# ENVIROMENTAL SITE ASSESSMENT WORKPLAN



NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT DIL: CONSERVATION DIVISION DISTRICT I HOBBS 1625 N. French Dr., Hobbs, NM 88240 (505) 393-8161 FAX (505) 393-0720

Jennifer A. Salisbury CABINET SECRETARY

June 30, 1999

Mr. Rick Massey Chevron USA P.O. Box 1949 Eunice, NM 88231

## RECEIVED

JUL 0 9 1999

ENVIRONMENTAL BUREAU OIL CONSERVATION DIVISION

Re: Culp B Battery - UL I, Sec 31, Ts19s, R37E

Dear Mr. Massey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Chevron USA's (CUSA) Work Plan dated May 27, 1999 for the above referenced site submitted by Safety & Environmental Solutions, Inc. The plan is hereby approved and subject to the following conditions:

- 1. CUSA will notify the NMOCD at least 48 hours in advance of the scheduled activities such that the NMOCD has the opportunity to witness the events and split samples.
- 2. All waste disposed of off-site must receive NMOCD approval prior to disposal.
- 3. CUSA will provide the NMOCD with a final report containing the results of the remedial actions. The report will be submitted to the NMOCD Hobbs District Office by November 1, 1999 with a copy provided to the NMOCD Santa Fe Office.
- 4. Pursuant to NMOCD Rule 116 CUSA shall notify both the Division's District Office and the Division's Environmental Bureau Chief upon discovery of groundwater contamination.

Please be advised that NMOCD approval of this plan does not relieve CUSA of liability should their operations fail to adequately investigate and remediate contamination that poses a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve CUSA of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you require any further information or assistance please do not hesitate to call (505) 393-6161 ext...113 or write this office.

Sincerely Yours,

ana Williams

Donna Williams-Environmental Engineer

Cc: Chris Williams-NMOCD District I Supervisor Bill Olson-Environmental Bureau, Santa Fe, NM



## NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury CABINET SECRETARY





# Memo

**To:** <u>Bill Olson</u>

From: Donna williams

CC:

Date: 06/09/99

Re: C-138's

Bill,

Hi, how are things? Fine I hope. Enclosed is a copy of the Culp B Battery Work Plan. My concerns are, (endulge me ok)(let me know if I am in left field or ok), depth to ground water is only 22-27 feet. And they found contamination as far down as 16 feet, now with grd water being only 22 feet this bothers me. I feel that they should test for groundwater contamination, i.e. ground water integrity...can we make them, should we ask them to either drill a monitor well and test the water? Or can we even, is it reasonable to, have them to go down gradient and test the closet water well from the location? And why not? What is the protocol? I don't have a problem asking for a monitor well, but I don't know if it is the thing to do? Another concern is that the battery had been in use for a long time? They claim knowledge of process....my question is has the oil that has been produced at this battery always came from the same area/pool/company??? Do you understand what I'm trying to ask??? You see if they claim knowledge of process on a spill that would be ok if the soil contaminated came from the same oil tested every time. I guess what I am saying is that the old contamination may have been mixed with any other companies/oil etc....would this matter? It would seem to me it would, maybe having the possiblity to have mixed product, then it would have a different chemical makeup? Am I making myself clear? I feel I am having a bit of trouble trying to put my thoughts down. Call me and we will bounce this around if you don't mind. Thanks a lot.

Donna Williams

### Work Plan Culp B Battery Site Chevron USA

#### Purpose

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The purpose of this work plan is to cause the closure of the abandoned tank battery site located in Unit I of Section 31, Township 19 S, Range 37 E, Lea County, New Mexico. This plan will allow closure in a manner that will protect the population, environment and groundwater of the area surrounding the subject location.

#### Background

In April 1999, Chevron USA secured the services of Safety and Environmental Solutions, Inc. to complete all necessary sampling and testing of the area known as the Culp B Battery site. This site is in very close proximity to a residential dwelling and the ground water in this area is approximately 22' to 27'.

Ten (10) test borings were drilled at various locations in the area. The analytical results have been previously reported to the New Mexico Oil Conservation Division in the report dated April 30, 1999, *Chevron USA Site Assessment, Culp B Battery Site.* The results of this assessment revealed the vertical extent of contaminated soils from 5' to 16' at various locations at the subject site.

Knowledge of process indicates that the material in this area would be exempt oil field waste.

#### Method

Chevron USA has determined the most appropriate course of action is to depart from normal policy and excavate and dispose of all contaminated soils at the Oil Conservation Division permitted facility owned by Sundance Services. This decision has been reached after careful consideration of the close proximity of this site to a residential dwelling, the shallow depth to ground water and the number of pipelines close to and bisecting the subject site.

Chevron USA proposes to remove the source of contamination, soil in excess of 100 ppm TPH from the subject site and transport the excavated material to the Sundance Services disposal facility. The excavation will be back filled with clean soil (under 100 ppm) and restored back to the original grade.

#### Source Removal

This excavation will remove approximately 5000 cubic yards of source contamination from the area.

Additional testing (TPH and BTEX) will be performed on the bottom and sides of the spill area after excavation in order to document that all of the contaminated soils have been removed from the site.

