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REPORTS

DATE:

02/24/2006



Integrated Environmental Solutions

February 24, 2006

805 Las Cimas Parkway, Suite 300 Austin, TX 78746-6179 Telephone: 512-327-9840 Fax: 512-327-6163

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Mr. Glen VonGonten New Mexico Energy, Minerals, and Natural Resources Department 12205 St. Francis Drive Santa Fe, NM 87205

Subject: Groundwater Evaluation Former Baker Oil Tools Facility 2800 West Marland - Hobbs, NM

Dear Mr. VonGonten:

At the request of Baker Oil Tools (BOT), RMT, Inc has reviewed the information available concerning. the former Baker Oil Tools Facility in Hobbs, New Mexico. Our evaluation included a review of the historical groundwater analytical results and groundwater flow-path information to determine if: (1) monitor well locations were sufficient to properly detect any possible releases from the on-site impoundment, (2) what monitor wells (existing or proposed) would be necessary for proper detection, and (3) what parameters should be analyzed based on the historic data. The purpose of this correspondence is to inform you of our findings and to relay Baker Hughes' plan for further detection monitoring.

Monitoring System:

Figure 1 is a map of the facility, which indicates the locations of the current on-site groundwater wells (identified as wells MWs-1, 2, 3, 16, R-1, and WW-1). Wells MWs-1, 2, and 3 were installed and sampled as part of the initial and on-going site assessment. Well WW-1 appears to be a water supply well screened in a lower aquifer. MW-16 was discovered during a site visit in early February 2006 and appears to be part of a neighboring facilities groundwater monitoring system. An evaluation of the potentiometric groundwater surface prepared from the water levels recorded during sampling events in March 2000, September 2000, December 2000, December 2001, March 2003, and April 2004 (see Table 1 for summary of measured levels and flow calculations) indicates that over this five year period the groundwater flow direction has a flow-path deviation of only 31° ranging from 135° to 104° of true north (see Attachment A for potentiometric maps and Figure 2 for flow-path compilation). In addition, groundwater gradient and flow velocity ranged from 0.0011 to 0.0033 feet per foot and 0.06 to 0.18 feet per day, respectively (Table 1 graph). Based on this evaluation, well MW-1 is located immediately upgradient of the impoundment and well R-1 is located immediately downgradient of the impoundment in the center of the average groundwater flow-path direction. As such, these two wells are sufficient for detection of any releases to the groundwater beneath the impoundment.

Analytical Parameters:

Table 2 is a summary of the historical analytical results for the facility groundwater and a graph of analytical results from 2-Methylnaphthalene and Naphthalene.

Mr. Glen VonGonten New Mexico Energy, Minerals, and Natural Resources Department February 24, 2006 Page 2

- Well MW-2, located in the northeast corner of the facility and well outside the flow-path, has not had an indication of impact above method detection limits for any parameters analyzed.
- WW-1 has had no analytical results above method detection limits and is most likely screened in a deeper aquifer.
- Well MW-3, located in the southeast corner of the facility and adjacent to the downgradient groundwater flow-path, has had benzene and MTBE identified above the method detection limits; however, neither constituent would be expected at the site based on historic practices. In a letter dated March 8, 1995 (see Attachment B, the New Mexico Oil Conservation Division (NMOCD) concurred that the volatile organic compound (VOC) contaminants were coming onsite from an upgradient neighboring property.
- Well MW-1, located immediately upgradient of the impoundment and in direct line of the groundwater in-flow flow-path, had analytical results indicating both 2-methylnaphthalene and naphthalene above the NM 20.6.2.3103 abatement standard during the sampling event of June 27, 2000. There had been no occurrences above method detection limits in the two sampling events prior to June 2000 nor had there been in the six sampling events following the June 2000 event.
- Well R-1, located immediately downgradient of the impoundment and in direct line of the groundwater flow-path, has had indications of 2-methylnaphthalene or naphthalene in seven of the nine sampling events. A review of the graphic representation of the analytical results indicates that the identified concentrations are reducing through time. Concentrations were below the New Mexico Standard for the last five sampling events (since 2000) except for 2-Methylnaphthalene which slightly exceeded the standard by 0.004 mg/L in December 2004.

