

3R - 137

**GENERAL
CORRESPONDENCE**

YEAR(S):

1996-1992

BLAGG ENGINEERING, INC.

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

September 4, 1996

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

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

Dear Mr. Walker:

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

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

Additional Evaluation of Hydrocarbon Impacts

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

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

Groundwater Sampling

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

Table 1
Groundwater sampling Results
Duncan Oil
North Hogback Unit

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

Implementation of In-Situ Soil Reclamation

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

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

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

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

Respectfully submitted,
Blagg Engineering, Inc.

Robert E. O'Neill

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

Reviewed by:

Jeffrey C. Blagg

Jeffrey C. Blagg, PE
President

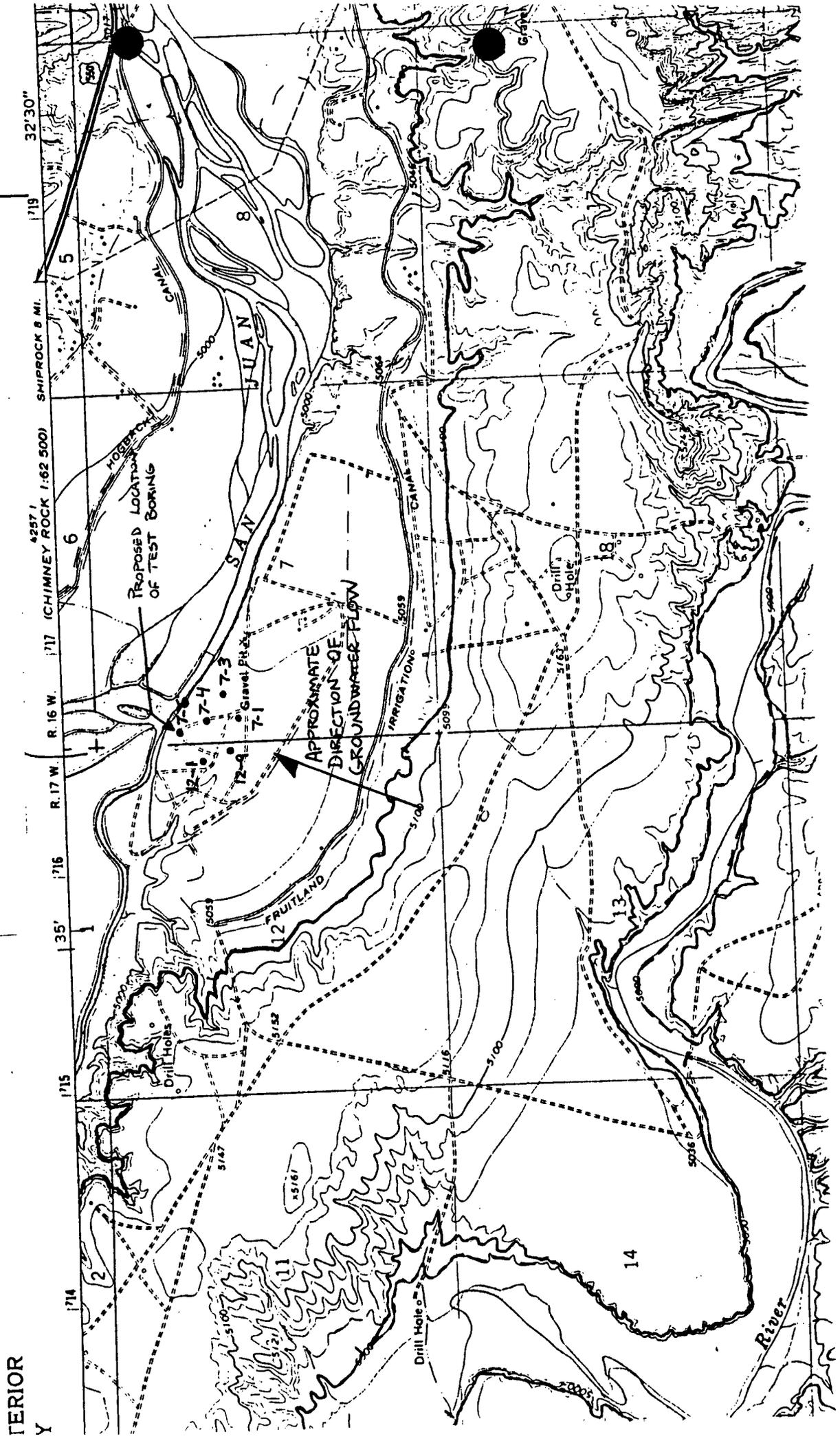
Attachments: Site Diagrams
Laboratory Reports
QA/QC

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

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

FIGURE 1

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





89.3

MW #3
(89.26)

CULTIVATED
FIELD

GROUNDWATER
FLOW

89.1

88.9

MW #1
(88.86)

PIT

MW #2
(88.73)

88.7

LEGEND



GROUNDWATER
MONITORING WELL

(88.86)

GROUNDWATER
ELEVATION



0 10 20 30 40
FEET

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

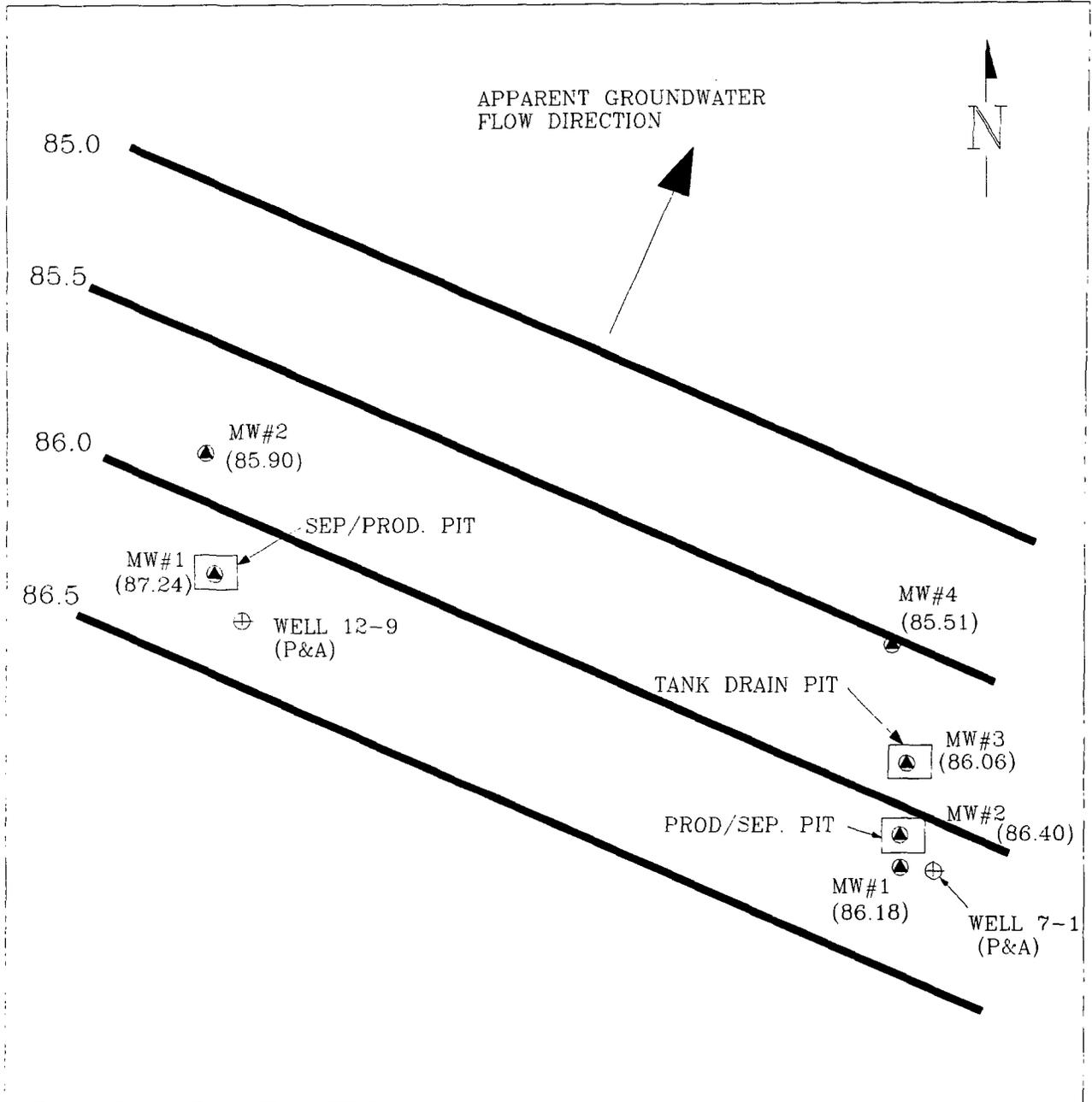
BLAGG ENGINEERING, INC.

SITE
DIAGRAM

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

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

DUNCAN ENERGY COMPANY



LEGEND

 GROUNDWATER MONITORING WELL

(86.64) GROUNDWATER ELEVATION



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

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

DUNCAN ENERGY COMPANY

BLAGG ENGINEERING, INC.


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

SITE
DIAGRAM

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

BLAGG ENGINEERING, INC.

FIELD BORING LOG

TEST BORING No. 1	MONITOR WELL No. A	PROJECT No.	PROJECT NAME: DUNCAN OIL INC.		SHEET: 1 of 1	
MFG. DESIGNATION OF DRILL: EXCAVATOR / MOBILE DRILL - B-61			PROJECT LOCATION: NORTH HOBBACK SECTION 7, WELL #6			
TYPE OF BIT: 8" RUBBER - SPLIT SPOON SAMPLER				SURFACE ELEVATION OF TB OR MW: 0	TOTAL DEPTH OF HOLE: EXCAVATE TO 18' DRILL 18'	
DATE	STARTED 6-24-96 8:30-10:30	COMPLETED 6-26-96 8:30-12:00	DRILLING Co.: ENVIROTECH			
COMPLETION TYPE: MONITOR WELL		15' SCREEN	ENGINEER: RLO	CREW: N	GROUNDWATER DEPTH: _____ TIME: _____	
SURFACE CONDITIONS: COBBLE						
DIST FROM SURF.	SAMPLE TYPE	SAMPLE No.	QVM READ IN PPM	BLOWS PER 6 IN.	USCS	LOG OF MATERIAL/COMMENTS
2						0-18' = GREAT CONTAMINATION - BLACK + HEAVY ODOUR HEAVY COBBLE TO 18'
4					GW + COBBLE	
6						
8						
10						
12						
14						
16						
18	GRB	1	-	-		<u>BTEX - PD15</u>
20					T.D. SHALE	MAXIMUM DEPTH 18' SHALE LAYER AT 18' - BROWN - NO ODOUR - NO STAIN, (LIGHT)
22					MEDIUM HARD	
24						
26	SPN	2	45	17	SHALE	53 blows/18" MOIST → DRY, DARK BROWN, FINE SHALE - NO ODOUR
28						
30	SPN	3	18	75	SHALE	50 blows/4"
32					G.W.	GROUNDWATER AT ~ 30'6"
34						
36						T.D = 35'6" - SET WELL - 10' SCREEN SAND TO 23'2" BENTONITE TO 21'2" (2 FOOT PLUG)
38						
40						
42						
44						

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8020 AROMATIC VOLATILE ORGANICS

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

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

ND - Parameter not detected at the stated detection limit.

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

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

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

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


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

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

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

ND - Parameter not detected at the stated detection limit.

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

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


Analyst


Review

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

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

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

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Well 6-6; MW-1*
Sampled by: *REO* Date: *2-Jul-96* Time: *11:40*
Analyzed by: *DC* Date: *2-Jul-96*
Sample Matrix: *Liquid*

Laboratory Analysis

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

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

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

P.O. BOX 2606 • FARMINGTON, NM 87499

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

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

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

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Well 6-6; MW-2*
Sampled by: *REO* Date: *2-Jul-96* Time: *10:50*
Analyzed by: *DC* Date: *2-Jul-96*
Sample Matrix: *Liquid*

Laboratory Analysis

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

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

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

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

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

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

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Well 6-6; MW-3*
Sampled by: *REO* Date: *2-Jul-96* Time: *11:15*
Analyzed by: *DC* Date: *2-Jul-96*
Sample Matrix: *Liquid*

Laboratory Analysis

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

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

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

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

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

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

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Well 7-#1; MW-1*
Sampled by: *REO* Date: *28-Jun-96* Time: *10:05*
Analyzed by: *DC* Date: *2-Jul-96*
Sample Matrix: *Liquid*

Laboratory Analysis

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

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

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

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

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

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

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Well 7-#1; MW-2*
Sampled by: *REO* Date: *28-Jun-96* Time: *10:25*
Analyzed by: *DC* Date: *3-Jul-96*
Sample Matrix: *Liquid*

Laboratory Analysis

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

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

Approved by: *JAC*

Date: *7/8/96*

P.O. BOX 2606 • FARMINGTON, NM 87499

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

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

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

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Well 7-#1; MW-3*
Sampled by: *REO* Date: *28-Jun-96* Time: *10:50*
Analyzed by: *DC* Date: *3-Jul-96*
Sample Matrix: *Liquid*

Laboratory Analysis

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

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

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

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

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

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

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Well 7-#1; MW-4*
Sampled by: *REO* Date: *28-Jun-96* Time: *11:15*
Analyzed by: *DC* Date: *2-Jul-96*
Sample Matrix: *Liquid*

Laboratory Analysis

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

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

Approved by: *Jag*
Date: *7/3/96*

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

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

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

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Well 7-#6; MW-1*
Sampled by: *REO* Date: *28-Jun-96* Time: *8:50*
Analyzed by: *DC* Date: *2-Jul-96*
Sample Matrix: *Liquid*

Laboratory Analysis

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

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

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

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

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

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

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Well 12-#9; MW-1*
Sampled by: *REO* Date: *28-Jun-96* Time: *9:40*
Analyzed by: *DC* Date: *3-Jul-96*
Sample Matrix: *Liquid*

Laboratory Analysis

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

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

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

P.O. BOX 2606 • FARMINGTON, NM 87499

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

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

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

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Well 12-#9; MW-2*
Sampled by: *REO* Date: *28-Jun-96* Time: *9:20*
Analyzed by: *DC* Date: *2-Jul-96*
Sample Matrix: *Liquid*

Laboratory Analysis

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

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

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



Report Number
96-192-2024

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

Midwest Laboratories, Inc.

REPORT OF ANALYSIS

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

RECEIVED "11 1 5 1996 (p)

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

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

PO/Proj. #: 4223
DUNCAN OIL

Lab number: 304734

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

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

Respectfully Submitted

Heather Ramig
Heather Ramig/Lisa Dworak
Client Services

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

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Report Number
96-192-2023

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

Midwest Laboratories, Inc.

REPORT OF ANALYSIS

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

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

PO/Proj. #: 4222
DUNCAN OIL

Lab number: 304727

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

RECEIVED .III 1 5 1996

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

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

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Account: 6833 ON SITE TECHNOLOGIES LTD
Report Number: 96-192-2023

Page: 2

REPORT OF ANALYSIS

Analysis	Level Found	Units	Detection		Analyst-Date
			Limit	Method	
Sample ID: <u>N. HOGBACK 7-6 MW-1</u>	14.1	mg/L	0.2	EPA 353.2	lmb-07/03
Nitrate nitrogen	0.09	mg/L	0.02	EPA 270.2	pmb-07/10
Selenium (total)					

Notes:

n.d. - Not Detected.

cc: Account(s) -669 DAVID COX

Respectfully Submitted

Heather Ramig/Lisa Dworak
Client Services

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

Our reports and letters are for the exclusive and confidential use of our clients and may not be reproduced in whole or in part, nor may any reference be made to the work, the results, or the company in any advertising, news release, or other public announcements without obtaining our prior written authorization.

BLAGG ENGINEERING, INC.

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

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

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

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

ND = Not Detectable at stated detection limits.

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

*Administrative Acceptance limits set at 30%.

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

Comments: Production/Separator Pit

P. E. O'Neil
Analyst

J. C. Blagg
Review

BLAGG ENGINEERING, INC.

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

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

Client:	Duncan Oil	Project #:	
Sample ID:	Center Bottom @ 5'	Date Analyzed:	7-23-96
Project Location:	North Hogback 7#1	Date Reported:	7-24-96
Laboratory Number:	TPH #1742	Sample Matrix:	Soil

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

ND = Not Detectable at stated detection limits.

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

*Administrative Acceptance limits set at 30%.

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

Comments: Production/Separator Pit

R. E. O'Neil
Analyst

J. C. Blagg
Review

BLAGG ENGINEERING, INC.

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

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

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

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

ND = Not Detectable at stated detection limits.

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

*Administrative Acceptance limits set at 30%.

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

Comments: Tank Drain Pit

R. E. O'Neil
Analyst

J. C. Blagg
Review

BLAGG ENGINEERING, INC.

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

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

Client:	Duncan Oil	Project #:	
Sample ID:	Center Bottom @ 4'	Date Analyzed:	7-23-96
Project Location:	North Hogback 7#3	Date Reported:	7-24-96
Laboratory Number:	TPH #1744	Sample Matrix:	Soil

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

ND = Not Detectable at stated detection limits.

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

*Administrative Acceptance limits set at 30%.

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

Comments: Production/Separator Pit

R. E. O'Neil
Analyst

J. C. Blagg
Review

BLAGG ENGINEERING, INC.

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

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

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

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

ND = Not Detectable at stated detection limits.

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

*Administrative Acceptance limits set at 30%.

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

Comments: Production/Separator Pit

P. E. O'Neil
Analyst

J. C. Blagg
Review

BLAGG ENGINEERING, INC.

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

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

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

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

ND = Not Detectable at stated detection limits.

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

*Administrative Acceptance limits set at 30%.

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

Comments: Tank Drain Pit

P. E. O'Neil
Analyst

J. L. Blagg
Review

BLAGG ENGINEERING, INC.

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

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

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

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

ND = Not Detectable at stated detection limits.

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

*Administrative Acceptance limits set at 30%.

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

Comments: Tank Drain Pit

R. E. O'Neil
Analyst

J. C. Blagg
Review

BLAGG ENGINEERING, INC.

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

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

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

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

ND = Not Detectable at stated detection limits.

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

*Administrative Acceptance limits set at 30%.

