

NM1 - 19

C-138

YEAR(S):

1997 - 1995

O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
511 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 8/8/95

RECEIVED

DEC 31 1997

Submit Original
Plus 1 Copy
to appropriate
District Office

Environmental Bureau
Oil Conservation Division

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator UNICHEM
Verbal Approval Received: Yes ☐ No ☒	5. Originating Site Borger, Tex
2. Management Facility Destination 34 Miles West of Tatum	6. Transporter Gandy Corp.
3. Address of Facility Operator Box 1658, Roswell, NM 88202	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 408 Industrial Blvd.	Borger, Texas
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Waste Generated from a 55 gallon drum that leaked onto the property. Dirt from cleanup

WILL NEED SIGNATURE C-O-C, TYPE OF CHEMICAL? LWP
CALLED LARRY GANDY 12/10/97-1990 TIME APPROVAL SIGN!

DEC 18 1997

Estimated Volume 20 cy Known Volume (to be entered by the operator at the end of the haul) cy

SIGNATURE: Larry Gandy TITLE: Vice-President DATE: 12-10-97
Waste Management Facility Authorized Agent
TYPE OR PRINT NAME: LARRY GANDY TELEPHONE NO. 505-398-4960

(This space for State Use)

APPROVED BY: [Signature] TITLE: Env. Eng'g DATE: 12/19/97

APPROVED BY: [Signature] TITLE: Env. Geologist DATE: 12/31/97

SEP 1967
Received
Hobbs
000



THE REPRODUCTION OF

THE

FOLLOWING

DOCUMENT (S)

CANNOT BE IMPROVED

DUE TO

THE CONDITION OF

THE ORIGINAL

DEC 18 '97 15:28 FR UNICHEM PROD. S & E 505 393 1150 TO 15122395410
12-18-1997 15:28

P.01/01

P.02



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

ONE-TIME SHIPMENT REQUEST FOR TEXAS WASTE CODE
FOR SHIPMENT OF
CLASS 1, 2, 3 AND EPA HAZARDOUS WASTE

Partners in the generator notification requirements of the TAC Section 300.5, the generator of a solid waste is required to submit to the TNRCC detailed written information regarding the composition and characteristics of the waste. Please complete all applicable sections. Incomplete forms will delay processing. Assigned waste codes cannot be changed without prior approval from the TNRCC.

PAY MOOSE
UNICHEM, A DIVISION OF BJ SERVICES COMPANY, USA
707 N. LEECH
BOSS, NM 88240

Please type or print legibly:

GENERATOR CONTACT PERSON
GENERATOR COMPANY NAME
GENERATOR MAILING ADDRESS
CITY, STATE, ZIP CODE
PHONE NO. (505) 391-2317
FAX NO. (505) 391-1150

COMPLETE ONLY IF NOT SHIPPED

Are you a generator? ☐ Yes ☒ NoIf checked, have you submitted TNRCC form notification to the TNRCC-3000? ☐ Yes ☒ No

Date submitted:

COMPLETE ONLY IF SHIPPED

Date waste shipped to:

U.S. EPA Notification No.

Generating Site Location (if other than above) 408 INDUSTRIAL BLVD, BOSS, TX 79007

Designated Treatment, Storage, and/or Disposal Facility Name and Address GANDY MARLEY, INC.; 3/4 MILES WEST OF
TATUM, HIGHWAY 380 (P.O. BOX 827; TATUM, NM 88267)DESCRIPTION OF WASTE
(see and use DOT description or trade name)

- CONTAMINATED DIRT
-
-
-

TNRCC USE ONLY

For TNRCC use only if
this waste is not shipped

TEXAS WASTE CODES

FORM CODE	CLASS CODE	ENV CODE	HAZAR CODE
0489	1	--	2

GENERATOR/REPRESENTATIVE

I certify that the above information is correct to the best of my knowledge.

I, PAMELA J. MOOSE, am employed by
(Please Print Name)

UNICHEM (Please Print Name and Mailing Address)

UNICHEM
P.O. BOX 1499
BOSS, NM 88240

I am authorized to sign this notification for

UNICHEM

Pamela J. Moose
Signature

12/10/97

505 391-2317

Please Print Name

THE FOLLOWING FORM IS REQUIRED

DEC 18 '97 14:44

DEC 11 '97 07:28

PAGE 02

** TOTAL PAGE.01 **

PAGE. 02

** TOTAL PAGE.02 **

Not signed
by TNRCC

GANDY CORPORATION

OILFIELD SERVICES

P. O. BOX 827

TATUM, NEW MEXICO 88267

(505) 398-4960

LOVINGTON FAX NO.
(505) 396-6887TATUM FAX NO.
(505) 398-6887

FAX COVER SHEET MESSAGE TO FOLLOW

DATE: 12-12-97 TIME: 10:20TOTAL NUMBER OF PAGES INCLUDING COVER SHEET: 2TO:
COMPANY: DCDATTENTION: Wayne PriceFAX NO. 393 0720FROM:
SENDER: GANDY CORPORATIONMESSAGE: Please attach to Unichems C135ThanksLarry

```

*****
*                                     P. 01                                *
*                                     TRANSACTION REPORT                      *
*                                     DEC-12-97 FRI 11:49 AM                  *
*                                     FOR: OCD HOBBS                          *
*                                     15053930720                            *
*-----*-----*-----*-----*-----*-----*-----*-----*-----*
*   DATE   START  SENDER           RX TIME  PAGES  TYPE      NOTE          *
*-----*-----*-----*-----*-----*-----*-----*-----*-----*
*   DEC-12 11:47 AM 1 505 398 6887    1'45"    2  RECEIVE      OK           *
*-----*-----*-----*-----*-----*-----*-----*-----*-----*
*****

```

GANDY MARLEY, INC.
P. O. BOX 827
TATUM, NEW MEXICO 88267
TATUM, NEW MEXICO ROSWELL, NEW MEXICO

CERTIFICATE OF WASTE STATUS

OILFIELD NON-EXEMPT WASTE MATERIAL

Originating Location: UNICHEM, 408 INDUSTRIAL BLVD.; BORGER, TX 79007

Source: WASTE GENERATED FROM A 55 GALLON DRUM THAT LEAKED ONTO THE PROPERTY.
DIRT FROM CLEAN UP.

Disposal Location: 34 MILES WEST TATUM HIGHWAY 380

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for UNICHEM, A DIVISION OF RJ SERVICES COMPANY, USA concur with the status of the waste from the subject site.

Name PAMELA J. MOOSE
Title/Agency ENVIRONMENTAL COMPLIANCE COORDINATOR
UNICHEM
Address 707 N. LEECH; HOBBS, NM 88240
Signature Pamela J. Moose
Date 12-10-97



UNICHEM

A Division of BJ Services Company

INTEROFFICE MEMORANDUM

July 2, 1997

TO: Danny Alexander, T. Mike Jones, D.V. Edwards, Lloyd Brown

FROM: Pam Moose 

SUBJECT: CESQG GENERATOR STATUS

File the attached letter in your facility file. This will change the information that goes on a manifest. Listed below are the types of changes. Discuss this with all personnel that handles waste shipments for your facility.

1. **State ID number:** On all manifest use "CESQG" for the state ID number. This is located in section B of the manifest.
2. **Texas state code:** There is a waste code for each waste stream. On each current waste stream the first four digits will be replaced with "CESQ." This is located in section I of the manifest.

Example: Non-Hazardous waste

Current waste code -- 07004891
Replace with -- CESQ4891

The manifest is already filled out on each waste shipment; however the person that is signing the manifest should be familiar with the changes.

If you have any questions, please call.

:pm

Attachments

cc: Charlie Root
Burl Fuller
Terry Jacobs

UNICHEM

A Division of BJ Services Company

*Hobbs facility file
Pam Moore*

June 5, 1997

Texas Natural Resource Conservation Commission
Waste Evaluation Section, MC 129
Industrial and Hazardous Waste Division
PO Box 13087
Austin, TX 78711-3087

RE: Unichem, Borger, TX Facility
TNRCC ID# 38767
Removal from TNRCC Database

Dear Sirs:

Our Borger facility has been classified as a non-industrial conditionally exempt small quantity generator (CESQG) for several years. Please remove our Borger facility from your registration database. In the future, all waste disposed off-site will be identified on relevant documents by the facility number "CESQG" and waste identification numbers will begin with "CESQ" as the sequence number followed by the appropriate form code and classification.

Thank you for your cooperation. Please call if you have any questions.

Sincerely,

Charles N. Root

Charles N. Root
Manager, EHS

cc: James Knoll, TNRCC, Amarillo Office

Dec-03-97 08:26A

P.01

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

ANALYTICAL RESULTS FOR
UNICHEM

Attention: Pam Moose

707 N. Leech

Hobbs, NM 88240

December 02, 1997

Receiving Date: 11/12/97

Sample Type: Soil

Project No: Borg 11-97

Project Location: Borger Warehouse

Extraction Date: 11/12/97

Analysis Date: 11/13/97

Sampling Date: 11/11/97

Sample Condition: I & C

Sample Received by: VW

Project Name: UI 7250 Spill

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T85122 Borg 11-97 S	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	92	0	0	115
1,4-Dichlorobenzene	7.5	0.05	ND	93	3	39	116
o-Cresol	200.0	0.05	ND	94	15	58	118
m,p-Cresol	200.0	0.05	ND	86	23	144	108
Total Cresol	200.0	0.05	ND	—	—	—	—
Hexachloroethane	3.0	0.05	ND	92	6	48	115
Nitrobenzene	2.0	0.05	ND	88	9	70	110
Hexachlorobutadiene	0.5**	0.05	ND	94	2	48	118
2,4,6-Trichlorophenol	2.0	0.05	ND	81	12	53	101
2,4,5-Trichlorophenol	400.0	0.05	ND	86	2	48	108
2,4-Dinitrotoluene	0.13**	0.05	ND	92	11	78	115
2,4-D	10.0	0.05	ND	79	0	206	99
Hexachlorobenzene	0.13**	0.05	ND	87	9	100	109
2,4,5-TP	1.0**	0.05	ND	83	2	330	91
Pentachlorophenol	100.0	0.05	ND	86	0	0	108

Surrogates

% RECOVERY

2-Fluorophenol	44
Phenol-d6	30
Nitrobenzene-d5	59
2-Fluorobiphenyl	61
2,4,6-Tribromophenol	51
Terphenyl-d14	103

*NOTE: Surrogate recovery out of standard range.

ND - Not Detected

Methods: EPA SW 846-1311, 8270, 8080.

CHEMIST: RP/HW


 Director, Dr. Blair Leftwich

 12-2-97
 DATE

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

Dec-03-97 08:26A



5701 Alameda Avenue

Lubbock, Texas 79424

806-754-1236 FAX 806-794-1298

ANALYTICAL RESULTS FOR

UNICHEM

Attention: Pam Moose

707 N. Leech

Hobbs, NM 88240

November 18, 1997

Receiving Date: 11/12/97

Sample Type: Soil

Project No: Borg 11-97

Project Location: Borg Warehouse

Extraction Date: 11/13/97
Analysis Date: 11/13/97
Sampling Date: 11/11/97
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: U8 7250 Spill

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	IGNITABILITY
T85122 QC	EPA LIMIT =	—	500	250	—	<2 >12.5	—
	Borg 11-97 S	Non-reactive	<10	<2.5	Non-corrosive	8.0	Nonignitable
	Quality Control	—	—	—	—	8.0	—
RPD		0	0	0	0	0	0
% Extraction Accuracy		—	—	—	—	—	—
% Instrument Accuracy		—	—	—	—	100	—

METHODS: EPA SW 846-2.1.3, 2.1.2, 2.1.1.
CHEMIST: JG

B2

11-18-97

Director, Dr. Blair Leftwich

DATE

Dec-03-97 08:26A

P.03



3701 Abernethy Avenue
Lubbock, Texas 79424
805-794-1256
FAX 806-794-1256

ANALYTICAL RESULTS FOR

UNICHEM

Attention: Pam Moose
707 N. Leech
Hobbs, NM 88240

November 18, 1997

Receiving Date: 11/12/97

Sample Type: Soil

Project No: Borg 11-97

Project Location: Borg Warehouse

Extraction Date: 11/12/97

Analysis Date: 11/13/97

Sampling Date: 11/11/97

Sample Condition: Intact & Cool

Sample Received by: VW

Project Name: UI 7250 Spill

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cd	Cr	Pb	Ag	Ba	Hg
EPA LIMIT =									
T85122	Borg 11-97 S	5.0	1.0	1.0	5.0	5.0	5.0	100.0	0.20
QC	Quality Control	<0.10	<0.10	<0.02	<0.05	<0.10	<0.01	1.8	<0.01
		5.3	5.0	5.1	5.0	5.0	0.98	5.2	0.05
Reporting Limit		0.10	0.10	0.02	0.05	0.1	0.01	0.20	0.01
RPD		3	2	2	1	1	3	2	0
% Extraction Accuracy		100	102	92	98	102	82	95	110
% Instrument Accuracy		105	99	102	100	100	98	104	100

CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba: RR Hg: JT

METHODS: EPA SW 846-1311, 6010B, 7470.

TCLP METALS SPIKE: 2.0 mg/L As, Se, Cd, Cr, Pb, Ba: 1.0 mg/L Ag: 0.05 mg/L Hg.

TCLP METALS QC: 5.0 mg/L As, Se, Cd, Cr, Pb, Ba: 1.0 mg/L Ag: 0.05 mg/L Hg.

FL

Director, Dr. Blair Leftwich

11-18-97

Date

Dec-03-97 08:27A

6701 Aberdeen Avenue
Lubbock, Texas 79424
806-794-1296
FAX 806-794-1798

ANALYTICAL RESULTS FOR
Unichem International
Attention: Pam Moose
707 N. Leech
Hobbs NM 88240

Date: Nov 17, 1997
Date Rec: 11/12/97
Project: Borg 11-97
Proj Name: UI 7250 Spill
Proj Loc: Borger Warehouse

Lab Receiving #: 9711000153
Sampling Date: 11/11/97
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Vol in Soil (mg/L)	EPA Limit	Reporting Limit	Method Blank	T85122 Borg 11-97 S	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	100	17	82	100
1,1-Dichloroethene	0.7	0.05	ND	ND	100	11	83	100
Methyl Ethyl Ketone	200.0	0.50	ND	ND	102	16	70	102
Chloroform	6.0	0.05	ND	ND	97	18	85	97
1,2-Dichloroethane	0.5	0.05	ND	ND	99	17	86	99
Benzene	0.5	0.05	ND	ND	98	16	81	98
Carbon Tetrachloride	0.5	0.05	ND	ND	117	7	106	117
Trichloroethene	0.5	0.05	ND	ND	100	16	86	100
Tetrachloroethane	0.7	0.05	ND	ND	97	16	84	97
Chlorobenzene	100.0	0.05	ND	ND	98	18	83	98
1,4-Dichlorobenzene	7.5	0.05	ND	ND	100	18	83	100

* RECOVERY

Bromofluoromethane	97
toluene-d8	97
Bromofluorobenzene	96

EST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
CLP Vol	EPA 1311	11/13/97	EPA 8260	11/13/97	RP	100 ea	100 ea

PS
Director, Dr. Blair Leftwich

11-17-97
Date

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

Dec-03-97 08:27A

P.05

6701 Aberdeen Avenue

Lubbock, Texas 79424

806-794-1296

FAX 806-794-1298

CLIENT Unichem

408 Industrial Blvd

Borger, TX 79007

ANALYTICAL REPORT

SAMPLE NO. : 85122

INVOICE NO.: TE0177

REPORT DATE: 11-20-97

REVIEWED BY:

PAGE : 1 OF 2

CLIENT SAMPLE ID : Borg 11-97 S
 SAMPLE TYPE: soil
 SAMPLED BY: D. Gray
 SUBMITTED BY: --
 SAMPLE SOURCE: Borger Warehouse
 ANALYST: K. Costa

AUTHORIZED BY : P. MOOSE
 CLIENT P.O. : --
 SAMPLE DATE ...: 11-11-97
 SUBMITTAL DATE : 11-13-97
 EXTRACTION DATE: 11-18-97
 ANALYSIS DATE ..: 11-18-97

TCLP Pesticides by EPA 8081A**D A T A T A B L E**

Parameter	Result	Unit	Detection Limit
Chlordane	<0.03	mg/L	0.03
Endrin	<0.02	mg/L	0.02
Heptachlor	<0.008	mg/L	0.008
Lindane	<0.4	mg/L	0.4
Methoxychlor	<10.	mg/L	10.
Heptachlor epoxide	<0.008	mg/L	0.008
Toxaphene	<0.5	mg/L	0.5

TRACE ANALYSIS, INC.

(1) copy to client

A Laboratory for Advanced Environmental Research and Analysis

Dec-03-97 08:27A

P.06

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1298

FAX 806•794•1298

CLIENT Unichem

408 Industrial Blvd

Borger, TX 79007

ANALYTICAL REPORT

SAMPLE NO. : 85122

INVOICE NO.: TE0177

REPORT DATE: 11-20-97

REVIEWED BY: *WJ*

PAGE : 2 OF 2

DATA TABLE

(Cont.)

Surrogate Information -

	<u>Percent</u> <u>Recovery</u>	<u>Range</u>
Tetrachloro-m-Xylene	76.4	39-119
Decachlorobiphenyl	73.5	41-120

TRACE ANALYSIS, INC.

(1) copy to client

A Laboratory for Advanced Environmental Research and Analysis

** TOTAL PAGE.07 **



THE REPRODUCTION OF

THE

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DOCUMENT (S)

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THE ORIGINAL

District I - (505) 333-0101
P.O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

NEW MEXICO
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 8/8/95

Submit Original
Plus 1 Copy
to appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator UNICHEM
Verbal Approval Received: Yes ☐ No ☒	5. Originating Site Borger, Tex
2. Management Facility Destination 34 Miles West of Tatum	6. Transporter Gandy Corp.
3. Address of Facility Operator Box 1658, Roswell, NM 88202	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 408 Industrial Blvd.	Borger, Texas
9. <u>Circle One</u> : A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. ☒ B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Waste Generated from a 55 gallon drum that leaked onto the property. Dirt from cleanup

Estimated Volume 20 cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: [Signature] TITLE: Vice-President DATE: 12-10-97
Waste Management Facility Authorized Agent
TYPE OR PRINT NAME: LARRY GANDY TELEPHONE NO. 505-398-4960

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: _____
APPROVED BY: _____ TITLE: _____ DATE: _____

GANDY MARLEY, INC.
P. O. BOX 827
TATUM, NEW MEXICO 88267
TATUM, NEW MEXICO ROSWELL, NEW MEXICO

CERTIFICATE OF WASTE STATUS
GILFIELD NON-EXEMPT WASTE MATERIAL

Originating Location: UNICHEM, 408 INDUSTRIAL BLVD.; BORGER, TX 79007

Source: WASTE GENERATED FROM A 55 GALLON DRUM THAT LEAKED ONTO THE PROPERTY.
DIRT FROM CLEAN UP.

Disposal Location: 34 MILES WEST TATUM HIGHWAY 380

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for UNICHEM, A DIVISION OF BJ SERVICES COMPANY, USA concur with the status of the waste from the subject site.

Name PAMELA J. MOOSE
Title/Agency ENVIRONMENTAL COMPLIANCE COORDINATOR
UNICHEM
Address 707 N. LEECH; HOBBS, NM 88240
Signature 
Date 12-10-97

UNICHEM

A Division of BJ Services Company

INTEROFFICE MEMORANDUM

July 2, 1997

TO: Danny Alexander, T. Mike Jones, D.V. Edwards, Lloyd Brown

FROM: Pam Moose *PM*

SUBJECT: CESQG GENERATOR STATUS

File the attached letter in your facility file. This will change the information that goes on a manifest. Listed below are the types of changes. Discuss this with all personnel that handles waste shipments for your facility.

1. **State ID number:** On all manifest use "CESQG" for the state ID number. This is located in section B of the manifest.
2. **Texas state code:** There is a waste code for each waste stream. On each current waste stream the first four digits will be replaced with "CESQ." This is located in section I of the manifest.

Example: Non-Hazardous waste

Current waste code -- 07004891
Replace with -- CESQ4891

The manifest is already filled out on each waste shipment; however the person that is signing the manifest should be familiar with the changes.

If you have any questions, please call.

:pm

Attachments

cc: Charlie Root
Burl Fuller
Terry Jacobs

UNICHEM

A Division of BJ Services Company

*Hobbs facility file
Pam Moore*

June 5, 1997

Texas Natural Resource Conservation Commission
Waste Evaluation Section, MC 129
Industrial and Hazardous Waste Division
PO Box 13087
Austin, TX 78711-3087

RE: Unichem, Borger, TX Facility
TNRCC ID# 38767
Removal from TNRCC Database

Dear Sirs:

Our Borger facility has been classified as a non-industrial conditionally exempt small quantity generator (CESQG) for several years. Please remove our Borger facility from your registration database. In the future, all waste disposed off-site will be identified on relevant documents by the facility number "CESQG" and waste identification numbers will begin with "CESQ" as the sequence number followed by the appropriate form code and classification.

Thank you for your cooperation. Please call if you have any questions.

Sincerely,

Charles N. Root

Charles N. Root
Manager, EHS

cc: James Knoll, TNRCC, Amarillo Office

Dec-03-97 08:26A

P.01

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

ANALYTICAL RESULTS FOR
UNICHEM

Attention: Pam Moose

707 N. Leech

Hobbs, NM 88240

December 02, 1997

Receiving Date: 11/12/97

Sample Type: Soil

Project No: Borg 11-97

Project Location: Borger Warehouse

Extraction Date: 11/12/97

Analysis Date: 11/13/97

Sampling Date: 11/11/97

Sample Condition: I & C

Sample Received by: VW

Project Name: UI 7250 Spill

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T85122 Borg 11-97 S	ac	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	92	0	0	115
1,4-Dichlorobenzene	7.5	0.05	ND	93	3	39	116
o-Cresol	200.0	0.05	ND	94	15	58	118
m,p-Cresol	200.0	0.05	ND	86	23	144	108
Total Cresol	200.0	0.05	ND	---	---	---	---
Hexachloroethane	3.0	0.05	ND	92	6	48	115
Nitrobenzene	2.0	0.05	ND	88	9	70	110
Hexachlorobutadiene	0.5**	0.05	ND	94	2	48	118
2,4,6-Trichlorophenol	2.0	0.05	ND	81	12	53	101
2,4,5-Trichlorophenol	400.0	0.05	ND	86	2	48	108
2,4-Dinitrotoluene	0.13**	0.05	ND	92	11	78	115
2,4-D	10.0	0.05	ND	79	0	206	99
Hexachlorobenzene	0.13**	0.05	ND	87	9	100	109
2,4,5-TP	1.0**	0.05	ND	83	2	330	91
Pentachlorophenol	100.0	0.05	ND	86	0	0	108

Surrogates

% RECOVERY

2-Fluorophenol	44
Phenol-d6	30
Nitrobenzene-d5	59
2-Fluorobiphenyl	61
2,4,6-Tribromophenol	51
Terphenyl-d14	103

*NOTE: Surrogate recovery out of standard range.

ND - Not Detected

Methods: EPA SW 846-1311, 8270, 8080.

CHEMIST: RP/HW

RP

12-2-97

Director, Dr. Blair Leftwich

DATE

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

Dec-03-97 08:26A

P.02

ULTRACLEAN ANALYSIS, INC.

5701 Alameda Avenue

Lubbock, Texas 79424

806-754-1236

FAX 806-794-1298

ANALYTICAL RESULTS FOR

UNICHEM

Attention: Pam Moose

707 N. Leech

Hobbs, NM 88240

November 18, 1997

Receiving Date: 11/12/97

Sample Type: Soil

Project No: Borg 11-97

Project Location: Borg Warehouse

Extraction Date: 11/13/97

Analysis Date: 11/13/97

Sampling Date: 11/11/97

Sample Condition: Intact & Cool

Sample Received by: VW

Project Name: UH 7250 Spill

REACTIVITY SULFIDES (ppm) CYANIDES (ppm) CORROSIVITY pH (s.u.) IGNITABILITY

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	IGNITABILITY
T85122	EPA LIMIT =	—	500	250	—	<2 >12.5	—
QC	Borg 11-97 S	Non-reactive	<10	<2.5	Non-corrosive	8.0	Nonignitable
	Quality Control	—	—	—	—	8.0	—

RPD

% Extraction Accuracy

% Instrument Accuracy

0

0

0

0

0

0

METHODS: EPA SW 846-2.1.3, 2.1.2, 2.1.1.

CHEMIST: JG

Director, Dr. Blair Leftwich

DATE

11-18-97

Dec - 03 - 97 08:26A

P.03

TRACE ANALYSIS, INC.

3701 Aberdeen Avenue

Lubbock, Texas 79424

805 • 794 • 1256

FAX 905 • 754 • 1298

ANALYTICAL RESULTS FOR

UNICHEM

Attention: Pam Moose

707 N. Leech

Hobbs, NM 88240

November 18, 1997

Receiving Date: 11/12/97

Sample Type: Soil

Project No: Borg 11-97

Project Location: Borgers Warehouse

Extraction Date: 11/12/97

Analysis Date: 11/13/97

Sampling Date: 11/11/97

Sample Condition: Intact & Cool

Sample Received by: VW

Project Name: UI 7250 Spill

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cd	Cr	Pb	Ag	Ba	Hg
EPA LIMIT =									
T85122	Borg 11-97 S	5.0	1.0	1.0	5.0	5.0	5.0	100.0	0.20
QC	Quality Control	<0.10	<0.10	<0.02	<0.05	<0.10	<0.01	1.8	<0.01
		5.3	5.0	5.1	5.0	5.0	0.98	5.2	0.05
Reporting Limit		0.10	0.10	0.02	0.05	0.1	0.01	0.20	0.01
RPD		3	2	2	1	1	3	2	0
% Extraction Accuracy		100	102	92	98	102	82	95	110
% Instrument Accuracy		105	99	102	100	100	98	104	100

CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba: RR Hg: JT

METHODS: EPA SW 846-1311, 6010B, 7470.

TCLP METALS SPIKE: 2.0 mg/L As, Se, Cd, Cr, Pb, Ba: 1.0 mg/L Ag: 0.05 mg/L Hg.

TCLP METALS QC: 5.0 mg/L As, Se, Cd, Cr, Pb, Ba: 1.0 mg/L Ag: 0.05 mg/L Hg.



Director, Dr. Blair Leftwich

11-18-97

Date

Dec-03-97 08:27A

P.04

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
Unichem International
Attention: Pam Moose
707 N. Leech
Hobbs NM 88240

Date: Nov 17, 1997
Date Rec: 11/12/97
Project: Borg 11-97
Proj Name: UI 7250 Spill
Proj Loc: Borger Warehouse

Lab Receiving # : 9711000153
Sampling Date: 11/11/97
Sample Condition: Intact and Cool
Sample Received By: VW

TCLP Vol in Soil (mg/L)	EPA Limit	Reporting Limit	Method Blank	T85122 Borg 11-97 S	QC	RPD	%EA	%IA
Vinyl Chloride	0.2	0.05	ND	ND	100	17	82	100
1,1-Dichloroethane	0.7	0.05	ND	ND	100	11	83	100
Methyl Ethyl Ketone	200.0	0.50	ND	ND	102	16	76	102
Chloroform	6.0	0.05	ND	ND	97	18	85	97
1,2-Dichloroethane	0.5	0.05	ND	ND	99	17	86	99
Benzene	0.5	0.05	ND	ND	98	16	81	98
Carbon Tetrachloride	0.5	0.05	ND	ND	117	7	106	117
Trichloroethene	0.5	0.05	ND	ND	100	16	86	100
Tetrachloroethane	0.7	0.05	ND	ND	97	16	84	97
Chlorobenzene	100.0	0.05	ND	ND	98	18	83	98
1,4-Dichlorobenzene	7.5	0.05	ND	ND	100	18	83	100

% RECOVERY

Bromofluoromethane 97
Toluene-d8 97
Bromofluorobenzene 96

EST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
CLP Vol	EPA 1311	11/13/97	EPA 8260	11/13/97	RP	100 ea	100 ea

PS
Director, Dr. Blair Leftwich

11-17-97
Date

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

Dec-03-97 08:27A

P.05

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

CLIENT Unichem

408 Industrial Blvd

Borger, TX 79007

ANALYTICAL REPORT

SAMPLE NO. : 85122

INVOICE NO.: TE0177

REPORT DATE: 11-20-97

REVIEWED BY: *[Signature]*

PAGE : 1 OF 2

CLIENT SAMPLE ID : Borg 11-97 S
 SAMPLE TYPE: soil
 SAMPLED BY: D. Gray
 SUBMITTED BY: --
 SAMPLE SOURCE: Borger Warehouse
 ANALYST: K. Costa

AUTHORIZED BY : P. MOOSE
 CLIENT P.O. : --
 SAMPLE DATE: 11-11-97
 SUBMITTAL DATE : 11-13-97
 EXTRACTION DATE: 11-18-97
 ANALYSIS DATE ..: 11-18-97

TCLP Pesticides by EPA 8081A**D A T A T A B L E**

Parameter	Result	Unit	Detection Limit
Chlordane	<0.03	mg/L	0.03
Endrin	<0.02	mg/L	0.02
Heptachlor	<0.008	mg/L	0.008
Lindane	<0.4	mg/L	0.4
Methoxychlor	<10.	mg/L	10.
Heptachlor epoxide	<0.008	mg/L	0.008
Toxaphene	<0.5	mg/L	0.5

TRACE ANALYSIS, INC.

(1) copy to client

A Laboratory for Advanced Environmental Research and Analysis

1150

Dec-03-97 08:27A

P.06

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1298

FAX 806•794•1298

CLIENT Unichem

408 Industrial Blvd

Borger, TX 79007

ANALYTICAL REPORT

SAMPLE NO. : 85122

INVOICE NO.: TE0177

REPORT DATE: 11-20-97

REVIEWED BY: *WJ*

PAGE : 2 OF 2

DATA TABLE

(Cont.)

Surrogate Information -

	<u>Percent Recovery</u>	<u>Range</u>
Tetrachloro-m-Xylene	76.4	39-119
Decachlorobiphenyl	73.5	41-120

TRACE ANALYSIS, INC.

(1) copy to client

A Laboratory for Advanced Environmental Research and Analysis

** TOTAL PAGE.07 **

TraceAnalysis, Inc.

6701 Aberdeen Avenue, Ste. 9 Lubbock, Texas 79424
 Tel (806) 794 1296 Fax (806) 794 1298
 1 (800) 378 1286

Company Name: Unichem Phone #: 806 273 6531
 Address: 408 Industrial Blvd Borger TX 79007 Fax #: 806 273 6531
 Contact Person: Pam moose 505 391-2317
 Invoice to: Same

Project #: Borg 11-97 Project Name: UT 750 spill
 Project Location: Borger Warehouse Sampler Signature: [Signature]

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX				PRESERVATIVE METHOD				DATE	TIME
				WATER	SOIL	AIR	SLUDGE	HCL	HNO3	ICE	NONE		
Borg 11-97 5		1	802	X						X		11-11-97	3:30pm

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received by:	Date:	Time:

Received at Laboratory by: [Signature]

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Lab Order ID # 15053986887

ANALYSIS REQUEST

(Circle or Specify Method No.)

MTBE 8020/602	
BTEX 8020/602	
TPH	
PAH 8270	
Total Metals Ag As Ba Cd Cr Pb Hg Se	X
TCLP Metals Ag As Ba Cd Cr Pb Hg Se	X
TCLP Volatiles	XXX
TCLP Semi Volatiles	XXX
RCI	X
GC/MS Vol. 8240/8260/624	
GC/MS Semi. Vol. 8270/625	
PCB's 8080/608	
Pest. 8060/608	
BOD, TSS, PH	
Turn Around Time if different from standard	X

LAB. USE ONLY	REMARKS:
Initial Y/N	ASAP results fax back to Pam Moose 505 393 1150
Revised Y/N	
Temp. Y/N	
Log in Review	

* P. 01 *
* TRANSACTION REPORT *
* DEC-19-97 FRI 9:41 AM *
* FOR: OCD HOBBS 15053930720 *
*
* DATE START RECEIVER TX TIME PAGES TYPE NOTE *
* DEC-19 9:40 AM 17008278177 40" 1 SEND OK *

707 N. LEECH
HOBBS, NM 88240
Phone: 505/391-2317
Fax: 505/393-1150

UNICHEM

Fax

To: WAYNE PRICE**From:** PAMELA J MOOSE**Fax:** 393-0720**Date:** December 19, 1997**Phone:****Pages:** 9**Re:****CC:**

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

-Comments:

I SPOKE WITH LARRY GANDY TODAY AND HE SAID YOU NEED AN MSDS, AND PRODUCT BULLETIN. THE FOLLOWING PAGES IS THE MSDS AND PB. I AM SORRY FOR THE DELAY, I HAVE BEEN OUT ON VACATION.

ALSO, I LEFT INSTRUCTION TO HAVE THE TNRCC PAPERWORK FAXED BACK TO LARRY. I UNDERSTAND THIS WAS DONE BUT WITH NO SIGNATURE. THE FAX SHEET FROM THE TNRCC SHOULD HAVE BEEN FAXED AND THIS EXPLAINS WHY NO SIGNATURE WAS ON FORM. NO NUMBER IS REQUIRED. SEE COVER SHEET FROM THE TNRCC.

LARRY WILL GIVE YOU A CALL LATER TODAY AND CHECK ON STATUS. IF YOU NEED ANYTHING ELSE, PLEASE LET ME KNOW.

M A T E R I A L S A F E T Y D A T A S H E E T

PAGE 1

Product Name: UNICHEM 7250

Section: 01 PRODUCT IDENTIFICATION

UNICHEM	Emergency Telephone	505-393-7751
A DIVISION OF BJ SERVICES CO.	Previous Version Date	9/21/93
707 N. LEECH	Date Prepared	10/01/96
HOBBS, NM 88241-1499	Version: 0000005	

Product Name: UNICHEM 7250

Chemical Description:

Proprietary blend of nonionic and anionic surfactants in aromatic solvent

Section: 02 HAZARDOUS INGREDIENTS

Component Name	CAS#	% Range
heavy aromatic distillate	67891-79-6	< 60%
4,7-methano-1H-indene, octahydro	06004-38-2	< 30%
isopropyl alcohol	00067-63-0	< 20%
ethyl benzene	00100-41-4	< 10%
2-methylstyrene	00611-15-4	< 10%
aromatic hydrocarbon solvent	64742-94-5	< 10%
ethyl toluene	25550-14-5	< 10%
bicycloheptane,2-methyl-3(1-methyl ethylenyl)isomer	62337-89-7	< 5%
n-propyl benzene	00103-65-1	< 5%
xylene	01330-20-7	< 5%
naphthalene	00091-20-3	< 5%
cumene	00098-82-8	< 5%
1,2,3,4-tetrahydronaphthalene (tetralin)	00119-64-2	< 5%
2-ethyl-bicyclo-(2,2,1)-heptane	02146-41-0	< 5%
bicycloheptane, 2-butyldiene	62211-86-3	< 5%

Section: 03 PHYSICAL DATA

Freezing Point: - 40 Deg.F.
Boiling Point, 760 mm Hg: appx 300 Deg.F
Specific Gravity(H₂O=1) : 0.928 Solubility in water: Insoluble
Appearance and Odor: Clear, amber liquid; aromatic odor.

Section: 04 FIRE AND EXPLOSION HAZARD DATA

Flash Point (Test Method): 66 Deg.F TCCExtinguishing Media

CO₂, dry chemical, water spray or fog, or foam. Use water to keep containers cool. Isolate "fuel" supply from fire.
Contain fire fighting liquids for proper disposal.

Special Fire Fighting Procedures

Do not enter confined fire space without proper personal protective equipment including NIOSH approved self-contained

M A T E R I A L S A F E T Y D A T A S H E E T

PAGE 2

Product Name: UNICHEM 7250

Section: 04 FIRE AND EXPLOSION HAZARD DATA CONTINUED

breathing apparatus with full facepiece operated in the positive pressure demand mode. Do not inject a solid stream of water or foam into hot, burning pools; this may cause splattering and increase fire intensity. Evacuate personnel to a safe area. Keep unnecessary people away.

Unusual Fire and Explosion Hazards

This material is volatile and readily gives off vapors that may travel along the ground or be moved by ventilation and ignited by pilot lights, other flames, sparks, heaters, smoking, electrical motors, static discharge, or other ignition sources at locations distant from material handling point. Never use welding or cutting torch on or near drum (even empty) because product (even just residue) can ignite explosively. Containers may explode from internal pressure if confined to fire. Keep containers cool. Keep unnecessary people away.

Section: 05 HEALTH HAZARD DATA
-----Effects of Overexposure

- Eye Contact: the liquid is irritating to the eyes and produces intense stinging and burning. If not promptly removed, may cause eye damage.
- Skin Contact: can cause moderate irritation including pain or a feeling of heat, discoloration, swelling and blistering. Repeated or prolonged contact with the skin may cause irritation and dermatitis.
- Inhalation: vapors may cause irritation of the eyes, nose, and throat. Prolonged exposures may cause nausea, headache, mild narcosis, dizziness, lightheadedness, loss of appetite, weakness and loss of coordination. Can cause pulmonary edema and bronchial emphysema.
- Ingestion: can cause burning of the gastrointestinal tract, nausea, vomiting, bleeding, CNS depression, hemolysis, and pulmonary damage. If aspirated into the lungs, can cause severe injury to the lungs and death.

Emergency and First Aid ProceduresSKIN

Wash with soap and water. Remove contaminated clothing and launder contaminated clothing before reuse. Get medical attention if redness or irritation develops.

EYES

Flush eyes immediately with large amounts of water for at least 15 minutes. Lift lower and upper lids occasionally. Get medical attention.

INHALATION

M A T E R I A L S A F E T Y D A T A S H E E T

PAGE 3

Product Name: UNICHEM 7250

Section: 05 HEALTH HAZARD DATA

CONTINUED

Remove victim to fresh air. Give artificial respiration if not breathing. If breathing is difficult, administer oxygen. Keep person warm, quiet and get medical attention.

INGESTION

Call a physician immediately. Give victim a glass of water. Do NOT induce vomiting unless instructed by a physician or poison control center. Never give anything by mouth to an unconscious person.

Section: 06 REACTIVITY DATA

Stable (Y=Yes/N=No): YStability -- Conditions to Avoid

None known.

Incompatibility (Materials to Avoid)

Avoid contact with strong oxidizing agents, strong alkalies, and strong mineral acids.

Hazardous Decomposition Products

Thermal decomposition or combustion may produce smoke, carbon monoxide and carbon dioxide.

Hazardous Polymerization May Occur (Y=Yes/N=No): NHazardous Polymerization -- Conditions to Avoid

None

Section: 07 SPILL OR LEAK PROCEDURES

Steps to be Taken if Material is Released or Spilled

Eliminate sources of ignition. Persons not wearing suitable personal protective equipment should be excluded from area of spill until clean-up has been completed. Shut off source of spill if possible to do so without hazard. Prevent material from entering sewers or watercourses. Provide adequate ventilation. Contain spilled materials with sand or earth. Recover undamaged and minimally contaminated material for reuse or reclamation. Place all collected material and spill absorbents into DOT approved containers.

Advise authorities. If this product is an EPA hazardous substance (see Section 10), notify the U.S.EPA and/or the National Response Center. Additional notification pursuant to SARA Section 302/304 (40 CFR 355) may also be required.

Waste Disposal Method

Treatment, storage, transportation and disposal must be in accordance with EPA or State regulations under authority of

M A T E R I A L S A F E T Y D A T A S H E E T

PAGE 4

Product Name: UNICHEM 7250

Section: 07 SPILL OR LEAK PROCEDURES CONTINUED

the Resource Conservation and Recovery Act (40 CFR 260-271).

Section: 08 SPECIAL PROTECTIVE INFORMATION
-----Respiratory Protection

If workplace exposure limit(s) of product or any component is exceeded, an NIOSH/MSHA approved air supplied respirator is advised in absence of proper environmental control. OSHA regulations also permit other NIOSH/MSHA respirators (negative pressure organic vapor type) under specified conditions. Engineering or administrative controls should be implemented to reduce exposure.

Ventilation

The use of mechanical dilution ventilation is recommended whenever this product is used in confined spaces, is heated above ambient temperatures or is agitated. When applicable, sufficient local ventilation should be provided to maintain employee exposures below safe working limits (TWA's).

Protective Gloves

Neoprene, nitrile, polyvinyl alcohol (PVA), polyvinyl chloride (PVC)

Eye Protection

Chemical splash goggles or face shield in compliance with OSHA regulations is advised; however OSHA regulations also permits safety glasses under certain conditions. The use of contact lenses is not recommended.

Other Protective Equipment

Eye wash and safety shower

Section: 09 SPECIAL PRECAUTIONS
-----Precautions to be Taken in Handling and Storing

Avoid contact with eyes, skin or clothing. Avoid breathing vapors or mist. Keep away from heat, sparks, and open flames and never use a cutting torch on or near container (even empty) or explosion may result. Vapors may travel to areas away from the work site and ignite.

Other Precautions

Containers of this material may be hazardous when emptied. Since emptied containers retain product residues (vapor, liquid, and/or solid), all hazard precautions given in the data sheet must be observed. Do not transfer to improperly marked container. Do not use pressure to empty container. Do not cut, heat, weld, or expose containers to flame or other sources of ignition. Keep container closed. Use with

M A T E R I A L S A F E T Y D A T A S H E E T

PAGE 5

Product Name: UNICHEM 7250

Section: 09 SPECIAL PRECAUTIONS

CONTINUED

adequate ventilation. Wash thoroughly after handling.
Containers should be grounded and bonded to receiving
container(s) when being emptied. Containers should not be
washed out and used for other purposes.
FOR INDUSTRIAL USE ONLY

Section: 10 REGULATORY INFORMATION

Superfund Amendments and Reauthorization Act of 1986(SARA) Title IIISection 302/304-Extremely Hazardous Substances (40 CFR 355)

SARA requires emergency planning based on Threshold Planning
Quantities (TPQs) and release reporting based on Reportable
Quantities (RQs) in 40 CFR 355 (used for SARA 302, 304, 311
and 312). These values are subject to change and the
regulations should be consulted to verify current statutory
requirements.

Components present in this product at a level which
could require reporting under the statute are:

Component NameRQ TPQ % Range

NONE

Section 311/312 Chemical Inventory Reporting Requirements (40 CFR 370)

The Superfund Amendments and Reauthorization Act (SARA) may
require submission of reports (chemical list, MSDS, Tier I &
Tier II) to the State Emergency Response Commission, Local
Emergency Response Committee and the local fire department.
The SARA physical and health hazards related to this product
are:

☒ Acute Health Hazard
☒ Chronic Health Hazard

☐ Sudden Release of Pressure
☐ Reactive

☒ Fire

Section 313-List of Toxic Chemicals (40 CFR 372)

This product contains the following toxic chemicals subject
to the reporting requirements of Section 313 of the
Emergency Planning and Community Right-to-Know Act of 1986
(40 CFR 372). This information should be included in all
MSDSs that are copied and distributed for this material.

Component NameCAS #% Range

ethyl benzene

00100-41-4 < 10%

xylene

01330-20-7 < 5%

naphthalene

00091-20-3 < 5%

cumene

00098-82-8 < 5%

CERCLA, 40 CFR 261 AND 302

The Comprehensive Environmental Response, Compensation, and
Liability Act of 1980 (CERCLA) requires notification of the
National Response Center 1-800-424-8802 of any release of a

M A T E R I A L S A F E T Y D A T A S H E E T

PAGE 6

Product Name: UNICHEM 7250

Section: 10 REGULATORY INFORMATION

CONTINUED

Hazardous Substances equal to or greater than the reportable quantities (RQs) listed in 40CFR 302.4. Values are given in pounds for the component and not the mixture, if applicable. (These values are subject to change and the regulations should be consulted to verify current statutory levels.)

<u>Component Name</u>	<u>CAS #</u>	<u>CERCLA RQ</u>
ethyl benzene	00100-41-4	1000
xylene	01330-20-7	1000
naphthalene	00091-20-3	100
cumene	00098-82-8	5000

OSHA Exposure LimitsComponent Name

isopropyl alcohol

TWA ppm: 400.0 TWA MG/M3: 980.0 STEL ppm: 500.0 STEL MG/M3: 1225.0

ethyl benzene

TWA ppm: 100.0 TWA MG/M3: 435.0 STEL ppm: 125.0 STEL MG/M3: 545.0

xylene

TWA ppm: 100.0 TWA MG/M3: 435.0 STEL ppm: 150.0 STEL MG/M3: 655.0

naphthalene

TWA ppm: 10.0 TWA MG/M3: 50.0 STEL ppm: 15.0 STEL MG/M3: 75.0

cumene

TWA ppm: 50.0 TWA MG/M3: 245.0

Skin: X

National Fire Protection Agency2 Health0 Reactive3 Fire OtherDepartment of Transportation Shipping Information

Proper Shipping Name: Flammable liquids, n.o.s.

Hazard Class: 3

Identification: UN1993

Packaging Group: PG II

Contains: naphthalene, ethyl benzene, xylene

Hazardous Substance RQ: 2000# Emergency Response Guide Number: 128

Labels: Flammable liquid

Toxic Substances Control Act (TSCA), 40 CFR 261

This product, or components if product is a mixture, is/are listed on the Toxic Substance Control Act (TSCA) inventory.

Section 10 information is to remain attached to the material safety data sheet for this product.

While UNICHEM believes that the above data is correct, UNICHEM expressly disclaims liability for any loss or injury arising out of the use of this information or the use of any materials designated.

END OF MSDS

UNICHEM 7250

**PRODUCT
BULLETIN****DESCRIPTION**

UNICHEM 7250 is a blend of sulfonates, oxyalkylated resins, and solvents formulated to effectively resolve water/oil emulsions. This blend of wetting agents and demulsifiers is particularly effective on waste oils stabilized by solids, polymers, and other contaminants associated with refinery processes.

USES

UNICHEM 7250 is used to separate waste oil emulsions such as tank bottoms, API skimmings, DAF skimmings, and other oily wastes characterized by a high BS/W content.

APPLICATION

UNICHEM 7250 should be added in a location where there will be sufficient mixing to distribute the product into the emulsion. It will be most effective at concentrations of 500-2000 ppm. It is recommended that the treated oil be heated and allowed to settle for 24-48 hours.

PROPERTIES

Appearance.....	Brown Clear Liquid
Density.....	7.64 lbs/gal
Solubility.....	Hydrocarbon
Pour Point.....	-40 ^o F
Flash Point (TCC).....	66 ^o F

HANDLING

Do not expose this product to open flame or extreme heat. Avoid contact with skin, eyes, or clothing. In case of eye contact, flush with water for at least fifteen minutes. Seek medical help if irritation persists. For skin contact, flush with water and wash thoroughly with soap and water. Remove contaminated clothing and wash before reuse. Avoid breathing fumes or vapors.