Response Plan:

In response to the findings of this evaluation, Baker Hughes will make the following response:

- In order to further evaluate the 2-methylnaphthalene and naphthalene identified in well R-1, Baker Hughes will collected and analyze groundwater samples from upgradient well MW-1 and downgradient wells R-1 (immediately downgradient) and MW-3 (distal downgradient) on a quarterly basis for four consecutive quarters in 2006 (beginning in February 2006).
- These samples will be analyzed for 2-methylnaphthalene and naphthalene by a contract laboratory.
- During each sampling event, static groundwater levels will be measured in all accessible on-site groundwater monitoring wells and in the on-site deep well. These measurements will be utilized to prepare potentiometric maps for the purpose of continuing to evaluate the groundwater flow-path direction and groundwater flow velocity.

Mr. Glen VonGonten New Mexico Energy, Minerals, and Natural Resources Department February 24, 2006 Page 3

 During each sampling event, the groundwater quality indicators of pH, specific conductance, and temperature will be measured in the field and recorded with the analytical results.

Attachment C contains the field program summary sheet and field data collection forms that will be utilized during the sampling events.

Following the receipt and evaluation of the fourth quarterly sample results, a report will be prepared and submitted to the New Mexico Energy, Minerals, and Natural Resources Department which summarizes all results and makes recommendations based on those results.

Should you have any questions or comments, please contact me at 512-329-3122 or at robert.sherrill@rmtinc.com.

Sincerely,

RMT, Inc.

Robert L. Sherrill, PG Senior Project Manager - RMT, Inc.

cc: Ms. Myna Letlow - Baker Hughes Mr. Joseph Hossley, PE, DEE - RMT, Inc. Central Files

Attachments:

Figure 1 – Site Well Location Map

Figure 2 – Groundwater Flow-Path Map

Table 1 – Groundwater Levels and Graphs

Table 2 – Historical Analytical Results and Graph

Attachment A – Potentiometric Maps of Groundwater Elevations

Attachment B – March 8, 1995 NM EMNRD Correspondence

Attachment C - Sampling Program and Field Data Collection Forms

Tables

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SUMMARY OF HISTORICAL GROUNDWATER CONDITIONS & CHARACTERISTICS Baker Oil Tools - Hobbs, New Mexico TABLE 1

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Date of	Top Casing=	100.19	Top Casing=	99.56	Top Casing=	99.15	Top Casing=	100.03
Measurement	Total Depth=	45.7	Total Depth=	45.0	Total Depth=	38.5	Total Depth=	48.0
	ft-BTOC	ft-REF	ft-BTOC	11-REF	ft-BTOC	ft-REF	ft-BTOC	ft-REF
29-Mar-00	35.45	64.74	35.23	64.33	34.88	64.27		
27-Sep-00	36.09	64.10	35.68	63.88	35.35	63.80	36.08	63.95
5-Dec-00	36.02	64.17	35.62	63.94	35.22	63.93	35.94	64.09
5-Dec-01	36.77	63.42	36.59	62.97	36.28	62.87	36.85	63.18
12-Mar-03	37.88	62.31	37.77	61.79	37.55	61.60	37.92	62.11
6-Apr-04	38.78	61.41	38.36	61.20	38.00	61.15	38.69	61.34
28-Dec-04	37.17	63.02	36.76	62.80	36.48	62.67	37.09	62.94
MAX VALUE	38	.78	38	36	38	.00	38	:69
MIN VALUE	35	.45	35	23	34	.88	35	.94
AVG VALUE	36	.88	36	.57	36	.25	37	.10
DEVIATION	ς.	33	ς.	13	сл.	12	2.	75

