GW-025

Investigation Report

DATE:
2005

Larson & Associates, Inc.
Environmental Consultants

November 1, 2005

VIA EMAIL: wayne.price@state.nm.us

Mr. Wayne Price
Environmental Engineer
State of New Mexico - Oil Conservation Division
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Free Product Investigation Report, Targa Resources, Inc., Monument Gas Plant (GW-025), UL A (NE/4, NW/4), Section 1, Township 20 South, Range 36 East, Lea County, New Mexico

Dear Mr. Price:

This report is submitted to the New Mexico Oil Conservation Division ("OCD") on behalf of Targa Resources, Inc. ("TRI"), successor to Dynegy Midstream Services, L.P. ("DMS"), by Larson and Associates, Inc. ("LA"), agent, and documents the results of an investigation to determine the down gradient limit of phase-separated hydrocarbons ("PSH") on groundwater at its Monument Gas Plant ("Facility"). The Facility is located in unit letter A (NE/4, NW/4), Section 1, Township 20 South, Range 36 East, Lea County, New Mexico. Figure 1 presents a location and topographic map. Figure 2 presents a Facility drawing.

Background

On April 24, 2003, OCD requested DMS to submit a work plan to install monitoring wells to determine the down gradient and lateral extent of PSH on groundwater. In May 2003, during a technical meeting with OCD, DMS committed to recovering PSH in wells WP-4, WP-12, WP-14 and WP-15. On June 27, 2003, DMS submitted a work plan that proposed installing three (3) monitoring wells down gradient (southeast) of the Facility. On September 10, 2003, OCD conditionally approved the plan and granted an extension for submittal of a report until June 30, 2004. Following a technical meeting on May 17, 2005, OCD requested DMS to submit a work plan to determine the limit of PSH down gradient of wells WP-4 and WP-4R and WP-14. On June 30, 2005, OCD approved a request to proceed in accordance with the work plan approved on September 10, 2003. Appendix A presents correspondence with OCD.

In June 2003, pneumatic skimmer pumps (GeoTech, Inc., Model PRS) were installed in wells WP-4, WP-12, WP-14 and WP-15 and PSH recovery was initiated. The PSH was pumped into 55-gallon drums equipped with level controls and approximately 220 gallons of water and PSH was discharged to the waste water system at the Facility.

On December 16, 2003, well WP-4 was replaced with well WP-4R, as it was determined that PSH recovery in well WP-4 was not technically feasible due to no groundwater and PSH near the bottom of the well. Scarborough Drilling, Inc. ("Scarborough"), located in Lamesa, Texas, drilled the well WP-4R into shale or red bed that underlies the water-bearing at approximately 36 feet below ground surface ("bgs") using a truck-mounted air rotary rig. The well was completed

with threaded 4-inch schedule 40 PVC casing and screen. Drill cuttings were examined according to the Unified Soil Classification System ("USCS") and recorded on a field log form. Approximately 20 feet of screen was placed near the bottom of the well, and extends above and below the water level. The annular space between the screen and boring was filled with graded silica sand to approximately 2 feet above the screen. A layer of bentonite chips approximately 2 feet thick was placed above the sand and hydrated with potable water. The remainder of the annulus was filled with a mixture of cement and bentonite grout to about 1-foot bgs. The well was secured with a locking steel protector anchored in concrete. Piper Surveying, Inc ("Piper"), a professional land surveyor registered in the State of New Mexico, measured the top-of-casing and ground elevation. Drill cuttings were placed on the ground adjacent to the well, and the drill rig and down-hole equipment (i.e., bit, rods, etc.) were thoroughly washed using pressurized hot water. Table 1 presents a summary of well drilling and completion details. Appendix B presents the boring log and well record.

Current Investigation

On August 4, 2005, Scarborough drilled monitoring wells WP-16, WP-17 and WP-18 down gradient (southeast) of the Facility using the air rotary rig. Samples of drill cuttings were examined according to the USCS and recorded on field log forms. The wells were drilled into red bed encountered between approximately 36 feet bgs (WP-17) and 42 feet bgs (WP-18). The wells were constructed using threaded 2-inch schedule 40 PVC screen and casing. Approximately 20 feet of screen was installed near the bottom of each boring and extends above and below the water table. The annular space between the screen and boring was filled with graded silica sand to approximately 1.5 feet above the screen. A layer of bentonite chips approximately 2 feet was placed above the sand and hydrated with potable water. The remainder of the annulus was filled with a mixture of cement and bentonite grout to approximately 1-foot bgs. The wells are secured with locking above-grade steel covers anchored in concrete. Table 1 presents a summary of the monitoring well drilling and completion details. Figure 2 presents a Facility drawing and monitoring well locations. Appendix B presents boring logs and well completion records.

Depth-to-groundwater and PSH was measured in the new and existing monitoring wells using an electronic oil and water interface probe. The measurements were recorded in feet below the top of the PVC well casing and documented in a bound field book. On October 7, 2005, groundwater occurred in wells WP-16, WP-17 and WP-18 at approximately 32.02 feet bgs, 33.54 feet bgs and 32.72 feet bgs, respectively. The saturated thickness of the water-bearing stratum was approximately 5.98 feet (WP-16), 2.46 feet (WP-17) and 8.28 feet (WP-18). Table 2 presents a summary of depth-to-groundwater and PSH thickness measurements. Figure 3 presents a groundwater potentiometric map.

On August 9, 2005, wells WP-16, WP-17 and WP-18 were developed to remove fine-grained sediment disturbed during drilling. No PSH was observed in the wells, and development was accomplished by hand bailing with dedicated disposable polyethylene bailers until water was visually clear of sediment. The water was placed in a portable tank and discharged to the waste water system at the Facility. Samples of groundwater were collected from wells WP-16, WP-17 and WP-18 using the dedicated bailers, and carefully transferred to laboratory-preserved containers. The containers were labeled, chilled in an ice chest and hand-delivered under chain-of-custody control to Environmental Lab of Texas, Inc. ("ELTI"), located in Odessa, Texas,

which analyzed the samples for benzene, toluene, ethyl benzene and xylene (commonly referred to as BTEX) using method SW-846-8021B. Table 3 presents a summary of the BTEX analysis. Figure 4 presents benzene concentrations reported in groundwater samples from wells WP-16, WP-17 and WP-18. Appendix C presents the laboratory report.

On September 13, 2005, PSH (0.01 feet) was reported in well WP-18, and a sample was collected for fingerprint analysis. The sample was collected using a dedicated polyethylene bailer and canted into an unpreserved 40-milliliter sample vial, which was labeled, chilled in an ice chest and hand delivered under chain-of-custody control to ELTI. ELTI analyzed the PSH sample using gas chromatography ("GC"). Table 4 presents a summary of the GC analysis. Figure 5 presents PSH thickness measurements from the wells on October 7, 2005. Figure 6 presents a hydrocarbon concentration control chart for the fingerprint analysis. Appendix C presents the laboratory report.

On September 27, 2005, PSH recovery was initiated at well WP-18. The PSH is hand-bailed weekly using a dedicated polyethylene bailer and collected in a 55-gallon drum, which will be discharged to the waste water system at the Facility.

Conclusions

The direction and gradient of groundwater flow beneath the Facility (October 7, 2005) was from northwest to southeast at approximately 0.008 feet per foot, and consistent with data previously reported to OCD (May 15, 2005).

The New Mexico Water Quality Control Commission ("WQCC") human health standard for benzene in groundwater is 0.01 milligrams per liter ("mg/L"), and was exceeded in samples from wells WP-17 (5.28 mg/L) and WP-18 (1.03 mg/L) on August 9, 2005.

The WQCC human health standard for ethyl benzene in groundwater is 0.75 mg/L, and was exceeded in the sample from monitoring well WP-17 (1.22 mg/L) on August 9, 2005.

The PSH observed in well WP-18 (0.04 feet) is chemically consistent with PSH reported from wells WP-4 and WP-15.

Recommendations

TRI proposes to continue monitoring PSH in wells WP-4, WP-12, WP-14, WP-15 and WP-18 on a weekly schedule, and remove PSH when it is present. DMS will also integrate wells WP-16, WP-17 and WP-18 into the Facility's groundwater monitoring program, which will include:

- Measuring depth-to-groundwater and PSH in all monitoring wells on a quarterly (4 times per year) schedule;

- Collecting groundwater samples from monitoring wells WP-1, WP-5, WP-6, WP-7, WP-13, WP-14, WP-16, WP-17 and WP-18 during the second quarterly period (April through June) for BTEX, chloride, total dissolved solids ("TDS"), sulfate, and dissolved metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver) analysis;

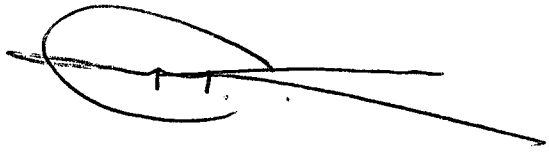
- Collecting groundwater samples from down gradient monitoring wells WP-1, WP-5, WP-14, WP-16, WP-17 and WP-18 during the fourth quarterly period (October through December) for BTEX, chloride, TDS, and sulfate analysis; and

- Preparing an annual report for submittal to the NMOCD.

Please call Mr. Cal Wrangham with TRI at (432) 687-0542 or myself at (713) 507-6752 if you have questions.

Sincerely,

Larson and Associates, Inc.



Mark J. Larson, P.G., C.G.P., C.G.W.P.
Senior Project Manager/President

Encl.

cc: Cal Wrangham/TRI
Todd Young/TRI
Chris Williams/OCD District 1

Tables

Table 1: **Summary of Monitoring Well Drilling and Completion Details**
Dynegy Midstream Services, L. P., Monument Gas Plant
Unit C (NE/4, NW/4), Section 1, Township 20 South, Range 36 East,
Lea County, New Mexico

Well Number	Date Drilled	Top of Casing Elevation (Feet AMSL)	Ground Elevation (Feet AMSL)	Drilled Depth (Feet BGS)	Casing Stickup (Feet)	Well Diameter (Inches)	Screen Interval (Feet BGS)	Depth-to-Groundwater 10-07-05 (Feet TOC)
WP-4R	12/16/03	3578.35	3575.91	38.0	2.44	4	18.00 - 38.00	33.23
WP-16	8/4/2005	3575.83	3573.74	40.0	2.09	2	18.49 - 38.49	34.11
WP-17	8/4/2005	3579.34	3577.10	38.0	2.24	2	17.49 - 37.49	35.78
WP-18	8/4/2005	3579.24	3577.04	45.00	2.20	2	24.49 - 44.49	*34.92
								('0.04')

Notes: Wells drilled by Scarborough Drilling, Inc., Lamesa, Texas, and constructed with threaded 2 inch schedule 40 PVC screen and casing

1. BGS: Depth in feet below ground surface
2. AMSL: Elevation in feet above mean sea level
3. TOC: Depth in feet below top-of-casing
4. *: Corrected for free product thickness shown in parenthesis

Table 2: Summary of Depth-to-Groundwater and Hydrocarbon Product Thickness Measurements
Dynegy Midstream Services, L.P., Monument Gas Plant
Unit C (NE/4, NW/4), Section 1, Township 20 South, Range 36 East
Lea County, New Mexico

Date	WP-1	WP-2	WP-4	WP-4R	WP-5	WP-6	WP-7	WP-10	WP-11	WP-12	WP-13	WP-14	WP-15	WP-16	WP-17	WP-18
04/26/2002	27.42 *(3550.59)*	31.09 *(3546.68)*	*35.75 (0.35') *(3541.40)*	--	31.61 *(3547.89)*	*28.77 (0.06') *(3556.59)*	29.45 *(3553.59)*	*27.13 (0.02') *(3552.95)*	28.31 *(3552.92)*	*38.36 (0.50') *(3543.53)*	28.19 *(3551.46)*	*42.41 (0.14') *(3539.40)*	*32.31 (0.72') *(3549.96)*	--	--	--
06/06/2002	27.55 *(3550.46)*	31.14 *(3546.63)*	*35.77 (0.31') *(3541.38)*	--	31.56 *(3547.94)*	*28.75 (0.10') *(3556.61)*	30.11 *(3552.93)*	27.04 (0.03') *(3553.04)*	28.24 *(3552.99)*	*38.36 (0.52') *(3543.53)*	28.24 *(3551.41)*	*42.40 (0.18') *(3539.41)*	*32.32 (0.71') *(3549.95)*	--	--	--
09/30/2002	24.15 *(3553.86)*	Dry	*36.07 (0.44') *(3541.08)*	--	33.03 *(3546.47)*	*28.74 (0.04') *(3556.62)*	31.38 *(3551.66)*	26.00 *(3554.08)*	27.21 *(3554.02)*	*38.14 (0.47') *(3543.75)*	25.90 *(3553.75)*	*42.22 (0.10') *(3539.59)*	*32.06 (0.67') *(3550.21)*	--	--	--
12/19/2002	24.64 (3553.37)	Dry	*36.28 (0.44') *(3540.87)*	--	33.75 *(3545.75)*	*28.86 (0.30') *3556.50*	31.80 *(3551.24)*	25.71 *3554.37)*	26.90 *(3554.33)*	*37.81 (0.22') *(3544.08)*	26.58 *(3553.07)*	*42.09 (0.13') *(3539.72)*	*31.85 (0.55') *(3550.42)*	--	--	--
04/02/2003	27.34 (3550.67)	32.43 *(3545.34)*	*37.22 (0.62') *(3539.93)*	--	34.30 *(3545.20)*	*28.80 (0.04') *(3556.56)*	32.14 *(3550.90)*	26.17 *(3553.91)*	27.32 *(3553.91)*	*37.99 (0.30') *(3543.90)*	27.51 *(3552.14)*	*41.94 (0.09') *(3539.87)*	*32.25 (0.48') *(3550.02)*	--	--	--
06/19/2003	28.87 (3549.14)	Dry	Dry	--	34.36 *(3545.14)*	*28.83 (0.05') *(3556.53)*	34.36 *(3548.68)*	26.50 *(3553.58)*	27.68 *(3553.55)*	*37.94 (0.26') *(3543.95)*	28.30 *(3551.35)*	*41.84 (0.07') *(3539.97)*	*32.23 (0.30') *(3550.04)*	--	--	--
09/23/2003	30.11 *(3547.90)*	Dry	Dry	--	35.16 *(3544.34)*	*28.80 (0.06') *(3556.56)*	32.50 *(3550.54)*	27.11 *(3,552.97)*	28.24 *(3552.99)*	*38.47 (0.45') *(3543.42)*	28.89 *(3550.76)*	*42.35 (0.12') *(3539.46)*	32.23 *(3550.04)*	--	--	--
12/19/2003	30.61 *(3547.40)*	Dry	*37.33 (0.07') *(3539.82)*	--	35.61 *(3543.89)*	*28.80 (0.05') *(3556.56)*	32.70 *(3550.34)*	27.36 *(3552.72)*	28.51 *(3552.72)*	*38.50 (0.06') *(3543.39)*	29.20 *(3550.45)*	*42.85 (0.18') *(3538.96)*	32.34 *(3549.93)*	--	--	--
03/18/2004	30.24 *(3547.77)*	Dry	--	38.14 *(3540.21)*	36.17 *(3543.33)*	*29.92 (1.17') *(3555.44)*	32.91 *(3550.13)*	27.56 *(3552.52)*	28.76 *(3552.47)*	*38.70 (0.06') *(3543.19)*	28.84 *(3550.81)*	42.90 *(3538.91)*	32.51 *(3549.76)*	--	--	--
06/30/2004	25.65 *(3552.36)*	Dry	37.28 *(3539.87)*	37.58 *(3540.77)*	35.87 *(3543.63)*	*29.85 (1.12') *(3555.51)*	32.05 *(3550.99)*	26.84 *(3553.24)*	28.03 *(3553.20)*	*38.56 (0.16') *(3543.33)*	27.91 *(3551.74)*	*41.88 (0.08') *(3539.93)*	32.38 *(3549.89)*	--	--	--
09/08/2004	25.79 *(3552.22)*	Dry	37.34 *(3539.81)*	37.62 *(3540.73)*	36.07 *(3543.43)*	28.74 *(3556.62)*	32.15 *(3550.89)*	26.59 *(3553.49)*	27.81 *(3553.42)*	*38.34 (0.11') *(3543.55)*	27.81 *(3551.84)*	*41.99 (0.05') *(3539.82)*	32.28 *(3549.99)*	--	--	--
12/27/2004	21.11 *(3,556.90)*	27.69 *(3550.08)*	31.56 *(3545.59)*	31.32 *(3547.03)*	29.52 *(3549.98)*	27.46 *(3557.90)*	26.09 *(3556.95)*	23.40 *(3556.68)*	24.56 (3556.67)	35.52 *(3546.37)*	24.07 *(3555.58)*	33.16 *(3548.65)*	28.91 *(3553.36)*	--	--	--
04/04/2005	33.15 *(3544.86)*	28.75 *(3549.02)*	33.05 *(3544.10)*	33.15 *(3545.20)*	29.78 *(3549.72)*	28.72 *(3556.64)*	27.35 *(3555.69)*	24.29 *(3555.79)*	25.41 *(3555.82)*	32.13 *(3549.76)*	23.57 *(3556.08)*	31.17 *(3550.64)*	Dry	--	--	--
05/12/2005	25.63 *(3552.38)*	28.75 *(3549.02)*	33.15 *(3544.00)*	33.26 *(3545.09)*	29.51 *(3549.99)*	28.71 *(3556.65)*	26.65 *(3556.39)*	24.81 *(3555.27)*	25.96 *(3555.27)*	32.07 *(3549.82)*	25.12 *(3554.53)*	32.06 *(3549.75)*	Dry	--	--	--
10/07/2005	23.83 *(3554.18)*	28.77 *(3549.00)*	33.08 *(3544.07)*	33.23 *(3545.12)*	29.78 *(3549.72)*	28.74 *(3556.62)*	27.70 *(3555.34)*	25.11 *(3554.97)*	26.16 *(3555.07)*	33.24 *(3548.65)*	26.26 *(3553.39)*	34.47 *(3547.34)*	31.44 *(3550.83)*	34.11 *(3541.72)*	35.78 *(3543.56)*	*34.92 (0.04') *(3544.32)*

Notes:
1. *: Hydrocarbon product in well and thickness in parenthesis.
2. (*3554.18*): Groundwater elevation in feet above mean sea level (AMSL)
3. --: No data available

All measurements in feet below top of PVC well casing.

Table 3: Summary of BTEX Analysis of Groundwater Samples from Monitoring Wells
Dynegy Midstream Services, L.P., Monument Gas Plant
Unit C (NE/4, NW/4), Section 1, Township 20 South, Range 36 East
Lea County, New Mexico

Monitoring Well	Sample Date	Benzene (mg/L)	Toluene (mg/L)	Ethylbenzene (mg/L)	Xylene (mg/L)
NMWQCC Standard		0.01	0.75	0.75	0.62
WP-1	06/06/02	1.93	<0.010	0.032	<0.020
	12/19/02	2.24	<0.100	0.161	0.151
	06/19/03	3.46	<0.025	0.146	0.08
	12/03/03	1.6	0.011	0.143	0.029
	07/01/04	1.1	<0.050	<0.0500	<0.0500
	12/27/04	1.73	<0.050	<0.050	<0.050
	06/14/05	1.73	0.00321	0.006	0.0033
WP-5	06/06/02	0.089	0.002	<0.001	<0.002
	12/19/02	0.339	0.002	<0.001	0.003
	06/19/03	2.37	<0.005	<0.005	<0.010
	12/03/03	3.97	<0.010	<0.010	<0.020
	07/01/04	2.85	<0.050	<0.050	<0.050
	12/27/04	2.74	<0.020	<0.020	<0.020
	06/14/05	3.61	<0.020	0.0109	<0.020
WP-6	06/07/02	0.021	0.004	0.06	0.014
	06/14/05	0.00808	0.0105	0.0155	0.0344
WP-7	06/07/02	<0.001	0.001	<0.001	<0.002
	06/19/03	<0.001	0.001	<0.001	<0.002
	07/01/04	<0.001	<0.001	<0.001	<0.001
	06/14/05	<0.001	<0.001	<0.001	<0.001
WP-10	07/01/04	1.98	<0.100	0.327	<0.100

Table 3: **Summary of BTEX Analysis of Groundwater Samples from Monitoring Wells**
Dynegy Midstream Services, L.P., Monument Gas Plant
Unit C (NE/4, NW/4), Section 1, Township 20 South, Range 36 East
Lea County, New Mexico

Monitoring Well	Sample Date	Benzene (mg/L)	Toluene (mg/L)	Ethylbenzene (mg/L)	Xylene (mg/L)
NMWQCC Standard		**0.01**	**0.75**	**0.75**	**0.62**
WP-11	07/01/04	3.05	<0.500	<0.500	<0.500
WP-13	06/07/02	0.842	0.022	0.123	0.074
	06/19/03	1.11	0.043	0.2	<0.121
	07/01/04	0.586	<0.100	<0.100	<0.100
	06/14/05	0.804	0.00721	0.064	0.01491
WP-14	06/07/02	0.012	0.002	0.009	0.021
	12/19/02	0.025	0.006	0.011	0.034
	12/27/04	0.199	<0.020	<0.020	<0.020
	06/14/05	0.422	0.00367	0.0133	0.02325
WP-16	08/09/05	0.00438	<0.001	<0.001	<0.001
WP-17	08/09/05	5.28	0.0909	1.22	0.2828
WP-18	08/09/05	1.03	0.0294	0.354	0.2329
Duplicates					
WP-1	12/03/03	1.68	0.012	0.155	0.023
WP-10	07/01/04	1.91	<0.200	0.322	<0.200
WP-5	12/27/04	2.45	<0.020	<0.020	<0.020
WP-1	06/14/05	1.63	0.00256	0.00527	0.00324

Notes: Analysis performed by Environmental Lab of Texas, Inc., Odessa, Texas, using metod SW-846-8021B.
1. mg/L: Milligrams per liter
2. <: Less than method detection limit.

Table 4: **Summary Hydrocarbon Product Fingerprint Analysis**
Dynegy Midstream Services, L.P., Monument Gas Plant
Unit C (NE/4, NW/4), Section 1, Township 20 South, Range 36 East
Lea County, New Mexico

Sample Number	Sample Date	C6 - C8 (%)	>C8 - C10 (%)	>C10 - C12 (%)	>C12 - C16 (%)	>C16 - C21 (%)	>C21 - C35 (%)
WP-4	06/04/03	9.72	5.91	11.2	55.0	11.6	6.64
WP-6	06/04/03	4.28	15.6	11.1	20.2	1.63	47.2
WP-15	06/04/03	4.42	15.8	15.9	51.2	11.1	1.5
WP-18	09/13/05	6.26	15.4	15.8	49.7	11.7	1.14

Notes: Analysis performed by Environmental Lab of Texas, Inc., Odessa, Texas, using gas chromatography
1. %: Percent

Figures

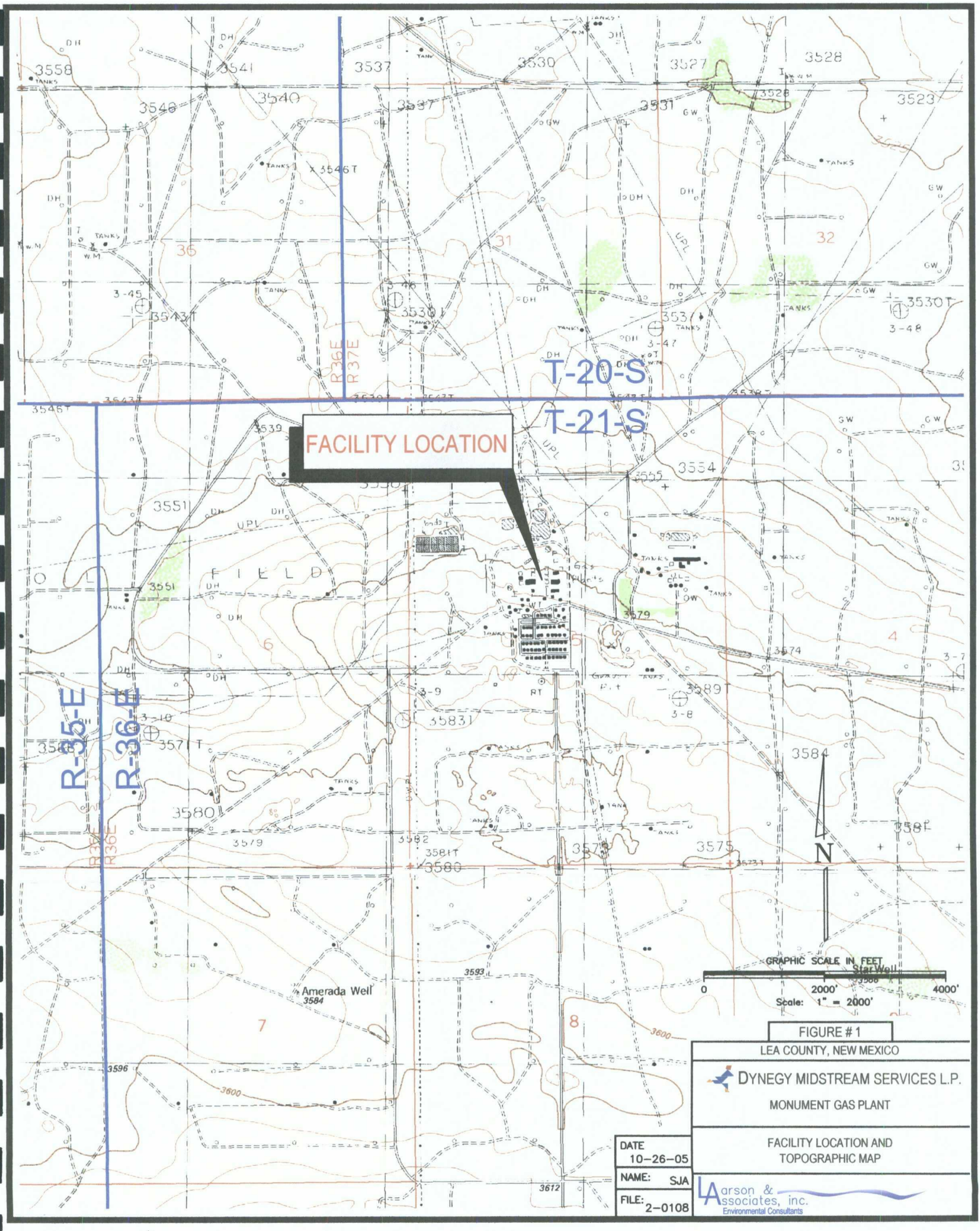


FIGURE # 1

LEA COUNTY, NEW MEXICO

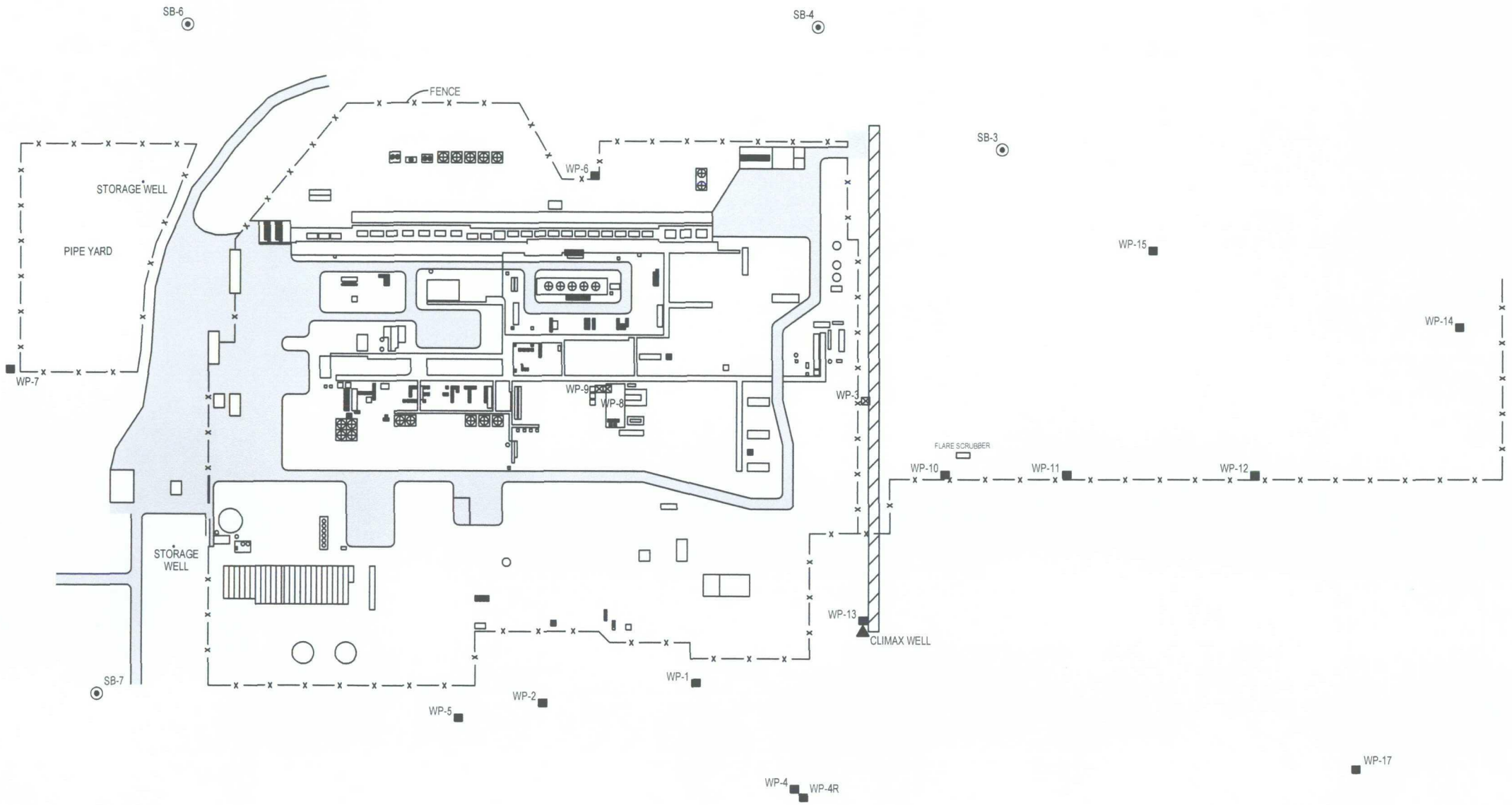
DYNEGY MIDSTREAM SERVICES L.P.

MONUMENT GAS PLANT

FACILITY LOCATION AND TOPOGRAPHIC MAP

DATE	10-26-05
NAME:	SJA
FILE:	2-0108

Larson & Associates, inc.
Environmental Consultants



MONITORING WELL DATA

WELL NUMBER	TOP OF CASING ELEVATION (FEET) AMSL
WP-1	3578.01
WP-2	3577.77
WP-3	3581.21
WP-4	3577.15
WP-4R	3578.35
WP-5	3579.50
WP-6	3585.36
WP-7	3583.04
WP-8	---
WP-9	---
WP-10	3580.08
WP-11	3581.23
WP-12	3581.89
WP-13	3580.56
WP-14	3581.81
WP-15	3582.27
WP-16	3575.83
WP-17	3579.34
WP-18	3579.24

GRAPHIC SCALE IN FEET

0 250' 500'

Scale: 1" = 250'

LEGEND

SB-7 ⊙ - SOIL BORING LOCATION

WP-1 ■ - MONITORING WELL LOCATION

WP-3 ⊠ - MONITORING WELL LOCATION CONVERTED TO CATHOTIC PROTECTION WELL

FIGURE # 2

LEA COUNTY, NEW MEXICO

DYNEGY MIDSTREAM SERVICES L.P.

MONUMENT GAS PLANT

FACILITY DRAWING

DATE 10-25-05

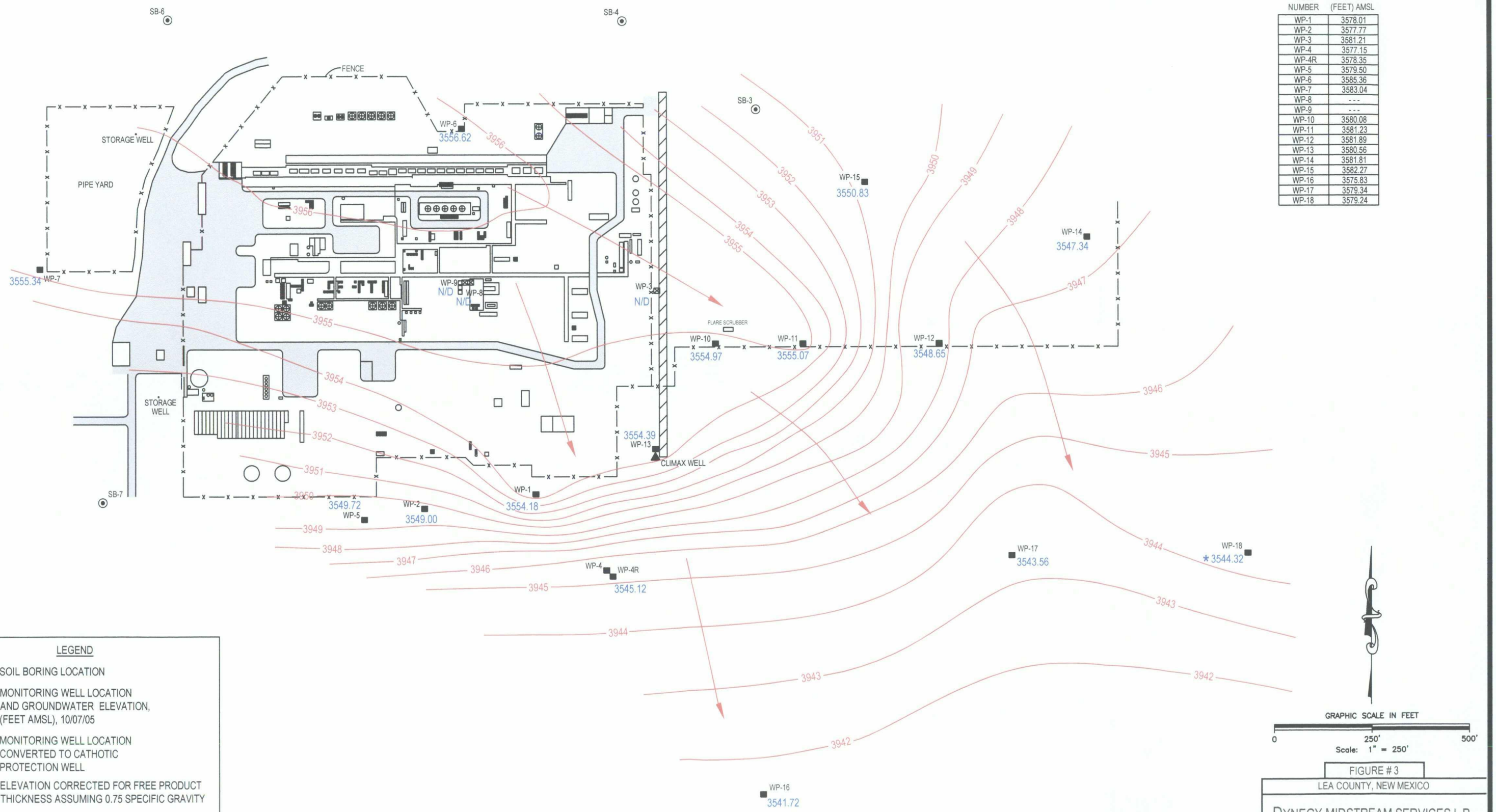
NAME: SJA

FILE: 2-0108

Larson & Associates, inc. Environmental Consultants

MONITORING WELL DATA

WELL NUMBER	TOP OF CASING ELEVATION (FEET) AMSL
WP-1	3578.01
WP-2	3577.77
WP-3	3581.21
WP-4	3577.15
WP-4R	3578.35
WP-5	3579.50
WP-6	3585.36
WP-7	3583.04
WP-8	---
WP-9	---
WP-10	3580.08
WP-11	3581.23
WP-12	3581.89
WP-13	3580.56
WP-14	3581.81
WP-15	3582.27
WP-16	3575.83
WP-17	3579.34
WP-18	3579.24



LEGEND

- SB-7 ⊙ - SOIL BORING LOCATION
- WP-1 3554.18 ■ - MONITORING WELL LOCATION AND GROUNDWATER ELEVATION, (FEET AMSL), 10/07/05
- WP-3 ⊠ N/D - MONITORING WELL LOCATION CONVERTED TO CATHOTIC PROTECTION WELL
- * - ELEVATION CORRECTED FOR FREE PRODUCT THICKNESS ASSUMING 0.75 SPECIFIC GRAVITY
- → - GROUNDWATER FLOW DIRECTION
- 3539 - CONTOUR OF GROUNDWATER POTENTIOMETRIC SURFACE ELEVATION, (FEET AMSL), 10/07/05

GRAPHIC SCALE IN FEET

0 250' 500'

Scale: 1" = 250'

FIGURE # 3

LEA COUNTY, NEW MEXICO

DYNEGY MIDSTREAM SERVICES L.P.

MONUMENT GAS PLANT

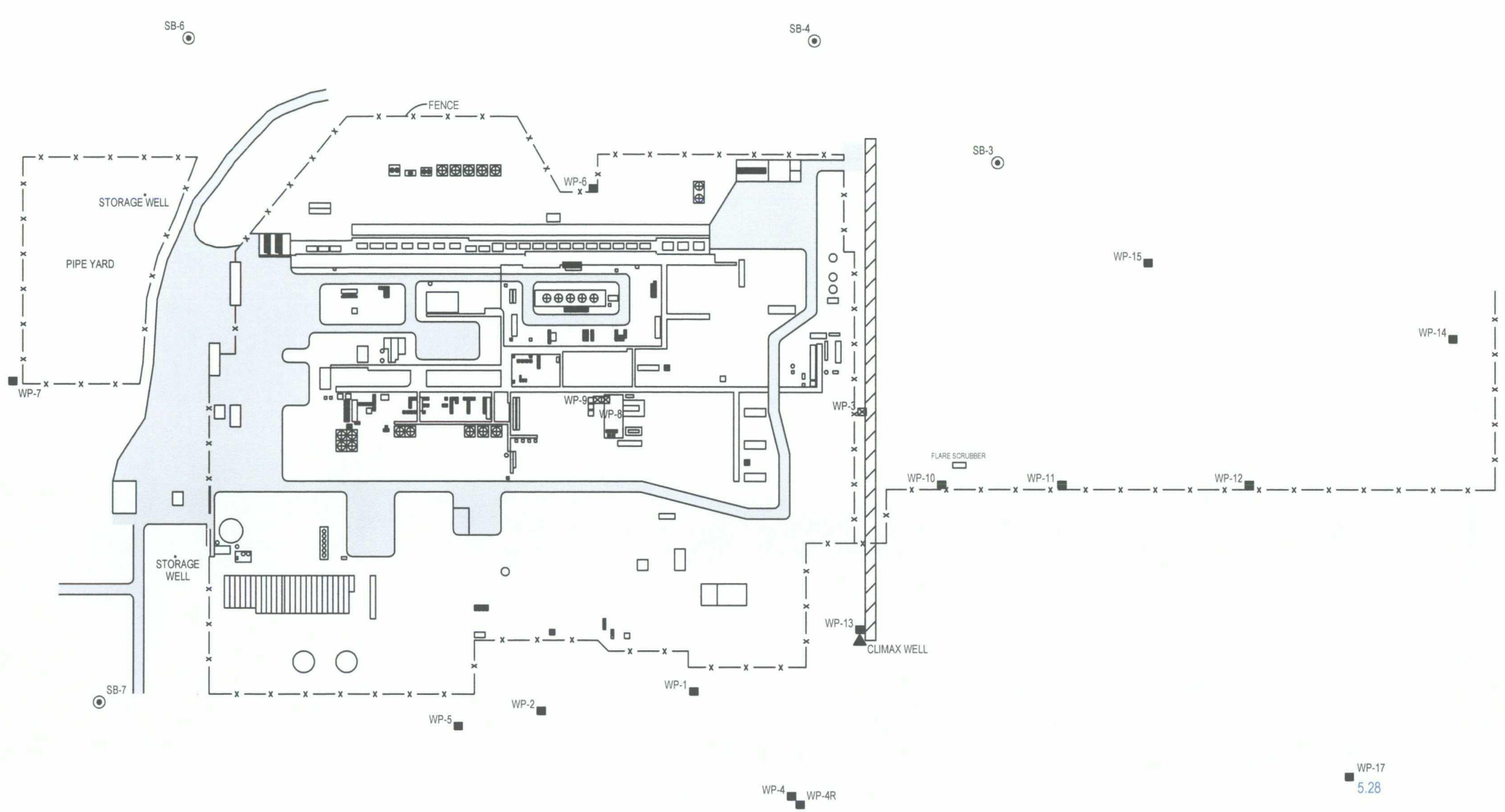
GROUNDWATER POTENTIOMETRIC SURFACE MAP
OCTOBER 7, 2005

DATE	10-25-05
NAME:	SJA
FILE:	2-0108

Larson & Associates, inc.
Environmental Consultants

MONITORING WELL DATA

WELL NUMBER	TOP OF CASING ELEVATION (FEET) AMSL
WP-1	3578.01
WP-2	3577.77
WP-3	3581.21
WP-4	3577.15
WP-4R	3578.35
WP-5	3579.50
WP-6	3585.36
WP-7	3583.04
WP-8	---
WP-9	---
WP-10	3580.08
WP-11	3581.23
WP-12	3581.89
WP-13	3580.56
WP-14	3581.81
WP-15	3582.27
WP-16	3575.83
WP-17	3579.34
WP-18	3579.24



LEGEND

- SB-7 ⊙ - SOIL BORING LOCATION
- WP-18 ■ 1.03 - MONITORING WELL LOCATION, AND BENZENE CONCENTRATION IN GROUNDWATER, MS/L, 8/9/05
- WP-3 ⊠ - MONITORING WELL LOCATION CONVERTED TO CATHOTIC PROTECTION WELL

GRAPHIC SCALE IN FEET

0 250' 500'

Scale: 1" = 250'

FIGURE # 4

LEA COUNTY, NEW MEXICO

DYNEGY MIDSTREAM SERVICES L.P.

MONUMENT GAS PLANT

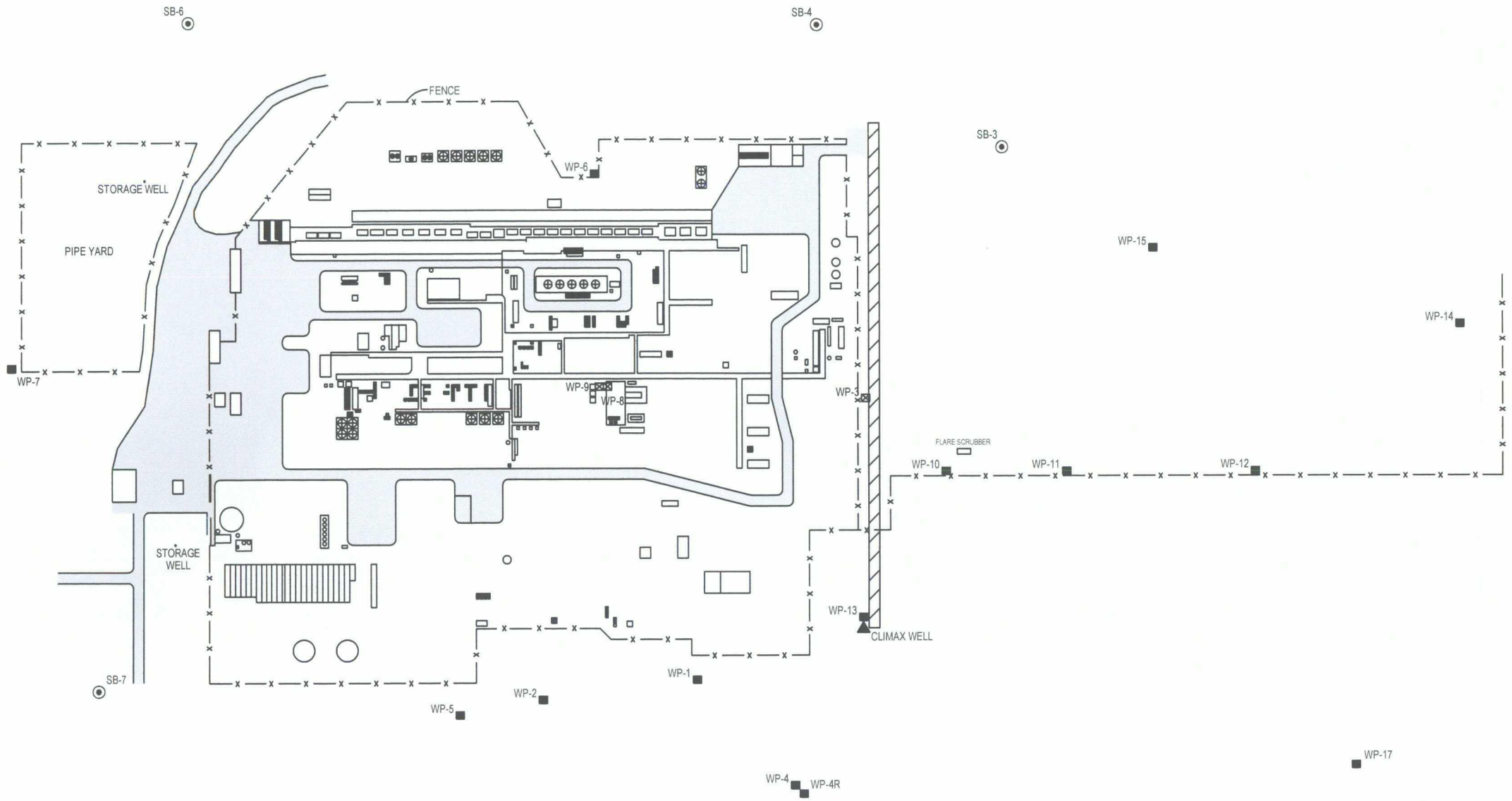
BENZENE CONCENTRATION IN GROUNDWATER
AUGUST 9, 2005

DATE 10-26-05
NAME: SJA
FILE: 2-0108

Larson & Associates, inc.
Environmental Consultants

MONITORING WELL DATA

WELL NUMBER	TOP OF CASING ELEVATION (FEET) AMSL
WP-1	3578.01
WP-2	3577.77
WP-3	3581.21
WP-4	3577.15
WP-4R	3578.35
WP-5	3579.50
WP-6	3585.36
WP-7	3583.04
WP-8	---
WP-9	---
WP-10	3580.08
WP-11	3581.23
WP-12	3581.89
WP-13	3580.56
WP-14	3581.81
WP-15	3582.27
WP-16	3575.83
WP-17	3579.34
WP-18	3579.24



LEGEND

- SB-7 ⊙ - SOIL BORING LOCATION
- WP-18 0.04 ■ - MONITORING WELL LOCATION, AND HYDROCARBON PRODUCT THICKNESS, FEET. OCTOBER 7, 2005
- WP-3 ⊠ - MONITORING WELL LOCATION CONVERTED TO CATHOTIC PROTECTION WELL

GRAPHIC SCALE IN FEET

0 250' 500'

Scale: 1" = 250'

FIGURE # 5

LEA COUNTY, NEW MEXICO

DYNEGY MIDSTREAM SERVICES L.P.

MONUMENT GAS PLANT

HYDROCARBON PRODUCT MAP
OCTOBER 7, 2005

DATE 10-26-05

NAME: SJA

FILE: 2-0108

Larson & Associates, inc.
Environmental Consultants

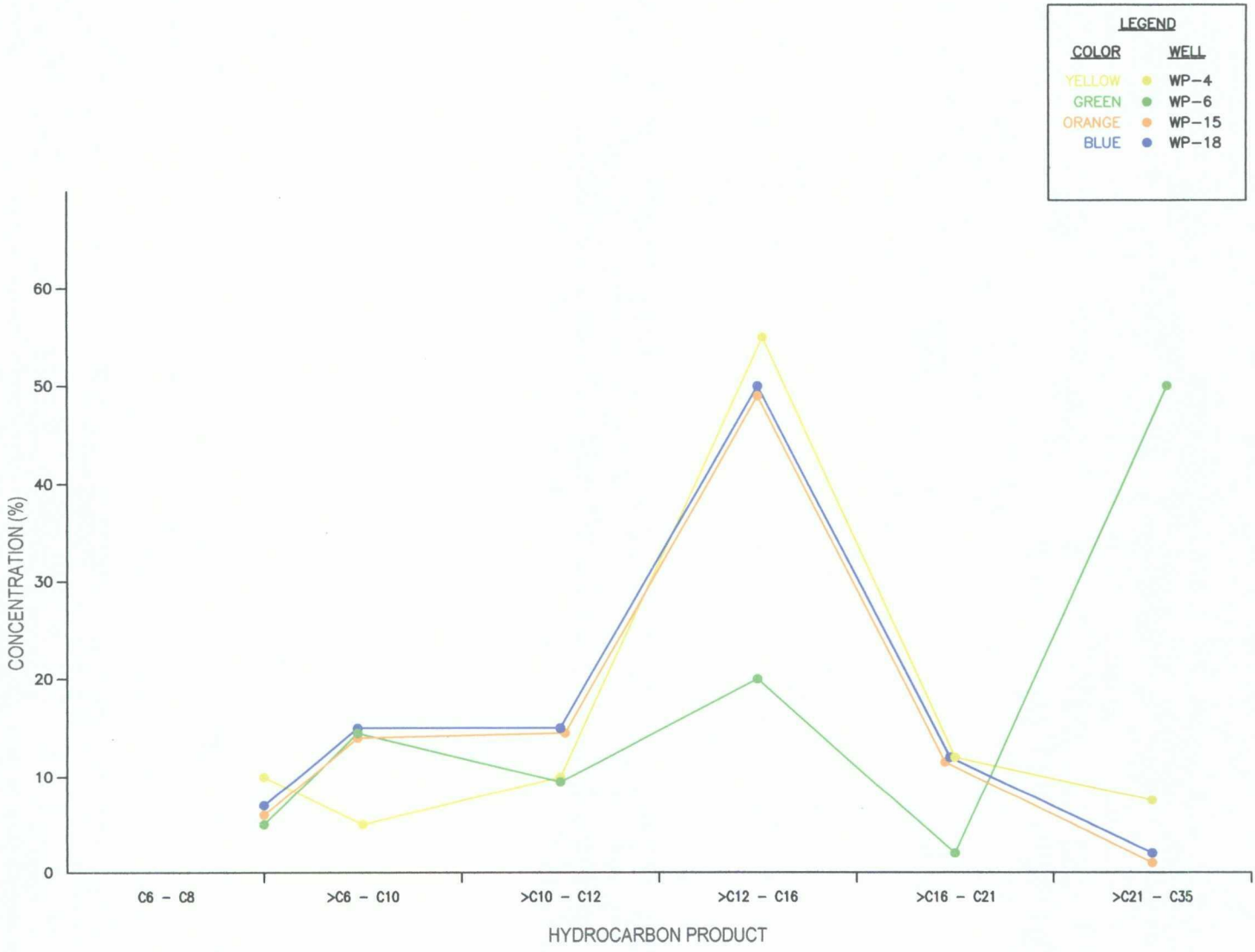


FIGURE # 6

LEA COUNTY, NEW MEXICO

DYNEGY MIDSTREAM SERVICES L.P.

MONUMENT GAS PLANT

HYDROCARBON PRODUCT CONCENTRATION CONTROL CHART
WP-4, WP-6, WP-15, WP-18

DATE 10-26-05

NAME: SJA

FILE: 2-0108

Larson & Associates, inc.
Environmental Consultants

Appendices

Appendix A

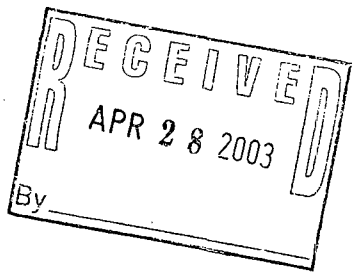
Correspondence

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

April 24, 2003



Mr. Cal Wrangham
Dynegy Midstream Services, L.P.
6 Desta Drive, Suite 3300
Midland, Texas 77705

RE: GROUND WATER REMEDIATION
MONUMENT GAS PLANT (GW-25)

Dear Mr. Wrangham:

The New Mexico Oil Conservation Division has reviewed Dynegy Midstream Services, L.P. (Dynegy) March 18, 2003 "ANNUAL GROUNDWATER MONITORING REPORT, DYNEGY MIDSTREAM SERVICES, L.P., MONUMENT GAS PLANT, (GW-25), SE/4, SW/4 SECTION 36, TOWNSHIP 19 SOUTH, RANGE 36, EAST, LEA COUNTY, NEW MEXICO" which was submitted on behalf of Dynegy by their consultant Larson & Associates, Inc. This document contains the results of Dynegy's 2002 ground water monitoring activities at Dynegy's Monument Gas Plant in Monument, New Mexico.

A review of the above-referenced document shows that there is no downgradient and lateral control on the extent of hydrocarbon contamination of ground water south and east of the gas plant. The furthest downgradient and lateral ground water monitoring wells in these areas contain phase-separated hydrocarbons. Therefore, the OCD requires that Dynegy submit a work plan to complete the definition of the extent of hydrocarbon contamination of ground water at the site. Please submit the work plan to the OCD Santa Fe Office by June 24, 2003 with a copy provided to the OCD Hobbs District Office.

If you have any questions, please contact me at (505) 827-7154.

Sincerely,

William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office
Cindy K. Crain, Larson & Associates, Inc.

Dynegy Midstream Services, Limited Partnership
1000 Louisiana Street, Suite 5800
Houston, Texas 77002
Phone 713.507.6400
www.dynegy.com

June 27, 2003

VIA UPS OVERNIGHT DELIVERY

DYNEGY

Mr. William C. Olson
Senior Hydrologist
New Mexico Oil Conservation Division
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Work Plan for Monitoring Well Installations, Dynegy Midstream Services, L.P., Monument Gas Plant (GW-025), UL N (SE/4, SW/4), Section 36, Township 19 South, Range 36 East, Lea County, New Mexico

Dear Mr. Olson,

Dynegy Midstream Services, L.P. (Dynegy) is submitting this work plan per your request to investigate the extent of phase-separated hydrocarbons in groundwater at the subject gas processing plant. After it's review of the annual groundwater monitoring report, the New Mexico Oil Conservation Division (NMOCD) requested a work plan on April 24, 2003, to further delineate phase-separated hydrocarbons (PSH) beyond existing monitoring wells located on the east and southeast sides of the plant property. As discussed during our meeting during May 2003, Dynegy is committed to recovering PSH from the groundwater at wells WP-4 and WP-15, and has recently purchased two new pneumatic skimmer pumps (GeoTech Model PRS). The pumps will be installed at wells WP-4 and WP-15, and will be equipped with automatic controls and a tank level switch. The pumps will discharge into 55-gallon drums equipped with automatic level switch and secondary containment. The recovered PSH will be placed in the condensate storage tanks at the plant.

Dynegy proposes to install three (3) monitoring wells east and southeast of the existing wells to determine the extent of the PSH in groundwater. The wells will be drilled approximately fifteen (15) feet into the upper groundwater-bearing unit using air rotary drilling rig or equivalent drilling equipment. Groundwater is estimated to occur from approximately 23 to 39 feet below ground surface (bgs), therefore, the wells will be advanced from approximately 38 to 54 feet bgs. The wells will be constructed using 2-inch diameter schedule 40 PVC screw-threaded casing and screen. The well screen, approximately twenty (20) feet in length, will extend to about fifteen (15) feet below groundwater and five (5) feet above groundwater.

Before final completion of the wells, the wells will be bailed or pumped with an electric submersible pump to remove fine-grained sediment and will be gauged to detect the presence of PSH. If PSH is detected in the well, the well will be completed as described below. If no PSH is found in the well, a groundwater sample will be collected as described below, then the well screen will be pulled and the hole plugged with bentonite chips and grout.

For wells containing PSH, the well screen will be surrounded with graded silica sand to about two (2) feet above the screen. A layer of bentonite chips, approximately three (3) feet thick, will be placed above the sand, and hydrated with potable water. The remainder of the boring will be filled with cement grout to about one (1) foot bgs. Each well will be secured with a locking cover anchored in concrete. The top-of-casing and ground elevation will be surveyed for elevation and location by a professional land surveyor licensed in the State of New Mexico. Drill cuttings will be placed on the ground adjacent to the wells.

All wells will be gauged for depth-to-groundwater. The developed or purged water will be contained in a portable tank, and discharged to the process water disposal system located at the plant. Groundwater samples will be collected from all wells where PSH is not present. Samples will be collected using dedicated disposable polyethylene bailers and will be carefully transferred to laboratory-preserved containers. The containers will be sealed, labeled, chilled in an ice chest, delivered under chain-of-custody control to the environmental laboratory, and analyzed for BTEX using method SW-846-8021B.

Results of the investigation will be submitted to the NMOCD as soon as possible but no later than six (6) weeks after the sampling is completed. I anticipate discussing this work plan with you in mid July at your convenience, with the work scheduled to begin shortly after your approval. Please give me a call if you have any questions or need further information.

Sincerely,
Dynegy Midstream Services, L.P.

J.D. Morris, P.E.
jd.morris@dynegy.com
713-507-6752

cc: Cal Wrangham
David Harris
James Lingnau
Chris Williams – NMOCD District 1

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

September 10, 2003

Mr. J.D. Morris
Dynegy Midstream Services, L.P.
1000 Louisiana St., Suite 5800
Houston, Texas 77002

RE: GROUND WATER REMEDIATION
MONUMENT GAS PLANT (GW-25)
MONUMENT, NEW MEXICO

Dear Mr. Morris:

The New Mexico Oil Conservation Division (OCD) has reviewed Dynegy Midstream Services, L.P.'s (Dynegy) June 27, 2003 "WORK PLAN FOR MONITORING WELL INSTALLATIONS, DYNEGY MIDSTREAM SERVICES, L.P., MONUMENT GAS PLANT (GW-025), (SE/4, SW/4), SECTION 36, TOWNSHIP 19 SOUTH, RANGE 37 EAST, LEA COUNTY, NEW MEXICO". This document contains Dynegy's work plan for installation of additional monitoring wells to determine downgradient and lateral extent of ground water contamination related to the Monument Gas Plant west of Monument, New Mexico.

The above-referenced work plan is approved with the following conditions:

1. Each borehole shall be completed as a ground water monitoring well regardless of the presence of phase-separated hydrocarbons on ground water.

2. The cement grout used to complete the monitor wells shall contain 3-5% bentonite.

3. Each monitor well shall be developed after construction using EPA approved procedures

4. No less than 24 hours after the wells are developed, ground water from all monitor wells which do not contain free phase products shall be purged, sampled and analyzed for concentrations of BTEX.

5. All soil and water samples shall be obtained and analyzed using EPA approved methods and quality assurance/quality control (QA/QC) procedures.

6. All wastes generated shall be disposed of at an OCD approved facility.

7. Dynegy shall submit a report containing the investigation results to the OCD Santa Fe Office by November 10, 2003 with a copy provided to the OCD Hobbs District Office. The report shall include:

   a. A description of all past and present investigation activities which have occurred including conclusions and recommendations.

   b. A geologic log and well completion diagram for each monitor well.

   c. A water table potentiometric map showing the location of monitor wells, boreholes, pipelines, pits and any other pertinent site features, as well as the direction and magnitude of the hydraulic gradient.

   d. A product thickness map based upon the thickness of measured free product in each facility monitoring well.

   e. Summary tables of all soil and ground water quality sampling results including copies of all laboratory analytical data sheets and associated QA/QC data.

   f. The disposition of all wastes generated.

8. Dynegy shall notify the OCD at least 1 week in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Please be advised that OCD approval does not limit Dynegy to the proposed work plan should the investigation actions fail to adequately define the extent of contamination related to Dynegy's activities, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve Dynegy of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions, please contact me at (505) 476-3491.

Sincerely,

William C. Olson
Hydrologist
Environmental Bureau

cc: Chris Williams, OCD Hobbs District Supervisor

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

September 10, 2003

Mr. J.D. Morris
Dynegy Midstream Services, L.P.
1000 Louisiana St., Suite 5800
Houston, Texas 77002

RE: GROUND WATER REMEDIATION
MONUMENT GAS PLANT (GW-25)
MONUMENT, NEW MEXICO

Dear Mr. Morris:

The New Mexico Oil Conservation Division (OCD) has reviewed Dynegy Midstream Services, L.P.'s (Dynegy) January 21, 2004 "REQUEST FOR EXTENSION FOR GROUNDWATER INVESTIGATION, DYNEGY MIDSTREAM SERVICES, L.P., MONUMENT GAS PLANT (GW-025), UNIT LETTER N, SECTION 36, TOWNSHIP 19 SOUTH, RANGE 37 EAST, LEA COUNTY, NEW MEXICO" which was submitted by Dynegy's consultant Larson & Associates, Inc. This document contains Dynegy's request for an extension of the deadline to submit a final report based upon Dynegy's previously submitted June 27, 2003 work plan which was approved by the OCD on September 10, 2003.

The request to submit a final report by June 30, 2004 on the work plan for installation of additional monitoring wells to determine downgradient and lateral extent of ground water contamination related to the Monument Gas Plant is approved.

If you have any questions, please contact me at (505) 476-3491.

Sincerely,

William C. Olson
Hydrologist
Environmental Bureau

cc: Chris Williams, OCD Hobbs District Supervisor

Mark Larson

From: Price, Wayne [WPrice@state.nm.us]
Sent: Wednesday, May 18, 2005 2:09 PM
To: Cal Wrangham (E-mail); Mark Larson (E-mail)
Cc: Sheeley, Paul; Johnson, Larry; Anderson, Roger
Subject: Dynegy Monument Gas Plant GW-025 Groundwater report

Dear Mr. Wrangham and Larson:

During the technical meeting held on May 17, 2005 Dynegy submitted the annual 2004 groundwater report for the above referenced site. During the meeting OCD indicated that due to the extreme groundwater rise (6-8 feet) in level over the past year Dynegy will be required to obtain a down gradient monitoring point from the site. The discussion centered on a point down gradient of WP-4 and WP-4R. In addition, OCD will require one monitoring point down gradient from WP-12 and WP-14.

Please submit for OCD approval a plan to address this issue by June 15, 2005.

Sincerely:

Wayne Price
New Mexico Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505
505-476-3487
fax: 505-476-3462
E-mail: WPRICE@state.nm.us
bmitted

Mark Larson

From: Mark Larson [mark@laenvironmental.com]
Sent: Wednesday, June 15, 2005 8:38 PM
To: Price, Wayne
Cc: Cal.Wrangham@Dyneegy.com; JD.Morris@Dynegy.com; RAnderson@state.nm.us; LJohnson@state.nm.us; PSheeley@state.nm.us
Subject: RE: Dynegy Monument Gas Plant GW-025, Work Plan for Well Installation

NMOCD
espondence, June 1

Dear Mr. Price,

This submittal is in response to your request for a work plan to install monitoring wells at the Dynegy Midstream Services, L.P. (Dynegy), Monument Gas Plant (G-025), located in Lea County, New Mexico. As discussed during our telephone conversation on June 13, 2005, Dynegy submitted a work plan to the New Mexico Oil Conservation Division (NMOCD) on June 27, 2003, at the request of Mr. Bill Olson (April 24, 2003). The work plan proposed three (3) monitoring wells, and was approved by the NMOCD on September 10, 2003. Mr. Olson approved a request for extension until June 30, 2004, in order for Dynegy to conduct further product recovery and source identification. The NMOCD was briefed of the findings of the product recovery and source identification efforts during the technical meeting on May 17, 2005. Dynegy requests that the NMOCD accept its work plan dated June 27, 2003, and approval with conditions dated September 10, 2003? Copies of the above-referenced correspondence, as well as a drawing showing the approximate locations for the proposed wells is attached. Please contact Mr. Wrangham or myself if you have questions.
Sincerely,

Mark J. Larson
Senior Hydrogeologist/President
Larson and Associates, Inc.
507 N. Marienfeld Street, Suite 202
Midland, Texas 79701
(432) 687-0901 (Office)
(432) 687-0456 (Fax)
(432) 556-8656 (Cell)
Mark@LAEnvironmental.com

-----Original Message-----
From: Price, Wayne [mailto:WPrice@state.nm.us]
Sent: Wednesday, May 18, 2005 2:09 PM
To: Cal Wrangham (E-mail); Mark Larson (E-mail)
Cc: Sheeley, Paul; Johnson, Larry; Anderson, Roger
Subject: Dynegy Monument Gas Plant GW-025 Groundwater report

Dear Mr. Wrangham and Larson:

During the technical meeting held on May 17, 2005 Dynegy submitted the annual 2004 groundwater report for the above referenced site. During the meeting OCD indicated that due to the extreme groundwater rise (6-8 feet) in level over the past year Dynegy will be required to obtain a down gradient monitoring point from the site. The discussion centered on a point down gradient of WP-4 and WP-4R. In addition, OCD will require one monitoring point down gradient from WP-12 and WP-14.

Please submit for OCD approval a plan to address this issue by June 15, 2005.

Mark Larson

From: Price, Wayne, EMNRD [wayne.price@state.nm.us]
Sent: Thursday, June 16, 2005 9:08 AM
To: Mark Larson
Cc: Cal.Wrangham@Dyneegy.com; JD.Morris@Dynegy.com; RAnderson@state.nm.us; LJohnson@state.nm.us; Sheeley, Paul, EMNRD
Subject: RE: Dynegy Monument Gas Plant GW-025, Work Plan for Well Installation

OCD hereby approves of your request.

From: Mark Larson [mailto:mark@laenvironmental.com]
Sent: Wed 6/15/2005 7:38 PM
To: Price, Wayne, EMNRD
Cc: Cal.Wrangham@Dyneegy.com; JD.Morris@Dynegy.com; RAnderson@state.nm.us; LJohnson@state.nm.us; Sheeley, Paul, EMNRD
Subject: RE: Dynegy Monument Gas Plant GW-025, Work Plan for Well Installation

Dear Mr. Price,
This submittal is in response to your request for a work plan to install monitoring wells at the Dynegy Midstream Services, L.P. (Dynegy), Monument Gas Plant (G-025), located in Lea County, New Mexico. As discussed during our telephone conversation on June 13, 2005, Dynegy submitted a work plan to the New Mexico Oil Conservation Division (NMOCD) on June 27, 2003, at the request of Mr. Bill Olson (April 24, 2003). The work plan proposed three (3) monitoring wells, and was approved by the NMOCD on September 10, 2003. Mr. Olson approved a request for extension until June 30, 2004, in order for Dynegy to conduct further product recovery and source identification. The NMOCD was briefed of the findings of the product recovery and source identification efforts during the technical meeting on May 17, 2005. Dynegy requests that the NMOCD accept its work plan dated June 27, 2003, and approval with conditions dated September 10, 2003? Copies of the above-referenced correspondence, as well as a drawing showing the approximate locations for the proposed wells is attached. Please contact Mr. Wrangham or myself if you have questions.
Sincerely,

Mark J. Larson
Senior Hydrogeologist/President
Larson and Associates, Inc.
507 N. Marienfeld Street, Suite 202
Midland, Texas 79701
(432) 687-0901 (Office)
(432) 687-0456 (Fax)
(432) 556-8656 (Cell)
Mark@LAEnvironmental.com

-----Original Message-----
From: Price, Wayne [mailto:WPrice@state.nm.us]
Sent: Wednesday, May 18, 2005 2:09 PM
To: Cal Wrangham (E-mail); Mark Larson (E-mail)
Cc: Sheeley, Paul; Johnson, Larry; Anderson, Roger
Subject: Dynegy Monument Gas Plant GW-025 Groundwater report

Dear Mr. Wrangham and Larson:

During the technical meeting held on May 17, 2005 Dynegy submitted the annual 2004 groundwater report for the above referenced site. During the meeting OCD indicated that due to the extreme groundwater rise (6-8 feet) in level over the past year Dynegy will be required to obtain a down gradient monitoring point from the site. The discussion centered on a point down gradient of WP-4 and WP-4R. In addition, OCD will require one monitoring point down gradient from WP-12 and WP-14.

Please submit for OCD approval a plan to address this issue by June 15, 2005.

Sincerely:

Wayne Price
New Mexico Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505
505-476-3487
fax: 505-476-3462
E-mail: WPRICE@state.nm.us
bmitted

Mark Larson

From: Price, Wayne, EMNRD [wayne.price@state.nm.us]
Sent: Thursday, June 30, 2005 9:22 AM
To: Mark Larson
Cc: Cal.Wrangham@Dyneegy.com; JD.Morris@Dynegy.com; RAnderson@state.nm.us; LJohnson@state.nm.us; Sheeley, Paul, EMNRD
Subject: RE: Dynegy Monument Gas Plant GW-025, Work Plan for Well Installation

APPROVED!!

From: Mark Larson [mailto:mark@laenvironmental.com]
Sent: Wed 6/15/2005 7:38 PM
To: Price, Wayne, EMNRD
Cc: Cal.Wrangham@Dyneegy.com; JD.Morris@Dynegy.com; RAnderson@state.nm.us; LJohnson@state.nm.us; Sheeley, Paul, EMNRD
Subject: RE: Dynegy Monument Gas Plant GW-025, Work Plan for Well Installation

Dear Mr. Price,
This submittal is in response to your request for a work plan to install monitoring wells at the Dynegy Midstream Services, L.P. (Dynegy), Monument Gas Plant (G-025), located in Lea County, New Mexico. As discussed during our telephone conversation on June 13, 2005, Dynegy submitted a work plan to the New Mexico Oil Conservation Division (NMOCD) on June 27, 2003, at the request of Mr. Bill Olson (April 24, 2003). The work plan proposed three (3) monitoring wells, and was approved by the NMOCD on September 10, 2003. Mr. Olson approved a request for extension until June 30, 2004, in order for Dynegy to conduct further product recovery and source identification. The NMOCD was briefed of the findings of the product recovery and source identification efforts during the technical meeting on May 17, 2005. Dynegy requests that the NMOCD accept its work plan dated June 27, 2003, and approval with conditions dated September 10, 2003? Copies of the above-referenced correspondence, as well as a drawing showing the approximate locations for the proposed wells is attached. Please contact Mr. Wrangham or myself if you have questions.
Sincerely,

Mark J. Larson
Senior Hydrogeologist/President
Larson and Associates, Inc.
507 N. Marienfeld Street, Suite 202
Midland, Texas 79701
(432) 687-0901 (Office)
(432) 687-0456 (Fax)
(432) 556-8656 (Cell)
Mark@LAEnvironmental.com

-----Original Message-----
From: Price, Wayne [mailto:WPrice@state.nm.us]
Sent: Wednesday, May 18, 2005 2:09 PM
To: Cal Wrangham (E-mail); Mark Larson (E-mail)
Cc: Sheeley, Paul; Johnson, Larry; Anderson, Roger
Subject: Dynegy Monument Gas Plant GW-025 Groundwater report

Dear Mr. Wrangham and Larson:

During the technical meeting held on May 17, 2005 Dynegy submitted the annual 2004 groundwater report for the above referenced site. During the meeting OCD indicated that due to the extreme groundwater rise (6-8 feet) in level over the past year Dynegy will be required to obtain a down gradient monitoring point from the site. The discussion centered on a point down gradient of WP-4 and WP-4R. In addition, OCD will require one monitoring point down gradient from WP-12 and WP-14.

Please submit for OCD approval a plan to address this issue by June 15, 2005.

Sincerely:

Wayne Price
New Mexico Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505
505-476-3487
fax: 505-476-3462
E-mail: WPRICE@state.nm.us
bmitted

Appendix B

Boring Logs and Well Records

Client: Dynegy Midstream Services, L.P.

Project: Monument Gas Plant

Project No.: 3-0106

Location: Lea County, New Mexico

Log: WP-4R

Geologist: C. Crain

SUBSURFACE PROFILE				SAMPLE			PID Measurement (PPM) 50 100 150	Well Detail	Notes
Depth	Description	Symbol	Ground Elevation	Number	Type	Recovery			
0	***Caliche*** 7.5 YR 8/3, Pinkish white quartz sand, very fine grained, very poorly sorted, dry								Well finished with locking above grade cover
5									0.00' - 14.00' BGS Cement - bentonite grout
10									0.00' - 14.00' BGS 4" Sch. 40 PVC threaded riser
			3564						
15	***Silty Sand*** 5 YR 6/6, pinkish orange quartz sand, very fine grained, poorly sorted, sorted, loose, dry								14.00' - 18.00' BGS Bentonite pellets
	Damp @ 23.0'								
20	Hydrocarbon odor 28.0' - 40.0'								16.00' - 38.00' BGS 10-20 Silica sand
	Staining 28.0' - 38.0'								
25									18.00' - 38.00' BGS 4" Sch. 40 PVC threaded screen 0.010" slots
30									30.79' BGS Water Level, 10/07/05
35			3540						
	Red, Silty Clay Very fine grained, very poorly sorted, damp		3538						38.00' BGS 4" Sch. 40 PVC threaded cap
40	***TD: 38'***								
45									

Drilled By: Scarborough Drilling

Drill Method: Air Rotary

Drill Date: 12/16/03

Larson and Associates Inc.
507 N. Marienfeld, Suite 202
Midland, Texas 79701
(432) 687-0901

Well Size: 4"

TOC Elevation: 3578.35'

Checked By: CC

Client: Dynegy Midstream Services, L.P.

Project: Monument Gas Plant

Project No.: 3-0106

Location: Lea County, New Mexico

Log: WP-16

Geologist: C. Crain

Depth	Description	Symbol	Ground Elevation	Sample Number	Sample Type	Sample Recovery	PID Measurement (PPM) 5 10 15	Well Detail	Notes
0	***Caliche*** 7.5 YR 8/2, Pinkish white quartz sand, indurated, damp								Well finished with locking above grade cover 0.00' - 15.00' BGS Cement - bentonite grout
5									
10									0.00' - 18.49' BGS 2" Sch. 40 PVC threaded riser
15									15.00' - 17.00' BGS *Bentonite pellets*
20			3551						18.49' - 38.49' BGS 2" Sch. 40 PVC threaded screen 0.010" slots
25	***Sand*** 5 YR 6/6, Reddish yellow quartz sand, poorly sorted, fine grained, damp								17.00' - 39.00' BGS 10-20 Silica sand
30									32.02' BGS Water Level, 10/07/05
35			3536						
40	***Redbed (Clay)*** 10 R 4/4, weak red ***TD: 40'***		3534						39.00' BGS 2" Sch. 40 PVC threaded cap
45									

Drilled By: Scarborough Drilling

Drill Method: Air Rotary

Drill Date: 8/4/05

Larson and Associates Inc.
507 N. Marienfeld, Suite 202
Midland, Texas 79701
(432) 687-0901

Well Size: 2"

TOC Elevation: 3575.83'

Checked By: CC

Client: Dynegy Midstream Services, L.P.

Project: Monument Gas Plant

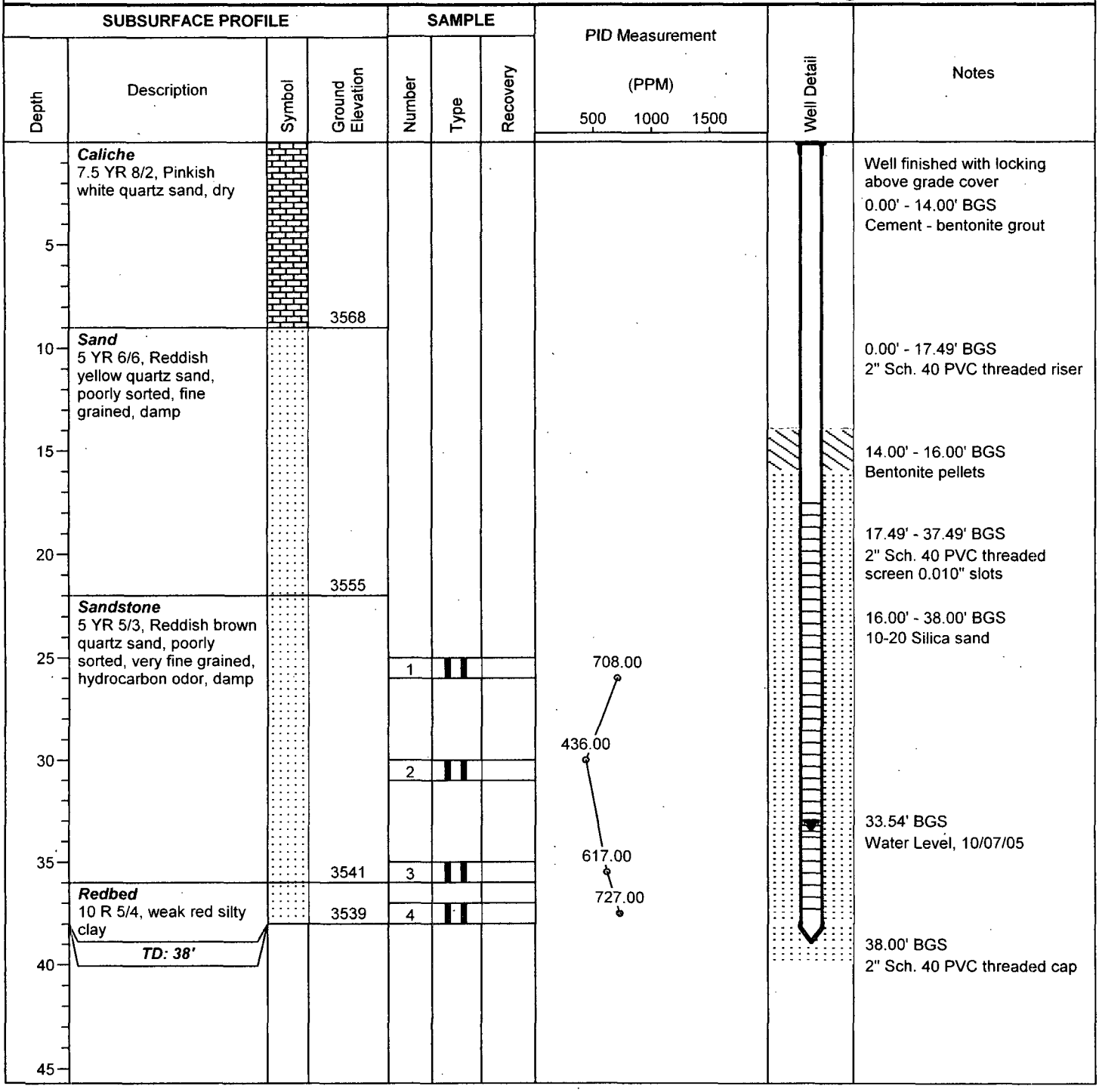
Project No.: 3-0106

Location: Lea County, New Mexico

Log: WP-17

Geologist: C. Crain

Page: 1 of 1



Drilled By: Scarborough Drilling

Drill Method: Air Rotary

Drill Date: 8/4/05

Larson and Associates Inc.
507 N. Marienfeld, Suite 202
Midland, Texas 79701
(432) 687-0901

Well Size: 2"

TOC Elevation: 3579.34'

Checked By: CC

Client: Dynegy Midstream Services, L.P.

Project: Monument Gas Plant

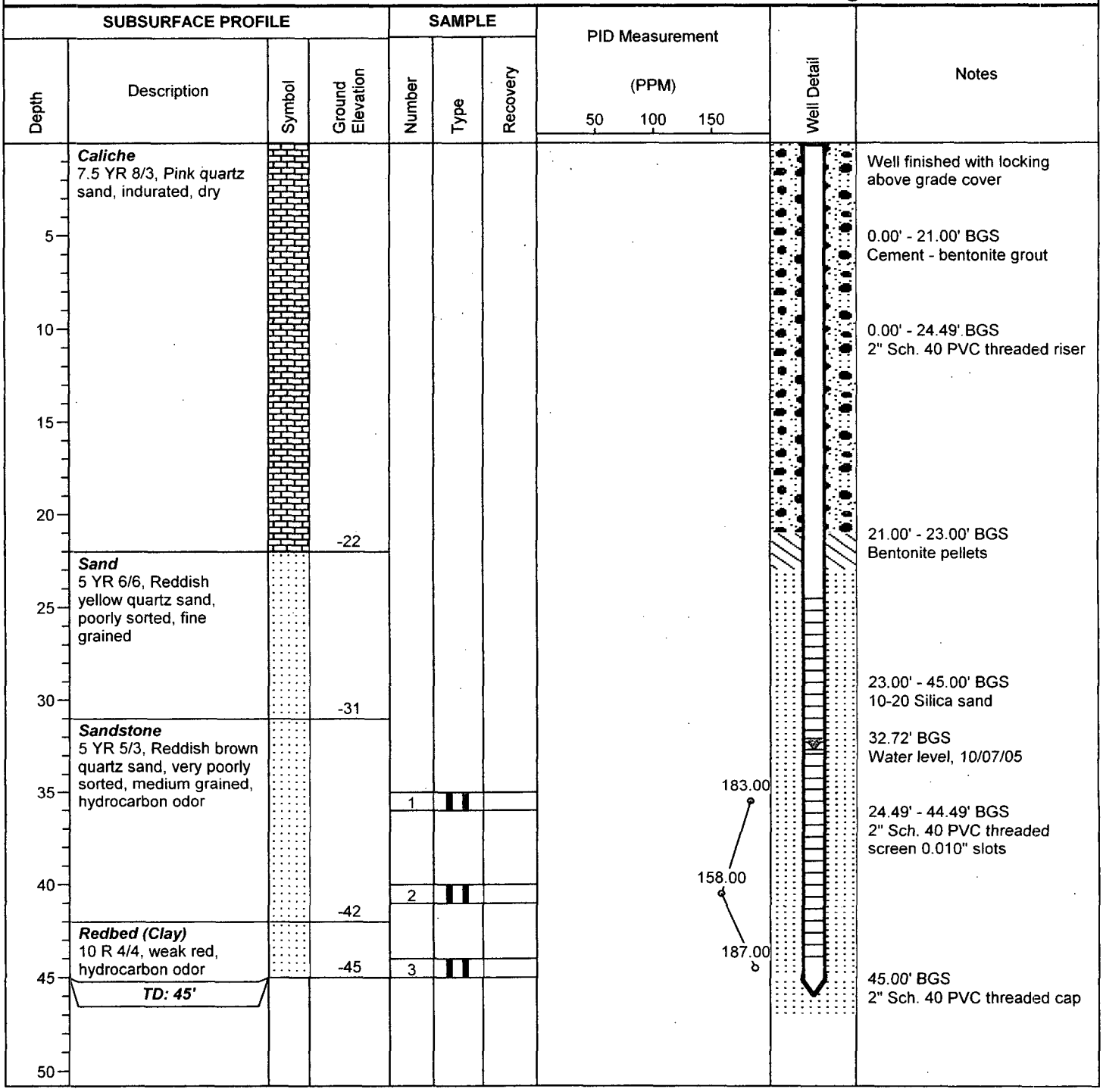
Project No.: 3-0106

Location: Lea County, New Mexico

Log: MW-18

Geologist: C. Crain

Page: 1 of 1



Drilled By: Scarborough Drilling

Drill Method: Air Rotary

Drill Date: 8/4/05

Larson and Associates Inc.
507 N. Marienfeld, Suite 202
Midland, Texas 79701
(432) 687-0901

Well Size: 2"

TOC Elevation: N/A

Checked By: CC

Appendix C

Laboratory Reports

ANALYTICAL REPORT

Prepared for:

Ray Jones
LARSON AND ASSOCIATES, INC.
P.O. BOX 50685
MIDLAND, TX 79710

Project:	Dynegy monument Plant
PO#:	
Order#:	G0306644
Report Date:	06/10/2003

Certificates
US EPA Laboratory Code TX00158

ENVIRONMENTAL LAB OF TEXAS

SAMPLE WORK LIST

LARSON AND ASSOCIATES, INC.
P.O. BOX 50685
MIDLAND, TX 79710
915-687-0456

Order#: G0306644
Project: 2-0108
Project Name: Dynegy monument Plant
Location: None Given

The samples listed below were submitted to Environmental Lab of Texas and were received under chain of custody. Environmental Lab of Texas makes no representation or certification as to the method of sample collection, sample identification, or transportation/handling procedures used prior to the receipt of samples by Environmental Lab of Texas, unless otherwise noted.

Lab ID:	Sample :	Matrix:	Date / Time Collected	Date / Time Received	Container	Preservative
0306644-01	WP-15	LIQUID	6/4/03 11:00	6/5/03 7:50	40 mL voa	Ice
	Lab Testing: Fingerprint by GC/FID	**Rejected:** No		**Temp:** 4.0 C		
0306644-02	WP-6	LIQUID	6/4/03 14:00	6/5/03 7:50	40 mL voa	Ice
	Lab Testing: Fingerprint by GC/FID	**Rejected:** No		**Temp:** 4.0 C		
0306644-03	WP-4	WATER	6/4/03 14:15	6/5/03 7:50	40 mL voa	Ice
	Lab Testing: Fingerprint by GC/FID	**Rejected:** No		**Temp:** 4.0 C		

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Ray Jones
LARSON AND ASSOCIATES, INC.
P.O. BOX 50685
MIDLAND, TX 79710

Order#: G0306644
Project: 2-0108
Project Name: Dynegy monument Plant
Location: None Given

Lab ID: 0306644-01
Sample ID: WP-15

Fingerprint by GC/FID

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
		6/6/03	1	1	CK	GC/FID

Parameter	Result %	RL
C6-C8	4.42	1.00
C8-C10	15.8	1.00
C10-C12	15.9	1.00
C12-C16	51.2	1.00
C16-C21	11.1	1.00
C21-C35	1.50	1.00

Lab ID: 0306644-02
Sample ID: WP-6

Fingerprint by GC/FID

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
		6/6/03	1	1	CK	GC/FID

Parameter	Result %	RL
C6-C8	4.28	1.00
C8-C10	15.6	1.00
C10-C12	11.1	1.00
C12-C16	20.2	1.00
C16-C21	1.63	1.00
C21-C35	47.2	1.00

N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Ray Jones
LARSON AND ASSOCIATES, INC.
P.O. BOX 50685
MIDLAND, TX 79710

Order#: G0306644
Project: 2-0108
Project Name: Dynegy monument Plant
Location: None Given

Lab ID: 0306644-03
Sample ID: WP-4

Fingerprint by GC/FID

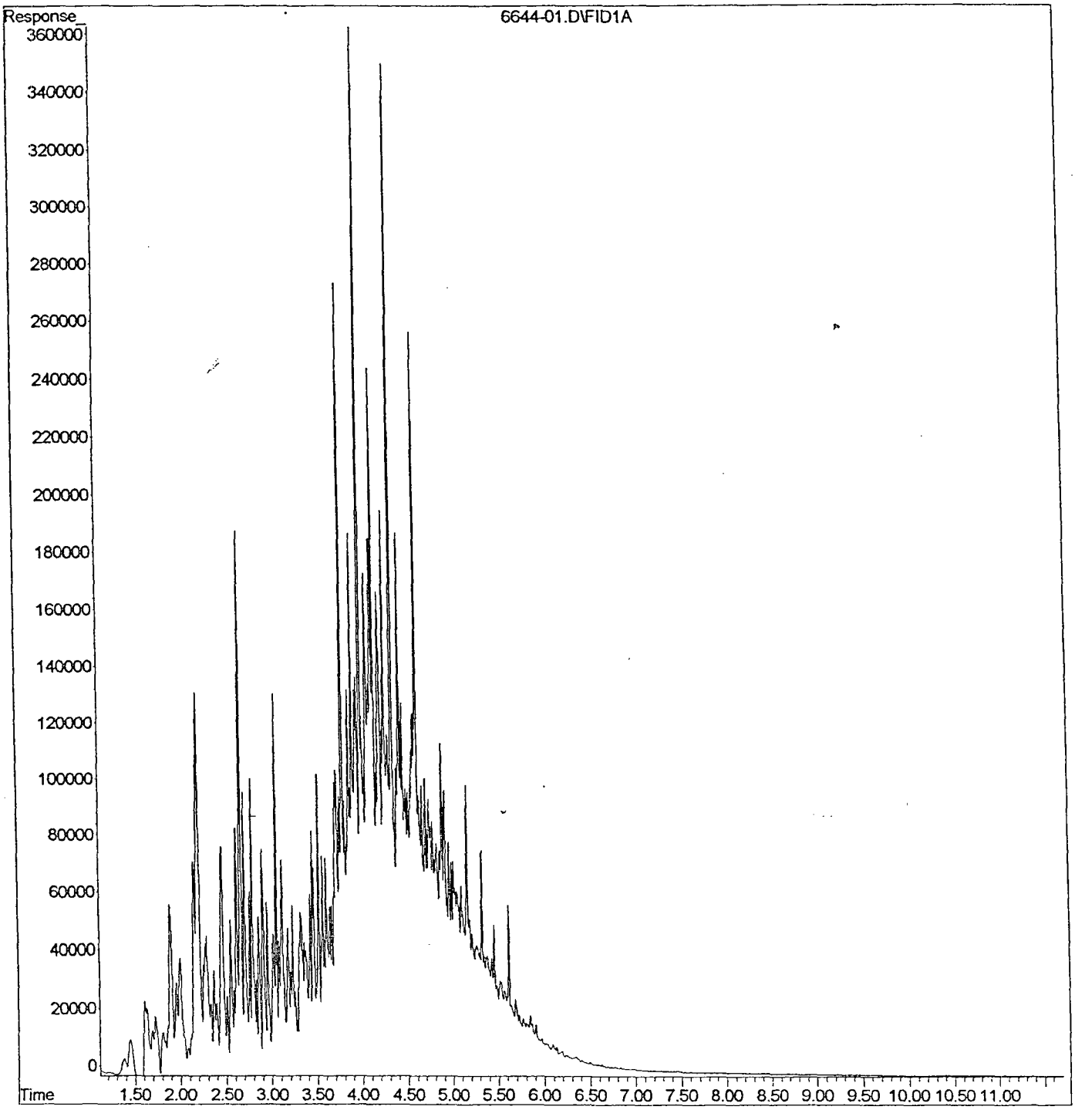
Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
		6/6/03	1	1	CK	GC/FID

Parameter	Result %	RL
C6-C8	**9.72**	1.00
C8-C10	**5.91**	1.00
C10-C12	**11.2**	1.00
C12-C16	**55.0**	1.00
C16-C21	**11.6**	1.00
C21-C35	**6.64**	1.00

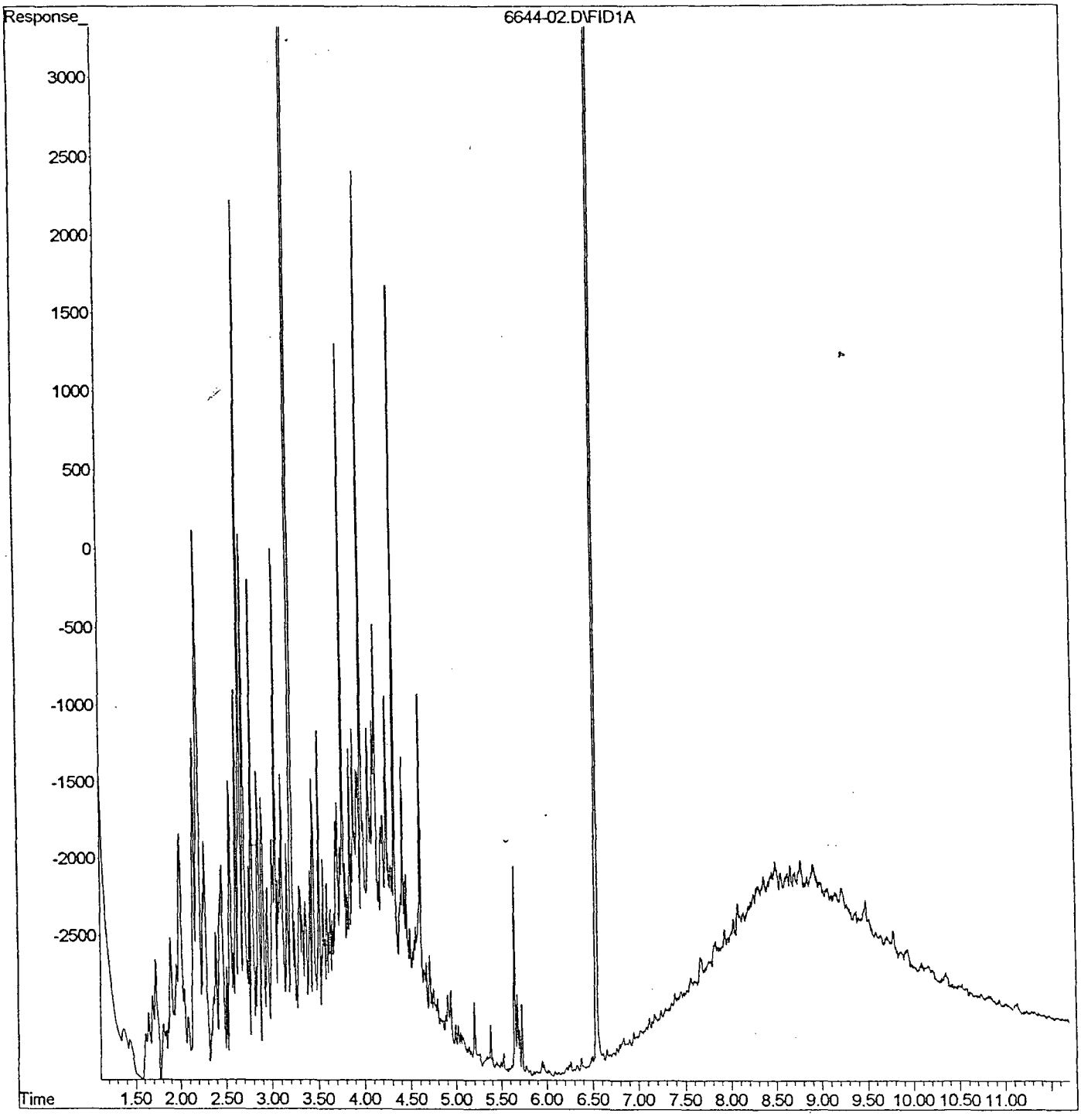
Approval: Raland K Tuttle 6-11-03
Raland K. Tuttle, Lab Director, QA Officer — Date
Celey D. Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Sandra Biezugbe, Lab Tech.
Sara Molina, Lab Tech.

N/A = Not Applicable RL = Reporting Limit

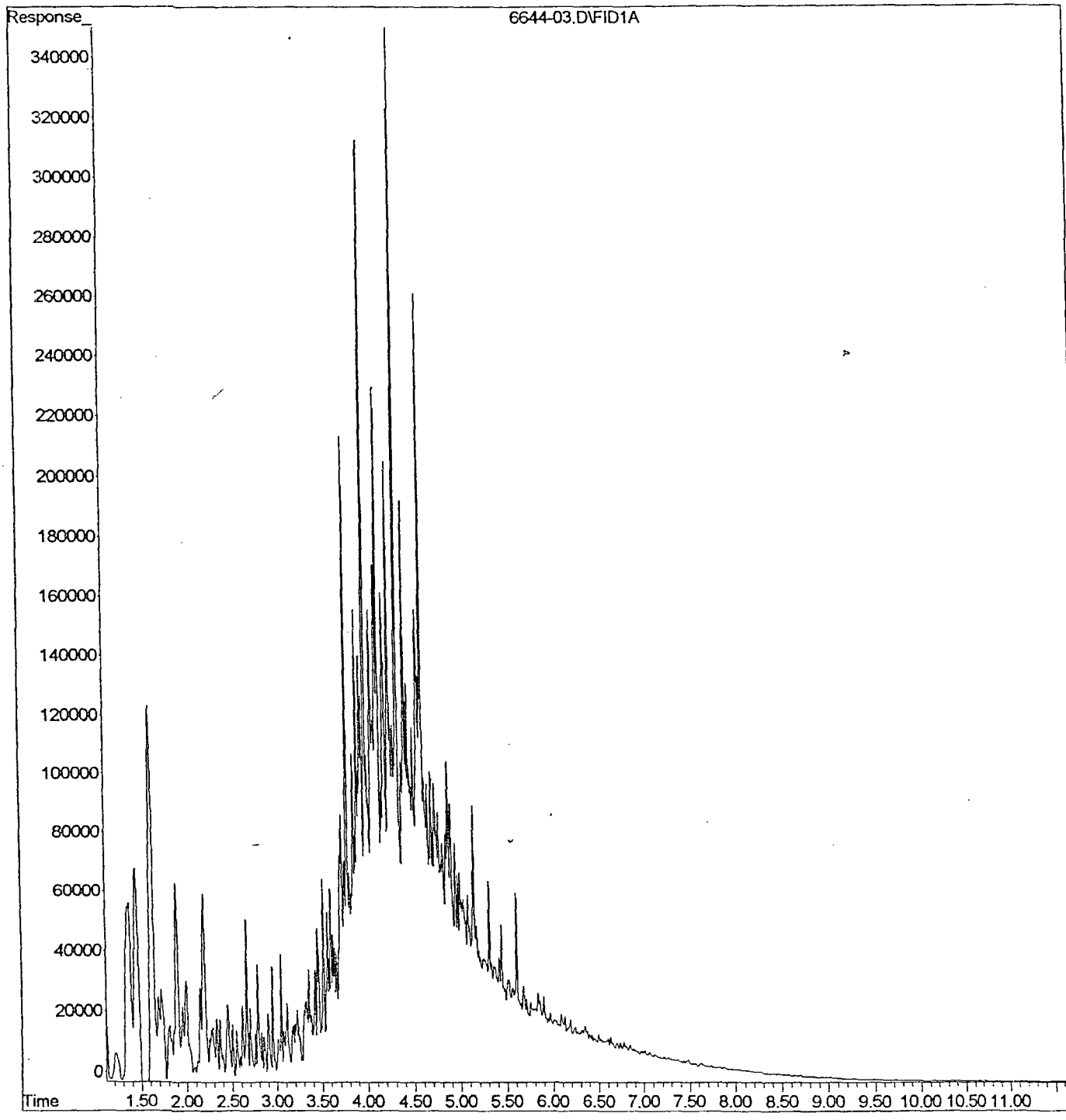
File : C:\HPCHEM\1\DATA\060503\6644-01.D
Operator : rt
Acquired : 6 Jun 2003 8:22 pm using AcqMethod 1005RTC.M
Instrument : GC/MS Ins
Sample Name:
Misc Info : fingerprint
Vial Number: 47



File : C:\HPCHEM\1\DATA\060503\6644-02.D
Operator : rt
Acquired : 6 Jun 2003 8:44 pm using AcqMethod 1005RTC.M
Instrument : GC/MS Ins
Sample Name:
Misc Info : fingerprint
Vial Number: 48



File : C:\HPCHEM\1\DATA\060503\6644-03.D
Operator : rt
Acquired : 6 Jun 2003 9:06 pm using AcqMethod 1005RTC.M
Instrument : GC/MS Ins
Sample Name:
Misc Info : fingerprint
Vial Number: 49



CHAIN—OF—CUSTODY RECORD

Larson & Associates, Inc.
Environmental Consultants
507 N. Marienfeld, Ste. 202 • Midland, TX 79701
Fax: 915-687-0456
915-687-0901

CLIENT NAME: Dynegy

SITE MANAGER: Kay Jones

PROJECT NO.: 2-0108

PROJECT NAME: Dynegy Monument Plant

PAGE 1 OF 1

LAB. PO #

PARAMETERS/METHOD NUMBER

	DATE	TIME	WATER	SOIL	OTHER	SAMPLE IDENTIFICATION	NUMBER OF CONTAINERS	GC fingerprint	LAB. I.D. NUMBER (LAB USE ONLY)	REMARKS (I.E., FILTERED, UNFILTERED, PRESERVED, UNPRESERVED, GRAB COMPOSITE)
01	6/4/03	11:00			✓	WP-15	2	✓	030644	
02	6/4/03	14:15	✓			~~WP-6~~ WP-6	2	✓		
03	6/4/03	14:00			✓	WP-4	2	✓		

SAMPLED BY: (Signature) Kay Jones DATE: 6/4/03 TIME: 1400

RELINQUISHED BY: (Signature) DATE: TIME:

RECEIVED BY: (Signature) DATE: TIME:

RELINQUISHED BY: (Signature) Kay Jones DATE: 6/5/03 TIME: 7:30

RECEIVED BY: (Signature) DATE: TIME:

SAMPLE SHIPPED BY: (Circle)
FEDEX BUS AIRBILL #:
HAND DELIVERED UPS OTHER:

COMMENTS:

TURNAROUND TIME NEEDED

WHITE – RECEIVING LAB
YELLOW – RECEIVING LAB (TO BE RETURNED TO LA AFTER RECEIPT)
PINK – PROJECT MANAGER
GOLD – QA/QC COORDINATOR

RECEIVING LABORATORY: ECOT

ADDRESS:

CITY: STATE: ZIP:

CONTACT: PHONE:

RECEIVED BY: (Signature)

DATE: 6-05-03 TIME: 0950

SAMPLE CONDITION WHEN RECEIVED: Rec 4°C.

LA CONTACT PERSON:

SAMPLE TYPE:

ENVIRONMENTAL LAB OF

12600 West I-20 East - Odessa, Texas 79765

Analytical Report

Prepared for:

Cindy Crain

Larson & Associates, Inc.

P.O. Box 50685

Midland, TX 79710

Project: Dynegy Monument G.P.

Project Number: 3-0106

Location: None Given

Lab Order Number: 4E14006

Report Date: 05/17/04

Larson & Associates, Inc.	Project: Dynegy Monument G.P.	(432) 687-0456
P.O. Box 50685	Project Number: 3-0106	Reported:
Larson & Associates, Inc.	Project Manager: Cindy Crain	05/17/04 13:49

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
WP-14	4E14006-01	Oil	05/13/04 15:51	05/14/04 08:58

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Larson & Associates, Inc.	Project: Dynegy Monument G.P.	(432) 687-0456
P.O. Box 50685	Project Number: 3-0106	**Reported:**
Larson & Associates, Inc.	Project Manager: Cindy Crain	05/17/04 13:49

Fingerprint by GC

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
WP-14 (4E14006-01)									
C6-C8	**4.14**	1.00	%	1	EE41701	05/17/04	05/17/04	GC FID	
>C8-C10	**13.0**	1.00	"	"	"	"	"	"	
>C10-C12	**16.3**	1.00	"	"	"	"	"	"	
>C12-C16	**49.0**	1.00	"	"	"	"	"	"	
>C16-C21	**15.4**	1.00	"	"	"	"	"	"	
>C21-C35	**2.16**	1.00	"	"	"	"	"	"	

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.

Quality Assurance Review

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

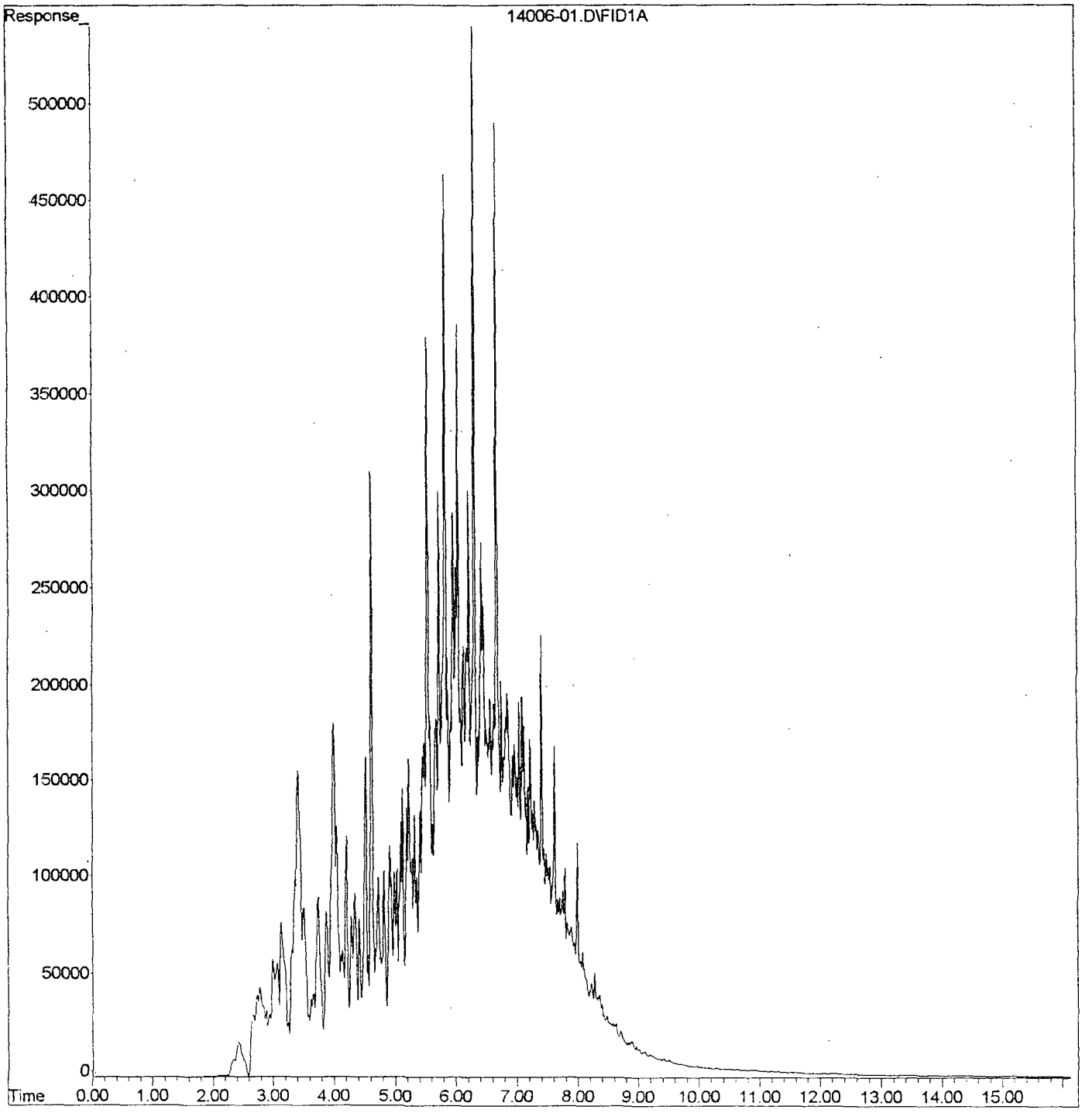
Notes and Definitions

DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
RPD	Relative Percent Difference

Quality Assurance Review

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

File : C:\HPCHEM\1\DATA\051704\14006-01.D
Operator : JLH
Acquired : 17 May 2004 11:11 am using AcqMethod DINJECT.M
Instrument : GC/MS Ins
Sample Name: 4E14006-01
Misc Info :
Vial Number: 6



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

Client: Larson + Associates

Date/Time: 05-14-04 @ 0930

Order #: 4E14006

Initials: JMM

Sample Receipt Checklist

Temperature of container/cooler?	(Yes)	No	6.0 C
Shipping container/cooler in good condition?	Yes	No	N/A
Custody Seals intact on shipping container/cooler?	Yes	No	(Not present)
Custody Seals intact on sample bottles?	Yes	No	(Not present)
Chain of custody present?	(Yes)	No	
Sample Instructions complete on Chain of Custody?	(Yes)	No	
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?	(Yes)	No	
Sample Matrix and properties same as on chain of custody?	(Yes)	No	
Samples in proper container/bottle?	(Yes)	No	
Samples properly preserved?	(Yes)	No	
Sample bottles intact?	(Yes)	No	
Preservations documented on Chain of Custody?	(Yes)	No	
Containers documented on Chain of Custody?	(Yes)	No	
Sufficient sample amount for indicated test?	(Yes)	No	
All samples received within sufficient hold time?	(Yes)	No	
VOC samples have zero headspace?	(Yes)	No	Not Applicable

Other observations:

_____

_____

_____

Variance Documentation:

Contact Person: - _____ Date/Time: _____ Contacted by: _____

Regarding:

_____

_____

_____

Corrective Action Taken:

_____

_____

_____

_____

_____

_____

_____

_____

CHAIN—OF—CUSTODY RECORD

Larson & Associates, Inc.
Environmental Consultants
Fax: 432-687-0456
432-687-0901
507 N. Marienfeld, Ste. 202 • Midland, TX 79701

CLIENT NAME: Dynegy

SITE MANAGER: Cindy Crain

PROJECT NO.: 3-0106

PROJECT NAME: Monument G.P.

PAGE 1 OF 1

LAB. PO #

DATE	TIME	WATER	SOIL	OTHER	SAMPLE IDENTIFICATION	NUMBER OF CONTAINERS 40mL glass	Finger Print								LAB. I.D. NUMBER (LAB USE ONLY)	REMARKS (I.E., FILTERED, UNFILTERED, PRESERVED, UNPRESERVED, GRAB COMPOSITE)
5/13	1551			✓	WP-14	2	✓								4E14006-01	

SAMPLED BY: (Signature) Ray Jones DATE: 5/13/04 TIME: 1559

RELINQUISHED BY: (Signature) Ray Jones DATE: 5/14/04 TIME: 0858

RECEIVED BY: (Signature) DATE: TIME:

RELINQUISHED BY: (Signature) DATE: TIME:

RECEIVED BY: (Signature) DATE: TIME:

SAMPLE SHIPPED BY: (Circle)
FEDEX BUS AIRBILL #:
HAND DELIVERED UPS OTHER:

COMMENTS:

TURNAROUND TIME NEEDED: Stand.

WHITE – RECEIVING LAB
YELLOW – RECEIVING LAB (TO BE RETURNED TO LA AFTER RECEIPT)
PINK – PROJECT MANAGER
GOLD – QA/QC COORDINATOR

RECEIVING LABORATORY: Env. Lab of TX
ADDRESS: 12600 W I-20 E
CITY: Odessa STATE: TX ZIP: 79765
CONTACT: PHONE:

RECEIVED BY: (Signature) Jeanne McMurrey
DATE: 5-14-4 TIME: 1559

SAMPLE CONDITION WHEN RECEIVED: 6.0°C

LA CONTACT PERSON: Cindy

SAMPLE TYPE:

ENVIRONMENTAL LAB OF

12600 West I-20 East - Odessa, Texas 79765

Analytical Report

Prepared for:

Cindy Crain

Larson & Associates, Inc.

P.O. Box 50685

Midland, TX 79710

Project: Dynegy Monument G.P.

Project Number: 2-0108

Location: None Given

Lab Order Number: 5H10003

Report Date: 08/18/05

Larson & Associates, Inc.	Project: Dynegy Monument G.P.	Fax: (432) 687-0456
P.O. Box 50685	Project Number: 2-0108	**Reported:**
Midland TX, 79710	Project Manager: Cindy Crain	08/18/05 10:15

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
WP 16	5H10003-01	Water	08/09/05 11:50	08/10/05 08:45
WP 17	5H10003-02	Water	08/09/05 14:09	08/10/05 08:45
WP 18	5H10003-03	Water	08/09/05 14:50	08/10/05 08:45

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
WP 16 (5H10003-01) Water									
Benzene	**0.00438**	0.00100	mg/L	1	EH51609	08/16/05	08/16/05	EPA 8021B	
Toluene	ND	0.00100	"	"	"	"	"	"	
Ethylbenzene	ND	0.00100	"	"	"	"	"	"	
Xylene (p/m)	ND	0.00100	"	"	"	"	"	"	
Xylene (o)	ND	0.00100	"	"	"	"	"	"	
Surrogate: a,a,a-Trifluorotoluene		*102 %*	*80-120*		"	"	"	"	
Surrogate: 4-Bromofluorobenzene		*98.0 %*	*80-120*		"	"	"	"	
WP 17 (5H10003-02) Water									
Benzene	**5.28**	0.0250	mg/L	25	EH51609	08/16/05	08/16/05	EPA 8021B	
Toluene	**0.0909**	0.0250	"	"	"	"	"	"	
Ethylbenzene	**1.22**	0.0250	"	"	"	"	"	"	
Xylene (p/m)	**0.242**	0.0250	"	"	"	"	"	"	
Xylene (o)	**0.0408**	0.0250	"	"	"	"	"	"	
Surrogate: a,a,a-Trifluorotoluene		*109 %*	*80-120*		"	"	"	"	
Surrogate: 4-Bromofluorobenzene		*113 %*	*80-120*		"	"	"	"	
WP 18 (5H10003-03) Water									
Benzene	**1.03**	0.0250	mg/L	25	EH51609	08/16/05	08/16/05	EPA 8021B	
Toluene	**0.0294**	0.0250	"	"	"	"	"	"	
Ethylbenzene	**0.354**	0.0250	"	"	"	"	"	"	
Xylene (p/m)	**0.216**	0.0250	"	"	"	"	"	"	
Xylene (o)	**J [0.0169]**	0.0250	"	"	"	"	"	"	
Surrogate: a,a,a-Trifluorotoluene		*112 %*	*80-120*		"	"	"	"	
Surrogate: 4-Bromofluorobenzene		*107 %*	*80-120*		"	"	"	"	

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EH51609 - EPA 5030C (GC)										
Blank (EH51609-BLK1)				Prepared & Analyzed: 08/16/05						
Benzene	ND	0.00100	mg/L							
Toluene	ND	0.00100	"							
Ethylbenzene	ND	0.00100	"							
Xylene (p/m)	ND	0.00100	"							
Xylene (o)	ND	0.00100	"							
Surrogate: a,a,a-Trifluorotoluene	*97.9*		*ug/l*	*100*		*97.9*	*80-120*			
Surrogate: 4-Bromofluorobenzene	*81.4*		*"*	*100*		*81.4*	*80-120*			
LCS (EH51609-BS1)				Prepared & Analyzed: 08/16/05						
Benzene	98.4		ug/l	100		98.4	80-120			
Toluene	97.0		"	100		97.0	80-120			
Ethylbenzene	106		"	100		106	80-120			
Xylene (p/m)	204		"	200		102	80-120			
Xylene (o)	104		"	100		104	80-120			
Surrogate: a,a,a-Trifluorotoluene	*104*		*"*	*100*		*104*	*80-120*			
Surrogate: 4-Bromofluorobenzene	*95.4*		*"*	*100*		*95.4*	*80-120*			
Calibration Check (EH51609-CCV1)				Prepared: 08/16/05 Analyzed: 08/17/05						
Benzene	94.2		ug/l	100		94.2	80-120			
Toluene	94.5		"	100		94.5	80-120			
Ethylbenzene	106		"	100		106	80-120			
Xylene (p/m)	203		"	200		102	80-120			
Xylene (o)	109		"	100		109	80-120			
Surrogate: a,a,a-Trifluorotoluene	*94.9*		*"*	*100*		*94.9*	*0-200*			
Surrogate: 4-Bromofluorobenzene	*102*		*"*	*100*		*102*	*0-200*			
Matrix Spike (EH51609-MS1)	**Source: 5H11006-01**			Prepared: 08/16/05 Analyzed: 08/17/05						
Benzene	91.6		ug/l	100	ND	91.6	80-120			
Toluene	90.2		"	100	ND	90.2	80-120			
Ethylbenzene	101		"	100	ND	101	80-120			
Xylene (p/m)	191		"	200	ND	95.5	80-120			
Xylene (o)	102		"	100	ND	102	80-120			
Surrogate: a,a,a-Trifluorotoluene	*91.5*		*"*	*100*		*91.5*	*80-120*			
Surrogate: 4-Bromofluorobenzene	*97.9*		*"*	*100*		*97.9*	*80-120*			

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EH51609 - EPA 5030C (GC)										
Matrix Spike Dup (EH51609-MSD1)	**Source: 5H11006-01**			Prepared: 08/16/05 Analyzed: 08/17/05						
Benzene	95.5		ug/l	100	ND	95.5	80-120	4.17	20	
Toluene	94.5		"	100	ND	94.5	80-120	4.66	20	
Ethylbenzene	106		"	100	ND	106	80-120	4.83	20	
Xylene (p/m)	201		"	200	ND	100	80-120	4.60	20	
Xylene (o)	108		"	100	ND	108	80-120	5.71	20	
Surrogate: a,a,a-Trifluorotoluene	*82.3*		"	*100*		*82.3*	*80-120*			
Surrogate: 4-Bromofluorobenzene	*92.9*		"	*100*		*92.9*	*80-120*			

Notes and Definitions

DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the 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 Tuttle Date: 8-18-05

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer
Jeanne Mc Murrey, Inorg. Tech Director
LaTasha Cornish, Chemist
Sandra Sanchez, Lab Tech.

