

3R - 138

**GENERAL
CORRESPONDENCE**

YEAR(S):

1996

BLAGG ENGINEERING, INC.

P.O. Box 87, Bloomfield, New Mexico 87413

Phone: (505) 632-1199 Fax: (505) 632-3903

September 4, 1996

Mr. James D. Walker
Navajo Nation EPA
P.O. Box 1979
Shiprock, NM 87420

Re: Duncan Oil, Inc. - North Hogback Unit Earthen Pits Supplemental Investigation

Dear Mr. Walker:

On behalf of Duncan Oil, Inc., Blagg Engineering, Inc. (BEI) is pleased to submit the results of a supplemental investigation of the extent of hydrocarbon impact at the North Hogback Unit commenced June 24, 1996. This investigation was completed according to a plan submitted to the Navajo Nation Environmental Protection Agency (NN EPA) by BEI dated December 18, 1995 and approved by the NN EPA in a letter to Dugan Production Corp. dated January 23, 1996.

An initial evaluation of the extent and magnitude of soil and groundwater contamination at the field was performed in June and July, 1995. The results of that testing was presented in a report submitted to the NN EPA dated September 14, 1995.

Additional Evaluation of Hydrocarbon Impacts

The vertical extent of hydrocarbon contamination at the most down-gradient earthen pit in the North Hogback Unit was determined by excavation and drilling. The pit tested was the North Hogback #7-6 North Tank Drain Pit. A test hole was dug through the pit center using a track excavator contracted through Envirotech, Inc. Heavy cobble was encountered during excavation to a depth of 18' from the ground surface. Hydrocarbon contamination was apparent the entire depth evidenced by black staining and hydrocarbon odor. At 18' a hard shale layer was encountered which precluded further excavation. The excavator was able to penetrate several inches into the brown shale layer and a sample was collected for laboratory analysis of hydrocarbons. BTEX analysis of this sample using EPA Method 8020 showed a hydrocarbon concentration of 94.8 ug/Kg (0.0948 ppm). Total Petroleum Hydrocarbon (TPH) analysis was performed using EPA Method 8015 with a result of 1.4 mg/Kg (1.4 ppm). Laboratory results indicate the hydrocarbons were limited in their vertical penetration of the shale layer.

A piece of 24" culvert was set on top of the shale layer and backfilled on the outside to provide a conduit for drilling. A drilling rig was then contracted through Envirotech, Inc. to drill to groundwater. Groundwater was encountered at a depth of approximately 31' from the ground surface. Samples collected during drilling indicated no hydrocarbon staining. Soil samples collected at 5' intervals and field tested for headspace organic vapor content using a calibrated photo-ionization detector (PID) indicated readings of 45 ppm at 25' and 18 ppm at 30'. A 2" groundwater monitoring well was set for future groundwater sampling. A field boring log is attached to this report.

Groundwater Sampling

Groundwater sampling of all monitor wells in the North Hogback unit was done on June 28 and July 2, 1996. Samples were analyzed for volatile hydrocarbons using US EPA Method 8020, nitrates, and selenium. Sample results are found in Table 1. Sampling will be conducted quarterly during the first year of remediation at the #7-1, #7-6, and #12-9 locations. Additional sampling at the #6-6 location is deemed unnecessary due to all constituents registering well below New Mexico groundwater standards.

Table 1
Groundwater sampling Results
Duncan Oil
North Hogback Unit

WELL	DATE	BENZENE ppb	TOLUENE ppb	ETHYL- BENZENE ppb	TOTAL XYLENES ppb	NITRATE mg/L	SELENIUM mg/L
#6-6, MW-1	7/3/95	1.8	0.9	1	4.6		
	7/2/96	<0.2	0.7	0.2	0.9	<0.2	<0.02
MW-2	7/3/95	ND	ND	ND	0.4		
	7/2/96	<0.2	<0.2	<0.2	<0.2	<0.2	<0.02
MW-3	7/3/95	4.8	7.8	2.9	14.6		
	7/2/96	<0.2	0.2	<0.2	<0.2	<0.2	<0.02
#7-1, MW-1	6/28/96	<0.2	<0.2	<0.2	<0.2	2.3	<0.02
MW-2	7/3/95	7.5	13.6	83.9	493.6		
	6/28/96	<0.2	2.3	5.2	6.7	36	<0.02
MW-3	7/3/95	ND	13.1	39.4	292.2		
	6/28/96	0.5	2.4	8.5	26.9	<0.2	<0.02
MW-4	6/28/96	<0.2	<0.2	<0.2	<0.2	17.1	<0.02
#7-6, MW-1	6/28/96	0.8	2.6	1.1	3.5	14.1	0.09
#12-9, MW-1	7/3/95	ND	4.4	ND	29.5		
	6/28/96	<0.2	0.3	1.5	2.4	<0.2	<0.02
MW-2	6/28/96	<0.2	<0.2	<0.2	<0.2	<0.2	<0.02

Implementation of In-Situ Soil Reclamation

Prior to implementation of in-situ reclamation procedures as previously outlined, soil samples were collected from the bottoms of each pit and field tested for TPH using US EPA Method 418.1. This will establish a baseline for future evaluation of the reclamation program. Following are those TPH results:

<u>Well Location</u>	<u>Pit Identification</u>	<u>TPH Results (ppm)</u>
North Hogback #6-6	Production/Separator Pit	690
North Hogback #7-1	Production/Separator Pit	440
	Tank Drain Pit	6400
North Hogback #7-3	Production/Separator Pit	38000
North Hogback #7-4	Production/Separator Pit	180
North Hogback #7-6	Production/Separator Pit	68000
	North Tank Drain Pit	(need backhoe to sample)
	South Tank Drain Pit	4400
North Hogback #12-1	Production/Separator Pit	59000
North Hogback #12-9	Production/Separator Pit	13100

Performance of initiation of in-situ reclamation procedures is planned within the next month followed by periodic sampling of soils as previously outlined.

If you have any questions or comments concerning this report, Blagg Engineering, Inc. may be contacted at (505) 632-1199.

Respectfully submitted,
Blagg Engineering, Inc.

Robert E. O'Neill

Robert E. O'Neill, M.S.
Civil Engineering, Environmental

Reviewed by:

Jeffrey C. Blagg

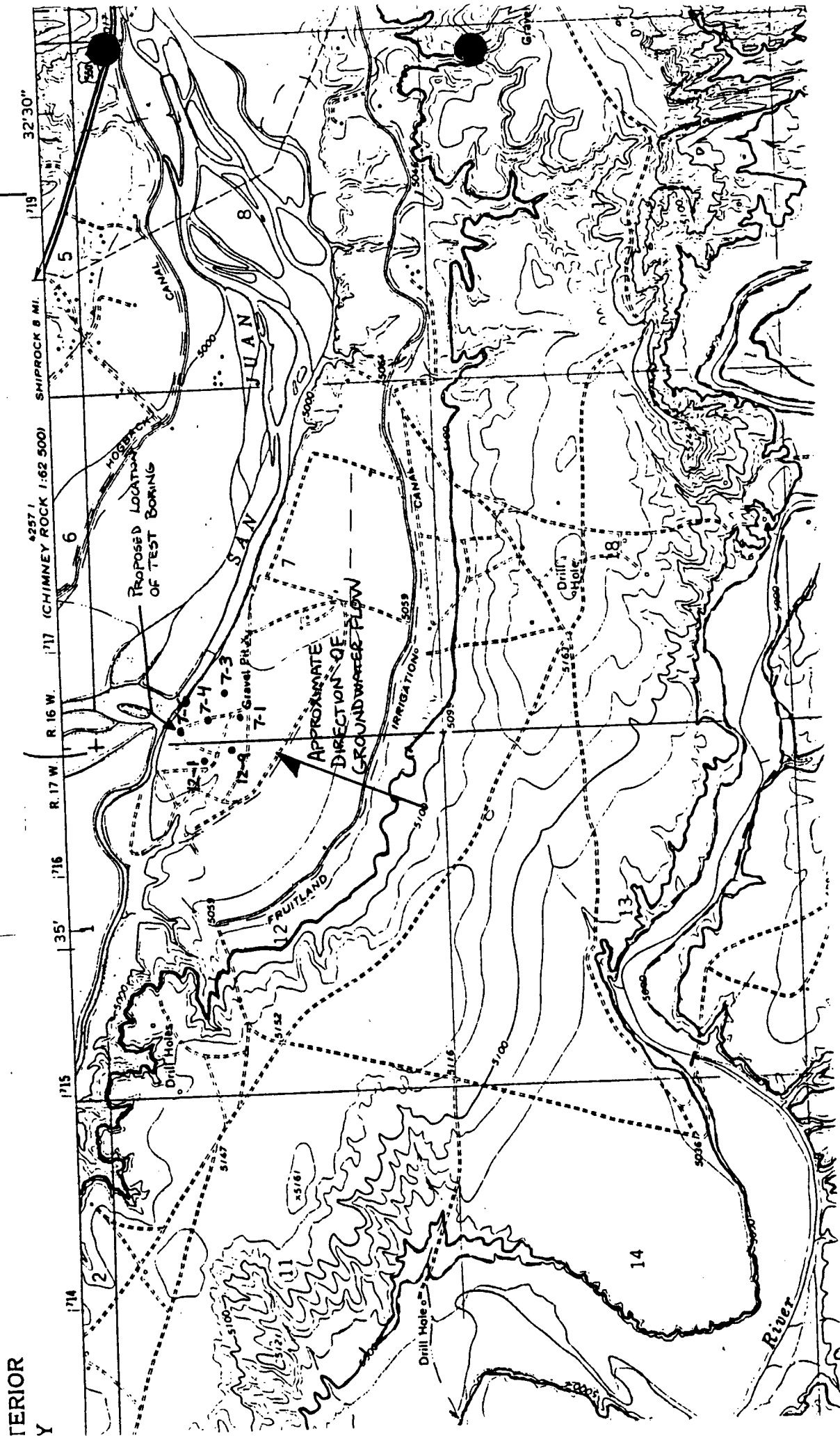
Jeffrey C. Blagg, PE
President

Attachments: Site Diagrams
Laboratory Reports
QA/QC

cc: Mr. John Bettridge, Duncan Oil, Inc.
Mr. John Alexander, Dugan Production
Mr. Denny G. Foust, N.M.O.C.D.
Mr. William C. Olson, N.M.O.C.D.