## Chevron USA Site Assessment Culp B Battery Site

## Section 31 Township 19 S Range 37 E Lea County, New Mexico

April 30, 1999

Safety & Environmental Solutions, Inc. 703 E. Clinton Suite 103 Hobbs, New Mexico 88240 (505) 397-0510

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#### I. Background

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Safety & Environmental Solutions, Inc. (SESI) was engaged on April 27, 1999 to perform a site assessment of the Chevron Culp B Tank Battery Site located in Unit I of Section 31 Township 19S, Range 37E, Lea County, New Mexico (Figure 1). The site consists of an approximately 25,867 square foot area enclosed with a barbed wire fence. This area was used as a site for the storage of fluids produced by wells of the Culp B lease by Chevron USA (Figure 2). In addition to the enclosed area, a vent line for the batteries ran east of the site approximately 60'. An area of mildly stained soils at this location was investigated. The bare area immediately south of the enclosed area was also investigated for possible contamination.

#### II. Work Performed

SESI performed the drilling and sampling services for this project. Cardinal Laboratories of Hobbs, New Mexico was contracted to perform the laboratory analytical testing required for this project. SESI used a hollow stem auger rig for the drilling and a thin wall sampling tube for the extraction of the samples. Ten (10) test borings were drilled throughout the subject site to depths that represent the vertical extent of contamination. The vertical extent of the contamination was considered to be 100 ppm TPH. The regulatory limits found in "Unlined Surface Impoundment Closure Guidelines" New Mexico Oil Conservation Division - February 1993 address Total Petroleum Hydrocarbons (TPH), Benzene, Ethyl Benzene, Toluene and Total Xylenes (BTEX).

SESI sampled the test borings at intervals of five (5) feet and performed field analytical tests to determine the extent of contamination of each sample. The field analytical tests performed were Total Petroleum Hydrocarbons (TPH) (EPA Method 418.1) using a General Analysis Corp. Mega TPH, Total Petroleum Hydrocarbon Analyzer Serial # 01196. Soil sampling was performed on soils from each test boring using SOPs found in **Environmental Protection Agency, 1984, Characterization of Hazardous Waste Site** - A Methods Manual: Vol II. The samples extracted from the bottom of each test boring were preserved on ice and delivered along with Chain of Custody to Cardinal Laboratories for testing. The samples were analyzed for Total Petroleum Hydrocarbons (EPA TRPHC SW-846 8015M) and BTEX (EPA Method SW-846-8260) and Chlorides (EPA Method 600/4-79-020 325.3). (Appendix A)

The test borings were plugged with cuttings. (Appendix B)

#### III. Vertical and Horizontal Extent Investigation

A summary of each test boring is presented in the following tables with the field analysis in black print and the laboratory analysis in blue print:

Site Assessment	Chevron USA
Culp B Battery Site	April 30, 1999

#### Test Boring #1

The first test boring was drilled on April 27, 1999 from 8:30 A.M. to 9:30 A.M. approximately 27.5 ' from the south fence and 33.5' from the east fence of the enclosed area. The boring was drilled to a depth of 10' and sampled at 5' to 10' depths.

ID/ Depth	TPH	Benzene	Toluene	Ethyl Benzene	Xylenes	Cl
1 5'	240					
2 10'	181	<0.002	<0.002	<0.002	<0.006	128

#### **Test Boring #2**

This test boring was drilled on April 27, 1999 from 10:00 A.M. to 11:30 A.M. approximately 23.3' from the north fence and 34.1' from the east fence of the enclosed area. This boring was drilled to a depth of 5' and sampled at 5'.

ED/ Depth	TPH	Benzene	Toluene	Ethyl Benzene	Xylenes	Cl
1 5'	146	0.003	0.003	0.003	0.008	112

#### Test Boring #3

This test boring was drilled on April 27, 1999 from 1:00 P.M. to 2:00 P.M. approximately 49' from the north fence and 118.7' from the east fence of the enclosed area. This boring was drilled to a depth of 5' and sampled at 5'.

́ID/ Depth	TERN STR	Benzene	Toluene	Ethyl Benzene	Xylenes -	े <sub>ह</sub> CL ्र. हे
1 5'	45.9	<0.002	<0.002	<0.002	<0.006	175

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#### Test Boring #4

This boring was drilled on April 27, 1999 from 2:15 P.M. to 3:30 P.M. approximately 49.7' from the north fence and 15.45' from the west fence of the enclosed area. This boring was drilled to a depth of 5' and a sample was taken at 5'.

ID/ Depth	TPH	Bénzene	Toluene	Ethył Benzene	Xylenes	Cl
1 5'	13.5_	<0.002	<0.002	<0.002	<0.006	96

#### Test Boring # 5

This boring was drilled on April 27, 1999 from 3:40 PM. to 4:15 PM. approximately 49.4' from the north fence and 56.65' from the west fence of the enclosed area. This boring was drilled to a depth of 5' and sampled from at 5'. This boring exhibited none of the soil characteristics or the previous borings and only sand was encountered. SESI determined that the site of this boring is in a buried pipeline right-of-way and it was decided not to proceed any deeper for fear of rupturing a pipeline. Sample not sent to laboratory.

ID/ Depth	TPH	Benzene	Toluene	Ethyl Benzene	Xylenes	Cl
1 5'	930					

#### **Test Boring #6**

This boring was drilled on April 28, 1999 from 9:05 A.M. to 10:15 AM. approximately 49.4' from the north fence and 50.15' from the west fence of the enclosed area. This boring was drilled to a depth of 10' and samples taken at 5' and 10'.

Depth	ТРН	Benzene	Toluene	Ethyl Benzene	Xylenes	Cl
1 5'	1434				×	
2 10'	<10	<0.002	<0.002	<0.002	<0.006	32

Site Assessment	Chevron USA
Culp B Battery Site	April 30, 1999

#### Test Boring #7

This boring was drilled on April 28, 1999 from 10:30 AM. To 2:15 PM. approximately 15.9' from the south fence and 36.5' form the west fence of the enclosed area. This boring was drilled to a depth of 15' and samples taken at 5', 10' and 15'. SESI was unable to extract enough material to send to laboratory.

ID/ Depth	ТРН	Benzene	Toluene	Ethyl Benzene	Xylenes	Cl
1 5'	1433					
2 10'	261					
3 15'	102					

#### **Test Boring #8**

This test boring was drilled on April 30, 1999 from 10:00 AM. to 12:00 PM. approximately 33.75' south of the south fence outside the enclosed area. This hole was drilled to a depth of 16' and sampled at 5', 10, & 16'. SESI was not able to extract enough material from the hard rock to send to the laboratory, however, a field sample was taken from the sample tube end.

	ТРН			Nylenes	CI
Depth			Benzene		
1					
5'	2223		<u> </u>		
2					
10'	452				
3					
16'	43				

#### Test Boring #9

This test boring was drilled on April 30, 1999 from 12:15 PM. to 1:45 PM. approximately 96.28" south of the south fence outside the enclosed area. This hole was drilled to a depth of 5' and sampled at 5'.

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ID/ <sup>****</sup> •** Depth =	ТРН	Benzene	Toluene	<sup>°</sup> Ethyl Benzene	Xylenes	Cl
1 5'	<10	<0.002	<0.002	<0.002	<0.006	48

#### Test Hole # 10

This test boring was drilled on April 28, 1999 from 2:30 PM. to 4:30 PM. and April 30, 1999 from 8:00 AM to 9:15 AM approximately 53.9' due east of the east fence outside the enclosed area. This boring was to investigate the vent line area. This boring was drilled to a depth of 5" and sample taken at 5'

™ ID/ ∵Depth	ТРН	Benzene	Toluene	Ethyl Benzene	Xylenes	CI
1 5'	<10	<0.002	<0.002	<0.002	<0.006	80

#### IV. Summary

This site assessment has revealed the vertical extent of contaminated soils ranges from 5' to 16' at the subject site. There was no indication that any contamination has migrated into the ground water in this area and no tests were conducted of the ground water.

#### V. Figures and Appendices

#### **Figures:**

Figure 1 - Vicinity Map Figure 2 - Site Plan

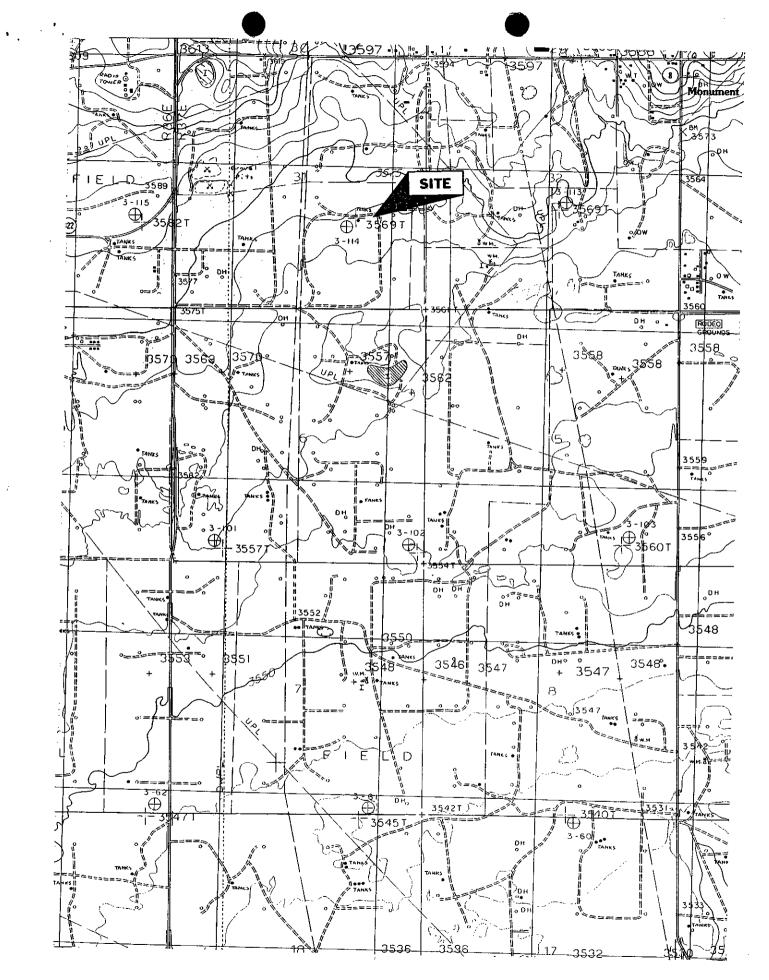
#### **Appendices:**

Appendix A - Analytical Results Appendix B - Logs of Boring Site Assessment Culp B Battery Site

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Chevron USA April 30, 1999

# Figure 1 Vicinity Map



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Site Assessment Culp B Battery Site