Refer to the material safety data sheet for more information regarding the safe use and handling of this product.

PACKAGING

UNICHEM 7250 is available in 55 gallon drums or in bulk quantities.



TNRCC

Protecting Texas
by Reducing and
Preventing Pollution

FAX TRANSMITTAL

DATE: 12-11-97 NUMBER OF PAGES (including this cover sheet): 2

TO: Name Pam Morse
Organization Unichem
FAX Number 505-393-1150

FROM: TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
Name Francine Dixon
Division/Region Industrial & Hazardous Waste/Waste Evaluation
Telephone Number 512-239-6832 (option -3)
FAX Number 512-239-0786

NOTES:

Pam,

you are correct, no waste code number is required for this non industrial generator generating this non haz contaminated soil.

I said a waste code number was needed because during the conversation you did not indicate that the registered generator (who became CESQG) was non industrial.

*Thanks,
Francine*

District I - (505) 393-6161
P.O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 8/8/95

Submit Original
Plus 1 Copy
to appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Transwestern Pipeline Co.
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Station #8 Corona N.M.
2. Management Facility Destination Gandy Marley Inc.	6. Transporter Gandy Corp
3. Address of Facility Operator Box 1658 Roswell N.M. 88202	8. State New Mexico
7. Location of Material (Street Address or ULSTR) S. of Corona	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

CONTAMINATED SOIL FROM DRAIN LINE

ALL: TIM GUMM, PLEASE CHECK OUT & FORWARD
TO MARTHA IN S.F.
THANKS LARRY



NOV 12 1997

RECEIVED

Estimated Volume 200 cy Known Volume (to be entered by the operator at the end of the haul) cy

SIGNATURE: Larry Gandy TITLE: v p DATE: 11-7-97
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Larry Gandy TELEPHONE NO. 398-4960

(This space for State Use)

APPROVED BY: [Signature] TITLE: Env Eng DATE: 11/14/97

APPROVED BY: [Signature] TITLE: Env Geologist DATE: 11/20/97

6/10/02/11 59494 of sent

GANDY MARLEY, INC.
P. O. BOX 827
TATUM, NEW MEXICO 88267
TATUM, NEW MEXICO ROSWELL, NEW MEXICO

CERTIFICATE OF WASTE STATUS
OILFIELD NON-EXEMPT WASTE MATERIAL

Originating Location: TRANSWESTERN PIPELINE CO.

STATION # 8 S. OF CORONA N.M.

Source: CONTAMINATED SOIL FROM DRAIN LINE LEAK

Disposal Location: 34 mi. East of Tatum

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for TRANSWESTERN PIPELINE
concur with the status of the waste from the subject site.

Name BUTCH RUSSEL

Title/Agency SUPERVISOR/ TWPL

Butch Russell

Address Summit Office Bldg. Ste. 250

4001 Indian School Rd. NE

Albuquerque, N.M. 87110

Signature _____

Date 11-7-97

ANALYTICAL RESULTS REPORT

Larry Campbell
 TRANSWESTERN PIPELINE
 5381 N. Main St.
 Roswell, NM 88202

10/03/1997

EPIC Job Number: 97.03859
 Sample Number: 339374

Page 5

Project Description:
 Job Description: STA #8
 Sample Description: 922-1

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
2-Chloroethylvinyl ether	EDL	<100	ug/kg	S-8240A		09/30/1997	zst		510	100
Chloroform	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
Chloroethane	EDL	<50	ug/kg	S-8240A		09/30/1997	zst		510	50
Dibromochloromethane	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
1,1-Dichloroethane	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
1,2-Dichloroethane	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
1,1-Dichloroethene	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
trans-1,2-Dichloroethene	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
1,2-Dichloropropane	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
trans-1,3-Dichloropropene	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
Ethyl benzene	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
n-Hexane	EDL	<200	ug/kg	S-8240A		09/30/1997	zst		510	200
Acetylene chloride	B	25.1	ug/kg	S-8240A		09/30/1997	zst		510	20
1-Methyl-2-pentanone (MIBK)	EDL	<200	ug/kg	S-8240A		09/30/1997	zst		510	200
Styrene	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
1,1,2,2-Tetrachloroethane	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
Tetrachloroethene	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
Toluene	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
1,1,1-Trichloroethane	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
1,1,2-Trichloroethane	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
Trichloroethene	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
Amyl acetate	EDL	<200	ug/kg	S-8240A		09/30/1997	zst		510	200
Amyl chloride	EDL	<50	ug/kg	S-8240A		09/30/1997	zst		510	50
Xylenes, Total		37.6	ug/kg	S-8240A		09/30/1997	zst		510	20
URR: 1,2-Dichloroethane-d4		106	% Rec	S-8240A		09/30/1997	zst		510	70-121
URR: Toluene-d8		103	% Rec	S-8240A		09/30/1997	zst		510	81-117
URR: 4-Bromofluorobenzene		110	% Rec	S-8240A		09/30/1997	zst		510	74-121

- Blank contamination.

U - Elevated Detection Limit due to matrix interference.

ANALYTICAL RESULTS REPORT

Larry Campbell
TRANSWESTERN PIPELINE
6381 N. Main St.
Roswell, NM 88202

10/03/1997

EPIC Job Number: 97.03859
Sample Number: 339374

Page 4

Project Description:
Job Description: STA #8
Sample Description: 922-1

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
Fluorane		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
hexachlorobenzene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
hexachlorobutadiene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
hexachlorocyclopentadiene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
hexachloroethane		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
indene (1,2,3-cd)pyrene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
sophorane		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
Methylnaphthalene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
aphthalene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
-Nitroaniline		<1300	ug/kg	S-8270A		10/01/1997	dtw	575	358	1300
-Nitroaniline		<1300	ug/kg	S-8270A		10/01/1997	dtw	575	358	1300
-Nitroaniline		<1300	ug/kg	S-8270A		10/01/1997	dtw	575	358	1300
nitrobenzene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
-Nitrosodimethylamine		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
-Nitroso-di-n-propylamine		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
-Nitrosodiphenylamine		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
teranthrene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
Terp		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
2,4-Trichlorobenzene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
MR: 2-Fluorobiphenyl		48	% Rec	S-8270A		10/01/1997	dtw	575	358	10-115
MR: Nitrobenzene-d5		36	% Rec	S-8270A		10/01/1997	dtw	575	358	21-120
MR: Terphenyl-d14		66	% Rec	S-8270A		10/01/1997	dtw	575	358	14-137
in 8240 MOWAG.										
etene	EDL	<500	ug/kg	S-8240A		09/30/1997	zst		510	500
ene	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
omochloromethane	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
omofom	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
omomethane	EDL	<50	ug/kg	S-8240A		09/30/1997	zst		510	50
Sucanone (MEX)	EDL	<500	ug/kg	S-8240A		09/30/1997	zst		510	500
rbon disulfide	EDL	<500	ug/kg	S-8240A		09/30/1997	zst		510	500
rbon tetrachloride	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
lorobenzene	EDL	<20	ug/kg	S-8240A		09/30/1997	zst		510	20
loranthene	EDL	<50	ug/kg	S-8240A		09/30/1997	zst		510	50

EDL - Elevated Detection Limit due to matrix interference.

ANALYTICAL RESULTS REPORT

Larry Campbell
 TRANSWESTERN PIPELINE
 6381 N. Main St.
 Roswell, NM 88202

10/03/1997

EPIC Job Number: 97.03859
 Sample Number: 339374

Page 3

Project Description:
 Job Description: STA #8
 Sample Description: 922-1

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyte	Prep Batch Number	Run Batch Number	Reporting Limit
AER/NEUTRALE - 8270					09/30/1997					
acenaphthene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
acenaphthylene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
aciline		<1300	ug/kg	S-8270A		10/01/1997	dtw	575	358	1300
anthracene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
azidine		<1300	ug/kg	S-8270A		10/01/1997	dtw	575	358	1300
azo(a)anthracene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
azo(b)fluoranthene		<660	ug/kg	S-8270A		10/02/1997	dtw	575	358	660
azo(k)fluoranthene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
azo(g,h,i)perylene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
azo(l)pyrene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
ethyl benzyl phthalate		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
s(2-chloroethoxy)methane		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
s(2-chloroethyl)ether		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
s(2-chloroisopropyl)ether		<660	ug/kg	S-8270A		10/02/1997	dtw	575	358	660
s(2-ethylhexyl)phthalate		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
protophenyl phenyl ether		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
chloroaniline		<1300	ug/kg	S-8270A		10/01/1997	dtw	575	358	1300
chloronaphthalene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
chlorophenyl phenyl ether		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
rysene		<660	ug/kg	S-8270A		10/02/1997	dtw	575	358	660
rene(a,h)anthracene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
benzofuran		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
n-butyl phthalate		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
1-Dichlorobenzene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
1-Dichlorobenzene		<660	ug/kg	S-8270A		10/02/1997	dtw	575	358	660
1-Dichlorobenzene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
1-Dichlorobenzidine		<1300	ug/kg	S-8270A		10/01/1997	dtw	575	358	1300
ethyl phthalate		<660	ug/kg	S-8270A		10/02/1997	dtw	575	358	660
ethyl phthalate		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
-Dinitrotoluene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
-Dinitrotoluene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
n-octyl phthalate		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660
oxanthene		<660	ug/kg	S-8270A		10/01/1997	dtw	575	358	660

ANALYTICAL RESULTS REPORT

Larry Campbell
 TRANSWESTERN PIPELINE
 6381 N. Main St.
 Roswell, NM 88202

10/03/1997

EPIC Job Number: 97.03859
 Sample Number: 339374

Page 2

Project Description:
 Job Description: STA #8

Sample Description: 922-1

Parameter	Flag	Method	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	KUB Batch Number	Reporting Unit
TPH-418.1 (Nonaqueous)		63300	ug/g	E-418.1		09/30/1997	hss		1351	10
Arsenic, ICF		18	ug/g	S-601DA	09/25/1997	09/29/1997	acy	1236	1471	3.0
PCB/PBST-NONAQUE. (8080)					09/30/1997					
PCB-1016	EDL	<220	ug/kg	S-8080A		10/01/1997	ccc	296	596	2.2
PCB-1221	EDL	<220	ug/kg	S-8080A		10/01/1997	ccc	296	596	2.2
PCB-1232	EPL	<220	ug/kg	S-8080A		10/01/1997	ccc	296	596	2.2
PCB-1242	EDL	<220	ug/kg	S-8080A		10/01/1997	ccc	296	596	2.2
PCB-1248	EDL	<220	ug/kg	S-8080A		10/01/1997	ccc	296	596	2.2
PCB-1260	EDL	<220	ug/kg	S-8080A		10/01/1997	ccc	296	596	2.2
URR: DCB	D	NA	g Rec	S-8080A		10/01/1997	ccc	296	596	50-120
URR: TCX	D	NA	g Rec	S-8080A		10/01/1997	ccc	296	596	40-125
CID EXTRACTABLES - 8270					09/30/1997					
benzoic acid		<3300	ug/kg	S-8270A		10/01/1997	dcw	575	358	3300
benzyl alcohol		<3300	ug/kg	S-8270A		10/01/1997	dcw	575	358	3300
-Chloro-3-methylphenol		<660	ug/kg	S-8270A		10/01/1997	dcw	575	358	3300
-Chlorophenol		<660	ug/kg	S-8270A		10/01/1997	dcw	575	358	660
4-Dichlorophenol		<660	ug/kg	S-8270A		10/01/1997	dcw	575	358	660
4-Dinitrophenol		<3300	ug/kg	S-8270A		10/01/1997	dcw	575	358	3300
4-Ethylphenol (o-Cresol)		<660	ug/kg	S-8270A		10/01/1997	dcw	575	358	660
4-Methylphenol (p-Cresol)		<660	ug/kg	S-8270A		10/01/1997	dcw	575	358	660
-Nitrophenol		<660	ug/kg	S-8270A		10/01/1997	dcw	575	358	660
-Nitrophenol		<3300	ug/kg	S-8270A		10/01/1997	dcw	575	358	3300
2,4-Dichlorophenol		<3300	ug/kg	S-8270A		10/01/1997	dcw	575	358	3300
2,4,6-Trichlorophenol		<660	ug/kg	S-8270A		10/01/1997	dcw	575	358	660
4,6-Trichlorophenol		<660	ug/kg	S-8270A		10/01/1997	dcw	575	358	660
URR: 2-Fluorophenol		31	g Rec	S-8270A		10/01/1997	dcw	575	358	25-121
URR: Phenol-d6		30	g Rec	S-8270A		10/01/1997	dcw	575	358	24-113
URR: 2,4,6-Trichlorophenol		28	g Rec	S-8270A		10/01/1997	dcw	575	358	12-122

- Surrogate diluted out.

L - Elevated Detection Limit due to matrix interference.

ANALYTICAL RESULTS REPORT

Larry Campbell
TRANSWESTERN PIPELINE
6381 N. Main St.
Roswell, NM 88202

10/11/1997

EPIC Job Number: 97.03975
Sample Number: 339816

Page 2

Project Description:
Job Description: Station #8

Sample Description: 922-1

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
TCLP NON-VOLATILE EXTRACTION		c		S-1311		10/06/1997	rmw		580	
TCLP-Arsenic, ICP		<0.03	mg/L	S-6010A	10/07/1997	10/09/1997	apa	1163	1780	0.03

QUALITY CONTROL REPORT BLANKS

Larry Campbell
TRANSWESTERN PIPELINE
6381 N. Main St.
Roswell, NM 88202

10/03/1997

EPIC Job Number: 97.03859

Project Description:
Job Description: STA #8

Parameter	Flag	Blank Result	Units	Reporting Limit	Date Analyzed	Prep Batch Number	Run Batch Number
Toluene		<5	ug/kg	5	09/30/1997		510
1,1,1-Trichloroethane		<5	ug/kg	5	09/30/1997		510
1,1,2-Trichloroethane		<5	ug/kg	5	09/30/1997		510
Trichloroethane		<5	ug/kg	5	09/30/1997		510
Vinyl acetate		<50	ug/kg	50	09/30/1997		510
Vinyl chloride		<10	ug/kg	10	09/30/1997		510
Xylenes, Total		<5	ug/kg	5	09/30/1997		510

All parameters should be less than the reporting limit.



LABORATORIES, INC.

ANALYTICAL AND QUALITY CONTROL REPORT

Larry Campbell
TRANSWESTERN PIPELINE
6381 N. Main St.
Roswell, NM 88202

10/11/1997

EPIC Job Number: 97.03975

Page 1

Project Description:
Job Description: Station #8

Enclosed are the Analytical Results and Quality Control Data Reports for the following samples submitted to EPIC Laboratories, Inc. for analysis:

Sample Number	Sample Description	Date Taken	Time Taken	Date Received
339816	922-1	09/22/1997	10:00	09/23/1997

This 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.


Debby Skogen
Project Coordinator

NOTE: Results apply only to the samples analyzed. Reproduction of this report is permitted only in its entirety.

1555 Valwood Parkway, Suite 100, Carrollton, Texas 75006
2621 Ridgepoint Drive, Suite 135, Austin, Texas 78754
13802 Placid Brook Court, Houston, Texas 77059

(972) 406-8100
(512) 928-8905
(281) 286-1400

Fax: (972) 484-2863
Fax: (512) 928-3208
Fax: (281) 286-2424

EPIC

LABORATORIES, INC.

1855 Midland Pkwy., Ste. 100
Carmichael, Texas 75008

Dallas (972) 454-4100
Austin (512) 829-8000
Houston (281) 255-1400

CHAIN OF CUSTODY RECORD

COMPANY Transwestern Pipeline

ADDRESS 6191 N. 44th Avenue

PHONE 505 825 8023 FAX 505 825 8023

PROJECT NAME/LOCATION 974 & 8

PROJECT NUMBER GEORGE FRIEND

PROJECT MANAGER George Friend

REPORT TO Labdy Chan

INVOICE NO. ONE

P.O. NO.

EPIC QUOTE NO.

IN 15% salt being analyzed for regulatory compliance?

IN 15% salt being analyzed for regulatory compliance?

IN 15% salt being analyzed for regulatory compliance?

IN 15% salt being analyzed for regulatory compliance?

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IN 15% salt being analyzed for regulatory compliance?

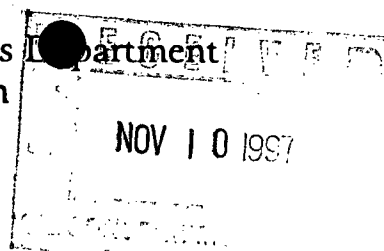
IN 15% salt being analyzed for regulatory compliance?

IN 15% salt being analyzed for regulatory compliance?

IN 15% salt being analyzed for regulatory compliance?

District I - (505) 393-6161
P.O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131



Form C-138
Originated 8/8/95

Submit Original
Plus 1 Copy
to appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator El Paso Natural Gas Company
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Roswell Station
2. Management Facility Destination Gandy Marley, Inc.	6. Transporter Gandy Corp.
3. Address of Facility Operator P.O. Box 1658, Roswell	8. State NM
7. Location of Material (Street Address or ULSTR) 20 miles North on Hiway 285	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.	
All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Contaminated soils from Ambitrol storage tank line leak

AEL: MAR 4th 97 - CHECK-OUT VALVE ON
Also call 1254? CALL ME!
PCB According to CFR 761 Clean Fill Has <1 ppm PCB
Soil
See CFR 761.125.b.1.ii And CFR 761.125.C.4.V
See CFR 761.125.b.1.ii
MJK

Estimated Volume 200 cy Known Volume (to be entered by the operator at the end of the haul) cy

SIGNATURE: Larry Gandy TITLE: Vice-Pres. DATE: 10-24-97
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Larry Gandy TELEPHONE NO. 505-398-4960

(This space for State Use)		
APPROVED BY: <u>[Signature]</u>	TITLE: <u>ENR Engr</u>	DATE: <u>10/31/97</u>
APPROVED BY: <u>[Signature]</u>	TITLE: <u>Env Geologist</u>	DATE: <u>11/14/97</u>



TO: SAC, NEW YORK
FROM: SAC, NEW YORK
SUBJECT: [Illegible]

GANDY MARLEY, INC.
P. O. BOX 827
TATUM, NEW MEXICO 88267
TATUM, NEW MEXICO ROSWELL, NEW MEXICO

CERTIFICATE OF WASTE STATUS
OILFIELD NON-EXEMPT WASTE MATERIAL

Originating Location: El Paso Natural Gas
Roswell Stat. 20 mi. N. Roswell on Hiway 285

Source: Contaminated soil from Ambitrol storage leak

Disposal Location: 43 mi E. of Roswell on Hiway 380

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for El Paso Natural Gas
concur with the status of the waste from the subject site.

Name Charles T. Lueras

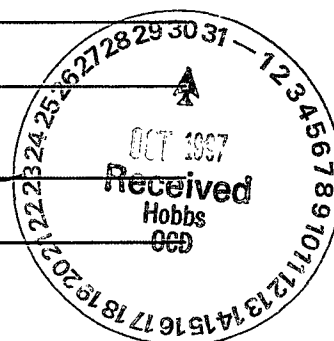
Title/Agency Area Supervisor

Address #6 Petro Drive

Roswell N.M. 88201

Signature Charles T. Lueras

Date 10-24-97





Material Safety Data Sheet

The Dow Chemical Company
Midland, Michigan 48674

1. CHEMICAL PRODUCT & COMPANY IDENTIFICATION

Page: 1

24-Hour Emergency Phone Number: 517-636-4400

Product: AMBITROL (R) FL 50 COOLANT

Product Code: 07666

Effective Date: 08/10/95

Date Printed: 08/22/95

MSD: 003874

The Dow Chemical Company, Midland, MI 48674

Customer Information Center: 800-258-2436

2. COMPOSITION/INFORMATION ON INGREDIENTS

Ethylene glycol
Dipotassium phosphate
Water

CAS# 000107-21-1 50-53%
CAS# 007758-11-4 <3%
CAS# 007732-18-5 <50%

3. HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

* Colored liquid. Glycol odor. No significant immediate hazards for *
* emergency response are known. *
* *

POTENTIAL HEALTH EFFECTS (See Section 11 for toxicological data.)

EYE: May cause slight transient (temporary) eye irritation.
Corneal injury is unlikely. Vapors or mists may cause eye
irritation.

SKIN: Prolonged or repeated exposure may cause slight skin
irritation. May cause more severe response if skin is abraded
(scratched or cut). A single prolonged exposure is not likely
to result in the material being absorbed through skin in harmful
amounts. Repeated skin exposure to large quantities may result
in absorption of harmful amounts.

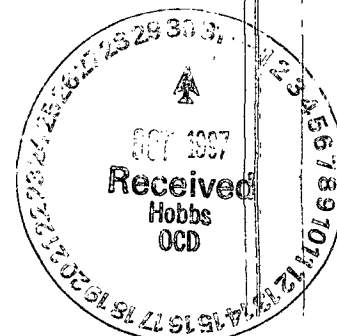
INGESTION: Single dose oral toxicity is believed to be moderate.
Excessive exposure may cause central nervous system effects,
cardiopulmonary effects (metabolic acidosis) and kidney failure.
Small amounts swallowed incidental to normal handling operations

(Continued on page 2 , over)

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Printed on Recycled and Recyclable Paper



MATERIAL SAFETY DATA SHEET

PAGE: 2

Product: AMBITROL (R) FL 50 COOLANT
Product Code: 07666

Effective Date: 08/10/95

Date Printed: 08/22/95

MSD: 003874

are not likely to cause injury; however, swallowing amounts larger than that may cause serious injury, even death. Single dose oral toxicity is expected to be moderate to humans even though tests with animals show a lower degree of toxicity. The lethal dose in humans is estimated to be 100 ml (3 ounces) for ethylene glycol.

INHALATION: At room temperature, vapors are minimal due to low vapor pressure. If material is heated or mist is produced, concentrations may be attained that are sufficient to cause irritation and other effects.

CHRONIC EFFECTS:

SYSTEMIC (OTHER TARGET ORGAN) EFFECTS: Excessive exposure may cause irritation to upper respiratory tract. Observations in animals include kidney and liver effects and deposition of calcium salts in various tissues after long-term dietary intake of ethylene glycol.

CANCER INFORMATION: Ethylene glycol did not cause cancer in long-term animal studies.

TERATOLOGY (BIRTH DEFECTS): Based on animal studies, ingestion of very large amounts of ethylene glycol appears to be the major and possibly only route of exposure to produce birth defects. Exposures by inhalation (tested nose-only in animals to prevent ingestion) or skin contact, the primary routes of occupational exposure, had minimal or essentially no effect on the fetus.

REPRODUCTIVE EFFECTS: Ingestion of large amounts of ethylene glycol has been shown to interfere with reproduction in animals. Specifically, growth retardation and decreased litter size in rats and mice and mating frequency in mice were observed.

4. FIRST AID

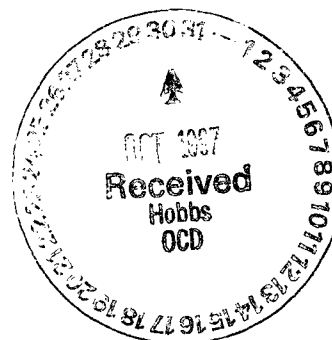
EYES: Flush eyes with plenty of water.

SKIN: Wash off in flowing water or shower.

INGESTION: If swallowed, induce vomiting immediately as directed by medical personnel. Never give anything by mouth to an unconscious person. Consult medical personnel. Seek medical attention immediately.

(Continued on page 3)

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M A T E R I A L S A F E T Y D A T A S H E E T

PAGE: 3

Product: AMBITROL (R) FL 50 COOLANT
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Date Printed: 08/22/95

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INHALATION: Remove to fresh air if effects occur. Consult a physician.

NOTE TO PHYSICIAN: Early administration of ethanol may counter the toxic effects of ethylene glycol -- metabolic acidosis and renal damage. Hemodialysis or peritoneal dialysis have been of benefit. New Eng. J. Med. 304:21 1981.
No specific antidote. Supportive care. Treatment based on judgment of the physician in response to reactions of the patient.

5. FIRE FIGHTING MEASURES

FLAMMABLE PROPERTIES

FLASH POINT: None to 220F (104C)

METHOD USED: TCC

AUTOIGNITION TEMPERATURE: 748F, 398C (In air)

FLAMMABILITY LIMITS

LFL: 3.2 vol. percent in air (ethylene glycol)

UFL: Not determined

HAZARDOUS COMBUSTION PRODUCTS: Combustion may produce carbon, carbon monoxide, carbon dioxide and water. Unidentified organic compounds may be formed during combustion.

OTHER FLAMMABILITY INFORMATION: Dense smoke emitted when burned without sufficient oxygen.

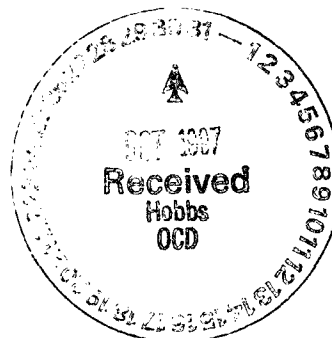
EXTINGUISHING MEDIA: Water fog, carbon dioxide, dry chemical, foam. For large-scale fires, alcohol resistant foams are preferred if available. General purpose synthetic foams or protein foams may function, but much less effectively. Water may be used to flush spills away from fire exposures and to dilute spills to non-flammable mixtures. If possible, contain fire run-off water. For large scale fires, direct water stream may cause violent frothing, but fine water spray may help control situation.

FIRE FIGHTING INSTRUCTIONS: Keep unnecessary people away; isolate hazard area and deny unnecessary entry. When using water spray, boil over may occur when the product temperature reaches the boiling point of water (tank type scenarios, not spills).

This material will not burn until the water content is reduced

(Continued on page 4 , over)

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MATERIAL SAFETY DATA SHEET**PAGE: 4****Product: AMBITROL (R) FL 50 COOLANT**
Product Code: 07666**Effective Date: 08/10/95****Date Printed: 08/22/95****MSD: 003874**

below 25% w/w. At this point, the material will exhibit the flammability characteristics of ethylene glycol (i.e. flash point = 232F (111C), LFL = 3.2 Vol %).

PROTECTIVE EQUIPMENT FOR FIRE FIGHTERS: Wear positive-pressure self-contained breathing apparatus and full protective equipment.

6. ACCIDENTAL RELEASE MEASURES (See Section 15 for Regulatory Information)

PROTECT PEOPLE: Isolate and confine spill area. Spills may be a slipping hazard. If temperature is above flash point, cover with vapor suppression foam until it can be cleaned up.

PROTECT THE ENVIRONMENT: Keep out of sewers, storm drains, surface waters and soil. Material is more dense than water and has infinite water solubility.

CLEANUP: Small spills: Soak up with absorbent material and scoop into containers. Large spills: Prevent contamination of waterways. Dike and pump into suitable containers. Clean up residual with absorbent material and wash with water.

7. HANDLING AND STORAGE

HANDLING: Avoid body contact. Provide adequate ventilation. Above flash point vapor-air mixtures will burn within flammable limits.

Spills of these organic liquids on hot fibrous insulations may lead to lowering of the autoignition temperature possibly resulting in spontaneous combustion.

STORAGE: Store in sealed containers.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

ENGINEERING CONTROLS: Provide general and/or local exhaust ventilation to control airborne levels below the exposure guidelines. Local exhaust ventilation may be necessary for some operations.

PERSONAL PROTECTIVE EQUIPMENT

(Continued on page 5)

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MATERIAL SAFETY DATA SHEET**PAGE: 5****Product: AMBITROL (R) FL 50 COOLANT**
Product Code: 07666**Effective Date: 08/10/95****Date Printed: 08/22/95****MSD: 003874**

EYE/FACE PROTECTION: Use safety glasses. If vapor exposure causes eye discomfort, use a full-face respirator.

SKIN PROTECTION: When prolonged or frequently repeated contact could occur, use protective clothing impervious to this material. Selection of specific items such as faceshield, gloves, boots, apron, or full-body suit will depend on operation. If hands are cut or scratched, use gloves impervious to this material even for brief exposures.

RESPIRATORY PROTECTION: Atmospheric levels should be maintained below the exposure guideline. For most conditions, no respiratory protection should be needed; however, if material is heated or sprayed, use an approved air-purifying respirator.

EXPOSURE GUIDELINES(S):

Ethylene glycol: ACGIH TLV is 100 mg/m³, (39.4 ppm), aerosol, Ceiling, A4. OSHA PEL is 50 ppm Ceiling.

PELs are in accord with those recommended by OSHA, as in the 1989 revision of PELs.

9. PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE/PHYSICAL STATE: Colored liquid

ODOR: Glycol like.

VAP. PRESS: 16 mmHg @ 20C, 68F

VAP. DENSITY: >1.0

BOILING POINT: 226F, 108C

SOL. IN WATER: Infinite

SP. GRAVITY: 1.08 @ 60/60F, 16C

10. STABILITY AND REACTIVITY

CHEMICAL STABILITY: Excellent thermal stability characteristics at typical use temperatures.

CONDITIONS TO AVOID: None known

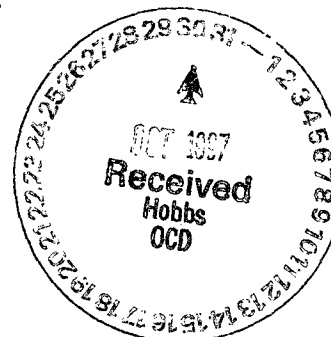
INCOMPATIBILITY WITH OTHER MATERIALS: Oxidizing materials.

HAZARDOUS POLYMERIZATION: Will not occur.

11. TOXICOLOGICAL INFORMATION (See Section 3 for Potential Health Effects. For detailed toxicological data, write or call the address or non-emergency number shown in Section 1)

(Continued on page 6, over)

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MATERIAL SAFETY DATA SHEET

PAGE: 6

Product: AMBITROL (R) FL 50 COOLANT
Product Code: 07666

Effective Date: 08/10/95 Date Printed: 08/22/95 MSD: 003874

ACUTE

INGESTION: The oral LD50 for rats is >8200 mg/kg for a similar material.

SKIN: The LD50 for skin absorption in rabbits is >2000 mg/kg for a similar mixture.

MUTAGENICITY (EFFECTS ON GENETIC MATERIAL): In vitro mutagenicity studies were negative for ethylene glycol. Animal mutagenicity studies were negative for ethylene glycol.

12. ECOLOGICAL INFORMATION (For detailed Ecological data, write or call the address or non-emergency number shown in Section 1)

ENVIRONMENTAL DATA:

MOVEMENT & PARTITIONING: Based largely or completely on data for major component. Bioconcentration potential is low (BCF less than 100 or Log Kow less than 3). No relevant information found for remaining components.

DEGRADATION & TRANSFORMATION: Based largely or completely on data for major component. Biodegradation under aerobic static laboratory conditions is high (BOD20 or BOD28/ThOD greater than 40%). No relevant information found for remaining components.

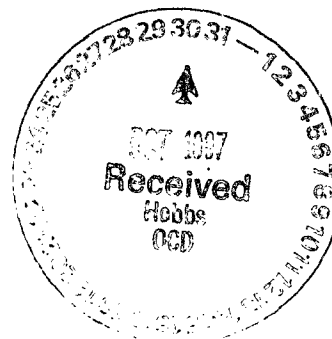
ECOTOXICOLOGY: Based largely or completely on data for major component. Material is practically non-toxic to aquatic organisms on an acute basis (LC50 greater than 100 mg/L in most sensitive species). No relevant information found for remaining components.

13. DISPOSAL CONSIDERATIONS (See Section 15 for Regulatory Information)

DISPOSAL: Any disposal practice must be in compliance with all federal, state/provincial, and local laws and regulations. State/provincial and local requirements for waste disposal may be more restrictive or otherwise different from federal laws and regulations. Regulations may also vary in different locations. Chemical additions, processing, storage, or otherwise altering this material may make the waste management information presented in this MSDS incomplete, inaccurate or otherwise inappropriate. Waste characterization and disposal compliance are the responsibility solely of the party generating

(Continued on page 7)

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M A T E R I A L S A F E T Y D A T A S H E E T

PAGE: 7

Product: AMBITROL (R) FL 50 COOLANT
Product Code: 07666

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the waste or deciding to discard or dispose of the material. None of these waste management options should be considered "arranging for disposal".

As a service to its customers, Dow can provide lists of companies which recycle, reprocess or manage chemicals and companies that recondition used drums. Telephone Dow's Customer Information Center at 800/258-2436 for further details.

14. TRANSPORT INFORMATION

DEPARTMENT OF TRANSPORTATION (D.O.T.):

This product is not regulated by D.O.T. when shipped domestically by land.

CANADIAN TDG INFORMATION:

For TDG regulatory information, if required, consult transportation regulations, product shipping papers, or your Dow representative.

15. REGULATORY INFORMATION (Not meant to be all-inclusive--selected regulations represented)

NOTICE: The information herein is presented in good faith and believed to be accurate, as of the effective date shown above. However, no warranty, express or implied is given. Regulatory requirements are subject to change and may differ from one location to another; it is the buyer's responsibility to ensure that its activities comply with federal, state or provincial, and local laws. The following specific information is made for the purpose of complying with numerous federal, state or provincial, and local laws and regulations. See other sections for health and safety information.

U.S. REGULATIONS

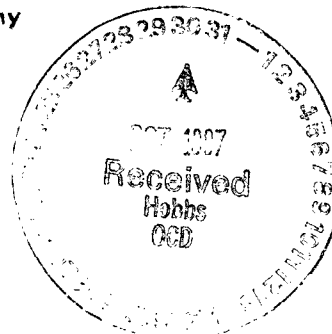
SARA 313 INFORMATION: This product contains the following substances subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372:

CHEMICAL NAME	CAS NUMBER	CONCENTRATION
ETHYLENE GLYCOL	000107-21-1	50 -53 %

SARA HAZARD CATEGORY: This product has been reviewed according to the

(Continued on page 8 , over)

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M A T E R I A L S A F E T Y D A T A S H E E T

PAGE: 8

Product: AMBITROL (R) FL 50 COOLANT

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REGULATORY INFORMATION (CONTINUED)

EPA "Hazard Categories" promulgated under Sections 311 and 312 of the Superfund Amendment and Reauthorization Act of 1986 (SARA Title III) and is considered, under applicable definitions, to meet the following categories:

An immediate health hazard
A delayed health hazard

TOXIC SUBSTANCES CONTROL ACT (TSCA):

All ingredients are on the TSCA inventory or are not required to be listed on the TSCA inventory.

The CAS number(s) for TSCA is(are):

CAS # 000107-21-1

CAS # 007758-11-4

CAS # 007732-18-5

STATE RIGHT-TO-KNOW: The following product components are cited on certain state lists as mentioned. Non-listed components may be shown in the composition section of the MSDS.

CHEMICAL NAME

CAS NUMBER

LIST

ETHYLENE GLYCOL

000107-21-1

NJ3 PA1 PA3

NJ3=New Jersey Workplace Hazardous Substance (present at greater than or equal to 1.0%).

PA1=Pennsylvania Hazardous Substance (present at greater than or equal to 1.0%).

PA3=Pennsylvania Environmental Hazardous Substance (present at greater than or equal to 1.0%).

OSHA HAZARD COMMUNICATION STANDARD:

This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

COMPREHENSIVE ENVIRONMENTAL RESPONSE COMPENSATION AND LIABILITY ACT

(Continued on page 9)

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M A T E R I A L S A F E T Y D A T A S H E E T

PAGE: 9

Product: AMBITROL (R) FL 50 COOLANT
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REGULATORY INFORMATION (CONTINUED)

(CERCLA, or SUPERFUND):

This product contains the following substance(s) listed as "Hazardous Substances" under CERCLA which may require reporting of releases:

Category:

Chemical Name	CAS#	RQ	% in Product
Ethylene glycol	000107-21-1	1 LB	50-53%

CANADIAN REGULATIONS

WHMIS INFORMATION: The Canadian Workplace Hazardous Materials Information System (WHMIS) Classification for this product is:

D2A - material is teratogenic, embryotoxic, or fetotoxic
Refer elsewhere in the MSDS for specific warnings and safe handling information. Refer to the employer's workplace education program.

CPR STATEMENT: This product has been classified in accordance with the hazard criteria of the Canadian Controlled Products Regulations (CPR) and the MSDS contains all the information required by the CPR.

HAZARDOUS PRODUCTS ACT INFORMATION: This product contains the following ingredients which are Controlled Products and/or on the Ingredient Disclosure List (Canadian HPA section 13 and 14):

COMPONENTS:

Ethylene glycol

CAS #
CAS# 000107-21-1AMOUNT (%w/w)
50-53%

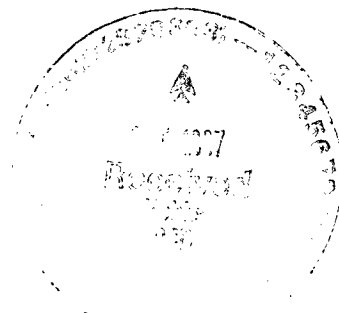
16. OTHER INFORMATION

NATIONAL FIRE PROTECTION ASSOCIATION (NFPA) RATINGS:

Health	1
Flammability	0
Reactivity	0

MSDS STATUS: Revised section 8, TLV change.

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The information herein is given in good faith, but no warranty, express or implied, is made. Consult The Dow Chemical Company for further information.



EMERGENCY RESPONSE

FIRE

- Small Fires
- Dry chemical, CO₂, water spray or regular foam.

Large Fires

- Water spray, fog or regular foam.
- Move containers from fire area if you can do it without risk.
- Do not scatter spilled material with high pressure water streams.
- Dike fire-control water for later disposal.

Fire Involving Tanks

- Cool containers with flooding quantities of water until well after fire is out.
- Withdraw immediately in case of rising sound from venting safety devices or discoloration of tank.
- ALWAYS stay away from the ends of tanks.

SPLIT OR LEAK

- Do not touch or walk through spilled material.
- Stop leak if you can do it without risk.
- Prevent dust cloud.
- Avoid inhalation of asbestos dust.

Small Dry Spills

- With clean shovel place material into clean, dry container and cover loosely; move containers from spill area.

Small Spills

- Take up with sand or other noncombustible absorbent material and place into containers for later disposal.

Large Spills

- Dike far ahead of liquid spill for water disposal.
- Cover powder spill with plastic sheet or tarp to minimize spreading.
- Prevent entry into waterways, sewers, basements or confined areas.

FIREFIGHT

- Move victim to fresh air.
- Call emergency medical care.
- Apply artificial respiration if victim is not breathing.
- Administer oxygen if breathing is difficult.
- Remove and isolate contaminated clothing and shoes.
- In case of contact with substance, immediately flush skin or eyes with running water for at least 20 minutes.
- Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves.

POTENTIAL HAZARDS

FIRE OR EXPLOSION

- Some may burn but none ignite readily.
- Some may polymerize (P) explosively when heated or involved in a fire.
- Containers may explode when heated.
- Some may be transported hot.

HEALTH

- Inhalation of material may be harmful.
- Contact may cause burns to skin and eyes.
- Inhalation of asbestos dust may have a damaging effect on the lungs.
- Fire may produce irritating, corrosive and/or toxic gases.
- Runoff from fire control may cause pollution.

PUBLIC SAFETY

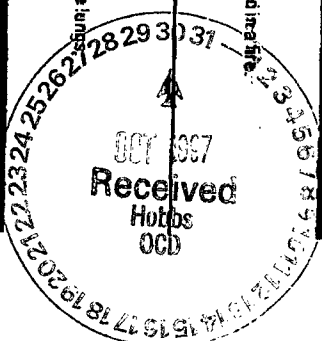
- CALL Emergency Response Telephone Number on Shipping Paper first. If Shipping Paper not available or no answer, refer to appropriate telephone number listed on the inside back cover.
- Isolate spill or leak area immediately for at least 10 to 25 meters (30 to 80 feet) in all directions.
- Keep unauthorized personnel away.
- Stay upwind.

PROTECTIVE CLOTHING

- Wear positive pressure self-contained breathing apparatus (SCBA).
- Structural firefighters' protective clothing will only provide limited protection.

EVACUATION

- Fire
- If tank, rail car or tank truck is involved in a fire, ISOLATE for 800 meters (1/2 mile) in all directions; also, consider initial evacuation for 800 meters (1/2 mile) in all directions.



SAMPLE KEY

SAMPLE NUMBER: F97-0092 LOCATION: ROSWELL STATION

MATRIX: SOIL

SAMPLE DESCRIPTION: EXCAVATED AREA IN S.E. CORNER OF PIPE STORAGE AREA

S D CONTINUED:

S D CONTINUED:

SAMPLE TIME: 10:15 SAMPLE DATE: 07/17/97





PARAGON ANALYTICS, INC.

225 Commerce Drive ♦ Fort Collins, CO 80524 ♦ (800) 443-1511 ♦ (970) 490-1511 ♦ FAX (970) 490-1522

August 11, 1997

Mr. Darrell Campbell
El Paso Natural Gas CO.
8645 Railroad Drive
El Paso, TX 79904

RE: Paragon Workorder: 97-07-167
Client Project Name: Roswell Pipeline District
Client Project Number: F97-0092

Dear Mr. Campbell:

One soil sample was received from El Paso Natural Gas Co. on July 18, 1997. The sample was scheduled for Total Extractable Hydrocarbons (Diesel), Metals, Extractable Organic Halides and PCBs analysis. The results for these analyses are contained in the enclosed report.

Thank you for your confidence in Paragon Analytics, Inc. Should you have any questions, please call.

Sincerely,

Paragon Analytics, Inc.
Victoria Bayly
Project Manager

VB/asg
Enclosure: report



An Employee Owned Small Business



Paragon Analytics, Inc.

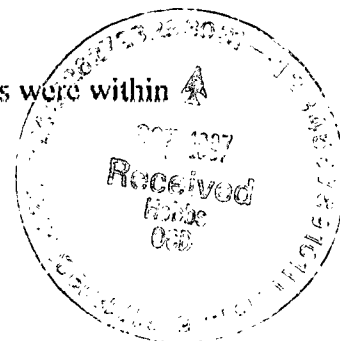
Total Extractable Hydrocarbons (Diesel) Case Narrative

El Paso Natural Gas Co.

Roswell Pipeline District F97-0092

Order Number - 9707167

1. This report consists of 1 soil sample received by Paragon on 07/18/97.
2. The soil sample was extracted by adding a methanol /water solution to the soil followed by hexane. This mixture is shaken and the hexane portion of the two-phase solution is removed for analysis.
3. The extracts were then analyzed using GC with a DB-5.625 capillary column and a flame ionization detector (FID) according to protocols generally based on SW-846 Method 8000. The procedures are based on this general method because SW-846 does not have a specific method for TEPH or diesel range organics. The only true modification from this method is that TEPH(diesel) is a multicomponent mixture and is quantitated by summing the entire range, rather than individual peaks. All positive results were quantitated using the responses from the initial calibration curve using the external standard technique. Also, a confirmation column is not used, because the analyte is a multicomponent mixture and the specific carbon range of the peaks detected are specified on the individual sample reporting forms.
4. All samples were extracted and analyzed within the established holding times.
5. The method blank associated with this project was below the reporting limits for all analytes.
6. All matrix spike and matrix spike duplicate recoveries and RPDs were within A acceptance criteria.



PARAGON ANALYTICS, INC.



7. All blank spike and blank spike duplicate recoveries and RPDs were within the acceptance criteria.
8. All surrogate recoveries were within acceptance criteria.
9. All initial and continuing calibration criteria were within acceptance criteria,

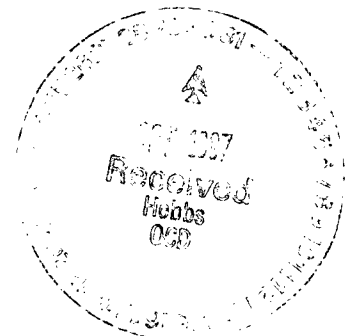
The data contained in the following report have been reviewed and approved by the personnel listed below. In addition, Paragon Analytics, Inc. certifies that the analyses reported herein are true, complete and correct within the limits of the methods employed.

Roland P. Bruggeman
Roland P. Bruggeman
Organics Manager

8-11-97
Date

HA
Reviewer's Initials

8-11-97
Date



PARAGON ANALYTICS, INC.

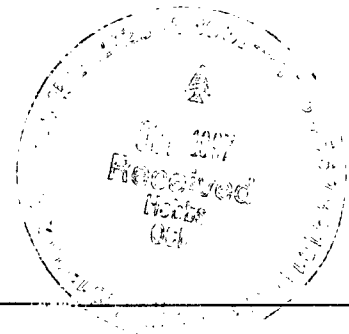
Paragon Analytics, Inc.

SAMPLE NUMBER(S) CROSS-REFERENCE TABLE

Client Name: El Paso Natural Gas Co.

Client Project ID: Roswell Pipeline District F97-0092

PAI-ID	Client ID	MATRIX	DATE SAMPLED
9707167-1	F970092	Soil	07/17/97



Total Extractable Petroleum Hydrocarbons

Modified Method 8015

Lab Name: Paragon Analytics, Inc.
Client Name: El Paso Natural Gas Co.
Client Project ID: Roswell Pipeline District

Lab Sample ID: SRB1 07/23/97

Sample Matrix: Sodium Sulfate

Cleanup: N/A

% Moisture: 0 %

Results based on wet weight

Sample ID

Reagent Blank

Date Collected: N/A

Date Extracted: 7/23/97

Date Analyzed: 7/24/97

Sample Weight: 20 g

Final Volume: 5 mL

Dilution Factor: 1

Analyte	Conc (mg/kg)	Reporting Limit (mg/kg)
TEPH ¹	ND	5.0

SURROGATE RECOVERY

Analyte	% Recovery	% Rec Limits
Hexacosane	85	54 - 146

ND = Not Detected at or above client requested reporting limit.

TEPH¹ = Any combination of diesel and other hydrocarbons within the range of C8 - C36 quantitated as diesel.



Total Extractable Petroleum Hydrocarbons

Modified Method 8015

Lab Name: Paragon Analytics, Inc.
Client Name: El Paso Natural Gas Co.
Client Project ID: Roswell Pipeline District

Lab Sample ID: 9707167-1

Sample Matrix: Soil
Cleanup: N/A
% Moisture: 0 %
Results based on wet weight

Sample ID

F970092

Date Collected: 7/17/97
Date Extracted: 7/23/97
Date Analyzed: 7/24/97

Sample Weight: 20 g
Final Volume: 5 mL
Dilution Factor: 1

Analyte	Conc (mg/kg)	Reporting Limit (mg/kg)
TEPH ¹	200 #	5.0

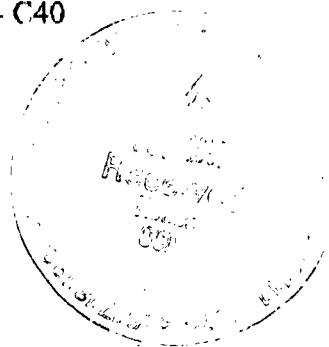
SURROGATE RECOVERY

Analyte	% Recovery	% Rec Limits
Hexacosane	100	54 - 146

ND = Not Detected at or above client requested reporting limit.

