

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

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

Form C-141  
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in  
accordance with 19.15.29 NMAC.

### Release Notification and Corrective Action

#### OPERATOR

☐ Initial Report ☒ Final Report

Name of Company: BP	Contact: Jeff Peace	
Address: 200 Energy Court, Farmington, NM 87401	Telephone No.: 505-326-9479	
Facility Name: Gallegos Canyon Unit 237E	Facility Type: Natural gas well	
Surface Owner: Private	Mineral Owner: Federal	API No. 3004526269

#### LOCATION OF RELEASE

Unit Letter C	Section 13	Township 28N	Range 13W	Feet from the 1,060	North/South Line North	Feet from the 1,450	East/West Line West	County: San Juan
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Latitude 36.66628 Longitude 108.17432

#### NATURE OF RELEASE

Type of Release: condensate/oil	Volume of Release: unknown	Volume Recovered: none
Source of Release: below grade tank	Date and Hour of Occurrence: unknown	Date and Hour of Discovery: March 31, 2014; 3:45 PM
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour:	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse:	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\* During removal of the below grade tank (BGT) soil underneath the tank was sampled. Analysis results showed TPH values of 150 ppm by Method 418.1 and 840 ppm by Method 8015B, and benzene was 0.60 ppm, indicating a release occurred at some time. Impacted soil was excavated and removed.

Describe Area Affected and Cleanup Action Taken.\* Impacted soil under the BGT was excavated and removed. Subsequent soil samples resulted in TPH of 132 ppm by Method 418.1 and 53.5 ppm by Method 8015B and non-detect for benzene. Approximately 2.5 cubic yards of impacted soil were removed and transported to a landfarm for treatment. The excavated area was backfilled with clean soil and compacted. Attached are lab analyses and a summary of the remediation.

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

Signature: <i>Jeff Peace</i>	OIL CONSERVATION DIVISION	
Printed Name: Jeff Peace	Approved by Environmental Specialist: <i>Craig Smith</i>	
Title: Field Environmental Coordinator	Approval Date: 4/13/15	Expiration Date:
E-mail Address: peace.jeffrey@bp.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: January 30, 2015	Phone: 505-326-9479	

\* Attach Additional Sheets If Necessary

#NCS 15103 42 272

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BP America: GCU 237E  
(C) Sec 13 – T28N – R13W  
San Juan County, New Mexico

Summary Record of Impact Remediation

March 27, 2014 Initial inspection of well site and 95 BGT location following recent storm flood event that deposited up to 2 feet of sand on entire location, filling up the BGT with rain water and displacing any fluids that may have been inside the BGT. Obvious soil staining with hydrocarbons in the surface sand surrounding the BGT. Well site located on private property (Bolack Ranch) on a steep hillside.

Site Closure Standard (from BGT Permit) Determined at 5,000 ppm TPH based on:

Horizontal Distance to Surface Water > 1,000 feet (0 points)

Nearest Water Well > 1,000 feet (0 points)

Depth to Groundwater > 100 feet (0 points)

March 31, 2014 Work crew removes BGT with crane. A 5-point composite soil sample immediately below tank collected with hand auger. Field OVM reading = 1,190 ppm, Lab TPH (418.1) = 150 ppm, TPH (8015B) = 840 ppm, Benzene = 0.60 ppm, Chlorides = 130 ppm. Well left shut-in pending workplan to remove sediment and reset production equipment.

October 27, 2014 Work crew strips up to 2 feet of sediment from well pad surface and builds berm between the pad surface and the surrounding hillside. Remove approximate 1 foot of sediment from prior BGT depression and find that BGT had been set in a sandstone "vault" 12' x 12' x 6' deep. Sample 5-point composite of the sandstone surface below the BGT using trackhoe. Field OVM reading = 27 ppm, Lab TPH (418.1) = 132 ppm, TPH (8015B) = 53.5 ppm, Benzene = ND, Chlorides = 42.6 ppm.

October 28, 2014 Following receipt of laboratory report, field crew backfills BGT depression. Approximate soil volume removed for remediation at Crouch Mesa Landfarm = 2.5 cubic yards.



