AE Order Number Banner

Report Description

This report shows an AE Order Number in Barcode format for purposes of scanning. The Barcode format is Code 39.

App Number: pEEM0112355509

NM1 - 9

AGUA MOSS, LLC

12/9/2016

15

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., 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

Form C-141
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☒ Final Report

Name of Company AGUA MOSS	Contact SHACIE MURRAY
Address PO BOX 600 FARMINGTON NM 87499	Telephone No. 505-330-7605
Facility Name SUNCO	Facility Type SURFACE WASTE PERMIT NM01-009-00

Surface Owner AGUA MOSS	Mineral Owner AGUA MOSS	API No. N/A

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
E	2	29N	12W					SAN JUAN

Latitude N36.75536 **Longitude** W108.07295

NATURE OF RELEASE

Type of Release Hydrocarbon/coal fines	Volume of Release >10 bbl	Volume Recovered N/A
Source of Release Decommissioned Separator	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? ☐ Yes ☐ No ☒ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

OIL CONS. DIV DIST. 3
NOV 03 2016

Describe Cause of Problem and Remedial Action Taken.*

During the demolition of a separator vessel coal fines and minimal hydrocarbon were released onto the ground.

Describe Area Affected and Cleanup Action Taken.*

Approximately 37' by 47' area of ground was excavated and transported to Envirotech Landfarm for disposal, then the area was sampled according to guidance by the Aztec District OCD.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: Thilana Thompson

Printed Name: Thilana Thompson

Title: Regulatory Compliance

E-mail Address: thompson@emerion.biz

Date: 10-31-16 Phone: 5054861171

OIL CONSERVATION DIVISION

Approved by Environmental Specialist:

Approval Date: 12/9/2016 Expiration Date:

Conditions of Approval: NVF1634440863

Attached ☐

* Attach Additional Sheets If Necessary

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Rule Engineering, LLC
Solutions to Regulations for Industry

October 26, 2016

Ms. Shacie Murray
Agua Moss LLC
P.O. Box 600
Farmington, New Mexico 87499

Re: Agua Moss Equipment Area Release
Confirmation Sampling Report

Dear Ms. Murray:

This report summarizes the confirmation sampling activities conducted by Rule Engineering, LLC (Rule) at the Agua Moss Equipment Area Release located in Unit Letter E, Section 2, Township 29N, Range 12W in San Juan County, New Mexico. Activities included collection and analysis of a 5-point composite soil confirmation sample from near surface soils on September 16, 2016. A topographic map of the location is included as Figure 1 and an aerial site map is included as Figure 2.

BGT Summary
Site Name – Agua Moss Equipment Area Release
Location – Unit Letter E, Section 2, Township 29N, Range 12W
Release Location Latitude/Longitude – N36.75536 and W108.07295
Land Jurisdiction – Private
Release Source – Decommissioned separator
Release Volume – Undetermined/Non-reportable (less than 10 barrels)
Date of Confirmation Soil Sampling – September 16, 2016

NMOCD Site Ranking
In accordance with the New Mexico Oil Conservation Division (NMOCD) Guideline for Remediation of Leaks, Spills, and Releases (August 1993), this site was assigned a ranking score of 10 (Table 1).

Based on a ranking score of 10, action levels for remediated soils at the site are as follows: 10 milligrams per kilogram (mg/kg) benzene, 50 mg/kg total benzene, toluene, ethylbenzene, and total xylenes (BTEX), and 1,000 mg/kg total petroleum hydrocarbons (TPH).

Field Activities
On September 16, 2016, following removal of impacted surface soils by the operator, Rule personnel collected one composite confirmation soil sample from the release area. The confirmation sample (SC-1) is a representative composite comprised of five equivalent portions of soil collected from the sampled area. The excavated surface soils were removed from an area measuring approximately 37

feet by 47 feet and transported to Envirotech Landfarm near Bloomfield, New Mexico, for disposal/remediation. Sample locations and the release area illustrated on Figure 2.

Confirmation sample SC-1 collected for laboratory analysis was placed into laboratory supplied glassware, labeled, and maintained on ice until delivery to Hall Environmental Analysis Laboratory in Albuquerque, New Mexico. The sample was analyzed for BTEX per USEPA Method 8021B and TPH per USEPA Method 8015D.

