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# REPORTS

# DATE: 11/28/2000

November 28, 2000

arson & <u>sociates</u>, Inc

**Environmental Consultants** 

Via Facsimile: (505) 827-8177

Mr. William C. Olson New Mexico Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87505

# RECEIVED

### NOV 3 0 2000

ENVIRONMENTAL BUREAU OIL CONSERVATION DIVISION

Re: Comprehensive Report and Proposed Investigation Plan, Texaco Exploration and Production Inc., J.R. Phillips Tank Battery No. 2, SE/4, NW/4, Section 6, Township 20 South, Range 37 East, Lea County, New Mexico

Dear Mr. Olson:

This letter was prepared by Larson and Associates, Inc. (LA) on behalf of Texaco Exploration and Production Inc. (Texaco), and presents a comprehensive summary of activities associated with excavation of a former emergency pit at Texaco's J.R. Phillips Tank Battery No. 2 (Site), located approximately 2 miles southwest of Monument, New Mexico. The comprehensive summary was prepared for the New Mexico Oil Conservation Division (NMOCD) as a condition of Texaco's request to close on excavation on October 16, 2000. The request was approved by the NMOCD on October 20, 2000.

#### **Background**

The Site is a former emergency pit associated with the J.R. Phillips Tank Battery No. 2, and is located in the southeast quarter (SE/4) of the northwest quarter (NW/4) of Section 6, Township 20 South, Range 37 East, Lea County, New Mexico. The emergency pit was used for temporary containment of produced fluids during upsets at the tank battery. Figure 1 presents a Site location and topographic map. Figure 2 presents a Site drawing.

In December 1999, Texaco retained Environmental Plus, Inc. (EPI) to excavate the emergency pit, and a small burn pit located south-southeast of the emergency pit. Approximately 33,500 cubic yards of hydrocarbon-affected soil was removed from the Site between December 1999 and October 2000. The soil was transported to Texaco's centralized treatment facility (landfarm), located northwest of Jal, New Mexico. The emergency pit (main excavation) was dug to approximately 25 to 30 feet below ground surface (BGS), and the burn pit (satellite excavation) was dug to approximately 12 to 15 feet BGS.

EPI personnel excavated a shallow trench (test trench) in the bottom of the northwest corner of the main excavation, and groundwater was observed approximately 10 feet below the bottom of the excavation, or 35 to 40 feet BGS.

EPI personnel collected soil samples during the early and middle stages of excavation, and LA personnel collected final soil samples from the excavations once it was felt that the majority of hydrocarbon-affected soil had been removed. LA personnel collected soil samples from the test trench on August 17, 2000. Soil samples were collected from the main and satellite excavations on September 15, 2000 and October 3, 2000. The October 3, 2000 samples were collected from the west wall and southwest corner of the main excavation following removal of about 40 cubic

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Mr. William C. Olson. November 28, 2000 Page 2

yards of soil to reduce hydrocarbon levels in these areas following receipt of September 15, 2000 analyses. The samples were submitted under chain-of-custody control to Trace Analysis, Inc., located in Lubbock, Texas, and analyzed for total petroleum hydrocarbons (TPH) and chloride. Soil samples that recorded concentrations of total ionizable hydrocarbon above 100 parts per million (ppm) using a photoionization detector (PID) were analyzed for benzene, toluene; ethylbenzene and xylene (collectively referred to as BTEX). The final laboratory results were submitted to the NMOCD in a letter dated October 16, 2000, incorporated here by reference.

#### **Monitoring Wells**

EPI personnel installed two (2) monitoring wells (MW-1 and MW-2) north of the Site. The wells were drilled using a trailer mounted hollowstem auger drilling rig. The wells were constructed with 2-inch diameter schedule 40 PVC casing, and screen. Groundwater was observed at approximately 36 feet BGS in well MW-1, and 35.9 feet BGS in well MW-2: EPI prepared geologic logs for each borings. A completion record was only available for well MW-2. Table 1 presents a summary of monitoring well drilling and completion details. Appendix A presents the geologic logs and well completion record. Figure 2 presents the well locations.

#### **Groundwater Samples**

On March 15, 2000, EPI personnel collected groundwater samples from a water well located southeast of the Site. On March 17, 2000, EPI personnel collected groundwater samples from a boring (SE boring) drilled near the southeast corner of the Site. A geologic log was not available for the boring. On April 10, 2000, groundwater samples were collected from monitoring wells MW-1 and MW-2.