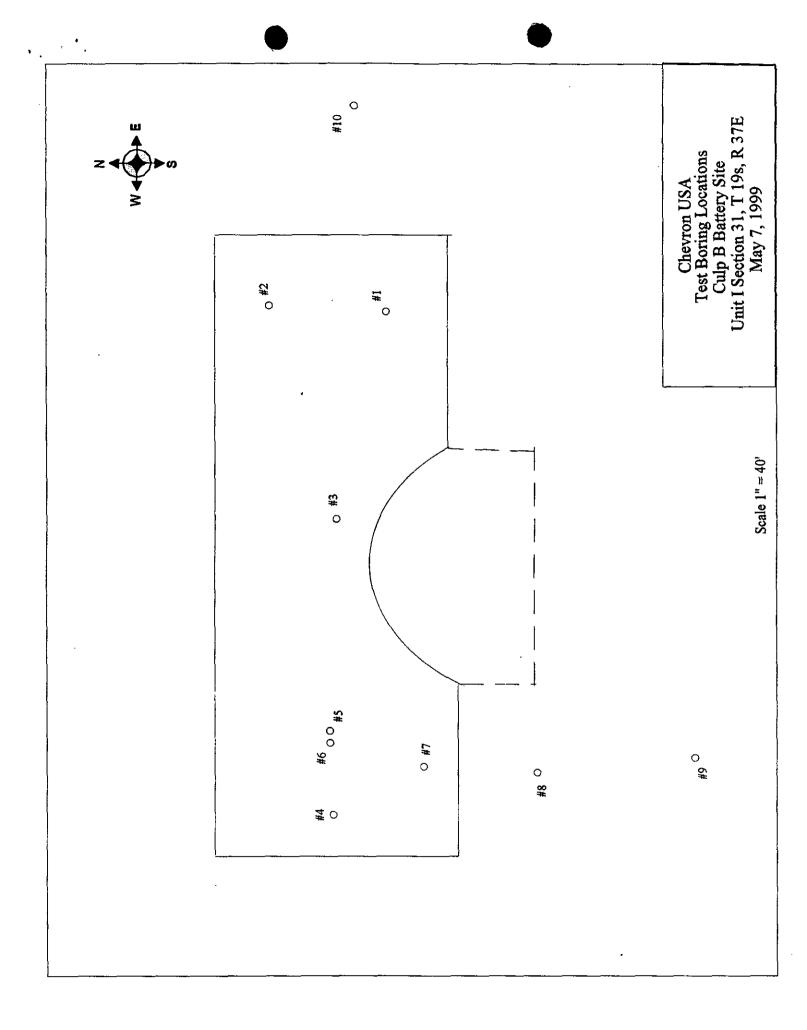
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Chevron USA April 30, 1999

## Figure 2 Site Plan

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Site Assessment Culp B Battery Site

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Chevron USA April 30, 1999

## Appendix A Analytical Results



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 . 101 E. MARLAND . HOBBS, NM 88240

ANALYTICAL RESULTS FOR SAFETY & ENVIRONMENTAL SOLUTIONS, INC. ATTN: BOB ALLEN 703 EAST CLINTON, SUITE 103 HOBBS, NM 88240 505-393-4388

Receiving Date: '05/04/99 Reporting Date: 05/05/99 Project Number: NOT GIVEN Project Name: CULP B Project Location: NOT GIVEN Analysis Date: 05/05/99 Sampling Date: 05/04/99 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: GP Analyzed By: GP

#### LAB NUMBER

R SAMPLE ID

CI (mg/L)

H4135-1	BH #1 Bottom	128
H4135-2	BH #2 Bottom	112
H4135-3	BH #3 Bottom	175
H4135-4	BH #4 Bottom	96
· · · · · · · · · · · · · · · · · · ·		
Quality Control	<u></u>	129
True Value QC		132
% Accuracy		98
<b>Relative</b> Perce	nt Difference	2.3
THOD: EPA 6		325.3

ayle AI Chemist

#### H4135B.XLS

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive ramedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries. affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



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PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR SAFETY & ENVIRONMENTAL SOLUTIONS, INC. ATTN: BOB ALLEN 703 E. CLINTON, SUITE 103 HOBBS, NM 88240 FAX TO:

Receiving Date: 05/04/99 Reporting Date: 05/05/99 Project Owner: NOT GIVEN Project Name: CULP B Project Location: NOT GIVEN Sampling Date: 05/04/99 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: GP Analyzed By: BC

LAB NO.	SAMPLE ID	TPH (mg/kg)	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL BENZENE (mg/kg)	TOTAL XYLENES (mg/kg)
ANALYSIS	DATE:	05/05/99	05/05/99	05/05/99	05/05/99	05/05/99
H4135-1	BH #1 BOTTOM	181	<0.002	< 0.002	< 0.002	<0.006
H4135-2	BH #2 BOTTOM	146	0.003	0.003	0.003	0.008
H4135-3	BH #3 BOTTOM	45,9	<0.002	< 0.002	<0.002	<0.006
H4135-4	BH #4 BOTTOM	13.5	<0.002	<0.002	<0.002	<0.006
	· · · · · · · · · · · · · · · · · · ·					
Quality Cor	ntrol	3070	0.093	0.100	0.100	0.307
True Value	QC	3000	0.100	0.100	0.100	0.300
% Recover	y .	102	92.6	99.6	99.7	102
Relative Pe	ercent Difference	2.2	3.8	7.7	5.6	7.5

