

### REPORTS





ENVIRONMENTAL PLUS, INC. MicroBlaze STATE APPROVED LAND FARM AND ENVIRONMENTAL SERVICES

March 28, 2001

Mr. Wayne Price NMOCD Environmental Bureau P.O. Box 6429 1220 South Saint Francis Drive Santa Fe, New Mexico 87505

Subject: Chevron/Anadarko West Hugh Lease Railroad Conduit Remediation

OCD Case #: 1R0296

Dear Mr. Price,

Environmental Plus, Inc. of Eunice, New Mexico on behalf of Mr. Rick Massey, Chevron USA and Mr. Larry Pickerel, Anadarko Petroleum Corporation is submitting the enclosed final New Mexico Oil Conservation Division (NMOCD) form C-141 and a copy of the report titled, "Remediation Work Plan and Closure Report for the production fluid release associated with the West Hugh Lease Railroad Conduit," that documents successful remediation of the site. An initial form C-141 was not required or submitted. A copy of the form and report are also being transmitted to Mr. Chris Williams at the NMOCD Hobbs Office.

If more information is required, please contact Mr. Massey, Mr. Pickerel, or myself at 505.394.1237, 915.425.4208, or 505.390.7864, respectively.

Sincerely,

Pat McCasland EPI Technical Services Manager

cc: Chris Williams, NMOCD Hobbs Rick Massey, Chevron Larry Pickerel, Anadarko Ben Miller, EPI Vice President and General Manager Sherry Miller, EPI President file Mino.Riese Out 14

apr

1625 N. French Dr., Hobbs, NM 88240 Energy Minerals	f New Mexico s and Natural Resources rvation Division	Form C-141 Revised March 17, 1999				
District III 2040 S 1000 Rio Brazos Road, Aztec, NM 87410 Santa I District IV 2040 South Pacheco, Santa Fe, NM 87505	ervation Division Jouth Pacheco Fe, NM 87505	Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form				
Release Notification a	and Corrective Action					
		nitial Report V Final Report				
Name	Contract 1 . D'					
Address 2401 Ave O, EUNICE NM 88231	Rick Massey - C Telephone No. <u>A.Massey 394-1237</u> Facility Type					
Facility Name West Hugh Lease Rail Romo Conduit	Facility Type Flowline Ga	Hery Conduit				
Surface Owner Sims/Kennann Mineral Owner	Sims/Kennann	Lease No. Hygh				
LOCATION	OF RELEASE	V				
Unit Letter Section Township Range Feet from the North/	South Line Feet from the East/W	Vest Line County				
F 14 T225 37E		Len				
NATURE O	F RELEASE					
Type of Release	Volume of Release	Volume Recovered				
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery				
Production Flaviline	unknown	October 2000				
Was Immediate Notice Given?	If YES, To Whom?					
By Whom?	Date and Hour					
NA   Was a Watercourse Reached?   If YES, Volume Impacting the Watercourse.						
Yes VNo	NA					
If a Watercourse was Impacted, Describe Fully.* NH	, , , , , , , , , , , , , , , , , , ,					
Describe Cause of Problem and Remedial Action Taken.*						
Release caused by Flowline pipe failure due Removed to an approved NMOCO approx	re corrision, Visibly	contaminated soil				
Removed to an approved NMOCD approx	rel facility (D.N.	WE. KPlant Cloure hipset				
Describe Area Affected and Cleanup Action Taken.* Coll to 40	i bas removed to N'MOCH					
20 diameter horizontal & 21504 yas	Engineeral berrier inso	tollect below pipelines				
~37 vertical { to amelion	ite contamination par	tential of remaining				
Describe General Conditions Prevailing (Temperature, Precipitation	hon t Chloride,					
N/A						
I hereby certify that the information given above is true and complete to	OIL CONSERVA	TION DIVISION				
the best of my knowledge and belief.	UIL CONSERVA	TION DIVISION				
Signature: Son Miller on behalter Andre Ko						
Printed Name:	Approved by					
Title:	District Supervisor: Approval Date:	Expiration Date:				
Date: Phone:	Conditions of Approval:	<u> </u>				
* Attach Additional Sheets If Necessary		Attached				

### CHEVRON USA AND

### ANADARKO PETROLEUM CORP.

### REMEDIATION WORK PLAN AND CLOSURE REPORT

FOR THE PRODUCTION FLUID RELEASE ASSOCIATED WITH THE

### WEST HUGH LEASE RAILROAD CONDUIT

New Mexico Oil Conservation Division Case # 1R0296

NW4 SECTION 14, T22S, R37E -3 miles southeast of Eunice Lea County, New Mexico

FEBS REPORT

Prepared by

Unvironmental Plus, Inc. +324 North Main Street P.O. Box 1558 Eunice, New Mexico 88231 Tele 505\*394\*3481 - FAX 505\*394\*2601



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### 1 WEST HUGH LEASE CONDUIT REMEDIATION WORK PLAN

This plan will restore the impacted surface area to an acceptable agricultural state and remove or isolate soil contaminated above New Mexico Oil Conservation Division (NMOCD) guidelines by historical oil and gas production and handling activities. Of main concern will be the concentration of Chloride, Total Petroleum Hydrocarbon (TPH) and Benzene, Toluene, Ethyl Benzene, and m & p Xylene (BTEX). This Site Specific Remediation Work Plan will provide information and identify activities necessary to;

- 1. Restore the impacted surface area to an acceptable agricultural state
- 2. Document final achievement of acceptable environmental thresholds established by the NMOCD

