Matrix Codes
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City State Zip	City		State	Billing I Company	nformatio Name	n (if d	lfferer	nt from	Repo	ort to)			700	u 1										WW - Water SW - Surface Water SO - Soil SL- Sludge
Project Contact E-mail	Project #	**************************************		Street Ad	dress								۱, ا											SED-Sediment OI - Oil LIQ - Other Liquid
Phone # Fax #	Client Purchase			City				Sta	te		Z	ip]	<u>.</u>										AIR - Air SOL - Other Solid WP - Wipe
Sampler(s) Name(s) Phone #	Project Manager	Colles	~600	Attention			N.	umber o						701										FB-Field Blank
SGS Accutent Sample # Field ID / Point of Collection	Date	Time	Sempled By	Matrix	# of bottles	HCI NaOH	P.	HZSO4	NONE DI Motor	1		ENCORE	OTHER	ار										LAB USE ONLY
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Emergency & Rush T/A data available V/A Lablink			_			Co	mmen	cial "B"	= Re	sults +	QC S	Summa		}										
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TC84237: Chain of Custody Page 2 of 3

SGS Accutest Sample Receipt Summary

Job Number: TC84237			Client: KEY ENE	RGY SE	RVICE	Project: STATE S				
Date / Time Received:			Delivery	Method	:	Airbill #'s: 782887709606				
No. Coolers: 1	Therm	ID: IR	-4;			Temp Adjustment Factor: 0	;			
Cooler Temps (Initial/Adjusted): <u>#1:</u>	(5.9/5.9	<u>));</u>							
Cooler Security Y	or N			<u>Y</u> 0	or N	Sample Integrity - Documentation	Υ	or	N	
 Custody Seals Present: Custody Seals Intact: 			COC Present: ppl Dates/Time OK	y		Sample labels present on bottles: Container labeling complete:	✓			
Cooler Temperature	<u>Y</u> o	r N				3. Sample container label / COC agree:	✓			
1. Temp criteria achieved:	✓					Sample Integrity - Condition	<u>Y</u>	or	N	
Cooler temp verification: Cooler media:	lce	(Bag)				Sample recvd within HT:	✓			
						2. All containers accounted for:	✓			
Quality Control Preservation		or N	<u>N/A</u>	WTB	STB	3. Condition of sample:		Intact		
Trip Blank present / cooler:			lacksquare	Sample Integrity - Instructions	<u>Y</u>	or	N	N/A		
2. Trip Blank listed on COC:			\checkmark			Analysis requested is clear:	✓	[
3. Samples preserved properly:	✓					Bottles received for unspecified tests		[✓	
4. VOCs headspace free:			\checkmark			3. Sufficient volume recvd for analysis:	✓	[
						Compositing instructions clear:		[✓
						5. Filtering instructions clear:		[✓
Comments Sample #8 L6-1 was i	received	l broken.								

TC84237: Chain of Custody

Page 3 of 3



Section 5

Custo	dy Documer	its and Othe	r Forms
(Accut	est New Jersey	7)	

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	Client / Reporting Information			1CL. //		w.sgs.com		-4770						SGS Ac	utest Quote #				SGS A	ccutest Jo	^{эв} т	C84237		
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TC84237: Chain of Custody
Page 1 of 3
Accutest New Jersey

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TC84237: Chain of Custody Page 2 of 3

