## R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

October 4, 2013

Mike Bratcher NMOCD District 2 811 South First Street Artesia, New Mexico 88210

RE: Clayton Williams – Jenna Com

Mike:

We propose the remediation plan outlined below in response to the July release from this battery. This letter is copied to the BLM, although we are uncertain if the BLM retains an interest in this SWD as it is on State surface. Figure 1 shows the location of the site, north of the Lovington Highway and west of Bear Grass Draw. Figure 1 also shows the elevation of groundwater (blue contour lines), which is about 3525 feet above sea level at the site. The plan is simple, comprising several steps.

## **Remedial Tasks Completed:**

- 1. Removed all soil from the spill footprint that is visibly stained by crude oil. A total of 1-2 feet of soil removed from the footprint (see Appendix A for photographs of the completed work elements).
- 2. Placed the stained soil on a liner on the location.
- 3. Sampled the area of the spill footprint and the stockpiled soil. We obtained ten composite samples of the spill footprint. In the area due north of the battery and west of the lease road, each composite sample consisted of five discrete samples taken at each corner and from the center of nine a 58 x 50 foot grid cells . A 5-point composite sample was also obtained from an area east of the road for a total of ten samples (see Figure 2) and the stockpiled soil.
- 4. Determined vertical extent of impact by comparing the laboratory results from a background sampling trench with a deep trench located at the intersection of grid cells A/B1 and A/B2. The background sampling trench is located south of the well (See Figure 3), beneath the area that is being used for onsite bioremediation of the impacted soil.
- 5. Evaluated the potential for the any residual produced water within the spill footprint to cause groundwater impacts using a vadose zone model (Appendix B no impact to groundwater is reasonably foreseeable).
- 6. Mixed and graded the area impacted by the recent spill.
- Spread the stockpiled soil on location for in-place bioremediation. The green box on Figure 3 shows the area of inplace bioremediation. Fertilizer was added to the impacted soil to enhance natural bioremediation.
- 8. Seeded all tilled soil with BLM No. 2 with a sufficient amount of seed for two acres (17.00 pounds). The mixture consists of:
  - a. 52.26% Bristlegrass, Plains "VNS" (Setaria Vulpiseta)
  - b. 23.36% Dropseed, Sand "VNS" (Sporobulus Cryptandrus)
  - c. 23.41% Lovegrass, Sand "Bend" (Eragrostis trichodes)



## **Remedial Tasks Remaining**

- 9. Periodically conduct a visual inspection of the site for erosion of the remedy due to rain and for re-vegetation. If deleterious changes to the site are observed, provide e-mail report to OCD that describes proposed or implemented actions in response to observed changes.
- 10. In September 2014, conduct a visual site inspection to determine the efficacy of natural restoration and the seeding effort, prepare report to OCD and surface owner with recommendations for
  - a. additional work or
  - b. closure of the file.
- 11. After acceptable re-vegetation, leave the bio-remediated soil in-place or use the soil as fill where needed on location and seed all disturbed areas.

This proposed remedy is based upon the following data and interpretations:

- A. Figure 2 shows the results of the soil-sampling program within the footprint of the recent spill, the impacted soil removed from the spill footprint and two trench samples. These data and the Appendix C laboratory reports show
  - a. Neither regulated hydrocarbons (BTEX) nor GRO were detected by the laboratory
  - b. TPH results from Method 418.1 are high when compared against total hydrocarbons using Method 8015M
  - c. Background chloride concentrations in surface soil are 300-500 mg/kg based upon background sampling trench and results from samples C3 and B3.
  - d. Background chloride concentration below the root zone is slightly less than 2000 mg/kg, based upon the 5-foot sample at the background trench
  - e. Stained soil removed from the spill footprint excavation contains average chloride concentration of about 3000 mg/kg
  - f. The highest concentration of chloride observed in composite samples taken at the excavated surface is 6840 mg/kg from sample A-2.
- B. The chloride profile (Figure 4) shows that:
  - a. Background conditions (< 2000 mg/kg) exist at 14 feet below original land surface, which is 12 feet below the excavated surface.
  - b. the highest concentration is at a depth of 6 feet below original land surface (4760 mg/kg)
- C. Two earlier releases occurred at the battery site
  - a. 450 bbls of produced water in April 2004
  - b. A few barrels in July 2005
  - c. Figure 5 is a June 2005 Google Earth image showing the footprint of the 2004 release with the green outline.
- D. The Jenna Com well began producing in 1997 and was converted to an injection well in 2000.
- E. The chloride mass released by the 2013 spill was removed to the bioremediation pile.
- F. The AMIGO simulation of the 2-foot thick bioremediation pile (see Appendix D with identified input data) shows no impairment to groundwater (148 mg/L maximum concentration) using the following input data
- G. an initial chloride concentration of about 2700 mg/kg above background conditions for the 2-feet of material placed on location – based upon the analyses showing a background of about 300 mg/kg and a chloride concentration in the pile of about 3,000 mg/kg