### 1.1 Site Description

This site is associated with a gallery of five 2" diameter production flow lines owned by Chevron USA and Anadarko Petroleum Corporation that carries production fluid from the Hugh Lease wells east of Highway 18 and the Texas-New Mexico Railroad to the tank batteries on the west via a common conduit under the Texas-New Mexico Railroad right of way. The leak occurred inside the conduit where one or more of the flow lines failed, resulting in production fluid being released to the surface via the east end of the conduit. The decision was made by Chevron and Anadarko managers to first replace or repair the flow lines inside the conduit and then proceed with site remediation. The leak origin lies on the northwest corner of a caliche barrow pit that also received historic run-in from the location. Discovery of the Hugh Lease Top West Conduit site occurred in July 2000, when contractors involved in remediating the Anadarko Top East site located on the northeast corner of the caliche barrow pit, observed crude oil pooling on the surface near the east end of the railroad conduit. Both leaks developed respective flow paths that end in a common pooling area in the bottom of the 25' deep caliche pit. The Top East Anadarko site, flow path, and half the pooling area were remediated to NMOCD standards in August 2000. Details are presented in the "Anadarko West Hugh Highway 18 Conduit Remediation Report, EPI, October 2000." Significant run-in during storm events from the open conduit excavation may have resulted in contaminated fluid recontaminating the pooling area in the bottom of the caliche pit. A site map is included as Attachment I.

### 1.1.1 Historical Use

This land surface is owned by Sims/Kennann and used for livestock grazing, caliche sales, and oil and gas production facilities access.

### 1.1.2 Legal Description

The site is located approximately 3 miles southeast of Eunice, Lea County, New Mexico. The legal description is NW¼ S14 T22S R37E. Latitude 32°23'39"N and Longitude 103°08'18"W.

### 1.1.3 Photographic documentation

Photographs of the site are included as Attachment II.

### 1.1.4 Ecological Description

The area is typical of the Upper Chihuahuan Desert Biome consisting primarily of hummocky sand hills covered with Harvard Shin Oak (Querqus harvardi) interspersed with Honey Mesquite (Prosopis glandulosa) along with typical desert grasses and weeds. Mammals present, include Orrd's and Merriam's Kangaroo Rat, Deer Mouse, White Throated Wood Rat, Cottontail Rabbit, Black Tailed Jackrabbit, and the Mule Deer. Reptiles, Amphibians, and Birds are numerous and typical of area. A survey of Listed, Threatened, or Endangered species has not been conducted.

### 1.1.5 Environmental Media Characterization

Chemical parameters of the soil were characterized consistent with the New Mexico Oil Conservation Division (NMOCD) guidelines published in the following documents;

- Guidelines for Remediation of Leaks, Spills and Releases (August 13, 1993)
- Unlined Surface Impoundment Closure Guidelines (February 1993)

Acceptable "Site Specific" thresholds for contaminants of concern, i.e., Chloride, TPH and BTEX, were determined based on the following;

- Depth to Ground water, i.e., distance from the lower most acceptable concentration to the ground water.
- Wellhead Protection Area, i.e., distance from fresh water supply wells.
- Distance to Surface Water Body, i.e., horizontal distance to all down gradient surface water bodies.

### 1.1.5.1 Ground Water Level

According to the Office of the New Mexico State Engineer ground water level database, there are three water wells with known levels in section 14 of T22S R37E, i.e., 60.76, 68, 54.06 feet below ground surface (bgs). This averages to 60.94'bgs or 61' bgs.

### 1.1.5.2 Depth to Ground Water Calculation

Depth to ground water, i.e., "the vertical distance from the lowermost contaminants to the seasonal high water elevation of the ground water." For the hydrocarbon source term, i.e., TPH, Benzene, and BTEX, this was determined to be 34' and for chloride 21' bgs.

### 1.1.5.3 Ground Water Gradient

According to the USGS (Nicholson & Clbesch), the gradient is to the southeast.

### 1.1.5.4 Wellhead Protection Area

There is one domestic use well located upgradient but within a 1000' radius of the site.

### 1.1.5.5 Distance to Nearest Surface Water Body

There are no naturally occurring surface water bodies located within a 1 mile radius of the site.

### 1.1.5.6 Soil Assessment

The site was divided into 3 areas and considered separately, i.e., Conduit Area, Flow Path, and Pooling Area (Caliche Pit Bottom). The VOC headspace threshold of 200 ppm was used to determine when samples should be ascensioned to the laboratory for analysis and is not implied to be an acceptable remedial goal.

### 1.1.5.6.1 Conduit Area

Soil was excavated to 20' below ground surface and the side walls to the horizontal interval where the VOC readings were <200 ppm and chloride is <1000 mg/Kg. "Five-Point" composite samples of the 4 sidewalls and the bottom hole were collected and ascensioned to the laboratory for Chloride, TPH, and BTEX analyses. Refer to Attachment I, Site Map.

### 1.1.5.6.2 Flow Path

The slope leading from the Top West Conduit Area was sampled at the 0-1' interval below ground surface and surveyed. There were no samples >200 ppm and chloride >1000 mg/Kg. Collecting "Five-Point" composite samples of the sidewalls and the bottom hole was no necessary. Refer to Attachment I, Site Map.

### 1.1.5.6.3 Pooling Area (Pit Bottom)

The East half of the Pooling Area is the responsibility of Anadarko and had been remediated in October 2000. NMOCD remedial goals required excavation to -4 feet below the bottom surface. Storm events have occurred during the interim and washed contamination from the Top West Conduit site into the pit bottom. Three east/west sampling trenches will be excavated and sampled to determine acceptable intervals. Only surface samples were collected as all were surveyed to be <200 ppm and chloride <1000 mg/Kg.

