

2R - 30

REPORTS

DATE:

June 25, 1993



RITTER ENVIRONMENTAL & GEOTECHNICAL SERVICES

119 N. Colorado, Suite 201, Midland, Texas 79701
Bus: (915) 682-7404 • Metro: (915) 570-6007 • Fax: (915) 682-7440

FINAL CLOSURE REPORT

UNLINED SURFACE IMPOUNDMENT CLOSURE

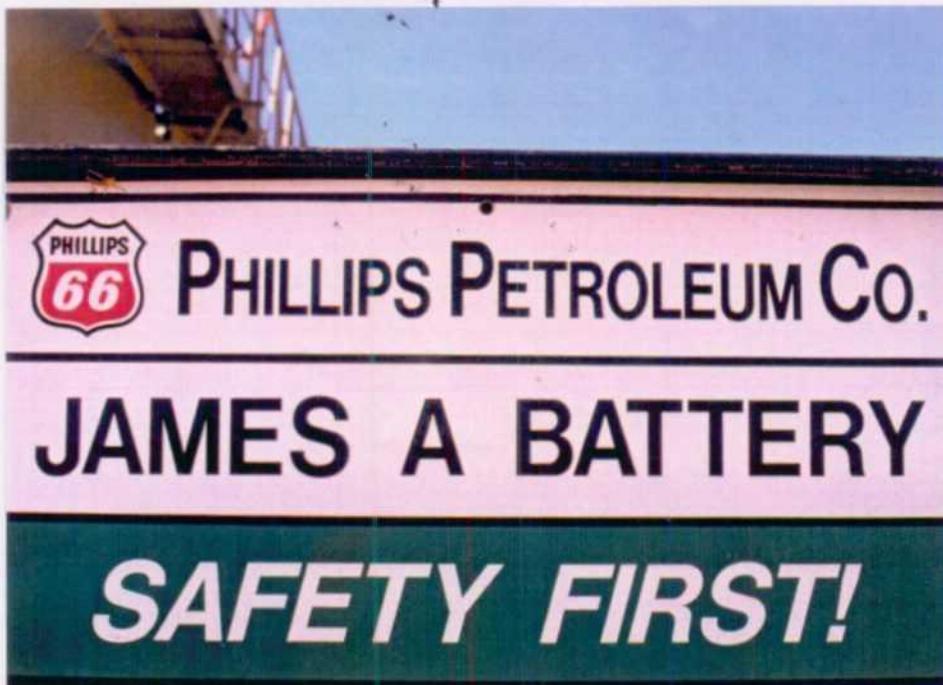
PHILLIPS PETROLEUM COMPANY

**JAMES A LEASE
NW SE OF SECTION 2
TOWNSHIP 22 SOUTH, RANGE 30 EAST
EDDY COUNTY, NEW MEXICO**

RECEIVED

JAN 24 1994

**OIL CONSERVATION DIV.
SANTA FE**



JUNE 25, 1993

PREPARED BY:

**MITCHELL R. RITTER
MANAGING PARTNER
RITTER ENVIRONMENTAL & GEOTECHNICAL SERVICES (REGS)
MIDLAND, TEXAS**

OIL CONSERVATION DIVISION
RECEIVED



'94 JAN 24 AM 10 10

RITTER ENVIRONMENTAL & GEOTECHNICAL SERVICES

2900 N. Big Spring, Midland, Texas 79705

Bus: (915) 682-7404 • Metro: (915) 570-6007 • Fax: (915) 682-7440

January 20, 1994

Mr. William Olson
New Mexico EM & NRO
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504

Re: Phillips Petroleum Company, Surface Impoundment Closures
Eddy & Lea Counties, New Mexico

Dear Bill:

We have completed the closure of several surface impoundments located in Lea and Eddy Counties on behalf of Phillips Petroleum Company. Mr. Jeff Carlson with Phillips has asked that I forward a formal copy of the final reports to your office.

REGS and Phillips are pleased with the results of our efforts and trust that you will agree. Your comments are welcome.

If you have any questions, please do not hesitate to call me at your convenience. I will place a follow-up call to make sure you have received the reports.

Sincerely,

Mitchell Ritter

MRR/amc
Enclosure

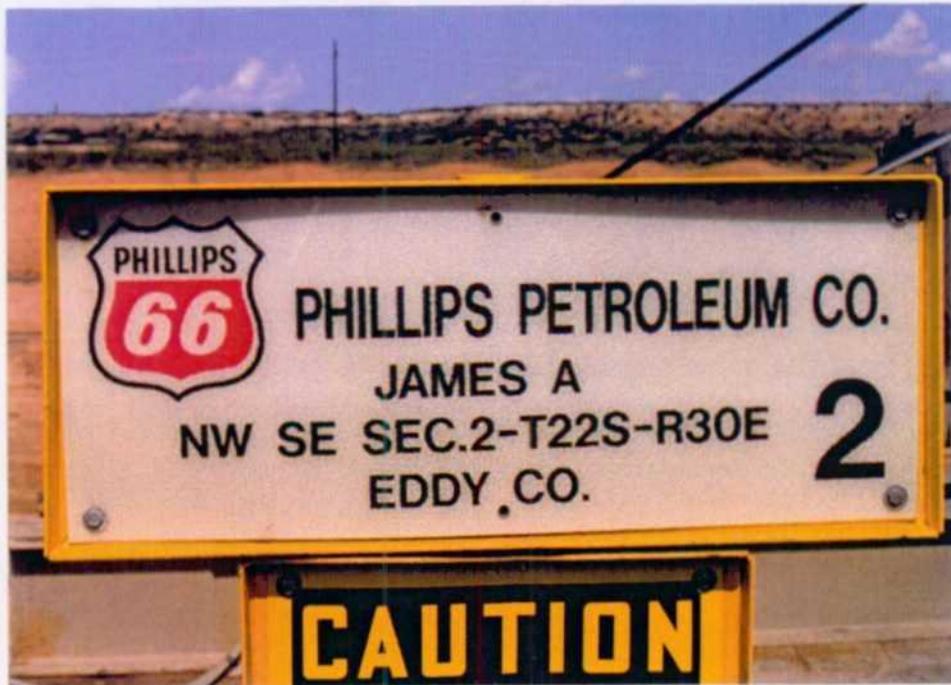


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I. INTRODUCTION & BACKGROUND

Ritter Environmental & Geotechnical Services (REGS) was contracted by Phillips Petroleum Company to properly address the closure of an unlined earthen surface impoundment located on a Phillips Petroleum lease in Eddy County, New Mexico. The impoundment is located in the northwest quarter of the southern quarter of Section 2, Township 22 South, Range 30 East.

The surface impoundment had been in place for approximately five (5) years and has been receiving produced water and small amounts of crude oil during this time. At the time the pit was decommissioned, surface hydrocarbon staining of the impoundment walls and floor were present and visible. The degree of contamination was measured in a preliminary soil sample taken prior to the remedial actions. The TPH level of this sample was measured at 138,000 ppm. Preliminary soil investigation indicated gross soil contamination did not exceed past three to four foot in depth below the surface of the impoundment. Several test areas were dug by hand to make this determination. The impoundment covers an area of approximately 300 feet by 200 feet. (Please refer to Appendix at the end of this report for map reference)

II. SCOPE OF WORK

The scope of work consisted of the necessary operations to remediate the hydrocarbons and salt affected soil by encapsulation through solidification. Visual and olfactory methods were utilized to delineate the grossly contaminated soils.

The operations began by scraping the interior sloped walls of the impoundment into the level impoundment area. The floor of the impoundment was then mechanically scraped and pushed (crowded) to the east side of the interior of the impoundment. The impoundment was dewatered at the time of the remedial action. It was noted that discolored soil was found in spotty patches to a depth of approximately four (4) feet.

Heavy staining was particularly noted to be associated with the area surrounding the inlet piping that supplies the produced water to the impoundment. The floors and walls were scraped until no visibly affected or odorous soils remained. The affected soils were piled along the east wall in preparation for treatment. An elevated berm was built near the east center of the impoundment floor to assist in the treatment process. Cementitious materials were then thoroughly mixed with the affected soils while adding fresh water. Areas of approximately 30' X 20 feet were mechanically mixed and subsequently allowed to harden and cure. Core sampling of each day's mixing was performed prior to hardening. Proper sample techniques and protocol were utilized in the acquisition, handling and transport of all samples. Analytical results are presented in the following section of this report. After all affected soils were thoroughly mixed and solidified, a smooth finish was placed on the mixture. After allowing approximately 120 hours (5 days) of curing time, the remaining impoundment walls were utilized to cover the solidified materials and bring the impoundment back to grade. The area of solidified soil was bermed one to two feet above the surrounding terrain to prevent rain water pooling and run-on from up gradient rain water.

III. ANALYTICAL

Analyses of the solidified soil core sampling were conducted on six (6) separate samples. The samples were taken on a daily basis as to represent a typical cross section of that particular day's work. Samples were collected with a clean core sampling device and immediately placed in clean glass sample containers and sealed with a teflon lined septum. After collection, each sample was placed on ice and chilled to approximately 4° C until delivered to the laboratory for analyses. The following table represents the analytical results:

TCLP Analyses

SAMPLE #	TPH mg/kg	TOTAL BTEX mg/l	BENZENE mg/l	TOLUENE mg/l	ETHYL BENZENE mg/l	XYLENES mg/l
61093-1J	118	0.019	<0.004	0.019	<0.004	<0.004
61193-2J	31	0.181	0.011	0.017	<0.004	<0.004
61293-3J	34	0.037	0.008	0.029	<0.004	<0.004
61393-4J	443	0.162	<0.004	0.10	<0.004	<0.004
61493-5J	234	0.025	0.005	0.02	<0.004	<0.004
61593-6J	232	0.184	0.014	0.13	0.007	0.033

Proper chain of custody documentation is provided in the appendix of this report. Subsequent to TPH and BTEX analyses, a seven day lechate test was performed on each of the six daily samples. The seven day lechate test simulates actual undisturbed subsurface conditions and allows the sample to remain in an partially water filled glass container for a period of seven days. The liquid lechate is then measured for any TPH or BTEX constituents. The results of the seven day lechate test are as follows:

Seven Day Lechate Test

SAMPLE #	TPH mg/l	TOTAL BTEX mg/l	BENZENE mg/l	TOLUENE mg/l	ETHYL BENZENE mg/l	XYLENES mg/l
61093-1J	1.14	<0.004	<0.004	<0.004	<0.004	<0.004
61193-2J	0.61	<0.004	<0.004	<0.004	<0.004	<0.004
61293-3J	0.52	<0.004	<0.004	<0.004	<0.004	<0.004
61393-4J	1.12	<0.004	<0.004	<0.004	<0.004	<0.004
61493-5J	1.69	<0.004	<0.004	<0.004	<0.004	<0.004
61593-6J	1.13	<0.004	<0.004	<0.004	<0.004	<0.004

All analytical methodology used in the previous analyses conform to NMOCD and US EPA

standards. QA/QC information is included with the formal laboratory reports in the appendix of this report.

IV. CONCLUSIONS

Solidification refers to a treatment system designed to improve the handling and physical characterization of wastes, to decrease the surface area across which the loss or transfer of waste characteristics can occur, and to limit the solubility of those characteristics.

Review of the core sample analyses strongly supports the use of the encapsulation/solidification process as an environmentally safe and sound technology to control and remediate hydrocarbon affected soils. The encapsulation/solidification process, as applied to the James Pit, effectively limits the leachability of the hydrocarbons previously entrained in the floor and walls of the impoundment and prevents the hydrocarbons from entering subsurface groundwater and soils.

The James surface impoundment has been properly closed in accordance with the NMOCD published guidelines for "Unlined Surface Impoundment Closure" dated February 1993. No further actions are recommended or anticipated at this site.

PHOTOGRAPHS



5/93

JAMES A. PIT

FORMER CONTENT: PRODUCED WATER & CRUDE

1. Prior to treatment, looking NE from SW corner



2. Looking north from SW corner



3. Heaviest concentration of hydrocarbons, NE corner of surface



4. Pushing wall materials into pit area



5. Excavation of heaviest section of sludge to 4 feet deep



6. Unaffected soil below 3-4 feet



7. Unaffected soil below 3-4 feet



8. Crowding pit to east side



9. Crowding pit



10. Crowding pit after pushing in wall material



11. Visual staining



12. Building treatment area



13. Solidified Pit



14. Solidified Pit



15. Reclaiming pit to original grade



16. Covering pit and berming

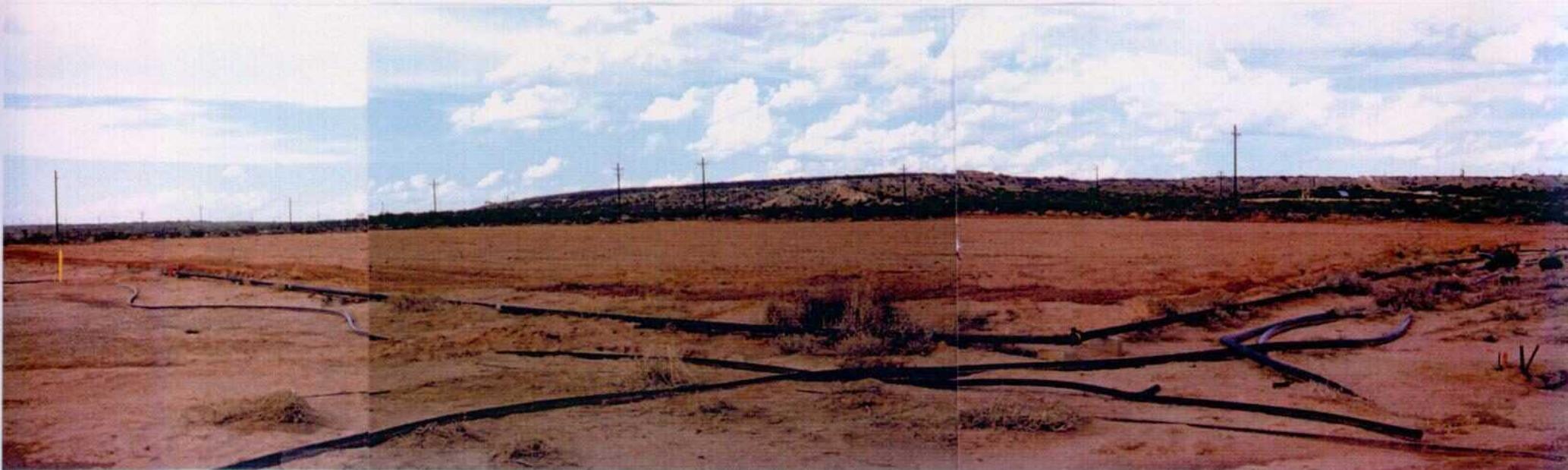


17. Covering pit





SURFACE RECLAMATION

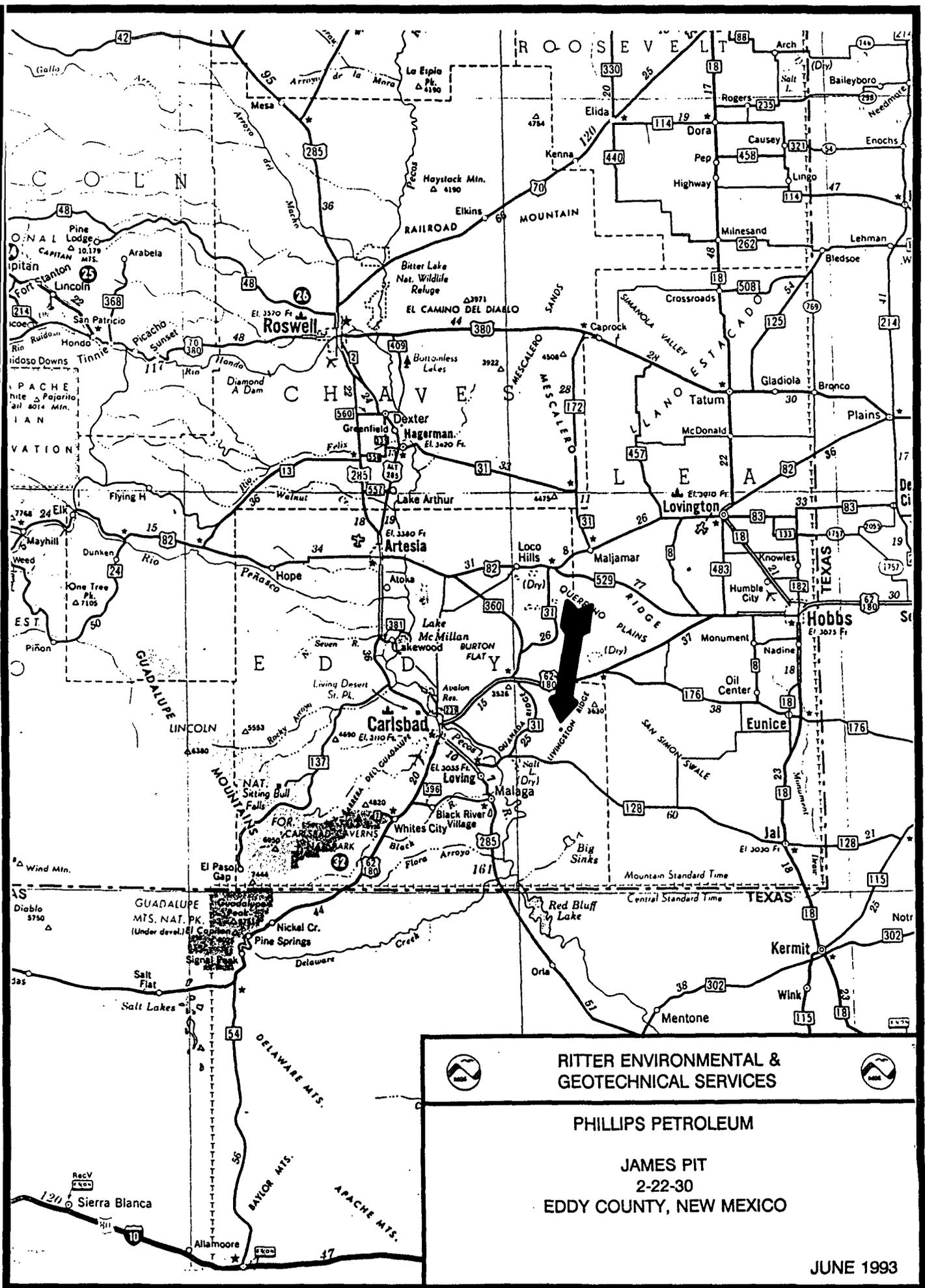


REMEDICATION & RECLAMATION CONCLUDED
START DATE: 6/7/93— FINISH DATE: 6/22/93 (TOTAL: 15 DAYS)



REMEDICATION AND RECLAMATION COMPLETE

MAPS





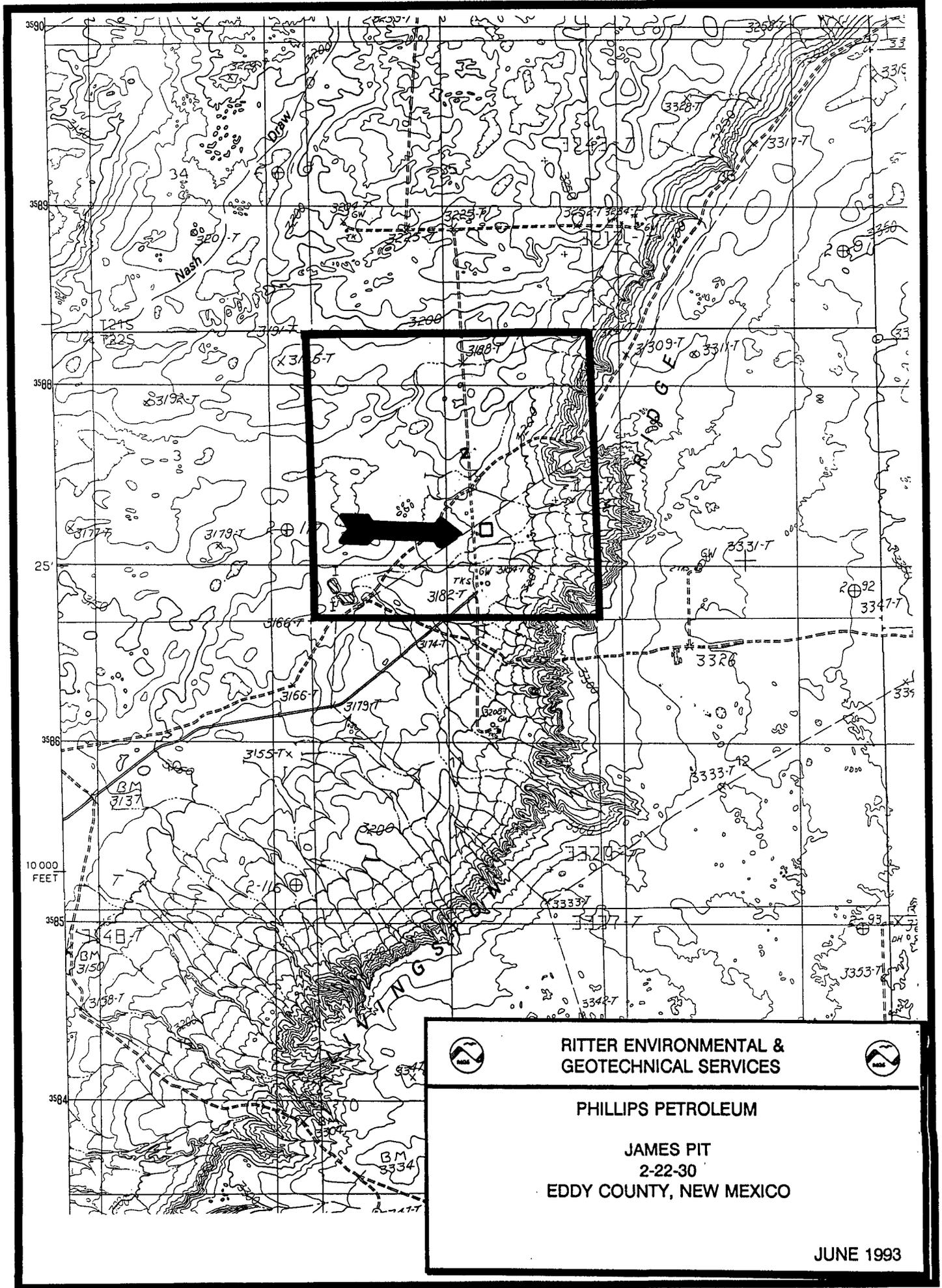
**RITTER ENVIRONMENTAL &
GEOTECHNICAL SERVICES**



PHILLIPS PETROLEUM

JAMES PIT
2-22-30
EDDY COUNTY, NEW MEXICO

JUNE 1993



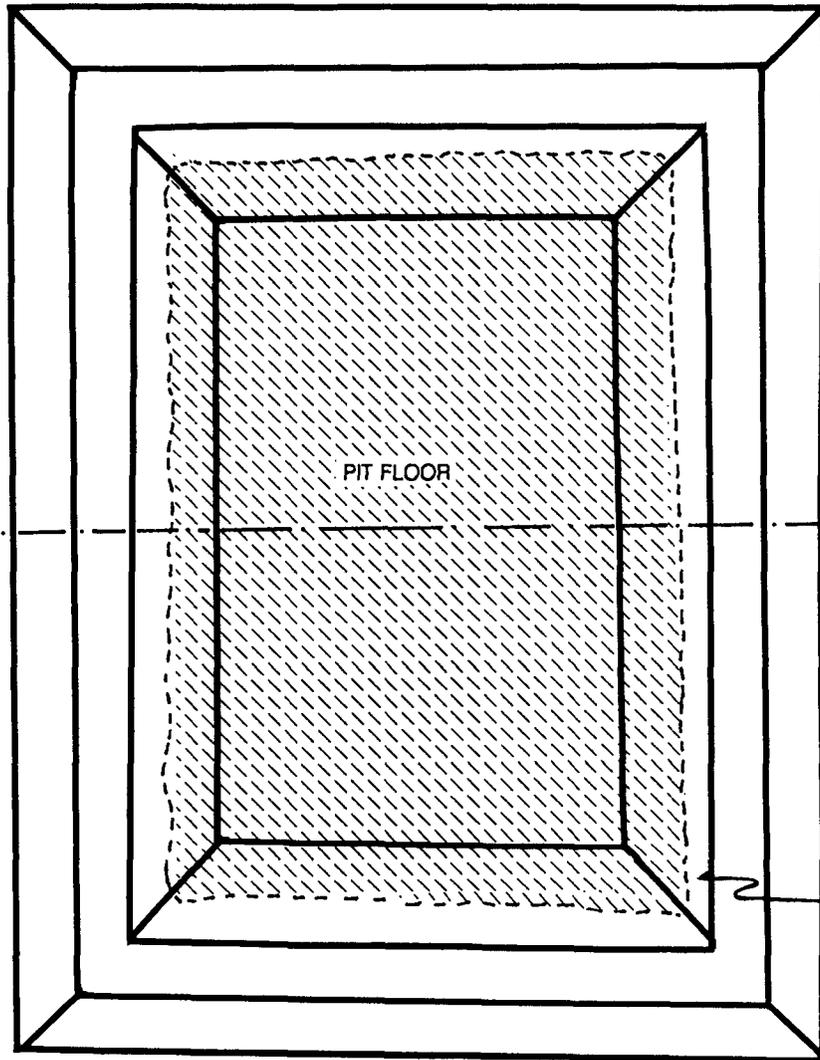
RITTER ENVIRONMENTAL &
GEOTECHNICAL SERVICES



PHILLIPS PETROLEUM

JAMES PIT
2-22-30
EDDY COUNTY, NEW MEXICO

JUNE 1993

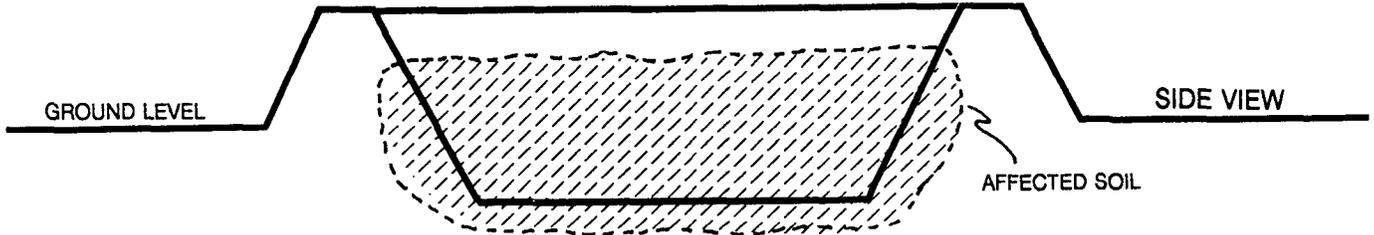


TOP VIEW

PIT FLOOR

2 CROSS SECTIONAL AREA

AFFECTED SOIL



GROUND LEVEL

SIDE VIEW

AFFECTED SOIL

VERTICAL SCALE EXAGGERATED



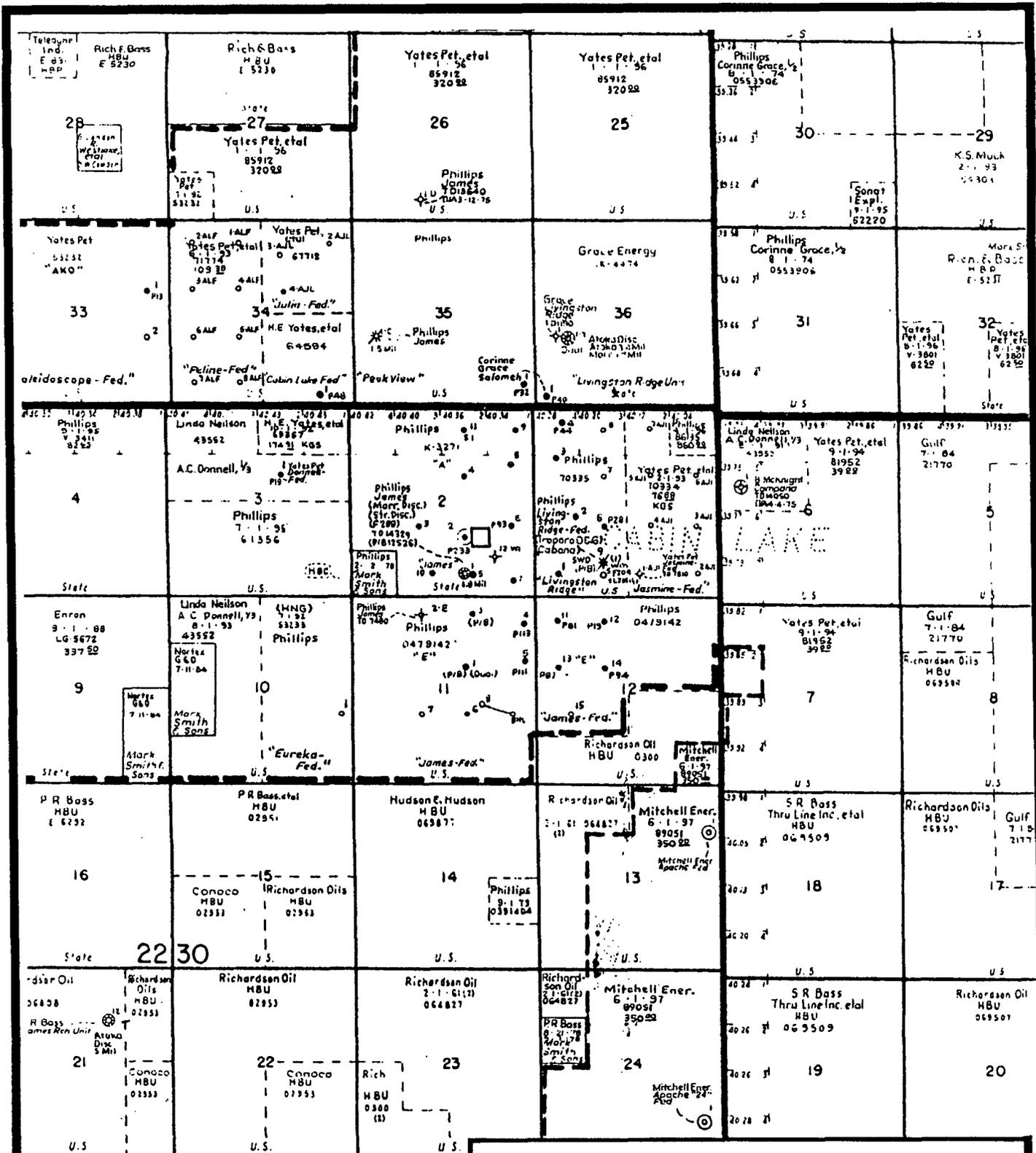
RITTER ENVIRONMENTAL &
GEOTECHNICAL SERVICES



PHILLIPS PETROLEUM
JAMES PIT
2-22-30
EDDY COUNTY, NEW MEXICO

SCALE 1' - 50'

JUNE 1993





RITTER ENVIRONMENTAL & GEOTECHNICAL SERVICES



PHILLIPS PETROLEUM

JAMES PIT
2-22-30
EDDY COUNTY, NEW MEXICO

SCALE 1" = 50'

JUNE 1993

CORRESPONDENCE



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

BRUCE KING
GOVERNOR

OIL CONSERVATION DIVISION
ARTESIA DISTRICT OFFICE

P.O. DRAWER DD
ARTESIA, NEW MEXICO 88211
(505) 748-1283

May 25, 1993

MAY 26 1993

Mr. Jeff Carlson
Phillips Petroleum Company
4001 Penbrook
Odessa, Texas 79762

RE: **Cabin Lake Field Surface Impoundment Closure**
Phillips Petroleum Company
Sec.2, T.22S, R.30E
Eddy County, New Mexico

Dear Mr. Carlson:

The New Mexico Oil Conservation Division (OCD) has completed a reviewed of the May 13, 1993 "SURFACE IMPOUNDMENT CLOSURE-PHILLIPS PETROLEUM COMPANY CABIN LAKE FIELD OF EDDY COUNTY, NEW MEXICO. SECTION, 2 TWP 22 SOUTH RANGE 30 EAST" which was submitted by Ritter Environmental & Geotechnical Services on behalf of Phillips Petroleum Company.

The above mentioned closure plan is hereby approved with the following conditions:

1. Upon completion of the closure activities the pit area will be mounded to prevent ponding.
2. A closure report will be submitted to the OCD within 60 days of the "post treatment core sampling" event.
3. The OCD will be notified at least 72 hours in advance of all closure activities such that the OCD may have the opportunity to witness the activities and/or split samples.

Mr. Jeff Carlson
May 25, 1993
Page 2

Please be advised that OCD approval does not relieve Phillips of liability if closure activities determine that contamination exists which is beyond the scope of the closure plan. In addition, OCD approval does not relieve Phillips of liability for compliance with other federal, state or local laws and/or regulations.

If you have any questions, please do not hesitate to contact me at (505) 748-1283.

Sincerely,



Mark Ashley
District Geologist
Oil Conservation Division

cc: Mitchell Ritter - Ritter Environmental & Geotechnical Services



RITTER ENVIRONMENTAL & GEOTECHNICAL SERVICES

119 N. Colorado, Suite 201, Midland, Texas 79701
Bus: (915) 682-7404 • Metro: (915) 570-6007 • Fax: (915) 682-7440

May 13, 1993

Mr. Mark Ashley
Mr. Mike Williams
New Mexico Oil Conservation Division
P.O. Drawer DD
Artesia, New Mexico 88211

Re: Surface Impoundment Closure - Phillips Petroleum Company
Cabin Lake Field of Eddy County, New Mexico. Section 2, TWP 22 South Range
30 East

Dear Messrs. Ashley and Williams:

I am writing to seek your approval of the closure of an unlined surface impoundment (pit) located at the above referenced facility operated by Phillips Petroleum Company.

In conjunction with Mr. Jeff Carlson, Phillips Petroleum's safety and environmental representative, Ritter Environmental & Geotechnical Services (REGS) would like to present the enclosed proposal and information for your review and approval prior to pit closure.

As this pit is being decommissioned by the operator, Phillips Petroleum Company, it is their desire to adhere to the currently established guidelines for pit (surface impoundment) closure as published by the NMOCD in February 1993 and to address the closure of this pit in a safe and cost effective manner. As an alternative to transporting and landfilling of these wastes (where in only a transfer of the problem occurs) and to long term bioremedial activities that would involve many months and possibly years to accomplish the current remedial guidelines as set forth by the NMOCD, we (REGS) through currently developed solidification techniques propose to treat the waste materials on site by stabilization of the waste through solidification.

We are currently utilizing combinations or separate application of portland cement, kiln dust and/or fly ash to bind the wastes into a hardened monolithic block of concrete type material. Solidification refers to treatment systems which are designed to improve the handling and physical characteristics of such wastes, to decrease the surface area across which the transfer or loss of the waste characteristics can occur, and to limit the solubility of those waste characteristics. This treatment effectively limits the leachate process and prevents the materials from entering the subsurface soils and groundwater. Stabilization

prevents the materials from entering the subsurface soils and groundwater. Stabilization techniques, such as solidification, have benefits primarily in limiting the solubility of the waste or by detoxifying the waste contaminants, even though the physical characteristics of the waste may or may not appear to be changed. It is intended that the following procedures will be followed in the performance of our services:

- I. **Preliminary Site Evaluation** - Includes a visual inspection and sampling of each pit and the surrounding area to determine site specific conditions such as; nearby surface waters, streams, surface soil types and depths, proximity to groundwater supply wells, physical and chemical properties of the contents of each pit and the treatability of those contents.
- II. **Treatment/Solidification** - After careful preparation of the site for safe operations the solidification process begins. Solidification begins with the physical addition of the appropriate product(s) in the correct proportions to the type of waste involved. Mechanical mixing methods are utilized to thoroughly blend the waste material and the appropriate solidifying agent(s) with correct proportions of water. At this time, a curing process is allowed to take place for a period of approximately 48 hours. Post treatment core samples will be taken from each pit to determine TCLP parameters for volatile organic compounds (VOC's) such as Benzene and Total BTEX.
- III. **Site Reclamation** - After treatment, the site will be reclaimed by placing native soils over the treated area and recontouring the site back to the original grade (if possible).

I have included analytical results of one series of bench tests we have performed on actual pit material from the Cabin Lake field. These tests have generated very pleasing results, wherein we have solidified pit sludge and performed TCLP, BTEX, and TPH analyses on the solidified samples. As you can see, in each case the solidified material renders the levels of BTEX and TPH leachability to acceptable levels in accordance with the NMOCD guidelines.

The series of analyses was run and dated 5-3-93. The series labeled J-1, J-2, and J-3 represent the James Pit in the Cabin Lake field. The analytical results of the treated pit sludge are within current NMOCD guidelines.

In reference to analytical tests currently run, we would like to suggest to the NMOCD an alternative to testing the pit material after treatment. We have determined through past

Mr. Mike Williams

May 13, 1993

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experience with the solidification process that the TCLP procedure and methodology currently being used for identification of elevated levels of toxic compounds may not be the most appropriate methods for the analysis of actual site conditions post treatment.

We would suggest the adoption of a seven (7) day leachate test in lieu of the TCLP analysis. The seven (7) day leachate test is a non-violent test in which actual sub surface conditions are simulated by submersing the sample to be tested in deionized water for a period of seven (7) days prior to analyses of the water. This test simulates actual saturated groundwater conditions at the site and relates to leachability as opposed to the violent tumbling action the samples are subjected to in the TCLP methodology. Also, the approximately 20 to 1 dilution factor utilized in the TCLP methodology is not utilized in the seven (7) day leachate method.

We have obtained the following results utilizing the seven (7) day leachate test on the same samples previously run for TCLP:

<u>SAMPLE #</u>	<u>TPH</u> mg/l	<u>BENZENE</u> mg/l	<u>ETHLYBENZENE</u> mg/l	<u>TOLUENE</u> mg/l	<u>XYLENE</u> mg/l
J-3 (JAMES PIT)	2.2	<.004	<.004	<.004	<.004

The methodology for the seven (7) day leachate test is as follows and is a part of the accepted methodology utilized by the Texas Water Commission (TWC) for landfill evaluations:

7-Day Distilled Water Leachate Test

This test is intended only for dry, solid wastes, i.e., waste materials without any free liquids.

1. Place a 250 gm. (dry weight) representative sample of the waste material in a 1500 ml. Erlenmeyer flask.
2. Add 1 liter of deionized or distilled water into the flask and mechanically stir the material at a low speed for five (5) minutes.
3. Stopper the flask and allow to stand for seven (7) days.
4. At the end of the seven (7) days, filter the supernatant solution through a .45 micron filter, collecting the supernatant into a separate flask.
5. subject the filtered leachate to the appropriate analysis.

Mr. Mike Williams
May 13, 1993
Page 4

Although we feel the above methodology is more appropriate, we will provide TCLP analyses should the above methodology not be approved.

I have included photographs of pit solidification performed in Southeast Montana, northeast of Wyoming and southwest of Wyoming. These pits were solidified with appropriate state agency approval.

We have also included copies of two excerpts from the Superfund Innovative Technology Evaluation program (SITE) funded and directed by the EPA to evaluate new technologies. These excerpts, although not identical to our process, are similar and provide some insight into the feasibility of our work.

We are hereby requesting your approval to apply and utilize the above described technology in the treatment of the surface impoundment referenced at the beginning of this correspondence. Your response should be directed to me at the letterhead address.

Thank you for taking the time to review this proposal. Your comments and assistance will be greatly appreciated.

Sincerely,



Mitchell Ritter

MRR/bk

cc: Mr. Bill Olson/NMOCD - Santa Fe, New Mexico

ANALYTICAL



SOUTHWESTERN LABORATORIES

Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services

1703 West Industrial Avenue • P.O. Box 2150 • Midland, Texas 79702

Report of tests on Soil
Client Ritter Environmental & Geotechnical Services
Delivered by Mitch Ritter

File No. 6750100
Report No. 80622
Report Date 05-13-93
Date Received March 1993

Identification Phillips Petroleum Co.

REPORT OF TOTAL PETROLEUM HYDROCARBONS

Date of Analysis 05-12-93
Analyst S. Stovall

Method SW846,3550;EPA 418.1
MDL 5.0 mg/kg

Sample Identification

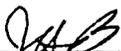
Results, mg/kg

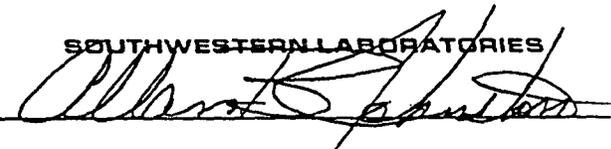
James Pit

138000

*Denotes "less than"

Copies: Ritter Environmental & Geotechnical Services
Attn: Mitch Ritter


Reviewed by

SOUTHWESTERN LABORATORIES




SOUTHWESTERN LABORATORIES

1703 West Industrial Avenue * P.O. Box 2150, Midland, Texas 79702 * 915/683-3349

Client REGS
119 N. Colorado Suite 201
Midland, Tx. 79701

Client No. 6750100
Report No. M3-06-232
Report Date 06/28/93 16:35

Attn: Mitch Ritter

Project Phillips Petro James "A" Pit

Date Sampled 06/10/93 06/16/93

Sampled By Client _____

Sample Type Soil

Transported by Mitch Ritter

P.O. # _____

Date Received 06/17/93

Lab No.

- M3-06-232-01
- M3-06-232-02
- M3-06-232-03
- M3-06-232-04
- M3-06-232-05
- M3-06-232-06

Sample Identification

- 61093-1J
- 61193-2J
- 61293-3J
- 61493-4J
- 61593-5J
- 61693-6J

Reviewed By _____

SOUTHWESTERN LABORATORIES

JACK H. BARTON

Order # M3-06-232
06/28/93 16:35
Client: REGS

TEST RESULTS BY SAMPLE

Sample: 01A 61093-1J

Collected: 06/10/93

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection Limit</u>	<u>Date Started</u>	<u>Analyst</u>
TCLP PREP.	SW-846, 1311	06/22/93	Date		06/22/93	SLS
TCLP TPH	EPA 418.1	5.9	mg/L	0.50	06/22/93	SLS
ZERO HEADSPACE EXTRACTION	SW846 1311	06/22/93	Date		06/22/93	LWD

Sample: 02A 61193-2J

Collected: 06/11/93

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection Limit</u>	<u>Date Started</u>	<u>Analyst</u>
TCLP PREP.	SW-846, 1311	06/22/93	Date		06/22/93	SLS
TCLP TPH	EPA 418.1	1.5	mg/L	0.50	06/22/93	SLS
ZERO HEADSPACE EXTRACTION	SW846 1311	06/22/93	Date		06/22/93	LWD

Sample: 03A 61293-3J

Collected: 06/12/93

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection Limit</u>	<u>Date Started</u>	<u>Analyst</u>
TCLP PREP.	SW-846, 1311	06/22/93	Date		06/22/93	SLS
TCLP TPH	EPA 418.1	1.7	mg/L	0.50	06/22/93	SLS
ZERO HEADSPACE EXTRACTION	SW846 1311	06/22/93	Date		06/22/93	LWD

Sample: 04A 61493-4J

Collected: 06/14/93

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection Limit</u>	<u>Date Started</u>	<u>Analyst</u>
TCLP PREP.	SW-846, 1311	06/22/93	Date		06/22/93	SLS
TCLP TPH	EPA 418.1	22	mg/L	0.50	06/22/93	SLS
ZERO HEADSPACE EXTRACTION	SW846 1311	06/22/93	Date		06/22/93	LWD

Sample: 05A 61593-5J

Collected: 06/15/93

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection Limit</u>	<u>Date Started</u>	<u>Analyst</u>
TCLP PREP.	SW-846, 1311	06/22/93	Date		06/22/93	SLS
TCLP TPH	EPA 418.1	12	mg/L	0.50	06/22/93	SLS
ZERO HEADSPACE EXTRACTION	SW846 1311	06/22/93	Date		06/22/93	LWD

Order # M3-06-232
06/28/93 16:35
Client: REGS

TEST RESULTS BY SAMPLE

Sample: 06A 61693-6J

Collected: 06/16/93

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection Limit</u>	<u>Date Started</u>	<u>Analyst</u>
TCLP PREP.	SW-846, 1311	06/22/93	Date		06/22/93	SLS
TCLP TPH	EPA 418.1	12	mg/L	0.50	06/22/93	SLS
ZERO HEADSPACE EXTRACTION	SW846 1311	06/22/93	Date		06/22/93	LWD

Order # M3-06-232
06/28/93 16:35
Client: REGS

TEST RESULTS BY SAMPLE

Sample Description: 61093-1J
Test Description: TCLP BTEX
Collected: 06/10/93

Lab No: 01A
Method: SW-846, 8020 Test Code: BTX_TC

Date Started 06/22/93 Analyst LWD
Detection Limit 0.004 Units mg/L
Method SW-846, 8020

<u>Compound</u>	<u>Results</u>
BENZENE	<u>< 0.004</u>
TOLUENE	<u>0.019</u>
ETHYLBENZENE	<u>< 0.004</u>
XYLENE	<u>< 0.004</u>

Sample Description: 61193-2J
Test Description: TCLP BTEX
Collected: 06/11/93

Lab No: 02A
Method: SW-846, 8020 Test Code: BTX_TC

Date Started 06/22/93 Analyst LWD
Detection Limit 0.004 Units mg/L
Method SW-846, 8020

<u>Compound</u>	<u>Results</u>
BENZENE	<u>0.011</u>
TOLUENE	<u>0.17</u>
ETHYLBENZENE	<u>< 0.004</u>
XYLENE	<u>< 0.004</u>

Sample Description: 61293-3J
Test Description: TCLP BTEX
Collected: 06/12/93

Lab No: 03A
Method: SW-846, 8020 Test Code: BTX_TC

Date Started 06/22/93 Analyst LWD
Detection Limit 0.004 Units mg/L
Method SW-846, 8020

Order # M3-06-232

06/28/93 16:35

Client: REGS

Page 5

TEST RESULTS BY SAMPLE

Sample Description: 61293-3J
Test Description: TCLP BTEX
Collected: 06/12/93

Lab No: 03A
Method: SW-846, 8020 Test Code: BTX_TC

<u>Compound</u>	<u>Results</u>
BENZENE	<u>0.008</u>
TOLUENE	<u>0.029</u>
ETHYLBENZENE	<u>< 0.004</u>
XYLENE	<u>< 0.004</u>

Sample Description: 61493-4J
Test Description: TCLP BTEX
Collected: 06/14/93

Lab No: 04A
Method: SW-846, 8020 Test Code: BTX_TC

Date Started	<u>06/22/93</u>	Analyst	<u>LWD</u>
Detection Limit	<u>0.004</u>	Units	<u>mg/L</u>
Method	<u>SW-846, 8020</u>		

<u>Compound</u>	<u>Results</u>
BENZENE	<u>< 0.004</u>
TOLUENE	<u>0.10</u>
ETHYLBENZENE	<u>0.011</u>
XYLENE	<u>0.051</u>

Sample Description: 61593-5J
Test Description: TCLP BTEX
Collected: 06/15/93

Lab No: 05A
Method: SW-846, 8020 Test Code: BTX_TC

Date Started	<u>06/22/93</u>	Analyst	<u>LWD</u>
Detection Limit	<u>0.004</u>	Units	<u>mg/L</u>
Method	<u>SW-846, 8020</u>		

<u>Compound</u>	<u>Results</u>
BENZENE	<u>0.005</u>
TOLUENE	<u>0.020</u>

Order # M3-06-232
06/28/93 16:35
Client: REGS

TEST RESULTS BY SAMPLE

Sample Description: 61593-5J
Test Description: TCLP BTEX
Collected: 06/15/93

Lab No: 05A
Method: SW-846, 8020 Test Code: BTX_TC

ETHYLBENZENE < 0.004

XYLENE < 0.004

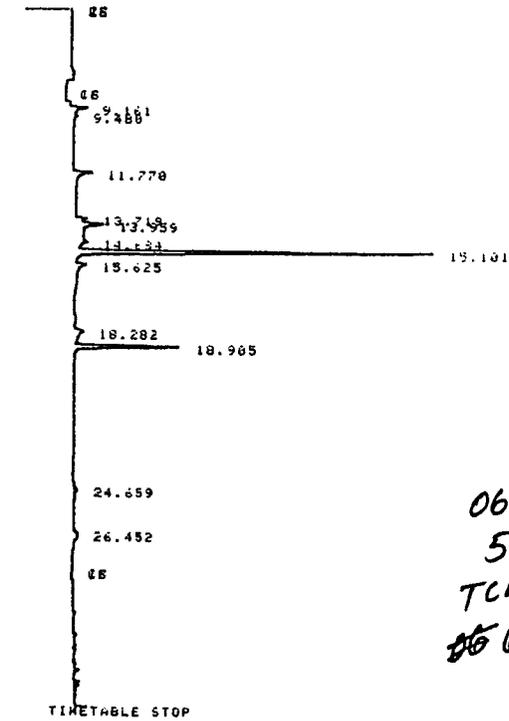
Sample Description: 61693-6J
Test Description: TCLP BTEX
Collected: 06/16/93

Lab No: 06A
Method: SW-846, 8020 Test Code: BTX_TC

Date Started 06/22/93 Analyst LWD
Detection Limit 0.004 Units mg/L
Method SW-846, 8020

<u>Compound</u>	<u>Results</u>
BENZENE	<u>0.014</u>
TOLUENE	<u>0.13</u>
ETHYLBENZENE	<u>0.007</u>
XYLENE	<u>0.033</u>

* RUN # 11 JUN 22, 1993 06:12:16
 START



0615801
 5mls
 TCLP Extract
 #6 61093-1J

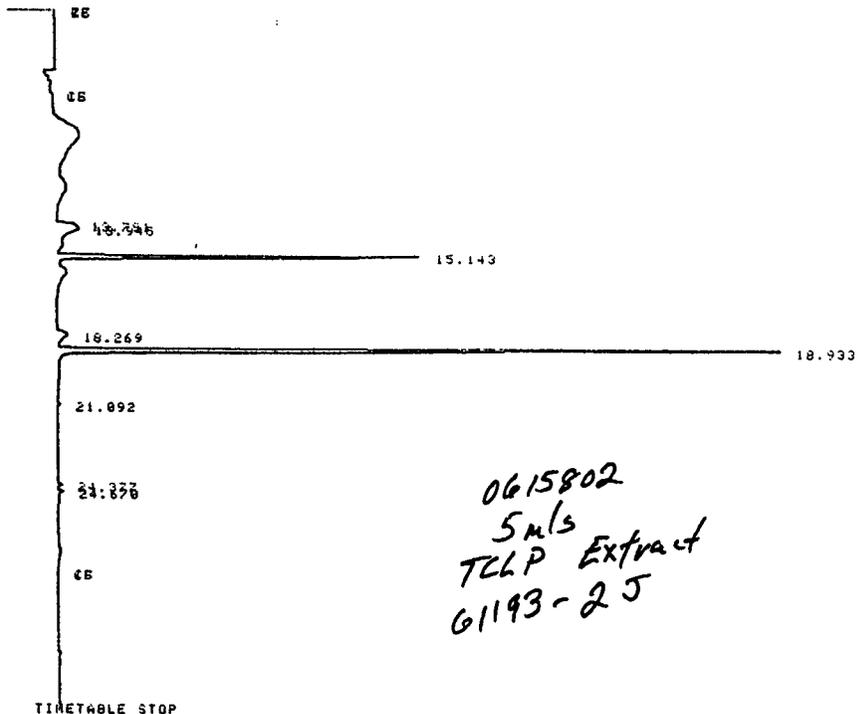
RUN# 11 JUN 22, 1993 06:12:16

RT	AREA	TYPE	WIDTH	AREA%
9.161	650790	PV	.194	5.06332
9.480	196124	VB	.161	1.76699
11.770	444971	PB	.145	4.00899
13.719	179486	PV	.096	1.61703
13.959	503657	VB	.147	5.25848
14.684	110207	BP	.112	.99291
15.101	6256691	FB	.104	56.36994
15.625	222604	BB	.131	2.08556
18.282	396690	PV	.258	3.57400
18.905	1765353	VB	.100	16.08522
24.659	37899	VB	.111	.86203
26.452	174880	BB	.220	1.57559

TMP-X
 OIX

* RUN # 12 JUN 22, 1993 07104139

STAFF



0615802
5mls
TCLP Extract
61193-25

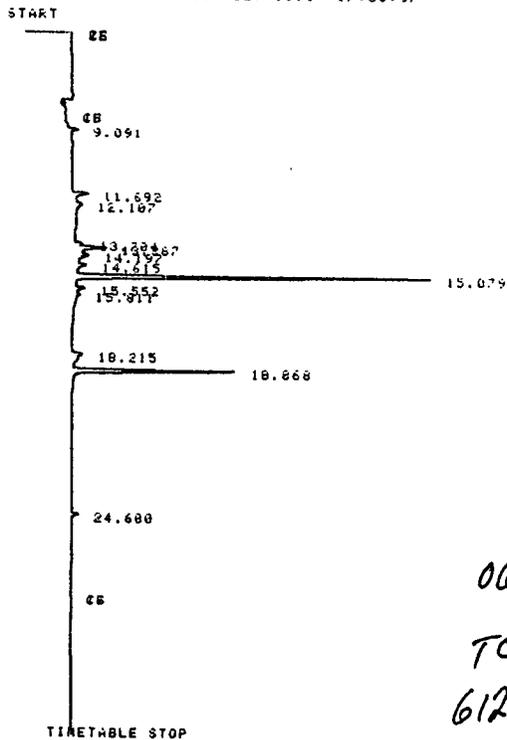
RUN# 12 JUN 22, 1993 07104139

AREAS

KT	AREA	TYPE	WIDTH	AREA%
13.791	290388	FV	.094	1.17435
13.945	1179516	VB	.326	4.75386
15.143	6293827	BB	.102	25.44951
18.269	510623	PP	.292	2.06500
18.933	16237072	PB	.096	65.66480
21.092	50814	BB	.098	.20550
24.377	74284	BP	.101	.50041
24.670	95790	FB	.102	.38738

B
B
T
E-B
MPK

* RUN # 13 JUN 22. 1993 07:56:37



RUN# 13 JUN 22. 1993 07:56:37

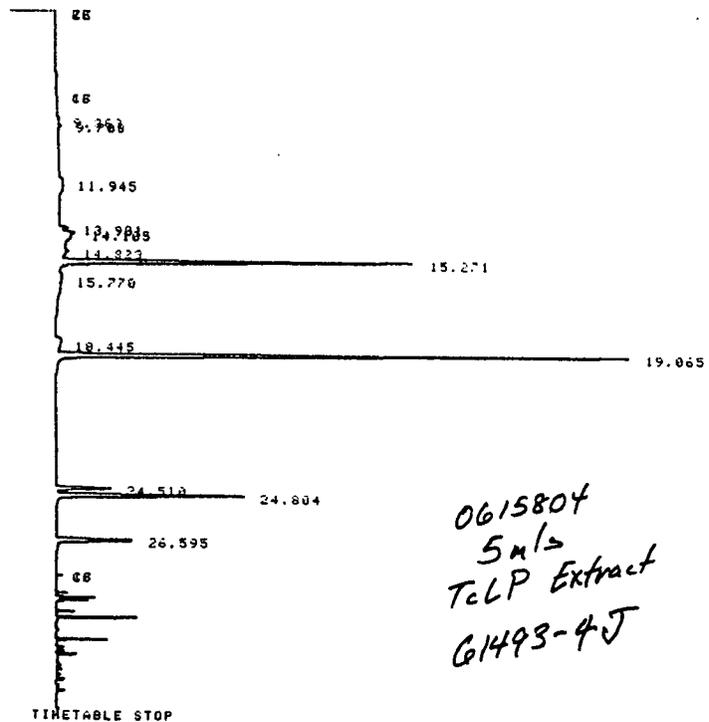
AREA#	RT	AREA	TYPE	WIDTH	WAREA#
	9.091	201129	PB	.126	1.62203
	11.692	339067	BV	.137	2.74090
	12.107	338640	VB	.254	2.73100
	13.704	151031	PV	.097	1.22446
	13.807	801650	VV	.150	6.46500
	14.197	460414	VV	.197	3.07435
	14.615	360028	VV	.188	1.90349
	15.079	6308109	VB	.104	50.87246
	15.552	203996	BV	.121	1.64915
	15.811	239695	VB	.235	1.93466
	18.215	134255	PB	.114	1.00272
	18.868	2724754	PB	.098	21.97409
	24.600	115285	BB	.102	.92973

0615803
5m/s
TCLP Extract
61293-3J

T
MPTX

* RUN # 14 JUN 22, 1993 00147137

START



0615804
5ml
TCLP Extract
G1493-4J

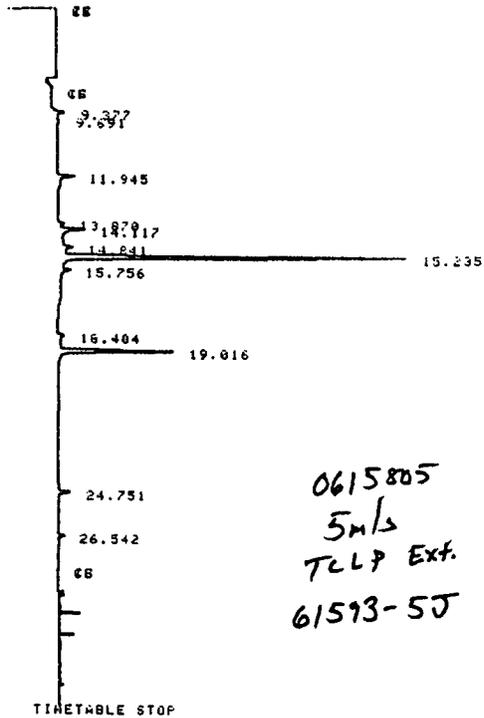
RUN# 14 JUN 22, 1993 00147137

AREA#

RT	AREA	TYPE	WIDTH	AREA%
9.303	70458	PB	.138	.31526
9.708	50035	BB	.098	.25967
11.945	62146	PB	.123	.27007
13.901	91250	PP	.670	.40029
14.105	179504	PB	.110	.60318
14.823	121161	BP	.169	.54213
15.271	6184253	PB	.104	27.671113
15.770	231098	BB	.357	1.03762
18.445	294073	PP	.306	1.31581
19.065	9420550	PB	.097	42.18757
24.510	937036	PV	.100	4.19630
24.804	3347360	PB	.105	14.97753
26.595	1342002	FB	.103	6.00740

B
T
FB
MPT
OT

* RUN # 15 JUN 22, 1993 15:25:02
START

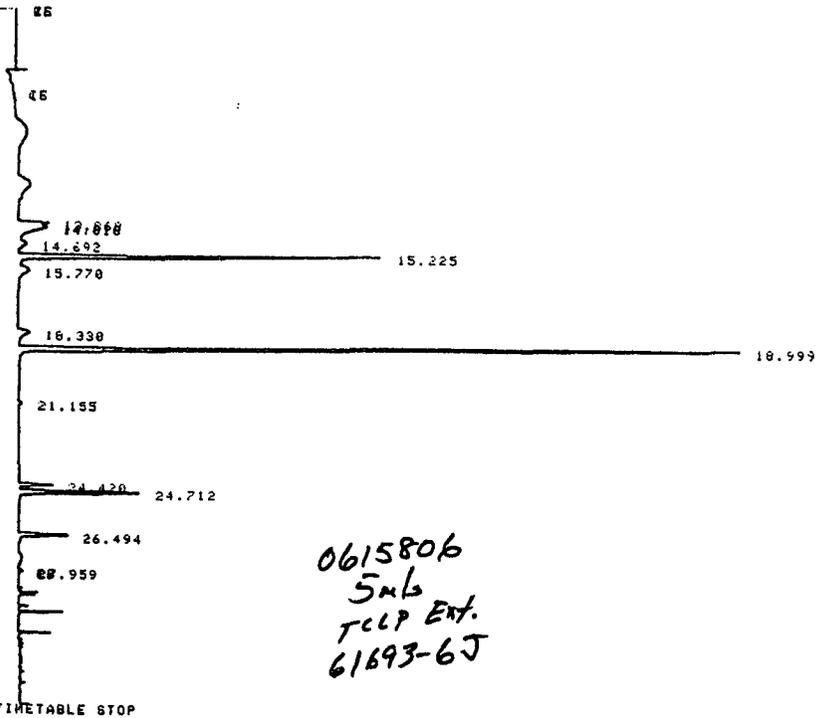


RUN# 15 JUN 22, 1993 15:25:02

AREA%	RT	AREA	TYPE	WIDTH	WREAR
	9.377	244591	PV	.132	2.43097
	9.691	85655	VB	.115	.85132
	11.945	298583	PB	.111	2.96759
	13.670	71725	PV	.069	.71287
	14.117	549329	VB	.131	5.45973 ^B
	14.641	195520	BV	.130	1.94326
	15.235	6054762	VB	.184	60.17778 ^S
	15.756	151824	SB	.105	1.50897
	16.404	135190	PE	.133	1.34564
	19.016	1940894	PB	.160	19.29039 ^T
	24.751	222919	SB	.102	2.21557 ^{M-X}
	26.542	110468	PE	.150	1.09795 ^{O-X}

* RUN # 16 JUN 22, 1993 16:16:22

START

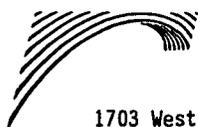


0615806
5mb
TCLP EXT.
61693-6J

RUN# 16 JUN 22, 1993 16:16:22

AREA#

RT	AREA	TYPE	WIDTH	AREA#
13.868	550644	BY	.103	2.13788
14.818	1405297	VY	.203	5.45410 B
14.692	419603	VP	.262	1.62052
15.225	6396122	PB	.104	24.82398 S
15.770	476778	BB	.264	1.85042
18.330	467211	PP	.235	1.01329
18.999	12352960	PB	.096	47.94306 T
21.155	79339	BB	.100	.50792
24.420	568610	PV	.098	2.20660 EB
24.712	2141090	VB	.104	8.30978 MPX
26.494	649781	PB	.103	3.29806 OK
27.959	56279	PH	.085	.32613



SOUTHWESTERN LABORATORIES

1703 West Industrial Avenue * P.O. Box 2150, Midland, Texas 79702 * 915/683-3349

Client REGS
119 N. Colorado Suite 201
Midland, Tx. 79701

Client No. 6750100
Report No. M3-06-233
Report Date 06/28/93 17:04

Attn: Mitch Ritter

Project Phillips

Date Sampled 06/10/93 06/16/93

Sampled By Client

Sample Type Soil

Transported by Mitch Ritter

P.O. # _____

Date Received 06/17/93

NOTE: Samples analyzed on TWC 7 Day Leachate

<u>Lab No.</u>
M3-06-233-01
M3-06-233-02
M3-06-233-03
M3-06-233-04
M3-06-233-05
M3-06-233-06

<u>Sample Identification</u>
61093-1J
61193-2J
61293-3J
61493-4J
61593-5J
61693-6J

ABJ
Reviewed By

SOUTHWESTERN LABORATORIES

JACK H. BARTON

Order # M3-06-233
06/28/93 16:41
Client: REGS

TEST RESULTS BY SAMPLE

Sample: 01A 61093-1J

Collected: 06/10/93 16:45

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection Limit</u>	<u>Date Started</u>	<u>Analyst</u>
7 DAY TPH	EPA 418.1	1.14	mg/L	0.50	06/25/93	SLS

Sample: 02A 61193-2J

Collected: 06/11/93 16:40

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection Limit</u>	<u>Date Started</u>	<u>Analyst</u>
7 DAY TPH	EPA 418.1	0.61	mg/L	0.50	06/25/93	SLS

Sample: 03A 61293-3J

Collected: 06/12/93 15:50

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection Limit</u>	<u>Date Started</u>	<u>Analyst</u>
7 DAY TPH	EPA 418.1	0.52	mg/L	0.50	06/25/93	SLS

Sample: 04A 61493-4J

Collected: 06/14/93 16:27

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection Limit</u>	<u>Date Started</u>	<u>Analyst</u>
7 DAY TPH	EPA 418.1	1.12	mg/L	0.50	06/25/93	SLS

Sample: 05A 61593-5J

Collected: 06/15/93 16:59

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection Limit</u>	<u>Date Started</u>	<u>Analyst</u>
7 DAY TPH	EPA 418.1	1.69	mg/L	0.50	06/25/93	SLS

Sample: 06A 61693-6J

Collected: 06/16/93 15:30

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection Limit</u>	<u>Date Started</u>	<u>Analyst</u>
7 DAY TPH	EPA 418.1	1.13	mg/L	0.50	06/25/93	SLS

Order # M3-06-233
06/28/93 16:41
Client: REGS

TEST RESULTS BY SAMPLE

Sample Description: 61093-1J
Test Description: 7 DAY BTEX
Collected: 06/10/93 16:45

Lab No: 01A
Method: EPA 602 Test Code: BTX_7D

Date Started 06/25/93 Analyst LWD
Detection Limit 0.004 Units mg/L
Method EPA 602

<u>Compound</u>	<u>Results</u>
BENZENE	<u>< 0.004</u>
TOLUENE	<u>< 0.004</u>
ETHYLBENZENE	<u>< 0.004</u>
XYLENE	<u>< 0.004</u>

Sample Description: 61193-2J
Test Description: 7 DAY BTEX
Collected: 06/11/93 16:40

Lab No: 02A
Method: EPA 602 Test Code: BTX_7D

Date Started 06/25/93 Analyst LWD
Detection Limit 0.004 Units mg/L
Method EPA 602

<u>Compound</u>	<u>Results</u>
BENZENE	<u>< 0.004</u>
TOLUENE	<u>< 0.004</u>
ETHYLBENZENE	<u>< 0.004</u>
XYLENE	<u>< 0.004</u>

Sample Description: 61293-3J
Test Description: 7 DAY BTEX
Collected: 06/12/93 15:50

Lab No: 03A
Method: EPA 602 Test Code: BTX_7D

Date Started 06/25/93 Analyst LWD
Detection Limit 0.004 Units mg/L
Method EPA 602

Order # M3-06-233
06/28/93 16:41
Client: REGS

TEST RESULTS BY SAMPLE

Sample Description: 61293-3J
Test Description: 7 DAY BTEX
Collected: 06/12/93 15:50

Lab No: 03A
Method: EPA 602 Test Code: BTX_7D

<u>Compound</u>	<u>Results</u>
BENZENE	< 0.004
TOLUENE	< 0.004
ETHYLBENZENE	< 0.004
XYLENE	< 0.004

Sample Description: 61493-4J
Test Description: 7 DAY BTEX
Collected: 06/14/93 16:27

Lab No: 04A
Method: EPA 602 Test Code: BTX_7D

Date Started 06/25/93 Analyst LWD
Detection Limit 0.004 Units mg/L
Method EPA 602

<u>Compound</u>	<u>Results</u>
BENZENE	< 0.004
TOLUENE	< 0.004
ETHYLBENZENE	< 0.004
XYLENE	< 0.004

Sample Description: 61593-5J
Test Description: 7 DAY BTEX
Collected: 06/15/93 16:59

Lab No: 05A
Method: EPA 602 Test Code: BTX_7D

Date Started 06/25/93 Analyst LWD
Detection Limit 0.004 Units mg/L
Method EPA 602

<u>Compound</u>	<u>Results</u>
BENZENE	< 0.004
TOLUENE	< 0.004

Order # M3-06-233
06/28/93 16:41
Client: REGS

TEST RESULTS BY SAMPLE

Sample Description: 61593-5J
Test Description: 7 DAY BTEX
Collected: 06/15/93 16:59

Lab No: 05A
Method: EPA 602 Test Code: BTX_7D

ETHYLBENZENE < 0.004

XYLENE < 0.004

Sample Description: 61693-6J
Test Description: 7 DAY BTEX
Collected: 06/16/93 15:30

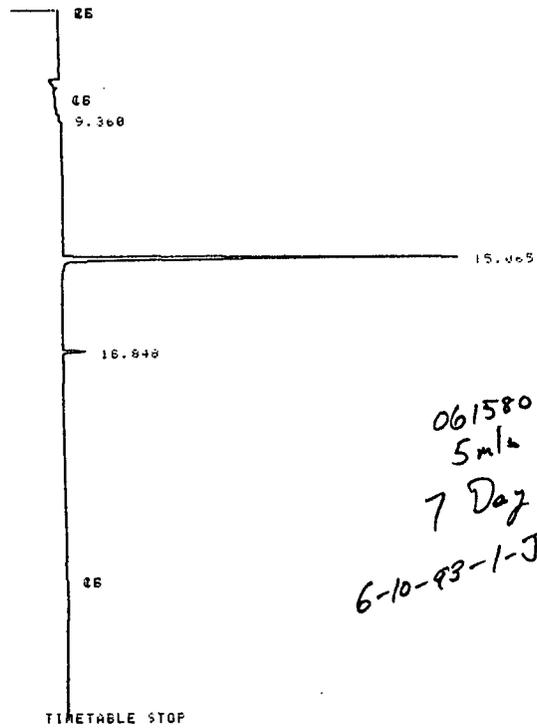
Lab No: 06A
Method: EPA 602 Test Code: BTX_7D

Date Started 06/25/93 Analyst LWD
Detection Limit 0.004 Units mg/L
Method EPA 602

<u>Compound</u>	<u>Results</u>
BENZENE	< <u>0.004</u>
TOLUENE	< <u>0.004</u>
ETHYLBENZENE	< <u>0.004</u>
XYLENE	< <u>0.004</u>

* RUN # 3 JUN 25, 1993 14:28:55

START



TIME TABLE STOP

Storing processed peaks to M106HC1228.PRO
Storing report to M106HC1228.RPT

RUN# 3 JUN 25, 1993 14:28:55

REPORT FILE: M106HC1228.RPT

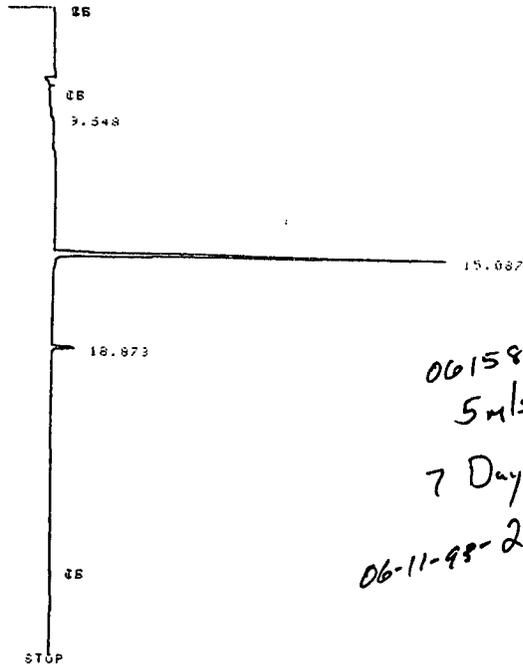
PEAK FILE 1: M106HC1228.PRO

AREA:

RT	AREA	TYPE	WIDTH	AREA%
9.368	77944	PV	.242	1.05562
15.065	6943418	BB	.104	94.03706
16.848	362342	BB	.056	4.90732

TOTAL AREA=7363702
MUL FACTOR=1.0000E+00

* RUN # 4 JUN 25. 1993 15:23:52
STRT



0615802
5mls
7 Day Leach
06-11-93-2-J

Storing processed peaks to M106HC1F0A.PRO
Storing report to M106HC1F0A.RPT

RUN# 4 JUN 25. 1993 15:23:52

REPORT FILE: M106HC1F0A.RPT

PEAK FILE : M106HC1F0A.PRO

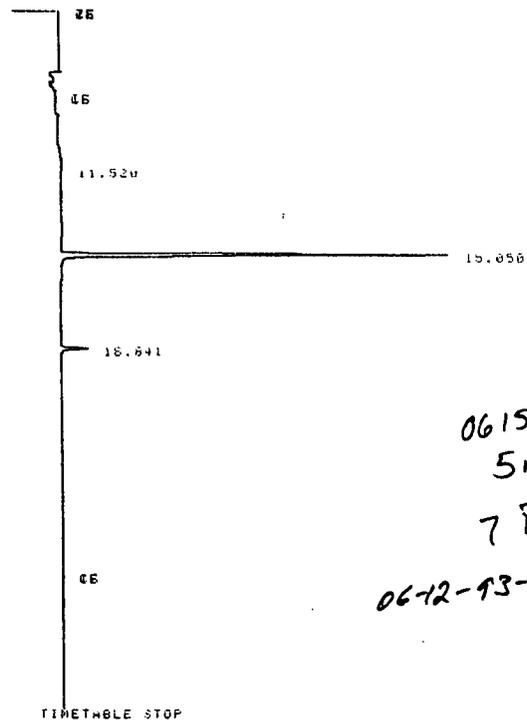
AREA#

RT	AREA	TYPE	WIDTH	AREA#
9.548	24621	PB	.083	.33930
15.087	6921341	BB	.104	74.01395
18.873	369187	BB	.097	5.04675

TOTAL AREA=7315347

MUL FACTOR=1.0000E+00

RUN # 5 JUN 25, 1993 16:13:47
START



0615803
5mls
7 Day Leach
06-12-13-3-J

Stopping processed peaks to M:\06AC2ABD.PRO
Stopping report to M:\06AC2ABD.RPT

RUN# 5 JUN 25, 1993 16:13:47

REPORT FILE: M:\06AC2ABD.RPT

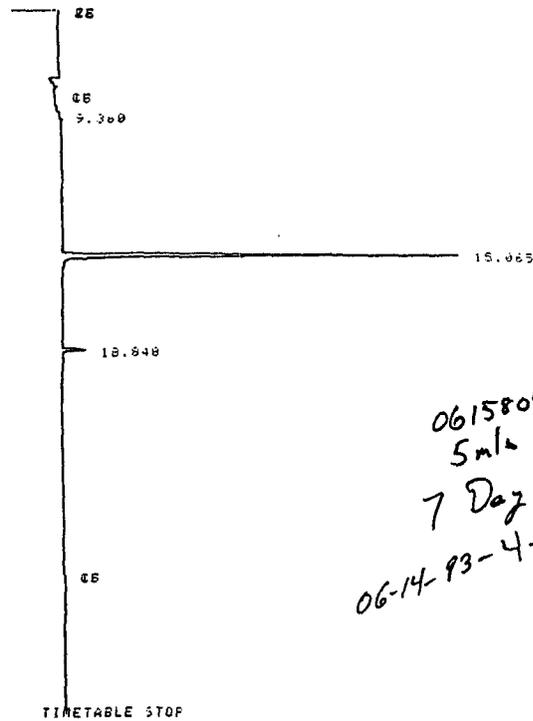
PEAK FILE : M:\06AC2ABD.PRO

AREA#

RT	AREA	TYPE	WIDTH	AREA%
11.520	432936	BB	3.412	5.65300
15.050	6779802	BB	.103	88.64921
18.841	435761	BB	.098	5.64779

TOTAL AREA=7647598
MUL FACTOR=1.0000E+00

RUN # 6 JUN 25, 1993 17:04:49
START



Storing processed peaks to M:\06AC36B2.PRO
Storing report to M:\06AC36B2.RPT

RUN# 6 JUN 25, 1993 17:04:49

REPORT FILE: M:\06AC36B2.RPT

PEAK FILE: M:\06AC36B2.PRO

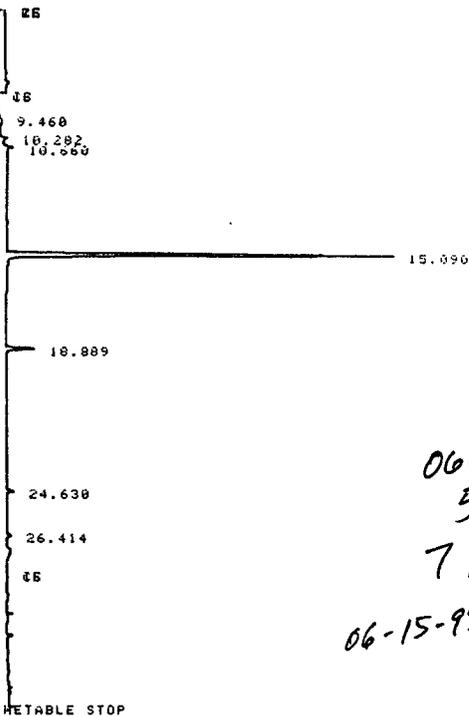
AREA:

RT	AREA	TYPE	WIDTH	AREA%
9.360	77944	PV	.242	1.05562
15.065	6943416	BB	.104	94.037065
16.848	302542	BB	.096	4.90732

TOTHL AREA=7393702
MUL FACTOR=1.0000E+00

* RUN # 7 JUN 25, 1993 17:57:10

STAFF



0615805
5mls
7 Day Leach
06-15-93-5-5

Storing processed peaks to M106AC42F7.PRO
Storing report to M106AC42F7.RPT

RUN# 7 JUN 25, 1993 17:57:10

REPORT FILE: M106AC42F7.RPT

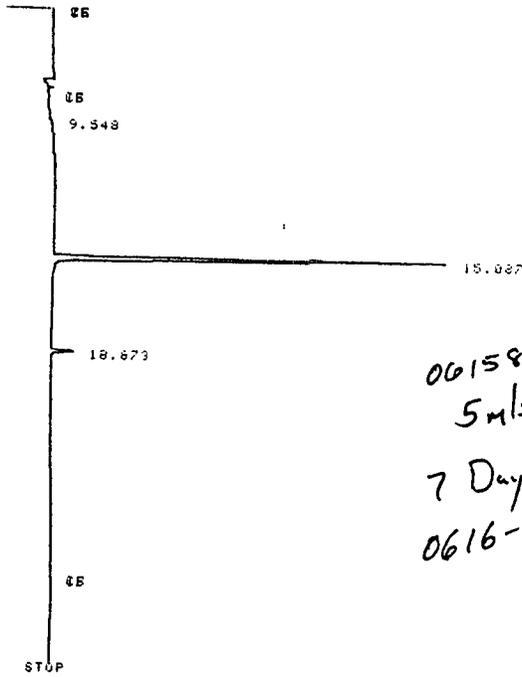
PEAK FILE: M106AC42F7.PRO

AREA%:

RT	AREA	TYPE	WIDTH	AREA%
9.460	53066	BB	.216	.65276
10.282	213788	BY	.154	2.62980
10.660	464193	YV	.206	5.71803
15.090	6760730	BB	.103	83.15355
18.889	454930	BB	.096	5.59608
24.630	117733	BB	.094	1.44823
26.414	65000	BP	.090	.79956

TOTAL AREA=6129437
MUL FACTOR=1.0000E+00

* RUN # 8 JUN 25, 1993 18:49:25
START



0615806
5mls
7 Day Leach
0616-93-6J

Storing processed peaks to M106AC4F36.PRO
Storing report to M106AC4F36.RPT

RUN# 8 JUN 25, 1993 18:49:25

REPORT FILE: M106AC4F36.RPT

PEAK FILE: M106AC4F36.PRO

AREA%

RT	AREA	TYPE	WIDTH	AREA%
9.548	24821	FB	.083	.33930
15.087	6921341	BB	.104	94.61395
18.873	369187	BB	.097	5.04675

TOTAL AREA=7315347
MUL FACTOR=1.0000E+00



RITTER ENVIRONMENTAL & GEOTECHNICAL SERVICES
 119 N. Colorado, Suite 201, Midland, Texas 79701
 Bus: (915) 682-7404 • Metro: (915) 570-6007 • Fax: (915) 682-7440

REPORT TO	INVOICE TO
COMPANY: <i>REGS</i>	COMPANY: <i>REGS</i>
ADDRESS: <i>119 N. Colorado SUITE 201</i>	ADDRESS:
CITY/STATE/ZIP: <i>MIDLAND, TX 79701</i>	CITY/STATE/ZIP:
ATTENTION: <i>M. RITTER</i> PHONE #: <i>682-7404</i>	ATTENTION: PHONE #:
REMARKS: <i>CALL WHEN READY</i>	TURN AROUND TIME
	<input type="checkbox"/> NORMAL <input type="checkbox"/> RUSH <input type="checkbox"/> OTHER

PROJECT/SITE NAME:

Phillips PETROLEUM

JAMES "A" PIT - Eddy Co. N.M.

DATE	TIME	COMP.	GRAB	SAMPLE #	SAMPLE DESCRIPTION	MATRIX	# CONT	REQUESTED ANALYSIS				REMARKS
								TPH*	BTEX*			
<i>6/10/93</i>	<i>4:45 P</i>		<i>✓</i>	<i>61093-1J</i>	<i>SOIL from Solidified Pit</i>		<i>1</i>	<i>✓</i>	<i>✓</i>			
<i>6/11/93</i>	<i>4:40 p</i>		<i>✓</i>	<i>61193-2J</i>	<i>" "</i>		<i>1</i>	<i>✓</i>	<i>✓</i>			
<i>6/12/93</i>	<i>3:50 p</i>		<i>✓</i>	<i>61293-3J</i>	<i>" "</i>		<i>1</i>	<i>✓</i>	<i>✓</i>			
<i>6/14/93</i>	<i>4:27 p</i>		<i>✓</i>	<i>61493-4J</i>	<i>" "</i>		<i>1</i>	<i>✓</i>	<i>✓</i>			
<i>6/15/93</i>	<i>4:59 p</i>		<i>✓</i>	<i>61593-5J</i>	<i>" "</i>		<i>1</i>	<i>✓</i>	<i>✓</i>			
<i>6/16/93</i>	<i>3:30 p</i>		<i>✓</i>	<i>61693-6J</i>	<i>" "</i>		<i>1</i>	<i>✓</i>	<i>✓</i>			

RELINQUISHED BY: (SIGN)	DATE/TIME	RECEIVED BY:	DATE/TIME	SAMPLE CONDITION:	DATE/TIME
<i>Mitch Pitts</i>	<i>6/17/93 10:28 AM</i>	<i>[Signature]</i>	<i>6/17/93 10:30 AM</i>		

SOUTHWESTERN LABORATORIES, INC.
QA/QC Statement
Midland EAS

Date Received Jun 17, 1993
 TPH Analyst S. Stovall

Sample Matrix Solid
 BTEX Analyst L. Duty

Test Parameter	Date of Analysis	Percent Recovery (spike)	Percent Deviation (duplicate)	Blank Concentration (mg/L)	Percent of Known	Method of Analysis
Eenzene	Jun 22, 1993	103	0	< 0.02	96	SW-846, 8020
Toluene	Jun 22, 1993	106	0	< 0.02	95	SW-846, 8020
Ethylbenzene	Jun 22, 1993	99	0	< 0.02	99	SW-846, 8020
m,p-Xylenes	Jun 22, 1993	99	0	< 0.02	98	SW-846, 8020
o-Xylene	Jun 22, 1993	110	0	< 0.02	98	SW-846, 8020
Total Petroleum Hydrocarbons	Jun 18, 1993	87	0.03	< 5.0	87	SW-846, 3550; EPA 418.1

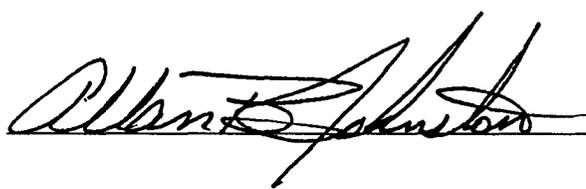
Applicable BTEX Lab Numbers M3-06-231-(01 thru 06)

Applicable TPH Lab Numbers M3-06-231-(01 thru 06), M3-06-164(01 thru 04), M3-06-165-01

Lab spike no. (BTEX) M3-06-231-01 Lab dup. no. (BTEX) M3-06-231-01

Lab spike no. (TPH) M3-06-164-01 Lab dup. no. (TPH) M3-06-165-01

Notes _____

Reviewed by 

SOUTHWESTERN LABORATORIES, INC.
QA/QC Statement
Midland EAS

Date Received Jun 17, 1993
 TPH Analyst S. Stovall

Sample Matrix TCLP Extract
 BTEX Analyst L. Duty

Test Parameter	Date of Analysis	Percent Recovery (spike)	Percent Deviation (duplicate)	Blank Concentration (mg/L)	Percent of Known	Method of Analysis
Benzene	Jun 22, 1993	103	0	< 0.004	96	SW-846, 8020
Toluene	Jun 22, 1993	106	0	< 0.004	95	SW-846, 8020
Ethylbenzene	Jun 22, 1993	99	0	< 0.004	98	SW-846, 8020
m,p-Xylenes	Jun 22, 1993	99	0	< 0.004	95	SW-846, 8020
o-Xylene	Jun 22, 1993	110	0	< 0.004	96	SW-846, 8020
Total Petroleum Hydrocarbons	Jun 22, 1993	83	4.4	< 0.50	87	EPA 418.1

Applicable BTEX Lab Numbers M3-06-232-(01 thru 06)

Applicable TPH Lab Numbers M3-06-232-(01 thru 06)

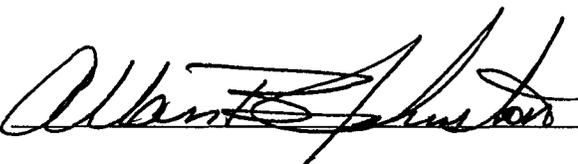
Lab spike no. (BTEX) M3-06-232-01

Lab dup. no. (BTEX) M3-06-232-01

Lab spike no. (TPH) Blank

Lab dup. no. (TPH) Known

Notes _____

Reviewed by 

SOUTHWESTERN LABORATORIES, INC.
QA/QC Statement
Midland EAS

Date Received Jun 17, 1993
 TPH Analyst S. Stovall

Sample Matrix 7 Day Leach
 BTEX Analyst L. Duty

Test Parameter	Date of Analysis	Percent Recovery (spike)	Percent Deviation (duplicate)	Blank Concentration (mg/L)	Percent of Known	Method of Analysis
Eenzene	Jun 25, 1993	100	0	< 0.004	103	EPA 602
Toluene	Jun 25, 1993	100	0	< 0.004	101	EPA 602
Ethylbenzene	Jun 25, 1993	101	0	< 0.004	103	EPA 602
m,p-Xylenes	Jun 25, 1993	100	0	< 0.004	101	EPA 602
o-Xylene	Jun 25, 1993	102	0	< 0.004	101	EPA 602
Total Petroleum Hydrocarbons	Jun 25, 1993	90	4.0	< 0.50	95	EPA 418.1

Applicable BTEX Lab Numbers M3-06-233-(01 thru 06)

Applicable TPH Lab Numbers M3-06-233-(01 thru 06)

Lab spike no. (BTEX) M3-06-233-01

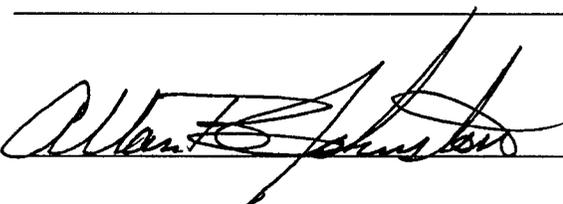
Lab dup. no. (BTEX) M3-06-233-01

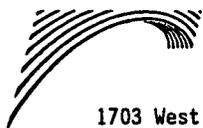
Lab spike no. (TPH) Blank

Lab dup. no. (TPH) Known

Notes _____

Reviewed by





SOUTHWESTERN LABORATORIES

1703 West Industrial Avenue * P.O. Box 2150, Midland, Texas 79702 * 915/683-3349

Client REGS
119 N. Colorado Suite 201
Midland, Tx. 79701

Client No. 6750100
Report No. M3-06-232
Report Date 07/06/93 12:57

Attn: Mitch Ritter

Project Phillips Petro James "A" Pit

Date Sampled 06/10/93 06/16/93

Sampled By Client

Sample Type Soil

Transported by Mitch Ritter

P.O. # _____

Date Received 06/17/93

NOTE: TCLP TPH analysis was performed on the semi-volatile extraction fluid.

Lab No.

M3-06-232-01
M3-06-232-02
M3-06-232-03
M3-06-232-04
M3-06-232-05
M3-06-232-06

Sample Identification

61093-1J
61193-2J
61293-3J
61493-4J
61593-5J
61693-6J

Jn
Reviewed By

SOUTHWESTERN LABORATORIES

ALLAN B. JOHNSTON

Order # M3-06-232
07/06/93 11:18
Client: REGS

Page 2

TEST RESULTS BY SAMPLE

Sample: 01A 61093-1J

Collected: 06/10/93

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection Limit</u>	<u>Date Started</u>	<u>Analyst</u>
TCLP PREP.	SW-846, 1311	06/22/93	Date		06/22/93	SLS
TCLP TPH	EPA 418.1	5.9	mg/L	0.50	06/22/93	SLS
ZERO HEADSPACE EXTRACTION	SW846 1311	06/22/93	Date		06/22/93	LWD

Sample: 02A 61193-2J

Collected: 06/11/93

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection Limit</u>	<u>Date Started</u>	<u>Analyst</u>
TCLP PREP.	SW-846, 1311	06/22/93	Date		06/22/93	SLS
TCLP TPH	EPA 418.1	1.5	mg/L	0.50	06/22/93	SLS
ZERO HEADSPACE EXTRACTION	SW846 1311	06/22/93	Date		06/22/93	LWD

Sample: 03A 61293-3J

Collected: 06/12/93

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection Limit</u>	<u>Date Started</u>	<u>Analyst</u>
TCLP PREP.	SW-846, 1311	06/22/93	Date		06/22/93	SLS
TCLP TPH	EPA 418.1	1.7	mg/L	0.50	06/22/93	SLS
ZERO HEADSPACE EXTRACTION	SW846 1311	06/22/93	Date		06/22/93	LWD

Sample: 04A 61493-4J

Collected: 06/14/93

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection Limit</u>	<u>Date Started</u>	<u>Analyst</u>
TCLP PREP.	SW-846, 1311	06/22/93	Date		06/22/93	SLS
TCLP TPH	EPA 418.1	22	mg/L	0.50	06/22/93	SLS
ZERO HEADSPACE EXTRACTION	SW846 1311	06/22/93	Date		06/22/93	LWD

Sample: 05A 61593-5J

Collected: 06/15/93

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection Limit</u>	<u>Date Started</u>	<u>Analyst</u>
TCLP PREP.	SW-846, 1311	06/22/93	Date		06/22/93	SLS
TCLP TPH	EPA 418.1	12	mg/L	0.50	06/22/93	SLS
ZERO HEADSPACE EXTRACTION	SW846 1311	06/22/93	Date		06/22/93	LWD

Order # M3-06-232
07/06/93 11:18
Client: REGS

Page 3

TEST RESULTS BY SAMPLE

Sample: 06A 61693-6J

Collected: 06/16/93

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection</u>	<u>Date</u>	<u>Analyst</u>
TCLP PREP.	SW-846, 1311	06/22/93	Date		06/22/93	SLS
TCLP TPH	EPA 418.1	12	mg/L	0.50	06/22/93	SLS
ZERO HEADSPACE EXTRACTION	SW846 1311	06/22/93	Date		06/22/93	LWD

Order # M3-06-232
07/06/93 11:18
Client: REGS

TEST RESULTS BY SAMPLE

Sample Description: 61093-1J
Test Description: TCLP BTEX
Collected: 06/10/93

Lab No: 01A
Method: SW-846, 8020 Test Code: BTX_TC

Date Started 06/22/93 Analyst LWD
Detection Limit 0.004 Units mg/L
Method SW-846, 8020

<u>Compound</u>	<u>Results</u>
BENZENE	<u>< 0.004</u>
TOLUENE	<u>0.019</u>
ETHYLBENZENE	<u>< 0.004</u>
XYLENE	<u>< 0.004</u>

Order # M3-06-232
07/06/93 11:18
Client: REGS

TEST RESULTS BY SAMPLE

Sample Description: 61093-1J
Test Description: TCLP TPH
Collected: 06/10/93

Lab No: 01A
Method: EPA 418.1 Test Code: TPH_T

<u>Parameter</u>	<u>Results</u>	<u>Detection</u> <u>Limit</u>	<u>Units</u>	<u>Date</u> <u>Started</u>	<u>Analyst</u>
TOTAL PETROLEUM HYDROCARBONS	<u>118</u>	<u>5</u>	<u>mg/kg</u>	<u>06/22/93</u>	<u>SLS</u>

Order # M3-06-232
07/06/93 11:18
Client: REGS

TEST RESULTS BY SAMPLE

Sample Description: 61193-2J
Test Description: TCLP BTEX
Collected: 06/11/93

Lab No: 02A
Method: SW-846, 8020 Test Code: BTX_TC

Date Started 06/22/93 Analyst LWD
Detection Limit 0.004 Units mg/L
Method SW-846, 8020

<u>Compound</u>	<u>Results</u>
BENZENE	<u>0.011</u>
TOLUENE	<u>0.17</u>
ETHYLBENZENE	<u>< 0.004</u>
XYLENE	<u>< 0.004</u>

Order # M3-06-232
07/06/93 11:18
Client: REGS

TEST RESULTS BY SAMPLE

Sample Description: 61193-2J
Test Description: TCLP TPH
Collected: 06/11/93

Lab No: 02A
Method: EPA 418.1 Test Code: TPH_T

<u>Parameter</u>	<u>Results</u>	<u>Detection</u> <u>Limit</u>	<u>Units</u>	<u>Date</u> <u>Started</u>	<u>Analyst</u>
TOTAL PETROLEUM HYDROCARBONS	<u>31</u>	<u>5</u>	<u>mg/kg</u>	<u>06/22/93</u>	<u>SLS</u>

Order # M3-06-232
07/06/93 11:18
Client: REGS

TEST RESULTS BY SAMPLE

Sample Description: 61293-3J
Test Description: TCLP BTEX
Collected: 06/12/93

Lab No: 03A
Method: SW-846, 8020 Test Code: BTX_TC

Date Started 06/22/93 Analyst LWD
Detection Limit 0.004 Units mg/L
Method SW-846, 8020

<u>Compound</u>	<u>Results</u>
BENZENE	<u>0.008</u>
TOLUENE	<u>0.029</u>
ETHYLBENZENE	<u>< 0.004</u>
XYLENE	<u>< 0.004</u>

Order # M3-06-232

07/06/93 11:18

Client: REGS

Page 9

TEST RESULTS BY SAMPLE

Sample Description: 61293-3J

Test Description: TCLP TPH

Collected: 06/12/93

Lab No: 03A

Method: EPA 418.1 Test Code: TPH_T

<u>Parameter</u>	<u>Results</u>	<u>Detection</u> <u>Limit</u>	<u>Units</u>	<u>Date</u> <u>Started</u>	<u>Analyst</u>
TOTAL PETROLEUM HYDROCARBONS	<u>34</u>	<u>5</u>	<u>mg/kg</u>	<u>06/22/93</u>	<u>SLS</u>

Order # M3-06-232
07/06/93 11:18
Client: REGS

TEST RESULTS BY SAMPLE

Sample Description: 61493-4J
Test Description: TCLP BTEX
Collected: 06/14/93

Lab No: 04A
Method: SW-846, 8020 Test Code: BTX_TC

Date Started 06/22/93 Analyst LWD
Detection Limit 0.004 Units mg/L
Method SW-846, 8020

<u>Compound</u>	<u>Results</u>
BENZENE	<u>< 0.004</u>
TOLUENE	<u>0.10</u>
ETHYLBENZENE	<u>0.011</u>
XYLENE	<u>0.051</u>

Order # M3-06-232
07/06/93 11:18
Client: REGS

TEST RESULTS BY SAMPLE

Sample Description: 61493-4J
Test Description: TCLP TPH
Collected: 06/14/93

Lab No: 04A
Method: EPA 418.1 Test Code: TPH_T

<u>Parameter</u>	<u>Results</u>	<u>Detection</u> <u>Limit</u>	<u>Units</u>	<u>Date</u> <u>Started</u>	<u>Analyst</u>
TOTAL PETROLEUM HYDROCARBONS	<u>443</u>	<u>5</u>	<u>mg/kg</u>	<u>06/22/93</u>	<u>SLS</u>

Order # M3-06-232
07/06/93 11:18
Client: REGS

TEST RESULTS BY SAMPLE

Sample Description: 61593-5J
Test Description: TCLP BTEX
Collected: 06/15/93

Lab No: 05A
Method: SW-846, 8020 Test Code: BTX_TC

Date Started 06/22/93 Analyst LWD
Detection Limit 0.004 Units mg/L
Method SW-846, 8020

<u>Compound</u>	<u>Results</u>
BENZENE	<u>0.005</u>
TOLUENE	<u>0.020</u>
ETHYLBENZENE	<u>< 0.004</u>
XYLENE	<u>< 0.004</u>

Order # M3-06-232
07/06/93 11:18
Client: REGS

TEST RESULTS BY SAMPLE

Sample Description: 61593-5J
Test Description: TCLP TPH
Collected: 06/15/93

Lab No: 05A
Method: EPA 418.1 Test Code: TPH_T

<u>Parameter</u>	<u>Results</u>	<u>Detection</u> <u>Limit</u>	<u>Units</u>	<u>Date</u> <u>Started</u>	<u>Analyst</u>
TOTAL PETROLEUM HYDROCARBONS	<u>234</u>	<u>5</u>	<u>mg/kg</u>	<u>06/22/93</u>	<u>SLS</u>

Order # M3-06-232
07/06/93 11:18
Client: REGS

TEST RESULTS BY SAMPLE

Sample Description: 61693-6J
Test Description: TCLP TPH
Collected: 06/16/93

Lab No: 06A
Method: EPA 418.1 Test Code: TPH_T

<u>Parameter</u>	<u>Results</u>	<u>Detection</u> <u>Limit</u>	<u>Units</u>	<u>Date</u> <u>Started</u>	<u>Analyst</u>
TOTAL PETROLEUM HYDROCARBONS	<u>232</u>	<u>5</u>	<u>mg/kg</u>	<u>06/22/93</u>	<u>SLS</u>

Order # M3-06-232
07/06/93 11:18
Client: REGS

TEST RESULTS BY SAMPLE

Sample Description: 61693-6J
Test Description: TCLP BTEX
Collected: 06/16/93

Lab No: 06A
Method: SW-846, 8020 Test Code: BTX_TC

Date Started 06/22/93 Analyst LWD
Detection Limit 0.004 Units mg/L
Method SW-846, 8020

<u>Compound</u>	<u>Results</u>
BENZENE	<u>0.014</u>
TOLUENE	<u>0.13</u>
ETHYLBENZENE	<u>0.007</u>
XYLENE	<u>0.033</u>

SWL

SOUTHWESTERN LABORATORIES, INC.

QA/QC Statement
Midland EAS

Test Parameter Lead

Method of Analysis SM 3500-Pb, D

Analyst G. Bunch

Matrix Water

Date Received Jun 16, 1993

Date of Analysis Jun 22, 1993

Blank
Concentration < 0.01

Percent Recovery
of Known 103

Percent Recovery
(spike) 102

Percent Deviation
(duplicate) 0

Lab spike number M3-06-159-07

Lab dup. number M3-06-159-08

Applicable Lab Numbers M3-06-125-01, M3-06-159-(07 thru 08)

Notes _____

Reviewed by

SOUTHWESTERN LABORATORIES, INC.
QA/QC Statement
Midland EAS

Date Received Jun 16, 1993
 TPH Analyst S. Stovall

Sample Matrix Water
 BTEX Analyst L. Duty

Test Parameter	Date of Analysis	Percent Recovery (spike)	Percent Deviation (duplicate)	Blank Concentration (mg/L)	Percent of Known	Method of Analysis
Benzene	Jun 21, 1993	104	0	< 0.004	96	EPA 602
Toluene	Jun 21, 1993	108	0	< 0.004	95	EPA 602
Ethylbenzene	Jun 21, 1993	107	0	< 0.004	98	EPA 602
m,p-Xylenes	Jun 21, 1993	107	0	< 0.004	95	EPA 602
o-Xylene	Jun 21, 1993	108	0	< 0.004	96	EPA 602
Total Petroleum Hydrocarbons	Jun 21, 1993	80	5.9	< 0.50	91	EPA 418.1

Applicable BTEX Lab Numbers M3-06-159-(01 thru 08), M3-06-165-01

Applicable TPH Lab Numbers M3-06-159-(01 thru 08)

Lab spike no. (BTEX) M3-06-159-01 Lab dup. no. (BTEX) M3-06-159-01

Lab spike no. (TPH) Blank Lab dup. no. (TPH) M3-06-159-06

Notes _____

Reviewed by 