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REPORTS

DATE: 1999



SAN JUAN DIVISION

March 29, 2000

MAR 31 2000

Oil Conservation Division

Certified: P 895 114 539

Bill Olson New Mexico Oil Conservation Division 2040 S. Pacheco Santa Fe, NM 87505

RE: 1999 Annual Groundwater Investigation and Remediation Reports San Juan Basin, New Mexico

Dear Mr. Olson:

As required in Burlington Resources' approved Groundwater Investigation and Remediation Plan dated August, 1998, enclosed are the 1999 annual reports for Burlington's groundwater impact sites in the San Juan Basin. Separate reports are enclosed for the following locations:

Cozzens B#1 Fogelson #4-1 Hampton #4M Johnson Federal #4 Metering Station Standard Oil Com. #1

If you have questions or additional information is needed, please contact me at (505) 326-9841.

Sincerely,

2) Hesely

Ed Hasely Sr. Staff Environmental Representative

Attachments - Groundwater Investigation and Remediation Reports

cc: Denny Foust - NMOCD Aztec Bruce Gantner - BR PNM - Maureen Gannon (Cozzens B#1, Hampton #4M) EPFS - Scott Pope (Fogelson #4-1, Johnson Fed. #4, Standard Oil Com.#1) Facility Files Correspondence

BURLINGTON RESOURCES 1999 ANNUAL GROUNDWATER REPORT

Taylor Com. #2A

SITE DETAILS

Location: Unit Letter A, Section 17, Township 30N, Range 11W; San Juan County, New Mexico Land Type: Fee

PREVIOUS ACTIVITIES

During a spill cleanup on the subject location, Burlington Resources excavated into an apparent abandon earthen pit. As excavation of impacted soils continued, groundwater was encountered at approximately 9 feet below the ground surface. Impacted soils continued to be excavated to the extent practical until the "core" of impacted soils had been removed (approximate depth of 12 ft.). The excavation was backfilled with clean fill.

1999 ACTIVITIES

A groundwater monitoring well was installed in the center of the former earthen pit in May 1999. After developing the well and allowing it to stabilize, the well was purged and sampled on May 27, 1999.

Two downgradient groundwater monitoring wells were installed in October 1999. After developing the wells and allowing them to stabilize, the wells were purged and sampled on October 21, 1999.

Quarterly groundwater monitoring continued through 1999. A summary of the groundwater analytical data is presented in Table 1. A site map is presented as Figure 1.

CONCLUSIONS

Analytical results of groundwater sampling from the source monitoring well in the initial sampling event on May 27, 1999 show levels of benzene above New Mexico Groundwater Standards. All subsequent quarterly sampling from the source well and the two additional downgradient wells have shown all BTEX constituents to be below standards.

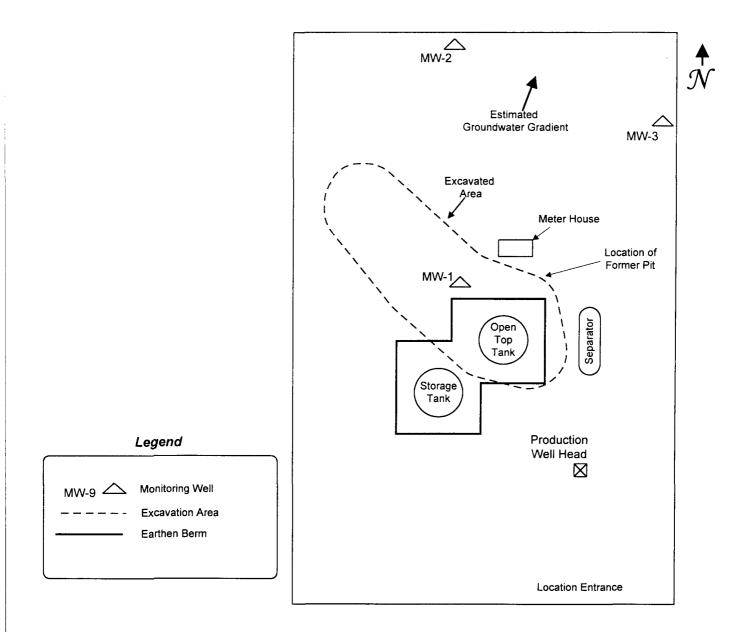
RECOMMENDATIONS

- Burlington Resources proposes to continue quarterly sampling at this site.
- Upon receiving analytical results below standards for one full year, Burlington Resources will request official closure of this site.

Attachments:Figure 1 - Site Map
Table 1 - Groundwater Sampling Results Summary
1999 Groundwater Analytical Results
Drilling Logs/Wellbore Diagrams
Letter to Olson dated August 13, 1999 including the Drilling Log/Wellbore Diagram

Figure 1

Taylor Com 2A - Site Diagram



3/28/00 LEH

Table 1

Groundwater Monitoring Well Sampling

Well Name	MW #	Sample Date	B (ppb)	T (ppb)	E (ppb)	X (ppb)	BTEX (ppb)	DTW (ft)
Standard			10	750	750	620		
Taylor #2A	1	5/27/99 9/1/99	64 <0.5	<0.5 <0.5	<u>23</u> 1.3		185 2.9	3.72
		10/21/99 1/19/00	0.7	<u> </u>	1.3 1.2 0.8	3.5	7.3	9.94
	2	10/21/99	< 0.5	<0.5	<0.5	<0.5	0	
		1/19/00	<0.5	<0.5	<0.5	<0.5	0	9.4
	3	10/21/99	<0.5	<0.5	<0.5	<0.5	0	
		1/19/00	<0.5	<0.5	<0.5	< 0.5	0	8.35

1999 GROUNDWATER ANALYTICAL RESULTS

S: / grndwatr/GW-Sites/Fogelson4-1/99Annual.doc

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2709-D Pan American Freeway NE Albuquerque, New Mexico 87107 Phone (505) 344-3777 Fax (505) 344-4413



GAS CHROMATOGRAPHY RESULTS

TEST CLIENT PROJECT # PROJECT I		: EPA 8021 MOD : PHILIP ENVIRO : 21057 : BURLINGTON	ONMENTAL			PINNACLE I.D.	: 905106
SAMPLE				DATE	DATE	DATE	DIL.
ID. #	CLIENT I.D.		MATRIX	SAMPLED	EXTRACTED	ANALYZED	FACTOR
01	BR-TAYLOR M	1W1	AQUEOUS	5/27/99	NA	5/28/99	1
02	BR-FOGELSO	N MW1	AQUEOUS	5/ 27/99	NA	5/28/99	10
PARAMETE BENZENE TOLUENE ETHYLBEN TOTAL XY	IZENE	DET. LIMIT 0.5 0.5 0.5 0.5		UNITS UG/L UG/L UG/L UG/L	BR-TAYLOR MW1 64 < 0.5 23 98	BR-FOGELSON MW1 5.0 < 5.0 210 420	
	TE: OTOLUENE (%) TE LIMITS) (69 - 117)			85	95	

CHEMIST NOTES: N/A

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11 East Olive Road Pensacola, Florida 32514 (850) 474-1001

[0) Page 1
Date 07-Jun-99

"FINAL REPORT FORMAT - SINGLE"

Project Number: 9051 Project Name: PHIL Project Location: BURL	ACLE LABORATOR 06 INGTON DRILLIN p of Single We	IG				
Lab ID: 001 Client Sample Id: 9051	06-01		Sample Date/T Received Date		27-MAY-99 29-MAY-99	1015
Parameters:	Units:	Results:	Rpt Lmts:	Q:	Batch:	Analyst:
CHLORIDE (4500-CL E) NITRITE-NITRATE,	MG/L	45	2		CKW22C	সম
NITROGEN (353.2) SULFATE	MG/L	2.0	0.1		N3W36A	WH
(375.4/4500E/9038) TOTAL DISSOLVED SOLIDS	MG/L	1000	200	+	SEW052	3 2
(160.1)	MG/L	1800	5		TDW027	ED

Comments:

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Date 07-Jun-99

"Method Report Summary"

Accession Number: Client: Project Number: Project Name: Project Location: Test:	905635 PINNACLE LABORATORIES 905106 PHIL BURLINGTON DRILLING Group of Single Wetchem		
Client Sample Id:	Parameter:	Unit:	Result:
905106-01	CHLORIDE (4500-CL E) NITRITE-NITRATE, NITROGEN	MG/L	45
	(353.2) SULFATE (375.4/4500E/9038) TOTAL DISSOLVED SOLIDS (160.1)	MG/L MG/L MG/L	2.0 1000 1800
905106-02	CHLORIDE (4500-CL E) SULFATE (375.4/4500E/9038) TOTAL DISSOLVED SOLIDS (160.1)	MG/L MG/L MG/L	430 9300 14000

SEVERN TRENT LABORATORIES

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11 East Olive Road Pensacola, Florida 32514 (850) 474-1001

[0) Page 1 Date 10-Jun-99

"FINAL REPORT FORMAT - SINGLE"

Accession: Client: Project Number: Project Name: Project Location: Test: Matrix: QC Level:	905635 PINNACLE LABORATORIE 905106 PHIL BURLINGTON DRILLING RCRA METALS - AXIAL WATER I	S			
Lab Id: Client Sample Id:	001 905106-01		Sample Date/Time: Received Date:		1015
Parameters:	Units:	Results:	Rpt Lmts: Q:	Batch:	Analyst:
SILVER (6010B) ARSENIC (6010B) BARIUM (6010B) CADMIUM (6010B) CHROMIUM (6010B) MERCURY (7470A) LEAD (6010B) SELENIUM (6010B)	MG/L MG/L MG/L MG/L MG/L MG/L MG/L	ND ND 0.38 ND 0.008 ND 0.042 ND	0.005 0.005 0.01 0.005 0.005 0.0002 0.005 0.01	AYW154 RYW154 BYW154 CYW154 HYW154 M7W047 PYW154 SYW154	GSP GSP GSP GSP JL GSP GSP