65.02 64.46

ft-REF

ft-BTOC 35.01 35.57

LOWER AQUIFER

WW-1

Top Casing= 100.03 Total Depth= 125.0 62.75

36.23 37.28

62.93 63.43

37.10

36.60

37.28 35.01 36.17

2.27

64.64 63.80

35.39

GROUNDWATER FLOW CHARACTERISTICS:

)		SRADIENT CAL	CULATIONS			VELOC	ITY CALCUL	ATIONS		FLOW	РАТН
Date of Measurement	MW-1 Upgradient	MW-3 Downgradient	Linear Distance	Gradient	Hydraulic Conductivity	Hydraulic Head	Formation Porosity	Flow Velocity	Flow Velocity	Degrees from True Modb	Compass Direction of
	water Levei (ft-REF)	water Level (ft-REF)	(#)	1/11	gpd/ft ²	Umerence (ft)	(as decimal)	ruday	пуеаг		Flow
29-Mar-00	64.74	64.27	215	0.0022	100	0.0022	0.24	0.12	44.3	130	ESE
27-Sep-00	64.10	63.80	215	0.0014	100	0.0014	0.24	0.08	28.3	127	ESE
05-Dec-00	64.17	63.93	215	0.0011	100	0.0011	0.24	0.06	22.6	104	ESE
05-Dec-01	63.42	62.87	215	0.0026	100	0.0026	0.24	0.14	51.9	125	ESE
12-Mar-03	62.31	61.60	215	0.0033	100	0.0033	0.24	0.18	67.0	117	ESE
06-Apr-04	61.41	61.15	215	0.0012	100	0.0012	0.24	0.07	24.5	107	ESE
28-Dec-04	63.02	62.67	215	0.0016	100	0.0016	0.24	0.09	33.0	135	SE
MAX VALUE	64.74	64.27		0.0033		0.0033		0.18	67.0	135	
MIN VALUE	61.41	61.15		0.0011		0.0011		0.06	22.6	104	
AVG VALUE	63.31	62.90		0.0019		0.0019	and the second secon	0.11	38.8	121	
DEVIATION	3.33	3.12		0.0022		0.0022	an a	0.12	44.3	31	
ft-BTOC =	linear feet Below Top	Of well Casing		ft =	feet			gpd/ff ^z =	Gallons per Day pe	r Square Feet of Aqu	uifer Matrix

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ft = feet FT/FT = Feet of Head Change/Feet of Horizontal Seperation

ft-BTOC = linear feet Below Top Of well Casing ft-REF = feet corrected to fixed Surveyed Elevation

TABLE 1 (continued) SUMMARY OF HISTORICAL GROUNDWATER CONDITIONS & CHARACTERISTICS Baker Oil Tools - Hobbs, New Mexico



Baker Oil Tools - Hobbs, NM



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TABLE 2 SUMMARY OF GROUNDWATER ANALYTICAL RESULTS Baker Atlas Facility - Hobbs, New Mexico

