# FINAL CLOSURE REPORT

# Prize Operating Company

# **Skelly Penrose Battery Pit Closure Project**



Whole Earth Environmental 19606 San Gabriel Houston, Tx. 77084



Whole Earth Environmental, Inc.

19606 San Gabriel, Houston, Texas 77084 281/492-7077 • Fax: 281/646-8996



May 2, 2001

New Mexico Oil Conservation Division 1220 South St. Francis Dr. Sante Fe, NM 87505

Attn: Wayne Price

Dear Wayne:

Enclosed, please find a copy of the final closure report for the Skelly / Penrose Battery located near Eunice, New Mexico. I apologize for the delay in getting the thing out but we had a devil of a time scheduling Basin Surveys.

Thank you again for the opportunity of working with you on this project. If you've any questions or comments, please do not hesitate to contact us at 800.854.4358.

Warmest regards,

Mike Griffin President Whole Earth Environmental, Inc.



#### Executive Summary Skelly Penrose Pit Closure Project

#### Location

The emergency pit is situated at the northern end of the Apache Skelly Penrose Central Battery located approximately five miles south of Eunice, New Mexico. The site may accessed by a well maintained lease road intersecting New Mexico State Highway 18. (See attached plat map, Exhibit 1). The legals for the site are S3, T23S, R37E.

#### Topography

The surrounding topography is quite unremarkable. The elevation tends to decline in an easterly and southerly direction with no significant deviations to the mean. There are no surface streams or ponds within five miles of the facility. U.S.G.S. 7.5' maps are provided as Exhibits 2 & 3.

#### Land Use

The primary land use for the surrounding area is petroleum extraction. Secondary usage is the grazing of cattle. There are no agricultural or recreational areas within five miles of the facility.

#### Site History

The pit was installed by Texaco Exploration & Production and was used as an emergency upset facility for the adjacent hydrocarbon storage tanks. The pit was partially lined with a polyethylene liner extending to the surface. Only a small  $(10' \times 10')$  center section at the bottom of the impoundment was left uncovered. The pit contents were primarily produced water with minor hydrocarbon fractions. Over time the lighter end hydrocarbons weathered, producing a thick asphaltine coating over the bottom of the impoundment.

Partial remediation was undertaken in July 1998 by Western Environmental Consultants. The remediation regime consisted of excavating the contaminated soils and liner to a depth of approximately 10' below ground level and spreading the soils to a depth of approximately 6" at a location immediately adjacent to the pit site. Soil borings taken at the center of the pit indicated that the highest concentrations of hydrocarbons and sodium chlorides remain perched at distance of approximately 15'-22' below ground level, (5'-12' below existing pit depth). See Exhibits 4 & 5, Western Environmental Consultants Soil Analysis Report.

Whole Earth Environmental, Inc. extended the excavation depth to a distance of approximately 40' below ground surface where we encountered a dense layer of indurated sandstone making further excavation impossible. The sidewalls and bottom of the excavation were tested and witnessed by both Gary Wink and Donna Williams of the Hobbs office of the NMOCD on January 16, 2000. Split samples were sent to separate laboratories and found to be within the NMOCD guidelines for TPH and BTEX, (see Exhibits 6-10). The chloride concentrations within the split samples were not sufficiently correlative to insure that the vertical extent of migration had been defined.

A 30 mil polyethylene liner was installed within the excavation and brought to within 5' of the surface. The excavated materials were backfilled within the liner and tested for the presence and concentration of BTEX and TPH, (see Exhibits 11-13). A top liner was installed immediately above the backfill and clean top soils filled the excavation to ground level.

Due to the uncertainty regarding the possible migration of contaminants into ground water a monitor well was drilled immediately adjacent to the pit site and completed on July 13, 2000, (see Exhibit 14, drilling log, monitor well # 1). Laboratory analyses of the waters within the monitor well again indicated that BTEX concentrations were at a non-detectable level however the chlorides were well above NMOCD guidelines, (Exhibits 15-17). A retest of the site on November  $15^{th}$  indicated similar results, (Exhibits 18 & 19).

Subsequently, two additional monitor wells were drilled on February 21<sup>st</sup> and an attempt to develop the wells was initiated on the 22<sup>nd</sup> and 23<sup>rd</sup>. The Hobbs office of the NMOCD witnessed the second attempt. Both attempts revealed the presence of a tight clay layer well above the water table. The boring logs and civil survey (Exhibits 20-22) indicate that even though the delineation wells were drilled between 1.5 and 6.5' deeper than the original well, no indication of water was present. The presence of water contained within an orphan pocket immediately below the pit is a direct result of vertical migration of fluids from within the pit. This pocket has no potential to migrate through the dense clay layer into a table of beneficial use.



#### Exhibit Index Prize Operating Company Skelly / Penrose Battery

Exhibit 1. Plat map showing the overall orientation of the battery.

Exhibit 2. Large view U.S.G.S. map showing location of site to general area.

Exhibit 3. Detailed view U.S.G.S. map showing local topography and access.

Exhibit 4. Western Environmental Consultants Soil Analysis Report for chlorides.

Exhibit 5. Western Environmental Consultants Soil Analysis Report for TPH.

Exhibit 6. Environmental Labs of Texas split sample analytical report for TPH from pit bottom.

Exhibit 7. Environmental Labs of Texas split sample analytical report for BTEX from pit bottom.

Exhibit 8. Environmental Labs of Texas split sample analytical report for chlorides from pit bottom.

Exhibit 9. Chain of custody document for the above analytical reports.

Exhibit 10. TraceAnalysis split sample results for the pit bottom.

Exhibit 11. Environmental Labs of Texas analytical report for BTEX from backfill material.

Exhibit 12. Environmental Labs of Texas analytical report for TPH from backfill material.

Exhibit 13. Chain of custody document for the above analytical reports.

Exhibit 14. Atkins Engineering boring log for Monitor Well # 1.

Exhibit 15. July 19 Environmental Labs of Texas BTEX analytical report for water within MW # 1.

Exhibit 16. July 19 Environmental Labs of Texas chlorides analytical report for water within MW # 1.



Exhibit 17. Chain of custody document for the above analytical reports.

Exhibit 18. November 13 Environmental Labs of Texas chlorides analytical report for the retest of water within MW # 1.

Exhibit 19. Chain of custody document for the above analytical report.

Exhibit 20. Basin Surveys location and elevation survey for the three monitor wells.

Exhibit 21. Atkins Engineering boring log for Monitor Well # 2.

Exhibit 22. Atkins Engineering boring log for Monitor Well # 3.













SENT BY : APACHE

O. Box 1810

New Mexico 88241

; 9-13-99 ;10:17AM ;

APACHE→



Phone (505) 392-5021 Fax (505) 397-2597

# Exhibit 4 SOIL ANALYSIS REPORT

DATE: 7-24-98 CLIENT: Apache Corp. SUPERVISOR: A. Hodge Sample Matrix: Soil FACILITY: Skelly Penrose Central Battery Test Method: EPA 418.1 Order No. Don Baucham SAMPLE RECEIVED: Intact on site

		TPH		DEPTH	LOCATION
	SAMPLE NO. 1:	9,410	PPM	10,	Surface of Pit Bottom
	SAMPLE NO. 2:	18,570	PPM	15-17	Center of Pit
	SAMPLE NO. 3:	9,987	PPM	20'-22'	Center of Pit
<b></b> .	SAMPLE NO. 4:	178	PPM	25'-2 <b>7</b> '	Center of Pit
	SAMPLE NO. 5:	104	PPM	30'-32'	Center of Pit
	SAMPLE NO. 6:	81	PPM	35'-37'	Center of Pit
	SAMPLE NO. 7.	16	PPM	40'-42'	Center of Pit
	SAMPLE NO. 8:	11,045	PPM	4"-6"	Composite of stockpiled soils
	SAMPLE NO. 9:		PPM		
	SAMPLE NO. 10:		PPM		

COMMENTS: These samples were taken using a Hollow Stem Auger and split spoon to sample. These samples were taken to define the vertical impact of Total Petroleum Hydrocarbons at the central battery pit. Sample # 7 was split and sent to a third party lab to confirm TPH and BTEX levels. Sample # 8 was a composite sample taken from the stockpiled soils that have been placed on plastic at the central battery. SENT BY: APACHE

