

Highlander Environmental Corp.

Midland, Texas

August 16, 2004

HOBES 10-007

Mr. Larry Johnson Environmental Engineer Specialist Oil Conservation Division- District I 1625 N. French Drive P. O. Box 1980 Hobbs, New Mexico 88240

RE: Closure Report for the Spill Area at the Pogo Producing Company (Arch Petroleum, Inc.), C. E. Lamunyon Well #44 Located in Section 22, Township 23 South, Range 37 East, Lea County, New Mexico.

Dear Mr. Johnson:

Highlander Environmental Corp. (Highlander) was contacted by Pogo Producing Company (Pogo) to assess a spill, which occurred at the Pogo Producing Company (Arch) C.E. Lamunyon #44 spill in Lea County, New Mexico (Site). The Site is located in Section 22, Township 23 South, Range 37 East. The State of New Mexico C-141 (Initial) is shown in Appendix A. The Site is shown in Figure 1.

Background

On September 26, 1999, the spill occurred on the south edge of the caliche pad and road of Well #44. Two frac tanks were in use at the well site as storage tanks, and one overflowed impacting the surface soil. Approximately 15 barrels of oil were released onto the surface soil. The soil impact was observed under the frac tanks on the caliche road and southwest of the tanks on native cover. The impacted area immediately under or near the frac tanks measured approximately 10'x 70'. The southwest areas (native soil) measured approximately 3' x 35' and 15' x 10'.

Groundwater and Regulatory

A risk-based evaluation was performed for the Site in accordance with the New Mexico Oil Conservation Division (NMOCD) Guidelines for Remediation of Leaks, Spills and Releases, dated August 13, 1993. The guidelines require a risk-based evaluation of the site to determine recommended remedial action levels (RRAL) for benzene, toluene, ethylbenzene and xylene (collectively referred to as BTEX) and total petroleum hydrocarbons (TPH) in soil. The proposed RRAL for benzene was determined to be 10 parts per million (ppm) or milligrams per kilogram (mg/kg) and 50 ppm for total BTEX (sum of benzene, toluene, ethylbenzene and xylene). Based on the regional groundwater data, the proposed RRAL for TPH is 1,000 mg/kg.

Previous Assessment and Corrective Action

Highlander previously submitted the report "Soil Investigation and Work Plan for Spill Area located at the Pogo C.E. Lamunyon Well #44, Lea County, New Mexico, dated October 4, 1999, to the NMOCD for review. The report discusses the assessment and sampling performed at the Site. The assessment report is shown in Appendix B. Based on the assessment, the Site showed a shallow impact. As recommended in the assessment report, the impacted area at the frac tanks were excavated and properly disposed. The impacted area south of the frac tanks (native soil) were remediated onsite. The soils were tilled and fertilized to enhance the remediation. Periodic composite samples were obtained to evaluate remediation efforts.

A summary of the activities performed at the Site are summarized below.

September 28, 1999	Highlander Environmental Corp. (Highlander) assessed the spill areas. Four sample points (SP-1, SP-2, SP-3 and SP-4) were installed at the spill areas to define the extents of the impact. The results showed a shallow impact at the frac tank area and native soil area to a depth of 1.0' below surface. Figure 1 shows the areas of impact and sample point locations. The results are shown in Table 1, Appendix B.
October 10, 1999	Highlander supervised the excavation of the impacted soil/caliche under the frac tanks. Once excavated, the area was backfilled with clean caliche. The soil removed was transported to Sundance, Inc. in Eunice, New Mexico for disposal.
January 5, 2000	Highlander collected a composite sample from the remediated area (native soil), which showed a total TPH concentration of 13,770 mg/kg. Highlander tilled and fertilized the area.
June 12, 2002	Highlander collected a composite sample from the remediated area (native soil), which showed a total TPH concentration of 1,800 mg/kg. Highlander tilled and fertilized the area.

Final Remediation and Results

As discussed in the Work Plan, the area located south of the frac tanks (native soil) required additional treatments and periodic maintenance to remediate the impacted soil to below 1,000 mg/kg TPH.

On June 10, 2004, Highlander collected two composite samples #1 (0-1') and #2 (0-1') from the native soil area. The results showed TPH concentrations of 37.4 mg/kg and 55.3 mg/kg below the RRAL. The BTEX analyses were all below the method detected limit.

Recommendations

Based on the results and remedial action performed at the Site, Pogo Producing Company (Arch) proposes closure of the spill area. The State of New Mexico C-141 (Final) is shown in Appendix A.

If you require any additional information or have any questions or comments concerning the investigation, please call.

Very/may yours. Ike Tavarez, P.G.

Project Manager/Geologist

cc: Don Riggs - Pogo Producing Co. Rex Jasper - Pogo Producing Co.

FIGURES





APPENDIX A

State of New Mexico Form C-141

District I 1625 N. French Dr., Hobbs, NM 88240 District II 1301 W. Grand Avenue, 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

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

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Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

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E-mail Addre	ess: itavarez	@hec-enviro	.com			Conditions of	Approval:			Attached								
Date: 8/	16/04	ř	Phone	: (432) 682-4559							-							

* Attach Additional Sheets If Necessary

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300 N. Marienfeld, Midland, TX 79701		Actepnotic 140	<u>(915)</u> 68	5-8100	
Facility Name C.E. Lamunyon, Well #44		Facility Type	Oil Well		
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Gary Wells - Pogo		9/28/	99		
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Frac tank overflow - stopped flow to	rac tanks				,
Describe Area Affected and Cleanup Action Taken. (Attach Additional Sheets If	Vecessary)				
Surface soil impact - area delineated for approval to remediate soil.	•	tted Wor	k Plan t	o NMOCD in Hol	bbs
I hereby certify that the information given above is true and complete to the best of a are required to report and/or file certain release notifications and perform corrective a C-141 report by the NMOCD marked as "Final Report" does not relieve the operat contamination that pose a threat to ground water, surface water, human health or the operator of responsibility for compliance with any other federal, state, or local law	ctions for releases v or of liability shoul	which may endar d their operation ddition_NMOC	nger public healt ns have failed to	h or the environment. The adequately investigate and	remediate
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APPENDIX B

Prior Report



Highlander Environmental Corp.

