

### Highlander Environmental Corp.

Midland, Texas

August 12, 2005

Mr. Larry Johnson Environmental Engineer Specialist Oil Conservation Division- District I 1625 N. French Drive P. O. Box 1980 Hobbs, New Mexico 88240

#### Re: Closure Report for the Pogo Producing Company, Kelly State Abandoned Blow Down Pit, Located in Section 16, Township 23 South, Range 37 East, Lea County New Mexico.

Dear Mr. Johnson:

As previously reported, Highlander Environmental Corp. (Highlander) was contacted by Pogo Producing Company (Pogo) to assess and close an abandoned pit located at the Kelly State Lease. The abandoned pit was located approximately 150' northwest of the Pogo/Kelly State Tank Battery. According to the Bureau of Land Management Map, the surface and land minerals are owned by the State of New Mexico (State Lands). The pit location is Unit letter M, Section 16, Township 23 South, Range 37 East, Lea County, New Mexico (Site). The Site is shown in Figure 1.

#### Background

Pogo Producing Company recently acquired this lease and noted an abandoned pit, which had been inactive for a number of years. The pit measured 60' x 60' with a bottom depth of 3'to 4' below surface. An approximately 1' to 2' thickness of asphaltic soil was observed in the bottom of the pit. The berm material, around the pit, also appeared to be impacted with hydrocarbon. To properly close the pit, boreholes were installed to define the extent of the impact. A report and work plan titled, "Subsurface Investigation and Work Plan for the Pogo Producing Company, Abandoned Kelly State Blow Down Pit, Located in Section 16, Township 23 South, Range 37 East, Lea County New Mexico, was submitted to the New Mexico Oil Conservation Division (NMOCD) on July 29, 2004.

The work plan proposed to remove and dispose of impacted hydrocarbon material in and around the pit. In order to remove the highest detected chloride, the bottom was to be excavated to a depth 10.0' below pit bottom. All excavated material was to be transported to Sundance Services for disposal, and once the material was removed, the excavation would be backfilled for closure.

#### **Groundwater and Regulatory**

According to the New Mexico State Engineer Office W.A.T.E.R.S. database, Average Depth to Water Report, a well located in Section 16, Township 23 South, Range 37 East, has an average

water level of 115.
You wood
PQQ - 1891
Facility - FPAC 0603837 139 1910 N. Big Spring Midland, Texas 79705
Fuciliary - + FACOD SOSTIST
1910 N. Big Spring Mialana, 1exas 79705
Vincident -n PAC 0603837367
application-pPACO603837471

(432) 682-4559

Fax (432) 682-3946

A risk-based evaluation was performed for the Site in accordance with the New Mexico Oil Conservation Division (NMOCD) Guidelines for Remediation of Leaks, Spills and Releases, dated August 13, 1993. The guidelines require a risk-based evaluation of the site to determine recommended remedial action levels (RRAL) for benzene, toluene, ethylbenzene and xylene (collectively referred to as BTEX) and total petroleum hydrocarbons (TPH) in soil. The proposed RRAL for benzene was determined to be 10 parts per million (ppm) or milligrams per kilogram (mg/kg) and 50 ppm for total BTEX (sum of benzene, toluene, ethylbenzene and xylene). Based upon the depth to groundwater, the proposed RRAL for TPH is 5,000 mg/kg.

#### **Pit Excavation**

Excavation or the pit began on April 12, 2004 and concluded on April 15, 2005. The excavation dimensions measured approximately 65' x 90' with depths varying from 7' to 12' below ground surface (bgs). Bottom hole and sidewall samples were collected on April 14 and 15, 2005.

All of the samples were collected in laboratory supplied containers and properly preserved during transport. Soil samples were submitted under chain-of-custody control and analyzed for Total Petroleum Hydrocarbons (TPH) by method SW 846 8015B, and Benzene, Toluene, Ethylbenzene and Xylenes (BTEX) by EPA method 602/8021B, and chloride by method SW 846 9253. The soil sample results are summarized in Table 1. The pit excavation and sample locations are shown on Figure 2. The laboratory report and chain of custody are enclosed in Appendix A.

#### **Soil Sampling Results**

None of the bottom hole or sidewall samples exceeded the RRAL for TPH or BTEX. All chloride concentrations were well below 1,000 mg/kg, ranging from 49.5 mg/kg to 716 mg/kg. The remaining chloride concentrations were 375 mg/kg or less. As such, the residual chloride in the subsurface should not pose any environmental concern. The excavation was backfilled with clean fill material and a total of 2380 yds<sup>3</sup> of excavated soil was hauled to Sundance Services for disposal.

#### Conclusions

Based on the assessment, remediation, and confirmatory sampling performed, Pogo requests closure for this site. If you have any questions or comments on the closure report, please call me at (432) 682-4559.

Respectfully submitted, Highlander Environmental Corp.

Ike Tavarez, P.G. Project Manager/Geologist

cc:

Don Riggs – Pogo Producing Company Pat Ellis – Pogo Producing Company

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Highlander Environmental Corp.



### NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON Governor Joanna Prukop Cabinet Secretary Mark E. Fesmire, P.E. Director Oil Conservation Division

February 6, 2006

Mr. Pat Ellis EllisP@pogoproducing.com Pogo Producing Company 300 N. Marienfield Midland, TX 79701-7340

Re: Kelly State Abandon Blowdown Pit Closure Report Site Location: Sec 16 – T23S - R37E Closure Report Dated: August 12, 2005

Dear Mr. Ellis,

The New Mexico Oil Conservation Division (OCD) reviewed the above referenced report Submitted by your agent, Highlander Environmental Corp. (HEC). Based on information provided, the site requires no further action.

Please be advised that OCD approval does not relieve Pogo Producing Company of responsibility should operations result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve Pogo Producing Company of responsibility for compliance with any federal, state or local laws and/or regulations. If you have any questions or need assistance please call me at (505) 393-6161, x111 or e-mail <u>larry.Johnson@state.nm.us</u>

Sincerely,

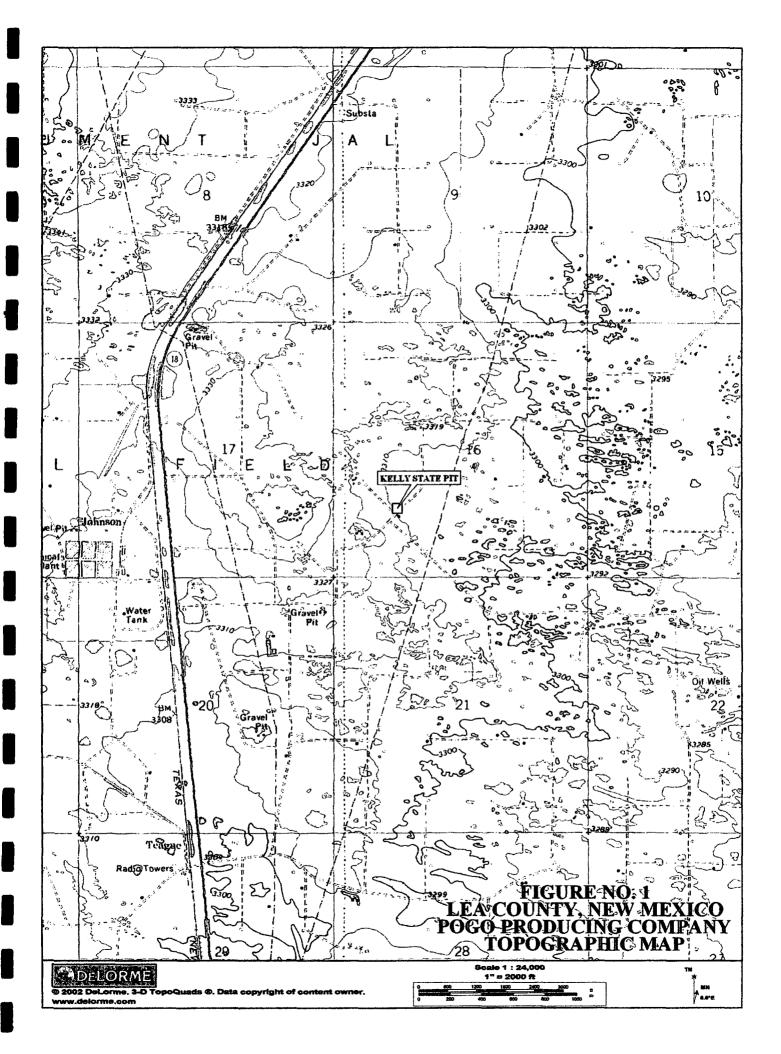
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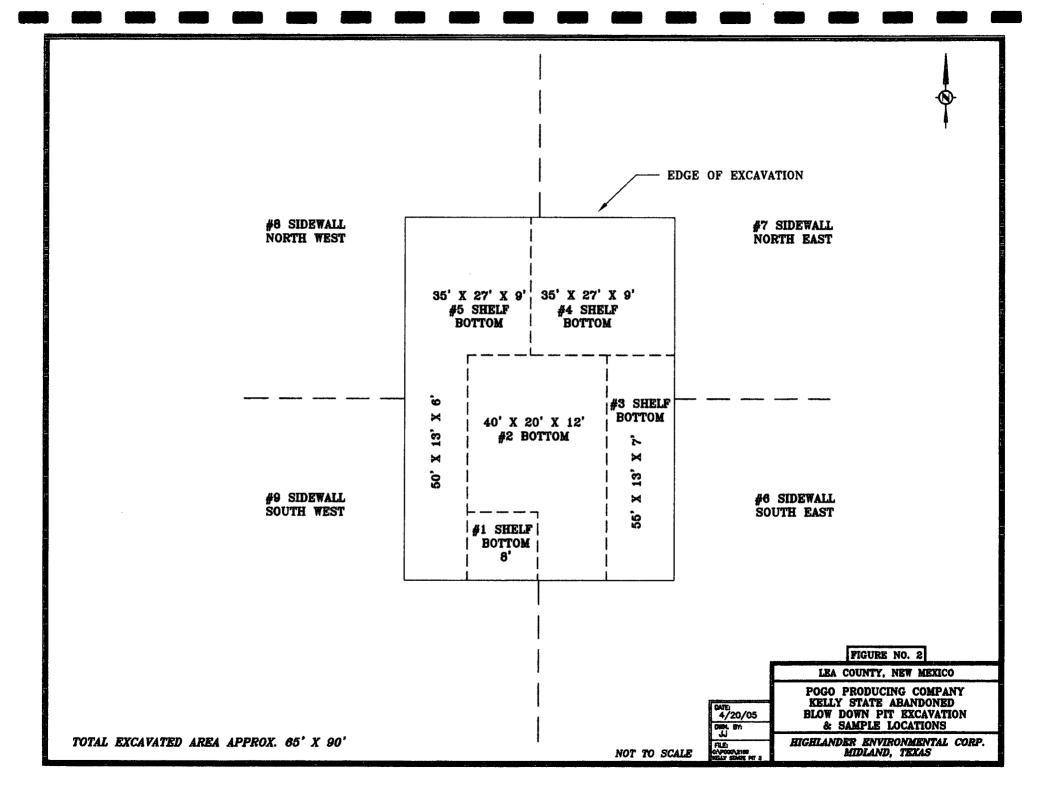
Larry Johnson - Environmental Engineer

CC: Wayne Price - Environmental Bureau Chief Chris Williams - District I Supervisor Paul Sheeley- Environmental Engineer