CLIENT:

BP

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

API #: 30-045-26269

TANK ID  
(if applicable): A**FIELD REPORT:**(circle one): BGT CONFIRMATION / RELEASE INVESTIGATION / OTHER:

PAGE #: 1 of 1

**SITE INFORMATION:**

SITE NAME: GCU 237E

QUAD/UNIT: C SEC: 13 TWP: 28N RING: 13W PM: NM CNTY: SJ ST: NM

1/4-1/4 FOOTAGE: 1060 FNL x 1450 FWL

LEASE TYPE: FEDERAL / STATE / FEE / INDIAN

LEASE # NMNM 78391C PROD. FORMATION:

CONTRACTOR: STRIKE <sup>BREAT</sup> (SULTMEYER)

DATE STARTED: 10/27/2014

DATE FINISHED: 10/27/2014

ENVIRONMENTAL

SPECIALIST(S): JCB

**REFERENCE POINT:**

WELL HEAD (W.H.) GPS COORD.: 36.66655 x 108.17462 GL ELEV.: 5634

1) 95BGT(A) GPS COORD.: 36.66628 x 108.17432 DISTANCE/BEARING FROM W.H.: 144' S 34 E

2) GPS COORD.: DISTANCE/BEARING FROM W.H.:

3) GPS COORD.: DISTANCE/BEARING FROM W.H.:

4) GPS COORD.: DISTANCE/BEARING FROM W.H.:

**SAMPLING DATA:**

CHAIN OF CUSTODY RECORD(S) # OR LAB USED: ENVIRTECH

1) SAMPLE ID: 95BGT 5-pt @ 6' SAMPLE DATE: 10/27/14 SAMPLE TIME: 1300 LAB ANALYSIS: TPH/GEX/CL

OVM  
READING  
(ppm)  
27.0

2) SAMPLE ID: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:

3) SAMPLE ID: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:

4) SAMPLE ID: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:

**SOIL DESCRIPTION:**SOIL TYPE: SAND / SILTY SAND / SILT / SILTY CLAY / CLAY / GRAVEL / OTHER BEDROCK SANDSTONE

SOIL COLOR: V-Lite Gray

COHESION (ALL OTHERS): NON COHESIVE / SLIGHTLY COHESIVE / COHESIVE / HIGHLY COHESIVECONSISTENCY (NON COHESIVE SOILS): LOOSE / FIRM / DENSE / VERY DENSEMOISTURE: DRY / SLIGHTLY MOIST / MOIST / WET / SATURATED / SUPER SATURATEDSAMPLE TYPE: GRAB / COMPOSITE # OF PTS.: 5

DISCOLORATION/STAINING OBSERVED: YES / NO EXPLANATION: V-Lite Gray

PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC

DENSITY (COHESIVE CLAYS &amp; SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD

HC ODOR DETECTED: YES / NO EXPLANATION:

ANY AREAS DISPLAYING WETNESS: YES / NO EXPLANATION:

**SITE OBSERVATIONS:**

LOST INTEGRITY OF EQUIPMENT: YES / NO EXPLANATION: BGT - OVERFLOW

APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED: YES / NO EXPLANATION: STAINING

EQUIPMENT SET OVER RECLAIMED AREA: YES / NO EXPLANATION:

OTHER: 2 Feet of Sand Deposits on well Pad Removed Prior to BGT Sampling.  
BGT Depression Excavated into Sandstone.

SOIL IMPACT DIMENSION ESTIMATION: 12 ft. X 12 ft. X 1 ft. EXCAVATION ESTIMATION (Cubic Yards): 5 ±

DEPTH TO GROUNDWATER: &gt;100 NEAREST WATER SOURCE: &gt;1000 NEAREST SURFACE WATER: &gt;1000 NMOC DTPH CLOSURE STD: 5000 ppm

**SITE SKETCH**BGT Located: off / on site

PLOT PLAN circle: attached



WELL

N

OVM CALIB. READ. = 53.1 ppm  
 OVM CALIB. GAS = 100 ppm  
 TIME 0620 am/pm DATE: RF=0.52

**MISCELL. NOTES**

WO: N15402309

PO #: 4300289440

PK:

PJ #:

Permit date(s): 6/9/2010

OCD Appr. date(s): 3/28/2014

Tank ID: OVM = Organic Vapor Meter  
ppm = parts per millionA BGT Sidewalls Visible: Y / N

BGT Sidewalls Visible: Y / N

BGT Sidewalls Visible: Y / N

Magnetic declination: 10° E

NOTES: BGT = BELOW-GRADE TANK; E.D. = EXCAVATION DEPRESSION; B.G. = BELOW GRADE; B = BELOW; T.H. = TEST HOLE; ~ = APPROX.; W.H. = WELL HEAD;  
 T.B. = TANK BOTTOM; PBGT = PREVIOUS BELOW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL; NA = NOT  
 APPLICABLE OR NOT AVAILABLE; SW = SINGLE WALL; DW = DOUBLE WALL; SB = SINGLE BOTTOM; DB = DOUBLE BOTTOM.

NOTES:

ONSITE:



Blagg Engineering  
PO Box 87  
Bloomfield NM, 87413

Project Name: GCU 237E  
Project Number: 94034-0011  
Project Manager: Bill Blagg

**Reported:**  
29-Oct-14 11:47

### Analytical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
95 BGT 5-Pt @ 6'	P410115-01A	Soil	10/27/14	10/27/14	Glass Jar, 4 oz.

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Blagg Engineering  
PO Box 87  
Bloomfield NM, 87413

Project Name: GCU 237E  
Project Number: 94034-0011  
Project Manager: Bill Blagg

Reported:  
29-Oct-14 11:47

**95 BGT 5-Pt @ 6'**  
**P410115-01 (Solid)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
<b>Volatile Organics by EPA 8021</b>									
Benzene	ND	0.10	mg/kg	1	1444007	10/27/14	10/28/14	EPA 8021B	
Toluene	ND	0.10	mg/kg	1	1444007	10/27/14	10/28/14	EPA 8021B	
Ethylbenzene	ND	0.10	mg/kg	1	1444007	10/27/14	10/28/14	EPA 8021B	
p,m-Xylene	ND	0.20	mg/kg	1	1444007	10/27/14	10/28/14	EPA 8021B	
o-Xylene	ND	0.10	mg/kg	1	1444007	10/27/14	10/28/14	EPA 8021B	
Total Xylenes	ND	0.10	mg/kg	1	1444007	10/27/14	10/28/14	EPA 8021B	
Total BTEX	ND	0.10	mg/kg	1	1444007	10/27/14	10/28/14	EPA 8021B	
Surrogate: 4-Bromochlorobenzene-PID		101 %		50-150	1444007	10/27/14	10/28/14	EPA 8021B	
<b>Nonhalogenated Organics by 8015</b>									
Gasoline Range Organics (C6-C10)	ND	9.98	mg/kg	1	1444007	10/27/14	10/28/14	EPA 8015D	
Diesel Range Organics (C10-C28)	53.5	39.9	mg/kg	2	1444003	10/27/14	10/28/14	EPA 8015D	
Surrogate: o-Terphenyl		91.7 %		50-200	1444003	10/27/14	10/28/14	EPA 8015D	
Surrogate: 4-Bromochlorobenzene-FID		91.8 %		50-150	1444007	10/27/14	10/28/14	EPA 8015D	
<b>Total Petroleum Hydrocarbons by 418.1</b>									
Total Petroleum Hydrocarbons	132	35.0	mg/kg	1	1444008	10/27/14	10/27/14	EPA 418.1	
<b>Cation/Anion Analysis</b>									
Chloride	42.6	9.82	mg/kg	1	1444002	10/27/14	10/27/14	EPA 300.0	

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Blagg Engineering  
PO Box 87  
Bloomfield NM, 87413

Project Name: GCU 237E  
Project Number: 94034-0011  
Project Manager: Bill Blagg

Reported:  
29-Oct-14 11:47

**Volatile Organics by EPA 8021 - Quality Control**  
**Envirotech Analytical Laboratory**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 1444007 - Purge and Trap EPA 5030A**

**Blank (1444007-BLK1)**

Prepared: 27-Oct-14 Analyzed: 28-Oct-14

Benzene	ND	0.10	mg/kg							
Toluene	ND	0.10	"							
Ethylbenzene	ND	0.10	"							
p,m-Xylene	ND	0.20	"							
o-Xylene	ND	0.10	"							
Total Xylenes	ND	0.10	"							
Total BTEX	ND	0.10	"							

Surrogate: 4-Bromochlorobenzene-PID 0.402 " 0.399 101 50-150

**LCS (1444007-BS1)**

Prepared: 27-Oct-14 Analyzed: 28-Oct-14

Benzene	20.2	0.10	mg/kg	19.9		101	75-125			
Toluene	20.5	0.10	"	19.9		103	70-125			
Ethylbenzene	20.6	0.10	"	19.9		103	75-125			
p,m-Xylene	41.7	0.20	"	39.9		105	80-125			
o-Xylene	20.7	0.10	"	19.9		104	75-125			

Surrogate: 4-Bromochlorobenzene-PID 0.409 " 0.399 103 50-150

**Matrix Spike (1444007-MS1)**

Source: P410113-01

Prepared: 27-Oct-14 Analyzed: 28-Oct-14

Benzene	20.5	0.10	mg/kg	20.0	ND	103	75-125			
Toluene	20.9	0.10	"	20.0	ND	104	70-125			
Ethylbenzene	20.9	0.10	"	20.0	ND	104	75-125			
p,m-Xylene	42.1	0.20	"	40.0	ND	105	80-125			
o-Xylene	20.9	0.10	"	20.0	ND	104	75-125			

Surrogate: 4-Bromochlorobenzene-PID 0.405 " 0.400 101 50-150

**Matrix Spike Dup (1444007-MSD1)**

Source: P410113-01

Prepared: 27-Oct-14 Analyzed: 28-Oct-14

Benzene	20.2	0.10	mg/kg	20.0	ND	101	75-125	1.40	15	
Toluene	20.4	0.10	"	20.0	ND	102	70-125	2.09	15	
Ethylbenzene	20.6	0.10	"	20.0	ND	103	75-125	1.09	15	
p,m-Xylene	41.8	0.20	"	40.0	ND	105	80-125	0.856	15	
o-Xylene	20.7	0.10	"	20.0	ND	104	75-125	0.935	15	

Surrogate: 4-Bromochlorobenzene-PID 0.403 " 0.400 101 50-150

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Blagg Engineering  
PO Box 87  
Bloomfield NM, 87413

Project Name: GCU 237E  
Project Number: 94034-0011  
Project Manager: Bill Blagg

Reported:  
29-Oct-14 11:47

### Nonhalogenated Organics by 8015 - Quality Control

#### Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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#### Batch 1444003 - DRO Extraction EPA 3550M

##### Blank (1444003-BLK1)

Prepared: 27-Oct-14 Analyzed: 28-Oct-14

Diesel Range Organics (C10-C28)	ND	25.0	mg/kg							
Surrogate: o-Terphenyl	40.8		"	40.0		102	50-200			

##### LCS (1444003-BS1)

Prepared: 27-Oct-14 Analyzed: 28-Oct-14

Diesel Range Organics (C10-C28)	535	24.9	mg/kg	499		107	38-132			
Surrogate: o-Terphenyl	44.1		"	39.9		111	50-200			

##### Matrix Spike (1444003-MS1)

Source: P410102-01

Prepared: 27-Oct-14 Analyzed: 28-Oct-14

Diesel Range Organics (C10-C28)	523	30.0	mg/kg	500	ND	105	38-132			
Surrogate: o-Terphenyl	42.5		"	40.0		106	50-200			

##### Matrix Spike Dup (1444003-MSD1)

Source: P410102-01

Prepared: 27-Oct-14 Analyzed: 28-Oct-14

Diesel Range Organics (C10-C28)	560	30.0	mg/kg	500	ND	112	38-132	6.81	20	
Surrogate: o-Terphenyl	45.5		"	40.0		114	50-200			

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Blagg Engineering  
PO Box 87  
Bloomfield NM, 87413

Project Name: GCU 237E  
Project Number: 94034-0011  
Project Manager: Bill Blagg

Reported:  
29-Oct-14 11:47

**Nonhalogenated Organics by 8015 - Quality Control**  
**Envirotech Analytical Laboratory**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
<b>Batch 1444007 - Purge and Trap EPA 5030A</b>										
<b>Blank (1444007-BLK1)</b>				Prepared: 27-Oct-14 Analyzed: 28-Oct-14						
Gasoline Range Organics (C6-C10)	ND	9.98	mg/kg							
Surrogate: 4-Bromochlorobenzene-FID	0.367		"	0.399		92.1	50-150			
<b>LCS (1444007-BS1)</b>				Prepared: 27-Oct-14 Analyzed: 28-Oct-14						
Gasoline Range Organics (C6-C10)	287	9.97	mg/kg	291		98.5	80-120			
Surrogate: 4-Bromochlorobenzene-FID	0.369		"	0.399		92.7	50-150			
<b>Matrix Spike (1444007-MS1)</b>				<b>Source: P410113-01</b>		Prepared: 27-Oct-14 Analyzed: 28-Oct-14				
Gasoline Range Organics (C6-C10)	296	9.99	mg/kg	292	ND	101	75-125			
Surrogate: 4-Bromochlorobenzene-FID	0.370		"	0.400		92.6	50-150			
<b>Matrix Spike Dup (1444007-MSD1)</b>				<b>Source: P410113-01</b>		Prepared: 27-Oct-14 Analyzed: 28-Oct-14				
Gasoline Range Organics (C6-C10)	292	9.99	mg/kg	292	ND	100	75-125	1.31	15	
Surrogate: 4-Bromochlorobenzene-FID	0.368		"	0.400		92.0	50-150			