TEPH¹ = Any combination of diesel and other hydrocarbons within the range of C8 - C36 quantitated as diesel.

- The chromatogram indicates hydrocarbons in the range of C10 - C40



Total Extractable Petroleum Hydrocarbons Blank Spike
Modified Method 8015

Lab Name: Paragon Analytics, Inc.
Client Name: El Paso Natural Gas Co.
Client Project ID: Roswell Pipeline District

Lab Sample ID: SBS1 07/23/97

Sample Matrix: Sodium Sulfate

Sample ID

Blank Spike

Date Extracted: 7/23/97

Date Analyzed: 7/24/97

Sample Weight: 20 g

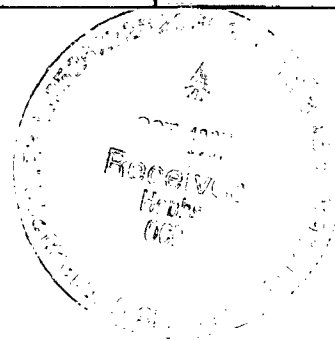
Final Volume: 5 mL

Analyte	Spike Added (mg/kg)	BS Concentration (mg/kg)	BS Percent Recovery	QC Limits % Rec
Diesel	50.0	51.6	103	43 - 139

Analyte	Spike Added (mg/kg)	BSD Concentration (mg/kg)	BSD Percent Recovery	RPD	QC Limits RPD
Diesel	50.0	51.6	103	0	20

SURROGATE RECOVERY BS/BSD

Analyte	% Recovery BS	% Recovery BSD	% Rec Limits
Hexacosane	88	88	54 - 146



Total Extractable Petroleum Hydrocarbons Matrix Spike

Modified Method 8015

Lab Name: Paragon Analytics, Inc.
Client Name: El Paso Natural Gas Co.
Client Project ID: Roswell Pipeline District

Sample ID

In House

Lab Sample ID: 9707168-9MS

Sample Matrix: Soil

% Moisture: 0 %

Results based on wet weight

Date Collected: 7/16/97

Date Extracted: 7/23/97

Date Analyzed: 7/24/97

Sample Weight: 20 g

Final Volume: 5 mL

Dilution Factor: 1

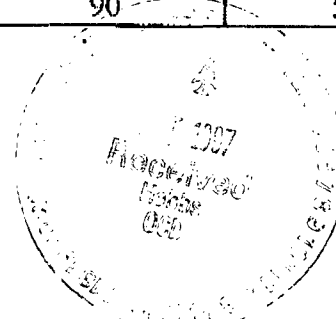
Analyte	Spike Added (mg/kg)	Sample Concentration (mg/kg)	MS Concentration (mg/kg)	MS Percent Recovery	QC Limits % Rec
Diesel	50.0	12.7	64.0	103	43 - 139

Analyte	Spike Added (mg/kg)	MSD Concentration (mg/kg)	MSD Percent Recovery	RPD	QC Limits RPD
Diesel	50.0	63.3	101	1	20

SURROGATE RECOVERY MS/MSD

Analyte	% Recovery MS	% Recovery MSD	% Rec Limits
Hexacosane	88	90	54 - 146

ND = Not Detected





Paragon Analytics, Inc.

METALS CASE NARRATIVE

El Paso Natural Gas Co.

Roswell Pipeline District -- F97-0092

Order Number - 9707167

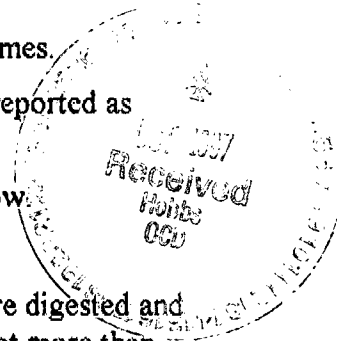
1. This report consists of 1 soil sample for total and TCLP analyses.
2. The sample was received intact on 07/18/97. Temperature of the sample upon receipt was 11° Celsius.
3. The sample was prepared for analysis based on SW-846, 3rd Edition procedures. For the analysis of TCLP chromium an aliquot of the sample was extracted following method 1311.

For analysis by Trace ICP, the TCLP leachate was digested following method 3010A at a 10 fold dilution and the soil sample was digested following method 3050A.

4. The sample was analyzed following SW846 protocols by Trace ICP (Method 6010A).
5. All standards and solutions are NIST traceable and were used within their recommended shelf life.
6. The sample was prepared and analyzed within the established hold times.
7. Sample results which are below PAI's standard reporting limits are reported as "ND" on the enclosed report.

All in house quality control procedures were followed, as described below.

8. General quality control procedures.
 - A preparation (method) blank and laboratory control sample were digested and analyzed with the samples in each digestion batch. There were not more than 20 samples in each digestion batch.
 - The preparation (method) blank results associated with each batch were below the reporting limits for the requested analyte. This indicates that no contaminants were introduced to the samples during the digestion procedures.
 - The laboratory control samples associated with each batch were within acceptance limits. This indicates complete digestions according to the method.



PARAGON ANALYTICS, INC.



- All initial and continuing calibration blanks associated with each batch were below the reporting limits for the requested analyte. This indicates a valid calibration and stable instrument conditions.
 - All initial and continuing calibration verifications associated with each batch were within acceptance criteria for the requested analyte. This indicates a valid calibration and stable instrument conditions.
 - The interference check samples, and high standard readbacks associated with Method 6010A analyses were within acceptance criteria.
9. A sample from another Order Number was used as the QC sample for each batch.
- A matrix spike and matrix spike duplicate were digested and analyzed with each batch. All acceptance criteria for accuracy were met.
 - A matrix duplicate and spike duplicate were digested and analyzed with each batch. All acceptance criteria for precision were met.
 - A serial dilution was analyzed with each batch. All acceptance criteria were met.

The data contained in the following report have been reviewed and approved by the personnel listed below:

Darryl Patrick
Darryl Patrick
Senior Inorganic Chemist

8/4/97
Date

YH
Reviewer's Initials

8/4/97
Date

CERTIFICATION

Paragon Analytics, Inc. certifies that the analyses reported herein are true, complete and correct within the limits of the methods employed.



PARAGON ANALYTICS, INC.

Paragon Analytics, Inc.

SAMPLE NUMBER(S) CROSS-REFERENCE TABLE

Client Name: El Paso Natural Gas Co.

Client Project ID: Roswell Pipeline District F97-0092

PAI-ID	Client ID	MATRIX	DATE
			SAMPLED
9707167-1	F970092	Soil	07/17/97



TOTAL CHROMIUM

Lab Name: Paragon Analytics, Inc.
Client Name: El Paso Natural Gas Co.
Client Project ID: Roswell Pipeline District -- F97-0092
Order Number: 9707167

Date Collected: 07/17/97

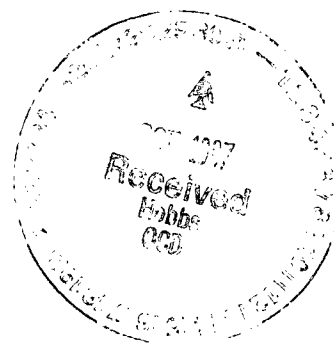
Prep Date: 07/24/97

Date Analyzed: 07/26/97

Sample Matrix: Soil

Analyte	Client Sample ID	Lab Sample ID	Concentration mg/kg	Reporting Limit mg/kg
Chromium	Reagent Blank	RB 9707167	ND	1
Chromium	F970092	9707167-1	11	1

ND = Not detected at or above the reporting limit.



TOTAL CHROMIUM MATRIX SPIKE

Lab Name: Paragon Analytics, Inc.
Client Name: El Paso Natural Gas Co.
Lab Sample ID: 9707168-1

Sample ID

In House

Sample Matrix: Soil

Prep Date: 07/24/97
Date Analyzed: 07/26/97

Analyte	Spike Added mg/kg	Sample Conc. mg/kg	MS Conc. mg/kg	% Rec (limits 80-120%)	Flags
Chromium	20	16	38	110	

Analyte	MSD Conc. mg/kg	MSD % Rec (limits 80-120%)	Relative % Difference (limits 0-20%)	Flags
Chromium	37	105	3	



TCLP CHROMIUM

Lab Name: Paragon Analytics, Inc.
Client Name: El Paso Natural Gas Co.
Client Project ID: Roswell Pipeline District -- F97-0092
Order Number: 9707167

Date Collected: 07/17/97
Prep Date: 07/24/97
Date Analyzed: 07/26/97

Sample Matrix: TCLP Leachate

EPA HW Number: D007
CAS Number: 7440-47-3

Analyte	Client Sample ID	Lab Sample ID	Concentration mg/L	Reporting Limit mg/L
Chromium	Reagent Blank	RB 9707167	ND	0.1
Chromium	F970092	9707167-1	ND	0.1

ND = Not detected at or above the reporting limit.



TCLP CHROMIUM MATRIX SPIKE

Lab Name: Paragon Analytics, Inc.
Client Name: El Paso Natural Gas Co.
Lab Sample ID: 9707223-1

Sample ID

In House

Sample Matrix: TCLP Leachate

Prep Date: 07/24/97

Date Analyzed: 07/26/97

Analyte	Spike Added mg/L	Sample Conc. mg/L	MS Conc. mg/L	% Rec (limits 80-120%)	Flags
Chromium	2.0	< 0.1	2.0	100	

Analyte	MSD Conc. mg/L	MSD % Rec (limits 80-120%)	Relative % Difference (limits 0-20%)	Flags
Chromium	2.0	100	0	





Paragon Analytics, Inc.

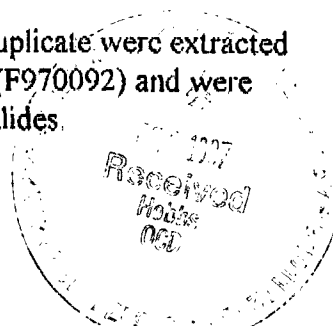
EXTRACTABLE ORGANIC HALIDES CASE NARRATIVE

El Paso Natural Gas Co.

Roswell Pipeline District / F97-0092

Order Number - 9707167

1. This report consists of one soil sample.
2. The sample was received intact at a temperature of 11° C. on July 18, 1997.
3. The sample had been correctly preserved for the requested analysis.
4. The sample was analyzed using the Mitsubishi Tox 10 sigma instrument. The procedure is briefly summarized below.
 - 4.1 5g of soil was extracted with 5ml of ethyl acetate (using ultrasonic agitation).
 - 4.2 A 25ul aliquot of extract was placed in a quartz pyrolysis boat and was pyrolyzed at 900 degrees C.
 - 4.3 Inorganic halides formed during pyrolysis were carried into a titration cell by a carrier gas (Ar and O2).
 - 4.4 The inorganic halides were quantified by coulometric Ag titration.
5. General Quality Control Procedures
 - A preparation (method) blank sample was extracted and analyzed with the samples in this batch and was below the reporting limits for extractable organic halides.
 - All initial and continuing calibration verifications associated with this batch were within acceptance criteria for extractable organic halides. This indicates a valid calibration and stable instrument conditions.
 - A matrix duplicate, matrix spike and matrix spike duplicate were extracted and analyzed with this batch on sample 9707167-1 (F970092) and were within acceptance criteria for extractable organic halides.



PARAGON ANALYTICS, INC.



The data contained in the following report have been reviewed and approved by the personnel listed below:

Tyler Knaebel
Tyler Knaebel
EOX Analyst

07/31/97
Date

SW
Reviewer's Initials

7/31/97
Date

CERTIFICATION

Paragon Analytics, Inc. certifies that the analyses reported herein are true, complete and correct within the limits of the methods employed.



PARAGON ANALYTICS, INC.

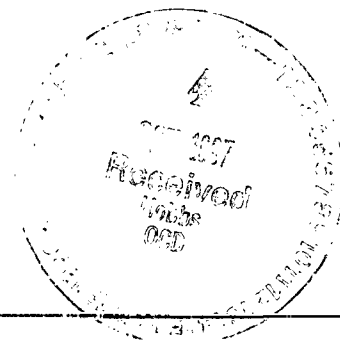
Paragon Analytics, Inc.

SAMPLE NUMBER(S) CROSS-REFERENCE TABLE

Client Name: El Paso Natural Gas Co.

Client Project ID: Roswell Pipeline District F97-0092

PAI-ID	Client ID	MATRIX	DATE SAMPLED
9707167-1	F970092	Soil	07/17/97



Extractable Organic Halides

Method 506E

Sample Results

Page 1 of 1

Lab Name: Paragon Analytics, Inc.

ClientName: El Paso Natural Gas Co.

Client Project ID: Roswell Pipeline District F97-0092

Work Order Number: 9707167

Reporting Basis: AS RECEIVED

Reported on: Thursday, July 31, 1997

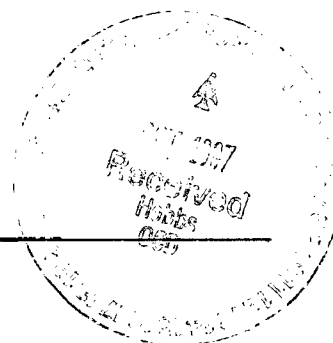
Final Volume: 5 ML

Matrix: Soil

Client Sample ID	Lab ID	Date Collected	Date Prepared	Date Analyzed	Percent Moisture	Dilution Factor	Result	Units	Detection Limit	Flag	Sample Aliquot
F970092	9707167-1	7/17/97	7/31/97	7/31/97	N/A	1	ND	MG/KG	10		5 G

Comments:

1. ND = Not Detected at or above the client requested detection limit.



Extractable Organic Halides

Method 506E

Duplicate Sample Results

Lab Name: Paragon Analytics, Inc.

Page 1 of 1

ClientName: El Paso Natural Gas Co.

Client Project ID: Roswell Pipeline District F97-0092

Work Order Number: 9707167

Sample Aliquot: 5 G

Final Volume: 5 ML

Reporting Basis: AS RECEIVED

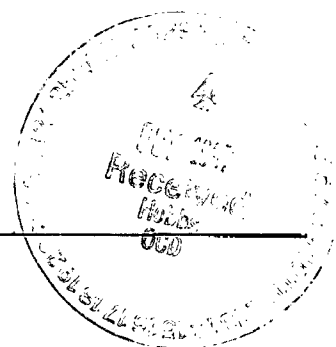
Reported on: Thursday, July 31, 1997

Matrix: Soil

Client Sample ID	Lab ID	Date Prepared	Date Analyzed	Dilution Factor	Duplicate Result	Units	Sample Result	Detection Limit	Flag	RPD	RPD Limit
F970092	9707167-1	7/31/97	7/31/97	1	ND	MG/KG	ND	10		0	20

Comments:

1. ND = Not Detected at or above the client requested detection limit.



Extractable Organic Halides

Method 506E

Matrix Spike And Matrix Spike Duplicate

Lab Name: Paragon Analytics, Inc.

Work Order Number: 9707167

Client Name: El Paso Natural Gas Co.

Page 1 of 1

Client/Project ID: Roswell Pipeline District F97-0092

Reported on: Thursday, July 31, 1997

Lab ID: 9707167-1
Field ID: F970092

Sample Matrix: Soil

Date Collected: 17-Jul-97

Dilution: 1

% Moisture: N/A

Date Extracted: 31-Jul-97

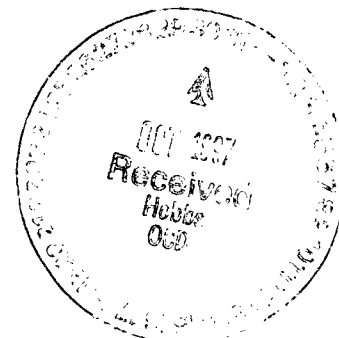
Report Basis: AS RECEIVED

Date Analyzed: 31-Jul-97

Prep Batch: TX970731-1A

Spike Added	Sample Result	Units	Reporting Limit	MS Result	MS % Rec.	MS Qualifier	Control Limits	Initial Vol/Wt	Final Vol/Wt
100	ND	MG/KG	10	83	83		N/A	5 G	5 ML

Spike Added	MSD Result	Units	Reporting Limit	MSD % Rec.	Result Qualifier	RPD	RPD Limits	Initial Vol/Wt	Final Vol/Wt
100	82	MG/KG	10	82		0	20	5 G	5 ML





Paragon Analytics, Inc.

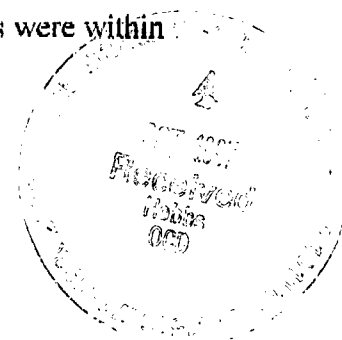
PCBs Case Narrative

El Paso Natural Gas Co.

Rosewell Pipeline District -- F97-0092

Order Number - 9707167

1. This report consists of 1 soil sample received by Paragon on 07/31/97.
2. This sample was extracted and analyzed according to SW-846, 3rd Edition procedures. Specifically, the soil sample was extracted using soxhlet procedures based on Method 3540. The extracts were then processed using sulfuric acid cleanup by Method 3665 in an attempt to remove potential interferences.
3. The extracts were then analyzed using GC/ECD (electron capture detectors) with a RTX-1701 capillary column according to protocols based on Method 8081. All positive results were then confirmed on a RTX-50 column. The quantitation of each analyte is the lower of the concentrations obtained from each column. This minimizes the chances of reporting elevated results based on interferences.
4. All samples were extracted and analyzed within the established holding times.
5. The method blank associated with this project was below the reporting limits for all analytes.
6. All blank spike and blank spike duplicate recoveries and RPDs were within the acceptance criteria.
7. All matrix spike and matrix spike duplicate recoveries and RPDs were within acceptance criteria.
8. All surrogate recoveries were within acceptance criteria.



PARAGON ANALYTICS, INC.



9. Sample 9707167-1 was analyzed at a higher dilution in order to get target analytes within the calibration range of the instrument. The reporting limits have been adjusted accordingly.
10. All initial and continuing calibration criteria were within acceptance criteria.

The data contained in the following report have been reviewed and approved by the personnel listed below. In addition, Paragon Analytics, Inc. certifies that the analyses reported herein are true, complete and correct within the limits of the methods employed.

Marty A. Brown
Marty Brown
GC Analyst

2-30-97
Date

RJB
Reviewer's Initials

7-30-97
Date



PARAGON ANALYTICS, INC.

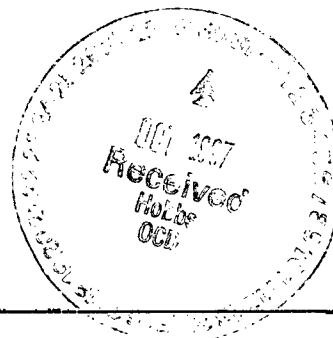
Paragon Analytics, Inc.

SAMPLE NUMBER(S) CROSS-REFERENCE TABLE

Client Name: El Paso Natural Gas Co.

Client Project ID: Roswell Pipeline District F97-0092

PAI-ID	Client ID	MATRIX	DATE SAMPLED
9707167-1	F970092	Soil	07/17/97



AROCLORS

Method 8081

Sample ID

Lab Name: Paragon Analytics, Inc.

Client Name: El Paso Natural Gas Co.

Client Project ID: Roswell Pipeline District -- F97-0092

Reagent Blank

Lab Sample ID: SRB1 7/24/97

Date Collected: N/A

Date Extracted: 7/24/97

Date Analyzed: 7/28/97

Sample Matrix: Sodium Sulfate

Cleanup: Sulfuric Acid

% Moisture: 0 %

Results based on wet weight

Sample Weight: 30 g

Final Volume: 10 mL

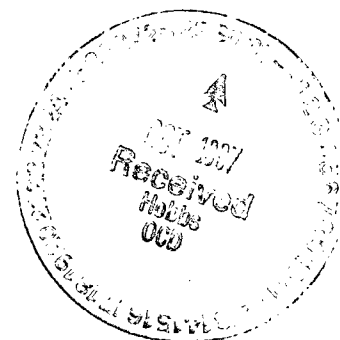
Dilution Factor: 1

Analyte	Conc (ug/kg)	Reporting Limit (ug/kg)
Aroclor 1016	ND	33
Aroclor 1221	ND	67
Aroclor 1232	ND	33
Aroclor 1242	ND	33
Aroclor 1248	ND	33
Aroclor 1254	ND	33
Aroclor 1260	ND	33

SURROGATE RECOVERY

Analyte	% Recovery	% Rec Limits
2,4,5,6-Tetrachloro-m-xylene	93	47 - 137
Decachlorobiphenyl	97	34 - 129

ND = Not Detected at or above client requested reporting limit.



AROCLORS

Method 8081

Clean Soil 1 ppm

Cleanup Levels
1 ppm in a water course

25 ppm elsewhere

< 50 ppm Not Regulated Regulated

.001 ppm in a w New Mexico

Sample ID

Lab Name: Paragon Analytics, Inc.

Client Name: El Paso Natural Gas Co.

Client Project ID: Roswell Pipeline District -- F97-0092

F970092

Lab Sample ID: 9707167-1

Date Collected: 1/01/96

Date Extracted: 7/24/97

Date Analyzed: 7/28/97

Sample Matrix: Soil

Cleanup: Sulfuric Acid

% Moisture: 0 %

Results based on wet weight

Sample Weight: 30 g

Final Volume: 10 mL

Dilution Factor: 5

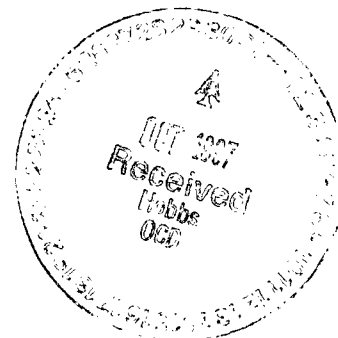
TOSCA Not Listed

Analyte	Conc (ug/kg)	Reporting Limit (ug/kg)
Aroclor 1016	ND	170
Aroclor 1221	ND	330
Aroclor 1232	ND	170
Aroclor 1242	ND	170
Aroclor 1248	ND	170
Aroclor 1254	460 .460 ppm	170
Aroclor 1260	ND	170

SURROGATE RECOVERY

Analyte	% Recovery	% Rec Limits
2,4,5,6-Tetrachloro-m-xylene	124	47 - 137
Decachlorobiphenyl	106	34 - 129

ND = Not Detected at or above client requested reporting limit.



AROCLOR BLANK SPIKE

Method 8081

Sample ID

Lab Name: Paragon Analytics, Inc.

Client Name: El Paso Natural Gas Co.

Client Project ID: Roswell Pipeline District -- F97-0092

Lab Sample ID: SBS1 7/24/97

Date Extracted: 7/24/97

Date Analyzed: 7/28/97

Sample Matrix: Sodium Sulfate

Cleanup: Sulfuric Acid

Sample Weight: 30 g

Final Volume: 10 mL

Blank Spike

Analyte	Spike Added (ug/kg)	BS Concentration (ug/kg)	BS Percent Recovery	QC Limits % Rec
Aroclor 1260	167	145	87	67 - 120

Analyte	Spike Added (ug/kg)	BSD Concentration (ug/kg)	BSD Percent Recovery	RPD	QC Limits RPD
Aroclor 1260	167	148	89	2	20

SURROGATE RECOVERY BS/BSD

Analyte	% Recovery BS	% Recovery BSD	% Rec Limits
2,4,5,6-Tetrachloro-m-xylene	97	99	47 - 137
Decachlorobiphenyl	103	104	34 - 129



AROCLOR MATRIX SPIKE

Method 8081

Sample ID

In House

Lab Name: Paragon Analytics, Inc.
Client Name: El Paso Natural Gas Co.
Client Project ID: Roswell Pipeline District -- F97-0092

Lab Sample ID: 9707206-4MS

Date Collected: 7/21/97
Date Extracted: 7/24/97
Date Analyzed: 7/28/97

Sample Matrix: Soil
Cleanup: Sulfuric Acid
% Moisture: 0 %
Results based on wet weight

Sample Weight: 30 g
Final Volume: 10 mL
Dilution Factor: 1

Analyte	Spike Added (ug/kg)	Sample Concentration (ug/kg)	MS Concentration (ug/kg)	MS Percent Recovery	QC Limits % Rec
Aroclor 1260	167	ND	141	85	67 - 120

Analyte	Spike Added (ug/kg)	MSD Concentration (ug/kg)	MSD Percent Recovery	RPD	QC Limits RPD
Aroclor 1260	167	149	89	6	20

SURROGATE RECOVERY MS/MSD

Analyte	% Recovery MS	% Recovery MSD	% Rec Limits
2,4,5,6-Tetrachloro-m-xylene	81	84	47 - 137
Decachlorobiphenyl	105	109	34 - 129

ND = Not Detected





2

4
MAY 27
Received
Public
Doc

CM-36-0506 (Rev. 5)

CONDITION OF SAMPLE UPON RECEIPT

CLIENT: EPN6SHIPPING CONTAINER #: CoolerWORKORDER NO. 9707167INITIALS: NTDATE: 7/12/97

1. Does this project require special handling according to NEESA, Level 3, or CLP protocols? If yes, complete a. and b. a. Cooler Temperature _____ b. Lot No's _____ c. Airbill Number _____	Yes	<u>No</u>
2. Are custody seals on the cooler intact? If so, how many	<u>N/A</u>	No
3. Are custody seals on sample containers intact?	<u>N/A</u>	No
4. Is there a Chain of Custody (COC) or other representative documents, letters or shipping memos?	<u>Yes</u>	No
5. Is the COC complete? Relinquished: Yes ☒ No ☐ Requested Analysis: Yes ☐ No ☒	<u>N/A</u>	No
6. Is the COC in agreement with the samples received? No. of Samples: Yes ☐ No ☒ Sample ID's: Yes ☐ No ☒ Matrix: Yes ☐ No ☒ No. of Containers: Yes ☐ No ☒	<u>Yes</u>	No
7. Are the samples requiring acid preservation preserved correctly?	<u>N/A</u>	No
8. Is there enough sample? If so, are they in the proper containers?	<u>Yes</u>	No
9. Are all samples within holding times for the requested analyses?	<u>Yes</u>	No
10. Were the sample received on ice?	<u>N/A</u>	No
11. Were all sample containers received intact? (not broken or leaking, etc.)	<u>Yes</u>	No
12. Are samples requiring no headspace, headspace free?	<u>N/A</u>	No
13. Do the samples require quarantine?	<u>Yes</u>	<u>No</u>
14. Do samples require Paragon disposal?	<u>Yes</u>	No
15. Did the client return any unused bottles?	<u>Yes</u>	<u>No</u>

Describe "NO" items (except No's 1, 13, & 14): (12) - Ice expiredWas the client contacted? Yes ☐ No ☐

If yes, Date: _____ Name of person contacted: _____

Describe actions taken or client instructions: _____

Group Leader's Signature: _____

Date: _____

Cooler Temperature: 11°

District I - (505) 393-6161
P.O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 8/8/95

Submit Original
Plus 1 Copy
to appropriate
District Office

RECEIVED
RECEIVED
OCT 20 1997
SEP 02 1997
Environmental Bureau
Oil Conservation Division

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Permain Treating Chem.
Verbal Approval Received: Yes ☐ No ☒	5. Originating Site Tatum Yd.
2. Management Facility Destination Gandy Marley Inc.	6. Transporter Permain Treating
3. Address of Facility Operator Box 1658 Roswell N.M. 88202	8. State N.M.
7. Location of Material (Street Address or ULSTR) W. Hiway 380 Tatum	
9. <u>Circle One</u> : A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. ☒ B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

contaminated soils from below chemical dock

OLD HOBBS
OFFICE

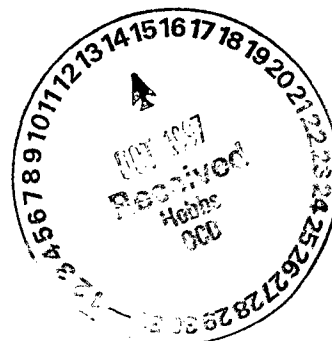
OCT 1 1997

Estimated Volume 5 cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Larry Gandy TITLE: V-P DATE: 9-22-97
Waste Management Facility Authorized Agent
TYPE OR PRINT NAME: Larry Gandy TELEPHONE NO. 505-398-4960

(This space for State Use)
APPROVED BY: [Signature] TITLE: Environ Eng'g DATE: 10/17/97
APPROVED BY: [Signature] TITLE: Env Geologist DATE: 10/20/97

Printed in Hobbs 10/20/97



GANDY MARLEY, INC.
P. O. BOX 827
TATUM, NEW MEXICO 88267
TATUM, NEW MEXICO ROSWELL, NEW MEXICO

CERTIFICATE OF WASTE STATUS
OILFIELD NON-EXEMPT WASTE MATERIAL

Originating Location: Permian Treating Chemical
W, Hiway 380 Tatum N.M. 88267

Source: contaminated soils from below chemical dock

Disposal Location: 34 miles west of Tatum

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for Permian Treating Chemical
concur with the status of the waste from the subject site.

Name Gale Blackwell

Title/Agency owner

Address P.O. Box 815
Tatum, N.M. 88267

Signature Gale Blackwell

Date 10-8-97

OIL FIELD
OFFICE
OCT 17 1997
RECEIVED

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TRACE ANALYSIS, INC.
ATTN: MS. JENNIFER HARDELL
6701 ABERDEEN AVENUE
LUBBOCK, TEXAS 79424
FAX: 806-794-1298

RECEIVING DATE: 07/30/97
SAMPLE TYPE: SOIL EXTRACT
PROJECT : # PT 7-21
FIELD CODE: 77957 CONT. SOIL
PROJECT LOCATION: TATUM, NM.

ANALYSIS DATE: 08/05/97
SAMPLING DATE: 07/21/97
SAMPLE CONDITION: Intact/
Headspace

TCLP VOLATILES (ppm)	SAMPLE 11966	PQL	BLANK	%EA	%IA
1,1-Dichloroethene	ND	0.001	ND	92	115
2-Butanone	ND	0.010	ND		107
Chloroform	ND	0.001	ND		112
Benzene	ND	0.001	ND	97	113
1,2-Dichloroethane	ND	0.001	ND		112
Vinyl Chloride	ND	0.001	ND		111
Carbon Tetrachloride	ND	0.001	ND		111
Trichloroethene	ND	0.001	ND	100	106
Tetrachloroethene	ND	0.001	ND		83
Chlorobenzene	ND	0.001	ND	96	89
1,4-Dichlorobenzene	ND	0.001	ND		113

SYSTEM MONITORING COMPOUNDS
dibromofluoromethane
toluene-d8
4-bromofluorobenzene

% RECOVERY
100
85
96

ND = < PQL
PQL = PRACTICAL QUANTITATION LIMIT
Methods: EPA SW 846-8240, 1311


Michael R. Fowler

8-6-97
Date

ODD HUBBS
OFFICE
OCT 1 1997
RECEIVED

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
Permian Treating Chemicals, Inc.
Attention: Gale Blackwell
PO Box 815
Tatum NM 88267

Date: Jul 29, 1997
Date Rec: 7/22/97
Project: PT 7-21
Proj Name: N/A
Proj Loc: Tatum, NM

Lab Receiving # : 9707000401
Sampling Date: 7/21/97
Sample Condition: Intact and Cool
Sample Received By: JH

TCLP Semivolatiles in Soil (mg/L)	EPA Limit	Reporting Limit *	Method Blank	T77957 Contaminated Soil	QC	RPD	%EA	%IA
Pyridine	5.0	2.5	ND	ND	79	35	17	99
1,4-Dichlorobenzene	7.5	2.5	ND	ND	84	18	45	105
o-Cresol	200.0	2.5	ND	ND	67	4	62	84
m,p-Cresol	200.0	2.5	ND	ND	75	4	58	94
Hexachloroethane	3.0	2.5	ND	ND	83	17	54	104
Nitrobenzene	2.0	0.2	ND	ND	81	16	58	101
Hexachlorobutadiene	0.5	0.15	ND	ND	82	17	55	103
2,4,6-Trichlorophenol	2.0	0.2	ND	ND	69	18	55	86
2,4,5-Trichlorophenol	400.0	2.5	ND	ND	91	13	67	114
2,4-Dinitrotoluene	0.13	0.2	ND	ND	86	16	60	108
2,4-D	10.0	2.5	ND	ND	70	15	37	88
Hexachlorobenzene	0.13	0.25	ND	ND	82	11	65	103
2,4,5-TP	1.0	0.75	ND	ND	83	6	49	104
Pentachlorophenol	100.0	2.5	ND	ND	82	18	62	103

ND = Not Detected

* Elevated reporting limits due to sample matrix interferences.

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Surrogate	% RECOVERY	Surrogate	% RECOVERY
2-Fluorophenol	110	2-Fluorobiphenyl	114
Phenol-D6	105	2,4,6-Tribromophenol	100
Nitrobenzene-d5	112	Terphenyl-d14	105

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/L)
TCLP Semi	EPA 1311	7/23/97	EPA 8270	7/25/97	HW/CC	80 ea	100 ea

Director, Dr. Blair Leftwich

Date

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

TRACE ANALYSIS, INC.

5701 Aberdeen Avenue Lubbock, Texas 79424 806-794-1296 FAX 806-794-1298

ANALYTICAL RESULTS FOR
PERMIAN TREATING CHEMICALS, INC.
Attention: Gale Blackwell

August 14, 1997
Receiving Date: 07/22/97
Sample Type: Soil
Project No: PT 7-21
Project Location: Tatum, NM

P. O. Box 815
Tatum, NM 88267

Extraction Date: 08/05/97
Analysis Date: 08/06/97
Sampling Date: 07/21/97
Sample Condition: Intact
Sample Received by: JH
Project Name: NA

RECEIVED
OCT 17 1997

TA#	Field Code	As	Se	Cr	Cd	Pb	Ag	Ba	Hg
T77957	EPA LIMIT =	5.0	1.0	5.0	1.0	5.0	5.0	100.0	0.20
QC	Contaminated Soil from Cement Contaminant	<0.10	<0.10	<0.05	<0.02	<0.10	<0.05	0.17	<0.01
	Quality Control	5.0	5.0	4.8	4.8	4.8	0.98	5.1	0.045

Reporting Limit 0.10 0.10 0.05 0.02 0.10 0.05 0.10 0.01

2nd Source REF 4.5 90% 5.5 110% 5.2 104% 3.7 74% 5.3 106% -- --

*NOTE: 2nd Source Ref. is out of limits of 90%-110%.
**NOTE: Extraction Accuracy out of range of 80%-120%.

RPD	6	0	0	0	0	7	0	1	0
% Extraction Accuracy	110	85	85	65	85	90	105	66	90
% Instrument Accuracy	100	100	96	96	96	98	102	90	

CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba: RR Hg: HC
METHODS: EPA SW 846-1311, 6010, 7470.
TCLP METALS SPIKE: 2.0 mg/L As, Se, Cd, Cr, Pb, Ba; 0.50 mg/L Ag; 0.05 mg/L Hg.
TCLP METALS QC: 5.0 mg/L As, Se, Cd, Cr, Pb, Ba; 1.0 mg/L Ag; 0.05 mg/L Hg.

Director, Dr. Blair Leftwich

Date

8-14-97

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
Permian Treating Chemicals, Inc.
Attention: Gale Blackwell
PO Box 815
Tatum NM 88267

Date: Aug 14, 1997
Date Rec: 7/22/97
Project: PT 7-21
Proj Name: N/A
Proj Loc: Tatum, NM

Lab Receiving # : 9707000401
Sampling Date: 7/21/97
Sample Condition: Intact and Cool
Sample Received By: JH

TCLP C/T compounds in	Soil (mg/L)	EPA Limit	Reporting Limit	Method Blank	T77957 Contaminated Soil	QC	RFD	SEA*	IA*
Chlordane		0.03	0.001	ND	ND	0.0365	7	140	146
Toxaphene		0.5	0.050	ND	ND	3.1	61	101	155
Lindane		0.4	0.001	ND	ND	0.026	12	133	104
Heptachlor		0.008	0.001	ND	ND	0.033	12	118	132
Heptachlor epoxide		0.008	0.001	ND	ND	0.035	13	130	140
Endrin		0.02	0.001	ND	ND	0.058	9	140	116
Methoxychlor		10.0	0.100	ND	ND	0.37	6	130	148

* All QCs and spikes are 15-30% over acceptable EPA limits for EA and IA.

SURROGATES

% RECOVERY

2,4,5,6-Tetrachloro-m-xylene
deca chlorobiphenyl

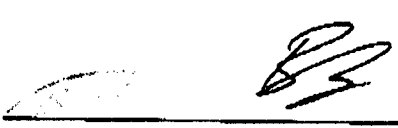
69
63

LABORATORY
ACTION

001 17 1

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TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST
TCLP C/T	EPA 1311	7/21/97	EPA 8080	8/7/97	MB


Director, Dr. Blair Leftwich

8-14-97
Date

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

TRACE ANALYSIS, INC.

6701 Acarden Avenue Lubbock, Texas 79424 806-734-1296 FAX 806-794-1298

ANALYTICAL RESULTS FOR
 PERMIAN TREATING CHEMICALS, INC.
 Attention: Gale Blackwell
 P. O. Box 815
 Tatum, NM 88267

August 14, 1997
 Receiving Date: 07/22/97
 Sample Type: Soil
 Project No: PT 7-21
 Project Location: Tatum, NM

Extraction Date: 07/28/97
 Analysis Date: 07/28/97
 Sampling Date: 07/21/97
 Sample Condition: Intact
 Sample Received by: JH
 Project Name: NA

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 17 1997

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	IGNITABILITY
T77957	EPA LIMIT = Contaminated Soil from Cement Contaminant	Non-reactive	500 <10	250 <2.5	Non-corrosive	<2 >12.5 6.5	Nonignitable
QC	Quality Control	---	---	---	---	7.0	---

RPD 0 0 0 0 0 0 0

% Extraction Accuracy --- --- --- --- --- --- ---

% Instrument Accuracy --- --- --- --- --- --- ---

METHODS: EPA SW 846-2.1.3, 2.1.2, 2.1.1.
 CHEMIST: JT

[Signature]
 Director, Dr. Blair Leftwich

DATE 8-14-97

[Circular Stamp: RECEIVED AUG 15 1997]

401

6701 Aberdeen Avenue Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Phone #: 505-398-4111

FAX #: 505-398-4112

P.O. Box 815

Project Name :

Sampler Signature:

John Backlund

FIELD CODE

Volume/Amount

WATER
SOIL
AIR
SLUDGE

HCL
HNO3
JCE
NONE

DATE
TIME

BTEX, MTBE

TPH

Total Metals Ag As Ba Cd Cr Pb Hg Se

+ TCLP Metals Ag As Ba Cd Cr Pb Hg Se

TCLP Volatiles

TCLP Semi Volatiles

RCI

8240 / 8260

8270

Turn around # of days

Fax ASAP

Hold

ANALYSIS REQUEST

SPECIAL HANDLING

RECEIVED

REMARKS

Date: 7/2/00 Time: 9:30

Received by:

Times

Received by:

Times

Times

Received at Laboratory by

Times

Received at Laboratory by: Date: 2017 Time: 9:20A

Given hand #155790562

203467

District I - (505) 393-0101
P.O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
611 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 8/8/95

Submit Original
Plus 1 Copy
to appropriate
District Office

AUG - 7 1997

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ <i>PER 90. PRICER 8/5/97</i>	4. Generator Koch Oil Co.
Verbal Approval Received: Yes ☒ No ☒	5. Originating Site 6" to 8" pipeline exchange
2. Management Facility Destination GMI Landfarm	6. Transporter Gandy Corp.
3. Address of Facility Operator 34 Miles West of Tatum, NM	8. State NM
7. Location of Material (Street Address or ULSTR)	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. (B) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

100 yards of soil from pipeline leak

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AUG - 7 1997

Environmental Bureau
Oil Conservation Division

RECEIVED

Estimated Volume 100 cy Known Volume (to be entered by the operator at the end of the haul) cy

SIGNATURE: Larry Gandy TITLE: Vice-President DATE: 8-4-97
Waste Management Facility Authorized Agent
TYPE OR PRINT NAME: Larry Gandy TELEPHONE NO. 505-398-4960

(This space for State Use)		
APPROVED BY: <u>[Signature]</u>	TITLE: <u>Fran Fran</u>	DATE: <u>8/5/97</u>
APPROVED BY: <u>[Signature]</u>	TITLE: <u>Environmental</u>	DATE: <u>8/8/97</u>

Printed in Hobbs 7/8/97

GANDY MARLEY, INC.
P. O. BOX 827
TATUM, NEW MEXICO 88267
TATUM, NEW MEXICO ROSWELL, NEW MEXICO

CERTIFICATE OF WASTE STATUS
OILFIELD NON-EXEMPT WASTE MATERIAL

Originating Location: 6" to 8" Pipeline exchange

Source: pipeline leak 10 mi S AMM 5ct E 11 mi

Disposal Location: GMI Landfarm 34 miles west of Tatum, NM

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for Koch Oil Co.
concur with the status of the waste from the subject site.

Name Paul L. Holland

Title/Agency TEAM LEADER / KOCH OIL CO.

Address 2121 French Dr - Hobbs NM 88240

Signature Paul L. Holland

Date 8-5-97

DD HOBBS
OFFICE
AUG 05 1997
RECEIVED

TRACE ANALYSIS, INC.

6701 Aberdeer Avenue

Lubbock, Texas 79424

806-794-7296

FAX 806-794-1298

ANALYTICAL RESULTS FOR

Koch Oil Co
Attention Paul Holland
2121 N French Drive
Hobbs NM 88240

Date: Jul 10, 1997

Date Rec: 7/3/97

Project: Gan 97-06

Proj Name: N/A

Proj Loc: 6 to 8 Pig Exchanger

Lab Receiving #: 9707000081

Sampling Date: 7/2/97

Sample Condition: Intact and Cool

Sample Received By: JH

TA#	Field Code	MATRIX	TRPHC (mg/Kg)	MTBE (mg/Kg)	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL- BENZENE (mg/Kg)	M, P, O XYLENE (mg/Kg)	TOTAL BTX (mg/Kg)
T 76846	Backfill Backgrd	Soil	193	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050
QC			104	0.100	0.093	0.094	0.090	0.278	
RPD			11	7	6	5	4	4	
† Extraction Accuracy			104	100	92	99	100	104	
† Instrument Accuracy			104	100	93	94	90	93	

RECEIVED
JUL 05 1997
LABORATORY

Reporting Limit:

10 0.05 0.05 0.05 0.05 0.05

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/Kg)
MTBE/BTEX	EPA 5030	7/8/97	EPA 8020	7/8/97	AG	0.100 ea	5 ea
TRPHC	EPA 3550	7/3/97	EPA 418.1	7/7/97	MS	100	250

Director, Dr. Blair Leftwich

Date

7-10-97

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

**ANALYTICAL RESULTS FOR
KOCH OIL CO.**
Attention: Paul Holland
2121 N. French Drive
Hobbs, NM 88240

July 31, 1997

Receiving Date: 07/03/97

Sample Type: Soil

Project No: GAN 97-06

Project Location: 6 to 8 Pig Exchanger

Extraction Date: 07/03/97

Analysis Date: 07/11/97

Sampling Date: 07/02/97

Sample Condition: I & C

Sample Received by: JH

Project Name: NA

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T76847 Contaminated Excavation	OC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	70	133*	21	88
1,4-Dichlorobenzene	7.5	0.05	ND	79	9	38	99
o-Cresol	200.0	0.05	ND	71	2	44	89
m,p-Cresol	200.0	0.05	ND	68	4	43	85
Total Cresol	200.0	0.05	ND	—	9	—	—
Hexachloroethane	3.0	0.05	ND	79	2	43	99
Nitrobenzene	2.0	0.05	ND	82	4	49	103
Hexachlorobutadiene	0.5	0.05	ND	84	1	48	105
2,4,6-Trichlorophenol	2.0	0.05	ND	76	2	59	95
2,4,5-Trichlorophenol	400.0	0.05	ND	82	11	61	103
2,4-Dinitrotoluene	0.13	0.05	ND	82	0	53	103
2,4-D	10.0	0.05	ND	87	12	41	109
Hexachlorobenzene	0.13	0.05	ND	84	9	63	105
2,4,5-TP	1.0	0.05	ND	79	16	47	99
Pentachlorophenol	100.0	0.05	ND	81	2	58	101
Chlordane	0.03	0.001	ND	0.020	13	94	80
Toxaphene	0.5	0.05	ND	1.37	12	81	68
Lindane	0.4	0.001	ND	0.018	16	111	72
Heptachlor	0.008	0.001	ND	0.021	7	111	84
Heptachlor epoxide	0.008	0.001	ND	0.020	12	101	80
Total Heptachlor	0.008	0.001	ND	—	—	—	—
Endrin	0.02	0.001	ND	0.043	2	129	86
Methoxychlor	10.0	0.1	ND	0.18	2	109	72
Surrogates	% RECOVERY						
2-Fluorophenol	43						
Phenol-d6	29						
Nitrobenzene-d5	68						
2-Fluorobiphenyl	66						
2,4,6-Tribromophenol	80						
Terphenyl-d14	87						

**Estimated concentration due to spike

Methods: EPA SW 846-1311, 8270, 8080.

CHEMIST: HW/RW/CC/MB

ND - Not Detected

BS
Director, Dr. Blair Leftwich

7-31-97
DATE

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1796

FAX 806•794•1298

Date: Jul 07, 1997

Date Rec: 7/3/97

Project: Gan 97-06

Proj Name: N/A

Proj Loc: 6 to 8 Pig Exchanger

ANALYTICAL RESULTS FOR

Koch Oil Co

Attention Paul Holland

2121 N French Drive

Hobbs

NM 88240

Lab Receiving # : 9707000081

Sampling Date: 7/2/97

Sample Condition: Intact and Cool

Sample Received By: JH

TA#	Field Code	MATRIX	TRPHC (mg/Kg)
T76847	Cont Excavation	Soil	27.800
QC			104
RPD			11
% Extraction Accuracy:			104
% Instrument Accuracy:			104

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JUL 11 1997

Reporting Limit:

10

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/Kg)
TRPHC	EPA 3550	7/3/97	EPA 418.1	7/7/97	MS	100	250


Director, Dr. Blair Leftwich7-7-97
Date
TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

ANALYTICAL RESULTS FOR

KOCH OIL COMPANY

Attention: Paul Holland

2121 N. French Drive

Hobbs, NM 88240

July 18, 1997

Receiving Date: 07/03/97

Sample Type: Soil

Project No: Gan 97-06

Project Location: 6 to 8 Pig Exchanger

Extraction Date: 07/06/97

Analysis Date: 07/06/97

Sampling Date: 07/02/97

Sample Condition: Intact

Sample Received by: JH

Project Name: NA

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	IGNITABILITY
EPA LIMIT =			500	250		<2 >12.5	
T76847	Contaminated Excavation	Non-reactive	<10	<2.5	Non-corrosive	7.9	Nonignitable
QC	Quality Control					7.0	
RPD		0	0	0	0	0	0
% Extraction Accuracy							
% Instrument Accuracy						100	

METHODS: EPA SW 846-2.1.3, 2.1.2, 2.1.1.