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Job Number:	ГС84237		Client:				Project:			
Date / Time Received: 4	1/27/2016	10:15:00 <i>A</i>	AM_	Delivery N	lethod:	·	Airbill #'s:			
Cooler Temps (Raw Meas Cooler Temps (Corre	,		. ,							
Cooler Security 1. Custody Seals Present: 2. Custody Seals Intact: Cooler Temperature	~		COC P	resent: es/Time OK	<u>Y</u> •	or N □ □	Sample Integrity - Documentation 1. Sample labels present on bottles: 2. Container labeling complete: 3. Sample container label / COC agree:	<u>Y</u>	or N	
Temp criteria achieved: Cooler temp verification: Cooler media: No. Coolers:		IR Gun Ice (Bag)					Sample Integrity - Condition 1. Sample recvd within HT: 2. All containers accounted for: 3. Condition of sample:	<u>Y</u> ✓	or N	
Quality Control Preserva 1. Trip Blank present / coole 2. Trip Blank listed on COC: 3. Samples preserved proper	er:	✓	N/A	1			Sample Integrity - Instructions 1. Analysis requested is clear: 2. Bottles received for unspecified tests 3. Sufficient volume recvd for analysis:	Y	or N	N/A
4. VOCs headspace free:			✓				Compositing instructions clear: Filtering instructions clear:			✓
Comments										

SGS Accutest Sample Receipt Summary

TC84237: Chain of Custody

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Section 6

General Chemistry

QC Data Summaries

(Accutest New Jersey)

Includes the following where applicable:

- Method Blank and Blank Spike Summaries
- Duplicate Summaries
- Matrix Spike Summaries



Login Number: TC84237

Account: ALGC - Accutest Laboratories Gulf Coast, Inc.

Project: KEYETXM: State# S Brine Station

Analyte	Batch ID	RL	MB Result	Units	Spike Amount	BSP Result	BSP %Recov	QC Limits
Chloride	GP97276/GN45014	20	0.0	mg/kg	800	794	99.3	90-110%

Associated Samples:

Batch GP97276: TC84237-1, TC84237-2, TC84237-3, TC84237-4, TC84237-5, TC84237-6, TC84237-7, TC84237-8, TC84237-9, TC84237-10, TC84237-11, TC84237-12, TC84237-13, TC84237-14, TC84237-15, TC84237-16, TC84237-17, TC84237-18

(*) Outside of QC limits

DUPLICATE RESULTS SUMMARY GENERAL CHEMISTRY

Login Number: TC84237

Account: ALGC - Accutest Laboratories Gulf Coast, Inc.

Project: KEYETXM: State# S Brine Station

Analyte	Batch ID	QC Sample	Units	Original Result	DUP Result	RPD	QC Limits
Chloride	GP97276/GN45014	TC84237-1	mg/kg	440	434	1.4	0-20%

Associated Samples:

Batch GP97276: TC84237-1, TC84237-2, TC84237-3, TC84237-4, TC84237-5, TC84237-6, TC84237-7, TC84237-8, TC84237-9, TC84237-9 10, TC84237-11, TC84237-12, TC84237-13, TC84237-14, TC84237-15, TC84237-16, TC84237-17, TC84237-18 (*) Outside of QC limits

SGS ACCUTEST

MATRIX SPIKE RESULTS SUMMARY GENERAL CHEMISTRY

Login Number: TC84237

Account: ALGC - Accutest Laboratories Gulf Coast, Inc.

Project: KEYETXM: State# S Brine Station

Analyte	Batch ID	QC Sample	Units	Original Result	Spike Amount	MS Result	%Rec	QC Limits
Chloride	GP97276/GN45014	TC84237-1	mg/kg	440	880	1370	105.7	80-120%
Chloride	GP97276/GN45014	TC84237-2	mg/kg	116	888	1280	131.1N(a)	80-120%

Associated Samples:

Batch GP97276: TC84237-1, TC84237-2, TC84237-3, TC84237-4, TC84237-5, TC84237-6, TC84237-7, TC84237-8, TC84237-9, TC84237-9 $10,\ \texttt{TC84237-11},\ \texttt{TC84237-12},\ \texttt{TC84237-13},\ \texttt{TC84237-14},\ \texttt{TC84237-15},\ \texttt{TC84237-16},\ \texttt{TC84237-17},\ \texttt{TC84237-18}$

- (*) Outside of QC limits
- (N) Matrix Spike Rec. outside of QC limits
 (a) Spike recovery indicates possible matrix interference and/or sample nonhomogeneity.

APPENDIX B FORM C141 INITIAL