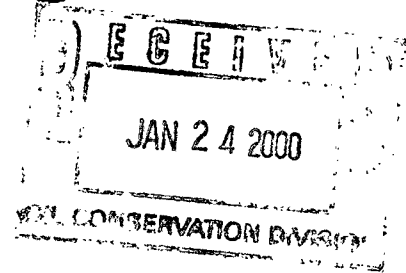


3R - 270

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**  
2000-1995



January 17, 2000

New Mexico Oil Conservation Division  
Mr. Bill Olson  
2400 Pacheco Street  
Sante Fe, NM 85730

Re: Federal 6-32  
Section 6, T26N, R07W, SW/NE  
Rio Arriba County, New Mexico

Please consider the enclosed data for "Final Closure" of pit and monitor well at this location.

Data has been gathered on this location from work done by either Louis Dreyfus Natural Gas personnel or by Contract Environmental Services, Inc., working under directions of LDNG personnel. This data includes a sundry notice, pit remediation and closure report, site diagram, and enclosures 1, 2, and 3 discussed below.

Our initial sampling of the monitor well was within limits outlined by State of New Mexico and BLM guidelines (See Enclosure #1). We received a verbal approval to cease sampling of these wells at that time. LDNG proposes to grout the sample well to surface and abandon.

Excavation was not complete, however a report (See Enclosure #2) from Contract Environmental Services shows that excavation was completed as far as possible without disturbing permanent equipment. Verbal approval was received from OCD and BLM to hold excavation at this point.

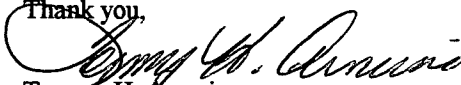
Our attention was then directed to the soil farms for remediation. Soil samples taken in June of 1998 show one of these soil farms is within limits of guidelines (See Enclosure #3). The other soil farm was turned and fertilized and resampled on 6 Dec. 99. These test show this farm also within limits.

Soil from soil farms will be used to contour location in standards for surrounding area and revegetate to BLM standards for the Largo Canyon area.

Soil samples tested below required 100 ppm in Gasoline and Diesel Ranges for both soil farms.

Supporting data for all lab analysis are enclosed and are true and accurate to the best of knowledge. If further information is required, please contact me at (915)387-5355.

Thank you,

  
Tommy H. Arnwine  
Environmental & Safety Director

cc: Gene Simer  
OCD- Aztec-Denny Faust  
BLM- Farmington- Bill Liese

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

FORM APPROVED  
Budget Bureau No. 1004-0135  
Expires: March 31, 1993

**SUNDRY NOTICES AND REPORTS ON WELLS**

Do not use this form for proposals to drill or to deepen or reentry to a different reservoir.  
Use "APPLICATION FOR PERMIT—" for such proposals

**SUBMIT IN TRIPLICATE**

1. Type of Well

☐ Oil Well ☒ Gas Well ☐ Other

2. Name of Operator

Louis Dreyfus Natural Gas

3. Address and Telephone No.

P.O. Box 370, Carlsbad, NM 88221

4. Location of Well (Footage, Sec., T., R., M., or Survey Description)

Sec. 6, T26N, R07W, SW/NE

5. Lease Designation and Serial No.

20784

6. If Indian, Allottee or Tribe Name

7. If Unit or CA, Agreement Designation

8. Well Name and No.

Federal 6-32

9. API Well No.

3003922963

10. Field and Pool, or Exploratory Area

GCNM

11. County or Parish, State

Rio Arriba, New Mexico

12. CHECK APPROPRIATE BOX(s) TO INDICATE NATURE OF NOTICE, REPORT, OR OTHER DATA

TYPE OF SUBMISSION

- ☐ Notice of Intent  
☐ Subsequent Report  
☐ Final Abandonment Notice

TYPE OF ACTION

- ☐ Abandonment  
☐ Recompletion  
☐ Plugging Back  
☐ Casing Repair  
☐ Altering Casing  
☒ Other Final Pit Closure  
☐ Change of Plans  
☐ New Construction  
☐ Non-Routine Fracturing  
☐ Water Shut-Off  
☐ Conversion to Injection  
☐ Dispose Water

(Note: Report results of multiple completion on Well Completion or Recompletion Report and Log form.)

13. Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work. If well is directionally drilled, give subsurface locations and measured and true vertical depths for all markers and zones pertinent to this work.)\*

All Laboratory analysis for soil farms and ground water monitor well have proven within limits of guidelines. LDNG proposes the following leading to "final closure" of pit and monitor well:

- 1) Grout monitor well to top, cut off and abandon.
- 2) Contour soil farm to suit location drainage.
- 3) Reseed to BLM area requirements.

14. I hereby certify that the foregoing is true and correct

Signed

Title Environmental & Safety Director

Date 1-17-2000

(This space for Federal or State office use)

Approved by

Title

Date

Conditions of approval, if any:

## GENERAL INSTRUCTIONS

Instructions concerning the use of this form and the number of copies to be submitted, particularly with regard to local area, or regional procedures and practices, either are shown below or will be issued by, or may be obtained from, the local Federal and/or State office.

This form is designed for submitting proposals to perform certain well operations, and reports of such operations when completed, as indicated, on Federal and Indian lands pursuant to applicable Federal law and regulations, and, if approved or accepted by any State, on all lands in such State, pursuant to applicable State law and regulations. Any necessary special in-

## SPECIFIC INSTRUCTIONS

zones, or other zones with present significant fluid contents not sealed off by cement or otherwise; depths (top and bottom) and method of placement of cement plugs; mud or other material placed below, between and above plugs; amount, size, method of parting of any casing, liner or tubing pulled and the depth to top of any left in the hole; method of closing top of well; and date well site conditioned for final inspection looking to approval of the abandonment.

*Item 4*—If there are no applicable State requirements, locations on Federal or Indian land should be described in accordance with Federal requirements. Consult local State or Federal office for specific instructions.

*Item 13*—Proposals to abandon a well and subsequent reports of abandonment should include such special information as is required by local Federal and/or State offices. In addition, such proposals and reports should include reasons for the abandonment; data on any former or present productive

## NOTICE

The Privacy Act of 1974 and the regulation in 43 CFR 2.48(d) provide that you be furnished the following information in connection with information required by this application.

**AUTHORITY:** 30 U.S.C. 181 et. seq., 351 et. seq., 25 U.S.C. et. seq.; 43 CFR 3160.

**PRINCIPAL PURPOSE** — The information is to be used to evaluate, when appropriate, approve applications, and report completion of secondary well operations, on a Federal or Indian lease.

### ROUTINE USES:

(1) Evaluate the equipment and procedures used during the proposed or completed subsequent well operations.

(2) Request and grant approval to perform those actions covered by 43 CFR 3162.3-2(2).

(3) Analyze future applications to drill or modify operations in light of data obtained and methods used.

(4)(5) Information from the record and/or the record will be transferred to appropriate Federal, State, local or foreign agencies, when relevant to civil, criminal or regulatory investigations or prosecutions.

**EFFECT OF NOT PROVIDING INFORMATION** — Filing of this notice and report and disclosure of the information is mandatory once an oil or gas well is drilled.

The Paperwork Reduction Act of 1980 (44 U.S.C. 3501, et. seq.) requires us to inform you that: This information is being collected in order to evaluate proposed and/or completed subsequent well operations on Federal or Indian oil and gas leases.

This information will be used to report subsequent operations once work is completed and when requested, to obtain approval for subsequent operations not previously authorized.

Response to this request is mandatory for the specific types of activities specified in 43 CFR Part 3160.

## BURDEN HOURS STATEMENT

Public reporting burden for this form is estimated to average 25 minutes per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to U.S. Department of the Interior, Bureau of Land Management, (Alternate) Bureau Clearance Officer, (WO-771), 18 and C Streets, N.W., Washington, D.C. 20240, and the Office of Management and Budget, Paperwork Reduction Project (1004-0135), Washington, D.C. 20503.

Date Remediation Started:

10-4-95

Date completed:

12-6-99

Remediation Method:  
(Check all appropriate  
sections)

Excavation

☒

Approx. cubic yards

388

Landfarmed

☒

Insitu Bioremediation

Other

Remediation Location:  
(i.e. landfarmed onsite,  
name and location of  
offsite facility)

Onsite

☒

Offsite

General Description of Remedial Action:

Placed excavated soil into two land farm areas. Turn soil and fertilize periodically  
and sample.

Ground Water Encountered:

No

☒ Yes

Depth

Final Pit:

Sample location

Closure Sampling:

(if multiple samples,  
attach sample results  
and diagram of sample  
locations and depths)

Sample depth

Sample date

Sample time

Sample Results

Benzene (ppm)

Total BTEX (ppm)

Field headspace (ppm)

TPH

Ground Water Sample:

Yes

☒

No

(If yes, attach sample results)

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST  
OF MY KNOWLEDGE AND BELIEF

DATE 1-17-2000

SIGNATURE

PRINTED NAME  
AND TITLE

Tommy H. Arnwine

Environmental &amp; Safety Director

## District I

P.O. Box 1920, Hobbs, NM

## District II

P.O. Drawer DD,

## District III

1000 Rio Brazos Rd., Aztec, NM 87410

## State of New Mexico

Energy, Minerals and Natural Resources Department

## OIL CONSERVATION DIVISION

P.O. Box 2088

Santa Fe, New Mexico 87504-2088

**SUBMIT 1 COPY TO  
APPROPRIATE  
DISTRICT OFFICE  
AND 1 COPY TO  
SANTO FE OFFICE**

## PIT REMEDIATION AND CLOSURE REPORT

Operator: Luis Dreyfus Natural Gas Telephone: (915)387-5355Address: P.O. Box 525, Sonora, TX 76950Facility Or: Fed. 6-32

Well Name

Location Unit or Qtr/Qtr Sec <sup>SW/SE</sup> Sec 6 T 26N R 07W County Rio ArribaPit Type: Separator Dehydrator OtherLand Type: BLM ,State , Fee , Other Pit Location: Pit dimensions: length 35 , width 25 , depth 12

(Attach diagram)

Reference: wellhead X , Other Footage from reference: 100 ft.

Direction from reference: Degrees 150° East North  
of  
West South

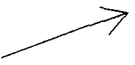
Depth To Ground Water:	Less than 50 feet	(20 points)	
(Vertical distance from	50 feet to 99 feet	(10 points)	
contaminants to seasonal	Greater than 100 feet	(0 points)	<u>20</u>
high water elevation of			
ground water)			

Wellhead Protection Area:	Yes (20 points)	
(Less than 200 feet from a private	No (0 points)	<u>0</u>
domestic water source, or; less than		
1000 feet from all other water sources		

Distance To Surface Water:	Less than 200 feet	(20 points)	
(Horizontal distance to perennial	200 feet to 1000 feet	(10 points)	
lakes, ponds, rivers, streams, creeks,	Greater than 1000 feet	(0 points)	<u>20</u>
irrigation canals and ditches)			

RANKING SCORE (TOTAL POINTS):

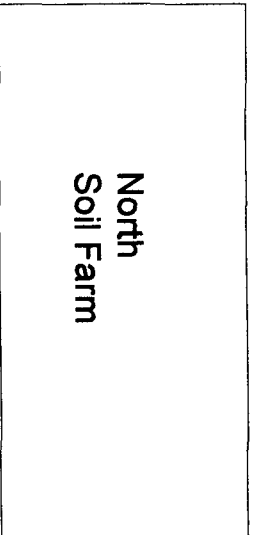
N



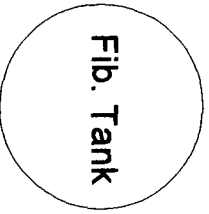
Well



North  
Soil Farm



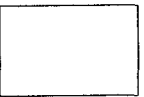
Fib. Tank



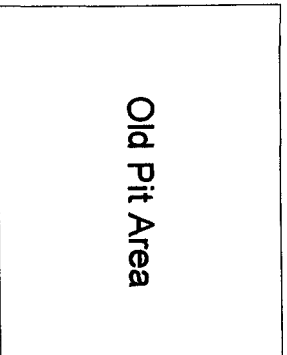
Separator



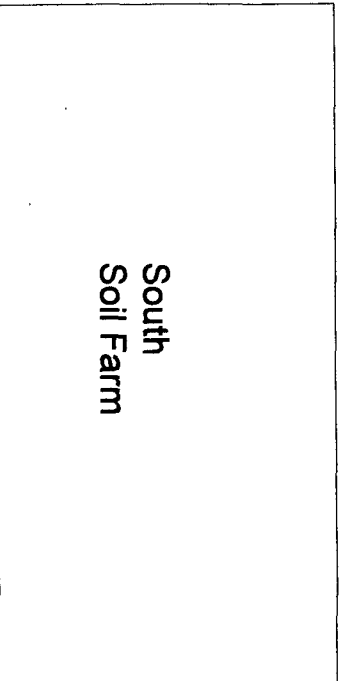
Separator



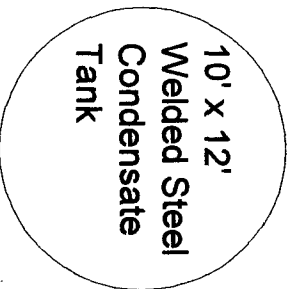
Old Pit Area



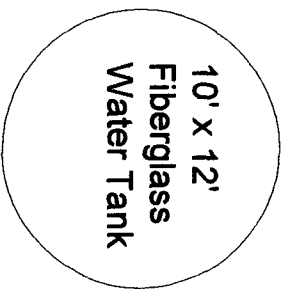
South  
Soil Farm



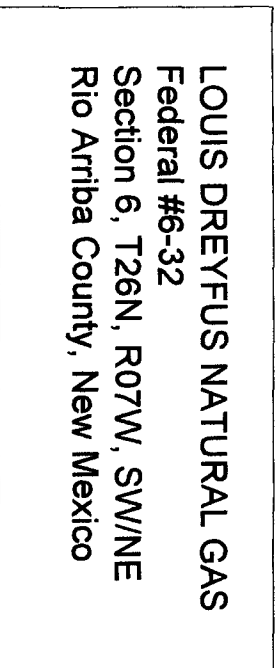
10' x 12'  
Welded Steel  
Condensate  
Tank