- H. the length of the placed material parallel to groundwater flow is about 60 feet based upon site measurements
  - a. a hydraulic conductivity of this placed material that is similar to medium sand due to tilling and mixing of the loamy excavated material based upon professional judgment
  - b. a vadose zone profile similar to what is observed in the area: 1 part sandy clay, 1 part caliche and 1 part medium sand
  - c. an assumed background chloride concentration in groundwater of 100 mg/L
  - d. an aquifer porosity of 30% and a hydraulic conductivity of 20 ft/day based upon professional judgment
  - e. a depth to groundwater of 70 feet and a slope of the water table of 0.004 based upon the data shown in Figure 1
  - f. an aquifer thickness of 20 feet based upon professional judgment
- I. The AMIGO simulation of the 2005 release (a 450 bbl release that, unlike the recent release, was not removed from the spill footprint) shows no impairment of groundwater quality (151 mg/L at year 79). The simulation uses the same input as that described above with the following exceptions (as shown below in Figure 6):
  - a. an initial chloride concentration of about 7000 mg/kg above background conditions for the uppermost 2-foot thick soil zone impacted by the spill. While we believe this concentration over estimates the actual conditions, this concentration creates a reasonable "match" with the chloride profile presented above.
  - b. the length of the impacted soil parallel to groundwater flow is about 100 feet based upon site measurements
  - c. a hydraulic conductivity of surface soil that is similar to caliche. Although the surface soil is a loam, input of caliche as a surface layer creates a reasonable match with the observed vertical profile at year 7 (2013-2005=8 years)



Figure 6: Screen shot of AMIGO graphical user interface. The profile for year 7 is highlighted in the left hand graphic. The profiles show chloride concentration above background versus depth with year 7 providing a relatively close match to the observed profile. For year 7, chloride is at background conditions at 10 feet below original grade and from 4-6 feet below original grade, chloride concentration is 2000 mg/kg (2 g/kg) higher than background.

October 4, 2013 Page 4

The AMIGO simulations, which are only as good as the input data, can be used to provide some reasonable predictions of impacts to groundwater quality from surface releases or small landfarms. The input for two simulations presented in this remediation plan use field data and professional judgment. Where we make assumptions based upon judgment, we use data that will overestimate the impact to groundwater. At the Jenna Com release site, we conclude that the residual chloride in soil (beneath the footprint and in the bioremediation area) poses no threat to groundwater quality.

We also conclude that 5-10 years of normal precipitation (which may translate into two decades of below normal precipitation) will cause the chloride in the surface soil to move below the root zone, allowing the creation of a vegetative cap. Such a cap will effectively prevent infiltration and sequester the chloride well above groundwater. We could artificially add fresh water to accelerate the remedy, but we do not believe that such a use of fresh water is commensurate with any possible benefit.

We will provide OCD with a report in September of 2014. We look forward to working with you on this project.

Sincerely, R.T. Hicks Consultants, Ltd.

Randall T. Hicks Principal

Copy: State Land Office, Terry Warnell BLM, Jim Amos



						Old Loss Red		Excavated So Top of Pile Pile Bottom	il from Spill F Cl 3480 2800	ootprint - R DRO 270 333	esults in mg, EXT DRO 135 121	/kg TPH 1610 2300
		200 f		C - c	в	3 2 1 A © 2013 Googla		Trench Resu Average A1-I Trench 1 Depths at T-2 Background Trench 2	Ilts in mg/kg 31-A2-B2 T-1 T-1 T-1 T-1 T-1 T-1 L are below th Beneath On-S T-2	depth (ft) 1 2 4 6 8 10 12 ne 1-2 foot 6 Site Remedia 2	Cl - mg/kg 4500 3800 4760 3160 3560 3080 1890 excavation su ation of Pile 432	ırface
	Composite C3 C2 C1 East of Roa	Grid Sampl Cl 400 1680 2440 ad	ing Results B3 B2 B1	of Excavated Cl 304 2600 4680 1500	Surface A3 A2 A1	Cl 1280 6480 4240	mg/kg mg/kg mg/kg			5	1940	
R.T. Hicks Consultants Albuquerque, NM				2013 Google Earth Image Showng Sampling Locations and Results Clayton Williams - Jenna Com							Fi	gure 2 ep-13

# Appendix A



View to the northwest of release footprint after excavation of soil stained by hydrocarbons.



View south of stockpiled soil showing three sampling trenches



View north northeast from tank battery firewall showing graded spill footprint.



The texture of the graded surface soil within the spill footprint is a loam. Clods of dirt are clay.



Bioremediation area south of location.

# Appendix B

## Project: Jenna2005Release

Path: P:\Clayton Williams\JennaCom\Correspond\Jenna2005Release.ami Date: 9/16/2013 Units: English (inches) Climate: Arid Hot (NM/W.Texas, Hobbs) Plant Uptake Trigger: 1% Input Concentration

Groundwater Characteristics Background Cl Concentration in Aquifer: 100 [mg/L] Aquifer porosity: 0.3 [-] Groundwater Table Depth: 70 [ft] Aquifer Thickness: 20 [ft] Slope of Water Table: 0.004 [-] Hydraulic Conductivity: 20 [ft/d] Groundwater Flux: 1.6 [ft2/d]

Source Characteristics Chloride Load:: 7 [kg/m2] Max. length of the spill in direction of GW flow:: 100 [ft]

Soil Profiles Surface Layer: Caliche Soil Profile: P7 - Sandy Clay (1) + Caliche (1) + Medium Sand (1)



