

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural
Resources Department

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Incident ID	NAB1918650901
District RP	2RP-5514
Facility ID	
Application ID	pAB1918650571

Release Notification

Responsible Party

Responsible Party XTO Energy	OGRID 5380
Contact Name Kyle Littrell	Contact Telephone 432-221-7331
Contact email Kyle_Littrell@xtoenergy.com	Incident # (assigned by OCD) NAB1918650901
Contact mailing address 522 W. Mermod, Carlsbad, NM 88220	

Location of Release Source

Latitude 32.641975° Longitude -103.958883°
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Buttercup 27-34 Federal 001H	Site Type Production Well Facility
Date Release Discovered 6/13/2019	API# (if applicable) 30-015-45133

Unit Letter	Section	Township	Range	County
J	22	19S	30E	Eddy

Surface Owner: State Federal Tribal Private (Name: BLM)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of total dissolved solids (TDS) in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input checked="" type="checkbox"/> Other (describe) 1% HCl-	Volume/Weight Released (provide units) 41 barrels	Volume/Weight Recovered (provide units) 40 barrels

Cause of Release

During frac recirculating activities, a valve failed and caused fluid to be pumped back into the acid tank through the top flow circulating line. This caused the tank to overflow into lined containment and onto the well pad. A vacuum truck recovered free standing fluid from the containment. The crew installed isolation valves to correct the failure. Additional third party resources have been retained to assist with remediation. Remediation can begin when frac and flowback completions activities on the well pad are concluded.

Form C-141

State of New Mexico
Oil Conservation Division

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Incident ID	NAB1918650901
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Was this a major release as defined by 19.15.29.7(A) NMAC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? An unauthorized release of a volume of 25 barrels or more
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? Notice provided by Amy Ruth to Mike Bratcher, Rob Hamlet, Victoria Venegas, and Jim Griswold (NMOCD), Jim Amos and Deborah McKinney (BLM), on 6/13/2019 by email	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
If all the actions described above have <u>not</u> been undertaken, explain why: N/A
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.
Printed Name: <u>Kyle Littrell</u> Title: <u>SH&E Supervisor</u> Signature:  Date: <u>6/25/2019</u> email: <u>Kyle.Littrell@xtoenergy.com</u> Telephone: <u>432-221-7331</u>
<u>OCD Only</u> Received by: <u>Amalia Bustamante</u> Date: <u>7/5/2019</u>

Incident ID	NAB1918650901
District RP	2RP-5514
Facility ID	
Application ID	pAB1918650571

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	<u>50-100</u> (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: *Each of the following items must be included in the report.*

- Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- Field data
- Data table of soil contaminant concentration data
- Depth to water determination
- Determination of water sources and significant watercourses within 1/2-mile of the lateral extents of the release
- Boring or excavation logs
- Photographs including date and GIS information
- Topographic/Aerial maps
- Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

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Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.*

- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Kyle Littrell Title: SH&E Supervisor

Signature:  Date: 2/27/2019

email: Kyle_Littrell@xtoenergy.com Telephone: 432-221-7331

OCD Only

Received by: _____ Date: _____

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____



LT Environmental, Inc.

3300 North "A" Street
Building 1, Unit 222
Midland, Texas 79705
432.704.5178

February 27, 2020

Mr. Mike Bratcher
New Mexico Oil Conservation Division
811 South First Street
Artesia, New Mexico 88210

**RE: Closure Request
Buttercup 27-34 Federal 001H
Remediation Permit Number 2RP-5514
Incident Number NAB1918650901
Eddy County, New Mexico**

Dear Mr. Bratcher:

LT Environmental, Inc. (LTE), on behalf of XTO Energy, Inc. (XTO), presents the following Closure Request detailing site assessment and soil sampling activities at the Buttercup 27-34 Federal 001H (Site) in Unit J, Section 22, Township 19 South, Range 30 East, in Eddy County, New Mexico (Figure 1). The purpose of the site assessment and soil sampling activities was to confirm the presence or absence of impacts to soil following a release of hydrochloric acid into lined containment and onto the well pad. Based on field observations, field screening, and laboratory analytical results from soil sampling activities, XTO is submitting this Closure Request and requesting no further action (NFA) for Remediation Permit (RP) Number 2RP-5514.

RELEASE BACKGROUND

On June 13, 2019, during frac recirculating activities, a valve failed and caused fluid to be pumped back into an acid tank through the top flow circulating line, resulting in the release of 41 barrels (bbls) of 1 percent (%) hydrochloric acid into lined containment and onto the caliche well pad. A crew installed isolation valves to correct the failure. Freestanding acid was neutralized and recovered from the containment area at a volume estimated to be approximately 40.0 bbls. XTO reported the release to the New Mexico Oil Conservation Division (NMOCD) on a Release Notification and Corrective Action Form C-141 (Form C-141) on June 25, 2019 and was assigned RP Number 2RP-5514.

SITE CHARACTERIZATION

LTE characterized the Site according to Table 1, *Closure Criteria for Soils Impacted by a Release*, of Title 19, Chapter 15, Part 29, Section 12 (19.15.29.12) of the New Mexico Administrative Code (NMAC). Depth to groundwater at the Site is estimated to be 50 to 100 feet below ground surface (bgs) based on the nearest groundwater well data. The closest permitted groundwater well with depth to groundwater data is the New Mexico Office of the State Engineer (NMOSE) well 00722,



located approximately 1.65 miles southeast of the Site. The groundwater well has a depth to groundwater of approximately 65 feet bgs and a total depth of 350 feet bgs. The closest continuously flowing water or significant watercourse to the Site is an emergent wetland located approximately 2,775 feet east of the Site. The Site is greater than 200 feet from a lakebed, sinkhole, or playa lake and greater than 300 feet from an occupied residence, school, hospital, institution, church, or wetland. The Site is greater than 1,000 feet to a freshwater well or spring and is not within a 100-year floodplain or overlying a subsurface mine. The Site is located in a high potential karst area. The Site receptors are identified on Figure 1.

CLOSURE CRITERIA

Based on the results of the Site Characterization, the following NMOCD Table 1 Closure Criteria (Closure Criteria) apply:

- Benzene: 10 milligrams per kilogram (mg/kg)
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg
- Total petroleum hydrocarbons (TPH): 100 mg/kg
- Chloride: 600 mg/kg

Because the release was an acid with no produced water or hydrocarbons, LTE determined the appropriate analyte to assess impact to soil would be pH. The NMOCD does not have a standard for pH, but values of 7 to 9 standard units (SU) are generally considered neutral. Based on water standards established by the New Mexico Water Quality Control Commission (NMWQCC), specifically in NMAC 20.6.2.3103 B (9), a pH value between 6 and 9 is established as a standard for domestic water supply.

SITE ASSESSMENT AND SOIL SAMPLING ACTIVITIES

Remediation activities at the Site were postponed due to ongoing operations near the release, prohibiting activity due to safety concerns. Per 19.15.29.12.B.(1) NMAC, an extension for submission of a Remediation Plan or Closure Request was granted. The initial extension was requested and approved on September 9, 2019.

Once operations were completed, LTE personnel evaluated the release extent outside of the containment based on information provided on Form C-141 and visual observations. On January 21, 2020 LTE personnel collected three preliminary soil samples (SS01 through SS03) within the release extent from a depth of approximately 0.5 feet bgs to assess the presence or absence of soil impacts at the ground surface. The release extent and preliminary soil sample locations were mapped utilizing a handheld Global Positioning System (GPS) unit and are depicted on Figure 2.

The soil samples were placed directly into pre-cleaned glass jars, labeled with the location, date, time, sampler name, method of analysis, and immediately placed on ice. The soil samples were



shipped at or below 4 degrees Celsius (°C) under strict chain-of-custody (COC) procedures to Xenco Laboratories (Xenco) in Carlsbad, New Mexico, for analysis of pH following United States Environmental Protection Agency (EPA) Method 9045D.

Based on laboratory analytical results for the preliminary soil samples SS01 through SS03, excavation activities did not appear to be warranted; however, additional assessment activities were scheduled to further confirm the absence of impacted soil. Photographic documentation was conducted during the Site visit. Photographic logs are included in Attachment 1.

