



HOBBS OCD

July 1, 2012

JUL 03 2012

Mr. Geoffrey Leking
NMOCD District 1
1625 N. French Drive
Hobbs, NM 88240

RECEIVED

AMARILLO
921 North Bivins
Amarillo, Texas 79107
Phone 806.467.0607
Fax 806.467.0622

ARTESIA
408 West Texas Ave.
Artesia, New Mexico 88210
Phone 575.746.8768
Fax 575.746.8905

AUSTIN
911 West Anderson Lane
Suite 202
Austin, Texas 78757
Phone 512.989.3428
Fax 512.989.3487

HOBBS
318 East Taylor Street
Hobbs, New Mexico 88240
Phone 575.393.4261
Fax 575.393.4658

MIDLAND
2901 State Hwy 349
Midland, Texas 79706
Phone 432.522.2133
Fax 432.522.2180

SAN ANTONIO
11 Commercial Place
Schertz, Texas 78154
Phone 210.265.8025
Fax 210.568.2191

TULSA
525 South Main Street
Suite 535
Tulsa, Oklahoma 74103
Phone 918.742.0871
Fax 918.382.0232

Subject: Soil Assessment and Remediation Work Plan
Devon Energy
Uncle Sam 13 Federal No. 1
API # 30-025-30732

Dear Mr. Leking,

Devon Energy has contracted Talon/LPE (Talon) to perform soil sampling and remediation services at the referenced Uncle Sam Federal No. 1 release. Our soil sampling results and proposed remediation activities consist of the following:

Incident Date

May 28, 2012

Background Information

The Uncle Sam 13 Federal No. 1 is located approximately forty-five (45) miles east of Artesia, New Mexico. The legal location for the site is Section 13, Township 18 South and Range 32 East in Lea County, New Mexico. More specifically, the latitude and longitude for the release are 32.751905 North and - 103.717712 West. B CW@130'

According to the soil survey provided by the United States Department of Agriculture National Resources Conservation Services, the soil in this area is made up of Kermit-P Palomas fine sands with 0 to 12 percent slopes. The local surface and shallow geology is Quaternary in age and is comprised of eolian sands and piedmont deposits which include silty soils under lain with hard caliche. The USGS Water Data web site indicates the nearest ground water data to be in S22-T18S-R32E. The ground water in Section 22 is reported to be at depth of 429.49' below ground surface (bgs). The referenced groundwater data is presented in Appendix I.

The ranking for this site is 0 based on the as following:

- Depth to ground water >100'
- Wellhead Protection Area >1000'
- Distance to surface water body >1000'

ENVIRONMENTAL CONSULTING
ENGINEERING
DRILLING
CONSTRUCTION
SPILL MANAGEMENT
GENERAL CONTRACTING

IRP-4334
PKJ 1618738611

Reviewed & commented
Jeff Leking
Env. Specialist
NMOCD-DIST 1
7/6/12

Toll Free: 866.742.0742
www.talonlpe.com



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The ranking for this site is 0 based on the as following:

- Depth to ground water >100'
- Wellhead Protection Area >1000'
- Distance to surface water body >1000'

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GENERAL CONTRACTING

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www.talonlpe.com

THIS WAS
ALREADY DONE

- NEEDS GW DEPTH
AND RANKING
REVISED TO < 50'

- EXCAVATE TO 3
AND TAKE CONF
SAMPLE

OR - EXCAVATE TO
4' NO CONF SAMPLE

Incident Description

On May 28, 2012 corrosion on the piping of the heater treater lead to a release of 50 barrels of produced water and 5 barrels of oil to be released. All fluids were contained within the bermed area of the heater treater. A vacuum truck was immediately brought to the location and recovered 5 barrels of oil and 10 barrels of produced water. The heater treater was repaired.

Actions Taken

On June 8, 2012 Talon/LPE mobilized personnel to begin the site assessment and soil sampling activities for the construction of a work plan. Grab soil samples were collected utilizing a hand auger to a depth of 4-feet below ground surface. Soil sample locations are illustrated on the attached site plan.

All soil samples were collected by Talon personnel wearing clean nitrile gloves. The soil samples were placed in laboratory provided sample containers, iced and transported to Cardinal Laboratories in Hobbs, New Mexico for analysis. The samples were tested for TPH (Total Petroleum Hydrocarbons) using EPA Method 8015M, and volatile organics (BTEX) using EPA Method 8021B. The chlorides were analyzed per SM4500CL-B. The complete laboratory reports are attached as Appendix II.

Analytical Results

Analytical results received from Cardinal Laboratories are summarized below:

June 14, 2012

<u>Sample</u>	<u>Depth</u>	<u>BTEX</u>	<u>Chlorides</u>	<u>TPH (mg/kg)</u>
S-1, Berm Area	0'	191.5	1,550	47,820
	1'	1.968	384	3,570
	2'	0.072	96	5,000
	4'	<0.150	96	16

For this site's ranking, New Mexico Oil Conservation District action level criterion for BTEX is 50 mg/kg, Benzene is 10 mg/kg and TPH is 5,000 mg/kg.

Summary and Conclusions

- Ground water in the project vicinity is approximately 429-feet below land surface per data obtained from the USGS Water Data web site.
- Based upon the results of the laboratory data obtained for this investigation, the vertical impacts of the hydrocarbon release have been documented to extend 2-3 feet below ground surface.

Proposed Remedial Actions

- The impacted area within the berm of the heater treater will be excavated to a depth of 2.5-feet deep and transported to a NMOCD approved solid waste disposal facility.
- Confirmation soil samples will be collected upon completion of the excavation activities. The soil samples will be submitted to the laboratory for TPH analysis using Method 8015M, and BTEX analysis using Method 8021B.
- Upon NMOCD approval of the confirmation samples, the excavated area will be backfilled to grade using new material transported from a local borrow pit. The area will be contoured to match the existing location.
- A final report documenting all field activities and lab reports will be provided to the NMOCD Hobbs Office utilizing Form C-141.

Should you have any questions or if further information is required, please do not hesitate to contact our office at 575.746.8768.

Respectfully submitted,

TALON/LPE

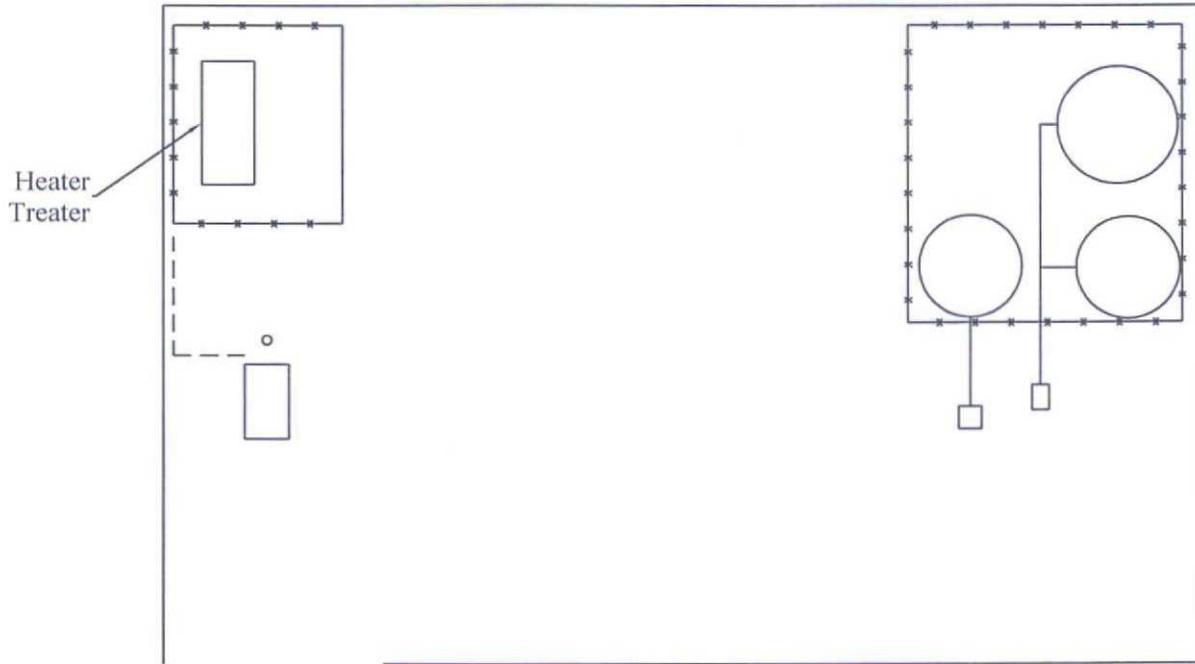


Mike Stubblefield
Project Manager



David J. Adkins
District Manager

SITE MAP



Date: 06/19/2012

Scale: 1" = 40'