Midland, Texas

October 4, 1999

Ms. Donna Williams Environmental Bureau Oil Conservation Division P.O. Box 1980 Hobbs New Mexico

RE: Soil Investigation and Work Plan for Spill Area located at the Pogo C.E. Lamunyon Well #44, Lea County, New Mexico.

Dear Ms. Williams,

On September 28, 1999, Highlander Environmental Corp. (Highlander) was contacted to inspect a spill that occurred at the Lamunyon Lease in Lea County, New Mexico. The spill area was located at Well #44. The spill occurred on September 26, 1999 and approximately 15 barrel of oil impacted the surface soil. The depth to groundwater at the Site is greater than 50 feet below surface. A risk-based evaluation was performed for Site in accordance with the New Mexico Oil Conservation Division (NMOCD) Guidelines for Remediation of Leaks, Spills and Releases, dated August 13, 1993. The proposed recommended remedial action levels (RRAL) for TPH is 1,000 mg/kg for the Site. Soil samples were collected to evaluate for Total Petroleum Hydrocarbon (TPH) by method EPA 418.1 and chloride by method SW846-9252. The descriptions of the leak and sample collection are discussed below:

The spill occurred on the south edge of the pad and road of Well #44. Two frac tanks were in use at the well site, as storage tanks and one overflowed impacting the surface soil. The soil impact was observed under the frac tanks on caliche and southwest of the tanks on native cover. The impacted area immediately under or near the frac tanks measured approximately 10'x 70'. The southwest areas measured approximately 3' x 35' and 15' x 10'. Four sample points (SP-1, SP-2, SP-3 and SP-4) were installed at the spill areas to define the vertical extent of the impact. Figure 1 shows the areas of impact and sample point locations. The results are found in Table 1.

Referring to Table 1, the surface samples showed TPH levels ranging from 29,400 mg/kg (SP-3, 0-8") to 83,000 mg/kg (SP-4, 0-6"). The areas around SP-1 and SP-2 on the caliche show a shallow impact to approximately 4" and 8" below surface, respectively. The areas of SP-3 and SP-4 showed impact to approximately 1.0 below

surface. SP-3 soil samples were also analyzed for chloride had levels ranging from 106 mg/kg to 186 mg/kg. These levels should be at or near background levels for this area and are not considered an environmental concern. Copies of chemical analyses and Chain of Custody documentation are included with this report.

Conclusions and Recommendations

- 1. The impacted caliche under the two-frac tanks will be removed for offsite disposal. The area will be scraped from 0-8" using a backhoe. The soil removed will be disposed at Sundance, Inc. located in Eunice, New Mexico.
- 2. The native soil areas appear to be impacted to a shallow depth of approximately 1.0 feet below surface. The impacted soil will require some treatment and periodic maintenance to remediate to below 1,000 mg/kg TPH. The soil will be tilled to remediate these areas in place. Water and fertilizer will be added to the soil to enhance bio-remediation. On a monthly basis, the impacted soil will be tilled to a depth of 1.0' below surface until the TPH target level has been achieved. Periodic soil samples will be obtained to evaluate remediation efforts. Once the soil target level is achieved, a closure report will be submitted to the NMOCD.

If you require any additional information or have any questions or comments concerning the investigation, please call.

Very fruly yours; Ike Tavarez

Geologist

cc:

Don Riggs – Pogo Producing Co. Rex Jasper – Pogo Producing Co.





Table 1 Pogo Producing Company Lamunyon Well #44 Lea County, New Mexico Date Sampled: 9/28/99

Sample ID	Depth	TPH (mg/kg)	Chloride (mg/kg)
SP-1	4"-6"	130	NA
SP-1	6"-1.0'	<10	NA
SP-1	2-2.5'	<10	NA
SP-2	3"-6"	1,400	NA
SP-2	8"-1.5'	<10	NA
SP-2	2-2.5'	10	NA
SP-3	0-8"	29,400	106
SP-3	1-1.5'	10	160
SP-3	2-2.5'	<10	186
SP-4	0-6"	83,000	NA
SP-4	1-1.5'	<10	NA
SP-4	2-2.5'	<10	NA

NA - Not Analyzed



"Don't Treat Your Soil Like Dirt!"

HIGHLANDER ENVIRONMENTAL CORP. ATTN: MR. IKE TAVAREZ 1910 N. BIG SPRING STREET MIDLAND, TEXAS 79705 FAX: 915-682-3946

Sample Type: Soil Sample Condition: Intact/ loed Project #: 1354 Project Name: Pogo/ Lumunyon #44 Project Location: Lea Co., N.M. Sampling Date: 09/28/99 Receiving Date: 09/29/99 Analysis Date: 09/30/99

ELT#	FIELD CODE	TPH (mg/kg)	Chloride (mg/kg)	
20473	SP-1 (4"-6")	130	*	
20474	SP-1 (6"-1.0')	<10	*	
20475	SP-1 (2-2.5)	<10	•	
20476	SP-2 (3"-6")	1400	*	
20477	SP-2 (8"-1.5")	<10	•	
20478	SP-2 (2-2.5)	10	*	
20479	SP-3 (0-8")	29400	106	
20480	SP-3 (1.0'-1.5')	10	160	
20481	SP-3 (2-2.5)	<10	186	
20482	SP-4 (0-6")	83000	*	
20483	SP-4 (1-1.5)	<10	•	
20484	SP-4 (2-2.5')	<10	*	

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Methods: EPA 418.1 , SW 846-9252

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Please Fill out all copies - Laboratory retains yellow copy - Return original copy to Highlander Environmental Corp. - Project Manager retains pink copy - Accounting receives Gold copy.

PHOTOGRAPHIC DOCUMENTATION POGO - SPILL ASSESSMENT - LEA COUNTY C.E. Lamunyon #44



1. South view – Frac Tanks



2. View of surface spill area and SP-2 (Sample Point)

PHOTOGRAPHIC DOCUMENTATION POGO – SPILL ASSESSMENT - LEA COUNTY C.E. Lamunyon #44



3. West view - Surface spill area north of frac tanks



4. Southeast view - Surface spill area north of frac tanks

PHOTOGRAPHIC DOCUMENTATION POGO - SPILL ASSESSMENT - LEA COUNTY C.E. Lamunyon #44



7. Southwest view - Surface spill area southwest of frac tanks



8. Northeast view - Surface spill area southwest of frac tanks

APPENDIX C

Analytical Results



12600 West I-20 East - Odessa, Texas 79765

Analytical Report

Prepared for:

Ike Tavarez Highlander Environmental Corp. 1910 N. Big Spring St. Midland, TX 79705

Project: Pogo/ C.E. Lamunyen # 44 Project Number: 1354 Location: Lea County, NM

Lab Order Number: 4F14005

Report Date: 06/17/04

Highlander Environmental Corp. 1910 N. Big Spring St. Midland TX, 79705

06/17/04 16:47

ANALYTICAL REPORT FOR SAMPLES

Sample 1D	Laboratory ID	Matrix	Date Sampled	Date Received
#1 (0-1)	4F14005-01	Soil	06/10/04 00:00	06/11/04 17:35
#2 (0-1)	4F14005-02	Soil	06/10/04 00:00	06/11/04 17:35

Highlander Environmental Corp. 1910 N. Big Spring St. Midland TX, 79705

Project: Pogo/ C.E. Lamunyen # 44 Project Number: 1354 Project Manager: Ike Tavarez

Organics by GC

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
#1 (0-1) (4F14005-01) Soil									
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EF41405	06/14/04	06/15/04	EPA 8015M	
Diesel Range Organics >C12-C35	37.4	10.0	"	n		11			
Total Hydrocarbon C6-C35	37.4	10.0	"		n	11	н		
Surrogate: 1-Chlorooctane		79.2 %	70-1	30	"	"	"	17	
Surrogate: 1-Chlorooctadecane		75.0 %	70-1	30	"	"	"	"	
#2 (0-1) (4F14005-02) Soil									
Benzene	ND	0.0250	mg/kg dry	25	EF41706	06/16/04	06/17/04	EPA 8021B	
Toluene	ND	0.0250	Ħ	"	*	"	"	۳	
Ethylbenzene	ND	0.0250	*	11	*	"		*	
Xylene (p/m)	ND	0.0250	**	"	w	"	"	**	
Xylene (0)	ND	0.0250		n	n	n	"	n	
Surrogate: a,a,a-Trifluorotoluene		89.0 %	80-1	20	"	"	"	17	,
Surrogate: 4-Bromofluorobenzene		91.7 %	80-1	20	"	"	"	**	
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	EF41405	06/14/04	06/15/04	EPA 8015M	
Diesel Range Organics >C12-C35	55.3	10.0		"		n	n	17	
Total Hydrocarbon C6-C35	55.3	10.0		"	17	11		19	
Surrogate: 1-Chlorooctane		92.4 %	70-1	30	"	"	"	11	
Surrogate: 1-Chlorooctadecane		90.0 %	70-1	30	"	"	"	"	

Environmental Lab of Texas

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Page 2 of 9

General Chemistry Parameters by EPA / Standard Methods

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
#1 (0-1) (4F14005-01) Soil 	100		%	1	EF41406	06/14/04	06/14/04	% calculation	
#2 (0-1) (4F14005-02) Soil									
% Solids	100		%	1	EF41406	06/14/04	06/14/04	% calculation	

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Project: Pogo/ C.E. Lamunyen # 44 Project Number: 1354 Project Manager: Ike Tavarez

Organics by GC - Quality Control

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EF41405 - Solvent Extraction	(GC)									
Blank (EF41405-BLK1)	· · · · · ·			Prepared	& Analyze	ed: 06/14/	04			
Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet							
Diesel Range Organics >C12-C35	ND	10.0	н							
Total Hydrocarbon C6-C35	ND	10.0	н							
Surrogate: 1-Chlorooctane	37.6		mg/kg	50.0		75.2	70-130			
Surrogate: 1-Chlorooctadecane	38.3		"	50.0		76.6	70-130			
Blank (EF41405-BLK2)				Prepared:	06/14/04	Analyzed	: 06/15/04			
Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet							
Diesel Range Organics >C12-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	36.6		mg/kg	50.0	<u></u>	73.2	70-130			
Surrogate: 1-Chlorooctadecane	37.8		"	50.0		75.6	70-130			
LCS (EF41405-BS1)				Prepared	& Analyze	ed: 06/14/0	04			
Gasoline Range Organics C6-C12	407	10.0	mg/kg wet	500		81.4	75-125			· · · ·
Diesel Range Organics >C12-C35	518	10.0	"	500		104	75-125			
Total Hydrocarbon C6-C35	925	10.0	*	1000		92.5	75-125			
Surrogate: 1-Chlorooctane	55.2		mg/kg	50.0		110	70-130			
Surrogate: 1-Chlorooctadecane	42.4		"	50.0		84.8	70-130			
LCS (EF41405-BS2)				Prepared:	06/14/04	Analyzed	: 06/15/04			
Gasoline Range Organics C6-C12	414	10.0	mg/kg wet	500		82.8	75-125			
Diesel Range Organics >C12-C35	524	10.0	"	500		105	75-125			
Total Hydrocarbon C6-C35	938	10.0	n	1000		93.8	75-125			
Surrogate: 1-Chlorooctane	54.9		mg/kg	50.0		110	70-130			
Surrogate: 1-Chlorooctadecane	40.5		"	50.0		81.0	70-130			
Calibration Check (EF41405-CCV1)				Prepared:	06/14/04	Analyzed	: 06/15/04			
Gasoline Range Organics C6-C12	429		mg/kg	500		85.8	80-120			
Diesel Range Organics >C12-C35	510		"	500		102	80-120			
Total Hydrocarbon C6-C35	939		"	1000		93.9	80-120			
Surrogate: 1-Chlorooctane	55.4	· · · · · · · · · · · · · · · · · · ·	"	50.0		111	70-130			
Surrogate: 1-Chlorooctadecane	51.7		"	50.0		103	70-130			

The results in this report apply to the samples analyzed in accordance with the samples received in the laboratory.. This analytical report must be reproduced in its entirety, with written approval of Environmental Lab of Texas.

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Reported: 06/17/04 16:47

Organics by GC - Quality Control Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EF41405 - Solvent Extraction (GC)									
Calibration Check (EF41405-CCV2)				Prepared:	06/14/04	Analyzed	1: 06/15/04			
Gasoline Range Organics C6-C12	447		mg/kg	500		89.4	80-120			
Diesel Range Organics >C12-C35	514		11	500		103	80-120			
Total Hydrocarbon C6-C35	961		n	1000		96.1	80-120			
Surrogate: 1-Chlorooctane	47.6		- #	50.0		95.2	70-130			
Surrogate: 1-Chlorooctadecane	36.9		"	50.0		7 3 .8	70-130			
Matrix Spike (EF41405-MS1)	Sou	rce: 4F140	02-02	Prepared	& Analyze	ed: 06/14/	04			
Gasoline Range Organics C6-C12	492	10.0	mg/kg dry	562	ND	87.5	75-125			
Diesel Range Organics >C12-C35	57 5	10.0		562	ND	102	75-125			
Fotal Hydrocarbon C6-C35	1070	10.0		1120	ND	95.5	75-125			
Surrogate: 1-Chlorooctane	60.6		mg/kg	50.0		121	70-130			
Surrogate: 1-Chlorooctadecane	42.5		"	50.0		85.0	70-130			
Matrix Spike (EF41405-MS2)	Sou	rce: 4F140	02-21	Prepared:	06/14/04	Analyzed	: 06/15/04			
Gasoline Range Organics C6-C12	491	10.0	mg/kg dry	562	ND	87.4	75-125			
Diesel Range Organics >C12-C35	598	10.0	*	562	ND	106	75-125			
Total Hydrocarbon C6-C35	1090	10.0	Ħ	1120	ND	97.3	75-125			
Surrogate: 1-Chlorooctane	62.3		mg/kg	50.0		125	70-130			
Surrogate: 1-Chlorooctadecane	47.4		"	50.0		94.8	70-130			
Matrix Spike Dup (EF41405-MSD1)	Sou	rce: 4F140	02-02	Prepared	& Analyze	ed: 06/14/0	04			
Gasoline Range Organics C6-C12	483	10.0	mg/kg dry	562	ND	85.9	75-125	1.85	20	
Diesel Range Organics >C12-C35	588	10.0	"	562	ND	105	75-125	2.24	20	
Fotal Hydrocarbon C6-C35	1070	10.0	и	1120	ND	95.5	75-125	0.00	20	
Surrogate: 1-Chlorooctane	59.3		mg/kg	50.0		119	70-130			
Surrogate: 1-Chlorooctadecane	44.3		"	50.0		88.6	70-130			
Matrix Spike Dup (EF41405-MSD2)	Sou	rce: 4F140	02-21	Prepared:	06/14/04	Analyzed	: 06/15/04			
Gasoline Range Organics C6-C12	499	10.0	mg/kg dry	562	ND	88.8	75-125	1.62	20	
Diesel Range Organics >C12-C35	592	10.0	"	562	ND	105	75-125	1.01	20	
Total Hydrocarbon C6-C35	1090	10.0	"	1120	ND	97.3	75-125	0.00	20	
Surrogate: 1-Chlorooctane	61.2	·····	mg/kg	50.0		122	70-130			
Surrogate: 1-Chlorooctadecane	47.4		"	50.0		94.8	70-130			

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Reported: 06/17/04 16:47

Organics by GC - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EF41706 - EPA 5030C (GC)										
Blank (EF41706-BLK1)				Prepared	& Analyze	ed: 06/16/	04		<u> </u>	
Benzene	ND	0.0250	mg/kg wet							
Toluene	ND	0.0250	"							
Ethylbenzene	ND	0.0250	и							
Xylene (p/m)	ND	0.0250	n							
Xylene (o)	ND	0.0250	"							
Surrogate: a,a,a-Trifluorotoluene	86.7		ug/kg	100		86.7	80-120			
Surrogate: 4-Bromofluorobenzene	9 7.8		"	100		97.8	80-120			
LCS (EF41706-BS1)				Prepared	& Analyze	ed: 06/16/)4			
Benzene	101		ug/kg	100		101	80-120			
Toluene	97.5		"	100		97.5	80-120			
Ethylbenzene	94.2		97	100		94.2	80-120			
Xylene (p/m)	190		**	200		95.0	80-120			
Xylene (0)	99.4		"	100		99.4	80-120			
Surrogate: a,a,a-Trifluorotoluene	89.8		"	100		89.8	80-120			
Surrogate: 4-Bromofluorobenzene	106		"	100		106	80-120			
Calibration Check (EF41706-CCV1)				Prepared:	06/16/04	Analyzed	: 06/17/04			
Benzene	96.7		ug/kg	100		96.7	80-120			
Toluene	93.4		"	100		93.4	80-120			
Ethylbenzene	87.3		н	100		87.3	80-120			
Xylene (p/m)	175		u	200		87.5	80-120			
Xylene (o)	90.9		"	100		90.9	80-120			
Surrogate: a,a,a-Trifluorotoluene	96.4		"	100		96.4	80-120			
Surrogate: 4-Bromofluorobenzene	91.4		"	100		91.4	80-120			
Matrix Spike (EF41706-MS1)	So	urce: 4F1400	07-03	Prepared:	06/16/04	Analyzed	: 06/17/04			
Benzene	105		ug/kg	100	ND	105	80-120			
Toluene	101		"	100	ND	101	80-120			
Ethylbenzene	95.3		"	100	ND	95.3	80-120			
Xylene (p/m)	192		"	200	ND	96.0	80-120			
Xylene (o)	97.1		"	100	ND	97.1	80-120			
Surrogate: a,a,a-Trifluorotoluene	99.7		"	100		99 .7	80-120			
Surrogate: 4-Bromofluorobenzene	100		"	100		100	80-120			

Environmental Lab of Texas

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12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Page 6 of 9

Organics by GC - Quality Control Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
	Kesuit		Units		Result	/IIIIEC	Linits		Luin	140103
Batch EF41706 - EPA 5030C (GC)			-							
Matrix Spike Dup (EF41706-MSD1)	Sou	rce: 4F14007	-03	Prepared:	06/16/04	Analyzed	: 06/17/04			
Benzene	97.9		ug/kg	100	ND	97.9	80-120	7.00	20	
Toluene	94.2		"	100	ND	94.2	80-120	6.97	20	
Ethylbenzene	90.4		"	100	ND	90.4	80-120	5.28	20	
Xylene (p/m)	183		м	200	ND	91.5	80-120	4.80	20	
Xylene (0)	94.9		11	100	ND	94.9	80-120	2.29	20	
Surrogate: a,a,a-Trifluorotoluene	95.9			100		95.9	80-120			
Surrogate: 4-Bromofluorobenzene	103		"	100		103	80-120			

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Page 7 of 9

General Chemistry Parameters by EPA / Standard Methods - Quality Control

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EF41406 - General Prepar	ation (Prep)						•			
Blank (EF41406-BLK1)				Prepared	& Analyze	ed: 06/14/	04			
% Solids	0.0		%							
Duplicate (EF41406-DUP1)	Sou	urce: 4F1101	5-01	Prepared	& Analyza	ed: 06/14/	04			
% Solids	95.0		%		96.0			1.05	20	

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Highlander Environmental Corp. 1910 N. Big Spring St. Midland TX, 79705

Notes and Definitions

	DET	Analyte DETECTED
	ND	Analyte NOT DETECTED at or above the reporting limit
	NR	Not Reported
•	dry	Sample results reported on a dry weight basis
	RPD	Relative Percent Difference
	LCS	Laboratory Control Spike
	MS	Matrix Spike
ļ	Dup	Duplicate

alan dx the Report Approved By: Date: (e - 17 - 64)

Raland K. Tuttle, QA Officer Celey D. Keene, Lab Director, Org. Tech Director Jeanne Mc Murrey, Inorg. Tech Director

James L. Hawkins, Chemist/Geologist Sara Molina, Chemist Sandra Biezugbe, Lab Tech.

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Environmental Lab of Texas

12600 West I-20 East Odessa, Texas 79765	Phone: 432-563-1800 Fax: 432-563-1713										C	CHAI	N OF	CUS	STO	DY R	ECC	DRD .	AND	ANA	ALYS	sis f	REQU	est		
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6701 Aberdeen Avenue, Suite 9 4725 Ripley Avenue, Suite A

Lubbock, Texas 79424 800 • 378 • 1296 El Paso, Texas 79922 E-Mail: lab@traceanalysis.com

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FAX 806 • 794 • 1298 FAX 915•585•4944

Analytical and Quality Control Report

Ike Tavarez Highlander Environmental Services 1910 N. Big Spring St. Midland, TX 79705

Report Date: 1/12/00

Order ID Number: A00010810

Project Number: 1354 Project Name: Pogo/Lamunyon #44, Spill Area **Project Location:** Lea County, NM

Enclosed are the Analytical Results and Quality Control Data Reports for the following samples submitted to TraceAnalysis, Inc. for analysis:

Sample Number	Sample Description	Matrix	Date Taken	Time Taken	Date Received
138389	#1 Composite	Soil	1/5/00	10:30	1/8/00

These results represent only the samples received in the laboratory. The Quality Control Report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

This report consists of a total of 3 pages and shall not be reproduced except in its entirety, without written approval of TraceAnalysis, Inc.

Dr. Blair Leftwich, Director

Analytical Results Report

•	138389 #1 Composite							2	00	
Param	Flag	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
TPH DRO (mg/Kg) DRO		12400	5	Mod. 8015B	1/10/00	1/10/00	MA	PB00228	QC00298	50
TPH GRO (mg/Kg) GRO		1370	100	8015B	1/10/00	1/10/00	RC	PB00226	QC00294	0.1

	Qu	•	ntrol Repo d Blanks	rt		
Param	Flag	Blank Result	Reporting Limit	Date Analyzed	Prep Batch #	QC Batch #
DRO (mg/Kg)		<50	50	1/10/00	PB00228	QC00298
Param	Flag	Blank Result	Reporting Limit	Date Analyzed	Prep Batch #	QC Batch #
GRO (mg/Kg)	****	<5	0.1	1/10/00	PB00226	QC00294

Quality Control Report Matrix Spike and Matrix Duplicate Spike

Standard	Param	Sample Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
MS	DRO (mg/Kg)	<50	1	250	232	93		80 - 120	0 - 20	QC00298
MS	DRO (mg/Kg)	<50	1	250	232	93		70 - 130	0 - 20	QC00298
MSD	DRO (mg/Kg)	<50	1	250	243	97	5	80 - 120	0 - 20	QC00298
MSD	DRO (mg/Kg)	<50	1	250	243	97	5	70 - 130	0 - 20	QC00298

Quality Control Report Lab Control Spikes and Duplicate Spike

	Param	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCS	DRO (mg/Kg)	<50	1	250	221	88		80 - 120	0 - 20	QC00298
LCS	DRO (mg/Kg)	<50	1	250	221	88		70 - 130	0 - 20	QC00298
LCSD	DRO (mg/Kg)	<50	1	250	188	75	16	80 - 120	0 - 20	QC00298
LCSD	DRO (mg/Kg)	<50	1	250	188	75	16	70 - 130	0 - 20	QC00298
<u></u>	Param	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCS	GRO (mg/Kg)	<5	1	1	0.907	91		80 - 120	0 - 20	QC00294
LCSD	GRO (mg/Kg)	<5	1	1	0.919	92	1	80 - 120	0 - 20	QC00294

Quality Control Report Continuing Calibration Verification Standard

Standard	Param	Flag	CCVs TRUE Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	DRO (mg/Kg)		250	218	87	70 - 130	1/10/00	QC00298
CCV (1	DRO (mg/Kg)		250	246	98	70 - 130	1/10/00	QC00298
CCV (2	DRO (mg/Kg)		250	248	99	70 - 130	1/10/00	QC00298
~ • •	-		CCVs TRUE	CCVs Found	CCVs Percent	Percent Recovery	Date	QC Batch
Standard	Param	Flag	Conc.	Conc.	Recovery	Limits	Analyzed	#
ICV	GRO (mg/Kg)		1	1.17	117	80 - 120	1/10/00	QC00294
CCV (1	GRO (mg/Kg)		1	0.971	97	80 - 120	1/10/00	QC00294
CCV (2	GRO (mg/Kg)		1	1.04	104	80 - 120	1/10/00	QC00294

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Pogo Producing Company

	f Analysis Number: 2060443	
Report To:	Project Name:	#1354 Pogo/C.E. Lamunyon
Highlander Environmental Corp	Site:	Well#44 Lea Co.,NM
lke Tavarez	Site Address:	
1910 N. Big Spring Street		
Midland	PO Number:	
TX	State:	New Mexico
79705-	State Cert. No .:	
ph: (915) 682-4559 fax: (915) 682-3946	Date Reported:	6/24/2002

This Report Contains A Total Of 8 Pages

Excluding This Page

And

Chain Of Custody

6/24/2002



HOUSTON LABORATORY 8880 INTERCHANGE DRIVE HOUSTON, TX 77054 (713) 660-0901

Case Narrative for: Pogo Producing Company

Certificate of Analysis Number:

02060443

Report To:	Project Name: #1354 Pogo/C.E. Lamunyon
Highlander Environmental Corp	Site: Well#44 Lea Co.,NM
lke Tavarez	Site Address:
1910 N. Big Spring Street	
Midland	PO Number:
TX	State: New Mexico
79705-	State Cert. No.:
ph: (915) 682-4559 fax: (915) 682-3946	Date Reported: 6/24/2002

Matrix spike (MS) and matrix spike duplicate (MSD) samples are chosen and tested at random from an analytical batch of "like" matrix to check for possible matrix effect. The MS and MSD will provide site specific matrix data only for those samples which are spiked by the laboratory. Since the MS and MSD are chosen at random from an analytical batch, the sample chosen for spike purposes may or may not have been a sample submitted in this sample delivery group. The validity of the analytical procedures for which data is reported in this analytical report is determined by the Laboratory Control Sample (LCS) and the Method Blank (MB). The Laboratory Control Sample (LCS) and the Method Blank (MB) are processed with the samples and the MS/MSD to ensure method criteria are achieved throughout the entire analytical process.

Any other exceptions associated with this report will be footnoted in the analytical result page(s) or the quality control summary page(s).

Please do not hesitate to contact us if you have any questions or comments pertaining to this data report. Please reference the above Certificate of Analysis Number.

This report shall not be reproduced except in full, without the written approval of the laboratory. The reported results are only representative of the samples submitted for testing.

SPL, Inc. is pleased to be of service to you. We anticipate working with you in fulfilling all your current and future analytical needs.

Blankfield rolect Manager

6/24/2002



HOUSTON LABORATORY 8880 INTERCHANGE DRIVE HOUSTON, TX 77054 (713) 660-0901

Pogo Producing Company

		c	ertificate o	of Analysis	Numbe	r:			
			<u>0</u>	2060443					
<u>Report To:</u>	Highlander Enviror Ike Tavarez 1910 N. Big Spring				Site:	<u>t Name:</u> Idress:	#1354 Pogo/0 Well#44 Lea 0	C.E. Lamunyon Co.,NM	
Fax To:	Midland TX 79705- ph: (915) 682-4559 Highlander Environ	mental Corp			· · · ·	mber: Cert. No.: eported:	New Mexico 6/24/2002		
Clien	Ike Tavarez	tax : (915)	682-3946 Matrix	Date Co	lected	Date	Received	COC ID	HOLD
Composite(0-1'	<u> </u>	02060443-01	Soil	6/10/2	002	6/13/200	2 10:00:00 AM		

7<u>a</u> Johi Blankfield oject Manager

6/24/2002

Date

Joel Grice Laboratory Director

Ted Yen Quality Assurance Officer



HOUSTON LABORATORY

8880 INTERCHANGE DRIVE

HOUSTON, TX 77054 (713) 660-0901

Client Sample ID Co	mposite(0-1')			Colle	cted: (06/10/2002	0:00	SPL Sample I	D: 020	60443-01
				Site:	We	ll#44 Lea C	o.,NM			
Analyses/Method	<u> </u>	Result		Rep.Limit		Dil. Factor	QUAL	Date Analyzed	Analyst	Seq. #
DIESEL RANGE OR	GANICS				MCL	SW	B015B	Units: m	g/Kg	
Diesel Range Organic	s	1800		100		20		06/19/02 15:46	AR	1188101
Surr: n-Pentacosan	e	D	%	20-154		20	*	06/19/02 15:46	AR	1188101
Prep Method	Prep Date			Prep Initials						
SW3550B	06/18/2002 1	0:59		НН						
GASOLINE RANGE	ORGANICS				MCL	SW	3015B	Units: m	g/Kg	
Gasoline Range Organ	nics	ND		0.10		1		06/20/02 17:21	ТМ	1188557
Surr: 1,4-Difluorobe	nzene	103	%	63-122		1		06/20/02 17:21	TM	1188557
Surr: 4-Bromofluoro	benzene	100	%	39-150		1		06/20/02 17:21	ТМ	1188557

Qualifiers:

ND/U - Not Detected at the Reporting Limit

- B Analyte detected in the associated Method Blank
- * Surrogate Recovery Outside Advisable QC Limits

J - Estimated Value between MDL and PQL

>MCL - Result Over Maximum Contamination Limit(MCL)
 D - Surrogate Recovery Unreportable due to Dilution
 MI - Matrix Interference

Quality Control Documentation

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HOUSTON LABORATORY 8880 INTERCHANGE DRIVE HOUSTON, TX 77054 (713) 660-0901

Quality Control Report

Pogo Producing Company

#1354 Pogo/C.E. Lamunyon

Analysis: Method:	Diesel Range Orga SW8015B	anics						WorkOrder Lab Batch		060443 664 A	3	
	Me	thod Blank			· · · · · · · · · · · · · · · · · · ·	Samples	s in Analytica	al Batch:				
RunID:	HP_V_020619D-1188	109 Units:	mg/K	g		Lab San	nple ID	Clier	nt Sample I	D		
Analysis Date:	06/19/2002 17:42	Analyst:	AR			0206044		Com	posite(0-1')	-		
Preparation Date:	06/18/2002 10:59	Prep By:	нн	Method SW	3550B							
	Analyte		Result	Rep Limit								
Diese	Range Organics		N									
Su	r: n-Pentacosane		87.	7 20-154								
			L	aboratory C	ontrol Sam	ole (LCS)					
	Runl	D:	HP_V_0	20619D-11881	08 Units:	mg/ł	<g< td=""><td></td><td></td><td></td><td></td><td></td></g<>					
	Analy	/sis Date:	06/19/2	002 17:03	Analys	: AR						
	Prep	aration Date:	06/18/2	002 10:59	Prep B	y: HH	Method SW	3550B				
	[Analy	e		Spike Re	sult F	Percent Lo	wer Uppe	er			
		-			Added		ecovery L	imit Limi				
	Diesel I	Range Organic	s		83	66	80	50 1	150			
		Matrix	Spike (I	MS) / Matrix	Spike Dupl	cate (M	SD)	· <u></u>	<u></u>		<u></u>	
	Sar	nple Spiked:	02060)464-05								
		nID:	HP_V_	_020619D-118	8106 Units	: mg	/Kg-dry					
	Ana	lysis Date:	06/19/	/2002 12:31	Analy							
	Pre	paration Date:	06/18/	/2002 10:59	Prep	By: HH	Method St	W3550B				
		Comole	MO	MC	MAC 0/	MOD	MOD	MOD N	000	000		1.1.1
Ar	alyte	Sample Result	MS Spike Added	MS Result	MS % Recovery	MSD Spike Added	MSD Result	MSD % Recovery	RPD	RPD Limit	Low Limit	High Limit
Diesel Range Orga	inics	ND	103	86	6 81.1	103	74	69.2	15.8	50	21	175
		•				h	·	<u>د</u>			ł	L

Qualifiers:

ND/U - Not Detected at the Reporting Limit

MI - Matrix Interference

B - Analyte detected in the associated Method Blank

D - Recovery Unreportable due to Dilution

J - Estimated value between MDL and PQL

* - Recovery Outside Advisable QC Limits

The percent recoveries for QC samples are correct as reported. Due to significant figures and rounding, the reported RPD may differ from the displayed RPD values but is correct as reported.



HOUSTON LABORATORY 8880 INTERCHANGE DRIVE HOUSTON, TX 77054 (713) 660-0901

Quality Control Report

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Pogo Producing Company

#1354 Pogo/C.E. Lamunyon

					#1354 Po	0	•							
Analysis: Method:	Gasoline Ran SW8015B	ige Orgar	nics	·						(Order: Batch ID:		060443 1748	;	
		Method	Blank				Samp	es in Analy	tical Batc	h:	····			
RunID:	HP_O_020620B	-1188554	Units:	mg/Kg			Lab Sa	ample ID		<u>Client S</u>	Sample I	D		
Analysis Date:	06/20/2002 3:2	22	Analyst:	ТМ				443-01A		Compos		-		
	Analy	vte		Result	Rep Limit	1								
	soline Range Organic	cs		ND	0.10									
	Surr: 1,4-Difluorobenz Surr: 4-Bromofluorobe			<u>98.0</u> 95.7										
				La	boratory (Control Sam	ple (LC	<u>(S)</u>						
		RunID:		HP_O_02	0620B-1188	551 Units:	m	g/Kg						
		Analysis I	Date:	06/20/20	02 1:53	Analys	t: TN	1						
											1			
			Analyt	e		Spike Re Added	sult	Percent Recovery	Lower Limit	Upper Limit				
	Ga	asoline Ra						Recovery	Limit	Limit				
	Ga	asoline Ra	Analyt Inge Orgar			Added	esult 1.2].			
	Ga	asoline Ra	inge Orgar	nics		Added 1	1.2	Recovery 116	Limit	Limit				
	Ga	asoline Ra	inge Orgar	nics		Added	1.2	Recovery 116	Limit	Limit				
	Ga	asoline Ra Sample	inge Orgar <u>Matrix</u>	nics	IS) / Matrix	Added 1	1.2	Recovery 116	Limit	Limit				
	Ga		inge Orgar <u>Matrix</u>	nics Spike (M 020605	IS) / Matrix	Added 1 C Spike Dupl	1.2 icate (Recovery 116	Limit	Limit			,	
	Ga	Sample	<u>Matrix</u> Spiked:	nics Spike (M 020605 HP_O_C	I <mark>S) / Matri</mark> 555-12	Added 1 C Spike Dupl	1.2 icate (Recovery 116 MSD)	Limit	Limit			,	
	Ga	Sample RunID:	<u>Matrix</u> Spiked:	nics Spike (M 020605 HP_O_C	I <mark>S) / Matri</mark> z 555-12 020620B-118	Added 1 Spike Dup 38552 Units	1.2 icate (Recovery 116 MSD) ng/Kg	Limit	Limit),			
		Sample RunID: Analysis	Matrix Matrix Spiked: s Date:	nics Spike (M 020605 HP_O_C 06/20/2	IS) / Matrix 555-12 020620B-111 2002 2:22	Added 1 38552 Units Analy	1.2 icate (: r /st: 7	Recovery 116 MSD) ng/Kg M	Limit 70	Limit 130				
	Ga	Sample RunID: Analysis	<u>Matrix</u> Spiked:	nics Spike (M 020605 HP_O_C 06/20/2 MS	I <mark>S) / Matri</mark> z 555-12 020620B-118	Added 1 38552 Units Analy MS %	1.2 icate (: r yst: 1	Recovery 116 MSD) ng/Kg M	Limit 70	Limit 130	RPD	RPD Limit	Low Limit	High Limit
		Sample RunID: Analysis	Matrix Matrix Spiked: Date: Sample	nics Spike (M 020605 HP_O_C 06/20/2	IS) / Matriz 555-12 020620B-111 2002 2:22 MS	Added 1 38552 Units Analy	1.2 icate (: r /st: 7	Recovery 116 MSD) ng/Kg M MSD MSD Result	Limit 70	Limit 130		RPD Limit		High Limit

Qualifiers:

ND/U - Not Detected at the Reporting Limit

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The percent recoveries for QC samples are correct as reported. Due to significant figures and rounding, the reported RPD may differ from the displayed RPD values but is correct as reported.

Sample Receipt Checklist And Chain of Custody

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HOUSTON LABORATORY 8880 INTERCHANGE DRIVE HOUSTON, TX 77054 (713) 660-0901

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Sample Receipt Checklist

Wo	orkorder:	02060443		Receive	ed By: I	NB	
Da	te and Time Received:	6/13/2002 10:00:00 AM		Carrier	name: F	FedEx	
Tei	mperature:	4		Chilled	by: ۱	Water Ice	
1.	Shipping container/co	poler in good condition?	Yes 🗹	No	Not Preser	nt 🗌	
2.	Custody seals intact of	on shippping container/cooler?	Yes 🗌	No 🗌	Not Preser	nt 🗹	
3.	Custody seals intact of	on sample bottles?	Yes 🗌	No 🗌	Not Preser	nt 🗹	
4.	Chain of custody pres	sent?	Yes 🗹	No 🗌			
5.	Chain of custody sign	ned when relinquished and received?	Yes 🗹	No 🗌			
6.	Chain of custody agre	ees with sample labels?	Yes 🗹	No 🗌			
7.	Samples in proper co	ntainer/bottle?	Yes 🗹	No 🗌			
8.	Sample containers int	tact?	Yes 🗹	No 🗌			
9.	Sufficient sample volu	ume for indicated test?	Yes 🗹	No 🗌			
10.	All samples received	within holding time?	Yes 🗹	No 🗔			
11.	Container/Temp Blan	k temperature in compliance?	Yes 🗹	No 🗌			
12.	Water - VOA vials hav	e zero headspace?	Yes	No 🗌	Not Applica	able 🔽	
13.	Water - pH acceptable	e upon receipt?	Yes 🗌	No 🗌	Not Applica	able 🗹	

SPL Represent	ative:	Contact Date & Time:	
Client Name Conta	acted:		
Non Conformance Issues: Client Instructions:	·		

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PROJECT			PR	roj, P O	ECT		É: C	SITE . E We	i. 1	La	m		1 >	101	1				CONTAI			T					808	8		A 40	A6 A6	8	Volatiles		88/01/88	Vol. B2	608	8	H. 1708,	đ	(Aitr)	(90)			
LAB I.D. NUMBER	DATE	TIME	MATRIX	CUMP.	GKAB				:/ MPL1							60).	IVM	NUMBER OF			HCL	HN03	ICE	NONE		BTECK 8020/602	MTBB 8020/	1811	BCRA Metals	TCLP Metals Ag As Ba Cd Cr Pd Hg	PCLP Volati	TCLP Sami Volatiles	RC	GC.MS Vol. 8240/8260/824	GC.MS Semi	PCB's 8080/	Peet. 808/808	BOD, 733, p	Gamma Spec.	Alpha Beta	PLM (Asbestos)		i C	
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Please Fill out all copies - Laboratory retains yellow copy - Return original copy to Highlander Environmental Corp. - Project Manager retains pink copy - Accounting receives Gold-copy.