On January 27, 2020, LTE personnel returned to the Site to oversee additional soil assessment activities. Three boreholes (BH01 through BH03) were advanced via hand-auger, to a depth of approximately two feet bgs within the release extent. Boreholes BH01 through BH03 were advanced at the SS01 through SS03 preliminary soil sample locations. In addition, one background sample (BG01/BG01A) was advanced via hand-auger to a depth of approximately 0.5 feet bgs and two feet bgs. Observations for each borehole were logged on lithologic/soil sampling logs, which are included in Attachment 2. The delineation soil samples were collected, handled, and analyzed as described above at Xenco in Carlsbad, New Mexico. All boreholes were backfilled with the same soil removed. The preliminary soil sample and borehole delineation sample locations are depicted on Figure 2.

ANALYTICAL RESULTS

Laboratory analytical results in preliminary soil samples SS01 through SS03, collected at approximately 0.5 feet bgs, and in delineation soil samples BH01 through BH03, collected at approximately two feet bgs, indicated pH concentrations showed that no remaining acidic concentrations were left within the release area. Sample results ranged from 8.02 to 8.56 SU of pH. The background sample (BG01/BG01A), collected at depths ranging from approximately 0.5 feet bgs to two feet bgs, indicated pH concentrations from 7.97 to 8.52 SU. Laboratory analytical results are presented on Figure 2 and summarized in Table 1. The complete laboratory analytical reports are included as Attachment 3.

CONCLUSIONS

Preliminary soil samples SS01 through SS03 and delineation soil samples BH01 through BH03, were collected from within the release extent from depths ranging from 0.5 feet bgs to two feet bgs to assess for the presence or absence of soil impacts resulting from the release discovered June 13, 2019. Background samples BG01 through BG01A were collected at similar depths from approximately 70 feet away from the release extent. Laboratory analytical results for all soil samples indicated pH values in soil samples were within range of neutral (between 7 and 9 SU) and background conditions and did not indicate any impact to the soil from the release.



Bratcher, M.
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Based on initial response efforts and soil sample laboratory analytical results, no impacted soil was identified, and no soil excavation was required as a result of the hydrochloric acid release. XTO requests NFA for RP Number 2RP-5514.

If you have any questions or comments, please do not hesitate to contact Ms. Ashley Ager at (970) 385-1096.

Sincerely,

LT ENVIRONMENTAL, INC.

A handwritten signature in black ink that reads 'Kalei Jennings'.

Kalei Jennings
Project Environmental Scientist

A handwritten signature in black ink that reads 'Ashley L. Ager'.

Ashley L. Ager, P.G.
Senior Geologist

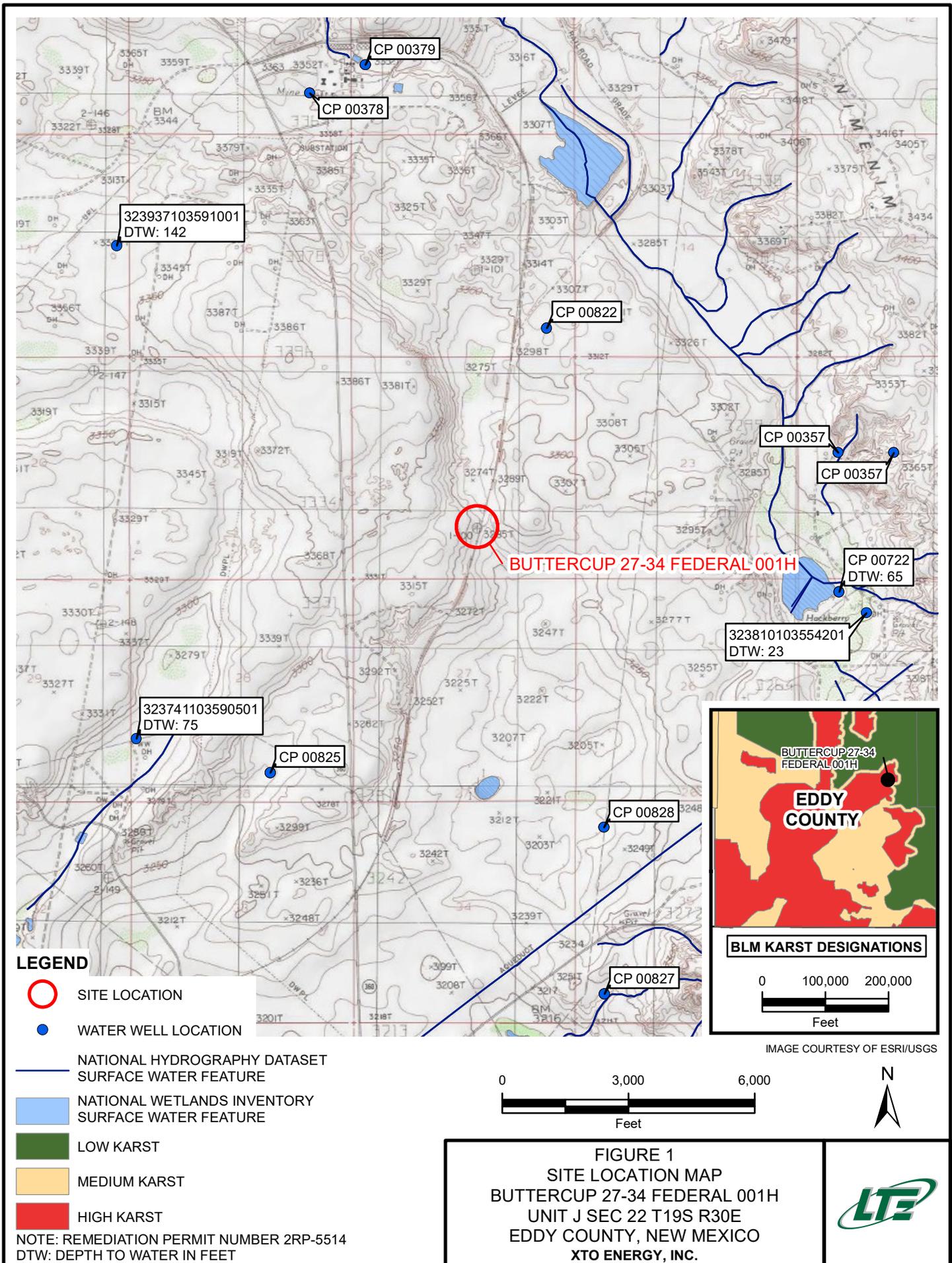
cc: Kyle Littrell, XTO
United States Bureau of Land Management- New Mexico
Robert Hamlet, NMOCD
Victoria Venegas, NMOCD

Appendices:

- Figure 1 Site Location Map
- Figure 2 Soil Sample Locations
- Table 1 Soil Analytical Results
- Attachment 1 Photographic Logs
- Attachment 2 Lithologic/Soil Sampling Logs
- Attachment 3 Laboratory Analytical Reports

FIGURES





SAMPLE ID@DEPTH BELOW GROUND SURFACE (FEET)
SAMPLE DATE
pH: NOT ESTABLISHED (SU)