_		CONSTI	TUENTS MIGRAT	ING FROM UP	GRADIENT NEI	GHBOR ⁽¹⁾		
#	Constituent >	Benzene	Ethylbenzene	Toluene	Xylenes	MTBE	2-Methyl- naphthalene	Naphthalene
le l	Method >	S-8020A	S-8020A	S-8020A	S-8020A	S-8020	S-8270C	S-8270C
S I	Units >	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
	Standard >	0.01	0.75	0.75	0.62	DL	0.03	0.03
	21-Dec-99	<0.005	<0.005	<0.005	< 0.005	<0.005	<0.01	<0.01
	29-Mar-00	< 0.005	< 0.005	<0.005	< 0.005	<0.005	<0.01	<0.01
	27-Jun-00	<0.005	<0.005	< 0.005	< 0.005	<0.005	0.0159	0.0231
Ì	27-Sep-00	< 0.005	<0.005	<0.005	< 0.005	<0.005	< 0.01	<0.01
S	5-Dec-00	<0.005	< 0.005	<0.005	<0.005	<0.005	<0.01	<0.01
N	5-Dec-01	<0.001	< 0.001	<0.001	<0.001	<0.001	<0.01	<0.01
2	12-Mar-03	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
	6-Apr-04	<0.001	<0.001	<0.001	<0.002	<0.001	< 0.01	<0.01
	28-Dec-04	<0.001	<0.001	<0.001	<0.002	<0.001	<0.01	<0.01
	21-Dec-99	<0.005	<0.005	<0.005	<0.005	<0.005	<0.01	< 0.01
	29-Mar-00	< 0.005	< 0.005	<0.005	< 0.005	< 0.005	< 0.01	<0.01
	27-Jun-00	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.01	<0.01
	27-Sep-00	<0.005	<0.005	<0.005	< 0.005	<0.005	<0.01	<0.01
N	5-Dec-00	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.01	< 0.01
6	5-Dec-01	< 0.001	< 0.001	<0.001	< 0.001	<0.001	<0.01	<0.01
2	12-Mar-03	<0.01	<0.01	< 0.01	< 0.01	<0.01	< 0.01	<0.01
	6-Apr-04	< 0.001	< 0.001	< 0.001	< 0.002	<0.001	< 0.01	<0.01
	28-Dec-04	<0.001	<0.001	<0.001	< 0.002	<0.001	<0.01	<0.01
	21-Dec-99	<0.005	<0.005	<0.005	<0.005	<0.005	< 0.01	< 0.01
MW-3	29-Mar-00	< 0.005	< 0.005	<0.005	< 0.005	< 0.005	< 0.01	< 0.01
	27-Jun-00	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.01	< 0.01
	27-Sep-00	<0.005	< 0.005	< 0.005	<0.005	0.0382	<0.01	< 0.01
	5-Dec-00	< 0.005	< 0.005	< 0.005	< 0.005	0.0357	< 0.01	<0.01
	5-Dec-01	< 0.001	< 0.001	< 0.001	< 0.001	<0.001	< 0.01	< 0.01
	12-Mar-03	<0.01	<0.01	<0.01	< 0.01	<0.01	< 0.01	<0.01
	6-Apr-04	0.0016	< 0.001	< 0.001	< 0.001	0.0605	<0.01	<0.01
	28-Dec-04	<0.001	<0.001	< 0.001	< 0.001	0.0025	<0.01	<0.01
	21-Dec-99	< 0.005	< 0.005	<0.005	<0.005	< 0.005	0.1852	0.1173
	29-Mar-00	<0.005	< 0.005	<0.005	<0.005	<0.005	0.0975	0.1221
	27-Jun-00	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.0843	0.1386
	27-Sep-00	< 0.005	< 0.005	< 0.005	< 0.005	<0.005	0.0731	0.1642
)ı	5-Dec-00	< 0.005	< 0.005	< 0.005	<0.005	<0.005	< 0.01	0.021
Ř	5-Dec-01	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	0.013	0.014
	12-Mar-03	<0.01	<0.01	<0.01	< 0.01	<0.01	<0.01	<0.01
	6-Apr-04	<0.001	0.0011	<0.001	<0.002	<0.001	<0.01	<0.01
	28-Dec-04	<0.001	<0.001	<0.001	<0.002	<0.001	0.034	0.014
	21-Dec-99	< 0.005	< 0.005	<0.005	< 0.005	<0.005	<0.01	<0.01
	29-Mar-00	< 0.005	<0.005	<0.005	< 0.005	<0.005	<0.01	< 0.01
-	27-Jun-00	<0.005	<0.005	<0.005	<0.005	<0.005	<0.01	< 0.01
	27-Sep-00	<0.005	< 0.005	< 0.005	< 0.005	<0.005	<0.01	< 0.01
	5-Dec-00	<0.005	< 0.005	< 0.005	<0.005	<0.005	<0.01	<0.01
15	5-Dec-01	<0.001	<0.001	<0.001	< 0.001	<0.001	< 0.01	<0.01
>	12-Mar-03	<0.01	<0.01	<0.01	<0.01	<0.01	< 0.01	<0.01
1	6-Apr-04	< 0.001	<0.001	<0.001	<0.002	<0.001	<0.01	<0.01
	28-Dec-04	<0.001	<0.001	<0.001	<0.002	<0.001	<0.01	<0.01
•ð	East	ote: ⁽¹⁾	<0	01	0	013	0.0	843
NG S	Referenced	Lin NMOCD	not detected at indic	ated concentration	I detected at indicate	ed concentration but	detected at indicate	d concentration and
CODI	correspondence da from Willia	ated March 8, 199 m C. Olson	5		below abatement NM 20.	standard setforth in 6.2.3103	above abatement s NM 20.6	standard setforth in 5.2.3103