Ms. Linda Taylor, BIA
Mr. James Miles, BIA
Mr. Bill Liess, BLM

DUNCAN OIL, INC.
NORHT HOGBACK UNIT
(From USGS Topo Sheet)





89.3

MW #3
(89.26)

CULTIVATED
FIELD

GROUNDWATER
FLOW

89.1



88.9

MW #1
(88.86)

PIT

MW #2
(88.73)

88.7

LEGEND



GROUNDWATER
MONITORING WELL

(88.86)

GROUNDWATER
ELEVATION



NORTH HOGBACK UNIT
WELL 6-6
SEC. 6, T29N, R16W
SAN JUAN COUNTY, NM

DUNCAN ENERGY COMPANY

BLAGG ENGINEERING, INC.

P.O. BOX 87, BLOOMFIELD, NM 87413

PHONE: (505) 632-1199

FAX: (505) 632-3903

SITE
DIAGRAM

SHEET: A1

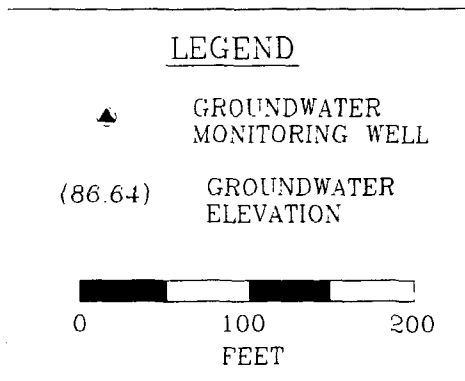
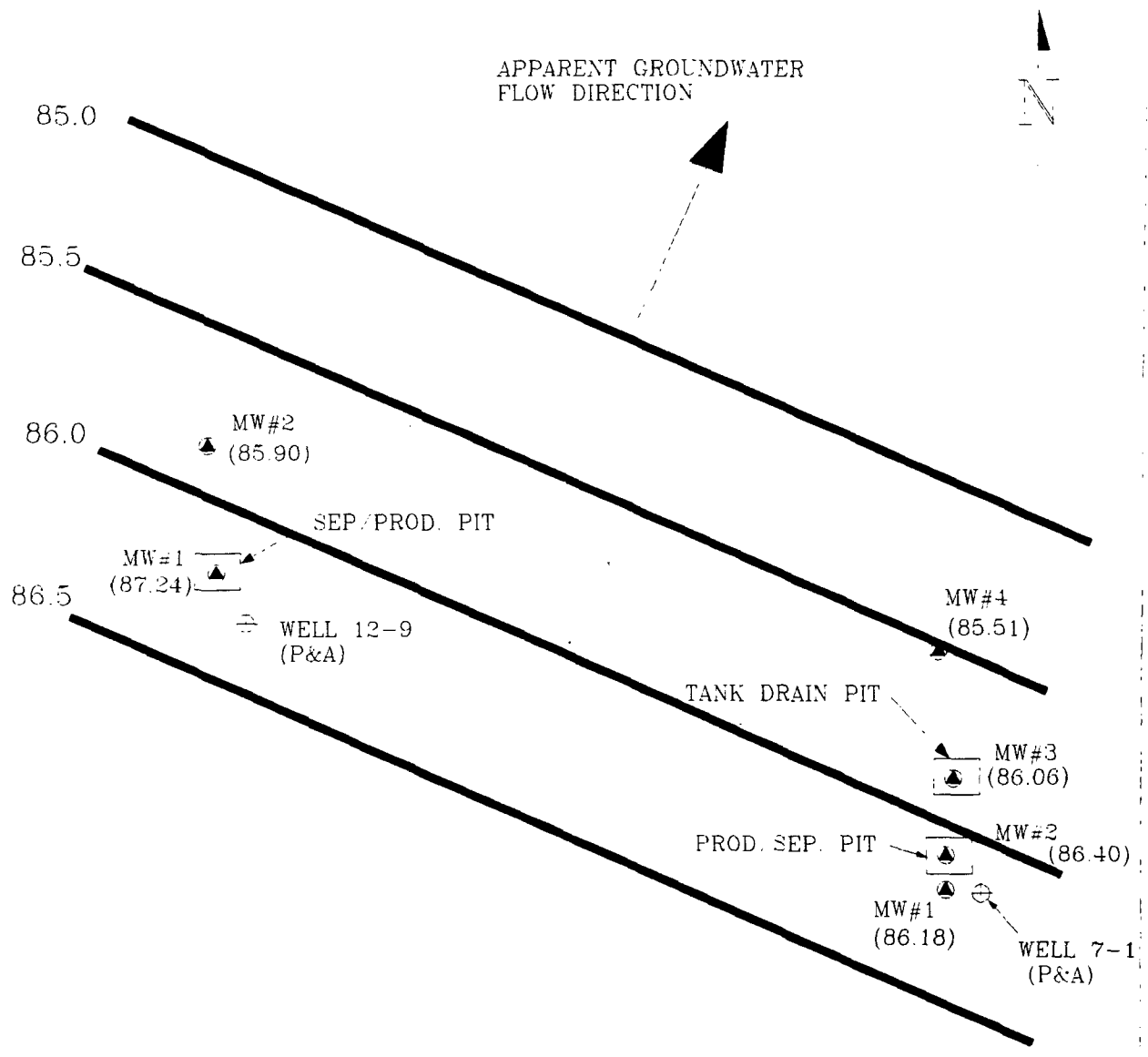
DRWN: JCB 95

REV: JULY 96

DRWN BY: REO

REV BY: REO

PRJ. MGR. JCB



NOTE: GROUNDWATER ELEVATION IN PITS MAY BE INACCURATE DUE TO RAINWATER INFLOW.

NORTH HOGBACK UNIT
WELLS 12-9 & 7-1
SEC. 7&12, T29N, R16W
SAN JUAN COUNTY, NM
DUNCAN ENERGY COMPANY

BLAGG ENGINEERING, INC.
P.O. BOX 87, BLOOMFIELD, NM 87413
PHONE: (505) 632-1199
FAX: (505) 632-3903

SITE DIAGRAM	
SHEET: A1	DRWN: JULY 95 REV: JULY 96
DRWN BY: REO REV BY: REO	PRJ MGR: JCB

BLAGG ENGINEERING, INC.

FIELD BORING LOG

TEST BORING No. 1		MONITOR WELL No. A		PROJECT No.		PROJECT NAME: DUNCAN OIL INC.		SHEET: 1 OF 1	
MFG. DESIGNATION OF DRILL: EXCAVATOR / MOBILE DRILL - B-61						PROJECT LOCATION: NORTH HOBBACK SECTION 7, WELL #6			
TYPE OF BIT: 8" AUGER - SPLIT SPOON SAMPLER						SURFACE ELEVATION OF TB OR MW: 0		TOTAL DEPTH OF HOLE: EXCAVATE TO 18" DRILL 18"	
DATE	STARTED: 6-24-96 8:20-10:30		COMPLETED: 6-26-96 8:20-12:00		DRILLING Co.: ENVUROTECH				
COMPLETION TYPE: MONITOR WELL			15' SCREEN		ENGINEER: REJ	CREW: N	GROUNDWATER DEPTH: _____ TIME: _____		
SURFACE CONDITIONS: COBBLE									
DIST FROM SURF	SAMPLE TYPE	SAMPLE No	UVM READ IN PPM	BLOWS PER 6 IN	USCS	LOG OF MATERIAL/COMMENTS			
2						0-18" = GROSS CONTAMINATION - BLACK + HEAVY OIL HEAVY COBBLE TO 18"			
4					6W + COBBLE				
6									
8									
10									
12									
14									
16									
18	GRB	1	-	-	T.D.	MAXIMUM DEPTH 18" SHALE LAYER AT 18" - BROWN - NO OIL - NO SAIL, (LIGHT)			
20					SHALE MEDIUM HARD				
22									
24									
26	SPN	2	45	17	SHALE	53 blows/18" MOIST → DRY, DARK BROWN, FINE SHALE - NO OIL			
28									
30	SPN	3	18	~75	SHALE	50 blows/4"			
32					G.W.	GROUNDWATER AT ~ 30'6"			
34									
36						T.D. = 35'6" - SET WELL - 10' SCREEN SAND TO 23'2"			
38						BENTONITE TO 21'2" (2 FOOT PLUG)			
40									
42									
44									

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8020 AROMATIC VOLATILE ORGANICS

Client:	Blagg / Duncan Oil	Project #:	04034
Sample ID:	TH 1 @ 18'	Date Reported:	06-25-96
Laboratory Number:	A271	Date Sampled:	06-24-96
Chain of Custody:	4813	Date Received:	06-24-96
Sample Matrix:	Soil	Date Analyzed:	06-25-96
Preservative:	Cool	Date Extracted:	06-24-96
Condition:	Cool & Intact	Analysis Requested:	BTEX

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene	ND	11.7
Toluene	33.8	11.1
Ethylbenzene	ND	10.1
p,m-Xylene	38.1	14.4
o-Xylene	22.9	6.9
Total BTEX	94.8	

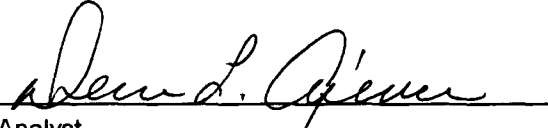
ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	Trifluorotoluene	98 %
	Bromofluorobenzene	100 %

References: Method 5030, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Method 8020, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, Sept. 1994.