; 9-13-99 ;10:17AM ;

APACHE-



Phone (505) 392-5021 Fax (505) 397-2597

### Exhibit 5

WESTERN NVIRONMENTAL

CONSULTANTS

# SOIL ANALYSIS REPORT

DATE: 7-24-98 CLIENT: Apache Corp. SUPERVISOR: A. Hodge Sample Matrix: Soil FACILITY: Skelly Penrose Central Battery Test Method: EPA 325.3 Order No. Don Baucham SAMPLE RECEIVED: Intact on site

		CL		DEPTH	LOCATION
	SAMPLE NO. 1	2,000	PPM	10'	Surface of Pit Bottom
	SAMPLE NO. 2:	12,000	PPM	15'-17'	Center of Pit
)	SAMPLE NO 3:	7,500	PPM	20'-22'	Center of Pit
	SAMPLE NO. 4:	2,800	ррм	25'-27'	Center of Pit
	SAMPLE NO 5.	1,000	ррм	30'-32'	Center of Pit
	SAMPLE NO. 6:	<500	PPM	35' <b>-3</b> 7'	Center of Pit
	SAMPLE NO. 7.	<500	PPM	40'-42'	Center of Pri
	SAMPLE NO. 8:		ррм		
	SAMPLE NO. 9:		PPM		
	SAMPLE NO. 10:		PPM		

COMMENTS: These samples were taken using a Hollow Stem Auger and split spoon to sample. These samples were taken to define the vertical impact of chlorides at the central battery pit. Sample # 7 was split and sent to a third party lab to confirm CL levels.



WHOLE EARTH ENVIRONMENTAL ATTN: MR. MIKE GRIFFIN 19606 SAN GABRIEL HOUSTON, TEXAS 77084 FAX: 1-281-646-8996

Sample Type: Soil Sample Condition: Intact/Iced Project #: Apache Eunice Project Name: None Given Project Location: None Given		Exhibit 6		Sampling Date: 01/14/00 Receiving Date: 01/16/00 Analysis Date: 01/19/00
-		GRO	DRO	
		C8-C10	>C10-C28	
ELT#	FIELD CODE	mg/kg	mg/kg	
22857	Apache Split	<10	42	

% IA	96	83
%EA	102	MI
BLANK	<10	<10

MI = matrix interference

Methods: EPA SW 848-8015M GRO/DRO

Ralandk Jusik Raland K Tuttle

1-20-00

Date



WHOLE EARTH ENVIRONMENTAL ATTN: MR. MIKE GRIFFIN 19606 SAN GABRIEL HOUSTON, TEXAS 77084 FAX: 1-281-646-8996

### Exhibit 7

Sampling Date: 01/14/00 Receiving Date: 01/18/00 Analysis Date: 01/18 & 01/19/00

cation: None Given					
FIELD CODE/ DATE	BENZENE 	TOLUENE maika	ETHYLBENZENE mg/kg	m.p-XYLENE	o-XYLENE mg/kg
Apache Split	<0.100	0.116	<0.100	0.137	<0.100
- IA	94	91	89	91	88
	94	89	87	88	87
	<u>FIELD CODE/ DATE</u> Apache Split	Apache Split <0.100	BENZENE TOLLIENE FIELD CODE/ DATE marka marka Apache Split <0.100 0.116 IA 94 91 EA 94 89 LANK <0.100 <0.100	BENZENE TOLUENE ETHYLBENZENE   FIELD CODE/ DATE marka marka marka   Apache Split <0.100	BENZENE     TOLUENE     ETHYLBENZENE     m.p-XYLENE       FIELD CODE/ DATE     mg/kg     mg/kg     mg/kg     mg/kg     mg/kg       Apache Split     <0.100

METHODS: SW 846-80218,5030

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SampleType: Soil

Sample Condition: Intact/ loed

Project #: Apache Eunice

Project Name: None Given

<u>1-20-00</u>



#### WHOLE EARTH ENVIRONMENTAL ATTN: MR. MIKE GRIFFIN 19606 SAN GABRIEL HOUSTON, TEXAS 77084 FAX: 1-281-846-8996

Sample Type: Soil Sample Condition: Intact/Iced Project #: Apache Eunice Project Name: None Given **Project Location: None Given** 