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Figures





Attachment A Potentiometric Maps of Groundwater Elevations















Attachment B March 8, 1995 NM EMNRD Correspondence

STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

2040 S. PACHECO SANTA FE, NEW MEXICO 87505 1505) 827-7131

March 8, 1995

CERTIFIED MAIL RETURN RECEIPT NO. P-667-242-219

Mr. Thomas V. Stenbeck Baker Oil Tools P.O. Box 40129 9100 Emmott Rd. Houston, Texas 77240-0129

RE: BAKER OIL TOOLS HOBBS FACILITY

Dear Mr. Stenbeck:

The New Mexico Oil Conservation Division (OCD) has completed a review of Baker Oil Tools, Inc. (Baker) January 13, 1995 "SITE ASSESSMENT REPORT, BAKER OIL TOOLS, 2800 W. MARLAND, HOBBS, NM". This document contains the results of Baker's investigation of ground water contamination at Baker's oilfield service company facility located at 2800 West Marland in Hobbs, New Mexico.

While the OCD approves of the investigation work performed, the investigation does show high levels of napthalenes directly adjacent to the former pit location and high levels of benzene in well WW-1. It appears that the high levels of benzene in well WW-1 are a result of contamination migrating from the upgradient Keeling Petroleum site and the OCD has referred the contamination in this well to the New Mexico Environment Department for action. However, the naphtalenes in the ground water and high soil TPH levels in the former pit appear to result from Baker's pit disposal activities.

Therefore, the OCD requests that Baker submit a plan to address the contamination in the direct vicinity of the former pit. Please submit the plan to the OCD Santa Fe Office with a copy provided to the OCD Hobbs Office.

If you have any questions, please call me at (505) 827-7154.

Sincerely

WÍlliam C. Olson Hydrogeologist Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor Wayne Price, OCD Hobbs Office

Attachment C Sampling program and Field data Collection Forms

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	INC.	GROUN	IDWATEF	R SAMF	LING FIELI	D PROGRA	M SHEE	F	HOBBS
				Bal	ker Hughes				
		acility:	Baker (Dil Tools	Site	Junior Hern	andez, Reg.	Mngr	
	A	ddress:	2800 Wes	st Marland	Access	American Sa	fety Service	es -	
			Hobbs, N	ew Mexico	D Contact:	505-393-883(1 505-390	-6733	
Form Date: FEB-01-2006	/ Revised:								
	-								
Sampling Reference In:	New Mexico E	nergy, Minera Oil and Co	ls and Natura onservation D	l Resource ivision	is Department		-	Glenn VonGo	nten
						18 19 19 19 19 19 19 19 19 19 19 19 19 19		and the second sec	
Event(s) Schedule:	JAN FEB 1 Event in 1st Q	MAR AF	PR MAY 1 Event in 2nd 0	JUN Quarter	JUL AUG 1 Event in 3rd (SEP OCT	· NOV ivent in 4th Qu	DEC Larter	2006
	ANALYTICA	L SAMPLINC		ar attained a first of the second				WATER LEV	VELS ONLY
	WELL	USE		DO NOT	SAMPLE ANY WE	ELLS CONTAINING		WE	
Sampling	MW-1	Backdroin		MEA	SURABLE PHASE	E-SEPARATED		NM	<u> </u>
Locations:		Downaradio			HYDROCAR	BON			2-4
	MW-3	Downgradie							01- - 10
the same of same of same of same		6							
	a	ARAMETER		TARGET	METHOD	HOLDING BLAN	K QA/QC	0	CONTAINER
	2-Methylnaphth	alene		4.1	S-8270C	7 days		4 m Amb	or Glace no troat
Analveie	Naphthalene			2	S-8270C	7 days	181		
Darformed	Hd			na	Field	immediate	।		
	Specific Conduc	stance		g	Field	immediate	& 	Measureme	ent completed in field
	Temperature			na	Field	immediate	&		
	T = trip blank, F = field	i blank, D = duplic	ate sample						
	SAMPLE TYPE	FREQUENCY	COLLECTED	ANALYS	SIS PERFORMED	NO. PER E	VENT		
Camples	TRIP BLANK	One per	Ice chest	Volatilve	e Organics Only	0			
	FIELD BLANK	One pe	r Event	Volatilve	e Organics Only	0			
			17					1	
Bottle Sets:	TYPE OF	BOTTLE	# Loc	ations	# per Location	# QA/QC	# EVENT	AN	ALYZED FOR
	1-liter Amber (Glass, no treat	t	3	2	0	9	Semiv	volatiles (8270)