### 1.1.5.7 Ground Water Assessment

The ground water level is conservatively estimated to occur at -61 feet bgs. If the soil assessment indicates that the ground water has been not been impacted by the hydrocarbon source term. Elevated chloride levels exist at the 40' bgs interval..

### 1.2 Data Quality

All laboratory analytical results were within the data quality objectives listed below.

- Laboratory data must have > 85% recovery for TPH and BTEX and >75% recovery for general chemistry parameters.
- Laboratory data must have <15% Relative Percent Difference
- Field headspace analyses must be supported with instrument calibration data and calibration gas certification.

Duplicates or blanks were not submitted to the laboratory.

### 1.3 Project Safety

Hazards that will be encountered at this site include the following;

- Moving equipment
- Buried pipelines
- Highway ingress/egress
- Excavation
- Potential Hydrogen Sulfide Gas

Employees and subcontractors will be required to confirm current training in these hazards. Standard personal protective equipment will include;

• Personal H<sub>2</sub>S Monitor

- Excavation Safety
- Steel Toed Boots/Shoes

- Hard-hat
- Safety Glasses

### 1.4 Process/Procedure

The following sequence was used to guide project implementation.

- 1. Site visit: Photograph and map
- 2. Issue "One Call" and notifying utilities
- 3. Locate, hand spot, and mark buried lines or other structures
- 4. Overhead powerlines are present just beyond the east perimeter and will not be a hazard.
- 5. Lockout/Tagout: Pipeline companies notified of activity but LO/TO unnecessary
- 6. Procedure: Equipment required will be: Backhoe, Excavator, Dump Trucks
  - Daily Tail gate safety meetings and PPE check
  - Excavate visibly contaminated soil and stockpile
  - Haul stockpiled soil to NMOCD approved facility
  - Conduct field VOC headspace analyses on selected samples
  - Collect Composite Sample of the selected areas for laboratory analysis
  - Review data and determine "Depth to Ground Water"
  - Backfill excavations with volume consistent with disposal volume
  - Photograph
  - Develop and issue site specific report
  - Reseed surface

### 2 WORK PLAN IMPLEMENTATION

The process of excavating and disposing of contaminated soil and field surveying began on February 15, 2001.

### 2.1 Origin Trench Sampling

Preliminary trench sampling, to 25' bgs, with the excavator revealed hydrocarbon and chloride contamination above the NMOCD guidelines. However, due to the increased occupational safety hazards, the presence of the foundation sensitive railroad bed, and the increased difficultly and expense involved in excavating more than 20' of soil, it was agreed to backfill the excavation to 4' below the flow lines and advance a sampling borehole to determine the vertical extent of contamination.

### 2.2 Origin Borehole 1 Sampling

The drill rig successfully advanced the borehole collecting discrete soil samples at 5' intervals to 40' bgs. Field VOC Headspace and chloride surveys detected hydrocarbon only nominally and decreasing concentrations of chloride.

### 2.3 Risk Assessment and Clay Barrier Installation

Acknowledging hydrocarbon and chloride contamination below 20' bgs, a proposal to leave the remaining source terms in place and install an engineered barrier to eliminate the vertical transport mechanism was made and accepted. The barrier is 2' thick and constructed of compacted red Triassic clay. The barrier was installed and compacted in 1' thick lifts at ~10'bgs and just below the flow lines and conduit. To prevent transverse or lateral infiltration by water into the remaining contaminants, an additional 8'-10' of the excavation perimeter was pulled into the excavation to extend the lateral border beyond the horizontal zone of contamination. The barrier was also compacted to >95% Proctor of the clay. The Proctor and density tests were performed by Pettigrew and Associates, Hobbs, New Mexico, refer to the original reports in Attachment IV. It should be noted that the barrier is covered with at least 8' of clean soil and will not be susceptible to human intrusion or natural weathering.

### 2.4 Discussion of Data

Samples were collected to verify status of the caliche pit bottom, the flow path into the caliche pit from the surface, and the vertical and horizontal extents of contamination associated with the leak origin. The original laboratory analytical reports and data summary are included as Attachment III.

### 2.4.1 Caliche Pit Bottom Status

Laboratory results from analysis of samples collected from strategic areas in the caliche pit bottom indicate that the TPH, Benzene, and BTEX are below the NMOCD regulatory guidelines and chloride can be considered to be nominally above background levels.

### 2.4.2 Flow Path Status

The flow path was sampled to determine contamination status. Laboratory analytical results indicate that the TPH, Benzene, and BTEX are below the NMOCD regulatory guidelines and chloride can be considered to be nominally above background levels.

### 2.4.3 Leak Origin Sampling

The sidewalls and subsurface were sampled and analyzed.

### 2.4.3.1 Sidewall Assessment

Sidewall sample chloride analyses were slightly elevated but were collected before the excavation perimeter was extended -8-10'to accommodate the barrier. The presence of vegetation indicates it should not be of concern. Sidewall hydrocarbon results were nominal.

### 2.4.3.2 Subsurface Sampling

Laboratory results indicate that hydrocarbon contamination persists to - 27'bgs in the central part of the excavated area. Chloride decreases markedly from 25' to 35' bgs but increases at the 40' bgs interval. The charts below illustrate the concentrations relative to the subsurface interval.



### CHEVRON/ANADARKO HUGH RAILROAD CONDUIT TOTAL PETROLEUM HYDROCARBON (8015M)



### 2.5 Soil Disposal and Backfilling

Various volumes of soil, totaling 1,520 yd<sup>3</sup> were disposed of at Sundance, Rhino, and Environmental Plus, Inc. NMOCD approved facilities. A similar volume of clean backfill was used to bring the excavation to grade.