CHEMIST: JT

Director, Dr. Blair Leftwich

DATE

7-18-97



TRACE ANALYSIS, INC.

670 Aberdeen Avenue

Lubbock, Texas 79424

805-754-1296

FAX 806-754-1298

ANALYTICAL RESULTS FOR

KOCH OIL COMPANY

Attention: Paul Holland

2121 N. French Drive

Hobbs, NM 88240

July 18, 1997

Receiving Date: 07/03/97

Sample Type: Soil

Project No: Gan 97-06

Project Location: 6 to 8 pig Exchanger

Extraction Date: 07/08/97

Analysis Date: 07/09/97

Sampling Date: 07/02/97

Sample Condition: Intact

Sample Received by: JH

Project Name: NA

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cd	Cr	Pb	Ag	Ba	Hg
EPA LIMIT =		5.0	1.0	1.0	5.0	5.0	5.0	100.0	0.20
T76847	Contaminated Excavation	<0.10	<0.10	<0.05	<0.05	<0.10	<0.01	1.8	<0.01
QC	Quality Control	5.2	4.7	5.3	5.2	4.7	1.0	5.0	0.0495
Reporting Limit		0.10	0.10	0.05	0.05	0.10	0.01	0.20	0.01
RPD		1	0	0	0	0	9	0	22
% Extraction Accuracy		99	100	105	100	100	85	105	90
% Instrument Accuracy		104	94	106	103	94	104	99	99

CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba: RR Hg: HC

METHODS: EPA SW 846-1311, 6010, 7470.

TCLP METALS SPIKE: 2.0 mg/L As, Se, Cd, Cr, Pb, Ba: 0.1 mg/L Ag: 0.05 mg/L Hg.

TCLP METALS QC: 5.0 mg/L As, Se, Cd, Cr, Pb, Ba: 1.0 mg/L Ag: 0.05 mg/L Hg.

BS

Director, Dr. Blair Leftwich

RECEIVED

7-18-97

Date

P.O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

Energy Minerals & Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form O-150
Originated 8/8/95

Submit Original
Plus 1 Copy
to appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ <i>PER ULSTR</i>	4. Generator TRANSWESTERN PIPELINE
Verbal Approval Received: Yes ☒ No ☒	5. Originating Site ATOKA #1
2. Management Facility Destination GANDY-MARLEY, INC.	6. Transporter GANDY CORPORATION
3. Address of Facility Operator P.O. BOX 827, TATUM	8. State NEW MEXICO
7. Location of Material (Street Address or ULSTR) 37 MILES WEST OF TATUM, NM ON HIGHWAY 380	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

RECEIVED

JUL 14 1997

BRIEF DESCRIPTION OF MATERIAL:

CONTAMINATED SOIL FROM COMPRESSOR STATION

Environmental Bureau
Oil Conservation Division

Att: MARTINE KIELING - GAVE VERBAL APPROVAL
PER OUR FILE COM
7/8/97 J

OLD HUBBS
JUL 8 1997
RECEIVED

Estimated Volume 70 cy Known Volume (to be entered by the operator at the end of the haul) cy

SIGNATURE: Larry Gandy TITLE: VICE-PRESIDENT DATE: 5-8-97
Waste Management Facility/Authorized Agent
TYPE OR PRINT NAME: LARRY GANDY TELEPHONE NO. 505-398-4960

(This space for State Use)
APPROVED BY: [Signature] TITLE: Envr Engn DATE: 6/2/97
APPROVED BY: Martina J. Kieling TITLE: Environmental Geologist DATE: 7/14/97

Printed in Hobbs 7/14/97 MK

Summit, INC.
P. O. BOX 827
TATUM, NEW MEXICO 88267
TATUM, NEW MEXICO ROSWELL, NEW MEXICO

CERTIFICATE OF WASTE STATUS
OILFIELD NON-EXEMPT WASTE MATERIAL

Originating Location: Atoka 1 Compressor Station

Source: oil stained soil at compressor station

Disposal Location: Gandy - Marley, Inc.

P.O.Box 827, Tatum 37 miles west of Tatum N.M. on Hiway 380

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for Enron Transportation & Storage concur with the status of the waste from the subject site.

Name James R. Russell

Title/Agency Environmental Specialist

Address Summit Office Bld. Ste. 250 4001 Indian School rd.

Albuquerque New Mexico 87110

Signature James R. Russell

Date 5-19-92

COPIES
MAILED
MAY 21 1992
RECEIVED

MEMORANDUM OF CONVERSATION

✓ TELEPHONE _____ PERSONAL _____ TIME 11:10 DATE 5/8/97

ORIGINATING PARTY Butch Russel 505-260-7011
James R.

OTHER PARTIES Martyne Kieling

DISCUSSION Sending Chain of Custody For Data Packet
Will Be Sending the C-138 as soon as
Gandy Signs

7/8/97 Verbal approval By Wayne Price
Still waiting on C-138 to come through From
Tim G.

CONCLUSIONS _____

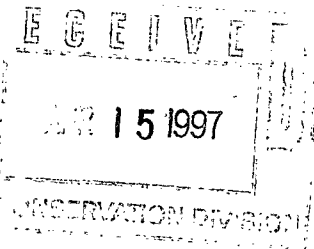
MARTYNE KIELING Martyne Kieling

C: FILE
DISTRICT OFFICE _____



**Enron
Transportation
& Storage**

*Services provided by Northern Natural Gas Company
and Transwestern Pipeline Company*



April 11, 1997

RECEIVED

APR 16 1997

Environmental Bureau
Oil Conservation Division

James R. Russell
Transwestern Pipeline Company
Summit Office Bld. Ste. 250
4001 Indian School Rd. NE
Albuquerque, New Mexico 87110

Mr. Roger Anderson
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

*Wait on
C-138
5-2-97*

Call Wayne

Re: Disposal of Concrete and Oil Stained Soil at Atoka 1 Compressor Station, Artesia, New Mexico

Dear Mr. Anderson

Transwestern Pipeline Company, owner and operator of the Atoka 1 Compressor Station request approval from your agency to dispose of waste generated from this location. This request addresses the disposal of approximately fifty (50) cubic yards of clean cement and approximately twenty (20) cubic yards of non hazardous oil stained soil removed from this location. See soil analytical. This waste will be disposed at Gandy's Commercial Land Farm permit # NM-711-1-0020 located near Tatum, New Mexico. Approval of this request will allow Transwestern to expedite completion of this project and will not create any adverse impact to the facility's environment.

If you should have any question, please call me at (505) 260-4011.

Sincerely,

James R. Russell

James R. Russell
Environmental Specialist

*Chain of Custody
Sample Rec'd by Lab
says at Ambient Temperature*

xc: Rich Jolly
Larry Campbell

MJ 5/6/97



Post-it® Fax Note	7871	Date	# of pages 2
To	Perry	From	Debby
Co./Dept.		Co.	
Phone #		Phone #	
Fax #		Fax #	

ANALYTICAL AND QUALITY CONTROL REPORT

Larry Campbell
 TRANSWESTERN PIPELINE
 6381 N. Main St.
 Roswell, NM 88202

04/08/1997

EPIC Job Number: 97.01191

Page 1

Project Description:
 Job Description: Atoka #1

Enclosed are the Analytical Results and Quality Control Data Reports for the following samples submitted to EPIC Laboratories, Inc. for analysis:

Sample Number	Sample Description	Date Taken	Time Taken	Date Received
330536	Soils Pie PT #2	03/31/1997	08:00	04/02/1997

This 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.

Debby Skogen
 Debby Skogen
 Project Coordinator

NOTE: Results apply only to the samples analyzed. Reproduction of this report is permitted only in its entirety.

1548 Valwood Parkway, Suite 118, Carrollton, Texas 75006
 2621 Ridgepoint Drive, Suite 135, Austin, Texas 78754
 13802 Placid Brook Court, Houston, Texas 77059

(972) 406-8100
 (512) 928-8905
 (281) 286-1400

Fax: (972) 484-2969
 Fax: (512) 928-3208
 Fax: (281) 256-2424

ANALYTICAL RESULTS REPORT

Larry Campbell
 TRANSWESTERN PIPELINE
 6381 N. Main St.
 Roswell, NM 88202

04/08/1997

EPIC Job Number: 97.01191
 Sample Number: 330536

Page 2

Project Description:
 Job Description: Atoka #1

Sample Description: Soils Pie PT #2

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
TCLP-8240										
TCLP-Benzene		<0.025	mg/L	S-8240A		04/07/1997	zsc		1180	0.025
TCLP-2-Butanone (MEK)		<0.50	mg/L	S-8240A		04/07/1997	zsc		1180	0.50
TCLP-Carbon Tetrachloride		<0.025	mg/L	S-8240A		04/07/1997	zsc		1180	0.025
TCLP-Chlorobenzene		<0.025	mg/L	S-8240A		04/07/1997	zsc		1180	0.025
TCLP-Chloroform		<0.025	mg/L	S-8240A		04/07/1997	zsc		1180	0.025
TCLP-1,2-Dichloroethane		<0.025	mg/L	S-8240A		04/07/1997	zsc		1180	0.025
TCLP-1,1-Dichloroethene		<0.025	mg/L	S-8240A		04/07/1997	zsc		1180	0.025
TCLP-Tetrachloroethene		<0.025	mg/L	S-8240A		04/07/1997	zsc		1180	0.025
TCLP-Trichloroethene		<0.025	mg/L	S-8240A		04/07/1997	zsc		1180	0.025
TCLP-Vinyl chloride		<0.05	mg/L	S-8240A		04/07/1997	zsc		1180	0.05
SURR: 1,2-Dichloroethane-d4	85		% Rec	S-8240A		04/07/1997	zsc		1180	78-114
SURR: Toluene-d8	97		% Rec	S-8240A		04/07/1997	zsc		1180	88-110
SURR: 4-Bromofluorobenzene	98		% Rec	S-8240A		04/07/1997	zsc		1180	86-115

17-7

31-7

2/4/97

7dys Need Chirino & Costly



Services provided by Northern Natural Gas Company
and Transwestern Pipeline Company

SOUTHWEST REGION
Summit Office Building, Suite 250
4001 Indian School Road, N.E.
Albuquerque, New Mexico 87110

Phone: (505) 260-4000

Fax: (505) 254-1437

To: Kieling

Fax Number: 505-827-8177

Date: 5-8-97

From:

☐ Arnie Bailey	☐ Rich Jolly
☐ Bob Bandel	☐ Tim Jones
☐ Tom Carlson	☐ Joe Lueras
☐ Terry Ervin	☐ Ronnie Morse
☐ Jon Hendricks	☒ James (Butch) Russell
☐ Carmelita Holland	☐ Kathy Santerre
☐ Trevor Davidson	☐ Rick Smith
☐ Todd Ingalls	

Comments:

Number of pages including this cover sheet: 3

Please call (505) 260- 4011 if you do not receive the following transmission in its entirety.



LABORATORIES, INC.

ANALYTICAL AND QUALITY CONTROL REPORT

Larry Campbell
TRANSWESTERN PIPELINE
6381 N. Main St.
Roswell, NM 88202

03/24/1997

EPIC Job Number: 97.00552

Page 1

Project Description:
Job Description: Atoka #1

Enclosed are the Analytical Results and Quality Control Data Reports for the following samples submitted to EPIC Laboratories, Inc. for analysis:

Sample Number	Sample Description	Date Taken	Time Taken	Date Received
328797	Atoka #1	02/17/1997	08:00	02/19/1997
328798	Atoka #1 (TPH)	02/17/1997	08:00	02/19/1997

This 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.

Debby Skogen

Debby Skogen
Project Coordinator

NOTE: Results apply only to the samples analyzed. Reproduction of this report is permitted only in its entirety.

ANALYTICAL RESULTS REPORT

Larry Campbell
TRANSWESTERN PIPELINE
6381 N. Main St.
Roswell, NM 88202

03/24/1997

EPIC Job Number: 97.00552
Sample Number: 328797

Page 2

Project Description:
Job Description: Atoka #1
Sample Description: Atoka #1

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
Cyanide, Reactive		<0.25	mg/kg	S-7.3.3.1		02/24/1997	kwo		496	0.25
pH, Corrosivity		8.53	units	S-7.2.2		02/24/1997	kwo		1401	N/A
Sulfide, Reactive		20	mg/kg	S-7.3.4.1		02/24/1997	kwo		519	12.5
TPH-418.1 (Nonaqueous)		2170	ug/g	E-418.1		02/26/1997	bsb		1278	10
TCLP-Arsenic, ICP		<0.03	mg/L	S-6010A	02/26/1997	03/05/1997	jmc	1201	1524	0.03
TCLP-Barium, ICP		0.81	mg/L	S-6010A	02/26/1997	03/05/1997	jmc	1201	1411	0.01
TCLP-Cadmium, ICP		<0.01	mg/L	S-6010A	02/26/1997	03/05/1997	jmc	1201	1586	0.01
TCLP-Chromium, ICP		<0.01	mg/L	S-6010A	02/26/1997	03/05/1997	jmc	1201	1585	0.01
TCLP-Lead, ICP		<0.03	mg/L	S-6010A	02/26/1997	03/05/1997	jmc	1201	1594	0.03
TCLP-Mercury, CVAA		<0.02	mg/L	S-7470A		02/26/1997	bwb		1337	0.02
TCLP-Selenium, ICP		<0.04	mg/L	S-6010A	02/26/1997	03/05/1997	jmc	1201	1523	0.04
TCLP-Silver, ICP		<0.01	mg/L	S-6010A	02/26/1997	03/10/1997	jmc	1201	1580	0.01
Ignitability	DNB	DNB		ASTM D4982-89		02/26/1997	bsb		311	
TCLP-ACID EXTRACTABLES - 8270					02/25/1997	OK				
TCLP-Cresols, Total		<0.066	mg/L	S-8270A		03/04/1997	dtw	435	420	0.066
TCLP-Pentachlorophenol		<0.33	mg/L	S-8270A		03/04/1997	dtw	435	420	0.33
TCLP-2,4,5-Trichlorophenol		<0.066	mg/L	S-8270A		03/04/1997	dtw	435	420	0.066
TCLP-2,4,6-Trichlorophenol		<0.066	mg/L	S-8270A		03/04/1997	dtw	435	420	0.066
SURR: 2-Fluorophenol		58	% Rec	S-8270A		03/04/1997	dtw	435	420	21-100
SURR: Phenol-d5		56	% Rec	S-8270A		03/04/1997	dtw	435	420	10-94
SURR: 2,4,6-Tribromophenol		68	% Rec	S-8270A		03/04/1997	dtw	435	420	10-123
TCLP-BASE NEUTRALS - 8270					02/25/1997	OK				
TCLP-1,4-Dichlorobenzene		<0.066	mg/L	S-8270A		03/04/1997	dtw	435	419	0.066
TCLP-2,4-Dinitrotoluene		<0.066	mg/L	S-8270A		03/04/1997	dtw	435	419	0.066
TCLP-Hexachlorobenzene		<0.066	mg/L	S-8270A		03/04/1997	dtw	435	419	0.066
TCLP-Hexachlorobutadiene		<0.066	mg/L	S-8270A		03/04/1997	dtw	435	419	0.066
TCLP-Hexachloroethane		<0.066	mg/L	S-8270A		03/04/1997	dtw	435	419	0.066
TCLP-Nitrobenzene		<0.066	mg/L	S-8270A		03/04/1997	dtw	435	419	0.066
TCLP-Pyridine		<0.066	mg/L	S-8270A		03/04/1997	dtw	435	419	0.066
URR: 2-Fluorobiphenyl		72	% Rec	S-8270A		03/04/1997	dtw	435	419	43-116
URR: Nitrobenzene-d5		72	% Rec	S-8270A		03/04/1997	dtw	435	419	35-114
URR: Terphenyl-d14		54	% Rec	S-8270A		03/04/1997	dtw	435	419	33-141

NB - Does not burn.

ANALYTICAL RESULTS REPORT

Larry Campbell
TRANSWESTERN PIPELINE
6381 N. Main St.
Roswell, NM 88202

03/24/1997

EPIC Job Number: 97.00552
Sample Number: 328798

Page 3

Project Description:
Job Description: Atoka #1

Sample Description: Atoka #1 (TPH)

Parameter	Flag	Result	Units	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch Number	Run Batch Number	Reporting Limit
TPH-418.1 (Nonaqueous)		179	ug/g	E-418.1		02/26/1997	bss		1278 10	9dys/14

QUALITY CONTROL REPORT BLANKS

Larry Campbell
TRANSWESTERN PIPELINE
6381 N. Main St.
Roswell, NM 88202

03/24/1997

EPIC Job Number: 97.00552

Project Description:

Job Description: Atoka #1

Parameter	Flag	Blank Result	Units	Reporting Limit	Date Analyzed	Prep Batch Number	Run Batch Number
Cyanide, Reactive		<0.25	mg/kg	0.25	02/24/1997		496
Sulfide, Reactive		<12.5	mg/kg	12.5	02/24/1997		519
TPH-418.1 (Nonaqueous)		<10	ug/g	10	02/24/1997		1278
TCLP-Arsenic, ICP		<0.03	mg/L	0.03	03/05/1997	1201	1524
TCLP-Barium, ICP		<0.01	mg/L	0.01	03/05/1997	1201	1411
TCLP-Cadmium, ICP		<0.01	mg/L	0.01	03/05/1997	1201	1586
TCLP-Chromium, ICP		<0.01	mg/L	0.01	03/05/1997	1201	1585
TCLP-Lead, ICP		<0.03	mg/L	0.03	03/05/1997	1201	1594
TCLP-Mercury, CVAA		<0.0002	mg/L	0.0002	02/26/1997		1337
TCLP-Selenium, ICP		<0.04	mg/L	0.04	03/05/1997	1201	1523
TCLP-Silver, ICP		<0.01	mg/L	0.01	03/05/1997	1201	1576
TCLP-ACID EXTRACTABLES - 8270							
TCLP-Cresols, Total		<0.066	mg/L	0.066	03/04/1997	435	420
TCLP-Pentachlorophenol		<0.33	mg/L	0.33	03/04/1997	435	420
TCLP-2,4,5-Trichlorophenol		<0.066	mg/L	0.066	03/04/1997	435	420
TCLP-2,4,6-Trichlorophenol		<0.066	mg/L	0.066	03/04/1997	435	420
TCLP-BASE NEUTRALS - 8270							
TCLP-1,4-Dichlorobenzene		<0.066	mg/L	0.066	03/04/1997	435	419
TCLP-2,4-Dinitrotoluene		<0.066	mg/L	0.066	03/04/1997	435	419
TCLP-Hexachlorobenzene		<0.066	mg/L	0.066	03/04/1997	435	419
TCLP-Hexachlorobutadiene		<0.066	mg/L	0.066	03/04/1997	435	419
TCLP-Hexachloroethane		<0.066	mg/L	0.066	03/04/1997	435	419
TCLP-Nitrobenzene		<0.066	mg/L	0.066	03/04/1997	435	419
TCLP-Pyridine		<0.066	mg/L	0.066	03/04/1997	435	419

All parameters should be less than the reporting limit.

QUALITY CONTROL REPORT CONTINUING CALIBRATION VERIFICATION STANDARD

Larry Campbell
TRANSWESTERN PIPELINE
6381 N. Main St.
Roswell, NM 88202

03/24/1997

EPIC Job Number: 97.00552

Project Description:
Job Description: Atoka #1

Parameter	Flag	CCVS True Concentration	Units	CCVS Concentration Found	CCVS Percent Recovery	Data Analyzed	Run Batch Number
Cyanide, Reactive		1.0	mg/kg	1.0	100.0	02/24/1997	496
Sulfide, Reactive		1000	mg/kg	1000	100.0	02/24/1997	519
TPH-419.1 (Nonaqueous)		104	ug/g	105	101.0	02/24/1997	1278
TCLP-Arsenic, ICP		1.00	mg/L	0.96	96.0	03/05/1997	1524
TCLP-Barium, ICP		1.00	mg/L	0.97	97.0	03/05/1997	1411
TCLP-Cadmium, ICP		1.00	mg/L	0.98	98.0	03/05/1997	1586
TCLP-Chromium, ICP		1.00	mg/L	1.00	100.0	03/05/1997	1585
TCLP-Lead, ICP		1.00	mg/L	0.96	96.0	03/05/1997	1594
TCLP-Mercury, CVAA		0.50	mg/L	0.50	100.0	02/26/1997	1337
TCLP-Selenium, ICP		1.00	mg/L	1.04	104.0	03/05/1997	1523
TCLP-Silver, ICP		1.00	mg/L	1.02	102.0	03/10/1997	1560
TCLP-ACID EXTRACTABLES - 8270							
TCLP-Cresols, Total		0.10	mg/L	0.095	95.0	03/04/1997	420
TCLP-Pentachlorophenol		0.050	mg/L	0.053	106.0	03/04/1997	420
TCLP-2,4,5-Trichlorophenol		0.050	mg/L	0.048	96.0	03/04/1997	420
TCLP-2,4,6-Trichlorophenol		0.050	mg/L	0.050	100.0	03/04/1997	420
TCLP-BASE NEUTRALS - 8270							
TCLP-1,4-Dichlorobenzene		0.050	mg/L	0.048	96.0	03/04/1997	419
TCLP-2,4-Dinitrotoluene		0.050	mg/L	0.051	102.0	03/04/1997	419
TCLP-Hexachlorobenzene		0.050	mg/L	0.052	104.0	03/04/1997	419
TCLP-Hexachlorobutadiene		0.050	mg/L	0.046	92.0	03/04/1997	419
TCLP-Hexachloroethane		0.050	mg/L	0.048	96.0	03/04/1997	419
TCLP-Nitrobenzene		0.050	mg/L	0.047	94.0	03/04/1997	419
TCLP-Pyridine		0.050	mg/L	0.020	40.0	03/04/1997	419

CCVS - Continuing Calibration Verification Standard

QUALITY CONTROL REPORT MATRIX SPIKE/MATRIX SPIKE DUPLICATE

Larry Campbell
TRANSWESTERN PIPELINE
6381 N. Main St.
Roswell, NM 88202

03/24/1997

EPIC Job Number: 97.00552

Project Description:
Job Description: Atoka #1

Parameter	Flag	Units	Sample Result	Spike Amount Added	Matrix Spike Result	MS Percent Recovery	Duplicate		MSD Percent Recovery	MS/MSD RPD	Date Analyzed	Prep Batch Number	Run Batch Number
							Spike Amount Added	MSD Result					
TPH-418.1 (Nonaqueous)		ug/g	42	250	308	106.4	250	277	94.0	12.3	02/24/1997		1278
TPH-418.1 (Nonaqueous)		ug/g	41	250	346	122.0	250	332	116.4	4.7	02/26/1997		1278
TCLP-Arsenic, ICP		mg/L	0.13	1.00	1.02	89.0	1.00	1.04	91.0	2.2	03/05/1997	1201	1524
TCLP-Barium, ICP		mg/L	0.12	1.00	0.93	81.0	1.00	0.93	81.0	0.0	03/05/1997	1201	1411
TCLP-Cadmium, ICP	MI	mg/L	0.01	1.00	0.69	68.0	1.00	0.60	59.0	14.2	03/05/1997	1201	1586
TCLP-Chromium, ICP		mg/L	0.02	1.00	0.78	76.0	1.00	0.78	76.0	0.0	03/05/1997	1201	1585
TCLP-Lead, ICP		mg/L	<0.03	1.00	0.78	78.0	1.00	0.78	78.0	0.0	03/05/1997	1201	1594
TCLP-Mercury, CVAA		mg/L	<0.0002	0.50	0.56	112.0	0.50	0.59	118.0	5.2	02/26/1997		1337
TCLP-Selenium, ICP	SSR	mg/L	4.1	1.00	6.20	210.0	1.00	6.30	220.0	4.7	03/05/1997	1201	1523
TCLP-Silver, ICP		mg/L	<0.01	1.00	1.01	101.0	1.00	1.01	101.0	0.0	03/10/1997		1580
TCLP-ACID EXTRACTABLES - 8270													
TCLP-Cresols, Total		mg/L	<0.066	0.10	0.117	39.0	0.10	0.121	40.3	3.3	03/04/1997	435	420
TCLP-Pentachlorophenol		mg/L	<0.33	0.10	0.033	33.0	0.10	0.031	31.0	6.3	03/04/1997	435	420
TCLP-2,4,5-Trichlorophenol		mg/L	<0.066	0.10	0.035	35.0	0.10	0.035	35.0	0.0	03/04/1997	435	420
TCLP-2,4,6-Trichlorophenol		mg/L	<0.066	0.10	0.041	41.0	0.10	0.041	41.0	0.0	03/04/1997	435	420
TCLP-BASE NEUTRALS - 8270													
TCLP-1,4-Dichlorobenzene		mg/L	<0.066	0.10	0.041	41.0	0.10	0.042	42.0	2.4	03/04/1997	435	419
TCLP-2,4-Dinitrotoluene		mg/L	<0.066	0.10	0.053	53.0	0.10	0.050	50.0	5.8	03/04/1997	435	419
TCLP-Hexachlorobenzene		mg/L	<0.066	0.10	0.052	52.0	0.10	0.051	51.0	1.9	03/04/1997	435	419
TCLP-Hexachlorobutadiene		mg/L	<0.066	0.10	0.037	37.0	0.10	0.038	38.0	2.7	03/04/1997	435	419
TCLP-Hexachloroethane		mg/L	<0.066	0.10	0.047	47.0	0.10	0.046	46.0	2.2	03/04/1997	435	419
TCLP-Nitrobenzene		mg/L	<0.066	0.10	0.043	43.0	0.10	0.044	44.0	2.3	03/04/1997	435	419
TCLP-Pyridine		mg/L	<0.066	0.10	0.047	47.0	0.10	0.035	35.0	29.3	03/04/1997	435	419

NOTE: The Quality Control data in this report reflects the batch in which your sample was prepped and/or analyzed.
The sample selected for QA may not necessarily be your sample.

I - MS/MSD outside limits - matrix interference suspected, refer to LCS.
SR - The sample was >4x level of spike, skewed recoveries exist.

QUALITY CONTROL REPORT DUPLICATES

Larry Campbell
TRANSWESTERN PIPELINE
6381 N. Main St.
Roswell, NM 88202

03/24/1997

EPIC Job Number: 97.00552

Project Description:
Job Description: Atoka #1

Parameter	Flag	Units	Sample Result	Duplicate Sample Result	RPD	Date Analyzed	Prep Batch Number	Run Batch Number
pH, Corrosivity	RHT	units	7.89	7.90	0.1	02/24/1997		1401

RHT - Received out of holding time.

QUALITY CONTROL REPORT LABORATORY CONTROL STANDARD

Larry Campbell
TRANSWESTERN PIPELINE
6381 N. Main St.
Roswell, NM 88202

03/24/1997

EPIC Job Number: 97.00552

Project Description:
Job Description: Atoka #1

Analyte	Prep Batch No.	Run Batch No.	LCS True Conc	Units	LCS Conc Found	LCS % Rec.	LCS Dup Conc. Found	LCS Dup % Rec	LCS RPD	Flag	Date Analyzed
Cyanide, Reactive		496	1000	mg/kg	379	37.9					02/24/1997
pH, Corrosivity		1401	9.18	units	8.97	97.7					02/24/1997
Sulfide, Reactive		519	1000	mg/kg	960	96.0					02/24/1997
TPH-418.1 (Nonaqueous)		1278	2660	ug/g	2236	84.1					02/24/1997
TCLP-Arsenic, ICP	1201	1524	1.00	mg/L	1.00	100.0					03/10/1997
TCLP-Barium, ICP	1201	1411	1.00	mg/L	0.98	98.0					03/10/1997
TCLP-Cadmium, ICP	1201	1586	1.00	mg/L	1.02	102.0					03/10/1997
TCLP-Chromium, ICP	1201	1585	1.00	mg/L	1.01	101.0					03/10/1997
TCLP-Lead, ICP	1201	1594	1.00	mg/L	1.02	102.0					03/10/1997
TCLP-Mercury, CVAA		1337	0.50	mg/L	0.49	98.0					02/26/1997
TCLP-Selenium, ICP	1201	1523	1.00	mg/L	0.97	97.0					03/10/1997
TCLP-ACID EXTRACTABLES - 8270											
TCLP-Cresols, Total	435	420	0.30	mg/L	0.140	46.7					03/04/1997
TCLP-Pentachlorophenol	435	420	0.10	mg/L	0.047	47.0					03/04/1997
TCLP-2,4,5-Trichlorophenol	435	420	0.10	mg/L	0.042	42.0					03/04/1997
TCLP-2,4,6-Trichlorophenol	435	420	0.10	mg/L	0.049	49.0					03/04/1997
TCLP-BASE NEUTRALS - 8270											
TCLP-1,4-Dichlorobenzene	435	419	0.10	mg/L	0.047	47.0					03/04/1997
TCLP-2,4-Dinitrotoluene	435	419	0.10	mg/L	0.061	61.0					03/04/1997
TCLP-Hexachlorobenzene	435	419	0.10	mg/L	0.062	62.0					03/04/1997
TCLP-Hexachlorobutadiene	435	419	0.10	mg/L	0.041	41.0					03/04/1997
TCLP-Hexachlorocyclohexane	435	419	0.10	mg/L	0.041	41.0					03/04/1997
TCLP-Nitrobenzene	435	419	0.10	mg/L	0.054	54.0					03/04/1997
TCLP-Pyridine	435	419	0.10	mg/L	0.047	47.0					03/04/1997

LCS - Laboratory Control Standard

For samples with insufficient sample volume, an LCS/LCS duplicate is reported instead of an MS/MSD.

SPIKES

Larry Campbell
TRANSWESTERN PIPELINE
6381 N. Main St.
Roswell, NM 88202

03/24/1997

EPIC Job Number: 97.00552

Project Description:
Job Description: Atoka #1

Parameter	Flag	Date Analyzed	Units	Prep Batch Number	Run Batch Number	Spiked Sample Result	Sample Result	Spike Amount	Percent Recovery
Cyanide, Reactive		02/24/1997	mg/kg		496	298	<0.25	1000	29.8
Sulfide, Reactive		02/24/1997	mg/kg		519	240	<12.5	250	96.0

Advisory Control Limits for Percent Recovery are 85-115%.



1548 VALWOOD PARKWAY, SUITE 118
CARROLLTON, TEXAS 75006
DALLAS (972) 406-8100
AUSTIN (512) 928-8905

CHAIN OF CUSTODY RECORD

COMPANY Trans Western Pipeline
ADDRESS Rowell Wm 88201
PHONE 505-625-8022 FAX
PROJECT NAME/LOCATION AtoKa #1
PROJECT NUMBER
PROJECT MANAGER

SAMPLED BY Larry Gandy
(PRINT NAME)
SIGNATURE Larry Gandy
(PRINT NAME)
SIGNATURE Larry Gandy

PROJECT MANAGER

SIGNATURE Larry Gandy
(PRINT NAME)
SIGNATURE

and Type of
Container

MATRIX
GRAB
COMP
HCl
NaOH
HNO₃
H₂SO₄
OTHER

SAMPLE DESCRIPTION

DATE TIME

2-17 8 AM Soils AtoKa #1
2-17 8 AM Soils AtoKa #1

ANALYSES

X TPH
X TCEP metals
X TCEP Semi-Volatiles
X TCEP Volatiles
X RCI

COMMENTS

To assist us in selecting the proper method

Is this work being conducted for regulatory compliance monitoring? Yes ☐ No ☐

Is this work being conducted for regulatory enforcement action? Yes ☐ No ☐

Which regulations apply: RCRA ☐ NPDES Wastewater ☐
UST ☐ Drinking Water ☐
Other ☐ None ☐

REPORT TO: Larry Gandy
INVOICE TO:
P.O. NO.
EPIC QUOTE NO.

CONDITION OF SAMPLE: BOTTLES INTACT? YES / NO
FIELD FILTERED? YES / NO

SAMPLE REMAINDER DISPOSAL: RETURN SAMPLE REMAINDER TO CLIENT VIA
REQUEST EPIC TO DISPOSE OF ALL SAMPLE REMAINDERS

RELINQUISHED BY: Larry Gandy DATE 2-17 TIME 9 AM

RELINQUISHED BY:

DATE

TIME

RECEIVED FOR EPIC BY: Barbara Walker

COC SEALS PRESENT AND INTACT? YES / NO
VOLATILES FREE OF HEADSPACE? YES / NO

TEMPERATURE UPON RECEIPT: Unk
Bottles supplied by EPIC? YES / NO

DATE

METHOD OF SHIPMENT

REMARKS:

Fax copy to 505-398-1887

P.O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
511 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

NEW MEXICO
Energy Minerals and Natural Resources Department

Oil Conservation Division

2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 8/8/95

Submit Original
Plus 1 Copy
to appropriate
District Office

70 MARLYN KIBLER'S

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator D & L Meters
Verbal Approval Received: Yes ☐ No ☒	5. Originating Site 710s. commercial Lovington N.M.
2. Management Facility Destination Gandy Marley Inc	6. Transporter Gandy Corp.
3. Address of Facility Operator box 1658 Roswell N.M. 88202	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 710 S. Commercial	Lovington N.M.
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.	
All transporters must certify the wastes delivered are only those consigned for transport.	

RECEIVED

JUN 13 1997

BRIEF DESCRIPTION OF MATERIAL:

Environmental Bureau
Oil Conservation Division

Wash Bay liquids and solids from cleaning exempt blow out preventers and related equipment.

HOLD FOR ANALYTICAL ON WATER! OK CHECKED WITH LAB!

THIS MATERIAL (LQ) WILL BE SOLIDIFIED AT LANDFARM! IF PERMIT ALLOWS?

OLD HOBBS OFFICE

JUN 5 1997

RECEIVED

NO BLANKET APPROVALS

MUST SUBMIT C-138 FOR EACH DISPOSAL EVENT! LARRY GANDY

Estimated Volume 100 bbls. per mo. Known Volume (to be entered by the operator at the end of the haul) cy

SIGNATURE: Larry Gandy TITLE: foreman DATE: 6-2-97
Waste Management Facility/Authorized Agent
TYPE OR PRINT NAME: Larry Gandy TELEPHONE NO. 398-4960

(This space for State Use)

APPROVED BY: [Signature] TITLE: ENVR ENGR DATE: 6/6/97

APPROVED BY: [Signature] TITLE: Environmental Geologist DATE: 6/13/97

Printed in Hobbs 6/18/97

Gandy Marley Inc.

TATUM, NEW MEXICO 88267

ROSWELL, NEW MEXICO

CERTIFICATE OF WASTE STATUS

OILFIELD EXEMPT WASTE MATERIAL

Originating Location: 210 S. Commercial
Los Alamos, NM 88260

Source: Sump

Disposal Location: 34 miles West of Tatum

"As a condition of acceptance for disposal, I hereby certify that this waste is an exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 261.3 (b)."

I, the undersigned as the agent for D & L Meters
concur with the status of the waste from the subject site.

Name Kenneth L. Wallace

Title/Agency PRESIDENT

D & L METERS

Address P.O. Box 1621

Signature Kenneth L. Wallace

Date 5-13-97

OLD HUBBS
OFFICE

JUN 5 1997

RECEIVED

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

**ANALYTICAL RESULTS FOR
SAFETY FIRST**
Attention: D. G. Williamson
333 W. Comanche
Hobbs, NM 88240

April 9, 1997
Receiving Date: 03/27/97
Sample Type: Sludge
Project No: D & L
Project Location: NA

Extraction Date: 03/31/97
Analysis Date: 04/01/97
Sampling Date: 03/26/97
Sample Condition: I & C
Sample Received by: JH
Project Name: Sump

TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T69977 3715	QC	RPD	%EA	%IA
Vinyl chloride	0.2	0.05	ND	0.099	1	98	99
1,1-Dichloroethene	0.7	0.05	ND	0.097	4	115	97
Methyl Ethyl Ketone	200.0	0.05	ND	0.082	3	90	82
Chloroform	6.0	0.05	ND	0.094	3	110	94
1,2-Dichloroethane	0.5	0.05	ND	0.094	3	103	94
Benzene	0.5	0.05	ND	0.094	3	107	94
Carbon Tetrachloride	0.5	0.05	ND	0.095	2	119	95
Trichloroethene	0.5	0.05	ND	0.094	2	110	94
Tetrachloroethene	0.7	0.05	ND	0.094	4	115	94
Chlorobenzene	100.0	0.05	ND	0.095	3	107	95
1,4-Dichlorobenzene	7.5	0.05	ND	0.098	3	104	98

SURROGATES	% Recovery
Dibromofluoromethane	98
Toluene-d8	100
4-Bromofluorobenzene	100

ND = Not Detected

METHODS: EPA SW 846-1311, 8260.
CHEMIST: RP



Director, Dr. Blair Leftwich




4-9-97

DATE


TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

**ANALYTICAL RESULTS FOR
SAFETY FIRST**
Attention: D. G. Williamson
333 W. Comanche
Hobbs, NM 88240

April 9, 1997
Receiving Date: 03/27/97
Sample Type: Sludge
Project No: D & L
Project Location: NA

Extraction Date: 04/02/97
Analysis Date: 04/03/97
Sampling Date: 03/26/97
Sample Condition: I & C
Sample Received by: JH
Project Name: Sump

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit *	T69977 3715	QC	RPD	%EA	%IA
Pyridine	5.0	1.0	ND	75	6	18	94
1,4-Dichlorobenzene	7.5	1.0	ND	78	7	39	98
o-Cresol	200.0	1.0	ND	78	19	51	98
m,p-Cresol	200.0	1.0	ND	74	23	50	93
Total Cresol	200.0	1.0	ND	---	---	---	---
Hexachloroethane	3.0	1.0	ND	75	7	42	94
Nitrobenzene	2.0	1.0	ND	74	3	47	93
Hexachlorobutadiene	0.5	1.0	ND	77	3	42	96
2,4,6-Trichlorophenol	2.0	5.0	ND	77	3	46	96
2,4,5-Trichlorophenol	400.0	5.0	ND	78	3	51	98
2,4-Dinitrotoluene	0.13	1.0	ND	81	2	61	101
2,4-D	10.0	5.0	ND	81	3	52	101
Hexachlorobenzene	0.13	1.0	ND	80	8	84	100
2,4,5-TP	1.0	5.0	ND	77	6	45	96
Pentachlorophenol	100.0	5.0	ND	75	8	74	94
Chlordane	0.03	0.1	ND	0.054	5	86	108
Toxaphene	0.5	0.5	ND	2.00	6	92	100
Lindane	0.4	0.1	ND	0.027	5	74	108
Heptachlor	0.008	0.1	ND	0.026	5	74	104
Heptachlor epoxide	0.008	0.1	ND	0.0285	5	78	110
Total Heptachlor	0.008	0.1	ND	---	---	---	---
Endrin	0.02	0.1	ND	0.049	8	71	98
Methoxychlor	10.0	10	ND	0.26	5	74	104
Surrogates	% RECOVERY						
2-Fluorophenol	100						
Phenol-d6	115						
Nitrobenzene-d5	105						
2-Fluorobiphenyl	113						
2,4,6-Tribromophenol	88						
Terphenyl-d14	108						

*NOTE: Elevated reporting limits due to sample matrix.
Methods: EPA SW 846-1311, 8270.
CHEMIST: HC/CC/MB
ND - Not Detected

Director, Dr. Blair Leftwich

DATE

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

OLD MAN
OFFICE
JUN 1 1997
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4-9-97



TRACE ANALYSIS, INC.

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

ANALYTICAL RESULTS FOR

SAFETY FIRST

Attention: D. G. Williamson

333 W. Comanche

Hobbs, NM 88240

April 9, 1997

Receiving Date: 03/27/97

Sample Type: Sludge

Project No: D & L

Project Location: NA

Prep Date: 04/01/97

Analysis Date: 04/01/97

Sampling Date: 03/26/97

Sample Condition: Intact & Cool

Sample Received by: JH

Project Name: Sump

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	FLASHPOINT (F)
	EPA LIMIT =		500	250	---	<2 >12.5	140 F
T69977	3715	Non-reactive	<10	<2.5	Non-corrosive	6.6	>150
QC	Quality Control	---	---	---	---	7.0	---
RPD	% Extraction Accuracy	0	0	0	0	0	0
	% Instrument Accuracy	---	---	---	---	---	---

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JUN 5 1997
OFFICE

METHODS: EPA SW 846-2.1.3, 2.1.2, 1010.
CHEMIST: JT

RB

4-9-97

Director, Dr. Blair Leftwich

DATE

07777

458

TraceAnalysis, Inc.

6701 Aberdeen Avenue Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: <i>D. C. Williams</i>										ANALYSIS REQUEST										SPECIAL HANDLING														
Company Name & Address: <i>Safety First 333 W. Comanche Hobbs, NM 88240</i>										Total Metals Ag As Ba Cd Cr Pb Hg Se TCLP Metals Ag As Ba Cd Cr Pb Hg Se TCLP Volatiles TCLP Semi Volatiles RCI 8240 / 8260 8270										Turn around # of days Fax ASAP Hold														
Project #: <i>07777</i>										Project Name: <i>Sample</i>																								
Project Location: <i>333 W. Comanche Hobbs, NM 88240</i>										Sampler Signature: <i>[Signature]</i>																								
LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX				PRESERVATIVE METHOD				SAMPLING		DATE	TIME	BTEX, MTBE	TPH	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	8240 / 8260	8270	Turn around # of days	Fax ASAP	Hold							
				WATER	SOIL	AIR	SLUDGE	HCL	HNO3	ICE	NONE	DATE	TIME																					
69977	375	2																																
RECEIVED JUN 5 1997 3/26/97 10:30 AM															Received by: <i>Bus</i>										Received by: <i>[Signature]</i>									
															Date: 3/26/97 Time: 10:30 AM										Date: 3/27/97 Time: 9:00 AM									
															Relinquished by: <i>[Signature]</i>										Relinquished by: <i>[Signature]</i>									
Relinquished by: <i>[Signature]</i>															Relinquished by: <i>[Signature]</i>										Relinquished by: <i>[Signature]</i>									

*both #s
on 1st
service*

F 9-9-97

20 11



TRACE ANALYSIS, INC.

6701 Aberdeen Avenue

Lubbock, Texas 79424

806 • 794 • 1291

FAX 806 • 794 • 1298

ANALYTICAL RESULTS FOR GANDY CORP.

Attention: Larry Gandy
Box 827
Tatum, NM 88267

May 9, 1997
Receiving Date: 04/30/97
Sample Type: Water
Project No: GC 4-28
Project Location: Lovington Yard

Extraction Date: 05/01/97
Analysis Date: 05/09/97
Sampling Date: 04/28/97
Sample Condition: I & C
Sample Received by: JH
Project Name: D & L Meter

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cd	Cr	Pb	Ag	Ba	Hg
EPA LIMIT =									
T72580	D & L Meter	5.0	1.0	1.0	5.0	5.0	5.0	100.0	0.20
QC	Quality Control	<0.10	<0.10	<0.02	<0.05	<0.10	<0.05	<0.20	<0.01
		0.98	1.02	1.01	1.0	1.02	1.05	1.01	0.0048
Reporting Limit									
		0.10	0.10	0.02	0.05	0.10	0.05	0.20	0.01
RPD									
	% Extraction Accuracy	2	2	3	2	2	6	2	1
	% Instrument Accuracy	98	87	101	90	89	97	101	110
		98	102	101	100	102	105	20	96

RECEIVED
JUN 10 1997

CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba; RR Hg; RC
METHODS: EPA SW 846-1311, 6010, 7470.
TCLP METALS SPIKE: 2.0 mg/L As, Cd, Pb; 1.5 mg/L Se, Cr, Ag, Ba; 0.05 mg/L Hg.
TCLP METALS QC: 1.0 mg/L As, Se, Cd, Cr, Pb, Ba, Ag; 0.005 mg/L Hg.

Director, Dr. Blair Leftwich

5/9/97
Date

550

6701 Aberdeen Avenue Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298
1 (800) 378 1296

FAX #: 505-398-6887

Gandy Corp. Box 827 - Tatum nm 88267

GC 4-28

A meter

Loving ton 1/2 and.

Sampler Signature:

Law to Gov to

[illegible]

RECEIVED

Date:	Time:
-------	-------

11

Date: / Time:

Additional source of Dilution

~~F 5-947 904~~

5-12-97

1201

Roger Anderson

From: Wayne Price

Sent: Friday, December 27, 1996 9:25 AM

To: Tim Gumm; Jerry Sexton; Roger Anderson

Subject: BJ-Unichem Chemical Spill in Roswell NM

RE: BJ- Unichem Spill approx. 7:30 pm Dec. 26, 1996.

Subject: Emergency approval has been granted from NMOCD to GMI to allow BJ-Unichem to haul approximately 10 yards of contaminated soil to GMI landfarm.

Unichem released approximately 15 gal's. of product 8001 from a leaking tote tank on to the ground behind Price's Truck Stop located in Roswell, NM.

Conditions of Approval:

Contaminated soil to be isolated at the GMI landfarm until a Hazardous Waste determination is made by Unichem. If non-hazardous then GMI to submit C-138 to NMOCD for processing. If material is Hazardous then BJ-Unichem/GMI to contact the NMED-HWRMB.

BJ-Unichem to file subsequent spill report with the NMOCD-Artesia office per rule 116.

CC: Bill Marley-GMI ; Jay Miller-BJ-Unichem

MJK 5/6/97
File GMI

District I - (505) 393-6161
P.O. Box 1590
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 8/8/95

Submit Original
Plus 1 Copy
to appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ <i>BY W PRICE</i>	4. Generator Unichem div. of BJ
Verbal Approval Received: Yes ☒ No ☒	5. Originating Site Roswell trk stop
2. Management Facility Destination Gandy Marley Inc.	6. Transporter Armstrong
3. Address of Facility Operator 44mi. east of Roswell	8. State N.M.
7. Location of Material (Street Address or ULSTR) stafed at landfarm	
9. <u>Circle One</u> : A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

RECEIVED

BRIEF DESCRIPTION OF MATERIAL:

Contaminated soil from chemical truck spill.