		SIT	E INFORMAT	TION	
<b>General Site Inf</b>	ormations				
Site:	BIGS STATE		Abandoned Blow		18° n
Company:		Pogo Produc	ing Company (Arc	h Petrole	um) / 🔊 🖄
Section, Towns	hip and Range				. Ellipe or. 6
Unit Letter:	<u>_</u>	IM			A NUC wed
Lease Number:		-			8 101263
County:		Lea			14 1900
GPS:		32° 18' 3.97",	103° 10' 19.69"		12
Surface Owner:		State Land			
Mineral Owner:		State Land			
Directions:		Eunice New Me	exico intersection of 1	8 and 234,	go 10.7 miles south near mile marker 2
		turn left (east) i	nto lease (gate), go 0	).6 miles do	wn lease road and turn left,
		The second s	tank battery. Pit loca		
ReleaseDatar					
Date Released:			t inactive for a num		والمستخلفا فأنعاث ومحجوب النشاق المتشري ومحدون ومنتكل بمنصاب والمحدد والمتعاد والمحد ألغا الناب المتحد والمحد
Type Release:			impacted with prod		
Source of Contar	nination ·	blowdown pit	unpacted with prov	uccu walt	
Fluid Released:		not known			
Fluids Recovered	<del>1</del> .	-			<u> </u>
	<i>.</i>	<u> </u>			
officialCommu	nication				
Name:	Pat Ellis		Don Riggs	and the straight of the straig	like Tavarez
Company:	Pogo Producir		Pogo Producing Co		Highlander Environmental Corp.
Address:					
	300 N. Marien	tela St.	5 Greenway Piaza,	, Suite 2700	1910 N. Big Spring
P.O. Box	Box 10340	<u></u>			
City:	Midland Texas	, 79701-7340	Houston, Texas 77	/046	Midland, Texas
Phone number:	(432) 685-810	0	(713) 297-5045		(432) 692- 4559
Email:	EllisP@pogop	roducing.com	riggsd@pogoprodu	<u>icing.com</u>	itavarez@hec-enviro.com
Ranking Criteria					
Depth to Groundv	vater:		Ranking Score		Site Data
<50 ft			20		
50-99 ft >100 ft.			10		Average Depth >100 BS
- 100 IL.				L	Average Depth > 100 BS
WellHead Protect	ion:		Ranking Score		Site Data
Water Source <1,		200 ft.	20		None
Water Source >1,			0		
Surface Body of V	Nater:		Ranking Score		Site Data
		<u></u>	<u>20</u> 10		None None
		·····	0		INUIG
200 ft - 1,000 ft.					والأخاد الاجريبي ويالانا المحجب وتوالع معتقبون والمحد والمراجع
200 ft - 1,000 ft.					
<200 ft. 200 ft - 1,000 ft. >1,000 ft. <b>Tot</b> a	al Ranking Sco		0		
200 ft - 1,000 ft. >1,000 ft.	al Ranking Sco	)/@:	0		
200 ft - 1,000 ft. >1,000 ft.	al Ranking Sco				3
200 ft - 1,000 ft. >1,000 ft.	ni Ranking Sco		0 oil(RRALk(mg/kg)) Total BTEX	TPH	

#### **FIGURES**







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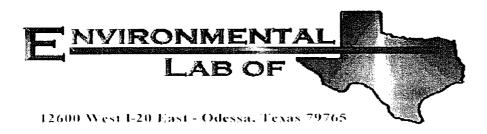
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# Table 1Pogo Producing CompanyKelly State Abandon PitExcavation Sample ResultsLea County, New Mexico

4/ 4/ 4/	ampled 14/2005 14/2005 15/2005	C6-C12   <25.0   17.9   <25.0	C12-C35 188 149	Total 188 167	(mg/kg) <0.025	(mg/kg) <0.025	(mg/kg) <0.025	(mg/kg) <0.025	<b>(mg/kg)</b> 716
4/	14/2005	17.9			<0.025	< 0.025	< 0.025	<0.025	716
4/	-		149	167					
	15/2005	(25.0		10/	< 0.025	< 0.025	< 0.025	< 0.025	373
4/		<25.0	29.9	29.9	< 0.025	< 0.025	<0.025	< 0.025	199
<del></del>	15/2005	241	1,400	1,640	< 0.025	< 0.025	0.0808	0.4739	274
4/	15/2005	782	3,660	4,440	<0.025	0.0435	0.160	0.887	375
e 4/	15/2005	<25.0	99.9	99.9	<0.025	<0.025	< 0.025	<0.025	90.7
e 4/	15/2005	<25.0	310	310	< 0.025	< 0.025	<0.025	< 0.025	49.5
e 4/	15/2005	<25.0	<25.0	<25.0	< 0.025	< 0.025	< 0.025	< 0.025	105
e 4/	15/2005	196	1,620	1,820	< 0.025	< 0.025	< 0.025	<0.025	84.9
	e 4/	e 4/15/2005	e 4/15/2005 <25.0	e 4/15/2005 <25.0 <25.0	e 4/15/2005 <25.0 <25.0 <25.0	e 4/15/2005 <25.0 <25.0 <25.0 <0.025	e 4/15/2005 <25.0 <25.0 <25.0 <0.025 <0.025	e 4/15/2005 <25.0 <25.0 <25.0 <0.025 <0.025 <0.025	e 4/15/2005 <25.0 <25.0 <25.0 <0.025 <0.025 <0.025 <0.025

 $(<\!\!25.0 \text{ and } <\!\!0.025)$  - Analyte not detected at or above the reporting limit (NA): Not Analyzed

# APPENDIX A



## **Analytical Report**

Prepared for: lke Tavarez

Highlander Environmental Corp. 1910 N. Big Spring St. Midland, TX 79705

Project: Pogo/ Kelly State Pit Project Number: 2159 Location: Lea County, NM

Lab Order Number: 5D15015

Report Date: 04/20/05

Highlander Environmental Corp.	Project: Pogo/ Kelly State Pit	Fax: (432) 682-3946
1910 N. Big Spring St.	Project Number: 2159	Reported:
Midland TX, 79705	Project Manager: Ike Tavarez	04/20/05 12:32

#### ANALYTICAL REPORT FOR SAMPLES

•

Sample 1D	Laboratory ID	Matrix	Date Sampled	Date Received
Composite #1 (8.0') Shelf	5D15015-01	Soil	04/14/05 12:00	04/15/05 16:50
Composite #2 (12.0') Bottom	5D15015-02	Soil	04/14/05 12:30	04/15/05 16:50
Composite #3 (7.0') Shelf	5D15015-03	Soil	04/15/05 13:00	04/15/05 16:50
Composite #4 (9.0') Shelf	5D15015-04	Soil	04/15/05 13:05	04/15/05 16:50
Composite #5 (9.0') Shelf	5D15015-05	Soil	04/15/05 13:10	04/15/05 16:50
Composite #6 Side Wall	5D15015-06	Soil	04/15/05 13:15	04/15/05 16:50
Composite #7 Side Wall	5D15015-07	Soil	04/15/05 13:20	04/15/05 16:50
Composite #8 Side Wall	5D15015-08	Soil	04/15/05 13:25	04/15/05 16:50
Composite #9 Side Wall	5D15015-09	Soil	04/15/05 13:30	04/15/05 16:50

