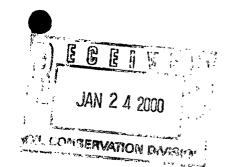
3R - 270

GENERAL CORRESPONDENCE

YEAR(S): 2000-1995



Louis Dreyfus
Natural Gas

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 revegitate 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.

I Hank you

Tommy H. Arnwine

Environmental & Safety Director

cc: Gene Simer

OCD- Aztec-Denny Faust BLM- Farmington- Bill Liese

Form 3160- (June 1990)		TED STATES	FORM APPROVED Budget Bureau No. 1004-0135
(Suite 1770)	DEFARIME	NT OF THE INTERIOR LAND MANAGEMENT	Expires: March 31, 1993
	BUREAU OF	EAND MANAGEMENT	5. Lease Designation and Serial No.
	SUNDRY NOTICES	AND REPORTS ON WELLS	20784 6. If Indian, Allottee or Tribe Name
Do not		rill or to deepen or reentry to a different reservoir. R PERMIT—" for such proposals	o. It halan, Another of The Name
		T IN TRIPLICATE	7. If Unit or CA, Agreement Designation
1. Type of Oil We	l ren Gas ren		8. Well Name and No.
2. Name o			Federal 6-32
	Dreyfus Natural Gas		9. API Well No.
	s and Telephone No. Box 370, Carlsbad, NM 88	221	3003922963 10. Field and Pool, or Exploratory Area
	n of Well (Footage, Sec., T., R., M., or Survey E		GCNM
Soo 6	6, T26N, R07W, SW/NE		11. County or Parish, State
sec. (0, 120N, KO/W, DW/KL		
			Rio Arriba, New Mexico
12.	CHECK APPROPRIATE BOX	s) TO INDICATE NATURE OF NOTICE, REPOR	RT, OR OTHER DATA
	TYPE OF SUBMISSION	TYPE OF ACTION	
	Notice of Intent	Abandonment	Change of Plans
		Recompletion	New Construction
	Subsequent Report	Plugging Back	Non-Routine Fracturing
	Trial About annua Maria	Casing Repair	Water Shut-Off
	Final Abandonment Notice	Altering Casing X Other Final Pit CLosure	Conversion to Injection Dispose Water
			(Note: Report results of multiple completion on Well Completion or Recompletion Report and Log form.)
		I pertinent details, and give pertinent dates, including estimated date of starting	
		cal depths for all markers and zones pertinent to this work.)*	have proven
All La	aboratory analysis for so	il farms and ground water monitor well DNG proposes the following leading to	"final closure"
	n limits of guidelines. E t and monitor well:	DNG bloboses the lollowing leading to	
OI PI	I) Grou	t monitor well to top, cut off and aba	ndon.
		our soil farm to suit location drainag	
	3) Rese	ed to BLM area requirements.	
	. 7		
		•	
14 151	it. So the Commission in true and commission		
	y certify than the foregoing is true and correct	Tide Environmental & Safety Direc	tor _{Para} 1-17-2000
Signed .	pace for Federal or State office use)	1100	Date
•		Tida	Pete
Approve Condition	ed by ons of approval, if any:	Title	Date

GENERAL INSTRUCTIONS

structions 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 the depth to top of any left in the hole; method of closing to pulled 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

ROUTINE USES:

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.

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

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 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	1: 10-4	4-95	Date completed:	12-6-99
Remediation Method:	Excavation	X Appro	ox. cubic yards	388
(Check all appropriate sections)	Landfarmed	X <u>Insitu</u>	Bioremediation	
	Other			
				
Remediation Location: (i.e. landfarmed onsite,	Onsite X	Offsite	· · · · · · · · · · · · · · · · · · ·	
name and location of		***		
offsite facility)				
General Description of R	emedial Action:		···	·
Placed excavated	soil into two	land farm a	reas. Turn soi	1 and fertilize periodically
and sample.				
				
		<u></u>		· · · · · · · · · · · · · · · · · · ·
Ground Water Encounter	ed: No	<u>X</u> Yes	Depth	
Final Pit:	Sample location			
Closure Sampling:	Sample location			
(if multiple samples, attach sample results				
and diagram of sample	Sample depth			
locations and depths)	Sample date		Sample	time
	Sample Results			
	-			
	Benzen	e (ppm)		
	Total B	TEX (ppm)		_
	Field h	eadspace (ppm)		
	ТРН	•		
Garand Water Sample:	Yes X	No	(If yes, attach sai	male seculta)
Ground Water Sample:				
I HEREBY CERTIFY TO OF MY KNOWLEDGE		MATION ABOV	E IS TRUE AND C	OMPLETE TO THE BEST
				
DASSE 1-17-2000	, 1			
DATE 1-17-2000	H.Humi	PRINTED NAI	MB Tommy H. Ar	rnwine & Safety Director

District I P.O. Box 1920, Hobbe, NM State of New Mexico
Energy, Minerals and Natural Resources Department