10' x 12'  
Fiberglass  
Water Tank



LOUIS DREYFUS NATURAL GAS  
Federal #6-32  
Section 6, T26N, R07W, SW/NE  
Rio Arriba County, New Mexico



**ENCLOSURE #1**

**MONITOR WELL DATA**

**FEDERAL 6-32**



**Contract Environmental Services, Inc.**

**Post Office Box 505  
Kirtland, New Mexico 87417-0505  
Phone (505) 325-1198**

January 21, 1996

Louis Dreyfus Natural Gas Co.  
Mr. Gene Simer  
Post Office Box 370  
Carlsbad, New Mexico 88221

RE: Federal #6-32 (Sec 06, T26N, R07W) Monitor Well

Dear Mr. Simer,

Contract Environmental Services, Inc. (CES) is pleased to present this letter report on the installation of a monitoring well for the Federal #6-32 well location. This report includes background information, scope of services, field test data, laboratory data, conclusions and recommendations.

**Background Information**

On October 4, 1995 CES began excavating contaminated soil from the separator pit on the above referenced well location. The excavation was recently completed with an approximate 150 cubic yards of contaminated soil removed. The soil removed was evenly distributed on the surface where it could be soil farmed until remediated. On October 19, 1995 CES issued a technical report presenting the findings of this investigation. On December 4, 1995 CES installed one monitor well in the anticipated downgradient direction from the excavation. The following day the monitor well was developed and sampled.

**Scope Of Services**

CES with the help of Phillip Environmental installed the monitor well to a depth of approximately 37 feet. The monitor well is located 8' from the northwest corner of the excavation (Please see attached Figure 1). The bottom 15' of the 4" PVC pipe was slotted (Please see attached Figure 2) and the top 22' was completed with unscreened PVC pipe. The bottom of the monitor well has a 4" screw-on plug that prevents sediments from entering the bottom of the well. All of the joints were composed of screw-together threads. Silica sand was backfilled 2' above the slotted interval. Above the sand a 2' bentonite plug was placed. The remainder of the open hole was grouted to within 2' of groundlevel. From this point to the surface, the PVC pipe was cemented in place. A riser was left on the monitoring well approximately 3' above ground level. T-posts and fluorescent flagging was placed on all sides of the monitor well to protect it before leaving.

The monitor well was developed until the muddy water cleared up prior to sampling. An estimated five volumes of water were removed before collection for laboratory analyses. Water samples were gathered to be analyzed for Benzene, Toluene, Ethylbenzene, Xylenes (BTEX); Metals; Cations / Anions; and Polyaromatic Hydrocarbons (PAH). All water was analyzed using EPA Test Methods.

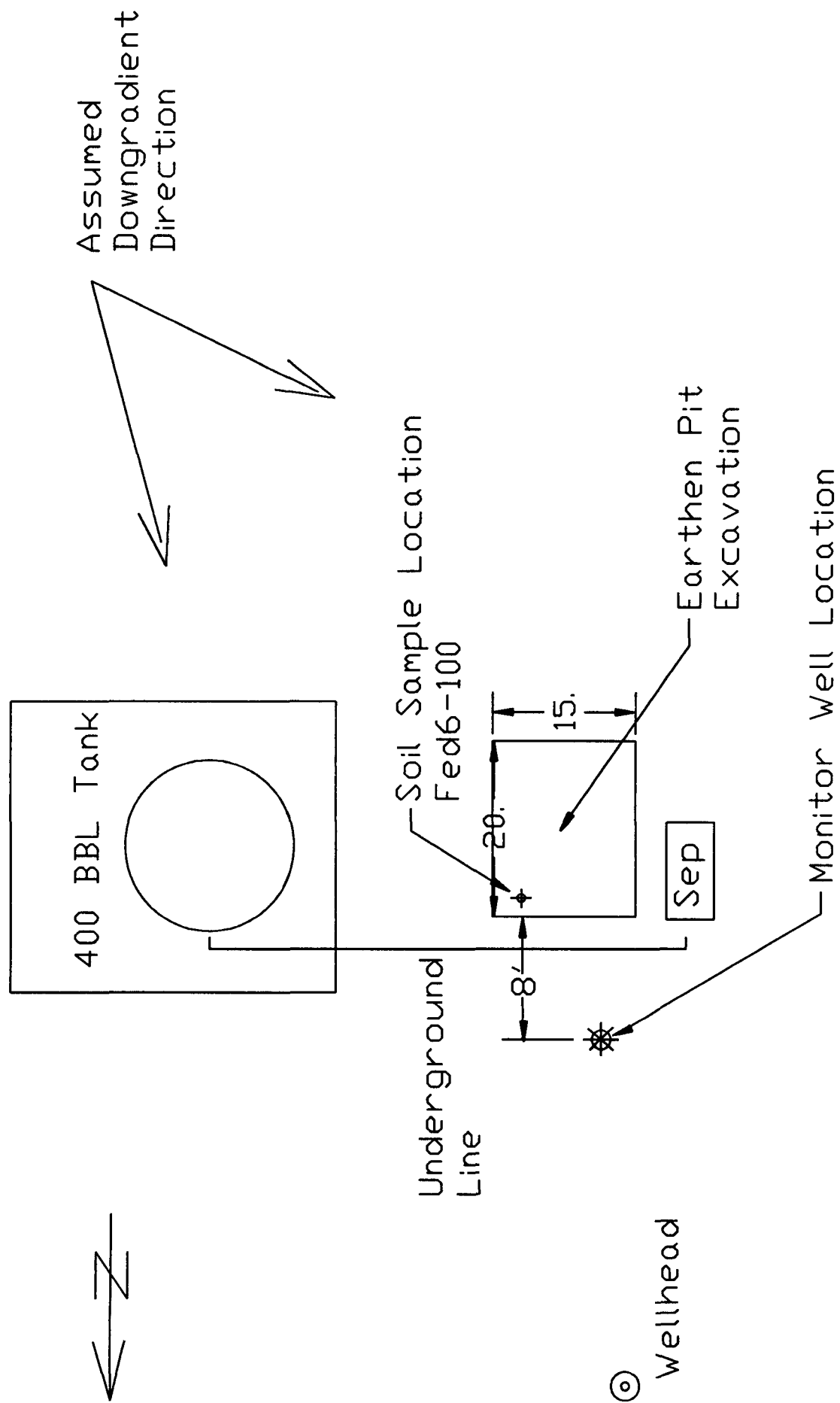
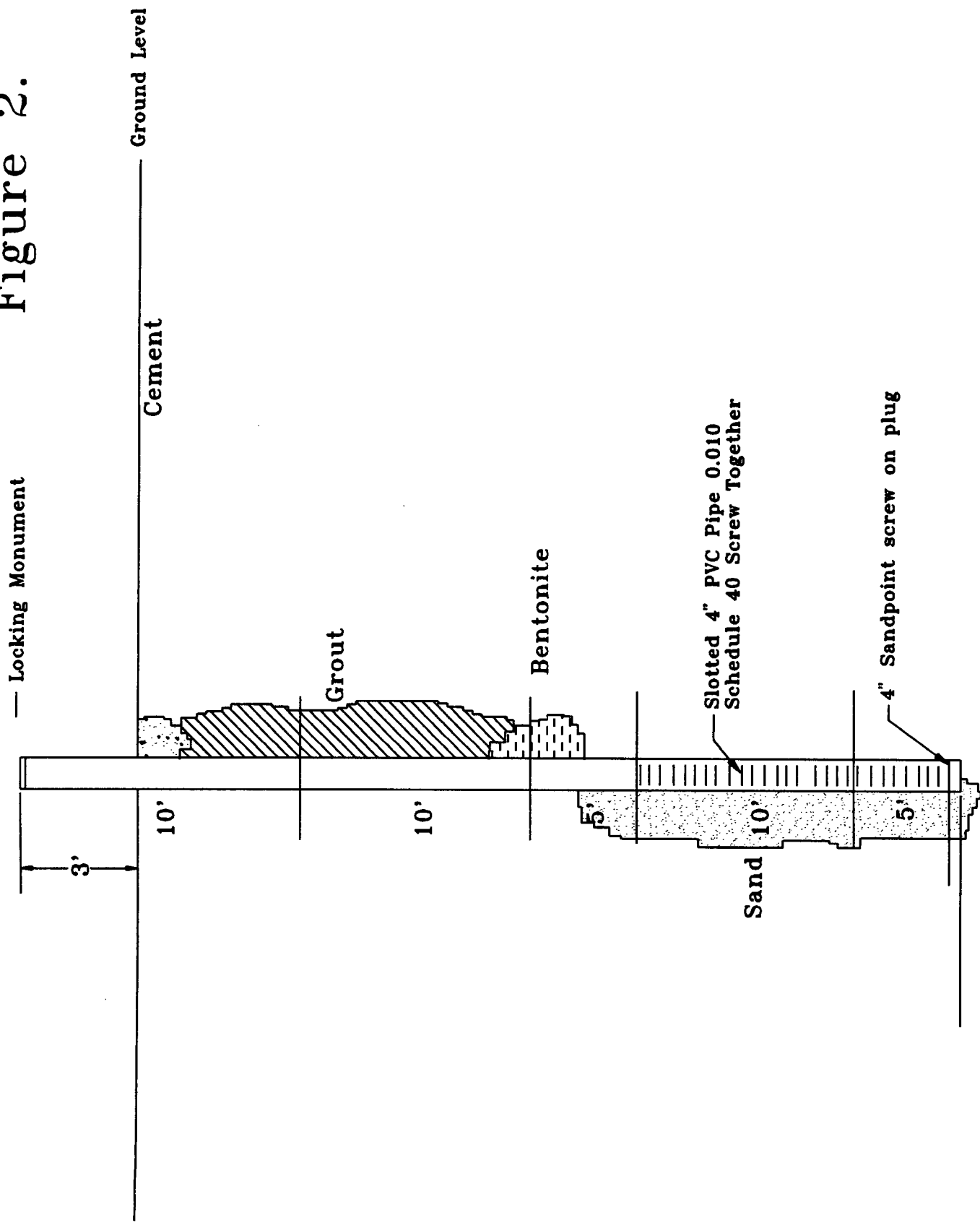


Figure 1.

Figure 2.



During the drilling operations, soil samples were gathered approximately every 5' of depth. Samples were collected from split-spoon samplers driven 24" into the soil. The soil was placed in baggies and tested with the PID Meter for hydrocarbons. The depth to water from the top of the casing riser measured 20'-11 5/8". Considering the height of the riser, that makes the first measured depth to groundwater approximately 18'.

#### Field Test Data

Field data collected during the drilling process included soil samples tested with a Photo-Ionization Detector (PID) Meter. The field data gathered is presented in the following Table.

Table 1-1.

Sample No.	Depth	PID(PPM)
1	3.5-5.5'	7.8
2	8.5-10.5'	1.5
3	13.5-15.5'	8.0
4	18.5-20.5'	7.1

Water encountered next sampling interval

#### Laboratory Data

The laboratory data gathered is summarized in the following Table. Individual laboratory reports are attached for your viewing.

Table 1-2.