## Max Concentration 151.556 [mg/L] at time 79.033 Year



# Appendix C



August 29, 2013

ERIC GARCIA SOUTHWEST ROYALTIES 6 DESTA DRIVE, SUITE 2100 MIDLAND, TX 79705

RE: JENNA COM

Enclosed are the results of analyses for samples received by the laboratory on 08/23/13 8:30.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at <a href="https://www.tceq.texas.gov/field/ga/lab\_accred\_certif.html">www.tceq.texas.gov/field/ga/lab\_accred\_certif.html</a>.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keine

Celey D. Keene Lab Director/Quality Manager



SOUTHWEST ROYALTIES ERIC GARCIA 6 DESTA DRIVE, SUITE 2100 MIDLAND TX, 79705 Fax To: NOT GIVEN

Received:	08/23/2013	Sampling Date:	08/22/2013
Reported:	08/29/2013	Sampling Type:	Soil
Project Name:	JENNA COM	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

## Sample ID: T1-12 (H302025-01)

Chloride, SM4500Cl-B	mg/	′kg	Analyze	d By: DW					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1890	16.0	08/28/2013	ND	400	100	400	0.00	
TPH 8015M		′kg	Analyzed By: AR/						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/28/2013	ND	169	84.4	200	3.72	
DRO >C10-C28	<10.0	10.0	08/28/2013	ND	162	81.2	200	5.75	
EXT DRO >C28-C35	<10.0	10.0	08/28/2013	ND					
Surrogate: 1-Chlorooctane	: 1-Chlorooctane 80.6 % 65.2-14		0						
Surrogate: 1-Chlorooctadecane	85.4	% 63.6-15	4						

## Sample ID: T2-2 (H302025-02)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: DW					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	432	16.0	08/28/2013	ND	400	100	400	0.00	
TPH 8015M	mg/kg		Analyzed By: AR/						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/28/2013	ND	169	84.4	200	3.72	
DRO >C10-C28	<10.0	10.0	08/28/2013	ND	162	81.2	200	5.75	
EXT DRO >C28-C35	<10.0	10.0	08/28/2013	ND					
Surrogate: 1-Chlorooctane	80.6	% 65.2-14	0						
Surrogate: 1-Chlorooctadecane	86.6	% 63.6-15	4						

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#### \*=Accredited Analyte

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Celey D. Keine

Celey D. Keene, Lab Director/Quality Manager



SOUTHWEST ROYALTIES ERIC GARCIA 6 DESTA DRIVE, SUITE 2100 MIDLAND TX, 79705 Fax To: NOT GIVEN

Received:	08/23/2013	Sampling Date:	08/22/2013
Reported:	08/29/2013	Sampling Type:	Soil
Project Name:	JENNA COM	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

### Sample ID: T1-8 (H302025-03)

Chloride, SM4500Cl-B	mg,	'kg	Analyze	d By: DW					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	3560	16.0	08/28/2013	ND	400	100	400	0.00	
TPH 8015M	mg/	/kg Analy		yzed By: AR/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/28/2013	ND	169	84.4	200	3.72	
DRO >C10-C28	<10.0	10.0	08/28/2013	ND	162	81.2	200	5.75	
EXT DRO >C28-C35	<10.0	10.0	08/28/2013	ND					
Surrogate: 1-Chlorooctane	73.7	% 65.2-14	0						
Surrogate: 1-Chlorooctadecane	80.4	% 63.6-15	4						

## Sample ID: T1-10 (H302025-04)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: DW					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	3080	16.0	08/28/2013	ND	400	100	400	0.00	
TPH 8015M	mg/kg		Analyzed By: AR/						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/28/2013	ND	169	84.4	200	3.72	
DRO >C10-C28	<10.0	10.0	08/28/2013	ND	162	81.2	200	5.75	
EXT DRO >C28-C35	<10.0	10.0	08/28/2013	ND					
Surrogate: 1-Chlorooctane	80.7	% 65.2-14	0						
Surrogate: 1-Chlorooctadecane	86.6	% 63.6-15	4						

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Celey D. Keine

Celey D. Keene, Lab Director/Quality Manager



SOUTHWEST ROYALTIES ERIC GARCIA 6 DESTA DRIVE, SUITE 2100 MIDLAND TX, 79705 Fax To: NOT GIVEN

Received:	08/23/2013	Sampling Date:	08/22/2013
Reported:	08/29/2013	Sampling Type:	Soil
Project Name:	JENNA COM	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

### Sample ID: T1-2 (H302025-05)

Chloride, SM4500Cl-B	mg,	'kg	Analyze	d By: DW					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	3800	16.0	08/28/2013	ND	400	100	400	0.00	
TPH 8015M	mg/kg		Analyzed By: AR/						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/28/2013	ND	169	84.4	200	3.72	
DRO >C10-C28	<10.0	10.0	08/28/2013	ND	162	81.2	200	5.75	
EXT DRO >C28-C35	<10.0	10.0	08/28/2013	ND					
Surrogate: 1-Chlorooctane	80.9	% 65.2-14	0						
Surrogate: 1-Chlorooctadecane	83.6	% 63.6-15	4						

## Sample ID: T2-5 (H302025-06)

Chloride, SM4500CI-B	mg,	/kg	Analyze	d By: DW					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1940	16.0	08/28/2013	ND	400	100	400	0.00	
TPH 8015M	mg,	/kg	Analyzed By: AR/						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/28/2013	ND	169	84.4	200	3.72	
DRO >C10-C28	<10.0	10.0	08/28/2013	ND	162	81.2	200	5.75	
EXT DRO >C28-C35	<10.0	10.0	08/28/2013	ND					
Surrogate: 1-Chlorooctane	84.7	% 65.2-14	0						
Surrogate: 1-Chlorooctadecane	89.9	% 63.6-15	4						

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Celey D. Keine

Celey D. Keene, Lab Director/Quality Manager



SOUTHWEST ROYALTIES ERIC GARCIA 6 DESTA DRIVE, SUITE 2100 MIDLAND TX, 79705 Fax To: NOT GIVEN

Received:	08/23/2013	Sampling Date:	08/22/2013
Reported:	08/29/2013	Sampling Type:	Soil
Project Name:	JENNA COM	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

## Sample ID: T1-4 (H302025-07)

Chloride, SM4500CI-B	mg/	/kg	Analyze	d By: DW					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	4760	16.0	08/28/2013	ND	400	100	400	0.00	
TPH 8015M	mg/	′kg	Analyze	d By: AR/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/28/2013	ND	169	84.4	200	3.72	
DRO >C10-C28	<10.0	10.0	08/28/2013	ND	162	81.2	200	5.75	
EXT DRO >C28-C35	<10.0	10.0	08/28/2013	ND					
Surrogate: 1-Chlorooctane	80.3	% 65.2-14	0						
Surrogate: 1-Chlorooctadecane	85.9	% 63.6-15	4						

## Sample ID: T1-6 (H302025-08)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: DW					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	3160	16.0	08/28/2013	ND	400	100	400	0.00	
TPH 8015M	mg	/kg	Analyze	d By: AR/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/28/2013	ND	169	84.4	200	3.72	
DRO >C10-C28	<10.0	10.0	08/28/2013	ND	162	81.2	200	5.75	
EXT DRO >C28-C35	<10.0	10.0	08/28/2013	ND					
Surrogate: 1-Chlorooctane	86.4	% 65.2-14	0						
Surrogate: 1-Chlorooctadecane	94.8	% 63.6-15	4						

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Celey D. Keine

Celey D. Keene, Lab Director/Quality Manager



## **Notes and Definitions**

- ND
   Analyte NOT DETECTED at or above the reporting limit

   RPD
   Relative Percent Difference
- \*\* Samples not received at proper temperature of 6°C or below.
- \*\*\* Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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Celey D. Keine

Celey D. Keene, Lab Director/Quality Manager

t Cardinal cannot accept verbal changes. Please fax written changes to	Delivered By: (Circle One)       Sample Cond         Sampler - UPS - Bus - Other:       Image: Cool Intact         Image: Cool Intact       Image: Cool Intact         Ima	Relinquished By: Date: Received By:	Relinquished By:	r_tcPset NV if: Learning and usingges, variants atoming and clients exclusive tendent for any dam disting whether based in orth analyses. All claims including those for neglogence and any other cause whatsoever shall be deemed walved unless made in writing service. In no event shall Cardinal be liable for incidential or consequential damages, including without limitation, business interruption <u>affiliates or successors arising out of or relayed to the performance of services betwinder by Cardinal, respaces of whether such dat</u>	8 71-6	7 7-0 8-1	S F/-2	u 7/-/0 5	3720		H302025	Lab I.D. Sample I.D.	(C)OMF ERS ATER ER		Sampler Name: 1200 1540 WA	Project Location: Tank (sun	Project Name: TPANG (sin	Project #: Project Owner:	Phone #: Fax #:	City: 77/1/1 State: 75 Zip: 79.705	Address: La Dorta Drusta Suita 6700	Project Manager: And Son Contraction of the Street of the	Company Name: C. H. 12 1 12 12 333-24/6	101 East Marland, Hobbs, NM 88240		Laboratories	CARDINAL
0 (575) 393-2326	lilion CHECKED BY: es (Intrials) No	Cannon C	Phone R Fax Resi	act or tort, shall be limited to the amount paid by the client and received by Cardinal within 30 days after completion he, loes of use, or loss of profits incurred by client, the subsit im is based upon any of the above stated reasons or other	V 3/22 10 Den	1 22/2 1. 19/12 1. 19/12 1. 19/12 1. 19/12 1. 19/12 1. 19/12 1. 19/12 1. 19/12 1. 19/12 1. 19/12 1. 19/12 1. 19	1/ 8/22 /11 cm	1 3/22 11:20-	11 201 1 m	V 202 11:20		DGE IER : D/BASE: / COOL ER :		PRESERV. SAMPLING	Fax #:	Phone #:	State: Zip:	City:	Address:	Attn:	Company:	P.O. #: Software			<u>CHAI</u>		
		Gmeil Ercquein 120 Hotmuller.	lesult: □ Yes □ No   Add'  Phone #: ult: □ Yes □ No   Add'  Fax #: KS:	for the of the applicable Iolaries,								<u>Ch</u> Dla Dla Na													N-OF-CUSTODY AND ANALYSIS REQUEST		