District II
P.O. Drawer DD,
District III

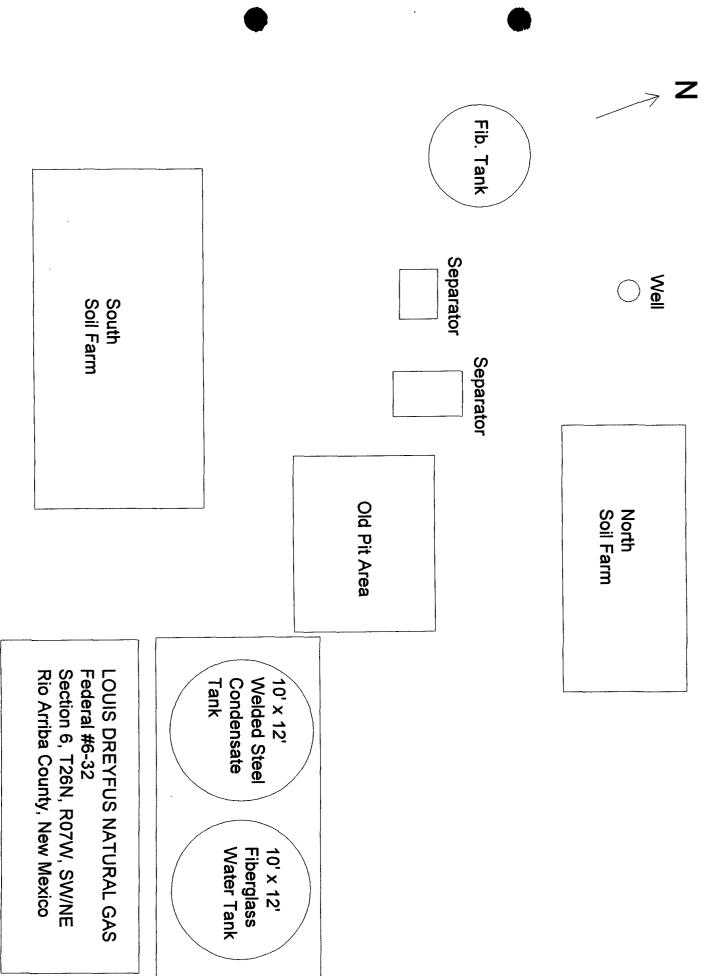
1000 Rio Brazoe Rd., Aztec, NM 87410

OIL CONSERVATION DIVISION
P.O. Box 2088
Sante Fe, New Mexico 87504-2088

SUBMIT 1 COPY TO APPROPRIATE DISTRICT OFFICE AND 1 COPY TO SANTE FE OFFICE

PIT REMEDIATION AND CLOSURE REPORT

Operator:	Luis Dreyfus Natur	al Gas Telephone:	(915)387-5355	_
Address:	P.O. Box 525, Sono	ra, TX 76950		-
Facility Or: Well Name	Fed. 6-32			_
Location Unit or	· Qtr/Qtr Sec SW/SEcc 6	T 26N R07W County	Rio Arriba	
Pit Type:	Separator Dehydra	ator Other		_
Land Type:	BLM ,State	,Fee , Other		
Pit Location:	Pit dimensions: length	35 , width		
(Attach diagram)	Reference: wellhead	i X, Other		ingen a de anie.
	Footage from reference:	100 ft.		
	Direction from reference:	Degrees 150°	-	
			of West South	
Depth To Ground		Less than 50 feet	(20 points)	
(Vertical distance contaminants to so high water elevation ground water)	easonal	50 feet to 99 feet Greater than 100 feet	(10 points) (0 points) <u>20</u>	
		Yes No	(20 points) (0 points) 0	
Distance To Surfa (Horizontal distandal lakes, ponds, river irrigation canals as	ce to perennial rs, streams, creeks,	Less than 200 feet 200 feet to 1000 feet Greater than 1000 feet	(20 points) (10 points) (0 points)	
		RANKING SCORE (TOTA	AL POINTS):	



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.

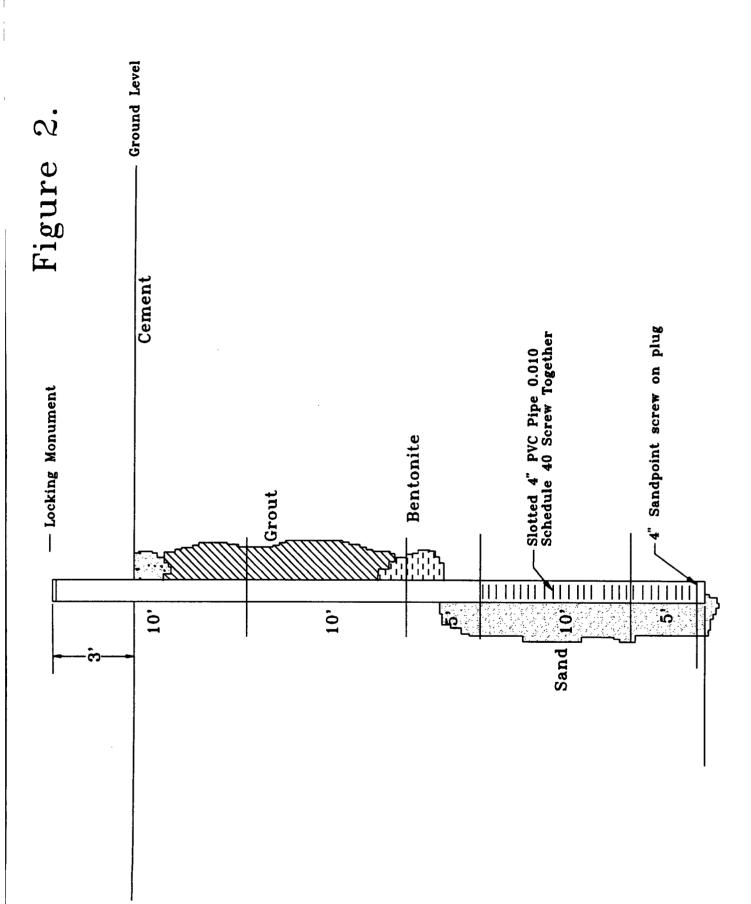
Background Information

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.



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 T E X	ND ND ND 1.08	PPB PPB PPB PPB
Fed6-405	Metals EPA Method 600/4	Arsenic Barium Cadmium Chromium Lead Mercury Selenium Silver	<0.005 <0.25 <0.002 <0.02 <0.005 <0.001 <0.006 <0.01	PPM PPM PPM
Fed6-406	Cation / Anion EPA Method 8310	Total Hardness Calcium Magnesium Potassium Sodium Iron Total Alkalinity Bicarbonate	101 28.3 7.36 <5.0 780 0.05 497 497	PPM PPM PPM PPM PPM PPM PPM

	Cation / Anion Difference = 3.82	Chloride Sulfate	20.0 1,360	PPM 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:

Condition:

Preservative:

Water

Cool Intact Report Date:

12/09/95

Date Sampled: Date Received:

12/05/95 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.

Quality Control:

Surrogate

Percent Recovery

Acceptance Limits

Trifluorotoluene

100

88 - 110%

Bromofluorobenzene

86

86 - 115%

Denie RG

Reference:

Method 602.2, Purgeable Aromatics; Federal Register, Vol. 49, No. 209,

Oct. 1984.

Comments:



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 12/05/95 Sample Matrix: Date Received: Water

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:

Duis Review



API Suite Contract Environmental Services, Inc.

Project ID:

Largo Wells

404 - 407

Date Reported:

01/09/96

Sample ID:

Date Sampled:

12/05/95

Laboratory ID:

2066

Time Sampled:

NA

Sample Matrix:

Water

Date Received:

12/05/95

Parameter		Analytical Result	Units
General	Lab pH	7.8	s.u.
	Lab Conductivity @ 25° C	3,590	μ mhos/cm
	Total Dissolved Solids @ 180°C	2,530	mg/L
	Total Dissolved Solids (Calc)	2,500	mg/L
	Specific Gravity	1.005	***
Anions	Total Alkalinity as CaCO₃	497	mg/L
	Bicarbonate Alkalinity as CaCO ₃	497	mg/L
	Carbonate Alkalinity as CaCO ₃	NA	mg/L
	Hydroxide Alkalinity as CaCO ₃	NA	mg/L
	Chloride	20.0	mg/L
	Sulfate	1,360	mg/L
	Nitrate + Nitrite - N	NA	
	Nitrate - N	NA	
	Nitrite - N	NA	
Cations	Total Hardness as CaCO ₃	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
Data Validation			Acceptance Leve
	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: Sample ID: Largo Wells 404 - 407 Report Date: Date Sampled:

01/05/96 12/05/95

Lab ID: Sample Matrix: 2066 Water Date Received:
Date Extracted:

Date Analyzed:

12/05/95 12/11/95

12/21/95

Preservative: Condition:

Cool Intact

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

Denie M

Please Fill Out Thoroughly. White/Yellow: Analytica Pink: Client Page of COMMENTS Shaded areas for lab use only. Other (specify): METALS RCRA Metals TCLP (1311) HCRA Metals (Total) Descrived Priority Pollutants Relinquished By: Received By: Other (specify): WATER ANALYSES Oil and Grease Nutrients: NH4+ / NO2- / NO3- / TKN Solids: TDS / TSS / SS **CHAIN OF CUSTODY** BOD / Fecal / Total Coliform Specific Anions (specify): Specific Cations (specify): × Cation / Anion × × Relinquished By: Other (specify): Received By: TCLP Extraction Signature Company Polynuclear Aromatic Hydrocarbons (8100) × ORGANIC ANALYSES Base / Neutral / Acid GC/MS (625 / 8270) 125k Volatiles GC/MS (624 / 8240 / 8260) Contine, ENV. Selv. Date: Time: Herbicides (615 / 8150) Chlorinated Pesticides / PCBs (608 / 8080) (f.£03 \ f.S03) selitslov AWQS Chlorinated Hydrocarbons (8010) × Aromatic HCs BTEX/MTBE (602 / 8020) \succ Sampled By: Required Turnaround Time (Prior Authorization Required for Rush) Received By: Gasoline (GRO) Company: Gasoline / Diesel (mod. 8015) Company: Petroleum Hydrocarbons (418.1) (2. X2) CapiD をしていますってものか Custody Seals: Y / N / NA Sample Receipt ENVIRONMENTAL LABORATORY 807 S. CARLTON • FARMINGTON, NM 87401 • (505) 326-2395 35-11-52 Matrix Lair Dryfu. EN -Received Intact: ___ No. Containers: Received Cold: intlant Time 4N ALYTICA 100-4003 12-59 Date PROJECT MANAGER: 1 150 (2.1) Project Information Analytica Lab I.D.: 404 -40H Sample ID 1/08-41 Company: Company: Proj. Name: Shipped Via: Address: Address: Phone: Bill To: P. O. No: Proj.#: Fax:

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>	Sample No.	PID(PPM)	<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>	Sample No.	PID(PPM)	Location
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

CHAIN OF CUSTODY RECORD

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

ON SITE

TECHNOLOGIES, LTD.

LABID Special Instructions: Date/Time:/ Date/Time Date/Time Telefax No. ANALYSIS REQUESTED Title 10 Working Days ¥ 24-48 Hours Goldenrod - Client Mailing Address City, State, Zip Telephone No. Company Received by: Name Received by: Received by: Pink - Sampler RESULTS TO Number of Containers Yellow - LAB MATRIX PRES. 40 کم 子のあったとろ Date/Time 9/17/66 Se, L r K Inite - On Site Ficks 200 TIME Date/Time Date/Time 41003 DATE ソーンよろ Company Contract Free Muller street (Client Signature Must Accompany Request Job No. 65-7 City, State, Zip Kill now 10 By 505 してスサバ F. Lens 6-32 SAMPLE IDENTIFICATION Name Thank ATMY へん)かい - Jac 500 Method of Shipment: Purchase Order No.: Address Sampling Location: Relinquished by: Relinquished by: Relinquished by: Authorized by: _ 71m Sampler: TO



LAB: (505) 325-1556

TOTAL PETROLEUM HYDROCARBONS

Attn:

Shawn Adams

Date:

27-Sep-96

Company: Contract Environmental Services, Inc.

COC No.:

4307

Address:

P.O. Box 505

Sample No.

12358

City, State: Kirtland, NM 87417

Job No.

2-1000

Project Name:

Federal #6-32

Project Location:

FED-600

SA

Date:

26-Sep-96 Time:

Sampled by: Analyzed by:

HR

Date:

27-Sep-96

15:30

Sample Matrix:

Soil

Laboratory Analysis

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

Quality Assurance Report

Laboratory Fortified Blank/Spike Soil

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

Duplication

Laboratory Identification	(% RSD)	Limit (% RSD)
12357-4307	1.7	15.0

Approved by: (Date:



LAB: (505) 325-1556

AROMATIC VOLATILE ORGANICS

Attn:

Shawn Adams

Date:

1-Oct-96

Company: Contract Environmental Services, Inc.

COC No.:

4307

Address: P.O. Box 505

Sample No.

12358

City, State: Kirtland, NM 87417

Job No.

2-1000

Project Name:

Federal #6-32

Project Location:

FED-600

Date: Date: 26-Sep-96 Time:

15:30

Sampled by: Analyzed by:

Sample Matrix:

SA DC Soil

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:

P.O. BOX 2606 • FARMINGTON, NM 87499

- TECHNOLOGY BLENDING INDUSTRY WITH THE ENVIRONMENT -



LAB: (505) 325-1556

AROMATIC VOLATILE ORGANICS

Attn:

Shawn Adams

Date:

1-Oct-96

Company: Contract Environmental Services, Inc.

COC No.:

4307

Address:

P.O. Box 505

Sample No.

12358

City, State: Kirtland, NM 87417

Job No.

2-1000

Project Name:

Federal #6-32

Project Location:

FED-600

Date:

26-Sep-96 Time:

Sampled by: Analyzed by: SA DC

Date:

30-Sep-96

15:30

Sample Matrix:

Soil

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:



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

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

Calibration Check

	Units of	True	Analyzed		
Analyte	Measure	Value	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	ррь	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

	<i>S1</i>	S2		S1	S2
	Percent	Percent		Percent	Percent
Laboratory Identification	Recovered	Recovered	Laboratory Identification	Recovered	Recovered
Limit Percent Recovery	(70-130)		Limit Percent Recovery	(70-130)	
S1: Flourobenzene			\$1: Flourobenzene		
12357-4307	93				
12358-4307	93				

ENCLOSURE #3 SOIL FARM DATA FEDERAL 6-32

55
5

CHAIN OF CUSTODY, RECORD

Date: 6/19/98

Page _____of

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

ON SITE

TECHNOLOGIES, LTD.