MATERIAL MOVED TO GMI UNDER
EMERGENCY RESPONSE CONDITIONS;
CONFIRMING PAPER WORK! *JS*

MAR 24 1997

Environmental Bureau
Oil Conservation Division

OLD HOBBS
OFFICE

MAR 18 1997

RECEIVED

Estimated Volume 8 cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Larry Gandy TITLE: foreman DATE: 3-10-97
Waste Management Facility Authorized Agent
TYPE OR PRINT NAME: Larry Gandy TELEPHONE NO. 505-398-4960

(This space for State Use)

APPROVED BY: [Signature] TITLE: ENVN Engr DATE: 3/18/97

APPROVED BY: [Signature] TITLE: Baron Chief DATE: 3/24/97

Printed in Hobbs 3/25/97

ANDY MARLEY, INC.
P. O. BOX 827
TATUM, NEW MEXICO 88267
TATUM, NEW MEXICO ROSWELL, NEW MEXICO

CERTIFICATE OF WASTE STATUS
OILFIELD NON-EXEMPT WASTE MATERIAL

Originating Location: Roswell Truck Stop

Source: Contaminated soil from chemical truck spill

Disposal Location: 44 miles East of Roswell, NM

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for Unichem, A Division of BJ Services Company, U.S.A. concur with the status of the waste from the subject site.

Name Pamela J. Moose

Title/Agency Environmental Compliance Coordinator

Unichem, A Division of BJ Services Company, U.S.A.

Address P.O. Box 1499; 707 N. Leech

Hobbs, NM 88240

Signature

Pamela J. Moose

Date March 10, 1997

NO MORE
OPTION
MAR 14 1997
RECEIVED



TRACE ANALYSIS, INC.

6701 Aberdeen Avenue
Cubbock, Texas 79424

806-794-1296

FAX 806-794-1298

ANALYTICAL RESULTS FOR
GANDY MARLEY, INC.
Attention: Larry Gandy
Box 1658
Roswell, NM 88202

Prep Date: 02/05/97
Analysis Date: 02/05/97
Sampling Date: 01/27/97
Sample Condition: Intact
Sample Received by: JH
Project Name: Unichem

February 17, 1997
Receiving Date: 01/28/97
Sample Type: Soil
Project No: NA
Project Location: Roswell Spill

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	IGNITABILITY
EPA LIMIT =		---	500	250	---	<2 >12.5	---
T66425	(Roswell)	Non-reactive	<10	<2.5	Non-corrosive	6.6	Nonignitable
QC	Quality Control	---	---	---	---	7.0	---

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CUBBUCK
OFFICE

RPD
% Extraction Accuracy
% Instrument Accuracy

0	0	0	0
---	---	---	---
---	---	---	---

METHODS: EPA SW 846-2.1.1.3, 2.1.2, 2.1.1.1.
CHEMIST: JT

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

2-17-97
DATE

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue
Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

ANALYTICAL RESULTS FOR
GANDY MARLEY, INC.

Attention: Larry Gandy
Box 1658

Roswell, NM 88202

Extraction Date: 01/30/97
Analysis Date: 01/31/97
Sampling Date: 01/27/97
Sample Condition: Intact
Sample Received by: JH
Project Name: Unichem

February 17, 1997
Receiving Date: 01/28/97
Sample Type: Soil
Project No: NA
Project Location: Roswell Spill

TCLP METALS (mg/L)

Ta#	Field Code	As	Se	Cd	Cr	Pb	Ag	Ba	Hg
EPA LIMIT =									
T66425	(Roswell)	5.0	1.0	1.0	5.0	5.0	5.0	100.0	0.20
QC	Quality Control	<0.10	<0.10	<0.05	0.14	<0.10	<1.0	0.50	<0.01
		5.3	5.3	5.3	5.4	5.1	1.1	5.4	0.0048
Reporting Limit									
		0.10	0.10	0.02	0.05	0.50	0.50	0.20	0.01
RPD									
% Extraction Accuracy		0	1	1	1	1	0	1	0
% Instrument Accuracy		90	115	105	110	105	100	120	105
		106	106	106	108	102	110	108	98

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CLL TMS
OFFICE

CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba: RR
METHODS: EPA SW 846-1311, 6010, 7470.
TCLP METALS SPIKE: 2.0 mg/L As, Se, Cd, Cr, Pb, Ba; 1.0 mg/L Ag; 0.05 mg/L Hg.
TCLP METALS QC: 5.0 mg/L As, Se, Cd, Cr, Pb, Ba; 1.0 mg/L Ag; 0.005 mg/L Hg.

2-17-97

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

Date

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

ANALYTICAL RESULTS FOR
GANDY MARLEY, INC.
Attention: Larry Gandy
Box 1658
Roswell, NM 88202

February 17, 1997
Receiving Date: 01/28/97
Sample Type: Soil
Project No: NA
Project Location: Roswell Spill

Extraction Date: 01/29/97
Analysis Date: 02/03/97
Sampling Date: 01/27/97
Sample Condition: Intact
Sample Received by: JH
Project Name: Unichem

TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T66425 (Roswell)	QC	RPD	%EA	%IA
Vinyl chloride	0.2	0.05	ND	0.101	10	102	101
1,1-Dichloroethene	0.7	0.05	ND	0.091	12	100	91
Methyl Ethyl Ketone	200.0	0.5	ND	0.095	0	102	95
Chloroform	6.0	0.05	ND	0.093	11	112	93
1,2-Dichloroethane	0.5	0.05	ND	0.092	14	117	92
Benzene	0.5	0.05	ND	0.091	11	102	91
Carbon Tetrachloride	0.5	0.05	ND	0.092	10	107	92
Trichloroethene	0.5	0.05	ND	0.093	10	101	93
Tetrachloroethene	0.7	0.05	ND	0.093	7	104	93
Chlorobenzene	100.0	0.05	ND	0.092	9	104	92
1,4-Dichlorobenzene	7.5	0.05	ND	0.091	9	96	91

SURROGATES	% Recovery
Dibromofluoromethane	96
Toluene-d8	100
4-Bromofluorobenzene	93

ND = Not Detected

METHODS: EPA SW 846-1311, 8260.

CHEMIST: RP

BS

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

OLD HUBB
OFFICE

MAR 14 1997

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2-17-97

DATE

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

**ANALYTICAL RESULTS FOR
GANDY MARLEY, INC.**

Attention: Larry Gandy
Box 1658
Roswell, NM 88202

February 17, 1997

Receiving Date: 01/28/97

Sample Type: Soil

Project No: NA

Project Location: Roswell Spill

Extraction Date: 01/28/97

Analysis Date: 01/29/97

Sampling Date: 01/27/97

Sample Condition: Intact

Sample Received by: JH

Project Name: Unichem

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T66425 (Roswell)	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	72	17	38	90
1,4-Dichlorobenzene	7.5	0.05	ND	78	5	36	98
o-Cresol	200.0	0.05	ND	75	7	37	94
m,p-Cresol	200.0	0.05	ND	72	7	35	90
Total Cresol	200.0	0.05	ND	---	---	---	---
Hexachloroethane	3.0	0.05	ND	73	5	45	91
Nitrobenzene	2.0	0.05	ND	77	5	46	96
Hexachlorobutadiene	0.5	0.05	ND	89	3	43	111
2,4,6-Trichlorophenol*	2.0	0.05	ND	88	8	47	110
2,4,5-Trichlorophenol*	400.0	0.05	ND	78	10	58	98
2,4-Dinitrotoluene*	0.13	0.05	ND	79	10	64	99
2,4-D*	10.0	0.05	ND	88	13	69	110
Hexachlorobenzene	0.13	0.05	ND	84	6	81	105
2,4,5-TP	1.0	0.05	ND	81	13	80	101
Pentachlorophenol	100.0	0.05	ND	78	7	78	98
Chlordane	0.03	0.001	ND	---	5	74	100
Toxaphene	0.5	0.05	ND	---	2	92	109
Lindane	0.4	0.001	ND	---	15	82	104
Heptachlor	0.008	0.001	ND	---	6	70	100
Heptachlor epoxide	0.008	0.001	ND	---	6	70	100
Total Heptachlor	0.008	0.001	ND	---	---	---	---
Endrin	0.02	0.001	ND	---	5	81	108
Methoxychlor	10.0	0.1	ND	---	5	74	94
Surrogates	% RECOVERY						
2-Fluorophenol	26						
Phenol-d6	22						
Nitrobenzene-d5	55						
2-Fluorobiphenyl	52						
2,4,6-Tribromophenol	74						
Terphenyl-d14	106						

Methods: EPA SW 846-1311, 8270, 8080.

CHEMIST: RD/CC/MB

ND - Not Detected

OLD RUBBER
OFFICE

MAR 14 1997

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2-17-97

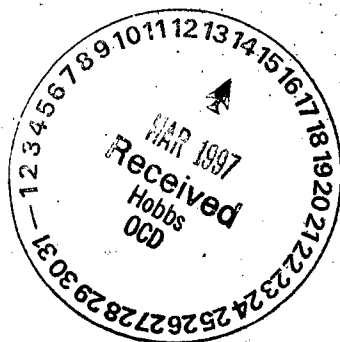
Director, Dr. Blair Leftwich

Director, Dr. Bruce McDonell

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

DATE



istrict I - (505) 393-6161
O. Box 1980
obbs, NM 88241-1980
istrict II - (505) 748-1283
11 S. First
rtesia, NM 88210
istrict III - (505) 334-6178
000 Rio Brazos Road
ztec, NM 87410
istrict IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 8/8/95

Submit Original
Plus 1 Copy
to appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator <u>Koch Oil Co.</u>
Verbal Approval Received: Yes ☐ No ☒	5. Originating Site <u>S-12 T-165 R-35E</u>
2. Management Facility Destination <u>GANDY MARLEY, INC.</u>	6. Transporter <u>VALLEY CONSTRUCTION</u>
3. Address of Facility Operator <u>ROS WELL, NEW MEXICO</u>	8. State <u>NEW MEXICO</u>
7. Location of Material (Street Address or ULSTR) <u>TOWNSEND STATION</u>	<u>S-12, T-165, R-35E</u>
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

CONTAMINATION CAUSED FROM YEARS OF BAD BUSINESS
DECISIONS. LEAKS IN TRANSFER PUMP AND REPAIRS MADE
TO LACTI UNIT, THERE WERE ALSO ACCIDENTAL
SPILLS OF CRUDE OIL BY VARIOUS PERSONELL

OLD HOBBS
OFFICE

NOV 13

RECEIVED

Estimated Volume 40 cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Bill Marley
Waste Management Facility Authorized Agent

TITLE: Vice-President DATE: 11-16-96

TYPE OR PRINT NAME: BILL MARLEY

TELEPHONE NO. 505-398-4960

(This space for State Use)

APPROVED BY: [Signature]

TITLE: ENGR ENGR

DATE: 11/13/96

APPROVED BY: [Signature]

TITLE: Bureau Chief

DATE: 11/18/96

Printed in Hobbs 11/18/96

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

ORIGINATING LOCATION: TOWNSEND STATION

SOURCE: Purchased oil from crude leases

DISPOSAL LOCATION: Gandy / Marley Landfarm

As a condition of acceptance for disposal. I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's [EPA] July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 261.3[b]".

I, the undersigned as the agent for Koch Pipeline Co., T.P. concur with the status of the waste from the subject site.

NAME: Paul L. Holland

TITLE / AGENCY: Team-Leader Koch Oil Company

ADDRESS: P.O. Box 1200 - Hobbs, NM 88240

SIGNATURE: Paul L. Holland

DATE: Nov 6, 1996

**OLD HUBBS
OFFICE**

NOV 13 1996

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TRACE ANALYSIS, INC.

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

ANALYTICAL RESULTS FOR

KOCH PIPELINE

Attention: Dennis Wilks

2121 French Dr.

Hobbs, NM 88240

September 16, 1996

Receiving Date: 09/04/96

Sample Type: Soil

Project No: NA

Project Location: Townsend Station

Prep Date: 09/06/96

Analysis Date: 09/06/96

Sampling Date: 09/03/96

Sample Condition: Intact & Cool

Sample Received by: ML

Project Name: NA

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	IGNITABILITY
-----	------------	------------	-------------------	-------------------	-------------	--------------	--------------

EPA LIMIT =		---	500	250	---	<2 >12.5	---
T58385	Soil Sample	Non-reactive	<10	<2.5	Non-corrosive	6.8	Nonignitable
QC	Quality Control	---	---	---	---	7.0	---

RPD

% Extraction Accuracy

% Instrument Accuracy

0

0

0

0

0

0

METHODS: EPA SW 846-2.1.1.3, 2.1.2, 2.1.1.1.

CHEMIST: JT

JS

9-16-96

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonnell

DATE

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NOV 13 1996
HOBBS
OFFICE

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

ANALYTICAL RESULTS FOR

KOCH PIPELINE

Attention: Dennis Wilks

2121 French Dr.

Hobbs, NM 88240

September 16, 1996

Receiving Date: 09/04/96

Sample Type: Soil

Project No: NA

Project Location: Townsend Station

Extraction Date: 09/06/96

Analysis Date: 09/09/96

Sampling Date: 09/03/96

Sample Condition: Intact & Cool

Sample Received by: ML

Project Name: NA

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cd	Cr	Pb	Ag	Ba	Hg
	EPA LIMIT =	5.0	1.0	1.0	5.0	5.0	5.0	100.0	0.20
T58385	Soil Sample	<0.1	<0.1	<0.02	0.44	<0.1	<0.01	1.8	<0.01
QC	Quality Control	5.22	5.15	0.13	0.51	1.24	0.13	4.9	0.0050

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NOV 13 1996
HOBBS OFFICE

Reporting Limit

RPD
% Extraction Accuracy
% Instrument Accuracy

7	3	1	1	1	1	1	0	3	0
98	100	110	90	105	105	105	98	100	114
104	103	102	103	99	99	99	107	98	100

CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba: RR

METHODS: EPA SW 846-1311, 6010, 7470.

TCLP METALS SPIKE: 15.0 mg/L As, 5.5 mg/L Se; 0.5 mg/L Ba; 5.0 mg/L Cr; 3.8 mg/L Cd, Pb; 0.2 mg/L Ag; and 0.05 mg/L Hg.

TCLP METALS QC: 5.0 mg/L As, Se, Ba; 0.13 mg/L Cd, Ag; 0.5 mg/L Cr; 1.25 mg/L Pb; 0.0050 mg/L Hg.

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

Date

9-16-96

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
KOCH PIPELINE
Attention: Dennis Wilks
2121 French Dr.
Hobbs, NM 88240

September 16, 1996
Receiving Date: 09/04/96
Sample Type: Soil
Project No: NA
Project Location: Townsend Station

Extraction Date: 09/07/96
Analysis Date: 09/10/96
Sampling Date: 09/03/96
Sample Condition: I & C
Sample Received by: ML
Project Name: NA

TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T58385 Soil Sample	QC	RPD	%EA	%IA
Vinyl chloride	0.20	0.05	ND	0.105	3	110	105
1,1-Dichloroethene	0.70	0.05	ND	0.097	3	104	97
Methyl Ethyl Ketone	200.0	0.5	ND	0.109	1	97	109
Chloroform	6.00	0.05	ND	0.106	5	106	106
1,2-Dichloroethane	0.50	0.05	ND	0.108	6	110	108
Benzene	0.50	0.05	ND	0.102	6	102	102
Carbon Tetrachloride	0.50	0.05	ND	0.100	7	107	100
Trichloroethene	0.50	0.05	ND	0.092	7	103	95
Tetrachloroethene	0.70	0.05	ND	0.092	6	93	92
Chlorobenzene	100.00	0.05	ND	0.101	6	100	101
1,4-Dichlorobenzene	7.50	0.05	ND	0.100	7	100	100

SURROGATES	% Recovery
Dibromofluoromethane	106
Toluene-d8	103
4-Bromofluorobenzene	102

ND = Not Detected

METHODS: EPA SW 846-1311, 8260.
CHEMIST: RP



Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

LD HUBBS
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NOV 15 1996
RECEIVED
9-16-96

DATE

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
KOCH PIPELINE
Attention: Dennis Wilks
2121 French Dr.
Hobbs, NM 88240

September 16, 1996
Receiving Date: 09/04/96
Sample Type: Soil
Project No: NA
Project Location: Townsend Station

Extraction Date: 09/04/96
Analysis Date: 09/05/96
Sampling Date: 09/03/96
Sample Condition: I & C
Sample Received by: ML
Project Name: NA

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T58385 Soil Sample	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	76	10	49	95
1,4-Dichlorobenzene	7.5	0.05	ND	74	6	51	93
o-Cresol	200.0	0.05	ND	85	7	63	106
m,p-Cresol	200.0	0.05	ND	79	5	115	99
Total Cresol	200.0	0.05	ND	---	---	---	---
Hexachloroethane	3.0	0.05	ND	85	5	58	106
Nitrobenzene	2.0	0.05	ND	71	7	59	89
Hexachlorobutadiene	0.5	0.05	ND	79	7	49	99
2,4,6-Trichlorophenol	2.0	0.05	ND	82	15	67	103
2,4,5-Trichlorophenol	400.0	0.05	ND	93	1	73	116
2,4-Dinitrotoluene	0.13	0.05	ND	91	10	80	114
2,4-D	10.0	0.05	ND	92	18	64	115
Hexachlorobenzene	0.13	0.05	ND	78	9	68	98
2,4,5-TP	1.0	0.05	ND	86	14	68	108
Pentachlorophenol	100.0	0.05	ND	91	9	73	114
Chlordane	0.03	0.001	ND	---	15	78	96
Toxaphene	0.5	0.05	ND	---	3	89	93
Lindane	0.4	0.001	ND	---	20	80	88
Heptachlor	0.008	0.001	ND	---	16	74	92
Heptachlor epoxide	0.008	0.001	ND	---	15	78	92
Total Heptachlor	0.008	0.001	ND	---	---	---	---
Endrin	0.02	0.001	ND	---	17	83	94
Methoxychlor	10.0	0.1	ND	---	16	74	88

Surrogates

% RECOVERY

2-Fluorophenol 41
Phenol-d6 26
Nitrobenzene-d5 60
2-Fluorobiphenyl 68
2,4,6-Tribromophenol 69
Terphenyl-d14 74

Methods: EPA SW 846-1311, 8270, 8080.

CHEMIST: RD/CC/MB

ND - Not Detected

PS

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

HOBBS
OFFICE

NO. 10 LRU

RECEIVED

9-16-96

DATE

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

P.O. Box 1030
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

NEW MEXICO
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Originated 8/8/95

Submit Original
Plus 1 Copy
to appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator KOCH
Verbal Approval Received: Yes ☐ No ☒	5. Originating Site KNOWLES STATION
2. Management Facility Destination GMI LAND FARM	6. Transporter GANDY
3. Address of Facility Operator BOX 1658 ROSWELL	8. State NM
7. Location of Material (Street Address or ULSTR) P- Box 34, T5165-R37E - CAME FROM KNOXVILLE SE EAST LOVINGTON	
9. Circle One: 5016 LOCATION NE EAST LOVINGTON 16-15TS-R37E	
A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.	
B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.	
All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL: CONTAMINATED SOIL FROM PIPELINE LEAK

OLD MEXICO
NOV 13 1
RECEIVED

Estimated Volume 108 cy Known Volume (to be entered by the operator at the end of the haul) cy

SIGNATURE: [Signature] TITLE: Supervisor DATE: 11/1/96
Waste Management Facility Authorized Agent
TYPE OR PRINT NAME: Jon R GANDY TELEPHONE NO. 505 396-4948

(This space for State Use)		
APPROVED BY: <u>[Signature]</u>	TITLE: <u>ENR ENGR</u>	DATE: <u>11/13/96</u>
APPROVED BY: <u>[Signature]</u>	TITLE: <u>Bureau Chief</u>	DATE: <u>1/18/96</u>

Printed in Hobbs 11/18/96

Chain of Custody Record

ARDINAL LABORATORIES

PHONE: (505) 393-2326 • 101 E. MARLAND • HOBBS, NEW MEXICO 88240

Project I.D.:

Project I.D. _____
Project Location Norris, Ranch

Sampled By Joe Frank. Dean C-11

Client Name Koch Oil

W2669-1,2,3,4
also H 2669-5 composite of 1,2,3,4

Address _____
Telephone 505-397-6388

Telephone

505. 397-6388 fax 397617

Number of Containers

**Sample
Location**

Grab

Composite

0411

Date _____

Sample Number

① ground
② 2'
③ 4'
④ 4'

COMPOSITE OR SAMPLES
1, 2, 3, 4 -

Released by: (S) (S)

Dato	Ylmo
------	------

Received by (Signature)

Wm. J. Cooke

5410011

Shipped/Delivered

GANDY MARLEY, INC.
P. O. BOX 827
TATUM, NEW MEXICO 88267
TATUM, NEW MEXICO ROSWELL, NEW MEXICO

CERTIFICATE OF WASTE STATUS
OILFIELD NON-EXEMPT WASTE MATERIAL

Originating Location: KOCH PIPELINE

Source: PIPELINE LEAK

Disposal Location: GMI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for KOCH PIPELINE Co, L.P.
concur with the status of the waste from the subject site.

Name PAUL L. HOLLAND

Title/Agency TEAM LEADER

Address 2121 FRENCH DRIVE

Hobbs, NM 88240

Signature Paul L. Holland

Date 11/1/96

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PHONE (806) 799-2800 • 6292 34th ST. • LUBBOCK, TX 79407

ANALYTICAL RESULTS FOR
BBC INTERNATIONAL
ATTN: JOE FRANK DEAN, CEI
P.O. BOX 297
HOBBS, NM 88241
FAX TO: 505-397-0397

Receiving Date: 10/04/96
Reporting Date: 10/08/96
Project Number: NOT GIVEN
Project Name: KOCH OIL
Project Location: NORRIS RANCH
Lab Number: H2669-5
Sample ID: COMPOSITE OF 1-4

Analysis Date: 10/06/96
Sampling Date: 10/04/96
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

TCLP VOLATILES (ppm)	EPA LIMIT	Sample Result H2669-5	Method Blank	QC	True Value %IA	QC
Vinyl Chloride	0.20	<0.005	<0.005	0.119	119	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.095	95	0.100
Methyl Ethyl Ketone	200	0.021	<0.005	0.083	83	0.100
Chloroform	6.0	<0.005	<0.005	0.088	89	0.100
1,2-Dichloroethane	0.5	<0.005	<0.005	0.102	102	0.100
Benzene	0.5	0.295	<0.005	0.098	98	0.100
Carbon Tetrachloride	0.5	<0.005	<0.005	0.098	98	0.100
Trichloroethylene	0.5	<0.005	<0.005	0.102	102	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.104	104	0.100
Chlorobenzene	100	<0.005	<0.005	0.105	105	0.100
1,4-Dichlorobenzene	7.5	<0.005	<0.005	0.102	102	0.100

% RECOVERY

Dibromofluoromethane	76
Toluene-d8	82
Bromofluorobenzene	81

METHODS: EPA SW 846-8260

Burgess J. Cook
Burgess J. Cook, Ph. D.

10/8/96
Date

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ANALYTICAL RESULTS FOR
BBC INTERNATIONAL
ATTN: JOE FRANK DEAN, CEI
P.O. BOX 297
HOBBS, NM 88241
FAX TO: 505-397-0397

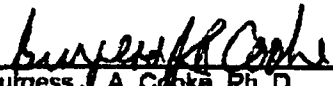
Receiving Date: 10/04/96
Reporting Date: 10/08/96
Project Number: NOT GIVEN
Project Name: KOCH OIL
Project Location: NORRIS RANCH

Analysis Date: 10/08/96
Sampling Date: 10/04/96
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

LAB NUMBER	SAMPLE ID	IGNITABILITY
H2869-5	COMPOSITE OF 1-4	Nonflammable
Quality Control		NR
True Value QC		NR
% Accuracy		NR
Relative Percent Difference		NR

METHOD: SW 846-1030 (Proposed)

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Date

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ANALYTICAL RESULTS FOR
BBC INTERNATIONAL
ATTN: JOE FRANK DEAN, CEI
P.O. BOX 297
HOBBS, NM 88241
FAX TO: 505-397-0397

Receiving Date: 10/04/96
Reporting Date: 10/10/96
Project Number: NOT GIVEN
Project Name: KOCH OIL
Project Location: NORRIS RANCH
Lab Number: H2669-5
Sample ID: COMPOSITE OF 1-4

Analysis Date: 10/09/96
Sampling Date: 10/04/96
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Sample Result H2669-5	Method Blank	QC	True Value %IA	QC
Pyridine	5.00	<0.002	<0.002	0.047	94	0.050
1,4-Dichlorobenzene	7.50	<0.002	<0.002	0.047	94	0.050
o-Cresol	200	<0.002	<0.002	0.048	96	0.050
m, p-Cresol	200	<0.002	<0.002	0.046	92	0.050
Hexachloroethane	3.00	<0.002	<0.002	0.048	96	0.050
Nitrobenzene	2.00	<0.002	<0.002	0.049	98	0.050
Hexachloro-1,3-butadiene	0.500	<0.002	<0.002	0.047	94	0.050
2,4,6-Trichlorophenol	2.00	<0.002	<0.002	0.048	96	0.050
2,4,5-Trichlorophenol	400	<0.002	<0.002	0.049	98	0.050
2,4-Dinitrotoluene	0.130	<0.002	<0.002	0.047	94	0.050
Hexachlorobenzene	0.130	<0.002	<0.002	00.0	92	0.050
Pentachlorophenol	100	<0.002	<0.002	0.046	92	0.050

% RECOVERY

Fluorophenol	50
Phenol-d5	46
Nitrobenzene-d5	89
2-Fluorobiphenyl	88
2,4,6-Tribromophenol	89
Terphenyl-d14	91

METHODS: EPA SW 846-8270
MI - Matrix Interference

Burgess J/A. Cooks, Ph.D.

10/10/96
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ANALYTICAL RESULTS FOR
BBC INTERNATIONAL
ATTN: JOE FRANK DEAN, CEI
P.O. BOX 297
HOBBS, NM 88241
FAX TO: 505-397-0397

Receiving Date: 10/04/96
Reporting Date: 10/11/96
Project Number: NOT GIVEN
Project Name: KOCH OIL
Project Location: NORRIS RANCH

Sampling Date: 10/04/96
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

LAB NUMBER SAMPLE ID REACTIVITY
Sulfide Cyanide CORROSIVITY
(ppm) (ppm) (pH)

ANALYSIS DATE:	10/8/96	10/8/96	10/11/96
H2669-5 COMPOSITE	<10	<10	6.77
OF 1-4			
Quality Control	NR	NR	6.99
True Value QC	NR	NR	7.00
% Accuracy	NR	NR	99.9
Relative Percent Difference	NR	NR	0.1

METHOD: EPA SW 846-7.3, 7.2

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Burgess J. Cook
Chemist

10/11/96
Date



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ANALYTICAL RESULTS FOR
BBC INTERNATIONAL
ATTN: JOE FRANK DEAN, CEI
P.O. BOX 297
HOBBS, NM 88241
FAX TO: 505-397-0397

Receiving Date: 10/04/96
Reporting Date: 10/21/96
Project Number: NOT GIVEN
Project Name: KOCH OIL
Project Location: NORRIS RANCH

Sampling Date: 10/04/96
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: AK

TCLP METALS

LAB NUMBER	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
------------	-----------	-----------	-----------	-----------	-----------	-----------	-----------	-----------	-----------

ANALYSIS DATE:	10/16/96	10/16/96	10/16/96	10/16/96	10/16/96	10/16/96	10/16/96	10/16/96	10/16/96
EPA LIMITS:	5	5	100	1	5	5	0.2	1	
H2669-5	COMPOSITE OF	<0.2	<0.05	2.0	<0.05	<0.05	0.14	<0.02	<0.2
	1 THROUGH 4								
Quality Control		2.47	5.00	4.75	0.595	5.05	2.58	0.0086	0.445
True Value QC		2.50	5.00	5.00	0.500	5.00	2.50	0.0100	0.500
% Accuracy		99	100	95	99	101	103	86	89
Relative Percent Difference		1	1	0	1	0	1	3	0

METHODS: EPA 1311, 600/4-91/01	200.7	200.7	200.7	200.7	200.7	200.7	245.1	200.7
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Wei Li

Wei Li, Chemist

NOV 13

Date

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Hobbs, NM 88241-1980
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P.O. Box 1940
Hobbs, NM 88241-1980
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 4/18/95

Submit Original
Plus 1 Copy
to appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator KOCH OIL
Verbal Approval Received: Yes ☐ No ☒	5. Originating Site CROUCH STATION
2. Management Facility Destination GMI	6. Transporter GANDY CORP.
3. Address of Facility Operator 34 MILES WEST OF TATUM	8. State NEW MEXICO
7. Location of Material (Street Address or ULSTR) ARKANSAS JUNCT	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. (B) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

CONTAMINATED DIRT FROM PIPELINE LEAK

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Estimated Volume 2000 yds cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Larry Gandy TITLE: V-Pres DATE: 2-13-97
Waste Management Facility Authorized Agent
TYPE OR PRINT NAME: LARRY GANDY TELEPHONE NO. 505-398-4960

(This space for State Use)		
APPROVED BY: <u>Wayne Price</u>	TITLE: <u>ENVR ENGR</u>	DATE: <u>2/26/97</u>
APPROVED BY: <u>Logan Chudman</u>	TITLE: <u>Bureau Chief</u>	DATE: <u>3/5/97</u>

Printed in Hobbs 3/5/97

GANDY MARLEY, INC.
P. O. BOX 827
TATUM, NEW MEXICO 88267
TATUM, NEW MEXICO ROSWELL, NEW MEXICO

CERTIFICATE OF WASTE STATUS
OILFIELD NON-EXEMPT WASTE MATERIAL

Originating Location: KOCH PIPELINE COMPANY-CROUCH STATION
2 MILES NORTH OF ARKANSAS JUNCTION, WEST 2.5 MILES.

Source: PIPELINE LEAK INSIDE TANK FARM

Disposal Location: GMI- 43 MILES WEST OF TATUM, 3 MILES SOUTH

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for KOCH PIPELINE COMPANY
concur with the status of the waste from the subject site.

Name PAUL HOLLAND

Title/Agency DISTRICT MANAGER

Address 2121 N. FRENCH DRIVE

HOBBS, N.M. 88240

Signature Paul Holland

Date 2-21-1997

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PHONE (806) 796-2800 • 5262 34th ST. • LUBBOCK, TX 79407

ANALYTICAL RESULTS FOR
SAFETY & ENVIRONMENTAL SOLUTIONS, INC.
ATTN: DYKE BROWNING
703 E. CLINTON
HOBBS, NM 88240
FAX TO:

Receiving Date: 11/01/96
Reporting Date: 11/04/96
Project Number: NOT GIVEN
Project Name: CROUCH STATION (KOCH)
Project Location: SOUTH OF LOVINGTON, NM

Sampling Date: 11/01/96
Sample Type: SOIL
Sample Condition: COOL, INTACT
Sample Received By: BC
Analyzed By: GP

LAB NUMBER SAMPLE ID REACTIVITY
Sulfide Cyanide CORROSIVITY IGNITABILITY
(ppm) (ppm) (pH)

ANALYSIS DATE:	10/5/96	10/5/96	10/4/96	10/4/96
H2695-15 RANDOM COMP.	<5	<5	7.40	Nonflammable
SPOILS PILE				
Quality Control	NR	NR	7.02	NR
True Value QC	NR	NR	7.00	NR
% Accuracy	NR	NR	100	NR
Relative Percent Difference	NR	NR	0.6	NR

METHOD: EPA SW 846-7.3, 7.2, 1010

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Chemist

11/04/96
Date



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PHONE (806) 796-2800 • 5262 34th ST. • LUBBOCK, TX 79407

ANALYTICAL RESULTS FOR
SAFETY & ENVIRONMENTAL SOLUTIONS, INC.
ATTN: DYKE BROWNING
703 E. CLINTON
HOBBS, NM 88240
FAX TO:

Receiving Date: 11/01/96
Reporting Date: 11/06/96
Project Number: NOT GIVEN
Project Name: CROUCH STATION (KOCH)
Project Location: SOUTH OF LOVINGTON, NM
Sample ID: RANDOM COMPOSITE OF SPOILS PILE
Lab Number: H2693-15

Analysis Date: 11/05/96
Sampling Date: 11/01/96
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

TCLP VOLATILES (ppm)	EPA LIMIT	Sample Result H2693-15	Method Blank	QC	True Value %IA	QC
Vinyl Chloride	0.20	<0.005	<0.005	0.085	85	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.115	115	0.100
Methyl Ethyl Ketone	200	<0.005	<0.005	0.082	82	0.100
Chloroform	6.0	<0.005	<0.005	0.093	93	0.100
1,2-Dichloroethane	0.5	<0.005	<0.005	0.083	83	0.100
Benzene	0.5	<0.005	<0.005	0.082	82	0.100
Carbon Tetrachloride	0.5	<0.005	<0.005	0.082	82	0.100
Trichloroethylene	0.5	<0.005	<0.005	0.088	88	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.105	105	0.100
Chlorobenzene	100	<0.005	<0.005	0.091	91	0.100
1,4-Dichlorobenzene	7.5	<0.005	<0.005	0.090	90	0.100

% RECOVERY

Dibromofluoromethane	104
Toluene-d8	98
Bromofluorobenzene	98

METHODS: EPA SW 846-8260

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Burgess J. A. Cooke, Ph. D.
Burgess J. A. Cooke, Ph. D.

11/6/96
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PHONE (806) 796-2800 • 5262 34th ST. • LUBBOCK, TX 79407

ANALYTICAL RESULTS FOR
SAFETY & ENVIRONMENTAL SOLUTIONS, INC.
ATTN: DYKE BROWNING
703 E. CLINTON
HOBBS, NM 88240
FAX TO:

Receiving Date: 11/01/96
Reporting Date: 11/04/96
Project Number: NOT GIVEN
Project Name: CROUCH STATION (KOCH)
Project Location: SOUTH OF LOVINGTON, NM
Sample ID: RANDOM COMPOSITE OF SPOILS PILE
Lab Number: H2693-15

Analysis Date: 11/02/96
Sampling Date: 11/01/96
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Sample Result H2693-15	Method Blank	QC	True Value %IA	QC
Pyridine	5.00	<0.008	<0.002	0.049	98	0.050
1,4-Dichlorobenzene	7.50	<0.008	<0.002	0.049	98	0.050
o-Cresol	200	<0.008	<0.002	0.052	104	0.050
m, p-Cresol	200	<0.008	<0.002	0.053	106	0.050
Hexachloroethane	3.00	<0.008	<0.002	0.050	100	0.050
Nitrobenzene	2.00	<0.008	<0.002	0.049	98	0.050
Hexachloro-1,3-butadiene	0.500	<0.008	<0.002	0.048	96	0.050
2,4,6-Trichlorophenol	2.00	<0.008	<0.002	0.049	98	0.050
2,4,5-Trichlorophenol	400	<0.008	<0.002	0.050	100	0.050
2,4-Dinitrotoluene	0.130	<0.008	<0.002	0.051	102	0.050
Hexachlorobenzene	0.130	<0.008	<0.002	0.050	100	0.050
Pentachlorophenol	100	<0.008	<0.002	0.048	96	0.050

% RECOVERY

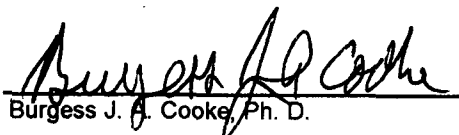
Fluorophenol	72
Phenol-d5	69
Nitrobenzene-d5	89
2-Fluorobiphenyl	95
2,4,6-Tribromophenol	87
Terphenyl-d14	103

METHODS: EPA SW 846-8270

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Burgess J. A. Cooke, Ph. D.

11/04/96
Date

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PHONE (806) 796-2800 • 5262 34th ST. • LUBBOCK, TX 79407

ANALYTICAL RESULTS FOR
SAFETY & ENVIRONMENTAL SOLUTIONS, INC.
ATTN: DYKE BROWNING
703 EAST CLINTON
HOBBS, NEW MEXICO 88240
FAX TO: 505-393-4388

Receiving Date: 11/01/96
Reporting Date: 11/11/96
Project Number: NOT GIVEN
Project Name: CROUCH STATION (KOCH)
Project Location: SOUTH OF LOVINGTON, NM

Sampling Date: 11/01/96
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: LW & AK

TCLP METALS

LAB NUMBER SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:	11/6/96	11/6/96	11/6/96	11/6/96	11/6/96	11/6/96	11/6/96	11/6/96
EPA LIMITS:	5	5	100	1	5	5	0.2	1
H2693-15 COMP. SPOILS PILE	<0.05	<0.05	0.70	<0.01	<0.05	0.16	<0.002	<0.05
Quality Control	2.450	4.750	4.750	4.650	4.440	2.500	0.0089	0.435
True Value QC	2.500	5.000	5.000	5.000	5.000	2.500	0.0100	0.500
% Accuracy	98	95	95	93	88	100	89	87
Relative Percent Difference	1	1	2	1	1	1	6	1

METHODS: EPA 1311, 600/4-91/	200.7	200.7	200.7	200.7	200.7	200.7	245.1	200.7
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FEB 25 1997
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GAYLE A. POTTER
Chemist

11/11/96
Date

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PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

PHONE (806) 796-2800 • 5262 34th ST. • LUBBOCK, TX 79407

ANALYTICAL RESULTS FOR
SAFETY & ENVIRONMENTAL SOLUTIONS, INC.
ATTN: DEE WHATLEY
703 E. CLINTON

Receiving Date: 10/25/96
Reporting Date: 11/01/96
Project Number: NOT GIVEN
Project Name: CROUCH STATION 490
Project Location: KOCH OIL CROUCH STATION 490
Sample ID: 1-1, 5 FT
Lab Number: H2693-1

HOBBS, NM 88240
FAX TO:

Analysis Date: 10/31/96
Sampling Date: 10/25/96
Sample Type: SOIL
Sample Condition: COOL & INTAC
Sample Received By: WL
Analyzed By: BC

EPA 8015M - (ppm) Sample Result Method True Value
H2693-1 Blank QC %IA QC

C-8 n-Octane	89.0	<0.5	86.6	87	100
C-9 n-Nonane	113	<0.5	86.6	87	100
C-10 n-Decane	147	<0.5	87.0	87	100
C-11 n-Undecane	178	<0.5	81.2	81	100
C-12 n-Dodecane	144	<0.5	81.5	82	100
C-13 n-Tridecane	156	<0.5	83.2	83	100
C-14 n-Tetradecane	181	<0.5	84.9	85	100
C-15 n-Pentadecane	164	<0.5	88.9	89	100
C-16 n-Hexadecane	168	<0.5	85.5	86	100
C-17 n-Heptadecane	140	<0.5	88.6	89	100
C-18 n-Octadecane	186	<0.5	84.6	85	100
C-19 n-Nonadecane	130	<0.5	83.3	83	100
C-20 n-Eicosane	91.5	<0.5	82.4	82	100
C-21 n-Heneicosane	69.0	<0.5	80.9	81	100
C-22 n-Docosane	71.8	<0.5	82.3	82	100
C-23 n-Tricosane	57.5	<0.5	84.5	84	100
C-24 n-Tetracosane	56.0	<0.5	83.8	84	100
C-25 n-Pentacosane	57.0	<0.5	82.5	83	100
C-26 n-Hexacosane	46.2	<0.5	83.2	83	100
C-27 n-Heptacosane	40.6	<0.5	83.7	84	100
C-28 n-Octacosane	34.0	<0.5	84.2	84	100

METHOD: EPA SW 846-8015 M (by GC/MS)


Burgess J. A. Cooke, Ph. D.

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ANALYTICAL RESULTS FOR
SAFETY & ENVIRONMENTAL SOLUTIONS, INC.
ATTN: DEE WHATLEY
703 E. CLINTON

Receiving Date: 10/25/96
Reporting Date: 11/01/96
Project Number: NOT GIVEN
Project Name: CROUCH STATION 490
Project Location: KOCH OIL CROUCH STATION 490
Sample ID: 1-2, 10 FT
Lab Number: H2693-2

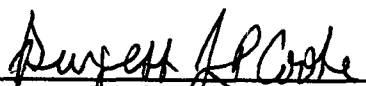
HOBBS, NM 88240
FAX TO:

Analysis Date: 10/31/96
Sampling Date: 10/25/96
Sample Type: SOIL
Sample Condition: COOL & INTAC
Sample Received By: WL
Analyzed By: BC

EPA 8015M - (ppm) Sample Result Method True Value
H2693-2 Blank QC %IA QC

C-8 n-Octane	331	<0.5	86.6	87	100
C-9 n-Nonane	276	<0.5	86.6	87	100
C-10 n-Decane	336	<0.5	87.0	87	100
C-11 n-Undecane	372	<0.5	81.2	81	100
C-12 n-Dodecane	308	<0.5	81.5	82	100
C-13 n-Tridecane	354	<0.5	83.2	83	100
C-14 n-Tetradecane	353	<0.5	84.9	85	100
C-15 n-Pentadecane	315	<0.5	88.9	89	100
C-16 n-Hexadecane	279	<0.5	85.5	86	100
C-17 n-Heptadecane	268	<0.5	88.6	89	100
C-18 n-Octadecane	261	<0.5	84.6	85	100
C-19 n-Nonadecane	264	<0.5	83.3	83	100
C-20 n-Eicosane	221	<0.5	82.4	82	100
C-21 n-Heneicosane	181	<0.5	80.9	81	100
C-22 n-Docosane	155	<0.5	82.3	82	100
C-23 n-Tricosane	142	<0.5	84.5	84	100
C-24 n-Tetracosane	121	<0.5	83.8	84	100
C-25 n-Pentacosane	122	<0.5	82.5	83	100
C-26 n-Hexacosane	94.5	<0.5	83.2	83	100
C-27 n-Heptacosane	76.5	<0.5	83.7	84	100
C-28 n-Octacosane	63.8	<0.5	84.2	84	100

METHOD: EPA SW 846-8015 M (by GC/MS)


Burgess J. A. Cooke, Ph. D.

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ANALYTICAL RESULTS FOR
SAFETY & ENVIRONMENTAL SOLUTIONS, INC.
ATTN: DEE WHATLEY
703 E. CLINTON

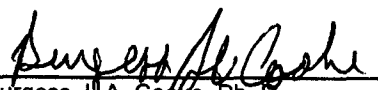
Receiving Date: 10/25/96
Reporting Date: 11/01/96
Project Number: NOT GIVEN
Project Name: CROUCH STATION 490
Project Location: KOCH OIL CROUCH STATION 490
Sample ID: 1-3,15 FT
Lab Number: H2693-3

HOBBS, NM 88240
FAX TO:

Analysis Date: 10/31/96
Sampling Date: 10/25/96
Sample Type: SOIL
Sample Condition: COOL & INTAC
Sample Received By: WL
Analyzed By: BC

EPA 8015M - (ppm)	Sample Result H2693-3	Method Blank	QC	%IA	True Value QC
C-8 n-Octane	5.3	<0.5	86.6	87	100
C-9 n-Nonane	9.6	<0.5	86.6	87	100
C-10 n-Decane	16.9	<0.5	87.0	87	100
C-11 n-Undecane	27.2	<0.5	81.2	81	100
C-12 n-Dodecane	24.0	<0.5	81.5	82	100
C-13 n-Tridecane	32.8	<0.5	83.2	83	100
C-14 n-Tetradecane	32.4	<0.5	84.9	85	100
C-15 n-Pentadecane	33.4	<0.5	88.9	89	100
C-16 n-Hexadecane	26.3	<0.5	85.5	86	100
C-17 n-Heptadecane	25.6	<0.5	88.6	89	100
C-18 n-Octadecane	25.1	<0.5	84.6	85	100
C-19 n-Nonadecane	28.8	<0.5	83.3	83	100
C-20 n-Eicosane	27.2	<0.5	82.4	82	100
C-21 n-Heneicosane	17.5	<0.5	80.9	81	100
C-22 n-Docosane	17.5	<0.5	82.3	82	100
C-23 n-Tricosane	13.5	<0.5	84.5	84	100
C-24 n-Tetracosane	17.1	<0.5	83.8	84	100
C-25 n-Pentacosane	15.7	<0.5	82.5	83	100
C-26 n-Hexacosane	14.0	<0.5	83.2	83	100
C-27 n-Heptacosane	11.4	<0.5	83.7	84	100
C-28 n-Octacosane	12.3	<0.5	84.2	84	100

METHOD: EPA SW 846-8015 M (by GC/MS)


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ANALYTICAL RESULTS FOR
SAFETY & ENVIRONMENTAL SOLUTIONS, INC.
ATTN: DEE WHATLEY
703 E. CLINTON
HOBBS, NM 88240
FAX TO:

Receiving Date: 10/25/96
Reporting Date: 11/01/96
Project Number: NOT GIVEN
Project Name: CROUCH STATION 490
Project Location: KOCH OIL CROUCH STATION 490

Analysis Date: 10/31/96
Sampling Date: 10/25/96
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: WL
Analyzed By: BC

LAB NUMBER SAMPLE ID* TPH
(ppm)

H2693-4	1-4	20 FT	<10
H2693-5	1-5	25 FT	<10
H2693-6	1-6	30 FT	<10
H2693-7	1-7	35 FT	<10
H2693-8	1-8	40 FT	<10
H2693-10	3-1	10 FT	<10
H2693-11	4-1	10 FT	<10
H2693-12	1-4	10 FT	<10
H2693-13	BACKGROUND		<10

METHOD: EPA SW 846-8015 M (by GC/MS)

*Samples negative for n-alkanes only. Positive samples and QC reported elsewhere.

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Burgess J. A. Cooke / Ph. D.