### 2.6 Surface Restoration

The site will possibly be reseeded with native grasses during the Spring of 2001.

### 2.7 Conclusion

Production fluid contamination at this site resulted in hydrocarbon contamination above the NMOCD remedial guidelines. Contaminated soil was excavated down to 20' bgs and disposed of. It was at this interval the decision was made to install an engineered barrier consisting of a 2' thick compacted clay barrier instead of excavating the remaining contaminated soil. It was determined that approximately 7' of soil beneath the barrier was contaminated above the NMOCD TPH threshold for TPH but not for Benzene and BTEX. Chloride persists but decreases from 25' to 35' bgs but increases at 40'bgs. An anomalous sample or analysis could explain this but more likely is due to a red clay interbed that occurs in the area, i.e., the lithology at an excavation site ~1500' to northeast identified a red clay interbed at ~37'-42'bgs. This is consistent with the borelog information for the origin borehole, i.e., reddish brown sand. These red clay interbeds serve as retarding barriers to the vertical transport of highly soluble ions like chloride and would cause an increase at that interval similar to what the data indicates at the 40' bgs interval origin borehole sample. Based on the information collected during the investigation the barrier will function adequately to protect the ground water at this site and closure is reasonable and justified.

### Attachment I: Site Map



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### Attachment II: Photographs



Hugh Lease Conduit



Hugh Lease Conduit



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Caliche Pit to the left/Railroad Conduit to the right (photo looking southwest)



Caliche Pit to the left/Railroad Conduit to the right (photo looking southwest)



Run-in area from the Railroad Conduit showing historical hydrocarbon impact



Final Contour

### Attachment III: Analyses

## CHEVRON/ANADARKO HUGH RAILROAD CONDUIT REMEDIATION

LIGHTED CELLS INDICATE VALUES IN EXCESS OF THE NMOCD REMEDIAL ACTION GUIDELINE THRESHOLDS, I.E., TPH=100 MG/KG, BENZENE=10.0 MG/KG, AND BTEX=50.0 MG DETECTION LIMITS ARE ITALICIZED

CHLORIDE MG/KG	1948	361	1665	2451	1744	204	157	157	801	2510	2420	581	1350	1380	62	64	63	47	47	63	31	63
GR0+DR0 MG/KG	8860.0	7270.0	7120.0	6220.0	3280.0	100.0	100.0	100.0	100.0	130.2	113.5	100.0	458.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
DRO MG/KG	5240.0	3710.0	3580.0	3290.0	2170.0	50.0	50.0	50.0	50.0	80.2	63.5	50.0	408.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0
GRO MG/KG	3620.0	3560.0	3540.0	2930.0	1110.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0	50.0
VOC (PPM)	1240.0	1965.0	1812.0	2285.0	2036.0	4.7	3.4	2.1	1.2	NA	NA	NA	NA	NA	0.4	0.0	0.9	71.0	699	797	5.7	10.8
LITHOLOGY	RED SAND/CLAY	TAN CALICHE	TAN CALICHE SAND	TAN CALICHE SAND	TAN CALICHE SAND	TAN SAND	TAN SAND	TAN SAND	REDDISH BROWN SAND	TAN CALICHE SAND	TAN CALICHE SAND	TAN CALICHE SAND	TAN CALICHE SAND	TAN CALICHE SAND	TAN CALICHE SAND	TAN CALICHE SAND	TAN CALICHE SAND					
SAMPLE ID# SAMPLE#/INTERV AL	SCAH21501-7	SCAH2I501-10	SCAH2I501-I5	SCAH2I501-20	SCAH21501-25	SCAH22101-25	SCAH22101-30	SCAH22101-35	SCAH22101-40	SOZISOICHESW	SO21501CHSSW	SO2I50ICHNSW	S0216001CHBH	SO21601 WSW	SO21601FP1	SO21601FP2	SOZI60IPBIW	SO2160IPBIE	SO21601PB2W	S02160IPB2E	S021601PB3	S021601PB4
SAMPLE DATE	2/15/2001	2/15/2001	2/15/2001	2/15/2001	2/15/2001	2/21/2001	2/21/2001	2/21/2001	2/21/2001	2/15/2001	2/15/2001	2/15/2001	2/16/2001	2/16/2001	2/16/2001	2/16/2001	2/16/2001	2/16/2001	2/16/2001	2/16/2001	2/16/2001	2/16/2001
SAMPLING INTERVAL FEET BELOW GROUND SURFACE	7	01	15	20	25	27	30	35	07	EAST SIDEWALL	SOUTH SIDEWALL	NORTH SIDEWALL	BOTTOM HOLE	WEST SIDEWALL	,1-0	.1-0	.1-0	.1-0	.1-0	.1-0	,I-0	.1-0
DESCRIPTION	TRENCH	TRENCH	TRENCH	TRENCH	TRENCH	BOREHOLE	BOREHOLE I	BOREHOLE I	BOREHOLE I	COMPOSITE	COMPOSITE	COMPOSITE	COMPOSITE	COMPOSITE	FLOWPATH TRENCH I	FLOWPATH TRENCH 2	BOTTOM TRENCH I WEST	BOTTOM TRENCH I EAST	BOTTOM TRENCH 2 WEST	BOTTOM TRENCH 2 EAST	BOTTOM TRENCH 3	BOTTOM TRENCH 4
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WEST HUGH LEASE CONDUIT

CHEVRON/ANADARKO

## CHEVRON/ANADARKO

# HUGH RAILROAD CONDUIT REMEDIATION

LIGHTED CELLS INDICATE VALUES IN EXCESS OF THE NMOCD REMEDIAL ACTION GUIDELINE THRESHOLDS, I.E., TPH=100 MG/KG, BENZENE=10.0 MG/KG, AND BTEX=50.0 MG

