

AP - 017

**ANNUAL
MONITORING REPORT**

YEAR(S):
2000

ANNUAL MONITORING REPORT

**EOTT ENERGY CORP.
TNM 97-17
LEA COUNTY, NEW MEXICO**

PREPARED FOR:

**EOTT PIPELINE COMPANY
P. O. BOX
MIDLAND, TEXAS 79704**

Ms. Lennah Frost

PREPARED BY:

**ENVIRONMENTAL TECHNOLOGY GROUP, INC.
4600 WEST WALL STREET
MIDLAND, TEXAS 79704**

March 2000

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INTRODUCTION

Environmental Technology Group, Inc. (ETGI), on behalf of EOTT Energy Corp. (EOTT), prepared this annual report in compliance with the New Mexico Oil Conservation Division (ODC) letter of May 1998, requiring submittal of an annual report by April 1 of each year. The report presents the results of the quarterly ground water monitoring events only. Additional site activities and remedial work is summarized in reports previously submitted to the OCD. For reference, a site location map is provided as Figure 1.

Ground water monitoring was conducted during four quarterly events in 1999 to assess the levels and extent of dissolved phase and free phase petroleum hydrocarbon constituents. The groundwater monitoring events consisted of measuring static water levels in the monitoring wells, checking for the presence of phase-separated hydrocarbons (PSH), and purging and sampling of each well exhibiting sufficient recharge. Monitoring wells containing measurable levels of PSH were not sampled.

FIELD ACTIVITIES

The site monitoring wells were gauged and sampled on February 3, May 13, August 24 and November 5, 1999. During each sampling event, the monitoring wells, designated to be sampled, were purged of approximately 3 well volumes of water or until the wells were dry using a PVC bailer or electrical Grundfos Pump. Groundwater was allowed to recharge and samples were obtained using disposable Teflon samplers. Monitoring wells with a measurable presence of PSH were not sampled. Water samples were stored in clean, glass containers provided by the laboratory and placed on ice in the field. Purge water was collected in a polystyrene tank and introduced into the existing ground water treatment system.

GROUNDWATER GRADIENT

Locations of the monitoring wells and the inferred ground water gradient, as measured on November 5, 1999, are depicted on Figure 2. The ground water elevation data are provided as Table 1. Groundwater elevation contours, generated from the final semi-annual event of 1999 water level measurements, indicated a general gradient of approximately 0.003 ft/ft to the south-southeast. The depth to groundwater, as measured from the top of the well casing, ranged between 20.72 to 22.60 feet.

On November 5, 1999, 0.96 feet of PSH was detected in monitoring well MW-4. This was the first monitoring event for the recently completed well. Recovery of PSH from the well will be implemented in early February 2000, utilizing a down-hole skimmer pump as described in the recently approved Abatement Plan.

LABORATORY RESULTS

Ground water samples obtained during the first two sampling events were mailed to Xenco Laboratories in San Antonio, Texas. Ground water samples collected during the latter two events were hand delivered to Environmental Laboratory of Texas, Midland, Texas for determination of benzene, toluene, ethylbenzene and total xylenes (BTEX) concentrations by EPA Method SW846-8020 and 8021B. The ground water chemistry data are provided as Table 2 and the Laboratory Reports are provided as Appendix A. Laboratory results for all of the site ground water samples, obtained during the 1999 annual period, indicated that BTEX concentrations were below detection limits.

SUMMARY

This report presents the results of monitoring activities for the annual monitoring period of calendar year 1999. On November 5, 1999, 0.96 feet of PSH was detected in monitoring well MW-4. This was the first monitoring event for the recently completed well. Recovery of PSH from the well will be implemented in early February 2000, utilizing a down-hole skimmer pump as described in the recently approved Abatement Plan.

Dissolved phase concentrations of BTEX were non-detect in all of the monitoring wells. The ground water gradient is to the south-southeast at a slope of 0.003 ft/ft. There is no evidence of off-site impact as a result of PSH or dissolved phase constituent migration in the ground water.

FIGURES

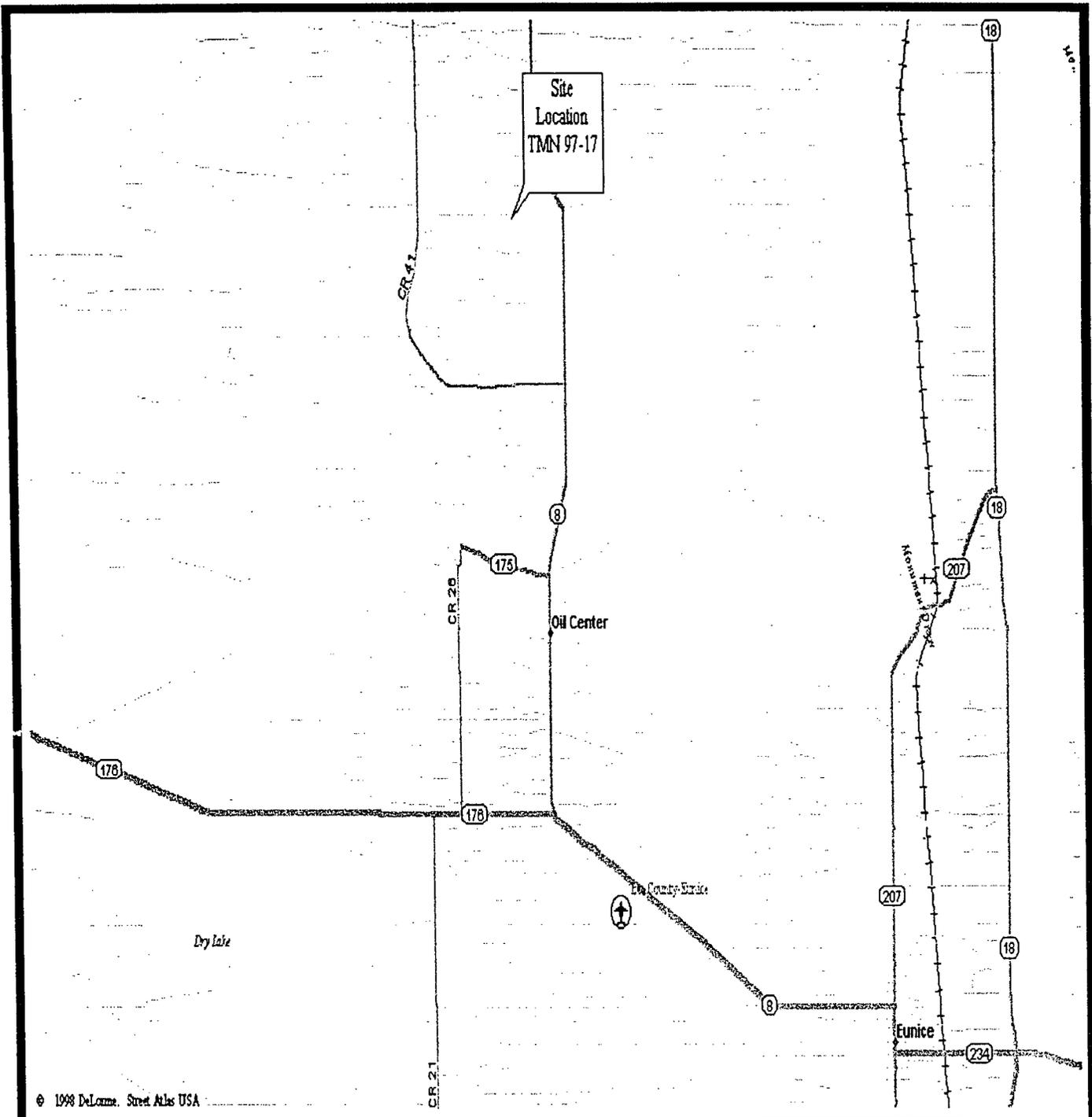


FIGURE
1

Not To Scale

Site Location Map

EOTT Energy Corp.
TNM 97-17
Lea County, NM

Environmental
Technology
Group, Inc.