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Page 7 of 7



August 19, 2013

RANDALL HICKS R T HICKS CONSULTANTS 901 RIO GRANDE BLVD SUITE F-142 ALBUQUERQUE, NM 87104

**RE: JENNA COM** 

Enclosed are the results of analyses for samples received by the laboratory on 08/09/13 7:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at <a href="https://www.tceq.texas.gov/field/ga/lab\_accred\_certif.html">www.tceq.texas.gov/field/ga/lab\_accred\_certif.html</a>.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celez D. Keine

Celey D. Keene Lab Director/Quality Manager



R T HICKS CONSULT 901 RIO GRANDE BL ALBUQUERQUE NM, 8	ANTS VD SUITE F-142 87104	Proje Project Numb Project Manag Fax ⊺	ct: JENNA COM er: NONE GIVEN er: RANDALL HICKS Fo: NONE	Reported: 19-Aug-13 15:57
Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
PILE TOP PILE BOTTOM	H301878-01 H301878-02	Soil Soil	08-Aug-13 00:00 08-Aug-13 00:00	09-Aug-13 07:00 09-Aug-13 07:00

#### **Cardinal Laboratories**

## \*=Accredited Analyte

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Celey D. Keine

Celey D. Keene, Lab Director/Quality Manager



	R T HICKS CONSULTANTS 901 RIO GRANDE BLVD SUITE F-142 ALBUQUERQUE NM, 87104		Proj Project Num Project Mana Fax	ect: JEN ber: NO ger: RAN To: NO	ina com Ne given Ndall Hick Ne	Ś		1	Reported: 9-Aug-13 15:	57
			PI H3018	LE TOP 878-01 (Se	oil)					
	Analyte	Result	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
			Cardina	l Labora	tories					
h	norganic Compounds									
c	hloride	3480	16.0	mg/kg	4	3081308	AP	13-Aug-13	4500-Cl-B	
Р	etroleum Hydrocarbons by GC FID									
G	RO C6-C10	ND	10.0	mg/kg	1	3081211	DW	13-Aug-13	8015B	
D	RO >C10-C28	270	10.0	mg/kg	1	3081211	DW	13-Aug-13	8015B	
E	XT DRO >C28-C35	135	10.0	mg/kg	1	3081211	DW	13-Aug-13	8015B	
Sı	irrogate: 1-Chlorooctane		85.6 %	65.2	-140	3081211	DW	13-Aug-13	8015B	
Sı	rrogate: 1-Chlorooctadecane		107 %	63.6	-154	3081211	DW	13-Aug-13	8015B	
v	olatile Organic Compounds by EPA Method	8260B								
B	enzene*	ND	0.050	mg/kg	50	3081405	MS	14-Aug-13	8260B	
Т	oluene*	ND	0.050	mg/kg	50	3081405	MS	14-Aug-13	8260B	
E	thylbenzene*	ND	0.050	mg/kg	50	3081405	MS	14-Aug-13	8260B	
T	otal Xylenes*	ND	0.150	mg/kg	50	3081405	MS	14-Aug-13	8260B	
T	otal BTEX	ND	0.300	mg/kg	50	3081405	MS	14-Aug-13	8260B	
Sı	urrogate: Dibromofluoromethane		95.9 %	61.3	-142	3081405	MS	14-Aug-13	8260B	
Sı	urrogate: Toluene-d8		101 %	71.3	-129	3081405	MS	14-Aug-13	8260B	
Sı	urrogate: 4-Bromofluorobenzene		105 %	65.7	-141	3081405	MS	14-Aug-13	8260B	
0	organic Compounds									
Т	PH 418.1	1610	100	mg/kg	10	3081609	СК	16-Aug-13	418.1	

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Celey D. Keine

Celey D. Keene, Lab Director/Quality Manager



	R T HICKS CONSULTANTS 901 RIO GRANDE BLVD SUITE F-142 ALBUQUERQUE NM, 87104		Proj Project Num Project Mana Fax	ject: JEN ber: NO ger: RAN To: NO	ina com Ne given Ndall Hich Ne	KS		1	Reported: 9-Aug-13 15:	57
			PILE H3018	BOTTC 378-02 (Se	DM oil)					
	Analyte	Result	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
			Cardina	l Labora	tories					
h	norganic Compounds									
С	hloride	2800	16.0	mg/kg	4	3081308	AP	13-Aug-13	4500-Cl-B	
Р	etroleum Hydrocarbons by GC FID									
G	RO C6-C10	ND	10.0	mg/kg	1	3081211	DW	13-Aug-13	8015B	
D	PRO >C10-C28	333	10.0	mg/kg	1	3081211	DW	13-Aug-13	8015B	
E	XT DRO >C28-C35	121	10.0	mg/kg	1	3081211	DW	13-Aug-13	8015B	
Sı	urrogate: 1-Chlorooctane		86.0 %	65.2	2-140	3081211	DW	13-Aug-13	8015B	
Sı	urrogate: 1-Chlorooctadecane		111 %	63.6	6-154	3081211	DW	13-Aug-13	8015B	
v	alatile Organic Compounds by EPA Meth	od 8260B								
B	enzene*	ND	0.050	mg/kg	50	3081405	MS	14-Aug-13	8260B	
Т	oluene*	ND	0.050	mg/kg	50	3081405	MS	14-Aug-13	8260B	
E	thylbenzene*	ND	0.050	mg/kg	50	3081405	MS	14-Aug-13	8260B	
T	otal Xylenes*	ND	0.150	mg/kg	50	3081405	MS	14-Aug-13	8260B	
T	otal BTEX	ND	0.300	mg/kg	50	3081405	MS	14-Aug-13	8260B	
Sı	urrogate: Dibromofluoromethane		96.0 %	61.3	8-142	3081405	MS	14-Aug-13	8260B	
Sı	urrogate: Toluene-d8		103 %	71.3	-129	3081405	MS	14-Aug-13	8260B	
Sı	urrogate: 4-Bromofluorobenzene		106 %	65.7	7-141	3081405	MS	14-Aug-13	8260B	
0	Organic Compounds									
Т	РН 418.1	2300	100	mg/kg	10	3081609	СК	16-Aug-13	418.1	

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Celey D. Keene, Lab Director/Quality Manager



R T HICKS CONSULTANTS 901 RIO GRANDE BLVD SUITE F-142 P ALBUQUERQUE NM, 87104 Pr	Project: JENNA COM oject Number: NONE GIVEN ject Manager: RANDALL HICKS Fax To: NONE	Reported: 19-Aug-13 15:57
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## **Inorganic Compounds - Quality Control**

## **Cardinal Laboratories**

		Reporting		Spike	Source		%REC		RPD	
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch 3081308 - 1:4 DI Water										
Blank (3081308-BLK1)				Prepared &	Analyzed:	13-Aug-13				
Chloride	ND	16.0	mg/kg							
LCS (3081308-BS1)				Prepared &	Analyzed:	13-Aug-13				
Chloride	432	16.0	mg/kg	400		108	80-120			
LCS Dup (3081308-BSD1)				Prepared &	Analyzed:	13-Aug-13				
Chloride	416	16.0	mg/kg	400		104	80-120	3.77	20	

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R T HICKS CONSULTANTS 901 RIO GRANDE BLVD SUITE F-1 ALBUQUERQUE NM, 87104	142	P Project Nu Project Ma F	Project: umber: inager: Fax To:	Jenna Com None Give Randall H None	I N ICKS			19-	Reported: Aug-13 1	5:57
	Petroleum 1	Hydrocarbo Cardir	ons by nal Lal	GC FID - ( boratories	Quality C	ontrol				
		Carun								
Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 3081211 - General Prep - Orga	anics									
Blank (3081211-BLK1)				Prepared:	12-Aug-13	Analyzed: 1	3-Aug-13			
GRO C6-C10	ND	10.0	mg/kg							
DRO >C10-C28	ND	10.0	mg/kg							
EXT DRO >C28-C35	ND	10.0	mg/kg							
Total TPH C6-C28	ND	10.0	mg/kg							
Surrogate: 1-Chlorooctane	47.4		mg/kg	50.0		94.8	65.2-140			
Surrogate: 1-Chlorooctadecane	53.4		mg/kg	50.0		107	63.6-154			
LCS (3081211-BS1)				Prepared:	12-Aug-13	Analyzed: 1	3-Aug-13			

176

186

362

48.2

52.6

183

192

374

50.5

55.1

10.0

10.0

10.0

10.0

10.0

10.0

mg/kg

200

200

400

50.0

50.0

200

200

400

50.0

50.0

88.0

93.0

90.5

96.5

105

91.3

95.8

93.5

101

110

Prepared: 12-Aug-13 Analyzed: 13-Aug-13

66.4-124

61.6-132

69.7-122

65.2-140

63.6-154

66.4-124

61.6-132

69.7-122

65.2-140

63.6-154

#### **Cardinal Laboratories**

GRO C6-C10

GRO C6-C10

DRO >C10-C28

Total TPH C6-C28

Surrogate: 1-Chlorooctane

Surrogate: 1-Chlorooctadecane

DRO >C10-C28

Total TPH C6-C28

Surrogate: 1-Chlorooctane

Surrogate: 1-Chlorooctadecane

LCS Dup (3081211-BSD1)

#### \*=Accredited Analyte

23.4

23.1

20.6

3.63

2.90

3.26

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Celey D. Keene, Lab Director/Quality Manager



	R T HICKS CONSULTANTS 901 RIO GRANDE BLVD SUITE F-142 ALBUQUERQUE NM, 87104		F Project Ni Project Ma F	Project: umber: nager: Fax To:	Jenna Com None Give Randall H None	N ICKS			ا 19-	Reported: Aug-13 1	5:57
	Volatile	e Organic C	ompounds Condit	by EPA	A Method 82	260B - Q	uality Co	ontrol			
			Cardin		Doratories						
A	analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
B	atch 3081405 - Volatiles										
B	lank (3081405-BLK1)				Prepared &	Analyzed:	14-Aug-13	3			
B	enzene	ND	0.050	mg/kg							
Тс	oluene	ND	0.050	mg/kg							
Et	thylbenzene	ND	0.050	mg/kg							
To	otal Xylenes	ND	0.150	mg/kg							
Тс	otal BTEX	ND	0.300	mg/kg							
Sı	urrogate: Dibromofluoromethane	0.478		mg/kg	0.500		95.5	61.3-142			
Sı	urrogate: Toluene-d8	0.513		mg/kg	0.500		103	71.3-129			
Sı	urrogate: 4-Bromofluorobenzene	0.514		mg/kg	0.500		103	65.7-141			
L	CS (3081405-BS1)				Prepared &	Analyzed:	14-Aug-13	3			
B	enzene	2.15	0.050	mg/kg	2.00		107	76.8-122			
Тс	bluene	2.18	0.050	mg/kg	2.00		109	73.1-129			
Et	thylbenzene	2.14	0.050	mg/kg	2.00		107	72.8-128			
m	+p - Xylene	4.27	0.100	mg/kg				69.4-129			
0-	Xvlene	2.13	0.050	mg/kg	2.00		106	70.3-126			
Тс	otal Xylenes	6.39	0.150	mg/kg	6.00		107	72-127			
Sı	urrogate: Dibromofluoromethane	0.472		mg/kg	0.500		94.4	61.3-142			
Sı	urrogate: Toluene-d8	0.516		mg/kg	0.500		103	71.3-129			
Sı	urrogate: 4-Bromofluorobenzene	0.513		mg/kg	0.500		103	65.7-141			
L	CS Dup (3081405-BSD1)				Prepared &	Analyzed:	14-Aug-13	3			
B	enzene	2.21	0.050	mg/kg	2.00		111	76.8-122	3.13	18.7	
To	bluene	2.26	0.050	mg/kg	2.00		113	73.1-129	3.47	19.4	
Et	thylbenzene	2.22	0.050	mg/kg	2.00		111	72.8-128	3.45	21.8	
m	+p - Xylene	4.41	0.100	mg/kg				69.4-129	3.39	25.3	
0-	Xylene	2.19	0.050	mg/kg	2.00		109	70.3-126	2.79	23.6	
To	otal Xylenes	6.60	0.150	mg/kg	6.00		110	72-127	3.19	23.2	
Sı	urrogate: Dibromofluoromethane	0.481		mg/kg	0.500		96.2	61.3-142			
Sı	urrogate: Toluene-d8	0.512		mg/kg	0.500		102	71.3-129			
Sı	urrogate: 4-Bromofluorobenzene	0.526		mg/kg	0.500		105	65.7-141			

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Celey D. Keine

Celey D. Keene, Lab Director/Quality Manager



R T HICKS CONSULTANTS 901 RIO GRANDE BLVD SUITE F-142 ALBUQUERQUE NM, 87104		P Project Nu Project Ma F	Project: umber: inager: <sup>-</sup> ax To:	Jenna com None give Randall H None	I N ICKS			19-	Reported: Aug-13 15	5:57
	Or	ganic Comj Cardir	pounds nal Lab	- Quality ( poratories	Control					
Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 3081609 - Solvent Extraction										
Blank (3081609-BLK1)				Prepared &	Analyzed:	16-Aug-13				
TPH 418.1	ND	100	mg/kg	*	•					
LCS (3081609-BS1)				Prepared &	Analyzed:	16-Aug-13				
TPH 418.1	5200	100	mg/kg	5000		104	80-120			
LCS Dup (3081609-BSD1)				Prepared &	Analyzed:	16-Aug-13				
TPH 418.1	5700	100	mg/kg	5000		114	80-120	9.17	20	

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Celey D. Keene, Lab Director/Quality Manager

Page 8 of 10



## **Notes and Definitions**

- ND
   Analyte NOT DETECTED at or above the reporting limit

   RPD
   Relative Percent Difference

   \*\*
   Samples not received at proper temperature of 6°C or below.

   \*\*\*
   Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
   Samples reported on an as received basis (wet) unless otherwise noted on report

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Celey D. Keine

Celey D. Keene, Lab Director/Quality Manager

Sampler - UPS	Delivered By:	-	Relinquished By		Reling <del>uj</del> shed By	service. In no event shall Ca affiliates or successors arisin	PLEASE NOTE: Liability an analyses. All claims including	14 - 14 - 18 - 19 - 1						ف		H SOIX L	Lab I.D.		FOR LAB USE ONLY	Sampler Name:	Project Location	Project Name:	Project #:	Phone #: 200	city: ALBUG	Address: 901	Project Manager	Company Name:		·		
- Bus - Other:	(Circle One)		4			rdinal be liable for incidental or cons g out of or related to the performanc	d Damages. Cardinal's liability and cl a those for nealigence and any other							PILE 30TOM	PLLE TOK		Sample I			Kanlati It	EDOX (	Jenna Com	ina Gam	238-9515/503	NARVE	RID GRADE N	Randall the	P.T.HICKS	01 East Marland, H 575) 393-2326 FAX	ĸ	abora	P フ フ し
	- -	Time:	7:00~.~	Time:	Date:	equental damages, including e of services here <u>under by C</u>	ient's exclusive remedy for a cause whatsoever shall be		-								D		×	chr	28		Project Owner	Fax #:	State: NM	w Shire	Z	CONSULTAN	lobbs, NM 882 (575) 393-247(		tori	Z
	Sample		Received By:	5	Received By:	y without limitation, business in ardinal, regardless of whether	iny claim arising whether based deemed waived unless made it							C 22	02	(G) # ( GF W/ SC	RAB OR ONTAIN OUNDW STEWA	(C)OM ERS ATER TER	IP.				: CAYON WILLIG		Zip: Stoy	1-142-		2	<b>3</b> 4	v	ς Γ	
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Page 10 of 10



August 15, 2013

RANDALL HICKS R T HICKS CONSULTANTS 901 RIO GRANDE BLVD SUITE F-142 ALBUQUERQUE, NM 87104

RE: JENNA COM

Enclosed are the results of analyses for samples received by the laboratory on 08/09/13 7:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at <a href="https://www.tceq.texas.gov/field/ga/lab\_accred\_certif.html">www.tceq.texas.gov/field/ga/lab\_accred\_certif.html</a>.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keine

Celey D. Keene Lab Director/Quality Manager



R T HICKS CONSULTANTS RANDALL HICKS 901 RIO GRANDE BLVD SUITE F-142 ALBUQUERQUE NM, 87104 Fax To: NONE

Received:	08/09/2013	Sampling Date:	08/07/2013
Reported:	08/15/2013	Sampling Type:	Soil
Project Name:	JENNA COM	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Daniel Wade
Project Location:	EDDY COUNTY		

## Sample ID: A1 (H301877-01)

Chloride, SM4500Cl-B	mg/	kg	Analyzed	By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	4240	16.0	08/14/2013	ND	432	108	400	3.77	

#### Sample ID: A2 (H301877-02)

Chloride, SM4500CI-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	6480	16.0	08/13/2013	ND	432	108	400	3.64	

#### Sample ID: A3 (H301877-03)

Chloride, SM4500CI-B	mg/kg		Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1280	16.0	08/13/2013	ND	432	108	400	3.64	

## Sample ID: B1 (H301877-04)

Chloride, SM4500CI-B	mg,	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	4680	16.0	08/13/2013	ND	432	108	400	3.64	

#### **Cardinal Laboratories**

#### \*=Accredited Analyte

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Celey D. Keine

Celey D. Keene, Lab Director/Quality Manager



R T HICKS CONSULTANTS RANDALL HICKS 901 RIO GRANDE BLVD SUITE F-142 ALBUQUERQUE NM, 87104 Fax To: NONE

Received:	08/09/2013	Sampling Date:	08/07/2013
Reported:	08/15/2013	Sampling Type:	Soil
Project Name:	JENNA COM	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Daniel Wade
Project Location:	EDDY COUNTY		

### Sample ID: B2 (H301877-05)

Chloride, SM4500Cl-B	mg/l	kg	Analyzed	By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2600	16.0	08/13/2013	ND	432	108	400	3.64	

## Sample ID: B3 (H301877-06)

Chloride, SM4500CI-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	304	16.0	08/13/2013	ND	432	108	400	3.64	

## Sample ID: C1 (H301877-07)

Chloride, SM4500CI-B	mg/kg		Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2440	16.0	08/13/2013	ND	432	108	400	3.64	

#### Sample ID: C2 (H301877-08)

Chloride, SM4500Cl-B	mg/kg		Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1680	16.0	08/13/2013	ND	432	108	400	3.64	

#### Sample ID: C3 (H301877-09)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	400	16.0	08/13/2013	ND	432	108	400	3.64	

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Celey D. Keine

Celey D. Keene, Lab Director/Quality Manager



R T HICKS CONSULTANTS RANDALL HICKS 901 RIO GRANDE BLVD SUITE F-142 ALBUQUERQUE NM, 87104 Fax To: NONE

Received:	08/09/2013
Reported:	08/15/2013
Project Name:	JENNA COM
Project Number:	NONE GIVEN
Project Location:	EDDY COUNTY

Sampling Date:	08/07/2013
Sampling Type:	Soil
Sampling Condition:	Cool & Intact
Sample Received By:	Daniel Wade

## Sample ID: EAST OF ROAD (H301877-10)

Chloride, SM4500Cl-B	mg/	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1500	16.0	08/13/2013	ND	432	108	400	3.64	

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Celey D. Keine

Celey D. Keene, Lab Director/Quality Manager



## **Notes and Definitions**

- ND
   Analyte NOT DETECTED at or above the reporting limit

   RPD
   Relative Percent Difference
- \*\* Samples not received at proper temperature of 6°C or below.
- \*\*\* Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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Celey D. Keine

Celey D. Keene, Lab Director/Quality Manager

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Page 6 of 6

# Appendix D

## Project: JennaOn-SiteBioremediation

Path: P:\Clayton Williams\JennaCom\Correspond\JennaOn-SiteBioremediation.ami Date: 9/16/2013 Units: English (inches) Climate: Arid Hot (NM/W.Texas, Hobbs) Plant Uptake Trigger: 1% Input Concentration

Groundwater Characteristics Background Cl Concentration in Aquifer: 100 [mg/L] Aquifer porosity: 0.3 [-] Groundwater Table Depth: 70 [ft] Aquifer Thickness: 20 [ft] Slope of Water Table: 0.004 [-] Hydraulic Conductivity: 20 [ft/d] Groundwater Flux: 1.6 [ft2/d]

Source Characteristics Chloride Load:: 3.5 [kg/m2] Max. length of the spill in direction of GW flow:: 60 [ft]

Soil Profiles Surface Layer: Medium Sand Soil Profile: P7 - Sandy Clay (1) + Caliche (1) + Medium Sand (1)



## Max Concentration 148.958 [mg/L] at time 124.332 Year