DETECTION LIMITS ARE ITALICIZED

Total Xylene Mg/Kg	37.400	60.900	56.100	50.700	22.300	0.015	0.015	0.015	0.015	0.015	0.015	0.025	0.534	0.015	0.015	0.015	0.015	0.015	0.015	0.015	0.015	0.015
EHTYL Benzene MG/KG	3.800	15.900	15.300	13.500	5.570	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.110	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005
Toluene MG/KG	5.280	25.000	22.100	19.400	6.020	0.005	0.005	0.005	0.005	0.006	0.005	0.010	0.032	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005
Benzene Mg/Kg	49.400	5.310	10.900	5.270	3.380	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005
BTEX MG/KG	95.880	107.110	104.400	88.870	37.270	0.030	0.030	0.030	0.030	0.031	0.030	0.045	0.681	0.030	0.030	0.030	0.030	0.030	0.030	0.030	0.030	0.030
LITHOLOGY	RED SAND/CLAY	TAN CALICHE	TAN CALICHE SAND	TAN CALICHE SAND	TAN CALICHE SAND	TAN SAND	TAN SAND	TAN SAND	REDDISH BROWN SAND	TAN CALICHE SAND	TAN CALICHE SAND	TAN CALICHE SAND	TAN CALICHE SAND	TAN CALICHE SAND	TAN CALICHE SAND	TAN CALICHE SAND	TAN CALICHE SAND					
SAMPLE ID# SAMPLE#/INTERV AL	SCAH2I501-7	SCAH2I501-10	SCAH2I501-15	SCAH2IS01-20	SCAH21501-25	SCAH22101-25	SCAH22101-30	SCAH22101-35	SCAH22101-40	SO2ISOICHESW	SOZISOICHSSW	SO2ISOICHNSW	S0216001CHBH	SO21601 WSW	SOZIGOIFPI	S021601FP2	SO2160IPBIW	SO2160IPBIE	SOZIGOIPBZW	SO21601PB2E	SO21601PB3	S02160IPB4
SAMPLE DATE	2/15/2001	2/15/2001	2/15/2001	2/15/2001	2/15/2001	2/21/2001	2/21/2001	2/21/2001	2/21/2001	2/15/2001	2/15/2001	2/15/2001	2/16/2001	2/16/2001	2/16/2001	2/16/2001	2/16/2001	2/16/2001	2/16/2001	2/16/2001	2/16/2001	2/16/2001
SAMPLING INTERVAL FEET BELOW GROUND SURFACE	7	01	15	20	25	27	30	35	07	EAST SIDEWALL	SOUTH SIDEWALL	NORTH SIDEWALL	BOTTOM HOLE	WEST SIDEWALL	.1-0	,1-0	.1-0	.1-0	,1-0	,1-0	.1-0	,1-0
DESCRIPTION	TRENCH	TRENCH	TRENCH	TRENCH	TRENCH	BOREHOLE I	BOREHOLE I	BOREHOLE I	BOREHOLE I	COMPOSITE	COMPOSITE	COMPOSITE	COMPOSITE	COMPOSITE	FLOWPATH TRENCH I	FLOWPATH TRENCH 2	BOTTOM TRENCH   WEST	BOTTOM TRENCH I EAST	BOTTOM TRENCH 2 WEST	BOTTOM TRENCH 2 EAST	BOTTOM TRENCH 3	BOTTOM TRENCH 4
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PHONE (505) 393-2326 + 101 E. MARLAND + HOBBS, NM 88240

ANALYTICAL RESULTS FOR ENVIRONMENTAL PLUS, INC. ATTN: PAT McCASLAND P.O. BOX 1558 EUNICE, NM 88231 FAX TO: 505-394-2601

Receiving Date: 02/16/01 Reporting Date: 02/20/01 Project Number: NOT GIVEN Project Name: HUGH Project Location: NOT GIVEN Sampling Date: 02/16/01 Sample Type: SOIL Sample Condition: COOL, INTACT Sample Received By: AH Analyzed By: JA

LAB ID	SAMPLE ID	GRO	DRO
		(C6-C10)	(>C10-C28)
		(mg/Kg)	(mg/Kg)
H5623-1	5021601 FP1	<50.0	<50.0
H5623-2	5021601 FP2	<50.0	<50.0
H5623-3	5021601 PB1W	<50.0	<50.0
H5623-4	5021601 PB1E	<50.0	<50.0
H5623-5	5021601 PB2W	<50.0	<50.0
H5623-6	5021601 PB2E	<50.0	<50.0
H5623-7	5021601 PB3	<50.0	<50.0
H5623-8 5021601 PB4		<50.0	<50.0
H5623-9 5021601 WSW		<50.0	<50.0
·····	113023-3 3021001 44344		
Extraction	Date:	02/19/01	02/19/01
Analysis D	ate:	02/19/01	02/19/01
Method Bla	ank	<50.0	<50.0
Quality Control		107	92
True Value	QC	100	100
% Recover	ry	107.0%	91.7%
Relative Pe	ercent Difference	6.5%	3.8%

METHODS:

TPH GRO & DRO - EPASW-846 8015M

am Armstrong

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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 ins subsidiaries at inates 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



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ANALYTICAL RESULTS FOR ENVIRONMENTAL PLUS, INC. ATTN: PAT McCASLAND P.O. BOX 1558 EUNICE, NM 88231 FAX TO: (505) 394-2601

Receiving Date: 02/16/01 Reporting Date: 02/19/01 Project Number: NOT GIVEN Project Name: HUGH Project Location: NOT GIVEN Sampling Date: 02/16/01 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: AH Analyzed By: AH/BC

