District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505



Submit 1 copy to appropriate District Office and 1 copy to the Santa Fe Office (Revised 3/9/94)

PIT REMEDIATION AND CLOSURE REPORT

	6 10 10	
Operator: Bannon Energy Incorporated	Telephone:	
Address: 30-03		
Facility Or: Tonkin #1, Meter 90467	00000	
Well Name		
Location: Unit or Qtr/Qtr Sec_O_Sec_1	8 T 24 R 3 County Rio	Arriba
Pit Type: Separator Dehydrator	Other <u>Drip</u>	
Land Type: BLM, State, Fe	e X Other	
Pit Location: Pit dimensions: length <u>26'</u> (Attach diagram)	, width <u>26'</u> , depth <u>4'</u>	
	, other	
Footage from reference:1	40'	
Direction from reference: 10	5 Degrees X East North	
	of	
	west So	outh
Depth To Ground Water	Less than 50 feet	(20 points)
(Vertical distance from contaminants to seasonal	50 feet to 99 feet	(10 points)
high water elevation of	Greater than 100 feet	(0 points) <u>20</u>
ground water.)		
Wellhead Protection Area:	V	as (20 maints)
	1	es (20 points)
(Less than 200 feet from a private		Vo (0 points)0_
(Less than 200 feet from a private domestic water source, or; less than		
(Less than 200 feet from a private domestic water source, or; less than 1000 feet from all other water sources.)	Ŋ	No (0 points) 0
(Less than 200 feet from a private domestic water source, or; less than 1000 feet from all other water sources.) Distance To Surface Water:	Less than 200 feet	No (0 points)0
(Less than 200 feet from a private domestic water source, or; less than 1000 feet from all other water sources.) Distance To Surface Water: (Horizontal distance to perennial	Less than 200 feet 200 feet to 1000 feet	(20 points) 0 (20 points) (10 points)
(Less than 200 feet from a private domestic water source, or; less than 1000 feet from all other water sources.) Distance To Surface Water:	Less than 200 feet	No (0 points)0

Date Remediation Started:	10/26/94 Date completed:10/26/94
Remediation Method: Ex	cavation X Approx. cubic yards 20
	ndfarmed Insitu Bioremediation
Remediation Location: Or (i.e. landfarmed onsite, name and location of offsite facility)	nsite OffsiteEnvirotech
General Description of Ren	nedial Action:Some line markers. Pit has oil and water in it. We will load out two trucks
because pit has too much o	il and water in it. At 12' soil light gray. Closed pit. Pushed berms in.
Ground Water Encountered	l: NoX
Final Pit: Closure Sampling: (if multiple samples,	Sample location _ Four walls and center of pit composite
attach sample results and diagram of sample locations and depths)	Sample depth 12'
	Sample Date Sample time
	Sample Results
	Benzene(ppm) Not reported Total PTEV(npm) Not reported
	Total BTEX(ppm) Not reported Field headspace(ppm) 299
	TPH
Ground Water Sample:	Yes NoX (If yes, attach sample results)
I hereby certify that the infe	ormation above is true and complete to the best of my knowledge and belief.
Date 1/8/03 Signature	Printed Name Scott T. Pope and Title Senior ENV. Scientist



Tonkin #1 Meter/Line ID 90467

SITE DETAILS

Legals - Twn: 24N

NMOCD Hazard Ranking: 20

Operator: Bannon Energy Incorporated

Rng: 3W

14...

Sec: 18

Land Type: Fee

Pit Closure Date: 10/26/94

Unit: 0 NOV 2002

RATIONALE FOR RISK-BASED CLOSURE

The pit noted above was assessed and ranked according to the criteria in the New Mexico Oil Conservation Division's (NMOCD) Unlined Surface Impoundment Closure Guidelines.

A test pit was excavated to 12 feet (ft) below ground surface (bgs) where a soil sample was collected for field headspace analysis and laboratory analysis for TPH. Groundwater was not encountered in the test pit. Headspace analysis indicated an organic vapor content of 299 ppm; laboratory analysis indicated a TPH concentration of 51,000 mg/kg. The field headspace analysis and TPH measurement exceeded recommended remediation levels for the Hazard Ranking Score of 20.

Approximately 20 cubic yards of soil were excavated and hauled to Envirotech, a commercial landfarm, for treatment and disposal. The pit was backfilled with clean soil and graded in a manner to direct surface runoff away from the pit area.

A Phase II boring was completed to refusal at 22 ft bgs. No groundwater was encountered in the soil boring. One laboratory sample was collected at 20-22 ft bgs. Headspace analysis indicated an organic vapor content of 0 ppm; laboratory analysis indicated a benzene concentration of <0.5 mg/kg, a total BTEX concentration of <3 mg/kg, and a TPH concentration of <20 mg/kg. The benzene, TPH and BTEX concentrations were below recommended remediation levels for the Hazard Ranking Score.

No Phase III activities were conducted.

El Paso Field Services requests closure of the above mentioned production pit location for the following reasons:

- The primary source, discharge to the pit, has been removed for over eight years.
- The test pit was excavated to the practical extent of the equipment, backfilled and the former pit area graded to direct surface runoff away from the former pit.
- Backfilling the pit with clean soil eliminated the potential for direct contact with hazardous constituents by livestock or the public; i.e., direct contact exposure pathways are incomplete.
- Groundwater was not encountered in the soil boring to 22 ft bgs.
- There are no water supply wells or other sources of fresh water extraction within 1,000 feet of the site.
- Benzene, total BTEX, and TPH concentrations in the soil sample collected at the base of the Phase II
 soil boring at 20 ft bgs were non-detect, indicating that no significant downward constituent
 migration is occurring.



PIT CLOSURE REQUEST

• Residual hydrocarbons remaining in the soil will likely degrade by natural attenuation with minimal risk to the environment.

ATTACHMENTS

Field Pit Assessment Form Revised Field Pit Assessment Form Field Pit Remediation/Closure Form Phase II Soil Boring Log Laboratory Analytical Results

REVISEDFIELD PIT SITE ASSESSMENT FORM

GENER	Meter: 90467 Location: Tookin # Operator #: Operator Name: P/L District: Coordinates: Letter: Section 8 Township: A Range: 3 Or
	NMOCD Zone: Land Type: BLM □ (1) (From NMOCD State □ (2) Maps) Inside □ (1) Fee ☒ (3) Outside ☒ (2) Indian
	Depth to Groundwater Less Than 50 Feet (20 points) 50 Ft to 99 Ft (10 points) Greater Than 100 Ft (0 points) (3)
SSMI	Wellhead Protection Area Is it less than 1000 ft from wells, springs or other sources of fresh water extraction?, or; Is it less than 200 ft from a private domestic water source?
SITE ASSESSMI	(1) YES (20 points) (2) NO (0 points) Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points) (1) 200 Ft to 1000 Ft (10 points) (2)
	Greater Than 1000 Ft (0 points) Name of Surface Water Body (Surface Water Body: Perennial Rivers, Streams, Creeks, Irrigation Canals,
	Ditches, Lakes, Ponds) Distance to Nearest Ephemeral Stream (1) < 100' (Navajo Pits Only) (2) > 100'
	TOTAL HAZARD RANKING SCORE: 2 POINTS
REGRKS	Remarks: Site has been re-assessed, due to initial assessment including washes as a Surface Water Body. Site is <50' Vertical from Cantaco F Medio Cangon.

(assess) 12/16/97

FIELD PIT SITE ASSESSMENT FORM

GENERAL	SK 10/28/94- See notes on back Meter: 90-467 Location: Tonkin No. 1 Operator #: 0430 Operator Name: Exerging P/L District: Qiito Coordinates: Letter: O Section 18 Township: 24 Range: 3 Or Latitude Longitude Pit Type: Dehydrator Location Drip: X Line Drip: Other: Site Assessment Date: 40/25/94 Area: 06 Run: 93
SITE ASSESSMENT	NMOCD Zone: Land Type: BLM
REMAR	Remarks: Redline Book: Inside, Vulnerable Zone Topo: Outside Two pits, location drip pit has liquid in it, Will close one pit: PUSH IN



FIELD SERVICES LABORATORY ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Outside the GWV Zone

SAMPLE IDENTIFICATION

· · · · · · · · · · · · · · · · · · ·	Field ID	Lab ID
SAMPLE NUMBER:	K7 336	946458
MTR CODE SITE NAME:	90467	N/A
SAMPLE DATE TIME (Hrs):	10-26-94	5.93D
SAMPLED BY:		N/A
DATE OF TPH EXT. ANAL.:	10-28-94	10-28-94
DATE OF BTEX EXT. ANAL.:	PIA	NIB
TYPE DESCRIPTION:	VG	Dark Bown sand & chan

REI	VI.	AΙ	₹K	S
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RESULTS

PARAMETER	RESULT	UNITS		QUALIFIE	RS	
			DF	Q	M(g)	₩V(ml)
TPH (418.1)	5/000	MG/KG			./3	28
HEADSPACE PID	299 127 40 131 19	₽PM				
PERCENT SOLIDS	86,5	%				

PERCENT SOLIDS	86,5	%	有事 的人。2017年	
	••	TPH is by EPA Me	ethod 418.1	
Narrative:				
DF = Dilution Factor Used			,	

Approved By:	R	

Date: 11/3/44

FIELD PIT REMEDIATION/CLOSUS FORM

GENERAL	Meter: 90467 Location: Tokkin No. 1 Coordinates: Letter: O Section 18 Township: 24 Range: 3 Or Latitude Longitude Date Started: 10/26/94 Area: 08 Run: 83
FIELD OBSERVATIONS	Sample Number(s): K1336 Sample Depth: Feet Final PID Reading PID Reading Depth Feet Yes No Groundwater Encountered
CLOSURE	Remediation Method: Excavation
REMARKS	Remarks: Some Line Markers Pit Has oil & water in it we will load out Two Trucks. Because Pit Has To much oil & water in it At 12' soil Light gray. Closed Pit. Post in Signature of Specialist: Felly Public

(SP3191) 04/07/94

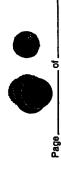


PROJECT NUMBER		NAME OSUÇE	PROJECT NAME PIt Closure Project # 24324		893 843			REQUESTED ANALYSIS	LYSIS	81	CONT" ACT LABORATORY P. O. NUMBER
SAMPLERS: (Signature)		Took	M DATE:	26/99	BMUN JA BNIATNO	TYPE		0208			
LABID DATE	E TIME	≥	SAMPLE NU	/BER			qт , АЧЭ тя	T8 A93	5	Sea	REMARKS
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							\dashv				
REQUESTED TURNAROUND TIME: CHOUTINE CHUSH CARRIER CO.	NAROUND TIME:		Ψ	SAMPLE RECEIPT REMARKS	EMARKS			·	RESULT	RESULTS & INVOICES TO:	ELD SE L PASO
BILL NO:			<u></u> [ಕ	CHARGE CODE					FOE. 500-2144	77.6	P. O. BOX 4990 FARMINGTON, NEW MEXICO 87499
White . Teeting I shoreford	1	Canary - FPNG I ab	1 oh Pink . Field Semnler						200		1023-000-000-

White - Testing Laboratory Canary - EPNG Lab Pink - Field Sampler

FM-08-0565A (Rev. 03-94)

Mahu is Company



5		H	-		ľ			CONTRACT LABORATORY P. O. NUMBER	JABER
Pit Closure Project				REO	UESTED	REQUESTED ANALYSIS	9 C		
SAMPLEPS: (Signature) DATE:	13/98	AL NUME ONTAIN SAMPLE BAYT			l .	P	ENCE		
LABID DATE TIME MATRIX	יובּרט ום:		9T A93	1T8 A93	8 V 7	197 108 1017 1019	# SEON		REMARKS
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REQUESTED TURNAROUND TIME	RANDI E DECEIDT DENADA	97047	$ \ $	7		八八		- 8/4/PB 1431	Colone Milla
C ROUTINE C RUSH	(+ 10)	Tarke 1	T	3¢ C			RESULTS & INVOICES TO	FIELD SERVICE	FIELD SERVICES LABORATORY
CARNIER CO.						<u>:</u> :		EL PASO NATO P. O. BOX 4990	EL PASO NATURAL GAS COMPANY P. O. BOX 4990
BILL NO.:	CHARGE CODE					\$	505,500,0144	FARMINGTON,	, NEW MEXICO 87499
With the second						3	-039-5144		FAX: 505-599-2261



FIELD SERVICES LABORATORY ANALYTICAL REPORT PIT CLOSURE PROJECT

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	CMC407	980540
MTR CODE SITE NAME:	90467	Tonkin #1
SAMPLE DATE TIME (Hrs):	8/3/98	1558
PROJECT:	Phase II	Drilling
DATE OF TPH EXT. ANAL.:	8/13/98	8/14/98
DATE OF BTEX EXT. ANAL.:	8/10/98	8/11/98
TYPE DESCRIPTION:	VG	SOIL

Field Remarks: 20-22'

RESULTS

PARAMETER	RESULT	UNITS		OUALIFI		
			DF.		Min	V(m)
BENZENE	< 0.5	MG/KG	,			
TOLUENE	< 0.5	MG/KG				
ETHYL BENZENE	<0.5	MG/KG		٠.		
TOTAL XYLENES	<1.5	MG/KG	·			
TOTAL BTEX	<3	MG/KG		٠.		
TPH (MOD.8015)	<20	MG/KG				
HEADSPACE PID	0	PP M				
PERCENT SOLIDS	93.7	%				

-- TPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 --

The Surrogate Recovery was at	88.4	% for this sample	All QA/QC was acceptable.
Narretive:		_	

	· · · · · · · · · · · · · · · · · · ·
DF = Dilution Factor Used	
Approved By: Approved By:	Date: 8/25/48

RECORD OF SUBSURFACE EXPLORATION

PHILIP SERVICES CORP.

000 Moriroe Road nington, New Mexico 87401 5) 326-2262 FAX (505) 326-2388

Project Number	19643	Phase	1001.77
Project Name	EPFS PITS	>10	
Project Location	TONKIN	No. I	90-467

Elevation

Borehole Location LTR: O S: 18 T: 24 R: 3

GWL Depth
Drilled By
Well Logged By
Date Started
Date Completed

Elevation

AA

K. PADILLA- (. Lovato

C. CHANCE

8/3/98

8/3/98

Drilling Method 4 1/4 ID HSA
Air Monitoring Method PID

			-							
D		١	Sample	S		Depth				
Depth	Sample	Sample	Type &	Sample Description	USCS	Lithology		r Monito	-	Drilling Conditions
(Feet)	Number	Interval	Recovery	Classification System: USCS	Symbol	Change		Inits: Pi		& Blow Counts
 0		 -	(inches)			(feet)	BZ	BH	S/HS	-
I "							i		1	8Z=Breathing Zone
1 -						ľ	ŀ			BH=Borehole
I ├ -										S/HS=Sample/Headspace
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Geologist Signature

Cong Chance



GAS CHROMOTOGRAPHY RESULTS

TEST

: EPA 8015 MODIFIED (DIRECT INJECT)

CLIENT

: EL PASO FIELD SERVICES

PINNACLE I.D.: 808033

PROJECT#

: (none)

PROJECT NAME

: PHASE II DRILLING

		· · · · · · · · · · · · · · · · · · ·						
SAMPLE	· · · · · · · · · · · · · · · · · · ·			DATE	DATE	DATE	DIL.	
ID.#	CLIENT I.D.		MATRIX	SAMPLED	EXTRACTED	ANALYZED	FACTOR	
01	980539		NON-AQ	8/3/98	8/13/98	8/14/98	1	
02	980540		NON-AQ	8/3/98	8/13/98	8/14/98	1	
03	980559		NON-AQ	8/6/98	8/13/98	8/14/98	1	*
PARAME	TER	DET. LIMIT	UN	IITS	01	· 02	03	
FUEL HY	DROCARBONS, C6-C10	10	MG	S/KG	< 10	< 10	< 10	
FUEL HY	DROCARBONS, C10-C22	5.0	· MG	KG	22 ·	< 5.0	5.4	
FUEL HY	DROCARBONS, C22-C36	5.0	MG	/KG	15	< 5.0	8.4	
JL	ATED SUM:				37		13.8	
SURROG						•		
O-TERPH	IENYL (%)				107	95	104	٠.
SURROG	ATE LIMITS	(66 - 151)						

CHEMIST NOTES: N/A

Phone: 505-344-3777, Fax: 505-344-4413



GAS CHROMOTOGRAPHY RESULTS

TEST

: EPA 8015 MODIFIED (DIRECT INJECT)

CLIENT

: EL PASO FIELD SERVICES

PINNACLE I.D.: 808033

PROJECT#

: (none)

PROJECT NAME

: PHASE II DRILLING

SAMPLE				DATE	DATE	DATE	DIL.
ID.#	CLIENT I.D.		MATRIX	SAMPLED	EXTRACTED	ANALYZED	FACTOR
04	980560		NON-AQ	8/6/98	8/13/98	8/14/98	1
05	980561		NON-AQ	8/7/98	8/13/98	8/14/98	1
PARAMET	TER	DET. LIMIT	UN	IITS	04	05	
FUEL HY	DROCARBONS, C6-C10	10	MG	6/KG	< 10	< 10	
FUEL HYI	DROCARBONS, C10-C22	5.0	MG	/KG	< 5.0	< 5.0	
FUEL HY	DROCARBONS, C22-C36	5.0	MG	KG	< 5.0	< 5.0	
COULA	ATED SUM:		:				
SURROGA	ATE:					,	
O-TERPH	ENYL (%)				91	91	
SURROGA	ATE LIMITS	(66 - 151)					

CHEMIST NOTES: N/A

Phone: 505-344-3777, Fax: 505-344-4413

PROJECT MANAGER:

Materia Marchael Cale (Minus Metals: RCRA Metals by TCLP (Method 1311) i i Date: (8) slateM ARDA Target Analyte List Metals (23) Priority Pollutant Metals (13) Printed Name. Signature: Company: General Chemistry: Polynuclear Aromatics (610/8310) 1330 Base/Neutral/Acid Compounds GC/MS (625/8270) Herbicides (615/8151) Pesticides /PCB (608/8081) Date: Ē 8260 (Landfill) Volatile Organics 8260 (CUST) Volatile Organics 8260 (Full) Volatile Organics Printed Name: Signature: Сотралу: 8260 (TCL) Volatile Organics 504.1 ED8 □ \ D8CP □ NORMAL) (TSUO) 1508 (HALO) 80S1 (EDX) (TCL) 1S08 □ OTHER 8021 (BTEX) TIMBE TIMB PCE 8021 (BTEX)/8015 (Gasoline) M8015) Gas/Purge & Trap ☐ SDWA (MOD.8015) Diesel/Direct Inject O 1 WEEK HAAT Petroleum Hydrocarbons (418.1) 6 (RUSH) [] 24hr | 48hr | 72hr 87401 CERTIFICATION REQUIRED: | INM COMMENTS: FIXED FEE METHANOL PRESERVATION [] DASO Field Services Soil Ş, So. LAmbdin 1150 558 2144 770 W. NAVAJO 8/3/8 8/7/8 Earming ton, 8/3/98 John PROJ. NAME: Phase IL Orilling A bove 980560 (505) 980559 980840 980539 98056 口 SHIPPED VIA: FED EX COMPANY: ADDRESS: COMPANY: ADDRESS: BILL TO: PHONE: FAX: PROJ. NO.: P.O. NO.:

SON SON SON THE STATE OF THE SON

1/5/98 AEN Inc.: American Environmental Network (NM), Inc. • 2709-D Pan American Freeway, NE • Albuquerque, New Mexico 87107 • (505) 344-3777 • Fax (505) 344-4413

PLEASE FILL THIS FORM IN COMPLETELY.

DISTRIBUTION: White - AEN, Canary - Origina

BTEX SOIL SAMPLE WORKSHEET

File		:	980540	Date Printed :	8/12/98
Soil Mass	(g)	:	5.11	Multiplier (L/g) :	0.00098
Extraction vol.	(mL)	:	10	CAL FACTOR (Analytical):	200
Shot Volume	(uL)	:	50	CAL FACTOR (Report):	0.19569

		DILUTION	FACTOR:	1	Det. Limit
Benzen e	(ug/L) : <0.5	Benzene	(mg/Kg):	#VALUE!	0.489
Toluene	(ug/L) : < 0.5	Toluene	(mg/Kg):	#VALUE!	0.489
Ethylbenzene	(ug/L) : <0.5	Ethylbenzen e	(mg/Kg):	#VALUE!	0.489
p & m-xylene	(ug/L) : <1.0	p & m-xylene	(mg/Kg):	#VALUE!	0.978
o-xylene	(ug/L) : < 0.5	o-xylene	(mg/Kg):	#VALUE!	0.489
		Total xylenes	(mg/Kg):	#VALUE!	1.468
		Total BTEX	(ma/Ka):	#VALUE!	

RECORD OF SUBSURFACE EXPLORATION

PHILIP SERVICES CORP.

4000 Monroe Road ington, New Mexico 87401 326-2262 FAX (505) 326-2388

Boreho	le#	вн-	1	
Well#		NA	<u> </u>	
Page	1	of	J	

Project Number 19643 Phase 1001.77
Project Name EPFS PITS >10
Project Location TCNKIN No. 1 90 - 467

Elevation

Date Completed

Borehole Location LTR: O S: 18 T: 24 R: 3

GWL Depth
Drilled By
Well Logged By
Date Started

WA

C. CHANCE

8/3/98

Drilling Method 4 1/4 ID HSA Air Monitoring Method PID

				1						
Depth (Feet)	Sample Number	Sample Interval	Sample Type & Recovery (inches)	Sample Description Classification System: USCS	USCS Symbol	Depth Lithology Change (feet)		r Monito Inits: Pl BH	-	Drilling Conditions & Blow Counts
5										BZ=Breathing Zone BH=Borehole S/HS=Sample/Headspace
10			·	Pit excovated to 12 feet						
15 - - - - 20	١	15-17	19	OK by silty CLAY, med stiff, med plastic, dry It bo sandy SICT, to FSAnd, 10054, dry It bo silty SAND, vf SAND 10054, dry 10054, dry			٥	10	00	
25 25				TOB 22'			U	0	2/0	- 1558 An
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Geologist Signature

Con Chance