Stantec Consulting Services Inc.
11311 Aurora Avenue
Des Moines, Iowa 50322
Phone: (515) 253-0830

REVIEWED
By Mike Buchanan at 3:20 pm, Sep 18, 2024

July 1, 2024

Mr. Michael Buchanan, Environmental Specialist
New Mexico Oil Conservation Division
Energy, Minerals and Natural Resources Department
5200 Oakland Avenue, NE, Suite 100
Albuquerque, NM 87113

RE: Monitoring Well and Soil Boring Installation and SVE Testing Activities Work Plan
Blanco Plant – Former North Flare Pit Site
El Paso CGP Company
NMOCD Incident Number nAUTOfCS000155

Mr. Buchanan:

Stantec Consulting Services Inc. (Stantec), on behalf of El Paso CGP Company, LLC (EPCGP), is submitting the enclosed Monitoring Well and Soil Boring Installation and Soil Vapor Extraction (SVE) Testing Work Plan (Work Plan) for the Blanco Plant – North Flare Pit Site (Site). The enclosed document contains the proposed methodology for installing three monitoring wells (MWs), one monitoring point (MP), two soil borings (SBs), and conducting SVE testing to recover hydrocarbons, including light non-aqueous phase liquid (LNAPL), at the Site. The procedures outlined in this Work Plan meet or exceed the requirements established in EPCGP's "Remediation Plan for Groundwater Encountered during Pit Closure Activities" document approved by the New Mexico Oil Conservation Division (NMOCD) on November 30, 1995. The work is currently scheduled for implementation in Summer 2024.

Please contact Mr. Joseph Wiley of EPCGP at (713) 420-3475, or me, if you have any questions or comments concerning the enclosed Work Plan.

Sincerely,

Stantec Consulting Services Inc.

Stephen Varsa
Project Manager
Phone: (515) 251-1020
steve.varsa@stantec.com

Monitoring Well and Soil Boring Installation and SVE Testing Activities Work Plan to commence on 08/21/204 and concluded on 08/23/2024. Sufficient notice was proved by Santec on behalf of El Paso CGP Company: work plan is satisfactory.
1. Please update permits obtained from the OSE office and submit through the online portal for the file record.
2. Include soil analytics for soil borings in the 2024 annual report.
3. Include well boring logs in the results section of the next annual report submission, along with PID readings, lithologic descriptions, and well construction details.
4. Include TO-15 and TO-3 air sample data in the next SVE report/or GW report

/rm:

cc: Joseph Wiley, EPCGP (via electronic mail)
United States Bureau of Land Management (Grant NMNM135011)

El Paso CGP Company, LLC
1001 Louisiana
Houston, Texas 77002

Blanco Plant – Former North Flare Pit Site
NMOCD Incident Number: nAUTOfCS000155
2024 MONITORING WELL AND SOIL BORING INSTALLATION AND SVE TESTING WORK PLAN
BLOOMFIELD, NEW MEXICO

July 2024

Prepared by:

Stantec Consulting Services Inc.
11311 Aurora Avenue
Des Moines, Iowa 50322
(515) 253-0830

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SECTION 1 - INTRODUCTION

The Blanco Plant Former North Flare Pit Site (Site) is located approximately 1.5 miles northeast of central Bloomfield, New Mexico, on land controlled by the U.S. Bureau of Land Management (BLM). The Site is located north of San Juan County Road 4900, on a portion of the Blanco Gas Plant operated by Enterprise Products and used for gas gathering activities with no active gas processing. On the south side of San Juan County Road 4900 is the main Blanco Gas Plant facility. The main Blanco Gas Plant facility is primarily owned and operated by Enterprise Products. El Paso Natural Gas Company (EPNG) operates natural gas compression facilities in one area of the main Blanco Gas Plant.

This Monitoring Well and Soil Boring Installation and Soil Vapor Extraction (SVE) Testing Work Plan (Work Plan) presents the scope of work to install three monitoring wells (MWs) and one monitoring point (MP), advance and abandon two soil borings (SBs), and conduct SVE testing activities at the Site. Previous monitoring using the existing monitoring well network indicates measurable light non-aqueous phase liquid (LNAPL) has been found in MW-32, MW-47, MW-58, MP-1, and TW-2 and manual LNAPL recovery has been conducted. Two new monitoring wells MW-61 and MW-62 are proposed as additional monitoring and hydrocarbon delineation locations, one new monitoring point MP-5 is proposed to evaluate radius of influence monitoring during SVE testing, and two new soil borings SB-9 and SB-10 are proposed for further assess subsurface hydrocarbons. One new monitoring well, MW-63, is proposed to provide site-specific background groundwater data for nitrate, in addition to confirming the extent of hydrocarbons in this direction. SVE testing is proposed to further evaluate the feasibility of SVE technologies at the Site. The locations of proposed monitoring wells, monitoring point, and soil borings are depicted on Figure 1.

The purpose of this Work Plan is to provide the field methods and anticipated schedule for the drilling and installation activities and SVE testing. Section 2 describes the Site and the purpose behind the proposed monitoring well, monitoring point, and soil boring locations. Section 3 provides details on the field methods to be used for drilling and monitoring well installation and the SVE testing. Section 4 presents the anticipated implementation schedule.

SECTION 2 - SCOPE OF WORK

Proposed monitoring wells MW-61 and MW-62 are intended to provide additional monitoring locations to confirm the extent of hydrocarbons, including LNAPL, near the former flare pit. Proposed monitoring well MW-63 is intended to provide a monitoring point for collecting site-specific background data for nitrate, in addition to confirming the extent of hydrocarbons in this direction. Proposed monitoring point MP-5 is intended to monitor radius of influence during the SVE testing activities. Proposed soil borings SB-9 and SB-10 are intended to further delineate subsurface hydrocarbons around the former flare pit. Performance of SVE step tests on selected monitoring wells is intended to evaluate the effectiveness of SVE technologies to recover hydrocarbons at the Site in an effort to move the Site towards closure. There are currently twenty-two monitoring wells, four test wells (TWs), and three monitoring points (MPs) at the Site. The existing well network and proposed wells (MW-61, MW-62, and MW-63), proposed monitoring point MP-5, and soil borings (SB-9 and SB-10), are depicted in Figure 1.

Prior to initiating field activities, the following tasks will be completed:

1) A permit for the installation of MW-61, MW-62, MW-63, and MP-5, and advancement of soil borings SB-9 and SB-10, will be obtained from the New Mexico Office of the State Engineer (NMOSE).
2) A pollution control and recovery permit will also be obtained from the NMOSE to allow for the potential recovery of water during the SVE testing activities. The permit will be tied to the NMOSE-assigned Point of Diversion (POD) associated with existing monitoring wells MW-32, MW-47, MW-58 and monitoring point MP-1. Any liquids recovered during the SVE testing activities will be recovered to a single tank or drum, which will be metered.
3) Utility locates will be made through New Mexico 811 to locate and mark member utilities in the vicinity of the three new monitoring wells and two new soil borings.
4) Notifications will be made to the BLM, facility operator Enterprise Products, and the New Mexico Oil Conservation Division prior to mobilization.

Stantec's SVE testing contractor, CalClean Inc., (CalClean), has obtained a No Permit Required determination for emissions from remediation equipment to be utilized during the SVE tests from the New Mexico Environmental Department (NMED). A copy of the NMED letter is included as Appendix A.

SECTION 3 - FIELD METHODS

The following subsections describe field procedures to be followed during the Site activities.

3.1 SOIL BORING

The location of each proposed monitoring well, monitoring point, and soil boring will be staked by Stantec prior to completing 811 utility locates and clearance. A Stantec geologist will oversee the utility clearance activities. The final locations of the soil borings, monitoring point and monitoring wells may be adjusted based on the results of the public utility or private utility survey activities. Once underground utility locating activities have been completed, hydro-excavation equipment will be used to clear the well and boring locations to a depth of at least 10 feet below ground surface (bgs) prior to advancing drill tooling. Each cleared location will be covered with wooden or steel plates and marked "hole" until well or boring advancement begins.