Laboratory Analytical Results

Laboratory analytical results for sample SC-1 reported benzene and total BTEX concentrations below the laboratory reporting limits of 0.023 mg/kg and 0.207 mg/kg, respectively. Laboratory analytical results for SC-1 reported the TPH concentrations of below the laboratory reporting limit of 19 mg/kg per USEPA Method 418.1, below the laboratory reporting limit of 4.6 mg/kg as GRO per USEPA Method 8015D, and below the laboratory reporting limit of 9.8 mg/kg DRO by USEPA Method 8015D. The laboratory analytical result for SC-1 for chloride concentration was 11 mg/kg. Field and laboratory results for SC-1 are summarized in Table 1, and the analytical laboratory report is attached.

Conclusions

On September 16, 2016, confirmation sampling activities were conducted at the Agua Moss Equipment Area Release following the removal of hydrocarbon impacted surface soils from release of liquids from a decommissioned separator. Laboratory results for confirmation sample SC-1 were reported below the NMOCD action levels for benzene, total BTEX, and TPH for a site rank of 10. Based on laboratory analytical results, no further work is recommended.

Rule Engineering appreciates the opportunity to provide services to Agua Moss LLC. If you have any questions, please contact me at (505) 325-1055.

Sincerely,
Rule Engineering, LLC

Heather M. Woods

Heather M. Woods, P.G.
Area Manager/Geologist