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					ETHYL	TOTAL
LAB NO.	SAMPLE ID	CI*	BENZENE	TOLUENE	BENZENE	XYLENES
		(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)
<u></u>		<b></b>				<del></del>
ANALYSIS	DATE:	2/19/01	02/16/01	02/16/01	02/16/01	02/16/01
H5623-1	S021601FP1	79	<0.005	<0.005	<0.005	<0.015
H5623-2	S021601FP2	79	<0.005	<0.005	<0.005	<0.015
H5623-3	S021601PB1W	63	<0.005	<0.005	<0.005	<0.015
H5623-4	S021601PB1E	47	<0.005	<0.005	<0.005	<0.015
H5623-5	S021601PB2W	47	<0.005	<0.005	<0.005	<0.015
H5623-6	S021601PB2E	63	<0.005	<0.005	<0.005	<0.015
H5623-7	S021601PB3	31	<0.005	<0.005	<0.005	<0.015
H5623-8	S021601PB4	63	<0.005	<0.005	<0.005	< 0.015
H5623-9	S021601WSW	1380	<0.005	<0.005	<0.005	<0.015
			[			í
Quality Con	trol	1031	0.107	0.106	0.109	0.327
True Value	QC	1000	0.100	0.100	0.100	0.300
% Recovery	1	103	107	106	109	109
Relative Per	rcent Difference	1.9	3.4	4.2	1.6	2.8

METHODS: CI-Std. Methods 4500-CI'B; BTEX-EPA SW-846 8260

Chemist

02/20/2001 Date

Figure 15 562334 XI-Samages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount baid by client for analyses. As cam's 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 services in the event shall be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client its subsidiaries at the single services 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

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CHAIN-OF-CUSIODY AND ANALYSIS REQUEST 

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	(915) 673 7001 Fax (915) 673 7020	(505) 393 2	2326 Fax (505) 393-2476		
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Cardinal cannot accept verbal changes Please fax written changes to 505-393 2476

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ANALYTICAL RESULTS FOR ENVIRONMENTAL PLUS, INC. ATTN: PAT McCASLAND P.O. BOX 1558 EUNICE, NM 88231 FAX TO:

Receiving Date: 02/21/01 Reporting Date: 02/22/01 Project Number: NOT GIVEN Project Name: HUGH Project Location: S24 T22S R37E Sampling Date: 02/21/01 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: BC Analyzed By: BC

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				ETHYL	TOTAL
		BENZENE	TOLUENE	BENZENE	XYLENES
LAB NO.	SAMPLE ID	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)
				<del></del>	- <del></del>
ANALYSIS [	DATE	02/21/01	02/21/01	02/21/01	02/21/01
H5638-1	SCAH22101-25	<0.005	<0.005	<0.005	<0.015
H5638-2	SCAH22101-30	<0.005	<0.005	<0.005	<0.015
H5638-3	SCAH22101-35	< 0.005	<0.005	< 0.005	< 0.015
H5638-4	SCAH22101-40	<0.005	<0.005	<0.005	<0.015
·					
Quality Cont	rol	0.101	0.101	0.102	0.301
True Value C	20	0.100	0.100	0.100	0.300
% Recovery		101	101	102	100
Relative Per	cent Difference	7.2	6.8	7.0	6.2

METHOD: EPA SW-846 8260

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Date

Example and banages Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or ton, shall be limited to the amount paid by client for analyses a claim's including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within (hirty (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 at wares 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



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ANALYTICAL RESULTS FOR ENVIRONMENTAL PLUS, INC. ATTN: PAT McCASLAND P.O. BOX 1558 EUNICE, NM 88231 FAX TO:

Receiving Date: 02/21/01 Reporting Date: 02/22/01 Project Number: NOT GIVEN Project Name: HUGH Project Location: S24 T22S R37E Sampling Date: 02/21/01 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: BC Analyzed By: BC

LAB NUMBI	ER SAMPLE ID	GRO (C <sub>6</sub> -C₁₀) (mg/Kg)	DRO (>C <sub>10</sub> -C <sub>28</sub> ) (mg/Kg)	CI* (mg/Kg)
ANALYSIS	DATE	02/21/01	02/21/01	02/22/01
H5638-1	SCAH22101-25	<50	<50	204
H5638-2	SCAH22101-30	<50	<50	157
H5638-3	SCAH22101-35	<50	<50	157
H5638-4	SCAH22101-40	<50	<50	801
Quality Cont	irol	755	808	1031
True Value (	20	800	800	1000
% Recovery		94.4	101.0	103
Relative Per	cent Difference	1.9	0.4	1.9

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI<sup>\*</sup>: Std. Methods 4500-CI<sup>\*</sup>B \*Analyses performed on 1:4 w:v aqueous extracts.

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Date

PLEAS 5638 Anxing 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 A claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thiny (30) days after completion of the applicable sende on 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 at liables 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

ARDIN 2111 Bio 2111 B	рила L ABORATORIES. 1 Breachwood, Abilenee, 1x 79603 915) 673-7001 Fax (915) 613-7020 Е. у V. i & Лиселта I Ли Ра. 7 202 С. 3 224. 25.2 С. и И. i & Лиселта I Ли Ра. 7225 С. и И. i & Исс. 1 Ли Рас. 25 С. и И. i & Исс. 1 Ли Рас. 1 20 55.2 A H222101 - 25 55.2 A H222101 - 25		Нордая и мара     Вили вида       (505) 393-2476     8/11.10       Р.О. а.     5а.4л.6       Адагева:     Адагева:       Адагева:     210:       Р.О. а.     5а.4л.6       Адагева:     210:       Адагева:     210:       Росания:     210:       Х     2-21:-01       Х     2-21:-01       Х     2-21:-01       Х     2-21:-01		CONTRACT 8030	СНАІМ-01- СИSTODY AND ANALYSIS REQUEST Page of The The The The The The The The	
NEW MOTE: LLAN, Donor Contraction Sampler Relinquished: Relinquished By, (Circle One) Delivered By, (Circle One) Sampler - UPS - Bus - Other:	$\frac{D_{ato}}{T_{mod}} = \frac{1}{2} \frac{1}{2$	Received By: (Lab Staff) Received By: (Lab Staff) Received By: (Lab Staff) Cool Internation	A CHECKED	BY: BY: REMARKS:		Addit Fax #:	

Cardinal cannot accept verbal changes. Please fax written changes to 505 333 2476

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PHONE (915) 673-7001 · 2111 BEECHWOOD · ABILENE, TX 79603

PHONE (505) 393-2326 · 101 E. MARLAND · HOBBS NM 88240

ANALYTICAL RESULTS FOR ENVIRONMENTAL PLUS, INC. ATTN: PAT McCASLAND P.O. BOX 1558 EUNICE, NM 88231 FAX TO:

Receiving Date: 02/19/01 Reporting Date: 02/21/01 Project Number: NOT GIVEN Project Name: HUGH ROAD CROSSING Project Location: NOT GIVEN Sampling Date: 02/15 & 02/16/01 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: AH Analyzed By: BC/AH

LAB NUMB	ER SAMPLE ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/Kg)	DRO (>C <sub>10</sub> -C <sub>28</sub> ) (mg/Kg)	CI* (mg/Kg)
ANALYSIS	DATE	02/20/01	02/20/01	02/20/01
H5628-1	S021501CHESW	<50	80.2	2510
H5628-2	S021501CHSSW	<50	63.5	2420
H5628-3	S021501CHNSW	<50	<50	581
H5628-4	S021601CHBH	<50	408	1350
Quality Cont	trol	749	752	1031
True Value	QC	800	800	1000
% Recovery	· · · · · · · · · · · · · · · · · · ·	93.6	94.0	103
Relative Per	cent Difference	4.1	8.9	1.9

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CIB \*Analyses performed on 1:4 w:v aqueous extracts.

A Cooke

121/01

PLEADSOPPAREMENTS 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. An 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 including those vent shall be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profils incurred by client, its subsidiaries and are so is 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



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PHONE (505) 393-2326 + 101 E. MARLAND + HOBBS, NM 88240

ANALYTICAL RESULTS FOR ENVIRONMENTAL PLUS, INC. ATTN: PAT McCASLAND P.O. BOX 1558 EUNICE, NM 88231 FAX TO:

Receiving Date: 02/19/01 Reporting Date: 02/21/01 Project Number: NOT GIVEN Project Name: HUGH ROAD CROSSING Project Location: NOT GIVEN Sampling Date: 02/15 & 02/16/01 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: AH Analyzed By: BC

				ETHYL	TOTAL
		BENZENE	TOLUENE	BENZENE	XYLENES
LAB NO.	SAMPLE ID	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)
. <u> </u>	· · · · · · · · · · · · · · · · · · ·				
ANALYSIS [	DATE	02/20/01	02/20/01	02/20/01	02/20/01
H5628-1	S021501CHESW	<0.005	0.006	<0.005	<0.015
H5628-2	S021501CHSSW	<0.005	<0.005	< 0.005	<0.015
H5628-3	S021501CHNSW	<0.005	0.010	<0.005	0.025
H5628-4	S021601CHBH	<0.005	0.032	0.110	0.534
	·				
Quality Cont	rol	0.094	0.094	0.095	0.283
True Value C	20	0.100	0.100	0.100	0.300
% Recovery	_	94.0	94.4	95.1	94.2
Relative Per	cent Difference	6.4	5.9	5.2	6.1

METHOD: EPA SW-846 8260

& Cooke

2/21/01 Date

H5628B XIS isolary 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 a 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 sence in one 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 at lates of 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

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Company Name:	" (h(v/or)		8111	ro	A	ANAL YSIS REQUEST
Project Manager.			P.O. #:			
Address:			Company: EPI			
Chty:	State:	Zip:	ALLIN: PAT M'C,	M'CAS Ann)		
Phone #:	Fax #:					
Project #:	Project Owner.		City:			
Project Name:	HUGIA BAN CLOSSING		Starbe: Zip:			
Project Location:	-		-			
Sampler Name:			Fex #:			
FOR LAB USE ONLY		MATRUX	ESERV	SAMPLING		
Lab I.D.	Sample I.D.	ААВ ОР (С)ОМР. ОИТАІИЕЯS ОИИОWATER 5. ТЕМАТЕR I I UDE OIL JDGE	нев : \ Coor D\Byse: нев :	W 5108 HJ_	hloride- Strate-	
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Relinquished E	9-1-19-DI	Received By: (Lab Staff)	// / · ·	_		
Delivered By	Delivered By: (Circle One)	Sample Condit				
Sampler - UPS	- Bus - Other					
+ Cardloal	+ Cardinal rannot accent vechal chance Plana the					

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ANALYTICAL RESULTS FOR ENVIRONMENTAL PLUS, INC. ATTN: PAT McCASLAND P.O. BOX 1558 EUNICE, NM 88231 FAX TO: 505-394-2601

Receiving Date: 02/16/01 Project Owner: CHEV/ANARDARKO Project Number: NOT GIVEN Project Name: HUGH Project Location: SEC14 T22S R37E Sampling Date: 02/15/01 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: GAP Analyzed By: JA

LAB ID	SAMPLE ID	GRO	DRO			ETHYL-	TOTAL	
		(C6-C10)	(>C10-C28)	BENZENE	TOLUENE	BENZENE	XYLENES	
		(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	
H5625-1	SCAH21501 - 7	3620	5240	4.94	5.28	3.80	37.4	
H5625-2	SCAH21501 - 10	3560	3710	5.31	25.0	15.9	60.9	
H5625-3	SCAH21501 - 15	3540	3580	10.9	22.1	15.3	56.1	
H5625-4	SCAH21501 - 20	2930	3290	5.27	19.4	13.5	50.7	
H5625-5	SCAH21501 - 25	1110	2170	3.38	6.02	5.57	22.3	
Extraction	Date:	02/19/01	02/19/01	02/19/01	02/19/01	02/19/01	02/19/01	
Analysis Di	ate:	02/19/01	02/19/01	02/19/01	02/19/01	02/19/01	02/19/01	
Method Bla	ank	<50.0	<50.0	< 0.002	<0.002	<0.002	<0.006	
Quality Col	ntrol	107	92	0.097 0.100		0.088	0.275	
True Value	QC	100	100	0.100 0.100		0.100	0.300	
% Recover	ry	107%	92%	97%	100%	88%	92%	
Relative Pe	ercent Difference	6.5%	3.8%	4.1%	0.7%	1.6%	0.2%	

METHODS: TPH GRO & DRO - EPASW-846 8015M; BTEX--EPA SW-846 8021B, 5030B

Jrn Armstrong

2-20-01

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 atfliates 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



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ANALYTICAL RESULTS FOR ENVIRONMENTAL PLUS, INC. ATTN: PAT McCASLAND P.O. BOX 1558 EUNICE, NM 88231

Receiving Date: 02/16/01 Reporting Date: 02/20/01 Project Owner: CHEVRON/ANADARKO Project Name: HUGH Project Location: SEC 14 T22S R37E Analysis Date: 02/19/01 Sampling Date: 02/15/01 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: GP Analyzed By: AH

LAB NUMBER	SAMPLE ID	CI <sup></sup> (mg/Kg)
H5625-1	SCAH21501-7	1948
H5625-2	SCAH21501-10	361
H5625-3	SCAH21591-15	1665
H5625-4	SCAH21501-20	2451
H5625-5	SCAH21501-25	1744
Quality Control		1031
True Value QC		1000
% Recovery		103
Relative Percent I	Difference	1.9

METHOD: Standard Methods4500-CI'BNOTE: Analyses performed on 1:4 w:v aqueous extracts.

ale Alt Chemist

2001 20 Date

ELEASTO A book of the amount paid by client is exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses A. 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 secure 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 artiliates 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

Company hame: 21, 21, 21, 21, 21, 21, 21, 21, 21, 21,	ARDINAL LABORATORIES, INC.	2111 Beechwood, Abilene, TX 79603 101 East Marland, Hobbs, NM 88240 (915) 673-7001 Fax (915) 673-7020 (505) 393-2326 Fax (505) 393-2476	Environmental Plue Inc. ANA YSIS RECHIEST	LAF MY LEXAND P.O. # SAME.	Company:	State: NM Zh: 8823/	22600 Fax 505, 384, 2201	10 - 11	Lufko Cary: State: Zhr	NH 1221 R875	Charles Contraction of the contr		MATRUX PRESERV SAMPLING 5			I I I I I I I I I I I I I I I I I I I I	SCANALOI-7 SCANALOIZ 20 20 20 20 20 20 20 20 20 20 20 20 20	224H21501-10 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Sch2150/-15 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	XAH21501-20 X X X X 2-15 075 2 5	SCANZIGOI-215 X X 2-15 CAN			1	معرف العظمة الحالية. مما كمان مساطعة مسماحة إند عبر كانت مألين مأضحان تحاط من الحالية الحاصة من الحالية المحمل التركيم المساطعة المحمل الم المحمل المحمل	d is bable for instants or compared damage. Instants when it had a barred with a dama way of a compared or compared of a compared or compared or compared of a compare	Date: 16-01 Received By:	Received By: (Lab Staff)	the officer Xall	(uncie Que)
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### Attachment IV: Proctor and Density Report



LABORATORY TEST REPORT PETTIGREW and ASSOCIATES 1110 N. GRIMES HOBBS, NM 88240 (505) 393-9827

DEBRA P. HICKS, P.E./ L.S.I. WILLIAM M. HICKS, III, P.E./P.S.

TO: Environmental Plus, Inc. MATERIAL: **Red Clay** P.O. Box 1558 Eunice, NM 88231 Attn: Roger Boone TEST METHOD: PROJECT: Chevron W. Hugh ASTM D 2922

DATE OF TEST: February 23, 2001

DEPTH:

See Below

TEST NO.	LOCATION	DRY DENSITY % Maximum	% MOISTURE	DEPTH
SG-1	N. Side of Contaminated Area	105.3	13.7	1 Below Finished Subgrade
SG-2	N. Side of Contaminated Area	98.8	13.0	Finished Subgrade
SG-3	S. Side of Contaminated Area	104.8	15.01	1º Below Finished Subgrade
SG-4	S. Side of Contaminated Area	99.0	12.3	Finished Subgrade

CONTROL DENSITY: 107.2 OPTIMUM MOISTURE: **ASTM D 698** REQUIRED COMPACTION: 95% LAB NO .: 01 487-492 COPIES TO: SPS

PETTIGREW and ASSOCIATES

18.0%

BY: Conf