METHODS: TRPHC - EPA SW-846 8015 M; BTEX - EPA SW-846 8260

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#### H4135A.XLS

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ANALYTICAL RESULTS FOR SAFETY & ENVIRONMENTAL SOLUTIONS, INC. ATTN: BOB ALLEN 703 E. CLINTON, SUITE 103 HOBBS, NM 88240 FAX TO:

Receiving Date: 05/07/99 Reporting Date: 05/11/99 Project Number: NOT GIVEN Project Name: NOT GIVEN Project Location: NOT GIVEN

Sampling Date: 05/07/99 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: AH Analyzed By: BC/AH

						ETHYL	TOTAL
LAB NUMBER	SAMPLE ID	TPH	Cl*	BENZENE	TOLUENE	BENZENE	XYLENES
		(mg/Kg)	(mg/K <b>g)</b>	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)
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H4143-1	BH #6	<10	32	< 0.002	<0.002	< 0.002	< 0.006
H4143-2	BH #9	<10	48	< 0.002	< 0.002	< 0.002	< 0.006
H4143-3	BH #10	<10	80	<0.002	<0.002	<0.002	<0.006
					· · · · · · · · · · · · · · · · · · ·		
Quality Control		3090	129	0.090	0.096	0.093	0.279
True Value QC		3000	132	0.100	0.100	0.100	0.300
% Recovery		103	98	90.0	95.8	92.7	92.8
<b>Relative</b> Percer	nt Difference	4.5	2.3	2.9	4.5	1.3	0.3

METHODS:

TRPHC-EPA SW-846 8015 M;CI-Std. Methods 4500-CFB; BTEX-EPA SW-846-8020 \*Analyses performed on 1:4 w/v aqueous extracts.

Burgess JA. Cooke. Ph. D.

PLEASE NOTE: Ltability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims waveling those for negligence and any other cause whatsoever shall be deemed waved unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.

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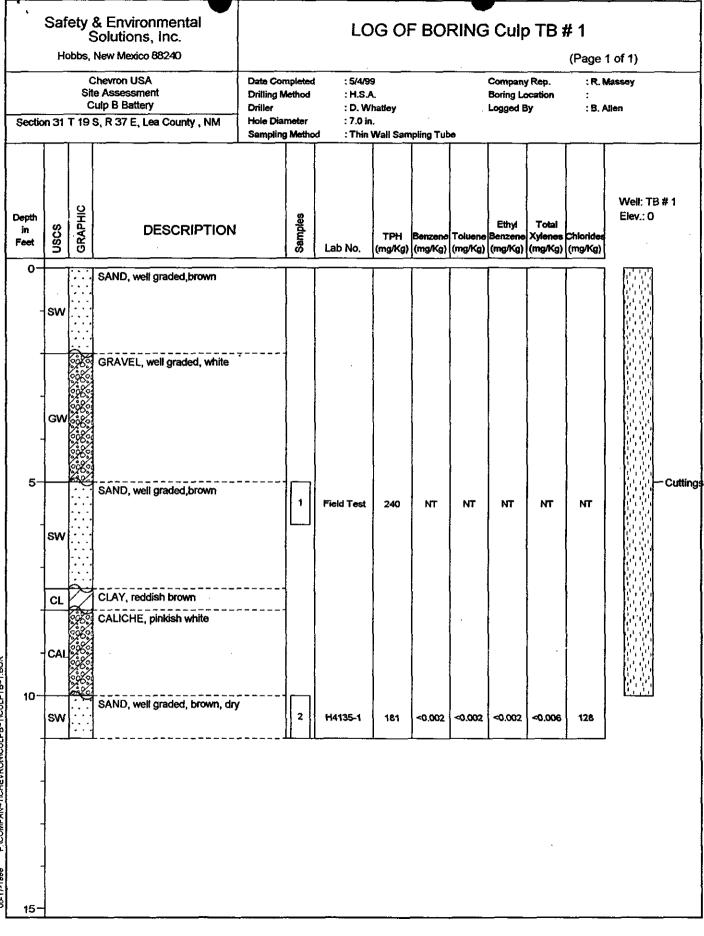
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Site Assessment Culp <u>B</u> <u>Battery Site</u>

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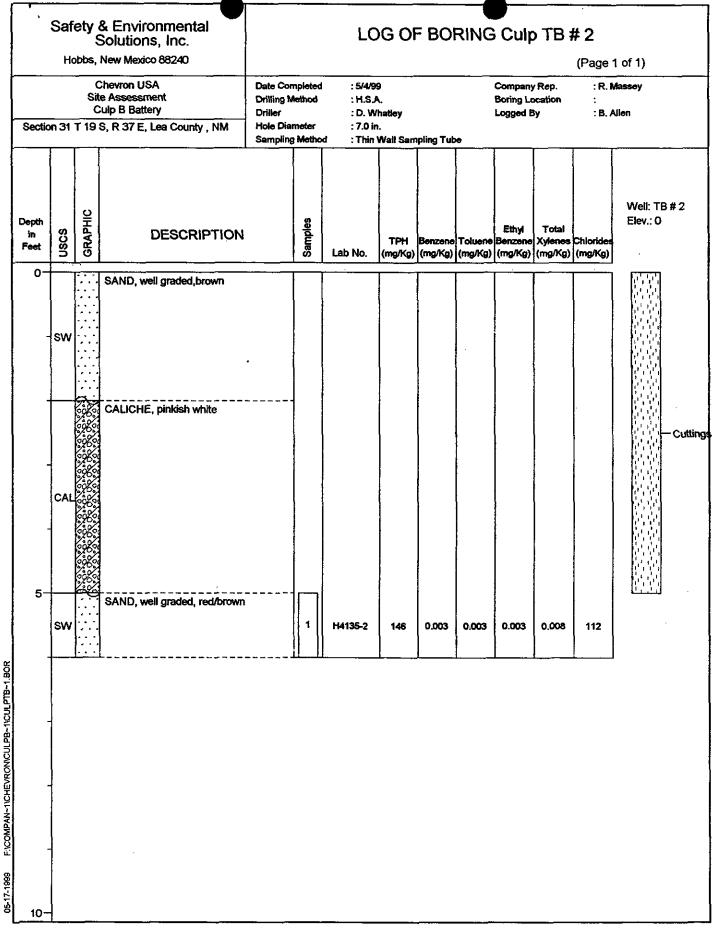
Chevron USA April 30, 1999

## Appendix B Logs of Borings

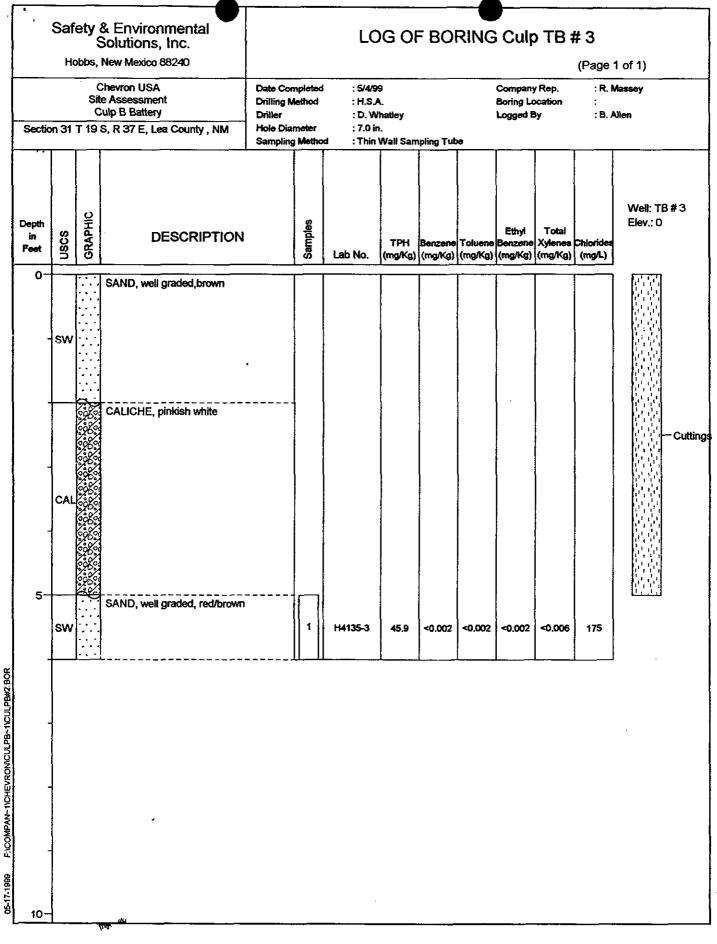


FACOMPAN~1/CHEVROMCULPB-1/CULPTB-1.BOR

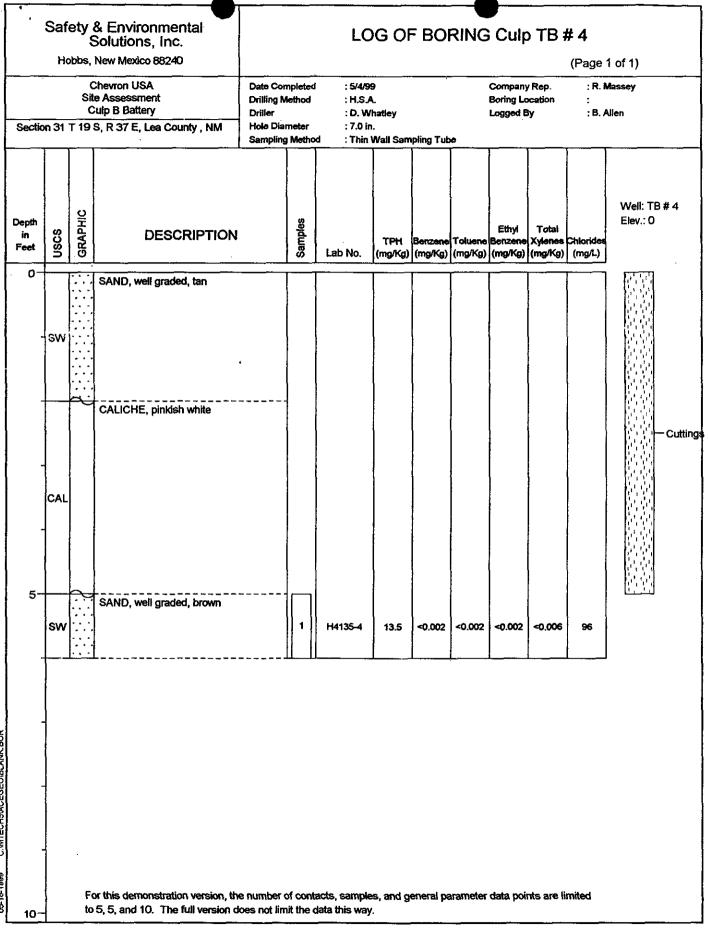
05-17-1999



FICOMPAN-11CHEVRONICULPB-11CULPTB-1.BOR



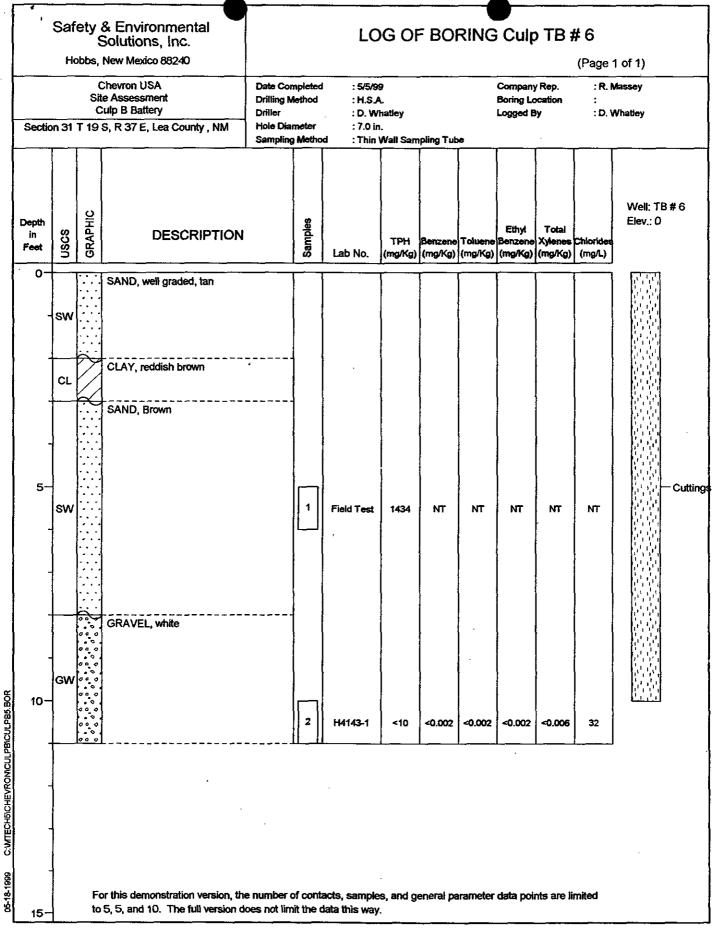
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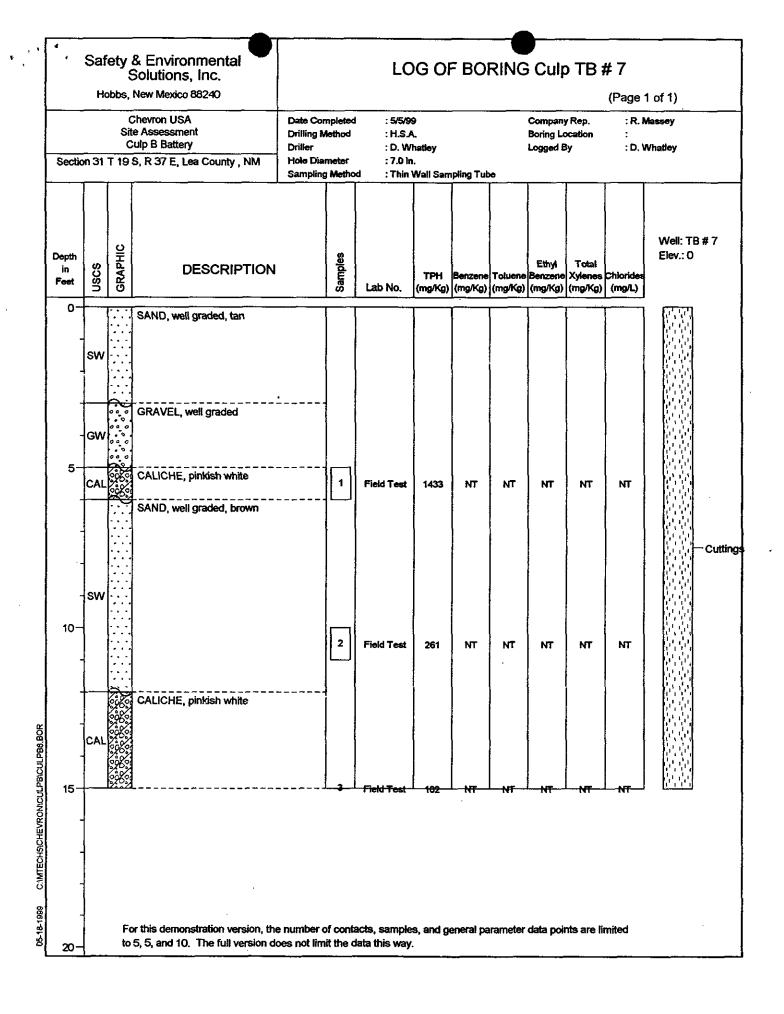


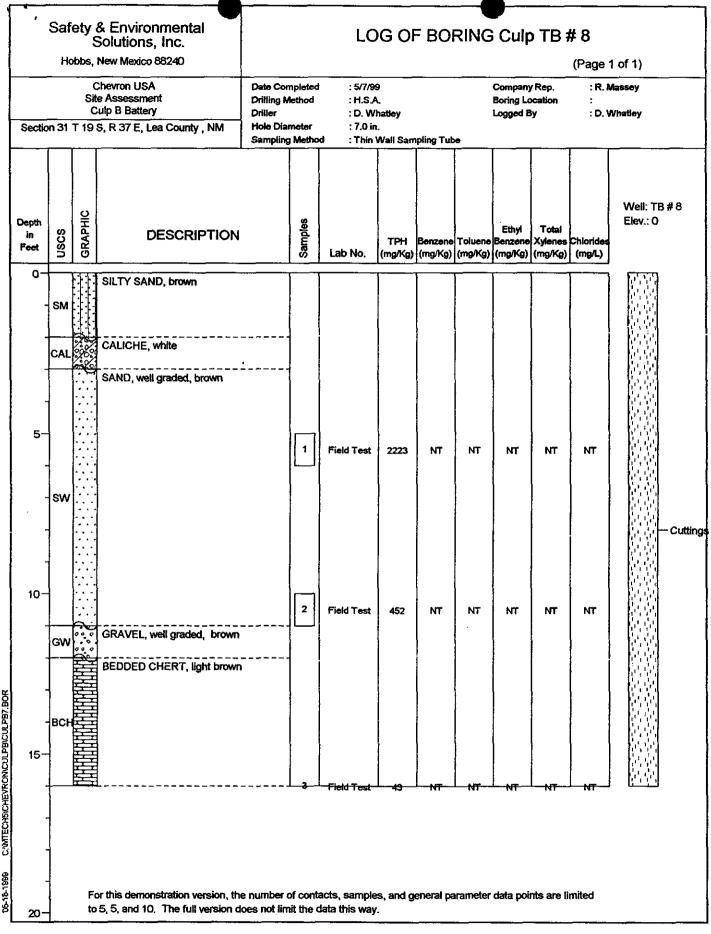
C:MTECHSACEGEOIBLANK.BOR

05-18-1999

		S	& Environmental Solutions, Inc. New Mexico 88240			LO	G O	F BO	RING	6 Culp	o TB i	# 5 (Page	1 of 1)
Sectio	xn 31	Sit	Chevron USA e Assessment ulp B Battery S, R 37 E, Lea County , NM	Date Compler Dritting Metho Dritter Hole Diamete Sampling Met	nd ar	: H.S.A : D. Wi : 7.0 in	hatley	npling Tut		Company Boring Logged E	ocation	: R.J : : 8.7	Massey Njen
Depth in Feet	USCS	GRAPHIC	DESCRIPTION		-	Lab No.	трн		Toluene	Ethyl Benzene (mg/Kg)	Total Xylenes (mg/Kg)	Chlorides (mg/L)	Well: TB # 5 Elev.: 0
0- - - -	sw		SAND, well graded, tan			Field Test	930	NT	NT	NT	NT	NT	Cutting
			or this demonstration version, the 5, 5, and 10. The full version de	e number of co		acts, sample	s, and g	<u>.</u>					ļ







CANTECH5ICHEVRONICULPBICULPB7.BOR

			& Environmental Solutions, Inc. New Mexico 88240	_		LO	G OI	F BO	RING	6 Culp	TB	<b># 9</b> (Page 1	1 of 1)
Sectio	on 31	Sit C	Chevron USA e Assessment ulp B Battery S, R 37 E, Lea County , NM	Date Complet Drilling Metho Driller Hole Diamete Sampling Met	od sr	: H.S.# : D. W : 7.0 in	hatley	- i'		Company Boring Lo Logged E	ocation	:	łassey Vhatley
Depth in Feet	Uscs	GRAPHIC	DESCRIPTION			Lab No.	Wall Sam TPH (mg/Kg)	Benzene	Toluene	Ethyl Benzene (mg/Kg)	Total Xylenes (mg/Kg)	Chlorides (mg/L)	Well: TB # 9 Elev.: 0
-0	SM	86 X 6 X 6 X 6 X 6 X 6 X 7 X 7 X 7 X 7 X	SILTY SAND, brown										
5-		0.00.00.00 0.00.00 0.00.00 0.00.00 0 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0				H4143-2	<10	<0.002	<0.002	<0.002	<0.006	48	
			or this demonstration version, the 5, 5, and 10. The full version de					eneral p	arameter	data poi	nts are li	imited	

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	Ho	obbs, C Situ C	& Environmental Solutions, Inc. New Mexico 88240 Chevron USA e Assessment sulp B Battery	Date Cor Dritling N Driller	lethod	: H.S./ : D. W	A. 'hatley			Company Boring Logged E	cation	:	1 of 1) Massey Whatley
Sectio	an 31	T 19 :	S, R 37 E, Lea County , NM	Hole Dia Sampling		: 7.0 ir xd : Thin		npling Tub	æ	Ţ	r	<u> </u>	
Depth in Feet	uscs	GRAPHIC	DESCRIPTION		Samples	Lab No.		Benzene (mg/Kg)				Chlorides (mg/L)	Well: TB # Elev.: 0
0-	SM	┙╸╸╸╸╸╸╸╸╴╴╴╸╸╸╸╸╸╸╸╸╸╸╸╸╸╸╸╸╸╸╸╸╸╸╸╸╸	SILTY SAND, brown										
5-	CAL	22022020000000000000000000000000000000	CALICHE, pinkish white		1	H4143-2	<10	<0.002	<0.002	<0.002	<0.006	48	
10-													