Following the completion of utility clearance activities, a truck-mounted, rotosonic drill rig will be mobilized and used to advance each monitoring well, monitoring point, and soil boring to the target depths noted on Figure 1. A Stantec geologist will oversee the drilling activities, complete soil sample logging, retain samples for laboratory analysis, and document well construction. Soil sampling will be performed to the termination depth of each boring to log and document lithology and determine proper well screen intervals. Borehole logging will include Unified Soil Classification System (USCS) soil descriptions along with a detailed description of each discrete lithologic unit. Soil samples will be collected for field screening at one (1)-foot intervals from cores recovered at approximately 10-foot intervals. After the sample core is collected, field personnel will field screen using a pre-calibrated photoionization detector (PID) and record the readings. The field screen will be conducted by notching the soil in the core with a hand trowel or other pre-cleaned hand tool, and briefly placing the PID in the notch to measure the PID response.

The field screening data, in addition to visual and olfactory observations (e.g., observing apparent hydrocarbon staining), will aid in identifying sample interval(s) to be retained for potential laboratory analysis (i.e., suspected of having a hydrocarbon impact). At a minimum, one soil sample will be retained from each soil boring from the interval exhibiting the highest field screening reading and/or the interval immediately above the field-interpreted water table. Retained soil samples will be placed in a laboratory-provided four (4)-ounce glass jar, sealed, labeled, and stored on ice.

After the boring and soil screening are completed, the retained soil samples will be shipped in an ice-filled cooler under standard chain-of-custody protocol to Eurofins Environment Testing Southeast, LLC (Eurofins), in Pensacola, Florida. Samples not retained and submitted for laboratory analysis will be disposed of with the soil cuttings. The submitted soil samples will be analyzed for the presence of benzene, toluene, ethylbenzene, and total xylenes (BTEX) by United States Environmental Protection Agency (EPA) Method SW846 8260B, gasoline-range organics, diesel-range organics, and oil-range organics by EPA Method 8015 M, and chlorides by EPA Method 300.

Following advancement, soil borings not being completed as monitoring wells or monitoring points will be plugged and abandoned in accordance with the existing Plan of Abandonment for the Site (Plan) issued in 2017 by the Office of the State Engineer (OSE), and the NMED's Ground Water

Quality Bureau Monitoring Well Construction and Abandonment Guidelines dated March 2011. The ground surface at each location will be restored to be compatible with the surrounding ground surface. Following completion of the project, Form WD-11, Plugging Record, will be submitted for the soil borings to the OSE, with copies provided to the BLM along with an updated site plan.

3.2 MONITORING WELL INSTALLATION

The planned total depth of the proposed monitoring wells and monitoring point is 65 feet bgs. Each monitoring well will be constructed with 20 feet of four (4)-inch diameter, Schedule 40, 0.010-slot PVC screen and four (4)-inch diameter, schedule 40 PVC riser casing. The monitoring point will be constructed with 20 feet of two (2)-inch diameter, Schedule 40, 0.010-slot PVC screen and two (2)-inch diameter, schedule 40 PVC riser casing. The proposed screened depths are intended to intersect the water table with 13 feet of screen submerged and seven (7) feet of screen above the water table. The annular space adjacent to the well screen will be filled with 10-20 silica sand from the bottom of the borehole to two (2) feet above the top of the screen. Three (3) feet of hydrated bentonite chips will be placed above the silica sand to prevent downward migration of surface water. Bentonite grout will be placed above the bentonite chips to one (1)-foot bgs.

For each monitoring well and the monitoring point, a locking, protective steel stick-up well casing will be installed within a concrete pad on the ground surface from approximately 3 feet above ground surface to 2 feet bgs. Water-tight gripper plugs will be placed on the top of the monitoring well risers. Following installation, the well completions and any protective bollards will be painted safety-yellow, and the well identifiers stenciled on the stick-up completions. The newly installed wells will be secured with zip-ties.

Well development will be performed using well surging and bailing until sediment has been removed and visibly clear water is observed or the well runs dry. Decontamination and development water will be containerized and placed in a tank or drum.

If LNAPL is not encountered; following development, a HydraSleeve™ no-purge groundwater sampler and tether will be placed in each of the new monitoring wells. The sampler will be placed approximately five (5) feet below the field-apparent water table.

The top-of-casing and ground surface elevations and locations of the newly installed monitoring wells will be surveyed-in by a New Mexico-licensed surveyor. The surveyor will also update the site plan with the locations of identified utilities not included in previous surveys.

3.3 SVE TESTING ACTIVITIES

Stantec will retain the services of CalClean to mobilize and provide equipment and personnel to perform SVE step tests on selected monitoring wells MW-32, MW-47, MW-58, and monitoring point MP-1, planned for late summer 2024. Depending on the observations during advancement of monitoring wells MW-61 and MW-62, SVE step testing may also be performed on these new monitoring wells. All equipment is portable and will not be left at the Site following the SVE testing activities.

CalClean's system consists of a truck-mounted liquid ring-seal pump vapor extraction and treatment system capable of an air flow in excess of 400 cubic feet per minute (cfm) at vacuums reaching 29 inches of mercury (in Hg). Testing manifolds equipped with vacuum gauges and flow measuring and sampling ports will be utilized, and CalClean will provide the metering equipment (i.e., organic vapor analyzer, flow meters, magnehelic gauges, etc.) needed to complete the testing. Recovered vapors will pass through and be treated using a thermal oxidizer before discharge to the atmosphere. Using this method, typical vapor destruction efficiencies are greater than 99%.

Each of these monitoring wells are located within the hydrocarbon plume and have a sufficient amount of well screen above the water table to facilitate testing. Depending on the apparent hydrocarbon impacts encountered during monitoring well advancement activities, monitoring wells MW-61 and MW-62 may also be tested. The SVE test on each monitoring well will be conducted for approximately 4 hours, with vacuum rates incrementally increased during the test. Extraction well flow and vacuums will be collected in addition to off-gas concentration data to evaluate potential emission rates. Recovered vapors will pass through and be treated using a thermal oxidizer before discharge to the atmosphere. Using this method, typical vapor destruction efficiencies are greater than 99%.

To aid in evaluating potential off-gas emissions for a full-scale soil vapor extraction system, influent vapor samples will be collected using Summa canisters from extraction wells MP-1, MW-47, and MW-58 prior to completion of feasibility testing at those locations. In conjunction with the samples, additional Summa samples will also be collected after the thermal oxidizer to document treatment efficiency. The Summa samples will be submitted to Eurofins for analysis of BTEX constituents using Method TO-3, and Total Petroleum Hydrocarbons using Method TO-15. Vacuum influence data will also be collected from nearby monitoring points and monitoring wells to evaluate influence away from each extraction well.

3.4 GENERAL PROTOCOLS

This subsection presents a discussion of health and safety, documentation procedures, buried piping or utility identification, waste handling, and other procedures to be performed as part of the investigation.

3.4.1 Health and Safety

A Site-Specific Health and Safety Plan (HASP) will be prepared for groundwater monitoring, operations, maintenance, drilling, and SVE testing activities. The HASP includes guidance on the personal protective equipment (PPE) necessary for field activities, identified hazards associated with the field activities, and directions to the nearest medical facility. Flame-resistant clothing and Level D protective equipment will be worn, as required. A copy of the HASP will be on site at all times while work is being performed. The HASP will apply to Stantec employees, Stantec's subcontractors, and visitors at the Site. Typically, subcontractors will operate under their own HASP, which will be reviewed and referenced by Stantec prior to the start of the project.

3.4.2 Documentation Procedures

Data generated during the field investigation will be recorded on a boring and well construction log. The boring log will include USCS descriptions, detailed lithologic descriptions, PID readings, length/percent recovery, sample collection intervals, and drilling method employed. The well construction log will include screen, sand pack, wellbore seal, and surface completion details.

The field geologist will maintain a field log book. At the end of each day of field activities, the notes will be dated and signed by the field geologist.

The daily field log book will contain information such as:

- Date
- Name, location, and objective of the work activities
- Weather conditions
- Equipment calibration information
- Personnel and visitors on site
- Photograph numbers and descriptions (if applicable)
- Description of decontamination activities (if applicable)
- Any deviations from the Work Plan
- Other relevant observations as the fieldwork progresses
- Sample collection intervals and times
- Problems and corrective actions

3.4.3 Boring Locations and Utility Identification

Prior to any drilling, a call will be made to the New Mexico 811 "One Call" to verify utility clearance and to notify the operator. "One Call" will be notified that the boring locations are staked or flagged and that the entire well pad and areas surrounding the borings should be marked. The clearance call must be made at least two working days prior to drilling, and site work must be completed within fourteen days of the clearance. In addition, access will be coordinated with the current operator of the Site prior to any drilling activities to allow location of any underground infrastructure and to comply with operator safety guidance.

3.4.4 Equipment Decontamination

Prior to drilling, down-hole equipment will be steam cleaned or scrubbed with a non-phosphate detergent (e.g., Liquinox®). Where feasible, equipment to be decontaminated will be disassembled to permit adequate cleaning of the internal portions of the equipment. Equipment to be steam cleaned will be placed into a self-contained decontamination trailer with metal cleaning racks that support the equipment for cleaning, rinsing, and air drying. Heavy waterproof gloves will be worn during steam cleaning to protect against skin contact with steam and potential contaminants and to reduce the potential for cross-contamination between samples.

3.4.5 Investigation-Derived Waste

Soil cuttings generated from drilling activities will be containerized in a lined roll-off and staged on site. Decontamination and development water generated during drilling activities will be

containerized during generated and transferred to drums. The roll-off and drummed liquids will be removed by a contracted transport and disposal company for off-site disposal at the Envirotech land-farm facility. Hydrovac spoils generated during utility clearance activities will be removed by the hydrovac contractor upon completion and transported to the Envirotech land-farm facility for disposal.

Any liquids recovered during the SVE testing will be stored in a drum and staged on site. After the SVE testing is completed, the drum will be removed from the Site and transported to the Envirotech landfarm facility for disposal.

Other investigation-derived wastes (i.e., excess well materials, bags, buckets, gloves) will be removed from the Site by the waste hauler for disposal as general construction/demolition debris.

Disposable equipment and PPE waste generated during field activities, including scrap PVC, concrete, steel, rope, disposable bailers, nitrile gloves, and Tyvek® suits, will be disposed in standard industrial dumpsters. In the event the waste is grossly contaminated, it will be containerized for proper disposal along with the other investigation-derived waste.

3.4.6 Field Equipment Calibration Procedures

With regard to organic vapor meters, field personnel will use a 10.6 electron volt (eV) PID for screening soil samples during advancement of the soil borings. During the MDPE event, periodic ambient air monitoring will be conducted with a PID and explosimeter. Monitoring instruments will be calibrated prior to use according to the manufacturer's specifications. Calibration information will be recorded in the field log book.

SECTION 4 - SCHEDULE

It is currently anticipated that drilling and installation activities for the three monitoring wells, monitoring point, and two soil borings will commence in July 2024 and require 8 days to complete. The anticipated scheduled start of the SVE testing is late August 2024. Utility locates must be verified prior to the work.

The results of the soil analytical results and SVE testing will be documented in the 2024 Annual Report, and is anticipated to be submitted by April 1, 2025.