3 10 5 400 ATN TO SA 03A PKDELOSI -OIA LABID Date/Time 6/19/98 Special Instructions: Date/Time Date/Time (port) Telefax No. ANALYSIS REQUESTED <u>o</u> Title 2,0 0.0 2.0 7.0 10 Working Days BOIS 929 X X 又 X X 24-48 Hours floss/ Goldenrod - Client Received by: Head Mailing Address City, State, Zip Telephone No. 乂 义 X X Company Name Received by: Received by: Pink - Sampler RESULTS TO Containers ТЯОЧЭЯ Number of 1,00 MATRIX PRES. 1 > > Distribution: White - On Site Yellow - LAB Date/Time **6/19/9**8 .બુ 2 ~ = = Date 6/19 1:2 6/18P8 10:30 10,35 1.05 00:11 Date/Time H H 66468 TX , Dept. SAMPLE DATE = = Client Signature Must Accompany Request) 2 Z Rovices Si for sort Lart Derty Job No. なれ Sic Form Comp. City, State, Zip Farming Tan Sirkan ton soir tonn Company Contract Env. TAKL-SA SAMPLE IDENTIFICATION ADAM rependi 2-12-6 S. PO BUX Name Char SABARS アメンター 309 MK15-303 302 8 30/ Purchase Order No.: Address Method of Shipment: Sampling Location: Relinquished by: Relinquished by: -289-しとないろ Relinquished by Authorized by: 7637 INVOICE TO Sampler SEND

TECHNOLOGIES, LTD.

OFF: (505) 325-5667

LAB: (505) 325-1556

Date: 30-Jun-98

ANALYTICAL REPORT

Client:

Contract Environmental Services, Inc.

Work Order:

9806081

Lab ID: Project: 9806081-02A

Soil Farms

Matrix: SOIL

Collection Date: 6/18/98 10:35:00 AM

COC Record: 5155

Client Sample ID: F632-301 Soil Farm North

Client Sample Info: Federal 6-32

Parameter	Result	PQL	Qual Units	DF	Date Analyzed
DIESEL RANGE ORGANICS	SI	N8015			Analyst: HR
T/R Hydrocarbons: C10-C28	140	25	mg/Kg	1	6/29/98
GASOLINE RANGE ORGANICS	SI	N8015			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



LAB: (505) 325-1556

ANALYTICAL REPORT

Date: 30-Jun-98

Client:

Contract Environmental Services, Inc.

Work Order:

9806081

Lab ID: Project: 9806081-01A Soil Farms

Matrix: SOIL

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
DIESEL RANGE ORGANICS	sv	/8015			Analyst: HR
T/R Hydrocarbons: C10-C28	50	25	mg/Kg	1	6/27/98
GASOLINE RANGE ORGANICS	sv	V 8015			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

Project: Work Order: 9806081

Soil Farms

Contract Environmental Services, Inc.

Batch ID: GC-2_980626 Test Code: SW8015B Run ID:

9806081

Result

PQL

GC-2_980626B Units: mg/Kg

%REC LowLimit HighLimit RPD Ref Val

SeqNo:

3630

Analysis Date: 6/26/98

Prep Date: 6/26/98

QC SUMMARY REPORT

Method Blank

Date: 24-Sep-99

%RPD RPDLimit Qual

Analyte Client ID:

Sample ID: MB1

T/R Hydrocarbons: C10-C28

SPK value SPK Ref Val

25

8

QC SUMMARY REPORT

Date: 24-Sep-99

Sample Duplicate

CLIENT: Contract Environmental Services, Inc.

Project: Work Order: 9806081

Soil Farms

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

CLIENT: Contract Environmental Services, Inc.

QC SUMMARY REPORT

Date: 24-Sep-99

Sample Matrix Spike

Work Order: 9806081

Project: Soil Farms

226B %REC LC	
126B	Analyte Result
	Client ID: 9806081
Batch ID: GC-2 980626 Test Code: SW8015B Units: mg/Kg Analysis Date: 6/29/98	Sample ID: 9806074-06AMS Batch ID: GC-2_980

CLIENT: Contract Environmental Services, Inc.

Work Order:

Soil Farms

Project: 9806081

QC SUMMARY REPORT

Date: 24-Sep-99

Laboratory Control Spike - generic

Sample ID: LCS	Batch ID: GC-2_980626 Test Code: SW8015B	Test Code:	SW8015B	Units: mg/Kg		Analysis	Analysis Date: 6/27/98	86	Prep Da	Prep Date: 6/26/98	
Client ID:	9806081	Run ID:	Run ID: GC-2_980626B	Ø		SeqNo:	3632				
Analyte	Result	PQL	SPK value	SPK value SPK Ref Val	%REC	LowLimit	HighLimit	LowLimit HighLimit RPD Ref Val	%RPD	%RPD RPDLimit	Qual
T/R Hydrocarbons: C10-C28	529.9	25	502	0	105.6%	70	130				

CLIENT: Contract Environmental Services, Inc.

Project: Work Order: 9806081

Soil Farms

QC SUMMARY REPORT

Date: 24-Sep-99

Continuing Calibration Verification Standard

Sample ID: CCV1 QC0602	Batch ID: GC-2_980626	Test Code: SW8015B	SW8015B	Units: mg/Kg		Analysis	Analysis Date: 6/26/98	æ	Prep Date:	e:	
Client ID:	9806081	Run ID:	GC-2_980626B	₩		SeqNo:	3631				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	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	SW8015B	Units: mg/Kg		Analysis	Analysis Date: 6/27/98	8	Prep Date:	e.	
Client ID:	9806081	Run ID:	GC-2_980626B	₩		SeqNo:	3655				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	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	Analysis Date: 6/27/98	8	Prep Date:	e.	
Client ID:	9806081	Run ID:	GC-2_980626B	00		SeqNo:	3656				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	LowLimit HighLimit RPD Ref Val	%RPD	%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	SW8015B	Units: mg/Kg		Analysis	Analysis Date: 6/29/98)8	Prep Date:	e:	
Client ID:	9806081	Run ID:	GC-2_980626B	00		SeqNo:	3657				
Analyte	Result	P	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	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	SW8015B	Units: mg/Kg		Analysis	Analysis Date: 6/29/98)8	Prep Date:	e:	
Client ID:	9806081	Run ID:	GC-2_980626B	88		SeqNo:	3658				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	LowLimit HighLimit RPD Ref Val	%RPD	RPDLimit	Qual
T/R Hydrocarbons: C10-C28	520.2	25	502	0	103.6%	85	115				

J - Analyte detected below quantitation limits

CLIENT:

Project: Work Order: 9806081

Soil Farms

Batch ID: GC-1_980623 Test Code: SW8015B

9806081

Run ID:

Result

၉

.026

0.18

Analyte Client ID: Sample ID: MB1

T/R Hydrocarbons: C6-C10

Contract Environmental Services, Inc.

Units: mg/Kg Analysis Date: 6/23/98

QC SUMMARY REPORT

Method Blank

Date: 24-Sep-99

Prep Date:

GC-1_980623A SPK value SPK Ref Val %REC LowLimit HighLimit RPD Ref Val SeqNo: 3474 %RPD RPDLimit Qual

CLIENT:

Work Order: 9806081

Contract Environmental Services, Inc.

Project: Soil Farms

QC SUMMARY REPORT

Date: 24-Sep-99

Sample Matrix Spike

Sample ID: 9806087-02AMS	Batch ID: GC-1_980623 Test Code: SW8015B	Test Code:	SW8015B	Units: mg/Kg		Analysis	Analysis Date: 6/23/98	98	Prep Date:	le:	
Client ID:	9806081	Run ID:	GC-1_980623A	>		SeqNo:	3498				
Analyte	Result	PQL	SPK value	SPK value SPK Ref Val	%REC Lov	LowLimit	HighLimit	wLimit HighLimit RPD Ref Val	%RPD	%RPD RPDLimit Qual	Qua
T/R Hydrocarbons: C6-C10	1.496	0.18	1.801	0	83.1%	52	123				
Sample ID: 9806087-02AMSD	Batch ID: GC-1_980623 Test Code: SW8015B	Test Code:	SW8015B	Units: mg/Kg		Analysis	Analysis Date: 6/23/98	8	Prep Date:	le:	
Client ID:	9806081	Run ID:	Run ID: GC-1_980623A	>		SeqNo:	3499				
Analyte	Result	PQL	SPK value	SPK value SPK Ref Val	%REC	LowLimit	HighLimit	LowLimit HighLimit RPD Ref Val	%RPD	%RPD RPDLimit Qual	Qua
T/R Hydrocarbons: C6-C10	1.395	0.18	1.801	0	77.5%	52	123	1.496	7.0%	14	

CLIENT: Contract Environmental Services, Inc.

Project: Work Order: 9806081

Soil Farms

QC SUMMARY REPORT

Date: 24-Sep-99

Laboratory Control Spike - generic

				123	52	101.1%	0.03	1.801	0.18	1.851	T/R Hydrocarbons: C6-C10
Qual	%RPD RPDLimit	%RPD	LowLimit HighLimit RPD Ref Val	HighLimit	LowLimit	%REC	SPK value SPK Ref Val	SPK value	PQL	Result	Analyte
				3476	SeqNo:		Ä	Run ID: GC-1_980623A	Run ID:	9806081	Client ID:
	ite:	Prep Date:	86	Analysis Date: 6/23/98	Analysi		Units: mg/Kg	: SW8015B	Test Code	Batch ID: GC-1_980623 Test Code: SW8015B	Sample ID: LCS

CLIENT: Contract Environmental Services, Inc.

Project: Work Order: 9806081

Soil Farms

QC SUMMARY REPORT

Date: 24-Sep-99

Continuing Calibration Verification Standard

			115 130	85 70	100.3% 94.5%	0 0	1.80 1 0.08	0.18	1.806 .0756	T/R Hydrocarbons: C6-C10 Trifluorotoluene
	Qual	%RPD RPDLimit	LowLimit HighLimit RPD Ref Val	LowLimit	%REC	SPK Ref Val	SPK value	PQL	Result	Analyte
如果		Prep Date:	Analysis Date: 6/23/98 SeqNo: 3500	Analysis SeqNo:		Units: mg/Kg A	Test Code: SW8015B Run ID: GC-1_980623A	Test Code: Run ID:	Batch ID: GC-1_980623 9806081	Sample ID: CCV4 QC0593 Client ID:
a) cert	6		115 130	85 70	84.7% 94.2%	00	1.801 0.08	0.18	1.525 .0754	T/R Hydrocarbons: C6-C10 Triftuorotoluene
	Qual	%RPD RPDLimit	LowLimit HighLimit RPD Ref Val	LowLimit	%REC	SPK Ref Val	SPK value	PQL	Result	Analyte
			3497	SeqNo:		>	GC-1_980623A	Run ID:	9806081	Client ID:
		Prep Date:	alysis Date: 6/23/98	Analysis		Units: mg/Kg	Test Code: SW8015B	Test Code:	Batch ID: GC-1_980623	Sample ID: CCV3 QC0593
			115 130	85 70	93.6% 97.1%	0 0	1.801 0.08	0.18 0	1.686 .0777	T/R Hydrocarbons: C6-C10 Trifluorotoluene
	Qual	%RPD RPDLimit	LowLimit HighLimit RPD Ref Val	LowLimit	%REC	SPK Ref Val	SPK value	PQL	Result	Analyte
			3489	SeqNo:		>	GC-1_980623A	Run ID:	9806081	Client ID:
		Prep Date:	Analysis Date: 6/23/98	Analysis		Units: mg/Kg	SW8015B	Test Code: SW8015B	Batch ID: GC-1_980623	Sample ID: CCV2 QC0593
			115 130	85 70	101.9% 96.1%	0 0	1.801 0.08	0.18 0	1.835 .0769	T/R Hydrocarbons: C6-C10 Trifluorotoluene
	Qual	%RPD RPDLimit	LowLimit HighLimit RPD Ref Val	LowLimit	%REC	SPK Ref Val	SPK value	PQL	Result	Analyte
			3475	SeqNo:		>	GC-1_980623A	Run iD:	9806081	Client ID:
-		Prep Date:	Analysis Date: 6/23/98	Analysis		Units: mg/Kg	SW8015B	Test Code: SW8015B	Batch ID: GC-1_980623	Sample ID: CCV1 QC0593

10421 CHAIN OF CUSTODY RECORD

NM 87499	G
nington, NI	5) 327-1496
x 2606 • Fari	 FAX: (505)
/ Dr. • P.O. Box ;	325-5667
Murray Dr.	LAB: (505)

ON SITE TECHNOLOGIES, LTD.

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Date:

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Authorized by.	(Client Signature Must Accompany Request)	1 -	- 3	1 1 1		7	11/12/95	(

To Re-order Call 325-9600 or Fax 325-9764 alphaghraphas FORM # 01

TECHNOLOGIES, LTD.