Comments: North Hogback 7 #6 T. B. #1 North.


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

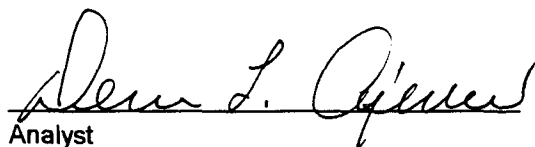
Client:	Blagg / Duncan Oil	Project #:	04034
Sample ID:	TH 1 @ 18'	Date Reported:	06-25-96
Laboratory Number:	A271	Date Sampled:	06-24-96
Chain of Custody No:	4813	Date Received:	06-24-96
Sample Matrix:	Soil	Date Extracted:	06-24-96
Preservative:	Cool	Date Analyzed:	06-25-96
Condition:	Cool and Intact	Analysis Requested:	8015 TPH

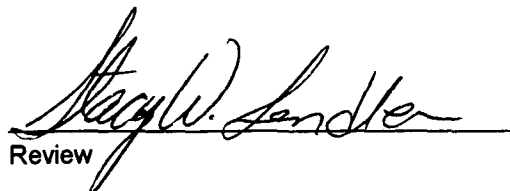
Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	ND	0.2
Diesel Range (C10 - C28)	1.4	0.1
Total Petroleum Hydrocarbons	1.4	0.2

ND - Parameter not detected at the stated detection limit.

References: Method 8015, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Comments: North Hogback 7 #6 T. B. #1 North.


Analyst


Review

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

Attn: *Bob O'Neill*
Company: *Blagg Engineering*
Address: *P.O. Box 87*
City, State: *Bloomfield, NM 87413*

Date: *8-Jul-96*
COC No.: *4223*
Sample No. *11384*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Well 6-6; MW-1*
Sampled by: *REO*
Analyzed by: *DC*
Sample Matrix: *Liquid*

Date: *2-Jul-96* Time: *11:40*
Date: *2-Jul-96*

Laboratory Analysis

Parameter	Result	Unit of Measure	Detection Limit	Unit of Measure
<i>Benzene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Toluene</i>	<i>0.7</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Ethylbenzene</i>	<i>0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>m,p-Xylene</i>	<i>0.6</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>o-Xylene</i>	<i>0.3</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>TOTAL</i>		<i>1.9</i>		<i>ug/L</i>

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

Approved by: *[Signature]*
Date: *2/8/96*

P.O. BOX 2606 • FARMINGTON, NM 87499

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

Attn: *Bob O'Neill*
Company: *Blagg Engineering*
Address: *P.O. Box 87*
City, State: *Bloomfield, NM 87413*

Date: *8-Jul-96*
COC No.: *4223*
Sample No. *11385*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Well 6-6; MW-2*
Sampled by: *REO*
Analyzed by: *DC*
Sample Matrix: *Liquid*

Date: *2-Jul-96* Time: *10:50*
Date: *2-Jul-96*

Laboratory Analysis

Parameter	Result	Unit of Measure	Detection Limit	Unit of Measure
<i>Benzene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Toluene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Ethylbenzene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>m,p-Xylene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>o-Xylene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>TOTAL</i>		<i><0.2</i>		<i>ug/L</i>

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

Approved by: *JA*
Date: *7/8/96*

OFF: (505) 325-5667

ON SITE
TECHNOLOGIES, LTD.

LAB: (505) 325-1556

AROMATIC VOLATILE ORGANICS

Attn: *Bob O'Neill*
Company: *Blagg Engineering*
Address: *P.O. Box 87*
City, State: *Bloomfield, NM 87413*

Date: *8-Jul-96*
COC No.: *4223*
Sample No. *11386*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Well 6-6; MW-3*
Sampled by: *REO*
Analyzed by: *DC*
Sample Matrix: *Liquid*

Date: *2-Jul-96* Time: *11:15*
Date: *2-Jul-96*

Laboratory Analysis

<i>Parameter</i>	<i>Result</i>	<i>Unit of Measure</i>	<i>Detection Limit</i>	<i>Unit of Measure</i>
<i>Benzene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Toluene</i>	<i>0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Ethylbenzene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>m,p-Xylene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>o-Xylene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>TOTAL</i>	<i>0.2</i>	<i>ug/L</i>		

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

Approved by: *[Signature]*
Date: *7/8/96*

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

Attn: *Bob O'Neill*
Company: *Blagg Engineering*
Address: *P.O. Box 87*
City, State: *Bloomfield, NM 87413*

Date: *8-Jul-96*
COC No.: *4222*
Sample No. *11354*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Well 7-#1; MW-1*
Sampled by: *REO*
Analyzed by: *DC*
Sample Matrix: *Liquid*

Date: *28-Jun-96* Time: *10:05*
Date: *2-Jul-96*

Laboratory Analysis

<i>Parameter</i>	<i>Result</i>	<i>Unit of Measure</i>	<i>Detection Limit</i>	<i>Unit of Measure</i>
<i>Benzene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Toluene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Ethylbenzene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>m,p-Xylene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>o-Xylene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>TOTAL</i>	<i><0.2</i>	<i>ug/L</i>		

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

Approved by: *JA*
Date: *7/8/96*

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ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

Attn: *Bob O'Neill*
Company: *Blagg Engineering*
Address: *P.O. Box 87*
City, State: *Bloomfield, NM 87413*

Date: *8-Jul-96*
COC No.: *4222*
Sample No. *11355*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Well 7-#1; MW-2*
Sampled by: *REO*
Analyzed by: *DC*
Sample Matrix: *Liquid*

Date: *28-Jun-96* Time: *10:25*
Date: *3-Jul-96*

Laboratory Analysis

Parameter	Result	Unit of Measure	Detection Limit	Unit of Measure
<i>Benzene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Toluene</i>	<i>2.3</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Ethylbenzene</i>	<i>5.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>m,p-Xylene</i>	<i>6.0</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>o-Xylene</i>	<i>0.7</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>TOTAL</i>		<i>14.3</i>		<i>ug/L</i>

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

Approved by: 

Date: *7/8/96*

P.O. BOX 2606 • FARMINGTON, NM 87499

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

Attn: *Bob O'Neill*
Company: *Blagg Engineering*
Address: *P.O. Box 87*
City, State: *Bloomfield, NM 87413*

Date: *8-Jul-96*
COC No.: *4222*
Sample No. *11356*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Well 7-#1; MW-3*
Sampled by: *REO*
Analyzed by: *DC*
Sample Matrix: *Liquid*

Date: *28-Jun-96* Time: *10:50*
Date: *3-Jul-96*

Laboratory Analysis

<i>Parameter</i>	<i>Result</i>	<i>Unit of Measure</i>	<i>Detection Limit</i>	<i>Unit of Measure</i>
<i>Benzene</i>	<i>0.5</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Toluene</i>	<i>2.4</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Ethylbenzene</i>	<i>8.5</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>m,p-Xylene</i>	<i>25.9</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>o-Xylene</i>	<i>1.0</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>TOTAL</i>	<i>38.4</i>	<i>ug/L</i>		

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

Approved by: *[Signature]*
Date: *7/8/96*

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

Attn: *Bob O'Neill*
Company: *Blagg Engineering*
Address: *P.O. Box 87*
City, State: *Bloomfield, NM 87413*

Date: *8-Jul-96*
COC No.: *4222*
Sample No. *11357*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Well 7-#1; MW-4*
Sampled by: *REO*
Analyzed by: *DC*
Sample Matrix: *Liquid*

Date: *28-Jun-96* Time: *11:15*
Date: *2-Jul-96*

Laboratory Analysis

Parameter	Result	Unit of Measure	Detection Limit	Unit of Measure
<i>Benzene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Toluene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Ethylbenzene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>m,p-Xylene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>o-Xylene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
	<i>TOTAL</i>	<i><0.2</i>		<i>ug/L</i>

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

Approved by: *Jal*
Date: *7/9/96*

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

Attn: *Bob O'Neill*
Company: *Blagg Engineering*
Address: *P.O. Box 87*
City, State: *Bloomfield, NM 87413*