11/1/96
Date

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PHONE (806) 796-2800 • 5262 34th ST. • LUBBOCK, TX 79407

ANALYTICAL RESULTS FOR
SAFETY & ENVIRONMENTAL SOLUTIONS, INC.
ATTN: DYKE BROWNING
703 E. CLINTON
HOBBS, NM 88240
FAX TO:

Receiving Date: 11/01/96
Reporting Date: 11/04/96
Project Number: NOT GIVEN
Project Name: CROUCH STATION (KOCH)
Project Location: SOUTH OF LOVINGTON, NM

Analysis Date: 11/01/96
Sampling Date: 11/01/96
Sample Type: SOIL
Sample Condition: COOL, INTACT
Sample Received By: BC
Analyzed By: GP

LAB NUMBER SAMPLE ID TPH
(ppm)

H2693-14	RANDOM COMP., BERM	17400
Quality Control		406
True Value QC		400
% Accuracy		102
Relative Percent Difference		1.8

METHOD: EPA 418.1, 3510, 3540, or 3550; Infrared Spectroscopy

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Chemist

Burjess P. Cash

Date

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ANALYTICAL RESULTS FOR
SAFETY & ENVIRONMENTAL SOLUTIONS, INC.
ATTN: DYKE BROWNING
703 E. CLINTON

Receiving Date: 11/01/96

Reporting Date: 11/01/96

Project Number: NOT GIVEN

Project Name: CROUCH STATION (KOCH)

Project Location: SOUTH OF LOVINGTON, NM

Sample ID: RANDOM COMPOSITE INSIDE BERM

Lab Number: H2693-14

HOBBS, NM 88240

FAX TO:

Analysis Date: 11/01/96

Sampling Date: 11/01/96

Sample Type: SOIL

Sample Condition: COOL & INTACT

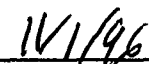
Sample Received By: BC

Analyzed By: BC

EPA 8015M - (ppm)	Sample Result H2693-14	Method Blank	True Value		
			QC	%IA	QC
C-8 n-Octane	<0.5	<0.5	86.6	87	100
C-9 n-Nonane	4.6	<0.5	86.6	87	100
C-10 n-Decane	17.5	<0.5	87.0	87	100
C-11 n-Undecane	37.6	<0.5	81.2	81	100
C-12 n-Dodecane	47.0	<0.5	81.5	82	100
C-13 n-Tridecane	69.8	<0.5	83.2	83	100
C-14 n-Tetradecane	90.2	<0.5	84.9	85	100
C-15 n-Pentadecane	76.5	<0.5	88.9	89	100
C-16 n-Hexadecane	69.0	<0.5	85.5	86	100
C-17 n-Heptadecane	77.9	<0.5	88.6	89	100
C-18 n-Octadecane	71.0	<0.5	84.6	85	100
C-19 n-Nonadecane	95.0	<0.5	83.3	83	100
C-20 n-Eicosane	102	<0.5	82.4	82	100
C-21 n-Heneicosane	61.0	<0.5	80.9	81	100
C-22 n-Docosane	100	<0.5	82.3	82	100
C-23 n-Tricosane	82.6	<0.5	84.5	84	100
C-24 n-Tetracosane	65.8	<0.5	83.8	84	100
C-25 n-Pentacosane	66.7	<0.5	82.5	83	100
C-26 n-Hexacosane	53.4	<0.5	83.2	83	100
C-27 n-Heptacosane	41.4	<0.5	83.7	84	100
C-28 n-Octacosane	37.8	<0.5	84.2	84	100

METHOD: EPA SW 846-8015 M (by GC/MS)


Burgess J. A. Cooke, Ph. D.


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ANALYTICAL RESULTS FOR
SAFETY & ENVIRONMENTAL SOLUTIONS, INC.
ATTN: DEE WHATLEY
703 E. CLINTON

Receiving Date: 10/25/96
Reporting Date: 11/01/96
Project Number: NOT GIVEN
Project Name: CROUCH STATION 490
Project Location: KOCH OIL CROUCH STATION 490
Sample ID: 2-1, 10 FT
Lab Number: H2693-9

HOBBS, NM 88240
FAX TO:

Analysis Date: 10/31/96
Sampling Date: 10/25/96
Sample Type: SOIL
Sample Condition: COOL & INTAC
Sample Received By: WL
Analyzed By: BC

EPA 8015M - (ppm) Sample Result Method True Value
H2693-9 Blank QC %IA QC

C-8 n-Octane	<0.5	<0.5	86.6	87	100
C-9 n-Nonane	<0.5	<0.5	86.6	87	100
C-10 n-Decane	4.15	<0.5	87.0	87	100
C-11 n-Undecane	6.15	<0.5	81.2	81	100
C-12 n-Dodecane	6.00	<0.5	81.5	82	100
C-13 n-Tridecane	7.00	<0.5	83.2	83	100
C-14 n-Tetradecane	8.00	<0.5	84.9	85	100
C-15 n-Pentadecane	7.05	<0.5	88.9	89	100
C-16 n-Hexadecane	5.50	<0.5	85.5	86	100
C-17 n-Heptadecane	5.80	<0.5	88.6	89	100
C-18 n-Octadecane	5.20	<0.5	84.6	85	100
C-19 n-Nonadecane	5.15	<0.5	83.3	83	100
C-20 n-Eicosane	4.90	<0.5	82.4	82	100
C-21 n-Heneicosane	3.85	<0.5	80.9	81	100
C-22 n-Docosane	3.70	<0.5	82.3	82	100
C-23 n-Tricosane	3.15	<0.5	84.5	84	100
C-24 n-Tetracosane	4.35	<0.5	83.8	84	100
C-25 n-Pentacosane	4.00	<0.5	82.5	83	100
C-26 n-Hexacosane	3.10	<0.5	83.2	83	100
C-27 n-Heptacosane	3.00	<0.5	83.7	84	100
C-28 n-Octacosane	3.60	<0.5	84.2	84	100

METHOD: EPA SW 846-8015 M (by GC/MS)

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Burgess A. Cooke
Burgess A. Cooke, Ph. D.

11/1/96
Date

Safety & Environmental Solutions, Inc.

703 E. Clinton, Suite 103, Hobbs, New Mexico 88240
(505)397-0510

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Name:

Phone #: 397-0510

ANALYSIS REQUEST

Company Name & Address:

FAX #: 393-4385

Koch

Project #:

Project Name:

Project Location:

South of Lovington NM

Sampler Signature:

Couch Station

LAB #
(LAB USE ONLY)

FIELD CODE

CONTAINERS

Volume/Amount

MATRIX

PRESERVATIVE METHOD

SAMPLING

WATER
SOIL
AIR
SLUDGE
OTHER

HCL
HNO3
ICE
NONE
OTHER

DATE

TIME

BTEX 8020/5030

TPH 418.1

TCLP Metals Ag As Ba Cd Cr Pb Hg Se

Total Metals Ag As Ba Cd Cr Pb Hg Se

TCLP Volatiles

TCLP Semi Volatiles

TDS

RCI

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14

Random Composite inside

Born 11/19/96 DAD

1

12oz

X

X

11/19/96 9:33

X

X

X

X

X

X

X

X

X

X

X

X

X

X

X

X

X

X

X

X

X

X

15

Random Composite

of spoils Pile

1

12oz

X

X

11/19/96 10:00

X

X

X

X

X

X

X

X

X

X

X

X

X

X

X

X

X

X

X

X

X

X

Relinquished by:

Date:

Time:

Received by:

REMARKS

Relinquished by:

Date:

Time:

Received by:

REMARKS

Relinquished by:

Date:

Time:

Received by:

REMARKS

Relinquished by:

Date:

Time:

Received by:

REMARKS

Sampling witnessed by
Kenneth Burns

Safety & Environmental Solutions, Inc.

Koch Pipeline
2121 N. French Drive
Hobbs, NM 88240
Attention: Mr. Paul Holland

November 5, 1996

Dear Paul:

On November 1, 1996, Safety & Environmental Solutions, Inc. was engaged to accomplish sampling at the Crouch Station site located south of Lovington, NM. Sampling was done to determine the status of the soil generated as a result of the recent leak inside the firewall as hazardous waste or non-hazardous waste.

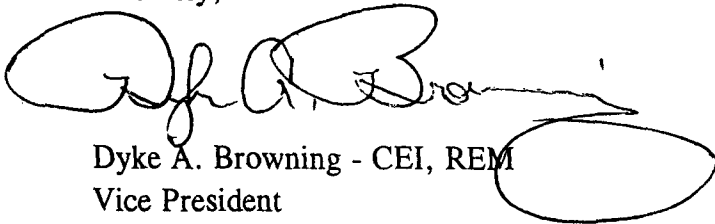
I arrived onsite at 9:00 am and met with Mr. Kenneth Buris. We collected numerous grab samples inside the firewall around the recent stain. These samples were composited and submitted to a third party laboratory (Cardinal) for TPH (Total Petroleum Hydrocarbon) analysis.

The bermed area containing the spoils from the excavation of the recent leak was then gridded and random numbers were generated to determine sample points. Ten grab samples at the pre-determined sample points were collected and submitted to a third party laboratory (Cardinal) for TCLP (Toxicity Characteristic Leaching Procedure) volatiles, semi-volatiles, metals, TPH, and BTEX.

The appropriate paperwork was completed and the samples were preserved on ice and immediately transported to the laboratory. Results should be forthcoming.

If you have any questions, or we can be of further service, please do not hesitate to call.

Sincerely,



Dyke A. Browning - CEI, REM
Vice President

HOBBBS
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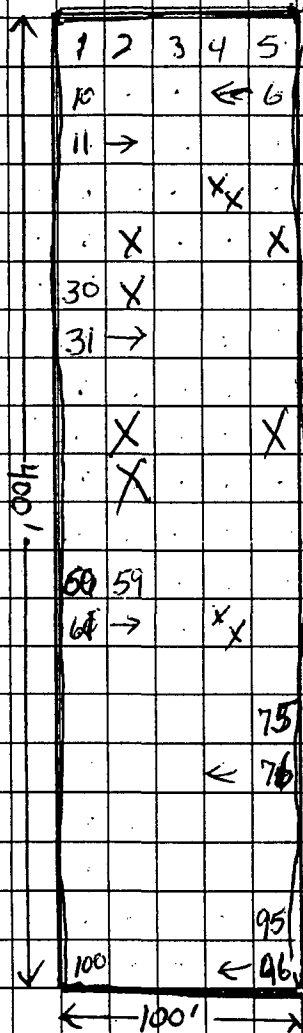
Safety & Environmental Solutions, Inc.

Sampling Site Map

Date

Location

Purpose



* Random numbers generated onsite by 20' grid.

X 10 samples (grab) collected at indicated points.

North

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Sample Description

Remarks

Technician

703 E. Clinton, Suite 103, Hobbs, New Mexico 88240
(505)397-0510

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Dike Browning

Phone #: 397-0510

FAX#: 393-4385

Company Name & Address:

Koch

प्रा. २५५५

Project Name:

H2649-1,2

Couch Station

Locality:

South of Livingston NM

Sample Statement

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX					PRESERVATIVE METHOD					SAMPLING		BTX 8020/5030	TPH 418.1	TCLP Metals Ag As	Total Metals Ag As	TCLP Volatiles	TCLP Semi Volatiles	TDS	RCI
				WATER	SOIL	AIR	SLUDGE	OTHER	HCL	HNO3	ICE	NONE	OTHER	DATE	TIME								
1	Random Composite inside																						
	Derm 11/19/96 DTD	1	12oz	X						X						11/19/96	9:03		X				
2	Random Composite of spoils Pile	1	12oz	X						X						11/19/96	10:00	X	X	X	X	X	
								</															

Relingwshoddy

Date: ,

Times:

Received by:

REMARKS

1

11/1
96

10:23am

1

filled in by:

Date: _____

Track:

Retrieved by:

Reviewed by:

Date:

Notes:

Received by Laboratory:

Sampling witnessed by
Kenneth Burns

JOHN PUGHES
OFFICE
FEB 25 1967
RECEIVED

Office I - (505) 336-0100
J. Box 1940
Hobbs, NM 88241-1980
District II - (505) 748-1283
11 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

5601 SF 4/12/96

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 4/18/95

Submit Original
Plus 1 Copy
to appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Verbal Approval Received: Yes ☐ No ☐	4. Generator Jarrel Services
2. Management Facility Destination <u>Gandy Marley Landfarm</u>	5. Originating Site <u>Hobbs Yd.</u>
3. Address of Facility Operator <u>Box 1658 Roswell</u>	6. Transporter <u>Valley Const.</u>
7. Location of Material (Street Address or ULSTR) <u>1309 W. Marland</u>	8. State <u>N.M.</u>
9. <u>Circle One</u> : A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. ☒ All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

contaminated soils from yard

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OIL HOBBS
OFFICE

Estimated Volume 60 cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Bill Marley TITLE: V-P DATE: 4-11-96
Waste Management Facility Authorized Agent
TYPE OR PRINT NAME: Bill Marley TELEPHONE NO. 625-9206

(This space for State Use)

APPROVED BY: [Signature] TITLE: Environ Engr DATE: 4/12/96

APPROVED BY: [Signature] TITLE: GEOLOGIST DATE: 4/23/96

GANDY MARLEY, INC.
P. O. BOX 827
TATUM, NEW MEXICO 88267
TATUM, NEW MEXICO ROSWELL, NEW MEXICO

CERTIFICATE OF WASTE STATUS

OILFIELD NON-EXEMPT WASTE MATERIAL

Originating Location: Jarrel Services
1309 W Marland Hobbs, N.M.

Source: contaminated soils from yard

Disposal Location: Gandy Marley Landfarm (711-01-0020)
P.O. Box 1658 Roswell N.M. 88202

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for Jarrel Services
concur with the status of the waste from the subject site.

Name Lee J. J.

Title/Agency Jarrel Services

Address 1309 W. Marland

Hobbs, N.M.

Signature _____

Date _____

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OFFICE



THE REPRODUCTION OF

THE

FOLLOWING

DOCUMENT (S)

CANNOT BE IMPROVED

DUE TO

THE CONDITION OF

THE ORIGINAL

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

TRACE ANALYSIS, INC.

March 21, 1996

Receiving Date: 03/20/96

Sample Type: Soil

Project No: NA

Project Location: Hobbs

ANALYTICAL RESULTS FOR

GMI, INC.

Attention: Bill Marley

P. O. Box 1658

Roswell, NM 88201

Prep Date: 03/20/96

Analysis Date: 03/20/96

Sampling Date: 03/19/96

Sample Condition: Intact & Cool

Sample Received by: ML

Project Name: Jarrell Services

Yard

TA#	Field Code	TRPHC (mg/kg)	MTBE (mg/kg)	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL- BENZENE (mg/kg)	M,P,O XYLENE (mg/kg)	TOTAL BTX (mg/kg)
T49782	JS - 1	11,400	<0.050	<0.050	0.111	0.131	0.624	0.866
QC	Quality Control	99	0.108	0.102	0.112	0.110	0.220	

Reporting Limit

RPD

% Extraction Accuracy

% Instrument Accuracy

3	6	4	5	5
98	89	113	125	125
100	109	102	110	110

METHODS: EPA SW 846-8020, 5030, 3550 HIGH LEVEL; EPA 418.1.

MTBE/BTEX SPIKE: 2.500 mg/kg MTBE/BTEX.

TRPHC SPIKE: 250 mg/kg TRPHC.

TRPHC QC: 100 mg/L TRPHC.

MTBE/BTEX QC: 0.100 mg/L MTBE/BTEX.



Director, Dr. Blair Leftwich

Director, Dr. Bruce McDonnell

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OCLETTUBBS
OFFICE

3-21-96

Date

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Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
GMT, Inc.
Attention: Bill Marley
P. O. Box 1658
Roswell, NM 88201

March 29, 1996
Receiving Date: 03/20/96
Sample Type: Soil
Project No: NA
Project Location: Hobbs, NM

Extraction Date: 03/22/96
Analysis Date: 03/25/96
Sampling Date: 03/19/96
Sample Condition: I & C
Sample Received by: ML
Project Name: Jarrell Services
Yard

TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T49782 JS-1	QC	RPD	%EA	%IA
Vinyl chloride	0.20	0.05	ND	0.105	4	114	105
1,1-Dichloroethene	0.70	0.05	ND	0.106	3	119	106
Methyl Ethyl Ketone	200.0	0.05	ND	0.104	1	99	104
Chloroform	6.00	0.05	ND	0.108	1	109	108
1,2-Dichloroethane	0.50	0.05	ND	0.114	3	112	114
Benzene	0.50	0.05	ND	0.108	1	99	108
Carbon Tetrachloride	0.50	0.05	ND	0.105	3	109	105
Trichloroethene	0.50	0.05	ND	0.105	3	106	105
Tetrachloroethene	0.70	0.05	ND	0.099	4	98	99
Chlorobenzene	100.00	0.05	ND	0.102	0	96	102
1,4-Dichlorobenzene	7.50	0.05	ND	0.102	2	92	102
SURROGATES							
	% Recovery						
Dibromofluoromethane	113						
Toluene-d8	108						
4-Bromofluorobenzene	111						

ND = Not Detected

METHODS: EPA SW 846-1311, 8260.

BS
Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

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OFFICE

3-29-96
DATE

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

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Lubbock Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
GMI, INC.
Attention: Bill Marley
P. O. Box 1658
Roswell, NM 88201

March 29, 1996
Receiving Date: 03/20/96
Sample Type: Soil
Project No: NA
Project Location: Hobbs, NM

Extraction Date: 03/20/96
Analysis Date: 03/22/96
Sampling Date: 03/19/96
Sample Condition: I & C
Sample Received by: ML
Project Name: Jarrell
Services Yard

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T49782 JS-1	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	107	70	44	107
1,4-Dichlorobenzene	7.5	0.05	ND	99	15	32	99
o-Cresol	200.0	0.05	ND	106	9	68	106
m,p-Cresol	200.0	0.05	ND	102	7	130	102
Total Cresol	200.0	0.05	ND	---	---	---	---
Hexachloroethane	3.0	0.05	ND	105	19	25	105
Nitrobenzene	2.0	0.05	ND	107	5	70	107
Hexachlorobutadiene	0.5	0.05	ND	100	21	22	100
2,4,6-Trichlorophenol	2.0	0.05	ND	96	6	72	96
2,4,5-Trichlorophenol	400.0	0.05	ND	101	2	82	101
2,4-Dinitrotoluene	0.13	0.05	ND	100	2	81	100
2,4-D	10.0	0.05	ND	105	26	4	105
Hexachlorobenzene	0.13	0.05	ND	101	3	85	101
2,4,5-TP	1.0	0.05	ND	104	0	10	104
Pentachlorophenol	100.0	0.05	ND	100	10	75	100
Chlordane	0.03	0.001	ND	0.044	7	112	88
Toxaphene	0.5	0.05	ND	1.87	16	116	94
Lindane	0.4	0.001	ND	0.022	7	104	88
Heptachlor	0.008	0.001	ND	0.024	6	120	96
Heptachlor epoxide	0.008	0.001	ND	0.022	4	112	88
Total Heptachlor	0.008	0.001	ND	---	---	---	---
Endrin	0.02	0.001	ND	0.053	41	94	106
Methoxychlor	10.0	0.1	ND	0.276	51	108	110
Surrogates	% RECOVERY						
2-Fluorophenol	57						
Phenol-d6	35						
Nitrobenzene-d5	77						
2-Fluorobiphenyl	72						
2,4,6-Tribromophenol	72						
Terphenyl-d14	87						

Methods: EPA SW 846-1311, 8270, 8080.
ND - Not Detected

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

DATE

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

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UDD HOBBS
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3-29-96

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue
Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

ANALYTICAL RESULTS FOR
GMI, INC.

Attention: Bill Marley
P. O. Box 1658
Roswell, NM 88201

March 29, 1996

Receiving Date: 03/20/96

Sample Type: Soil

Project No: NA

Project Location: Hobbs, NM

Extraction Date: 03/20/96

Analysis Date: 03/22/96

Sampling Date: 03/19/96

Sample Condition: Intact & Cool

Sample Received by: ML

Project Name: Jarrell Services Var

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cd	Cr	Pb	Ag	Ba	Hg
EPA LIMIT =									
T49782	JS-1	5.0	1.0	1.0	5.0	5.0	5.0	100.0	0.20
QC	Quality Control	0.4	<0.2	<0.1	<0.1	0.2	<0.01	<1.0	<0.01
		3.49	3.97	0.09	0.4	0.95	0.08	40.2	0.050
Reporting Limit									
		0.1	0.2	0.1	0.1	0.1	0.01	1.0	0.01
RPD		1	1	2	0	2	2	0	0
% Extraction Accuracy		97	111	97	108	96	111	98	98
% Instrument Accuracy		87	99	91	99	95	78	91	100

METHODS: EPA SW 846-1311, 6010, 7470.

TCLP METALS SPIKE: 8.0 mg/L As, Se, Ba; 0.8 mg/L Cr; 0.2 mg/L Cd, Ag; 2.0 mg/L Pb; and 0.050 mg/L Hg.

TCLP METALS QC: 4.0 mg/L As, Se, 0.1 mg/L Cd, Ag; 0.4 mg/L Cr; 1.0 mg/L Pb; 44 mg/L Ba; 0.050 mg/L Hg.

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3-29-96

APR 12 1996

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonnell

Date

U.S. ENVIRONMENTAL
PROTECTION
OFFICE

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue

Lubbock, Texas 79424

806-794-1296

FAX 806-794-1298

ANALYTICAL RESULTS FOR GHI, INC.

Attention: Bill Marley
P. O. Box 1658
Roswell, NM 88201

March 29, 1996
Receiving Date: 03/20/96
Sample Type: Soil
Project No: NA
Project Location: Hobbs, NM

Prep Date: 03/21/96
Analysis Date: 03/21/96
Sampling Date: 03/19/96
Sample Condition: Intact & Cool
Sample Received by: ML
Project Name: Jarrell Services Yard

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	IGNITABILITY
T49782	EPA Limits -	---	500	250	>6.5 mm/yr	<2	>140°F
	JS-1	Non-reactive	<10	<2.5	Non-corrosive	8.3	Nonignitable
	Quality Control	---	---	---	---	7.0	---
RPD		0	0	0	0	0	0
Extraction Accuracy		---	---	---	---	---	---
Instrument Accuracy		---	---	---	---	100	---

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METHODS: EPA SW 846-2.1.3, 2.1.2, 2.1.1.

APR 11 1996

JOHN HUBBS
OFFICE

3-29-96

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonnell

DATE

District I - (505) 393-6161
P.O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 8/8/95

Submit Original
Plus 1 Copy
to appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator <u>Koch Oil Co.</u>
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site <u>Anderson Ranch</u>
2. Management Facility Destination <u>GANDY MARLEY</u>	6. Transporter <u>Valley</u>
3. Address of Facility Operator <u>PO Box 1658 Roswell</u>	8. State <u>N.M.</u>
7. Location of Material (Street Address or ULSTR)	
9. <u>Circle One</u> : A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. <u>B.</u> All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Crude Oil from ruptured unloading line

SEE ATTACHMENT FOR
BENZENE RESULTS!
H

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APR 12 1996

OLD HOBBS
OFFICE

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APR 04 1996

OLD HOBBS
OFFICE

Estimated Volume 60 cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Bill Marley TITLE: V.P. DATE: 4/3/96
Waste Management Facility Authorized Agent
TYPE OR PRINT NAME: Bill Marley TELEPHONE NO. _____

(This space for State Use)
APPROVED BY: [Signature] TITLE: Field Manager DATE: 4/12/96
APPROVED BY: [Signature] TITLE: GEOLOGIST DATE: 4-23-96



COMMERCIAL LAND FARMS

*A New Mexico Enterprise
Serving New Mexico's Needs*

April 11, 1996

Mr. Wayne Price
New Mexico Oil Conservation Division
P.O. Box 940
Hobbs, N.M. 88240

RE: Koch Oil Co.
Anderson Ranch Station

Dear Mr. Price

GMI has taken a second analysis from the Anderson Ranch Station due to the results from the first analytical results from a fresh oil spill. The second analysis is a composite sample taken from the station. We hope that this clears any questions on the subject.

Please call if we can be of any futher help.

Sincerly,

A handwritten signature in black ink, appearing to read "Bill Marley".

Bill Marley

RECEIVED

**APR 12 1996
JCD HOBBS
OFFICE**

Mar-27-96 11:19A

P.01

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

ANALYTICAL RESULTS FOR
GMI, INC.
Attention: Bill Marley
P. O. Box 1658
Roswell, NM 88201

March 26, 1996
Receiving Date: 03/20/96
Sample Type: Soil
Project No: NA
Project Location: Lea County

Extraction Date: 03/21/96
Analysis Date: 03/22/96
Sampling Date: 03/19/96
Sample Condition: 1 & C
Sample Received by: ML
Project Name: Koch Oil Co.
Hobbs Anderson Ranch
Star 507

TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T49781 Koch 507	QC	RPD	SEA	VIA
Benzene	0.50	0.05	0.14	0.099	2	96	99

SURROGATES	% Recovery
Dibromofluoromethane	110
Toluene-d8	107
4-Bromofluorobenzene	113

SEE ATTACHED
LETTER! 4/11/96
TO PRR FROM MANLEY!

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APR 04 1996

OLD HOBBS
OFFICE

METHODS: EPA SW 846-1311, 8260.

FB

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

3-26-96
DATE

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

GANDY MARLEY, INC.
P. O. BOX 827
TATUM, NEW MEXICO 88267
TATUM, NEW MEXICO ROSWELL, NEW MEXICO

CERTIFICATE OF WASTE STATUS

OILFIELD NON-EXEMPT WASTE MATERIAL

Originating Location: ANDERSON Ranch

Source: CRUDE OIL From Ruptured UNLOADING HOSE

Disposal Location: Gandy - Marley

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for Koch Oil Company
concur with the status of the waste from the subject site.

Name PAUL L. HOLLAND

Title/Agency TEAM LEADER / DIST # 35

Address 2121 FRENCH DR - 16885, NM.
88240

Signature Paul L. Holland

Date 3-19-96

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JUD HUBBS
OFFICE

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

Benzine RC I

ANALYTICAL RESULTS FOR
KOCH OIL CO.
Attention: Paul Holland
2121 French Drive
Hobbs, NM

March 12, 1996
Receiving Date: 03/02/96
Sample Type: Soil
Project No: Station 507
Project Location: Lea County, N. Mex

Extraction Date: 03/06/96
Analysis Date: 03/07/96
Sampling Date: 03/01/96
Sample Condition: I & C
Sample Received by: McD
Project Name: Anderson Ranch

TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T49074 (Dark) #1	QC	RPD	%EA	%IA
Vinyl chloride	0.20	0.001	ND	0.108	13	110	108
1,1-Dichloroethene	0.70	0.001	ND	0.104	6	105	104
Methyl Ethyl Ketone	200.0	0.010	ND	0.109	7	104	109
Chloroform	6.00	0.001	ND	0.098	13	102	98
1,2-Dichloroethane	0.50	0.001	ND	0.095	10	100	95
Benzene	0.50	0.001	ND	0.101	11	100	101
Carbon Tetrachloride	0.50	0.001	ND	0.088	17	90	88
Trichloroethene	0.50	0.001	ND	0.098	12	95	98
Tetrachloroethene	0.70	0.001	ND	0.096	12	101	96
Chlorobenzene	100.00	0.001	ND	0.100	11	102	100
1,4-Dichlorobenzene	7.50	0.001	ND	0.103	12	100	103

SURROGATES	% Recovery
Dibromofluoromethane	106
Toluene-d8	101
4-Bromofluorobenzene	100

ND = Not Detected

METHODS: EPA SW 846-1311, 8260.

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

DATE

*WAS RESAMPLED!
THIS SAMPLE WAS WORSE CASE
TAKEN IN LIX AREA!*

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APR 04 1996

OLD HOBBS
OFFICE

*ADVISED THEM TO
CHECK SW-846 ON
PROPER METHOD 3-15-96*

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

TRACE ANALYSIS, INC.

630 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

ANALYTICAL RESULTS FOR

KOCH OIL CO.

Attention: Paul Holland

2121 French Drive

Hobbs, NM

March 15, 1996

Receiving Date: (3/02/96

Sample Type: Soil

Project No: Station 507

Project Location: Lea County N. Mex

Extraction Date: 03/04/96

Analysis Date: 03/06/96

Sampling Date: 03/01/96

Sample Condition: Intact & Cool

Sample Received by: MCD

Project Name: Anderson Ranch

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cd	Cr	Pb	Ag	Ba	Hg
EPA LIMIT =									
T49074	(Dark) #1	5.0	1.0	1.0	5.0	5.0	5.0	100.0	0.20
QC	Quality Control	<0.1	<0.2	<0.1	<0.1	<0.1	<0.01	1.5	<0.01
		20.9	11.4	7.68	0.2	25.1	1.89	2.05	0.050

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UCC HUBB'S OFFICE

Reporting Limit

RPD	3	7	6	5	8	8	7	0
% Extraction Accuracy	101	115	96	114	95	105	98	98
% Instrument Accuracy	84	114	102	10	100	189	205	98

METHODS: EPA SW 846-1311, 6010, 7470.

TCLP METALS SPIKE: 0.050 mg/L Hg; 8.0 mg/L As, Se, Ba; 0.2 mg/L Cd, Ag; 0.8 mg/L Cr; 2.0 mg/L Pb.

TCLP METALS QC: 0.050 mg/L Hg; 25.0 mg/L As, Pb; 10.0 mg/L Se; 7.5 mg/L Cd; 2.0 mg/L Cr; 1.0 mg/L Ag, Ba.

3-15-96

Director, Dr. Blair Leftwich
Director, Dr. Bruce McConell

Date

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

March 12, 1996

Receiving Date: 03/02/96

Sample Type: Soil

Project No: Station 507

Project Location: Lea County, N. Mex

ANALYTICAL RESULTS FOR

KOCH OIL CO.

Attention: Paul Holland

2121 French Drive

Hobbs, NM

Extraction Date: 03/05/96

Analysis Date: 03/07/96

Sampling Date: 03/01/96

Sample Condition: I & C

Sample Received by: McD

Project Name: Anderson
Ranch

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T49074 (Dark) #1	QC	RPD	%EA	%IA
Pyridine	5.0	0.05	ND	102	20	52	102
1,4-Dichlorobenzene	7.5	0.05	ND	106	6	52	106
o-Cresol	200.0	0.05	ND	106	5	71	106
m,p-Cresol	200.0	0.05	ND	106	1	127	106
Total Cresol	200.0	0.05	ND	---	---	---	---
Hexachloroethane	3.0	0.05	ND	101	10	55	101
Nitrobenzene	2.0	0.05	ND	106	3	79	106
Hexachlorobutadiene	0.5	0.05	ND	102	11	60	102
2,4,6-Trichlorophenol	2.0	0.05	ND	98	5	86	98
2,4,5-Trichlorophenol	400.0	0.05	ND	103	5	91	103
2,4-Dinitrotoluene	0.13	0.05	ND	106	5	83	106
2,4-D	10.0	0.05	ND	106	65	9	106
Hexachlorobenzene	0.13	0.05	ND	108	3	90	108
2,4,5-TP	1.0	0.05	ND	102	51	19	102
Pentachlorophenol	100.0	0.05	ND	108	8	88	108
Chlordane	0.03	0.001	ND	0.055	2	88	110
Toxaphene	0.5	0.05	ND	2.10	7	75	105
Lindane	0.4	0.001	ND	0.024	4	88	96
Heptachlor	0.008	0.001	ND	0.024	4	92	96
Heptachlor epoxide	0.008	0.001	ND	0.028	6	72	112
Total Heptachlor	0.008	0.001	ND	---	---	---	---
Endrin	0.02	0.001	ND	0.045	2	108	90
Methoxychlor	10.0	0.1	ND	0.242	3	132	97
Surrogates	% RECOVERY						
2-Fluorophenol	49						
Phenol-d6	31						
Nitrobenzene-d5	90						
2-Fluorobiphenyl	90						
2,4,6-Tribromophenol	83						
Terphenyl-d14	117						

Methods: EPA SW 846-1311, 8270, 8080.

ND - Not Detected

Director, Dr. Blair Leftwich

Director, Dr. Bruce McDonell

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JOE HUBB
OFFICE

3-15-96

DATE

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

TRACE ANALYSIS, INC.

6701 Aberdear Avenue
Lubbock, Texas 79424

806-794-1296

FAX 806-794-1258

ANALYTICAL RESULTS FOR

GMI, INC.

Attention: Bill Marley

P. O. Box 1658

Roswell, NM 88201

March 26, 1996

Receiving Date: 03/20/96

Sample Type: Soil

Project No: NA

Project Location: Lea County

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OCCURRENCE OFFICE

Prep Date: 03/21/96

Analysis Date: 03/21/96

Sampling Date: 03/19/96

Sample Condition: Intact & Cool

Sample Received by: ML

Project Name: Koch Oil Co.

Hobbs Anderson Ranch Star 507

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	IGNITABILITY
-----	------------	------------	-------------------	-------------------	-------------	--------------	--------------

EPA LIMIT =

T49781 Koch 507

QC Quality Control

---	500	250	---	<2 >12.5	---
Non-reactive	<10.0	<2.5	Non-corrosive	8.5	Nonignitable
---	---	---	---	7.0	---

RPD

% Extraction Accuracy

% Instrument Accuracy

0	0	0	0	0	0
---	---	---	---	---	---
---	---	---	---	100	---

METHODS: EPA SW 846-2.1.1.3, 2.1.2, 2.1.1.1.

BS

7-26-96

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

DATE

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue

Lubbock, Texas 79424

805-794-296

FAX 806-794-1235

ANALYTICAL RESULTS FOR

KOCH OIL CO.

Attention: Paul Holland

2121 French Drive

Hobbs, NM

Prep Date: 03/02/96

Analysis Date: 03/04/96

Sampling Date: 03/01/96

Sample Condition: Intact & Cool

Sample Received by: McD

Project Name: Anderson Ranch

March 12, 1996

Receiving Date: 03/02/96

Sample Type: Soil

Project No: Station 507

Project Location: Lea County N. Mex

TA#	Field Code	TRPHC (ug/kg)	MTBE (ug/kg)	BENZENE (ug/kg)	TOLUENE (ug/kg)	ETHYL- BENZENE (ug/kg)	M, P, O XYLENE (ug/kg)	TOTAL BTEX (ug/kg)
T49074	(Dark) #1	76,600,000	<5,000	<5,000	193,000	128,000	401,000	736,700
T49075	(Light) #2	1,500,000	<50	<50	<50	<50	360	360
QC	Quality Control	100,000	98	93	90	88	294	
	Reporting Limit	10,000	50	50	50	50	50	

DISCUSSED WITH P. MANLEY - SAMPLE WAS
RETEST CASE TAKEN IN HQ AREA!

ADVISED HIM TO CHECK SW-846 TO
DETERMINE PROPER SAMPLE METHOD!

RPD

% Extraction Accuracy

% Instrument Accuracy

3
95
1003
102
985
97
934
94
904
92
884
101
98

METHODS: EPA SW 846-8020, 5030, 3550 HIGH LEVEL; EPA 418.1.

MTBE/BTEX SPIKE: 2,500 ug/kg MTBE/BTEX.

TRPHC SPIKE: 250,000 ug/kg TRPHC.

TRPHC QC: 100,000 ug/L TRPHC.

MTBE/BTEX QC: 100 ug/L MTBE/BTEX.

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

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COO HOBBS
OFFICE

Date

3-12-96

District I - (505) 393-6161
P.O. Box 1980
Tobbs, NM, 88241-1980
District II - (505) 748-1283
111 S. First
Artesia, NM 88210
District III - (505) 334-6178
000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department

Oil Conservation Division

2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 8/8/95

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Plus 1 Copy
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District Office

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REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Verbal Approval Received: Yes ☐ No ☐	4. Generator <u>Koch Oil Co</u>
2. Management Facility Destination <u>GANDY Marley</u>	5. Originating Site <u>19S 32E</u>
3. Address of Facility Operator <u>PO Box 1658 Roswell</u>	6. Transporter <u>Valley Const.</u>
7. Location of Material (Street Address or ULSTR)	8. State <u>New Mexico</u>
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Crude Oil from Tank Overflows at Station

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JOJO HOBBS
OFFICE

Estimated Volume 200 est. cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Bill Malley TITLE: V.P. DATE: 3/19/96
Waste Management Facility Authorized Agent
TYPE OR PRINT NAME: Bill Malley TELEPHONE NO. 626-6513

(This space for State Use)

APPROVED BY: [Signature] TITLE: FRAN FISH DATE: 3/19/96

APPROVED BY: [Signature] TITLE: GEOLOGIST DATE: 3/22/96

GANDY MARLEY, INC.
P. O. BOX 827
TATUM, NEW MEXICO 88267
TATUM, NEW MEXICO ROSWELL, NEW MEXICO

CERTIFICATE OF WASTE STATUS

OILFIELD NON-EXEMPT WASTE MATERIAL

Originating Location: LYNCH STATION

Source: CRUDE OIL FROM TANK OVER FLOWS AT STATION

Disposal Location: GANDY-MARLEY

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for KOCH OIL COMPANY
concur with the status of the waste from the subject site.

Name PAUL L HOLLAND

Title/Agency TEAM LEADER / DIST #35

Address 2121 FRENCH DR. - 16885 NM
88240

Signature Paul L Holland

Date 3-19-96

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OFFICE

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
GANDY MARLEY
P. O. Box 1658
Roswell, NM 88202

March 5, 1996
Receiving Date: 02/24/96
Sample Type: Soil
Project No: NA
Project Location: Lea County, NM

Extraction Date: 02/28/96
Analysis Date: 02/29/96
Sampling Date: 02/23/96
Sample Condition: I & C
Sample Received by: DH
Project Name: Koch Oil
Lynch Station

TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T48624 Soil Sample	QC	RPD	%EA	%IA
Vinyl chloride	0.20	0.05	ND	0.117	6	107	117
1,1-Dichloroethene	0.70	0.05	ND	0.111	9	107	111
Methyl Ethyl Ketone	200.0	0.5	ND	0.113	3	105	113
Chloroform	6.00	0.05	ND	0.108	6	110	108
1,2-Dichloroethane	0.50	0.05	ND	0.107	4	102	107
Benzene	0.50	0.05	ND	0.108	2	106	108
Carbon Tetrachloride	0.50	0.05	ND	0.089	2	94	89
Trichloroethene	0.50	0.05	ND	0.108	2	102	108
Tetrachloroethene	0.70	0.05	ND	0.103	3	106	103
Chlorobenzene	100.00	0.05	ND	0.105	4	105	105
1,4-Dichlorobenzene	7.50	0.05	ND	0.108	2	104	108

SURROGATES	% Recovery
Dibromofluoromethane	109
Toluene-d8	88
4-Bromofluorobenzene	92

ND = Not Detected

METHODS: EPA SW 846-1311, 8260.

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3-5-96

DATE

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
GANDY MARLEY
P. O. Box 1656
Roswell, NM 88202

March 5, 1996
Receiving Date: 02/24/96
Sample Type: Soil
Project No: NA
Project Location: Lea County, NM

Extraction Date: 02/26/96
Analysis Date: 03/01/96
Sampling Date: 02/23/96
Sample Condition: I & C
Sample Received by: DH
Project Name: Lynch Stn.
KOCH Oil

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T48624 Soil	QC	RPD	%EA	%IA
Pyridine	5.0	0.25	ND	109	38	53	109
1,4-Dichlorobenzene	7.5	0.25	ND	94	6	55	94
o-Cresol	200.0	0.25	ND	105	5	76	105
m,p-Cresol	200.0	0.25	ND	101	12	122	101
Total Cresol	200.0	0.25	ND	---	---	---	---
Hexachloroethane	3.0	0.25	ND	92	11	55	92
Nitrobenzene	2.0	0.25	ND	89	5	73	89
Hexachlorobutadiene	0.5	0.25	ND	83	14	53	83
2,4,6-Trichlorophenol	2.0	0.25	ND	99	6	87	99
2,4,5-Trichlorophenol	400.0	0.25	ND	90	7	89	90
2,4-Dinitrotoluene	0.13	0.05	ND	89	6	84	89
2,4-D	10.0	0.25	ND	96	47	10	96
Hexachlorobenzene	0.13	0.05	ND	87	3	80	87
2,4,5-TP	1.0	0.25	ND	91	37	20	91
Pentachlorophenol	100.0	0.25	ND	85	8	87	85
Chlordane	0.03	0.001	ND	0.051	2	88	102
Toxaphene	0.5	0.05	ND	1.81	7	75	91
Lindane	0.4	0.001	ND	0.025	4	88	100
Heptachlor	0.008	0.001	0.001	0.025	4	92	100
Heptachlor epoxide	0.008	0.001	ND	0.026	6	72	104
Total Heptachlor	0.008	0.001	0.001	---	---	---	---
Endrin	0.02	0.001	ND	0.045	2	108	90
Methoxychlor	10.0	0.1	ND	0.214	3	132	86
Surrogates	% RECOVERY						
2-Fluorophenol	72						
Phenol-d6	60						
Nitrobenzene-d5	78						
2-Fluorobiphenyl	90						
2,4,6-Tribromophenol	72						
Terphenyl-d14	103						

Methods: EPA SW 846-1311, 8270, 8080.
ND - Not Detected

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MAR 18 1996

U.S. ARMY
OFFICE

3-5-96

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

DATE

TRACE ANALYSIS, INC.

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue
Lubbock, Texas 79424

806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
GANDY MARLEY
P. O. Box 1658
Roswell, NM 88202

March 5, 1996
Receiving Date: 02/24/96
Sample Type: Soil
Project No: NA
Project Location: Lea Co., NM

Extraction Date: 02/26/96
Analysis Date: 02/29/96
Sampling Date: 02/23/96
Sample Condition: Intact
Sample Received by: DH
Sample Name: KOCH Oil
Project Name: Lynch Station

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cd	Cr	Pb	Ag	Ba	Hg
748624	Soil Sample	5.0	1.0	1.0	5.0	5.0	5.0	100.0	0.20
QC	Quality Control	<0.1	<0.2	<0.1	<0.1	<0.1	<0.01	<1.0	<0.01
		25.7	11.2	7.75	2.17	25.2	0.97	1.03	0.050
		0.1	0.2	0.1	0.1	0.1	0.01	1.0	0.01
		7	4	3	6	4	4	5	4
		110	119	107	120	101	112	108	94
		103	112	103	109	101	97	103	100

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OFFICE

RPD
% Extraction Accuracy
% Instrument Accuracy

METHODS: EPA SW 846-1311, 6010, 7470.
TCLP METALS SPIKE: 8.0 mg/L As, Se, Ba; 0.8 mg/L Cr; 0.2 mg/L Cd, Ag; 2.0 mg/L Pb; and 0.050 mg/L Hg.
TCLP METALS QC: 25.0 mg/L As, Pb; 10.0 mg/L Se; 7.5 mg/L Cd; 2.0 mg/L Cr; 1.0 mg/L Ag, Ba; 0.050 mg/L Hg.

3-5-96
Date

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonnell

TRACE ANALYSIS, INC.

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

6701 Aberdeen Avenue

ANALYTICAL RESULTS FOR

GANDY MARLEY

P. O. Box 1658

Roswell, NM 88202

March 5, 1996

Receiving Date: 02/24/96

Sample Type: Soil

Project No: NA

Project Location: Lea County, NM

Prep Date: 02/28/96
Analysis Date: 02/28/96
Sampling Date: 02/23/96
Sample Condition: Intact & Cool
Sample Received by: DH
Project Name: KOCH Oil
Lynch Station

PH
(a.u.)

CORROSIVITY

CYANIDES
(mg/kg)

SULFIDES
(mg/kg)

REACTIVITY

Field Code

Soil Sample
Quality Control

TA#

T48624

QC

Non-ignitable

7.3

7.0

Non-corrosive

<2.5

<10.0

Non-reactive

RPD
% Extraction Accuracy
% Instrument Accuracy

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METHODS: EPA SW 846-2.1.3, 2.1.2, 2.1.1.

JOHN HUBBS
OFFICE

3-5-96

DATE

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonnell

District I - (505) 393-6161
P.O. Box 340
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 4/18/95

OIL CONSERVATION DIVISION
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Submit Original
Plus 1 Copy
to appropriate
District Office
'96 MAR 19 AM 8 50

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ <i>GROUP BY LWP/RF 3/18/96 3:45PM</i>	4. Generator Unichem
Verbal Approval Received: Yes ☒ No ☐	5. Originating Site Hobbs Yard
2. Management Facility Destination G M Inc. Landfarm	6. Transporter Gandy Corp.
3. Address of Facility Operator box 1658 Roswell	8. State N. M. 88202
7. Location of Material (Street Address or ULSTR) 715 N. Leach	Hobbs, N. M. 88241
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. (B) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

contaminated soils from under parking lot

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OIL HOBBS
OFFICE

Estimated Volume 300 cy Known Volume (to be entered by the operator at the end of the haul) cy

SIGNATURE: Larry Gandy TITLE: V-P DATE: 3-18-96
Waste Management Facility Authorized Agent
TYPE OR PRINT NAME: Larry Gandy TELEPHONE NO. 398-4960

(This space for State Use)		
APPROVED BY: <u>[Signature]</u>	TITLE: <u>Engr Engr</u>	DATE: <u>3/18/96</u>
APPROVED BY: <u>[Signature]</u>	TITLE: <u>GEOLOGIST</u>	DATE: <u>3/19/96</u>

GANDY MARLEY, INC.
P. O. BOX 827
TATUM, NEW MEXICO 88267
TATUM, NEW MEXICO ROSWELL, NEW MEXICO

CERTIFICATE OF WASTE STATUS

OILFIELD NON-EXEMPT WASTE MATERIAL

Originating Location: Unichem Chemical
715 N. Laech Hobbs, N.M. 88201

Source: contaminated soils from parking lot

Disposal Location: GM Inc. Landfarm (711-1-0020)

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for Unichem
concur with the status of the waste from the subject site.

Name Wesley Johnston

Title/Agency Const. + Mgt. Mgt.

Unichem

Address 707 N Laech

Signature Wesley Johnston

Date 3-18-96

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MAR 18 1996

OLD HOBBS
OFFICE

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
B. J. UNICHEM
Attention: Wes Johnston
707 N. Leech
Hobbs, NM 88240

December 18, 1995
Receiving Date: 12/15/95
Sample Type: Soil
Project No: DP-95
Project Location: Hobbs, NM

Prep Date: 12/15/95
Analysis Date: 12/15/95
Sampling Date: 12/14/95
Sample Condition: Intact & Cool
Sample Received by: ML
Project Name: Dirt Pile

TA#	FIELD CODE	TRPHC (mg/kg)
T45694	Stockpile	2,890 —
QC	Quality Control	103
Reporting Limit		10
RPD		4
% Extraction Accuracy		99
% Instrument Accuracy		103

METHODS: EPA SW 846-3550 HIGH LEVEL; EPA 418.1.
TRPHC SPIKE: 250 mg/kg TRPHC.
TRPHC QC: 100 mg/L TRPHC.

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MAR 18 1996

JCD HOBBS
OFFICE

12-18-95

DATE



Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell


TRACEANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

ANALYTICAL RESULTS FOR

B. J. UNICHEM

Attention: Wes Johnston

707 N. Leech

Hobbs, NM 88240

January 02, 1996

Receiving Date: 12/15/95

Sample Type: Soil

Project No: DP-95

Project Location: Hobbs, NM

Prep Date: 12/19/95

Analysis Date: 12/19/95

Sampling Date: 12/14/95

Sample Condition: Intact & Cool

Sample Received by: ML

Project Name: Dirt Pile

TA#	Field Code	REACTIVITY	SULFIDES (mg/kg)	CYANIDES (mg/kg)	CORROSIVITY	pH (s.u.)	IGNITABILITY
-----	------------	------------	---------------------	---------------------	-------------	--------------	--------------

T45694	Stockpile	Non-reactive	<10.0	<2.5	Non-corrosive	8.0	Nonignitable
QC	Quality Control	---	---	---	---	7.0	---

RPD

% Extraction Accuracy

% Instrument Accuracy

0	0	0	0	0	0	0
---	---	---	---	---	---	---
---	---	---	---	---	---	100

METHODS: EPA SW 846-2.1.3, 2.1.2, 2.1.1.