Sampling Date: 01/14/00 Receiving Date: 01/16/00 Analysis Date: 01/19/00

ELT#	FIELD CODE	Thioride mg/kg
22857	Apache Split	975

5140

5000

103

<10

Exhibit 8

QUALITY CONTROL	
TRUE VALUE	
% PRECISION	
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Methods: EPA SW 846-9052

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-20-00

Date

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Report Date:	1/21/00	Order ID Number: A00011503	Page Number: 2 of 6
N/A		Apache-Skelly	N/A

#### Analytical Results Report

Description	0114001330					•					
Param	0111001230	Flag	Result	Dilution	Analytical Method	iline Prepared	Dasc Analyzed	Analyst	Prep Unich #	QC Butch #	RDL
BTEX (mg/Kg)						· · · · · · · · · · · · · · · · · · ·					
Benzene			<0.05	50	S 8021B	1/19/00	1/19/00	RC	(*1300.140)	OC00449	0.001
Tolucae			<0.05	50	S 8021B	1/19/00	1/19/00	RC	14900340	QC00449	0.001
Ethylbenzene			<0.05	50	S \$021B	1/19/00	1/19/00	RC	PB00340	QCIRI449	0.001
M.P.O-Xylene			<0 95	50	S \$021B	1/19/00	1/19/00	RC.	PB00340	QC00449	0.001
Total BTEX			<0.05	50	5 60218	1/19/00	1/19/00	RC	PR00340	QC00449	0.001
Surrogate (mg/Kg	<b>y</b>		Result	Dilution	Spike Amount	% Kcc.	% Rec. Limit	Analyst	Prep Batch #	QC Betch#	
TEL			4.97	50	0.1	99	72 - 128	RC	FR00340	QC00449	
4-BFR			5.1	50	Q.1	102	72 - 128	RC	<b>PB0034</b> 0	QC00449	
ion Chromolography	y (IC) (mg/Kg)										
CL			34 <b>0</b> 0	1	E <b>300</b> .0	1/17/00	1/19/00	18	P1400338	QC00445	U.\$
TPH DRO (mg/Kg DRO	U .	٠	134	T	Mod. 8015B	1/17/00	1/17/00	MF	PR08299	QC00413	50
* DRO - Hydrocar	bons present past C2	8.									
TPH GRO (mg/Kg GRO	¢		-5	ł	801 <i>5</i> 18	1/19/00	1/19/00	RC	P90034}	QC00450	0.1

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

WHOLE EARTH ENVIRONMENTAL ATTN: MR. MIKE GRIFFIN 19606 SAN GABRIEL HOUSTON, TEXAS 77084 FAX: 1-281-646-8996

### Exhibit 11

Sampling Date: 03/06/00 Receiving Date: 03/08/00 Analysis Date: 03/09/00

SampleType: Soil Sample Condition: Intact/ Iced Project #: Apache / B-52 Project Name: None Given Project Location: Eunice, N.M.

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE	m.p-XYLENE mg/kg	o-XYLENE mg/kg	
24056	1st 3' Lift	<0.100	<0.100	<0.100	0.104	<0.100	
24057	2nd 3' Lift	<0.100	<0.100	<0.100	0.123	<0.100	
24058	3rd 3' Lift	<0.100	<0.100	<0.100	<0.100	<0.100	
24059	4th	<0.100	<0.100	<0.100	<0.100	<0.100	
24060	5th	<0.100	<0.100	<0.100	<0.100	<0.100	
24061	6th	<0.100	<0.100	<0.100	<0.100	<0.100	
24062	7th	<0.100	<0.100	<0.100	<0.100	<0.100	
24063	8th	<0.100	<0.100	<0.100	<0.100	<0.100	
24064	9th	<0.100	<0.100	<0.100	<0,100	<0.100	
24065	10th	<0.100	<0.100	<0.100	<0.100	<0.100	
24066	11th	<0.100	<0.100	<0.100	<0.100	<0.100	
	% I <b>A</b>	101	98	95	96	94	
	% EA	98	94	90	91	92	
	BLANK	<0.100	<0.100	<0.100	<0.100	<0.100	