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

Comments: Production/Separator Pit

R. E. O'Neil
Analyst

J. C. Blagg
Review

BLAGG ENGINEERING, INC.

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

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

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

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

ND = Not Detectable at stated detection limits.

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

*Administrative Acceptance limits set at 30%.

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

Comments: Production/Separator Pit

P. E. O'Neil
Analyst

J. C. Blagg
Review

BLAGG ENGINEERING, INC.

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

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

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

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

ND = Not Detectable at stated detection limits.

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

*Administrative Acceptance limits set at 30%.

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

Comments: Production/Separator Pit

P. E. O'Neil
Analyst

J. L. Blagg
Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

**QUALITY ASSURANCE / QUALITY CONTROL
DOCUMENTATION**

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

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

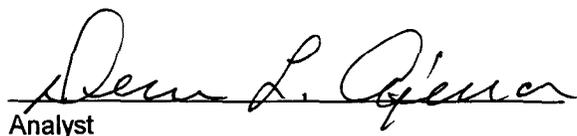
ND - Parameter not detected at the stated detection limit.

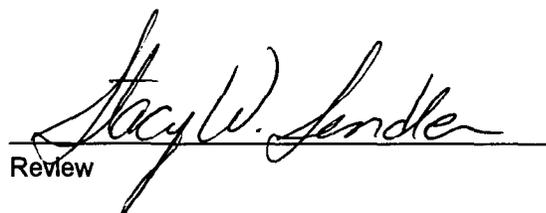
Surrogate Recoveries:	Parameter	Percent Recovery
	Trifluorotoluene	98 %
	Bromofluorobenzene	100 %

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

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

Comments: QA/QC for samples A271 - A272.


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8020 AROMATIC VOLATILE ORGANICS

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

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

ND - Parameter not detected at the stated detection limit.

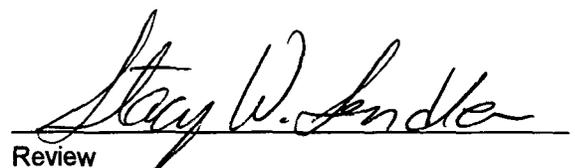
QA/QC Acceptance Criteria:	Parameter	Maximum Difference
	8020 Compounds	30 %

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

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

Comments: QA/QC for samples A271 - A272.


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8020 AROMATIC VOLATILE ORGANICS

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

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

ND - Parameter not detected at the stated detection limit.

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

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

Comments: QA/QC for samples A271 - A272.


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA Method 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

Quality Assurance Report

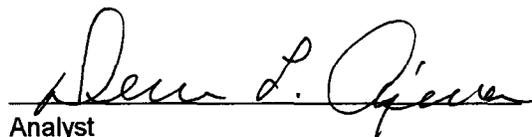
Client:	QA/QC	Project #:	N/A
Sample ID:	Laboratory Blank	Date Reported:	06-25-96
Laboratory Number:	06-25-TPH.BLANK	Date Sampled:	N/A
Sample Matrix:	Methylene Chloride	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	06-25-96
Condition:	N/A	Analysis Requested:	TPH

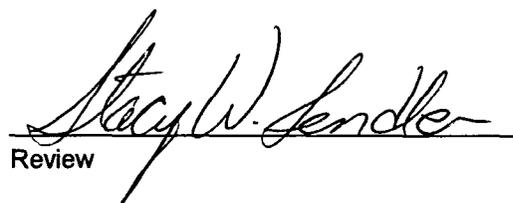
Parameter	Concentration (mg/L)	Det. Limit (mg/L)
Gasoline Range C5 - C10	ND	0.2
Diesel Range C10 - C28	ND	0.1
Total Petroleum Hydrocarbons	ND	0.2

ND - Parameter not detected at the stated detection limit.

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

Comments: QA/QC for samples A271 - A272.


Analyst


Review

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

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

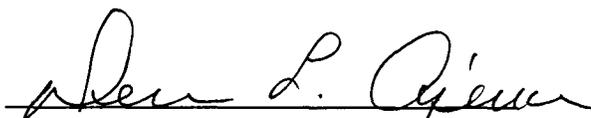
Parameter	Sample Result (mg/Kg)	Duplicate Result (mg/Kg)	Percent Difference
Gasoline Range (C5 - C10)	ND	ND	0.0%
Diesel Range (C10 - C28)	1.4	1.3	2.8%
Total Petroleum Hydrocarbons	1.4	1.3	2.8%

ND - Parameter not detected at the stated detection limit.

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

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

Comments: QA/QC for samples A271 - A272.


Analyst


Review

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

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

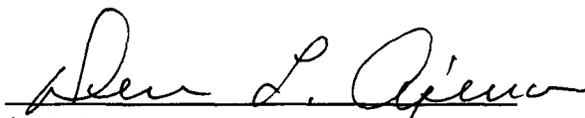
Parameter	Sample Result (mg/kg)	Spike Added (mg/kg)	Spiked Sample Result (mg/kg)	Det. Limit (mg/kg)	Percent Recovery
Gasoline Range (C5 - C10)	ND	250	249	0.2	100%
Diesel Range (C10 - C28)	1.4	250	251	0.1	100%
Total Petroleum Hydrocarbons	1.4	500	500	0.2	100%

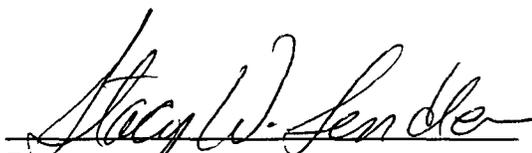
ND - Parameter not detected at the stated detection limit.

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

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

Comments: QA/QC for samples A271 - A272.


Analyst


Review

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

QUALITY ASSURANCE REPORT for EPA Method 8020

Date Analyzed: 2-Jul-96

Internal QC No.: 0444-STD
Surrogate QC No.: 0445-STD
Reference Standard QC No.: 0355-STD

Method Blank

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

Calibration Check

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

Matrix Spike

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

Surrogate Recoveries

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

S1: Fluorobenzene

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

QUALITY ASSURANCE REPORT for EPA Method 8020

Date Analyzed: 3-Jul-96

Internal QC No.: 0444-STD
Surrogate QC No.: 0445-STD
Reference Standard QC No.: 0355-STD

Method Blank

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

Calibration Check

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

Matrix Spike

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

Surrogate Recoveries

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

S1: Fluorobenzene

ON SITE

OFF: (505) 325-5667

LAB: (505) 325-1556

TECHNOLOGIES, LTD.

QUALITY ASSURANCE REPORT for EPA Method 8020

Date Analyzed: 2-Jul-96

Internal QC No.: 0444-STD
Surrogate QC No.: 0445-STD
Reference Standard QC No.: 0355-STD

Method Blank

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

Calibration Check

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

Matrix Spike

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

Surrogate Recoveries

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

S1: Fluorobenzene



CHAIN OF CUSTODY RECORD

4223

TECHNOLOGIES, LTD.

657 W. Maple • P. O. Box 2606 • Farmington NIM 87499
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Date: 7-2-76

Page 1 of 1

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Sampling Location:		City, State, Zip		Telephone No.		Telefax No.	
Sampler:		ANALYSIS REQUESTED		RESULTS TO		RESULTS TO	
MUSTY A GRACK 6-6		Number of Containers		REPORT		REPORT	
SAMPLER IDENTIFICATION		DATE		SAMPLE TIME		MATRIX	
1110-1		7-2-76		11:00		PRES.	
1110-2		7-2-76		11:00		PRES.	
1110-3		7-2-76		11:00		PRES.	
Relinquished by:		Date/Time		Date/Time		Date/Time	
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Method of Shipment:		Rush		24-48 Hours		10 Working Days	
Authorized by:		Date		Special Instructions:		Special Instructions:	

BLAGG ENGINEERING, INC.

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

BLAGG ENGINEERING, INC.
NEW MEXICO

83 JUN 11 AM 8 52

December 18, 1995

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

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

Dear Mr. Walker:

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

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

Additional Evaluation of Hydrocarbon Impacts

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

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

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

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

The initial groundwater sample collected from the well will be submitted for testing of volatile hydrocarbons using U.S. EPA Method 8020, API water analysis for cations/anions and total dissolved solids, nitrates (NO₃) and selenium. Future samples collected from the well will only include analyses for those constituents identified in excess of applicable water quality standards during the initial water testing.

Implementation of In-Situ Reclamation

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

Groundwater at the monitor wells placed at the #7-1, #12-9 and the proposed well at #7-6 will be sampled quarterly during the first year of remediation. Initial water testing will include U.S. EPA Method 8020, API water analysis for cations/anions and total dissolved solids, nitrates (NO₃) and selenium. Future samples will only include analyses for those constituents identified in excess of applicable water quality standards during the initial water testing. Note that annual water testing may be indicated.

Evaluation of Remediation and Assessment Program

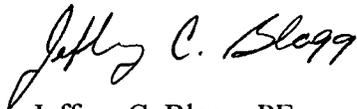
Following well installation and sampling at the #7-6 separator pit location the effectiveness of the test program will be evaluated. Lithology types and thickness, groundwater depth and water quality will be known. Risk assessment of potential impacts at other earthen pit locations can be determined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

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

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

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

Respectfully,
Blagg Engineering, Inc.



Jeffrey C. Blagg, PE
President

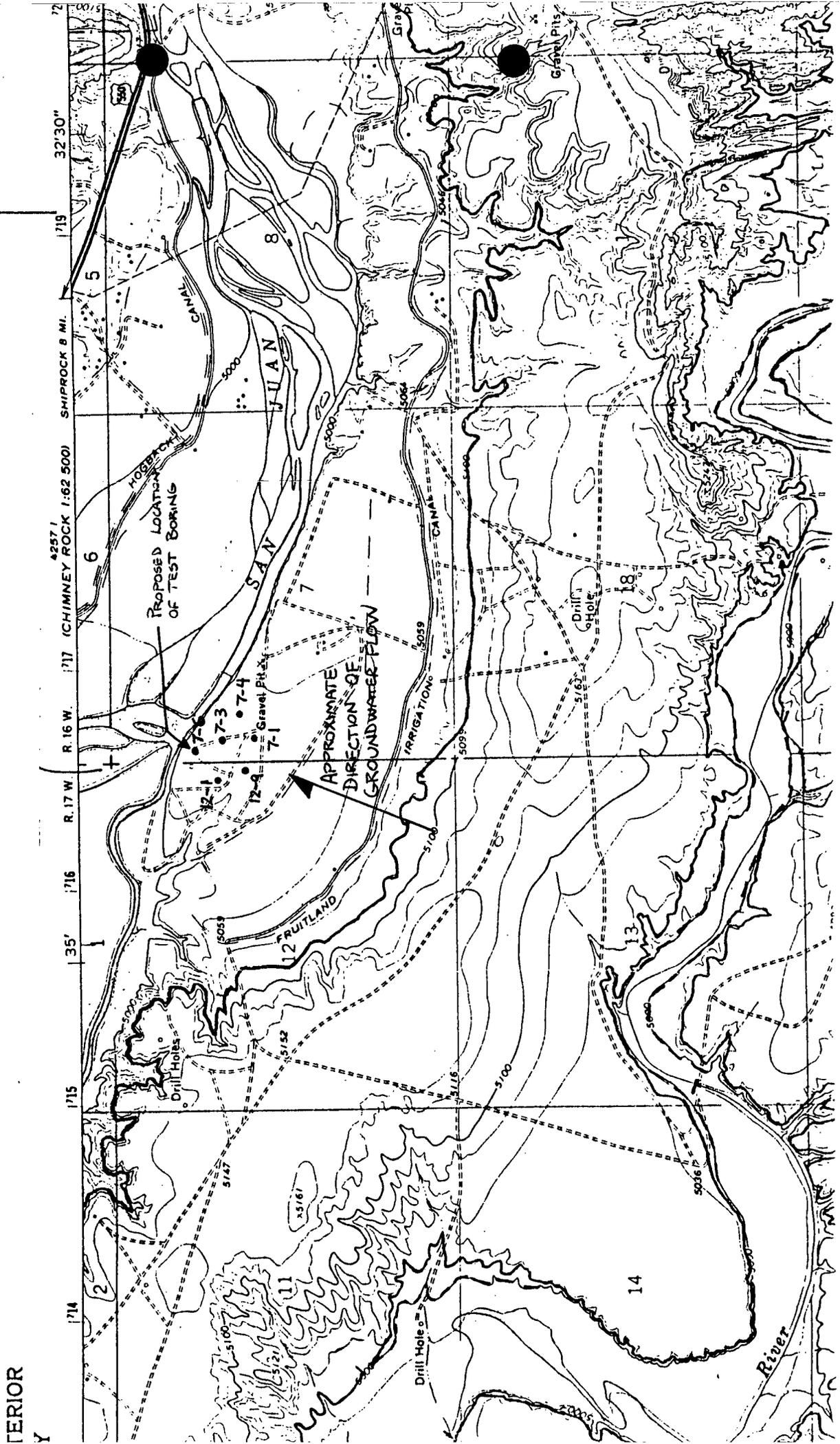
JCB

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

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

FIGURE 1

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



BLAGG ENGINEERING, INC.

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

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

September 14, 1995

RECEIVED

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

OCT 2 1995
Environmental Bureau
Oil Conservation Division

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

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

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

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

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

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

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

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

Respectfully,
Blagg Engineering, Inc.



Jeffrey C. Blagg, PE
President

JCB

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

BLAGG ENGINEERING, INC.

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

September 14, 1995

RECEIVED

OCT 2 1995

Mr. John Bettridge
Duncan Oil, Inc.
1777 South Harrison Street - Penthouse One
Denver, Colorado 80210 - 3925

Environmental Bureau
Oil Conservation Division

Re: Initial Pit Assessment Results & Recommended Remediation Program
Unlined Surface Impoundments at PxA Well Locations
Duncan Oil, Inc. North Hogback Unit - Navajo Tribal Lands

Dear Mr. Bettridge:

Blagg Engineering, Inc. (BEI) is pleased to submit initial pit assessment results and recommendations for remediation of unlined surface impoundments at the Duncan Oil, Inc. North Hogback Unit. Initial assessment of 10 pits located at the abandoned unit were conducted pursuant to the Pit Closure Plan submitted by Dugan Production Company and BEI on March 23, 1995. This closure plan was approved by the Navajo Nation EPA with letter dated April 25, 1995, by the U.S. Bureau of Land Management with letter dated May 31, 1995 and by the New Mexico Oil Conservation Division with letter dated May 22, 1995.

The pit assessment investigation was initiated on June 13, 1995. Regulatory agencies, including the Navajo EPA, U.S. BLM and the Bureau of Indian Affairs were provided 48 hours advanced notice of intent to begin pit assessment work. Mr. James Walker of the Navajo EPA was present to observe excavation and testing activities on the mornings of June 13 - 14, during which a total of 10 pits on 7 separate PxA well locations were identified and assessed. The PxA well locations and pits were labelled as follows:

<u>PxA Well Location</u>	<u>Pit Identification</u>
North Hogback #6-6	1 Production (separator) Pit
North Hogback #7-1	1 Production (separator) Pit 1 Tank Drain Pit
North Hogback #7-3	1 Production (separator) Pit
North Hogback #7-4	1 Production (separator) Pit
North Hogback #7-6	1 Production (separator) Pit 2 Tank Drain Pits
North Hogback #12-1	1 Production (separator) Pit

North Hogback #12-6

No Pits Present

North Hogback #12-9

1 Production (separator) Pit

Note that the prior closure plan submittal and BLM Sundry Notices identified one production pit at each of the PxA well locations listed above. During assessment activities, one previously missed tank drain pit was found at the North Hogback #7-1 location and two previously missed tank drain pits were found at the North Hogback #7-6 location. Additionally, there were no pits associated with the North Hogback #12-6 location.

The Navajo Nation EPA set a closure standard of 100 ppm total petroleum hydrocarbons (TPH) at all of the North Hogback pits due to the proximity of the San Juan River.

ASSESSMENT METHODOLOGY

Each of the unlined surface impoundments located in the Section 7 and Section 12 leases were evaluated using a backhoe. These pits are found in a rural area south of the San Juan River with the nearest residence located more than 1/2 mile to the east. The soil lithology at the pits, beginning from the ground surface and extending to the total reach of the backhoe of approximately 15 feet, was found to be cobbles and boulders with diameters of up to 2.5 feet. Soil samples were collected for testing by the field headspace method using an organic vapor meter, and for TPH testing using USEPA Method 418.1. Additionally, at certain pit locations groundwater was encountered and water samples were collected from the open excavations for laboratory testing by USEPA Method 8020 for BTEX. Groundwater monitor wells were installed in some of these open excavations prior to backfilling to facilitate water quality testing and gradient determination. Following assessment all of the pits were backfilled and contoured to approximately match their original depression size and shape.

The unlined surface impoundment at the North Hogback #6-6 site is isolated from the remaining pits in the closure program and it is the only site located north of the San Juan River. The #6-6 pit is found in a rural residential area and is surrounded with cultivated crops. Due to this active farming and the need to minimize surface disturbance, this pit was assessed using a mobile pickup mounted EarthProbe auger rig. Soil borings were advanced immediately adjacent to and surrounding the perimeter of the pit and evaluated for hydrocarbon content using the field headspace method. Additionally, certain samples were tested for TPH content pursuant to USEPA Method 418.1. Groundwater was encountered at a depth of approximately 14 feet below ground surface at this site and three groundwater monitor wells were set for water quality testing and determination of gradient. These wells were sampled and tested for BTEX content on July 3, 1995.

PIT ASSESSMENT RESULTS

Discussion of assessment results for each of the 10 unlined surface impoundments included in the closure program are presented below. Field Reports including site plans, laboratory data sheets and other field data is included separately as an attachment to this report.

North Hogback #6-6 Separator Pit

A total of 8 test holes were drilled with a pickup mounted EarthProbe mobile drill unit using a 2-inch diameter auger. Test holes were placed immediately adjacent to and around the separator pit. Adjacent to the pit, black hydrocarbon contaminated soil with a strong odor was found beginning at a depth of 5 feet below ground surface and extending to a depth of 14 feet below ground surface. Test hole TH1, located on the northeast edge of the pit, tested a TPH value of 1,900 parts per million (ppm) at a depth of 10 feet below ground surface. Test hole TH8, located approximately 80 feet northeast of the pit, registered a TPH value of 62 ppm at 13 feet below ground surface. The applicable regulatory standard for TPH at this site is 100 ppm. Test hole TH6 located 20 feet east of the pit, and test holes TH4 and TH5, located between 33 feet and 42 feet southwest of the pit, presented no odor or stain of contamination, with field headspace values all below 12 ppm.

The soil lithology from the ground surface to a depth of approximately 15 feet was a sand to clay mixture. Boulders and/or cobbles were encountered at the 15 foot depth below ground surface and drill holes could not be advanced below this depth. Groundwater was found at depths ranging from 13 to 15 feet below ground surface.

Groundwater monitor wells were placed in test holes TH7 (MW#1), TH5(MW#2) and TH8(MW#3). These wells were sampled on July 3, 1995 and submitted for laboratory determination of benzene, toluene, ethylbenzene and total xylenes (BTEX) by USEPA Method 8020. Laboratory analytical results on the water samples were as follows:

Table 1
Groundwater Quality
Duncan Oil, Inc. North Hogback Well #6-6 Separator Pit
July 3, 1995

Monitor Well	Benzene ug/L or ppb	Toluene ug/L or ppb	Ethylbenzene ug/L or ppb	Total Xylenes ug/L or ppb
MW#1	1.8	0.9	1	4.6
MW#2	ND	ND	ND	0.4
MW#3	4.8	7.8	2.9	14.6
Allowable Limit	10	750	750	620

ND = below laboratory detection limits

As indicated in Table 1, none of the groundwater samples collected from the North Hogback #6-6 location were in excess of water quality standards for any of the BTEX constituents. Although soil impacts immediately adjacent to the pit were in excess of allowable standards, groundwater impacts appear to be minimal. Blagg Engineering, Inc. has observed similar minimal groundwater impacts at other locations where low gravity oils, as those associated with the North Hogback Unit, are encountered.

The groundwater gradient was determined by surveying well tops and measuring the static depth to water in each of the three groundwater monitor wells. Water level measurements indicate that groundwater is flowing towards the northwest.

North Hogback #7-1 Separator Pit

The assessment at the North Hogback #7-1 location was conducted with a backhoe due to the presence of large cobbles and boulders beginning at the ground surface and extending to the total 15 feet reach of the backhoe. The separator pit bottom contained black stained soils with a strong odor. This contamination extended to the total depth of the hole of 10 feet, where groundwater was encountered. Three additional test pits were dug around the separator pit, with one hole dug to the south and two holes to the north, to determine the extent of contamination migration. There was no contamination apparent approximately 15 feet south of the pit. One test hole dug 10 feet north of the pit encountered contamination immediately above the water table at 10 feet below ground surface, and another test hole dug 25 feet north east of the pit indicated minimal to no contamination. No TPH tests were run on the soil samples.

Water samples were collected from the open test holes within the separator pit, to the north and to the south. These samples were submitted for laboratory determination of BTEX, with results as follows:

Table 2
Groundwater Quality
Duncan Oil, Inc. North Hogback Well #7-1 Separator Pit
Water Samples Collected From Open Test Holes
June 14, 1995

Test Hole	Benzene ug/L or ppb	Toluene ug/L or ppb	Ethylbenzene ug/L or ppb	Total Xylenes ug/L or ppb
TH1, in sep. pit	18.3	309.4	113	168.8
TH3, 15' S of pit	ND	ND	ND	ND
TH4, 25' NE of pit	0.9	3.9	0.9	3.8
Allowable Limit	10	750	750	620

ND = below laboratory detection limits

Due to indications of benzene levels above water quality standards, additional testing was performed at this site. Groundwater monitoring wells were placed in TH3 (identified as monitor well MW#1, located south of the separator pit) and TH1 (identified as monitor well MW#2, located within the separator pit) during backfill operations. Monitor well MW#2 was subsequently sampled on July 3, 1995 with test results as indicated in Table 3:

Table 3
Groundwater Quality
Duncan Oil, Inc. North Hogback Well #7-1 Separator Pit
July 3, 1995

Monitor Well	Benzene ug/L or ppb	Toluene ug/L or ppb	Ethylbenzene ug/L or ppb	Total Xylenes ug/L or ppb
MW#2	7.5	13.6	83.9	493.6
Allowable Limit	10	750	750	620

ND = below laboratory detection limits

Benzene in monitor well MW#2 (placed in test hole TH1) was found to test below water quality standards. Original sampling in the open pit may have tested high due to sampling methodology in the open pit. Monitor well MW#1 was not sampled due to non-detect results of the original test hole TH3 water sampling.

Water sample test results for this site indicate that groundwater has had minimal impact. A survey of relative groundwater elevations for monitor wells placed at this and adjacent pits indicates that groundwater is flowing in a northeast direction.

North Hogback #7-1 Tank Pit

At the North Hogback #7-1 location there is a tank pit located approximately 40 feet north of the separator pit. In test hole TH1 located in the tank pit, black, contaminated soil with a strong odor was present from the pit bottom and extending to a depth of approximately 13 feet, where groundwater was encountered. Additional test holes were dug with TH2 at 25 feet north of the tank pit (odor and soil staining between 10 -11 feet below ground surface), TH3 at 60 feet north of the tank pit (no odor or staining) and TH4 at 20 feet west of the tank pit (no odor or staining). Groundwater was encountered in all the test holes and water samples were collected from TH1, TH3 and TH4 and submitted for laboratory determination of BTEX. Results were as follows:

Table 4
 Groundwater Quality
 Duncan Oil, Inc. North Hogback Well #7-1 Tank Pit
 Water Samples Collected From Open Test Holes
 June 14, 1995

Test Hole	Benzene ug/L or ppb	Toluene ug/L or ppb	Ethylbenzene ug/L or ppb	Total Xylenes ug/L or ppb
TH1, in tank pit	1.1	8.9	4.05	372.3
TH3, 60' N of pit	ND	ND	ND	ND
TH4, 20" W of pit	ND	ND	ND	ND
Allowable Limit	10	750	750	620

ND = below laboratory detection limits

Groundwater monitoring wells were placed in TH1 (identified as monitor well MW#3, located in the tank pit) and TH4 (identified as monitor well MW#4, located approximately 60 feet north of the tank pit) during backfill operations. Monitor well MW#3 was subsequently sampled on July 3, 1995 with test results as indicated in Table 5:

Table 5
 Groundwater Quality
 Duncan Oil, Inc. North Hogback Well #7-1 Tank Pit
 July 3, 1995

Monitor Well	Benzene ug/L or ppb	Toluene ug/L or ppb	Ethylbenzene ug/L or ppb	Total Xylenes ug/L or ppb
MW#3	ND	13.1	39.4	292.2
Allowable Limit	10	750	750	620

ND = below laboratory detection limits

Monitor well MW#4 was not sampled due to non-detect results of the original test hole TH4 water sampling.

Water sample test results for this site indicate that groundwater has had minimal impact. A survey of relative groundwater elevations for monitor wells placed at this and adjacent pits indicates that groundwater is flowing in a northeast direction.

North Hogback #7-3 Separator Pit

A single test hole was excavated with a backhoe in the North Hogback #7-3 separator pit. Lithology was cobbles and boulders extending from the pit surface to the total reach of the backhoe of 15 feet below ground surface. Gross hydrocarbon contamination with a strong odor was encountered in the entire interval. A TPH was run on a soil sample collected at the base of the hole with test results of 17,200 ppm. Note that the closure standard for this site is 100 ppm.

The excavation equipment was not capable of extending the investigation to a deeper depth and the hole was backfilled and contoured to its approximate original condition. No groundwater was encountered.

North Hogback #7-4 Separator Pit

A single test hole was excavated with a backhoe in the North Hogback #7-4 separator pit. Lithology was cobbles and boulders extending from the pit surface to the total reach of the backhoe of 15 feet below ground surface. Gross hydrocarbon contamination with a strong odor was encountered in the entire interval. A TPH was run on a soil sample collected at the base of the hole with test results of 8,800 ppm. The closure standard for this site is 100 ppm.

The excavation equipment was not capable of extending the investigation to a deeper depth and the hole was backfilled and contoured to its approximate original condition. No groundwater was encountered.

North Hogback #7-6 Separator Pit

A single test hole was excavated with a backhoe in the North Hogback #7-6 separator pit. Lithology was cobbles and boulders extending from the pit surface to the total reach of the backhoe of 12 feet below ground surface. Gross hydrocarbon contamination with a strong odor was encountered in the entire interval. A TPH was run on a soil sample collected at the base of the hole with test results of 15,200 ppm. Again, the closure standard for this site is 100 ppm.

The excavation equipment was not capable of extending the investigation to a deeper depth and the hole was backfilled and contoured to its approximate original condition. No groundwater was encountered.

North Hogback #7-6 Tank Pit (North)

The North Hogback #7-6 location was found to have 2 tank pits in addition to a single separator pit. The tanks pits were labelled by Blagg Engineering as the North pit and the South pit and they were likely associated with the Section 12 lease.

A single test hole was excavated with a backhoe in the North Hogback #7-6 tank pit (North). Lithology was cobbles and boulders extending from the pit surface to the total reach of the backhoe of 14 feet below ground surface. Gross hydrocarbon contamination with a strong odor was encountered in the entire interval. A TPH was run on a soil sample collected at the base of the hole with test results of 12,700 ppm. Again, the closure standard for this site is 100 ppm.

The excavation equipment was not capable of extending the investigation to a deeper depth and the hole was backfilled and contoured to its approximate original condition. No groundwater was encountered.

North Hogback #7-6 Tank Pit (South)

A single test hole was excavated with a backhoe in the North Hogback #7-6 tank pit (South). Lithology was cobbles and boulders extending from the pit surface to the total reach of the backhoe of 14 feet below ground surface. Gross hydrocarbon contamination with a strong odor was encountered in the entire interval. No TPH samples were run on this pit, but it is estimated that a value in excess of 10,000 ppm would be likely based on samples run in similar contamination on other nearby pits.

The excavation equipment was not capable of extending the investigation to a deeper depth and the hole was backfilled and contoured to its approximate original condition. No groundwater was encountered.

North Hogback #12-1 Separator Pit

A single test hole was excavated with a backhoe in the North Hogback #12-1 separator pit. Lithology was cobbles and boulders extending from the pit surface to the total reach of the backhoe of 15 feet below ground surface. Gross hydrocarbon contamination with a strong odor was encountered in the entire interval. A TPH was run on a soil sample collected at the base of the hole with test results of 4,200 ppm. As with all locations in the North Hogback Unit, the closure standard for this site is 100 ppm.

The excavation equipment was not capable of extending the investigation to a deeper depth and the hole was backfilled and contoured to its approximate original condition. No groundwater was encountered.

North Hogback #12-9 Separator Pit

The assessment at the North Hogback #12-9 location was conducted with a backhoe. The separator pit bottom contained black stained soils with a strong odor. This contamination extended to a depth of 11 feet, where groundwater was encountered. Four additional test pits were dug around the separator pit, with one hole dug to the west and three holes to the north, to determine the extent of

contamination migration. Test hole TH2 to the west did not encounter soil contamination at a distance of 15 feet from the west boundary of the separator pit. Test hole TH3 (20 feet north of the separator pit), test hole TH4 (40 feet north of the separator pit) and test hole TH5, (60 feet north of the separator pit) all indicated light hydrocarbon staining and odor immediately above the water table surface, located approximately 8 - 9 feet below ground surface. No TPH tests were run on the soil samples.

Water samples were collected from the open test holes within the separator pit (TH1), to the west (TH2) and to the south (TH5). These samples were submitted for laboratory determination of BTEX, with results as follows:

Table 6
Groundwater Quality
Duncan Oil, Inc. North Hogback Well #12-9 Separator Pit
Water Samples Collected From Open Test Holes
June 14, 1995

Test Hole	Benzene ug/L or ppb	Toluene ug/L or ppb	Ethylbenzene ug/L or ppb	Total Xylenes ug/L or ppb
TH1, in sep. pit	1.1	7.7	2.5	7.8
TH2, 15' W of pit	ND	ND	ND	ND
TH5, 60' N of pit	ND	ND	ND	ND
Allowable Limit	10	750	750	620

ND = below laboratory detection limits

Groundwater monitoring wells were placed in TH1 (identified as monitor well MW#1, located in the separator pit) and TH5 (identified as monitor well MW#2, approximately 60 feet north of the separator pit) during backfill operations. Monitor well MW#1 was subsequently sampled on July 3, 1995 with test results as indicated in Table 7:

Table 7
Groundwater Quality
Duncan Oil, Inc. North Hogback Well #12-9 Separator Pit
July 3, 1995

Monitor Well	Benzene ug/L or ppb	Toluene ug/L or ppb	Ethylbenzene ug/L or ppb	Total Xylenes ug/L or ppb
MW#1	ND	4.4	ND	29.5
Allowable Limit	10	750	750	620

ND = below laboratory detection limits

Monitor well MW#2 was not sampled due to non-detect results of the original test hole TH5 water sampling.

Water sample test results for this site indicate that groundwater has had minimal impact. A survey of relative groundwater elevations for monitor wells placed at this and adjacent pits indicates that groundwater is flowing in a northeast direction.

PIT ASSESSMENT SUMMARY

Each of the 10 unlined surface impoundments at the North Hogback Unit evaluated by Blagg Engineering, Inc. indicated soil contamination was present in excess of allowable standards. Test holes advanced around pits determined that the areal extent of contamination to be limited, and that contamination appears to advance vertically. No thick clays, shales or bedrocks were encountered to prevent vertical migration or cause horizontal spreading. Where groundwater was encountered, soil contamination appeared to travel in the down-gradient direction of the water table surface. This is a normally expected occurrence.

Due to equipment limitations and extreme subsurface conditions of large cobbles and boulders, the vertical extent of soil contamination at the #7-3 (separator pit), #7-4 (separator pit), #7-6 (one separator and two tank pits), and #12-1 (separator pit) could not be determined.

Although soil contamination was found outside of allowable limits at locations where groundwater was encountered, there was limited impact on water quality. A total of 15 separate water samples were collected and submitted for BTEX analysis during the investigation. Only the sample from the Well #7-1 test hole excavation in the separator pit indicated contamination in excess of standards, with a value of 18.3 ppb benzene. A groundwater monitor well subsequently placed in this test pit and sampled for BTEX analysis indicated a benzene concentration of 7.5 ppb. The regulatory standard for benzene is 10 ppb. The sample collected from within the monitor well is believed to be representative of actual water quality and shows benzene to be within regulatory standards.

RECOMMENDED REMEDIATION PROGRAM

Treatment of groundwater is neither recommended or required at the North Hogback Unit since no groundwater contamination in excess of regulatory limits was found. Treatment of soil is required to meet regulatory standards. Blagg Engineering, Inc. recommends an in-situ treatment program to enhance microbial activity for natural bio-degradation of hydrocarbons. A program including application of fresh water mixed with nutrients (common fertilizer) can be expected to accelerate the natural bioremediation process.

The initial recommended treatment program is quarterly stimulation of each of the unlined surface impoundments at the North Hogback Unit using 10 barrels of fresh water mixed with common nutrients. It is recommended to evaluate the effectiveness of this program to determine if a change in the volume or frequency of stimulation may be necessary. A pre-treatment sampling of each pit

bottom with analysis of TPH by USEPA Method 418.1 should be performed, followed by annual pit bottom sampling and analysis by the same method. If hydrocarbon decay rates indicate probable decline to acceptable regulatory standards, no changes in the remediation program will be initiated. If hydrocarbon decay rates indicate standards will not be achieved, alternate bioremediation processes should be investigated.

Final closure of a pit will not be conducted until laboratory analyses of soil samples for TPH and BTEX meet regulatory standards.

Please contact Blagg Engineering, Inc. at (505)632-1199 for additional information or clarification.

Respectfully submitted,
Blagg Engineering, Inc.



Jeffrey C. Blagg, PE
President



JCB/

Attachments: Field reports & analytical data results for each pit

NORTH HOGBACK #6-6

SEPARATOR PIT

FIELD REPORTS & ANALYTICAL RESULTS

CLIENT: Duncan Oil

BLAGG ENGINEERING, INC.

P.O. BOX 87, BLOOMFIELD, NM 87413
(505) 632-1199

PIT NO: _____

C.D.C. NO: _____

FIELD REPORT: SITE ASSESSMENT

JOB No: _____

PAGE No: 1 of 2

PROJECT: PIT ASSESSMENT

CONTRACTOR: BLAGG ENGINEERING

EQUIPMENT USED: GEO PROBE/OVM/TPH UNIT

DATE STARTED: 6-14-95

DATE FINISHED: _____

ENVIRO. SPCLT: JCB

OPERATOR: BLAGG

LOCATION: NAME: NORTH HOGBACK SEC 6 WELL # 6 PIT: PRODUCTION (SEPARATOR)
QUAD/UNIT: SEC: 6 TWP: 29N RNG: 16W PM: NM CNTY: SJ ST: NM

LAND USE: PRIVATE FARM LEASE #: _____

SURFACE CONDITIONS: DRY SOIL - CULTIVATED CROP

FIELD NOTES & REMARKS: PIT IS LOCATED APPROXIMATELY 300 FEET NE OF WELLHEAD.

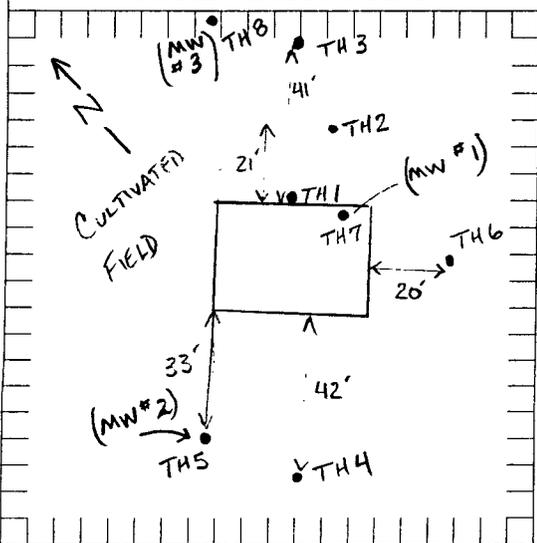
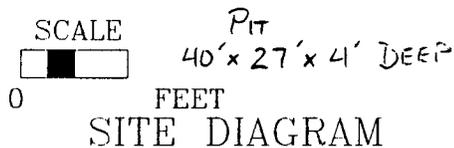
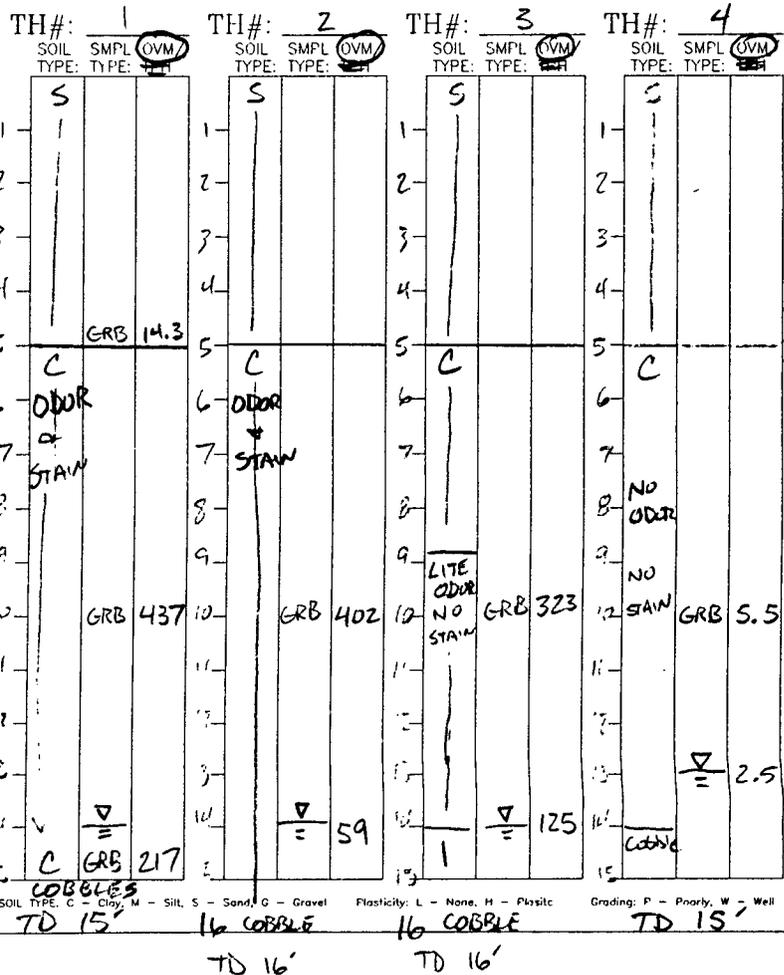
DEPTH TO G.W.: 14' NEAREST WATER SOURCE: < 500' NEAREST SURFACE WATER < 500'

RANKING SCORE: 20 CLOSURE STD: 100 ppm

SAMPLE INVENTORY		
SMPL ID:	SMPL TYPE:	LABORATORY ANALYSIS:
TH#1@10'	GRB	TPH <u>1,864</u>
TH#8@13'	GRB	TPH <u>62</u>

NOTE: WELLHEAD HAS BEEN REMOVED & NO MARKER PLACED, TO FACILITATE FARMING.

TEST HOLE LOGS:



CLIENT: _____

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

LOCATION NO: _____

FIELD REPORT: SITE ASSESSMENT

PAGE No: 2 of 2

PROJECT: PIT ASSESSMENT
CONTRACTOR: BLAGG ENGINEERING

DATE STARTED: 6-14-95
DATE FINISHED: _____

LOCATION: NAME: N HOGBACK SEC 6 WELL # 6 PIT: PRODUCTION
QUAD/UNIT: _____ SEC: 6 TWP: 29N RNG: 16W PM: NM CNTY: SS ST: NM

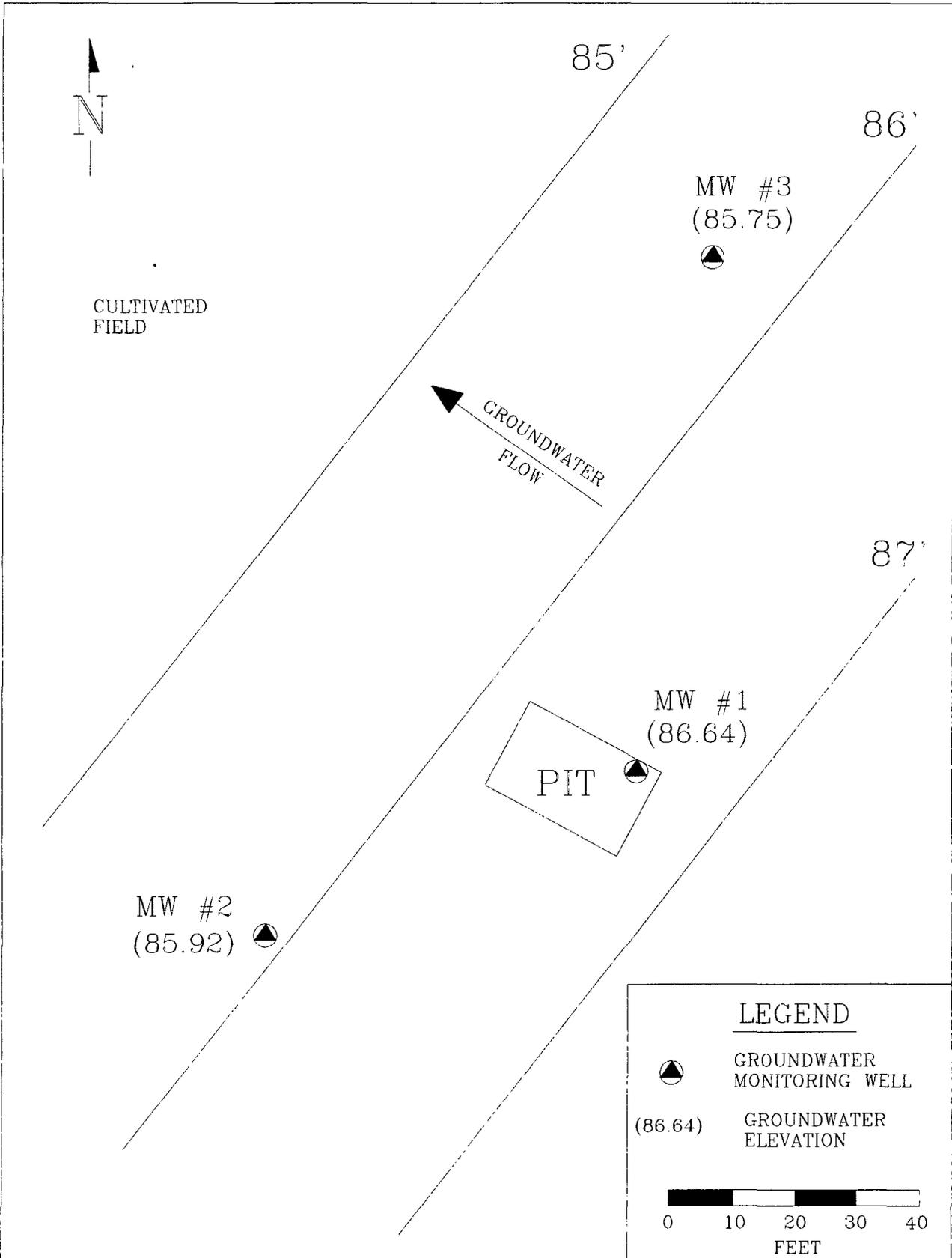
FIELD NOTES & REMARKS:

(mw #1) (mw #3)
TEST HOLE LOGS

TH# 5 (mw #2)			TH# 6			TH# 7 (mw #1)			TH# 8 (mw #3)			TH#			TH#		
SOIL TYPE	SMPL TYPE	OVM/TPH	SOIL TYPE	SMPL TYPE	OVM/TPH	SOIL TYPE	SMPL TYPE	OVM/TPH	SOIL TYPE	SMPL TYPE	OVM/TPH	SOIL TYPE	SMPL TYPE	OVM/TPH	SOIL TYPE	SMPL TYPE	OVM/TPH
1	S		1	S		1	S		1	S							
2			2			2			2								
3			3			3			3								
4			4			4			4								
5			5			5	C		5	C							
6			6			6			6								
7			7			7			7								
8			8			8			8								
9			9			9			9								
10			10			10			10								
11			11			11			11								
12			12			12			12								
13			13			13			13								
14			14			14			14								
15			15			15			15								

TH# 5: SOIL TYPE: S, SMPL TYPE: [blank], OVM/TPH: [blank]. GRB 2.0, GRB 12.0. LITE STAIN. TD 15'.
 TH# 6: SOIL TYPE: S, SMPL TYPE: [blank], OVM/TPH: [blank]. GRB 0.4, GRB 0.0. NO ODOR, NO STAIN. TD 15'.
 TH# 7: SOIL TYPE: S, SMPL TYPE: [blank], OVM/TPH: [blank]. BLACK STREAKS, NO ODOR. NONE ANALYZED. TD 15'.
 TH# 8: SOIL TYPE: S, SMPL TYPE: [blank], OVM/TPH: [blank]. NO ODOR, NO STAIN. GRB 2.6. TD 15'.
 TH# 9: SOIL TYPE: [blank], SMPL TYPE: [blank], OVM/TPH: [blank].
 TH# 10: SOIL TYPE: [blank], SMPL TYPE: [blank], OVM/TPH: [blank].

SOIL TYPE: C - Clay, M - Silt, S - Sand, G - Gravel
 Plasticity: L - None, H - Plastic
 Grading: P - Poorly, W - Well



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

DUNCAN ENERGY COMPANY

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

SITE
DIAGRAM

SHEET: A1	DRWN: JULY 95
DRWN BY: REO	REV:
REV BY:	PR. MGR: JCB

BLAGG ENGINEERING, INC.

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

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

Client:	Duncan Oil	Project #:	
Sample ID:	TH1 @ 10'	Date Analyzed:	6-15-95
Project Location:	North Hogback 6 #6	Date Reported:	6-20-95
Laboratory Number:	TPH-1537	Sample Matrix:	Soil

Parameter	Result, mg/kg	Detection Limit, mg/kg
Total Recoverable Petroleum Hydrocarbons	1,900	100

ND = Not Detectable at stated detection limits.

QA/QC:	QA/QC Sample TPH mg/kg	Duplicate TPH mg/kg	% *Diff.
	1,248	1,224	2

*Administrative Acceptance limits set at 30%.

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

Comments: Production Pit

J. C. Blagg
Analyst

R. E. O'Neil
Review

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

FIELD MODIFIED EPA METHOD 418.1
TOTAL PETROLEUM HYDROCARBONS

Client:	Duncan Oil	Project #:	
Sample ID:	TH8 @ 13'	Date Analyzed:	6-30-95
Project Location:	North Hogback 6 #6	Date Reported:	6-30-95
Laboratory Number:	TPH-1538	Sample Matrix:	Soil

Parameter	Result, mg/kg	Detection Limit, mg/kg
Total Recoverable Petroleum Hydrocarbons	62	10

ND = Not Detectable at stated detection limits.

QA/QC:	QA/QC Sample TPH mg/kg	Duplicate TPH mg/kg	% *Diff.
	1,248	1,224	2

*Administrative Acceptance limits set at 30%.

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

Comments: Production Pit

J. C. Blagg
Analyst

Nelson Velz
Review



CHAIN OF CUSTODY RECORD

3127

Page 1 of 1

Date: 7-3-95

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

Purchase Order No.:		Job No. <u>DUNCAW OIL</u>		Name <u>JEFF BLAGE</u>		Title	
Company <u>BLAGE ENGINEERING</u>		Dept.		Company <u>SAME</u>			
Address <u>P.O. BOX 87</u>				Mailing Address			
City, State, Zip <u>Bloomfield NM 87413</u>				City, State, Zip		Telephone No. <u>632-1194</u> Telefax No. <u>632-3903</u>	
Sampling Location: <u>NORTH HOGBACK LOCATIONS</u>				ANALYSIS REQUESTED			
Sampler: <u>R. E. O'NEILL</u>							
SEND INVOICE TO	SAMPLE IDENTIFICATION	SAMPLE		MATRIX	PRES.	Number of Containers	LAB ID
		DATE	TIME				
	WELL 6-6, MW #1	7-3	0840	WATER	14/12	2 ✓	7117-3127
	WELL 6-6, MW #2	7-3	0857	"	"	2 ✓	7118
	WELL 6-6, MW #3	7-3	0917	"	"	2 ✓	7119
	WELL 12-9, MW #1	7-3	1133	"	"	2 ✓	7120
	WELL 7-1, MW #2	7-3	1040	"	"	2 ✓	7121
	WELL 7-1, MW #3	7-3	1050	"	"	2 ✓	7127
Relinquished by: <u>R. E. O'NEILL</u>		Date/Time <u>7-3 1245</u>	Received by: <u>J. H.</u> Date/Time <u>7/3/95 1745</u>				
Relinquished by:		Date/Time	Received by:				
Relinquished by:		Date/Time	Received by:				
Method of Shipment:		Rush		24-48 Hours		10 Working Days	
Authorized by: <u>R. E. O'NEILL</u>		Date <u>7-3-95</u>		Special Instructions:			



OFF: (505) 325-8786

LAB: (505) 325-5667

AROMATIC VOLATILE ORGANICS

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

Date: *7/5/95*
COC No.: *3127*
Sample No. *7117*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Locations*
Project Location: *Well 6-6, MW#1*
Sampled by: *REO* Date: *7/3/95* Time: *8:40*
Analyzed by: *DC* Date: *7/5/95*
Type of Sample: *Water*

Aromatic Volatile Organics

<i>Component</i>	<i>Measured Concentration ug/L</i>	<i>Detection Limit Concentration ug/L</i>
<i>Benzene</i>	<i>1.8</i>	<i>0.2</i>
<i>Toluene</i>	<i>0.9</i>	<i>0.2</i>
<i>Ethylbenzene</i>	<i>1.0</i>	<i>0.2</i>
<i>m,p-Xylene</i>	<i>3.0</i>	<i>0.2</i>
<i>o-Xylene</i>	<i>1.6</i>	<i>0.2</i>
	<i>TOTAL 8.3 ug/L</i>	

ND - Not Detectable

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

Approved by: *[Signature]*
Date: *7/5/95*



OFF: (505) 325-8786

LAB: (505) 325-5667

AROMATIC VOLATILE ORGANICS

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

Date: *7/5/95*
COC No.: *3127*
Sample No. *7118*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Locations*
Project Location: *Well 6-6, MW#2*
Sampled by: *REO* Date: *7/3/95* Time: *8:57*
Analyzed by: *DC* Date: *7/5/95*
Type of Sample: *Water*

Aromatic Volatile Organics

Component	Measured Concentration ug/L	Detection Limit Concentration ug/L
<i>Benzene</i>	ND	0.2
<i>Toluene</i>	ND	0.2
<i>Ethylbenzene</i>	ND	0.2
<i>m,p-Xylene</i>	0.4	0.2
<i>o-Xylene</i>	ND	0.2
	TOTAL 0.4 ug/L	

ND - Not Detectable

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

Approved by: *Ja G*
Date: *7/5/95*



OFF: (505) 325-8786

LAB: (505) 325-5667

AROMATIC VOLATILE ORGANICS

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

Date: *7/5/95*
COC No.: *3127*
Sample No. *7119*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Locations*
Project Location: *Well 6-6, MW#3*
Sampled by: *REO* Date: *7/3/95* Time: *9:17*
Analyzed by: *DC* Date: *7/5/95*
Type of Sample: *Water*

Aromatic Volatile Organics

<i>Component</i>	<i>Measured Concentration ug/L</i>	<i>Detection Limit Concentration ug/L</i>
<i>Benzene</i>	<i>4.8</i>	<i>0.2</i>
<i>Toluene</i>	<i>7.8</i>	<i>0.2</i>
<i>Ethylbenzene</i>	<i>2.9</i>	<i>0.2</i>
<i>m,p-Xylene</i>	<i>1.3</i>	<i>0.2</i>
<i>o-Xylene</i>	<i>13.3</i>	<i>0.2</i>
	<i>TOTAL 30.1 ug/L</i>	

ND - Not Detectable

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

Approved by: *Jalix*
Date: *7/5/95*

OFF: (505) 325-8786



LAB: (505) 325-5667

QUALITY ASSURANCE REPORT
for EPA Method 8020

Date Analyzed: 7/5/95

Internal QC No.: 0379-STD
Surrogate QC No.: 0378-STD
Reference Standard QC No.: 0355-STD

Method Blank

Analytes in Blank	Amount
Average Amount of All Analytes In Blank	<0.2 ppb

Calibration Check

Calibration Standards	Units of Measure	*True Value	Analyzed Value	% Diff	Limit
Benzene	ppb	20	19	3	15%
Toluene	ppb	20	19	5	15%
Ethylbenzene	ppb	20	19	7	15%
m,p-Xylene	ppb	40	38	5	15%
o-Xylene	ppb	20	18	9	15%

Spike Results

Analyte	1- Percent Recovered	2 - Percent Recovered	Limit	%RSD	Limit
Benzene	100	96	(39-150)	3	20%
Toluene	96	94	(46-148)	2	20%
Ethylbenzene	99	97	(32-160)	1	20%
m,p-Xylene	98	96	(35-145)	2	20%
o-Xylene	86	84	(35-145)	2	20%

Surrogate Recoveries

Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered	S3 Percent Recovered
Limits	(70-130)		
7117-3127	98		

S1: Fluorobenzene

NORTH HOGBACK #7-1

SEPARATOR PIT

FIELD REPORTS & ANALYTICAL RESULTS

CLIENT: DUNCAU OIL BLAGG ENGINEERING, INC. PIT NO: _____
 P.O. BOX 87, BLOOMFIELD, NM 87413 C.O.C. NO: 3086
 (505) 632-1199

FIELD REPORT: SITE ASSESSMENT

JOB No: _____
 PAGE No: 1 of 1
 DATE STARTED: 6-13-95
 DATE FINISHED: 6-14-95
 ENVIRO. SPCLT: JCB/REO
 OPERATOR: EPC

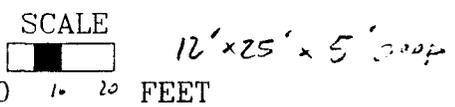
PROJECT: PIT ASSESSMENT
 CONTRACTOR: BLAGG ENGINEERING
 EQUIPMENT USED: CAT BACKHOE / OVM / TPH UNIT

LOCATION: NAME: N. HOGBACK UNIT SEC. 7 WELL #: 1 PIT: PRODUCTION (SEPARATOR) SOUTH
 QUAD/UNIT: 2310 N. 330 W. SEC. 7 TWP: 29N RNG: 16W PM: NM CNTY: SJ ST: NM
 LAND USE: RANGE LEASE #: 14-20-0603-10009
 SURFACE CONDITIONS: OIL STAINED GRAVEL / GRASS - DRY

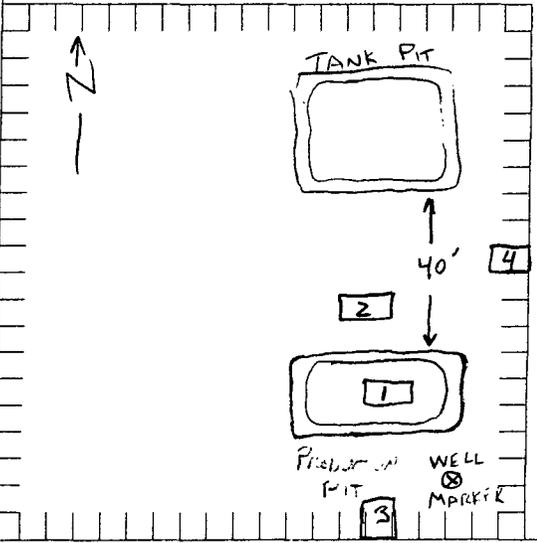
FIELD NOTES & REMARKS: PIT IS LOCATED APPROXIMATELY 25' FEET N15°W OF WELLHEAD.
 DEPTH TO G.W.: 250' NEAREST WATER SOURCE: >1000' NEAREST SURFACE WATER >1000'
 RANKING SCORE: 20 CLOSURE STD: 100 ppm

SAMPLE INVENTORY		
SAMPL ID:	SAMPL TYPE:	LABORATORY ANALYSIS:
TH1 @ 10'	WATER	BTEX
TH3 @ 10'	WATER	BTEX
TH4 @ 105'	WATER	BTEX

BLACK STAIN ~ 1' BENEATH PIT BOTTOM.
 GROSS CONTAMINATION TO WATER TABLE.
 TH2 WATER: SLIGHT ODOR + SHEEN (10' FROM PIT)
 TH3 WATER: NO ODOR / SHEEN. (15' FROM PIT)
 TH4 WATER: NO SHEEN, SWAMPY ODOR. (~25' FROM EACH PIT)
 LIGHT SOIL STAIN.



SITE DIAGRAM

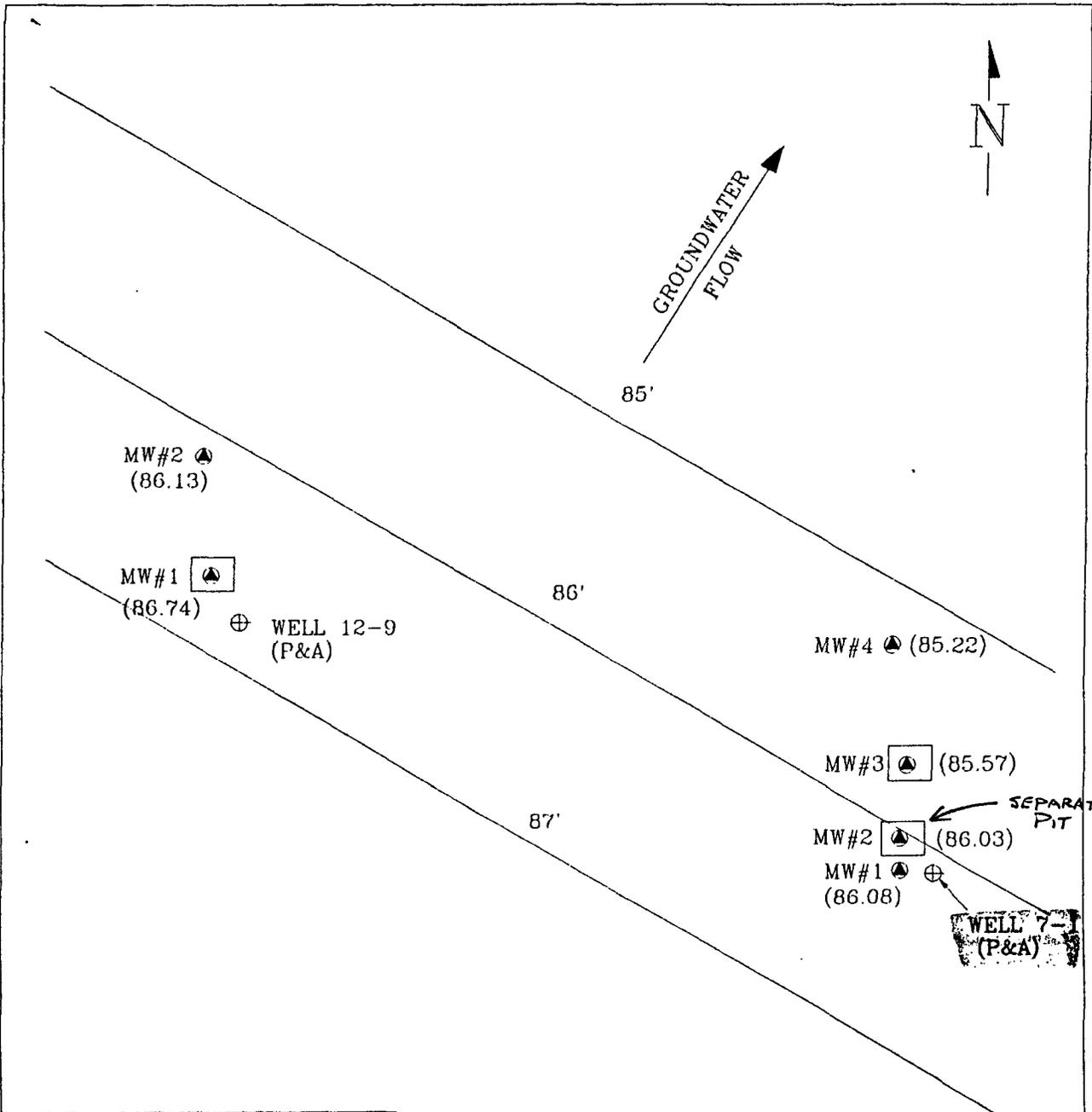


TEST HOLE LOGS:

TH#:	SOIL TYPE:	SAMPL TYPE:	OVM/TPH
TH# 1	GP	BLACK ODOR	TD = 10'
TH# 2	GP	BROWN NO STAIN NO ODOR	TD = 11' pH = 7.7 COND. = 1400
TH# 3	GP	BROWN NO STAIN NO ODOR	TD = 11'
TH# 4	GP	NO STAIN NO ODOR	TD = 12'

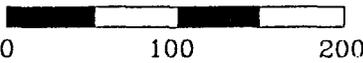
SOIL TYPE: C - Clay, M - Sil, S - Sand, G - Gravel Plasticity: L - None, H - Plastic Grading: P - Poorly, W - Well

2 SAMPLE



LEGEND

 GROUNDWATER MONITORING WELL
 (86.64) GROUNDWATER ELEVATION


 0 100 200
 FEET

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

DUNCAN ENERGY COMPANY

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

**SITE
 DIAGRAM**

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



OFF: (505) 325-8786

LAB: (505) 325-5667

AROMATIC VOLATILE ORGANICS

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

Date: *6/14/95*
COC No.: *3086*
Sample ID: *6785*
Job No. *4-1183*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Unit 7-1, Prod. Pit - TH1 @ 10'*
Sampled by: *REO* Date: *6/13/95*
Analyzed by: *DC* Date: *6/14/95*
Sample Matrix: *Water*

Time: *12:45*

Aromatic Volatile Organics

<i>Component</i>	<i>Measured Concentration ug/L</i>	<i>Detection Limit Concentration ug/L</i>
<i>Benzene</i>	<i>18.3</i>	<i>0.2</i>
<i>Toluene</i>	<i>309.4</i>	<i>0.2</i>
<i>Ethylbenzene</i>	<i>113.0</i>	<i>0.2</i>
<i>m,p-Xylene</i>	<i>134.5</i>	<i>0.2</i>
<i>o-Xylene</i>	<i>34.3</i>	<i>0.2</i>
	<i>TOTAL 609.6 ug/L</i>	

ND - Not Detectable

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

Approved by: *Ja H*
Date: *6/14/95*

P. O. BOX 2606 • FARMINGTON, NM 87499

- *TECHNOLOGIES, LTD.*



OFF: (505) 325-8786

LAB: (505) 325-5667

AROMATIC VOLATILE ORGANICS

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

Date: *6/20/95*
COC No.: *2947*
Sample No. *6852*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Unit 7-1, Production Pit - TH3 @ 10'*
Sampled by: *REO* Date: *6/14/95* Time: *12:00*
Analyzed by: *DC* Date: *6/19/95*
Type of Sample: *Water*

Aromatic Volatile Organics

<i>Component</i>	<i>Measured Concentration ug/L</i>	<i>Detection Limit Concentration ug/L</i>
<i>Benzene</i>	ND	0.2
<i>Toluene</i>	ND	0.2
<i>Ethylbenzene</i>	ND	0.2
<i>m,p-Xylene</i>	ND	0.2
<i>o-Xylene</i>	ND	0.2
	<i>TOTAL 0.0 ug/L</i>	

ND - Not Detectable

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

Approved by: *DeLy*
Date: *6/20/95*

P. O. BOX 2606 • FARMINGTON, NM 87499



OFF: (505) 325-8786

LAB: (505) 325-5667

AROMATIC VOLATILE ORGANICS

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

Date: *6/20/95*
COC No.: *2947*
Sample No. *6853*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Unit 7-1, Production Pit - TH4 @ 10.5'*
Sampled by: *REO* Date: *6/14/95* Time: *12:50*
Analyzed by: *DC* Date: *6/19/95*
Type of Sample: *Water*

Aromatic Volatile Organics

<i>Component</i>	<i>Measured Concentration ug/L</i>	<i>Detection Limit Concentration ug/L</i>
<i>Benzene</i>	<i>0.9</i>	<i>0.2</i>
<i>Toluene</i>	<i>3.9</i>	<i>0.2</i>
<i>Ethylbenzene</i>	<i>0.9</i>	<i>0.2</i>
<i>m,p-Xylene</i>	<i>0.6</i>	<i>0.2</i>
<i>o-Xylene</i>	<i>3.2</i>	<i>0.2</i>
	<i>TOTAL 9.5 ug/L</i>	

ND - Not Detectable

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

Approved by: *DaL*
Date: *6/20/95*

P. O. BOX 2606 • FARMINGTON, NM 87499

TRONG V. B. (405) 325-8786 FAX: (405) 325-5667



OFF: (505) 325-8786

LAB: (505) 325-5667

AROMATIC VOLATILE ORGANICS

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

Date: *7/5/95*
COC No.: *3127*
Sample No. *7121*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Locations*

Project Location: *Well 7-1, MW#2*

Sampled by: *REO* Date: *7/3/95* Time: *10:40*

Analyzed by: *DC* Date: *7/5/95*

Type of Sample: *Water*

Aromatic Volatile Organics

<i>Component</i>	<i>Measured Concentration ug/L</i>	<i>Detection Limit Concentration ug/L</i>
<i>Benzene</i>	<i>7.5</i>	<i>0.2</i>
<i>Toluene</i>	<i>13.6</i>	<i>0.2</i>
<i>Ethylbenzene</i>	<i>83.9</i>	<i>0.2</i>
<i>m,p-Xylene</i>	<i>396.0</i>	<i>0.2</i>
<i>o-Xylene</i>	<i>97.6</i>	<i>0.2</i>
	<i>TOTAL 598.6 ug/L</i>	

ND - Not Detectable

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

Approved by: *[Signature]*
Date: *7/5/95*

OFF: (505) 325-8786



LAB: (505) 325-5667

QUALITY ASSURANCE REPORT
for EPA Method 8020

Date Analyzed: 7/5/95

Internal QC No.: 0379-STD
Surrogate QC No.: 0378-STD
Reference Standard QC No.: 0355-STD

Method Blank

Analytes in Blank	Amount
Average Amount of All Analytes In Blank	<0.2 ppb

Calibration Check

Calibration Standards	Units of Measure	*True Value	Analyzed Value	% Diff	Limit
Benzene	ppb	20	19	3	15%
Toluene	ppb	20	19	5	15%
Ethylbenzene	ppb	20	19	7	15%
m,p-Xylene	ppb	40	38	5	15%
o-Xylene	ppb	20	18	9	15%

Spike Results

Analyte	1- Percent Recovered	2 - Percent Recovered	Limit	%RSD	Limit
Benzene	100	96	(39-150)	3	20%
Toluene	96	94	(46-148)	2	20%
Ethylbenzene	99	97	(32-160)	1	20%
m,p-Xylene	98	96	(35-145)	2	20%
o-Xylene	86	84	(35-145)	2	20%

Surrogate Recoveries

Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered	S3 Percent Recovered
Limits	(70-130)		
7117-3127	98		

S1: Fluorobenzene

OFF: (505) 325-8786



LAB: (505) 325-5667

QUALITY ASSURANCE REPORT
for EPA Method 8020

Date Analyzed: 6/14/95

Internal QC No.: 0379-STD
Surrogate QC No.: 0378-STD
Reference Standard QC No.: 0355-STD

Method Blank

Analytes in Blank	Amount
Average Amount of All Analytes In Blank	<0.2 ppb

Calibration Check

Calibration Standards	Units of Measure	*True Value	Analyzed Value	% Diff	Limit
Benzene	ppb	20	21	4	15%
Toluene	ppb	20	20	1	15%
Ethylbenzene	ppb	20	20	0	15%
m,p-Xylene	ppb	40	42	5	15%
o-Xylene	ppb	20	20	1	15%

Spike Results

Analyte	1- Percent Recovered	2 - Percent Recovered	Limit	%RSD	Limit
Benzene	105	108	(39-150)	2	20%
Toluene	89	91	(46-148)	2	20%
Ethylbenzene	49	52	(32-160)	4	20%
m,p-Xylene	-128	-125	(35-145)	-1	20%
o-Xylene	92	95	(35-145)	2	20%

Surrogate Recoveries

Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered	S3 Percent Recovered
Limits	(70-130)		
6783-3086	102		

S1: Fluorobenzene

OFF: (505) 325-8786



LAB: (505) 325-5667

QUALITY ASSURANCE REPORT
for EPA Method 8020

Date Analyzed: 6/19/95

Internal QC No.: 0379-STD
Surrogate QC No.: 0378-STD
Reference Standard QC No.: 0355-STD

Method Blank

Analytes in Blank	Amount
Average Amount of All Analytes In Blank	<0.2 ppb

Calibration Check

Calibration Standards	Units of Measure	*True Value	Analyzed Value	% Diff	Limit
Benzene	ppb	20	20	2	15%
Toluene	ppb	20	20	1	15%
Ethylbenzene	ppb	20	20	0	15%
m,p-Xylene	ppb	40	42	4	15%
o-Xylene	ppb	20	20	1	15%

Spike Results

Analyte	1 - Percent Recovered	2 - Percent Recovered	Limit	%RSD	Limit
Benzene	116	123	(39-150)	4	20%
Toluene	107	110	(46-148)	2	20%
Ethylbenzene	108	111	(32-160)	2	20%
m,p-Xylene	111	112	(35-145)	1	20%
o-Xylene	101	104	(35-145)	3	20%

Surrogate Recoveries

Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered	S3 Percent Recovered
Limits	(70-130)		
6850-2947	102		

S1: Fluorobenzene



CHAIN OF CUSTODY RECORD

DATE

Date: 6-16-95

Page 1 of 1

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

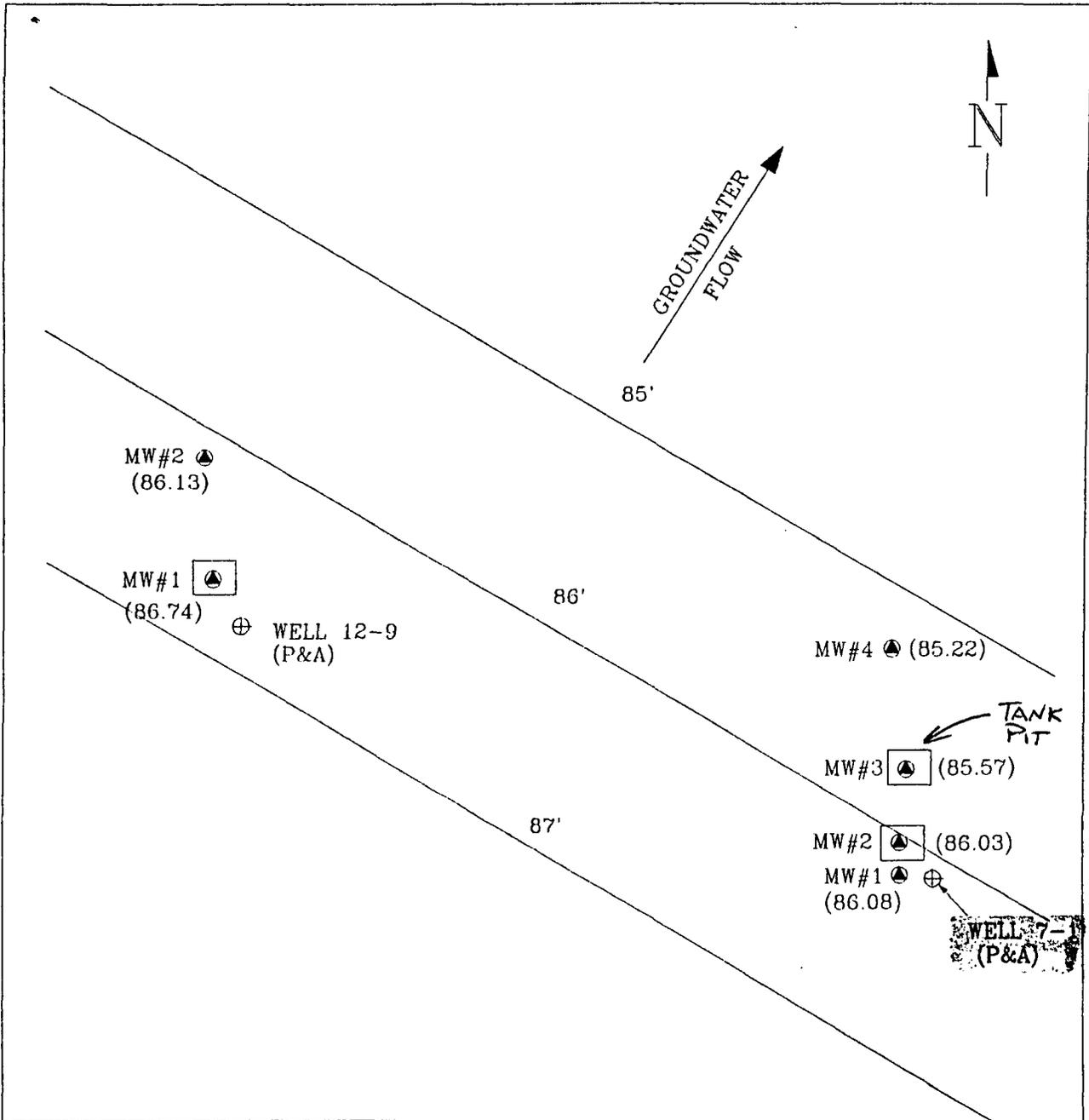
Purchase Order No.:		Job No. <u>DUNCAN OIL</u>		Name <u>R. E. O'NEILL</u>		Title																																																	
SEND INVOICE TO		Company <u>BLAGG ENGINEERING</u>		Company <u>SAME</u>																																																			
Address <u>P.O. BOX 87</u>		Dept.		Mailing Address																																																			
City, State, Zip <u>BLOOMFIELD</u>				City, State, Zip		Telephone No.																																																	
Sampling Location:		<u>NORTH HOG BACK UNIT</u>		ANALYSIS REQUESTED																																																			
Sampler: <u>R. E. O'NEILL</u>				<table border="1"> <tr> <td colspan="2">RESULTS TO REPORT</td> <td colspan="2">Number of Containers</td> <td colspan="2" rowspan="5"> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">BTEX</div> </td> <td colspan="2">LAB ID</td> </tr> <tr> <td>UNIT 7-1, TRK BATTERY PIT, TH3 @ 10'</td> <td>SAMPLE DATE</td> <td>TIME</td> <td>MATRIX</td> <td>PRES.</td> <td>2</td> <td>✓</td> <td>6850-7947</td> </tr> <tr> <td>UNIT 7-1, TRK BATT. PIT, TH4 @ 10'</td> <td>"</td> <td>1125</td> <td>"</td> <td>"</td> <td>2</td> <td>✓</td> <td>6851</td> </tr> <tr> <td>UNIT 7-1, PROD. PIT, TH3 @ 10'</td> <td>"</td> <td>1200</td> <td>"</td> <td>"</td> <td>2</td> <td>✓</td> <td>6852</td> </tr> <tr> <td>UNIT 7-1, PROD. PIT, TH4 @ 10.5'</td> <td>"</td> <td>1250</td> <td>"</td> <td>"</td> <td>2</td> <td>✓</td> <td>6853</td> </tr> <tr> <td>UNIT 12-9, PROD. PIT, TH5 @ 9'</td> <td>"</td> <td>1420</td> <td>"</td> <td>"</td> <td>2</td> <td>✓</td> <td>6854</td> </tr> </table>				RESULTS TO REPORT		Number of Containers		<div style="writing-mode: vertical-rl; transform: rotate(180deg);">BTEX</div>		LAB ID		UNIT 7-1, TRK BATTERY PIT, TH3 @ 10'	SAMPLE DATE	TIME	MATRIX	PRES.	2	✓	6850-7947	UNIT 7-1, TRK BATT. PIT, TH4 @ 10'	"	1125	"	"	2	✓	6851	UNIT 7-1, PROD. PIT, TH3 @ 10'	"	1200	"	"	2	✓	6852	UNIT 7-1, PROD. PIT, TH4 @ 10.5'	"	1250	"	"	2	✓	6853	UNIT 12-9, PROD. PIT, TH5 @ 9'	"	1420	"	"	2	✓	6854
RESULTS TO REPORT		Number of Containers		<div style="writing-mode: vertical-rl; transform: rotate(180deg);">BTEX</div>		LAB ID																																																	
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UNIT 12-9, PROD. PIT, TH5 @ 9'	"	1420	"	"	2	✓	6854																																																
Relinquished by: <u>R. E. O'Neil</u>		Date/Time <u>6-16 0746</u>		Received by: <u>Heleen Vely</u>		Date/Time <u>6/16/95 0746</u>																																																	
Relinquished by: <u>Heleen Vely</u>		Date/Time <u>6/17/95 1105</u>		Received by: <u>g b</u>		Date/Time <u>6/17/95 1105</u>																																																	
Relinquished by:		Date/Time		Received by:		Date/Time																																																	
Method of Shipment:		Rush		24-48 Hours		10 Working Days																																																	
Authorized by: <u>R. E. O'Neil</u>		Date <u>6-16-95</u>		Special Instructions:																																																			

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

NORTH HOGBACK #7-1

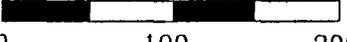
TANK PIT

FIELD REPORTS & ANALYTICAL RESULTS



LEGEND

 GROUNDWATER MONITORING WELL
 (86.64) GROUNDWATER ELEVATION


 0 100 200
 FEET

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

DUNCAN ENERGY COMPANY

BLAGG ENGINEERING, INC.

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

SITE
 DIAGRAM

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



OFF: (505) 325-8786

LAB: (505) 325-5667

AROMATIC VOLATILE ORGANICS

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

Date: *6/14/95*
COC No.: *3086*
Sample ID: *6786*
Job No. *4-1183*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Unit 7-1, Tank Batt. Pit - TH1 @ 13'*
Sampled by: *REO* Date: *6/13/95*
Analyzed by: *DC* Date: *6/14/95*
Sample Matrix: *Water*

Time: *13:10*

Aromatic Volatile Organics

<i>Component</i>	<i>Measured Concentration ug/L</i>	<i>Detection Limit Concentration ug/L</i>
<i>Benzene</i>	<i>1.1</i>	<i>0.2</i>
<i>Toluene</i>	<i>8.9</i>	<i>0.2</i>
<i>Ethylbenzene</i>	<i>40.5</i>	<i>0.2</i>
<i>m,p-Xylene</i>	<i>371.7</i>	<i>0.2</i>
<i>o-Xylene</i>	<i>0.6</i>	<i>0.2</i>
	<i>TOTAL 422.7 ug/L</i>	

ND - Not Detectable

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

Approved by: *Jack*
Date: *6/14/95*



OFF: (505) 325-8786

LAB: (505) 325-5667

AROMATIC VOLATILE ORGANICS

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

Date: *6/20/95*
COC No.: *2947*
Sample No. *6850*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Unit 7-1, Tank Battery Pit - TH3 @ 10'*
Sampled by: *REO* Date: *6/14/95* Time: *10:35*
Analyzed by: *DC* Date: *6/19/95*
Type of Sample: *Water*

Aromatic Volatile Organics

<i>Component</i>	<i>Measured Concentration ug/L</i>	<i>Detection Limit Concentration ug/L</i>
<i>Benzene</i>	<i>ND</i>	<i>0.2</i>
<i>Toluene</i>	<i>ND</i>	<i>0.2</i>
<i>Ethylbenzene</i>	<i>ND</i>	<i>0.2</i>
<i>m,p-Xylene</i>	<i>ND</i>	<i>0.2</i>
<i>o-Xylene</i>	<i>ND</i>	<i>0.2</i>
	<i>TOTAL 0.0 ug/L</i>	

ND - Not Detectable

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

Approved by: *Ja G*
Date: *6/20/95*



OFF: (505) 325-8786

LAB: (505) 325-5667

AROMATIC VOLATILE ORGANICS

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

Date: *6/20/95*
COC No.: *2947*
Sample No. *6851*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Unit 7-1, Tank Battery Pit - TH4 @ 10'*
Sampled by: *REO* Date: *6/14/95* Time: *11:25*
Analyzed by: *DC* Date: *6/19/95*
Type of Sample: *Water*

Aromatic Volatile Organics

<i>Component</i>	<i>Measured Concentration ug/L</i>	<i>Detection Limit Concentration ug/L</i>
<i>Benzene</i>	ND	0.2
<i>Toluene</i>	ND	0.2
<i>Ethylbenzene</i>	ND	0.2
<i>m,p-Xylene</i>	ND	0.2
<i>o-Xylene</i>	ND	0.2
	<i>TOTAL 0.0 ug/L</i>	

ND - Not Detectable

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

Approved by: *Ja-L*
Date: *6/20/95*



OFF: (505) 325-8786

LAB: (505) 325-5667

AROMATIC VOLATILE ORGANICS

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

Date: *7/5/95*
COC No.: *3127*
Sample No. *7122*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Locations*
Project Location: *Well 7-1, MW#3*
Sampled by: *REO* Date: *7/3/95* Time: *10:50*
Analyzed by: *DC* Date: *7/5/95*
Type of Sample: *Water*

Aromatic Volatile Organics

<i>Component</i>	<i>Measured Concentration ug/L</i>	<i>Detection Limit Concentration ug/L</i>
<i>Benzene</i>	<i>ND</i>	<i>0.2</i>
<i>Toluene</i>	<i>13.1</i>	<i>0.2</i>
<i>Ethylbenzene</i>	<i>39.4</i>	<i>0.2</i>
<i>m,p-Xylene</i>	<i>282.1</i>	<i>0.2</i>
<i>o-Xylene</i>	<i>10.1</i>	<i>0.2</i>
	<i>TOTAL 344.7 ug/L</i>	

ND - Not Detectable

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

Approved by: *Jah*
Date: *7/5/95*

OFF: (505) 325-8786



LAB: (505) 325-5667

QUALITY ASSURANCE REPORT
for EPA Method 8020

Date Analyzed: 7/5/95

Internal QC No.: 0379-STD
Surrogate QC No.: 0378-STD
Reference Standard QC No.: 0355-STD

Method Blank

Analytes in Blank	Amount
Average Amount of All Analytes In Blank	<0.2 ppb

Calibration Check

Calibration Standards	Units of Measure	*True Value	Analyzed Value	% Diff	Limit
Benzene	ppb	20	19	3	15%
Toluene	ppb	20	19	5	15%
Ethylbenzene	ppb	20	19	7	15%
m,p-Xylene	ppb	40	38	5	15%
o-Xylene	ppb	20	18	9	15%

Spike Results

Analyte	1 - Percent Recovered	2 - Percent Recovered	Limit	%RSD	Limit
Benzene	100	96	(39-150)	3	20%
Toluene	96	94	(46-148)	2	20%
Ethylbenzene	99	97	(32-160)	1	20%
m,p-Xylene	98	96	(35-145)	2	20%
o-Xylene	86	84	(35-145)	2	20%

Surrogate Recoveries

Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered	S3 Percent Recovered
Limits	(70-130)		
7117-3127	98		

S1: Fluorobenzene

OFF: (505) 325-8786



LAB: (505) 325-5667

QUALITY ASSURANCE REPORT
for EPA Method 8020

Date Analyzed: 6/14/95

Internal QC No.: 0379-STD
Surrogate QC No.: 0378-STD
Reference Standard QC No.: 0355-STD

Method Blank

Analytes in Blank	Amount
Average Amount of All Analytes In Blank	<0.2 ppb

Calibration Check

Calibration Standards	Units of Measure	*True Value	Analyzed Value	% Diff	Limit
Benzene	ppb	20	21	4	15%
Toluene	ppb	20	20	1	15%
Ethylbenzene	ppb	20	20	0	15%
m,p-Xylene	ppb	40	42	5	15%
o-Xylene	ppb	20	20	1	15%

Spike Results

Analyte	1- Percent Recovered	2 - Percent Recovered	Limit	%RSD	Limit
Benzene	105	108	(39-150)	2	20%
Toluene	89	91	(46-148)	2	20%
Ethylbenzene	49	52	(32-160)	4	20%
m,p-Xylene	-128	-125	(35-145)	-1	20%
o-Xylene	92	95	(35-145)	2	20%

Surrogate Recoveries

Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered	S3 Percent Recovered
Limits	(70-130)		
6783-3086	102		

S1: Fluorobenzene

CHAIN OF CUSTODY RECORD

Page 1 of 1

ON SITE

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

Date: 6-16-95

Purchase Order No.:		Job No. <u>DUNCAN OIL</u>		Name <u>R. E. O'NEILL</u>		Title	
SEND INVOICE TO		Company <u>BLAGG ENGINEERING</u>		Company <u>SAME</u>			
Address <u>P.O. Box 87</u>		Dept.		Mailing Address			
City, State, Zip <u>Bloomfield</u>				City, State, Zip		Telephone No.	
Sampling Location:		NORTH HOGBACK UNIT		ANALYSIS REQUESTED			
Sampler: <u>R. E. O'NEILL</u>							
REPORT RESULTS TO		Number of Containers		BTEX			
Date/Time <u>6-16 0746</u>		Date/Time <u>6/16/95 0746</u>		Received by: <u>Sharon Vely</u>			
Date/Time <u>6/17/95 1105</u>		Date/Time <u>6/17/95 1105</u>		Received by: <u>Sharon Vely</u>			
Date/Time		Date/Time		Received by:			
Method of Shipment:		Rush		24-48 Hours		10 Working Days	
Authorized by: <u>R. E. O'Neil</u>		Date <u>6-16-95</u>		Special Instructions:			
(Client Signature Must Accompany Request)							

OFF: (505) 325-8786



LAB: (505) 325-5667

QUALITY ASSURANCE REPORT
for EPA Method 8020

Date Analyzed: 6/19/95

Internal QC No.: 0379-STD
Surrogate QC No.: 0378-STD
Reference Standard QC No.: 0355-STD

Method Blank

Analytes in Blank	Amount
Average Amount of All Analytes In Blank	<0.2 ppb

Calibration Check

Calibration Standards	Units of Measure	*True Value	Analyzed Value	% Diff	Limit
Benzene	ppb	20	20	2	15%
Toluene	ppb	20	20	1	15%
Ethylbenzene	ppb	20	20	0	15%
m,p-Xylene	ppb	40	42	4	15%
o-Xylene	ppb	20	20	1	15%

Spike Results

Analyte	1- Percent Recovered	2- Percent Recovered	Limit	%RSD	Limit
Benzene	116	123	(39-150)	4	20%
Toluene	107	110	(46-148)	2	20%
Ethylbenzene	108	111	(32-160)	2	20%
m,p-Xylene	111	112	(35-145)	1	20%
o-Xylene	101	104	(35-145)	3	20%

Surrogate Recoveries

Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered	S3 Percent Recovered
Limits	(70-130)		
6850-2947	102		

S1: Fluorobenzene

NORTH HOGBACK #7-3

SEPARATOR PIT

FIELD REPORTS & ANALYTICAL RESULTS

BLAGG ENGINEERING, INC.

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

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

Client:	Duncan Oil	Project #:	
Sample ID:	TH1 @ 15'	Date Analyzed:	6-13-95
Project Location:	North Hogback 7 #3	Date Reported:	6-20-95
Laboratory Number:	TPH-1535	Sample Matrix:	Soil

Parameter	Result, mg/kg	Detection Limit, mg/kg
Total Recoverable Petroleum Hydrocarbons	17,200	100

ND = Not Detectable at stated detection limits.

QA/QC:	QA/QC Sample TPH mg/kg	Duplicate TPH mg/kg	% *Diff.
	1,248	1,224	2

*Administrative Acceptance limits set at 30%.

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

Comments: Production Pit

R. E. O'Neil
Analyst

J. C. Blagg
Review

NORTH HOGBACK #7-4

SEPARATOR PIT

FIELD REPORTS & ANALYTICAL RESULTS

BLAGG ENGINEERING, INC.

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

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

Client:	Duncan Oil	Project #:	
Sample ID:	TH1 @ 15'	Date Analyzed:	6-13-95
Project Location:	North Hogback 7 #4	Date Reported:	6-20-95
Laboratory Number:	TPH-1536	Sample Matrix:	Soil

Parameter	Result, mg/kg	Detection Limit, mg/kg
Total Recoverable Petroleum Hydrocarbons	8,800	100

ND = Not Detectable at stated detection limits.

QA/QC:	QA/QC Sample TPH mg/kg	Duplicate TPH mg/kg	% *Diff.
	1,248	1,224	2

*Administrative Acceptance limits set at 30%.

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

Comments: Production Pit

R. E. O'Neil
Analyst

J. C. Blagg
Review

NORTH HOGBACK #7-6

SEPARATOR PIT

FIELD REPORTS & ANALYTICAL RESULTS

BLAGG ENGINEERING, INC.

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

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

Client:	Duncan Oil	Project #:	
Sample ID:	TH1 @ 12'	Date Analyzed:	6-13-95
Project Location:	North Hogback 7 #6	Date Reported:	6-20-95
Laboratory Number:	TPH-1532	Sample Matrix:	Soil

Parameter	Result, mg/kg	Detection Limit, mg/kg
Total Recoverable Petroleum Hydrocarbons	15,200	100

ND = Not Detectable at stated detection limits.

QA/QC:	QA/QC Sample TPH mg/kg	Duplicate TPH mg/kg	% *Diff.
	1,248	1,224	2

*Administrative Acceptance limits set at 30%.

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

Comments: Production Pit

R. E. O'Neil
Analyst

J.P. Blagg
Review

NORTH HOGBACK #7-6

TANK PIT (NORTH)

FIELD REPORTS & ANALYTICAL RESULTS

BLAGG ENGINEERING, INC.

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

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

Client:	Duncan Oil	Project #:	
Sample ID:	TH1 @ 14'	Date Analyzed:	6-13-95
Project Location:	North Hogback 7 #6	Date Reported:	6-20-95
Laboratory Number:	TPH-1533	Sample Matrix:	Soil

Parameter	Result, mg/kg	Detection Limit, mg/kg
Total Recoverable Petroleum Hydrocarbons	12,700	100

ND = Not Detectable at stated detection limits.

QA/QC:	QA/QC Sample TPH mg/kg	Duplicate TPH mg/kg	% *Diff.
	1,248	1,224	2

*Administrative Acceptance limits set at 30%.

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

Comments: Tank Battery (North Pit)

P. E. O'Neil
Analyst

J. L. Blagg
Review

NORTH HOGBACK #7-6

TANK PIT (SOUTH)

FIELD REPORTS & ANALYTICAL RESULTS

NORTH HOGBACK #12-1

SEPARATOR PIT

FIELD REPORTS & ANALYTICAL RESULTS

BLAGG ENGINEERING, INC.

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

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

Client:	Duncan Oil	Project #:	
Sample ID:	TH1 @ 15'	Date Analyzed:	6-13-95
Project Location:	North Hogback 12 #1	Date Reported:	6-20-95
Laboratory Number:	TPH-1534	Sample Matrix:	Soil

Parameter	Result, mg/kg	Detection Limit, mg/kg
Total Recoverable Petroleum Hydrocarbons	4,200	100

ND = Not Detectable at stated detection limits.

QA/QC:	QA/QC Sample TPH mg/kg	Duplicate TPH mg/kg	% *Diff.
	1,248	1,224	2

*Administrative Acceptance limits set at 30%.

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

Comments: Production Pit

R. E. O'Neill
Analyst

J. C. Blagg
Review

NORTH HOGBACK #12-9

SEPARATOR PIT

FIELD REPORTS & ANALYTICAL RESULTS

CLIENT: <u>DUNCAN</u>	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	LOCATION NO: _____
-----------------------	--	--------------------

FIELD REPORT: SITE ASSESSMENT	PAGE No: <u>2</u> of <u>2</u>
PROJECT: <u>PIT ASSESSMENT</u>	DATE STARTED: <u>6-14-95</u>
CONTRACTOR: <u>BLAGG ENGINEERING</u>	DATE FINISHED: _____

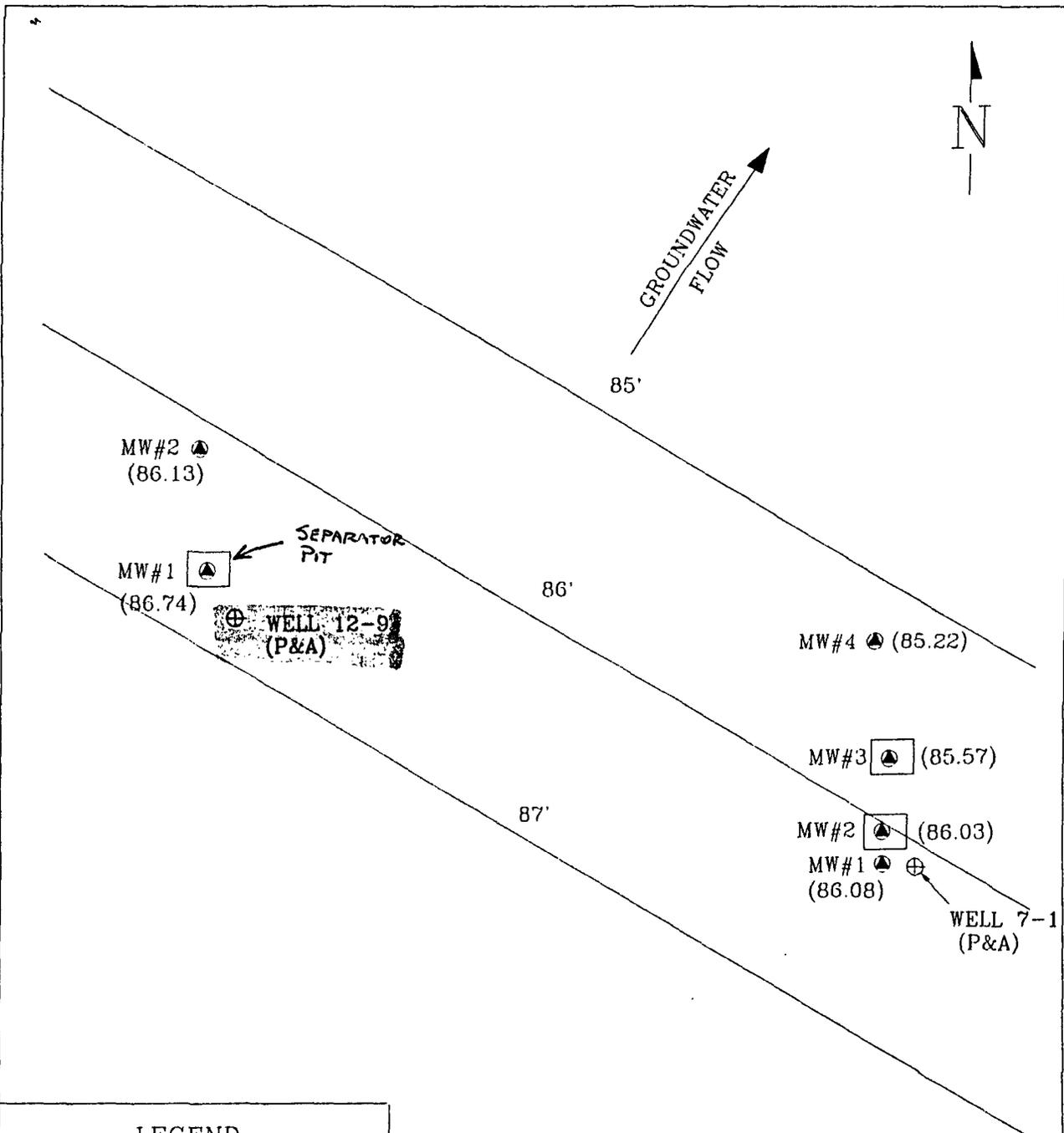
LOCATION: NAME: <u>N. HOGBACK UNIT 12 WELL # 9</u>	PIT: <u>PRODUCTION</u>
QUAD/UNIT: _____	SEC: <u>12</u> TWP: <u>29N</u> RNG: <u>17W</u> PM: <u>NM</u> CNTY: <u>SJ</u> ST: <u>NM</u>

FIELD NOTES & REMARKS:
 TH5: BLACK LAYER AT WATER TABLE - SHEEN ON WATER - SET WELL.

TEST HOLE LOGS:

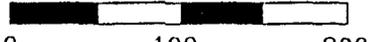
TH#:	SOIL TYPE:	SMPL TYPE:	OVM TYPE:	TPH
TH#: <u>5</u>				
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				

SOIL TYPE: C - Clay, M - Silt, S - Sand, G - Gravel Plasticity: L - None, H - Plastic Grading: P - Poorly, W - Well



LEGEND

 GROUNDWATER MONITORING WELL
 (86.64) GROUNDWATER ELEVATION


 0 100 200
 FEET

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

DUNCAN ENERGY COMPANY

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

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



OFF: (505) 325-8786

LAB: (505) 325-5667

AROMATIC VOLATILE ORGANICS

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

Date: *6/14/95*
COC No.: *3086*
Sample ID: *6784*
Job No. *4-1183*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Unit 12-9, Prod. Pit - TH1 @ 11'*
Sampled by: *REO* Date: *6/13/95*
Analyzed by: *DC* Date: *6/14/95*
Sample Matrix: *Water*

Time: *12:15*

Aromatic Volatile Organics

<i>Component</i>	<i>Measured Concentration ug/L</i>	<i>Detection Limit Concentration ug/L</i>
<i>Benzene</i>	<i>1.1</i>	<i>0.2</i>
<i>Toluene</i>	<i>7.7</i>	<i>0.2</i>
<i>Ethylbenzene</i>	<i>2.5</i>	<i>0.2</i>
<i>m,p-Xylene</i>	<i>7.4</i>	<i>0.2</i>
<i>o-Xylene</i>	<i>0.4</i>	<i>0.2</i>
	<i>TOTAL 19.2 ug/L</i>	

ND - Not Detectable

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

Approved by: *Ja. G.*
Date: *6/14/95*

P. O. BOX 2606 • FARMINGTON, NM 87499

- TECHNICAL SERVICES - A WHOLE NEW APPROACH



OFF: (505) 325-8786

LAB: (505) 325-5667

CHLORIDE ANALYSIS

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

Date: *6/20/95*
COC No.: *3086*
Sample No. *6784*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Unit 12-9, Prod. Pit - TH1 @ 11'*
Sampled by: *REO* Date: *6/13/95*
Analyzed by: *DC* Date: *6/20/95*
Type of Sample: *Water*

Time: *12:15*

Laboratory Analysis

Laboratory Identification	Sample Identification	Total Chloride (Cl-)
<i>6784-3086</i>	<i>Duncan Oil - North Hogback Unit Unit 12-9, Prod. Pit - TH1 @ 11'</i>	<i>21.8 mg/L</i>

Method - Ion Specific Electrode - Direct Measurement

Approved by: *July*
Date: *6/20/95*



OFF: (505) 325-8786

LAB: (505) 325-5667

TOTAL DISSOLVED SOLIDS ANALYSIS

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

Date: *6/20/95*
COC No.: *3086*
Sample No. *6784*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Unit 12-9, Prod. Pit - TH1 @ 11'*
Sampled by: *REO* Date: *6/13/95* Time: *12:15*
Analyzed by: *DC* Date: *6/20/95*
Type of Sample: *Water*

Laboratory Analysis

Laboratory Identification	Sample Identification	Total Dissolved Solids
<i>6784-3086</i>	<i>Duncan Oil - North Hogback Unit Unit 12-9, Prod. Pit - TH1 @ 11'</i>	<i>1,014 mg/L</i>

Method - *Standard Methods Method 2540 C. Total Dissolved Solids Dried at 180C*

Approved by: *Ja K*
Date: *6/20/95*

P. O. BOX 2606 • FARMINGTON, NM 87499

TECHNOLOGIES, LTD. • 10000 N. MEXICO AVE. • FARMINGTON, NM 87401



OFF: (505) 325-8786

LAB: (505) 325-5667

AROMATIC VOLATILE ORGANICS

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

Date: *6/14/95*
COC No.: *3086*
Sample ID: *6783*
Job No. *4-1183*

Project Name: *Duncan Oil - North Hogback Unit*

Project Location: *Unit 12-9, Prod. Pit - TH2 @ 9'*

Sampled by: *REO* Date: *6/13/95*

Time: *12:10*

Analyzed by: *DC* Date: *6/14/95*

Sample Matrix: *Water*

Aromatic Volatile Organics

<i>Component</i>	<i>Measured Concentration ug/L</i>	<i>Detection Limit Concentration ug/L</i>
<i>Benzene</i>	<i>ND</i>	<i>0.2</i>
<i>Toluene</i>	<i>ND</i>	<i>0.2</i>
<i>Ethylbenzene</i>	<i>ND</i>	<i>0.2</i>
<i>m,p-Xylene</i>	<i>ND</i>	<i>0.2</i>
<i>o-Xylene</i>	<i>ND</i>	<i>0.2</i>
	<i>TOTAL 0.0 ug/L</i>	

ND - Not Detectable

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

Approved by: *Jag*
Date: *6/14/95*

P. O. BOX 2606 • FARMINGTON, NM 87499

TECHNOLOGIES, LTD. • 1000 1/2 E. MAIN ST. • FARMINGTON, NM 87401



OFF: (505) 325-8786

LAB: (505) 325-5667

CHLORIDE ANALYSIS

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

Date: *6/20/95*
COC No.: *3086*
Sample No. *6783*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Unit 12-9, Prod. Pit - TH2 @ 9'*
Sampled by: *REO* Date: *6/13/95* Time: *12:10*
Analyzed by: *DC* Date: *6/20/95*
Type of Sample: *Water*

Laboratory Analysis

<i>Laboratory Identification</i>	<i>Sample Identification</i>	<i>Total Chloride (Cl-)</i>
<i>6783-3086</i>	<i>Duncan Oil - North Hogback Unit Unit 12-9, Prod. Pit - TH2 @ 9'</i>	<i>49.8 mg/L</i>

Method - Ion Specific Electrode - Direct Measurement

Approved by: *Jaly*
Date: *6/20/95*



OFF: (505) 325-8786

LAB: (505) 325-5667

TOTAL DISSOLVED SOLIDS ANALYSIS

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

Date: *6/20/95*
COC No.: *3086*
Sample No. *6783*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Unit 12-9, Prod. Pit - TH2 @ 9'*
Sampled by: *REO* Date: *6/13/95*
Analyzed by: *DC* Date: *6/20/95*
Type of Sample: *Water*

Time: *12:10*

Laboratory Analysis

<i>Laboratory Identification</i>	<i>Sample Identification</i>	<i>Total Dissolved Solids</i>
<i>6783-3086</i>	<i>Duncan Oil - North Hogback Unit Unit 12-9, Prod. Pit - TH2 @ 9'</i>	<i>1,162 mg/L</i>

Method - *Standard Methods Method 2540 C. Total Dissolved Solids Dried at 180C*

Approved by: *[Signature]*
Date: *6/20/95*

P. O. BOX 2606 • FARMINGTON, NM 87499



OFF: (505) 325-8786

LAB: (505) 325-5667

AROMATIC VOLATILE ORGANICS

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

Date: *6/20/95*
COC No.: *2947*
Sample No. *6854*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Unit*
Project Location: *Unit 12-9, Production Pit - TH5 @ 9'*
Sampled by: *REO* Date: *6/14/95* Time: *14:20*
Analyzed by: *DC* Date: *6/19/95*
Type of Sample: *Water*

Aromatic Volatile Organics

<i>Component</i>	<i>Measured Concentration ug/L</i>	<i>Detection Limit Concentration ug/L</i>
<i>Benzene</i>	<i>ND</i>	<i>0.2</i>
<i>Toluene</i>	<i>ND</i>	<i>0.2</i>
<i>Ethylbenzene</i>	<i>ND</i>	<i>0.2</i>
<i>m,p-Xylene</i>	<i>ND</i>	<i>0.2</i>
<i>o-Xylene</i>	<i>ND</i>	<i>0.2</i>
	<i>TOTAL 0.0 ug/L</i>	

ND - Not Detectable

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

Approved by: *Ja G*
Date: *6/20/95*



OFF: (505) 325-8786

LAB: (505) 325-5667

AROMATIC VOLATILE ORGANICS

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

Date: *7/5/95*
COC No.: *3127*
Sample No. *7120*
Job No. *2-1000*

Project Name: *Duncan Oil - North Hogback Locations*

Project Location: *Well 12-9, MW#1*

Sampled by: *REO*

Date: *7/3/95* Time: *11:33*

Analyzed by: *DC*

Date: *7/5/95*

Type of Sample: *Water*

Aromatic Volatile Organics

<i>Component</i>	<i>Measured Concentration ug/L</i>	<i>Detection Limit Concentration ug/L</i>
<i>Benzene</i>	<i>ND</i>	<i>0.2</i>
<i>Toluene</i>	<i>4.4</i>	<i>0.2</i>
<i>Ethylbenzene</i>	<i>ND</i>	<i>0.2</i>
<i>m,p-Xylene</i>	<i>21.6</i>	<i>0.2</i>
<i>o-Xylene</i>	<i>7.9</i>	<i>0.2</i>
	<i>TOTAL 33.9 ug/L</i>	

ND - Not Detectable

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

Approved by: *Jahy*
Date: *7/5/95*



CHAIN OF CUSTODY RECORD

3127

Date: 7-3-95 Page 1 of 1

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

Purchase Order No.:		Job No. <u>DUNCAN OIL</u>	
Name		Name <u>JEFF BLAGG</u>	
Company		Company <u>SAME</u>	
Address		Mailing Address	
City, State, Zip		City, State, Zip	
Telephone No.		Telephone No.	
Title		Title	

SEND INVOICE TO

Company BLAGG ENGINEERING Dept.

Address P.O. BOX 87

City, State, Zip Bloomfield NM 87413

Telephone No. 632-1199 Telefax No. 632-3903

Sampling Location: NORTH HOGBACK LOCATIONS

Analyses Requested: ANALYSIS REQUESTED

Sampler:	SAMPLE IDENTIFICATION		SAMPLE DATE		MATRIX	PRES.	Number of Containers	LAB ID
	WELL	M.W. #	DATE	TIME				
<u>R. E. O'NEILL</u>	<u>WELL 6-6</u>	<u>M.W. #1</u>	<u>7-3</u>	<u>0840</u>	<u>WATER</u>	<u>14/12</u>	<u>2</u>	<u>7117-3127</u>
	<u>WELL 6-6</u>	<u>M.W. #2</u>	<u>7-3</u>	<u>0857</u>	<u>"</u>	<u>"</u>	<u>2</u>	<u>7118</u>
	<u>WELL 6-6</u>	<u>M.W. #3</u>	<u>7-3</u>	<u>0917</u>	<u>"</u>	<u>"</u>	<u>2</u>	<u>7119</u>
	<u>WELL 12-9</u>	<u>MW #1</u>	<u>7-3</u>	<u>1133</u>	<u>"</u>	<u>"</u>	<u>2</u>	<u>7120</u>
	<u>WELL 7-1</u>	<u>MW #2</u>	<u>7-3</u>	<u>1040</u>	<u>"</u>	<u>"</u>	<u>2</u>	<u>7121</u>
	<u>WELL 7-1</u>	<u>MW #3</u>	<u>7-3</u>	<u>1050</u>	<u>"</u>	<u>"</u>	<u>2</u>	<u>7122</u>

REPORT RESULTS TO

Received by: R. E. O'NEILL Date/Time 7/3/95 1245

Received by: _____ Date/Time _____

Received by: _____ Date/Time _____

Method of Shipment: _____ 24-48 Hours _____ 10 Working Days _____ Special Instructions: _____

Authorized by: R. E. O'NEILL Date 7-3-95

(Client Signature Must Accompany Request)

OFF: (505) 325-8786



LAB: (505) 325-5667

QUALITY ASSURANCE REPORT
for EPA Method 8020

Date Analyzed: 7/5/95

Internal QC No.: 0379-STD
Surrogate QC No.: 0378-STD
Reference Standard QC No.: 0355-STD

Method Blank

Analytes in Blank	Amount
Average Amount of All Analytes In Blank	<0.2 ppb

Calibration Check

Calibration Standards	Units of Measure	*True Value	Analyzed Value	% Diff	Limit
Benzene	ppb	20	19	3	15%
Toluene	ppb	20	19	5	15%
Ethylbenzene	ppb	20	19	7	15%
m,p-Xylene	ppb	40	38	5	15%
o-Xylene	ppb	20	18	9	15%

Spike Results

Analyte	1- Percent Recovered	2 - Percent Recovered	Limit	%RSD	Limit
Benzene	100	96	(39-150)	3	20%
Toluene	96	94	(46-148)	2	20%
Ethylbenzene	99	97	(32-160)	1	20%
m,p-Xylene	98	96	(35-145)	2	20%
o-Xylene	86	84	(35-145)	2	20%

Surrogate Recoveries

Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered	S3 Percent Recovered
Limits	(70-130)		
7117-3127	98		