Drawn By: TJS

Uncle Sam 13 Federal No. 1
Devon Energy Corporation
Maljamar, New Mexico
Figure 1 - Site Plan

APPENDIX I
GROUNDWATER DATA
INITIAL C-141

Kimberly M. Wilson

From: Michael Stubblefield
Sent: Thursday, June 21, 2012 7:59 AM
To: Kimberly M. Wilson
Subject: Work plan for the Devon Energy Corp. Uncle Sam 13 Federal No.1

UL	SEC	TWN	RNG	SPOT	COUNTY	SOURCE	USGS SITE NUM.	QTY	SITE LOCATION	DATE	LEVEL
04	18S	32E	144		LEA	SEO	1	18S.32E.04.144			65.00
07	18S	32E	44		LEA	SEO	1	18S.32E.07.44			460.00
07	18S	32E	44233		LEA	SEO	1	18S.32E.07.44233		1996-01-30	82.35
16	18S	32E	223433		LEA	SEO	1	18S.32E.16.223433		1991-10-17	84.59
16	18S	32E	22433		LEA	SEO	1	18S.32E.16.22433		1968-03-18	84.18
20	18S	32E	14411		LEA	SEO	1	18S.32E.20.14411		1991-05-14	164.34
22	18S	32E	32322		LEA	SEO	1	18S.32E.22.32322		1986-03-25	429.49
34	18S	32E	22200		LEA	SEO	1	18S.32E.34.22200		1981-03-12	117.28

Kimberly,

Please change the depth to water and site ranking for the Devon Energy Uncle Sam 13 Federal No.1 with the attached water information.

Mike Stubblefield
Project Manager
Talon/LPE
408 West Texas Avenue

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised March 17, 1999

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company Devon Energy	Contact Merle Lewis
Address P. O. Box 250 Artesia, NM 88211	Telephone No. 575-748-6304
Facility Name Uncle Sam 13 Federal 1	Facility Type Oil Well

Surface Owner	Mineral Owner	Lease No.
---------------	---------------	-----------

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
B	13	18S	32E	990	North	1980	East	Lea

NATURE OF RELEASE

Type of Release 50 bbls Produced Water / 5 bbls of Oil	Volume of Release 55 bbls	Volume Recovered 5 oil / 10 Produced Water
Source of Release Corrosion spot on Nipple	Date and Hour of Occurrence 5/28/12, 11:45AM	Date and Hour of Discovery 5/28/12, 11:45AM
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? BLM/ Marlain Eaton & OCD / Eli Gonzales	
By Whom? Merle Lewis	Date and Hour 5/28/12, BLM / 4:15PM, OCD/ 4:20PM	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*
N/A

Describe Cause of Problem and Remedial Action Taken.*
At the Uncle Sam 13 Fed 1 battery, a nipple on a water dump developed a leak, resulting in a spill of 50bbls of produced water and 5bbl spill of oil.

Describe Area Affected and Cleanup Action Taken.*
It was discovered that there was a corrosion spot on the nipple, were the leak developed. All fluid was contained within the heater treater berm. A vacuum truck was able to recover 5 barrels of oil and 10 barrels of produced water. Talon will complete clean-up plan.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: <i>Gracie Bustamante</i>	OIL CONSERVATION DIVISION	
Printed Name: Gracie Bustamante	Approved by District Supervisor:	
Title: Field Adm. Support	Approval Date:	Expiration Date:
Date: 5/30/12 Phone: (575) 746-5561	Conditions of Approval:	Attached <input type="checkbox"/>

* Attach Additional Sheets If Necessary



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

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

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

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

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD Number	POD Code	Subbasin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	Depth Well	Depth Water	Water Column
L 03454	L	LE		2	2	30	18S	33E		622200	3621422*	3744	100	35	65
													Average Depth to Water:		35 feet
													Minimum Depth:		35 feet
													Maximum Depth:		35 feet

Record Count: 1

UTMNAD83 Radius Search (in meters):

Easting (X): 620425

Northing (Y): 3624719

Radius: 4000

*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

APPENDIX II
LABORATORY RESULTS

June 14, 2012

MIKE STUBBLEFIELD
TALON LPE
408 W. TEXAS AVE.
ARTESIA, NM 88210

RE: UNCLE SAM 13 FED. NO. 1

Enclosed are the results of analyses for samples received by the laboratory on 06/08/12 13:34.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Celey D. Keene
Lab Director/Quality Manager

Analytical Results For:

 TALON LPE
 MIKE STUBBLEFIELD
 408 W. TEXAS AVE.
 ARTESIA NM, 88210
 Fax To: (575) 745-8905

Received:	06/08/2012	Sampling Date:	06/08/2012
Reported:	06/14/2012	Sampling Type:	Soil
Project Name:	UNCLE SAM 13 FED. NO. 1	Sampling Condition:	Cool & Intact
Project Number:	700794.029.01	Sample Received By:	Jodi Henson
Project Location:	SEC.13 - T19S - R32E		

Sample ID: S-1 0' BERMED AREA (H201298-01)

BTEX 8021B		mg/kg		Analyzed By: ZZZ				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	3.30	0.500	06/13/2012	ND	2.10	105	2.00	4.88	
Toluene*	36.7	0.500	06/13/2012	ND	2.17	109	2.00	2.07	
Ethylbenzene*	50.5	0.500	06/13/2012	ND	2.21	111	2.00	1.77	
Total Xylenes*	101	1.50	06/13/2012	ND	6.86	114	6.00	0.457	

Surrogate: 4-Bromofluorobenzene (PIE) 185 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP				S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1550	16.0	06/12/2012	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS				S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	6420	200	06/12/2012	ND	176	88.0	200	4.28	
DRO >C10-C28	41400	200	06/12/2012	ND	172	86.2	200	7.49	

Surrogate: 1-Chlorooctane 562 % 65.2-140

Surrogate: 1-Chlorooctadecane 1970 % 63.6-154

Cardinal Laboratories

*—Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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 TALON LPE
 MIKE STUBBLEFIELD
 408 W. TEXAS AVE.
 ARTESIA NM, 88210
 Fax To: (575) 745-8905

Received:	06/08/2012	Sampling Date:	06/08/2012
Reported:	06/14/2012	Sampling Type:	Soil
Project Name:	UNCLE SAM 13 FED. NO. 1	Sampling Condition:	Cool & Intact
Project Number:	700794.029.01	Sample Received By:	Jodi Henson
Project Location:	SEC.13 - T19S - R32E		

Sample ID: S-1 1' (H201298-02)

BTEX 8021B		mg/kg		Analyzed By: ZZZ					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	0.075	0.050	06/13/2012	ND	2.10	105	2.00	4.88	
Toluene*	0.933	0.050	06/13/2012	ND	2.17	109	2.00	2.07	
Ethylbenzene*	0.379	0.050	06/13/2012	ND	2.21	111	2.00	1.77	
Total Xylenes*	0.581	0.150	06/13/2012	ND	6.86	114	6.00	0.457	

Surrogate: 4-Bromofluorobenzene (PIE) 123 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	384	16.0	06/12/2012	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS						S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<50.0	50.0	06/12/2012	ND	176	88.0	200	4.28		
DRO >C10-C28	3570	50.0	06/12/2012	ND	172	86.2	200	7.49		

Surrogate: 1-Chlorooctane 95.0 % 65.2-140

Surrogate: 1-Chlorooctadecane 178 % 63.6-154

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* = Accredited Analyte

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 MIKE STUBBLEFIELD
 408 W. TEXAS AVE.
 ARTESIA NM, 88210
 Fax To: (575) 745-8905

 Received: 06/08/2012
 Reported: 06/14/2012
 Project Name: UNCLE SAM 13 FED. NO. 1
 Project Number: 700794.029.01
 Project Location: SEC.13 - T19S - R32E