Attachments:

Table 1. NMOCD Site Rank Determination
Table 2. Laboratory Analytical Results – Benzene, Total BTEX, and TPH
Figure 1. Topographic Map
Figure 2. Aerial Site Map
Analytical Laboratory Report

Table 1. NMOCD Site Ranking Determination
Agua Moss LLC
Agua Moss Equipment Area Release
San Juan County, New Mexico

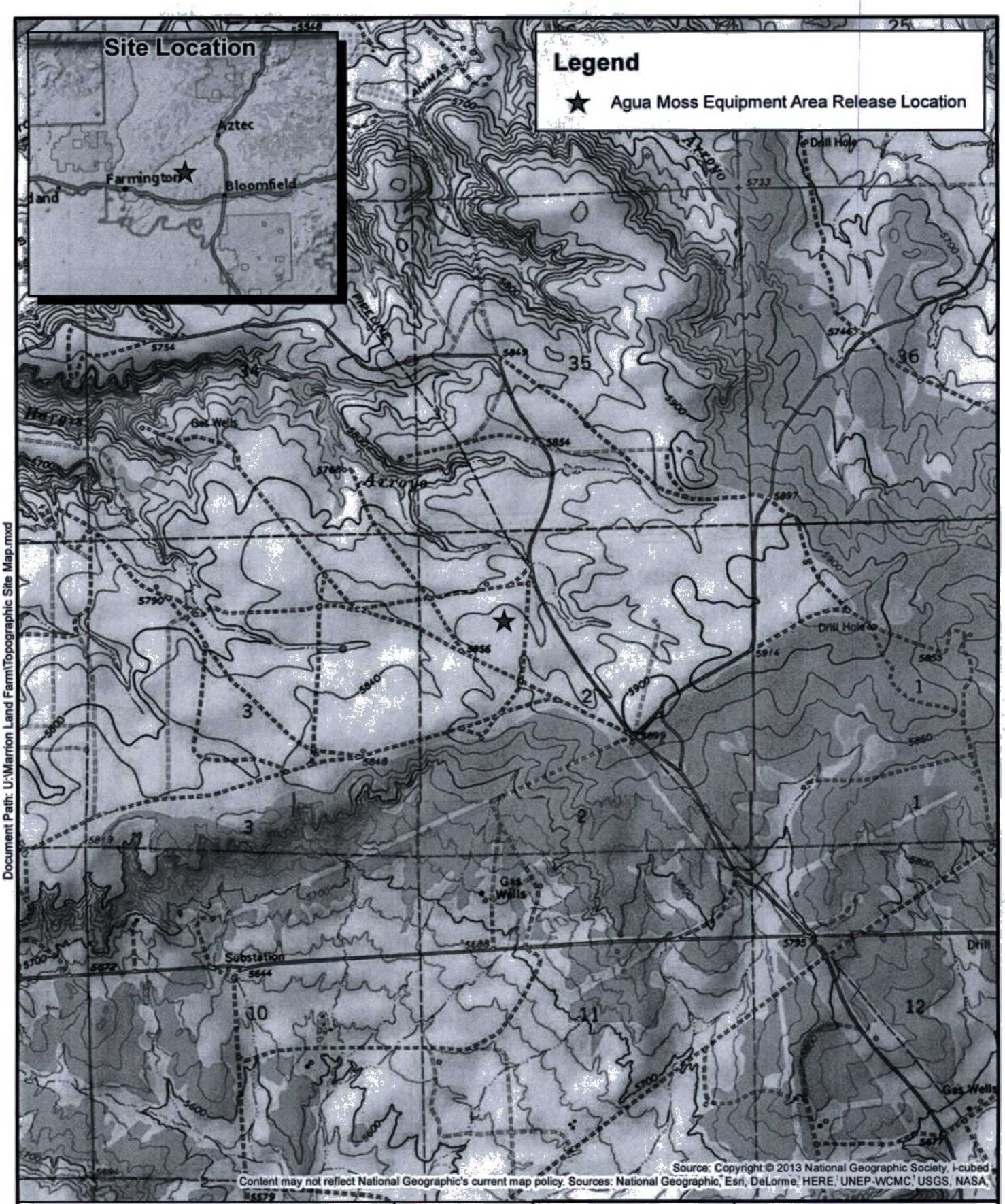
Ranking Criteria	Ranking Score	Site-Based Ranking Score	Basis for Determination	Data Sources
Depth to Groundwater				
<50 feet	20	10	Elevation differential information derived from the topographic map and depth to water reports available on the NMOSE NMWRRS for registered water wells in the general area.	NMOCD Online database, NMOSE NMWRRS, Flora Vista Quadrangle, Google Earth, and Visual Inspection
50-99 feet	10			
>100 feet	0			
Wellhead Protection Area				
<1,000 feet from a water source, or <200 feet from private domestic water source	20 (Yes)	0	No water source or recorded water wells within 1,000 foot radius of location.	NMOSE NMWRRS, Flora Vista Quadrangle, Google Earth, and Visual Inspection
	0 (No)			
Distance to Surface Water Body				
<200 horizontal feet	20	0	The release site is located within an unnamed, ephemeral drianage which flows to a stockpond approximately 690 feet to the south.	Flora Vista Quadrangle, Google Earth, and Visual Inspection
200 to 1,000 horizontal feet	10			
>1,000 horizontal feet	0			
Site Based Total Ranking Score		**10**		