11 - 22 - 99 RS

ETGI Project # EOT 1024C



LEGEND

- Existing Monitoring Wells
- Existing Monitoring Wells
- Existing Soil Borings
- Inferred Ground Water Flow Direction
- Inferred Ground Water Gradient Contours
- Stockpile Soil
- Excavated Area

3,488.7 Ground Water Elevations



Figure 2
 Inferred Ground Water
 Contours 11/05/99

TNM 97-17
 Lea County, NM

Environmental Technology Group, Inc.

Scale: 1" = 40'	Prep By: BS	Checked By: JH
November 20, 1999	ETGI Project # DOT 9524C	

TABLES

TABLE 1
GROUNDWATER ELEVATION TABLE
TNM 97-17
LEA COUNTY, NM
ETGI PROJECT# EOT1015C

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUNDWATER ELEVATION
MW-1	02/03/99	3,510.90	-	22.46	0.00	3,488.44
MW-1	05/13/99	3,510.90	-	22.11	0.00	3,488.79
MW-1	08/24/99	3,510.90	-	23.09	0.00	3,487.81
MW-1	11/05/99	3,510.90	-	22.60	0.00	3,488.30
MW-2	02/03/99	3,509.23	-	21.47	0.00	3,487.76
MW-2	05/13/99	3,509.23	-	21.11	0.00	3,488.12
MW-2	08/24/99	3,509.23	-	21.88	0.00	3,487.35
MW-2	11/05/99	3,509.23	-	21.51	0.00	3,487.72
MW-3	02/03/99	3,508.82	-	21.06	0.00	3,487.76
MW-3	05/13/99	3,508.82	-	20.72	0.00	3,488.10
MW-3	08/24/99	3,508.82	-	21.43	0.00	3,487.39
MW-3	11/05/99	3,508.82	-	21.10	0.00	3,487.72
MW-4	11/05/99	3,509.15	20.96	21.92	0.96	3,488.05

TABLE 2
GROUND WATER CHEMISTRY
TNM 97-17
LEA COUNTY, NEW MEXICO
ETGI PROJECT # EOT1015C

SAMPLE	SAMPLE DATE	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYLBENZENE (mg/L)	mp-XYLENE (mg/L)	o-XYLENE (mg/L)
MW-1	02/03/99	<0.001	<0.001	<0.001	<0.002	<0.001
MW-1	05/13/99	<0.001	<0.001	<0.001	<0.002	<0.001
MW-1	08/23/99	<0.001	<0.001	0.004	<0.001	<0.001
MW-1	11/04/99	<0.001	<0.001	0.004	<0.001	<0.001
MW-2	02/03/99	<0.001	<0.001	<0.001	<0.002	<0.001
MW-2	05/13/99	<0.001	<0.001	<0.001	<0.002	<0.001
MW-2	08/23/99	<0.001	<0.001	<0.001	<0.001	<0.001
MW-2	11/04/99	<0.001	<0.001	<0.001	<0.001	<0.001
MW-3	02/03/99	<0.001	<0.001	<0.001	<0.002	<0.001
MW-3	05/13/99	<0.001	<0.001	<0.001	<0.002	<0.001
MW-3	08/23/99	<0.001	<0.001	<0.001	<0.001	<0.001
MW-3	11/04/99	<0.001	<0.001	<0.001	<0.001	<0.001

Methods: EPA SW 846-8020, 5030

APPENDIX A



11381 Meadowglen Suite L
Houston, Texas 77082-2647
(281) 589-0692 Fax: (281) 589-0695
Houston - Dallas - San Antonio - Latin America

February 8, 1999

Project Manager: S. Grover/T. Nix
KEI Consultants, Inc.
5309 Wurzbach Rd. Suite 100
San Antonio, TX 78238

Reference: XENCO Report No.: -90447
Project Name: TNMPL
Project ID: 810051-1-0
Project Address: Lea Co, NM

Dear S. Grover/T. Nix:

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 -90447.r 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, completeness or properly flagged.

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. -90447r 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 operates under the A2LA guidelines. Our Quality System meets ISO/IEC Guide 25 requirements which 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 L. Clemons, II
QA/QC Manager

Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.

Certified and approved by numerous States and Agencies.

A Small Business and Minority Status Company that delivers SERVICE and QUALITY!



**ANALYTICAL CHAIN OF CUSTODY REPORT
CHRONOLOGY OF SAMPLES**

KEI Consultants, Inc.

XENCO COC#: -90447

Project ID: 810051-1-0
Project Manager: S. Grover/T. Nix
Project Location: Lea Co, NM

Date Received in Lab: Feb 4, 1999 10:20 by LY

XENCO contact : Carlos Castro/Karen Olson

Project Name: TNMPL

Date and Time									
Field ID	Lab. ID	Method Name	Method ID	Units	Turn Around	Sample Collected	Addition Requested	Extraction	Analysis
1 MW-1	90447-001	BTEX	SW-846	ppm	10 days	Feb 3, 1999 11:00		Feb 6, 1999 by HL	Feb 6, 1999 23:46 by HL
2 MW-2	90447-002	BTEX	SW-846	ppm	10 days	Feb 3, 1999 11:30		Feb 6, 1999 by HL	Feb 7, 1999 00:04 by HL
3 MW-3	90447-003	BTEX	SW-846	ppm	10 days	Feb 3, 1999 12:00		Feb 6, 1999 by HL	Feb 7, 1999 00:03 by HL

KEI Consultants, Inc.
Project Name: **TNMPL**

Project ID: 810051-1-0

Project Manager: S. Grover/T. Nix

Project Location: Lea Co, NM

Date Received in Lab : Feb 4, 1999 10:20

Date Report Faxed: Feb 8, 1999

XENCO contact : Carlos Castro/Karen Olson

Analysis Requested	Lab ID:	90447 001	90447 002	90447 003	
	Field ID:	MW-1	MW-2	MW-3	
	Depth:				
	Matrix:	Liquid	Liquid	Liquid	
	Sampled:	02/03/99 11:00	02/03/99 11:30	02/03/99 12:00	
BTEX	Analyzed:	02/06/99	02/07/99	02/07/99	
EPA 8021B	Units:	ppm R.L.	ppm R.L.	ppm R.L.	
Benzene		< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	
Toluene		< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	
Ethybenzene		< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	
m,p-Xylene		< 0.002 (0.002)	< 0.002 (0.002)	< 0.002 (0.002)	
o-Xylene		< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	
Total BTEX		N.D.	N.D.	N.D.	

This report summary, and the entire report it represents, has been made for the exclusive and confidential use of KEI Consultants, Inc..
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.


Eddie L. Clemmons, II
QA/QC Manager



Certificate Of Quality Control for Batch : 19A25A68

SW- 846 5030/8021B BTEx

Date Validated: Feb 8, 1999 12:00

Date Analyzed: Feb 6, 1999 17:45

Analyst: HL

Matrix: Liquid

Parameter	[A]	[B]	[C]	[D]	[E]	Blank Limit	[F]	[G]	[H]	[I]	[J]
	Blank Result ppm	Blank Spike Result ppm	Blank Spike Duplicate Result ppm	Blank Spike Amount ppm	Detection Limit ppm	Relative Difference %	QC	QC	QC	Blank Spike Recovery Range %	Qualifier
							Spike Relative Difference %	Blank Spike Recovery %	B.S.D. Recovery %		
Benzene	< 0.0010	0.1050	0.1040	0.1000	0.0010	20.0	1.0	104.9	103.9	65-135	
Toluene	< 0.0010	0.1050	0.1040	0.1000	0.0010	20.0	1.0	104.9	103.9	65-135	
Ethylbenzene	< 0.0010	0.1050	0.1030	0.1000	0.0010	20.0	1.9	104.9	102.9	65-135	
m,p-Xylene	< 0.0020	0.2140	0.2090	0.2000	0.0020	20.0	2.4	107.0	104.5	65-135	
o-Xylene	< 0.0010	0.1090	0.1070	0.1000	0.0010	20.0	1.9	108.9	106.9	65-135	

Spike Relative Difference [F] = $200 \cdot (B-C)/(B+C)$
 Blank Spike Recovery [G] = $100 \cdot (B-A)/[D]$
 B.S.D. = Blank Spike Duplicate
 B.S.D. Recovery [H] = $100 \cdot (C-A)/[D]$
 N.D. = Below detection limit or not detected
 All results are based on MDI and validated for QC purposes

Eddie L. Clermons, II
 QA/QC Manager



11381 Meadowglen Suite L
Houston, Texas 77082-2647
(281) 589-0692 Fax: (281) 589-0695
Houston - Dallas - San Antonio - Latin America

May 20, 1999

Project Manager: Stan Grover
KEI Consultants, Ltd.
5309 Wurzbach Rd. Suite 100
San Antonio, TX 78238

Reference: XENCO Report No.: -91939
Project Name: EOTT
Project ID: 810051-1-0
Project Address: Lea County, NM

Dear Stan Grover:

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 -91939.v 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, completeness or properly flagged.

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. -91939v 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 operates under the A2LA guidelines. Our Quality System meets ISO/IEC Guide 25 requirements which 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 L. Clemens, II
QA/QC Manager

Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.

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ANALYTICAL CHAIN OF CUSTODY REPORT CHRONOLOGY OF SAMPLES

KEI Consultants, Ltd.

Project Name: EOTT

XENCO COC#: -91939

Project ID: 810051-1-0

Project Manager: Stan Grover

Project Location: Lea County, NM

Date Received in Lab: May 14, 1999 09:45 by JO

XENCO contact : Carlos Casiro/Debbie Simmons

		Date and Time							
Field ID	Lab. ID	Method Name	Method ID	Units	Turn Around	Sample Collected	Addition Requested	Extraction	Analysis
1 MW-1	91939-001	BTEX	SW-846	ppm	7 days	May 13, 1999 08:20		May 18, 1999 by MGC	May 18, 1999 16:48 by MG
2 MW-2	91939-002	BTEX	SW-846	ppm	7 days	May 13, 1999 09:16		May 18, 1999 by MGC	May 18, 1999 16:08 by MG
3 MW-3	91939-003	BTEX	SW-846	ppm	7 days	May 13, 1999 09:00		May 18, 1999 by MGC	May 18, 1999 16:32 by MG

KEI Consultants, Ltd.

Project Name: EOTT

Project ID: 810051-1-0

Project Manager: Stan Grover

Project Location: Lea County, NM

Date Received in Lab : May 14, 1999 09:45

Date Report Faxed: May 20, 1999

XENCO contact : Carlos Castro/Debbie Simmons

Analysis Requested	Lab ID:	91939 001	91939 002	91939 003	
	Field ID:	MMV-1	MMV-2	MMV-3	
	Depth:				
	Matrix:	Liquid	Liquid	Liquid	
	Sampled:	05/13/99 08:20	05/13/99 09:15	05/13/99 09:00	
BTEX	Analyzed:	05/18/99	05/18/99	05/18/99	
EPA 8021B	Units:	ppm R.L.	ppm R.L.	ppm R.L.	
Benzene		< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	
Toluene		< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	
Ethylbenzene		< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	
m,p-Xylene		< 0.002 (0.002)	< 0.002 (0.002)	< 0.002 (0.002)	
o-Xylene		< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	
Total BTEX		N.D.	N.D.	N.D.	

This report summary, and the entire report it represents, has been made for the exclusive and confidential use of KEI Consultants, Ltd.. 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.


Eddie L. Clemons, II
QA/QC Manager



Certificate of Quality Control for Batch: 19A03C11

SW- 346 5030/3021B BTEX

Date Validated: May 19, 1999 14:00
 Date Analyzed: May 18, 1999 12:23

Analyst: MG
 Matrix: Liquid

Parameter	[A]	[B]	[C]	[D]	[E]	[F]		[G]		[H]		[I]	[J]
	Blank Result ppm	Blank Spike Result ppm	Blank Spike Duplicate Result ppm	Blank Spike Amount ppm	Detection Limit ppm	Blank Limit Relative Difference %	Spike Relative Difference %	QC	Blank Spike Recovery %	QC	B.S.D. Recovery %	Blank Spike Recovery Range %	Qualifier
Benzene	< 0.0010	0.0961	0.0933	0.1000	0.0010	20.0	3.0		96.1	93.3		65-135	
Toluene	< 0.0010	0.0947	0.0920	0.1000	0.0010	20.0	2.9		94.7	92.0		65-135	
Ethylbenzene	< 0.0010	0.1030	0.1001	0.1000	0.0010	20.0	2.9		103.0	100.1		65-135	
m,p-Xylene	< 0.0020	0.1958	0.1907	0.2000	0.0020	20.0	2.6		97.9	95.4		65-135	
o-Xylene	< 0.0010	0.0922	0.0900	0.1000	0.0010	20.0	2.4		92.2	90.0		65-135	

Spike Relative Difference [F] = $200 \cdot (B-C)/(B+C)$
 Blank Spike Recovery [G] = $100 \cdot (B-A)/[D]$
 B.S.D. = Blank Spike Duplicate
 B.S.D. Recovery [H] = $100 \cdot (C-A)/[D]$
 N.D. = Below detection limit or not detected
 All results are based on MDL and validated for QC purposes

Edlie L. Clemmons, II
 QM/QC Manager

ENVIRONMENTAL

LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 915-520-4310

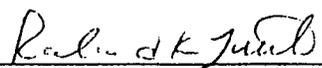
Sample Type: Water
Sample Condition: Intact/ Iced/HCl
Project #: TNM 97-17
Project Name: None Given
Project Location: Lea County, N.M.

Sampling Date: 08/23/99
Receiving Date: 08/27/99
Analysis Date: 08/27/99

ELT#	FIELD CODE	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYLBENZENE (mg/L)	m,p-XYLENE (mg/L)	o-XYLENE (mg/L)
19615	MW-1	<0.001	<0.001	<0.001	<0.001	<0.001
19616	MW-2	<0.001	<0.001	<0.001	<0.001	<0.001
19617	MW-3	<0.001	<0.001	<0.001	<0.001	<0.001

% IA	97	92	93	91	92
% EA	97	89	85	86	86
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: EPA SW 846-8020,5030


Raland K. Tuttle

9-2-99
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ETGI
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 505-392-3760(Ken Dutton)

Sample Type: Water
Sample Condition: Intact/Iced/HCl
Project #: EOT 1015C
Project Name: TNM 97-17
Project Location: Lea County, N.M.

Sampling Date: 11/05/99
Receiving Date: 11/06/99
Analysis Date: 11/06/99

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
21395	MW-1	<0.001	<0.001	0.004	<0.001	<0.001
21396	MW-2	<0.001	<0.001	<0.001	<0.001	<0.001
21397	MW-3	<0.001	<0.001	<0.001	<0.001	<0.001
	% IA	105	101	102	103	102
	% EA	103	98	98	99	98
	BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8021.5030


Caley D. Keene

11/8/99
Date

ENVIRONMENTAL

LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ETGI
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 505-392-3760(Ken Dutton)

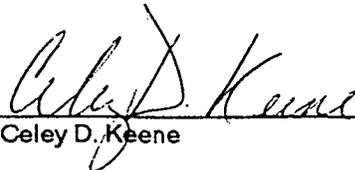
Sample Type: Water
Sample Condition: Intact/Iced/HCl
Project #: EOT 1015C
Project Name: TNM 97-17
Project Location: Lea County, N.M.

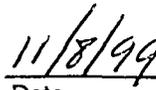
Sampling Date: 11/05/99
Receiving Date: 11/06/99
Analysis Date: 11/06/99

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
21395	MW-1	<0.001	<0.001	0.004	<0.001	<0.001
21396	MW-2	<0.001	<0.001	<0.001	<0.001	<0.001
21397	MW-3	<0.001	<0.001	<0.001	<0.001	<0.001

% IA	105	101	102	103	102
% EA	103	98	98	99	98
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8021,5030


Celey D. Keene


Date