OFF: (505) 325-5667

LAB: (505) 325-1556

Date: 06-Dec-99

ANALYTICAL REPORT

Client:

Louis Dreyfus Natural Gas

Work Order:

9911023

Lab ID:

9911023-02A

Matrix: SOIL

Project:

Landfarms

Client Sample Info: Landfarm

Client Sample ID: Fed 6-32 Composite (#1/#2/#3)

Collection Date: 11/12/99

COC Record: 10421-10422

Parameter	Result	PQL	Qual Units	DF	Date Analyzed
DIESEL RANGE ORGANICS	SV	V8015B			Analyst: DM
T/R Hydrocarbons: C10-C28	ND	25	mg/Kg	1	11/24/99
GASOLINE RANGE ORGANICS	sv	V8015B			Analyst: DC
T/R Hydrocarbons: C6-C10	ND	0.18	mg/Kg	1	11/16/99
GASOLINE RANGE ORGANICS	sv	V8015B			Analyst: DM
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

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

E - Value above quantitation range

B - Analyte detected in the associated Method Blank

Surr: - Surrogate

1 of 1

Project: Work Order: 9911023

Louis Dreyfus Natural Gas

CLIENT:

Landfarms

Analyte

Result

PQL

10.53

25

T/R Hydrocarbons: C10-C28

Client ID: Sample ID: MB1 Batch ID: GC-2_991123 Test Code: SW8015B 9911023 Run ID: Units: mg/Kg Analysis Date 11/23/99

GC-2_991123A SPK value SPK Ref Val

> SeqNo: 21551

%REC LowLimit HighLimit RPD Ref Val

%RPD RPDLimit Qual

Prep Date: 11/16/99

QC SUMMARY REPORT

Method Blank

Date: 06-Dec-99

Work Order: CLIENT: Louis Dreyfus Natural Gas 9911023

Landfarms

T/R Hydrocarbons: C10-C28

1121

25

0

0

0

0

970.7

14.4%

24

San Project: Sample Duplicate

QC SUMMARY REPORT

Date: 06-Dec-99

àample ID: 9911023-01AD	Batch ID: GC-2_991123 Test Code: SW8015B Units: mg/Kg	Test Code:	SW8015B	Units: mg/Kg		Analysis	Analysis Date 11/30/99)/99	Prep Da	Prep Date: 11/30/99	
Nient ID: MKL 5-A Composi	9911023	Run ID:	Run ID: GC-2_991123A	>		SeqNo:	21573	•			
vnalyte	Result	P ည	SPK value	PQL SPK value SPK Ref Val	%REC	%REC LowLimit	HighLimit	HighLimit RPD Ref Val	%RPD	%RPD RPDLimit	Qual

CLIENT: Louis Dreyfus Natural Gas 9911023

Project: Work Order:

QC SUMMARY REPORT

Date: 06-Dec-99

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

CLIENT: Louis Dreyfus Natural Gas

Work Order: 9911023

Analyte Client ID:

Result

PQL

SPK value SPK Ref Val

%REC

LowLimit HighLimit RPD Ref Val

%RPD RPDLimit Qual

529.3

25

501.9

10.53

103.4%

59

126

T/R Hydrocarbons: C10-C28

Project: Landfarms

QC SUMMARY REPORT

Date: 06-Dec-99

Laboratory Control Spike - generic

Sample ID: LCS Soil Batch ID: GC-2_991123 Test Code: SW8015B 9911023 Run ID: GC-2_991123A Units: mg/Kg Analysis Date 11/23/99 SeqNo: 21553 Prep Date: 11/16/99

Project: Work Order: 9911023

Landfarms

Louis Dreyfus Natural Gas

CLIENT:

QC SUMMARY REPORT

Date: 06-Dec-99

Continuing Calibration Verification Standard

				115	85	98.1%	0	501.9	25	492.2	T/R Hydrocarbons: C10-C28
Qual	RPDLimit	%RPD	HighLimit RPD Ref Val	HighLimit	LowLimit	%REC	SPK Ref Val	SPK value	PQL	Result	Analyte
				21577	SeqNo:		>	GC-2_991123A	Run ID:	9911023	Client ID:
	te:	Prep Date:	99	Analysis Date 11/29/99	Analysis		Units: mg/Kg	Test Code: SW8015B	Test Code:	Batch ID: GC-2_991123	Sample ID: CCV5 DRO_99100
				115	85	87.4%	0	501.9	25	438.5	T/R Hydrocarbons: C10-C28
Qual	%RPD RPDLimit	%RPD	RPD Ref Val	Limit HighLimit RPD Ref Val	LowLimit	%REC	SPK Ref Val	SPK value	PQL	Result	Analyte
				21576	SeqNo:		A	GC-2_991123A	Run ID:	9911023	Client ID:
	ıte:	Prep Date:	99	Analysis Date 11/24/99	Analysis		Units: mg/Kg	Test Code: SW8015B	Test Code:	Batch ID: GC-2_991123	Sample ID: CCV4 DRO_99100
				115	85	90.7%	0	501.9	25	455.3	T/R Hydrocarbons: C10-C28
Qual	%RPD RPDLimit	%RPD	LowLimit HighLimit RPD Ref Val	HighLimit	LowLimit	%REC	SPK Ref Val	SPK value	PQL	Result	Analyte
				21575	SeqNo:		A	GC-2_991123A	Run ID:	9911023	Client ID:
	ıte:	Prep Date:	99	Analysis Date 11/24/99	Analysis		Units: mg/Kg	Test Code: SW8015B	Test Code:	Batch ID: GC-2_991123	Sample ID: CCV3 DRO_99100
				115	85	92.5%	0	501.9	25	464.4	T/R Hydrocarbons: C10-C28
Qual	RPDLimit	%RPD	RPD Ref Val	Limit HighLimit RPD Ref Val	LowLimit	%REC	SPK Ref Val	SPK value	PQL	Result	Analyte
				21574	SeqNo:		>	GC-2_991123A	Run ID:	9911023	Client ID:
	ıte:	Prep Date:	99	Analysis Date 11/23/99	Analysis		Units: mg/Kg	Test Code: SW8015B	Test Code:	Batch ID: GC-2_991123	Sample ID: CCV2 DRO_99100
				115	85	86.8%	0	501.9	25	435.6	T/R Hydrocarbons: C10-C28
Qual	%RPD RPDLimit	%RPD	LowLimit HighLimit RPD Ref Val	HighLimit	LowLimit	%REC	SPK Ref Val	SPK value	PQL	Result	Analyte
	ite:	Prep Date:	99	Analysis Date 11/23/99 SeqNo: 21552	Analysis SeqNo:		Units: mg/Kg A	SW8015B GC-2_991123A	Test Code: SW8015B Run ID: GC-2_991	Batch ID: GC-2_991123 9911023	Sample ID: CCV1 DRO_99100 Client ID:
		,		-							

J - Analyte detected below quantitation limits

CLIENT: Louis Dreyfus Natural Gas Work Order: 9911023

Project: Landfi

Landfarms

QC SUMMARY REPORT

Continuing Calibration Verification Standard

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

CLIENT: Louis Dreyfus Natural Gas

Project: Work Order: 9911023

Landfarms

QC SUMMARY REPORT

Date: 06-Dec-99

Method Blank

Analyte Client ID: Sample ID: MBlank T/R Hydrocarbons: C6-C10 Batch ID: 8015GRO_S-9911023 Result 8 Test Code: SW8015B Run ID: ည 0.18 GC-1_991116A SPK value SPK Ref Val Units: mg/Kg %REC LowLimit HighLimit RPD Ref Val SeqNo: Analysis Date 11/16/99 21331 %RPD RPDLimit Prep Date:

Qual

CLIENT: Louis Dreyfus Natural Gas Work Order: 9911023

Project: Landfarms

QC SUMMARY REPORT

Date: 06-Dec-99

Sample Matrix Spike

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

J - Analyte detected below quantitation limits

CLIENT: Louis Dreyfus Natural Gas

Work Order: 9911023

Project: Landfarms

Sample ID: LCS Soil

Analyte Client ID:

T/R Hydrocarbons: C6-C10

1.647

0.18

1.802

0

91.4%

65.9

118

Qual

QC SUMMARY REPORT

Date: 06-Dec-99

Laboratory Control Spike - generic

Batch ID: 8015GRO_S-9911023 Result Test Code: SW8015B Run ID: ၉၀ GC-1_991116A SPK value SPK Ref Val Units: mg/Kg %REC LowLimit HighLimit RPD Ref Val SeqNo: Analysis Date 11/16/99 21333 %RPD RPDLimit Prep Date:

Qualifiers:

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

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

B - Analyte detected in the associated Method Blank

CLIENT: Louis Dreyfus Natural Gas 9911023

Project: Work Order:

Landfarms

QC SUMMARY REPORT

Date: 06-Dec-99

Continuing Calibration Verification Standard ļ

Sample ID: CCV1 GRO_99092	Batch ID: 8015GRO_S- Test Code: SW8015B	Test Code:	SW8015B	∪nits: mg/Kg		Analysis	Analysis Date 11/16/99	Prep Date:
Client ID:	9911023	Run ID:	GC-1_991116A	Ä		SeqNo:	21332	
Analyte	Result	PQL	SPK value	SPK value SPK Ref Val	%REC	LowLimit	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	Test Code:	SW8015B	Units: mg/Kg		Analysis	Analysis Date 11/16/99	Prep Date:
Client ID:	9911023	Run ID:	GC-1_991116A	Ď		SeqNo:	21345	
Analyte	Result	PQL	SPK value	SPK value SPK Ref Val	%REC	LowLimit	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	

CLIENT:

Landfarms

Project:

Work Order: Louis Dreyfus Natural Gas 9911023

QC SUMMARY REPORT

Date: 06-Dec-99

Method Blank

Toluene	o-Xylene	m,p-Xylene	Ethylbenzene	Benzene	Analyte	Client ID:	Sample iD: MBlank
N	ND	ND	ND	ND	Result	9911023	Batch ID: GRO_S-12/2/ Test Code: SW8015B
30	20	20	10	10	PQL	Run ID:	Test Code
					SPK value	Run ID: GC-1_991116B	
					SPK value SPK Ref Val	6B	Units: µg/Kg
					%REC		
						SeqNo:	Analysi
					LowLimit HighLimit	: 21625	Analysis Date 11/16/99
					LowLimit HighLimit RPD Ref Val	25	16/99
					%RPD		Prep Date:
					%RPD RPDLimit Qual)ate:
					Qual		

J - Analyte detected below quantitation limits

CLIENT: Louis Dreyfus Natural Gas

Work Order: 9911023
Project: Landfarm

Project: Landfarms

QC SUMMARY REPORT

Date: 06-Dec-99

Sample Matrix Spike

Sample ID: 9911022-01AMS	Batch ID: GRO_S-12/2/ Test Code: SW8015B	Test Code:	SW8015B	Units: µg/Kg		Analysis	Analysis Date 11/16/99	Ö	Prep Date:	ē:	
Client ID:	9911023	Run ID:	GC-1_991116B	B		SeqNo:	21635				
Analyte	Result	PQL	SPK value	SPK value SPK Ref Val	%REC	LowLimit	LowLimit HighLimit RPD Ref Val	RPD Ref Val	%RPD	%RPD RPDLimit Qual	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: 9911022-01AMSD	Batch ID: GRO_S-12/2/ Test Code: SW8015B	Test Code:	SW8015B	Units: µg/Kg		Analysis	Analysis Date 11/16/99	9	Prep Date:	te:	
Client ID:	9911023	Run 1D:	GC-1_991116B	80		SeqNo:	21636				
Analyte	Result	PQL	SPK value	SPK value SPK Ref Val	%REC	LowLimit	LowLimit HighLimit RPD Ref Val	₹PD Ref Val	%RPD	%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	

CLIENT: Louis Dreyfus Natural Gas 9911023

Project: Work Order:

Landfarms

QC SUMMARY REPORT

Date: 06-Dec-99

Laboratory Control Spike - generic

Qual

Sample ID: LCS Soil	Batch ID: GRO_S-12/2/ Test Code: SW8015B	Test Code:		Units: µg/Kg		Analysis	Analysis Date 11/16/99	/99	Prep Date:	ate:
Client ID:	9911023	Run ID:	Run ID: GC-1_991116B	Ø		SeqNo:	21627			
Analyte	Result	PQL	SPK value	SPK value SPK Ref Val	%REC	LowLimit	HighLimit	LowLimit HighLimit RPD Ref Val	%RPD	%RPD RPDLimit
Benzene	93.68	10	100	0	93.7%	80	120			
Ethylbenzene	98.82	10	100	0	98.8%	88	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			

CLIENT: Louis Dreyfus Natural Gas

Work Order: 9911023

Project: Landfarms

QC SUMMARY REPORT

Date: 06-Dec-99

Continuing Calibration Verification Standard

Sample ID: CCV1 GRO_99092	Batch ID: GRO_S-12/2/ Test Code: SW8015B	Test Code:	SW8015B	Units: µg/Kg		Analysis	Analysis Date 11/16/99	Prep Date:
Client ID:	9911023	Run ID:	GC-1_991116B	60		SeqNo:	21626	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	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-12/2/	Test Code:	Test Code: SW8015B	Units: µg/Kg		Analysis	Analysis Date 11/16/99	Prep Date:
Client ID:	9911023	Run ID:	GC-1_991116B	Ō		SeqNo:	21637	
Analyte	Result	PQL	SPK value	SPK value SPK Ref Val	%REC	LowLimit	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	