Table 2. Laboratory Analytical Results - Benzene, Total BTEX, and TPH
Agua Moss LLC
Agua Moss Equipment Area Release
San Juan County, New Mexico

Sample Name	Date	Location	Approximate Sample Depth (ft bgs)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylben-zene (mg/kg)	Total Xylenes (mg/kg)	Total BTEX (mg/kg)	TPH as GRO (mg/kg)	TPH as DRO (mg/kg)	TPH as MRO (mg/kg)
NMOCD Action Levels*				10	NE	NE	NE	50	1,000**		
SC-1	9/16/2016	Composite	0 to 0.5	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	28	130

Notes:
ft bgs - feet below grade surface
mg/kg - milligrams per kilogram
NE - not-established
NMOCD - New Mexico Oil Conservation Division
*Based on the NMOCD *Guidelines for Remediation of Leaks, Spills and Releases (August 1993)*
**Based on a site ranking of 10.

BTEX - benzene, toluene, ethylbenzene, and xylenes
TPH - total petroleum hydrocarbons
GRO - gasoline range organics
DRO - diesel range organics
MRO - mineral oil range organics



Document Path: U:\Marrion Land Farm\Topographic Site Map.mxd

Rule Engineering, LLC
Solutions to Regulations for Industry

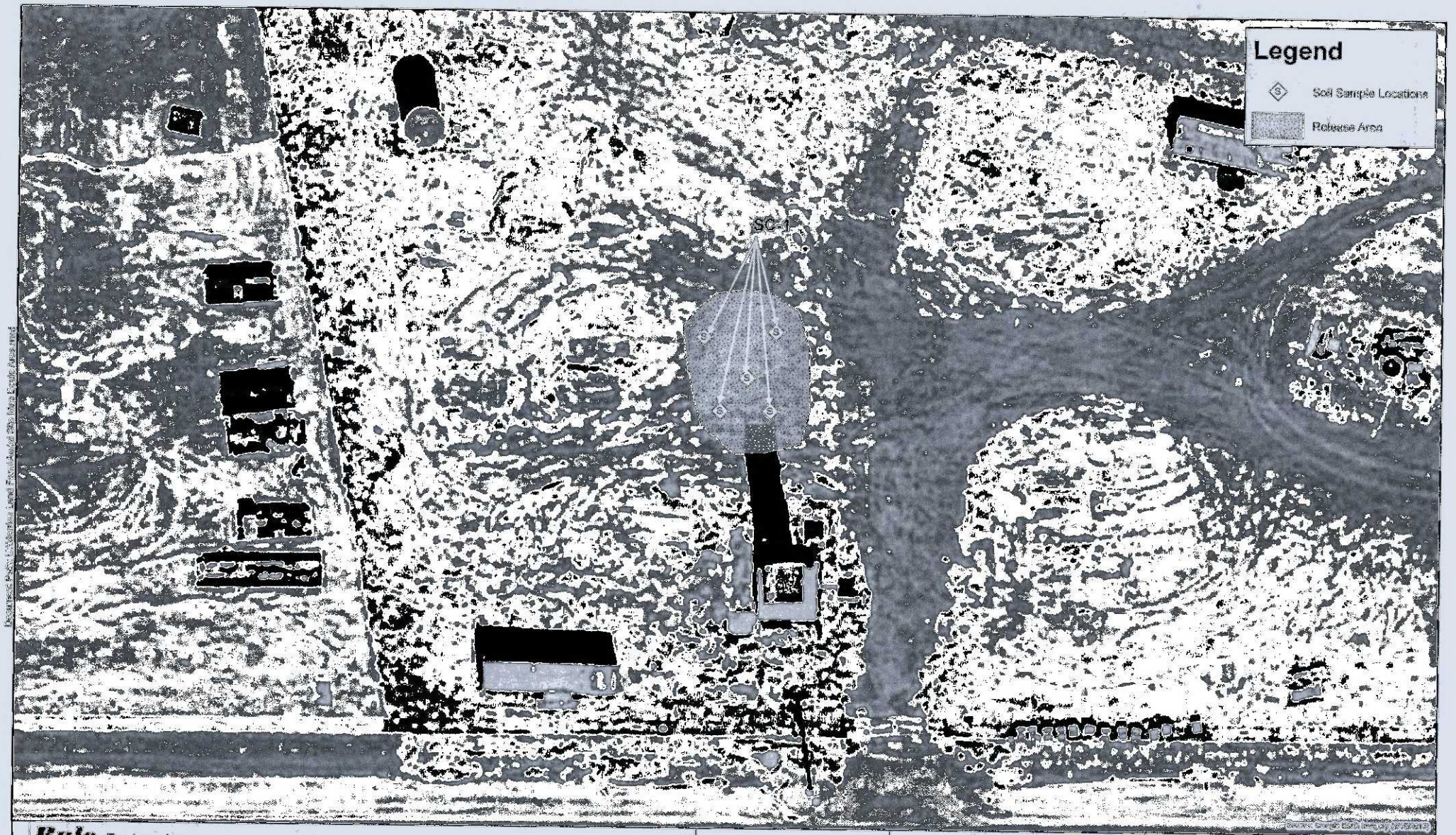
0 1,050 2,100 4,200 Feet

Flora Vista Quadrangle
1:24,000

Agua Moss

E-S02-T29N-R12W
N36.75536, W108.07295
San Juan County, NM

Figure 1
Topographic Site Map
Agua Moss Equipment Area Release



Rule Engineering, LLC
Solutions in Regulations for Industry

0 20 40 80 120 160 Feet
1 inch = 25 feet

Updated Date: 10/24/2018

Agua Moss

E-S02-T29N-R12W
N36.75536, W108.07295
San Juan County, NM

Figure 2
Aerial Site Map
Agua Moss Equipment Area Release

HALL
ENVIRONMENTAL
ANALYSIS
LABORATORY

Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

September 22, 2016

Heather Woods
Rule Engineering LLC
501 Airport Dr., Ste 205
Farmington, NM 87401
TEL: (505) 325-1055
FAX

RE: Equipment Area

OrderNo.: 1609954

Dear Heather Woods:

Hall Environmental Analysis Laboratory received 1 sample(s) on 9/17/2016 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Analytical Report
Lab Order **1609954**
Date Reported: **9/22/2016**

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Rule Engineering LLC
Client Sample ID: SC-1
Project: Equipment Area
Collection Date: 9/16/2016 8:40:00 AM
Lab ID: 1609954-001 **Matrix:** SOIL **Received Date:** 9/17/2016 8:00:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS						Analyst: **TOM**	
Diesel Range Organics (DRO)	28	9.7		mg/Kg	1	9/21/2016 3:50:30 PM	27605
Motor Oil Range Organics (MRO)	130	49		mg/Kg	1	9/21/2016 3:50:30 PM	27605
Surr: DNOP	78.1	70-130		%Rec	1	9/21/2016 3:50:30 PM	27605
EPA METHOD 8015D: GASOLINE RANGE						Analyst: **NSB**	
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	9/21/2016 12:24:32 AM	27570
Surr: BFB	80.7	68.3-144		%Rec	1	9/21/2016 12:24:32 AM	27570
EPA METHOD 8021B: VOLATILES						Analyst: **NSB**	
Benzene	ND	0.025		mg/Kg	1	9/21/2016 12:24:32 AM	27570
Toluene	ND	0.050		mg/Kg	1	9/21/2016 12:24:32 AM	27570
Ethylbenzene	ND	0.050		mg/Kg	1	9/21/2016 12:24:32 AM	27570
Xylenes, Total	ND	0.099		mg/Kg	1	9/21/2016 12:24:32 AM	27570
Surr: 4-Bromofluorobenzene	96.2	80-120		%Rec	1	9/21/2016 12:24:32 AM	27570

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
D	Sample Diluted Due to Matrix	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1609954

22-Sep-16

Client: Rule Engineering LLC

Project: Equipment Area

Sample ID	LCS-27605	SampType:	LCS		TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	LCSS	Batch ID:	27605		RunNo:	37357					
Prep Date:	9/20/2016	Analysis Date:	9/21/2016		SeqNo:	1161362	Units:	mg/Kg			
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)		46	10	50.00	0	92.3	62.6	124			
Surr: DNOP		4.3		5.000		86.9	70	130			

Sample ID	MB-27605	SampType:	MBLK		TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	PBS	Batch ID:	27605		RunNo:	37357					
Prep Date:	9/20/2016	Analysis Date:	9/21/2016		SeqNo:	1161363	Units:	mg/Kg			
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)		ND	10								
Motor Oil Range Organics (MRO)		ND	50								
Surr: DNOP		9.5		10.00		94.9	70	130			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
D	Sample Diluted Due to Matrix	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1609954**

22-Sep-16

Client: Rule Engineering LLC

Project: Equipment Area

Sample ID	MB-27570	SampType:	MBLK		TestCode:	EPA Method 8015D: Gasoline Range				
Client ID:	PBS	Batch ID:	27570		RunNo:	37324				
Prep Date:	9/19/2016	Analysis Date:	9/20/2016		SeqNo:	1159754	Units:	mg/Kg		

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	790		1000		79.3	68.3	144			

Sample ID	LCS-27570	SampType:	LCS		TestCode:	EPA Method 8015D: Gasoline Range				
Client ID:	LCSS	Batch ID:	27570		RunNo:	37324				
Prep Date:	9/19/2016	Analysis Date:	9/20/2016		SeqNo:	1159755	Units:	mg/Kg		

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	23	5.0	25.00	0	90.7	74.6	123			
Surr: BFB	880		1000		88.2	68.3	144			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
D	Sample Diluted Due to Matrix	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1609954**

22-Sep-16

Client: Rule Engineering LLC

Project: Equipment Area

Sample ID	MB-27570	SampType:	MBLK	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	PBS	Batch ID:	27570	RunNo:	37324					
Prep Date:	9/19/2016	Analysis Date:	9/20/2016	SeqNo:	1159778	Units:	mg/Kg			

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.025								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	0.96		1.000		95.9	80	120			

Sample ID	LCS-27570	SampType:	LCS	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	LCSS	Batch ID:	27570	RunNo:	37324					
Prep Date:	9/19/2016	Analysis Date:	9/20/2016	SeqNo:	1159779	Units:	mg/Kg			