 Sampling Date: 06/08/2012
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: S-1 2' (H201298-03)

BTEX 8021B		mg/kg		Analyzed By: ZZZ					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/14/2012	ND	1.91	95.5	2.00	2.76	
Toluene*	0.072	0.050	06/14/2012	ND	1.93	96.3	2.00	3.98	
Ethylbenzene*	<0.050	0.050	06/14/2012	ND	1.97	98.4	2.00	4.72	
Total Xylenes*	<0.150	0.150	06/14/2012	ND	5.99	99.8	6.00	6.57	

Surrogate: 4-Bromofluorobenzene (PIE) 102 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	06/12/2012	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS						S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<100	100	06/12/2012	ND	176	88.0	200	4.28		
DRO >C10-C28	5000	100	06/12/2012	ND	172	86.2	200	7.49		

Surrogate: 1-Chlorooctane 86.4 % 65.2-140

Surrogate: 1-Chlorooctadecane 242 % 63.6-154

Cardinal Laboratories

* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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 TALON LPE
 MIKE STUBBLEFIELD
 408 W. TEXAS AVE.
 ARTESIA NM, 88210
 Fax To: (575) 745-8905

Received:	06/08/2012	Sampling Date:	06/08/2012
Reported:	06/14/2012	Sampling Type:	Soil
Project Name:	UNCLE SAM 13 FED. NO. 1	Sampling Condition:	Cool & Intact
Project Number:	700794.029.01	Sample Received By:	Jodi Henson
Project Location:	SEC.13 - T19S - R32E		

Sample ID: S-1 3' (H201298-04)

BTEX 8021B		mg/kg		Analyzed By: ZZZ					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/14/2012	ND	1.91	95.5	2.00	2.76	
Toluene*	<0.050	0.050	06/14/2012	ND	1.93	96.3	2.00	3.98	
Ethylbenzene*	<0.050	0.050	06/14/2012	ND	1.97	98.4	2.00	4.72	
Total Xylenes*	<0.150	0.150	06/14/2012	ND	5.99	99.8	6.00	6.57	

Surrogate: 4-Bromofluorobenzene (PIC) 102 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	06/12/2012	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	06/12/2012	ND	176	88.0	200	4.28	
DRO >C10-C28	16.0	10.0	06/12/2012	ND	172	86.2	200	7.49	

Surrogate: 1-Chlorooctane 91.5 % 65.2-140

Surrogate: 1-Chlorooctadecane 111 % 63.6-154

Cardinal Laboratories

* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

 TALON LPE
 MIKE STUBBLEFIELD
 408 W. TEXAS AVE.
 ARTESIA NM, 88210
 Fax To: (575) 745-8905

Received:	06/08/2012	Sampling Date:	06/08/2012
Reported:	06/14/2012	Sampling Type:	Soil
Project Name:	UNCLE SAM 13 FED. NO. 1	Sampling Condition:	Cool & Intact
Project Number:	700794.029.01	Sample Received By:	Jodi Henson
Project Location:	SEC.13 - T19S - R32E		

Sample ID: S-1 4' (H201298-05)

BTEX 8021B		mg/kg		Analyzed By: ZZZ					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/14/2012	ND	1.91	95.5	2.00	2.76	
Toluene*	<0.050	0.050	06/14/2012	ND	1.93	96.3	2.00	3.98	
Ethylbenzene*	<0.050	0.050	06/14/2012	ND	1.97	98.4	2.00	4.72	
Total Xylenes*	<0.150	0.150	06/14/2012	ND	5.99	99.8	6.00	6.57	

Surrogate: 4-Bromofluorobenzene (PIE) 104 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	06/12/2012	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	06/12/2012	ND	176	88.0	200	4.28	
DRO >C10-C28	76.7	10.0	06/12/2012	ND	172	86.2	200	7.49	

Surrogate: 1-Chlorooctane 93.5 % 65.2-140

Surrogate: 1-Chlorooctadecane 112 % 63.6-154

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Notes and Definitions

- S-06 The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
- S-04 The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- ** Samples not received at proper temperature of 6°C or below.
- *** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report

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