The water well samples were analyzed for BTEX and chloride. The borehole samples were analyzed for BTEX, TPH (gasoline and diesel ranged hydrocarbons) and chloride. The monitoring wells samples were analyzed for BTEX, anions and cations, including sodium, calcium, magnesium, potassium, carbonate, bicarbonate, total alkalinity, sulfate, chloride, pH, specific conductance and total dissolved solids (TDS). The analyses were performed by Cardinal Laboratories, Inc., located in Hobbs, New Mexico. Table 2 presents a summary of the laboratory analyses. Appendix B presents the laboratory reports.

Referring to Table 2, BTEX was not reported above the test method detection limits in samples from the water well or monitoring wells. Benzene was reported at 0.011 milligrams per liter (mg/L) in the groundwater sample from the southeast boring, and exceeded the New Mexico Water Quality Control Commission (NMWQCC) human health standard of 0.01 mg/L. Toluene, ethylbenzene and xylene from the borehole sample were below the NMWQCC human health standards.

Chloride was reported at 7,300 mg/L (MW-1), 8,704 mg/L (MW-2), 13,152 mg/L (Water Well) and 41,300 mg/L (SE Borehole). Sulfate was reported at 2,061 mg/L and 2,611 mg/L in samples from wells MW-1 and MW-2, respectively. The NMWQCC standards for chloride and sulfate are 250 mg/L and 600 mg/L, respectively. TDS was reported at 15,816 mg/L and 19,312 mg/L in samples from MW-1 and MW-2, respectively. The NMWQCC standard for TDS is 1,000 mg/L.

Mr. William C. Olson November 28, 2000 Page 3

#### **Conclusions**

Chloride and BTEX were highest in groundwater samples from the SE borehole. Guidelines established by the NMOCD recommend collection of groundwater samples from monitoring wells, unless an alternate method is approved by the NMOCD. The potential exists for cross-contamination between unsaturated zone soils and groundwater when samples are collected from the borehole.

Chloride levels in samples from wells MW-1 and MW-2 may represent background conditions or an impact from an upgradient source. The regional groundwater flow direction, based on published information, is from northwest to southeast, suggests that wells MW-1 and MW-2 are positioned hydraulically upgradient to the Site. Sulfate levels reported in groundwater samples from wells MW-1 and MW-2 indicate that background water quality is generally poor.

It is not possible to determine if chloride reported in the sample from the water well is associated with the Site, since no construction records were available for the well. No other monitoring points exist between the Site and the water well to establish groundwater quality or groundwater flow conditions.

#### **Additional Investigations**

Texaco proposes to install three additional monitoring wells south and southeast (downgradient) of the Site, at locations shown on Figure 2. The wells will be drilled to about 60 feet BGS using an air-rotary drilling rig, and soil samples will be collected for visual inspection and field screening using a PID. The soil samples will be collected in accordance with industry and. NMOCD accepted practices, and a log will be prepared for each boring. The wells will be constructed with 2-inch diameter schedule 40 PVC casing and screen. Approximately 20 feet of well screen will be placed in each well, with approximately 15 feet of screen extending into groundwater, and five feet above groundwater. The well screen will be surrounded with graded silica sand, placed into the annulus to a depth approximately 2 feet above the screen. A layer of bentonite pellets, approximately 2 feet thick, will be placed over the sand, and hydrated with potable water. The remainder of the annulus will be filled with cement and bentonite grout, to about one (1) foot below ground. Each well will be secured with a locking steel cover anchored in a concrete pad measuring approximately 3 feet by 3 feet. A New Mexico registered professional land surveyor will survey the wells for horizontal location, top-of-casing and ground elevations. The locations of the wells new will be referenced to the existing monitoring wells.

The wells will be developed using an electric submersible pump or bailed. The purged water will be contained in a portable tank, and placed in the tank battery system, or disposed in permitted well. All equipment coming in contact with groundwater (i.e., water level indicator, interface probe, submersible pump, etc.) will be thoroughly cleaned between wells using laboratory grade. detergent and rinsed.

Groundwater samples will be collected from all wells, including the monitoring wells and water, and analyzed for BTEX, anions, cations, and TDS. The samples will be collected using dedicated disposable polyethylene bailers after the wells are purged. The wells will be pumped or bailed, and the purged water will be managed as previously stated. Depth-to-groundwater will be measured in all wells prior to purging. Groundwater samples will be carefully transferred from the bailers to laboratory-prepared containers. The containers will be labeled, placed in an ice

Mr. William C. Olson November 28, 2000 Page 4

chest, chilled, and transferred under chain-of-custody control to the laboratory. Quality Assurance/Quality Control (QA/QC) samples (i.e., duplicate, trip blank, field blank, etc.) will be collected for data validation. Instrument calibration and field observations will be maintained in a bound field notebook.

A review of New Mexico State Engineer records will be performed to determine the construction of the water well located southeast of the Site. The records review will also include water wells within .5 miles of the Site.

Texaco will submit a final report upon completion of the investigation. Field and laboratory data will be presented in tabular form, and the report will contain a discussion of the field sampling techniques and laboratory results. Drawings, including borehole logs, well completion diagrams, a groundwater potentiometric map and isopleth maps of contaminant concentrations will be included in the report.

Please call Mr. Rodney Bailey at (915) 688-2971 or myself at (915) 687-0901 if you have questions.

Sincerely, LARSON & Associates, Inc.

Mark J. Larson, CPG, CGWP President

Encl.

cc:

Mr. Rodney Bailey - Texaco Mr. Chris Williams – NMOCD, Hobbs District

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TABLES

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Texaco Exploration and Production Inc., J.R. Phillips Tank Battery No. 2 Summary of Monitor Well Drilling and Completion Details, Table 1:

Lea County, New Mexico

Page 1 of 1

Number Drilled (B			I UP UI CASING		
	(BGS)	Elevation	Elevation	Interval	(BGS)
	<u> </u>	(AMSL)	(AMSL)	(BGS)	10-April-00
MW-1 31-Mar-00		3571.61	1	1	36.00
31-Mar-00	42	3571.12		27 - 42	35.90
Notes: Wells drilled by Envi	vironmenta	al Plus, Inc., Eunice,	Wells drilled by Environmental Plus, Inc., Eunice, New Mexico, and completed with 2" Schedule 40 PVC	npleted with 2" Schε	dule 40 PVC

screen and casing.

- Denotes depth in feet below ground surface
- Denotes elevation in feet above mean sea level
- No data available 1. BGS: 2. AMSL: 3. --:

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Table 2:	Summary of Organic and Inorganic Analyses of Groundwater Samples from Monitor Wells, Water Wells and Boreholes
	Texaco Exploration and Production, Inc., J.R. Phillips Tank Battery No. 2
	Lea County, New Mexico

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Sample	Sample	Benzene	Toluene	Ethylbenzene	Xylene	GRO	DRO	Sodium	Calcium	Magnesium
ID	Date	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
P-1	15-Mar-00	<0.002	<0.002	<0.002	<0.006	1	ţ	I	I	I
(Water Well)										
SE	17-Mar-00	0.011	0.005	0.032	0.015	<5.0	<5.0	-	:	ł
(Borehole)										
MW-1	10-Apr-00	<0.002	<0.002	<0.002	<0.006			5058	445	175
MW-2	10-Apr-00	<0.002	<0.002	<0.002	<0.006	-		5871	569	296
Sample	Sample	Potassium	Chloride	Sulfate	Carbonate	Bicarbonate	Alkalinity	Hq	Sp. Cond.	TDS
ID	Date	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	S.U.	us/cm	mg/L
P-1	15-Mar-00	-	13,152	-	3	1	ł	1	ł	
(Water Well)										
SE	17-Mar-00	-	41,300	1	ł	1	1	1	I	1
(Borehole)										
MW-1	10-Apr-00	44	7300	2061	0	556	456	7.01	22,550	15,816
MW-2	10-Apr-00	31	8704	2611	0	566	469	6.91	27,860	19,312
Notes:										
	mg/L: Milligrams per liter	Milligrams per liter								

Below detection limit No data available

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FIGURES





### APPENDIX A

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EPI Logs and Well Completion Records

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R. PHILLIPS SAND Calicht l · **, \* , \* , \* ,** 







### APPENDIX B

## Cardinal Laboratory Reports

ALC: NO

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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 TEXACO EXPLORATION & PRODUCTION ATTN: RODNEY BAILEY 205 E. BENDER HOBBS, NM 88240 FAX TO:

Receiving Date: 03/15/00 Reporting Date: 03/16/00 Project Number: 103 Project Name: J.R. PHILLIPS Project Location: SEC 6 T20S R37E Sampling Date: 03/15/00 Sample Type: GROUNDWATER Sample Condition: COOL & INTACT Sample Received By: AH Analyzed By: BC/AH

LAB NO.	SAMPLE ID	Cľ (mg/L)	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS	DATE:	03/16/00	03/15/00	03/15/00	03/15/00	03/15/00
H4718-1	GW31500P1	13152	<0.002	<0.002	<0.002	<0.006
Quality Cor	atrol	939	0.103	0.103	0.095	0.282
True Value		1000	0.100	0.100	0.100	0.300
% Recover		93.9	103	103	94.5	94.1
	ercent Difference	2.0	3.9	3.1	7.6	6.9

METHODS: CI - Std. Methods 4500-CI B, 418.1; BTEX - EPA SW-846 8260

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<u>3/16/0(</u> Date

#### H4718.XLS

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BILL TO     BILL TO       State:     //       State:     //       State:     //       State:     /       State:     /       State:     /       State:     /       State:     /       State:     /       Project Owner:	(915) 673-7001 Fax (915) 673-7020	282 (202)	-2326 Fax (505) 393-2410		Æ
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ANALYTICAL RESULTS FOR TEXACO E&P, INC. ATTN: RODNEY BAILEY 205 E. BENDER HOBBS, NM 88240 FAX TO:

Receiving Date: 03/17/00 Reporting Date: 03/21/00 Project Number: 103 (TEXACO) Project Name: J.R. PHILLIPS Project Location: SEC6 T20S R37E Sampling Date: 03/17/00 Sample Type: GROUNDWATER Sample Condition: COOL & INTACT Sample Received By: AH Analyzed By: BC

LAB NO.	SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
		0/20/00	0/00/00	0.00.000	0/00/00
ANALYSIS [		3/20/00	3/20/00	3/20/00	3/20/00
H4728-1	GW31500JRPSE	0.011	0.005	0.032	0.015
Oveliky Cont		0.100	0.100	0.007	0.004
Quality Cont		0.100	0.100	0.097	0.291
True Value	QC	0.100	0.100	0.100	0.300
% Recovery	,	99.6	99.6	97.2	96.9
Relative Per	rcent Difference	0.3	<0.1	1.9	2.4

METHOD: EPA SW 846-8021B, 5030, 5021 Gas Chromatography

Date

#### H4728B.XLS

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ANALYTICAL RESULTS FOR TEXACO E&P, INC. ATTN: RODNEY BAILEY 205 E. BENDER HOBBS, NM 88240 FAX TO:

Receiving Date: 03/17/00 Reporting Date: 03/21/00 Project Number: 103 (TEXACO) Project Name: J.R. PHILLIPS Project Location: SEC6 T20S R37E Sampling Date: 03/17/00 Sample Type: GROUNDWATER Sample Condition: COOL & INTACT Sample Received By: AH Analyzed By: BC/AH

t Name: J.R. PHILLIPS t Location: SEC6 T20S R37E		ample Receiven Analyzed By: E		
LAB NUMBER SAMPLE ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/L)	DRO (>C <sub>10</sub> -C <sub>28</sub> ) (mg/L)	Cl (mg/L)	Big : 11-11
ANALYSIS DATE	03/20/00	03/20/00	03/21/00	) & d · I-M
H4728-1 GW31500JRPSE	<5.0	<5.0	41300	Bind William Downa William 3-27-00
Quality Control	18.9	20.4	986	3-27-00
True Value QC	20.0	20.0	1000	
% Recovery	94.6	102	98.6	0
Relative Percent Difference	3.2	12.3	4.8	

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI': Std. Methods 4500-CI'B

14 Contra

3/21/00 Date

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ANALYTICAL RESULTS FOR TEXACO E&P ATTN: RODNEY BAILEY 205 E. BENDER HOBBS, NM 88240 FAX TO: (505) 397-0450

Receiving Date: 04/10/00 Reporting Date: 04/11/00 Project Number: 103 Project Name: J.R.PHILLIPS Project Location: MONUMENT, NM

Sampling Date: 04/10/00 Sample Type: GROUNDWATER Sample Condition: COOL & INTACT Sample Received By: BC Analyzed By: BC

				ETHYL	TOTAL
		BENZENE	TOLUENE	BENZENE	XYLENES
LAB NO.	SAMPLE ID	(mg/L)	(mg/L)	(mg/L)	(mg/L)
ANALYSIS [	DATE	04/10/00	04/10/00	04/10/00	04/10/00
H4778-1	GW41000JPMW1	< 0.002	< 0.002	<0.002	< 0.006
H4778-2	GW41000JPMW2	<0.002	<0.002	<0.002	<0.006
			-	<u>.</u>	
				··	
Quality Cont	trol	0.098	0.098	0.098	0.300
True Value	······································	0.100	0.100	0.100	0.300
% Recovery	·····	98.0	98.4	98.3	100
Relative Per	cent Difference	7.3	6.7	4.5	5.2

METHOD: EPA SW 846-8021B, 5030, 5021 Gas Chromatography

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Date

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ANALYTICAL RESULTS FOR TEXACO E&P ATTN: RODNEY BAILEY 205 E. BENDER HOBBS, NM 88240 FAX TO: (505) 397-0450

Receiving Date: 04/10/00 Reporting Date: 04/12/00 Project Number: 103 Project Name: J.R.PHILLIPS Project Location: MONUMENT, NM

Sampling Date: 04/10/00 Sample Type: GROUNDWATER Sample Condition: COOL & INTACT Sample Received By: BC Analyzed By: AH

		Na	Ca	Mg	K Conductivity	T-Alkalinity
LAB NUMBER	SAMPLE ID	(m <b>g/L)</b>	(mg/L)	(mg/L)	(mg/L) (u mhos/cm)	(mgCaCO <sub>3</sub> /L)

ANALYSIS D	DATE:	04/12/00	04/11/00	04/11/00	04/11/00	04/11/001	04/11/00
H4778-1	GW41000JPMW1	5058	445	175	441	22550	456
H4778-2	GW41000JPMW2	5871	569	296	31	27860	464
Quality Contr	rol	NR	44	58	5.03	1392	NR
True Value C	9C	NR	50	50	5.001	1413	NR
% Accuracy		NR	88	116	101	98.5	NR
Relative Perc	cent Difference	NR	1.8	8.6	0.6	0.2	NR
METHODS:		SM3	3500-Ca-D	3500-Mg E	8 <b>049</b>	120.1	310.1
		CI_	SO₄	CO3	HCO3	рН	TDS
		(m <b>g/L)</b>	(mg/L)	(mg/L)	(m <b>g/L)</b>	(s.u.)	(mg/L)
ANALYSIS D	DATE:	04/11/00	04/11/00	04/11/00	04/11/00!	04/11/00	04/12/00
H4778-1	GW41000JPMW1	7300	2061	0	556	7.01	15816
H4778-2	GW41000JPMW2	8704	2611	0	56 <b>6</b>	6.91	19312
Quality Cont	rol	992	49.39	NR	971	6.97	NR
True Value C	20	1000	50.00	NR	1000	7.00	NR
% Accuracy	· · · · · · · · · · · · · · · · · · ·	99.2	98.8	NR	97.1	99.6	NR
Relative Per	cent Difference	0.9	3.5	NR	-1	0.1	NR
METHODS:		SM4500-CI-B	375.4	310.1	310.11	150.1	160.1

Gayle A. Potter, Chemist

041/2/2000 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 Caudinal within thinty (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 subsidianes, affiliates by a for the applicable of whether such claim is based upon any of the above-stated reasons or otherwise.

ARDINAL LABORATORIES, INC. 2111 Beechwood, Abilene, TX 79603 101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79503 101 East Marland, Hobbs, NM 88240 2005 533 393-2326 Fax (505) 393-2326 Fax (505) 393-2476	ANALYSIS REQUEST	3u01pa J L Su01u H													and al contra-	1: D Yes D Ng Additional Fax # 344-2601 D Pes D No C O F C					
	(915) 673-7001 Fax (915) 673-7020	Company name: OX CO CT C V CO Project Manager: D R R C Reve	Variant 2 2	1 L State: And Zlp: 88240 Attn:	# (575-(297-0422		#	me. TO Phi	A A	FTOJECH LOCATION. FTU / IN/IN/WYY. FOR MATRIX PRES. SAMPLING	LAB I.D. Sample I.D. Sample I.D. Sirab or (c)omp. Sirab o		2 0 0 2 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0		PLEASE NOTE: Libitity and Demogra. Cardina's labitity and clarif's and bits much fir any chain arisen within within the data of the the test for the test of test	withing and received by Lindom we will no implicate, loss of use, of loss of profits in such claim is based upon any of the abo	Received By: Phone Result Fax Result: REMARKS: Received By: (Lab Staff)	Uter DAD	Delivered Bv:     Circle One)     Time!     Sample Condition     Condition     CheckEDBV:       Sampler - UPS     Bus     Other:     Bvs     Cool     Intage	† Cardinal cannot accept verbal changes Please fax written changes to 915 673 7020	
N.	Company Nam	Project Manage	Address: 2	CHY: Hob	Phone #: ビ	Fax #: 50	Project #: //	Project Name:	Project Locatio	FOR LAB USE ON	LAB I.D.	HUSSNO-				PLEASE NOTE: LIADRY II PLEASE NOTE: LIADRY II PLEASE AN CAUNA INDUC	earlies in recent shall C service. In recovered shall C sfillighten or successory and	Sampler Keling		Delivered Bv: Sampler - UPS	† Cardinal c