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MAR 18 1996

UDD HOBBS
OFFICE

BZ

DATE

1-2-96

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonnell

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

ANALYTICAL RESULTS FOR

B. J. UNICHEM

Attention: Wes Johnston

707 N. Leech

Hobbs, NM 88240

January 02, 1996

Receiving Date: 12/15/95

Sample Type: Soil

Project No: DP-95

Project Location: Hobbs, NM

Extraction Date: 12/19/95

Analysis Date: 12/26/95

Sampling Date: 12/14/96

Sample Condition: Intact & Cool

Sample Received by: ML

Project Name: Dirt Pile

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cr	Cd	Pb	Ag	Ba	Hg
EPA LIMIT =									
T45694	Stockpile	5.0	1.0	5.0	1.0	5.0	5.0	100.0	10
QC	Quality Control	0.27	0.15	<0.05	<0.02	<0.1	<0.01	1.2	0.1
		5.1	4.9	5.3	5.1	5.1	1.1	5.2	0.1
Reporting Limit									
		0.1	0.1	0.05	0.02	0.1	0.01	0.2	0.01
RPD		2	0	6	0	6	6	4	0
% Extraction Accuracy		108	113	83	75	113	93	109	102
% Instrument Accuracy		102	98	105	102	103	105	103	100

METHODS: EPA SW 846-1311, 6010, 7470.

TCLP METALS SPIKE: 8.0 mg/L As, Se, Ba; 0.8 mg/L Cr; 0.2 mg/L Cd, Ag; 2.0 mg/L Pb; and 0.050 mg/L Hg.

TCLP METALS QC: 5.0 mg/L As, Se, Cr, Cd, Pb, Ba; 1.0 mg/L Ag; 0.050 mg/L Hg.

Director, Dr. Blair Leftwich
 Director, Dr. Bruce McDonell

Date

/- 2-98

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 OFFICE

6701 Aberdeen Avenue
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ANALYTICAL RESULTS FOR
B. J. UNICHEM
Attention: Wes Johnston
707 N. Leech
Hobbs, NM 88240

January 02, 1996
Receiving Date: 12/15/95
Sample Type: Soil
Project No: DP-95
Project Location: Hobbs, NM

Extraction Date: 12/27/95
Analysis Date: 12/28/95
Sampling Date: 12/14/95
Sample Condition: I & C
Sample Received by: ML
Project Name: Dirt Pile

TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T45694 Stockpile	QC	RPD	%EA	%IA
Vinyl chloride	0.20	0.05	ND	0.106	3	121	106
1,1-Dichloroethene	0.70	0.05	ND	0.098	4	110	98
Methyl Ethyl Ketone	200.0	0.5	ND	0.100	12	162	100
Chloroform	6.00	0.05	ND	0.099	3	94	99
1,2-Dichloroethane	0.50	0.05	ND	0.105	3	78	105
Benzene	0.50	0.05	ND	0.098	5	93	98
Carbon Tetrachloride	0.50	0.05	ND	0.099	3	105	99
Trichloroethene	0.50	0.05	ND	0.092	5	90	92
Tetrachloroethene	0.70	0.05	ND	0.092	3	103	92
Chlorobenzene	100.00	0.05	ND	0.100	4	92	100
1,4-Dichlorobenzene	7.50	0.05	ND	0.102	3	94	102

SURROGATES	% Recovery
Dibromofluoromethane	110
Toluene-d8	108
4-Bromofluorobenzene	101

ND = Not Detected

METHODS: EPA SW 846-1311, 8260.

RECEIVED

MAR 18 1996

JOE HOBBS
OFFICE

1-2-96

DATE

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

ANALYTICAL RESULTS FOR
B. J. UNICHEM
Attention: Wes Johnston
707 N. Leech
Hobbs, NM 88240

January 02, 1996

Receiving Date: 12/15/95

Sample Type: Soil

Project No: DP-95

Project Location: Hobbs, NM

Extraction Date: 12/17/95

Analysis Date: 12/19/95

Sampling Date: 12/14/95

Sample Condition: I & C

Sample Received by: ML

Project Name: Dirt File

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit	T45694 Stockpile	QC	RPD	%EA	%IA
Pyridine	5.0	0.5	ND	108	14	68	108
1,4-Dichlorobenzene	7.5	0.5	ND	101	10	91	101
o-Cresol	200.0	0.5	ND	106	13	106	106
m,p-Cresol	200.0	0.5	ND	99	3	130	99
Total Cresol	200.0	0.5	ND	---	---	---	---
Hexachloroethane	3.0	0.5	ND	100	9	94	100
Nitrobenzene	2.0	0.5	ND	99	10	91	99
Hexachlorobutadiene	0.5	0.1	ND	100	10	96	100
2,4,6-Trichlorophenol	2.0	0.5	ND	99	15	99	99
2,4,5-Trichlorophenol	400.0	0.5	ND	102	21	109	102
2,4-Dinitrotoluene	0.13	0.1	ND	100	14	106	100
2,4-D	10.0	0.5	ND	119	30	19	119
Hexachlorobenzene	0.13	0.1	ND	101	10	101	101
2,4,5-TP	1.0	0.5	ND	115	27	29	115
Pentachlorophenol	100.0	0.5	ND	100	14	98	100
Chlordane	0.03	0.001	ND	0.052	6	98	104
Toxaphene	0.5	0.05	ND	2.10	36	101	105
Lindane	0.4	0.001	ND	0.024	4	104	96
Heptachlor	0.008	0.001	ND	0.025	8	108	100
Heptachlor epoxide	0.008	0.001	ND	0.027	58	108	108
Total Heptachlor	0.008	0.001	ND	---	---	---	---
Endrin	0.02	0.001	ND	0.054	0	118	108
Methoxychlor	10.0	0.1	ND	0.270	19	100	108
Surrogates	% RECOVERY						
2-Fluorophenol	90						
Phenol-d6	82						
Nitrobenzene-d5	94						
2-Fluorobiphenyl	104						
2,4,6-Tribromophenol	68						
Terphenyl-d14	110						

Methods: EPA SW 846-1311, 8270, 8080.

ND - Not Detected

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

DATE

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

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MAR 1 1996

JOHN HOBBS
OFFICE

1-2-96

6701 Aberdeen Avenue Lubbock, Texas 79424
Tel (806) 794 1296 Fax (806) 794 1298

CIAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

[illegible]

District I - (505) 393-6161
P. O. Box 740
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

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MAR 25 1996

Energy Minerals and Natural Resources Department

New Mexico
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

TO: CHRIS EUSTICE
Collect From 300 To 700 MS
3/15/96
Form C-13
Originated 4/18/95
OIL CONSERVATION DIVISION
RECEIVED
Submit Origin
Plus 1 Co
to appropriate
District Office
'96 MAR 19 AM 8 52

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ <i>CAUTION BY LWP/ET 3/18/96 3:40PM</i>	4. Generator Unichem
Verbal Approval Received: Yes ☒ No ☐	5. Originating Site Hobbs Yard
2. Management Facility Destination G M Inc. Landfarm	6. Transporter Gandy Corp.
3. Address of Facility Operator box 1658 Roswell	8. State N M 88202
7. Location of Material (Street Address or ULSTR) 715 N. Leach	Hobbs, N M 88241
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. (B) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

contaminated soils from under parking lot

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MAR 25 1996

OLD HOBBS
OFFICE

RECEIVED

RECEIVED

MAR 21 1996

OLD HOBBS
OFFICE

RECEIVED

MAR 18 1996

OLD HOBBS
OFFICE

Estimated Volume 900 300 per BM cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Larry Gandy TITLE: V-P DATE: 3-18-96
Waste Management Facility Authorized Agent
TYPE OR PRINT NAME: Larry Gandy TELEPHONE NO. 398-4960

(This space for State Use)

APPROVED BY: [Signature] TITLE: ENVIRON ENGR DATE: 3/18/96

APPROVED BY: [Signature] TITLE: GEOLOGIST DATE: 3/19/96

District I - (505) 393-6161
P. O. Box 940
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

SF 3/25/96

Form C-138
Originated 4/18/95

Submit Original
Plus 1 Copy
to appropriate
District Office

RECEIVED
MAR 26 AM 8 52

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Verbal Approval Received: Yes ☐ No ☐	4. Generator T&C Tank Rental
2. Management Facility Destination GMI Landfarm	5. Originating Site Hobbs Yard
3. Address of Facility Operator box 1658 Roswell	6. Transporter Gandy Corp
7. Location of Material (Street Address 3600 N. WEST COUNTY RD.	8. State N. M. 88202
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

contaminated soils from yard and wash pit

RECEIVED

MAR 25 1996

WCD HOBBS
OFFICE

Estimated Volume 200 cy Known Volume (to be entered by the operator at the end of the haul) cy

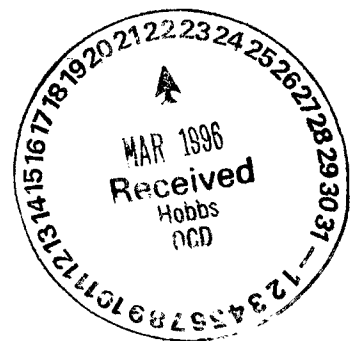
SIGNATURE: Larry Gandy TITLE: Waste Management Facility Authorized Agent DATE: 3-19-96
TYPE OR PRINT NAME: Larry Gandy TELEPHONE NO. 398-4960

(This space for State Use)

APPROVED BY: [Signature] TITLE: Engr Engr DATE: 3/25/96

APPROVED BY: [Signature] TITLE: Geologist DATE: 3-29-96

cc: MARK ASHLEY - PEG T&C - HOBBS



GANDY MARLEY, INC.
P. O. BOX 827
TATUM, NEW MEXICO 88267
TATUM, NEW MEXICO ROSWELL, NEW MEXICO

CERTIFICATE OF WASTE STATUS

OILFIELD NON-EXEMPT WASTE MATERIAL

Originating Location: T&C tank Rental & Anchor Service

3600 N. West County Rd. Hobbs, N. M. 88241

Source: contaminated soils from yard & wash pit

Disposal Location: GMI Landfarm (711-01-0020)

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for T & C Tank Rental
concur with the status of the waste from the subject site.

Name Mark Spolton

Title/Agency T & C Tank Rental & Anchor Service

Address 3600 N. West County Rd.
Hobbs. N. M. 88241

RECEIVED

MAK 4 5 1998

**JOE HOBBS
OFFICE**

Signature Mark Spolton

Date 3-19-96



CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

FINAL ANALYSIS REPORT

Company: T & C Tank Rental
 Address: PO Box 1197
 City, State: Denver City Texas 79323
 Location: Hobbs facility
 Sampled by: MS
 Sample Type: soil

Date : 03/11/96
 Lab#: H2440

Date: 03/01/96

Sample Condition: intact

Sample #1: Hobbs Yard East & West Composite

Units: mg/kg

TCLP SEMIVOLATILES

PARAMETER	RESULT
Pyridine	<0.010
1,4-Dichlorobenzene	<0.010
o-Cresol	<0.010
m,p-Cresol	<0.020
Hexachloroethane	<0.010
Nitrobenzene	<0.010
Hexachloro-1,3-butadiene	<0.010
2,4,6-Trichlorophenol	<0.010
2,4,5-Trichlorophenol	<0.010
2,4-Dinitrotoluene	<0.010
Hexachlorobenzene	<0.010
Pentachlorophenol	<0.010

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MAR 20 1996

UCC HOBBS
OFFICE

TCLP INORGANICS (Leachate)

PARAMETER	RESULT	EPA LIMIT	UNITS
Arsenic	<0.1	5	ppm
Silver	<0.1	5	ppm
Barium	0.5	100	ppm
Cadmium	<0.1	1	ppm
Chromium	<0.1	5	ppm
Mercury	<0.001	0.2	ppm
Lead	0.1	5	ppm
Selenium	<0.1	1	ppm

HAZARDOUS WASTE CHARACTERIZATION

PARAMETER	RESULT 1	UNITS
Ignitability	>140	F
(Pensky-Martens Closed Cup)		
Corrositivity (pH)	7.61	
Reactivity-S	19.8	
Reactivity-CN	1.08	mg/kg

METHODS: HWC - EPA SW 846-7.3, 7.2, 1010

PLEASE

All claims, service, in no
 affiliates or success

Garbalena

13/11/96
 Date



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2328 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4689 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

FINAL ANALYSIS REPORT

Company: T & C Tank Rental
Address: P.O. Box 1197
City, State: Denver City, Texas 79323
Project Name: not given
Location: Hobbs Facility
Sampled by: MS
Sample Type: soil

Date: 03/12/96
Lab #: H2440
Analyzed by: MG
Date Analyzed: 03/12/96

Date: 03/01/96
Sample Condition: intact

TCLP VOLATILES

<u>PARAMETER</u>	<u>RESULT</u>	<u>EPA LIMIT</u>
Benzene	<0.001	0.50
Carbon tetrachloride	<0.001	0.50
Chlorobenzene	<0.001	100.00
Chloroform	<0.001	6.00
1,2-Dichloroethane	<0.001	0.50
1,1-Dichloroethylene	<0.001	0.20
Methyl ethyl ketone	<0.001	200.00
Tetrachloroethylene	<0.001	0.70
Trichloroethylene	<0.001	0.50
Vinyl chloride	<0.001	0.20

RECEIVED

MAR 25 1996

OLD HOBBS
OFFICE

METHOD: TCLP VOLATILES - EPA SW 846-8260,1311

MG
Manuel Garbalena

3/11/96
Date

PLEASE 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 client for 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 thirty (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.

PHONE: (505) 393-2326 • 101 E. MARLAND • HOBBS, NEW MEXICO 88240

Chain of Custody Record

Project I.D.:

Project Location	Hobbs facility
------------------	----------------

Sampled By Mark Spolton

	T + C	Tank Rental
Client Name		

Address P.O. Box 1197 Denver City, TX 79323

Telephone (806) 592-3268 fax = 806 592-2

[illegible]

District I (505) 393-6161
P.O. Box 1940
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

5645P 2/23/96
TO: MRS FUSTLER
New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 4/18/95

Submit Original
Plus 1 Copy
to appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator BAKER CHEMICAL
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site LOVINGTON YARD
2. Management Facility Destination GANDY-MARLEY, INC.	6. Transporter GANDY CORPORATION
3. Address of Facility Operator BOX 1658 ROSWELL, NM 88201	8. State NEW MEXICO
7. Location of Material (Street Address or ULSTR) HWY 208, 3 miles NORTHOOF LOVINGTON	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. (B) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

CONTAMINATED MATERIALS FROM CESSPOOL

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FEB 28 1996

Environmental Bureau
Oil Conservation Division

RECEIVED

FEB 23 1996

OLD HOBBS
OFFICE

Estimated Volume 8 yards cy Known Volume (to be entered by the operator at the end of the haul) cy

SIGNATURE: Larry Gandy TITLE: VICE PRESIDENT DATE: 2-23-96
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: LARRY GANDY TELEPHONE NO. 505-398-4960

(This space for State Use)

APPROVED BY: [Signature] TITLE: ENGR ENGR DATE: 2/23/96

APPROVED BY: [Signature] TITLE: Petroleum Engineer DATE: 2/28/96

GANDY MARLEY, INC.
P. O. BOX 827
TATUM, NEW MEXICO 88267
TATUM, NEW MEXICO ROSWELL, NEW MEXICO

CERTIFICATE OF WASTE STATUS

OILFIELD NON-EXEMPT WASTE MATERIAL

Originating Location: BAKER PERFORMANCE CHEMICAL, LOVINGTON YARD

Source: CESSPOOL

Disposal Location: GANDY MARLEY, INC.

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge, no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for BAKER PERFORMANCE CHEMICALS concur with the status of the waste from the subject site.

Name John C. Cockrum

Title/Agency District manager BPC

Address 2 mi north of Overpass on
TATUM Hiway PO BOX 250
LOVINGTON N.M. 88260

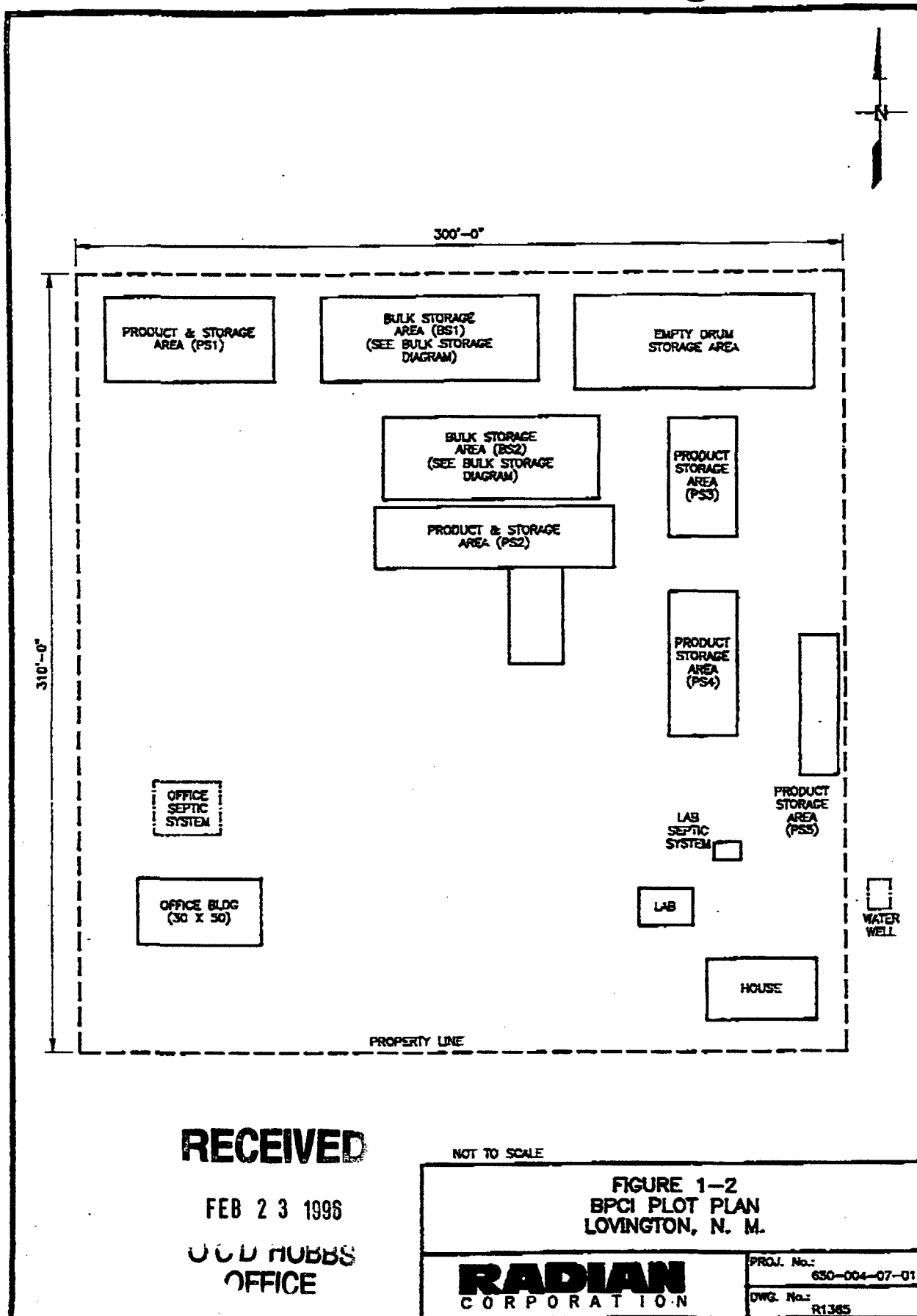
Signature John C. Cockrum

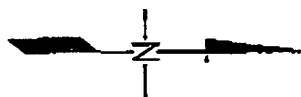
Date 2-23-96

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FEB 23 1996

OLD HUBBS
OFFICE

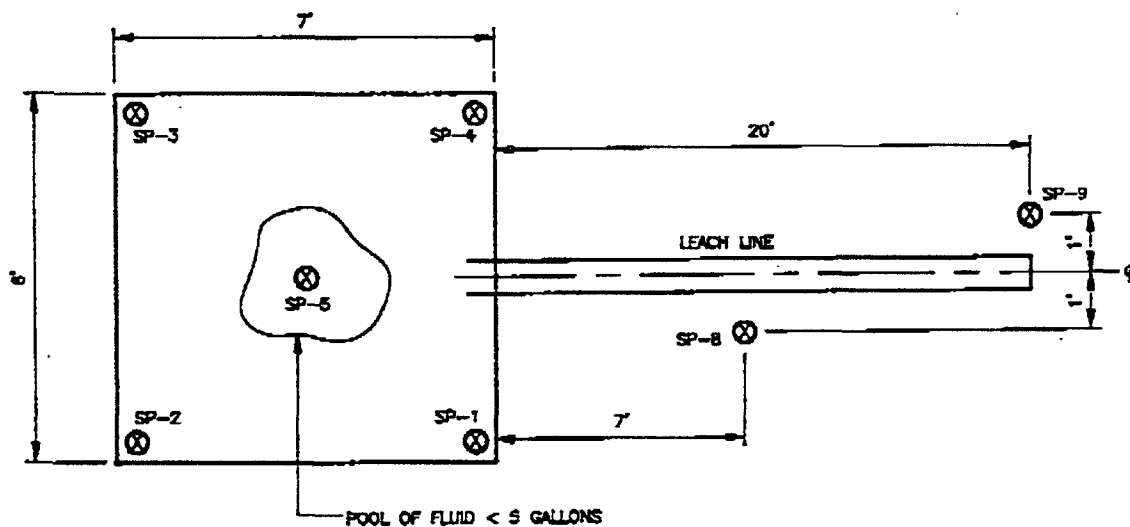




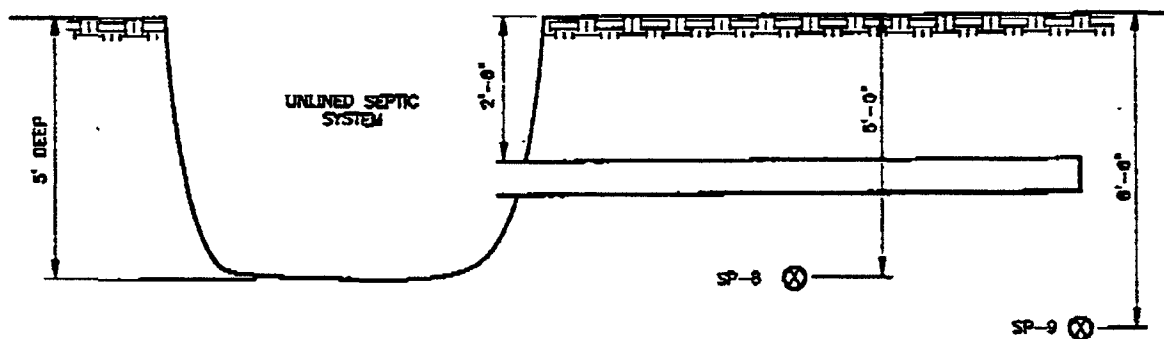
SP-6: COMPOSITE OF SP-1 THRU SP-5

SP-7: SAMPLE OF FLUIDS IN SEPTIC SYSTEM

SP-10: COMPOSITE OF SP-8 AND SP-9

PLAN VIEW**RECEIVED**

FEB 23 1988

OLD HUBBS
OFFICEX-SECTIONSLUDGE
SAMPLE DEPTH

SP-1	4'-6"
SP-2	4'-0"
SP-3	4'-0"
SP-4	4'-6"
SP-5	5'-0"

⊗ SAMPLE LOCATION

NOT TO SCALE

FIGURE 2-1
PHASE I SAMPLING LOCATIONS
LAB SEPTIC SYSTEM**RADIAN**
CORPORATION

PROJ. No.:	650-004-07-01
DWG. No.:	R1366

MES

(713) 920-2502

Mercury Environmental Services

1604 South Shaver • Pasadena, Texas 77502

November 1, 1995

Radian Corporation
11490 Westheimer #400
Houston, Texas 77077

ATTENTION: Mr. Bill Gusler

SAMPLE NUMBER: 5100596

SAMPLE I.D.: Lovington Lab Tank Project 650-004-07-02
SP-1
10-23-95 @ 1715

DATE RECEIVED: October 24, 1995 @ 1630

CERTIFICATE OF ANALYSIS

TOTAL PETROLEUM HYDROCARBONS	METHOD 3550/418.1	MDL mg/L	RESULT mg/kg	DATE/TIME/ANALYST
TPH		1	3,480	10-27-95 1300 LAB

BTEX	METHOD 8020	MDL mg/L	RESULT mg/kg	DATE/TIME/ANALYST
Benzene		0.005	< 0.5	10-28-95 1906 HDG
Toluene		0.005	< 0.5	
Ethylbenzene		0.005	< 0.5	
m+p Xylene		0.005	< 0.5	
o-Xylene		0.005	< 0.5	

RECEIVED

FEB 23 1996

OCC HUBBS
OFFICE

Signature: 
Howard W. Apfel W/ QA/QC Officer

November 1, 1995

MES

(713) 920-2502

Mercury Environmental Services

1604 South Shaver • Pasadena, Texas 77502

November 1, 1995

Radian Corporation
11490 Westheimer #400
Houston, Texas 77077

ATTENTION: Mr. Bill Gusler

SAMPLE NUMBER: 5100597

SAMPLE ID.: Lovington Lab Tank Project 650-004-07-02
SP-2
10-23-95 @ 1725

DATE RECEIVED: October 24, 1995 @ 1630

CERTIFICATE OF ANALYSIS

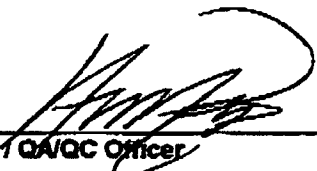
TOTAL PETROLEUM HYDROCARBONS	METHOD 3550/418.1	MDL mg/L	RESULT mg/kg	DATE/TIME/ANALYST
TPH		1	1,330	10-27-95 1305 LAB

BTEX	METHOD 8020	MDL mg/L	RESULT mg/kg	DATE/TIME/ANALYST
Benzene		0.005	< 0.5	10-28-95 1952 HDG
Toluene		0.005	< 0.5	
Ethylbenzene		0.005	< 0.5	
m+p Xylene		0.005	< 0.5	
o-Xylene		0.005	< 0.5	

RECEIVED

FEB 2 8 1996

OCC HOBBS
OFFICE

Signature: 
Howard W. Apel II QA/QC Officer

November 1, 1995

MES

(713) 920-2502

Mercury Environmental Services

1604 South Shaver • Pasadena, Texas 77502

November 1, 1995

Radian Corporation
11490 Westheimer #400
Houston, Texas 77077

ATTENTION: Mr. Bill Gusler
SAMPLE NUMBER: 5100598
SAMPLE ID.: Lovington Lab Tank Project 650-004-07-02
SP-3
10-23-95 @ 1740
DATE RECEIVED: October 24, 1995 @ 1630

CERTIFICATE OF ANALYSIS

TOTAL PETROLEUM HYDROCARBONS	METHOD 3550/418.1	MDL mg/L	RESULT mg/kg	DATE/TIME/ANALYST
TPH		1	520	10-27-95 1310 LAB

BTEX	METHOD 8020	MDL mg/L	RESULT mg/kg	DATE/TIME/ANALYST
Benzene		0.005	< 0.5	10-28-95 2038 HDG
Toluene		0.005	< 0.5	
Ethylbenzene		0.005	< 0.5	
m+p Xylene		0.005	< 0.5	
o-Xylene		0.005	< 0.5	

Signature: 
Howard W. Apfel / QA/QC Officer

November 1, 1995

RECEIVED
FEB 2 1996
OIL FIELD
OFFICE

MES

(713) 920-2502

Mercury Environmental Services

1604 South Shaver • Pasadena, Texas 77502

November 1, 1995

Radian Corporation
11490 Westheimer #400
Houston, Texas 77077

ATTENTION: Mr. Bill Gusler

SAMPLE NUMBER: 5100599

SAMPLE I.D.: Lovington Lab Tank Project 650-004-07-02
SP-4
10-23-95 @ 1755

DATE RECEIVED: October 24, 1995 @ 1630

CERTIFICATE OF ANALYSIS

TOTAL PETROLEUM HYDROCARBONS	METHOD 3550/418.1	MDL mg/L	RESULT mg/kg	DATE/TIME/ANALYST
TPH		1	3,000	10-27-95 1315 LAB

BTEX	METHOD 8020	MDL mg/L	RESULT mg/kg	DATE/TIME/ANALYST
Benzene		0.005	< 0.5	10-28-95 2124 HDG
Toluene		0.005	0.8	
Ethylbenzene		0.005	< 0.5	
m+p Xylene		0.005	< 0.5	
o-Xylene		0.005	< 0.5	

RECEIVED
FEB 23 1996
O'D HUBBS
OFFICE

Signature: 
Howard W. Apal II, QA/QC Officer

November 1, 1995

MES

(713) 920-2502

Mercury Environmental Services

1604 South Shaver • Pasadena, Texas 77502

November 1, 1995

Radian Corporation
11490 Westheimer #400
Houston, Texas 77077

ATTENTION: Mr. Bill Gusler

SAMPLE NUMBER: 5100600

SAMPLE ID.: Lovington Lab Tank Project 650-004-07-02
SP-5
10-23-95 @ 1810

DATE RECEIVED: October 24, 1995 @ 1630

CERTIFICATE OF ANALYSIS

TOTAL PETROLEUM HYDROCARBONS	METHOD 3550/418.1	MDL mg/L	RESULT mg/kg	DATE/TIME/ANALYST
TPH		1	624	10-27-95 1320 LAB

BTEX	METHOD 8020	MDL mg/L	RESULT mg/kg	DATE/TIME/ANALYST
Benzene		0.005	< 0.5	10-28-95 2210 HDG
Toluene		0.005	< 0.5	
Ethylbenzene		0.005	< 0.5	
m+p Xylene		0.005	< 0.5	
o-Xylene		0.005	< 0.5	

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Signature: 
Howard W. Apel II / QA/QC Officer

November 1, 1995

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Mercury Environmental Services

1604 South Shaver • Pasadena, Texas 77502

November 1, 1995

Radian Corporation
11490 Westheimer #400
Houston, Texas 77077

ATTENTION: Mr. Bill Gusler
SAMPLE NUMBER: 5100607
SAMPLE I.D.: Lovington Lab Tank Project 650-004-07-02
SP-6
10-23-95 @ 1810
DATE RECEIVED: October 24, 1995 @ 1630

CERTIFICATE OF ANALYSIS

TCLP VOLATILES	METHOD 1311/8260	RL mg/L	MDL mg/L	RESULTS mg/L	DATE/TIME/ANALYST
Benzene		0.5	0.005	< 0.005	10-27-95 1357 HDG
Carbon tetrachloride		0.5	0.005	< 0.005	
Chlorobenzene		100.0	0.005	< 0.005	
Chloroform		6.0	0.005	< 0.005	
1,4-Dichlorobenzene		7.5	0.005	< 0.005	
1,2-Dichloroethane		0.5	0.005	< 0.005	
1,1 Dichloroethylene		0.7	0.005	< 0.005	
2-Butanone		200.0	0.050	< 0.005	
Tetrachloroethylene		0.7	0.005	< 0.005	
Trichloroethylene		0.5	0.005	< 0.005	
Vinyl Chloride		0.2	0.01	< 0.010	

TCLP SEMIVOLATILES	METHOD 1311/8270	RL mg/L	MDL mg/L	RESULTS mg/L	DATE/TIME/ANALYST
o-Cresol		200.0	0.01	< 0.02	10-29-95 1312 HDG
m+p Cresol		200.0	0.01	< 0.02	
2,4-Dinitrotoluene		0.13	0.01	< 0.02	
Hexachlorobenzene		0.13	0.01	< 0.02	
Hexachloro-1,3-butadiene		0.5	0.01	< 0.02	
Hexachloroethane		3.0	0.01	< 0.02	
Nitrobenzene		2.0	0.01	< 0.02	
Pentachlorophenol		100.0	0.05	< 0.20	
Pyridine		5.0	0.01	< 0.02	
2,3,5-Trichlorophenol		400.0	0.01	< 0.02	
2,4,6-Trichlorophenol		2.0	0.01	< 0.02	

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CERTIFICATE OF ANALYSIS CONTINUED

TCLP METALS	METHOD 1311	RL mg/L	MDL mg/L	RESULTS mg/L	ANALYSIS DATE/TIME/ANALYST
Arsenic	6010	5.0	0.05	< 0.05	10-27-95 1235 HWA
Barium	6010	100.0	0.01	2.26	10-27-95 1517 HWA
Cadmium	6010	1.0	0.01	< 0.01	10-27-95 1529 HWA
Chromium	6010	5.0	0.01	< 0.01	10-27-95 1431 HWA
Lead	6010	5.0	0.05	< 0.05	10-27-95 1529 HWA
Mercury	7470	0.2	0.005	< 0.005	10-27-95 1330 HWA
Selenium	6010	1.0	0.1	< 0.1	10-27-95 1552 HWA
Silver	6010	5.0	0.01	< 0.01	10-27-95 1410 HWA

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Signature: 
Howard W. Apel, QA/QC Officer

November 1, 1995

5100607

**MERCURY ENVIRONMENTAL SERVICES
QUALITY ASSURANCE REPORT**

ANALYTE	MB mg/L	MS %REC	MSD %REC	RPD	LCS %REC	CCB mg/L	CCV %REC
Arsenic	< 0.05	80.6	109	29.8	81.6	< 0.05	110
Barium	< 0.01	82.9	87.3	4.7	104	< 0.01	100
Cadmium	< 0.01	87.2	86.9	0.4	97.4	< 0.01	96.0
Chromium	< 0.01	88.6	95.1	1.6	89.1	< 0.01	95.0
Lead	< 0.05	82.6	70.8	7.0	85.5	< 0.05	103
Mercury	< 0.005	84.5	91.7	8.2	91.7	< 0.005	98.5
Selenium	< 0.1	109	112	2.7	117	< 0.1	98.2
Silver	< 0.01	97.0	98.0	1.0	105	< 0.01	96.8

SURROGATE SPIKE RECOVERY FOR VOLATILES**% REC**

Dibromofluoromethane	95.6
Toluene-d8	101.2
4-Bromofluorobenzene	94.3

SURROGATE SPIKE RECOVERY FOR SEMIVOLATILES**% REC**

2-Fluorophenol	43.6
Nitrobenzene-d5	84.6
2-Fluorobiphenyl	102.5
2,4,6-Tribromophenol	68.5
p-Terphenyl-d14	88.7
Phenol-d6	42.9

*Note: QAQC results are batched and may not reflect your actual sample results.

Key to QA Abbreviations

MS=Matrix Spike
 MSD=Matrix Spike Duplicate
 RPD=Relative Percent Deviation
 MB=Method Blank
 LCS=Laboratory Control Standard
 CCV=Continuing Calibration Verification
 CCB=Continuing Calibration Blank
 %Rec=Percent Recovery

Signature: _____

Howard W. April II / QAQC Officer

November 1, 1995

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(713) 920-2502

Mercury Environmental Services

1604 South Shaver • Pasadena, Texas 77502

November 1, 1995

Radian Corporation
11490 Westheimer #400
Houston, Texas 77077

ATTENTION: Mr. Bill Gusler

SAMPLE NUMBER: 5100605

SAMPLE ID.: Lovington Lab Tank Project 650-004-07-02
SP-7
10-24-95 @ 0950

DATE RECEIVED: October 24, 1995 @ 1630

CERTIFICATE OF ANALYSIS

TCLP VOLATILES	METHOD 1311/8260	RL mg/L	MDL mg/L	RESULTS mg/L	DATE/TIME/ANALYST
Benzene		0.5	0.005	< 0.005	10-27-95 1529 HDG
Carbon tetrachloride		0.5	0.005	< 0.005	
Chlorobenzene		100.0	0.005	< 0.005	
Chloroform		6.0	0.005	< 0.005	
1,4-Dichlorobenzene		7.5	0.005	< 0.005	
1,2-Dichloroethane		0.5	0.005	< 0.005	
1,1 Dichloroethylene		0.7	0.005	< 0.005	
2-Butanone		200.0	0.050	< 0.005	
Tetrachloroethylene		0.7	0.005	< 0.005	
Trichloroethylene		0.5	0.005	< 0.005	
Vinyl Chloride		0.2	0.01	< 0.010	

TCLP SEMI-VOLATILES	METHOD 1311/8270	RL mg/L	MDL mg/L	RESULTS mg/L	DATE/TIME/ANALYST
o-Cresol		200.0	0.01	< 0.02	10-29-95 1220 HDG
m+p Cresol		200.0	0.01	< 0.02	
2,4-Dinitrotoluene		0.13	0.01	< 0.02	
Hexachlorobenzene		0.13	0.01	< 0.02	
Hexachloro-1,3-butadiene		0.5	0.01	< 0.02	
Hexachloroethane		3.0	0.01	< 0.02	
Nitrobenzene		2.0	0.01	< 0.02	
Pentachlorophenol		100.0	0.05	< 0.20	
Pyridine		5.0	0.01	< 0.02	
2,3,5-Trichlorophenol		400.0	0.01	< 0.02	
2,4,6-Trichlorophenol		2.0	0.01	< 0.02	

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CERTIFICATE OF ANALYSIS CONTINUED

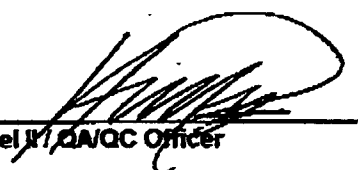
TCLP METALS	METHOD 1311	RL mg/L	MDL mg/L	RESULTS mg/L	ANALYSIS DATE/TIME/ANALYST
Arsenic	6010	5.0	0.05	< 0.05	11-01-95 0720 HWA
Barium	6010	100.0	0.01	0.05	11-01-95 0803 HWA
Cadmium	6010	1.0	0.01	< 0.01	11-01-95 1031 HWA
Chromium	6010	5.0	0.01	< 0.01	11-01-95 0841 HWA
Lead	6010	5.0	0.05	0.84	11-01-95 0927 HWA
Mercury	7470	0.2	0.005	< 0.005	11-01-95 0815 HWA
Selenium	6010	1.0	0.1	< 0.1	11-01-95 0819 HWA
Silver	6010	5.0	0.01	< 0.01	11-01-95 1002 HWA

IGNITABILITY	METHOD SW 846/1010	RESULT F	DATE/TIME/ANALYST
Flashpoint		> 150	10-26-95 1300 LAB

CORROSIVITY: pH	METHOD SW 846/9045	RESULT	DATE/TIME/ANALYST
pH		8.0	10-26-95 1240 LAB

REACTIVITY: as HYDROGEN SULFIDE	METHOD 7.3.4.2	RESULT mg/kg	DATE/TIME/ANALYST
Total Available Hydrogen Sulfide		< 0.25	10-28-95 1325 RAC

REACTIVITY: as HYDROGEN CYANIDE	METHOD 7.3.3.2	RESULT mg/kg	DATE/TIME/ANALYST
Total Available Hydrogen Cyanide		0.60	10-28-95 1230 LAB

Signature: 
Howard W. Apel IV, QA/QC Officer

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November 1, 1995 OFFICE

5100605

**MERCURY ENVIRONMENTAL SERVICES
QUALITY ASSURANCE REPORT**

ANALYTE	MB mg/L	MS %REC	MSD %REC	RPD	LCS %REC	CCB mg/L	CCV %REC
Arsenic	< 0.05	80.6	109	29.8	81.6	< 0.05	110
Barium	< 0.01	82.9	87.3	4.7	104	< 0.01	100
Cadmium	< 0.01	87.2	86.9	0.4	97.4	< 0.01	96.0
Chromium	< 0.01	88.6	95.1	1.6	89.1	< 0.01	95.0
Lead	< 0.05	82.6	70.8	7.0	85.5	< 0.05	103
Mercury	< 0.005	84.5	91.7	8.2	91.7	< 0.005	98.5
Selenium	< 0.1	109	112	2.7	117	< 0.1	98.2
Silver	< 0.01	97.0	98.0	1.0	105	< 0.01	96.8

SURROGATE SPIKE RECOVERY FOR VOLATILES**% REC**

Dibromofluoromethane	95.8
Toluene-d8	99.7
4-Bromofluorobenzene	98.8

SURROGATE SPIKE RECOVERY FOR SEMIVOLATILES**% REC**

2-Fluorophenol	69.9
Nitrobenzene-d5	76.8
2-Fluorobiphenyl	91.4
2,4,6-Tribromophenol	58.1
p-Terphenyl-d14	140.0
Phenol-d6	63.0

*Note: QAQC results are batched and may not reflect your actual sample results.

Key to QA Abbreviations

MS=Matrix Spike
 MSD=Matrix Spike Duplicate
 RPD=Relative Percent Deviation
 MB=Method Blank
 LCS=Laboratory Control Standard
 CCV=Continuing Calibration Verification
 CCB=Continuing Calibration Blank
 %Rec=Percent Recovery

Signature: _____

Howard W. April II / QAQC Officer

November 1, 1995

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(713) 920-2502

Mercury Environmental Services

1604 South Shaver • Pasadena, Texas 77502

November 1, 1995

Radian Corporation
11490 Westheimer #400
Houston, Texas 77077

ATTENTION: Mr. Bill Gusler

SAMPLE NUMBER: 5100602

SAMPLE I.D.: Lovington Lab Tank Project 650-004-07-02
SP-8
10-24-95 @ 1400

DATE RECEIVED: October 24, 1995 @ 1630

CERTIFICATE OF ANALYSIS

TOTAL PETROLEUM HYDROCARBONS	METHOD 3550/418.1	MDL mg/L	RESULT mg/kg	DATE/TIME/ANALYST
TPH		1	66	10-27-95 1330 LAB

BTEX	METHOD 8020	MDL mg/L	RESULT mg/kg	DATE/TIME/ANALYST
Benzene		0.005	< 0.5	10-28-95 1658 HDG
Toluene		0.005	< 0.5	
Ethylbenzene		0.005	< 0.5	
m+p Xylene		0.005	< 0.5	
o-Xylene		0.005	< 0.5	

Signature: 
Howard W. Apel #1 QA/QC Officer

November 1, 1995

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Mercury Environmental Services

1604 South Shaver • Pasadena, Texas 77502

November 1, 1995

Radian Corporation
11490 Westheimer #400
Houston, Texas 77077

ATTENTION: Mr. Bill Gusler

SAMPLE NUMBER: 5100603

SAMPLE I.D.: Lovington Lab Tank Project 650-004-07-02
SP-9
10-24-95 @ 1300

DATE RECEIVED: October 24, 1995 @ 1630

CERTIFICATE OF ANALYSIS

TOTAL PETROLEUM HYDROCARBONS	METHOD 3550/418.1	MDL mg/L	RESULT mg/kg	DATE/TIME/ANALYST
TPH		1	30	10-27-95 1335 LAB

BTEX	METHOD 8020	MDL mg/L	RESULT mg/kg	DATE/TIME/ANALYST
Benzene		0.005	< 0.5	10-28-95 1612 HDG
Toluene		0.005	< 0.5	
Ethylbenzene		0.005	< 0.5	
m+p Xylene		0.005	< 0.5	
o-Xylene		0.005	< 0.5	

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Signature: 
Howard W. Apala / QA/QC Officer

November 1, 1995

5100596 - 5100603

MERCURY ENVIRONMENTAL SERVICES
QUALITY ASSURANCE REPORT

ANALYTE	METHOD	MB mg/L	MS %REC	MSD %REC	RPD	LCS %REC	CCV %REC
TPH	418.1	< 5	102	115	9.2	98	96

ANALYTES	METHOD	MB mg/L	MS %REC	MSD %REC	RPD	STD %REC
Benzene	8020	< 0.005	108	109	1.01	94.2
Toluene		< 0.005	106	106	0.57	98.4
Ethylbenzene		< 0.005	106	111	4.42	97.6
m&p - Xylenes		< 0.005	107	111	3.76	96.4
o-Xylene		< 0.005	107	109	1.39	98.6

Standards Utilized:

TPH: 5-point calibration utilizing working standards derived from neat solutions of n-hexadecane, isooctane and chlorobenzene.

BTEX: 5-point calibration utilizing working standards derived from neat solution of benzene, toluene, ethylbenzene, m-xylene, p-xylene and o-xylene.