S1: Fluorobenzene

OFF: (505) 325-8786



LAB: (505) 325-5667

QUALITY ASSURANCE REPORT
for EPA Method 8020

Date Analyzed: 6/14/95

Internal QC No.: 0379-STD
Surrogate QC No.: 0378-STD
Reference Standard QC No.: 0355-STD

Method Blank

Analytes in Blank	Amount
Average Amount of All Analytes In Blank	<0.2 ppb

Calibration Check

Calibration Standards	Units of Measure	*True Value	Analyzed Value	% Diff	Limit
Benzene	ppb	20	21	4	15%
Toluene	ppb	20	20	1	15%
Ethylbenzene	ppb	20	20	0	15%
m,p-Xylene	ppb	40	42	5	15%
o-Xylene	ppb	20	20	1	15%

Spike Results

Analyte	1- Percent Recovered	2 - Percent Recovered	Limit	%RSD	Limit
Benzene	105	108	(39-150)	2	20%
Toluene	89	91	(46-148)	2	20%
Ethylbenzene	49	52	(32-160)	4	20%
m,p-Xylene	-128	-125	(35-145)	-1	20%
o-Xylene	92	95	(35-145)	2	20%

Surrogate Recoveries

Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered	S3 Percent Recovered
Limits	(70-130)		
6783-3086	102		

S1: Flourobenezene

ON SITE

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

CHAIN OF CUSTODY RECORD

3086

Date: 6-13-95

Page 1 of 1

Purchase Order No.:		Job No. <u>DUNCAN OIL</u>		Name <u>R. E. O'NEILL</u>		Title	
SEND INVOICE TO		Company <u>BLAGG ENGINEERING</u>		Company <u>SAME</u>			
Address		Dept.		Mailing Address			
City, State, Zip				City, State, Zip		Telephone No.	
Sampling Location:		NORTH HOGBACK UNIT		ANALYSIS REQUESTED			
Sampler:		R. E. O'NEILL		Number of Containers			
SAMPLE IDENTIFICATION		SAMPLE DATE		SAMPLE TIME		MATRIX PRES.	
UNIT 12-9, PROD. PIT - TH2 @ 9'		6-13		1210		WATER 11/12	
UNIT 12-9, PROD. PIT - TH1 @ 11'		6-13		1215		WATER 11/12	
UNIT 7-1, PROD. PIT - TH1 @ 10'		6-13		1245		WATER 11/12	
UNIT 7-1, MINE EXT. PIT - TH1 @ 13'		6-13		1310		WATER 11/12	
Relinquished by:		R. E. O'NEILL		Date/Time <u>6-13 1510</u>		Received by:	
Relinquished by:				Date/Time		Date/Time	
Relinquished by:				Date/Time		Date/Time	
Method of Shipment:				Rush		10 Working Days	
Authorized by:		R. E. O'NEILL		Date <u>6-13-95</u>		Special Instructions:	
		(Client Signature Must Accompany Request)					

OFF: (505) 325-8786



LAB: (505) 325-5667

QUALITY ASSURANCE REPORT
for EPA Method 8020

Date Analyzed: 6/19/95

Internal QC No.: 0379-STD
Surrogate QC No.: 0378-STD
Reference Standard QC No.: 0355-STD

Method Blank

Analytes in Blank	Amount
Average Amount of All Analytes In Blank	<0.2 ppb

Calibration Check

Calibration Standards	Units of Measure	*True Value	Analyzed Value	% Diff	Limit
Benzene	ppb	20	20	2	15%
Toluene	ppb	20	20	1	15%
Ethylbenzene	ppb	20	20	0	15%
m,p-Xylene	ppb	40	42	4	15%
o-Xylene	ppb	20	20	1	15%

Spike Results

Analyte	1 - Percent Recovered	2 - Percent Recovered	Limit	%RSD	Limit
Benzene	116	123	(39-150)	4	20%
Toluene	107	110	(46-148)	2	20%
Ethylbenzene	108	111	(32-160)	2	20%
m,p-Xylene	111	112	(35-145)	1	20%
o-Xylene	101	104	(35-145)	3	20%

Surrogate Recoveries

Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered	S3 Percent Recovered
Limits	(70-130)		
6850-2947	102		

S1: Flourobenezene

ON SITE

CHAIN OF CUSTODY RECORD

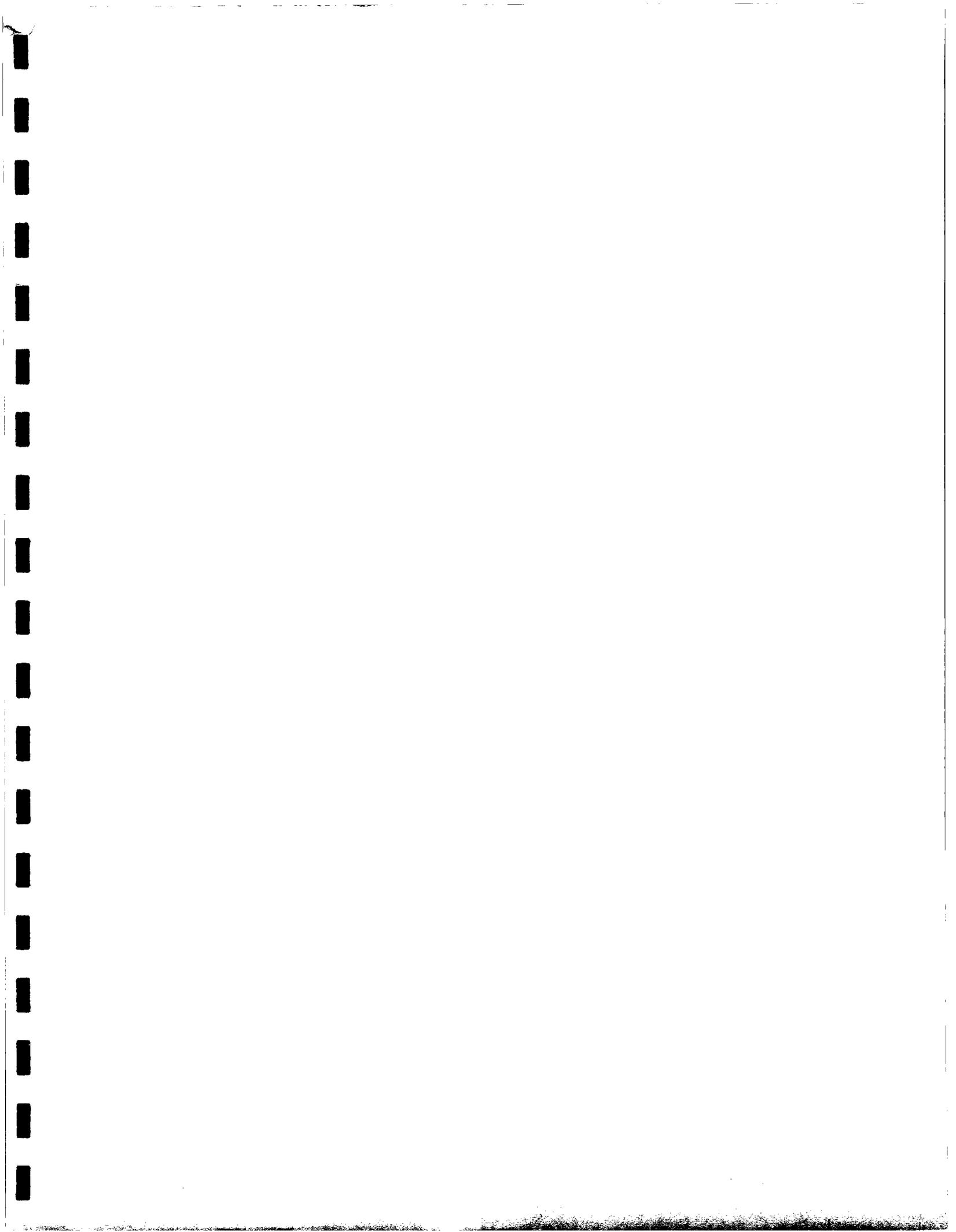
1-7

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

Date: 6-16-95 Page 1 of 1

Purchase Order No.:		Job No. <u>DUNCAN OIL</u>		Name <u>R. E. O'NEILL</u>		Title	
Company <u>BLAGG ENGINEERING</u>		Dept.		Company <u>SAME</u>			
Address <u>P.O. Box 87</u>				Mailing Address			
City, State, Zip <u>Bloomfield</u>				City, State, Zip			
Sampling Location: <u>NORTH HUGBACH UNIT</u>				Telephone No.		Telefax No.	
Sampler: <u>R. E. O'NEILL</u>				ANALYSIS REQUESTED			
RESULTS TO REPORT		Number of Containers					
UNIT	SAMPLE IDENTIFICATION	SAMPLE DATE		TIME	MATRIX	PRES.	LAB ID
		DATE	TIME				
<u>UNIT 7-1, MARK BATTERY PIT, TH3 @ 10'</u>		<u>6-14</u>	<u>1035</u>	<u>1146</u>	<u>WAMP</u>	<u>"</u>	<u>6850-7997</u>
<u>UNIT 7-1, MARK BATT. PIT, TH4 @ 10'</u>		<u>"</u>	<u>1125</u>	<u>"</u>	<u>"</u>	<u>"</u>	<u>6851</u>
<u>UNIT 7-1, PROD. PIT, TH3 @ 10'</u>		<u>"</u>	<u>1200</u>	<u>"</u>	<u>"</u>	<u>"</u>	<u>6852</u>
<u>UNIT 7-1, PROD. PIT, TH4 @ 10.5'</u>		<u>"</u>	<u>1250</u>	<u>"</u>	<u>"</u>	<u>"</u>	<u>6853</u>
<u>UNIT 12-9, PROD. PIT, TH5 @ 9'</u>		<u>"</u>	<u>1420</u>	<u>"</u>	<u>"</u>	<u>"</u>	<u>6854</u>
Relinquished by: <u>R. E. O'Neil</u>		Date/Time <u>6-16 0746</u>		Received by: <u>Sharon Vels</u>		Date/Time <u>6/16/95 0746</u>	
Relinquished by: <u>Sharon Vels</u>		Date/Time <u>6/17/95 1105</u>		Received by: <u>Sharon Vels</u>		Date/Time <u>6/17/95 1105</u>	
Relinquished by:		Date/Time		Received by:		Date/Time	
Method of Shipment:		Rush		24-48 Hours		10 Working Days	
Authorized by: <u>R. E. O'Neil</u>		Date <u>6-16-95</u>		Special Instructions:			
(Client Signature <u>Must</u> Accompany Request)							

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



Roger Anderson



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105-3901

92 AUG 5 AM 8 48
OIL CONSERVATION DIVISION
RECEIVED

July 31, 1992

President
Duncan Oil Company
1777 South Harrison Street P-1
Denver, Colorado 80202

certified mail
Return Receipt Req.

RE: Oil release and discharge at the North Hogback Tank Battery,
Navajo Nation Lease 14-20-0603-9591.

Dear Sir:

The United States Environmental Protection Agency ("EPA") and the Navajo Nation Environmental Protection Administration ("NEPA") conducted a site inspection on July 30, 1992 at your North Hogback Tank Battery located on the SW1/4, NE1/4, Section 1, Township 29N, Range 17W of the New Mexico Principle Meridian (the "Site"). During the inspection it became apparent that there has been a significant discharge and release of oil into the surrounding environment that threatens the Hogback irrigation canal system and the San Juan River; navigable water ways of the United States. The Hogback irrigation canal is utilized throughout the Hogback community to irrigate local crops. The San Juan River is considered to be a sensitive ecosystem and is utilized by the Navajo Tribal Utility as a drinking water source. EPA has been informed by the Navajo Fish and Wildlife Department that the San Juan River basin is home to several Federal and Navajo endangered species such as the Bald Eagle and Colorado squawfish.

Oil has been documented to be released from the on-site heater-treater and two unlined surface pits. EPA has documented oil contaminated soil and debris throughout the Site (see enclosed photos).

Duncan Oil was issued a Notice of Incidents of Noncompliance by the Navajo Nation Minerals Department concerning the release of oil at the Site on July 15, 1992. In addition, the Bureau of Land Management and the NEPA were informed of the release. EPA understands that Duncan Oil has begun to conduct limited clean-up actions to address the release and has currently removed the leaking heater-treater.

Under Section 311(c) of the Clean Water Act, 33 U.S.C. 1321 et seq., (CWA), as amended by Section 4201(a) of the Oil Pollution Act of 1990 (OPA), the Federal government must ensure the effective and immediate removal of a discharge or a

substantial threat of discharge of oil or hazardous substance into or on navigable waters and adjoining shorelines and discharges that may impact natural resources of the United States.

*WPs
contaminants* → EPA believes that there is a substantial threat of discharge of oil into both neighboring water ways, through the migration and dispersion of oil through the groundwater, as a result of the past continuous discharge of oil into the environment from your facility.

*Must comply with
EPA's
National Contingency Plan (NCP)*
The purpose of this letter is to inform you of your potential liability under Section 1002 of OPA with respect to this Site. Section 1002(a) of OPA provides that the responsible party for a vessel or facility from which oil is discharged into navigable water and/or adjoining shorelines, or which poses a substantial threat of a discharge, is liable for: 1) certain specified damages resulting from the threat or the discharge of oil; and 2) removal costs incurred by any person for acts taken by the person which are consistent with the National Contingency Plan (NCP).

The damages for which oil dischargers may be liable pursuant to Section 1002 of OPA include:

- * Natural resources damages, including the reasonable costs of assessing these damages;
- * Loss of subsistence use natural resources;
- * Real or personal property damages;
- * Net loss of tax and other revenues;
- * Loss of profits or earning capacity; and
- * Net cost of additional public services provided during or after removal actions.

Pursuant to Section 1001(20) of OPA, "natural resources" includes land, fish, wildlife, biota, air, water, ground water, drinking water supplies, and other such resources belonging to, managed by, held in trust by, appertaining to, or otherwise controlled by the United States, any State, or Indian Tribe, or local government.

X In addition, this facility and others along the San Juan River are subjected to the provisions and requirements outlined in Sections 311(j)(1)(C), 311(j)(2), 501(a) of the Federal Water Pollution Control Act, 33 U.S.C. 1251 et seq. (40 CFR Part 112 - Oil Pollution Prevention). Pursuant to this Act, (specifically 40 CFR Section 112.7(ii)(B)), secondary containment around the on-site tanks should be able to contain the entire contents of the largest single tank. In the event of a tank failure, the

present earthen berms would not be able to contain and prevent the off-site migration from a release.

EPA is requesting that Duncan Oil conduct the following activities within the set timeframes in order to adequately address the release and/or threatened release from the Site:

1) Within forty-eight hours (48) of receipt of this letter, Duncan Oil shall verbally inform EPA, NEPA and the BLM of its intent to assume full responsibility to perform the necessary response actions outlined herein this letter. Duncan shall follow the verbal notification with a written response.

2) Within twenty-four hours (24) of receipt of this letter, Duncan Oil shall erect a site perimeter fence around the Site in order to restrict access by the public and neighboring livestock. In addition, containment berms should be constructed around the Site to prevent further off-site migration of oil.

3) By no later than August 10, 1992, Duncan Oil should submit for review and approval to the US EPA, NEPA, and BLM, a Site Characterization Plan. This plan should contain sufficient information and detail on how you intend to define, sample and delineate the extent of soil and groundwater contamination resulting from the discharge of oil from the Site. Sampling should identify areas containing elevated concentrations of total petroleum hydrocarbon, benzene, toluene, xylene, ethylbenzene, heavy metals and selenium. The plan should include the name of your project manager and contractor that you intend to utilize to conduct the assessment. If the plan meets all regulatory requirements, EPA may grant verbal approval. Site characterization activities should take no longer than three weeks to complete. If the approved activities require additional time to complete, EPA may grant an extension of time.

4) Duncan Oil shall incorporate and address all comments provided by the regulatory agencies and begin implementation of the plan by no later than one week after approval.

5) Upon completion of the assessment, Duncan Oil shall submit a detailed report summarizing its assessment data and findings to US EPA, NEPA and the BLM. Duncan Oil shall submit for agency review and approval a Site Remediation Plan to address the removal, excavation, treatment and disposal of contaminated soil and waters resulting from the release of oil from the Site. The Site shall be cleaned up to levels protective of public health and the environment and pose no further long term environmental hazard.

6) Duncan Oil shall incorporate and address all agencies comments and begin to implement the Site Remediation Plan within seven (7) days after agency approval.

7) During the implementation of both the Site

Characterization Plan and Site Remediation Plan, Duncan Oil shall submit to US EPA, NEPA and the BLM by the close of business (5:00 pm) each Friday, weekly progress report documenting the events of the past week and documenting upcoming plans.

All sampling and analysis shall be consistent with the "Removal Program Quality Assurance/Quality Control Interim Guidance: Sampling, QA/QC Plan and Data Validation," EPA OSWER Directive 9360.4-01, dated February 2, 1989.

All submittals should be addressed to the following:

Robert Bornstein
United States Environmental Protection Agency
c/o Navajo Superfund Office
P.O. Box 2946
Window Rock, AZ 86515
602-871-6284

Sadie Hoskie
Navajo EPA
P.O. Box 308
Window Rock, AZ 86515
602-871-6352

Donald Elsworth
Bureau of Land Management
Farmington Resource Area
1235 La Plata Highway
Farmington, NM 87491
505-327-5344

If Duncan Oil Company fails to undertake the appropriate actions outlined in this letter, EPA may be forced into issuing you a formal enforcement order under the authority of OPA. Failure to comply with a Federal Removal Order can result in civil penalties of up to \$25,000 for each day of violation or three times the resulting costs incurred by the Oil Pollution Trust Fund if the EPA assumes responsibility for clean-up actions. In addition, EPA also has the authority to administratively assess civil penalties against violators of the Oil Pollution Prevention Regulations (40 CFR Part 112).

If you have any questions or concerns, please feel free to contact me at 602-871-6284 or 415-744-2298.

Sincerely,



Robert E. Bornstein
Federal On-Scene-Coordinator

NA
10/27/92
md

cc: Terry Brubaker, USEPA-ERS
Bill Block, USEPA
Clancy Tenley, USEPA
Sadie Hoskie, NEPA
Arlene Luther, NEPA
Jim Walker, USEPA
Akhtar Zaman, Director, Minerals Department
Don Elsworth, BLM