Date: *8-Jul-96*
COC No.: *4222*
Sample No. *11360*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Well 7-#6; MW-1*
Sampled by: *REO*
Analyzed by: *DC*
Sample Matrix: *Liquid*

Date: *28-Jun-96* Time: *8:50*
Date: *2-Jul-96*

Laboratory Analysis

<i>Parameter</i>	<i>Result</i>	<i>Unit of Measure</i>	<i>Detection Limit</i>	<i>Unit of Measure</i>
<i>Benzene</i>	<i>0.8</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Toluene</i>	<i>2.6</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Ethylbenzene</i>	<i>1.1</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>m,p-Xylene</i>	<i>2.0</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>o-Xylene</i>	<i>1.5</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>TOTAL</i>	<i>8.1</i>	<i>ug/L</i>		

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

Approved by: *[Signature]*

Date: *7/8/96*

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

Attn: *Bob O'Neill*
Company: *Blagg Engineering*
Address: *P.O. Box 87*
City, State: *Bloomfield, NM 87413*

Date: *8-Jul-96*
COC No.: *4222*
Sample No. *11358*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Well 12-#9; MW-1*
Sampled by: *REO*
Analyzed by: *DC*
Sample Matrix: *Liquid*

Date: *28-Jun-96* Time: *9:40*
Date: *3-Jul-96*

Laboratory Analysis

<i>Parameter</i>	<i>Result</i>	<i>Unit of Measure</i>	<i>Detection Limit</i>	<i>Unit of Measure</i>
<i>Benzene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Toluene</i>	<i>0.3</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Ethylbenzene</i>	<i>1.5</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>m,p-Xylene</i>	<i>1.1</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>o-Xylene</i>	<i>1.3</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>TOTAL</i>	<i>4.1</i>	<i>ug/L</i>		

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

Approved by: *JAG*
Date: *7/8/96*

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

Attn: *Bob O'Neill*
Company: *Blagg Engineering*
Address: *P.O. Box 87*
City, State: *Bloomfield, NM 87413*

Date: *8-Jul-96*
COC No.: *4222*
Sample No. *11359*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Well 12-#9; MW-2*
Sampled by: *REO*
Analyzed by: *DC*
Sample Matrix: *Liquid*

Date: *28-Jun-96* Time: *9:20*
Date: *2-Jul-96*

Laboratory Analysis

<i>Parameter</i>	<i>Result</i>	<i>Unit of Measure</i>	<i>Detection Limit</i>	<i>Unit of Measure</i>
<i>Benzene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Toluene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Ethylbenzene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>m,p-Xylene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>o-Xylene</i>	<i><0.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>TOTAL</i>		<i><0.2</i>		<i>ug/L</i>

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

Approved by: *[Signature]*
Date: *2-9-96*

P.O. BOX 2606 • FARMINGTON, NM 87499



Report Number
96-192-2024

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121

Midwest Laboratories, Inc.

REPORT OF ANALYSIS

For: (6833) ON SITE TECHNOLOGIES LTD
(505)325-5667

Date Reported: 07/10/96
Date Received: 07/03/96
Date Sampled: 07/02/96

Mail to: ON SITE TECHNOLOGIES LTD
657 WEST MAPLE
P.O. BOX 2606
FARMINGTON NM 87499-

PO/Proj. #: 4223
DUNCAN OIL

Lab number: 304734

Analysis	Level Found	Units	Detection Limit	Method	Analyst-Date
Sample ID: N. HOGBACK 6-6 MW-1					
Nitrate nitrogen	n.d.	mg/L	0.2	EPA 353.2	lmb-07/03
Selenium (total)	n.d.	mg/L	0.02	EPA 270.2	pmb-07/10
Sample ID: N. HOGBACK 6-6 MW-2					
Nitrate nitrogen	n.d.	mg/L	0.2	EPA 353.2	lmb-07/03
Selenium (total)	n.d.	mg/L	0.02	EPA 270.2	pmb-07/10
Sample ID: N. HOGBACK 6-6 MW-3					
Nitrate nitrogen	n.d.	mg/L	0.2	EPA 353.2	lmb-07/03
Selenium (total)	n.d.	mg/L	0.02	EPA 270.2	pmb-07/10

Notes:

n.d. - Not Detected.
cc: Account(s) -669 DAVID COX

Respectfully Submitted

Heather Ramig/Lisa Dworak
Client Services

The above analytical results apply only to the sample(s) submitted.

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13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121

REPORT OF ANALYSIS

For: (6833) ON SITE TECHNOLOGIES LTD
(505)325-5667

Report Number
96-192-2023

Mail to: ON SITE TECHNOLOGIES LTD
657 WEST MAPLE
P.O. BOX 2606
FARMINGTON NM 87499-

PO/Proj. #: 4222
DUNCAN OIL

RECEIVED .III 1 5 1996

Date Reported: 07/10/96
Date Received: 07/03/96
Date Sampled: 06/28/96

Lab number: 304727

Analysis	Level Found	Units	Detection Limit	Method	Analyst-Date
<u>Sample ID: N. HOGBACK 7-1 MW-1</u>					
Nitrate nitrogen	2.3	mg/L	0.2	EPA 353.2	lmb-07/03
Selenium (total)	n.d.	mg/L	0.02	EPA 270.2	pmb-07/10
<u>Sample ID: N. HOGBACK 7-1 MW-2</u>					
Nitrate nitrogen	36	mg/L	2	EPA 353.2	lmb-07/03
Selenium (total)	n.d.	mg/L	0.02	EPA 270.2	pmb-07/10
<u>Sample ID: N. HOGBACK 7-1 MW-3</u>					
Nitrate nitrogen	n.d.	mg/L	0.2	EPA 353.2	lmb-07/03
Selenium (total)	n.d.	mg/L	0.02	EPA 270.2	pmb-07/10
<u>Sample ID: N. HOGBACK 7-1 MW-4</u>					
Nitrate nitrogen	17.4	mg/L	0.2	EPA 353.2	lmb-07/03
Selenium (total)	n.d.	mg/L	0.02	EPA 270.2	pmb-07/10
<u>Sample ID: N. HOGBACK 12-9 MW-1</u>					
Nitrate nitrogen	n.d.	mg/L	0.2	EPA 353.2	lmb-07/03
Selenium (total)	n.d.	mg/L	0.02	EPA 270.2	pmb-07/10
<u>Sample ID: N. HOGBACK 12-9 MW-2</u>					
Nitrate nitrogen	n.d.	mg/L	0.2	EPA 353.2	lmb-07/03
Selenium (total)	n.d.	mg/L	0.02	EPA 270.2	pmb-07/10

The above analytical results apply only to the sample(s) submitted.

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**Midwest
Laboratories, Inc.**

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121

Account: 6833 ON SITE TECHNOLOGIES LTD

Report Number: 96-192-2023

Page: 2

REPORT OF ANALYSIS

Analysis

Sample ID: N. HOGBACK 7-6 MW-1

Nitrate nitrogen

Selenium (total)

**Level
Found Units**

14.1 mg/L
0.09 mg/L

**Detection
Limit Method**

0.2 EPA 353.2
0.02 EPA 270.2

**Analyst-
Date**

lmb-07/03
pmb-07/10

Notes:

n.d. - Not Detected.

cc: Account(s) -669 DAVID COX

Respectfully Submitted

Heather Ramig/Lisa Dworak
Client Services

The above analytical results apply only to the sample(s) submitted.

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BLAGG ENGINEERING, INC.

P.O. Box 87, Bloomfield, New Mexico 87413
Phone: (505)632-1199 Fax: (505)632-3903

**FIELD MODIFIED EPA METHOD 418.1
TOTAL PETROLEUM HYDROCARBONS**

Client:	Duncan Oil	Project #:	
Sample ID:	Center Bottom @ 6'	Date Analyzed:	7-23-96
Project Location:	North Hogback 6#6	Date Reported:	7-24-96
Laboratory Number:	TPH #1741	Sample Matrix:	Soil

Parameter	Result, mg/kg	Detection Limit, mg/kg
Total Recoverable Petroleum Hydrocarbons	690	10

ND = Not Detectable at stated detection limits.

QA/QC:	QA/QC Sample TPH mg/kg	Duplicate TPH mg/kg	% *Diff.
	4,440	3,640	20

*Administrative Acceptance limits set at 30%.

Method: Modified Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No.4551, 1978

Comments: Production/Separator Pit

R. E. ONALD
Analyst

J. C. Blagg
Review

BLAGG ENGINEERING, INC.

P.O. Box 87, Bloomfield, New Mexico 87413
Phone: (505)632-1199 Fax: (505)632-3903

**FIELD MODIFIED EPA METHOD 418.1
TOTAL PETROLEUM HYDROCARBONS**

Client: Duncan Oil
Sample ID: Center Bottom @ 5'
Project Location: North Hogback 7#1
Laboratory Number: TPH #1742

Project #:
Date Analyzed: 7-23-96
Date Reported: 7-24-96
Sample Matrix: Soil

Parameter -----	Result, mg/kg -----	Detection Limit, mg/kg -----
Total Recoverable Petroleum Hydrocarbons	440	10

ND = Not Detectable at stated detection limits.

QA/QC:	QA/QC Sample TPH mg/kg -----	Duplicate TPH mg/kg -----	% *Diff. -----
	4,440	3,640	20

*Administrative Acceptance limits set at 30%.

Method: Modified Method 418.1, Petroleum Hydrocarbons, Total
Recoverable, Chemical Analysis of Water and Waste,
USEPA Storet No.4551, 1978

Comments: Production/Separator Pit

R. E. O'Neill
Analyst

J. L. Blagg
Review

BLAGG ENGINEERING, INC.

P.O. Box 87, Bloomfield, New Mexico 87413

Phone: (505)632-1199 Fax: (505)632-3903

**FIELD MODIFIED EPA METHOD 418.1
TOTAL PETROLEUM HYDROCARBONS**

Client:	Duncan Oil	Project #:	
Sample ID:	Center Bottom @ 5'	Date Analyzed:	7-23-96
Project Location:	North Hogback 7#1	Date Reported:	7-24-96
Laboratory Number:	TPH #1743	Sample Matrix:	Soil

Parameter	Result, mg/kg	Detection Limit, mg/kg
-----	-----	-----
Total Recoverable Petroleum Hydrocarbons	6,400	100

ND = Not Detectable at stated detection limits.

QA/QC:	QA/QC Sample TPH mg/kg	Duplicate TPH mg/kg	% *Diff.
	-----	-----	-----
	4,440	3,640	20

*Administrative Acceptance limits set at 30%.

Method: Modified Method 418.1, Petroleum Hydrocarbons, Total
Recoverable, Chemical Analysis of Water and Waste,
USEPA Storet No.4551, 1978

Comments: Tank Drain Pit

R. E. O'Neil
Analyst

J. C. Blagg
Review

BLAGG ENGINEERING, INC.

P.O. Box 87, Bloomfield, New Mexico 87413

Phone: (505)632-1199 Fax: (505)632-3903

**FIELD MODIFIED EPA METHOD 418.1
TOTAL PETROLEUM HYDROCARBONS**

Client: Duncan Oil
Sample ID: Center Bottom @ 4'
Project Location: North Hogback 7#3
Laboratory Number: TPH #1744

Project #:
Date Analyzed: 7-23-96
Date Reported: 7-24-96
Sample Matrix: Soil

Parameter -----	Result, mg/kg -----	Detection Limit, mg/kg -----
Total Recoverable Petroleum Hydrocarbons	38,000	1,000

ND = Not Detectable at stated detection limits.

QA/QC:	QA/QC Sample TPH mg/kg -----	Duplicate TPH mg/kg -----	% *Diff. -----
	4,440	3,640	20

*Administrative Acceptance limits set at 30%.

Method: Modified Method 418.1, Petroleum Hydrocarbons, Total
Recoverable, Chemical Analysis of Water and Waste,
USEPA Storet No.4551, 1978

Comments: Production/Separator Pit

R. E. O'Neill
Analyst

J. C. Blagg
Review

BLAGG ENGINEERING, INC.

P.O. Box 87, Bloomfield, New Mexico 87413
Phone: (505)632-1199 Fax: (505)632-3903

**FIELD MODIFIED EPA METHOD 418.1
TOTAL PETROLEUM HYDROCARBONS**

Client:	Duncan Oil	Project #:	
Sample ID:	Center Bottom @ 4'	Date Analyzed:	7-23-96
Project Location:	North Hogback 7#4	Date Reported:	7-24-96
Laboratory Number:	TPH #1745	Sample Matrix:	Soil

Parameter	Result, mg/kg	Detection Limit, mg/kg
-----	-----	-----
Total Recoverable Petroleum Hydrocarbons	180	10

ND = Not Detectable at stated detection limits.

QA/QC:	QA/QC Sample TPH mg/kg	Duplicate TPH mg/kg	% *Diff.
	-----	-----	-----
	4,440	3,640	20

*Administrative Acceptance limits set at 30%.

Method: Modified Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No.4551, 1978

Comments: Production/Separator Pit

A. E. O'Neil
Analyst

J. C. Blagg
Review

BLAGG ENGINEERING, INC.

P.O. Box 87, Bloomfield, New Mexico 87413

Phone: (505)632-1199 Fax: (505)632-3903

**FIELD MODIFIED EPA METHOD 418.1
TOTAL PETROLEUM HYDROCARBONS**

Client: Duncan Oil
Sample ID: Center Bottom @ 4'
Project Location: North Hogback 7#6
Laboratory Number: TPH #1740

Project #:
Date Analyzed: 7-23-96
Date Reported: 7-24-96
Sample Matrix: Soil

Parameter -----	Result, mg/kg -----	Detection Limit, mg/kg -----
Total Recoverable Petroleum Hydrocarbons	4,400	100

ND = Not Detectable at stated detection limits.

QA/QC:	QA/QC Sample TPH mg/kg -----	Duplicate TPH mg/kg -----	% *Diff. -----
	4,440	3,640	20

*Administrative Acceptance limits set at 30%.

Method: Modified Method 418.1, Petroleum Hydrocarbons, Total
Recoverable, Chemical Analysis of Water and Waste,
USEPA Storet No.4551, 1978

Comments: Tank Drain Pit

P. E. O'Neil
Analyst

J. C. Blagg
Review

BLAGG ENGINEERING, INC.

P.O. Box 87, Bloomfield, New Mexico 87413

Phone: (505)632-1199 Fax: (505)632-3903

**FIELD MODIFIED EPA METHOD 418.1
TOTAL PETROLEUM HYDROCARBONS**

Client:	Duncan Oil	Project #:	
Sample ID:	Center Bottom @ 4'	Date Analyzed:	7-23-96
Project Location:	North Hogback 7#6	Date Reported:	7-24-96
Laboratory Number:	TPH #1740 Duplicate	Sample Matrix:	Soil

Parameter	Result, mg/kg	Detection Limit, mg/kg
-----	-----	-----
Total Recoverable Petroleum Hydrocarbons	3,600	100

ND = Not Detectable at stated detection limits.

QA/QC:	QA/QC Sample TPH mg/kg	Duplicate TPH mg/kg	% *Diff.
	-----	-----	-----
	4,440	3,640	20

*Administrative Acceptance limits set at 30%.

Method: Modified Method 418.1, Petroleum Hydrocarbons, Total
Recoverable, Chemical Analysis of Water and Waste,
USEPA Storet No.4551, 1978

Comments: Tank Drain Pit

P. E. O'Neil
Analyst

J. C. Blagg
Review

BLAGG ENGINEERING, INC.

P.O. Box 87, Bloomfield, New Mexico 87413

Phone: (505)632-1199 Fax: (505)632-3903

**FIELD MODIFIED EPA METHOD 418.1
TOTAL PETROLEUM HYDROCARBONS**

Client:	Duncan Oil	Project #:	
Sample ID:	Center Bottom @ 2'	Date Analyzed:	7-23-96
Project Location:	North Hogback 7#6	Date Reported:	7-24-96
Laboratory Number:	TPH #1746	Sample Matrix:	Soil

Parameter	Result, mg/kg	Detection Limit, mg/kg
Total Recoverable Petroleum Hydrocarbons	68,000	1,000

ND = Not Detectable at stated detection limits.

QA/QC:	QA/QC Sample TPH mg/kg	Duplicate TPH mg/kg	% *Diff.
	4,440	3,640	20

*Administrative Acceptance limits set at 30%.

Method: Modified Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No.4551, 1978

Comments: Production/Separator Pit

P. E. O'Neil
Analyst

J. C. Blagg
Review

BLAGG ENGINEERING, INC.

P.O. Box 87, Bloomfield, New Mexico 87413

Phone: (505)632-1199 Fax: (505)632-3903

**FIELD MODIFIED EPA METHOD 418.1
TOTAL PETROLEUM HYDROCARBONS**

Client:	Duncan Oil	Project #:	
Sample ID:	Center Bottom @ 5'	Date Analyzed:	7-23-96
Project Location:	North Hogback 12#1	Date Reported:	7-24-96
Laboratory Number:	TPH #1747	Sample Matrix:	Soil

Parameter	Result, mg/kg	Detection Limit, mg/kg
-----	-----	-----
Total Recoverable Petroleum Hydrocarbons	59,000	1,000

ND = Not Detectable at stated detection limits.

QA/QC:	QA/QC Sample TPH mg/kg	Duplicate TPH mg/kg	% *Diff.
	-----	-----	-----
	4,440	3,640	20

*Administrative Acceptance limits set at 30%.

Method: Modified Method 418.1, Petroleum Hydrocarbons, Total
Recoverable, Chemical Analysis of Water and Waste,
USEPA Storet No.4551, 1978

Comments: Production/Separator Pit

P. E. O'Neil
Analyst

J. C. Blagg
Review

BLAGG ENGINEERING, INC.

P.O. Box 87, Bloomfield, New Mexico 87413

Phone: (505)632-1199 Fax: (505)632-3903

**FIELD MODIFIED EPA METHOD 418.1
TOTAL PETROLEUM HYDROCARBONS**

Client:	Duncan Oil	Project #:	
Sample ID:	Center Bottom @ 6'	Date Analyzed:	7-23-96
Project Location:	North Hogback 12#9	Date Reported:	7-24-96
Laboratory Number:	TPH #1748	Sample Matrix:	Soil

Parameter	Result, mg/kg	Detection Limit, mg/kg
-----	-----	-----
Total Recoverable Petroleum Hydrocarbons	13,100	100

ND = Not Detectable at stated detection limits.

QA/QC:	QA/QC Sample TPH mg/kg	Duplicate TPH mg/kg	% *Diff.
	-----	-----	-----
	4,440	3,640	20

*Administrative Acceptance limits set at 30%.

Method: Modified Method 418.1, Petroleum Hydrocarbons, Total
Recoverable, Chemical Analysis of Water and Waste,
USEPA Storet No.4551, 1978

Comments: Production/Separator Pit

P. E. O'Neil
Analyst

J. L. Blagg
Review

**QUALITY ASSURANCE / QUALITY CONTROL
DOCUMENTATION**

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8020 AROMATIC VOLATILE ORGANICS QUALITY ASSURANCE REPORT

Client:	QA/QC	Project #:	N/A
Sample ID:	Laboratory Blank	Date Reported:	06-25-96
Laboratory Number:	06-25-BTEX.BLANK	Date Sampled:	N/A
Sample Matrix:	Water	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	06-25-96
Condition:	N/A	Analysis Requested:	BTEX

Parameter	Concentration (ug/L)	Det. Limit (ug/L)
Benzene	ND	0.2
Toluene	ND	0.2
Ethylbenzene	ND	0.2
p,m-Xylene	ND	0.2
o-Xylene	ND	0.1

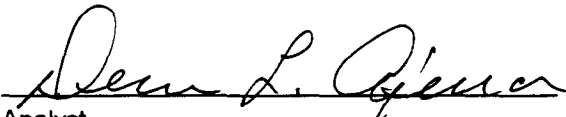
ND - Parameter not detected at the stated detection limit.

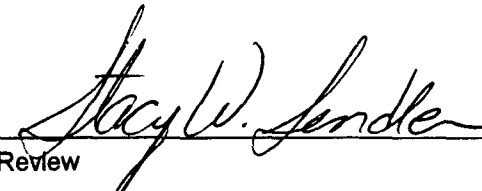
Surrogate Recoveries:	Parameter	Percent Recovery
	Trifluorotoluene	98 %
	Bromofluorobenzene	100 %

References: Method 5030, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Method 8020, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, Sept. 1994.

Comments: QA/QC for samples A271 - A272.


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8020 AROMATIC VOLATILE ORGANICS

Client:	QA/QC	Project #:	N/A
Sample ID:	Matrix Duplicate	Date Reported:	06-25-96
Laboratory Number:	A271	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	Cool	Date Analyzed:	06-25-96
Condition:	Cool and Intact	Analysis Requested:	BTEX

Parameter	Sample Result (ug/Kg)	Duplicate Result (ug/Kg)	Det. Limit (ug/Kg)	Percent Difference
Benzene	ND	ND	11.7	0.0%
Toluene	33.8	33.7	11.1	0.2%
Ethylbenzene	ND	ND	10.1	0.0%
p,m-Xylene	38.1	38.3	14.4	0.6%
o-Xylene	22.9	23.1	6.9	1.1%

ND - Parameter not detected at the stated detection limit.

QA/QC Acceptance Criteria:	Parameter	Maximum Difference
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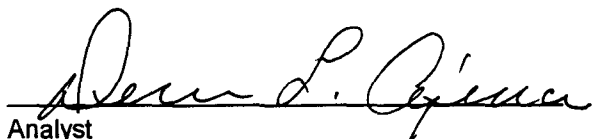
8020 Compounds

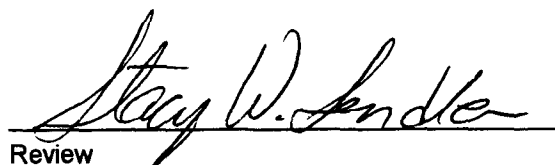
30 %

References: Method 5030, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Method 8020, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, Sept. 1994.

Comments: QA/QC for samples A271 - A272.


Analyst


Review

EPA METHOD 8020
AROMATIC VOLATILE ORGANICS

Client:	QA/QC	Project #:	N/A
Sample ID:	Matrix Spike	Date Reported:	06-25-96
Laboratory Number:	A271	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	Cool	Date Extracted:	06-24-96
Condition:	Cool and Intact	Date Analyzed:	06-25-96

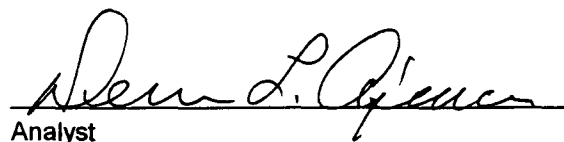
Parameter	Sample Result (ug/Kg)	Spike Added (ug/Kg)	Spiked Sample Result (ug/Kg)	Det. Limit (ug/Kg)	Percent Recovery	SW-846 % Rec. Accept. Range
Benzene	ND	50.0	47.9	11.7	96%	39-150
Toluene	33.8	50.0	81.1	11.1	97%	46-148
Ethylbenzene	ND	50.0	56.2	10.1	100%	32-160
p,m-Xylene	38.1	100	137	14.4	99%	46-148
o-Xylene	22.9	50.0	73.2	6.9	100%	46-148

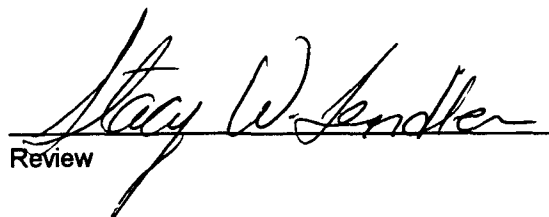
ND - Parameter not detected at the stated detection limit.

References: Method 5030, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Method 8020, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, Sept. 1994.

Comments: QA/QC for samples A271 - A272.


Analyst


Review

EPA Method 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons

Quality Assurance Report

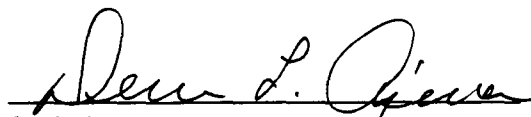
Client:	QA/QC	Project #:	N/A
Sample ID:	Laboratory Blank	Date Reported:	06-25-96
Laboratory Number:	06-25-TPH.BLANK	Date Sampled:	N/A
Sample Matrix:	Methylene Chloride	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	06-25-96
Condition:	N/A	Analysis Requested:	TPH

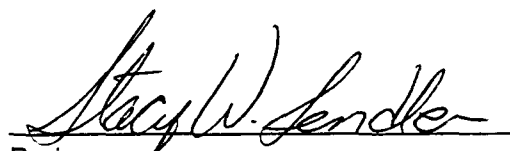
Parameter	Concentration (mg/L)	Det. Limit (mg/L)
Gasoline Range C5 - C10	ND	0.2
Diesel Range C10 - C28	ND	0.1
Total Petroleum Hydrocarbons	ND	0.2

ND - Parameter not detected at the stated detection limit.

References: Method 8015, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Comments: QA/QC for samples A271 - A272.


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons Quality Assurance Report

Client:	QA/QC	Project #:	N/A
Sample ID:	Matrix Duplicate	Date Reported:	06-25-96
Laboratory Number:	A271	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	Cool	Date Analyzed:	06-25-96
Condition:	Cool and Intact	Analysis Requested:	TPH

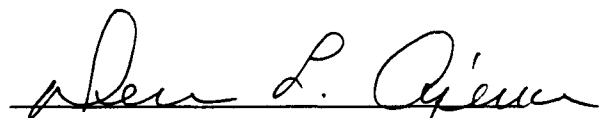
Parameter	Sample Result (mg/Kg)	Duplicate Result (mg/Kg)	Percent Difference
Gasoline Range (C5 - C10)	ND	ND	0.0%
Diesel Range (C10 - C28)	1.4	1.3	2.8%
Total Petroleum Hydrocarbons	1.4	1.3	2.8%


ND - Parameter not detected at the stated detection limit.

QA/QC Acceptance Criteria:	Parameter	Max Difference
	Petroleum Hydrocarbons	30%

References: Method 8015, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Comments: QA/QC for samples A271 - A272.


Analyst


Review

Client:	QA/QC	Project #:	N/A
Sample ID:	Matrix Spike	Date Reported:	06-25-96
Laboratory Number:	A271	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Analysis Requested:	TPH	Date Analyzed:	06-25-96
Condition:	N/A		

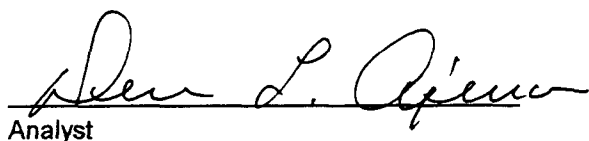
Parameter	Sample Result (mg/kg)	Spike Added (mg/kg)	Spiked Sample Result (mg/kg)	Det. Limit (mg/kg)	Percent Recovery
Gasoline Range (C5 - C10)	ND	250	249	0.2	100%
Diesel Range (C10 - C28)	1.4	250	251	0.1	100%
Total Petroleum Hydrocarbons	1.4	500	500	0.2	100%

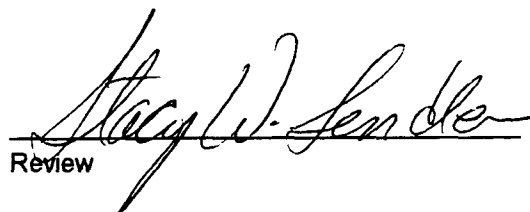
ND - Parameter not detected at the stated detection limit.

QA/QC Acceptance Criteria:	Parameter	Acceptance Range
	Petroleum Hydrocarbons	75 - 125%

References: Method 8015, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Comments: QA/QC for samples A271 - A272.


Analyst


Review

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

QUALITY ASSURANCE REPORT

for EPA Method 8020

Date Analyzed: 2-Jul-96

Internal QC No.: 0444-STD

Surrogate QC No.: 0445-STD

Reference Standard QC No.: 0355-STD

Method Blank

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

Calibration Check

Parameter	Unit of Measure	True Value	Analyzed Value	% Diff	Limit
Benzene	ppb	20.0	19.2	4	15%
Toluene	ppb	20.0	21.9	10	15%
Ethylbenzene	ppb	20.0	18.6	7	15%
m,p-Xylene	ppb	40.0	36.4	9	15%
o-Xylene	ppb	20.0	20.2	1	15%

Matrix Spike

Parameter	1 - Percent Recovered	2 - Percent Recovered	Limit	%RSD	Limit
Benzene	112	129	(39-150)	10	20%
Toluene	111	128	(46-148)	10	20%
Ethylbenzene	112	129	(32-160)	10	20%
m,p-Xylene	109	126	(35-145)	10	20%
o-Xylene	105	121	(35-145)	10	20%

Surrogate Recoveries

Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered	Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered
Limit Percent Recovered	(70-130)		Limit Percent Recovered	(70-130)	
11354-4222	99				
11357-4222	99				
11359-4222	100				
11360-4222	100				

S1: Fluorobenzene

OFF: (505) 325-5667

ON SITE

TECHNOLOGIES, LTD.

LAB: (505) 325-1556

QUALITY ASSURANCE REPORT

for EPA Method 8020

Date Analyzed: 3-Jul-96

Internal QC No.: 0444-STD

Surrogate QC No.: 0445-STD

Reference Standard QC No.: 0355-STD

Method Blank

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

Calibration Check

Parameter	Unit of Measure	True Value	Analyzed Value	% Diff	Limit
Benzene	ppb	20.0	21.6	8	15%
Toluene	ppb	20.0	21.4	7	15%
Ethylbenzene	ppb	20.0	21.3	6	15%
m,p-Xylene	ppb	40.0	41.5	4	15%
o-Xylene	ppb	20.0	21.0	5	15%

Matrix Spike

Parameter	1 - Percent Recovered	2 - Percent Recovered	Limit	%RSD	Limit
Benzene	100	105	(39-150)	3	20%
Toluene	100	103	(46-148)	2	20%
Ethylbenzene	98	102	(32-160)	3	20%
m,p-Xylene	96	100	(35-145)	2	20%
o-Xylene	97	100	(35-145)	2	20%

Surrogate Recoveries

Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered	Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered
Limit Percent Recovered	(70-130)		Limit Percent Recovered	(70-130)	
11355-4222	98				
11356-4222	91				
11358-4222	99				

S1: Fluorobenzene

OFF: (505) 325-5667

ON SITE

TECHNOLOGIES, LTD.

LAB: (505) 325-1556

QUALITY ASSURANCE REPORT

for EPA Method 8020

Date Analyzed: 2-Jul-96

Internal QC No.: 0444-STD

Surrogate QC No.: 0445-STD

Reference Standard QC No.: 0355-STD

Method Blank

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

Calibration Check

Parameter	Unit of Measure	True Value	Analyzed Value	% Diff	Limit
Benzene	ppb	20.0	19.2	4	15%
Toluene	ppb	20.0	21.9	10	15%
Ethylbenzene	ppb	20.0	18.6	7	15%
m,p-Xylene	ppb	40.0	36.4	9	15%
o-Xylene	ppb	20.0	20.2	1	15%

Matrix Spike

Parameter	1 - Percent Recovered	2 - Percent Recovered	Limit	%RSD	Limit
Benzene	112	129	(39-150)	10	20%
Toluene	111	128	(46-148)	10	20%
Ethylbenzene	112	129	(32-160)	10	20%
m,p-Xylene	109	126	(35-145)	10	20%
o-Xylene	105	121	(35-145)	10	20%

Surrogate Recoveries

Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered	Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered
Limit Percent Recovered	(70-130)		Limit Percent Recovered	(70-130)	
11384-4223	97				
11385-4223	96				
11386-4223	99				

S1: Fluorobenzene

CHAIN OF CUSTODY RECORD

6727

Date: 7/2/96

Page 1 of 1

657 W. Maple • P. O. Box 2606 • Farmington NM 87499
LAB: (505) 325-5667 • FAX: (505) 325-6256

Purchase Order No.: 4722/4723		Job No. 7-10010	
Name	ACCUMULANTS PA'ABLE	Company	ON SITE
Address	P.O. BOX 7606	City, State, Zip	FARMINGTON NM 87401
Sampling Location:		DURICANI OIL	
Sampler: RED		ANALYSIS REQUESTED	
SAMPLE IDENTIFICATION		LAB ID	
7-1	ANAL-1	304727	1354-4222
7-1	ANAL-2	304728	11355
7-1	ANAL-3	304729	11356
7-1	ANAL-4	304730	11357
12-9	ANAL-1	304731	11358
17-9	ANAL-2	304732	11359
7-6	ANAL-1	304733	11360
6-6	ANAL-1	304734	1384-4223
6-6	ANAL-2	304735	1385
6-6	ANAL-3	304736	11386
Relinquished by: [Signature]		Date/Time 7-3-96 1115	
Relinquished by:		Date/Time	
Relinquished by:		Date/Time	
Method of Shipment:		Special Instructions: PLEASE FAX THIS UP ASAP	
Authorized by: [Signature]		Date 7/2/96	

Distribution:	White – On Site	Yellow – LAB	Pink – Sampler	Goldenrod – Client
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CHAIN OF CUSTODY RECORD

657 W. Maple • P. O. Box 2606 • Farmington NM 87499
LAB: (505) 325-5667 • FAX: (505) 325-6256

Page

of

of

Distribution: White – On Site Yellow – LAB Pink – Sampler Goldenrod – Client

CHAIN OF CUSTODY RECORD

657 W. Maple • P. O. Box 2606 • Farmington NM 87499
LAB: (505) 325-5667 • FAX: (505) 325-6256

71

of _____

[illegible]

Distribution:	White - On Site	Yellow - LAB	Pink - Sampler	Goldenrod - Client
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BLAGG ENGINEERING, INC.

P.O. Box 87, Bloomfield, New Mexico 87413

Phone: (505)632-1199 Fax: (505)632-3903

33 JAN 1 1996

December 18, 1995

Mr. James D. Walker

Navajo Nation EPA

P.O. Box 1979

Shiprock, NM 87420

Re: Duncan Oil, Inc. - North Hogback Unit Earthen Pit Reclamation Program

Dear Mr. Walker:

Referencing our meeting on October 25, 1995, Navajo Nation EPA requested additional earthen pit evaluations at the southern end of the abandoned North Hogback Unit, San Juan County, New Mexico. Included below is a plan prepared by Blagg Engineering for Duncan Oil to perform the requested supplemental investigation of the extent of hydrocarbon impact at the North Hogback Unit. Additionally included is a request to implement reclamation activities for in-situ treatment of contaminated media.

An initial evaluation of the extent and magnitude of soil and groundwater contamination at the field was performed in June and July, 1995. The results of this testing was presented in a report submitted to the Navajo EPA dated September 14, 1995.

Additional Evaluation of Hydrocarbon Impacts

Duncan Oil, Inc. proposes to determine the vertical extent of hydrocarbon contamination at the most down-gradient earthen pit in the North Hogback Unit. The pit identified for this testing is the North Hogback #7-6 separator pit which is located down-gradient from the remaining earthen pits in the field (Figure 1). The groundwater gradient in the area is indicated to be in a northeast direction based on groundwater data collected from monitor wells placed at the #7-1 and #12-9 well locations. Note that there are no known domestic water supply sources located between the earthen pits in the field and the San Juan River.

There is a severe layer of river cobbles and boulders beginning at the ground surface and extending to an unknown depth. It is proposed to contract a drilling unit to bore or drive a hole through this boulder layer. Soil samples collected while advancing the boring with the rig may not be representative due to the possible use of water that may be required during drilling operations. After penetrating the cobble layer surface conductor pipe will be set in the hole and the boring will be further advanced with a conventional auger type drill unit. Soil samples will be collected at 5 foot intervals and field tested for headspace organic vapor content using a calibrated photo-ionization detector (PID). Certain soil samples may be field tested for total petroleum hydrocarbon (TPH) content using U.S. EPA Method 418.1. Advancement of the boring will be terminated when both

PID and TPH readings are recorded at less than 100 parts per million (ppm).

If groundwater is encountered during advancement of the bore hole, a groundwater monitoring well be set using slotted piping across the water table interface. Following installation the well will be developed by hand bailing until returns are relatively clear of fines. Water samples will be collected into appropriate sample containers supplied by the analytical laboratory, preserved, cooled in an ice chest and then delivered to the laboratory for testing. Proper chain-of-custody documentation will follow the samples.