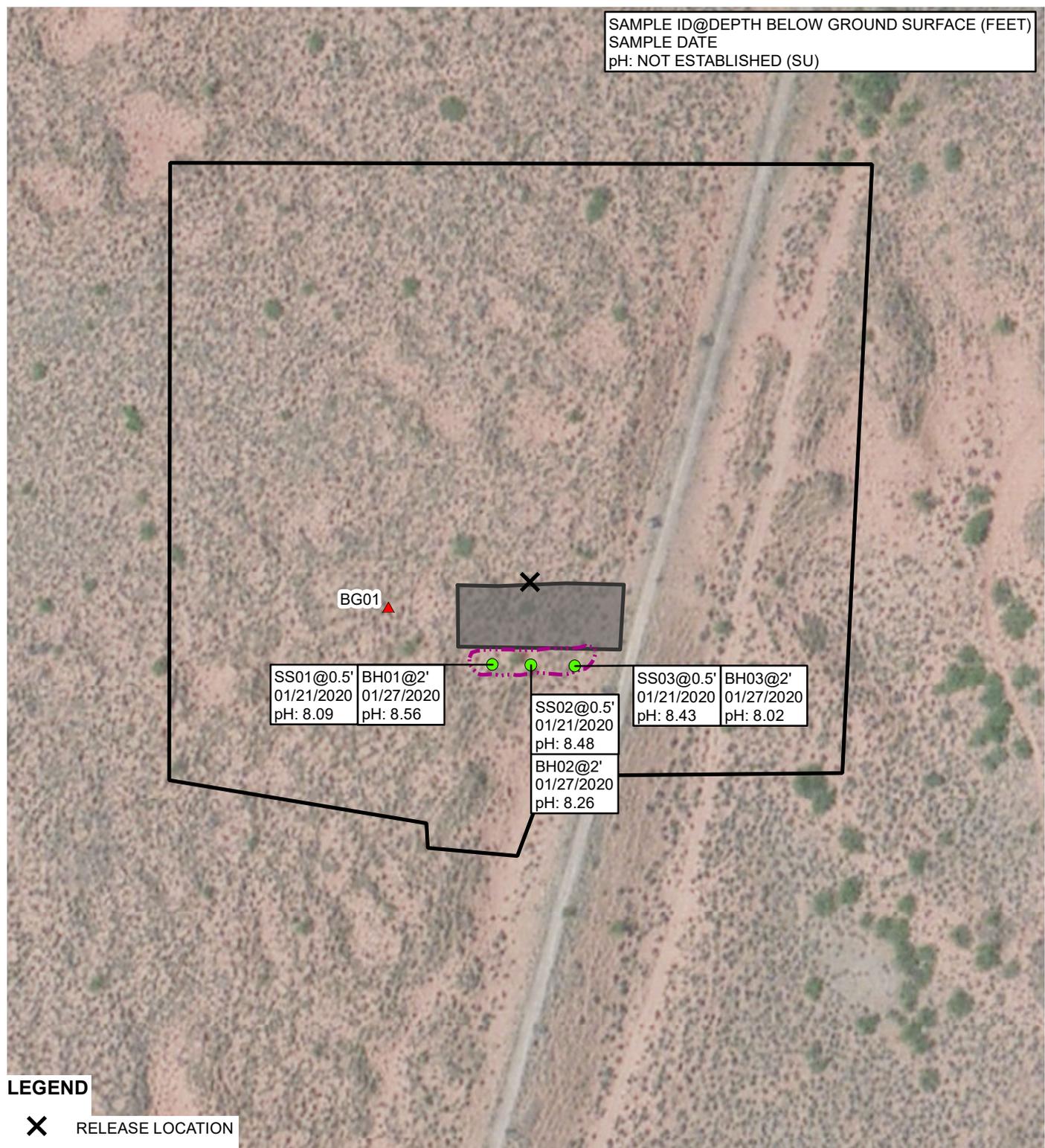


IMAGE COURTESY OF ESRI

LEGEND

- X** RELEASE LOCATION
- SOIL SAMPLE IN COMPLIANCE WITH APPLICABLE CLOSURE CRITERIA
- ▲** BACKGROUND SOIL SAMPLE
- RELEASE EXTENT
- APPROXIMATE PAD BOUNDARY
- CONTAINMENT

pH: POTENTIAL HYDROGEN
SU: STANDARD UNIT

NOTE: REMEDIATION PERMIT NUMBER 2RP-5514

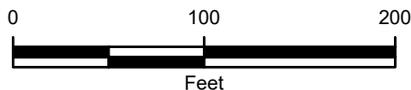


FIGURE 2
SOIL SAMPLE LOCATIONS
 BUTTERCUP 27-34 FEDERAL 001H
 UNIT J SEC 22 T19S R30E
 EDDY COUNTY, NEW MEXICO
 XTO ENERGY, INC.



TABLES



**TABLE 1
SOIL ANALYTICAL RESULTS**

**BUTTERCUP 27-34 FEDERAL 001H
REMEDIATION PERMIT NUMBER 2RP-5514
EDDY COUNTY, NEW MEXICO
XTO ENERGY, INC.**

Sample Name	Sample Depth (feet bgs)	Sample Date	pH in Water (SU)	Temperature (Deg C)
NMOCD Table 1 Closure Criteria			NE	NE
SS01	0.5	01/21/2020	8.09	21.6
SS02	0.5	01/21/2020	8.48	22.4
SS03	0.5	01/21/2020	8.43	22.3
BH01	2.0	01/27/2020	8.56	24.4
BH02	2.0	01/27/2020	8.26	24.3
BH03	2.0	01/27/2020	8.02	24.7
BG01	0.5	01/27/2020	7.97	24.8
BG01A	2	01/27/2020	8.52	24.8

Notes:

bgs - below ground surface

NMAC - New Mexico Administrative Code

NMOCD - New Mexico Oil Conservation Division

NE - not established

SU- standard unit

Deg C- degrees Celsius

Bold - indicates result exceeds the applicable regulatory standard

Table 1 - closure criteria for soils impacted by a release per NMAC 19.15.29 August 2018

ATTACHMENT 1: PHOTOGRAPHIC LOG



PHOTOGRAPHIC LOG



Photograph 1: Southeastern view of release extent.



Photograph 2: Eastern view of release extent.

ATTACHMENT 2: LITHOLOGIC SOIL SAMPLE LOGS





LT Environmental, Inc.
 508 West Stevens Street
 Carlsbad, New Mexico 88220
 Compliance · Engineering · Remediation

Identifier: **BH01**
 Date: **1/27/20**
 Project Name: **Buttercup 27-34 Fed**
 RP Number: **2RP-5514**

LITHOLOGIC / SOIL SAMPLING LOG

Lat/Long: _____ Field Screening: **N/A** Logged By: **JH** Method: **Hand Auger**
 Hole Diameter: **3"** Total Depth: **2.0'**

Comments: **TD @ 2.0'**

1210

Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Depth (ft. bgs.)	Sample Depth	Soil/Rock Type	Lithology/Remarks
					0			
					1			
M			N	BH01	2	2.0'	SPSM ML	Pourly graded red sand with some clay + silt < 10%. No plasticity & no odor.
					3			TD @ 2ft
					4			
					5			
					6			
					7			
					8			
					9			
					10			
					11			
					12			



LT Environmental, Inc.
 508 West Stevens Street
 Carlsbad, New Mexico 88220
 Compliance · Engineering · Remediation

Identifier: BH02	Date: 1/27/20
Project Name: Buttercup 27-34 Fed	RP Number: 2RP-5514
Logged By: JH	Method: Hand Auger
Hole Diameter: 3"	Total Depth: 20'

LITHOLOGIC / SOIL SAMPLING LOG

Lat/Long: _____ Field Screening: **N/A**

Comments: **TD @ 20'**

Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Depth (ft. bgs.)	Sample Depth	Soil/Rock Type	Lithology/Remarks
					0			
					1			caliche
				BH02	2	2.0'	SPSM ML	Poorly graded red sand w/ traces of silt + clay. < 10% combined. No plasticity & No odor
					3			TOE 20'
					4			
					5			
					6			
					7			
					8			
					9			
					10			
					11			
					12			

1230

M

N



LT Environmental, Inc.
 508 West Stevens Street
 Carlsbad, New Mexico 88220

Compliance · Engineering · Remediation

Identifier:

BH03

Date:

1/27/20

Project Name:

Buttercup 27-34
 Fed

RP Number:

2RP-5514

LITHOLOGIC / SOIL SAMPLING LOG

Lat/Long:

Field Screening:

N/A

Logged By: JH

Method:

Hand Auger

Hole Diameter:

3"

Total Depth:

2.0'

Comments:

TD @ 2.0'

1250

Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Depth (ft. bgs.)	Sample Depth	Soil/Rock Type	Lithology/Remarks
					0			
					1			
M			N	BH03	2	2.0'	SM MLL	Red sand (partly silt) with significant silt present approximately 30-40% low plasticity. No odor.
					3			TD @ 2.0'
					4			
					5			
					6			
					7			
					8			
					9			
					10			
					11			
					12			



LT Environmental, Inc.
 508 West Stevens Street
 Carlsbad, New Mexico 88220
 Compliance · Engineering · Remediation

Identifier: **B601**

Date: **1/27/20**

Project Name: **Buttecop 27-34**

RP Number: **2RP-5514**

LITHOLOGIC / SOIL SAMPLING LOG

Logged By: **JH**

Method: **Hand Auger**

Lat/Long:

Field Screening: **None**

Hole Diameter: **3"**

Total Depth: **2'**

Comments: **TD @ 2.0'**

Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Depth (ft. bgs.)	Sample Depth	Soil/Rock Type	Lithology/Remarks
					0			
1140			N	B601	0.5'	0.5'	Caliche	SM ML Well sorted Brown/Red sand with 20-30% grey silt. Caliche present. No plasticity. No odor.
					1		Caliche	
1150			N	B602A	2.0	2.0'	SP	SP: Poorly graded red sand, w/lt clay fines. Finest fine of clay. No plasticity & no odor.
					3			TD @ 2.0'
					4			
					5			
					6			
					7			
					8			
					9			
					10			
					11			
					12			

ATTACHMENT 3: LABORATORY ANALYTICAL REPORTS





Analytical Report 649751

for

LT Environmental, Inc.