Key to QA Abbreviations

MS=Matrix Spike

MSD=Matrix Spike Duplicate

RPD=Relative Percent Deviation

MB=Method Blank

LCS=Laboratory Control Standard

CCV=Continuing Calibration Verification

CCB=Continuing Calibration Blank

Rec=Percent Recovery

Signature: _____

Howard W. Apel II / QAQC Officer

November 1, 1995

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Mercury Environmental Services

1604 South Shaver • Pasadena, Texas 77502

November 1, 1995

Radian Corporation
11490 Westheimer #400
Houston, Texas 77077

ATTENTION: Mr. Bill Gusler**SAMPLE NUMBER:** 5100604

SAMPLE I.D.: Lovington Lab Tank Project 650-004-07-02
SP-10
10-24-95 @ 1400

DATE RECEIVED: October 24, 1995 @ 1630**CERTIFICATE OF ANALYSIS**

TCLP VOLATILES	METHOD 1311/8260	RL mg/L	MDL mg/L	RESULTS mg/L	DATE/TIME/ANALYST
Benzene		0.5	0.005	< 0.005	10-27-95 1318 HDG
Carbon tetrachloride		0.5	0.005	< 0.005	
Chlorobenzene		100.0	0.005	< 0.005	
Chloroform		6.0	0.005	< 0.005	
1,4-Dichlorobenzene		7.5	0.005	< 0.005	
1,2-Dichloroethane		0.5	0.005	< 0.005	
1,1 Dichloroethylene		0.7	0.005	< 0.005	
2-Butanone		200.0	0.050	< 0.005	
Tetrachloroethylene		0.7	0.005	< 0.005	
Trichloroethylene		0.5	0.005	< 0.005	
Vinyl Chloride		0.2	0.01	< 0.010	

TCLP SEMI-VOLATILES	METHOD 1311/8270	RL mg/L	MDL mg/L	RESULTS mg/L	DATE/TIME/ANALYST
o-Cresol		200.0	0.01	< 0.02	10-29-95 1127 HDG
m+p Cresol		200.0	0.01	< 0.02	
2,4-Dinitrotoluene		0.13	0.01	< 0.02	
Hexachlorobenzene		0.13	0.01	< 0.02	
Hexachloro-1,3-butadiene		0.5	0.01	< 0.02	
Hexachloroethane		3.0	0.01	< 0.02	
Nitrobenzene		2.0	0.01	< 0.02	
Pentachlorophenol		100.0	0.05	< 0.20	
Pyridine		5.0	0.01	< 0.02	
2,3,5-Trichlorophenol		400.0	0.01	< 0.02	
2,4,6-Trichlorophenol		2.0	0.01	< 0.02	

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Page 2

CERTIFICATE OF ANALYSIS CONTINUED

TCLP METALS	METHOD 1311	RL mg/L	MDL mg/L	RESULTS mg/L	ANALYSIS DATE/TIME/ANALYST
Arsenic	6010	5.0	0.05	< 0.05	11-01-95 1235 HWA
Barium	6010	100.0	0.01	1.84	11-01-95 1517 HWA
Cadmium	6010	1.0	0.01	< 0.01	11-01-95 1529 HWA
Chromium	6010	5.0	0.01	< 0.01	11-01-95 1439 HWA
Lead	6010	5.0	0.05	< 0.05	11-01-95 1529 HWA
Mercury	7470	0.2	0.005	< 0.005	11-01-95 1330 HWA
Selenium	6010	1.0	0.1	< 0.1	11-01-95 1552 HWA
Silver	6010	5.0	0.01	< 0.01	11-01-95 1410 HWA

Key to Report Abbreviations

RL=TCLP Regulatory Limits

MDL=Method Detection Limit

mg/L=Parts per million weight/volume

Extraction=Date of extraction for TCLP

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Howard W. Apple, QA/QC Officer

November 1, 1995

5100604

**MERCURY ENVIRONMENTAL SERVICES
QUALITY ASSURANCE REPORT**

ANALYTE	MB mg/L	MS %REC	MSD %REC	RPD	LCS %REC	CCB mg/L	CCV %REC
Arsenic	< 0.05	80.6	109	29.8	81.6	< 0.05	110
Barium	< 0.01	82.9	87.3	4.7	104	< 0.01	100
Cadmium	< 0.01	87.2	86.9	0.4	97.4	< 0.01	96.0
Chromium	< 0.01	88.6	95.1	1.6	89.1	< 0.01	95.0
Lead	< 0.05	82.6	70.8	7.0	85.5	< 0.05	103
Mercury	< 0.005	84.5	91.7	8.2	91.7	< 0.005	98.5
Selenium	< 0.1	109	112	2.7	117	< 0.1	98.2
Silver	< 0.01	97.0	98.0	1.0	105	< 0.01	96.8

SURROGATE SPIKE RECOVERY FOR VOLATILES**% REC**

Dibromofluoromethane

98.2

Toluene-d8

99.9

4-Bromofluorobenzene

96.3

SURROGATE SPIKE RECOVERY FOR SEMIVOLATILES**% REC**

2-Fluorophenol

74.1

Nitrobenzene-d5

75.5

2-Fluorobiphenyl

90.9

2,4,6-Tribromophenol

86.7

p-Terphenyl-d14

144.0

Phenol-d6

61.5

*Note: QAQC results are batched and may not reflect your actual sample results.

Key to QA Abbreviations

MS=Matrix Spike

MSD=Matrix Spike Duplicate

RPD=Relative Percent Deviation

MB=Method Blank

LCS=Laboratory Control Standard

CCV=Continuing Calibration Verification

CCB=Continuing Calibration Blank

%Rec=Percent Recovery

Signature: _____

Howard W. Apel II / QAQC Officer

November 1, 1995

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(713) 920-2502

Mercury Environmental Services

1604 South Shaver • Pasadena, Texas 77502

November 1, 1995

Radian Corporation
11490 Westheimer #400
Houston, Texas 77077

ATTENTION: Mr. Bill Gusler

SAMPLE NUMBER: 5100606

SAMPLE ID.: Lovington Lab Tank Project 650-004-07-02
Trip Blank

DATE RECEIVED: October 24, 1995 @ 1630

CERTIFICATE OF ANALYSIS

TCLP VOLATILES	METHOD 1311/8260	RL mg/L	MDL mg/L	RESULTS mg/L	DATE/TIME/ANALYST
Benzene		0.5	0.005	< 0.005	10-27-95 1609 HDG
Carbon tetrachloride		0.5	0.005	< 0.005	
Chlorobenzene		100.0	0.005	< 0.005	
Chloroform		6.0	0.005	< 0.005	
1,4-Dichlorobenzene		7.5	0.005	< 0.005	
1,2-Dichloroethane		0.5	0.005	< 0.005	
1,1 Dichloroethylene		0.7	0.005	< 0.005	
2-Butanone		200.0	0.050	< 0.005	
Tetrachloroethylene		0.7	0.005	< 0.005	
Trichloroethylene		0.5	0.005	< 0.005	
Vinyl Chloride		0.2	0.01	< 0.010	

Signature: 
Howard W. Apel Jr. QAC Officer

November 1, 1995

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5100606

**MERCURY ENVIRONMENTAL SERVICES
QUALITY ASSURANCE REPORT**

SURROGATE SPIKE RECOVERY FOR VOLATILES**% REC**

Dibromofluoromethane
Toluene-d8
4-Bromofluorobenzene

95.6
101.2
94.3

Key to QA Abbreviations

MS=Matrix Spike
MSD=Matrix Spike Duplicate
RPD=Relative Percent Deviation
MB=Method Blank
LCS=Laboratory Control Standard
CCV=Continuing Calibration Verification
CCB=Continuing Calibration Blank
%Rec=Percent Recovery

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OFFICESignature: 

Howard W. Apel II / QAQC Officer

November 1, 1995

MES

(713) 920-2502

Mercury Environmental Services

1604 South Shaver • Pasadena, Texas 77502

November 1, 1995

Radian Corporation
11490 Westheimer #400
Houston, Texas 77077

ATTENTION: Mr. Bill Gusler

SAMPLE NUMBER: 5100601

SAMPLE ID.: Lovington Lab Tank Project 650-004-07-02
Dup-1
10-23-95

DATE RECEIVED: October 24, 1995 @ 1630

CERTIFICATE OF ANALYSIS

TOTAL PETROLEUM HYDROCARBONS	METHOD 3550/418.1	MDL mg/L	RESULT mg/kg	DATE/TIME/ANALYST
TPH		1	423	10-27-95 1325 LAB

BTEX	METHOD 8020	MDL mg/L	RESULT mg/kg	DATE/TIME/ANALYST
Benzene		0.005	< 0.5	10-28-95 2256 HDG
Toluene		0.005	< 0.5	
Ethylbenzene		0.005	< 0.5	
m+p Xylene		0.005	< 0.5	
o-Xylene		0.005	< 0.5	

Signature: 
Howard W. Apel II / QA/QC Officer

November 1, 1995

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OFFICE

Mercury Environmental Services
1604 South Shaver • Pasadena, Texas 77502

Fax (713) 920-1181

Fax (713) 920-1181

YOUR SAMPLE DESCRIPTION		DATE	TIME	MATRIX
SP-6	comp	10-23-75	1810	shdgs
SP-7	prof	10-24-75	0950	cores
/				
PERSON TAKING SAMPLE SIGNATURE (a. - Print Name & b. - Sign.):				
a. Bill Gustaf		b. Bill Gustaf		
RELINQUISHED BY:	DATE	TIME	RECEIVED BY:	
(Signature)			(Signature)	
METHOD OF PAYMENT		SHIPPED BY:		COURIER
		(Signature)		(Signature)
Sample Remainder Disposal				
Return Sample Remainder To Client Via				

2000

WHITE & CANARY — Shipped with Sample

PINK — Retained by Customer

2000

L. District I - (505) 393-6161
P. O. Box 1940
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

592 SF 11/17

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 4/18/95

Submit Original
Plus 1 Copy
to appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☒ Non-Exempt: ☒ <i>PER LARRY GANDY TELEPHONE 11/1/95 LWP</i> Verbal Approval Received: Yes ☐ No ☐ 2. Management Facility Destination <u>Gandy Marley Inc.</u> 3. Address of Facility Operator <u>32 mi. W. of Tatum</u> 7. Location of Material (Street Address or ULSTR) <u>Artesia Hiway Lovington Yard</u> 9. <u>Circle One:</u> A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. <u>B.</u> All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	4. Generator <u>Gandy Corp.</u> 5. Originating Site <u>Lovington Yard</u> 6. Transporter <u>Gandy Corp.</u> 8. State <u>New Mexico</u>
---	--

BRIEF DESCRIPTION OF MATERIAL:

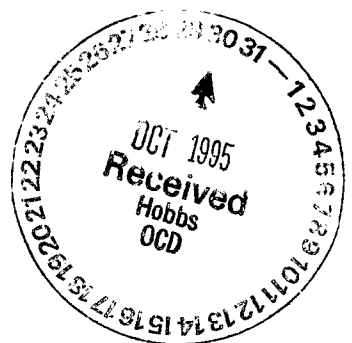
Wash bay solids from the cleaning out of vacuum trucks and frac tanks.

RECEIVED
OCT 30 1995
OCU HOBBS
OFFICE

Estimated Volume 500 cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Larry Gandy TITLE: W-M DATE: 10-27-95
Waste Management Facility Authorized Agent
TYPE OR PRINT NAME: Larry Gandy TELEPHONE NO. (505) 398-4960

(This space for State Use)		
APPROVED BY: <u>[Signature]</u>	TITLE: <u>FRANK BRAGA</u>	DATE: <u>11/1/95</u>
APPROVED BY: <u>[Signature]</u>	TITLE: <u>GEOLOGIST</u>	DATE: <u>1/8/96</u>



GANDY MARLEY, INC.
P. O. BOX 827
TATUM, NEW MEXICO 88267
TATUM, NEW MEXICO ROSWELL, NEW MEXICO

CERTIFICATE OF WASTE STATUS

OILFIELD NON-EXEMPT WASTE MATERIAL

Originating Location: Gandy Corporation

Lovington Yard

Source: Wash Bay solids

Disposal Location: Gandy Marley Inc.

32 mi. w of Tatum N.M.

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OFFICE

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for Gandy Corporation
concur with the status of the waste from the subject site.

Name Larry Gandy

Title/Agency vp / GC

Address P.O. Box 827

Tatum N.M. 88267

Signature Larry Gandy

Date 10-27-95

ARDINAL LABORATORIES

118 S. Commercial Ave.

101 E. Marland

Hobbs, NM 88240

505-393-2326

FAX 505-393-2476

Project Location Lexington Yard Wash bay solids

Larry Crandall

Candy Corp

Soy 827⁰ Totum Tmex 88267

398-~~49~~4960

[illegible]



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

FINAL ANALYSIS REPORT

Company: Gandy Corporation
Address: P.O. Box 827
City, State: Tatum, NM 88267

Date: 10/5/95
Lab #: H2192

Project Name: not given
Location: Lovington Yard
Sampled by: LG
Sample Type: Soil

Date: 9/22/95
Sample Condition: Intact

Sample ID: Washbay Solids Pile

Units: ppm

TCLP SEMIVOLATILES

<u>PARAMETER</u>	<u>RESULT</u>
Pyridine	<0.002
1,4-Dichlorobenzene	<0.002
o-Cresol	<0.002
m,p-Cresol	0.005
Hexachloroethane	<0.002
Nitrobenzene	<0.002
Hexachloro-1,3-butadiene	<0.002
2,4,6-Trichlorophenol	<0.002
2,4,5-Trichlorophenol	<0.002
2,4-Dinitrotoluene	<0.002
Hexachlorobenzene	<0.002
Pentachlorophenol	<0.002

RECEIVED

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OLD HOBBS
OFFICE

METHOD: EPA SW 846-8270

Mitch Irvin
Mitch Irvin

10/5/95
Date



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PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

FINAL ANALYSIS REPORT

Company: Gandy Corporation
Address: P.O. Box 827
City, State: Tatum, NM 88267

Date: 10/5/95
Lab #: H2192

Project Name: not given
Location: Lovington Yard
Sampled by: LG
Sample Type: Soil

Date: 9/22/95
Sample Condition: Intact

Sample ID: Washbay Solids Pile

Units: ppm

TCLP VOLATILES

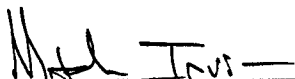
<u>PARAMETER</u>	<u>RESULT</u>
Benzene	<0.002
Carbon tetrachloride	<0.002
Chlorobenzene	<0.002
Chloroform	0.003
1,2-Dichloroethane	<0.002
1,1-Dichloroethylene	<0.002
Methyl ethyl ketone	<0.002
Tetrachloroethylene	<0.002
Trichloroethylene	<0.002
Vinyl chloride	<0.002
1,4-Dichlorobenzene	<0.002

RECEIVED

OCT 30 1995

OCD HOBBS
OFFICE

METHOD: TCLP VOLATILES - EPA SW 846-8260,1311


Mitch Irvin

10/5/95
Date



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PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

TCLP ANALYSIS REPORT

Company: Gandy Corporation
Address: P.O. Box 827
City, State: Tatum, NM 88267

Date: 10/12/95
Lab #: H2192

Project Name: not given
Location: Lovington Yard
Sampled by: LG
Sample Type: Soil

Date: 11:00
Sample Condition: Intact

Sample ID: Washbay Solids Pile

Units: ppm

TCLP INORGANICS (Leachate)

<u>PARAMETER</u>	<u>RESULT</u>	<u>EPA LIMIT</u>
Silver	<0.01	5
Arsenic	<0.01	5
Barium	0.37	100
Cadmium	<0.01	1
Chromium	<0.01	5
Mercury	<0.001	0.2
Lead	<0.02	5
Selenium	<0.02	1

RECEIVED

OCT 30 1995

**OLD HOBBS
OFFICE**

METHODS: TCLP INORGANICS (Leachate) - EPA 1311,600/4-91/010,200.7, 245.1

Mitch Irvin
Mitch Irvin

10/12/95
Date



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

TPH/BTEX ANALYSIS REPORT

Company: Gandy Corporation
Address: P.O. Box 827
City, State: Tatum, NM 88267

Date: 10/5/95
Lab #: H2192

Project Name: not given
Location: Lovington Yard
Sampled by: LG
Analyzed by: MI
Sample Type: Soil

Date: 9/22/95 Time: 11:00
Date: 9/26-27/95 Time: various
Sample Condition: Intact

Units: ppm

Samp #	Field Code	TRPHC	BENZENE	TOLUENE	ETHYL BENZENE	PARA-XYLENE	META-XYLENE	ORTHO-XYLENE	MTBE
1	Washbay Solids Pile	68,299	<0.001	<0.001	0.009	0.009	0.008	0.022	0.126

QC Recovery	413	0.940	0.860	0.821	0.769	0.848	0.834	0.783
QC Spike	405	0.872	0.858	0.856	0.844	0.854	0.844	0.732
Accuracy	101.9%	108 %	100 %	96 %	91 %	99 %	99 %	107 %
Air Blank	***	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

RECEIVED

OCT 3 6 1995

UCD HOBBS
OFFICE

Methods - GAS CHROMATOGRAPHY; INFRARED SPECTROSCOPY
- EPA SW-846; 8020, 418.1, 3510, 3540 or 3550

Mitch Irvin

10/5/95
Date

GANDY CORPORATION

OILFIELD SERVICES

P. O. BOX 827

TATUM, NEW MEXICO 88267

(505) 398-4960

RECEIVED

DEC 2 1995

UCC HONOLULU
OFFICE

DECEMBER 26, 1995

MR. WAYNE PRICE
OIL CONSERVATION DIVISION
P. O. BOX 1980
HOBBS, NM 88240

RECEIVED

DEC 2 1995

UCC HONOLULU
OFFICE

DEAR MR. PRICE:

ENCLOSED ARE THE RCI ANALYSIS TO GO WITH THE TCLP WE SENT TO YOU AT AN EARLIER DATE. THESE SAMPLES WERE TAKEN FROM THE SOLIDS OUT OF THE GANDY CORPORATION WASHBAY.

IF YOU HAVE ANY QUESTIONS ON THIS PLEASE CALL ME AT 505-398-4960.

SINCERELY,

Larry Gandy

LARRY GANDY



PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

PLEASE 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 client for 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 thirty (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.



Chain of Custody Record

ARDINAL LABORATORIES

118 S. Commercial Ave.
Farmington, NM 87401
505-326-4669
FAX 505-326-4535

101 E. Marland
Hobbs, NM 88240
505-393-2326
FAX 505-393-2476

Project I.D. _____
Project Location Livington's Wash Bay Sales
Sampled By Larry Sandy
Client Name Sandy Cord
Address Box 857 - Tatum
Telephone 398-~~4~~ 4966 - Fax 398-6897

[illegible]



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

TCLP ANALYSIS REPORT

Company: Gandy Corporation
Address: P.O. Box 827
City, State: Tatum, NM

Date: 11/30/95
Lab #: H2297

Project Name: Wash Bay Solids
Location: 3 Mi W. Of Lovington
Sampled by: LG
Sample Type: Soil

Date: 11/15/95
Sample Condition: Intact

Sample ID: Yard

HAZARDOUS WASTE CHARACTERIZATION

<u>PARAMETER</u>	<u>RESULT</u>	<u>UNITS</u>
Ignitability (Pensky-Martens Closed Cup)	not enough sample	
Corrosivity, (pH)	7.61	
Reactivity-S	0.0	ppm
Reactivity-CN	8.84	ppm

RECEIVED

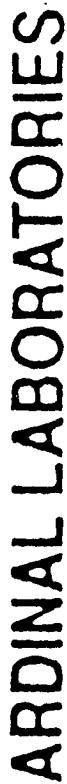
DEC 29 1995

JOE HOBBS
OFFICE

METHODS: HWC - EPA SW 846-7.3, 7.2, 1010

Mitch Irvin

12/5/95
Date



Chain of Custody Record

Project I.D. Wash Boy Solids

Project Location Lovington Yard 3 mi west of Lovington

118 S. Commercial Ave.
Farmington, NM 87401
505-326-4669
FAX 505-326-4535

101 E. Marland
Hobbs, NM 88240
505-393-2326
FAX 505-393-2476

Telephone

[illegible]

District I - (505) 393-6161
P. O. Box 1940
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 4/18/91

Submit Original
Plus 1 Copy
to appropriate
District Office.

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator <u>JARREL SERVICES</u>
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site <u>1304 W. MARLAND</u>
2. Management Facility Destination <u>GANDY MARLEY</u>	6. Transporter <u>VALLEY CONSTRUCTION</u>
3. Address of Facility Operator <u>P.O. Box 1658 ROSWELL</u>	8. State <u>NEW MEXICO</u>
7. Location of Material (Street Address or ULSTR) <u>1304 W. MARLAND</u> <u>HOBBBS, N. MEX</u>	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. ☒ B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

110-120 YARDS OF SOIL - CONTAMINATED FROM WASHING
OIL FIELD SERVICE TRUCKS AND EQUIPMENT

DENIED!

SEE ATTACHED LETTER
DATED 11/27/95

RECEIVED
NOV 22 1995
OLD HOBBS
OFFICE

Estimated Volume 120 cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Bill Marley TITLE: V.P. DATE: 11-21-95
Waste Management Facility Authorized Agent
TYPE OR PRINT NAME: BILL MARLEY TELEPHONE NO. 505-398-4960

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: _____
APPROVED BY: _____ TITLE: _____ DATE: _____

CERTIFICATE OR WASTE STATUS

NON-EXEMPT WASTE MATERIAL

ORIGINATING LOCATION: 1309 W. MARLAND, HOBBS, NM, MEX.

SOURCE: CANDE CIL

DISPOSAL LOCATION: GRANDY - MARLEY

As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's [EPA] July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 261.3[b]".

I, the undersigned as the agent for JARREL SERVICES concur with the status of the waste from the subject site.

NAME: DONNIE DICKERSON

TITLE/AGENCY: VP

ADDRESS: 1309 W. MARLAND

HOBBS, NM 88240

SIGNATURE: Donnie Dickerson

DATE: 11/21/95

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OLD HOBBS
OFFICE

Chain of Custody Record

Project Location 1309 W. Maryland 60343 ALA

FAX 505-393-2476

Telephone 505 393-1786

[illegible]



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

FINAL ANALYSIS REPORT

Company: Jarrel Services
Address: P.O. Box 1230
City, State: Hobbs, NM 88241
Project Name: JSI Service Yard
Location: Hobbs, NM
Sampled by: DW
Sample Type: Soil
Sample ID: Yard

Date: 10/19/95
Lab #: H2218

Page One

Date: 10/6/95
Sample Condition: Intact
Units: ppm

PARAMETER	RESULT
Dichlorodifluoromethane	<0.001
Chloromethane	<0.001
Vinyl Chloride	<0.001
Bromomethane	<0.001
Chloroethane	<0.001
Acetone	<0.001
1,1-Dichloroethene	<0.001
Trichlorofluoromethane	<0.001
Carbon Disulfide	<0.001
Methylene chloride	0.019
trans-1,2-Dichloroethene	<0.001
1,1-Dichloroethane	<0.001
Vinyl Acetate	<0.001
2-Butanone	<0.001
cis-1,2-Dichloroethene	<0.001
2,2-Dichloropropane	<0.001
Chloroform	0.011
Bromochloromethane	<0.001
1,1,1-Trichloroethane	<0.001
1,2-Dichloroethane	<0.001
1,1-Dichloropropene	<0.001
Benzene	<0.001
Carbon tetrachloride	<0.001
Trichloroethene	<0.001
Dibromomethane	<0.001
Bromodichloromethane	<0.001
trans-1,3-Dichloropropene	<0.001
4-methyl-2-pentanone	<0.001
1,2-Dichloropropane	<0.001
cis-1,3-Dichloropropene	<0.001
Toluene	<0.001
1,1,2-Trichloroethane	<0.001
1,3-Dichloropropane	<0.001
2-Hexanone	<0.001
Dibromochloromethane	<0.001
1,2-Dibromoethane	<0.001
Tetrachloroethene	<0.001
Chlorobenzene	<0.001
1,1,1,2-Tetrachloroethane	<0.001
Ethylbenzene	<0.001
m,p-Xylene	<0.001
Bromoform	<0.001
Styrene	<0.001
o-Xylene	<0.001
1,1,2,2-Tetrachloroethane	<0.001
1,2,3-Trichloropropane	<0.001
Isopropylbenzene	<0.001
Bromobenzene	<0.001
2-Chlorotoluene	<0.001
n-propylbenzene	<0.001
4-Chlorotoluene	<0.001
1,3,5-Trimethylbenzene	<0.001

RECEIVED
NOV 22 1995
HOBBS
OFFICE



FINAL ANALYSIS REPORT

Company: Jarrel Services
Address: P.O. Box 1230
City, State: Hobbs, NM 88241
Project Name: JSI Service Yard
Location: Hobbs, NM
Sampled by: DW
Sample Type: Soil
Sample ID: Yard

Date: 10/19/95 Page Two
Lab #: H2218

Date: 10/6/95
Sample Condition: Intact
Units: ppm

PARAMETER

RESULT

tert-Butylbenzene	<0.001
1,2,4-Trimethylbenzene	0.007
1,3-Dichlorobenzene	<0.001
sec-Butylbenzene	<0.001
1,4-Dichlorobenzene	<0.001
4-Isopropyltoluene	<0.001
1,2-Dichlorobenzene	<0.001
n-Butylbenzene	<0.001
1,2-dibromo-3-chloropropane	<0.001
1,2,4-Trichlorobenzene	<0.001
Naphthalene	<0.001
1,2,3-Trichlorobenzene	<0.001
Hexachlorobutadiene	<0.001
2-Chloroethoxyethene	<0.001
Methyl iodide	<0.001

METHOD: VOLATILES - EPA 8260

Mitch Irvin
Mitch Irvin

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NOV 22 1995

OLD HOBBS
OFFICE

10/19/95
Date



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

METALS ANALYSIS REPORT

Company: Jarrel Services
Address: P.O. Box 1230
City, State: Hobbs, NM 88241

Date: 10/19/95
Lab #: H2218

Project Name: JSI Service Yard
Location: Hobbs, NM
Sampled by: DW
Sample Type: Soil

Date: 10/6/95
Sample Condition: Intact
Units: ppm

Sample ID: Yard

PARAMETER

RESULT

Silver	<0.01
Arsenic	1.55
Barium	825.3
Cadmium	4.55
Chromium	19.45
Mercury	0.004
Lead	423.45
Selenium	0.65

RECEIVED

NOV 22 1995
JCD HOBBS
OFFICE

METHODS: -EPA 600/4-91/010, 200.7, 245.1

Mitch Irvin
Mitch Irvin

10/19/95
Date



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

FINAL ANALYSIS REPORT

Company: Jarrel Services
Address: P.O. Box 1230
City, State: Hobbs, NM 88241

Date: 10/19/95
Lab #: H2218

Project Name: JSI Services Yard
Location: Hobbs, NM

Sampled by: DW Date: 10/6/95
Analyzed by: MI Date: 10/12/95 Time: 1317
Sample Type: Soil Sample Condition: Intact Units: ppm

Samp
#

FIELD CODE

TRPHC

1 | Yard

| 36,114 |

QC Recovery	420.6
QC Spike	415
Accuracy	101.3%

RECEIVED

NOV 22 1995

JOE HOBBS
OFFICE

Methods - INFRARED SPECTROSCOPY
- EPA SW-846; 418.1, 3510, 3540 or 3550

Mitch Irvin
Mitch Irvin

10/19/95
Date



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

TCLP ANALYSIS REPORT

Company: Jarrel Services
Address: P.O. Box 1230
City, State: Hobbs, NM 88241

Date: 11/9/95
Lab #: H2218

Project Name: JSI Service Yard
Location: Hobbs, NM
Sampled by: DW
Sample Type: Soil

Date: 10/6/95
Sample Condition: Intact

Sample ID: Yard

HAZARDOUS WASTE CHARACTERIZATION

<u>PARAMETER</u>	<u>RESULT</u>	<u>UNITS</u>
Ignitability (Pensky-Martens Closed Cup)	>140	F
Corrosivity, (pH)	8.24	
Reactivity-S	4.0	ppm
Reactivity-CN	0.13	ppm

RECEIVED

NOV 22 1995
OCD HOBBS
OFFICE

METHODS: HWC - EPA SW 846-7.3, 7.2, 1010

Mitch Irvin
Mitch Irvin

11/9/95
Date

Hazardous Characteristics

IGNITABILITY — A solid waste exhibits the characteristic of ignitability if a representative sample of the waste has any of the following properties:

- It is a liquid, other than an aqueous solution containing less than 24 percent alcohol by volume and has flash point less than 60°C (140°F).
- It is not a liquid and is capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard.

- It is an ignitable compressed gas as defined in 49 CFR 173.300 and as determined by the test methods described in that regulation or equivalent test methods approved by EPA under sections 260.20 and 260.21.

CORROSIVITY — A solid waste exhibits the characteristic of corrosivity if a representative sample of the waste has either of the following properties:

- It is aqueous and has a pH less than or equal to 2 or greater than or equal to 12.5.
- It is a liquid and corrodes steel at a rate greater than 6.35 mm (0.250 inch) per year at a test temperature of 55°C (130°F).

REACTIVITY — A solid waste exhibits the characteristic of reactivity if a representative sample of the

waste has any of the following properties:

- It is normally unstable and readily undergoes violent change without detonating.
 - It reacts violently with water.
 - It forms potentially explosive mixtures with water.
 - When mixed with water, it generates toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment.
 - It is a cyanide or sulfide bearing waste which, when exposed to pH conditions between 2 and 12.5, can generate toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment.
 - It is capable of detonation or explosive reaction if it is subjected to a strong initiating source or if heated under confinement.
 - It is readily capable of detonation or explosive decomposition or reaction at standard temperature and pressure.
 - It is a forbidden explosive as defined by EPA.
- TOXICITY** — A solid waste exhibits the characteristic of toxicity if the extract from a representative sample of the waste contains any contaminants listed by EPA at a concentration equal to or greater than a respective thresholds value.

T C L P

COMPLIANCE CRITERIA

Maximum Concentrations

Metals:	mg/l
Arsenic	5.0
Barium	100
Cadmium	1.0
Chromium	5.0
Lead	5.0
Mercury	0.2
Selenium	1.0
Silver	5.0

Herbicides:	mg/l
2,4-D	10
2,4,5-TP (Silvex)	1.0

Volatiles:	mg/l
Benzene	0.5
Carbon Tetrachloride	0.5
Chlorobenzene	100
Chloroform	6.0
1,2-Dichloroethane	0.5
1,1-Dichloroethylene	0.7
Methyl Ethyl Ketone	200
Tetrachloroethylene	0.7
Trichloroethylene	0.5
Vinyl Chloride	0.2

Semivolatiles:	mg/l
o-Cresol	200
m-Cresol	200
p-Cresol	200
2,4-Dinitrotoluene	0.13
Hexachlorobenzene	0.13
Hexachlorobutadiene	0.5
Hexachloroethane	3.0
Nitrobenzene	2.0
Pentachlorophenol	100
Pyridine	5.0
2,4,5-Trichlorophenol	400
2,4,6-Trichlorophenol	2.0
1,4-Dichlorobenzene	7.5

Pesticides:	mg/l
Chlordane	0.03
Endrin	0.02
Heptachlor	.008
Heptachlor Epoxide	.008
Lindane	0.4
Methoxychlor	10
Toxaphene	0.5



OIL CONSERVATION DISTRICT OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
'95 NO: 27 HOIL 258
OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

TO: ROGER ANDERSON - NMOCD
ROGER PLEASE REPLY
& CALL ME
THANKS WAYNE Price!

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

November 22, 1995

Mr. Bill Marley
Gandy Marley, Inc.
P.O. Box 1658
Roswell, NM 88201

Reference: Gandy Marley, Inc. Landfarm Permit (NM-711-10020).
Subject: C-138 request for Jarrel Services located in Hobbs, NM. (copy attached for reference).

Dear Mr. Marley,

Your request for the above subject waste is hereby denied for the following reasons:

1. The analytical results supplied do not meet the conditions for EPA RCRA TCLP compliance criteria required by the NMOCD, i.e. method 8260 does not include all of the constituents required under the TCLP criteria.
2. The analytical results for metals indicated the waste stream has elevated levels of heavy metals i.e. Barium >800 ppm, Cadmium 4.55 ppm, Chromium 19.45 ppm, and lead at 423.25 ppm. These values exceed the limits allowed under EPA RCRA compliance criteria and might be possible hazardous waste.

Please note NMOCD permitted landfarms are not allowed to accept EPA RCRA Hazardous Waste.

Also the Gandy Marly, Inc. facility was permitted as a "Landfarm" not a "Landfill". NMOCD landfarms per our guidelines and permitting conditions require that all waste be treated to acceptable levels. Your request does not address this issue. Please note, heavy metals typically cannot be treated by bioremediation methods you are currently using.

3. The Chain of Custody supplied did not include or indicate if the samples were preserved properly.



4. The "Certificate of Waste Status Non-Exempt Waste Material" indicated the source was crude oil. Please note in the future this should be the description of the waste and where the material is being generated out of for i.e. sludge from facility sump, oily contaminated soil from wash-out pit, excavated soil, etc.

In order to assist you in the future on these matters I have included a list of the EPA RCRA Hazardous Characteristics which the NMOCD requires for all non-exempt waste.

If you have any further question please do not hesitate to call or write.

Sincerely Yours,

A handwritten signature in cursive script, appearing to read "Wayne Price".

Wayne Price-Environmental Engineer

cc: Jerry Sexton-NMOCD District I Supervisor
Roger Anderson-NMOCD Environmental Bureau Chief
Chris Eustice-NMOCD Environmental Bureau

attachments-2

District I - (505) 393-6161
P. O. Box 1940
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 4/18/95

Submit Original
Plus 1 Copy
to appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator <u>PRIDE PIPELINE</u>
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site <u>514-T185-R32E</u>
2. Management Facility Destination <u>CANDY MARLEY</u>	6. Transporter <u>VALLEY CONSTRUCTION</u>
3. Address of Facility Operator <u>PO Box 1658 Roswell</u>	8. State <u>NEW MEXICO</u>
7. Location of Material (Street Address or ULSTR) <u>514-T185-R32E HARVEY E. VATES - YOUNG DEEP</u>	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

12 TO 16 YDS. OF SAND, SOAKED WITH CRUDE OIL - CAUSED FROM SPILL FROM PUMP SEAL IN PUMP WENT OUT.

RECEIVED

SEP 28 1995

UDD HOBBS
OFFICE

Estimated Volume 16 cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Bill Marley TITLE: ST DATE: 8/13/95
Waste Management Facility Authorized Agent
TYPE OR PRINT NAME: Bill Marley TELEPHONE NO. 505 398 4960

(This space for State Use)

APPROVED BY: W. J. Poirer TITLE: Engr. Frank DATE: 9/29/95
APPROVED BY: Will Olson TITLE: Geologist IV DATE: 10/4/95

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

ORIGINATING LOCATION: HARVEY E. VATES - YOUNG DEEP #1

SOURCE: CRUDE OIL

DISPOSAL LOCATION: GANDY - MIARLEY

As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's [EPA] July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 261.3[b]".

I, the undersigned as the agent for Pride Pipeline
concur with the status of the waste from the subject site.

NAME: J.C. Donaldson

TITLE/AGENCY: MANAGING SUP. Pride Pipeline Co

ADDRESS: P.O. Box 277
Carlsbad, NM 88220

SIGNATURE: J.C. Donaldson

DATE: 9-22-95

RECEIVED

SEP 26 1995

OCU HUBB.
OFFICE



PHONE (915) 673-7001 * 2111 BEECHWOOD * ABILENE, TX 79603

PHONE (505) 393-2326 * 101 E. MARLAND * HOBBS, NM 88240

PHONE (505) 326-4669 * 118 S. COMMERCIAL AVE. * FARMINGTON, NM 87401

TCLP ANALYSIS REPORT

Company: Pride Petroleum
Address: P.O. Box 277
City, State: Carlsbad, NM

Date: 9/6/95
Lab #: H2161

Project Name: Pride Petroleum
Location: Harvey E. Yates- Young Deed
Sampled by: DW
Sample Type: Soil

Date: 8/30/95
Sample Condition: Intact

Sample ID: none given

TCLP INORGANICS (Leachate)

<u>PARAMETER</u>	<u>RESULT</u>	<u>EPA LIMIT</u>	<u>UNITS</u>
Silver	<0.1	5	ppm
Arsenic	<0.1	5	ppm
Barium	0.7	100	ppm
Cadmium	<0.1	1	ppm
Chromium	<0.1	5	ppm
Mercury	<0.1	0.2	ppm
Lead	<0.1	5	ppm
Selenium	<0.1	1	ppm

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SEP 2 8 1995

CCD HOBBS
OFFICE

METHODS: TCLP INORGANICS (Leachate) - EPA 1311/7000

Gayle A. Potter

09/06/95
Date

ANVIRON, INC.

ANALYTICAL, ENVIRONMENTAL & GEOCHEMICAL SERVICES

ANALYSIS REPORT

PRIDE REFINING

P.O. BOX 3237

ABILENE, TX 79604

ATTN: TONY DAVEE

WORK ORDER # 94781
SAMPLE DATE 11/2/94

PROJECT NAME: HOBBS SAMPLES
PROJECT LOCATION:

ANVIRON ID. NO	SAMPLE TYPE	SAMPLE ID	TPH (ppm)	BENZENE (ppb)	TOLUENE (ppb)	ETHYL- BENZENE (ppb)	m,p,o- XYLENES (ppb)
94781-A1	SOIL	HOBBS A1	13000	< 38.0	295	< 38.0	440
94781-A2	SOIL	HOBBS A2	5910	< 38.0	293	< 38.0	< 121
94781-A3	SOIL	HOBBS B1	14300	< 38.0	290	< 38.0	< 121
94781-A4	SOIL	HOBBS B2	10900	< 38.0	289	< 38.0	< 121
94781-A5	SOIL	HOBBS C	2890	< 38.0	353	< 338.0	< 121

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OCU HOBBS
OFFICE

ANALYSIS DATE		11/8/94	11/11/94	11/11/94	11/11/94	11/11/94
DETECTION LIMIT		100.0	38.0	38.0	38.0	121.0
DUPLICATE DEVIATION		7%	< 1%	6%	< 1%	3%
SPIKE CONC	SPIKE	618	249	250	260	604
% RECOVERY		89%	110%	116%	120%	92%
CONTROL CONC	CONTROL	100	39.8	37.8	38.1	126
% RECOVERY		92%	101%	107%	107%	100%

RTX: EPA SW 846-5030 PURGE & TRAP: EPA SW 846-8020

TPH: EPA 418.1, SW846-3540

Chemist Dale Garner

11/16/94
Date

DRAWER N • HSU STATION • ABILENE, TEXAS 79698 • (915) 670-1500

TOTAL P.02

Telephone

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SEP 28 1995
OFFICE
OF THE ATTORNEY GENERAL

[illegible]

District I - (505) 393-6161
P. O. Box 1940
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

SF SF 9/18/95

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-138
Originated 4/18/95

Submit Original
Plus 1 Copy
to appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ <i>See Per Bill Marley</i>	4. Generator <i>KOCH OIL CO.</i>
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site <i>S5-T195-R35E</i>
2. Management Facility Destination <i>CANDY Marley</i>	6. Transporter <i>VALLEY CONSTRUCTION</i>
3. Address of Facility Operator <i>PO Box 1658 Roswell</i>	8. State <i>NEW MEXICO</i>
7. Location of Material (Street Address or ULSTR) <i>S5-T195-R35E SCHARB STATION</i>	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. ☒ B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

THE CONTAMINATED SOIL IS A RESULT OF STORAGE TANKS
BEING RAN OVER WITH CRUDE OIL FROM VARIOUS
LEASES OVER A PERIOD OF SEVERAL YEARS.
CONTAMINATION WAS CONTAINED INSIDE OF A
DIKE AROUND TANKS.

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SEP 15 1995

UCD HOBBS
OFFICE

Estimated Volume 1650 cy Known Volume (to be entered by the operator at the end of the haul) 0 cy
Candy Marley Ranch Farm NM 711-1-8020
SIGNATURE: *Bill Marley* TITLE: *VP* DATE: *8/13/95*
Waste Management Facility Authorized Agent
TYPE OR PRINT NAME: *Bill Marley* TELEPHONE NO. *505 398 4960*

(This space for State Use)

APPROVED BY: *[Signature]* TITLE: *ENVIR ENGR* DATE: *9/18/95*
APPROVED BY: *[Signature]* TITLE: *GEOLOGIST* DATE: *9/21/95*

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

ORIGINATING LOCATION: Scharb Station

SOURCE: Purchased oil from crude leases

DISPOSAL LOCATION: Gandy/Marley Landfarm

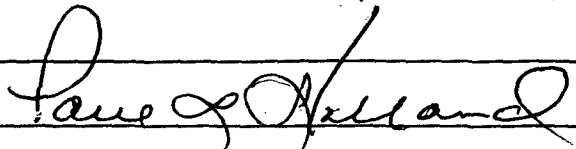
As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's [EPA] July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 261.3[b]".

I, the undersigned as the agent for Koch Pipeline Co., L.P. concur with the status of the waste from the subject site.

NAME: Paul L. Holland

TITLE/AGENCY: Team-Leader Koch Oil Company

ADDRESS: P.O. Box 1200 - Hobbs, NM 88240

SIGNATURE: 

DATE: September 12, 1995

RECEIVED
SEP 15 1995
OCD HOBBS
OFFICE



PHONE (915) 673-7001 * 2111 BEECHWOOD * ABILENE, TX 79603

PHONE (505) 393-2326 * 101 E. MARLAND * HOBBS, NM 88240

PHONE (505) 326-4669 * 118 S. COMMERCIAL AVE. * FARMINGTON, NM 87401

TCLP ANALYSIS REPORT

Company: Valley Construction
Address: P.O. Box 390
City, State: Artesia, NM

Date: 9/6/95
Lab #: H2159

Project Name: Koch
Location: Scharb. Stat.
Sampled by: DW
Sample Type: Soil

Date: 9/6/95
Sample Condition: Intact

Sample ID: NW Corner

TCLP ORGANICS

<u>PARAMETER</u>	<u>RESULT</u>	<u>EPA LIMIT</u>	<u>UNITS</u>
Pyridine	<0.002	5.00	ppm
o-Cresol	<0.002	200	ppm
m,p-Cresol	<0.004	200	ppm
Hexachloroethane	<0.002	3.00	ppm
Nitrobenzene	<0.002	2.00	ppm
Hexachloro-1,3-butadiene	<0.002	0.500	ppm
2,4,6-Trichlorophenol	<0.002	2.00	ppm
2,4,5-Trichlorophenol	<0.002	400	ppm
2,4-Dinitrotoluene	<0.002	0.130	ppm
Hexachlorobenzene	<0.002	0.130	ppm
Pentachlorophenol	<0.002	100	ppm
Vinyl chloride	<0.001	0.20	ppm
1,1-Dichloroethylene	<0.001	0.70	ppm
Methyl ethyl ketone	<0.001	200	ppm
Chloroform	<0.001	6.00	ppm
1,2-Dichloroethane	<0.001	0.50	ppm
Benzene	<0.001	0.50	ppm
Carbon tetrachloride	<0.001	0.50	ppm
Trichloroethylene	<0.001	0.50	ppm
Tetrachloroethylene	<0.001	0.70	ppm
Chlorobenzene	<0.001	100	ppm
1,4-Dichlorobenzene	<0.001	7.50	ppm

TCLP INORGANICS (Leachate)

<u>PARAMETER</u>	<u>RESULT</u>	<u>EPA LIMIT</u>	<u>UNITS</u>
Silver	<0.1	5.0	ppm
Arsenic	<0.1	5.0	ppm
Barium	1.5	100.0	ppm
Cadmium	<0.1	1.0	ppm
Chromium	<0.1	5.0	ppm
Mercury	<0.1	0.2	ppm
Lead	<0.1	5.0	ppm
Selenium	<0.1	1.0	ppm

METHODS: TCLP ORGANICS - EPA 8260/8270

METHODS: TCLP INORGANICS (Leachate) - EPA 1311/7000

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SEP 15 1995
UCD HOBBS
OFFICE

Gayle A. Potter

09/06/95
Date



PHONE (915) 673-7001 * 2111 BEECHWOOD * ABILENE, TX 79603

PHONE (505) 393-2326 * 101 E. MARLAND * HOBBS, NM 88240

PHONE (505) 326-4669 * 118 S. COMMERCIAL AVE. * FARMINGTON, NM 87401

TPH/BTEX ANALYSIS REPORT

Company: Valley Construction
Address: P.O. Box 390
City, State: Artesia, NM 88211-0390

Date: 9/5/95
Lab #: H2159

Project Name: Koch
Location: Scharb. Stat.
Sampled by: DW
Analyzed by: MG
Sample Type: Soil

Date: not given Time: not given
Date: 8/30/95 Time: 4:30
Sample Condition: Intact

Units: ppm

Samp #	Field Code	TRPHC	BENZENE	TOLUENE	ETHYL BENZENE	PARA-XYLENE	META-XYLENE	ORTHO-XYLENE
1	NW Corner	2,820	0.062	0.036	0.074	0.016	0.022	0.030

QC Recovery	391	0.927	0.927	0.912	0.896	0.900	0.896
QC Spike	405	0.878	0.873	0.867	0.862	0.853	0.867
Accuracy	97%	106%	106%	105%	104%	106%	103%
Air Blank	***	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

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SEP 15 1995
UCD HOBBS
OFFICE

Methods - GAS CHROMATOGRAPHY; INFRARED SPECTROSCOPY
- EPA SW-846; 8020, 418.1, 3540, 3510 or 3550

Gayle A. Potter

09/06/95
Date

142159



ARDINAL LABORATORIES

118 S. Commercial Ave.
Farmington, NM 87401
505-326-4669
FAX 505-326-4535

101 E. Marland
Hobbs, NM 88240
505-393-2326
FAX 505-393-2476

Chain of Custody Record

Project I.D. Rock
Project Location Scharb stat.
Sampled By Dennis - Valley Construction
Client Name Paul Holland Koche
Address _____
Telephone 714-276-7410

[illegible]

Submit to Appropriate
District Office to File/Issue

DISTRICT I
191 Bow 1000
Albuquerque, NM 87102

DISTRICT II
191 Bow 1000
Albuquerque, NM 87102

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

DISTRICT III
1000 Bow 1000
Albuquerque, NM 87102

DISTRICT IV
191 Bow 1000
Santa Fe, NM 87501

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE		XXXXXXXXXXXXXXXXXXXXXXX:
1. RCRA Exempt: ☒ Non-Exempt: ☐ Verbal Approval Received: Yes ☐ No ☐	4. Generator REXENE CORPORATION	
2. Destination GANDY-MARLEY, INC.	5. Name of Originating Site ODESSA PLANT	
3. Address of Facility Operator P. O. BOX 827, TATUM, NM 88267	6. Name of Transporter	
7. Location of Material (Street Address or ULSTR)	8. State TEXAS	
9. <u>Circle One</u> A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-oilfield exempt wastes will be accompanied by a certification of waste status from the Generator and the New Mexico Environment Department or other appropriate government agency; two certificates per job. C. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analyses to prove the material is non-hazardous and the Generator's certification of origin. No waste classified as hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.		

BRIEF DESCRIPTION OF THE MATERIAL:

STYRENE TAR

DENIED "NON-OIL FIELD"
8/1/95 J

RECEIVED
AUG 03 1995

Estimated Volume 900 yards cy Known Volume (to be entered by the operator at the end of the haul): _____
I hereby certify that the information above is true and complete to the best of my knowledge and belief.
SIGNATURE Larry Gandy TITLE field foreman DATE 7-29-95
TYPE OR PRINT NAME LARRY GANDY TELEPHONE NO. 505-398-4960

(This space for State Use)

APPROVED BY _____ TITLE _____ DATE _____

APPROVED BY _____ TITLE _____ DATE _____



CONSERVATION DIVISION
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35 AUG 7 AM 8 52

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

August 4, 1995

Mr. Larry Gandy
Gandy Corporation
P.O. Box 827
Tatum, New Mexico 88267

Reference: Request for approval to accept solid waste.

Subject: Rexene Corp.- Styrene Tar

Dear Larry,

Please note your request for the above mentioned request **has been denied** because in our opinion it would be classified as an "NON-OIL FIELD" waste. Your NMOC permitted landfarm is allowed to accept only oilfield related waste.

Any rebuttal for this submittal should be addressed to our Environmental Bureau in Santa Fe, NM.

Thank you for your time and effort in this matter and if I can be of any further assistance please do not hesitate to call or write.

Sincerely yours,

Wayne Price-Environmental Engineer

cc: Jerry Sexton-District I Supervisor
Roger Anderson-Environmental Bureau Chief
Chris Eustice-Environmental Geologist

attachment-1