FIGURE

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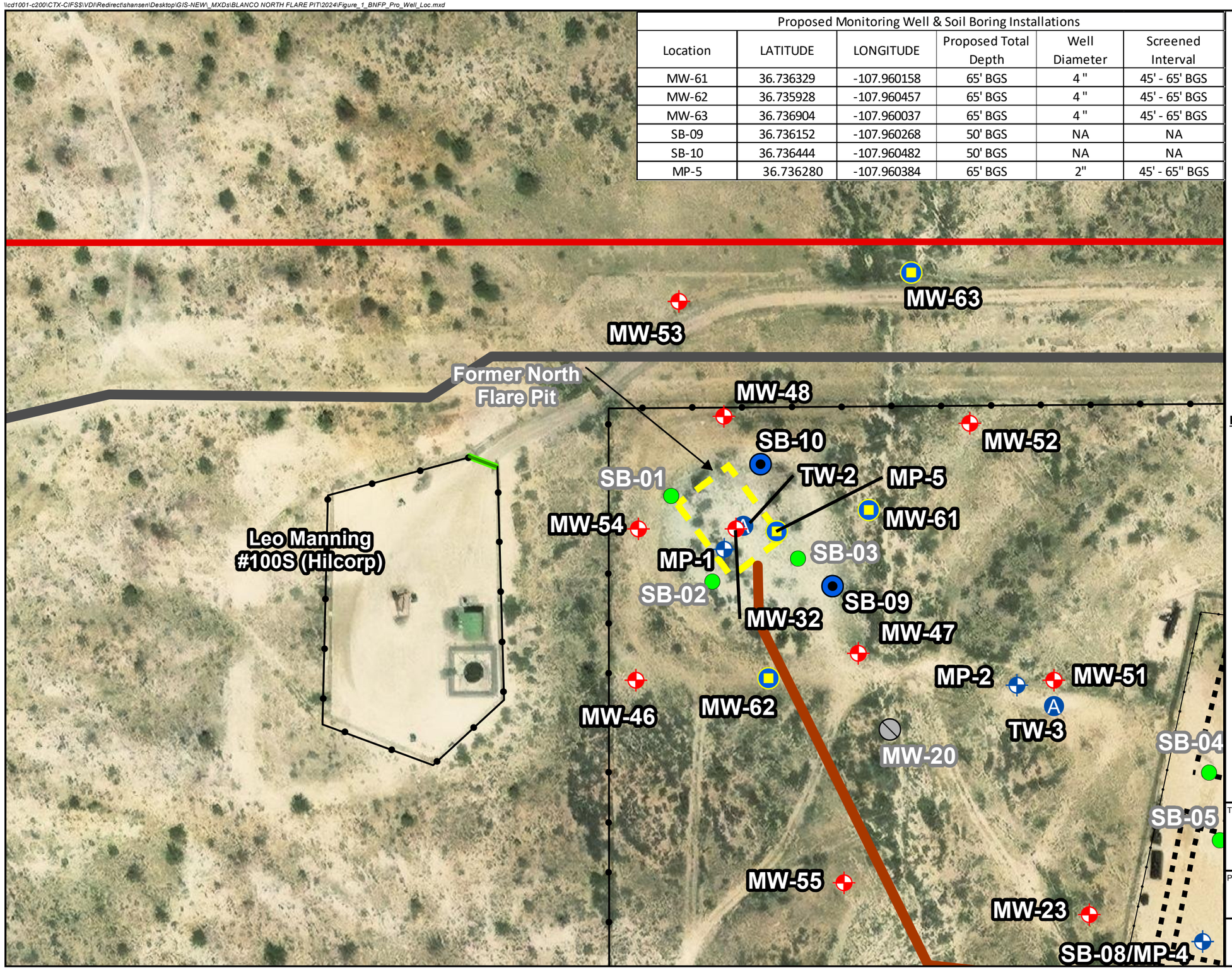
Proposed Monitoring Well & Soil Boring Installations					
Location	LATITUDE	LONGITUDE	Proposed Total Depth	Well Diameter	Screened Interval
MW-61	36.736329	-107.960158	65' BGS	4 "	45' - 65' BGS
MW-62	36.735928	-107.960457	65' BGS	4 "	45' - 65' BGS
MW-63	36.736904	-107.960037	65' BGS	4 "	45' - 65' BGS
SB-09	36.736152	-107.960268	50' BGS	NA	NA
SB-10	36.736444	-107.960482	50' BGS	NA	NA
MP-5	36.736280	-107.960384	65' BGS	2"	45' - 65" BGS



LEGEND

- MONITORING WELL
- TEST WELL
- MONITORING POINT
- ABANDONED/DESTROYED MONITORING WELL
- SOIL BORING
- FENCE
- GATE
- FORMER SITE FEATURES
- FORMER FLARE PIT
- BLM ROW BOUNDARY
- PIPELINE
- DRAINLINE

PROPOSED FEATURES

- MONITORING WELL
- SOIL BORING

N

SCALE IN FEET

0 100

REVISION	DATE	DESIGN BY	DRAWN BY	REVIEWED BY
	2024-06-12	SAH	SAH	SRV

TITLE:

PROPOSED WELL LOCATION

PROJECT:

BLANCO PLANT - NORTH FLARE PIT
BLOOMFIELD, NEW MEXICO

Stantec

Figure No.: 1

APPENDIX A

MICHELLE LUJAN GRISHAM
GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY

March 25, 2024

Noel Shenoi
Principal Environmental Engineer
CALClean, Inc.
1790 N. Case Street
Orange, CA 92865

Air Quality No Permit Required (NPR)
No. 10234
Agency Interest No. 39716 - PRN20240001
CalClean SVE systems
AIRS No. 357771665

Dear Mr. Shenoi:

This letter acknowledges the receipt of your request for a permit applicability determination dated March 19 2024 for an Oil & Gas facility in New Mexico. The request was received by the Department on March 19, 2024.

Operation of numerous identical truck-mounted soil vapor extraction (SVE) systems, used for remediation at gas station sites and other sites with petroleum hydrocarbons, such as oil field sites, pipeline sites, may commence State-Wide (excluding Bernalillo County unless additional approval received), as represented in the request.

The Department has not conducted a review of the information or verified any emission calculations or regulatory analysis. It is the responsibility of the owner and/or operator of the facility to determine applicability and to comply with all existing, revised, and new applicable regulations. This includes requirements to apply for a 20.2.72 NMAC - Construction Permits or 2.73 - Notice of Intent and Emissions Inventory Requirements. The owner and/or operator of the facility is advised to keep records of the emission calculations and regulatory applicability.

As there are emission sources remaining at the site the department will change the status from a Notice of Intent to a No Permit Required. Please be advised that changing the status of the facility is based on the company's determination the site no longer requires a Notice of Intent due to changes in production or equipment and that the AQB has not reviewed the emissions from the remaining sources.

This facility may be subject to state and federal regulations ***such as*** those found in Table 1.

Table 1: Other Regulations

Citation	**Title**
20.2.38 NMAC	Hydrocarbon Storage Facilities
20.2.50 NMAC	Oil and Gas Sector: Ozone Precursor Pollutants
20.2.61 NMAC	Smoke and Visible Emissions
20.2.70 NMAC	Operating Permits
40 CFR 60 Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984

APPENDIX B

Citation	Title
40 CFR 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) For Which Construction, Reconstruction, or Modification Commenced After July 23, 1984
40 CFR 60, Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 CFR 60, Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
40 CFR 60, Subpart OOOOa	Standards of Performance for Crude Oil and Natural Gas Production Transmission and Distribution
40 CFR 63 Subpart HH	National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities
40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines

Please be advised that this No Permit Required determination was based upon the application submitted and these sources, when constructed, will be subject to inspection.

If you have any questions, please do not hesitate to contact me at 505-629-2718 or Joseph.Kimbrell@env.nm.gov.

Sincerely,

Joseph Kimbrell
Technical Services Manager
Permits Section
Air Quality Bureau

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1625 N. French Dr., Hobbs, NM 88240
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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 360285

CONDITIONS

Operator: El Paso Natural Gas Company, L.L.C 1001 Louisiana Street Houston, TX 77002	OGRID: 7046
	Action Number: 360285
	Action Type: [UF-GWA] Ground Water Abatement (GROUND WATER ABATEMENT)

CONDITIONS

Created By	Condition	Condition Date
michael.buchanan	Monitoring Well and Soil Boring Installation and SVE Testing Activities Work Plan to commence on 08/21/204 and concluded on 08/23/2024. Sufficient notice was proved by Santec on behalf of El Paso CGP Company: work plan is satisfactory. 1. Please update permits obtained from the OSE office and submit through the online portal for the file record. 2. Include soil analytics for soil borings in the 2024 annual report. 3. Include well boring logs in the results section of the next annual report submission, along with PID readings, lithologic descriptions, and well construction details. 4. Include TO-15 and TO-3 air sample data in the next SVE report/or GW report	9/18/2024