Project Manager: Dan Moir

Buttercup 27-34 Fed 001H

01.23.2020

Collected By: Client

**1089 N Canal Street
Carlsbad, NM 88220**

Xenco-Houston (EPA Lab Code: TX00122):
Texas (T104704215-19-30), Arizona (AZ0765), Florida (E871002-24), Louisiana (03054)
Oklahoma (2019-058), North Carolina (681), Arkansas (19-037-0)

Xenco-Dallas (EPA Lab Code: TX01468):
Texas (TX104704295-19-22), Arizona (AZ0809), Arkansas (17-063-0)

Xenco-El Paso (EPA Lab Code: TX00127): Texas (T104704221-19-16)
Xenco-Lubbock (EPA Lab Code: TX00139): Texas (T104704219-19-21)
Xenco-Midland (EPA Lab Code: TX00158): Texas (T104704400-19-19)
Xenco-Carlsbad (LELAP): Louisiana (05092)
Xenco-San Antonio (EPA Lab Code: TNI02385): Texas (T104704534-19-5)
Xenco Phoenix (EPA Lab Code: AZ00901): Arizona (AZ0757)
Xenco-Tampa: Florida (E87429), North Carolina (483)



01.23.2020

Project Manager: **Dan Moir**

LT Environmental, Inc.

4600 W. 60th Avenue

Arvada, CO 80003

Reference: XENCO Report No(s): **649751**

Buttercup 27-34 Fed 001H

Project Address:

Dan Moir:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number(s) 649751. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. The uncertainty of measurement associated with the results of analysis reported is available upon request. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 649751 will be filed for 45 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

A handwritten signature in black ink that reads 'Jessica Kramer'. The signature is written in a cursive, slightly slanted style.

Jessica Kramer

Project Assistant

A Small Business and Minority Company

Houston - Dallas - Midland - Tampa - Phoenix - Lubbock - San Antonio - El Paso - Atlanta - New Mexico



Sample Cross Reference 649751

LT Environmental, Inc., Arvada, CO

Buttercup 27-34 Fed 001H

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
SS01	S	01.21.2020 09:55	0.5 ft	649751-001
SS02	S	01.21.2020 10:00	0.5 ft	649751-002
SS03	S	01.21.2020 10:05	0.5 ft	649751-003



CASE NARRATIVE

Client Name: LT Environmental, Inc.

Project Name: Buttercup 27-34 Fed 001H

Project ID:
Work Order Number(s): 649751

Report Date: 01.23.2020
Date Received: 01.21.2020

Sample receipt non conformances and comments:

Sample receipt non conformances and comments per sample:

None



Certificate of Analysis Summary 649751

LT Environmental, Inc., Arvada, CO

Project Name: Buttercup 27-34 Fed 001H

Project Id:
Contact: Dan Moir
Project Location:

Date Received in Lab: Tue 01.21.2020 11:39
Report Date: 01.23.2020 14:00
Project Manager: Jessica Kramer

Analysis Requested	Lab Id:	649751-001	649751-002	649751-003			
	Field Id:	SS01	SS02	SS03			
	Depth:	0.5- ft	0.5- ft	0.5- ft			
	Matrix:	SOIL	SOIL	SOIL			
	Sampled:	01.21.2020 09:55	01.21.2020 10:00	01.21.2020 10:05			
PH By SW9045D SUB: T104704400-19-19	Extracted:						
	Analyzed:	01.22.2020 12:45	01.22.2020 12:45	01.22.2020 12:45			
	Units/RL:	Deg C RL	Deg C RL	Deg C RL			
Temperature		21.6 +	22.4 +	22.3 +			
PH By SW9045D SUB: T104704400-19-19	Extracted:						
	Analyzed:	01.22.2020 12:45	01.22.2020 12:45	01.22.2020 12:45			
	Units/RL:	SU RL	SU RL	SU RL			
pH in Water		8.09	8.48	8.43			

This analytical report, and the entire data package it represents, has been made for your exclusive and confidential use. The interpretations and results expressed throughout this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories assumes no responsibility and makes no warranty to the end use of the data hereby presented. Our liability is limited to the amount invoiced for this work order unless otherwise agreed to in writing.

Houston - Dallas - Midland - Tampa - Phoenix - Lubbock - San Antonio - El Paso - Atlanta - New Mexico

Jessica Kramer
 Project Assistant



Certificate of Analytical Results 649751

LT Environmental, Inc., Arvada, CO

Buttercup 27-34 Fed 001H

Sample Id: **SS01**
 Lab Sample Id: 649751-001

Matrix: Soil
 Date Collected: 01.21.2020 09:55

Date Received: 01.21.2020 11:39
 Sample Depth: 0.5 ft

Analytical Method: PH By SW9045D

Tech: CHE
 Analyst: CHE
 Seq Number: 3114165

% Moisture:
 Basis: Wet Weight
 SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
pH in Water	12408-02-5	8.09		SU	01.22.2020 12:45		1
Temperature	TEMP	21.6		Deg C	01.22.2020 12:45	+	1



Certificate of Analytical Results 649751

LT Environmental, Inc., Arvada, CO

Buttercup 27-34 Fed 001H

Sample Id: **SS02**
 Lab Sample Id: 649751-002

Matrix: Soil
 Date Collected: 01.21.2020 10:00

Date Received: 01.21.2020 11:39
 Sample Depth: 0.5 ft

Analytical Method: PH By SW9045D

Tech: CHE
 Analyst: CHE
 Seq Number: 3114165

% Moisture:
 Basis: Wet Weight
 SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
pH in Water	12408-02-5	8.48		SU	01.22.2020 12:45		1
Temperature	TEMP	22.4		Deg C	01.22.2020 12:45	+	1



Certificate of Analytical Results 649751

LT Environmental, Inc., Arvada, CO

Buttercup 27-34 Fed 001H

Sample Id: **SS03**
 Lab Sample Id: 649751-003

Matrix: Soil
 Date Collected: 01.21.2020 10:05

Date Received: 01.21.2020 11:39
 Sample Depth: 0.5 ft

Analytical Method: PH By SW9045D

Tech: CHE
 Analyst: CHE
 Seq Number: 3114165

% Moisture:
 Basis: Wet Weight
 SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
pH in Water	12408-02-5	8.43		SU	01.22.2020 12:45		1
Temperature	TEMP	22.3		Deg C	01.22.2020 12:45	+	1



LT Environmental, Inc.

Buttercup 27-34 Fed 001H

Analytical Method: PH By SW9045D

Seq Number: 3114165

Matrix: Soil

Parent Sample Id: 649737-001

MD Sample Id: 649737-001 D

Parameter	Parent Result	MD Result	%RPD	RPD Limit	Units	Analysis Date	Flag
pH in Water	8.07	8.07	0	20	SU	01.22.2020 12:45	
Temperature	21.4	21.5	0	25	Deg C	01.22.2020 12:45	

MS/MSD Percent Recovery
 Relative Percent Difference
 LCS/LCSD Recovery
 Log Difference

$[D] = 100 * (C - A) / B$
 $RPD = 200 * |(C - E) / (C + E)|$
 $[D] = 100 * (C) / [B]$
 Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

LCS = Laboratory Control Sample
 A = Parent Result
 C = MS/LCS Result
 E = MSD/LCSD Result

MS = Matrix Spike
 B = Spike Added
 D = MSD/LCSD % Rec



Inter-Office Shipment

IOS Number 56498

Date/Time: 01/21/20 14:34

Created by: Elizabeth McClellan

Please send report to: Jessica Kramer

Lab# From: **Carlsbad**

Delivery Priority:

Address: 1089 N Canal Street

Lab# To: **Midland**

Air Bill No.:

F-Mail: jessica.kramer@xenco.com

Sample Id	Matrix	Client Sample Id	Sample Collection	Method	Method Name	Lab Due	HT Due	PM	Analytes	Sign
649751-001	S	SS01	01/21/20 09:55	E300_CL	Chloride by EPA 300	HOLD	02/18/20	JKR	CL	
649751-001	S	SS01	01/21/20 09:55	SW8015MOD_NM	TPH by SW8015 Mod	HOLD	02/04/20	JKR	GRO-DRO PHCC10C28 PI	
649751-001	S	SS01	01/21/20 09:55	SW8021B	BTEX by EPA 8021B	HOLD	02/04/20	JKR	BZ BZME EBZ XYLENES	
649751-001	S	SS01	01/21/20 09:55	SW9045D	PH By SW9045D	01/23/20	02/18/20	JKR		
649751-002	S	SS02	01/21/20 10:00	E300_CL	Chloride by EPA 300	HOLD	02/18/20	JKR	CL	
649751-002	S	SS02	01/21/20 10:00	SW8021B	BTEX by EPA 8021B	HOLD	02/04/20	JKR	BZ BZME EBZ XYLENES	
649751-002	S	SS02	01/21/20 10:00	SW9045D	PH By SW9045D	01/23/20	02/18/20	JKR		
649751-002	S	SS02	01/21/20 10:00	SW8015MOD_NM	TPH by SW8015 Mod	HOLD	02/04/20	JKR	GRO-DRO PHCC10C28 PI	
649751-003	S	SS03	01/21/20 10:05	SW9045D	PH By SW9045D	01/23/20	02/18/20	JKR		
649751-003	S	SS03	01/21/20 10:05	SW8015MOD_NM	TPH by SW8015 Mod	HOLD	02/04/20	JKR	GRO-DRO PHCC10C28 PI	
649751-003	S	SS03	01/21/20 10:05	E300_CL	Chloride by EPA 300	HOLD	02/18/20	JKR	CL	
649751-003	S	SS03	01/21/20 10:05	SW8021B	BTEX by EPA 8021B	HOLD	02/04/20	JKR	BZ BZME EBZ XYLENES	

Inter Office Shipment or Sample Comments:

Relinquished By: 
 Elizabeth McClellan

Date Relinquished: 01/21/2020

Received By: 
 Brianna Teel

Date Received: 01/22/2020 11:15

Cooler Temperature: 0.5



Inter-Office Shipment

IOS Number 56499

Date/Time: 01/21/20 14:34

Created by: Elizabeth McClellan

Please send report to: Jessica Kramer

Lab# From: **Carlsbad**

Delivery Priority:

Address: 1089 N Canal Street

Lab# To: **Midland**

Air Bill No.:

F-Mail: jessica.kramer@xenco.com

Sample Id	Matrix	Client Sample Id	Sample Collection	Method	Method Name	Lab Due	HT Due	PM	Analytes	Sign
649751-001	S	SS01	01/21/20 09:55	SW8021B	BTEX by EPA 8021B	HOLD	02/04/20	JKR	BZ BZME EBZ XYLENES	
649751-001	S	SS01	01/21/20 09:55	SW8015MOD_NM	TPH by SW8015 Mod	HOLD	02/04/20	JKR	GRO-DRO PHCC10C28 PF	
649751-001	S	SS01	01/21/20 09:55	E300_CL	Chloride by EPA 300	HOLD	02/18/20	JKR	CL	
649751-002	S	SS02	01/21/20 10:00	SW8015MOD_NM	TPH by SW8015 Mod	HOLD	02/04/20	JKR	GRO-DRO PHCC10C28 PF	
649751-002	S	SS02	01/21/20 10:00	SW8021B	BTEX by EPA 8021B	HOLD	02/04/20	JKR	BZ BZME EBZ XYLENES	
649751-002	S	SS02	01/21/20 10:00	E300_CL	Chloride by EPA 300	HOLD	02/18/20	JKR	CL	
649751-003	S	SS03	01/21/20 10:05	SW8015MOD_NM	TPH by SW8015 Mod	HOLD	02/04/20	JKR	GRO-DRO PHCC10C28 PF	
649751-003	S	SS03	01/21/20 10:05	SW8021B	BTEX by EPA 8021B	HOLD	02/04/20	JKR	BZ BZME EBZ XYLENES	
649751-003	S	SS03	01/21/20 10:05	E300_CL	Chloride by EPA 300	HOLD	02/18/20	JKR	CL	

Inter Office Shipment or Sample Comments:

Relinquished By: 
 Elizabeth McClellan

Date Relinquished: 01/21/2020

Received By: 
 Brianna Teel

Date Received: 01/22/2020 11:15

Cooler Temperature: 0.5



XENCO Laboratories

Inter Office Report- Sample Receipt Checklist

Sent To: Midland

IOS #: 56498

Acceptable Temperature Range: 0 - 6 degC

Air and Metal samples Acceptable Range: Ambient

Temperature Measuring device used : R8

Sent By: Elizabeth McClellan

Date Sent: 01/21/2020 02:34 PM

Received By: Brianna Teel

Date Received: 01/22/2020 11:15 AM

Sample Receipt Checklist

Comments

- #1 *Temperature of cooler(s)? .5
- #2 *Shipping container in good condition? Yes
- #3 *Samples received with appropriate temperature? Yes
- #4 *Custody Seals intact on shipping container/ cooler? Yes
- #5 *Custody Seals Signed and dated for Containers/coolers Yes
- #6 *IOS present? Yes
- #7 Any missing/extra samples? No
- #8 IOS agrees with sample label(s)/matrix? Yes
- #9 Sample matrix/ properties agree with IOS? Yes
- #10 Samples in proper container/ bottle? Yes
- #11 Samples properly preserved? Yes
- #12 Sample container(s) intact? Yes
- #13 Sufficient sample amount for indicated test(s)? Yes
- #14 All samples received within hold time? Yes

* Must be completed for after-hours delivery of samples prior to placing in the refrigerator

NonConformance:

Corrective Action Taken:

Nonconformance Documentation

Contact: _____ Contacted by : _____ Date: _____

Checklist reviewed by:

Brianna Teel

Date: 01/22/2020



XENCO Laboratories

Inter Office Report- Sample Receipt Checklist

Sent To: Midland

IOS #: 56499

Acceptable Temperature Range: 0 - 6 degC

Air and Metal samples Acceptable Range: Ambient

Temperature Measuring device used : R8

Sent By: Elizabeth McClellan

Date Sent: 01/21/2020 02:34 PM

Received By: Brianna Teel

Date Received: 01/22/2020 11:15 AM

Sample Receipt Checklist

Comments

- #1 *Temperature of cooler(s)? .5
- #2 *Shipping container in good condition? Yes
- #3 *Samples received with appropriate temperature? Yes
- #4 *Custody Seals intact on shipping container/ cooler? Yes
- #5 *Custody Seals Signed and dated for Containers/coolers Yes
- #6 *IOS present? Yes
- #7 Any missing/extra samples? No
- #8 IOS agrees with sample label(s)/matrix? Yes
- #9 Sample matrix/ properties agree with IOS? Yes
- #10 Samples in proper container/ bottle? Yes
- #11 Samples properly preserved? Yes
- #12 Sample container(s) intact? Yes
- #13 Sufficient sample amount for indicated test(s)? Yes
- #14 All samples received within hold time? Yes

* Must be completed for after-hours delivery of samples prior to placing in the refrigerator

NonConformance:

Corrective Action Taken:

Nonconformance Documentation

Contact: _____ Contacted by : _____ Date: _____

Checklist reviewed by:

Brianna Teel

Date: 01/22/2020

XENCO Laboratories

Prelogin/Nonconformance Report- Sample Log-In

Client: LT Environmental, Inc.

Date/ Time Received: 01.21.2020 11.39.00 AM

Work Order #: 649751

Acceptable Temperature Range: 0 - 6 degC
Air and Metal samples Acceptable Range: Ambient
Temperature Measuring device used : T-NM-007

Sample Receipt Checklist		Comments
#1 *Temperature of cooler(s)?	5.2	
#2 *Shipping container in good condition?	Yes	
#3 *Samples received on ice?	Yes	
#4 *Custody Seals intact on shipping container/ cooler?	Yes	
#5 Custody Seals intact on sample bottles?	Yes	
#6*Custody Seals Signed and dated?	Yes	
#7 *Chain of Custody present?	Yes	
#8 Any missing/extra samples?	No	
#9 Chain of Custody signed when relinquished/ received?	Yes	
#10 Chain of Custody agrees with sample labels/matrix?	Yes	
#11 Container label(s) legible and intact?	Yes	
#12 Samples in proper container/ bottle?	Yes	
#13 Samples properly preserved?	Yes	
#14 Sample container(s) intact?	Yes	
#15 Sufficient sample amount for indicated test(s)?	Yes	
#16 All samples received within hold time?	Yes	
#17 Subcontract of sample(s)?	Yes	Subbed to Midland.
#18 Water VOC samples have zero headspace?	N/A	

* Must be completed for after-hours delivery of samples prior to placing in the refrigerator

Analyst:

PH Device/Lot#:

Checklist completed by:


Elizabeth McClellan

Date: 01.21.2020

Checklist reviewed by:


Jessica Kramer

Date: 01.22.2020

Analytical Report 650385

for
LT Environmental, Inc.

Project Manager: Dan Moir

Buttercup 27-34 Fed

012919138

28-JAN-20

Collected By: Client



**1089 N Canal Street
Carlsbad, NM 88220**

Xenco-Houston (EPA Lab Code: TX00122):
Texas (T104704215-19-30), Arizona (AZ0765), Florida (E871002-24), Louisiana (03054)
Oklahoma (2019-058), North Carolina (681), Arkansas (19-037-0)

Xenco-Dallas (EPA Lab Code: TX01468):
Texas (TX104704295-19-22), Arizona (AZ0809), Arkansas (17-063-0)

Xenco-El Paso (EPA Lab Code: TX00127): Texas (T104704221-19-16)
Xenco-Lubbock (EPA Lab Code: TX00139): Texas (T104704219-19-21)
Xenco-Midland (EPA Lab Code: TX00158): Texas (T104704400-19-19)
Xenco-Carlsbad (LELAP): Louisiana (05092)
Xenco-San Antonio (EPA Lab Code: TNI02385): Texas (T104704534-19-5)
Xenco Phoenix (EPA Lab Code: AZ00901): Arizona (AZ0757)
Xenco-Tampa: Florida (E87429), North Carolina (483)



28-JAN-20

Project Manager: **Dan Moir**
LT Environmental, Inc.
4600 W. 60th Avenue
Arvada, CO 80003

Reference: XENCO Report No(s): **650385**
Buttercup 27-34 Fed
Project Address:

Dan Moir:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number(s) 650385. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. The uncertainty of measurement associated with the results of analysis reported is available upon request. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 650385 will be filed for 45 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

A handwritten signature in black ink that reads 'Jessica Kramer'.

Jessica Kramer
Project Assistant

Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.

Certified and approved by numerous States and Agencies.

A Small Business and Minority Status Company that delivers SERVICE and QUALITY

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Sample Cross Reference 650385

LT Environmental, Inc., Arvada, CO

Buttercup 27-34 Fed

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
BH01	S	01-27-20 12:10	2.0 ft	650385-001
BH02	S	01-27-20 12:30	2.0 ft	650385-002
BH03	S	01-27-20 12:50	2.0 ft	650385-003



CASE NARRATIVE

Client Name: LT Environmental, Inc.

Project Name: Buttercup 27-34 Fed

Project ID: 012919138
Work Order Number(s): 650385

Report Date: 28-JAN-20
Date Received: 01/27/2020

Sample receipt non conformances and comments:

Sample receipt non conformances and comments per sample:

None



Certificate of Analysis Summary 650385

LT Environmental, Inc., Arvada, CO

Project Name: Buttercup 27-34 Fed

Project Id: 012919138

Contact: Dan Moir

Project Location:

Date Received in Lab: Mon Jan-27-20 02:40 pm

Report Date: 28-JAN-20

Project Manager: Jessica Kramer

Analysis Requested	Lab Id:	650385-001	650385-002	650385-003			
	Field Id:	BH01	BH02	BH03			
	Depth:	2.0- ft	2.0- ft	2.0- ft			
	Matrix:	SOIL	SOIL	SOIL			
	Sampled:	Jan-27-20 12:10	Jan-27-20 12:30	Jan-27-20 12:50			
PH By SW9045D SUB: T104704215-19-30	Extracted:						
	Analyzed:	Jan-28-20 13:25	Jan-28-20 13:25	Jan-28-20 13:25			
	Units/RL:	Deg C RL	Deg C RL	Deg C RL			
Soil pH meas. in water at		24.4	24.3	24.7			
PH By SW9045D SUB: T104704215-19-30	Extracted:						
	Analyzed:	Jan-28-20 13:25	Jan-28-20 13:25	Jan-28-20 13:25			
	Units/RL:	SU RL	SU RL	SU RL			
pH in Water		8.56	8.26	8.02			

This analytical report, and the entire data package it represents, has been made for your exclusive and confidential use. The interpretations and results expressed throughout this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories assumes no responsibility and makes no warranty to the end use of the data hereby presented. Our liability is limited to the amount invoiced for this work order unless otherwise agreed to in writing.

Houston - Dallas - Midland - Tampa - Phoenix - Lubbock - San Antonio - El Paso - Atlanta - New Mexico

Version: 1.0%

Jessica Kramer
Project Assistant



Certificate of Analytical Results 650385

LT Environmental, Inc., Arvada, CO

Buttercup 27-34 Fed

Sample Id: **BH01**
 Lab Sample Id: 650385-001

Matrix: Soil
 Date Collected: 01.27.20 12.10

Date Received: 01.27.20 14.40
 Sample Depth: 2.0 ft

Analytical Method: PH By SW9045D

Tech: KBU
 Analyst: KBU
 Seq Number: 3114680

% Moisture:
 Basis: Wet Weight
 SUB: T104704215-19-30

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
pH in Water	12408-02-5	8.56		SU	01.28.20 13.25		1
Soil pH meas. in water at	TEMP	24.4		Deg C	01.28.20 13.25		1



Certificate of Analytical Results 650385

LT Environmental, Inc., Arvada, CO

Buttercup 27-34 Fed

Sample Id: **BH02**
 Lab Sample Id: 650385-002

Matrix: Soil
 Date Collected: 01.27.20 12.30

Date Received: 01.27.20 14.40
 Sample Depth: 2.0 ft

Analytical Method: PH By SW9045D

Tech: KBU
 Analyst: KBU
 Seq Number: 3114680

% Moisture:
 Basis: Wet Weight
 SUB: T104704215-19-30

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
pH in Water	12408-02-5	8.26		SU	01.28.20 13.25		1
Soil pH meas. in water at	TEMP	24.3		Deg C	01.28.20 13.25		1



Certificate of Analytical Results 650385

LT Environmental, Inc., Arvada, CO

Buttercup 27-34 Fed

Sample Id: **BH03**
 Lab Sample Id: 650385-003

Matrix: Soil
 Date Collected: 01.27.20 12.50

Date Received: 01.27.20 14.40
 Sample Depth: 2.0 ft

Analytical Method: PH By SW9045D

Tech: KBU
 Analyst: KBU
 Seq Number: 3114680

% Moisture:
 Basis: Wet Weight
 SUB: T104704215-19-30

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
pH in Water	12408-02-5	8.02		SU	01.28.20 13.25		1
Soil pH meas. in water at	TEMP	24.7		Deg C	01.28.20 13.25		1



LT Environmental, Inc.

Buttercup 27-34 Fed

Analytical Method: PH By SW9045D

Seq Number: 3114680

Parent Sample Id: 649826-002

Matrix: Soil

MD Sample Id: 649826-002 D

Parameter	Parent Result	MD Result	%RPD	RPD Limit	Units	Analysis Date	Flag
pH in Water	7.40	7.41	0	20	SU	01.28.20 13:25	
Soil pH meas. in water at	23.7	23.9	1	25	Deg C	01.28.20 13:25	

Analytical Method: PH By SW9045D

Seq Number: 3114680

Parent Sample Id: 650379-001

Matrix: Soil

MD Sample Id: 650379-001 D

Parameter	Parent Result	MD Result	%RPD	RPD Limit	Units	Analysis Date	Flag
pH in Water	8.81	8.82	0	20	SU	01.28.20 13:25	
Soil pH meas. in water at	21.4	21.6	1	25	Deg C	01.28.20 13:25	

MS/MSD Percent Recovery
 Relative Percent Difference
 LCS/LCSD Recovery
 Log Difference

$[D] = 100 * (C - A) / B$
 $RPD = 200 * |(C - E) / (C + E)|$
 $[D] = 100 * (C) / [B]$
 Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

LCS = Laboratory Control Sample
 A = Parent Result
 C = MS/LCS Result
 E = MSD/LCSD Result

MS = Matrix Spike
 B = Spike Added
 D = MSD/LCSD % Rec

Inter-Office Shipment

IOS Number : 56897

Date/Time: 01.27.2020

Created by: Elizabeth McClellan

Please send report to: Jessica Kramer

Lab# From: **Carlsbad**

Delivery Priority:

Address: 1089 N Canal Street

Lab# To: **Houston**

Air Bill No.: 777616427779

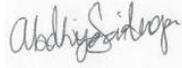
E-Mail: jessica.kramer@xenco.com

Sample Id	Matrix	Client Sample Id	Sample Collection	Method	Method Name	Lab Due	HT Due	PM	Analytes	Sign
650385-001	S	BH01	01.27.2020 12:10	SW9045D	PH By SW9045D	01.28.2020	02.24.2020	JKR		
650385-002	S	BH02	01.27.2020 12:30	SW9045D	PH By SW9045D	01.28.2020	02.24.2020	JKR		
650385-003	S	BH03	01.27.2020 12:50	SW9045D	PH By SW9045D	01.28.2020	02.24.2020	JKR		

Inter Office Shipment or Sample Comments:

Relinquished By: 
 Elizabeth McClellan

Date Relinquished: 01.27.2020

Received By: 
 Abdhija Saidurga

Date Received: 01.28.2020

Cooler Temperature: 3.0



XENCO Laboratories

Inter Office Report- Sample Receipt Checklist

Sent To: Houston

IOS #: 56897

Acceptable Temperature Range: 0 - 6 degC

Air and Metal samples Acceptable Range: Ambient

Temperature Measuring device used : HOU-068

Sent By: Elizabeth McClellan

Date Sent: 01.27.2020 03.46 PM

Received By: Abdhija Saidurga

Date Received: 01.28.2020 09.30 AM

Sample Receipt Checklist

Comments

- #1 *Temperature of cooler(s)? 3
- #2 *Shipping container in good condition? Yes
- #3 *Samples received with appropriate temperature? Yes
- #4 *Custody Seals intact on shipping container/ cooler? N/A
- #5 *Custody Seals Signed and dated for Containers/coolers N/A
- #6 *IOS present? Yes
- #7 Any missing/extra samples? No
- #8 IOS agrees with sample label(s)/matrix? Yes
- #9 Sample matrix/ properties agree with IOS? Yes
- #10 Samples in proper container/ bottle? Yes
- #11 Samples properly preserved? Yes
- #12 Sample container(s) intact? Yes
- #13 Sufficient sample amount for indicated test(s)? Yes
- #14 All samples received within hold time? Yes

* Must be completed for after-hours delivery of samples prior to placing in the refrigerator

NonConformance:

Corrective Action Taken:

Nonconformance Documentation

Contact: _____ Contacted by : _____ Date: _____

Checklist reviewed by:

Abdhija Saidurga

Date: 01.28.2020

XENCO Laboratories

Prelogin/Nonconformance Report- Sample Log-In

Client: LT Environmental, Inc.

Date/ Time Received: 01.27.2020 02.40.00 PM

Work Order #: 650385

Acceptable Temperature Range: 0 - 6 degC
Air and Metal samples Acceptable Range: Ambient
Temperature Measuring device used : T-NM-007

Sample Receipt Checklist		Comments
#1 *Temperature of cooler(s)?	5.2	
#2 *Shipping container in good condition?	Yes	
#3 *Samples received on ice?	Yes	
#4 *Custody Seals intact on shipping container/ cooler?	Yes	
#5 Custody Seals intact on sample bottles?	Yes	
#6*Custody Seals Signed and dated?	Yes	
#7 *Chain of Custody present?	Yes	
#8 Any missing/extra samples?	No	
#9 Chain of Custody signed when relinquished/ received?	Yes	
#10 Chain of Custody agrees with sample labels/matrix?	Yes	
#11 Container label(s) legible and intact?	Yes	
#12 Samples in proper container/ bottle?	Yes	
#13 Samples properly preserved?	Yes	
#14 Sample container(s) intact?	Yes	
#15 Sufficient sample amount for indicated test(s)?	Yes	
#16 All samples received within hold time?	Yes	
#17 Subcontract of sample(s)?	Yes	Subbed to Houston
#18 Water VOC samples have zero headspace?	N/A	

*** Must be completed for after-hours delivery of samples prior to placing in the refrigerator**

Analyst:

PH Device/Lot#:

Checklist completed by:


 Elizabeth McClellan

Date: 01.27.2020

Checklist reviewed by:


 Jessica Kramer

Date: 01.28.2020

Analytical Report 650386

for
LT Environmental, Inc.

Project Manager: Dan Moir

Buttercup 27-34 Fed

012919138

28-JAN-20

Collected By: Client



**1089 N Canal Street
Carlsbad, NM 88220**

Xenco-Houston (EPA Lab Code: TX00122):
Texas (T104704215-19-30), Arizona (AZ0765), Florida (E871002-24), Louisiana (03054)
Oklahoma (2019-058), North Carolina (681), Arkansas (19-037-0)

Xenco-Dallas (EPA Lab Code: TX01468):
Texas (TX104704295-19-22), Arizona (AZ0809), Arkansas (17-063-0)

Xenco-El Paso (EPA Lab Code: TX00127): Texas (T104704221-19-16)
Xenco-Lubbock (EPA Lab Code: TX00139): Texas (T104704219-19-21)
Xenco-Midland (EPA Lab Code: TX00158): Texas (T104704400-19-19)
Xenco-Carlsbad (LELAP): Louisiana (05092)
Xenco-San Antonio (EPA Lab Code: TNI02385): Texas (T104704534-19-5)
Xenco Phoenix (EPA Lab Code: AZ00901): Arizona (AZ0757)
Xenco-Tampa: Florida (E87429), North Carolina (483)



28-JAN-20

Project Manager: **Dan Moir**
LT Environmental, Inc.
4600 W. 60th Avenue
Arvada, CO 80003

Reference: XENCO Report No(s): **650386**
Buttercup 27-34 Fed
Project Address:

Dan Moir:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number(s) 650386. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. The uncertainty of measurement associated with the results of analysis reported is available upon request. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 650386 will be filed for 45 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

A handwritten signature in black ink that reads 'Jessica Kramer'.

Jessica Kramer
Project Assistant

Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.

Certified and approved by numerous States and Agencies.

A Small Business and Minority Status Company that delivers SERVICE and QUALITY

Houston - Dallas - Midland - San Antonio - Phoenix - Oklahoma - Latin America



Sample Cross Reference 650386

LT Environmental, Inc., Arvada, CO

Buttercup 27-34 Fed

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
BG01	S	01-27-20 11:40	0.5 ft	650386-001
BG01A	S	01-27-20 11:50	2 ft	650386-002



CASE NARRATIVE

Client Name: LT Environmental, Inc.

Project Name: Buttercup 27-34 Fed

Project ID: 012919138
Work Order Number(s): 650386

Report Date: 28-JAN-20
Date Received: 01/27/2020

Sample receipt non conformances and comments:

Sample receipt non conformances and comments per sample:

None



Certificate of Analysis Summary 650386

LT Environmental, Inc., Arvada, CO

Project Name: Buttercup 27-34 Fed

Project Id: 012919138

Contact: Dan Moir

Project Location:

Date Received in Lab: Mon Jan-27-20 02:40 pm

Report Date: 28-JAN-20

Project Manager: Jessica Kramer

Analysis Requested	Lab Id:	650386-001	650386-002			
	Field Id:	BG01	BG01A			
	Depth:	0.5- ft	2- ft			
	Matrix:	SOIL	SOIL			
	Sampled:	Jan-27-20 11:40	Jan-27-20 11:50			
PH By SW9045D SUB: T104704215-19-30	Extracted:					
	Analyzed:	Jan-28-20 13:25	Jan-28-20 13:25			
	Units/RL:	Deg C RL	Deg C RL			
Soil pH meas. in water at		24.8	24.8			
PH By SW9045D SUB: T104704215-19-30	Extracted:					
	Analyzed:	Jan-28-20 13:25	Jan-28-20 13:25			
	Units/RL:	SU RL	SU RL			
pH in Water		7.97	8.52			

This analytical report, and the entire data package it represents, has been made for your exclusive and confidential use. The interpretations and results expressed throughout this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories assumes no responsibility and makes no warranty to the end use of the data hereby presented. Our liability is limited to the amount invoiced for this work order unless otherwise agreed to in writing.

Houston - Dallas - Midland - Tampa - Phoenix - Lubbock - San Antonio - El Paso - Atlanta - New Mexico

Jessica Kramer
Project Assistant



Certificate of Analytical Results 650386

LT Environmental, Inc., Arvada, CO

Buttercup 27-34 Fed

Sample Id: **BG01**
 Lab Sample Id: 650386-001

Matrix: Soil
 Date Collected: 01.27.20 11.40

Date Received: 01.27.20 14.40
 Sample Depth: 0.5 ft

Analytical Method: PH By SW9045D

Tech: KBU
 Analyst: KBU
 Seq Number: 3114680

% Moisture:
 Basis: Wet Weight
 SUB: T104704215-19-30

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
pH in Water	12408-02-5	7.97		SU	01.28.20 13.25		1
Soil pH meas. in water at	TEMP	24.8		Deg C	01.28.20 13.25		1



Certificate of Analytical Results 650386

LT Environmental, Inc., Arvada, CO

Buttercup 27-34 Fed

Sample Id: **BG01A**
 Lab Sample Id: 650386-002

Matrix: Soil
 Date Collected: 01.27.20 11.50

Date Received: 01.27.20 14.40
 Sample Depth: 2 ft

Analytical Method: PH By SW9045D

Tech: KBU
 Analyst: KBU
 Seq Number: 3114680

% Moisture:
 Basis: Wet Weight
 SUB: T104704215-19-30

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
pH in Water	12408-02-5	8.52		SU	01.28.20 13.25		1
Soil pH meas. in water at	TEMP	24.8		Deg C	01.28.20 13.25		1



LT Environmental, Inc.

Buttercup 27-34 Fed

Analytical Method: PH By SW9045D

Seq Number: 3114680

Parent Sample Id: 649826-002

Matrix: Soil

MD Sample Id: 649826-002 D

Parameter	Parent Result	MD Result	%RPD	RPD Limit	Units	Analysis Date	Flag
pH in Water	7.40	7.41	0	20	SU	01.28.20 13:25	
Soil pH meas. in water at	23.7	23.9	1	25	Deg C	01.28.20 13:25	

Analytical Method: PH By SW9045D

Seq Number: 3114680

Parent Sample Id: 650379-001

Matrix: Soil

MD Sample Id: 650379-001 D

Parameter	Parent Result	MD Result	%RPD	RPD Limit	Units	Analysis Date	Flag
pH in Water	8.81	8.82	0	20	SU	01.28.20 13:25	
Soil pH meas. in water at	21.4	21.6	1	25	Deg C	01.28.20 13:25	

MS/MSD Percent Recovery
 Relative Percent Difference
 LCS/LCSD Recovery
 Log Difference

$[D] = 100 * (C - A) / B$
 $RPD = 200 * |(C - E) / (C + E)|$
 $[D] = 100 * (C) / [B]$
 Log Diff. = $\text{Log}(\text{Sample Duplicate}) - \text{Log}(\text{Original Sample})$

LCS = Laboratory Control Sample
 A = Parent Result
 C = MS/LCS Result
 E = MSD/LCSD Result

MS = Matrix Spike
 B = Spike Added
 D = MSD/LCSD % Rec

Inter-Office Shipment

IOS Number : 56898

Date/Time: 01.27.2020

Created by: Elizabeth McClellan

Please send report to: Jessica Kramer

Lab# From: **Carlsbad**

Delivery Priority:

Address: 1089 N Canal Street

Lab# To: **Houston**

Air Bill No.: 777616427779

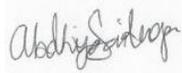
E-Mail: jessica.kramer@xenco.com

Sample Id	Matrix	Client Sample Id	Sample Collection	Method	Method Name	Lab Due	HT Due	PM	Analytes	Sign
650386-001	S	BG01	01.27.2020 11:40	SW9045D	PH By SW9045D	01.28.2020	02.24.2020	JKR		
650386-002	S	BG01A	01.27.2020 11:50	SW9045D	PH By SW9045D	01.28.2020	02.24.2020	JKR		

Inter Office Shipment or Sample Comments:

Relinquished By: 
 Elizabeth McClellan

Date Relinquished: 01.27.2020

Received By: 
 Abdhija Saidurga

Date Received: 01.28.2020

Cooler Temperature: 3.0



XENCO Laboratories

Inter Office Report- Sample Receipt Checklist

Sent To: Houston

IOS #: 56898

Acceptable Temperature Range: 0 - 6 degC

Air and Metal samples Acceptable Range: Ambient

Temperature Measuring device used : HOU-068

Sent By: Elizabeth McClellan

Date Sent: 01.27.2020 03.50 PM

Received By: Abdhija Saidurga

Date Received: 01.28.2020 09.30 AM

Sample Receipt Checklist

Comments

- #1 *Temperature of cooler(s)? 3
- #2 *Shipping container in good condition? Yes
- #3 *Samples received with appropriate temperature? Yes
- #4 *Custody Seals intact on shipping container/ cooler? N/A
- #5 *Custody Seals Signed and dated for Containers/coolers N/A
- #6 *IOS present? Yes
- #7 Any missing/extra samples? No
- #8 IOS agrees with sample label(s)/matrix? Yes
- #9 Sample matrix/ properties agree with IOS? Yes
- #10 Samples in proper container/ bottle? Yes
- #11 Samples properly preserved? Yes
- #12 Sample container(s) intact? Yes
- #13 Sufficient sample amount for indicated test(s)? Yes
- #14 All samples received within hold time? Yes

* Must be completed for after-hours delivery of samples prior to placing in the refrigerator

NonConformance:

Corrective Action Taken:

Nonconformance Documentation

Contact: _____ Contacted by : _____ Date: _____

Checklist reviewed by:

Abdhija Saidurga

Date: 01.28.2020

XENCO Laboratories

Prelogin/Nonconformance Report- Sample Log-In

Client: LT Environmental, Inc.

Date/ Time Received: 01.27.2020 02.40.00 PM

Work Order #: 650386

Acceptable Temperature Range: 0 - 6 degC
Air and Metal samples Acceptable Range: Ambient
Temperature Measuring device used : T-NM-007

Sample Receipt Checklist		Comments
#1 *Temperature of cooler(s)?	5.2	
#2 *Shipping container in good condition?	Yes	
#3 *Samples received on ice?	Yes	
#4 *Custody Seals intact on shipping container/ cooler?	Yes	
#5 Custody Seals intact on sample bottles?	Yes	
#6*Custody Seals Signed and dated?	Yes	
#7 *Chain of Custody present?	Yes	
#8 Any missing/extra samples?	No	
#9 Chain of Custody signed when relinquished/ received?	Yes	
#10 Chain of Custody agrees with sample labels/matrix?	Yes	
#11 Container label(s) legible and intact?	Yes	
#12 Samples in proper container/ bottle?	Yes	
#13 Samples properly preserved?	Yes	
#14 Sample container(s) intact?	Yes	
#15 Sufficient sample amount for indicated test(s)?	Yes	
#16 All samples received within hold time?	Yes	
#17 Subcontract of sample(s)?	Yes	Subbed to Houston
#18 Water VOC samples have zero headspace?	N/A	

*** Must be completed for after-hours delivery of samples prior to placing in the refrigerator**

Analyst:

PH Device/Lot#:

Checklist completed by:


 Elizabeth McClellan

Date: 01.27.2020

Checklist reviewed by:


 Jessica Kramer

Date: 01.28.2020