The initial groundwater sample collected from the well will be submitted for testing of volatile hydrocarbons using U.S. EPA Method 8020, API water analysis for cations/anions and total dissolved solids, nitrates (NO_3) and selenium. Future samples collected from the well will only include analyses for those constituents identified in excess of applicable water quality standards during the initial water testing.

Implementation of In-Situ Reclamation

The assessment report on the North Hogback Unit submitted to the Navajo EPA on September 14, 1995 outlined a recommended earthen pit reclamation program. Navajo EPA authorization of this remediation program is requested. It is proposed to perform in-situ reclamation by enhancing natural bio-degradation with moisture and nutrients (common fertilizer). The initial recommended treatment program is quarterly stimulation of each of the unlined surface pits using 10 barrels of fresh water mixed with nutrients. Effectiveness of the program will be monitored to determine if a change in the volume or frequency of stimulation may be necessary. A pre-treatment sampling of each pit bottom for analysis of TPH will be performed, followed by quarterly sampling for the first year. Note that after the first year annual sampling may be indicated. (Included with this transmittal are several U.S. EPA and industry reports on natural and enhanced biodegradation of hydrocarbons.)

Groundwater at the monitor wells placed at the #7-1, #12-9 and the proposed well at #7-6 will be sampled quarterly during the first year of remediation. Initial water testing will include U.S. EPA Method 8020, API water analysis for cations/anions and total dissolved solids, nitrates (NO_3) and selenium. Future samples will only include analyses for those constituents identified in excess of applicable water quality standards during the initial water testing. Note that annual water testing may be indicated.

Evaluation of Remediation and Assessment Program

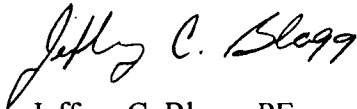
Following well installation and sampling at the #7-6 separator pit location the effectiveness of the test program will be evaluated. Lithology types and thickness, groundwater depth and water quality will be known. Risk assessment of potential impacts at other earthen pit locations can be determined and the reclamation program can be re-evaluated. Note that groundwater testing at the ~~#7-6~~, #7-1 and #12-9 well locations found only trace concentrations of BTEX constituents in groundwater, as reported in the September 14, 1995 report submitted to Navajo EPA. Note also that the proposed

monitor well to be placed at the #7-6 location will be down-gradient from the other pits in the North Hogback Unit and will serve as a field wide down-gradient monitoring point.

The remediation program will be evaluated following the first year of stimulation and testing. If hydrocarbon decay rates indicate probable decline to acceptable regulatory standards, no changes in the remediation program will be initiated. If hydrocarbon decay rates indicate standards will not be achieved, alternative bioremediation processes will be evaluated.

If you have questions or comments concerning this transmittal, Blagg Engineering, Inc. may be contacted at (505)632-1199.

Respectfully,
Blagg Engineering, Inc.



Jeffrey C. Blagg, PE
President

JCB

cc: John Bettridge - Duncan Oil, Inc./w attach.
Bill Liess - BLM/w attach.
James Miles - BIA/wo attach.
William C. Olson - OCD/wo attach.
Linda Taylor - BIA/wo attach.
Denny Foust - OCD/w attach.
John Alexander - Dugan Production Corp/wo attach.

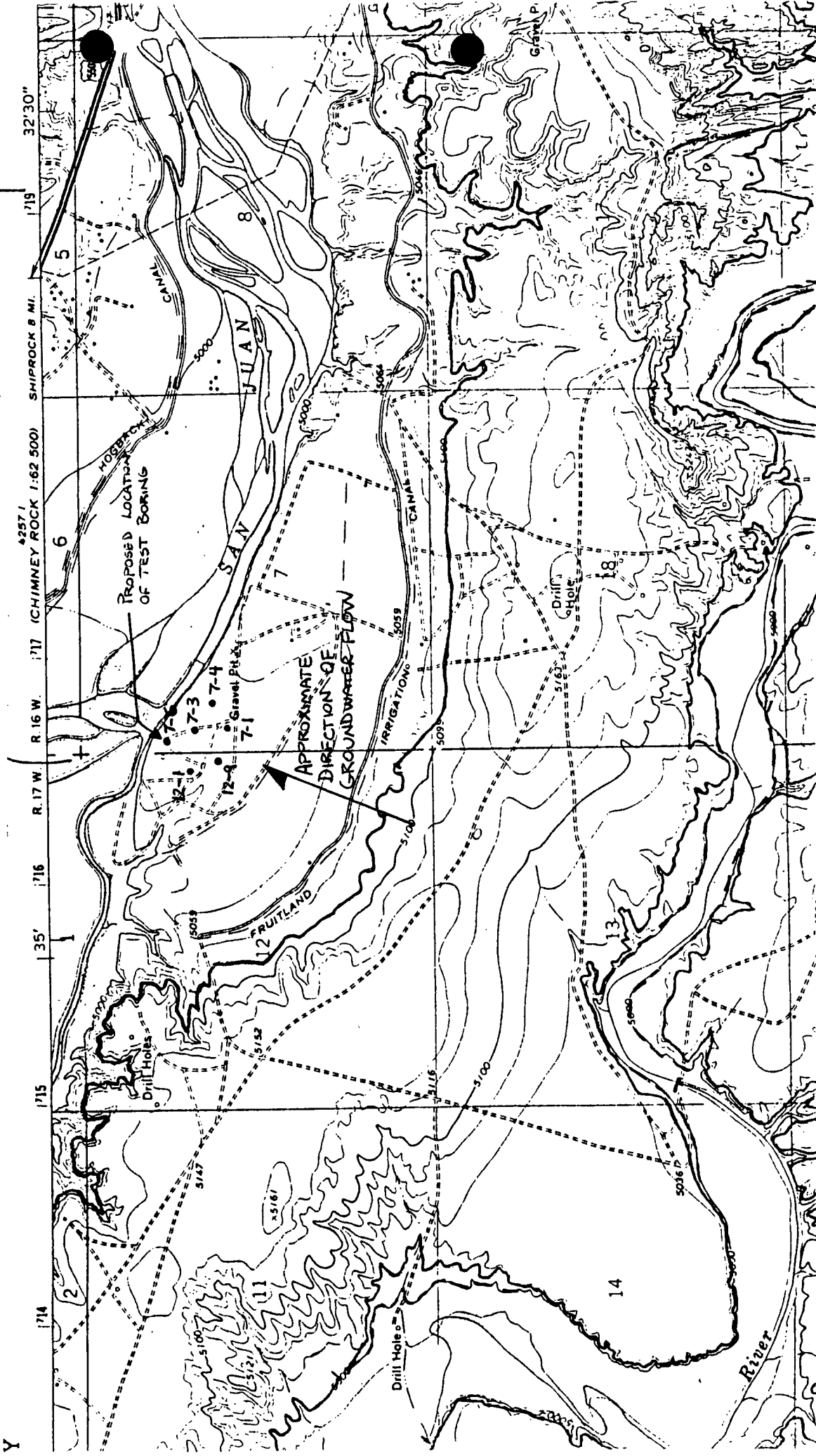
Attachments: Figure 1: Site Topo Sheet
U.S. EPA and Industry Papers on Bioremediation

FIGURE 1

DUNCAN OIL, INC.
NORHT HOGBACK UNIT
(From USGS Topo Sheet)

TERIOR
Y

NORTH



BLAGG ENGINEERING, INC.

P.O. Box 87, Bloomfield, New Mexico 87413

Phone: (505)632-1199 Fax: (505)632-3903

September 14, 1995

RECEIVED

OCT 2 1995

Environmental Bureau
Oil Conservation Division

Mr. James D. Walker
Navajo Nation EPA
P.O. Box 1979
Shiprock, NM 87420

Mr. James Miles
Bureau of Indian Affairs
1400 La Plata Highway
Farmington, NM 87401

Mr. Denny Foust
New Mexico Oil Conservation Division
1000 Rio Brazos Road
Aztec, NM 87410

Mr. William C. Olson
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87504

Mr. Bill Liess
Bureau of Land Management
U.S. Department of the Interior
1235 La Plata Highway
Farmington, NM 87401

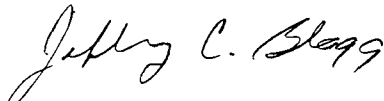
Ms. Linda Taylor
Bureau of Indian Affairs
1400 La Plata Highway
Farmington, NM 87401

Re: Duncan Oil, Inc. - North Hogback Unit Pit Assessments

Enclosed, please find one copy of initial pit assessments for the Duncan Oil, Inc. North Hogback Unit, located on the Navajo Nation in San Juan County, New Mexico. These assessments were conducted pursuant to the Pit Closure Plan submitted by Dugan Production Company and Blagg Engineering, Inc. on March 23, 1995.

If you have additional questions or comments concerning this transmittal, Blagg Engineering, Inc. may be contacted at (505)632-1199.

Respectfully,
Blagg Engineering, Inc.


Jeffrey C. Blagg, PE
President

JCB

See STB main file
for report

cc: John Bettridge - Duncan Oil, Inc.
John Alexander - Dugan Production Corporation