Highlander Environmental Corp. 1910 N. Big Spring St. Midland TX, 79705

F

Project: Pogo/ Kelly State Pit Project Number: 2159 Project Manager: Ike Tavarez

**Reported:** 04/20/05 12:32

#### Organics by GC

#### **Environmental Lab of Texas**

		Reporting							
Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Composite #1 (8.0') Shelf (5D15015-01) S	Soil								
Benzene	ND	0.0250	mg/kg dry	25	ED51911	04/19/05	04/19/05	ÉPA 8021B	
Toluene	ND	0.0250							
Ethylbenzene	ND	0.0250			*		п		
Xylene (p/m)	ND	0.0250			٣			•	
Xylene (o)	ND	0.0250						v	
Surrogate: a.a.a-Trifluorotoluene		114%		120	"	, , , , , , , , , , , , , , , , , , , ,	<i>"</i>		
Surrogate: 4-Bromofluorobenzene		105 %	80-	120	"	"	"	"	
Gasoline Range Organics C6-C12	NĎ	10.0	mg/kg dry	ł	ED51904	04/18/05	04/18/05	EPA 8015M	
Diesel Range Organics >C12-C35	188	10.0	•			-	**	•	
Total Hydrocarbon C6-C35	188	10.0				"		-	
Surrogate: 1-Chlorooctane		90.8 %	70-	130	"	<i>"</i>	<i>"</i>	"	
Surrogate: 1-Chlorooctadecane		93.2 %	70-	130	"		91	"	
Composite #2 (12.0') Bottom (5D15015-0	02) Soil								
Benzene	ND	0.0250	mg/kg dry	25	ED51911	04/19/05	04/19/05	EPA 8021B	
Toluene	ND	0.0250	**		-	*		•	
Ethylbenzene	ND	0.0250	**				•	D	
Xylene (p/m)	ND	0.0250				"	**		
Xylene (o)	ND	0.0250							
Surrogate: a,a,a-Trifluorotoluene		105 %	80-	120	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		86.4 %	80-	120	"	<i>p</i>	"		
Gasoline Range Organics C6-C12	17.9	10.0	mg/kg dry	1	ED51904	04/18/05	04/18/05	EPA 8015M	
Diesel Range Organics >C12-C35	149	10.0		-		"			
Total Hydrocarbon C6-C35	167	10.0			"		•"	•	
Surrogate: 1-Chlorooctane		81.4%	70-	130	"	"	"	"	
Surrogate: 1-Chlorooctadecane		81.8 %	70-	130	"	.,	и	μ	
Composite #3 (7.0') Shelf (5D15015-03) 5	Soil								
Benzene	ND	0.0250	mg/kg dry	25	ED51911	04/19/05	04/19/05	EPA 8021B	
Toluene	ND	0.0250	•				•	"	
Ethylbenzene	ND	0.0250				-		w	
Xylene (p/m)	ND	0.0250		н				-	
Xylene (o)	ND	0.0250		•1				"	
Surrogate: a,a,a-Trifluorotoluene		113 %	80-	120	,,	"	"		
Surrogate: 4-Bromofluorobenzene		90.6 %	80	120	"		"	"	
Gasoline Range Organics C6-C12	ND	10.0	mg/kg đry	1	ED51904	04/18/05	04/18/05	EPA 8015M	
Diesel Range Organics >C12-C35	29.9	10.0	"				•		
Total Hydrocarbon C6-C35	29.9	10.0			•	•			

Environmental Lab of Texas

The results in this report apply to the samples analyzed in accordance with the samples received in the laboratory. This analytical report must be reproduced in its entirety, with written approval of Environmental Lab of Texas.

Highlander Environmental Corp.			Project: Pog		ate Pit			Fax: (43	2) 682-3946
1910 N. Big Spring St. Midland TX, 79705			umber: 215 anager: Ike						ported: /05 12:32
					· · · · · ·				
			rganics b						
	·	Environ	mental L	ab of Te	exas				
Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Composite #3 (7.0') Shelf (5D15015-03	3) Soil								
Surrogate: 1-Chlorooctane		86.6 %	7 <b>0-1</b>	30	ED51904	04 18 05	04 18 05	EPA 8015M	
Surrogate: 1-Chlorooctadecane		88.6 %	70-1	30	"	"	"		
Composite #4-(9.0') Shelf (5D15015-0-	I) Soil								
Benzene	ND	0.0250	mg/kg dry	25	ED51911	04/19/05	04/19/05	EPA 8021B	
Toluene	J [0.0165]	0.0250	•		•	•	"	*	
Ethylbenzene	0.0808	0.0250			'n	*	-		
Xylene (p/m)	0.379	0.0250	**	ч	•	•	"		
Xylene (0)	0.0949	0.0250	*		-		-	"	
Surrogate: a,a,a-Trifluorotoluene		117 %	80-1	20	"	"	"		
Surrogate: 4-Bromofluorobenzene		104 %	80-1	20	"	"		"	
Gasoline Range Organics C6-C12	241	10.0	mg/kg dry	1	ED51904	04/18/05	04/19/05	EPA 8015M	
Diesel Range Organics >C12-C35	1400	10.0	**		•				
Total Hydrocarbon C6-C35	1640	10.0	**			*		*	
Surrogate: 1-Chlorooctane		96.8 %	70-1	30		"	"		
Surrogate: 1-Chlorooctadecane		97.2 %	70-1	30	"	"	*	"	
Composite #5 (9.0') Shelf (5D15015-0	5) Soil								
Benzene	ND	0.0250	mg/kg dry	25	ED51911	04/19/05	04/19/05	EPA 8021B	
Toluene	0.0435	0.0250			•	•		••	
Ethylbenzene	0.160	0.0250		-			-		
Xylene (p/m)	0.721	0.0250	*		•				
Xylene (o)	0.166	0.0250	"		•	•	•	н.	
Surrogate: a,a,a-Trifluorotoluene		117 %	80-1	20		"	"	"	
Surrogate: 4-Bromofluorobenzene		111 %	80-1	20			*	"	
Gasoline Range Organics C6-C12	782	10.0	mg/kg dry	1	ED51904	04/18/05	04/19/05	EPA 8015M	
Diesel Range Organics >C12-C35	3660	10.0	в	••	•	•			
Total Hydrocarbon C6-C35	4440	10.0		•		•	"	•	
Surrogate: 1-Chlorooctane		92.4 %	20-1	30		"		"	
Surrogate: 1-Chlorooctadecane		88.2 %	7 <b>0-1</b>	30	"	*		"	

Environmental Lab of Texas

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Highlander Environmental Corp. 1910 N. Big Spring St. Midland TX, 79705 Project: Pogo/ Kelly State Pit Project Number: 2159 Project Manager: Ike Tavarez

Reported: 04/20/05 12:32

#### Organics by GC

#### Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Composite #6 Side Wall (5D15015-06) Soi	1								
Benzene	ND	0.0250	mg/kg dry	25	ED51911	04/19/05	04/19/05	EP.A 8021B	
Toluene	ND	0.0250	•	•		**			
Ethylbenzene	ND	0.0250		**				v	
Xylene (p/m)	ND	0.0250				"	••		
Xylene (o)	ND	0.0250	•	-			"		
Surrogate: a,a,a-Trifluorotoluene		112 %	80-12	0	"	"	"		
Surrogate: 4-Bromofluorobenzene		105 %	80-12	20	"	"	"		
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	I	ED51904	04/18/05	04/19/05	EPA 8015M	
Diesel Range Organics >C12-C35	99.9	10.0		"				-	
Total Hydrocarbon C6-C35	99.9	10.0	"	•			*	••	
Surrogate: 1-Chlorooctane		91.4%	70-13	80	"	"		···· · · · · · · · · · · · · · · · · ·	
Surrogate. 1-Chlorooctadecane		92.4 %	70-13	80	**	"	"	"	
Composite #7 Side Wall (5D15015-07) So	i)								
Benzene	ND	0.0250	mg/kg dry	25	ED51911	04/19/05	04/19/05	EPA 8021B	
Toluene	ND	0.0250		-		٣	••		
Ethylbenzene	ND	0.0250		n			•	r	
Xylene (p/m)	ND	0.0250					"		
Xylene (o)	ND	0.0250		"	•	"			
Surrogate: a,a,a-Trifluorotoluene		110 %	80-12	20	"	"		"	
Surrogate: 4-Bromofluorobenzene		94.5 %	80-12	20	**	"	"	"	
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	}	ED51905	04/18/05	04/19/05	EPA 8015M	
Diesel Range Organics >C12-C35	310	10.0		n			•	•	
Total Hydrocarbon C6-C35	310	10.0						•	
Surrogate: 1-Chlorooctane		85.8%	70-13	30	"	"	"		
Surrogate: 1-Chlorooctadecane		89.8 %	70-13	80	"	"	"		
Composite #8 Side Wall (5D15015-08) So	i}								
Benzene	ND	0.0250	mg/kg dry	25	ED51911	04/19/05	04/19/05	EPA 8021B	
Toluene	ND	0.0250		"				•	
Ethylbenzene	ND	0.0250		*		•			
Xylene (p/m)	ND	0.0250	**	"	"		"	0	
Xylene (0)	ND	0.0250		-	•	*			
Surrogate: a.a.a-Trifluorotoluene		112 %	80-12	20	"	"	"		
Surrogate: 4-Bromofluorobenzene		95.0 %	80-12	20	"	"	"	"	
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	ED51905	04/18/05	04/19/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	к	"			•	••	
Total Hydrocarbon C6-C35	ND	10.0		••	-			•	

Environmental Lab of Texas

The results in this report apply to the samples analyzed in accordance with the samples received in the laboratory. This analytical report must be reproduced in us entirety, with written approval of Environmental Lab of Texas.

Highlander Environmental Corp.		F	Project: Po	go/ Kelly St	ate Pit	Fax: (432) 682-3946					
1910 N. Big Spring St.		Project N	umber: 21	59				Re	ported:		
Midland TX. 79705	Project Manager: Ike Tavarez							04/20/05 12:32			
		Or	ganics t	oy GC							
		Environ	nental L	ab of Te	exas						
Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes		
Composite #8 Side Wall (5D15015-08) Soil											
Surrogate: 1-Chlorooctane		81.2 %	70-	130	ED51905	04 18 05	114 19 115	EP.4 8015M			
Surrogate. 1-Chlorooctadecane		83.2 %	70-	130	"			"			
Composite #9 Side Wall (5D15015-09) Soil											
Benzene	ND	0.0250	mg/kg dry	25	ED51911	04/19/05	04/19/05	EPA 8021B			
Toluene	ND	0.0250		•			"				
Ethylbenzene	ND	0.0250	"	•							
Xylene (p/m)	ND	0.0250	•		**	-	"	•			
Xylene (o)	ND	0.0250	•	•	•	-	•				
Surrogate: a,a,a-Trifluorotoluene		118 %	80-	120	"	"	"	···· · ···-·			
Surrogate: 4-Bromofluorobenzene		84.9 %	80-	120	"	"	"				
Gasoline Range Organics C6-C12	196	10.0	mg/kg dry	1	ED51905	04/18/05	04/19/05	EPA 8015M			
Diesel Range Organics >C12-C35	1620	10.0			••			•			
Total Hydrocarbon C6-C35	1820	10.0	٠	-			-	•			
Surrogate: 1-Chlorooctane		87.6 %	70-	130		"		,,			
Surrogate: 1-Chlorooctadecane		96. <i>4 %</i>	70-	130	"	"		"			

Environmental Lab of Texas

Highlander Environmental Corp. 1910 N. Big Spring St. Midland TX, 79705

#### Project: Pogo/ Kelly State Pit Project Number: 2159 Project Manager: Ike Tavarez

Fax: (432) 682-3946

Reported:

04/20/05 12:32

#### General Chemistry Parameters by EPA / Standard Methods

#### **Environmental Lab of Texas**

		Reporting							
Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Note
Composite #1 (8.0') Shelf (5D15015-01) Soi									
Chloride	716	50.0	mg/kg	100	ED52011	04/18/05	04/18/05	EPA 300.0	
% Moisture	11.0	0.1	0	1	ED51907	04/18/05	04/19/05	% calculation	
Composite #2 (12.0') Bottom (5D15015-02)	Soil								
Chloride	373	20.0	mg/kg	40	ED52011	04/18/05	04/18/05	EPA 300.0	
% Moisture	8.9	0.1	%	1	ED51907	04/18/05	04/19/05	% calculation	
Composite #3 (7.0') Shelf (5D15015-03) Soi	I								
Chloride	199	10.0	mg/kg	20	ED52011	04/18/05	04/18/05	EPA 300.0	
% Moisture	10.3	0.1	9%	1	ED51907	04/18/05	04/19/05	% calculation	
Composite #4 (9.0') Shelf (5D15015-04) Soi	I								
Chloride	274	10.0	mg/kg	20	ED52011	04/18/05	04/18/05	EPA 300.0	
% Moisture	9.6	0.1	0.0	ł	ED51907	04/18/05	04/19/05	% calculation	
Composite #5 (9.0') Shelf (5D15015-05) Soi	l								
Chloride	375	10.0	mg/kg	20	ED52011	04/18/05	04/18/05	EPA 300.0	
% Moisture	7.4	0.1	%	1	ED51907	04/18/05	04/19/05	% calculation	
Composite #6 Side Wall (5D15015-06) Soil									
Chloride	90.7	10.0	mg/kg	20	ED52013	04/19/05	04/19/05	EPA 300.0	
% Moisture	7.8	0.1	%	I	ED51907	04/18/05	04/19/05	% calculation	
Composite #7 Side Wall (5D15015-07) Soil									
Chloride	49.5	5 00	mg/kg	10	ED52013	04/19/05	04/19/05	EPA 300.0	
% Moisture	8.9	0.1	0,0	3	ED51907	04/18/05	04/19/05	% calculation	
Composite #8 Side Wall (5D15015-08) Soil									
Chloride	105	5.00	mg/kg	10	ED52013	04/19/05	04/19/05	EPA 300.0	
% Moisture	5.7	0.1	%	1	ED51907	04/18/05	04/19/05	% calculation	

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#### Project: Pogo/ Kelly State Pit Project Number: 2159 Project Manager: Ike Tavarez

#### Fax: (432) 682-3946

.

Reported:

04/20/05 12:32

#### General Chemistry Parameters by EPA / Standard Methods

#### **Environmental Lab of Texas**

Analyte Composite #9 Side Wall (5D15015-09) Soil	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Chloride	84.9	5.00	mg/kg	10	ED52013	04/19/05	04/19/05	EPA 300.0	
% Moisture	5.3	0.1	°, 20	I	ED51907	04/18/05	04/19/05	% calculation	

Environmental Lab of Texas

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Highlander Environmental Corp. 1910 N. Big Spring St. Midland TX, 79705		Project: Pogo/ Kelly State Pit Project Number: 2159 Project Manager: Ike Tavarez								682-3946 rted: 5 12:32
		- rojeci Ma	mager. ike						04/20/0	
	0	rganics by	<b>GC - Q</b>	uality Co	ontrol					
		Environ	nental L	ab of Te	kas					
Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch ED51904 - Solvent Extraction (GC	.)			-						
Blank (ED51904-BLK1)				Prepared &	Analyzed:	04/18/05				
Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet					*		
Diesel Range Organics >C12-C35	ND	10.0	•							
Total Hydrocarbon C6-C35	ND	10.0								
Surrogate: 1-Chloroociane	37.8		mg kg	50.0		-5.6	70-130			
Surrogate: 1-Chloroociadecane	36.0		"	50.0		72.0	70-130			
LCS (ED51904-BS1)				Prepared &	Analyzed	04/18/05				
Gasoline Range Organics C6-C12	431	10.0	mg/kg wet	500		86.2	75-125			•
Diesel Range Organics >C12-C35	537	10.0		500		107	75-125			
Total Hydrocarbon C6-C35	968	10.0		1000		96.8	75-125			
Surrogate: 1-Chlorooctane	46. J		mg kg	50.0		92.2	70-130			• • • •
Surrogate 1-Chloroociadecane	40, 1		"	50.0		81.4	-0-130			
Calibration Check (ED51904-CCV1)				Prepared &	Analyzed	04/18/05				
Gasoline Range Organics C6-C12	430		mg/kg	500		86.0	80-120			
Diesel Range Organics >C12-C35	547			500		109	80-120			
Total Hydrocarbon C6-C35	977			1000		97.7	80-120			
Surrogate: 1-Chlorooctane	55.8		"	50.0		112	70-130			
Surrogate: 1-Chlorooctadecane	64		"	50.0		129	70-130			
Matrix Spike (ED51904-MS1)	Sou	rce: 5D15005	5-03	Prepared 8	e Analyzed	: 04/18/05				
Gasoline Range Organics C6-C12	511	10.0	mg/kg dry	543	ND	94.1	75-125			
Diesel Range Organics >C12-C35	520	10.0		543	23.1	91.5	75-125			
Total Hydrocarbon C6-C35	1030	10.0		1090	23.1	92.4	75-125			
Surrogate: 1-Chlorooctane	47.5		mg kg	50.0		95.0	<i>0-130</i>			
Surrogate: 1-Chloroociadevane	42.7		"	50.0		85.4	<i>:</i> 0-130			
Matrix Spike Dup (ED51904-MSD1)	Sou	rce: 5D15005	5-03	Prepared &	k Analyzed	: 04/18/05				
Gasoline Range Organics C6-C12	476	10.0	mg/kg dry	543	ND	87.7	75-125	7.09	20	
Diesel Range Organics >C12-C35	569	10.0		543	23.1	101	75-125	9.00	20	
Total Hydrocarbon C6-C35	1040	10.0		1090	23,1	93.3	75-125	0.966	20	
Surrogate: 1-Chloroociane	49.0		mg kg	50.0		98,0	-0-130			• • • •
Surrogate: 1-Chlorooctadecane	43.8		"	50.0		87.6	20-130			

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Highlander Environmental Corp.		F	Project: Pog	o/ Kelly Sta	te Pit				Fax: (432	?) 682-3946				
1910 N. Big Spring St.			umber: 215						Reported:					
Midland TX, 79705		Project Ma	mager: Ike	Tavarez				04/20/05 12:32						
	Or	ganics by	/ GC - Q	uality Co	ontrol									
		Environ	nental L	ab of Te	xas									
Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes				
Batch ED51905 - Solvent Extraction (GC	C)													
Blank (ED51905-BLK1)				Prepared &	: Analyzed	: 04/18/05								
Gasoline Range Organics C6-C12	ND	10.0	ing/kg wet			•								
Diesel Range Organics >C12-C35	ND	10.0												
Total Hydrocarbon C6-C35	ND	10.0	•											
Surrogate: 1-Chlorooctane	37.7		mg kg	50.0		-5.4	-0-130							
Surrogate: 1-Chlorooctadecane	36.8		"	50.0		73.6	~0- <i>130</i>							
LCS (ED51905-BS1)				Prepared &	Analyzed	: 04/18/05								
Gasoline Range Organics C6-C12	381	0.01	mg/kg wet	500		76.2	75-125			• • • •				
Diesel Range Organics >C12-C35	462	10.0		500		92.4	75-125							
Total Hydrocarbon C6-C35	843	10.0	٠	1000		84.3	75-125							
Surrogate: 1-Chlorooctane	41.3		mg kg	50.0		×2.6	70-130							
Surrogate: 1-Chlorooctadecane	36.0			50.0		72.0	-0-130							
Calibration Check (ED51905-CCV1)				Prepared &	: Analyzed	: 04/18/05								
Gasoline Range Organics C6-C12	457		mg/kg	500		91.4	80-120							
Diesel Range Organics >C12-C35	446			500		89.2	80-120							
Total Hydrocarbon C6-C35	903		•1	1000		90.3	80-120							
Surrogate: 1-Chloroociane	62.8	•• •• •• •• •• ••	"	50.0		126	70-130							
Surrogate: 1-Chlorooctadecane	64.6		"	50.0		129	70-130							
Matrix Spike (ED51905-MS1)	Sour	ce: 5D1501	5-08	Prepared: (	04/18/05 A	nalyzed: 0	4/19/05							
Gasoline Range Organics C6-C12	531	10.0	mg/kg dry	530	ND	100	75-125							
Diesel Range Organics >C12-C35	579	10.0		530	ND	109	75-125							
Total Hydrocarbon C6-C35	1110	10.0	-	1060	ND	105	75-125							
Surrogate: 1-Chloroociane	53.0		mg kg	50.0	• •	106	~0-130							
Surrogate: 1-Chlorooctadecane	44.9		"	50.0		89.8	<i>~0-130</i>							
Matrix Spike Dup (ED51905-MSD1)	Sour	ce: 5D15015	5-08	Prepared: (	04/18/05 A	natyzed: 04	4/19/05							
Gasoline Range Organics C6-C12	511	10.0	mg kg dry	530	ND	96.4	75-125	3 84	20					
Diesel Range Organics >C12-C35	541	10.0	"	530	ND	102	75-125	6.79	20					
Total Hydrocarbon C6-C35	1050	10.0	,.	1060	ND	99.1	75-125	5.56	20					
Surrogate: 1-Chlorooctane	53.6		mg kg	50.0		107	70-130							
Surrogate: 1-Chlorooctadecane	45.4		"	50.0		90.8	<i><b>70-130</b></i>							

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nightander Environmentar Corp.		,	T TOEO Keny St						
1910 N. Big Spring St.		Project Numbe						•	orted:
Midland TX. 79705		Project Manage	r: Ike Tavarez	····				04/20/	05 12:32
	Or	ganics by GO	C - Quality C	ontrol					
		Environmen	tal Lab of Te	exas					
		Reporting	Spike	Source	A:250	%REC		RPD	
Analyte	Result	Limit U	nits Level	Result	%REC	Limits	RPD	Limit	Notes
Batch ED51911 - EPA 5030C (GC)	·····								
Blank (ED51911-BLK1)			Prepared	& Analyzed	04/19/05				
Веплене	ND	0.0250 mg/	kg wet						
Toluene	ND	0.0250	-						
Ethylbenzene	ND	0.0250							
Xylene (p/m)	ND	0.0250							
Xylene (0)	ND	0.0250							
Surrogate: a, a, a-Trifluorotoluene	110		g kg 100		110	80-120			
Surrogate: 4-Bromofluorobenzene	111		" 100		111	80-120			
LCS (ED51911-BS1)			Prepared	& Analyzed	: 04/19/05				
Benzene	101	บ	g/kg 100		101	80-120			
Toluene	106		" 100		106	80-120			
Ethylbenzene	110		" 100		110	80-120			
Xylene (p/m)	239		" 200		120	80-120			
Xylene (0)	116		" 100		116	80-120			
Surrogate: a.a.a-Trifluorotoluene	112		" 100	• • • •	112	80-120			
Surrogate: 4-Bromofluorobenzene	116		" 100		116	80-120			
Calibration Check (ED51911-CCV1)			Prepared	04/19/05 A	nalyzed: 04	4/20/05			
Benzene	99.5	U	g/kg 100		99.5	80-120			
Toluene	101		" 100		101	80-120			
Ethylbenzene	94.1				94.1	80-120			
Xylene (p/m)	209		" 200		104	80-120			
Xylene (0)	102		" 100		102	80-120			
Surrogate: a,a,a-Trifluorotoluene	116				116	80-120	· ·		
Surrogate: 4-Bromofluorobenzene	99. Ť		" 100		99. î	×0-120			
Matrix Spike (ED51911-MS1)	Sour	ce: 5D19001-04	Prepared	& Analyzed	: 04/19/05				
Benzene	95.0	u	 g/kg 100	ND	95.0	80-120			
Toluene	96.2			ND	96.2	80-120			
Ethylbenzene	94.2		" 100	ND	94.2	80-120			
Xylene (p/m)	210		" 200	ND	105	80-120			
Xylene (0)	99.9		<b>.</b> 100	ND	99.9	80-120			
Surrogate: a.a.o-Trifluorotoluene	110		100		110	80-120		• • • • • •	

Project: Pogo/ Kelly State Pit

Surrogate: 4-Bromofluorobenzene

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Fax: (432) 682-3946 Reported:

Highlander Environmental Corp. 1910 N. Big Spring St.

Highlander Environmental Corp.	Project: Pogo/ Kelly State Pit	Fax: (432) 682-3946
1910 N. Big Spring St.	Project Number: 2159	Reported:
Midland TX, 79705	Project Manager: Ike Tavarez	04/20/05 12:32

#### Organics by GC - Quality Control

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#### Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch ED51911 - EPA 5030C (GC)										
Matrix Spike Dup (ED51911-MSD1)	Sour	ce: 5D19001-0-	1	Prepared &	Analyzed:	04/19/05				
Benzene	104		ug/kg	100	ND	104	80-120	9.05	20	
Toluene	110		•	100	ND	110	80-120	13-4	20	
Ethylbenzene	110		•	100	NÐ	110	80-120	15.5	20	
Xylene (p/m)	238			200	ND	119	80-120	12.5	20	
Xylene (0)	116			100	ND	116	80-120	14.9	20	
Surrogate: a.a.a-Trifluorotoluene			"	100		117	80-120			
Surrogate: 4-Bromofluorobenzene	113		"	100		113	80-120			

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Highlander Environmental Corp.		Pr	oject: Po	go/ Kelly Sta	te Pit				Fax: (432	) 682-3946
1910 N. Big Spring St		Project Nu							Red	orted:
Midland TX, 79705		Project Mar							•	05 12:32
General Ch	emistry Para	-				ls - Qua	lity Con	trol		
		Environm	iental l	Lab of Tex	xas					
Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch ED51907 - General Preparation (P	rep)									
Blank (ED51907-BLK1)				Prepared: (	04/18/05 A	nalyzed: 04	/19/05			
6 Moisture	ND	0,1	0.0	-	· ·					
Duplicate (ED51907-DUP1)	Sou	rce: 5D15005-	-01	Prepared: (	04/18/05 A	nalyzed: 04	/19/05			
% Moisture	10.7	0.1	0 /0		10.2			4.78	20	
Batch ED52011 - Water Extraction										
Blank (ED52011-BLK1)		·		Prepared &	Analyzed:	04/18/05	-			
hloride	ND	0.500	mg/kg							
LCS (ED52011-BS1)				Prepared &	Analyzed:	04/18/05				
Thloride	10.7		mg/L	10.0		107	80-120			
Calibration Check (ED52011-CCV1)				Prepared &	Analyzed.	04/18/05				
Chloride	10.9		mg/L	10.0		109	80-120			
Duplicate (ED52011-DUP1)	Sou	rce: 5D14016-	-05	Prepared &	analyzed:	04/18/05				
Thloride	30.8	5.00	mg/kg		35.9			15.3	20	
Batch ED52013 - Water Extraction										
Blank (ED52013-BLK1)				Prepared 8	c Analyzed:	04/19/05				
Thloride	ND	0.500	mg/kg							
LCS (ED52013-BS1)				Prepared 8	2 Analyzed:	04/19/05				
Thloride	10.8		mg/L	10.0		108	80-120			

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Highlander Environmental Corp.	Project:	Pogo/ Kelly State Pit	Fax: (432) 682-3946
1910 N. Big Spring St.	Project Number:	2159	Reported:
Midland TX. 79705	Project Manager:	Ike Tavarez	04/20/05 12:32

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#### General Chemistry Parameters by EPA / Standard Methods - Quality Control

#### **Environmental Lab of Texas**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch ED52013 - Water Extraction										
Calibration Check (ED52013-CCV1)					Analyzed:	04/19/05				
Chloride	10.9		mg/L	10.0		109	80-120			
Duplicate (ED52013-DL <sup>1</sup> P1)	Sour	Source: 5D15015-06 Prepared & Analyzed: 04/19/05								
Chloride	91.7	10.0	mg/kg		90.7			1.10	20	

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Highlander Environmental Corp.		Project: Pogo/ Kelly State Pit	Fax: (432) 682-3946
1910 N.	Big Spring St.	Project Number: 2159	Reported:
Midland	TX. 79705	Project Manager: Ike Tavarez	04/20/05 12:32
		Notes and Definitions	
J	Detected but below the Reporting Lir	nit; therefore, result is an estimated concentration (CLP J-Flag).	
DET	Analyte DETECTED		
ND	Analyte NOT DETECTED at or above the	e reporting limit	

- NR Not Reported
- dry Sample results reported on a dry weight basis
- RPD Relative Percent Difference
- LCS Laboratory Control Spike
- MS Matrix Spike
- Dup Duplicate

Report Approved By:

Raland K Julies 4/20/2005 Date:

Raland K. Tuttle, Lab Manager Celey D. Keene, Lab Director, Org. Tech Director Peggy Allen, QA Officer Jeanne Mc Murrey. Inorg. Tech Director James L. Hawkins, Chemist/Geologist Sandra Sanchez, Lab Tech.

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(43)	2) 682-	4559							Fax (	43	2)	68	2-3	946	<u>,</u>			2		5 8				- 18								
CLIENT N	AMCE:	060			SITE M	inage	R: Ike	Ta14/1	Z	SHEW		PI		RVA THO	tive D			BUTS MOD				5		1380/626 8270/626			C. Liony					
PROJECT	<sup>NO.:</sup> 2	159	PRC PC	uec >GC	Kelly St	ate	pit			CONTAINERS	(11/11)					608	1005			a Ag Ag	168	Send Valetilan		0540/1 Vol		666	158, pH, TD8,	04. (4b-)				
LAB I.D. NUMBER	DATE	TTME	MATRIX COMP.		Lea	1041	NTIFICATIO	,	1	NUMBER OF	RED	NCL	EN03	жж	NONS	TEL 8030/803	WTER BORD/002	THE A	PAH SUPO	TCLP Metals As	TCLP Volatiles	e.	RCI	GC.MS Vol. 82	FCB's 8080/408	Past. 808/808	NOD. 158.	Gamma Spen. Ainta Bata (i	PLM (Ashestes)			
·····	4/14/05	12:00	5 X		Composite	# [	(8.0'	shelf						X		X		X									X					
-62	4/14/05	12:30	5 X		Composite					1				X		X		X									X					
703	4/15/05	1:00	5 X		composite	Ħ.	3 (7.0'	) shelf		1				X		X		X									X					
-04	4/15/05	1:05	5 X		(omposite	HL	119.0'	) shelt		1				X		X		X									X					
-05	H/15705	1:10	5 X		(onposite	45	[9.0]	shelf		1				X		X		Y									X					
-06	4115705	1:15	5 X		(on posife					1				X		X		X									X				-	
-07	4/15/05	1:20	SX		(omposite									X		X		X									X					
-08	4/15705	1:25	5 X		(onposite									χ		X		X									X					
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Flease Fill sut all copies - Laboratory retains yellow copy - Return original copy to Nighlander Environmental Corp. - Project Manager retains pink copy - Accounting receives Gold copy.

#### Environmental Lab of Texas Variance / Corrective Action Report – Sample Log-In

Client:	High	ander	Env	
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Date/Time: 04-15-05 @ 1650

Order #: 5 D 15015

Initials: JMM

#### Sample Receipt Checklist

Temperature of container/cooler?	VED NO	14.0 C
Shipping container/ccoler in good condition?	Yes No	
Custody Seals intact on shipping container/ccoler?	(Yes) No	Not present
Custody Seals intact on sample bottles?	VEE NO	Not present
Chain of custody present?	(Yes) No	
Sample Instructions complete on Chain of Custody?	NED NO	1
Chain of Custody signed when relinquished and received?	(YES) NO	
Chain of custody agrees with sample label(s)	( YES) NO	
Container labels legible and intact?	(ES) NO	
Sample Matrix and properties same as on chain of custody?	(PS) No	
Samples in proper container/bottle?	(as) No	
Samples properly preserved?	i (res)   No	1
Sample bottles intact?	NED NO	
Preservations documented on Chain of Custody?	(Pes No	
Containers documented on Chain of Custody?	(TES) NO	1
Sufficient sample amount for indicated test?	I ESI No	
All samples received within sufficient hold time?	I Yes No	,
VOC samples have zero headspace?	(es) No	Not Applicable

Other observations:

#### Variance Documentation:

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Contact Person:	Date/Time:	Contacted by:	
Regarding:			

Corrective Action Taken: