NM1 - 6

C-138

YEAR(S):

1997-1998

P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-13
Originated 8/8/

Submit Origi
Plus 1 Co
to appropria
District Offi

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Lovington Facili
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Triad & I & W
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State NM
7. Location of Material (Street Address or ULSTR) 5 miles south of Lovington On HWY 18 Lovingt	

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajo Refining Lovington facility. The material was generated by a recent shutdown at the Navajo Refining Lovington facility. The analytical is for the following: 1.) Petroleum Refining - crude tower sludge 2.) Petroleum Refining - deslater sludge 3.) Petroleum Refining - hydrocarbon contaminated soil 4.) Petroleum Refining - flare line sludge 5.) Petroleum Refining - cooling tower sludge. I have included the certificates of waste and the chain of custody. The following is the amounts: crude tower sludge - 10 yards, deslater sludge - 1000 barrels, hydrocarbon contaminated soil - 15 yards, flare line sludge 500 barrels, and cooling tower sludge - 10 yards.

ITEMS 1, 3, 4, 5 - APPROVED ITEM 2 - DESALTER - HOLD SEE ATTACHED LETTER!

DEC 1997 Received Hobbs OCD

Estimated Volume _____ cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

lw Price 12/31/97

Item 2 - Hold - MJK - 1/13/98 Approved #2 1/21/98

SIGNATURE: Billie Charo TITLE: Office Manager DATE: 12/22/97

Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

1/15/98 1/21/98 Sent Hobbs

(This space for State Use)

APPROVED BY: [signature] TITLE: Env Engr DATE: 12/31/97

APPROVED BY: Martyn J Kuhy Approve 1, 3, 4, 5 only Items TITLE: Env Geologist DATE: 1/13/97

Martyn J Kuhy Approve Item #2 Desalter Sludge 1/21/97

Martyne Kieling

From: Price, Wayne
Sent: Friday, January 16, 1998 12:04 PM
To: Martyne Kieling
Cc: Roger Anderson; Chris Williams
Subject: Refinery desalter sludges

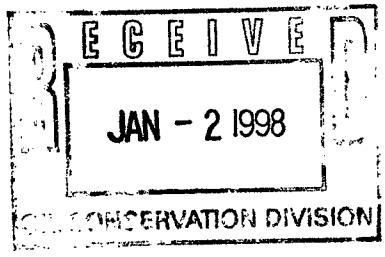
Dear Martyne,

I just received a telephone call from EPA-Dallas Joel Daugherty, Joel had received information from EPA Wash. DC. Mr. Maz Diaz EPA DC indicated the original intent was not to list Desalter sludge because it was not actually part of the wastewater system. Therefore if this waste passes hazardous chacteristics then it would not be regulated as RCRA haz waste.

Therefore I am recommending that we approve the Desalter sludge for the CRI/Navajo submittal.

cc: Ken Marsh CRI

Price, Wayne



From: Price, Wayne
Sent: Wednesday, December 31, 1997 11:14 AM
To: Martyne Kieling
Cc: Chris Williams
Subject: CRI/Navajo Lovington C-138 Dated 12/22/97

Dear Martyne:

Please note I am dropping in the mail today the above referenced C-138.

There were five items:

I approved the following :

#1- Crude tower sludge
#3- Hydrocarbon contaminated soil
#4- Flare line sludge
#5- Cooling tower sludge.

Item # 2- Desalter sludge (1000 bbls) I am recommending for us to hold until we receive a ruling.

Please note we have previously approved desalter sludge from Navajo-Artesia, however CRI indicated this material was going to be re-cycled thus excluding it from being a waste. They have not indicated what their plans are on this waste. Navajo's analytical for full TCLP is non-hazardous.

Item of concern: Since the Desalter sludge comes in contact with plant wastewater's which could be classified as F037 & F038 listed Hazardous waste, then does this make this sludge hazardous waste.
Benzene Benzo(a)pyrene chrysene, lead, chromium
I have performed the following research:

Contacted RCRA hot line; referred to Fed. Reg. Nov 2, 1990 55FR46354, & May 13, 1991 56FR21955. I do not have access to these. According to RCRA HTL they referenced Desalter wastewater sludge. If you can access these if might help.

Called NMED- out of office.
Called EPA-Dallas- Discussed with Joel Dougherty works for Passia, His preliminary research indicated it would probably be hazardous, however he wanted to check with EPA DC personnel who were more knowledgeable on this issue. He will call back. Please feel free to call him at 214-665-2281 direct line.

Called Bryan Madrid-Navajo Environmental Specialist- Bryan indicated he did not have any ruling from any agency except the fact that the NMOCD had approved in the past.

Sampling & Testing concern: They indicate this material is 1000 bbls. Which would indicate it is part liquid. Did laboratory per TCLP 1311 procedure sample the liquid phase also?

Common sense approach: I am somewhat familiar with Refinery Desalters and realize this material probably does not present any other environmental concern than would any ordinary crude oil or crude oil tank bottoms, plus the fact that it is TCLP non-hazardous.

Regulatory Concern: I want to make sure the NMOCD permitted facilities and the Refinery generator do not accidentally dispose of any hazardous waste by definition into permitted facilities that can only take non-hazardous materials. This caution hopefully is for everyone's protection.

TELEPHONE
(505) 748-3311

EASYLINK
62905278

Navajo REFINING COMPANY

501 EAST MAIN STREET • P. O. BOX 159
ARTESIA, NEW MEXICO 88211-0159

FAX
(505) 746-6410 ACCTG
(505) 746-6155 EXEC
(505) 748-9077 ENGR
(505) 746-4438 P / L

December 16, 1997

Ken Marsh
CRI Inc.
P.O. Box 369
Hobbs, NM 88241

Dear Mr. Marsh:

In order to run an efficient refinery, units are periodically shut down to perform routine cleaning and maintenance. As can be expected, many wastes are generated during these turnarounds. A recent shutdown at our Lea Refining Plant in Lovington, NM produced a few wastes that we would like to get approved into your facility. Below you will find a brief description along with the amount and type of container that will be used to deliver these wastes to your facility.

First of all, a sample of each waste was taken and sent off to Trace Analysis Inc. to have a TCLP run on them. Enclosed you will find a copy of these analyses along with a Certificate of Waste Status for each material sampled.

In our crude tower, T-101, heat and boiling points are used to separate raw crude into products such as asphalt, gas oil, and diesel. Over time, sludge that cannot be further processed builds up in the bottom of the tower and essentially becomes a waste. A clean out of our crude tower produced approximately 10 yards of sludge that was then placed in a 20 yard roll off bin.

In our desalter, crude and water are mixed together and passed across an electrostatic field. This causes brine, salt, and water to drop to the bottom of the desalter in a sludge form. Clean crude is then passed on for further processing. Approximately 1000 barrels of desalter sludge was pumped out of the desalter and placed into two frac. tanks.

During the turnaround, accidental spills to the bare ground occurred as a result of draining lines and pumps, removing hoses, etc. Approximately 15 yards of soil contaminated with crude, gas oil, diesel, asphalt, kerosene, and naphtha were dug up and placed into a 20 yard roll off bin.

During upsets such as tower over pressuring, flaring is often necessary in order to stabilize a process unit. When flaring, solids will build up on the inside walls of the flare line and occasionally need to be cleaned out. Approximately 500 barrels of flare line sludge was accumulated by pumping water into one end of the line and draining the solids out of the other into a frac. tank.

Hot water from the plant is cooled by running it through our cooling tower. Scale in the lines along with dirt blown into the tower cause a sludge to build up on the bottom. This sludge was cleaned out with approximately 10 yards placed into a 20 yard roll off bin.

Since TCLP analyses show all substances to be non-hazardous, we are planning to ship the wastes in the roll off bins on trucks from Triad Transportation. The sludges in frac. tanks will be hauled in pumper trucks from I&W Inc.

If you have any questions concerning this material, please feel free to contact me at (505) 748-3311.

Sincerely,

Bryan Madrid

Bryan Madrid
Environmental Specialist

Encl.

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: LEA REFINING

Sources: Petroleum Refining - CRUDE Tower SLUDGE

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO Refining concur with the status of the waste from the subject site.

Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 12-17-97

DEC 1997
Received
Hobbs
OCD

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: Lea Refining

Sources: Petroleum Refining - Hydrocarbon Contaminated Soil

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for Navajo Refining concur with the status of the waste from the subject site.

Name Bryan Madrid

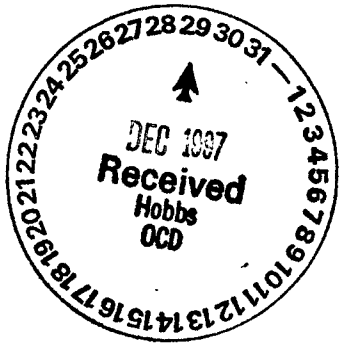
Title/Agency Env. Spec.

Address 501 E. Main

Artesia, NM 88210

Signature Bryan Madrid

Date 12/17/97



CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: LEA Refining

Sources: Petroleum Refining - Desalter Sludge

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for Navajo Refining concur with the status of the waste from the subject site.

Name Bryan Madrid

Title/Agency Env. Spec.

Address 501 E. Main

Artesia, NM 88210

Signature Bryan Madrid

Date 12-17-97

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: Lea Refining

Sources: Petroleum Refining - Flare Line Sludge

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for Navajo Refining concur with the status of the waste from the subject site.

Name Bryan Madrid

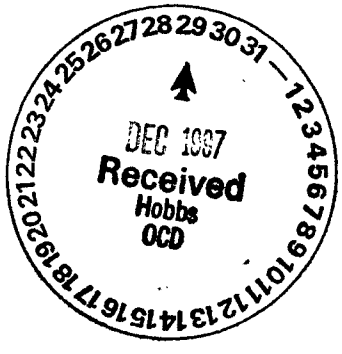
Title/Agency Env. Spec.

Address 501 E. Main

Artesia, NM 88210

Signature Bryan Madrid

Date 12-17-97



CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: Lea Refining

Sources: Petroleum Refining - Cooling Tower Sludge

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for Navajo Refining concur with the status of the waste from the subject site.

Name Bryan Madrid

Title/Agency Env. Spec.

Address 501 E. Main

Artesia, NM 88210

Signature Bryan Madrid

Date 12-17-97

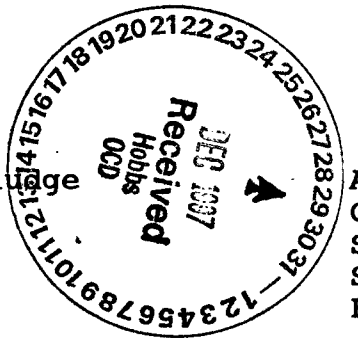
DEC 1997
Received
Hobbs
OCD

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL REPORT

CLIENT NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

SAMPLE NO. : 7703998
INVOICE NO.: TE0082
REPORT DATE: 10-30-97
REVIEWED BY:
PAGE : 1 OF 1



CLIENT SAMPLE ID : T-101(Crude Tower)Sludge
SAMPLE TYPE .....: Sludge
SAMPLED BY .....: B. Madul
SUBMITTED BY ....: D. Moore
SAMPLE SOURCE ...: Lovington NM

AUTHORIZED BY : D. Moore
CLIENT P.O. : --
SAMPLE DATE ...: 10-21-97
SUBMITTAL DATE : 10-22-97
EXTRACTION DATE: --

TCLP Metals

D A T A T A B L E

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Arsenic (TCLP)	<0.050	mg/L	0.050	10-28-97	SW846 7061	N. Munir
Barium (TCLP)	<5.0	mg/L	5.0	10-29-97	SW846 7080A	N. Munir
Cadmium (TCLP)	<0.25	mg/L	0.25	10-28-97	SW846 7130	N. Munir
Chromium (TCLP)	<0.50	mg/L	0.50	10-28-97	SW846 7190	N. Munir
Lead (TCLP)	<0.75	mg/L	0.75	10-28-97	SW846 7420	N. Munir
Mercury (TCLP)	<0.010	mg/L	0.010	10-24-97	SW846 7471A	N. Munir
Selenium (TCLP)	<0.050	mg/L	0.050	10-28-97	SW846 7741A	N. Munir
Silver (TCLP)	<0.25	mg/L	0.25	10-28-97	SW846 7760A	N. Munir

ANALYTICAL RESULT(S) REPORTED HEREIN APPLY ONLY TO THE SAMPLE(S) TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY.

(1) Copy to Client

MANAGING DIRECTOR

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Darrell Moore
501 E. Main
Artesia NM 88210

Date: Nov 13, 1997
Date Rec: 10/25/97
Project: N/A
Proj Name: N/A
Proj Loc: Lovington

Lab Receiving # : 9710000440
Sampling Date: 10/21/97
Sample Condition: Intact and Cool
Sample Received By: ML

TCLP Vol in Sludge (mg/L)	EPA Limit	Reporting Limit	Method Blank	T84068 T-101 Crude Twr	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	105	9	78	105
1,1-Dichloroethene	0.7	0.05	ND	ND	101	9	87	101
Methyl Ethyl Ketone	200.0	0.50	ND	ND	93	1	104	93
Chloroform	6.0	0.05	ND	ND	104	3	103	104
1,2-Dichloroethane	0.5	0.05	ND	ND	112	7	103	112
Benzene	0.5	0.05	ND	ND	100	4	97	100
Carbon Tetrachloride	0.5	0.05	ND	ND	118	7	112	118
Trichloroethene	0.5	0.05	ND	ND	98	5	97	98
Tetrachloroethane	0.7	0.05	ND	ND	94	5	93	94
Chlorobenzene	100.0	0.05	ND	ND	98	4	93	98
1,4-Dichlorobenzene	7.5	0.05	ND	ND	100	4	94	100

	% RECOVERY
Dibromofluoromethane	93
Toluene-d8	94
4-Bromofluorobenzene	90

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	10/28/97	EPA 8260	10/29/97	RW	100 ea	100 ea

Director, Dr. Blair Leftwich

11-13-97
Date

TRACE ANALYSIS, INC.
A Laboratory for Advanced Environmental Research and Analysis

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Darrell Moore
501 E. Main
Artesia, NM 88210

November 10, 1997
Receiving Date: 10/22/97
Sample Type: Sludge
Project No: NA
Project Location: Lovington, NM

Extraction Date: 11/03/97
Analysis Date: 11/05/97
Sampling Date: 10/21/97
Sample Condition: Intact & Cool
Sample Received by: RP
Project Name: NA

T84068/7703998

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T-101 (Crude Tower) Sludge	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	81	*150	7	101
1,4-Dichlorobenzene	7.5	0.05	ND	93	9	39	116
o-Cresol	200.0	0.05	ND	74	1	84	93
m,p-Cresol	200.0	0.05	ND	93	1	64	116
Total Cresol	200.0	0.05	ND	---	---	---	---
Hexachloroethane	3.0	0.05	ND	86	3	30	108
Nitrobenzene	2.0	0.05	ND	86	15	49	108
Hexachlorobutadiene	0.5	0.05	ND	73	20	26	91
2,4,6-Trichlorophenol	2.0	0.05	ND	78	10	55	98
2,4,5-Trichlorophenol	400.0	0.05	ND	75	7	53	94
2,4-Dinitrotoluene	0.13	0.05	ND	91	8	62	114
2,4-D	10.0	0.05	ND	65	14	24	81
Hexachlorobenzene	0.13	0.05	ND	89	1	67	111
2,4,5-TP	1.0	0.05	ND	94	13	45	118
Pentachlorophenol	100.0	0.05	ND	84	2	79	105

***NOTE: RPD Out of Limits.**

ND - Not Detected

Surrogates	**% RECOVERY**
2-Fluorophenol	22
Phenol-d6	46
Nitrobenzene-d5	63
2-Fluorobiphenyl	54
2,4,6-Tribromophenol	47
Terphenyl-d14	94

Methods: EPA SW 846-1311, 8270.
CHEMIST: RP/HW

Director, Dr. Blair Leftwich

11-10-97
DATE

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL REPORT

CLIENT NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

SAMPLE NO. : 7703998
INVOICE NO.: TE0082
REPORT DATE: 11-12-97
REVIEWED BY:
PAGE : 1 OF 1

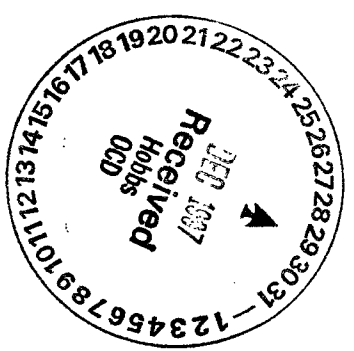
CLIENT SAMPLE ID : T-101(Crude Tower)Sludge
SAMPLE TYPE .....: Sludge
SAMPLED BY .....: B. Madul
SUBMITTED BY ....: D. Moore
SAMPLE SOURCE ...: Lovington NM

AUTHORIZED BY : D. Moore
CLIENT P.O. : --
SAMPLE DATE ...: 10-21-97
SUBMITTAL DATE : 10-22-97
EXTRACTION DATE: --

Inorganic Non-Metals-Solids

D A T A T A B L E

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Flash Point .....:	>180	degrees F	N/A	10-30-97	SW-1010	A. Donohue
Corrosivity .....:	-		+/-	10-30-97	SW-9045 C	A. Donohue



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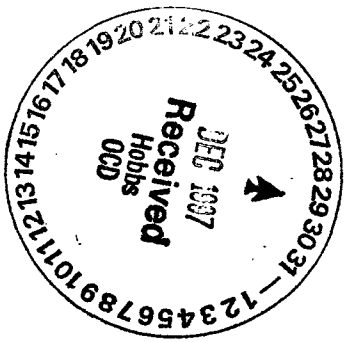
MANAGING DIRECTOR

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL REPORT

CLIENT NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

SAMPLE NO. : 7704001
INVOICE NO.: TE0082
REPORT DATE: 10-30-97
REVIEWED BY:
PAGE : 1 OF 1



CLIENT SAMPLE ID : DeSalter Sludge
SAMPLE TYPE .....: Sludge
SAMPLED BY .....: B. Madul
SUBMITTED BY ....: D. Moore
SAMPLE SOURCE ...: Lovington NM

AUTHORIZED BY : D. Moore
CLIENT P.O. : --
SAMPLE DATE ...: 10-21-97
SUBMITTAL DATE : 10-22-97
EXTRACTION DATE: --

TCLP Metals

D A T A T A B L E

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Arsenic (TCLP) .....:	<0.050	mg/L	0.050	10-28-97	SW846 7061	N. Munir
Barium (TCLP) .....:	<5.0	mg/L	5.0	10-29-97	SW846 7080A	N. Munir
Cadmium (TCLP) .....:	<0.25	mg/L	0.25	10-28-97	SW846 7130	N. Munir
Chromium (TCLP) .....:	<0.50	mg/L	0.50	10-28-97	SW846 7190	N. Munir
Lead (TCLP) .....:	<0.75	mg/L	0.75	10-28-97	SW846 7420	N. Munir
Mercury (TCLP) .....:	<0.010	mg/L	0.010	10-24-97	SW846 7471A	N. Munir
Selenium (TCLP) .....:	<0.050	mg/L	0.050	10-28-97	SW846 7741A	N. Munir
Silver (TCLP) .....:	<0.25	mg/L	0.25	10-28-97	SW846 7760A	N. Munir

ANALYTICAL RESULT(S) REPORTED HEREIN APPLY ONLY TO THE SAMPLE(S) TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY.

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MANAGING DIRECTOR

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Lubbock, Texas 79424
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ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Darrell Moore
501 E. Main
Artesia NM 88210

Date: Nov 13, 1997
Date Rec: 10/25/97
Project: N/A
Proj Name: N/A
Proj Loc: Lovington

Lab Receiving # : 9710000440
Sampling Date: 10/21/97
Sample Condition: Intact and Cool
Sample Received By: ML

TCLP Vol in Sludge (mg/L)	EPA Limit	Reporting Limit	Method Blank	T84071 Desalter	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.1	ND	ND	105	9	78	105
1,1-Dichloroethene	0.7	0.1	ND	ND	101	9	87	101
Methyl Ethyl Ketone	200.0	0.1	ND	ND	93	1	104	93
Chloroform	6.0	0.1	ND	ND	104	3	103	104
1,2-Dichloroethane	0.5	0.1	ND	ND	112	7	103	112
Benzene	0.5	0.1	ND	ND	100	4	97	100
Carbon Tetrachloride	0.5	0.1	ND	ND	118	7	112	118
Trichloroethene	0.5	0.1	ND	ND	98	5	97	98
Tetrachloroethane	0.7	0.1	ND	ND	94	5	93	94
Chlorobenzene	100.0	0.1	ND	ND	98	4	93	98
1,4-Dichlorobenzene	7.5	0.1	ND	ND	100	4	94	100

	% RECOVERY
Dibromofluoromethane	91
Toluene-d8	97
4-Bromofluorobenzene	90

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	10/28/97	EPA 8260	10/29/97	RW	100 ea	100 ea

Director, Dr. Blair Leftwich

11-13-97
Date

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Darrell Moore
501 E. Main
Artesia, NM 88210

November 10, 1997
Receiving Date: 10/22/97
Sample Type: Sludge
Project No: NA
Project Location: Lovington, NM

Extraction Date: 11/03/97
Analysis Date: 11/05/97
Sampling Date: 10/21/97
Sample Condition: Intact & Cool
Sample Received by: RP
Project Name: NA

T84071/7704001

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	De-Salter Sludge	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	81	*150	7	101
1,4-Dichlorobenzene	7.5	0.05	ND	93	9	39	116
o-Cresol	200.0	0.05	ND	74	1	84	93
m,p-Cresol	200.0	0.05	ND	93	1	64	116
Total Cresol	200.0	0.05	ND	---	---	---	---
Hexachloroethane	3.0	0.05	ND	86	3	30	108
Nitrobenzene	2.0	0.05	ND	86	15	49	108
Hexachlorobutadiene	0.5	0.05	ND	73	20	26	91
2,4,6-Trichlorophenol	2.0	0.05	ND	78	10	55	98
2,4,5-Trichlorophenol	400.0	0.05	ND	75	7	53	94
2,4-Dinitrotoluene	0.13	0.05	ND	91	8	62	114
2,4-D	10.0	0.05	ND	65	14	24	81
Hexachlorobenzene	0.13	0.05	ND	89	1	67	111
2,4,5-TP	1.0	0.05	ND	94	13	45	118
Pentachlorophenol	100.0	0.05	ND	84	2	79	105

***NOTE: RPD Out of Limits.**
****NOTE: Surrogate recovery out of standard range.**

ND - Not Detected

Surrogates	**% RECOVERY**
2-Fluorophenol	**15
Phenol-d6	41
Nitrobenzene-d5	40
2-Fluorobiphenyl	**41
2,4,6-Tribromophenol	26
Terphenyl-d14	46

Methods: EPA SW 846-1311, 8270.
CHEMIST: RP/HW

Director, Dr. Blair Leftwich

11-12-97
DATE

TRACE ANALYSIS, INC.
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ANALYTICAL REPORT

CLIENT NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

SAMPLE NO. : 7704001
INVOICE NO.: TE0082
REPORT DATE: 11-12-97
REVIEWED BY:
PAGE : 1 OF 1

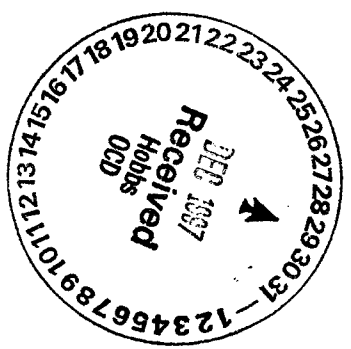
CLIENT SAMPLE ID : DeSalter Sludge
SAMPLE TYPE .....: Sludge
SAMPLED BY .....: B. Madul
SUBMITTED BY ....: D. Moore
SAMPLE SOURCE ...: Lovington NM

AUTHORIZED BY : D. Moore
CLIENT P.O. : --
SAMPLE DATE ...: 10-21-97
SUBMITTAL DATE : 10-22-97
EXTRACTION DATE: --

Inorganic Non-Metals-Solids

D A T A T A B L E

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Flash Point .....:	>180	degrees F	N/A	10-31-97	SW-1010	A. Donohue
Corrosivity .....:	-		+/-	10-30-97	SW-9045 C	A. Donohue



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ANALYTICAL REPORT

CLIENT NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

SAMPLE NO. : 7704002
INVOICE NO.: TE0082
REPORT DATE: 10-30-97
REVIEWED BY:
PAGE : 1 OF 1

Received
DEC 1997
Hobbs OCD

CLIENT SAMPLE ID : Hydrocarbon Cont. Soil
SAMPLE TYPE .....: Sludge
SAMPLED BY .....: B. Madul
SUBMITTED BY ....: D. Moore
SAMPLE SOURCE ...: Lovington NM

AUTHORIZED BY : D. Moore
CLIENT P.O. : --
SAMPLE DATE ...: 10-21-97
SUBMITTAL DATE : 10-22-97
EXTRACTION DATE: --

TCLP Metals

D A T A T A B L E

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Arsenic (TCLP) .....:	<0.050	mg/L	0.050	10-28-97	SW846 7061	N. Munir
Barium (TCLP) .....:	<5.0	mg/L	5.0	10-29-97	SW846 7080A	N. Munir
Cadmium (TCLP) .....:	<0.25	mg/L	0.25	10-28-97	SW846 7130	N. Munir
Chromium (TCLP) .....:	<0.50	mg/L	0.50	10-28-97	SW846 7190	N. Munir
Lead (TCLP) .....:	<0.75	mg/L	0.75	10-28-97	SW846 7420	N. Munir
Mercury (TCLP) .....:	<0.010	mg/L	0.010	10-24-97	SW846 7471A	N. Munir
Selenium (TCLP) .....:	<0.050	mg/L	0.050	10-28-97	SW846 7741A	N. Munir
Silver (TCLP) .....:	<0.25	mg/L	0.25	10-28-97	SW846 7760A	N. Munir

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MANAGING DIRECTOR

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ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Darrell Moore
501 E. Main
Artesia NM 88210

Date: Nov 13, 1997
Date Rec: 10/25/97
Project: N/A
Proj Name: N/A
Proj Loc: Lovington

Lab Receiving # : 9710000440
Sampling Date: 10/21/97
Sample Condition: Intact and Cool
Sample Received By: ML

TCLP Vol in Sludge (mg/L)	EPA Limit	Reporting Limit	Method Blank	T84072 H.Carbon Cont.	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	105	9	78	105
1,1-Dichloroethene	0.7	0.05	ND	ND	101	9	87	101
Methyl Ethyl Ketone	200.0	0.50	ND	ND	93	1	104	93
Chloroform	6.0	0.05	ND	ND	104	3	103	104
1,2-Dichloroethane	0.5	0.05	ND	ND	112	7	103	112
Benzene	0.5	0.05	ND	ND	100	4	97	100
Carbon Tetrachloride	0.5	0.05	ND	ND	118	7	112	118
Trichloroethene	0.5	0.05	ND	ND	98	5	97	98
Tetrachloroethane	0.7	0.05	ND	ND	94	5	93	94
Chlorobenzene	100.0	0.05	ND	ND	98	4	93	98
1,4-Dichlorobenzene	7.5	0.05	ND	ND	100	4	94	100

	% RECOVERY
Dibromofluoromethane	91
Toluene-d8	95
4-Bromofluorobenzene	92

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	10/28/97	EPA 8260	10/29/97	RW	100 ea	100 ea

Director, Dr. Blair Leftwich

11-13-97
Date

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Lubbock, Texas 79424
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ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Darrell Moore
501 E. Main
Artesia, NM 88210

November 10, 1997
Receiving Date: 10/22/97
Sample Type: Sludge
Project No: NA
Project Location: Lovington, NM

Extraction Date: 11/03/97
Analysis Date: 11/05/97
Sampling Date: 10/21/97
Sample Condition: Intact & Cool
Sample Received by: RP
Project Name: NA

T84072/7704002

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	Hydrocarbon Cont. Soil	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	81	*150	7	101
1,4-Dichlorobenzene	7.5	0.05	ND	93	9	39	116
o-Cresol	200.0	0.05	ND	74	1	84	93
m,p-Cresol	200.0	0.05	ND	93	1	64	116
Total Cresol	200.0	0.05	ND	---	---	---	---
Hexachloroethane	3.0	0.05	ND	86	3	30	108
Nitrobenzene	2.0	0.05	ND	86	15	49	108
Hexachlorobutadiene	0.5	0.05	ND	73	20	26	91
2,4,6-Trichlorophenol	2.0	0.05	ND	78	10	55	98
2,4,5-Trichlorophenol	400.0	0.05	ND	75	7	53	94
2,4-Dinitrotoluene	0.13	0.05	ND	91	8	62	114
2,4-D	10.0	0.05	ND	65	14	24	81
Hexachlorobenzene	0.13	0.05	ND	89	1	67	111
2,4,5-TP	1.0	0.05	ND	94	13	45	118
Pentachlorophenol	100.0	0.05	ND	84	2	79	105

***NOTE: RPD Out of Limits.**
****NOTE: Surrogate recovery out of standard range.**

ND - Not Detected

Surrogates	**% RECOVERY**
2-Fluorophenol	**13
Phenol-d6	26
Nitrobenzene-d5	54
2-Fluorobiphenyl	50
2,4,6-Tribromophenol	49
Terphenyl-d14	97

Methods: EPA SW 846-1311, 8270.
CHEMIST: RP/HW

Director, Dr. Blair Leftwich

11-10-97
DATE

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ANALYTICAL REPORT

CLIENT NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

SAMPLE NO. : 7704002
INVOICE NO.: TE0082
REPORT DATE: 11-12-97
REVIEWED BY:
PAGE : 1 OF 1

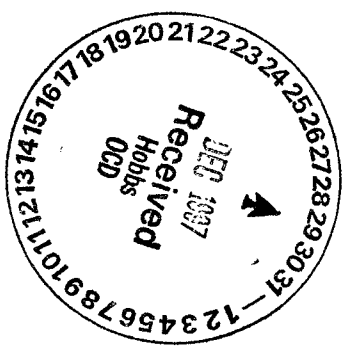
CLIENT SAMPLE ID : Hydrocarbon Cont. Soil
SAMPLE TYPE .....: Sludge
SAMPLED BY .....: B. Madul
SUBMITTED BY ....: D. Moore
SAMPLE SOURCE ...: Lovington NM

AUTHORIZED BY : D. Moore
CLIENT P.O. : --
SAMPLE DATE ...: 10-21-97
SUBMITTAL DATE : 10-22-97
EXTRACTION DATE: --

Inorganic Non-Metals-Solids

D A T A T A B L E

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Flash Point .....:	>180	degrees F	N/A	10-31-97	SW-1010	A. Donohue
Corrosivity .....:	-		+/-	10-30-97	SW-9045 C	A. Donohue



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ANALYTICAL REPORT

CLIENT NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

SAMPLE NO. : 7703999
INVOICE NO.: TE0082
REPORT DATE: 10-30-97
REVIEWED BY:
PAGE : 1 OF 1

CLIENT SAMPLE ID : Flare Line Sludge
SAMPLE TYPE .....: Sludge
SAMPLED BY .....: B. Madul
SUBMITTED BY ....: D. Moore
SAMPLE SOURCE ...: Lovington NM

AUTHORIZED BY : D. Moore
CLIENT P.O. : --
SAMPLE DATE ...: 10-21-97
SUBMITTAL DATE : 10-22-97
EXTRACTION DATE: --

TCLP Metals

D A T A T A B L E

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Arsenic (TCLP)	<0.050	mg/L	0.050	10-28-97	SW846 7061	N. Munir
Barium (TCLP)	<5.0	mg/L	5.0	10-29-97	SW846 7080A	N. Munir
Cadmium (TCLP)	<0.25	mg/L	0.25	10-28-97	SW846 7130	N. Munir
Chromium (TCLP)	<0.50	mg/L	0.50	10-28-97	SW846 7190	N. Munir
Lead (TCLP)	<0.75	mg/L	0.75	10-28-97	SW846 7420	N. Munir
Mercury (TCLP)	<0.010	mg/L	0.010	10-24-97	SW846 7471A	N. Munir
Selenium (TCLP)	<0.050	mg/L	0.050	10-28-97	SW846 7741A	N. Munir
Silver (TCLP)	<0.25	mg/L	0.25	10-28-97	SW846 7760A	N. Munir

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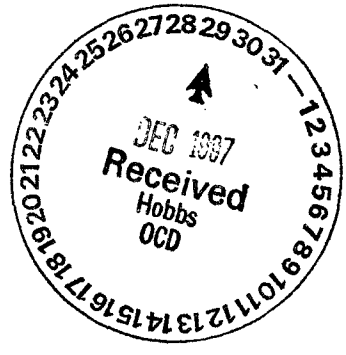
ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Darrell Moore
501 E. Main
Artesia NM 88210

Date: Nov 13, 1997
Date Rec: 10/25/97
Project: N/A
Proj Name: N/A
Proj Loc: Lovington

Lab Receiving # : 9710000440
Sampling Date: 10/21/97
Sample Condition: Intact and Cool
Sample Received By: ML

TCLP Vol in Sludge (mg/L)	EPA Limit	Reporting Limit	Method Blank	T84069 Flare Line	QC	RPD	%EA	%EA
Vinyl Chloride	0.2	0.05	ND	ND	105	9	78	105
1,1-Dichloroethene	0.7	0.05	ND	ND	101	9	87	101
Methyl Ethyl Ketone	200.0	0.50	ND	ND	93	1	104	93
Chloroform	6.0	0.05	ND	ND	104	3	103	104
1,2-Dichloroethane	0.5	0.05	ND	ND	112	7	103	112
Benzene	0.5	0.05	ND	ND	100	4	97	100
Carbon Tetrachloride	0.5	0.05	ND	ND	118	7	112	118
Trichloroethene	0.5	0.05	ND	ND	98	5	97	98
Tetrachloroethane	0.7	0.05	ND	ND	94	5	93	94
Chlorobenzene	100.0	0.05	ND	ND	98	4	93	98
1,4-Dichlorobenzene	7.5	0.05	ND	ND	100	4	94	100

	% RECOVERY
Dibromofluoromethane	92
Toluene-d8	95
4-Bromofluorobenzene	90



TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	10/28/97	EPA 8260	10/29/97	RW	100 ea	100 ea

Director, Dr. Blair Leftwich

11-13-97
Date

6701 Aberdeen Avenue
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ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Darrell Moore
501 E. Main
Artesia, NM 88210

November 10, 1997
Receiving Date: 10/22/97
Sample Type: Sludge
Project No: NA
Project Location: Lovington, NM

Extraction Date: 11/03/97
Analysis Date: 11/05/97
Sampling Date: 10/21/97
Sample Condition: Intact & Cool
Sample Received by: RP
Project Name: NA

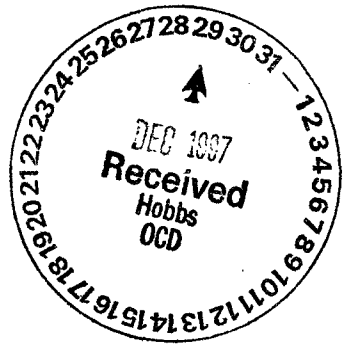
T84069/7703999

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	Flare Line Sludge	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	81	*150	7	101
1,4-Dichlorobenzene	7.5	0.05	ND	93	9	39	116
o-Cresol	200.0	0.05	ND	74	1	84	93
m,p-Cresol	200.0	0.05	ND	93	1	64	116
Total Cresol	200.0	0.05	ND	---	---	---	---
Hexachloroethane	3.0	0.05	ND	86	3	30	108
Nitrobenzene	2.0	0.05	ND	86	15	49	108
Hexachlorobutadiene	0.5	0.05	ND	73	20	26	91
2,4,6-Trichlorophenol	2.0	0.05	ND	78	10	55	98
2,4,5-Trichlorophenol	400.0	0.05	ND	75	7	53	94
2,4-Dinitrotoluene	0.13	0.05	ND	91	8	62	114
2,4-D	10.0	0.05	ND	65	14	24	81
Hexachlorobenzene	0.13	0.05	ND	89	1	67	111
2,4,5-TP	1.0	0.05	ND	94	13	45	118
Pentachlorophenol	100.0	0.05	ND	84	2	79	105

***NOTE: RPD Out of Limits.**
****NOTE: Surrogate recovery out of standard range.**

ND - Not Detected

Surrogates	**% RECOVERY**
2-Fluorophenol	**17
Phenol-d6	32
Nitrobenzene-d5	70
2-Fluorobiphenyl	61
2,4,6-Tribromophenol	56
Terphenyl-d14	94



Methods: EPA SW 846-1311, 8270.
CHEMIST: RP/HW

Director, Dr. Blair Leftwich

11-10-97
DATE

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ANALYTICAL REPORT

CLIENT NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

SAMPLE NO. : 7703999
INVOICE NO.: TE0082
REPORT DATE: 11-12-97
REVIEWED BY:
PAGE : 1 OF 1

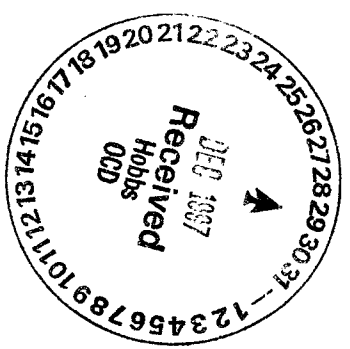
CLIENT SAMPLE ID : Flare Line Sludge
SAMPLE TYPE .....: Sludge
SAMPLED BY .....: B. Madul
SUBMITTED BY ....: D. Moore
SAMPLE SOURCE ...: Lovington NM

AUTHORIZED BY : D. Moore
CLIENT P.O. : --
SAMPLE DATE ...: 10-21-97
SUBMITTAL DATE : 10-22-97
EXTRACTION DATE: --

Inorganic Non-Metals-Solids

D A T A T A B L E

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Flash Point .....:	>180	degrees F	N/A	10-31-97	SW-1010	A. Donohue
Corrosivity .....:	-		+/-	10-30-97	SW-9045 C	A. Donohue



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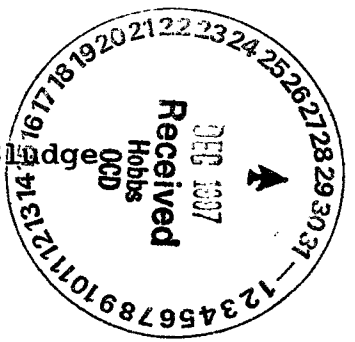
ANALYTICAL REPORT

CLIENT NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

SAMPLE NO. : 7703997
INVOICE NO.: TE0082
REPORT DATE: 10-30-97
REVIEWED BY:
PAGE : 1 OF 1



CLIENT SAMPLE ID : Cooling Tower Sludge
SAMPLE TYPE .....: Sludge
SAMPLED BY .....: B. Madul
SUBMITTED BY ....: D. Moore
SAMPLE SOURCE ...: Lovington NM

AUTHORIZED BY : D. Moore
CLIENT P.O. : --
SAMPLE DATE ...: 10-21-97
SUBMITTAL DATE : 10-22-97
EXTRACTION DATE: --

TCLP Metals

D A T A T A B L E

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Arsenic (TCLP) .....:	0.095	mg/L	0.050	10-28-97	SW846 7061	N. Munir
Barium (TCLP) .....:	<5.0	mg/L	5.0	10-29-97	SW846 7080A	N. Munir
Cadmium (TCLP) .....:	<0.25	mg/L	0.25	10-28-97	SW846 7130	N. Munir
Chromium (TCLP) .....:	<0.50	mg/L	0.50	10-28-97	SW846 7190	N. Munir
Lead (TCLP) .....:	<0.75	mg/L	0.75	10-28-97	SW846 7420	N. Munir
Mercury (TCLP) .....:	<0.010	mg/L	0.010	10-24-97	SW846 7471A	N. Munir
Selenium (TCLP) .....:	<0.050	mg/L	0.050	10-28-97	SW846 7741A	N. Munir
Silver (TCLP) .....:	<0.25	mg/L	0.25	10-29-97	SW846 7760A	N. Munir

ANALYTICAL RESULT(S) REPORTED HEREIN APPLY ONLY TO THE SAMPLE(S) TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY.

(1) Copy to Client

MANAGING DIRECTOR

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Darrell Moore
501 E. Main
Artesia NM 88210

Date: Nov 13, 1997
Date Rec: 10/25/97
Project: N/A
Proj Name: N/A
Proj Loc: Lovington

Lab Receiving # : 9710000440
Sampling Date: 10/21/97
Sample Condition: Intact and Cool
Sample Received By: ML

TCLP Vol in Sludge (mg/L)	EPA Limit	Reporting Limit	Method Blank	T84067 Cooling Tower	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	105	9	78	105
1,1-Dichloroethene	0.7	0.05	ND	ND	101	9	87	101
Methyl Ethyl Ketone	200.0	0.50	ND	ND	93	1	104	93
Chloroform	6.0	0.05	ND	ND	104	3	103	104
1,2-Dichloroethane	0.5	0.05	ND	ND	112	7	103	112
Benzene	0.5	0.05	ND	ND	100	4	97	100
Carbon Tetrachloride	0.5	0.05	ND	ND	118	7	112	118
Trichloroethene	0.5	0.05	ND	ND	98	5	97	98
Tetrachloroethane	0.7	0.05	ND	ND	94	5	93	94
Chlorobenzene	100.0	0.05	ND	ND	98	4	93	98
1,4-Dichlorobenzene	7.5	0.05	ND	ND	100	4	94	100

	% RECOVERY
Dibromofluoromethane	92
Toluene-d8	95
4-Bromofluorobenzene	90

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	10/28/97	EPA 8260	10/29/97	RW	100 ea	100 ea

Director, Dr. Blair Leftwich

11-13-97
Date

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Darrell Moore
501 E. Main
Artesia, NM 88210

November 10, 1997
Receiving Date: 10/22/97
Sample Type: Sludge
Project No: NA
Project Location: Lovington, NM

Extraction Date: 11/03/97
Analysis Date: 11/05/97
Sampling Date: 10/21/97
Sample Condition: Intact & Cool
Sample Received by: RP
Project Name: NA

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T84067/7703997 Cooling Tower Sludge	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	81	*150	7	101
1,4-Dichlorobenzene	7.5	0.05	ND	93	9	39	116
o-Cresol	200.0	0.05	ND	74	1	84	93
m,p-Cresol	200.0	0.05	ND	93	1	64	116
Total Cresol	200.0	0.05	ND	---	---	---	---
Hexachloroethane	3.0	0.05	ND	86	3	30	108
Nitrobenzene	2.0	0.05	ND	86	15	49	108
Hexachlorobutadiene	0.5	0.05	ND	73	20	26	91
2,4,6-Trichlorophenol	2.0	0.05	ND	78	10	55	98
2,4,5-Trichlorophenol	400.0	0.05	ND	75	7	53	94
2,4-Dinitrotoluene	0.13	0.05	ND	91	8	62	114
2,4-D	10.0	0.05	ND	65	14	24	81
Hexachlorobenzene	0.13	0.05	ND	89	1	67	111
2,4,5-TP	1.0	0.05	ND	94	13	45	118
Pentachlorophenol	100.0	0.05	ND	84	2	79	105

***NOTE: RPD Out of Limits.**
****NOTE: Surrogate recovery out of standard range.**

ND - Not Detected

Surrogates	**% RECOVERY**
2-Fluorophenol	**19
Phenol-d6	40
Nitrobenzene-d5	62
2-Fluorobiphenyl	52
2,4,6-Tribromophenol	52
Terphenyl-d14	90

Methods: EPA SW 846-1311, 8270.
CHEMIST: RP/HW

11-10-97

Director, Dr. Blair Leftwich

DATE

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL REPORT

CLIENT NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

SAMPLE NO. : 7703997
INVOICE NO.: TE0082
REPORT DATE: 11-12-97
REVIEWED BY:
PAGE : 1 OF 1

CLIENT SAMPLE ID : Cooling Tower Sludge
SAMPLE TYPE .....: Sludge
SAMPLED BY .....: B. Madul
SUBMITTED BY ....: D. Moore
SAMPLE SOURCE ...: Lovington NM

AUTHORIZED BY : D. Moore
CLIENT P.O. : --
SAMPLE DATE ...: 10-21-97
SUBMITTAL DATE : 10-22-97
EXTRACTION DATE: --

Inorganic Non-Metals-Solids

D A T A T A B L E

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Flash Point .....:	>180	degrees F	N/A	10-30-97	SW-1010	A. Donohue
Corrosivity .....:	-		+/-	10-30-97	SW-9045 C	A. Donohue

Received
Hobbs
OCD
NOV 1997

(1) Copy to Client

ANALYTICAL RESULT(S) REPORTED HEREIN APPLY ONLY TO THE SAMPLE(S) TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY.

MANAGING DIRECTOR

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Darrell Moore
501 E. Main
Artesia, NM 88210

November 10, 1997
Receiving Date: 10/22/97
Sample Type: Sludge
Project No: NA
Project Location: Lovington, NM

Extraction Date: 10/28/97
Analysis Date: 10/28/97
Sampling Date: 10/21/97
Sample Condition: Intact & Cool
Sample Received by: RP
Project Name: NA

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)
	EPA LIMIT =	---	500	250
T84067/7703997	Cooling Tower Sludge	Non-reactive	130	30
T84068/7703998	T-101 (Crude Tower) Sludge	Non-reactive	<10	<2.5
T84069/7703999	Flare Line Sludge	Non-reactive	<10	<2.5
T84070/7704000	Shell Bottom Sludge	Non-reactive	<10	<2.5
T84071/7704001	De-Salter Sludge	Non-reactive	<10	<2.5
T84072/7704002	Hydrocarbon Cont. Soil	Non-reactive	<10	<2.5
QC	Quality Control	---	---	---
RPD		0	0	0
% Extraction Accuracy		---	---	---
% Instrument Accuracy		---	---	---

METHODS: EPA SW 846-2.1.3.
CHEMIST: JG

BL

Director, Dr. Blair Leftwich

11-10-97

DATE

TraceAnalysis, Inc.

6701 Aberdeen Avenue Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: Darrell Moore
Phone #: 505-748-3311
FAX #: 505-748-9077
Company Name & Address: Navajo Refining Co.
Project #:
Project Name :
Project Location: Lovington NM
Sampler Signature: Bryan Mackey

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME	BTEX, MTBE	TPH	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	8240 / 8260	8270
770 3997	Cooling Tower Sludge	1	1L				X			X		10/22/97	11:00				X	X	X	X		
3998	T-101 (Crude Tower) Sludge	"	"				"			"		"	11:15				"	"	"	"		
3999	Flare Line Sludge	"	"				"			"		"	11:30				"	"	"	"		
4000	Shell Bottom Sludge	"	"				"			"		"	11:45				"	"	"	"		
4001	DeSalter Sludge	"	"				"			"		"	12:00				"	"	"	"		
770 4002	Hydrocarbon Cont. Soil	2	"				"			"		"	12:15				"	"	"	"		

Turn around # of days	Fax ASAP	Hold

Received ODD Hobbs NOV 1997

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Darrell Moore	10/22/97	11:30			
Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received at Laboratory by:	Date:	Time:
			[signature]	10/22/97	11:30

REMARKS
Received on Ice - Hot

Martyne Kieling

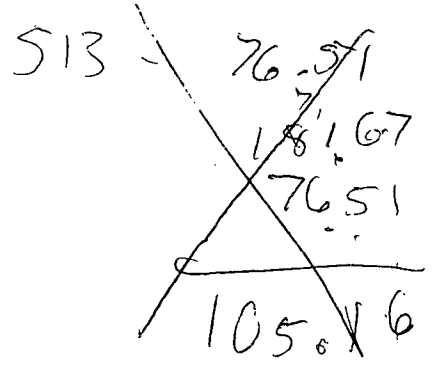
From: Price, Wayne
Sent: Friday, January 16, 1998 3:26 PM
To: Gum, Tim
Cc: Martyne Kieling
Subject: C-138's for CRI/Navajo Artesia

Dear Tim,

I am dropping in the mail today the following C-138's for your approval. Please forward to Martyne.

Thanks!

vac tower scale-20 yds ✓
sandfilter- 10 yds ✓
blast sand- 5 yds ✓
soils- 10 yds ✓
coked trays- 20 yds ✓
cermic support- 40 yds ✓



District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
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Santa Fe, New Mexico 87505
(505) 827-7131

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JAN 1998
RECEIVED
OCD - ARTESIA

JAN ... 98
... DIVISION

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controled Recovery, Inc.	6. Transporter Unknown
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 East Main	Artesia, New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajor Refining Artesia facility. The petroleum refining - vacuum towere scale was generated by removing the material from the vacuum tower. I have included a certificate of waste and a chain of custody.

JAN 1998
Received
Hobbs
OCD

Estimated Volume 20 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Office Manager DATE: 01/13/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env Engr DATE: 1/16/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 1/27/98

1998
Received
Hobbs
OCD

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO.

Sources: PETROLEUM REFINING - VACUUM TOWER SCALE

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING CO. concur with the status of the waste from the subject site.

Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 12-23-97

District I - (505) 393-6161
P.O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division

2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-1
Originated 8/

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to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controled Recovery, Inc.	6. Transporter Unknown
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 East Main	Artesia, New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajor Refining Artesia facility. The petroleum refining - sandfilter was generated by removing the material from the fluid catalytic cracker unit. I have included a certificate of waste and a chain of custody.

JAN 1998
Received
Hobbs
OCD

Estimated Volume 10 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Office Manager DATE: 01/13/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Envir Engr DATE: 1/16/98

APPROVED BY: Martyn J Kilby TITLE: Env Geologist DATE: 1/27/98

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

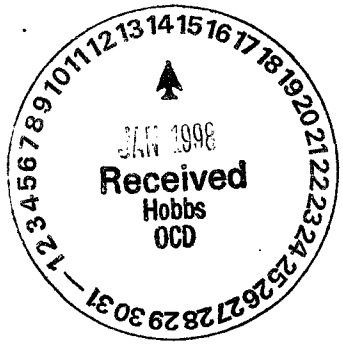
Originating Location: NAVAJO REFINING Co.

Sources: PETROLEUM REFINING - SAND FILTER

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING Co. concur with the status of the waste from the subject site.



Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 12-23-97

District I - (505) 393-6161
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Artesia, NM 88210
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District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controled Recovery, Inc.	6. Transporter Unknown ?
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 East Main	Artesia, New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajor Refining Artesia facility. The petroleum refining - blastsand was generated by blastsand used to clean rust and debris off tanks befor piming and painting. I have included a certificate of waste and a chain of custody.

JAN 1998
Received
Hobbs
OCD

Estimated Volume 5 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Office Manager DATE: 01/13/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env Engr PE 1/27 DATE: 1/16/98

APPROVED BY: Martyn J Kuly TITLE: Env Geologist DATE: 1/27/98

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO.

Sources: PETROLEUM REFINING – BLAST SAND

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING CO. concur with the status of the waste from the subject site.

Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 12-23-97

District I - (505) 393-6161
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1000 Rio Brazos Road
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Energy Minerals and Natural Resources Department
Oil Conservation Division
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REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controled Recovery, Inc.	6. Transporter Unknown
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 East Main	Artesia, New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajor Refining Artesia facility. The petroleum refining - hydrocarbon contaminated soilwas generated by cleanup of spills to the bare ground during a turn around. I have included a certificate of waste and a chain of custody.

JAN 1998
Received
Hobbs
OCD

Estimated Volume 10yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Office Manager DATE: 01/13/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env Engr 1/27 DATE: 1/16/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 1/27/98

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO.

Sources: PETROLEUM REFINING - HYDROCARBON CONTAMINATED SOIL

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING CO. concur with the status of the waste from the subject site.

Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN
ARTESIA, NM 88210

Signature Bryan Madrid

Date 12-23-97

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Oil Conservation Division

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(505) 827-7131

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REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Verbal Approval Received: Yes ☐ No ☐	4. Generator Navajo Refining 5. Originating Site Artesia Facility
2. Management Facility Destination Controled Recovery, Inc.	6. Transporter Unknown
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 East Main	Artesia, New Mexico

9. Circle One:

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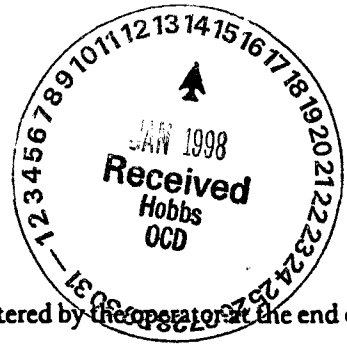
(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajor Refining Artesia facility. The petroleum refining - coked tryas was generated by replacing the coke trays covered with coke during a turnaround. I have included a certificate of waste and a chain of custody.



Estimated Volume 20 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Office Manager DATE: 01/13/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR DATE: 1/16/98

APPROVED BY: _____ TITLE: Env. Geologist DATE: 1/27/98

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO.

Sources: PETROLEUM REFINING- COKED TRAYS

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING CO. concur with the status of the waste from the subject site.

Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 12-23-97

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controled Recovery, Inc.	6. Transporter Unknown
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 East Main	Artesia, New Mexico

9. Circle One:

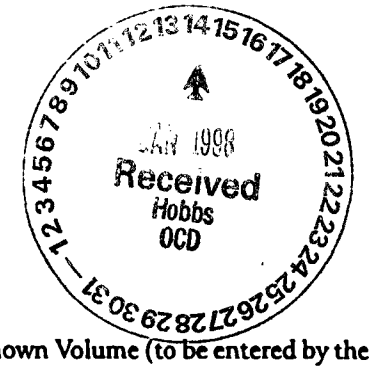
A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajor Refining Artesia facility. The petroleum refining - ceramic support media was generated by cleaning the ceramic packing from the contactor and coalescer. I have included a certificate of waste and a chain of custody.



Estimated Volume 40 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Office Manager DATE: 01/13/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env. Engr. 1/27 DATE: 1/16/98

APPROVED BY: _____ TITLE: Env. Geologist DATE: 1/27/98

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO.

Sources: PETROLEUM REFINING - CERAMIC SUPPORT MEDIA

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING CO. concur with the status of the waste from the subject site.

Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 12-23-97

TELEPHONE
(505) 748-3311

EASYLINK
62905278

REFINING COMPANY

501 EAST MAIN STREET • P. O. BOX 159
ARTESIA, NEW MEXICO 88211-0159

FAX
(505) 746-6410 ACCTG
(505) 746-6155 EXEC
(505) 748-9077 ENGR
(505) 746-4438 P / L

December 23, 1997

Ken Marsh
CRI Inc.
P.O. Box 369
Hobbs, NM 88241

Dear Mr. Marsh:

A recent turnaround here at Navajo produced various wastes that I would like to get profiled into your facility. Below you will find a brief description along with the amount and type of container that will be used to transport these wastes to your facility.

In our vacuum tower, W-62, boiling points and heat are used to separate treated crude into products such as asphalt and gas oils. Over time, scale and coke build up on the inside walls of the tower. Approximately 20 yards of this scale was chipped out of the tower and put into 55 gallon drums. Before shipment, these drums will be emptied into a 20 yard roll off bin.

All pneumatic control devices, such as flow meters and control valves, require dry air to operate. At our Fluid Catalytic Cracker Unit, air from a compressor is dried by sending it through our drying system. Part of this system includes sending air through drums D-526 and D-521. These desiccant filled drums trap moisture and drop it to the bottom of the drums where it is then drained to the sewer. Dry air then continues on for further treatment. After a change out, approximately 10 yards of desiccant sandfilter was placed into 55 gallon drums. Before shipment, it will be transferred into a 20 yard roll off bin.

Most sewer boxes at our plant contain sewer inserts that catch solids such as dirt, cat fines, small bolts, etc., before they enter the sewer. During turnaround, the sludge in the inserts was cleaned out daily and put into a 20 yard roll off bin. Approximately 10 yards of sewer insert sludge was accumulated and is ready for shipment.

Blast sand was used to clean rust and debris off tanks before priming and painting. Approximately five yards of used blast sand was put into a 20 yard roll off bin and is ready for shipment.

During turnaround, spills to the bare ground occurred as a result of draining hoses, fueling up air compressors with diesel, cleaning asphalt pumps, etc. Following turnaround, these spills were cleaned up with approximately 10 yards of hydrocarbon contaminated soil dug up and placed into a 20 yard roll off bin.

In our crude tower, W-16, boiling points and heat are used to separate raw crude into products such as gas oils and diesel. Trays at various levels of the tower capture the different products and thus aid in separation. Over time these trays weaken with use and also become covered with a layer of coke. During turnaround, a new set of trays was installed with approximately 20 yards of old trays put into a 20 yard roll off bin.

In our fuel gas treater, sour alky feed is passed through the alky liquid feed contactor, W-766, and the sweet alky feed coalescer, D-769. The contactor and coalescer are filled with a ceramic packing that extracts amine and moisture from the alky feed. The amine and moisture are sent to the amine unit and the sweet alky feed is sent to the alky unit. A change out of this tower and drum produced approximately 40 yards of ceramic packing waste that will be sent in two 20 yard roll off bins.

A sample of each of the above wastes was taken and sent to Trace Analysis Incorporated. Enclosed you will find all analyses along with a Certificate of Waste Status for each media. Since TCLP analyses show each waste to be non-hazardous, we would like to send these wastes to your facility as soon as possible.

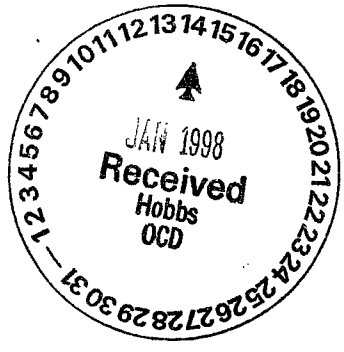
If you have any questions, I can be reached at (505) 748-3311. Thank you for your time in this matter.

Sincerely,

Bryan Madrid

Bryan Madrid
Environmental Specialist

Encl.



TRACEANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

December 08, 1997
Receiving Date: 11/24/97
Sample Type: Sludge
Project No: NA
Project Location: NA

Extraction Date: 12/03/97
Analysis Date: 12/03/97
Sampling Date: 11/24/97
Sample Condition: I & C
Sample Received by: RP
Project Name: NA

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)
	EPA LIMIT =	---	500	250	---	<2 >12.5
T86396/7704412	Vacuum Tower Scale	Non-reactive	<10	<2.5	Non-corrosive	6.7
T86399/7704415	Sewer Inserts	Non-reactive	280	80	Non-corrosive	7.3
T86400/7704416	Exchanger Sludge	Non-reactive	<10	<2.5	Non-corrosive	6.6
T86405/7704421	Flare K.O. Drum Scale	Non-reactive	<10	<2.5	Non-corrosive	6.9
T86407/7704423	Depropanizer Scale	Non-reactive	<10	<2.5	Non-corrosive	4.4
T86408/7704424	Cooling Tower Sludge	Non-reactive	<10	<2.5	Non-corrosive	7.8
QC	Quality Control	---	---	---	---	7.0
RPD		0	0	9	0	0
% Extraction Accuracy		---	---	108	---	---
% Instrument Accuracy		---	---	106	---	100

METHODS: EPA SW 846-2.1.3, 2.1.2.
CHEMIST: JG

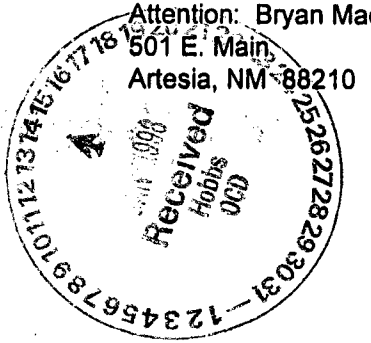
Director, Dr. Blair Leftwich

12-8-97
DATE

Received
Hobbs
OCD

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210



December 08, 1997
Receiving Date: 11/24/97
Sample Type: Catalyst
Project No: NA
Project Location: NA

Extraction Date: 12/03/97
Analysis Date: 12/03/97
Sampling Date: 11/24/97
Sample Condition: I & C
Sample Received by: RP
Project Name: NA

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)
	EPA LIMIT =	---	500	250	---	<2 >12.5
T86397/7704413	Ceramic Support Media	Non-reactive	<10	<2.5	Non-corrosive	7.1
T86398/7704414	Sand Filter	Non-reactive	<10	<2.5	Non-corrosive	8.0
T86403/7704419	Desulfurization Catalyst	Non-reactive	<10	<2.5	Non-corrosive	5.2
T86404/7704420	Bauxite Dryer Media	Non-reactive	<10	<2.5	Non-corrosive	5.8
QC	Quality Control	---	---	---	---	7.0
RPD		0	0	9	0	0
% Extraction Accuracy		---	---	108	---	---
% Instrument Accuracy		---	---	106	---	100

METHODS: EPA SW 846-2.1.3, 2.1.2.
CHEMIST: JG

Director, Dr. Blair Leftwich

12-8-97
DATE

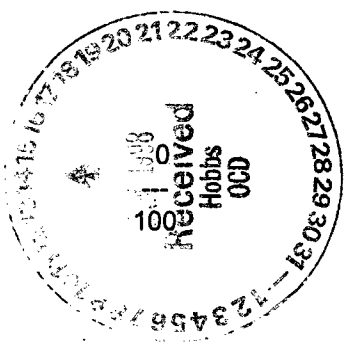
TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

December 08, 1997
Receiving Date: 11/24/97
Sample Type: Soil
Project No: NA
Project Location: NA

Extraction Date: 12/03/97
Analysis Date: 12/03/97
Sampling Date: 11/24/97
Sample Condition: I & C
Sample Received by: RP
Project Name: NA

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)
	EPA LIMIT =	---	500	250	---	<2 >12.5
T86401/7704417	Blast Sand	Non-reactive	<10	<2.5	Non-corrosive	6.9
T86402/7704418	Hydrocarbon Contaminated Soil	Non-reactive	<10	<2.5	Non-corrosive	4.9
QC	Quality Control	---	---	---	---	7.0
RPD		0	0	9	0	0
% Extraction Accuracy		---	---	108	---	---
% Instrument Accuracy		---	---	106	---	100



METHODS: EPA SW 846-2.1.3, 2.1.2.
CHEMIST: JG

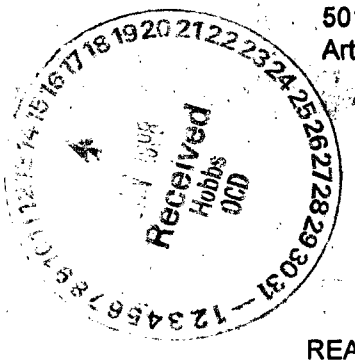
Director, Dr. Blair Leftwich

12-8-97
DATE

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

December 08, 1997
Receiving Date: 11/24/97
Sample Type: Solid
Project No: NA
Project Location: NA



Extraction Date: 12/03/97
Analysis Date: 12/03/97
Sampling Date: 11/24/97
Sample Condition: I & C
Sample Received by: RP
Project Name: NA

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)
	EPA LIMIT =	---	500	250	---	<2 >12.5
T86406/7704422	Coked Trays	Non-reactive	<10	<2.5	Non-corrosive	6.1
QC	Quality Control	---	---	---	---	7.0
RPD		0	0	9	0	0
% Extraction Accuracy		---	---	108	---	---
% Instrument Accuracy		---	---	106	---	100

METHODS: EPA SW 846-2.1.3, 2.1.2.
CHEMIST: JG

Director, Dr. Blair Leftwich

12-8-97
DATE

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL REPORT

Client NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

Invoice No. TE0255
Report Date 12-22-97
Reviewed by
Page 1 of 1

Parameter Flash Point
Test Method SW-1010
Authorized by B. MADRID
Client P.O.

LAB NO.	CLIENT SAMPLE ID	RESULT	UNIT	DETECTION LIMIT	SAMPLE DATE	ANALYSIS DATE
7704412	VACUUM TOWER SCALE ✓	>180	degrees F	N/A	11-24-97	12-02-97
7704413	CERAMIC SUPPORT MEDIA ✓	>180	degrees F	N/A	11-24-97	12-02-97
7704414	SAND FILTER ✓	>180	degrees F	N/A	11-24-97	12-02-97
7704415	SEWER INSERTS	>180	degrees F	N/A	11-24-97	12-02-97
7704416	EXCHANGE SLUDGE	>180	degrees F	N/A	11-24-97	12-03-97
7704417	BLAST SAND ✓	>180	degrees F	N/A	11-24-97	12-03-97
7704418	HYDROCARBON CONTAM. SOIL ✓	>180	degrees F	N/A	11-24-97	12-03-97
7704419	DESULFURIZATION CATALYST	>180	degrees F	N/A	11-24-97	12-03-97
7704420	BAUXITE DRYER MEDIA	>180	degrees F	N/A	11-24-97	12-04-97
7704421	FLARE K.O. DRUM SCALE	112	degrees F	N/A	11-24-97	12-04-97
7704422	COKED TRAYS ✓	>180	degrees F	N/A	11-24-97	12-04-97
7704423	DEPROPANIZER SCALE	>180	degrees F	N/A	11-24-97	12-04-97
7704424	COOLING TOWER SLUDGE	>180	degrees F	N/A	11-24-97	12-04-97

Received
Hobbs
NM

(1) Copy to Client

ANALYTICAL RESULTS REPORTED HEREIN APPLY ONLY TO THE SAMPLES TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY.

MANAGING DIRECTOR

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL REPORT

CLIENT NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

SAMPLE NO. : 7704412
INVOICE NO.: TE0255
REPORT DATE: 12-05-97
REVIEWED BY:
PAGE : 1 OF 1

CLIENT SAMPLE ID : VACUUM TOWER SCALE
SAMPLE TYPE .....: SLUDGE
SAMPLED BY .....: B. MADRID
SUBMITTED BY ....: B. MADRID
SAMPLE SOURCE ...: --

AUTHORIZED BY : B. MADRID
CLIENT P.O. : --
SAMPLE DATE ...: 11-24-97
SUBMITTAL DATE : 11-24-97
EXTRACTION DATE: --

TCLP Metals

DATA TABLE

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Arsenic (TCLP)	0.054	mg/L	0.050	12-01-97	SW846 7061	N. Munir
Barium (TCLP)	<5.0	mg/L	5.0	12-03-97	SW846 7080A	N. Munir
Cadmium (TCLP)	<0.25	mg/L	0.25	12-02-97	SW846 7130	N. Munir
Chromium (TCLP)	<0.50	mg/L	0.50	12-03-97	SW846 7190	N. Munir
Lead (TCLP)	<0.75	mg/L	0.75	12-03-97	SW846 7420	N. Munir
Mercury (TCLP)	<0.010	mg/L	0.010	12-01-97	SW846 7471A	N. Munir
Selenium (TCLP)	0.061	mg/L	0.050	12-02-97	SW846 7741A	N. Munir
Silver (TCLP)	<0.25	mg/L	0.25	12-01-97	SW846 7760A	N. Munir

ANALYTICAL RESULT(S) REPORTED HEREIN APPLY ONLY TO THE SAMPLE(S) TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY.

(1) Copy to Client

MANAGING DIRECTOR

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Dec 08, 1997
Date Rec: 11/24/97
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9712000033
Sampling Date: 11/24/97
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Vol in Solid (mg/L)	EPA Limit	Reporting Limit	Method Blank	T86396 Vacuum Tower Scale	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	86	2	101	86
1,1-Dichloroethene	0.7	0.05	ND	ND	88	8	85	88
Methyl Ethyl Ketone	200.0	0.50	ND	ND	80	9	84	80
Chloroform	6.0	0.05	ND	ND	88	7	96	88
1,2-Dichloroethane	0.5	0.05	ND	ND	87	9	92	87
Benzene	0.5	0.05	ND	ND	87	7	94	87
Carbon Tetrachloride	0.5	0.05	ND	ND	104	5	105	104
Trichloroethene	0.5	0.05	ND	ND	87	5	97	87
Tetrachloroethane	0.7	0.05	ND	ND	83	6	96	83
Chlorobenzene	100.0	0.05	ND	ND	84	6	90	84
1,4-Dichlorobenzene	7.5	0.05	ND	ND	85	7	93	85

	% RECOVERY
Dibromofluoromethane	101
Toluene-d8	101
4-Bromofluorobenzene	99

Received
Hobbs
OCD
1998

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	12/2/97	EPA 8260	12/3/97	RW	100 ea	100 ea

Director, Dr. Blair Leftwich

12-8-97
Date

TRACE ANALYSIS, INC.
An Institute for Advanced Environmental Research and Analysis

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Dec 08, 1997
Date Rec: 11/24/97
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9712000033
Sampling Date: 11/24/97
Sample Condition: Intact and Cool
Sample Received By: VW

T86396 ✓

TCLP Semivolatiles in Solid (mg/L)	EPA Limit	Reporting Limit	Method Blank	Vacuum Tower Scale	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	ND	92	0	0	92
1,4-Dichlorobenzene	7.5	0.05	ND	ND	91	3	64	91
o-Cresol	200.0	0.05	ND	ND	93	4	110	93
m,p-Cresol	200.0	0.05	ND	ND	94	7	286	94
Hexachloroethane	3.0	0.05	ND	ND	88	4	92	88
Nitrobenzene	2.0	0.05	ND	ND	84	3	76	84
Hexachlorobutadiene	0.5	0.05	ND	ND	75	5	42	75
2,4,6-Trichlorophenol	2.0	0.05	ND	ND	90	2	85	90
2,4,5-Trichlorophenol	400.0	0.05	ND	ND	92	2	94	92
2,4-Dinitrotoluene	0.13	0.05	ND	ND	92	2	80	92
2,4-D	10.0	0.05	ND	ND	84	2	176	84
Hexachlorobenzene	0.13	0.05	ND	ND	90	4	94	90
2,4,5-TP	1.0	0.05	ND	ND	76	4	314	76
Pentachlorophenol	100.0	0.05	ND	ND	83	12	124	83

ND = Not Detected

Surrogate	% RECOVERY	Surrogate	% RECOVERY
2-Fluorophenol	70	2-Fluorobiphenyl	110
Phenol-D6	82	2,4,6-Tribromophenol	70
Nitrobenzene-d5	88	Terphenyl-d14	106

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Semi	EPA 1311	12/3/97	EPA 8270	12/5/97	RP/HW	100 ea	100 ea

Director, Dr. Blair Leftwich

Date

TRACE ANALYSIS, INC.

An Institute for Advanced Environmental Research and Analysis

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue | Lubbock, Texas 79424 | 806•794•1296 | FAX 806•794•1298

ANALYTICAL REPORT

CLIENT NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

SAMPLE NO. : 7704414
INVOICE NO.: TE0255
REPORT DATE: 12-05-97
REVIEWED BY:
PAGE : 1 OF 1

CLIENT SAMPLE ID : SAND FILTER
SAMPLE TYPE .....: CATALYST
SAMPLED BY .....: B. MADRID
SUBMITTED BY ....: B. MADRID
SAMPLE SOURCE ...: --

AUTHORIZED BY : B. MADRID
CLIENT P.O. : --
SAMPLE DATE ...: 11-24-97
SUBMITTAL DATE : 11-24-97
EXTRACTION DATE: --

Received
Hobbs
OCD

TCLP Metals

DATA TABLE

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Arsenic (TCLP) .....:	<0.050	mg/L	0.050	12-01-97	SW846 7061	N. Munir
Barium (TCLP) .....:	5.0	mg/L	5.0	12-03-97	SW846 7080A	N. Munir
Cadmium (TCLP) .....:	<0.25	mg/L	0.25	12-02-97	SW846 7130	N. Munir
Chromium (TCLP) .....:	<0.50	mg/L	0.50	12-03-97	SW846 7190	N. Munir
Lead (TCLP) .....:	<0.75	mg/L	0.75	12-03-97	SW846 7420	N. Munir
Mercury (TCLP) .....:	<0.010	mg/L	0.010	12-01-97	SW846 7471A	N. Munir
Selenium (TCLP) .....:	<0.050	mg/L	0.050	12-02-97	SW846 7741A	N. Munir
Silver (TCLP) .....:	<0.25	mg/L	0.25	12-01-97	SW846 7760A	N. Munir

ANALYTICAL RESULT(S) REPORTED HEREIN APPLY ONLY TO THE SAMPLE(S) TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY.

(1) Copy to Client

MANAGING DIRECTOR

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Dec 08, 1997
Date Rec: 11/24/97
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9712000033
Sampling Date: 11/24/97
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Vol in Solid (mg/L)	EPA Limit	Reporting Limit	Method Blank	T86398 ✓ Sandfilter	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	86	2	101	86
1,1-Dichloroethene	0.7	0.05	ND	ND	88	8	85	88
Methyl Ethyl Ketone	200.0	0.50	ND	ND	80	9	84	80
Chloroform	6.0	0.05	ND	ND	88	7	96	88
1,2-Dichloroethane	0.5	0.05	ND	ND	87	9	92	87
Benzene	0.5	0.05	ND	ND	87	7	94	87
Carbon Tetrachloride	0.5	0.05	ND	ND	104	5	105	104
Trichloroethene	0.5	0.05	ND	ND	87	5	97	87
Tetrachloroethane	0.7	0.05	ND	ND	83	6	96	83
Chlorobenzene	100.0	0.05	ND	ND	84	6	90	84
1,4-Dichlorobenzene	7.5	0.05	ND	ND	85	7	93	85

	% RECOVERY
Dibromofluoromethane	104
Toluene-d8	102
4-Bromofluorobenzene	100

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	12/2/97	EPA 8260	12/3/97	RW	100 ea	100 ea

Director, Dr. Blair Leftwich

12-8-97
Date

TRACE ANALYSIS, INC.
An Institute for Advanced Environmental Research and Analysis

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

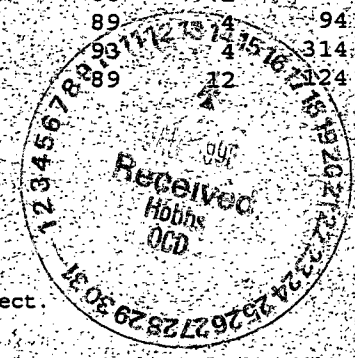
ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Dec 08, 1997
Date Rec: 11/24/97
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9712000033
Sampling Date: 11/24/97
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Semivolatiles in Solid (mg/L)	EPA Limit	Reporting Limit	Method Blank	T86398 Sandfilter	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	ND	91	0	0	115
1,4-Dichlorobenzene	7.5	0.05	ND	ND	89	3	64	114
o-Cresol	200.0	0.05	ND	ND	91	4	110	116
m,p-Cresol	200.0	0.05	ND	ND	84	7	286	118
Hexachloroethane	3.0	0.05	ND	ND	86	4	92	110
Nitrobenzene	2.0	0.05	ND	ND	88	3	76	105
Hexachlorobutadiene	0.5	0.05	ND	ND	81	5	42	94
2,4,6-Trichlorophenol	2.0	0.05	ND	ND	88	2	85	112
2,4,5-Trichlorophenol	400.0	0.05	ND	ND	89	2	94	115
2,4-Dinitrotoluene	0.13	0.05	ND	ND	90	2	80	115
2,4-D	10.0	0.05	ND	ND	68	2	176	105
Hexachlorobenzene	0.13	0.05	ND	ND	89	4	94	112
2,4,5-TP	1.0	0.05	ND	ND	93	4	314	95
Pentachlorophenol	100.0	0.05	ND	ND	89	12	124	104

ND = Not Detected



*Surrogate recovery out of standard range for 2-Fluorophenol due to matrix effect.

Surrogate	% RECOVERY	Surrogate	% RECOVERY
2-Fluorophenol	107	2-Fluorobiphenyl	95
Phenol-D6	83	2,4,6-Tribromophenol	84
Nitrobenzene-d5	86	Terphenyl-d14	86

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Semi	EPA 1311	12/3/97	EPA 8270	12/4/97	RP/HW	80 ea	100 ea

Director, Dr. Blair Leftwich

12-8-97
Date

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL REPORT

CLIENT NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

SAMPLE NO. : 7704415
INVOICE NO.: TE0255
REPORT DATE: 12-05-97
REVIEWED BY:
PAGE : 1 OF 1

CLIENT SAMPLE ID : SEWER INSERTS
SAMPLE TYPE .....: SLUDGE
SAMPLED BY .....: B. MADRID
SUBMITTED BY ....: B. MADRID
SAMPLE SOURCE ...: --

AUTHORIZED BY : B. MADRID
CLIENT P.O. : --
SAMPLE DATE ...: 11-24-97
SUBMITTAL DATE : 11-24-97
EXTRACTION DATE: --

TCLP Metals

D A T A T A B L E

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Arsenic (TCLP)	0.052	mg/L	0.050	12-01-97	SW846 7061	N. Munir
Barium (TCLP)	<5.0	mg/L	5.0	12-03-97	SW846 7080A	N. Munir
Cadmium (TCLP)	<0.25	mg/L	0.25	12-02-97	SW846 7130	N. Munir
Chromium (TCLP)	<0.50	mg/L	0.50	12-03-97	SW846 7190	N. Munir
Lead (TCLP)	<0.75	mg/L	0.75	12-03-97	SW846 7420	N. Munir
Mercury (TCLP)	<0.010	mg/L	0.010	12-01-97	SW846 7471A	N. Munir
Selenium (TCLP)	<0.050	mg/L	0.050	12-02-97	SW846 7741A	N. Munir
Silver (TCLP)	<0.25	mg/L	0.25	12-01-97	SW846 7760A	N. Munir

ANALYTICAL RESULT(S) REPORTED HEREIN APPLY ONLY TO THE SAMPLE(S) TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY.

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MANAGING DIRECTOR

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

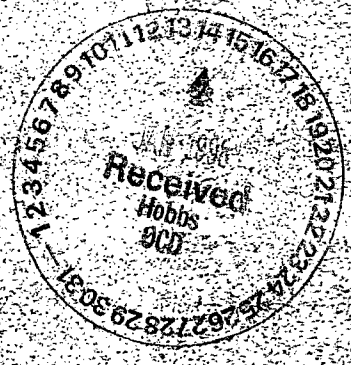
ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Dec 08, 1997
Date Rec: 11/24/97
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9712000033
Sampling Date: 11/24/97
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Vol in Solid (mg/L)	EPA Limit	Reporting Limit	Method Blank	T86399 Sewer Inserts	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	86	2	101	86
1,1-Dichloroethene	0.7	0.05	ND	ND	88	8	85	88
Methyl Ethyl Ketone	200.0	0.50	ND	ND	80	9	84	80
Chloroform	6.0	0.05	ND	ND	88	7	96	88
1,2-Dichloroethane	0.5	0.05	ND	ND	87	9	92	87
Benzene	0.5	0.05	ND	0.10	87	7	94	87
Carbon Tetrachloride	0.5	0.05	ND	ND	104	5	105	104
Trichloroethene	0.5	0.05	ND	ND	87	5	97	87
Tetrachloroethane	0.7	0.05	ND	ND	83	6	96	83
Chlorobenzene	100.0	0.05	ND	0.08	84	6	90	84
1,4-Dichlorobenzene	7.5	0.05	ND	ND	85	7	93	85

	% RECOVERY
Dibromofluoromethane	103
Toluene-d8	102
4-Bromofluorobenzene	100



TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	12/2/97	EPA 8260	12/3/97	RW	100 ea	100 ea

Director, Dr. Blair Leftwich

12-8-97
Date

TRACE ANALYSIS, INC.
An Institute for Advanced Environmental Research and Analysis

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Dec 08, 1997
Date Rec: 11/24/97
Project: N/A
Proj Name: N/A
Proj Loc: N/A

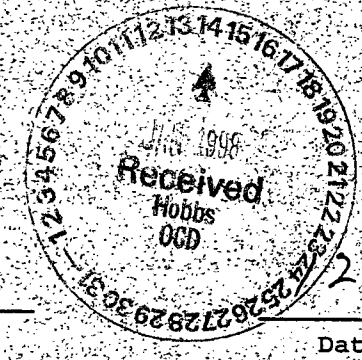
Lab Receiving # : 9712000033
Sampling Date: 11/24/97
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Semivolatiles in Solid (mg/L)	EPA Limit	Reporting Limit	Method Blank	T86399 Sewer Inserts	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	ND	92	0	0	92
1,4-Dichlorobenzene	7.5	0.05	ND	ND	91	3	64	91
o-Cresol	200.0	0.05	ND	ND	93	4	110	93
m,p-Cresol	200.0	0.05	ND	ND	94	7	286	94
Hexachloroethane	3.0	0.05	ND	ND	88	4	92	88
Nitrobenzene	2.0	0.05	ND	ND	84	3	76	84
Hexachlorobutadiene	0.5	0.05	ND	ND	75	5	42	75
2,4,6-Trichlorophenol	2.0	0.05	ND	ND	90	2	85	90
2,4,5-Trichlorophenol	400.0	0.05	ND	ND	92	2	94	92
2,4-Dinitrotoluene	0.13	0.05	ND	ND	92	2	80	92
2,4-D	10.0	0.05	ND	ND	84	2	176	84
Hexachlorobenzene	0.13	0.05	ND	ND	90	4	94	90
2,4,5-TP	1.0	0.05	ND	ND	76	4	314	76
Pentachlorophenol	100.0	0.05	ND	ND	83	12	124	83

ND = Not Detected

Surrogate	% RECOVERY	Surrogate	% RECOVERY
2-Fluorophenol	66	2-Fluorobiphenyl	86
Phenol-D6	24	2,4,6-Tribromophenol	56
Nitrobenzene-d5	68	Terphenyl-d14	92

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Semi	EPA 1311	12/3/97	EPA 8270	12/5/97	RP/HW	100 ea	100 ea



12-8-97

Director, Dr. Blair Leftwich

Date

TRACE ANALYSIS, INC.

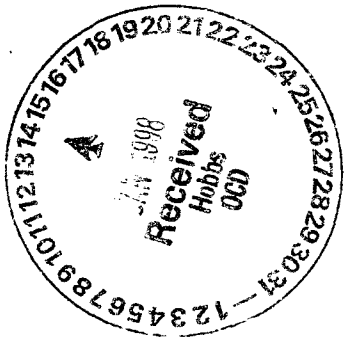
An Institute for Advanced Environmental Research and Analysis

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL REPORT

CLIENT NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

SAMPLE NO. : 7704417
INVOICE NO.: TE0255
REPORT DATE: 12-05-97
REVIEWED BY:
PAGE : 1 OF 1



CLIENT SAMPLE ID : BLAST SAND
SAMPLE TYPE .....: SOIL
SAMPLED BY .....: B. MADRID
SUBMITTED BY ....: B. MADRID
SAMPLE SOURCE ...: --

AUTHORIZED BY : B. MADRID
CLIENT P.O. : --
SAMPLE DATE ...: 11-24-97
SUBMITTAL DATE : 11-24-97
EXTRACTION DATE: --

TCLP Metals

D A T A T A B L E

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Arsenic (TCLP) .....:	<0.050	mg/L	0.050	12-01-97	SW846 7061	N. Munir
Barium (TCLP) .....:	<5.0	mg/L	5.0	12-03-97	SW846 7080A	N. Munir
Cadmium (TCLP) .....:	<0.25	mg/L	0.25	12-02-97	SW846 7130	N. Munir
Chromium (TCLP) .....:	<0.50	mg/L	0.50	12-03-97	SW846 7190	N. Munir
Lead (TCLP) .....:	<0.75	mg/L	0.75	12-03-97	SW846 7420	N. Munir
Mercury (TCLP) .....:	<0.010	mg/L	0.010	12-01-97	SW846 7471A	N. Munir
Selenium (TCLP) .....:	<0.050	mg/L	0.050	12-02-97	SW846 7741A	N. Munir
Silver (TCLP) .....:	<0.25	mg/L	0.25	12-01-97	SW846 7760A	N. Munir

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ANALYTICAL RESULT(S) REPORTED HEREIN APPLY ONLY TO THE SAMPLE(S) TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY.

A. Kemp

MANAGING DIRECTOR

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

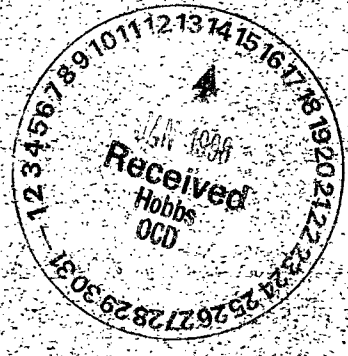
ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Dec 08, 1997
Date Rec: 11/24/97
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9712000033
Sampling Date: 11/24/97
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Vol in Solid (mg/L)	EPA Limit	Reporting Limit	Method Blank	T86401 Blast Sand	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	86	2	101	86
1,1-Dichloroethene	0.7	0.05	ND	ND	88	8	85	88
Methyl Ethyl Ketone	200.0	0.50	ND	ND	80	9	84	80
Chloroform	6.0	0.05	ND	ND	88	7	96	88
1,2-Dichloroethane	0.5	0.05	ND	ND	87	9	92	87
Benzene	0.5	0.05	ND	ND	87	7	94	87
Carbon Tetrachloride	0.5	0.05	ND	ND	104	5	105	104
Trichloroethene	0.5	0.05	ND	ND	87	5	97	87
Tetrachloroethane	0.7	0.05	ND	ND	83	6	96	83
Chlorobenzene	100.0	0.05	ND	ND	84	6	90	84
1,4-Dichlorobenzene	7.5	0.05	ND	ND	85	7	93	85

	% RECOVERY
Dibromofluoromethane	103
Toluene-d8	104
4-Bromofluorobenzene	100



TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	12/2/97	EPA 8260	12/3/97	RW	100 ea	100 ea

Director, Dr. Blair Leftwich

12-8-97
Date

TRACE ANALYSIS, INC.
An Institute for Advanced Environmental Research and Analysis

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Dec 08, 1997
Date Rec: 11/24/97
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9712000033
Sampling Date: 11/24/97
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Semivolatiles in Solid (mg/L)	EPA Limit	Reporting Limit	Method Blank	T86401 Blast Sand	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	ND	91	0	0	115
1,4-Dichlorobenzene	7.5	0.05	ND	ND	89	3	64	114
o-Cresol	200.0	0.05	ND	ND	91	4	110	116
m,p-Cresol	200.0	0.05	ND	ND	84	7	286	118
Hexachloroethane	3.0	0.05	ND	ND	86	4	92	110
Nitrobenzene	2.0	0.05	ND	ND	88	3	76	105
Hexachlorobutadiene	0.5	0.05	ND	ND	81	5	42	94
2,4,6-Trichlorophenol	2.0	0.05	ND	ND	88	2	85	112
2,4,5-Trichlorophenol	400.0	0.05	ND	ND	89	2	94	115
2,4-Dinitrotoluene	0.13	0.05	ND	ND	90	2	80	115
2,4-D	10.0	0.05	ND	ND	68	2	176	105
Hexachlorobenzene	0.13	0.05	ND	ND	89	4	94	112
2,4,5-TP	1.0	0.05	ND	ND	93	4	314	95
Pentachlorophenol	100.0	0.05	ND	ND	89	12	124	104

ND = Not Detected

Surrogate	% RECOVERY	Surrogate	% RECOVERY
2-Fluorophenol	97	2-Fluorobiphenyl	94
Phenol-D6	62	2,4,6-Tribromophenol	55
Nitrobenzene-d5	86	Terphenyl-d14	104

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Semi	EPA 1311	12/3/97	EPA 8270	12/4/97	RP/HW	80 ea	100 ea

Director, Dr. Blair Leftwich

Date

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL REPORT

CLIENT NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

SAMPLE NO. : 7704418
INVOICE NO.: TE0255
REPORT DATE: 12-05-97
REVIEWED BY:
PAGE : 1 OF 1

Received JAN 1998 Hobbs OCD

CLIENT SAMPLE ID : HYDROCARBON CONTAM. SOIL
SAMPLE TYPE .....: SOIL
SAMPLED BY .....: B. MADRID
SUBMITTED BY ....: B. MADRID
SAMPLE SOURCE ...: --

AUTHORIZED BY : B. MADRID
CLIENT P.O. : --
SAMPLE DATE ...: 11-24-97
SUBMITTAL DATE : 11-24-97
EXTRACTION DATE: --

TCLP Metals

D A T A T A B L E

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Arsenic (TCLP)	0.059	mg/L	0.050	12-01-97	SW846 7061	N. Munir
Barium (TCLP)	<5.0	mg/L	5.0	12-03-97	SW846 7080A	N. Munir
Cadmium (TCLP)	<0.25	mg/L	0.25	12-02-97	SW846 7130	N. Munir
Chromium (TCLP)	<0.50	mg/L	0.50	12-03-97	SW846 7190	N. Munir
Lead (TCLP)	<0.75	mg/L	0.75	12-03-97	SW846 7420	N. Munir
Mercury (TCLP)	<0.010	mg/L	0.010	12-01-97	SW846 7471A	N. Munir
Selenium (TCLP)	<0.050	mg/L	0.050	12-02-97	SW846 7741A	N. Munir
Silver (TCLP)	<0.25	mg/L	0.25	12-01-97	SW846 7760A	N. Munir

ANALYTICAL RESULT(S) REPORTED HEREIN APPLY ONLY TO THE SAMPLE(S) TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY.

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MANAGING DIRECTOR

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Dec 08, 1997
Date Rec: 11/24/97
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9712000033
Sampling Date: 11/24/97
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Vol in Solid (mg/L)	EPA Limit	Reporting Limit	Method Blank	T86402 Hydrocarbon Cont.	Soil QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	86	2	101	86
1,1-Dichloroethene	0.7	0.05	ND	ND	88	8	85	88
Methyl Ethyl Ketone	200.0	0.50	ND	ND	80	9	84	80
Chloroform	6.0	0.05	ND	ND	88	7	96	88
1,2-Dichloroethane	0.5	0.05	ND	ND	87	9	92	87
Benzene	0.5	0.05	ND	ND	87	7	94	87
Carbon Tetrachloride	0.5	0.05	ND	ND	104	5	105	104
Trichloroethene	0.5	0.05	ND	ND	87	5	97	87
Tetrachloroethane	0.7	0.05	ND	ND	83	6	96	83
Chlorobenzene	100.0	0.05	ND	ND	84	6	90	84
1,4-Dichlorobenzene	7.5	0.05	ND	ND	85	7	93	85

	% RECOVERY
Dibromofluoromethane	107
Toluene-d8	105
4-Bromofluorobenzene	100

Received
Hobbs
OCD

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	12/2/97	EPA 8260	12/3/97	RW	100 ea	100 ea

Director, Dr. Blair Leftwich

12-8-97
Date

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Lab Receiving # : 9712000033
Sampling Date: 11/24/97
Sample Condition: Intact and Cool
Sample Received By: VW

Date: Dec 08, 1997
Date Rec: 11/24/97
Project: N/A
Proj Name: N/A
Proj Loc: N/A

TCLP Semivolatiles in Solid (mg/L)	EPA Limit	Reporting Limit	Method Blank	T86402 Hydrocarbon Cont.	Soil QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	ND	92	0	0	92
1,4-Dichlorobenzene	7.5	0.05	ND	ND	91	3	64	91
o-Cresol	200.0	0.05	ND	ND	93	4	110	93
m,p-Cresol	200.0	0.05	ND	ND	94	7	286	94
Hexachloroethane	3.0	0.05	ND	ND	88	4	92	88
Nitrobenzene	2.0	0.05	ND	ND	84	3	76	84
Hexachlorobutadiene	0.5	0.05	ND	ND	75	5	42	75
2,4,6-Trichlorophenol	2.0	0.05	ND	ND	90	2	85	90
2,4,5-Trichlorophenol	400.0	0.05	ND	ND	92	2	94	92
2,4-Dinitrotoluene	0.13	0.05	ND	ND	92	2	80	92
2,4-D	10.0	0.05	ND	ND	84	2	176	84
Hexachlorobenzene	0.13	0.05	ND	ND	90	4	94	90
2,4,5-TP	1.0	0.05	ND	ND	76	4	314	76
Pentachlorophenol	100.0	0.05	ND	ND	83	12	124	83

ND = Not Detected

Surrogate	% RECOVERY	Surrogate	% RECOVERY
2-Fluorophenol	77	2-Fluorobiphenyl	106
Phenol-D6	42	2,4,6-Tribromophenol	60
Nitrobenzene-d5	88	Terphenyl-d14	105

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Semi	EPA 1311	12/3/97	EPA 8270	12/5/97	RP/HW	100 ea	100 ea

Received 12/08/97

Director, Dr. Blair Leftwich

Date

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue • Lubbock, Texas 79424 • 806•794•1296 • FAX 806•794•1298

ANALYTICAL REPORT

CLIENT NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

SAMPLE NO. : 7704422
INVOICE NO.: TE0255
REPORT DATE: 12-05-97
REVIEWED BY:
PAGE : 1 OF 1

CLIENT SAMPLE ID : COKED TRAYS
SAMPLE TYPE .....: SOLID
SAMPLED BY .....: B. MADRID
SUBMITTED BY ....: B. MADRID
SAMPLE SOURCE ...: --

AUTHORIZED BY : B. MADRID
CLIENT P.O. : --
SAMPLE DATE ...: 11-24-97
SUBMITTAL DATE : 11-24-97
EXTRACTION DATE: --

Received Dec 1997

TCLP Metals

DATA TABLE

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Arsenic (TCLP)	<0.050	mg/L	0.050	12-01-97	SW846 7061	N. Munir
Barium (TCLP)	<5.0	mg/L	5.0	12-03-97	SW846 7080A	N. Munir
Cadmium (TCLP)	<0.25	mg/L	0.25	12-02-97	SW846 7130	N. Munir
Chromium (TCLP)	2.6	mg/L	0.50	12-03-97	SW846 7190	N. Munir
Lead (TCLP)	<0.75	mg/L	0.75	12-03-97	SW846 7420	N. Munir
Mercury (TCLP)	<0.010	mg/L	0.010	12-01-97	SW846 7471A	N. Munir
Selenium (TCLP)	<0.050	mg/L	0.050	12-02-97	SW846 7741A	N. Munir
Silver (TCLP)	<0.25	mg/L	0.25	12-01-97	SW846 7760A	N. Munir

Cr Limit 5.0 mg/L

(1) Copy to Client

ANALYTICAL RESULT(S) REPORTED HEREIN APPLY ONLY TO THE SAMPLE(S) TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY.

MANAGING DIRECTOR

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Dec 08, 1997
Date Rec: 11/24/97
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9712000033
Sampling Date: 11/24/97
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Vol in Solid (mg/L)	EPA Limit	Reporting Limit	Method Blank	T86406 Coked Trays	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	86	2	101	86
1,1-Dichloroethene	0.7	0.05	ND	ND	88	8	85	88
Methyl Ethyl Ketone	200.0	0.50	ND	ND	80	9	84	80
Chloroform	6.0	0.05	ND	ND	88	7	96	88
1,2-Dichloroethane	0.5	0.05	ND	ND	87	9	92	87
Benzene	0.5	0.05	ND	ND	87	7	94	87
Carbon Tetrachloride	0.5	0.05	ND	ND	104	5	105	104
Trichloroethene	0.5	0.05	ND	ND	87	5	97	87
Tetrachloroethane	0.7	0.05	ND	ND	83	6	96	83
Chlorobenzene	100.0	0.05	ND	ND	84	6	90	84
1,4-Dichlorobenzene	7.5	0.05	ND	ND	85	7	93	85

	% RECOVERY
Dibromofluoromethane	107
Toluene-d8	104
4-Bromofluorobenzene	99

Received
Hobbs
OCD

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	12/2/97	EPA 8260	12/3/97	RW	100 ea	100 ea

Director, Dr. Blair Leftwich

12-8-97
Date

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Dec 08, 1997
Date Rec: 11/24/97
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9712000033
Sampling Date: 11/24/97
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Semivolatiles in Solid (mg/L)	EPA Limit	Reporting Limit	Method Blank	T86406 Coked Trays	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	ND	92	0	0	92
1,4-Dichlorobenzene	7.5	0.05	ND	ND	91	3	64	91
o-Cresol	200.0	0.05	ND	ND	93	4	110	93
m,p-Cresol	200.0	0.05	ND	ND	94	7	286	94
Hexachloroethane	3.0	0.05	ND	ND	88	4	92	88
Nitrobenzene	2.0	0.05	ND	ND	84	3	76	84
Hexachlorobutadiene	0.5	0.05	ND	ND	75	5	42	75
2,4,6-Trichlorophenol	2.0	0.05	ND	ND	90	2	85	90
2,4,5-Trichlorophenol	400.0	0.05	ND	ND	92	2	94	92
2,4-Dinitrotoluene	0.13	0.05	ND	ND	92	2	80	92
2,4-D	10.0	0.05	ND	ND	84	2	176	84
Hexachlorobenzene	0.13	0.05	ND	ND	90	4	94	90
2,4,5-TP	1.0	0.05	ND	ND	76	4	314	76
Pentachlorophenol	100.0	0.05	ND	ND	83	12	124	83

ND = Not Detected

*Surrogate recovery out of standard range for 2-Fluorophenol and 2-Fluorobiphenyl due to matrix effect.

Surrogate	% RECOVERY	Surrogate	% RECOVERY
2-Fluorophenol	176	2-Fluorobiphenyl	148
Phenol-D6	86	2,4,6-Tribromophenol	70
Nitrobenzene-d5	114	Terphenyl-d14	112

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Semi	EPA 1311	12/3/97	EPA 8270	12/5/97	RP/HW	100 ea	100 ea

Received
12-8-97

Director, Dr. Blair Leftwich

Date

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL REPORT

CLIENT NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

SAMPLE NO. : 7704413
INVOICE NO.: TE0255
REPORT DATE: 12-05-97
REVIEWED BY:
PAGE : 1 OF 1

CLIENT SAMPLE ID : CERAMIC SUPPORT MEDIA
SAMPLE TYPE .....: CATALYST
SAMPLED BY .....: B. MADRID
SUBMITTED BY ....: B. MADRID
SAMPLE SOURCE ...: --

AUTHORIZED BY : B. MADRID
CLIENT P.O. : --
SAMPLE DATE ...: 11-24-97
SUBMITTAL DATE : 11-24-97
EXTRACTION DATE:

Received
Hobbs
OCD

TCLP Metals

DATA TABLE

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Arsenic (TCLP)	<0.050	mg/L	0.050	12-01-97	SW846 7061	N. Munir
Barium (TCLP)	<5.0	mg/L	5.0	12-03-97	SW846 7080A	N. Munir
Cadmium (TCLP)	<0.25	mg/L	0.25	12-02-97	SW846 7130	N. Munir
Chromium (TCLP)	<0.50	mg/L	0.50	12-03-97	SW846 7190	N. Munir
Lead (TCLP)	<0.75	mg/L	0.75	12-03-97	SW846 7420	N. Munir
Mercury (TCLP)	<0.010	mg/L	0.010	12-01-97	SW846 7471A	N. Munir
Selenium (TCLP)	<0.050	mg/L	0.050	12-02-97	SW846 7741A	N. Munir
Silver (TCLP)	<0.25	mg/L	0.25	12-01-97	SW846 7760A	N. Munir

ANALYTICAL RESULT(S) REPORTED HEREIN APPLY ONLY TO THE SAMPLE(S) TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY.

(1) Copy to Client

MANAGING DIRECTOR

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

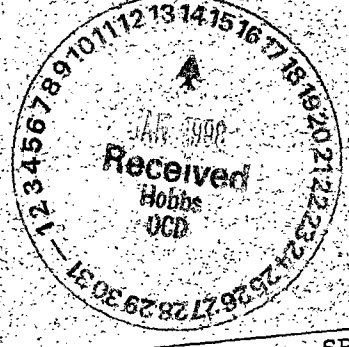
ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Lab Receiving # : 9712000033
Sampling Date: 11/24/97
Sample Condition: Intact and Cool
Sample Received By: VW

Date: Dec 08, 1997
Date Rec: 11/24/97
Project: N/A
Proj Name: N/A
Proj Loc: N/A

TCLP Vol in Solid (mg/L)	EPA Limit	Reporting Limit	Method Blank	T86397 Ceramic Support Media	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	86	2	101	86
1,1-Dichloroethene	0.7	0.05	ND	ND	88	8	85	88
Methyl Ethyl Ketone	200.0	0.50	ND	ND	80	9	84	80
Chloroform	6.0	0.05	ND	ND	88	7	96	88
1,2-Dichloroethane	0.5	0.05	ND	ND	87	9	92	87
Benzene	0.5	0.05	ND	ND	87	7	94	87
Carbon Tetrachloride	0.5	0.05	ND	ND	104	5	105	104
Trichloroethene	0.5	0.05	ND	ND	87	5	97	87
Tetrachloroethane	0.7	0.05	ND	ND	83	6	96	83
Chlorobenzene	100.0	0.05	ND	ND	84	6	90	84
1,4-Dichlorobenzene	7.5	0.05	ND	ND	85	7	93	85

	% RECOVERY
Dibromofluoromethane	102
Toluene-d8	103
4-Bromofluorobenzene	100



TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	12/2/97	EPA 8260	12/3/97	RW	100 ea	100 ea

TBS

Director, Dr. Blair Leftwich

12-8-97

Date

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Dec 08, 1997
Date Rec: 11/24/97
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9712000033
Sampling Date: 11/24/97
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Semivolatiles in Solid (mg/L)	EPA Limit	Reporting Limit	Method Blank	T86397 Ceramic Support Media	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	ND	91	0	0	115
1,4-Dichlorobenzene	7.5	0.05	ND	ND	89	3	64	114
o-Cresol	200.0	0.05	ND	ND	91	4	110	116
m,p-Cresol	200.0	0.05	ND	ND	84	7	286	118
Hexachloroethane	3.0	0.05	ND	ND	86	4	92	110
Nitrobenzene	2.0	0.05	ND	ND	88	3	76	105
Hexachlorobutadiene	0.5	0.05	ND	ND	81	5	42	94
2,4,6-Trichlorophenol	2.0	0.05	ND	ND	88	2	85	112
2,4,5-Trichlorophenol	400.0	0.05	ND	ND	89	2	94	115
2,4-Dinitrotoluene	0.13	0.05	ND	ND	90	2	80	115
2,4-D	10.0	0.05	ND	ND	68	2	176	105
Hexachlorobenzene	0.13	0.05	ND	ND	89	4	94	112
2,4,5-TP	1.0	0.05	ND	ND	93	4	314	95
Pentachlorophenol	100.0	0.05	ND	ND	89	12	124	104

ND = Not Detected

Surrogate	% RECOVERY	Surrogate	% RECOVERY
2-Fluorophenol	84	2-Fluorobiphenyl	92
Phenol-D6	48	2,4,6-Tribromophenol	44
Nitrobenzene-d5	75	Terphenyl-d14	103

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Semi	EPA 1311	12/3/97	EPA 8270	12/4/97	RP/HW	80 ea	100 ea

Received
Hobbs
OCD

Director, Dr. Blair Leftwich

Date

TraceAnalysis, Inc.

6701 Aberdeen Avenue, Ste. 9 Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

LAB Order ID #

Company Name: NAVAJO REFINING Co. Phone #:

Address: Fax #:

Contact Person: BRYAN MADRID

Invoice to: (If different from above)

Project #: Project Name:

Project Location: Sampler Signature: Bryan Madrid

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	Catalyst	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME
770 44112	VACUUM TOWER SCALE	1	1L				X				X	X	11-24-97	8:00
44113	CERAMIC SUPPORT MEDIA	1	1L					X			X	X	11-24-97	8:15
44114	SAND FILTER	1	1L					X			X	X	11-24-97	8:30
44115	SEWER INSERTS	1	1L				X				X	X	11-24-97	8:45
44116	EXCHANGER SLUDGE	1	1L				X				X	X	11-24-97	9:00
44117	BLAST SAND	1	1L		X						X	X	11-24-97	9:15
44118	HYDROCARBON CONTAMINATED SOIL	1	1L		X						X	X	11-24-97	9:30
44119	DESULFURIZATION CATALYST	1	1L					X			X	X	11-24-97	9:45
44120	BAUXITE DRYER MEDIA	1	1L					X			X	X	11-24-97	10:00
44121	FLARE K.O. DRUM SCALE	1	1L				X				X	X	11-24-97	10:15
770 44122	COKED TRAYS	1	1L								X	X	11-24-97	10:30

ANALYSIS REQUEST (Circle or Specify Method No.)

MTBE 8020/602	BTEX 8020/602	TPH	PAH 8270	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	GC.MS Vol. 8240/8260/624	GC/MS Semi. Vol. 8270/625	PCB's 8080/608	Pest. 8080/608	BOD, TSS, PH	Turn Around Time if different from standard	Hold
					X	X	X	X							
					X	X	X	X							
					X	X	X	X							
					X	X	X	X							
					X	X	X	X							
					X	X	X	X							
					X	X	X	X							
					X	X	X	X							
					X	X	X	X							
					X	X	X	X							
					X	X	X	X							

Received by: Date: Time:

Relinquished by: Bryan Madrid Date: 11-24-97 Time: 12:00

Received by: Date: Time:

Relinquished by: Date: Time:

Received at Laboratory by: Date: Time:
11/24/97 12:00

LAB USE ONLY
Intact Y / N
Headspace Y / N
Temp °C
Log-In Review

REMARKS: Iced on ice

Carrier #

Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C.O.C.

ORIGINAL COPY

TraceAnalysis, Inc.

6701 Aberdeen Avenue, Ste. 9 Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

LAB Order ID #

Company Name: NAVAJO REFINING CO. Phone #:

Address: Fax #:

Contact Person: BRYAN MADRID

Invoice to: (If different from above)

Project #: Project Name:

Project Location: Sampler Signature: Bryan Madrid

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME
770444123	DEPROPANIZER SCALE	1	1L				X			X	X	11-24-97	10:45
770444124	COOLING TOWER SLUDGE	1	1L				X			X	X	11-20-97	13:00

ANALYSIS REQUEST (Circle or Specify Method No.)

MTBE 8020/602	BTEX 8020/602	TPH	PAH 8270	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	GC.MS Vol. 8240/8260/624/	GC/MS Semi. Vol. 8270/625	PCB's 8080/608	Pest. 8080/608	BOD, TSS, PH					Turn Around Time if different from standard	Hold
					X	X	X	X											
					X	X	X	X											

Received (Hobbs, NM) 11/21/97 10:45

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Bryan Madrid	11-24-97	12:00			
Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received at Laboratory by:	Date:	Time:
				11/24/97	12:00

LAB USE ONLY
Intact Y / N
Headspace Y / N
Temp °
Log-in Review

REMARKS: Rcd on ice

Carrier #

Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C.O.C.

ORIGINAL COPY

P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facil
2. Management Facility Destination: Controlled Recovery, Inc.	6. Transporter Triad
3. Address of Facility Operator P.O. Box 369 Hobbbs,	8. State NM
7. Location of Material (Street Address or ULSTR) 501 E Main Artesia, NM	

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is non-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the waste delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajo Refining Artesia facility. The sulfur guard was generated due to a change out. Sulfur guard is used to strip alulfur out of kerosene in the kerosene HDU reactor at the Navajo Artesia facility. I have included a certificate of waste and a chain of custody.

SENT TO ARTESIA 1/14/98 - MR MARSH REQUEST
I SENT TO NMOCD-SF DIRECT! JP

Estimated Volume 20 yds cy Known Volume (to be entered by the operator at the end of the haul) cy

SIGNATURE [signature] TITLE Office Manager DATE 09/15/97
Operator/Management Facility/Authorized Agent

TYPE OR PRINT NAME Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: [signature] TITLE Field Rep II DATE 1/15/98

APPROVED BY: Martyne J Kudy TITLE Env. Geologist DATE 1/21/98

H. Cabnet · SE · CRI · Jan 21 98

P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

NEW MEXICO
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-
Originated

Submit O
Plus 1
to appro
District

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator **Navajo Refining**
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site **Artesia Facil**
2. Management Facility Destination **Controlled Recovery, Inc.**	6. Transporter **Triad**
3. Address of Facility Operator **P.O. Box 369 Hobbbs,**	8. State **NM**
7. Location of Material (Street Address or ULSTR) **501 E Main Artesia, NM**	

9. Circle One:

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OCD HOBBS OFFICE
SEP 16 1997
RECEIVED

Estimated Volume **20 yds** cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: **Offfice Manager** DATE: **09/15/97**

TYPE OR PRINT NAME: **Billie Charo** TELEPHONE NO. **(505)393-1079**

(This space for State Use)

APPROVED BY: _____ TITLE: Envir Engr DATE: 9/18/97

APPROVED BY: _____ TITLE: Env Geologist DATE: 1/21/98

TELEPHONE
(505) 748-3311

EASYLINK
62905278

REFINING COMPANY

501 EAST MAIN STREET • P. O. BOX 159
ARTESIA, NEW MEXICO 88211-0159

FAX
(505) 746-6410 ACCTG
(505) 746-6155 EXEC
(505) 748-9077 ENGR
(505) 746-4438 P / L

September 10, 1997

Ken Marsh
CRI Inc.
P.O. Box 369
Hobbs, NM 88241

Dear Mr. Marsh:

We recently had an analysis run on Sulfur Guard Catalyst from our refinery here at Navajo. Enclosed you will find the results and a Certificate of Waste for this media that we hope to get profiled into your facility.

Sulfur guard is used to strip sulfur out of kerosene in our kerosene HDU reactor. Due to a change out, four supersacks were accumulated that will be shipped via Triad Trucking in a 20 yard roll off bin.

If you have any questions, please contact me at (505) 748-3311. Thank you for your time in this matter.

Sincerely,

NAVAJO REFINING CO.

Bryan Madrid

Bryan Madrid
Environmental Specialist

Encl.

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO., ARTESIA

Sources: PETROLEUM REFINING - SULFUR GUARD

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING concur with the status of the waste from the subject site.

OCD HOBBS

SEP 18 1997

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Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88211

Signature Bryan Madrid

Date 9/10/97

Pace Analytical Services, Inc.
161 James Drive West, Suite 100
St. Rose, LA 70087
Tel: 504-469-0333
Fax: 504-469-0555

Pace Analytical

Darrell Moore
Navajo Refining Co.
Post Office Box 159
Artesia, NM 88211

Project: TCLP'S
Site:
Episode: IMW

To: Darrell Moore

Enclosed please find the analytical results for sample(s) received by Pace Analytical Services, Inc. - New Orleans.

This report contains a summary of the quality control data associated with the analyses as well as copies of the chain-of-custody documents.

You may direct any inquires concerning this report to your Project Manager, or any one of the Project Managers listed below:

Ms. Karen H. Brown, Manager, Ext. 325
Mr. Craig McCollum, Ext. 326
Ms. Cindy Olavesen, Ext. 327

Sincerely,

Cindy Olavesen
Project Manager

8/14/97
Date

Enclosures

AUG 18 1997
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Pace Analytical Services, Inc. - New Orleans
Sample Cross Reference Summary

Episode: IMW Client: Navajo Refining Co.

Project: TCLP'S

Site:

Lab ID	Client ID	Description	Matrix	Collected	Received
IMW-001	SEWER INSERTS		Other	08/04/97	08/05/97
IMW-002	SULFUR GUARD		Other	08/04/97	08/05/97

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Report of Laboratory Analysis

Pace Analytical Services, Inc. - New Orleans

Single Sample - Protocol

Client ID:	SULFUR GUARD	**Client:**	NAVAJO REFINING CO.
Project:	TCLP'S	**Site:**	None
Lab ID:	IMW-002 Leachate	**Episode:**	IMW
Description:	None	**Matrix:**	Other
Method:	Leachate SW 8240 TCLP Volatile Organics	**Batch:**	23412

Sample Qu:

% Moisture: n/a

Units: mg/l

Prep Factor: 1.00 **Leached:** 8/8/97 **Prepared:** **Analyzed:** 14-Aug-97 15:17 KC

CAS Number	Parameter	Dilution	Result	Qu	Reporting Limit	Reg. Limit
71-43-2	Benzene	2	ND	D2 C3	0.100	0.500
78-93-3	2-Butanone (Methyl ethyl ketone)	2	ND	D2 C3	0.200	200
56-23-5	Carbon tetrachloride	2	ND	D2 C3	0.100	0.500
108-90-7	Chlorobenzene	2	ND	D2 C3	0.100	100
67-66-3	Chloroform	2	ND	D2 C3	0.100	6.00
107-06-2	1,2-Dichloroethane (Ethylene dichloride)	2	ND	D2 C3	0.100	0.500
75-35-4	1,1-Dichloroethene (Dichloroethylene)	2	ND	D2 C3	0.100	0.700
127-18-4	Tetrachloroethene (Perchloroethylene)	2	ND	D2 C3	0.100	0.700
79-01-6	Trichloroethene (Trichloroethylene)	2	ND	D2 C3	0.100	0.500
75-01-4	Vinyl chloride (Chloroethene)	2	ND	D2 C3	0.200	0.200

10 compound(s) reported

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ND denotes Not Detected at or above the adjusted reporting limit.
DF denotes Dilution Factor of extract. The Prep Factor accounts for a non-routine sample size.
Reporting Limit is corrected for sample size, dilution and moisture content if applicable.
Qu lists qualifiers. Specific qualifiers are defined at the end of the report.
For moisture results, wet denotes result is not corrected for moisture and n/a denotes not applicable.

Report of Laboratory Analysis

Pace Analytical Services, Inc. - New Orleans

Single Sample - Protocol

Client ID:	SULFUR GUARD	**Client:**	NAVAJO REFINING CO.
Project:	TCLP'S	**Site:**	None
Lab ID:	MW-002 Leachate	**Episode:**	MW
Description:	None	**Matrix:**	Other
Method:	Leachate SW 8270 TCLP Semivolatile Organics	**Batch:**	23363

Sample Qu:

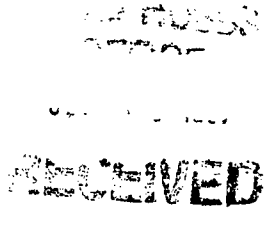
% Moisture: n/a

Units: mg/l

Prep Factor: 1.00 **Leached:** 8/6/97 **Prepared:** 07-Aug-97 **Analyzed:** 12-Aug-97 19:44 JA

CAS Number	Parameter	Dilution	Result	Qu	Reporting Limit	Reg. Limit
106-46-7	1,4-Dichlorobenzene (p-Dichlorobenzene)	1	ND	C3	0.0400	7.50
51-28-5	2,4-Dinitrotoluene	1	ND	C3	0.0400	0.130
118-74-1	Hexachlorobenzene	1	ND	C3	0.0400	0.130
118-74-1	Hexachlorobutadiene	1	ND	C3	0.0400	0.500
67-72-1	Hexachloroethane	1	ND	C3	0.0400	3.00
95-48-7	2-Methylphenol (o-Cresol)	1	ND	C3	0.0400	200
108-39-4	3-Methylphenol (m-Cresol)	1	ND	C3	0.0400	200
106-44-5	4-Methylphenol (p-Cresol)	1	ND	C3	0.0400	200
98-95-3	Nitrobenzene	1	ND	C3	0.0400	2.00
87-86-5	Pentachlorophenol	1	ND	C3	0.100	100
110-86-1	Pyridine	1	ND	C3	0.0400	5.00
95-95-4	2,4,5-Trichlorophenol	1	ND	C3	0.100	400
88-06-2	2,4,6-Trichlorophenol	1	ND	C3	0.0400	2.00

13 compound(s) reported



ND denotes Not Detected at or above the adjusted reporting limit.
DF denotes Dilution Factor of extract. The Prep Factor accounts for a non-routine sample size.
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For moisture results, wet denotes result is not corrected for moisture and n/a denotes not applicable.

Report of Laboratory Analysis

Pace Analytical Services, Inc. - New Orleans

Single Sample - Inorganic Parameters

Client ID: SULFUR GUARD
Client: NAVAJO REFINING CO.
Project: TCLP'S
Site: None
Lab ID: IMW-002 Leachate
Episode: IMW
Description: None
Matrix: Other
%Moisture: n/a

ParameterName	Method	Batch	DF	PF	Result	Qu	Units	Reporting Limit	Prep.	Analysis			Reg. Limit
Arsenic	SW 6010	23384	1	1	ND	C3	mg/l	1.00	08-Aug-97	08-Aug-97	17:40	KJR	5.00
Barium	SW 6010	23384	1	1	ND	C3	mg/l	1.00	08-Aug-97	08-Aug-97	17:40	KJR	100
Cadmium	SW 6010	23384	1	1	ND	C3	mg/l	0.100	08-Aug-97	08-Aug-97	17:40	KJR	1.00
Chromium	SW 6010	23384	1	1	ND	C3	mg/l	0.500	08-Aug-97	08-Aug-97	17:40	KJR	5.00
Lead	SW 6010	23384	1	1	ND	C3	mg/l	0.500	08-Aug-97	08-Aug-97	17:40	KJR	5.00
Mercury	SW 7470	23385	1	1	ND	C3	mg/l	0.0002	11-Aug-97	11-Aug-97	16:53	KJR	0.200
Selenium	SW 6010	23384	1	1	ND	C3	mg/l	0.200	08-Aug-97	08-Aug-97	17:40	KJR	1.00
Silver	SW 6010	23384	1	1	ND	C3	mg/l	0.500	08-Aug-97	08-Aug-97	17:40	KJR	5.00

8 parameter(s) reported

ND denotes Not Detected at or above the adjusted reporting limit.
DF denotes Dilution Factor of final sample. The Prep Factor accounts for a non-routine sample size.
Reporting Limit is corrected for sample size, dilution and moisture content if applicable.
Qu lists qualifiers. Specific qualifiers are defined at the end of the report.
For moisture results, wet denotes result is not corrected for moisture and n/a denotes not applicable.

8/14/97 17:05:05

Report of Laboratory Analysis

Pace Analytical Services, Inc. - New Orleans

Single Sample - Inorganic Parameters

Client ID: SULFUR GUARD
Client: NAVAJO REFINING CO.
Project: TCLP'S
Site: None
Lab ID: IMW-002
Episode: IMW
Description: None
Matrix: Other
%Moisture: n/a

ParameterName	Method	Batch	DF	PF	Result	Qu	Units	Reporting Limit	Prep.	Analysis		Reg. Limit
pH-Corrosivity	SW 9045	23358	1	1	7.12	C3	S.U.			05-Aug-97	DM	
Reactive Cyanide	SW 7.3.3.2	23406	1	1	ND	C3	mg/kg	25.0	12-Aug-97	13-Aug-97	MH	
Reactive Sulfide	SW 7.3.4.2	23406	1	1	ND	C3	mg/kg	50.0	12-Aug-97	13-Aug-97	DM	

3 parameter(s) reported

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ND denotes Not Detected at or above the adjusted reporting limit.
DF denotes Dilution Factor of final sample. The Prep Factor accounts for a non-routine sample size.
Reporting Limit is corrected for sample size, dilution and moisture content if applicable.
Qu lists qualifiers. Specific qualifiers are defined at the end of the report.
For moisture results, wet denotes result is not corrected for moisture and n/a denotes not applicable.

Analytical Results - Conventional Parameters

NAVAJO REFINING COMPANY

Non-Liquid Ignitability Data Sheet

Prepared Date: NA
Analyzed Date: 8/06/97 @ 15:00

Client ID/ Lab ID	Spontaneous Ignition	Ignitable With Moisture	Ignites When Agitated	Burns Vigorously When Lit	Meet Ignitable Characteristic
SEWER INSERTS (IMW-001)	No	No	No	No	No
SULFUR GUARD (IMW-002)	No	No	No	No	No

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RCRA Characteristic - Ignitability

For non-liquid samples the EPA methods and guidelines for judging samples as meeting the characteristic of ignitability are ill- defined. For liquid samples, a closed cup flashpoint test is performed and this allows the determination of a flash temperature.

For the non-liquid samples the regulation specifically states:

> "It is not a liquid and is capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard" and there is no method referenced.

In order to determine whether samples meet this characteristic we have devised the following set of tests, and present the results of each component to our clients. As opposed to the temperature of flashpoint presented for liquid samples, only a YES or NO is provided as final data for the determination of non-liquid Ignitability.

Test Components

A)	sample undergoes spontaneous combustion	YES or NO
B)	sample ignites when moisture added (water)	YES or NO
C)	sample burns vigorously when lit with a flame (open container)	YES or NO
D)	sample ignites when agitated (friction)	YES or NO

Determination:

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If any of the A, B, or D components are YES the sample will be determined as Ignitable. If only C is YES, the sample would still NOT meet the criteria and the sample would be deemed NON IGNITABLE.

If you have any questions with regard to procedures or data, please contact our laboratory.

Pace Analytical Services, Inc. - New Orleans
Laboratory Quality Control Definitions

Our laboratory employs quality control (QC) measures to ensure the quality of our analytical data by defining its accuracy and precision. Presentation of the QC data with the report allows the data user the opportunity to evaluate these results and to gauge the method performance. In order to assist the understanding of these data, routine components of our QC program are defined below.

BATCH - A batch is a group of 20 samples or less of a given matrix and analysis by a specific protocol or analytical method.

BLANK - A method blank is a "clean" laboratory sample carried through the entire analytical process. One or more method blanks are prepared with each batch of samples. The analysis of method blanks demonstrates that method interferences caused by contaminants, reagents and glassware are known and minimized. A method blank should not contain any analytes of interest above the reporting limit. There are method allowances for common laboratory artifacts such as methylene chloride, acetone and bis-2-ethylhexyl phthalate.

LABORATORY CONTROL SPIKE - A laboratory control spike (LCS or blank spike) is a blank which has been spiked with known concentrations of target analytes. The LCS is carried through the entire analytical process. One or more LCS are prepared with each batch of samples. The percent recovery of the spiked analytes provides a measure of the accuracy of the analytical process in the absence of matrix effects.

MATRIX SPIKE - A matrix spike (MS) is a client sample which is spiked with known concentrations of target analytes. The MS is carried through the entire analytical process. One or more matrix spikes are prepared with every batch of samples. For organic methods, a matrix spike duplicate (MSD) is also prepared. The percent recovery of the spiked analytes provides a measure of the method accuracy in the selected sample and matrix.

DUPLICATE - A duplicate is a sample for which replicate aliquouts are carried through the entire analytical process. Comparison of the original results to those of the duplicate results provides a measure of the method precision in the sample and matrix. By convention, precision is measured for inorganic analyses using a sample and a sample duplicate, whereas for organics analyses, an MS/MSD are used.

SURROGATE - A surrogate is a non-target analyte which is added to all samples and QC samples prior to extraction or analysis. The percent recovery of the surrogate provides a measure of the method accuracy in each sample tested. Surrogates are used for organics methods only.

QC LIMITS - QC limits specify the expected percent recovery range for a spiked compound. QC limits may be set by method criteria or calculated from laboratory generated data. For many methods, these limits are advisory and do not require corrective action if exceeded.

Report of Quality Control

Pace Analytical Services, Inc. - New Orleans

Organic Protocol - Single Batch

Episode: IMW

Method: Leachate GC/MS Volatile Organics Batch: 23412 Units: mg/l

Parameter Name	LCS Spike	LCS %Rec	LCSD %Rec	MS Spike	MS %Rec	MSD %Rec	Dup %RPD	QC Limits LCS	QC Limits MS/MSD	RPD Max	Qu
Benzene	0.200	97		0.200	98	94	4	1-200	0-200	35	
2-Butanone (Methyl ethyl ketone)	0.200	108		0.200	117	120	3	1-200	0-200	35	
Carbon tetrachloride	0.200	91		0.200	113	108	5	1-200	0-200	35	
Chlorobenzene	0.200	87		0.200	99	94	5	1-200	0-200	35	
Chloroform	0.200	97		0.200	89	88	1	1-200	0-200	35	
1,2-Dichloroethane (Ethylene dichloride)	0.200	99		0.200	99	91	8	1-200	0-200	35	
1,1-Dichloroethene (Dichloroethylene)	0.200	99		0.200	97	97	0	1-200	0-200	35	
Tetrachloroethene (Perchloroethylene)	0.200	75		0.200	96	91	5	1-200	0-200	35	
Trichloroethene (Trichloroethylene)	0.200	94		0.200	101	101	0	1-200	0-200	35	
Vinyl chloride (Chloroethene)	0.200	89		0.200	85	86	1	1-200	0-200	35	

10 compound(s) reported

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* denotes recovery outside of QC limits.
MS spike concentrations are not corrected for moisture content of the spiked sample.

Report of Quality Control

Pace Analytical Services, Inc. - New Orleans

Organic Protocol - Single Batch

Episode: EMW

Method: Leachate GC/MS Semivolatile Organics Batch: 23363 Units: mg/l

Parameter Name	LCS Spike	LCS %Rec	LCSD %Rec	MS Spike	MS %Rec	MSD %Rec	Dup %RPD	QC Limits LCS	QC Limits MS/MSD	RPD Max	Qu
1,4-Dichlorobenzene (p-Dichlorobenzene)	0.100	66		0.100	61	69	12	1-200	0-200	35	
2,4-Dinitrotoluene	0.100	82		0.100	71	84	17	1-200	0-200	35	
Hexachlorobenzene	0.100	85		0.100	77	87	12	1-200	0-200	35	
Hexachlorobutadiene	0.100	70		0.100	73	77	5	1-200	0-200	35	
Hexachloroethane	0.100	63		0.100	59	66	11	1-200	0-200	35	
2-Methylphenol (o-Cresol)	0.300	75		0.300	73	78	7	1-200	0-200	35	
3-Methylphenol (m-Cresol)	0.300	72		0.300	70	75	7	1-200	1-200	35	
4-Methylphenol (p-Cresol)	0.300	72		0.300	70	75	7	1-200	0-200	35	
Nitrobenzene	0.100	72		0.100	79	80	1	1-200	0-200	35	
Pentachlorophenol	0.300	81		0.300	72	82	13	1-200	0-200	35	
Pyridine	0.100	60		0.100	57	70	20	1-200	0-200	35	
2,4,5-Trichlorophenol	0.300	71		0.300	71	77	8	1-200	0-200	35	
2,4,6-Trichlorophenol	0.300	70		0.300	72	75	4	1-200	0-200	35	

13 compound(s) reported

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* denotes recovery outside of QC limits.
MS spike concentrations are not corrected for moisture content of the spiked sample.

Report of Batch Surrogate Recovery

Pace Analytical Services, Inc. - New Orleans

Organic Protocol - Single Batch

Episode: IMW

Method: Leachate GC/MS Semivolatile Organics Batch: 23363

Lab ID	Sur 1 %Rec	Sur 2 %Rec	Sur 3 %Rec	Sur 4 %Rec	Sur 5 %Rec	Sur 6 %Rec	Sur 7 %Rec	Sur 8 %Rec
23363B1	81	74	95	80	73	84		
23363B2	87	70	88	89	82	71		
23363B3	87	68	89	89	81	82		
23363MS	82	69	95	78	74	88		
23363MSD	91	73	111	85	81	91		
23363S1	83	71	109	81	75	91		
IJN-001	122 D	73	81	101	91	88		
IKQ-001	85	70	98	80	71	88		
IKR-001	66	53	80	59	51	66		
IKS-001	88	75	108	85	77	94		
IKT-001	90	80	101	83	77	91		
ILG-001	90	78	100	85	80	98		
ILH-001	90	81	100	85	76	93		
ILI-001	92	79	99	80	73	91		
ILJ-001	82	69	93	80	74	93		
IMV-001	90	62	86	85	77	81		
IMW-001	85	63	81	88	82	88		
IMW-002	85	55	79	85	78	82		
QC limits:	35 - 114	43 - 116	33 - 141	1 - 105	1 - 112	1 - 115		

Sur 1: SS Nitrobenzene-d5
Sur 2: SS 2-Fluorobiphenyl
Sur 3: SS Terphenyl-d14
Sur 4: SS Phenol-d5
Sur 5: SS 2-Fluorophenol
Sur 6: SS 2,4,6-Tribromophenol

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* denotes surrogate recovery outside of QC limits.
D denotes surrogate recovery is outside of QC limits due to sample dilution, and is not considered an excursion.
A Lab ID consisting of a batch number with a B suffix is a method blank.
A Lab ID consisting of a batch number with a S suffix is an LCS.
A Lab ID with a MS suffix is a matrix spike.
A Lab ID with a MSD suffix is a matrix spike duplicate.

Report of Batch Surrogate Recovery

Pace Analytical Services, Inc. - New Orleans

Organic Protocol - Single Batch

Episode: IMW

Method: Leachate GC/MS Volatile Organics

Batch: 23412

Lab ID	Sur 1 %Rec	Sur 2 %Rec	Sur 3 %Rec	Sur 4 %Rec	Sur 5 %Rec	Sur 6 %Rec	Sur 7 %Rec	Sur 8 %Rec
23412B1P13	104	97	89					
23412B1P13A	104	97	89					
23412MS	95	103	90					
23412MSD	101	104	96					
23412SP14	102	109	114					
IMV-001	110	102	113					
IMW-001	101	107	99					
IMW-002	102	102	109					
INK-001	100	99	94					
IOC-001	97	90	93					
QC limits:	88 - 110	86 - 115	86 - 118					

Sur 1: SS Toluene-d8
Sur 2: SS 4-Bromofluorobenzene
Sur 3: SS Dibromofluoromethane

* denotes surrogate recovery outside of QC limits.
D denotes surrogate recovery is outside of QC limits due to sample dilution, and is not considered an excursion.
A Lab ID consisting of a batch number with a B suffix is a method blank.
A Lab ID consisting of a batch number with a S suffix is an LCS.
A Lab ID with a MS suffix is a matrix spike.
A Lab ID with a MSD suffix is a matrix spike duplicate.

Report of Method Blank

Pace Analytical Services, Inc. - New Orleans

Organic Protocol - Single Batch

Lab ID: 23412B1P13 TCLP Leachate

Description: Leachate Method Blank | Episode: IMW | % Moisture: n/a

Method: Leachate GC/MS Volatile Organics | Batch: 23412 | Units: mg/l

Prep Factor: 1 | Leached: 7/31/97 | Prepared: | Analyzed: 14-Aug-97 0:08 KC

CAS Number	Parameter	Dilution	Result	Qu	Reporting Limit
71-43-2	Benzene	1	ND	C3	0.0500
78-93-3	2-Butanone (Methyl ethyl ketone)	1	ND	C3	0.100
56-23-5	Carbon tetrachloride	1	ND	C3	0.0500
108-90-7	Chlorobenzene	1	ND	C3	0.0500
67-66-3	Chloroform	1	ND	C3	0.0500
107-06-2	1,2-Dichloroethane (Ethylene dichloride)	1	ND	C3	0.0500
75-35-4	1,1-Dichloroethene (Dichloroethylene)	1	ND	C3	0.0500
127-18-4	Tetrachloroethene (Perchloroethylene)	1	ND	C3	0.0500
79-01-6	Trichloroethene (Trichloroethylene)	1	ND	C3	0.0500
75-01-4	Vinyl chloride (Chloroethene)	1	ND	C3	0.100

10 compound(s) reported

RECEIVED

ND denotes Not Detected at or above the reporting limit.
DF denotes Dilution Factor.
RL denotes sample Reporting Limit.
Qu lists qualifiers. Specific qualifiers are defined at the end of the report.

Report of Method Blank

Pace Analytical Services, Inc. - New Orleans

Organic Protocol - Single Batch

Lab ID: 23363B1 TCLP Leachate

Description: Leachate Method Blank **Episode:** IMW **% Moisture:** n/a

Method: Leachate GC/MS Semivolatile Organics **Batch:** 23363 **Units:** mg/l

Prep Factor: 1 **Leached:** 8/5/97 **Prepared:** 06-Aug-97 **Analyzed:** 08-Aug-97 12:22 JA

CAS Number	Parameter	Dilution	Result	Qu	Reporting Limit
106-46-7	1,4-Dichlorobenzene (p-Dichlorobenzene)	1	ND	C3	0.0400
51-28-5	2,4-Dinitrotoluene	1	ND	C3	0.0400
118-74-1	Hexachlorobenzene	1	ND	C3	0.0400
118-74-1	Hexachlorobutadiene	1	ND	C3	0.0400
67-72-1	Hexachloroethane	1	ND	C3	0.0400
95-48-7	2-Methylphenol (o-Cresol)	1	ND	C3	0.0400
108-39-4	3-Methylphenol (m-Cresol)	1	ND	C3	0.0400
106-44-5	4-Methylphenol (p-Cresol)	1	ND	C3	0.0400
98-95-3	Nitrobenzene	1	ND	C3	0.0400
87-86-5	Pentachlorophenol	1	ND	C3	0.100
110-86-1	Pyridine	1	ND	C3	0.0400
95-95-4	2,4,5-Trichlorophenol	1	ND	C3	0.100
88-06-2	2,4,6-Trichlorophenol	1	ND	C3	0.0400

13 compound(s) reported

RECEIVED

ND denotes Not Detected at or above the reporting limit.
DF denotes Dilution Factor.
RL denotes sample Reporting Limit.
Qu lists qualifiers. Specific qualifiers are defined at the end of the report.

Report of Quality Control

Pace Analytical Services, Inc. - New Orleans

Multiple Parameters - Multiple Batches

Episode: IMW

Parameter Name	Batch	Blank	Units	LCS Spike	LCS %Rec	LCSD %Rec	MS Spike	MS %Rec	MSD %Rec	Dup %RPD	QC Limits LCS	QC Limits MS/MSD	RPD Max	Qu
Arsenic	23384	ND	mg/l	5.00	85		5.00	100		0	80-120	50-150	100	
Barium	23384	ND	mg/l	5.00	89		5.00	95		7	80-120	50-150	36	
Cadmium	23384	ND	mg/l	1.00	92		1.00	98		0	80-120	50-150	100	
Chromium	23384	ND	mg/l	5.00	89		5.00	96		0	80-120	50-150	100	
Lead	23384	ND	mg/l	5.00	93		5.00	95		0	80-120	50-150	100	
Nickel	23384	ND	mg/l	1.00	96		1.00	103		0	80-120	50-150	100	
Selenium	23384	ND	mg/l	1.00	83		1.00	97		0	80-120	50-150	100	
Silver	23384	ND	mg/l	1.00	89		1.00	94		0	80-120	50-150	100	
Mercury	23385	ND	mg/l	0.0010	112		0.0010	106		0	80-120	50-150	60	

SEP 1 [illegible]
RECEIVED

=(Count([ParaCode])-1)&" parameter(s) reported"

8/14/97 17:08:12

* denotes recovery outside of QC limits.

Spike amounts are not corrected for moisture content of the spiked sample.

Report of Quality Control

Pace Analytical Services, Inc. - New Orleans

Multiple Parameters - Multiple Batches

Episode: IMW

Parameter Name	Batch	Blank	Units	LCS Spike	LCS %Rec	LCSD %Rec	MS Spike	MS %Rec	MSD %Rec	Dup %RPD	QC Limits LCS	QC Limits MS/MSD	RPD Max	Qu
pH-Corrosivity	23358	ND	S.U.	6.00	101					0	99-101		20	
Reactive Cyanide	23406	ND	mg/kg	100	22		100	18		0	1-30	0-30	20	
Reactive Sulfide	23406	ND	mg/kg	390	87		380	79		0	80-120	75-125	20	

SEP 1 [illegible]
RECEIVED

QA/QC SUMMARY

CONVENTIONAL PARAMETERS

PARAMETER	Matrix/Blank Spike Level	Blank Det'n Limits	Blank Units	Blank Conc.	Spike Recovery (%) Matrix	Spike Recovery (%) Blank	Replicate Precision RPD	QC Batch #
Ignitability	NA/NA	NA	°C	NA	NA	NA	0.0	23365

SEP 1
RECEIVED

Report Qualifiers

Pace Analytical Services, Inc. - New Orleans

Single Episode

Episode: IMW

Qualifier	Qualifier Description
C3	The result for this parameter is not corrected for moisture content except for TOCs, which are dried before analysis.
D2	The analysis was performed at a dilution due to the presence of matrix interferences.

SEP 1 0 1997
RECEIVED

Pace Analytical

389118

CHAIN-OF-CUSTODY RECORD
Analytical Request

Client: NAVAJO REFINING Co.	Report To:	Turn around Time: ☐ 24 Hours ☐ 48 Hours ☐ 3-5 Days ☐ 1 Week ☐ 2 Weeks ☐ Normal 14 Days	Pace Client No.
Address: 501 E. MAIN ARTESIA, NM 88210	Bill To:		Pace Project Manager
	P.O. # / Billing Reference		Pace Project No.
Phone	Project Name / No.		*Requested Due Date:

Sampled By (PRINT): BRYAN MADRID

Sampler Signature: Bryan Madrid — Date Sampled: 8/4/97

ITEM NO.	SAMPLE DESCRIPTION	TIME	MATRIX	PACE NO.	NO. OF CONTAINERS	UNPRESERVED	H_2SO_4	HNO_3	VOA (HCL)	NaOH	$Na_2S_2O_3$	ANALYSES REQUEST: TCLP-VOC	TCLP-SVOC	RCI	REMARKS
1	SEWER INSERTS	11:30	SLUDGE		3	3						X	X	X	
2	SULFUR GUARD	15:00	CATALYST		3	3						X	X	X	
3															
4															
5															
6															
7															
8															

COOLER NO.S	BAILERS	SHIPMENT METHOD OUT/DATE	SHIPMENT METHOD RETURNED/DATE

Additional Comments

ITEM NUMBER	RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME
	Bryan Madrid FCMI	8/4/97	16:15	FCMI		
				Pace Analytical Tulsa	8-5-97	1115

SAMPLE CONDITION

Temp: 2 °C	Received on Ice: (Y) / N	Sealed Cooler: (Y) / N	Samples Intact: (Y) / N	pH

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
FEB 24 1998
Environmental Bureau
Oil Conservation Division

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Triad Trucking
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E Main Artesia	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

Please see attached letter.

02-018

FEB 1998 Received Hobbs OCD

Estimated Volume 700 - 800 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Environmental Compliance Manager DATE: 02/20/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env Engr DATE: 2/23/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 2/24/98

TELEPHONE
(505) 748-3311

EASYLINK
62905278

Navajo REFINING COMPANY

501 EAST MAIN STREET • P. O. BOX 159
ARTESIA, NEW MEXICO 88211-0159

FAX
(505) 746-6410 ACCTG
(505) 746-6155 EXEC
(505) 748-9077 ENGR
(505) 746-4438 P / L

February 19, 1998

Ken Marsh
CRI Inc.
P.O. Box 369
Hobbs, NM 88241

Dear Mr. Marsh:

Enclosed you will find the analysis from a waste we are calling Tk 63 slurry. Tk 63 was cleaned out in December of 1996 and the sludge sent to your facility. It was resampled and reapproved on September of 1997. For the final clean out, we used the enclosed analysis to get approval from OCD. We are now planning to clean out a tank called Tk 62. This tank contains the exact same material as Tk 63 except that the slurry from Tk 62 has gone through the slingers. This means that the slurry has most of the cat fines slung out of it. We would like to use the above mentioned analysis to also get the material from Tk 62 approved for disposal. This tank is similar in size to Tk 63 and will have about 700 - 800 yards of waste in it. This material is tentatively scheduled to be hauled by Triad Trucking in 20 yard roll off bins.

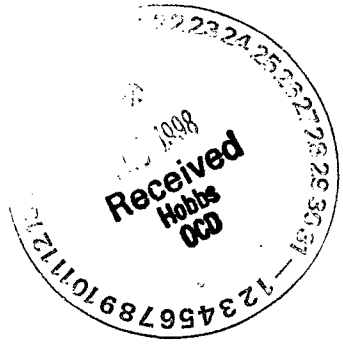
If you have any questions pertaining to this matter, please call me at (505) 748-3311. Thank you for your time.

Sincerely,

Bryan Madrid

Bryan Madrid
Environmental Specialist

Encl.



CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO.

Sources: PETROLEUM REFINING - TK 62 SLURRY

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING CO. concur with the status of the waste from the subject site.

Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 2/19/98

Pace Analytical

Pace Analytical Services, Inc.
161 James Drive West, Suite 100
St. Rose, LA 70087
Tel: 504-469-0333
Fax: 504-469-0555

Darrell Moore
Navajo Refining Co.
Post Office Box 159
Artesia, NM 88211

Project: TCLP'S
Site:
Episode: IUA

To: Darrell Moore

Enclosed please find the analytical results for sample(s) received by Pace Analytical Services, Inc. - New Orleans.

This report contains a summary of the quality control data associated with the analyses as well as copies of the chain-of-custody documents.

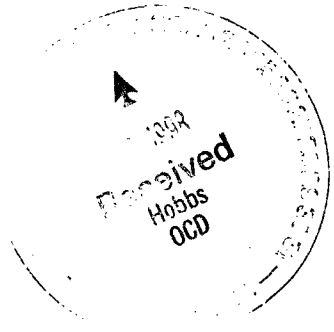
You may direct any inquires concerning this report to your Project Manager, or any one of the Project Managers listed below:

Ms. Karen H. Brown, Manager, Ext. 325
Mr. Craig McCollum, Ext. 326
Ms. Cindy Olavesen, Ext. 327

Sincerely,

Karen H Brown
Project Manager

9/10/97
Date



Enclosures

Pace Analytical Services, Inc. - New Orleans
Sample Cross Reference Summary

Episode: IUA Client: Navajo Refining Co.

Project: TCLP'S

Site:

Lab ID	Client ID	Description	Matrix	Collected	Received
IUA-001	TK63 SLURRY	SLUDGE	Other	08/29/97	08/30/97
IUA-002	T-501 VACUUM	TOWER COKE	Other	08/29/97	08/30/97

Report of Laboratory Analysis

Pace Analytical Services, Inc. - New Orleans

Single Sample - Protocol

Client ID: TK63 SLURRY
Client: NAVAJO REFINING CO.
Project: TCLP'S
Site: None
Lab ID: IUA-001 Leachate
Episode: IUA
Sample Qu:
Description: SLUDGE
Matrix: Other
% Moisture: n/a
Method: Leachate SW 8240 TCLP Volatile Organics
Batch: 23479
Units: mg/l

Prep Factor: 1.00
Leached: 9/3/97
Prepared:
Analyzed: 09-Sep-97 15:16 KC

CAS Number	Parameter	Dilution	Result	Qu	Reporting Limit	Reg. Limit
71-43-2	Benzene	2	0.133	D2 C3	0.100	0.500
78-93-3	2-Butanone (Methyl ethyl ketone)	2	ND	D2 C3	0.200	200
56-23-5	Carbon tetrachloride	2	ND	D2 C3	0.100	0.500
108-90-7	Chlorobenzene	2	ND	D2 C3	0.100	100
67-66-3	Chloroform	2	ND	D2 C3	0.100	6.00
107-06-2	1,2-Dichloroethane (Ethylene dichloride)	2	ND	D2 C3	0.100	0.500
75-35-4	1,1-Dichloroethene (Dichloroethylene)	2	ND	D2 C3	0.100	0.700
127-18-4	Tetrachloroethene (Perchloroethylene)	2	ND	D2 C3	0.100	0.700
79-01-6	Trichloroethene (Trichloroethylene)	2	ND	D2 C3	0.100	0.500
75-01-4	Vinyl chloride (Chloroethene)	2	ND	D2 C3	0.200	0.200

10 compound(s) reported

ND denotes Not Detected at or above the adjusted reporting limit.
DF denotes Dilution Factor of extract. The Prep Factor accounts for a non-routine sample size.
Reporting Limit is corrected for sample size, dilution and moisture content if applicable.
Qu lists qualifiers. Specific qualifiers are defined at the end of the report.
For moisture results, wet denotes result is not corrected for moisture and n/a denotes not applicable.

Report of Laboratory Analysis

Pace Analytical Services, Inc. - New Orleans

Single Sample - Protocol

Client ID: TK63 SLURRY
Client: NAVAJO REFINING CO.
Project: TCLP'S
Site: None
Lab ID: IUA-001 Leachate
Episode: IUA
Sample Qu:
Description: SLUDGE
Matrix: Other
% Moisture: n/a
Method: Leachate SW 8270 TCLP Semivolatile Organics
Batch: 23471
Units: mg/l

Prep Factor: 1.00
Leached: 9/3/97
Prepared: 04-Sep-97
Analyzed: 09-Sep-97 13:16 JA

CAS Number	Parameter	Dilution	Result	Qu	Reporting Limit	Reg. Limit
106-46-7	1,4-Dichlorobenzene (p-Dichlorobenzene)	1	ND	C3	0.0400	7.50
51-28-5	2,4-Dinitrotoluene	1	ND	C3	0.0400	0.130
118-74-1	Hexachlorobenzene	1	ND	C3	0.0400	0.130
118-74-1	Hexachlorobutadiene	1	ND	C3	0.0400	0.500
67-72-1	Hexachloroethane	1	ND	C3	0.0400	3.00
95-48-7	2-Methylphenol (o-Cresol)	1	0.283	C3	0.0400	200
108-39-4	3-Methylphenol (m-Cresol)	4	ND	A7 D1 C3	0.160	200
106-44-5	4-Methylphenol (p-Cresol)	4	0.622	D1 C3	0.160	200
98-95-3	Nitrobenzene	1	ND	C3	0.0400	2.00
87-86-5	Pentachlorophenol	1	ND	C3	0.100	100
110-86-1	Pyridine	1	ND	C3	0.0400	5.00
95-95-4	2,4,5-Trichlorophenol	1	ND	C3	0.100	400
88-06-2	2,4,6-Trichlorophenol	1	ND	C3	0.0400	2.00

13 compound(s) reported

ND denotes Not Detected at or above the adjusted reporting limit.
DF denotes Dilution Factor of extract. The Prep Factor accounts for a non-routine sample size.
Reporting Limit is corrected for sample size, dilution and moisture content if applicable.
Qu lists qualifiers. Specific qualifiers are defined at the end of the report.
For moisture results, wet denotes result is not corrected for moisture and n/a denotes not applicable.

Report of Laboratory Analysis

Pace Analytical Services, Inc. - New Orleans

Single Sample - Inorganic Parameters

Client ID: TK63 SLURRY
Client: NAVAJO REFINING CO.
Project: TCLP'S
Site: None
Lab ID: IUA-001 Leachate
Episode: IUA
Description: SLUDGE
Matrix: Other
%Moisture: n/a

ParameterName	Method	Batch	DF	PF	Result	Qu	Units	Reporting Limit	Prep.	Analysis		Reg. Limit
Arsenic	SW 6010	23585	1	1	ND	C3	mg/l	1.00	04-Sep-97	04-Sep-97	16:33 KJR	5.00
Barium	SW 6010	23585	1	1	ND	C3	mg/l	1.00	04-Sep-97	04-Sep-97	16:33 KJR	100
Cadmium	SW 6010	23585	1	1	ND	C3	mg/l	0.100	04-Sep-97	04-Sep-97	16:33 KJR	1.00
Chromium	SW 6010	23585	1	1	0.656	C3	mg/l	0.500	04-Sep-97	04-Sep-97	16:33 KJR	5.00
Lead	SW 6010	23585	1	1	ND	C3	mg/l	0.500	04-Sep-97	04-Sep-97	16:33 KJR	5.00
Mercury	SW 7470	23584	1	1	ND	C3	mg/l	0.0002	04-Sep-97	04-Sep-97	18:12 KJR	0.200
Selenium	SW 6010	23585	1	1	ND	C3	mg/l	0.200	04-Sep-97	04-Sep-97	16:33 KJR	1.00
Silver	SW 6010	23585	1	1	ND	C3	mg/l	0.500	04-Sep-97	04-Sep-97	16:33 KJR	5.00

8 parameter(s) reported

ND denotes Not Detected at or above the adjusted reporting limit.
DF denotes Dilution Factor of final sample. The Prep Factor accounts for a non-routine sample size.
Reporting Limit is corrected for sample size, dilution and moisture content if applicable.
Qu lists qualifiers. Specific qualifiers are defined at the end of the report.
For moisture results, wet denotes result is not corrected for moisture and n/a denotes not applicable.

Report of Laboratory Analysis

Pace Analytical Services, Inc. - New Orleans

Single Sample - Inorganic Parameters

Client ID: TK63 SLURRY
Client: NAVAJO REFINING CO.
Project: TCLP'S
Site: None
Lab ID: IUA-001
Episode: IUA
Description: SLUDGE
Matrix: Other
%Moisture: n/a

ParameterName	Method	Batch	DF	PF	Result	Qu	Units	Reporting Limit	Prep.	Analysis		Reg. Limit
pH-Corrosivity	SW 9045	23603	1	1	7.62	C3	S.U.			02-Sep-97	DM	
Reactive Cyanide	SW 7.3.3.2	23553	1	1	ND	C3	mg/kg	25.0	04-Sep-97	05-Sep-73	MH	
Reactive Sulfide	SW 7.3.4.2	23553	1	1	ND	C3	mg/kg	50.0	04-Sep-97	04-Sep-97	DM	

3 parameter(s) reported

ND denotes Not Detected at or above the adjusted reporting limit.
DF denotes Dilution Factor of final sample. The Prep Factor accounts for a non-routine sample size.
Reporting Limit is corrected for sample size, dilution and moisture content if applicable.
Qu lists qualifiers. Specific qualifiers are defined at the end of the report.
For moisture results, wet denotes result is not corrected for moisture and n/a denotes not applicable.

RCRA Characteristic - Ignitability

For non-liquid samples the EPA methods and guidelines for judging samples as meeting the characteristic of ignitability are ill- defined. For liquid samples, a closed cup flashpoint test is performed and this allows the determination of a flash temperature.

For the non-liquid samples the regulation specifically states:

> "It is not a liquid and is capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard" and there is no method referenced.

In order to determine whether samples meet this characteristic we have devised the following set of tests, and present the results of each component to our clients. As opposed to the temperature of flashpoint presented for liquid samples, only a YES or NO is provided as final data for the determination of non-liquid Ignitability.

Test Components

A)	sample undergoes spontaneous combustion	YES or NO
B)	sample ignites when moisture added (water)	YES or NO
C)	sample burns vigorously when lit with a flame (open container)	YES or NO
D)	sample ignites when agitated (friction)	YES or NO

Determination:

> If any of the A, B, or D components are YES the sample will be determined as Ignitable. If only C is YES, the sample would still NOT meet the criteria and the sample would be deemed NON IGNITABLE.

If you have any questions with regard to procedures or data, please contact our laboratory.

Analytical Results - Conventional Parameters

Navajo Refining Company

Non-Liquid Ignitability Data Sheet

Prepared Date: NA
Analyzed Date: 9/4/97 @ 16:00

Client ID/ Lab ID	Spontaneous Ignition	Ignitable With Moisture	Ignites When Agitated	Burns Vigorously When Lit	Meet Ignitable Characteristic
TK63 SLURRY SLUDGE (IUA-001)	No	No	No	No	No
T-501 VACUUM TOWER COKE (IUA-002)	No	No	No	No	No

Pace Analytical

389182

CHAIN-OF-CUSTODY RECORD
Analytical Request

Client: NAVAJO REFINING Co.	Report To:	Turn around Time: ☐ 24 Hours ☐ 48 Hours ☐ 3-5 Days ☐ 1 Week ☐ 2 Weeks ☐ Normal 14 Days	Pace Client No.
Address: 501 E. MAIN ARTESIA, NM 88210	Bill To:		Pace Project Manager
	P.O. # / Billing Reference		Pace Project No.
Phone	Project Name / No.		*Requested Due Date:

Sampled By (PRINT): BRYAN MADRID
Sampler Signature: Bryan Madrid
Date Sampled: 8-07-97

ITEM NO.	SAMPLE DESCRIPTION	TIME	MATRIX	PACE NO.	NO. OF CONTAINERS	PRESERVATIVES: UNPRESERVED	H_2SO_4	HNO_3	VOA (HCL)	NaOH	$Na_2S_2O_3$	ANALYSES REQUEST: TCLP-Voas	TCLP-Svoas	RCI	REMARKS
1	TR63 SLURRY SLUDGE	13:00			3	3						X	X	X	
2	T-501 VACUUM TOWER COKE	13:30			3	3						X	X	X	
3															
4															
5															
6															
7															
8															

COOLER NOS.	BAILERS	SHIPMENT METHOD OUT/DATE	SHIPMENT METHOD RETURNED/DATE

ITEM NUMBER	RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME
	Bryan Madrid Fed Ex	8/7/97	1615	Fed Ex Karen Hixson/Pace	8/8/97	0930

SAMPLE CONDITION

Temp: 2 °C	Received on Ice: (Y) N	Sealed Cooler: (Y) N	Samples Intact: (Y) N	pH

Additional Comments
T-501 FROM LOVINGTON

2°C ICAP

SEE REVERSE SIDE FOR INSTRUCTIONS

ORIGINAL

P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 8/8/95

Submit Original Plus 1 Copy to appropriate District Office

RECEIVED
FEB 24 1998
Environmental Bureau
Oil Conservation Division

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site El Paso & Artesia Facility
2. Management Facility Destination Controlled Recovery, INn.	6. Transporter Triad
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E Main Artesia	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajo Refining Artesia and El Paso facilities. The waste was generated by oil and gas transportation. I have included a chain of custody and a certificate of waste.

FEB 1998 Received Hobbs OCD

Mailed to Hobbs 2-24-98

Estimated Volume 20 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Office Manager DATE: 02/18/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env Engr DATE: 2/23/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 2/24/98

P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 8/8/95

Submit Original Plus 1 Copy to appropriate District Office

RECEIVED
MAR 11 1998
Environmental Bureau
Oil Conservation Division

1998 FEB 11 AM 8 55
RECEIVED
OCD - ARTESIA

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site El Paso & Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Triad
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E Main Artesia	New Mexico

1998 FEB 11 AM 8 55
RECEIVED
OCD - ARTESIA

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajo Refining Artesia and El Paso facilities. The waste was generated by oil and gas transportation. I have included a chain of custody and a certificate of waste.

FEB 1998
Received
Hobbs
OCD

Att: Tim Please review & Forward To S.F.
bl

Estimated Volume 20 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo Waste Management Facility Authorized Agent TITLE: Office Manager DATE: 02/18/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: [signature] TITLE: Env. Engr DATE: 2/23/98 *

APPROVED BY: _____ TITLE: _____ DATE: _____

* ON CONDITION THAT THE NMED STATEMENT MEETS OCD STANDARD FOR

Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Submit Original Plus 1 Copy to appropriate District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☒ MJK No ☐	5. Originating Site El Paso & Artesia Facility
2. Management Facility Destination Controlled Recovery, INn.	6. Transporter Triad
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E Main Artesia	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajo Refining Artesia and El Paso facilities. The waste was generated by oil and gas transportation. I have included a chain of custody and a certificate of waste.

Estimated Volume 20 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo Waste Management Facility/Authorized Agent TITLE: Office Manager DATE: 02/18/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: _____

APPROVED BY: Martyn J Kirby TITLE: Env Geologist DATE: 2-24-98

Faxed to CRI 2-24-98 MJK

Please Deliver This Fax To:

Billie Chavo

(505)(393-3615

From:

Martyne Kieling

Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505
(505) 827-7131 Office
(505) 827-8177 Fax

Date: 2-24-98

Pages: one of 2

Subject: C-138 Navajo Artesia

(If you have trouble receiving this fax, please call the phone number above.)

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1557
Fax (505) 827-1544

GARY E. JOHNSON
GOVERNOR

MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

November 10, 1997

Mr. Darrell Moore
Environmental Manager for Water and Waste
Navajo Refining Company
P.O. Box 159
Artesia, New Mexico 88211-0159

Dear Mr. Moore:

RE: Disposal of Pipeline Filters

Based on the information Navajo Refining Company (NRC), has provided on the above captioned subject, the New Mexico Environment Department (NMED), Hazardous and Radioactive Materials Bureau (HRMB), finds that your knowledge of process (KOP) is sufficient at this point in time to support a non-hazardous waste designation for these filters. However, NMED must point out that should any changes be made to the "process" or "processes" which generate this waste, NRC must perform another hazardous waste determination on the filters affected. NMED/HRMB may also sample this waste stream at periodic intervals in the future as well.

If you have any further questions or if I can be of any other assistance, please call me at (505) 827-1508.

Sincerely,

John M. Tymkowych

John M. Tymkowych
RCRA Inspection/Enforcement Program Manager
Hazardous and Radioactive Materials Bureau

cc: Benito J. Garcia, Chief HRMB
Navajo, Blue, 1997

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

March 25, 1997

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

Billie Charo-office Mgr.
Controlled Recovery, Inc. (CRI)
P.O. Box 369
Hobbs, NM 88241

Re: C-138 submittal dated 03/19/97 Navajo Refining pipeline filters generated from transporting refined products.

Dear Ms. Charo,

New Mexico Oil Conservation Division (NMOCD) has reviewed the above referenced submittal and **your request is hereby denied.**

Please note the NMOCD based the decision on the submitted documents and telephone conversations with the generator's representative Mr. Darrell Moore.

It is the NMOCD's understanding that ten to twenty percent of the pipeline filters could fail the TCLP test for arsenic. We also understood that these filters were to be disposed of as is into the CRI landfill. While 80 percent of the filters would be RCRA non-hazardous the other 20 percent would possibly be hazardous waste. These hazardous filters would retain their original state as a "used filter" when disposal occurred.

Therefore, the composite analysis performed in the laboratory does not appear to properly represent the actual waste stream.

Please note CRI's permit does not allow for this type of waste to be disposed of into your facility.

If you require any further assistance concerning this matter please do not hesitate to call (505-393-6161) or write.

Sincerely yours,

Wayne Price-Environmental Engineer

cc: Jerry Sexton-NMOCD District I Supervisor
Roger Anderson-NM NMOCD Environmental Bureau Chief, Santa Fe

attachments-1 C-138 submittal

(505) 393-6161
241-1980
(505) 748-1283
10
(505) 334-6178
Brazos Road
cc, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 8/8/95

Submit Original
Plus 1 Copy
to appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site El Paso & Artesia Facility
2. Management Facility Destination Controlled Recovery, INn.	6. Transporter Triad
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E Main Artesia	New Mexico

9. Circle One:

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All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajo Refining Artesia and El Paso facilities. The waste was generated by oil and gas transportation. I have included a chain of custody and a certificate of waste.

DENIED

SEE RESPONSE LETTER DATED 3/25/97

OCD HOBBS OFFICE
MAR 19 1997
RECEIVED

Estimated Volume 20 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Office Manager DATE: 03/19/97

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: _____

APPROVED BY: _____ TITLE: _____ DATE: _____

TELEPHONE
(505) 748-3311

EASYLINK
62905278

REFINING COMPANY

501 EAST MAIN STREET • P. O. BOX 159
ARTESIA, NEW MEXICO 88211-0159

FAX
(505) 746-6410 ACCTG
(505) 746-6155 EXEC
(505) 748-9077 ENGR
(505) 746-4438 P / L

March 17, 1997

Ken Marsh
CRI Inc.
P.O. Box 369
Hobbs, NM 88241

Dear Ken,

Navajo Refining would like to get approval to put a stream of waste that we call **Pipeline Cartridge Filters** into Navajo's cell at your facility. We have been handling these filters as hazardous waste because of the arsenic content. Through several episodes of sampling (analysis attached), arsenic is the only constituent that these filters have busted the TCLP guidelines. These samples were taken from individual filters, meaning that each TCLP analysis was a single filter.

Navajo's management decided to treat the filters as a whole composite group instead of each single filter. This decision was made in December, 1996 so each set of analysis after that date is a composite result from several filters. Six to seven filters were selected at random from each batch of approximately 200 filters. On each result using this technique, the arsenic level is well below RCRA standards.

I have enclosed our most recent analysis using the single filter method and all subsequent sampling using the composite method. You will notice that the composite samples only tested for TCLP Arsenic since that was the constituent of concern.

These filters will be shipped by Triad Transportation in 20 yard roll-off bins. As always if there are any questions, please call me at 505-748-3311. Thanks for your time in this matter.

Sincerely,
Navajo Refining Co.

Darrell Moore

Darrell Moore
Sr. Environmental Specialist

Encl.

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: El Paso and Artesia Navajo Refining Co.

Sources: Petroleum Refining - Pipeline Cartridge Filters

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for Navajo Refining Co. concur with the status of the waste from the subject site.

Name Darrell Moore

Title/Agency Sr. Env. Spec.

Address 501 E. Main

Artesia NM 88210

Signature Darrell Moore

Date 3/17/97

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Darrell Moore
501 E. Main
Artesia, NM 88210

August 9, 1995
Receiving Date: 07/25/95
Sample Type: Filter
Project No: NA
Project Location: El Paso, TX

Extraction Date: 07/25/95
Analysis Date: 07/27/95
Sampling Date: 07/24/95
Sample Condition: Intact & Cool
Sample Received by: MS
Project Name: NA

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cr	Cd	Pb	Ba	Ag	Hg
	EPA LIMIT =	5.0	1.0	5.0	1.0	5.0	100.0	5.0	0.20
T38998	JP-8 Filter PD 8" F-1A	3.0	<0.2	<0.1	<0.1	<0.1	<1.0	<0.01	<0.01
QC	Quality Control	4.9	4.8	4.7	4.6	4.7	4.5	5.3	0.05
Reporting Limit		0.1	0.2	0.1	0.1	0.1	1.0	0.01	0.01
RPD		6	2	0	2	2	0	16	4
% Extraction Accuracy		76	97	89	84	85	89	93	96
% Instrument Accuracy		97	96	94	91	94	90	106	101

METHODS: EPA SW 846-1311, 6010, 7471.
TCLP METALS SPIKE: 4.0 mg/L As, Se, Cr, Cd, Pb, Ba; 1.0 mg/L Ag; 0.05 mg/L Hg.
TCLP METALS QC: 5.0 mg/L As, Se, Cr, Cd, Pb, Ba, Ag; 0.05 mg/L Hg.

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

8-9-95
Date

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Darrell Moore
501 E. Main
Artesia, NM 88210

August 9, 1995
Receiving Date: 07/25/95
Sample Type: Filter
Project No: NA
Project Location: El Paso, TX

Extraction Date: 07/25/95
Analysis Date: 07/27/95
Sampling Date: 07/24/95
Sample Condition: I & C
Sample Received by: MS
Project Name: NA

TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T38998 JP-8 Filter PD 8" F-1A	QC	RPD	%EA	%IA
Vinyl chloride	0.20	0.1	ND	0.048	7	94	96
1,1-Dichloroethene	0.70	0.1	ND	0.057	0	108	114
Methyl Ethyl Ketone	200.0	1.0	ND	0.053	12	120	106
Chloroform	6.00	0.1	ND	0.051	3	99	102
1,2-Dichloroethane	0.50	0.1	ND	0.051	6	97	102
Benzene	0.50	0.1	ND	0.054	0	96	108
Carbon Tetrachloride	0.50	0.1	ND	0.055	2	105	110
Trichloroethene	0.50	0.1	ND	0.053	1	97	106
Tetrachloroethene	0.70	0.1	ND	0.054	6	103	108
Chlorobenzene	100.00	0.1	ND	0.053	2	101	106
1,4-Dichlorobenzene	7.50	0.1	ND	0.053	3	103	106

SURROGATES	% Recovery
Dibromofluoromethane	101
Toluene-d8	98
4-Bromofluorobenzene	98

ND = Not Detected

METHODS: EPA SW 846-1311, 8240.

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

8-9-95
DATE

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Darrell Moore
501 E. Main
Artesia, NM 88210

August 9, 1995
Receiving Date: 07/25/95
Sample Type: Filter
Project No: NA
Project Location: El Paso, TX

Extraction Date: 07/27/95
Analysis Date: 08/02/95
Sampling Date: 07/24/95
Sample Condition: I & C
Sample Received by: MS
Project Name: NA

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T38998 JP-8 Filter PD 8" F-1A	RPD	%EA	QC	%IA
Pyridine	5.0	0.001	ND	16	53	47.1	94
1,4-Dichlorobenzene	7.5	0.001	ND	6	71	49.5	99
o-Cresol	200.0	0.05	0.091	12	61	46.2	92
m,p-Cresol	200.0	0.05	0.156	4	75	50.5	101
Total Cresol	200.0	0.1	0.247	6	64	96.7	97
Hexachloroethane	3.0	0.001	ND	10	58	46.6	93
Nitrobenzene	2.0	0.001	ND	2	88	50.5	101
Hexachlorobutadiene	0.5	0.001	ND	2	83	54.5	109
2,4,6-Trichlorophenol	2.0	0.1	ND	12	73	48.3	99
2,4,5-Trichlorophenol	400.0	01	ND	6	78	53.7	107
2,4-Dinitrotoluene	0.13	0.001	ND	30	60	40.1	80
2,4-D	10.0	0.01	ND	16	73	47.4	95
Hexachlorobenzene	0.13	0.001	ND	8	81	53.6	107
2,4,5-TP	1.0	0.01	ND	4	85	52.8	106
Pentachlorophenol	100.0	0.001	ND	26	64	43.2	86
Lindane	0.4	0.001	ND	28	75	53.9	108
Total Heptachlor	0.008	0.001	ND	16	59	98.3	98
Endrin	0.02	0.001	ND	24	76	50.5	101
Methoxychlor	10.0	0.001	ND	6	72	54.3	108
Chlordane	0.03	0.0002	ND	36	105	0.500	100
Toxaphene	0.5	0.005	ND	2	100	4.980	100

Surrogates	% RECOVERY
2-Fluorophenol	64
Phenol-d6	39
Nitrobenzene-d5	32
2-Fluorobiphenyl	76
2,4,6-Tribromophenol	88
Terphenyl-d14	88

Methods: EPA SW 846-1311, 8270, 8080.
ND - Not Detected

8-9-95

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell
DATE

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Darrell Moore
501 E. Main
Artesia, NM 88210

August 9, 1995
Receiving Date: 07/25/95
Sample Type: Filter
Project No: NA
Project Location: El Paso, TX

Extraction Date: 07/25/95
Analysis Date: 07/27/95
Sampling Date: 07/24/95
Sample Condition: Intact & Cool
Sample Received by: MS
Project Name: NA

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cr	Cd	Pb	Ba	Ag	Hg
	EPA LIMIT =	5.0	1.0	5.0	1.0	5.0	100.0	5.0	0.20
T38997	El Paso PD Filter F-1 Gasoline 8"	5.4	<0.2	<0.1	<0.1	<0.1	<1.0	<0.01	<0.01
QC	Quality Control	4.9	4.8	4.7	4.6	4.7	4.5	5.3	0.05
Reporting Limit		0.1	0.2	0.1	0.1	0.1	1.0	0.01	0.01
RPD		6	2	0	2	2	0	16	4
Extraction Accuracy		76	97	89	84	85	89	93	96
% Instrument Accuracy		97	96	94	91	94	90	106	101

METHODS: EPA SW 846-1311, 6010, 7471.
TCLP METALS SPIKE: 4.0 mg/L As, Se, Cr, Cd, Pb, Ba; 1.0 mg/L Ag; 0.05 mg/L Hg.
TCLP METALS QC: 5.0 mg/L As, Se, Cr, Cd, Pb, Ba, Ag; 0.05 mg/L Hg.

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

8-9-95
Date

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Darrell Moore
501 E. Main
Artesia, NM 88210

August 9, 1995
Receiving Date: 07/25/95
Sample Type: Filter
Project No: NA
Project Location: El Paso, TX

Extraction Date: 07/25/95
Analysis Date: 07/27/95
Sampling Date: 07/24/95
Sample Condition: I & C
Sample Received by: MS
Project Name: NA

TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T38997 El Paso PD Filter F-1 Gasoline 8"	QC	RPD	%EA	%IA
vl chloride	0.20	0.1	ND	0.048	7	94	96
chloroethene	0.70	0.1	ND	0.057	0	108	114
yl Ethyl Ketone	200.0	1.0	ND	0.053	12	120	106
Chloroform	6.00	0.1	ND	0.051	3	99	102
1,2-Dichloroethane	0.50	0.1	ND	0.051	6	97	102
Benzene	0.50	0.1	0.15	0.054	0	96	108
Carbon Tetrachloride	0.50	0.1	ND	0.055	2	105	110
Trichloroethene	0.50	0.1	ND	0.053	1	97	106
Tetrachloroethene	0.70	0.1	ND	0.054	6	103	108
Chlorobenzene	100.00	0.1	ND	0.053	2	101	106
1,4-Dichlorobenzene	7.50	0.1	ND	0.053	3	103	106

SURROGATES	% Recovery
Dibromofluoromethane	102
Toluene-d8	98
4-Bromofluorobenzene	99

ND = Not Detected

METHODS: EPA SW 846-1311, 8240.

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

8-9-95
DATE

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Lubbock, Texas 79424
806•794•1296
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ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Darrell Moore
501 E. Main
Artesia, NM 88210

August 9, 1995
Receiving Date: 07/25/95
Sample Type: Filter
Project No: NA
Project Location: El Paso, TX

Extraction Date: 07/27/95
Analysis Date: 08/02/95
Sampling Date: 07/24/95
Sample Condition: I & C
Sample Received by: MS
Project Name: NA

T38997

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	El Paso PD Filter F-1 Gasoline 8"	RPD	%EA	QC	%IA
Pyridine	5.0	0.001	0.003	16	53	47.1	94
1,4-Dichlorobenzene	7.5	0.001	ND	6	71	49.5	99
o-Cresol	200.0	0.05	0.204	12	61	46.2	92
m,p-Cresol	200.0	0.05	0.467	4	75	50.5	101
Total Cresol	200.0	0.1	0.671	6	64	96.7	97
Hexachloroethane	3.0	0.001	ND	10	58	46.6	93
Nitrobenzene	2.0	0.001	ND	2	88	50.5	101
Hexachlorobutadiene	0.5	0.001	ND	2	83	54.5	109
',6-Trichlorophenol	2.0	0.1	ND	12	73	48.3	99
,5-Trichlorophenol	400.0	01	ND	6	78	53.7	107
2,4-Dinitrotoluene	0.13	0.001	ND	30	60	40.1	80
2,4-D	10.0	0.01	ND	16	73	47.4	95
Hexachlorobenzene	0.13	0.001	ND	8	81	53.6	107
2,4,5-TP	1.0	0.01	ND	4	85	52.8	106
Pentachlorophenol	100.0	0.001	ND	26	64	43.2	86
Lindane	0.4	0.001	ND	28	75	53.9	108
Total Heptachlor	0.008	0.001	ND	16	59	98.3	98
Endrin	0.02	0.001	ND	24	76	50.5	101
Methoxychlor	10.0	0.001	ND	6	72	54.3	108
Chlordane	0.03	0.0002	ND	36	105	0.500	100
Toxaphene	0.5	0.005	ND	2	100	4.980	100

Surrogates	% RECOVERY
2-Fluorophenol	68
Phenol-d6	38
Nitrobenzene-d5	53
2-Fluorobiphenyl	73
2,4,6-Tribromophenol	88
Terphenyl-d14	86

Methods: EPA SW 846-1311, 8270, 8080.
ND - Not Detected

8-9-95

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

DATE

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING CO.
Attention: Darrell Moore
501 E. Main
Artesia, NM 88210

February 17, 1997
Receiving Date: 02/04/97
Sample Type: Cartridge Filters
Project No: NA
Project Location: Artesia, NM

Prep Date: 02/16/97
Analysis Date: 02/16/97
Sampling Date: 02/03/97
Sample Condition: Intact
Sample Received by: JH
Project Name: NA

TA#	FIELD CODE	TCLP As (mg/L)
	EPA LIMIT =	5.0
T66926	Pipeline Cartridge Filters (Artesia)	<1.0
QC	Quality Control	5.3
REPORTING LIMIT		1.0
RPD		0
% Extraction Accuracy		90
% Instrument Accuracy		106

METHODS: EPA SW 846-1311, 6010.
CHEMIST: RR
TCLP As SPIKE: 2.0 mg/L TCLP As.
TCLP As QC: 5.0 mg/L TCLP As.

BB

2-17-97

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

DATE

TraceAnalysis, Inc.

6701 Aberdeen Avenue Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378-1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: Darrell Moore
Phone #:
FAX #:

Company Name & Address: Navajo Refining Co.

Project #:
Project Name :

Project Location: Artesia NM
Sampler Signature: Darrell Moore

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	Other	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME
60926	Pipeline Cartridge Filters (Artesia)	5						X					2/3/97	13:00

ANALYSIS REQUEST

BTEX, MTBE	TPH	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	8240 / 8260	8270	X TCLP As

SPECIAL HANDLING

Turn around # of days	Fax ASAP	Hold

Relinquished by: Date: Time:
Received by: Date: Time:

Relinquished by: Date: Time:
Received by: Date: Time:

Relinquished by: Date: Time:
Received at Laboratory by: J. O. Harrell Date: 2/4/97 Time: 10:10A

REMARKS
We need results ASAP
Make a composite sample from the five filters
(F) 2-18-97

I

35AL

...Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING CO.
Attention: Darrell Moore
501 E. Main
Artesia, NM 88210

January 22, 1997
Receiving Date: 01/18/97
Sample Type: Cartridge Filters
Project No: NA
Project Location: El Paso, TX

Prep Date: 01/20/97
Analysis Date: 01/22/97
Sampling Date: 01/17/97
Sample Condition: Intact & Cool
Sample Received by: DH
Project Name: NA

TA#	FIELD CODE	TCLP As (mg/L)
	EPA LIMIT =	5.0
T65963	Pipeline Cartridge Filters	<1.0
QC	Quality Control	4.8
REPORTING LIMIT		1.0
RPD		11
% Extraction Accuracy		106
% Instrument Accuracy		95

METHODS: EPA SW 846-1311, 6010.
CHEMIST: RR
TCLP As SPIKE: 2.0 mg/L TCLP As.
TCLP As QC: 5.0 mg/L TCLP As.

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

1-22-97
DATE

65963

220

TraceAnalysis, Inc.

6701 Aberdeen Avenue Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: Darrell Moore

Phone #: 505-748-3311

FAX #: 505-748-9077

Company Name & Address: Navajo Refining

Project #:

Project Name :

Project Location: El Paso TX

Sampler Signature: Darrell Moore

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	Other	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME
65963	Pipeline Cartridge Filters							X					1/17/96	15:00

ANALYSIS REQUEST

BTEX, MTBE	TPH	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	8240 / 8260	8270	TCLP As (Composite)
									X

SPECIAL HANDLING

Turn around # of days	Fax ASAP	Hold

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Darrell Moore	1/17/96	16:15			
Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received at Laboratory by:	1-18-97	10:15

REMARKS

Composite of all elements. One analysis. Need results ASAP

C/T

1-20

018ag

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING CO.
Attention: Darrell Moore
501 E. Main
Artesia, NM 88210

October 18, 1996
Receiving Date: 10/17/96
Sample Type: Filters
Project No: NA
Project Location: El Paso, TX

Extraction Date: 10/17/96
Analysis Date: 10/18/96
Sampling Date: 10/16/96
Sample Condition: Intact & Cool
Sample Received by: ML
Project Name: NA

TA#	Field Code	TCLP As (mg/L)
T60621	Cartridge Filters-El Paso	<0.10
QC	Quality Control	4.81
Reporting Limit		0.10
RPD		0
% Extraction Accuracy		104
% Instrument Accuracy		96

METHODS: EPA SW 846-1311, 6010.
CHEMIST: RR
TCLP As SPIKE: 8.0 mg/L TCLP As.
TCLP As QC: 5.0 mg/L TCLP As.

10-18-96

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

Date

TraceAnalysis, Inc.

6701 Aberdeen Avenue Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS R[illegible]T

Project Manager: Darrell Moore

Phone #:

FAX #:

Company Name & Address: Navajo Refining

Project #:

Project Name :

Project Location: El Paso, Tx

Sampler Signature: Darrell Moore

ANALYSIS REQUEST

[illegible]CIAL
[illegible]DLING

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX					PRESERVATIVE METHOD					SAMPLING		BTEX, MTBE	TPH	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	8240 / 8260	8270	TCLP Pb					Fa	HOLD
				WATER	SOIL	AIR	SLUDGE		HCL	HNO3	ICE	NONE		DATE	TIME																
	Carbon Filters El Paso							X				X		10/16/96	14:20										X						

Relinquished by: Darrell Moore Date: 10/16/96 Time: 16:15

Received by: Date: Time:

REMARKS
Need a composite sample of the six filters. Due result.

Relinquished by: Date: Time:

Received by: Date: Time:

Relinquished by: Date: Time:

Received at Laboratory by: Date: Time:

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING CO.
Attention: Darrell Moore
501 E. Main
Artesia, NM 88210

November 12, 1996
Receiving Date: 11/01/96
Sample Type: Cartridge Filters
Project No: NA
Project Location: NA

Prep Date: 11/06/96
Analysis Date: 11/11/96
Sampling Date: 10/31/96
Sample Condition: Intact & Cool
Sample Received by: ML
Project Name: NA

TA#	FIELD CODE	TCLP As (mg/L)
	EPA LIMIT =	5.0
T61451	Cartridge Filters - El Paso	<0.10
QC	Quality Control	5.32
REPORTING LIMIT		0.10
RPD		3
% Extraction Accuracy		105
% Instrument Accuracy		106

METHODS: EPA SW 846-1311, 6010.
CHEMIST: RR
TCLP As SPIKE: 1 mg/L TCLP As.
TCLP As QC: 5 mg/L TCLP As.

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

11-12-96
DATE

61449-51

TraceAnalysis, Inc.

6701 Aberdeen Avenue Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS RE[illegible]T

Project Manager: Darrell Moore
Phone #: 505-748-3311
FAX #: 505-748-9077

Company Name & Address: Navajo Refining Co.

Project #:
Project Name :

Project Location:
Sampler Signature: Darrell Moore

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	other	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME
61449	Alky Cooling Twr Inlet	2		X					X		X		10/31/96	14:15
50	" " " Outlet	"		"					"		"		" "	14:30
51	Cartridge Filters - El Paso							X				X	10/31/96	14:40

ANALYSIS REQUEST

BTEX, MTBE	TPH	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	8240 / 8260	8270	TCLP As
			See			List			
			"				"		
									X

SPECIAL HANDLING

Turn around # of days
Fax ASAP
Hold

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Darrell Moore	10/31/96	16:15			
Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received at Laboratory by:	Date:	Time:
			M Rogers	11-1-96	11:30

REMARKS:
Cartridge Filters need to be composited.
We want one result.

11-13

CI

[illegible]

3010A TI

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING CO.
Attention: Darrell Moore
501 E. Main
Artesia, NM 88210

November 15, 1996
Receiving Date: 11/09/96
Sample Type: Cartridge Filters
Project No: NA
Project Location: El Paso

Prep Date: 11/12/96
Analysis Date: 11/14/96
Sampling Date: 11/08/96
Sample Condition: Intact & Cool
Sample Received by: DH
Project Name: NA

TA#	FIELD CODE	TCLP As (mg/L)
	EPA LIMIT =	5.0
T62133	Filter Pile - Cartridge Filters	<0.10
T62134	Bin #3 - Cartridge Filters	<0.10
QC	Quality Control	2.51
REPORTING LIMIT		0.10
RPD		4
% Extraction Accuracy		95
% Instrument Accuracy		105

METHODS: EPA SW 846-1311, 6010.
CHEMIST: RR
TCLP As SPIKE: 1 mg/L TCLP As.
TCLP As QC: 2.4 mg/L TCLP As.

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

11-15-96
DATE

TraceAnalysis, Inc.

6701 Aberdeen Avenue Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: Darrell Moore

Phone #:

FAX #:

Company Name & Address: Navajo Refining

Project #:

Project Name :

Project Location: El Paso

Sampler Signature: Darrell Moore

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	Filter	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME
	Filter Pile - Cartridge Filters							X					11/8/96	11:00
	Bin #3 - Cartridge Filters							X					" "	11:10

ANALYSIS REQUEST

BTEX, MTBE	TPH	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	8240 / 8260	8270	TCLP 1
									X
									X

Turn around # of days

SPECIAL HANDLING

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Darrell Moore	11/8/96	16:15			
Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received at Laboratory by:	Date:	Time:

REMARKS

Need results as soon as possible.

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Darrell Moore
501 E. Main
Artesia, NM 88210

February 25, 1997
Receiving Date: 02/17/97
Sample Type: Filter
Project No: NA
Project Location: El Paso

Prep Date: 02/21/97
Analysis Date: 02/21/97
Sampling Date: 02/14/97
Sample Condition: Intact
Sample Received by: JH
Project Name: NA

TA#	FIELD CODE	TCLP As (mg/L)
	EPA LIMIT =	5.0
T67747	Pipeline Cartridge Filters	0.49
QC	Quality Control	5.0
REPORTING LIMIT		0.10
RPD		4
% Extraction Accuracy		105
% Instrument Accuracy		100

METHODS: EPA SW 846-1311, 6010.
CHEMIST: RR
TCLP As SPIKE: 2.0 mg/L TCLP As.
TCLP As QC: 5.0 mg/L TCLP As.

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

2-25-97
DATE

67747

237

TraceAnalysis, Inc.

6701 Aberdeen Avenue Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: Darrell Moore
Phone #:
FAX #:

Company Name & Address: Navajo Refining

Project #:
Project Name :

Project Location: El Paso
Sampler Signature: Darrell Moore

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	Other	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE		SAMPLING: DATE	TIME	BTEX, MTBE	TPH	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	8240 / 8260	8270	TCLP As
67747	Pipeline Cartridge Filters							X				X		2/14/97	14:00										X

ANALYSIS REQUEST

SPECIAL HANDLING: Turn around # of days; Fax ASAP; Hold

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Darrell Moore	2/14/97	16:15			
Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received at Laboratory by: Q. Q. Hardell	Date: 2/17/97	Time: 0:35

REMARKS: Need results ASAP.

0.25

61T

4 OF 6

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-1
Originated 8/

RECEIVED
FEB 20 1998
Environmental Bureau
Oil Conservation Division

Submit Orig
Plus 1 C
to appropr
District Of

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Triad
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E Main Artesia	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajo Refining Artesia facility. The desulferized catalyst was generated by a change out of the dusulfurizer reactor. I have included a certificate of waste and a chain of custody.

02-012

Mailed to Hobbs 2/23/98

Att: Tim Gum, please review & send to Martyne Kieling - S.F. Thanks Carlene!

Estimated Volume 70 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Office Manager DATE: 02/12/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: [signature] TITLE: ENVR ENGR DATE: 2/16/98

APPROVED BY: [signature] TITLE: Env Geologist DATE: 2/20/98

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
MAR 11 1998
Environmental Bureau
Oil Conservation Division

1998 FEB
RECEIVED
OCD - ARTESIA

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Triad
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E Main Artesia	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajo Refining Artesia facility. The desulferized catalyst was generated by a change out of the dusulfurizer reactor. I have included a certificate of waste and a chain of custody.

02-012

ATT: TIM EUM, PLEASE REVIEW & SEND TO MARTY MURLING - S.F. THANKS Billie Charo

FEB 1998
Received
Hobbs
OCD

Estimated Volume 70 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo Waste Management Facility Authorized Agent TITLE: Office Manager DATE: 02/12/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR DATE: 2/16/98

APPROVED BY: _____ TITLE: _____ DATE: _____

TELEPHONE
(505) 748-3311

EASYLINK
62905278

REFINING COMPANY

501 EAST MAIN STREET • P. O. BOX 159
ARTESIA, NEW MEXICO 88211-0159

FAX
(505) 746-6410 ACCTG
(505) 746-6155 EXEC
(505) 748-9077 ENGR
(505) 746-4438 P / L

February 10, 1998

Ken Marsh
CRI Inc.
P.O. Box 369
Hobbs, NM 88241

Dear Mr. Marsh:

A recent change out of desulfurized catalyst from our desulfurizer reactor (D-64) resulted in the accumulation of approximately 70 yards of media that I would like to get profiled into your facility. Enclosed you will find a TCLP analysis performed by Trace Analysis Inc. along with a Certificate of Waste Status.

In our Naphtha Unit, naphtha from our Crude Units in Artesia and Lovington is combined with hydrogen, heated, and then passed through the reactor. Sulfur is stripped from the naphtha in the reactor and sent on for further treatment. Over time, the catalyst in the reactor needs to be changed out to improve efficiency. This waste is stored in 21 flow bins and will be shipped to your facility by Triad Trucking.

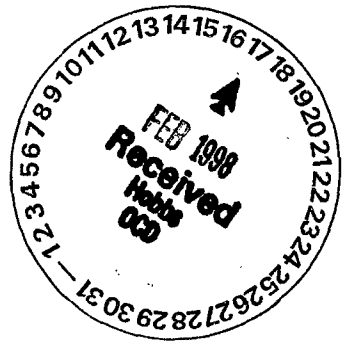
If you have any questions, please call me at (505) 748-3311. Thank you for your time in this matter.

Sincerely,

Bryan Madrid

Bryan Madrid
Environmental Specialist

Encl.



FEB 1998
Received
Hobbs
OCD

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING Co.

Sources: PETROLEUM REFINING – DESULFURIZED CATALYST

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING Co. concur with the status of the waste from the subject site.

Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 2/9/98

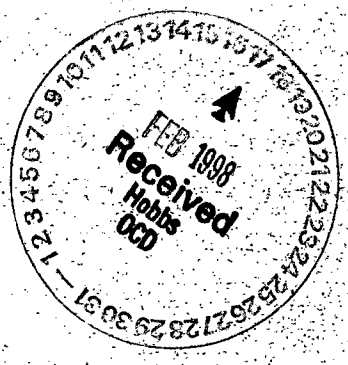
6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Dec 08, 1997
Date Rec: 11/24/97
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9712000033
Sampling Date: 11/24/97
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Vol in Solid (mg/L)	EPA Limit	Reporting Limit	Method Blank	T86403 Desulf. Catalyst	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	86	2	101	86
1,1-Dichloroethene	0.7	0.05	ND	ND	88	8	85	88
Methyl Ethyl Ketone	200.0	0.50	ND	ND	80	9	84	80
Chloroform	6.0	0.05	ND	ND	88	7	96	88
1,2-Dichloroethane	0.5	0.05	ND	ND	87	9	92	87
Benzene	0.5	0.05	ND	0.05	87	7	94	87
Carbon Tetrachloride	0.5	0.05	ND	ND	104	5	105	104
Trichloroethene	0.5	0.05	ND	ND	87	5	97	87
Tetrachloroethane	0.7	0.05	ND	ND	83	6	96	83
Chlorobenzene	100.0	0.05	ND	ND	84	6	90	84
1,4-Dichlorobenzene	7.5	0.05	ND	ND	85	7	93	85



	% RECOVERY
Dibromofluoromethane	106
Toluene-d8	102
4-Bromofluorobenzene	101

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	12/2/97	EPA 8260	12/3/97	RW	100 ea	100 ea

Director, Dr. Blair Leftwich

12-8-97
Date

TRACE ANALYSIS, INC.
An Institute for Advanced Environmental Research and Analysis

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Dec 08, 1997
Date Rec: 11/24/97
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9712000033
Sampling Date: 11/24/97
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Semivolatiles in Solid (mg/L)	EPA Limit	Reporting Limit	Method Blank	T86403 Desulf. Catalyst	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	ND	91	0	0	115
1,4-Dichlorobenzene	7.5	0.05	ND	ND	89	3	64	114
o-Cresol	200.0	0.05	ND	ND	91	4	110	116
m,p-Cresol	200.0	0.05	ND	ND	84	7	286	118
Hexachloroethane	3.0	0.05	ND	ND	86	4	92	110
Nitrobenzene	2.0	0.05	ND	ND	88	3	76	105
Hexachlorobutadiene	0.5	0.05	ND	ND	81	5	42	94
2,4,6-Trichlorophenol	2.0	0.05	ND	ND	88	2	85	112
2,4,5-Trichlorophenol	400.0	0.05	ND	ND	89	2	94	115
2,4-Dinitrotoluene	0.13	0.05	ND	ND	90	2	80	115
2,4-D	10.0	0.05	ND	ND	68	2	176	105
Hexachlorobenzene	0.13	0.05	ND	ND	89	4	94	112
2,4,5-TP	1.0	0.05	ND	ND	93	4	314	95
Pentachlorophenol	100.0	0.05	ND	ND	89	12	124	104

ND = Not Detected

*Surrogate recovery out of standard range for 2-Fluorobiphenyl due to matrix effect.

Surrogate	% RECOVERY	Surrogate	% RECOVERY
2-Fluorophenol	100	2-Fluorobiphenyl	124
Phenol-D6	70	2,4,6-Tribromophenol	57
Nitrobenzene-d5	110	Terphenyl-d14	122

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Semi	EPA 1311	12/3/97	EPA 8270	12/4/97	RP/HW	80 ea	100 ea

Director, Dr. Blair Leftwich

12-8-97
Date

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL REPORT

CLIENT NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

SAMPLE NO. : 7704419
INVOICE NO.: TE0255
REPORT DATE: 12-05-97
REVIEWED BY:
PAGE : 1 OF 1

CLIENT SAMPLE ID : DESULFURIZATION CATALYST
SAMPLE TYPE .....: CATALYST
SAMPLED BY .....: B. MADRID
SUBMITTED BY ....: B. MADRID
SAMPLE SOURCE ...: --

AUTHORIZED BY : B. MADRID
CLIENT P.O. : --
SAMPLE DATE ...: 11-24-97
SUBMITTAL DATE : 11-24-97
EXTRACTION DATE: --

TCLP Metals

D A T A T A B L E

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Arsenic (TCLP)	0.38	mg/L	0.050	12-01-97	SW846 7061	N. Munir
Barium (TCLP)	<5.0	mg/L	5.0	12-03-97	SW846 7080A	N. Munir
Cadmium (TCLP)	<0.25	mg/L	0.25	12-02-97	SW846 7130	N. Munir
Chromium (TCLP)	<0.50	mg/L	0.50	12-03-97	SW846 7190	N. Munir
Lead (TCLP)	<0.75	mg/L	0.75	12-03-97	SW846 7420	N. Munir
Mercury (TCLP)	<0.010	mg/L	0.010	12-01-97	SW846 7471A	N. Munir
Selenium (TCLP)	0.41	mg/L	0.050	12-02-97	SW846 7741A	N. Munir
Silver (TCLP)	<0.25	mg/L	0.25	12-01-97	SW846 7760A	N. Munir

Received Hobbs DEC 1998

(1) Copy to Client

ANALYTICAL RESULT(S) REPORTED HEREIN APPLY ONLY TO THE SAMPLE(S) TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY.

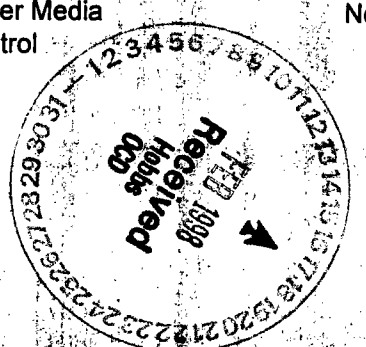
TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

December 08, 1997
Receiving Date: 11/24/97
Sample Type: Catalyst
Project No: NA
Project Location: NA

Extraction Date: 12/03/97
Analysis Date: 12/03/97
Sampling Date: 11/24/97
Sample Condition: I & C
Sample Received by: RP
Project Name: NA

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)
	EPA LIMIT =	---	500	250	---	<2 >12.5
T86397/7704413	Ceramic Support Media	Non-reactive	<10	<2.5	Non-corrosive	7.1
T86398/7704414	Sand Filter	Non-reactive	<10	<2.5	Non-corrosive	8.0
T86403/7704419	Desulfurization Catalyst	Non-reactive	<10	<2.5	Non-corrosive	5.2
T86404/7704420	Bauxite Dryer Media	Non-reactive	<10	<2.5	Non-corrosive	5.8
QC	Quality Control	---	---	---	---	7.0
RPD		0	0	9	0	0
% Extraction Accuracy		---	---	108	---	---
% Instrument Accuracy		---	---	106	---	100



METHODS: EPA SW 846-2.1.3, 2.1.2.
CHEMIST: JG

Director, Dr. Blair Leftwich

12-8-97
DATE

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL REPORT

Client NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

Invoice No. TE0255
Report Date 12-22-97
Reviewed by
Page 1 of 1

Parameter Flash Point
Test Method SW-1010
Authorized by B. MADRID
Client P.O.

LAB NO.	CLIENT SAMPLE ID	RESULT	UNIT	DETECTION LIMIT	SAMPLE DATE	ANALYSIS DATE
7704412	VACUUM TOWER SCALE	>180	degrees F	N/A	11-24-97	12-02-97
7704413	CERAMIC SUPPORT MEDIA	>180	degrees F	N/A	11-24-97	12-02-97
7704414	SAND FILTER	>180	degrees F	N/A	11-24-97	12-02-97
7704415	SEWER INSERTS	>180	degrees F	N/A	11-24-97	12-02-97
7704416	EXCHANGE SLUDGE	>180	degrees F	N/A	11-24-97	12-03-97
7704417	BLAST SAND	>180	degrees F	N/A	11-24-97	12-03-97
7704418	HYDROCARBON CONTAM. SOIL	>180	degrees F	N/A	11-24-97	12-03-97
7704419	DESULFURIZATION CATALYST	>180	degrees F	N/A	11-24-97	12-03-97
7704420	BAUXITE DRYER MEDIA	>180	degrees F	N/A	11-24-97	12-04-97
7704421	FLARE K.O. DRUM SCALE	112	degrees F	N/A	11-24-97	12-04-97
7704422	COKED TRAYS	>180	degrees F	N/A	11-24-97	12-04-97
7704423	DEPROPANIZER SCALE	>180	degrees F	N/A	11-24-97	12-04-97
7704424	COOLING TOWER SLUDGE	>180	degrees F	N/A	11-24-97	12-04-97

FEB 1998
Received
Hobbs
OCD

(1) Copy to Client

ANALYTICAL RESULTS REPORTED HEREIN APPLY ONLY TO THE SAMPLES TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY.

MANAGING DIRECTOR

TraceAnalysis, Inc.

6701 Aberdeen Avenue, Ste. 9 Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

LAB Order ID #

Company Name: NAVAJO REFINING Co.
Phone #:
Address:
Fax #:
Contact Person: BRYAN MADRID
Invoice to: (If different from above)
Project #:
Project Name:
Project Location:
Sampler Signature: Bryan Madrid

Received Hobbs OCD FEB 1998

ANALYSIS REQUEST
(Circle or Specify Method No.)

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	CATALYST	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME	MTBE 8020/602	BTEX 8020/602	TPH	PAH 8270	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	GC.MS Vol. 8240/8260/624	GC/MS Semi. Vol. 8270/625	PCB's 8080/608	Pest. 8080/608	BOD, TSS, PH					Turn Around Time if different from standard	Hold
	VACUUM TOWER SCALE	1	1L				X				X	X	11-24-97	8:00						X	X	X	X										
	CERAMIC SUPPORT MEDIA	1	1L					X			X	X	11-24-97	8:15						X	X	X	X										
	SAND FILTER	1	1L					X			X	X	11-24-97	9:30						X	X	X	X										
	SEWER INSERTS	1	1L				X				X	X	11-24-97	8:45						X	X	X	X										
	EXCHANGER SLUDGE	1	1L				X				X	X	11-24-97	9:00						X	X	X	X										
	BLAST SAND	1	1L		X						X	X	11-24-97	9:15						X	X	X	X										
	HYDROCARBON Contaminated Soil	1	1L		X						X	X	11-24-97	9:30						X	X	X	X										
	DESULFUCIZATION CATALYST	1	1L					X			X	X	11-24-97	9:45						X	X	X	X										
	BAUXITE DRYER MEDIA	1	1L					X			X	X	11-24-97	10:00						X	X	X	X										
	FLARE K.O. DRUM SCALE	1	1L				X				X	X	11-24-97	10:15						X	X	X	X										
	COKED TRAYS	1	1L								X	X	11-24-97	10:30						X	X	X	X										

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Bryan Madrid	11-24-97	12:00			
Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received at Laboratory by:	Date:	Time:
				11/24/97	12

LAB USE ONLY
Intact Y / N
Headspace Y / N
Temp °
Log-in Review

REMARKS:

Carrier #

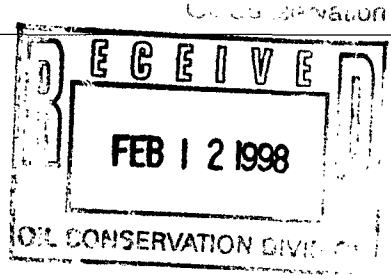
Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C.O.C.

CHART COPY

FEB 12 1998

Oil Conservation Division

Price, Wayne



From: Price, Wayne
Sent: Tuesday, February 10, 1998 3:18 PM
To: Martyne Kieling
Cc: Gum, Tim; Chris Williams
Subject: CRI/Navajo Artesia C-138

Martyne:

I am dropping in the mail today a large C-138 with 10 different waste streams.
I am sending Tim a copy as well. As you know Mr. Marsh has complained about the one's that are processed this way.

This way you will have an opportunity to be reviewing and if it gets lost between Hobbs-Artesia-Santa Fe we will not slow down the process. Also it looks like both my E-mail and Scan & file are having problems!

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
FEB 12 1998
Environmental Bureau
Oil Conservation Division

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Verbal Approval Received: Yes ☐ No ☐	4. Generator Navajo Refining 5. Originating Site Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Triad
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501E Main Artisia	new Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

Please see attached letter.

02-010

Volume = 85 yards, 15 - 55 gallon drums, and 15 super sacks

FEB 1998 Received Hobbs OCD

Sent 2/13/98

Estimated Volume _____ cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

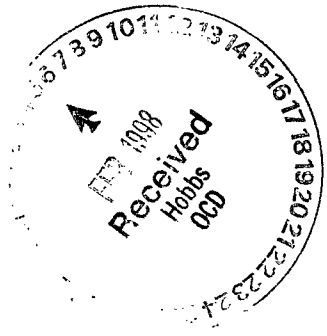
SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Office Manager DATE: 02/04/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR DATE: 2/10/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 2/12/98


Received
Hobbs
OCD

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811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
FEB 20 1998
Environmental Bureau
Oil Conservation Division

1998 FEB RECEIVED OCD ARTESIA

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

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BRIEF DESCRIPTION OF MATERIAL:

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FEB 1998 Received Hobbs OCD

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SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Office Manager DATE: 02/04/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR 2/16 DATE: 2

APPROVED BY: _____ TITLE: _____ DATE: _____

TELEPHONE
(505) 748-3311

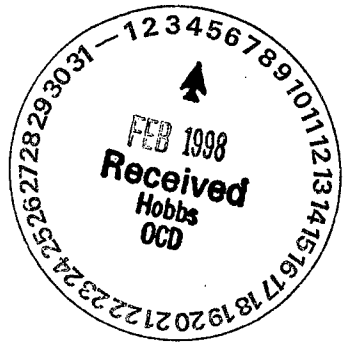
EASYLINK
62905278

REFINING COMPANY

501 EAST MAIN STREET • P. O. BOX 159
ARTESIA, NEW MEXICO 88211-0159

FAX
(505) 746-6410 ACCTG
(505) 746-6155 EXEC
(505) 748-9077 ENGR
(505) 746-4438 P / L

February 2, 1998



Ken Marsh
CRI Inc.
P.O. Box 369
Hobbs, NM 88241

Dear Mr. Marsh:

During the past few months, some wastes have been accumulated here at Navajo in Artesia. Below you will find a brief description and the amount of non-hazardous material generated. I would like to get these wastes profiled in as soon as possible so I can begin shipping them to your facility.

Polymer is a chemical used to combine small particles in wastewater. These larger particles are then injected with air to produce a float. The polymer is stored in a vat before it is mixed with wastewater. If it is not stirred constantly, it will separate, harden, and become useless. The mixer for the polymer recently broke and consequently the above occurred. The vat was cleaned out with the polymer placed into two fifty-five gallon drums. Before shipment, these drums will be put in a 20 yard roll off bin.

Slurry from our FCCU is sent to the slingers in order to separate heavy slurry and cat fines from crude black oil. The slurry, cat fine mixture is then sent to the slurry pits where it is then transported to railcars. Over time, cat fines and dirt will form a sludge on the bottom of the pits that can no longer be used or recycled. These pits were cleaned out with approximately 10 yards of sludge placed into a 20 yard roll off bin.

In our naphtha hydrotreater, isom feed from the naphtha splitter is sent to the isom feed sulfur guard drums (D-41 and D-42). These drums are filled with a catalyst known as sulfur guard which absorbs any sulfur that may be present in the feed. Desulfurized feed is then sent to charge our isom unit. A change out of this sulfur guard resulted in an accumulation of approximately 20 yards of catalyst. Before shipment, this catalyst will be transferred in to a 20 yard roll off bin.

In our alkylation unit, olefin feed is dried by running it through our olefin feed dryers (D-642 and D-643). These dryers are filled with desiccant that absorbs any water that may be in the feed before it is sent to the acid settler (D-620) for product separation. Before the feed is sent to the settler, it is combined with isobutane. D-620 is filled with hydrofluoric acid which is used as a catalyst for the separation of feed and isobutane into an alkylate, propane, butane mixture. When the alkylation unit was shut down, D-642 and D-643 were filled with new desiccant. The old desiccant which amounted to 40 yards, was place into two 20 yard roll off bins. D-620 was also cleaned out and sand blasted. The contaminated blast sand was put into three 55 gallon drums and will be transferred to a 20 yard roll off bin before shipment.

In our north utility unit, condensate is sent through polishers D-74 and D-75. These drums are filled with a substance called zeolite that aids in softening the condensate. Steam is generated in boilers and used throughout the plant. Condensate from the steam is sent through a condensate line to the polishers where it is softened and sent back to the boilers to complete the circle. Softening is required to limit the scaling up

1998
Received
Hobbs
OCD

of steam lines in the refinery. The zeolite in the polishers was changed out and placed in six 55 gallon drums. These drums will be transferred to a 20 yard roll off bin before shipment.

In our sats gas plant, propane is sent through the propane scrubber (D-334) to remove water. It is also used to remove any H2S that may be in propane due to a unit upset. The water is drained off to the sour water stripper while the propane is sent on for further treatment. The catalyst in this drum was changed out and put into five 55 gallon drums. Before shipment, they will be transferred into a 20 yard roll off bin.

A sample of each of the above wastes was taken and sent to Trace Analysis Incorporated. Enclosed you will find all analyses along with a Certificate of Waste Status for each media. Since TCLP analyses show each waste to be non-hazardous, we would like to send them to your facility.

FCC cat fines are generated on a daily basis. Since fines have been approved in the past, I would like to send the 15 super sacks we have to your facility. I have enclosed a Certificate of Waste Status and the most recent C-138.

A recent change out of chloride guard at our CCR Unit produced approximately 10 yards of media. This has also been approved in the past and since process has not changed, I would also like to ship this waste. I have enclosed a Certificate of Waste Status along with the most recent C-138.

Since asphalt has been approved before, I would like to sent the 5 yards we have to your facility. As before, a Certificate of Waste Status and a C-138 are enclosed.

If approved, each waste will be shipped by Triad Trucking in 20 yard roll off bins.

If you have any questions, I can be reached at (505) 748-3311. Thank you for your time in this matter.

Sincerely,

Bryan Madrid

Bryan Madrid
Environmental Specialist

Encl.

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

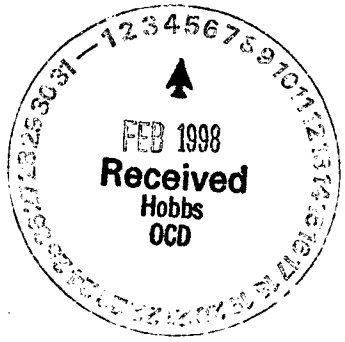
Originating Location: NAVAJO REFINING CO.

Sources: PETROLEUM REFINING – POLYMER ✓

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING CO. concur with the status of the waste from the subject site.



Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 1/22/98

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO.

Sources: PETROLEUM REFINING - SLINGER SLUDGE ✓

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

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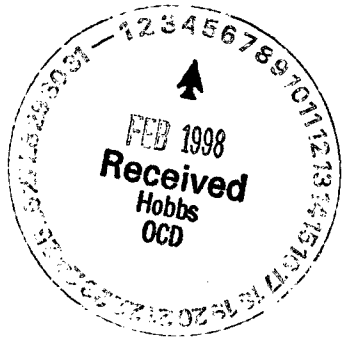

Name BRYAN MADRID

Title/Agency ENV. SPEC

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 1/22/98

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO. ✓

Sources: PETROLEUM REFINING - SULFUR GUARD ✓

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING CO. concur with the status of the waste from the subject site.

Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 1/22/98

FEB 1998
Received
Hobbs
OCD

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO. ✓

Sources: PETROLEUM REFINING - DESICCANT

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

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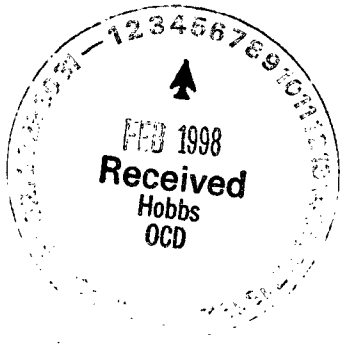

Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 1/22/98

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO.

Sources: PETROLEUM REFINING - BLAST SAND V

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

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Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 1/22/98

FEB 1998
Received
Hobbs
OCD

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO.

Sources: PETROLEUM REFINING - ZEOLITE ✓

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING CO. concur with the status of the waste from the subject site.

Name BRYAN MADRID

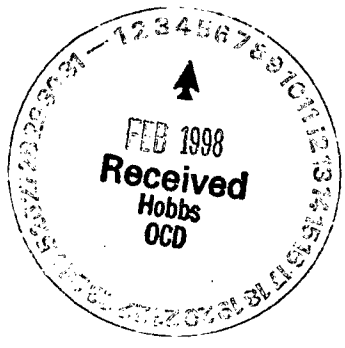
Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 1/22/98



CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO.

Sources: PETROLEUM REFINING - PROPANE SCRUBBER CATALYST ✓

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING CO. concur with the status of the waste from the subject site.

Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 1/22/98

FEB 1998
Received
Hobbs
OCD

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO.

Sources: PETROLEUM REFINING - FCC CAT FINES ✓

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING CO. concur with the status of the waste from the subject site.

Name BRYAN MADRID

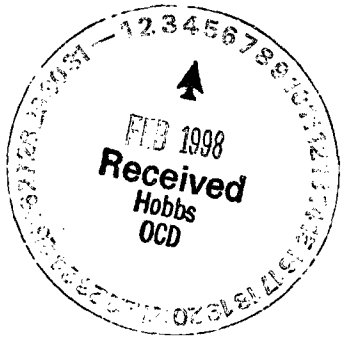
Title/Agency ENV. SPEC

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 2/2/98



CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO.

Sources: PETROLEUM REFINING - CHLORIDE GUARD ✓

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING CO. concur with the status of the waste from the subject site.

Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 2/2/98

FEB 1998
Received
Hobbs
OCD

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO.

Sources: PETROLEUM REFINING - ASPHALT

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING CO. concur with the status of the waste from the subject site.

Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 2/2/98

FEB 1998
Received
Hobbs
OCD

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

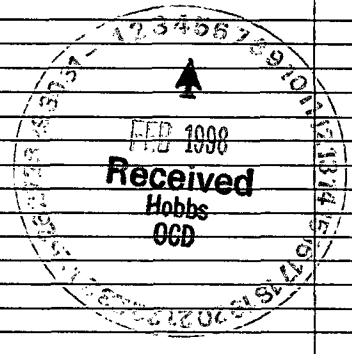
ANALYTICAL REPORT

Client **NAVAJO REFINING COMPANY**
501 E MAIN
ARTESIA NM 88210

Invoice No. **TE0296**
Report Date **01-05-98**
Reviewed by
Page **1** of **1**

Parameter **Flash Point**
Test Method **SW-1010**
Authorized by **BRYAN MADRID**
Client P.O.

LAB NO.	CLIENT SAMPLE ID	RESULT	UNIT	DETECTION LIMIT	SAMPLE DATE	ANALYSIS DATE
7704552	Zeolite	>180	degrees F	N/A	12-08-97	12-10-97
7704553	Polymer	>180	degrees F	N/A	12-08-97	12-10-97
7704554	Gaskets	>180	degrees F	N/A	12-08-97	12-10-97
7704555	Blast Sand	>180	degrees F	N/A	12-08-97	12-11-97
7704556	Skid E	82	degrees F	N/A	12-08-97	12-12-97
7704557	D-260 HF	113	degrees F	N/A	12-08-97	12-12-97



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ANALYTICAL RESULTS REPORTED HEREIN APPLY ONLY TO THE SAMPLES TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY.

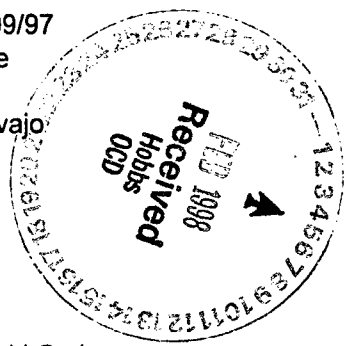
TRACEANALYSIS, INC.
A Laboratory for Advanced Environmental Research and Analysis

MANAGING DIRECTOR

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

December 18, 1997
Receiving Date: 12/09/97
Sample Type: Sludge
Project No: NA
Project Location: Navajo



Extraction Date: 12/04/97
Analysis Date: 12/04/97
Sampling Date: 12/08/97
Sample Condition: I & C
Sample Received by: BW
Project Name: NA

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)
	EPA LIMIT =	---	500	250	---	<2 >12.5
T87007/7704552	Zeolite	Non-reactive	<10	<2.5	Non-corrosive	8.0
T87008/7704553	Polymer	Non-reactive	<10	<2.5	Non-corrosive	5.6
T87011/7704556	Skid E	Non-reactive	<10	<2.5	Non-corrosive	10.7
T87012/7704557	D-620 HF	Non-reactive	<10	<2.5	Non-corrosive	4.0
QC	Quality Control	---	---	---	---	7.0
RPD		0	0	9	0	0
% Extraction Accuracy		---	---	108	---	---
% Instrument Accuracy		---	---	106	---	100

METHODS: EPA SW 846-2.1.3, 2.1.2.
CHEMIST: JG

Director, Dr. Blair Leftwich

12-18-97
DATE

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

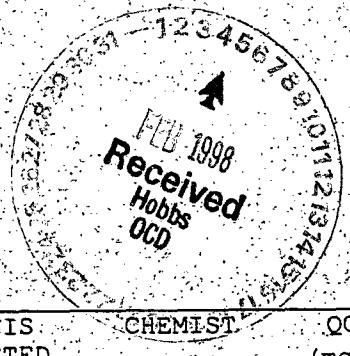
ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Dec 19, 1997
Date Rec: 12/9/97
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9712000185
Sampling Date: 12/8/97
Sample Condition: Intact and Cool
Sample Received By: NG

TCLP Vol in Sludge (mg/L)	EPA Limit	Reporting Limit	Method Blank	T87007 Zeolite ✓	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	113	7	98	113
1,1-Dichloroethene	0.7	0.05	ND	ND	111	1	89	111
Methyl Ethyl Ketone	200.0	0.50	ND	ND	111	0	109	111
Chloroform	6.0	0.05	ND	ND	110	1	108	110
1,2-Dichloroethane	0.5	0.05	ND	ND	109	0	110	109
Benzene	0.5	0.05	ND	ND	105	2	103	105
Carbon Tetrachloride	0.5	0.05	ND	ND	113	2	109	113
Trichloroethene	0.5	0.05	ND	ND	100	3	107	100
Tetrachloroethane	0.7	0.05	ND	ND	95	4	108	95
Chlorobenzene	100.0	0.05	ND	ND	101	2	96	101
1,4-Dichlorobenzene	7.5	0.05	ND	ND	101	0	100	101

	% RECOVERY
Dibromofluoromethane	102
Toluene-d8	103
4-Bromofluorobenzene	99



TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	12/14/97	EPA 8260	12/15/97	RW	100 ea	100 ea

Director, Dr. Blair Leftwich

12-19-97
Date

TRACE ANALYSIS, INC.

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4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

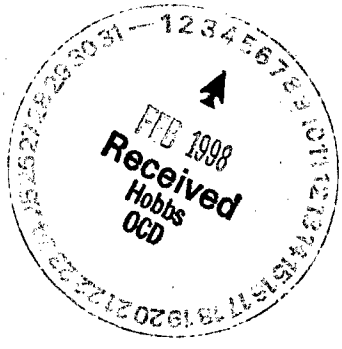
December 18, 1997
Receiving Date: 12/09/97
Sample Type: Sludge
Project No: NA
Project Location: Navajo

Extraction Date: 12/10/97
Analysis Date: 12/16/97
Sampling Date: 12/08/97
Sample Condition: Intact & Cool
Sample Received by: BW
Project Name: NA

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	Method Blank	T87007/7704552 Zeolite ✓	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	ND	78	18	12	98
1,4-Dichlorobenzene	7.5	0.05	ND	ND	77	0	20	96
o-Cresol	200.0	0.05	ND	ND	67	4	28	84
m,p-Cresol	200.0	0.05	ND	ND	66	4	53	82
Hexachloroethane	3.0	0.05	ND	ND	74	4	23	92
Nitrobenzene	2.0	0.05	ND	ND	74	6	35	92
Hexachlorobutadiene	0.5	0.05	ND	ND	80	4	26	100
2,4,6-Trichlorophenol	2.0	0.05	ND	ND	79	3	33	99
2,4,5-Trichlorophenol	400.0	0.05	ND	ND	81	3	33	101
2,4-Dinitrotoluene	0.13	0.05	ND	ND	80	3	37	100
2,4-D	10.0	0.05	ND	ND	86	2	128	108
Hexachlorobenzene	0.13	0.05	ND	ND	80	4	56	100
2,4,5-TP	1.0	0.05	ND	ND	80	4	268	100
Pentachlorophenol	100.0	0.05	ND	ND	93	10	50	116

Surrogates	**% RECOVERY**
2-Fluorophenol	22
Phenol-d6	16
Nitrobenzene-d5	46
2-Fluorobiphenyl	41
2,4,6-Tribromophenol	62
Terphenyl-d14	77

ND - Not Detected



Methods: EPA SW 846-1311, 8270.
CHEMIST: RP/HW

Director, Dr. Blair Leftwich

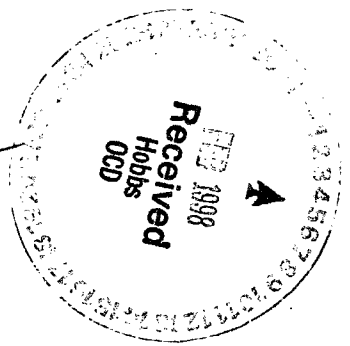
12-18-97
DATE

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL REPORT

CLIENT NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

SAMPLE NO. : 7704552
INVOICE NO.: TE0296
REPORT DATE: 12-16-97
REVIEWED BY:
PAGE : 1 OF 1



CLIENT SAMPLE ID : Zeolite
SAMPLE TYPE .....: Solid
SAMPLED BY .....: R. Madrid
SUBMITTED BY ....: B. Madrid
SAMPLE SOURCE ...: Navajo

AUTHORIZED BY : B. Madrid
CLIENT P.O. : --
SAMPLE DATE ...: 12-08-97
SUBMITTAL DATE : 12-09-97
EXTRACTION DATE: --

TCLP Metals

D A T A T A B L E

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Arsenic (TCLP) .....:	<0.050	mg/L	0.050	12-10-97	SW846 7061	N. Munir
Barium (TCLP) .....:	<5.0	mg/L	5.0	12-12-97	SW846 7080A	N. Munir
Cadmium (TCLP) .....:	0.25	mg/L	0.25	12-12-97	SW846 7130	N. Munir
Chromium (TCLP) .....:	<0.50	mg/L	0.50	12-12-97	SW846 7190	N. Munir
Lead (TCLP) .....:	<0.75	mg/L	0.75	12-12-97	SW846 7420	N. Munir
Mercury (TCLP) .....:	<0.010	mg/L	0.010	12-16-97	SW846 7471A	N. Munir
Selenium (TCLP) .....:	<0.050	mg/L	0.050	12-10-97	SW846 7741A	N. Munir
Silver (TCLP) .....:	<0.25	mg/L	0.25	12-16-97	SW846 7760A	N. Munir

ANALYTICAL RESULT(S) REPORTED HEREIN APPLY ONLY TO THE SAMPLE(S) TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY.

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MANAGING DIRECTOR

TRACE ANALYSIS, INC.

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4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

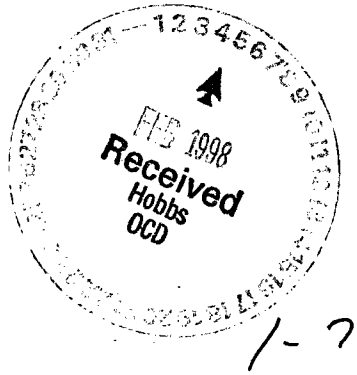
January 07, 1998
Receiving Date: 12/09/97
Sample Type: Sludge
Project No: NA
Project Location: Navajo

Extraction Date: 01/05/98
Analysis Date: 01/06/98
Sampling Date: 12/08/97
Sample Condition: Intact & Cool
Sample Received by: BW
Project Name: NA

TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T87008/7704553 Polymer ✓	QC	RPD	%EA	%IA
Vinyl chloride	0.20	0.001	ND	82	6	91	82
1,1-Dichloroethene	0.70	0.001	ND	95	1	91	95
Methyl Ethyl Ketone	200.0	0.010	ND	85	1	94	85
Chloroform	6.00	0.001	ND	92	1	93	92
1,2-Dichloroethane	0.50	0.001	ND	99	2	91	99
Benzene	0.50	0.001	ND	97	1	97	97
Carbon Tetrachloride	0.50	0.001	ND	115	1	113	115
Trichloroethene	0.50	0.001	ND	96	2	98	96
Tetrachloroethene	0.70	0.001	ND	100	2	105	100
Chlorobenzene	100.00	0.001	ND	101	2	100	101
1,4-Dichlorobenzene	7.50	0.001	ND	106	2	101	106

SURROGATES	**% Recovery**
Dibromofluoromethane	87
Toluene-d8	92
4-Bromofluorobenzene	94

ND = Not Detected



METHODS: EPA SW 846-1311, 8260.
CHEMIST: RW

Director, Dr. Blair Leftwich

1-7-98
DATE

TRACE ANALYSIS, INC.

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4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

December 18, 1997
Receiving Date: 12/09/97
Sample Type: Sludge
Project No: NA
Project Location: Navajo

Extraction Date: 12/10/97
Analysis Date: 12/15/97
Sampling Date: 12/08/97
Sample Condition: Intact & Cool
Sample Received by: BW
Project Name: NA

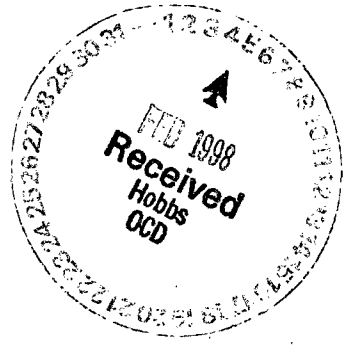
TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit*	Method Blank	T87008/7704553 Polymer ✓	QC	RPD	%EA	%IA
Pyridine	5.0	2.0	ND	ND	78	18	12	98
1,4-Dichlorobenzene	7.5	2.0	ND	ND	77	0	20	96
o-Cresol	200.0	2.0	ND	ND	67	4	28	84
m,p-Cresol	200.0	2.0	ND	ND	66	4	53	82
Hexachloroethane	3.0	2.0	ND	ND	74	4	23	92
Nitrobenzene	2.0	2.0	ND	ND	74	6	35	92
Hexachlorobutadiene	0.5	2.0	ND	ND	80	4	26	100
2,4,6-Trichlorophenol	2.0	2.0	ND	ND	79	3	33	99
2,4,5-Trichlorophenol	400.0	2.0	ND	ND	81	3	33	101
2,4-Dinitrotoluene	0.13	2.0	ND	ND	80	3	37	100
2,4-D	10.0	2.0	ND	ND	86	2	128	108
Hexachlorobenzene	0.13	2.0	ND	ND	80	4	56	100
2,4,5-TP	1.0	2.0	ND	ND	80	4	268	100
Pentachlorophenol	100.0	2.0	ND	ND	93	10	50	116

Surrogates	**% RECOVERY**
2-Fluorophenol	6**
Phenol-d6	17
Nitrobenzene-d5	262**
2-Fluorobiphenyl	305**
2,4,6-Tribromophenol	0**
Terphenyl-d14	297**

ND - Not Detected

***NOTE: Elevated reporting limit due to matrix effect.**
****NOTE: Surrogate recovery out of standard range due to matrix effect.**

Methods: EPA SW 846-1311, 8270.
CHEMIST: RP/HW



Director, Dr. Blair Leftwich

12-18-97
DATE

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL REPORT

CLIENT NAVAJO REFINING COMPANY
501 E MAIN/PO BOX 159
ARTESIA, NM 88211

SAMPLE NO. : 7704553
INVOICE NO.: TE0296
REPORT DATE: 12-18-97
REVIEWED BY:
PAGE : 1 OF 1

Received FEB 1998 Hobbs OCD

CLIENT SAMPLE ID : Polymer
SAMPLE TYPE .....: Sludge
SAMPLED BY .....: R. Madrid
SUBMITTED BY ....: B. Madrid
SAMPLE SOURCE ...: Navajo

AUTHORIZED BY : B. Madrid
CLIENT P.O. : --
SAMPLE DATE ...: 12-08-97
SUBMITTAL DATE : 12-09-97
EXTRACTION DATE: --

TCLP Metals

D A T A T A B L E

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Arsenic (TCLP)	<0.050	mg/L	0.050	12-16-97	SW846 7061	N. Munir
Barium (TCLP)	<5.0	mg/L	5.0	12-17-97	SW846 7080A	N. Munir
Cadmium (TCLP)	<0.25	mg/L	0.25	12-17-97	SW846 7130	N. Munir
Chromium (TCLP)	<0.50	mg/L	0.50	12-17-97	SW846 7190	N. Munir
Lead (TCLP)	<0.75	mg/L	0.75	12-17-97	SW846 7420	N. Munir
Mercury (TCLP)	<0.010	mg/L	0.010	12-16-97	SW846 7471A	N. Munir
Selenium (TCLP)	<0.050	mg/L	0.050	12-16-97	SW846 7741A	N. Munir
Silver (TCLP)	<0.25	mg/L	0.25	12-16-97	SW846 7760A	N. Munir

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MANAGING DIRECTOR

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Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

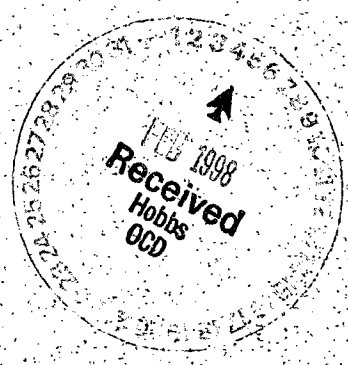
ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Dec 19, 1997
Date Rec: 12/9/97
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9712000185
Sampling Date: 12/8/97
Sample Condition: Intact and Cool
Sample Received By: NG

TCLP Vol in Soil (mg/L)	EPA Limit	Reporting Limit	Method Blank	T87010 Blast Sand	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	113	7	98	113
1,1-Dichloroethene	0.7	0.05	ND	ND	111	1	89	111
Methyl Ethyl Ketone	200.0	0.50	ND	ND	111	0	109	111
Chloroform	6.0	0.05	ND	ND	110	1	108	110
1,2-Dichloroethane	0.5	0.05	ND	ND	109	0	110	109
Benzene	0.5	0.05	ND	ND	105	2	103	105
Carbon Tetrachloride	0.5	0.05	ND	ND	113	2	109	113
Trichloroethene	0.5	0.05	ND	ND	100	3	107	100
Tetrachloroethane	0.7	0.05	ND	ND	95	4	108	95
Chlorobenzene	100.0	0.05	ND	ND	101	2	96	101
1,4-Dichlorobenzene	7.5	0.05	ND	ND	101	0	100	101

	% RECOVERY
Dibromofluoromethane	102
Toluene-d8	103
4-Bromofluorobenzene	100



TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	12/14/97	EPA 8260	12/15/97	RW	100 ea	100 ea

Director, Dr. Blair Leftwich

12-19-97
Date

TRACE ANALYSIS, INC.
An Institute for Advanced Environmental Research and Analysis

TRACE ANALYSIS, INC.

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4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

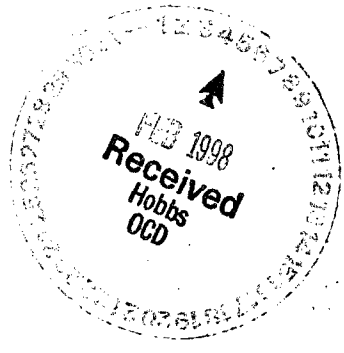
December 18, 1997
Receiving Date: 12/09/97
Sample Type: Soil
Project No: NA
Project Location: Navajo

Extraction Date: 12/10/97
Analysis Date: 12/16/97
Sampling Date: 12/08/97
Sample Condition: Intact & Cool
Sample Received by: BW
Project Name: NA

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	Method Blank	T87010/7704555 Blast Sand	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	ND	78	18	12	98
1,4-Dichlorobenzene	7.5	0.05	ND	ND	77	0	20	96
o-Cresol	200.0	0.05	ND	ND	67	4	28	84
m,p-Cresol	200.0	0.05	ND	ND	66	4	53	82
Hexachloroethane	3.0	0.05	ND	ND	74	4	23	92
Nitrobenzene	2.0	0.05	ND	ND	74	6	35	92
Hexachlorobutadiene	0.5	0.05	ND	ND	80	4	26	100
2,4,6-Trichlorophenol	2.0	0.05	ND	ND	79	3	33	99
2,4,5-Trichlorophenol	400.0	0.05	ND	ND	81	3	33	101
2,4-Dinitrotoluene	0.13	0.05	ND	ND	80	3	37	100
2,4-D	10.0	0.05	ND	ND	86	2	128	108
Hexachlorobenzene	0.13	0.05	ND	ND	80	4	56	100
2,4,5-TP	1.0	0.05	ND	ND	80	4	268	100
Pentachlorophenol	100.0	0.05	ND	ND	93	10	50	116

Surrogates	**% RECOVERY**
2-Fluorophenol	28
Phenol-d6	20
Nitrobenzene-d5	52
2-Fluorobiphenyl	50
2,4,6-Tribromophenol	48
Terphenyl-d14	58

ND - Not Detected



Methods: EPA SW 846-1311, 8270.
CHEMIST: RP/HW

Director, Dr. Blair Leftwich

12-18-97
DATE

TRACE ANALYSIS, INC.
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ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

December 18, 1997
Receiving Date: 12/09/97
Sample Type: Soil
Project No: NA
Project Location: Navajo

Extraction Date: 12/04/97
Analysis Date: 12/04/97
Sampling Date: 12/08/97
Sample Condition: I & C
Sample Received by: BW
Project Name: NA

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)
	EPA LIMIT =	---	500	250	---	<2 >12.5
T87010/7704555	Blast Sand ✓	Non-reactive	<10	<2.5	Non-corrosive	5.1
QC	Quality Control	---	---	---	---	7.0
RPD		0	0	9	0	0
% Extraction Accuracy		---	---	108	---	---
% Instrument Accuracy		---	---	106	---	100

Received
Hobbs
OCD
DEC 1998

METHODS: EPA SW 846-2.1.3, 2.1.2
CHEMIST: JG

Director, Dr. Blair Leftwich

12-18-97
DATE

TraceAnalysis, Inc.

6701 Aberdeen Avenue, Ste. 9 Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

LAB Order ID #

Company Name: NAVAJO REFINING CO. Phone #:

Address: 501 E. MAIN Fax #:

Contact Person: BRYAN MADRID

Invoice to: (If different from above)

Project #: Project Name:

Project Location: NAVAJO Sampler Signature: Bryan Madrid

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME
770552	ZEOLITE	1	1L							X	X	12/8/97	8:00
4553	POLYMER	1	1L				X			X	X	12/8/97	8:15
4554	* GASKETS	1	1L							X	X	12/8/97	8:30
4555	BLAST SAND	1	1L		X					X	X	12/8/97	8:45
4556	*** SKID E	1	1L				X			X	X	12/8/97	9:00
4557	*** D-620 HF	1	1L				X			X	X	12/8/97	9:15

ANALYSIS REQUEST (Circle or Specify Method No.)

MTBE 8020/602	BTEX 8020/602	TPH	PAH 8270	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	GC.MS Vol. 8240/8260/624	GC/MS Semi. Vol. 8270/625	PCB's 8080/608	Pest. 8080/608	BOD, TSS, PH				Turn Around Time if different from standard	Hold
					X	X	X	X										
					X	X	X	X										
					X	X	X	X										
					X	X	X	X										
					X	X	X	X										
					X	X	X	X										

Received DEC 1997 Hobbs OCD

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Bryan Madrid	12-8-97	16:15			
Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received at Laboratory by:	Date:	Time:
				12/9/97	11:00

LAB USE ONLY
Intact Y / N
Headspace Y / N
Temp °
Log-In Review

REMARKS: * CAME FROM ALKY UNIT, SO MAY HAVE TRACES OF ACID EVEN THOUGH THEY WERE NEUTRALIZED.
** RESIDUE FROM HF ACID DRUM. MAY BE HOT
*** MAY BE CAUSTIC

Carrier #

Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C.O.C.

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TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

January 12, 1998
Receiving Date: 01/03/98
Sample Type: Solid
Project No: NA
Project Location: NA

Extraction Date: 01/08/98
Analysis Date: 01/08/98
Sampling Date: 01/02/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	IGNITABILTY
	EPA LIMIT =	---	500	250	---	<2 >12.5	---
T88309	Insulation Paper	Non-reactive	<10	<2.5	Non-corrosive	6.9	Nonignitable
T88310	D-334 Catalyst	Non-reactive	<10	2.5	Non-corrosive	10.8	Nonignitable
T88311	Grease	Non-reactive	<10	<2.5	Non-corrosive	8.7	Nonignitable
T88312	D-626	Non-reactive	<10	<2.5	Non-corrosive	5.3	Nonignitable
T88313	D-642	Non-reactive	<10	<2.5	Non-corrosive	6.0	Nonignitable
QC	Quality Control	---	---	---	---	7.0	---
RPD		0	0	0	0	0	0
% Extraction Accuracy		---	---	---	---	---	---
% Instrument Accuracy		---	---	---	---	100	---

METHODS: EPA SW 846-2.1.3, 2.1.2, 2.1.1.
CHEMIST: JG

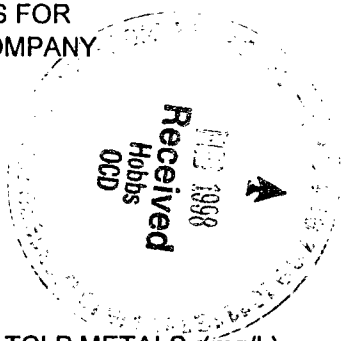
Received
Hobbs
OCD
FEB 1998

Director, Dr. Blair Leftwich

1-12-98
DATE

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210



January 16, 1998
Receiving Date: 01/03/98
Sample Type: Solid
Project No: NA
Project Location: NA

Extraction Date: 01/05/98
Analysis Date: 01/06/98
Sampling Date: 01/02/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cr	Cd	Pb	Ag	Ba	Hg
	EPA LIMIT =	5.0	1.0	5.0	1.0	5.0	5.0	100.0	0.20
T88309	Insulation Paper	<0.10	<0.10	<0.05	<0.02	71	0.10	0.46	<0.01
T88310	D-334 Catalyst	<0.10	<0.10	<0.05	<0.02	0.45	<0.05	1.1	<0.01
T88311	Grease	<0.10	<0.10	<0.05	<0.02	0.15	<0.05	0.90	<0.01
T88312	D-626	28	<0.10	<0.05	<0.02	0.52	0.09	0.13	<0.01
T88313	D-642	0.64	<0.10	<0.05	<0.02	0.10	<0.05	0.89	<0.01
QC	Quality Control	5.0	5.0	5.1	4.9	4.9	1.1	5.0	0.050
Reporting Limit		0.10	0.10	0.05	0.02	0.10	0.05	0.10	0.01
RPD		5	5	5	0	0	7	5	2
% Extraction Accuracy		103	98	103	100	90	93	103	101
% Instrument Accuracy		99	100	102	97	98	105	99	104

CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba: HC Hg: HC
METHODS: EPA SW 846-1311, 6010B, 7470.
TCLP METALS SPIKE: 20 mg/L As, Se, Cd, Cr, Pb, Ba; 1.5 mg/L Ag; 0.05 mg/L Hg.
TCLP METALS QC: 5.0 mg/L As, Se, Cd, Cr, Pb, Ba; 1.0 mg/L Ag; 0.05 mg/L Hg.

Director, Dr. Blair Leftwich

1-16-98
Date

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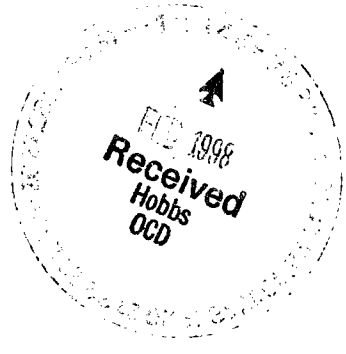
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Jan 08, 1998
Date Rec: 1/3/98
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9801000015
Sampling Date: 1/2/98
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Vol in Solid (mg/L)	EPA Limit	Reporting Limit	Method Blank	T88313 D-642	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	82	6	86	82
1,1-Dichloroethene	0.7	0.05	ND	ND	95	1	91	95
Methyl Ethyl Ketone	200.0	0.50	ND	ND	85	1	92	85
Chloroform	6.0	0.05	ND	ND	92	1	95	92
1,2-Dichloroethane	0.5	0.05	ND	ND	99	2	92	99
Benzene	0.5	0.05	ND	ND	97	1	98	97
Carbon Tetrachloride	0.5	0.05	ND	ND	115	1	112	115
Trichloroethene	0.5	0.05	ND	ND	96	2	100	96
Tetrachloroethane	0.7	0.05	ND	ND	100	2	108	100
Chlorobenzene	100.0	0.05	ND	ND	101	2	102	101
1,4-Dichlorobenzene	7.5	0.05	ND	ND	106	2	104	106



	% RECOVERY
Dibromofluoromethane	90
Toluene-d8	93
4-Bromofluorobenzene	95

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	1/5/98	EPA 8260	1/6/98	RW	100 ea	100 ea

Director, Dr. Blair Leftwich

1-8-98
Date

TRACE ANALYSIS, INC.

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E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

January 16, 1998
Receiving Date: 01/03/98
Sample Type: Solid
Project No: NA
Project Location: NA

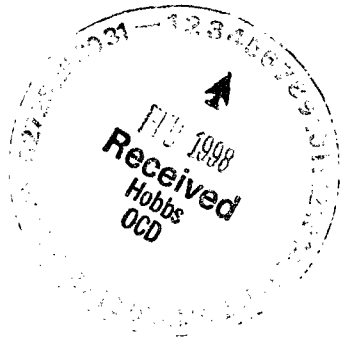
Extraction Date: 01/05/98
Analysis Date: 01/12/98
Sampling Date: 01/02/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit*	T88313 D-642	QC	RPD	%EA	%IA
Pyridine	5.0	0.5	ND	68	12	5	85
1,4-Dichlorobenzene	7.5	0.5	ND	82	2	45	102
o-Cresol	200.0	0.5	ND	81	2	55	101
m,p-Cresol	200.0	0.5	0.59	83	3	50	104
Hexachloroethane	3.0	0.5	ND	72	0	40	90
Nitrobenzene	2.0	0.5	ND	76	2	60	95
Hexachlorobutadiene	0.5	0.5	ND	72	4	43	90
2,4,6-Trichlorophenol	2.0	0.5	ND	76	4	48	95
2,4,5-Trichlorophenol	400.0	0.5	ND	78	2	50	98
2,4-Dinitrotoluene	0.13	0.5	ND	76	8	61	95
2,4-D	10.0	0.5	ND	76	12	377	95
Hexachlorobenzene	0.13	0.5	ND	80	9	70	100
2,4,5-TP	1.0	0.5	ND	70	10	224	88
Pentachlorophenol	100.0	0.5	ND	88	22*	53	110

***NOTE: Elevated reporting limits due to matrix effect.**
****NOTE: RPD out of standard range.**

Surrogates	**% RECOVERY**
2-Fluorophenol	42
Phenol-d6	40
Nitrobenzene-d5	92
2-Fluorobiphenyl	95
2,4,6-Tribromophenol	81
Terphenyl-d14	100

Methods: EPA SW 846-1311, 8270.
CHEMIST: RP/HW
ND - Not Detected



BL

Director, Dr. Blair Leftwich

1-16-98

DATE

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E-Mail: lab@traceanalysis.com

ANALYTICAL REPORT

CLIENT Navajo Refining Co.
501 E. Main
Artesia, NM 88211

SAMPLE NO. : 88313
INVOICE NO.: 22101465
REPORT DATE: 01-21-98
REVIEWED BY:
PAGE : 1 OF 2

CLIENT SAMPLE ID : D-642
SAMPLE TYPE .....: Solid
SAMPLED BY .....: B. Madrid
SUBMITTED BY ....: B. Madrid
SAMPLE SOURCE ...: --
ANALYST .....: K. Costa

AUTHORIZED BY : B. Madrid
CLIENT P.O. : --
SAMPLE DATE ...: 01-02-98
SUBMITTAL DATE : 01-08-98
EXTRACTION DATE: 01-14-98
ANALYSIS DATE .: 01-14-98

TCLP Pesticides by EPA 8081A

D A T A T A B L E

Parameter	Result	Unit	Detection Limit
Chlordane	<0.03	mg/L	0.03
Endrin	<0.02	mg/L	0.02
Heptachlor	<0.008	mg/L	0.008
Lindane	<0.4	mg/L	0.4
Methoxychlor	<10.	mg/L	10.
Heptachlor epoxide	<0.008	mg/L	0.008
Toxaphene	<0.5	mg/L	0.5

JAN 1998 Received Hobbs OCD

(1) Copy to Client

ANALYTICAL RESULT(S) REPORTED HEREIN APPLY ONLY TO THE SAMPLE(S) TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY.

MANAGING DIRECTOR

TRACE ANALYSIS, INC.

ANALYTICAL REPORT

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4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

CLIENT Navajo Refining Co.
501 E. Main
Artesia, NM 88211

SAMPLE NO. : 88313
INVOICE NO.: 22101465
REPORT DATE: 01-21-98
REVIEWED BY:

D A T A T A B L E (Cont.)

Surrogate Information -

	Percent Recovery	Range
Tetrachloro-m-Xylene .....:	72.1	39-119
Decachlorobiphenyl .....:	73.2	41-120

(1) Copy to Client

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E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Jan 08, 1998
Date Rec: 1/3/98
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9801000015
Sampling Date: 1/2/98
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Vol in Solid (mg/L)	EPA Limit	Reporting Limit	Method Blank	T88310 D-334 Catalyst ✓	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	82	6	86	82
1,1-Dichloroethene	0.7	0.05	ND	ND	95	1	91	95
Methyl Ethyl Ketone	200.0	0.50	ND	ND	85	1	92	85
Chloroform	6.0	0.05	ND	ND	92	1	95	92
1,2-Dichloroethane	0.5	0.05	ND	ND	99	2	92	99
Benzene	0.5	0.05	ND	ND	97	1	98	97
Carbon Tetrachloride	0.5	0.05	ND	ND	115	1	112	115
Trichloroethene	0.5	0.05	ND	ND	96	2	100	96
Tetrachloroethane	0.7	0.05	ND	ND	100	2	108	100
Chlorobenzene	100.0	0.05	ND	ND	101	2	102	101
1,4-Dichlorobenzene	7.5	0.05	ND	ND	106	2	104	106

	% RECOVERY
Dibromofluoromethane	91
Toluene-d8	93
4-Bromofluorobenzene	95

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	1/5/98	EPA 8260	1/6/98	RW	100 ea	100 ea

Director, Dr. Blair Leftwich

1-8-98
Date

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

January 16, 1998
Receiving Date: 01/03/98
Sample Type: Solid
Project No: NA
Project Location: NA

Extraction Date: 01/05/98
Analysis Date: 01/12/98
Sampling Date: 01/02/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T88310 D-334 ✓ Catalyst	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	68	12	5	85
1,4-Dichlorobenzene	7.5	0.05	ND	82	2	45	102
o-Cresol	200.0	0.05	ND	81	2	55	101
m,p-Cresol	200.0	0.05	ND	83	3	50	104
Hexachloroethane	3.0	0.05	ND	72	0	40	90
Nitrobenzene	2.0	0.05	ND	76	2	60	95
Hexachlorobutadiene	0.5	0.05	ND	72	4	43	90
2,4,6-Trichlorophenol	2.0	0.05	ND	76	4	48	95
2,4,5-Trichlorophenol	400.0	0.05	ND	78	2	50	98
2,4-Dinitrotoluene	0.13	0.05	ND	76	8	61	95
2,4-D	10.0	0.05	ND	76	12	377	95
Hexachlorobenzene	0.13	0.05	ND	80	9	70	100
2,4,5-TP	1.0	0.05	ND	70	10	224	88
Pentachlorophenol	100.0	0.05	ND	88	22*	53	110

****NOTE: RPD out of standard range.**

Surrogates	**% RECOVERY**
2-Fluorophenol	51
Phenol-d6	38
Nitrobenzene-d5	84
2-Fluorobiphenyl	78
2,4,6-Tribromophenol	77
Terphenyl-d14	108

Methods: EPA SW 846-1311, 8270.
CHEMIST: RP/HW
ND - Not Detected

Director, Dr. Blair Leftwich

1-16-98
DATE

TRACE ANALYSIS, INC.

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E-Mail: lab@traceanalysis.com

ANALYTICAL REPORT

CLIENT Navajo Refining Co.
501 E. Main
Artesia, NM 88211

SAMPLE NO. : 88310
INVOICE NO.: 22101465
REPORT DATE: 01-21-98
REVIEWED BY:
PAGE : 1 OF 2

CLIENT SAMPLE ID : D-334 Catalyst ✓
SAMPLE TYPE .....: Solid
SAMPLED BY .....: B. Madrid
SUBMITTED BY ....: B. Madrid
SAMPLE SOURCE ...: --
ANALYST .....: K. Costa

AUTHORIZED BY : B. Madrid
CLIENT P.O. : --
SAMPLE DATE ...: 01-02-98
SUBMITTAL DATE : 01-08-98
EXTRACTION DATE: --
ANALYSIS DATE .: 01-14-98

TCLP Pesticides by EPA 8081A

D A T A T A B L E

Parameter	Result	Unit	Detection Limit
Chlordane	<0.03	mg/L	0.03
Endrin	<0.02	mg/L	0.02
Heptachlor	<0.008	mg/L	0.008
Lindane	<0.4	mg/L	0.4
Methoxychlor	<10.	mg/L	10.
Heptachlor epoxide	<0.008	mg/L	0.008
Toxaphene	<0.5	mg/L	0.5

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ANALYTICAL RESULT(S) REPORTED HEREIN APPLY ONLY TO THE SAMPLE(S) TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY.

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ANALYTICAL REPORT

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E-Mail: lab@traceanalysis.com

CLIENT Navajo Refining Co.
501 E. Main
Artesia, NM 88211

SAMPLE NO. : 88310
INVOICE NO.: 22101465
REPORT DATE: 01-21-98
REVIEWED BY:

D A T A T A B L E (Cont.)

Surrogate Information -

	Percent Recovery	Range
Tetrachloro-m-Xylene	77.0	39-119
Decachlorobiphenyl	80.6	41-120

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Page ____ of ____

TraceAnalysis, Inc.

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Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

LAB Order ID # 15

Company Name: NAVAJO REFINING CO. Phone #: 505-748-3311

Address: 501 E. MAIN Fax #:

Contact Person: BRYAN MADRID

Invoice to: (If different from above)

Project #: Project Name:

Project Location: Sampler Signature: Bryan Madrid

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	SOLID	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME
88309	INSULATION PAPER	1	1L					X				X	1-2-98	11:00
10	D-334 CATALYST	1	1L					X				X	1-2-98	13:00
11	GREASE	1	1L					X				X	1-2-98	13:15
12	D-626	1	1L					X				X	1-2-98	13:30
13	D-642	1	1L					X				X	1-2-98	13:45

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ANALYSIS REQUEST

(Circle or Specify Method No.)

MTBE 8020/602	BTEX 8020/602	TPH	PAH 8270	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	GC.MS Vol. 8240/8260/624	GC/MS Semi. Vol. 8270/625	PCB's 8080/608	Pest. 8080/608	BOD, TSS, PH	Turn Around Time if different from standard	Hold
					X	X	X	X			X				
					X	X	X	X							
					X	X	X	X							
					X	X	X	X							
					X	X	X	X							

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Bryan Madrid	1-2-98	14:30			
Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received at Laboratory by: Vicki Whitaker	1-3-98	10:30 am

LAB USE ONLY

Intact (Y) / N

Headspace Y / N

Temp -2.1 °

Log-in Review

REMARKS:

D

H16

AI

Carrier # Fed Ex 334 4936 506

Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C.O.C.

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E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Jan 12, 1998
Date Rec: 1/8/98
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9801000076
Sampling Date: 1/7/98
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Vol in Sludge (mg/L)	EPA Limit	Reporting Limit	Method Blank	T88470 Slinger	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	8	0	82	81
1,1-Dichloroethene	0.7	0.05	ND	ND	9	0	82	92
Methyl Ethyl Ketone	200.0	0.50	ND	ND	11	0	101	116
Chloroform	6.0	0.05	ND	ND	11	0	98	110
1,2-Dichloroethane	0.5	0.05	ND	ND	11	0	99	112
Benzene	0.5	0.05	ND	0.12	9	0	96	98
Carbon Tetrachloride	0.5	0.05	ND	ND	10	0	102	101
Trichloroethene	0.5	0.05	ND	ND	9	0	95	92
Tetrachloroethane	0.7	0.05	ND	ND	8	0	97	82
Chlorobenzene	100.0	0.05	ND	ND	9	0	96	98
1,4-Dichlorobenzene	7.5	0.05	ND	ND	10	0	97	100

	% RECOVERY
Dibromofluoromethane	91
Toluene-d8	96
4-Bromofluorobenzene	96

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	1/8/98	EPA 8260	1/9/98	RW	100 ea	100 ea

Director, Dr. Blair Leftwich

1-12-98
Date

TRACE ANALYSIS, INC.

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E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

January 16, 1998
Receiving Date: 01/08/98
Sample Type: Sludge
Project No: NA
Project Location: NA

Extraction Date: 01/09/98
Analysis Date: 01/12/98
Sampling Date: 01/07/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T88470 Slinger	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	68	40**	5	85
1,4-Dichlorobenzene	7.5	0.05	ND	82	5	38	102
o-Cresol	200.0	0.05	0.08	81	5	46	101
m,p-Cresol	200.0	0.05	0.10	83	3	40	104
Hexachloroethane	3.0	0.05	ND	72	9	31	90
Nitrobenzene	2.0	0.05	ND	76	3	49	95
Hexachlorobutadiene	0.5	0.05	ND	72	7	41	90
2,4,6-Trichlorophenol	2.0	0.05	ND	76	5	43	95
2,4,5-Trichlorophenol	400.0	0.05	ND	78	8	44	98
2,4-Dinitrotoluene	0.13	0.05	ND	76	5	49	95
2,4-D	10.0	0.05	ND	76	7	293	95
Hexachlorobenzene	0.13	0.05	ND	80	2	56	100
2,4,5-TP	1.0	0.05	ND	70	2	178	88
Pentachlorophenol	100.0	0.05	ND	88	10	44	110

****NOTE: RPD out of standard range.**

Surrogates	**% RECOVERY**
2-Fluorophenol	48
Phenol-d6	36
Nitrobenzene-d5	82
2-Fluorobiphenyl	72
2,4,6-Tribromophenol	80
Terphenyl-d14	95

Methods: EPA SW 846-1311, 8270.
CHEMIST: RP/HW
ND - Not Detected

Director, Dr. Blair Leftwich

1-16-98
DATE

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

January 16, 1998
Receiving Date: 01/08/98
Sample Type: Sludge
Project No: NA
Project Location: NA

Extraction Date: 01/08/98
Analysis Date: 01/09/98
Sampling Date: 01/07/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cr	Cd	Pb	Ag	Ba	Hg
	EPA LIMIT =	5.0	1.0	5.0	1.0	5.0	5.0	100.0	0.20
T88470	Slinger	0.16	<0.10	0.22	<0.02	<0.10	0.29	0.60	<0.05
QC	Quality Control	5.2	5.3	5.0	4.8	5.4	1.0	5.1	0.05
Reporting Limit		0.10	0.10	0.05	0.02	0.10	0.05	0.10	0.05
RPD		0	0	5	5	0	0	0	0
% Extraction Accuracy		105	115	105	95	110	88	105	108
% Instrument Accuracy		104	106	100	96	108	100	102	100

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CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba: HC Hg:
METHODS: EPA SW 846-1311, 6010B, 7470.
TCLP METALS SPIKE: 20 mg/L As, Se, Cd, Cr, Pb, Ba; 0.25 mg/L Ag; 0.05 mg/L Hg.
TCLP METALS QC: 5.0 mg/L As, Se, Cd, Cr, Pb, Ba; 1.0 mg/L Ag; 0.05 mg/L Hg.

BL

Director, Dr. Blair Leftwich

1-16-98

Date

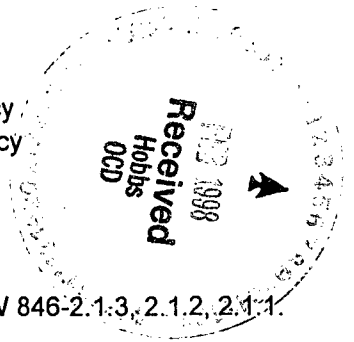
TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

January 16, 1998
Receiving Date: 01/08/98
Sample Type: Sludge
Project No: NA
Project Location: NA

Extraction Date: 01/13/98
Analysis Date: 01/13/98
Sampling Date: 01/07/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	IGNITABILTY
	EPA LIMIT =	---	500	250	---	<2 >12.5	---
T88470	Slinger	Non-reactive	<10	<2.5	Non-corrosive	9.0	Nonignitable
QC	Quality Control	---	---	---	---	7.0	---
RPD		0	0	0	0	0	0
% Extraction Accuracy		---	---	---	---	---	---
% Instrument Accuracy		---	---	---	---	100	---



METHODS: EPA SW 846-2.1.3, 2.1.2, 2.1.1.
CHEMIST: JG

Director, Dr. Blair Leftwich

1-16-98
DATE

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ANALYTICAL REPORT

CLIENT Navajo Refining Co.
501 E. Main
Artesia, NM 88211

SAMPLE NO. : 88470
INVOICE NO.: 22101464
REPORT DATE: 01-21-98
REVIEWED BY:
PAGE : 1 OF 2

CLIENT SAMPLE ID : Slinger
SAMPLE TYPE .....: Sludge
SAMPLED BY .....: B. Madrid
SUBMITTED BY ....: B. Madrid
SAMPLE SOURCE ...: --
ANALYST .....: K. Costa

AUTHORIZED BY : B. Madrid
CLIENT P.O. : --
SAMPLE DATE ...: 01-07-98
SUBMITTAL DATE : 01-08-98
EXTRACTION DATE: 01-14-98
ANALYSIS DATE .: 01-16-98

TCLP Pesticides by EPA 8081A

D A T A T A B L E

Parameter	Result	Unit	Detection Limit
Chlordane	<0.03	mg/L	0.03
Endrin	<0.02	mg/L	0.02
Heptachlor	<0.008	mg/L	0.008
Lindane	<0.4	mg/L	0.4
Methoxychlor	<10.	mg/L	10.
Heptachlor epoxide	<0.008	mg/L	0.008
Toxaphene	<0.5	mg/L	0.5

FEB 1998
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TRACE ANALYSIS, INC.

ANALYTICAL REPORT

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E-Mail: lab@traceanalysis.com

CLIENT Navajo Refining Co.
501 E. Main
Artesia, NM 88211

SAMPLE NO. : 88470
INVOICE NO.: 22101464
REPORT DATE: 01-21-98
REVIEWED BY:

D A T A T A B L E (Cont.)

Surrogate Information -

	Percent Recovery	Range
Tetrachloro-m-Xylene .....:	85.4	39-119
Decachlorobiphenyl .....:	87.1	41-120

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E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Jan 12, 1998
Date Rec: 1/8/98
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9801000075
Sampling Date: 1/7/98
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Vol in Solid (mg/L)	EPA Limit	Reporting Limit	Method Blank	T88469 D-41 Sulfur Guard	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	8	0	82	81
1,1-Dichloroethene	0.7	0.05	ND	ND	9	0	82	92
Methyl Ethyl Ketone	200.0	0.50	ND	ND	11	0	101	116
Chloroform	6.0	0.05	ND	ND	11	0	98	110
1,2-Dichloroethane	0.5	0.05	ND	ND	11	0	99	112
Benzene	0.5	0.05	ND	ND	9	0	96	98
Carbon Tetrachloride	0.5	0.05	ND	ND	10	0	102	101
Trichloroethene	0.5	0.05	ND	ND	9	0	95	92
Tetrachloroethane	0.7	0.05	ND	ND	8	0	97	82
Chlorobenzene	100.0	0.05	ND	ND	9	0	96	98
1,4-Dichlorobenzene	7.5	0.05	ND	ND	10	0	97	100

	% RECOVERY
Dibromofluoromethane	90
Toluene-d8	94
4-Bromofluorobenzene	95

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	1/8/98	EPA 8260	1/9/98	RW	100 ea	100 ea

Director, Dr. Blair Leftwich

1-12-98
Date

TRACE ANALYSIS, INC.

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E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

January 16, 1998
Receiving Date: 01/08/98
Sample Type: Solid
Project No: NA
Project Location: NA

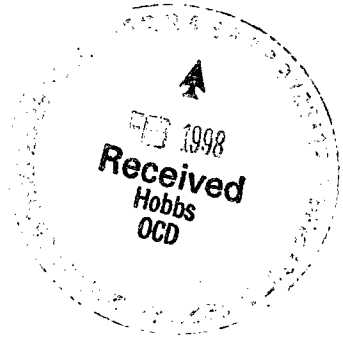
Extraction Date: 01/09/98
Analysis Date: 01/12/98
Sampling Date: 01/07/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T88469 D-41 Sulfur Guard	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	68	40**	5	85
1,4-Dichlorobenzene	7.5	0.05	ND	82	5	38	102
o-Cresol	200.0	0.05	ND	81	5	46	101
m,p-Cresol	200.0	0.05	ND	83	3	40	104
Hexachloroethane	3.0	0.05	ND	72	9	31	90
Nitrobenzene	2.0	0.05	ND	76	3	49	95
Hexachlorobutadiene	0.5	0.05	ND	72	7	41	90
2,4,6-Trichlorophenol	2.0	0.05	ND	76	5	43	95
2,4,5-Trichlorophenol	400.0	0.05	ND	78	8	44	98
2,4-Dinitrotoluene	0.13	0.05	ND	76	5	49	95
2,4-D	10.0	0.05	ND	76	7	293	95
Hexachlorobenzene	0.13	0.05	ND	80	2	56	100
2,4,5-TP	1.0	0.05	ND	70	2	178	88
Pentachlorophenol	100.0	0.05	ND	88	10	44	110

****NOTE: RPD out of standard range.**

Surrogates	**% RECOVERY**
2-Fluorophenol	32
Phenol-d6	24
Nitrobenzene-d5	57
2-Fluorobiphenyl	50
2,4,6-Tribromophenol	50
Terphenyl-d14	90

Methods: EPA SW 846-1311, 8270.
CHEMIST: RP/HW
ND - Not Detected



Director, Dr. Blair Leftwich

1-16-98
DATE

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

January 16, 1998
Receiving Date: 01/08/98
Sample Type: Solid
Project No: NA
Project Location: NA

Extraction Date: 01/08/98
Analysis Date: 01/09/98
Sampling Date: 01/07/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cr	Cd	Pb	Ag	Ba	Hg
	EPA LIMIT =	5.0	1.0	5.0	1.0	5.0	5.0	100.0	0.20
T88469	D-41 Sulfur Guard	<0.10	<0.10	0.20	<0.02	<0.10	<0.05	0.28	<0.05
QC	Quality Control	5.2	5.3	5.0	4.8	5.4	1.0	5.1	0.05
Reporting Limit		0.10	0.10	0.05	0.02	0.10	0.05	0.10	0.05
RPD		0	0	5	5	0	0	0	0
% Extraction Accuracy		105	115	105	95	110	88	105	108
% Instrument Accuracy		104	106	100	96	108	100	102	100

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CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba: HC Hg:
METHODS: EPA SW 846-1311, 6010B, 7470.
TCLP METALS SPIKE: 20 mg/L As, Se, Cd, Cr, Pb, Ba; 0.25 mg/L Ag; 0.05 mg/L Hg.
TCLP METALS QC: 5.0 mg/L As, Se, Cd, Cr, Pb, Ba; 1.0 mg/L Ag; 0.05 mg/L Hg.

Director, Dr. Blair Leftwich

1-16-98
Date

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

January 16, 1998
Receiving Date: 01/08/98
Sample Type: Solid
Project No: NA
Project Location: NA

Extraction Date: 01/13/98
Analysis Date: 01/13/98
Sampling Date: 01/07/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	IGNITABILTY
	EPA LIMIT =	---	500	250	---	<2 >12.5	---
T88469	D-41 Sulfur Guard	Non-reactive	<10	<2.5	Non-corrosive	4.2	Nonignitable
QC	Quality Control	---	---	---	---	7.0	---
RPD		0	0	0	0	0	0
% Extraction Accuracy		---	---	---	---	---	---
% Instrument Accuracy		---	---	---	---	100	---

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JAN 1998

METHODS: EPA SW 846-2.1.3, 2.1.2, 2.1.1
CHEMIST: JG

Director, Dr. Blair Leftwich

1-16-98
DATE

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL REPORT

CLIENT Navajo Refining Co.
501 E. Main
Artesia, NM 88211

SAMPLE NO. : 88469
INVOICE NO.: 22101464
REPORT DATE: 01-21-98
REVIEWED BY:
PAGE : 1 OF 2

CLIENT SAMPLE ID : D-41 Sulfur Guard
SAMPLE TYPE .....: Catalyst
SAMPLED BY .....: B. Madrid
SUBMITTED BY ....: B. Madrid
SAMPLE SOURCE ...: --
ANALYST .....: K. Costa

AUTHORIZED BY : B. Madrid
CLIENT P.O. : --
SAMPLE DATE ...: 01-07-98
SUBMITTAL DATE : 01-08-98
EXTRACTION DATE: 01-14-98
ANALYSIS DATE .: 01-14-98

TCLP Pesticides by EPA 8081A

D A T A T A B L E

Parameter	Result	Unit	Detection Limit
Chlordane	<0.03	mg/L	0.03
Endrin	<0.02	mg/L	0.02
Heptachlor	<0.008	mg/L	0.008
Lindane	<0.4	mg/L	0.4
Methoxychlor	<10.	mg/L	10.
Heptachlor epoxide	<0.008	mg/L	0.008
Toxaphene	<0.5	mg/L	0.5

FEB 1998
Received
Hobbs
OCD

(1) Copy to Client

ANALYTICAL RESULT(S) REPORTED HEREIN APPLY ONLY TO THE SAMPLE(S) TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY.

MANAGING DIRECTOR

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL REPORT

CLIENT Navajo Refining Co.
501 E. Main
Artesia, NM 88211

SAMPLE NO. : 88469
INVOICE NO.: 22101464
REPORT DATE: 01-21-98
REVIEWED BY:

D A T A T A B L E (Cont.)

Surrogate Information -

	Percent Recovery	Range
Tetrachloro-m-Xylene .....:	81.2	39-119
Decachlorobiphenyl .....:	74.5	41-120

FEB 1998
Received
Hobbs
OCD

(1) Copy to Client

88469 -70

Star Enterprise

Page ____ of ____

TraceAnalysis, Inc.

6701 Aberdeen Avenue, Ste. 9 Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

LAB Order ID # 75 / 76

Consulting Company Name: NAVAJO REFINING CO. Phone #: 505-748-3311

Address: 501 E. MAIN Fax #:

Consulting Contact: BRYAN MADRID Star Contract:

Location Code: Casuality Loss #: Star Job #

Consultant Job #

Location Address: Sampler Signature: Bryan Madrid

ANALYSIS REQUEST
(Circle or Specify Method No.)

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	OTHER: Catalyst	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME
88469	D-41 Sulfur Guard							X				X	1/7/98	14:00
70	SLINGER ~~SLUDGE~~						X					X	1/7/98	14:15
								Solid						

MTBE 8020/602	BTEX 8020/602	TPH	PAH 8270	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	GC.MS Vol. 8240/8260/624	GC/MS Semi. Vol. 8270/625	PCB's 8080/608	Pest. 8080/608	BOD, TSS, PH					Turn Around Time if different from standard	Hold
					X	X	X	X											
					X	X	X	X											

Received Hobbs OCD JAN 1998

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Bryan Madrid	1-7-98	16:15			
Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received at Laboratory by:	Date:	Time:
			Vicki Windham	1-8-98	10:20 AM

LAB USE ONLY
Intact Y N
Headspace Y / N
Temp -1 °
Log-in Review B

REMARKS:
1-16

Carrier # Fed Ex 334 5636 777

Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C.O.C.

ORIGINAL COPY

...1980
..., NM 88241-1980
...ico II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-13
Originated 8/8/9

Submit Origin
Plus 1 Cop
to appropria
District Offi

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Verbal Approval Received: Yes ☐ No ☐	4. Generator Navajo Refining
	5. Originating Site Artesia Facilit
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Triad
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State NM
7. Location of Material (Street Address or ULSTR) 501 E Main	Artesia, NM

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator, one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

RECEIVED
SEP 08 1997
Environmental Bureau
Oil Conservation Division

BRIEF DESCRIPTION OF MATERIAL:

The following information is for a waste generated at the Navajo Refining Plant in Artesia. The waste is generated on a daily basis. These are fine particles of regenerated catalyst that are collected from the cyclones at the FCC unit. The catalyst is regenerated using hot air to burn carbon dioxide off of the material. The air is then removed using teritary cyclones and the smaller particles of catalyst come out with the air. They are generated by the breaking up of the larger particles of catalyst. I have included a certificate of waste, a chain of waste, and a letter stating that the waste stream has not changed. This waste has been approved in the past.

Received
Hobbs
1998

Received
Hobbs

Estimated Volume 17 super sacks in a 20 yard roll-off box or Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE Billie Charo (Waste Management Facility/Authorized Agent) TITLE Office Manager DATE 08/22/97

TYPE OR PRINT NAME Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE Envir Spvr DATE 8/24/97

APPROVED BY: Martyna J Kieling TITLE Env Geologist DATE 8/9/97

Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
FEB 19 1997
OIL CON. DIV.
DIST. 2

Originated 8/8
Submit Origi
Plus 1 C
to appropri
District Off

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Verbal Approval Received: Yes ☐ No ☐	4. Generator Navajo Refining 5. Originating Site Artesia Facility
2. Management Facility Destination Controlled REcovery, Inc.	6. Transporter Triad
3. Address of Facility Operator P.O. Box 369 Hobbs,	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E Main Artesia	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

OIL CON. DIV.
DIST. 2
FEB 20 1997
RECEIVED

BRIEF DESCRIPTION OF MATERIAL:

The following is from the Navajo Refining Artesia facility. The waste was generated from the cleanup of chloride guard at the Artesia facility. The material is a filter media used to remove chloride form catalyst in the CCR unit. It is made up of zinc oxide. This material has been approved in the past and CRI would once again like to dispose of this material at our faciltiy. I have included a certificate of waste, a chain of custody, and a letter stating that the waste stream has not changed.

OIL CON. DIV.
DIST. 2
FEB 18 1997
RECEIVED

FEB 1998
Received
Hobbs
OCD

Estimated Volume 60 yards cy Known Volume (to be entered by the Operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Office Manager DATE: 02/17/97

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: 2/18/97

APPROVED BY: _____ TITLE: _____ DATE: 2/26/97

Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C
Originated

Submit O
Plus 1
to appr
District

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator NAVAJO REFINING
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site LOVINGTON FACI
2. Management Facility Destination CONTROLLED RECOVERY, INC.	6. Transporter D & T BACKHOE
3. Address of Facility Operator P.O. BOX 369 HOBBS	8. State NEW MEXICO
7. Location of Material (Street Address or ULSTR) 501 E MAIN ARTESIA NEW MEXICO	

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not hazardous and the Generator's certification of origin. NO waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

RECEIVED
SEP 16 1996
Environmental Bureau
Oil Conservation Division

BRIEF DESCRIPTION OF MATERIAL:

THE FOLLOWING ANALYTICAL IS FOR THE NAVAJO REFINING LOVINGTON FACILITY. THE ASPHALT ANALYSIS IS FROM ARTESIA BUT THERE SHOULD BE NO DIFFERENCE IN THE ASPHALT FROM THE TWO PLANTS PER KEN KAUFMAN'S LETTER FROM DARRELL MOORE. THE MATERIAL FOR APPROVAL IS FROM A RUN OVER ON AN ASPHALT RAIL CAR AT THE LOADING RACK AND THEN SCOOPED UP THE ASPHALT, GRAVEL AND SOIL WHEN THEY CLEANED UP THE SPILL. I HAVE INCLUDED A CERTIFICATE OF WASTE AND A CHAIN OF CUSTODY.

OCD HOBBS OFFICE SEP 1998 RECEIVED

OCD HOBBS OFFICE SEP 08 1998 RECEIVED

SEP 1998 Received Hobbs OCD

Estimated Volume 150 yds cy Known Volume (to be entered by the operator at the end of the haul) cy

SIGNATURE: Billie Charo TITLE: OFFICE MANAGER DATE: 09/09/96
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: BILLIE CHARO TELEPHONE NO.: 505-393-1079

(This Space for State Use)

APPROVED BY: [signature] TITLE: Env. Insp. DATE: 9/16/96

APPROVED BY: [signature] TITLE: Bureau Chief DATE: 9/17/96

Martyne Kieling

From: Price, Wayne
Sent: Wednesday, December 31, 1997 11:14 AM
To: Martyne Kieling
Cc: Chris Williams
Subject: CRI/Navajo Lovington C-138 Dated 12/22/97

Dear Martyne:

Please note I am dropping in the mail today the above referenced C-138.

There were five items:

I approved the following :

#1- Crude tower sludge
#3- Hydrocarbon contaminated soil
#4- Flare line sludge
#5- Cooling tower sludge.

Item # 2- Desalter sludge (1000 bbls) I am recommending for us to hold until we receive a ruling.

Please note we have previously approved desalter sludge from Navajo-Artesia, however CRI indicated this material was going to be re-cycled thus excluding it from being a waste. They have not indicated what their plans are on this waste. Navajo's analytical for full TCLP is non-hazardous.

Item of concern: Since the Desalter sludge comes in contact with plant wastewater's which could be classified as F037 & F038 listed Hazardous waste, then does this make this sludge hazardous waste.

I have performed the following research:

Contacted RCRA hot line; referred to Fed. Reg. Nov 2, 1990 55FR46354, & May 13, 1991 56FR21955.
I do not have access to these. According to RCRA HTL they referenced Desalter wastewater sludge.
If you can access these if might help.

Called NMED- out of office.
Called EPA-Dallas- Discussed with Joel Dougherty works for Passia, His preliminary research indicated it would probably be hazardous, however he wanted to check with EPA DC personnel who were more knowledgeable on this issue. He will call back. Please feel free to call him at 214-665-2281 direct line.

Called Bryan Madrid-Navajo Environmental Specialist- Bryan indicated he did not have any ruling from any agency except the fact that the NMOCD had approved in the past.

Sampling & Testing concern: They indicate this material is 1000 bbls. Which would indicate it is part liquid. Did laboratory per TCLP 1311 procedure sample the liquid phase also?

Common sense approach: I am somewhat familiar with Refinery Desalters and realize this material probably does not present any other environmental concern than would any ordinary crude oil or crude oil tank bottoms, plus the fact that it is TCLP non-hazardous.

Regulatory Concern: I want to make sure the NMOCD permitted facilities and the Refinery generator do not accidentally dispose of any hazardous waste by definition into permitted facilities that can only take non-hazardous materials. This caution hopefully is for everyone's protection.

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
MAR 11 1998
Environmental B
Conservation Divis

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Triad Trucking
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E Main Artesia	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

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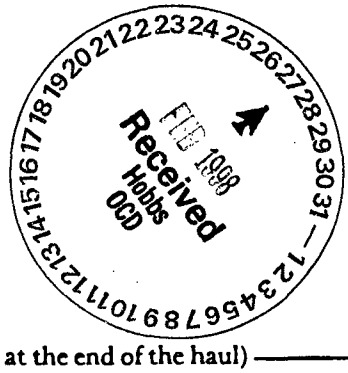
All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

Please see attached letter.

02-018



Sent to Hobbs 3-11-98

Estimated Volume 700 - 800 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Environmental Compliance Manager DATE: 02/20/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR DATE: 2/29/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 3/11/98

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
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New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to appropr
District O

RECEIVED
MAR 11 1998
Environmental Bureau
Oil Conservation Division

MAR 1998
RECEIVED
OCD ARTESIA

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Triad Trucking
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E Main Artesia	New Mexico

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All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

Please see attached letter.

ATT: TIM GUM PLEASE REVIEW & FORWARD TO MARTYNS KIELING IN S.F.
THANKS
LAYNE

02-018

FEB 1998
Received
Hobbs
OCD

Estimated Volume 700 - 800 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Environmental Compliance Manager DATE: 02/20/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR 3/6/98 DATE: 2/29/98

APPROVED BY: _____ TITLE: _____ DATE: _____

TELEPHONE
(505) 748-3311

EASYLINK
62905278

Navajo REFINING COMPANY

501 EAST MAIN STREET • P. O. BOX 159
ARTESIA, NEW MEXICO 88211-0159

FAX
(505) 746-6410 ACCTG
(505) 746-6155 EXEC
(505) 748-9077 ENGR
(505) 746-4438 P / L

February 19, 1998

Ken Marsh
CRI Inc.
P.O. Box 369
Hobbs, NM 88241

Dear Mr. Marsh:

Enclosed you will find the analysis from a waste we are calling Tk 63 slurry. Tk 63 was cleaned out in December of 1996 and the sludge sent to your facility. It was resampled and reapproved on September of 1997. For the final clean out, we used the enclosed analysis to get approval from OCD. We are now planning to clean out a tank called Tk 62. This tank contains the exact same material as Tk 63 except that the slurry from Tk 62 has gone through the slingers. This means that the slurry has most of the cat fines slung out of it. We would like to use the above mentioned analysis to also get the material from Tk 62 approved for disposal. This tank is similar in size to Tk 63 and will have about 700 - 800 yards of waste in it. This material is tentatively scheduled to be hauled by Triad Trucking in 20 yard roll off bins.

If you have any questions pertaining to this matter, please call me at (505) 748-3311. Thank you for your time.

Sincerely,

Bryan Madrid

Bryan Madrid
Environmental Specialist

Encl.

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO.

Sources: PETROLEUM REFINING - TK 62 SLURRY

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING CO. concur with the status of the waste from the subject site.

Name BRYAN MADRID

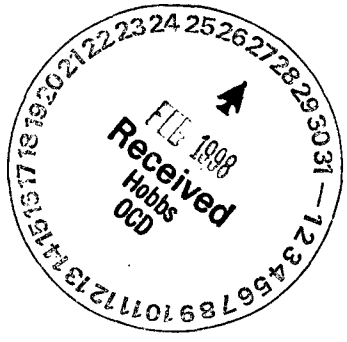
Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 2/19/98



Pace Analytical Services, Inc.
161 James Drive West, Suite 100
St. Rose, LA 70087
Tel: 504-469-0333
Fax: 504-469-0555

Pace Analytical

Darrell Moore
Navajo Refining Co.
Post Office Box 159
Artesia, NM 88211

Project: TCLP'S
Site:
Episode: IUA

To: Darrell Moore

Enclosed please find the analytical results for sample(s) received by Pace Analytical Services, Inc. - New Orleans.

This report contains a summary of the quality control data associated with the analyses as well as copies of the chain-of-custody documents.

You may direct any inquires concerning this report to your Project Manager, or any one of the Project Managers listed below:

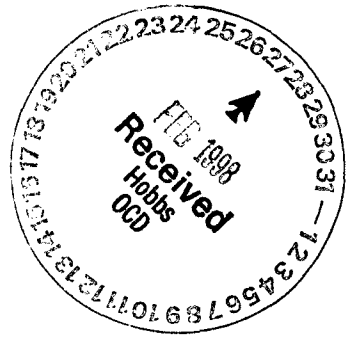
Ms. Karen H. Brown, Manager, Ext. 325
Mr. Craig McCollum, Ext. 326
Ms. Cindy Olavesen, Ext. 327

Sincerely,

Karen H Brown
Project Manager

9/10/97
Date

Enclosures



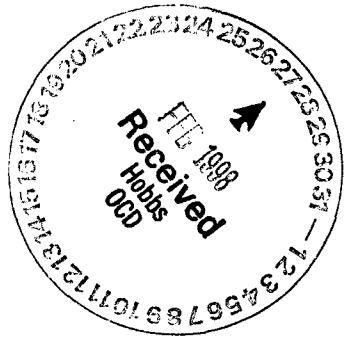
Pace Analytical Services, Inc. - New Orleans
Sample Cross Reference Summary

Episode: IUA Client: Navajo Refining Co.

Project: TCLP'S

Site:

Lab ID	Client ID	Description	Matrix	Collected	Received
IUA-001	TK63 SLURRY	SLUDGE	Other	08/29/97	08/30/97
IUA-002	T-501 VACUUM	TOWER COKE	Other	08/29/97	08/30/97



Report of Laboratory Analysis

Pace Analytical Services, Inc. - New Orleans

Single Sample - Protocol

Client ID:	TK63 SLURRY	**Client:**	NAVAJO REFINING CO.
Project:	TCLP'S	**Site:**	None
Lab ID:	IUA-001 Leachate	**Episode:**	IUA
Description:	SLUDGE	**Matrix:**	Other
Method:	Leachate SW 8240 TCLP Volatile Organics	**Batch:**	23479

Sample Qu:

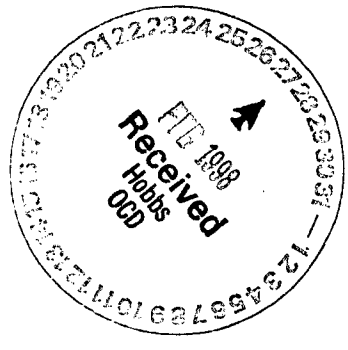
% Moisture: n/a

Units: mg/l

Prep Factor: 1.00 **Leached:** 9/3/97 **Prepared:** **Analyzed:** 09-Sep-97 15:16 KC

CAS Number	Parameter	Dilution	Result	Qu	Reporting Limit	Reg. Limit
71-43-2	Benzene	2	0.133	D2 C3	0.100	0.500
78-93-3	2-Butanone (Methyl ethyl ketone)	2	ND	D2 C3	0.200	200
56-23-5	Carbon tetrachloride	2	ND	D2 C3	0.100	0.500
108-90-7	Chlorobenzene	2	ND	D2 C3	0.100	100
67-66-3	Chloroform	2	ND	D2 C3	0.100	6.00
107-06-2	1,2-Dichloroethane (Ethylene dichloride)	2	ND	D2 C3	0.100	0.500
75-35-4	1,1-Dichloroethene (Dichloroethylene)	2	ND	D2 C3	0.100	0.700
127-18-4	Tetrachloroethene (Perchloroethylene)	2	ND	D2 C3	0.100	0.700
79-01-6	Trichloroethene (Trichloroethylene)	2	ND	D2 C3	0.100	0.500
75-01-4	Vinyl chloride (Chloroethene)	2	ND	D2 C3	0.200	0.200

10 compound(s) reported



ND denotes Not Detected at or above the adjusted reporting limit.
DF denotes Dilution Factor of extract. The Prep Factor accounts for a non-routine sample size.
Reporting Limit is corrected for sample size, dilution and moisture content if applicable.
Qu lists qualifiers. Specific qualifiers are defined at the end of the report.
For moisture results, wet denotes result is not corrected for moisture and n/a denotes not applicable.

Report of Laboratory Analysis

Pace Analytical Services, Inc. - New Orleans

Single Sample - Protocol

Client ID:	TK63 SLURRY	**Client:**	NAVAJO REFINING CO.
Project:	TCLP'S	**Site:**	None
Lab ID:	IUA-001 Leachate	**Episode:**	IUA
Description:	SLUDGE	**Matrix:**	Other
Method:	Leachate SW 8270 TCLP Semivolatile Organics	**Batch:**	23471

Sample Qu:

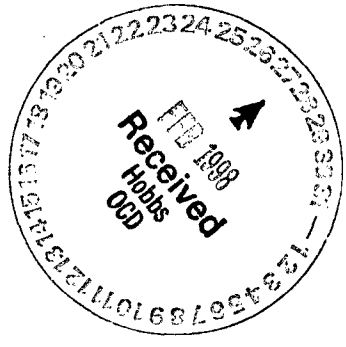
% Moisture: n/a

Units: mg/l

Prep Factor: 1.00 **Leached:** 9/3/97 **Prepared:** 04-Sep-97 **Analyzed:** 09-Sep-97 13:16 JA

CAS Number	Parameter	Dilution	Result	Qu	Reporting Limit	Reg. Limit
106-46-7	1,4-Dichlorobenzene (p-Dichlorobenzene)	1	ND	C3	0.0400	7.50
51-28-5	2,4-Dinitrotoluene	1	ND	C3	0.0400	0.130
118-74-1	Hexachlorobenzene	1	ND	C3	0.0400	0.130
118-74-1	Hexachlorobutadiene	1	ND	C3	0.0400	0.500
67-72-1	Hexachloroethane	1	ND	C3	0.0400	3.00
95-48-7	2-Methylphenol (o-Cresol)	1	0.283	C3	0.0400	200
108-39-4	3-Methylphenol (m-Cresol)	4	ND	A7 D1 C3	0.160	200
106-44-5	4-Methylphenol (p-Cresol)	4	0.622	D1 C3	0.160	200
98-95-3	Nitrobenzene	1	ND	C3	0.0400	2.00
87-86-5	Pentachlorophenol	1	ND	C3	0.100	100
110-86-1	Pyridine	1	ND	C3	0.0400	5.00
95-95-4	2,4,5-Trichlorophenol	1	ND	C3	0.100	400
88-06-2	2,4,6-Trichlorophenol	1	ND	C3	0.0400	2.00

13 compound(s) reported



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For moisture results, wet denotes result is not corrected for moisture and n/a denotes not applicable.

9/10/97 18:30:43

Report of Laboratory Analysis

Pace Analytical Services, Inc. - New Orleans

Single Sample - Inorganic Parameters

Client ID: TK63 SLURRY
Client: NAVAJO REFINING CO.
Project: TCLP'S
Site: None
Lab ID: IUA-001 Leachate
Episode: IUA
Description: SLUDGE
Matrix: Other
%Moisture: n/a

ParameterName	Method	Batch	DF	PF	Result	Qu	Units	Reporting Limit	Prep.	Analysis		Reg. Limit
Arsenic	SW 6010	23585	1	1	ND	C3	mg/l	1.00	04-Sep-97	04-Sep-97	16:33 KJR	5.00
Barium	SW 6010	23585	1	1	ND	C3	mg/l	1.00	04-Sep-97	04-Sep-97	16:33 KJR	100
Cadmium	SW 6010	23585	1	1	ND	C3	mg/l	0.100	04-Sep-97	04-Sep-97	16:33 KJR	1.00
Chromium	SW 6010	23585	1	1	0.656	C3	mg/l	0.500	04-Sep-97	04-Sep-97	16:33 KJR	5.00
Lead	SW 6010	23585	1	1	ND	C3	mg/l	0.500	04-Sep-97	04-Sep-97	16:33 KJR	5.00
Mercury	SW 7470	23584	1	1	ND	C3	mg/l	0.0002	04-Sep-97	04-Sep-97	18:12 KJR	0.200
Selenium	SW 6010	23585	1	1	ND	C3	mg/l	0.200	04-Sep-97	04-Sep-97	16:33 KJR	1.00
Silver	SW 6010	23585	1	1	ND	C3	mg/l	0.500	04-Sep-97	04-Sep-97	16:33 KJR	5.00

8 parameter(s) reported

ND denotes Not Detected at or above the adjusted reporting limit.
DF denotes Dilution Factor of final sample. The Prep Factor accounts for a non-routine sample size.
Reporting Limit is corrected for sample size, dilution and moisture content if applicable.
Qu lists qualifiers. Specific qualifiers are defined at the end of the report.
For moisture results, wet denotes result is not corrected for moisture and n/a denotes not applicable.

9/10/97 18:32:06

Report of Laboratory Analysis

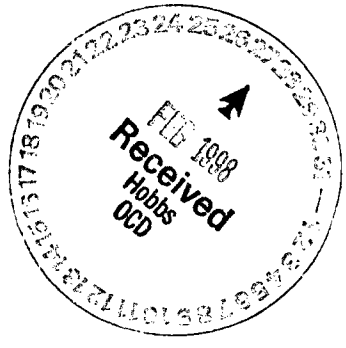
Pace Analytical Services, Inc. - New Orleans

Single Sample - Inorganic Parameters

Client ID: TK63 SLURRY
Client: NAVAJO REFINING CO.
Project: TCLP'S
Site: None
Lab ID: IUA-001
Episode: IUA
Description: SLUDGE
Matrix: Other
%Moisture: n/a

ParameterName	Method	Batch	DF	PF	Result	Qu	Units	Reporting Limit	Prep.	Analysis		Reg. Limit
pH-Corrosivity	SW 9045	23603	1	1	7.62	C3	S.U.			02-Sep-97	DM	
Reactive Cyanide	SW 7.3.3.2	23553	1	1	ND	C3	mg/kg	25.0	04-Sep-97	05-Sep-73	MH	
Reactive Sulfide	SW 7.3.4.2	23553	1	1	ND	C3	mg/kg	50.0	04-Sep-97	04-Sep-97	DM	

3 parameter(s) reported



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For moisture results, wet denotes result is not corrected for moisture and n/a denotes not applicable.

9/10/97 18:33:29

RCRA Characteristic - Ignitability

For non-liquid samples the EPA methods and guidelines for judging samples as meeting the characteristic of ignitability are ill- defined. For liquid samples, a closed cup flashpoint test is performed and this allows the determination of a flash temperature.

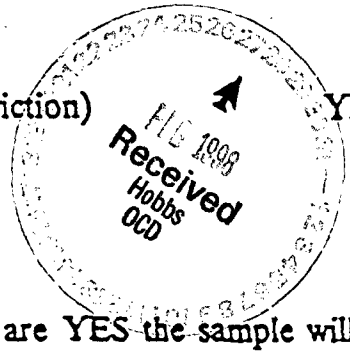
For the non-liquid samples the regulation specifically states:

> "It is not a liquid and is capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard" and there is no method referenced.

In order to determine whether samples meet this characteristic we have devised the following set of tests, and present the results of each component to our clients. As opposed to the temperature of flashpoint presented for liquid samples, only a YES or NO is provided as final data for the determination of non-liquid Ignitability.

Test Components

A)	sample undergoes spontaneous combustion	YES or NO
B)	sample ignites when moisture added (water)	YES or NO
C)	sample burns vigorously when lit with a flame (open container)	YES or NO
D)	sample ignites when agitated (friction)	YES or NO



Determination:

> If any of the A, B, or D components are YES the sample will be determined as Ignitable. If only C is YES, the sample would still NOT meet the criteria and the sample would be deemed NON IGNITABLE.

If you have any questions with regard to procedures or data, please contact our laboratory.

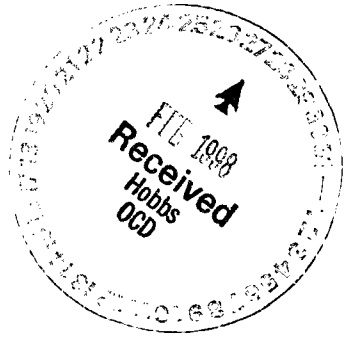
Analytical Results - Conventional Parameters

Navajo Refining Company

Non-Liquid Ignitability Data Sheet

Prepared Date: NA
Analyzed Date: 9/4/97 @ 16:00

Client ID/ Lab ID	Spontaneous Ignition	Ignitable With Moisture	Ignites When Agitated	Burns Vigorously When Lit	Meet Ignitable Characteristic
TK63 SLURRY SLUDGE (IUA-001)	No	No	No	No	No
T-501 VACUUM TOWER COKE (IUA-002)	No	No	No	No	No



Pace Analytical

389182

CHAIN-OF-CUSTODY RECORD
Analytical Request

Client NAVAJO REFINING Co.	Report To:	Turn around Time	Pace Client No.
Address 501 E. MAIN ARTESIA, NM 88210	Bill To:	☐ 24 Hours ☐ 48 Hours ☐ 3-5 Days ☐ 1 Week 2 Weeks ☐ Normal 14 Days	Pace Project Manager
	P.O. # / Billing Reference		Pace Project No.
Phone	Project Name / No.		*Requested Due Date:

Sampled By (PRINT): BRYAN MADRID
Sampler Signature: Bryan Madrid
Date Sampled: 8-29-97

ITEM NO.	SAMPLE DESCRIPTION	TIME	MATRIX	PACE NO.	NO. OF CONTAINERS	PRESERVATIVES: UNPRESERVED	H_2SO_4	HNO_3	VOA (HCL)	NaOH	$Na_2S_2O_3$	ANALYSES REQUEST: TCLP-Voa	TCLP-Svoa	RCI	REMARKS
1	TR63 SLURRY SLUDGE	13:00			3	3						X	X	X	
2	T-501 VACUUM TOWER COKE	13:30			3	3						X	X	X	
3															
4															
5															
6															
7															
8															

Received Hobbs OCD AUG 29 1997

COOLER NOS.	BAILERS	SHIPMENT METHOD OUT/DATE	SHIPMENT METHOD RETURNED/DATE

ITEM NUMBER	RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME
	Bryan Madrid Fed Ex	8/29/97	1615	Fed Ex Karen Hixson/Pace	8/30/97	0930

Additional Comments

T-501 FROM LOVINGTON

2°C ICE

SAMPLE CONDITION

Temp: 2 °C	Received on Ice: (Y) N	Sealed Cooler: (Y) N	Samples Intact: (Y) N	pH

SEE REVERSE SIDE FOR INSTRUCTIONS

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
MAR 31 1998
Environmental Bureau
Oil Conservation Division

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter B & H
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E Main Street Artesia	New Mexico

9. Circle One:

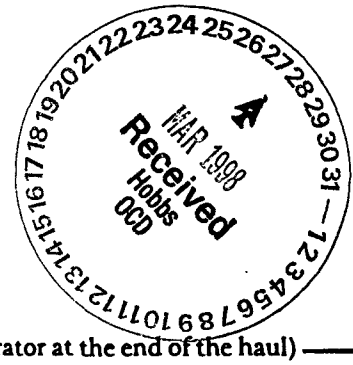
A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajo Refining Artesia facility. The material was generated by a tank overflow. I have included a certificate of waste and a chain of custody.



Mailed to Hobbs 3/31/98

03-016

Estimated Volume 30 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

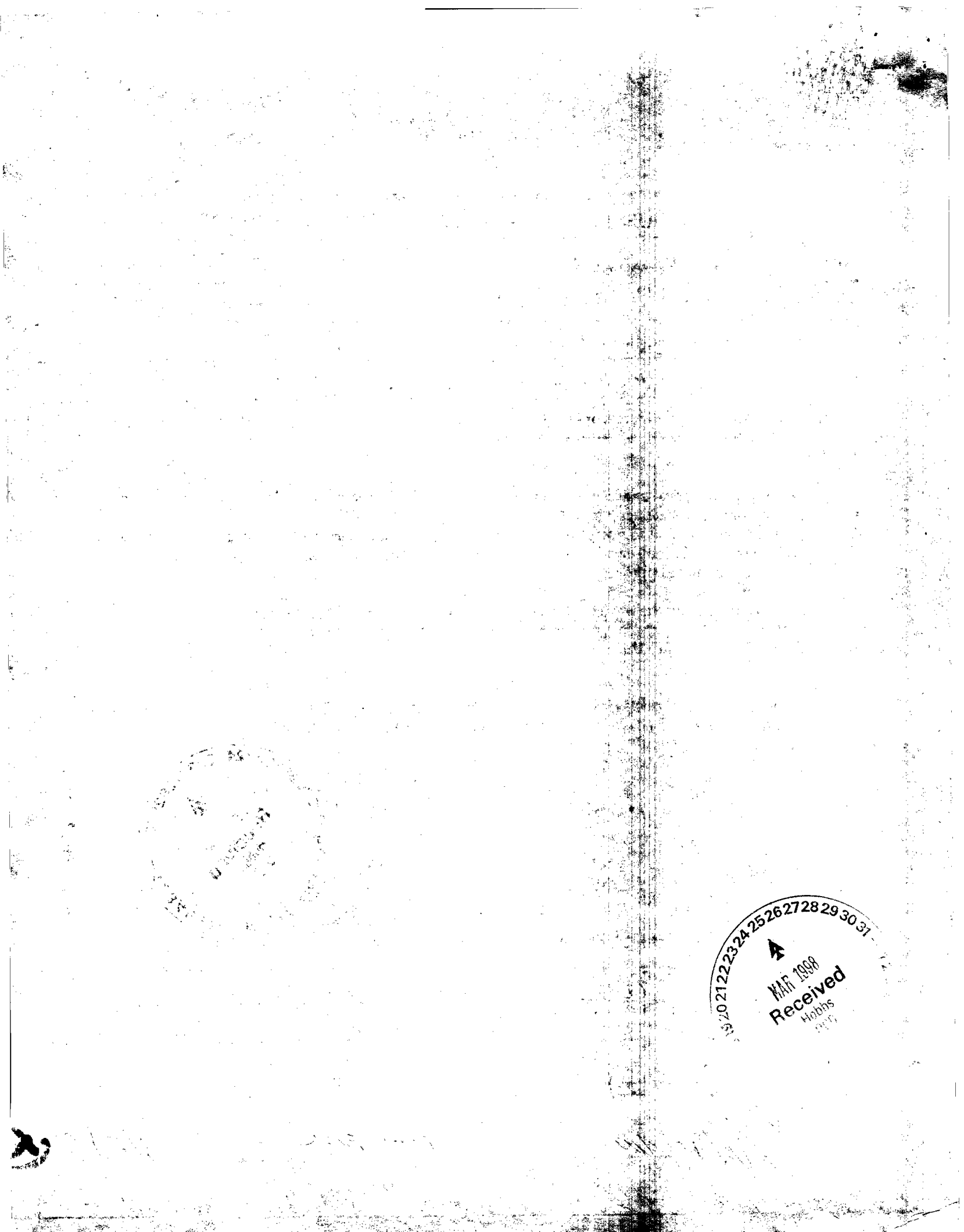
SIGNATURE: Billie Charo TITLE: Environmental Compliance Manager DATE: 03/24/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR DATE: 3/28/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 3/31/98


MAR 1998
Received
Hobbs

District I - (505) 393-6161
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Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to appropr
District O

MAR 1998
RECEIVED
OCD - ARTESIA

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter B & H
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E Main Street Artesia	New Mexico

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MAR 1998
Received
Hobbs
OCD

03-016

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(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR 3/30 DATE: 3/28/98

APPROVED BY: _____ TITLE: _____ DATE: _____

TELEPHONE
(505) 748-3311

EASYLINK
62905278

REFINING COMPANY

501 EAST MAIN STREET • P. O. BOX 159
ARTESIA, NEW MEXICO 88211-0159

FAX
(505) 746-6410 ACCTG
(505) 746-6155 EXEC
(505) 748-9077 ENGR
(505) 746-4438 P / L

March 20, 1998

Ken Marsh
CRI Inc.
P.O. Box 369
Hobbs, NM 88241

Dear Mr. Marsh:

I would like to get a few wastes generated at our Artesia and Lovington plants profiled into your facility. Below you will find a brief description along with the quantity of each waste generated. Enclosed are results from a TCLP analysis run by Trace Analysis Inc. and a Certificate of Waste Status for each non hazardous media

At our plant in Lovington, a crude oil tank (Tk 1201B) that had been out of service was sandblasted and repaired for future use. We now have approximately 100 yards of sand that we would like to send to your facility.

A recent asphalt spill inside the Lovington plant produced approximately 48 yards of an asphalt, dirt, and rock mixture. Asphalt has been approved in the past in both Artesia and Lovington, and since process has not changed, I would like to include it when we start transporting waste to your facility.

At our Artesia plant, isom feed from the naphtha splitter, located in the naphtha hydrotreater, is sent to the isom feed sulfur guard drums (D-41 and D-42). These drums are filled with a catalyst known as sulfur guard which absorbs any sulfur that may be present in the feed. Desulfurized feed is then sent to charge our isom unit. A change out of sulfur guard in D-42 resulted in the accumulation of 36 drums of catalyst. Before shipment, these drums will be transferred into 20 yard roll off bins.

Received
MAR 1998
Hobbs
OCD

In our Alkylation Unit, caustic in a neutralization pit is used to counter acid soluble oils that may have a low p.h. During this process, solids build up on the bottom of the pit and need to be cleaned out on a regular basis. We currently have approximately 700 barrels of sludge in frac tanks and will generate an average 120 barrels of sludge a week. We would like to send the already accumulated and future loads of this waste to your facility.

In our CCR Unit, hydrogen chloride is removed from reformate in a hydrogen chloride guard drum (D-342). This drum is filled with an absorbing catalyst called chloride guard. A recent change out of chloride guard resulted in the generation of 15 yards of spent catalyst that is now stored a 20 yard roll off bin.

At a crude holding station called Lynch, a leaking pump and a recent tank overflow generated approximately 30 yards of contaminated soil. This soil was cleaned up and is ready for disposal.

Tentatively scheduled, Ramirez Trucking will haul Tk 1201B blast sand and asphalt, Lea Land trucks will haul roll off bins filled with sulfur guard and chloride guard, I&W pumper trucks will transport neutralization pit sludge, and B&H Trucking will haul crude contaminated soil to your facility.

If you have any questions, please call me at (505) 748-3311. Thank you for your time in this matter.

Sincerely,

Bryan Madrid

Bryan Madrid
Environmental Specialist

Encl.

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING - LYNCH STATION

Sources: PETROLEUM REFINING - CRUDE CONTAMINATED SOIL

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING CO. concur with the status of the waste from the subject site.

Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 3/20/98

ent b

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

March 13, 1998
Receiving Date: 03/04/98
Sample Type: Soil
Project No: NA
Project Location: NA

Extraction Date: 03/08/98
Analysis Date: 03/09/98
Sampling Date: 03/03/98
Sample Condition: I & C
Sample Received by: BW
Project Name: NA

TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T92666/980824 Crude Cont. Soil	QC	RPD	%EA	%IA
Vinyl chloride	0.20	0.05	ND	111	4	117	111
1,1-Dichloroethene	0.70	0.05	ND	95	3	103	95
Methyl Ethyl Ketone	200.0	0.5	ND	106	3	105	106
Chloroform	6.00	0.05	ND	100	2	110	100
1,2-Dichloroethane	0.50	0.05	ND	101	4	110	101
Benzene	0.50	0.05	ND	105	0	111	105
Carbon Tetrachloride	0.50	0.05	ND	83	2	113	83
Trichloroethene	0.50	0.05	ND	98	0	104	98
Tetrachloroethene	0.70	0.05	ND	98	3	107	98
Chlorobenzene	100.00	0.05	ND	101	0	102	101
1,4-Dichlorobenzene	7.50	0.05	ND	100	1	104	100

SURROGATES	% Recovery
Dibromofluoromethane	100
Toluene-d8	96
4-Bromofluorobenzene	97

ND = Not Detected

METHODS: EPA SW 846-1311, 8260.
CHEMIST: AG

Received
MAR 1998
Hobbs
OCD

Director, Dr. Blair Leftwich

3-13-98
DATE

TRACEANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR NAVAJO REFINING

Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

March 13, 1998
Receiving Date: 03/04/98
Sample Type: Soil
Project No: NA
Project Location: NA

Extraction Date: 03/05/98
Analysis Date: 03/06/98
Sampling Date: 03/03/98
Sample Condition: Intact & Cool
Sample Received by: BW
Project Name: NA

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T92666/950824 Crude Cont. Soil	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	76	47**	34	85
1,4-Dichlorobenzene	7.5	0.05	ND	75	27**	46	84
o-Cresol	200.0	0.05	ND	71	23**	69	80
m,p-Cresol	200.0	0.05	ND	78	23**	120	97
Hexachloroethane	3.0	0.05	ND	76	30**	35	96
Nitrobenzene	2.0	0.05	ND	75	26**	78	94
Hexachlorobutadiene	0.5	0.05	ND	75	33**	35	94
2,4,6-Trichlorophenol	2.0	0.05	ND	73	25**	79	91
2,4,5-Trichlorophenol	400.0	0.05	ND	84	28**	79	105
2,4-Dinitrotoluene	0.13	0.05	ND	73	35**	87	91
2,4-D	10.0	0.05	ND	80	39**	70	100
Hexachlorobenzene	0.13	0.05	ND	76	26**	76	95
2,4,5-TP	1.0	0.05	ND	73	44**	1	91
Pentachlorophenol	100.0	0.05	ND	77	38**	68	96

Surrogates	% RECOVERY
2-Fluorophenol	41
Phenol-d5	28
Nitrobenzene-d5	70
2-Fluorobiphenyl	64
2,4,6-Tribromophenol	101
Terphenyl-d14	76

**NOTE: RPD out of range <20%.

ND - Not Detected

Methods: EPA SW 846-1311, 8270.
CHEMIST: MB

Director, Dr. Blair Leftwich

3-17-98
DATE

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL REPORT

CLIENT Navajo Refing CO.
501 E. Main
Artesia, NM 88211

SAMPLE NO. : 980824
INVOICE NO.: 22101770
REPORT DATE: 03-13-98
REVIEWED BY:
PAGE : 1 OF 1

CLIENT SAMPLE ID : Crude Cont. Soil
SAMPLE TYPE .....: Catalyst
SAMPLED BY .....: BM
SUBMITTED BY ....: BM
SAMPLE SOURCE ...: --

AUTHORIZED BY : B. Madrid
CLIENT P.O. : --
SAMPLE DATE ...: 03-03-98
SUBMITTAL DATE : 03-04-98
EXTRACTION DATE: --

TCLP Metals

D A T A T A B L E

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Arsenic (TCLP)	0.065	mg/L	0.050	03-10-98	SW846 7061	N. Munir
Barium (TCLP)	<5.0	mg/L	5.0	03-11-98	SW846 7080A	N. Munir
Cadmium (TCLP)	<0.25	mg/L	0.25	03-11-98	SW846 7130	N. Munir
Chromium (TCLP)	<0.50	mg/L	0.50	03-11-98	SW846 7190	N. Munir
Lead (TCLP)	<0.75	mg/L	0.75	03-11-98	SW846 7420	N. Munir
Mercury (TCLP)	<0.010	mg/L	0.010	03-06-98	SW846 7471A	N. Munir
Selenium (TCLP)	<0.050	mg/L	0.050	03-11-98	SW846 7741A	N. Munir
Silver (TCLP)	<0.25	mg/L	0.25	03-11-98	SW846 7760A	N. Munir

Received MAR 1998 Hobbs OCD

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ANALYTICAL RESULTS REPORTED HEREIN APPLY ONLY TO THE SAMPLE(S) TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY.

MANAGING DIRECTOR

03/13/98 16:23 FAX 007

TRACE ANALYSIS, INC.

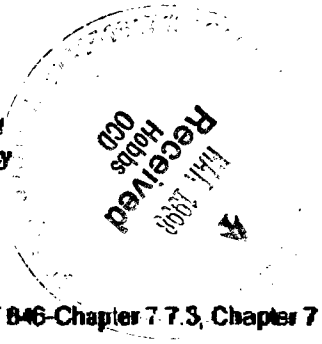
6721 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
2775 Ripley Avenue Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: info@traceanalysis.com

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

March 13, 1998
Receiving Date: 03/04/98
Sample Type: Soil
Project No: NA
Project Location: NA

Extraction Date: 03/05/98
Analysis Date: 03/05/98
Sampling Date: 03/03/98
Sample Condition: Intact & Cool
Sample Received by: BW
Project Name: NA

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	IGNITABILITY
	EPA LIMIT =	—	500	250	—	<2 >12.5	—
T98B67980824	Crude Cont. Soil	Non-reactive	<10	<2.5	Non-corrosive	8.1	Nonignitable
QC	Quality Control	—	—	—	—	7.0	—
RPD		0	0	0	0	0	0
% Extraction Accuracy		—	—	—	—	—	—
% Instrument Accuracy		—	—	—	—	100	—



METHODS: EPA SW 846-Chapter 7 7.3, Chapter 7 7.2, Chapter 7 7.1.
CHEMIST: RC

Director, Dr. Blair Leftwich

3-13-98
DATE

ent BY: TRACEANALYSIS; 8067941296; 13 Mar 98 2:43PM;Job 153;Page 1/6
n: TRACEANALYSIS EP At: 9155854944

TraceAnalysis, Inc.

6701 Aberdeen Avenue, Ste. 9 Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

LAB Order ID #

Company Name: NAVAJO REFINING CO. Phone #:

Address: 501 E. MAIN Fax #:

Contact Person: BRYAN MADRID

Invoice to: (If different from above)

Project #: Project Name:

Project Location: Sampler Signature: Bryan Madrid

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	CATALYST	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME
980823	D-342 CHLORIDE GUARD	1	1L					X				X	3/3/98	10:30
824	CRUDE CONT. SOIL	1	1L		X							X	3/3/98	12:15

ANALYSIS REQUEST (Circle or Specify Method No.)

MTBE 8020/602	BTEX 8020/602	TPH	PAH 8270	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	GC/MS Vol. 8240/8260/624	GC/MS Semi. Vol. 8270/625	PCB's 8080/608	Pest. 8080/608	BOD, TSS, PH						Turn Around Time If different from standard	Hold
					X	X	X	X												
					X	X	X	X												

Received at Hobbs 3-4-98 1000

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Bryan Madrid	3-3-98	16:15			
Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received at Laboratory by:	Date:	Time:
				3-4-98	10100

LAB USE ONLY
Intact Y N
Headspace Y N N/A
Temp 2 °C
Log-in Review

REMARKS:
349 2990 934

Carrier # FED-EX 349 2990 934

Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C.O.C.

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811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
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Environmental Bureau
Oil Conservation Division

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Ramirez Trucking
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E Main Street Artesia	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajo Refining Artesia facility. The material was generated by changing out the chloride guard. I have included a certificate of waste and a chain of custody.

Mailed to Hobbs 3/31/98

03-015

Estimated Volume 15 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo
Waste Management Facility Authorized Agent
TITLE: Environmental Compliance Manager DATE: 03/24/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env Engr DATE: 3/28/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 3/31/98

District I - (505) 393-6161
P. O. Box 1980
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New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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Originated 8/1

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to appropr
District Of

MAR 1998
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OCD - ARTESIA

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Ramirez Trucking
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RECEIVED
APR 06 1998
Environmental Bureau
Oil Conservation Division

03-015

MAR 1998
Received
Hobbs
OCD

Estimated Volume 15 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Environmental Compliance Manager DATE: 03/24/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR DATE: 3/28/98

APPROVED BY: _____ TITLE: _____ DATE: _____

TELEPHONE
(505) 748-3311

EASYLINK
62905278

Navajo REFINING COMPANY

501 EAST MAIN STREET • P. O. BOX 159
ARTESIA, NEW MEXICO 88211-0159

FAX
(505) 746-6410 ACCTG
(505) 746-6155 EXEC
(505) 748-9077 ENGR
(505) 746-4438 P / L

March 20, 1998

Ken Marsh
CRI Inc.
P.O. Box 369
Hobbs, NM 88241

Dear Mr. Marsh:

I would like to get a few wastes generated at our Artesia and Lovington plants profiled into your facility. Below you will find a brief description along with the quantity of each waste generated. Enclosed are results from a TCLP analysis run by Trace Analysis Inc. and a Certificate of Waste Status for each non hazardous media

At our plant in Lovington, a crude oil tank (Tk 1201B) that had been out of service was sandblasted and repaired for future use. We now have approximately 100 yards of sand that we would like to send to your facility.

A recent asphalt spill inside the Lovington plant produced approximately 48 yards of an asphalt, dirt, and rock mixture. Asphalt has been approved in the past in both Artesia and Lovington, and since process has not changed, I would like to include it when we start transporting waste to your facility.

At our Artesia plant, isom feed from the naphtha splitter, located in the naphtha hydrotreater, is sent to the isom feed sulfur guard drums (D-41 and D-42). These drums are filled with a catalyst known as sulfur guard which absorbs any sulfur that may be present in the feed. Desulfurized feed is then sent to charge our isom unit. A change out of sulfur guard in D-42 resulted in the accumulation of 36 drums of catalyst. Before shipment, these drums will be transferred into 20 yard roll off bins.

In our Alkylation Unit, caustic in a neutralization pit is used to counter acid soluble oils that may have a low p.h. During this process, solids build up on the bottom of the pit and need to be cleaned out on a regular basis. We currently have approximately 700 barrels of sludge in frac tanks and will generate an average 120 barrels of sludge a week. We would like to send the already accumulated and future loads of this waste to your facility. ?

In our CCR Unit, hydrogen chloride is removed from reformate in a hydrogen chloride guard drum (D-342). This drum is filled with an absorbing catalyst called chloride guard. A recent change out of chloride guard resulted in the generation of 15 yards of spent catalyst that is now stored a 20 yard roll off bin.

At a crude holding station called Lynch, a leaking pump and a recent tank overflow generated approximately 30 yards of contaminated soil. This soil was cleaned up and is ready for disposal.

Tentatively scheduled, Ramirez Trucking will haul Tk 1201B blast sand and asphalt, Lea Land trucks will haul roll off bins filled with sulfur guard and chloride guard, I&W pumper trucks will transport neutralization pit sludge, and B&H Trucking will haul crude contaminated soil to your facility.

If you have any questions, please call me at (505) 748-3311. Thank you for your time in this matter.

Sincerely,

Bryan Madrid

Bryan Madrid
Environmental Specialist

Encl.

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO.

Sources: PETROLEUM REFINING - CHLORIDE GUARD

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING CO. concur with the status of the waste from the subject site.

Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 3/20/98

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TRACEANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

March 13, 1998
Receiving Date: 03/04/98
Sample Type: Catalyst
Project No: NA
Project Location: NA

Extraction Date: 03/08/98
Analysis Date: 03/09/98
Sampling Date: 03/03/98
Sample Condition: I & C
Sample Received by: BW
Project Name: NA

TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T92665/980823 D-342	QC	RPD	%EA	%IA
Vinyl chloride	0.20	0.05	ND	111	4	117	111
1,1-Dichloroethene	0.70	0.05	ND	95	3	103	95
Methyl Ethyl Ketone	200.0	0.5	ND	109	3	105	106
Chloroform	6.00	0.05	ND	100	2	110	100
1,2-Dichloroethane	0.50	0.05	ND	101	4	110	101
Benzene	0.50	0.05	ND	105	0	111	105
Carbon Tetrachloride	0.50	0.05	ND	83	2	113	83
Trichloroethene	0.50	0.05	ND	98	0	104	98
Tetrachloroethene	0.70	0.05	ND	98	3	107	98
Chlorobenzene	100.00	0.05	ND	101	0	102	101
1,4-Dichlorobenzene	7.50	0.05	ND	100	1	104	100

SURROGATES	% Recovery
Dibromofluoromethane	100
Toluene-d8	96
4-Bromofluorobenzene	97

ND = Not Detected

METHODS: EPA SW 846-1311, 8260.
CHEMIST: AG

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Director, Dr. Blair Leftwich

3-13-98
DATE

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E Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR NAVAJO REFINING

Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

March 13, 1998
Receiving Date: 03/04/98
Sample Type: Catalyst
Project No: NA
Project Location: NA

Extraction Date: 03/05/98
Analysis Date: 03/06/98
Sampling Date: 03/03/98
Sample Condition: Intact & Cool
Sample Received by: BW
Project Name: NA

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T92665/980823 D-342	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	76	47**	34	96
1,4-Dichlorobenzene	7.5	0.05	ND	75	27**	46	94
o-Cresol	200.0	0.05	ND	71	23**	69	89
m,p-Cresol	200.0	0.05	ND	78	23**	120	97
Hexachloroethane	3.0	0.05	ND	76	30**	36	96
Nitrobenzene	2.0	0.05	ND	75	26**	78	94
Hexachlorobutadiene	0.5	0.05	ND	75	33**	36	94
2,4,6-Trichlorophenol	2.0	0.05	ND	73	25**	79	91
2,4,5-Trichlorophenol	400.0	0.05	ND	84	26**	79	105
2,4-Dinitrotoluene	0.13	0.05	ND	73	35**	87	91
2,4-D	10.0	0.05	ND	80	39**	70	100
Hexachlorobenzene	0.13	0.05	ND	76	26**	78	96
2,4,5-TP	1.0	0.05	ND	73	44**	1	91
Pentachlorophenol	100.0	0.05	ND	77	38**	68	96

Surrogates	% RECOVERY
2-Fluorophenol	50
Phenol-d6	36
Nitrobenzene-d5	74
2-Fluorobiphenyl	65
2,4,6-Tribromophenol	94
Terphenyl-d14	75

**NOTE: RPD out of range <20%.

ND - Not Detected

Methods: EPA SW 846-1311, 8270.
CHEMIST: MB

Director, Dr. Blair Leftwich

3-13-98
DATE

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Hobbs
OCD

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E-Mail: lab@traceanalysis.com

ANALYTICAL REPORT

CLIENT Navajo Refing CO.
501 E. Main
Artesia, NM 88211

SAMPLE NO. : 980823
INVOICE NO.: 22101770
REPORT DATE: 03-18-98
REVIEWED BY:
PAGE : 1 OF 1

CLIENT SAMPLE ID : D-342
SAMPLE TYPE .....: Catalyst
SAMPLED BY .....: BM
SUBMITTED BY ....: BM
SAMPLE SOURCE ...: --

AUTHORIZED BY : B. Madrid
CLIENT P.O. : --
SAMPLE DATE ...: 03-03-98
SUBMITTAL DATE : 03-04-98
EXTRACTION DATE: --

REMARKS -

Matrix spike and matrix spike duplicate were out of acceptance criteria range possibly due to matrix interference for the following parameter(s): Silver.

Received Mar 19 1998 OCD Hobbs

TCLP Metals

DATA TABLE

Parameter	Result	Unit	Detection Limit	Analysis Date	Test Method	Analyst
Arsenic (TCLP) .....:	<0.050	mg/L	0.050	03-10-98	SW846 7061	N. Munir
Barium (TCLP) .....:	<5.0	mg/L	5.0	03-11-98	SW846 7080A	N. Munir
Cadmium (TCLP) .....:	<0.25	mg/L	0.25	03-11-98	SW846 7130	N. Munir
Chromium (TCLP) .....:	<0.50	mg/L	0.50	03-11-98	SW846 7190	N. Munir
Lead (TCLP) .....:	<0.75	mg/L	0.75	03-11-98	SW846 7420	N. Munir
Mercury (TCLP) .....:	<0.010	mg/L	0.010	03-06-98	SW846 7471A	N. Munir
Selenium (TCLP) .....:	<0.050	mg/L	0.050	03-11-98	SW846 7741A	N. Munir
Silver (TCLP) .....:	<0.25	mg/L	0.25	03-11-98	SW846 7760A	N. Munir

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ANALYTICAL RESULTS REPORTED HEREIN APPLY ONLY TO THE SAMPLE(S) TESTED. FURTHERMORE, THIS REPORT CAN ONLY BE COPIED IN ITS ENTIRETY

MANAGING DIRECTOR

03/13/98 16:23 FAX 003

v: TRACEANALYSI8; 8067941298; 13 Mar 98 2:43PM;Job 153;Page 2/6
ent By: TRACEANALYSI8; 03/13/98 16:23 FAX

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4725 Bonny Avenue, Suite A El Paso, Texas 79922 915•585•3443 915•585•4944 FAX
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
NAVAJO REFINING

Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

March 13, 1998
Receiving Date: 03/04/98
Sample Type: Catalyst
Project No: NA
Project Location: NA

Extraction Date: 03/05/98
Analysis Date: 03/05/98
Sampling Date: 03/03/98
Sample Condition: Intact & Cool
Sample Received by: BW
Project Name: NA

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	IGNITABILITY
	EPA LIMIT =	—	500	250	—	<2 >12.5	—
T92865/980823	D-342	Non-reactive	40	5.0	Non-corrosive	10.7	Nonignitable
QC	Quality Control	—	—	—	—	7.0	—
RPD		0	0	0	0	0	0
% Extraction Accuracy		—	—	—	—	—	—
% Instrument Accuracy		—	—	—	—	100	—

Received
Hobbs, NM
MAR 13 1998

METHODS: EPA SW 846-Chapter 7.7.3, Chapter 7.7.2, Chapter 7.7.1.
CHEMIST: RC

Director, Dr. Blair Leftwich

3-13-98
DATE

TraceAnalysis, Inc.

6701 Aberdeen Avenue, Ste. 9 Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

LAB Order ID #

Company Name: NAVAJO REFINING CO. Phone #:

Address: 501 E. MAIN Fax #:

Contact Person: BRYAN MADRID

Invoice to: (If different from above)

Project #: Project Name:

Project Location: Sampler Signature: Bryan Madrid

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	CATALYST	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME
980823	D-342 CHLORIDE GUARD	1	1L					X				X	3/3/98	10:30
824	CRUDE CONT. SOIL	1	1L		X							X	3/3/98	12:15

ANALYSIS REQUEST (Circle or Specify Method No.)

MTBE 8020/602	BTEX 8020/602	TPH	PAH 8270	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	GC/MS Vol. 8240/8260/624	GC/MS Semi. Vol. 8270/625	PCB's 8080/608	Pest. 8080/608	BOD, TSS, PH	Turn Around Time if different from standard	Hold
					X	X	X	X							
					X	X	X	X							

Received by Hobbs OCD MAR 1998 4

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Bryan Madrid	3-3-98	16:15			
Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received at Laboratory by:	Date:	Time:
				3-4-98	10100

LAB USE ONLY
Intact Y N
Headspace Y N N/A
Temp 2 °C
Log-in Review

REMARKS:
349 2990 934

Carrier # FED-EX 349 2990 934

Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C.O.C.

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Environmental Bureau
Oil Conservation Division

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

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Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
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7. Location of Material (Street Address or ULSTR) 501 E Main Street Artesia	New Mexico

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BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajo Refining Artesia facility. The material was generated by by changing out the sulfer guard. I have included a certificate of waste and a chain of custody.

MAR 1998 Received Hobbs OCD

Mailed to Hobbs 3/31/98

03-013

Estimated Volume 36 drums cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo Waste Management Facility Authorized Agent TITLE: Environmental Compliance Manager DATE: 03/24/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Field Rep DATE: 3/28/98

APPROVED BY: _____ TITLE: Env. Geologist DATE: 3/31/98

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

MAR 1998
RECEIVED
OCD - ARTESIA

Form C-1
Originated 8/1

Submit Orig
Plus 1 C
to appropr
District Of

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Lea Land Trucks
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E Main Street Artesia	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajo Refining Artesia facility. The material was generated by by changing out the sulfer guard. I have included a certificate of waste and a chain of custody.

MAR 1998
Received
Hobbs
OCD

03-013

Estimated Volume 36 drums cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo Waste Management Facility Authorized Agent TITLE: Environmental Compliance Manager DATE: 03/24/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Field Rep II 3/30 DATE: 3/28/98

APPROVED BY: _____ TITLE: _____ DATE: _____

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
APR 1 0 1998
Environmental Bureau
Oil Conservation Division

Form C-1
Originated 8/1

Submit Orig
Plus 1 C
to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Lovington Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Ramirez Trucking
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 5 miles south of Lovington	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajo Refining Lovington facility. The material was generated by sandblasting of Tk 1201 B. I have included a certificate of waste and a chain of custody.

APR 1998 Received Hobbs OCD

Printed in Hobbs 9/10/98

03-011

Estimated Volume 100 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Environmental Compliance Manager DATE: 03/24/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Field Rep DATE: 9/8/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 9/10/98 (4 mjk)

TELEPHONE
(505) 748-3311

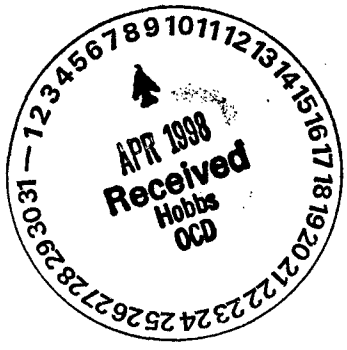
EASYLINK
62905278

NAVAJO REFINING COMPANY

501 EAST MAIN STREET • P. O. BOX 159
ARTESIA, NEW MEXICO 88211-0159

FAX
(505) 746-6410 ACCTG
(505) 746-6155 EXEC
(505) 748-9077 ENGR
(505) 746-4438 P / L

March 20, 1998



Ken Marsh
CRI Inc.
P.O. Box 369
Hobbs, NM 88241

Dear Mr. Marsh:

I would like to get a few wastes generated at our Artesia and Lovington plants profiled into your facility. Below you will find a brief description along with the quantity of each waste generated. Enclosed are results from a TCLP analysis run by Trace Analysis Inc. and a Certificate of Waste Status for each non hazardous media

At our plant in Lovington, a crude oil tank (Tk 1201B) that had been out of service was sandblasted and repaired for future use. We now have approximately 100 yards of sand that we would like to send to your facility.

A recent asphalt spill inside the Lovington plant produced approximately 48 yards of an asphalt, dirt, and rock mixture. Asphalt has been approved in the past in both Artesia and Lovington, and since process has not changed, I would like to include it when we start transporting waste to your facility.

At our Artesia plant, isom feed from the naphtha splitter, located in the naphtha hydrotreater, is sent to the isom feed sulfur guard drums (D-41 and D-42). These drums are filled with a catalyst known as sulfur guard which absorbs any sulfur that may be present in the feed. Desulfurized feed is then sent to charge our isom unit. A change out of sulfur guard in D-42 resulted in the accumulation of 36 drums of catalyst. Before shipment, these drums will be transferred into 20 yard roll off bins.

In our Alkylation Unit, caustic in a neutralization pit is used to counter acid soluble oils that may have a low p.h. During this process, solids build up on the bottom of the pit and need to be cleaned out on a regular basis. We currently have approximately 700 barrels of sludge in frac tanks and will generate an average 120 barrels of sludge a week. We would like to send the already accumulated and future loads of this waste to your facility.

In our CCR Unit, hydrogen chloride is removed from reformate in a hydrogen chloride guard drum (D-342). This drum is filled with an absorbing catalyst called chloride guard. A recent change out of chloride guard resulted in the generation of 15 yards of spent catalyst that is now stored a 20 yard roll off bin.

At a crude holding station called Lynch, a leaking pump and a recent tank overflow generated approximately 30 yards of contaminated soil. This soil was cleaned up and is ready for disposal.

Tentatively scheduled, Ramirez Trucking will haul Tk 1201B blast sand and asphalt, Lea Land trucks will haul roll off bins filled with sulfur guard and chloride guard, I&W pumper trucks will transport neutralization pit sludge, and B&H Trucking will haul crude contaminated soil to your facility.

If you have any questions, please call me at (505) 748-3311. Thank you for your time in this matter.

Sincerely,

Bryan Madrid

Bryan Madrid
Environmental Specialist

Encl.

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: LEA REFINING CO.

Sources: PETROLEUM REFINING - BLAST SAND

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING CO. concur with the status of the waste from the subject site.

Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 3/20/98

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

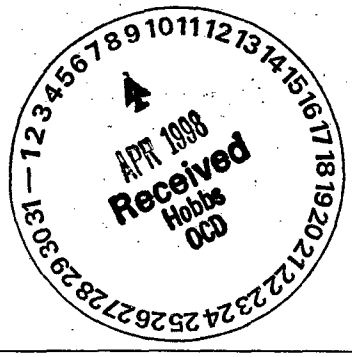
ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Feb 17, 1998
Date Rec: 2/9/98
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9802000140
Sampling Date: 2/6/98
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Vol in Soil (mg/L)	EPA Limit	Reporting Limit	Method Blank	T90567 1201-B Sand	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	111	3	70	111
1,1-Dichloroethene	0.7	0.05	ND	ND	100	1	90	100
Methyl Ethyl Ketone	200.0	0.50	ND	ND	87	16	89	87
Chloroform	6.0	0.05	ND	ND	94	4	106	94
1,2-Dichloroethane	0.5	0.05	ND	ND	88	6	106	88
Benzene	0.5	0.05	ND	ND	99	5	101	99
Carbon Tetrachloride	0.5	0.05	ND	ND	90	1	115	90
Trichloroethene	0.5	0.05	ND	ND	99	1	99	99
Tetrachloroethane	0.7	0.05	ND	ND	96	3	97	96
Chlorobenzene	100.0	0.05	ND	ND	99	5	95	99
1,4-Dichlorobenzene	7.5	0.05	ND	ND	99	3	97	99

	% RECOVERY
Dibromofluoromethane	107
Toluene-d8	101
4-Bromofluorobenzene	102



TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	2/10/98	EPA 8260	2/11/98	AG	100 ea	100 ea

Director, Dr. Blair Leftwich

2-17-98
Date

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

February 27, 1998
Receiving Date: 02/09/98
Sample Type: Sand
Project No: NA
Project Location: NA

Extraction Date: 02/11/98
Analysis Date: 02/17/98
Sampling Date: 02/06/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T90567 1201-B Sand	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	82	44*	5	103
1,4-Dichlorobenzene	7.5	0.05	ND	77	4	23	96
o-Cresol	200.0	0.05	ND	78	10	41	98
m,p-Cresol	200.0	0.05	ND	81	12	76	101
Hexachloroethane	3.0	0.05	ND	79	13	24	99
Nitrobenzene	2.0	0.05	ND	78	2	48	98
Hexachlorobutadiene	0.5	0.05	ND	77	24*	28	96
2,4,6-Trichlorophenol	2.0	0.05	ND	80	12	43	100
2,4,5-Trichlorophenol	400.0	0.05	ND	83	15	42	104
2,4-Dinitrotoluene	0.13	0.05	ND	84	18	53	105
2,4-D	10.0	0.05	ND	77	17	145	96
Hexachlorobenzene	0.13	0.05	ND	81	13	66	101
2,4,5-TP	1.0	0.05	ND	76	12	166	95
Pentachlorophenol	100.0	0.05	ND	85	25*	67	106

Surrogates	% RECOVERY	
2-Fluorophenol	34	
Phenol-d6	20**	(24-113)
Nitrobenzene-d5	74	
2-Fluorobiphenyl	50	
2,4,6-Tribromophenol	71	
Terphenyl-d14	95	

*NOTE: RPD out of range <20%.
**NOTE: Surrogate recovery out of range due to matrix and dilution.

ND - Not Detected

Methods: EPA SW 846-1311, 8270.
CHEMIST: MB

Director, Dr. Blair Leftwich

2-27-98
DATE

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

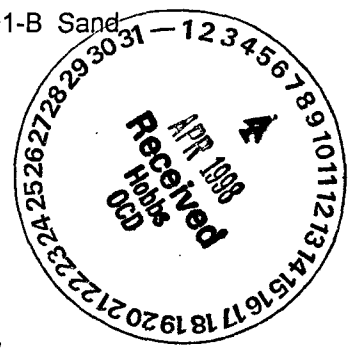
February 27, 1998
Receiving Date: 02/09/98
Sample Type: Sand
Project No: NA
Project Location: NA

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

Extraction Date: 02/09/98
Analysis Date: 02/10/98
Sampling Date: 02/06/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cd	Cr	Pb	Ag	Ba	Hg
	EPA LIMIT =	5.0	1.0	1.0	5.0	5.0	5.0	100.0	0.20
T90567	1201-B Sand	<0.50	<0.50	<0.10	<0.50	4.9	<0.10	1.2	<0.010
ICV		0.98	1.0	0.96	0.98	0.96	0.19	0.92	0.053
CCV		1.0	1.1	0.98	1.0	1.0	0.20	1.0	0.052
Reporting Limit		0.50	0.50	0.10	0.50	0.50	0.10	0.50	0.010
RPD		1	1	1	1	0	8	1	0
% Extraction Accuracy		105	105	100	100	98	117	95	110
% Instrument Accuracy		99	105	97	99	98	95	94	105



CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba: RR Hg: HC
METHODS: EPA SW 846-1311, 6010B, 7470.
TCLP METALS SPIKE: 20 mg/L As, Se, Cd, Cr, Pb, Ba; 5.0 mg/L Ag; 0.050 mg/L Hg.
TCLP METALS CV: 1.0 mg/L As, Se, Cd, Cr, Pb, Ba; 0.20 mg/L Ag; 0.050 mg/L Hg.

Director, Dr. Blair Leftwich

2-27-98
Date

TRACE ANALYSIS, INC.

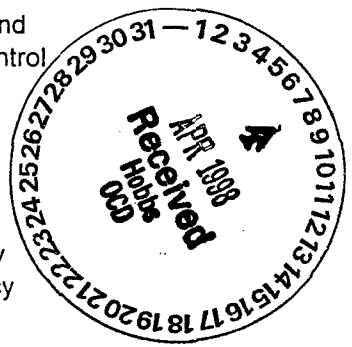
6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

February 27, 1998
Receiving Date: 02/09/98
Sample Type: Sand
Project No: NA
Project Location: NA

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

Extraction Date: 02/10/98
Analysis Date: 02/10/98
Sampling Date: 02/06/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY ---	pH (s.u.)	IGNITABILITY
	EPA LIMIT =	---	500	250	---	<2 >12.5	---
T90567	1201-B Sand	Non-reactive	10	2.5	Non-corrosive	6.3	Nonignitable
QC	Quality Control	---	---	---	---	8.0	---
RPD		0	0	0	0	0	0
% Extraction Accuracy		---	---	---	---	---	---
% Instrument Accuracy		---	---	---	---	100	---



METHODS: EPA SW 846-Chapter 7 7.3, Chapter 7 7.2, Chapter 7 7.1.
CHEMIST: JG

Director, Dr. Blair Leftwich

2-27-98
DATE

90567-69

TraceAnalysis, Inc.

6701 Aberdeen Avenue, Ste. 9 Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

LAB Order ID # 140141

Company Name: NAVAJO REFINING CO. Phone #:
Address: 501 E. MAIN Fax #:
Contact Person: BRYAN MADRID
Invoice to: (If different from above)
Project #: Project Name:
Project Location: Sampler Signature: Bryan Madrid

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME
90567	1201-B SAND	1	1L		SAND						X	2/6/98	14:15
68	TAIL GAS UNIT	1	1L		X						X	2/6/98	15:00
69	TANK 8	1	1L				X				X	2/6/98	15:10

ANALYSIS REQUEST (Circle or Specify Method No.)

MTBE 8020/602	BTEX 8020/602	TPH	PAH 8270	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	GC.MS Vol. 8240/8260/624	GC/MS Semi. Vol. 8270/625	PCB's 8080/608	Pest. 8080/608	BOD, TSS, PH	Tetra Pb *				Turn Around Time if different from standard	Hold
					X	X	X	X						X					
					X	X	X	X											
					X	X	X	X						X					

Relinquished by: Bryan Madrid Date: 2/6/98 Time: 16:15
Received by: Date: Time:
Relinquished by: Date: Time:
Received by: Date: Time:
Relinquished by: Date: Time:
Received at Laboratory by: Vicki Wrather Date: 2-9-98 Time: 10:00AM

Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C.O.C.

Received APR 1998 Hobbs OCD

LAB USE ONLY
Intact (Y) N
Headspace Y / N
Temp 5 ° °
Log-in Review DNG.

REMARKS:
* We want to know if tetra-ethyl-lead is present.
2-27
3-4

Carrier # FedEx 348 9216 753

ARTESIA, NEW MEXICO 88210
PHONE: (505) 748-3311

ENGINEERING DEPARTMENT
FAX: (505) 748-9077

NAVAJO REFINING COMPANY
P.O. BOX 159
501 E. MAIN STREET

SENDING TO: NAME: BILLIE CHARO

ORGANIZATION/FIRM: CRI

FAX #: (505) 393 - 3615

SENDING FROM: NAME: BRYAN MADRID

DATE: 4/6/98 NO. OF PAGES: 2

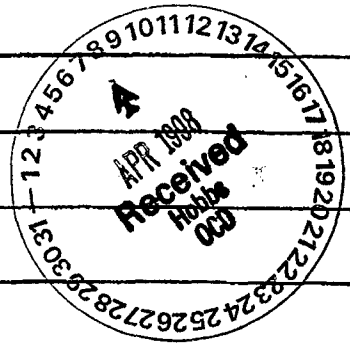
IF YOU DO NOT RECEIVE ALL PAGES, PLEASE CALL LISA AT EXT. 270

BILLIE,

HERE ARE THE RESULTS FOR THE 1201-B SAND RESUBMITTAL. A HARD COPY WILL FOLLOW IN THE MAIL.

THANKS,

BRYAN



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TRACE ANALYSIS, INC.
6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800-378-1296 806-794-1296 FAX 806-794-1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888-588-3443 915-585-3443 FAX 915-585-4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

April 01, 1998
Receiving Date: 02/09/98
Sample Type: Sand
Project No. NA
Project Location: NA

Extraction Date: 03/30/98
Analysis Date: 03/31/98
Sampling Date: 02/06/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TA#	FIELD CODE	TCLP Pb (mg/L)
	EPA LIMIT =	5.0
T90587	1201-B Sand	<0.10
ICV		0.96
CCV		0.97
REPORTING LIMIT		0.10
RPD		0
% Extraction Accuracy		85
% Instrument Accuracy		96

METHODS: EPA SW 846-1311, 6010B.
CHEMIST: RR
TCLP Pb SPIKE: 2.0 mg/L TCLP Pb.
TCLP Pb CV: 1.0 mg/L TCLP Pb.

APR 1998 Received Hobbs OCD

Director, Dr. Blair Leftwich

4-1-98
DATE

TELEPHONE
(505) 748-3311

EASYLINK
62905278

Navajo REFINING COMPANY

501 EAST MAIN STREET • P. O. BOX 159
ARTESIA, NEW MEXICO 88211-0159

FAX
(505) 746-6410 ACCTG
(505) 746-6155 EXEC
(505) 748-9077 ENGR
(505) 746-4438 P / L

March 20, 1998

Ken Marsh
CRI Inc.
P.O. Box 369
Hobbs, NM 88241

Dear Mr. Marsh:

I would like to get a few wastes generated at our Artesia and Lovington plants profiled into your facility. Below you will find a brief description along with the quantity of each waste generated. Enclosed are results from a TCLP analysis run by Trace Analysis Inc. and a Certificate of Waste Status for each non hazardous media

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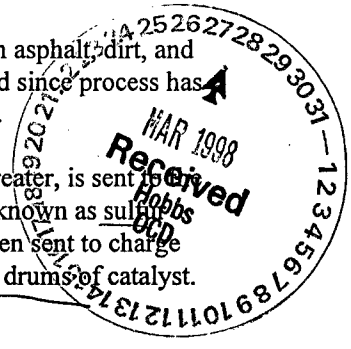

At our Artesia plant, isom feed from the naphtha splitter, located in the naphtha hydrotreater, is sent to the isom feed sulfur guard drums (D-41 and D-42). These drums are filled with a catalyst known as sulfur guard which absorbs any sulfur that may be present in the feed. Desulfurized feed is then sent to charge our isom unit. A change out of sulfur guard in D-42 resulted in the accumulation of 36 drums of catalyst. Before shipment, these drums will be transferred into 20 yard roll off bins.

In our Alkylation Unit, caustic in a neutralization pit is used to counter acid soluble oils that may have a low p.h. During this process, solids build up on the bottom of the pit and need to be cleaned out on a regular basis. We currently have approximately 700 barrels of sludge in frac tanks and will generate an average 120 barrels of sludge a week. We would like to send the already accumulated and future loads of this waste to your facility.

In our CCR Unit, hydrogen chloride is removed from reformate in a hydrogen chloride guard drum (D-342). This drum is filled with an absorbing catalyst called chloride guard. A recent change out of chloride guard resulted in the generation of 15 yards of spent catalyst that is now stored a 20 yard roll off bin.

At a crude holding station called Lynch, a leaking pump and a recent tank overflow generated approximately 30 yards of contaminated soil. This soil was cleaned up and is ready for disposal.

Tentatively scheduled, Ramirez Trucking will haul Tk 1201B blast sand and asphalt, Lea Land trucks will haul roll off bins filled with sulfur guard and chloride guard, I&W pumper trucks will transport neutralization pit sludge, and B&H Trucking will haul crude contaminated soil to your facility.

MAR 1998
Received
Hobbs
OCD

If you have any questions, please call me at (505) 748-3311. Thank you for your time in this matter.

Sincerely,

Bryan Madrid

Bryan Madrid
Environmental Specialist

Encl.

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO.

Sources: PETROLEUM REFINING - SULFUR GUARD

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING CO. concur with the status of the waste from the subject site.

Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 3/20/98

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Feb 23, 1998
Date Rec: 2/18/98
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9802000327
Sampling Date: 2/17/98
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Vol in Solid (mg/L)	EPA Limit	Reporting Limit	Method Blank	T91382 D-42	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	115	11	78	115
1,1-Dichloroethene	0.7	0.05	ND	ND	95	5	82	95
Methyl Ethyl Ketone	200.0	0.50	ND	ND	102	4	112	102
Chloroform	6.0	0.05	ND	ND	96	5	106	96
1,2-Dichloroethane	0.5	0.05	ND	ND	95	6	114	95
Benzene	0.5	0.05	ND	ND	104	6	104	104
Carbon Tetrachloride	0.5	0.05	ND	ND	84	1	117	84
Trichloroethene	0.5	0.05	ND	ND	98	4	95	98
Tetrachloroethane	0.7	0.05	ND	ND	96	4	97	96
Chlorobenzene	100.0	0.05	ND	ND	99	5	100	99
1,4-Dichlorobenzene	7.5	0.05	ND	0.05	101	3	95	101

	% RECOVERY
Dibromofluoromethane	109
Toluene-d8	98
4-Bromofluorobenzene	101

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	2/20/98	EPA 8260	2/22/98	AG	100 ea	100 ea

Director, Dr. Blair Leftwich

2-23-98
Date

TRACEANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
NAVAJO REFINING CO.
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

February 27, 1998
Receiving Date: 02/18/98
Sample Type: Catalyst
Project No: NA
Project Location: NA

Extraction Date: 02/20/98
Analysis Date: 02/21/98
Sampling Date: 02/17/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T91382 D-42	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	86	0	24	108
1,4-Dichlorobenzene	7.5	0.05	ND	84	2	43	105
o-Cresol	200.0	0.05	ND	73	2	45	91
m,p-Cresol	200.0	0.05	ND	82	2	80	102
Hexachloroethane	3.0	0.05	ND	78	2	41	98
Nitrobenzene	2.0	0.05	ND	80	2	52	100
Hexachlorobutadiene	0.5	0.05	ND	81	2	48	101
2,4,6-Trichlorophenol	2.0	0.05	ND	81	11	47	101
2,4,5-Trichlorophenol	400.0	0.05	ND	82	4	45	102
2,4-Dinitrotoluene	0.13	0.05	ND	83	12	52	104
2,4-D	10.0	0.05	ND	76	15	139	95
Hexachlorobenzene	0.13	0.05	ND	84	4	100	105
2,4,5-TP	1.0	0.05	ND	85	17	190	106
Pentachlorophenol	100.0	0.05	ND	72	3	74	90

Surrogates	**% RECOVERY**
2-Fluorophenol	28
Phenol-d6	19
Nitrobenzene-d5	52
2-Fluorobiphenyl	44
2,4,6-Tribromophenol	44
Terphenyl-d14	91

ND - Not Detected

Methods: EPA SW 846-1311, 8270.
CHEMIST: MB/JT

Director, Dr. Blair Leftwich

2-27-98
DATE

TRACE ANALYSIS, INC.

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4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

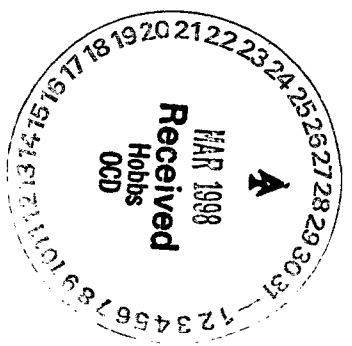
February 27, 1998
Receiving Date: 02/18/98
Sample Type: Catalyst
Project No: NA
Project Location: NA

ANALYTICAL RESULTS FOR
NAVAJO REFINING CO.
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

Extraction Date: 02/21/98
Analysis Date: 02/24/98
Sampling Date: 02/17/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cd	Cr	Pb	Ag	Ba	Hg
	EPA LIMIT =	5.0	1.0	1.0	5.0	5.0	5.0	100.0	0.20
T91382	D-42	<1.0	<1.0	<0.5	<0.5	<1.0	<0.5	<1.0	<0.010
ICV		1.1	1.0	1.0	1.0	1.0	0.20	1.0	0.053
CCV		1.1	1.1	1.0	1.0	1.1	0.20	0.98	0.049
Reporting Limit		1.0	1.0	0.5	0.5	1.0	0.5	1.0	0.010
RPD		8	13	4	0	9	6	4	0
% Extraction Accuracy		125	113	112	110	110	87	118	106
% Instrument Accuracy		110	105	100	100	105	100	99	102



CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba: RR Hg: HC
METHODS: EPA SW 846-1311, 6010B, 7470.
TCLP METALS SPIKE: 2.0 mg/L As, Se, Cd, Cr, Pb, Ba, Ag; 0.050 mg/L Hg.
TCLP METALS CV: 1.0 mg/L As, Se, Cd, Cr, Pb, Ba; 0.20 mg/L Ag; 0.050 mg/L Hg.

Director, Dr. Blair Leftwich

2-27-98
Date

TRACE ANALYSIS, INC.

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4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

February 27, 1998
Receiving Date: 02/18/98
Sample Type: Catalyst
Project No: NA
Project Location: NA

ANALYTICAL RESULTS FOR
NAVAJO REFINING CO.
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

Extraction Date: 02/20/98
Analysis Date: 02/20/98
Sampling Date: 02/17/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	IGNITABILITY
	EPA LIMIT =	---	500	250	---	<2 >12.5	---
T91382	D-42	Non-reactive	<10	<2.5	Non-corrosive	7.0	Non-ignitable
QC	Quality Control	---	---	---	---	8.0	---
RPD		0	0	0	0	0	0
% Extraction Accuracy		---	---	---	---	---	---
% Instrument Accuracy		---	---	---	---	100	---

METHODS: EPA SW 846-Chapter 7 7.3, Chapter 7 7.2, Chapter 7 7.1.
CHEMIST: RC

Director, Dr. Blair Leftwich

Received
Hobbs OCD
MAR 1998
2 27 - 98
DATE

91382

TraceAnalysis, Inc.

6701 Aberdeen Avenue, Ste. 9 Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

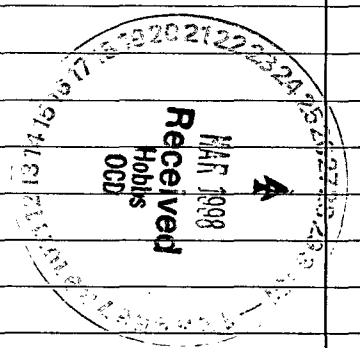
LAB Order ID # 327

Company Name: NAVAJO REFINING CO. Phone #: 505 748 3311
Address: 501 E. MAIN Fax #:
Contact Person: BRYAN MADRID
Invoice to: (If different from above)
Project #: Project Name:
Project Location: Sampler Signature: Bryan Madrid

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	CATALYST	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME
91382	D-42	1	1L					X				X	2/17/98	10:30

ANALYSIS REQUEST (Circle or Specify Method No.)

MTBE 8020/602	BTEX 8020/602	TPH	PAH 8270	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	GC.MS Vol. 8240/8260/624	GC/MS Semi. Vol. 8270/625	PCB's 8080/608	Pest. 8080/608	BOD, TSS, PH						Turn Around Time if different from standard	Hold
					X	X	X	X												



Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Bryan Madrid	2/17/98	16:15			
			Received at Laboratory by: Vicki Wyndham	Date: 2-18-98	Time: 10:25 AM

Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C.O.C.

LAB USE ONLY

Intact (Y) N
Headspace Y / N
Temp -2 °
Log-in Review

REMARKS:
no pest per Bryan M.
2/19/98 9:43

Carrier # FedEx 349 0582 496

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-1
Originated 8/1

Submit Orig
Plus 1 C
to appropr
District Of

RECEIVED
MAR 31 1998
Environmental Bureau
Oil Conservation Division

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter I & W
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E Main Street Artesia	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajo Refining Artesia facility. The material was generated by cleaning the neutrilization pit. I have included a certificate of waste and a chain of custody.

MAR 1998 Received Hobbs OCD

Mailed to Hobbs 3/31/98

03-014

Estimated Volume 700 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo Waste Management Facility Authorized Agent TITLE: Environmental Compliance Manager DATE: 03/24/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR DATE: 3/28/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 3/31/98

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-1
Originated 8/1

Submit Orig
Plus 1 C
to appropr
District Of

MAR 1998
RECEIVED
OCD
ARTESIA

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter I & W
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E Main Street Artesia	New Mexico

9. Circle One:

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All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

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MAR 1998
Received
Hobbs
OCD

03-014

Estimated Volume 700 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: _____ TITLE: Environmental Compliance Manager DATE: 03/24/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR FW 3/30 DATE: 3/28/98

APPROVED BY: _____ TITLE: _____ DATE: _____

TELEPHONE
(505) 748-3311

EASYLINK
62905278

NAVAJO REFINING COMPANY

501 EAST MAIN STREET • P. O. BOX 159
ARTESIA, NEW MEXICO 88211-0159

FAX
(505) 746-6410 ACCTG
(505) 746-6155 EXEC
(505) 748-9077 ENGR
(505) 746-4438 P / L

March 20, 1998

Ken Marsh
CRI Inc.
P.O. Box 369
Hobbs, NM 88241

Dear Mr. Marsh:

I would like to get a few wastes generated at our Artesia and Lovington plants profiled into your facility. Below you will find a brief description along with the quantity of each waste generated. Enclosed are results from a TCLP analysis run by Trace Analysis Inc. and a Certificate of Waste Status for each non hazardous media

At our plant in Lovington, a crude oil tank (Tk 1201B) that had been out of service was sandblasted and repaired for future use. We now have approximately 100 yards of sand that we would like to send to your facility.

A recent asphalt spill inside the Lovington plant produced approximately 48 yards of an asphalt, dirt, and rock mixture. Asphalt has been approved in the past in both Artesia and Lovington, and since process has not changed, I would like to include it when we start transporting waste to your facility.

At our Artesia plant, isom feed from the naphtha splitter, located in the naphtha hydrotreater, is sent to the isom feed sulfur guard drums (D-41 and D-42). These drums are filled with a catalyst known as sulfur guard which absorbs any sulfur that may be present in the feed. Desulfurized feed is then sent to charge our isom unit. A change out of sulfur guard in D-42 resulted in the accumulation of 36 drums of catalyst. Before shipment, these drums will be transferred into 20 yard roll off bins.

In our Alkylation Unit, caustic in a neutralization pit is used to counter acid soluble oils that may have a low p.h. During this process, solids build up on the bottom of the pit and need to be cleaned out on a regular basis. We currently have approximately 700 barrels of sludge in frac tanks and will generate an average 120 barrels of sludge a week. We would like to send the already accumulated and future loads of this waste to your facility.

In our CCR Unit, hydrogen chloride is removed from reformate in a hydrogen chloride guard drum (D-342). This drum is filled with an absorbing catalyst called chloride guard. A recent change out of chloride guard resulted in the generation of 15 yards of spent catalyst that is now stored a 20 yard roll off bin.

At a crude holding station called Lynch, a leaking pump and a recent tank overflow generated approximately 30 yards of contaminated soil. This soil was cleaned up and is ready for disposal.

Tentatively scheduled, Ramirez Trucking will haul Tk 1201B blast sand and asphalt, Lea Land trucks will haul roll off bins filled with sulfur guard and chloride guard, I&W pumper trucks will transport neutralization pit sludge, and B&H Trucking will haul crude contaminated soil to your facility.

If you have any questions, please call me at (505) 748-3311. Thank you for your time in this matter.

Sincerely,

Bryan Madrid

Bryan Madrid
Environmental Specialist

Encl.

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO.

Sources: PETROLEUM REFINING - NEUTRALIZATION PIT SLUDGE

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING CO. concur with the status of the waste from the subject site.

Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 3/20/98

TRACE ANALYSIS, INC.

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4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

March 03, 1998
Receiving Date: 02/04/98
Sample Type: Sludge
Project No: NA
Project Location: NA

Extraction Date: 02/09/98
Analysis Date: 02/11/98
Sampling Date: 02/02/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T90349 Neutralization Pit	QC	RPD	%EA	%IA
Vinyl chloride	0.20	0.001	ND	111	3	71	111
1,1-Dichloroethene	0.70	0.001	ND	100	1	90	100
Methyl Ethyl Ketone	200.0	0.010	ND	87	16	97	87
Chloroform	6.00	0.001	ND	94	3	108	94
1,2-Dichloroethane	0.50	0.001	ND	88	5	109	88
Benzene	0.50	0.001	ND	99	5	104	99
Carbon Tetrachloride	0.50	0.001	ND	90	1	116	90
Trichloroethene	0.50	0.001	ND	99	2	100	99
Tetrachloroethene	0.70	0.001	ND	96	4	99	96
Chlorobenzene	100.00	0.001	ND	99	5	98	99
1,4-Dichlorobenzene	7.50	0.001	ND	99	3	99	99

SURROGATES	**% Recovery**
Dibromofluoromethane	108
Toluene-d8	103
4-Bromofluorobenzene	101

ND = Not Detected

METHODS: EPA SW 846-1311, 8260.
CHEMIST: AG

Director, Dr. Blair Leftwich

3-3-98
DATE

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

March 05, 1998
Receiving Date: 02/04/98
Sample Type: Sludge
Project No: NA
Project Location: NA

Extraction Date: 02/06/98
Analysis Date: 02/24/98
Sampling Date: 02/02/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit***	T90349 Neutralization Pit	QC	RPD	%EA	%IA
Pyridine	5.0	0.5	ND	76	11	38	96
1,4-Dichlorobenzene	7.5	0.5	ND	81	22*	50	101
o-Cresol	200.0	0.5	ND	81	19	56	102
m,p-Cresol	200.0	0.5	ND	87	16	107	110
Hexachloroethane	3.0	0.5	ND	82	28*	48	103
Nitrobenzene	2.0	0.5	ND	82	25*	65	103
Hexachlorobutadiene	0.5	0.5	ND	81	25*	62	102
2,4,6-Trichlorophenol	2.0	0.5	ND	78	22*	71	98
2,4,5-Trichlorophenol	400.0	0.5	ND	79	22*	65	99
2,4-Dinitrotoluene	0.13	0.5	ND	84	14	76	105
2,4-D	10.0	0.5	ND	79	8	177	99
Hexachlorobenzene	0.13	0.5	ND	82	8	112	103
2,4,5-TP	1.0	0.5	ND	70	0	208	88
Pentachlorophenol	100.0	0.5	ND	78	0	79	98

Surrogates	**% RECOVERY**	
2-Fluorophenol	28	
Phenol-d6	41	
Nitrobenzene-d5	46	
2-Fluorobiphenyl	32**	**(43-116)**
2,4,6-Tribromophenol	18	
Terphenyl-d14	47	

***NOTE: RPD is above accepted limits of <20%.**
****NOTE: Surrogate Recovery is out of accpetable limits of 43-116%.**
*****NOTE: Elevated reporting limits due to matrix effect.**

ND - Not Detected

Methods: EPA SW 846-1311, 8270.
CHEMIST: JT/MB

Director, Dr. Blair Leftwich

3-5-98
DATE

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

March 02, 1998
Receiving Date: 02/04/98
Sample Type: Sludge
Project No: NA
Project Location: NA

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

Extraction Date: 02/05/98
Analysis Date: 02/06/98
Sampling Date: 02/02/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cd	Cr	Pb	Ag	Ba	Hg
	EPA LIMIT =	5.0	1.0	1.0	5.0	5.0	5.0	100.0	0.20
T90349	Neutralization Pit	<5.0	<0.50	<1.0	<5.0	<5.0	<1.0	<5.0	<0.01
ICV		1.0	0.95	0.96	0.99	0.99	0.20	0.95	0.053
CCV		0.98	1.0	0.94	1.0	0.95	0.19	0.92	0.053
Reporting Limit		5.0	0.50	1.0	5.0	5.0	1.0	5.0	0.01
RPD		1	1	0	1	3	0	0	2
% Extraction Accuracy		105	105	100	105	105	64*	99	91
% Instrument Accuracy		99	98	95	99	97	95	94	106

Received Hobbs COC MAR 1998

***NOTE: Used LCS Extraction Accuracy for Ag due to matrix effect.**

CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba: RR Hg: HC
METHODS: EPA SW 846-1311, 6010B, 7470.
TCLP METALS SPIKE: 20 mg/L As, Se, Cd, Cr, Pb, Ba; 5.0 mg/L Ag; 0.050 mg/L Hg.
TCLP METALS CV: 1.0 mg/L As, Se, Cd, Cr, Pb, Ba; 0.20 mg/L Ag; 0.050 mg/L Hg.

Director, Dr. Blair Leftwich

3-2-98
Date

TRACE ANALYSIS, INC.

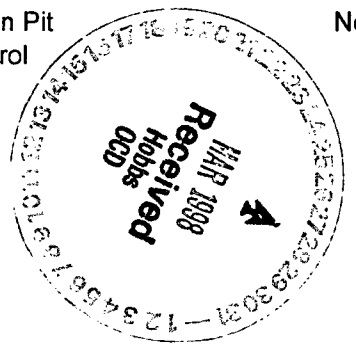
6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

March 02, 1998
Receiving Date: 02/04/98
Sample Type: Sludge
Project No: NA
Project Location: NA

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

Extraction Date: 02/09/98
Analysis Date: 02/11/98
Sampling Date: 02/02/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	IGNITABILTY
	EPA LIMIT =	---	500	250	---	<2 >12.5	---
T90349	Neutralization Pit	Non-reactive	<10	3.0	Non-corrosive	4.4	Nonignitable
QC	Quality Control	---	---	---	---	7.0	---
RPD		0	0	0	0	0	0
% Extraction Accuracy		---	---	---	---	---	---
% Instrument Accuracy		---	---	---	---	100	---



METHODS: EPA SW 846-Chapter 7 7.3, Chapter 7 7.2, Chapter 7 7.1.
CHEMIST: JG

Director, Dr. Blair Leftwich

3-2-98
DATE

90349

Star Enterprise

TraceAnalysis, Inc.

6701 Aberdeen Avenue, Ste. 9 Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

LAB Order ID # 61

Consulting Company Name: NAVAJO REFINING CO. Phone #: 505-748 3311
Address: 501 E. MAIN Fax #:
Consulting Contact: BRYAN MADRID Star Contract:
Location Code: Casuality Loss #: Star Job #
Consultant Job #
Location Address: Sampler Signature: Bryan Madrid

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME
90349	NEUTRALIZATION PIT	1	1L				X				X	2/2/98	15:00

ANALYSIS REQUEST (Circle or Specify Method No.)

MTBE 8020/602	BTEX 8020/602	TPH	PAH 8270	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	GC.MS Vol. 8240/8260/624	GC/MS Semi. Vol. 8270/625	PCB's 8080/608	Pest. 8080/608	BOD, TSS, PH						Turn Around Time if different from standard	Hold
					X	X	X	X												

no Pest. per Bryan 2-5-98 JMB

Relinquished by: Bryan Madrid Date: 2/3/98 Time: 16:15
Received by: Date: Time:
Relinquished by: Date: Time:
Received by: Date: Time:
Relinquished by: Date: Time:
Received at Laboratory by: Vicki Lindhan Date: 2-4-98 Time: 10:30 AM

LAB USE ONLY
Intact Y / N
Headspace Y / N
Temp -2°
Log-in Review

REMARKS:

Carrier # Fed Ex 348 8501 843

Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C.O.C.

ORIGINAL COPY

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-1
Originated 8/1

Submit Orig
Plus 1 C
to appropr
District Of

RECEIVED
MAR 31 1998
Environmental Bureau
Oil Conservation Division

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Lovington Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Ramirez Trucking
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 5 miles south of Lovington	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajo Refining Lovington facility. The material was generated by an asphalt spill. I have included a certificate of waste and a chain of custody.

Received
MAR 1998
Hobbs
OCD

Mail w/ to Hobbs 3/31/98

03-012

Estimated Volume 48 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo Waste Management Facility Authorized Agent TITLE: Environmental Compliance Manager DATE: 03/24/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR DATE: 3/28/98

APPROVED BY: Martyne J. Kelly TITLE: Env. Geologist DATE: 3/31/98

TELEPHONE
(505) 748-3311

EASYLINK
62905278

NAVAJO REFINING COMPANY

501 EAST MAIN STREET • P. O. BOX 159
ARTESIA, NEW MEXICO 88211-0159

FAX
(505) 746-6410 ACCTG
(505) 746-6155 EXEC
(505) 748-9077 ENGR
(505) 746-4438 P / L

March 20, 1998

Ken Marsh
CRI Inc.
P.O. Box 369
Hobbs, NM 88241

Dear Mr. Marsh:

I would like to get a few wastes generated at our Artesia and Lovington plants profiled into your facility. Below you will find a brief description along with the quantity of each waste generated. Enclosed are results from a TCLP analysis run by Trace Analysis Inc. and a Certificate of Waste Status for each non hazardous media

At our plant in Lovington, a crude oil tank (Tk 1201B) that had been out of service was sandblasted and repaired for future use. We now have approximately 100 yards of sand that we would like to send to your facility.

A recent asphalt spill inside the Lovington plant produced approximately 48 yards of an asphalt, dirt, and rock mixture. Asphalt has been approved in the past in both Artesia and Lovington, and since process has not changed, I would like to include it when we start transporting waste to your facility.

At our Artesia plant, isom feed from the naphtha splitter, located in the naphtha hydrotreater, is sent to the isom feed sulfur guard drums (D-41 and D-42). These drums are filled with a catalyst known as sulfur guard which absorbs any sulfur that may be present in the feed. Desulfurized feed is then sent to charge our isom unit. A change out of sulfur guard in D-42 resulted in the accumulation of 36 drums of catalyst. Before shipment, these drums will be transferred into 20 yard roll off bins.

Received
OCD
Hobbs
MAR 1998

In our Alkylation Unit, caustic in a neutralization pit is used to counter acid soluble oils that may have a low p.h. During this process, solids build up on the bottom of the pit and need to be cleaned out on a regular basis. We currently have approximately 700 barrels of sludge in frac tanks and will generate an average 120 barrels of sludge a week. We would like to send the already accumulated and future loads of this waste to your facility.

In our CCR Unit, hydrogen chloride is removed from reformate in a hydrogen chloride guard drum (D-342). This drum is filled with an absorbing catalyst called chloride guard. A recent change out of chloride guard resulted in the generation of 15 yards of spent catalyst that is now stored a 20 yard roll off bin.

At a crude holding station called Lynch, a leaking pump and a recent tank overflow generated approximately 30 yards of contaminated soil. This soil was cleaned up and is ready for disposal.

Tentatively scheduled, Ramirez Trucking will haul Tk 1201B blast sand and asphalt, Lea Land trucks will haul roll off bins filled with sulfur guard and chloride guard, I&W pumper trucks will transport neutralization pit sludge, and B&H Trucking will haul crude contaminated soil to your facility.

If you have any questions, please call me at (505) 748-3311. Thank you for your time in this matter.

Sincerely,

Bryan Madrid

Bryan Madrid
Environmental Specialist

Encl.

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: LEA REFINING Co.

Sources: PETROLEUM REFINING - ASPHALT

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING Co. concur with the status of the waste from the subject site.

Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN

ARTESIA, NM 88210

Signature Bryan Madrid

Date 3/20/98

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Darrell Moore
501 East Main
Artesia, NM 88210

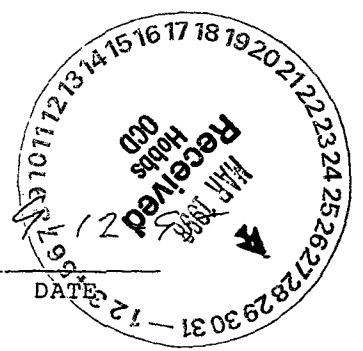
September 12, 1995
Receiving Date: 08/21/95
Sample Type: Solid
Project No: NA
Project Location: Artesia, Lovington, NM

Prep Date: 08/31/95
Analysis Date: 09/06/95
Sampling Date: 08/18/95
Sample Condition: Intact & Cool
Sample Received by: MS
Project Name: NA

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	IGNITABILITY FLASHPOINT (° F)
T40096	Ceramic Saddles & Balls	Non-reactive	<10.0	<2.5	Non-corrosive	7.32	Nonignitabl
T40098	Activated Alumina	Non-reactive	<10.0	<2.5	Non-corrosive	7.50	Nonignitabl
T40099	Asphalt	Non-reactive	<10.0	<2.5	Non-corrosive	7.06	>150
QC	Quality Control	---	---	---	---	7.0	---
RPD		0	0	0	0	0	0
% Extraction Accuracy		---	---	--	---	---	---
% Instrument Accuracy		---	---	--	---	100	---

METHODS: EPA SW 846-2.1.3, 2.1.2, 1010.

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell



DATE

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Darrell Moore
501 East Main
Artesia, NM 88210

September 12, 1995
Receiving Date: 08/21/95
Sample Type: Solid
Project No: NA
Project Location: Artesia, Lovington, NM

Extraction Date: 08/22/95
Analysis Date: 08/29/95
Sampling Date: 08/18/95
Sample Condition: Intact & Cool
Sample Received by: MS
Project Name: NA

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cr	Cd	Pb	Ba	Ag	Hg
	EPA LIMIT =	5.0	1.0	5.0	1.0	5.0	100.0	5.0	0.20
T40096	Ceramic Saddles & Balls	<0.1	0.6	<0.1	<0.1	<0.1	<1.0	0.01	<0.01
T40098	Activated Alumina	0.4	0.3	<0.1	<0.1	<0.1	<1.0	0.02	<0.01
T40099	Asphalt	<0.1	0.3	<0.1	<0.1	0.2	<1.0	<0.01	<0.01
QC	Quality Control	2.0	2.23	1.94	2.03	1.94	1.95	0.96	0.052
Reporting Limit		0.1	0.2	0.1	0.1	0.1	1.0	0.01	0.01
RPD		4	2	2	2	4	8	12	0
% Extraction Accuracy		89	83	88	89	77	94	84	102
% Instrument Accuracy		100	111	97	102	97	97	96	105

Received
Hobbs
MAR 1999
OCD

METHODS: EPA SW 846-1311, 6010, 7471.
TCLP METALS SPIKE: 4.0 mg/L As, Se, Cr, Cd, Pb, Ba, 1.0 mg/L Ag; 0.05 mg/L Hg.
TCLP METALS QC: 2.0 mg/L As, Se, Cr, Cd, Pb, Ba; 1.0 mg/L Ag; 0.05 mg/L Hg.

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

9-12-95
Date

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

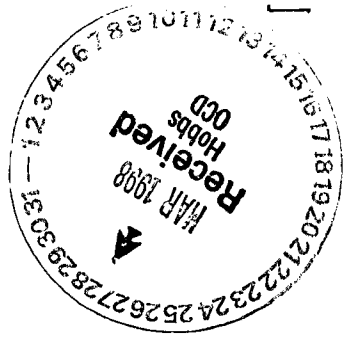
ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Darrell Moore
501 East Main
Artesia, NM 88210

September 12, 1995
Receiving Date: 08/21/95
Sample Type: Solid
Project No: NA
Project Location: Artesia, Lovington, NM

Extraction Date: 08/21/95
Analysis Date: 08/22/95
Sampling Date: 08/18/95
Sample Condition: I & C
Sample Received by: MS
Project Name: NA

TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T40099 Asphalt	QC	RPD	%EA	%IA
Vinyl chloride	0.20	0.05	ND	57	10	128	114
1,1-Dichloroethene	0.70	0.05	ND	59	3	119	118
Methyl Ethyl Ketone	200.0	0.5	ND	51	6	105	102
Chloroform	6.00	0.05	ND	58	1	118	116
1,2-Dichloroethane	0.50	0.05	ND	55	1	112	110
Benzene	0.50	0.05	ND	57	1	108	114
Carbon Tetrachloride	0.50	0.05	ND	58	3	115	116
Trichloroethene	0.50	0.05	ND	54	1	102	108
Tetrachloroethene	0.70	0.05	ND	55	2	102	110
Chlorobenzene	100.00	0.05	ND	54	0	104	108
1,4-Dichlorobenzene	7.50	0.05	ND	54	0	104	108

SURROGATES	% Recovery
Dibromofluoromethane	107
Toluene-d8	100
4-Bromofluorobenzene	97



ND = Not Detected

METHODS: EPA SW 846-1311, 8240.

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

9-12-95
DATE

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

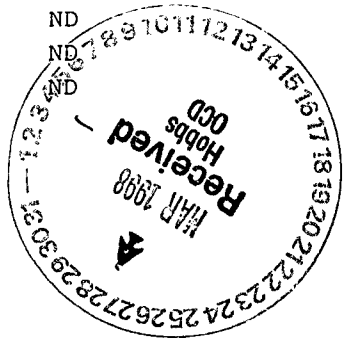
ANALYTICAL RESULTS FOR
NAVAJO REFINING
Attention: Darrell Moore
501 East Main
Artesia, NM 88210

September 12, 1995
Receiving Date: 08/21/95
Sample Type: Solid
Project No: NA
Project Location: Artesia, Lovington, NM

Extraction Date: 08/30/95
Analysis Date: 09/02/95
Sampling Date: 08/18/95
Sample Condition: I & C
Sample Received by: MS
Project Name: NA

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T40099 Asphalt	QC	%IA
Pyridine	5.0	0.05	ND	83	104
1,4-Dichlorobenzene	7.5	0.05	ND	81	101
o-Cresol	200.0	0.05	ND	81	101
m,p-Cresol	200.0	0.05	ND	157	98
Total Cresol	200.0	0.05	ND	---	---
Hexachloroethane	3.0	0.05	ND	87	109
Nitrobenzene	2.0	0.05	ND	81	101
Hexachlorobutadiene	0.5	0.05	ND	87	109
2,4,6-Trichlorophenol	2.0	0.05	ND	81	101
2,4,5-Trichlorophenol	400.0	0.05	ND	87	109
2,4-Dinitrotoluene	0.13	0.05	ND	80	100
2,4-D	10.0	0.05	ND	84	105
Hexachlorobenzene	0.13	0.05	ND	78	98
2,4,5-TP	1.0	0.05	ND	101	126
Pentachlorophenol	100.0	0.05	ND	91	114
Lindane	0.4	0.001	ND	80	100
Total Heptachlor	0.008	0.001	ND	---	---
Endrin	0.02	0.001	ND	62	78
Methoxychlor	10.0	0.001	ND	68	85
Chlordane	0.03	0.005	ND	---	---
Toxaphene	0.5	0.1	ND	---	---

Surrogates	% RECOVERY
2-Fluorophenol	76
Phenol-d6	77
Nitrobenzene-d5	71
2-Fluorobiphenyl	73
2,4,6-Tribromophenol	64
Terphenyl-d14	68



Methods: EPA SW 846-1311, 8270, 8080.
ND - Not Detected

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

9-12-95
DATE

NAVAJO REFINING COMPANY
P. O. BOX 159
ARTESIA, NM 88211-0159
(505) 748-3311, (505) 365-8364, (505) 365-8365 (24 Hours)

MATERIAL SAFETY DATA SHEET

EMERGENCY PHONE NUMBERS:

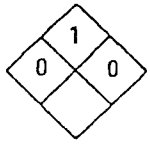
CHEMTREC: 1-800-424-9300 (for fire, spill and emergency response information)
NEW MEXICO POISON INFORMATION CENTER: 1-800-432-6866 (for poisoning)
TEXAS (EL PASO) POISON INFORMATION CENTER: (915) 533-1244 (for poisoning)
ARIZONA POISON INFORMATION CENTER: 1-800-362-0101 or (602) 253-3334 (for poisoning)

ASPHALT, PENETRATION GRADE

SECTION 1 - PRODUCT IDENTIFICATION

PRODUCT NAME: ASPHALT, PENETRATION GRADE CAS NUMBER: 8042-42-4
FORMULA: N.A. CHEMICAL FAMILY: Hydrocarbon
SYNONYMS: Petroleum Pitch, 60-70, 85-100, 120-150, Road Tar

Received
Hobbs
OCD
MAR 1998



NFPA 704 SYMBOL

SECTION 2 - HAZARDOUS INGREDIENTS

AZARDOUS COMPONENTS	CAS NO.	VOL%	TLV	PEL (OSHA)
ASPHALT (containing)	8042-42-4	100	N.A.	N.A.
Hydrogen Sulfide	7783-06-4	<0.1	10 ppm	10 ppm

OTHER INGREDIENT INFORMATION:
Asphalt is a complex mixture of paraffinic, aromatic, and naphthenic hydrocarbons. At high temperatures, petroleum asphalt fumes (CAS No. 8052-42-4) may be present. The exposure limit for these fumes is 5 mg/m^3.

SECTION 3 - PHYSICAL DATA

BOILING POINT: >700°F
VAPOR PRESSURE: N.A.
VAPOR DENSITY (AIR=1): N.A.
SOLUBILITY IN WATER: Insoluble
ODOR THRESHOLD: N.A.
SPECIFIC GRAVITY (WATER=1): 1.0-1.1
% VOLATILE BY VOLUME: 0%
EVAPORATION RATE: N.A.
AUTOIGNITION TEMP: 400-700°F
APPEARANCE AND ODOR: Black solid at room temperature with no appreciable odor. Liquid at elevated temperatures with tar like odor.

SECTION 4 - FIRE AND EXPLOSION HAZARD DATA

CLASSIFICATION: CLASS IIIB, COMBUSTIBLE LIQUID
FLASH POINT: >400°F (COC)
FLAMMABLE LIMITS: LEL = N.A. UEL = N.A.
EXTINGUISHING MEDIA: Dry chemical, CO_2.
SPECIAL FIRE FIGHTING PROCEDURES: Move container from fire area if possible. Use water to keep fire exposed containers cool.
UNUSUAL FIRE AND EXPLOSION HAZARDS: Evacuate a radius of 1500 feet for uncontrolled fires. Water for foam may cause frothing and evolution of steam. Fumes may accumulate from low boiling hydrocarbons and hydrogen sulfide. Iron sulfide may also accumulate.
NFPA FIRE = 1 (low)

SECTION 5 - REACTIVITY DATA

STABILITY: Stable
HAZARDOUS POLYMERIZATION: Will not occur
CONDITIONS TO AVOID/INCOMPATABILITY: Strong oxidizers
HAZARDOUS DECOMPOSITION PRODUCTS: Carbon monoxide, carbon dioxide and sulfur dioxide.

NFPA REACTIVITY = 0 (minimal)

SECTION 6 - HEALTH HAZARD DATA

ROUTES OF ENTRY: At room temperature asphalt is a solid. At elevated temperatures there may be inhalation of fumes or skin contact.

HEALTH HAZARDS: Dermititis, eye, skin or lung irritation. Hot asphalt can cause severe burns. Possibility of skin cancer.

CARCINOGENICITY: Asphalt is not listed by NTP or IARC.

SIGNS AND SYMPTOMS OF EXPOSURE: Skin irritation, irritation of nose and throat, burns from contact with hot asphalt.

Received
Hobbs
OCD
MAR 1998

EMERGENCY AND FIRST AID PROCEDURES:

INHALATION: Maintain respirations, assist with artificial respiration if needed and give oxygen if available and trained to do so. Seek medical attention.

BURNS: Immediately cool skin by quenching with cold water. Cover with a sterile dressing and seek medical assistance.

NFPA HEALTH = 0 (minimal)

SECTION 7 - PRECAUTIONS FOR SAFE HANDLING AND USE

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Contain spill. Allow to cool. Remove sources of ignition. Pick up with shovels ;or tractors. Place in appropriate waste containers.

WASTE DISPOSAL: Dispose in accordance with RCRA regulations. Do not put in sewers or any water course.

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: Asphalt is normally stored at high temperatures. It can cause severe burns.

OTHER PRECAUTIONS: Avoid breathing vapors. Always wear protective equipment and clothing when handling hot asphalt. Do not weld on containers unless they have been properly cleaned and purged using safe work practices.

SECTION 8 - ENVIRONMENTAL AND SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION: Use NIOSH\MSHA approved respiratory protection in areas exceeding exposure limits, the type to be determined by the degree of exposure.

VENTILATION: Use in well ventilated area. Mechanical exhaust should be explosion proof.

EYE/SKIN PROTECTION: Full face protection, heavy leather gloves, coveralls with long sleeves.

WORK/HYGIENIC PRACTICES: Remove contaminated clothing as soon as possible. Always wash after handling hazardous chemicals.

NOTICE: This product contains a toxic chemical or chemicals subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372.

REFER TO DEPARTMENT OF TRANSPORTATION (DOT) EMERGENCY RESPONSE GUIDEBOOK GUIDE 27 FOR ADDITIONAL EMERGENCY INFORMATION.

This information is believed to be accurate and as reliable as information available to us. We make no warranty or guarantee as to its accuracy and assume no liability from its use. Users should determine the suitability of the information for their particular purposes.

TraceAnalysis, Inc.

6701 Aberdeen Avenue Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: Darrell Moore
Phone #:
FAX #:
Company Name & Address: Navajo Refining Co.
Project #:
Project Name :
Project Location: Artesia ~ Lovington N. MX.
Sampler Signature: Darrell Moore

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	OTHER	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	OTHER	SAMPLING: DATE	TIME	BTEX, MTBE	TPH	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	TDS	RCI	Turn around # of days	Fax ASAP	Report TWC direct	Hold
~~40095~~	~~40095~~	~~1~~						X						8/14/95	13:30			X	~~X~~	X	X		X				X
96	40095	1						X						" "	13:45			X		X	X		X				
~~95~~	96	1						X						" "	14:20			X		X	X		X				
98	97	Activated Alumina	1					X						" "	14:15			X		X	X		X				
99	98	Asphalt	1					X						" "	14:30			X		X	X		X				

Received Hobbs OCD AUG 22 1995

Relinquished by: Darrell Moore	Date: 8/18/95	Times: 16:30	Received by:
Relinquished by:	Date:	Times:	Received by:
Relinquished by:	Date: 8-21-95	Times:	Received by Laboratory: MS CT

REMARKS

233AB

233AB

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
APR 07 1998
Oil Conservation Division

Form C
Originated

Submit C
Plus
to appr
District

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Sweatt
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E Main Artesia	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is for the Navajo Refining Artesia facility. The material was generated by by the excavation of soil to construct a tail gas unit. I have included a certificate of waste and a chain of custody.

APR 1998
Received
Hobbs
OCD

Printed in Hobbs 4/6/98

03-018

Estimated Volume 1000 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

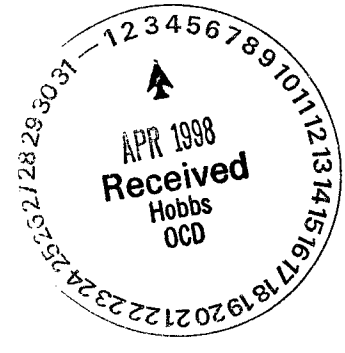
SIGNATURE: _____ TITLE: Environmental Compliance Manager DATE: 03/30/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR DATE: 4/6/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 4/8/98


APR 1998
Received
Hobbs
OCD

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
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District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C
Originatec

Submit (
Plus
to appr
Distric

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Sweatt
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E Main Artesia	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from th Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis t PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous b listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is for the Navajo Refining Artesia facility. The material was generated by by the excavation of soil to construct a tail gas unit. I have included a certificate of waste and a chain of custody.

APR 1998
Received
Hobbs
OCD

APR 1998
RECEIVED
OCD - ARTESIA

03-018

Estimated Volume 1000 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Environmental Compliance Manager DATE: 03/30/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR DATE: 4/6/98

APPROVED BY: _____ TITLE: _____ DATE: _____

TELEPHONE
(505) 748-3311

EASYLINK
62905278

Navajo REFINING COMPANY

501 EAST MAIN STREET • P. O. BOX 159
ARTESIA, NEW MEXICO 88211-0159

FAX
(505) 746-6410 ACCTG
(505) 746-6155 EXEC
(505) 748-9077 ENGR
(505) 746-4438 P / L

March 25, 1998

Ken Marsh
CRI Inc.
P.O. Box 369
Hobbs, NM 88241

Dear Mr. Marsh:

A Tail Gas Unit was recently constructed here at Navajo. Part of the construction process involved the excavation of soil in order to lay a foundation. When this dirt was removed, it was found that much of the soil had been contaminated from spills in the past. A TCLP analysis performed by Trace Analysis Inc. showed this soil to be non hazardous. If accepted into your facility, Sweatt Construction will haul the approximately 300 yards of accumulated dirt. Enclosed you will find the analysis mentioned above plus a Certificate of Waste status for this soil.

If you have any questions, please call me at (505) 748-3311. Thank you for your time in this matter.

Sincerely,

Bryan Madrid

Bryan Madrid
Environmental Specialist

Encl.

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: NAVAJO REFINING CO.

Sources: PETROLEUM REFINING - TAIL GAS UNIT CONTAM. SOIL

Disposal Location: CRI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned, as the agent for NAVAJO REFINING CO. concur with the status of the waste from the subject site.

APR 1998
Received
Hobbs
OCD

Name BRYAN MADRID

Title/Agency ENV. SPEC.

Address 501 E. MAIN
ARTESIA, NM 88210

Signature Bryan Madrid

Date 3/25/98

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

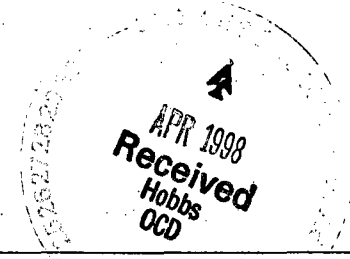
ANALYTICAL RESULTS FOR
Navajo Refining
Attention: Bryan Madrid
501 E. Main
Artesia NM 88210

Date: Feb 17, 1998
Date Rec: 2/9/98
Project: N/A
Proj Name: N/A
Proj Loc: N/A

Lab Receiving # : 9802000140
Sampling Date: 2/6/98
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Vol in Soil (mg/L)	EPA Limit	Reporting Limit	Method Blank	T90568 Tail Gas Unit	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	111	3	70	111
1,1-Dichloroethene	0.7	0.05	ND	ND	100	1	90	100
Methyl Ethyl Ketone	200.0	0.50	ND	ND	87	16	89	87
Chloroform	6.0	0.05	ND	ND	94	4	106	94
1,2-Dichloroethane	0.5	0.05	ND	ND	88	6	106	88
Benzene	0.5	0.05	ND	ND	99	5	101	99
Carbon Tetrachloride	0.5	0.05	ND	ND	90	1	115	90
Trichloroethene	0.5	0.05	ND	ND	99	1	99	99
Tetrachloroethane	0.7	0.05	ND	ND	96	3	97	96
Chlorobenzene	100.0	0.05	ND	ND	99	5	95	99
1,4-Dichlorobenzene	7.5	0.05	ND	ND	99	3	97	99

	% RECOVERY
Dibromofluoromethane	105
Toluene-d8	102
4-Bromofluorobenzene	102



TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Vol	EPA 1311	2/10/98	EPA 8260	2/11/98	AG	100 ea	100 ea

BL

Director, Dr. Blair Leftwich

2-17-98

Date

TRACE ANALYSIS, INC.

An Institute for Advanced Environmental Research and Analysis

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

February 27, 1998
Receiving Date: 02/09/98
Sample Type: Soil
Project No: NA
Project Location: NA

Extraction Date: 02/11/98
Analysis Date: 02/17/98
Sampling Date: 02/06/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T90568 Tail Gas Unit	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	82	44*	5	103
1,4-Dichlorobenzene	7.5	0.05	ND	77	4	23	96
o-Cresol	200.0	0.05	ND	78	10	41	98
m,p-Cresol	200.0	0.05	ND	81	12	76	101
Hexachloroethane	3.0	0.05	ND	79	13	24	99
Nitrobenzene	2.0	0.05	ND	78	2	48	98
Hexachlorobutadiene	0.5	0.05	ND	77	24*	28	96
2,4,6-Trichlorophenol	2.0	0.05	ND	80	12	43	100
2,4,5-Trichlorophenol	400.0	0.05	ND	83	15	42	104
2,4-Dinitrotoluene	0.13	0.05	ND	84	18	53	105
2,4-D	10.0	0.05	ND	77	17	145	96
Hexachlorobenzene	0.13	0.05	ND	81	13	66	101
2,4,5-TP	1.0	0.05	ND	76	12	166	95
Pentachlorophenol	100.0	0.05	ND	85	25*	67	106

Surrogates	**% RECOVERY**	
2-Fluorophenol	26	
Phenol-d6	14**	(24-113)
Nitrobenzene-d5	49	
2-Fluorobiphenyl	42	
2,4,6-Tribromophenol	55	
Terphenyl-d14	92	

***NOTE: RPD out of range <20%.**
****NOTE: Surrogate recovery out of range due to matrix and dilution.**

ND - Not Detected

Methods: EPA SW 846-1311, 8270.
CHEMIST: MB

APR 1998 Received Hobbs OCD

Director, Dr. Blair Leftwich

2-27-98
DATE

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

February 27, 1998
Receiving Date: 02/09/98
Sample Type: Soil
Project No: NA
Project Location: NA

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

Extraction Date: 02/09/98
Analysis Date: 02/10/98
Sampling Date: 02/06/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cd	Cr	Pb	Ag	Ba	Hg
	EPA LIMIT =	5.0	1.0	1.0	5.0	5.0	5.0	100.0	0.20
T90568	Tail Gas Unit	<0.50	<0.50	<0.10	<0.50	<0.50	<0.10	0.74	<0.010
ICV		0.98	1.0	0.96	0.98	0.96	0.19	0.92	0.053
CCV		1.0	1.1	0.98	1.0	1.0	0.20	1.0	0.052
Reporting Limit		0.50	0.50	0.10	0.50	0.50	0.10	0.50	0.010
RPD		1	1	1	1	0	8	1	0
% Extraction Accuracy		105	105	100	100	98	117	95	110
% Instrument Accuracy		99	105	97	99	98	95	94	105

Received FEB 1998 Hobbs OCD

CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba: RR Hg: HC
METHODS: EPA SW 846-1311, 6010B, 7470.
TCLP METALS SPIKE: 20 mg/L As, Se, Cd, Cr, Pb, Ba; 5.0 mg/L Ag; 0.050 mg/L Hg.
TCLP METALS CV: 1.0 mg/L As, Se, Cd, Cr, Pb, Ba; 0.20 mg/L Ag; 0.050 mg/L Hg.

Director, Dr. Blair Leftwich

2-27-98
Date

TRACEANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

Received
FEB 27 1998

February 27, 1998
Receiving Date: 02/09/98
Sample Type: Soil
Project No: NA
Project Location: NA

ANALYTICAL RESULTS FOR
NAVAJO REFINING COMPANY
Attention: Bryan Madrid
501 E. Main
Artesia, NM 88210

Extraction Date: 02/10/98
Analysis Date: 02/10/98
Sampling Date: 02/06/98
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: NA

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY —	pH (s.u.)	IGNITABILITY
	EPA LIMIT =	---	500	250	---	<2 >12.5	---
T90568	Tail Gas Unit	Non-reactive	<10	<2.5	Non-corrosive	7.9	Nonignitable
QC	Quality Control	---	---	---	---	8.0	---
RPD		0	0	0	0	0	0
% Extraction Accuracy		---	---	---	---	---	---
% Instrument Accuracy		---	---	---	---	100	---

Received
Hobbs
OCD
FEB 26 1998

METHODS: EPA SW 846-Chapter 7 7.3, Chapter 7 7.2, Chapter 7 7.1.
CHEMIST: JG

Director, Dr. Blair Leftwich

2-27-98
DATE

0567-69

TraceAnalysis, Inc.

6701 Aberdeen Avenue, Ste. 9 Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

LAB Order ID # 140/141

Company Name: NAVAJO REFINING CO. Phone #:
Address: 501 E. MAIN Fax #:
Contact Person: BRYAN MADRID
Invoice to: (If different from above)
Project #: Project Name:
Project Location: Sampler Signature: Bryan Madrid

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME
90567	1201-B SAND	1	1L		S						X	2/6/98	14:15
68	TAIL GAS UNIT	1	1L		X						X	2/6/98	15:00
69	TANK 8	1	1L				X				X	2/6/98	15:10

ANALYSIS REQUEST (Circle or Specify Method No.)

LAB #	MTBE 8020/602	BTEX 8020/602	TPH	PAH 8270	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	GC.MS Vol. 8240/8260/624	GC/MS Semi. Vol. 8270/625	PCB's 8080/608	Pest. 8080/608	BOD, TSS, PH	Tetra Pb *				Turn Around Time if different from standard	Hold
90567						X	X	X	X											
68						X	X	X	X											
69						X	X	X	X						X					

Relinquished by: Bryan Madrid Date: 2/6/98 Time: 16:15
Received by: Date: Time:
Relinquished by: Date: Time:
Received by: Date: Time:
Relinquished by: Date: Time:
Received at Laboratory by: Vicki Wrenhan Date: 2-9-98 Time: 10:00AM

LAB USE ONLY
Intact (Y) N
Headspace Y / N
Temp 5 °
Log-in Review BMG.

REMARKS:
* We want to know if tetra-ethyl-lead is present.

Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C.O.C.

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
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1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-13
Originated 8/8/

RECEIVED
APR 13 1998
Environmental Bureau
Oil Conservation Division

Submit Origi
Plus 1 Co
to appropri
District Off

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator B J Services
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Hobbs Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Sonny's
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR)2708 W County Road Hobbs	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the BJ Services Hobbs Facility. The waste was generated by washing trucks. I have included a certificate of waste and a chain of custody.

04-004

APR 1998 Received Hobbs OCD

Printed in Hobbs 4/17/98

Estimated Volume 225 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Environmental Compliance Manager DATE: 04/08/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env. Engr DATE: 4-13-98

APPROVED BY: _____ TITLE: Env. Geologist DATE: 4/17/98

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR B.J SERVICES

ADDRESS 2708 W. County Rd.

GENERATING SITE WASH BAY

COUNTY LEA STATE NM.

TYPE OF WASTE WASH BAY

ESTIMATED VOLUME 225 ± BBLS

GENERATING PROCESS WASHING TRUCKS

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY Sonoj's

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT Dan V. Miller
SIGNATURE

NAME DAN V. Miller
PRINTED

ADDRESS 2708 W. County Road

Hobbs NM

DATE 4-8-98

APR 1998 Received Hobbs OCD

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
BJ SERVICES
2708 N. WEST COUNTY ROAD
HOBBS, NM 88240
FAX TO:

Receiving Date: 03/19/98
Reporting Date: 03/27/98
Project Owner: BJ SERVICES
Project Name: WASHBAYS (2) COMPOSITE
Project Location: HOBBS, NM YARD

Sampling Date: 03/19/98
Sample Type: WASTEWATER
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: GP

TCLP METALS

LAB NUMBEF SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:	03/25/98	03/20/98	03/20/98	03/20/98	03/20/98	03/20/98	03/26/98	03/25/98
EPA LIMITS:	5	5	100	1	5	5	0.2	1
H3519-1 WASH BAY COMP.	<1	<1	<5	<0.1	<1	<1	<0.02	<0.1
Quality Control	0.211	5.014	21.70	2.011	4.929	5.211	0.0103	0.206
True Value QC	0.200	5.000	20.00	2.000	5.000	5.000	0.0100	0.200
% Recovery	106	100	109	101	99	104	103	103
Relative Standard Deviation	8.3	0.6	6.6	0.7	0.6	2.1	3.9	2.6
METHODS: EPA 1311, 600/4-91/0	206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2

Gayle A. Potter, Chemist

03/27/98
Date

APR 1998
Received
Hobbs
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H3519M.XLS

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ANALYTICAL RESULTS FOR
BJ SERVICES
2708 N. WEST COUNTY ROAD
HOBBS, NM 88240
FAX TO:

Receiving Date: 03/19/98
Reporting Date: 03/26/98
Project Owner: BJ SERVICES
Project Name: WASHBAYS (2) COMPOSITE
Project Location: HOBBS, NM YARD

Sampling Date: 03/19/98
Sample Type: WASTEWATER
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: AH/BC

LAB NUMBER	SAMPLE ID	REACTIVITY Sulfide (ppm)	Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY (°F)
ANALYSIS DATE:		03/20/98	03/20/98	03/25/98	03/25/98
H3519-1	WASH BAY COMP	Not reactive	Not reactive	9.11	Nonflammable
Quality Control		NR	NR	7.03	NR
True Value QC		NR	NR	7.00	NR
% Accuracy		NR	NR	100	NR
Relative Percent Difference		NR	NR	0.4	NR

METHOD: EPA SW 846-7.3, 7.2, 1010, 1311, *40 CFR 261*

Chemist

3/26/98
Date

APR 1998 Received Hobbs OCD

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ANALYTICAL RESULTS FOR
BJ SERVICES
2708 N. WEST COUNTY ROAD
HOBBS, NM 88240
FAX TO:

Receiving Date: 03/19/98
Reporting Date: 03/24/98
Project Owner: BJ SERVICES
Project Name: WASHBAYS (2) COMPOSITE
Project Location: HOBBS, NM YARD
Lab Number: H3519-1
Sample ID: WASH BAY COMP.

Analysis Date: 03/23/98
Sampling Date: 03/19/98
Sample Type: WASTEWATER
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC

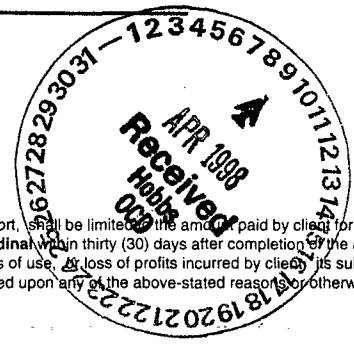
TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Sample Result H3519-1	Method Blank	QC	% Recov.	True Value QC
Pyridine	5.00	<0.020	<0.002	0.012	12	0.100
1,4-Dichlorobenzene	7.50	<0.020	<0.002	0.027	27	0.100
o-Cresol	200	<0.020	<0.002	0.035	35	0.100
m, p-Cresol	200	<0.020	<0.002	0.037	37	0.100
Hexachloroethane	3.00	<0.020	<0.002	0.023	23	0.100
Nitrobenzene	2.00	<0.020	<0.002	0.046	46	0.100
Hexachloro-1,3-butadiene	0.500	<0.020	<0.002	0.037	37	0.100
2,4,6-Trichlorophenol	2.00	<0.020	<0.002	0.053	53	0.100
2,4,5-Trichlorophenol	400	<0.020	<0.002	0.058	58	0.100
2,4-Dinitrotoluene	0.130	<0.020	<0.002	0.068	68	0.100
Hexachlorobenzene	0.130	<0.020	<0.002	0.060	60	0.100
Pentachlorophenol	100	<0.020	<0.002	0.062	62	0.100

	% RECOVERY
Fluorophenol	30
Phenol-d5	26
Nitrobenzene-d5	51
2-Fluorobiphenyl	57
2,4,6-Tribromophenol	57
Terphenyl-d14	78

METHODS: EPA SW 846-8270, 1311

Burgess J. A. Cooke, Ph. D.

3/24/98
Date



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ANALYTICAL RESULTS FOR
BJ SERVICES
2708 N. WEST COUNTY ROAD
HOBBS, NM 88240
FAX TO:

Receiving Date: 03/19/98
Reporting Date: 03/23/98
Project Owner: BJ SERVICES
Project Name: WASHBAYS (2) COMPOSITE
Project Location: HOBBS, NM YARD
Lab Number: H3519-1
Sample ID: WASH BAY COMP.

Analysis Date: 03/20/98
Sampling Date: 03/19/98
Sample Type: WASTEWATER
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC

TCLP VOLATILES (ppm)	EPA LIMIT	Sample Result	Method Blank	QC	%Recov.	True Value QC
Vinyl Chloride	0.20	<0.005	<0.005	0.115	115	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.097	97	0.100
Methyl Ethyl Ketone	200	<0.050	<0.050	0.105	105	0.100
Chloroform	6.0	<0.005	<0.005	0.113	113	0.100
1,2-Dichloroethane	0.5	<0.005	<0.005	0.100	100	0.100
Benzene	0.5	<0.005	<0.005	0.114	114	0.100
Carbon Tetrachloride	0.5	<0.005	<0.005	0.102	102	0.100
Trichloroethylene	0.5	<0.005	<0.005	0.119	119	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.101	101	0.100
Chlorobenzene	100	<0.005	<0.005	0.119	119	0.100
1,4-Dichlorobenzene	7.5	<0.005	<0.005	0.116	116	0.100

	% RECOVERY
Dibromofluoromethane	92
Toluene-d8	92
Bromofluorobenzene	84

METHODS: EPA SW 846-8260, 1311

Burgess J. A. Cooke, Ph. D.

3/23/98
Date

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101 East Marland, Hobbs, NM 88240 (505) 393-2326 Fax (505) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

H3519

Page____ of____

Company Name:	BJ SERVICES	BILL TO	PO #:
Project Manager:		Company:	CRI
Address:	2708 N WEST COUNTY ROAD	Attn:	KEN MORESH
City:	HOBBS State: NM Zip:	Address:	
Phone #:	505-392-5556	City:	HOBBS
Fax #:		State:	NM Zip:
Project #:	Project Owner: BJ SERVICES	Phone #:	
Project Name:	WASH BAYS (2) COMPOSITE	Fax #:	
Project Location:	HOBBS, N. M. - YARD		

FOR LAB USE ONLY				MATRIX						PRES.			SAMPLING		ANALYSIS REQUEST
LAB I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID:	ICE / COOL	OTHER:	DATE	TIME	TCLP - COMPLETE
H3519-1	WASH BAY COMP		2		✓						✓		03/19/98	1:45	✓

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Terms and Conditions: Interest will be charged on all accounts more than 30 days past due at the rate of 24% per annum from the original date of invoice, and all costs of collections, including attorney's fees.

Sampler Relinquished:	Date: 03/19/98 Time: 1:45	Received By:	Phone Result ☐ Yes ☐ No Additional Fax #:
Relinquished By:	Date: 03/19/98 Time: 2:00	Received By: (Lab Staff)	Fax Result: ☐ Yes ☐ No
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	Sample Condition Cool: ☒ Yes ☐ No Intact: ☒ Yes ☐ No	CHECKED BY: (Initials)	REMARKS:

† Cardinal cannot accept verbal changes. Please fax written changes to 915-673-7020.

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
APR 07 1998
Oil Conservation Division

Form C-13
Originated 8/8/

Submit Origi
Plus 1 Co
to appropri
District Off

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Verbal Approval Received: Yes ☐ No ☐	4. Generator Baker Oil Tools 5. Originating Site Hobbs facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Rowland Trucking
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 507 W County Road Hobbs	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Baker Oil Tools Hobbs facility. The material was generated by steaming tools. This material has been approved in the past. I have inclused a certificate of waste and a chain of custody.

04-002

APR 1998
Received
Hobbs
OCD

Printed in Hobbs 4/6/98

Estimated Volume 60 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Environmental Compliance Manager DATE: 04/03/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR DATE: 4-6-98

APPROVED BY: _____ TITLE: Env Geologist DATE: 4/8/98

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31
APR 1998
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Hobbs
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BAKER OIL TOOLS

FAX TRANSMITTAL MEMO

HOBBS, NEW MEXICO

Telephone: 505-397-3671 • Fax: 505-393-4213

Date:	4-13-98		
To:	Billie Charo	**From:**	Ray Dockery
Location:		**Ref:**	
Company:	CRI	**Subject:**	Sump disposal
Fax No.:	393-3615	**# pgs:(inc. this pg)**	2
Copy:			

The waste we are sending remains the same as previously tested.

Ray Dockery

APR 1998
Received
Hobbs
OCD

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR Baker Oil Tools

ADDRESS P O Box 1828 Hobbs, NM 88240

GENERATING SITE 507 West County Road Hobbs

COUNTY Lea **STATE** NM

TYPE OF WASTE Sump water

ESTIMATED VOLUME 60 bbls

GENERATING PROCESS steaming tools

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY Rowland Trucking

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT Ray Dockery
SIGNATURE

NAME Ray Dockery
PRINTED

ADDRESS P O Box 1828

Hobbs, NM 88240

DATE 4-13-98

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

ANALYTICAL RESULTS FOR
BAKER OIL TOOLS
ATTN: BILL RUSSELL
507 W. COUNTY ROAD
HOBBS, NM 88240
FAX TO: 505-393-4213

Receiving Date: 02/05/98
Reporting Date: 02/13/98
Project Number: NOT GIVEN
Project Name: WASH BAY
Project Location: HOBBS, NM

Sampling Date: 02/05/98
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: GP/AH

TCLP METALS

LAB NUMBER	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:		02/12/98	02/06/98	02/11/98	02/12/98	02/12/98	02/12/98	02/10/98	02/06/98
EPA LIMITS:		5	5	100	1	5	5	0.2	1
H3444-1	WASHBAY	<1	<1	<5	<0.1	<1	<1	<0.02	<0.01
Quality Control		0.095	2.358	4.945	2.025	5.026	5.006	0.0087	0.0485
True Value QC		0.100	2.500	5.000	2.000	5.000	5.000	0.0100	0.0500
% Recovery		95	94	99	101	101	100	87	97
Relative Standard Deviation		7.5	0.5	14.6	0.9	1.9	4.7	8.9	10.1
METHODS: EPA 1311, 600/4-91/0		206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2

Chemist

Date 2/13/98

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ANALYTICAL RESULTS FOR
BAKER OIL TOOLS
ATTN: BILL RUSSELL
507 W. COUNTY ROAD
HOBBS, NM 88240
FAX TO: 505-393-4213

Receiving Date: 02/05/98
Reporting Date: 02/07/98
Project Number: NOT GIVEN
Project Name: WASH BAY
Project Location: HOBBS, NM
Lab Number: H3444-1
Sample ID: WASH BAY

Analysis Date: 02/06/98
Sampling Date: 02/05/98
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC

TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Sample Result H3444-1	Method Blank	QC	% Recov.	True Value QC
Pyridine	5.00	<0.008	<0.002	0.028	28	0.100
1,4-Dichlorobenzene	7.50	<0.008	<0.002	0.052	52	0.100
o-Cresol	200	0.011	<0.002	0.055	55	0.100
m, p-Cresol	200	0.008	<0.002	0.115	58	0.200
Hexachloroethane	3.00	<0.008	<0.002	0.050	50	0.100
Nitrobenzene	2.00	<0.008	<0.002	0.079	79	0.100
Hexachloro-1,3-butadiene	0.500	<0.008	<0.002	0.063	63	0.100
2,4,6-Trichlorophenol	2.00	<0.008	<0.002	0.067	67	0.100
2,4,5-Trichlorophenol	400	<0.008	<0.002	0.072	72	0.100
2,4-Dinitrotoluene	0.130	<0.008	<0.002	0.106	106	0.100
Hexachlorobenzene	0.130	<0.008	<0.002	0.088	88	0.100
Pentachlorophenol	100	<0.008	<0.002	0.091	91	0.100

	% RECOVERY
Fluorophenol	29
Phenol-d5	29
Nitrobenzene-d5	71
2-Fluorobiphenyl	72
2,4,6-Tribromophenol	76
Terphenyl-d14	97

METHODS: EPA SW 846-8270, 1311, 3510

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Hobbs
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Burgess J. A. Cooke, Ph. D.

2/7/98
Date

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ANALYTICAL RESULTS FOR
BAKER OIL TOOLS
ATTN: BILL RUSSELL
507 W. COUNTY ROAD
HOBBS, NM 88240
FAX TO: 505-393-4213

Receiving Date: 02/05/98
Reporting Date: 02/18/98
Project Number: NOT GIVEN
Project Name: WASH BAY
Project Location: HOBBS, NM

Sampling Date: 02/05/98
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC/HM

LAB NUMBER	SAMPLE ID	REACTIVITY Sulfide (ppm)	REACTIVITY Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY (°F)
ANALYSIS DATE:		02/13/98	02/13/98	02/17/98	02/18/98
H3444-1	WASHBAY	<50	<50	7.26	>140
Quality Control		NR	0.105	7.01	NR
True Value QC		NR	0.100	7.00	NR
% Accuracy		NR	105	100	NR
Relative Percent Difference		NR	0	0.2	NR

METHOD: EPA SW 846-7.3, 7.2, 1010, 1311, *40 CFR 261*

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Chemist

2/18/98
Date

H3444R.XLS

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ANALYTICAL RESULTS FOR
BAKER OIL TOOLS
ATTN: BILL RUSSELL
507 W. COUNTY ROAD
HOBBS, NM 88240
FAX TO: 505-393-4213

Receiving Date: 02/05/98
Reporting Date: 02/05/98
Project Number: NOT GIVEN
Project Name: WASH BAY
Project Location: HOBBS, NM
Lab Number: H3444-1
Sample ID: WASH BAY

Analysis Date: 02/05/98
Sampling Date: 02/05/98
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC

TCLP VOLATILES (ppm)	EPA LIMIT	Sample Result H3444-1	Method Blank	QC	%Recov.	True Value QC
Vinyl Chloride	0.20	<0.005	<0.005	0.103	103	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.087	87	0.100
Methyl Ethyl Ketone	200	0.055	<0.050	0.114	114	0.100
Chloroform	6.0	<0.005	<0.005	0.106	106	0.100
1,2-Dichloroethane	0.5	<0.005	<0.005	0.097	97	0.100
Benzene	0.5	0.009	<0.005	0.107	107	0.100
Carbon Tetrachloride	0.5	<0.005	<0.005	0.100	100	0.100
Trichloroethylene	0.5	<0.005	<0.005	0.112	112	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.095	95	0.100
Chlorobenzene	100	<0.005	<0.005	0.116	116	0.100
1,4-Dichlorobenzene	7.5	<0.005	<0.005	0.112	112	0.100

	% RECOVERY
Dibromofluoromethane	111
Toluene-d8	110
Bromofluorobenzene	97

METHODS: EPA SW 846-8260, 1311

Received
Hobbs
OCD

Burgess J. A. Cooke, Ph. D.

2/5/98
Date

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CARDINAL LABORATORIES, INC.

2111 Beechwood, Abilene, TX 79603 (915) 673-7001 Fax (915) 673-7020
101 East Marland, Hobbs, NM 88240 (505) 393-2326 Fax (505) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page____ of____

Company Name:	BAKER OIL TOOLS	BILL TO	PO #:
Project Manager:	BILL RUSSELL	Company:	BAKER
Address:	507 W County Road	Attn:	
City:	HOBBS State: NM Zip: 88240	Address:	P.O. Box 1626
Phone #:	505-397-3671	City:	HOBBS
Fax #:	505-393-4213	State:	NM Zip:
Project #:	WASH BAY Project Owner:	Phone #:	
Project Name:		Fax #:	
Project Location:	HOBBS		

ANALYSIS REQUEST

TCLP Compliance

Received by OCD Hobbs

FOR LAB USE ONLY LAB I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX: GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	PRES.: ACID:	ICE / COOL	OTHER:	SAMPLING: DATE	TIME
H 31444-1	WASH BAY	G	4		✓						✓		02/05/98	11:30

PLEASE NOTE: Liability 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 the client for the 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 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.

Terms and Conditions: Interest will be charged on all accounts more than 30 days past due at the rate of 24% per annum from the original date of invoice, and all costs of collections, including attorney's fees.

Sampler Relinquished:	Date:	Received By:	Phone Result ☐ Yes ☐ No Additional Fax #:
	Time:		Fax Result: ☐ Yes ☐ No
Relinquished By: Bill Russell	Date:	Received By: (Lab Staff)	REMARKS: COPY TO CRI
	Time:		
Delivered By: (Circle One) Sampler - UPS - Bus - Other:		Sample Condition Cool: ☐ Yes ☐ No Intact: ☐ Yes ☐ No	CHECKED BY: (Initials)

† Cardinal cannot accept verbal changes. Please fax written changes to 915-673-7020.

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
APR 07 1998
Environmental Bureau
Oil Conservation Division

Form C-13
Originated 8/8/

Submit Origi
Plus 1 Co
to appropri
District Off

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Baker Oil Tools
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Hobbs facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Rowland Trucking
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 507 W County Road Hobbs	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Baker Oil Tools Hobbs facility. The material was generated by steaming tools. This material has been approved in the past. I have inclused a cerrtificate of waste and a chain of custody.

04-001

APR 1998
Received
Hobbs
OCD

Printed in Hobbs 4/6/98

Estimated Volume 60 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Environmental Compliance Manager DATE: 04/03/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Envir Engr DATE: 4-6-98

APPROVED BY: _____ TITLE: Env Geologist DATE: 4/8/98

BAKER OIL TOOLS

FAX TRANSMITTAL MEMO

HOBBS, NEW MEXICO

Telephone: 505-397-3671 • Fax: 505-393-4213

Date:	4-6-98		
To:	Billie Charo	**From:**	Ray Dockery
Location:		**Ref:**	
Company:	CRI	**Subject:**	Sump disposal
Fax No.:	393-3615	**# pgs:(inc. this pg)**	2
Copy:			

The waste we are sending remains the same as previously tested.

Ray Dockery

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR Baker Oil Tools

ADDRESS P O Box 1828 Hobbs, NM 88240

GENERATING SITE 507 West County Road Hobbs

COUNTY Lea **STATE** NM

TYPE OF WASTE Sump water

ESTIMATED VOLUME 60 bbls

GENERATING PROCESS steaming tools

REMARKS

NMOCD FACILITY **CONTROLLED RECOVERY INC.**

TRUCKING COMPANY Rowland Trucking

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT Ray Dockery
SIGNATURE

NAME Ray Dockery
PRINTED

ADDRESS P O Box 1828

Hobbs, NM 88240

DATE 4-6-98

APR 1998
Received
Hobbs
OCD

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
BAKER OIL TOOLS
ATTN: BILL RUSSELL
507 W. COUNTY ROAD
HOBBS, NM 88240
FAX TO: 505-393-4213

Receiving Date: 02/05/98
Reporting Date: 02/13/98
Project Number: NOT GIVEN
Project Name: WASH BAY
Project Location: HOBBS, NM

Sampling Date: 02/05/98
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: GP/AH

TCLP METALS

LAB NUMBER	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:		02/12/98	02/06/98	02/11/98	02/12/98	02/12/98	02/12/98	02/10/98	02/06/98
EPA LIMITS:		5	5	100	1	5	5	0.2	1
H3444-1	WASHBAY	<1	<1	<5	<0.1	<1	<1	<0.02	<0.01
Quality Control		0.095	2.358	4.945	2.025	5.026	5.006	0.0087	0.0485
True Value QC		0.100	2.500	5.000	2.000	5.000	5.000	0.0100	0.0500
% Recovery		95	94	99	101	101	100	87	97
Relative Standard Deviation		7.5	0.5	14.6	0.9	1.9	4.7	8.9	10.1
METHODS: EPA 1311, 600/4-91/0		206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2

Chemist

APR 1998
Received
Hobbs
2/13/98
Date

PLEASE NOTE: Liability 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, 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
BAKER OIL TOOLS
ATTN: BILL RUSSELL
507 W. COUNTY ROAD
HOBBS, NM 88240
FAX TO: 505-393-4213

Receiving Date: 02/05/98
Reporting Date: 02/18/98
Project Number: NOT GIVEN
Project Name: WASH BAY
Project Location: HOBBS, NM

Sampling Date: 02/05/98
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC/HM

LAB NUMBER	SAMPLE ID	REACTIVITY Sulfide (ppm)	REACTIVITY Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY (°F)
ANALYSIS DATE:		02/13/98	02/13/98	02/17/98	02/18/98
H3444-1	WASHBAY	<50	<50	7.26	>140
Quality Control		NR	0.105	7.01	NR
True Value QC		NR	0.100	7.00	NR
% Accuracy		NR	105	100	NR
Relative Percent Difference		NR	0	0.2	NR

METHOD: EPA SW 846-7.3, 7.2, 1010, 1311, *40 CFR 261*

APR 1998
Received
Hobbs
OCD

Chemist

2/18/98
Date

H3444R XLS

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

ANALYTICAL RESULTS FOR
BAKER OIL TOOLS
ATTN: BILL RUSSELL
507 W. COUNTY ROAD
HOBBS, NM 88240
FAX TO: 505-393-4213

Receiving Date: 02/05/98
Reporting Date: 02/05/98
Project Number: NOT GIVEN
Project Name: WASH BAY
Project Location: HOBBS, NM
Lab Number: H3444-1
Sample ID: WASH BAY

Analysis Date: 02/05/98
Sampling Date: 02/05/98
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC

TCLP VOLATILES (ppm)	EPA LIMIT	Sample Result H3444-1	Method Blank	QC	%Recov.	True Value QC
Vinyl Chloride	0.20	<0.005	<0.005	0.103	103	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.087	87	0.100
Methyl Ethyl Ketone	200	0.055	<0.050	0.114	114	0.100
Chloroform	6.0	<0.005	<0.005	0.106	106	0.100
1,2-Dichloroethane	0.5	<0.005	<0.005	0.097	97	0.100
Benzene	0.5	0.009	<0.005	0.107	107	0.100
Carbon Tetrachloride	0.5	<0.005	<0.005	0.100	100	0.100
Trichloroethylene	0.5	<0.005	<0.005	0.112	112	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.095	95	0.100
Chlorobenzene	100	<0.005	<0.005	0.116	116	0.100
1,4-Dichlorobenzene	7.5	<0.005	<0.005	0.112	112	0.100

	% RECOVERY
Dibromofluoromethane	111
Toluene-d8	110
Bromofluorobenzene	97

METHODS: EPA SW 846-8260, 1311

APR 1998
Received
Hobbs
OCD

Burgess J. A. Cooke, Ph. D.

2/5/98
Date

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CARDINAL LABORATORIES, INC.

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

2111 Beechwood, Abilene, TX 79603 101 East Marland, Hobbs, NM 88240
(915) 673-7001 Fax (915) 673-7020 (505) 393-2326 Fax (505) 393-2476

Page____ of____

Company Name:	BAKER OIL TOOLS	BILL TO	PO #:
Project Manager:	BILL RUSSELL	Company:	BAKER
Address:	507 W County Road	Attn:	
City:	HOBBS State: NM Zip: 88240	Address:	P.O. Box 1828
Phone #:	505-397-3671	City:	HOBBS
Fax #:	505-393-4213	State:	NM Zip:
Project #:	WASH BAY Project Owner:	Phone #:	
Project Name:		Fax #:	
Project Location:	HOBBS		

ANALYSIS REQUEST

TCLP Chlorides

Received
Hobbs
OCD
JAN 1999

FOR LAB USE ONLY				MATRIX						PRES.			SAMPLING	
LAB I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID:	ICE / COOL	OTHER :	DATE	TIME
H 3444-1	WASH BAY	G	4		✓						✓		02/05/98	11:30

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Sampler Relinquished:	Date:	Received By:	Phone Result ☐ Yes ☐ No Additional Fax #:
	Time:		Fax Result: ☐ Yes ☐ No
Relinquished By: Bill Russell	Date:	Received By: (Lab Staff)	REMARKS: COPY TO CRI
	Time:		
Delivered By: (Circle One) Sampler - UPS - Bus - Other:		Sample Condition Cool ☐ Yes ☐ No Intact ☐ Yes ☐ No	CHECKED BY: (Initials)

† Cardinal cannot accept verbal changes. Please fax written changes to 915-673-7020.

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-1
Originated 8/1

Submit Orig
Plus 1 C
to appropr
District O

RECEIVED
APR 07 1998
Oil Conservation Division

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Verbal Approval Received: Yes ☐ No ☐	4. Generator B J Services 5. Originating Site Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter C R I
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 2401 Sevley Artesia	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is for the B J Services Artesia facility. The waste was generated by mud falling off of trucks onto shop floor and washed into drain. I have included a certificate of waste and a chain of custody.

APR 1998
Received
Hobbs
OCD

Printed in Hobbs

03-017

Estimated Volume 120 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Environmental Compliance Manager DATE: 03/30/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR DATE: 4-6-98

APPROVED BY: _____ TITLE: Env. Geologist DATE: 4/8/98

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
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1000 Rio Brazos Road
Aztec, NM 87410
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New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-1
Originated 8/1

Submit Orig
Plus 1 C
to appropr
District Of

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator B J Services
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter C R I
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 2401 Sevley Artesia	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is for the B J Services Artesia facility. The waste was generated by mud falling off of trucks onto shop floor and washed into drain. I have included a certificate of waste and a chain of custody.

APR 1998
RECEIVED
OCD - ARTESIA

APR 1998
Received
Hobbs
OCD

03-017

Estimated Volume 120 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Environmental Compliance Manager DATE: 03/30/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR DATE: 4-6-98

APPROVED BY: _____ TITLE: _____ DATE: _____

CERTIFICATE OF WASTE STATUS
NON-EMEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY / GENERATOR BJ Services Co, USA

ADDRESS 2401 Sivley, Artesia, NM 88210

GENERATING SITE _____

COUNTY Eddy STATE NM

TYPE OF WASTE Shop drain sludge

ESTIMATED VOLUME 120 bbl

GENERATING PROCESS Mud falling off of trucks onto shop floor and washed into drain.

REMARKS _____

NMOCD FACILITY _____

TRUCKING COMPANY CRI

As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Sections 2613.

AGENT _____
SIGNATURE

NAME Michael Wiggins
PRINTED

ADDRESS 2401 Sivley
Artesia, NM 88210

DATE 3-19-98

APR 1998
Received
Hobbs
OCD

Received
Hobbs
OCD

To: CRI

From: Mike Wiggins

Date: March 13, 1998

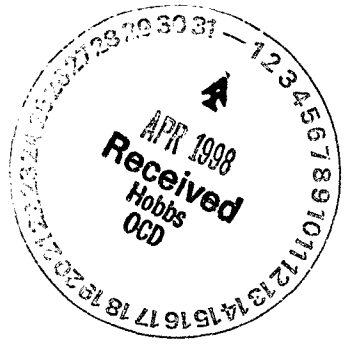
Re: Shop Drain Sludge

Please find the enclosed lab results from samples taken in the BJ Services, Artesia district shop drain.

Please make arrangements to come suck out our shop drain.

Thank you for your assistance on this matter. Should you have any questions, please call

Mike Wiggins
District Manager
BJ Services Company
2401 Sivley
Artesia, NM 88210
(505) 746-3140



Received
Hobbs
OCD

Certificate of Analysis

Quanterra Incorporated
5307 Industrial Oaks Boulevard, Suite 160
Austin, Texas 78735

512 892-6684 Direct
512 892-6652 Fax

Quanterra
Environmental Services

ANALYTICAL REPORT

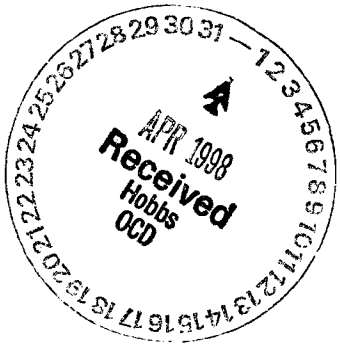
ARTESIA,NM

Lot #: I8B110118

DAVID BURKETT

B.J. Services Company

QUANTERRA INCORPORATED



Sandra L. Green
Project Manager

March 2, 1998

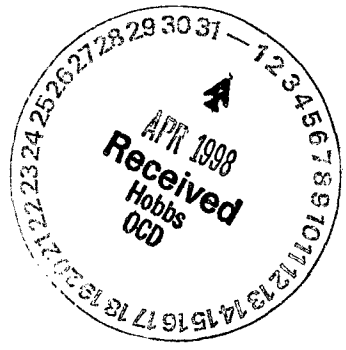
MAR 2009
Received
Hobbs
OCD

Quanterra
Environmental Services

EXECUTIVE SUMMARY - Detection Highlights

I8B110118

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
SHOP DRAIN SLUDGE 02/08/98 14:00 001				
Flashpoint	>150	>150	deg F	SW846 1010
Total Recoverable Petroleum Hydrocarbons	200000	7200	mg/kg	MCAWW 418.1
Corrosivity	7.0	1.0	No Units	SW846 9045A
Percent Moisture	93.0	0.50	%	OCLP OLM03.1



MAR 1999
Received
Hobbs
OCD

Quanterra
Environmental Services

ANALYTICAL METHODS SUMMARY

I8B110118

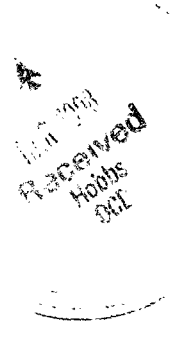
PARAMETER	ANALYTICAL METHOD
% Moisture, Decanted-CLP	OCLP OLM03.1
Corrosivity	SW846 9045A
Mercury in Liquid Waste (Manual Cold-Vapor)	SW846 7470A
Pensky-Martens Method for Determining Ignitability	SW846 1010
Reactive Cyanide	SW846 7.3.3
Reactive Sulfide	SW846 7.3.4
Total Recoverable Petroleum Hydrocarbons	MCAWW 418.1
TCLP BNA's	SW846 8270B
TCLP Metals (ICP)	SW846 6010A
TCLP Volatiles	SW846 8240B

References:

MCAWW "Methods for Chemical Analysis of Water and Wastes", EPA-600/4-79-020, March 1983 and subsequent revisions.

OCLP USEPA Contract Laboratory Program Statement of Work for Organics Analysis, Multi-Media, Multi-Concentration.

SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 and its updates.


Received
Hobbs
OCD

Quanterra
Environmental Services

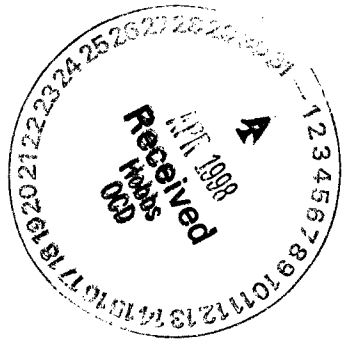
SAMPLE SUMMARY

I8B110118

WO #	SAMPLE#	CLIENT SAMPLE ID	DATE	TIME
CF9W3	001	SHOP DRAIN SLUDGE	02/08/98	14:00

NOTE(S):

- The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit.
- This report must not be reproduced, except in full, without the written approval of the laboratory.
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.



Quanterra
Environmental Services

B.J. SERVICES COMPANY

Client Sample ID: SHOP DRAIN SLUDGE

TCLP GC/MS Semivolatiles

Lot-Sample #...: I8B110118-001 **Work Order #...:** CF9W3107 **Matrix.....:** SOLID
Date Sampled...: 02/08/98 14:00 **Date Received..:** 02/10/98
Leach Date.....: 02/13/98 **Prep Date.....:** 02/17/98 **Analysis Date..:** 02/24/98
Leach Batch #..: P804701 **Prep Batch #...:** 8048208 **Analysis Time..:** 19:47
Dilution Factor: 1
% Moisture.....: 93

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
o-Cresol	ND	0.050	mg/L	SW846 8270B
m-Cresol & p-Cresol	ND	0.10	mg/L	SW846 8270B
1,4-Dichlorobenzene	ND	0.050	mg/L	SW846 8270B
2,4-Dinitrotoluene	ND	0.050	mg/L	SW846 8270B
Hexachlorobenzene	ND	0.050	mg/L	SW846 8270B
Hexachlorobutadiene	ND	0.050	mg/L	SW846 8270B
Hexachloroethane	ND	0.050	mg/L	SW846 8270B
Nitrobenzene	ND	0.050	mg/L	SW846 8270B
Pentachlorophenol	ND	0.25	mg/L	SW846 8270B
Pyridine	ND	0.10	mg/L	SW846 8270B
2,4,5-Trichlorophenol	ND	0.050	mg/L	SW846 8270B
2,4,6-Trichlorophenol	ND	0.050	mg/L	SW846 8270B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2-Fluorophenol	69	(21 - 100)
Phenol-d5	86	(10 - 94)
Nitrobenzene-d5	87	(35 - 114)
2-Fluorobiphenyl	66	(43 - 116)
2,4,6-Tribromophenol	123	(10 - 123)
Terphenyl-d14	111	(33 - 141)

NOTE(S):

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching Procedure Method 1311 (55 FR 26986)

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Environmental Services

B.J. SERVICES COMPANY

Client Sample ID: SHOP DRAIN SLUDGE

TCLP GC/MS Volatiles

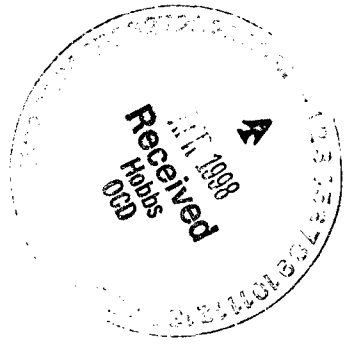
Lot-Sample #...: I8B110118-001 **Work Order #...:** CF9W3108 **Matrix.....:** SOLID
Date Sampled...: 02/08/98 14:00 **Date Received..:** 02/10/98
Leach Date.....: 02/13/98 **Prep Date.....:** 02/18/98 **Analysis Date..:** 02/18/98
Leach Batch #..: P803504 **Prep Batch #...:** 8051263 **Analysis Time..:** 19:16
Dilution Factor: 1
% Moisture.....: 93

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
Benzene	ND	0.050	mg/L	SW846 8240B
Carbon tetrachloride	ND	0.050	mg/L	SW846 8240B
Chlorobenzene	ND	0.050	mg/L	SW846 8240B
Chloroform	ND	0.050	mg/L	SW846 8240B
1,2-Dichloroethane	ND	0.050	mg/L	SW846 8240B
1,1-Dichloroethylene	ND	0.050	mg/L	SW846 8240B
Methyl ethyl ketone	ND	0.20	mg/L	SW846 8240B
Tetrachloroethylene	ND	0.050	mg/L	SW846 8240B
Trichloroethylene	ND	0.050	mg/L	SW846 8240B
Vinyl chloride	ND	0.10	mg/L	SW846 8240B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
4-Bromofluorobenzene	97	(86 - 115)
1,2-Dichloroethane-d4	97	(76 - 114)
Toluene-d8	100	(88 - 110)

NOTE(S):

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching Procedure Method 1311 (55 FR 26986)



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Environmental Services

B.J. SERVICES COMPANY

Client Sample ID: SHOP DRAIN SLUDGE

General Chemistry

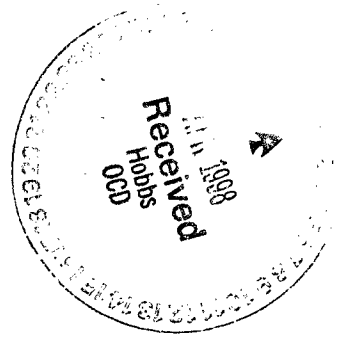
Lot-Sample #...: I8B110118-001 **Work Order #...:** CF9W3 **Matrix.....:** SOLID
Date Sampled...: 02/08/98 14:00 **Date Received..:** 02/10/98
% Moisture.....: 93

PARAMETER	RESULT	RL	UNITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Corrosivity	**7.0**	**1.0**	**No Units**	**SW846 9045A**	**02/16/98**	**8047188**
		Dilution Factor: 1				
		Analysis Time..: 14:00				
Flashpoint	**>150**	**>150**	**deg F**	**SW846 1010**	**02/15-02/16/98**	**8047152**
		Dilution Factor: 1				
		Analysis Time..: 12:00				
Percent Moisture	**93.0**	**0.50**	**%**	**OCLP OLM03.1**	**02/13-02/16/98**	**8044206**
		Dilution Factor: 1				
		Analysis Time..: 17:00				
Reactive Cyanide	ND	2900	mg/kg	SW846 7.3.3	02/13-02/17/98	8044160
		Dilution Factor: 1				
		Analysis Time..: 16:00				
Reactive Sulfide	ND	2900	mg/kg	SW846 7.3.4	02/13/98	8044161
		Dilution Factor: 1				
		Analysis Time..: 00:00				
Total Recoverable Petroleum Hydrocarbons	**200000**	**7200**	**mg/kg**	**MCAWW 418.1**	**02/12-02/16/98**	**8043185**
		Dilution Factor: 50				
		Analysis Time..: 10:00				

NOTE(S):

RL Reporting Limit

Results and reporting limits have been adjusted for dry weight.



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Environmental Services

B.J. SERVICES COMPANY

Client Sample ID: SHOP DRAIN SLUDGE

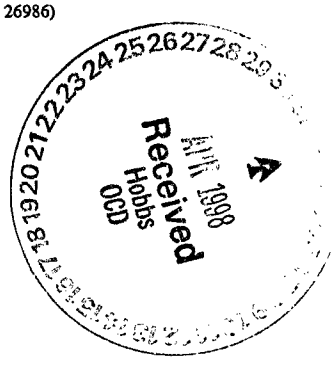
TCLP Metals

Lot-Sample #...: I8B110118-001 **Matrix.....:** SOLID
Date Sampled...: 02/08/98 14:00 **Date Received..:** 02/10/98
Leach Date.....: 02/13/98 **Leach Batch #..:** P804701

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
Prep Batch #...: 8047212						
Silver	ND	0.50	mg/L	SW846 6010A	02/14-02/18/98	CF9W310
		Dilution Factor: 1				
		Analysis Time..: 14:49				
Arsenic	ND	0.50	mg/L	SW846 6010A	02/14-02/18/98	CF9W310
		Dilution Factor: 1				
		Analysis Time..: 14:49				
Barium	ND	10.0	mg/L	SW846 6010A	02/14-02/18/98	CF9W310
		Dilution Factor: 1				
		Analysis Time..: 14:49				
Cadmium	ND	0.10	mg/L	SW846 6010A	02/14-02/18/98	CF9W310
		Dilution Factor: 1				
		Analysis Time..: 14:49				
Chromium	ND	0.50	mg/L	SW846 6010A	02/14-02/18/98	CF9W310
		Dilution Factor: 1				
		Analysis Time..: 14:49				
Lead	ND	0.50	mg/L	SW846 6010A	02/14-02/18/98	CF9W310
		Dilution Factor: 1				
		Analysis Time..: 14:49				
Selenium	ND	0.25	mg/L	SW846 6010A	02/14-02/18/98	CF9W31C
		Dilution Factor: 1				
		Analysis Time..: 14:49				
Prep Batch #...: 8051212						
Mercury	ND	0.0020	mg/L	SW846 7470A	02/20-02/24/98	CF9W31C
		Dilution Factor: 1				
		Analysis Time..: 08:37				

NOTE(S):

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching Procedure Method 1311 (55 FR 26986)



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QC DATA ASSOCIATION SUMMARY

I8B110118

Sample Preparation and Analysis Control Numbers

SAMPLE#	MATRIX	ANALYTICAL METHOD	LEACH BATCH #	PREP BATCH #	MS RUN#
001	SOLID	SW846 1010		8047152	8047082
	SOLID	MCAWW 418.1		8043185	8043079
	SOLID	SW846 6010A	P804701	8047212	8047090
	SOLID	SW846 9045A		8047188	8047076
	SOLID	OCLP OLM03.1		8044206	8044082
	SOLID	SW846 7.3.3		8044160	8044042
	SOLID	SW846 7.3.4		8044161	8044043
	SOLID	SW846 8270B	P804701	8048208	8048081
	SOLID	SW846 8240B	P803504	8051263	8051124
	SOLID	SW846 7470A	P804701	8051212	8051081

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METHOD BLANK REPORT

TCLP GC/MS Semivolatiles

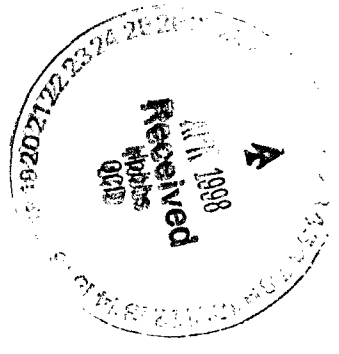
Client Lot #...: I8B110118 **Work Order #...:** CFDN1109 **Matrix.....:** SOLID
MB Lot-Sample #: I8B160000-204
Leach Date.....: 02/13/98 **Prep Date.....:** 02/17/98 **Analysis Date..:** 02/24/98
Leach Batch #..: P804701 **Prep Batch #...:** 8048208 **Analysis Time..:** 18:46
Dilution Factor: 1

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
o-Cresol	ND	0.050	mg/L	SW846 8270B
m-Cresol & p-Cresol	ND	0.10	mg/L	SW846 8270B
1,4-Dichlorobenzene	ND	0.050	mg/L	SW846 8270B
2,4-Dinitrotoluene	ND	0.050	mg/L	SW846 8270B
Hexachlorobenzene	ND	0.050	mg/L	SW846 8270B
Hexachlorobutadiene	ND	0.050	mg/L	SW846 8270B
Hexachloroethane	ND	0.050	mg/L	SW846 8270B
Nitrobenzene	ND	0.050	mg/L	SW846 8270B
Pentachlorophenol	ND	0.25	mg/L	SW846 8270B
Pyridine	ND	0.10	mg/L	SW846 8270B
2,4,5-Trichlorophenol	ND	0.050	mg/L	SW846 8270B
2,4,6-Trichlorophenol	ND	0.050	mg/L	SW846 8270B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2-Fluorophenol	70	(21 - 100)
Phenol-d5	91	(10 - 94)
Nitrobenzene-d5	89	(35 - 114)
2-Fluorobiphenyl	78	(43 - 116)
2,4,6-Tribromophenol	109	(10 - 123)
Terphenyl-d14	127	(33 - 141)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.



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Environmental Services

METHOD BLANK REPORT

GC/MS Volatiles

Client Lot #...: I8B110118 **Work Order #...:** CFGDF101 **Matrix.....:** SOLID
MB Lot-Sample #: I8B200000-263

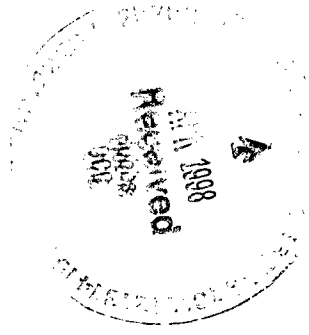
Prep Date.....: 02/18/98 **Analysis Time..:** 13:04
Analysis Date..: 02/18/98 **Prep Batch #...:** 8051263
Dilution Factor: 1

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
Benzene	ND	0.050	mg/L	SW846 8240B
Carbon tetrachloride	ND	0.050	mg/L	SW846 8240B
Chlorobenzene	ND	0.050	mg/L	SW846 8240B
Chloroform	ND	0.050	mg/L	SW846 8240B
1,2-Dichloroethane	ND	0.050	mg/L	SW846 8240B
1,1-Dichloroethylene	ND	0.050	mg/L	SW846 8240B
Methyl ethyl ketone	ND	0.20	mg/L	SW846 8240B
Tetrachloroethylene	ND	0.050	mg/L	SW846 8240B
Trichloroethylene	ND	0.050	mg/L	SW846 8240B
Vinyl chloride	ND	0.10	mg/L	SW846 8240B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
4-Bromofluorobenzene	92	(86 - 115)
1,2-Dichloroethane-d4	94	(76 - 114)
Toluene-d8	99	(88 - 110)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.



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METHOD BLANK REPORT

General Chemistry

Client Lot #...: I8B110118 **Matrix.....:** SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Reactive Cyanide		Work Order #: CFCGJ101		MB Lot-Sample #:	I8B130000-160	
	ND	200	mg/kg	SW846 7.3.3	02/13-02/17/98	8044160
		Dilution Factor: 1				
		Analysis Time..: 16:00				
Reactive Sulfide		Work Order #: CFCGK101		MB Lot-Sample #:	I8B130000-161	
	ND	200	mg/kg	SW846 7.3.4	02/13/98	8044161
		Dilution Factor: 1				
		Analysis Time..: 15:00				
Total Recoverable Petroleum Hydrocarbons		Work Order #: CFAPG101		MB Lot-Sample #:	I8B120000-185	
	ND	10	mg/kg	MCAWW 418.1	02/12-02/16/98	8043185
		Dilution Factor: 1				
		Analysis Time..: 10:00				

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

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Environmental Services

METHOD BLANK REPORT

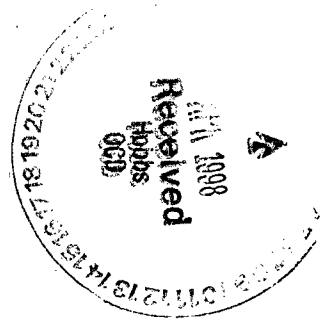
TCLP Metals

Client Lot #...: I8B110118 **Matrix.....:** SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
MB Lot-Sample #: I8B160000-204 **Prep Batch #...:** 8051212						
Leach Date.....: 02/13/98 **Leach Batch #..:** P804701						
Mercury	ND	0.0020	mg/L	SW846 7470A	02/20-02/24/98	CFDN1107
		Dilution Factor: 1				
		Analysis Time..: 08:33				
MB Lot-Sample #: I8B160000-204 **Prep Batch #...:** 8047212						
Leach Date.....: 02/13/98 **Leach Batch #..:** P804701						
Silver	ND	0.50	mg/L	SW846 6010A	02/14-02/18/98	CFDN1108
		Dilution Factor: 1				
		Analysis Time..: 14:44				
Arsenic	ND	0.50	mg/L	SW846 6010A	02/14-02/18/98	CFDN1101
		Dilution Factor: 1				
		Analysis Time..: 14:44				
Barium	ND	10.0	mg/L	SW846 6010A	02/14-02/18/98	CFDN1102
		Dilution Factor: 1				
		Analysis Time..: 14:44				
Cadmium	ND	0.10	mg/L	SW846 6010A	02/14-02/18/98	CFDN1103
		Dilution Factor: 1				
		Analysis Time..: 14:44				
Chromium	ND	0.50	mg/L	SW846 6010A	02/14-02/18/98	CFDN1104
		Dilution Factor: 1				
		Analysis Time..: 14:44				
Lead	ND	0.50	mg/L	SW846 6010A	02/14-02/18/98	CFDN1105
		Dilution Factor: 1				
		Analysis Time..: 14:44				
Selenium	ND	0.25	mg/L	SW846 6010A	02/14-02/18/98	CFDN1106
		Dilution Factor: 1				
		Analysis Time..: 14:44				

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.



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Environmental Services

LABORATORY CONTROL SAMPLE DATA REPORT

GC/MS Semivolatiles

Client Lot #...: I8B110118 **Work Order #...:** CFE2C101 **Matrix.....:** SOLID
LCS Lot-Sample#: I8B170000-208
Prep Date.....: 02/17/98 **Analysis Date..:** 02/24/98
Prep Batch #...: 8048208 **Analysis Time..:** 19:17
Dilution Factor: 1

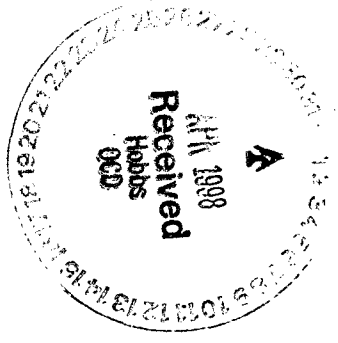
PARAMETER	SPIKE AMOUNT	MEASURED AMOUNT	UNITS	PERCENT RECOVERY	METHOD
Pyridine	**0.40**	**0.27**	**mg/L**	**68**	**SW846 8270B**
1,4-Dichlorobenzene	**0.40**	**0.27**	**mg/L**	**68**	**SW846 8270B**
o-Cresol	**0.40**	**0.33**	**mg/L**	**82**	**SW846 8270B**
m-Cresol & p-Cresol	**0.80**	**0.78**	**mg/L**	**98**	**SW846 8270B**
Hexachloroethane	**0.40**	**0.24**	**mg/L**	**60**	**SW846 8270B**
Nitrobenzene	**0.40**	**0.37**	**mg/L**	**92**	**SW846 8270B**
Hexachlorobutadiene	**0.40**	**0.33**	**mg/L**	**82**	**SW846 8270B**
2,4,6-Trichlorophenol	**0.40**	**0.33**	**mg/L**	**82**	**SW846 8270B**
2,4,5-Trichlorophenol	**0.40**	**0.33**	**mg/L**	**82**	**SW846 8270B**
2,4-Dinitrotoluene	**0.40**	**0.34**	**mg/L**	**85**	**SW846 8270B**
Hexachlorobenzene	**0.40**	**0.42**	**mg/L**	**104**	**SW846 8270B**
Pentachlorophenol	**0.40**	**0.35**	**mg/L**	**87**	**SW846 8270B**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2-Fluorophenol	74	(21 - 100)
Phenol-d5	93	(10 - 94)
Nitrobenzene-d5	91	(35 - 114)
2-Fluorobiphenyl	74	(43 - 116)
2,4,6-Tribromophenol	113	(10 - 123)
Terphenyl-d14	122	(33 - 141)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters



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LABORATORY CONTROL SAMPLE DATA REPORT

GC/MS Volatiles

Client Lot #...: I8B110118 Work Order #...: CFGDF102 Matrix.....: SOLID
LCS Lot-Sample#: I8B200000-263
Prep Date.....: 02/18/98 Analysis Date..: 02/18/98
Prep Batch #...: 8051263 Analysis Time..: 13:35
Dilution Factor: 1

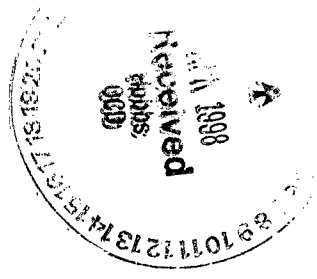
PARAMETER	SPIKE AMOUNT	MEASURED AMOUNT	UNITS	PERCENT RECOVERY	METHOD
Vinyl chloride	**0.50**	**0.61**	**mg/L**	**122**	**SW846 8240B**
1,1-Dichloroethylene	**0.50**	**0.52**	**mg/L**	**103**	**SW846 8240B**
Chloroform	**0.50**	**0.49**	**mg/L**	**98**	**SW846 8240B**
1,2-Dichloroethane	**0.50**	**0.52**	**mg/L**	**104**	**SW846 8240B**
Methyl ethyl ketone	**0.50**	**0.39**	**mg/L**	**78**	**SW846 8240B**
Carbon tetrachloride	**0.50**	**0.41**	**mg/L**	**83**	**SW846 8240B**
Trichloroethylene	**0.50**	**0.47**	**mg/L**	**95**	**SW846 8240B**
Benzene	**0.50**	**0.48**	**mg/L**	**95**	**SW846 8240B**
Tetrachloroethylene	**0.50**	**0.49**	**mg/L**	**98**	**SW846 8240B**
Chlorobenzene	**0.50**	**0.49**	**mg/L**	**98**	**SW846 8240B**
1,4-Dichlorobenzene	**0.50**	**0.45**	**mg/L**	**91**	**SW846 8240B**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
4-Bromofluorobenzene	92	(86 - 115)
1,2-Dichloroethane-d4	102	(76 - 114)
Toluene-d8	98	(88 - 110)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters



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LABORATORY CONTROL SAMPLE DATA REPORT

General Chemistry

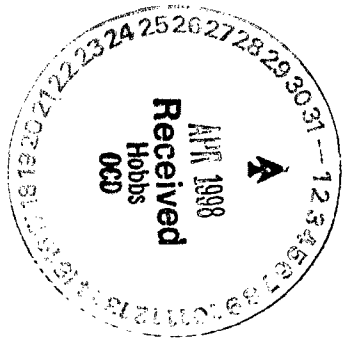
Client Lot #...: I8B110118 **Matrix.....:** SOLID

PARAMETER	SPIKE AMOUNT	MEASURED AMOUNT	UNITS	PERCNT RECVRY	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Corrosivity			Work Order #: CFDLG101 LCS Lot-Sample#: I8B160000-188				
	9.0	9.2	No Units	101	SW846 9045A	02/16/98	8047188
			Dilution Factor: 1				
			Analysis Time..: 14:00				
Flashpoint			Work Order #: CFDMP101 LCS Lot-Sample#: I8B160000-152				
	81	81	deg F	100	SW846 1010	02/15-02/16/98	8047152
			Dilution Factor: 1				
			Analysis Time..: 10:00				
Reactive Cyanide			Work Order #: CFCGJ102 LCS Lot-Sample#: I8B130000-160				
	40	1.6	mg/kg	3.9	SW846 7.3.3	02/13-02/17/98	8044160
			Dilution Factor: 1				
			Analysis Time..: 16:00				
Total Recoverable Petroleum Hydrocarbons			Work Order #: CFAPG102 LCS Lot-Sample#: I8B120000-185				
	250	180	mg/kg	74	MCAWW 418.1	02/12-02/16/98	8043185
			Dilution Factor: 1				
			Analysis Time..: 10:00				

Seepage 20 mg/k

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.



Quanterra
Environmental Services

LABORATORY CONTROL SAMPLE DATA REPORT

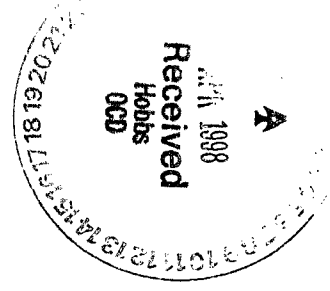
TCLP Metals

Client Lot #...: I8B110118 **Matrix.....:** SOLID

PARAMETER	SPIKE AMOUNT	MEASURED AMOUNT	UNITS	PERCNT RECVRY	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
LCS Lot-Sample#: I8B160000-212 **Prep Batch #...:** 8047212							
Arsenic	2.0	2.0	mg/L	100	SW846 6010A	02/14-02/18/98	CFDN6101
			Dilution Factor: 1				
			Analysis Time..: 14:46				
Barium	2.0	2.0	mg/L	101	SW846 6010A	02/14-02/18/98	CFDN6102
			Dilution Factor: 1				
			Analysis Time..: 14:46				
Cadmium	0.050	0.056	mg/L	112	SW846 6010A	02/14-02/18/98	CFDN6103
			Dilution Factor: 1				
			Analysis Time..: 14:46				
Chromium	0.20	0.20	mg/L	98	SW846 6010A	02/14-02/18/98	CFDN6104
			Dilution Factor: 1				
			Analysis Time..: 14:46				
Lead	0.50	0.51	mg/L	102	SW846 6010A	02/14-02/18/98	CFDN6105
			Dilution Factor: 1				
			Analysis Time..: 14:46				
Selenium	2.0	2.0	mg/L	101	SW846 6010A	02/14-02/18/98	CFDN6106
			Dilution Factor: 1				
			Analysis Time..: 14:46				
Silver	0.050	0.040	mg/L	81	SW846 6010A	02/14-02/18/98	CFDN6107
			Dilution Factor: 1				
			Analysis Time..: 14:46				
LCS Lot-Sample#: I8B200000-212 **Prep Batch #...:** 8051212							
Mercury	0.0050	0.0047	mg/L	94	SW846 7470A	02/20-02/24/98	CFG88101
			Dilution Factor: 1				
			Analysis Time..: 08:35				

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.



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LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC/MS Semivolatiles

Client Lot #...: I8B110118 **Work Order #...:** CFE2C101 **Matrix.....:** SOLID
LCS Lot-Sample#: I8B170000-208
Prep Date.....: 02/17/98 **Analysis Date..:** 02/24/98
Prep Batch #...: 8048208 **Analysis Time..:** 19:17
Dilution Factor: 1

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	METHOD
Pyridine	**68**	**(1.0- 144)**	**SW846 8270B**
1,4-Dichlorobenzene	**68**	**(26 - 112)**	**SW846 8270B**
o-Cresol	**82**	**(21 - 137)**	**SW846 8270B**
m-Cresol & p-Cresol	**98**	**(19 - 126)**	**SW846 8270B**
Hexachloroethane	**60**	**(26 - 102)**	**SW846 8270B**
Nitrobenzene	**92**	**(42 - 120)**	**SW846 8270B**
Hexachlorobutadiene	**82**	**(33 - 111)**	**SW846 8270B**
2,4,6-Trichlorophenol	**82**	**(19 - 122)**	**SW846 8270B**
2,4,5-Trichlorophenol	**82**	**(29 - 123)**	**SW846 8270B**
2,4-Dinitrotoluene	**85**	**(31 - 106)**	**SW846 8270B**
Hexachlorobenzene	**104**	**(42 - 120)**	**SW846 8270B**
Pentachlorophenol	**87**	**(12 - 156)**	**SW846 8270B**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2-Fluorophenol	74	(21 - 100)
Phenol-d5	93	(10 - 94)
Nitrobenzene-d5	91	(35 - 114)
2-Fluorobiphenyl	74	(43 - 116)
2,4,6-Tribromophenol	113	(10 - 123)
Terphenyl-d14	122	(33 - 141)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

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LABORATORY CONTROL SAMPLE EVALUATION RREPORT

GC/MS Volatiles

Client Lot #...: I8B110118 **Work Order #...:** CFGDF102 **Matrix.....:** SOLID
LCS Lot-Sample#: I8B200000-263
Prep Date.....: 02/18/98 **Analysis Date..:** 02/18/98
Prep Batch #...: 8051263 **Analysis Time..:** 13:35
Dilution Factor: 1

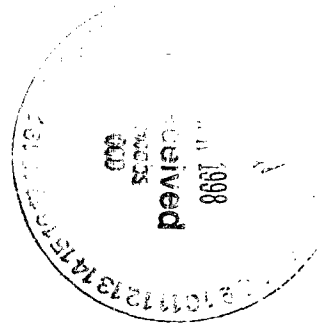
PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	METHOD
Vinyl chloride	**122**	**(1.0- 251)**	**SW846 8240B**
1,1-Dichloroethylene	**103**	**(59 - 155)**	**SW846 8240B**
Chloroform	**98**	**(51 - 136)**	**SW846 8240B**
1,2-Dichloroethane	**104**	**(49 - 155)**	**SW846 8240B**
Methyl ethyl ketone	**78**	**(25 - 250)**	**SW846 8240B**
Carbon tetrachloride	**83**	**(71 - 240)**	**SW846 8240B**
Trichloroethylene	**95**	**(71 - 157)**	**SW846 8240B**
Benzene	**95**	**(37 - 151)**	**SW846 8240B**
Tetrachloroethylene	**98**	**(46 - 157)**	**SW846 8240B**
Chlorobenzene	**98**	**(37 - 160)**	**SW846 8240B**
1,4-Dichlorobenzene	**91**	**(75 - 137)**	**SW846 8240B**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
4-Bromofluorobenzene	92	(86 - 115)
1,2-Dichloroethane-d4	102	(76 - 114)
Toluene-d8	98	(88 - 110)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters



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LABORATORY CONTROL SAMPLE EVALUATION REPORT

General Chemistry

Client Lot #...: I8B110118 **Matrix.....:** SOLID

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Corrosivity		Work Order #: CFDLG101	LCS Lot-Sample#: I8B160000-188		
	101	(90 - 110)	SW846 9045A	02/16/98	8047188
		Dilution Factor: 1			
		Analysis Time..: 14:00			
Flashpoint		Work Order #: CFDMP101	LCS Lot-Sample#: I8B160000-152		
	100	(95 - 105)	SW846 1010	02/15-02/16/98	8047152
		Dilution Factor: 1			
		Analysis Time..: 10:00			
Reactive Cyanide		Work Order #: CFCGJ102	LCS Lot-Sample#: I8B130000-160		
	3.9	(1.0- 64)	SW846 7.3.3	02/13-02/17/98	8044160
		Dilution Factor: 1			
		Analysis Time..: 16:00			
Total Recoverable Petroleum Hydrocarbons		Work Order #: CFAPG102	LCS Lot-Sample#: I8B120000-185		
	74	(70 - 130)	MCAWW 418.1	02/12-02/16/98	8043185
		Dilution Factor: 1			
		Analysis Time..: 10:00			

ok mjk

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

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LABORATORY CONTROL SAMPLE EVALUATION REPORT

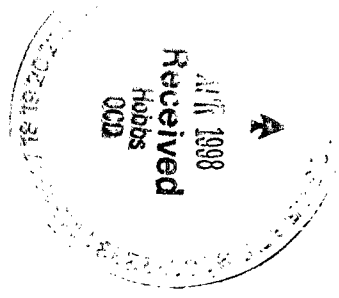
TCLP Metals

Client Lot #...: I8B110118 **Matrix.....:** SOLID

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
LCS Lot-Sample#: I8B160000-212 **Prep Batch #...:** 8047212					
Arsenic	100	(80 - 120)	SW846 6010A Dilution Factor: 1 Analysis Time..: 14:46	02/14-02/18/98	CFDN6101
Barium	101	(80 - 120)	SW846 6010A Dilution Factor: 1 Analysis Time..: 14:46	02/14-02/18/98	CFDN6102
Cadmium	112	(80 - 120)	SW846 6010A Dilution Factor: 1 Analysis Time..: 14:46	02/14-02/18/98	CFDN6103
Chromium	98	(80 - 120)	SW846 6010A Dilution Factor: 1 Analysis Time..: 14:46	02/14-02/18/98	CFDN6104
Lead	102	(80 - 120)	SW846 6010A Dilution Factor: 1 Analysis Time..: 14:46	02/14-02/18/98	CFDN6105
Selenium	101	(80 - 120)	SW846 6010A Dilution Factor: 1 Analysis Time..: 14:46	02/14-02/18/98	CFDN6106
Silver	81	(80 - 120)	SW846 6010A Dilution Factor: 1 Analysis Time..: 14:46	02/14-02/18/98	CFDN6107
LCS Lot-Sample#: I8B200000-212 **Prep Batch #...:** 8051212					
Mercury	94	(80 - 120)	SW846 7470A Dilution Factor: 1 Analysis Time..: 08:35	02/20-02/24/98	CFG88101

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.



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Environmental Services

MATRIX SPIKE SAMPLE DATA REPORT

TCLP GC/MS Volatiles

Client Lot #...: I8B110118 Work Order #...: CF6FF117-MS Matrix.....: SOLID
MS Lot-Sample #: I8B030109-001 CF6FF118-MSD
Date Sampled...: 02/02/98 00:00 Date Received..: 02/03/98
Leach Date.....: 02/13/98 Prep Date.....: 02/18/98 Analysis Date..: 02/18/98
Leach Batch #..: P803504 Prep Batch #...: 8051263 Analysis Time..: 17:45
Dilution Factor: 1

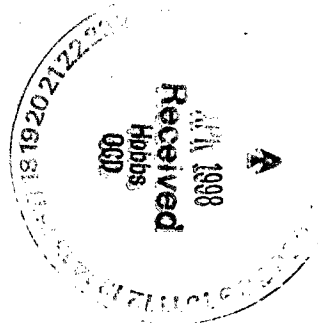
PARAMETER	SAMPLE AMOUNT	SPIKE AMT	MEASRD AMOUNT	UNITS	PERCENT RECOVERY	RPD	METHOD
Vinyl chloride	**ND**	**0.50**	**0.60**	**mg/L**	**119**		**SW846 8240B**
	ND	**0.50**	**0.62**	**mg/L**	**125**	**4.4**	**SW846 8240B**
1,1-Dichloroethylene	**ND**	**0.50**	**0.52**	**mg/L**	**104**		**SW846 8240B**
	ND	**0.50**	**0.54**	**mg/L**	**108**	**3.4**	**SW846 8240B**
Chloroform	**ND**	**0.50**	**0.50**	**mg/L**	**101**		**SW846 8240B**
	ND	**0.50**	**0.51**	**mg/L**	**103**	**1.7**	**SW846 8240B**
1,2-Dichloroethane	**ND**	**0.50**	**0.52**	**mg/L**	**104**		**SW846 8240B**
	ND	**0.50**	**0.53**	**mg/L**	**106**	**2.3**	**SW846 8240B**
Methyl ethyl ketone	**ND**	**0.50**	**0.34**	**mg/L**	**67**		**SW846 8240B**
	ND	**0.50**	**0.41**	**mg/L**	**82**	**20**	**SW846 8240B**
Carbon tetrachloride	**ND**	**0.50**	**0.41**	**mg/L**	**82**		**SW846 8240B**
	ND	**0.50**	**0.43**	**mg/L**	**87**	**6.1**	**SW846 8240B**
Trichloroethylene	**ND**	**0.50**	**0.46**	**mg/L**	**93**		**SW846 8240B**
	ND	**0.50**	**0.50**	**mg/L**	**99**	**6.6**	**SW846 8240B**
Benzene	**ND**	**0.50**	**0.48**	**mg/L**	**93**		**SW846 8240B**
	ND	**0.50**	**0.51**	**mg/L**	**100**	**7.0**	**SW846 8240B**
Tetrachloroethylene	**ND**	**0.50**	**0.49**	**mg/L**	**97**		**SW846 8240B**
	ND	**0.50**	**0.53**	**mg/L**	**107**	**9.4**	**SW846 8240B**
Chlorobenzene	**ND**	**0.50**	**0.49**	**mg/L**	**98**		**SW846 8240B**
	ND	**0.50**	**0.51**	**mg/L**	**103**	**5.0**	**SW846 8240B**
1,4-Dichlorobenzene	**ND**	**0.50**	**0.46**	**mg/L**	**91**		**SW846 8240B**
	ND	**0.50**	**0.49**	**mg/L**	**98**	**7.7**	**SW846 8240B**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
4-Bromofluorobenzene	95	(86 - 115)
	93	(86 - 115)
1,2-Dichloroethane-d4	104	(76 - 114)
	101	(76 - 114)
Toluene-d8	99	(88 - 110)
	98	(88 - 110)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters



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Environmental Services

MATRIX SPIKE SAMPLE DATA REPORT

TCLP Metals

Client Lot #...: I8B110118 **Matrix.....:** SOLID
Date Sampled...: 02/03/98 13:00 **Date Received..:** 02/04/98

PARAMETER	SAMPLE AMOUNT	SPIKE AMT	MEASURED AMOUNT	UNITS	PERCNT RECVRY	RPD	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
MS Lot-Sample #: I8B110118-001 **Prep Batch #...:** 8047212									
Leach Date.....: 02/13/98 **Leach Batch #..:** P804701									
Silver									
	ND	1.0	0.98	mg/L	98		SW846 6010A	02/14-02/18/98	CF9W3114
	ND	1.0	0.95	mg/L	95	2.8	SW846 6010A	02/14-02/18/98	CF9W3115
				Dilution Factor: 1					
				Analysis Time..: 14:59					
Arsenic									
	ND	5.0	5.0	mg/L	101		SW846 6010A	02/14-02/18/98	CF9W310P
	ND	5.0	4.9	mg/L	98	3.0	SW846 6010A	02/14-02/18/98	CF9W310Q
				Dilution Factor: 1					
				Analysis Time..: 14:59					
Barium									
	ND	50.0	53.0	mg/L	102		SW846 6010A	02/14-02/18/98	CF9W310R
	ND	50.0	51.0	mg/L	98	3.9	SW846 6010A	02/14-02/18/98	CF9W310T
				Dilution Factor: 1					
				Analysis Time..: 14:59					
Cadmium									
	ND	1.0	0.97	mg/L	97		SW846 6010A	02/14-02/18/98	CF9W310U
	ND	1.0	0.94	mg/L	94	3.3	SW846 6010A	02/14-02/18/98	CF9W310V
				Dilution Factor: 1					
				Analysis Time..: 14:59					
Chromium									
	ND	5.0	4.8	mg/L	96		SW846 6010A	02/14-02/18/98	CF9W310W
	ND	5.0	4.6	mg/L	93	3.9	SW846 6010A	02/14-02/18/98	CF9W310X
				Dilution Factor: 1					
				Analysis Time..: 14:59					
Lead									
	ND	5.0	4.9	mg/L	98		SW846 6010A	02/14-02/18/98	CF9W3110
	ND	5.0	4.7	mg/L	94	4.1	SW846 6010A	02/14-02/18/98	CF9W3111
				Dilution Factor: 1					
				Analysis Time..: 14:59					
Selenium									
	ND	1.0	0.98	mg/L	98		SW846 6010A	02/14-02/18/98	CF9W3112
	ND	1.0	0.95	mg/L	95	2.9	SW846 6010A	02/14-02/18/98	CF9W3113
				Dilution Factor: 1					
				Analysis Time..: 14:59					

MS Lot-Sample #: I8B110118-001 **Prep Batch #...:** 8051212
Leach Date.....: 02/13/98 **Leach Batch #..:** P804701
(Continued on next page)

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MATRIX SPIKE SAMPLE DATA REPORT

TCLP Metals

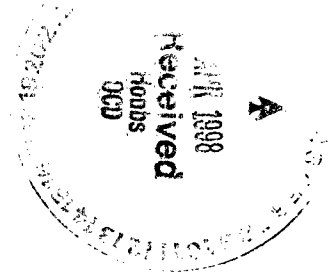
Client Lot #...: I8B110118 **Matrix.....:** SOLID
Date Sampled...: 02/03/98 13:00 **Date Received..:** 02/04/98

PARAMETER	SAMPLE AMOUNT	SPIKE AMT	MEASURED AMOUNT	UNITS	PERCNT RECVRY	RPD	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
Mercury									
	ND	0.001	0.00080	mg/L	80		SW846 7470A	02/20-02/24/98	CF9W3118
	ND	0.001	0.00097	mg/L	97	20	SW846 7470A	02/20-02/24/98	CF9W3119

Dilution Factor: 1
Analysis Time..: 08:40

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.



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Environmental Services

MATRIX SPIKE SAMPLE DATA REPORT

TCLP GC/MS Semivolatiles

Client Lot #...: I8B110118 Work Order #...: CF9W3116-MS Matrix.....: SOLID
MS Lot-Sample #: I8B110118-001 CF9W3117-MSD
Date Sampled...: 02/08/98 14:00 Date Received..: 02/10/98
Leach Date.....: 02/13/98 Prep Date.....: 02/17/98 Analysis Date..: 02/27/98
Leach Batch #..: P804701 Prep Batch #...: 8048208 Analysis Time..: 09:36
Dilution Factor: 1

PARAMETER	SAMPLE AMOUNT	SPIKE AMT	MEASRD AMOUNT	UNITS	PERCENT RECOVERY	RPD	METHOD
o-Cresol	ND	0.40	0.32	mg/L	80		SW846 8270B
	ND	0.40	0.27	mg/L	67	18	SW846 8270B
m-Cresol & p-Cresol	ND	0.80	0.77	mg/L	93		SW846 8270B
	ND	0.80	0.62	mg/L	74	22	SW846 8270B
1,4-Dichlorobenzene	ND	0.40	0.24	mg/L	59		SW846 8270B
	ND	0.40	0.17	mg/L	43	30	SW846 8270B
2,4-Dinitrotoluene	ND	0.40	0.28	mg/L	70		SW846 8270B
	ND	0.40	0.23	mg/L	58	19	SW846 8270B
Hexachlorobenzene	ND	0.40	0.30	mg/L	74		SW846 8270B
	ND	0.40	0.21	mg/L	53	33	SW846 8270B
Hexachlorobutadiene	ND	0.40	0.25	mg/L	61		SW846 8270B
	ND	0.40	0.19	mg/L	48	25	SW846 8270B
Hexachloroethane	ND	0.40	0.27	mg/L	66		SW846 8270B
	ND	0.40	0.20	mg/L	51	27	SW846 8270B
Nitrobenzene	ND	0.40	0.27	mg/L	68		SW846 8270B
	ND	0.40	0.23	mg/L	57	18	SW846 8270B
Pentachlorophenol	ND	0.40	0.34	mg/L	86		SW846 8270B
	ND	0.40	0.23	mg/L	57	39	SW846 8270B
Pyridine	ND	0.40	0.29	mg/L	74		SW846 8270B
	ND	0.40	0.25	mg/L	62	17	SW846 8270B
2,4,5-Trichlorophenol	ND	0.40	0.36	mg/L	91		SW846 8270B
	ND	0.40	0.24	mg/L	59	42	SW846 8270B
2,4,6-Trichlorophenol	ND	0.40	0.29	mg/L	73		SW846 8270B
	ND	0.40	0.20	mg/L	50	38	SW846 8270B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2-Fluorophenol	71	(21 - 100)
	60	(21 - 100)
Phenol-d5	83	(10 - 94)
	71	(10 - 94)
Nitrobenzene-d5	64	(35 - 114)
	56	(35 - 114)
2-Fluorobiphenyl	74	(43 - 116)
	47	(43 - 116)
2,4,6-Tribromophenol	98	(10 - 123)
	70	(10 - 123)
Terphenyl-d14	81	(33 - 141)
	59	(33 - 141)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

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Environmental Services

MATRIX SPIKE SAMPLE DATA REPORT

General Chemistry

Client Lot #...: I8B110118 **Matrix.....:** SOLID
Date Sampled...: 02/03/98 13:00 **Date Received..:** 02/04/98

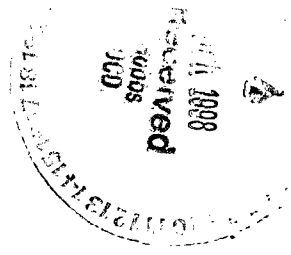
PARAMETER	SAMPLE AMOUNT	SPIKE AMT	MEASURED AMOUNT	UNITS	PERCNT RECVRY	RPD	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH
Reactive Cyanide			WO#: CF9W310K-MS/CF9W310L-MSD				MS Lot-Sample #: I8B110118-001		
	ND	570	49	mg/kg	8.6		SW846 7.3.3	02/13-02/17/98	804416
	ND	570	49	mg/kg	8.6	0.32	SW846 7.3.3	02/13-02/17/98	804416
			Dilution Factor: 1						
			Analysis Time..: 16:00						
Total Recoverable Petroleum Hydrocarbons			WO#: CF6XV112-MS/CF6XV113-MSD				MS Lot-Sample #: I8B040112-001		
	1200	250	1400 NC	mg/kg			MCAWW 418.1	02/12-02/16/98	804318
	1200	250	1300 NC	mg/kg			MCAWW 418.1	02/12-02/16/98	804318
			Dilution Factor: 1						
			Analysis Time..: 10:00						

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Results and reporting limits have been adjusted for dry weight.

NC The recovery and RPD were not calculated.



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MATRIX SPIKE SAMPLE EVALUATION REPORT

TCLP GC/MS Volatiles

Client Lot #...:	I8B110118	**Work Order #...:**	CF6FF117-MS	**Matrix.....:**	SOLID
MS Lot-Sample #:	I8B030109-001		CF6FF118-MSD		
Date Sampled...:	02/02/98 00:00	**Date Received..:**	02/03/98		
Leach Date.....:	02/13/98	**Prep Date.....:**	02/18/98	**Analysis Date..:**	02/18/98
Leach Batch #..:	P803504	**Prep Batch #...:**	8051263	**Analysis Time..:**	17:45
Dilution Factor:	1				

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD
Vinyl chloride	**119**	**(1.0- 251)**			**SW846 8240B**
	125	**(1.0- 251)**	**4.4**	**(0-30)**	**SW846 8240B**
1,1-Dichloroethylene	**104**	**(59 - 155)**			**SW846 8240B**
	108	**(59 - 155)**	**3.4**	**(0-30)**	**SW846 8240B**
Chloroform	**101**	**(51 - 136)**			**SW846 8240B**
	103	**(51 - 136)**	**1.7**	**(0-30)**	**SW846 8240B**
1,2-Dichloroethane	**104**	**(49 - 155)**			**SW846 8240B**
	106	**(49 - 155)**	**2.3**	**(0-30)**	**SW846 8240B**
Methyl ethyl ketone	**67**	**(25 - 250)**			**SW846 8240B**
	82	**(25 - 250)**	**20**	**(0-30)**	**SW846 8240B**
Carbon tetrachloride	**82**	**(71 - 240)**			**SW846 8240B**
	87	**(71 - 240)**	**6.1**	**(0-30)**	**SW846 8240B**
Trichloroethylene	**93**	**(71 - 157)**			**SW846 8240B**
	99	**(71 - 157)**	**6.6**	**(0-30)**	**SW846 8240B**
Benzene	**93**	**(37 - 151)**			**SW846 8240B**
	100	**(37 - 151)**	**7.0**	**(0-30)**	**SW846 8240B**
Tetrachloroethylene	**97**	**(46 - 157)**			**SW846 8240B**
	107	**(46 - 157)**	**9.4**	**(0-30)**	**SW846 8240B**
Chlorobenzene	**98**	**(37 - 160)**			**SW846 8240B**
	103	**(37 - 160)**	**5.0**	**(0-30)**	**SW846 8240B**
1,4-Dichlorobenzene	**91**	**(75 - 137)**			**SW846 8240B**
	98	**(75 - 137)**	**7.7**	**(0-30)**	**SW846 8240B**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
4-Bromofluorobenzene	95	(86 - 115)
	93	(86 - 115)
1,2-Dichloroethane-d4	104	(76 - 114)
	101	(76 - 114)
Toluene-d8	99	(88 - 110)
	98	(88 - 110)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

Quanterra
Environmental Services

MATRIX SPIKE SAMPLE EVALUATION REPORT

TCLP Metals

Client Lot #...: I8B110118 **Matrix.....:** SOLID
Date Sampled...: 02/03/98 13:00 **Date Received..:** 02/04/98

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
MS Lot-Sample #: I8B110118-001 **Prep Batch #...:** 8047212							
Leach Date.....: 02/13/98 **Leach Batch #..:** P804701							
Silver	98	(80 - 120)			SW846 6010A	02/14-02/18/98	CF9W3114
	95	(80 - 120)	2.8	(0-20)	SW846 6010A	02/14-02/18/98	CF9W3115
		Dilution Factor: 1					
		Analysis Time..: 14:59					
Arsenic	101	(80 - 120)			SW846 6010A	02/14-02/18/98	CF9W310P
	98	(80 - 120)	3.0	(0-20)	SW846 6010A	02/14-02/18/98	CF9W310Q
		Dilution Factor: 1					
		Analysis Time..: 14:59					
Barium	102	(80 - 120)			SW846 6010A	02/14-02/18/98	CF9W310R
	98	(80 - 120)	3.9	(0-20)	SW846 6010A	02/14-02/18/98	CF9W310T
		Dilution Factor: 1					
		Analysis Time..: 14:59					
Cadmium	97	(80 - 120)			SW846 6010A	02/14-02/18/98	CF9W310U
	94	(80 - 120)	3.3	(0-20)	SW846 6010A	02/14-02/18/98	CF9W310V
		Dilution Factor: 1					
		Analysis Time..: 14:59					
Chromium	96	(80 - 120)			SW846 6010A	02/14-02/18/98	CF9W310W
	93	(80 - 120)	3.9	(0-20)	SW846 6010A	02/14-02/18/98	CF9W310X
		Dilution Factor: 1					
		Analysis Time..: 14:59					
Lead	98	(80 - 120)			SW846 6010A	02/14-02/18/98	CF9W3110
	94	(80 - 120)	4.1	(0-20)	SW846 6010A	02/14-02/18/98	CF9W3111
		Dilution Factor: 1					
		Analysis Time..: 14:59					
Selenium	98	(80 - 120)			SW846 6010A	02/14-02/18/98	CF9W3112
	95	(80 - 120)	2.9	(0-20)	SW846 6010A	02/14-02/18/98	CF9W3113
		Dilution Factor: 1					
		Analysis Time..: 14:59					
MS Lot-Sample #: I8B110118-001 **Prep Batch #...:** 8051212							
Leach Date.....: 02/13/98 **Leach Batch #..:** P804701							
Mercury	80	(75 - 125)			SW846 7470A	02/20-02/24/98	CF9W3118
	97	(75 - 125)	20	(0-20)	SW846 7470A	02/20-02/24/98	CF9W3119
		Dilution Factor: 1					
		Analysis Time..: 08:40					

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Quanterra
Environmental Services

MATRIX SPIKE SAMPLE EVALUATION REPORT

TCLP GC/MS Semivolatiles

Client Lot #...:	I8B110118	**Work Order #...:**	CF9W3116-MS	**Matrix.....:**	SOLID
MS Lot-Sample #:	I8B110118-001		CF9W3117-MSD		
Date Sampled...:	02/08/98 14:00	**Date Received..:**	02/10/98		
Leach Date.....:	02/13/98	**Prep Date.....:**	02/17/98	**Analysis Date..:**	02/27/98
Leach Batch #..:	P804701	**Prep Batch #...:**	8048208	**Analysis Time..:**	09:36
Dilution Factor:	1				

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD
o-Cresol	**80**	**(21 - 137)**			**SW846 8270B**
	67	**(21 - 137)**	**18**	**(0-70)**	**SW846 8270B**
m-Cresol & p-Cresol	**93**	**(19 - 126)**			**SW846 8270B**
	74	**(19 - 126)**	**22**	**(0-94)**	**SW846 8270B**
1,4-Dichlorobenzene	**59**	**(26 - 112)**			**SW846 8270B**
	43	**(26 - 112)**	**30**	**(0-40)**	**SW846 8270B**
2,4-Dinitrotoluene	**70**	**(31 - 106)**			**SW846 8270B**
	58	**(31 - 106)**	**19**	**(0-55)**	**SW846 8270B**
Hexachlorobenzene	**74**	**(42 - 120)**			**SW846 8270B**
	53	**(42 - 120)**	**33**	**(0-39)**	**SW846 8270B**
Hexachlorobutadiene	**61**	**(33 - 111)**			**SW846 8270B**
	48	**(33 - 111)**	**25**	**(0-40)**	**SW846 8270B**
Hexachloroethane	**66**	**(26 - 102)**			**SW846 8270B**
	51	**(26 - 102)**	**27**	**(0-44)**	**SW846 8270B**
Nitrobenzene	**68**	**(42 - 120)**			**SW846 8270B**
	57	**(42 - 120)**	**18**	**(0-40)**	**SW846 8270B**
Pentachlorophenol	**86**	**(12 - 156)**			**SW846 8270B**
	57	**(12 - 156)**	**39**	**(0-76)**	**SW846 8270B**
Pyridine	**74**	**(1.0- 144)**			**SW846 8270B**
	62	**(1.0- 144)**	**17**	**(0-95)**	**SW846 8270B**
2,4,5-Trichlorophenol	**91**	**(29 - 123)**			**SW846 8270B**
	59	**(29 - 123)**	**42**	**(0-63)**	**SW846 8270B**
2,4,6-Trichlorophenol	**73**	**(19 - 122)**			**SW846 8270B**
	50	**(19 - 122)**	**38**	**(0-64)**	**SW846 8270B**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2-Fluorophenol	71	(21 - 100)
	60	(21 - 100)
Phenol-d5	83	(10 - 94)
	71	(10 - 94)
Nitrobenzene-d5	64	(35 - 114)
	56	(35 - 114)
2-Fluorobiphenyl	74	(43 - 116)
	47	(43 - 116)
2,4,6-Tribromophenol	98	(10 - 123)
	70	(10 - 123)
Terphenyl-d14	81	(33 - 141)
	59	(33 - 141)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

Received MAR 10 1998 Accounts Payable

Quanterra
Environmental Services

MATRIX SPIKE SAMPLE EVALUATION REPORT

General Chemistry

Client Lot #...: I8B110118 **Matrix.....:** SOLID
Date Sampled...: 02/03/98 13:00 **Date Received..:** 02/04/98

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Reactive Cyanide		WO#: CF9W310K-MS/CF9W310L-MSD				MS Lot-Sample #: I8B110118-001	
	8.6	(1.0 - 64)			SW846 7.3.3	02/13-02/17/98	8044160
	8.6	(1.0 - 64)	0.32	(0-213)	SW846 7.3.3	02/13-02/17/98	8044160
		Dilution Factor: 1					
		Analysis Time..: 16:00					
Total Recoverable Petroleum Hydrocarbons		WO#: CF6XV112-MS/CF6XV113-MSD				MS Lot-Sample #: I8B040112-001	
	NC	(70 - 130)			MCAWW 418.1	02/12-02/16/98	8043185
	NC	(70 - 130)		(0-30)	MCAWW 418.1	02/12-02/16/98	8043185
		Dilution Factor: 1					
		Analysis Time..: 10:00					

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Results and reporting limits have been adjusted for dry weight.

NC The recovery and RPD were not calculated.

Quanterra
Environmental Services

SAMPLE DUPLICATE EVALUATION REPORT

General Chemistry

Client Lot #...: I8B110118 **Work Order #...:** CFA6C-SMP CFA6C-DUP **Matrix.....:** SOLID

Date Sampled...: 02/10/98 11:30 **Date Received..:** 02/10/98

% Moisture.....: 30

PARAM	RESULT	DUPLICATE RESULT	UNITS	RPD	RPD LIMIT	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Percent Moisture						SD Lot-Sample #:	I8B110159-001	
	30.0	30.6	%	2.0	(0-14)	OCLP OLM03.1	02/13-02/16/98	8044206

Dilution Factor: 1
Analysis Time..: 00:00

Received
1998

Quanterra
Environmental Services

SAMPLE DUPLICATE EVALUATION REPORT

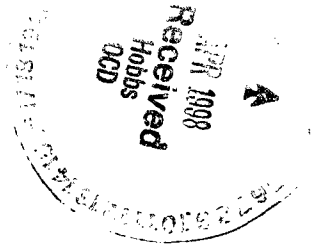
General Chemistry

Client Lot #...: I8B110118 **Work Order #...:** CFD2Q-SMP CFD2Q-DUP **Matrix.....:** SOLID

Date Sampled...: 02/13/98 09:00 **Date Received..:** 02/13/98

% Moisture.....: 0.0

PARAM	RESULT	DUPLICATE RESULT	UNITS	RPD	RPD LIMIT	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Flashpoint						SD Lot-Sample #:	I8B140105-001	
	>150	>150	deg F	0.0	(0-20)	SW846 1010	02/15-02/16/98	8047152
		Dilution Factor: 1						
		Analysis Time..: 00:00						
Corrosivity						SD Lot-Sample #:	I8B140105-001	
	6.5	6.4	No Units	0.62	(0-20)	SW846 9045A	02/16/98/16/98	8047188
		Dilution Factor: 1						
		Analysis Time..: 00:00						



Quanterra
Environmental Services

SAMPLE DUPLICATE EVALUATION REPORT

General Chemistry

Client Lot #...: I8B110118 **Work Order #...:** CF9W3-SMP **Matrix.....:** SOLID
CF9W3-DUP
Date Sampled...: 02/08/98 14:00 **Date Received..:** 02/10/98
% Moisture.....: 93

PARAM	RESULT	DUPLICATE RESULT	UNITS	RPD	RPD LIMIT	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Reactive Cyanide						SD Lot-Sample #: I8B110118-001		
	ND	ND	mg/kg	0	(0-213)	SW846 7.3.3	02/13-02/17/98	8044160
		Dilution Factor: 1						
		Analysis Time..: 16:00						
Reactive Sulfide						SD Lot-Sample #: I8B110118-001		
	ND	ND	mg/kg	200	(0-20)	SW846 7.3.4	02/13/98/17/98	8044161
		Dilution Factor: 1						
		Analysis Time..: 00:00						

Chain of Custody Record

Quanterra

CHAIN OF CUSTODY NUMBER

* 0 0 0 7 0 8 - 0 0 1 *

I2E0118

QUA-4149 (1097)

Client	Project Manager	Date	Page 1 of 1
B.J.SERVICES	DAVID BURKETT	01/27/1998	
Address 2401 SIVLEY	**Telephone Number (Area Code)/Fax Number** (505) 746-9247 / (281) 363-7528	**Lab Location** QUANTERRA - AUSTIN	
City ARTESIA / **State** NM / **Zip Code** 88210	**Site Contact** MIKE WIGGINS		
Project Number/Name ARTESIA,NM	**Carrier/Waybill Number** AB 319186537.5		
Contract/Purchase Order/Quote Number CONTRACT / PURCHASE ORDER # : ARTESIA,NM		QUOTE: 22015	

Sample I.D. Number and Description	Date	Time	Sample Type	Containers: Volume	Containers: Type	Containers: No.	Preservative	Condition on Receipt/Comments	Analysis: TOTAL METALS 6010	TCLP METALS 6010	TCLP SEMIVOLS 8270	TCLP PESTICIDES 8081	TCLP HERBICIDES 8151	TCLP VOLATILES 8260	TCLP METALS 7470	TOTAL CORROSIVITY 1110
~~SHOP DRAIN SLUDGE~~	2-8-98	~~1PM~~	SOLID	1000ML	CLEAR GL	5	None	GOOD 5.8°C JM 2-10-98	X	X	X	X	X	X	X	X

Special Instructions: INCLUDE COC, LABELED BOTTLES, BLUE ICE,RETURN SHIPPING, CUSTODY SEALS
1 SAMPLE - WASH RACK SLUDGE

Possible Hazard Identification
☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

Sample Disposal
☐ Return To Client ☐ Disposal By Lab ☐ Archive For_____ Months
(A fee may be assessed if samples are retained longer than 3 months)

Turn Around Time Required
☐ Normal ☐ Rush ☐ Other_____

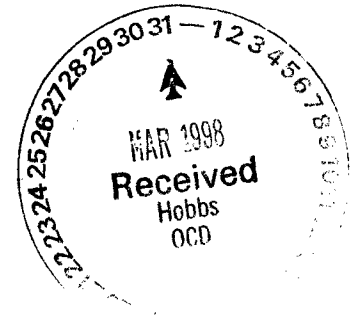
QC Level
☐ I. ☐ II. ☐ III.

Project Specific Requirements (Specify)

	Date	Time		Date	Time
1. Relinquished By	1/27/98	1800	1. Received By		
2. Relinquished By	2-8-98	3PM	2. Received By	2-10-98	0930
3. Relinquished By			3. Received By		

Comments

DISTRIBUTION: WHITE - Stays with the Sample; CANARY - Returned to Client with Report; PINK - Field Copy


MAR 1998
Received
Hobbs
OCD

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
MAR 4 1998
Environmental Bureau
Oil Conservation Division

Form C-1
Originated 8/1

Submit Orig
Plus 1 C
to appropr
District Of

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Verbal Approval Received: Yes ☐ No ☐	4. Generator Burlington Resources 5. Originating Site Val Verde Plant
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Waste Management
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) Section 14 Township 29N Range 11 West Bloomfield, New Mexico	

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

Hot oil filter from gas plant. See Attached.

Mixed with Exempt waste for shipment. See Attached.

Hand Delivered to Santa Fe by Ken Marsh 3-3-98 mjk

Sent to Hobbs 3-11-98

2 yards non exempt & 28 yards exempt

Estimated Volume _____ cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Environmental Compliance Manager DATE: 03/03/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: _____

APPROVED BY: Martyn J. Kirby TITLE: Env Geologist DATE: 3-4-98

BURLINGTON RESOURCES

SAN JUAN DIVISION

February 26, 1998

Controlled Recovery, Inc.
P.O. Box 369
Hobbs, NM 88241

Re: Disposal of Val Verde Process Filters

Dear Mr. Marsh:

The purpose of this correspondence is to submit the enclosed waste manifest in addition to the certificate of waste status for exempt and non-exempt waste streams.

Recently, the Val Verde facility is in the process of re-profiling filter cartridge waste streams that are generated from the production of natural gas. The main purpose for analyzing these waste streams was to comply with 40 CFR 262.11 waste determination requirements contained in the Resource Conservation and Recovery Act (RCRA). As a result the following process filters were obtained and analyzed for TCLP metals, Benzene, and the OCD requirement for Naturally Occurring Radioactive Material (NORM):

Waste	Exempt	Non-Exempt	Function at Val Verde Facility
Amine Mechanical Filter	x		Filters amine solvent as it enters the gas stream.
Horizontal Inlet Filter	x		First stage of gas entry, filters particulate from gas stream before entering the plant
Coalescer Inlet Filter	x		Second stage of filtering gas before entering the plant
Hot Oil Filter		x	Heat transfer system, side stream filter for heating amine to regenerate amine solvent
Bag Filter	x		Downstream filter, that filters charcoal particulate from the amine system.

With the exception of the hot oil filter, the units that were analyzed all qualify for the hazardous waste exemption contained in 40 CFR 261.4 (b)(5). Upon evaluating the analysis of the above-mentioned filters, it appears the Amine Mechanical Filters (50.5 mg/L) and Bag Filters (6.71 mg/L) exceed the TCLP threshold for chromium defined in 40 CFR 261.24. However, these two waste streams are specifically identified in EPA's RCRA exemption that was published in the Federal Register, July 6, 1988, in Volume 53, pages 25446 through 25454[1]. As documented on page 25454 of the Federal Register, "Gas plant sweeting wastes for sulfur removal, including amines, amine filters, amine filter media, backwash, precipitated amine sludge, iron sponge, and hydrogen sulfide scrubber liquid sludge". These particular filters are also identified in condition sixteen, "Spent filters, filter media, and back wash (assuming the filter itself is not hazardous and the residue in it is from an exempt waste stream)".

As stated in the table above, both filters are part of the "in line" amine system that is used to further purify the natural gas product at the Val Verde Plant. However, the hot oil filter is commingled with the roll-off, therefore, I am enclosing the analysis for this unit that verifies the filter is not a characteristic hazardous waste. Regarding the parameters that were selected for analyzing the hot oil filter, TCLP metals, benzene, and NORM were selected for characterizing the unit. These parameters were chosen through "generators knowledge" of the waste stream

[1] Federal Register, July 6, 1988, Pages 25453, 25454, and 25455

defined under 40 CFR 262.11 (c) (2). The filter unit is used to filter oil, which has a flash >140 degrees Fahrenheit and the material that is being filtered, does not exhibit reactive or corrosive characteristics. In addition, TCLP benzene was the remaining TCLP volatile that was analyzed for since this volatile is the only TCLP parameter with the likelihood of appearing in the waste stream. Furthermore, I have enclosed the "Certificate of Waste Status" form for both waste streams that will be contained in unit. It is my understanding that you will need to obtain OCD approval to receive the non-exempt waste stream.

Lastly, as you stated during our telephone conversation, the disposal costs for the filters would be $18.00 per cubic yard. However, in the future the only filters that will be transported and disposed of at your facility will be the Amine Mechanical Filters and the Bag Filters. Furthermore, as you are aware Waste Management will be providing the transportation of this material to your facility. Upon receiving the shipment, I am requesting the manifest be signed and sent back to my attention at the address documented on the upper right corner.

Again, I thank you for your time and consideration and I look forward to working with you in the future. Until that time, please contact me by telephone when OCD approves the disposal of the filters. I can be reached at my office number, which is 505-326-9537.

Sincerely,

Jeffery T. Schoenbacher
Environmental Specialist

CC: Keith Baker
Ed Hasely
Gaza Seabolt

JTS:

Manifest Number: _____

Waste Manifest

Date 3/2/98

Burlington Resources, San Juan Division

3535 East 30 th Street

P.O. Box 4289

Farmington, NM 87499-4289

Safety and Environmental Complete:

Waste Location: Val Verde Plant, Located in Bloomfield, NM
Section 14, Township 29 N, Range 11 W

Volume: 30 Cubic Yards | Barrels | Gallons | *Costs:* $18.00

Description: Filters that are utilized to purify Natural Gas.

Source:
Exempt Filters from Plant.
Amine Mechanical Inlet Filters
Horizontal Inlet Filters
Coalescer Inlet Filters
Bag Filters

Disposal Location: Controlled Recovery, Inc.
P.O. Box 369 Hobbs, NM 88241

Waste Determination

I hereby certify, represent and warrant that the wastes are generated from oil and gas exploration and production operations exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C Regulations.

I hereby certify, that according to the Resource Conservation and Recovery Act (RCRA) and Environmental Protection Agency's July, 1988, regulatory determination the above described waste is Non-Exempt oilfield waste which is non-hazardous by characteristic analysis or by product identification.

Approval for Disposal:

Signature: [signature] Date: 3/2/98 | Signature: [signature] Date: 3/2/98

Title: Environmental Rep. | Title: Environmental Rep

BR Representative Complete:

Transportation Company: Waste Management

BR Representative on Site: **Dates Transported:**

Signature: **Date:**

Complete and return to Burlington Safety and Environmental Department with Invoice:

Disposal Facility Complete:

Dates Received:

Volume Received:

Waste Location: Cell/Grid No.

Received By:

Comments: See Certificate #4 - Not oil Filters included with Shipment.

Certificate of Waste Status

Certificate Number: 3

Date: 3/2/98

Exempt Waste Material

As Required by New Mexico Oil Conservation Division

Originating Location: Val Verde Plant, Located in Bloomfield, NM
Section 14, Township 29 N, Range 11 W

Source:
Exempt Filters from Plant.
Amine Mechanical Inlet Filters
Horizontal Inlet Filters
Coalescer Inlet Filters
Bag Filters

Disposal Location: Controlled Recovery, Inc.
P.O. Box 369 Hobbs, NM 88241

As a condition for disposal:

I hereby certify that this waste is an exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determinations and that non-exempt waste that is a "hazardous waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has not been added or mixed with the exempt waste in such a manner so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613 (b).

I hereby certify, represent and warrant that the wastes are generated from oil and gas exploration and production operations exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C Regulations.

Co. Name: Burlington Resources

Name: Jeff Schoonbacher

Address: 3535 East 30 th Street

City: Farmington

State: NM

Zip: 87401

Title: Environmental Representative

Signature: J. Schoonbacher **Date:** 3/2/98

Comments:

Certificate Number: 4

Date 3/2/98

Certificate of Waste Status

Non-Exempt Waste Material

As Required by New Mexico Oil Conservation Division

Company/Generator:	Val Verde Plant, Located in Bloomfield, NM Section 14, Township 29N, Range 11W
Source:	Hot Oil Filter
Description:	Generated from Val Verde's heat transfer system for heating oil that is utilized to regenerate amine solution.
Generating Site:	Val Verde Plant, Located in Bloomfield, NM Section 14, Township 29N, Range 11W
Disposal Location:	Controlled Recovery Inc. P.O. Box 369, Hobbs NM 88241
Transportation Company:	Waste Management

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988, Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR 261 to verify the material is non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subpart C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

Company Name:	Burlington Resources
Representative:	Jeff Schoenbacher
Address:	3535 East 30 th Street
City:	Farmington
State:	NM
Zip:	87401
Title:	Environmental Representative
Signature:	Date: 3/2/98

Comments: Attached CC# 52331 Analysis.

Inter-Mountain Laboratories, Inc.

2508 W. Main Street
Farmington, New Mexico 87401

TOXICITY CHARACTERISTIC LEACHING PROCEDURE
TRACE METAL CONCENTRATION

Client:	**Burlington Resources**		
Project:	Val Verde Plant	Date Reported:	02/20/98
Sample ID:	Hot Oil Filter	Date Sampled:	02/13/98
Laboratory ID:	0398G00571	Date Received:	02/13/98
Sample Matrix:	Filter	Date Analyzed:	02/19/98

Parameter	Result	Detection Limit	Regulatory Level	Units
Arsenic	<0.005	0.005	5	mg/L
Barium	1.89	0.01	100	mg/L
Cadmium	<0.004	0.004	1	mg/L
Chromium	3.44	0.01	5	mg/L
Lead	<0.05	0.05	5	mg/L
Mercury	<0.001	0.001	0.2	mg/L
Selenium	<0.005	0.005	1	mg/L
Silver	<0.01	0.01	5	mg/L

ND- Analyte not detected at stated detection level.

References: Method 1311: Toxicity Characteristic Leaching Procedure, SW-846, Rev. 0, July 1992.

Method 3010A: Acid Digestion of Aqueous Samples and Extracts for Total Metals, SW-846, Rev. 1, July 1992.

Comments:

Reported By: _____ Reviewed: _____

Inter·Mountain Laboratories, Inc.
1701 Phillips Circle
Gillette, Wyoming 82718

TOXICITY CHARACTERISTIC LEACHING PROCEDURE
HSL VOLATILE COMPOUNDS

Client: **Burlington Resources**
Sample ID: Hot Oil Filter
Project ID: Valverde Plant
Lab ID: B980641 0398G00571
Matrix: Filter

Date Reported: 02/19/98
Date Sampled: 02/13/98
Date Received: 02/16/98
Date Extracted: 02/18/98
Date Analyzed: 02/19/98

Parameter	Result	PQL	Regulatory Level	Units
Benzene	ND	0.02	0.5	mg/L
QUALITY CONTROL - Surrogate Recovery	**%**		**QC Limits**	
1,2-Dichloroethane-d4	113		80 - 120	
Toluene-d8	107		88 - 110	
Bromofluorobenzene	107		86 - 115	

ND - Not Detected at Practical Quantitation Level (PQL)

Reference: Method 8260A Gas Chromatography/Mass Spectrometry for Volatile Organics, Test Methods for Evaluating Solid Wastes, SW-846, Final Update II, United States Environmental Protection Agency, September 1994.
Method 1311, Toxicity Characteristic Leaching Procedure, Test Methods for Evaluating Solid Wastes, SW-846, United States EPA, September 1994.

Analyst E.O. **Reviewed** [signature]

ARS
AMERICAN RADIATION SERVICES, INC.

1726 Wooddale Court • Baton Rouge, Louisiana 70806
1 (800) 401-4277 • Fax (504) 927-8822

ARS Tracking Number:	ARS-98-0178	**P.O. Number:**	216528
Client I.D.:	G00571	**ARS Sample I.D.:**	ARS-98-0658
Date Sampled:	N/A	**Date Received:**	2/16/98
Time Sampled:	N/A	**Time Received**	1145
Type of Sample:	Solid	**Date of Report**	2/19/98

Analysis Description	Analysis Result	Analysis Error ±2σ	Detection Limit	Analysis Units	Analysis Test Method	Analysis Date & Time	Analysis Technician
Ra-226	<0.93	N/A	0.93	pCi/gm	EPA 901.1M	2/17/98 1914	tf
Ra-228	<0.13	N/A	0.13	pCi/gm	EPA 901.1M	2/17/98 1914	tf
Pb-210	<0.54	N/A	0.54	pCi/gm	EPA 901.1M	2/17/98 1914	tf
Total Activity	3.87	N/A	N/A	pCi/gm	EPA 901.1M	2/17/98 1914	tf

Quality Assurance Review

Notes: American Radiation Services, Inc assumes no liability for the use or interpretation of any analytical results provided other than the cost of the performed analysis itself. Reproduction of this report in less than full requires the written consent of the client.

Inter-Mountain Laboratories, Inc.

2506 W. Main Street
Farmington, New Mexico 87401

Jeff Schoenbacher
Burlington Resources
3535 E. 30th St.
Farmington, NM 87402

20 February 1998

Mr. Schoenbacher:

Enclosed, please find the reports for the samples received by our laboratory for rush analysis on January 13, 1998.

If you have any questions about the results of the analyses, please don't hesitate to call me at your convenience.

We appreciate your business!

Sincerely,

Sharon Williams
Organics Lab Supervisor

Enclosure

xc: File

Inter·Mountain Laboratories, Inc.

2608 W. Main Street
Farmington, New Mexico 87401

Burlington Resources

Case Narrative

On February 13, 1998, five filters were submitted to Inter-Mountain Laboratories - Farmington for analysis. The samples were received intact. The samples were identified by project "Val Verde Plant", and were analyzed for the parameters indicated on the accompanying Chain of Custody document # 52331.

It is the policy of this laboratory to employ, whenever possible, preparatory and analytical methods which have been approved by regulatory agencies. The methods used in the analyses of the samples reported herein are found in Test Methods For Evaluation of Solid Waste, SW-846, USEPA, 1986, and Methods For Chemical Analysis of Water and Wastes, EPA-600/4-79-020, USEPA, 1983.

Quality control reports appear at the end of the analytical package and may be identified by title. If there are any questions regarding the information presented in this package, please feel free to call at your convenience.

Sincerely,

Sharon Williams
Organics Lab Supervisor

MERIDIAN-FARMINGTON ID:505-326-9725 MAR 02'98 15:21 No.005 P.08

imi
Inter-Mountain Laboratories, Inc.

CHAIN OF CUSTODY RECORD

Client/Project Name	Project Location	ANALYSES / PARAMETERS
Burlington / Val Verde. 10 gpm 262.11	Val Verde Plant	
Sampler: (Signature)	Chain of Custody Tape No.	Remarks

Sample No./ Identification	Date	Time	Lab Number	Matrix	No. of Containers	TSS	Fe	Mn		
Arion Mech Filter Cake	2/12/98	8:30		Filter	1	✓	✓	✓		Due 2-20-98
Horizontal Inlet Filter					1	✓	✓	✓		
Coalescer Inlet Filter					1	—	—	—		
Hot Oil Filter					1	✓	✓	✓		
Rag Filter	↓	★		↓	1	✓	—	—		
				CR						intact, hand delivered

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
	2/13/98	8:53			
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
Relinquished by: (Signature)	Date	Time	Received by laboratory: (Signature)	Date	Time
			Chris Rayner	2-13-98	0853

Inter-Mountain Laboratories, Inc.

☐ 1633 Terra Avenue, Sheridan, Wyoming 82801, Telephone (307) 672-8945
☐ 1701 Phillips Circle, Gillette, Wyoming 82718, Telephone (307) 682-8945
☐ 2506 West Main Street, Farmington, NM 87401, Telephone (505) 326-4737
☐ 1160 Research Drive, Bozeman, Montana 59718, Telephone (406) 586-8450
☐ 11183 State Hwy. 30, College Station, TX 77845, Telephone (409) 776-8945

52331

MERIDIAN-FARMINGTON ID:505-326-9725 MAR 02'98 15:22 No.005 P.09

imi
Inter-Mountain Laboratories, Inc.

CHAIN OF CUSTODY RECORD

Client/Project Name	Project Location	ANALYSES / PARAMETERS
Ru. Lighting / Val Verde. Roger Zeez.	Val Verde Plant	
Sampler: (Signature)	Chain of Custody Tape No.	Remarks

Sample No./ Identification	Date	Time	Lab Number	Matrix	No. of Containers	TCLP Metals	TCLP Benzene	Turnaround		
Avian Mech. Filt. Cake	2/12/98	8:50		Filter	1	✓	✓	✓		Rush 2-20-98
Horizontal Inlet Filter					1	✓	✓	✓		
Coalescer Inlet Filter					1	✓	✓	✓		
Hot Oil Filter					1	✓	✓	✓		
Bag Filter	*	*		*	1	✓	✓	✓		
										intact, iced

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
	2/13/98	8:53			
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
Relinquished by: (Signature)	Date	Time	Received by laboratory: (Signature)	Date	Time
			Chris Rayner	2-13-98	0853

Inter-Mountain Laboratories, Inc.

1633 Terra Avenue
Sheridan, Wyoming 82801
Telephone (307) 672-8945

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2506 West Main Street
Farmington, NM 87401
Telephone (505) 326-4737

1160 Research Drive
Bozeman, Montana 59718
Telephone (406) 586-8450

11183 State Hwy. 30
College Station, TX 77845
Telephone (409) 776-8945

52331

Inter-Mountain Laboratories, Inc.

2506 W. Main Street
Farmington, New Mexico 87401

Quality Control / Quality Assurance

Known Analysis

TOXICITY CHARACTERISTIC LEACHING PROCEDURE

Client:	Burlington Resources	Date Reported:	02/20/98
Project:	Val Verde Plant	Date Analyzed:	02/19/98
Sample Matrix:	Filter	Date Received:	02/13/98

Known Analysis

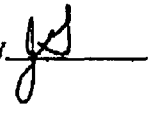
Parameter	Found Result	Known Result	Percent Recovery	Units
Arsenic	0.010	0.010	100%	mg/L
Barium	0.94	1.00	94%	mg/L
Cadmium	1.050	1.000	105%	mg/L
Chromium	1.05	1.00	105%	mg/L
Lead	1.01	1.00	101%	mg/L
Mercury	0.004	0.004	100%	mg/L
Selenium	0.009	0.010	90%	mg/L
Silver	1.07	1.00	107%	mg/L

References: Method 1311: Toxicity Characteristic Leaching Procedure, SW-846, Rev. 0, July 1992.

Method 3010A: Acid Digestion of Aqueous Samples and Extracts for Total Metals, SW-846, Rev. 1, July 1992.

Comments:

Reported by

Reviewed by 

Inter·Mountain Laboratories, Inc.

2506 W. Main Street
Farmington, New Mexico 87401

Quality Control / Quality Assurance

Spike Analysis / Blank Analysis

TOXICITY CHARACTERISTIC LEACHING PROCEDURE

Client:	Burlington Resources	Date Reported:	02/20/98
Project:	Val Verde Plant	Date Analyzed:	02/19/98
Sample Matrix:	Filter	Date Received:	02/13/98

Spike Analysis

Parameter	Spike Result (mg/L)	Sample Result (mg/L)	Spike Added (mg/L)	Percent Recovery
Arsenic	N/A	N/A	N/A	N/A
Barium	2.89	1.85	1.00	104%
Cadmium	1.100	<0.004	1.000	110%
Chromium	1.30	0.11	1.00	119%*
Lead	0.91	<0.05	1.00	91%
Mercury	0.005	<0.001	0.005	100%
Selenium	N/A	N/A	N/A	N/A
Silver	N/A	N/A	N/A	N/A

Method Blank Analysis

Parameter	Result	Detection Limit	Units
Arsenic	ND	0.005	mg/L
Barium	ND	0.01	mg/L
Cadmium	ND	0.004	mg/L
Chromium	ND	0.01	mg/L
Lead	ND	0.05	mg/L
Mercury	ND	0.001	mg/L
Selenium	ND	0.005	mg/L
Silver	ND	0.01	mg/L

References: Method 1311: Toxicity Characteristic Leaching Procedure, SW-846, Rev. 0, July 1992.

Method 3010A: Acid Digestion of Aqueous Samples and Extracts for Total Metals, SW-846, Rev. 1, July 1992.

Comments: *Spike recovery failed to meet established QC limits due to matrix interferences.
NA=Data not available.

Reported by _____ Reviewed by _____

Inter-Mountain Laboratories, Inc.

1701 Phillips Circle
Gillette, Wyoming 82718

LAB QA/QC
TOXICITY CHARACTERISTIC LEACHING PROCEDURE
METHOD BLANK

Date Analyzed: 02/19/98
Lab ID: MBW98049
Matrix: Water
Date Extracted 02/18/98

Parameter	Result	PQL	Units
Benzene	ND	0.02	mg/L

QUALITY CONTROL - Surrogate Recovery	%
1,2-Dichloroethane-d4	92
Bromofluorobenzene	101
Toluene-d8	105

ND - Not Detected at Practical Quantitation Level (PQL)

Analyst E.D.

Reviewed

Inter-Mountain Laboratories, Inc.

1701 Phillips Circle
Gillette, Wyoming 82718

LAB QA/QC
TOXICITY CHARACTERISTIC LEACHING PROCEDURE
MATRIX SPIKE SUMMARY

Date Analyzed: 02/19/98
Laboratory ID: G98-0642
Sample Matrix: Filter
Date Extracted: 2/18/98

Parameter	Spike Added mg/L	Sample Concentration mg/L	Matrix Spike Concentration mg/L	Matrix Spike Recovery (%)
Benzene	0.05	0	0.051	102

QUALITY CONTROL:

Surrogate Recovery	%
1,2-Dichloroethane-d4	116
Toluene-d8	104
Bromofluorobenzene	107

References:

Method 8260, Gas Chromatography/Mass Spectrometry for Volatile Organics, Test Methods for Evaluating Solid Wastes, SW-846, Final Update II,United States Environmental Protection Agency, September 1994.

Method 1311, Toxicity Characteristic Leaching Procedure, Test Methods for Evaluating Solid Wastes, SW-846, United States Environmental Protection Agency, September 1994.

E.D.
Analyst

Reviewed

Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

Energy Minerals and Natural Resources Department
Oil Conservation Divisi
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
MAR 1 1 1998
Environmental Bureau
Oil Conservation Division

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to appropr
District Of

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Dowell Schlumberge
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Hobbs Yard
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Dowell
3. Address of Facility Operator P.O. Box 369 Hobbs,	8. State NM
7. Location of Material (Street Address or ULSTR) 1105 W Bender	Hobbs, NM

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The Dowell HObbs facililty would like to submit the following analytical, MSDS sheets, and process knowledge to get approval to ship fiberglass material to the CRI Halfway facility.

~~DENIED - CWS not ORIGINAL, PLEASE SUPPLY + RESUBMIT~~ OK BY W PRICE - CWS [illegible] FOR BENDER - dr

Received by OCD: 3-11-98 9:44am Hobbs

FEB 1998
Received
Hobbs
OCD

Estimated Volume 3000 lbs cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Office Manager DATE: 02/20/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env Engr DATE: 3/6/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 3-11-98

[redacted]obbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

Energy Minerals and Natural Resources Department
Oil Conservation Divis
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to appropr
District Of

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Dowell Schlumberge
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Hobbs Yard
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Dowell
3. Address of Facility Operator P.O. Box 369 Hobbs,	8. State NM
7. Location of Material (Street Address or ULSTR) 1105 W Bender	Hobbs, NM

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BRIEF DESCRIPTION OF MATERIAL:

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FEB 1998
Received
Hobbs
OCD

Estimated Volume 3000 lbs cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Office Manager DATE: 12/02/97

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: _____

APPROVED BY: _____ TITLE: _____ DATE: _____

Schlumberger Dowell

Dowell
P.O. Box 640
Hobbs, NM 88241
(505) 393-6186

TO: WHOM IT MAY CONCERN

FROM: DARWIN THOMPSON

RE: WASTE DISPOSAL
DOWELL FACILITY
1105 W. BENDER
HOBBS, NM 88240

The waste we desire to dispose of at Controlled Recovery Incorporated has been generated by the cleaning of pumping equipment on oil field locations.
The constituents of this waste are fiberglass particles with diesel residue.

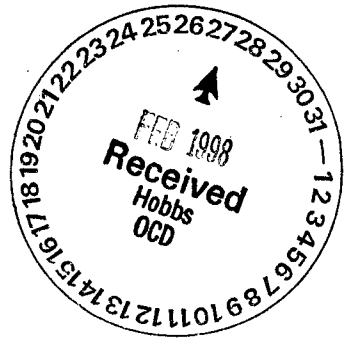
By process knowledge, there are no traces of metals or other constituents requiring a TCLP test. The results of the TPH and RCI tests of these wastes are attached.

There are no hazardous materials in this waste.

Sincerely,

Darwin Thompson

Darwin Thompson
Maintenance Supervisor
Dowell, Hobbs, NM



CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR Dowell Schlumberger

ADDRESS 1105 w. Bender

GENERATING SITE Hobbs NM yard

COUNTY Lea STATE NM

TYPE OF WASTE fiberglass material

ESTIMATED VOLUME 3000 lbs

GENERATING PROCESS cleaning of pumping equipment on oilfield locations

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY Dowell Schlumberger

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT Darwin Thompson
SIGNATURE

NAME Darwin Thompson
PRINTED

ADDRESS PO Box 640

Hobbs, NM

DATE 11/26/97

FEB 1998
Received
Hobbs
OCD

TOTAL P.02

"Not original"
OCD DATE!

DOWELL PRODUCT CODE: **J501** Effective Date: 1/3/96

Flammability (explosion limits in air):

Lower: Not applicable Upper: Not applicable

Autoflammability (auto-ignition temperature): Not applicable

Explosive properties (thermal decomposition temperature): Not determined

NFPA Rating: Health 0 Flammability 0 Reactivity 0 Other: None

Combustion products: see Section 10.

6. ACCIDENTAL RELEASE MEASURES

After spillage/leakage: Vacuum up. Avoid generating dust.

See Section 8 for protective equipment information.

See Section 13 for disposal information.

7. HANDLING AND STORAGE

Special Precautions: No special precautions required.

Packaging requirements: Paper bag (minimum 3 ply), or other industrial container designed for powders and granulated materials.

Ventilation: Provide ventilation to keep airborne concentrations below exposure limits.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Respiratory protection: Use NIOSH approved respirator with dust and mist protection (color coded gray or 3M 8710).

Eye protection: Chemical splash goggles.

Hand protection: Cotton gloves.

Skin protection: Clean, body-covering clothing. If exposure levels are high, an impervious suit is recommended.

Exposure Limit Guidelines (mg/m3)

Components having no established limits are not listed.

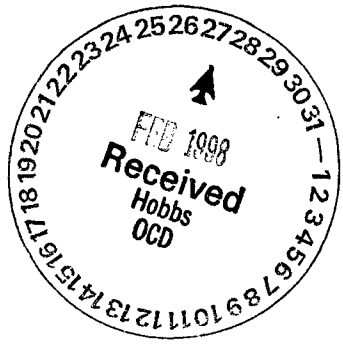
(NE: Not established, ND: Not determined)

These numbers may be referred to as OEL, MAC, MAK, MEL, OES, REL, PEL, or TLV.

TWA is the 8 hour time weighted average. STEL is the short term exposure limit.

"C" indicates the value is a maximum concentration (ceiling).

	INERT FIBER	
	TWA	STEL ANM
CANADA	ND	ND
USA: ACGIH	0.1	NE
USA: OSHA	0.1	NE



9. PHYSICAL AND CHEMICAL PROPERTIES

Form: Fibers

Color: White

Odor: None

pH value: Not applicable

Boiling point: Not determined

Pour point: Not determined

Vapor pressure: Not applicable

DOWELL PRODUCT CODE:	J501	Effective Date:	1/3/96

Relative density (specific gravity):	Not determined
Bulk Density (solids):	Not determined
%Solubility in water:	Insoluble
Viscosity:	Not applicable
Relative Vapor Density (air=1):	Not applicable
% Volatile:	10

10. STABILITY AND REACTIVITY

Stability:	Stable.
Conditions to avoid:	None known
Materials to avoid:	None known
Hazardous Polymerization:	Will not occur.
Dust explosion hazard (solids):	No.
Special hazards:	None.
Hazardous decomposition products:	None.

11. TOXICOLOGICAL INFORMATION

Eye contact:	May cause mechanical irritation.
Skin contact:	No effect expected. Prolonged or repeated contact may cause mild irritation.
Inhalation:	No effect expected. Prolonged or repeated exposure may cause mild irritation.
Ingestion:	No effect expected. Swallowing large amounts may cause illness.
Carcinogenicity:	Not listed by IARC, USA NTP, or USA OSHA.
Mutagenicity:	Not known to cause heritable genetic damage.
Teratogenicity:	Not known to cause birth defects.
Target organs which may be affected:	Lung
Sensitization:	Not known to cause allergic reaction.
Other:	None.

12. ECOLOGICAL INFORMATION

Information on product as a whole:	
Main environmental hazards:	None known.
Degradability:	Not determined
Fish Toxicity:	Not determined
Acute invertebrates toxicity:	Not determined
Growth Inhibition (algae):	Not determined
Other:	None known.

13. DISPOSAL CONSIDERATIONS

Product:	Dispose of by sanitary landfilling or other acceptable method in accordance with local regulations.
Container:	Send empty bags to sanitary landfill. Render other types of containers unuseable by puncturing or crushing and sanitary landfill unless prohibited by local regulations.
USA EPA RCRA:	NONE

14. TRANSPORT INFORMATION

ICC Tariff Classification COMPOUND, GAS OR OIL WELL DRILLING
ICC Item Number: 138640 ICC Class: 50 LTL 35 TL
Department of Transportation (DOT)
Description:
Hazard Class: Not Regulated
Shipping Name: Not Regulated
DOT Label: none
Comment:
CERCLA RQ: Not established.

Canadian Shipments
Shipping Name:
Special Provision:
Classification: Package Group:
ICAO Class:

15. REGULATORY INFORMATION

Notification/restrictions status:

USA:

All components of this material are on the USA TSCA inventory, or the components are exempt from inventory reporting.

CANADA:

All components of this material are on the Canada DSL, or the components are exempt from inventory reporting.

This product contains no chemicals subject to the USEPA reporting requirements of SARA 313.
The USEPA CERCLA Reportable Quantity (RQ) for this product as a whole is: Not established.

16. OTHER INFORMATION

Sections affected by last revision:
PHYSICAL AND CHEMICAL PROPERTIES

*Mark of Schlumberger. The information herein is believed to be accurate and is presented in good faith; however, no warranties or representations are made by Dowell regarding the accuracy or completeness of the information.

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
DOWELL SCHLUMBERGER
ATTN: DARWIN THOMPSON
P.O. BOX 604
HOBBS, NM 88241
FAX TO:

Receiving Date: 10/01/97
Reporting Date: 10/06/97
Project Number: NOT GIVEN
Project Name: NOT GIVEN
Project Location: NOT GIVEN

Analysis Date: 10/02/97
Sampling Date: 10/01/97
Sample Type: SOLID (GLASS WOOL)
Sample Condition: COOL & INTACT
Sample Received By: AH
Analyzed By: BC

LAB NUMBER	SAMPLE ID	TPH (mg/Kg)
H3229-1	PROPLOCK #1	542
H3229-2	PROPLOCK #2	2590
H3229-3	PROPLOCK #3	19500
H3229-4	PROPLOCK #4	1925
H3229-5	PROPLOCK #5	7800
H3229-6	PROPLOCK #6	6170
H3229-7	PROPLOCK #7	59500
H3229-8	PROPLOCK #8	14300
H3229-9	PROPLOCK #9	2590
Quality Control		205
True Value QC		200
% Accuracy		103
Relative Percent Difference		1.6

METHOD: EPA 418.1, 3510, 3540, or 3550; Infared Spectroscopy

Chemist

Date 10/6/97

FEB 1998
Received
Hobbs
OCD

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CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
DOWELL SCHLUMBERGER
ATTN: DARWIN THOMPSON
P.O. BOX 604
HOBBS, NM88241
FAX TO:

Receiving Date: 10/01/97
Reporting Date: 10/09/97
Project Number: NOT GIVEN
Project Name: NOT GIVEN
Project Location: NOT GIVEN

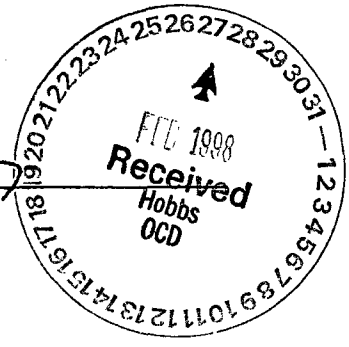
Sampling Date: 10/01/97
Sample Type: SOLID (GLASS WOOL)
Sample Condition: COOL & INTACT
Sample Received By: AH
Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	REACTIVITY Sulfide (ppm)	REACTIVITY Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY
ANALYSIS DATE:		10/6/97	10/6/97	10/8/97	10/3/97
H3229-1	PROPLOCK #1	<50	<50	7.85	Nonflammable
H3229-2	PROPLOCK #2	<50	<50	7.88	Nonflammable
H3229-3	PROPLOCK #3	<50	<50	7.59	Nonflammable
H3229-4	PROPLOCK #4	<50	<50	7.69	Nonflammable
H3229-5	PROPLOCK #5	<50	<50	7.65	Nonflammable
H3229-6	PROPLOCK #6	<50	<50	7.55	Nonflammable
H3229-7	PROPLOCK #7	<50	<50	6.23	Nonflammable
H3229-8	PROPLOCK #8	<50	<50	7.03	Nonflammable
H3229-9	PROPLOCK #9	<50	<50	7.56	Nonflammable
Quality Control		NR	NR	6.96	NR
True Value QC		NR	NR	7.00	NR
% Accuracy		NR	NR	99.4	NR
Relative Percent Difference		NR	NR	0.6	NR

METHOD: EPA SW 846-7.3, 7.2, 1030 (Proposed), *40 CFR 261*

Chemist

10/9/97
Date



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H3229R.XLS

CARDINAL LABORATORIES

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

ANALYTICAL RESULTS FOR
DOWELL SCHLUMBERGER
ATTN: DARWIN THOMPSON
P.O. BOX 640
HOBBS, NM 88240
FAX TO:

Receiving Date: 01/26/98
Reporting Date: 01/27/98
Project Number: NOT GIVEN
Project Name: PROPLOCK 1-9
Project Location: HOBBS, NM

Analysis Date: 01/27/98
Sampling Date: NOT GIVEN
Sample Type: SOLID (FIBERGLASS)
Sample Condition:COOL & INTACT
Sample Received By: BC
Analyzed By: BC

LAB NUMBER	SAMPLE ID	TOTAL BENZENE (mg/Kg)
H3426-1	FIBERGLASS	<0.010
Quality Control		0.104
True Value QC		0.100
% Accuracy		104
Relative Percent Difference		5.4

METHOD: EPA SW 846-8020, 5030, Gas Chromatography

Received
FEB 1998
Hobbs
OCD

Chemist

1/27/98
Date

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CARDINAL LABORATORIES, INC.

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

2111 Beechwood, Abilene, TX 79603 (915) 673-7001 Fax (915) 673-7020
101 East Marland, Hobbs, NM 88240 (505) 393-2326 Fax (505) 393-2476

Page ____ of ____

Company Name:	Dowell Schlumberger	BILL TO	PO #:
Project Manager:	DARWIN Thompson	Company:	CRT
Address:		Attn:	Ken
City:	Hobbs State: NM Zip: 88240	Address:	BX369
Phone #:		City:	Hobbs
Fax #:		State:	NM Zip: 88240
Project #:	Project Owner:	Phone #:	393 1079
Project Name:	PROPLOCK 1-9	Fax #:	393-3614
Project Location:	Hobbs N.M.		

ANALYSIS REQUEST

(Bex 2 one only) BTEX Protocol

FOR LAB USE ONLY				MATRIX						PRES.			SAMPLING	
LAB I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID:	ICE / COOL	OTHER :	DATE	TIME
H34126	Fiberglass tank	C	1						†					

Received Hobbs OCD FEB 1998

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Terms and Conditions: Interest will be charged on all accounts more than 30 days past due at the rate of 24% per annum from the original date of invoice, and all costs of collections, including attorney's fees.

Sampler Relinquished: Dan Parr	Date: 1-26-98 Time: 3:15 pm	Received By:	Phone Result ☐ Yes ☐ No Additional Fax #: Fax Result: ☐ Yes ☐ No REMARKS: note: chain of custody brought in on 1/27/98 bc
Relinquished By:	Date: 1/26/98 Time: 4:00PM	Received By: (Lab Staff) Burgett/Ken Cobb	
Delivered By: (Circle One) Sampler - UPS - Bus - Other:		Sample Condition: Cool ☒ Yes ☐ No Intact ☒ Yes ☐ No	CHECKED BY: (Initials)

† Cardinal cannot accept verbal changes. Please fax written changes to 915-673-7020.

P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-1
Originated 8/8/

Submit Origi
Plus 1 Co
to appropri
District Offi

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator **Dowell Schlumberge**
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site **Hobbs Yard**
2. Management Facility Destination **Controlled Recovery, Inc.**	6. Transporter **Dowell**
3. Address of Facility Operator **P.O. Box 369 Hobbs,**	8. State **NM**
7. Location of Material (Street Address or ULSTR) **1105 W Bender**	**Hobbs, NM**

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The Dowell HObbs facililty would like to submit the following analytical, MSDS sheets, and process knowledge to get approval to ship fiberglass material to the CRI Halfway facility.

DENIED! ~~NEED TCLP (full)~~ DIESEL FUEL? NO MSDS FOR FG!?
see MSDS, need Benzene! Wait for Benzene
Approved CRE 1/23/98

JAN 1998 Received Hobbs OCD

Estimated Volume 3000 lbs cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo Waste Management Facility Authorized Agent TITLE: Office Manager DATE: 12/02/97

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: _____

APPROVED BY: _____ TITLE: _____ DATE: _____

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR Dowell Schlumberger

ADDRESS 1105 w. Bender

GENERATING SITE Hobbs NM yard

COUNTY Lea **STATE** NM

TYPE OF WASTE fiberglass material

ESTIMATED VOLUME 3000 lbs

GENERATING PROCESS cleaning of pumping equipment on oilfield locations

REMARKS

NMOCD FACILITY **CONTROLLED RECOVERY INC.**

TRUCKING COMPANY Dowell Schlumberger

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

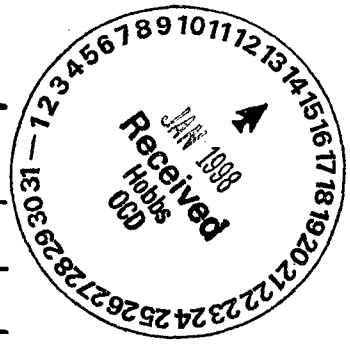
AGENT Darwin Thompson
SIGNATURE

NAME Darwin Thompson
PRINTED

ADDRESS PO Box 640

Hobbs, NM

DATE 11/26/97



Schlumberger Dowell

Dowell
P.O. Box 640
Hobbs, NM 88241
(505) 393-6186

TO: WHOM IT MAY CONCERN

FROM: DARWIN THOMPSON

RE: WASTE DISPOSAL
DOWELL FACILITY
1105 W. BENDER
HOBBS, NM 88240

The waste we desire to dispose of at Controlled Recovery Incorporated has been generated by the cleaning of pumping equipment on oil field locations.
The constituents of this waste are fiberglass particles with diesel residue.

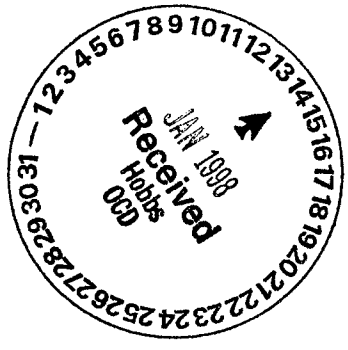
By process knowledge, there are no traces of metals or other constituents requiring a TCLP test. The results of the TPH and RCI tests of these wastes are attached.

There are no hazardous materials in this waste.

Sincerely,

Darwin Thompson

Darwin Thompson
Maintenance Supervisor
Dowell, Hobbs, NM



BROWN AND CALDWELL

December 10, 1997

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FAX TRANSMITTAL COVER SHEET

PLEASE DELIVER THE FOLLOWING PAGES TO:

Name: Ken Marsh **Company:** CRI

City: Hobbs, NM **FAX No:** 505-393-3615

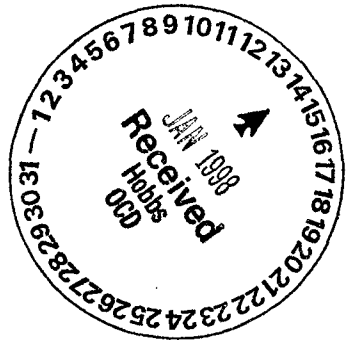
THIS TRANSMITTAL IS BEING SENT FROM:

Name: Tim Jenkins
User ID:
Job No: 2988-14

Return originals: Yes ☐ No ☐
Stamp: Yes ☐ No ☐
Staple: Yes ☐ No ☐

SPECIAL INSTRUCTIONS/REMARKS:

Attached is the analytical for the stockpiled diesel-impacted soil generated at the Artesia, NM facility. The composite sample is labled as STKPL-FIA. We will begin delivery of the soil to your landfarm beginning tomorrow (Thursday, 12/11/97). Thanks for your assistance with this project.



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Environmental Engineering And Consulting

SUITE 2500, 1415 LOUISIANA, HOUSTON, TEXAS 77002
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CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
DOWELL SCHLUMBERGER
ATTN: DARWIN THOMPSON
P.O. BOX 604
HOBBS, NM 88241
FAX TO:

Receiving Date: 10/01/97
Reporting Date: 10/06/97
Project Number: NOT GIVEN
Project Name: NOT GIVEN
Project Location: NOT GIVEN

Analysis Date: 10/02/97
Sampling Date: 10/01/97
Sample Type: SOLID (GLASS WOOL)
Sample Condition: COOL & INTACT
Sample Received By: AH
Analyzed By: BC

LAB NUMBER	SAMPLE ID	TPH (mg/Kg)
H3229-1	PROPLOCK #1	542
H3229-2	PROPLOCK #2	2590
H3229-3	PROPLOCK #3	19500
H3229-4	PROPLOCK #4	1925
H3229-5	PROPLOCK #5	7800
H3229-6	PROPLOCK #6	6170
H3229-7	PROPLOCK #7	59500
H3229-8	PROPLOCK #8	14300
H3229-9	PROPLOCK #9	2590
Quality Control		205
True Value QC		200
% Accuracy		103
Relative Percent Difference		1.6

METHOD: EPA 418.1, 3510, 3540, or 3550; Infared Spectroscopy

Chemist

Date 12/1/97

Received JAN 1998 Hobbs OCD

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ANALYTICAL RESULTS FOR
DOWELL SCHLUMBERGER
ATTN: DARWIN THOMPSON
P.O. BOX 604
HOBBS, NM88241
FAX TO:

Receiving Date: 10/01/97
Reporting Date: 10/09/97
Project Number: NOT GIVEN
Project Name: NOT GIVEN
Project Location: NOT GIVEN

Sampling Date: 10/01/97
Sample Type: SOLID (GLASS WOOL)
Sample Condition: COOL & INTACT
Sample Received By: AH
Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	REACTIVITY Sulfide (ppm)	Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY
ANALYSIS DATE:		10/6/97	10/6/97	10/8/97	10/3/97
H3229-1	PROPLOCK #1	<50	<50	7.85	Nonflammable
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H3229-5	PROPLOCK #5	<50	<50	7.65	Nonflammable
H3229-6	PROPLOCK #6	<50	<50	7.55	Nonflammable
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Quality Control		NR	NR	6.96	NR
True Value QC		NR	NR	7.00	NR
% Accuracy		NR	NR	99.4	NR
Relative Percent Difference		NR	NR	0.6	NR

METHOD: EPA SW 846-7.3, 7.2, 1030 (Proposed), *40 CFR 261*

Chemist

10/9/97
Date

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CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR Dowell Schlumberger

ADDRESS 1105 w. Bender

GENERATING SITE Hobbs NM yard

COUNTY Lea **STATE** NM

TYPE OF WASTE fiberglass material

ESTIMATED VOLUME 3000 lbs

GENERATING PROCESS cleaning of pumping equipment on oilfield locations

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY Dowell Schlumberger

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AGENT Darwin Thompson
SIGNATURE

NAME Darwin Thompson
PRINTED

ADDRESS PO Box 640

Hobbs, NM

DATE 11/26/97

JAN 1998 Received Hobbs OCD

Schlumberger Dowell

Dowell
P.O. Box 640
Hobbs, NM 88241
(505) 393-6186

TO: WHOM IT MAY CONCERN

FROM: DARWIN THOMPSON

RE: WASTE DISPOSAL
DOWELL FACILITY
1105 W. BENDER
HOBBS, NM 88240

The waste we desire to dispose of at Controlled Recovery Incorporated has been generated by the cleaning of pumping equipment on oil field locations.
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Sincerely,

Darwin Thompson

Darwin Thompson
Maintenance Supervisor
Dowell, Hobbs, NM

BROWN AND CALDWELL

December 10, 1997

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City: Hobbs, NM **FAX No:** 505-393-3615

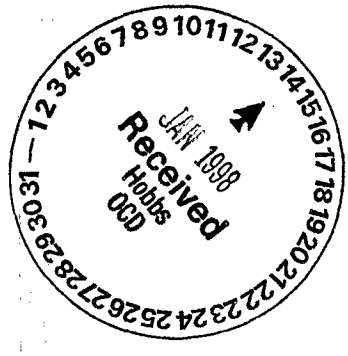
THIS TRANSMITTAL IS BEING SENT FROM:

Name: Tim Jenkins
User ID:
Job No: 2988-14

Return originals: Yes ☐ No ☐
Stamp: Yes ☐ No ☐
Staple: Yes ☐ No ☐

SPECIAL INSTRUCTIONS/REMARKS:

Attached is the analytical for the stockpiled diesel-impacted soil generated at the Artesia, NM facility. The composite sample is labled as STKPL-FIA. We will begin delivery of the soil to your landfarm beginning tomorrow (Thursday, 12/11/97). Thanks for your assistance with this project.



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

ANALYTICAL RESULTS FOR
DOWELL SCHLUMBERGER
ATTN: DARWIN THOMPSON
P.O. BOX 604
HOBBS, NM 88241
FAX TO:

Receiving Date: 10/01/97
Reporting Date: 10/06/97
Project Number: NOT GIVEN
Project Name: NOT GIVEN
Project Location: NOT GIVEN

Analysis Date: 10/02/97
Sampling Date: 10/01/97
Sample Type: SOLID (GLASS WOOL)
Sample Condition: COOL & INTACT
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True Value QC		200
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Relative Percent Difference		1.6

METHOD: EPA 418.1, 3510, 3540, or 3550; Infared Spectroscopy

Chemist

10/6/97
Date

Received
OCT 1997
Hobbs
OCD

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

ANALYTICAL RESULTS FOR
DOWELL SCHLUMBERGER
ATTN: DARWIN THOMPSON
P.O. BOX 604
HOBBS, NM88241
FAX TO:

Receiving Date: 10/01/97
Reporting Date: 10/09/97
Project Number: NOT GIVEN
Project Name: NOT GIVEN
Project Location: NOT GIVEN

Sampling Date: 10/01/97
Sample Type: SOLID (GLASS WOOL)
Sample Condition: COOL & INTACT
Sample Received By: AH
Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	REACTIVITY Sulfide (ppm)	Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY
ANALYSIS DATE:		10/6/97	10/6/97	10/8/97	10/3/97
H3229-1	PROPLOCK #1	<50	<50	7.85	Nonflammable
H3229-2	PROPLOCK #2	<50	<50	7.88	Nonflammable
H3229-3	PROPLOCK #3	<50	<50	7.59	Nonflammable
H3229-4	PROPLOCK #4	<50	<50	7.69	Nonflammable
H3229-5	PROPLOCK #5	<50	<50	7.65	Nonflammable
H3229-6	PROPLOCK #6	<50	<50	7.55	Nonflammable
H3229-7	PROPLOCK #7	<50	<50	6.23	Nonflammable
H3229-8	PROPLOCK #8	<50	<50	7.03	Nonflammable
H3229-9	PROPLOCK #9	<50	<50	7.56	Nonflammable
Quality Control		NR	NR	6.96	NR
True Value QC		NR	NR	7.00	NR
% Accuracy		NR	NR	99.4	NR
Relative Percent Difference		NR	NR	0.6	NR

METHOD: EPA SW 846-7.3, 7.2, 1030 (Proposed), *40 CFR 261*

JAN 1998 Received Hobbs OCD

Chemist

10/9/97
Date

H3229RSLT

PLEASE NOTE: Liability 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, 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.

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR B.J SERVICES

ADDRESS 2708 W. County Rd.

GENERATING SITE B.J. WASH RACK

COUNTY LEA STATE NM.

TYPE OF WASTE WASH RACK

ESTIMATED VOLUME 10 cubic ±

GENERATING PROCESS WASH RACK- WASHING TRUCKS

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY Sonny's Trucking

As a condition of acceptance for disposal, I hearby cartify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 261.3.

AGENT Dan V. Miller
SIGNATURE

NAME DAN V. MILLER
PRINTED

ADDRESS 2708 W County Road

Hobbs NM

DATE 12-02-97

JAN 1998 Received Hobbs OCD

Schlumberger

Dowell

MATERIAL SAFETY DATA SHEET

(Complies with USA OSHA 29 CFR 1910.1200 and ANSI Z 400.1)

DOWELL PRODUCT CODE: **J501** Effective Date: 1/3/96

1. IDENTIFICATION OF THE SUBSTANCE/PREPARATION AND OF THE COMPANY/UNDERTAKING

Identification of the substance or preparation:

PROPNET* II ADDITIVE J501

Company/undertaking identification: Dowell Safety/Environment - Worldwide
100 Gillingham Lane
Sugar Land, Texas 77478, USA
Error! Cannot open file.

Corporate Emergency Phone: USA 1-713-595-2345

Corporate Non-Emergency Phone: USA 1-713-275-8081

2. COMPOSITION/INFORMATION ON INGREDIENTS

PROPRIETARY MIXTURE CONTAINING:
INERT FIBER; 60 - 100%

3. HAZARDS IDENTIFICATION

Emergency Overview

Form: Fibers

Color: White

Odor: None

Main environmental hazards:

None known.

Main Physical Hazards

Special Precautions: None.

Physical Hazard: None.

Main Health Hazards:

HMIS RATING: Health 0 Flammability 0 Reactivity 0

None known.

See Section 11 for a complete discussion of health hazards.

4. FIRST AID MEASURES

Eye contact: Flush eyes with water for 5 minutes. Get medical attention if irritation occurs.

Skin contact: Rinse with water.

Inhalation: Remove to fresh air.

Swallowing: Rinse mouth with water. Seek medical attention if irritation occurs.

Notes: None.

5. FIRE FIGHTING MEASURES

Extinguishing media: None needed

Further Information: None known.

Flash point: Not combustible.

Method: Not applicable

DOWELL PRODUCT CODE: **J501** Effective Date: 1/3/96

Flammability (explosion limits in air):

Lower: Not applicable Upper: Not applicable

Autoflammability (auto-ignition temperature): Not applicable

Explosive properties (thermal decomposition temperature): Not determined

NFPA Rating: Health 0 Flammability 0 Reactivity 0 Other: None

Combustion products: see Section 10.

6. ACCIDENTAL RELEASE MEASURES

After spillage/leakage: Vacuum up. Avoid generating dust.

See Section 8 for protective equipment information.

See Section 13 for disposal information.

7. HANDLING AND STORAGE

Special Precautions: No special precautions required.

Packaging requirements: Paper bag (minimum 3 ply), or other industrial container designed for powders and granulated materials.

Ventilation: Provide ventilation to keep airborne concentrations below exposure limits.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Respiratory protection: Use NIOSH approved respirator with dust and mist protection (color coded gray or 3M 8710).

Eye protection: Chemical splash goggles.

Hand protection: Cotton gloves.

Skin protection: Clean, body-covering clothing. If exposure levels are high, an impervious suit is recommended.

Exposure Limit Guidelines (mg/m3)

Components having no established limits are not listed.

(NE: Not established, ND: Not determined)

These numbers may be referred to as OEL, MAC, MAK, MEL, OES, REL, PEL, or TLV.

TWA is the 8 hour time weighted average. STEL is the short term exposure limit.

"C" indicates the value is a maximum concentration (ceiling).

	INERT FIBER		
	TWA	STEL	ANM
CANADA	ND	ND	
USA: ACGIH	0.1	NE	
USA: OSHA	0.1	NE	

9. PHYSICAL AND CHEMICAL PROPERTIES

Form: Fibers

Color: White

Odor: None

pH value: Not applicable

Boiling point: Not determined

Pour point: Not determined

Vapor pressure: Not applicable

Relative density (specific gravity):	Not determined
Bulk Density (solids):	Not determined
%Solubility in water:	Insoluble
Viscosity:	Not applicable
Relative Vapor Density (air=1):	Not applicable
% Volatile:	10

10. STABILITY AND REACTIVITY

Stability:	Stable.
Conditions to avoid:	None known
Materials to avoid:	None known
Hazardous Polymerization:	Will not occur.
Dust explosion hazard (solids):	No.
Special hazards:	None.
Hazardous decomposition products:	None.

11. TOXICOLOGICAL INFORMATION

Eye contact:	May cause mechanical irritation.
Skin contact:	No effect expected. Prolonged or repeated contact may cause mild irritation.
Inhalation:	No effect expected. Prolonged or repeated exposure may cause mild irritation.
Ingestion:	No effect expected. Swallowing large amounts may cause illness.
Carcinogenicity:	Not listed by IARC, USA NTP, or USA OSHA.
Mutagenicity:	Not known to cause heritable genetic damage.
Teratogenicity:	Not known to cause birth defects.
Target organs which may be affected:	Lung
Sensitization:	Not known to cause allergic reaction.
Other:	None.

12. ECOLOGICAL INFORMATION

Information on product as a whole:	
Main environmental hazards:	None known.
Degradability:	Not determined
Fish Toxicity:	Not determined
Acute invertebrates toxicity:	Not determined
Growth Inhibition (algae):	Not determined
Other:	None known.

13. DISPOSAL CONSIDERATIONS

Product:	Dispose of by sanitary landfilling or other acceptable method in accordance with local regulations.
Container:	Send empty bags to sanitary landfill. Render other types of containers unuseable by puncturing or crushing and sanitary landfill unless prohibited by local regulations.
USA EPA RCRA:	NONE

DOWELL PRODUCT CODE: **J501** Effective Date: 1/3/96

14. TRANSPORT INFORMATION

ICC Tariff Classification COMPOUND, GAS OR OIL WELL DRILLING
ICC Item Number: 138640 ICC Class: 50 LTL 35 TL
Department of Transportation (DOT)
Description:
Hazard Class: Not Regulated
Shipping Name: Not Regulated
DOT Label: none
Comment:
CERCLA RQ: Not established.

Canadian Shipments
Shipping Name:
Special Provision:
Classification: Package Group:
ICAO Class:

15. REGULATORY INFORMATION

Notification/restrictions status:
USA:
All components of this material are on the USA TSCA inventory, or the components are exempt from inventory reporting.
CANADA:
All components of this material are on the Canada DSL, or the components are exempt from inventory reporting.

This product contains no chemicals subject to the USEPA reporting requirements of SARA 313.
The USEPA CERCLA Reportable Quantity (RQ) for this product as a whole is: Not established.

16. OTHER INFORMATION

Sections affected by last revision:
PHYSICAL AND CHEMICAL PROPERTIES

*Mark of Schlumberger. The information herein is believed to be accurate and is presented in good faith; however, no warranties or representations are made by Dowell regarding the accuracy or completeness of the information.

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-
Originated

Submit O
Plus 1
to appro
District

RECEIVED
APR 06 1998
Environmental Bureau
Oil Conservation Division

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Weatherford Enterra
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Snyder facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Fluid Transports
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 2200 Avenue R Snyder	Texas

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Weatherford Enterra Snyder facility. The waste was generated by steam cleaning oil field tools. This material has been approved in the past. I have included a certificate of waste, a chain of custody, and a Texas waste code.

APR 1998 Received Hobbs OCD

03-002

Estimated Volume 100 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

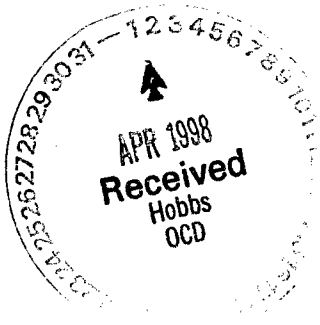
SIGNATURE: Billie Charo Waste Management Facility Authorized Agent TITLE: Environmental Compliance Manager DATE: 03/09/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Envr Engr DATE: 4/2/98

APPROVED BY: Martyne J Kelly TITLE: Env Geologist DATE: 4/6/98


APR 1998
Received
Hobbs
OCD

LLANO PERMIAN ENVIRONMENTAL

1031 Andrews Highway, Suite 207, Midland, Texas, 79701 O Telephone (915) 522-2133 O Telefax (915) 522-2180

March 04, 1998

Ms. Billy Charo
Controlled Recovery Inc.
P.O. Box 369
Hobbs, New Mexico 88241

RE: Waste Disposal Approval Request

Llano Permian Environmental Services requests approval to dispose of 100bbl (4200 gallons) of waste water and sludge generated by Weatherford Enterra Inc. (Weatherford). Weatherford has generated this waste from washing/steam cleaning oil field tools.

Weatherford generates this waste at:
2200 Avenue R
Snyder, TX 79549-1918
TX ID #80134
EPA ID #TXD000757641

The transporter of this waste will be Fluid Transports of Snyder, Texas. Fluid Transports is at:

P.O. Box 99
Snyder, TX 79550
(915) 573-5421
TX ID #41382
EPA ID #TXD982756744

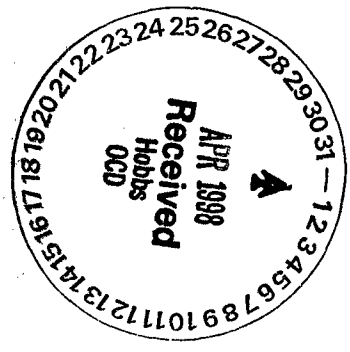
Please find attached copies of the certificate of waste, Texas Notice of Registration (NOR) analytical data, and chain of custody forms. Should you require additional information or have any questions please contact me at (915)522-2133.

Sincerely,
LLANO-PERMIAN ENVIRONMENTAL SERVICES

Robbie O. Walker
Environmental Technician

cc: Terry James, Llano-Permian Environmental
File: 101-007

Attachments



LPE

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR Weatherford Enterra, Inc.

ADRESS 2200 Avenue R Snyder TX 79549-1918

GENERATING SITE 2200 Avenue R Snyder TX 79549-1918

COUNTY Scurry STATE Texas

TYPE OF WASTE Sludge and waste water

ESTINATED VOLUME 100 bbl (4200 gallons)

GENERATING PROCESS Steam cleaning oil field tools.

REMARKS This waste is from the Snyder facility.

NMOCD FACILITY **CONTROLLED RECOVERY INC.**

TRUCKING COMPANY Fluid Transports (915)573-5421

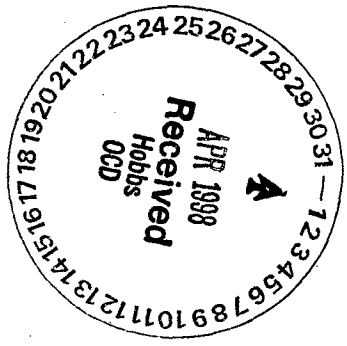
As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous, I further certify that to my Knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40CFR, Section 2613.

AGENT _____
SIGNATURE

NAME Robbie O. Walker
PRINTED

ADDRESS 1031 Andrews Hwy., Ste 207B
Midland, Texas 79701

DATE March 4,1998



0134 Weatherford U.S., Inc.

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete

***** Active Wastes ******

60163081 1 Active 08/05/94 Off No No
Description from Generator: Empty metal drums and empty metal containers from products purchased. Rendered empty after use of product. Non-hazardous.
Form Code: 308 Empty or crushed metal drums or containers
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

60174061 1 Active 08/05/94 Off No
Description from Generator: Empty fiber or plastic containers from products purchased. Rendered empty after use of product. Non-hazardous.
Form Code: 406 Empty fiber or plastic containers
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

60182961 1 Active 08/05/94 Off No
Description from Generator: Waste glycol based antifreeze/coolant. Removed from facility vehicles and equipment during service and repair. Non-hazardous.
Form Code: 296 Ethylene glycol based antifreeze
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

60196951 1 Active 09/18/95 Off No
Description from Generator: Petroleum contaminated sludge from sump. Tools are steam cleaned & washed to remove lubricant, dirt, paint, scale & corrosion. Liquids are removed &I sludge remains.
Form Code: 695 Petro contam sldg not still bottoms & oily sludges
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Sump sludge

60203071 1 Active 08/05/94 Off No
Description from Generator: Scrap metal. Generated during the manufacture and servicing of oil field tools and equipment. Miscellaneous metal pieces and parts which are no longer useable are scrapped and sent to metal recycler. Non-hazardous.
Form Code: 307 Metal scale, filings, or scrap
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Scrap metal

60219022 2 Active 08/05/94 Off No
Description from Generator: Supplemental plant refuse primarily solid floor sweepings from plant production operations. Non-hazardous.
Form Code: 902 Supplemental plant production refuse
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

Received FEB 1996

84256

Page ____ of ____

TraceAnalysis, Inc.

6701 Aberdeen Avenue, Ste. 9 Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

LAB Order ID # 499

Company Name: LP Environmental
Phone #: (915) 522-2133
Address: 1031 Andrews Hwy Ste 207
Fax #: (915) 522-2180
Contact Person: Robbie Walker
Invoice to: (If different from above) Weatherford Enterra Inc 2200 Ave R Snyder TX 79549-1948 Attn: Kelly
Project #: 101-007
Project Name: Maint
Project Location: Snyder
Sampler Signature: Robbie Walker

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME
84256	SS-1	1	32oz				X				X	10/29	7:45am

ANALYSIS REQUEST (Circle or Specify Method No.)

MTBE 8020/602	BTEX 8020/602	TPH	PAH 8270	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	GC/MS Vol. 8240/8260/624	GC/MS Semi. Vol. 8270/625	PCB's 8080/608	Pest. 8080/608	BOD, TSS, PH	Turn Around Time if different from standard	Hold
		X			X	X	X	X							

Received by Hobbs OCD APR 1998

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
[signature]	10/29/97	2:30 PM	Helen Shelton	10/29/97	2:30 PM
Helen Shelton	10/29/97	6:15PM			
			Received at Laboratory by:	Date:	Time:
			Vicki Lindhaus	10/30/97	9:20AM

LAB USE ONLY
Intact (Y) N
Headspace Y / N
Temp 3 °
Log-In Review B

REMARKS: Sent to TEL 10/31

303AD

Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C.O.C.

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
LLANO PERMIAN ENVIRONMENTAL
Attention: Robbie Walker
1031 Andrews Hwy., Suite 207
Midland, TX 79701

November 11, 1997
Receiving Date: 10/30/97
Sample Type: Sludge
Project No: 101-007
Project Location: Snyder, TX

Extraction Date: 11/05/97
Analysis Date: 11/05/97
Sampling Date: 10/29/97
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: Maint.

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	IGNITABILITY
	EPA LIMIT =	--	500	250	--	<2 >12.5	--
T84256	SS-1	Non-reactive	20	5.0	Non-corrosive	10.5	Nonignitable
QC	Quality Control	--	--	--	--	7.0	--
RPD		0	0	0	0	0	0
% Extraction Accuracy		--	--	--	--	--	--
% Instrument Accuracy		--	--	--	--	100	--

Received
Hobbs
OCD
APR 1998

METHODS: EPA SW 846-2.1.3, 2.1.2, 2.1.1.
CHEMIST: JG

Director, Dr. Blair Leftwich

11-11-97
DATE

NOV-11-97 12:52P
P.01

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
Llano Permian Environmental
Attention Robbie Walker
1031 Andrews Hwy, Ste. 207
Midland Tx.79701

Date: Oct 31, 1997
Date Rec: 10/30/97
Project: 101-007
Proj Name: Maint.
Proj Loc: Snyder, Tx.

Lab Receiving # : 9710000499
Sampling Date: 10/29/97
Sample Condition: Intact and Cool
Sample Received By: VW

TA#	Field Code	MATRIX	TRPHC (mg/Kg)
T 84256	SS-1	Sludge	134,000
Method Blank			<0.500
Reporting Limit			10
QC			104

RPD	2
% Extraction Accuracy	3,306
% Instrument Accuracy	104

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/Kg)
TRPHC	EPA 3550	10/30/97	EPA 418.1	10/31/97	MS	100	8.5

Director, Dr. Blair Leftwich

10-31-97
Date

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

November 11, 1997
Receiving Date: 10/30/97
Sample Type: Sludge
Project No: 101-007
Project Location: Snyder, TX

ANALYTICAL RESULTS FOR
LLANO PERMIAN ENVIRONMENTAL
Attention: Robbie Walker
1031 Andrews Hwy., Suite 207
Midland, TX 79701

Extraction Date: 11/04/97
Analysis Date: 11/05/97
Sampling Date: 10/29/97
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: Maint.

TA#	Field Code	TCLP METALS (mg/L)							
		As	Se	Cd	Cr	Pb	Ag	Ba	Hg
	EPA LIMIT =	5.0	1.0	1.0	5.0	5.0	5.0	100.0	0.20
T84256	SS-1	<0.10	<0.10	<0.02	<0.05	<0.10	<0.01	<0.20	<0.01
QC	Quality Control	4.7	4.8	5.0	4.9	4.8	0.95	4.8	0.05
	Reporting Limit	0.10	0.10	0.02	0.05	0.10	0.01	0.20	0.01
	RPD	2	1	0	0	0	13	1	5
	% Extraction Accuracy	85	100	85	85	85	110	90	88
	% Instrument Accuracy	93	96	100	97	95	95	96	100

CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba: RR Hg: JT
METHODS: EPA SW 846-1311, 6010B, 7470.
TCLP METALS SPIKE: 2.0 mg/L As, Se, Cd, Cr, Pb, Ba; 0.5 mg/L Ag; 0.05 mg/L Hg.
TCLP METALS QC: 5.0 mg/L As, Se, Cd, Cr, Pb, Ba; 1.0 mg/L Ag; 0.05 mg/L Hg.

Director, Dr. Blair Leftwich

Received
APR 1998
Hobbs
OCD

11-11-97
Date

p.03

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
LLANO PERMIAN ENVIRONMENTAL
Attention: Robbie Walker
1031 Andrews Hwy., Suite 207
Midland, TX 79701

November 11, 1997
Receiving Date: 10/30/97
Sample Type: Sludge
Project No: 101-007
Project Location: Snyder, TX

Extraction Date: 11/03/97
Analysis Date: 11/05/97
Sampling Date: 10/29/97
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: Maint.

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T84256 SS-1	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	73	*200	1	91
1,4-Dichlorobenzene	7.5	0.05	ND	72	6	32	90
o-Cresol	200.0	0.05	0.05	85	12	75	106
m,p-Cresol	200.0	0.05	0.35	89	9	59	111
Total Cresol	200.0	0.05	ND	---	---	---	---
Hexachloroethane	3.0	0.05	ND	93	10	24	115
Nitrobenzene	2.0	0.05	ND	89	13	42	111
Hexachlorobutadiene	0.5	0.05	ND	75	20	23	94
2,4,6-Trichlorophenol	2.0	0.05	ND	82	16	43	103
2,4,5-Trichlorophenol	400.0	0.05	ND	75	14	42	94
2,4-Dinitrotoluene	0.13	0.05	ND	94	4	41	118
2,4-D	10.0	0.05	ND	64	6	76	80
Hexachlorobenzene	0.13	0.05	ND	86	17	44	108
2,4,5-TP	1.0	0.05	ND	89	5	116	111
Pentachlorophenol	100.0	0.05	ND	91	5	36	114

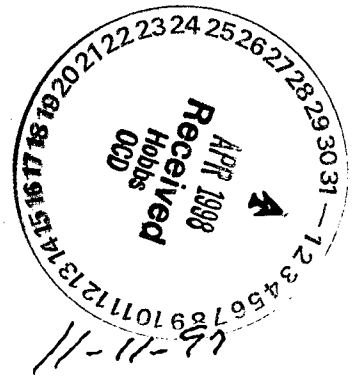
*NOTE: RPD out of limits.
**NOTE: Surrogate recovery out of standard range.

ND - Not Detected

Surrogates	% RECOVERY
2-Fluorophenol	**13
Phenol-d6	41
Nitrobenzene-d5	54
2-Fluorobiphenyl	59
2,4,6-Tribromophenol	66
Terphenyl-d14	104

Methods: EPA SW 846-1311, 8270
CHEMIST: RP/HW

Director, Dr. Blair Leftwich



11-11-97
DATE

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
LLANO PERMIAN ENVIRONMENTAL
Attention: Robbie Walker
1031 Andrews Hwy., Ste. 207
Midland, TX 79701

November 11, 1997
Receiving Date: 10/30/97
Sample Type: Sludge
Project No: 101-007
Project Location: Snyder, TX

Extraction Date: 11/03/97
Analysis Date: 11/04/97
Sampling Date: 10/29/97
Sample Condition: I & C
Sample Received by: VW
Project Name: Maint.

TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T84256 SS-1	QC	RPD	%EA	%IA
Vinyl chloride	0.20	0.05	ND	0.115	14	83	115
1,1-Dichloroethene	0.70	0.05	ND	0.104	13	94	104
Methyl Ethyl Ketone	200.0	0.5	ND	0.104	15	82	104
Chloroform	6.00	0.05	ND	0.097	13	100	97
1,2-Dichloroethane	0.50	0.05	ND	0.100	16	101	100
Benzene	0.50	0.05	ND	0.103	10	100	103
Carbon Tetrachloride	0.50	0.05	ND	0.110	9	115	110
Trichloroethene	0.50	0.05	ND	0.102	9	101	102
Tetrachloroethene	0.70	0.05	ND	0.101	11	101	101
Chlorobenzene	100.00	0.05	ND	0.100	13	99	100
1,4-Dichlorobenzene	7.50	0.05	ND	0.101	14	98	101

SURROGATES	% Recovery
Dibromofluoromethane	92
Toluene-d8	95
4-Bromofluorobenzene	92

ND = NOT DETECTED

METHODS: EPA SW 846-1311, 8260.
CHEMIST: RW

Director, Dr. Blair Leftwich

Received
Hobbs OCD
Apr 1998
11-97
DATE

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
MAR 27 1998
Environmental Bureau
Oil Conservation Division

Form C-1
Originated 8/1

Submit Orig
Plus 1 C
to appropr
District Of

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Weatherford Enterra
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Odessa Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Malco Trucking
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 1848 Mercury Ave.	Odessa Texas

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Weatherford Enterra Odessa facility. The waste water and sludge was generated by washing/steam cleaning oil field tools. This material has been approved in the past. I have included a certificate of waste, a chain of custody, and a Texas waste code.

MAR 1998 Received Hobbs OCD

03-010

Estimated Volume 250 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Environmental Compliance Manager DATE: 03/23/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Field Supt DATE: 3/24/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 3/27/98

Faxed to Hobbs 3/27/98
Mailed to Hobbs 3/27/98

MAR 1998
Received
Hobbs
OCD

Weatherford Enterra U.S., Limited Partnership
1848 Mercury Avenue
Odessa, Texas 79763

915/530-4900
Telefax: 915/530-4908

Weatherford Enterra

March 18, 1998

Ms. Billy Charo
Controlled Recovery Inc
PO Box 369
Hobbs, NM 88241

RE: Waste Disposal Approval Request

Weatherford requests approval to dispose of 250 bbl (10,500 gallons) of waste water and sludge generated by Weatherford. Weatherford has generated this waste from washing/steam cleaning oil field tools.

Weatherford generates this waste at:
1848 Mercury Ave.
Odessa, TX 79763
TX ID #39113
EPA ID # TXD987982691

The transporter of this waste will be Malco Trucking Company of Odessa, Texas. Malco Trucking Company is located at:
2800 W 42Nd Street
Odessa, Texas 79764
(915) 366-4080
TX ID # 76665
EPA ID #TXD988042339

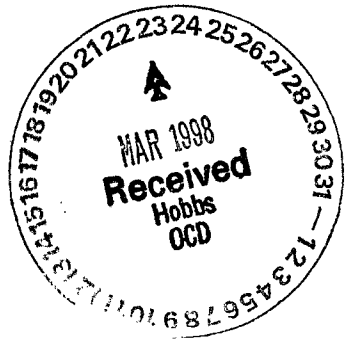
Please find attached the certificate of waste letter. Should you require additional information or have any questions please contact me at (915) 530-4900.

Sincerely,

Gina King

Gina King

Enclosure



CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR Weatherford

ADDRESS 1848 Mercury Avenue Odessa TX 79763

COUNTY Ector STATE Texas

YPE OF WASTE Sludge and waste water

ESTIMATED VOLUME 250 BBL. (10,500 gallons)

GENERATING PROCESS Steam cleaning oil filed tools.

REMARKS This waste if from the Mercury Avenue facility.

NMOCD FACILITY **CONTROLLED RECOVERY INC.**

TRUCKING COMPANY Malco Trucking Company (915) 366-4080

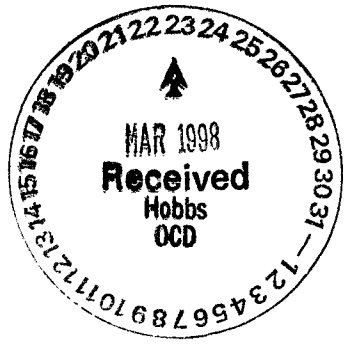
As a condition of acceptance for disposal, I hereby certify that this waste is a non- exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous, I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT Gina King
SIGNATURE

NAME Gina King
PRINTED

ADDRESS 1848 Mercury Ave.
Odessa, Texas 79763

DATE March 18, 1998



LP Llano-Permian Environmental Services
Amarillo, Texas Midland, Texas

December 8, 1997

Ms. Billy Charro
Controlled Recovery Inc.
Hobbs, New Mexico 88214

RE: Corrected Analitical for Odessa Mercury Ave.

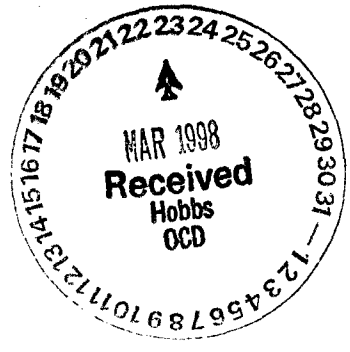
This copy of analiticals for Weatherford Odessa Mercury Ave. facility is an updated copy and the correct data for the sample of sump sludge that was previously analized. The sample was reanalyzed for sulfide and cyanide by alternate approved methods that are not as susceptible to interferences. The re-analysis shows low, acceptable levels of cyanide and sulfide.

Sincerely,
LLANO-PERMIAN ENVIRONMENTAL SERVICES

Robbie O. Walker
Environmental Technician

cc: Terry James Llano-Permian Environmental
File: 101-005

Attachments



1031 Andrews Hwy. ● Midland, Texas 79701 ● 915-522-2133 ● 915-522-2180 Fax

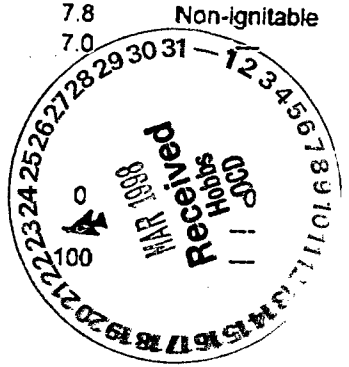
TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
LLANO PERMIAN ENVIRONMENTAL
Attention: Robbie Walker
1031 Andrews Hwy., Ste. 207
Midland, TX 79701

December 05, 1997
Receiving Date: 11/04/97
Sample Type: Sludge
Project No: 101-005
Project Location: Mercury Ave.
Odessa, TX

Extraction Date: 11/04, 26/97
Analysis Date: 11/06, 26/97
Sampling Date: 10/30/97
Sample Condition: I & C
Sample Received by: VW
Project Name: Maintenance

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	IGNITABILITY
	EPA LIMIT =	—	500	250	—	<2 >12.5	—
T84691	MAS-1	Non-reactive	16	0.35	Non-corrosive	7.8	Non-ignitable
QC	Quality Control	—	400	0.042	--	7.0	
RPD		0	0	9	0	0	--
% Extraction Accuracy		—	—	108	--	--	--
% Instrument Accuracy		--	—	106	—	100	—



METHODS: EPA SW 846-2.1.3, 2.1.2, 2.1.1; EPA 335.2, 376.1.
CHEMIST: REACTIVITY/CORROSIVITY/pH/IGNITABILITY: JS SULFIDES/CYANIDE: RC
CYANIDE SPIKE: 1.0 mg/kg CYANIDE.
CYANIDE SPIKE: 0.04 mg/L CYANIDE.

Director, Dr. Blair Leftwich

12-5-97
DATE

Dec-08-97 02:48P
P.02

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

December 08, 1997

Llano Permian Environmental
Attention: Robbie Walker
1031 Andrews Hwy., suite 207
Midland, TX 79701

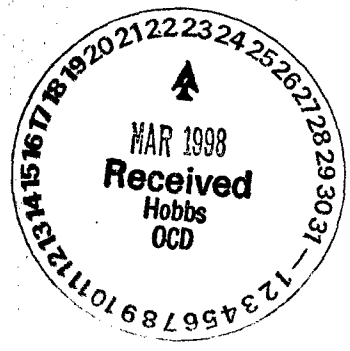
RE: RCI - Sample T84691

Dear Mr. Walker:

Reactive sulfides and cyanides were previously analyzed by a screening method and reported 11/07/97. The screening method often shows higher than actual sulfide and cyanide results due to interference whenever sulfides and cyanides are present. The sample was originally shown as reactive because of the high levels of sulfides and cyanides. The sample was reanalyzed for sulfide and cyanide by alternate approved methods that are not as susceptible to interferences. The re-analysis (12-05-97) shows low, acceptable levels of cyanide and sulfide.

Sincerely,

Blair Leftwich, M.P.H., Dr.Sc.
Director



39113 Enterra Oil Field Rental

**** WASTE INFORMATION ****

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete
****** Active Wastes ******						
02015191 1		Active	10/28/91	Off		No

Description from Generator: Cleaning of oilfield rental tools drill pipe. Returned hardware is steam cleaned, rinsate is collected in sump where solids are settled out. Rinse water is recycled for use. This waste is from current units 001,002,003,Not dated 11/13/91
Form Code: 519 Other inorganic sludges
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

02021141 1 Active 10/28/91 Off No

Description from Generator: Cleaning of oilfield rental tools/ drill pipe. Returned hardware is steam cleaned, rinsate is collected in sump where solids are settled out. Rinse water is recycled for use. This waste is from current units 001,002,003, Not Dated 11/13/91
Form Code: 114 Other aqueous waste with low dissolved solids
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

0501203K E Active 01/20/95 Off No No

Description from Generator: Spent Solvents Generated from parts cleaning.
Form Code: 203 Non-halogenated solvent
EPA Hazardous Waste Numbers: D001 D005 D006 D018 D035 D039 D040
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: A19 Other cleaning and degreasing
* Measurement Points: 1 Before mixing
* SIC Codes: 1389 Oil & Gas Field Services, Not Elsewhere Found

---

909760 H Active On/Off No

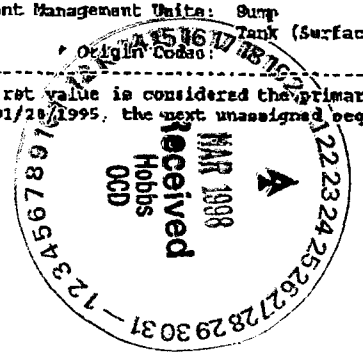
Description from Generator: WASTEWATER, OILY
Form Code:
EPA Hazardous Waste Numbers: D006
Current Management Units: Sump 002
Tank 003
Tank (Surface) 001
* Origin Codes:

940080 H Active On/Off No

Description from Generator: SLUDGE, HEAVY METAL CONTAINING
Form Code:
EPA Hazardous Waste Numbers: D006
Current Management Units: Sump 002
Tank (Surface) 001
* Origin Codes:

---

* The first value is considered the primary value (e.g. primary origin code).
As of 01/20/1995, the next unassigned sequence number for WASTES is 0502.



NOV-25-1996 18:04 NICKELL ENVIRONMENTAL P.12/13
11/25/96 17:56 TX/RX NO.6014 P.012

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
LLANO PERMIAN ENVIRONMENTAL
Attention: Robbie Walker
1031 Andrews Hwy., Ste. 207
Midland, TX 79701

November 7, 1997
Receiving Date: 11/04/97
Sample Type: Sludge
Project No: 101005
Project Location: Mercury Ave.
Odessa, Tx

Extraction Date: 11/05/97
Analysis Date: 11/06/97
Sampling Date: 10/30/97
Sample Condition: I & C
Sample Received by: VW
Project Name: Maintenance

TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T84691 MAS-1	QC	RPD	%EA	%IA
Vinyl chloride	0.20	0.05	ND	102	2	83	102
1,1-Dichloroethene	0.70	0.05	ND	99	1	95	99
Methyl Ethyl Ketone	200.0	0.5	ND	99	8	85	99
Chloroform	6.00	0.05	ND	97	1	101	97
1,2-Dichloroethane	0.50	0.05	ND	100	1	102	100
Benzene	0.50	0.05	ND	100	1	101	100
Carbon Tetrachloride	0.50	0.05	ND	112	1	101	112
Trichloroethene	0.50	0.05	ND	99	0	104	99
Tetrachloroethene	0.70	0.05	ND	98	1	104	98
Chlorobenzene	100.00	0.05	ND	102	2	102	102
1,4-Dichlorobenzene	7.50	0.05	ND	100	2	101	100

SURROGATES	**% Recovery**
Dibromofluoromethane	94
Toluene-d8	94
4-Bromofluorobenzene	94

ND = Not Detected

METHODS: EPA SW 846-1311, 8260.
CHEMIST: RW

Director, Dr. Blair Leftwich

11-7-97
DATE

MAR 1998
Received
Hobbs
OCD

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
LLANO PERMIAN ENVIRONMENTAL
Attention: Robbie Walker
1031 Andrews Hwy., Ste. 207
Midland, TX 79701

November 7, 1997
Receiving Date: 11/04/97
Sample Type: Sludge
Project No: 101-005
Project Location: Mercury Ave.
Odessa, TX

Extraction Date: 11/06/97
Analysis Date: 11/06/97
Sampling Date: 10/30/97
Sample Condition: I & C
Sample Received by: VW
Project Name: Maintenance

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T84691 MAS-1	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	73	200*	1	91
1,4-Dichlorobenzene	7.5	0.05	ND	72	6	32	90
o-Cresol	200.0	0.05	ND	85	12	75	106
m,p-Cresol	200.0	0.05	ND	89	9	59	111
Total Cresol	200.0	0.05	ND	---	---	---	---
Hexachloroethane	3.0	0.05	ND	93	10	24	116
Nitrobenzene	2.0	0.05	ND	89	13	42	111
Hexachlorobutadiene	0.5	0.05	ND	75	20	23	94
2,4,6-Trichlorophenol	2.0	0.05	ND	82	16	43	103
2,4,5-Trichlorophenol	400.0	0.05	ND	75	14	42	94
2,4-Dinitrotoluene	0.13	0.05	ND	94	4	41	118
2,4-D	10.0	0.05	ND	64	6	76	80
Hexachlorobenzene	0.13	0.05	ND	86	17	44	108
2,4,5-TP	1.0	0.05	ND	89	5	116	111
Pentachlorophenol	100.0	0.05	ND	91	5	36	114

Surrogates	% RECOVERY
2-Fluorophenol	6**
Phenol-d6	16
Nitrobenzene-d5	57
2-Fluorobiphenyl	51
2,4,6-Tribromophenol	27
Terphenyl-d14	84

***NOTE: RPD out of standard range.**
****NOTE: Surrogate Recovery out of standard range due to sample matrix effect.**

Methods: EPA SW 846-1311, 8270.
CHEMIST: RP/HW
ND - Not Detected

MAR 1998
Received
Hobbs
OCD

Director, Dr. Blair Leftwich

11-7-97
DATE

bc

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
LLANO PERMIAN ENVIRONMENTAL
Attention: Robbie Walker
1031 Andrews Hwy., Ste. 207
Midland, TX 79701

November 7, 1997
Receiving Date: 11/04/97
Sample Type: Sludge
Project No: 101-005
Project Location: Mercury Ave.
Odessa, TX

Extraction Date: 11/04/97
Analysis Date: 11/06/97
Sampling Date: 10/30/97
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: Maintenance

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cd	Cr	Pb	Ag	Ba	Hg
	EPA LIMIT =	5.0	1.0	1.0	5.0	5.0	5.0	100.0	0.20
T84691	MAS-1	<0.10	<0.10	<0.02	<0.05	<0.10	<0.01	0.6	<0.01
QC	Quality Control	4.7	4.8	5.0	4.9	4.8	0.95	5.0	0.05
Reporting Limit		0.10	0.10	0.02	0.05	0.10	0.01	0.20	0.01
RPD		2	1	0	0	0	13	1	0
% Extraction Accuracy		85	100	85	85	85	110	90	88
% Instrument Accuracy		93	96	100	97	95	95	96	100

CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba: RR Hg: HC
METHODS: EPA SW 846-1311, 6010, 7470.
TCLP METALS SPIKE: 2.0 mg/L As, Se, Cd, Cr, Pb, Ba; 0.5 mg/L Ag; 0.05 mg/L Hg.
TCLP METALS QC: 5.0 mg/L As, Se, Cd, Cr, Pb, Ba; 1.0 mg/L Ag; 0.05 mg/L Hg.

Director, Dr. Blair Leftwich

11-7-97
Date

Received
MAR 1998
Hobbs OCD

Nov-07-97 04:29P

P.03

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
LLANO PERMIAN ENVIRONMENTAL
Attention: Robbie Walker
1031 Andrews Hwy., Ste. 207
Midland, TX 79701

November 7, 1997
Receiving Date: 11/04/97
Sample Type: Sludge
Project No: 101-005
Project Location: Mercury Ave.
Odessa, TX

Extraction Date: 11/04/97
Analysis Date: 11/06/97
Sampling Date: 10/30/97
Sample Condition: I & C
Sample Received by: VW
Project Name: Maintenance

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	IGNITABILITY
	EPA LIMIT =	—	500	250	—	<2 >12.5	—
T84691	MAS-1	Reactive	1,400	960	Non-corrosive	7.8	Non-ignitable
QC	Quality Control	—	—	—	—	7.0	—
RPD		0	0	0	0	0	0
% Extraction Accuracy		—	—	—	—	—	—
% Instrument Accuracy		—	—	—	—	100	—

See letter & un-altered Analysis's

METHODS: EPA SW 846-2.1.3, 2.1.2, 2.1.1.
CHEMIST: JS

Received
Hobbs OCD
MAR 1998
A

Director, Dr. Blair Leftwich

11-7-97
DATE

NOV-07-97 04:29P
P.02

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
LLANO PERMIAN ENVIRONMENTAL
Attention: Robbie Walker
1031 Andrews Hwy., Suite 207
Midland, TX 79701

November 06, 1997
Receiving Date: 11/04/97
Sample Type: Sludge
Project No: 101-005
Project Location: Mercury Avenue
Odessa, TX

Extraction Date: 11/04/97
Analysis Date: 11/05/97
Sampling Date: 10/30/97
Sample Condition: I & C
Sample Received by: VW
Project Name: Maint.

TA#	FIELD CODE	TRPHC (mg/L)
T84691	MAS-1	15,300
QC	Quality Control	104
RPD		0.500
RPD		6
% Extraction Accuracy		107
% Instrument Accuracy		104

METHODS: EPA 418.1.
CHEMIST: MS
TRPHC SPIKE: 250 mg/L TRPHC.
TRPHC SPIKE: 100 mg/L TRPHC.

Director, Dr. Blair Leftwich

11-6-97
DATE

MAR 1998
Received
Hobbs
OCD

TRACE ANALYSIS, INC.
A Laboratory for Advanced Environmental Research and Analysis

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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MAR 2 7 1998
Environmental Bureau
Oil Conservation Division

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Weatherford Enterra
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Snyder facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Fluid Transports
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 2200 Avenue R Snyder	Texas

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Weatherford Enterra Snyder facility. The waste was generated by steam cleaning oil field tools. This material has been approved in the past. I have included a certificate of waste, a chain of custody, and a Texas waste code.

MAR 1998
Received
Hobbs
OCD

03-002

Estimated Volume 100 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

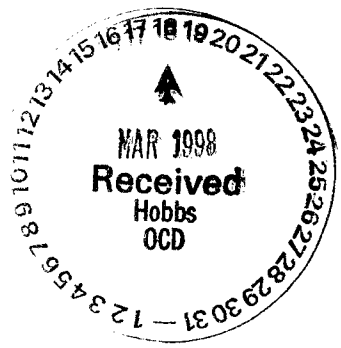
SIGNATURE: Billie Charo TITLE: Environmental Compliance Manager DATE: 03/09/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Field Rep DATE: 3/29/98

APPROVED BY: _____ TITLE: Env. Geologist DATE: 3/27/98


MAR 1998
Received
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LLANO PERMIAN ENVIRONMENTAL

1031 Andrews Highway, Suite 207, Midland, Texas, 79701 O Telephone (915) 522-2133 O Telefax (915) 522-2180

March 04, 1998

Ms. Billy Charo
Controlled Recovery Inc.
P.O. Box 369
Hobbs, New Mexico 88241

RE: Waste Disposal Approval Request

Llano Permian Environmental Services requests approval to dispose of 100bbl (4200 gallons) of waste water and sludge generated by Weatherford Enterra Inc. (Weatherford). Weatherford has generated this waste from washing/steam cleaning oil field tools.

Weatherford generates this waste at:
2200 Avenue R
Snyder, TX 79549-1918
TX ID #80134
EPA ID #TXD000757641

The transporter of this waste will be Fluid Transports of Snyder, Texas. Fluid Transports is at:

P.O. Box 99
Snyder, TX 79550
(915) 573-5421
TX ID #41382
EPA ID #TXD982756744

Please find attached copies of the certificate of waste, Texas Notice of Registration (NOR) analytical data, and chain of custody forms. Should you require additional information or have any questions please contact me at (915)522-2133.

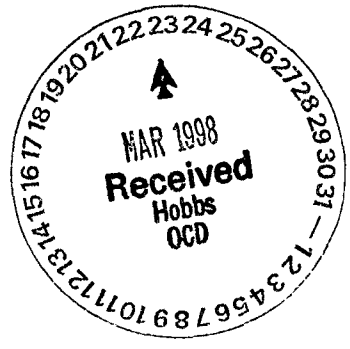
Sincerely,
LLANO-PERMIAN ENVIRONMENTAL SERVICES

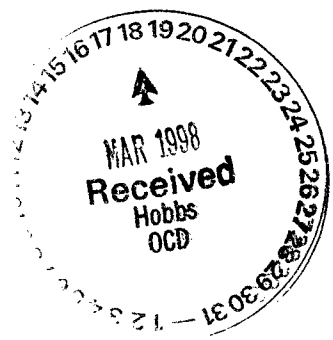
Robbie O. Walker
Environmental Technician

cc: Terry James, Llano-Permian Environmental
File: 101-007

Attachments

LPE

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CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR Weatherford Enterra, Inc.

ADRESS 2200 Avenue R Snyder TX 79549-1918

GENERATING SITE 2200 Avenue R Snyder TX 79549-1918

COUNTY Scurry STATE Texas

TYPE OF WASTE Sludge and waste water

ESTINATED VOLUME 100 bbl (4200 gallons)

GENERATING PROCESS Steam cleaning oil field tools.

REMARKS This waste is from the Snyder facility.

NMOCD FACILITY **CONTROLLED RECOVERY INC.**

TRUCKING COMPANY Fluid Transports (915)573-5421

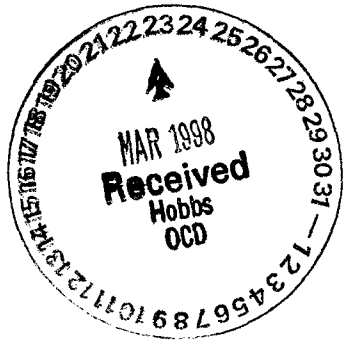
As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous, I further certify that to my Knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40CFR, Section 2613.

AGENT _____
SIGNATURE

NAME Robbie O. Walker
PRINTED

ADDRESS 1031 Andrews Hwy., Ste 207B
Midland, Texas 79701

DATE March 4,1998



0134 Weatherford U.S., Inc.

exas aste ode	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete

***** Active Wastes ******

0163081 1 Active 08/05/94 Off No No
Description from Generator: Empty metal drums and empty metal containers from products purchased. Rendered empty after use of product. Non-hazardous.
Form Code: 308 Empty or crushed metal drums or containers
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

60174061 1 Active 08/05/94 Off No
Description from Generator: Empty fiber or plastic containers from products purchased. Rendered empty after use of product. Non-hazardous.
Form Code: 406 Empty fiber or plastic containers
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

60182961 1 Active 08/05/94 Off No
Description from Generator: Waste glycol based antifreeze/coolant. Removed from facility vehicles and equipment during service and repair. Non-hazardous.
Form Code: 296 Ethylene glycol based antifreeze
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

60196951 1 Active 09/18/95 Off No
Description from Generator: Petroleum contaminated sludge from sump. Tools are steam cleaned & washed to remove lubricant, dirt, paint, scale & corrosion. Liquids are removed &I sludge remains.
Form Code: 695 Petro contam sldg not still bottoms & oily sludges
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Sump sludge

60203071 1 Active 08/05/94 Off No
Description from Generator: Scrap metal. Generated during the manufacture and servicing of oil field tools and equipment. Miscellaneous metal pieces and parts which are no longer useable are scrapped and sent to metal recycler. Non-hazardous.
Form Code: 307 Metal scale, filings, or scrap
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Scrap metal

60219022 2 Active 08/05/94 Off No
Description from Generator: Supplemental plant refuse - primarily solid floor sweepings from plant production operations. Non-hazardous.
Form Code: 902 Supplemental plant production refuse
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

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84256

Page ____ of ____

TraceAnalysis, Inc.

6701 Aberdeen Avenue, Ste. 9 Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

LAB Order ID # 499

Company Name: LP Environmental
Phone #: (915) 522-2133
Address: 1031 Andrews Hwy Ste 207
Fax #: (915) 522-2180
Contact Person: Robbie Walker
Invoice to: (If different from above) Weatherford Enterra Inc 2200 Ave R Snyder TX 79549-1948
Project #: 101-007 attn: Kelly
Project Name: Maint
Project Location: Snyder
Sampler Signature:

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME
84256	SS-1	1	32oz				X				X	10/29	7:45

ANALYSIS REQUEST (Circle or Specify Method No.)

MTBE 8020/602	BTEX 8020/602	TPH	PAH 8270	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	GC.MS Vol. 8240/8260/624	GC/MS Semi. Vol. 8270/625	PCB's 8080/608	Pest. 8080/608	BOD, TSS, PH	Turn Around Time if different from standard	Hold
		X			X	X	X	X							

Relinquished by: Date: 10/29/97 Time: 2:30 PM
Received by: Helen Shelton Date: 10/29/97 Time: 2:30 PM

Relinquished by: Helen Shelton Date: 10/29/97 Time: 6:15PM
Received by: Date: Time:

Relinquished by: Date: Time:
Received at Laboratory by: Vicki Wimbish Date: 10/30/97 Time: 9:20AM

Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C.O.C.

LAB USE ONLY
Intact (Y) N
Headspace Y / N
Temp 3 °
Log-in Review B

REMARKS: Sent to TEP 10/31

P 11-11

303AD

Carrier # Overland 1-800-762-793-7

Received HOBBS OCD MAR 1998 A

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
LLANO PERMIAN ENVIRONMENTAL
Attention: Robbie Walker
1031 Andrews Hwy., Suite 207
Midland, TX 79701

November 11, 1997
Receiving Date: 10/30/97
Sample Type: Sludge
Project No: 101-007
Project Location: Snyder, TX

Extraction Date: 11/05/97
Analysis Date: 11/05/97
Sampling Date: 10/29/97
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: Maint.

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	IGNITABILITY
	EPA LIMIT =	--	500	250	--	<2 >12.5	--
T84256	SS-1	Non-reactive	20	5.0	Non-corrosive	10.5	Nonignitable
QC	Quality Control	--	--	--	--	7.0	--
RPD		0	0	0	0	0	0
% Extraction Accuracy		--	--	--	--	--	--
% Instrument Accuracy		--	--	--	--	100	--

METHODS: EPA SW 846-2.1.3, 2.1.2, 2.1.1.
CHEMIST: JG

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NOV 1997
Hobbs
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Director, Dr. Blair Leftwich

11-11-97
DATE

NOV-11-97 12:52P

P.01

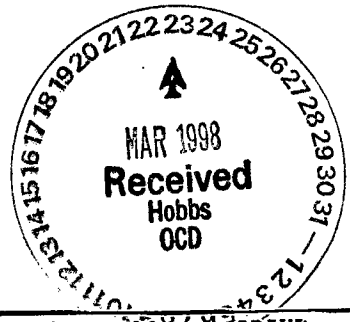
6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
Llano Permian Environmental
Attention Robbie Walker
1031 Andrews Hwy, Ste. 207
Midland Tx.79701

Date: Oct 31, 1997
Date Rec: 10/30/97
Project: 101-007
Proj Name: Maint.
Proj Loc: Snyder, Tx.

Lab Receiving # : 9710000499
Sampling Date: 10/29/97
Sample Condition: Intact and Cool
Sample Received By: VW

TA#	Field Code	MATRIX	TRPHC (mg/Kg)
T84256	SS-1	Sludge	134,000
Method Blank			<0.500
Reporting Limit			10
QC			104



RPD	2
% Extraction Accuracy	3,306
% Instrument Accuracy	104

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC/SPIKE: (mg/L)	QC/SPIKE: (mg/Kg)
TRPHC	EPA 3550	10/30/97	EPA 418.1	10/31/97	MS	100	8.5

Director, Dr. Blair Leftwich

10-31-97
Date

TRACE ANALYSIS, INC.
A Laboratory for Advanced Environmental Research and Analysis

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
LLANO PERMIAN ENVIRONMENTAL
Attention: Robbie Walker
1031 Andrews Hwy., Suite 207
Midland, TX 79701

November 11, 1997
Receiving Date: 10/30/97
Sample Type: Sludge
Project No: 101-007
Project Location: Snyder, TX

Extraction Date: 11/04/97
Analysis Date: 11/05/97
Sampling Date: 10/29/97
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: Maint.

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cd	Cr	Pb	Ag	Ba	Hg
	EPA LIMIT =	5.0	1.0	1.0	5.0	5.0	5.0	100.0	0.20
T84256	SS-1	<0.10	<0.10	<0.02	<0.05	<0.10	<0.01	<0.20	<0.01
QC	Quality Control	4.7	4.8	5.0	4.9	4.8	0.95	4.8	0.05
	Reporting Limit	0.10	0.10	0.02	0.05	0.10	0.01	0.20	0.01
	RPD	2	1	0	0	0	13	1	5
	% Extraction Accuracy	85	100	85	85	85	110	90	88
	% Instrument Accuracy	93	96	100	97	95	95	96	100

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CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba: RR Hg: JT
METHODS: EPA SW 846-1311, 6010B, 7470
TCLP METALS SPIKE: 2.0 mg/L As, Se, Cd, Cr, Pb, Ba; 0.5 mg/L Ag; 0.05 mg/L Hg.
TCLP METALS QC: 5.0 mg/L As, Se, Cd, Cr, Pb, Ba; 1.0 mg/L Ag; 0.05 mg/L Hg.

Director, Dr. Blair Leftwich

11-11-97
Date

NOV-11-97 12:52P
P.03

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
LLANO PERMIAN ENVIRONMENTAL
Attention: Robbie Walker
1031 Andrews Hwy., Suite 207
Midland, TX 79701

November 11, 1997
Receiving Date: 10/30/97
Sample Type: Sludge
Project No: 101-007
Project Location: Snyder, TX

Extraction Date: 11/03/97
Analysis Date: 11/06/97
Sampling Date: 10/29/97
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: Maint.

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T84256 SS-1	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	73	*200	1	91
1,4-Dichlorobenzene	7.5	0.05	ND	72	6	32	90
o-Cresol	200.0	0.05	0.05	85	12	75	106
m,p-Cresol	200.0	0.05	0.35	89	9	59	111
Total Cresol	200.0	0.05	ND	---	---	---	---
Hexachloroethane	3.0	0.05	ND	93	10	24	115
Nitrobenzene	2.0	0.05	ND	89	13	42	111
Hexachlorobutadiene	0.5	0.05	ND	75	20	23	94
2,4,6-Trichlorophenol	2.0	0.05	ND	82	16	43	103
2,4,5-Trichlorophenol	400.0	0.05	ND	75	14	42	94
2,4-Dinitrotoluene	0.13	0.05	ND	94	4	41	118
2,4-D	10.0	0.05	ND	64	6	76	80
Hexachlorobenzene	0.13	0.05	ND	86	17	44	108
2,4,5-TP	1.0	0.05	ND	89	5	116	111
Pentachlorophenol	100.0	0.05	ND	91	5	36	114

***NOTE: RPD out of limits.**
****NOTE: Surrogate recovery out of standard range.**

ND - Not Detected

Surrogates	**% RECOVERY**
2-Fluorophenol	**13
Phenol-d6	41
Nitrobenzene-d5	54
2-Fluorobiphenyl	59
2,4,6-Tribromophenol	66
Terphenyl-d14	104

Methods: EPA SW 846-1311, 8270
CHEMIST: RP/HW

Director, Dr. Blair Leftwich

DATE

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
LLANO PERMIAN ENVIRONMENTAL
Attention: Robbie Walker
1031 Andrews Hwy., Ste. 207
Midland, TX 79701

November 11, 1997
Receiving Date: 10/30/97
Sample Type: Sludge
Project No: 101-007
Project Location: Snyder, TX

Extraction Date: 11/03/97
Analysis Date: 11/04/97
Sampling Date: 10/29/97
Sample Condition: I & C
Sample Received by: VW
Project Name: Maint.

TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T84256 SS-1	QC	RPD	%EA	%IA
Vinyl chloride	0.20	0.05	ND	0.115	14	83	115
1,1-Dichloroethene	0.70	0.05	ND	0.104	13	94	104
Methyl Ethyl Ketone	200.0	0.5	ND	0.104	15	82	104
Chloroform	6.00	0.05	ND	0.097	13	100	97
1,2-Dichloroethane	0.50	0.05	ND	0.100	16	101	100
Benzene	0.50	0.05	ND	0.103	10	100	103
Carbon Tetrachloride	0.50	0.05	ND	0.110	9	115	110
Trichloroethene	0.50	0.05	ND	0.102	9	101	102
Tetrachloroethene	0.70	0.05	ND	0.101	11	101	101
Chlorobenzene	100.00	0.05	ND	0.100	13	99	100
1,4-Dichlorobenzene	7.50	0.05	ND	0.101	14	98	101

SURROGATES	% Recovery
Dibromofluoromethane	92
Toluene-d8	95
4-Bromofluorobenzene	92

ND = NOT DETECTED

METHODS: EPA SW 846-1311, 8260.
CHEMIST: RW

Director, Dr. Blair Leftwich

MAR 1998
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OCD
DATE 11-9

TRACE ANALYSIS, INC.
A Laboratory for Advanced Environmental Research and Analysis

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-1
Originated 8/1

Submit Orig
Plus 1 C
to appropr
District Of

RECEIVED
MAR 27 1998
Environmental Bureau
Oil Conservation Division

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ BY LWP-NMOCD Verbal Approval Received: Yes ☒ No ☐	4. Generator Texaco 5. Originating Site Buckeye CO2 plant
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Unknown
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State NM
7. Location of Material (Street Address or ULSTR) 2705 N West County Road	Hobbs, New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Texaco Buckeye CO2 plant. The material was generated by sandblasting of tanks. I have included a certificate of waste and a chain of custody.

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Sample No on Chain of Custody + Analytical Results Match
H 3416-1 However the Sample Date Does
Not match COC Says 1-20-97
Analysis Says 1-20-98
MJK

Mailed to Hobbs

Estimated Volume 10 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Environmental Compliance Manaer DATE: 03/19/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVT ENGR DATE: 3/27/98

APPROVED BY: Martyne J. Kieling TITLE: Env Geologist DATE: 3/27/98

CERTIFICATE OF WASTE STATUS
NON - EXEMPT WASTE MATERIAL

ORIGINATING LOCATION: 2705 N. WEST COUNTY ROAD

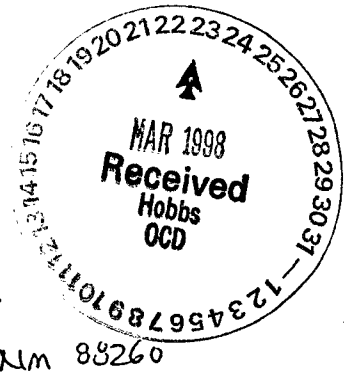
SOURCE: SANDBLASTING OF TANKS

DISPOSAL LOCATION: CONTROLLED RECOVERY INC.

LEA COUNTY, NEW MEXICO

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed persuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardour waste "pursuant tot he provisions of 40 CFR, Section 2613.

I, the undersigned as the agent for TEXACO concur with the status of the waste from the subject site.



Name JOHN E. HEROD

Title PROJECT ENGINEER

Address BUCKEYE CO_2 PLANT

HCR60, BOX 425 40 TEXAS CAMP LOVINGTON, NM 88260

Signature John E Herod

Date 2-3-98

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

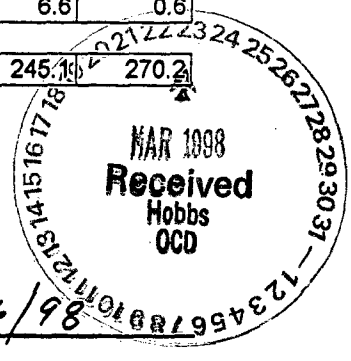
ANALYTICAL RESULTS FOR
TEXACO BUCKEYE CO_2 PLANT
ATTN: JOHN HEROD
WEST STAR RTE. BOX 425
LOVINGTON, NM 88260
FAX TO: 505-393-6036
(SMITH & SONS CONST.& WELDING CO.)

Receiving Date: 01/20/98
Reporting Date: 01/26/98
Project Number: NOT GIVEN
Project Name: NOT GIVEN
Project Location: NOT GIVEN

Sampling Date: 01/20/98
Sample Type: SOLID (SAND)
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: GP/AH

TCLP METALS

LAB NUMBER SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:	01/22/98	01/22/98	01/23/98	01/22/98	01/22/98	01/22/98	01/23/98	01/22/98
EPA LIMITS:	5	5	100	1	5	5	0.2	1
H3416-1 TANK	<1	<1	<5	<0.1	<5	<1	<0.02	<0.1
SANDBLASTING								
Quality Control	0.095	2.53	20.7	1.021	0.99	4.97	0.0089	0.200
True Value QC	0.100	2.50	20.0	1.000	1.00	5.00	0.0100	0.200
% Recovery	95	101	104	102	99	99	89	100
Relative Standard Deviation	0.7	0.3	5.9	0.9	0.7	0.6	6.6	0.6
METHODS: EPA 1311, 600/4-91/(	206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2



Chemist

01/26/98
Date

PLEASE NOTE: Liability 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, 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.

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
TEXACO BUCKEYE CO_2 PLANT
ATTN: JOHN HEROD
WEST STAR RTE. BOX 425
LOVINGTON, NM 88260
FAX TO: 505-393-6036
(SMITH & SONS CONST.& WELDING CO.)

Receiving Date: 01/20/97
Reporting Date: 01/23/98
Project Number: NOT GIVEN
Project Name: NOT GIVEN
Project Location: NOT GIVEN

Sampling Date: 01/20/98
Sample Type: SLUDGE
Sample Condition: COOL & INTACT
Sample Received By: JS
Analyzed By: AH/BC

LAB NUMBER	SAMPLE ID	REACTIVITY Sulfide (ppm)	REACTIVITY Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY (°F)
ANALYSIS DATE:		01/23/98	01/23/98	01/20/98	01/20/98
H3416-1	TANK SAND-BLASTING	<50	<50	7.08	Nonflammable
Quality Control		NR	0.105	6.99	NR
True Value QC		NR	0.100	7.00	NR
% Accuracy		NR	105	100	NR
Relative Percent Difference		NR	0	0.1	NR

METHOD: EPA SW 846-7.3, 7.2, 1030 (Proposed), 1311, *40 CFR 261*

MAR 1998
Received
Hobbs
OCD

Chemist

1/23/98
Date

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H3416R.XLS

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
TEXACO BUCKEYE CO_2 PLANT
ATTN: JOHN HEROD
WEST STAR RTE. BOX 425
LOVINGTON, NM 88260
FAX TO: 505-393-6036
(SMITH & SONS CONST.& WELDING CO.)

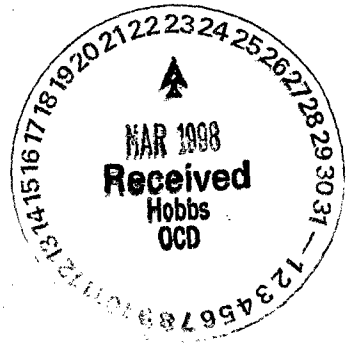
Receiving Date: 01/20/98
Reporting Date: 01/21/98
Project Number: NOT GIVEN
Project Name: NOT GIVEN
Project Location: NOT GIVEN
Lab Number: H3416-1
Sample ID: TANK SANDBLASTING

Analysis Date: 01/21/98
Sampling Date: 01/20/98
Sample Type: SOLID (SAND)
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Sample Result H3416-1	Method Blank	QC	% Recov.	True Value QC
Pyridine	5.00	<0.010	<0 .002	0.028	28	0.100
1,4-Dichlorobenzene	7.50	<0.010	<0 .002	0.048	48	0.100
o-Cresol	200	<0.010	<0 .002	0.055	55	0.100
m, p-Cresol	200	<0.010	<0 .002	0.115	58	0.200
Hexachloroethane	3.00	<0.010	<0 .002	0.044	44	0.100
Nitrobenzene	2.00	<0.010	<0 .002	0.079	79	0.100
Hexachloro-1,3-butadiene	0.500	<0.010	<0 .002	0.051	51	0.100
2,4,6-Trichlorophenol	2.00	<0.010	<0 .002	0.067	67	0.100
2,4,5-Trichlorophenol	400	<0.010	<0 .002	0.072	72	0.100
2,4-Dinitrotoluene	0.130	<0.010	<0 .002	0.112	112	0.100
Hexachlorobenzene	0.130	<0.010	<0 .002	0.081	81	0.100
Pentachlorophenol	100	<0.010	<0 .002	0.091	91	0.100

	% RECOVERY
Fluorophenol	58
Phenol-d5	54
Nitrobenzene-d5	67
2-Fluorobiphenyl	74
2,4,6-Tribromophenol	87
Terphenyl-d14	100

METHODS: EPA SW 846-8270, 1311



Burgess J. A. Cooke, Ph. D.

1/21/98
Date

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

ANALYTICAL RESULTS FOR
TEXACO BUCKEYE CO_2 PLANT
ATTN: JOHN HEROD
WEST STAR RTE. BOX 425
LOVINGTON, NM 88260
FAX TO: 505-393-6036
(SMITH & SONS CONST.& WELDING CO.)

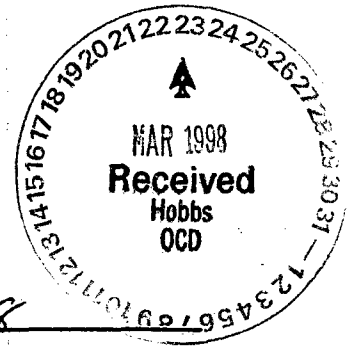
Receiving Date: 01/20/98
Reporting Date: 01/22/98
Project Number: NOT GIVEN
Project Name: NOT GIVEN
Project Location: NOT GIVEN
Lab Number: H3416-1
Sample ID: TANK SANDBLASTING

Analysis Date: 01/22/98
Sampling Date: 01/20/98
Sample Type: SOLID (SAND)
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

TCLP VOLATILES (ppm)	EPA LIMIT	Sample Result H3416-1	Method Blank	QC	%Recov.	True Value QC
Vinyl Chloride	0.20	<0.005	<0.005	0.089	89	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.100	100	0.100
Methyl Ethyl Ketone	200	<0.050	<0.050	0.086	86	0.100
Chloroform	6.0	<0.005	<0.005	0.110	110	0.100
1,2-Dichloroethane	0.5	<0.005	<0.005	0.093	93	0.100
Benzene	0.5	<0.005	<0.005	0.101	101	0.100
Carbon Tetrachloride	0.5	<0.005	<0.005	0.110	110	0.100
Trichloroethylene	0.5	<0.005	<0.005	0.109	109	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.097	97	0.100
Chlorobenzene	100	<0.005	<0.005	0.115	115	0.100
1,4-Dichlorobenzene	7.5	<0.005	<0.005	0.115	115	0.100

	% RECOVERY
Dibromofluoromethane	97
Toluene-d8	102
Bromofluorobenzene	88

METHODS: EPA SW 846-8260, 1311



Burgess J.A. Copke, Ph. D.

1/23/98
Date

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CARDINAL LABORATORIES, INC.

2111 Beechwood, Abilene, TX 79603 101 East Marland, Hobbs, NM 88240
(915) 673-7001 Fax (915) 673-7020 (505) 393-2326 Fax (505) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page ____ of ____

Company Name:	Texaco North America Prod. BixKeye CO_2 Plant	BILL TO	PO #:
Project Manager:	ATTEN: John Heland	Company:	Smith & Sons Const-Welding Inc.
Address:	BixKeye CO_2 Plant	Attn:	Randy Smith
City:	BixKeye State: NM Zip:	Address:	2205 N West County Rd
Phone #:		City:	Hobbs, NM.
Fax #:		State:	NM Zip: 88240
Project #:	Project Owner:	Phone #:	505-397-1852
Project Name:		Fax #:	505-393-6036
Project Location:			

TOLP Compliance

ANALYSIS REQUEST

FOR LAB USE ONLY				MATRIX						PRES.			SAMPLING	
LAB I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID:	ICE / COOL	OTHER:	DATE	TIME
H3916-1	Tank and flutin	X							X				1/20/97	9:00

PLEASE NOTE: Liability 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 the client for the 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 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.

Terms and Conditions: Interest will be charged on all accounts more than 30 days past due at the rate of 24% per annum from the original date of invoice, and all costs of collections, including attorney's fees.

Sampler Relinquished:	Date:	Received By:	Phone Result ☐ Yes ☐ No Additional Fax #:
	Time:		Fax Result: ☐ Yes ☐ No
Relinquished By:	Date: 1/20/97	Received By: (Lab Staff)	REMARKS: Send Fax Report & Bill to Randy Smith
	Time: 9:46 am		
Delivered By: (Circle One)		Sample Condition: Cool ☑ Yes ☐ No; Intact ☒ Yes ☐ No	CHECKED BY: (Initials)
Sampler - UPS - Bus - Other:			

† Cardinal cannot accept verbal changes. Please fax written changes to 915-673-7020.

RECEIVED MAR 1998 Hobbs OCD

JAN-28-98 WED 12:14 SMITH & SONS CONST-WELD 5053971852 P.02

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
MAR 27 1998
Environmental Bureau
Oil Conservation Division

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to appropr
District Of

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ LWP-NMOCD Verbal Approval Received: Yes ☒ No ☐	4. Generator L G & E Natural
	5. Originating Site Hobbs facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Rowland
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 921 Sanger Hobbs	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the L G & E Natural Hobbs Plant. The waste was generated by rain water aught from plant. I have included a certificate of waste and a chain of custody. This material has been approved in the past.

03-007

MAR 1998
Received
Hobbs
OCD

Mailed to Hobbs - 3-30-98

Estimated Volume 100 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Environmental Compliance Manager DATE: 03/17/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env. Engr. DATE: 3/24/98

APPROVED BY: DENIED MJK TITLE: Waste water Sample Analysis is over 1 year old Please Reanalize & Submit Again MJK DATE: _____

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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Originated 8/1

Submit Orig
Plus 1 C
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District Of

RECEIVED
MAR 27 1998
Environmental Bureau
Oil Conservation Division

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ LWP - NMOCD Verbal Approval Received: Yes ☒ No ☐	4. Generator L G & E Natural
	5. Originating Site Hobbs facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Rowland
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 921 Sanger Hobbs	New Mexico

9. Circle One:

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B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the L G & E Natural Hobbs Plant. The waste was generated by rain water aught from plant. I have included a certificate of waste and a chain of custody. This material has been approved in the past.

03-008

MAR 1998
Received
Hobbs
OCD

Mailed to Hobbs

Estimated Volume 100 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo Waste Management Facility Authorized Agent TITLE: Environmental Compliance Manager DATE: 03/17/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR DATE: 3/24/98

DENIED

Waste water Sample Analysis is over 1 year old

APPROVED BY: _____ TITLE: Please Reanalize & Submit Again DATE: MK

Kieling, Martyne

From: Price, Wayne
Sent: Thursday, April 02, 1998 4:00 PM
To: Martyne Kieling
Cc: Chris Williams
Subject: CRI C-138 s LG&E Denials

Re: CRI #'s 03-008, 03-007

Dear Martyne,

Per our telephone conversation I am approving the two c-138's since I had already given verbal approval. I have informed CRI that LG&E will need new current analyticals.

Thanks!

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
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New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
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MAR 2 7 1998
Environmental Bureau
Oil Conservation Division

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Left NMOCD Verbal Approval Received: Yes ☒ No ☐	4. Generator L G & E Natural
	5. Originating Site Apex Station
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Rowland
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 921 Sanger Hobbs	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the L G & E Natural Hobbs Plant Apex Station. The waste was generated by rain water caught from Apex Station contaminated skids. I have included a certificate of waste and a chain of custody. This material has been approved in the past.

03-006

MAR 1998 Received Hobbs OCD

Mailed to Hobbs

Estimated Volume 100 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

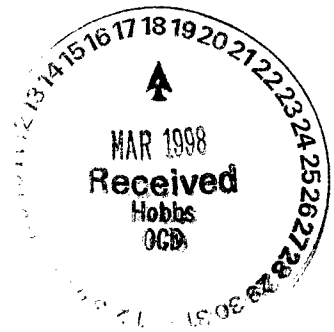
SIGNATURE: Billie Charo TITLE: Environmental Compliance Manager DATE: 03/17/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Field Engr DATE: 3/27/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 3/27/98


MAR 1998
Received
Hobbs
OCD

CERTIFICATE OF WASTE STATUS
NON-EMEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY / GENERATOR L G & E Natural

ADDRESS 921 West Sanger Hobbs, New Mexico

GENERATING SITE Apex Station

COUNTY Lea STATE New Mexico

TYPE OF WASTE Rain Water

ESTIMATED VOLUME 100 BBLS

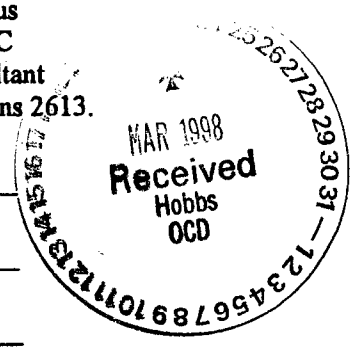
GENERATING PROCESS Rain water caught from Apex Station contaminated skids

REMARKS

NMOCD FACILITY Controlled Recovery, Inc.

TRUCKING COMPANY Rowland Trucking

As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Sections 2613.



AGENT _____
SIGNATURE

NAME Ed Sloman
PRINTED

ADDRESS 921 West Sanger Hobbs, New Mexico

DATE February 6, 1998

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1816
HOBBS, NM 88241
FAX TO: 505-397-2597

Receiving Date: 08/08/97
Reporting Date: 08/12/97
Project Number: LG&E NAT. GAS
Project Name: APEX STATION
Project Location: HOBBS PLANT
Lab Number: H3115-1
Sample ID: SHOP OIL/RAIN WATER TANK

Analysis Date: 08/11/97
Sampling Date: 08/08/97
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

TCLP VOLATILES (ppm)	EPA LIMIT	Sample Result H3115-1	Method Blank	QC	%Recov.	True Value QC
Vinyl Chloride	0.20	<0.005	<0.005	0.102	102	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.106	106	0.100
Methyl Ethyl Ketone	200	0.593	<0.050	0.106	106	0.100
Chloroform	6.0	<0.005	<0.005	0.100	100	0.100
1,2-Dichloroethane	0.5	<0.005	<0.005	0.102	102	0.100
Benzene	0.5	0.006	<0.005	0.107	107	0.100
Carbon Tetrachloride	0.5	<0.005	<0.005	0.106	106	0.100
Trichloroethylene	0.5	<0.005	<0.005	0.103	103	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.103	103	0.100
Chlorobenzene	100	<0.005	<0.005	0.101	101	0.100
1,4-Dichlorobenzene	7.5	<0.005	<0.005	0.099	99	0.100

	% RECOVERY
Dibromofluoromethane	82
Toluene-d8	94
Bromofluorobenzene	83

METHODS: EPA SW 846-8260, 1311

Burgess J. A. Cooke, Ph. D.

6/12/97
Date

MAR 1998
Received
Hobbs
OCD

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

ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1816
HOBBS, NM 88241
FAX TO: 505-397-2597

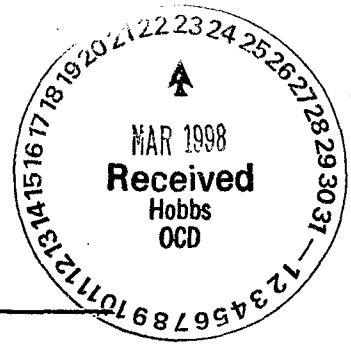
Receiving Date: 08/06/97
Reporting Date: 08/09/97
Project Number: LG&E NAT. GAS
Project Name: APEX STATION
Project Location: HOBBS PLANT
Lab Number: H3115-1
Sample ID: SHOP OIL/RAIN WATER TANK

Analysis Date: 08/09/97
Sampling Date: 08/06/97
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Sample Result H3115-1	Method Blank	QC	% Recov.	True Value QC
Pyridine	5.00	<0.008	<0.002	0.047	47	0.100
1,4-Dichlorobenzene	7.50	<0.008	<0.002	0.051	51	0.100
o-Cresol	200	<0.008	<0.002	0.085	85	0.100
m, p-Cresol	200	0.236	<0.002	0.158	79	0.200
Hexachloroethane	3.00	<0.008	<0.002	0.052	52	0.100
Nitrobenzene	2.00	<0.008	<0.002	0.088	88	0.100
Hexachloro-1,3-butadiene	0.500	<0.008	<0.002	0.058	58	0.100
2,4,6-Trichlorophenol	2.00	<0.008	<0.002	0.098	98	0.100
2,4,5-Trichlorophenol	400	<0.008	<0.002	0.102	102	0.100
2,4-Dinitrotoluene	0.130	<0.008	<0.002	0.104	104	0.100
Hexachlorobenzene	0.130	<0.008	<0.002	0.102	102	0.100
Pentachlorophenol	100	<0.008	<0.002	0.104	104	0.100

	% RECOVERY
Fluorophenol	46
Phenol-d5	94
Nitrobenzene-d5	102
2-Fluorobiphenyl	89
2,4,6-Tribromophenol	87
Terphenyl-d14	106

METHODS: EPA SW 846-8270, 1311



Burgess J. A. Cooke, Ph. D.

9/9/97
Date

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CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1616
HOBBS, NM 88241
FAX TO: 505-397-2597

Receiving Date: 08/08/97
Reporting Date: 08/12/97
Project Number: LG&E NAT. GAS
Project Name: APEX STATION
Project Location: HOBBS PLANT

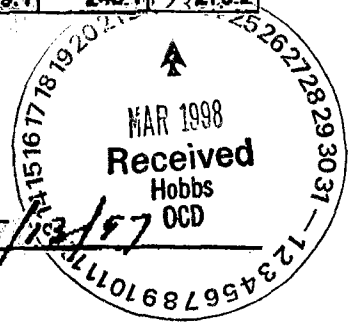
Sampling Date: 08/08/97
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: GP

TCLP METALS

LAB NO.	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:		08/09/97	08/09/97	08/09/97	08/09/97	08/09/97	08/09/97	08/11/97	08/09/97
EPA LIMITS:		5	5	100	1	5	5	0.2	1
H3115-1	SHOP OIL/RAIN WATER TANK	<1	<1	<5	<0.1	<1	<1	<0.02	<0.1
Quality Control		0.093	1.04	19.70	1.001	0.99	2.05	0.0091	0.092
True Value QC		0.100	1.00	20.00	1.000	1.00	2.00	0.0100	0.100
% Recovery		93	104	98	99	99	103	91	92
Relative Standard Deviation		1.4	0.7	11.5	1.2	0.8	1.1	1.6	2.4
METHODS: EPA 1311, 600/4-91/0		206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2

Gayle A. Potter, Chemist

Date 08/12/97



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ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1616
HOBBS, NM 88241
FAX TO: 505-397-2597

Receiving Date: 08/08/97
Reporting Date: 08/14/97
Project Number: LG&E NAT. GAS
Project Name: APEX STATION
Project Location: HOBBS PLANT

Sampling Date: 08/08/97
Sample Type: LIQUID
Sample Condition: COOL, INTAC
Sample Received By: BC
Analyzed By: BC/GP

LAB NUMBER	SAMPLE ID	REACTIVITY Sulfide (ppm)	REACTIVITY Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY (°F)
ANALYSIS DATE:		8/9/97	8/9/97	8/13/97	8/13/97
H3115-1	SHOP OIL/RAIN WATER TANK	<50	<50	6.31	>140
Quality Control		NR	0.105	7.02	NR
True Value QC		NR	0.100	7.00	NR
% Accuracy		NR	105	100	NR
Relative Percent Difference		NR	0	0.2	NR

METHOD: EPA SW 846-7.3, 7.2, 1010, 1311, *40 CFR 261*

Chemist

MAR 1998
Received
Hobbs
OCD

08/14/97
Date

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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

H 3115

Page ___ of ___

Company Name: WEC	BILL TO: PO #: Consultants
Project Manager: Allen Hodge	Company: Western Environmental
Address: P.O. Box 1816	Attn: Allen Hodge
City: Hobbs State: NM Zip: 88241	Address: P.O. Box 1816
Phone #: 392-5021	City: Hobbs.
Fax #: 397-2597	State: N M Zip: 8 8241
Project #: Lea-E NAT.	Phone #: 505 392 5021
Project Name: APEX STATION	Fax #: 505 397 2597
Project Location: Hobbs PLANT	

LAB I.D. #	Sample I.D.	COMP(C) OR GRAB(G)	# CONTAINERS	MATRIX: GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	PRESERVATIVE: ACID:	ICE / COOL	OTHER:	SAMPLING: DATE	TIME	ANALYSIS REQUEST: TCLP VOL	TCLP SVOL	TCLP METALS	RCI	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18
H-3115-1	SLOP OIL/RAIN WATER TANK	C	3		X						X		8-8-97	4:30 PM	1				

Received HOBBS OCD MAR 1998

PLEASE NOTE: Liability 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, 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.

Sampler Relinquished:	Date: 8-8-97	Received By:	Phone Result: ☐ Yes ☐ No Additional Fax #:
	Time: 4:30 PM		Fax Results: ☐ Yes ☐ No
Relinquished By:	Date:	Received By: (Lab Staff)	REMARKS: THIS SAMPLE WAS TAKEN FROM THE SLOP OIL/RAIN WATER TANK THAT RAN OVER.
	Time:		
Delivered By: (Circle One) UPS - Fed Ex - Bus - Other:		Sample Condition: Cool ☒ Yes ☐ No; Intact ☒ Yes ☐ No	CHECKED BY: (Initials)

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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Environmental Bureau
Oil Conservation Division

Form C-1
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to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ LWP-NMOCD Verbal Approval Received: Yes ☒ No ☐	4. Generator L G & E Natural
	5. Originating Site Apex Station
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Rowland
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 921 Sanger Hobbs	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the L G & E Natural Hobbs Plant Apex Station. The waste was generated by rain water caught from Apex Station contaminated skids. I have included a certificate of waste and a chain of custody. This material has been approved in the past.

03-005

MAR 1998 Received Hobbs OCD

Estimated Volume 100 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Environmental Compliance Manager DATE: 03/17/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env Engr DATE: 9/24/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 9/27/98

mailed to Hobbs

CERTIFICATE OF WASTE STATUS
NON-EMEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY / GENERATOR L G & E Natural

ADDRESS 921 West Sanger Hobbs, New Mexico

GENERATING SITE Apex Station

COUNTY Lea STATE New Mexico

TYPE OF WASTE Rain Water

ESTIMATED VOLUME 100 BBLS

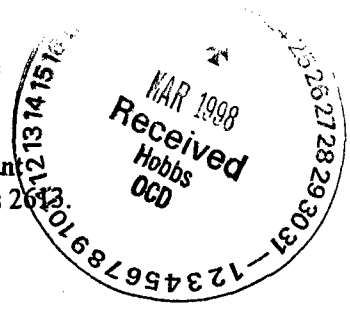
GENERATING PROCESS Rain water caught from Apex Station contaminated skids

REMARKS

NMOCD FACILITY Controlled Recovery, Inc.

TRUCKING COMPANY Rowland Trucking

As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Sections 261.



AGENT _____
SIGNATURE

NAME Ed Sloman
PRINTED

ADDRESS 921 West Sanger Hobbs, New Mexico

DATE February 5, 1998

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1816
HOBBS, NM 88241
FAX TO: 505-397-2597

Receiving Date: 08/08/97
Reporting Date: 08/12/97
Project Number: LG&E NAT. GAS
Project Name: APEX STATION
Project Location: HOBBS PLANT
Lab Number: H3115-1
Sample ID: SHOP OIL/RAIN WATER TANK

Analysis Date: 08/11/97
Sampling Date: 08/08/97
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

TCLP VOLATILES (ppm)	EPA LIMIT	Sample Result H3115-1	Method Blank	QC	%Recov.	True Value QC
Vinyl Chloride	0.20	<0.005	<0.005	0.102	102	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.106	106	0.100
Methyl Ethyl Ketone	200	0.593	<0.050	0.106	106	0.100
Chloroform	6.0	<0.005	<0.005	0.100	100	0.100
1,2-Dichloroethane	0.5	<0.005	<0.005	0.102	102	0.100
Benzene	0.5	0.006	<0.005	0.107	107	0.100
Carbon Tetrachloride	0.5	<0.005	<0.005	0.106	106	0.100
Trichloroethylene	0.5	<0.005	<0.005	0.103	103	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.103	103	0.100
Chlorobenzene	100	<0.005	<0.005	0.101	101	0.100
1,4-Dichlorobenzene	7.5	<0.005	<0.005	0.099	99	0.100

	% RECOVERY
Dibromofluoromethane	82
Toluene-d8	94
Bromofluorobenzene	83

METHODS: EPA SW 846-8260, 1311

Burgess J. A. Cooke, Ph. D.

6/12/97
Date

MAR 1998
Received
Hobbs
OCD

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WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1816
HOBBS, NM 88241
FAX TO: 505-397-2597

Receiving Date: 08/08/97
Reporting Date: 08/09/97
Project Number: LG&E NAT. GAS
Project Name: APEX STATION
Project Location: HOBBS PLANT
Lab Number: H3115-1
Sample ID: SHOP OIL/RAIN WATER TANK

Analysis Date: 08/09/97
Sampling Date: 08/08/97
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Sample Result H3115-1	Method Blank	QC	% Recov.	True Value QC
Pyridine	5.00	<0.008	<0.002	0.047	47	0.100
1,4-Dichlorobenzene	7.50	<0.008	<0.002	0.051	51	0.100
o-Cresol	200	<0.008	<0.002	0.085	85	0.100
m, p-Cresol	200	0.236	<0.002	0.158	79	0.200
Hexachloroethane	3.00	<0.008	<0.002	0.052	52	0.100
Nitrobenzene	2.00	<0.008	<0.002	0.088	88	0.100
Hexachloro-1,3-butadiene	0.500	<0.008	<0.002	0.058	58	0.100
2,4,6-Trichlorophenol	2.00	<0.008	<0.002	0.098	98	0.100
2,4,5-Trichlorophenol	400	<0.008	<0.002	0.102	102	0.100
2,4-Dinitrotoluene	0.130	<0.008	<0.002	0.104	104	0.100
Hexachlorobenzene	0.130	<0.008	<0.002	0.102	102	0.100
Pentachlorophenol	100	<0.008	<0.002	0.104	104	0.100

	% RECOVERY
Fluorophenol	46
Phenol-d5	94
Nitrobenzene-d5	102
2-Fluorobiphenyl	89
2,4,6-Tribromophenol	87
Terphenyl-d14	106

METHODS: EPA SW 846-8270, 1311

MAR 1998
Received
Hobbs
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Burgess J. A. Cooke, Ph. D.

9/4/97
Date

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

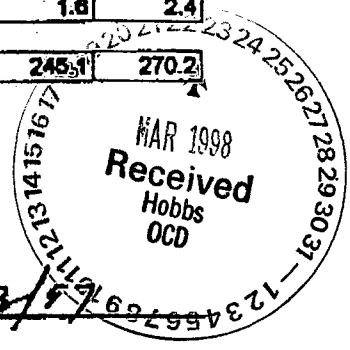
ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1616
HOBBS, NM 88241
FAX TO: 505-397-2597

Receiving Date: 08/08/97
Reporting Date: 08/12/97
Project Number: LG&E NAT. GAS
Project Name: APEX STATION
Project Location: HOBBS PLANT

Sampling Date: 08/08/97
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: GP

TCLP METALS

LAB NO.	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:		08/09/97	08/09/97	08/09/97	08/09/97	08/09/97	08/09/97	08/11/97	08/09/97
EPA LIMITS:		5	5	100	1	5	5	0.2	1
H3115-1	SHOP OIL/RAIN WATER TANK	<1	<1	<5	<0.1	<1	<1	<0.02	<0.1
Quality Control		0.093	1.04	19.70	1.001	0.99	2.05	0.0091	0.092
True Value QC		0.100	1.00	20.00	1.000	1.00	2.00	0.0100	0.100
% Recovery		93	104	98	99	99	103	91	92
Relative Standard Deviation		1.4	0.7	11.5	1.2	0.8	1.1	1.6	2.4
METHODS: EPA 1311, 600/4-91/0		206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2



Gayle A. Potter, Chemist

Date 08/13/98

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ATTN: ALLEN HODGE
P.O. BOX 1816
HOBBS, NM 88241
FAX TO: 505-397-2597

Receiving Date: 08/08/97
Reporting Date: 08/14/97
Project Number: LG&E NAT. GAS
Project Name: APEX STATION
Project Location: HOBBS PLANT

Sampling Date: 08/08/97
Sample Type: LIQUID
Sample Condition: COOL, INTAC
Sample Received By: BC
Analyzed By: BC/GP

LAB NUMBER	SAMPLE ID	REACTIVITY Sulfide (ppm)	Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY (°F)
ANALYSIS DATE:		8/9/97	8/9/97	8/13/97	8/13/97
H3115-1	SHOP OIL/RAIN WATER TANK	<50	<50	6.31	>140
Quality Control		NR	0.105	7.02	NR
True Value QC		NR	0.100	7.00	NR
% Accuracy		NR	105	100	NR
Relative Percent Difference		NR	0	0.2	NR

METHOD: EPA SW 846-7.3, 7.2, 1010, 1311, *40 CFR 261*

MAR 1998
Received
Hobbs
OCD

Chemist

08/14/97
Date

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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

H 3115

Page ___ of ___

Company Name:	WEC	BILL TO #:	PO #: Consultants
Project Manager:	Allen Hodge	Company:	Western Environmental
Address:	P.O. Box 1816	Attn:	Allen Hodge
City:	Hobbs State: NM Zip: 88241	Address:	P.O. Box 1816
Phone #:	392-5021	City:	Hobbs.
Fax #:	397-2597	State:	N M Zip: 8 8241
Project #:	Lea E NAT.	Phone #:	505 392 5021
Project Name:	APEX STATION	Fax #:	505 397 2597
Project Location:	Hobbs PLANT		

ANALYSIS REQUEST

Received
MAR 1998
Hobbs
OCD

LAB I.D. #	Sample I.D.	COMP(C) OR GRAB(G)	# CONTAINERS	MATRIX: GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	PRESERVATIVE: ACID:	ICE / COOL	OTHER:	SAMPLING: DATE	TIME	TCLP VOL	TCLP SVOC	TCLP METALS	RCI
H-3115-1	SLOP OIL/RAIN WATER TANK	C	3		X						X		8-8-97	4:30 PM	1	1	1	1

PLEASE NOTE: Liability 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, 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.

Sampler Relinquished:	Date: 8-8-97	Received By:	Phone Result: ☐ Yes ☐ No	Additional Fax #:	
Relinquished By:	Time: 4:30 PM		Fax Results: ☐ Yes ☐ No		
	Date:	Received By: (Lab Staff)	REMARKS: THIS SAMPLE WAS TAKEN FROM THE SLOP OIL/RAIN WATER TANK THAT RAN OVER.		
	Time:				
Delivered By: (Circle One)	Sample Condition: Cool: ☒ Yes ☐ No	Intact: ☒ Yes ☐ No	CHECKED BY: (Initials)		
UPS - Fed Ex - Bus - Other:					

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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Environmental Bureau
Oil Conservation Division

Form C-1
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Submit Orig
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to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Baker Oil Tools
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Hobbs Yard
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Rowland
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 507 W county Road Hobbs	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Baker Oil Tools Hobbs yard. The waste was generated by steaming tools. This material has been approved in the past. I have included a certificate of waste and a chain of custody.

03-003

MAR 1998 Received Hobbs OCD

Estimated Volume 60 BBLS cy Known Volume (to be entered by the operator at the end of the haul) ——— cy

Sent to Hobbs 3/16/98

SIGNATURE: Billie Charo
Waste Management Facility Authorized Agent
TITLE: Environmental Compliance Manager DATE: 03/11/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: [signature] TITLE: Env Engr DATE: 3/13/98

APPROVED BY: [signature] TITLE: Env Geologist DATE: 3/16/98

BAKER OIL TOOLS

FAX TRANSMITTAL MEMO

HOBBS, NEW MEXICO

Telephone: 505-397-3671 • Fax: 505-393-4213

Date:	3-9-98		
To:	Billie Charo	**From:**	Ray Dockery
Location:		**Ref:**	
Company:	CRI	**Subject:**	Sump disposal
Fax No.:	393-3615	**# pgs:(inc. this pg)**	2
Copy:			

The waste we are sending remains the same as previously tested.

Ray Dockery

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR Baker Oil Tools

ADDRESS P O Box 1828 Hobbs, NM 88240

GENERATING SITE 507 West County Road Hobbs

COUNTY Lea **STATE** NM

TYPE OF WASTE Sump Water

ESTIMATED VOLUME 60 bbls

GENERATING PROCESS steaming tools

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY Rowland Trucking

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT Ray Dockery
SIGNATURE

NAME Ray Dockery
PRINTED

ADDRESS P O Box 1828

Hobbs, NM 88240

DATE 3-9-98

MAR 1998
Received
Hobbs
OCD

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
BAKER OIL TOOLS
ATTN: BILL RUSSELL
507 W. COUNTY ROAD
HOBBS, NM 88240
FAX TO: 505-393-4213

Receiving Date: 02/05/98
Reporting Date: 02/13/98
Project Number: NOT GIVEN
Project Name: WASH BAY
Project Location: HOBBS, NM

Sampling Date: 02/05/98
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: GP/AH

TCLP METALS

LAB NUMBER	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:		02/12/98	02/06/98	02/11/98	02/12/98	02/12/98	02/12/98	02/10/98	02/06/98
EPA LIMITS:		5	5	100	1	5	5	0.2	1
H3444-1	WASHBAY	<1	<1	<5	<0.1	<1	<1	<0.02	<0.01
Quality Control		0.095	2.358	4.945	2.025	5.026	5.006	0.0087	0.0485
True Value QC		0.100	2.500	5.000	2.000	5.000	5.000	0.0100	0.0500
% Recovery		95	94	99	101	101	100	87	97
Relative Standard Deviation		7.5	0.5	14.6	0.9	1.9	4.7	8.9	10.1
METHODS: EPA 1311, 600/4-91/0		206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2

Chemist

MAR 1998 Received Hobbs OCD

2/13/98
Date

PLEASE NOTE: **Liability 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, 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
BAKER OIL TOOLS
ATTN: BILL RUSSELL
507 W. COUNTY ROAD
HOBBS, NM 88240
FAX TO: 505-393-4213

Receiving Date: 02/05/98
Reporting Date: 02/07/98
Project Number: NOT GIVEN
Project Name: WASH BAY
Project Location: HOBBS, NM
Lab Number: H3444-1
Sample ID: WASH BAY

Analysis Date: 02/06/98
Sampling Date: 02/05/98
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC

TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Sample Result H3444-1	Method Blank	QC	% Recov.	True Value QC
Pyridine	5.00	<0.008	<0.002	0.028	28	0.100
1,4-Dichlorobenzene	7.50	<0.008	<0.002	0.052	52	0.100
o-Cresol	200	0.011	<0.002	0.055	55	0.100
m, p-Cresol	200	0.008	<0.002	0.115	58	0.200
Hexachloroethane	3.00	<0.008	<0.002	0.050	50	0.100
Nitrobenzene	2.00	<0.008	<0.002	0.079	79	0.100
Hexachloro-1,3-butadiene	0.500	<0.008	<0.002	0.063	63	0.100
2,4,6-Trichlorophenol	2.00	<0.008	<0.002	0.067	67	0.100
2,4,5-Trichlorophenol	400	<0.008	<0.002	0.072	72	0.100
2,4-Dinitrotoluene	0.130	<0.008	<0.002	0.106	106	0.100
Hexachlorobenzene	0.130	<0.008	<0.002	0.088	88	0.100
Pentachlorophenol	100	<0.008	<0.002	0.091	91	0.100

	% RECOVERY
Fluorophenol	29
Phenol-d5	29
Nitrobenzene-d5	71
2-Fluorobiphenyl	72
2,4,6-Tribromophenol	76
Terphenyl-d14	97

METHODS: EPA SW 846-8270, 1311, 3510

MAR 1998 Received Hobbs OCD

Burgess J. A. Cooke, Ph. D.

2/7/98
Date

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CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
BAKER OIL TOOLS
ATTN: BILL RUSSELL
507 W. COUNTY ROAD
HOBBS, NM 88240
FAX TO: 505-393-4213

Receiving Date: 02/05/98
Reporting Date: 02/05/98
Project Number: NOT GIVEN
Project Name: WASH BAY
Project Location: HOBBS, NM
Lab Number: H3444-1
Sample ID: WASH BAY

Analysis Date: 02/05/98
Sampling Date: 02/05/98
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC

TCLP VOLATILES (ppm)	EPA LIMIT	Sample Result H3444-1	Method Blank	QC	%Recov.	True Value QC
Vinyl Chloride	0.20	<0.005	<0.005	0.103	103	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.087	87	0.100
Methyl Ethyl Ketone	200	0.055	<0.050	0.114	114	0.100
Chloroform	6.0	<0.005	<0.005	0.106	106	0.100
1,2-Dichloroethane	0.5	<0.005	<0.005	0.097	97	0.100
Benzene	0.5	0.009	<0.005	0.107	107	0.100
Carbon Tetrachloride	0.5	<0.005	<0.005	0.100	100	0.100
Trichloroethylene	0.5	<0.005	<0.005	0.112	112	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.095	95	0.100
Chlorobenzene	100	<0.005	<0.005	0.116	116	0.100
1,4-Dichlorobenzene	7.5	<0.005	<0.005	0.112	112	0.100

	% RECOVERY
Dibromofluoromethane	111
Toluene-d8	110
Bromofluorobenzene	97

METHODS: EPA SW 846-8260, 1311

MAR 1998 Received Hobbs OCD

Burgess J. A. Cooke, Ph. D.

2/5/98
Date

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CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

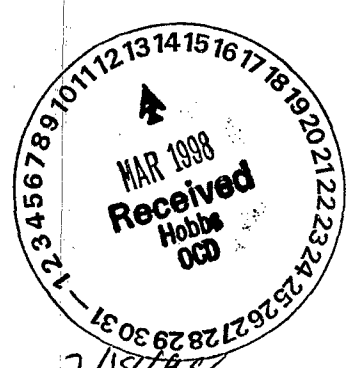
ANALYTICAL RESULTS FOR
BAKER OIL TOOLS
ATTN: BILL RUSSELL
507 W. COUNTY ROAD
HOBBS, NM 88240
FAX TO: 505-393-4213

Receiving Date: 02/05/98
Reporting Date: 02/18/98
Project Number: NOT GIVEN
Project Name: WASH BAY
Project Location: HOBBS, NM

Sampling Date: 02/05/98
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC/HM

LAB NUMBER	SAMPLE ID	REACTIVITY Sulfide (ppm)	REACTIVITY Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY (°F)
ANALYSIS DATE:		02/13/98	02/13/98	02/17/98	02/18/98
H3444-1	WASHBAY	<50	<50	7.26	>140
Quality Control		NR	0.105	7.01	NR
True Value QC		NR	0.100	7.00	NR
% Accuracy		NR	105	100	NR
Relative Percent Difference		NR	0	0.2	NR

METHOD: EPA SW 846-7.3, 7.2, 1010, 1311, *40 CFR 261*



Chemist

2/18/98
Date

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CARDINAL LABORATORIES, INC.

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

2111 Beechwood, Abilene, TX 79603 (915) 673-7001 Fax (915) 673-7020
101 East Marland, Hobbs, NM 88240 (505) 393-2326 Fax (505) 393-2476

Page ____ of ____

Company Name:	BAKER OIL TOOLS	BILL TO	PO #:
Project Manager:	BILL RUSSELL	Company:	BAKER
Address:	507 W County Road	Attn:	
City:	HOBBS State: NM Zip: 88240	Address:	P.O. Box 1828
Phone #:	505-397-3671	City:	HOBBS
Fax #:	505-393-4213	State:	NM Zip:
Project #:	WASH BAY Project Owner:	Phone #:	
Project Name:		Fax #:	
Project Location:	HOBBS		

ANALYSIS REQUEST

TCLP (Chlorides)

Received
FEB 1996
OCD
Hobbs

FOR LAB USE ONLY				MATRIX						PRES.			SAMPLING	
LAB I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID:	ICE / COOL	OTHER :	DATE	TIME
H13444-1	WASH BAY	G	4		✓						✓		02/05/96	11:30

PLEASE NOTE: Liability 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 the client for the 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 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequental 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.

Terms and Conditions: Interest will be charged on all accounts more than 30 days past due at the rate of 24% per annum from the original date of invoice, and all costs of collections, including attorney's fees.

Sampler Relinquished:	Date:	Received By:	Phone Result ☐ Yes ☐ No Additional Fax #:
	Time:		Fax Result: ☐ Yes ☐ No
Relinquished By: Bill Russell	Date:	Received By: (Lab Staff)	REMARKS: Copy to CRI
	Time:		
Delivered By: (Circle One)	Sample Condition Cool: ☐ Yes ☐ No Intact: ☐ Yes ☐ No	CHECKED BY: (Initials)	
Sampler - UPS - Bus - Other:			

† Cardinal cannot accept verbal changes. Please fax written changes to 915-673-7020.

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
MAY 01 1998
Environmental Bureau
Oil Conservation Division

Form C-
Originated 8

Submit Or
Plus 1
to appro
District (

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ OK LWPRICE	4. Generator Weatherford Enterra
Verbal Approval Received: Yes ☒ No ☐	5. Originating Site Odessa
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Malco & Henderson
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 8870 West Loop 338 North	Odessa Texas

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

LWP

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Weatherford Enterra Odessa facility. The waste was generated by washing / steam cleaning oilfield tools. I have included a certificate of waste, a chain of custody, and a Texas waste code.

02-022

APR 1998
Received
Hobbs
OCD

Printed in Hobbs 5-1-98

Estimated Volume 400 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

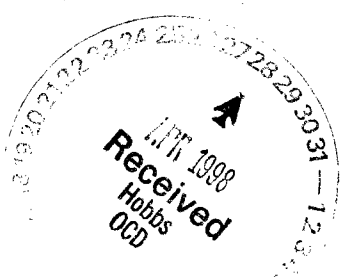
SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Environmental Compliance Manager DATE: 02/25/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR DATE: 4/28/98

APPROVED BY: _____ TITLE: Env. Geologist DATE: 5/1/98


APR 1998
Received
Hobbs
OCD

Fishing & Rental Services

Weatherford Enterra

Weatherford Enterra U.S., Inc.
8870 West Loop 338 North
Odessa, Texas 79764

P.O. Drawer 112
Odessa, Texas 79760

915/550-9297
Telefax: 915/550-9323

February 20, 1998

Ms. Billy Charo
Controlled Recovery Inc.
P.O. Box 369
Hobbs, New Mexico 88241

RE: Waste Disposal Approval Request

Weatherford requests approval to dispose of 400 bbl (16,800 gallons) of waste water and sludge generated by Weatherford . Weatherford has generated this waste from washing/steam cleaning oil field tools.

Weatherford generates this waste at:
8870 West Loop 338 North
Odessa, Texas 79764
TX ID #75327
EPA ID # TXD988025755

The transports of this waste will be Henderson Environmental of Lubbock, Texas and Malco Trucking of Odessa.

Henderson Environmental is at:
P.O. Box 2507
Lubbock, Tx 79408
(806) 744-6278
TX ID #83346
EPA ID # TXD000006411

Malco Trucking Inc. is at:
P.O. Box 14787
Odessa, Tx 79768
(915) 563-9220
TX ID #76665
EPA ID # TXD988042339

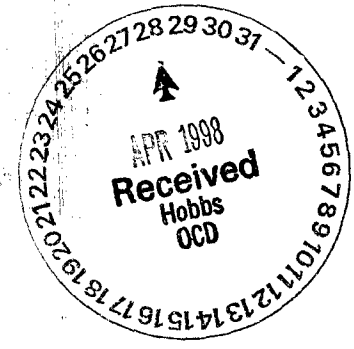
Please find attached copies of the certificate of waste, Texas Notice of Registration (NOR) analytical data, and chain of custody forms. Should you require additional information or have any questions please contact me (915) 550-9297.

Sincerely,

Carolyn Burke

Carolyn Burke
Environmental

Attachments



CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR **WEATHERFORD**

ADDRESS **8870 WEST LOOP 338 ODESSA, TX. 79764**

GENERATING SITE **8870 WEST LOOP 338 ODESSA, TX 79764**

COUNTY **ECTOR** STATE **TEXAS**

TYPE OF WASTE **SLUDGE AND WASTE WATER**

ESTIMATED VOLUME **400 BBL. (16,800 GALLONS)**

GENERATING PROCESS **STEAM CLEANING OIL FIELD TOOLS**

REMARKS

NMOCD FACILITY **CONTROLLED RECOVERY INC.**

TRUCKING COMPANY **MALCO (915)563-9220, HENDERSON (806)744-6278**

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will by analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT Carolyn Burke

SIGNATURE

NAME **CAROLYN BURKE**

PRINTED

ADDRESS **8870 WEST LOOP 338 N**

ODESSA, TX. 79764

DATE **2/20/98**

ANALYTICAL REPORT 1-71344

for

Nickell Environmental

Project Manager: Chris E. Stapp

Project Name: Sump Removal

Project Id: WEA 116-0000

June 20, 1997

XENCO Laboratories

HOUSTON - DALLAS - SAN ANTONIO

APR 1998
Received
Hobbs
OCD

11381 Meadowglen Lane Suite L * Houston, Texas 77082-2647
Phone (281) 589-0692 Fax (281) 589-0695

XENCO Laboratories

11381 Meadowglen Suite L
Houston, Texas 77082-2647
(281) 589-0692 Fax: (281) 589-0695
Houston - Dallas - San Antonio

June 20, 1997

Project Manager: Chris E. Stapp
Nickell Environmental
11246 S. Post Oak #306
Houston, TX 77035

Reference: **XENCO Report No.: 1-71344**
Project Name: Sump Removal
Project ID: WEA 116-0000
Project Address: Odessa, TX WLP

Dear Chris E. Stapp:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with XENCO Chain of Custody Number 1-71344. All results being reported to you apply only to the samples analyzed, properly identified with a Laboratory ID number. This letter documents the official transmission of the contents of the report and validates the information contained within.

All the results for the quality control samples passed thorough examination. Also, all parameters for data reduction and validation checked satisfactorily. In view of this, we are able to release the analytical data for this report within acceptance criteria for accuracy, precision, and completeness.

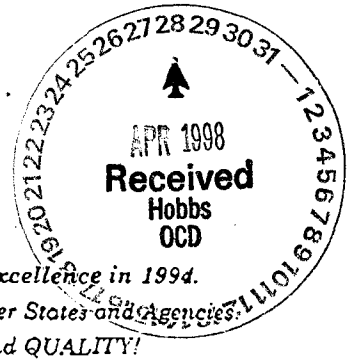
The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 3 years in our archives and after that time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in COC No. 1-71344 will be filed for 60 days, and after that time they will be properly disposed of without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

XENCO Laboratories is accredited by the American Association for Laboratory Accreditation (A2LA) for technical competence in the field of Environmental Testing (Certificate No. 0343-01). In accordance with A2LA's guidelines, XENCO operates a Quality System that meets ISO/IEC Guide 25 requirements and is strictly implemented and enforced through our standard QA/QC procedures.

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Sincerely,

Eddie Kanemoto, Ph.D.
QA/QC Manager



XENCO Laboratories

11381 Meadowglen Suite L Houston, Texas 77082
(713) 589-0692 Fax (713) 589-0695

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST FORM

Page 1 of 1

Lab Batch # 171344

Contractor: Nickell Environmental Phone: (915) 520-4700

Address: 19 Barry Rd Midland TX 79706

Project Name: Sump removal Project Director: Chan Patel

Project Location: Odessa TX WLP Project Manager: Chris Stapp

Sampler Signature: Project No.: WEA116-0000

No. coolers this shipment: Contractor COC #

Carrier: FEDEX Quote #:

Airbill No: 1477017975 P.O. No:

SAMPLE CHARACTERIZATION

Field I.D.	Date	Time	Depth	Soil	Water	Comp	Grab	Container Size	Container Type P, G	Preservative: Ice	Preservative: Other	Sample Description	No. of Containers Total	BTEX (8020/8021)	TPH (418.1)	RCI	TCLP Metals	TCLP VOA	TCLP SVOA	Please Hold	Turn-around: ASAP / 24 hrs / 48 hrs / Standard	Remarks	LAB ID #
S1	6/11	2:15			X			32oz	G	X		Sump	1		X	X	X	X	X				1
S2	6/11	2:20			X			32oz	G	X		Sump	1		X	X	X	X	X				2
																							3
																							4
																							5
																							6
																							7
																							8
																							9
																							10

Waste Oil

PPT No: Tank No:

Dial Diesel Kerosene Unknown

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
	6/11/97	2:15pm			
			Received For Laboratory by:	6-12-97	10:00

Remarks

Pink (Contractor) Yellow & White (Lab)

XENCO Laboratories

ANALYTICAL CHAIN OF CUSTODY REPORT
CHRONOLOGY OF SAMPLES

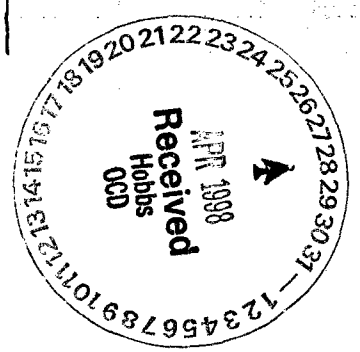
Nickell Environmental

Project ID: WEA 116-0000
Project Manager: Chris E. Stapp
Project Location: Odessa, TX WLP

Project Name: Sump Removal

XENCO COC#: 1-71344
Date Received in Lab: Jun 12, 1997 10:00 by RT
XENCO contact : Scott Sample/Edward Yonemoto

	Field ID	Lab. ID	Method Name	Method ID	Units	Turn Around	Date and Time: Sample Collected	Addition Requested	Extraction	Analysis
1	S1 Sump	171344-001	TPH	EPA 418.1	ppm	Standard	Jun 11, 1997 14:15		Jun 19, 1997 by JS	Jun 19, 1997 14:52 by JS
2			pH	SW846-9040	S.U.	Standard	Jun 11, 1997 14:15		Jun 12, 1997 by CY	Jun 12, 1997 16:20 by CY
3			Ignit/F.P.	SW-846 1010	deg. F	Standard	Jun 11, 1997 14:15		Jun 13, 1997 by CG	Jun 13, 1997 10:40 by CG
4			Cyanide RCI	SW846 7.3.3	mg/L	Standard	Jun 11, 1997 14:15		Jun 14, 1997 by CG	Jun 14, 1997 13:05 by CG
5			Sulfide RCI	SW846 7.3.4	mg/L	Standard	Jun 11, 1997 14:15		Jun 14, 1997 by CG	Jun 14, 1997 12:00 by CG
6			TCLP Metals	SW846-1311/60	mg/L	Standard	Jun 11, 1997 14:15		Jun 12, 1997 by JS	Jun 13, 1997 15:58 by SA
7			TCLP Mercury	EPA 1311/7470	mg/L	Standard	Jun 11, 1997 14:15		Jun 12, 1997 by JS	Jun 13, 1997 13:10 by EZ
8			TCLP Vol.	EPA 1311/8260	mg/L	Standard	Jun 11, 1997 14:15		Jun 19, 1997 by CE	Jun 19, 1997 15:44 by CE
9			TCLP S.V.	EPA 1311/8270	mg/L	Standard	Jun 11, 1997 14:15		Jun 17, 1997 by CY	Jun 17, 1997 16:30 by LC
10	S2 Sump	171344-002	TPH	EPA 418.1	ppm	Standard	Jun 11, 1997 14:20		Jun 19, 1997 by JS	Jun 19, 1997 14:54 by JS
11			pH	SW846-9040	S.U.	Standard	Jun 11, 1997 14:20		Jun 12, 1997 by CY	Jun 12, 1997 16:25 by CY
12			Ignit/F.P.	SW-846 1010	deg. F	Standard	Jun 11, 1997 14:20		Jun 13, 1997 by CG	Jun 13, 1997 10:50 by CG
13			Cyanide RCI	SW846 7.3.3	mg/L	Standard	Jun 11, 1997 14:20		Jun 14, 1997 by CG	Jun 14, 1997 13:10 by CG
14			Sulfide RCI	SW846 7.3.4	mg/L	Standard	Jun 11, 1997 14:20		Jun 14, 1997 by CG	Jun 14, 1997 12:05 by CG
15			TCLP Metals	SW846-1311/60	mg/L	Standard	Jun 11, 1997 14:20		Jun 12, 1997 by JS	Jun 13, 1997 16:05 by SA
16			TCLP Mercury	EPA 1311/7470	mg/L	Standard	Jun 11, 1997 14:20		Jun 12, 1997 by JS	Jun 13, 1997 13:11 by EZ
17			TCLP Vol.	EPA 1311/8260	mg/L	Standard	Jun 11, 1997 14:20		Jun 19, 1997 by CE	Jun 19, 1997 16:23 by CE
18			TCLP S.V.	EPA 1311/8270	mg/L	Standard	Jun 11, 1997 14:20		Jun 17, 1997 by CY	Jun 17, 1997 17:16 by LC



XENCO Laboratories

CERTIFICATE OF ANALYSIS SUMMARY 1-71344

Nickell Environmental

Project Name: Sump Removal

Project ID: WEA 113-0000
Project Manager: Chris E. Stapp
Project Location: Odessa, TX WLP

Date Received in Lab: Jun 12, 1997 10:00 by RT
Date Report Faxed: Jun 20, 1997
XENCO contact: Scott Sample/Edward Yonemoto

Analysis Requested	*Lab ID:*	171344-001	171344-002				
	Field ID:	S1	S2				
	Depth:						
Ignit./F.P. Analyzed by EPA 1010		Date Analyzed - Analytical Results					**deg. F**
		Jun 13, 1997	Jun 13, 1997				
Ignitability, Pensky-Martens		> 180	> 180				
TCLP Metals Analyzed by EPA1311/6010		Date Analyzed - Analytical Results					**ppm (mg/L - mg/Kg)**
		Jun 13, 1997	Jun 13, 1997				
Arsenic		< 0.6	< 0.6				
Barium		< 1.1	< 1.1				
Cadmium		< 0.11	< 0.11				
Chromium		< 0.6	< 0.6				
Lead		< 0.6	< 0.6				
Silver		< 0.09	< 0.09				
Selenium		< 0.4	< 0.4				
TCLP Mercury Analyzed by EPA 7470		Date Analyzed - Analytical Results					**ppm (mg/L - mg/Kg)**
		Jun 13, 1997	Jun 13, 1997				
Mercury		< 0.020	< 0.020				
Cyanide RCI Analyzed by SW846 7.3.3		Date Analyzed - Analytical Results					**ppm (mg/L - mg/Kg)**
		Jun 14, 1997	Jun 14, 1997				
Cyanide		< 0.5	< 0.5				
Sulfide RCI Analyzed by SW846 7.3.4		Date Analyzed - Analytical Results					**ppm (mg/L - mg/Kg)**
		Jun 14, 1997	Jun 14, 1997				
Sulfide		< 0.5	< 0.5				
pH Analyzed by EPA 9040		Date Analyzed - Analytical Results					**S.U.**
		Jun 12, 1997	Jun 12, 1997				
pH, Electrometric		8.10	8.00				
TCLP S.V. Analyzed by EPA 8270		Date Analyzed - Analytical Results					**ppm (mg/L - mg/Kg)**
		Jun 17, 1997	Jun 17, 1997				

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This report summary, and the entire report it represents, has been made for the exclusive and confidential use of Nickell Environmental.
The interpretations and results expressed through this analytical report represent the best judgment of XENCO Laboratories. Xenco Laboratories, however, assumes no responsibility and makes no warranty to the end use of the data hereby presented.

Edward H. Yonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

CERTIFICATE OF ANALYSIS SUMMARY 1-71344

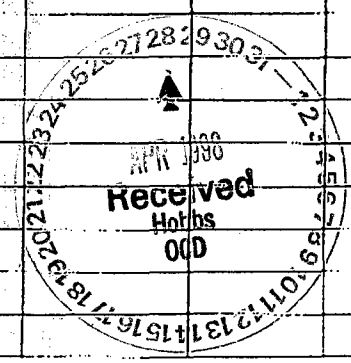
Nickell Environmental

Project Name: Sump Removal

Project ID: WEA 116-0000
Project Manager: Chris E. Stapp
Project Location: Odessa, TX WLP

Date Received in Lab: Jun 12, 1997 10:00 by RT
Date Report Faxed: Jun 20, 1997
XENCO contact: Scott Sample/Edward Yonemoto

Analysis Requested	Lab ID: / Field ID: / Depth:	171344-001 S1	171344-002 S2
1,4-Dichlorobenzene		< 1.00	< 1.00
2,4-Dinitrotoluene		< 0.10	< 0.10
Hexachlorobenzene		< 0.08	< 0.08
Hexachlorobutadiene		< 0.40	< 0.40
Hexachloroethane		< 1.00	< 1.00
2-Methylphenol		< 10.00	< 10.00
3-Methylphenol		< 10.00	< 10.00
4-Methylphenol		< 10.00	< 10.00
Nitrobenzene		< 1.00	< 1.00
Pentachlorophenol		< 10.00	< 10.00
Pyridine		< 1.00	< 1.00
2,4,5-Trichlorophenol		< 10.00	< 10.00
2,4,6-Trichlorophenol		< 1.00	< 1.00
TCLP Vol. Analyzed by EPA1311/8260		Date Analyzed - Analytical Results	**ppm (mg/L - mg/Kg)**
		Jun 19, 1997	Jun 19, 1997
Benzene		< 0.1	< 0.1
2-Butanone		< 8.0	< 8.0
Carbon Tetrachloride		< 0.1	< 0.1
Chloroform		< 0.5	< 0.5
1,2-Dichloroethane		< 0.1	< 0.1
1,1-Dichloroethene		< 0.1	< 0.1
Tetrachloroethene		< 0.1	< 0.1
Trichloroethene		< 0.1	< 0.1
Vinyl chloride		< 0.05	< 0.05
Chlorobenzene		< 4.0	< 4.0



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The interpretations and results expressed through this analytical report represent the best judgment of XENCO Laboratories. Xenco Laboratories, however, assumes no responsibility and makes no warranty to the end use of the data hereby presented.

Edward H. Yonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

CERTIFICATE OF ANALYSIS SUMMARY 1-71344

Nickell Environmental

Project Name: Sump Removal

Project ID: WEA 116-0000
Project Manager: Chris E. Stapp
Project Location: Odessa, TX WLP

Date Received in Lab: Jun 12, 1997 10:00 by RT
Date Report Faxed: Jun 20, 1997
XENCO contact: Scott Sample/Edward Yonemoto

Analysis Requested	*Lab ID:*	171344-001	171344-002				
	Field ID:	S1	S2				
	Depth:						
TPH Analyzed by EPA 418.1		Date Analyzed - Analytical Results ppm (mg/L - mg/Kg)					
		Jun 19, 1997	Jun 19, 1997				
Total Petroleum Hydrocarbons		11300	18400				

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Edward H. Yonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

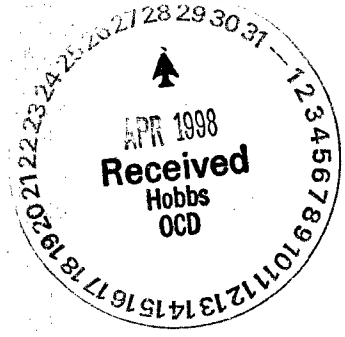
Certificate Of Quality Control for Batch 17A11A42

SW- 846 1010 Ignitability, Pensky- Martens

Date Validated: Jun 16, 1997 16:45
Date Analyzed: Jun 13, 1997 10:20
QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: CG
Matrix: Solid

	MATRIX DUPLICATE ANALYSIS					
Q.C. Sample ID 171332- 001	[A] Sample Result	[B] Duplicate Result	[C] Method Detection Limit	[D] QC LIMITS Relative Difference	[E] LIMITS Relative Difference	[F] Qualifier
Parameter	deg. F	deg. F	deg. F	%	%	
Ignitability, Pensky-Martens	>180	>180	75-180	0.0	15.0	



Relative Difference [D] = 200*(B-A)/(B+A)
N.C. = Not calculated, data below detection limit
N.D. = Below detection limit
All results are based on MDL and validated for QC purposes only

Edward H. Yonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

Certificate Of Quality Control for Batch : 17A18C40

SW846- 1311/6010 TCLP Metals

Date Validated: Jun 14, 1997 09:30
Date Analyzed: Jun 13, 1997 14:34
QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: SA
Matrix: Solid

BLANK SPIKE ANALYSIS

Parameter	[A] Blank Result mg/L	[B] Blank Spike Result mg/L	[C] Blank Spike Amount mg/L	[D] Method Detection Limit mg/L	[E] QC Blank Spike Recovery %	[F] LIMITS Recovery Range %	[G] Qualifier
Arsenic	< 0.22	1.97	2.22	0.22	88.7	65-135	
Barium	< 0.11	1.22	1.11	0.11	109.9	65-135	
Cadmium	< 0.056	0.387	0.444	0.056	87.2	65-135	
Chromium	< 0.22	0.94	1.11	0.22	84.7	65-135	
Lead	< 0.22	1.92	2.22	0.22	86.5	65-135	
Selenium	< 0.22	2.15	2.22	0.22	96.8	65-135	
Silver	< 0.089	0.654	0.888	0.089	73.6	65-135	

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Blank Spike Recovery [E] = 100*(B-A)/(C)
N.C. = Not calculated, data below detection limit
N.D. = Below detection limit
All results are based on MDL and validated for QC purposes only

Edward H. Yonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

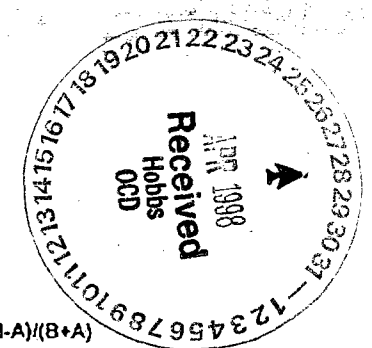
Certificate Of Quality Control for Batch : 17A18C40

SW846- 1311/6010 TCLP Metals

Date Validated: Jun 14, 1997 09:30
Date Analyzed: Jun 13, 1997 15:02
QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: SA
Matrix: Solid

	MATRIX DUPLICATE ANALYSIS					MATRIX SPIKE ANALYSIS				
Q.C. Sample ID 171354- 009	[A] Sample Result	[B] Duplicate Result	[C] Method Detection Limit	[D] QC LIMITS Relative Difference	[E] LIMITS Relative Difference	[F] Matrix Spike Result	[G] Matrix Spike Amount	[H] QC Matrix Spike Recovery	[I] LIMITS Recovery Range	[G] Qualifier
Parameter	mg/L	mg/L	mg/L	%	%	mg/L	mg/L	%	%	
Arsenic	< 0.22	< 0.22	0.22	N.C	25.0	2.1	2.2	93.2	65-135	
Barium	1.79	1.82	0.11	1.7	25.0	2.8	1.1	86.5	65-135	
Cadmium	< 0.056	< 0.056	0.056	N.C	25.0	0.38	0.44	86.5	65-135	
Chromium	< 0.22	< 0.22	0.22	N.C	25.0	1.0	1.1	85.6	65-135	
Lead	< 0.22	< 0.22	0.22	N.C	25.0	2.0	2.2	89.2	65-135	
Selenium	< 0.22	< 0.22	0.22	N.C	25.0	2.2	2.2	100.8	65-135	
Silver	< 0.089	< 0.089	0.089	N.C	25.0	0.73	0.89	82.4	65-135	



Relative Difference [D] = 200*(B-A)/(B+A)
Matrix Spike Recovery [H] = 100*(F-A)/[G]
N.C. = Not calculated, data below detection limit
N.D. = Below detection limit
All results are based on MDL and validated for QC purposes only

Edward H. Yonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

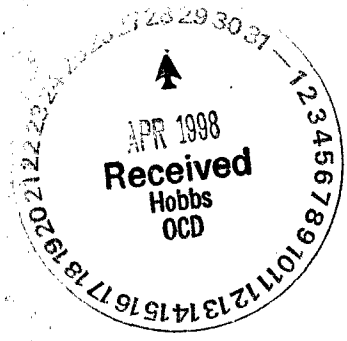
Certificate Of Quality Control for Batch : 17A05B55

EPA 1311/7470 TCLP Mercury

Date Validated: Jun 14, 1997 09:45
Date Analyzed: Jun 13, 1997 12:59
QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: EZ
Matrix: Solid

	BLANK SPIKE ANALYSIS						
Parameter	[A] Blank Result mg/L	[B] Blank Spike Result mg/L	[C] Blank Spike Amount mg/L	[D] Method Detection Limit mg/L	[E] QC LIMITS Blank Spike Recovery %	[F] LIMITS Recovery Range %	[G] Qualifier
Mercury	< 0.0010	0.0018	0.0025	0.0010	72.0	65-135	



Blank Spike Recovery [E] = 100*(B-A)/(C)
N.C. = Not calculated, data below detection limit
N.D. = Below detection limit
All results are based on MDL and validated for QC purposes only

Edward H. Yonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

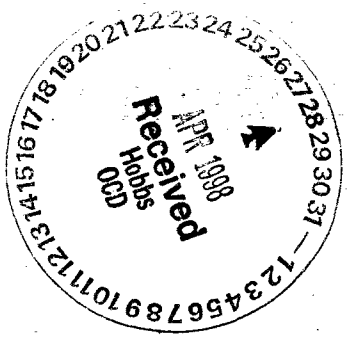
Certificate Of Quality Control for Batch : 17A05B55

EPA 1311/7470 TCLP Mercury

Date Validated: Jun 14, 1997 09:45
Date Analyzed: Jun 13, 1997 13:01
QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: EZ
Matrix: Solid

	MATRIX DUPLICATE ANALYSIS					MATRIX SPIKE ANALYSIS				
Q.C. Sample ID 171354- 013	[A] Sample Result	[B] Duplicate Result	[C] Method Detection Limit	[D] QC Relative Difference	[E] LIMITS Relative Difference	[F] Matrix Spike Result	[G] Matrix Spike Amount	[H] QC Matrix Spike Recovery	[I] LIMITS Recovery Range	[G] Qualifier
Parameter	mg/L	mg/L	mg/L	%	%	mg/L	mg/L	%	%	
Mercury	< 0.0010	< 0.0010	0.0010	N.C	25.0	0.0025	0.0025	100.0	65-135	



Relative Difference [D] = 200*(B-A)/(B+A)
Matrix Spike Recovery [H] = 100*(F-A)/[G]
N.C. = Not calculated, data below detection limit
N.D. = Below detection limit
All results are based on MDL and validated for QC purposes only

Edward H. Yonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

Certificate Of Quality Control for Batch 17A12B11

SW846 7.3.3 Reactive Cyanide

Date Validated: Jun 16, 1997 16:30
Date Analyzed: Jun 14, 1997 12:40
QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: CG
Matrix: Liquid

BLANK SPIKE ANALYSIS

Parameter	[A] Blank Result mg/L	[B] Blank Spike Result mg/L	[C] Blank Spike Amount mg/L	[D] Method Detection Limit mg/L	[E] QC Blank Spike Recovery %	[F] LIMITS Recovery Range %	[G] Qualifier
Cyanide	< 0.05	0.09	0.10	0.05	94.7	70-125	

Blank Spike Recovery [E] = 100*(B-A)/C)
N.C. = Not calculated; data below detection limit
N.D. = Below detection limit
All results are based on MDL and validated for QC purposes only

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Edward H. Yonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

Certificate Of Quality Control for Batch : 17A12B10

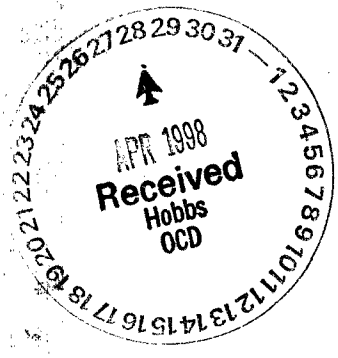
SW846 7.3.4 Reactive Sulfide

Date Validated: Jun 16, 1997 16:35
Date Analyzed: Jun 14, 1997 11:40
QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: CG
Matrix: Liquid

BLANK SPIKE ANALYSIS

Parameter	[A] Blank Result mg/L	[B] Blank Spike Result mg/L	[C] Blank Spike Amount mg/L	[D] Method Detection Limit mg/L	[E] QC Blank Spike Recovery %	[F] LIMITS Recovery Range %	[G] Qualifier
Sulfide	< 0.50	6.48	6.80	0.50	95.3	70-125	



Blank Spike Recovery [E] = 100*(B-A)/(C)
N.C. = Not calculated, data below detection limit
N.D. = Below detection limit
All results are based on MDL and validated for QC purposes only

Edward H. Yonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

Certificate Of Quality Control for Batch 17A13A82

EPA 150.1 pH, Electrometric

Date Validated: Jun 12, 1997 17:55
Date Analyzed: Jun 12, 1997 15:50
QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: CY
Matrix: Liquid

	MATRIX DUPLICATE ANALYSIS					
Q.C. Sample ID 171341- 001	[A] Sample Result	[B] Duplicate Result	[C] Method Detection Limit	[D] QC Limits Relative Difference	[E] Limits Relative Difference	[F] Qualifier
Parameter	S.U.	S.U.	S.U.	%	%	
pH, Electrometric	7.196	7.215	0 - 14	0.3	3.0	

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Relative Difference [D] = 200*(B-A)/(B+A)
N.C. = Not calculated, data below detection limit
N.D. = Below detection limit
All results are based on MDL and validated for QC purposes only

Edward H. Yonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

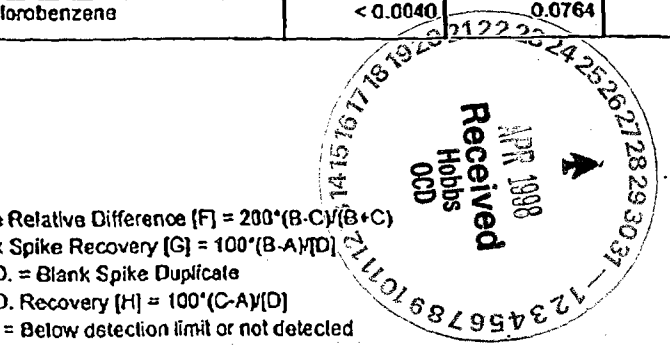
Certificate Of Quality Control for Batch # 17A34C20

EPA 1311/8270 TCLP Semi-volatiles

Date Validated: Jun 18, 1997 14:01
Analyst: LC
Date Analyzed: Jun 17, 1997 14:59
Matrix: Liquid
QA/QC Manager: Edward H. Yonemoto, Ph.D.

BLANK SPIKE / BLANK SPIKE DUPLICATE AND RECOVERY

Parameter	[A] Blank Result mg/L	[B] Blank Spike Result mg/L	[C] Blank Spike Duplicate Result mg/L	[D] Blank Spike Amount mg/L	[E] Method Detection Limit mg/L	Blank Limit Relative Difference %	[F] QC Spike Relative Difference %	[G] QC Blank Spike Recovery %	[H] QC B.S.D. Recovery %	[I] Blank Spike Recovery Range %	[J] Qualifie
Acenaphthene	< 0.0020	0.0822	0.0886	0.1000	0.0020	31.0	7.5	82.2	88.6	46-118	
4-Chloro-3-Methylphenol	< 0.0010	0.0694	0.0630	0.1000	0.0010	42.0	9.7	69.4	63.0	23-97	
2-Chlorophenol	< 0.0040	0.0868	0.0900	0.1000	0.0040	40.0	3.6	86.8	90.0	27-123	
1,4-Dichlorobenzene	< 0.0040	0.0834	0.0960	0.1000	0.0040	28.0	14.0	83.4	96.0	36-97	
2,4-Dinitrotoluene	< 0.0010	0.0878	0.0946	0.1000	0.0010	38.0	7.5	87.8	94.6	24-96	
N-Nitroso-di-n-propylamine	< 0.0080	0.1010	0.1156	0.1000	0.0080	38.0	13.5	101.0	115.6	41-116	
4-Nitrophenol	< 0.0080	0.0372	0.0336	0.1000	0.0080	50.0	10.2	37.2	33.6	10-80	
Pentachlorophenol	< 0.0010	0.0664	0.0674	0.1000	0.0010	50.0	1.5	66.4	67.4	9-103	
Phenol	< 0.0040	0.0518	0.0466	0.1000	0.0040	42.0	10.6	51.8	46.6	12-89	
Pyrene	< 0.0040	0.0946	0.1070	0.1000	0.0040	31.0	12.3	94.6	107.0	26-127	
1,2,4-Trichlorobenzene	< 0.0040	0.0764	0.0842	0.1000	0.0040	28.0	9.7	76.4	84.2	39-98	



Spike Relative Difference [F] = 200*(B-C)/(B+C)
Blank Spike Recovery [G] = 100*(B-A)/[D]
B.S.D. = Blank Spike Duplicate
B.S.D. Recovery [H] = 100*(C-A)/[D]
N.D. = Below detection limit or not detected
All results are based on MDL and validated for QC purposes

Edward H. Yonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

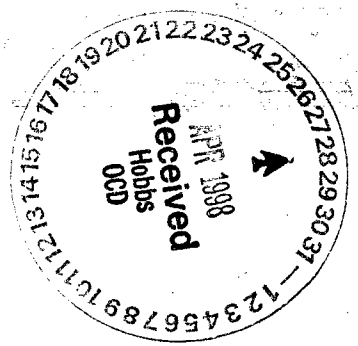
Certificate Of Quality Control for Batch : 17A01C45

SW846- 8260 Volatile Organic Analysis

Date Validated: Jun 20, 1997 12:45
Analyst: CE
Date Analyzed: Jun 19, 1997 17:42
Matrix: Liquid
QA/QC Manager: Edward H. Yonemoto, Ph.D.

MATRIX SPIKE / MATRIX SPIKE DUPLICATE AND RECOVERY

Q.C. Sample ID 171402- 004 / Parameter	[A] Sample Result mg/L	[B] Matrix Spike Result mg/L	[C] Matrix Spike Duplicate Result mg/L	[D] Matrix Spike Amount mg/L	[E] Method Detection Limit mg/L	Matrix Limit Relative Difference %	[F] QC Spike Relative Difference %	[G] QC Matrix Spike Recovery %	[H] QC M.S.D. Recovery %	[I] Matrix Spike Recovery Range %	[J] Qualifi
Benzene	< 0.0010	0.0492	0.0492	0.0500	0.0010	11.0	0.0	98.4	98.4	76-127	
Chlorobenzene	< 0.0010	0.0492	0.0496	0.0500	0.0010	13.0	0.8	98.4	99.2	75-130	
1,1-Dichloroethene	< 0.0040	0.0421	0.0422	0.0500	0.0040	14.0	0.2	84.2	84.4	61-145	
Toluene	< 0.0010	0.0494	0.0479	0.0500	0.0010	13.0	3.1	98.8	95.8	76-125	
Trichloroethene	< 0.0030	0.0475	0.0480	0.0500	0.0030	14.0	1.0	95.0	96.0	71-120	



Spike Relative Difference [F] = 200*(B-C)/(B+C)
Matrix Spike Recovery [G] = 100*(B-A)/[D]
M.S.D. = Matrix Spike Duplicate
M.S.D. Recovery [H] = 100*(C-A)/[D]
N.D. = Below detection limit or not detected
All results are based on MDL and validated for QC purposes

Edward H. Yonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

Certificate Of Quality Control for Batch : 17A07E24

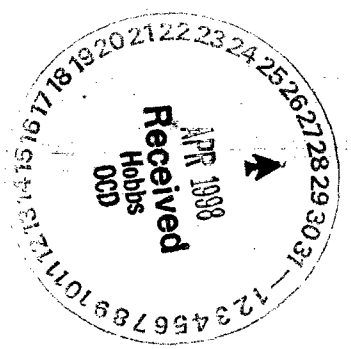
EPA 418.1 Total Petroleum Hydrocarbons

Date Validated: Jun 19, 1997 16:00
Date Analyzed: Jun 19, 1997 14:48
QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: JS
Matrix: Liquid

BLANK SPIKE / BLANK SPIKE DUPLICATE AND RECOVERY

Parameter	[A] Blank Result ppm	[B] Blank Spike Result ppm	[C] Blank Spike Duplicate Result ppm	[D] Blank Spike Amount ppm	[E] Method Detection Limit ppm	Blank Limit Relative Difference %	[F] QC Spike Relative Difference %	[G] QC Blank Spike Recovery %	[H] QC B.S.D. Recovery %	[I] Blank Spike Recovery Range %	[J] Qualifi
Total Petroleum Hydrocarbons	< 0.51	4.34	4.40	4.71	0.51	25.0	1.4	92.1	93.4	70-125	



Spike Relative Difference [F] = 200*(B-C)/(B+C)
Blank Spike Recovery [G] = 100*(B-A)/[D]
B.S.D. = Blank Spike Duplicate
B.S.D. Recovery [H] = 100*(C-A)/[D]
N.D. = Below detection limit or not detected
All results are based on MDL and validated for QC purposes

Edward H. Yonemoto, Ph.D.
QA/QC Manager

75327 Weatherford U.S., Inc.

Solid Waste Registration Number: 75327 EPA Id: TXD988025755

Company Name: Weatherford U.S., Inc.
Site Name: Odessa-Tool
Site Location: 8870 N Loop 338 N, Odessa, TX
Contact: ~~Johnson, Mike~~ ?

Region: 7
County: 68 Ector
Title: Location Manager

Initial Registration Date: 05/06/1991
Last Amendment Date: 09/18/1995
Last Date NOR Computer update: 06/19/1996
Phone: 915-550-9297

Mailing Address: P. O. Drawer-112
Odessa, TX 79760-0112

Site Street Address: 8870 N Loop 338 N
Odessa, TX 79764-

Registration Status: Active
Registration Type: Generator
Generator Type: Non-industrial and/or municipal

Reporting Method: STEERS

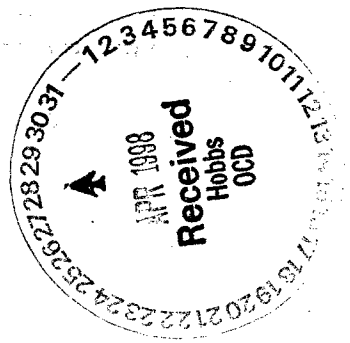
Hazardous Waste Generation Status: Small Quantity Generator

Primary SIC Code: 1389 Oil & Gas Field Services, Not Elsewhere Found
Handler Status:

Operator Information
Name:
Phone:
Address:

Owner Information
Name: Weatherford U.S., Inc.
Phone:
Address: P.O. Box 27608
Suite 1C00
Houston, TX, 77227-7608

As of 09/18/1995 - the next unassigned sequence number for WASTES is 6032 and the next unassigned sequence number for UNITS is 001.



75327 Weatherford U.S., Inc.

**** WASTE INFORMATION ****

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete
****** Active Wastes ******						
00103071 1		Active	01/26/94	Off		No

Description from Generator: Pipe scale, scraping of pipe used in the oil and gas industry/ ongoing process.
Form Code: 307 Metal scale, filings, or scrap
Current Management Units: None
* Origin Codes: 1 Onsite-process/service 3 From non-haz waste mgmt

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00116951 1 Active 01/26/94 Off No

Description from Generator: Sump material /tools are steam cleaned and washed to remove lubricant, dirt, paint, scale, and corrosion products/August 1993.
Form Code: 695 Petro contam sldg not still bottoms & oily sludges
Current Management Units: None
* Origin Codes: 1 Onsite-process/service 3 From non-haz waste mgmt

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60012031H H Active 08/05/94 Off No No

Description from Generator: Spent solvents (mineral spirits/varsol). Oil field related equipment, tools and parts are rinsed in solvent to removed grease and debris during servicing. Waste is mixture of spent petroleum solvent with grease and silt debris parts washing.
Form Code: 203 Non-halogenated solvent
EPA Hazardous Waste Numbers: D001 D006 D008 D018 D035 D039 D040
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: A19 Other cleaning and degreasing
* Measurement Points: 1 Before mixing
* SIC Codes: 1389 Oil & Gas Field Services, Not Elsewhere Found 3533 Oil Field Machinery & Equipment
7359 Equipment Rental And Leasing, NEC
Company's Internal Code(s): Spent Solvent - Parts Wash

60022021H H Active 08/05/94 Off No

Description from Generator: Spent immersion cleaner/cold cleaner. Oil field related equipment, tools, parts, and pipe are cleaned in immersion cleaner to remove grease and debris during servicing. Waste is a mixture of heavy aromatic Naptha, oil, Monoethanolamine, grease and silt debris.
Form Code: 203 Non-halogenated solvent
EPA Hazardous Waste Numbers: D006 D008 D018 D021 D027 D035 D039 D040
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: A19 Other cleaning and degreasing
* Measurement Points: 1 Before mixing
* SIC Codes: 1389 Oil & Gas Field Services, Not Elsewhere Found 3533 Oil Field Machinery & Equipment
7359 Equipment Rental And Leasing, NEC
Company's Internal Code(s): Immersion Cleaner

60032051 1 Active 08/05/94 Off No

Description from Generator: Oil-water emulsion and mixture from oil field equipment servicing. Oil field hydraulic equipment, pipe, and tools are cleaned and reconditioned. Oil, grease, and wash water collect in sump. Waste is mixture of oil and water. Non-hazardous.
Form Code: 205 Oil-water emulsion or mixture
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

Received
JAN 1998
Hobbs
OCD

75327 Weatherford U.S., Inc.

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete

****** Active Wastes ******

Company's Internal Code(s): Sump Waste - Liquid

60045012 2 Active 08/05/94 Off No

Description from Generator: Class 2 paper, lumber, plastic, paper packing material, plastic packing material, styrofoam, glass, aluminum foil. Does not include metal parts, floor sweepings or scrap metals. Generating process is general non hazardous maintenance.

Form Code: 901 Plant production refuse

Current Management Units: None

* Origin Codes: 1 Onsite-process/service

Company's Internal Code(s): Plant Refuse

60059032 2 Active 08/05/94 Off No

Description from Generator: Class 2 paper, cardboard, linings, wrappings, paper, wood or plastic wrappings, food wastes, glass, aluminum foil, aluminum cans, plastics, styrofoam, food packings, empty shipping cartons, binders. Process generating is from general office operations.

Form Code: 903 Plant Office refuse

Current Management Units: None

* Origin Codes: 1 Onsite-process/service

Company's Internal Code(s): Office Refuse

60063101 1 Active 08/05/94 Off No

Description from Generator: Used oil filters from vehicle and equipment maintenance. Non-hazardous.

Form Code: 310 Spent solid filters or adsorbents (inorganic)

Current Management Units: None

* Origin Codes: 1 Onsite-process/service

60072061 1 Active 08/05/94 Off No

Description from Generator: Used motor oil and used hydraulic oil from vehicle and equipment maintenance. to be sent to oil recycler. Non-hazardous.

Form Code: 206 Waste oil

Current Management Units: None

* Origin Codes: 1 Onsite-process/service

60083101 1 Active 08/05/94 Off No

Description from Generator: Used paint filters from spray paint application equipment used in painting oil field tools and equipment. Filters have been dried. There are no liquids present. Non-hazardous.

Form Code: 310 Spent solid filters or adsorbents (inorganic)

Current Management Units: None

* Origin Codes: 1 Onsite-process/service

Received
Hobbs
OCD
MAR 1998

75327 Weatherford U.S., Inc.

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete
****** Active Wastes ******						

60092091 H Active 08/05/94 Off No
Description from Generator: Paint waste, oil based, liquid containing paint thinner of mineral spirits/Varsol. Generating process is from painting oil field tools and equipment, general maintenance. Ignitable.
Form Code: 209 Organic paint, ink, lacquer, or varnish
EPA Hazardous Waste Numbers: D001
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: A21 Painting
* Measurement Points: 1 Before mixing
* SIC Codes: 1389 Oil & Gas Field Services, Not Elsewhere Found 3533 Oil Field Machinery & Equipment
7359 Equipment Rental And Leasing, NEC

60102091 1 Active 08/05/94 Off No
Description from Generator: Waste paint, water based. Process generating is from paint parts, tools and equipment - general maintenance.
Form Code: 209 Organic paint, ink, lacquer, or varnish
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

60114091 1 Active 08/05/94 Off No
Description from Generator: Paint waste solids from clean up of paint booth overspray, floor scrappings and wood with overspray. Generating process is from painting oil field tools and equipment.
Form Code: 409 Other non-halogenated organic solids
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

60122111 H Active 08/05/94 Off No
Description from Generator: Spent waste paint thinner used in thinning paint, cleaning paint equipment and general maintenance for paint preparation activities of oil field tools and equiment. Contains mineral spirits/Varsol/VM&P Naptha. Ignitable.
Form Code: 211 Paint thinner or petroleum distillates
EPA Hazardous Waste Numbers: D001
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: A21 Painting A19 Other cleaning and degreasing
* Measurement Points: 1 Before mixing
* SIC Codes: 1389 Oil & Gas Field Services, Not Elsewhere Found 3533 Oil Field Machinery & Equipment
7359 Equipment Rental And Leasing, NEC

60133191 1 Active 08/05/94 Off No
Description from Generator: Pipe scale solids, including rust, drilling mud and dry oil. Generated during the cleaning and reconditioning of oil field drilling pipe. Non-hazardous.
Form Code: 319 Other waste inorganic solids
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

Received
APR 1998
Hobbs
OCD

75327 Weatherford U.S., Inc.

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete

****** Active Wastes ******

60143091 H Active 08/05/94 Off No

Description from Generator: Used lead batteries, or battery parts, casings or cores. Process generating is "out of service" batteries from facility vehicles and equipment maintenance. To be sent to battery recycler. Hazardous.

Form Code: 309 Batteries or battery parts, casings, cores

EPA Hazardous Waste Numbers: D002 D008

Current Management Units: None

* Origin Codes: 1 Onsite-process/service

* Source Codes: A55 Filter/Battery replacement

* Measurement Points: 1 Before mixing

* SIC Codes: 1389 Oil & Gas Field Services, Not Elsewhere Found 3533 Oil Field Machinery & Equipment
7349 Building Maintenance Services, NEC

60151101 1 Active 08/05/94 Off No

Description from Generator: Oil absorbants, rags and pads from general clean up and maintenance activities. For cleaning minor releases of oil from maintenance and repair of equipment. Waste is generally a mixture of non-biodegradable absorbent granules, rags & pads impregnated with oil. Non-hazardous.

Form Code: 310 Spent solid filters or absorbents (inorganic)

Current Management Units: None

* Origin Codes: 1 Onsite-process/service

60163081 1 Active 08/05/94 Off No

Description from Generator: Empty metal drums and empty metal containers from products purchased. Rendered empty after use of product. Non-hazardous.

Form Code: 308 Empty or crushed metal drums or containers

Current Management Units: None

* Origin Codes: 1 Onsite-process/service

60174061 1 Active 08/05/94 Off No

Description from Generator: Empty fiber or plastic containers from products purchased. Rendered empty after use of product. Non-hazardous.

Form Code: 406 Empty fiber or plastic containers

Current Management Units: None

* Origin Codes: 1 Onsite-process/service

60182961 1 Active 08/05/94 Off No

Description from Generator: Waste glycol based antifreeze/coolant. Removed from facility vehicles and equipment during service and repair. Non-hazardous.

Form Code: 296 Ethylene glycol based antifreeze

Current Management Units: None

* Origin Codes: 1 Onsite-process/service

60196951 1 Active 09/18/95 Off No

Description from Generator: Petroleum contaminated sludge from sump. Tools are steam cleaned & washed to remove lubricant, dirt, paint, scale & corrosion. Liquids are removed & sludge remains.

Form Code: 595 Petro contam sldg not still bottoms & oily sludges

Current Management Units: None

* Origin Codes: 1 Onsite-process/service

Company's Internal Code(s): Sump sludge

Received
Hobbs
OCD
APR 1998

75327 Weatherford U.S., Inc.

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	THRCC Audit Complete

****** Active Wastes ******

60203071 1 Active 08/05/94 Off No
Description from Generator: Scrap metal. Generated during the manufacture and servicing of oil field tools and equipment. Miscellaneous metal pieces and parts which are no longer useable are scrapped and sent to metal recycler. Non-hazardous.
Form Code: 307 Metal scale, filings, or scrap
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Scrap metal

60219022 2 Active 08/05/94 Off No
Description from Generator: Supplemental plant refuse - primarily solid floor sweepings from plant production operations. Non-hazardous.
Form Code: 902 Supplemental plant production refuse
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

60222191 1 Active 08/05/94 Off No
Description from Generator: Oil based machine coolant/water soluable. Liquid. Spent coolant from machining process of tooling, cutting and grooving. Non-hazardous.
Form Code: 219 Other organic liquids
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

60234891 1 Active 09/18/95 Off No
Description from Generator: Pipe coating. Coating is applied to oil field drilling pipe to inhibit corrosion. Dried/solidified accumulations of drippings from application process are collected for disposal.
Form Code: 489 Petroleum contaminated solids
Current Management Units: None
* Origin Codes: 1 Onsite-process/service

60242058 H Active 08/05/94 Off No
Description from Generator: Paint waste, liquids, containing toluene and/or xylene. Spent paint from painting tools, parts and equipment. Hazardous
Form Code: 209 Organic paint, ink, lacquer, or varnish
EPA Hazardous Waste Numbers: D001 F003 F005
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: A21 Painting
* Measurement Points: 1 Before mixing
* SIC Codes: 1389 Oil & Gas Field Services, Not Elsewhere Found 3533 Oil Field Machinery & Equipment
7359 Equipment Rental And Leasing, NEC

Received
Hobbs
OCD
FEB 1998

75327 Weatherford U.S., Inc.

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete

****** Active Wastes ******

60253101 H Active 08/05/94 Off No

Description from Generator: Paint waste filters. Solid paint filters containing liquids. Not dry. Used paint filters from spray paint equipment used in paint equipment. Paint contains toluene and xylene from thinning process. Hazardous.1

Form Code: 310 Spent solid filters or adsorbents (inorganic)

EPA Hazardous Waste Numbers: D001 F003 F005

Current Management Units: None

* Origin Codes:

* Source Codes: A21 Painting

* Measurement Points: 1 Before mixing

* SIC Codes: 1389 Oil & Gas Field Services, Not Elsewhere Found 3533 Oil Field Machinery & Equipment
7359 Equipment Rental And Leasing, NEC

Company's Internal Code(s): Paint filters/hazardous

60264891 1 Active 08/05/94 Off No

Description from Generator: Petroleum contaminated solids. Non-hazardous. Sand, silt, grit, residual hydraulic oil, grease and paint chips accumulate from cleaning of oil field pipe, parts, and equipment.

Form Code: 489 Petroleum contaminated solids

Current Management Units: None

* Origin Codes: 1 Onsite-process/service

60283191 1 Active 12/28/96 Off No

Description from Generator: Used tires removed from trucks & equipment. Tires are no longer in service & are sent to tire recycler.

Form Code: 319 Other waste inorganic solids

Current Management Units: None

* Origin Codes: 1 Onsite-process/service 3 From non-haz waste mgmt

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60292091 H Active 09/18/95 Off No No

Description from Generator: Waste paint aerosol cans used for painting oil field tools & equipment. Oil field tools & equipment are painted as needed between use. Waste includes paint aerosol cans with residual paint & propellant

Form Code: 209 Organic paint, ink, lacquer, or varnish

EPA Hazardous Waste Numbers: D001 F003 F005

Current Management Units: None

* Origin Codes: 1 Onsite-process/service

* Source Codes: A21 Painting

* Measurement Points: 1 Before mixing

* SIC Codes: 1389 Oil & Gas Field Services, Not Elsewhere Found 3533 Oil Field Machinery & Equipment
7359 Equipment Rental And Leasing, NEC

60304891 1 Active 09/18/95 Off No

Description from Generator: Drilling mud, cement & crude oil solids from cleaning oil field drilling mud circulation pits. Pits are serviced & cleaned at facility between rentals. Wate includes a mixture of solid residual drilling mud, cement, crude oil & paraffin scraped & cleaned from pits.

Form Code: 489 Petroleum contaminated solids

Current Management Units: None

* Origin Codes: 1 Onsite-process/service

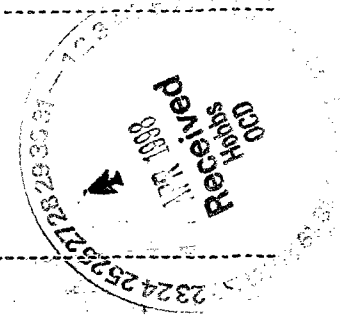
Received
MAR 1998
Hobbs
OCD

75327 Weatherford U.S., Inc.

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TNRCC Audit Complete

****** Active Wastes ******

6031109H H Active 09/18/95 Off No No
Description from Generator: Spent caustic solution used for stripping paint & grease from oil field rental tools during cleaning process. Waste includes mixed solution of water, sodium hydroxide, oil, grease & paint.
Form Code: 109 Spent caustic
EPA Hazardous Waste Numbers: D002 D006 D007 D008
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
* Source Codes: A03 Caustic (Alkali) cleaning
* Measurement Points: 1 Before mixing
* SIC Codes: 1389 Oil & Gas Field Services, Not Elsewhere Found



930001 H Active Off No
Description from Generator: D001 CHARACTERISTIC OF IGNITABILITY
Form Code:
EPA Hazardous Waste Numbers: D018 D039
Current Management Units: None
* Origin Codes:

* The first value is considered the primary value (e.g. primary origin code).
As of 09/18/1995, the next unassigned sequence number for WASTES is 6032.

** No Longer Generated Wastes **

00196951 1 Inactive 09/18/95 HA No No
Description from Generator: Petroleum contaminated sludge from sump. Tools are steam cleaned and washed to remove lubricant, dirt, paint, scale and corrosion. Liquids are removed and this sludge remains.
Form Code: 695 Petro contam sldg not still bottoms & oily sludges
Current Management Units: None
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Sump Sludge

00234691 1 Inactive 09/18/95 HA No No
Description from Generator: Pipe coating. Non hazardous. Pipe coating is applied to oil field drilling pipe to inhibit corrosion. Dried/solidified accumulations of the drippings from the application process are collected for disposal.
Form Code: 489 Petroleum contaminated solids
Current Management Units: None.
* Origin Codes: 1 Onsite-process/service
Company's Internal Code(s): Pipe coatings/drippings

As of 09/18/1995, the next unassigned sequence number for WASTES is 6032.

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
FEB 20 1998
Environmental Bureau
Oil Conservation Division

Form C-1
Originated 8/
Submit Ori
Plus 1 C
to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ 2/Rick 2/6/98 Verbal Approval Received: Yes ☒ No ☐	4. Generator Schlumberger Well Service 5. Originating Site Hobbs facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter McClaskey
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 2527 West Bender	Hobbs, New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.
B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Schlumberger Well Service Hobbs facility. The material was generated by truck washing. I have included a certificate of waste and a chain of custody.

02-003

GAVE VERBAL APPROVAL (SUMP IS FULL)

FEB 1998 Received Hobbs OCD

1 la. Ind to H0665 2/23/98

Estimated Volume 100 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Billie Charo DATE: 02/02/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env Engr DATE: 2/6/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 2/20/98

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR Schlumberger Well Services

ADDRESS 2527 West Bender

GENERATING SITE SAME

COUNTY LEA STATE NM

TYPE OF WASTE WASH BAY SUMP SLUDGE

ESTIMATED VOLUME 100 BBLS

GENERATING PROCESS TRUCK WASHING

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY McCLASKEY

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT [signature]
SIGNATURE

NAME Keith Drake
PRINTED

ADDRESS 2527 WEST BENDER

DATE 2-2-98

FEB 1998 Received Hobbs OCD

TOTAL P.02

Intertek Testing Services
Environmental Laboratories

REPORT DATE : 30-JUN-1997 REPORT NUMBER : D97-7622

SAMPLE SUBMITTED BY : Schlumberger Well Service
ATTENTION : Mr. Keith Drake
PROJECT : Wash Bay Sump Sludge

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Sulfide, Reactive
BATCH NO.	085056
LCS LOT NO.	809031E
PREP METHOD	---
PREPARED BY	---
ANALYSIS METHOD	EPA 9030
ANALYZED BY	ADG
UNITS	mg/Kg
METHOD BLANK	< 10.0
SPIKE LEVEL	---
SPK REC LIMITS	---
SPK RPD LIMITS	---
MS RESULT	NA
MS RECOVERY %	NA
MSD RESULT	NA
MSD RECOVERY %	NA
MS/MSD RPD %	NA
BS RESULT	NA
BS RECOVERY %	NA
BSD RESULT	NA
BSD RECOVERY %	NA
BS/BSD RPD %	NA
DUP RPD LIMITS	---
DUPLICATE RPD %	NA
LCS LEVEL	1000
LCS REC LIMITS	0.00 - 100
LCS RESULT	1080
LCS RECOVERY %	108
SPIKE SAMPLE ID	---
SAMPLE VALUE	---
DUP SAMPLE ID	---
DUP SAMPLE VAL/1	---
DUP SAMPLE VAL/2	---

NA Not applicable

FEB 1998 Received Hobbs OCD

Intertek Testing Services NA Inc.
1089 East Collins Boulevard Richardson, TX 75081
Telephone (972) 238-5591 Fax (972) 238-5592

ITS Environmental Laboratories 1089 East Collins Blvd., #100 Richardson, TX 75081 (972) 238-5591

CHAIN OF CUSTODY RECORD

Report to:	Invoice to
Company: Schlumberger	Company: Schlumberger
Address: ~~[illegible]~~ PO BOX 1770 Hobbs NM 88240	Address: PO Box 1770 Hobbs NM 88240
Contact: Keith Drake	Contact: Keith Drake
Phone: (505) 393-4107	Phone: (505) 393-4107
Fax: (505) 392-3925	PO/SO #:

Sampler's Name: Keith Drake

Sampler's Signature:

Proj. No.

Project Name: WASH BAY SUMP SLUDGE

No./Type of Containers[2]: 2/JARS A/G

Matrix[1]	Date	Time	Comp	Grab	Identifying Marks of Sample(s)	VOA	A/G 1 Lt.	250 ml	P/O	Lab Sample ID (Lab Use Only)
SL	6/19	1700			GLASS BOTTLE CABLECO TESTING					7622-1
SL	6/19	1700			GLASS BOTTLE CABLECO WIRELINE					7622-2

ANALYSIS REQUESTED: X RCT

Received Hobbs NM 1998 FEB 00

Lab use only
Due Date:

Temp. of coolers when received (C°): 1 4 2 3 4 5

Custody Seal N / Y
Intact N / Y

Screened For Radioactivity: X

Turn around time: X Priority 1 or Standard ☐ Priority 2 or 50% ☐ Priority 3 or 100% ☐ Priority 4 ERS *

* BTEX (602/8020), TPH (418.1 or 8015), VOLATILES (624/8240), IGNITABILITY, TOTAL LEAD (6010)

Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)	Date:	Time:
[signature]	6-19-97	1700	Stephen Baker	6/20/97	1030
[signature]	6-19-97	1700			
[signature]	6-1957	1700			

Remarks

ORIGINAL

Client's delivery of samples constitutes acceptance of Inchcape/ITS-Dallas terms and conditions contained in the Price Schedule.

[1] Matrix: WW - Wastewater; W - Water; S - Soil; SD - Solid; L - Liquid; A - Air Bag; C - Charcoal tube; SL - Sludge; O - Oil

[2] Container: VOA - 40 ml vial; A/G - Amber / Or Glass 1 Liter; 250 ml - Glass wide mouth; P/O - Plastic or other _____

Inchcape cannot accept verbal changes. Please Fax written changes to 972-238-5592

OFFICE USE ONLY

02/02/98 MON 11:40 FAX 1 505 392 3925 HUBBS SWS 001

Intertek Testing Services
Environmental Laboratories

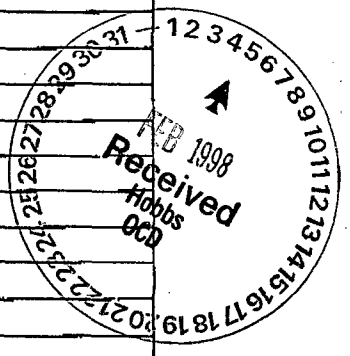
REPORT DATE : 30-JUN-1997 REPORT NUMBER : D97-7622

SAMPLE SUBMITTED BY : Schlumberger Well Service
ATTENTION : Mr. Keith Drake
PROJECT : Wash Bay Sump Sludge

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Cyanide, Reactive	pH	pH	Ignitability (by Flashpoint)
BATCH NO.	085055	119031	119030	934061
LCS LOT NO.	981076C	9976	9976	5450 KPLX
PREP METHOD	---	---	---	---
PREPARED BY	---	---	---	---
ANALYSIS METHOD	EPA 9010	EPA 9040/45	EPA 9040/45	EPA 1010
ANALYZED BY	ADG	AKJ	AKJ	SAB
UNITS	mg/Kg	---	---	Deg. F
METHOD BLANK	< 0.100			
SPIKE LEVEL	---	---	---	---
SPK REC LIMITS	---	---	---	---
SPK RPD LIMITS	---	---	---	---
MS RESULT	NA	NA	NA	NA
MS RECOVERY %	NA	NA	NA	NA
MSD RESULT	NA	NA	NA	NA
MSD RECOVERY %	NA	NA	NA	NA
MS/MSD RPD %	NA	NA	NA	NA
BS RESULT	NA	NA	NA	NA
BS RECOVERY %	NA	NA	NA	NA
BSD RESULT	NA	NA	NA	NA
BSD RECOVERY %	NA	NA	NA	NA
BS/BSD RPD %	NA	NA	NA	NA
DUP RPD LIMITS	---	5.00	5.00	10.0
DUPLICATE RPD %	NA	0.00	0.00	0.00
LCS LEVEL	2.00	9.14	9.14	81.0
LCS REC LIMITS	20.0 - 50.0	95.0 - 105	95.0 - 105	90.0 - 110
LCS RESULT	0.617	9.20	9.20	80.3
LCS RECOVERY %	30.9	101	101	99.1
SPIKE SAMPLE ID	---	---	---	---
SAMPLE VALUE	---	---	---	---
DUP SAMPLE ID	---	7729-2	7763-1	7925-1
DUP SAMPLE VAL/1	---	8.10	5.90	84.8
DUP SAMPLE VAL/2	---	8.10	5.90	84.8

NA Not applicable



Intertek Testing Services NA Inc.
1089 East Collins Boulevard Richardson, TX 75081
Telephone (972) 238-5591 Fax (972) 238-5592

Intertek Testing Services
Environmental Laboratories

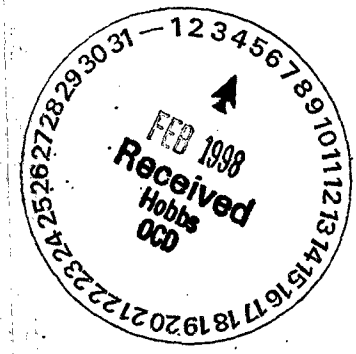
REPORT DATE : 30-JUN-1997 REPORT NUMBER : D97-7622

SAMPLE SUBMITTED BY : Schlumberger Well Service
ATTENTION : Mr. Keith Drake
PROJECT : Wash Bay Sump Sludge

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Sulfide, Reactive
BATCH NO.	085056
LCS LOT NO.	809031E
PREP METHOD	---
PREPARED BY	---
ANALYSIS METHOD	EPA 9030
ANALYZED BY	ADG
UNITS	mg/Kg
METHOD BLANK	< 10.0
SPIKE LEVEL	---
SPK REC LIMITS	---
SPK RPD LIMITS	---
MS RESULT	NA
MS RECOVERY %	NA
MSD RESULT	NA
MSD RECOVERY %	NA
MS/MSD RPD %	NA
BS RESULT	NA
BS RECOVERY %	NA
BSD RESULT	NA
BSD RECOVERY %	NA
BS/BSD RPD %	NA
DUP RPD LIMITS	---
DUPLICATE RPD %	NA
LCS LEVEL	1000
LCS REC LIMITS	0.00 - 100
LCS RESULT	1080
LCS RECOVERY %	108
SPIKE SAMPLE ID	---
SAMPLE VALUE	---
DUP SAMPLE ID	---
DUP SAMPLE VAL/1	---
DUP SAMPLE VAL/2	---

NA Not applicable



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ITS Environmental Laboratories 1089 East Collins Blvd., #100 Richardson, TX 75081 (972) 238-5591

CHAIN OF CUSTODY RECORD

Report to:
Company: Schlumberger
Address: ~~P~~ PO BOX 1770
Hobbs NM 88240
Contact: Keith DRAKE
Phone: (505) 393-4107
Fax: (505) 392-3925

Invoice to
Company: Schlumberger
Address: PO BOX 1770
Hobbs NM 88240
Contact: Keith DRAKE
Phone: (505) 393-4107
PO/SO #:

ANALYSIS REQUESTED

Lab use only
Due Date:

Temp. of coolers when received (C°):
1 | 2 | 3 | 4 | 5
Custody Seal N / Y
Intact N Y

Screened For Radioactivity ☒

Received FEB 1998 Hobbs OCD

Sampler's Name: Keith DRAKE
Sampler's Signature:

Proj. No.
Project Name: WASH BAY SUMP SLUDGE
No./Type of Containers[2]: 2/JARS A/G

Matrix[1]	Date	Time	Comp	Grab	Identifying Marks of Sample(s)	VOA	A/G 1 Lit.	250 ml	P/O	RCT	Lab Sample ID (Lab Use Only)
SL	6/19	1700			GLASS BOTTLE CARCCO TESTING					X	7622-1
SL	6/19	1700			GLASS BOTTLE CARLCO WIRELINE						2

Turn around time: ☒ Priority 1 or Standard ☐ Priority 2 or 50% ☐ Priority 3 or 100% ☐ Priority 4 ERS *

* BTEX (602/8020), TPH (418.1 or 8015), VOLATILES (624/8240), IGNITABILITY, TOTAL LEAD (6010)

Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)	Date:	Time:
	6-19-97	1700	Stephen Baker	6/20/97	1030
Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)	Date:	Time:
	6-1997	1700			
Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)	Date:	Time:
	6-1997	1700			

Remarks

ORIGINAL

Client's delivery of samples constitutes acceptance of Inchcape/ITS-Dallas terms and conditions contained in the Price Schedule.

[1] Matrix: WW - Wastewater; W - Water; S - Soil; SD - Solid; L - Liquid; A - Air Bag; C - Charcoal tube; SL - Sludge; O - Oil
[2] Container: VOA - 40 ml vial; A/G - Amber / Or Glass 1 Liter; 250 ml - Glass wide mouth; P/O - Plastic or other

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OFFICE USE ONLY

Inchcape Testing Services
Environmental Laboratories

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Fax 972-238-5592

DATE RECEIVED : 17-MAR-1997

REPORT NUMBER : D97-3141-1
REPORT DATE : 31-MAR-1997

SAMPLE SUBMITTED BY : Schlumberger Well Service
ADDRESS : 2527 W. Bender
: Hobbs, NM 88240
ATTENTION : Mr. Keith Drake

SAMPLE MATRIX : Sludge
ID MARKS : Testing Sump
PROJECT : Wash Bay Sump Sludge
DATE SAMPLED : 17-MAR-1997
PREPARATION METHOD : EPA 1311/3520B
PREPARED BY : HCS
PREPARED ON : 19-MAR-1997
ANALYSIS METHOD : EPA 1311/8270B /1
ANALYZED BY : VDL
ANALYZED ON : 20-MAR-1997
DILUTION FACTOR : 1
METHOD FACTOR : 10
QC BATCH NO : AC051-83

TCLP EXTRACTABLE ORGANICS			
TEST REQUESTED	DETECTION LIMIT		RESULTS
o-Cresol	0.20 mg/L	<	0.20 mg/L
m,p-Cresol	0.20 mg/L	<	0.20 mg/L
1,4-Dichlorobenzene	0.10 mg/L	<	0.10 mg/L
2,4-Dinitrotoluene	0.10 mg/L	<	0.10 mg/L
Hexachlorobenzene	0.10 mg/L	<	0.10 mg/L
Hexachlorobutadiene	0.10 mg/L	<	0.10 mg/L
Hexachloroethane	0.10 mg/L	<	0.10 mg/L
Nitrobenzene	0.10 mg/L	<	0.10 mg/L
Pentachlorophenol	0.50 mg/L	<	0.50 mg/L
Pyridine	0.10 mg/L	<	0.10 mg/L
2,4,5-Trichlorophenol	0.10 mg/L	<	0.10 mg/L
2,4,6-Trichlorophenol	0.10 mg/L	<	0.10 mg/L

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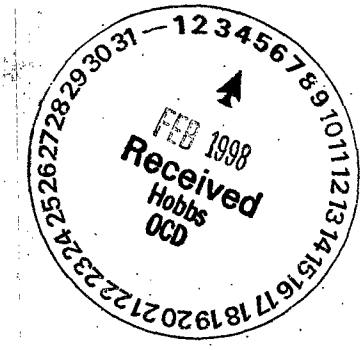
Fax 972-238-5592

REPORT NUMBER : D97-3141-1
ANALYSIS METHOD : EPA 1311/8270B /1

QUALITY CONTROL DATA		
SURROGATE COMPOUND		SPIKE RECOVERED
Nitrobenzene-d5 (SS)		81.0 %
2-Fluorobiphenyl (SS)		95.0 %
Terphenyl-d14 (SS)		50.2 %
Phenol-d6 (SS)		90.9 %
2-Fluorophenol (SS)		66.3 %
2,4,6-Tribromophenol (SS)		100 %



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Fax 972-238-5592

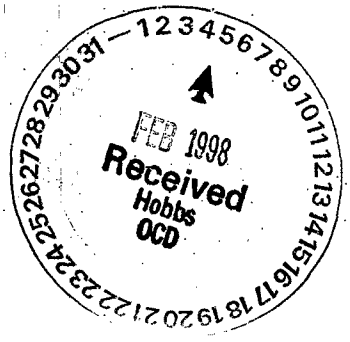
DATE RECEIVED : 17-MAR-1997

REPORT NUMBER : D97-3141-1
REPORT DATE : 31-MAR-1997

SAMPLE SUBMITTED BY : Schlumberger Well Service
ADDRESS : 2527 W. Bender
: Hobbs, NM 88240
ATTENTION : Mr. Keith Drake

SAMPLE MATRIX : Sludge
ID MARKS : Testing Sump
PROJECT : Wash Bay Sump Sludge
DATE SAMPLED : 17-MAR-1997
PREPARATION METHOD : EPA 1311/5030
PREPARED BY : DTA
PREPARED ON : 21-MAR-1997
ANALYSIS METHOD : EPA 1311/8240 /1
ANALYZED BY : DTA
ANALYZED ON : 21-MAR-1997
DILUTION FACTOR : 20
QC BATCH NO : 032182401B

TCLP VOLATILE ORGANICS		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Benzene	0.10 mg/L	< 0.10 mg/L
Carbon tetrachloride	0.10 mg/L	< 0.10 mg/L
Chlorobenzene	0.10 mg/L	< 0.10 mg/L
Chloroform	0.10 mg/L	< 0.10 mg/L
1,2-Dichloroethane	0.10 mg/L	< 0.10 mg/L
1,1-Dichloroethene	0.10 mg/L	< 0.10 mg/L
Methyl ethyl ketone	1.00 mg/L	< 1.00 mg/L
Tetrachloroethene	0.10 mg/L	< 0.10 mg/L
Trichloroethene	0.10 mg/L	< 0.10 mg/L
Vinyl chloride	0.10 mg/L	< 0.10 mg/L



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Tel. 972-238-5591
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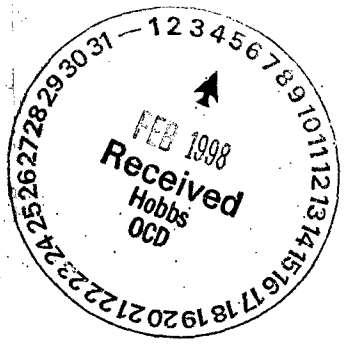
REPORT NUMBER : D97-3141-1
ANALYSIS METHOD : EPA 1311/8240 /1

QUALITY CONTROL DATA		
SURROGATE COMPOUND		SPIKE RECOVERED
1,2-Dichloroethane-d4 (SS)		92.1 %
Toluene-d8 (SS)		98.9 %
Bromofluorobenzene (SS)		98.9 %



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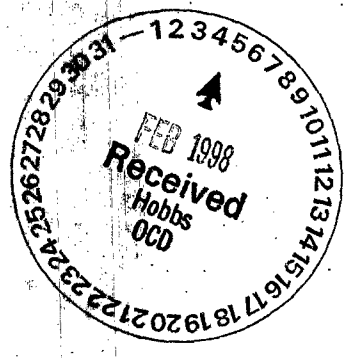
DATE RECEIVED : 17-MAR-1997

REPORT NUMBER : D97-3141-1
REPORT DATE : 31-MAR-1997

SAMPLE SUBMITTED BY : Schlumberger Well Service
ADDRESS : 2527 W. Bender
: Hobbs, NM 88240
ATTENTION : Mr. Keith Drake

SAMPLE MATRIX : Sludge
ID MARKS : Testing Sump
PROJECT : Wash Bay Sump Sludge
DATE SAMPLED : 17-MAR-1997
PREPARATION METHOD : EPA 418.1 mod.
PREPARED BY : RRP
PREPARED ON : 19-MAR-1997
ANALYSIS METHOD : EPA 418.1 mod. /1
ANALYZED BY : MTR
ANALYZED ON : 19-MAR-1997
DILUTION FACTOR : 1000
QC BATCH NO : AB944-93

TOTAL RECOVERABLE PETROLEUM HYDROCARBONS		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Total Petroleum Hydrocarbon	10000 mg/Kg	200000 mg/Kg



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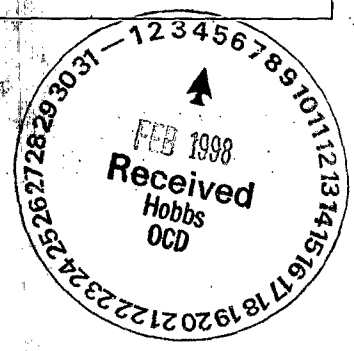
DATE RECEIVED : 17-MAR-1997

REPORT NUMBER : D97-3141-1
REPORT DATE : 31-MAR-1997

SAMPLE SUBMITTED BY : Schlumberger Well Service
ADDRESS : 2527 W. Bender
: Hobbs, NM 88240
ATTENTION : Mr. Keith Drake

SAMPLE MATRIX : Sludge
ID MARKS : Testing Sump
PROJECT : Wash Bay Sump Sludge
DATE SAMPLED : 17-MAR-1997

TCLP METALS			
TEST REQUESTED		DETECTION LIMIT	RESULTS
Silver	/1	0.0200 mg/L	< 0.0200 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 19-MAR-1997 by CEL Analyzed using EPA 6010A on 20-MAR-1997 by GGD QC Batch No : 16465			
Arsenic	/1	0.200 mg/L	< 0.200 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 19-MAR-1997 by CEL Analyzed using EPA 6010A on 20-MAR-1997 by GGD QC Batch No : 16465			
Barium	/1	1.00 mg/L	1.22 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 19-MAR-1997 by CEL Analyzed using EPA 6010A on 20-MAR-1997 by GGD QC Batch No : 16465			
Cadmium	/1	0.020 mg/L	< 0.020 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 19-MAR-1997 by CEL Analyzed using EPA 6010A on 20-MAR-1997 by GGD QC Batch No : 16465			
Chromium	/1	0.0200 mg/L	< 0.0200 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 19-MAR-1997 by CEL Analyzed using EPA 6010A on 20-MAR-1997 by GGD QC Batch No : 16465			



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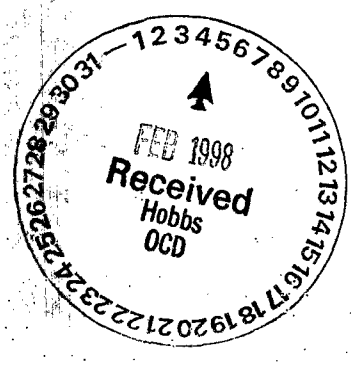
TCLP METALS			
TEST REQUESTED		DETECTION LIMIT	RESULTS
Mercury	/1	0.0010 mg/L	< 0.0010 mg/L
Dilution Factor : 1 Prepared using EPA 1311/7470 on 20-MAR-1997 by CEL Analyzed using EPA 7470 on 25-MAR-1997 by CGJ QC Batch No : HG-3424			
Lead	/1	0.200 mg/L	< 0.200 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 19-MAR-1997 by CEL Analyzed using EPA 6010A on 20-MAR-1997 by GGD QC Batch No : 16465			
Selenium	/1	0.200 mg/L	< 0.200 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 19-MAR-1997 by CEL Analyzed using EPA 6010A on 20-MAR-1997 by GGD QC Batch No : 16465			



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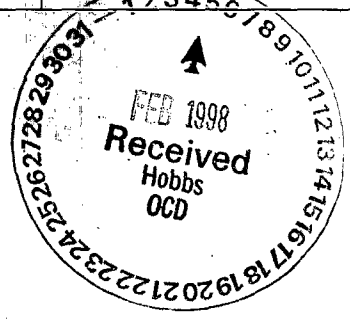
DATE RECEIVED : 17-MAR-1997

REPORT NUMBER : D97-3141-2
REPORT DATE : 31-MAR-1997

SAMPLE SUBMITTED BY : Schlumberger Well Service
ADDRESS : 2527 W. Bender
: Hobbs, NM 88240
ATTENTION : Mr. Keith Drake

SAMPLE MATRIX : Sludge
ID MARKS : Wireline Sump
PROJECT : Wash Bay Sump Sludge
DATE SAMPLED : 17-MAR-1997
PREPARATION METHOD : EPA 1311/3520B
PREPARED BY : HCS
PREPARED ON : 19-MAR-1997
ANALYSIS METHOD : EPA 1311/8270B /1
ANALYZED BY : VDL
ANALYZED ON : 20-MAR-1997
DILUTION FACTOR : 1
METHOD FACTOR : 10
QC BATCH NO : AC051-83

TCLP EXTRACTABLE ORGANICS			
TEST REQUESTED	DETECTION LIMIT		RESULTS
o-Cresol	0.20 mg/L	<	0.20 mg/L
m,p-Cresol	0.20 mg/L	<	0.20 mg/L
1,4-Dichlorobenzene	0.10 mg/L	<	0.10 mg/L
2,4-Dinitrotoluene	0.10 mg/L	<	0.10 mg/L
Hexachlorobenzene	0.10 mg/L	<	0.10 mg/L
Hexachlorobutadiene	0.10 mg/L	<	0.10 mg/L
Hexachloroethane	0.10 mg/L	<	0.10 mg/L
Nitrobenzene	0.10 mg/L	<	0.10 mg/L
Pentachlorophenol	0.50 mg/L	<	0.50 mg/L
Pyridine	0.10 mg/L	<	0.10 mg/L
2,4,5-Trichlorophenol	0.10 mg/L	<	0.10 mg/L
2,4,6-Trichlorophenol	0.10 mg/L	<	0.10 mg/L



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Tel. 972-238-5591
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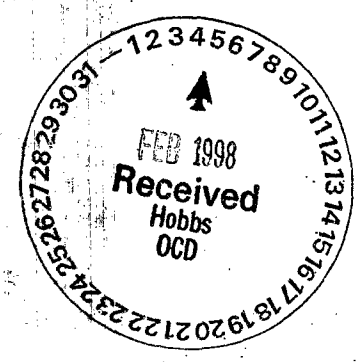
REPORT NUMBER : D97-3141-2
ANALYSIS METHOD : EPA 1311/8270B /1

QUALITY CONTROL DATA		
SURROGATE COMPOUND		SPIKE RECOVERED
Nitrobenzene-d5 (SS)		74.6 %
2-Fluorobiphenyl (SS)		82.8 %
Terphenyl-d14 (SS)		43.2 %
Phenol-d6 (SS)		79.2 %
2-Fluorophenol (SS)		64.7 %
2,4,6-Tribromophenol (SS)		78.7 %



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Tel. 972-238-5591
Fax 972-238-5592

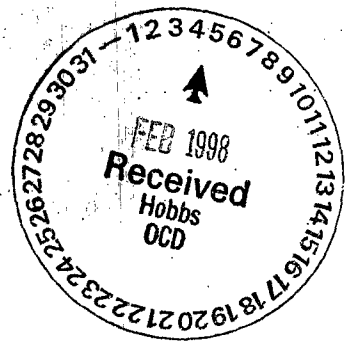
DATE RECEIVED : 17-MAR-1997

REPORT NUMBER : D97-3141-2
REPORT DATE : 31-MAR-1997

SAMPLE SUBMITTED BY : Schlumberger Well Service
ADDRESS : 2527 W. Bender
: Hobbs, NM 88240
ATTENTION : Mr. Keith Drake

SAMPLE MATRIX : Sludge
ID MARKS : Wireline Sump
PROJECT : Wash Bay Sump Sludge
DATE SAMPLED : 17-MAR-1997
PREPARATION METHOD : EPA 1311/5030
PREPARED BY : DTA
PREPARED ON : 21-MAR-1997
ANALYSIS METHOD : EPA 1311/8240 /1
ANALYZED BY : DTA
ANALYZED ON : 21-MAR-1997
DILUTION FACTOR : 20
QC BATCH NO : 032182401B

TCLP VOLATILE ORGANICS		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Benzene	0.10 mg/L	< 0.10 mg/L
Carbon tetrachloride	0.10 mg/L	< 0.10 mg/L
Chlorobenzene	0.10 mg/L	< 0.10 mg/L
Chloroform	0.10 mg/L	< 0.10 mg/L
1,2-Dichloroethane	0.10 mg/L	< 0.10 mg/L
1,1-Dichloroethene	0.10 mg/L	< 0.10 mg/L
Methyl ethyl ketone	1.00 mg/L	< 1.00 mg/L
Tetrachloroethene	0.10 mg/L	< 0.10 mg/L
Trichloroethene	0.10 mg/L	< 0.10 mg/L
Vinyl chloride	0.10 mg/L	< 0.10 mg/L



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Environmental Laboratories

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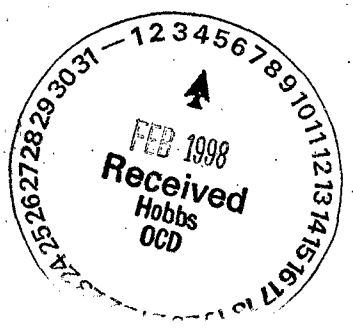
REPORT NUMBER : D97-3141-2
ANALYSIS METHOD : EPA 1311/8240 /1

QUALITY CONTROL DATA		
SURROGATE COMPOUND		SPIKE RECOVERED
1,2-Dichloroethane-d4 (SS)		92.3 %
Toluene-d8 (SS)		103 %
Bromofluorobenzene (SS)		100 %



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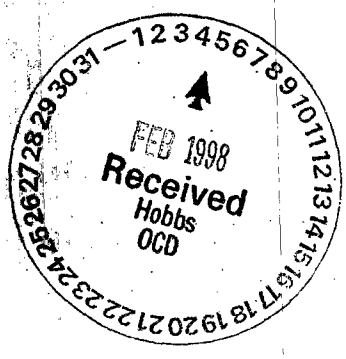
DATE RECEIVED : 17-MAR-1997

REPORT NUMBER : D97-3141-2
REPORT DATE : 31-MAR-1997

SAMPLE SUBMITTED BY : Schlumberger Well Service
ADDRESS : 2527 W. Bender
: Hobbs, NM 88240
ATTENTION : Mr. Keith Drake

SAMPLE MATRIX : Sludge
ID MARKS : Wireline Sump
PROJECT : Wash Bay Sump Sludge
DATE SAMPLED : 17-MAR-1997
PREPARATION METHOD : EPA 418.1 mod.
PREPARED BY : RRP
PREPARED ON : 20-MAR-1997
ANALYSIS METHOD : EPA 418.1 mod. /1
ANALYZED BY : RRP
ANALYZED ON : 20-MAR-1997
DILUTION FACTOR : 10
QC BATCH NO : AB944-95

TOTAL RECOVERABLE PETROLEUM HYDROCARBONS		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Total Petroleum Hydrocarbon	100 mg/Kg	2700 mg/Kg



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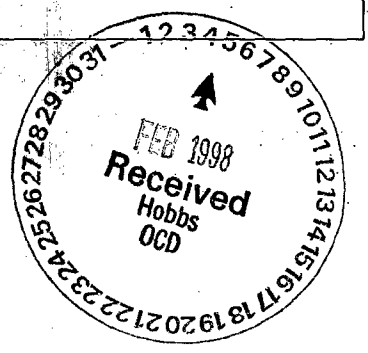
DATE RECEIVED : 17-MAR-1997

REPORT NUMBER : D97-3141-2
REPORT DATE : 31-MAR-1997

SAMPLE SUBMITTED BY : Schlumberger Well Service
ADDRESS : 2527 W. Bender
: Hobbs, NM 88240
ATTENTION : Mr. Keith Drake

SAMPLE MATRIX : Sludge
ID MARKS : Wireline Sump
PROJECT : Wash Bay Sump Sludge
DATE SAMPLED : 17-MAR-1997

TCLP METALS			
TEST REQUESTED		DETECTION LIMIT	RESULTS
Silver	/1	0.0200 mg/L	< 0.0200 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 25-MAR-1997 by CEL Analyzed using EPA 6010A on 26-MAR-1997 by GGD QC Batch No : 16497			
Arsenic	/1	0.200 mg/L	< 0.200 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 25-MAR-1997 by CEL Analyzed using EPA 6010A on 26-MAR-1997 by GGD QC Batch No : 16497			
Barium	/1	1.00 mg/L	< 1.00 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 25-MAR-1997 by CEL Analyzed using EPA 6010A on 26-MAR-1997 by GGD QC Batch No : 16497			
Cadmium	/1	0.020 mg/L	< 0.020 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 25-MAR-1997 by CEL Analyzed using EPA 6010A on 26-MAR-1997 by GGD QC Batch No : 16497			
Chromium	/1	0.0200 mg/L	< 0.0200 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 25-MAR-1997 by CEL Analyzed using EPA 6010A on 26-MAR-1997 by GGD QC Batch No : 16497			



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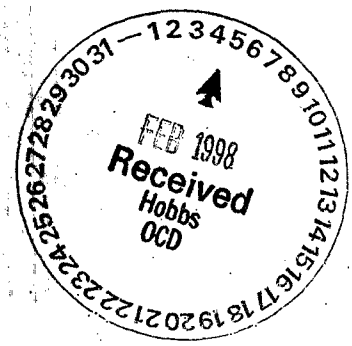
TCLP METALS			
TEST REQUESTED		DETECTION LIMIT	RESULTS
Mercury	/1	0.0010 mg/L	< 0.0010 mg/L
Dilution Factor : 1 Prepared using EPA 1311/7470 on 27-MAR-1997 by CEL Analyzed using EPA 7470 on 27-MAR-1997 by AH QC Batch No : HG-3564			
Lead	/1	0.200 mg/L	< 0.200 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 25-MAR-1997 by CEL Analyzed using EPA 6010A on 26-MAR-1997 by GGD QC Batch No : 16497			
Selenium	/1	0.200 mg/L	< 0.200 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 25-MAR-1997 by CEL Analyzed using EPA 6010A on 26-MAR-1997 by GGD QC Batch No : 16497			



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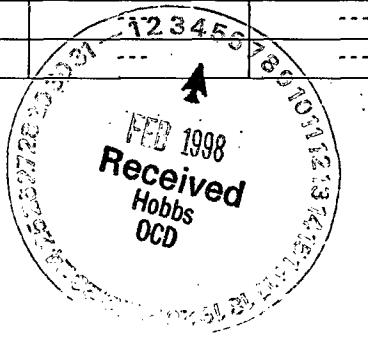
REPORT DATE : 31-MAR-1997 REPORT NUMBER : D97-3141

SAMPLE SUBMITTED BY : Schlumberger Well Service
ATTENTION : Mr. Keith Drake
PROJECT : Wash Bay Sump Sludge

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Pyridine	o-Cresol	m,p-Cresol	Hexachloroethane	Nitrobenzene
BATCH NO.	AC051-83	AC051-83	AC051-83	AC051-83	AC051-83
LCS LOT NO.	AB988-59	AB988-59	AB988-59	AB988-59	AB988-59
PREP METHOD	EPA 1311/3520B	EPA 1311/3520B	EPA 1311/3520B	EPA 1311/3520B	EPA 1311/3520B
PREPARED BY	HCS	HCS	HCS	HCS	HCS
ANALYSIS METHOD	EPA 1311/8270B	EPA 1311/8270B	EPA 1311/8270B	EPA 1311/8270B	EPA 1311/8270B
ANALYZED BY	WWY	WWY	WWY	WWY	WWY
UNITS	mg/L	mg/L	mg/L	mg/L	mg/L
METHOD BLANK	< 0.100	< 0.200	< 0.200	< 0.100	< 0.100
SPIKE LEVEL	1.00	1.00	2.00	1.00	1.00
SPK REC LIMITS	10.0 - 227	10.0 - 145	10.0 - 145	40.0 - 113	35.0 - 180
SPK RPD LIMITS	70.0	25.0	25.0	25.0	39.0
MS RESULT	0.825	0.931	1.92	0.839	1.01
MS RECOVERY %	82.5	93.1	96.0	83.9	101
MSD RESULT	0.952	0.913	1.94	0.800	1.03
MSD RECOVERY %	95.2	91.3	97.0	80.0	103
MS/MSD RPD %	14.3	1.95	1.04	4.76	1.96
BS RESULT	1.00	0.903	1.92	0.800	1.02
BS RECOVERY %	100	90.3	96.0	80.0	102
BSD RESULT	0.812	0.878	1.94	0.799	1.01
BSD RECOVERY %	81.2	87.8	97.0	79.9	101
BS/BSD RPD %	20.8	2.81	1.04	0.13	0.99
DUP RPD LIMITS	---	---	---	---	---
DUPLICATE RPD %	NA	NA	NA	NA	NA
LCS LEVEL	1.00	1.00	2.00	1.00	1.00
LCS REC LIMITS	10.0 - 227	10.0 - 145	10.0 - 145	40.0 - 113	35.0 - 180
LCS RESULT	SEE_BS	SEE_BS	SEE_BS	SEE_BS	SEE_BS
LCS RECOVERY %	SEE_BS	SEE_BS	SEE_BS	SEE_BS	SEE_BS
SPIKE SAMPLE ID	3111-1	3111-1	3111-1	3111-1	3111-1
SAMPLE VALUE	< 0.100	< 0.200	< 0.200	< 0.100	< 0.100
DUP SAMPLE ID	---	---	---	---	---
DUP SAMPLE VAL/1	---	---	---	---	---
DUP SAMPLE VAL/2	---	---	---	---	---

SEE_BS LCS and LCS Duplicate reported as BS and BSD.
NA Not applicable



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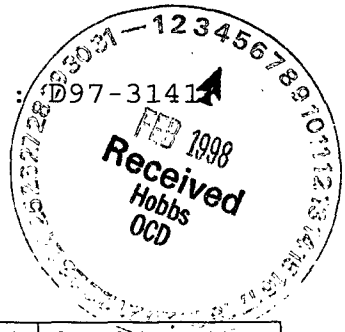

REPORT DATE : 31-MAR-1997 REPORT NUMBER : D97-3141

SAMPLE SUBMITTED BY : Schlumberger Well Service
ATTENTION : Mr. Keith Drake
PROJECT : Wash Bay Sump Sludge

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Hexachlorobutadiene	2,4,6-Trichlorophenol	2,4,5-Trichlorophenol	2,4-Dinitrotoluene
BATCH NO.	AC051-83	AC051-83	AC051-83	AC051-83
LCS LOT NO.	AB988-59	AB988-59	AB988-59	AB988-59
PREP METHOD	EPA 1311/3520B	EPA 1311/3520B	EPA 1311/3520B	EPA 1311/3520B
PREPARED BY	HCS	HCS	HCS	HCS
ANALYSIS METHOD	EPA 1311/8270B	EPA 1311/8270B	EPA 1311/8270B	EPA 1311/8270B
ANALYZED BY	WWY	WWY	WWY	WWY
UNITS	mg/L	mg/L	mg/L	mg/L
METHOD BLANK	< 0.100	< 0.100	< 0.100	< 0.100
SPIKE LEVEL	1.00	1.00	1.00	1.00
SPK REC LIMITS	24.0 - 116	37.0 - 144	35.0 - 140	39.0 - 139
SPK RPD LIMITS	26.0	32.0	25.0	22.0
MS RESULT	0.880	0.926	0.962	0.712
MS RECOVERY %	88.0	92.6	96.2	71.2
MSD RESULT	0.880	0.934	0.994	0.739
MSD RECOVERY %	88.0	93.4	99.4	73.9
MS/MSD RPD %	0.00	0.86	3.27	3.72
BS RESULT	0.872	0.944	0.989	0.774
BS RECOVERY %	87.2	94.4	98.9	77.4
BSD RESULT	0.926	0.968	0.978	0.774
BSD RECOVERY %	92.6	96.8	97.8	77.4
BS/BSD RPD %	6.01	2.51	1.12	0.00
DUP RPD LIMITS	---	---	---	---
DUPLICATE RPD %	NA	NA	NA	NA
LCS LEVEL	1.00	1.00	1.00	1.00
LCS REC LIMITS	24.0 - 116	37.0 - 144	35.0 - 140	39.0 - 139
LCS RESULT	SEE_BS	SEE_BS	SEE_BS	SEE_BS
LCS RECOVERY %	SEE_BS	SEE_BS	SEE_BS	SEE_BS
SPIKE SAMPLE ID	3111-1	3111-1	3111-1	3111-1
SAMPLE VALUE	< 0.100	< 0.100	< 0.100	< 0.100
DUP SAMPLE ID	---	---	---	---
DUP SAMPLE VAL/1	---	---	---	---
DUP SAMPLE VAL/2	---	---	---	---

SEE_BS LCS and LCS Duplicate reported as BS and BSD.
NA Not applicable

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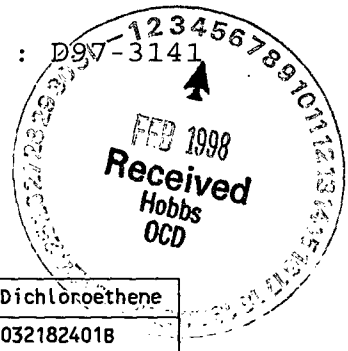

REPORT DATE : 31-MAR-1997 REPORT NUMBER : D97-3141

SAMPLE SUBMITTED BY : Schlumberger Well Service
ATTENTION : Mr. Keith Drake
PROJECT : Wash Bay Sump Sludge

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Chloroform	1,4-Dichlorobenzene	1,2-Dichloroethane	1,1-Dichloroethene
BATCH NO.	032182401B	032182401B	032182401B	032182401B
LCS LOT NO.	AB598-58-2	AB598-58-2	AB598-58-2	AB598-58-2
PREP METHOD	EPA 1311/5030	EPA 1311/5030	EPA 1311/5030	EPA 1311/5030
PREPARED BY	DTA	DTA	DTA	DTA
ANALYSIS METHOD	EPA 1311/8240	EPA 1311/8240	EPA 1311/8240	EPA 1311/8240
ANALYZED BY	DTA	DTA	DTA	DTA
UNITS	mg/L	mg/L	mg/L	mg/L
METHOD BLANK	< 0.100	< 0.100	< 0.100	< 0.100
SPIKE LEVEL	1.00	1.00	1.00	1.00
SPK REC LIMITS	51.0 - 138	20.0 - 124	49.0 - 155	55.0 - 130
SPK RPD LIMITS	31.0	32.0	30.0	41.0
MS RESULT	1.00	1.00	0.960	1.00
MS RECOVERY %	100	100	96.0	100
MSD RESULT	1.00	0.990	0.950	1.00
MSD RECOVERY %	100	99.0	95.0	100
MS/MSD RPD %	0.00	1.01	1.05	0.00
BS RESULT	1.00	1.00	1.00	1.00
BS RECOVERY %	100	100	100	100
BSD RESULT	1.00	1.10	1.00	1.00
BSD RECOVERY %	100	110	100	100
BS/BSD RPD %	0.00	9.52	0.00	0.00
DUP RPD LIMITS	---	---	---	---
DUPLICATE RPD %	NA	NA	NA	NA
LCS LEVEL	1.00	1.00	1.00	1.00
LCS REC LIMITS	51.0 - 138	20.0 - 124	49.0 - 155	55.0 - 130
LCS RESULT	SEE_BS	SEE_BS	SEE_BS	SEE_BS
LCS RECOVERY %	SEE_BS	SEE_BS	SEE_BS	SEE_BS
SPIKE SAMPLE ID	3111-1	3111-1	3111-1	3111-1
SAMPLE VALUE	< 0.100	< 0.100	< 0.100	< 0.100
DUP SAMPLE ID	---	---	---	---
DUP SAMPLE VAL/1	---	---	---	---
DUP SAMPLE VAL/2	---	---	---	---

SEE_BS LCS and LCS Duplicate reported as BS and BSD.
NA Not applicable

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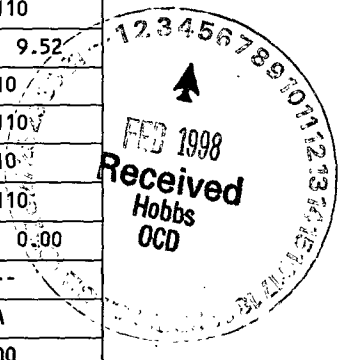
REPORT DATE : 31-MAR-1997 REPORT NUMBER : D97-3141

SAMPLE SUBMITTED BY : Schlumberger Well Service
ATTENTION : Mr. Keith Drake
PROJECT : Wash Bay Sump Sludge

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Methyl ethyl ketone	Tetrachloroethene	Trichloroethene	Vinyl chloride
BATCH NO.	032182401B	032182401B	032182401B	032182401B
LCS LOT NO.	AB598-58-2	AB598-58-2	AB598-58-2	AB598-58-2
PREP METHOD	EPA 1311/5030	EPA 1311/5030	EPA 1311/5030	EPA 1311/5030
PREPARED BY	DTA	DTA	DTA	DTA
ANALYSIS METHOD	EPA 1311/8240	EPA 1311/8240	EPA 1311/8240	EPA 1311/8240
ANALYZED BY	DTA	DTA	DTA	DTA
UNITS	mg/L	mg/L	mg/L	mg/L
METHOD BLANK	< 1.00	< 0.100	< 0.100	< 0.100
SPIKE LEVEL	1.00	1.00	1.00	1.00
SPK REC LIMITS	35.0 - 150	64.0 - 148	60.0 - 140	10.0 - 251
SPK RPD LIMITS	25.0	25.0	33.0	100
MS RESULT	0.910	1.00	0.990	1.00
MS RECOVERY %	91.0	100	99.0	100
MSD RESULT	1.00	1.00	1.00	1.10
MSD RECOVERY %	100	100	100	110
MS/MSD RPD %	9.42	0.00	1.01	9.52
BS RESULT	1.10	1.00	1.00	1.10
BS RECOVERY %	110	100	100	110
BSD RESULT	1.00	1.00	1.10	1.10
BSD RECOVERY %	100	100	110	110
BS/BSD RPD %	9.52	0.00	9.52	0.00
DUP RPD LIMITS	---	---	---	---
DUPLICATE RPD %	NA	NA	NA	NA
LCS LEVEL	1.00	1.00	1.00	1.00
LCS REC LIMITS	35.0 - 150	64.0 - 148	60.0 - 140	10.0 - 251
LCS RESULT	SEE_BS	SEE_BS	SEE_BS	SEE_BS
LCS RECOVERY %	SEE_BS	SEE_BS	SEE_BS	SEE_BS
SPIKE SAMPLE ID	3111-1	3111-1	3111-1	3111-1
SAMPLE VALUE	< 1.00	< 0.100	< 0.100	< 0.100
DUP SAMPLE ID	---	---	---	---
DUP SAMPLE VAL/1	---	---	---	---
DUP SAMPLE VAL/2	---	---	---	---

SEE_BS LCS and LCS Duplicate reported as BS and BSD.
NA Not applicable



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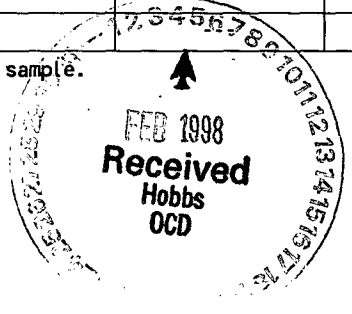
REPORT DATE : 31-MAR-1997 REPORT NUMBER : D97-3141

SAMPLE SUBMITTED BY : Schlumberger Well Service
ATTENTION : Mr. Keith Drake
PROJECT : Wash Bay Sump Sludge

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Total Recoverable Hydrocarbons	Total Recoverable Hydrocarbons	Silver	Silver
BATCH NO.	AB944-93	AB944-95	16465	16497
LCS LOT NO.	AA601-24C	AA601-24C	---	AC005-16F,G
PREP METHOD	EPA 418.1 mod.	EPA 418.1 mod.	EPA 1311/3015	EPA 1311/3015
PREPARED BY	RRP	RRP	CEL	CEL
ANALYSIS METHOD	EPA 418.1 mod.	EPA 418.1 mod.	EPA 6010A	EPA 6010A
ANALYZED BY	MTR	RRP	GGD	GGD
UNITS	mg/Kg	mg/Kg	mg/L	mg/L
METHOD BLANK	< 10.0	< 10.0	0.0273	< 0.0200
SPIKE LEVEL	100	100	0.200	0.200
SPK REC LIMITS	75.0 - 125	75.0 - 125	70.0 - 130	70.0 - 130
SPK RPD LIMITS	25.0	25.0	20.0	20.0
MS RESULT	F	132	0.210	0.188
MS RECOVERY %	F	102	105	94.0
MSD RESULT	F	137	0.212	0.176
MSD RECOVERY %	F	107	106	88.0
MS/MSD RPD %	F	5.06	0.95	6.59
BS RESULT	107	103	NA	NA
BS RECOVERY %	107	103	NA	NA
BSD RESULT	103	107	NA	NA
BSD RECOVERY %	103	107	NA	NA
BS/BSD RPD %	3.24	3.24	NA	NA
DUP RPD LIMITS	---	---	---	---
DUPLICATE RPD %	NA	NA	NC	NC
LCS LEVEL	100	100	0.200	0.200
LCS REC LIMITS	75.0 - 125	75.0 - 125	70.0 - 130	70.0 - 130
LCS RESULT	SEE_BS	SEE_BS	0.213	0.211
LCS RECOVERY %	SEE_BS	SEE_BS	107	106
SPIKE SAMPLE ID	3157-2	3257-2	3046-1	3141-2
SAMPLE VALUE	---	30.0	< 0.0200	< 0.0200
DUP SAMPLE ID	---	---	3046-1	3141-2
DUP SAMPLE VAL/1	---	---	---	---
DUP SAMPLE VAL/2	---	---	---	---

F Not applicable due to high analyte concentration in the QC sample.
SEE_BS LCS and LCS Duplicate reported as BS and BSD.
NA Not applicable
NC Not calculable



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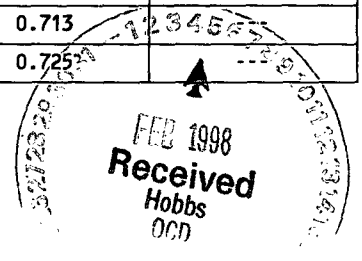
REPORT DATE : 31-MAR-1997 REPORT NUMBER : D97-3141

SAMPLE SUBMITTED BY : Schlumberger Well Service
ATTENTION : Mr. Keith Drake
PROJECT : Wash Bay Sump Sludge

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Arsenic	Arsenic	Barium	Barium	Cadmium
BATCH NO.	16465	16497	16465	16497	16465
LCS LOT NO.	---	AC005-16F,G	---	AC005-16F,G	---
PREP METHOD	EPA 1311/3015	EPA 1311/3015	EPA 1311/3015	EPA 1311/3015	EPA 1311/3015
PREPARED BY	CEL	CEL	CEL	CEL	CEL
ANALYSIS METHOD	EPA 6010A	EPA 6010A	EPA 6010A	EPA 6010A	EPA 6010A
ANALYZED BY	GGD	GGD	GGD	GGD	GGD
UNITS	mg/L	mg/L	mg/L	mg/L	mg/L
METHOD BLANK	< 0.200	< 0.200	< 1.00	< 1.00	< 0.0200
SPIKE LEVEL	1.00	1.00	1.00	1.00	0.500
SPK REC LIMITS	60.0 - 140	60.0 - 140	70.0 - 130	70.0 - 130	80.0 - 120
SPK RPD LIMITS	20.0	20.0	20.0	20.0	20.0
MS RESULT	0.989	0.953	1.45	1.61	0.468
MS RECOVERY %	98.9	95.3	145 B	88.5	93.6
MSD RESULT	0.992	1.08	1.46	1.71	0.469
MSD RECOVERY %	99.2	108	146 B	98.5	93.8
MS/MSD RPD %	0.30	12.5	0.69 B	10.7	0.21
BS RESULT	NA	NA	NA	NA	NA
BS RECOVERY %	NA	NA	NA	NA	NA
BSD RESULT	NA	NA	NA	NA	NA
BSD RECOVERY %	NA	NA	NA	NA	NA
BS/BSD RPD %	NA	NA	NA	NA	NA
DUP RPD LIMITS	---	---	---	20.0	---
DUPLICATE RPD %	NC	NC	NC	1.67	NC
LCS LEVEL	1.00	1.00	1.00	1.00	0.500
LCS REC LIMITS	60.0 - 140	60.0 - 140	70.0 - 130	70.0 - 130	80.0 - 120
LCS RESULT	1.01	1.01	1.22	1.21	0.495
LCS RECOVERY %	101	101	122	121	99.0
SPIKE SAMPLE ID	3046-1	3141-2	3046-1	3141-2	3046-1
SAMPLE VALUE	< 0.200	< 0.200	< 1.00	0.725	< 0.0200
DUP SAMPLE ID	3046-1	3141-2	3046-1	3141-2	3046-1
DUP SAMPLE VAL/1	---	---	---	0.713	---
DUP SAMPLE VAL/2	---	---	---	0.725	---

NA Not applicable
NC Not calculable
_B Not applicable due to matrix interference in the QC Sample.



Inchcape Testing Services
Environmental Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 972-238-5591
Fax 972-238-5592

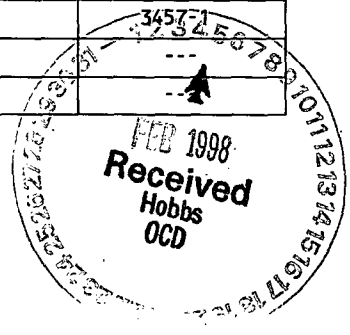
REPORT DATE : 31-MAR-1997 REPORT NUMBER : D97-3141

SAMPLE SUBMITTED BY : Schlumberger Well Service
ATTENTION : Mr. Keith Drake
PROJECT : Wash Bay Sump Sludge

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Cadmium	Chromium	Chromium	Mercury	Mercury
BATCH NO.	16497	16465	16497	HG-3424	HG-3564
LCS LOT NO.	AC005-16F,G	---	AC005-16F,G	AB300-58	AB300-58
PREP METHOD	EPA 1311/3015	EPA 1311/3015	EPA 1311/3015	EPA 1311/7470	EPA 1311/7470
PREPARED BY	CEL	CEL	CEL	CEL	CEL
ANALYSIS METHOD	EPA 6010A	EPA 6010A	EPA 6010A	EPA 7470	EPA 7470
ANALYZED BY	GGD	GGD	GGD	CGJ	AH
UNITS	mg/L	mg/L	mg/L	mg/L	mg/L
METHOD BLANK	< 0.0200	< 0.0200	< 0.0200	< 0.00100	< 0.00100
SPIKE LEVEL	0.500	1.00	1.00	0.00100	0.00100
SPK REC LIMITS	80.0 - 120	80.0 - 120	80.0 - 120	80.0 - 120	80.0 - 120
SPK RPD LIMITS	20.0	20.0	20.0	20.0	20.0
MS RESULT	0.454	1.03	0.905	0.00104	0.00104
MS RECOVERY %	90.8	96.7	90.5	104	104
MSD RESULT	0.499	1.03	1.00	0.00105	0.00107
MSD RECOVERY %	99.8	96.7	100	105	107
MS/MSD RPD %	9.44	0.00	9.97	0.96	2.84
BS RESULT	NA	NA	NA	NA	NA
BS RECOVERY %	NA	NA	NA	NA	NA
BSD RESULT	NA	NA	NA	NA	NA
BSD RECOVERY %	NA	NA	NA	NA	NA
BS/BSD RPD %	NA	NA	NA	NA	NA
DUP RPD LIMITS	---	20.0	---	---	---
DUPLICATE RPD %	NC	0.63	NC	NC	NC
LCS LEVEL	0.500	1.00	1.00	0.00100	0.00100
LCS REC LIMITS	80.0 - 120	80.0 - 120	80.0 - 120	80.0 - 120	80.0 - 120
LCS RESULT	0.505	1.00	1.00	0.00106	0.00106
LCS RECOVERY %	101	100	100	106	106
SPIKE SAMPLE ID	3141-2	3046-1	3141-2	3087-1	3457-1
SAMPLE VALUE	< 0.0200	0.0634	< 0.0200	< 0.00100	< 0.00100
DUP SAMPLE ID	3141-2	3046-1	3141-2	3087-1	3457-1
DUP SAMPLE VAL/1	---	0.0638	---	---	---
DUP SAMPLE VAL/2	---	0.0634	---	---	---

NA Not applicable
NC Not calculable



Inchcape Testing Services
Environmental Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 972-238-5591
Fax 972-238-5592

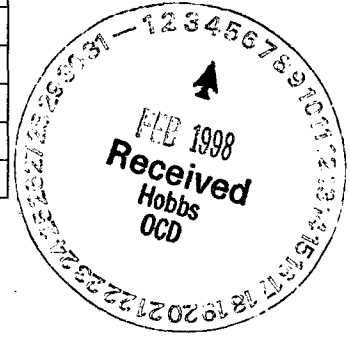
REPORT DATE : 31-MAR-1997 REPORT NUMBER : D97-3141

SAMPLE SUBMITTED BY : Schlumberger Well Service
ATTENTION : Mr. Keith Drake
PROJECT : Wash Bay Sump Sludge

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Lead	Lead	Selenium	Selenium
BATCH NO.	16497	16465	16497	16465
LCS LOT NO.	AC005-16F,G	---	AC005-16F,G	---
PREP METHOD	EPA 1311/3015	EPA 1311/3015	EPA 1311/3015	EPA 1311/3015
PREPARED BY	CEL	CEL	CEL	CEL
ANALYSIS METHOD	EPA 6010A	EPA 6010A	EPA 6010A	EPA 6010A
ANALYZED BY	GGD	GGD	GGD	GGD
UNITS	mg/L	mg/L	mg/L	mg/L
METHOD BLANK	< 0.200	< 0.200	< 0.200	< 0.200
SPIKE LEVEL	1.00	1.00	1.00	1.00
SPK REC LIMITS	80.0 - 120	80.0 - 120	60.0 - 140	60.0 - 140
SPK RPD LIMITS	20.0	20.0	20.0	20.0
MS RESULT	0.911	0.974	1.05	1.06
MS RECOVERY %	91.1	97.4	105	106
MSD RESULT	1.00	0.973	1.16	1.06
MSD RECOVERY %	99.5	97.3	116	106
MS/MSD RPD %	8.81	0.10	9.95	0.00
BS RESULT	NA	NA	NA	NA
BS RECOVERY %	NA	NA	NA	NA
BSD RESULT	NA	NA	NA	NA
BSD RECOVERY %	NA	NA	NA	NA
BS/BSD RPD %	NA	NA	NA	NA
DUP RPD LIMITS	---	---	---	---
DUPLICATE RPD %	NC	NC	NC	NC
LCS LEVEL	1.00	1.00	1.00	1.00
LCS REC LIMITS	80.0 - 120	80.0 - 120	60.0 - 140	60.0 - 140
LCS RESULT	0.982	1.02	1.17	1.07
LCS RECOVERY %	98.2	102	117	107
SPIKE SAMPLE ID	3141-2	3046-1	3141-2	3046-1
SAMPLE VALUE	< 0.200	< 0.200	< 0.200	< 0.200
DUP SAMPLE ID	3141-2	3046-1	3141-2	3046-1
DUP SAMPLE VAL/1	---	---	---	---
DUP SAMPLE VAL/2	---	---	---	---

NA Not applicable
NC Not calculable



Inchcape Testing Services
Environmental Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 972-238-5591
Fax 972-238-5592

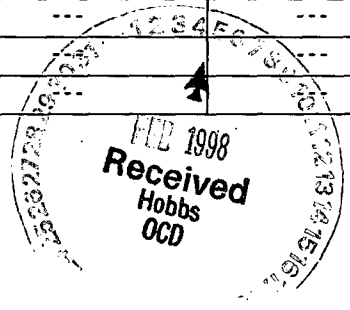
REPORT DATE : 31-MAR-1997 REPORT NUMBER : D97-3141

SAMPLE SUBMITTED BY : Schlumberger Well Service
ATTENTION : Mr. Keith Drake
PROJECT : Wash Bay Sump Sludge

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Hexachlorobenzene	Pentachlorophenol	Benzene	Carbon tetrachloride	Chlorobenzene
BATCH NO.	AC051-83	AC051-83	032182401B	032182401B	032182401B
LCS LOT NO.	AB988-59	AB988-59	AB598-58-2	AB598-58-2	AB598-58-2
PREP METHOD	EPA 1311/3520B	EPA 1311/3520B	EPA 1311/5030	EPA 1311/5030	EPA 1311/5030
PREPARED BY	HCS	HCS	DTA	DTA	DTA
ANALYSIS METHOD	EPA 1311/8270B	EPA 1311/8270B	EPA 1311/8240	EPA 1311/8240	EPA 1311/8240
ANALYZED BY	WWY	WWY	DTA	DTA	DTA
UNITS	mg/L	mg/L	mg/L	mg/L	mg/L
METHOD BLANK	< 0.100	< 0.500	< 0.100	< 0.100	< 0.100
SPIKE LEVEL	1.00	1.00	1.00	1.00	1.00
SPK REC LIMITS	10.0 - 152	14.0 - 176	65.0 - 135	70.0 - 140	37.0 - 160
SPK RPD LIMITS	25.0	49.0	35.0	26.0	32.0
MS RESULT	1.03	0.703	1.00	1.00	1.00
MS RECOVERY %	103	70.3	100	100	100
MSD RESULT	1.06	0.665	1.00	1.00	1.00
MSD RECOVERY %	106	66.5	100	100	100
MS/MSD RPD %	2.87	5.56	0.00	0.00	0.00
BS RESULT	1.06	0.690	1.00	1.00	1.00
BS RECOVERY %	106	69.0	100	100	100
BSD RESULT	1.08	0.663	1.00	1.00	1.10
BSD RECOVERY %	108	66.3	100	100	110
BS/BSD RPD %	1.87	3.99	0.00	0.00	9.52
DUP RPD LIMITS	---	---	---	---	---
DUPLICATE RPD %	NA	NA	NA	NA	NA
LCS LEVEL	1.00	1.00	1.00	1.00	1.00
LCS REC LIMITS	10.0 - 152	14.0 - 176	65.0 - 135	70.0 - 140	37.0 - 160
LCS RESULT	SEE_BS	SEE_BS	SEE_BS	SEE_BS	SEE_BS
LCS RECOVERY %	SEE_BS	SEE_BS	SEE_BS	SEE_BS	SEE_BS
SPIKE SAMPLE ID	3111-1	3111-1	3111-1	3111-1	3111-1
SAMPLE VALUE	< 0.100	< 0.500	< 0.100	< 0.100	< 0.100
DUP SAMPLE ID	---	---	---	---	---
DUP SAMPLE VAL/1	---	---	---	---	---
DUP SAMPLE VAL/2	---	---	---	---	---

SEE_BS LCS and LCS Duplicate reported as BS and BSD.
NA Not applicable



ITS Environmental Laboratories 1089 East Collins Blvd., #100 Richardson, TX 75081 (972) 238-5591

CHAIN OF CUSTODY RECORD

Report to:
Company: Schlumberger
Address: PO Box 1770
Hobbs NM 88240
Contact: Keith Drake
Phone: (505) 393-4107
Fax: (505) 392-3825

Invoice to
Company: SAME
Address:
Contact: SAME
Phone: SAME
PO/SO #:

ANALYSIS REQUESTED

TCLP w/ Pesticides w/ metals
TPH

Received FEB 1998 Hobbs OCD

Lab use only
Due Date:

Temp. of coolers when received (C°): 1 2 3 4 5 6

Custody Seal N / Y
Intact N / X

Screened For Radioactivity X

Sampler's Name: Keith Drake
Sampler's Signature: Keith Drake

Proj. No.
Project Name: WASH BAY SUMP SLUDGE
No./Type of Containers[2]: 4 JARS

Matrix[1]	Date	Time	Comp	Grab	Identifying Marks of Sample(s)	VOA	A/G 1 Lt.	250 ml	P/O	Lab Sample ID (Lab Use Only)
WW SO	3-17	1600		X	CABELS ON JARS					3141 - 1
WW SO	3-17	1600		X	" Testing Sump					
WW SO	3-17	1600		X	" Wireline Sump					2
WW SO	3-17	1600		X	"					

Turn around time: X Priority 1 or Standard ☐ Priority 2 or 50% ☐ Priority 3 or 100% ☐ Priority 4 ERS *

* BTEX (602/8020), TPH (418.1 or 8015), VOLATILES (624/8240), IGNITABILITY, TOTAL LEAD (6010)

Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)	Date:	Time:
Keith Drake	3-17	3-N-97			
Keith Drake	3-17	3-14-97			
Keith Drake	3-17	3-14-97	Samuel Meyer	3/17/97	10:47

Remarks

Client's delivery of samples constitutes acceptance of Inchcape/ITS-Dallas terms and conditions contained in the Price Schedule.

[1] Matrix: WW - Wastewater; W - Water; S - Soil; SD - Solid; L - Liquid; A - Air Bag; C - Charcoal tube; SL - Sludge; O - Oil
[2] Container: VOA - 40 ml vial; A/G - Amber / Or Glass 1 Liter; 250 ml - Glass wide mouth; P/O - Plastic or other

Inchcape cannot accept verbal changes. Please Fax written changes to 972-238-5592

OFFICE USE ONLY

ORIGINAL

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to approp
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Verbal Approval Received: Yes ☐ No ☐	4. Generator Weatherford Enterra
	5. Originating Site Odessa Facility
2. Management Facility Destination Controled Recovery, Inc.	6. Transporter Fluid Transport
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 8870 W Loop 338	Odessa Texas

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Weatherford Enterra Odessa facility. The waste was generated by hydroblasting oilfield pipe. I have included a Texas waste code, a certificate of waste and a chain of custody. This material has been approved in the past.

JAN 98
Received
Hobbs
OCD

01-013

Estimated Volume 120 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo Title: Office Manager DATE: 01/13/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

Sent 1 bbls 1/26/98

(This space for State Use)

APPROVED BY: _____ TITLE: Field Rep DATE: 1/24/98

APPROVED BY: Martyne J Kelly TITLE: Env. Geologist DATE: 1/26/98

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

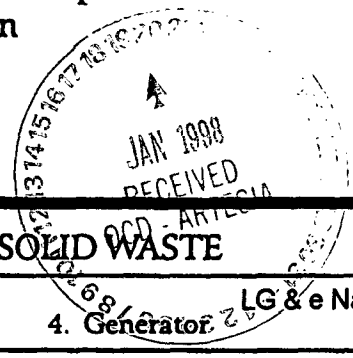
SENT ARTESIA 1/16/98

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division

2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to appropr
District O



REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator LG & e Natural
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Carlsbad compressor
2. Management Facility Destination Controled Recovery, Inc.	6. Transporter Rowland
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) Carlsbad Compressor Station Lot 9 6-21S-28E	New Mexioc Eddy County

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

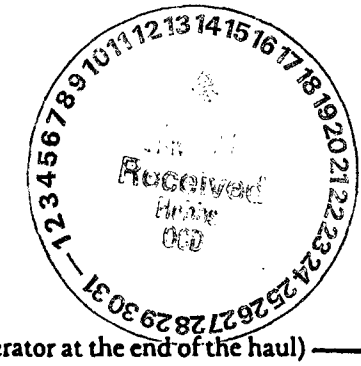
B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the L G & E Natural. The waste was generated by rain water caught from the environmental bases on compressor. I have inlcuded a certificat of waste and a chain of custody.

01-006



8/12/21 Sent to Hobbs

Estimated Volume 100 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Office Manager DATE: 01/07/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: Wayne Price TITLE: ENVR Engr Mgr/GS DATE: 1/16/98

APPROVED BY: Martyne J Kelly TITLE: Env. Geologist DATE: 1/26/98

1998
Received
Hobbs
OCD

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR L G & E Natural

ADDRESS 921 West Sanger Hobbs, New Mexico

GENERATING SITE North East Carlsbad Compressor Station

COUNTY Eddy STATE New Mexico

TYPE OF WASTE Rain water caught from environmental bases of compressor

ESTIMATED VOLUME 100 bbls

GENERATING PROCESS equipment skids caught rain water and wash down water

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY Rowland Trucking

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT _____
SIGNATURE

NAME Ed Sloman
PRINTED

ADDRESS 921 Wesst Sanger Hobbs, New Mexico

DATE 01/07/98

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
Attention: Allen Hodge
P. O. Box 1916
Hobbs, NM 88241

October 29, 1997
Receiving Date: 10/16/97
Sample Type: Water
Project No: #1035
Project Location: Berton Flats

Extraction Date: 10/21/97
Analysis Date: 10/27/97
Sampling Date: 10/16/97
Sample Condition: I & C
Sample Received by: BL
Project Name: Non-Exempt Rain/ Wash Water Tank

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T83496 Rain/Wash Water Tank	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	69	*147	31	86
1,4-Dichlorobenzene	7.5	0.05	ND	82	1	43	103
o-Cresol	200.0	0.05	ND	86	5	46	108
m,p-Cresol	200.0	0.05	ND	79	4	46	99
Hexachloroethane	3.0	0.05	ND	67	4	54	84
Nitrobenzene	2.0	0.05	ND	71	1	74	89
Hexachlorobutadiene	0.5	0.05	ND	70	2	57	88
2,4,6-Trichlorophenol	2.0	0.05	ND	90	5	43	113
2,4,5-Trichlorophenol	400.0	0.05	ND	78	0	43	98
2,4-Dinitrotoluene	0.13	0.05	ND	82	4	51	103
2,4-D	10.0	0.05	ND	75	7	18	94
Hexachlorobenzene	0.13	0.05	ND	81	0	63	101
2,4,5-TP	1.0	0.05	ND	73	13	21	91
Pentachlorophenol	100.0	0.05	ND	91	4	50	114

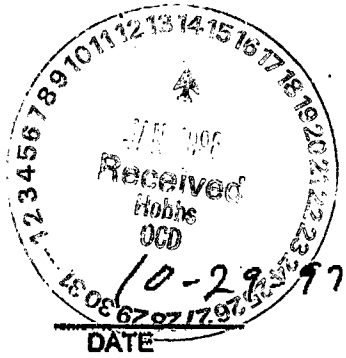
Surrogates	% RECOVERY
2-Fluorophenol	44
Phenol-d6	39
Nitrobenzene-d5	64
2-Fluorobiphenyl	76
2,4,6-Tribromophenol	84
Terphenyl-d14	111

ND - Not Detected

***NOTE; RPD out of limits.**

Methods: EPA SW 846-1311, 8270, 8080.
CHEMIST: RP/HW

Director, Dr. Blair Leftwich



DATE

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
Attention: Allen Hodge
P. O. Box 1818
Hobbs, NM 88241

October 29, 1997
Receiving Date: 10/16/97
Sample Type: Water
Project No: #1035
Project Location: Berton Flats

Extraction Date: 10/16/97
Analysis Date: 10/16/97
Sampling Date: 10/16/97
Sample Condition: I & C
Sample Received by: BL
Project Name: Non-Exempt Rain/ Wash Water Tank

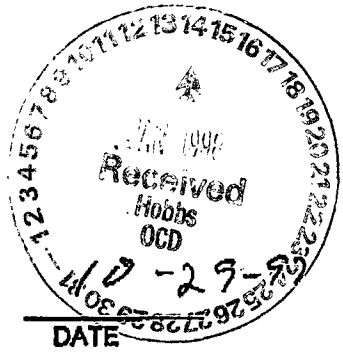
TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T83496 Rain/Wash Water Tank	QC	RPD	%EA	%IA
Vinyl chloride	0.20	0.05	ND	0.107	1	89	107
1,1-Dichloroethene	0.70	0.05	ND	0.101	2	96	101
Methyl Ethyl Ketone	200.0	0.5	ND	0.087	8	95	87
Chloroform	6.00	0.05	ND	0.102	1	100	102
1,2-Dichloroethane	0.50	0.05	ND	0.101	2	102	101
Benzene	0.50	0.05	ND	0.102	1	100	102
Carbon Tetrachloride	0.50	0.05	ND	0.119	2	100	119
Trichloroethene	0.50	0.05	ND	0.098	2	104	98
Tetrachloroethene	0.70	0.05	ND	0.100	2	106	100
Chlorobenzene	100.00	0.05	ND	0.105	1	103	105
1,4-Dichlorobenzene	7.50	0.05	ND	0.102	1	100	102

SURROGATES	% Recovery
Dibromofluoromethane	100
Toluene-d8	97
4-Bromofluorobenzene	96

ND = Not Detected

METHODS: EPA SW 846-1311, 8260.
CHEMIST: RW

Director, Dr. Blair Leftwich



DATE

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
Attention: Allen Hodge
P. O. Box 1816
Hobbs, NM 88241

October 29, 1997
Receiving Date: 10/16/97
Sample Type: Water
Project No: #1035
Project Location: Berton Flats

Extraction Date: 10/21/97
Analysis Date: 10/21/97
Sampling Date: 10/16/97
Sample Condition: I & C
Sample Received by: BL
Proj. Name: Non-Exempt Rain/ Wash Water Tank

TCLP METALS (mg/L)

		As	Se	Cd	Cr	Pb	Ag	Ba	Hg
	EPA LIMIT =	5.0	1.0	1.0	5.0	5.0	5.0	100.0	0.20
T83496	Rain/Wash Water Tank	<0.10	<0.10	<0.02	<0.05	<0.10	<0.01	<0.20	<0.01
QC	Quality Control	5.1	5.0	4.9	4.9	5.0	0.98	5.1	0.0475
	Reporting Limit	0.10	0.10	0.02	0.05	0.10	0.01	0.20	0.01
	RPD	14	1	1	0	1	5	1	2
	% Extraction Accuracy	*(LCS) 85	109	96	86	97	97	109	113
	% Instrument Accuracy	102	100	98	98	99	98	102	95

Received Hobbs NM 88240

*NOTE: LCS used for Extraction Accuracy due to matrix effects.

CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba: RR Hg: HC
METHODS: EPA SW 846-1311, 6010B, 7470.
TCLP METALS SPIKE: 2.0 mg/L As, Se, Cd, Cr, Pb, Ba; 1.0 mg/L Ag; 0.05 mg/L Hg.
TCLP METALS QC: 5.0 mg/L As, Se, Cd, Cr, Pb, Ba; 1.0 mg/L Ag; 0.05 mg/L Hg.

Director, Dr. Blair Leftwich

10-29-97
Date

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
Attention: Allen Hodge
P. O. Box 1816
Hobbs, NM 88241

October 29, 1997
Receiving Date: 10/16/97
Sample Type: Water
Project No: #1035
Project Location: Berton Flats

Extraction Date: 10/27/97
Analysis Date: 10/27/97
Sampling Date: 10/16/97
Sample Condition: I & C
Sample Received by: BL
Proj. Name: Non-Exempt Rain/ Wash Water Tank

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY (mm/yr)	pH (s.u.)	FLASHPOINT (^{o}F)
	EPA LIMIT =	—	500	250	>6.5 mm/yr	<2 >12.5	>140^{o}F
T83496	Rain/Wash Water Tank	Non-reactive	<10	<2.5	Non-corrosive 0.85	6.8	>150
QC	Quality Control	—	—	—	—	7.0	—
RPD		0	0	0	0	0	0
% Extraction Accuracy		—	—	—	—	—	—
% Instrument Accuracy		—	—	—	—	100	—

METHODS: EPA SW 846-2.1.3, 2.1.2, 1010.
CHEMIST: JG

Director, Dr. Blair Leftwich

10-25-97
DATE

ID:
JAN 06 '98 8:18 No.001 P.06

3496

Page ____ of ____

TraceAnalysis, Inc.

6701 Aberdeen Avenue, Ste. 9 Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

LAB Order ID # 288

Company Name: WESTERN ENVIRONMENTAL CONSULTANTS (WEC) Phone #: 505-392-5021
Address: P.O. BOX 1816 Hobbs, NM 88241 Fax #: 505-392-9376
Contact Person: ALLEN Hodge / LG&E NATURAL (NE. CARLSBAD COMPRESSOR STA.)
Invoice to: (If different from above)
Project #: #1035 Project Name: NON-EXEMPT RAIN/WASH WATER TANK
Project Location: BERTON FLATS Sampler Signature:

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME
83496	RAIN/WASH WATER TANK	2	40ml	X						X		10-16-97	3:15
		1	QT	X						X		10-16-97	3:15

ANALYSIS REQUEST (Circle or Specify Method No.)

MTBE 8020/602	BTEX 8020/602	TPH	PAH 8270	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	GC/MS Vol. 8240/8260/624	GC/MS Semi. Vol. 8270/625	PCB's 8080/608	Pest. 8080/608	BOD, TSS, PH			Turn Around Time if different from standard	Hold
					X	X	X										
					X	X	X										

1-10 PCB's
1-10 H.S.L.

Received by OCD: 10/30/97 8:19:01 AM

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
[signature]	10-16-97	3:15			
Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received at Laboratory by: [signature]	10-16-97	3:15 pm

LAB USE ONLY
Intact Y / N
Headspace Y / N
Temp 5.1 °
Log-in Review

REMARKS:
10-30
289 AQ

Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C.O.C.

Carrier #

JAN 06 '98 8:19 No.001 P.07

ID:

P. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
JAN 21 1998
Environmental Bureau
Oil Conservation Division

Form C-1
Originated 8/8/
Submit Origi
Plus 1 Co
to appropri
District Off

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator BJ Services
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Hobbs Yard
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Unknown
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State NM
7. Location of Material (Street Address or ULSTR) 2708 W County Road Hobbs	NM

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the BJ Services Hobbs yard. The waste was generated by the truck washing. I have inlcuded a certificate of waste and a chain of custody. This material has been approved in the past.

JAN 1998 Received Hobbs OCD

Estimated Volume 10 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Office Manager DATE: 12/02/97

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Envr Engr DATE: 1/15/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 1/21/98

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR B.J. SERVICES

ADDRESS 2708 W. County Rd.

GENERATING SITE WASH BAY

COUNTY Lea STATE NM.

TYPE OF WASTE WASH BAY

ESTIMATED VOLUME 10 Cu. yds ±

GENERATING PROCESS

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY Sonny's

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT Dan V. Miller
SIGNATURE

NAME DAN V. Miller
PRINTED

ADDRESS 2708 W. County Road

Hobbs NM

DATE 12-2-97

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

February 12, 1997

Mr. Wesley Root
R & B Environmental
P.O. Box 1022
Hobbs, NM 88240

The following report contains analytical results for samples received at Southern Petroleum Laboratories (SPL) on January 29, 1997. The samples were assigned to Certificate of Analysis No. 9701B55 and analyzed for all parameters as listed on the chain of custody.

There were no analytical problems encountered with this group of samples and all quality control data was within acceptance limits.

If you have any questions or comments pertaining to this data report, please do not hesitate to contact me. Please reference the above Certificate of Analysis No. during any inquiries.

Again, SPL is pleased to be of service to you. We anticipate working with you in fulfilling all your current and future analytical needs.

Southern Petroleum Laboratories

Brett VanDelinder
Project Manager

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

SOUTHERN PETROLEUM LABORATORIES, INC.

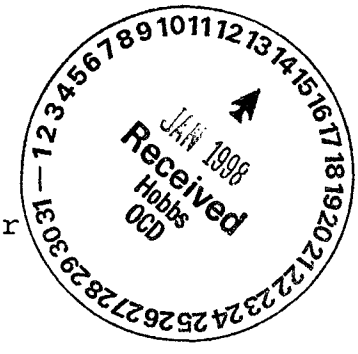
Certificate of Analysis Number: 97-01-B55

Approved for Release by:

Brett VanDelinder, Project Manager — Date: 2-12-97

Greg Grandits
Laboratory Director

Idelis Williams
Quality Assurance Officer



The attached analytical data package may not be reproduced except in full without the express written approval of this laboratory.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

DATE: 02/12/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: SLUDGE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	DETECTION LIMIT	UNITS
Silver, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.01	mg/L
Arsenic, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.2	mg/L
Barium, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	1	mg/L
Cadmium, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.01	mg/L
Chromium, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.02	mg/L
Cyanide-Reactive METHOD 7.3.3.1 *** Analyzed by: IP Date: 02/05/97	ND	10	mg/Kg

ND - Not detected.

Notes: *Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA
**Ref: Standard Methods for Examination of Water & Wastewater, 18th ed.
***Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

DATE: 02/12/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: SLUDGE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	DETECTION LIMIT	UNITS
Flash and Fire Point-Cleveland Open Cup Method ASTM D92-85 Analyzed by: TB Date: 02/04/97	>210		°F
Mercury, TCLP Leachate METHOD 7470 *** Analyzed by: PC Date: 02/10/97	ND	0.0004	mg/L
Acid Digestion of Leachate, ICP METHOD 3010A *** Analyzed by: MM Date: 01/31/97	01/31/97		
Lead, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.1	mg/L
Soil pH Measured in Water METHOD 9045C *** Analyzed by: LAR Date: 01/30/97	5.64		pH units
TCLP Leachate extraction METHOD 1311 *** Analyzed by: WLR Date: 01/30/97	01/30/97		

ND - Not detected.

Notes: *Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA
**Ref: Standard Methods for Examination of Water & Wastewater, 18th ed.
***Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

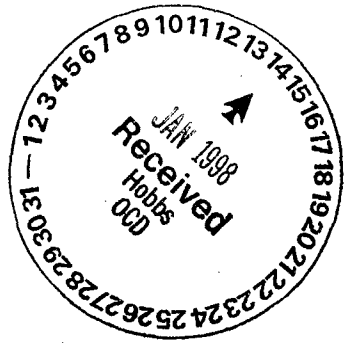
DATE: 02/12/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: SLUDGE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	DETECTION LIMIT	UNITS
TCLP Leachate extraction METHOD 1311 *** Analyzed by: WLR Date: 01/30/97	01/30/97		
Zero Headspace extraction METHOD 1311 Analyzed by: WLR Date: 01/30/97	01/30/97		
Selenium, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.2	mg/L
Sulfide-Reactive METHOD 7.3.4.2 *** Analyzed by: IP Date: 02/05/97	ND	100	mg/Kg



ND - Not detected.

Notes: *Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA
**Ref: Standard Methods for Examination of Water & Wastewater, 18th ed.
***Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

HOUSTON LABORATORY
6880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

02/12/9

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: LEACHATE
DATE SAMPLED: 01/24/97 14:25:0(
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS	RL ▲
ortho-Cresol	ND	50	ug/L	200000
meta, para-Cresols	ND	100	ug/L	200000
1,4-Dichlorobenzene	ND	50	ug/L	7500
2,4-Dinitrotoluene	ND	50	ug/L	130
Hexachlorobenzene	ND	50	ug/L	130
Hexachlorobutadiene	ND	50	ug/L	500
Hexachloroethane	ND	50	ug/L	3000
Nitrobenzene	ND	50	ug/L	2000
Pentachlorophenol	ND	250	ug/L	100000
Pyridine	ND	50	ug/L	5000
2,4,5-Trichlorophenol	ND	100	ug/L	400000
2,4,6-Trichlorophenol	ND	50	ug/L	2000

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
Nitrobenzene-d5	50 ug/L	106	35	114
2-Fluorobiphenyl	50 ug/L	94	43	116
Terphenyl-d14	50 ug/L	83	33	141
Phenol-d5	75 ug/L	102	10	110
2-Fluorophenol	75 ug/L	88	21	110
2,4,6-Tribromophenol	75 ug/L	85	10	123

ANALYZED BY: PC DATE/TIME: 02/04/97 17:45:00
LEACHATE EXTRACTION BY: SW DATE/TIME: 01/31/97 13:00:00
METHOD: 1311/8270, TCLP Semivolatiles
NOTES: * - Practical Quantitation Limit ND - Not Detected
NA - Not Analyzed
▲ - Regulatory Limit. Reference Federal Register 55 11862 (3/29/90), RCRA Toxicity Characteristic Final Rule

COMMENTS:

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

02/12/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

.19 ppm ok

PROJECT NO: B01501
MATRIX: LEACHATE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ppm

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS	RL ▲
Benzene	190	50	ug/L	500
2-Butanone	ND	200	ug/L	200000
Carbon Tetrachloride	ND	50	ug/L	500
Chlorobenzene	ND	50	ug/L	100000
Chloroform	ND	50	ug/L	6000
1,2-Dichloroethane	ND	50	ug/L	500
1,1-Dichloroethene	ND	50	ug/L	700
Tetrachloroethene	ND	50	ug/L	700
Trichloroethene	ND	50	ug/L	500
Vinyl Chloride	ND	100	ug/L	200

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
4-Bromofluorobenzene	50 ug/L	100	86	115
1,2-Dichloroethane-d4	50 ug/L	96	76	114
Toluene-d8	50 ug/L	105	88	110

ANALYZED BY: GT DATE/TIME: 01/31/97 14:46:00
LEACHATE PREP(ZHE) BY: WLR DATE/TIME: 01/30/97
METHOD: 1311/8240, TCLP Volatiles
NOTES: * - Practical Quantitation Limit ND - Not Detected
NA - Not Analyzed
▲ - Regulatory Limit. Reference Federal Register 55, 11862 (3/29/90), RCRA Toxicity Characteristic Final Rule.

COMMENTS:

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

QUALITY CONTROL

DOCUMENTATION

SPL Labs

RECOVERY REPORT

Client Name:
Sample Matrix: OTHER
Lab Smp Id: 9701915-01AMS-TCLPV/10X
Level: LOW
Data Type: MS DATA
SpikeList File: 9701915-01A
Method File: /chem/m.i/m970127.b/m8240bwq.m
Misc Info: M027W1/M027S01/M027CW2

Client SDG: m970127
Fraction: VOA
Operator: GT
SampleType: METHSPIKE
Quant Type: ISTD

	SPIKE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
2	Vinyl Chloride	500	570	114.89	50-150
7	1,1-Dichloroethene	500	550	109.70	50-150
14	2-Butanone	500	400	80.00	30-150
17	Chloroform	500	530	106.64	50-150
20	1,2-Dichloroethane	500	500	100.91	50-150
21	Benzene	500	560	111.11	50-150
22	Carbon Tetrachlori	500	500	99.75	50-150
25	Trichloroethene	500	580	116.70	50-150
36	Tetrachloroethene	500	520	104.88	50-150
38	Chlorobenzene	500	510	102.70	50-150

	SURROGATE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
S 18	1,2-Dichloroethane	50	53	105.57	76-114
S 31	Toluene-d8	50	52	103.52	88-110
S 46	Bromofluorobenzene	50	49	98.27	86-115

SPL Labs

RECOVERY REPORT

Client Name:
Sample Matrix: LIQUID
Lab Smp Id: LCS
Level: LOW
Data Type: MS DATA
SpikeList File: 8240water.spk
Method File: /chem/m.i/m970127.b/m8240bwq.m
Misc Info: M027W1//M027CW2

Client SDG: m970127
Fraction: VOA

Operator: GT
SampleType: METHSPIKE
Quant Type: ISTD

SPIKE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
7 1,1-Dichloroethene	50	53	105.89	61-145
25 Trichloroethene	50	54	108.09	71-120
21 Benzene	50	55	109.40	76-127
32 Toluene	50	53	106.18	76-125
38 Chlorobenzene	50	49	98.07	75-130

SURROGATE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
$ 18 1,2-Dichloroethane	50	52	103.31	76-114
$ 31 Toluene-d8	50	53	105.46	88-110
$ 46 Bromofluorobenzene	50	49	97.66	86-115

HOUSTON LABORATORY
6880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

SPL Blank QC Report

Matrix: Aqueous
Sample ID: VBLK
Batch: M970131113701

Reported on: 02/03/97 13:20
Analyzed on: 01/31/97 13:32
Analyst: GT

METHOD 8240 M031B01

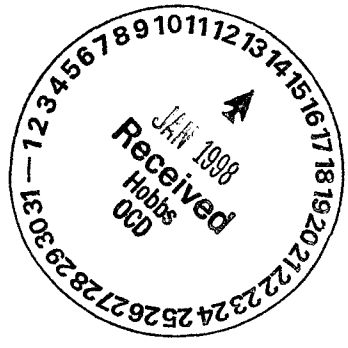
Compound	Result	Detection Limit	Units
Vinyl Chloride	ND	10	ug/L
1,1-Dichloroethene	ND	5	ug/L
2-Butanone	ND	20	ug/L
Chloroform	ND	5	ug/L
1,2-Dichloroethane	ND	5	ug/L
Benzene	ND	5	ug/L
Carbon Tetrachloride	ND	5	ug/L
Trichloroethene	ND	5	ug/L
Tetrachloroethene	ND	5	ug/L
Chlorobenzene	ND	5	ug/L

Surrogate	Result	QC Criteria	Units
1,2-Dichloroethane-d4	104	76-114	% Recovery
Toluene-d8	108	88-110	% Recovery
Bromofluorobenzene	101	86-115	% Recovery

Samples in Batch 9701B55-01

Notes

ND - Not detected.



HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

SPL Blank QC Report

Matrix: Leachate
Sample ID: TCLPB0130
Batch: M970131113701

Reported on: 02/03/97 13:20
Analyzed on: 01/31/97 13:54
Analyst: GT

METHOD 8240

Compound	Result	Detection Limit	Units
Vinyl Chloride	ND	10	ug/L
1,1-Dichloroethene	ND	5	ug/L
2-Butanone	ND	20	ug/L
Chloroform	ND	5	ug/L
1,2-Dichloroethane	ND	5	ug/L
Benzene	ND	5	ug/L
Carbon Tetrachloride	ND	5	ug/L
Trichloroethene	ND	5	ug/L
Tetrachloroethene	ND	5	ug/L
Chlorobenzene	ND	5	ug/L

Surrogate	Result	QC Criteria	Units
1,2-Dichloroethane-d4	99	76-114	% Recovery
Toluene-d8	110	88-110	% Recovery
Bromofluorobenzene	100	86-115	% Recovery

Samples in Batch 9701B55-01

Notes

ND - Not detected.

SPL Houston Labs

RECOVERY REPORT

Client Name:
Sample Matrix: LIQUID
Lab Smp Id: 9612E76-07AMS
Level: LOW
Data Type: MS DATA
SpikeList File: tclp.spk
Method File: /chem/h.i/h970108.b/h8270wQ.m
Misc Info: E003F3/H008S06/H008CC1

Client SDG: h970108
Fraction: SV

Operator: LH
SampleType: BLANK
Quant Type: ISTD

	SPIKE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
17	ortho-Cresol	750	500	66.49	10-120
20	meta,para-Cresol	1500	870	58.32	10-120
12	1,4-Dichlorobenzen	500	380	75.29	20-124
53	2,4-Dinitrotoluene	500	400	79.65	39-139
63	Hexachlorobenzene	500	230	45.89	0-152
35	Hexachlorobutadien	500	500	100.30	24-116
22	Hexachloroethane	500	330	65.37	40-113
24	Nitrobenzene	500	300	59.34	35-180
64	Pentachlorophenol	750	740	98.46	14-176
2	Pyridine	500	180	36.79	0-150
40	2,4,5-Trichlorophe	750	610	81.10	30-140
39	2,4,6-Trichlorophe	750	480	63.96	37-144

	SURROGATE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
$ 23	Nitrobenzene-d5	50	29	58.98	35-114
$ 41	2-Fluorobiphenyl	50	23	46.22	43-116
$ 72	Terphenyl-d14	50	40	80.23	33-141
$ 4	Phenol-d5	75	50	66.21	10-110
$ 3	2-Fluorophenol	75	53	70.78	21-110
$ 61	2,4,6-Tribromophen	75	65	86.15	10-123

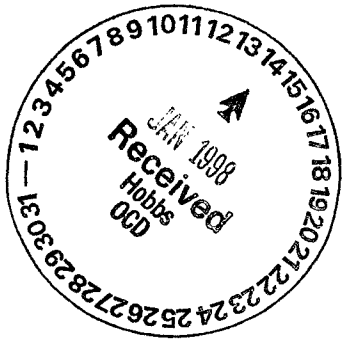
SPL Houston Labs

RECOVERY REPORT

Client Name:
Client SDG: h970106
Sample Matrix: LIQUID
Fraction: SV
Lab Smp Id: LCS
Level: LOW
Operator: LH
Data Type: MS DATA
SampleType: MS
SpikeList File: tclp.spk
Quant Type: ISTD
Method File: /chem/h.i/h970106.b/h8270wQ.m
Misc Info: E003F3/H003B03/H006CC2

	SPIKE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
17	ortho-Cresol	75	54	71.66	10-120
20	meta,para-Cresol	150	100	67.45	10-120
12	1,4-Dichlorobenzen	50	39	77.80	20-124
53	2,4-Dinitrotoluene	50	49	97.49	39-139
63	Hexachlorobenzene	50	19	38.44	0-152
35	Hexachlorobutadien	50	53	105.53	24-116
22	Hexachloroethane	50	36	72.52	40-113
24	Nitrobenzene	50	34	68.08	35-180
64	Pentachlorophenol	75	68	90.24	14-176
2	Pyridine	50	28	57.10	0-150
40	2,4,5-Trichlorophe	75	60	79.42	30-140
39	2,4,6-Trichlorophe	75	56	75.02	37-144

	SURROGATE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
$ 23	Nitrobenzene-d5	50	34	68.20	35-114
$ 41	2-Fluorobiphenyl	50	32	64.68	43-116
$ 72	Terphenyl-d14	50	47	94.05	33-141
$ 4	Phenol-d5	75	54	72.27	10-110
$ 3	2-Fluorophenol	75	51	68.58	21-110
$ 61	2,4,6-Tribromophen	75	66	88.77	10-123



HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

SPL Blank QC Report

Matrix: Aqueous
Sample ID: BLANK
Batch: E970131042249

Reported on: 02/07/97 14:2
Analyzed on: 02/01/97 16:3
Analyst: PC

METHOD 8270 BLANK J031B03

Compound	Result	Detection Limit	Units
Pyridine	ND	5	ug/L
ortho-Cresol	ND	5	ug/L
meta,para-Cresol	ND	10	ug/L
Hexachloroethane	ND	5	ug/L
Nitrobenzene	ND	5	ug/L
Hexachlorobutadiene	ND	5	ug/L
2,4,6-Trichlorophenol	ND	5	ug/L
2,4,5-Trichlorophenol	ND	10	ug/L
2,4-Dinitrotoluene	ND	5	ug/L
Hexachlorobenzene	ND	5	ug/L
Pentachlorophenol	ND	25	ug/L
1,4-Dichlorobenzene	ND	5	ug/L

Surrogate	Result	QC Criteria	Units
2-Fluorobiphenyl	91	43-116	% Recovery
2-Fluorophenol	64	21-110	% Recovery
Nitrobenzene-d5	88	35-114	% Recovery
Phenol-d5	43	10-110	% Recovery
Terphenyl-d14	74	33-141	% Recovery
2,4,6-Tribromophenol	83	10-123	% Recovery

Samples in Batch 9701B55-01

Notes

ND - Not detected.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

SPL Blank QC Report

Matrix: Leachate
Sample ID: BLANK
Batch: E970131042249

Reported on: 02/07/97 14:2
Analyzed on: 02/01/97 17:4
Analyst: PC

METHOD 8270

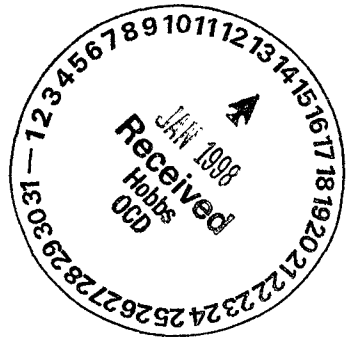
Compound	Result	Detection Limit	Units
Pyridine	ND	5	ug/L
ortho-Cresol	ND	5	ug/L
meta,para-Cresol	ND	10	ug/L
Hexachloroethane	ND	5	ug/L
Nitrobenzene	ND	5	ug/L
Hexachlorobutadiene	ND	5	ug/L
2,4,6-Trichlorophenol	ND	5	ug/L
2,4,5-Trichlorophenol	ND	10	ug/L
2,4-Dinitrotoluene	ND	5	ug/L
Hexachlorobenzene	ND	5	ug/L
Pentachlorophenol	ND	25	ug/L
1,4-Dichlorobenzene	ND	5	ug/L

Surrogate	Result	QC Criteria	Units
2-Fluorobiphenyl	84	43-116	% Recovery
2-Fluorophenol	56	21-110	% Recovery
Nitrobenzene-d5	84	35-114	% Recovery
Phenol-d5	37	10-110	% Recovery
Terphenyl-d14	72	33-141	% Recovery
2,4,6-Tribromophenol	81	10-123	% Recovery

Samples in Batch 9701B55-01

Notes

ND - Not detected.



ICP Spectroscopy Method 6010 Quality Control Report

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

Matrix: TCLP Leachate - SOIL
EX1 01/30

Units: mg/L

Analyst: JM

Date:020497 Time:1203 File Name: 020497M2

Checked: R 2/6/97

Laboratory Control Sample

Element	Mth. Blank	True Value	Result	% Recovery	Lower Limit	Upper Limit
Silver	ND	2.00	1.984	99	1.60	2.40
Arsenic	ND	4.00	3.902	98	3.20	4.80
Barium	ND	2.00	2.057	103	1.60	2.40
Beryllium						
Cadmium	ND	2.00	1.814	91	1.60	2.40
Cobalt						
Chromium	ND	2.00	1.918	96	1.60	2.40
Copper						
Thallium						
Nickel						
Lead	ND	2.00	1.848	92	1.60	2.40
Antimony						
Selenium	ND	4.00	3.936	98	3.20	4.80
Vanadium						
Zinc						

Work Orders in Batch

Work Order	Fractions
97-01-B57	01A-03A
97-01-B55	01A

Matrix Spike - Spike Duplicate Results Work Order Spiked: 97-01-B57 01A

Element	Sample Result	Spike Added	Matrix Spike Result	Matrix Spike Recovery		Matrix Spike Duplicate Result	Matrix Spike Duplicate Recovery		QC Limits % Recovery		Spike RPD %	QC Limits %
Silver	ND	1.0	0.060	6	*	0.072	7	*	80	120	19.4	20.0
Arsenic	ND	2.0	1.735	87		1.797	90		80	120	3.5	20.0
Barium	0.3855	1.0	1.203	82		1.266	88		80	120	7.4	20.0
Beryllium												
Cadmium	ND	1.0	0.817	82		0.847	85		80	120	3.6	20.0
Cobalt												
Chromium	ND	1.0	0.807	81		0.828	83		80	120	2.5	20.0
Copper												
Thallium												
Nickel												
Lead	ND	1.0	0.831	83		0.856	86		80	120	2.9	20.0
Antimony												
Selenium	ND	2.0	1.728	86		1.789	89		80	120	3.5	20.0
Vanadium												
Zinc												

DIG 25/50

* Spike Results Outside Method Limits

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

** SPL QUALITY CONTROL REPORT **

Matrix: Leachate

Reported on: 02/11/97
Analyzed on: 02/10/97
Analyst: PC

This sample was randomly selected for use in the SPL quality control program. Samples chosen are fortified with a known concentration in duplicate. The results are as follows:

Mercury, TCLP Leachate
METHOD 7470 ***

SPL Sample ID Number	Blank Value mg/L	LCS Concentration mg/L	Measured Concentration mg/L	% Recovery	QC Limits Recovery
LCS	ND	2.00	1.79	89.5	80 - 120

-9702264

Samples in batch:

9701B55-01A

COMMENTS:
LCS = SPL ID# 94-452-30-08

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

** SPL QUALITY CONTROL REPORT **

Matrix: Soil

Reported on: 02/05/97
Analyzed on: 02/05/97
Analyst: IP

This sample was randomly selected for use in the SPL quality control program. The results are as follows:

Cyanide-Reactive
METHOD 7.3.3.1 ***

-- DUPLICATE ANALYSIS --

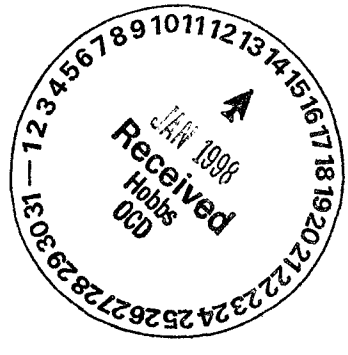
SPL Sample ID	Original Sample Concentration mg/Kg	Duplicate Sample mg/Kg	RPD	RPD Max.
9701B55-01A	ND	ND	0	20

-9702119

Samples in batch:

9701B02-01A 9701B02-02A 9701B55-01A 9702052-01A

COMMENTS:



HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

** SPL QUALITY CONTROL REPORT **

Matrix: Leachate

Reported on: 02/11/97
Analyzed on: 02/10/97
Analyst: PC

This sample was randomly selected for use in the SPL quality control program. Samples chosen are fortified with a known concentration in duplicate. The results are as follows:

Mercury, TCLP Leachate
METHOD 7470 ***

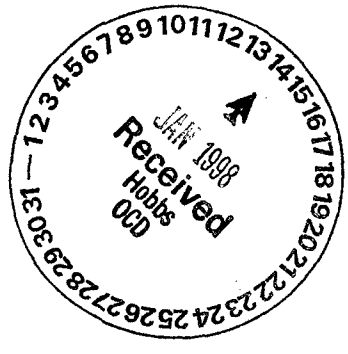
SPL Sample	Method	Sample	Spike	Matrix Spike		Matrix Spike Duplicate		RPD	QC LIMITS (Advisory)	
ID Number	Blank mg/L	Result mg/L	Added mg/L	Result mg/L	Recovery %	Result mg/L	Recovery %	(%)	RPD Max	% REC
9701B55-01A	ND	ND	2.00	1.78	89.0	1.87	93.5	4.9	20	82.3 -125

-9702264

Samples in batch:

9701B55-01A

COMMENTS:
LCS = SPL ID# 94-452-30-08



QA/QC FORM
FLASH POINT by Cleveland Open Cup

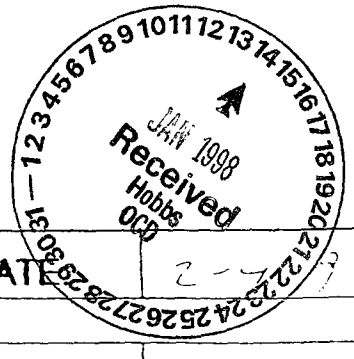
DATE:	2-4-97		
METHOD:	ASTM D 92-85	# OF SAMPLES:	7
UNITS:	DEG. F	ANALYST:	T. Berry

SAMPLE I.D.'s IN SET:

9702048-01A, 9702050-01A, 9702051-01A
9702052-01A, 9701B55-01A, 9701B93-01A
9701B93-02A

REPLICATES

SAMPLE I.D.	RESULT (#1)	DUPLICATE (#2)	DIFFERENCE | #1-#2 |	QC LIMITS
insufficient sample for duplicate analysis				



REVIEWED BY:	Bob Lenard	DATE:	2-7-97
APPROVED BY:		DATE:	

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

** SPL QUALITY CONTROL REPORT **

Matrix: Soil

Reported on: 01/30/97
Analyzed on: 01/30/97
Analyst: LAR

This sample was randomly selected for use in the SPL quality control program. The results are as follows:

Soil pH Measured in Water
METHOD 9045C ***

-- DUPLICATE ANALYSIS --

SPL Sample ID	Original Sample Concentration pH units	Duplicate Sample pH units	RPD	RPD Max.
9701B90-01A	9.96	9.95	0.1	1.1

-9701962

Samples in batch:

9701B55-01A 9701B90-01A 9701B93-01A 9701B93-02A

COMMENTS:

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

** SPL QUALITY CONTROL REPORT **

Matrix: Soil

Reported on: 02/05/97
Analyzed on: 02/05/97
Analyst: IP

This sample was randomly selected for use in the SPL quality control program. The results are as follows:

Sulfide-Reactive
METHOD 7.3.4.2 ***

-- DUPLICATE ANALYSIS --

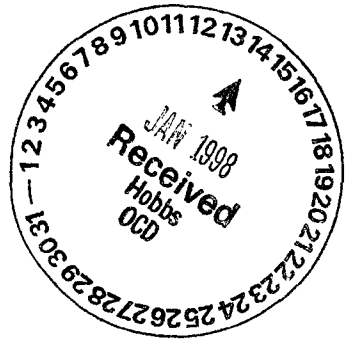
SPL Sample ID	Original Sample Concentration mg/Kg	Duplicate Sample mg/Kg	RPD	RPD Max.
9701B55-01A	ND	ND	0	15

-9702120

Samples in batch:

9701B02-01A 9701B02-02A 9701B55-01A 9702052-01A

COMMENTS:



CHAIN OF CUSTODY

AND

SAMPLE RECEIPT CHECKLIST

Page 1 of 1

Environmental Laboratory
8880 Interchange Drive
Houston, Texas 77054
713/660-0901

Analysis Request and Chain of Custody Record

Project No.	Client/Project Name	Project Location
B01501	R & B Environmental P.O. Box 1022 Hobbs, New Mexico 88240	BJ Services 2708 N. West County Road Hobbs, New Mexico 88241

Field Sample No./ Identification	Date and Time	Grab	Comp	Sample Container (Size/Mat'l)	Sample Type (Liquid, Sludge, Etc.)	Preservative	ANALYSIS REQUESTED	LABORATORY REMARKS
SC-1	1-24-97 14:25		✓	2 8oz	Sludge	Ice	TCLP VOC - 8240 TCLP metals TCLP SVOC - 8270 RCI	

Received JAN 1998 Hobbs OCD

Samplers: (Signature)	Relinquished by: (Signature)	Date / Time	Received by: (Signature)	Date / Time	Intact
F. Wesley Root	F. Wesley Root	1-28-97 17:30		1-29-97 0845	
R & B Environmental	Relinquished by: (Signature)	Date: Time:	Received by: (Signature)	Date: Time:	Intact
Affiliation	Relinquished by: (Signature)	Date: Time:	Received by: (Signature)	Date: Time:	Intact
			Received for laboratory: (Signature)	Date: Time:	Laboratory No
Seal #			Data Results to:		

SAMPLER REMARKS: NORMAL 14 DAY TURN-A-ROUND
Home Phone 505-392-8844

SPL Houston Environmental Laboratory

Sample Login Checklist

Date:	Time:
1-29-97	0945

SPL Sample ID:
97-01-855

			Yes	No
1	Chain-of-Custody (COC) form is present.		✓	
2	COC is properly completed.		✓	
3	If no, Non-Conformance Worksheet has been completed.			
4	Custody seals are present on the shipping container.		✓	
5	If yes, custody seals are intact.		✓	
6	All samples are tagged or labeled.		✓	
7	If no, Non-Conformance Worksheet has been completed.			
8	Sample containers arrived intact		✓	
9	Temperature of samples upon arrival:		4° C	
10	Method of sample delivery to SPL:	SPL Delivery		
		Client Delivery		
		FedEx Delivery (airbill #)	9499799001	
		Other:		
11	Method of sample disposal:	SPL Disposal	✓	
		HOLD		
		Return to Client		

Received JAN 1998 Hobbs OCD

Name:	Date:
	1/29/97

R & B Environmental

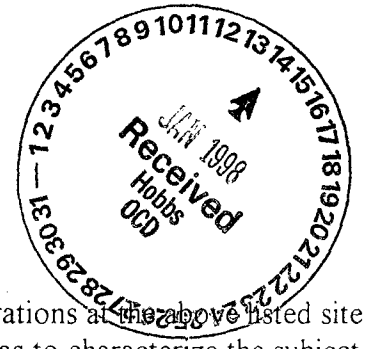
P. O. Box 1022
Hobbs, New Mexico 88240
(505) 392-8844

February 17, 1997

Mr. Dan Miller
B J Services
2708 North West County Road
Hobbs, New Mexico 88240

RE: Waste Characterization
Wash Bay Waste Storage Facility
2708 North West County Road
Hobbs, New Mexico

R & B Project No. B01501



Mr. Miller:

R & B Environmental has completed waste characterization operations at the above listed site as requested by B J Services. The purpose of the sampling event was to characterize the subject waste for waste classification in accordance with RCRA Subtitle C regulations. The scope of work included collecting a composite sample of the subject waste, submitting the sample for laboratory analysis, and documenting the sampling event.

The subject waste consisted of semi-solid sediments contained in underground storage tanks at the waste storage facility located near the northern boundary of B J Services equipment yard. It is our understanding the purpose of the facility is to store waste generated during equipment cleaning operations, typically wash/rinse water, soap, dirt, and any residues that accumulated on the equipment during service in the oilfield.

R & B personnel inspected the facility and sampled the subject waste on January 24, 1997. The facility contained three fiberglass tanks and one sump. Four-point composite samples were obtained from each storage vessel and volumetrically combined to form one composite sample (SC-1).

Prior to collecting samples, the sampling equipment was decontaminated using Liquinox detergent and a distilled water rinse. A soapy water solution and water rinse were used to clean sampling equipment between samples.

SC-1 was placed into glass jars with teflon-lined lids and zero head space, labeled, sealed with QA/QC seals , and preserved on ice in accordance with EPA protocol for laboratory shipment.

The sample was shipped to SPL Laboratory in Houston for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), RCRA metals, and solid waste characteristics (ignitability, corrositivity, reactivity, and toxicity) analysis.

The laboratory analytical results recorded concentrations well below EPA Regulatory Limits and classify the waste as characteristically non-hazardous. A summary of the analytical results are presented in the enclosed tables. Facsimile copies of the laboratory results are attached. We expect to receive the actual laboratory report this week and will forward copies, including chains-of-custody, to you upon receipt.

R & B Environmental appreciates this opportunity to provide you with our professional services. If you have any questions concerning this project, or if we may be of further service, please do not hesitate to contact us.

Respectfully,
R & B Environmental
B01501.SAM

F. Wesley Root

F. Wesley Root
Geologist / Hydrologist

Enclosures

TABLE 1
SUMMARY OF SAMPLE ANALYTICAL RESULTS
TCLP VOLATILE ORGANIC COMPOUNDS (VOCs)
B J Services Wash Bay Storage Facility
R & B Project No. B01501

Volatile Organic Compound Name	Sample ID SC-1 01/24/97	Practical Quantitation Limit (ug/L)	Regulatory Limit (ug/L)
Benzene	190	50	500
2-Butanone	ND	200	200,000
Carbon Tetrachloride	ND	50	500
Chlorobenzene	ND	50	100,000
Chloroform	ND	50	6,000
1,2-Dichloroethane	ND	50	500
1,1-Dichloroethene	ND	50	700
Tetrachloroethene	ND	50	700
Trichloroethene	ND	50	500
Vinyl Chloride	ND	100	200

Analyses were performed using EPA Method 1311 / 8240 by SPL Laboratories.

All results are reported in micrograms per liter; ug/L (parts per billion; ppb). Results liisted in bold type exceed EPA Limits.

ND = Non Detect (concentration less than PQL)

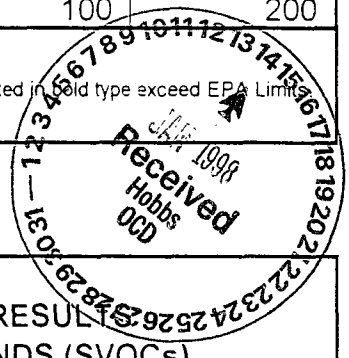


TABLE 2
SUMMARY OF SAMPLE ANALYTICAL RESULTS
TCLP SEMIVOLATILE ORGANIC COMPOUNDS (SVOCs)
B J Services Wash Bay Storage Facility
R & B Project No. B01501

Volatile Organic Compound Name	Sample ID SC-1 01/24/97	Practical Quantitation Limit (ug/L)	Regulatory Limit (ug/L)
ortho-Cresol	ND	50	200,000
meta, para-Cresols	ND	100	200,000
1,4-Dichlorobenzene	ND	50	7,500
2,4-Dinitrotoluene	ND	50	130
Hexachlorobenzene	ND	50	130
Hexachlorobutadiene	ND	50	500
Hexachloroethane	ND	50	3,000
Nitrobenzene	ND	50	2,000
Pentachlorophenol	ND	250	100,000
Pyridine	ND	50	5,000
2, 4, 5-Trichlorophenol	ND	100	400,000
2, 4, 6-Trichlorophenol	ND	50	2,000

Analyses were performed using EPA Method 1311 / 8270 by SPL Laboratories.

All results are reported in micrograms per liter; ug/L (parts per billion; ppb). Results liisted in bold type exceed EPA Limits.

ND = Non Detect (concentration less than PQL)

TABLE 3
SUMMARY OF SAMPLE ANALYTICAL RESULTS
RCI & TCLP METALS
B J Services Wash Bay Storage Facility
R & B Project No. B01501

Tested Parameter Name	Units	Sample ID SC-1 01/24/97	Detection Limit	Regulatory Limit
Reactivity (Cyanide)	mg/Kg	ND	10	250
Reactivity (Sulfide)	mg/Kg	ND	100	500
Soil pH	pH units	5.64	N/A	2 to 12.5
Flash & Fire Point	degrees F	>210	N/A	>140
Arsenic (As)	mg/L	ND	0.20	5.00
Selenium (Se)	mg/L	ND	0.20	1.00
Cadmium (Cd)	mg/L	ND	0.01	1.00
Chromium (Cr)	mg/L	ND	0.02	5.00
Lead (Pb)	mg/L	ND	0.10	5.00
Silver (Ag)	mg/L	ND	0.01	5.00
Barium (Ba)	mg/L	ND	1.00	100.00
Mercury (Hg)	mg/L	ND	0.0004	0.20

Analyses were performed by SPL Laboratories.

using EPA Methods: 1311 / 6010A, 7470, SW846/7.3.4.2, 7.3.3.2, 9045C, ASTM D92-85 .

Results liisted in bold type exceed EPA Limits. ND = Non Detect (concentration less than detection limit)

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

DATE: 02/14/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: SLUDGE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	DETECTION LIMIT	UNITS
Silver, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.01	mg/L
Arsenic, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.2	mg/L
Barium, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	1	mg/L
Cadmium, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.01	mg/L
Chromium, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.02	mg/L
Cyanide-Reactive Method 7.3.3.2 *** Analyzed by: IP Date: 02/05/97	ND	10	mg/Kg

ND - Not detected.

Notes: *Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA
**Ref: Standard Methods for Examination of Water & Wastewater, 18th ed.
***Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

DATE: 02/14/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: SLUDGE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	DETECTION LIMIT	UNITS
Flash and Fire Point- C.O.C. Method ASTM D92-85 Analyzed by: TB Date: 02/04/97	>210		°F
Mercury, TCLP Leachate Method 7470 A*** Analyzed by: PC Date: 02/10/97	ND	0.0004	mg/L
Acid Digestion of TCLP Leachate, ICP Method 3010A *** Analyzed by: MM Date: 01/31/97	01/31/97		
Lead, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.1	mg/L
Soil pH Measured in Water Method 9045C *** Analyzed by: LAR Date: 01/30/97	5.64		pH units
TCLP Leachate Extraction Method 1311 *** Analyzed by: WLR Date: 01/30/97	01/30/97		

ND - Not detected.

Notes: *Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA
**Ref: Standard Methods for Examination of Water & Wastewater, 18th ed.
***Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

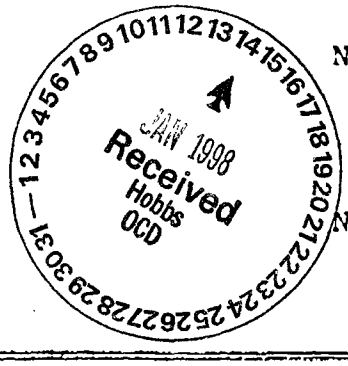
DATE: 02/14/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: SLUDGE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	DETECTION LIMIT	UNITS
TCLP Leachate Extraction Method 1311 *** Analyzed by: WLR Date: 01/30/97	01/30/97		
Zero Headspace extraction Method 1311 Analyzed by: WLR Date: 01/30/97	01/30/97		
Selenium, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.2	mg/L
Sulfide-Reactive Method 7.3.4.2 *** Analyzed by: IP Date: 02/05/97	ND	100	mg/Kg



ND - Not detected.

Notes: *Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA
**Ref: Standard Methods for Examination of Water & Wastewater, 18th ed.
***Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

02/14/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: LEACHATE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS	RL ▲
ortho-Cresol	ND	50	ug/L	200000
meta, para-Cresols	ND	100	ug/L	200000
1,4-Dichlorobenzene	ND	50	ug/L	7500
2,4-Dinitrotoluene	ND	50	ug/L	130
Hexachlorobenzene	ND	50	ug/L	130
Hexachlorobutadiene	ND	50	ug/L	500
Hexachloroethane	ND	50	ug/L	3000
Nitrobenzene	ND	50	ug/L	2000
Pentachlorophenol	ND	250	ug/L	100000
Pyridine	ND	50	ug/L	5000
2,4,5-Trichlorophenol	ND	100	ug/L	400000
2,4,6-Trichlorophenol	ND	50	ug/L	2000

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
Nitrobenzene-d5	50 ug/L	106	35	114
2-Fluorobiphenyl	50 ug/L	94	43	116
Terphenyl-d14	50 ug/L	83	33	141
Phenol-d5	75 ug/L	102	10	110
2-Fluorophenol	75 ug/L	88	21	110
2,4,6-Tribromophenol	75 ug/L	85	10	123

Received JAN 1998 Hobbs OCD

ANALYZED BY: RC DATE/TIME: 02/04/97 17:45:00
LEACHATE EXTRACTION BY: SW DATE/TIME: 01/31/97 13:00:00
METHOD: 1311/8270, TCLP Semivolatiles
NOTES: * - Practical Quantitation Limit ND - Not Detected
NA - Not Analyzed
▲ - Regulatory Limit. Reference Federal Register 55, 11862 (3/29/90), RCRA Toxicity Characteristic Final Rule.

COMMENTS:

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

02/14/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: LEACHATE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

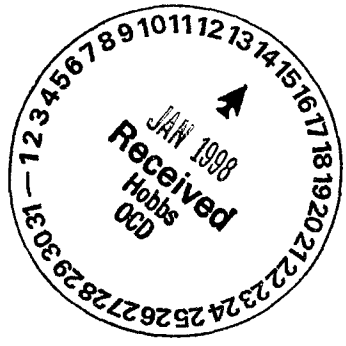
ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS	RL ▲
Benzene	190	50	ug/L	500
2-Butanone	ND	200	ug/L	200000
Carbon Tetrachloride	ND	50	ug/L	500
Chlorobenzene	ND	50	ug/L	100000
Chloroform	ND	50	ug/L	6000
1,2-Dichloroethane	ND	50	ug/L	500
1,1-Dichloroethene	ND	50	ug/L	700
Tetrachloroethene	ND	50	ug/L	700
Trichloroethene	ND	50	ug/L	500
Vinyl Chloride	ND	100	ug/L	200

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
4-Bromofluorobenzene	50 ug/L	100	86	115
1,2-Dichloroethane-d4	50 ug/L	96	76	114
Toluene-d8	50 ug/L	105	88	110

ANALYZED BY: GT DATE/TIME: 01/31/97 14:46:00
LEACHATE PREP(ZHE) BY: WLR DATE/TIME: 01/30/97
METHOD: 1311/8240, TCLP Volatiles
NOTES: * - Practical Quantitation Limit ND - Not Detected
NA - Not Analyzed
▲ - Regulatory Limit. Reference Federal Register 55, 11862 (3/29/90), RCRA Toxicity Characteristic Final Rule.

COMMENTS:



QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

January 24, 1997

Mr. Ken Marsh
Controlled Recovery, Inc. (CRI)
P.O. Box 369
Hobbs, NM 88241

RE: Wastewater Solids /Slurry Disposal at BJ Services Company, U.S.A. Hobbs Facility

Dear Mr. Marsh:

The purpose of this letter is to request sampling and disposal of wastewater solids located at the BJ Services facility in Hobbs, New Mexico. The facility is phisically located at 2708 West County Road in Hobbs. The wastewater solids are located in four tanks (capacities: one 800 gallon and three 12,000 gallon) along the fenceline at the facility. As of the time of this letter, the quantity of wastewater solids is unknown. The wastewater originated from the washrack facility on the BJ Services site as a result of pressure washing activities by BJ.

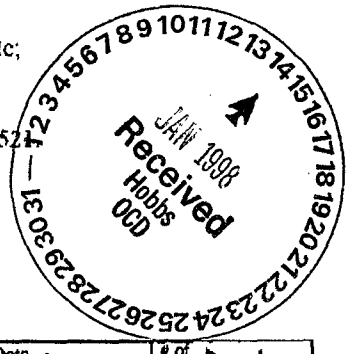
Therefore, I am requesting the following services from CRI:

- sample the wastewater solids contained in the tanks (a composite of all four tanks would be sufficient);
- have the wastewater solids sample analyzed for the constituents required for disposal by the New Mexico Oil Conservation Division (NMOCD) (Full TCLP and RCI);
- seek approval for disposal of the wastewater solids from NMOCD;
- transport the wastewater solids to your NMOCD approved disposal site;
- dispose of the wastewater solids.

If you have any questions regarding this request, please call me at (281) 363-7521.

Sincerely,

Rick N. Johnson
Environmental Specialist

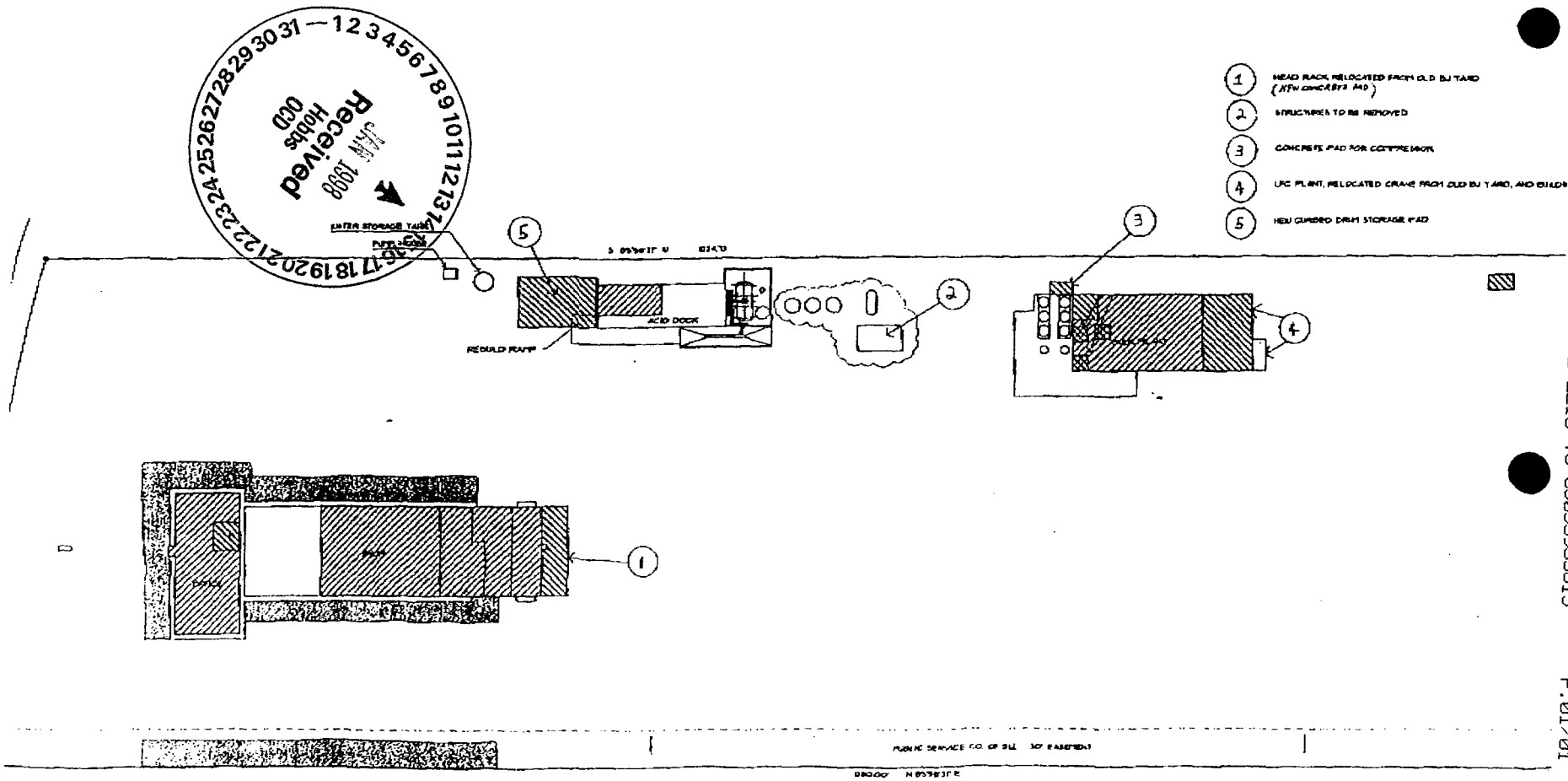


Post-it® Fax Note 7671	Date 1-24	# of pages ▶ 1
To Billie / ART / Ken	From Rick Johnson	
Co./Dept. CRI	Co. BJ	
Phone #	Phone # 281-363-7521	
Fax # 505-393-7615	Fax #	

To: Ken Marsh -CRI

From: Rick N. Johnson -BJS

Here is the site plan for Hobbs, #2 is the tank area.



JAN 27 '98 16:27 FR BJ SERVICES-MIDLAND 713 362 2210 TO 8505393615 P.01/01

** TOTAL PAGE.01 **

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Baker Oil Tools
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Hobbs
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Rowland
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR)	507 W County Rd. Hobbs, NM

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

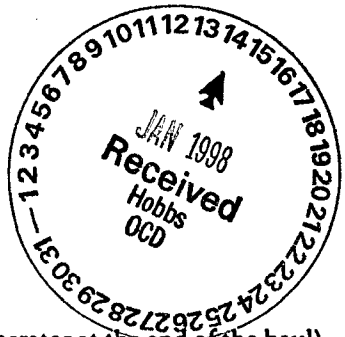
(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Baker Oil Tools Hobbs yard. Tha waste was generated by the steaming of tools. This waste has been approved in the past and I have included a certificate of waste and a chain of custody.

01-001



Estimated Volume 60 cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Office Manager DATE: 01/12/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: [signature] TITLE: Engr DATE: 1/16/98

APPROVED BY: [signature] TITLE: Env. Geologist DATE: 1/21/98

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR Baker Oil Tools

ADDRESS P O Box 1828 Hobbs, NM 88240

GENERATING SITE 507 West County Road Hobbs

COUNTY Lea **STATE** NM

TYPE OF WASTE Sump water

ESTIMATED VOLUME 60 bbls

GENERATING PROCESS steaming tools

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY Rowland Trucking

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT Ray Dockery
SIGNATURE

NAME Ray Dockery
PRINTED

ADDRESS P O Box 1828
Hobbs, NM 88240

DATE 1-16-98

JAN 1998 Received Hobbs OCD

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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Environmental Bureau
Oil Conservation Division

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REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Verbal Approval Received: Yes ☐ No ☐	4. Generator Baker Oil Tools 5. Originating Site Hobbs
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Rowland
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR)	507 W County Rd. Hobbs, NM

9. Circle One:

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B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

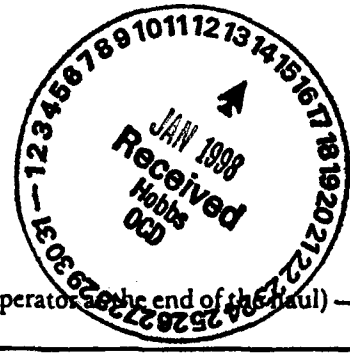
All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Baker Oil Tools Hobbs yard. Tha waste was generated by the steaming of tools. This waste has been approved in the past and I have included a certificate of waste and a chain of custody.

ANALYTICAL on file! JP

01-002



Estimated Volume 60 cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Office Manager DATE: 01/12/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env Engr DATE: 1/16/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 1/21/98

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR Baker Oil Tools

ADDRESS P O Box 1828 Hobbs, NM 88240

GENERATING SITE 507 West County Road Hobbs

COUNTY Lea **STATE** NM

TYPE OF WASTE Sump water

ESTIMATED VOLUME 60 bbls

GENERATING PROCESS steaming tools

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY Rowland Trucking

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AGENT Ray Dockery
SIGNATURE

NAME Ray Dockery
PRINTED

ADDRESS P O Box 1828

Hobbs, NM 88240

DATE 1-21-98

JAN 1998 Received Hobbs OCD

BAKER OIL TOOLS

FAX TRANSMITTAL MEMO

HOBBS, NEW MEXICO

Telephone: 505-397-3671 • Fax: 505-393-4213

Date:	1-21-98		
To:	Billie Charo	**From:**	Ray Dockery
Location:		**Ref:**	
Company:	CRI	**Subject:**	Sump disposal
Fax No.:	393-3615	**# pgs:(inc. this pg)**	2
Copy:			

The waste we are sending remains the same as previously tested.

Ray Dockery

JAN 1998 Received Hobbs OCD

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
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Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Baker Oil Tools
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Hobbs Yard
2. Management Facility Destination Controled Recovery, Inc.	6. Transporter Rowland
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 507 Northwest County Road	Hobbs, New Mexico

9. Circle One:

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BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Baker Oil Tools Hobbs yard. The waste was generated by steaming tools. I have included a cerrtificate of waste and a chain of custody. This material has been approved in the past.

01-012

JAN 1998
Received
Hobbs
OCD

Estimated Volume 60 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo Waste Management Facility Authorized Agent TITLE: Office Manager DATE: 01/13/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env Engr DATE: 1/16/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 1/21/98

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20
JAN 1998
Received
Hobbs
OCD

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR Baker Oil Tools

ADDRESS P O Box 1828 Hobbs, NM 88240

GENERATING SITE 507 West County Road Hobbs

COUNTY Lea **STATE** NM

TYPE OF WASTE Sump water

ESTIMATED VOLUME 60 bbls

GENERATING PROCESS steaming tools

REMARKS

NMOCD FACILITY **CONTROLLED RECOVERY INC.**

TRUCKING COMPANY Rowland Trucking

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AGENT Ray Dockery
SIGNATURE

NAME Ray Dockery
PRINTED

ADDRESS P O Box 1828
Hobbs, NM 88240

DATE 1-26-98

JAN 1998 Received Hobbs OCD

BAKER OIL TOOLS

FAX TRANSMITTAL MEMO

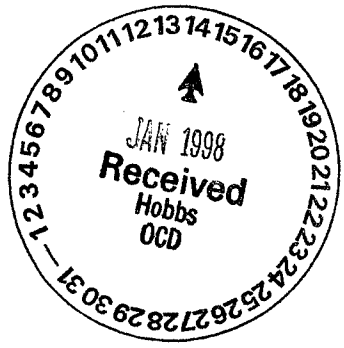
HOBBS, NEW MEXICO

Telephone: 505-397-3671 • Fax: 505-393-4213

Date:	1-26-98		
To:	Billie Charo	**From:**	Ray Dockery
Location:		**Ref:**	
Company:	CRI	**Subject:**	Sump disposal
Fax No.:	393-3615	**# pgs:(inc. this pg)**	2
Copy:			

The waste we are sending remains the same as previously tested.

Ray Dockery



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District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

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Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Hobbs Yard
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01-013

JAN 1998
Received
Hobbs
OCD

Estimated Volume 60 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo Waste Management Facility Authorized Agent TITLE: Office Manager DATE: 01/13/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: 1/16/98

APPROVED BY: _____ TITLE: Env. Geologist DATE: 1/21/98

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR Baker Oil Tools

ADDRESS P O Box 1828 Hobbs, NM 88240

GENERATING SITE 507 West County Road Hobbs

COUNTY Lea **STATE** NM

TYPE OF WASTE Sump water

ESTIMATED VOLUME 60 bbls

GENERATING PROCESS steaming tools

REMARKS

NMOCD FACILITY **CONTROLLED RECOVERY INC.**

TRUCKING COMPANY Rowland Trucking

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT Ray Dockery
SIGNATURE

NAME Ray Dockery
PRINTED

ADDRESS P O Box 1828

Hobbs, NM 88240

DATE 2-2-98

JAN 1998
Received
Hobbs
OCD

BAKER OIL TOOLS

FAX TRANSMITTAL MEMO

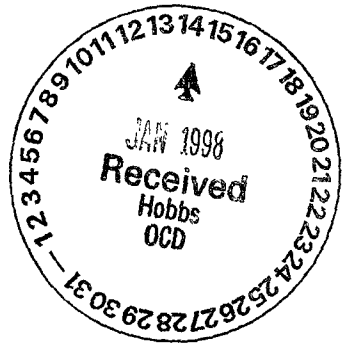
HOBBS, NEW MEXICO

Telephone: 505-397-3671 • Fax: 505-393-4213

Date:	2-2-98		
To:	Billie Charo	**From:**	Ray Dockery
Location:		**Ref:**	
Company:	CRI	**Subject:**	Sump disposal
Fax No.:	393-3615	**# pgs:(inc. this pg)**	2
Copy:			

The waste we are sending remains the same as previously tested.

Ray Dockery



EPIC LABORATORIES, INC.

ANALYTICAL AND QUALITY CONTROL REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

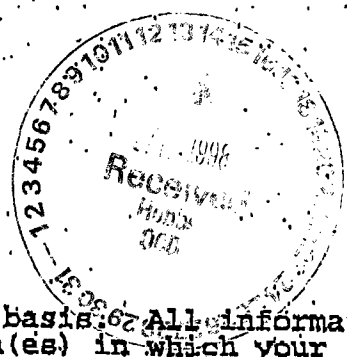
EPIC Job Number: 97.00485

Page 1

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Enclosed are the Analytical Results and Quality Control Data Reports for the following samples submitted to EPIC Laboratories, Inc. for analysis:

Sample Number	Sample Description	Date Taken	Time Taken	Date Received
328563	#1 Sample (Main)	02/12/1997	07:30	02/14/1997
328565	Sample #2 (Main)	02/12/1997	07:30	02/14/1997



This Quality Control report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

Cathy Cuney for
Jim Rowley
Project Manager

NOTE: Results apply only to the samples analyzed. Reproduction of this report is permitted only in its entirety.

ANALYTICAL RESULTS REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485
Sample Number: 328563

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Sample Description: #1 Sample (Main)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
Cyanide, Reactive		<0.25	mg/kg	S-7.3.3.1		02/24/1997	kwo		496	0.25
pH, Corrosivity		7.39	units	S-7.2.2		02/20/1997	eql		1400	N/A
Sulfide, Reactive		30	mg/kg	S-7.3.4.1		02/24/1997	kwo		519	12.5
TCLP-Arsenic, ICP		<0.03	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1516	0.03
TCLP-Barium, ICP		0.22	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1403	0.01
TCLP-Cadmium, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1578	0.01
TCLP-Chromium, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1577	0.01
TCLP-Lead, ICP		0.12	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1586	0.05
TCLP-Mercury, CVAA	EDL	<0.02	mg/L	S-7470A		02/19/1997	bwb		1334	0.0002
TCLP-Selenium, ICP		<0.04	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1515	0.04
TCLP-Silver, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1568	0.01
Ignitability	DNB	>200		ASTM D4982-89		02/21/1997	DAG		511	
TCLP-ACID EXTRACTABLES - 8270					02/20/1997					
TCLP-Cresols, Total		<0.066	mg/L	S-8270A		02/24/1997	dcw	434	419	0.066
TCLP-Pentachlorophenol		<0.33	mg/L	S-8270A		02/24/1997	dcw	434	419	0.33
TCLP-2,4,5-Trichlorophenol		<0.066	mg/L	S-8270A		02/24/1997	dcw	434	419	0.066
TCLP-2,4,6-Trichlorophenol		<0.066	mg/L	S-8270A		02/24/1997	dcw	434	419	0.066
SURR: 2-Fluorophenol		24	% Rec	S-8270A		02/24/1997	dcw	434	419	21-100
SURR: Phenol-d5		20	% Rec	S-8270A		02/24/1997	dcw	434	419	10-94
SURR: 2,4,6-Tribromophenol		68	% Rec	S-8270A		02/24/1997	dcw	434	419	10-123
TCLP-BASE NEUTRALS - 8270					02/20/1997					
TCLP-1,4-Dichlorobenzene		<0.066	mg/L	S-8270A		02/24/1997	dcw	434	418	0.066
TCLP-2,4-Dinitrotoluene		<0.066	mg/L	S-8270A		02/24/1997	dcw	434	418	0.066
TCLP-Hexachlorobenzene		<0.066	mg/L	S-8270A		02/24/1997	dcw	434	418	0.066
TCLP-Hexachlorobutadiene		<0.066	mg/L	S-8270A		02/24/1997	dcw	434	418	0.066
TCLP-Hexachloroethane		<0.066	mg/L	S-8270A		02/24/1997	dcw	434	418	0.066
TCLP-Nitrobenzene		<0.066	mg/L	S-8270A		02/24/1997	dcw	434	418	0.066
TCLP-Pyridine		<0.066	mg/L	S-8270A		02/24/1997	dcw	434	418	0.066
SURR: 2-Fluorobiphenyl		99	% Rec	S-8270A		02/24/1997	dcw	434	418	43-116
SURR: Nitrobenzene-d5		64	% Rec	S-8270A		02/24/1997	dcw	434	418	35-114
SURR: Terphenyl-d14		98	% Rec	S-8270A		02/24/1997	dcw	434	418	33-141

DNB - Does not Burn.
EDL - Elevated Detection Limit due to matrix interference.

ANALYTICAL RESULTS REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00465
Sample Number: 328563

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Sample Description: #1 Sample (Main)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
TCLP-8240										
TCLP-Benzene		0.055	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-2-Butanone (MEK)		<0.50	mg/L	S-8240A		02/27/1997	acg		1173	0.50
TCLP-Carbon Tetrachloride		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Chlorobenzene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Chloroform		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-1,2-Dichloroethane		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-1,1-Dichloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Tetrachloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Trichloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Vinyl chloride		<0.05	mg/L	S-8240A		02/27/1997	acg		1173	0.05
SURR: 1,2-Dichloroethane-d4		107	% Rec	S-8240A		02/27/1997	acg		1173	76-114
SURR: Toluene-d8		109	% Rec	S-8240A		02/27/1997	acg		1173	88-110
SURR: 4-Bromofluorobenzene		105	% Rec	S-8240A		02/27/1997	acg		1173	86-115

ANALYTICAL RESULTS REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485
Sample Number: 328565

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Sample Description: Sample #2 (Main)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
Cyanide, Reactive		<0.25	mg/kg	S-7.3.3.1		02/24/1997	kwo		496	0.25
pH, Corrosivity		7.61	White	S-7.2.2		02/20/1997	cgl		1400	N/A
Sulfide, Reactive		<12.5	mg/kg	S-7.3.4.1		02/24/1997	kwo		519	12.5
TCLP-Arsenic, ICP		<0.03	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1516	0.02
TCLP-Barium, ICP		0.20	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1403	0.01
TCLP-Cadmium, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1578	0.01
TCLP-Chromium, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1577	0.01
TCLP-Lead, ICP		0.1	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1586	0.01
TCLP-Mercury, CVAA	EDL	<0.02	mg/L	S-7470A		02/19/1997	bwh		1534	0.0002
TCLP-Selenium, ICP		<0.04	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1515	0.04
TCLP-Silver, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1568	0.01
Ignitability	DNB	>200		ASTM D4982-89		02/21/1997	bss		511	
TCLP-ACID EXTRACTABLES - 8270					02/20/1997					
TCLP-Cresols, Total		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Pentachlorophenol		<0.33	mg/L	S-8270A		02/24/1997	dtw	434	419	0.33
TCLP-2,4,5-Trichlorophenol		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-2,4,6-Trichlorophenol		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
SURR: 2-Fluorophenol		93	% Rec	S-8270A		02/24/1997	dtw	434	419	21-100
SURR: Phenol-d5		76	% Rec	S-8270A		02/24/1997	dtw	434	419	10-94
SURR: 2,4,6-Tribromophenol		119	% Rec	S-8270A		02/24/1997	dtw	434	419	10-123
TCLP-BASE NEUTRALS - 8270					02/20/1997					
TCLP-1,4-Dichlorobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-2,4-Dinitrotoluene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Hexachlorobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Hexachlorobutadiene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Hexachloroethane		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Nitrobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Pyridine		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
SURR: 2-Fluorobiphenyl		105	% Rec	S-8270A		02/24/1997	dtw	434	419	43-116
SURR: Nitrobenzene-d5		99	% Rec	S-8270A		02/24/1997	dtw	434	419	35-114
SURR: Terphenyl-d14		76	% Rec	S-8270A		02/24/1997	dtw	434	419	33-141

DNB - Does not burn.
EDL - Elevated Detection Limit due to matrix interference.

ANALYTICAL RESULTS REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1626
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485
Sample Number: 328565

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Sample Description: Sample #2 (Main)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
TCLP-8240										
TCLP-Benzene		0.059	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-2-Butanone (MEK)		<0.50	mg/L	S-8240A		02/27/1997	acg		1173	0.50
TCLP-Carbon Tetrachloride		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Chlorobenzene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Chloroform		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-1,2-Dichloroethane		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-1,1-Dichloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Tetrachloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Trichloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Vinyl chloride		<0.05	mg/L	S-8240A		02/27/1997	acg		1173	0.05
SURR: 1,2-Dichloroethane-d4		106	% Rec	S-8240A		02/27/1997	acg		1173	76-114
SURR: Toluene-d8		109	% Rec	S-8240A		02/27/1997	acg		1173	88-110
SURR: 4-Bromofluorobenzene		109	% Rec	S-8240A		02/27/1997	acg		1173	86-115

QUALITY CONTROL REPORT
BLANKS

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Blank Result	Units	Reporting Limit	Date Analyzed	Prep Batch Number	Run Batch Number
Cyanide, Reactive		<0.25	mg/kg	0.25	02/26/1997		496
Sulfide, Reactive		<12.5	mg/kg	12.5	02/24/1997		519
TCLP-Arsenic, ICP		<0.03	mg/L	0.03	02/19/1997	1200	1516
TCLP-Barium, ICP		<0.01	mg/L	0.01	02/19/1997	1200	1403
TCLP-Cadmium, ICP		<0.01	mg/L	0.01	02/19/1997	1200	1578
TCLP-Chromium, ICP		<0.01	mg/L	0.01	02/19/1997	1200	1577
TCLP-Lead, ICP		<0.03	mg/L	0.03	02/19/1997	1200	1586
TCLP-Mercury, CVAA		<0.0002	mg/L	0.0002	02/19/1997		1334
TCLP-Selenium, ICP		<0.04	mg/L	0.04	02/19/1997	1200	1515
TCLP-Silver, ICP		<0.01	mg/L	0.01	02/19/1997	1200	1668
TCLP-ACID EXTRACTABLES - 8270							
TCLP-Cresols, Total		<0.066	mg/L	0.066	02/24/1997	434	419
TCLP-Pentachlorophenol		<0.33	mg/L	0.33	02/24/1997	434	419
TCLP-2,4,5-Trichlorophenol		<0.066	mg/L	0.066	02/24/1997	434	419
TCLP-2,4,6-Trichlorophenol		<0.066	mg/L	0.066	02/24/1997	434	419
TCLP-BASE NEUTRALS - 8270							
TCLP-1,4-Dichlorobenzene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-2,4-Dinitrotoluene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Hexachlorobenzene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Hexachlorobutadiene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Hexachloroethane		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Nitrobenzene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Pyridine		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-8260							
TCLP-Benzene		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-2-Butanone (MEK)		<0.50	mg/L	0.50	02/27/1997		1173
TCLP-Carbon Tetrachloride		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-Chlorobenzene		<0.025	mg/L	0.025	02/27/1997		1173

All parameters should be less than the reporting limit.

QUALITY CONTROL REPORT
BLANKS

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Blank Result	Units	Reporting Limit	Date Analyzed	Prep Batch Number	Run Batch Number
TCLP-Chloroform		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-1,2-Dichloroethane		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-1,1-Dichloroephene		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-Tetrachloroethene		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-Trichloroethane		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-Vinyl chloride		<0.05	mg/L	0.05	02/27/1997		1173

All parameters should be less than the reporting limit.

QUALITY CONTROL REPORT
CONTINUING CALIBRATION VERIFICATION STANDARD

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	CCVS True Concentration	Units	CCVS Concentration Found	CCVS Percent Recovery	Date Analyzed	Run Batch Number
Cyanide, Reactive		1.0	mg/kg	1.0	100.0	02/24/1997	496
Sulfide, Reactive		1000	mg/kg	1000	100.0	02/24/1997	519
TCLP-Arsenic, ICP		1.00	mg/L	1.10	110.0	02/19/1997	1616
TCLP-Arsenic, ICP		1.00	mg/L	1.10	110.0	02/19/1997	1616
TCLP-Barium, ICP		1.00	mg/L	0.99	99.0	02/19/1997	1603
TCLP-Barium, ICP		1.00	mg/L	0.99	99.0	02/19/1997	1603
TCLP-Cadmium, ICP		1.00	mg/L	1.02	102.0	02/19/1997	1578
TCLP-Cadmium, ICP		1.00	mg/L	1.02	102.0	02/19/1997	1578
TCLP-Chromium, ICP		1.00	mg/L	1.01	101.0	02/19/1997	1577
TCLP-Chromium, ICP		1.00	mg/L	1.01	101.0	02/19/1997	1577
TCLP-Lead, ICP		1.00	mg/L	1.00	100.0	02/19/1997	1586
TCLP-Lead, ICP		1.00	mg/L	1.00	100.0	02/19/1997	1586
TCLP-Mercury, CVAA		0.50	mg/L	0.52	104.0	02/19/1997	1334
TCLP-Selenium, ICP		1.00	mg/L	1.04	104.0	02/19/1997	1615
TCLP-Selenium, ICP		1.00	mg/L	1.04	104.0	02/19/1997	1615
TCLP-Silver, ICP		1.00	mg/L	0.98	98.0	02/19/1997	1568
TCLP-Silver, ICP		1.00	mg/L	0.98	98.0	02/19/1997	1568
TCLP-ACID EXTRACTABLES - 8270							
TCLP-Cresols, Total		0.10	mg/L	0.078	78.0	02/24/1997	419
TCLP-Pentachlorophenol		0.050	mg/L	0.057	114.0	02/24/1997	419
TCLP-2,4,5-Trichlorophenol		0.050	mg/L	0.045	90.0	02/24/1997	419
TCLP-2,4,6-Trichlorophenol		0.050	mg/L	0.045	90.0	02/24/1997	419
TCLP-BASE NEUTRALS - 8270							
TCLP-1,4-Dichlorobenzene		0.050	mg/L	0.040	80.0	02/24/1997	418
TCLP-2,4-Dinitrotoluene		0.050	mg/L	0.044	88.0	02/24/1997	418
TCLP-Hexachlorobenzene		0.050	mg/L	0.055	110.0	02/24/1997	418
TCLP-Hexachlorobutadiene		0.050	mg/L	0.049	98.0	02/24/1997	418
TCLP-Hexachloroethane		0.050	mg/L	0.039	78.0	02/24/1997	418

CCVS - Continuing Calibration Verification Standard

QUALITY CONTROL REPORT
CONTINUING CALIBRATION VERIFICATION STANDARD

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	CCVS True Concentration	Units	CCVS Concentration Found	CCVS Percent Recovery	Date Analyzed	Run Batch Number
TCLP-Nitrobenzene		0.050	mg/L	0.040	80.0	02/24/1997	418
TCLP-Pyridine		0.050	mg/L	0.042	84.0	02/24/1997	418
TCLP-8240							
TCLP-Benzene		0.020	mg/L	0.023	115.0	02/27/1997	1173
TCLP-2-Butanone (MEK)		0.020	mg/L	0.023	115.0	02/27/1997	1173
TCLP-Carbon Tetrachloride		0.020	mg/L	0.019	95.0	02/27/1997	1173
TCLP-Chlorobenzene		0.020	mg/L	0.021	105.0	02/27/1997	1173
TCLP-Chloroform		0.020	mg/L	0.022	110.0	02/27/1997	1173
TCLP-1,2-Dichloroethane		0.020	mg/L	0.022	110.0	02/27/1997	1173
TCLP-1,1-Dichloroethene		0.020	mg/L	0.020	100.0	02/27/1997	1173
TCLP-Tetrachloroethene		0.020	mg/L	0.023	115.0	02/27/1997	1173
TCLP-Trichloroethene		0.020	mg/L	0.022	110.0	02/27/1997	1173
TCLP-Vinyl chloride		0.020	mg/L	0.018	90.0	02/27/1997	1173

CCVS - Continuing Calibration Verification Standard

QUALITY CONTROL REPORT
MATRIX SPIKE/MATRIX SPIKE DUPLICATE

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Units	Sample Result	Spike Amount Added	Matrix Spike Result	MS Percent Recovery	Duplicate Spike Amount Added	MSD Result	MSD Percent Recovery	MS/MSD RPD	Date Analyzed	Prep Batch Number	Run Batch Number
TCLP-Arsenic, ICP		mg/L	<0.03	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/18/1997		1516
TCLP-Arsenic, ICP		mg/L	<0.03	1.00	1.03	103.0	1.00	1.08	108.0	4.7	02/19/1997	1200	1516
TCLP-Barium, ICP		mg/L	<0.01	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/18/1997		1403
TCLP-Barium, ICP		mg/L	0.57	1.00	1.41	84.0	1.00	1.61	94.0	11.2	02/19/1997	1200	1403
TCLP-Cadmium, ICP		mg/L	<0.01	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1578
TCLP-Cadmium, ICP		mg/L	<0.01	1.00	0.92	92.0	1.00	0.98	98.0	6.3	02/19/1997	1200	1578
TCLP-Chromium, ICP		mg/L	<0.01	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1577
TCLP-Chromium, ICP		mg/L	0.04	1.00	0.95	91.0	1.00	1.03	99.0	8.4	02/19/1997	1200	1577
TCLP-Lead, ICP		mg/L	<0.03	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1586
TCLP-Lead, ICP		mg/L	0.42	1.00	1.30	88.0	1.00	1.38	96.0	8.7	02/19/1997	1200	1586
TCLP-Mercury, CVAA		mg/L	0.0002	0.50	0.50	100.0	0.50	0.50	100.0	0.0	02/19/1997		1334
TCLP-Selenium, ICP		mg/L	<0.04	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/18/1997		1515
TCLP-Selenium, ICP		mg/L	<0.04	1.00	1.05	105.0	1.00	1.14	114.0	8.2	02/19/1997	1200	1515
TCLP-Silver, ICP		mg/L	<0.01	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1566
TCLP-Silver, ICP		mg/L	<0.01	1.00	0.88	88.0	1.00	0.93	93.0	5.5	02/19/1997	1200	1566
TCLP-ACID EXTRACTABLES - 8270													
TCLP-Cresols, Total		mg/L	<0.066	0.30	0.109	36.3	0.30	0.111	37.0	1.9	02/24/1997	434	419
TCLP-Pentachlorophenol		mg/L	<0.33	0.10	0.043	43.0	0.10	0.049	49.0	13.0	02/24/1997	434	419
TCLP-2,4,5-Trichlorophenol		mg/L	<0.066	0.10	0.044	44.0	0.10	0.048	48.0	8.7	02/24/1997	434	419
TCLP-2,4,6-Trichlorophenol		mg/L	<0.066	0.10	0.046	46.0	0.10	0.041	41.0	15.7	02/24/1997	434	419
TCLP-BASE NEUTRALS - 8270													
TCLP-1,4-Dichlorobenzene		mg/L	<0.066	0.10	0.040	40.0	0.10	0.042	42.0	4.9	02/24/1997	434	418
TCLP-2,4-Dinitrotoluene		mg/L	<0.066	0.10	0.043	43.0	0.10	0.044	44.0	2.3	02/24/1997	434	418
TCLP-Hexachlorobenzene		mg/L	<0.066	0.10	0.044	44.0	0.10	0.050	50.0	12.8	02/24/1997	434	418
TCLP-Hexachlorobutadiene		mg/L	<0.066	0.10	0.046	46.0	0.10	0.048	48.0	5.5	02/24/1997	434	418

NOTE: The Quality Control data in this report reflects the batch in which your sample was prepped and/or analyzed. The sample selected for QA may not necessarily be your sample.

QUALITY CONTROL REPORT
MATRIX SPIKE/MATRIX SPIKE DUPLICATE

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Units	Sample Result	Spike Amount Added	Matrix Spike Result	MS Percent Recovery	Duplicate Spike Amount Added	MSD Result	MSD Percent Recovery	MS/MSD RPD	Date Analyzed	Prep Batch Number	Run Batch Number
TCLP-Hexachloroethane		mg/L	<0.066	0.10	0.048	48.0	0.10	0.045	45.0	2.1	02/24/1997	434	418
TCLP-Nitrobenzene		mg/L	<0.066	0.10	0.046	46.0	0.10	0.047	47.0	2.2	02/24/1997	434	418
TCLP-Pyridine		mg/L	<0.066	0.10	0.060	60.0	0.10	0.062	62.0	3.3	02/24/1997	434	418
TCLP-8260													
TCLP-Benzene		mg/L	<0.025	0.020	0.025	125.0	0.020	0.026	125.0	0.0	02/27/1997		1173
TCLP-2-Butanone (MEK)		mg/L	<0.50	0.020	0.019	95.0	0.020	0.018	90.0	5.4	02/27/1997		1173
TCLP-Carbon Tetrachloride		mg/L	<0.025	0.020	0.020	100.0	0.020	0.019	95.0	5.0	02/27/1997		1173
TCLP-Chlorobenzene		mg/L	<0.025	0.020	0.023	115.0	0.020	0.023	115.0	0.0	02/27/1997		1173
TCLP-Chloroform		mg/L	<0.026	0.020	0.024	120.0	0.020	0.023	115.0	4.3	02/27/1997		1173
TCLP-1,2-Dichloroethane		mg/L	<0.025	0.020	0.022	110.0	0.020	0.022	110.0	0.0	02/27/1997		1173
TCLP-1,1-Dichloroethene		mg/L	<0.025	0.020	0.021	105.0	0.020	0.021	105.0	0.0	02/27/1997		1173
TCLP-Tetrachloroethene		mg/L	<0.025	0.020	0.024	120.0	0.020	0.021	105.0	13.3	02/27/1997		1173
TCLP-Trichloroethene		mg/L	<0.025	0.020	0.022	110.0	0.020	0.022	110.0	0.0	02/27/1997		1173
TCLP-Vinyl chloride		mg/L	<0.05	0.020	0.017	85.0	0.020	0.015	75.0	12.5	02/27/1997		1173

NOTE: The Quality Control data in this report reflects the batch in which your sample was prepped and/or analyzed. The sample selected for QA may not necessarily be your sample.

QUALITY CONTROL REPORT
DUPLICATES

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Units	Sample Result	Duplicate Sample Result	RPD	Date Analyzed	Prep Batch Number	Run Batch Number
pH, Corrosivity		units	7.24	7.31	0.4	02/20/1997		1400

QUALITY CONTROL REPORT
LABORATORY CONTROL STANDARD

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Analyte	Prep Batch No.	Run Batch No.	LCS True Conc	Units	LCS Conc Found	LCS % Rec:	LCS Dup Conc. Found	LCS Dup % Rec	LCS % RPD	Flag	Date Analyzed
Cyanide, Reactive		496	1000	mg/kg	379	37.9					02/24/1997
pH, Corrosivity		1400	9.18	units	8.94	97.4					02/20/1997
Sulfide, Reactive		519	1000	mg/kg	960	96.0					02/24/1997
TCLP-Arsenic, ICP	1200	1516	1.00	mg/L	1.05	105.0					02/18/1997
TCLP-Barium, ICP	1200	1403	1.00	mg/L	1.00	100.0					02/19/1997
TCLP-Cadmium, ICP	1200	1578	1.00	mg/L	0.99	99.0					02/19/1997
TCLP-Chromium, ICP	1200	1577	1.00	mg/L	0.99	99.0					02/19/1997
TCLP-Lead, ICP	1200	1566	1.00	mg/L	0.98	98.0					02/19/1997
TCLP-Mercury, CVAA		1334	0.50	mg/L	0.57	114.0					02/19/1997
TCLP-Selenium, ICP	1200	1515	1.00	mg/L	0.97	97.0					02/19/1997
TCLP-Silver, ICP	1200	1568	1.00	mg/L	0.91	91.0					02/19/1997
TCLP-ACID EXTRACTABLES - 8270											
TCLP-Cresols, Total	434	419	0.20	mg/L	0.137	68.7					02/24/1997
TCLP-Pentachlorophenol	434	419	0.10	mg/L	0.038	38.0					02/24/1997
TCLP-2,4,6-Trichlorophenol	434	419	0.10	mg/L	0.047	47.0					02/24/1997
TCLP-2,4,5-Trichlorophenol	434	419	0.10	mg/L	0.057	57.0					02/24/1997
TCLP-BASE NEUTRALS - 8270											
TCLP-1,4-Dichlorobenzene	434	418	0.10	mg/L	0.045	45.0					02/24/1997
TCLP-2,4-Dinitrotoluene	434	418	0.10	mg/L	0.056	56.0					02/24/1997
TCLP-Hexachlorobenzene	434	418	0.10	mg/L	0.050	50.0					02/24/1997
TCLP-Hexachlorobutadiene	434	418	0.10	mg/L	0.038	38.0					02/24/1997
TCLP-Hexachloroethane	434	418	0.10	mg/L	0.046	46.0					02/24/1997
TCLP-Nitrobenzene	434	418	0.10	mg/L	0.058	58.0					02/24/1997
TCLP-Pyridine	434	418	0.10	mg/L	0.061	61.0					02/24/1997
TCLP-8240											
TCLP-Benzene		1173	0.020	mg/L	0.023	115.0					02/27/1997
TCLP-2-Butanone (MEK)		1173	0.020	mg/L	0.025	125.0					02/27/1997
TCLP-Carbon Tetrachloride		1173	0.020	mg/L	0.020	100.0					02/27/1997
TCLP-Chlorobenzene		1173	0.020	mg/L	0.023	115.0					02/27/1997
TCLP-Chloroform		1173	0.020	mg/L	0.022	110.0					02/27/1997
TCLP-1,2-Dichloroethane		1173	0.020	mg/L	0.021	105.0					02/27/1997

LCS - Laboratory Control Standard

For samples with insufficient sample volume, an LCS/LCS duplicate is reported instead of an MS/MSD.

QUALITY CONTROL REPORT
LABORATORY CONTROL STANDARD

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Analyte	Prep Batch No.	Run Batch No.	LCS True Conc	Units	LCS Conc Found	LCS % Rec.	LCS Dup Conc. Found	LCS Dup % Rec	LCS % RPD	Flag	Date Analyzed
TCLP-1,1-Dichloroethene		1173	0.020	mg/L	0.021	105.0					02/27/1997
TCLP-Tetrachloroethene		1173	0.020	mg/L	0.027	135.0					02/27/1997
TCLP-Trichloroethene		1173	0.020	mg/L	0.023	115.0					02/27/1997
TCLP-Vinyl chloride		1173	0.020	mg/L	0.018	90.0					02/27/1997

LCS - Laboratory Control Standard

For samples with insufficient sample volume, an LCS/LCS duplicate is reported instead of an MS/MSD.

SPIKES

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Date Analyzed	Units	Prep Batch Number	Run Batch Number	Spiked Sample Result	Sample Result	Spike Amount	Percent Recovery
Cyanide, Reactive		02/24/1997	mg/kg		496	298	<0.25	1000	29.8
Sulfide, Reactive		02/24/1997	mg/kg		519	240	<12.5	250	96.0

Advisory Control Limits for Percent Recovery are 85-115%.

CHAIN OF CUSTODY RECORD

EPIC LABORATORIES, INC.
1548 VALWOOD PARKWAY, SUITE 118
CARROLLTON, TEXAS 75006
DALLAS (972) 406-8100
AUSTIN (512) 928-8805

COMPANY: Baker Oil Tools
ADDRESS: 507 WEST Bender Road - Hobbs NM 88240
PHONE: 505-397-3671 FAX: 505-393-4213
PROJECT NAME/LOCATION: Hobbs Sump
PROJECT NUMBER:
PROJECT MANAGER:

REPORT TO: Ray Dockery
INVOICE TO: Ray Dockery
P.O. NO.:
EPIC QUOTE NO.:

SAMPLED BY (PRINT NAME): Dennis Collins Jr
SIGNATURE:
(PRINT NAME): B.H. Russell
SIGNATURE: Bill Russell

To assist us in selecting the proper method:
Is this work being conducted for regulatory compliance monitoring? Yes ✓ No
Is this work being conducted for regulatory enforcement action? Yes No ✓
Which regulations apply: RCRA ___ NPDES Wastewater ___ UST ___ Drinking Water ___ Other ___ None ___

#	TIME	SAMPLE ID/DESCRIPTION	MATRIX	GRAB	COMP	# and Type of Containers: HCl	HNO3	H2SO4	OTHER	TCLP-metals	TCLP semi-vols	TCLP-volatiles	BOT	COMMENTS
2/1/97	0730	#1 - Sump (MAIN)	WL		X				1	✓	✓	✓	✓	
2/1/97	0730	#2 - Sump (MAIN)	WL		X				1	✓	✓	✓	✓	

CONDITION OF SAMPLE: BOTTLES INTACT? YES / NO
FIELD FILTERED? YES / NO
COC SEALS PRESENT AND INTACT? YES / NO
VOLATILES FREE OF HEADSPACE? YES / NO
TEMPERATURE UPON RECEIPT: 4°C
Bottles supplied by EPIC? YES / NO

SAMPLE REMAINDER DISPOSAL: RETURN SAMPLE REMAINDER TO CLIENT VIA ___
I REQUEST EPIC TO DISPOSE OF ALL SAMPLE REMAINDERS ✓
DATE ___

RELINQUISHED BY:	DATE	TIME	RECEIVED BY:	RELINQUISHED BY:	DATE	TIME	RECEIVED FOR EPIC BY:
					2/4/97	1040	Charlene Walker

METHOD OF SHIPMENT: FED EX -

REMARKS: Sump was sieved with the 5m 30min. Sample was taken 1 FOOT from bottom with a trip Sampler.

PT 1 - ORIGINAL - WHITE PT 2 - EPIC PROJECT MANAGER - YELLOW PT 3 - CUSTOMER COPY - PINK

02/28/97 15:54 2872 484 TRAT EPIC LABS INC

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-1
Originated 8/.

Submit Orig
Plus 1 C
to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator LG & e Natural
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Carlsbad compressor
2. Management Facility Destination Controled Recovery, Inc.	6. Transporter Rowland
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) Carlsbad Compressor Station Lot 9 6-21S-28E	New Mexioc Eddy County

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the L G & E Natural. The waste was generated by rain water caught from the environmental bases on compressor. I have inlcuded a certificat of waste and a chain of custody.

01-007

JAN 1998
Received
Hobbs
OCD

Sent to Hobbs 1/27/98

Estimated Volume 100 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Office Manager DATE: 01/07/98
Waste Management FacilityAuthorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Envir Engr 1/23 DATE: 1/16/98

APPROVED BY: _____ TITLE: Env. Geologist DATE: 1/26/98

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR L G & E Natural

ADDRESS 921 West Sanger Hobbs, New Mexico

GENERATING SITE North East Carlsbad Compressor Station

COUNTY Eddy STATE New Mexico

TYPE OF WASTE Rain water caught from environmental bases of compressor

ESTIMATED VOLUME 100 bbls

GENERATING PROCESS equipment skids caught rain water and wash down water

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY Rowland Trucking

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT _____
SIGNATURE

NAME Ed Sloman
PRINTED

ADDRESS 921 Wesst Sanger Hobbs, New Mexico

DATE 01/07/98

JAN 1998
Received
Hobbs
OCD

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
Attention: Allen Hodge
P. O. Box 1816
Hobbs, NM 88241

October 29, 1997
Receiving Date: 10/16/97
Sample Type: Water
Project No: #1035
Project Location: Berton Flats

Extraction Date: 10/21/97
Analysis Date: 10/27/97
Sampling Date: 10/16/97
Sample Condition: I & C
Sample Received by: BL
Project Name: Non-Exempt Rain/ Wash Water Tank

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T83496 Rain/Wash Water Tank	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	69	*147	31	86
1,4-Dichlorobenzene	7.5	0.05	ND	82	1	43	103
o-Cresol	200.0	0.05	ND	86	5	46	108
m,p-Cresol	200.0	0.05	ND	79	4	46	99
Hexachloroethane	3.0	0.05	ND	67	4	54	84
Nitrobenzene	2.0	0.05	ND	71	1	74	89
Hexachlorobutadiene	0.5	0.05	ND	70	2	57	88
2,4,6-Trichlorophenol	2.0	0.05	ND	90	5	43	113
2,4,5-Trichlorophenol	400.0	0.05	ND	78	0	43	98
2,4-Dinitrotoluene	0.13	0.05	ND	82	4	51	103
2,4-D	10.0	0.05	ND	75	7	18	94
Hexachlorobenzene	0.13	0.05	ND	81	0	63	101
2,4,5-TP	1.0	0.05	ND	73	13	21	91
Pentachlorophenol	100.0	0.05	ND	91	4	50	114

Surrogates	% RECOVERY
2-Fluorophenol	44
Phenol-d6	39
Nitrobenzene-d5	64
2-Fluorobiphenyl	76
2,4,6-Tribromophenol	84
Terphenyl-d14	111

ND - Not Detected

***NOTE; RPD out of limits.**

Methods: EPA SW 846-1311, 8270, 8080.
CHEMIST: RP/HW

JAN 1998 Received Hobbs OCD

Director, Dr. Blair Leftwich

DATE

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
Attention: Allen Hodge
P. O. Box 1816
Hobbs, NM 88241

October 29, 1997
Receiving Date: 10/16/97
Sample Type: Water
Project No: #1035
Project Location: Berton Flats

Extraction Date: 10/16/97
Analysis Date: 10/16/97
Sampling Date: 10/16/97
Sample Condition: I & C
Sample Received by: BL
Project Name: Non-Exempt Rain/ Wash Water Tank

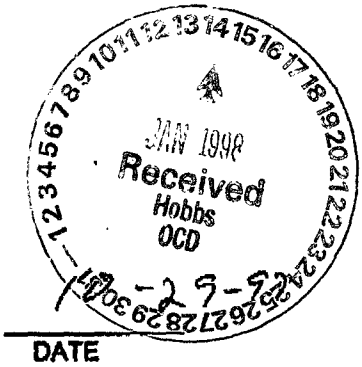
TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T83496 Rain/Wash Water Tank	QC	RPD	%EA	%IA
Vinyl chloride	0.20	0.05	ND	0.107	1	89	107
1,1-Dichloroethene	0.70	0.05	ND	0.101	2	96	101
Methyl Ethyl Ketone	200.0	0.5	ND	0.087	8	95	87
Chloroform	6.00	0.05	ND	0.102	1	100	102
1,2-Dichloroethane	0.50	0.05	ND	0.101	2	102	101
Benzene	0.50	0.05	ND	0.102	1	100	102
Carbon Tetrachloride	0.50	0.05	ND	0.119	2	100	119
Trichloroethene	0.50	0.05	ND	0.098	2	104	98
Tetrachloroethene	0.70	0.05	ND	0.100	2	106	100
Chlorobenzene	100.00	0.05	ND	0.105	1	103	105
1,4-Dichlorobenzene	7.50	0.05	ND	0.102	1	100	102

SURROGATES	% Recovery
Dibromofluoromethane	100
Toluene-d8	97
4-Bromofluorobenzene	96

ND = Not Detected

METHODS: EPA SW 846-1311, 8260.
CHEMIST: RW

Director, Dr. Blair Leftwich



DATE

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
Attention: Allen Hodge
P. O. Box 1816
Hobbs, NM 88241

October 29, 1997
Receiving Date: 10/16/97
Sample Type: Water
Project No: #1035
Project Location: Berton Flats

Extraction Date: 10/21/97
Analysis Date: 10/21/97
Sampling Date: 10/16/97
Sample Condition: I & C
Sample Received by: BL
Proj. Name: Non-Exempt Rain/
Wash Water Tank

Received
JAN 1998
Hobbs
OCD

TCLP METALS (mg/L)

		As	Se	Cd	Cr	Pb	Ag	Ba	Hg
	EPA LIMIT	5.0	1.0	1.0	5.0	5.0	5.0	100.0	0.20
T83496	Rain/Wash Water Tank	<0.10	<0.10	<0.02	<0.05	<0.10	<0.01	<0.20	<0.01
QC	Quality Control	5.1	5.0	4.9	4.9	5.0	0.98	5.1	0.0475
	Reporting Limit	0.10	0.10	0.02	0.05	0.10	0.01	0.20	0.01
	RPD	14	1	1	0	1	5	1	2
	% Extraction Accuracy	*(LCS) 85	109	96	86	97	97	109	113
	% Instrument Accuracy	102	100	98	98	99	98	102	95

***NOTE: LCS used for Extraction Accuracy due to matrix effects.**

CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba: RR Hg: HC
METHODS: EPA SW 846-1311, 6010B, 7470.
TCLP METALS SPIKE: 2.0 mg/L As, Se, Cd, Cr, Pb, Ba; 1.0 mg/L Ag; 0.05 mg/L Hg.
TCLP METALS QC: 5.0 mg/L As, Se, Cd, Cr, Pb, Ba; 1.0 mg/L Ag; 0.05 mg/L Hg.

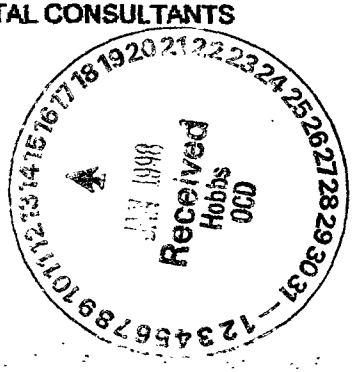
Director, Dr. Blair Leftwich

10-29-97
Date

ID:
JAN 06'98 8:18 No.001 P.05

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
Attention: Allen Hodge
P. O. Box 1816
Hobbs, NM 88241



October 29, 1997
Receiving Date: 10/16/97
Sample Type: Water
Project No: #1035
Project Location: Berton Flats

Extraction Date: 10/27/97
Analysis Date: 10/27/97
Sampling Date: 10/16/97
Sample Condition: I & C
Sample Received by: BL
Proj. Name: Non-Exempt Rain/ Wash Water Tank

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY (mm/yr)	pH (s.u.)	FLASHPOINT (°F)
	EPA LIMIT =	—	500	250	>6.5 mm/yr	<2 >12.5	>140°F
T83496	Rain/Wash Water Tank	Non-reactive	<10	<2.5	Non-corrosive 0.85	6.8	>150
QC	Quality Control	—	—	—	—	7.0	—
RPD		0	0	0	0	0	0
% Extraction Accuracy		—	—	—	—	—	—
% Instrument Accuracy		—	—	—	—	100	—

METHODS: EPA SW 846-2.1.3, 2.1.2, 1010.
CHEMIST: JG

Director, Dr. Blair Leftwich

10-25-97
DATE

ID:
JAN 06'98 8:18 No.001 P.06

83496

Page ____ of ____

TraceAnalysis, Inc.

6701 Aberdeen Avenue, Ste. 9 Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

LAB Order ID # 288

Company Name: (WEC) WESTERN ENVIRONMENTAL CONSULTANTS Phone #: 505-392-5021
Address: P.O. BOX 1816 Hobbs, NM 88241 Fax #: 505-392-9376
Contact Person: ALLEN Hodge / LG&E NATURAL
Invoice to: (If different from above) NE. CARLSBAD COMPRESSOR STA.
Project #: #1035 Project Name: NON-EXEMPT RAIN/WASH WATER TANK
Project Location: BERTON FLATS Sampler Signature:

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	SAMPLING: DATE	TIME
83496	RAIN/WASH WATER TANK	2	40ml	X						X		10-16-97	3:10
		1	QT	X						X		10-16-97	3:15

ANALYSIS REQUEST (Circle or Specify Method No.)

MTBE 8020/602 | BTEX 8020/602 | TPH | RAH 8270 | Total Metals Ag As Ba Cd Cr Pb Hg Se | TCLP Metals Ag As Ba Cd Cr Pb Hg Se | TCLP Volatiles | TCLP Semi Volatiles | RCI | GC/MS Vol. 8240/8260/624 | GC/MS Semi. Vol. 8270/625 | PCB's 8080/608 | Pest. 8080/608 | BOD, TSS, PH | Turn Around Time if different from standard | Hold

TCLP Metals Ag As Ba Cd Cr Pb Hg Se: X
TCLP Volatiles: X
TCLP Semi Volatiles: X
RCI: X

10 Days
10 Work.

Received Hobbs OCD NOV 03 1997

Relinquished by: Date: 10-16-97 Time: 3:15 PM
Received by: Date: Time:
Relinquished by: Date: Time:
Received by: Date: Time:
Relinquished by: Date: Time:
Received at Laboratory by: Date: 10-16-97 Time: 3:15 PM

LAB USE ONLY
Intact Y / N
Headspace Y / N
Temp 11 °
Log-in Review

REMARKS:
10-30

289 AQ

Carrier #

Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C.O.C.

JAN 06 '98 8:19 No.001 P.07
ID:

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-1
Originated 8/

RECEIVED
JAN 21 1998
Environmental Bureau
Oil Conservation Division

Submit Orig
Plus 1 C
to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator LG & e Natural
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Apex Station
2. Management Facility Destination Controled Recovery, Inc.	6. Transporter Rowland
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 921 Sanger Hobbs	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the L G & E Natural Hobbs Plant Apex Station. The waste was generated rain water caught Apex Station contaminated skids. I have included a certificate of waste and a chain of custody. This material has been approved in the past.

01-010

JAN 1998
Received
Hobbs
OCD

Estimated Volume 100 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Office Manager DATE: 01/07/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENV ENGR DATE: 1/16/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 1/21/98

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR L G & E Natural

ADDRESS 921 West Sanger Hobbs, New Mexico

GENERATING SITE Apex Station

COUNTY Lea STATE New Mexico

TYPE OF WASTE Rain water

ESTIMATED VOLUME 100 bbls

GENERATING PROCESS rain water caught from Apex station contaminated skids

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY Rowland Trucking

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT _____
SIGNATURE

NAME Ed Sloman
PRINTED

ADDRESS 921 Wesst Sanger Hobbs, New Mexico

DATE 01/07/98

JAN 1998
Received
Hobbs
OCD

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1816
HOBBS, NM 88241
FAX TO: 505-397-2597

Receiving Date: 08/08/97
Reporting Date: 08/12/97
Project Number: LG&E NAT. GAS
Project Name: APEX STATION
Project Location: HOBBS PLANT
Lab Number: H3115-1
Sample ID: SHOP OIL/RAIN WATER TANK

Analysis Date: 08/11/97
Sampling Date: 08/08/97
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

TCLP VOLATILES (ppm)	EPA LIMIT	Sample Result H3115-1	Method Blank	QC	%Recov.	True Value QC
Vinyl Chloride	0.20	<0.005	<0.005	0.102	102	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.106	106	0.100
Methyl Ethyl Ketone	200	0.593	<0.050	0.106	106	0.100
Chloroform	6.0	<0.005	<0.005	0.100	100	0.100
1,2-Dichloroethane	0.5	<0.005	<0.005	0.102	102	0.100
Benzene	0.5	0.006	<0.005	0.107	107	0.100
Carbon Tetrachloride	0.5	<0.005	<0.005	0.106	106	0.100
Trichloroethylene	0.5	<0.005	<0.005	0.103	103	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.103	103	0.100
Chlorobenzene	100	<0.005	<0.005	0.101	101	0.100
1,4-Dichlorobenzene	7.5	<0.005	<0.005	0.099	99	0.100

	% RECOVERY
Dibromofluoromethane	82
Toluene-d8	94
Bromofluorobenzene	83

METHODS: EPA SW 846-8260, 1311

Burgess J. A. Cooke, Ph. D.

6/12/97
Date

JAN 1998 Received Hobbs OCD

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ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1816
HOBBS, NM 88241
FAX TO: 505-397-2597

Receiving Date: 08/08/97
Reporting Date: 08/09/97
Project Number: LG&E NAT. GAS
Project Name: APEX STATION
Project Location: HOBBS PLANT
Lab Number: H3115-1
Sample ID: SHOP OIL/RAIN WATER TANK

Analysis Date: 08/09/97
Sampling Date: 08/08/97
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Sample Result H3115-1	Method Blank	QC	% Recov.	True Value QC
Pyridine	5.00	<0.008	<0.002	0.047	47	0.100
1,4-Dichlorobenzene	7.50	<0.008	<0.002	0.051	51	0.100
o-Cresol	200	<0.008	<0.002	0.085	85	0.100
m, p-Cresol	200	0.236	<0.002	0.158	79	0.200
Hexachloroethane	3.00	<0.008	<0.002	0.052	52	0.100
Nitrobenzene	2.00	<0.008	<0.002	0.088	88	0.100
Hexachloro-1,3-butadiene	0.500	<0.008	<0.002	0.058	58	0.100
2,4,6-Trichlorophenol	2.00	<0.008	<0.002	0.098	98	0.100
2,4,5-Trichlorophenol	400	<0.008	<0.002	0.102	102	0.100
2,4-Dinitrotoluene	0.130	<0.008	<0.002	0.104	104	0.100
Hexachlorobenzene	0.130	<0.008	<0.002	0.102	102	0.100
Pentachlorophenol	100	<0.008	<0.002	0.104	104	0.100

	% RECOVERY
Fluorophenol	46
Phenol-d5	94
Nitrobenzene-d5	102
2-Fluorobiphenyl	89
2,4,6-Tribromophenol	87
Terphenyl-d14	106

METHODS: EPA SW 846-8270, 1311

JAN 1998 Received Hobbs OCD

Burgess J. A. Cooke, Ph. D.

9/9/97
Date

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

ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1616
HOBBS, NM 88241
FAX TO: 505-397-2597

Receiving Date: 08/08/97
Reporting Date: 08/12/97
Project Number: LG&E NAT. GAS
Project Name: APEX STATION
Project Location: HOBBS PLANT

Sampling Date: 08/08/97
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: GP

TCLP METALS

LAB NO.	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:		08/09/97	08/09/97	08/09/97	08/09/97	08/09/97	08/09/97	08/11/97	08/09/97
EPA LIMITS:		5	5	100	1	5	5	0.2	1
H3115-1	SHOP OIL/RAIN WATER TANK	<1	<1	<5	<0.1	<1	<1	<0.02	<0.1
Quality Control		0.093	1.04	19.70	1.001	0.99	2.05	0.0091	0.092
True Value QC		0.100	1.00	20.00	1.000	1.00	2.00	0.0100	0.100
% Recovery		93	104	98	99	99	103	91	92
Relative Standard Deviation		1.4	0.7	11.5	1.2	0.8	1.1	1.8	2.4
METHODS: EPA 1311, 600/4-91/0		206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2

Gayle A. Potter, Chemist

JAN 1998
Received
Hobbs
OCD

Date 08/13/97

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CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1816
HOBBS, NM 88241
FAX TO: 505-397-2597

Receiving Date: 08/08/97
Reporting Date: 08/14/97
Project Number: LG&E NAT. GAS
Project Name: APEX STATION
Project Location: HOBBS PLANT

Sampling Date: 08/08/97
Sample Type: LIQUID
Sample Condition: COOL, INTAC
Sample Received By: BC
Analyzed By: BC/GP

LAB NUMBER	SAMPLE ID	REACTIVITY Sulfide (ppm)	REACTIVITY Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY (°F)
ANALYSIS DATE:		8/9/97	8/9/97	8/13/97	8/13/97
H3115-1	SHOP OIL/RAIN WATER TANK	<50	<50	6.31	>140
Quality Control		NR	0.105	7.02	NR
True Value QC		NR	0.100	7.00	NR
% Accuracy		NR	105	100	NR
Relative Percent Difference		NR	0	0.2	NR

METHOD: EPA SW 846-7.3, 7.2, 1010, 1311, *40 CFR 261*

Chemist

JAN 1998
Received
Hobbs
OCD

08/14/97
Date

PLEASE NOTE: Liability 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, 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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page ___ of ___

H 3115

Company Name: WEC	BILL TO: PO #: Consultants
Project Manager: Allen Hodge	Company: Western Environmental
Address: P.O. Box 1816	Attn: Allen Hodge
City: Hobbs State: NM Zip: 88241	Address: P.O. Box 1816
Phone #: 392-5021	City: Hobbs.
Fax #: 397-2597	State: N M Zip: 8 8241
Project #: LEASE NAT.	Phone #: 505 392 5021
Project Name: APEX STATION	Fax #: 505 397 2597
Project Location: Hobbs PLANT	

LAB I.D. #	Sample I.D.	COMP(C) OR GRAB(G)	# CONTAINERS	MATRIX: GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	PRESERVATIVE: ACID:	ICE / COOL	OTHER:	SAMPLING: DATE	TIME	ANALYSIS REQUEST: TCLP VOL	TCLP SVI	TCLP METALS	RCI
H-3115-1	SLOP OIL/RAIN WATER TANK	G	3		X						X		8-8-97	4:30 PM				

Received JAN 1998 Hobbs OCD

PLEASE NOTE: Liability 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, 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.

Sampler Relinquished:	Date: 8-8-97 Time: 4:30 PM	Received By:	Phone Result: ☐ Yes ☐ No Additional Fax #:
Relinquished By:	Date: Time:	Received By: (Lab Staff)	Fax Results: ☐ Yes ☐ No
Delivered By: (Circle One) UPS - Fed Ex - Bus - Other:	Sample Condition: Cool: ☒ Yes ☐ No Intact: ☒ Yes ☐ No	CHECKED BY: (Initials)	REMARKS: THIS SAMPLE WAS TAKEN FROM THE SLOP OIL/RAIN WATER TANK THAT RAN OVER.

PAGE 11

HOBBS PLANT

08/08/1997 13:09 3053974139

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
JAN 21 1998
Environmental Bureau
Oil Conservation Division

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator LG & e Natural
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Apex Station
2. Management Facility Destination Controled Recovery, Inc.	6. Transporter Rowland
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 921 Sanger Hobbs	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the L G & E Natural Hobbs Plant Apex Station. The waste was generated rain water caught Apex Station contaminated skids. I have included a certificate of waste and a chain of custody. This material has been approved in the past.

01-011

JAN 1998
Received
Hobbs
OCD

Estimated Volume 100 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo Waste Management Facility Authorized Agent TITLE: Office Manager DATE: 01/07/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env Engr DATE: 1/16/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 1/21/98

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR L G & E Natural

ADDRESS 921 West Sanger Hobbs, New Mexico

GENERATING SITE Apex Station

COUNTY Lea STATE New Mexico

TYPE OF WASTE Rain water

ESTIMATED VOLUME 100 bbls

GENERATING PROCESS rain water caught from Apex station contaminated skids

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY Rowland Trucking

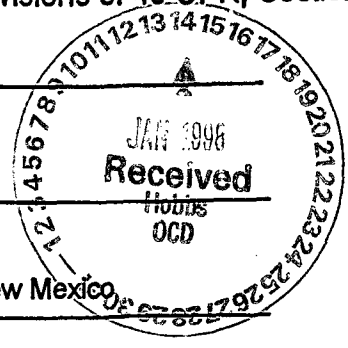
As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT _____
SIGNATURE

NAME Ed Sloman
PRINTED

ADDRESS 921 Wesst Sanger Hobbs, New Mexico

DATE 01/07/98



CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1816
HOBBS, NM 88241
FAX TO: 505-397-2597

Receiving Date: 08/08/97
Reporting Date: 08/12/97
Project Number: LG&E NAT. GAS
Project Name: APEX STATION
Project Location: HOBBS PLANT
Lab Number: H3115-1
Sample ID: SHOP OIL/RAIN WATER TANK

Analysis Date: 08/11/97
Sampling Date: 08/08/97
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

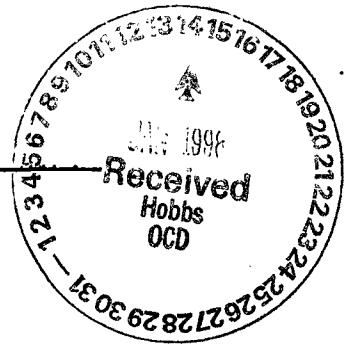
TCLP VOLATILES (ppm)	EPA LIMIT	Sample Result H3115-1	Method Blank	QC	%Recov.	True Value QC
Vinyl Chloride	0.20	<0.005	<0.005	0.102	102	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.106	106	0.100
Methyl Ethyl Ketone	200	0.593	<0.050	0.106	106	0.100
Chloroform	6.0	<0.005	<0.005	0.100	100	0.100
1,2-Dichloroethane	0.5	<0.005	<0.005	0.102	102	0.100
Benzene	0.5	0.006	<0.005	0.107	107	0.100
Carbon Tetrachloride	0.5	<0.005	<0.005	0.106	106	0.100
Trichloroethylene	0.5	<0.005	<0.005	0.103	103	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.103	103	0.100
Chlorobenzene	100	<0.005	<0.005	0.101	101	0.100
1,4-Dichlorobenzene	7.5	<0.005	<0.005	0.099	99	0.100

	% RECOVERY
Dibromofluoromethane	82
Toluene-d8	94
Bromofluorobenzene	83

METHODS: EPA SW 846-8260, 1311

Burgess J. A. Cooke, Ph. D.

6/12/97
Date



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ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1816
HOBBS, NM 88241
FAX TO: 505-397-2597

Receiving Date: 08/08/97
Reporting Date: 08/09/97
Project Number: LG4E NAT. GAS
Project Name: APEX STATION
Project Location: HOBBS PLANT
Lab Number: H3115-1
Sample ID: SHOP OIL/RAIN WATER TANK

Analysis Date: 08/09/97
Sampling Date: 08/08/97
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Sample Result H3115-1	Method Blank	QC	% Recov.	True Value QC
Pyridine	5.00	<0.008	<0.002	0.047	47	0.100
1,4-Dichlorobenzene	7.50	<0.008	<0.002	0.051	51	0.100
o-Cresol	200	<0.008	<0.002	0.085	85	0.100
m, p-Cresol	200	0.236	<0.002	0.158	79	0.200
Hexachloroethane	3.00	<0.008	<0.002	0.052	52	0.100
Nitrobenzene	2.00	<0.008	<0.002	0.088	88	0.100
Hexachloro-1,3-butadiene	0.500	<0.008	<0.002	0.058	58	0.100
2,4,6-Trichlorophenol	2.00	<0.008	<0.002	0.098	98	0.100
2,4,5-Trichlorophenol	400	<0.008	<0.002	0.102	102	0.100
2,4-Dinitrotoluene	0.130	<0.008	<0.002	0.104	104	0.100
Hexachlorobenzene	0.130	<0.008	<0.002	0.102	102	0.100
Pentachlorophenol	100	<0.008	<0.002	0.104	104	0.100

	% RECOVERY
Fluorophenol	46
Phenol-d5	94
Nitrobenzene-d5	102
2-Fluorobiphenyl	89
2,4,6-Tribromophenol	87
Terphenyl-d14	106

METHODS: EPA SW 846-8270, 1311

Burgess J. A. Cooke, Ph. D.

9/4/97
Date

JAN 1998
Received
Hobbs
OCD

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ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1616
HOBBS, NM 88241
FAX TO: 505-397-2597

Receiving Date: 08/08/97
Reporting Date: 08/12/97
Project Number: LG&E NAT. GAS
Project Name: APEX STATION
Project Location: HOBBS PLANT

Sampling Date: 08/08/97
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: GP

TCLP METALS

LAB NO.	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:		08/09/97	08/09/97	08/09/97	08/09/97	08/09/97	08/09/97	08/11/97	08/09/97
EPA LIMITS:		5	5	100	1	5	5	0.2	1
H3115-1	SHOP OIL/RAIN WATER TANK	<1	<1	<5	<0.1	<1	<1	<0.02	<0.1
Quality Control		0.093	1.04	19.70	1.001	0.99	2.05	0.0091	0.092
True Value QC		0.100	1.00	20.00	1.000	1.00	2.00	0.0100	0.100
% Recovery		93	104	98	99	99	103	91	92
Relative Standard Deviation		1.4	0.7	11.5	1.2	0.8	1.1	1.6	2.4
METHODS: EPA 1311, 600/4-91/0		206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2

Gayle A. Potter, Chemist

08/13/97
Date

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

ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1616
HOBBS, NM 88241
FAX TO: 505-397-2597

Receiving Date: 08/08/97
Reporting Date: 08/14/97
Project Number: LG&E NAT. GAS
Project Name: APEX STATION
Project Location: HOBBS PLANT

Sampling Date: 08/08/97
Sample Type: LIQUID
Sample Condition: COOL, INTAC
Sample Received By: BC
Analyzed By: BC/GP

LAB NUMBER	SAMPLE ID	REACTIVITY Sulfide (ppm)	Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY (°F)
ANALYSIS DATE:		8/9/97	8/9/97	8/13/97	8/13/97
H3115-1	SHOP OIL/RAIN WATER TANK	<50	<50	6.31	>140
Quality Control		NR	0.105	7.02	NR
True Value QC		NR	0.100	7.00	NR
% Accuracy		NR	105	100	NR
Relative Percent Difference		NR	0	0.2	NR

METHOD: EPA SW 846-7.3, 7.2, 1010, 1311, *40 CFR 261*

AUG 1997
Received
Hobbs
OCD

Chemist

08/14/97
Date

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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

H 3115

Page ___ of ___

Company Name: WEC	BILL TO: PO #: Consultants
Project Manager: Allen Hodge	Company: Western Environmental
Address: P.O. Box 1816	Attn: Allen Hodge
City: Hobbs State: NM Zip: 88241	Address: P.O. Box 1816
Phone #: 392-5021	City: Hobbs.
Fax #: 397-2597	State: N M Zip: 8 8241
Project #: L66E NAT.	Phone #: 505 392 5021
Project Name: APEX STATION	Fax #: 505 397 2597
Project Location: Hobbs PLANT	

LAB I.D. #	Sample I.D.	COMP(C) OR GRAB(G)	# CONTAINERS	MATRIX: GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	PRESERVATIVE: ACID:	ICE / COOL	OTHER:	SAMPLING DATE	SAMPLING TIME	ANALYSIS REQUEST: TCLP VOL	TCLP SVOL	TCLP METALS	RCI
H-3115-1	SLOP OIL/RAIN WATER TANK	C	3		X						X		8-8-97	4:00 PM	X	X	X	X

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Sampler Relinquished:	Date: 8-8-97	Received By:	Phone Result: ☐ Yes ☐ No Additional Fax #:
	Time: 4:30		Fax Results: ☐ Yes ☐ No
Relinquished By:	Date:	Received By: (Lab Staff)	REMARKS: THIS SAMPLE WAS TAKEN FROM THE SLOP OIL/RAIN WATER TANK THAT RAN OVER.
	Time:		
Delivered By: (Circle One) UPS - Fed Ex - Bus - Other:		Sample Condition: Cool: ☒ Yes ☐ No Intact: ☒ Yes ☐ No	CHECKED BY: (Initials)

Received JAN 1998 Hobbs OCD

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
JAN 21 1998
Environmental Bureau
Oil Conservation Division

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator LG & e Natural
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Hobbs Plant
2. Management Facility Destination Controled Recovery, Inc.	6. Transporter Rowland
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 921 Sanger Hobbs	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the L G & E Natural Hobbs Plant. The waste was generated by rain water caught from rain water caught from plant. I have inlcuded a certificat of waste and a chain of custody. This material has been approved in the past.

01-008

JAN 1998 Received Hobbs OCD

Estimated Volume 100 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo Waste Management FacilityAuthorized Agent TITLE: Office Manager DATE: 01/07/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR BUR DATE: 1/16/98

APPROVED BY: Matthew J. Kirby TITLE: Env Geologist DATE: 1/21/98

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR L G & E Natural

ADDRESS 921 West Sanger Hobbs, New Mexico

GENERATING SITE Hobbs Plant

COUNTY Lea STATE New Mexico

TYPE OF WASTE Rain water

ESTIMATED VOLUME 100 bbls

GENERATING PROCESS Rain water caught from plant comtaminated skids

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY Rowland Trucking

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT _____
SIGNATURE

NAME Ed Sloman
PRINTED

ADDRESS 921 Wesst Sanger Hobbs, New Mexico

JAN 1998 Received Hobbs OCD

DATE 01/07/98

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240
PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1616
HOBBS, NM 88241
FAX TO:

Receiving Date: 01/28/97
Reporting Date: 01/29/97
Project Number: NOT GIVEN
Project Name: LG & E
Project Location: HOBBS PLANT, OPEN TOP TANK
Lab Number: H2769-1
Sample ID: COMPOSITE, OPEN TOP TANK

Analysis Date: 01/29/97
Sampling Date: 01/28/97
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

TCLP VOLATILES (ppm)	EPA LIMIT	Sample Result H2769-1	Method Blank	QC	%IA	True Value QC
Vinyl Chloride	0.20	<0.005	<0.005	0.119	119	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.095	95	0.100
Methyl Ethyl Ketone	200	<0.005	<0.005	0.086	86	0.100
Chloroform	6.0	<0.005	<0.005	0.106	106	0.100
1,2-Dichloroethane	0.5	<0.005	<0.005	0.113	113	0.100
Benzene	0.5	0.036	<0.005	0.110	110	0.100
Carbon Tetrachloride	0.5	<0.005	<0.005	0.113	113	0.100
Trichloroethylene	0.5	<0.005	<0.005	0.107	107	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.094	94	0.100
Chlorobenzene	100	<0.005	<0.005	0.109	109	0.100
1,4-Dichlorobenzene	7.5	<0.005	<0.005	0.113	113	0.100

	% RECOVERY
Dibromofluoromethane	87
Toluene-d8	88
Bromofluorobenzene	88

METHODS: EPA SW 846-8260

Burgess J. A. Copke, Ph. D.

1/29/97
Date

JAN 1996
Received
Hobbs
OCD

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ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1616
HOBBS, NM 88241
FAX TO:

Receiving Date: 01/28/97
Reporting Date: 01/31/97
Project Number: NOT GIVEN
Project Name: LG & E
Project Location: HOBBS PLANT, OPEN TOP TANK
Lab Number: H2769-1
Sample ID: COMPOSITE, OPEN TOP TANK

Analysis Date: 01/30/97
Sampling Date: 01/28/97
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Sample Result H2769-1	Method Blank	QC	%IA	True Value QC
Pyridine	5.00	<0.005	<0.005	0.048	96	0.050
1,4-Dichlorobenzene	7.50	<0.005	<0.005	0.051	102	0.050
o-Cresol	200	0.023	<0.005	0.047	94	0.050
m, p-Cresol	200	0.015	<0.005	0.054	108	0.050
Hexachloroethane	3.00	<0.005	<0.005	0.050	100	0.050
Nitrobenzene	2.00	<0.005	<0.005	0.048	96	0.050
Hexachloro-1,3-butadiene	0.500	<0.005	<0.005	0.051	102	0.050
2,4,6-Trichlorophenol	2.00	<0.005	<0.005	0.050	100	0.050
2,4,5-Trichlorophenol	400	<0.005	<0.005	0.049	98	0.050
2,4-Dinitrotoluene	0.130	<0.005	<0.005	0.045	90	0.050
Hexachlorobenzene	0.130	<0.005	<0.005	0.051	102	0.050
Pentachlorophenol	100	<0.005	<0.005	0.047	94	0.050

	% RECOVERY
Fluorophenol	26
Phenol-d5	27
Nitrobenzene-d5	53
2-Fluorobiphenyl	66
2,4,6-Tribromophenol	44
Terphenyl-d14	87

METHODS: EPA SW 846-8270

Received
Hobbs
OCD

Burgess J. A. Cooke, Ph. D.

1/31/97
Date

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PHONE (505) 326-4669 • 116 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1616
HOBBS, NM 88241
FAX TO:

Receiving Date: 01/28/97
Reporting Date: 02/17/97
Project Number: NOT GIVEN
Project Name: LG & E
Project Location: HOBBS PLANT, OPEN TOP TANK

Sampling Date: 01/28/97
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: WL/GP

TCLP METALS

LAB NUMBER	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:		2/7/97	2/12/97	2/15/97	2/12/97	2/10/97	2/12/97	2/14/97	2/7/97
EPA LIMITS:		5	5	100	1	5	5	0.2	1
H2769-1	COMPOSITE, OPEN TOP TANK	<0.02	<0.1	0.41	<0.1	<0.5	<1	<0.02	<0.02
Quality Control		10.3	0.495	10.01	0.541	0.916	0.86	0.101	9.9
True Value QC		10.0	0.500	10.00	0.500	1.000	1.00	0.100	10.0
% Recovery		103	99.0	100	108	91.6	86.0	99.0	99.0
Relative Percent Difference		14	0.4	2.4	0.1	1.1	5.6	14	10
METHODS: EPA 1311, 600/4-78/02		206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.1

Received
Hobbs
NM

Chemist

02/17/97
Date

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PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1816
HOBBS, NM 88241
FAX TO:

Receiving Date: 01/28/97
Reporting Date: 02/10/97
Project Number: NOT GIVEN
Project Name: LG & E
Project Location: HOBBS PLANT, OPEN TOP TANK

Sampling Date: 01/28/97
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC/GP

LAB NUMBER	SAMPLE ID	REACTIVITY Sulfide (ppm)	REACTIVITY Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY (°F)
ANALYSIS DATE:		2/8/97	2/8/97	1/28/97	2/1/97
H2769-1	COMPOSITE, OPEN TOP TANK	<50	<50	8.68	>140
Quality Control		NR	0.105	7.03	NR
True Value QC		NR	0.100	7.00	NR
% Recovery		NR	105	100	NR
Relative Percent Difference		NR	4.8	0.03	NR

METHOD: EPA SW 846-7.3, 7.2, 1010

Chemist

02/10/97
Date

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Environmental Analytical Services

ARDINAL LABORATORIES

118 S. Commercial Ave.
Farmington, NM 87401
505-326-4669
FAX 505-326-4535

101 E. Marland
Hobbs, NM 88240
505-393-2326
FAX 505-393-2476

H2769-1

Chain of Custody Record

Project I.D. L G + E

Project Location Hobbs PLANT OPEN TOP TANK

Sampled By A. Hodges

Client Name WESTERN ENVIRONMENTAL

Address P.O. BOX 1816 Hobbs NM 88241

Telephone 505-392-5021 FAX 505-397-2597

Sample Number	Date	Time	Composite	Grab	Sample Location	Number of Containers	Analysis Required: TCLP VOL.	TCLP SEMI VOL	TCLP METALS	RCI			Remarks (Type sample, preservation, etc.)
1	1/4/94	300	X		COMPOSITE FROM OPEN TOP TANK	4	X	X	X	X			SAMPLE TYPE LIQUID PRESERVATION NONE SAMPLE WAS TAKEN FROM TOP TO BOTTOM WITH A COLIWASA

Relinquished by: (Signature)	Date	Time	Received by: (Signature)
	1/4/94	5:20	
Relinquished by: (Signature)	Date	Time	Received by: (Signature)

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HOBBS PLANT
5053972793
02/06/1994 15:05

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Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
JAN 21 1998
Environmental Bureau
Oil Conservation Division

Form C-1
Originated 8/

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to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator LG & e Natural
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Hobbs Plant
2. Management Facility Destination Controled Recovery, Inc.	6. Transporter Rowland
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 921 Sanger Hobbs	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the L G & E Natural Hobbs Plant. The waste was generated by rain water caught from rain water caught from plant. I have inlcuded a certificat of waste and a chain of custody. This material has been approved in the past.

01-009

JAN 1998
Received
Hobbs
OCD

Estimated Volume 100 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Office Manager DATE: 01/07/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Envir Engr DATE: 1/16/98

APPROVED BY: Martyn J Kitty TITLE: Env Geologist DATE: 1/21/98

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR L G & E Natural

ADDRESS 921 West Sanger Hobbs, New Mexico

GENERATING SITE Hobbs Plant

COUNTY Lea STATE New Mexico

TYPE OF WASTE Rain water

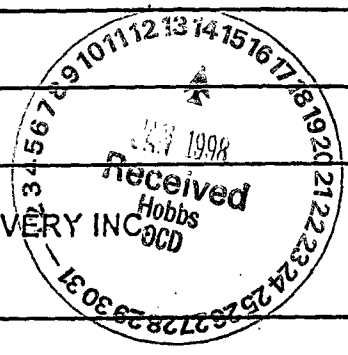
ESTIMATED VOLUME 100 bbls

GENERATING PROCESS Rain water caught from plant comtaminated skids

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC

TRUCKING COMPANY Rowland Trucking



As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT _____
SIGNATURE

NAME Ed Sloman
PRINTED

ADDRESS 921 Wesst Sanger Hobbs, New Mexico

DATE 01/07/98

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ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1816
HOBBS, NM 88241
FAX TO:

Receiving Date: 01/28/97
Reporting Date: 01/29/97
Project Number: NOT GIVEN
Project Name: LG & E
Project Location: HOBBS PLANT, OPEN TOP TANK
Lab Number: H2769-1
Sample ID: COMPOSITE, OPEN TOP TANK

Analysis Date: 01/29/97
Sampling Date: 01/28/97
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

TCLP VOLATILES (ppm)	EPA LIMIT	Sample Result H2769-1	Method Blank	QC	%IA	True Value QC
Vinyl Chloride	0.20	<0.005	<0.005	0.119	119	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.095	95	0.100
Methyl Ethyl Ketone	200	<0.005	<0.005	0.086	86	0.100
Chloroform	6.0	<0.005	<0.005	0.106	106	0.100
1,2-Dichloroethane	0.5	<0.005	<0.005	0.113	113	0.100
Benzene	0.5	0.036	<0.005	0.110	110	0.100
Carbon Tetrachloride	0.5	<0.005	<0.005	0.113	113	0.100
Trichloroethylene	0.5	<0.005	<0.005	0.107	107	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.094	94	0.100
Chlorobenzene	100	<0.005	<0.005	0.109	109	0.100
1,4-Dichlorobenzene	7.5	<0.005	<0.005	0.113	113	0.100

	% RECOVERY
Dibromofluoromethane	87
Toluene-d8	88
Bromofluorobenzene	88

METHODS: EPA SW 846-8260

Burgess J. A. Cooke, Ph. D.

1/29/97
Date

JAN 1998 Received Hobbs OCD

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ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1616
HOBBS, NM 88241
FAX TO:

Receiving Date: 01/28/97
Reporting Date: 01/31/97
Project Number: NOT GIVEN
Project Name: LG & E
Project Location: HOBBS PLANT, OPEN TOP TANK
Lab Number: H2769-1
Sample ID: COMPOSITE, OPEN TOP TANK

Analysis Date: 01/30/97
Sampling Date: 01/28/97
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Sample Result H2769-1	Method Blank	QC	%IA	True Value QC
Pyridine	5.00	<0.005	<0.005	0.048	96	0.050
1,4-Dichlorobenzene	7.50	<0.005	<0.005	0.051	102	0.050
o-Cresol	200	0.023	<0.005	0.047	94	0.050
m, p-Cresol	200	0.015	<0.005	0.054	108	0.050
Hexachloroethane	3.00	<0.005	<0.005	0.050	100	0.050
Nitrobenzene	2.00	<0.005	<0.005	0.048	96	0.050
Hexachloro-1,3-butadiene	0.500	<0.005	<0.005	0.051	102	0.050
2,4,6-Trichlorophenol	2.00	<0.005	<0.005	0.050	100	0.050
2,4,5-Trichlorophenol	400	<0.005	<0.005	0.049	98	0.050
2,4-Dinitrotoluene	0.130	<0.005	<0.005	0.045	90	0.050
Hexachlorobenzene	0.130	<0.005	<0.005	0.051	102	0.050
Pentachlorophenol	100	<0.005	<0.005	0.047	94	0.050

	% RECOVERY
Fluorophenol	28
Phenol-d5	27
Nitrobenzene-d5	53
2-Fluorobiphenyl	66
2,4,6-Tribromophenol	44
Terphenyl-d14	87

METHODS: EPA SW 846-8270

JAN 1998
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Burgess J. A. Cooke, Ph. D.

1/31/97
Date

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ANALYTICAL RESULTS FOR
WESTERN ENVIRONMENTAL CONSULTANTS
ATTN: ALLEN HODGE
P.O. BOX 1816
HOBBS, NM 88241
FAX TO:

Receiving Date: 01/28/97
Reporting Date: 02/17/97
Project Number: NOT GIVEN
Project Name: LG & E
Project Location: HOBBS PLANT, OPEN TOP TANK

Sampling Date: 01/28/97
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: WL/GP

TCLP METALS

LAB NUMBER	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:		2/7/97	2/12/97	2/15/97	2/12/97	2/10/97	2/12/97	2/14/97	2/7/97
EPA LIMITS:		5	5	100	1	5	5	0.2	1
H2769-1	COMPOSITE, OPEN TOP TANK	<0.02	<0.1	0.41	<0.1	<0.5	<1	<0.02	<0.02
Quality Control		10.3	0.495	10.01	0.541	0.916	0.86	0.101	9.9
True Value QC		10.0	0.500	10.00	0.500	1.000	1.00	0.100	10.0
% Recovery		103	99.0	100	108	91.6	86.0	99.0	99.0
Relative Percent Difference		14	0.4	2.4	0.1	1.1	15.6	14	10
METHODS: EPA 1311, 600/4-78/02		206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.1

Received
Hobbs
OCD

Chemist

Date

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FAX TO:

Receiving Date: 01/28/97
Reporting Date: 02/10/97
Project Number: NOT GIVEN
Project Name: LG & E
Project Location: HOBBS PLANT, OPEN TOP TANK

Sampling Date: 01/28/97
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC/GP

LAB NUMBER	SAMPLE ID	REACTIVITY Sulfide (ppm)	REACTIVITY Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY (°F)
ANALYSIS DATE:		2/6/97	2/6/97	1/28/97	2/1/97
H2769-1	COMPOSITE, OPEN TOP TANK	<50	<50	8.66	>140
Quality Control		NR	0.105	7.03	NR
True Value QC		NR	0.100	7.00	NR
% Recovery		NR	105	100	NR
Relative Percent Difference		NR	4.8	0.03	NR

METHOD: EPA SW 846-7.3, 7.2, 1010

JAN 1998 Received Hobbs OCD

Chemist

02/10/97
Date

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H2769.XLS

PAGE 06
HOBBS PLANT
5053972793
02/06/1994 19:05

Environmental Analytical Services

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FAX 505-326-4535

101 E. Marland
Hobbs, NM 88240
505-393-2326
FAX 505-393-2476

H2769-1

Chain of Custody Record

Project I.D. L G + E
Project Location Hobbs PLANT open TOP TANK
Sampled By A. Hodge
Client Name WESTERN ENVIRONMENTAL
Address P.O. BOX 1816 Hobbs NM 88241
Telephone 505-392-5021 FAX 505-397-2597

Sample Number	Date	Time	Composite	Grab	Sample Location	Number of Containers	Analysis Required: TCLP VOL.	TCLP SEMI VOL	TCLP METALS	RCI	Remarks (Type sample, preservation, etc.)
1	1/26/94	3:00	X		COMPOSITE FROM OPEN TOP TANK	4	X	X	X	X	SAMPLE TYPE: LIQUID; PRESERVATION: ICE; SAMPLE WAS TAKEN FROM TOP TO BOTTOM WITH A COLIWASA

Received by OCD Hobbs JAN 1998

Released by: (Signature)	Date	Time	Received by: (Signature)
	1/26/94	5:20	
Released by: (Signature)	Date	Time	Received by: (Signature)

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Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Originated By

Submit Orig Plus 1 C to approp District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Verbal Approval Received: Yes ☐ No ☐	4. Generator Air Liquid
	5. Originating Site Hobbs
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Globe Construction
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR)	2633 Enterprise Dr. Hobbs, NM

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.
B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Air Liquid Hobbs yard. The waste was generated by the excavation of oil and water separator at oil tool rental facility. I have included a certificate of waste and a chain of custody

01-003

JAN 1998 Received Hobbs OCD

Estimated Volume 130 cubic yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE [signature] Waste Management Facility/Authorized Agent TITLE Office Manager DATE 01/12/98

TYPE OR PRINT NAME Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY [signature] TITLE Envir. Supv. DATE 1/16/98

APPROVED BY Martyna J. Kielty TITLE Env. Geologist DATE 1/21/98

Sent by fax 1/12/98

March 13, 1998

Mr. Ken Marsh
Controlled Recovery, Inc.
P.O. Box 369
Hobbs, NM 88241

Re: C-138 Weatherford Enterra-Snyder facility dated 3/09/98.

Dear Mr. Marsh:

Please find enclosed the above referenced C-138 returned for the following error and/or errors:

1. This document contained an analytical which revealed that the value of TCLP "lead" was 13 ppm which exceeds the limit of 5 ppm.

2. This document contains information from another site not listed or shown on the C-138.

The NMOCD is requesting that CRI perform a more detail critical review of these type submittals to prevent and/or decrease these type of errors which cost the NMOCD numerous man-hours and also increases the overall approval process for you and your client.

The NMOCD would appreciate any assistance you may provide in this manner and if you require any further information or assistance please do not hesitate to call (505-393-6161) or write this office.

Sincerely Yours,

Wayne Price-Environmental Engineer

cc: Chris Williams-NMOCD District I Supervisor
Martyne Kieling-Environmental Bureau, Santa Fe, NM
Roger Anderson-Environmental Bureau Chief, Santa Fe, NM

attachments- returned C-138

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Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
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New Mexico
Energy Minerals and Natural Resources Department
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2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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Environmental Bureau
Oil Conservation Division

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Originated 8/1

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to appropr
District Of

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Baker Oil Tools
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Hobbs Yard
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Rowland
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 507 W county Road Hobbs	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Baker Oil Tools Hobbs yard. The waste was generated by steaming tools. This material has been approved in the past. I have included a certificate of waste and a chain of custody.

03-004

MAR 1998
Received
Hobbs
OCD

Estimated Volume 60 BBLS cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: _____ TITLE: Environmental Compliance Manager DATE: 03/11/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env Engr DATE: 3/13/98

APPROVED BY: _____ TITLE: Env Ecologist DATE: 3/16/98

BAKER OIL TOOLS

FAX TRANSMITTAL MEMO

HOBBS, NEW MEXICO

Telephone: 505-397-3671 • Fax: 505-393-4213

Date:	3-16-98		
To:	Billie Charo	**From:**	Ray Dockery
Location:		**Ref:**	
Company:	CRI	**Subject:**	Sump disposal
Fax No.:	393-3615	**# pgs:(inc. this pg)**	2
Copy:			

The waste we are sending remains the same as previously tested.

Ray Dock

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR Baker Oil Tools

ADDRESS P O Box 1828 Hobbs, NM 88240

GENERATING SITE 507 West County Road Hobbs

COUNTY Lea **STATE** NM

TYPE OF WASTE Sump Water

ESTIMATED VOLUME 60 bbls

GENERATING PROCESS steaming tools

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY Rowland Trucking

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT Ray Dockery
SIGNATURE

NAME Ray Dockery
PRINTED

ADDRESS P O Box 1828

Hobbs, NM 88240

DATE 3-16-98

MAR 1998 Received Hobbs OCD

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
BAKER OIL TOOLS
ATTN: BILL RUSSELL
507 W. COUNTY ROAD
HOBBS, NM 88240
FAX TO: 505-393-4213

Receiving Date: 02/05/98
Reporting Date: 02/13/98
Project Number: NOT GIVEN
Project Name: WASH BAY
Project Location: HOBBS, NM

Sampling Date: 02/05/98
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: GP/AH

TCLP METALS

LAB NUMBER	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:		02/12/98	02/06/98	02/11/98	02/12/98	02/12/98	02/12/98	02/10/98	02/06/98
EPA LIMITS:		5	5	100	1	5	5	0.2	1
H3444-1	WASHBAY	<1	<1	<5	<0.1	<1	<1	<0.02	<0.01
Quality Control		0.095	2.358	4.945	2.025	5.026	5.006	0.0087	0.0485
True Value QC		0.100	2.500	5.000	2.000	5.000	5.000	0.0100	0.0500
% Recovery		95	94	99	101	101	100	87	97
Relative Standard Deviation		7.5	0.5	14.6	0.9	1.9	4.7	8.9	10.1

METHODS: EPA 1311, 600/4-91/0	206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2

Chemist

MAR 1998 Received Hobbs OCD

Date 2/13/98

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ANALYTICAL RESULTS FOR
BAKER OIL TOOLS
ATTN: BILL RUSSELL
507 W. COUNTY ROAD
HOBBS, NM 88240
FAX TO: 505-393-4213

Receiving Date: 02/05/98
Reporting Date: 02/07/98
Project Number: NOT GIVEN
Project Name: WASH BAY
Project Location: HOBBS, NM
Lab Number: H3444-1
Sample ID: WASH BAY

Analysis Date: 02/06/98
Sampling Date: 02/05/98
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC

TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Sample Result H3444-1	Method Blank	QC	% Recov.	True Value QC
Pyridine	5.00	<0.008	<0.002	0.028	28	0.100
1,4-Dichlorobenzene	7.50	<0.008	<0.002	0.052	52	0.100
o-Cresol	200	0.011	<0.002	0.055	55	0.100
m, p-Cresol	200	0.008	<0.002	0.115	58	0.200
Hexachloroethane	3.00	<0.008	<0.002	0.050	50	0.100
Nitrobenzene	2.00	<0.008	<0.002	0.079	79	0.100
Hexachloro-1,3-butadiene	0.500	<0.008	<0.002	0.063	63	0.100
2,4,6-Trichlorophenol	2.00	<0.008	<0.002	0.067	67	0.100
2,4,5-Trichlorophenol	400	<0.008	<0.002	0.072	72	0.100
2,4-Dinitrotoluene	0.130	<0.008	<0.002	0.106	106	0.100
Hexachlorobenzene	0.130	<0.008	<0.002	0.088	88	0.100
Pentachlorophenol	100	<0.008	<0.002	0.091	91	0.100

	% RECOVERY
Fluorophenol	29
Phenol-d5	29
Nitrobenzene-d5	71
2-Fluorobiphenyl	72
2,4,6-Tribromophenol	76
Terphenyl-d14	97

METHODS: EPA SW 846-8270, 1311, 3510

Burgess J. A. Cooke, Ph. D.

2/7/98
Date

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

ANALYTICAL RESULTS FOR
BAKER OIL TOOLS
ATTN: BILL RUSSELL
507 W. COUNTY ROAD
HOBBS, NM 88240
FAX TO: 505-393-4213

Receiving Date: 02/05/98
Reporting Date: 02/18/98
Project Number: NOT GIVEN
Project Name: WASH BAY
Project Location: HOBBS, NM

Sampling Date: 02/05/98
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC/HM

LAB NUMBER	SAMPLE ID	REACTIVITY Sulfide (ppm)	Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY (°F)
ANALYSIS DATE:		02/13/98	02/13/98	02/17/98	02/18/98
H3444-1	WASHBAY	<50	<50	7.26	>140
Quality Control		NR	0.105	7.01	NR
True Value QC		NR	0.100	7.00	NR
% Accuracy		NR	105	100	NR
Relative Percent Difference		NR	0	0.2	NR

METHOD: EPA SW 846-7.3, 7.2, 1010, 1311, *40 CFR 261*

MAR 1998 Received Hobbs OCD

Chemist

2/18/98
Date

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

ANALYTICAL RESULTS FOR
BAKER OIL TOOLS
ATTN: BILL RUSSELL
507 W. COUNTY ROAD
HOBBS, NM 88240
FAX TO: 505-393-4213

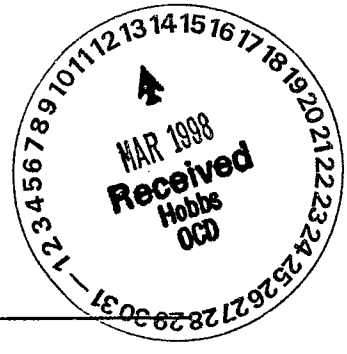
Receiving Date: 02/05/98
Reporting Date: 02/05/98
Project Number: NOT GIVEN
Project Name: WASH BAY
Project Location: HOBBS, NM
Lab Number: H3444-1
Sample ID: WASH BAY

Analysis Date: 02/05/98
Sampling Date: 02/05/98
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC

TCLP VOLATILES (ppm)	EPA LIMIT	Sample Result H3444-1	Method Blank	QC	%Recov.	True Value QC
Vinyl Chloride	0.20	<0.005	<0.005	0.103	103	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.087	87	0.100
Methyl Ethyl Ketone	200	0.055	<0.050	0.114	114	0.100
Chloroform	6.0	<0.005	<0.005	0.106	106	0.100
1,2-Dichloroethane	0.5	<0.005	<0.005	0.097	97	0.100
Benzene	0.5	0.009	<0.005	0.107	107	0.100
Carbon Tetrachloride	0.5	<0.005	<0.005	0.100	100	0.100
Trichloroethylene	0.5	<0.005	<0.005	0.112	112	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.095	95	0.100
Chlorobenzene	100	<0.005	<0.005	0.116	116	0.100
1,4-Dichlorobenzene	7.5	<0.005	<0.005	0.112	112	0.100

	% RECOVERY
Dibromofluoromethane	111
Toluene-d8	110
Bromofluorobenzene	97

METHODS: EPA SW 846-8260, 1311



Burgess J. A. Cooke, Ph. D.

2/5/98
Date

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CARDINAL LABORATORIES, INC.

2111 Beechwood, Abilene, TX 79603 (915) 673-7001 Fax (915) 673-7020
101 East Marland, Hobbs, NM 88240 (505) 393-2326 Fax (505) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page ____ of ____

Company Name:	BAKER OIL TOOLS	BILL TO	PO #:
Project Manager:	BILL RUSSELL	Company:	BAKER
Address:	507 W County Road	Attn:	
City:	HOBBS State: NM Zip: 88240	Address:	P.O. Box 1828
Phone #:	505-397-3671	City:	HOBBS
Fax #:	505-393-4213	State: NM	Zip:
Project #:	WASH BAY Project Owner:	Phone #:	
Project Name:		Fax #:	
Project Location:	HOBBS		

ANALYSIS REQUEST

TCLP Chlorides

Received HAR 1998 Hobbs OCD

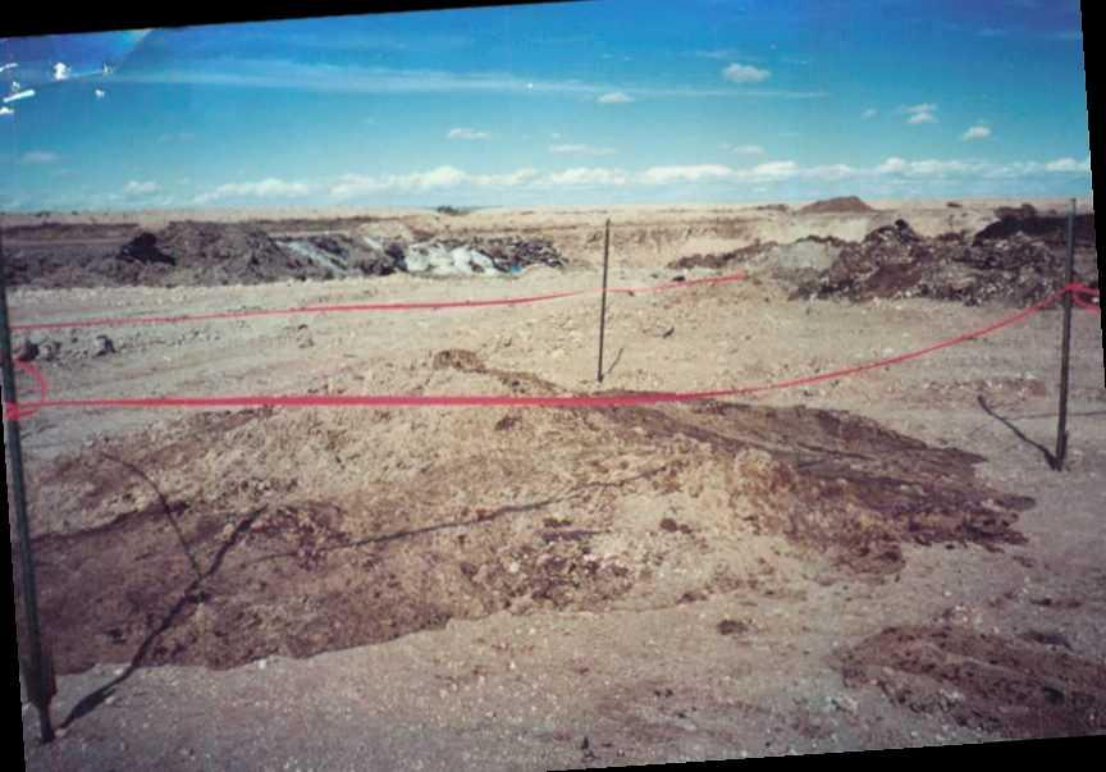
FOR LAB USE ONLY LAB I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX: GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	PRES.: ACID:	ICE / COOL	OTHER:	SAMPLING: DATE	TIME
H 31444-1	WASH BAY	G	4		✓						✓		02/05/98	11:30

PLEASE NOTE: Liability 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 the client for the 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 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.

Terms and Conditions: Interest will be charged on all accounts more than 30 days past due at the rate of 24% per annum from the original date of invoice, and all costs of collections, including attorney's fees.

Sampler Relinquished:	Date:	Received By:	Phone Result ☐ Yes ☐ No Additional Fax #:
	Time:		Fax Result: ☐ Yes ☐ No
Relinquished By: Bill Russell	Date:	Received By: (Lab Staff)	REMARKS: COPY TO CRI
	Time:		
Delivered By: (Circle One) Sampler - UPS - Bus - Other:		Sample Condition Cool ☐ Yes ☐ No Intact ☐ Yes ☐ No	CHECKED BY: (Initials)

† Cardinal cannot accept verbal changes. Please fax written changes to 915-673-7020.



CRI - EAST SIDE
LANDFILL

IR 831317

BY: WAYNE PRICE

FEB 26, 1998 2:50 PM

LOOKING NE

DOWELL SCHLUMBER WASTE GEL PILE ISOLATED
METAL SHAVINGS & TESTERS!

BACKGROUND IS CRI ACTIVE LANDFILL!

Wayne Price

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Verbal Approval Received: Yes ☐ No ☐	4. Generator Dowell Schlumberger 5. Originating Site Hobbs yard
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter JLNM Construction
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 1105 W Bender Hobbs	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.
B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL: HOLDING FOR ANALYTICAL — OK rec 3/10/98 JS

The following MSDS sheets are from the Dowell Schlumber Hobbs yard. The material was gernerated by gelling frac tanks to be pumped down a well on the Texaco WDDU # 146 Location. I have also included a certificate of waste.

ON FEB 25, 1998 CRI (MR. MARSH) CALLED ASK FOR VERBAL APPROVAL TO TAKE THIS WASTE, HE SAID IT WAS NON-HAZARDS, & WOULD ISOLATE UNTIL C-136 IS APPROVED. CRI SUBMITTED C-136 ON 2/26/98 WITH MSDS. PRICE-MMOCD NOTED IT MIGHT BE D001 HAZ WASTE. INFORMED CRI (MARSH) TO 02-019 SAMPLE & TEST & ISOLATE. 2/26/98 @ 11:30 AM WENT TO CRI ~~TOOK~~ MET DAVID & HIM ISOLATE TOOK PICTURES. MARSH - PRICE AGREED ON TEST REQUIREMENTS of IGN & BENZENE. JS

FEB 1998 Received Hobbs OCD

Estimated Volume 2000 lbs cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Environmental Compliance Manager DATE: 02/26/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: Wayne Price TITLE: ENVR ENGR DATE: 3/10/98

APPROVED BY: Martyn J. Kilpatrick TITLE: Env. Geologist DATE: 3/16/98

CARDINAL LABORATORIES

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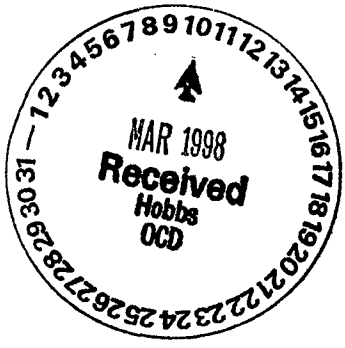
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
DOWELL SCHLUMBERGER
ATTN: DARWIN THOMPSON
P.O. BOX 640
HOBBS, NM 88240
FAX TO: 505-393-7629

Receiving Date: 02/27/98
Reporting Date: 02/28/98
Project Owner: DOWELL
Project Name: GEL TEXACO
Project Location: CRI-HALFWAY

Sampling Date: 02/27/98
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC/GP

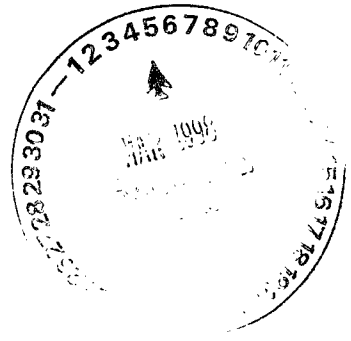
LAB NUMBER	SAMPLE ID	Benzene (mg/Kg)	Ignitability
ANALYSIS DATE:		2/27/98	2/27/98
H3488-1	GEL-SOIL	<0.020	Nonflammable
Quality Control		0.094	NR
True Value QC		0.100	NR
% Accuracy		94	NR
Relative Percent Difference		1.7	NR
METHODS: SW-846		8260	1030



Chemist

2/28/98
Date

H3488.XLS


1 2 3 4 5 6 7 8 9 10
22 23 30 31 — 1

To: Whom it May Concern

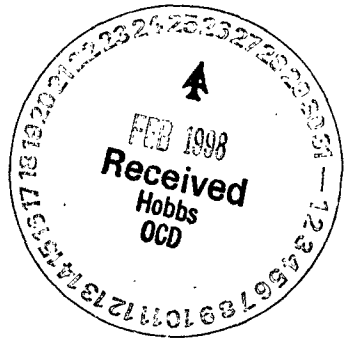
From: Darwin Thompson
Dowell Schlumberger
PO Box 640
Hobbs, NM

Re: disposal of slurry gel mixture J877

This waste mixture is composed of diesel and guar gum gel powder. It does not contain any hazardous waste. It was generated during the process of gelling frac tanks on location before a job to be pumped down the well. The MSDS has been forwarded to CRI. The waste will be transported to CRI by JLNM Construction Co.

Sincerely,
Darwin Thompson
Maintenance Supervisor

Darwin Thompson



CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR Dowell Schlumberger

ADDRESS 1105 w. Bender

GENERATING SITE Hobbs NM yard

COUNTY Lea STATE NM

TYPE OF WASTE slurry gel J 877

ESTIMATED VOLUME 2000 lb.

GENERATING PROCESS blending frac tanks on location

REMARKS From Texaco WDDU # 146 location

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY JLNM CONSTRUCTION CO.

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 261.3.

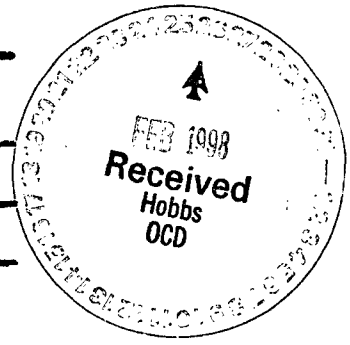
AGENT Darwin Thompson
SIGNATURE

NAME Darwin Thompson
PRINTED

ADDRESS PO Box 640

Hobbs, NM 88240

DATE 2/25/98



TOTAL P.02

Schlumberger
Dowell

MATERIAL SAFETY DATA SHEET

(Complies with USA OSHA 29 CFR 1910.1200 and ANSI Z 400.1)

DOWELL PRODUCT CODE: **J877** Effective Date: 1/3/96

1. IDENTIFICATION OF THE SUBSTANCE/PREPARATION AND OF THE COMPANY/UNDERTAKING

Identification of the substance or preparation:

PSG POLYMER SLURRY J877

Company/undertaking identification: Dowell Safety/Environment - Worldwide
100 Gillingham Lane
Sugar Land, Texas 77478, USA
Error! Cannot open file.

Corporate Emergency Phone: USA 1-713-595-2345

Corporate Non-Emergency Phone: USA 1-713-275-8081

2. COMPOSITION/INFORMATION ON INGREDIENTS

PROPRIETARY MIXTURE CONTAINING:
DIESEL OIL #2; 68476-34-6; 30-60%
AROMATIC POLYMER DERIVATIVE; 30-60%

3. HAZARDS IDENTIFICATION

Emergency Overview

Form: Liquid
Color: Amber
Odor: Diesel

Main environmental hazards:
None known.

Main Physical Hazards

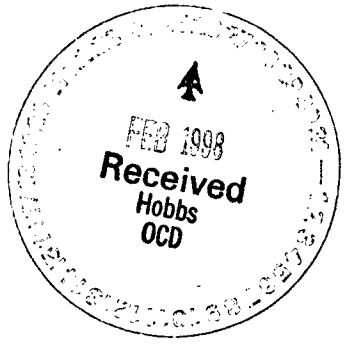
Special Precautions: None.
Physical Hazard: flammable liquid

Main Health Hazards:

HMIS RATING: Health 2 Flammability 2 Reactivity 0

May cause skin irritation. May cause respiratory tract irritation. May cause irritation of mouth, throat and stomach. May cause eye irritation.

See Section 11 for a complete discussion of health hazards.



4. FIRST AID MEASURES

Eye contact: Immediately flush eyes with water for 15 minutes while holding eyelids open. Seek medical attention.

Skin contact: Remove contaminated clothes and shoes. Wash thoroughly with soap and water. Seek medical attention if irritation occurs.

Inhalation: Remove to fresh air. Seek medical attention if irritation persists or you feel unwell.

Swallowing: DO NOT induce vomiting. Give activated charcoal in water, or give 2 glasses milk or water. Seek medical attention at once.

Notes: None.

DOWELL PRODUCT CODE: **J877** Effective Date: 1/3/96

5. FIRE FIGHTING MEASURES

Extinguishing media: Water Fog, Alcohol Foam, CO2, Dry Chemical

Further Information: Wear protective fire fighting clothing and avoid breathing vapors. Use self-contained breathing apparatus in closed areas. Vapors may travel along the ground and ignite when an ignition source is contacted. Avoid breathing vapors. Use SCBA in closed areas.

Flash point: 140 F

Method: Tag closed cup

Flammability (explosion limits in air):

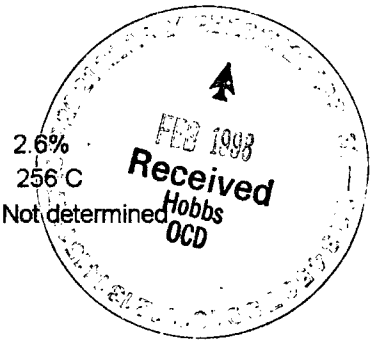
Lower: 0.4% Upper: 2.6%

Autoflammability (auto-ignition temperature): 256 C

Explosive properties (thermal decomposition temperature): Not determined

NFPA Rating: Health 2 Flammability 2 Reactivity 0 Other: None

Combustion products: see Section 10.



6. ACCIDENTAL RELEASE MEASURES

After spillage/leakage: Contain with dikes. Use explosion proof equipment to recover. Remove all sources of ignition. Soak up residual on inert absorbant (sand). Put in steel or plastic drum approved for flammables.

See Section 8 for protective equipment information.

See Section 13 for disposal information.

7. HANDLING AND STORAGE

Special Precautions: Keep away from heat, sparks, and flame. Store out of direct sunlight in well ventilated area. Keep container closed when not in use. Use with adequate ventilation. Do not cut or weld on container.

Packaging requirements: Uncoated phosphatized steel drum (DOT 17E); high density polyethylene (HDPE) can for short term storage only.

Ventilation: Provide ventilation to keep airborne concentrations below exposure limits.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Respiratory protection: None normally needed. Use NIOSH approved respirator with organic vapor/acid gas protection (color coded yellow) if vapors are generated and for emergencies.

Eye protection: Chemical splash goggles.

Hand protection: Impervious gloves made of: Rubber.

Skin protection: Clean, body-covering clothing. For spills and emergencies, also wear boots and impervious suit.

Exposure Limit Guidelines (mg/m3)

No components have established exposure limits.

DOWELL PRODUCT CODE: **J877** Effective Date: 1/3/96

9. PHYSICAL AND CHEMICAL PROPERTIES

Form:	Liquid
Color:	Amber
Odor:	Diesel
pH value:	Not applicable
Boiling point:	Not determined
Pour point:	Not determined
Vapor pressure:	<0.13 kPa (68 F)
Relative density (specific gravity):	1.06 (68 F)
Bulk Density (solids):	Not applicable
%Solubility in water:	Not determined
Viscosity:	Not determined
Relative Vapor Density (air=1):	>1
% Volatile:	<50

10. STABILITY AND REACTIVITY

Stability:	Stable.
Conditions to avoid:	None.
Materials to avoid:	Oxidizers
Hazardous Polymerization:	Will not occur.
Dust explosion hazard (solids):	Not applicable.
Special hazards:	None.
Hazardous decomposition products:	When heated strongly or burned, oxides of carbon and harmful organic chemical fumes are released.

11. TOXICOLOGICAL INFORMATION

Eye contact:	Irritant. May cause pain, redness, discomfort.
Skin contact:	Irritant; may cause pain, redness, dermatitis.
Inhalation:	Irritant; may cause pain and coughing.
Ingestion:	Irritant; may cause pain or discomfort to mouth, throat and stomach.
Carcinogenicity:	Not listed by IARC, USA NTP, or USA OSHA.
Mutagenicity:	Not known to cause heritable genetic damage.
Teratogenicity:	Not known to cause birth defects.
Target organs which may be affected:	None known.
Sensitization:	Not known to cause allergic reaction.
Other:	Can cause headache, narcosis.

12. ECOLOGICAL INFORMATION

Information on product as a whole:

Main environmental hazards:	None known.
Degradability:	Partially biodegradable.
Fish Toxicity:	Not determined
Acute invertebrates toxicity:	Not determined
Growth Inhibition (algae):	Not determined
Other:	None known.

Information on components:

DOWELL PRODUCT CODE: **J877** Effective Date: 1/3/96

CHEMICAL NAME: AROMATIC POLYMER DERIVATIVE

Invertebrate Tox: LC50=96hr >1000 mg/l Species: Chaetogammarus marinus

Growth Inhibition Algae: EC50=72hr >1000 mg/l Species: Phaeodactylum tricornutum

Partition Coefficient:

13. DISPOSAL CONSIDERATIONS

Product: Ship via permitted waste hauler to permitted hazardous waste disposal facility for incineration (preferred) or disposal well injection of all liquids and landfilling of solids.

Container: Sell drum to an approved drum reconditioner or triple rinse, crush, and ship to sanitary landfill unless prohibited by local regulations.

USA EPA RCRA: D001 ?

14. TRANSPORT INFORMATION

ICC Tariff Classification: Compound, Gas or Oil Well Drilling

ICC Item Number: 138640 ICC Class: 50 LTL 35 TL

Department of Transportation (DOT)

Description: Hazardous Material

Hazard Class: 3

Shipping Name: Diesel fuel mixture, 3, NA 1993, PG III

DOT Label: none

Comment: Not land regulated in packages of 110 gallons or less.

CERCLA RQ: Not established.

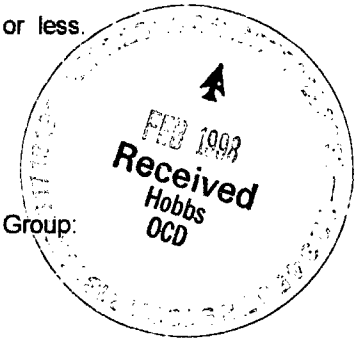
Canadian Shipments

Shipping Name:

Special Provision:

Classification: Package Group:

ICAO Class:



15. REGULATORY INFORMATION

Notification/restrictions status:

USA:

All components of this material are on the USA TSCA inventory, or the components are exempt from inventory reporting.

CANADA:

All components of this material are on the Canada DSL, or the components are exempt from inventory reporting.

This product contains no chemicals subject to the USEPA reporting requirements of SARA 313.

The USEPA CERCLA Reportable Quantity (RQ) for this product as a whole is: Not established.

DOWELL PRODUCT CODE:	**J877**	Effective Date:	1/3/96

16. OTHER INFORMATION

Sections affected by last revision:

None

*Mark of Schlumberger. The information herein is believed to be accurate and is presented in good faith; however, no warranties or representations are made by Dowell regarding the accuracy or completeness of the information.

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Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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Oil Conservation Division

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District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Penroc Oil Company
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site NEMU Unit # 1
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Unknown
3. Address of Facility Operator P.O. Box 369 Hobbs,	8. State New Mexico
7. Location of Material (Street Address or ULSTR)	NW/4 Section 5 Township 17 South Range 33 East

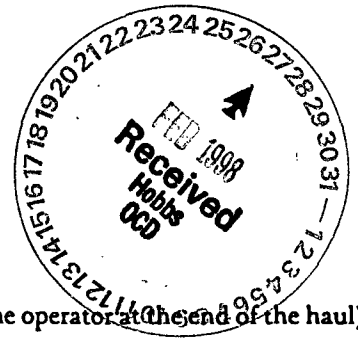
9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.
B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Penroc Oil Corporation NEMU Unit # 1. The material was generated by a pit closure. (NW/4 Section 5 Township 17 South Range 33 East) I have included a certificate of waste and a chain of custody.



02-020

Estimated Volume 150 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo
Waste Management Facility Authorized Agent
TITLE: Environmental Compliance Manager DATE: 02/26/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR DATE: 2/27/98

APPROVED BY: _____ TITLE: Env. Geologist DATE: 3/3/98

Please Deliver This Fax To:

Ken Marsh

505 [redacted] 393-3615

From:

Marlene Kieling

Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505
(505) 827-7131 Office
(505) 827-8177 Fax

Date: 2-3-98

Pages: 1 of 2

Subject: [redacted] Penroc Verbal approval to accept waste

(If you have trouble receiving this fax, please call the phone number above.)

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1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

NEW MEXICO
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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District

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Verbal Approval Received: Yes ☒ No ☐	4. Generator Penroc Oil Company
	5. Originating Site NEMU Unit # 1
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Unknown
3. Address of Facility Operator P.O. Box 369 Hobbs,	8. State New Mexico
7. Location of Material (Street Address or ULSTR)	NW/4 Section 5 Township 17 South Range 33 Eas

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Penroc Oil Corporation NEMU Unit # 1. The material was generated by a pit closure. (NW/4 Section 5 Township 17 South Range 33 East) I have included a certificate of waste and a chain of custody.

02-020

Estimated Volume 150 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo Waste Management Facility Authorized Agent TITLE: Environmental Compliance Manager DATE: 02/26/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: _____

APPROVED BY: Martyn J. Kirby TITLE: Env Geologist DATE: 3-2-98

CERTIFICATE OF WASTE STATUS
NON-EMEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY / GENERATOR Penroc Oil Corporation

ADDRESS P.O. Box 5970 Hobbs, New Mexico 88241

GENERATING SITE NW/4 Section 5 Township 17 South Range 33 East

COUNTY Lea STATE New Mexico

TYPE OF WASTE Contaminated soil from pit closure

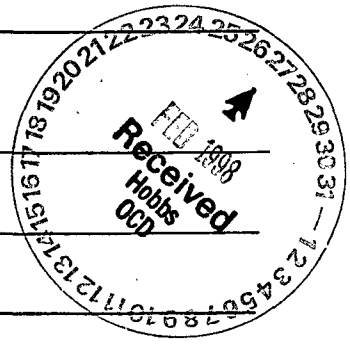
ESTIMATED VOLUME 150 Yards

GENERATING PROCESS Pit closure

REMARKS

NMOCD FACILITY Controlled Recovery, Inc.

TRUCKING COMPANY Unknown



As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Sections 2613.

AGENT _____
SIGNATURE

NAME M. Y. Merchant
PRINTED

ADDRESS P.O. Box 5970 Hobbs, New Mexico 88241

DATE 02/26/98

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
CONTROLLED RECOVERY, INC.
ATTN: KEN MARSH
P.O. BOX 369
HOBBS, NM 88241
FAX TO: 505-393-3615

Receiving Date: 10/31/97
Reporting Date: 11/07/97
Project Number: NOT GIVEN
Project Name: PENROC OIL CORP.
Project Location: NEMU#1 UNIT #1

Sampling Date: 10/31/97
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: GP

TCLP METALS

LAB NUMBER SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:	11/07/97	11/06/97	11/07/97	11/06/97	11/06/97	11/06/97	11/04/97	11/07/97
EPA LIMITS:	5	5	100	1	5	5	0.2	1
H3298-1 PIT COMPOSITE	<1	<1	<10	<0.1	<1	<1	<0.02	<0.1
Quality Control	0.199	4.96	9.90	1.989	2.51	3.98	0.0099	0.050
True Value QC	0.200	5.00	10.00	2.000	2.50	4.00	0.0100	0.050
% Recovery	100	99	99	99	100	100	99	100
Relative Standard Deviation	1.9	0.3	9.3	0.2	0.3	0.7	13.2	4.0

METHODS: EPA 1311, 600/4-91/0	206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2

FEB 1998 Received Hobbs OCD

Gayle A. Potter, Chemist

11/07/97
Date

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ANALYTICAL RESULTS FOR
CONTROLLED RECOVERY, INC.
ATTN: KEN MARSH
P.O. BOX 369
HOBBS, NM 88241
FAX TO: 505-393-3615

Receiving Date: 10/31/97
Reporting Date: 11/04/97
Project Number: NOT GIVEN
Project Name: PENROC OIL CORP.
Project Location: NEMU#1 UNIT #1
Lab Number: H3298-1
Sample ID: PIT COMPOSITE

Analysis Date: 11/04/97
Sampling Date: 10/31/97
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC

TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Sample Result H3298-1	Method Blank	QC	% Recov.	True Value QC
Pyridine	5.00	<0.020	<0.005	0.043	43	0.100
1,4-Dichlorobenzene	7.50	<0.020	<0.005	0.065	65	0.100
o-Cresol	200	<0.020	<0.005	0.080	80	0.100
m, p-Cresol	200	<0.020	<0.005	0.142	71	0.200
Hexachloroethane	3.00	<0.020	<0.005	0.067	67	0.100
Nitrobenzene	2.00	<0.020	<0.005	0.091	91	0.100
Hexachloro-1,3-butadiene	0.500	<0.020	<0.005	0.078	78	0.100
2,4,6-Trichlorophenol	2.00	<0.020	<0.005	0.102	102	0.100
2,4,5-Trichlorophenol	400	<0.020	<0.005	0.096	96	0.100
2,4-Dinitrotoluene	0.130	<0.020	<0.005	0.096	96	0.100
Hexachlorobenzene	0.130	<0.020	<0.005	0.108	108	0.100
Pentachlorophenol	100	<0.020	<0.005	0.104	104	0.100

	% RECOVERY
Fluorophenol	52
Phenol-d5	47
Nitrobenzene-d5	94
2-Fluorobiphenyl	98
2,4,6-Tribromophenol	98
Terphenyl-d14	113

METHODS: EPA SW 846-8270, 1311

Burgess J. A. Cooke, Ph. D.

11/4/97
Date

PLEASE NOTE: **Liability 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, 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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ANALYTICAL RESULTS FOR
CONTROLLED RECOVERY, INC.
ATTN: KEN MARSH
P.O. BOX 369
HOBBS, NM 88241
FAX TO: 505-393-3615

Receiving Date: 10/31/97
Reporting Date: 11/03/97
Project Number: NOT GIVEN
Project Name: PENROC OIL CORP.
Project Location: NEMU#1 UNIT #1
Lab Number: H3298-1
Sample ID: PIT COMPOSITE

Analysis Date: 11/03/97
Sampling Date: 10/31/97
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC

TCLP VOLATILES (ppm)	EPA LIMIT	Sample Result H3298-1	Method Blank	QC	%Recov.	True Value QC
Vinyl Chloride	0.20	<0.005	<0.005	0.083	83	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.099	99	0.100
Methyl Ethyl Ketone	200	<0.050	<0.050	0.082	82	0.100
Chloroform	6.0	<0.005	<0.005	0.097	97	0.100
1,2-Dichloroethane	0.5	<0.005	<0.005	0.107	107	0.100
Benzene	0.5	0.048	<0.005	0.104	104	0.100
Carbon Tetrachloride	0.5	<0.005	<0.005	0.107	107	0.100
Trichloroethylene	0.5	<0.005	<0.005	0.108	108	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.103	103	0.100
Chlorobenzene	100	<0.005	<0.005	0.111	111	0.100
1,4-Dichlorobenzene	7.5	<0.005	<0.005	0.111	111	0.100

	% RECOVERY
Dibromofluoromethane	89
Toluene-d8	88
Bromofluorobenzene	87

METHODS: EPA SW 846-8260, 1311

Burgess J.A. Cooke, Ph. D.

11/3/97
Date

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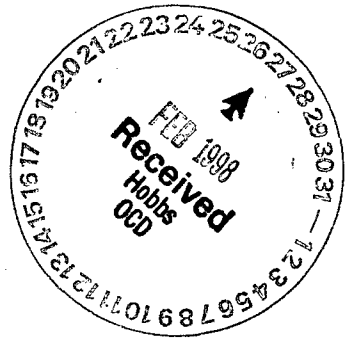
ANALYTICAL RESULTS FOR
CONTROLLED RECOVERY, INC.
ATTN: KEN MARSH
P.O. BOX 369
HOBBS, NM 88241
FAX TO: 505-393-3615

Receiving Date: 10/31/97
Reporting Date: 11/03/97
Project Number: NOT GIVEN
Project Name: PENROC OIL CORP.
Project Location: NEMU#1 UNIT #1

Sampling Date: 10/31/97
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: AH/BC

LAB NUMBER	SAMPLE ID	REACTIVITY Sulfide (ppm)	REACTIVITY Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY (°F)
ANALYSIS DATE:		11/03/97	11/03/97	11/03/97	11/03/97
H3298-1	PIT COMPOSITE	<50	<50	7.02	Nonflammable
Quality Control		NR	NR	7.00	NR
True Value QC		NR	NR	7.00	NR
% Accuracy		NR	NR	100	NR
Relative Percent Difference		NR	NR	0	NR

METHOD: EPA SW 846-7.3, 7.2, 1010, 1311, *40 CFR 261*



Chemist

11/3/97
Date

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H3298RXLS

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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

H3298

Page ___ of ___

Company Name: CRI	BILL TO: PO #:
Project Manager: Ken Marsh	Company: CRI
Address: P.O. Box 369	Attn: Ken Marsh
City: Hobbs State: NM Zip: 88241	Address: P.O. Box 369
Phone #:	City: Hobbs,
Fax #:	State: NM Zip: 88241
Project #:	Phone #:
Project Name: PENROC OIL CORP	Fax #:
Project Location: NEMU #1 UNIT #1	

ANALYSIS REQUEST

LAB I.D. #	Sample I.D. (S-17S-33E LEASE E 881)	COMP(C) OR GRAB(G)	# CONTAINERS	MATRIX: GROUNDWATER	WASTEWATER	SOIL – Bz/T	OIL	SLUDGE	OTHER:	PRESERVATIVE: ACID:	ICE / COOL	OTHER:	SAMPLING: DATE	TIME	TCLP - Complete Metals, Sw846 - 8260, 8270 RCI
H3298-1	PIT COMPOSITE	C	1			✓							10/31/97	2:40P	

Received Hobbs OCD

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Sampler Relinquished:	Date: 10/31/97 Time: 2:40P	Received By:	Phone Result ☐ Yes ☐ No Additional Fax #: Fax Results: ☐ Yes ☐ No REMARKS:
Relinquished By:	Date: Time:	Received By: (Lab Staff)	
Delivered By: (Circle One) UPS - Fed Ex - Bus - Other:		Sample Condition: Cool ☒ Yes ☐ No Intact ☒ Yes ☐ No	CHECKED BY: (Initials)

District I - (505) 393-6161
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Hobbs, NM 88241-1980
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811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
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New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
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REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ OK LWP 3/16/98 Verbal Approval Received: Yes ☒ No ☐	4. Generator BJ Sevices 5. Originating Site Artesia
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 2401 Sivley Artesia	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the BJ Services Artesia yard. The material was generated by washing dirt and mud off of Service Equipment. I have included a certificate of waste and a chain of custody.

MAR 1998 Received Hobbs OCD

MAR 1998 RECEIVED OCD - ARTESIA

02-021

Soaph & Mud

Estimated Volume 120 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

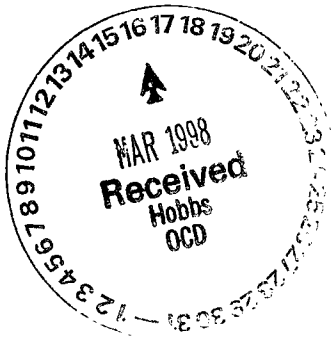
SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Environmental Compliance Manager DATE: 02/23/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env Engr 3/18 DATE: 3/16/98

APPROVED BY: Martyn J. Kirby TITLE: Env Geologist DATE: 3/27/98


MAR 1998
Received
Hobbs
OCD

To: Billie Charo

From: Mike Wiggins

Date: February 9, 1998

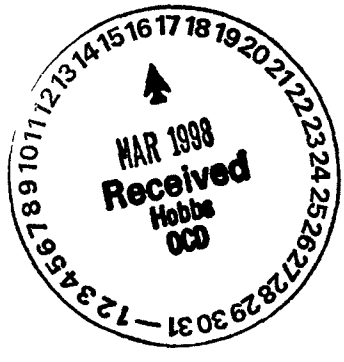
Re: Wash Rack Sludge

This memo is to request CRI to pick up and properly dispose of our wash rack sludge. This waste is generated from washing dirt and mud off of our equipment.

Please find the enclosed Certificate of Waste Status and the analytical report.

Should you have any questions or require more information, please call me at (505) 746-3140

cc: EPA file



BJ Services Company, U.S.A. • 2401 Sivley, Artesia, NM 88210
Office: (505) 746-3140 • Fax: (505) 746-2293

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR BJ Services Company

ADDRESS 2401 Sibley Artesia NM 88210

GENERATING SITE Wash Bay Sump

COUNTY Eddy STATE NM

TYPE OF WASTE Wash Rack Sludge

ESTIMATED VOLUME 120 BBl

GENERATING PROCESS Washing Dirt and Mud off Of Service Equipment.

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

MAR 1998 Received Hobbs OCD

AGENT Mike Wiggins
SIGNATURE

NAME Mike Wiggins
PRINTED

ADDRESS 2401 Sibley
Artesia NM 88210

DATE February 9, 1998

Certificate of Analysis

Quanterra Incorporated
5307 Industrial Oaks Boulevard, Suite 160
Austin, Texas 78735

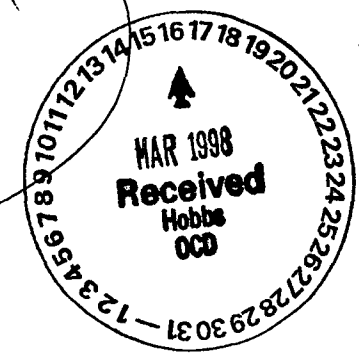
512 892-6684 Direct
512 892-6652 Fax

Quanterra
Environmental Services

ANALYTICAL REPORT

ARTESIA,NM

Lot #: I8A160124



DAVID BURKETT

B.J. Services Company

QUANTERRA INCORPORATED

Sandra L. Green
Project Manager

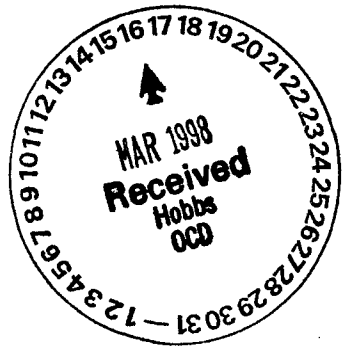
February 6, 1998

Quanterra
Environmental Services

EXECUTIVE SUMMARY - Detection Highlights

I8A160124

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
WASH RACK SLUDGE 01/14/98 08:30 001				
Flashpoint	>150	>150	deg F	SW846 1010
Total Recoverable Petroleum Hydrocarbons	19000	760	mg/kg	MCAWW 418.1
Corrosivity	7.3	1.0	No Units	SW846 9045A
Percent Moisture	34.1	0.50	%	OCLP OLM03.1



Quanterra
Environmental Services

ANALYTICAL METHODS SUMMARY

I8A160124

PARAMETER	ANALYTICAL METHOD
% Moisture, Decanted-CLP	OCLP OLM03.1
Corrosivity	SW846 9045A
Mercury in Liquid Waste (Manual Cold-Vapor)	SW846 7470A
Pensky-Martens Method for Determining Ignitability	SW846 1010
Reactive Cyanide	SW846 7.3.3
Reactive Sulfide	SW846 7.3.4
Total Recoverable Petroleum Hydrocarbons	MCAWW 418.1
TCLP BNA's	SW846 8270B
TCLP Metals (ICP)	SW846 6010A
TCLP Volatiles	SW846 8240B

References:

MCAWW "Methods for Chemical Analysis of Water and Wastes", EPA-600/4-79-020, March 1983 and subsequent revisions.

OCLP USEPA Contract Laboratory Program Statement of Work for Organics Analysis, Multi-Media, Multi-Concentration.

SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 and its updates.

Quanterra
Environmental Services

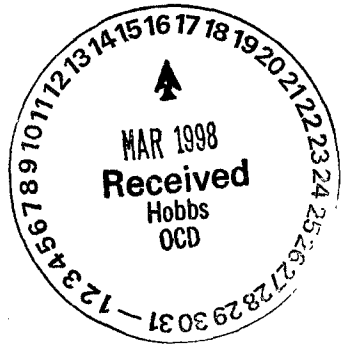
SAMPLE SUMMARY

I8A160124

WO #	SAMPLE#	CLIENT SAMPLE ID	DATE	TIME
CEX9V	001	WASH RACK SLUDGE	01/14/98	08:30

NOTE(S):

- The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit.
- This report must not be reproduced, except in full, without the written approval of the laboratory.
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.



Quanterra
Environmental Services

B.J. SERVICES COMPANY

Client Sample ID: WASH RACK SLUDGE

TCLP GC/MS Semivolatiles

Lot-Sample #...: I8A160124-001 **Work Order #...:** CEX9V107 **Matrix.....:** SOLID
Date Sampled...: 01/14/98 08:30 **Date Received..:** 01/16/98
Leach Date.....: 01/21/98 **Prep Date.....:** 01/26/98 **Analysis Date..:** 01/28/98
Leach Batch #..: P802109 **Prep Batch #...:** 8026185 **Analysis Time..:** 09:52
Dilution Factor: 1
% Moisture.....: 34

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
o-Cresol	ND	0.050	mg/L	SW846 8270B
m-Cresol & p-Cresol	ND	0.10	mg/L	SW846 8270B
1,4-Dichlorobenzene	ND	0.050	mg/L	SW846 8270B
2,4-Dinitrotoluene	ND	0.050	mg/L	SW846 8270B
Hexachlorobenzene	ND	0.050	mg/L	SW846 8270B
Hexachlorobutadiene	ND	0.050	mg/L	SW846 8270B
Hexachloroethane	ND	0.050	mg/L	SW846 8270B
Nitrobenzene	ND	0.050	mg/L	SW846 8270B
Pentachlorophenol	ND	0.25	mg/L	SW846 8270B
Pyridine	ND	0.10	mg/L	SW846 8270B
2,4,5-Trichlorophenol	ND	0.050	mg/L	SW846 8270B
2,4,6-Trichlorophenol	ND	0.050	mg/L	SW846 8270B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2-Fluorophenol	38	(21 - 100)
Phenol-d5	32	(10 - 94)
Nitrobenzene-d5	69	(35 - 114)
2-Fluorobiphenyl	64	(43 - 116)
2,4,6-Tribromophenol	111	(10 - 123)
Terphenyl-d14	114	(33 - 141)

NOTE(S):

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching Procedure Method 1311 (55 FR 26986)

Quanterra
Environmental Services

B.J. SERVICES COMPANY

Client Sample ID: WASH RACK SLUDGE

TCLP GC/MS Volatiles

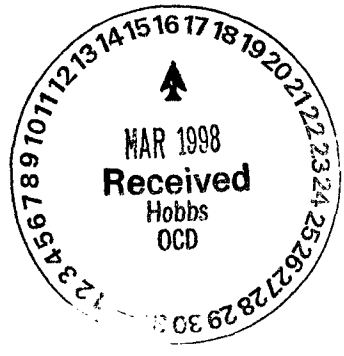
Lot-Sample #...: I8A160124-001 **Work Order #...:** CEX9V108 **Matrix.....:** SOLID
Date Sampled...: 01/14/98 08:30 **Date Received..:** 01/16/98
Leach Date.....: 01/21/98 **Prep Date.....:** 02/05/98 **Analysis Date..:** 02/05/98
Leach Batch #..: P802108 **Prep Batch #...:** 8036228 **Analysis Time..:** 23:05
Dilution Factor: 1
% Moisture.....: 34

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
Benzene	ND	0.050	mg/L	SW846 8240B
Carbon tetrachloride	ND	0.050	mg/L	SW846 8240B
Chlorobenzene	ND	0.050	mg/L	SW846 8240B
Chloroform	ND	0.050	mg/L	SW846 8240B
1,2-Dichloroethane	ND	0.050	mg/L	SW846 8240B
1,1-Dichloroethylene	ND	0.050	mg/L	SW846 8240B
Methyl ethyl ketone	ND	0.20	mg/L	SW846 8240B
Tetrachloroethylene	ND	0.050	mg/L	SW846 8240B
Trichloroethylene	ND	0.050	mg/L	SW846 8240B
Vinyl chloride	ND	0.10	mg/L	SW846 8240B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
4-Bromofluorobenzene	100	(86 - 115)
1,2-Dichloroethane-d4	93	(76 - 114)
Toluene-d8	93	(88 - 110)

NOTE(S):

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching Procedure Method 1311 (55 FR 26986)



Quanterra
Environmental Services

B.J. SERVICES COMPANY

Client Sample ID: WASH RACK SLUDGE

General Chemistry

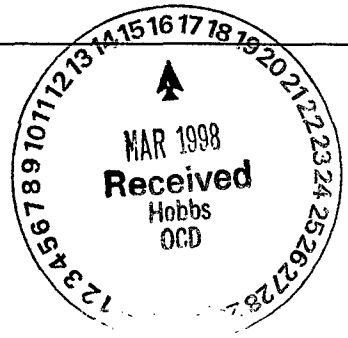
Lot-Sample #...: I8A160124-001 **Work Order #...:** CEX9V **Matrix.....:** SOLID
Date Sampled...: 01/14/98 08:30 **Date Received..:** 01/16/98
% Moisture.....: 34

PARAMETER	RESULT	RL	UNITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Corrosivity	**7.3**	**1.0**	**No Units**	**SW846 9045A**	**01/19/98**	**8020112**
	Dilution Factor: 1					
	Analysis Time..: 13:00					
Flashpoint	**>150**	**>150**	**deg F**	**SW846 1010**	**01/23/98**	**8026151**
	Dilution Factor: 1					
	Analysis Time..: 00:00					
Percent Moisture	**34.1**	**0.50**	**%**	**OCLP OLM03.1**	**01/20-01/21/98**	**8020237**
	Dilution Factor: 1					
	Analysis Time..: 13:00					
Reactive Cyanide	ND	300	mg/kg	SW846 7.3.3	01/21-01/22/98	8022182
	Dilution Factor: 1					
	Analysis Time..: 11:16					
Reactive Sulfide	ND	300	mg/kg	SW846 7.3.4	01/21-01/22/98	8022189
	Dilution Factor: 1					
	Analysis Time..: 00:00					
Total Recoverable Petroleum Hydrocarbons	**19000**	**760**	**mg/kg**	**MCAWW 418.1**	**01/26-01/27/98**	**8026164**
	Dilution Factor: 50					
	Analysis Time..: 15:00					

NOTE(S):

RL Reporting Limit

Results and reporting limits have been adjusted for dry weight.



Quanterra
Environmental Services

B.J. SERVICES COMPANY

Client Sample ID: WASH RACK SLUDGE

TCLP Metals

Lot-Sample #...: I8A160124-001 **Matrix.....:** SOLID
Date Sampled...: 01/14/98 08:30 **Date Received..:** 01/16/98
Leach Date.....: 01/21/98 **Leach Batch #..:** P802109

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
Prep Batch #...: 8023178						
Silver	ND	1.0	mg/L	SW846 6010A	01/23-01/26/98	CEX9V109
		Dilution Factor: 2				
		Analysis Time..: 12:33				
Arsenic	ND	1.0	mg/L	SW846 6010A	01/23-01/26/98	CEX9V10A
		Dilution Factor: 2				
		Analysis Time..: 12:33				
Barium	ND	20.0	mg/L	SW846 6010A	01/23-01/26/98	CEX9V10C
		Dilution Factor: 2				
		Analysis Time..: 12:33				
Cadmium	ND	0.20	mg/L	SW846 6010A	01/23-01/26/98	CEX9V10D
		Dilution Factor: 2				
		Analysis Time..: 12:33				
Chromium	ND	1.0	mg/L	SW846 6010A	01/23-01/26/98	CEX9V10E
		Dilution Factor: 2				
		Analysis Time..: 12:33				
Lead	ND	1.0	mg/L	SW846 6010A	01/23-01/26/98	CEX9V10F
		Dilution Factor: 2				
		Analysis Time..: 12:33				
Selenium	ND	0.50	mg/L	SW846 6010A	01/23-01/26/98	CEX9V10G
		Dilution Factor: 2				
		Analysis Time..: 12:33				
Prep Batch #...: 8026167						
Mercury	ND	0.0020	mg/L	SW846 7470A	01/26/98	CEX9V10H
		Dilution Factor: 1				
		Analysis Time..: 15:53				

MAR 1998
Received
Houston

NOTE(S):

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching Procedure Method 1311 (55 FR 26986).

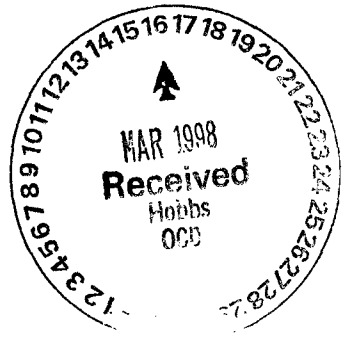
Quanterra
Environmental Services

QC DATA ASSOCIATION SUMMARY

I8A160124

Sample Preparation and Analysis Control Numbers

SAMPLE#	MATRIX	ANALYTICAL METHOD	LEACH BATCH #	PREP BATCH #	MS RUN#
001	SOLID	SW846 1010		8026151	8026034
	SOLID	MCAWW 418.1		8026164	8026045
	SOLID	SW846 6010A	P802109	8023178	8023051
	SOLID	SW846 9045A		8020112	8020009
	SOLID	OCLP OLM03.1		8020237	8021086
	SOLID	SW846 7.3.3		8022182	8022046
	SOLID	SW846 7.3.4		8022189	8022048
	SOLID	SW846 8270B	P802109	8026185	8026060
	SOLID	SW846 8240B	P802108	8036228	8037030
	SOLID	SW846 7470A	P802109	8026167	8026051



Quanterra
Environmental Services

METHOD BLANK REPORT

TCLP GC/MS Semivolatiles

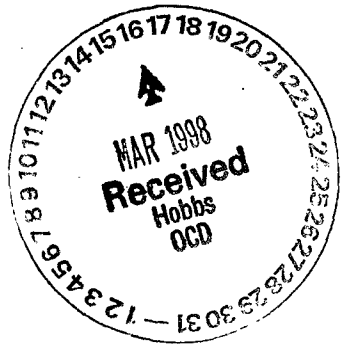
Client Lot #...: I8A160124 **Work Order #...:** CF1H8109 **Matrix.....:** SOLID
MB Lot-Sample #: I8A210000-228
Leach Date.....: 01/21/98 **Prep Date.....:** 01/26/98 **Analysis Date..:** 01/27/98
Leach Batch #..: P802109 **Prep Batch #...:** 8026185 **Analysis Time..:** 20:56
Dilution Factor: 1

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
o-Cresol	ND	0.050	mg/L	SW846 8270B
m-Cresol & p-Cresol	ND	0.10	mg/L	SW846 8270B
1,4-Dichlorobenzene	ND	0.050	mg/L	SW846 8270B
2,4-Dinitrotoluene	ND	0.050	mg/L	SW846 8270B
Hexachlorobenzene	ND	0.050	mg/L	SW846 8270B
Hexachlorobutadiene	ND	0.050	mg/L	SW846 8270B
Hexachloroethane	ND	0.050	mg/L	SW846 8270B
Nitrobenzene	ND	0.050	mg/L	SW846 8270B
Pentachlorophenol	ND	0.25	mg/L	SW846 8270B
Pyridine	ND	0.10	mg/L	SW846 8270B
2,4,5-Trichlorophenol	ND	0.050	mg/L	SW846 8270B
2,4,6-Trichlorophenol	ND	0.050	mg/L	SW846 8270B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2-Fluorophenol	42	(21 - 100)
Phenol-d5	31	(10 - 94)
Nitrobenzene-d5	71	(35 - 114)
2-Fluorobiphenyl	65	(43 - 116)
2,4,6-Tribromophenol	77	(10 - 123)
Terphenyl-d14	99	(33 - 141)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.



Quanterra
Environmental Services

METHOD BLANK REPORT

GC/MS Volatiles

Client Lot #...: I8A160124 **Work Order #...:** CF814101 **Matrix.....:** SOLID
MB Lot-Sample #: I8B050000-228

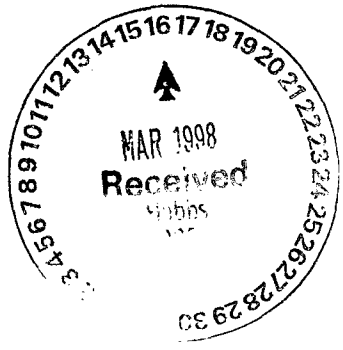
Prep Date.....: 02/05/98 **Analysis Time..:** 00:07
Analysis Date..: 02/06/98 **Prep Batch #...:** 8036228
Dilution Factor: 1

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
Benzene	ND	0.050	mg/L	SW846 8240B
Carbon tetrachloride	ND	0.050	mg/L	SW846 8240B
Chlorobenzene	ND	0.050	mg/L	SW846 8240B
Chloroform	ND	0.050	mg/L	SW846 8240B
1,2-Dichloroethane	ND	0.050	mg/L	SW846 8240B
1,1-Dichloroethylene	ND	0.050	mg/L	SW846 8240B
Methyl ethyl ketone	ND	0.20	mg/L	SW846 8240B
Tetrachloroethylene	ND	0.050	mg/L	SW846 8240B
Trichloroethylene	ND	0.050	mg/L	SW846 8240B
Vinyl chloride	ND	0.10	mg/L	SW846 8240B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
4-Bromofluorobenzene	106	(86 - 115)
1,2-Dichloroethane-d4	99	(76 - 114)
Toluene-d8	103	(88 - 110)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.



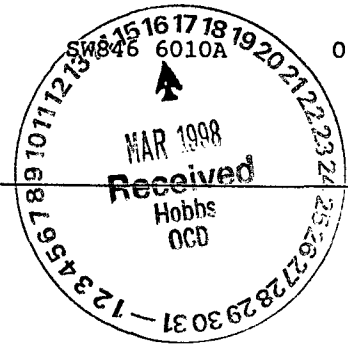
Quanterra
Environmental Services

METHOD BLANK REPORT

TCLP Metals

Client Lot #...: I8A160124 **Matrix.....:** SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
MB Lot-Sample #: I8A210000-228 **Prep Batch #...:** 8026167						
Leach Date.....: 01/21/98 **Leach Batch #..:** P802109						
Mercury	ND	0.0020	mg/L	SW846 7470A	01/26/98	CF1H8107
		Dilution Factor: 1				
		Analysis Time..: 15:44				
MB Lot-Sample #: I8A210000-228 **Prep Batch #...:** 8023178						
Leach Date.....: 01/21/98 **Leach Batch #..:** P802109						
Silver	ND	0.50	mg/L	SW846 6010A	01/23-01/26/98	CF1H8108
		Dilution Factor: 1				
		Analysis Time..: 12:28				
Arsenic	ND	0.50	mg/L	SW846 6010A	01/23-01/26/98	CF1H8101
		Dilution Factor: 1				
		Analysis Time..: 12:28				
Barium	ND	10.0	mg/L	SW846 6010A	01/23-01/26/98	CF1H8102
		Dilution Factor: 1				
		Analysis Time..: 12:28				
Cadmium	ND	0.10	mg/L	SW846 6010A	01/23-01/26/98	CF1H8103
		Dilution Factor: 1				
		Analysis Time..: 12:28				
Chromium	ND	0.50	mg/L	SW846 6010A	01/23-01/26/98	CF1H8104
		Dilution Factor: 1				
		Analysis Time..: 12:28				
Lead	ND	0.50	mg/L	SW846 6010A	01/23-01/26/98	CF1H8105
		Dilution Factor: 1				
		Analysis Time..: 12:28				
Selenium	ND	0.25	mg/L	SW846 6010A	01/23-01/26/98	CF1H8106
		Dilution Factor: 1				
		Analysis Time..: 12:28				



NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Quanterra
Environmental Services

METHOD BLANK REPORT

General Chemistry

Client Lot #...: I8A160124 **Matrix.....:** SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Reactive Cyanide		Work Order #: CF216101		MB Lot-Sample #:	I8A220000-182	
	ND	200	mg/kg	SW846 7.3.3	01/21-01/22/98	8022182
		Dilution Factor: 1				
		Analysis Time..: 11:16				
Reactive Sulfide		Work Order #: CF22G101		MB Lot-Sample #:	I8A220000-189	
	ND	200	mg/kg	SW846 7.3.4	01/21-01/22/98	8022189
		Dilution Factor: 1				
		Analysis Time..: 14:00				
Total Recoverable Petroleum Hydrocarbons		Work Order #: CF3EH101		MB Lot-Sample #:	I8A260000-164	
	ND	10	mg/kg	MCAWW 418.1	01/26-01/27/98	8026164
		Dilution Factor: 1				
		Analysis Time..: 15:00				

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Quanterra
Environmental Services

LABORATORY CONTROL SAMPLE DATA REPORT

GC/MS Semivolatiles

Client Lot #...: I8A160124 **Work Order #...:** CF3FX101 **Matrix.....:** SOLID
LCS Lot-Sample#: I8A260000-185
Prep Date.....: 01/26/98 **Analysis Date..:** 01/27/98
Prep Batch #...: 8026185 **Analysis Time..:** 21:26
Dilution Factor: 1

PARAMETER	SPIKE AMOUNT	MEASURED AMOUNT	UNITS	PERCENT RECOVERY	METHOD
Pyridine	**0.40**	**0.14**	**mg/L**	**35**	**SW846 8270B**
1,4-Dichlorobenzene	**0.40**	**0.24**	**mg/L**	**60**	**SW846 8270B**
o-Cresol	**0.40**	**0.23**	**mg/L**	**58**	**SW846 8270B**
m-Cresol & p-Cresol	**0.80**	**0.41**	**mg/L**	**51**	**SW846 8270B**
Hexachloroethane	**0.40**	**0.23**	**mg/L**	**57**	**SW846 8270B**
Nitrobenzene	**0.40**	**0.24**	**mg/L**	**61**	**SW846 8270B**
Hexachlorobutadiene	**0.40**	**0.23**	**mg/L**	**57**	**SW846 8270B**
2,4,6-Trichlorophenol	**0.40**	**0.26**	**mg/L**	**64**	**SW846 8270B**
2,4,5-Trichlorophenol	**0.40**	**0.24**	**mg/L**	**60**	**SW846 8270B**
2,4-Dinitrotoluene	**0.40**	**0.25**	**mg/L**	**62**	**SW846 8270B**
Hexachlorobenzene	**0.40**	**0.37**	**mg/L**	**93**	**SW846 8270B**
Pentachlorophenol	**0.40**	**0.37**	**mg/L**	**93**	**SW846 8270B**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2-Fluorophenol	38	(21 - 100)
Phenol-d5	27	(10 - 94)
Nitrobenzene-d5	60	(35 - 114)
2-Fluorobiphenyl	55	(43 - 116)
2,4,6-Tribromophenol	72	(10 - 123)
Terphenyl-d14	102	(33 - 141)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

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Environmental Services

LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC/MS Semivolatiles

Client Lot #...: I8A160124 **Work Order #...:** CF3FX101 **Matrix.....:** SOLID
LCS Lot-Sample#: I8A260000-185
Prep Date.....: 01/26/98 **Analysis Date..:** 01/27/98
Prep Batch #...: 8026185 **Analysis Time..:** 21:26
Dilution Factor: 1

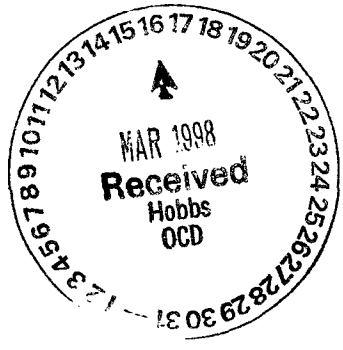
PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	METHOD
Pyridine	**35**	**(1.0- 144)**	**SW846 8270B**
1,4-Dichlorobenzene	**60**	**(26 - 112)**	**SW846 8270B**
o-Cresol	**58**	**(21 - 137)**	**SW846 8270B**
m-Cresol & p-Cresol	**51**	**(19 - 126)**	**SW846 8270B**
Hexachloroethane	**57**	**(26 - 102)**	**SW846 8270B**
Nitrobenzene	**61**	**(42 - 120)**	**SW846 8270B**
Hexachlorobutadiene	**57**	**(33 - 111)**	**SW846 8270B**
2,4,6-Trichlorophenol	**64**	**(19 - 122)**	**SW846 8270B**
2,4,5-Trichlorophenol	**60**	**(29 - 123)**	**SW846 8270B**
2,4-Dinitrotoluene	**62**	**(31 - 106)**	**SW846 8270B**
Hexachlorobenzene	**93**	**(42 - 120)**	**SW846 8270B**
Pentachlorophenol	**93**	**(12 - 156)**	**SW846 8270B**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2-Fluorophenol	38	(21 - 100)
Phenol-d5	27	(10 - 94)
Nitrobenzene-d5	60	(35 - 114)
2-Fluorobiphenyl	55	(43 - 116)
2,4,6-Tribromophenol	72	(10 - 123)
Terphenyl-d14	102	(33 - 141)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters



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LABORATORY CONTROL SAMPLE DATA REPORT

GC/MS Volatiles

Client Lot #...: I8A160124 **Work Order #...:** CF814102 **Matrix.....:** SOLID
LCS Lot-Sample#: I8B050000-228
Prep Date.....: 02/05/98 **Analysis Date..:** 02/05/98
Prep Batch #...: 8036228 **Analysis Time..:** 23:36
Dilution Factor: 1

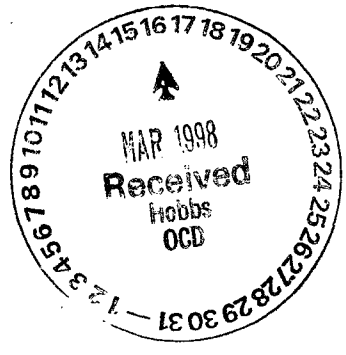
PARAMETER	SPIKE AMOUNT	MEASURED AMOUNT	UNITS	PERCENT RECOVERY	METHOD
Vinyl chloride	**0.50**	**0.47**	**mg/L**	**94**	**SW846 8240B**
1,1-Dichloroethylene	**0.50**	**0.53**	**mg/L**	**106**	**SW846 8240B**
Chloroform	**0.50**	**0.51**	**mg/L**	**103**	**SW846 8240B**
1,2-Dichloroethane	**0.50**	**0.52**	**mg/L**	**105**	**SW846 8240B**
Methyl ethyl ketone	**0.50**	**0.41**	**mg/L**	**82**	**SW846 8240B**
Carbon tetrachloride	**0.50**	**0.49**	**mg/L**	**98**	**SW846 8240B**
Trichloroethylene	**0.50**	**0.52**	**mg/L**	**103**	**SW846 8240B**
Benzene	**0.50**	**0.52**	**mg/L**	**104**	**SW846 8240B**
Tetrachloroethylene	**0.50**	**0.53**	**mg/L**	**105**	**SW846 8240B**
Chlorobenzene	**0.50**	**0.53**	**mg/L**	**107**	**SW846 8240B**
1,4-Dichlorobenzene	**0.50**	**0.52**	**mg/L**	**105**	**SW846 8240B**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
4-Bromofluorobenzene	102	(86 - 115)
1,2-Dichloroethane-d4	97	(76 - 114)
Toluene-d8	100	(88 - 110)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters



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LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC/MS Volatiles

Client Lot #...: I8A160124 **Work Order #...:** CF814102 **Matrix.....:** SOLID
LCS Lot-Sample#: I8B050000-228
Prep Date.....: 02/05/98 **Analysis Date..:** 02/05/98
Prep Batch #...: 8036228 **Analysis Time..:** 23:36
Dilution Factor: 1

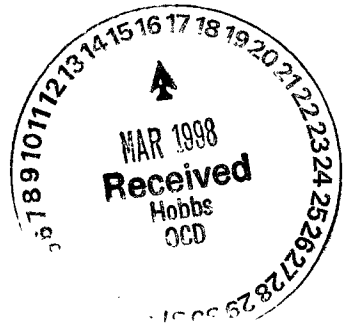
PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	METHOD
Vinyl chloride	**94**	**(1.0- 251)**	**SW846 8240B**
1,1-Dichloroethylene	**106**	**(59 - 155)**	**SW846 8240B**
Chloroform	**103**	**(51 - 136)**	**SW846 8240B**
1,2-Dichloroethane	**105**	**(49 - 155)**	**SW846 8240B**
Methyl ethyl ketone	**82**	**(25 - 250)**	**SW846 8240B**
Carbon tetrachloride	**98**	**(71 - 240)**	**SW846 8240B**
Trichloroethylene	**103**	**(71 - 157)**	**SW846 8240B**
Benzene	**104**	**(37 - 151)**	**SW846 8240B**
Tetrachloroethylene	**105**	**(46 - 157)**	**SW846 8240B**
Chlorobenzene	**107**	**(37 - 160)**	**SW846 8240B**
1,4-Dichlorobenzene	**105**	**(75 - 137)**	**SW846 8240B**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
4-Bromofluorobenzene	102	(86 - 115)
1,2-Dichloroethane-d4	97	(76 - 114)
Toluene-d8	100	(88 - 110)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters



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LABORATORY CONTROL SAMPLE DATA REPORT

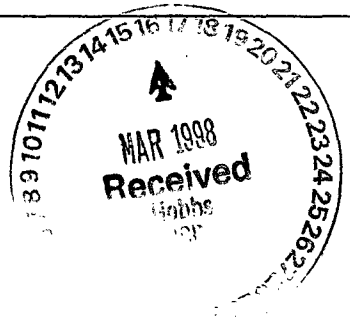
TCLP Metals

Client Lot #...: I8A160124 **Matrix.....:** SOLID

PARAMETER	SPIKE AMOUNT	MEASURED AMOUNT	UNITS	PERCNT RECVRY	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
LCS Lot-Sample#: I8A230000-178 **Prep Batch #...:** 8023178							
Arsenic	2.0	2.1	mg/L	106	SW846 6010A	01/23-01/26/98	CF2HC101
		Dilution Factor: 1					
		Analysis Time..: 12:30					
Barium	2.0	2.1	mg/L	105	SW846 6010A	01/23-01/26/98	CF2HC102
		Dilution Factor: 1					
		Analysis Time..: 12:30					
Cadmium	0.050	0.050	mg/L	101	SW846 6010A	01/23-01/26/98	CF2HC103
		Dilution Factor: 1					
		Analysis Time..: 12:30					
Chromium	0.20	0.21	mg/L	104	SW846 6010A	01/23-01/26/98	CF2HC104
		Dilution Factor: 1					
		Analysis Time..: 12:30					
Lead	0.50	0.51	mg/L	102	SW846 6010A	01/23-01/26/98	CF2HC105
		Dilution Factor: 1					
		Analysis Time..: 12:30					
Selenium	2.0	2.1	mg/L	105	SW846 6010A	01/23-01/26/98	CF2HC106
		Dilution Factor: 1					
		Analysis Time..: 12:30					
Silver	0.050	0.046	mg/L	93	SW846 6010A	01/23-01/26/98	CF2HC107
		Dilution Factor: 1					
		Analysis Time..: 12:30					
LCS Lot-Sample#: I8A260000-167 **Prep Batch #...:** 8026167							
Mercury	0.0050	0.0053	mg/L	105	SW846 7470A	01/26/98	CF3F0101
		Dilution Factor: 1					
		Analysis Time..: 15:46					

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.



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LABORATORY CONTROL SAMPLE EVALUATION REPORT

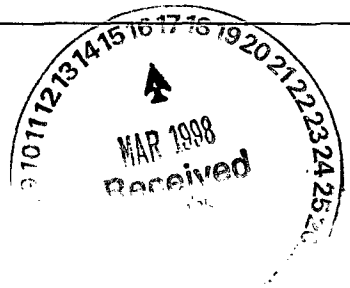
TCLP Metals

Client Lot #...: I8A160124 **Matrix.....:** SOLID

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
LCS Lot-Sample#: I8A230000-178 **Prep Batch #...:** 8023178					
Arsenic	106	(80 - 120)	SW846 6010A	01/23-01/26/98	CF2HC101
		Dilution Factor: 1			
		Analysis Time..: 12:30			
Barium	105	(80 - 120)	SW846 6010A	01/23-01/26/98	CF2HC102
		Dilution Factor: 1			
		Analysis Time..: 12:30			
Cadmium	101	(80 - 120)	SW846 6010A	01/23-01/26/98	CF2HC103
		Dilution Factor: 1			
		Analysis Time..: 12:30			
Chromium	104	(80 - 120)	SW846 6010A	01/23-01/26/98	CF2HC104
		Dilution Factor: 1			
		Analysis Time..: 12:30			
Lead	102	(80 - 120)	SW846 6010A	01/23-01/26/98	CF2HC105
		Dilution Factor: 1			
		Analysis Time..: 12:30			
Selenium	105	(80 - 120)	SW846 6010A	01/23-01/26/98	CF2HC106
		Dilution Factor: 1			
		Analysis Time..: 12:30			
Silver	93	(80 - 120)	SW846 6010A	01/23-01/26/98	CF2HC107
		Dilution Factor: 1			
		Analysis Time..: 12:30			
LCS Lot-Sample#: I8A260000-167 **Prep Batch #...:** 8026167					
Mercury	105	(80 - 120)	SW846 7470A	01/26/98	CF3F0101
		Dilution Factor: 1			
		Analysis Time..: 15:46			

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.



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LABORATORY CONTROL SAMPLE DATA REPORT

General Chemistry

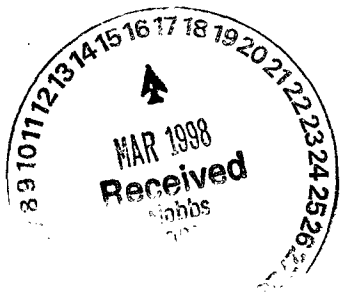
Client Lot #...: I8A160124 **Matrix.....:** SOLID

PARAMETER	SPIKE AMOUNT	MEASURED AMOUNT	UNITS	PERCNT RECVRY	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Flashpoint			Work Order #: CF3CV101 LCS Lot-Sample#: I8A260000-151				
	81	80	deg F	98	SW846 1010	01/23-01/26/98	8026151
			Dilution Factor: 1				
			Analysis Time..: 14:00				
Reactive Cyanide			Work Order #: CF216102 LCS Lot-Sample#: I8A220000-182				
	40	0.19 N	mg/kg	0.46	SW846 7.3.3	01/21-01/22/98	8022182
			Dilution Factor: 1				
			Analysis Time..: 11:16				
Total Recoverable Petroleum Hydrocarbons			Work Order #: CF3EH102 LCS Lot-Sample#: I8A260000-164				
	250	240	mg/kg	96	MCAWW 418.1	01/26-01/27/98	8026164
			Dilution Factor: 1				
			Analysis Time..: 15:00				

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

N Spiked analyte recovery is outside stated control limits.



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LABORATORY CONTROL SAMPLE EVALUATION REPORT

General Chemistry

Client Lot #...: I8A160124 **Matrix.....:** SOLID

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Flashpoint		Work Order #: CF3CV101	LCS Lot-Sample#: I8A260000-151		
	98	(95 - 105)	SW846 1010	01/23-01/26/98	8026151
		Dilution Factor: 1			
		Analysis Time..: 14:00			
Reactive Cyanide		Work Order #: CF216102	LCS Lot-Sample#: I8A220000-182		
	0.46 N	(1.0- 64)	SW846 7.3.3	01/21-01/22/98	8022182
		Dilution Factor: 1			
		Analysis Time..: 11:16			
Total Recoverable Petroleum Hydrocarbons		Work Order #: CF3EH102	LCS Lot-Sample#: I8A260000-164		
	96	(70 - 130)	MCAWW 418.1	01/26-01/27/98	8026164
		Dilution Factor: 1			
		Analysis Time..: 15:00			

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

N Spiked analyte recovery is outside stated control limits.

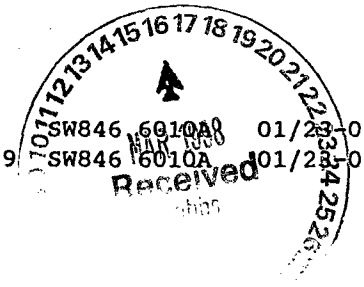
Quanterra
Environmental Services

MATRIX SPIKE SAMPLE DATA REPORT

TCLP Metals

Client Lot #...: I8A160124 **Matrix.....:** SOLID
Date Sampled...: 01/14/98 10:10 **Date Received..:** 01/15/98

PARAMETER	SAMPLE AMOUNT	SPIKE AMT	MEASURED AMOUNT	UNITS	PERCNT RECVRY	RPD	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
MS Lot-Sample #: I8A160124-001 **Prep Batch #...:** 8023178									
Leach Date.....: 01/21/98 **Leach Batch #..:** P802109									
Silver									
	ND	1.0	0.98	mg/L	97		SW846 6010A	01/23-01/26/98	CEX9V114
	ND	1.0	0.96	mg/L	95	1.8	SW846 6010A	01/23-01/26/98	CEX9V115
			Dilution Factor: 2						
			Analysis Time..: 12:37						
Arsenic									
	ND	5.0	5.1	mg/L	102		SW846 6010A	01/23-01/26/98	CEX9V10P
	ND	5.0	5.0	mg/L	100	2.4	SW846 6010A	01/23-01/26/98	CEX9V10Q
			Dilution Factor: 2						
			Analysis Time..: 12:37						
Barium									
	ND	50.0	49.3	mg/L	97		SW846 6010A	01/23-01/26/98	CEX9V10R
	ND	50.0	48.7	mg/L	96	1.1	SW846 6010A	01/23-01/26/98	CEX9V10T
			Dilution Factor: 2						
			Analysis Time..: 12:37						
Cadmium									
	ND	1.0	0.99	mg/L	97		SW846 6010A	01/23-01/26/98	CEX9V10U
	ND	1.0	0.98	mg/L	97	0.80	SW846 6010A	01/23-01/26/98	CEX9V10V
			Dilution Factor: 2						
			Analysis Time..: 12:37						
Chromium									
	ND	5.0	4.9	mg/L	98		SW846 6010A	01/23-01/26/98	CEX9V10W
	ND	5.0	4.9	mg/L	98	0.78	SW846 6010A	01/23-01/26/98	CEX9V10X
			Dilution Factor: 2						
			Analysis Time..: 12:37						
Lead									
	ND	5.0	4.9	mg/L	98		SW846 6010A	01/23-01/26/98	CEX9V110
	ND	5.0	4.9	mg/L	99	0.95	SW846 6010A	01/23-01/26/98	CEX9V111
			Dilution Factor: 2						
			Analysis Time..: 12:37						
Selenium									
	ND	1.0	0.96	mg/L	96		SW846 6010A	01/23-01/26/98	CEX9V112
	ND	1.0	0.93	mg/L	93	2.9	SW846 6010A	01/23-01/26/98	CEX9V113
			Dilution Factor: 2						
			Analysis Time..: 12:37						



MS Lot-Sample #: I8A160124-001 **Prep Batch #...:** 8026167
Leach Date.....: 01/21/98 **Leach Batch #..:** P802109
(Continued on next page)

Quanterra
Environmental Services

MATRIX SPIKE SAMPLE DATA REPORT

TCLP Metals

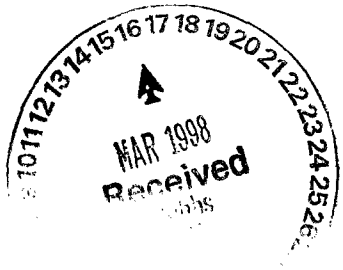
Client Lot #...: I8A160124 **Matrix.....:** SOLID
Date Sampled...: 01/14/98 10:10 **Date Received..:** 01/15/98

PARAMETER	SAMPLE AMOUNT	SPIKE AMT	MEASURED AMOUNT	UNITS	PERCNT RECVRY	RPD	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
Mercury									
	ND	0.001	0.0010	mg/L	90		SW846 7470A	01/26/98	CEX9V119
	ND	0.001	0.0010	mg/L	89	1.0	SW846 7470A	01/26/98	CEX9V11A

Dilution Factor: 1
Analysis Time..: 15:55

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.



Quanterra
Environmental Services

MATRIX SPIKE SAMPLE EVALUATION REPORT

TCLP Metals

Client Lot #...: I8A160124 **Matrix.....:** SOLID
Date Sampled...: 01/14/98 10:10 **Date Received..:** 01/15/98

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
MS Lot-Sample #: I8A160124-001 **Prep Batch #...:** 8023178							
Leach Date.....: 01/21/98 **Leach Batch #..:** P802109							
Silver	97	(80 - 120)			SW846 6010A	01/23-01/26/98	CEX9V114
	95	(80 - 120)	1.8	(0-20)	SW846 6010A	01/23-01/26/98	CEX9V115
		Dilution Factor: 2					
		Analysis Time..: 12:37					
Arsenic	102	(80 - 120)			SW846 6010A	01/23-01/26/98	CEX9V10P
	100	(80 - 120)	2.4	(0-20)	SW846 6010A	01/23-01/26/98	CEX9V10Q
		Dilution Factor: 2					
		Analysis Time..: 12:37					
Barium	97	(80 - 120)			SW846 6010A	01/23-01/26/98	CEX9V10R
	96	(80 - 120)	1.1	(0-20)	SW846 6010A	01/23-01/26/98	CEX9V10T
		Dilution Factor: 2					
		Analysis Time..: 12:37					
Cadmium	97	(80 - 120)			SW846 6010A	01/23-01/26/98	CEX9V10U
	97	(80 - 120)	0.80	(0-20)	SW846 6010A	01/23-01/26/98	CEX9V10V
		Dilution Factor: 2					
		Analysis Time..: 12:37					
Chromium	98	(80 - 120)			SW846 6010A	01/23-01/26/98	CEX9V10W
	98	(80 - 120)	0.78	(0-20)	SW846 6010A	01/23-01/26/98	CEX9V10X
		Dilution Factor: 2					
		Analysis Time..: 12:37					
Lead	98	(80 - 120)			SW846 6010A	01/23-01/26/98	CEX9V110
	99	(80 - 120)	0.95	(0-20)	SW846 6010A	01/23-01/26/98	CEX9V111
		Dilution Factor: 2					
		Analysis Time..: 12:37					
Selenium	96	(80 - 120)			SW846 6010A	01/23-01/26/98	CEX9V112
	93	(80 - 120)	2.9	(0-20)	SW846 6010A	01/23-01/26/98	CEX9V113
		Dilution Factor: 2					
		Analysis Time..: 12:37					
MS Lot-Sample #: I8A160124-001 **Prep Batch #...:** 8026167							
Leach Date.....: 01/21/98 **Leach Batch #..:** P802109							
Mercury	90	(75 - 125)			SW846 7470A	01/26/98	CEX9V119
	89	(75 - 125)	1.0	(0-20)	SW846 7470A	01/26/98	CEX9V11A
		Dilution Factor: 1					
		Analysis Time..: 15:55					

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NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

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Environmental Services

MATRIX SPIKE SAMPLE DATA REPORT

TCLP GC/MS Semivolatiles

Client Lot #...: I8A160124 Work Order #...: CEX9V11C-MS Matrix.....: SOLID
MS Lot-Sample #: I8A160124-001 CEX9V11D-MSD
Date Sampled...: 01/14/98 08:30 Date Received..: 01/16/98
Leach Date.....: 01/21/98 Prep Date.....: 01/26/98 Analysis Date..: 01/27/98
Leach Batch #..: P802109 Prep Batch #...: 8026185 Analysis Time..: 22:26
Dilution Factor: 1

PARAMETER	SAMPLE AMOUNT	SPIKE AMT	MEASRD AMOUNT	UNITS	PERCENT RECOVERY	RPD	METHOD
o-Cresol	ND	0.40	0.28	mg/L	71		SW846 8270B
	ND	0.40	0.29	mg/L	72	1.9	SW846 8270B
m-Cresol & p-Cresol	ND	0.80	0.51	mg/L	64		SW846 8270B
	ND	0.80	0.54	mg/L	67	4.9	SW846 8270B
1,4-Dichlorobenzene	ND	0.40	0.28	mg/L	70		SW846 8270B
	ND	0.40	0.28	mg/L	71	0.93	SW846 8270B
2,4-Dinitrotoluene	ND	0.40	0.35	mg/L	87		SW846 8270B
	ND	0.40	0.33	mg/L	82	5.8	SW846 8270B
Hexachlorobenzene	ND	0.40	0.37	mg/L	92		SW846 8270B
	ND	0.40	0.35	mg/L	86	6.5	SW846 8270B
Hexachlorobutadiene	ND	0.40	0.29	mg/L	72		SW846 8270B
	ND	0.40	0.30	mg/L	74	3.1	SW846 8270B
Hexachloroethane	ND	0.40	0.28	mg/L	69		SW846 8270B
	ND	0.40	0.28	mg/L	70	1.3	SW846 8270B
Nitrobenzene	ND	0.40	0.32	mg/L	79		SW846 8270B
	ND	0.40	0.32	mg/L	80	0.80	SW846 8270B
Pentachlorophenol	ND	0.40	0.43	mg/L	107		SW846 8270B
	ND	0.40	0.41	mg/L	102	4.4	SW846 8270B
Pyridine	ND	0.40	0.19	mg/L	48		SW846 8270B
	ND	0.40	0.20	mg/L	49	2.6	SW846 8270B
2,4,5-Trichlorophenol	ND	0.40	0.39	mg/L	97		SW846 8270B
	ND	0.40	0.36	mg/L	90	7.3	SW846 8270B
2,4,6-Trichlorophenol	ND	0.40	0.36	mg/L	90		SW846 8270B
	ND	0.40	0.34	mg/L	86	4.3	SW846 8270B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2-Fluorophenol	46	(21 - 100)
	46	(21 - 100)
Phenol-d5	34	(10 - 94)
	34	(10 - 94)
Nitrobenzene-d5	78	(35 - 114)
	79	(35 - 114)
2-Fluorobiphenyl	73	(43 - 116)
	74	(43 - 116)
2,4,6-Tribromophenol	102	(10 - 123)
	95	(10 - 123)
Terphenyl-d14	101	(33 - 141)
	99	(33 - 141)

MAR 1998 Received

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

Quanterra
Environmental Services

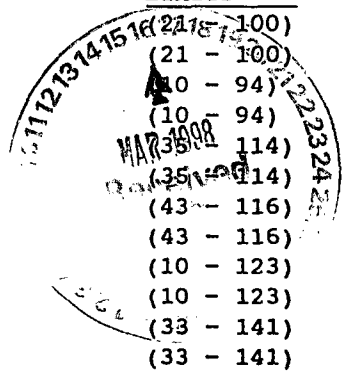
MATRIX SPIKE SAMPLE EVALUATION REPORT

TCLP GC/MS Semivolatiles

Client Lot #...:	I8A160124	**Work Order #...:**	CEX9V11C-MS	**Matrix.....:**	SOLID
MS Lot-Sample #:	I8A160124-001		CEX9V11D-MSD		
Date Sampled...:	01/14/98 08:30	**Date Received..:**	01/16/98		
Leach Date.....:	01/21/98	**Prep Date.....:**	01/26/98	**Analysis Date..:**	01/27/98
Leach Batch #..:	P802109	**Prep Batch #...:**	8026185	**Analysis Time..:**	22:26
Dilution Factor:	1				

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD
o-Cresol	**71**	**(21 - 137)**			**SW846 8270B**
	72	**(21 - 137)**	**1.9**	**(0-70)**	**SW846 8270B**
m-Cresol & p-Cresol	**64**	**(19 - 126)**			**SW846 8270B**
	67	**(19 - 126)**	**4.9**	**(0-94)**	**SW846 8270B**
1,4-Dichlorobenzene	**70**	**(26 - 112)**			**SW846 8270B**
	71	**(26 - 112)**	**0.93**	**(0-40)**	**SW846 8270B**
2,4-Dinitrotoluene	**87**	**(31 - 106)**			**SW846 8270B**
	82	**(31 - 106)**	**5.8**	**(0-55)**	**SW846 8270B**
Hexachlorobenzene	**92**	**(42 - 120)**			**SW846 8270B**
	86	**(42 - 120)**	**6.5**	**(0-39)**	**SW846 8270B**
Hexachlorobutadiene	**72**	**(33 - 111)**			**SW846 8270B**
	74	**(33 - 111)**	**3.1**	**(0-40)**	**SW846 8270B**
Hexachloroethane	**69**	**(26 - 102)**			**SW846 8270B**
	70	**(26 - 102)**	**1.3**	**(0-44)**	**SW846 8270B**
Nitrobenzene	**79**	**(42 - 120)**			**SW846 8270B**
	80	**(42 - 120)**	**0.80**	**(0-40)**	**SW846 8270B**
Pentachlorophenol	**107**	**(12 - 156)**			**SW846 8270B**
	102	**(12 - 156)**	**4.4**	**(0-76)**	**SW846 8270B**
Pyridine	**48**	**(1.0- 144)**			**SW846 8270B**
	49	**(1.0- 144)**	**2.6**	**(0-95)**	**SW846 8270B**
2,4,5-Trichlorophenol	**97**	**(29 - 123)**			**SW846 8270B**
	90	**(29 - 123)**	**7.3**	**(0-63)**	**SW846 8270B**
2,4,6-Trichlorophenol	**90**	**(19 - 122)**			**SW846 8270B**
	86	**(19 - 122)**	**4.3**	**(0-64)**	**SW846 8270B**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2-Fluorophenol	46	(21 - 100)
	46	(21 - 100)
Phenol-d5	34	(10 - 94)
	34	(10 - 94)
Nitrobenzene-d5	78	(35 - 114)
	79	(35 - 114)
2-Fluorobiphenyl	73	(43 - 116)
	74	(43 - 116)
2,4,6-Tribromophenol	102	(10 - 123)
	95	(10 - 123)
Terphenyl-d14	101	(33 - 141)
	99	(33 - 141)



NOTE(S):

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Bold print denotes control parameters

Quanterra
Environmental Services

MATRIX SPIKE SAMPLE DATA REPORT

TCLP GC/MS Volatiles

Client Lot #...:	I8A160124	**Work Order #...:**	CEX9V11E-MS	**Matrix.....:**	SOLID
MS Lot-Sample #:	I8A160124-001		CEX9V11F-MSD		
Date Sampled...:	01/14/98 08:30	**Date Received..:**	01/16/98		
Leach Date.....:	01/21/98	**Prep Date.....:**	02/05/98	**Analysis Date..:**	02/06/98
Leach Batch #..:	P802108	**Prep Batch #...:**	8036228	**Analysis Time..:**	00:39
Dilution Factor:	1				

PARAMETER	SAMPLE AMOUNT	SPIKE AMT	MEASRD AMOUNT	UNITS	PERCENT RECOVERY	RPD	METHOD
Benzene	**ND**	**0.50**	**0.51**	**mg/L**	**101**		**SW846 8240B**
	ND	**0.50**	**0.50**	**mg/L**	**99**	**2.4**	**SW846 8240B**
Carbon tetrachloride	**ND**	**0.50**	**0.45**	**mg/L**	**91**		**SW846 8240B**
	ND	**0.50**	**0.45**	**mg/L**	**89**	**1.8**	**SW846 8240B**
Chlorobenzene	**ND**	**0.50**	**0.51**	**mg/L**	**102**		**SW846 8240B**
	ND	**0.50**	**0.51**	**mg/L**	**101**	**0.05**	**SW846 8240B**
Chloroform	**ND**	**0.50**	**0.49**	**mg/L**	**97**		**SW846 8240B**
	ND	**0.50**	**0.48**	**mg/L**	**96**	**1.0**	**SW846 8240B**
1,2-Dichloroethane	**ND**	**0.50**	**0.53**	**mg/L**	**106**		**SW846 8240B**
	ND	**0.50**	**0.53**	**mg/L**	**105**	**0.18**	**SW846 8240B**
1,1-Dichloroethylene	**ND**	**0.50**	**0.43**	**mg/L**	**85**		**SW846 8240B**
	ND	**0.50**	**0.42**	**mg/L**	**84**	**1.5**	**SW846 8240B**
Methyl ethyl ketone	**ND**	**0.50**	**0.50**	**mg/L**	**99**		**SW846 8240B**
	ND	**0.50**	**0.47**	**mg/L**	**93**	**5.9**	**SW846 8240B**
Tetrachloroethylene	**ND**	**0.50**	**0.51**	**mg/L**	**102**		**SW846 8240B**
	ND	**0.50**	**0.49**	**mg/L**	**99**	**3.2**	**SW846 8240B**
Trichloroethylene	**ND**	**0.50**	**0.49**	**mg/L**	**99**		**SW846 8240B**
	ND	**0.50**	**0.48**	**mg/L**	**96**	**3.2**	**SW846 8240B**
Vinyl chloride	**ND**	**0.50**	**0.51**	**mg/L**	**103**		**SW846 8240B**
	ND	**0.50**	**0.49**	**mg/L**	**97**	**5.4**	**SW846 8240B**
1,4-Dichlorobenzene	**ND**	**0.50**	**0.51**	**mg/L**	**101**		**SW846 8240B**
	ND	**0.50**	**0.49**	**mg/L**	**98**	**3.1**	**SW846 8240B**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
4-Bromofluorobenzene	100	(86 - 115)
	101	(86 - 115)
1,2-Dichloroethane-d4	99	(76 - 114)
	101	(76 - 114)
Toluene-d8	94	(88 - 110)
	97	(88 - 110)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

Quanterra
Environmental Services

MATRIX SPIKE SAMPLE EVALUATION REPORT

TCLP GC/MS Volatiles

Client Lot #...:	I8A160124	**Work Order #...:**	CEX9V11E-MS	**Matrix.....:**	SOLID
MS Lot-Sample #:	I8A160124-001		CEX9V11F-MSD		
Date Sampled...:	01/14/98 08:30	**Date Received..:**	01/16/98		
Leach Date.....:	01/21/98	**Prep Date.....:**	02/05/98	**Analysis Date..:**	02/06/98
Leach Batch #..:	P802108	**Prep Batch #...:**	8036228	**Analysis Time..:**	00:39
Dilution Factor:	1				

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD
Benzene	**101**	**(37 - 151)**			**SW846 8240B**
	99	**(37 - 151)**	**2.4**	**(0-30)**	**SW846 8240B**
Carbon tetrachloride	**91**	**(71 - 240)**			**SW846 8240B**
	89	**(71 - 240)**	**1.8**	**(0-30)**	**SW846 8240B**
Chlorobenzene	**102**	**(37 - 160)**			**SW846 8240B**
	101	**(37 - 160)**	**0.05**	**(0-30)**	**SW846 8240B**
Chloroform	**97**	**(51 - 136)**			**SW846 8240B**
	96	**(51 - 136)**	**1.0**	**(0-30)**	**SW846 8240B**
1,2-Dichloroethane	**106**	**(49 - 155)**			**SW846 8240B**
	105	**(49 - 155)**	**0.18**	**(0-30)**	**SW846 8240B**
1,1-Dichloroethylene	**85**	**(59 - 155)**			**SW846 8240B**
	84	**(59 - 155)**	**1.5**	**(0-30)**	**SW846 8240B**
Methyl ethyl ketone	**99**	**(25 - 250)**			**SW846 8240B**
	93	**(25 - 250)**	**5.9**	**(0-30)**	**SW846 8240B**
Tetrachloroethylene	**102**	**(46 - 157)**			**SW846 8240B**
	99	**(46 - 157)**	**3.2**	**(0-30)**	**SW846 8240B**
Trichloroethylene	**99**	**(71 - 157)**			**SW846 8240B**
	96	**(71 - 157)**	**3.2**	**(0-30)**	**SW846 8240B**
Vinyl chloride	**103**	**(1.0- 251)**			**SW846 8240B**
	97	**(1.0- 251)**	**5.4**	**(0-30)**	**SW846 8240B**
1,4-Dichlorobenzene	**101**	**(75 - 137)**			**SW846 8240B**
	98	**(75 - 137)**	**3.1**	**(0-30)**	**SW846 8240B**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
4-Bromofluorobenzene	100	(86 - 115)
	101	(86 - 115)
1,2-Dichloroethane-d4	99	(76 - 114)
	101	(76 - 114)
Toluene-d8	94	(88 - 110)
	97	(88 - 110)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

Quanterra
Environmental Services

MATRIX SPIKE SAMPLE DATA REPORT

General Chemistry

Client Lot #...: I8A160124 **Matrix.....:** SOLID
Date Sampled...: 01/14/98 10:10 **Date Received..:** 01/15/98

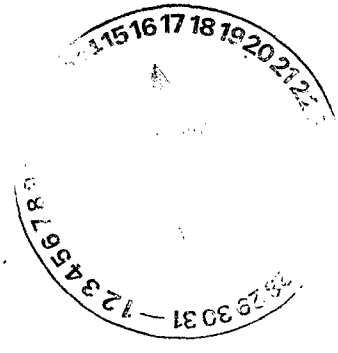
PARAMETER	SAMPLE AMOUNT	SPIKE AMT	MEASURED AMOUNT	UNITS	PERCNT RECVRY	RPD	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Reactive Cyanide			WO#: CEX9V10K-MS/CEX9V10L-MSD				MS Lot-Sample #: I8A160124-001		
	ND	61	8.0	mg/kg	12		SW846 7.3.3	01/21-01/22/98	8022182
	ND	61	7.9	mg/kg	11	2.2	SW846 7.3.3	01/21-01/22/98	8022182
			Dilution Factor: 1						
			Analysis Time..: 11:16						
Total Recoverable Petroleum Hydrocarbons			WO#: CEX9V117-MS/CEX9V118-MSD				MS Lot-Sample #: I8A160124-001		
	19000	380	17000 NC	mg/kg			MCAWW 418.1	01/26-01/27/98	8026164
	19000	380	15000 NC	mg/kg			MCAWW 418.1	01/26-01/27/98	8026164
			Dilution Factor: 1						
			Analysis Time..: 15:00						

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Results and reporting limits have been adjusted for dry weight.

NC The recovery and RPD were not calculated.



Quanterra
Environmental Services

MATRIX SPIKE SAMPLE EVALUATION REPORT

General Chemistry

Client Lot #...: I8A160124 **Matrix.....:** SOLID
Date Sampled...: 01/14/98 10:10 **Date Received..:** 01/15/98

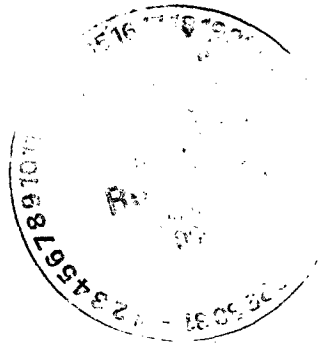
PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Reactive Cyanide		WO#: CEX9V10K-MS/CEX9V10L-MSD				MS Lot-Sample #: I8A160124-001	
	12	(1.0 - 64)			SW846 7.3.3	01/21-01/22/98	8022182
	11	(1.0 - 64)	2.2	(0-213)	SW846 7.3.3	01/21-01/22/98	8022182
		Dilution Factor: 1					
		Analysis Time..: 11:16					
Total Recoverable Petroleum Hydrocarbons		WO#: CEX9V117-MS/CEX9V118-MSD				MS Lot-Sample #: I8A160124-001	
	NC	(70 - 130)			MCAWW 418.1	01/26-01/27/98	8026164
	NC	(70 - 130)		(0-30)	MCAWW 418.1	01/26-01/27/98	8026164
		Dilution Factor: 1					
		Analysis Time..: 15:00					

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Results and reporting limits have been adjusted for dry weight.

NC The recovery and RPD were not calculated.



Quanterra
Environmental Services

SAMPLE DUPLICATE EVALUATION REPORT

General Chemistry

Client Lot #...: I8A160124 **Work Order #...:** CEWL7-SMP CEWL7-DUP **Matrix.....:** SOLID

Date Sampled...: 01/14/98 10:10 **Date Received..:** 01/15/98

% Moisture.....: 15

PARAM	RESULT	DUPLICATE RESULT	UNITS	RPD	RPD LIMIT	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Percent Moisture						SD Lot-Sample #: I8A150110-020		
	14.8	15.4	%	4.0	(0-14)	OCLP OLM03.1	01/20-01/21/98	8020237

Dilution Factor: 1
Analysis Time..: 00:00

Quanterra
Environmental Services

SAMPLE DUPLICATE EVALUATION REPORT

General Chemistry

Client Lot #...: I8A160124 **Work Order #...:** CEX9V-SMP CEX9V-DUP **Matrix.....:** SOLID

Date Sampled...: 01/14/98 08:30 **Date Received..:** 01/16/98

% Moisture.....: 34

PARAM	RESULT	DUPLICATE RESULT	UNITS	RPD	RPD LIMIT	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Reactive Cyanide						SD Lot-Sample #: I8A160124-001		
	ND	0.13	mg/kg	154	(0-213)	SW846 7.3.3	01/21-01/22/98	8022182
		Dilution Factor: 1						
		Analysis Time..: 11:16						
Reactive Sulfide						SD Lot-Sample #: I8A160124-001		
	ND	ND	mg/kg	0	(0-20)	SW846 7.3.4	01/21-01/22/98	8022189
		Dilution Factor: 1						
		Analysis Time..: 00:00						
Flashpoint						SD Lot-Sample #: I8A160124-001		
	>150	>150	deg F	0.0	(0-20)	SW846 1010	01/23/98/22/98	8026151
		Dilution Factor: 1						
		Analysis Time..: 00:00						

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Results and reporting limits have been adjusted for dry weight.

Chain of Custody Record

CHAIN OF CUSTODY NUMBER

0007708-001

Quanterra

QUA-4149 (1097)

Client	Project Manager	Date
B.J.SERVICES	DAVID BURKETT	12/16/1997

Page 1 of 1

Address	Telephone Number (Area Code)/Fax Number	Lab Location
2401 SIVLEY	(505) 746-9247 / (281) 363-7528	QUANTERRA - AUSTIN

City	State	Zip Code	Site Contact
ARTESIA	NM	88210	MIKE WIGGINS

Project Number/Name	Carrier/Waybill Number
ARTESIA,NM	Airborne 9136181104

Contract/Purchase Order/Quote Number
CONTRACT / PURCHASE ORDER # : ARTESIA,NM QUOTE: 22015

Sample I.D. Number and Description	Date	Time	Sample Type	Containers: Volume	Containers: Type	Containers: No.	Preservative	Condition on Receipt/Comments	Analysis: %MOISTURE	TRPH	CNRL	SULFIDES	PHENOLS	MMS8270	MMS8021	MMS8015	CORROSIVITY
~~WASH RACK SLUDGE~~	1-14-98	8 ~~AM~~	SOLID	~~1000mL~~	CLEAR GL	1	None	11°C 1/16/98 CK	X	X	X	X	X	X	X	X	X

Special Instructions
INCLUDE COC, LABELED BOTTLES, BLUE ICE,RETURN SHIPPING, CUSTODY SEALS
1 SAMPLE: WASH RACK SLUDGE

Possible Hazard Identification
☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

Sample Disposal
☐ Return To Client ☐ Disposal By Lab ☐ Archive For_____ Months
(A fee may be assessed if samples are retained longer than 3 months)

Turn Around Time Required
☐ Normal ☐ Rush ☐ Other_____

QC Level
☐ I. ☐ II. ☐ III.

Project Specific Requirements (Specify)

	Date	Time		Date	Time
1. Relinquished By: Sam Mabry	12-16-97	1800	1. Received By		
2. Relinquished By: Kelly Chrzyszczyk	12-17-98	0835	2. Received By: Don Hein	1/16/98	0924
3. Relinquished By			3. Received By		

Comments

WHITE - Stays with the Sample; CANARY - Returned to Client with Report; PINK - Field Copy

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
FEB 24 1998
Environmental Bureau
Oil Conservation Division

Form C-1
Originated 8/1

Submit Orig
Plus 1 C
to appropr
District Of

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator BJ Services
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Hobbs Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Sonny's
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 2708 W county Rd Hobbs	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the BJ services Hobbs facility. The material was generated by washing trucks. This material has been approved in the ~~past and the process~~ has not changed. BJ Services is requesting that the current analytical be extended until February 28, 1999. I have included a letter from BJ services requesting this along with a certificate of waste ~~and a chain~~ of custody.

This is the Last Approval For this Analytical Sample Period 1-24-97
Please Notify BJ Services that they Must
Resample & Analyze this Waste Stream
02-015 The OCD will Not Approve an Additional one year extension. MJK

Mailed to Hobbs 2-25-98

Estimated Volume 100 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Environmental Compliance Manager DATE: 02/17/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: 2/23/98

APPROVED BY: Martyn J. Kelly TITLE: Env. Geologist DATE: 2-25-98

February 11, 1998

To: Ken Marsh
CRI

From: Dan Miller
BJ Services

RE: Extension of wash bay analytical

BJ Services would like to extend the current analytical for the wash bay waste stream for another year. The waste stream has not changed since the last analytical was taken.

Sincerely,

Dan Miller
BJ Services
Facility Supervisor

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR B.J SERVICES

ADDRESS 2708 W. County Rd.

GENERATING SITE WASH BAY

COUNTY LEA STATE NM.

TYPE OF WASTE WASH BAY

ESTIMATED VOLUME 100 BBl ±

GENERATING PROCESS WASHing TRUCKS.

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY Sonny's

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT Dan V. Miller
SIGNATURE

NAME DAN V. MILLER
PRINTED

ADDRESS 2708 W. County Road

Hobbs NM

DATE 2.11.98

HOUSTON LABORATORY
6880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

February 12, 1997

Mr. Wesley Root
R & B Environmental
P.O. Box 1022
Hobbs, NM 88240

The following report contains analytical results for samples received at Southern Petroleum Laboratories (SPL) on January 29, 1997. The samples were assigned to Certificate of Analysis No. 9701B55 and analyzed for all parameters as listed on the chain of custody.

There were no analytical problems encountered with this group of samples and all quality control data was within acceptance limits.

If you have any questions or comments pertaining to this data report, please do not hesitate to contact me. Please reference the above Certificate of Analysis No. during any inquiries.

Again, SPL is pleased to be of service to you. We anticipate working with you in fulfilling all your current and future analytical needs.

Southern Petroleum Laboratories

Brett VanDelinder
Project Manager

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

SOUTHERN PETROLEUM LABORATORIES, INC.

Certificate of Analysis Number: 97-01-B55

Approved for Release by:

Brett VanDelinder, Project Manager

Date: 2-12-97

Greg Grandits
Laboratory Director

Idelis Williams
Quality Assurance Officer

The attached analytical data package may not be reproduced except in full without the express written approval of this laboratory.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

DATE: 02/12/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: SLUDGE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	DETECTION LIMIT	UNITS
Silver, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.01	mg/L
Arsenic, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.2	mg/L
Barium, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	1	mg/L
Cadmium, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.01	mg/L
Chromium, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.02	mg/L
Cyanide-Reactive METHOD 7.3.3.1 *** Analyzed by: IP Date: 02/05/97	ND	10	mg/Kg

ND - Not detected.

Notes: *Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA
**Ref: Standard Methods for Examination of Water & Wastewater, 18th ed.
***Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

DATE: 02/12/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: SLUDGE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	DETECTION LIMIT	UNITS
Flash and Fire Point-Cleveland Open Cup Method ASTM D92-85 Analyzed by: TB Date: 02/04/97	>210		°F
Mercury, TCLP Leachate METHOD 7470 *** Analyzed by: PC Date: 02/10/97	ND	0.0004	mg/L
Acid Digestion of Leachate, ICP METHOD 3010A *** Analyzed by: MM Date: 01/31/97	01/31/97		
Lead, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.1	mg/L
Soil pH Measured in Water METHOD 9045C *** Analyzed by: LAR Date: 01/30/97	5.64		pH units
TCLP Leachate extraction METHOD 1311 *** Analyzed by: WLR Date: 01/30/97	01/30/97		

ND - Not detected.

Notes: *Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA
**Ref: Standard Methods for Examination of Water & Wastewater, 18th ed.
***Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

DATE: 02/12/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: SLUDGE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	DETECTION LIMIT	UNITS
TCLP Leachate extraction METHOD 1311 *** Analyzed by: WLR Date: 01/30/97	01/30/97		
Zero Headspace extraction METHOD 1311 Analyzed by: WLR Date: 01/30/97	01/30/97		
Selenium, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.2	mg/L
Sulfide-Reactive METHOD 7.3.4.2 *** Analyzed by: IP Date: 02/05/97	ND	100	mg/Kg

ND - Not detected.

Notes: *Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA
**Ref: Standard Methods for Examination of Water & Wastewater, 18th ed.
***Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

02/12/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: LEACHATE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS	RL ▲
ortho-Cresol	ND	50	ug/L	200000
meta, para-Cresols	ND	100	ug/L	200000
1,4-Dichlorobenzene	ND	50	ug/L	7500
2,4-Dinitrotoluene	ND	50	ug/L	130
Hexachlorobenzene	ND	50	ug/L	130
Hexachlorobutadiene	ND	50	ug/L	500
Hexachloroethane	ND	50	ug/L	3000
Nitrobenzene	ND	50	ug/L	2000
Pentachlorophenol	ND	250	ug/L	100000
Pyridine	ND	50	ug/L	5000
2,4,5-Trichlorophenol	ND	100	ug/L	400000
2,4,6-Trichlorophenol	ND	50	ug/L	2000

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
Nitrobenzene-d5	50 ug/L	106	35	114
2-Fluorobiphenyl	50 ug/L	94	43	116
Terphenyl-d14	50 ug/L	83	33	141
Phenol-d5	75 ug/L	102	10	110
2-Fluorophenol	75 ug/L	88	21	110
2,4,6-Tribromophenol	75 ug/L	85	10	123

ANALYZED BY: PC DATE/TIME: 02/04/97 17:45:00
LEACHATE EXTRACTION BY: SW DATE/TIME: 01/31/97 13:00:00
METHOD: 1311/8270, TCLP Semivolatiles
NOTES: * - Practical Quantitation Limit ND - Not Detected
NA - Not Analyzed
▲ - Regulatory Limit. Reference Federal Register 55, 11862 (3/29/90), RCRA Toxicity Characteristic Final Rule.

COMMENTS:

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

02/12/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: LEACHATE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS	RL ▲
Benzene	190	50	ug/L	500
2-Butanone	ND	200	ug/L	200000
Carbon Tetrachloride	ND	50	ug/L	500
Chlorobenzene	ND	50	ug/L	100000
Chloroform	ND	50	ug/L	6000
1,2-Dichloroethane	ND	50	ug/L	500
1,1-Dichloroethene	ND	50	ug/L	700
Tetrachloroethene	ND	50	ug/L	700
Trichloroethene	ND	50	ug/L	500
Vinyl Chloride	ND	100	ug/L	200

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
4-Bromofluorobenzene	50 ug/L	100	86	115
1,2-Dichloroethane-d4	50 ug/L	96	76	114
Toluene-d8	50 ug/L	105	88	110

ANALYZED BY: GT DATE/TIME: 01/31/97 14:46:00
LEACHATE PREP(ZHE) BY: WLR DATE/TIME: 01/30/97
METHOD: 1311/8240, TCLP Volatiles
NOTES: * - Practical Quantitation Limit ND - Not Detected
NA - Not Analyzed
▲ - Regulatory Limit. Reference Federal Register 55, 11862 (3/29/90), RCRA Toxicity Characteristic Final Rule.

COMMENTS:

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

QUALITY CONTROL

DOCUMENTATION

SPL Labs

RECOVERY REPORT

Client Name:
Client SDG: m970127
Sample Matrix: OTHER
Fraction: VOA
Lab Smp Id: 9701915-01AMS-TCLPV/10X
Level: LOW
Operator: GT
Data Type: MS DATA
SampleType: METHSPIKE
SpikeList File: 9701915-01A
Quant Type: ISTD
Method File: /chem/m.i/m970127.b/m8240bwq.m
Misc Info: M027W1/M027S01/M027CW2

SPIKE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
2 Vinyl Chloride	500	570	114.89	50-150
7 1,1-Dichloroethene	500	550	109.70	50-150
14 2-Butanone	500	400	80.00	30-150
17 Chloroform	500	530	106.64	50-150
20 1,2-Dichloroethane	500	500	100.91	50-150
21 Benzene	500	560	111.11	50-150
22 Carbon Tetrachlori	500	500	99.75	50-150
25 Trichloroethene	500	580	116.70	50-150
36 Tetrachloroethene	500	520	104.88	50-150
38 Chlorobenzene	500	510	102.70	50-150

SURROGATE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
$ 18 1,2-Dichloroethane	50	53	105.57	76-114
$ 31 Toluene-d8	50	52	103.52	88-110
$ 46 Bromofluorobenzene	50	49	98.27	86-115

SPL Labs

RECOVERY REPORT

Client Name:
Client SDG: m970127
Sample Matrix: LIQUID
Fraction: VOA
Lab Smp Id: LCS
Level: LOW
Operator: GT
Data Type: MS DATA
SampleType: METHSPIKE
SpikeList File: 8240water.spk
Quant Type: ISTD
Method File: /chem/m.i/m970127.b/m8240bwq.m
Misc Info: M027W1//M027CW2

	SPIKE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
7	1,1-Dichloroethene	50	53	105.89	61-145
25	Trichloroethene	50	54	108.09	71-120
21	Benzene	50	55	109.40	76-127
32	Toluene	50	53	106.18	76-125
38	Chlorobenzene	50	49	98.07	75-130

	SURROGATE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
$ 18	1,2-Dichloroethane	50	52	103.31	76-114
$ 31	Toluene-d8	50	53	105.46	88-110
$ 46	Bromofluorobenzene	50	49	97.66	86-115

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

SPL Blank QC Report

Matrix: Aqueous
Sample ID: VBLK
Batch: M970131113701

Reported on: 02/03/97 13:20
Analyzed on: 01/31/97 13:32
Analyst: GT

METHOD 8240 M031B01

Compound	Result	Detection Limit	Units
Vinyl Chloride	ND	10	ug/L
1,1-Dichloroethene	ND	5	ug/L
2-Butanone	ND	20	ug/L
Chloroform	ND	5	ug/L
1,2-Dichloroethane	ND	5	ug/L
Benzene	ND	5	ug/L
Carbon Tetrachloride	ND	5	ug/L
Trichloroethene	ND	5	ug/L
Tetrachloroethene	ND	5	ug/L
Chlorobenzene	ND	5	ug/L

Surrogate	Result	QC Criteria	Units
1,2-Dichloroethane-d4	104	76-114	% Recovery
Toluene-d8	108	88-110	% Recovery
Bromofluorobenzene	101	86-115	% Recovery

Samples in Batch 9701B55-01

Notes

ND - Not detected.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

SPL Blank QC Report

Matrix: Leachate
Sample ID: TCLPB0130
Batch: M970131113701

Reported on: 02/03/97 13:20
Analyzed on: 01/31/97 13:54
Analyst: GT

METHOD 8240

Compound	Result	Detection Limit	Units
Vinyl Chloride	ND	10	ug/L
1,1-Dichloroethene	ND	5	ug/L
2-Butanone	ND	20	ug/L
Chloroform	ND	5	ug/L
1,2-Dichloroethane	ND	5	ug/L
Benzene	ND	5	ug/L
Carbon Tetrachloride	ND	5	ug/L
Trichloroethene	ND	5	ug/L
Tetrachloroethene	ND	5	ug/L
Chlorobenzene	ND	5	ug/L

Surrogate	Result	QC Criteria	Units
1,2-Dichloroethane-d4	99	76-114	% Recovery
Toluene-d8	110	88-110	% Recovery
Bromofluorobenzene	100	86-115	% Recovery

Samples in Batch 9701B55-01

Notes

ND - Not detected.

SPL Houston Labs

RECOVERY REPORT

Client Name:
Client SDG: h970108
Sample Matrix: LIQUID
Fraction: SV
Lab Smp Id: 9612E76-07AMS
Level: LOW
Operator: LH
Data Type: MS DATA
SampleType: BLANK
SpikeList File: tclp.spk
Quant Type: ISTD
Method File: /chem/h.i/h970108.b/h8270wQ.m
Misc Info: E003F3/H008S06/H008CC1

SPIKE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
17 ortho-Cresol	750	500	66.49	10-120
20 meta,para-Cresol	1500	870	58.32	10-120
12 1,4-Dichlorobenzen	500	380	75.29	20-124
53 2,4-Dinitrotoluene	500	400	79.65	39-139
63 Hexachlorobenzene	500	230	45.89	0-152
35 Hexachlorobutadien	500	500	100.30	24-116
22 Hexachloroethane	500	330	65.37	40-113
24 Nitrobenzene	500	300	59.34	35-180
64 Pentachlorophenol	750	740	98.46	14-176
2 Pyridine	500	180	36.79	0-150
40 2,4,5-Trichlorophe	750	610	81.10	30-140
39 2,4,6-Trichlorophe	750	480	63.96	37-144

SURROGATE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
$ 23 Nitrobenzene-d5	50	29	58.98	35-114
$ 41 2-Fluorobiphenyl	50	23	46.22	43-116
$ 72 Terphenyl-d14	50	40	80.23	33-141
$ 4 Phenol-d5	75	50	66.21	10-110
$ 3 2-Fluorophenol	75	53	70.78	21-110
$ 61 2,4,6-Tribromophen	75	65	86.15	10-123

SPL Houston Labs

RECOVERY REPORT

Client Name: Client SDG: h970106
Sample Matrix: LIQUID Fraction: SV
Lab Smp Id: LCS
Level: LOW Operator: LH
Data Type: MS DATA SampleType: MS
SpikeList File: tclp.spk Quant Type: ISTD
Method File: /chem/h.i/h970106.b/h8270wQ.m
Misc Info: E003F3/H003B03/H006CC2

SPIKE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
17 ortho-Cresol	75	54	71.66	10-120
20 meta,para-Cresol	150	100	67.45	10-120
12 1,4-Dichlorobenzen	50	39	77.80	20-124
53 2,4-Dinitrotoluene	50	49	97.49	39-139
63 Hexachlorobenzene	50	19	38.44	0-152
35 Hexachlorobutadien	50	53	105.53	24-116
22 Hexachloroethane	50	36	72.52	40-113
24 Nitrobenzene	50	34	68.08	35-180
64 Pentachlorophenol	75	68	90.24	14-176
2 Pyridine	50	28	57.10	0-150
40 2,4,5-Trichlorophe	75	60	79.42	30-140
39 2,4,6-Trichlorophe	75	56	75.02	37-144

SURROGATE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
$ 23 Nitrobenzene-d5	50	34	68.20	35-114
$ 41 2-Fluorobiphenyl	50	32	64.68	43-116
$ 72 Terphenyl-d14	50	47	94.05	33-141
$ 4 Phenol-d5	75	54	72.27	10-110
$ 3 2-Fluorophenol	75	51	68.58	21-110
$ 61 2,4,6-Tribromophen	75	66	88.77	10-123

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

SPL Blank QC Report

Matrix: Aqueous
Sample ID: BLANK
Batch: E970131042249

Reported on: 02/07/97 14:21
Analyzed on: 02/01/97 16:37
Analyst: PC

METHOD 8270 BLANK J031B03

Compound	Result	Detection Limit	Units
Pyridine	ND	5	ug/L
ortho-Cresol	ND	5	ug/L
meta,para-Cresol	ND	10	ug/L
Hexachloroethane	ND	5	ug/L
Nitrobenzene	ND	5	ug/L
Hexachlorobutadiene	ND	5	ug/L
2,4,6-Trichlorophenol	ND	5	ug/L
2,4,5-Trichlorophenol	ND	10	ug/L
2,4-Dinitrotoluene	ND	5	ug/L
Hexachlorobenzene	ND	5	ug/L
Pentachlorophenol	ND	25	ug/L
1,4-Dichlorobenzene	ND	5	ug/L

Surrogate	Result	QC Criteria	Units
2-Fluorobiphenyl	91	43-116	% Recovery
2-Fluorophenol	64	21-110	% Recovery
Nitrobenzene-d5	88	35-114	% Recovery
Phenol-d5	43	10-110	% Recovery
Terphenyl-d14	74	33-141	% Recovery
2,4,6-Tribromophenol	83	10-123	% Recovery

Samples in Batch 9701B55-01

Notes

ND - Not detected.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

SPL Blank QC Report

Matrix: Leachate
Sample ID: BLANK
Batch: E970131042249

Reported on: 02/07/97 14:2
Analyzed on: 02/01/97 17:4
Analyst: PC

METHOD 8270

Compound	Result	Detection Limit	Units
Pyridine	ND	5	ug/L
ortho-Cresol	ND	5	ug/L
meta,para-Cresol	ND	10	ug/L
Hexachloroethane	ND	5	ug/L
Nitrobenzene	ND	5	ug/L
Hexachlorobutadiene	ND	5	ug/L
2,4,6-Trichlorophenol	ND	5	ug/L
2,4,5-Trichlorophenol	ND	10	ug/L
2,4-Dinitrotoluene	ND	5	ug/L
Hexachlorobenzene	ND	5	ug/L
Pentachlorophenol	ND	25	ug/L
1,4-Dichlorobenzene	ND	5	ug/L

Surrogate	Result	QC Criteria	Units
2-Fluorobiphenyl	84	43-116	% Recovery
2-Fluorophenol	56	21-110	% Recovery
Nitrobenzene-d5	84	35-114	% Recovery
Phenol-d5	37	10-110	% Recovery
Terphenyl-d14	72	33-141	% Recovery
2,4,6-Tribromophenol	81	10-123	% Recovery

Samples in Batch 9701B55-01

Notes

ND - Not detected.

ICP Spectroscopy Method 6010 Quality Control Report

Matrix: TCLP Leachate - SOIL
EX1 01/30

Units: mg/L

Analyst: JM

Date:020497 Time:1203 File Name: 020497M2

Checked

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

R 2/6/97

Laboratory Control Sample

Element	Mth. Blank	True Value	Result	% Recovery	Lower Limit	Upper Limit
Silver	ND	2.00	1.984	99	1.60	2.40
Arsenic	ND	4.00	3.902	98	3.20	4.80
Barium	ND	2.00	2.057	103	1.60	2.40
Beryllium						
Cadmium	ND	2.00	1.814	91	1.60	2.40
Cobalt						
Chromium	ND	2.00	1.918	96	1.60	2.40
Copper						
Thallium						
Nickel						
Lead	ND	2.00	1.848	92	1.60	2.40
Antimony						
Selenium	ND	4.00	3.936	98	3.20	4.80
Vanadium						
Zinc						

Work Orders in Batch

Work Order	Fractions
97-01-B57	01A-03A
97-01-B55	01A

Matrix Spike - Spike Duplicate Results — Work Order Spiked: 97-01-B57 01A

Element	Sample Result	Spike Added	Matrix Spike Result	Matrix Spike Recovery		Matrix Spike Duplicate Result	Matrix Spike Duplicate Recovery		QC Limits % Recovery		Spike RPD %	QC Limits %
Silver	ND	1.0	0.060	6	*	0.072	7	*	80	120	19.4	20.0
Arsenic	ND	2.0	1.735	87		1.797	90		80	120	3.5	20.0
Barium	0.3855	1.0	1.203	82		1.266	88		80	120	7.4	20.0
Beryllium												
Cadmium	ND	1.0	0.817	82		0.847	85		80	120	3.6	20.0
Cobalt												
Chromium	ND	1.0	0.807	81		0.828	83		80	120	2.5	20.0
Copper												
Thallium												
Nickel												
Lead	ND	1.0	0.831	83		0.856	86		80	120	2.9	20.0
Antimony												
Selenium	ND	2.0	1.728	86		1.789	89		80	120	3.5	20.0
Vanadium												
Zinc												

DIG 25/50

* Spike Results Outside Method Limits

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

** SPL QUALITY CONTROL REPORT **

Matrix: Leachate

Reported on: 02/11/97
Analyzed on: 02/10/97
Analyst: PC

This sample was randomly selected for use in the SPL quality control program. Samples chosen are fortified with a known concentration in duplicate. The results are as follows:

Mercury, TCLP Leachate
METHOD 7470 ***

SPL Sample ID Number	Blank Value mg/L	LCS Concentration mg/L	Measured Concentration mg/L	% Recovery	QC Limits Recovery
LCS	ND	2.00	1.79	89.5	80 - 120

-9702264

Samples in batch:

9701B55-01A

COMMENTS:
LCS = SPL ID# 94-452-30-08

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

** SPL QUALITY CONTROL REPORT **

Matrix: Soil

Reported on: 02/05/97
Analyzed on: 02/05/97
Analyst: IP

This sample was randomly selected for use in the SPL quality control program. The results are as follows:

Cyanide-Reactive
METHOD 7.3.3.1 ***

-- *DUPLICATE ANALYSIS* --

SPL Sample ID	Original Sample Concentration mg/Kg	Duplicate Sample mg/Kg	RPD	RPD Max.
9701B55-01A	ND	ND	0	20

-9702119

Samples in batch:

9701B02-01A 9701B02-02A 9701B55-01A 9702052-01A

COMMENTS:

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

** SPL QUALITY CONTROL REPORT **

Matrix: Leachate

Reported on: 02/11/97
Analyzed on: 02/10/97
Analyst: PC

This sample was randomly selected for use in the SPL quality control program. Samples chosen are fortified with a known concentration in duplicate. The results are as follows:

Mercury, TCLP Leachate
METHOD 7470 ***

SPL Sample ID Number	Method Blank mg/L	Sample Result mg/L	Spike Added mg/L	Matrix Spike Result mg/L	Matrix Spike Recovery %	Matrix Spike Duplicate Result mg/L	Matrix Spike Duplicate Recovery %	RPD (%)	QC LIMITS (Advisory) RPD Max	QC LIMITS (Advisory) % REC
9701B55-01A	ND	ND	2.00	1.78	89.0	1.87	93.5	4.9	20	82.3 -125

-9702264

Samples in batch:

9701B55-01A

COMMENTS:
LCS = SPL ID# 94-452-30-08

QA/QC FORM
FLASH POINT by Cleveland Open Cup

DATE:	2-4-97		
METHOD:	ASTM D 92-85	# OF SAMPLES:	7
UNITS:	DEG. F	ANALYST:	T Benz

SAMPLE I.D.'s IN SET:

9702048-01A, 9702050-01A, 9702051-01A
9702052-01A, 9701B55-01A, 9701B93-01A
9701B93-02A

REPLICATES

SAMPLE I.D.	RESULT (#1)	DUPLICATE (#2)	DIFFERENCE | #1-#2 |	QC LIMITS
insufficient sample for duplicate analysis				

REVIEWED BY:	Bob Lenard	DATE:	2-4-97
APPROVED BY:		DATE:	

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

** SPL QUALITY CONTROL REPORT **

Matrix: Soil

Reported on: 01/30/97
Analyzed on: 01/30/97
Analyst: LAR

This sample was randomly selected for use in the SPL quality control program. The results are as follows:

Soil pH Measured in Water
METHOD 9045C ***

-- DUPLICATE ANALYSIS --

SPL Sample ID	Original Sample Concentration pH units	Duplicate Sample pH units	RPD	RPD Max.
9701B90-01A	9.96	9.95	0.1	1.1

-9701962

Samples in batch:

9701B55-01A 9701B90-01A 9701B93-01A 9701B93-02A

COMMENTS:

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

** SPL QUALITY CONTROL REPORT **

Matrix: Soil

Reported on: 02/05/97
Analyzed on: 02/05/97
Analyst: IP

This sample was randomly selected for use in the SPL quality control program. The results are as follows:

Sulfide-Reactive
METHOD 7.3.4.2 ***

-- DUPLICATE ANALYSIS --

SPL Sample ID	Original Sample Concentration mg/Kg	Duplicate Sample mg/Kg	RPD	RPD Max.
9701B55-01A	ND	ND	0	15

-9702120

Samples in batch:

9701B02-01A 9701B02-02A 9701B55-01A 9702052-01A

COMMENTS:

CHAIN OF CUSTODY

AND

SAMPLE RECEIPT CHECKLIST

7-01-BSS

Page 1 of 1

Environmental Laboratory
8880 Interchange Drive
Houston, Texas 77054
713/660-0901

Analysis Request and Chain of Custody Record

BS

Project No.	Client/Project Name	Project Location
B01501	R+B Environmental P.O. Box 1022 Hobbs, New Mexico 88240	BJ Services 2708 N. West County Road Hobbs, New Mexico 88241

Field Sample No./ Identification	Date and Time	Grab	Comp	Sample Container (Size/Mat'l)	Sample Type (Liquid, Sludge, Etc.)	Preservative	ANALYSIS REQUESTED	LABORATORY REMARKS
SC-1	1-24-97 14:25		V	2 8oz	Sludge	ICE	TCLP VOC - 8240 TCLP metals TCLP SVOC - 8270 RCI	

Samplers: (Signature)	Relinquished by: (Signature)	Date: 1-28-97 Time: 17:30	Received by: (Signature)	Date: 1-29-97 Time: 0945	Intact
F. Wesley Root	F. Wesley Root				
R+B Environmental Affiliation	Relinquished by: (Signature)	Date: Time:	Received by: (Signature)	Date: Time:	Intact
	Relinquished by: (Signature)	Date: Time:	Received by: (Signature)	Date: Time:	Intact

SAMPLER REMARKS: NORMAL 14 day TURN-A-ROUND
Home Phone 505-392-8844

Seal #

Received for laboratory: (Signature) — Date: / Time: — Laboratory No.

Data Results to:

SPL Houston Environmental Laboratory

Sample Login Checklist

Date:	Time:
1-29-97	0945

SPL Sample ID:
97-01-855

			Yes	No
1	Chain-of-Custody (COC) form is present.		✓	
2	COC is properly completed.		✓	
3	If no, Non-Conformance Worksheet has been completed.			
4	Custody seals are present on the shipping container.		✓	
5	If yes, custody seals are intact.		✓	
6	All samples are tagged or labeled.		✓	
7	If no, Non-Conformance Worksheet has been completed.			
8	Sample containers arrived intact		✓	
9	Temperature of samples upon arrival:		4° C	
10	Method of sample delivery to SPL:	SPL Delivery		
		Client Delivery		
		FedEx Delivery (airbill #)	9699799001	
		Other:		
11	Method of sample disposal:	SPL Disposal	✓	
		HOLD		
		Return to Client		

Name:	Date:
[signature]	1-29-97

R & B Environmental

P. O. Box 1022
Hobbs, New Mexico 88240
(505) 392-8844

February 17, 1997

Mr. Dan Miller
B J Services
2708 North West County Road
Hobbs, New Mexico 88240

RE: Waste Characterization
Wash Bay Waste Storage Facility
2708 North West County Road
Hobbs, New Mexico

R & B Project No. B01501

Mr. Miller:

R & B Environmental has completed waste characterization operations at the above listed site as requested by B J Services. The purpose of the sampling event was to characterize the subject waste for waste classification in accordance with RCRA Subtitle C regulations. The scope of work included collecting a composite sample of the subject waste, submitting the sample for laboratory analysis, and documenting the sampling event.

The subject waste consisted of semi-solid sediments contained in underground storage tanks at the waste storage facility located near the northern boundary of B J Services equipment yard. It is our understanding the purpose of the facility is to store waste generated during equipment cleaning operations, typically wash/rinse water, soap, dirt, and any residues that accumulated on the equipment during service in the oilfield.

R & B personnel inspected the facility and sampled the subject waste on January 24, 1997. The facility contained three fiberglass tanks and one sump. Four-point composite samples were obtained from each storage vessel and volumetrically combined to form one composite sample (SC-1).

Prior to collecting samples, the sampling equipment was decontaminated using Liquinox detergent and a distilled water rinse. A soapy water solution and water rinse were used to clean sampling equipment between samples.

SC-1 was placed into glass jars with teflon-lined lids and zero head space, labeled, sealed with QA/QC seals , and preserved on ice in accordance with EPA protocol for laboratory shipment.

The sample was shipped to SPL Laboratory in Houston for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), RCRA metals, and solid waste characteristics (ignitability, corrositivity, reactivity, and toxicity) analysis.

The laboratory analytical results recorded concentrations well below EPA Regulatory Limits and classify the waste as characteristically non-hazardous. A summary of the analytical results are presented in the enclosed tables. Facsimile copies of the laboratory results are attached. We expect to receive the actual laboratory report this week and will forward copies, including chains-of-custody, to you upon receipt.

R & B Environmental appreciates this opportunity to provide you with our professional services. If you have any questions concerning this project, or if we may be of further service, please do not hesitate to contact us.

Respectfully,
R & B Environmental
B01501.SAM

F. Wesley Root

F. Wesley Root
Geologist / Hydrologist

Enclosures

TABLE 1
SUMMARY OF SAMPLE ANALYTICAL RESULTS
TCLP VOLATILE ORGANIC COMPOUNDS (VOCs)
B J Services Wash Bay Storage Facility
R & B Project No. B01501

Volatile Organic Compound Name	Sample ID SC-1 01/24/97	Practical Quantitation Limit (ug/L)	Regulatory Limit (ug/L)
Benzene	190	50	500
2-Butanone	ND	200	200,000
Carbon Tetrachloride	ND	50	500
Chlorobenzene	ND	50	100,000
Chloroform	ND	50	6,000
1,2-Dichloroethane	ND	50	500
1,1-Dichloroethene	ND	50	700
Tetrachloroethene	ND	50	700
Trichloroethene	ND	50	500
Vinyl Chloride	ND	100	200

Analyses were performed using EPA Method 1311 / 8240 by SPL Laboratories.

All results are reported in micrograms per liter; ug/L (parts per billion; ppb). Results liisted in bold type exceed EPA Limits.

ND = Non Detect (concentration less than PQL)

TABLE 2
SUMMARY OF SAMPLE ANALYTICAL RESULTS
TCLP SEMIVOLATILE ORGANIC COMPOUNDS (SVOCs)
B J Services Wash Bay Storage Facility
R & B Project No. B01501

Volatile Organic Compound Name	Sample ID SC-1 01/24/97	Practical Quantitation Limit (ug/L)	Regulatory Limit (ug/L)
ortho-Cresol	ND	50	200,000
meta, para-Cresols	ND	100	200,000
1,4-Dichlorobenzene	ND	50	7,500
2,4-Dinitrotoluene	ND	50	130
Hexachlorobenzene	ND	50	130
Hexachlorobutadiene	ND	50	500
Hexachloroethane	ND	50	3,000
Nitrobenzene	ND	50	2,000
Pentachlorophenol	ND	250	100,000
Pyridine	ND	50	5,000
2, 4, 5-Trichlorophenol	ND	100	400,000
2, 4, 6-Trichlorophenol	ND	50	2,000

Analyses were performed using EPA Method 1311 / 8270 by SPL Laboratories.

All results are reported in micrograms per liter; ug/L (parts per billion; ppb). Results liisted in bold type exceed EPA Limits.

ND = Non Detect (concentration less than PQL)

TABLE 3
SUMMARY OF SAMPLE ANALYTICAL RESULTS
RCI & TCLP METALS
B J Services Wash Bay Storage Facility
R & B Project No. B01501

Tested Parameter Name	Units	Sample ID SC-1 01/24/97	Detection Limit	Regulatory Limit
Reactivity (Cyanide)	mg/Kg	ND	10	250
Reactivity (Sulfide)	mg/Kg	ND	100	500
Soil pH	pH units	5.64	N/A	2 to 12.5
Flash & Fire Point	degrees F	>210	N/A	>140
Arsenic (As)	mg/L	ND	0.20	5.00
Selenium (Se)	mg/L	ND	0.20	1.00
Cadmium (Cd)	mg/L	ND	0.01	1.00
Chromium (Cr)	mg/L	ND	0.02	5.00
Lead (Pb)	mg/L	ND	0.10	5.00
Silver (Ag)	mg/L	ND	0.01	5.00
Barium (Ba)	mg/L	ND	1.00	100.00
Mercury (Hg)	mg/L	ND	0.0004	0.20

Analyses were performed by SPL Laboratories.

using EPA Methods: 1311 / 6010A, 7470, SW846/7.3.4.2, 7.3.3.2, 9045C, ASTM D92-85 .

Results liisted in bold type exceed EPA Limits. ND = Non Detect (concentration less than detection limit)

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

DATE: 02/14/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: SLUDGE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	DETECTION LIMIT	UNITS
Silver, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.01	mg/L
Arsenic, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.2	mg/L
Barium, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	1	mg/L
Cadmium, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.01	mg/L
Chromium, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.02	mg/L
Cyanide-Reactive Method 7.3.3.2 *** Analyzed by: IP Date: 02/05/97	ND	10	mg/Kg

ND - Not detected.

Notes: *Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA
**Ref: Standard Methods for Examination of Water & Wastewater, 18th ed.
***Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

DATE: 02/14/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: SLUDGE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	DETECTION LIMIT	UNITS
Flash and Fire Point- C.O.C. Method ASTM D92-85 Analyzed by: TB Date: 02/04/97	>210		°F
Mercury, TCLP Leachate Method 7470 A*** Analyzed by: PC Date: 02/10/97	ND	0.0004	mg/L
Acid Digestion of TCLP Leachate, ICP Method 3010A *** Analyzed by: MM Date: 01/31/97	01/31/97		
Lead, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.1	mg/L
Soil pH Measured in Water Method 9045C *** Analyzed by: LAR Date: 01/30/97	5.64		pH units
TCLP Leachate Extraction Method 1311 *** Analyzed by: WLR Date: 01/30/97	01/30/97		

ND - Not detected.

Notes: *Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA
**Ref: Standard Methods for Examination of Water & Wastewater, 18th ed.
***Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

DATE: 02/14/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: SLUDGE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	DETECTION LIMIT	UNITS
TCLP Leachate Extraction Method 1311 *** Analyzed by: WLR Date: 01/30/97	01/30/97		
Zero Headspace extraction Method 1311 Analyzed by: WLR Date: 01/30/97	01/30/97		
Selenium, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.2	mg/L
Sulfide-Reactive Method 7.3.4.2 *** Analyzed by: IP Date: 02/05/97	ND	100	mg/Kg

ND - Not detected.

Notes: *Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA
**Ref: Standard Methods for Examination of Water & Wastewater, 18th ed.
***Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

02/14/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: LEACHATE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS	RL ▲
ortho-Cresol	ND	50	ug/L	200000
meta, para-Cresols	ND	100	ug/L	200000
1,4-Dichlorobenzene	ND	50	ug/L	7500
2,4-Dinitrotoluene	ND	50	ug/L	130
Hexachlorobenzene	ND	50	ug/L	130
Hexachlorobutadiene	ND	50	ug/L	500
Hexachloroethane	ND	50	ug/L	3000
Nitrobenzene	ND	50	ug/L	2000
Pentachlorophenol	ND	250	ug/L	100000
Pyridine	ND	50	ug/L	5000
2,4,5-Trichlorophenol	ND	100	ug/L	400000
2,4,6-Trichlorophenol	ND	50	ug/L	2000

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
Nitrobenzene-d5	50 ug/L	106	35	114
2-Fluorobiphenyl	50 ug/L	94	43	116
Terphenyl-d14	50 ug/L	83	33	141
Phenol-d5	75 ug/L	102	10	110
2-Fluorophenol	75 ug/L	88	21	110
2,4,6-Tribromophenol	75 ug/L	85	10	123

ANALYZED BY: EC DATE/TIME: 02/04/97 17:45:00
LEACHATE EXTRACTION BY: SW DATE/TIME: 01/31/97 13:00:00
METHOD: 1311/8270, TCLP Semivolatiles
NOTES: * - Practical Quantitation Limit ND - Not Detected
NA - Not Analyzed
▲ - Regulatory Limit. Reference Federal Register 55, 11862 (03/29/90), RCRA Toxicity Characteristic Final Rule.

COMMENTS:

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

02/14/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: LEACHATE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS	RL ▲
Benzene	190	50	ug/L	500
2-Butanone	ND	200	ug/L	200000
Carbon Tetrachloride	ND	50	ug/L	500
Chlorobenzene	ND	50	ug/L	100000
Chloroform	ND	50	ug/L	6000
1,2-Dichloroethane	ND	50	ug/L	500
1,1-Dichloroethene	ND	50	ug/L	700
Tetrachloroethene	ND	50	ug/L	700
Trichloroethene	ND	50	ug/L	500
Vinyl Chloride	ND	100	ug/L	200

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
4-Bromofluorobenzene	50 ug/L	100	86	115
1,2-Dichloroethane-d4	50 ug/L	96	76	114
Toluene-d8	50 ug/L	105	88	110

ANALYZED BY: GT DATE/TIME: 01/31/97 14:46:00
LEACHATE PREP(ZHE) BY: WLR DATE/TIME: 01/30/97
METHOD: 1311/8240, TCLP Volatiles
NOTES: * - Practical Quantitation Limit ND - Not Detected
NA - Not Analyzed
▲ - Regulatory Limit. Reference Federal Register 55, 11862 (3/29/90), RCRA Toxicity Characteristic Final Rule.

COMMENTS:

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

January 24, 1997

Mr. Ken Marsh
Controlled Recovery, Inc. (CRI)
P.O. Box 369
Hobbs, NM 88241

RE: Wastewater Solids /Slurry Disposal at BJ Services Company, U.S.A. Hobbs Facility

Dear Mr. Marsh:

The purpose of this letter is to request sampling and disposal of wastewater solids located at the BJ Services facility in Hobbs, New Mexico. The facility is physically located at 2708 West County Road in Hobbs. The wastewater solids are located in four tanks (capacities: one 800 gallon and three 12,000 gallon) along the fenceline at the facility. As of the time of this letter, the quantity of wastewater solids is unknown. The wastewater originated from the washrack facility on the BJ Services site as a result of pressure washing activities by BJ.

Therefore, I am requesting the following services from CRI:

- sample the wastewater solids contained in the tanks (a composite of all four tanks would be sufficient);
- have the wastewater solids sample analyzed for the constituents required for disposal by the New Mexico Oil Conservation Division (NMOCD) (Full TCLP and RCI);
- seek approval for disposal of the wastewater solids from NMOCD;
- transport the wastewater solids to your NMOCD approved disposal site;
- dispose of the wastewater solids.

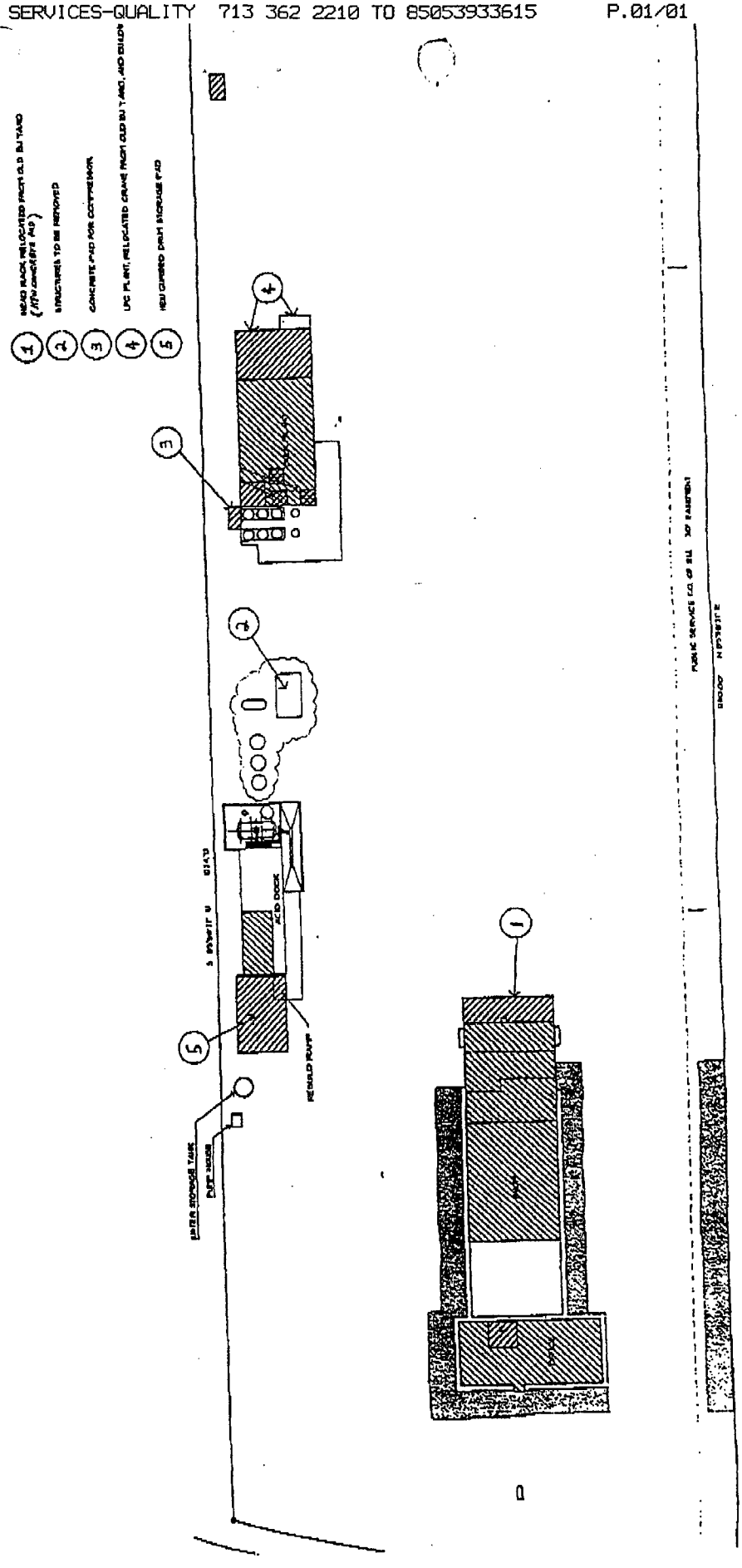
If you have any questions regarding this request, please call me at (281) 363-7521.

Sincerely,

Rick N. Johnson
Environmental Specialist

Post-it® Fax Note 7671	Date 1-24	# of pages ▶ 1
To Billie / Art / Ken	From Rick Johnson	
Co./Dept. CRI	Co. BJ	
Phone #	Phone # 281-363-7521	
Fax # 505-393-3615	Fax #	

To: Ken Marsh -CRI
From: Rick N. Johnson -BJS
Here is the site plan for Hobbs, #2 is the tank area.



** TOTAL PAGE.01 **

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
FEB 20 1998
Environmental Bureau
Oil Conservation Division

Form C-1
Originated 8/1

Submit Orig
Plus 1 C
to appropr
District Of

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ BY W Price 2/12/98 Verbal Approval Received: Yes ☒ No ☐	4. Generator Baker Oil Tools
	5. Originating Site Hobbs facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Rowland Trucking
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 507 West County Road Hobbs	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Baker Oil Tools Hobbs facility. The waste was genreated by steaming tool. This waste has been approved in the paste. I have included a certificate of waste and a chain of custody.

Please Notify Baker Oil Tools
Last Approval For Sample Period
2-12-97
02-014

Must Resample & Analyze Waste Stream
MJK

FEB 1998
Received
Hobbs
OCD

Mailed to Hobbs 2/23/98

Estimated Volume 60 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Office Manager DATE: 02/12/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR BNSR DATE: 2/16/98

APPROVED BY: Martyne J Kelly TITLE: Env Geologist DATE: 2/20/98

FEB 1998
Received
Hobbs
OCD

BAKER OIL TOOLS

FAX TRANSMITTAL MEMO

HOBBS, NEW MEXICO

Telephone: 505-397-3671 • Fax: 505-393-4213

Date:	2-27-98		
To:	Billie Charo	**From:**	Ray Dockery
Location:		**Ref:**	
Company:	CRI	**Subject:**	Sump disposal
Fax No.:	393-3615	**# pgs:(inc. this pg)**	2
Copy:			

The waste we are sending remains the same as previously tested.

Ray Dockery

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR Baker Oil Tools

ADDRESS P O Box 1828 Hobbs, NM 88240

GENERATING SITE 507 West County Road Hobbs

COUNTY Lea **STATE** NM

TYPE OF WASTE Sump water

ESTIMATED VOLUME 60 bbls

GENERATING PROCESS steaming tools

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY Rowland Trucking

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT Ray Dockery
SIGNATURE

NAME Ray Dockery
PRINTED

ADDRESS P O Box 1828

Hobbs, NM 88240

DATE 2-27-98

FEB 1998 Received Hobbs OCD

EPIC LABORATORIES, INC.

ANALYTICAL AND QUALITY CONTROL REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

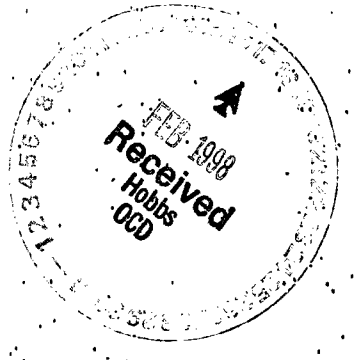
EPIC Job Number: 97.00485

Page 1

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Enclosed are the Analytical Results and Quality Control Data Reports for the following samples submitted to EPIC Laboratories, Inc. for analysis:

Sample Number	Sample Description	Date Taken	Time Taken	Date Received
328563	#1 Sample (Main)	02/12/1997	07:30	02/14/1997
328565	Sample #2 (Main)	02/12/1997	07:30	02/14/1997



This Quality Control report is generated on a batch basis: All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

Cathy Cuney for
Jim Rowley
Project Manager

NOTE: Results apply only to the samples analyzed. Reproduction of this report is permitted only in its entirety.

ANALYTICAL RESULTS REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485
Sample Number: 328563

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Sample Description: #1 Sample (Main)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
Cyanide, Reactive		<0.25	mg/kg	S-7.3.3.1		02/24/1997	kwo		496	0.25
pH, Corrosivity		7.39	units	S-7.2.2		02/20/1997	egl		1400	N/A
Sulfide, Reactive		30	mg/kg	S-7.3.4.1		02/24/1997	kwo		519	12.5
TCLP-Arsenic, ICP		<0.03	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1516	0.03
TCLP-Barium, ICP		0.22	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1403	0.01
TCLP-Cadmium, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1578	0.01
TCLP-Chromium, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1577	0.01
TCLP-Lead, ICP		0.12	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1586	0.05
TCLP-Mercury, CVAA	EDL	<0.02	mg/L	S-7470A		02/19/1997	bwb		1334	0.0002
TCLP-Selenium, ICP		<0.04	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1515	0.04
TCLP-Silver, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1566	0.01
Ignitability	DNB	>200		ASTM D4982-89		02/21/1997	bas		311	
TCLP-ACID EXTRACTABLES - 8270					02/20/1997					
TCLP-Cresols, Total		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Pentachlorophenol		<0.33	mg/L	S-8270A		02/24/1997	dtw	434	419	0.33
TCLP-2,4,5-Trichlorophenol		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-2,4,6-Trichlorophenol		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
SURR: 2-Fluorophenol		26	% Rec	S-8270A		02/24/1997	dtw	434	419	21-100
SURR: Phenol-d5		20	% Rec	S-8270A		02/24/1997	dtw	434	419	10-94
SURR: 2,4,6-Tribromophenol		68	% Rec	S-8270A		02/24/1997	dtw	434	419	10-123
TCLP-BASE NEUTRALS - 8270					02/20/1997					
TCLP-1,4-Dichlorobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-2,4-Dinitrotoluene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Hexachlorobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Hexachlorobutadiene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Hexachloroethane		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Nitrobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Pyridine		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
SURR: 2-Fluorobiphenyl		99	% Rec	S-8270A		02/24/1997	dtw	434	419	43-116
SURR: Nitrobenzene-d5		64	% Rec	S-8270A		02/24/1997	dtw	434	419	35-114
SURR: Terphenyl-d14		98	% Rec	S-8270A		02/24/1997	dtw	434	419	33-141

DNB - Does not burn.
EDL - Elevated Detection Limit due to matrix interference.

ANALYTICAL RESULTS REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485
Sample Number: 328563

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Sample Description: #1 Sample (Main)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
TCLP-8240										
TCLP-Benzene		0.055	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-2-Butanone (MEK)		<0.50	mg/L	S-8240A		02/27/1997	acg		1173	0.50
TCLP-Carbon Tetrachloride		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Chlorobenzene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Chloroform		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-1,2-Dichloroethane		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-1,1-Dichloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Tetrachloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Trichloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Vinyl chloride		<0.05	mg/L	S-8240A		02/27/1997	acg		1173	0.05
SURR: 1,2-Dichloroethane-d4		107	% Rec	S-8240A		02/27/1997	acg		1173	76-114
SURR: Toluene-d8		109	% Rec	S-8240A		02/27/1997	acg		1173	88-110
SURR: 4-Bromofluorobenzene		105	% Rec	S-8240A		02/27/1997	acg		1173	86-115

ANALYTICAL RESULTS REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485
Sample Number: 328565

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Sample Description: Sample #2 (Main)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
Cyanide, Reactive		<0.25	mg/kg	S-7.3.3.1		02/24/1997	kwo		496	0.25
pH, Corrosivity		7.61	units	S-7.2.2		02/20/1997	cgl		1400	N/A
Sulfide, Reactive		<12.5	mg/kg	S-7.3.4.1		02/24/1997	kwo		519	12.5
TCLP-Arsenic, ICP		<0.03	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1516	0.03
TCLP-Barium, ICP		0.20	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1403	0.01
TCLP-Cadmium, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1578	0.01
TCLP-Chromium, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1677	0.01
TCLP-Lead, ICP		0.1	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1586	0.03
TCLP-Mercury, CVAA	EDL	<0.02	mg/L	S-7470A		02/19/1997	bwh		1534	0.0002
TCLP-Selenium, ICP		<0.04	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1515	0.04
TCLP-Silver, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1568	0.01
Ignitability	DNB	>200		ASTM D-982-89		02/21/1997	bsa		511	
TCLP-ACID EXTRACTABLES - 8270					02/20/1997					
TCLP-Cresols, Total		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Pentachlorophenol		<0.33	mg/L	S-8270A		02/24/1997	dtw	434	419	0.33
TCLP-2,4,5-Trichlorophenol		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-2,4,6-Trichlorophenol		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
SURR: 2-Fluorophenol		93	% Rec	S-8270A		02/24/1997	dtw	434	419	21-100
SURR: Phenol-d5		76	% Rec	S-8270A		02/24/1997	dtw	434	419	10-94
SURR: 2,4,6-Tribromophenol		119	% Rec	S-8270A		02/24/1997	dtw	434	419	10-123
TCLP-BASE NEUTRALS - 8270					02/20/1997					
TCLP-1,4-Dichlorobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-2,4-Dinitrotoluene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Hexachlorobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Hexachlorobutadiene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Hexachloroethane		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Nitrobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Pyridine		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
SURR: 2-Fluorobiphenyl		105	% Rec	S-8270A		02/24/1997	dtw	434	419	43-116
SURR: Nitrobenzene-d5		99	% Rec	S-8270A		02/24/1997	dtw	434	419	35-114
SURR: Terphenyl-d14		76	% Rec	S-8270A		02/24/1997	dtw	434	419	33-141

DNB - Does not burn.
EDL - Elevated Detection Limit due to matrix interference.

FEB 1998
Received
Hobbs
OCD

ANALYTICAL RESULTS REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

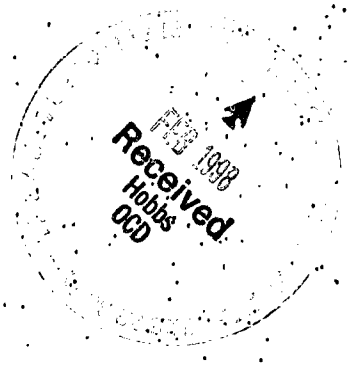
02/28/1997

EPIC Job Number: 97.00485
Sample Number: 328565

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Sample Description: Sample #2 (Main)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
TCLP-8240										
TCLP-Benzene		0.039	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-2-Butanone (MEK)		<0.50	mg/L	S-8240A		02/27/1997	acg		1173	0.50
TCLP-Carbon Tetrachloride		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Chlorobenzene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Chloroform		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-1,2-Dichloroethane		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-1,1-Dichloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Tetrachloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Trichloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Vinyl chloride		<0.05	mg/L	S-8240A		02/27/1997	acg		1173	0.05
SURR: 1,2-Dichloroethane-d4		106	% Rec	S-8240A		02/27/1997	acg		1173	76-114
SURR: Toluene-d8		109	% Rec	S-8240A		02/27/1997	acg		1173	88-110
SURR: 4-Bromofluorobenzene		105	% Rec	S-8240A		02/27/1997	acg		1173	86-115



QUALITY CONTROL REPORT
BLANKS

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

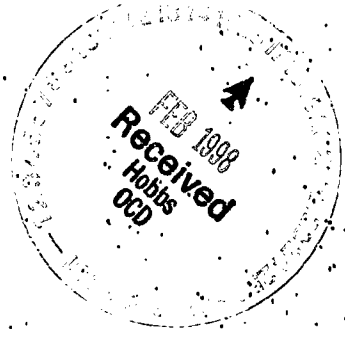
02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Blank Result	Units	Reporting Limit	Date Analyzed	Prep Batch Number	Run Batch Number
Cyanide, Reactive		<0.25	mg/kg	0.25	02/24/1997		496
Sulfide, Reactive		<12.5	mg/kg	12.5	02/24/1997		519
TCLP-Arsenic, ICP		<0.03	mg/L	0.03	02/19/1997	1200	1516
TCLP-Barium, ICP		<0.01	mg/L	0.01	02/19/1997	1200	1403
TCLP-Cadmium, ICP		<0.01	mg/L	0.01	02/19/1997	1200	1578
TCLP-Chromium, ICP		<0.01	mg/L	0.01	02/19/1997	1200	1577
TCLP-Lead, ICP		<0.03	mg/L	0.03	02/19/1997	1200	1586
TCLP-Mercury, CVAA		<0.0002	mg/L	0.0002	02/19/1997		1334
TCLP-Selenium, ICP		<0.04	mg/L	0.04	02/19/1997	1200	1515
TCLP-Silver, ICP		<0.01	mg/L	0.01	02/19/1997	1200	1668
TCLP-ACID EXTRACTABLES - 8270							
TCLP-Cresols, Total		<0.066	mg/L	0.066	02/24/1997	434	419
TCLP-Pentachlorophenol		<0.33	mg/L	0.33	02/24/1997	434	419
TCLP-2,4,5-Trichlorophenol		<0.066	mg/L	0.066	02/24/1997	434	419
TCLP-2,4,6-Trichlorophenol		<0.066	mg/L	0.066	02/24/1997	434	419
TCLP-BASE NEUTRALS - 8270							
TCLP-1,4-Dichlorobenzene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-2,4-Dinitrotoluene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Hexachlorobenzene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Hexachlorobutadiene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Hexachloroethane		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Nitrobenzene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Pyridine		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-8260							
TCLP-Benzene		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-2-Butanone (MEK)		<0.50	mg/L	0.50	02/27/1997		1173
TCLP-Carbon Tetrachloride		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-Chlorobenzene		<0.025	mg/L	0.025	02/27/1997		1173

All parameters should be less than the reporting limit.



QUALITY CONTROL REPORT
BLANKS

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Blank Result	Units	Reporting Limit	Date Analyzed	Prep Batch Number	Run Batch Number
TCLP-Chloroform		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-1,2-Dichloroethane		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-1,1-Dichloroethene		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-Tetrachloroethene		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-Trichloroethene		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-Vinyl chloride		<0.05	mg/L	0.05	02/27/1997		1173

All parameters should be less than the reporting limit.

QUALITY CONTROL REPORT
CONTINUING CALIBRATION VERIFICATION STANDARD

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	CCVS True Concentration	Units	CCVS Concentration Found	CCVS Percent Recovery	Date Analyzed	Run Batch Number
Cyanide, Reactive		1.0	mg/kg	1.0	100.0	02/24/1997	496
Sulfide, Reactive		1000	mg/kg	1000	100.0	02/24/1997	519
TCLP-Arsenic, ICP		1.00	mg/L	1.10	110.0	02/19/1997	1516
TCLP-Arsenic, ICP		1.00	mg/L	1.10	110.0	02/19/1997	1516
TCLP-Barium, ICP		1.00	mg/L	0.99	99.0	02/19/1997	1403
TCLP-Barium, ICP		1.00	mg/L	0.99	99.0	02/19/1997	1403
TCLP-Cadmium, ICP		1.00	mg/L	1.02	102.0	02/19/1997	1678
TCLP-Cadmium, ICP		1.00	mg/L	1.02	102.0	02/19/1997	1678
TCLP-Chromium, ICP		1.00	mg/L	1.01	101.0	02/19/1997	1677
TCLP-Chromium, ICP		1.00	mg/L	1.01	101.0	02/19/1997	1677
TCLP-Lead, ICP		1.00	mg/L	1.00	100.0	02/19/1997	1585
TCLP-Lead, ICP		1.00	mg/L	1.00	100.0	02/19/1997	1585
TCLP-Mercury, CVAA		0.50	mg/L	0.52	104.0	02/19/1997	1334
TCLP-Selenium, ICP		1.00	mg/L	1.04	104.0	02/19/1997	1515
TCLP-Selenium, ICP		1.00	mg/L	1.04	104.0	02/19/1997	1515
TCLP-Silver, ICP		1.00	mg/L	0.98	98.0	02/19/1997	1569
TCLP-Silver, ICP		1.00	mg/L	0.98	98.0	02/19/1997	1569
TCLP-ACID EXTRACTABLES - 8270							
TCLP-Cresols, Total		0.10	mg/L	0.079	79.0	02/24/1997	419
TCLP-Pentachlorophenol		0.050	mg/L	0.057	114.0	02/24/1997	419
TCLP-2,4,5-Trichlorophenol		0.050	mg/L	0.045	90.0	02/24/1997	419
TCLP-2,4,6-Trichlorophenol		0.050	mg/L	0.045	90.0	02/24/1997	419
TCLP-BASE NEUTRALS - 8270							
TCLP-1,4-Dichlorobenzene		0.050	mg/L	0.040	80.0	02/24/1997	418
TCLP-2,4-Dinitrotoluene		0.050	mg/L	0.044	88.0	02/24/1997	418
TCLP-Hexachlorobenzene		0.050	mg/L	0.055	110.0	02/24/1997	418
TCLP-Hexachlorobutadiene		0.050	mg/L	0.049	98.0	02/24/1997	418
TCLP-Hexachloroethane		0.050	mg/L	0.039	78.0	02/24/1997	418

CCVS - Continuing Calibration Verification Standard

QUALITY CONTROL REPORT
CONTINUING CALIBRATION VERIFICATION STANDARD

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	CCVS True Concentration	Units	CCVS Concentration Found	CCVS Percent Recovery	Date Analyzed	Run Batch Number
TCLP-Nitrobenzene		0.050	mg/L	0.040	80.0	02/24/1997	418
TCLP-Pyridine		0.050	mg/L	0.042	84.0	02/24/1997	418
TCLP-8240							
TCLP-Benzene		0.020	mg/L	0.023	115.0	02/27/1997	1173
TCLP-2-Butanone (MEK)		0.020	mg/L	0.023	115.0	02/27/1997	1173
TCLP-Carbon Tetrachloride		0.020	mg/L	0.019	95.0	02/27/1997	1173
TCLP-Chlorobenzene		0.020	mg/L	0.021	105.0	02/27/1997	1173
TCLP-Chloroform		0.020	mg/L	0.022	110.0	02/27/1997	1173
TCLP-1,2-Dichloroethane		0.020	mg/L	0.022	110.0	02/27/1997	1173
TCLP-1,1-Dichloroethene		0.020	mg/L	0.020	100.0	02/27/1997	1173
TCLP-Tetrachloroethene		0.020	mg/L	0.023	115.0	02/27/1997	1173
TCLP-Trichloroethene		0.020	mg/L	0.022	110.0	02/27/1997	1173
TCLP-Vinyl chloride		0.020	mg/L	0.018	90.0	02/27/1997	1173

CCVS - Continuing Calibration Verification Standard.

QUALITY CONTROL REPORT
MATRIX SPIKE/MATRIX SPIKE DUPLICATE

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

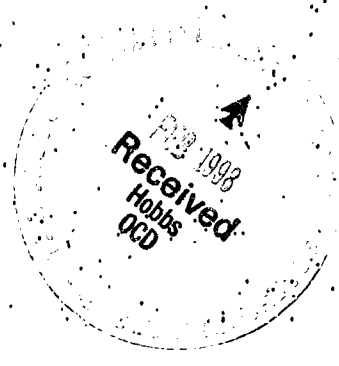
02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Units	Sample Result	Spike Amount Added	Matrix Spike Result	MS Percent Recovery	Duplicate Spike Amount Added	MSD Result	MSD Percent Recovery	MS/MSD RPD	Date Analyzed	Prep Batch Number	Run Batch Number
TCLP-Arsenic, ICP		mg/L	<0.03	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/28/1997		1516
TCLP-Arsenic, ICP		mg/L	<0.03	1.00	1.03	103.0	1.00	1.08	108.0	4.7	02/19/1997	1200	1516
TCLP-Barium, ICP		mg/L	<0.01	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1403
TCLP-Barium, ICP		mg/L	0.57	1.00	1.41	84.0	1.00	1.51	94.0	11.2	02/19/1997	1200	1403
TCLP-Cadmium, ICP		mg/L	<0.01	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1578
TCLP-Cadmium, ICP		mg/L	<0.01	1.00	0.92	92.0	1.00	0.98	98.0	6.3	02/19/1997	1200	1578
TCLP-Chromium, ICP		mg/L	<0.01	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1577
TCLP-Chromium, ICP		mg/L	0.04	1.00	0.95	91.0	1.00	1.03	99.0	8.4	02/19/1997	1200	1577
TCLP-Lead, ICP		mg/L	<0.03	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1586
TCLP-Lead, ICP		mg/L	0.42	1.00	1.30	88.0	1.00	1.38	96.0	8.7	02/19/1997	1200	1586
TCLP-Mercury, CVAA		mg/L	0.0002	0.50	0.50	100.0	0.50	0.50	100.0	0.0	02/19/1997		1334
TCLP-Selenium, ICP		mg/L	<0.04	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/18/1997		1515
TCLP-Selenium, ICP		mg/L	<0.04	1.00	1.05	105.0	1.00	1.14	114.0	8.2	02/19/1997	1200	1515
TCLP-Silver, ICP		mg/L	<0.01	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1668
TCLP-Silver, ICP		mg/L	<0.01	1.00	0.88	88.0	1.00	0.93	93.0	5.5	02/19/1997	1200	1568
TCLP-ACID EXTRACTABLES - 8270													
TCLP-Cresols, Total		mg/L	<0.066	0.30	0.109	36.3	0.30	0.111	37.0	1.9	02/24/1997	434	419
TCLP-Pentachlorophenol		mg/L	<0.22	0.10	0.043	43.0	0.10	0.049	49.0	13.0	02/24/1997	434	419
TCLP-2,4,5-Trichlorophenol		mg/L	<0.066	0.10	0.044	44.0	0.10	0.048	48.0	8.7	02/24/1997	434	419
TCLP-2,4,6-Trichlorophenol		mg/L	<0.066	0.10	0.046	46.0	0.10	0.041	41.0	15.7	02/24/1997	434	419
TCLP-BASE NEUTRALS - 8270													
TCLP-1,4-Dichlorobenzene		mg/L	<0.066	0.10	0.040	40.0	0.10	0.042	42.0	4.9	02/24/1997	434	418
TCLP-2,4-Dinitrotoluene		mg/L	<0.066	0.10	0.043	43.0	0.10	0.044	44.0	2.3	02/24/1997	434	418
TCLP-Hexachlorobenzene		mg/L	<0.066	0.10	0.044	44.0	0.10	0.050	50.0	12.8	02/24/1997	434	418
TCLP-Hexachlorobutadiene		mg/L	<0.066	0.10	0.046	46.0	0.10	0.048	48.0	6.5	02/24/1997	434	418

NOTE: The Quality Control data in this report reflects the batch in which your sample was prepped and/or analyzed. The sample selected for QA may not necessarily be your sample.



QUALITY CONTROL REPORT
MATRIX SPIKE/MATRIX SPIKE DUPLICATE

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Units	Sample Result	Spike Amount Added	Matrix Spike Result	MS Percent Recovery	Duplicate Spike Amount Added	MSD Result	MSD Percent Recovery	MS/MSD RPD	Date Analyzed	Prep Batch Number	Run Batch Number
TCLP-Hexachloroethane		mg/L	<0.066	0.10	0.048	48.0	0.10	0.045	45.0	2.1	02/24/1997	434	418
TCLP-Nitrobenzene		mg/L	<0.066	0.10	0.046	46.0	0.10	0.047	47.0	2.2	02/24/1997	434	418
TCLP-Pyridine		mg/L	<0.066	0.10	0.060	60.0	0.10	0.062	62.0	3.3	02/24/1997	434	418
TCLP-8240													
TCLP-Benzene		mg/L	<0.025	0.020	0.025	125.0	0.020	0.026	125.0	0.0	02/27/1997		1173
TCLP-2-Butanone (MEK)		mg/L	<0.50	0.020	0.019	95.0	0.020	0.018	90.0	5.4	02/27/1997		1173
TCLP-Carbon Tetrachloride		mg/L	<0.025	0.020	0.020	100.0	0.020	0.019	95.0	5.0	02/27/1997		1173
TCLP-Chlorobenzene		mg/L	<0.025	0.020	0.023	115.0	0.020	0.023	115.0	0.0	02/27/1997		1173
TCLP-Chloroform		mg/L	<0.025	0.020	0.024	120.0	0.020	0.023	115.0	4.3	02/27/1997		1173
TCLP-1,2-Dichloroethane		mg/L	<0.025	0.020	0.022	110.0	0.020	0.022	110.0	0.0	02/27/1997		1173
TCLP-1,1-Dichloroethene		mg/L	<0.025	0.020	0.021	105.0	0.020	0.021	105.0	0.0	02/27/1997		1173
TCLP-Tetrachloroethene		mg/L	<0.025	0.020	0.024	120.0	0.020	0.021	105.0	13.3	02/27/1997		1173
TCLP-Trichloroethene		mg/L	<0.025	0.020	0.022	110.0	0.020	0.022	110.0	0.0	02/27/1997		1173
TCLP-Vinyl chloride		mg/L	<0.05	0.020	0.017	85.0	0.020	0.015	75.0	12.5	02/27/1997		1173

NOTE: The Quality Control data in this report reflects the batch in which your sample was prepped and/or analyzed.
The sample selected for QA may not necessarily be your sample.

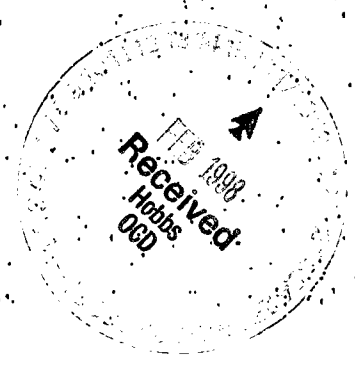
QUALITY CONTROL REPORT
DUPLICATES

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997
EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Units	Sample Result	Duplicate Sample Result	RPD	Date Analyzed	Prep Batch Number	Run Batch Number
pH, Corrosivity		units	7.24	7.31	0.4	02/20/1997		1400



QUALITY CONTROL REPORT
LABORATORY CONTROL STANDARD

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/26/1997

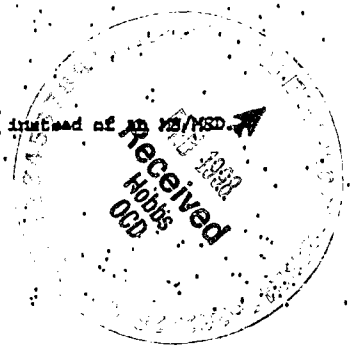
EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Analyte	Prep Batch No.	Run Batch No.	LCS True Conc	Units	LCS Conc Found	LCS % Rec.	LCS Dup Conc. Found	LCS Dup % Rec	LCS % RPD	Flag	Date Analyzed
Cyanide, Reactive		496	1000	mg/kg	379	37.9					02/24/1997
pH, Corrosivity		1400	9.18	units	8.94	97.4					02/20/1997
Sulfide, Reactive		519	1000	mg/kg	960	96.0					02/24/1997
TCLP-Arsenic, ICP	1200	1516	1.00	mg/L	1.05	105.0					02/18/1997
TCLP-Barium, ICP	1200	1403	1.00	mg/L	1.00	100.0					02/19/1997
TCLP-Cadmium, ICP	1200	1576	1.00	mg/L	0.99	99.0					02/19/1997
TCLP-Chromium, ICP	1200	1577	1.00	mg/L	0.99	99.0					02/19/1997
TCLP-Lead, ICP	1200	1586	1.00	mg/L	0.98	98.0					02/19/1997
TCLP-Mercury, CVAA		1324	0.50	mg/L	0.57	114.0					02/19/1997
TCLP-Selenium, ICP	1200	1515	1.00	mg/L	0.97	97.0					02/19/1997
TCLP-Silver, ICP	1200	1568	1.00	mg/L	0.91	91.0					02/19/1997
TCLP-ACID EXTRACTABLES - 8270											
TCLP-Cresols, Total	434	419	0.30	mg/L	0.137	45.7					02/24/1997
TCLP-Pentachlorophenol	434	419	0.15	mg/L	0.035	38.0					02/24/1997
TCLP-2,4,6-Trichlorophenol	434	419	0.10	mg/L	0.047	47.0					02/24/1997
TCLP-2,4,6-Trichlorophenol	434	419	0.10	mg/L	0.057	57.0					02/24/1997
TCLP-BASE NEUTRALS - 8270											
TCLP-1,4-Dichlorobenzene	434	418	0.10	mg/L	0.045	45.0					02/24/1997
TCLP-2,4-Dinitrotoluene	434	418	0.10	mg/L	0.056	56.0					02/24/1997
TCLP-Hexachlorobenzene	434	418	0.10	mg/L	0.050	50.0					02/24/1997
TCLP-Hexachlorobutadiene	434	418	0.10	mg/L	0.038	38.0					02/24/1997
TCLP-Hexachloroethane	434	418	0.10	mg/L	0.046	46.0					02/24/1997
TCLP-Nitrobenzene	434	418	0.10	mg/L	0.058	58.0					02/24/1997
TCLP-Pyridine	434	418	0.10	mg/L	0.061	61.0					02/24/1997
TCLP-8240											
TCLP-Benzene		1173	0.020	mg/L	0.023	115.0					02/27/1997
TCLP-2-Butanone (MEK)		1173	0.020	mg/L	0.025	125.0					02/27/1997
TCLP-Carbon Tetrachloride		1173	0.020	mg/L	0.020	100.0					02/27/1997
TCLP-Chlorobenzene		1173	0.020	mg/L	0.023	115.0					02/27/1997
TCLP-Chloroform		1173	0.020	mg/L	0.022	110.0					02/27/1997
TCLP-1,2-Dichloroethane		1173	0.020	mg/L	0.021	105.0					02/27/1997

LCS - Laboratory Control Standard

For samples with insufficient sample volume, an LCS/LCS duplicate is reported instead of an MS/MSD.



QUALITY CONTROL REPORT
LABORATORY CONTROL STANDARD

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Analyte	Prep Batch No.	Run Batch No.	LCS True Conc	Units	LCS Conc Found	LCS % Rec.	LCS Dup Conc. Found	LCS Dup % Rec	LCS % RPD	Flag	Date Analyzed
TCLP-1,1-Dichloroethene		1173	0.020	mg/L	0.021	105.0					02/27/1997
TCLP-Tetrachloroethene		1173	0.020	mg/L	0.027	135.0					02/27/1997
TCLP-Trichloroethene		1173	0.020	mg/L	0.023	115.0					02/27/1997
TCLP-Vinyl chloride		1173	0.020	mg/L	0.018	90.0					02/27/1997

LCS - Laboratory Control Standard

For samples with insufficient sample volume, an LCS/LCS duplicate is reported instead of an MS/MSD.

Received
FEB 1997
Hobbs
OCD

SPIKES

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Date Analyzed	Units	Prep Batch Number	Run Batch Number	Spiked Sample Result	Sample Result	Spike Amount	Percent Recovery
Cyanide, Reactive		02/24/1997	mg/kg		496	298	<0.25	1000	29.8
Sulfide, Reactive		02/24/1997	mg/kg		519	240	<12.5	250	96.0

Advisory Control Limits for Percent Recovery are 85-115%.

Received
Hobbs
OCD
FEB 1997

CHAIN OF CUSTODY RECORD

EPIC LABORATORIES, INC.
1548 VALWOOD PARKWAY, SUITE 118
CARROLLTON, TEXAS 75006
DALLAS (972) 406-8100
AUSTIN (512) 928-8905

COMPANY: Basken Oil Tools — Hobbs NM 88240
ADDRESS: 507 WEST County Road — Hobbs NM
PHONE: 505-397-3671 FAX: 505-393-4213
PROJECT NAME/LOCATION: Hobbs Sump
PROJECT NUMBER:
PROJECT MANAGER:

REPORT TO: Ray Dockery
INVOICE TO: Ray Dockery
P.O. NO.:
EPIC QUOTE NO.:

SAMPLER BY (PRINT NAME): Dennis Collins Jr — B.W. Russell
SIGNATURE: Bill Russell

To assist us in selecting the proper method:
Is this work being conducted for regulatory compliance monitoring? Yes ✓ No
Is this work being conducted for regulatory enforcement action? Yes No ✓
Which regulations apply: RCRA ___ NPDES Wastewater ___ UST ___ Drinking Water ___ Other ___ None ___

#	TIME	SAMPLE ID/DESCRIPTION	MATRIX	GRAB	COMP	# and Type of Containers: HCl	HNO3	H2SO4	OTHER	TCLP-metals	TCLP semi-vols	TCLP-volatiles	BTEX
1	2/13/97 1130	#1 - Sump (MAIN)	WL		X				1	✓	✓	✓	✓
2	2/13/97 0730	#2 - Sump (MAIN)	WL		X				1	✓	✓	✓	✓

COMMENTS

Received Hobbs OCD 2/18

CONDITION OF SAMPLE: BOTTLES INTACT? YES / NO — FIELD FILTERED? YES / NO
COC SEALS PRESENT AND INTACT? YES / NO — VOLATILES FREE OF HEADSPACE? YES / NO
TEMPERATURE UPON RECEIPT: 4°C
Bottles supplied by EPIC? YES / NO

SAMPLE REMAINDER DISPOSAL: RETURN SAMPLE REMAINDER TO CLIENT VIA ___
I REQUEST EPIC TO DISPOSE OF ALL SAMPLE REMAINDERS ✓
DATE ___

RELINQUISHED BY:	DATE	TIME	RECEIVED BY:	RELINQUISHED BY:	DATE	TIME	RECEIVED FOR EPIC BY:
					2/14/97	1040	Barbara Walker

METHOD OF SHIPMENT: FED EX -

REMARKS: Sumps was stirred with the for 30 min. Sample was taken 1 FOOT from bottom with a trap Sampler.

PT 1 - ORIGINAL - WHITE PT 2 - EPIC PROJECT MANAGER - YELLOW PT 3 - CUSTOMER COPY - PINK

EPIC LABS INC 972 484 1387 15:54 02/28/97

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-1
Originated 8/1

Submit Orig
Plus 1 C
to appropr
District O

RECEIVED
FEB 20 1998
Environmental Bureau
Oil Conservation Division

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ BY WPRICE 2/16/98 Verbal Approval Received: Yes ☒ No ☐	4. Generator Baker Oil Tools
	5. Originating Site Hobbs facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Rowland Trucking
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 507 West County Road Hobbs	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Baker Oil Tools Hobbs facility. The waste was genreated by steaming tool. This waste has been approved in the paste. I have included a certificate of waste and a chain of custody.

Please Notify Baker Oil Tools

02-013 Last Approval For Sample Period
2-12-97

Must Resample & Analyze this Waste Stream
MJK

FEB 1998 Received Hobbs OCD

Mailed to Hobbs 2/23/98

Estimated Volume 60 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Office Manager DATE: 02/11/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: ENVR ENGR DATE: 2/16/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 2/20/98

BAKER OIL TOOLS

FAX TRANSMITTAL MEMO

HOBBS, NEW MEXICO

Telephone: 505-397-3671 • Fax: 505-393-4213

Date:	2-23-98		
To:	Billie Charo	**From:**	Ray Dockery
Location:		**Ref:**	
Company:	CRI	**Subject:**	Sump disposal
Fax No.:	393-3615	**# pgs:(inc. this pg)**	2
Copy:			

The waste we are sending remains the same as previously tested.

Ray Dockery

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR Baker Oil Tools

ADDRESS P O Box 1828 Hobbs, NM 88240

GENERATING SITE 507 West County Road Hobbs

COUNTY Lea **STATE** NM

TYPE OF WASTE Sump water

ESTIMATED VOLUME 60 bbls

GENERATING PROCESS Steaming tools

REMARKS

NMOCD FACILITY **CONTROLLED RECOVERY INC.**

TRUCKING COMPANY Rowland Trucking

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT Ray Dockery
SIGNATURE

NAME Ray Dockery
PRINTED

ADDRESS P O Box 1828

Hobbs, NM 88240

DATE 2-23-98

FEB 1998 Received Hobbs OCD

TOTAL P.02

EPIC LABORATORIES, INC.

ANALYTICAL AND QUALITY CONTROL REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

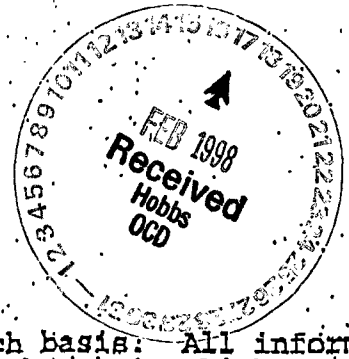
EPIC Job Number: 97.00485

Page 1

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Enclosed are the Analytical Results and Quality Control Data Reports for the following samples submitted to EPIC Laboratories, Inc. for analysis:

Sample Number	Sample Description	Date Taken	Time Taken	Date Received
328563	#1 Sample (Main)	02/12/1997	07:30	02/14/1997
328565	Sample #2 (Main)	02/12/1997	07:30	02/14/1997



This Quality Control report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

Cathy Cuney for
Jim Rowley
Project Manager

NOTE: Results apply only to the samples analyzed. Reproduction of this report is permitted only in its entirety.

ANALYTICAL RESULTS REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

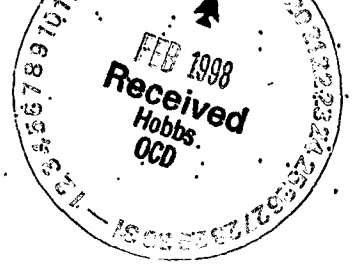
EPIC Job Number: 97.00485
Sample Number: 328563

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Sample Description: #1 Sample (Main)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
Cyanide, Reactive		<0.25	mg/kg	S-7.3.3.1		02/24/1997	kwo		496	0.25
pH, Corrosivity		7.39	units	S-7.2.2		02/20/1997	cgl		1400	N/A
Sulfide, Reactive		30	mg/kg	S-7.3.4.1		02/24/1997	kwo		510	12.5
TCLP-Arsenic, ICP		<0.03	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1516	0.03
TCLP-Barium, ICP		0.22	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1403	0.01
TCLP-Cadmium, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1578	0.01
TCLP-Chromium, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1577	0.01
TCLP-Lead, ICP		0.12	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1586	0.05
TCLP-Mercury, CVAA	EDL	<0.02	mg/L	S-7470A		02/19/1997	bwb		1334	0.0002
TCLP-Selenium, ICP		<0.04	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1515	0.04
TCLP-Silver, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1568	0.01
Ignitability	DNB	>200		ASTM D4982-89		02/21/1997	bab		511	
TCLP-ACID EXTRACTABLES - 8270					02/20/1997					
TCLP-Cresols, Total		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Pentachlorophenol		<0.33	mg/L	S-8270A		02/24/1997	dtw	434	419	0.33
TCLP-2,4,5-Trichlorophenol		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-2,4,6-Trichlorophenol		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
SURR: 2-Fluorophenol		26	% Rec	S-8270A		02/24/1997	dtw	434	419	21-100
SURR: Phenol-d5		20	% Rec	S-8270A		02/24/1997	dtw	434	419	10-94
SURR: 2,4,6-Tribromophenol		68	% Rec	S-8270A		02/24/1997	dtw	434	419	10-123
TCLP-BASE NEUTRALS - 8270					02/20/1997					
TCLP-1,4-Dichlorobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-2,4-Dinitrotoluene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Hexachlorobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Hexachlorobutadiene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Hexachloroethane		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Nitrobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Pyridine		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
SURR: 2-Fluorobiphenyl		99	% Rec	S-8270A		02/24/1997	dtw	434	418	43-116
SURR: Nitrobenzene-d5		64	% Rec	S-8270A		02/24/1997	dtw	434	418	35-114
SURR: Terphenyl-d14		98	% Rec	S-8270A		02/24/1997	dtw	434	418	33-141

DNB - Does not burn.
EDL - Elevated Detection Limit due to matrix interference.



ANALYTICAL RESULTS REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485
Sample Number: 328563

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Sample Description: #1 Sample (Main)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
TCLP-8240										
TCLP-Benzene		0.055	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-2-Butanone (MEK)		<0.50	mg/L	S-8240A		02/27/1997	acg		1173	0.50
TCLP-Carbon Tetrachloride		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Chlorobenzene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Chloroform		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-1,2-Dichloroethane		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-1,1-Dichloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Tetrachloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Trichloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Vinyl chloride		<0.05	mg/L	S-8240A		02/27/1997	acg		1173	0.05
SURR: 1,2-Dichloroethane-d4		107	% Rec	S-8240A		02/27/1997	acg		1173	76-114
SURR: Toluene-d8		109	% Rec	S-8240A		02/27/1997	acg		1173	88-110
SURR: 4-Bromofluorobenzene		105	% Rec	S-8240A		02/27/1997	acg		1173	86-115

ANALYTICAL RESULTS REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1628
Hobbs, NM 88240

02/28/1997

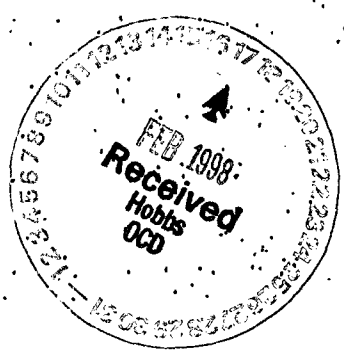
EPIC Job Number: 97.00485
Sample Number: 328565

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Sample Description: Sample #2 (Main)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
Cyanide, Reactive		<0.25	mg/kg	S-7.3.3.1		02/24/1997	kwo		496	0.25
pH, Corrosivity		7.61	units	S-7.2.2		02/20/1997	cgl		1400	N/A
Sulfide, Reactive		<12.5	mg/kg	S-7.3.4.1		02/24/1997	kwo		519	12.5
TCLP-Arsenic, ICP		<0.03	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1516	0.03
TCLP-Barium, ICP		0.20	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1403	0.01
TCLP-Cadmium, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1578	0.01
TCLP-Chromium, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1577	0.01
TCLP-Lead, ICP		0.1	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1586	0.01
TCLP-Mercury, CVAA	EDL	<0.02	mg/L	S-7470A		02/19/1997	bwh		1534	0.0002
TCLP-Selenium, ICP		<0.04	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1515	0.04
TCLP-Silver, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1568	0.01
Ignitability	DNB	>200		ASTM D4982-89		02/21/1997	bsa		511	
TCLP-ACID EXTRACTABLES - 8270					02/20/1997					
TCLP-Cresols, Total		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Pentachlorophenol		<0.33	mg/L	S-8270A		02/24/1997	dtw	434	419	0.33
TCLP-2,4,5-Trichlorophenol		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-2,4,6-Trichlorophenol		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
SURR: 2-Fluorophenol		93	% Rec	S-8270A		02/24/1997	dtw	434	419	21-100
SURR: Phenol-d5		76	% Rec	S-8270A		02/24/1997	dtw	434	419	10-94
SURR: 2,4,6-Tribromophenol		119	% Rec	S-8270A		02/24/1997	dtw	434	419	10-123
TCLP-BASE NEUTRALS - 8270					02/20/1997					
TCLP-1,4-Dichlorobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-2,4-Dinitrotoluene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Hexachlorobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Hexachlorobutadiene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Hexachloroethane		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Nitrobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Pyridine		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
SURR: 2-Fluorobiphenyl		105	% Rec	S-8270A		02/24/1997	dtw	434	418	43-116
SURR: Nitrobenzene-d5		99	% Rec	S-8270A		02/24/1997	dtw	434	418	35-114
SURR: Terphenyl-d14		76	% Rec	S-8270A		02/24/1997	dtw	434	418	33-141

DNB = Does not burn.
EDL = Elevated Detection Limit due to matrix interference.



ANALYTICAL RESULTS REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485
Sample Number: 328565

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Sample Description: Sample #2 (Main)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
TCLP-8240										
TCLP-Benzene		0.055	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-2-Butanone (MEK)		<0.50	mg/L	S-8240A		02/27/1997	acg		1173	0.50
TCLP-Carbon Tetrachloride		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Chlorobenzene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Chloroform		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-1,2-Dichloroethane		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-1,1-Dichloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Tetrachloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Trichloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Vinyl chloride		<0.05	mg/L	S-8240A		02/27/1997	acg		1173	0.05
SURR: 1,2-Dichloroethane-d4		106	% Rec	S-8240A		02/27/1997	acg		1173	76-114
SURR: Toluene-d8		109	% Rec	S-8240A		02/27/1997	acg		1173	88-110
SURR: 4-Bromofluorobenzene		105	% Rec	S-8240A		02/27/1997	acg		1173	86-115

QUALITY CONTROL REPORT
BLANKS

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

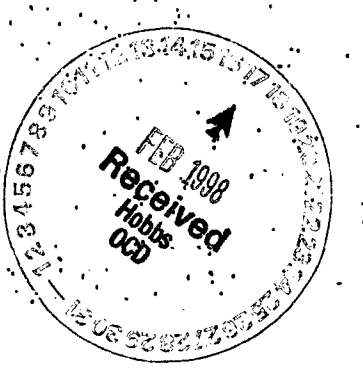
02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Blank Result	Units	Reporting Limit	Date Analyzed	Prep Batch Number	Run Batch Number
Cyanide, Reactive		<0.25	mg/kg	0.25	02/20/1997		496
Sulfide, Reactive		<12.5	mg/kg	12.5	02/24/1997		519
TCLP-Arsenic, ICP		<0.03	mg/L	0.03	02/19/1997	1200	1516
TCLP-Barium, ICP		<0.01	mg/L	0.01	02/19/1997	1200	1403
TCLP-Cadmium, ICP		<0.01	mg/L	0.01	02/19/1997	1200	1578
TCLP-Chromium, ICP		<0.01	mg/L	0.01	02/19/1997	1200	1577
TCLP-Lead, ICP		<0.03	mg/L	0.03	02/19/1997	1200	1586
TCLP-Mercury, CVAA		<0.0002	mg/L	0.0002	02/19/1997		1334
TCLP-Selenium, ICP		<0.04	mg/L	0.04	02/19/1997	1200	1515
TCLP-Silver, ICP		<0.01	mg/L	0.01	02/19/1997	1200	1660
TCLP-ACID EXTRACTABLES - 8270							
TCLP-Cresols, Total		<0.066	mg/L	0.066	02/24/1997	434	419
TCLP-Pentachlorophenol		<0.33	mg/L	0.33	02/24/1997	434	419
TCLP-2,4,5-Trichlorophenol		<0.066	mg/L	0.066	02/24/1997	434	419
TCLP-2,4,6-Trichlorophenol		<0.066	mg/L	0.066	02/24/1997	434	419
TCLP-BASE NEUTRALS - 8270							
TCLP-1,4-Dichlorobenzene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-2,4-Dinitrotoluene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Hexachlorobenzene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Hexachlorobutadiene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Hexachloroethane		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Nitrobenzene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Pyridine		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-8260							
TCLP-Benzene		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-2-Butanone (MEK)		<0.50	mg/L	0.50	02/27/1997		1173
TCLP-Carbon Tetrachloride		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-Chlorobenzene		<0.025	mg/L	0.025	02/27/1997		1173

All parameters should be less than the reporting limit.



QUALITY CONTROL REPORT
BLANKS

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

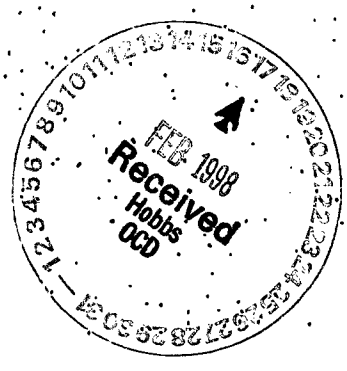
02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Blank Result	Units	Reporting Limit	Date Analyzed	Prep Batch Number	Run Batch Number
TCLP-Chloroform		<0.025	mg/L	0.025	02/27/1997		1172
TCLP-1,2-Dichloroethane		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-1,1-Dichloroethene		<0.025	mg/L	0.025	02/27/1997		1171
TCLP-Tetrachloroethene		<0.025	mg/L	0.025	02/27/1997		1172
TCLP-Trichloroethene		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-Vinyl chloride		<0.05	mg/L	0.05	02/27/1997		1171

All parameters should be less than the reporting limit.



QUALITY CONTROL REPORT
CONTINUING CALIBRATION VERIFICATION STANDARD

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

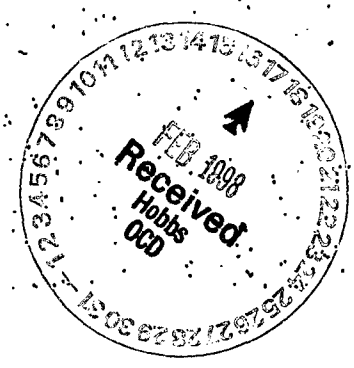
02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	CCVS True Concentration	Units	CCVS Concentration Found	CCVS Percent Recovery	Date Analyzed	Run Batch Number
Cyanide, Reactive		1.0	mg/kg	1.0	100.0	02/24/1997	496
Sulfide, Reactive		1000	mg/kg	1000	100.0	02/24/1997	519
TCLP-Arsenic, ICP		1.00	mg/L	1.10	110.0	02/19/1997	1616
TCLP-Arsenic, ICP		1.00	mg/L	1.10	110.0	02/19/1997	1616
TCLP-Barium, ICP		1.00	mg/L	0.99	99.0	02/19/1997	1603
TCLP-Barium, ICP		1.00	mg/L	0.99	99.0	02/19/1997	1603
TCLP-Cadmium, ICP		1.00	mg/L	1.02	102.0	02/19/1997	1678
TCLP-Cadmium, ICP		1.00	mg/L	1.02	102.0	02/19/1997	1678
TCLP-Chromium, ICP		1.00	mg/L	1.01	101.0	02/19/1997	1677
TCLP-Chromium, ICP		1.00	mg/L	1.01	101.0	02/19/1997	1677
TCLP-Lead, ICP		1.00	mg/L	1.00	100.0	02/19/1997	1686
TCLP-Lead, ICP		1.00	mg/L	1.00	100.0	02/19/1997	1686
TCLP-Mercury, CVAA		0.50	mg/L	0.52	104.0	02/19/1997	1634
TCLP-Selenium, ICP		1.00	mg/L	1.04	104.0	02/19/1997	1615
TCLP-Selenium, ICP		1.00	mg/L	1.04	104.0	02/19/1997	1615
TCLP-Silver, ICP		1.00	mg/L	0.98	98.0	02/19/1997	1568
TCLP-Silver, ICP		1.00	mg/L	0.98	98.0	02/19/1997	1568
TCLP-ACID EXTRACTABLES - 8270							
TCLP-Cresols, Total		0.10	mg/L	0.079	79.0	02/24/1997	419
TCLP-Pentachlorophenol		0.050	mg/L	0.057	114.0	02/24/1997	419
TCLP-2,4,5-Trichlorophenol		0.050	mg/L	0.045	90.0	02/24/1997	419
TCLP-2,4,6-Trichlorophenol		0.050	mg/L	0.045	90.0	02/24/1997	419
TCLP-BASE NEUTRALS - 8270							
TCLP-1,4-Dichlorobenzene		0.050	mg/L	0.040	80.0	02/24/1997	418
TCLP-2,4-Dinitrotoluene		0.050	mg/L	0.044	88.0	02/24/1997	418
TCLP-Hexachlorobenzene		0.050	mg/L	0.055	110.0	02/24/1997	418
TCLP-Hexachlorobutadiene		0.050	mg/L	0.049	98.0	02/24/1997	418
TCLP-Hexachloroethane		0.050	mg/L	0.039	78.0	02/24/1997	418

CCVS - Continuing Calibration Verification Standard



QUALITY CONTROL REPORT
CONTINUING CALIBRATION VERIFICATION STANDARD

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

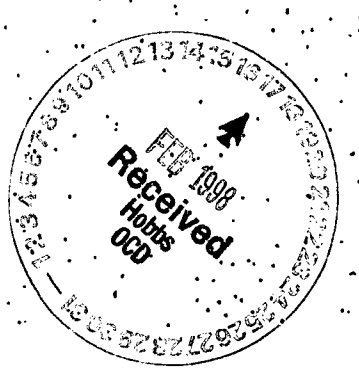
02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	CCVS True Concentration	Units	CCVS Concentration Found	CCVS Percent Recovery	Date Analyzed	Run Batch Number
TCLP-Nitrobenzene		0.050	mg/L	0.040	80.0	02/24/1997	418
TCLP-Pyridine		0.050	mg/L	0.042	84.0	02/24/1997	418
TCLP-8240							
TCLP-Benzene		0.020	mg/L	0.023	115.0	02/27/1997	1173
TCLP-2-Butanone (MEK)		0.020	mg/L	0.023	115.0	02/27/1997	1173
TCLP-Carbon Tetrachloride		0.020	mg/L	0.019	95.0	02/27/1997	1173
TCLP-Chlorobenzene		0.020	mg/L	0.021	105.0	02/27/1997	1173
TCLP-Chloroform		0.020	mg/L	0.022	110.0	02/27/1997	1173
TCLP-1,2-Dichloroethane		0.020	mg/L	0.022	110.0	02/27/1997	1173
TCLP-1,1-Dichloroethene		0.020	mg/L	0.020	100.0	02/27/1997	1173
TCLP-Tetrachloroethene		0.020	mg/L	0.023	115.0	02/27/1997	1173
TCLP-Trichloroethene		0.020	mg/L	0.022	110.0	02/27/1997	1173
TCLP-Vinyl chloride		0.020	mg/L	0.018	90.0	02/27/1997	1173

CCVS - Continuing Calibration Verification Standard.



QUALITY CONTROL REPORT
MATRIX SPIKE/MATRIX SPIKE DUPLICATE

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

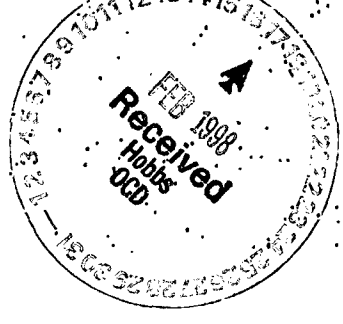
02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Units	Sample Result	Spike Amount Added	Matrix Spike Result	MS Percent Recovery	Duplicate Spike Amount Added	MSD Result	MSD Percent Recovery	MS/MSD RPD	Date Analyzed	Prep Batch Number	Run Batch Number
TCLP-Arsenic, ICP		mg/L	<0.03	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/18/1997		1516
TCLP-Arsenic, ICP		mg/L	<0.03	1.00	1.03	103.0	1.00	1.08	108.0	4.7	02/19/1997	1200	1516
TCLP-Barium, ICP		mg/L	<0.01	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1403
TCLP-Barium, ICP		mg/L	0.57	1.00	1.41	84.0	1.00	1.61	94.0	11.2	02/19/1997	1200	1403
TCLP-Cadmium, ICP		mg/L	<0.01	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1576
TCLP-Cadmium, ICP		mg/L	<0.01	1.00	0.92	92.0	1.00	0.98	98.0	6.3	02/19/1997	1200	1576
TCLP-Chromium, ICP		mg/L	<0.01	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1577
TCLP-Chromium, ICP		mg/L	0.04	1.00	0.95	91.0	1.00	1.03	99.0	8.4	02/19/1997	1200	1577
TCLP-Lead, ICP		mg/L	<0.03	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1586
TCLP-Lead, ICP		mg/L	0.42	1.00	1.30	88.0	1.00	1.38	96.0	8.7	02/19/1997	1200	1586
TCLP-Mercury, CVAA		mg/L	0.0002	0.50	0.50	100.0	0.50	0.50	100.0	0.0	02/19/1997		1334
TCLP-Selenium, ICP		mg/L	<0.04	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/18/1997		1515
TCLP-Selenium, ICP		mg/L	<0.04	1.00	1.05	105.0	1.00	1.14	114.0	8.2	02/19/1997	1200	1515
TCLP-Silver, ICP		mg/L	<0.01	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1568
TCLP-Silver, ICP		mg/L	<0.01	1.00	0.88	88.0	1.00	0.93	93.0	5.5	02/19/1997	1200	1568
TCLP-ACID EXTRACTABLES - 8270													
TCLP-Cresols, Total		mg/L	<0.066	0.30	0.108	36.3	0.30	0.111	37.0	1.9	02/24/1997	434	419
TCLP-Pentachlorophenol		mg/L	<0.33	0.10	0.043	43.0	0.10	0.049	49.0	13.0	02/24/1997	434	419
TCLP-2,4,5-Trichlorophenol		mg/L	<0.066	0.10	0.044	44.0	0.10	0.048	48.0	8.7	02/24/1997	434	419
TCLP-2,4,6-Trichlorophenol		mg/L	<0.066	0.10	0.046	46.0	0.10	0.041	41.0	15.7	02/24/1997	434	419
TCLP-BASE NEUTRALS - 8270													
TCLP-1,4-Dichlorobenzene		mg/L	<0.066	0.10	0.040	40.0	0.10	0.042	42.0	4.9	02/24/1997	434	418
TCLP-2,4-Dinitrotoluene		mg/L	<0.066	0.10	0.043	43.0	0.10	0.044	44.0	2.3	02/24/1997	434	418
TCLP-Hexachlorobenzene		mg/L	<0.066	0.10	0.044	44.0	0.10	0.050	50.0	12.8	02/24/1997	434	418
TCLP-Hexachlorobutadiene		mg/L	<0.066	0.10	0.046	46.0	0.10	0.048	48.0	4.5	02/24/1997	434	418

NOTE: The Quality Control data in this report reflects the batch in which your sample was prepped and/or analyzed. The sample selected for QA may not necessarily be your sample.



QUALITY CONTROL REPORT
MATRIX SPIKE/MATRIX SPIKE DUPLICATE

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

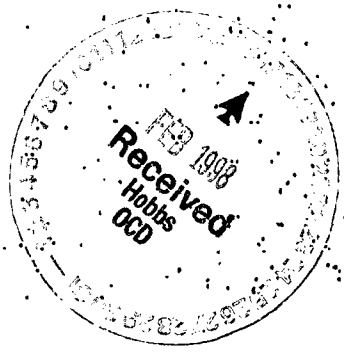
02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Units	Sample Result	Spike Amount Added	Matrix Spike Result	MS Percent Recovery	Duplicate Spike Amount Added	MSD Result	MSD Percent Recovery	MS/MSD RPD	Date Analyzed	Prep Batch Number	Run Batch Number
TCLP-Hexachloroethane		mg/L	<0.066	0.10	0.048	48.0	0.10	0.045	45.0	2.1	02/26/1997	434	418
TCLP-Nitrobenzene		mg/L	<0.066	0.10	0.046	46.0	0.10	0.047	47.0	2.2	02/26/1997	434	418
TCLP-Pyridine		mg/L	<0.066	0.10	0.060	60.0	0.10	0.062	62.0	3.3	02/26/1997	434	418
TCLP-6240													
TCLP-Benzene		mg/L	<0.025	0.020	0.025	125.0	0.020	0.026	125.0	0.0	02/27/1997		1173
TCLP-2-Butanone (MEK)		mg/L	<0.50	0.020	0.019	95.0	0.020	0.018	90.0	5.4	02/27/1997		1173
TCLP-Carbon Tetrachloride		mg/L	<0.025	0.020	0.020	100.0	0.020	0.019	95.0	5.0	02/27/1997		1173
TCLP-Chlorobenzene		mg/L	<0.025	0.020	0.023	115.0	0.020	0.023	115.0	0.0	02/27/1997		1173
TCLP-Chloroform		mg/L	<0.025	0.020	0.024	120.0	0.020	0.023	115.0	4.3	02/27/1997		1173
TCLP-1,2-Dichloroethane		mg/L	<0.025	0.020	0.022	110.0	0.020	0.022	110.0	0.0	02/27/1997		1173
TCLP-1,1-Dichloroethene		mg/L	<0.025	0.020	0.021	105.0	0.020	0.021	105.0	0.0	02/27/1997		1173
TCLP-Tetrachloroethene		mg/L	<0.025	0.020	0.024	120.0	0.020	0.021	105.0	13.3	02/27/1997		1173
TCLP-Trichloroethene		mg/L	<0.025	0.020	0.022	110.0	0.020	0.022	110.0	0.0	02/27/1997		1173
TCLP-Vinyl chloride		mg/L	<0.05	0.020	0.017	85.0	0.020	0.015	75.0	12.5	02/27/1997		1173

NOTE: The Quality Control data in this report reflects the batch in which your sample was prepped and/or analyzed. The sample selected for QA may not necessarily be your sample.



QUALITY CONTROL REPORT
DUPLICATES

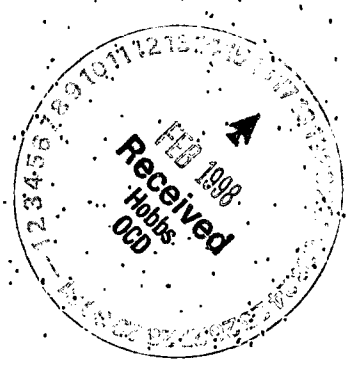
Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Units	Sample Result	Duplicate Sample Result	RPD	Date Analyzed	Prep Batch Number	Run Batch Number
pH, Corrosivity		units	7.24	7.31	0.4	02/20/1997		1400



QUALITY CONTROL REPORT
LABORATORY CONTROL STANDARD

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Analyte	Prep Batch No.	Run Batch No.	LCS True Conc	Units	LCS Conc Found	LCS % Rec.	LCS Dup Conc. Found	LCS Dup % Rec	LCS % RPD	Flag	Date Analyzed
Cyanide, Reactive		496	1000	mg/kg	379	37.9					02/24/1997
pH, Corrosivity		1400	9.18	units	8.94	97.4					02/20/1997
Sulfide, Reactive		519	1000	mg/kg	960	96.0					02/24/1997
TCLP-Arsenic, ICP	1200	1516	1.00	mg/L	1.05	105.0					02/19/1997
TCLP-Barium, ICP	1200	1403	1.00	mg/L	1.00	100.0					02/19/1997
TCLP-Cadmium, ICP	1200	1576	1.00	mg/L	0.99	99.0					02/19/1997
TCLP-Chromium, ICP	1200	1577	1.00	mg/L	0.99	99.0					02/19/1997
TCLP-Lead, ICP	1200	1566	1.00	mg/L	0.98	98.0					02/19/1997
TCLP-Mercury, CVAA		1324	0.50	mg/L	0.57	114.0					02/19/1997
TCLP-Selenium, ICP	1200	1515	1.00	mg/L	0.97	97.0					02/19/1997
TCLP-Silver, ICP	1200	1568	1.00	mg/L	0.91	91.0					02/19/1997
TCLP-ACID EXTRACTABLES - 8270											
TCLP-Cresols, Total	434	419	0.20	mg/L	0.137	68.7					02/24/1997
TCLP-Pentachlorophenol	434	419	0.10	mg/L	0.038	38.0					02/24/1997
TCLP-2,4,6-Trichlorophenol	434	419	0.10	mg/L	0.047	47.0					02/24/1997
TCLP-2,4,6-Trichlorophenol	434	419	0.10	mg/L	0.057	57.0					02/24/1997
TCLP-BASE NEUTRALS - 8270											
TCLP-1,4-Dichlorobenzene	434	418	0.10	mg/L	0.045	45.0					02/24/1997
TCLP-2,4-Dinitrotoluene	434	418	0.10	mg/L	0.056	56.0					02/24/1997
TCLP-Hexachlorobenzene	434	418	0.10	mg/L	0.050	50.0					02/24/1997
TCLP-Hexachlorobutadiene	434	418	0.10	mg/L	0.038	38.0					02/24/1997
TCLP-Hexachloroethane	434	418	0.10	mg/L	0.045	45.0					02/24/1997
TCLP-Nitrobenzene	434	418	0.10	mg/L	0.058	58.0					02/24/1997
TCLP-Pyridine	434	418	0.10	mg/L	0.061	61.0					02/24/1997
TCLP-8240											
TCLP-Benzene		1173	0.020	mg/L	0.023	115.0					02/27/1997
TCLP-2-Butanone (MEK)		1173	0.020	mg/L	0.025	125.0					02/27/1997
TCLP-Carbon Tetrachloride		1173	0.020	mg/L	0.020	100.0					02/27/1997
TCLP-Chlorobenzene		1173	0.020	mg/L	0.023	115.0					02/27/1997
TCLP-Chloroform		1173	0.020	mg/L	0.022	110.0					02/27/1997
TCLP-1,2-Dichloroethane		1173	0.020	mg/L	0.021	105.0					02/27/1997

LCS - Laboratory Control Standard

For samples with insufficient sample volume, an LCS/LCS duplicate is reported instead of an MS/MSD.

Received FEB 1998 Hobbs OCD

QUALITY CONTROL REPORT
LABORATORY CONTROL STANDARD

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

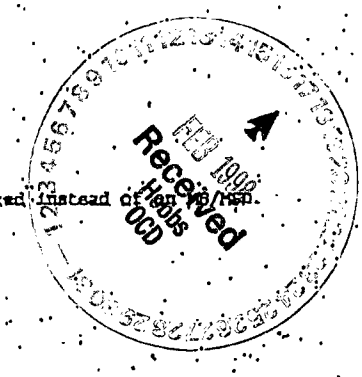
EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Analyte	Prep Batch No.	Run Batch No.	LCS True Conc	Units	LCS Conc Found	LCS % Rec.	LCS Dup Conc. Found	LCS Dup % Rec	LCS % RPD	Flag	Date Analyzed
TCLP-1,1-Dichloroethene		1173	0.020	mg/L	0.021	105.0					02/27/1997
TCLP-Tetrachloroethene		1173	0.020	mg/L	0.027	135.0					02/27/1997
TCLP-Trichloroethene		1173	0.020	mg/L	0.023	115.0					02/27/1997
TCLP-Vinyl chloride		1173	0.020	mg/L	0.018	90.0					02/27/1997

LCS - Laboratory Control Standard

For samples with insufficient sample volume, an LCS/LCS duplicate is reported instead of an MS/MSD.



SPIKES

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Date Analyzed	Units	Prep Batch Number	Run Batch Number	Spiked Sample Result	Sample Result	Spike Amount	Percent Recovery
Cyanide, Reactive		02/24/1997	mg/kg		496	298	<0.25	1000	29.8
Sulfide, Reactive		02/24/1997	mg/kg		515	240	<12.5	250	96.0

Advisory Control Limits for Percent Recovery are 85-115%

CHAIN OF CUSTODY RECORD

EPIC LABORATORIES, INC.
1548 VALWOOD PARKWAY, SUITE 118
CARROLLTON, TEXAS 75006
DALLAS (972) 406-8100
AUSTIN (512) 928-8905

COMPANY: Baker Oil Tools
ADDRESS: 507 West County Road - Hobbs NM 88240
PHONE: 505-397-3671 FAX: 505-393-4213
PROJECT NAME/LOCATION: Hobbs Sump
PROJECT NUMBER:
PROJECT MANAGER:

REPORT TO: Ray Dockery
INVOICE TO: Ray Dockery
P.O. NO.:
EPIC QUOTE NO.:

SAMPLED BY (PRINT NAME): Dennis Collins Jr
SIGNATURE:
(PRINT NAME): B.W. Russell
SIGNATURE: Bill Russell

To assist us in selecting the proper method:
Is this work being conducted for regulatory compliance monitoring? Yes ✓ No
Is this work being conducted for regulatory enforcement action? Yes No ✓
Which regulations apply: RCRA UST Other NPDES Wastewater Drinking Water None

	TIME	SAMPLE ID/DESCRIPTION	MATRIX	GRAB	COMP	# and Type of Containers: HCl	HNO3	H2SO4	OTHER	TCLP-metals	TCLP semi-vols	TCLP-volatiles	BAT
2/14/97	0730	#1 - Sump (Main)	WL		X				1	✓	✓	✓	✓
2/14/97	0730	#2 - Sump (Main)	WL		X				1	✓	✓	✓	✓

COMMENTS

Received Hobbs OCD FEB 1998

CONDITION OF SAMPLE: BOTTLES INTACT? YES / NO
FIELD FILTERED? YES / NO
COC SEALS PRESENT AND INTACT? YES / NO
VOLATILES FREE OF HEADSPACE? YES / NO
TEMPERATURE UPON RECEIPT: 4°C
Bottles supplied by EPIC? YES / NO

SAMPLE REMAINDER DISPOSAL: RETURN SAMPLE REMAINDER TO CLIENT VIA
I REQUEST EPIC TO DISPOSE OF ALL SAMPLE REMAINDERS ✓
DATE

RELINQUISHED BY:	DATE	TIME	RECEIVED BY:	RELINQUISHED BY:	DATE	TIME	RECEIVED FOR EPIC BY:
					2/14/97	1040	Charles Walker

METHOD OF SHIPMENT: FED EX -

REMARKS: Sumps were stirred with bit for 30 min. Sample was taken 1 foot from bottom with a trip sampler.

PT1 - ORIGINAL - WHITE PT2 - EPIC PROJECT MANAGER - YELLOW PT3 - CUSTOMER COPY - PINK

EPIC LABS INC

District I - (505) 393-6161
P.O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
FEB 20 1998
Environmental Bureau
Oil Conservation Division

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ W/RICE 2/1/98 Verbal Approval Received: Yes ☒ No ☐	4. Generator B J Services 5. Originating Site Hobbs facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Sonny's
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 2705 W. County Rd	Hobbs, New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the B J Services Hobbs facility. The waste was generated by washing trucks This material has been approved in the past. I have included a certificate of waste and a chain of custody.

02-007

NOTE: PLEASE NOTIFY BJ NEXT SUBMITTAL WILL NEED NEW UP DATED ANALYSIS! Lwkea mjk

FEB 1998 Received Hobbs OCD

Estimated Volume 10 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo Waste Management Facility Authorized Agent TITLE: Office Manager DATE: 02/03/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env Engr DATE: 2/6/98

APPROVED BY: Martyn J Kirby TITLE: Env Geologist DATE: 2/20/98

1998
Received
Hobbs
OCD

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR B.J SERVICES

ADDRESS 2708 W. County Rd

GENERATING SITE WASH BAY

COUNTY Lea STATE NM.

TYPE OF WASTE WASH BAY

ESTIMATED VOLUME 10 Cu. yds ±

GENERATING PROCESS

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY Sonny's

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT Dan V. Miller
SIGNATURE

NAME DAN V. Miller
PRINTED

ADDRESS 2708 W. County Rd

Hobbs NM

DATE JAN. 5 1998

FEB 1998 Received Hobbs OCD

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

February 12, 1997

Mr. Wesley Root
R & B Environmental
P.O. Box 1022
Hobbs, NM 88240

The following report contains analytical results for samples received at Southern Petroleum Laboratories (SPL) on January 29, 1997. The samples were assigned to Certificate of Analysis No. 9701B55 and analyzed for all parameters as listed on the chain of custody.

There were no analytical problems encountered with this group of samples and all quality control data was within acceptance limits.

If you have any questions or comments pertaining to this data report, please do not hesitate to contact me. Please reference the above Certificate of Analysis No. during any inquiries.

Again, SPL is pleased to be of service to you. We anticipate working with you in fulfilling all your current and future analytical needs.

Southern Petroleum Laboratories

Brett VanDelinder
Project Manager

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

SOUTHERN PETROLEUM LABORATORIES, INC.

Certificate of Analysis Number: 97-01-B55

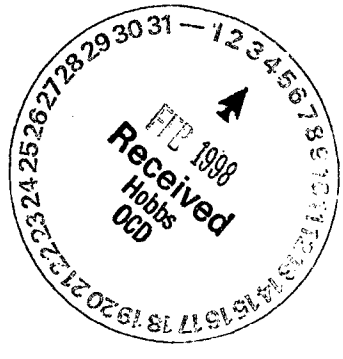
Approved for Release by:

Brett VanDelinder, Project Manager

Date: 2.12.97

Greg Grandits
Laboratory Director

Idelis Williams
Quality Assurance Officer



The attached analytical data package may not be reproduced except in full without the express written approval of this laboratory.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

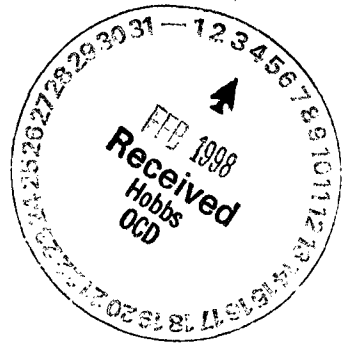
DATE: 02/12/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: SLUDGE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	DETECTION LIMIT	UNITS
Silver, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.01	mg/L
Arsenic, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.2	mg/L
Barium, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	1	mg/L
Cadmium, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.01	mg/L
Chromium, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.02	mg/L
Cyanide-Reactive METHOD 7.3.3.1 *** Analyzed by: IP Date: 02/05/97	ND	10	mg/Kg



ND - Not detected.

Notes: *Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA
**Ref: Standard Methods for Examination of Water & Wastewater, 18th ed.
***Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

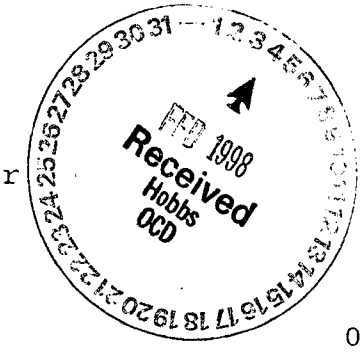
DATE: 02/12/9

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: SLUDGE
DATE SAMPLED: 01/24/97 14:25:0
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	DETECTION LIMIT	UNITS
Flash and Fire Point-Cleveland Open Cup Method ASTM D92-85 Analyzed by: TB Date: 02/04/97	>210		°F
Mercury, TCLP Leachate METHOD 7470 *** Analyzed by: PC Date: 02/10/97	ND	0.0004	mg/L
Acid Digestion of Leachate, ICP METHOD 3010A *** Analyzed by: MM Date: 01/31/97	01/31/97		
Lead, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.1	mg/L
Soil pH Measured in Water METHOD 9045C *** Analyzed by: LAR Date: 01/30/97	5.64		pH units
TCLP Leachate extraction METHOD 1311 *** Analyzed by: WLR Date: 01/30/97	01/30/97		



ND - Not detected.

Notes: *Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA
**Ref: Standard Methods for Examination of Water & Wastewater, 18th ed.
***Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

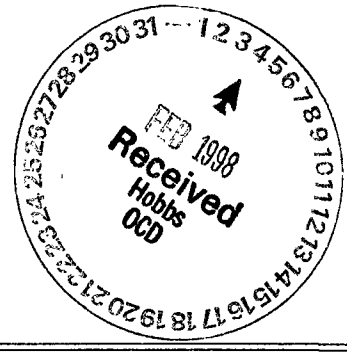
DATE: 02/12/9

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: SLUDGE
DATE SAMPLED: 01/24/97 14:25:0
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	DETECTION LIMIT	UNITS
TCLP Leachate extraction METHOD 1311 *** Analyzed by: WLR Date: 01/30/97	01/30/97		
Zero Headspace extraction METHOD 1311 Analyzed by: WLR Date: 01/30/97	01/30/97		
Selenium, TCLP Leachate METHOD 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.2	mg/L
Sulfide-Reactive METHOD 7.3.4.2 *** Analyzed by: IP Date: 02/05/97	ND	100	mg/Kg



ND - Not detected.

Notes: *Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA
**Ref: Standard Methods for Examination of Water & Wastewater, 18th ed.
***Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

02/12/9

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: LEACHATE
DATE SAMPLED: 01/24/97 14:25:0(
DATE RECEIVED: 01/29/97

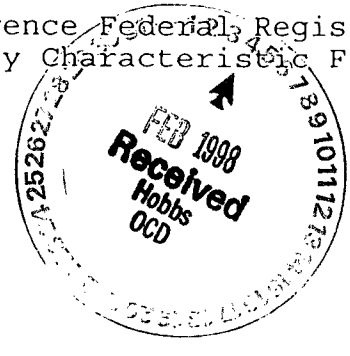
ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS	RL ▲
ortho-Cresol	ND	50	ug/L	200000
meta, para-Cresols	ND	100	ug/L	200000
1,4-Dichlorobenzene	ND	50	ug/L	7500
2,4-Dinitrotoluene	ND	50	ug/L	130
Hexachlorobenzene	ND	50	ug/L	130
Hexachlorobutadiene	ND	50	ug/L	500
Hexachloroethane	ND	50	ug/L	3000
Nitrobenzene	ND	50	ug/L	2000
Pentachlorophenol	ND	250	ug/L	100000
Pyridine	ND	50	ug/L	5000
2,4,5-Trichlorophenol	ND	100	ug/L	400000
2,4,6-Trichlorophenol	ND	50	ug/L	2000

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
Nitrobenzene-d5	50 ug/L	106	35	114
2-Fluorobiphenyl	50 ug/L	94	43	116
Terphenyl-d14	50 ug/L	83	33	141
Phenol-d5	75 ug/L	102	10	110
2-Fluorophenol	75 ug/L	88	21	110
2,4,6-Tribromophenol	75 ug/L	85	10	123

ANALYZED BY: PC DATE/TIME: 02/04/97 17:45:00
LEACHATE EXTRACTION BY: SW DATE/TIME: 01/31/97 13:00:00
METHOD: 1311/8270, TCLP Semivolatiles
NOTES: * - Practical Quantitation Limit ND - Not Detected
NA - Not Analyzed
▲ - Regulatory Limit. Reference Federal Register 55, 11862 (3/29/90), RCRA Toxicity Characteristic Final Rule.

COMMENTS:



QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

02/12/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: LEACHATE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

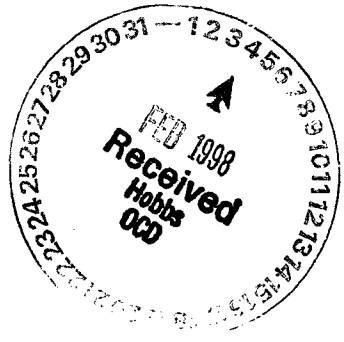
ANALYTICAL DATA

PARAMETER	RESULTS	PQL*		UNITS	RL ▲
Benzene	190	50	MB	ug/L	500
2-Butanone	ND	200		ug/L	200000
Carbon Tetrachloride	ND	50		ug/L	500
Chlorobenzene	ND	50		ug/L	100000
Chloroform	ND	50		ug/L	6000
1,2-Dichloroethane	ND	50		ug/L	500
1,1-Dichloroethene	ND	50		ug/L	700
Tetrachloroethene	ND	50		ug/L	700
Trichloroethene	ND	50		ug/L	500
Vinyl Chloride	ND	100		ug/L	200

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
4-Bromofluorobenzene	50 ug/L	100	86	115
1,2-Dichloroethane-d4	50 ug/L	96	76	114
Toluene-d8	50 ug/L	105	88	110

ANALYZED BY: GT DATE/TIME: 01/31/97 14:46:00
LEACHATE PREP(ZHE) BY: WLR DATE/TIME: 01/30/97
METHOD: 1311/8240, TCLP Volatiles
NOTES: * - Practical Quantitation Limit ND - Not Detected
NA - Not Analyzed
▲ - Regulatory Limit. Reference Federal Register 55, 11862 (3/29/90), RCRA Toxicity Characteristic Final Rule.

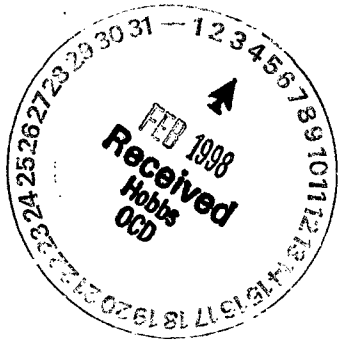
COMMENTS:



QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

QUALITY CONTROL

DOCUMENTATION



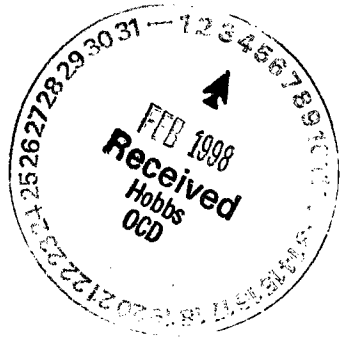
SPL Labs

RECOVERY REPORT

Client Name:
Client SDG: m970127
Sample Matrix: OTHER
Fraction: VOA
Lab Smp Id: 9701915-01AMS-TCLPV/10X
Level: LOW
Operator: GT
Data Type: MS DATA
SampleType: METHSPIKE
SpikeList File: 9701915-01A
Quant Type: ISTD
Method File: /chem/m.i/m970127.b/m8240bwq.m
Misc Info: M027W1/M027S01/M027CW2

SPIKE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
2 Vinyl Chloride	500	570	114.89	50-150
7 1,1-Dichloroethene	500	550	109.70	50-150
14 2-Butanone	500	400	80.00	30-150
17 Chloroform	500	530	106.64	50-150
20 1,2-Dichloroethane	500	500	100.91	50-150
21 Benzene	500	560	111.11	50-150
22 Carbon Tetrachlori	500	500	99.75	50-150
25 Trichloroethene	500	580	116.70	50-150
36 Tetrachloroethene	500	520	104.88	50-150
38 Chlorobenzene	500	510	102.70	50-150

SURROGATE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
$ 18 1,2-Dichloroethane	50	53	105.57	76-114
$ 31 Toluene-d8	50	52	103.52	88-110
$ 46 Bromofluorobenzene	50	49	98.27	86-115



SPL Labs

RECOVERY REPORT

Client Name:
Client SDG: m970127
Sample Matrix: LIQUID
Fraction: VOA
Lab Smp Id: LCS
Level: LOW
Operator: GT
Data Type: MS DATA
SampleType: METHSPIKE
SpikeList File: 8240water.spk
Quant Type: ISTD
Method File: /chem/m.i/m970127.b/m8240bwq.m
Misc Info: M027W1//M027CW2

SPIKE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
7 1,1-Dichloroethene	50	53	105.89	61-145
25 Trichloroethene	50	54	108.09	71-120
21 Benzene	50	55	109.40	76-127
32 Toluene	50	53	106.18	76-125
38 Chlorobenzene	50	49	98.07	75-130

SURROGATE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
$ 18 1,2-Dichloroethane	50	52	103.31	76-114
$ 31 Toluene-d8	50	53	105.46	88-110
$ 46 Bromofluorobenzene	50	49	97.66	86-115

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

SPL Blank QC Report

Matrix: Aqueous
Sample ID: VBLK
Batch: M970131113701

Reported on: 02/03/97 13:2(
Analyzed on: 01/31/97 13:3:
Analyst: GT

METHOD 8240 M031B01

Compound	Result	Detection Limit	Units
Vinyl Chloride	ND	10	ug/L
1,1-Dichloroethene	ND	5	ug/L
2-Butanone	ND	20	ug/L
Chloroform	ND	5	ug/L
1,2-Dichloroethane	ND	5	ug/L
Benzene	ND	5	ug/L
Carbon Tetrachloride	ND	5	ug/L
Trichloroethene	ND	5	ug/L
Tetrachloroethene	ND	5	ug/L
Chlorobenzene	ND	5	ug/L

Surrogate	Result	QC Criteria	Units
1,2-Dichloroethane-d4	104	76-114	% Recovery
Toluene-d8	108	88-110	% Recovery
Bromofluorobenzene	101	86-115	% Recovery

Samples in Batch 9701B55-01

Notes

ND - Not detected.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

SPL Blank QC Report

Matrix: Leachate
Sample ID: TCLPB0130
Batch: M970131113701

Reported on: 02/03/97 13:2(
Analyzed on: 01/31/97 13:54
Analyst: GT

METHOD 8240

Compound	Result	Detection Limit	Units
Vinyl Chloride	ND	10	ug/L
1,1-Dichloroethene	ND	5	ug/L
2-Butanone	ND	20	ug/L
Chloroform	ND	5	ug/L
1,2-Dichloroethane	ND	5	ug/L
Benzene	ND	5	ug/L
Carbon Tetrachloride	ND	5	ug/L
Trichloroethene	ND	5	ug/L
Tetrachloroethene	ND	5	ug/L
Chlorobenzene	ND	5	ug/L

Surrogate	Result	QC Criteria	Units
1,2-Dichloroethane-d4	99	76-114	% Recovery
Toluene-d8	110	88-110	% Recovery
Bromofluorobenzene	100	86-115	% Recovery

Samples in Batch 9701B55-01

Notes

ND - Not detected.

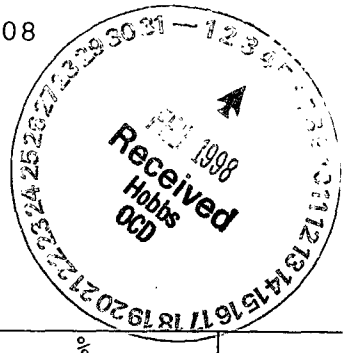
SPL Houston Labs

RECOVERY REPORT

Client Name:
Sample Matrix: LIQUID
Lab Smp Id: 9612E76-07AMS
Level: LOW
Data Type: MS DATA
SpikeList File: tclp.spk
Method File: /chem/h.i/h970108.b/h8270wQ.m
Misc Info: E003F3/H008S06/H008CC1

Client SDG: h970108
Fraction: SV

Operator: LH
SampleType: BLANK
Quant Type: ISTD



SPIKE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
17 ortho-Cresol	750	500	66.49	10-120
20 meta,para-Cresol	1500	870	58.32	10-120
12 1,4-Dichlorobenzen	500	380	75.29	20-124
53 2,4-Dinitrotoluene	500	400	79.65	39-139
63 Hexachlorobenzene	500	230	45.89	0-152
35 Hexachlorobutadien	500	500	100.30	24-116
22 Hexachloroethane	500	330	65.37	40-113
24 Nitrobenzene	500	300	59.34	35-180
64 Pentachlorophenol	750	740	98.46	14-176
2 Pyridine	500	180	36.79	0-150
40 2,4,5-Trichlorophe	750	610	81.10	30-140
39 2,4,6-Trichlorophe	750	480	63.96	37-144

SURROGATE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
$ 23 Nitrobenzene-d5	50	29	58.98	35-114
$ 41 2-Fluorobiphenyl	50	23	46.22	43-116
$ 72 Terphenyl-d14	50	40	80.23	33-141
$ 4 Phenol-d5	75	50	66.21	10-110
$ 3 2-Fluorophenol	75	53	70.78	21-110
$ 61 2,4,6-Tribromophen	75	65	86.15	10-123

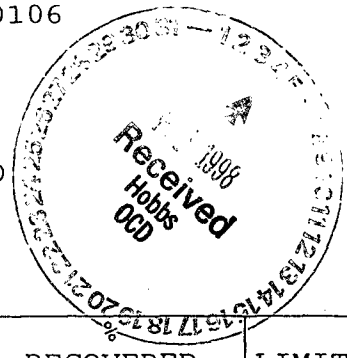
SPL Houston Labs

RECOVERY REPORT

Client Name:
Sample Matrix: LIQUID
Lab Smp Id: LCS
Level: LOW
Data Type: MS DATA
SpikeList File: tclp.spk
Method File: /chem/h.i/h970106.b/h8270wQ.m
Misc Info: E003F3/H003B03/H006CC2

Client SDG: h970106
Fraction: SV

Operator: LH
SampleType: MS
Quant Type: ISTD



SPIKE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
17 ortho-Cresol	75	54	71.66	10-120
20 meta,para-Cresol	150	100	67.45	10-120
12 1,4-Dichlorobenzen	50	39	77.80	20-124
53 2,4-Dinitrotoluene	50	49	97.49	39-139
63 Hexachlorobenzene	50	19	38.44	0-152
35 Hexachlorobutadien	50	53	105.53	24-116
22 Hexachloroethane	50	36	72.52	40-113
24 Nitrobenzene	50	34	68.08	35-180
64 Pentachlorophenol	75	68	90.24	14-176
2 Pyridine	50	28	57.10	0-150
40 2,4,5-Trichlorophe	75	60	79.42	30-140
39 2,4,6-Trichlorophe	75	56	75.02	37-144

SURROGATE COMPOUND	CONC ADDED ug/L	CONC RECOVERED ug/L	% RECOVERED	LIMITS
$ 23 Nitrobenzene-d5	50	34	68.20	35-114
$ 41 2-Fluorobiphenyl	50	32	64.68	43-116
$ 72 Terphenyl-d14	50	47	94.05	33-141
$ 4 Phenol-d5	75	54	72.27	10-110
$ 3 2-Fluorophenol	75	51	68.58	21-110
$ 61 2,4,6-Tribromophen	75	66	88.77	10-123

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

SPL Blank QC Report

Matrix: Aqueous
Sample ID: BLANK
Batch: E970131042249

Reported on: 02/07/97 14:2
Analyzed on: 02/01/97 16:3
Analyst: PC

METHOD 8270 BLANK J031B03

Compound	Result	Detection Limit	Units
Pyridine	ND	5	ug/L
ortho-Cresol	ND	5	ug/L
meta,para-Cresol	ND	10	ug/L
Hexachloroethane	ND	5	ug/L
Nitrobenzene	ND	5	ug/L
Hexachlorobutadiene	ND	5	ug/L
2,4,6-Trichlorophenol	ND	5	ug/L
2,4,5-Trichlorophenol	ND	10	ug/L
2,4-Dinitrotoluene	ND	5	ug/L
Hexachlorobenzene	ND	5	ug/L
Pentachlorophenol	ND	25	ug/L
1,4-Dichlorobenzene	ND	5	ug/L

Surrogate	Result	QC Criteria	Units
2-Fluorobiphenyl	91	43-116	% Recovery
2-Fluorophenol	64	21-110	% Recovery
Nitrobenzene-d5	88	35-114	% Recovery
Phenol-d5	43	10-110	% Recovery
Terphenyl-d14	74	33-141	% Recovery
2,4,6-Tribromophenol	83	10-123	% Recovery

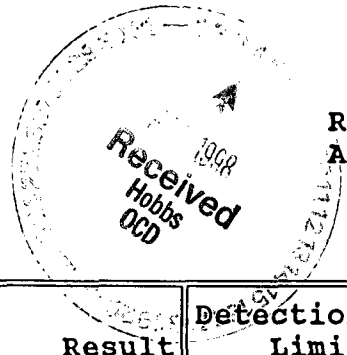
Samples in Batch 9701B55-01

Notes

ND - Not detected.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

SPL Blank QC Report



Matrix: Leachate
Sample ID: BLANK
Batch: E970131042249

Reported on: 02/07/97 14:2
Analyzed on: 02/01/97 17:4
Analyst: PC

METHOD 8270

Compound	Result	Detection Limit	Units
Pyridine	ND	5	ug/L
ortho-Cresol	ND	5	ug/L
meta,para-Cresol	ND	10	ug/L
Hexachloroethane	ND	5	ug/L
Nitrobenzene	ND	5	ug/L
Hexachlorobutadiene	ND	5	ug/L
2,4,6-Trichlorophenol	ND	5	ug/L
2,4,5-Trichlorophenol	ND	10	ug/L
2,4-Dinitrotoluene	ND	5	ug/L
Hexachlorobenzene	ND	5	ug/L
Pentachlorophenol	ND	25	ug/L
1,4-Dichlorobenzene	ND	5	ug/L

Surrogate	Result	QC Criteria	Units
2-Fluorobiphenyl	84	43-116	% Recovery
2-Fluorophenol	56	21-110	% Recovery
Nitrobenzene-d5	84	35-114	% Recovery
Phenol-d5	37	10-110	% Recovery
Terphenyl-d14	72	33-141	% Recovery
2,4,6-Tribromophenol	81	10-123	% Recovery

Samples in Batch 9701B55-01

Notes

ND - Not detected.

ICP Spectroscopy Method 6010 Quality Control Report

Matrix: TCLP Leachate - SOIL
EX1 01/30

Units: mg/L

Analyst: JM

Date:020497 Time:1203 File Name: 020497M2

Checked:

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

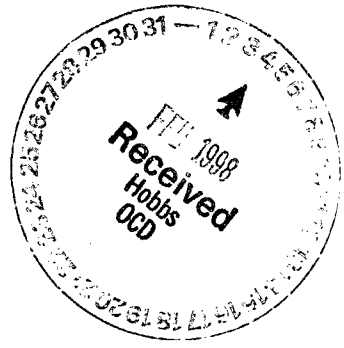
R 2/6/97

Laboratory Control Sample

Element	Mth. Blank	True Value	Result	% Recovery	Lower Limit	Upper Limit
Silver	ND	2.00	1.984	99	1.60	2.40
Arsenic	ND	4.00	3.902	98	3.20	4.80
Barium	ND	2.00	2.057	103	1.60	2.40
Beryllium						
Cadmium	ND	2.00	1.814	91	1.60	2.40
Cobalt						
Chromium	ND	2.00	1.918	96	1.60	2.40
Copper						
Thallium						
Nickel						
Lead	ND	2.00	1.848	92	1.60	2.40
Antimony						
Selenium	ND	4.00	3.936	98	3.20	4.80
Vanadium						
Zinc						

Work Orders in Batch

Work Order	Fractions
97-01-B57	01A-03A
97-01-B55	01A



Matrix Spike - Spike Duplicate Results — Work Order Spiked: 97-01-B57 01A

Element	Sample Result	Spike Added	Matrix Spike Result	Matrix Spike Recovery		Matrix Spike Duplicate Result	Matrix Spike Duplicate Recovery		QC Limits % Recovery		Spike RPD %	QC Limits %
Silver	ND	1.0	0.060	6	*	0.072	7	*	80	120	19.4	20.0
Arsenic	ND	2.0	1.735	87		1.797	90		80	120	3.5	20.0
Barium	0.3855	1.0	1.203	82		1.266	88		80	120	7.4	20.0
Beryllium												
Cadmium	ND	1.0	0.817	82		0.847	85		80	120	3.6	20.0
Cobalt												
Chromium	ND	1.0	0.807	81		0.828	83		80	120	2.5	20.0
Copper												
Thallium												
Nickel												
Lead	ND	1.0	0.831	83		0.856	86		80	120	2.9	20.0
Antimony												
Selenium	ND	2.0	1.728	86		1.789	89		80	120	3.5	20.0
Vanadium												
Zinc												

DIG 25/50

* Spike Results Outside Method Limits

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

** SPL QUALITY CONTROL REPORT **

Matrix: Leachate

Reported on: 02/11/97
Analyzed on: 02/10/97
Analyst: PC

This sample was randomly selected for use in the SPL quality control program. Samples chosen are fortified with a known concentration in duplicate. The results are as follows:

Mercury, TCLP Leachate
METHOD 7470 ***

SPL Sample ID Number	Blank Value mg/L	LCS Concentration mg/L	Measured Concentration mg/L	% Recovery	QC Limits Recovery
LCS	ND	2.00	1.79	89.5	80 - 120

-9702264

Samples in batch:

9701B55-01A

COMMENTS:
LCS = SPL ID# 94-452-30-08

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

** SPL QUALITY CONTROL REPORT **

Matrix: Soil

Reported on: 02/05/97
Analyzed on: 02/05/97
Analyst: IP

This sample was randomly selected for use in the SPL quality control program. The results are as follows:

Cyanide-Reactive
METHOD 7.3.3.1 ***

-- DUPLICATE ANALYSIS --

SPL Sample ID	Original Sample Concentration mg/Kg	Duplicate Sample mg/Kg	RPD	RPD Max.
9701B55-01A	ND	ND	0	20

-9702119

Samples in batch:

9701B02-01A 9701B02-02A 9701B55-01A 9702052-01A

COMMENTS:

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

** SPL QUALITY CONTROL REPORT **

Matrix: Leachate

Reported on: 02/11/97
Analyzed on: 02/10/97
Analyst: PC

This sample was randomly selected for use in the SPL quality control program. Samples chosen are fortified with a known concentration in duplicate. The results are as follows:

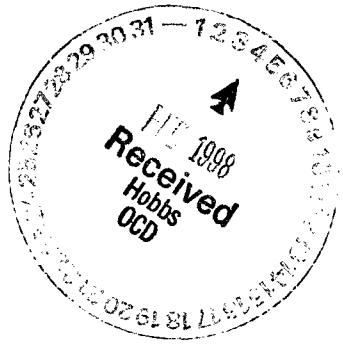
Mercury, TCLP Leachate
METHOD 7470 ***

SPL Sample ID Number	Method Blank mg/L	Sample Result mg/L	Spike Added mg/L	Matrix Spike Result mg/L	Matrix Spike Recovery %	Matrix Spike Duplicate Result mg/L	Matrix Spike Duplicate Recovery %	RPD (%)	QC LIMITS (Advisory) RPD Max	QC LIMITS (Advisory) % REC
9701B55-01A	ND	ND	2.00	1.78	89.0	1.87	93.5	4.9	20	82.3 -125

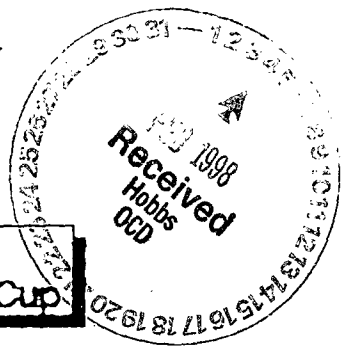
-9702264

Samples in batch:

9701B55-01A



COMMENTS:
LCS = SPL ID# 94-452-30-08



QA/QC FORM
FLASH POINT by Cleveland Open Cup

DATE:	2-4-97		
METHOD:	ASTM D 92-85	# OF SAMPLES:	7
UNITS:	DEG. F	ANALYST:	T Berry

SAMPLE I.D.'s IN SET:

9702048-01A, 9702050-01A, 9702051-01A
9702052-01A, 9701B55-01A, 9701B93-01A
9701B93-02A

REPLICATES

SAMPLE I.D.	RESULT (#1)	DUPLICATE (#2)	DIFFERENCE | #1-#2 |	QC LIMITS
insufficient sample for duplicate analysis				

REVIEWED BY:	Bob Renard	DATE:	2-4-97
APPROVED BY:		DATE:	

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

** SPL QUALITY CONTROL REPORT **

Matrix: Soil

Reported on: 01/30/97
Analyzed on: 01/30/97
Analyst: LAR

This sample was randomly selected for use in the SPL quality control program. The results are as follows:

Soil pH Measured in Water
METHOD 9045C ***

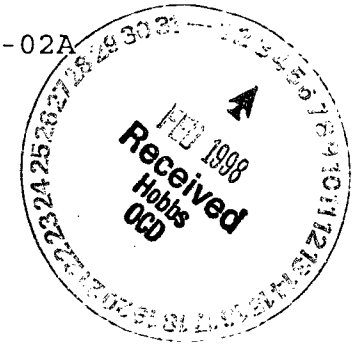
-- DUPLICATE ANALYSIS --

SPL Sample ID	Original Sample Concentration pH units	Duplicate Sample pH units	RPD	RPD Max.
9701B90-01A	9.96	9.95	0.1	1.1

-9701962

Samples in batch:

9701B55-01A 9701B90-01A 9701B93-01A 9701B93-02A



COMMENTS:

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

** SPL QUALITY CONTROL REPORT **

Matrix: Soil

Reported on: 02/05/97
Analyzed on: 02/05/97
Analyst: IP

This sample was randomly selected for use in the SPL quality control program. The results are as follows:

Sulfide-Reactive
METHOD 7.3.4.2 ***

-- DUPLICATE ANALYSIS --

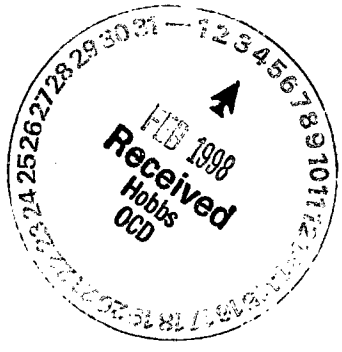
SPL Sample ID	Original Sample Concentration mg/Kg	Duplicate Sample mg/Kg	RPD	RPD Max.
9701B55-01A	ND	ND	0	15

-9702120

Samples in batch:

9701B02-01A 9701B02-02A 9701B55-01A 9702052-01A

COMMENTS:



CHAIN OF CUSTODY

AND

SAMPLE RECEIPT CHECKLIST

11-01-DOO

Environmental Laboratory
8880 Interchange Drive
Houston, Texas 77054
713/660-0901

Analysis Request and Chain of Custody Record

DS

Project No.	Client/Project Name	Project Location
B01501	R & B Environmental P.O. Box 1022 Hobbs, New Mexico 88240	BJ Services 2708 N. West County Road Hobbs, New Mexico 88241

Field Sample No./ Identification	Date and Time	Grab	Comp	Sample Container (Size/Mat'l)	Sample Type (Liquid, Sludge, Etc.)	Preservative	ANALYSIS REQUESTED	LABORATORY REMARKS
SC-1	1-24-97 14:25		V	2 8oz	Sludge	ICE	TCLP VOC - 8240 TCLP metals TCLP SVOC - 8270 RCI	

Received Hobbs OCD JAN 1998

Samplers: (Signature)	Relinquished by: (Signature)	Date: 1-28-97 Time: 17:30	Received by: (Signature)	Date: 1-29-97 Time: 0845	Intact
F. Wesley Root	F. Wesley Root				
R & B Environmental	Relinquished by: (Signature)	Date: Time:	Received by: (Signature)	Date: Time:	Intact
Affiliation					
	Relinquished by: (Signature)	Date: Time:	Received by: (Signature)	Date: Time:	Intact

SAMPLER REMARKS: NORMAL 14 DAY TURN-A-ROUND
Home Phone 505-392-8844

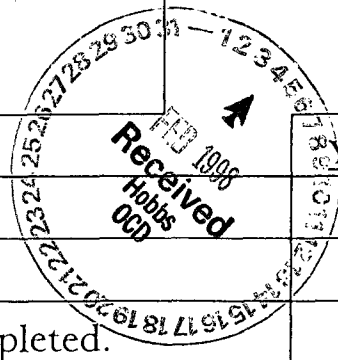
Seal #	Received for laboratory: (Signature)	Date: Time:	Laboratory No.
	Data Results to:		

SPL Houston Environmental Laboratory

Sample Login Checklist

Date:	Time:
1-29-97	0945

SPL Sample ID:
97-01-855



			Yes	No
1	Chain-of-Custody (COC) form is present.		✓	
2	COC is properly completed.		✓	
3	If no, Non-Conformance Worksheet has been completed.			
4	Custody seals are present on the shipping container.		✓	
5	If yes, custody seals are intact.		✓	
6	All samples are tagged or labeled.		✓	
7	If no, Non-Conformance Worksheet has been completed.			
8	Sample containers arrived intact		✓	
9	Temperature of samples upon arrival:		4° C	
10	Method of sample delivery to SPL:	SPL Delivery		
		Client Delivery		
		FedEx Delivery (airbill #)	9699799001	
		Other:		
11	Method of sample disposal:	SPL Disposal	✓	
		HOLD		
		Return to Client		

Name:	Date:
	1-29-97

R & B Environmental

P. O. Box 1022
Hobbs, New Mexico 88240
(505) 392-8844

February 17, 1997

Mr. Dan Miller
B J Services
2708 North West County Road
Hobbs, New Mexico 88240

RE: Waste Characterization
Wash Bay Waste Storage Facility
2708 North West County Road
Hobbs, New Mexico

R & B Project No. B01501

Mr. Miller:

R & B Environmental has completed waste characterization operations at the above listed site as requested by B J Services. The purpose of the sampling event was to characterize the subject waste for waste classification in accordance with RCRA Subtitle C regulations. The scope of work included collecting a composite sample of the subject waste, submitting the sample for laboratory analysis, and documenting the sampling event.

The subject waste consisted of semi-solid sediments contained in underground storage tanks at the waste storage facility located near the northern boundary of B J Services equipment yard. It is our understanding the purpose of the facility is to store waste generated during equipment cleaning operations, typically wash/rinse water, soap, dirt, and any residues that accumulated on the equipment during service in the oilfield.

R & B personnel inspected the facility and sampled the subject waste on January 24, 1997. The facility contained three fiberglass tanks and one sump. Four-point composite samples were obtained from each storage vessel and volumetrically combined to form one composite sample (SC-1).

Prior to collecting samples, the sampling equipment was decontaminated using Liquinox detergent and a distilled water rinse. A soapy water solution and water rinse were used to clean sampling equipment between samples.

SC-1 was placed into glass jars with teflon-lined lids and zero head space, labeled, sealed with QA/QC seals , and preserved on ice in accordance with EPA protocol for laboratory shipment.

The sample was shipped to SPL Laboratory in Houston for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), RCRA metals, and solid waste characteristics (ignitability, corrositivity, reactivity, and toxicity) analysis.

The laboratory analytical results recorded concentrations well below EPA Regulatory Limits and classify the waste as characteristically non-hazardous. A summary of the analytical results are presented in the enclosed tables. Facsimile copies of the laboratory results are attached. We expect to receive the actual laboratory report this week and will forward copies, including chains-of-custody, to you upon receipt.

R & B Environmental appreciates this opportunity to provide you with our professional services. If you have any questions concerning this project, or if we may be of further service, please do not hesitate to contact us.

Respectfully,
R & B Environmental
B01501.SAM

F. Wesley Root

F. Wesley Root
Geologist / Hydrologist

Enclosures

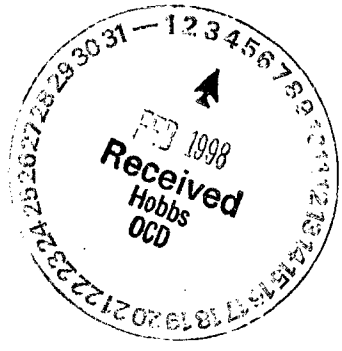


TABLE 1
SUMMARY OF SAMPLE ANALYTICAL RESULTS
TCLP VOLATILE ORGANIC COMPOUNDS (VOCs)
B J Services Wash Bay Storage Facility
R & B Project No. B01501

Volatile Organic Compound Name	Sample ID SC-1 01/24/97	Practical Quantitation Limit (ug/L)	Regulatory Limit (ug/L)
Benzene	190	50	500
2-Butanone	ND	200	200,000
Carbon Tetrachloride	ND	50	500
Chlorobenzene	ND	50	100,000
Chloroform	ND	50	6,000
1,2-Dichloroethane	ND	50	500
1,1-Dichloroethene	ND	50	700
Tetrachloroethene	ND	50	700
Trichloroethene	ND	50	500
Vinyl Chloride	ND	100	200

Analyses were performed using EPA Method 1311 / 8240 by SPL Laboratories.

All results are reported in micrograms per liter; ug/L (parts per billion; ppb). Results liisted in bold type exceed EPA Limits.

ND = Non Detect (concentration less than PQL)

Received
Hobbs
OCD
1998

TABLE 2
SUMMARY OF SAMPLE ANALYTICAL RESULTS
TCLP SEMIVOLATILE ORGANIC COMPOUNDS (SVOCs)
B J Services Wash Bay Storage Facility
R & B Project No. B01501

Volatile Organic Compound Name	Sample ID SC-1 01/24/97	Practical Quantitation Limit (ug/L)	Regulatory Limit (ug/L)
ortho-Cresol	ND	50	200,000
meta, para-Cresols	ND	100	200,000
1,4-Dichlorobenzene	ND	50	7,500
2,4-Dinitrotoluene	ND	50	130
Hexachlorobenzene	ND	50	130
Hexachlorobutadiene	ND	50	500
Hexachloroethane	ND	50	3,000
Nitrobenzene	ND	50	2,000
Pentachlorophenol	ND	250	100,000
Pyridine	ND	50	5,000
2, 4, 5-Trichlorophenol	ND	100	400,000
2, 4, 6-Trichlorophenol	ND	50	2,000

Analyses were performed using EPA Method 1311 / 8270 by SPL Laboratories.

All results are reported in micrograms per liter; ug/L (parts per billion; ppb). Results liisted in bold type exceed EPA Limits.

ND = Non Detect (concentration less than PQL)

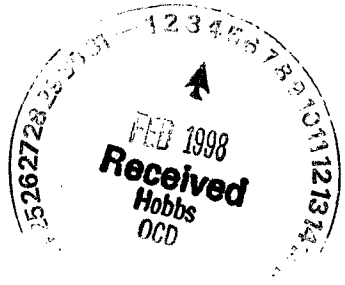
TABLE 3
SUMMARY OF SAMPLE ANALYTICAL RESULTS
RCI & TCLP METALS
B J Services Wash Bay Storage Facility
R & B Project No. B01501

Tested Parameter Name	Units	Sample ID SC-1 01/24/97	Detection Limit	Regulatory Limit
Reactivity (Cyanide)	mg/Kg	ND	10	250
Reactivity (Sulfide)	mg/Kg	ND	100	500
Soil pH	pH units	5.64	N/A	2 to 12.5
Flash & Fire Point	degrees F	>210	N/A	>140
Arsenic (As)	mg/L	ND	0.20	5.00
Selenium (Se)	mg/L	ND	0.20	1.00
Cadmium (Cd)	mg/L	ND	0.01	1.00
Chromium (Cr)	mg/L	ND	0.02	5.00
Lead (Pb)	mg/L	ND	0.10	5.00
Silver (Ag)	mg/L	ND	0.01	5.00
Barium (Ba)	mg/L	ND	1.00	100.00
Mercury (Hg)	mg/L	ND	0.0004	0.20

Analyses were performed by SPL Laboratories.

using EPA Methods: 1311 / 6010A, 7470, SW846/7.3.4.2, 7.3.3.2, 9045C, ASTM D92-85 .

Results liisted in bold type exceed EPA Limits. ND = Non Detect (concentration less than detection limit)



Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

DATE: 02/14/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: SLUDGE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	DETECTION LIMIT	UNITS
Silver, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.01	mg/L
Arsenic, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.2	mg/L
Barium, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	1	mg/L
Cadmium, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.01	mg/L
Chromium, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.02	mg/L
Cyanide-Reactive Method 7.3.3.2 *** Analyzed by: IP Date: 02/05/97	ND	10	mg/Kg

FEB 1998
Received
Hobbs
OCD

ND - Not detected.

Notes: *Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA
**Ref: Standard Methods for Examination of Water & Wastewater, 18th ed.
***Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

DATE: 02/14/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: SLUDGE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	DETECTION LIMIT	UNITS
Flash and Fire Point- C.O.C. Method ASTM D92-85 Analyzed by: TB Date: 02/04/97	>210		°F
Mercury, TCLP Leachate Method 7470 A*** Analyzed by: PC Date: 02/10/97	ND	0.0004	mg/L
Acid Digestion of TCLP Leachate, ICP Method 3010A *** Analyzed by: MM Date: 01/31/97	01/31/97		
Lead, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.1	mg/L
Soil pH Measured in Water Method 9045C *** Analyzed by: LAR Date: 01/30/97	5.64		pH units
TCLP Leachate Extraction Method 1311 *** Analyzed by: WLR Date: 01/30/97	01/30/97		

FEB 1998
Received
Hobbs
OCD

ND - Not detected.

Notes: *Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA
**Ref: Standard Methods for Examination of Water & Wastewater, 18th ed.
***Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

DATE: 02/14/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: SLUDGE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	DETECTION LIMIT	UNITS
TCLP Leachate Extraction Method 1311 *** Analyzed by: WLR Date: 01/30/97	01/30/97		
Zero Headspace extraction Method 1311 Analyzed by: WLR Date: 01/30/97	01/30/97		
Selenium, TCLP Leachate Method 6010A *** Analyzed by: JM Date: 02/04/97	ND	0.2	mg/L
Sulfide-Reactive Method 7.3.4.2 *** Analyzed by: IP Date: 02/05/97	ND	100	mg/Kg

FEB 1998
Received
Hobbs
OCD

ND - Not detected.

Notes: *Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA
**Ref: Standard Methods for Examination of Water & Wastewater, 18th ed.
***Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

02/14/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: LEACHATE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS	RL ▲
ortho-Cresol	ND	50	ug/L	200000
meta, para-Cresols	ND	100	ug/L	200000
1,4-Dichlorobenzene	ND	50	ug/L	7500
2,4-Dinitrotoluene	ND	50	ug/L	130
Hexachlorobenzene	ND	50	ug/L	130
Hexachlorobutadiene	ND	50	ug/L	500
Hexachloroethane	ND	50	ug/L	3000
Nitrobenzene	ND	50	ug/L	2000
Pentachlorophenol	ND	250	ug/L	100000
Pyridine	ND	50	ug/L	5000
2,4,5-Trichlorophenol	ND	100	ug/L	400000
2,4,6-Trichlorophenol	ND	50	ug/L	2000

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
Nitrobenzene-d5	50 ug/L	106	35	114
2-Fluorobiphenyl	50 ug/L	94	43	116
Terphenyl-d14	50 ug/L	83	33	141
Phenol-d5	75 ug/L	102	10	110
2-Fluorophenol	75 ug/L	88	21	110
2,4,6-Tribromophenol	75 ug/L	85	10	123

ANALYZED BY: RC DATE/TIME: 02/04/97 17:45:00
LEACHATE EXTRACTION BY: SW DATE/TIME: 01/31/97 13:00:00
METHOD: 1311/8270, TCLP Semivolatiles
NOTES: * - Practical Quantitation Limit ND - Not Detected
NA - Not Analyzed
▲ - Regulatory Limit. Reference Federal Register 55, 11862 (3/29/90), RCRA Toxicity Characteristic Final Rule.

COMMENTS:

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

Certificate of Analysis No. H9-9701B55-01

R & B Environmental
P.O. Box 1022
Hobbs, NM 88240
ATTN: Wesley Root

02/14/97

PROJECT: BJ Services
SITE: Hobbs New Mexico
SAMPLED BY: R & B Services
SAMPLE ID: SC-1

PROJECT NO: B01501
MATRIX: LEACHATE
DATE SAMPLED: 01/24/97 14:25:00
DATE RECEIVED: 01/29/97

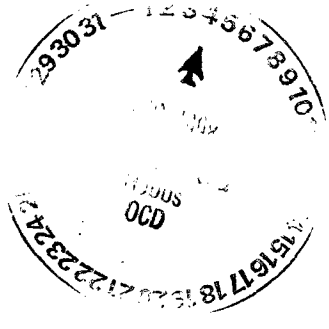
ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS	RL ▲
Benzene	190	50	ug/L	500
2-Butanone	ND	200	ug/L	200000
Carbon Tetrachloride	ND	50	ug/L	500
Chlorobenzene	ND	50	ug/L	100000
Chloroform	ND	50	ug/L	6000
1,2-Dichloroethane	ND	50	ug/L	500
1,1-Dichloroethene	ND	50	ug/L	700
Tetrachloroethene	ND	50	ug/L	700
Trichloroethene	ND	50	ug/L	500
Vinyl Chloride	ND	100	ug/L	200

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
4-Bromofluorobenzene	50 ug/L	100	86	115
1,2-Dichloroethane-d4	50 ug/L	96	76	114
Toluene-d8	50 ug/L	105	88	110

ANALYZED BY: GT DATE/TIME: 01/31/97 14:46:00
LEACHATE PREP(ZHE) BY: WLR DATE/TIME: 01/30/97
METHOD: 1311/8240, TCLP Volatiles
NOTES: * - Practical Quantitation Limit ND - Not Detected
NA - Not Analyzed
▲ - Regulatory Limit. Reference Federal Register 55, 11862 (3/29/90), RCRA Toxicity Characteristic Final Rule.

COMMENTS:



QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

January 24, 1997

Mr. Ken Marsh
Controlled Recovery, Inc. (CRI)
P.O. Box 369
Hobbs, NM 88241

RE: Wastewater Solids /Slurry Disposal at BJ Services Company, U.S.A. Hobbs Facility

Dear Mr. Marsh:

The purpose of this letter is to request sampling and disposal of wastewater solids located at the BJ Services facility in Hobbs, New Mexico. The facility is phisically located at 2708 West County Road in Hobbs. The wastewater solids are located in four tanks (capacities: one 800 gallon and three 12,000 gallon) along the fenceline at the facility. As of the time of this letter, the quantity of wastewater solids is unknown. The wastewater originated from the washrack facility on the BJ Services site as a result of pressure washing activities by BJ.

Therefore, I am requesting the following services from CRI:

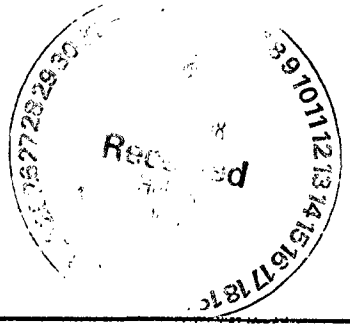
- sample the wastewater solids contained in the tanks (a composite of all four tanks would be sufficient);
- have the wastewater solids sample analyzed for the constituents required for disposal by the New Mexico Oil Conservation Division (NMOCD) (Full TCLP and RCI);
- seek approval for disposal of the wastewater solids from NMOCD;
- transport the wastewater solids to your NMOCD approved disposal site;
- dispose of the wastewater solids.

If you have any questions regarding this request, please call me at (281) 363-7521.

Sincerely,

Rick N. Johnson
Environmental Specialist

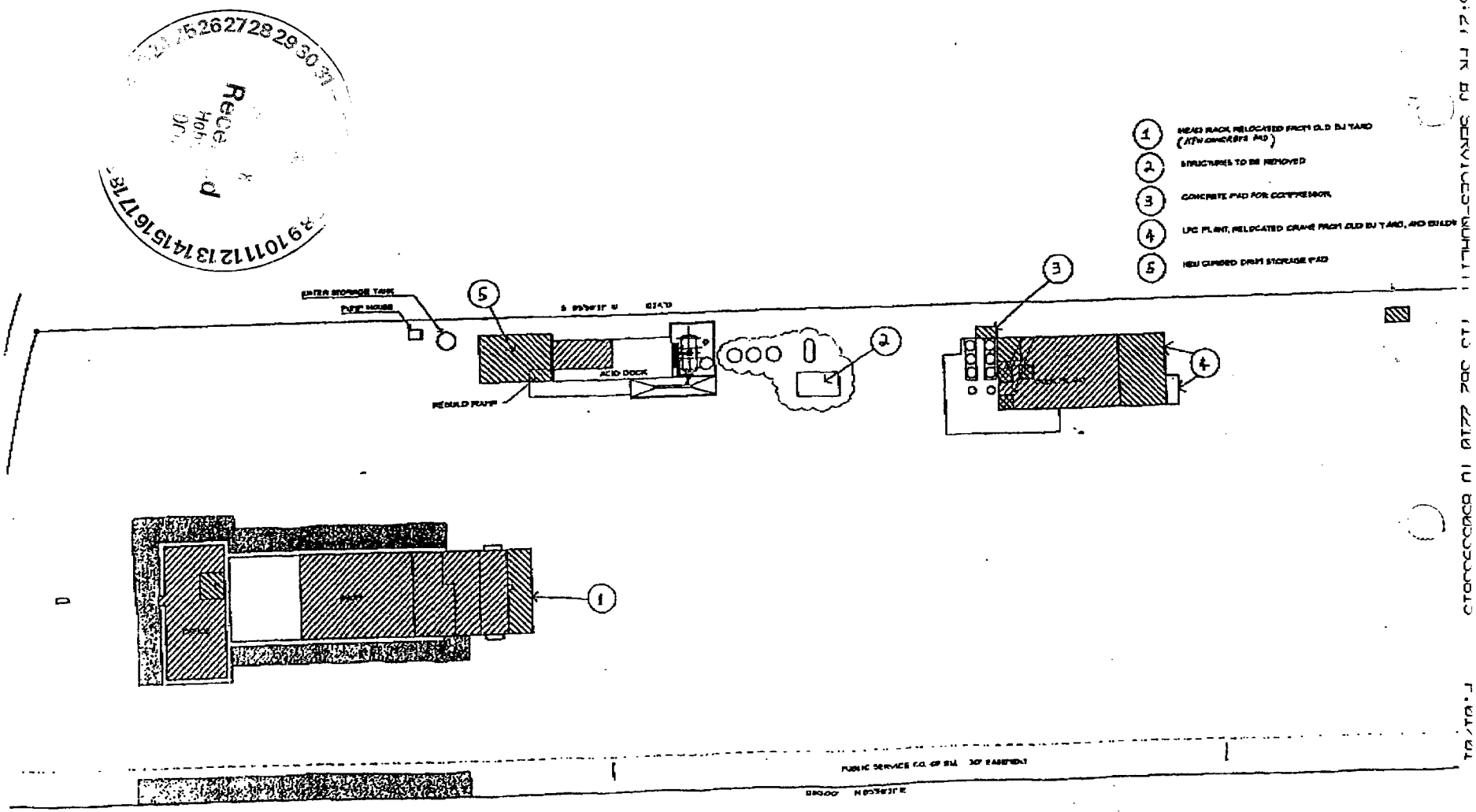
Post-it® Fax Note 7671	Date 1-24	# of pages ▶ 1
To Billie / ART / Ken	From Rick Johnson	
Co./Dept. CRI	Co. BJ	
Phone #	Phone # 281-363-7521	
Fax # 505-393-3615	Fax #	



To: Ken Marsh -CRI

From: Rick N. Johnson -DTS

Here is the site plan for Hobbs, #2 is the tank area.



JAN 27 '97 10:21 FR DJ SERVICES-HOBBS NM 505 392 2210 TO 8965555555 P.02/02

** TOTAL PAGE.01 **

P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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DEC 03 1997
Environmental Bureau
Oil Conservation Division

Form C
Originated

Submit O
Plus 1
to appro
District

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator B J Services
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Hobbs Yard
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Sonny's
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State NM
7. Location of Material (Street Address or ULSTR) 2708 W County Road	Hobbs NM

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the BJ Services Hobbs yard. The wash bay waste was generated by truck washing. I have included a certificate of waste and a chain of custody. This material has been approved in the past. The waste stream has not changed.

DEC 1997 Received Hobbs OCD

NOV 1997 Received Hobbs OCD

Estimated Volume 10 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility Authorized Agent) TITLE: Office Manager DATE: 11/20/97

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env Engr DATE: 11/28/97

APPROVED BY: _____ TITLE: Env Geologist DATE: 12/3/97

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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Environmental Bureau
Oil Conservation Division

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District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ WRIGHT 2/6/98 Verbal Approval Received: Yes ☒ No ☐	4. Generator B J Services
	5. Originating Site Hobbs facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Sonny's
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 5514 Carlsbad HWY	Hobbs, New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

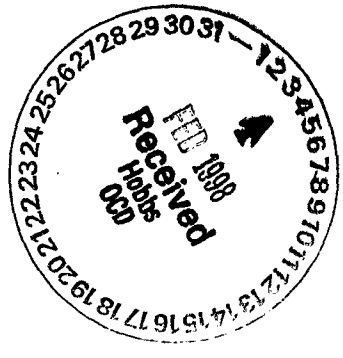
B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the BJ Services Hobbs facility. The waste was generated by rain water which has collected in a former sump system I have included a certificate of waste and a chain of custody.

02-005



mailed to Hobbs 2/23/98

Estimated Volume 4,000 gallons cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Office Manager DATE: 02/03/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: 2/6/98

APPROVED BY: _____ TITLE: Env. Geologist DATE: 2/20/98

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR BJ SERVICES COMPANY, U.S.A.

ADDRESS 8701 NEW TRAILS DRIVE, THE WOODLANDS, TX 77381

GENERATING SITE 5514 CARLSBAD HWY., HOBBS, NEW MEXICO 88240

COUNTY LEA STATE NEW MEXICO

TYPE OF WASTE SUMP WATER

ESTIMATED VOLUME 4,000 GALLONS

GENERATING PROCESS RAINWATER WHICH HAS COLLECTED IN A FORMER SUMP SYSTEM.

REMARK'S SOME WATER HAS BEEN PUMPED INTO A HOLDING TANK

NMOCD FACILITY CONTROLLED RECOVERY, INC.

TRUCKING COMPANY SONNY'S

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a " hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT Timothy L. Jenkins as agent for BJ Services
SIGNATURE

NAME TIMOTHY L. JENKINS
PRINTED

ADDRESS BROWN AND CALDWELL
1415 LOUISIANA, STE. 2500
HOUSTON, TEXAS 77002

DATE 02/03/98

Certificate of Analysis

Quanterra Incorporated
5307 Industrial Oaks Boulevard, Suite 160
Austin, Texas 78735

512 892-6684 Direct
512 892-6652 Fax

ANALYTICAL REPORT

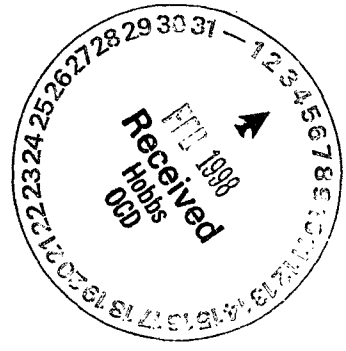
HOBSCO

Lot #: I7K210132

TIM JENKINS

Brown & Caldwell

QUANTERRA INCORPORATED



Sandra L. Green
Project Manager

December 19, 1997

Quanterra
Environmental Services

SAMPLE SUMMARY

I7K210132

WO #	SAMPLE#	CLIENT SAMPLE ID	DATE	TIME
CE5M4	002	NWFT-L	11/20/97	10:25
CE5M8	005	SB-3-40	11/19/97	09:40
CE5M9	006	SB-3-45	11/19/97	10:00
CE5MG	010	WSW-1	11/20/97	12:00

NOTE(S):

- The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit.
- This report must not be reproduced, except in full, without the written approval of the laboratory.
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.

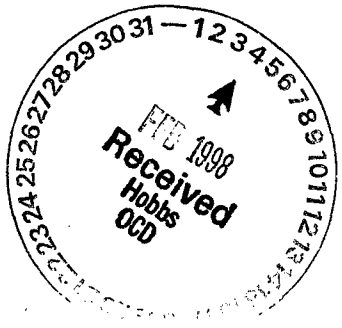
Quanterra
Environmental Services

QC DATA ASSOCIATION SUMMARY

I7K210132

Sample Preparation and Analysis Control Numbers

SAMPLE#	MATRIX	ANALYTICAL METHOD	LEACH BATCH #	PREP BATCH #	MS RUN#
002	WATER	SW846 1010		7330225	7330082
	WATER	MCAWW 150.1		7325189	7325073
	WATER	SW846 6010A	P733605	7337204	7337077
	WATER	SW846 7470	P733605	7339177	7339065
	WATER	SW846 7.3.3		7329187	7329063
	WATER	SW846 7.3.4		7329190	7329066
	WATER	SW846 8270B	P733605	7337171	7337055
	WATER	SW846 8240B	P733803	7345254	7345109
005	SOLID	OCLP OLM03.1		7325240	7325125
	SOLID	SW846 8020/GRO		7325184	7325122
006	SOLID	OCLP OLM03.1		7325240	7325125
	SOLID	SW846 8020/GRO		7326138	7326023
010	WATER	MCAWW 300.0A		7330191	7330055
	WATER	MCAWW 300.0A		7330192	7330056
	WATER	MCAWW 300.0A		7330187	7330053
	WATER	MCAWW 300.0A		7330181	7330050
	WATER	MCAWW 300.0A		7330173	7330047
	WATER	SW846 6010A		7335237	7335105
	WATER	SW846 8020/GRO		7335198	7335078
	WATER	SW846 7470A		7330168	7330043
	WATER	MCAWW 310.1		7335259	7335124



Quanterra Environmental Services

BROWN & CALDWELL

Client Sample ID: MWFT-L

TCLP GC/MS Semivolatiles

Lot-Sample #...:	I7K210132-002	**Work Order #...:**	CE5M4105	**Matrix.....:**	WATER
Date Sampled...:	11/20/97 10:25	**Date Received..:**	11/21/97		
Leach Date.....:	12/01/97	**Prep Date.....:**	12/03/97	**Analysis Date..:**	12/09/97
Leach Batch #..:	P733605	**Prep Batch #...:**	7337171	**Analysis Time..:**	19:46
Dilution Factor:	1				

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
o-Cresol	**0.061**	**0.050**	**mg/L**	**SW846 8270B**
m-Cresol & p-Cresol	ND	0.10	mg/L	SW846 8270B
1,4-Dichlorobenzene	ND	0.050	mg/L	SW846 8270B
2,4-Dinitrotoluene	ND	0.050	mg/L	SW846 8270B
Hexachlorobenzene	ND	0.050	mg/L	SW846 8270B
Hexachlorobutadiene	ND	0.050	mg/L	SW846 8270B
Hexachloroethane	ND	0.050	mg/L	SW846 8270B
Nitrobenzene	ND	0.050	mg/L	SW846 8270B
Pentachlorophenol	ND	0.25	mg/L	SW846 8270B
Pyridine	ND	0.10	mg/L	SW846 8270B
2,4,5-Trichlorophenol	ND	0.050	mg/L	SW846 8270B
2,4,6-Trichlorophenol	ND	0.050	mg/L	SW846 8270B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
2-Fluorophenol	59	(21 - 100)
Phenol-d5	73	(10 - 94)
Nitrobenzene-d5	76	(35 - 114)
2-Fluorobiphenyl	70	(43 - 116)
2,4,6-Tribromophenol	90	(10 - 123)
Terphenyl-d14	69	(33 - 141)

NOTE(S):

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching Procedure Method 1311 (55 FR 26986)

Quanterra Environmental Services

BROWN & CALDWELL

Client Sample ID: NWFT-L

TCLP GC/MS Volatiles

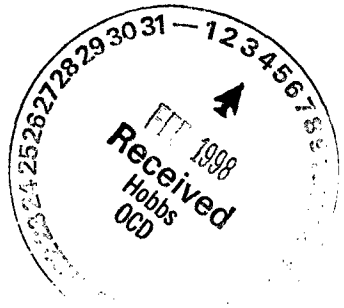
Lot-Sample #...: I7K210132-002 **Work Order #...:** CE5M4106 **Matrix.....:** WATER
Date Sampled...: 11/20/97 10:25 **Date Received..:** 11/21/97
Leach Date.....: 12/03/97 **Prep Date.....:** 12/09/97 **Analysis Date..:** 12/10/97
Leach Batch #..: P733803 **Prep Batch #...:** 7345254 **Analysis Time..:** 07:13
Dilution Factor: 1

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
Benzene	ND	0.050	mg/L	SW846 8240B
Carbon tetrachloride	ND	0.050	mg/L	SW846 8240B
Chlorobenzene	ND	0.050	mg/L	SW846 8240B
Chloroform	ND	0.050	mg/L	SW846 8240B
1,2-Dichloroethane	ND	0.050	mg/L	SW846 8240B
1,1-Dichloroethylene	ND	0.050	mg/L	SW846 8240B
Methyl ethyl ketone	ND	0.20	mg/L	SW846 8240B
Tetrachloroethylene	ND	0.050	mg/L	SW846 8240B
Trichloroethylene	ND	0.050	mg/L	SW846 8240B
Vinyl chloride	ND	0.10	mg/L	SW846 8240B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
4-Bromofluorobenzene	102	(86 - 115)
1,2-Dichloroethane-d4	96	(76 - 114)
Toluene-d8	106	(88 - 110)

NOTE(S):

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching Procedure Method 1311 (55 FR 26986)



Quanterra
Environmental Services

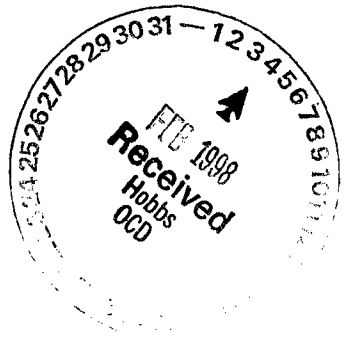
BROWN & CALDWELL

Client Sample ID: NWPT-L

General Chemistry

Lot-Sample #...: I7K210132-002 Work Order #...: CE5M4 Matrix.....: WATER
Date Sampled...: 11/20/97 10:25 Date Received..: 11/21/97

PARAMETER	RESULT	RL	UNITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
pH (liquid)	6.8	0.10	No Units	MCAWW 150.1	11/21/97	7325189
	Dilution Factor: 1					
	Analysis Time..: 16:00					
Flashpoint	>150		deg F	SW846 1010	11/26/97	7330225
	Dilution Factor: 1					
	Analysis Time..: 13:00					
Reactive Cyanide	ND	200	mg/L	SW846 7.3.3	11/25-12/01/97	7329187
	Dilution Factor: 1					
	Analysis Time..: 15:42					
Reactive Sulfide	29	3.0	mg/L	SW846 7.3.4	11/25/97	7329190
	Dilution Factor: 1					
	Analysis Time..: 00:00					



Quanterra Environmental Services

Client Sample ID: MWFT-L

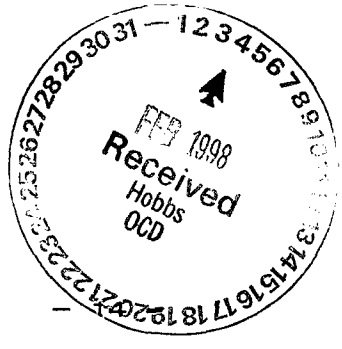
TCLP Metals

Lot-Sample #...: I7K210132-002 **Matrix.....:** WATER
Date Sampled...: 11/20/97 10:25 **Date Received..:** 11/21/97
Leach Date.....: 12/01/97 **Leach Batch #..:** P733605

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
Prep Batch #...: 7337204						
Arsenic	ND	0.50	mg/L	SW846 6010A	12/03-12/04/97	CE5M4108
		Dilution Factor: 1				
		Analysis Time..: 16:47				
Barium	ND	10.0	mg/L	SW846 6010A	12/03-12/04/97	CE5M4109
		Dilution Factor: 1				
		Analysis Time..: 16:47				
Cadmium	ND	0.10	mg/L	SW846 6010A	12/03-12/04/97	CE5M410A
		Dilution Factor: 1				
		Analysis Time..: 16:47				
Chromium	ND	0.50	mg/L	SW846 6010A	12/03-12/04/97	CE5M410C
		Dilution Factor: 1				
		Analysis Time..: 16:47				
Lead	ND	0.50	mg/L	SW846 6010A	12/03-12/04/97	CE5M410D
		Dilution Factor: 1				
		Analysis Time..: 16:47				
Selenium	ND	0.25	mg/L	SW846 6010A	12/03-12/04/97	CE5M410E
		Dilution Factor: 1				
		Analysis Time..: 16:47				
Silver	ND	0.50	mg/L	SW846 6010A	12/03-12/04/97	CE5M410F
		Dilution Factor: 1				
		Analysis Time..: 16:47				
Prep Batch #...: 7339177						
Mercury	ND	0.0020	mg/L	SW846 7470	12/05/97	CE5M4107
		Dilution Factor: 1				
		Analysis Time..: 15:38				

NOTE(S):

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching Procedure Method 1311 (55 FR 26986)



3

Chain of Custody Record

QUA-4149-1

CHAIN OF CUSTODY NUMBER

* 000598 - 001 *

FK-210132
IBA050117

Quanterra

Client	Project Manager	Date
B.J. SERVICES	TIM JENKINS	11/14/1997
Address	**Telephone Number (Area Code)/Fax Number**	**Lab Location**
2708 W. COUNTY ROAD	(713) 759-0999 / (000)	QUANTERRA - AUSTIN
City / **State** / **Zip Code**	**Site Contact**	
HOBBS / NM / 88240	TIM JENKINS	
Project Number/Name	**Carrier/Waybill Number**	
BJ SERVICES/HOBBS,NM — NOWSCO SITE	826738584O - ABX	
Contract/Purchase Order/Quote Number		
CONTRACT / PURCHASE ORDER # : BJ SERVICES/HOBBS		QUOTE: 21635

Page 1 of 1

Analysis

Sample I.D. Number and Description	Date	Time	Sample Type	Containers: Volume	Containers: Type	Containers: No.	Preservative	Condition on Receipt/Comments
HCAT-L	11/20/97	1050	SOLID LIQ	160z 60mL	CLEAR GL	6	None	
[illegible]			SOLID	120mL	CLEAR GL	4	None	(5)
NWFT-L	11/20/97	1025	SOLID LIQ	160z 60mL	CLEAR GL	6	None	
14-1-WL	11/20/97	1210	SOLID LIQ	160z 120mL	CLEAR GL	6	None	
		935	SOLID	60mL	CLEAR GL	1	None	
SB-3-20	11/19/97	1200	SOLID SOIL	4oz 60mL	CLEAR GL	1	None	
SB-3-40	11/19/97	940	SOLID SOIL	4oz 60mL	CLEAR GL	1	None	
SB-3-45	11/19/97	1000	SOLID SOIL	4oz 120mL	CLEAR GL	1	None	
SB-4-25	11/19/97		SOLID	60mL	CLEAR GL	1	None	
SB-4-40	11/19/97		SOLID	120mL	CLEAR GL	1	None	
SB-4-45	11/19/97		SOLID	60mL	CLEAR GL	1	None	
			SOLID	120mL	CLEAR GL	1	None	
WSW-1	11/20/97	1200	SOLID	60mL	CLEAR GL	1	None	(5)
			SOLID	120mL	CLEAR GL	1	None	
			SOLID	60mL	CLEAR GL	1	None	
			SOLID	120mL	CLEAR GL	1	None	

Analysis columns: PH, RCI; HOLD ALL OTHER UNTIL NOTIFIED; BTEX; HOLD

Special Instructions: BLUE ICE, CUSTODY SEALS, COC

1/8/98 - All soils requested DRO Analysis / 4 bottles - 8020 added as well

Possible Hazard Identification: ☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

Sample Disposal: ☐ Return To Client ☐ Disposal By Lab ☐ Archive For _____ Months (A fee may be assessed if samples are retained longer than 3 months)

Turn Around Time Required: ☐ Normal ☐ Rush ☐ Other _____

QC Level: ☐ I. ☐ II. ☐ III.

Project Specific Requirements (Specify)

	Date	Time		Date	Time
1. Relinquished By	11/15/97	1800	1. Received By		
2. Relinquished By	11/20/97	1600	2. Received By AIR BORNE EXPRESS	11/20/97	1600
3. Relinquished By			3. Received By	11/21/97	935

Comments

11/21/97 Delete ~~PH~~ RCI from HCAT-L, 14-1-WL / Add to NWFT-L & TCLP VIA, SV, metals (RCRA) & RCI / Add to WSW-1 & Cations, Anions, Alk-T, Total RCRA metals (PH (5310), BTEX (8020)

DISTRIBUTION: WHITE - Stays with the Sample; CANARY - Returned to Client with Report; PINK - Field Copy

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ W/Rich 2/4/98 Verbal Approval Received: Yes ☒ No ☐	4. Generator Baker Oil Tools
	5. Originating Site Hobbs facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Rowland
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 507 West County Road	Hobbs, New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

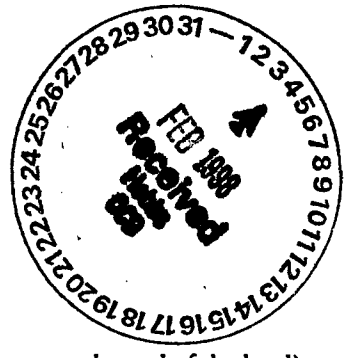
The following analytical is from the Baker Oil Tools Hobbs facility. The material was generated by steaming tools. This material has been approved in the past . I have included a certificate of waaste and a chain of custody.

Please Notify Baker Oil tools this is the Last Approval For Sample Period 2-12-98

02-001

Must Resample & Analyze Waste Stream

MJK



Mail to Hobbs 2/23/98

Estimated Volume 60 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Office Manager DATE: 02/02/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env Engr DATE: 2/19/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 2/20/98

BAKER OIL TOOLS

FAX TRANSMITTAL MEMO

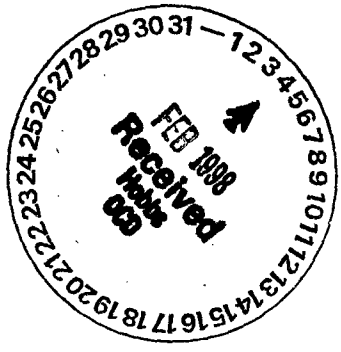
HOBBS, NEW MEXICO

Telephone: 505-397-3671 • Fax: 505-393-4213

Date:	2-9-98		
To:	Billie Charo	**From:**	Ray Dockery
Location:		**Ref:**	
Company:	CRI	**Subject:**	Sump disposal
Fax No.:	393-3615	**# pgs:(inc. this pg)**	2
Copy:			

The waste we are sending remains the same as previously tested.

Ray Dockery



CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR Baker Oil Tools

ADDRESS P O Box 1828 Hobbs, NM 88240

GENERATING SITE 507 West County Road Hobbs

COUNTY Lea **STATE** NM

TYPE OF WASTE Sump water

ESTIMATED VOLUME 60 bbls

GENERATING PROCESS Steaming tools

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY Rowland Trucking

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT Ray Dockery
SIGNATURE

NAME Ray Dockery
PRINTED

ADDRESS P O Box 1828

Hobbs, NM 88240

DATE 2-16-98

FEB 1998 Received Hobbs OCD

EPIC LABORATORIES, INC.

ANALYTICAL AND QUALITY CONTROL REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

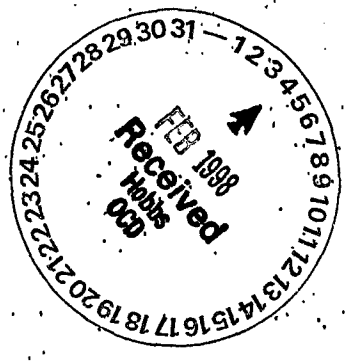
EPIC Job Number: 97.00485

Page 1

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Enclosed are the Analytical Results and Quality Control Data Reports for the following samples submitted to EPIC Laboratories, Inc. for analysis:

Sample Number	Sample Description	Date Taken	Time Taken	Date Received
328563	#1 Sample (Main)	02/12/1997	07:30	02/14/1997
328565	Sample #2 (Main)	02/12/1997	07:30	02/14/1997



This Quality Control report is generated on a batch basis: All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

Jim Rowley
Project Manager

NOTE: Results apply only to the samples analyzed. Reproduction of this report is permitted only in its entirety.

ANALYTICAL RESULTS REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485
Sample Number: 328563

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Sample Description: #1 Sample (Main)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
Cyanide, Reactive		<0.25	mg/kg	S-7.3.3.1		02/24/1997	kwo		496	0.25
pH, Corrosivity		7.39	units	S-7.2.2		02/20/1997	eql		1400	N/A
Sulfide, Reactive		30	mg/kg	S-7.3.4.1		02/24/1997	kwo		519	12.5
TCLP-Arsenic, ICP		<0.03	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1516	0.03
TCLP-Barium, ICP		0.22	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1403	0.01
TCLP-Cadmium, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1578	0.01
TCLP-Chromium, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1577	0.01
TCLP-Lead, ICP		0.12	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1586	0.05
TCLP-Mercury, CVAA	EDL	<0.02	mg/L	S-7470A		02/19/1997	bwb		1334	0.0002
TCLP-Selenium, ICP		<0.04	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1515	0.04
TCLP-Silver, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1568	0.01
Ignitability	DNB	>200		ASTM D4982-89		02/21/1997	bas		311	
TCLP-ACID EXTRACTABLES - 8270					02/20/1997					
TCLP-Cresols, Total		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Pentachlorophenol		<0.33	mg/L	S-8270A		02/24/1997	dtw	434	419	0.33
TCLP-2,4,5-Trichlorophenol		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-2,4,6-Trichlorophenol		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
SURR: 2-Fluorophenol		24	% Rec	S-8270A		02/24/1997	dtw	434	419	21-100
SURR: Phenol-d5		20	% Rec	S-8270A		02/24/1997	dtw	434	419	10-94
SURR: 2,4,6-Tribromophenol		63	% Rec	S-8270A		02/24/1997	dtw	434	419	10-123
TCLP-BASE NEUTRALS - 8270					02/20/1997					
TCLP-1,4-Dichlorobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-2,4-Dinitrotoluene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Hexachlorobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Hexachlorobutadiene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Hexachloroethane		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Nitrobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Pyridine		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
SURR: 2-Fluorobiphenyl		99	% Rec	S-8270A		02/24/1997	dtw	434	418	43-116
SURR: Nitrobenzene-d5		64	% Rec	S-8270A		02/24/1997	dtw	434	418	35-114
SURR: Terphenyl-d14		98	% Rec	S-8270A		02/24/1997	dtw	434	418	33-141

DNB - Does not burn.
EDL - Elevated Detection Limit due to matrix interference.

ANALYTICAL RESULTS REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485
Sample Number: 328563

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Sample Description: #1 Sample (Main)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
TCLP-8240										
TCLP-Benzene		0.055	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-2-Butanone (MEK)		<0.50	mg/L	S-8240A		02/27/1997	acg		1173	0.50
TCLP-Carbon tetrachloride		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Chlorobenzene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Chloroform		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-1,2-Dichloroethane		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-1,1-Dichloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Tetrachloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Trichloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Vinyl chloride		<0.05	mg/L	S-8240A		02/27/1997	acg		1173	0.05
SURR: 1,2-Dichloroethane-d4		107	% Rec	S-8240A		02/27/1997	acg		1173	76-114
SURR: Toluene-d8		109	% Rec	S-8240A		02/27/1997	acg		1173	88-110
SURR: 4-Bromofluorobenzene		105	% Rec	S-8240A		02/27/1997	acg		1173	86-115

ANALYTICAL RESULTS REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485
Sample Number: 328565

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Sample Description: Sample #2 (Main)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
Cyanide, Reactive		<0.25	mg/kg	S-7.3.3.1		02/24/1997	kwo		496	0.25
pH, Corrosivity		7.61	units	S-7.2.2		02/20/1997	cgl		1400	N/A
Sulfide, Reactive		<12.5	mg/kg	S-7.3.4.1		02/24/1997	kwo		519	12.5
TCLP-Arsenic, ICP		<0.03	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1516	0.03
TCLP-Barium, ICP		0.20	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1403	0.01
TCLP-Cadmium, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1578	0.01
TCLP-Chromium, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1677	0.01
TCLP-Lead, ICP		0.1	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1586	0.03
TCLP-Mercury, CVAA	EDL	<0.02	mg/L	S-7470A		02/19/1997	bwh		1334	0.0002
TCLP-Selenium, ICP		<0.04	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1515	0.04
TCLP-Silver, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1566	0.01
Ignitability	DNB	>200		ASTM D4982-89		02/21/1997	bsa		311	
TCLP-ACID EXTRACTABLES - 8270					02/20/1997					
TCLP-Cresols, Total		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Pentachlorophenol		<0.33	mg/L	S-8270A		02/24/1997	dtw	434	419	0.33
TCLP-2,4,5-Trichlorophenol		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-2,4,6-Trichlorophenol		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
SURR: 2-Fluorophenol		93	% Rec	S-8270A		02/24/1997	dtw	434	419	21-100
SURR: Phenol-d5		76	% Rec	S-8270A		02/24/1997	dtw	434	419	10-94
SURR: 2,4,6-Tribromophenol		119	% Rec	S-8270A		02/24/1997	dtw	434	419	10-123
TCLP-BASE NEUTRALS - 8270					02/20/1997					
TCLP-1,4-Dichlorobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-2,4-Dinitrotoluene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Hexachlorobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Hexachlorobutadiene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Hexachloroethane		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Nitrobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Pyridine		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
SURR: 2-Fluorobiphenyl		105	% Rec	S-8270A		02/24/1997	dtw	434	418	43-116
SURR: Nitrobenzene-d5		99	% Rec	S-8270A		02/24/1997	dtw	434	418	35-114
SURR: Terphenyl-d14		76	% Rec	S-8270A		02/24/1997	dtw	434	418	33-141

DNB - Does not burn.
EDL - Elevated Detection Limit due to matrix interference.

ANALYTICAL RESULTS REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485
Sample Number: 328565

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Sample Description: Sample #2 (Main)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
TCLP-8240										
TCLP-Benzene		0.039	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-2-Butanone (MEK)		<0.50	mg/L	S-8240A		02/27/1997	acg		1173	0.50
TCLP-Carbon Tetrachloride		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Chlorobenzene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Chloroform		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-1,2-Dichloroethane		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-1,1-Dichloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Tetrachloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Trichloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Vinyl chloride		<0.05	mg/L	S-8240A		02/27/1997	acg		1173	0.05
SURR: 1,2-Dichloroethane-d4		106	% Rec	S-8240A		02/27/1997	acg		1173	76-114
SURR: Toluene-d8		109	% Rec	S-8240A		02/27/1997	acg		1173	88-110
SURR: 4-Bromofluorobenzene		105	% Rec	S-8240A		02/27/1997	acg		1173	86-115

QUALITY CONTROL REPORT
BLANKS

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Blank Result	Units	Reporting Limit	Date Analyzed	Prep Batch Number	Run Batch Number
Cyanide, Reactive		<0.25	mg/kg	0.25	02/26/1997		496
Sulfide, Reactive		<12.5	mg/kg	12.5	02/24/1997		519
TCLP-Arsenic, ICP		<0.03	mg/L	0.03	02/19/1997	1200	1516
TCLP-Barium, ICP		<0.01	mg/L	0.01	02/19/1997	1200	1403
TCLP-Cadmium, ICP		<0.01	mg/L	0.01	02/19/1997	1200	1578
TCLP-Chromium, ICP		<0.01	mg/L	0.01	02/19/1997	1200	1577
TCLP-Lead, ICP		<0.03	mg/L	0.03	02/19/1997	1200	1586
TCLP-Mercury, CVAA		<0.0002	mg/L	0.0002	02/19/1997		1134
TCLP-Selenium, ICP		<0.04	mg/L	0.04	02/19/1997	1200	1515
TCLP-Silver, ICP		<0.01	mg/L	0.01	02/19/1997	1200	1668
TCLP-ACID EXTRACTABLES - 8270							
TCLP-Cresols, Total		<0.066	mg/L	0.066	02/24/1997	434	419
TCLP-Pentachlorophenol		<0.33	mg/L	0.33	02/24/1997	434	419
TCLP-2,4,5-Trichlorophenol		<0.066	mg/L	0.066	02/24/1997	434	419
TCLP-2,4,6-Trichlorophenol		<0.066	mg/L	0.066	02/24/1997	434	419
TCLP-BASE NEUTRALS - 8270							
TCLP-1,4-Dichlorobenzene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-2,4-Dinitrotoluene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Hexachlorobenzene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Hexachlorobutadiene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Hexachloroethane		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Nitrobenzene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Pyridine		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-8260							
TCLP-Benzene		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-2-Butanone (MEK)		<0.50	mg/L	0.50	02/27/1997		1173
TCLP-Carbon Tetrachloride		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-Chlorobenzene		<0.025	mg/L	0.025	02/27/1997		1173

All parameters should be less than the reporting limit.

QUALITY CONTROL REPORT
BLANKS

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Blank Result	Units	Reporting Limit	Date Analyzed	Prep Batch Number	Run Batch Number
TCLP-Chloroform		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-1,2-Dichloroethane		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-1,1-Dichloroethene		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-Tetrachloroethene		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-Trichloroethene		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-Vinyl chloride		<0.05	mg/L	0.05	02/27/1997		1173

All parameters should be less than the reporting limit.

QUALITY CONTROL REPORT
CONTINUING CALIBRATION VERIFICATION STANDARD

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	CCVS True Concentration	Units	CCVS Concentration Found	CCVS Percent Recovery	Date Analyzed	Run Batch Number
Cyanide, Reactive		1.0	mg/kg	1.0	100.0	02/24/1997	496
Sulfide, Reactive		1000	mg/kg	1000	100.0	02/24/1997	519
TCLP-Arsenic, ICP		1.00	mg/L	1.10	110.0	02/19/1997	1516
TCLP-Arsenic, ICP		1.00	mg/L	1.10	110.0	02/19/1997	1516
TCLP-Barium, ICP		1.00	mg/L	0.99	99.0	02/19/1997	1403
TCLP-Barium, ICP		1.00	mg/L	0.99	99.0	02/19/1997	1403
TCLP-Cadmium, ICP		1.00	mg/L	1.02	102.0	02/19/1997	1578
TCLP-Cadmium, ICP		1.00	mg/L	1.02	102.0	02/19/1997	1578
TCLP-Chromium, ICP		1.00	mg/L	1.01	101.0	02/19/1997	1577
TCLP-Chromium, ICP		1.00	mg/L	1.01	101.0	02/19/1997	1577
TCLP-Lead, ICP		1.00	mg/L	1.00	100.0	02/19/1997	1586
TCLP-Lead, ICP		1.00	mg/L	1.00	100.0	02/19/1997	1586
TCLP-Mercury, CVAA		0.50	mg/L	0.52	104.0	02/19/1997	1234
TCLP-Selenium, ICP		1.00	mg/L	1.04	104.0	02/19/1997	1515
TCLP-Selenium, ICP		1.00	mg/L	1.04	104.0	02/19/1997	1515
TCLP-Silver, ICP		1.00	mg/L	0.98	98.0	02/19/1997	1568
TCLP-Silver, ICP		1.00	mg/L	0.98	98.0	02/19/1997	1568
TCLP-ACID EXTRACTABLES - 8270							
TCLP-Cresols, Total		0.10	mg/L	0.079	79.0	02/24/1997	419
TCLP-Pentachlorophenol		0.050	mg/L	0.057	114.0	02/24/1997	419
TCLP-2,4,5-Trichlorophenol		0.050	mg/L	0.045	90.0	02/24/1997	419
TCLP-2,4,6-Trichlorophenol		0.050	mg/L	0.045	90.0	02/24/1997	419
TCLP-BASE NEUTRALS - 8270							
TCLP-1,4-Dichlorobenzene		0.050	mg/L	0.040	80.0	02/24/1997	418
TCLP-2,4-Dinitrotoluene		0.050	mg/L	0.044	88.0	02/24/1997	418
TCLP-Hexachlorobenzene		0.050	mg/L	0.055	110.0	02/24/1997	418
TCLP-Hexachlorobutadiene		0.050	mg/L	0.049	98.0	02/24/1997	418
TCLP-Hexachloroethane		0.050	mg/L	0.039	78.0	02/24/1997	418

CCVS - Continuing Calibration Verification Standard

QUALITY CONTROL REPORT
CONTINUING CALIBRATION VERIFICATION STANDARD

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	CCVS True Concentration	Units	CCVS Concentration Found	CCVS Percent Recovery	Date Analyzed	Run Batch Number
TCLP-Nitrobenzene		0.050	mg/L	0.040	80.0	02/24/1997	418
TCLP-Pyridine		0.050	mg/L	0.042	84.0	02/24/1997	418
TCLP-8240							
TCLP-Benzene		0.020	mg/L	0.023	115.0	02/27/1997	1173
TCLP-2-Butanone (MEK)		0.020	mg/L	0.023	115.0	02/27/1997	1173
TCLP-Carbon Tetrachloride		0.020	mg/L	0.019	95.0	02/27/1997	1173
TCLP-Chlorobenzene		0.020	mg/L	0.021	105.0	02/27/1997	1173
TCLP-Chloroform		0.020	mg/L	0.022	110.0	02/27/1997	1173
TCLP-1,2-Dichloroethane		0.020	mg/L	0.022	110.0	02/27/1997	1173
TCLP-1,1-Dichloroethene		0.020	mg/L	0.020	100.0	02/27/1997	1173
TCLP-Tetrachloroethene		0.020	mg/L	0.023	115.0	02/27/1997	1173
TCLP-Trichloroethene		0.020	mg/L	0.022	110.0	02/27/1997	1173
TCLP-Vinyl chloride		0.020	mg/L	0.018	90.0	02/27/1997	1173

CCVS - Continuing Calibration Verification Standard.

QUALITY CONTROL REPORT
MATRIX SPIKE/MATRIX SPIKE DUPLICATE

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Units	Sample Result	Spike Amount Added	Matrix Spike Result	MS Percent Recovery	Duplicate Spike Amount Added	MSD Result	MSD Percent Recovery	MS/MSD RPD	Date Analyzed	Prep Batch Number	Run Batch Number
TCLP-Arsenic, ICP		mg/L	<0.03	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/18/1997		1516
TCLP-Arsenic, ICP		mg/L	<0.03	1.00	1.03	103.0	1.00	1.00	100.0	4.7	02/19/1997	1200	1516
TCLP-Barium, ICP		mg/L	<0.01	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/18/1997		1403
TCLP-Barium, ICP		mg/L	0.57	1.00	1.41	84.0	1.00	1.51	94.0	11.2	02/19/1997	1200	1403
TCLP-Cadmium, ICP		mg/L	<0.01	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1578
TCLP-Cadmium, ICP		mg/L	<0.01	1.00	0.92	92.0	1.00	0.98	98.0	6.3	02/19/1997	1200	1578
TCLP-Chromium, ICP		mg/L	<0.01	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1577
TCLP-Chromium, ICP		mg/L	0.04	1.00	0.95	91.0	1.00	1.03	99.0	8.4	02/19/1997	1200	1577
TCLP-Lead, ICP		mg/L	<0.03	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1566
TCLP-Lead, ICP		mg/L	0.42	1.00	1.30	88.0	1.00	1.38	96.0	8.7	02/19/1997	1200	1566
TCLP-Mercury, CVAA		mg/L	0.0002	0.50	0.50	100.0	0.50	0.50	100.0	0.0	02/19/1997		1334
TCLP-Selenium, ICP		mg/L	<0.04	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/18/1997		1515
TCLP-Selenium, ICP		mg/L	<0.04	1.00	1.05	105.0	1.00	1.14	114.0	8.2	02/19/1997	1200	1515
TCLP-Silver, ICP		mg/L	<0.01	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1568
TCLP-Silver, ICP		mg/L	<0.01	1.00	0.88	88.0	1.00	0.93	93.0	5.5	02/19/1997	1200	1568
TCLP-ACID EXTRACTABLES - 8270													
TCLP-Cresols, Total		mg/L	<0.066	0.30	0.109	36.3	0.30	0.111	37.0	1.9	02/24/1997	434	419
TCLP-Pentachlorophenol		mg/L	<0.33	0.10	0.043	43.0	0.10	0.049	49.0	13.0	02/24/1997	434	419
TCLP-2,4,5-Trichlorophenol		mg/L	<0.066	0.10	0.044	44.0	0.10	0.048	48.0	8.7	02/24/1997	434	419
TCLP-2,4,6-Trichlorophenol		mg/L	<0.066	0.10	0.046	46.0	0.10	0.041	41.0	15.7	02/24/1997	434	419
TCLP-BASE NEUTRALS - 8270													
TCLP-1,4-Dichlorobenzene		mg/L	<0.066	0.10	0.040	40.0	0.10	0.042	42.0	4.9	02/24/1997	434	416
TCLP-2,4-Dinitrotoluene		mg/L	<0.066	0.10	0.043	43.0	0.10	0.044	44.0	2.3	02/24/1997	434	416
TCLP-Hexachlorobenzene		mg/L	<0.066	0.10	0.044	44.0	0.10	0.050	50.0	12.8	02/24/1997	434	416
TCLP-Hexachlorobutadiene		mg/L	<0.066	0.10	0.046	46.0	0.10	0.048	48.0	6.5	02/24/1997	434	416

NOTE: The Quality Control data in this report reflects the batch in which your sample was prepped and/or analyzed. The sample selected for QA may not necessarily be your sample.

QUALITY CONTROL REPORT
MATRIX SPIKE/MATRIX SPIKE DUPLICATE

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Units	Sample Result	Spike Amount Added	Matrix Spike Result	MS Percent Recovery	Duplicate Spike Amount Added	MSD Result	MSD Percent Recovery	MS/MSD RPD	Date Analyzed	Prep Batch Number	Run Batch Number
TCLP-Hexachloroethane		mg/L	<0.066	0.20	0.048	48.0	0.10	0.045	45.0	2.1	02/26/1997	434	418
TCLP-Nitrobenzene		mg/L	<0.066	0.10	0.046	46.0	0.10	0.047	47.0	2.2	02/26/1997	434	418
TCLP-Pyridine		mg/L	<0.066	0.10	0.060	60.0	0.10	0.062	62.0	3.3	02/26/1997	434	418
TCLP-8260													
TCLP-Benzene		mg/L	<0.025	0.020	0.025	125.0	0.020	0.026	125.0	0.0	02/27/1997		1173
TCLP-2-Butanone (MEK)		mg/L	<0.50	0.020	0.019	95.0	0.020	0.018	90.0	5.4	02/27/1997		1173
TCLP-Carbon Tetrachloride		mg/L	<0.025	0.020	0.020	100.0	0.020	0.019	95.0	5.0	02/27/1997		1173
TCLP-Chlorobenzene		mg/L	<0.025	0.020	0.023	115.0	0.020	0.023	115.0	0.0	02/27/1997		1173
TCLP-Chloroform		mg/L	<0.025	0.020	0.024	120.0	0.020	0.023	115.0	4.3	02/27/1997		1173
TCLP-1,2-Dichloroethane		mg/L	<0.025	0.020	0.022	110.0	0.020	0.022	110.0	0.0	02/27/1997		1173
TCLP-1,1-Dichloroethene		mg/L	<0.025	0.020	0.021	105.0	0.020	0.021	105.0	0.0	02/27/1997		1173
TCLP-Tetrachloroethene		mg/L	<0.025	0.020	0.024	120.0	0.020	0.021	105.0	13.3	02/27/1997		1173
TCLP-Trichloroethene		mg/L	<0.025	0.020	0.022	110.0	0.020	0.022	110.0	0.0	02/27/1997		1173
TCLP-Vinyl chloride		mg/L	<0.05	0.020	0.017	85.0	0.020	0.015	75.0	12.5	02/27/1997		1173

NOTE: The Quality Control data in this report reflects the batch in which your sample was prepped and/or analyzed. The sample selected for QA may not necessarily be your sample.

QUALITY CONTROL REPORT
DUPLICATES

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Units	Sample Result	Duplicate Sample Result	RPD	Date Analyzed	Prep Batch Number	Run Batch Number
pH, Corrosivity		units	7.24	7.31	0.4	02/20/1997		1400

QUALITY CONTROL REPORT
LABORATORY CONTROL STANDARD

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Analyte	Prep Batch No.	Run Batch No.	LCS True Conc	Units	LCS Conc Found	LCS % Rec.	LCS Dup Conc. Found	LCS Dup % Rec	LCS % RPD	Flag	Date Analyzed
Cyanide, Reactive		496	1000	mg/kg	379	37.9					02/24/1997
pH, Corrosivity		1400	9.18	units	8.94	97.4					02/20/1997
Sulfide, Reactive		519	1000	mg/kg	960	96.0					02/24/1997
TCLP-Arsenic, ICP	1200	1516	1.00	mg/L	1.05	105.0					02/18/1997
TCLP-Barium, ICP	1200	1403	1.00	mg/L	1.00	100.0					02/19/1997
TCLP-Cadmium, ICP	1200	1578	1.00	mg/L	0.99	99.0					02/19/1997
TCLP-Chromium, ICP	1200	1577	1.00	mg/L	0.99	99.0					02/19/1997
TCLP-Lead, ICP	1200	1586	1.00	mg/L	0.98	98.0					02/19/1997
TCLP-Mercury, CVAA		1334	0.50	mg/L	0.57	114.0					02/19/1997
TCLP-Selenium, ICP	1200	1515	1.00	mg/L	0.97	97.0					02/19/1997
TCLP-Silver, ICP	1200	1568	1.00	mg/L	0.91	91.0					02/19/1997
TCLP-ACID EXTRACTABLES - 8270											
TCLP-Cresols, Total	434	419	0.20	mg/L	0.137	68.7					02/24/1997
TCLP-Pentachlorophenol	434	419	0.10	mg/L	0.038	38.0					02/24/1997
TCLP-2,4,6-Trichlorophenol	434	419	0.10	mg/L	0.047	47.0					02/24/1997
TCLP-2,4,6-Trichlorophenol	434	419	0.10	mg/L	0.057	57.0					02/24/1997
TCLP-BASE NEUTRALS - 8270											
TCLP-1,4-Dichlorobenzene	434	418	0.10	mg/L	0.045	45.0					02/24/1997
TCLP-2,4-Dinitrotoluene	434	418	0.10	mg/L	0.056	56.0					02/24/1997
TCLP-Hexachlorobenzene	434	418	0.10	mg/L	0.050	50.0					02/24/1997
TCLP-Hexachlorobutadiene	434	418	0.10	mg/L	0.038	38.0					02/24/1997
TCLP-Hexachloroethane	434	418	0.10	mg/L	0.046	46.0					02/24/1997
TCLP-Nitrobenzene	434	418	0.10	mg/L	0.058	58.0					02/24/1997
TCLP-Pyridine	434	418	0.10	mg/L	0.061	61.0					02/24/1997
TCLP-8240											
TCLP-Benzene		1173	0.020	mg/L	0.023	115.0					02/27/1997
TCLP-2-Butanone (MEK)		1173	0.020	mg/L	0.025	125.0					02/27/1997
TCLP-Carbon Tetrachloride		1173	0.020	mg/L	0.020	100.0					02/27/1997
TCLP-Chlorobenzene		1173	0.020	mg/L	0.023	115.0					02/27/1997
TCLP-Chloroform		1173	0.020	mg/L	0.022	110.0					02/27/1997
TCLP-1,2-Dichloroethane		1173	0.020	mg/L	0.021	105.0					02/27/1997

LCS - Laboratory Control Standard

For samples with insufficient sample volume, an LCS/LCS duplicate is reported instead of an MS/MSD.

QUALITY CONTROL REPORT
LABORATORY CONTROL STANDARD

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Analyte	Prep Batch No.	Run Batch No.	LCS True Conc	Units	LCS Conc Found	LCS % Rec.	LCS Dup Conc. Found	LCS Dup % Rec	LCS % RPD	Flag	Date Analyzed
TCLP-1,1-Dichloroethene		1173	0.020	mg/L	0.021	105.0					02/27/1997
TCLP-Tetrachloroethene		1173	0.020	mg/L	0.027	135.0					02/27/1997
TCLP-Trichloroethene		1173	0.020	mg/L	0.023	115.0					02/27/1997
TCLP-Vinyl chloride		1173	0.020	mg/L	0.018	90.0					02/27/1997

LCS - Laboratory Control Standard

For samples with insufficient sample volume, an LCS/LCS duplicate is reported instead of an MS/MSD.

SPIKES

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Date Analyzed	Units	Prep Batch Number	Run Batch Number	Spiked Sample Result	Sample Result	Spike Amount	Percent Recovery
Cyanide, Reactive		02/24/1997	mg/kg		496	298	<0.25	1000	29.8
Sulfide, Reactive		02/24/1997	mg/kg		519	240	<12.5	250	96.0

Advisory Control Limits for Percent Recovery are 85-115%

CHAIN OF CUSTODY RECORD

EPIC LABORATORIES, INC.
1548 VALWOOD PARKWAY, SUITE 118
CARROLLTON, TEXAS 75006
DALLAS (972) 406-6103
AUSTIN (512) 928-8805

COMPANY: Basin Oil Tools — NOBBS HWY 88240
ADDRESS: 507 WEST County Road - Hobbs NM
PHONE: 505-397-3671 FAX: 505-393-4213
PROJECT NAME/LOCATION: Hobbs Sump
PROJECT NUMBER:
PROJECT MANAGER:

REPORT TO: Ray Dockery
INVOICE TO: Kay Dockery
P.O. NO.:
EPIC QUOTE NO.:

SAMPLED BY (PRINT NAME): Dennis Collins Jr
(PRINT NAME): B.W. Russell
SIGNATURE:
SIGNATURE: Bill Russell

	TIME	SAMPLE ID/DESCRIPTION	MATRIX	GRAB	COMP	# and Type of Containers: HCl	HNO3	H2SO4	NaOH	OTHER	TCLP-metals	TCLP semi-vols	TCLP-volatiles	BTX
2/11/97	0730	#1 - Sump (Main)	WL		X					1	✓	✓	✓	✓
2/11/97	0730	#2 - Sump (Main)	WL		X					1	✓	✓	✓	✓

To assist us in selecting the proper method:
Is this work being conducted for regulatory compliance monitoring? Yes ✓ No ___
Is this work being conducted for regulatory enforcement action? Yes ___ No ✓
Which regulations apply: RCRA ___ NPDES Wastewater ___ UST ___ Drinking Water ___ Other ___ None ___

COMMENTS

CONDITION OF SAMPLE: BOTTLES INTACT? YES / NO — COC SEALS PRESENT AND INTACT? YES / NO
FIELD FILTERED? YES / NO — VOLATILES FREE OF HEADSPACE? YES / NO
TEMPERATURE UPON RECEIPT: 4°C
Bottles supplied by EPIC? YES / NO

SAMPLE REMAINDER DISPOSAL: RETURN SAMPLE REMAINDER TO CLIENT VIA ___
I REQUEST EPIC TO DISPOSE OF ALL SAMPLE REMAINDERS ✓ DATE ___

RELINQUISHED BY:	DATE	TIME	RECEIVED BY:	RELINQUISHED BY:	DATE	TIME	RECEIVED FOR EPIC BY:
					2/14/97	1040	Charlene Walker

METHOD OF SHIPMENT: FED EX -

REMARKS: Sump was shared with the one 30 min. Sample was taken 1 foot from bottom with a trip sampler.

PT1 - ORIGINAL - WHITE PT2 - EPIC PROJECT MANAGER - YELLOW PT3 - CUSTOMER COPY - PINK

EPIC LABS INC 2/28/97 15:04 (972) 406 6103 P.017/017

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

RECEIVED
FEB 20 1998
Environmental Bureau
Oil Conservation Division

Form C-1
Originated 8/

Submit Orig
Plus 1 C
to appropr
District O

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ W Price 2/9/98 Verbal Approval Received: Yes ☒ No ☐	4. Generator Baker Oil Tools
	5. Originating Site Hobbs facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Rowland
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 507 West County Road	Hobbs, New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

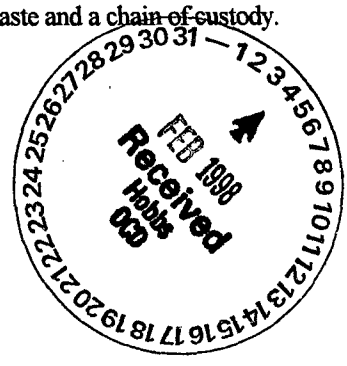
All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Baker Oil Tools Hobbs facility. The material was generated by steaming tools. This material has been approved in the past . I have included a certificate of waaste and a chain of custody.

Please notify Baker oil tools
Must Resample & Analyze this waste Stream.
The Analysis is a year old!
MJK

02-002



Emailed to Hobbs 2/25/98

Estimated Volume 60 bbls cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Office Manager DATE: 02/02/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Env Engr DATE: 2/4/98

APPROVED BY: _____ TITLE: Env Geologist DATE: 2/20/98

BAKER OIL TOOLS

FAX TRANSMITTAL MEMO

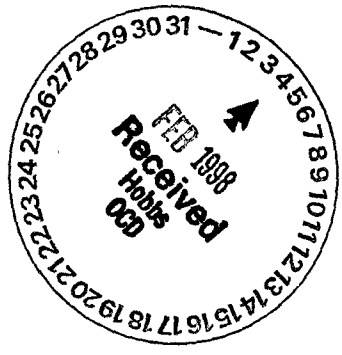
HOBBS, NEW MEXICO

Telephone: 505-397-3671 • Fax: 505-393-4213

Date:	2-16-98		
To:	Billie Charo	**From:**	Ray Dockery
Location:		**Ref:**	
Company:	CRI	**Subject:**	Sump disposal
Fax No.:	393-3615	**# pgs:(inc. this pg)**	2
Copy:			

The waste we are sending remains the same as previously tested.

Ray Dockery



CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL
"AS REQUIRED BY NEW MEXICO OIL CONSERVATION DIVISION"

COMPANY/GENERATOR Baker Oil Tools

ADDRESS P O Box 1828 Hobbs, NM 88240

GENERATING SITE 507 West County Road Hobbs

COUNTY Lea **STATE** NM

TYPE OF WASTE Sump water

ESTIMATED VOLUME 60 bbls

GENERATING PROCESS steaming tools

REMARKS

NMOCD FACILITY CONTROLLED RECOVERY INC.

TRUCKING COMPANY Rowland Trucking

As a condition of acceptance for disposal, I hearby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 2613.

AGENT Ray Dockery
SIGNATURE

NAME Ray Dockery
PRINTED

ADDRESS P O Box 1828

Hobbs, NM 88240

DATE 2-9-98

FEB 1998 Received Hobbs OCD

EPIC LABORATORIES, INC.

ANALYTICAL AND QUALITY CONTROL REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Page 1

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Enclosed are the Analytical Results and Quality Control Data Reports for the following samples submitted to EPIC Laboratories, Inc. for analysis:

Sample Number	Sample Description	Date Taken	Time Taken	Date Received
328563	#1 Sample (Main)	02/12/1997	07:30	02/14/1997
328565	Sample #2 (Main)	02/12/1997	07:30	02/14/1997

This Quality Control report is generated on a batch basis: All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

Cathy Cuney for

Jim Rowley
Project Manager

NOTE: Results apply only to the samples analyzed. Reproduction of this report is permitted only in its entirety.

ANALYTICAL RESULTS REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97-00485
Sample Number: 328563

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Sample Description: #1 Sample (Main)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
Cyanide, Reactive		<0.25	mg/kg	S-7.3.3.1		02/24/1997	kwo		496	0.25
pH, Corrosivity		7.39	units	S-7.2.2		02/20/1997	cgl		1400	N/A
Sulfide, Reactive		30	mg/kg	S-7.3.4.1		02/24/1997	kwo		510	12.5
TCLP-Arsenic, ICP		<0.03	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1516	0.03
TCLP-Barium, ICP		0.22	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1403	0.01
TCLP-Cadmium, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1578	0.01
TCLP-Chromium, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1577	0.01
TCLP-Lead, ICP		0.12	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1586	0.05
TCLP-Mercury, CVAA	EDL	<0.02	mg/L	S-7470A		02/19/1997	bwb		1334	0.0002
TCLP-Selenium, ICP		<0.04	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1515	0.04
TCLP-Silver, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1566	0.01
Ignitability	DNB	>200		ASTM D4982-89		02/21/1997	bsg		311	
TCLP-ACID EXTRACTABLES - 8270					02/20/1997					
TCLP-Cresols, Total		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Pentachlorophenol		<0.33	mg/L	S-8270A		02/24/1997	dtw	434	419	0.33
TCLP-2,4,5-Trichlorophenol		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-2,4,6-Trichlorophenol		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
SURR: 2-Fluorophenol		24	% Rec	S-8270A		02/24/1997	dtw	434	419	21-100
SURR: Phenol-d5		20	% Rec	S-8270A		02/24/1997	dtw	434	419	10-94
SURR: 2,4,6-Tribromophenol		61	% Rec	S-8270A		02/24/1997	dtw	434	419	10-123
TCLP-BASE NEUTRALS - 8270					02/20/1997					
TCLP-1,4-Dichlorobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-2,4-Dinitrotoluene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Hexachlorobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Hexachlorobutadiene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Hexachloroethane		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Nitrobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Pyridine		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
SURR: 2-Fluorobiphenyl		99	% Rec	S-8270A		02/24/1997	dtw	434	419	43-116
SURR: Nitrobenzene-d5		64	% Rec	S-8270A		02/24/1997	dtw	434	419	35-114
SURR: Terphenyl-d14		98	% Rec	S-8270A		02/24/1997	dtw	434	419	33-141

DNB - Does not burn.
EDL - Elevated Detection Limit due to matrix interference.

ANALYTICAL RESULTS REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485
Sample Number: 328563

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Sample Description: #1 Sample (Main)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
TCLP-8240										
TCLP-Benzene		0.055	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-2-Butanone (MEK)		<0.50	mg/L	S-8240A		02/27/1997	acg		1173	0.50
TCLP-Carbon Tetrachloride		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Chlorobenzene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Chloroform		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-1,2-Dichloroethane		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-1,1-Dichloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Tetrachloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Trichloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Vinyl chloride		<0.05	mg/L	S-8240A		02/27/1997	acg		1173	0.05
SURR: 1,2-Dichloroethane-d4		107	% Rec	S-8240A		02/27/1997	acg		1173	76-114
SURR: Toluene-d8		109	% Rec	S-8240A		02/27/1997	acg		1173	88-110
SURR: 4-Bromofluorobenzene		105	% Rec	S-8240A		02/27/1997	acg		1173	86-115

ANALYTICAL RESULTS REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485
Sample Number: 328565

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Sample Description: Sample #2 (Main)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
Cyanide, Reactive		<0.25	mg/kg	S-7.3.3.2		02/24/1997	kwo		496	0.25
pH, Corrosivity		7.61	units	S-7.2.2		02/20/1997	cgl		1400	N/A
Sulfide, Reactive		<12.5	mg/kg	S-7.3.4.2		02/24/1997	kwo		519	12.5
TCLP-Arsenic, ICP		<0.03	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1516	0.03
TCLP-Barium, ICP		0.20	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1403	0.01
TCLP-Cadmium, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1576	0.01
TCLP-Chromium, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1677	0.01
TCLP-Lead, ICP		0.1	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1586	0.01
TCLP-Mercury, CVAA	EDL	<0.02	mg/L	S-7470A		02/19/1997	bwh		1534	0.0002
TCLP-Selenium, ICP		<0.04	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1515	0.04
TCLP-Silver, ICP		<0.01	mg/L	S-6010A	02/19/1997	02/19/1997	jmc	1200	1568	0.01
Ignitability	DNB	>200		ASTM D4982-89		02/21/1997	bss		311	
TCLP-ACID EXTRACTABLES - 8270					02/20/1997					
TCLP-Cresols, Total		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-Pentachlorophenol		<0.33	mg/L	S-8270A		02/24/1997	dtw	434	419	0.33
TCLP-2,4,5-Trichlorophenol		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
TCLP-2,4,6-Trichlorophenol		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	419	0.066
SURR: 2-Fluorophenol		93	% Rec	S-8270A		02/24/1997	dtw	434	419	21-100
SURR: Phenol-d5		76	% Rec	S-8270A		02/24/1997	dtw	434	419	10-94
SURR: 2,4,6-Tribromophenol		119	% Rec	S-8270A		02/24/1997	dtw	434	419	10-123
TCLP-BASE NEUTRALS - 8270					02/28/1997					
TCLP-1,4-Dichlorobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-2,4-Dinitrotoluene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Hexachlorobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Hexachlorobutadiene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Hexachloroethane		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Nitrobenzene		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
TCLP-Pyridine		<0.066	mg/L	S-8270A		02/24/1997	dtw	434	418	0.066
SURR: 2-Fluorobiphenyl		105	% Rec	S-8270A		02/24/1997	dtw	434	418	43-116
SURR: Nitrobenzene-d5		99	% Rec	S-8270A		02/24/1997	dtw	434	418	35-114
SURR: Terphenyl-d14		76	% Rec	S-8270A		02/24/1997	dtw	434	418	33-141

DNB - Does not burn.
EDL - Elevated Detection Limit due to matrix interference.

ANALYTICAL RESULTS REPORT

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485
Sample Number: 328565

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Sample Description: Sample #2 (Main)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
TCLP-8240										
TCLP-Benzene		0.059	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-2-Butanone (MEK)		<0.50	mg/L	S-8240A		02/27/1997	acg		1173	0.50
TCLP-Carbon Tetrachloride		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Chlorobenzene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Chloroform		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-1,2-Dichloroethane		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-1,1-Dichloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Tetrachloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Trichloroethene		<0.025	mg/L	S-8240A		02/27/1997	acg		1173	0.025
TCLP-Vinyl chloride		<0.05	mg/L	S-8240A		02/27/1997	acg		1173	0.05
SURR: 1,2-Dichloroethane-d4		106	% Rec	S-8240A		02/27/1997	acg		1173	76-114
SURR: Toluene-d8		109	% Rec	S-8240A		02/27/1997	acg		1173	88-110
SURR: 4-Bromofluorobenzene		108	% Rec	S-8240A		02/27/1997	acg		1173	86-115

QUALITY CONTROL REPORT
BLANKS

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Blank Result	Units	Reporting Limit	Date Analyzed	Prep Batch Number	Run Batch Number
Cyanide, Reactive		<0.25	mg/kg	0.25	02/26/1997		496
Sulfide, Reactive		<12.5	mg/kg	12.5	02/26/1997		519
TCLP-Arsenic, ICP		<0.03	mg/L	0.03	02/19/1997	1200	1516
TCLP-Barium, ICP		<0.01	mg/L	0.01	02/19/1997	1200	1403
TCLP-Cadmium, ICP		<0.01	mg/L	0.01	02/19/1997	1200	1578
TCLP-Chromium, ICP		<0.01	mg/L	0.01	02/19/1997	1200	1577
TCLP-Lead, ICP		<0.03	mg/L	0.03	02/19/1997	1200	1586
TCLP-Mercury, CVAA		<0.0002	mg/L	0.0002	02/19/1997		1134
TCLP-Selenium, ICP		<0.04	mg/L	0.04	02/19/1997	1200	1515
TCLP-Silver, ICP		<0.01	mg/L	0.01	02/19/1997	1200	1669
TCLP-ACID EXTRACTABLES - 8270							
TCLP-Cresols, Total		<0.066	mg/L	0.066	02/24/1997	434	419
TCLP-Pentachlorophenol		<0.33	mg/L	0.33	02/24/1997	434	419
TCLP-2,4,5-Trichlorophenol		<0.066	mg/L	0.066	02/24/1997	434	419
TCLP-2,4,6-Trichlorophenol		<0.066	mg/L	0.066	02/24/1997	434	419
TCLP-BASE NEUTRALS - 8270							
TCLP-1,4-Dichlorobenzene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-2,4-Dinitrotoluene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Hexachlorobenzene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Hexachlorobutadiene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Hexachloroethane		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Nitrobenzene		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-Pyridine		<0.066	mg/L	0.066	02/24/1997	434	418
TCLP-8260							
TCLP-Benzene		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-2-Butanone (MEK)		<0.50	mg/L	0.50	02/27/1997		1173
TCLP-Carbon Tetrachloride		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-Chlorobenzene		<0.025	mg/L	0.025	02/27/1997		1173

All parameters should be less than the reporting limit.

QUALITY CONTROL REPORT
BLANKS

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Blank Result	Units	Reporting Limit	Date Analyzed	Prep Batch Number	Run Batch Number
TCLP-Chloroform		<0.025	mg/L	0.025	02/27/1997		1172
TCLP-1,2-Dichloroethane		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-1,1-Dichloroethene		<0.025	mg/L	0.025	02/27/1997		1171
TCLP-Tetrachloroethene		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-Trichloroethene		<0.025	mg/L	0.025	02/27/1997		1173
TCLP-Vinyl chloride		<0.05	mg/L	0.05	02/27/1997		1171

All parameters should be less than the reporting limit.

QUALITY CONTROL REPORT
CONTINUING CALIBRATION VERIFICATION STANDARD

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	CCVS True Concentration	Units	CCVS Concentration Found	CCVS Percent Recovery	Date Analyzed	Run Batch Number
Cyanide, Reactive		1.0	mg/kg	1.0	100.0	02/24/1997	496
Sulfide, Reactive		1000	mg/kg	1000	100.0	02/24/1997	519
TCLP-Arsenic, ICP		1.00	mg/L	1.10	110.0	02/19/1997	1516
TCLP-Arsenic, ICP		1.00	mg/L	1.10	110.0	02/19/1997	1516
TCLP-Barium, ICP		1.00	mg/L	0.99	99.0	02/19/1997	1403
TCLP-Barium, ICP		1.00	mg/L	0.99	99.0	02/19/1997	1403
TCLP-Cadmium, ICP		1.00	mg/L	1.02	102.0	02/19/1997	1578
TCLP-Cadmium, ICP		1.00	mg/L	1.02	102.0	02/19/1997	1578
TCLP-Chromium, ICP		1.00	mg/L	1.01	101.0	02/19/1997	1577
TCLP-Chromium, ICP		1.00	mg/L	1.01	101.0	02/19/1997	1577
TCLP-Lead, ICP		1.00	mg/L	1.00	100.0	02/19/1997	1566
TCLP-Lead, ICP		1.00	mg/L	1.00	100.0	02/19/1997	1566
TCLP-Mercury, CVAA		0.50	mg/L	0.52	104.0	02/19/1997	1334
TCLP-Selenium, ICP		1.00	mg/L	1.04	104.0	02/19/1997	1515
TCLP-Selenium, ICP		1.00	mg/L	1.04	104.0	02/19/1997	1515
TCLP-Silver, ICP		1.00	mg/L	0.98	98.0	02/19/1997	1568
TCLP-Silver, ICP		1.00	mg/L	0.98	98.0	02/19/1997	1568
TCLP-ACID EXTRACTABLES - 8270							
TCLP-Cresols, Total		0.10	mg/L	0.078	78.0	02/24/1997	419
TCLP-Pentachlorophenol		0.050	mg/L	0.057	114.0	02/24/1997	419
TCLP-2,4,5-Trichlorophenol		0.050	mg/L	0.045	90.0	02/24/1997	419
TCLP-2,4,6-Trichlorophenol		0.050	mg/L	0.045	90.0	02/24/1997	419
TCLP-BASE NEUTRALS - 8270							
TCLP-1,4-Dichlorobenzene		0.050	mg/L	0.040	80.0	02/24/1997	418
TCLP-2,4-Dinitrotoluene		0.050	mg/L	0.044	88.0	02/24/1997	418
TCLP-Hexachlorobenzene		0.050	mg/L	0.055	110.0	02/24/1997	418
TCLP-Hexachlorobutadiene		0.050	mg/L	0.049	98.0	02/24/1997	418
TCLP-Hexachloroethane		0.050	mg/L	0.039	78.0	02/24/1997	418

CCVS - Continuing Calibration Verification Standard

QUALITY CONTROL REPORT
CONTINUING CALIBRATION VERIFICATION STANDARD

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	CCVS True Concentration	Units	CCVS Concentration Found	CCVS Percent Recovery	Date Analyzed	Run Batch Number
TCLP-Nitrobenzene		0.050	mg/L	0.040	80.0	02/24/1997	418
TCLP-Pyridine		0.050	mg/L	0.042	84.0	02/24/1997	418
TCLP-8240							
TCLP-Benzene		0.020	mg/L	0.023	115.0	02/27/1997	1173
TCLP-2-Butanone (MEK)		0.020	mg/L	0.023	115.0	02/27/1997	1173
TCLP-Carbon Tetrachloride		0.020	mg/L	0.019	95.0	02/27/1997	1173
TCLP-Chlorobenzene		0.020	mg/L	0.021	105.0	02/27/1997	1173
TCLP-Chloroform		0.020	mg/L	0.022	110.0	02/27/1997	1173
TCLP-1,2-Dichloroethane		0.020	mg/L	0.022	110.0	02/27/1997	1173
TCLP-1,1-Dichloroethene		0.020	mg/L	0.020	100.0	02/27/1997	1173
TCLP-Tetrachloroethene		0.020	mg/L	0.023	115.0	02/27/1997	1173
TCLP-Trichloroethene		0.020	mg/L	0.022	110.0	02/27/1997	1173
TCLP-Vinyl chloride		0.020	mg/L	0.018	90.0	02/27/1997	1173

CCVS - Continuing Calibration Verification Standard.

QUALITY CONTROL REPORT
MATRIX SPIKE/MATRIX SPIKE DUPLICATE

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Units	Sample Result	Spike Amount Added	Matrix Spike Result	MS Percent Recovery	Duplicate Spike Amount Added	MSD Result	MSD Percent Recovery	MS/MSD RPD	Date Analyzed	Prep Batch Number	Run Batch Number
TCLP-Arsenic, ICP		mg/L	<0.03	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/18/1997		1516
TCLP-Arsenic, ICP		mg/L	<0.03	1.00	1.03	103.0	1.00	1.08	108.0	4.7	02/19/1997	1200	1516
TCLP-Barium, ICP		mg/L	<0.01	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1403
TCLP-Barium, ICP		mg/L	0.57	1.00	1.41	84.0	1.00	1.61	94.0	11.2	02/19/1997	1200	1403
TCLP-Cadmium, ICP		mg/L	<0.01	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1578
TCLP-Cadmium, ICP		mg/L	<0.01	1.00	0.92	92.0	1.00	0.98	98.0	6.3	02/19/1997	1200	1578
TCLP-Chromium, ICP		mg/L	<0.01	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1577
TCLP-Chromium, ICP		mg/L	0.04	1.00	0.95	91.0	1.00	1.03	99.0	8.4	02/19/1997	1200	1577
TCLP-Lead, ICP		mg/L	<0.03	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1586
TCLP-Lead, ICP		mg/L	0.42	1.00	1.38	96.0	1.00	1.38	96.0	8.7	02/19/1997	1200	1586
TCLP-Mercury, CVAA		mg/L	0.0002	0.50	0.50	100.0	0.50	0.50	100.0	0.0	02/19/1997		1334
TCLP-Selenium, ICP		mg/L	<0.04	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/18/1997		1515
TCLP-Selenium, ICP		mg/L	<0.04	1.00	1.05	105.0	1.00	1.14	114.0	8.2	02/19/1997	1200	1515
TCLP-Silver, ICP		mg/L	<0.01	1.00	1.00	100.0	1.00	1.00	100.0	0.0	02/19/1997		1568
TCLP-Silver, ICP		mg/L	<0.01	1.00	0.88	88.0	1.00	0.93	93.0	5.5	02/19/1997	1200	1568
TCLP-ACID EXTRACTABLES - 8270													
TCLP-Cresols, Total		mg/L	<0.066	0.30	0.109	36.3	0.30	0.111	37.0	1.9	02/24/1997	434	419
TCLP-Pentachlorophenol		mg/L	<0.33	0.10	0.043	43.0	0.10	0.049	49.0	13.0	02/24/1997	434	419
TCLP-2,4,5-Trichlorophenol		mg/L	<0.066	0.10	0.044	44.0	0.10	0.048	48.0	8.7	02/24/1997	434	419
TCLP-2,4,6-Trichlorophenol		mg/L	<0.066	0.10	0.046	46.0	0.10	0.041	41.0	15.7	02/24/1997	434	419
TCLP-BASE NEUTRALS - 8270													
TCLP-1,4-Dichlorobenzene		mg/L	<0.066	0.10	0.040	40.0	0.10	0.042	42.0	4.9	02/24/1997	434	418
TCLP-2,4-Dinitrotoluene		mg/L	<0.066	0.10	0.043	43.0	0.10	0.044	44.0	2.3	02/24/1997	434	418
TCLP-Hexachlorobenzene		mg/L	<0.066	0.10	0.044	44.0	0.10	0.050	50.0	12.8	02/24/1997	434	418
TCLP-Hexachlorobutadiene		mg/L	<0.066	0.10	0.046	46.0	0.10	0.048	48.0	6.5	02/24/1997	434	418

NOTE: The Quality Control data in this report reflects the batch in which your sample was prepped and/or analyzed. The sample selected for QA may not necessarily be your sample.

QUALITY CONTROL REPORT
MATRIX SPIKE/MATRIX SPIKE DUPLICATE

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Units	Sample Result	Spike Amount Added	Matrix Spike Result	MS Percent Recovery	Duplicate Spike Amount Added	MSD Result	MSD Percent Recovery	MS/MSD RPD	Date Analyzed	Prep Batch Number	Run Batch Number
TCLP-Hexachloroethane		mg/L	<0.066	0.20	0.048	48.0	0.10	0.045	45.0	2.1	02/24/1997	434	418
TCLP-Nitrobenzene		mg/L	<0.066	0.10	0.046	46.0	0.10	0.047	47.0	2.2	02/24/1997	434	418
TCLP-Pyridine		mg/L	<0.066	0.10	0.060	60.0	0.10	0.062	62.0	3.3	02/24/1997	434	418
TCLP-8260													
TCLP-Benzene		mg/L	<0.025	0.020	0.025	125.0	0.020	0.026	125.0	0.0	02/27/1997		1173
TCLP-2-Butanone (MEK)		mg/L	<0.50	0.020	0.019	95.0	0.020	0.018	90.0	5.4	02/27/1997		1173
TCLP-Carbon Tetrachloride		mg/L	<0.025	0.020	0.020	100.0	0.020	0.019	95.0	5.0	02/27/1997		1173
TCLP-Chlorobenzene		mg/L	<0.025	0.020	0.023	115.0	0.020	0.023	115.0	0.0	02/27/1997		1173
TCLP-Chloroform		mg/L	<0.025	0.020	0.024	120.0	0.020	0.023	115.0	4.3	02/27/1997		1173
TCLP-1,2-Dichloroethane		mg/L	<0.025	0.020	0.022	110.0	0.020	0.022	110.0	0.0	02/27/1997		1173
TCLP-1,1-Dichloroethene		mg/L	<0.025	0.020	0.021	105.0	0.020	0.021	105.0	0.0	02/27/1997		1173
TCLP-Tetrachloroethene		mg/L	<0.025	0.020	0.024	120.0	0.020	0.021	105.0	13.3	02/27/1997		1173
TCLP-Trichloroethene		mg/L	<0.025	0.020	0.022	110.0	0.020	0.022	110.0	0.0	02/27/1997		1173
TCLP-Vinyl chloride		mg/L	<0.05	0.020	0.017	85.0	0.020	0.015	75.0	12.5	02/27/1997		1173

NOTE: The Quality Control data in this report reflects the batch in which your sample was prepped and/or analyzed.
The sample selected for QA may not necessarily be your sample.

QUALITY CONTROL REPORT
DUPLICATES

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Units	Sample Result	Duplicate Sample Result	RPD	Date Analyzed	Prep Batch Number	Run Batch Number
pH, Corrosivity		units	7.24	7.31	0.4	02/20/1997		1400

QUALITY CONTROL REPORT
LABORATORY CONTROL STANDARD

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Analyte	Prep Batch No.	Run Batch No.	LCS True Conc	Units	LCS Conc Found	LCS % Rec.	LCS Dup Conc. Found	LCS Dup % Rec	LCS % RPD	Flag	Date Analyzed
Cyanide, Reactive		496	1000	mg/kg	379	37.9					02/24/1997
pH, Corrosivity		1400	9.18	units	8.94	97.4					02/20/1997
Sulfide, Reactive		519	1000	mg/kg	960	96.0					02/24/1997
TCLP-Arsenic, ICP	1200	1516	1.00	mg/L	1.05	105.0					02/18/1997
TCLP-Barium, ICP	1200	1403	1.00	mg/L	1.00	100.0					02/19/1997
TCLP-Cadmium, ICP	1200	1576	1.00	mg/L	0.99	99.0					02/19/1997
TCLP-Chromium, ICP	1200	1577	1.00	mg/L	0.99	99.0					02/19/1997
TCLP-Lead, ICP	1200	1566	1.00	mg/L	0.98	98.0					02/19/1997
TCLP-Mercury, CVAA		1324	0.50	mg/L	0.57	114.0					02/19/1997
TCLP-Selenium, ICP	1200	1515	1.00	mg/L	0.97	97.0					02/19/1997
TCLP-Silver, ICP	1200	1566	1.00	mg/L	0.91	91.0					02/19/1997
TCLP-ACID EXTRACTABLES - 8270											
TCLP-Cresols, Total	434	419	0.20	mg/L	0.137	68.7					02/24/1997
TCLP-Pentachlorophenol	434	419	0.10	mg/L	0.038	38.0					02/24/1997
TCLP-2,4,6-Trichlorophenol	434	419	0.10	mg/L	0.047	47.0					02/24/1997
TCLP-2,4,5-Trichlorophenol	434	419	0.10	mg/L	0.057	57.0					02/24/1997
TCLP-BASE NEUTRALS - 8270											
TCLP-1,4-Dichlorobenzene	434	418	0.10	mg/L	0.065	65.0					02/24/1997
TCLP-2,4-Dinitrotoluene	434	418	0.10	mg/L	0.056	56.0					02/24/1997
TCLP-Hexachlorobenzene	434	418	0.10	mg/L	0.050	50.0					02/24/1997
TCLP-Hexachlorobutadiene	434	418	0.10	mg/L	0.038	38.0					02/24/1997
TCLP-Hexachloroethane	434	418	0.10	mg/L	0.046	46.0					02/24/1997
TCLP-Nitrobenzene	434	418	0.10	mg/L	0.058	58.0					02/24/1997
TCLP-Pyridine	434	418	0.10	mg/L	0.061	61.0					02/24/1997
TCLP-8240											
TCLP-Benzene		1173	0.020	mg/L	0.023	115.0					02/27/1997
TCLP-2-Butanone (MEK)		1173	0.020	mg/L	0.026	130.0					02/27/1997
TCLP-Carbon Tetrachloride		1173	0.020	mg/L	0.020	100.0					02/27/1997
TCLP-Chlorobenzene		1173	0.020	mg/L	0.023	115.0					02/27/1997
TCLP-Chloroform		1173	0.020	mg/L	0.022	110.0					02/27/1997
TCLP-1,2-Dichloroethane		1173	0.020	mg/L	0.021	105.0					02/27/1997

LCS - Laboratory Control Standard

For samples with insufficient sample volume, an LCS/LCS duplicate is reported instead of an MS/MSD.

QUALITY CONTROL REPORT
LABORATORY CONTROL STANDARD

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Analyte	Prep Batch No.	Run Batch No.	LCS True Conc	Units	LCS Conc Found	LCS % Rec.	LCS Dup Conc. Found	LCS Dup % Rec	LCS % RPD	Flag	Date Analyzed
TCLP-1,1-Dichloroethene		1173	0.020	mg/L	0.021	105.0					02/27/1997
TCLP-Tetrachloroethene		1173	0.020	mg/L	0.027	135.0					02/27/1997
TCLP-Trichloroethene		1173	0.020	mg/L	0.023	115.0					02/27/1997
TCLP-Vinyl chloride		1173	0.020	mg/L	0.018	90.0					02/27/1997

LCS - Laboratory Control Standard

For samples with insufficient sample volume, an LCS/LCS duplicate is reported instead of an MS/MSD.

SPIKES

Ray Dockery
BAKER OIL TOOLS
P.O. Box 1828
Hobbs, NM 88240

02/28/1997

EPIC Job Number: 97.00485

Project Description: Hobbs Samples
Job Description: Hobbs Samples

Parameter	Flag	Date Analyzed	Units	Prep Batch Number	Run Batch Number	Spiked Sample Result	Sample Result	Spike Amount	Percent Recovery
Cyanide, Reactive		02/24/1997	mg/kg		496	298	<0.25	1000	29.8
Sulfide, Reactive		02/24/1997	mg/kg		519	240	<12.5	250	96.0

Advisory Control Limits for Percent Recovery are 85-115%

CHAIN OF CUSTODY RECORD

EPIC LABORATORIES, INC.
1548 VALWOOD PARKWAY, SUITE 118
CARROLLTON, TEXAS 75006
DALLAS (972) 406-6100
AUSTIN (512) 928-8905

COMPANY: Baker Oil Tools — Hobbs NM 88240
ADDRESS: 502 West County Road — Hobbs NM
PHONE: 505-397-3671 FAX: 505-393-4213
PROJECT NAME/LOCATION: Hobbs Sump
PROJECT NUMBER:
PROJECT MANAGER:

REPORT TO: Ray Dockery
INVOICE TO: Ray Dockery
P.O. NO.:
EPIC QUOTE NO.:

SAMPLED BY (PRINT NAME): Dennis Collins Jr
SIGNATURE:
(PRINT NAME): B.H. Russell
SIGNATURE: Bill Russell

To assist us in selecting the proper method:
Is this work being conducted for regulatory compliance monitoring? Yes ✓ No
Is this work being conducted for regulatory enforcement action? Yes No ✓
Which regulations apply: RCRA ___ NPDES Wastewater ___ UST ___ Drinking Water ___ Other ___ None ___

#	TIME	SAMPLE ID/DESCRIPTION	MATRIX	GRAB	COMP	# and Type of Containers: HCl	HNO3	H2SO4	OTHER	TCLP-metals	TCLP semi-vols	TCLP-volatiles	BOT	COMMENTS
1	2/11/97 0730	#1 - Sump (Main)	WL		X				1	✓	✓	✓	✓	
2	2/11/97 0730	#2 - Sump (Main)	WL		X				1	✓	✓	✓	✓	

CONDITION OF SAMPLE: BOTTLES INTACT? YES / NO — COC SEALS PRESENT AND INTACT? YES / NO — TEMPERATURE UPON RECEIPT: 4°C
FIELD FILTERED? YES / NO — VOLATILES FREE OF HEADSPACE? YES / NO — Bottles supplied by EPIC? YES / NO

SAMPLE REMAINDER DISPOSAL: RETURN SAMPLE REMAINDER TO CLIENT VIA ___ DATE ___
I REQUEST EPIC TO DISPOSE OF ALL SAMPLE REMAINDERS ✓

RELINQUISHED BY:	DATE	TIME	RECEIVED BY:	RELINQUISHED BY:	DATE	TIME	RECEIVED FOR EPIC BY:
					2/14/97	1040	Barbara Walker

METHOD OF SHIPMENT: FED EX -

REMARKS: Samples stored with ice for 30 min. Sample was taken 1 foot from bottom with a trip sampler.

PT 1 - ORIGINAL - WHITE PT 2 - EPIC PROJECT MANAGER - YELLOW PT 3 - CUSTOMER COPY - PINK