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	Baker Oil Tools		MW-1	R-1	MW-3	FLUID
	Hobbs, New Mexico 88240-86	25	Background	Downgradient	Downgradient	LEVELS ONLY
(A)	Depth To Top Of Hydrocarbon	feet				MW-2
(B)	Depth To Top Of Groundwater	feet				Time:
(C)	Time Of Fluid Measurement	N/A				Top PSH:
(D)	Hydrocarbon Thickness	feet				Top Water:
(E)	Total Depth Of Well	feet				MW-16
(F)	Height Of Fluid Column In Well (E) - (B)	feet				Time:
(G)	Volume Multiplier (2-INCH WELLS)	N/A	0.17	0.17	0.17	Top PSH:
(H)	One Static Fluid Volume In Well : [(F) x (G)]	galions				Top Water:
(1)	Three Static Volumes To Be Purged : [(H) x 3]	gallons				WW-1
(J)	Volume Purged	galions				Time:
(К)	pH stn units					Top PSH:
(L)	Specific Conductance μmhos /cm³					Top Water:
(M)	Temperature	۴F				
(N)	Appearance Observations	Clarity				
(0)		Color				
بب ا	Is there damage to: V	Vell Pad:	[]Yes []No	[]Yes []No	[]Yes []No	
bed	Well	Casing:	[]Yes []No	[]Yes []No	[]Yes []No	
lus	Pump	/ Bailer:	[]Yes []No		[]Yes []No	
1-lit	er Amber Glass w/ No Treat	<u>s</u>	2	2	2	
		# Bottle				
	SAMPLER'S IN	ITIALS:				
	DATE SA	MPLED:				

Notes on any well damage noted on this page >

Samples Analyzed as part of:	Compliance Monitoring?	X YES NO	TRRP Investigation?	YES X NO	TRRP Closure?	YES X NO	
Baker Hughes	Baker Oil Tools	50-21007.03	NMOCD	na	No	quired?	Veeded? No
Client:	Location:	RMT Job Number:	Sampling Program:	Analytical Program	TRRP Report Required?	Dry Weight Reporting Re	Special Reporting Limits

Time	Time	Time	Time
Date	Date	Date	Date
Signature	Signature	Signature	Signature

	RESV		Cool 4°C	Cool 4°C	Cool 4°C				
NALYSIS	Naphthalene	SW-8270C	Þ	Þ	Þ				m
4	2-Methyl- naphthalene	SW-8270C	Þ	D	Þ				m
CONTAINER	1-Liter Amber Glass	no treat	2	7	2				9
		MEDIA	Groundwater	Groundwater	Groundwater				
irters 1, 2, 3, & 4 of 2006	ECIFICS	TIME							TOTALS
mpling Performed in Qua	SAMPLE SP	DATE							MPLE ENTRY
Sai		SAMPLE ID	MW-1	R-1	MW-3				NOT A SAI