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

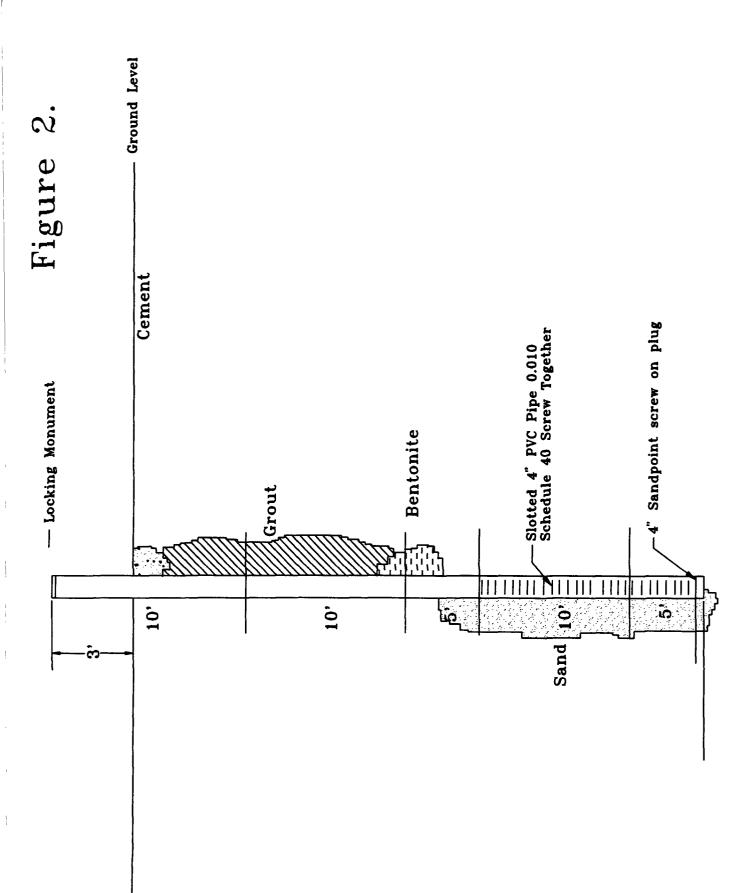
On October 4, 1995 CES began excavating contaminated soil from the separator pit on the above referenced well location. The excavation was recently completed with an approximate 150 cubic yards of contaminated soil removed. The soil removed was evenly distributed on the surface where it could be soil 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.



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	В	ND	PPB
1040-404	DILALIA Method 002.2	Ť	ND	PPB
		Ë	ND	PPB
		X	1.08	PPB
Fed6-405	Metals EPA Method 600/4	Arsenic	<0.005	PPM
1640-405	Wetals Li A Without 600/4	Barium	<0.005	PPM
		Cadmium	<0.002	PPM
		Chromium	< 0.02	PPM
		Lead	< 0.005	PPM
		Mercury	< 0.001	PPM
		Selenium	< 0.006	
		Silver	<0.01	PPM
Fed6-406	Cation / Anion EPA Method 8310	Total Hardness	101	PPM
1 640-400	Cation / Amon El A Method 6510	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 Sulfate	20.0 1,360	PPM 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:

Condition:

404 - 407

Lab ID:

2066

Sample Matrix:

Preservative:

Water

Cool Intact Report Date:

Date Sampled:

12/09/95 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.

Quality Control:

Surrogate

Percent Recovery

Acceptance Limits

Trifluorotoluene

100

88 - 110%

Bromofluorobenzene

86

86 - 115%

Dering RC

Reference:

Method 602.2, Purgeable Aromatics; Federal Register, Vol. 49, No. 209,

Oct. 1984.

Comments:



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

(mg/L)	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:

Duish C



API Suite Contract Environmental Services, Inc.

Project ID:

Largo Wells

404 - 407

Date Reported: Date Sampled:

01/09/96

Sample ID:

12/05/95

Laboratory ID:

2066

Time Sampled:

NA

Sample Matrix:

Water

Date Received:

12/05/95

Parameter		Analytical Result	Units
General	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	***
Anions	Total Alkalinity as CaCO₃	497	mg/L
	Bicarbonate Alkalinity as CaCO ₃	497	mg/L
	Carbonate Alkalinity as CaCO ₃	NA	mg/L
	Hydroxide Alkalinity as CaCO ₃	NA	mg/L
	Chloride	20.0	mg/L
	Sulfate	1,360	mg/L
	Nitrate + Nitrite - N	NA	
	Nitrate - N	NA	
	Nitrite - N	NA	
Cations	Total Hardness as CaCO ₃	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
Data Validation			Acceptance Le
	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.



Polyaromatic Hydrocarbons EPA Method 8310

Contract Environmental Services, Inc.

Project ID: Sample ID:

Largo Wells 404 - 407 Report Date:

01/05/96 12/05/95

Sample ID: Lab ID: Sample Matrix: 404 - 407 2066 Water Date Sampled: Date Received: Date Extracted:

Date Analyzed:

12/05/95 12/11/95 12/21/95

Preservative: Condition:

Cool Intact

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

Denie M

Please Fill Out Thoroughly. White/Yellow: Analytica Pink: Client Shaded areas for lab use only. Page of COMMENTS Other (specify): METALS RCRA Metals TCLP (1311) PCRA Metals (Total) DSS NASA \succ Priority Pollutants Relinquished By: Received By: Ofher (specify): WATER ANALYSES Oil and Grease Nutrients: NH4+ / NO2- / NO3- / TKN Solids: TDS / TSS / SS **CHAIN OF CUSTODY** BOD / Fecal / Total Coliform Specific Anions (specify): Specific Cations (specify): Cation / Anion × × × Relinquished By: Other (specify): Received By: TCLP Extraction Polynuclear Aromatic Hydrocarbons (8100) × \times ORGANIC ANALYSES Base / Neutral / Acid GC/MS (625 / 8270) 12.5 B Volatiles GC/MS (624 / 8240 / 8260) PONTAM; ENV. SERV. Time: Date: Herbicides (615 / 8150) Chlorinated Pesticides / PCBs (608 / 8080) (f.£02 \ f.S03) selitsloV AWQ2 Chlorinated Hydrocarbons (8010) Sampled By: Aromatic HCs BTEX/MTBE (602 / 8020) × Required Turnaround Time (Prior Authorization Required for Rush) | Received By: (ORD) enilossD Сотрапу: Company: Gasoline / Diesel (mod. 8015) Petroleum Hydrocarbons (418.1) (5°. 75) Dab ID Custody Seals: Y / N / NA Sample Receipt 35-1198 EWIROMMENTAL LABORATORY 807 S. CARLTON • FARMINGTON, NM 87401 • (505) 326-2395 Matrix EN Lair DRyA -Received Intact: _ No. Containers: Received Cold: すっている intland Time **4NALYTICA** 21120 32.4 Date PROJECT MANAGER: 1 : Project Information Analytica Lab I.D.: 100 - 4063 104 101 Sample ID 108-41 Company: Company: Proj. Name: Shipped Via: Address: Address: Phone: Bill To: P. O. No: Proj. #: Fax:

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

RECEIVED

October 19, 1995

OCT 3 1 1995

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

Environmental Bureau Oil Conservation Division

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>	Sample No.	PID(PPM)	Location
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>	Sample No.	PID(PPM)	Location
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.

Sincerel

Shawn A. Adams

Contract Environmental Services, Inc.

Mr. Denny Foust, NMOCD Farmington

Mr. Bill Liese, BLM Farmington