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.88	0.025	1.000	0	88.1	75.3	123			
Toluene	0.93	0.050	1.000	0	93.0	80	124			
Ethylbenzene	0.97	0.050	1.000	0	96.9	82.8	121			
Xylenes, Total	2.9	0.10	3.000	0	96.3	83.9	122			
Surr: 4-Bromofluorobenzene	1.0		1.000		102	80	120			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
D	Sample Diluted Due to Matrix	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

HALL ENVIRONMENTAL ANALYSIS LABORATORY

Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-1107
Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: RULE ENGINEERING LL Work Order Number: 1609954 RcptNo: 1

Received by/date: 09/17/16

Logged By: Lindsay Mangin 9/17/2016 8:00:00 AM

Completed By: Lindsay Mangin 9/17/2016 8:47:31 AM

Reviewed By: 09/19/16

Chain of Custody

1. Custody seals intact on sample bottles?	Yes ☐	No ☐	Not Present ☑
2. Is Chain of Custody complete?	Yes ☑	No ☐	Not Present ☐
3. How was the sample delivered?	Courier		

Log In

4. Was an attempt made to cool the samples?	Yes ☑	No ☐	NA ☐
5. Were all samples received at a temperature of >0° C to 6.0°C	Yes ☑	No ☐	NA ☐
6. Sample(s) in proper container(s)?	Yes ☑	No ☐	
7. Sufficient sample volume for indicated test(s)?	Yes ☑	No ☐	
8. Are samples (except VOA and ONG) properly preserved?	Yes ☑	No ☐	
9. Was preservative added to bottles?	Yes ☐	No ☑	NA ☐
10. VOA vials have zero headspace?	Yes ☐	No ☐	No VOA Vials ☑
11. Were any sample containers received broken?	Yes ☐	No ☑	
12. Does paperwork match bottle labels? (Note discrepancies on chain of custody)	Yes ☑	No ☐	# of preserved bottles checked for pH: (<2 or >12 unless noted)
13. Are matrices correctly identified on Chain of Custody?	Yes ☑	No ☐	Adjusted?
14. Is it clear what analyses were requested?	Yes ☑	No ☐	
15. Were all holding times able to be met? (If no, notify customer for authorization.)	Yes ☑	No ☐	Checked by:

Special Handling (if applicable)

16. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☑

Person Notified: _____ Date: _____

By Whom: _____ Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person

Regarding: _____

Client Instructions: _____

17. Additional remarks:

18. **Cooler Information**

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	4.7	Good	Yes			

Chain-of-Custody Record

ent: Rule Engineering, LLC

iling Address: 501 Airport Dr, Suite 205

armington, NM 87401

one #: (505) 716-2787

ail or Fax#: hwoods@ruleengineering.com

'QC Package:

Standard ☐ Level 4 (Full Validation)

creditation

NELAP ☐ Other _____

EDD (Type) _____

Turn-Around Time:

☒ Standard ☐ Rush _____

Project Name: Equipment Area

Project #:

Project Manager: Heather Woods

Sampler: HW/JV

On Ice: ☒ Yes ☐ No

Sample Temperature: 4.7

HALL ENVIRONMENTAL ANALYSIS LABORATORY

www.hallenvironmental.com

4901 Hawkins NE - Albuquerque, NM 87109

Tel. 505-345-3975 Fax 505-345-4107

Analysis Request

ate	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No. 1609951	BTEX + ~~MTBE~~ + ~~TMB's~~ (8021)	BTEX + MTBE + TPH (Gas only)	TPH 8015B (GRO / DRO / MRO)	TPH (Method 418.1)	EDB (Method 504.1)	PAH's (8310 or 8270 SIMS)	RCRA 8 Metals	Anions (F,Cl,NO_3,NO_2,PO_4,SO_4)	8081 Pesticides / 8082 PCB's	8260B (VOA)	8270 (Semi-VOA)						Air Bubbles (Y or N)
9/16	840	Soil	SC-1	(1) 4oz Glass	cold	-001	X		X														

NFS (HW)

te:	Time:	Relinquished by:	Received by:	Date	Time	Remarks:
9/16	1630	Heather M. Woods	Christine Walsh	9/16/16	1630	
te:	Time:	Relinquished by:	Received by:	Date	Time	
9/16	1800	Christine Walsh		09/17/16	0800	

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.