Sample No.	Description	(Units)	
Fed6-404	BTEX EPA Method 602.2	B	ND PPB
		T	ND PPB
		E	ND PPB
		X	1.08 PPB
Fed6-405	Metals EPA Method 600/4	Arsenic	<0.005 PPM
		Barium	<0.25 PPM
		Cadmium	<0.002 PPM
		Chromium	<0.02 PPM
		Lead	<0.005 PPM
		Mercury	<0.001 PPM
		Selenium	<0.006 PPM
Fed6-406	Cation / Anion EPA Method 8310	Silver	<0.01 PPM
		Total Hardness	101 PPM
		Calcium	28.3 PPM
		Magnesium	7.36 PPM
		Potassium	<5.0 PPM
		Sodium	780 PPM
		Iron	0.05 PPM
		Total Alkalinity	497 PPM
		Bicarbonate	497 PPM

Cation / Anion Difference = 3.82

Chloride	20.0	PPM
Sulfate	1,360	PPM

Fed6-407	Polynuclear Aromatic Hydrocarbons	Acenaphthene	<2.13	PPB
		Acenaphthylene	<3.74	PPB
		Anthracene	<1.49	PPB
		Benzo(a)anthracene	<0.88	PPB
		Benzo(a)pyrene	<0.39	PPB
		Benzo(b)fluoranthene	<0.19	PPB
		Benzo(k)Fluoranthene	<0.34	PPB
		Benzo(ghi)perylene	<1.23	PPB
		Chrysene	<0.88	PPB
		Dibenzo(a,h)anthracene	<0.72	PPB
		Fluoranthene	<0.15	PPB
		Fluorene	<1.29	PPB
		Indeno(1,2,3-cd)pyrene	<1.05	PPB
		Naphthalene	<5.82	PPB
		Phenanthrene	<1.22	PPB
		Pyrene	<0.13	PPB

### Conclusions

Water data for BTEX was below New Mexico Drinking Water Standards as outlined in NMED Drinking Water Regulations (Title 20, Chapter 7, Part 1). Large numbers were found in the following concentrations, Sodium, Alkalinity, Sulfate. These values are to be considered normal for water found in a wash bottom such as this.

### Recommendations

As confirmed with NMOCD, CES recommends that a second interval of BTEX water analyses should be collected from the monitor well within 60 days. If the BTEX concentration is below groundwater standards as found in this first interval, the monitoring well should be grouted to the surface and abandoned. "No Further Action" would be applied for to NMOCD for groundwater remediation. The contaminated soil in the soil farm should be regularly tilled as the weather warms until it has been reduced to less than 100 PPM from a laboratory TPH analysis. The excavation could then be backfilled and a "Closure Package" prepared for distribution to NMOCD.

Contract Environmental Services, Inc. appreciates this opportunity to present this letter report on the Federal # 6-32 to Louis Dreyfus Natural Gas. If you have questions or require additional information, please don't hesitate to contact our offices at (505) 325-1198 or stop by at 4200 Hawkins Road, Farmington.

Sincerely,



Shawn A. Adams  
Contract Environmental Services, Inc.

**PURGEABLE AROMATICS**

Contract Environmental Services, Inc.

Project ID: Largo Wells  
Sample ID: 404 - 407  
Lab ID: 2066  
Sample Matrix: Water  
Preservative: Cool  
Condition: Intact

Report Date: 12/09/95  
Date Sampled: 12/05/95  
Date Received: 12/05/95  
Date Analyzed: 12/08/95

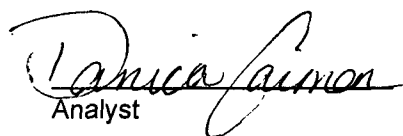
Target Analyte	Concentration (ug/L)	Detection Limit (ug/L)
Benzene	ND	0.50
Toluene	ND	0.50
Ethylbenzene	ND	0.50
m,p-Xylenes	1.08	1.00
o-Xylene	ND	0.50
Total BTEX		1.08

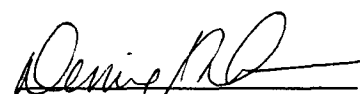
ND - Analyte not detected at the stated detection limit.

<b>Quality Control:</b>	<u>Surrogate</u>	<u>Percent Recovery</u>	<u>Acceptance Limits</u>
	Trifluorotoluene	100	88 - 110%
	Bromofluorobenzene	86	86 - 115%

**Reference:** Method 602.2, Purgeable Aromatics; Federal Register, Vol. 49, No. 209, Oct. 1984.

**Comments:**

  
Analyst

  
Review

**Total Metals Analysis**  
**Contract Environmental Services, Inc.**

Project ID:	Largo Wells	Date Reported:	01/09/96
Sample ID:	404 - 407	Date Sampled:	12/05/95
Laboratory ID:	2066	Time Sampled:	NA
Sample Matrix:	Water	Date Received:	12/05/95


Parameter	Analytical Result (mg/L)	Units
-----------	-----------------------------	-------

**Trace Metals**

Arsenic.....	< 0.005	mg/L
Barium.....	< 0.25	mg/L
Cadmium.....	< 0.002	mg/L
Chromium.....	< 0.02	mg/L
Lead.....	< 0.005	mg/L
Mercury.....	< 0.001	mg/L
Selenium.....	0.006	mg/L
Silver.....	< 0.01	mg/L

**Reference:** U.S.E.P.A. 600/4-79-020, Methods for Chemical Analysis of Water and Wastes, 1983.  
Standard Methods For The Examination Of Water And Wastewater, 18th ed., 1992.

**Comments:**

  
Review

## API Suite

### Contract Environmental Services, Inc.

Project ID: Largo Wells  
 Sample ID: 404 - 407  
 Laboratory ID: 2066  
 Sample Matrix: Water

Date Reported: 01/09/96  
 Date Sampled: 12/05/95  
 Time Sampled: NA  
 Date Received: 12/05/95

Parameter	Analytical Result	Units
<b>General</b>		
Lab pH.....	7.8	s.u.
Lab Conductivity @ 25° C.....	3,590	µmhos/cm
Total Dissolved Solids @ 180°C.....	2,530	mg/L
Total Dissolved Solids (Calc).....	2,500	mg/L
Specific Gravity.....	1.005	***
<b>Anions</b>		
Total Alkalinity as CaCO <sub>3</sub> .....	497	mg/L
Bicarbonate Alkalinity as CaCO <sub>3</sub> .....	497	mg/L
Carbonate Alkalinity as CaCO <sub>3</sub> .....	NA	mg/L
Hydroxide Alkalinity as CaCO <sub>3</sub> .....	NA	mg/L
Chloride.....	20.0	mg/L
Sulfate.....	1,360	mg/L
Nitrate + Nitrite - N.....	NA	
Nitrate - N.....	NA	
Nitrite - N.....	NA	
<b>Cations</b>		
Total Hardness as CaCO <sub>3</sub> .....	101	mg/L
Calcium.....	28.3	mg/L
Magnesium.....	7.36	mg/L
Potassium.....	< 5.0	mg/L
Sodium.....	780	mg/L
Iron.....	0.05	mg/L
<b>Data Validation</b>		<u>Acceptance Level</u>
Cation/Anion Difference.....	3.82	+/- 5 %
TDS (180):TDS (calculated).....	1.0	1.0 - 1.2

**Reference** U.S.E.P.A. 600/4-79-020, Methods for Chemical Analysis of Water and Wastes, 1983.  
Standard Methods For The Examination Of Water And Wastewater, 18th ed., 1992.

Review



## Polyaromatic Hydrocarbons EPA Method 8310

### Contract Environmental Services, Inc.

Project ID: Largo Wells  
Sample ID: 404 - 407  
Lab ID: 2066  
Sample Matrix: Water  
Preservative: Cool  
Condition: Intact

Report Date: 01/05/96  
Date Sampled: 12/05/95  
Date Received: 12/05/95  
Date Extracted: 12/11/95  
Date Analyzed: 12/21/95

Target Analyte	Concentration (µg/L)
Acenaphthene	< 2.13
Acenaphthylene	< 3.74
Anthracene	< 1.49
Benzo(a)anthracene	< 0.88
Benzo(a)pyrene	< 0.39
Benzo(b)fluoranthene	< 0.19
Benzo(k)fluoranthene	< 0.34
Benzo(ghi)perylene	< 1.23
Chrysene	< 0.88
Dibenzo(a,h)anthracene	< 0.72
Fluoranthene	< 0.15
Fluorene	< 1.29
Indeno(1,2,3-cd)pyrene	< 1.05
Naphthalene	< 5.82
Phenanthrene	< 1.22
Pyrene	< 0.13

Reference: EPA Method 8310: Polynuclear Aromatic Hydrocarbons .

  
Review

## CHAIN OF CUSTODY

[illegible]

**ENCLOSURE #2**

**PIT EXCAVATION DATA**

**FEDERAL 6-32**

**Contract Environmental Services, Inc.**  
**Post Office Box 505**  
**Kirtland, New Mexico 87417-0505**  
**Phone (505) 325-1198**

October 19, 1995

New Mexico Oil Conservation Division  
Mr. Bill Olson  
2400 Pacheco Street  
Santa Fe, New Mexico 85730

RE: Louis Dreyfus Natural Gas Corporation, Federal #6-32, Sec 6, T26N, R07W SW/NE, Rio  
Arriba County, New Mexico

Dear Mr. Olson,

Contract Environmental Services, Inc. (CES) is pleased to present this "Plan of Action" for the Federal # 6-32 well location on behalf of Louis Dreyfus Natural Gas Corporation (LDNG). This plan contains background information, current site assessment data, a site plan, conclusions and a "Plan of Action".

**Background Information**

On October 4, 1995 CES began excavating the soil immediately below the earthen pit. As soils were removed from the excavation, periodic samples were gathered to be analyzed using a Photo-Ionization Detector (PID) meter. Soils removed were transferred to another portion of the wellpad to establish a soil farm for continued remediation. These soils were spread on the wellpad some 6" to 12" in depth to allow for aeration and the release of volatile aromatic hydrocarbons.

Approximately 70 cubic yards of contaminated soil was removed from the pit area during the excavation process. At a depth of 17' a field PID soil sample indicated that the contaminated soil had not been removed. A confirmation laboratory soil sample was gathered to be processed for Total Petroleum Hydrocarbons (TPH) using EPA Method 418.1. This laboratory soil analysis confirmed that uncontaminated soil had not been reached. The remainder of the pit area was "Cleaned Out" to this same depth. It is anticipated that not all contamination was removed from the walls of the excavation. On the north side of the excavation a subsurface flow line prevents removing all contaminated material. On the east side a berm and fence around storage tanks prevents further excavation in that direction. The separator was located on the west side of the excavation. Underground lines and surface equipment prevented further excavation in at least three of the four directions. Leaving the excavation open for an extended period of time will enable the contaminate wall soil to remediate as well.

The following is field PID data collected during the removal process.

## Center Of Earthen Pit

### PID Field Data Collected

<u>Depth</u>	<u>Sample No.</u>	<u>PID(PPM)</u>	<u>Location</u>
4'	#1	2000+	Center of Pit
6'	#2	2000+	Center of Pit
10'	#3	2000+	Center of Pit
14'	#4	2000+	Center of Pit
17'	#5	2000+	Center of Pit

### Laboratory Data Collected

<u>Depth</u>	<u>Sample No.</u>	<u>PID(PPM)</u>	<u>Location</u>
17'	FED6-100	3,050	Northeast Corner

### Conclusions

Soil contamination continued beyond the digging ability of the equipment used. Remaining wall contamination will remediate while the excavation remains open during the soil farm remediation process. CES believes that LDNG has not removed the majority of the contaminated soil or sufficiently defined the vertical extent. CES ranks this site at 100 PPM cleanup score with a maximum benzene level of 10 PPM. The amount of impact to the groundwater is unknown at this point.

### Plan of Action

Continue removing the contaminated soils from the excavation, move in a lateral direction testing the excavation walls as the digging proceeds. Remove the contamination in the excavation walls until the PID Meter indicates below 100 PPM. Remediate the soils contained in the soil farm to below 100 PPM laboratory TPH by EPA Method 418.1 or 8015 Modified for gas and diesel. Auger in a monitor well approximately 5' into the groundwater in a downgradient direction from the excavation. A water sample will be collected from this monitor well after the standard 3 volumes of water have been extracted. The water sample will be analyzed for Benzene, Toluene, Ethylbenzene and Xylenes (BTEX) using EPA Method 8020. Return the remediated soils to the pit area as backfill and slightly dome the area to prevent water ponding. In addition, the soils will be checked for contamination approximately every 4' during the drilling process while installing the monitor well. A report on the finding will be presented to NMOCD for their records.

Contract Environmental Services, Inc. appreciates this opportunity to present this "Plan of Action" on behalf of Louis Dreyfus Natural Gas Corporation. If you have questions or require additional information, please don't hesitate to contact our offices at (505) 325-1198 or stop by at 4200 Hawkins Road, Farmington.