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

Client: Larson

Date/Time: 8/10/05

Order #: 5H10003

Initials: CK

Sample Receipt Checklist

Temperature of container/cooler?	Yes	No	2.5 C
Shipping container/cooler in good condition?	Yes	No	
Custody Seals intact on shipping container/cooler?	Yes	No	Not present
Custody Seals intact on sample bottles?	Yes	No	Not present
Chain of custody present?	Yes	No	
Sample Instructions complete on Chain of Custody?	Yes	No	
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?	Yes	No	
Sample Matrix and properties same as on chain of custody?	Yes	No	
Samples in proper container/bottle?	Yes	No	
Samples properly preserved?	Yes	No	
Sample bottles intact?	Yes	No	
Preservations documented on Chain of Custody?	Yes	No	
Containers documented on Chain of Custody?	Yes	No	
Sufficient sample amount for indicated test?	Yes	No	
All samples received within sufficient hold time?	Yes	No	
VOC samples have zero headspace?	Yes	No	Not Applicable

Other observations:

Variance Documentation:

Contact Person: - Date/Time: Contacted by:

Regarding:

Corrective Action Taken:

CHAIN—OF—CUSTODY RECORD

LA arson & Associates, Inc.
Environmental Consultants
Fax: 432-687-0456
432-687-0901
507 N. Marienfeld, Ste. 202 • Midland, TX 79701

CLIENT NAME: Dynegy

SITE MANAGER: Cindy Crain

PROJECT NO.: 2-0108

PROJECT NAME: Monument GP

PAGE 1 OF 1

LAB. PO #

DATE	TIME	WATER	SOIL	OTHER	SAMPLE IDENTIFICATION	NUMBER OF CONTAINERS	PARAMETERS/METHOD NUMBER: BTEX	LAB. I.D. NUMBER (LAB USE ONLY)	REMARKS (I.E., FILTERED, UNFILTERED, PRESERVED, UNPRESERVED, GRAB COMPOSITE)
8/9	1150	✓			WP 16	2	2	10003-01	
8/9	1409	✓			WP 17	2	2	-02	
8/9	1450	✓			WP 18	2	2	-03	

SAMPLED BY: (Signature) DATE: 8/9 TIME: 1500

RELINQUISHED BY: (Signature) DATE: 8/10 TIME: 0845

RECEIVED BY: (Signature) DATE: TIME:

RELINQUISHED BY: (Signature) DATE: TIME:

RECEIVED BY: (Signature) DATE: TIME:

SAMPLE SHIPPED BY: (Circle)
FEDEX BUS AIRBILL #:
HAND DELIVERED UPS OTHER:

COMMENTS:

TURNAROUND TIME NEEDED

WHITE – RECEIVING LAB
YELLOW – RECEIVING LAB (TO BE RETURNED TO LA AFTER RECEIPT)
PINK – PROJECT MANAGER
GOLD – QA/QC COORDINATOR

RECEIVING LABORATORY: ELOT
ADDRESS:
CITY: STATE: ZIP:
CONTACT: PHONE:

RECEIVED BY: (Signature)
DATE: 8/10/05 TIME: 8:45

SAMPLE CONDITION WHEN RECEIVED:
Intact 2.5 °C

LA CONTACT PERSON:

SAMPLE TYPE:

ENVIRONMENTAL LAB OF

12600 West I-20 East - Odessa, Texas 79765

Analytical Report

Prepared for:

Cindy Crain

Larson & Associates, Inc.

P.O. Box 50685

Midland, TX 79710

Project: Dynegy Monument GWM

Project Number: 2-0108

Location: None Given

Lab Order Number: 5I13011

Report Date: 09/26/05

Larson & Associates, Inc.	Project: Dynegy Monument GWM	Fax: (432) 687-0456
P.O. Box 50685	Project Number: 2-0108	**Reported:**
Midland TX, 79710	Project Manager: Cindy Crain	09/26/05 16:02

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
WP-18	5I13011-01	Water	09/13/05 13:40	09/13/05 16:10

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Larson & Associates, Inc.	Project: Dynegy Monument GWM	Fax: (432) 687-0456
P.O. Box 50685	Project Number: 2-0108	**Reported:**
Midland TX, 79710	Project Manager: Cindy Crain	09/26/05 16:02

Fingerprint by GC

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
WP-18 (5I13011-01) Water									
C6-C8	**6.26**	0.000100	%	1	EI52606	09/26/05	09/26/05	GC FID	
>C8-C10	**15.4**	0.000100	"	"	"	"	"	"	
>C10-C12	**15.8**	0.000100	"	"	"	"	"	"	
>C12-C16	**49.7**	0.000100	"	"	"	"	"	"	
>C16-C21	**11.7**	0.000100	"	"	"	"	"	"	
>C21-C35	**1.14**	0.000100	"	"	"	"	"	"	

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Larson & Associates, Inc.	Project: Dynegy Monument GWM	Fax: (432) 687-0456
P.O. Box 50685	Project Number: 2-0108	**Reported:**
Midland TX, 79710	Project Manager: Cindy Crain	09/26/05 16:02

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Notes and Definitions

DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the 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 Tuttle Date: 9/26/2005

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer
Jeanne Mc Murrey, Inorg. Tech Director
LaTasha Cornish, Chemist
Sandra Sanchez, Lab Tech.

CHAIN—OF—CUSTODY RECORD

LA Larson & Associates, Inc.
Environmental Consultants
Fax: 432-687-0456
432-687-0901
507 N. Marienfeld, Ste. 202 • Midland, TX 79701

CLIENT NAME: Dynegy

SITE MANAGER: Cindy Crain

PROJECT NO.: 2-0108

PROJECT NAME: Monument GW

PAGE 1 OF 1

LAB. PO #

DATE	TIME	WATER	SOIL	OTHER	SAMPLE IDENTIFICATION	NUMBER OF CONTAINERS	PARAMETERS/METHOD NUMBER: Fingerprint	LAB. I.D. NUMBER (LAB USE ONLY)	REMARKS (I.E.; FILTERED, UNFILTERED, PRESERVED, UNPRESERVED, GRAB COMPOSITE)
9/13	1340			✓	WP-18	1	1	511301-01	

SAMPLED BY: (Signature) DATE: 9/13 TIME: 1340

RELINQUISHED BY: (Signature) DATE: 9/13 TIME: 1610

RECEIVED BY: (Signature) DATE: TIME:

RELINQUISHED BY: (Signature) DATE: TIME:

RECEIVED BY: (Signature) DATE: TIME:

SAMPLE SHIPPED BY: (Circle)
FEDEX BUS AIRBILL #:
HAND DELIVERED UPS OTHER:

COMMENTS:

TURNAROUND TIME NEEDED

WHITE – RECEIVING LAB
YELLOW – RECEIVING LAB (TO BE RETURNED TO LA AFTER RECEIPT)
PINK – PROJECT MANAGER
GOLD – QA/QC COORDINATOR

RECEIVING LABORATORY: ELOT
ADDRESS:
CITY: STATE: ZIP:
CONTACT: PHONE:

RECEIVED BY: (Signature)
DATE: 9/13/05 TIME: 1610

SAMPLE CONDITION WHEN RECEIVED: 6.5°C @ 40ml glass VOA no NCl

LA CONTACT PERSON:

SAMPLE TYPE:

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

Client: Larson

Date/Time: 9/12/05 16:10

Order #: 511301

Initials: CK

Sample Receipt Checklist

Temperature of container/cooler?	Yes	No	6.5 C
Shipping container/cooler in good condition?	Yes	No	
Custody Seals intact on shipping container/cooler?	Yes	No	Not present
Custody Seals intact on sample bottles?	Yes	No	Not present
Chain of custody present?	Yes	No	
Sample Instructions complete on Chain of Custody?	Yes	No	
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?	Yes	No	
Sample Matrix and properties same as on chain of custody?	Yes	No	
Samples in proper container/bottle?	Yes	No	
Samples properly preserved?	Yes	No	X
Sample bottles intact?	Yes	No	
Preservations documented on Chain of Custody?	Yes	No	
Containers documented on Chain of Custody?	Yes	No	
Sufficient sample amount for indicated test?	Yes	No	
All samples received within sufficient hold time?	Yes	No	
VOC samples have zero headspace?	Yes	No	Not Applicable

Other observations:

X Sample brought on ice & sampled 30 minutes prior.

Variance Documentation:

Contact Person: - Date/Time: Contacted by:

Regarding:

Corrective Action Taken:

ENVIRONMENTAL LAB OF

12600 West I-20 East - Odessa, Texas 79765

Analytical Report

Prepared for:

Cindy Crain

Larson & Associates, Inc.

P.O. Box 50685

Midland, TX 79710

Project: Dynegy Monument GWM

Project Number: 2-0108

Location: None Given

Lab Order Number: 5I13011

Report Date: 09/26/05

Larson & Associates, Inc.	Project: Dynegy Monument GWM	Fax: (432) 687-0456
P.O. Box 50685	Project Number: 2-0108	**Reported:**
Midland TX, 79710	Project Manager: Cindy Crain	09/26/05 15:33

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
WP-18	5I13011-01	Water	09/13/05 13:40	09/13/05 16:10

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Fingerprint by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
WP-18 (5I13011-01) Water									
C6-C8	**6.26**	0.000100	%	1	EI52606	09/26/05	09/26/05	GC FID	
>C8-C10	**15.4**	0.000100	"	"	"	"	"	"	
>C10-C12	**15.8**	0.000100	"	"	"	"	"	"	
>C12-C16	**49.7**	0.000100	"	"	"	"	"	"	
>C16-C21	**11.7**	0.000100	"	"	"	"	"	"	
>C21-C35	**1.14**	0.000100	"	"	"	"	"	"	

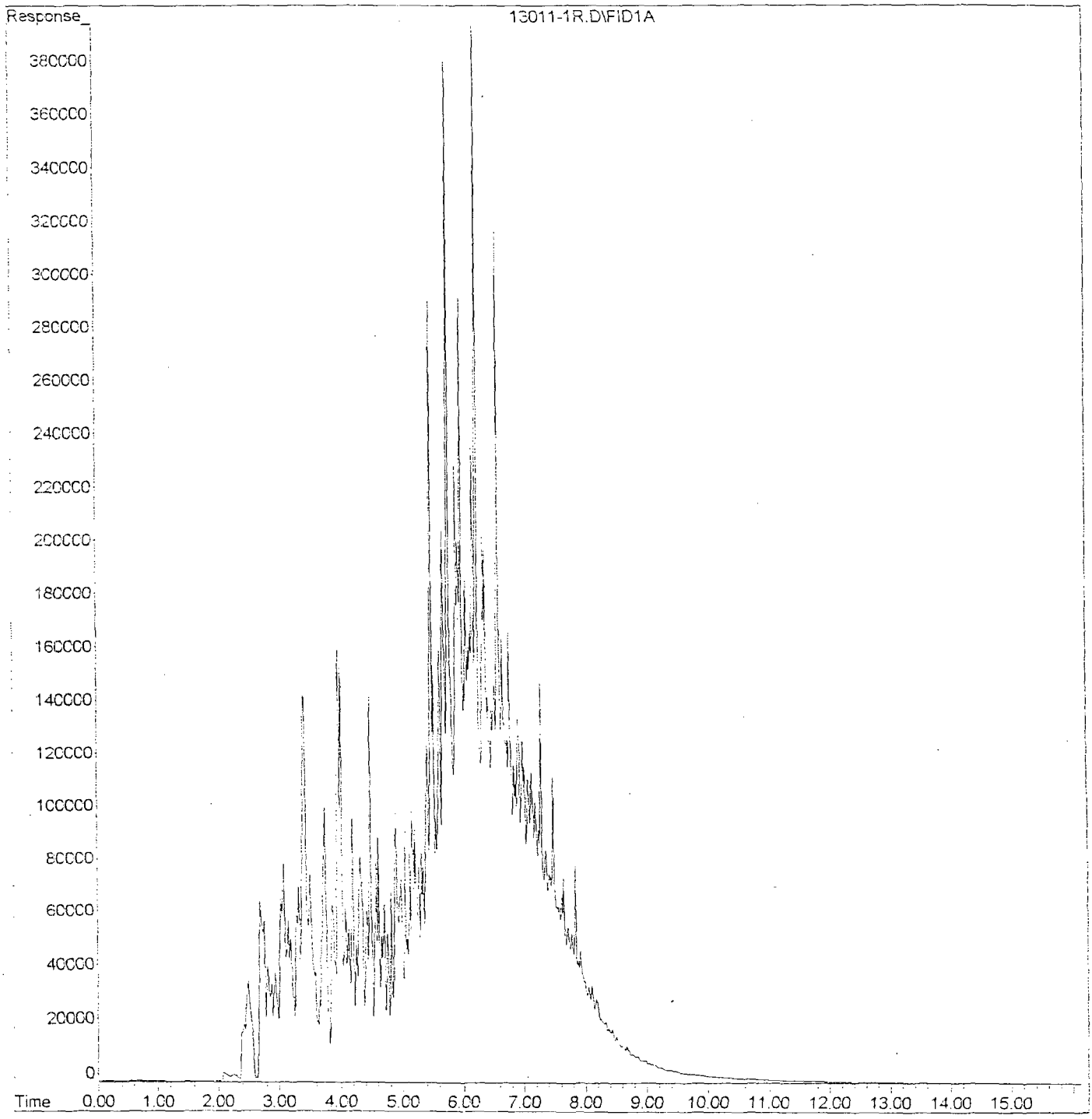
Notes and Definitions

DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the 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. Tuttle Date: 9-26-05

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer
Jeanne Mc Murrey, Inorg. Tech Director
LaTasha Cornish, Chemist
Sandra Sanchez, Lab Tech.

File : C:\HPCHEM\1\DATA\092305\13011-1R.D
Operator : CDK
Acquired : 25 Sep 2005 10:19 am using AcqMethod FGRRTC.M
Instrument : GC/MS Ins
Sample Name: 5i13011-01
Misc Info :
Vial Number: 4



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

Client: Larson

Date/Time: 9/13/05 16:10

Order #: 5I13011

Initials: CK

Sample Receipt Checklist

Temperature of container/cooler?	Yes	No	6.5 C
Shipping container/cooler in good condition?	(Yes)	No	
Custody Seals intact on shipping container/cooler?	Yes	No	(Not present)
Custody Seals intact on sample bottles?	Yes	No	(Not present)
Chain of custody present?	(Yes)	No	
Sample Instructions complete on Chain of Custody?	(Yes)	No	
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?	(Yes)	No	
Sample Matrix and properties same as on chain of custody?	(Yes)	No	
Samples in proper container/bottle?	(Yes)	No	
Samples properly preserved?	(Yes)	No	X
Sample bottles intact?	(Yes)	No	
Preservations documented on Chain of Custody?	(Yes)	No	
Containers documented on Chain of Custody?	(Yes)	No	
Sufficient sample amount for indicated test?	(Yes)	No	
All samples received within sufficient hold time?	(Yes)	No	
VOC samples have zero headspace?	Yes	No	(Not Applicable)

Other observations:

X Sample brought in on ice & sampled 30 minutes prior.

Variance Documentation:

Contact Person: - Date/Time: Contacted by:

Regarding:

Corrective Action Taken:

CHAIN—OF—CUSTODY RECORD

Larson & Associates, Inc.
Environmental Consultants
Fax: 432-687-0456
432-687-0901
507 N. Marienfeld, Ste. 202 • Midland, TX 79701

CLIENT NAME: Dynegy

SITE MANAGER: Cindy Crain

PROJECT NO.: 2-0108

PROJECT NAME: Monument GW

PAGE 1 OF 1

LAB. PO #

DATE	TIME	WATER	SOIL	OTHER	SAMPLE IDENTIFICATION	NUMBER OF CONTAINERS	PARAMETERS/METHOD NUMBER: Fingerprint	LAB. I.D. NUMBER (LAB USE ONLY)	REMARKS (I.E., FILTERED, UNFILTERED, PRESERVED, UNPRESERVED, GRAB COMPOSITE)
9/13	1340			✓	WP-18	1	1	5I130[1-01	

SAMPLED BY: (Signature) DATE: 9/13 TIME: 1340

RELINQUISHED BY: (Signature) DATE: 9/13 TIME: 1610

RECEIVED BY: (Signature) DATE: TIME:

RELINQUISHED BY: (Signature) DATE: TIME:

RECEIVED BY: (Signature) DATE: TIME:

SAMPLE SHIPPED BY: (Circle)
FEDEX BUS AIRBILL #:
HAND DELIVERED UPS OTHER:

COMMENTS:

TURNAROUND TIME NEEDED

WHITE – RECEIVING LAB
YELLOW – RECEIVING LAB (TO BE RETURNED TO LA AFTER RECEIPT)
PINK – PROJECT MANAGER
GOLD – QA/QC COORDINATOR

RECEIVING LABORATORY: ELOT
ADDRESS:
CITY: STATE: ZIP:
CONTACT: PHONE:

RECEIVED BY: (Signature)
DATE: 9/13/05 TIME: 16:10

SAMPLE CONDITION WHEN RECEIVED: 6.5°C 40ml glass VOA no NCl

LA CONTACT PERSON:

SAMPLE TYPE: