

AP - 17

**STAGE 2
WORKPLANS**

Date:

10-17-13

Hansen, Edward J., EMNRD

From: Camille Bryant <cbryant@novatraining.cc>
Sent: Thursday, October 17, 2013 2:08 PM
To: Hansen, Edward J., EMNRD
Cc: jpdann@paalp.com
Subject: Plains TNM 97-17 Release Site (AP-017)
Attachments: 10813 Report.pdf

Mr. Hansen,

As per our phone conversation on October 7, 2013, regarding soil activities to be conducted at the Plains TNM 97-17 Release Site (AP-017), Nova Safety & Environmental, on behalf of Plains, purposes to apply three (3) feet of soil from the surrounding area to the surface of the previously backfilled excavation. The native sand dunes surrounding the site will be utilized to apply the additional three (3) feet of cover to the excavated area. A soil sample (Background) was collected from the native soil and submitted to TraceAnalysis, Inc. for TPH analysis. Laboratory analytical results indicated the soil sample exhibited a TPH concentration of 52.6 mg/Kg. The laboratory report is attached. NOVA will commence with the described activities on Monday, October 21. On completion of soil activities the disturbed areas will be re-vegetated with a seed mixture approved by the landowner. Please contact me with any questions.

Thank you,

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Certifications

WBE HUB NCTRCA DBE NELAP DoD LELAP Kansas Oklahoma ISO 17025

Analytical and Quality Control Report

Camille Bryant
 Nova Safety & Environmental
 2057 Commerce St.
 Midland, TX, 79703

Report Date: October 17, 2013

Work Order: 13100921



Project Location: Eunice, NM
 Project Name: 97-17
 Project Number: TNM 97-17
 SRS #: TNM 97-17

Enclosed are the Analytical Report and Quality Control Report for the following sample(s) submitted to TraceAnalysis, Inc.

| Sample | Description | Matrix | Date Taken | Time Taken | Date Received |
|--------|-------------|--------|------------|------------|---------------|
| 343545 | Background | soil | 2013-10-08 | 11:00 | 2013-10-09 |

These results represent only the samples received in the laboratory. The 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.

This report consists of a total of 11 pages and shall not be reproduced except in its entirety, without written approval of TraceAnalysis, Inc.

Dr. Blair Leftwich, Director
 Dr. Michael Abel, Project Manager

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Case Narrative

Samples for project 97-17 were received by TraceAnalysis, Inc. on 2013-10-09 and assigned to work order 13100921. Samples for work order 13100921 were received intact at a temperature of 5.0 C.

Samples were analyzed for the following tests using their respective methods.

| Test | Method | Prep Batch | Prep Date | QC Batch | Analysis Date |
|---------------|----------|------------|---------------------|----------|---------------------|
| TPH DRO - NEW | S 8015 D | 89771 | 2013-10-15 at 12:00 | 105994 | 2013-10-16 at 11:21 |
| TPH GRO | S 8015 D | 89670 | 2013-10-11 at 08:40 | 105913 | 2013-10-11 at 06:15 |

Results for these samples are reported on a wet weight basis unless data package indicates otherwise.

A matrix spike (MS) and matrix spike duplicate (MSD) sample is chosen at random from each preparation batch. The MS and MSD will indicate if a site specific matrix problem is occurring, however, it may not pertain to the samples for work order 13100921 since the sample was chosen at random. Therefore, the validity of the analytical data reported has been determined by the laboratory control sample (LCS) and the method blank (MB). These quality control measures are performed with each preparation batch to ensure data integrity.

All other exceptions associated with this report have been footnoted on the appropriate analytical page to assist in general data comprehension. Please contact the laboratory directly if there are any questions regarding this project.

Analytical Report

Sample: 343545 - Background

| | | |
|-------------------------|--------------------------------|------------------|
| Laboratory: Midland | Analytical Method: S 8015 D | Prep Method: N/A |
| Analysis: TPH DRO - NEW | Date Analyzed: 2013-10-16 | Analyzed By: KC |
| QC Batch: 105994 | Sample Preparation: 2013-10-15 | Prepared By: KC |
| Prep Batch: 89771 | | |

| Parameter | Flag | Cert | RL Result | Units | Dilution | RL |
|-----------|------|------|--------------|-------|----------|------|
| DRO | B | 1 | 52.6 | mg/Kg | 1 | 50.0 |

| Surrogate | Flag | Cert | Result | Units | Dilution | Spike Amount | Percent Recovery | Recovery Limits |
|-------------|------|------|--------|-------|----------|-----------------|---------------------|--------------------|
| n-Tricosane | | | 118 | mg/Kg | 1 | 100 | 118 | 76.3 - 192.6 |

Sample: 343545 - Background

| | | |
|---------------------|--------------------------------|---------------------|
| Laboratory: Midland | Analytical Method: S 8015 D | Prep Method: S 5035 |
| Analysis: TPH GRO | Date Analyzed: 2013-10-11 | Analyzed By: AK |
| QC Batch: 105913 | Sample Preparation: 2013-10-11 | Prepared By: AK |
| Prep Batch: 89670 | | |

| Parameter | Flag | Cert | RL Result | Units | Dilution | RL |
|-----------|------|------|--------------|-------|----------|------|
| GRO | U | 1 | <4.00 | mg/Kg | 1 | 4.00 |

| Surrogate | Flag | Cert | Result | Units | Dilution | Spike Amount | Percent Recovery | Recovery Limits |
|------------------------------|------|------|--------|-------|----------|-----------------|---------------------|--------------------|
| Trifluorotoluene (TFT) | | | 1.63 | mg/Kg | 1 | 2.00 | 82 | 70 - 130 |
| 4-Bromofluorobenzene (4-BFB) | | | 2.53 | mg/Kg | 1 | 2.00 | 126 | 70 - 130 |

Method Blanks

Method Blank (1) QC Batch: 105913

QC Batch: 105913 Date Analyzed: 2013-10-11 Analyzed By: AK
Prep Batch: 89670 QC Preparation: 2013-10-11 Prepared By: AK

| Parameter | Flag | Cert | MDL Result | Units | RL |
|-----------|------|------|---------------|-------|----|
| GRO | | 1 | <2.32 | mg/Kg | 4 |

| Surrogate | Flag | Cert | Result | Units | Dilution | Spike Amount | Percent Recovery | Recovery Limits |
|------------------------------|------|------|--------|-------|----------|-----------------|---------------------|--------------------|
| Trifluorotoluene (TFT) | | | 2.01 | mg/Kg | 1 | 2.00 | 100 | 70 - 130 |
| 4-Bromofluorobenzene (4-BFB) | | | 2.31 | mg/Kg | 1 | 2.00 | 116 | 70 - 130 |

Method Blank (1) QC Batch: 105994

QC Batch: 105994 Date Analyzed: 2013-10-16 Analyzed By: KC
Prep Batch: 89771 QC Preparation: 2013-10-15 Prepared By: KC

| Parameter | Flag | Cert | MDL Result | Units | RL |
|-----------|------|------|---------------|-------|----|
| DRO | | 1 | 10.4 | mg/Kg | 50 |

| Surrogate | Flag | Cert | Result | Units | Dilution | Spike Amount | Percent Recovery | Recovery Limits |
|-------------|------|------|--------|-------|----------|-----------------|---------------------|--------------------|
| n-Tricosane | | | 95.2 | mg/Kg | 1 | 100 | 95 | 64.1 - 164.4 |

Laboratory Control Spikes

Laboratory Control Spike (LCS-1)

QC Batch: 105913
Prep Batch: 89670

Date Analyzed: 2013-10-11
QC Preparation: 2013-10-11

Analyzed By: AK
Prepared By: AK

| Param | F | C | LCS Result | Units | Dil. | Spike Amount | Matrix Result | Rec. | Rec. Limit |
|-------|---|---|---------------|-------|------|-----------------|------------------|------|---------------|
| GRO | | 1 | 19.6 | mg/Kg | 1 | 20.0 | <2.32 | 98 | 70 - 130 |

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

| Param | F | C | LCSD Result | Units | Dil. | Spike Amount | Matrix Result | Rec. | Rec. Limit | RPD | RPD Limit |
|-------|---|---|----------------|-------|------|-----------------|------------------|------|---------------|-----|--------------|
| GRO | | 1 | 18.6 | mg/Kg | 1 | 20.0 | <2.32 | 93 | 70 - 130 | 5 | 20 |

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

| Surrogate | LCS Result | LCSD Result | Units | Dil. | Spike Amount | LCS Rec. | LCSD Rec. | Rec. Limit |
|------------------------------|---------------|----------------|-------|------|-----------------|-------------|--------------|---------------|
| Trifluorotoluene (TFT) | 2.03 | 1.92 | mg/Kg | 1 | 2.00 | 102 | 96 | 70 - 130 |
| 4-Bromofluorobenzene (4-BFB) | 2.14 | 2.28 | mg/Kg | 1 | 2.00 | 107 | 114 | 70 - 130 |

Laboratory Control Spike (LCS-1)

QC Batch: 105994
Prep Batch: 89771

Date Analyzed: 2013-10-16
QC Preparation: 2013-10-15

Analyzed By: KC
Prepared By: KC

| Param | F | C | LCS Result | Units | Dil. | Spike Amount | Matrix Result | Rec. | Rec. Limit |
|-------|---|---|---------------|-------|------|-----------------|------------------|------|---------------|
| DRO | | 1 | 267 | mg/Kg | 1 | 250 | 10.4 | 103 | 53.8 - 129 |

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

| Param | F | C | LCSD Result | Units | Dil. | Spike Amount | Matrix Result | Rec. | Rec. Limit | RPD | RPD Limit |
|-------|---|---|----------------|-------|------|-----------------|------------------|------|---------------|-----|--------------|
| DRO | | 1 | 280 | mg/Kg | 1 | 250 | 10.4 | 108 | 53.8 - 129 | 5 | 20 |

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

| Surrogate | LCS Result | LCSD Result | Units | Dil. | Spike Amount | LCS Rec. | LCSD Rec. | Rec. Limit |
|-------------|---------------|----------------|-------|------|-----------------|-------------|--------------|---------------|
| n-Tricosane | 107 | 107 | mg/Kg | 1 | 100 | 107 | 107 | 61.3 - 170.4 |

Calibration Standards

Standard (CCV-1)

QC Batch: 105913

Date Analyzed: 2013-10-11

Analyzed By: AK

| Param | Flag | Cert | Units | CCVs True Conc. | CCVs Found Conc. | CCVs Percent Recovery | Percent Recovery Limits | Date Analyzed |
|-------|------|------|-------|-----------------------|------------------------|-----------------------------|-------------------------------|------------------|
| GRO | | 1 | mg/Kg | 1.00 | 1.02 | 102 | 80 - 120 | 2013-10-11 |

Standard (CCV-2)

QC Batch: 105913

Date Analyzed: 2013-10-11

Analyzed By: AK

| Param | Flag | Cert | Units | CCVs True Conc. | CCVs Found Conc. | CCVs Percent Recovery | Percent Recovery Limits | Date Analyzed |
|-------|------|------|-------|-----------------------|------------------------|-----------------------------|-------------------------------|------------------|
| GRO | | 1 | mg/Kg | 1.00 | 0.955 | 96 | 80 - 120 | 2013-10-11 |

Standard (CCV-1)

QC Batch: 105994

Date Analyzed: 2013-10-16

Analyzed By: KC

| Param | Flag | Cert | Units | CCVs True Conc. | CCVs Found Conc. | CCVs Percent Recovery | Percent Recovery Limits | Date Analyzed |
|-------|------|------|-------|-----------------------|------------------------|-----------------------------|-------------------------------|------------------|
| DRO | | 1 | mg/Kg | 250 | 268 | 107 | 80 - 120 | 2013-10-16 |

Standard (CCV-2)

QC Batch: 105994

Date Analyzed: 2013-10-16

Analyzed By: KC

| Param | Flag | Cert | Units | CCVs True Conc. | CCVs Found Conc. | CCVs Percent Recovery | Percent Recovery Limits | Date Analyzed |
|-------|------|------|-------|-----------------------|------------------------|-----------------------------|-------------------------------|------------------|
| DRO | | 1 | mg/Kg | 250 | 276 | 110 | 80 - 120 | 2013-10-16 |

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Standard (CCV-3)

QC Batch: 105994

Date Analyzed: 2013-10-16

Analyzed By: KC

| Param | Flag | Cert | Units | CCVs True Conc. | CCVs Found Conc. | CCVs Percent Recovery | Percent Recovery Limits | Date Analyzed |
|-------|------|------|-------|-----------------------|------------------------|-----------------------------|-------------------------------|------------------|
| DRO | | 1 | mg/Kg | 250 | 277 | 111 | 80 - 120 | 2013-10-16 |

Standard (CCV-4)

QC Batch: 105994

Date Analyzed: 2013-10-16

Analyzed By: KC

| Param | Flag | Cert | Units | CCVs True Conc. | CCVs Found Conc. | CCVs Percent Recovery | Percent Recovery Limits | Date Analyzed |
|-------|------|------|-------|-----------------------|------------------------|-----------------------------|-------------------------------|------------------|
| DRO | | 1 | mg/Kg | 250 | 285 | 114 | 80 - 120 | 2013-10-16 |

Appendix

Report Definitions

| Name | Definition |
|------|----------------------------|
| MDL | Method Detection Limit |
| MQL | Minimum Quantitation Limit |
| SDL | Sample Detection Limit |

Laboratory Certifications

| C | Certifying Authority | Certification Number | Laboratory Location |
|---|----------------------|----------------------|---------------------|
| - | NCTRCA | WFWB384444Y0909 | TraceAnalysis |
| - | DBE | VN 20657 | TraceAnalysis |
| - | HUB | 1752439743100-86536 | TraceAnalysis |
| - | WBE | 237019 | TraceAnalysis |
| 1 | NELAP | T104704392-12-4 | Midland |

Standard Flags

| F | Description |
|-----|---|
| B | Analyte detected in the corresponding method blank above the method detection limit |
| H | Analyzed out of hold time |
| J | Estimated concentration |
| Jb | The analyte is positively identified and the value is approximated between the SDL and MQL. Sample contains less than ten times the concentration found in the method blank. The result should be considered non-detect to the SDL. |
| Je | Estimated concentration exceeding calibration range. |
| MI1 | Split peak or shoulder peak |
| MI2 | Instrument software did not integrate |
| MI3 | Instrument software misidentified the peak |
| MI4 | Instrument software integrated improperly |
| MI5 | Baseline correction |
| Qc | Calibration check outside of laboratory limits. |
| Qr | RPD outside of laboratory limits |
| Qs | Spike recovery outside of laboratory limits. |
| Qsr | Surrogate recovery outside of laboratory limits. |
| U | The analyte is not detected above the SDL |

Attachments

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The scanned attachments will follow this page.
Please note, each attachment may consist of more than one page.

