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IRP-87
10.24.03

CLOSURE REPORT

TEXAS - NEW MEXICO PIPE LINE COMPANY
MONUMENT SITES 3, 3A, 3B, AND 3C
LEA COUNTY, NEW MEXICO

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CLOSURE REPORT

TEXAS - NEW MEXICO PIPE LINE COMPANY
MONUMENT SITES 3, 3A, 3B, AND 3C
LEA COUNTY, NEW MEXICO

PREPARED FOR:

TEXAS - NEW MEXICO PIPE LINE COMPANY
P. O. Box 1030
Jal, New Mexico 88252

Mr. Tony Savoie

PREPARED BY:

KEI

Theresa Nix
Project Manager

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Senior Geologist

KEI Job No. 610057

February 24, 1998

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EXECUTIVE SUMMARY

The Texas - New Mexico Pipe Line Company (TNMPL) alleged release sites 3, 3A, 3B, and 3C are located approximately 2.5 miles west of Monument in Lea County, New Mexico. The sites are specifically located in Section 36, Township 19 South, Range 36 East. A site location map is presented as FIG. 1. The site is owned by Mr. Jimmy Cooper. The layout of all four sites is presented on FIG. 2 and specific site details are presented on FIG. 3 through FIG. 6. This report summarizes closure activities performed at the project site from February through April of 1997.

Pipeline release 00 4/23/97 2/24/98

Field activities performed included the following:

- collection of soil samples from the initial excavation to determine hydrocarbon concentration levels;
- excavation and stockpiling of additional soils which exceeded closure levels;
- collection of confirmation samples in the excavated area;
- characterization of stockpiled soils;
- transportation and off-site landfarming of stockpiled soils; and
- backfilling the excavation with clean soils.

The following conclusions are based on the field and laboratory data presented in this report:

- The closure standards at the site were determined to be as follows:

CONSTITUENT	CLOSURE CONCENTRATIONS (mg/kg)
BENZENE	10
BTEX	50
TPH	100 + Background Concentration

8565

- Approximately 164 cubic yards of impacted soil was excavated, stockpiled, and landfarmed off-site from Monument Site 3.
- Approximately 490 cubic yards of impacted soil was excavated, stockpiled, and landfarmed off-site from Monument Site 3A.
- Approximately 906 cubic yards of impacted soil was excavated, stockpiled, and landfarmed off-site from Monument Site 3B.
- Approximately 1,295 cubic yards of impacted soil was excavated, stockpiled, and landfarmed off-site from Monument Site 3C.
- Confirmation soil samples at the sites indicated TPH, benzene, and BTEX concentrations were below closure standards.

Based on the general attainment of closure levels and the absence of significant vertical migration of hydrocarbon at each site as demonstrated by soil boring results, we recommend all four sites be closed under the New Mexico Oil Conservation Division (OCD) regulations.

PURPOSE AND SCOPE

The objective of the site closure activities was to obtain closure for the site based on OCD regulations. The following activities were performed to achieve this objective:

- determination of closure standards;
- removal of impacted soil;
- characterization of removed impacted soil;
- confirmation sampling in the excavated areas;
- transportation and off-site landfarming of impacted soil; and
- backfilling with clean soil in the excavated areas.

BACKGROUND INFORMATION

Apparent hydrocarbon impact to soils was identified at the subject site. The following response activities were subsequently performed.

- clean overburden soils including topsoil were removed and stockpiled on-site;
- impacted soils were excavated, stockpiled, and some soils were landfarmed off-site;
- one exploratory soil boring was advanced at Monument Site 3;
- one exploratory soil boring was advanced at Monument Site 3A;
- one exploratory soil boring was advanced at Monument Site 3B;
- two exploratory soil borings were advanced at Monument Site 3C; and
- soil samples were collected from native soils during soil boring advancement.

CLOSURE ACTIVITIES

CLOSURE STANDARDS

The New Mexico OCD Guidelines for Remediation of Leaks, Spills, and Releases contains the standard criteria for remediation activities. A ranking analysis for the site was performed to determine appropriate soil remediation levels. The ranking analysis is as follows:

CRITERIA	APPLICABLE STANDARD	POINTS
Depth to Ground Water	Less Than 50 Feet	20 Points
Well Head Protection	Greater Than 1000 Feet to Water Source Greater Than 200 Feet to Private Water Source	0 Points
Surface Water Body	Greater Than 1000 Feet	0 Points
	Total Ranking Score	**20 Points**

Based on the total ranking score, the closure objectives for this site for concentrations of benzene, BTEX, and TPH are summarized below.

CONSTITUENT	CLOSURE CONCENTRATIONS (mg/kg)
BENZENE	10
BTEX	50
TPH	100 + Background Concentration

SOIL REMOVAL

Monument Site 3

Impacted soils were removed from the bottom and sidewalls of the existing excavation on February 28, 1997. These soils included sediments which had washed into the excavation. An estimated 164 cubic yards were removed from the existing excavation and stockpiled on-site for characterization prior to off-site landfarming.

Monument Site 3A

Impacted soils were removed from the bottom and sidewalls of the existing excavation from March 3 through April 7, 1997. These soils included sediments which had washed into the excavation. An estimated 490 cubic yards were removed from the existing excavation and stockpiled on-site for characterization prior to off-site landfarming.

Monument Site 3B

Impacted soils were removed from the bottom and sidewalls of the existing excavation from March 3, 1997 through March 24, 1997. These soils included sediments which had washed into the excavation. An estimated 906 cubic yards were removed from the existing excavation and stockpiled on-site for characterization prior to off-site landfarming.

Monument Site 3C

Impacted soils were removed from the bottom and sidewalls of the existing excavation from March 3, 1997 through March 5, 1997. These soils included sediments which had washed into the excavation. An estimated 1,295 cubic yards were removed from the existing excavation and stockpiled on-site for characterization prior to off-site landfarming.

SOIL CHARACTERIZATION

Monument Site 3

The soil stockpiles were characterized by collecting two composite soil samples for determination of TPH. Laboratory results indicated TPH concentrations of 409 mg/kg and 11,200 mg/kg. Laboratory reports are presented in Appendix A.

Monument Site 3A

The soil stockpiles were characterized by collecting two composite soil samples for determination of TPH. Laboratory results indicated TPH concentrations of 200 mg/kg and 3,640 mg/kg. Laboratory reports are presented in Appendix A.

Monument Site 3B

The soil stockpiles were characterized by collecting two composite soil samples for determination of TPH. Laboratory results indicated TPH concentrations of 2,872 mg/kg and 25,120 mg/kg. Laboratory reports are presented in Appendix A.

Monument Site 3C

The soil stockpiles were characterized by collecting two composite soil samples for determination of TPH. Laboratory results indicated TPH concentrations of 409 mg/kg and 44,830 mg/kg. Laboratory reports are presented in Appendix A.

CONFIRMATION SAMPLING

Monument Site 3

Composite soil samples were collected from the excavation bottom and excavation sidewall and submitted for determination of TPH concentrations. Based on the laboratory results of the sidewall soil sample, additional soils were excavated and the sidewall resampled. The sample locations are presented on FIG. 3.

Laboratory results of the final composite soil samples indicated the following:

SAMPLE LOCATION	MAX. TPH	MAX. BTEX	MAX. BENZENE
Final Soil Sidewall (mg/kg)	20.0	ND	ND
Soil Bottom (mg/kg)	79.0	ND	ND

Previous soil samples collected during the advancement of exploratory soil boring B3-1 were submitted for determination of BTEX and TPH concentrations. All soil samples indicated BTEX concentrations below laboratory detection limits. Regardless, excavation bottom and sidewall confirmation samples were also submitted for determination of BTEX concentrations.

Soil laboratory results are summarized on TABLE I and graphically presented on FIG. 3.

Monument Site 3A

Composite soil samples were collected from the excavation bottom and excavation sidewall and submitted for determination of TPH concentrations. Based on the laboratory results of the sidewall soil sample, additional soils were excavated and the sidewall and excavation bottom resampled. The sample locations are presented on FIG. 4.

Laboratory results of the final composite soil samples indicated the following:

SAMPLE LOCATION	MAX. TPH	MAX. BTEX	MAX. BENZENE
Final Soil Sidewall (mg/kg)	208*	0.135	0.135
Soil Bottom (mg/kg)	48	0.144	0.144

*Background level was 56 mg/kg. Site closure level was 156 mg/kg.

Previous soil samples collected during the advancement of exploratory soil boring B3A-1 were submitted for determination of BTEX and TPH concentrations. One soil sample indicated a detectable BTEX concentration of 0.708. Therefore, excavation bottom and sidewall samples were also submitted for determination of BTEX concentrations.

Soil laboratory results are summarized on TABLE I and graphically presented on FIG. 4.

Monument Site 3B

Composite soil samples were collected from the excavation bottom and excavation sidewall and submitted for determination of TPH concentrations. Based on the laboratory results of the sidewall soil sample, additional soils were excavated and the sidewall resampled. The sample locations are presented on FIG. 5.

Laboratory results of the final composite soil samples indicated the following:

SAMPLE LOCATION	MAX. TPH	MAX. BTEX	MAX. BENZENE
Final Soil Sidewall (mg/kg)	130*	N/A	N/A
Soil Bottom (mg/kg)	20	N/A	N/A

*Background level was 24 mg/kg. Closure level was 124 mg/kg.

Previous soil samples collected during the advancement of exploratory soil boring B3B-1 were submitted for determination of BTEX and TPH concentrations. All soil samples indicated BTEX concentrations below laboratory detection limits. Therefore, excavation bottom and sidewall samples were not submitted for determination of BTEX concentrations.

Soil laboratory results are summarized on TABLE I and graphically presented on FIG. 5.

Monument Site 3C

Composite soil samples were collected from the excavation bottom and excavation sidewall and submitted for determination of TPH concentrations. Based on the laboratory results of the sidewall soil sample, additional soils were excavated and the sidewall resampled. The sample locations are presented on FIG. 6.

Laboratory results of the final composite soil samples indicated the following:

SAMPLE LOCATION	MAX. TPH	MAX. BTEX	MAX. BENZENE
Final Soil Sidewall (mg/kg)	100	ND	ND
Soil Bottom (mg/kg)	75.5	ND	ND

Previous soil samples collected during the advancement of exploratory soil borings B3C-1 and B3C-2 were submitted for determination of BTEX and TPH concentrations. All soil samples indicated BTEX concentrations below laboratory detection limits. Regardless, excavation bottom and sidewall confirmation samples were also submitted for determination of BTEX concentrations.

Soil laboratory results are summarized on TABLE I and graphically presented on FIG. 6.

SOIL DISPOSAL

Authorization to transport and landfarm the impacted soils off-site was obtained from OCD. The impacted soils were transported to C&C Landfarm Incorporated located approximately two miles south of Monument, New Mexico. Disposal documentation is presented in APPENDIX B.

BACKFILL AND RESTORATION

Monument Site 3

Approximately 182 cubic yards of clean fill material was purchased from the landowner and placed in the excavation. The remaining non-impacted stockpiled soils from the initial release excavation activities were used to complete the backfilling operations. The area was graded and reseeded following backfilling.

Monument Site 3A

Approximately 542 cubic yards of clean fill material was purchased from the landowner and placed in the excavation. The remaining non-impacted stockpiled soils from the initial release excavation activities were used to complete the backfilling operations. The area was graded and reseeded following backfilling.

Monument Site 3B

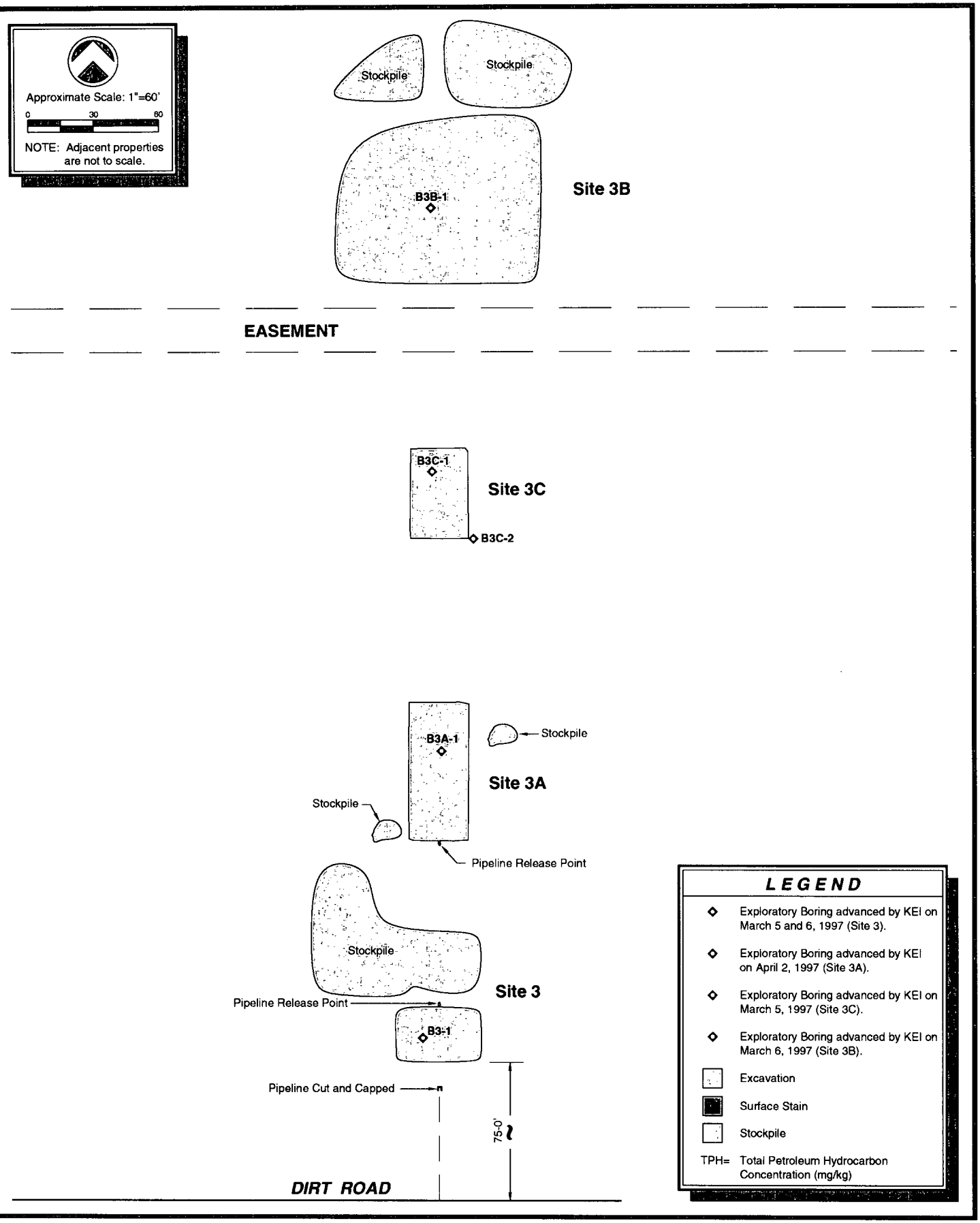
Approximately 1,004 cubic yards of clean fill material was purchased from the landowner and placed in the excavation. The remaining non-impacted stockpiled soils from the initial release excavation activities were used to complete the backfilling operations. The area was graded and reseeded following backfilling.

Monument Site 3C

Approximately 1,434 cubic yards of clean fill material was purchased from the landowner and placed in the excavation. The remaining non-impacted stockpiled soils from the initial release excavation activities were used to complete the backfilling operations. The area was graded and reseeded following backfilling.

QA/QC PROCEDURES

The soil samples collected were placed in a sterile glass container equipped with a Teflon-lined lid furnished by the analytical laboratory. The container was filled to capacity with soil to limit the amount of head-space present. Each container was labeled and placed on ice in an insulated cooler. The cooler was sealed for shipment to Environmental Lab of Texas, Inc. in Odessa, Texas or XENCO Laboratories in San Antonio, Texas for determination of TPH concentrations using EPA Method 418.1. Selected soil samples from Monument Site 3A were submitted for determination of BTEX concentrations using EPA Method SW846-8020, 5030. Proper chain-of-custody documentation was maintained throughout the sampling process.



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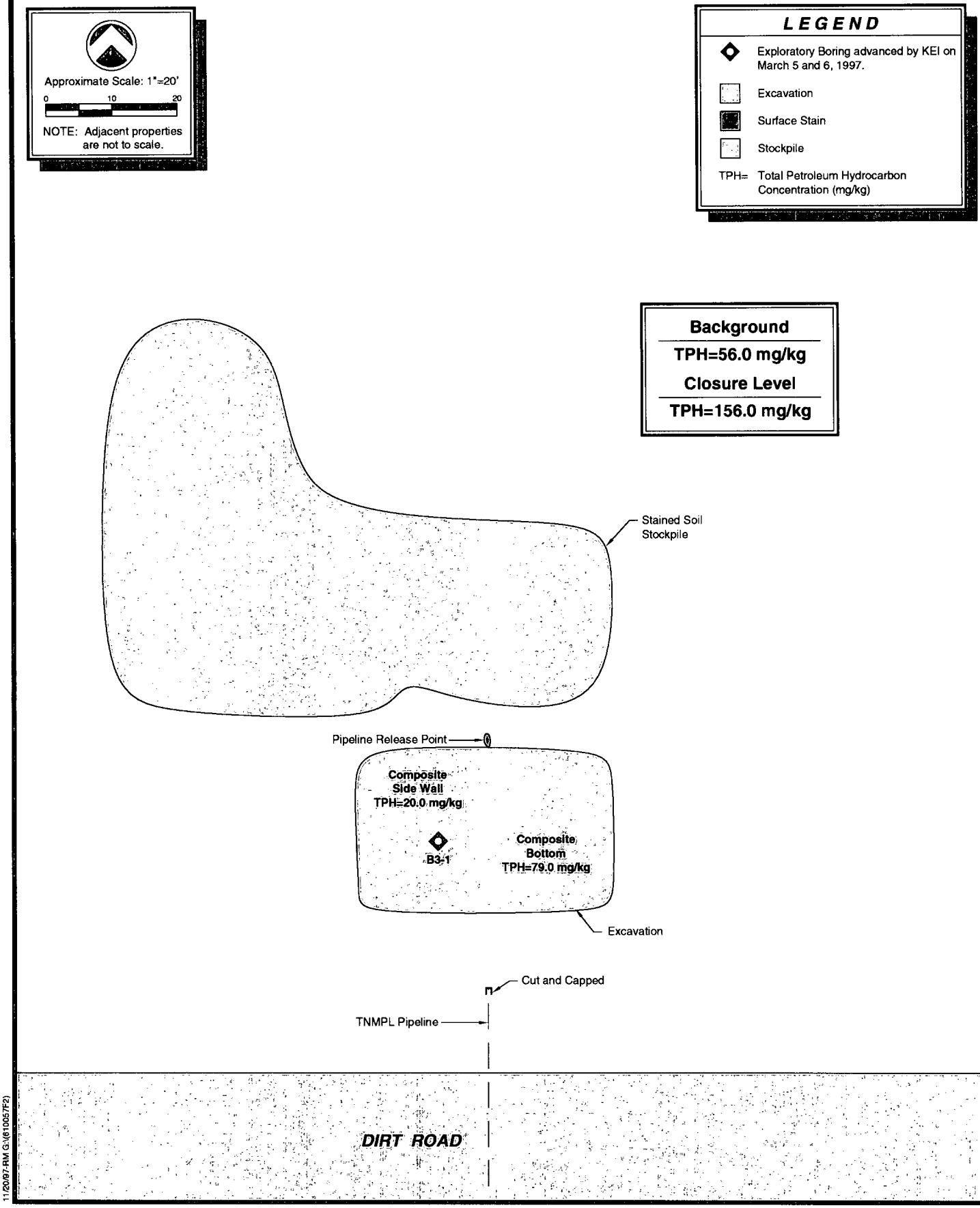
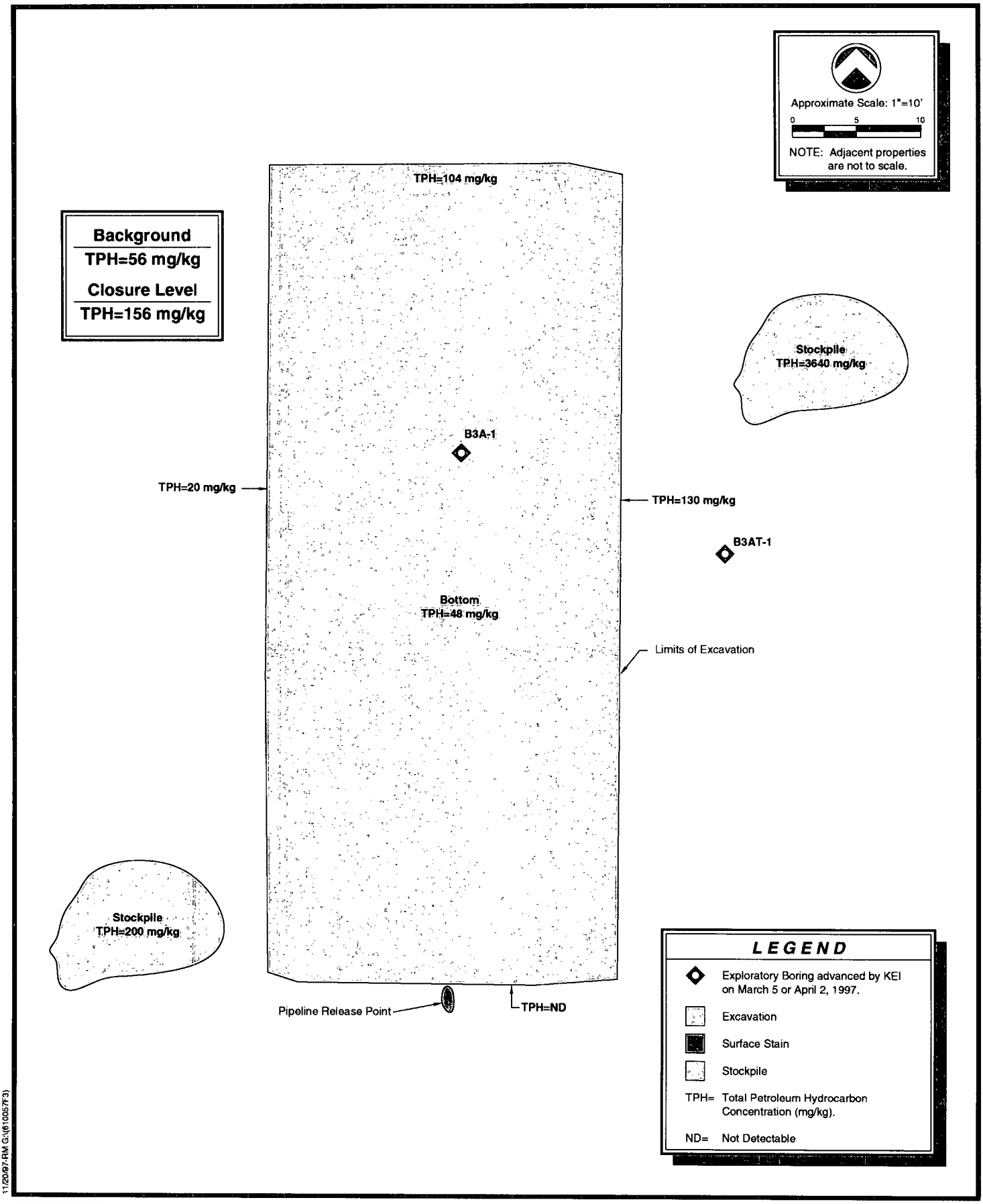
SITE LAYOUT - SITES 3, 3A, 3B AND 3C	610057
TEXAS - NEW MEXICO PIPE LINE CO. LEA COUNTY, NEW MEXICO	FIG 2



11/20/97-RM G:\(610057F2)

k·e·i	SITE DETAILS	610057
	TEXAS - NEW MEXICO PIPE LINE CO. MONUMENT SITE NO. 3 LEA COUNTY, NEW MEXICO	FIG 3



11/20/97-RM G:\(610057F3)

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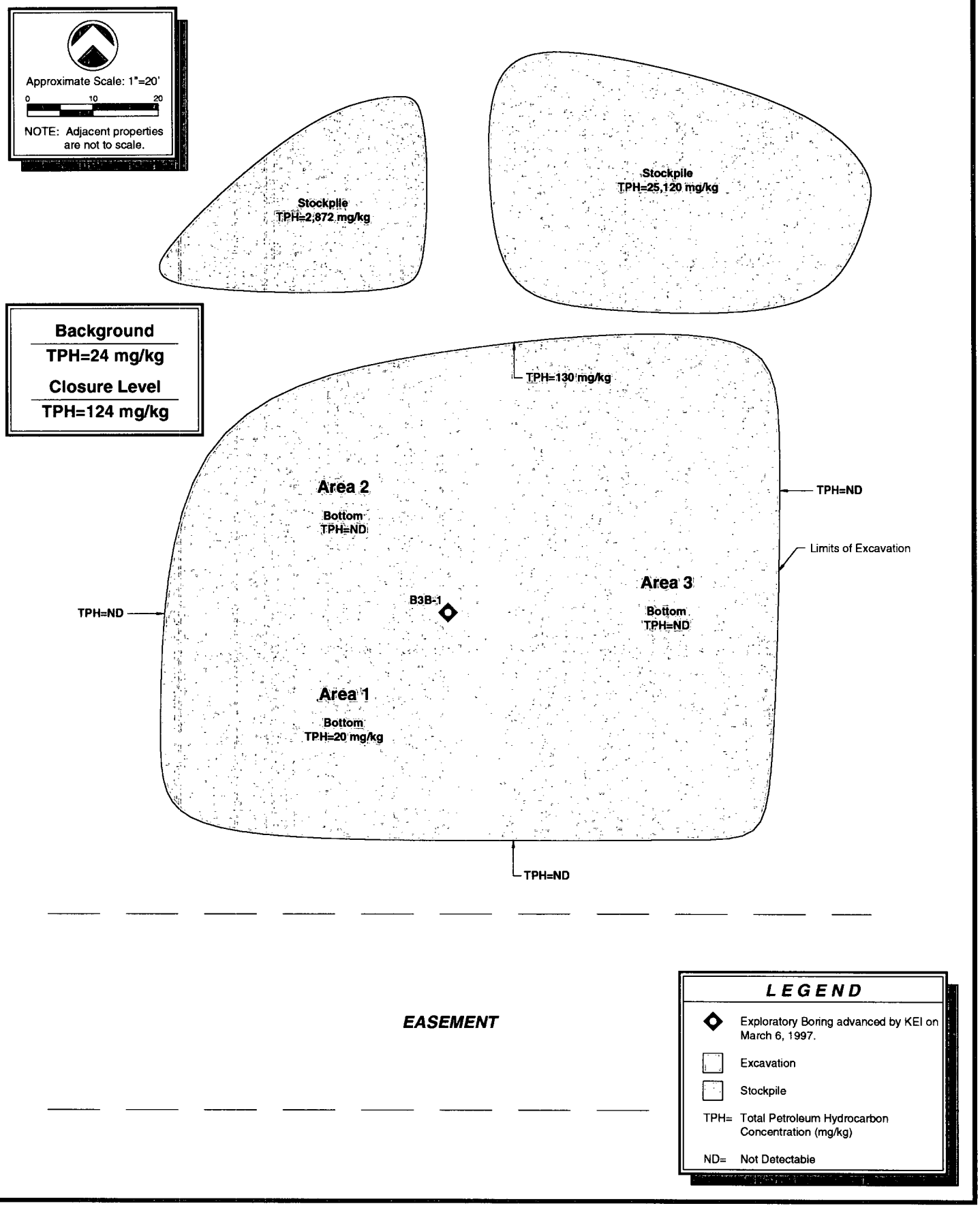
SITE DETAILS			610057
TEXAS - NEW MEXICO PIPE LINE CO.	MONUMENT SITE NO. 3A	LEA COUNTY, NEW MEXICO	FIG 4



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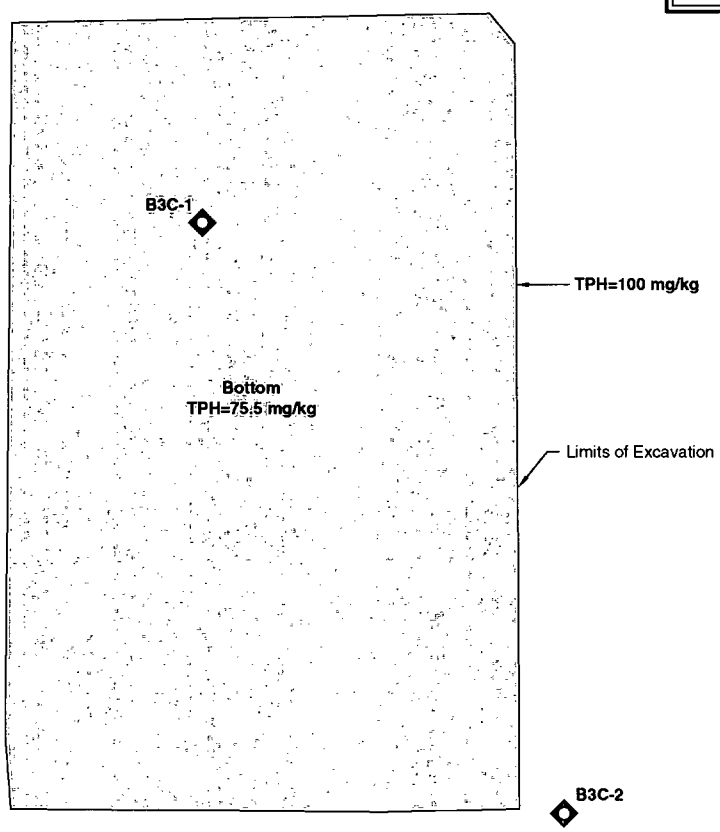
SITE DETAILS			610057
TEXAS - NEW MEXICO PIPE LINE CO.	MONUMENT SITE NO. 3B	LEA COUNTY, NEW MEXICO	FIG 5

Approximate Scale: 1"=10'

0 5 10

NOTE: Adjacent properties are not to scale.

Closure Level
TPH=100.0 mg/kg



LEGEND

- Exploratory Boring advanced by KEI on March 5, 1997.
- Excavation
- TPH= Total Petroleum Hydrocarbon Concentration (mg/kg)

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SITE DETAILS			610057
TEXAS - NEW MEXICO PIPE LINE CO.	MONUMENT SITE NO. 3C	LEA COUNTY, NEW MEXICO	FIG 6

GENERAL NOTES

ND - Indicates constituent was not detected above the method detection limit.
--- - Indicates sample was not analyzed for specified constituent.

Method detection limits:

Soil:	TPH	-	10 mg/kg
	BTEX	-	0.020 to 0.100 mg/kg

Laboratory test methods:	BTEX	-	EPA Method SW846-8020, 5030
	TPH	-	EPA Method 418.1

TABLE I

SUMMARY OF LABORATORY RESULTS - SOIL
MONUMENT SITE 3
LEA COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DATE	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL-BENZENE (mg/kg)	XYLENES (mg/kg)	BTEX (mg/kg)	TPH (mg/kg)
Boring Installation							
B3-1 at 1 - 2 feet	03/05/97	ND	ND	ND	ND	ND	48.0
B3-1 at 13 - 14 feet	03/05/97	ND	ND	ND	ND	ND	38.0
Excavation Sampling							
East Sidewall	02/24/97	ND	0.131	0.127	0.625	0.883	190
West Sidewall	02/24/97	ND	ND	ND	ND	ND	3,280
South Sidewall	02/24/97	ND	ND	ND	0.601	0.601	160
Soil Characterization Sampling							
Stockpile	02/24/97	ND	ND	ND	0.114	0.114	11,200
Stockpile(1)	03/21/97	ND	ND	ND	ND	ND	409
Background Sampling							
Background	04/18/97	---	---	---	---	---	56[2]
Confirmation Sampling							
Excavation Bottom	03/21/97	ND	ND	ND	ND	ND	79.0
Composite Sidewall	03/21/97	ND	ND	ND	ND	ND	20.0[3]

NOTES:

1. Indicates stockpile which included soils from Monument Site 3 and Site 3C.
2. The background concentration for Monument Site 3A was also utilized for Monument Site 3 due to the close proximity.
3. Indicates the retest of excavation side wall sample collected February 24, 1997, following overexcavation of additional soils.

TABLE II

SUMMARY OF LABORATORY RESULTS - SOIL
MONUMENT SITE 3A
LEA COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DATE	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL-BENZENE (mg/kg)	XYLENES (mg/kg)	BTEX (mg/kg)	TPH (mg/kg)
Boring Installation							
B3A-1 at 4 - 5 feet	03/05/97	ND	ND	ND	ND	ND	49.5
B3A-1 at 6 - 7 feet	03/05/97	ND	0.135	0.082	0.489	0.706	2,830
B3A-1 at 10 - 11 feet	03/05/97	ND	ND	ND	ND	ND	31.5
Excavation Sampling							
Excavation Bottom	04/07/97	---	---	---	---	---	200
North Sidewall	04/07/97	---	---	---	---	---	250
South Sidewall	04/07/97	---	---	---	---	---	1,230
West Sidewall	04/07/97	---	---	---	---	---	4,360
East Sidewall	04/07/97	---	---	---	---	---	130
Deep Excavation Bottom	04/07/97	---	---	---	---	---	190
Soil Characterization Sampling							
East Stockpile	04/18/97	---	---	---	---	---	3,640
West Stockpile	04/18/97	---	---	---	---	---	200
Background Sampling							
Background	04/18/97	---	---	---	---	---	56
Confirmation Sampling							
Excavation Bottom	04/18/97	0.144	ND	ND	ND	0.144	48[1]
Excavation North Sidewall	04/18/97	0.114	ND	ND	ND	0.114	104[1]
Excavation South Sidewall	04/18/97	ND	ND	ND	ND	ND	ND[1]
Excavation West Sidewall	04/18/97	0.135	ND	ND	ND	0.135	208[1]

NOTES:

1. Indicates the retest of excavation sample collected April 7, 1997, following overexcavation of additional soils.

TABLE III

SUMMARY OF LABORATORY RESULTS - SOIL
MONUMENT SITE 3B
LEA COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DATE	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL-BENZENE (mg/kg)	XYLENES (mg/kg)	BTEX (mg/kg)	TPH (mg/kg)
Boring Installation							
B3B-1 at 4 - 5 feet	03/06/97	ND	ND	ND	ND	ND	37.0
B3B-1 at 13 - 14 feet	03/06/97	ND	ND	ND	ND	ND	52.0
Excavation Sampling							
Area 1 - Excavation Bottom	04/07/97	---	---	---	---	---	20
Area 2 - Excavation Bottom	04/07/97	---	---	---	---	---	ND
Area 2 - North Sidewall	04/07/97	---	---	---	---	---	40
Area 2 - West Sidewall	04/07/97	---	---	---	---	---	160
Area 3 - Excavation Bottom	04/07/97	---	---	---	---	---	ND
Area 3 - North Sidewall	04/07/97	---	---	---	---	---	130
Area 3 - South Sidewall	04/07/97	---	---	---	---	---	550
Area 3 - West Sidewall	04/07/97	---	---	---	---	---	40
Area 3 - East Sidewall	04/07/97	---	---	---	---	---	140
Soil Characterization Sampling							
North Stockpile	04/18/97	---	---	---	---	---	2,872
South Stockpile	04/18/97	---	---	---	---	---	25,120
Background Sampling							
Background	04/18/97	---	---	---	---	---	24
Confirmation Sampling							
Area 2 - West Sidewall	04/30/97	---	---	---	---	---	ND[1]
Area 3 - North Sidewall	04/30/97	---	---	---	---	---	130[1]
Area 3 - South Sidewall	04/30/97	---	---	---	---	---	ND[1]
Area 3 - East Sidewall	04/30/97	---	---	---	---	---	ND[1]

NOTES:

1. Indicates the retest of excavation sidewall sample collected April 7, 1997, following overexcavation of additional soils.

TABLE IV

SUMMARY OF LABORATORY RESULTS - SOIL
MONUMENT SITE 3C
LEA COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DATE	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL-BENZENE (mg/kg)	XYLENES (mg/kg)	BTEX (mg/kg)	TPH (mg/kg)
Boring Installation							
B3C-1 at 1 - 2 feet	03/05/97	ND	ND	ND	ND	ND	36.0
B3C-1 at 13 - 14 feet	03/05/97	ND	ND	ND	ND	ND	56.0
B3C-2 at 5 - 6 feet	03/05/97	ND	ND	ND	ND	ND	30.5
B3C-2 at 13 - 14 feet	03/05/97	ND	ND	ND	ND	ND	26.5
Excavation Sampling							
East Sidewall	02/24/97	ND	0.144	0.681	1.817	2.642	23,670
West Sidewall	02/24/97	ND	ND	0.920	2.150	3.070	43,330
Excavation Bottom	03/21/97	ND	ND	ND	ND	ND	75.5
Composite Sidewall	03/21/97	ND	ND	ND	ND	ND	283
Soil Characterization Sampling							
Stockpile	02/24/97	ND	0.606	0.338	2.759	3.703	44,830
Stockpile(1)	03/21/97	ND	ND	ND	ND	ND	409
Confirmation Sampling							
East Sidewall	04/07/97	---	---	---	---	---	100[(2)]

NOTES:

1. Indicates stockpile which included soils from Monument Site 3 and Site 3C.
2. Indicates the retest of excavation side wall sample collected March 21, 1997, following overexcavation of additional soils.

ENVIRONMENTAL
LAB OF TEXAS, INC.
"Don't Treat Your Soil Like Dirt!"

KEI
ATTN: MR. PAUL HARTNETT
5309 WURZBACH SUITE 100
SAN ANTONIO, TEXAS 78238
FAX: 9210-680-3763

Receiving Date: 02/25/97
Sample Type: SOIL
Project : 610057 .02.03
Project Location: MONUMENT, NM

Analysis Date: TPH 02/26/97
Analysis Date: BTEX: 02/25/97
Sampling Date: 02/24/97
Sample Condition: Intact/Iced

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg	TPH mg/kg
10281	STOCKPILE	<0.100	<0.100	<0.100	0.114	<0.100	11,200
10282	WEST SIDE	<0.100	<0.100	<0.100	<0.100	<0.100	3,280
10283	EAST SIDE	<0.100	0.131	0.127	0.395	0.23	190
10284	SOUTH SIDE	<0.100	<0.100	<0.100	0.372	0.229	160
	% IA	85	83	84	96	85	99
	% EA	100	94	89	100	91	102
	BLANK	<0.001	<0.001	<0.001	<0.001	<0.001	<1

METHODS: SW 846-8020,5030 , EPA 418.1

Michael R. Fowler

Michael R. Fowler

3-17-97
Date

Environmental Lab of Texas, Inc.

12600 West I-20 East Odessa, Texas 79763
(915) 563-1800 FAX (915) 563-1713

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: TONY SAVOIE
Phone #:
FAX #: 1-505-395-3336
Company Name & Address: KEI / TNMPL
Project #: 610057
Project Name: 610057.02.03
Project Location: monument
Sampler Signature: Gerald L. Carrillo

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	MATRIX: SOIL	MATRIX: AIR	MATRIX: SLUDGE	MATRIX: OTHER	PRESERVATIVE METHOD: HCL	PRESERVATIVE METHOD: HNO3	PRESERVATIVE METHOD: ICE	PRESERVATIVE METHOD: NONE	PRESERVATIVE METHOD: OTHER	SAMPLING: DATE	SAMPLING: TIME	ANALYSIS REQUEST: BTEX 8020/5030	ANALYSIS REQUEST: TPH 418.1	ANALYSIS REQUEST: TCLP Metals Ag As Ba Cd Cr Pb Hg Se	ANALYSIS REQUEST: Total Metals Ag As Ba Cd Cr Pb Hg Se	ANALYSIS REQUEST: TCLP Volatiles	ANALYSIS REQUEST: TCLP Semi Volatiles	ANALYSIS REQUEST: TDS	ANALYSIS REQUEST: RCI
10281	STOCKILE	1	402		X						X			2-24-97	1530	X	X						
10282	WESTSIDE	1			"						"			2-24-97	1530	"	"						
10283	EASTSIDE	1			"						"			2-24-97	1530	"	"						
10284	SOUTH SIDE	1			"						"			2-24-97	1530	"	"						

Relinquished by:	Date:	Time:	Received by:
Gerald Carrillo	2-25-97	0600	
Relinquished by:	Date:	Time:	Received by:
	2-25-97	0800	Ralph K Johnson
Relinquished by:	Date:	Time:	Received by Laboratory:

REMARKS: P.O. 7171

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

KEI
ATTN: MR. PAUL HARTNETT
5309 WURZBACH SUITE 100
SAN ANTONIO, TEXAS 78238
FAX: 9210-680-3763

Receiving Date: 02/25/97
Sample Type: SOIL
Project : 610057 .02.03C
Project Location: MONUMENT, NM

Analysis Date: TPH 02/26/97
Analysis Date: BTEX: 02/25/97
Sampling Date: 02/24/97
Sample Condition: Intact/Iced

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg	TPH mg/kg
10285	STOCKPILE	<0.100	0.606	0.338	1.745	1.014	44,830
10286	EAST SIDE	<0.100	0.144	0.681	1.027	0.790	23,670
10287	WEST SIDE	<0.100	<0.100	0.920	1.271	0.879	43,330
	% IA	85	83	84	96	85	99
	% EA	100	94	89	100	91	102
	BLANK	<0.001	<0.001	<0.001	<0.001	<0.001	<1

METHODS: SW 846-8020,5030 , EPA 418.1

Michael R. Fowler

Michael R. Fowler

3-17-97

Date

P. 03

Environmental Lab of Texas, Inc.

12600 West I-20 East Odessa, Texas 79763
(915) 563-1800 FAX (915) 563-1713

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: TONY SAVOIE
Phone #:
FAX #: 1-505-395-3336

Company Name & Address: KEI / TNMPL

Project #: 610057
Project Name: 610057.02.03C

Project Location: Monument
Sampler Signature: Gerald L Carrillo

ANALYSIS REQUEST

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	OTHER	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	OTHER	SAMPLING: DATE	TIME	BTEX 8020/5030	TPH 418.1	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	TDS	RCI
16285	STOCKPILE	1	4oz		X									2-24-97	1620	X	X						
10286	East Side	1												2-24-97	1620								
10287	West Side	1												2-24-97	1620								

Relinquished by:	Date:	Time:	Received by:
Gerald Carrillo	2-25-97	0600	
Relinquished by:	Date:	Time:	Received by:
	2-25-97	0800	Rebecca Jones
Relinquished by:	Date:	Time:	Received by Laboratory:

REMARKS: P.O. 7171

ANALYTICAL REPORT 1-70560

for

K.E.I. Consultants, Inc.

Project Manager: Ann Baker

Project Name: TNMPL Monument

March 12, 1997

XENCO Laboratories

HOUSTON - DALLAS - SAN ANTONIO

11381 Meadowglen Lane Suite L * Houston, Texas 77082-2647
Phone (713) 589-0692 Fax (713) 589-0695

XENCO Laboratories

11381 Meadowglen Suite L
Houston, Texas 77082-2647
(713) 589-0692 Fax: (713) 589-0695
Houston - Dallas - San Antonio

March 12, 1997

Project Manager: Ann Baker
K.E.I. Consultants, Inc.
5309 Wurzbach Rd., Suite 100
San Antonio, TX 78238

Reference: **XENCO Report No.: 1-70560**
Project Name: TNMPL Monument
Project ID: 610057-2-3,3A,3B,3C
Project Address: Sites 3,3A,3B,3C

Dear Ann Baker:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with XENCO Chain of Custody Number 1-70560. All results being reported to you apply only to the samples analyzed, properly identified with a Laboratory ID number. This letter documents the official transmission of the contents of the report and validates the information contained within.

All the results for the quality control samples passed thorough examination. Also, all parameters for data reduction and validation checked satisfactorily. In view of this, we are able to release the analytical data for this report within acceptance criteria for accuracy, precision, and completeness.

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 3 years in our archives and after that time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in COC No. 1-70560 will be filed for 60 days, and after that time they will be properly disposed of 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).

XENCO Laboratories is accredited by the American Association for Laboratory Accreditation (A2LA) for technical competence in the field of Environmental Testing (Certificate No. 0343-01). In accordance with A2LA's guidelines, XENCO operates a Quality System that meets ISO/IEC Guide 25 requirements and is strictly implemented and enforced through our standard QA/QC procedures.

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.

Sincerely,

Eddie Tonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

11381 Meadowglen Suite L Houston, Texas 77082
(713) 589-0692 Fax (713) 589-0695

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST FORM

Lab. Batch # 170560-SA

Contractor: KEI Consultants — Phone: (210) 680-3767

Address: 5309 Wurzbach, Ste 100, San Antonio TX 78238

Project Name: TNMPL Monument — Project Director: Paul Hartnett

Project Location: Sites 3, 3A, 3B, 3C — Project Manager: Ann Baker

Sampler Signature: Brian Siegfried — Project No.: 610057-2-3, 3A, 3B, 3C

No. coolers this shipment: — Contractor COC # 0005

Carrier: — Quote #:

Airbill No. — P.O. No.: 7172

Turn-around: ASAP; 24 hrs; 48 hrs; (Standard)

	Field ID	Date	Time	DEPTH	SOIL	WATER	COMP	GRAB	Container Size	Container Type P, G	Preservative: Ice	Preservative: Other	Sample Description	No of Containers Total	BTEX (5030/8020-602)	TPH (418.1)	Please Hold	Remarks	LAB ONLY ID #
1	B3-1 1-2	3/5/97	1545	1-2	X				4 oz	G	X		B3-1, 1-2	1	X	X			1
2	B3-1 13-14		1615	13-14					4 oz				B3-1, 13-14	1					2
3	B3A-1 4-5		1510	4-5					4 oz				B3A-1, 4-5	1					3
4	B3A-1 6-7		1510	6-7					4 oz				B3A-1, 6-7	1					4
5	B3A-1 6-7		1510	6-7					8 oz				B3A-1, 6-7	1				Hold	5
6	B3A-1 10-11		1525	10-11					4 oz				B3A-1, 10-11	1	X	X			6
7	B3B-1 4-5	3/6/97	0845	4-5					4 oz				B3B-1 4-5	1					7
8	B3B-1 13-14		0855	13-14					4 oz				B3B-1, #13-14	1					8
9	B3C-1 1-2	3/5/97	1050	1-2					4 oz				B3C-1, 1-2	1					9
10	B3C-1 13-14		1115	13-14					4 oz				B3C-1, 13-14	1					10

Unl Dies Ker Unknown

Waste Oil

PIT No: Tank No:

Relinquished by: (Signature)	DATE	TIME	Received by: (Signature)	DATE	TIME
Brian Siegfried	3/6/97	1600	Ann D Baker	3/7/97	1005
Ann D Baker	3/7/97	1010			
			Received For Laboratory by	3/7/97	1010

Remarks: call with Highest TPH result

Pink (Contractor), Yellow & White (Lab).

* Pre-scheduling is recommended

Precision Analytical Services

XENCO Laboratories

11381 Meadowglen Suite L Houston, Texas 77082
(713) 589-0692 Fax (713) 589-0695

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST FORM

Page 2 of 2

Lab. Batch # 170560-SA

Contractor: KET Consultants | Phone: (210) 680-3767

Address: 5309 Wurzbach, Ste 100, San Antonio TX 78238

Project Name: TNMPL Monument | Project Director: Paul Hartnett

Project Location: Sites 3, 3A, 3B, 3C | Project Manager: Ann Baker

Sampler Signature: Brian Siegfried | Project No.: 610057-2-3, 3A, 3B, 3C

No. coolers this shipment:

Carrier:

Airbill No.

Contractor COC # 0005

Quote #:

P.O. No.: 7172

Turn-around: ASAP / 24 hrs / 48 hrs / Standard

	Field ID	Date	Time	Depth	Soil	Water	Comp	Grab	Container Size	Container Type P, G	Preservative Ice	Preservative Other	Sample Description	No of Containers Total	BTEX (5030/8020-602)	TPH (418.1)	Please Hold	Remarks	LAB ONLY ID #
1	B3C-2 5-6	3/5/97	1410	5-6	X				4oz	G	X		B3C-2, 5-6'	1	X	X			1
2	B3C-2 13-14	3/5/97	1450	13-14	X				4oz	G	X		B3C-2, 13-14	1	X	X			2
3																			3
4																			4
5																			5
6																			6
7																			7
8																			8
9																			9
10																			10

Unl Dies Ker Unknown

Waste Oil

PIT No: Tank No:

Relinquished by: (Signature)	DATE	TIME	Received by: (Signature)	DATE	TIME
Brian Siegfried	3/6/97	1600	Ann D Baker	3/7/97	1005
Ann D Baker	3/7/97	1010			
			Received For Laboratory by		
			Cathy Burns	3/7/97	1010

Remarks: call with highest TPH result

Pink (Contractor), Yellow & White (Lab).

* Pre-scheduling is recommended

Precision Analytical Services

XENCO Laboratories

ANALYTICAL CHAIN OF CUSTODY REPORT
CHRONOLOGY OF SAMPLES

K.E.I. Consultants, Inc.

Project ID: 610057-2-3,3A,3B,3C
Project Manager: Ann Baker
Project Location: Sites 3,3A,3B,3C

Project Name: TNMPL Monument

XENCO COC#: 1-70560
Date Received in Lab: Mar 7, 1997 10:10 by CB
XENCO contact : Carlos Castro/Edward Yonemoto

	Field ID	Lab. ID	Method Name	Method ID	Units	Turn Around	Date and Time: Sample Collected	Date and Time: Addition Requested	Date and Time: Extraction	Date and Time: Analysis
1	B3-1(1-2')	170560-001	BTEX	SW-846	ppm	Standard	Mar 5, 1997 15:45		Mar 10, 1997 by CB	Mar 10, 1997 22:53 by CB
2			TPH	EPA 418.1	ppm	Standard	Mar 5, 1997 15:45		Mar 10, 1997 by HL	Mar 10, 1997 17:23 by HL
3	B3-1(13-14')	170560-002	BTEX	SW-846	ppm	Standard	Mar 5, 1997 16:15		Mar 10, 1997 by CB	Mar 10, 1997 23:10 by CB
4			TPH	EPA 418.1	ppm	Standard	Mar 5, 1997 16:15		Mar 10, 1997 by HL	Mar 10, 1997 17:26 by HL
5	B3A-1(4-5')	170560-003	BTEX	SW-846	ppm	Standard	Mar 5, 1997 15:10		Mar 10, 1997 by CB	Mar 10, 1997 23:28 by CB
6			TPH	EPA 418.1	ppm	Standard	Mar 5, 1997 15:10		Mar 10, 1997 by HL	Mar 10, 1997 17:29 by HL
7	B3A-1(6-7')	170560-004	BTEX	SW-846	ppm	Standard	Mar 5, 1997 15:10		Mar 11, 1997 by CB	Mar 11, 1997 11:57 by CB
8			TPH	EPA 418.1	ppm	Standard	Mar 5, 1997 15:10		Mar 10, 1997 by HL	Mar 10, 1997 17:34 by HL
9	B3A-1(10-11')	170560-006	BTEX	SW-846	ppm	Standard	Mar 5, 1997 15:25		Mar 10, 1997 by CB	Mar 10, 1997 23:45 by CB
10			TPH	EPA 418.1	ppm	Standard	Mar 5, 1997 15:25		Mar 10, 1997 by HL	Mar 10, 1997 17:37 by HL
11	B3B-1(4-5')	170560-007	BTEX	SW-846	ppm	Standard	Mar 6, 1997 08:45		Mar 10, 1997 by CB	Mar 11, 1997 00:03 by CB
12			TPH	EPA 418.1	ppm	Standard	Mar 6, 1997 08:45		Mar 10, 1997 by HL	Mar 10, 1997 17:41 by HL
13	B3B-1(13-14')	170560-008	BTEX	SW-846	ppm	Standard	Mar 6, 1997 08:55		Mar 10, 1997 by CB	Mar 11, 1997 00:20 by CB
14			TPH	EPA 418.1	ppm	Standard	Mar 6, 1997 08:55		Mar 10, 1997 by HL	Mar 10, 1997 17:44 by HL
15	B3C-1(1-2')	170560-009	BTEX	SW-846	ppm	Standard	Mar 5, 1997 10:50		Mar 10, 1997 by CB	Mar 11, 1997 00:37 by CB
16			TPH	EPA 418.1	ppm	Standard	Mar 5, 1997 10:50		Mar 10, 1997 by HL	Mar 10, 1997 17:47 by HL
17	B3C-1(13-14')	170560-010	BTEX	SW-846	ppm	Standard	Mar 5, 1997 11:15		Mar 10, 1997 by CB	Mar 11, 1997 00:55 by CB
18			TPH	EPA 418.1	ppm	Standard	Mar 5, 1997 11:15		Mar 10, 1997 by HL	Mar 10, 1997 17:50 by HL
19	B3C-2(5-6')	170560-011	BTEX	SW-846	ppm	Standard	Mar 5, 1997 14:10		Mar 10, 1997 by CB	Mar 11, 1997 01:12 by CB
20			TPH	EPA 418.1	ppm	Standard	Mar 5, 1997 14:10		Mar 10, 1997 by HL	Mar 10, 1997 17:53 by HL
21	B3C-2(13-14')	170560-012	BTEX	SW-846	ppm	Standard	Mar 5, 1997 14:50		Mar 10, 1997 by CB	Mar 10, 1997 16:00 by CB
22			TPH	EPA 418.1	ppm	Standard	Mar 5, 1997 14:50		Mar 10, 1997 by HL	Mar 10, 1997 17:56 by HL

XENCO Laboratories

CERTIFICATE OF ANALYSIS SUMMARY 1-70560

K.E.I. Consultants, Inc.

Project ID: 610057-2-3,3A,3B,3C
Project Name: TNMPL Monument
Project Manager: Ann Baker
Project Location: Sites 3,3A,3B,3C

Date Received in Lab : Mar 7, 1997 10:10 by CB
Date Report Faxed: Mar 12, 1997
XENCO contact : Carlos Castro/Edward Yonemoto

Analysis Requested	*Lab ID:*	170560-001	170560-002	170560-003	170560-004	170560-006	170560-007	170560-008	170560-009	170560-010
	Field ID:	B3-1	B3-1	B3A-1	B3A-1	B3A-1	B3B-1	B3B-1	B3C-1	B3C-1
	Depth:	1-2'	13-14'	4-5'	6-7'	10-11'	4-5'	13-14'	1-2'	13-14'
BTEX by EPA 8020		Date Analyzed - Analytical Results								**ppm (mg/L - mg/Kg)**
		Mar 10, 1997	Mar 10, 1997	Mar 10, 1997	Mar 11, 1997	Mar 10, 1997	Mar 11, 1997	Mar 11, 1997	Mar 11, 1997	Mar 11, 1997
Benzene		< 0.020	< 0.020	< 0.020	< 0.050	< 0.020	< 0.020	< 0.020	< 0.020	< 0.020
Toluene		< 0.020	< 0.020	< 0.020	0.135	< 0.020	< 0.020	< 0.020	< 0.020	< 0.020
Ethylbenzene		< 0.020	< 0.020	< 0.020	0.082	< 0.020	< 0.020	< 0.020	< 0.020	< 0.020
m,p-Xylenes		< 0.040	< 0.040	< 0.040	0.387	< 0.040	< 0.040	< 0.040	< 0.040	< 0.040
o-Xylene		< 0.020	< 0.020	< 0.020	0.102	< 0.020	< 0.020	< 0.020	< 0.020	< 0.020
Total BTEX		< 0.120	< 0.120	< 0.120	0.706	< 0.120	< 0.120	< 0.120	< 0.120	< 0.120
Total Petroleum Hydrocarbons by EPA 418.1		Date Analyzed - Analytical Results								**ppm (mg/L - mg/Kg)**
		Mar 10, 1997	Mar 10, 1997	Mar 10, 1997	Mar 10, 1997	Mar 10, 1997	Mar 10, 1997	Mar 10, 1997	Mar 10, 1997	Mar 10, 1997
Total Petroleum Hydrocarbons		48.0	38.0	49.5	2830	31.5	37.0	52.0	36.0	56.0

Edward H. Yonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

CERTIFICATE OF ANALYSIS SUMMARY 1-70560

K.E.I. Consultants, Inc.

Project ID: 610057-2-3,3A,3B,3C
Project Name: TNMPL Monument
Project Manager: Ann Baker
Project Location: Sites 3,3A,3B,3C

Date Received in Lab : Mar 7, 1997 10:10 by CB
Date Report Faxed: Mar 12, 1997
XENCO contact : Carlos Castro/Edward Yonemoto

Analysis Requested	*Lab ID:*	170560-011	170560-012
	Field ID:	B3C-2	B3C-2
	Depth:	5-6'	13-14'
BTEX by EPA 8020		Date Analyzed - Analytical Results	**ppm (mg/L - mg/Kg)**
		Mar 11, 1997	Mar 10, 1997
Benzene		< 0.020	< 0.020
Toluene		< 0.020	< 0.020
Ethylbenzene		< 0.020	< 0.020
m,p-Xylenes		< 0.040	< 0.040
o-Xylene		< 0.020	< 0.020
Total BTEX		< 0.120	< 0.120
Total Petroleum Hydrocarbons by EPA 418.1		Date Analyzed - Analytical Results	**ppm (mg/L - mg/Kg)**
		Mar 10, 1997	Mar 10, 1997
Total Petroleum Hydrocarbons		30.5	26.5

Edward H. Yonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

Certificate Of Quality Control for Batch : 17A25A73

SW- 846 5030/8020 BTEX

Date Validated: Mar 11, 1997 10:00
Date Analyzed: Mar 10, 1997 13:07
QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: CB
Matrix: Solid

	MATRIX SPIKE / MATRIX SPIKE DUPLICATE AND RECOVERY										
Q.C. Sample ID 170565- 002	[A] Sample Result	[B] Matrix Spike Result	[C] Matrix Spike Duplicate Result	[D] Matrix Spike Amount	[E] Method Detection Limit	Matrix Limit Relative Difference	[F] QC Spike Relative Difference	[G] QC Matrix Spike Recovery	[H] QC M.S.D. Recovery	[I] Matrix Spike Recovery Range	[J] Qualifier
Parameter	ppm	ppm	ppm	ppm	ppm	%	%	%	%	%	
Benzene	< 0.020	2.160	2.020	2.000	0.020	25.0	6.7	108.0	101.0	65-135	
Toluene	< 0.020	2.060	1.938	2.000	0.020	25.0	6.1	103.0	96.9	65-135	
Ethylbenzene	< 0.020	2.180	2.040	2.000	0.020	25.0	6.6	109.0	102.0	65-135	
m,p-Xylenes	< 0.040	4.440	4.180	4.000	0.040	25.0	6.0	111.0	104.5	65-135	
o-Xylene	< 0.020	2.180	2.040	2.000	0.020	25.0	6.6	109.0	102.0	65-135	

Spike Relative Difference [F] = 200*(B-C)/(B+C)
Matrix Spike Recovery [G] = 100*(B-A)/[D]
M.S.D. = Matrix Spike Duplicate
M.S.D. Recovery [H] = 100*(C-A)/[D]
N.D. = Below detection limit or not detected
All results are based on MDL and validated for QC purposes

Edward H. Yonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

Certificate Of Quality Control for Batch : 17A25A74

SW- 846 5030/8020 BTEX

Date Validated: Mar 11, 1997 11:00
Analyst: CB
Date Analyzed: Mar 10, 1997 22:18
Matrix: Solid
QA/QC Manager: Edward H. Yonemoto, Ph.D.

	MATRIX SPIKE / MATRIX SPIKE DUPLICATE AND RECOVERY										
Q.C. Sample ID 170563- 001	[A] Sample Result	[B] Matrix Spike Result	[C] Matrix Spike Duplicate Result	[D] Matrix Spike Amount	[E] Method Detection Limit	Matrix Limit Relative Difference	[F] QC Spike Relative Difference	[G] QC Matrix Spike Recovery	[H] QC M.S.D. Recovery	[I] Matrix Spike Recovery Range	[J] Qualifier
Parameter	ppm	ppm	ppm	ppm	ppm	%	%	%	%	%	
Benzene	< 0.020	1.762	1.798	2.000	0.020	25.0	2.0	88.1	89.9	65-135	
Toluene	< 0.020	1.784	1.842	2.000	0.020	25.0	3.2	89.2	92.1	65-135	
Ethylbenzene	< 0.020	1.856	1.934	2.000	0.020	25.0	4.1	92.8	96.7	65-135	
m,p-Xylenes	< 0.040	3.740	3.940	4.000	0.040	25.0	5.2	93.5	98.5	65-135	
o-Xylene	< 0.020	1.808	1.928	2.000	0.020	25.0	6.4	90.4	96.4	65-135	

Spike Relative Difference [F] = 200*(B-C)/(B+C)
Matrix Spike Recovery [G] = 100*(B-A)/[D]
M.S.D. = Matrix Spike Duplicate
M.S.D. Recovery [H] = 100*(C-A)/[D]
N.D. = Below detection limit or not detected
All results are based on MDL and validated for QC purposes

Edward H. Yonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

Certificate Of Quality Control for Batch : 17A25A75

SW- 846 5030/8020 BTEX

Date Validated: Mar 11, 1997 16:30
Date Analyzed: Mar 11, 1997 09:38
QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: CB
Matrix: Solid

	MATRIX SPIKE / MATRIX SPIKE DUPLICATE AND RECOVERY										
Q.C. Sample ID 170563- 002	[A] Sample Result	[B] Matrix Spike Result	[C] Matrix Spike Duplicate Result	[D] Matrix Spike Amount	[E] Method Detection Limit	Matrix Limit Relative Difference	[F] QC Spike Relative Difference	[G] QC Matrix Spike Recovery	[H] QC M.S.D. Recovery	[I] Matrix Spike Recovery Range	[J] Qualifier
Parameter	ppm	ppm	ppm	ppm	ppm	%	%	%	%	%	
Benzene	< 0.020	1.866	1.784	2.000	0.020	25.0	4.5	93.3	89.2	65-135	
Toluene	< 0.020	1.884	1.810	2.000	0.020	25.0	4.0	94.2	90.5	65-135	
Ethylbenzene	< 0.020	1.872	1.800	2.000	0.020	25.0	3.9	93.6	90.0	65-135	
m,p-Xylenes	< 0.040	3.840	3.680	4.000	0.040	25.0	4.3	96.0	92.0	65-135	
o-Xylene	< 0.020	1.882	1.812	2.000	0.020	25.0	3.8	94.1	90.6	65-135	

Spike Relative Difference [F] = 200*(B-C)/(B+C)
Matrix Spike Recovery [G] = 100*(B-A)/[D]
M.S.D. = Matrix Spike Duplicate
M.S.D. Recovery [H] = 100*(C-A)/[D]
N.D. = Below detection limit or not detected
All results are based on MDL and validated for QC purposes

Edward H. Yonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

Certificate Of Quality Control for Batch : 17A30A82

EPA 418.1 Total Petroleum Hydrocarbons

Date Validated: Mar 11, 1997 11:00
Date Analyzed: Mar 10, 1997 17:29
QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: HL
Matrix: Solid

	MATRIX SPIKE ANALYSIS						
Q.C. Sample ID 170560- 003	[A] Sample Result	[B] Matrix Spike Result	[C] Matrix Spike Amount	[D] Method Detection Limit	[E] QC Matrix Spike Recovery	[F] LIMITS Recovery Range	[G] Qualifier
Parameter	ppm	ppm	ppm	ppm	%	%	
Total Petroleum Hydrocarbons	49.50	211	198	7.50	81.7	65-135	

Matrix Spike Recovery [E] = 100*(B-A)/(C)
N.C. = Not calculated, data below detection limit
N.D. = Below detection limit
All results are based on MDL and validated for QC purposes only

Edward H. Yonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

Certificate Of Quality Control for Batch : 17A30A82

EPA 418.1 Total Petroleum Hydrocarbons

Date Validated: Mar 11, 1997 11:00
Date Analyzed: Mar 10, 1997 17:34
QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: HL
Matrix: Solid

	MATRIX DUPLICATE ANALYSIS					
Q.C. Sample ID 170560- 004	[A] Sample Result	[B] Duplicate Result	[C] Method Detection Limit	[D] QC Relative Difference	[E] LIMITS Relative Difference	[F] Qualifier
Parameter	ppm	ppm	ppm	%	%	
Total Petroleum Hydrocarbons	2830	3170	75.0	11.3	30.0	

Relative Difference [D] = 200*(B-A)/(B+A)
N.C. = Not calculated. data below detection limit
N.D. = Below detection limit
All results are based on MDL and validated for QC purposes only

Edward H. Yonemoto, Ph.D.
QA/QC Manager

XENCO Laboratories

Certificate Of Quality Control for Batch : 17A30A82

EPA 418.1 Total Petroleum Hydrocarbons

Date Validated: Mar 11, 1997 11:00
Date Analyzed: Mar 10, 1997 17:11
QA/QC Manager: Edward H. Yonemoto, Ph.D.

Analyst: HL
Matrix: Solid

BLANK SPIKE ANALYSIS

Parameter	[A] Blank Result ppm	[B] Blank Spike Result ppm	[C] Blank Spike Amount ppm	[D] Method Detection Limit ppm	[E] QC LIMITS Blank Spike Recovery %	[F] QC LIMITS Recovery Range %	[G] Qualifier
Total Petroleum Hydrocarbons	< 7.50	186	198	7.50	94.1	65-135	

Blank Spike Recovery [E] = 100*(B-A)/(C)
N.C. = Not calculated, data below detection limit
N.D. = Below detection limit
All results are based on MDL and validated for QC purposes only

Edward H. Yonemoto, Ph.D.
QA/QC Manager

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE COMPANY
ATTN : MR. TONY SAVOIE
P.O. BOX 1030
JAL, NM 88252
FAX: 915-395-2636

RECEIVING DATE: 04/08/97
SAMPLE TYPE: SOIL
PROJECT: TNMPL SITE #3A-3C-3B-4
PROJECT NAME: NONE GIVEN
PROJECT LOCATION: MONUMENT, NM.

ANALYSIS DATE: 04/08/97
SAMPLING DATE: 04/07/97
SAMPLE CONDITION: Intact/Iced

ELT#	FIELD CODE	TPH (mg/kg)
10679	3B - AREA 3 - NORTH SIDE WALL	130
10680	3B - AREA 3 - SOUTH SIDE WALL	550
10681	3B - AREA 3 - EAST SIDE WALL	140
10682	3B - AREA 2 - BOTTOM HOLE	<10
10683	3B - AREA 2 - NORTH SIDE WALL	40
10684	3B - AREA 2 - WEST SIDE WALL	160
10685	SITE 4 - NORTH WEST SIDE WALL	4,440
10686	SITE 4 - SOUTH WEST SIDE WALL	3,260
10687	SITE 4 - BOTTOM HOLE	1,980
10688	SITE 4 - NORTH EAST SIDE WALL	860
10689	SITE 4 - SOUTH EAST SIDE WALL	1,330
	QUALITY CONTROL	216
	TRUE VALUE	202
	% PRECISION	107

Methods: EPA 418.1

Michael R. Fowler

4-8-97
Date

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ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE COMPANY
ATTN : MR. TONY SAVOIE
P.O. BOX 1030
JAL, NM 88252
FAX: 915-395-2636

RECEIVING DATE: 04/08/97
SAMPLE TYPE: SOIL
PROJECT: TNMPL SITE #3A-3C-3B-4
PROJECT NAME: NONE GIVEN
PROJECT LOCATION: MONUMENT, NM.

ANALYSIS DATE: 04/08/97
SAMPLING DATE: 04/07/97
SAMPLE CONDITION: Intact/Iced

ELT#	FIELD CODE	TPH (mg/kg)
10669	3A - BOTTOM HOLE	200
10670	3A - NORTH SIDE WALL	250
10671	3A - WEST SIDE WALL	4,360
10672	3A - SOUTH SIDE WALL	1,230
10673	3A - EAST SIDE WALL	130
10674	3A - DEEP BOTTOM HOLE	190
10675	3C - EAST SIDE WALL	100
10676	3B - AREA 1 - BOTTOM HOLE	20
10677	3B - AREA 3 - BOTTOM HOLE	<10
10678	3B - AREA 3 - WEST SIDE WALL	40

QUALITY CONTROL	211
TRUE VALUE	202
% PRECISION	104

Methods: EPA 418.1

Michael R. Fowler

4-8-97
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1713

80'd

Environmental Lab of Texas, Inc.

12600 West I-20 East Odessa, Texas 79763
(915) 563-1800 FAX (915) 563-1713

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager:

Phone #: 915/682-3546
FAX #: 915/682-4182

Company Name & Address:
ALLLSTATE SERVICES ENVIRONMENTAL, MIDLAND, TEXAS

Project #: TRUMBL SITE #3A-3-C-3-B + #4

Project Name:

Project Location: MONUMENT. N. MEX

Sampler Signature:

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	OTHER	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	OTHER	SAMPLING: DATE	TIME	BTEX 8021B/5030	TPH 418.1	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	TDS	RCI
10680	B-B AREA 3 South S.W.	1			✓						✓			4-7-97	16:25		✓						
10681	B-B AREA 3 East S.W	1			✓						✓			4-7-97	16:29		✓						
10682	B-B AREA 2 Bottom H.	1			✓						✓			4-7-97	16:33		✓						
10683	B-B AREA 2 North S.W	1			✓						✓			4-7-97	16:37		✓						
10684	B-B AREA 2 West S.W	1			✓						✓			4-7-97	16:40		✓						
10685	SITE 4- N.W. SIDEWALL	1			✓						✓			4-7-97	16:45		✓						
10686	SITE 4- S.W. SIDEWALL	1			✓						✓			4-7-97	16:48		✓						
10687	SITE 4- Bottom Hole	1			✓						✓			4-7-97	16:52		✓						
10688	SITE 4- N.E. SIDEWALL	1			✓						✓			4-7-97	16:55		✓						
10689	SITE 4- S.E. SIDEWALL	1			✓						✓			4-7-97	17:00		✓						

Relinquished by:	Date:	Time:	Received by:
	4-8-97	0730	
Relinquished by:	Date:	Time:	Received by:
	4-8-97	0930	
Relinquished by:	Date:	Time:	Received by Laboratory:

REMARKS

Environmental Lab of Texas, Inc.

12600 West I-20 East Odessa, Texas 79763
(915) 563-1800 FAX (915) 563-1713

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager:

Phone #: 915/682-3546
FAX #: 915/682-4182

Company Name & Address:
ALLSTATE SERVICES ENVIRONMENTAL, MIDLAND, TEXAS

Project #:

Project Name:
TNMPL Site #3A-3-C-3B-5'

Project Location:
MONUMENT N. MEXICO

Sampler Signature:

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	OTHER	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	OTHER	SAMPLING: DATE	TIME	BTEX 8021B/5030	TPH 418.1	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	TDS	RCI
10669	3A-Bottom Hole	1			✓						✓			4-7-97	1500		✓						
10670	3A-North Sidewall	1			✓						✓			4-7-97	1523		✓						
10671	3A-West Sidewall	1			✓						✓			4-7-97	1527		✓						
10672	3A-South Sidewall	1			✓						✓			4-7-97	1530		✓						
10673	3A-East Sidewall	1			✓						✓			4-7-97	1535		✓						
10674	3A-Deep Bottom Hole	1			✓						✓			4-7-97	1540		✓						
10675	3-C-East Sidewall	1			✓						✓			4-7-97	1600		✓						
10676	3-B Area 1-Bottom Hole	1			✓						✓			4-7-97	1609		✓						
10677	3-B Area 3-Bottom Hole	1			✓						✓			4-7-97	1612		✓						
10678	3-B Area 3-West S.W.	1			✓						✓			4-7-97	1617		✓						
10679	3-B Area 3-North S.W.	1			✓						✓			4-7-97	1621		✓						

Relinquished by:	Date:	Time:	Received by:
	4-8-97	0730	
Relinquished by:	Date:	Time:	Received by:
	4-8-97	0930	
Relinquished by:	Date:	Time:	Received by Laboratory:

REMARKS

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE
ATTN: MR. TONY SAVOIE
P.O. BOX 1030
JAL, NEW MEXICO 88252
FAX: 505-395-2636
FAX: 915-682-4182

Receiving Date: 04/18/97
Sample Type: SOIL
Project #: SITE #4, 3B, 3A
Project Name: TEXAS NEW MEXICO
Project Location: LEA CO. NEW MEXICO

Analysis Date: 04/21/97
Sampling Date: 04/18/97
Sample Condition: Intact/Iced

ELT#	FIELD CODE	TPH mg/kg
10871	970418, SITE 4 E. SIDE WALL	24
10872	970418, SITE 4 N. SIDE WALL	152
10873	970418, SITE 4 W. SIDE WALL	88
10874	970418, SITE 4 S. SIDE WALL	160
10875	970418, SITE 4 BOTTOM HOLE	120
10876	970418, N. DIRT PILE	1,600
10877	970418, S. DIRT PILE	672
10878	970418, BACKGROUND #4	104
10879	970418, BACKGROUND 3-B	24
10880	970418, 3-B N. DIRT PILE	2,872
10881	970418, 3-B S. DIRT PILE	25,120
10882	970418, 3-A BOTTOM HOLE	48
10883	970418, 3A-W. SIDE WALL	208
10884	970418, 3A-N. SIDE WALL	104
10885	970418, 3A-S. SIDE WALL	<10
10886	970418, 3A-E. DIRT PILE	3,640
10887	970418, 3A-W. DIRT PILE	200
10888	970418, 3A- BACKGROUND	56
	BLANK	<10
	% INSTRUMENT ACCURACY	109
	% EXTRACTION ACCURACY	90

METHOD: EPA 418.1

Michael R. Fowler

4-21-97
Date

Environmental Lab of Texas, Inc.

12600 West I-20 East Odessa, Texas 79763
(915) 563-1800 FAX (915) 563-1713

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager:

Phone #: 915/682-3546
FAX #: 915/682-4182

Company Name & Address:
ALLLSTATE SERVICES ENVIRONMENTAL, MIDLAND, TEXAS

Project #: SITE #4 + 3-B

Project Name: TEX NEW MEX

Project Location: LEA CO. NMEX

Sampler Signature:

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	OTHER	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	OTHER	SAMPLING: DATE	TIME	BTEX 8(1)20/5(1)30	TPH 418.1	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	TDS	RCI
10871	970418 SITE 4 E-SIDEWALL	1			✓						✓			4/18/97	0944	✓	✓						
10872	970418 SITE 4 N. SIDEWALL	1			✓						✓			4/18/97	0945	✓	✓						
10873	970418 SITE 4 W. SIDEWALL	1			✓						✓			4/18/97	0950	✓	✓						
10874	970418 SITE 4 S. SIDEWALL	1			✓						✓			4/18/97	0954	✓	✓						
10875	970418 SITE 4 BOTTOM HOLE	1			✓						✓			4/18/97	0957	✓	✓						
10876	970418 N. DIRT PILE	1			✓						✓			4/18/97	1003		✓						
10877	970418 S. DIRT PILE	1			✓						✓			4/18/97	1010		✓						
10878	970418 BACKGROUND #4	1			✓						✓			4/18/97	1020		✓						
10879	970418 BACKGROUND 3-B	1			✓						✓			4/18/97	1100		✓						
10880	970418 3-B N DIRT PILE				✓						✓			4/18/97	1110		✓						
10881	970418 3-B S. DIRT PILE				✓						✓			4/18/97	1115		✓						

Relinquished by:	Date:	Time:	Received by:
	4-18-97	14:25	
Relinquished by:	Date:	Time:	Received by:
Relinquished by:	Date:	Time:	Received by Laboratory:

REMARKS

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE COMPANY
ATTN: MR. TONY SAVOIE
P.O. BOX 1030
JAL, NM 88252
FAX: 915-682-4182
FAX: 505-395-2636

Receiving Date: 04/18/97
Sample Type: SOIL
Project : SITE #4, 3B, 3A
Project Location: LEA CO, NEW MEXICO

Analysis Date: 04/21/97
Sampling Date: 04/18/97
Sample Condition: Intact/Iced

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
10871	970418, SITE 4 E. SIDE WALL	0.183	<0.100	<0.100	<0.100	<0.100
10872	970418, SITE 4 N. SIDE WALL	<0.100	<0.100	<0.100	<0.100	<0.100
10873	970418, SITE 4 W. SIDE WALL	0.205	<0.100	<0.100	<0.100	<0.100
10874	970418, SITE 4 S. SIDE WALL	0.130	<0.100	<0.100	<0.100	<0.100
10875	970418, SITE 4 BOTTOM HOLE	0.412	0.236	0.190	0.271	0.157
10882	970418, 3-A BOTTOM HOLE	0.144	<0.100	<0.100	<0.100	<0.100
10883	970418, 3A-W. SIDE WALL	0.135	<0.100	<0.100	<0.100	<0.100
10884	970418, 3A-N. SIDE WALL	0.114	<0.100	<0.100	<0.100	<0.100
10885	970418, 3A-S. SIDE WALL	<0.100	<0.100	<0.100	<0.100	<0.100
	% IA	104	105	110	109	110
	% EA	93	97	100	98	98
	BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8020,5030

Michael R. Fowler

4-22-97
Date

Environmental Lab of Texas, Inc.

12600 West I-20 East Odessa, Texas 79763
(915) 563-1800 FAX (915) 563-1713

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager:

Phone #: 915/682-3546
FAX #: 915/682-4182

Company Name & Address:
ALLLSTATE SERVICES ENVIRONMENTAL, MIDLAND, TEXAS

Project #: 3-A

Project Name: TEX NEW MEX 3-A

Project Location: LEA CO N.MEX

Sampler Signature:

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	OTHER	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	OTHER	SAMPLING: DATE	TIME	ANALYSIS REQUEST: BTEX 8020/5030	TPH 418.1	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	TDS	RCI
10882	970418 3-A Bottom Hole	1				✓					✓			4-18-97		✓	✓						
10883	970418 3A-W SIDEWALL	1				✓					✓			4-18-97		✓	✓						
10884	970418 3A-N SIDEWALL	1				✓					✓			4-18-97		✓	✓						
10885	970418 3A-S SIDEWALL	1				✓					✓			4-18-97		✓	✓						
10886	970418 3AE. DIRT PILE	1				✓					✓			4-18-97			✓						
10887	970418 3A-W DIRT PILE	1				✓					✓			4-18-97			✓						
10888	970418 3A-BACKGROUND	1				✓					✓			4-18-97			✓						

Relinquished by:	Date:	Time:	Received by:
	4-18-97	14:25	
Relinquished by:	Date:	Time:	Received by:
Relinquished by:	Date:	Time:	Received by Laboratory:

REMARKS

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE COMPANY
ATTN: MR. TONY SAVOIE
P.O. BOX 1030
JAL, NM 88252
FAX: 915-682-4182
FAX: 505-395-2636

RECEIVING DATE: 04/21/97
SAMPLE TYPE: SOIL
PROJECT #: SITE 3-A
PROJECT NAME: TNM 3A
PROJECT LOCATION: LEA CO. NEW MEXICO

ANALYSIS DATE: 04/22/97
SAMPLING DATE: 04/21/97
SAMPLE CONDITION: Intact/Iced

ELT#	FIELD CODE	TPH (mg/kg)
10903	970421 WSW	20
	QUALITY CONTROL	278
	TRUE VALUE	264
	% PRECISION	105

Methods: EPA 418.1

Michael R. Fowler

4-22-97
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1713

Environmental Lab of Texas, Inc.

12600 West I-20 East Odessa, Texas 79763
(915) 563-1800 FAX (915) 563-1713

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager:

Phone #: 915/682-3546
FAX #: 915/682-4182

Company Name & Address:
ALLLSTATE SERVICES ENVIRONMENTAL, MIDLAND, TEXAS

Project #: SITE 3-A

Project Name: TNM 3A

Project Location: LEA CO. NEW MEX

Sampler Signature:

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	OTHER	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	OTHER	SAMPLING: DATE	TIME	ANALYSIS REQUEST: BTEX 8020/5030	TPH 418.1	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	TDS	RCI
10903	970421 4154	1			✓						✓			4-21-97	1340		✓						

Relinquished by:	Date:	Time:	Received by:
	4-21-97	1410	
Relinquished by:	Date:	Time:	Received by:
Relinquished by:	Date:	Time:	Received by Laboratory:

REMARKS

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: TNM Sites 3, 3A, 3B, 3C & 4 Monument area, Lea County

Source: Crude Oil Pipeline SPILL

Disposal Location: C & C LandFarm Inc. 2 miles South of Monument NM

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

I, the undersigned as the agent for the Texas New Mexico Pipeline Co. concur with the status of the waste from the subject site.

NAME John A. Savoie

TITLE/AGENCY Senior Tech

ADRESS P.O. Box 1030

SIGNATURE John A. Savoie

DATE 4-23-97

OCD HOBBS OFFICE
APR 23 1997
RECEIVED

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

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

Form C-13
Originated 8/8/9

Submit Origin
Plus 1 Cop
to appropria
District Offic

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ — per W Price - NMOCD 4/23/97 Verbal Approval Received: Yes ☒ No ☐	4. Generator Texas N.M. Pipeline Company
	5. Originating Site Cooper Sites 3, 3A, 3B, 3C & 4
2. Management Facility Destination C+C Landfarm Inc.	6. Transporter Turner Trucking
3. Address of Facility Operator 2 miles South of Monument	8. State New Mexico
7. Location of Material (Street Address or ULSTR) NE1/4 SW1/4 Sect. 36, T19S, R36E	

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

Crude oil Affected Soil

Non HAZardous By Knowledge OF Process N.M.O.C.D
Approved November, 1996

OCD HOBBS OFFICE
APR 23 1997
RECEIVED

Estimated Volume 3000 cy Known Volume (to be entered by the operator at the end of the haul) ______ cy

SIGNATURE: [signature] Waste Management Facility Authorized Agent TITLE: Pres. DATE: 4-15-97

TYPE OR PRINT NAME: Jimmy T. Cooper TELEPHONE NO. ______

(This space for State Use)

APPROVED BY: [signature] TITLE: Env Engr DATE: 4/23/97

APPROVED BY: ______ TITLE: ______ DATE: ______

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

January 8, 1999

CERTIFIED MAIL
RETURN RECEIPT NO: Z-274-520-586

Mr. Tony Savoie
Texas-New Mexico Pipe Line Company
P.O. Box 1030
Jal, New Mexico 88252

RE: CLOSURE REPORT
MONUMENT SITE #3

Dear Mr. Savoie:

The New Mexico Oil Conservation Division (OCD) has completed a review of Texas-New Mexico Pipe Line Company's (TNMPLC) August 20, 1998 "CLOSURE REPORT, MONUMENT SITE 3, 3A, 3B, 3C, UNIT K, SECTION 36, TOWNSHIP 19 SOUTH, RANGE 36 EAST, LEA COUNTY, NEW MEXICO, JOB NO. 610057-2-3" and February 24, 1998 "CLOSURE REPORT, TEXAS-NEW MEXICO PIPE LINE COMPANY, MONUMENT SITE 3, 3A, 3B, 3C, LEA COUNTY, NEW MEXICO which were submitted on behalf of TNMPLC by their consultant KEI. These documents request closure of remedial actions resulting from a crude oil pipeline spill at TNMPLC's Monument No. 3 site.

The above referenced closure request is approved. Please be advised that OCD approval does not relieve TNMPLC of liability if remaining contamination poses a future threat to ground water , surface water, human health or the environment. In addition, OCD approval does not relieve TNMPLC of responsibility for compliance with any other federal, state or local laws and regulations

If you have any questions, please contact me at (505) 827-7154.

Sincerely,

William C. Olson
Hydrologist
Environmental Bureau

xc: Wayne Price, OCD Aztec Office
Mike Matush, State Land Office
Theresa Nix, KEI