Sincerely,

Shawn A. Adams  
Contract Environmental Services, Inc.

cc: Mr. Denny Foust, NMOCD Farmington  
Mr. Bill Liese, BLM Farmington



OFF: (505) 325-5667



LAB: (505) 325-1556

**TOTAL PETROLEUM HYDROCARBONS**

Attn: **Shawn Adams**  
Company: **Contract Environmental Services, Inc.**  
Address: **P.O. Box 505**  
City, State: **Kirtland, NM 87417**

Date: **27-Sep-96**  
COC No.: **4307**  
Sample No. **12358**  
Job No. **2-1000**

Project Name: **Federal #6-32**  
Project Location: **FED-600**  
Sampled by: **SA**  
Analyzed by: **HR**  
Sample Matrix: **Soil**

Date: **26-Sep-96** Time: **15:30**  
Date: **27-Sep-96**

**Laboratory Analysis**

<i>Parameter</i>	<i>Result</i>	<i>Detection Limit</i>	<i>Unit of Measure</i>	<i>Method</i>
<i>Total Petroleum Hydrocarbons, TPH</i>	<b>1779</b>	<b>25</b>	<b>mg/kg</b>	<b>EPA Method 418.1</b>

**Quality Assurance Report**

**Laboratory Fortified Blank/Spike Soil**

<i>Laboratory Identification</i>	<i>Analyzed Value</i>	<i>Acceptable Range</i>	<i>Unit of Measure</i>
<i>Laboratory Fortified Blank Soil - QCBS2</i>	<b>&lt; 25</b>	<b>&lt; 25</b>	<b>mg/kg</b>
<i>Laboratory Fortified Spike Soil - QCSS1</i>	<b>893</b>	<b>828 - 1024</b>	<b>mg/kg</b>

**Duplication**

<i>Laboratory Identification</i>	<i>( % RSD )</i>	<i>Limit ( % RSD )</i>
<b>12357-4307</b>	<b>1.7</b>	<b>15.0</b>

Approved by: *JaG*  
Date: **9/30/96**

OFF: (505) 325-5667



LAB: (505) 325-1556

### AROMATIC VOLATILE ORGANICS

Attn: **Shawn Adams**  
Company: **Contract Environmental Services, Inc.**  
Address: **P.O. Box 505**  
City, State: **Kirtland, NM 87417**

Date: **1-Oct-96**  
COC No.: **4307**  
Sample No. **12358**  
Job No. **2-1000**


Project Name: **Federal #6-32**  
Project Location: **FED-600**  
Sampled by: **SA**  
Analyzed by: **DC**  
Sample Matrix: **Soil**

Date: **26-Sep-96** Time: **15:30**  
Date: **30-Sep-96**

#### Laboratory Analysis

Parameter	Result	Units of Measure	Detection Limit	Units of Measure
Benzene	<0.2	ug/kg	0.2	ug/kg
Toluene	2.5	ug/kg	0.2	ug/kg
Ethylbenzene	1.5	ug/kg	0.2	ug/kg
m,p-Xylene	2.2	ug/kg	0.2	ug/kg
o-Xylene	0.6	ug/kg	0.2	ug/kg
TOTAL		6.8		ug/kg

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

Approved by:   
Date: **10/1/96**

P.O. BOX 2606 • FARMINGTON, NM 87499

- TECHNOLOGY BLENDING INDUSTRY WITH THE ENVIRONMENT -



OFF: (505) 325-5667



LAB: (505) 325-1556

### AROMATIC VOLATILE ORGANICS

Attn: **Shawn Adams**  
Company: **Contract Environmental Services, Inc.**  
Address: **P.O. Box 505**  
City, State: **Kirtland, NM 87417**

Date: **1-Oct-96**  
COC No.: **4307**  
Sample No. **12358**  
Job No. **2-1000**


Project Name: **Federal #6-32**  
Project Location: **FED-600**  
Sampled by: **SA**  
Analyzed by: **DC**  
Sample Matrix: **Soil**

Date: **26-Sep-96** Time: **15:30**  
Date: **30-Sep-96**

#### Laboratory Analysis

Parameter	Result	Units of Measure	Detection Limit	Units of Measure
Benzene	<0.2	ug/kg	0.2	ug/kg
Toluene	2.5	ug/kg	0.2	ug/kg
Ethylbenzene	1.5	ug/kg	0.2	ug/kg
m,p-Xylene	2.2	ug/kg	0.2	ug/kg
o-Xylene	0.6	ug/kg	0.2	ug/kg
	<b>TOTAL</b>	<b>6.8</b>		<b>ug/kg</b>

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

Approved by:   
Date: **10/1/96**

OFF: (505) 325-5667



LAB: (505) 325-1556

**QUALITY ASSURANCE REPORT**  
for EPA Method 8020

Date Analyzed: 30-Sep-96

Internal QC No.: 0486-QC

Surrogate QC No.: 0488-QC

Reference Standard QC No.: 0417-QC

**Method Blank**

Analyte	Result	Units of Measure
Average Amount of All Analytes In Blank	<0.2	ppb

**Calibration Check**

Analyte	Units of Measure	True Value	Analyzed Value	% Diff	Limit
Benzene	ppb	20.0	19.9	1	15%
Toluene	ppb	20.0	19.6	2	15%
Ethylbenzene	ppb	20.0	19.7	1	15%
m,p-Xylene	ppb	40.0	37.9	5	15%
o-Xylene	ppb	20.0	18.7	7	15%

**Matrix Spike**

Analyte	1 - Percent Recovered	2 - Percent Recovered	Limit	%RSD	Limit
Benzene	109	111	(39-150)	1	20%
Toluene	80	83	(46-148)	1	20%
Ethylbenzene	102	104	(32-160)	1	20%
m,p-Xylene	88	90	(35-145)	1	20%
o-Xylene	92	94	(35-145)	1	20%

**Surrogate Recoveries**

Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered	Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered
Limit Percent Recovery	(70-130)		Limit Percent Recovery	(70-130)	
S1: Fluorobenzene			S1: Fluorobenzene		
12357-4307	93				
12358-4307	93				

**ENCLOSURE #3**

**SOIL FARM DATA**

**FEDERAL 6-32**

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

Distribution: White – On Site	Yellow – LAB	Pink – Sampler	Goldenrod – Client
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OFF: (505) 325-5667



LAB: (505) 325-1556

## ANALYTICAL REPORT

Date: 30-Jun-98

<b>Client:</b>	Contract Environmental Services, Inc.	<b>Client Sample Info:</b>	Federal 6-32
<b>Work Order:</b>	9806081	<b>Client Sample ID:</b>	F632-301 Soil Farm North
<b>Lab ID:</b>	9806081-02A	<b>Matrix:</b>	SOIL
<b>Project:</b>	Soil Farms	<b>Collection Date:</b>	6/18/98 10:35:00 AM
		<b>COC Record:</b>	5155

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
<b>DIESEL RANGE ORGANICS</b>		<b>SW8015</b>				Analyst: HR
T/R Hydrocarbons: C10-C28	140	25		mg/Kg	1	6/29/98
<b>GASOLINE RANGE ORGANICS</b>		<b>SW8015</b>				Analyst: DC
T/R Hydrocarbons: C6-C10	ND	0.18		mg/Kg	1	6/23/98

**Qualifiers:**

PQL - Practical Quantitation Limit

ND - Not Detected at Practical Quantitation Limit

J - Analyte detected below Practical Quantitation Limit

B - Analyte detected in the associated Method Blank

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

E - Value above quantitation range

Surr: - Surrogate

1 of 1

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- TECHNOLOGY BLENDING INDUSTRY WITH THE ENVIRONMENT -

OFF: (505) 325-5667



LAB: (505) 325-1556

## ANALYTICAL REPORT

Date: 30-Jun-98

**Client:** Contract Environmental Services, Inc.  
**Work Order:** 9806081  
**Lab ID:** 9806081-01A    **Matrix:** SOIL  
**Project:** Soil Farms

**Client Sample Info:** Federal 6-32  
**Client Sample ID:** F632-300 Soil Farm South  
**Collection Date:** 6/18/98 10:30:00 AM  
**COC Record:** 5155

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
<b>DIESEL RANGE ORGANICS</b>		<b>SW8015</b>				Analyst: HR
T/R Hydrocarbons: C10-C28	50	25		mg/Kg	1	6/27/98
<b>GASOLINE RANGE ORGANICS</b>		<b>SW8015</b>				Analyst: DC
T/R Hydrocarbons: C6-C10	ND	0.18		mg/Kg	1	6/23/98

**Qualifiers:** PQL - Practical Quantitation Limit  
ND - Not Detected at Practical Quantitation Limit  
J - Analyte detected below Practical Quantitation Limit  
B - Analyte detected in the associated Method Blank

S - Spike Recovery outside accepted recovery limits  
R - RPD outside accepted recovery limits  
E - Value above quantitation range  
Surr: - Surrogate

1 of 1

P.O. BOX 2606 • FARMINGTON, NM 87499

- TECHNOLOGY BLENDING INDUSTRY WITH THE ENVIRONMENT -

On Site Technologies, LTD.

Date: 24-Sep-99

CLIENT: Contract Environmental Services, Inc.  
Work Order: 9806081  
Project: Soil Farms

QC SUMMARY REPORT  
Method Blank

Sample ID: MB1	Batch ID: GC-2_980626	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/26/98	Prep Date: 6/26/98
Client ID:	9806081	Run ID: GC-2_980626B	SeqNo: 3630		
Analyte	Result	POL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C10-C28	ND	25			

Qualifiers: ND - Not Detected at the Reporting Limit  
S - Spike Recovery outside accepted recovery limits  
J - Analyte detected below quantitation limits  
R - RPD outside accepted recovery limits  
B - Analyte detected in the associated Method Blank

# On Site Technologies, LTD.

Date: 24-Sep-99

**CLIENT:** Contract Environmental Services, Inc.  
**Work Order:** 9806081  
**Project:** Soil Farms

## QC SUMMARY REPORT

Sample Duplicate

Sample ID: 9806075-04AD	Batch ID: GC-2_980626	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/27/98	Prep Date: 6/27/98						
Client ID:	9806081	Run ID: GC-2_980626B	SeqNo: 3653								
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
T/R Hydrocarbons: C10-C28	1844	25	0	0	0.0%	0	0	1790	3.0%	15	

**Qualifiers:** ND - Not Detected at the Reporting Limit  
 J - Analyte detected below quantitation limits  
 S - Spike Recovery outside accepted recovery limits  
 R - RPD outside accepted recovery limits  
 B - Analyte detected in the associated Method Blank



# On Site Technologies, LTD.

Date: 24-Sep-99

CLIENT: Contract Environmental Services, Inc.  
Work Order: 9806081  
Project: Soil Farms

## QC SUMMARY REPORT Sample Matrix Spike

Sample ID: 9806074-06AMS	Batch ID: GC-2_980626	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/29/98	Prep Date: 6/29/98
Client ID: 9806081	Run ID: GC-2_980626B	SeqNo: 3654			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C10-C28	527.2	25	502	0	105.0% 70 130

Qualifiers: ND - Not Detected at the Reporting Limit S - Spike Recovery outside accepted recovery limits B - Analyte detected in the associated Method Blank  
J - Analyte detected below quantitation limits R - RPD outside accepted recovery limits

# On Site Technologies, LTD.

Date: 24-Sep-99

**CLIENT:** Contract Environmental Services, Inc.  
**Work Order:** 9806081  
**Project:** Soil Farms

## QC SUMMARY REPORT

Laboratory Control Spike - generic

Sample ID: LCS	Batch ID: GC-2_980626	Test Code: SW8015B	Units: mg/kg	Analysis Date: 6/27/98	Prep Date: 6/26/98
Client ID:	9806081	Run ID: GC-2_980626B		SeqNo: 3632	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C10-C28	529.9	25	502	0	105.6% 70 130

### Qualifiers:

ND - Not Detected at the Reporting Limit  
J - Analyte detected below quantitation limits  
S - Spike Recovery outside accepted recovery limits  
R - RPD outside accepted recovery limits  
B - Analyte detected in the associated Method Blank

# On Site Technologies, LTD.

Date: 24-Sep-99

**CLIENT:** Contract Environmental Services, Inc.  
**Work Order:** 9806081  
**Project:** Soil Farms

## QC SUMMARY REPORT

Continuing Calibration Verification Standard

Sample ID: CCV1 QC0602	Batch ID: GC-2_980626	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/26/98	Prep Date:
Client ID:	9806081	Run ID: GC-2_980626B		SeqNo: 3631	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDlimit Qual
T/R Hydrocarbons: C10-C28	492.9	25	502	0	98.2% 85 115
Sample ID: CCV2 QC0602	Batch ID: GC-2_980626	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/27/98	Prep Date:
Client ID:	9806081	Run ID: GC-2_980626B		SeqNo: 3655	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDlimit Qual
T/R Hydrocarbons: C10-C28	522.5	25	502	0	104.1% 85 115
Sample ID: CCV3 QC0602	Batch ID: GC-2_980626	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/27/98	Prep Date:
Client ID:	9806081	Run ID: GC-2_980626B		SeqNo: 3656	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDlimit Qual
T/R Hydrocarbons: C10-C28	490	25	502	0	97.6% 85 115
Sample ID: CCV4 QC0602	Batch ID: GC-2_980626	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/29/98	Prep Date:
Client ID:	9806081	Run ID: GC-2_980626B		SeqNo: 3657	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDlimit Qual
T/R Hydrocarbons: C10-C28	545.9	25	502	0	108.7% 85 115
Sample ID: CCV5 QC0602	Batch ID: GC-2_980626	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/29/98	Prep Date:
Client ID:	9806081	Run ID: GC-2_980626B		SeqNo: 3658	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDlimit Qual
T/R Hydrocarbons: C10-C28	520.2	25	502	0	103.6% 85 115

**Qualifiers:** ND - Not Detected at the Reporting Limit  
S - Spike Recovery outside accepted recovery limits  
B - Analyte detected in the associated Method Blank  
J - Analyte detected below quantitation limits  
R - RPD outside accepted recovery limits

On Site Technologies, LTD.

Date: 24-Sep-99

CLIENT: Contract Environmental Services, Inc.  
Work Order: 9806081  
Project: Soil Farms

QC SUMMARY REPORT  
Method Blank

Sample ID: MB1	Batch ID: GC-1_980623	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/23/98	Prep Date:
Client ID:	9806081	Run ID: GC-1_980623A		SeqNo: 3474	
Analyte	Result	POL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C6-C10	.026	0.18			J

Qualifiers: NID - Not Detected at the Reporting Limit  
J - Analyte detected below quantitation limits

S - Spike Recovery outside accepted recovery limits  
R - RPD outside accepted recovery limits

B - Analyte detected in the associated Method Blank

# On Site Technologies, LTD.

Date: 24-Sep-99

**CLIENT:** Contract Environmental Services, Inc.  
**Work Order:** 9806081  
**Project:** Soil Farms

## QC SUMMARY REPORT

Sample Matrix Spike

Sample ID: 9806087-02AMS		Batch ID: GC-1_980623	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/23/98	Prep Date:
Client ID:		9806081	Run ID: GC-1_980623A		SeqNo: 3498	
Analyte	Result	POL	SPK value	SPK Ref Val	%REC	LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C6-C10		1.496	0.18	1.801	0	83.1% 52 123
Sample ID: 9806087-02AMS		Batch ID: GC-1_980623	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/23/98	Prep Date:
Client ID:		9806081	Run ID: GC-1_980623A		SeqNo: 3499	
Analyte	Result	POL	SPK value	SPK Ref Val	%REC	LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C6-C10		1.395	0.18	1.801	0	77.5% 52 123 1.496 7.0% 14

**Qualifiers:** ND - Not Detected at the Reporting Limit  
J - Analyte detected below quantitation limits  
S - Spike Recovery outside accepted recovery limits  
R - RPD outside accepted recovery limits  
B - Analyte detected in the associated Method Blank

# On Site Technologies, LTD.

Date: 24-Sep-99

**CLIENT:** Contract Environmental Services, Inc.  
**Work Order:** 9806081  
**Project:** Soil Farms

## QC SUMMARY REPORT

Laboratory Control Spike - generic

Sample ID: LCS	Batch ID: GC-1_980623	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/23/98	Prep Date:
Client ID:	9806081	Run ID: GC-1_980623A		SeqNo: 3476	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C6-C10	1.851	0.18	1.801	0.03	101.1% 52 123

**Qualifiers:** ND - Not Detected at the Reporting Limit S - Spike Recovery outside accepted recovery limits B - Analyte detected in the associated Method Blank  
J - Analyte detected below quantitation limits R - RPD outside accepted recovery limits

# On Site Technologies, LTD.

Date: 24-Sep-99

CLIENT: Contract Environmental Services, Inc.  
Work Order: 9806081  
Project: Soil Farms

## QC SUMMARY REPORT

Continuing Calibration Verification Standard

Sample ID: CCV1 QC0593	Batch ID: GC-1_980623	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/23/98	Prep Date:
Client ID: 9806081	Run ID: GC-1_980623A			SeqNo: 3475	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDlimit Qual
T/R Hydrocarbons: C6-C10	1.835	0.18	1.801	0	101.9% 85 115
Trifluorotoluene	.0769	0	0.08	0	96.1% 70 130
Sample ID: CCV2 QC0593	Batch ID: GC-1_980623	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/23/98	Prep Date:
Client ID: 9806081	Run ID: GC-1_980623A			SeqNo: 3489	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDlimit Qual
T/R Hydrocarbons: C6-C10	1.686	0.18	1.801	0	93.6% 85 115
Trifluorotoluene	.0777	0	0.08	0	97.1% 70 130
Sample ID: CCV3 QC0593	Batch ID: GC-1_980623	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/23/98	Prep Date:
Client ID: 9806081	Run ID: GC-1_980623A			SeqNo: 3497	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDlimit Qual
T/R Hydrocarbons: C6-C10	1.525	0.18	1.801	0	84.7% 85 115
Trifluorotoluene	.0754	0	0.08	0	94.2% 70 130
Sample ID: CCV4 QC0593	Batch ID: GC-1_980623	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/23/98	Prep Date:
Client ID: 9806081	Run ID: GC-1_980623A			SeqNo: 3500	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDlimit Qual
T/R Hydrocarbons: C6-C10	1.806	0.18	1.801	0	100.3% 85 115
Trifluorotoluene	.0756	0	0.08	0	94.5% 70 130

5 confirmed  
w/ CCV4  
9/24/99

Qualifiers: ND - Not Detected at the Reporting Limit S - Spike Recovery outside accepted recovery limits B - Analyte detected in the associated Method Blank  
J - Analyte detected below quantitation limits R - RPD outside accepted recovery limits

Purchase Order No.:		Project No.			
Name		Company		Mailing Address	
City, State, Zip		Telephone No.		Telefax No.	
<b>ANALYSIS REQUESTED</b>					
REPORT TO RESULTS TO		Number of Containers		LAB ID	
SAMPLER'S SIGNATURE:		DATE		SAMPLE TIME	
PROJECT LOCATION:		SAMPLE IDENTIFICATION		PRES.	
SAMPLER'S SIGNATURE:		DATE		SAMPLE TIME	
PROJECT LOCATION:		SAMPLE IDENTIFICATION		PRES.	
SAMPLER'S SIGNATURE:		DATE		SAMPLE TIME	
PROJECT LOCATION:		SAMPLE IDENTIFICATION		PRES.	
SAMPLER'S SIGNATURE:		DATE		SAMPLE TIME	
PROJECT LOCATION:		SAMPLE IDENTIFICATION		PRES.	
SAMPLER'S SIGNATURE:		DATE		SAMPLE TIME	
PROJECT LOCATION:		SAMPLE IDENTIFICATION		PRES.	
SAMPLER'S SIGNATURE:		DATE		SAMPLE TIME	
PROJECT LOCATION:		SAMPLE IDENTIFICATION		PRES.	
SAMPLER'S SIGNATURE:		DATE		SAMPLE TIME	
PROJECT LOCATION:		SAMPLE IDENTIFICATION		PRES.	
SAMPLER'S SIGNATURE:		DATE		SAMPLE TIME	
PROJECT LOCATION:		SAMPLE IDENTIFICATION		PRES.	
SAMPLER'S SIGNATURE:		DATE		SAMPLE TIME	
PROJECT LOCATION:		SAMPLE IDENTIFICATION		PRES.	
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PROJECT LOCATION:		SAMPLE IDENTIFICATION		PRES.	
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SAMPLER'S SIGNATURE:		DATE		SAMPLE TIME	
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PROJECT LOCATION:		SAMPLE IDENTIFICATION		PRES.	
SAMPLER'S SIGNATURE:		DATE		SAMPLE TIME	
PROJECT LOCATION:		SAMPLE IDENTIFICATION		PRES.	
SAMPLER'S SIGNATURE:		DATE		SAMPLE TIME	
PROJECT LOCATION:		SAMPLE IDENTIFICATION		PRES.	
SAMPLER'S SIGNATURE:		DATE		SAMPLE TIME	
PROJECT LOCATION:		SAMPLE IDENTIFICATION		PRES.	
SAMPLER'S SIGNATURE:		DATE		SAMPLE TIME	
PROJECT LOCATION:		SAMPLE IDENTIFICATION		PRES.	
SAMPLER'S SIGNATURE:		DATE		SAMPLE TIME	
PROJECT LOCATION:		SAMPLE IDENTIFICATION		PRES.	
SAMPLER'S SIGNATURE:		DATE		SAMPLE TIME	



OFF: (505) 325-5667



LAB: (505) 325-1556

## ANALYTICAL REPORT

Date: 06-Dec-99

<b>Client:</b>	Louis Dreyfus Natural Gas	<b>Client Sample Info:</b>	Landfarm
<b>Work Order:</b>	9911023	<b>Client Sample ID:</b>	Fed 6-32 Composite (#1/#2/#3)
<b>Lab ID:</b>	9911023-02A	<b>Matrix:</b>	SOIL
<b>Project:</b>	Landfarms	<b>Collection Date:</b>	11/12/99
		<b>COC Record:</b>	10421-10422

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
<b>DIESEL RANGE ORGANICS</b>		<b>SW8015B</b>				Analyst: <b>DM</b>
T/R Hydrocarbons: C10-C28	ND	25		mg/Kg	1	11/24/99
<b>GASOLINE RANGE ORGANICS</b>		<b>SW8015B</b>				Analyst: <b>DC</b>
T/R Hydrocarbons: C6-C10	ND	0.18		mg/Kg	1	11/16/99
<b>GASOLINE RANGE ORGANICS</b>		<b>SW8015B</b>				Analyst: <b>DM</b>
Benzene	ND	10		µg/Kg	1	11/16/99
Ethylbenzene	ND	10		µg/Kg	1	11/16/99
m,p-Xylene	ND	20		µg/Kg	1	11/16/99
o-Xylene	ND	20		µg/Kg	1	11/16/99
Toluene	ND	30		µg/Kg	1	11/16/99

**Qualifiers:**

PQL - Practical Quantitation Limit

ND - Not Detected at Practical Quantitation Limit

J - Analyte detected below Practical Quantitation Limit

B - Analyte detected in the associated Method Blank

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

E - Value above quantitation range

Surr: - Surrogate

1 of 1

P.O. BOX 2606 • FARMINGTON, NM 87499

- TECHNOLOGY BLENDING INDUSTRY WITH THE ENVIRONMENT -

# On Site Technologies, LTD.

Date: 06-Dec-99

CLIENT: Louis Dreyfus Natural Gas  
Work Order: 9911023  
Project: Landfarms

## QC SUMMARY REPORT Method Blank

Sample ID: MB1	Batch ID: GC-2_991123	Test Code: SW8015B	Units: mg/Kg	Analysis Date 11/23/99	Prep Date: 11/16/99
Client ID: 9911023	Run ID: GC-2_991123A	SeqNo: 21551			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C10-C28	10.53	25			J

Qualifiers: ND - Not Detected at the Reporting Limit S - Spike Recovery outside accepted recovery limits B - Analyte detected in the associated Method Blank  
J - Analyte detected below quantitation limits R - RPD outside accepted recovery limits

# On Site Technologies, LTD.

Date: 06-Dec-99

CLIENT: Louis Dreyfus Natural Gas  
Work Order: 9911023  
Project: Landfarms

## QC SUMMARY REPORT Sample Duplicate

Sample ID: 9911023-01AD	Batch ID: GC-2_991123	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 11/30/99	Prep Date: 11/30/99
Client ID: MKL 5-A Composi	9911023	Run ID: GC-2_991123A		SeqNo: 21573	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C10-C28	1121	25	0	0	0.0% 0 0 970.7 14.4% 24

Qualifiers: ND - Not Detected at the Reporting Limit S - Spike Recovery outside accepted recovery limits B - Analyte detected in the associated Method Blank  
J - Analyte detected below quantitation limits R - RPD outside accepted recovery limits

On Site Technologies, LTD.

Date: 06-Dec-99

CLIENT: Louis Dreyfus Natural Gas  
Work Order: 9911023  
Project: Landfarms

QC SUMMARY REPORT  
Sample Matrix Spike

Sample ID: 9911023-04AMS	Batch ID: GC-2_991123	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 11/30/99	Prep Date: 11/30/99
Client ID: MKL 2-R #1	9911023	Run ID: GC-2_991123A		SeqNo: 21572	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C10-C28	449	25	501.9	0	89.5% 63 126

Qualifiers: ND - Not Detected at the Reporting Limit S - Spike Recovery outside accepted recovery limits B - Analyte detected in the associated Method Blank  
J - Analyte detected below quantitation limits R - RPD outside accepted recovery limits

On Site Technologies, LTD.

Date: 06-Dec-99

CLIENT: Louis Dreyfus Natural Gas  
Work Order: 9911023  
Project: Landfarms

QC SUMMARY REPORT  
Laboratory Control Spike - generic

Sample ID: LCS Soil	Batch ID: GC-2_991123	Test Code: SW8015B	Units: mg/Kg	Analysis Date 11/23/99	Prep Date: 11/16/99
Client ID: 9911023	Run ID: GC-2_991123A	SeqNo: 21553			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C10-C28	529.3	25	501.9	10.53	103.4% 59 126

Qualifiers: ND - Not Detected at the Reporting Limit S - Spike Recovery outside accepted recovery limits B - Analyte detected in the associated Method Blank  
J - Analyte detected below quantitation limits R - RPD outside accepted recovery limits

# On Site Technologies, LTD.

Date: 06-Dec-99

**CLIENT:** Louis Dreyfus Natural Gas  
**Work Order:** 9911023  
**Project:** Landfarms

## QC SUMMARY REPORT

Continuing Calibration Verification Standard

Sample ID: CCV1 DRO_99100	Batch ID: GC-2_991123	Test Code: SW6015B	Units: mg/Kg	Analysis Date 11/23/99	Prep Date:
Client ID: 9911023	Run ID: GC-2_991123A			SeqNo: 21552	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C10-C28	435.6	25	501.9	0	86.8% 85 115
Sample ID: CCV2 DRO_99100	Batch ID: GC-2_991123	Test Code: SW6015B	Units: mg/Kg	Analysis Date 11/23/99	Prep Date:
Client ID: 9911023	Run ID: GC-2_991123A			SeqNo: 21574	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C10-C28	464.4	25	501.9	0	92.5% 85 115
Sample ID: CCV3 DRO_99100	Batch ID: GC-2_991123	Test Code: SW6015B	Units: mg/Kg	Analysis Date 11/24/99	Prep Date:
Client ID: 9911023	Run ID: GC-2_991123A			SeqNo: 21575	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C10-C28	455.3	25	501.9	0	90.7% 85 115
Sample ID: CCV4 DRO_99100	Batch ID: GC-2_991123	Test Code: SW6015B	Units: mg/Kg	Analysis Date 11/24/99	Prep Date:
Client ID: 9911023	Run ID: GC-2_991123A			SeqNo: 21576	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C10-C28	438.5	25	501.9	0	87.4% 85 115
Sample ID: CCV5 DRO_99100	Batch ID: GC-2_991123	Test Code: SW6015B	Units: mg/Kg	Analysis Date 11/29/99	Prep Date:
Client ID: 9911023	Run ID: GC-2_991123A			SeqNo: 21577	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C10-C28	492.2	25	501.9	0	98.1% 85 115

**Qualifiers:** ND - Not Detected at the Reporting Limit S - Spike Recovery outside accepted recovery limits B - Analyte detected in the associated Method Blank  
J - Analyte detected below quantitation limits R - RPD outside accepted recovery limits

**CLIENT:** Louis Dreyfus Natural Gas  
**Work Order:** 9911023  
**Project:** Landfarms

## QC SUMMARY REPORT

Continuing Calibration Verification Standard

Sample ID: CCV6 DRO_99100	Batch ID: GC-2_991123	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 11/29/99	Prep Date:
Client ID: 9911023	Run ID: GC-2_991123A	SeqNo: 21578			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C10-C28	470.4	25	501.9	0	93.7% 85 115
Sample ID: CCV7 DRO_99100	Batch ID: GC-2_991123	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 11/30/99	Prep Date:
Client ID: 9911023	Run ID: GC-2_991123A	SeqNo: 21579			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C10-C28	526.6	25	501.9	0	104.9% 85 115
Sample ID: CCV8 DRO_99100	Batch ID: GC-2_991123	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 11/30/99	Prep Date:
Client ID: 9911023	Run ID: GC-2_991123A	SeqNo: 21580			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C10-C28	528.5	25	501.9	0	105.3% 85 115

**Qualifiers:** ND - Not Detected at the Reporting Limit      S - Spike Recovery outside accepted recovery limits      B - Analyte detected in the associated Method Blank  
J - Analyte detected below quantitation limits      R - RPD outside accepted recovery limits

On Site Technologies, LTD.

Date: 06-Dec-99

CLIENT: Louis Dreyfus Natural Gas  
Work Order: 9911023  
Project: Landfarms

QC SUMMARY REPORT  
Method Blank

Sample ID: MBlank	Batch ID: 8015GRO_S-	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 11/16/99	Prep Date:
Client ID:	9911023	Run ID: GC-1_991116A		SeqNo: 21331	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C6-C10	ND				0.18

Qualifiers:

ND - Not Detected at the Reporting Limit  
S - Spike Recovery outside accepted recovery limits  
B - Analyte detected in the associated Method Blank  
J - Analyte detected below quantitation limits  
R - RPD outside accepted recovery limits



# On Site Technologies, LTD.

Date: 06-Dec-99

CLIENT: Louis Dreyfus Natural Gas  
Work Order: 9911023  
Project: Landfarms

## QC SUMMARY REPORT Sample Matrix Spike

Sample ID: 9911022-01AMS	Batch ID: 8015GRO_S-	Test Code: SW8015B	Units: mg/Kg	Analysis Date 11/16/99	Prep Date:						
Client ID: 9911023	Run ID: GC-1_991116A	SeqNo: 21343									
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
T/R Hydrocarbons: C6-C10	1.537	0.18	1.802	0	85.3%	46	118				
Sample ID: 9911022-01AMS	Batch ID: 8015GRO_S-	Test Code: SW8015B	Units: mg/Kg	Analysis Date 11/16/99	Prep Date:						
Client ID: 9911023	Run ID: GC-1_991116A	SeqNo: 21344									
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
T/R Hydrocarbons: C6-C10	1.496	0.18	1.802	0	83.0%	46	118	1.537	2.7%	12	

Qualifiers: ND - Not Detected at the Reporting Limit  
J - Analyte detected below quantitation limits  
S - Spike Recovery outside accepted recovery limits  
R - RPD outside accepted recovery limits  
B - Analyte detected in the associated Method Blank

On Site Technologies, LTD.

Date: 06-Dec-99

CLIENT: Louis Dreyfus Natural Gas  
Work Order: 9911023  
Project: Landfarms

QC SUMMARY REPORT  
Laboratory Control Spike - generic

Sample ID: LCS Soil	Batch ID: 8015GRO_S-	Test Code: SW8015B	Units: mg/Kg	Analysis Date 11/16/99	Prep Date:
Client ID: 9911023	Run ID: GC-1_991116A	SeqNo: 21333			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C6-C10	1.647	0.18	1.802	0	91.4% 65.9 118

Qualifiers: ND - Not Detected at the Reporting Limit S - Spike Recovery outside accepted recovery limits B - Analyte detected in the associated Method Blank  
J - Analyte detected below quantitation limits R - RPD outside accepted recovery limits

# On Site Technologies, LTD.

Date: 06-Dec-99

**CLIENT:** Louis Dreyfus Natural Gas  
**Work Order:** 9911023  
**Project:** Landfarms

## QC SUMMARY REPORT

Continuing Calibration Verification Standard

Sample ID: CCV1 GRO_99092		Batch ID: 8015GRO_S-	Test Code: SW8015B	Units: mg/Kg	Analysis Date 11/16/99	Prep Date:
Client ID:		9911023	Run ID: GC-1_991116A		SeqNo: 21332	
Analyte	Result	POL	SPK value	SPK Ref Val	%REC	LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C6-C10	1.718	0.18	1.812	0	94.8%	85 115
Trifluorotoluene	.0769	0	0.08	0	96.1%	77 134
Sample ID: CCV2 GRO_99092		Batch ID: 8015GRO_S-	Test Code: SW8015B	Units: mg/Kg	Analysis Date 11/16/99	Prep Date:
Client ID:		9911023	Run ID: GC-1_991116A		SeqNo: 21345	
Analyte	Result	POL	SPK value	SPK Ref Val	%REC	LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C6-C10	1.719	0.18	1.812	0	94.9%	85 115
Trifluorotoluene	.0756	0	0.08	0	94.5%	77 134

**Qualifiers:** ND - Not Detected at the Reporting Limit S - Spike Recovery outside accepted recovery limits B - Analyte detected in the associated Method Blank  
 J - Analyte detected below quantitation limits R - RPD outside accepted recovery limits

On Site Technologies, LTD.

Date: 06-Dec-99

CLIENT: Louis Dreyfus Natural Gas  
Work Order: 9911023  
Project: Landfarms

QCC SUMMARY REPORT  
Method Blank

Sample ID: MBlank	Batch ID: GRO_S-12/2/	Test Code: SW8015B	Units: µg/Kg	Analysis Date 11/16/99	Prep Date:
Client ID: 9911023	Run ID: GC-1_991116B	SeqNo: 21625			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
Benzene	ND	10			
Ethylbenzene	ND	10			
m,p-Xylene	ND	20			
o-Xylene	ND	20			
Toluene	ND	30			

Qualifiers:

ND - Not Detected at the Reporting Limit  
J - Analyte detected below quantitation limits

S - Spike Recovery outside accepted recovery limits  
R - RPD outside accepted recovery limits

B - Analyte detected in the associated Method Blank

# On Site Technologies, LTD.

Date: 06-Dec-99

CLIENT: Louis Dreyfus Natural Gas  
Work Order: 9911023  
Project: Landfarms

## QC SUMMARY REPORT Sample Matrix Spike

Sample ID: 9911022-01AMS Batch ID: GRO\_S-12/2/ Test Code: SW8015B Units: µg/Kg Analysis Date: 11/16/99 Prep Date:  
Client ID: 9911023 Run ID: GC-1\_991116B SeqNo: 21635

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	Lowlimit	Highlimit	RPD Ref Val	%RPD	RPDLimit	Qual
Benzene	88.77	10	100	0	88.8%	80	120				
Ethylbenzene	93.14	10	100	0	93.1%	80	120				
m,p-Xylene	187.4	20	200	0	93.7%	80	120				
o-Xylene	188.6	20	200	0	94.3%	80	120				
Toluene	276.5	30	300	0	92.2%	80	120				

Sample ID: 9911022-01AMS Batch ID: GRO\_S-12/2/ Test Code: SW8015B Units: µg/Kg Analysis Date: 11/16/99 Prep Date:  
Client ID: 9911023 Run ID: GC-1\_991116B SeqNo: 21636

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	Lowlimit	Highlimit	RPD Ref Val	%RPD	RPDLimit	Qual
Benzene	87.3	10	100	0	87.3%	80	120	88.77	1.7%	20	
Ethylbenzene	91.27	10	100	0	91.3%	80	120	93.14	2.0%	20	
m,p-Xylene	184	20	200	0	92.0%	80	120	187.4	1.9%	20	
o-Xylene	186.3	20	200	0	93.1%	80	120	188.6	1.2%	20	
Toluene	271.7	30	300	0	90.6%	80	120	276.5	1.8%	20	

Qualifiers: ND - Not Detected at the Reporting Limit S - Spike Recovery outside accepted recovery limits B - Analyte detected in the associated Method Blank  
J - Analyte detected below quantitation limits R - RPD outside accepted recovery limits

# On Site Technologies, LTD.

Date: 06-Dec-99

**CLIENT:** Louis Dreyfus Natural Gas  
**Work Order:** 9911023  
**Project:** Landfarms

## QC SUMMARY REPORT

Laboratory Control Spike - generic

Sample ID: LCS Soil	Batch ID: GRO_S-12/2	Test Code: SW8015B	Units: µg/Kg	Analysis Date: 11/16/99	Prep Date:						
Client ID:	9911023	Run ID: GC-1_991116B		SeqNo: 21627							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	Lowlimit	Hightlimit	RPD Ref Val	%RPD	RPDLimit	Qual
Benzene	93.68	10	100	0	93.7%	80	120				
Ethylbenzene	98.82	10	100	0	98.8%	80	120				
m,p-Xylene	201	20	200	0	100.5%	80	120				
o-Xylene	198.6	20	200	0	99.3%	80	120				
Toluene	292.8	30	300	0	97.6%	80	120				

**Qualifiers:** ND - Not Detected at the Reporting Limit  
J - Analyte detected below quantitation limits

S - Spike Recovery outside accepted recovery limits  
R - RPD outside accepted recovery limits

B - Analyte detected in the associated Method Blank

# On Site Technologies, LTD.

Date: 06-Dec-99

**CLIENT:** Louis Dreyfus Natural Gas  
**Work Order:** 9911023  
**Project:** Landfarms

## QC SUMMARY REPORT

Continuing Calibration Verification Standard

Sample ID: CCV1 GRO\_99092 Batch ID: GRO\_S-12/Z/ Test Code: SW8015B Units: µg/Kg Analysis Date 11/16/99 Prep Date:  
 Client ID: 9911023 Run ID: GC-1\_991116B SeqNo: 21626

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Benzene	96.51	10	100	0	96.5%	85	115				
Ethylbenzene	101.4	10	100	0	101.4%	85	115				
m,p-Xylene	203.7	20	200	0	101.9%	85	115				
o-Xylene	204.1	20	200	0	102.1%	85	115				
Toluene	300.5	30	300	0	100.2%	85	115				
Trifluorotoluene	76.95	0	80	0	96.2%	70	130				

Sample ID: CCV2 GRO\_99092 Batch ID: GRO\_S-12/Z/ Test Code: SW8015B Units: µg/Kg Analysis Date 11/16/99 Prep Date:  
 Client ID: 9911023 Run ID: GC-1\_991116B SeqNo: 21637

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Benzene	97.33	10	100	0	97.3%	85	115				
Ethylbenzene	101.5	10	100	0	101.5%	85	115				
m,p-Xylene	203.5	20	200	0	101.8%	85	115				
o-Xylene	205.2	20	200	0	102.6%	85	115				
Toluene	302.8	30	300	0	100.9%	85	115				
Trifluorotoluene	75.61	0	80	0	94.5%	70	130				

**Qualifiers:** ND - Not Detected at the Reporting Limit S - Spike Recovery outside accepted recovery limits B - Analyte detected in the associated Method Blank  
 J - Analyte detected below quantitation limits R - RPD outside accepted recovery limits

**Contract Environmental Services, Inc.**

**Post Office Box 505**

**Kirtland, New Mexico 87417-0505**

**Phone (505) 325-1198**

RECEIVED  
FEB 1 1996  
JAN 21 1996 10 18 52

January 21, 1996

Louis Dreyfus Natural Gas Co.  
Mr. Gene Simer  
Post Office Box 370  
Carlsbad, New Mexico 88221

RE: Federal #6-32 (Sec 06, T26N, R07W) Monitor Well

Dear Mr. Simer,

Contract Environmental Services, Inc. (CES) is pleased to present this letter report on the installation of a monitoring well for the Federal #6-32 well location. This report includes background information, scope of services, field test data, laboratory data, conclusions and recommendations.

**Background Information**

On October 4, 1995 CES began excavating contaminated soil from the separator pit on the above referenced well location. The excavation was recently completed with an approximate 150 cubic yards of contaminated soil removed. The soil removed was evenly distributed on the surface where it could be soil farmed until remediated. On October 19, 1995 CES issued a technical report presenting the findings of this investigation. On December 4, 1995 CES installed one monitor well in the anticipated downgradient direction from the excavation. The following day the monitor well was developed and sampled.

**Scope Of Services**

CES with the help of Phillip Environmental installed the monitor well to a depth of approximately 37 feet. The monitor well is located 8' from the northwest corner of the excavation (Please see attached Figure 1). The bottom 15' of the 4" PVC pipe was slotted (Please see attached Figure 2) and the top 22' was completed with unscreened PVC pipe. The bottom of the monitor well has a 4" screw-on plug that prevents sediments from entering the bottom of the well. All of the joints were composed of screw-together threads. Silica sand was backfilled 2' above the slotted interval. Above the sand a 2' bentonite plug was placed. The remainder of the open hole was grouted to within 2' of groundlevel. From this point to the surface, the PVC pipe was cemented in place. A riser was left on the monitoring well approximately 3' above ground level. T-posts and fluorescent flagging was placed on all sides of the monitor well to protect it before leaving.

The monitor well was developed until the muddy water cleared up prior to sampling. An estimated five volumes of water were removed before collection for laboratory analyses. Water samples were gathered to be analyzed for Benzene, Toluene, Ethylbenzene, Xylenes (BTEX); Metals; Cations / Anions; and Polyaromatic Hydrocarbons (PAH). All water was analyzed using EPA Test Methods.



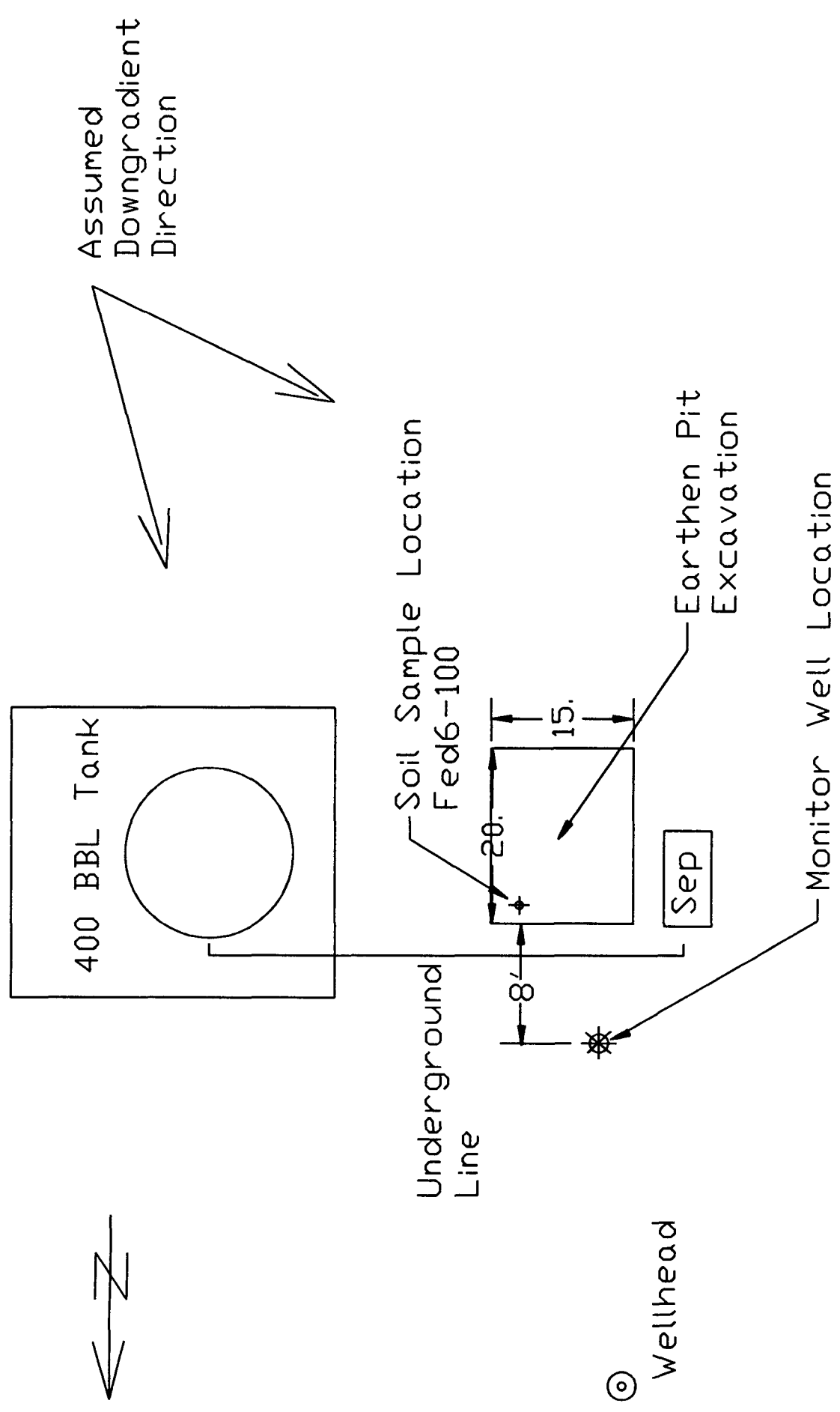
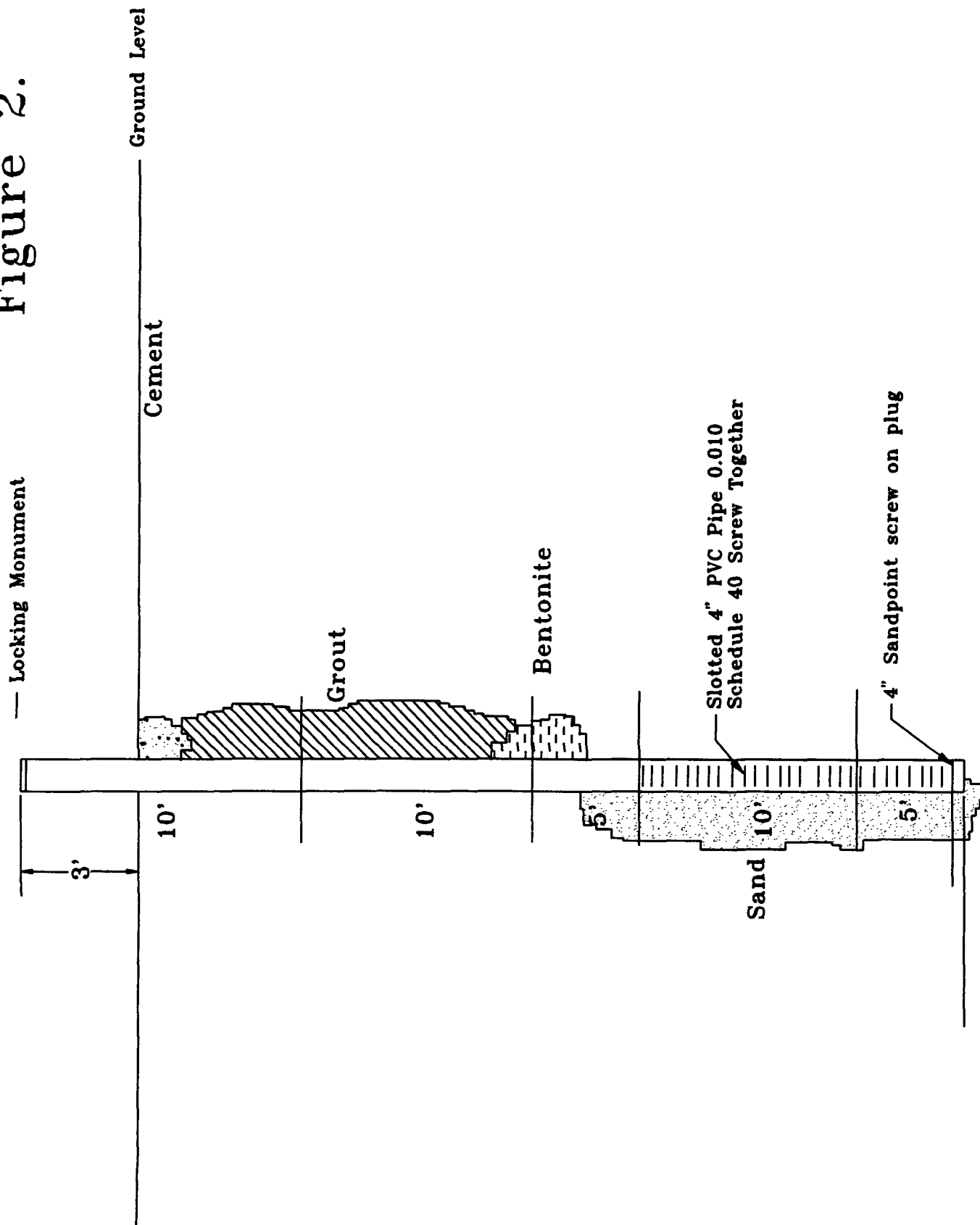


Figure 1.

Figure 2.



During the drilling operations, soil samples were gathered approximately every 5' of depth. Samples were collected from split-spoon samplers driven 24" into the soil. The soil was placed in baggies and tested with the PID Meter for hydrocarbons. The depth to water from the top of the casing riser measured 20'-11 5/8". Considering the height of the riser, that makes the first measured depth to groundwater approximately 18'.

#### Field Test Data

Field data collected during the drilling process included soil samples tested with a Photo-Ionization Detector (PID) Meter. The field data gathered is presented in the following Table.

Table 1-1.

Sample No.	Depth	PID(PPM)
1	3.5-5.5'	7.8
2	8.5-10.5'	1.5
3	13.5-15.5'	8.0
4	18.5-20.5'	7.1

Water encountered next sampling interval

#### Laboratory Data

The laboratory data gathered is summarized in the following Table. Individual laboratory reports are attached for your viewing.

Table 1-2.

Sample No.	Description	(Units)	
Fed6-404	BTEX EPA Method 602.2	B	ND PPB
		T	ND PPB
		E	ND PPB
		X	1.08 PPB
Fed6-405	Metals EPA Method 600/4	Arsenic	<0.005 PPM
		Barium	<0.25 PPM
		Cadmium	<0.002 PPM
		Chromium	<0.02 PPM
		Lead	<0.005 PPM
		Mercury	<0.001 PPM
		Selenium	<0.006 PPM
		Silver	<0.01 PPM
Fed6-406	Cation / Anion EPA Method 8310	Total Hardness	101 PPM
		Calcium	28.3 PPM
		Magnesium	7.36 PPM
		Potassium	<5.0 PPM
		Sodium	780 PPM
		Iron	0.05 PPM
		Total Alkalinity	497 PPM
		Bicarbonate	497 PPM

Cation / Anion Difference = 3.82

Chloride	20.0	PPM
Sulfate	1,360	PPM

Fed6-407	Polynuclear Aromatic Hydrocarbons	Acenaphthene	<2.13	PPB
		Acenaphthylene	<3.74	PPB
		Anthracene	<1.49	PPB
		Benzo(a)anthracene	<0.88	PPB
		Benzo(a)pyrene	<0.39	PPB
		Benzo(b)fluoranthene	<0.19	PPB
		Benzo(k)Fluoranthene	<0.34	PPB
		Benzo(ghi)perylene	<1.23	PPB
		Chrysene	<0.88	PPB
		Dibenzo(a,h)anthracene	<0.72	PPB
		Fluoranthene	<0.15	PPB
		Fluorene	<1.29	PPB
		Indeno(1,2,3-cd)pyrene	<1.05	PPB
		Naphthalene	<5.82	PPB
		Phenanthrene	<1.22	PPB
		Pyrene	<0.13	PPB

### Conclusions

Water data for BTEX was below New Mexico Drinking Water Standards as outlined in NMED Drinking Water Regulations (Title 20, Chapter 7, Part 1). Large numbers were found in the following concentrations, Sodium, Alkalinity, Sulfate. These values are to be considered normal for water found in a wash bottom such as this.

### Recommendations

As confirmed with NMOCD, CES recommends that a second interval of BTEX water analyses should be collected from the monitor well within 60 days. If the BTEX concentration is below groundwater standards as found in this first interval, the monitoring well should be grouted to the surface and abandoned. "No Further Action" would be applied for to NMOCD for groundwater remediation. The contaminated soil in the soil farm should be regularly tilled as the weather warms until it has been reduced to less than 100 PPM from a laboratory TPH analysis. The excavation could then be backfilled and a "Closure Package" prepared for distribution to NMOCD.

Contract Environmental Services, Inc. appreciates this opportunity to present this letter report on the Federal # 6-32 to Louis Dreyfus Natural Gas. If you have questions or require additional information, please don't hesitate to contact our offices at (505) 325-1198 or stop by at 4200 Hawkins Road, Farmington.

Sincerely,



Shawn A. Adams  
Contract Environmental Services, Inc.

**PURGEABLE AROMATICS**

Contract Environmental Services, Inc.

Project ID: Largo Wells  
Sample ID: 404 - 407  
Lab ID: 2066  
Sample Matrix: Water  
Preservative: Cool  
Condition: Intact

Report Date: 12/09/95  
Date Sampled: 12/05/95  
Date Received: 12/05/95  
Date Analyzed: 12/08/95

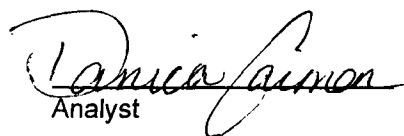
Target Analyte	Concentration (ug/L)	Detection Limit (ug/L)
Benzene	ND	0.50
Toluene	ND	0.50
Ethylbenzene	ND	0.50
m,p-Xylenes	1.08	1.00
o-Xylene	ND	0.50
Total BTEX		1.08

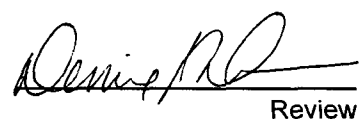
ND - Analyte not detected at the stated detection limit.

<b>Quality Control:</b>	<u>Surrogate</u>	<u>Percent Recovery</u>	<u>Acceptance Limits</u>
	Trifluorotoluene	100	88 - 110%
	Bromofluorobenzene	86	86 - 115%

**Reference:** Method 602.2, Purgeable Aromatics; Federal Register, Vol. 49, No. 209, Oct. 1984.

**Comments:**

  
Analyst

  
Review

**Total Metals Analysis**  
**Contract Environmental Services, Inc.**

Project ID: Largo Wells  
Sample ID: 404 - 407  
Laboratory ID: 2066  
Sample Matrix: Water

Date Reported: 01/09/96  
Date Sampled: 12/05/95  
Time Sampled: NA  
Date Received: 12/05/95

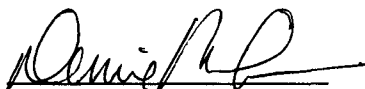
Parameter	Analytical Result (mg/L)	Units
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**Trace Metals**

Arsenic.....	< 0.005	mg/L
Barium.....	< 0.25	mg/L
Cadmium.....	< 0.002	mg/L
Chromium.....	< 0.02	mg/L
Lead.....	< 0.005	mg/L
Mercury.....	< 0.001	mg/L
Selenium.....	0.006	mg/L
Silver.....	< 0.01	mg/L

**Reference:** U.S.E.P.A. 600/4-79-020, Methods for Chemical Analysis of Water and Wastes, 1983.  
Standard Methods For The Examination Of Water And Wastewater, 18th ed., 1992.

**Comments:**

  
Review


## API Suite

### Contract Environmental Services, Inc.

Project ID:	Largo Wells	Date Reported:	01/09/96
Sample ID:	404 - 407	Date Sampled:	12/05/95
Laboratory ID:	2066	Time Sampled:	NA
Sample Matrix:	Water	Date Received:	12/05/95

Parameter	Analytical Result	Units
<b>General</b>		
Lab pH.....	7.8	s.u.
Lab Conductivity @ 25° C.....	3,590	µmhos/cm
Total Dissolved Solids @ 180°C.....	2,530	mg/L
Total Dissolved Solids (Calc).....	2,500	mg/L
Specific Gravity.....	1.005	***
<b>Anions</b>		
Total Alkalinity as CaCO <sub>3</sub> .....	497	mg/L
Bicarbonate Alkalinity as CaCO <sub>3</sub> .....	497	mg/L
Carbonate Alkalinity as CaCO <sub>3</sub> .....	NA	mg/L
Hydroxide Alkalinity as CaCO <sub>3</sub> .....	NA	mg/L
Chloride.....	20.0	mg/L
Sulfate.....	1,360	mg/L
Nitrate + Nitrite - N.....	NA	
Nitrate - N.....	NA	
Nitrite - N.....	NA	
<b>Cations</b>		
Total Hardness as CaCO <sub>3</sub> .....	101	mg/L
Calcium.....	28.3	mg/L
Magnesium.....	7.36	mg/L
Potassium.....	< 5.0	mg/L
Sodium.....	780	mg/L
Iron.....	0.05	mg/L
<b>Data Validation</b>		<u>Acceptance Level</u>
Cation/Anion Difference.....	3.82	+/- 5 %
TDS (180):TDS (calculated).....	1.0	1.0 - 1.2

**Reference** U.S.E.P.A. 600/4-79-020, Methods for Chemical Analysis of Water and Wastes, 1983.  
Standard Methods For The Examination Of Water And Wastewater, 18th ed., 1992.

  
 Review

## Polyaromatic Hydrocarbons EPA Method 8310

### Contract Environmental Services, Inc.

Project ID: Largo Wells  
Sample ID: 404 - 407  
Lab ID: 2066  
Sample Matrix: Water  
Preservative: Cool  
Condition: Intact

Report Date: 01/05/96  
Date Sampled: 12/05/95  
Date Received: 12/05/95  
Date Extracted: 12/11/95  
Date Analyzed: 12/21/95

Target Analyte	Concentration (µg/L)
Acenaphthene	< 2.13
Acenaphthylene	< 3.74
Anthracene	< 1.49
Benzo(a)anthracene	< 0.88
Benzo(a)pyrene	< 0.39
Benzo(b)fluoranthene	< 0.19
Benzo(k)fluoranthene	< 0.34
Benzo(ghi)perylene	< 1.23
Chrysene	< 0.88
Dibenzo(a,h)anthracene	< 0.72
Fluoranthene	< 0.15
Fluorene	< 1.29
Indeno(1,2,3-cd)pyrene	< 1.05
Naphthalene	< 5.82
Phenanthrene	< 1.22
Pyrene	< 0.13

Reference: EPA Method 8310: Polynuclear Aromatic Hydrocarbons .

  
Review



## CHAIN OF CUSTODY

[illegible]

**Contract Environmental Services, Inc.**

**Post Office Box 505**

**Kirtland, New Mexico 87417-0505**

**Phone (505) 325-1198**

**RECEIVED**

**OCT 31 1995**

**Environmental Bureau  
Oil Conservation Division**

October 19, 1995

New Mexico Oil Conservation Division  
Mr. Bill Olson  
2400 Pacheco Street  
Santa Fe, New Mexico 85730

RE: Louis Dreyfus Natural Gas Corporation, Federal #6-32, Sec 6, T26N, R07W SW/NE, Rio  
Arriba County, New Mexico

Dear Mr. Olson,

Contract Environmental Services, Inc. (CES) is pleased to present this "Plan of Action" for the Federal # 6-32 well location on behalf of Louis Dreyfus Natural Gas Corporation (LDNG). This plan contains background information, current site assessment data, a site plan, conclusions and a "Plan of Action".

**Background Information**

On October 4, 1995 CES began excavating the soil immediately below the earthen pit. As soils were removed from the excavation, periodic samples were gathered to be analyzed using a Photo-Ionization Detector (PID) meter. Soils removed were transferred to another portion of the wellpad to establish a soil farm for continued remediation. These soils were spread on the wellpad some 6" to 12" in depth to allow for aeration and the release of volatile aromatic hydrocarbons.

Approximately 70 cubic yards of contaminated soil was removed from the pit area during the excavation process. At a depth of 17' a field PID soil sample indicated that the contaminated soil had not been removed. A confirmation laboratory soil sample was gathered to be processed for Total Petroleum Hydrocarbons (TPH) using EPA Method 418.1. This laboratory soil analysis confirmed that uncontaminated soil had not been reached. The remainder of the pit area was "Cleaned Out" to this same depth. It is anticipated that not all contamination was removed from the walls of the excavation. On the north side of the excavation a subsurface flow line prevents removing all contaminated material. On the east side a berm and fence around storage tanks prevents further excavation in that direction. The separator was located on the west side of the excavation. Underground lines and surface equipment prevented further excavation in at least three of the four directions. Leaving the excavation open for an extended period of time will enable the contaminate wall soil to remediate as well.

The following is field PID data collected during the removal process.

### Center Of Earthen Pit

#### PID Field Data Collected

<u>Depth</u>	<u>Sample No.</u>	<u>PID(PPM)</u>	<u>Location</u>
4'	#1	2000+	Center of Pit
6'	#2	2000+	Center of Pit
10'	#3	2000+	Center of Pit
14'	#4	2000+	Center of Pit
17'	#5	2000+	Center of Pit

#### Laboratory Data Collected

<u>Depth</u>	<u>Sample No.</u>	<u>PID(PPM)</u>	<u>Location</u>
17'	FED6-100	3,050	Northeast Corner

#### Conclusions

Soil contamination continued beyond the digging ability of the equipment used. Remaining wall contamination will remediate while the excavation remains open during the soil farm remediation process. CES believes that LDNG has not removed the majority of the contaminated soil or sufficiently defined the vertical extent. CES ranks this site at 100 PPM cleanup score with a maximum benzene level of 10 PPM. The amount of impact to the groundwater is unknown at this point.

#### Plan of Action

Continue removing the contaminated soils from the excavation, move in a lateral direction testing the excavation walls as the digging proceeds. Remove the contamination in the excavation walls until the PID Meter indicates below 100 PPM. Remediate the soils contained in the soil farm to below 100 PPM laboratory TPH by EPA Method 418.1 or 8015 Modified for gas and diesel. Auger in a monitor well approximately 5' into the groundwater in a downgradient direction from the excavation. A water sample will be collected from this monitor well after the standard 3 volumes of water have been extracted. The water sample will be analyzed for Benzene, Toluene, Ethylbenzene and Xylenes (BTEX) using EPA Method 8020. Return the remediated soils to the pit area as backfill and slightly dome the area to prevent water ponding. In addition, the soils will be checked for contamination approximately every 4' during the drilling process while installing the monitor well. A report on the finding will be presented to NMOCD for their records.

Contract Environmental Services, Inc. appreciates this opportunity to present this "Plan of Action" on behalf of Louis Dreyfus Natural Gas Corporation. If you have questions or require additional information, please don't hesitate to contact our offices at (505) 325-1198 or stop by at 4200 Hawkins Road, Farmington.

Sincerely,

  
Shawn A. Adams

Contract Environmental Services, Inc.

cc: Mr. Denny Foust, NMOCD Farmington  
Mr. Bill Liese, BLM Farmington