METHODS: SW 846-8021B,5030

Calad K Tuttle

3-10-00



#### WHOLE EARTH ENVIRONMENTAL ATTN: MR. MIKE GRIFFIN 19606 SAN GABRIEL HOUSTON, TEXAS 77084 FAX: 1-281-646-8996

Sample Type: Soil Sample Condition: Intact/load Project #: Apache / B-52 Project Name: None Given Project Location: Eunice, NM

Exhibit 12

Sampling Date: 03/06/00 Receiving Date: 03/08/00 Analysis Date: 03/09/00

		GRO C6-C10	DRO >C10-C28	
ELT#	FIELD CODE	mg/kg	mg/kg	
24056	1st 3' Lift	<10	826	
24057	2nd 3' Lift	<10	1046	
24058	3rd 3' Lift	<10	674	
24059	4th	<10	401	
24060	5th	<10	590	
24061	6th	<10	634	
24062	7th	<10	137	
24063	8th	<10	417	
24064	9th	<10	393	
24065	10th	<10	450	
24066	11th	<10	618	
	% IA	96	101	
	%EA	92	97	
	BLANK	<10	<10	

Methods: EPA SW 846-8015M GRO/DRO

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3-10-00

Date

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WHOLE EARTH ENVIRONMENTAL ATTN: MR. ELLIOT WERNER 19806 SAN GABRIEL HOUSTON, TEXAS 77084 FAX: 1-281-646-8996

#### Exhibit 15

Sample Type: Water Sample Condition: Intact/ iced/ 36 deg. F Project #: Apache Project Name: None Given Project Location: Eunice Skelly Penrose Sampling Date: 07/19/00 Receiving Date: 07/19/00 Analysis Date: 07/20/00

<u>EL7#</u>	FIELD CODE	BENZENE mo/L	TOLUENE mg/L	ETHYLBENZENE	m.p-XYLENE mg/L	o-XYLENE <u>mari</u>	
28314	<b>MW-1</b>	<0.001	<0.001	<0.001	<0.001	<0.001	
%	, IA	95	94	94	105	95	
%	EA	93	90	92	103	93	

<0.001

< 0.001

METHODS: SW 846-8021B,5030

<0.001

led K June

7-20-00 Date

< 0.001

<0.001

Raiand K. Tuttle

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WHOLE EARTH ENVIRONMENTAL ATTN: MR. ELLIOT WERNER 19606 SAN GABRIEL HOUSTON, TEXAS 77084 FAX: 1-281-646-8996

Sample Type: Water Sample Condition: Intact/ iced/ 36 deg. F Project #: Apache Project Name: None Given Project Location: Eunice Skelly Penrose

Sampling Date: 07/19/00 Receiving Date: 07/19/00 Analysis Date: 07/20/00

ELT#	FIELD CODE	Chloride mg/L	
28314	MW-1	3687	•

Exhibit 16

QUALITY CONTROL	5211
TRUE VALUE	5000
% PRECISION	104
BLANK	<5

Methods: EPA 325.3

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7-20-00



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1/281	MW 1	· · · · ·	1	<u>,</u>	<u>, </u>	2		5	2			-	-	1)	> 	-	-]			
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WHOLE EARTH ENVIRONMENTAL ATTN: MR. MIKE GRIFFIN 19606 SAN GABRIEL HOUSTON, TEXAS 77084 FAX: 281-646-8996

### Exhibit 18

Sampling Date: 11/13/00 Receiving Date: 11/15/00 Analysis Date: 11/15/00

Sample Type: Water Sample Condition: Intact/ Iced/ 3.5 deg C Project #: None Given Project Name: Skelly-Penrose MW #1 Project Location: Eunice, N.M.

ELT#	FIELD CODE	 Chioride mg/L	
33887	MW #1	3270	

QUALITY CONTROL	5140
TRUE VALUE	5000
% PRECISION	103
BLANK	<10

METHODS: EPA 325.3

Pula de punt Raland K. Tuttle

1/-20 -00 Date



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