

1R - 427-357

APPROVALS

YEAR(S):

2013

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, May 29, 2013 2:31 PM
To: Hack Conder (hconder@riceswd.com)
Cc: Leking, Geoffrey R, EMNRD; Laura Pena (lpena@riceswd.com); Katie Jones <kjones@riceswd.com> (kjones@riceswd.com); Scott Curtis (scurtis@riceswd.com)
Subject: Remediation Plan (1R427-357) Termination - ROC EME C-10-1 EOL Site

**RE: Termination Request
for the Rice Operating Company's
EME C-10-1 EOL Site
Unit Letter C, Section 10, T21S, R36E, NMPM, Lea County, New Mexico
Remediation Plan (1R427-357) Termination**

Dear Mr. Conder:

The New Mexico Oil Conservation Division (OCD) has received Rice Operating Company's report and request to close the above-referenced site, dated May 8, 2013 (received May 20, 2013) and additional information of May 29, 2013. The reports are acceptable to the OCD.

The above-referenced report, submitted in accordance with 19.15.29 NMAC (Rule 29; formally, Rule 116), indicates that Rice Operating Company has met the requirements of 19.15.29 NMAC; therefore, the OCD approves the report and hereby notifies you that the remediation plan (1R427-357) is terminated in accordance with 19.15.29 NMAC.

Please be advised that OCD approval of this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have any questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

RICE *Operating Company*

122 West Taylor • Hobbs, New Mexico 88240

Phone: (575) 393-9174 • Fax: (575) 397-1471

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 9231

RECEIVED

MAY 20 2013

May 8, 2013

Mr. Edward Hansen
New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

RE: Termination Request
EME C-10-1 EOL (1R427-357): UL/C, Sec. 10, T21S, R36E
RICE Operating Company – Eunice Monument Eumont SWD System

Mr. Hansen:

Rice Operating Company (ROC) is the service provider (agent) for the EME Saltwater Disposal (SWD) System and has no ownership of any portion of the pipeline, well, or facility. The System is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

Background

In 2010, ROC initiated work on the former C-10-1 EOL junction box. The site is located in UL/C, Sec. 10, T21S, R36E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 200 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 10x10x12 ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in chloride concentrations that decreased with depth and low PID readings. The excavated soil was blended on site and representative composite samples of the excavation walls, bottom and blended backfill were sent to a commercial for analysis of chloride and TPH, resulting in a 4-wall chloride concentration of 448 mg/kg and concentrations of gasoline range organics (GRO) concentration and diesel range organics (DRO) below detectable limits. The bottom composite resulted in a chloride concentration of 272 mg/kg and concentrations of GRO and DRO below detectable limits. The blended backfill resulted in a chloride concentration of 32 mg/kg and concentrations of GRO and DRO below detectable limits. The excavation was backfilled with the excavated soil to 2 ft below ground surface. The remaining excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. On 10/15/2010, the site was seed with a blend of native vegetation.

On 4/3/2013, soil amendments were added to the site and the site was reseeded with a blend of native vegetation. Vegetation will act as an evapo-transpiration barrier that will also inhibit the downward migration of chlorides and hydrocarbons. Plants capture water through their roots and so reduce the amount of water infiltrating below the root zone. The site revegetation form and photos of these activities are attached.

The junction box site location map, area map, final report, photodocumentation, laboratory analysis, PID sheet, chloride graph, revegetation form and seeding photodocumentation are attached.

Recommendations

Site investigation demonstrates that residual chloride and hydrocarbons in the vadose zone will not with reasonable probability contaminate groundwater in excess of NMOCD standards. This site meets the requirements of the NMOCD-approved Revised Junction Box Upgrade Work Plan (July 16, 2003). As such, ROC request termination of the regulatory file, or similar closure status.

Please contact me at (575)393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

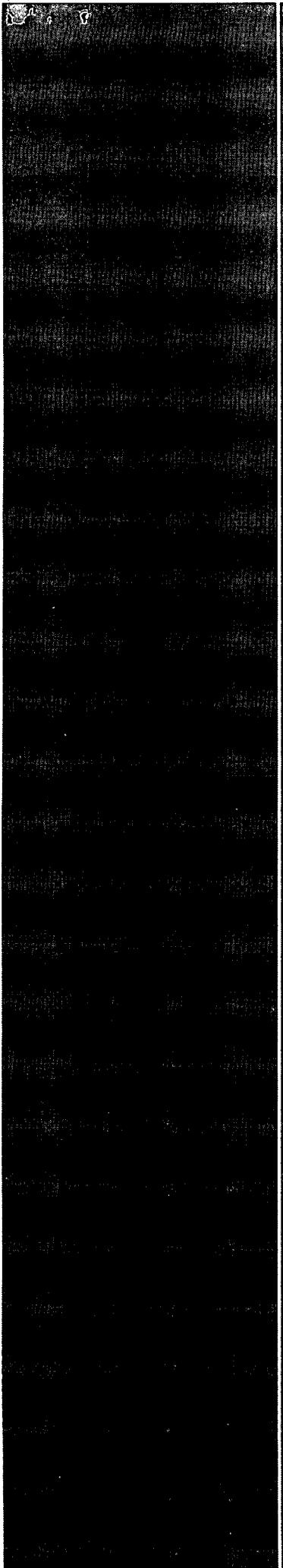
Sincerely,
RICE Operating Company



Hack Conder
Environmental Manager

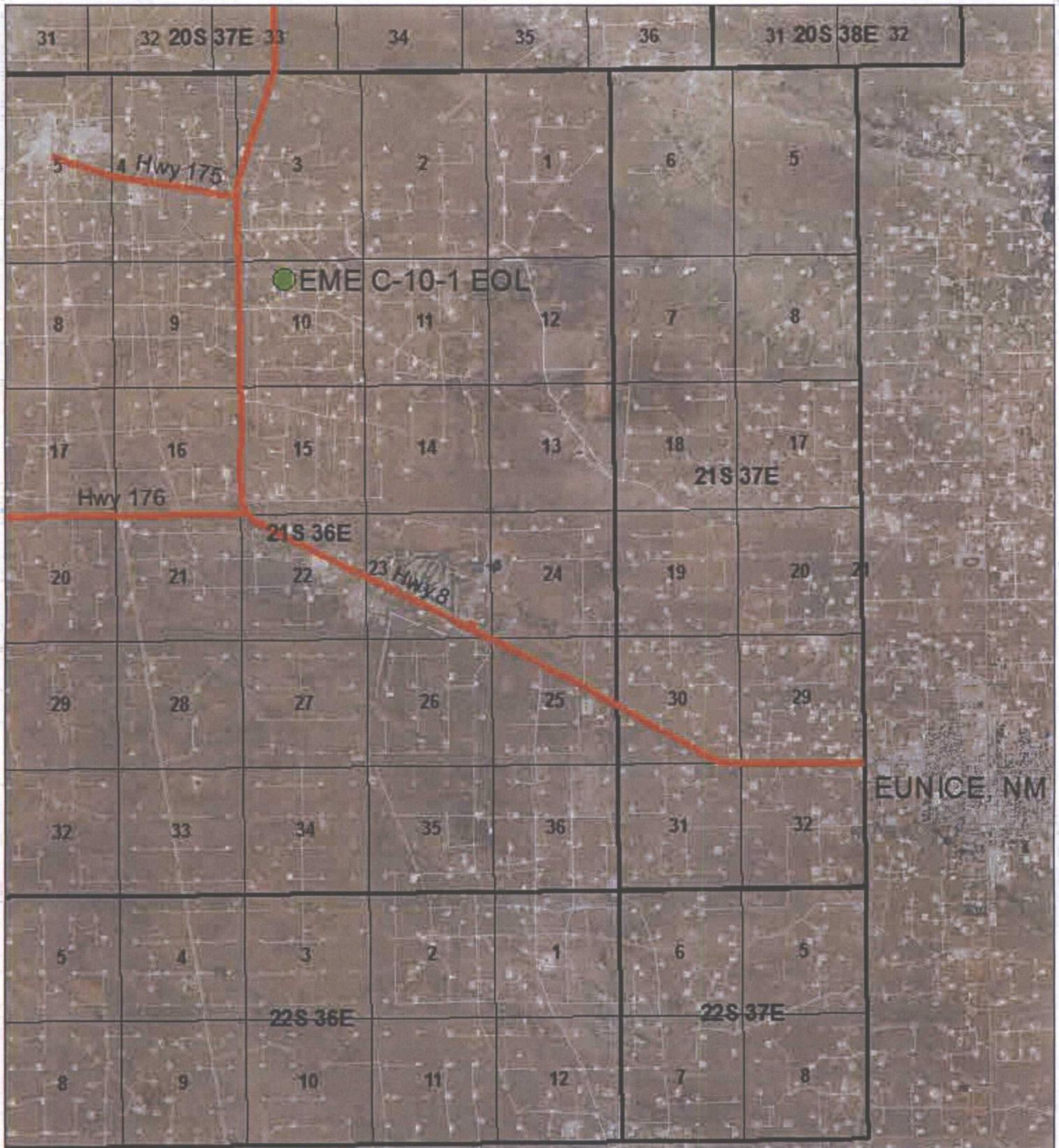
enclosures

RECEIVED OOD
2013 MAY 17 P 2:25



Site Maps

RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471



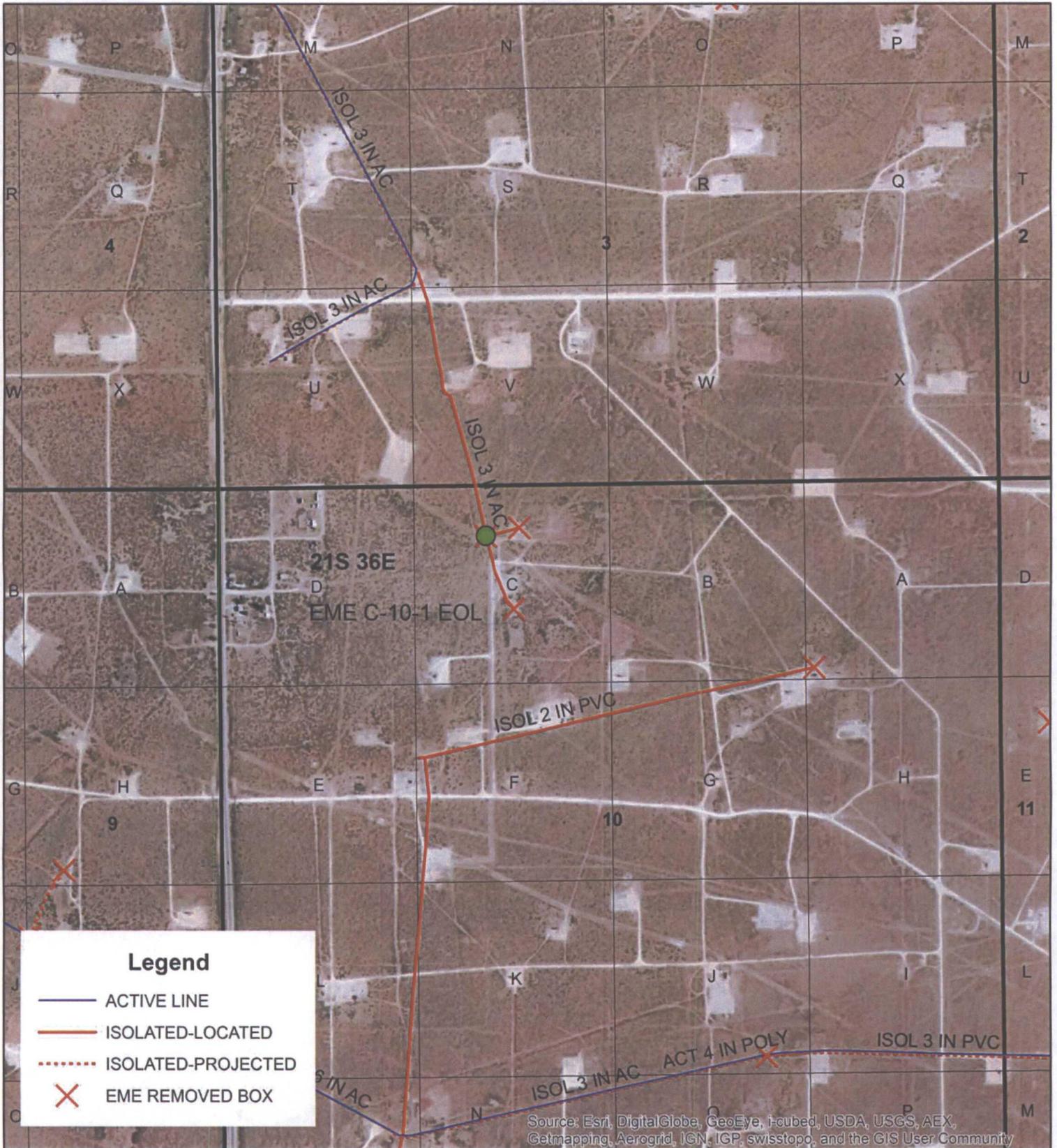
**EME
C-10-1 EOL**

UL C SECTION 10
T-21-S R-36-E
LEA COUNTY, NM



Drawing date: 1/21/13
Drafted by: Tony Grieco

Area Map



Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Legend

- ACTIVE LINE
- ISOLATED-LOCATED
- ISOLATED-PROJECTED
- X EME REMOVED BOX



EME
EOL C-10-1
 UL/C SECTION 10
 T-21-S R-36-E
 LEA COUNTY, NM

NMOCD CASE #: 1R427-357

0 490 980

Feet

Drawing date: 4/25/13
 Drafted by: T. Grieco

Junction Box Report

RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
							Length	Width	Depth
Eunice Monument Eumont	C-10-1 EOL	C	10	21S	36E	Lea	Eliminated		

LAND TYPE: BLM _____ STATE _____ FEE LANDOWNER Millard Deck OTHER _____

Depth to Groundwater 200 feet: NMOCD SITE ASSESSMENT RANKING SCORE: 0

Date Started 9/14/2010 Date Completed 10/15/2010 OCD Witness no

Soil Excavated 44.4 cubic yards. Excavation Length 10 Width 10 Depth 12 feet

Soil Disposed 0 cubic yards Offsite Facility n/a Location n/a

FINAL ANALYTICAL RESULTS: Sample Date 9/29/2010 Sample Depth 12 ft.

Procure 5-point composite sample of bottom and 4-point composite sample of sidewalls. TPH and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
4-WALL COMP.	2.4	<10.0	<10.0	448
BOTTOM COMP.	0.6	<10.0	<10.0	272
BACKFILL COMP.	1.8	<10.0	<10.0	32

CHLORIDE FIELD TESTS

LOCATION	DEPTH	mg/kg
4-wall comp.	n/a	403
bottom comp.	12'	207
backfill comp.	n/a	200
vertical delineation trench 5 ft. north of junction (source)	2'	117
	4'	511
	6'	533
	8'	502
	10'	490
	12'	294

General Description of Remedial Action: This junction and line were eliminated during the pipeline replacement/upgrade program. After the former junction box was removed, an investigation was conducted using a backhoe to collect soil samples at regular intervals producing a 10X10X12-ft-deep excavation. Chloride field test performed on each sample yielded concentrations that related with depth.

Organic vapors were measured using a PID. The excavated soil was blended on site and representative composite samples were collected from the blended backfill, the bottom of the excavation, and the excavation walls. The representative samples were sent to a commercial laboratory for analysis of chloride and TPH. The blended backfill was returned to the excavation to 2 ft. below ground surface. The remaining excavation was backfilled with clean imported soil to ground surface and contoured to the surrounding area. On 10/15/2010, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

enclosures: photos, lab results, PID (field) screenings, chloride curve

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

SITE SUPERVISOR Dak Harris SIGNATURE *Dak Harris* COMPANY RICE OPERATING COMPANY

REPORT ASSEMBLED BY Zach Conder INITIAL *ZC*

PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE *Larry Bruce Baker Jr.* DATE 3-29-11

EME C-10-1 EOL

Unit C, Section 10, T21S, R36E



Site prior to excavation

9/14/2010



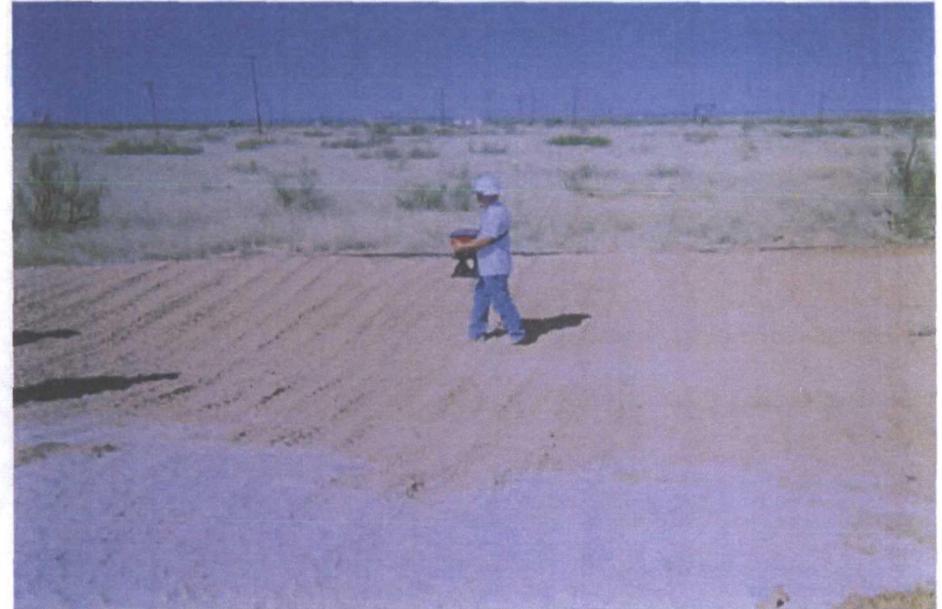
Collecting Sample

9/29/2010



Backfilling site

10/27/2010



Seeding site

10/27/2010

Analytical Results For:

Rice Operating Company
Bruce Baker
112 W. Taylor
Hobbs NM, 88240
Fax To: (575) 397-1471

Received:	09/29/2010	Sampling Date:	09/29/2010
Reported:	10/05/2010	Sampling Type:	Soil
Project Name:	EME C-10-1 EOL (21/36)	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: 5 PT. BOTTOM @ 12' (H020951-01)

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	272	16.0	09/30/2010	ND	400	100	400	7.69		
TPH 8015M		mg/kg		Analyzed By: AB						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	10/01/2010	ND	186	93.1	200	6.49		
DRO >C10-C28	<10.0	10.0	10/01/2010	ND	199	99.6	200	15.1		
<i>Surrogate: 1-Chlorooctane</i>	87.3 %	70-130								
<i>Surrogate: 1-Chlorooctadecane</i>	86.7 %	70-130								

Sample ID: 4-WALL COMPOSITE @ 10 X 10 (H020951-02)

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	448	16.0	09/30/2010	ND	400	100	400	7.69		
TPH 8015M		mg/kg		Analyzed By: AB						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	10/01/2010	ND	186	93.1	200	6.49		
DRO >C10-C28	<10.0	10.0	10/01/2010	ND	199	99.6	200	15.1		
<i>Surrogate: 1-Chlorooctane</i>	92.5 %	70-130								
<i>Surrogate: 1-Chlorooctadecane</i>	92.3 %	70-130								

COPY

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

Rice Operating Company
Bruce Baker
112 W. Taylor
Hobbs NM, 88240
Fax To: (575) 397-1471

Received:	09/29/2010	Sampling Date:	09/29/2010
Reported:	10/05/2010	Sampling Type:	Soil
Project Name:	EME C-10-1 EOL (21/36)	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: BLENDED BACKFILL (H020951-03)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	09/30/2010	ND	400	100	400	7.69	
TPH 8015M		mg/kg		Analyzed By: AB					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	10/01/2010	ND	186	93.1	200	6.49	
DRO >C10-C28	<10.0	10.0	10/01/2010	ND	199	99.6	200	15.1	
<i>Surrogate: 1-Chlorooctane</i>		<i>89.6 %</i>	<i>70-130</i>						
<i>Surrogate: 1-Chlorooctadecane</i>		<i>91.1 %</i>	<i>70-130</i>						

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Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603
 (505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325)673-7020

Company Name: <u>Rice Operating Company</u>		BILL TO		ANALYSIS REQUEST											
Project Manager: <u>Bruce Baker</u>		P.O. #:													
Address: <u>122 W. Taylor</u>		Company:													
City: <u>Hobbs</u> State: <u>NM</u> Zip: <u>88240</u>		Attn:													
Phone #: <u>575-393-9174</u> Fax #: <u>575-397-1471</u>		Address:													
Project #: _____ Project Owner: _____		City:													
Project Name: <u>EMEC-10-1 EOR (21/30)</u>		State: _____ Zip: _____													
Project Location: _____		Phone #:													
Sampler Name: <u>Robert Legans</u>		Fax #:													

Lab I.D.	Sample I.D.	GRAB OR (C)OMP.	# CONTAINERS	MATRIX					PRESERV		SAMPLING		DATE	TIME	TPH	CLF
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER	ACID/BASE	ICE/COOL	OTHER				
192095-1	3pt Bottom @ 12'	C	1									9-29-10	10:15			
2	7' Well - composite @ 10-10	C	1									9-29-10	7:50			
3	Branded Back Fill	C	1									9-29-10	7:33			

COPY

PI FARE 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.

Relinquished By: <u>Robert</u>	Date: _____	Received By: _____	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #: _____
Relinquished By: _____	Time: _____	Received By: _____	Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #: _____
Delivered By: (Circle One) Sampler <input checked="" type="checkbox"/> UPS <input type="checkbox"/> Bus <input type="checkbox"/> Other:	Date: <u>9/29/10</u>	Received By: <u>Andi Benson</u>	REMARKS: <u>E-Mail Results to:</u> <u>R. Legans @ RiceSun.com</u> <u>B. Baker " " "</u> <u>Legans " " "</u>	
Sample Condition Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/> <input type="checkbox"/> Yes <input type="checkbox"/> No	Time: <u>9:40</u>	Checked By: <u>GA</u>		

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

#26

RICE OPERATING COMPANY

122 West Taylor Hobbs, NM 88240
 PHONE: (505) 393-9174 FAX: (505) 397-1471
 PID METER CALIBRATION & FIELD REPORT FORM

CK.
 MODEL
 NO.

✓

MODEL: PGM 7300 SERIAL NO: 590-000508
 MODEL: PGM 7300 SERIAL NO: 590-000504
 MODEL: PGM 7320 SERIAL NO: 592-903318
 MODEL: PGM 7300 SERIAL NO: 590-000183

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 995691	EXPIRATION DATE: 9-27-13
METER READING ACCURACY: 99.9	

ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWN SHIP	RANGE
EME	C-10-1EOL	C	10	21	36

SAMPLE ID	PID	SAMPLE ID	PID
Bottom 5 ft. Comp @ 12'	0.6		
Blended backfill	1.8		
4-Wall Composite	0.4		

COPY

I verify that I have calibrated the above instrument in accordance to the manufacture operation manual.

SIGNATURE: *Dab Favis*

DATE: 9-29-10

CHLORIDE CONCENTRATION CURVE

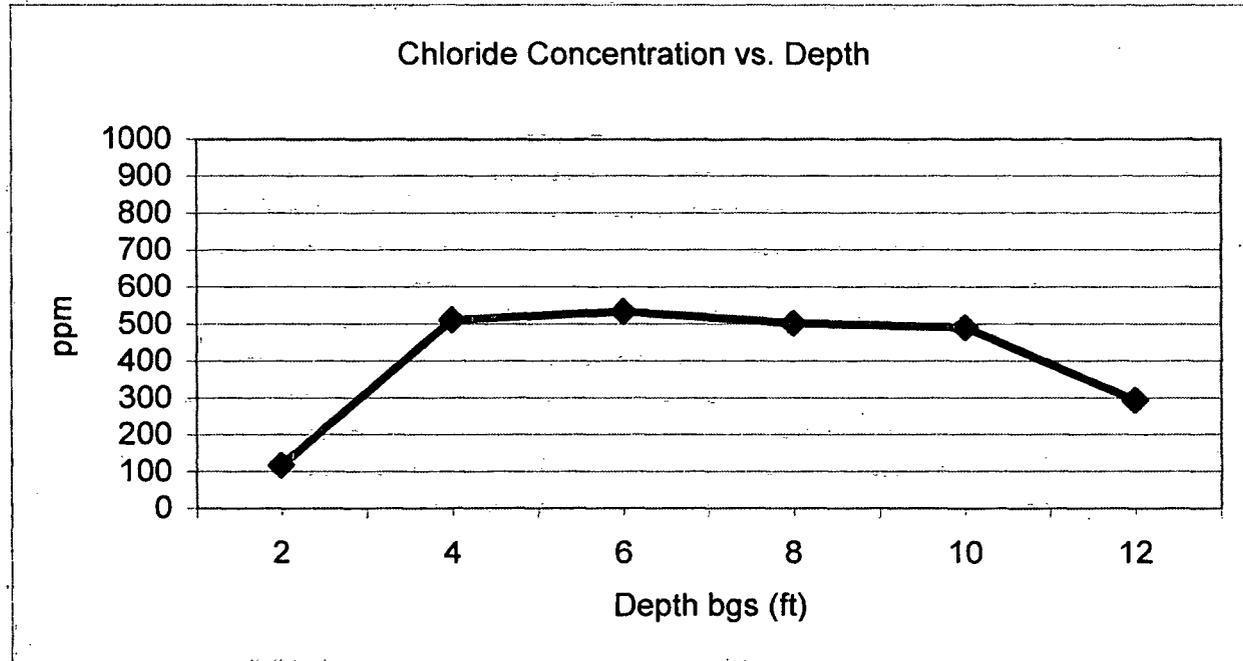
RICE Operating Company

EME C-10-1 EOL

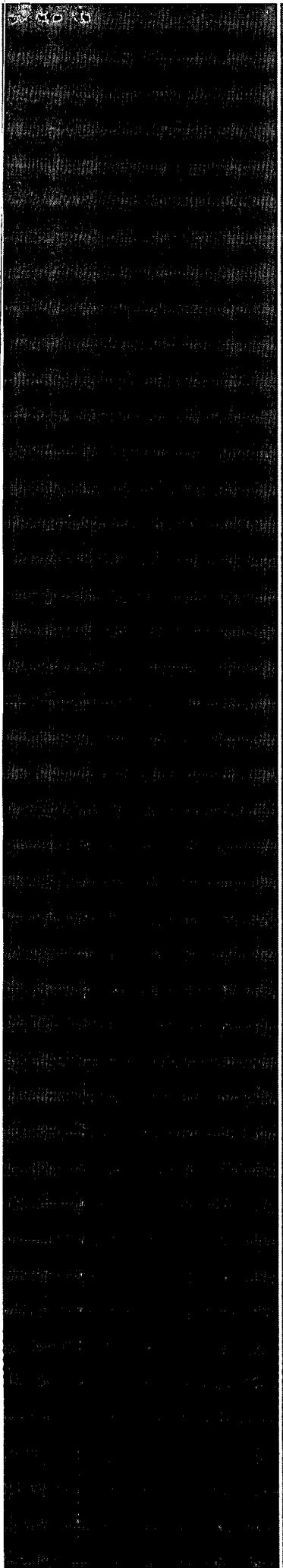
Unit 'C', Sec. 10, T21S, R36E

Backhoe samples 5 ft. north of the junction (source)

Depth bgs (ft)	[Cl] ppm
2	117
4	511
6	533
8	502
10	490
12	294



Groundwater = 200 ft.



Revegetation Form and Photodocumentation

RICE *Operating Company* (ROC)
112 West Taylor Hobbs, NM 88240
Phone: (575) 393-9174 Fax: (575) 397-1471



PO Box 5630
 Hobbs, NM 88241
 Phone: (575) 393-4411
 Fax: (575) 393-0293

REVEGETATION FORM

1. General Information

Site name: EME C-10-1 EOL						
U/L C	Section 10	Township T-21-S	Range R-36-E	County Lea	Latitude N32*56168450	Longitude W103*31168300
Contact Name: Hack Conder						
Email: hconder@rice-ecs.com						
Site size: 2,700 square feet			Map detail of site attached <input type="checkbox"/>			
Additional information:						

2. Soils

**Do not rip caliche subsoils; caliche rocks brought to the surface by ripping shall be removed.*

Salvaged from site <input type="checkbox"/>	Bioremediated <input type="checkbox"/>	Imported <input checked="" type="checkbox"/>	Blended <input checked="" type="checkbox"/>	Depth (in):
Texture: Describe soil & subsoil:				
Soil prep methods: Rip <input type="checkbox"/>	Depth(in):	Disc <input checked="" type="checkbox"/>	Depth (in): 3"	Rollerpack <input type="checkbox"/>
Date completed: 10/15/2010				

3. Bioremediation

Fertilizer <input type="checkbox"/>	Hay <input type="checkbox"/>	Other <input checked="" type="checkbox"/> 6 Bags Restore Nhance
Type:		Describe: 4 Bags Pete Moss 2 Bags Potting Soil 1 Bag Manure
Lbs/acre:		

4. Seeding

**Attach seed bag tags to this form. Seed bag tags shall contain the site name and S-T-R.*

Custom seed mix <input type="checkbox"/>	Prescribed mix <input type="checkbox"/>	Seed mix name: 3 lbs. Lea Co. Mix/3 lbs. Side Oats/3 lbs. Blue Grama	Seeding date: 4/3/2013
Broadcast <input checked="" type="checkbox"/>			
Method: Mechanical Drop Seeder			
Soil conditions during seeding: Dry <input checked="" type="checkbox"/> Damp <input type="checkbox"/> Wet <input type="checkbox"/>			
Photos attached <input type="checkbox"/>	Observations: The Seed Was Disked into the Soil		
Number of photos:			

5. Certification

I hereby certify that the information in this form and attachments is true and complete to the best of my knowledge and belief.

Name: Kyle Norman	Title: Environmental Tech	Date: 4/3/2013
Signature:		

EME C-10-1 EOL (1R427-357)

UL/C, Section 10, T21S-R36E



Spreading amendments, facing north

4/3/2013



Tilling site, facing west

4/3/2013



Seeding site, facing east

4/3/2013



Site complete, facing east

4/3/2013

Hansen, Edward J., EMNRD

From: Katie Jones <kjones@riceswd.com>
Sent: Wednesday, May 29, 2013 1:29 PM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder; Laura Pena
Subject: ROC - EME C-10-1 EOL (1R427-357) Field Data
Attachments: ROC - EME C-10-1 EOL (1R427-357) Field Data.pdf

Mr. Hansen,

Attached is the field data for the EME C-10-1 EOL (1R427-357) site. Please call Hack at (575)631-6432 if you have any questions or require any additional information.

Thank you.

Katie Jones
Environmental Project Manager
RICE *Operating Company*

JCT BOX DELINEATION SUMMARY REPORT

ite: EME C-10-1 EOL Legal:UL/C SEC. 10 (T21S-R36E) Landowner:MILLARD DECK GW: 200'

Source	5' North		5' South		5' East		5' West			
	CL	PID	CL	PID	CL	PID	CL	PID		
1										
2										
3	141	0.2	4	511 1.9	4	261 3.1	4	171 6.3	4	58 1.1
4	437	4.7	6	533 1	6	529 24.8	6	542 3.7	6	316 10
5	419	4.9	8	502 0.4	8	285 11.1	8	234 0.2	8	422 6.2
5	459	6.6	10	490 0.4	10	453 9.3	10	426 0.8	10	665 2.2
7	419	1.2	12	294 0.4	12	171 8.2	12	232 0	12	335 2.2
3	417	0.2								
3	421	0.1								
0	310	0								
1	321	0								
2	341	0								

North Wall	
Cl-	
PID	

South Wall	
Cl-	
PID	

East Wall	
Cl-	
PID	

West Wall	
Cl-	
PID	

4 Wall Comp	
Cl-	403
PID	2.4

	Pt.1	Pt.2	Pt.3	Pt.4	Pt.5	5 Pt Comp.
Cl-						207
PID						0.6

Background at 6"	
Cl-	
PID	

Excavation Deminsions:

Soil hauled off and where:

Soil imported and from where:

field results	cl-	pid	lab results	gro	dro	cl-
BOTTOM SPT. COMP. @	207	0.6	BOTTOM SPT. COMP.	<10	<10	272
4 WALL COMP.	403	2.4	4 WALL COMP.	<10	<10	448
BLENDED BACKFILL	200	1.8	BLENDED BACKFILL	<10	<10	32
SOURCE @	341	0	SOURCE @			

Summary: DUG SITE TO A 10X10X12 TOOK SAMPLES AT REGULAR INTERVALS AND RECORDING DATA. 9-29-10 TOOK FINAL SANPLES AND TOOK TO LAB.

Source	10' North		10' South		10' East		10' West	
	CL	PID	CL	PID	CL	PID	CL	PID
2			2		2		2	
4			4		4		4	
6			6		6		6	
8			8		8		8	
10			10		10		10	
12			12		12		12	

Source	15' North		15' South		15' East		15' West	
	CL	PID	CL	PID	CL	PID	CL	PID
2			2		2		2	
4			4		4		4	
6			6		6		6	
8			8		8		8	
10			10		10		10	
12			12		12		12	

Signature:

Dab Harris

Date:

10-15-10