Comments:

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11 East Olive Road Pensacola, Florida 32514 (850) 474-1001

[0) Page 3
Date 10-Jun-99

"Method Report Summary"

Project Name:	905635 PINNACLE LABORATORIES 905106 PHIL BURLINGTON DRILLING RCRA METALS - AXIAL		
Client Sample Id:	Parameter:	Unit:	Result:
905106-01	BARIUM (6010B)	MG/L	0.38
	CHROMIUM (6010B)	MG/L	0.008
	LEAD (6010B)	MG/L	0.042
905105-02	ARSENIC (6010B)	MG/L	0.006
	BARIUM (6010B)	MG/L	0.14
	CHROMIUM (6010B)	MG/L	0.019
	LEAD (6010B)	MG/L	0.007

REQUIRED: YES NO	CLIENT DISCOUNT:		6	TAT-STANDARD RUSHI	DC REQUIRED MS MSD BLANK	510		PROJECT #: 405/06	PROJECT INFORMATION					-02 11	905106-01 527	SAMPLE ID DĄTE	Pinnacle Laboratories, Inc. 2709-D Pan American Freeway, NE Albuquerque, New Mexico 87107 (505) 344-3777 Fax (505) 344-4413 (1/4 G)	Network Project Manager:	Pinnacle Laboratories, Inc.
		S		LAB NUMBER:	Received Good Cond./Cold	Received Intact?	Chain of Custody Seals	Total Number of Containers	SAMPLE RECEIPT					 1215 11 2	1015 AQ 1	TIME MATRIX LABID	ay, NE 107 905-635	Kimberly D. McNeill	
		SEQUOIA	BARRINGER	N. CREEK	STL- NEW JERSEY	STL-CT	PORTLAND - ESL-OR	PENSACOLA - STL-FL	SAMPLES SENT TO:							RCF Meta Meta TOX	2		
Company STL-FL	R.ELSPER IN AN	Signature: 1000	UBT:	ries, Inc.	AN NO 2 00	Punted Name: The Date: 08 99	NWNA	Sighature: - V Time: (700)	RELINQUISHED BY: 1.							Vol: BOI CO PES 827	and Grease atile Organics GC/MS (8260) D		
Company	Printed Name: Date	Signature: Time:	ן אבעבועבע ס ו.	Company		Printed Name: Date:		Signature: Time:	. RELINQUISHED BT: 2							824 Her Bas (625 UR RA Gro TO	A (6310) 40 (TCLP 1311) ZHE tbicides (615/8150) e/Neutral Acid Compounds GC/MS 5/8270) ANIUM DIUM 226+228 DSS Alpha/Beta -14 WBER OF CONTAINERS		

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BLUE ICE(CE) 4C	ACT	Q		SAMPLE RECEIPT	SHIPPED VIA:	P.O. NO.:	PROJ NAME: Burlinston Prilling	PROJ NO: 21057	PROJECT INFORMATION	1 - ming to Sen	PROJECT MANAGER:	Mage Pinnacle La
1.D Pan American Freeway, NE+Albuquerque, Ne				<u></u>	COMMENTS: FIXED FEE [1]	METHANOL PRESERVATION []	CERTIFICATION REQUIRED:	(RUSH) [] 24hr [] 48hr [] 72hr 🗜	PRIOR AUTHORIZATION IS RE	$\frac{1165}{105} \frac{105}{105} \frac{105}{10}$		Pinnacle Laboratories Inc.
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-4413 • E-mail: PIN_LAB@WORLDNET.ATT.NET	Company	Printed Name: Date:	Signature: Time:		See reverse side (Force Magure)	Company:	me. Dale:	P.C. Ime:////	QUISHED B	504.1 EDB / DBCP 8260 (TCL) Volatile Organics 8260 (Full) Volatile Organics 8260 (CUST) Volatile Organics 8260 (Landfill) Volatile Organics 8260	WHIP ANALYSIS REQUEST?	OF
- 🖂 L.I	Pinnacle Laboratories Inc.	Wanchar 10 MV10 5 28 99	Munchal Multi 1010	-		Company.	Printed Name: Date:	Signature:	UISHED BY	Polynuclear Aromatics (610/8310/8270-SIMS) General Chemistry: C1, Sty, No2 TTDS, NO3 Priority Pollutant Metals (13) Target Analyte List Metals (23) X RCRA Metals (8) RCRA Metals by TCLP (Method 1311) Metals: NUMBER OF CONTAINERS	1. South a pressed of the second s	905106

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2709-D Pan American Freeway NE Albuquerque, New Mexico 87107 Phone (505) 344-3777 Fax (505) 344-4413

CLIENT PROJECT # PROJECT NAME	: PHILIP ENVIRONMENTAL : (none) : BURL, DRILLING	PINNACLE ID DATE RECEIVED REPORT DATE	: 909019 : 9/3/99 : 9/14/99
PIN			DATE
	CLIENT DESCRIPTION	MATRIX	COLLECTED
D. # 01	TAYLOR COM #2A MW1	AQUEOUS	8/1/99
02	COZZENS B#1 MW1	AQUEOUS	9/2/99
03	COZZENS B#1 MW2	AQUEOUS	9/2/99

PHERES

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2709-D Pan American Freeway NE Albuquerque, New Mexico 87107 Phone (505) 344-3777 Fax (505) 344-4413

GAS CHROMATOGRAPHY RESULTS

TEST		: EPA 8021 MOD		GRO			
CLIENT		: PHILIP ENVIRO	ONMENTAL			PINNACLE I.D	.: 909019
PROJECT	#	: (none)					
PROJECT	NAME	: BURL. DRILLIN	IG				
SAMPLE				DATE	DATE	DATE	DIL.
ID.#	CLIENT I.D.		MATRIX	SAMPLED	EXTRACTED	ANALYZED	FACTOR
01	TAYLOR COM	#2A MW1	AQUEOUS	9/1/99	NA	9/9/99	1
02	COZZENS B#1		AQUEOUS	9/2/99	NA	9/10/99	1
03	COZZENS B#1		AQUEOUS	9/2/99	NA	8/9/99	100
PARAMET		DET. LIMIT		ITS	TAYLOR COM	COZZENS B#1 MW1	COZZENS B#1 MW2
	ROCARBONS	50		3/L	120	930	11000
	RBON RANGE	00			C6-C14	C6-C14	C6-C14
	ARBONS QUANT	TATED USING			GASOLINE	GASOLINE	GASOLINE
BENZENE		0.5	U	GAL	< 0.5	2.5	120
TOLUENE		0.5		G/L	< 0.5	2.1	55
ETHYLBE		0.5		3/L	1.3	5.6	440
TOTALX		0.5		G/L	1.6	22	450
	BUTYL ETHER	2.5		G/L	< 2.5	< 2.5	< 250
SURROG	ATE:						
BROMOF	LUOROBENZENI ATE LIMITS	E (%) (80 - 120)			1 04	114	88

CHEMIST NOTES: N/A

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mpie C	Contai	iners				Cleasr Giada Cl; N ≈ H								O = Other (Spacify) ≈ None
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2709-D Pan American Freeway NE Albuquerque, New Mexico 87107 Phone (505) 344-3777 Fax (505) 344-4413

GAS CHROMATOGRAPHY RESULTS

TEST CLIENT PROJECT PROJECT		: EPA 8021 MOE : PHILIP ENVIRO : 62800086 : BURLINGTON	ONMENTAL			PINNACLE I.I	D.: 910079
SAMPLE				DATE	DATE	DATE	DIL.
ID. #	CLIENT I.D.		MATRIX	SAMPLED	EXTRACTED	ANALYZED	FACTOR
01	TAYLOR MW-1		AQUEOUS	10/21/99	NA	10/26/99	1
02	TAYLOR MW-2	2	AQUEOUS	10/21/99	NA	10/26/99	1
03	TAYLOR MW-3	3	AQUEOUS	10/21/99	NA	10/26/99	1
PARAMET	ER	DET. LIMIT		UNITS	TAYLOR MW-1	TAYLOR MW-2	TAYLOR MW-3
BENZENE		0.5		UG/L	0.7	< 0.5	< 0.5
TOLUENE		0.5		UG/L	1.9	< 0.5	< 0.5
ETHYLBE	NZENE	0.5		UG/L	1.2	< 0.5	< 0.5
TOTAL XY	LENES	0.5		UG/L	3.5	< 0.5	< 0.5
	ATE: .UOROBENZENE ATE LIMITS	E (%) (80 - 120)			106	98	102

CHEMIST NOTES: N/A

	Chain of	Chain of Custody Record	kecord		
ENVIRONMENTAL	4000 Monroe Road Farmington, NM 87401		(505) 326-2262 Phone (505) 326-2388 FAX	coc serial No. C	2401
Project Name BULLING-TON Dri Project Number 62800086Phase. Task Samplers C. CULLICOT	Drilling Task	Type of Bottles Amalysis and Bottle			
Laboratory Name どうへんのこと- Location 内人しづみした(シリテ Samole Number (and depth) Date Time	イー・ イーシンテ Time Matrix	Total Nun			Comments
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12/01	5:55pm 4	→ → →			2 N
Relinquished by:			Received By:		
Signature		Time	Signature	Dat	-
Cathy Cullrot	10/22/99	4am	Amphill JUS	10/22/99	9 1800
Samples Iced: 📈 Yes 🗆 No	Carrier: (C-REYMOUND	N Q	Airbili No. GL	FLI1606650265
Y for Water Samp	Shipping and	and Lab Notes:	3,6°C		
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Other (Specify)					

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DRILLING LOGS/WELLBORE DIAGRAMS

S: / grndwatr/GW-Sites/Fogelson4-1/99Annual.doc

add 32522 AL MR 136226 Bendfall Caston Table All WS 17 All WS 18 All W	RECORD OF SU Phillp Environmental 3000 Marrae Road Ferminaton, New Maxiao	IBSUR Service 87401	FĄС£ в Согр.	DO AM 10:25 ID:PHILIP SERVICES	Project Ny Project Ny	(1)4	BURLING Pho	TIN DRILLING
Defin Device The average Samuel Considered UPER Construction UPER Construction Device Construction	Elevation Borehole Location GWL Depth Logged By (Drilled By Date/Time Started	T30 3 1- (1- P	N 12 161 ULLI ADILI	(0:TT A Q O PADILLA 19 (0:303m	Project La Well Logg Personal Contreato Client Per Drilling M	eation On-Bits Ins On-Site sonnel On-Si ethod	TAYIUR C. CU HE PAC	CON HEZA LLUNTT DILLA D. PADILIA, R. THOMPSO FFF 5:
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		۱۵ * ۱(‡		BELCICE LE ATER TABLE UPPER 17" - BROWN TOMETT GREYLLAYEY SAND LESSINGTODOR CIFULL RECOURTY SANDICLEAN HITT COBBLES (213)				Si 0.0 ppm HS 0.0 ppm E: 4 BLOUS Si 0.0 ppm HS 0.0 ppm
	Commente:							

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Cathy

IONITORING WELL INST.	ALLATION RECO	RD			Barahale # Well #	
hillip Eavironmental Services Corp.					Page 2	01
wington, New Medico 87401			Project	Neme	BURLIN	16TON DR
116) 328-2243 FAX (606) 378-2389				l Number L Location	62800086 TAYLOR	
WL Depth <u>3.966</u> Installed By <u>15.9401111</u>	199 (0:30a		Person Contrac	s Geologia Inel On-Sit Ictors On-S Personnel	site R	EFF 5
Depths in Reference to Ground S	uriace		 	Top of Pro	tective Casing	
	7			Top of File		
ltem	Material	Depth		Ground Su	HIACA	
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Boitom of Protective Casing						
Casing Bottom of Permanent Borehole Casing						
Top of Concrete						
Bottom of Concrete						
Top of Grout						
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Top of Well Riser	2."	65				
Bottom of Well Riser	2"	5'				
Top of Well Screen	2"	.5'		Top of Sa	al	6.5
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Top of Peltonite Seal	BENT	65	poxo poxo	T .		- ? '
Bottom of Peltonite Seal	Chips			Top of Gr		<u> </u>
Top of Gravel Pack	<u>co</u>	3'		Top of Sc	1931	<u>;</u> ,
Bottom of Gravel Paok	SAND	15'				
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Bottom of Natural Cave-In	· · · · · · · · · · · · · · · · · · ·					
		3.96'		Bottom of		15
Top of Groundwater		151		Bottom of	boration	1~

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Elevetion Borehole Location T30 ALLA + O.P.4 DILLA									2 <u>m.u.3</u> 1 of 2
									M 35
					Well Logged By C Personnel On-Site Contracture On-Site Contracture On-Site Client Personnel On-Site			EULLIGITI E PADILLA, D. PAUL B R. T. MOWN	
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FAX:505 326 2388

ONITORING WELL INST	ALLATION RECOI	RD				Borehole		_
allip Environmental Services Corp	₩ 6.5.546.4		يتهيه الهادين	į.	•	. Well # P≞ge	2 or 2	
100 Marvee Read				_ .				
rmindtm, New Mexico 87401 UBJ 325-2762 FAX (606) 326-2380				Proje	ot Name	001-22	RILLING	
					ct Number (, 2 ct Location	100086	Phase 35 1 Com #21	- 5
Jevation				On-S	ite Geologist	CCI	ULLICETT	
Vell Location T30N P	-11W 517.4				onnel On-Site rectors On-Site	E.P!	+-011LA.0	PADILLAY Trigmisson
WL Depth - 2:56	LA T				it Personnel On	f	Ø	
0.01	101LLA				, `			
Date/Time Started <u>LO / 14</u> Date/Time Completed <u>LO / 14</u>	99 11:309 m 99 12:30pm							
Depths in Retarence to Ground S	Gurface			=	Top of Protec	tive Casing	······································	1
					Top of Filser Ground Surfa			
ltern	Material	Depth			Ground Sune	109		
Top of Protective Casing								
Bottom of Protective Casing								
Top of Permanent Borehole Casing								
Bottom of Permanent Borshole Casing								
Top of Concrete								
Bottom of Concrete								T.
Top of Grout								
Battori of Grain				}				
Top of Well Riser	2"	65						
Bottom of Well Riser	2"	5						
Top of Well Screen	2."	5') xxx	Top of Sual		65	
Bottem of Well Screen	2."	15"		∞				ł
Top of Peltonite Seal	BENT.	GS					יצ'	
Bottom of Peltonite Seal	CHIPS	3'		XXX		-	<u> </u>	
Top of Gravel Pack	<u> </u>	3			Top of Scre	au	<u>_}</u>	
Bottom of Gravel Pack	SAND	15'						
Top of Natural Cave-In		_ _						
Bottom of Natural Cave-In								1
Top of Groundwater		356			Bottom of S Bottom of B		15	
Total Depth of Sorehole		15						
Comments: WELL DEL	A Bailine 3	7 03 0 651 7	allows Re	une	ured		(
well is goe water us u with Brou	od producer	1	Geologist Signat		Car	Huy C.	ullis &	4
water in	reny turbic)				0		
With Brok	un sedeme	nt.						
nin miniterer	-henro	yan						

LETTER TO MR. OLSON DATED AUGUST 13, 1999

S: / grndwatr/GW-Sites/Fogelson4-1/99Annual.doc

Certified Mail: Z 186 732 850



SAN JUAN DIVISION

August 13, 1999

Bill Olson New Mexico Oil Conservation Division 2040 S. Pacheco Santa Fe, NM 87505

RE: Taylor Com. #2A Unit Letter A, Section 17, Township 30N, Range 11W Notification of Groundwater above Benzene Standard

Dear Mr. Olson:

As a follow-up to the E-mail dated July 30, 1999, this letter is Burlington Resources' (BR) notification of groundwater that exceeded the benzene standard at the subject location. All other BTEX constituents were below the standards, but benzene was over 10 uG/L. BR is also proposing a plan of action to address the groundwater concerns at the Taylor Com. #2A.

During a spill cleanup on the subject location, BR excavated into an apparent abandoned earthen pit. As the excavation of impacted soils continued, groundwater was encountered at approximately 9 feet below ground surface. Impacted soils continued to be excavated to the extent practical until the "core" of impacted soils had been removed (approximate depth of 12 ft.). The excavation was backfilled with clean fill. BR then installed a temporary groundwater monitoring well in the center of the former earthen pit on May 19, 1999. After developing the well and allowing it to stabilize for one week, the well was purged and sampled on May 27, 1999. The sample results are as follows:

	Lab Results (uG/L)	Standard (uG/L)
Benzene	64	10
Toluene	<0.5	750
Ethylbenzene	23	750
Total Xylenes	98	640

Included with this letter are the groundwater lab analysis, the drilling log, and the monitoring well installation record.

Plan of Action:

BR proposes to complete the existing temporary monitoring well as the permanent source well and proceed with quarterly sampling for BTEX constituents. Due to the shallow depth of the groundwater, the relatively low contaminant level, and apparent groundwater flow direction (toward the Animas River), we feel additional monitoring wells are not justified at this time. If the sampling shows the water is below standards for 4 consecutive quarters, BR proposes no additional investigation/remediation work at this site. The 2-inch PVC casing would be removed to the extent practical from the monitoring well and the wellbore would be filled to surface with a bentonite/cement grout.

If after four quarters of sampling, the source monitoring well continues to test above standards, BR will initiate additional investigation work including possible downgradient wells and soil borings to identify the extent of the impact and potential additional sources.

Please provide written correspondence concerning our proposed plan of action. If you have questions or additional information is needed, please contact me at (505) 326-9841.

Sincerely,

()tore)

Ed Hasely Sr. Staff Environmental Representative

Attachments: Drilling Log/Wellbore Diagram Analytical Results

cc:

Denny Foust - NMOCD Aztec Johnny Ellis (letter only) Bruce Gantner (letter only) Facility File # Correspondence Drilling Log/Wellbore Diagram

RECORD OF SUBSURFACE EXPLORATION

 Philip Environmental Services Corp.

 4000 Monroe Road

 Farmington, New Mexico 87401

 (505) 326-2262
 FAX (505) 326-2388

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Elevation	
Borehole Location Taylor	
GWL Depth $\epsilon^{\prime l}$	_
Logged By P. Chanay	_
Drilled By K. Pauling	-
Date/Time Started 5/19 /113	_
Date/Time Completed 5/19	-

Project Name			
Project Number	21073	Phase	1000.19
Project Location	Taylor		``````````````````````````````````````
Well Logged By Personnei On-Site Contractors On-Site	P. Ch. Cheney	eney , K.Pau	Ella, D. Padilly
Client Personnel On-	Site	ES 1ha	sely
Drilling Method Air Monitoring Meth	4/h, " odPI	1JSA 0	

Borehole # Well #

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Depth (Feet)	Sample Intervel	Sample Type & Recovery (inches)	Sample Description Classification System: USCS	USCS Symbol	Depth Lithology Change (feet)		Monitoring nits: NDU BH	-	Drilling Conditions & Blow Counts
	5 7 10 12	(inches)	Pit excavated and hack filled to ~ 12' (Ed Ibisely), 1st sample at 5-7' brown silly clay w/ black staining, soft, moduate plasticity wet at ~ 9' Dark gray to black, fire graind silty sand, poorly sorted, the odor coarse grained, well sorred sand TD = 15' set 10' of 2'' screen from 15' to 5', silica sand to 3', penionite to ground surface	5711001	-		ВН /	s 1, 5 1, 4	BC= 3 s/15 = 87.0 BC= 2 s/15 = 2.15.0 BC= 5 (4)") s/15 : Not enough Sumptik To log anul hag
Comments:	Mate	mals	1 silt trap, 1-10' screen	,]-	5'r.	ser ,	4 5	uck	5 Silica Sand

Geologist Signature

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ONITORING WELL INST		ECORD			Weil #
00 Monroe Rowd					Page of
mington, New Mexico 87401 061 325-2262 - FAX (505) 326-2388				Project Name	
0, 020, 220, 220, 200, 320, 2308				· <u>* 1</u>	273 Phase 1000.9
evation				On-Site Geologist	P. Cheney,
ell Location <u>Taylor</u> WL Depth <u>~ 91</u>				Personnel On-Site Contractors On-Site	cheney, Perdilla D. Paul
stailed By R. Padilly				Client Personnel On-S	te Ed plasely
ate/Time Started 5/14	1113				
ate/Time Completed 5/14					
	· · ·				
Depths in Reference to Ground S	Surface			Top of Protective Top of Riser	
ltam	Materiai	Depth		Ground Surface	
Top of Protective Casing					
Sottom of Protective Casing					
Top of Permanent Sorehole Casing					
Bottom of Permanent Borehole					
Casing	<u> </u>				
Top of Concrete		KA.			
Bottom of Concrete		N.A			
Top of Grout	1	N.H.			
Bottom of Grout		N.A			
Top of Weil Riser		6-mind Survey	-		
Sottom of Weil Riser		51			
Top of Well Screen		51		Top of Seal	Ground Susface
Bottom of Well Screen		15'			Surface
Top of Peitonite Seal		Ground	xx xx	xxx xxx	1
Bottom of Peitonite Seal		31	xx	XXX Top of Gravel F	Pack <u>3</u>
Top of Gravel Pack		3'		Top of Screen	
Bottom of Gravel Pack		15'			
Top of Natural Cave-in		N.A.			
Bottom of Natural Cave-In		N.A			
Top of Groundwater		91		Bottom of Scre	
Total Depth of Borehole		151		Bottom of Bore	hole <u>15'</u>
mments: Materials ! /	silt man	1-10' screen	1-5'ri	ser 4 curts	cilica sunt

Analytical Results - Groundwater



2709-D Pan American Freeway NE Albuquerque, New Mexico 87107 Phone (505) 344-3777 Fax (505) 344-4413

Pinnacle Lab ID number June 14, 1999 905106

PHILIP ENVIRONMENTAL 4000 MONROE ROAD FARMINGTON, NM 87401

Project NameBURLINGTON DRILLINGProject Number21057

Attention: PAUL CHENEY

On 5/28/99 Pinnacle Laboratories, Inc. Inc., (ADHS License No. AZ0592), received a request to analyze **aqueous** samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

EPA method 8021 was performed by Pinnacle Laboratories, Inc., Albuquerque, NM.

All other parameters were performed by Severn Trent (FL) Inc., Pensacola, FL.

If you have any questions or comments, please do not hesitate to contact us at (505)344-3777.

Knak

Kimberly D. McNeill Project Manager

MR: mt

Enclosure

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H. Mitchell Rubenstein, Ph. D. General Manager



2709-D Pan American Freeway NE Albuquerque, New Mexico 87107 Phone (505) 344-3777 Fax (505) 344-4413

CLIENT	: PHILIP ENVIRONMENTAL	PINNACLE ID	: 905106
PROJECT #	: 21057	DATE RECEIVED	: 5/28/99
PROJECT NAME	: BURLINGTON DRILLING	REPORT DATE	: 6/14/99
PIN			DATE
ID. #	CLIENT DESCRIPTION	MATRIX	COLLECTED
01	BR-TAYLOR MW1	AQUEOUS	5/27/99
02	BR-FOGELSON MW1	AQUEOUS	5/27/99

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2709-D Pan American Freeway NE Albuquerque, New Mexico 87107 Phone (505) 344-3777 Fax (505) 344-4413

GAS CHROMATOGRAPHY RESULTS

TEST CLIENT PROJECT PROJECT		: EPA 8021 MOI : PHILIP ENVIR : 21057 : BURLINGTON	ONMENTAL			PINNACLE I.D	.: 905106
SAMPLE				DATE	DATE	DATE	DIL.
ID. #	CLIENT I.D.		MATRIX	SAMPLED	EXTRACTED	ANALYZED	FACTOR
01	BR-TAYLOR M	IW1	AQUEOUS	5/27/99	NA	5/28/99	1
02	BR-FOGELSO	N MW1	AQUEOUS	5/27/99	NA	5/28/99	10
PARAMET	ER	DET. LIMIT		UNITS	BR-TAYLOR MW1	BR-FOGELSON MW1	
BENZENE		0.5		UG/L	64	5.0	
TOLUENE		0.5		UG/L	-	< 5.0	
ETHYLBE	NZENE	0.5		UG/L	23	210	
TOTAL XY	LENES	0.5		UG/L	98	420	
	ATE: ROTOLUENE (%) ATE LIMITS	(69 - 117)			85	95	

CHEMIST NOTES:

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N/A



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2709-D Pan American Freeway NE Albuquerque, New Mexico 87107 Phone (505) 344-3777 Fax (505) 344-4413

GAS CHROMATOGRAPHY RESULTS REAGENT BLANK

TEST BLANK I. D. CLIENT PROJECT # PROJECT NAME	: EPA 8021 MODIFIED : 052899 : PHILIP ENVIRONMENTAL : 21057 : BURLINGTON DRILLING	PINNACLE I.D. DATE EXTRACTED DATE ANALYZED SAMPLE MATRIX	: 905106 : NA : 5/28/99 : AQUEOUS
PARAMETER	UNITS		
BENZENE	UG/L	<0.5	
TOLUENE	UG/L	<0.5	
ETHYLBENZENE	UG/L	<0.5	
TOTAL XYLENES	UG/L	<0.5	
SURROGATE: TRIFLUOROTOLEUEN (%) SURROGATE LIMITS: CHEMIST NOTES: N/A	(69 - 117)	100	



2709-D Pan American Freeway NE Albuquerque, New Mexico 87107 Phone (505) 344-3777 Fax (505) 344-4413

GAS CHROMATOGRAPHY QUALITY CONTROL MSMSD

TEST	: EPA 8021 MC	DDIFIED							
MSMSD #	: 905111-01				PINNACLE	.D.	:	905106	
CLIENT	: PHILIP ENVI	RONMENTA	AL.		DATE EXTR	ACTED	:	NA	
PROJECT #	: 21057	DATE ANALYZED		:	5/28/99				
PROJECT NAME	: BURLINGTON DRILLING				SAMPLE MATRIX			AQUEOUS	
					UNITS		:	UG/L	
<u> </u>	SAMPLE	CONC	SPIKED	%	DUP	DUP		REC	RPD
PARAMETER	RESULT	SPIKE	SAMPLE	REC	SPIKE	% REC	RPD	LIMITS	LIMITS
BENZENE	<0.5	10.0	10.1	101	10.5	105	4	(80-120)	20
TOLUENE	<0.5	10.0	10.5	105	10.5	105	0	(80 - 120)	20
ETHYLBENZENE	<0.5	10.0	10.8	108	10.8	108	0	(80-120)	20
TOTAL XYLENES	<0.5	30.0	32.2	107	32.0	107	1	(80 - 120)	20

CHEMIST NOTES:

N/A

(Spike Sample	Result - Samp	e Result)
---------------	---------------	-----------

% Recovery =

----- X 100

Spike Concentration

(Sample Result - Duplicate Result) ------ X 100

RPD (Relative Percent Difference) =

Average Result



Severn Trent Laboratories 11 East Olive Road Pensacola FL 32514

Tel: (850) 474-1001 Fax: (850) 478-2671

Reviewed by:

n STL Project Manager

Client:

PINNACLE LABORATORIES ALBUQUERQUE, NEW MEXICO

SIGNATURE PAGE

Project Name:	PHIL
Project Number:	905106
Project Location:	BURLINGTON DRILLING
Accession Number:	905635
Project Manager:	KIMBERLY D. MCNEILL
Sampled By:	N/S

Other Laboratory Locations:

149 Rangeway Road, North Bilerica MA 01862
16203 Mark Row, Suite 110, Houston TX 77084
200 Markoe Tumpike, Morroe CT 06468
55 South Park Drive, Colchester VT 05446

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315 Fullenton Avenue, Newburgh NY 12550
Westfield Executive Park, 53 Scuthampton Road, Westfield MA 01085
628 Route 10, Whippany NY 07981
77 New Durham Road, Edison NJ 08817

SEVERN TRENT LABORATORIES, INC. – PENSACOLA, FLORIDA STATE CERTIFICATIONS

Atabainformerication of the second Arizona Department of Health Services, Lab ID No. AZ0589 (Hazardous Waste & Wastewater) Arkansas Department of Pollution Control and Ecology, (No Laboratory ID No. assigned by state) (Environmental) State of California, Department of Health Services, Laboratory ID No. 2338 (Hazardous Waste and Wastewater) State of Connecticut, Department of Health Services, Connecticut Lab Approval No. PH-0697 (Drinking Water, Hazardous Waste and Wastewater) Delaware Health & Social Services, Division of Public Health, Laboratory ID No. FL094 (Drinking Water by Reciprocity with FL) Florida DOH Laboratory ID No. 81142 (Drinking Water), Laboratory ID No. E81010 (Hazardous Waste and Wastewater) Florida, Radioactive Materials License No. G0733-1 Foreign Soil Permit, Permit No. S-37599 Kausas Department of Health & Environment, Laboratory ID No. E10253 (Wastewater and Hazardous Waste) Commonwealth of Kentucky, Natural Resources and Environmental Protection Cabinet, Laboratory ID No. 90043 (Drinking Water) State of Louisiana, DHH, Office of Public Health Division of Laboratories, Laboratory ID No. 98-25 (Drinking Water) State of Maryland, DH&MH Laboratory ID No. 233 (Drinking Water by Reciprocity with Florida) Commonwealth of Massachusetts, DEP, Laboratory ID No. M-FL094 (Hazardous Waste and Wastewater) State of Michigan, Bureau of E&OccH, Laboratory ID No.9912 (Drinking Water by Reciprocity with Florida) New Hampshire DES, Laboratory ID No. 250598-A (Wastewater) State of New Jersey, Department of Environmental Protection & Energy, Laboratory ID No. 49006 (Wastewate and Hazardous Waster) New York State, Department of Health, Laboratory ID No. 11503 (Wastewater and Solids/Hazardous Waste) North Carolina Department of Environment, Health, & Natural Resources, Laboratory ID No. 314 (Hazardous Waste and Wastewater) North Dakota DH&Consol Labs, Laboratory ID No. R-108 (Hazardous Waste and Wastewater by Reciprocity with Florida) State of Oklahoma, Oklahoma Department of Environmental Quality, Laboratory ID No. 9810 (Hazardous Waste and Wastewater) Commonwealth of Pennsylvania, Department of Environmental Resources, Laboratory ID No. 68-467 (Drinking Water) South Carolina DH&EC, Laboratory ID No. 96026 (Wastewater by Reciprocity with FL and Solids/Hazardous Waste by Reciprocity with CA) Tennessee Department of Health & Environment, Laboratory ID No. 02907 (Drinking Water) Tennessee Division of Underground Storage Tanks Approved Laboratory Virginia Department of General Services, Laboratory ID No. 00008 (Drinking Water by Reciprocity with FL) State of Washington, Department of Ecology, Laboratory ID No. C282 (Hazardous Waste and Wastewater) West Virginia Division of Environmental Protection, Office of Water Resources, Laboratory ID No. 136 (Hazardous Waste and Wastewater by Reciprocity with FL)

American Industrial Hygiene Association (AIHA) Accredited Laboratory, Laboratory ID No. 9133

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Analysis Report

Analysis: Group of Single Wetchem

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Accession: Client: Project Number: Project Name: Project Location: Department:

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905635 PINNACLE LABORATORIES 905106 PHIL BURLINGTON DRILLING WET CHEM 11 🖌 🌶

[0) Page 1 Date 07-Jun-99

"FINAL REPORT FORMAT - SINGLE"

Accession: Client: Project Number: Project Name: Project Location: Test: Matrix: QC Level:	905106 PHIL BURLING	E LABORATORIE TON DRILLING f Single Wetc						
Lab ID: Client Sample Id:	001 905106-	01			e Date/Ti ved Date:		27-MAY-99 29-MAY-99	1015
Parameters:		Units:	Results:	Rpt	Lmts:	Q:	Batch:	Analyst:
CHLORIDE (4500-CL	E)	MG/L	45	2			CKW22C	WH
NITRITE-NITRATE, NITROGEN (353.2) SULFATE (375.4/4500E/9038)		MG/L	2.0	0.1	`		N3W36A	WH
		MG/L	1000	200		+	SEW052	BE
TOTAL DISSOLVED S (160.1)	SULTO	MG/L	1800	5			TDW027	ED

Comments:

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Taylor Com #2A

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SEVERN TRENT LABORATORIES

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[0) Page 2 Date 07-Jun-99

"FINAL REPORT FORMAT - SINGLE"

Accession: Client: Project Number: Project Name: Project Location: Test: Matrix: QC Level:	905106 PHIL BURLING	PINNACLE LABORATORIES 905106 PHIL BURLINGTON DRILLING Group of Single Wetchem						
Lab ID: Client Sample Id:	002 905106-	02	S	Sample Date/Tin Received Date:	ne:	27-MAY-99 29-MAY-99	1215	
Parameters:		Units:	Results:	Rpt Lmts:	Q:	Batch:	Analyst:	
CHLORIDE (4500-CL	E)	MG/L	430	10	+	CKW22C	WH	
NITRITE-NITRATE, NITROGEN (353.2)		MG/L	ND	0.1		N3W36A	WH	
SULFATE (375.4/4500E/9038)		MG/L	9300	2000	+	SEW052	BE	
TOTAL DISSOLVED S((160.1)	20172	MG/L	14000	5		TDW027	ED	

Comments:

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[0) Page 3 Date 07-Jun-99

"Method Report Summary"

Project Number:	PINNACLE LABORATORIES		
Client Sample Id:	Parameter:	Unit:	Result:
905106-01	CHLORIDE (4500-CL E) NITRITE-NITRATE, NITROGEN	MG/L	45
	(353.2) SULFATE (375.4/4500E/9038) TOTAL DISSOLVED SOLIDS (160.1)	MG/L MG/L MG/L	2.0 1000 1800
905106-02	CHLORIDE (4500-CL E) SULFATE (375.4/4500E/9038) TOTAL DISSOLVED SOLIDS (160.1)	MG/L MG/L MG/L	430 9300 14000

SEVERN TRENT LABORATORIES

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Analysis Report

Analysis: RCRA METALS - AXIAL

Accession:905635Client:PINNACLE LABORATORIESProject Number:905106Project Name:PHILProject Location:BURLINGTON DRILLINGDepartment:METALS

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[0) Page 1 Date 10-Jun-99

Analyst:

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"FINAL REPORT FORMAT - SINGLE"

Accession: Client: Project Number: Project Name: Project Location: Test: Matrix: QC Level:	905635 PINNACLE LABORATORIES 905106 PHIL BURLINGTON DRILLING RCRA METALS - AXIAL WATER I									
Lab Id: Client Sample Id:	001 905106-01		Sample Date/Time: Received Date:		1015					
Parameters:	Units:	Results:	Rpt Lmts: Q:	Batch:	Analy					
SILVER (6010B) ARSENIC (6010B) BARIUM (6010B) CADMIUM (6010B) CHROMIUM (6010B) MERCURY (7470A) LEAD (6010B) SELENIUM (6010B)	MG/L MG/L MG/L MG/L MG/L MG/L MG/L	ND ND 0.38 ND 0.008 ND 0.042 ND	0.005 0.005 0.01 0.005 0.005 0.0002 0.005 0.01	AYW154 RYW154 BYW154 CYW154 HYW154 M7W047 PYW154 SYW154	GSP GSP GSP GSP JL GSP GSP					

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Comments:

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[0) Page 2 Date 10-Jun-99

Analyst:

GSP

GSP

PYW154

SYW154

"FINAL REPORT FORMAT - SINGLE"

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ND

Accession: Client: Project Number: Project Name: Project Location: Test: Matrix: QC Level:	905635 PINNACLE LABORATOR: 905106 PHIL BURLINGTON DRILLING RCRA METALS - AXIAI WATER I	5					
Lab Id: Client Sample Id:	002 905106-02		Sample Date/Time: Received Date:			1215	
Parameters:	Units:	Results:	Rpt Lmts:	Q:	Batch:	Analys	
SILVER (6010B) ARSENIC (6010B) BARIUM (6010B) CADMIUM (6010B) CHROMIUM (6010B) MERCURY (7470A)	MG/L MG/L MG/L MG/L MG/L MG/L	ND 0.006 0.14 ND 0.019 ND	0.005 0.005 0.01 0.005 0.005 0.005 0.0002		AYW154 RYW154 BYW154 CYW154 HYW154 M7W047	GSP GSP GSP GSP JL	

MG/L

MG/L

Comments:

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LEAD (6010B) SELENIUM (6010B)

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[0) Page 3 Date 10-Jun-99

"Method Report Summary"

Accession Number: 9056 Client: PINN Project Number: 9051 Project Name: PHII Project Location: BURI Test: RCRA	ACLE LABORATORIES 06		
Client Sample Id:	Parameter:	Unit:	Result:
905106-01	BARIUM (6010B)	MG/L	0.38
	CHROMIUM (6010B)	MG/L	0.008
	LEAD (6010B)	MG/L	0.042
905106-02	ARSENIC (6010B)	MG/L	0.006
	BARIUM (6010B)	MG/L	0.14
	CHROMIUM (6010B)	MG/L	0.019
	LEAD (6010B)	MG/L	0.007



(850) 474-1001

Data Qualifiers for Final Report

STL-Pensacola Inorganic/Organic and AFCEE Projects (under QAPP)

STL-Pensacola Inorgani	c/Organic and AFCEE Proje (For positive results)	<u>ects (under QAPP)</u> Temperature limits exce	adad (200 ar > 6°C)						
J5			antitated as a TIC; therefor						
	(TICs)								
J6 J7	(For positive results)			r < lower control limit (LCL)					
J7	(For positive results)	therefore, the quantitation	ne laboratory MDL and < low	vest calibration standards;					
J (AFCEE description)	The applyte was positive	y identified, the quantitation							
R1	(For nondetects)	Temperature limits exce							
R2	· ·	preservative present in sa							
R3		correct preservative present in sa							
R4		conect preservative presen	cin sample upon receipt						
R5	Holding time exceeded	ot met, improper container	used for especie						
R6	•		ected or surrogate %R is < 1	10% for detects (see detects					
R7									
R8		Internal standard area outside –50% to +100% of initial calibration midpoint standard. Second source calibration verification exceeds acceptance criteria.							
R9		•							
R (AFCEE description)	Improper preservation, sample not filtered in the field. The data are unusable due to deficiencies in the ability to analyze the sample and meet QC criteria								
F	A laboratory or AFCEE RL and > laboratory MDL								
F (AFCEE description)	The analyte was positively identified but the associated numerical value is below the AFCEE or lab RL								
U2	•	for result will be the MDL, r							
U (AFCEE description)			associated numerical value	is at or below the MDI					
B (AFCEE description)		the associated blank, as w							
@			on prior to digestion and/or	analysis)					
+		lue to dilution into calibration							
•			dilution prior to digestion an	d/or analysis)					
#	· -	ue to insufficient sample s	• •	, , , , , , , , , , , , , , , , , , ,					
D	Diluted out								
Μ	A matrix effect was pres	ent (sample was analyzed	twice to confirm or chromate	ogram had interfering peaks)					
S		t was submitted to the labo							
Т	Second-column confirma	ation exceeded the SW-846	Scriteria of 40% RPD for thi	s compound.					
ND = Not Detected at or	above the STL-Pensacola	reporting limit (RL)	N/S = Not Submitted	N/A = Not Applicable					
IDL = Laboratory Instrum			MDL = Laboratory Metho	d Detection Limit					
RL = Reporting Limit (AF	CEE RLs are listed in the Af	FCEE QAPP)							

<u>Any time</u> a sample arrives at the laboratory improperly preserved (at improper pH or temperature) or after holding time has expired or prepared or analyzed after holding time, client must be notified in writing (i.e. case narrative)

Florida Projects Inorganic/Organic Refer to back side of this page

 ICR Projects Inorganic/Organic_

 A1
 Acceptable
 R6

 Examples: ICR Flags
 ICR Flags

R6 = Laboratory extracted the sample but the refrigerator malfunctioned so the extract became warm and client was notified

R6 = Sample arrived in laboratory in good condition; however, the laboratory did not analyze it within EPA's established holding time limit.

Rejected

CLP and CLP-like Projects: Refer to referenced CLP Statement of Work (SOW) for explanation of data qualifiers

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Quality Control Report

Analysis: Group of Single Wetchem

Accession: Client: Project Number: Project Name: Project Location: Department: 905635 PINNACLE LABORATORIES 905106 PHIL BURLINGTON DRILLING WET CHEM

SEVERN TRENT LABORATORIES

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 [0) Page 1 Date 07-Jun-99

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Parameter: Batch Id: Blank Result: Anal. Method: Prep. Method: Analysis Date: Prep. Date:	CHLORIDE CKW22C <2 CL4500E N/A 02-JUN-99 01-JUN-99	"WetChem NO2NO3 N3W36A <0.1 353.2 N/A 07-JUN-99 01-JUN-99	Quality Con SULFATE SEW052 <5 375.4 N/A 02-JUN-99 02-JUN-99	trol Report" TDS TDW027 <5 160.1 N/A 03-JUN-99 02-JUN-99							
Sample Duplication											
Sample Dup: Rept Limit:	905608-10 <2	905611-1 <0.1	905608-9 <5	905635-1 <5							
Sample Result: Dup Result: Sample RPD: Max RPD: Dry Weight%	48.4 48.4 0 20 N/A	<0.1 <0.1 N/C 0.1 N/A	19 19 0 G 5 N/A	1794 1856 3 17 N/A							
Matrix Spike											
Sample Spiked: Rept Limit:	905608-10 <2	905611-1 <0.1	905608-9 <5	N/A N/A							
Sample Result: Spiked Result: Spike Added: % Recovery: % Rec Limits: Dry Weight%	48.4 73.4 25.0 100 79-132 N/A	<0.1 0.97 1.00 97 71-123 N/A	19 38 20 95 61-138 N/A								
ICV	······································										
ICV Result: True Result: % Recovery: % Rec Limits:	50.2 50.0 100 90-110	1.94 2.00 97 90-110	20 20 100 90-110								
LCS											
LCS Result: True Result: % Recovery: % Rec Limits:				296 293 101 73-125							

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[0) Page 2 Date 07-Jun-99

"Quality Control Comments"

Batch Id: Comments:

TDW027 906013-1,2,3,4,5,6,7,8,9,10 were added to batch on 03-Jun-99 TDW027 906043-1,2,3 were added to batch on 04-Jun-99

[0) Page_3 Date 07-Jun-99 ---- Common Footnotes WetChem -----N/A = NOT APPLICABLE.N/S = NOT SUBMITTED. N/C = SAMPLE AND DUPLICATE RESULTS ARE AT OR BELOW STL REPORTING LIMIT; THEREFORE, THE RPD IS "NOT CALCULABLE" AND NO CONTROL LIMITS APPLY. N/D = NOT DETECTED AT OR ABOVE THE STL-PENSACOLA REPORTING LIMIT (RL). R = REACTIVET = TOTALG = SAMPLE AND/OR DUPLICATE RESULT IS BELOW 5 X STL REPORTING LIMIT AND THE ABSOLUTE DIFFERENCE BETWEEN THE SAMPLE AND DUPLICATE RESULT IS AT OR BELOW STL REPORTING LIMIT; THEREFORE, THE RESULTS ARE "IN CONTROL".
Q = THE ANALYTICAL (POST-DISTILLATION) SPIKE IS REPORTED DUE TO PERCENT RECOVERY
BEING OUTSIDE ACCEPTANCE LIMITS ON THE MATRIX (PRE-DISTILLATION) SPIKE.
= ELEVATED REPORTING LIMIT DUE TO INSUFFICIENT SAMPLE.
+ = ELEVATED REPORTING LIMIT DUE TO DILUTION INTO CALIBRATION RANGE.
* = ELEVATED REPORTING LIMIT DUE TO MATRIX INTERFERENCE (DILUTION PRIOR DIGESTION AND/OR ANALYSIS). @ = ADJUSTED REPORTING LIMIT DUE TO SAMPLE MATRIX (DILUTION PRIOR TO DIGESTION AND/OR ANALYSIS). = ANALYTICAL (POST DIGESTION) SPIKE. Ρ I = DUPLICATE INJECTION. & = AUTOMATED F = SAMPLE SPIKED > 4 X SPIKE CONCENTRATION. N/C+ = NOT CALCULABLE H = SAMPLE AND/OR DUPLICATE RESULT IS BELOW 5 X STL REPORTING LIMIT AND THE ABSOLUTE DIFFERENCE BETWEEN THE RESULTS EXCEEDS THE STL REPORTING LIMIT; THEREFORE, THE RESULTS ARE "OUT OF CONTROL". A = SAMPLE AND DUPLICATE RESULTS ARE "OUT OF CONTROL". Z = THE SAMPLE RESULT FOR THE SPIKE IS BELOW THE REPORTING LIMIT. HOWEVER, Z = THE SAMPLE RESULT FOR THE SPICE IS BELOW THE REPORTING LIMIT. HO THIS RESULT IS REPORTED FOR ACCURATE QC CALCULATIONS. NH= SAMPLE AND / OR DUPLICATE RESULT IS BELOW 5 X STL REPORTING LIMIT AND THE ABSOLUTE DIFFERENCE BETWEEN THE RESULTS EXCEEDS THE STL REPORTING LIMIT; THEREFORE, THE RESULTS ARE "OUT OF CONTROL". SAMPLE IS NON-HOMOGENEOUS. = REPORTING LIMITS RAISED DUE TO CLP METHOD NOT REQUIRING A CONCENTRATION STEP FOR CN. (*)(CA) = SEE CORRECTIVE ACTIONS FORM. **= MATRIX INTERFERENCE SW-846, 3rd Edition, latest EPA-approved edition. EPA 600/4-79-020, Revised March 1983. STANDARD METHODS, For the Examination of Water and Wastewater, latest EPA-approved edition. NIOSH Manual of Analytical Methods, 4th Edition. ANNUAL BOOK OF ASTM STANDARDS, VOLUMES 11.01 and 11.02, latest EPA-approved edition. METHODS FOR THE DETERMINATION OF INORGANIC SUBSTANCES IN ENVIRONMENTAL SAMPLES, EPA600/R-93/100, AUGUST 1993 METHODS FOR SOIL ANALYSIS, PART 2, CHEMICAL AND MICROBILOGICAL PROPERTIES, 2ND EDITION. STL-PN USES THE MOST CURRENT PROMULGATED METHODS FROM THE REFERENCES LISTED ABOVE. COLIFORM PRECISION IS MEASURED BY THE ABSOLUTE DIFFERENCE BETWEEN THE LOGARITHM OF COLONIES PER 100 MLS OF SAMPLE ON DUPLICATE PLATES. PH PRECISION IS MEASURED BY THE ABSOLUTE DIFFERENCE BETWEEN THE 1. COLIFORM. 2. PH. SAMPLE AND DUPLICATE ANALYSIS. 3. FLASHPOINT. FLASHPOINT PRECISION IS MEASURED BY THE ABSOLUTE DIFFERENCE BETWEEN THE SAMPLE AND DUPLICATE ANALYSIS. RPD = RELATIVE PERCENT DIFFERENCE (OR DEVIATION) RPD LMTS = REPORTING LIMITS BASED ON METHOD DETECTION LIMIT STUDIES. COE = EPA/COE, EPA/CE-81-1, 1981, AMMONIA, TKN, NO3-NO2, T-PO4 AND PHENOL PREPARATION METHODS . SAMPLES AND QC SAMPLES ARE NOT ADJUSTED FOR DRY WEIGHT UNLESS REQUESTED BY THE CLIENT. RB = REBECCA BROWN CR = CYNTHIA ROBERTS DPH = DOLLY P. HWANG WH = WENDY HAGGARD ED = ESTHER DANTIN AB = AMY BRADLEYBE = BETTY EVERTON PLD = PAULA L. DO RH = RICKY HAGENDORFER LT = LISA TORRES PLD = PAULA L. DOUGHTY

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Quality Control Report

Analysis: RCRA METALS - AXIAL

Accession:905635Client:PINNACLE LABORATORIESProject Number:905106Project Name:PHILProject Location:BURLINGTON DRILLINGDepartment:METALS

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[0) Page 1 Date 10-Jun-99

				1		Date 10-Jun-				
Parameter: Batch Id: Blank Result: Anal. Method: Prep. Method: Analysis Date: Prep. Date:	SILVER AYW154 <0.005 6010B 3010A 08-JUN-99 07-JUN-99	"Metals Q ARSENIC RYW154 <0.005 6010B 3010A 08-JUN-99 07-JUN-99	uality Cont BARIUM BYW154 <0.01 6010B 3010A 08-JUN-99 07-JUN-99	rol Report" CADMIUM CYW154 <0.005 6010B 3010A 08-JUN-99 07-JUN-99	CHROMIUM HYW154 <0.005 6010B 3010A 08-JUN-99 07-JUN-99	MERCURY M7W047 <0.0002 7470A 7470A 09-JUN-99 09-JUN-99				
Sample Duplication										
Sample Dup: Rept Limit:	905635-2 <0.005	905635-2 <0.005	905635-2 <0.01	905635-2 <0.005	905635-2 <0.005	905588-1 <0.0002				
Sample Result: Dup Result: Sample RPD: Max RPD: Dry Weight%	0.55 0.54 2 20 N/A	1.0 1.0 20 N/A	1.1 1.1 0 20 N/A	0.48 0.48 0 20 N/A	0.99 0.99 0 20 N/A	0.0050 0.0048 4 20 N/A				
Matrix Spi	ke									
Sample Spiked: Rept Limit:	905635-2 <0.005	905635-2 <0.005	905635-2 <0.01	905635-2 <0.005	905635-2 <0.005	905588-1 <0.0002				
Sample Result: Spiked Result: Spike Added: % Recovery: % Rec Limits: Dry Weight%	<0.005 0.55 0.5 110 75-125 N/A	0.006 1.0 1.0 99 75-125 N/A	0.14 1.1 1.0 96 75-125 N/A	<0.005 0.48 0.5 96 75-125 N/A	0.019 0.99 1.0 97 75-125 N/A	<0.0002 0.0050 0.0050 100 75-125 N/A				
ICV										
ICV Result: True Result: % Recovery: % Rec Limits:	0.49 0.5 98 90-110	1.0 1.0 100 90-110	1.0 1.0 100 90-110	0.50 0.5 100 90-110	1.0 1.0 100 90-110	0.0039 0.0040 98 90-110				
LCS										
LCS Result: True Result: % Recovery: % Rec Limits:	0.52 0.5 104 80-120	1.0 1.0 100 80-120	1.0 1.0 100 80-120	0.52 0.5 104 80-120	1.0 1.0 100 80-120	0.0051 0.0050 102 85-115				

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[0) Page 2 Date 10-Jun-99

Parameter: Batch Id: Blank Result: Anal. Method: Prep. Method: Analysis Date: Prep. Date:	LEAD PYW154 <0.005 6010B 3010A 08-JUN-99 07-JUN-99	"Metals Q SELENIUM SYW154 <0.01 6010B 3010A 08-JUN-99 07-JUN-99	Quality	Control	Report"
Sample Dup	lication		-		
Sample Dup: Rept Limit:	905635-2 <0.005	905635-2 <0.01			
Sample Result: Dup Result: Sample RPD: Max RPD: Dry Weight%	0.96 0.97 1 20 N/A	1.0 1.0 20 N/A			
 Matrix Spi	ke				
Sample Spiked: Rept Limit:	905635-2 <0.005	905635-2 <0.01			
Sample Result: Spiked Result: Spike Added: % Recovery: % Rec Limits: Dry Weight%	0.007 0.96 1.0 95 75-125 N/A	<0.01 1.0 1.0 100 75-125 N/A			
ICV			-		
ICV Result: True Result: % Recovery: % Rec Limits:	0.98 1.0 98 90-110	0.99 1.0 99 90-110			
LCS			_		
LCS Result: True Result: % Recovery: % Rec Limits:	1.0 1.0 100 80-120	0.99 1.0 99 80-120			

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[0) Page 3 Date 10-Jun-99

--- Data Qualifiers for Metals QC Report ----

N/A = NOT APPLICABLE.N/S = NOT SUBMITTED.N/C = SAMPLE AND DUPLICATE RESULTS ARE AT OR BELOW THE REPORTING LIMIT; THEREFORE, THE RPD IS "NOT CALCULABLE" AND NO CONTROL LIMITS APPLY. N/D = NOT DETECTED AT OR ABOVE THE STL-PENSACOLA REPORTING LIMIT (RL). DISS. OR D = DISSOLVED T & D = TOTAL AND DISSOLVED R = REACTIVET = TOTALG = SAMPLE AND/OR DUPLICATE RESULT IS BELOW 5 X THE REPORTING LIMIT AND THE ABSOLUTE DIFFERENCE BETWEEN THE SAMPLE AND DUPLICATE RESULT IS AT OR BELOW STL REPORTING LIMIT; THEREFORE, THE RESULTS ARE "IN CONTROL". = THE ANALYTICAL (POST-DIGESTION) SPIKE IS REPORTED DUE TO PERCENT RECOVERY 0 BEING OUTSIDE ACCEPTANCE LIMITS ON THE MATRIX (PRE-DIGESTION) SPIKE. = ELEVATED REPORTING LIMIT DUE TO INSUFFICIENT SAMPLE. = ELEVATED REPORTING LIMIT DUE TO DILUTION INTO CALIBRATION RANGE. # = ELEVATED REPORTING LIMIT DUE TO MATRIX INTERFERENCE. (DILUTION PRIOR TO ANALYSIS) @ = ADJUSTED REPORTING LIMIT DUE TO SAMPLE MATRIX. (DILUTION PRIOR TO DIGESTION) = ANALYTICAL (POST DIGESTION) SPIKE. Ρ I = DUPLICATE INJECTION. & = AUTOMATED = SAMPLE SPIKED > 4 X SPIKE CONCENTRATION. ਸ਼ਾ N/C+ = NOT CALCULABLEN/C* = NOT CALCULABLE; SAMPLE SPIKED > 4 X SPIKE CONCENTRATION. H = SAMPLE AND/OR DUPLICATE RESULT IS BELOW 5 X STL REPORTING LIMIT AND THE ABSOLUTE DIFFERENCE BETWEEN THE RESULTS EXCEEDS THE STL REPORTING LIMIT; THEREFORE, THE RESULTS ARE "OUT OF CONTROL". A = SAMPLE AND DUPLICATE RESULTS ARE "OUT OF CONTROL". = THE SAMPLE RESULT FOR THE SPIKE IS BELOW THE STL REPORTING LIMIT. HOWEVER, Ζ THIS RESULT IS REPORTED FOR ACCURATE QC CALCULATIONS. NH= THE RELATIVE PERCENT DIFFERENCE (RPD) EXCEEDS THE STL CONTROL LIMIT AND IS "OUT OF CONTROL; DUE TO A NON-HOMOGENEOUS SAMPLE MATRIX. J = (FLORIDA DEP 'J' FLAG) - MATRIX SPIKE AND POST SPIKE RECOVERY IS OUT OF THE ACCEPTABLE RANGE. SEE OUT OF CONTROL EVENTS FORM. U = (FLORIDA DEP 'U' FLAG) - THE COMPOUND WAS ANALYZED FOR, BUT NOT DETECTED.S = METHOD OF STANDARD ADDITIONS (MSA) WAS PERFORMED ON THIS SAMPLE. M = A MATRIX EFFECT WAS PRESENT (SAMPLE WAS ANALYZED TWICE TO CONFIRM). SCN = SEE CASE NARRATIVE. FROM QUALITY CONTROL REPORT: RPD= RELATIVE PERCENT DEVIATION. REPT LIMIT= REPORTING LIMIT BASED ON METHOD DETECTION LIMIT STUDIES. NOTE: ALL RESULTS REPORTED UNDER 'SAMPLE DUPLICATION' ARE THE MS/MSD. THE UNITS REPORTED ON THE QUALITY CONTROL REPORT ARE REPORTED ON AN AS NOTE : RUN BASIS. (NOT ADJUSTED FOR DRY WEIGHT). SW-846, 3rd Edition. EPA 600/4-79-020, Revised March 1983. NIOSH Manual of Analytical Methods, 4th Edition. Standard Methods For the Examination of Water and Wastewater, 18th Edition, 1992. Methods For the Determination of Metals in Environmental Samples - Supplement I, EPA 600/R-94-111, May 1994. LT = LISA TORRESKN = KAREN NALL GSP = GARY ST PERECH = CHRIS HIGH JL = JANET LECLEAR MPE = MARTY EDWARDS





Data Qualifiers for Final Report

STL-Pensacola Inorganic/Organic and AFCEE Projects (under QAPP)

J4	(For positive results)	Temperature limits excee	ded (<2°C or > 6°C)						
J5	(TICs)		antitated as a TIC; therefor	a it is astimated					
J6	(For positive results)			e, it is estimated or < lower control limit (LCL)					
J7	(For positive results)		e laboratory MDL and < low						
57	(i or positive results)	therefore, the quantitation		vest calibration standards;					
J (AFCEE description)	The analyte was positively	y identified, the quantitation							
R1	(For nondetects)	Temperature limits excee							
R2		preservative present in san							
R3		correct preservative present							
R4	Holding time exceeded	where preservative present	in sample upon receipt						
R5		ot met, improper container u	used for sample						
R6		LCL and analyte is not dete		10% for detectologn detecto					
R7		tside -50% to $+100\%$ of initial							
R8			•						
R9		Second source calibration verification exceeds acceptance criteria. Improper preservation, sample not filtered in the field.							
R (AFCEE description)		le to deficiencies in the abilit	v to analyze the sample and	d meet OC criteria					
F	< laboratory or AFCEE RI		y to analyze the sample and	u meet wo untena					
F (AFCEE description)	•	y identified but the associate	d numerical value is below	the AECEE or Job RI					
U2	• •	for result will be the MDL, ne							
U (AFCEE description)		d for but not detected. The a	•	is at or below the MDI					
B (AFCEE description)		the associated blank, as we							
@		lue to sample matrix (dilutio	•	analysis)					
→+		lue to dilution into calibration							
•		lue to matrix interference (d	-	d/or analysis)					
#		lue to insufficient sample size							
D	Diluted out								
М		ent (sample was analyzed to	wice to confirm or chromate	ogram had interfering peaks)					
S		was submitted to the labor		5					
т	•	tion exceeded the SW-846		s compound.					
ND = Not Detected at or a IDL = Laboratory Instrume		reporting limit (RL)	N/S = Not Submitted MDL = Laboratory Metho	N/A = Not Applicable d Detection Limit					

RL = Reporting Limit (AFCEE RLs are listed in the AFCEE QAPP)

Any time a sample arrives at the laboratory improperly preserved (at improper pH or temperature) or after holding time has expired or prepared or analyzed after holding time, client must be notified in writing (i.e. case narrative)

Florida Projects Inorganic/Organic Refer to back side of this page

ICR Projects Inorganic/Organic_ Ā1 Acceptable

Examples: ICR Flags

R6 = Laboratory extracted the sample but the refrigerator malfunctioned so the extract became warm and client was notified R6 = Sample arrived in laboratory in good condition; however, the laboratory did not analyze it within EPA's established holding time limit-

Rejected

CLP and CLP-like Projects: Refer to referenced CLP Statement of Work (SOW) for explanation of data qualifiers

R6

-	oratories of orida
Lab Accession #: 905635	Date Received: 29 may - 79
1. Was there a Chain of Custody? Yes No*	8. Were samples checked for preservative? (Check pH of all H ₂ O requiring preservative (STL-PN SOP 917) except VOA vials that require zero
2. Was Chain of Custody properly Yes No* filled out and relinquished?	9. Is there sufficient volume for analysis requested?
3. Were samples received cold? (Criteria: 2° - 6°C: STL-SOP 1055)	10. Were samples received within Holding Time? (REFER TO STL-SOP 1040)
 Were all samples properly labeled and identified? Did samples require splitting? 	11. Is Headspace visible > ¼" in diameter in VOA vials?* If any headspace is evident, comment
 Req By: PM Client Other* 6. Were samples received in proper Yes No* containers for analysis 	in out-of-control section. 12. If sent, were matrix spike bottles Yes No ⁺ N/A returned?
requested? 7. Were all sample containers received intact?	13. Was Project Manager notified of Yes No* N/A problems? (initials:
Airbill Number(s): <u>4412 6310 3632</u>	Shipped By: FEPEX
Cooler Number(s): Client Cooler	Shipping Charges: <u>N/A</u>
Cooler Weight(s): <u>N/A</u>	Cooler Temp(s) (°C): <u>2.0℃-Cc/</u> 5-
Out of Control Events and Inspection Commen	(LIST THERMOMETER NUMBER(S) FOR VERIFICATION)
10. The NO2 songle for	somple 905106-01 was received
out of hold time. He 5%.	29/99.
	(USE BACK OF PSIFFOR ADDITIONAL NOTES AND COMMENTS)
Inspected By:AFE Date:	9_Logged By:Date:/29/29
 Note all Out-of-Control and/or questionable events on Comment Section Note who requested the splitting of samples on the Comment Section All preservatives for the State of North Carolina, the State of New York 	
pH results (STL-SOP 938). * According to EPA, ¼" of headspace is allowed in 40 ml vials requiring	volatile analysis, however, STL makes it policy to record any headspace as out-
of-control (STL-SOP 938). WORD\ELKINS\SAMPCTRL\PSIF2.DOC December 22, 1998	į.

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REQUIRED: YES NO	SPECIAL CERTIFICATION	RUSH SURCHARGE:	DUE DATE: 6/11 COMMENTS	f	TAT-STANDARD RUSH!	CREQUIRED MS MSD BLANK	OC LEVEL: STO, IV	PROJ. NAME: PHIL	PROJECT #: 405106	PROJECT INFORMATION					-02	905106-01 527	SAMPLE ID DATE	Pinnacle Laboratories, Inc. 2709-D Pan American Freeway, NE Albuquerque, New Mexico 87107 (505) 344-3777 Fax (505) 344-4413 (1/4 G)	Network Project Manager:	Pinnacle Laboratories, Inc
			ITS:		LAB NUMBER:	Received Good Cond./Cold	Received Intact?	Chain of Custody Seals	Total Number of Containers	SAMPLE RECEIPT					1215 11 2	7 1015 AQ 1	E TIME MATRIX LABID	way, NE 17107 905-6:35	: Kimberly D. McNeill	•
			SEQUOIA	BARRINGER	N. CREEK	STL- NEW JERSEY	STL-CT	PORTLAND - ESL-OR	PENSACOLA - STL-FL	SAMPLES SENT TO:					X	X	Meta RCR Meta	Is (8) RCRA A TCLP METALS Is-13 PP List Is-TAL		Interlab Chain of Custody
Comp	Printe		Signal	R	Pinn		Printe		X	ק					XX	XX	TOX TOC Gen	Chemistry : CI, SO4, NO2 NO3		stody
Dany SIL-FL	Printed Name: Date: 5/2%	- Vez	Signaturg: 1 0 Time: 1000	D BY:	nnacle Laboratories, Inc.	2	Date:	Huncine Jourd 1 100	N Jime:	ELINQUISHED BY: CONSISTENT							Oil an Volat BOD COD PES ⁻ 8270	nd Grease tile Organics GC/MS (8260) TICIDES/PCB (608/8080) BY GC/MS	ANALYSIS REQUEST	Date: 528 p
Сотрапу	12//99 Printed Name:		Signature:	1. RECEIVED BY:	Сотралу	2-	Printed Name:		Signature:	1. RELINQUISHED BY:							8240 Herb Base/ (625/8 URA	(8310) (TCLP 1311) ZHE icides (615/8150) Neutral Acid Compounds GC/MS 3270) NIUM IUM 226+228		Page:ot
	Date:		Time:	2			Date:		Time:	2.							то-1	s Alpha/Beta 4 ER OF CONTAINERS		

PLEASE FILL THIS	FORM IN CC.	 SHADED ARE	AS AF FOR LAB USE ONLY	1
SHIPPED VIA: SAMPLE RECEIPT NO. CONTAINERS CUSTODY SEALS CUSTODY SEALS RECEIVED INTACT BLUE ICECE BLUE ICECE 11/10/98 PLI Inc.: Pinnacle Laboratories, Inc. • 270	PROJ. NO .: 21057 PROJ. NAME: Burlissen Pristing	BK-TaylorMerl ST BK-Fogelson Mul St	ip Serving Len 5) 326 ming Len ming Len	INDUCE Pinnacle La
9-D Pan American Freeway, NE • Albur		5/27-1015 bester \$727-1215 bester	es es dim 8740/ 2262 rod rod rod die 8740/ ATE 8711ME MATRIX	Pinnacle Laboratories Inc. MANAGER:
SHIPPED VIA: COMMENTS: FIXED FEE See reverse side (Force Magure) SAMPLE RECEIPT O See reverse side (Force Magure) See reverse side (Force Magure) NO. CONTAINERS O O O O O SUBPED VIA: O O O See reverse side (Force Magure) See reverse side (Force Magure) NO. CONTAINERS O O O O O Received Magure) Received Magure) Received Magure) CUSTODY SEALS O O/ O O O O O O O O O See reverse side (Force Magure) Ime:	ION IS REQUIRED FOR RUSH PROJECTS		Signal Image: Signal Structure Petroleum Hydrocarbons (418.1) TRPH (MOD.8015) Diesel/Direct Inject (M8015) Gas/Purge & Trap 8021 (BTEX)/8015 (Gasoline) MTBE 8021 (BTEX) MTBE TMB PCE 8021 (TCL) 8021 (HALO) 8021 (CUPT)	CHAIN OF CU
	RELINOUISHED BY: Signature: Time: /5 Zi I. Signature: Date: 2/27/57 Printed Name: Date: 2/27/57 Company:	Image: select	Base/Neutral/Acid Compounds GC/MS (625/8270)	STODY PLI Accession #
RECEIVED BY: (LAB) 2. Phonature 1 Tame: 1010 Phonature Date: 0.010 Phone Date: 0.0100 Phone Date: 0.01000 Phone D	RELINOUISHED BY: 2		Polynuclear Aromatics (610/8310/8270-SIMS) General Chemistry: CI, Sc4, No2 TDS, NO3 Priority Pollutant Metals (13) Target Analyte List Metals (23) RCRA Metals (8) RCRA Metals by TCLP (Method 1311) Metals: NUMBER OF CONTAINERS	905.106