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Blagg Engineering  
PO Box 87  
Bloomfield NM, 87413

Project Name: GCU 237E  
Project Number: 94034-0011  
Project Manager: Bill Blagg

**Reported:**  
29-Oct-14 11:47

**Total Petroleum Hydrocarbons by 418.1 - Quality Control**

**Envirotech Analytical Laboratory**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 1444008 - 418 Freon Extraction**

**Blank (1444008-BLK1)**

Prepared & Analyzed: 27-Oct-14

Total Petroleum Hydrocarbons ND 34.9 mg/kg

**Duplicate (1444008-DUP1)**

**Source: P410105-01**

Prepared & Analyzed: 27-Oct-14

Total Petroleum Hydrocarbons ND 35.0 mg/kg ND 30

**Matrix Spike (1444008-MS1)**

**Source: P410105-01**

Prepared & Analyzed: 27-Oct-14

Total Petroleum Hydrocarbons 1980 34.9 mg/kg 2020 ND 98.2 80-120

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laboratory@envirotech-inc.com



Blagg Engineering	Project Name:	GCU 237E	Reported: 29-Oct-14 11:47
PO Box 87	Project Number:	94034-0011	
Bloomfield NM, 87413	Project Manager:	Bill Blagg	

### Cation/Anion Analysis - Quality Control

#### Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
<b>Batch 1444002 - Anion Extraction EPA 300.0</b>										
<b>Blank (1444002-BLK1)</b>				Prepared & Analyzed: 27-Oct-14						
Chloride	ND	9.91	mg/kg							
<b>LCS (1444002-BS1)</b>				Prepared & Analyzed: 27-Oct-14						
Chloride	488	9.95	mg/kg	498		98.0	90-110			
<b>Matrix Spike (1444002-MS1)</b>				Source: P410105-01 Prepared & Analyzed: 27-Oct-14						
Chloride	489	9.87	mg/kg	494	ND	99.1	80-120			
<b>Matrix Spike Dup (1444002-MSD1)</b>				Source: P410105-01 Prepared & Analyzed: 27-Oct-14						
Chloride	498	9.99	mg/kg	500	ND	99.8	80-120	1.84	20	

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# CHAIN OF CUSTODY RECORD

17948

Client: <b>BLAGG Engineering Inc.</b> <b>BP America</b>			Project Name / Location: <b>GCW 237E</b>			ANALYSIS / PARAMETERS														
Email results to: <b>JEFF Blagg</b> <b>JEFF Blagg</b> <b>Nelson Velaz</b>			Sampler Name: <b>J. Blagg</b>			TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	RCI	TCLP with H/P	CO Table 910-1	TPH (418.1)	CHLORIDE			Sample Cool	Sample Intact	
Client Phone No.: <b>505-320-1183</b>			Client No.: <b>94034-0011</b>																	
Sample No./ Identification	Sample Date	Sample Time	Lab No.	No./Volume of Containers	Preservative															
					HNO <sub>3</sub>	HCl														
<b>95 BGT</b> <b>5-pe @ 6"</b>	<b>10/27/14</b>	<b>1300</b>	<b>P410115-01</b>	<b>1 x 402</b>				<b>X</b>	<b>X</b>						<b>X</b>	<b>X</b>			<b>X</b>	<b>X</b>
Relinquished by: (Signature) <b>J. Blagg</b>					Date	Time	Received by: (Signature) <b>M. Amgoe</b>										Date	Time		
Relinquished by: (Signature) <b>J. Blagg</b>							Received by: (Signature)													
Sample Matrix																				
Soil <input checked="" type="checkbox"/> Solid <input type="checkbox"/> Sludge <input type="checkbox"/> Aqueous <input type="checkbox"/> Other <input type="checkbox"/>																				
<input type="checkbox"/> Sample(s) dropped off after hours to secure drop off area.					<b>3.8</b>															

