

Nevada
Environmental
Restoration
Project

DOE/NV--1035



Gasbuggy Surface Closure Report for the Gasbuggy Site, New Mexico

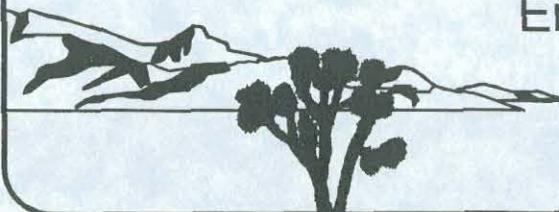
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Nevada Site Office

GASBUGGY SURFACE CLOSURE REPORT FOR THE GASBUGGY SITE, NEW MEXICO

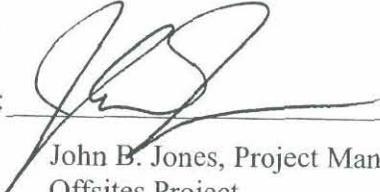
U.S. Department of Energy
National Nuclear Security Administration
Nevada Site Office
Las Vegas, Nevada

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September 2005

**GASBUGGY SURFACE CLOSURE REPORT
FOR THE GASBUGGY SITE, NEW MEXICO**

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Acronyms and Abbreviations

bgs	Below ground surface
CAIR/CAP	Corrective Action Investigation Report/corrective action plan
CAP	Corrective Action Plan
CR	Closure Report
DOE	Department of Energy
EPA	Environmental Protection Agency
ft	Feet
GRO	Gasoline range-organics
mg/kg	Milligrams per kilograms
NMED	New Mexico Environment Department
NNSA/NSO	U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office
OCD	Oil Conservation Division
PPE	Personal Protective Equipment
RCRA	<i>Resource Conservation and Recovery Act</i>
SGZ	Surface Ground Zero
SWPPP	Storm water pollution prevention plan
TPH	Total petroleum hydrocarbons
VRP	Voluntary Remediation Program

1.0 Introduction

This Closure Report (CR), which includes the Mud Pit As-Built Report as Attachment A, provides documentation for the closure of the surface area of the Gasbuggy Site in New Mexico by the U.S. Department of Energy (DOE), National Nuclear Security Administration Nevada Site Office (NNSA/NSO). For the purposes of this document, the Gasbuggy Site surface is defined as the surface soils and shallow subsurface soils (to 30 feet [ft] below ground surface [bgs]) that may have been impacted as a result of surface activities conducted during the Gasbuggy Project or surface and shallow subsurface soil that may have been impacted as a result of a release from the deep subsurface. This definition intentionally excludes contamination in the deep subsurface resulting from the Project Gasbuggy nuclear detonation.

Project Gasbuggy was the first of three joint government-industry experiments conducted under the Plowshare Program to test the effectiveness of nuclear explosives to fracture low-permeability natural gas reservoirs to stimulate production. Gasbuggy consisted of one 29-kiloton nuclear device (DOE/NV, 2000) emplaced in a boring at a depth of 4,240 ft bgs in the Pictured Cliffs sandstone formation and detonated on December 10, 1967 (AEC, 1971). The Gasbuggy Site is located approximately 55 air miles east of Farmington, New Mexico in Rio Arriba County within the Carson National Forest. Six major natural gas production tests were conducted after reentry drilling was completed in January 1968. Long-term production testing was completed in November 1973 and pressure monitoring activities were completed in late 1976 (DOE/NV, 1978).

Closure of the surface is based upon the successful completion of the actions identified in the Surface Corrective Action Investigation Report/Corrective Action Plan (CAIR/CAP) for the Gasbuggy Site, New Mexico (NNSA/NV, 2004). The CAIR/CAP was reviewed and commented on by the New Mexico Environment Department (NMED) with the work being accomplished under the auspices of the New Mexico Oil Conservation Division (OCD). Details of the actions performed are included in Attachment A.

1.1 Purpose

The purpose of this CR is to:

- Provide the information collected during the activities as proposed in the CAIR/CAP (NNSA/NSO, 2004).
- Provide documentation of the completion of remediation activities for entry into the NMED Voluntary Remediation Program (VRP).

1.2 Scope

The following remedial actions were completed for the closure of the Gasbuggy surface area and are presented in detail in Attachment A, Mud Pit As-Built Report:

- Excavation and removal of impacted materials from the three mud pits at Surface Ground Zero (SGZ) and the single mud pit associated with Well GB-D that exceeded the 100 milligrams per kilograms (mg/kg) total petroleum hydrocarbons (TPH) action level.
- Transported and disposed of the excavated TPH impacted materials at the Envirotech OCD permitted landfarm in Bloomfield, New Mexico.
- Conducted confirmatory sampling of the excavation bottoms and walls to confirm TPH concentrations were below the 100 mg/kg action level.
- Backfilled and regarded (to near original topography) the SGZ and Well GB-D areas (using certified clean fill).

1.3 Closure Report Contents

Section 1 - Introduction: Purpose, scope, closure report contents

Section 2 - Closure Activities: Description of closure activities, deviations from corrective action plan, corrective action schedule, site survey

Section 3 - Waste Disposition: Waste management activities, waste disposal

Section 4 - Closure Verification Results: Confirmatory sampling

Section 5 - Conclusions and Recommendations

Section 6 - References

2.0 Closure Activities

This identifies the specific activities involved in the remediation and closure of the Gasbuggy Site surface area including site investigation, characterization, and remediation. This section also includes any deviations from the corrective action plan as well as the post remediation site configuration.

2.1 Description of Closure Activities

The final closure/remediation requirements for the Gasbuggy Site were identified in the CAIR/CAP (DOE/NV, 2004) which was developed based on results of investigation activities conducted by the NNSA/NSO from August to September 2000, and July through October 2002. The CAIR/CAP (DOE/NV, 2004) identified TPH as the only contaminant of concern (COC) in excess of the negotiated level of 100 mg/kg. The remediation actions for the removal of the TPH-contaminated soils were successfully executed from August 2, 2004, through September 10, 2004. The results of this activity are detailed in Attachment A.

2.2 Deviations from Corrective Action Plan

There were no fundamental deviations from the original Corrective Action Plan (CAP). Changes were primarily schedule related with minor adjustments related to changing field conditions. The schedule change was a shift from performance in the spring of 2004 to the late summer of 2004; this schedule change was driven by delays involving the negotiations associated with entering the Gasbuggy Site into the VRP. Remediation activities were originally to be performed under the VRP program but ultimately were performed under the guidance of the OCD. Further discussion of the regulatory requirements is in Section 2.1, Regulatory History, of Attachment A.

Minor alterations to the original CAP work strategy were required to meet changing field conditions, these changes included altered pit excavation dimensions due to “chasing” of impacted soils, relocation of confirmatory sampling locations based on expanded excavations, and changes in the site layout to meet the requirements contained in the Storm Water Pollution Prevention Plan (SWPPP), Mud Pit Closure, Gasbuggy Site, Rio Arriba County, New Mexico (INTERA, 2004). Details of these changes are discussed in Attachment A.

2.3 Corrective Action Schedule

The Gasbuggy Site surface remediation, which consisted of the excavation and disposal of TPH contaminated soil, took place from August 2, 2004, through September 10, 2004. Details of the corrective action are presented in Section 3 of Attachment A. The following is a summary of these activities:

- August 2 to 9 Site Mobilization, road preparation, fencing and runoff controls installed.
- August 9 to 16 Overburden removal, internal road construction.
- August 16 to September 3 Soil excavation and shipment, confirmatory sampling, backfill of excavations.
- September 3 to 10 Site contouring, reseeding, demobilization.

2.4 Site Plan and Survey

A site plan reflecting the closure activity addressed in this report is provided in Section 3.4 and Appendix B of Attachment A to this report. Daggett Enterprises, a New Mexico licensed surveying company, visited the site several times during both the characterization and remediation activities to gather data for inclusion in the CAIR/CAP (DOE/NV, 2004) and the attached Mud Pit As-Built Report (Attachment A). The data portrayed in Attachment A accurately reflects the corrective actions taken as well as end state of the Gasbuggy Site.

3.0 Waste Disposition

All wastes associated with the site remediation were treated as *Resource Conservation and Recovery Act* (RCRA) exempt oil-field waste and regulated as such under the auspices of the New Mexico OCD.

3.1 Waste Management Activities

All remediation related waste transportation and disposal, including excavated material, personal protective equipment (PPE) and decontamination equipment were disposed of by Envirotech Inc. Envirotech is a New Mexico OCD-approved transportation and disposal provider for RCRA exempt oil field waste. Envirotech was also audited and approved for NNSA/NSO use by the Stoller-Navarro Joint Venture in the summer of 2003 with follow-up audits in May and August of 2004. Transportation was conducted by Envirotech using their authorized trucking subcontractors.

3.2 Waste Disposal

Excavation activities from the four mud pits resulted in the transportation and disposal of 5,562 cubic yards of TPH-contaminated material to include soil, broken cement, and tree stumps. All excavated materials were disposed of in the OCD approved Envirotech Landfarm #2. Due to the dry conditions, only a small bag (less than 2 cubic ft), of PPE and no decontamination equipment were sent to Envirotech for disposal. Details on waste disposal quantities and methods are provided in Section 3.2.4 of Attachment A.

4.0 Closure Verification Results

Confirmatory sampling was conducted for each of the mud pits after excavation was completed to the point where physical detection methods of sight and smell indicated that the boundaries of contamination had been reached. A second series of samples were taken after the excavation of hot spots identified during the initial round of sampling.

The initial excavation boundaries of each mud pit were established and marked by Daggett in accordance with the data provided in the CAP. Final excavation boundaries and sampling points were determined based on laboratory results and are documented in detail in Section 3 of Attachment A.

4.1 Confirmatory Sampling

Field and confirmatory samples were taken to verify that the full extent of TPH-contaminated soils had been removed. The field samples were processed locally by Envirotech to provide quick turn around prior to moving excavation equipment from one mud pit to another. Confirmatory samples were processed by the DOE-approved laboratory in Colorado. Results from the confirmatory sampling were used as the final decision basis that mud pit excavations were complete and backfilling could begin. Confirmatory and field samples were collected from the same locations at the same time. The locations, two from each side wall and three from each pit bottom, roughly followed the designated points identified in the CAIR/CAP. The difference in locations was the result of excavating mud pits beyond the original plan boundaries based on both sample results as well as physical identification of the extent of contaminated soil. Details of the sampling locations and methods as well as drawings identifying the locations are included in Attachment A.

5.0 Conclusions and Recommendations

5.1 Conclusions

The successful removal of 5,562 cubic yards of TPH-contaminated materials from the SGZ and Well GB-D areas, along with the associated restoration activities, fulfills the requirements of the reviewed and approved CAIR/CAP (DOE/NV, 2004). This action constitutes the completion of the final step in remediating the surface and shallow subsurface areas associated with the Gasbuggy Project. No further actions associated with the surface and shallow subsurface are required at the Gasbuggy Site.

5.2 Recommendations

Based on the conclusions identified in the CAIR/CAP (DOE/NV, 2004), the successful completion of the identified corrective actions as documented in this Closure Report and the goal of NNSA/NSO to clean close the Gasbuggy Site surface in accordance with the New Mexico VRP (NMED, 1999), the following recommendations are made:

- NNSA/NSO will complete the application for admission of the site into the New Mexico VRP.
- Once accepted into the VRP, NNSA/NSO will work with the New Mexico VRP to complete all required public participation activities.
- Based on the conclusions in Section 5.1, NNSA/NSO recommends that no further corrective actions be required for the Gasbuggy Site surface and shallow subsurface.
- Based on the conclusions in Section 5.1, NNSA/NSO recommends that no use restrictions be placed on the surface for the Gasbuggy Site.
- Once all NMED comments on this report are addressed and all VRP-required documentation filed, the NNSA/NSO will request a certificate of completion for the Gasbuggy Site.

6.0 References

AEC, see U.S. Atomic Energy Commission.

DOE/NV, see U.S. Department of Energy, Nevada Operations Office.

INTERA, Inc. 2004. *Stormwater Pollution Prevention Plan, Mud Pit Closure, Gasbuggy Site, Rio Arriba County, New Mexico*. Prepared for the U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office, Albuquerque, NM.

NNSA/NSO, see U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office.

U.S. Atomic Energy Commission. 1971. *Project Gasbuggy Manager's Report*, PNE-G-79, NVO-37. Las Vegas, NV.

U.S. Department of Energy, Nevada Operations Office, 1978. *Project Gasbuggy Well Plugging and Site Restoration Plan*, NVO-195 Las Vegas, NV.

U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office, Environmental Restoration Division, April 2004. *Surface Corrective Action Investigation Report with Surface Corrective Action Plan for the Gasbuggy Site, New Mexico*, DOE/NV report DOE/NV-908, Las Vegas, NV.

U.S. Department of Energy, Nevada Operations Office. 2000. *United States Nuclear Tests, July 1945 through September 1992*. Rev. 15, DOE/NV--209. Las Vegas, NV.

Attachment A Mud Pit As-Built Report

Prepared by INTERA
for
Stoller-Navarro Joint Venture

MUD PIT AS-BUILT REPORT

GASBUGGY SITE, RIO ARRIBA COUNTY, NEW MEXICO

Stoller – Navarro Joint Venture
7710 West Cheyenne Avenue
Las Vegas, Nevada 89129

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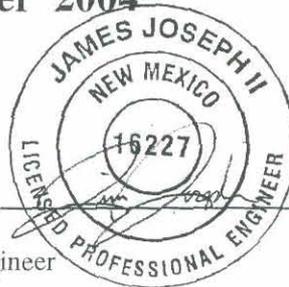
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ACRONYMS AND ABBREVIATIONS

BMP	best management practice
C	carbon
CAP	corrective action plan
CFR	Code of Federal Regulations
CGP	Construction General Permit NMR 150000
Daggett	Daggett Enterprises, Inc.
DOE	Department of Energy
DQO	Data Quality Objective
DRO	diesel range organics
DS	decontamination station
Envirotech	Envirotech, Inc.
EPA	Environmental Protection Agency
EPNG	El Paso Field Services
FI	field instructions
FS 357	USFS Road 357
GRO	gasoline range organics
HWB	Hazardous Waste Bureau
INTERA	INTERA Inc.
lbs/acre	pounds per acre
mg/kg	milligrams per kilograms
ND	no detection
NMED	New Mexico Environment Department

ACRONYMS AND ABBREVIATIONS (Continued)

NNSA	National Nuclear Security Administration
NOI	Notice of Intent
NPDES	Storm Water Pollution Discharge Elimination Systems
NSO	Nevada Site Office
OCD	Oil Conservation Division
One Call	New Mexico One Call
PE	project engineer
PLS	pure live seed
RA	remediation area
SGZ	Surface Ground Zero
SNJV	Stoller-Navarro Joint Venture
SQP	standard quality practice
SS	site supervisor
SSHASP	site-specific health and safety plan
SWPPP	storm water pollution prevention plan
SZ	support zone
TPH	total petroleum hydrocarbons
U.S.	United States
USFS	U.S. Department of Agriculture Forest Service
VRP	Voluntary Remediation Program

Executive Summary

This report presents a summary of the corrective action activities conducted at the Gasbuggy Site (Corrective Action Unit 1024) by the United States (U.S.) Department of Energy (DOE), National Nuclear Security Administration (NNSA) Nevada Site Office (NSO) and the Stoller-Navarro Joint Venture (SNJV). The Gasbuggy Site is located approximately 55 air miles east of Farmington, New Mexico, in Rio Arriba County within the Carson National Forest. Project Gasbuggy was a joint government-industry experiment, conducted under the Plowshare Program, to test the effectiveness of nuclear explosives to fracture low-permeability natural gas reservoirs to stimulate production. The test was conducted with a 29-kiloton nuclear device emplaced 4,240 feet below ground surface in a boring in the Pictured Cliffs Sandstone Formation and detonated on December 10, 1967 (DOE/NV, 2004).

Drilling operations conducted prior to the test included the construction and use of multiple mud pits at the Gasbuggy Site. The practice of mixing of diesel fuel with the drilling fluids was implemented at several of the test wells, resulting in the placement of petroleum-contaminated mud in pits that were eventually buried in place. Gasbuggy Site corrective action activities, which are the subject of this report, focused on soil contamination within the shallow subsurface; defined as the unsaturated drilling mud/soil within 30 feet of the ground surface. Contaminated material was identified and delineated during site characterization activities conducted in 2000 and 2002.

Recommendations from the previous site characterization activities included corrective action to achieve clean closure by the removal of contaminated drilling mud/soil from the shallow subsurface. The corrective action was driven by a New Mexico Oil Conservation Division (OCD) cleanup level of 100 milligrams per kilograms (mg/kg) of total petroleum hydrocarbons (TPH). Drilling mud/soil identified as containing concentrations of TPH greater than the cleanup level were identified in three mud pits at surface ground zero (SGZ) and one mud pit at the Well GB-D area.

The purpose of this as-built report is to document the corrective action activities conducted in August and September 2004. These activities included mobilization and setup, mud pit excavation, disposal of contaminated material, backfill of excavated pits, reseeding the disturbed areas, and completion of an as-built site survey. Corrective action activities were completed in accordance with applicable regulations, guidance documents, orders, and site-specific documents. Work was conducted by the SNJV under the direct supervision of the DOE project engineer (DOE-PE).

Mobilization and set up included mobilization of materials, personnel, and equipment and construction of temporary site features designed to support the corrective action activities. Special care was taken to protect features at the site that are remnants of Project Gasbuggy (e.g., pipe rack, concrete slabs, monuments, and well-head markers [previously abandoned wells]).

Excavation activities included the removal of topsoil, overburden (temporarily stockpiled on site), and contaminated materials from the pits. Topsoil and overburden were stockpiled onsite and used later in the project for backfill material. Approximately 5,562 cubic yards of contaminated material (drilling mud, soil, cement/bentonite, and debris) were excavated from Well GB-E Mud Pits A, D, and E, and the Well GB-D Mud Pit. The contaminated material was removed from the pits until laboratory analytical results from soil samples collected from the pit walls confirmed that all contaminated material containing concentrations greater than the cleanup level had been removed. Contaminated material was loaded directly from the pits into trucks and transported offsite to a landfarm operated by Envirotech, Inc.

Once laboratory analytical results were received that confirmed the complete removal of contaminated drilling mud/soil, the pits were backfilled to grade with original overburden material and imported backfill. To reduce the amount of surface recontouring required to establish natural-appearing site topography, approximately 3,420 cubic yards of imported clean fill were delivered to be used as backfill in the pits. The imported clean fill was mixed with overburden prior to using as backfill.

Site restoration included replacement of topsoil, reseeding disturbed areas with a United States Forest Service-approved seed mixture, removal of temporary structures and facilities, and performing a final as-built survey. SNJV made permanent improvements to the site by decommissioning a primitive campsite, ripping and reseeding the unmaintained road between SGZ and the Well GB-D area, and constructing a parking area at SGZ to facilitate existing and planned interpretive facilities associated with Project Gasbuggy. A final topographic survey that included significant site features was completed by a New Mexico professional surveyor. The survey data was used to develop the as-built drawings.

This successful completion of corrective action facilitates future clean closure of the site surface under the New Mexico Voluntary Remediation Program.

1.0 *Introduction*

This report presents a summary of the corrective action activities conducted at Corrective Action Unit 1024, the Gasbuggy Site (Site), between August 2 and September 10, 2004. The work was performed by the United States (U.S.) Department of Energy (DOE), National Nuclear Security Administration (NNSA) Nevada Site Office (NSO) (referred to in reference citations as DOE/NV) and the Stoller-Navarro Joint Venture (SNJV). Corrective action included removal of shallow subsurface soil contaminated by petroleum hydrocarbons. The corrective action was driven by a New Mexico Oil Conservation Division (OCD) cleanup level of 100 milligrams per kilograms (mg/kg) of total petroleum hydrocarbons (TPH). Soil identified as containing concentrations of TPH greater than the cleanup level were excavated and transported offsite to an approved landfarm.

The Site is located approximately 55 air miles east of Farmington, New Mexico, in Rio Arriba County within the Carson National Forest. Project Gasbuggy was a government–industry experiment conducted under the Plowshare Program to test the effectiveness of nuclear explosives to fracture low-permeability natural gas reservoirs in order to stimulate production. Project Gasbuggy consisted of one 29-kiloton nuclear device emplaced in a boring at a depth of 4,240 feet below the ground surface in the Pictured Cliffs Sandstone Formation and detonated on December 10, 1967. Six major natural gas production tests were conducted after reentry drilling was completed in January 1968. Long-term production testing was completed in November 1973, and pressure monitoring activities were completed in late 1976 (DOE/NV, 2004).

The contaminated soils removed during this corrective action resulted from drilling operations conducted prior to the test and were restricted to the mud pits which were designed and built to contain the drilling fluids (DOE/NV/Office of Public Affairs [OPA], 2004). Four mud pits were identified as containing TPH-contaminated soil during previous site characterization activities conducted during 2000 and 2002 (DOE/NV, 2004). The corrective action activities provided as the subject to this report were limited to these four pits.

1.1 Purpose and Content

The purpose of this report is to document the activities and to provide data resulting from the corrective action at the Site. This report includes the following information:

- references to project documents and project organization
- background information regarding prior site work
- description of site set up and mobilization activities
- summary of excavation and backfill activities
- analytical data results from soil sampling
- quantities and locations of excavated soil
- description of the as-built condition of the Site

1.2 Scope

The scope of this report is the corrective action taken for the Site shallow subsurface. The shallow subsurface is defined here as the unsaturated soil within 30 feet of the ground surface that was impacted during activities leading up to the nuclear test. The scope of this corrective action includes only that portion of the Site and subsurface that was specifically addressed in the report entitled *Surface Corrective Action Investigation Report with Surface Corrective Action Plan for the Gasbuggy Site, New Mexico* (DOE/NV, 2004).

1.3 Project Authority

The corrective action work completed at the Site was accomplished in agreement with established regulations, written protocols, and project-specific documents. Project-specific documents (including plans, specifications, permits, and drawings) were prepared in conjunction with prior site characterization work and during the design/planning phase of the project. Their preparation was in accordance with applicable regulations and orders, and under the direction and/or regulatory authority of several government entities. The work was conducted under the management of the Environmental Restoration Division of the DOE NNSA/NSO.

In addition to internal DOE review, the corrective action project documents were provided for review and comment to the following entities (as deemed applicable based on the nature of the document[s]):

- New Mexico Oil Conservation Division (OCD)
- U.S. Department of Agriculture Forest Service (USFS)
- U.S. Environmental Protection Agency (EPA)
- New Mexico Environment Department (NMED)
- Jicarilla Apache Nation

1.3.1 Regulatory Authority

Based on the results of the site characterization work conducted in 2000 and 2002, a corrective action objective of clean closure was recommended to remove contaminated drilling mud and soil from the Site. The DOE NNSA/NSO proceeded with plans to remove the contaminated material allowing closure of the Site under the NMED Voluntary Remediation Program (VRP) (DOE/NV, 2004). In the spring of 2004 the DOE submitted an "Application for Determination of Eligibility" to the NMED VRP in which the USFS was listed as the current property owner. As the project start date approached, challenges in the negotiation of the final closure status developed between the interested parties. Corrective action work was completed prior to settling these issues, and at the date of this report, negotiations are continuing. In the interim, cleanup was performed in accordance with the regulations and standards established by the OCD.

1.3.1.1 New Mexico Oil Conservation Division

Because the petroleum hydrocarbon contaminated drilling mud/soil was classified as oil and gas exploration/production waste, the Site remediation was performed under the requirements established by the OCD. The cleanup level of 100 mg/kg of TPH in the shallow subsurface soil and the corrective action methods employed were negotiated with, and approved by, the OCD. A local representative of the OCD reviewed and approved the applicable documents and performed a site inspection during the field activities.

1.3.1.2 U.S. Forest Service

The DOE/SNJV obtained authorization to access the Site and conduct remedial activities from the USFS through issuance of a special use permit. This permit delineated conditions relating to the protection of USFS lands (e.g., plants, wildlife, habitat, cultural resources) and outlined mitigation measures to be adhered to during site activities in order to lessen any unavoidable impacts. The special

use permit provided specifications for reseeded and final as built considerations. The DOE/SNJV worked with the USFS to identify site features that were deemed historically significant and warranted protection from damage during the corrective action activities. Some details regarding the as-built conditions to the Site (parking lot construction, primitive road closure, decommissioning of a primitive campground, etc.) were negotiated with the USFS outside of the confines of the special use permit and conducted in good faith.

1.3.1.3 U.S. Environmental Protection Agency

The EPA's project involvement was limited to the issuance of a National Pollutant Discharge Elimination System (NPDES) permit for storm water runoff. The corrective action work qualified for operation under the Construction General Permit NMR 150000 (CGP). During the planning stages of the project the SNJV prepared a storm water pollution prevention plan (SWPPP) (INTERA Inc. [INTERA], 2004) and submitted notices of intent (NOIs) for discharges of storm water runoff associated with construction activity to the EPA. Copies of the NOIs, dated June 10 and 17, 2004, are provided in Appendix A. The NOIs were confirmed by the EPA and the site activities were conducted in accordance with the SWPPP and the conditions of the CGP. The EPA's acknowledgement of the NOI (June 16, 2004) and a subsequent NOI amendment are also included in Appendix A.

1.3.2 Project Documents

The following documents were prepared under the direction of the DOE in preparation for completing the corrective action activities in the field. The documents provided guidelines and/or specific instructions for how the corrective actions were to be completed.

- *Surface Corrective Action Investigation Report with Surface Corrective Action Plan [CAP] for the Gasbuggy Site, New Mexico* (DOE/NV, 2004). This document provides the results of the shallow subsurface site characterization activities conducted in 2000 and 2002. The pits containing the contaminated mud were identified during these events. The recommendations in the document were for clean closure of the Site by removal of contaminated materials from the shallow subsurface. Included in the report was an appendix entitled "Gasbuggy Site Surface Proposed Corrective Action Plan." The CAP provides background information, proposes the corrective actions taken, and provides general specifications for project site set up and reclamation activities.

- *Field Instructions [FI], Mud Pit Remediation, Gasbuggy Site, Rio Arriba County, New Mexico* (Echelard, 2004). The FI provide detailed specifications and operational instructions that were followed during the corrective action process. The document was dynamic and modifications were made to the plan in the field when substantial variances between the document and the completed work occurred. When applicable, technical changes to the document were approved by the DOE NNSA/NSO Project Engineer and revisions were documented in the field activity daily log. The FI also contained design drawings showing the planned features, estimated pit boundaries, and excavation details.
- *Stormwater [sic.] Pollution Prevention Plan [SWPPP], Mud Pit Closure, Gasbuggy Site, Rio Arriba County, New Mexico* (INTERA, 2004). In accordance with the CGP and as agreed to in the NOIs sent to the EPA, the SWPPP was drafted to provide a plan that, when implemented, resulted in the prevention or reduction of pollutants in the storm water runoff during construction activities. The SWPPP includes a site description, controls to reduce pollutants, inspection requirements and forms, and a copy of the CGP. The controls specified included the silt fencing, straw bale check dams, and other best management practices (BMPs). The SWPPP was maintained on the Site throughout the duration of the field activities. Daily observations and weekly site inspections were included in forms in the appendices, and design drawings of select BMPs were appended and maintained within the plan.
- *Gasbuggy Remediation Site-Specific Health and Safety Plan [SSHASP]* (SNJV, 2004). The SSHASP provides health and safety recommendations and procedures that were followed by all personnel working within the secured project area. The SSHASP included site/material characteristics, a hazard analysis, requirements for personal protection equipment, site controls, decontamination guidelines, and emergency procedures. A copy of the SSHASP was maintained at the Site with emergency telephone numbers and hospital route maps flagged for easy identification in the event of an emergency.

1.3.3. Contract Authority and Team

The corrective action activities were directed and managed by the DOE NNSA/NSO. Field operations were performed by the SNJV as a subcontractor to the DOE. SNJV was responsible for coordination and performance of the corrective actions under the management of the Stoller-Navarro Offsites Project Manager. The SNJV project team was comprised of a DOE-designated project engineer

(DOE-PE)/site safety officer, a site supervisor (SS), a New Mexico registered professional engineer, and the field staff. The DOE-PE maintained overall field management and control over the project team and reported directly to the Stoller-Navarro Offsites Project Manager and DOE NNSA/NSO Offsites Project Manager.

The following entities and corresponding responsibilities were represented at the Site as teaming partners of the SNJV:

- Stoller-Navarro – provided the DOE-PE, site safety officer, and overall project management. Coordinated subcontracted services (trucking, analytical laboratories, waste disposal, etc.).
- INTERA – provided New Mexico professional engineer, SS, and qualifying parties for applicable New Mexico contractor's licenses.
- Weston Solutions – provided construction services and equipment. Conducted procurement of materials.

2.0 *Background*

This section provides a brief summary of activities and actions directly related to the corrective action work. Included are a description of the regulatory background, a summary of the prior site investigations, and a discussion about the development of the CAP. Descriptions provided in the CAP of the Site setting, land status, geology, hydrogeology, and operational history are not repeated here.

2.1 *Regulatory History*

Site restoration activities were conducted in August and September 1978, and included well plugging and abandonment, decontamination and disposal of equipment, and soil sampling and analysis. No soil or soil moisture samples collected during the 1978 restoration exceeded established release criteria for radioactivity; therefore, no soil remediation was required (DOE/NV, 2004).

In March 2000, data quality objective (DQO) meetings were held with the DOE NNSA/NSO, NMED Hazardous Waste Bureau (HWB), and the OCD. Subsequently, the DQO documents were submitted to the NMED HWB and a preliminary field investigation was conducted at the Site in August and September of 2000. After the Site Characterization Work Plan was submitted to the NMED HWB in February 2001, the NMED HWB indicated that they had no regulatory authority to oversee the Site. Site characterization work proceeded and was completed between July and October of 2002.

Following the completion of the field work, DOE NNSA/NSO met with the NMED HWB and the NMED VRP to discuss the findings of the field investigation and the actions necessary to close the Site under the NMED VRP regulations. Additional discussions held among DOE NNSA/NSO, NMED VRP, and the OCD between January and September 2003 resulted in a negotiated cleanup standard for TPH contamination at the Site. Based on the DOE NNSA/NSO corrective action objective of ultimately closing the Site surface with no future monitoring requirements, the DOE NNSA/NSO agreed to apply a TPH cleanup level of 100 mg/kg. This level is considered conservative and is based on OCD guidance (NMED, 2000).

2.2 Site Investigations

One of the objectives of the site characterization activities conducted in 2000 and 2002 was to identify the lateral and vertical extent of drilling mud with contaminant levels exceeding 100 mg/kg TPH. These site investigations included the following tasks: 1) surficial and shallow subsurface soil investigation, 2) geophysical investigation, 3) septic tank investigation/closure, and 4) shallow ground water investigations. (DOE/NV, 2004) Areas that were investigated included Surface Ground Zero (SGZ), the Well GB-D area, the Recording Trailer Park, the Control Point, and the Helicopter Pad (see Figure 2-1). Soil samples were analyzed for Resource Conservation and Recovery Act metals, volatile organic compounds, semivolatile organic compounds, and TPH. Concentrations of TPH and 1,2,4-trimethylbenzene were reported above background levels in one or more locations.

At SGZ, 35 soil samples contained concentrations of TPH exceeded the cleanup standard; another 133 samples had reportable concentrations less than 100 mg/kg. All of the TPH exceeding the cleanup standard at SGZ were from Well GB-E Mud Pits A, D, and E. Samples collected from the excavated mud pit at the Well GB-D area also had TPH concentrations in excess of the cleanup level. No contaminants of potential concern were identified at the other investigated sites (the Recording Trailer Park, the Control Point, and the Helicopter Pad) (DOE/NV, 2004).

Ground water in the shallowest aquifer beneath SGZ and the Well GB-D area was not found to be an exposure pathway for the contaminants of concern. The depth to ground water at the Well GB-D area was found to be approximately 52 to 58 feet below the ground surface, more than 30 feet below the deepest contamination. Ground water was not encountered below SGZ after drilling up to 74 feet below the ground surface (DOE/NV, 2004).

2.3 Corrective Action Plan

The data from the site investigations described in Section 2.1 were used as the basis for the recommendations for removal of soil contaminated with TPH above 100 mg/kg as described in the CAP. The sample points were used to delineate the extent of the required excavation necessary to meet the corrective action objectives. Because the boundaries of the proposed excavations were based on contaminant concentrations and not necessarily the extent of the drilling mud, the proposed excavation areas were not entirely consistent with historical documents and did not always include all of the drilling mud in the pits. Sheets A-1 and A-2 of the drawings included in Appendix B depict the design boundaries of the pits (as provided in the CAP) superimposed on the pre-excavation

topographic map that also shows site features in place during the corrective action activities. Sheets A-3 and A-4 show the actual limits of the excavations after the mud was removed.

The CAP also proposed general procedures and instructions for accomplishing the objectives of the corrective actions. The FI was prepared later based largely upon the provisions presented in the CAP.



Cattle Tanks
(Runoff Catchment Basins)

Well GB-D
Area

Recording
Trailer
Park

Explanation

- Well Location and Label
- ~ Major Contours at 100-ft Intervals
- Road
- Project Gasbuggy Operational Area

Note
Aerial Photograph is for Information Only and Not Coincident to Site

Scale

0 1,000 2,000 Feet

0 500 1,000 Meters

Source: USGS, 1995; EG&G/EM, 1994

Figure 2-1
Gasbuggy Site and Surrounding Area

3.0 CORRECTIVE ACTIONS

The field portion of the shallow subsurface corrective action work was completed between August 2 and September 10, 2004. Completed activities included mobilization/demobilization, mud pit excavation, backfill, reseeding, and site surveys. All work was completed under the direct supervision of the DOE-PE, a New Mexico licensed professional engineer, and a New Mexico licensed contractor. These activities are described in more detail in the following subsections.

3.1 Mobilization/Site Preparation

Mobilization and site preparation were conducted during the first week of the project, August 2 through 7, 2004. These activities were often conducted concurrently with other corrective action activities, including the excavation of topsoil. The mobilization and site preparation activities included establishment of site security/controls, mobilization of equipment, delivery of materials and supplies, and set up of temporary site structures and features.

3.1.1 Site Security and Controls

Site security was accomplished by the establishment of features that provided control of the Site from public entrance/use as well as provision of onsite controls for workers and authorized personnel. These measures described in Sections 3.1.1.1 through 3.1.1.3 served to protect site workers, the public, and the environment.

3.1.1.1 Temporary Construction Fence

A temporary construction fence was installed around the perimeter of both the SGZ and the Well GB-D areas. The fence was constructed as described in the field-revised FI. The fence material consisted of 4-foot high orange plastic with a mesh size of 1.75-inch by 1.75-inch (Tenax Gaurdian Warning Barrier). The fencing was constructed with 4-foot (nominal) steel T-posts driven approximately one foot into the ground. The fencing was secured to the T-posts with zip ties and a top wire. The top wire was installed on all perimeter fencing and gates. The safety fencing was also used around important

site features (e.g., the interpretive sign, wellhead monument) to protect them from site traffic. The perimeter fencing is shown as placed on Sheets A-3 and A-4 of the as-built drawings (Appendix B).

3.1.1.2 Designation of Work Zones

In accordance with the SSHASP, three clearly delineated work zones were established and maintained while contaminated soil was being excavated from the Site. The zones were established to protect the health and welfare of workers, the public, and the environment by 1) preventing the uncontrolled transport of contaminated materials offsite, 2) limiting to qualified individuals the number of personnel entering heavy work areas, and 3) restricting activities in certain designated zones. Established work zones included the remediation areas (RAs), decontamination stations (DSs), and the support zones (SZs).

At SGZ, the RA was designated as the area within the temporary access road and the temporary construction fence installed along USFS Road 357 (FS 357) (see Sheet A-5 of Appendix B). The temporary access road, the decontamination pad, and the stabilized construction exit served as the DS. The entrance and egress to the DS for foot travel was designated as the area immediately around the decontamination pad. The areas south and west of the temporary access road were designated as the SZ. All personnel and site visitors were made aware of the three zones, and T-posts topped with sections of "Caution" tape were placed on the RA side of the temporary access road at approximately 30-foot intervals to further designate the RA. Temporary safety fence was installed along both sides of the decontamination pad and "Authorized Personnel Only" signs were posted along the south side of the road near the office trailers.

At the Well GB-D area, the RA was specified as the area within the safety fence and east of the entrance road. The DS included a plastic liner and the stabilized construction exit. The SZ was the area outside of the safety fence. Work at the Well GB-D area was limited to specified tasks and did not include the support facilities required at SGZ.

3.1.1.3 Signage

Signs that provided the project name and information, including a contact telephone number, were posted at both entries to SGZ. The sign posted at the southeast exit also instructed all visitors to check with the site supervisor prior to entry. Traffic control signs were posted at the site entrance and on sections of FS 357. Signs and their locations of posting were as follows:

- ONE WAY DO NOT ENTER – FS 357 side of southeast entrance
-

- STOP – SGZ side of southeast exit
- CAUTION TRUCKS ENTERING – along FS 357, both east and west of the Site
- AUTHORIZED PERSONNEL ONLY – strategic locations on the Site and on the temporary construction fence facing FS 357

“Caution” tape, spray paint, painted lath, and flagging were also used to mark and protect site features.

3.1.2 Erosion, Sediment, Contamination Control

Construction and maintenance of erosion/sediment control barriers and contamination control measures were completed in accordance with the field-modified FI and the SWPPP. During the entire 6 weeks of the project, only three storms provided measurable amounts of precipitation and there was no need to employ any of the alternative erosion control methods (BMPs) provided in the SWPPP (INTERA, 2004).

Erosion and sediment controls were maintained by providing effective dust suppression over the duration of the project and by construction and maintenance of silt fencing and straw bale check dams.

3.1.2.1 Silt Fencing

Silt fencing was installed in accordance with details provided in the SWPPP and as shown on Sheet A-6 of Appendix B using pre-fabricated materials. The fencing material was a woven geotextile stapled to 1.5-inch by 1.5-inch by 3-foot wooden stakes on 10-foot (nominal) centers. The fencing was installed in trenches so that no more than 28 inches of the geotextile was above the ground surface. The bottom of the geotextile was turned against the direction of surface water flow and anchored in place with backfill from the excavated trench. The silt fencing was installed around the downgradient perimeter of both sites, around the downgradient sides of the overburden stockpile at SGZ, and around the entire perimeter of the topsoil stockpile at SGZ. The overburden and topsoil stockpiles at the Well GB-D area were placed against the perimeter silt fencing, eliminating the need for secondary silt fencing. The location of the silt fencing as installed is shown on Sheets A-3 and A-4 of the as-built drawings included in Appendix B.

3.1.2.2 Straw Bale Check Dams

Straw bale check dams were installed before the influent ends of two culverts passing under FS 357, adjacent to SGZ. The check dams were installed to prevent potential sediment from becoming

entrained in the culverts or entering the cattle tanks downgradient of the culverts. The bar ditch in which the check dams were installed did not have enough depth to construct them so that the bottoms of the end bales were higher in elevation than the top of the lowest bale as specified in the FI (Echelard, 2004). In both cases the check dams were constructed using two bales of straw placed end-to-end and perpendicular to flow in a trench excavated to 2 to 3 inches in depth. Details of the straw bale construction are provided on Sheet A-6 of Appendix B.

3.1.2.3 Diversion Berming

Soil berms were constructed along several sections of roadway to prevent runoff from carrying sediments into native vegetation along temporary or maintained roads. These berms were constructed using material cleared from the roadway and typically did not exceed 2 feet in height or width. Berms were constructed along the east side of the temporary access road near the northwest entrance to SGZ and along the east side (down hill side) of the road between SGZ and the Well GB-D area.

3.1.2.4 Construction Exits

Stabilized construction exits were placed at the exits to SGZ (southeast exit) and Well GB-D area (see locations on Sheets A-3 and A-4 of Appendix B). The stabilized construction exits were installed for the purpose of removing mud that may have adhered to the tires of the trucks and equipment that had been in operation at the Site. The construction exits were constructed so that traffic leaving the Site first crossed the decontamination pad for removal of potentially contaminated soil.

The material used in the construction exits consisted of 1- to 3-inch washed stone placed on the existing or cleared roadways. Five truck loads (approximately 60 to 80 cubic yards) of stone were delivered to the Site. The stone was placed approximately 8 to 10 inches thick across the entire width of the exit (approximately 15 feet) and for a length of approximately 100 feet. The geotextile that the FI specified should be installed between the stone and the underlying native soil was found to be unnecessary and was not installed; the FI was field-amended accordingly. During the corrective action activities, the construction exits were frequently graded to remove rutting and packed areas and to maintain their effectiveness.

3.1.2.5 Decontamination Pads

Decontamination pads were used at both SGZ and at the Well GB-D area to control the egress of contaminated material from the sites. The decontamination pad at SGZ was designed and constructed

to be able to facilitate both wet and dry decontamination methods. The pad at the Well GB-D area was simpler in construction as it was only used for several days during the excavation of drilling mud from the one pit at that location.

The decontamination pad installed at SGZ was constructed using cattle guards, 6-inch by 6-inch timbers, a geotextile, and a 60-mil synthetic liner. The subsurface beneath the pad was worked to provide a slight grade to the west end, where a depression was excavated to create a sump for accumulated decontamination/storm fluids. A single piece of 60-mil liner was placed over the prepared area and the geotextile was placed over the liner to provide slip and puncture protection between the between the steel cattle guards and the liner.

Seven 8-foot by 16-foot cattle guards were placed side by side on the liner to create a 56-foot long decontamination station able to contain fluids and solids. The cattle guards replaced the metal grating specified in the FI, as the grating was unavailable in the area. The 6-inch by 6-inch timbers were placed around the perimeter of the cattle guards and beneath the liner to provide containment of the collected decontamination waste. Soil was placed over the excess liner material to anchor it in place and minimize trip hazards around the pad. Sections of plywood were laid across the cattle guards along the edges to provide secure footing for laborers working in the DS (see Sheet A-6 of Appendix B for decontamination pad details at SGZ).

Although engineering and traffic controls implemented at the Site precluded the necessity of employing wet decontamination methods, the decontamination pad at SGZ was equipped for that possibility. Two poly-tanks were set up next to the pad, one contained potable water plumbed to a pressure washer and the other was empty but plumbed to a trash pump that was set in the sump of the decontamination pad. Power was supplied to the steam cleaner and trash pump by running an electric cord beneath the temporary access road.

Personnel leaving the RA at SGZ exited at the decontamination pad where brushes and boot cleaners were set up on tarps. A drum was also set up at the pad for depositing disposable personal protective equipment.

The decontamination pad constructed at the Well GB-D area was only needed for several days and served relatively few trucks compared to the traffic through SGZ. The pad was constructed by securing sections of plastic liners to the ground near the stabilized construction exit. Excavated material on the beds and tires of the exiting trucks was brushed off and captured on the liner prior to truck passing through the construction exit.

3.1.3 Temporary Access Road

A temporary construction road was built at SGZ to provide a stabilized route through the site for trucks and equipment. The road was constructed in accordance with design drawings provided in the FI. Approximately 974 tons (650 cubic yards) of road base material were imported to SGZ and placed on a graded surface from which the top soil had been removed. The road base was placed approximately 15 feet wide in a compacted thickness of 10 to 12 inches. Sheet A-3 in Appendix B shows the location of the temporary access road that connected the northwest entrance to the southeast exit at SGZ. Sheet A-6 shows the construction details.

A 12-inch diameter culvert was placed in the bar ditch at the northwest entrance to SGZ and covered with base material. T-posts were driven at either end of the culvert to alert vehicles of the change in shoulder conditions.

3.1.4 Temporary Facilities and Equipment

Mobilization also included the delivery and set up of other facilities and equipment that were essential to the project. These are listed below:

- Two 400-barrel frac tanks were set up inside of the RA. One of the tanks was routinely filled with potable water for dust suppression and for use in achieving proper compaction. The other tank was available for storage of storm water and decontamination fluids in the event that either heavy rain resulted in standing water in the pits during excavation work or wet decontamination methods were employed. The “dirty” water tank was not needed for its intended use during the corrective action activities.
 - Two office trailers were set up in the SZ for use by onsite personnel. One of the trailers was set up as a break trailer for operator/laborer use. A portion of this trailer was also used for equipment/materials storage. The other trailer was set up with an office for administrative activities. Site-specific documents as well as emergency phones and supplies were kept in this trailer.
 - A temporary truck scale was set up between the decontamination pad and the stabilized construction exit. The scale was limited to weighing one axle or a tandem axle at a time. The weight was displayed in the office trailer and on a “scoreboard” mounted to the outside of the office trailer. Truck weights were measured by weighing each axle/tandem axle and totaling the measurements.
-

- A generator was used to power the trailers, the steam cleaner, the sump pump, and the scale. Wiring from the generator to these items was run underground in shallow trenches.
- In compliance with 29 Code of Federal Regulations (CFR) 1926.51, two chemical toilet units and a potable water container were maintained for the duration of the project.
- Heavy equipment mobilized to the Site included two excavators, two articulated dump trucks, a water truck, a motor grader, a bulldozer, a front-end loader, and a trencher.
- Toward the completion of the project, roll-off bins were provided for disposal of uncontaminated project related waste and stockpiled debris unearthed during excavation activities.

3.2 Mud Pit Excavation

Three drilling mud pits were excavated at SGZ and one drilling mud pit was excavated at the Well GB-D area. The general process included removal of top soil, location of pit boundaries, excavation of topsoil, and removal of the drilling mud/contaminated soil. Logistics of the excavation work were generally completed in accordance with the field-modified FI.

Before commencing excavation activities, New Mexico One Call (One Call) was contacted for utility locates by subscribers to the One Call system. The only underground utility owner that responded to the One Call notification was El Paso Field Services (EPFS), which maintains a gas line along FS 357. Their gas line terminates (from the west) at the northwest corner of SGZ (see Sheet A-1 of Appendix B). The EPFS representative also checked to make sure no old gas lines ran to the former gas well identified as 1110 EPNG 10-36 (shown on Sheet A-1 of Appendix B). The line's location, which terminated within the fenced area of SGZ, was marked with pin flags. The One Call ticket was maintained throughout the project.

3.2.1 Topsoil Removal

In accordance with the FI and the special use permit issued by the USFS, the topsoil was removed from all areas that were excavated or were in heavy traffic areas. (Topsoil was defined as the top 6 inches of earth.) This included roadways, stockpile locations, and pit boundaries. Topsoil was removed from most of the area within the RA and DS at SGZ. A strip of undisturbed area, which widened on the northwest end of SGZ, was left inside of the silt fencing along the border bounded by

FS 357 (see Sheet A-1 of Appendix B). At the Well GB-D area, topsoil was removed from all but a small area on the south end of the site.

The topsoil was moved into a single stockpile at each site to preserve the soil for use in development of the vegetated layer for reseeding at the end of corrective action activities. At the Well GB-D site, the topsoil stockpile was placed at the northeast corner of the site so that the silt fencing around the site bounded two sides of the pile and contained all sediment runoff from the stockpile. The topsoil stockpile at SGZ was placed in the southwest corner of the site and completely surrounded by dedicated silt fencing. It was estimated that over 2,000 cubic yards of topsoil were stockpiled at SGZ.

Excessive debris from previous work related to the Gasbuggy Project was unearthed during the excavation of topsoil. The debris consisted largely of wiring, steel pipe, rebar, and assorted other metallic items. Encountered debris was removed from the topsoil and stockpiled onsite for disposal at a solid waste landfill (debris and construction related waste were removed from the Site during site restoration activities).

3.2.2 Pit Layout

Historical information related to the location of the drilling mud pits and laboratory analytical data from the previous site characterization activities were used to develop the excavation pit boundaries shown on the design plans included in the FI and the CAP. Daggett Enterprises, Inc. (Daggett) was contracted to provide professional surveying services that included locating and staking the drilling mud pit layouts in the field. Daggett was the surveyor of record from the earlier site characterization activities and was able to mobilize to the Site with the requisite data pre-loaded on their instruments. The pit boundaries were laid out in the configuration shown on Sheets A-1 and A-2 of Appendix B, which were derived from design plans provided in the FI. The boundaries were selected using the laboratory analytical data from the site characterization activities. The boundaries included the sample point locations where concentrations of total petroleum hydrocarbons had exceeded 100 mg/kg in soil.

The corners of each pit and the anticipated excavation footprint at the surface were staked with marked lathing. The anticipated footprint area included an additional area for benching and/or sloping of the pit walls as required for excavation safety. This additional area was typically estimated at either 20 or 30 feet from the edges of the specified limits of drilling mud excavation.

In addition to laying out the mud pit boundaries, the surveyors also located the temporary site features, site boundaries, and structures for preparation of the as-built drawings. All survey data was tied into an existing benchmark established on the monument at SGZ.

3.2.3 Overburden Excavation

Upon completion of the drilling activities in the 1960s and 1970s, the drilling mud pits were covered with fill material and contoured to the grade shown on Sheets A-1 and A-2 in Appendix B. The fill had been placed at variable depths depending on the desired topography of the Site. To access the contaminated drilling mud, the overburden material was excavated and stockpiled on site. A common stockpile was created at SGZ using overburden from the three Well GB-E mud pits (Mud Pits A, D, and E) and a separate overburden stockpile was created at the Well GB-D area.

The overburden was removed in a manner that minimized the necessity for equipment to operate from within the excavation. An approximate 4- to 8-inch layer of overburden was left over the drilling mud to prevent the mixing of contaminated material with the stockpiled soil and, in some cases, to provide a working platform inside of the pit for the equipment to operate on during the excavation of contaminated mud/soil. Test holes were periodically excavated through this overburden layer to confirm depth to the mud and the lateral extents of the pit.

The approximate volume of overburden removed from each pit is provided in Table 3-1. These volumes are based on the number of truck loads that were moved from the pit to the stockpile. These estimates do not include lesser quantities of overburden that were excavated from Well GB-E Mud Pits A and D and the Well GB-D Mud Pit that were placed directly onto the stockpile with the earth-moving equipment. Limited amounts of overburden were also placed in the center of originating pits where drilling mud had already been removed exposing the underlying native or clean soil. This occurred in several instances where stringers of contaminated material were “chased” in response to laboratory analytical results.

**Table 3-1
 Estimates of Overburden Removed**

Mud Pit	Cubic Yards of Overburden Removed
Well GB-E Mud Pit A	3,276
Well GB-E Mud Pit D	1,624
Well GB-E Mud Pit E	2,844
Well GB-D Mud Pit	990

Estimates based on dump truck capacity of 18 cubic yards (heaped).

The walls of the mud pits were benched or sloped based on the observed soil properties, depth of the excavation, and the type of work being conducted in and around the pit. The overburden in Well GB-E Mud Pits A and D and the Well GB-D mud pit was very competent and met the criteria for a Type A soil as specified in 29 CFR 1926.650. Much of the overburden in Well GB-E Mud Pit E also met the criteria for Type A soil; but deposits of moist sand were found in the deepest portions of the pit that

appeared to be less stable than the Type A soil. At a minimum, one end of every pit was excavated with a maximum of a 2:1 slope extending to the deepest portion of the pit. In Well GB-E Mud Pit E, both the north and south ends were sloped into the bottom, and the east and west sides were benched and sloped where the excavation was greater than 5 feet in depth. A competent person (as defined in 29 CFR 1926.650) and/or a registered professional engineer were onsite observing the excavation work throughout the entire project to ensure slope stability and excavation safety.

3.2.4 Drilling Mud Excavation

Once the overburden had been removed and the boundaries of the mud pits had been established, the removal of the drilling mud commenced. The remediation of the pits consisted of excavating material with TPH concentrations in excess of 100 mg/kg. The mud excavation work was staged such that contaminated material from one pit was being excavated and loaded into trucks while overburden removal or backfilling was being conducted at one of the other pits. The contaminated material was hauled from the Site in trucks contracted by Envirotech, Inc. (Envirotech). Trucks being filled with the contaminated drilling mud/soil were routed from the DS/temporary access road into the RA and adjacent to the pit from which the material was being excavated. When logistically feasible, the contaminated material was loaded directly into the waiting trucks with the excavator. Once a truck was loaded, it was routed back onto the temporary access road, across the decontamination pad, and then weighed. Excessively over- or under-loaded trucks were sent back through the RA for adjustments to their load (U.S. Department of Transportation regulations limit gross weight to less than 80,000 pounds). Prior to leaving the Site, each truck driver was provided a bill of lading documenting each load and its gross weight. Copies of the bill of lading documents are included in Appendix C.

Records provided from Envirotech indicate that approximately 5,562 cubic yards of petroleum-contaminated material were removed from the Site during the course of the project. Estimates were determined by multiplying the number of trips each truck made from the Site by the average load size, approximately 18 cubic yards. Envirotech disposed of the contaminated material at its New Mexico Oil Conservation Division permitted landfarm facility located south of Bloomfield, New Mexico. All trucks delivered their loads to the landfarm the same day the truck was loaded at the Site.

The drilling mud in all four of the excavated pits had the consistent characteristic of a readily defined vertical contaminant extent within the staked boundaries of the excavation area but less defined horizontal contaminant extent. At each pit, the drilling mud pinched out to very thin layers (stringers) at the boundaries of the pit. These stringers frequently extended for some distance outside of the

staked excavation area. The stringers commonly exhibited visual and olfactory evidence of petroleum hydrocarbon contamination. "Chasing" the mud at the edges of the pits resulted in the need to excavate significant quantities of overburden as well as the commitment of equipment and operators. As specified in the FI, excavations outside of the staked boundaries of the pit were first approved by the DOE-PE.

Once the contaminated material observed in the side walls and bottom of a pit had been removed, the equipment was removed from the vicinity of the pit and soil samples were collected for laboratory analyses. Since the final dimensions of the mud pits consistently deviated from the design plans, the sample locations were selected in the general vicinity of the sample locations specified in the FI. Two sets of soil samples were collected from each pit. One set was submitted to Envirotech for rapid turn-around analyses. The other sample set was submitted to the DOE contracted analytical laboratory. Both samples sets were analyzed for TPH using EPA Method 8015 Modified (gasoline and diesel range organics [GRO and DRO, respectively]). Soil sampling was conducted in accordance with the FI and the SNJV standard quality practices (SQPs), particularly SQP ITLV-0601, "Shallow Subsurface Soil Sampling." Sample collection data was recorded in sample collection logs and chain-of-custody forms.

The laboratory data from samples submitted to Envirotech served as screening tools to determine if additional excavation was required prior to submitting the second set of samples to the DOE contracted laboratory for certified confirmation. The dual-analysis method was employed as a cost and time saving measure, since analytical results from the DOE contracted laboratory required several days turn around time from date of collection. Confirmatory samples submitted to the DOE contract laboratory were required to have concentrations of 100 mg/kg or less before the mud pits could be considered remediated and the backfilling of the pits could begin.

The analytical results were not always consistent between the screening samples and the confirmatory samples, and it was determined that this discrepancy was likely due to different carbon ranges being reported by the two laboratories. The carbon range reported by the DOE contract laboratory included high-end hydrocarbons not typically associated with diesel fuel (up to C-38). The high carbon range included by the DOE contract laboratory may have resulted in the detection of naturally occurring hydrocarbons (e.g. crude oil deposits), which may have been transported to the surface during the circulation of the drilling mud as part of the drilling process. Envirotech limited their analyses to the carbon range typically associated with distillate fuels (C-5 to C-28). The method specified was a modified EPA method 8015 and the variance in reported carbon ranges was determined to be acceptable.

The following subsections summarize excavation activities conducted at each of the pits.

3.2.4.1 Well GB-E Mud Pit A

Well GB-E Mud Pit A was the largest of the mud pits that were excavated during the corrective action activities, with an approximate footprint of 0.6 acres. Approximately 3,375 cubic yards of contaminated material were removed from Mud Pit A. Drilling derived material was typically observed at depths of 2 to 6 feet below the ground surface. The drilling mud at the center of the pit was no more than 2 feet thick at the deepest location. A variety of metallic objects including cables, wire, drums, etc. were unearthed during excavation of the overburden. These items were removed from the soil and isolated for separate disposal at a solid waste landfill. A significant portion of the pit contained a consolidated deposit of cement or cement/bentonite grout that formed a large slab approximately 6 to 12 inches thick. Contaminated material was not observed above the deposit and only a thin layer of contaminated mud was observed beneath this slab of grout. The deposit was apparently not encountered during the site characterization activities and was not accounted for in the design plans or the FI.

The cement/bentonite grout was first encountered in a test hole excavated prior to the commencement of excavation activities. The test hole was dug at a location central to the pit to determine overburden and drilling mud thickness. Upon discovery of the grout, an attempt was made to excavate to its northern edge. The resulting trench extended approximately 40 to 50 feet to the north. Because it was evident that the unexpected grout slab was larger than could be determined efficiently by excavation, it was decided that geophysics might provide a better representation of its areal extent and thickness. Sun Belt Geophysics was contracted to conduct a survey using ground penetrating radar and electromagnetics at the pit in the hopes of defining the dimensional characteristics of the grout slab as well as locating metallic debris such as drums, tank, and/or pipelines. The survey was conducted over an approximate 200- by 200-foot grid using several different pieces of equipment.

With respect to the depths and extents of the cement/bentonite slab, the ground penetrating radar results were inconclusive. The dense dry conditions of the clayey overburden prohibited the radar from penetrating the ground more than several feet, which was not deep enough to provide conclusive results. The electromagnetic survey, however, did locate substantial amounts of metallic debris within the surveyed area, none of which appeared to be of significant size or shape. A copy of the geophysical report along with graphical representations is included in Appendix D.

Excavation plans for Well GB-E Mud Pit A were modified to include removal of the cement/bentonite slab. The overburden was removed from the entire area of the slab which extended to the north of the staked boundary of the pit. Arrangements were made to remove the slab and dispose of it at the same landfarm that was accepting the contaminated drilling mud. The material was broken into pieces less than 18 inches in size and loaded into trucks dedicated to the disposal of the slab material. Of the approximately 3,375 cubic yards of contaminated material that were removed from Well GB-E Mud Pit A, an estimated 936 cubic yards were material consisting largely of the cement/bentonite.

The north and west sides of Well GB-E Mud Pit A extended significantly beyond the design boundaries of the pit. Contaminated material was observed in thin layers extending in the western and eastern sides of the pit. Upon completion of excavation activities, the shape of the pit was more consistent with the historic dimensions shown in drawings included in the CAP. Most of the lateral "chasing" of contaminated material in the pit was based on field observations (stained areas and petroleum hydrocarbon odors). However, secondary excavation was required in some areas due to detection of TPH greater than 100 mg/kg in the initial suite of soil samples collected from the pit. Soil samples were recollected after the secondary excavation to confirm adequate removal of the contaminated drilling mud/soil.

Soil samples were first collected on August 26, 2004. Two sets of 13 samples and one duplicate sample were collected at locations shown on Sheet A-7 of Appendix B. At that time there were still areas where stringers of drilling mud were evident in the sidewall. Mud from the layer did not exhibit excessive hydrocarbon odors and it was determined that it might be suitable to leave it in place. The subsequent laboratory analytical results from the DOE contract laboratory indicated that the samples collected from the bottom of the excavation were nondetect for TPH; however, six of the sidewall samples contained TPH concentrations in excess of the cleanup levels. The areas of the pit where sample results indicated TPH levels in soil which were greater than the cleanup level included all of the sample points along the north and east sides of the pit and one location on the west side of the pit. As a result, the drilling mud was excavated from these areas until it was no longer observed in the pit sidewalls, at which point additional samples were collected. TPH concentrations in the second set of samples were all reported below the targeted cleanup level. The laboratory analytical results are summarized in Table 3-2 and laboratory analytical reports are provided in Appendix E.

3.2.4.2 Well GB-E Mud Pit D

Well GB-E Mud Pit D, located on the west side of SGZ, was located beneath a moderate grade that dropped approximately 8 feet across the area of the pit (see Sheets A-7 of Appendix B). The depth to

**Table 3-2
 Well GB-E Mud Pit A Laboratory Analytical Results**

Pin Flag Location	Field Screening Sample ID	Confirmatory Sample ID	Northing (feet) State Plane Coordinates	Easting (feet) State Plane Coordinates	Interim Screening Results TPH (mg/kg)	Confirmatory Sample Results			Comments
						TPH (mg/kg)	DRO (mg/kg)	GRO (mg/kg)	
A-1	1024A001	1024A014	2066903.7	219245.2	<2.0	<6.27	<5.7	<0.57	
A-2	1024A002	1024A015	2066853.6	219198.8	<2.0	<6.27	<5.7	<0.57	
A-3	1024A003	1024A016	2066870.1	219277.8	<2.0	<6.27	<5.7	<0.57	
A-4	1024A004	1024A017	2066968.5	219229.0	<2.0	200	200	<0.55	
A-5	1024A005	1024A018	219306.4	719468.2	30.2	6,200	6,000	200	
A-6	1024A006	1024A019	2066881.8	219315.2	43.8	944.3	940	4.3	
A-7	1024A007	1024A020	2066848.2	219307.2	<2.0	640	640	<0.54	
A-8	1024A008	1024A021	2066803.1	219295.8	<2.0	326	310	16	
A-9	1024A009	1024A022	2066791.2	219248.2	<2.0	<6.15	<5.6	<0.55	
A-10	1024A010	1024A023	2066782.7	219188.0	<2.0	<5.83	<5.3	<0.53	
A-11	1024A011	1024A024	2066822.3	219170.9	<2.0	80	80	<0.54	
A-12	1024A012	1024A025	2066900.4	219173.7	<2.0	380	380	<0.54	
A-13	1024A013	1024A026	2066943.5	219199.7	<2.0	56	56	<0.54	
A-8	Not Applicable	1024A027	2066803.1	219295.8	<2.0	1,680	1,600	80	Duplicate
A-4A	Not Applicable	1024A017A	2066969.1	219229.0	<2.0	33	33	ND	Resample
A-5A	Not Applicable	1024A018A	2066936.9	219315.5	<2.0	26	26	ND	Resample
A-6A	Not Applicable	1024A019A	2066881.6	219325.0	<2.0	34	34	ND	Resample
A-7A	Not Applicable	1024A020A	2066846.0	219316.7	<2.0	26	26	ND	Resample
A-8A	Not Applicable	1024A021A	2066790.4	219297.8	<2.0	16	16	ND	Resample
A-12A	Not Applicable	1024A025A	2066913.0	219173.2	<2.0	18	18	ND	Resample

mg/kg = milligrams per kilogram

ND = No detection above the laboratory detection limit (variable)

Bold designates concentrations that exceed the cleanup level of 100 mg/kg

the top of the mud in the pit varied between 6 to 15 feet below ground surface (see cross sections provided on Sheet A-8 of Appendix B). The thickness of the drilling mud was greatest in the southeast corner of the pit at approximately 4 feet. The depth to mud, slope stability, and reach of the excavation equipment were factors that resulted in a modified loading process at this location. At all other pits the trucks were loaded directly from the pit using the excavator. To reach the mud in Well GB-E Mud Pit D, the excavator entered the pit from a ramp excavated at the lowest point on the northwest corner. Because a layer of overburden was left in place over the mud, the direct exposure of the equipment and operator to contaminated material was limited. The excavator moved the mud to the access ramp where the loader was used to transfer the mud to the waiting trucks. Drilling mud was not stockpiled outside of the pit boundaries.

As in Well GB-E Mud Pit A, portions of a cement/bentonite deposit were encountered in the west side of the pit at approximately the same depth as the drilling mud. A clay liner that had been observed in several other places between the drilling mud and the native soil was observed directly under the cement deposit. This clay did not display visual or olfactory evidence of petroleum hydrocarbon contamination. The cement was left in place to prevent unnecessary excavation to beyond the established pit boundary.

In addition to the cement deposit, many large tree stumps were encountered at the interface between the drilling mud and the overburden. Many of these stumps were partially submerged in the mud and could not be disposed of as solid waste because of the contamination of the wood. The stumps were pulled aside and ultimately disposed of by loading them with other debris that was found in the drilling mud and disposed of by Envirotech at their landfarm.

As observed during excavation of the other pits, the drilling mud in Well GB-E Mud Pit D pinched out to stringers at the edges. Several of these layers were overlooked during excavation and only found when the pit was inspected during sampling or after equipment had moved away from the hole and it was safe to enter on foot. Several iterations of "chasing" the drilling mud at the pit edges were required to fully excavate all the contaminated material.

Only one sample collected from the original suite of confirmatory samples was reported to have TPH concentrations in excess of the cleanup level (100 mg/kg). This contaminated sample was from the south edge of the pit toward the east side, at sample location D-6 (see sample locations shown on Sheet A-7 of Appendix B). Additional removal of overburden and small amounts of drilling mud were excavated from that area and the sample was recollected and found to be within the compliance level

**Table 3-3
 Well GB-E Mud Pit D Laboratory Analytical Results**

Pin Flag Location	Field Screening Sample ID	Confirmatory Sample ID	Northing (feet) State Plane Coordinates	Easting (feet) State Plane Coordinates	Interim Screening Results TPH (mg/kg)	Confirmatory Sample Results			Comments
						TPH (mg/kg)	DRO (mg/kg)	GRO (mg/kg)	
D-1	1024D001	1024D012	Not Recorded	Not Recorded	<2.0	ND	ND	ND	
D-2	1024D002	1024D013	2066792.3	219406.1	<2.0	ND	ND	ND	
D-3	1024D003	1024D014	2066771.2	219413.0	<2.0	ND	ND	ND	
D-4	1024D004	1024D015	2066787.8	219431.0	<2.0	19	19	ND	
D-5	1024D005	1024D016	2066768.0	219432.4	<2.0	7.7	7.7	ND	
D-6	1024D006	1024D017	2066754.6	219417.5	<2.0	111	110	1	
D-7	1024D007	1024D018	2066759.9	219382.0	<2.0	ND	ND	ND	
D-8	1024D008	1024D019	2066768.1	219355.2	<2.0	10	10	ND	
D-9	1024D009	1024D020	2066782.1	219357.7	<2.0	14	14	ND	
D-10	1024D010	1024D021	2066806.9	219401.9	<2.0	21	21	ND	
D-11	1024D011	1024D022	2066811.2	219412.6	<2.0	ND	ND	ND	
D-6A	Not Applicable	1024D017A	2066752.8	219406.2	<2.0	<5.92	<5.4	<0.52	Resample

mg/kg = milligrams per kilogram

ND = No detection above the laboratory detection limit (variable)

Bold designates concentrations that exceed the cleanup level of 100 mg/kg

for TPH. Laboratory analytical results are summarized in Table 3-3. Approximately 1,008 cubic yards of petroleum-contaminated material were removed from Well GB-E Mud Pit D.

3.2.4.3 Well GB-E Mud Pit E

Well GB-E Mud Pit E, located on the west side of SGZ (see Sheet A-3 of Appendix B), was the first pit excavated. An estimated 891 yards of petroleum contaminated material were excavated from the pit over three days. The depth to the top of the drilling mud was approximately 10 feet below grade at the center of the pit. Toward the north end of the pit, the mud dipped deeper into an apparent trench that crossed the entire length of the pit in an east/west orientation (see the cross sections provided on Sheet A-8 of Appendix B). The bottom of the trench was approximately 15 to 20 feet deep at the deepest point. The mud was approximately 1 to 3 feet thick. For the most part, the excavation of the drilling mud was from within the staked boundaries. A small amount of mud was "chased" in the northeast portion of the pit.

A greater amount of debris was removed from Well GB-E Mud Pit E during excavation than was removed from the other mud pits; particularly from the north end of the pit. Near the northeast corner of the pit, a concentrated amount of cable, wiring, wood, metal, glass, and other debris extended into the pit from the west wall. The debris that was within the boundaries of the excavation was removed from the pit and disposed of separately in the roll off bins. Some of the debris that was pulled from the drilling mud was isolated from the rest of the uncontaminated waste material and removed from the Site by Envirotech for proper disposal at its landfarm.

The cement/bentonite material found in the other pits was also discovered in the southeast corner of the Mud Pit E. The deposit was less consolidated than the material found in Well GB-E Mud Pits A and D. There was no evidence of contaminated material above or beneath the cement/bentonite; therefore, it was left in place.

Laboratory analytical results from of the samples collected from the 11 sample locations in Well GB-E Mud Pit E (interim field screening and confirmatory) were reported below the cleanup level of 100 mg/kg for TPH. Sample locations are shown on Sheet A-7 of Appendix B and analytical results are summarized in Table 3-4.

3.2.4.4 Mud Pit GB-D

The mud pit at the Well GB-D area contained quantities of drilling related waste but comparatively less petroleum-impacted drilling mud than observed at the other pits. The mud was overlain by what

Table 3-4
Well GB-E Mud Pit E Laboratory Analytical Results

Pin Flag Location	Field Screening Sample ID	Confirmatory Sample ID	Northing (feet) State Plane Coordinates	Easting (feet) State Plane Coordinates	Interim Screening Results TPH (mg/kg)	Confirmatory Sample Results			Comments
						TPH (mg/kg)	DRO (mg/kg)	GRO (mg/kg)	
E-1	1024E001	1024D012	2067009.9	219025.2	<2.0	ND	ND	ND	
E-2	1024E002	1024D013	2066998.4	219077.2	<2.0	ND	ND	ND	
E-3	1024E003	1024D014	2066979.6	219041.0	<2.0	35	35	ND	
E-4	1024E004	1024D015	Not Recorded	Not Recorded	<2.0	ND	ND	ND	
E-5	1024E005	1024D016	2067019.9	219065.7	<2.0	ND	ND	ND	
E-6	1024E006	1024D017	2066985.9	219065.1	<2.0	ND	ND	ND	
E-7	1024E007	1024D018	2066977.4	219055.6	<2.0	14.98	14	0.98	
E-8	1024E008	1024D019	2066964.9	219051.6	<2.0	13.76	13	0.76	
E-9	1024E009	1024D020	2066968.7	219018.8	<2.0	ND	ND	ND	
E-10	1024E010	1024D021	2066981.8	219011.2	<2.0	ND	ND	ND	
E-11	1024E011	1024D022	2067014.2	219012.4	<2.0	ND	ND	ND	

mg/kg = milligrams per kilogram

ND = No detection above the laboratory detection limit (variable)

appeared to be drill cuttings and recirculation process waste material from the drilling activities. Contaminated mud was not observed in the overlying material. A thin layer of drilling mud was encountered at about 4 feet below grade on the east end of the pit and got gradually deeper to approximately 6 to 8 feet deep on the west side of the pit (see cross sections on Sheet A-8 of Appendix B). The mud thickness varied from less than 1 inch to about 8 inches within this pit. The drilling mud was found to extend outside the design boundary of the pit in the northwest corner, along the west side, and particularly in the southwest corner where the thickest layer of drilling mud was identified.

The mud layer was “chased” where practicable. Removal of large quantities of overburden was required to reach the mud in some areas. The western extent of the pit was constrained by the site entrance road and two Ponderosa Pine trees restricted the southeast corner of the pit. At the request of the USFS, efforts were made to protect these trees. As indicated, the most extensive occurrence of drilling mud was observed in the southwest corner. The mud was “chased” to a point that was within approximately 5 feet of the trees and where the root mass was increasingly evident in the side wall of the pit. Although there was continued evidence of drilling mud in the side wall at this location, the confirmatory sample collected from the mud layer did not have reportable concentrations of TPH above the cleanup level.

Five of the first set of 11 confirmatory samples that were submitted to the DOE contract laboratory from Mud Pit GB-D contained TPH concentrations exceeding the cleanup level. Laboratory analytical data is summarized in Table 3-5 and sample locations are shown on Sheet A-7 of Appendix B. Three of the samples (locations M-8 through M-10) were located on the west wall of the pit, one was on the north side of the pit (location M-4), and one was on the pit bottom in the northeast corner (location M-2). The bottom sample had been collected above a deposit of cement that extended into the pit from the northeast corner. The cement was nearly 1 foot thick and had only a very thin layer of clay liner material beneath it. The cement was left in place and more of the overlying material was excavated. The secondary confirmatory sample was collected from beneath the cement after it had been broken and pulled back to reveal the soil beneath it. Additional excavation and removal of overburden and drilling mud was conducted in the sidewalls where the TPH levels were greater than 100 mg/kg. After additional excavation, samples were recollected from the new side wall locations and all of the secondary confirmation samples were reported below the cleanup level.

Approximately 288 cubic yards of petroleum impacted material were removed from Mud Pit GB-D and disposed by Envirotech, at its landfarm facility.

**Table 3-5
 Mud Pit GB-D Laboratory Analytical Results**

Pin Flag Location	Field Screening Sample ID	Confirmatory Sample ID	Northing (feet)	Easting (feet)	Interim Screening Results TPH (mg/kg)	Confirmatory Sample Results			Comments
						TPH (mg/kg)	DRO (mg/kg)	GRO (mg/kg)	
M-1	1024M001	1024M012	2065770.795	220165.4681	<2.0	ND	ND	ND	
M-2	1024M002	1024M013	2065773.846	220213.676	<2.0	910	910	ND	
M-3	1024M003	1024M014	2065759.429	220217.6262	<2.0	ND	ND	ND	
M-4	1024M004	1024M015	2065789.237	220175.3235	<2.0	2,200	2,200	ND	
M-5	1024M005	1024M016	2065796.068	220209.4779	<2.0	70	70	ND	
M-6	1024M006	1024M017	2065779.9	220232.8	<2.0	26	26	ND	
M-7	1024M007	1024M018	2065746.849	220228.9657	<2.0	39	39	ND	
M-8	1024M008	1024M019	2065724.89	220203.2376	<2.0	170.83	170	0.83	
M-9	1024M009	1024M020	2065750.07	220175.2971	<2.0	788	770	18	
M-10	1024M010	1024M021	2065765.021	220150.4947	<2.0	140	140	ND	
M-11	1024M011	1024M022	2065790.8	220151.9	<2.0	24	24	ND	
M-2A	Not Applicable	1024M013A	Not Recorded	Not Recorded	<2.0	ND	ND	ND	Resample
M-4A	Not Applicable	1024M015A	2065789.237	220175.3235	<2.0	ND	ND	ND	Resample
M-8A	Not Applicable	1024M019A	2065721.7	220200.5	<2.0	ND	ND	ND	Resample
M-9A	Not Applicable	1024M020A	2065736.8	220170.1	<2.0	45	45	ND	Resample
M-10A	Not Applicable	1024M021A	2065765.021	220150.4947	<2.0	76	76	ND	Resample

mg/kg = milligrams per kilogram

ND = No detection above the laboratory detection limit (variable)

Bold designates concentrations that exceed the cleanup level of 100 mg/kg

3.3 Backfill

The processing and placement of backfill material began upon receipt of confirmatory sample results that indicated that the mud pits had been remediated to the cleanup level of 100 mg/kg TPH or less. To reduce the amount of recontouring that would have been required to replace the volume of drilling mud excavated, clean fill was imported by Envirotech and stockpiled on site. The imported fill was delivered by the same trucks used to transport the drilling mud to the approved location. The beds of the trucks were decontaminated between offloading the contaminated material and being loaded with backfill. Envirotech records indicate that 3,420 cubic yards of fill were imported. The imported fill was fine-grained sand with minor amounts of silt. Envirotech certified the soil as being free of petroleum hydrocarbons and provided laboratory analytical results from a sample collected from the fill. The laboratory analytical report is provided in Appendix F.

In addition to using the imported fill, the road base and stabilized construction exit material were also used as fill. During the last few days of the project that included the excavation of residual drilling mud from select pits, the road base from the temporary access road was gradually pulled up and stockpiled. Several hundred cubic yards of the road base were then used as backfill in Well GB-E Mud Pit E. The road base constituted the first lift that was placed in the deepest portion of the pit. The stone from the construction exit at SGZ (approximately 40 to 50 cubic yards) was placed in the bottom of Well GB-E Mud Pit D and covered with a layer of the imported sand fill. Stone from the construction exit at the Well GB-D area (approximately 20 to 25 cubic yards) was placed in a single lift in the bottom of the Well GB-D Mud Pit (west end only).

Typical backfill procedures included placement of the backfill in approximate 8-inch lifts, hydrating the backfill, and track and/or wheel roll compacting using heavy equipment. The lifts placed from the bottom to within one or two lifts of the ground surface were typically comprised of a 2:1 mixture of overburden (which had a natural clay content that was easily compacted) to imported fill. The two materials were mixed to provide the imported fill with increased cohesive properties that would optimize the compaction. The top several lifts were comprised totally of the original overburden.

The compaction of the backfill was conducted in accordance with the field-amended FI. Neither the CAP nor the FI specified optimum compaction requirements; however, by adding moisture to the soil, and by making multiple passes with the bulldozer and other heavy equipment, compaction was achieved to the satisfaction of the DOE-PE and the New Mexico professional engineer.

3.4 Site Restoration

The objective of this corrective action was to remove the buried contaminated drilling mud and return the Site to a natural appearance. Site restoration activities were conducted during and after the mud pits had been backfilled. Restoration included re-contouring the excavated areas, removing temporary structures and facilities, replacing topsoil, revegetating/reseeding, construction of a permanent parking lot for the USFS, and mobilizing offsite. The site restoration activities were conducted in accordance with the FI and the special use permit.

3.4.1 Surface Contouring

The use of imported fill material for backfill minimized the need for re-contouring during the site restoration work. At SGZ, Well GB-E Mud Pits D and E were backfilled to near pre-excitation grade using imported material and overburden. Nearly all of Well GB-E Mud Pit A (except for about 10 to 20 percent of the area) was backfilled before the stockpiled overburden/imported fill was depleted. To make up for the deficit, soil was pulled from several areas around the south end of Well GB-E Mud Pit A and re-contoured to create a grade that matched the surrounding topography. After all the pits were backfilled and re-contouring was complete, the entire area of SGZ was graded to create an uninterrupted surface and eliminate depressions that would allow freestanding surface water to collect. The footprints of the stockpile areas were cleared to the original grade (less topsoil).

The surface topography at SGZ slopes gradually from the south to the north. Runoff drains to the bar ditch along FS 357 where it eventually is routed through culverts spaced at intervals beneath the road to the drainage north of the road. Two culverts are located under the section of road that bounded SGZ, one at the northwest corner of SGZ and one midway between the two temporary entrances to the Site. To divert runoff evenly between the two culverts, a dike was reconstructed at the north end of the former Well GB-E Mud Pit A. The dike was an existing site feature prior to the excavation activities; however, it had been removed during the topsoil removal. The dike was constructed several feet high and extended from the toe of the backfilled area of Well GB-E Mud Pit A across a natural depression to just down gradient of the eastern culvert.

At the Well GB-D site, the available fill material was nearly sufficient to bring the pit back to original grade. To make up for the shortage, soil was moved from the north and east of the pit to re-contour the pit area. The re-contouring did not significantly alter the original grade, which sloped gradually from south to north.

The final topography of SGZ and the Well GB-D area are shown on Sheets A-9 and A-10 of Appendix B, respectively.

3.4.2 Topsoil Placement

Once the backfill and re-contouring activities had been completed, the Site was prepared for reseeded. The topsoil that had been removed from the two areas (SGZ and the Well GB-D site) was replaced in a single lift of approximately 4 to 6 inches. The topsoil was placed using the bulldozer and/or the motor grader. Once placed, the entire area, including the stockpile areas, was bladed to a uniform thickness with the motor grader. Debris exposed during topsoil placement (including cement, cables, wood, dead vegetation, wiring, and miscellaneous metal/plastic) was removed from the topsoil and disposed of with the other project-generated waste.

Topsoil compaction was limited to the operation of the equipment over the topsoil when being put in place and the subsequent traffic during reseeded efforts. The reseeded efforts required soil that could be easily worked and not overly compacted or overly moist. Minimal amounts of potable water were used for dust suppression to prevent crusting of the topsoil.

In addition to spreading topsoil over excavated areas, the topsoil in other areas of the two sites was also worked to optimize the reseeded process. There were areas on both sites where topsoil was not removed during preparation for excavation but had been subjected to heavy traffic during the project, resulting in hard packed areas and damage to the vegetation. The USFS had also requested that the unmaintained road from SGZ to the Well GB-D area be reseeded. Restoration of these areas included ripping with the motor grader in preparation for reseeded.

3.4.3 Reseeding

Reseeded activities were conducted by Envirotech in accordance with USFS specifications and the FI. The only deviation from the FI was that the seed was not hydraulically placed but was applied dry. This was done to retard germination to prevent damage to new growth by freezing temperatures in the upcoming winter months.

The reseeded process was done in staged applications by mechanical spreading. The first stage was the spreading of fertilizer consisting of a 20-20-10 mixture (20% total nitrogen, 20% available phosphate, and 10% soluble potash [K₂O] – the balance was an inert clay-based carrier). The second stage was the application of lime over the prepared topsoil. The lime was 98% pure pelleted calcium carbonate (prilled). The third stage was seeding with a USFS approved seed mix. A mechanical seeder

was used to apply the seed mixture to the top 4 inches of the topsoil or scarified areas. An analysis of the applied seed mixture is summarized in Table 3-6. An application rate of approximately 12 to 17 pounds per acre was used for reseeding. The last stage was application of a mulch cover. The mulch was barley straw that was broadcast over the seeded areas and pinched into the topsoil. The straw was certified to be weed free in accordance with the Weed Free Forage Crop Certification Act 35-27.5 of Colorado. The certification for the straw is included in Appendix G.

**Table 3-6
 Bulk Seed Mixture**

Species	Variety	Total Bulk Weight Applied*	Total PLS Weight Applied*	Specified Application Rate (lbs/acre)
Four-wing Saltbrush	New Mexico Native	10.07	3.75	0.25
Pubescent Wheatgrass	Luna	33.09	30.00	2.0
Small Burnet	Delar	15.78	15.00	1.0
Indian Ricegrass	Paloma	16.03	15.00	1.0
Blue Grama Grass	Hachita	23.77	15.00	1.0
Western Wheatgrass	Arriba	35.30	30.00	2.0
Antelope Bitterbrush	Purshia Tridentata	1.98	1.50	0.10
Intermediate Wheatgrass	Oahe	0.0	0.0	2.0

*Shown in pounds
 PLS = Pure Live Seed
 lbs/acre = pounds per acre

3.4.4 Parking Lot

At the request of the USFS, a permanent parking area was constructed at that southeast entrance to SGZ using project equipment and salvaged materials. The parking area is to facilitate the current and future interpretive facilities associated with Project Gasbuggy. Currently the Site is marked with an interpretive sign and certain features (e.g., the pipe rack, cement pads, and SGZ monument) are being left in place for the benefit of the public. The parking area provides a place for the public to access these features without traveling off road and detrimentally affecting the site restoration work that was completed.

Road base collected from the temporary access road was used to construct the parking area. The road base was placed in an approximate 8 to 10 inches thick lift from FS 357 to just southeast of the well marker for 1565 GB-2RS, forming a cul de sac/parking area. Compaction was achieved with liberal water application and wheel compaction with heavy equipment. A berm/bar ditch was constructed around the west and north sides of the parking lot to prevent off-road travel to areas that had been reseeded. A 2-foot-high berm was constructed using soil excavated from a bar ditch that was excavated on the side of the berm opposite the parking area. A narrow cut in the berm was left to allow foot traffic to the interpretive sign. The parking lot area is shown on Sheet A-9 of Appendix B.

3.4.5 Demobilization

All temporary facilities and structures that were mobilized to the Site were removed prior to completion of the project. The suppliers recovered the trailers, tanks, equipment, generator, portable toilets, roll-off bins, and truck scales. Tools, poly-tanks, and support equipment were packed and removed by site personnel. Expendable items were disposed of in the roll-off bins or donated to local entities. Demobilization and final site restoration activities included the following:

- The temporary construction fencing was removed and disposed. The T-posts were pulled and either used for traffic control or donated to the USFS.
- The decontamination pad at SGZ was decommissioned following the completion of excavation work. The cattle guards were cleaned and returned to the supplying vendor. The liner, geotextile, and timbers were disposed of in the roll-off bins. The decontamination pad material from the Well GB-D area was rolled so that captured soil removed from the sides of the trucks was retained in the plastic liner and then placed in the roll-off bin.
- The culvert from the northeast entrance to the Site was removed and the bar ditch was repaired. A portion of the culvert was damaged and disposed of and the other section was donated to the Jicarilla Apaches.
- All of the silt fencing was removed and disposed of in the roll-off bin. The option of leaving the silt fencing up over the winter had been explored; however the fabric was degrading, resulting in tears and holes. Cattle and wildlife would likely have contributed to the rapid demise of the silt fencing had it been left in place. The fence stakes were removed and the buried portions of the fabric were removed. The straw bale check dams were left in place in front of the culverts in the bar ditch of FS 357 to trap potential sediments. The check dams will eventually degrade and wash away or be removed by the USFS.
- At the request of the USFS, a primitive camping area near GB-D was decommissioned. A picnic table was moved to the nearby Gasbuggy Campground and materials from the fire ring were used to block the road between SGZ and the Well GB-D area to protect the reseeded area.

In all, two roll-off bins (approximately 20-cubic-yard capacity) were filled with debris from the project operations and demobilization waste. The bins were removed from the Site and the waste was disposed of in a solid waste landfill.

4.0 Conclusions

The corrective action activities conducted at the Gasbuggy site resulted in the excavation and removal of approximately 5,562 cubic yards of contaminated material from the three mud pits at SGZ and the mud pit within the Well GB-D area. The contaminated material consisted primarily of drilling mud, contaminated soil (from contact with the drilling mud), and cement/bentonite material (mixed with drilling mud/soil that was removed from Well GB-E Mud Pit A). Table 4-1 summarizes the amount of contaminated drilling mud/soil that was excavated from each pit.

**Table 4-1
Contaminated Drilling Mud/Soil Volume Summary**

Mud Pit	Approximate Volume (cubic yards)
Well GB E Mud Pit A	3,375
<i>Drilling Mud/Soil</i>	<i>2,439</i>
<i>Cement/Bentonite</i>	<i>936</i>
Well GB E Mud Pit D	1,008
Well GB E Mud Pit E	891
Well GB-D Mud Pit	288

The contaminated materials were excavated from each pit to the extent that the all drilling mud was removed until laboratory analytical results confirmed that all contaminated material containing concentrations of TPH greater than the cleanup level of 100 mg/kg had been removed. All contaminated materials were disposed of offsite at Envirotech's landfarm.

The remediation activities were conducted in accordance with the FI and/or approval of the DOE-PE with the objective of removing all identified contaminated drilling mud from the shallow subsurface soil. At the completion of the excavation activities, field observations and laboratory analytical data from confirmatory soil samples confirmed that the corrective action objectives had been met. The Site has been successfully prepared for the final steps in obtaining clean closure status through the NMED VRP.

Site restoration included backfilling the excavated material with clean imported fill and overburden materials, and reseeding disturbed areas. A site visit conducted on October 18, 2004, (over five weeks from reseeding efforts) confirmed that the reseeding efforts had resulted in the growth of native flora.

Heavy rains had been reported between the demobilization date and the October site visit for that area of New Mexico. However, no evidence of erosion, sediment runoff, or standing water was observed.

5.0 References

- DOE/NV, see U.S. Department of Energy, National Nuclear Security Administration, Nevada Site Office, Environmental Restoration Division.
- DOE/NV/OPA, see U.S. Department of Energy, National Nuclear Security Administration, Nevada Site Office, Office of Public Affairs.
- Echelard, T. R., July 2004. *Field Instructions, Mud Pit Remediation, Gasbuggy Site, Rio Arriba County, New Mexico*, report prepared by SNJV (Echelard, 2004).
- INTERA Inc., May 2004. *Stormwater Pollution Prevention Plan, Mud Pit Closure, Gasbuggy Site, Rio Arriba County, New Mexico*, report prepared by INTERA, Inc., Albuquerque, NM (INTERA, 2004).
- NMED, see New Mexico Environment Department
- New Mexico Environment Department, 2000. *Use of Total Petroleum Hydrocarbon (TPH) Test Results for Site Characterization*, Position paper prepared by the NMED HWB, Santa Fe, NM (NMED, 2000).
- SNJV, see Stoller-Navarro Joint Venture
- Stoller-Navarro Joint Venture, July 2004. *Gasbuggy Remediation Site-Specific Health and Safety Plan*, report prepared by SNJV (SNJV, 2004).
- U.S. Department of Energy, National Nuclear Security Administration, Nevada Site Office, Environmental Restoration Division, April 2004. *Surface Corrective Action Investigation Report with Surface Corrective Action Plan for the Gasbuggy Site, New Mexico*, DOE/NV report DOE/NV-908 (DOE/NV, 2004).
- U.S. Department of Energy, National Nuclear Security Administration, Nevada Site Office, Office of Public Affairs, July 29, 2004. "Environmental Investigations Conducted at Former Nuclear Test Site", DOE/NV press release NV-04-161 (DOE/NV, 2004).
-

APPENDIX A

NPDES NOI DOCUMENTS



From: EPACDX@csc.com [mailto:EPACDX@csc.com]
Sent: Wednesday, June 16, 2004 10:28 PM
To: Cynthia P. Ardito
Subject: Approval Acknowledgement for Your Storm Water eNOI Submission

*** This is an automated response ***
*** Please DO NOT REPLY to this email. ***
*** Replies will not be answered ***

INTERA INC.
6501 AMERICAS PARKWAY, SUITE 820
ALBUQUERQUE, NM 87110

Dear CYNTHIA ARDITO,

This email/letter acknowledges that you have submitted a complete Notice of Intent form to be covered under the NPDES General Permit for Storm Water Discharges From Construction Activity (Construction General Permit). Coverage under this permit began at the conclusion of your seven-day waiting period, on Thursday, June 17, 2004.

This letter acknowledges receipt of a complete Notice of Intent. However, it is not an EPA determination of the validity of the information you provided. Your eligibility for coverage under the Permit is based on the validity of the certification you provided. Your signature on the Notice of Intent certifies that you have read, understood, and are implementing all of the applicable requirements. An important aspect of this certification requires that you correctly determine whether you are eligible for coverage under this permit.

As you know, the Construction General Permit requires that you have developed and have begun implementing a Stormwater Pollution Prevention Plan (SWPPP) and outlines important inspection and recordkeeping requirements. You must also comply with any additional location-specific requirements applicable to your state or tribal area. A copy of the Construction General Permit must be kept with your SWPPP. An electronic copy of the Permit and additional guidance materials can be viewed and downloaded at <http://www.epa.gov/npdes/stormwater/cgp>.

For tracking purposes, the following number has been assigned to your Notice of Intent Form: NMR15DH27. Attached to this email, you will find an electronic copy of your completed NOI which should be posted at your site.

If you have general questions regarding the storm water program or your responsibilities under the Construction General Permit, please call Brent Larsen, the EPA Region 6 Stormwater program contact, at (214) 665-7523.

If you have questions about your Notice of Intent form, please call the EPA Notice Processing Center at 1 (866) 352-7755 (toll free) or send an inquiry via the online form at

<http://www.epa.gov/npdes/noicontact>.

Sincerely,

EPA Notice Processing Center
Operated by CTGi
1200 Pennsylvania Ave. NW
Mail Code: 4203M
Washington, DC 20460
1-866-352-7755

If you have difficulty accessing CDX, please contact the
CDX Help Desk at: (888) 890-1995

CDX: <http://cdx.epa.gov>

United States Environmental Protection Agency
Central Data Exchange
A New Paradigm for Environmental Reporting.

NPDES
Form



United States Environmental Protection Agency
Washington, DC 20460

Notice of Intent (NOI) for Storm Water Discharges Associated with
Construction Activity Under an NPDES General Permit

Submission of this Notice of Intent (NOI) constitutes notice that the party identified in Section II of this form requests authorization to discharge pursuant to the NPDES Construction General Permit (CGP) permit number identified in Section I of this form. Submission of this NOI also constitutes notice that the party identified in Section II of this form meets the eligibility requirements of the CGP for the project identified in Section III of this form. Permit coverage is required prior to commencement of construction activity until you are eligible to terminate coverage as detailed in the CGP. To obtain authorization, you must submit a complete and accurate NOI form. Refer to the instructions at the end of this form.

I. Permit Number

NMR115101010

II. Operator Information

Name: U S I DEPT OF ENERGY

IRS Employer Identification Number (EIN):

Mailing Address:

Street: P O BOX 98518

City: LAS VEGAS State: NV Zip Code: 891193 - 8518

Phone: 702 - 295 - 11037 Fax (optional): 702 - 295 - 11113

E-mail (optional): SANDERS@NM.DOEI.GOV

III. Project/Site Information

Project/Site Name: GAASBUGGY SITE

Project Street/Location: 47 MILES SE OF CUBA NEW MEXICO

City: CUBA State: NM Zip Code: 871103 -

County or similar government subdivision: RIO ARRIBA

Latitude/Longitude (Use one of three possible formats, and specify method)

- | | |
|---|--|
| Latitude 1. ° ' " N (degrees, minutes, seconds) | Longitude 1. ° ' " W (degrees, minutes, seconds) |
| 2. ° ' " N (degrees, minutes, decimal) | 2. ° ' " W (degrees, minutes, decimal) |
| 3. ° N (decimal) | 3. ° W (decimal) |

Method: U.S.G.S. topographic map EPA web site GPS Other:
- If you used a U.S.G.S. topographic map, what was the scale: 1:24000

Project Located in Indian country? Yes No

If so, name of Reservation or if not part of a Reservation, put "Not Applicable":

Estimated Project Start Date: 07 / 19 / 2004 Estimated Project Completion Date: 09 / 03 / 2004
Month Date Year Month Date Year

Estimated Area to be Disturbed (to the nearest quarter acre): 110.01

IV. SWPPP Information

Has the SWPPP been prepared in advance of filing this NOI? Yes No

Location of SWPPP for viewing: Address in Section II Address in Section III Other

If Other:

SWPPP Street: _____

City: _____

State: Zip Code: _____ - _____

SWPPP Contact Information (if different than that in Section II):

Name: CYNTHIA ARDITO

Phone: 505 - 246 - 1600 Fax (optional): 505 - 246 - 2600

E-mail (optional): CARDITO@INTERA.COM

V. Discharge Information

Identify the name(s) of waterbodies to which you discharge. LEANDRO CANYON

Is this discharge consistent with the assumptions and requirements of applicable EPA approved or established TMDL(s)?

Yes No

VI. Endangered Species Act

Under which criterion of the permit have you satisfied your ESA eligibility obligations?

A B C D E F

• If you select criterion F, provide permit tracking number of operator under which you are certifying eligibility:

VII. Certification Information

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print Name: PETER A. SANDERS

Print Title: OFFSITES PROJECT MANAGER

Signature: PETER A. SANDERS

Date: JUNE 17, 2004

NPDES
Form



United States Environmental Protection Agency
Washington, DC 20460

Notice of Intent (NOI) for Storm Water Discharges Associated with
Construction Activity Under an NPDES General Permit

Submission of this Notice of Intent (NOI) constitutes notice that the party identified in Section II of this form requests authorization to discharge pursuant to the NPDES Construction General Permit (CGP) permit number identified in Section I of this form. Submission of this NOI also constitutes notice that the party identified in Section II of this form meets the eligibility requirements of the CGP for the project identified in Section III of this form. Permit coverage is required prior to commencement of construction activity until you are eligible to terminate coverage as detailed in the CGP. To obtain authorization, you must submit a complete and accurate NOI form. Refer to the instructions at the end of this form.

I. Permit Number

NMR115101010

II. Operator Information

Name: INTERA INC.

IRS Employer Identification Number (EIN): 74 - 30110638

Mailing Address:

Street: 6501 AMERICAS PARKWAY, SUITE 82

City: ALBUQUERQUE State: NM Zip Code: 87110

Phone: 505 - 246 - 1600 Fax (optional): 505 - 246 - 2600

E-mail (optional): CARDITO@INTERA.COM

III. Project/Site Information

Project/Site Name: GASBUGGY SITE

Project Street/Location: 47 MILES TO SE OF CUBA, NEW MEX

City: CUBA State: NM Zip Code: 87103

County or similar government subdivision: RIO ARRIBA

Latitude/Longitude (Use one of three possible formats, and specify method)

- | | |
|--|---|
| Latitude 1. ___° ___' ___" N (degrees, minutes, seconds) | Longitude 1. ___° ___' ___" W (degrees, minutes, seconds) |
| 2. ___° ___' ___" N (degrees, minutes, decimal) | 2. ___° ___' ___" W (degrees, minutes, decimal) |
| 3. ___° ___' ___" N (decimal) | 3. ___° ___' ___" W (decimal) |

Method: U.S.G.S. topographic map EPA web site GPS Other:
- If you used a U.S.G.S. topographic map, what was the scale: 1:24,000

Project Located in Indian country? Yes No

If so, name of Reservation or if not part of a Reservation, put "Not Applicable":

Estimated Project Start Date: 07 / 19 / 2004 Estimated Project Completion Date: 09 / 03 / 2004
Month Date Year Month Date Year

Estimated Area to be Disturbed (to the nearest quarter acre): 1.0 - 0.1

IV. SWPPP Information

Has the SWPPP been prepared in advance of filing this NOI? Yes No

Location of SWPPP for viewing: Address in Section II Address in Section III Other
If Other:

SWPPP Street: _____

City: _____

State: _____ Zip Code: _____ - _____

SWPPP Contact Information (if different than that in Section II):

Name: CYNTHIA ARDITO

Phone: _____ - _____ - _____ Fax (optional): _____ - _____ - _____

E-mail (optional): _____

V. Discharge Information

Identify the name(s) of waterbodies to which you discharge. LEANDRO CANYON

Is this discharge consistent with the assumptions and requirements of applicable EPA approved or established TMDL(s)?
 Yes No

VI. Endangered Species

Under which criterion of the permit have you satisfied your ESA eligibility obligations?

A B C D E F

- If you select criterion F, provide permit tracking number of operator under which you are certifying eligibility:

VII. Certification Information

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print Name: CYNTHIA ARDITO

Print Title: VICE PRESIDENT

Signature: CYNTHIA ARDITO

Date: JUNE 10, 2004



SUGGESTED FORMAT FOR SUBMITTING MODIFICATIONS TO A NOTICE OF INTENT (NOI) FOR STORM WATER DISCHARGES ASSOCIATED WITH CONSTRUCTION ACTIVITY UNDER AN NPDES GENERAL PERMIT. PRINT THIS SUGGESTED FORMAT ON YOUR COMPANY LETTERHEAD AND MAIL TO THE NOI PROCESSING CENTER (SEE INSTRUCTIONS FOR SUBMISSION ON PAGE 3).



A. CURRENT NOI INFORMATION (PLEASE COPY CONTENT EXACTLY FROM YOUR NOI. INDICATE CHANGES IN SECTION B BELOW)

I. Permit Tracking Number:

NMR15DH27

II. Operator Information (As it appears on your NOI):

Name: INTERA Inc.

IRS Employer Identification Number (EIN): 74 - 3010638

Mailing Address:

Street: 6501 AMERICAS PARKWAY SUITE 82

City: ALBUQUERQUE State: NM Zip Code: 87110 -

Phone: 505 - 246 - 2600

III. Project/Site Information (As it appears on your NOI):

Project/Site Name: GASBUGGY SITE

Project Street/Location: 47 MILES TO SE OF CUBA, NEW MEX

City: CUBA State: NM Zip Code: 87103 -

B. NEW NOI INFORMATION (USE THE CHECKLIST BELOW TO INDICATE THE ITEMS FOR WHICH YOU ARE SUBMITTING THE MODIFICATION)

I. Corrections to Operator Information:

Owner/Operator Telephone: - -

Owner/Operator Street Location:

Owner/Operator City:

Owner/Operator State:

Owner/Operator Zip Code: -

II. Corrections to Project/Site Information:

Project/Site Name:

Project/Site Street Location: 8 MILES S OF US64 ON FS357/J10

Latitude/Longitude (Use one of three possible formats, and specify method)

Latitude: 1. 36° 40' 43" N (degrees, minutes, seconds)
2. _____° _____' _____" N (degrees, minutes, decimal)
3. _____° N (decimal)

Longitude: 1. 107° 12' 32" W (degrees, minutes, seconds)
2. _____° _____' _____" W (degrees, minutes, decimal)
3. _____° W (decimal)

Method: U.S.G.S. topographic map EPA web site GPS Other:

• If you used a U.S.G.S. topographic map, specify the map scale:

✓ Estimated Project Start Date: 08 / 02 / 2004 Estimated Completion Date: 09 / 30 / 2004
Month Date Year Month Date Year

Estimated Area to be Disturbed (to the nearest quarter acre): .

III. Corrections to Location of SWPPP for Viewing:

SWPPP Street:

City:

State:

Zip Code: -

SWPPP Contact Person:

SWPPP Contact Phone: - -

Fax (optional): - -

E-mail (optional):

IV. Corrections to Discharge Information:

Names of Waterbodies To Which You Discharge: _____

C. FURTHER DESCRIBE WHAT YOU WANT TO MODIFY (IF APPLICABLE)

D. CERTIFICATION INFORMATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print Name: _____

Print Title: _____

Signature: _____

Date: _____

INSTRUCTIONS FOR COMPLETING A MODIFICATION TO AN EPA NOTICE OF INTENT (NOI)

You may only use this form to modify an NOI that you submitted to EPA for coverage under the Construction General Permit (CGP). If your state is authorized to implement the NPDES stormwater program, you may not use this form. For a list of states, Indian country, and territories covered by EPA's CGP, please see <http://cfpub.epa.gov/npdes/stormwater/authorizationstatus.cfm>. If you have any questions about modifying your NOI, call the Stormwater Notice Processing Center at (866) 352-7755.

When Should You Modify Your Notice of Intent (NOI)?

You can use this form to *update or correct* information on your NOI, including:

- ✓ Owner/operator address and contact information
- ✓ Site information
- ✓ Start or end dates
- ✓ Small changes to the number of acres to be disturbed (see below for further details)
- ✓ Stormwater Pollution Prevention Plan (SWPPP) location and contact information

When Must You Submit a Notice of Termination (NOT) Instead?

- ✓ **The owner/operator has changed:** You must submit a Notice of Termination (NOT) when you transfer control of a site to a new owner/operator. The new owner/operator must then file a new NOI to obtain permit coverage under EPA's CGP. Coverage is not transferable.
- ✓ **Significant changes in the land area to be disturbed:** 1.) If your original NOI indicated the acreage of land to be disturbed was between 1 and 5 acres (defined as small construction) and now your project will disturb 5 or more acres (defined as large construction), you should file an NOT to terminate your original NOI and file a new NOI for the larger project. Please note that the CGP has different provisions for small and large construction projects. 2.) If your project was 5 acres or larger (defined as large construction) and the size of the project has increased by 50% or more, you should file an NOT to terminate your original NOI and file a new NOI for the larger project.

In both cases, your new NOI will be subject to the seven day waiting period and review by the U.S. Fish and Wildlife Service and/or National Marine Fisheries Service.

Where to Submit a Modification to an NOI

Print this completed document on your company letterhead and send to

For Regular U.S. Mail Delivery:
Stormwater Notice Processing Center
U.S. EPA
1200 Pennsylvania Avenue, NW
Mail Code 4203M
Washington, DC 20460

For Overnight/Express Mail Delivery:
Stormwater Notice Processing Center
U.S. EPA
1201 Constitution Avenue, NW
Room 7420
Washington, DC 20004

Completing a Modification to an NOI

You can type directly on to this form using your computer and free Adobe Acrobat reader. You may also print a copy and type on it, if needed. Place each character between the marks (abbreviate if necessary to stay within the number of characters allowed for each item). Use only one space for breaks between words, but not for punctuation marks unless they are needed to clarify your response. If you have any questions call the EPA Notice Processing Center at (866) 352-7755.

Please submit this form with an original signature in ink – do not send a photocopy!

Section A. Current NOI Information

Copy the information exactly as it appears on your NOI.

The permit tracking number is the unique tracking number that you received in your acknowledgment letter or email. The permit tracking number is not the permit number assigned in Appendix B of the CGP. If you don't know your tracking number, call the EPA Notice Processing Center at (866) 352-7755.

Section B. New NOI Information

Put a check mark to the left of the item in this section to indicate the change(s) you are submitting. *Use this form to provide new or updated information or to correct mistakes on your NOI. Do not use this form for significant changes to your project, such as the transfer to a new owner/operator or significant changes in the scope of the project.*

Here are a couple of examples:

- ✓ Provide updated project/street location. If the project/site lacked a street address when the NOI was filed and you now have a mailing address, please provide the new information. (You cannot use this form if the project has been moved to a different location.)
- ✓ Correct latitude and longitude of the facility. If you made a mistake on your original NOI, use this form to submit the correct latitude/longitude. Refer to <http://cfpub.epa.gov/nepdes/stormwater/latlong.cfm> for more information on determining your sites latitude and longitude.
- ✓ Update construction start and/or completion date(s).
- ✓ Make small adjustments in the acreage to be disturbed. Please note that significant changes in the size of the project will require filing a new NOI. See discussion above for more details.

Section C. Further Describe in Detail What You Want to Modify (if applicable)

You can use this area to explain your changes or submit a change that does not appear elsewhere on this form.

Section D. Certification Information

This must be signed and certified, as follows:

1. For a corporation: By a responsible corporate officer. For the purpose of this Part, a responsible corporate officer means:
 - (i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or
 - (ii) the manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
2. For a partnership or sole proprietorship: By a general partner or the proprietor, respectively; or
3. For a municipality, state, federal, or other public agency: By either a principal executive officer or ranking elected official. For purposes of this Part, a principal executive officer of a federal agency includes
 - (i) the chief executive officer of the agency, or
 - (ii) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrator of EPA).

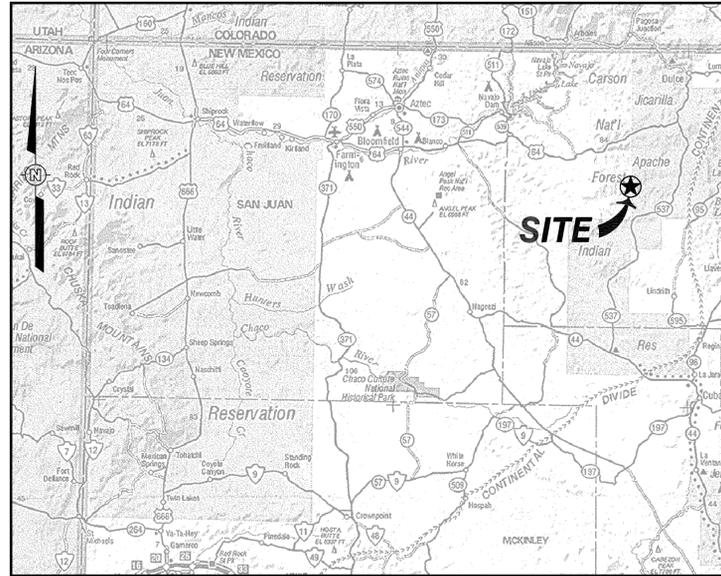
Include the name and title of the certifier and the date signed. An unsigned or undated document will not be accepted.

Please submit this form with an original signature in ink – do not send a photocopy!

APPENDIX B

AS-BUILT DRAWINGS





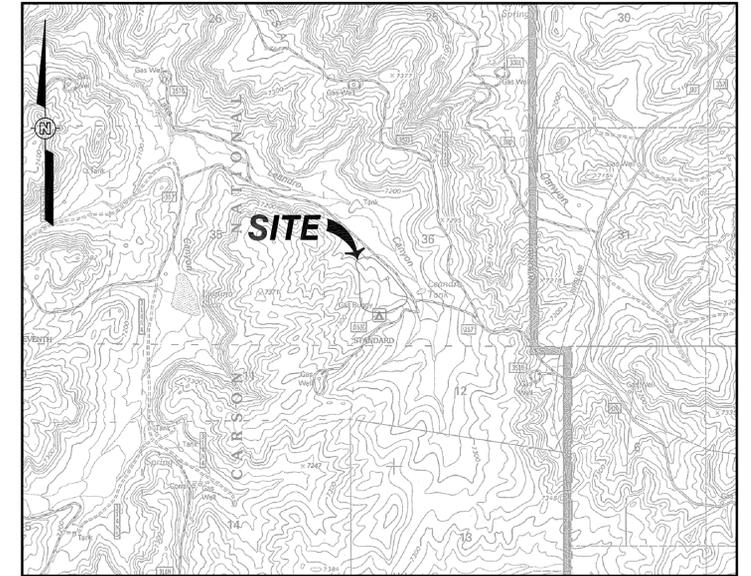
REFERENCE:
MAP TAKEN FROM AAA STATE SERIES
ROADWAY MAP TITLED: ARIZONA/NEW
MEXICO, DATED: 12/02-3/04.

SITE VICINITY MAP

SCALE
0 4 8 MILES

INDEX OF DRAWINGS

SNJV DRAWING NUMBER	SHEET REFERENCE NUMBER	DESCRIPTION
GBCAT1	T-1	TITLE SHEET
GBCASGZ-A1	A-1	SITE LAYOUT WITH DESIGN PIT BOUNDARIES - SURFACE GROUND ZERO
GBCAGBD-A2	A-2	SITE LAYOUT WITH DESIGN PIT BOUNDARY - WELL GB-D AREA
GBCASGZ-A3	A-3	SITE LAYOUT WITH AS-BUILT PIT BOUNDARIES - SURFACE GROUND ZERO
GBCAGBD-A4	A-4	SITE LAYOUT WITH AS-BUILT PIT BOUNDARY - WELL GB-D AREA
GBCADWZ-A5	A-5	DESIGNATED WORK ZONES AT SURFACE GROUND ZERO
GBCADWZ-A6	A-6	AS-BUILT DETAILS
GBCAMPD-A7	A-7	SOIL SAMPLE LOCATION AND MUD PIT DETAIL
GBCAXSCT-A8	A-8	EXCAVATION CROSS-SECTIONS
GBCASGZ-A9	A-9	AS-BUILT FINAL TOPOGRAPHY - SURFACE GROUND ZERO
GBCAGBD-A10	A-10	AS-BUILT FINAL TOPOGRAPHY - WELL GB-D AREA



REFERENCE:
TOPOGRAPHIC MAP TAKEN FROM U.S.G.S.
LEANDRO CANYON QUADRANGLE, 7.5
MINUTE SERIES TOPOGRAPHIC MAP,
DATED: 1995, SCALE: 1"=2000'.

SITE LOCATION MAP

SCALE
0 2000 4000 FEET

MUD PIT AS-BUILT PLANS

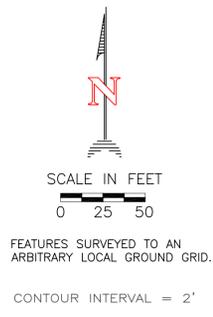
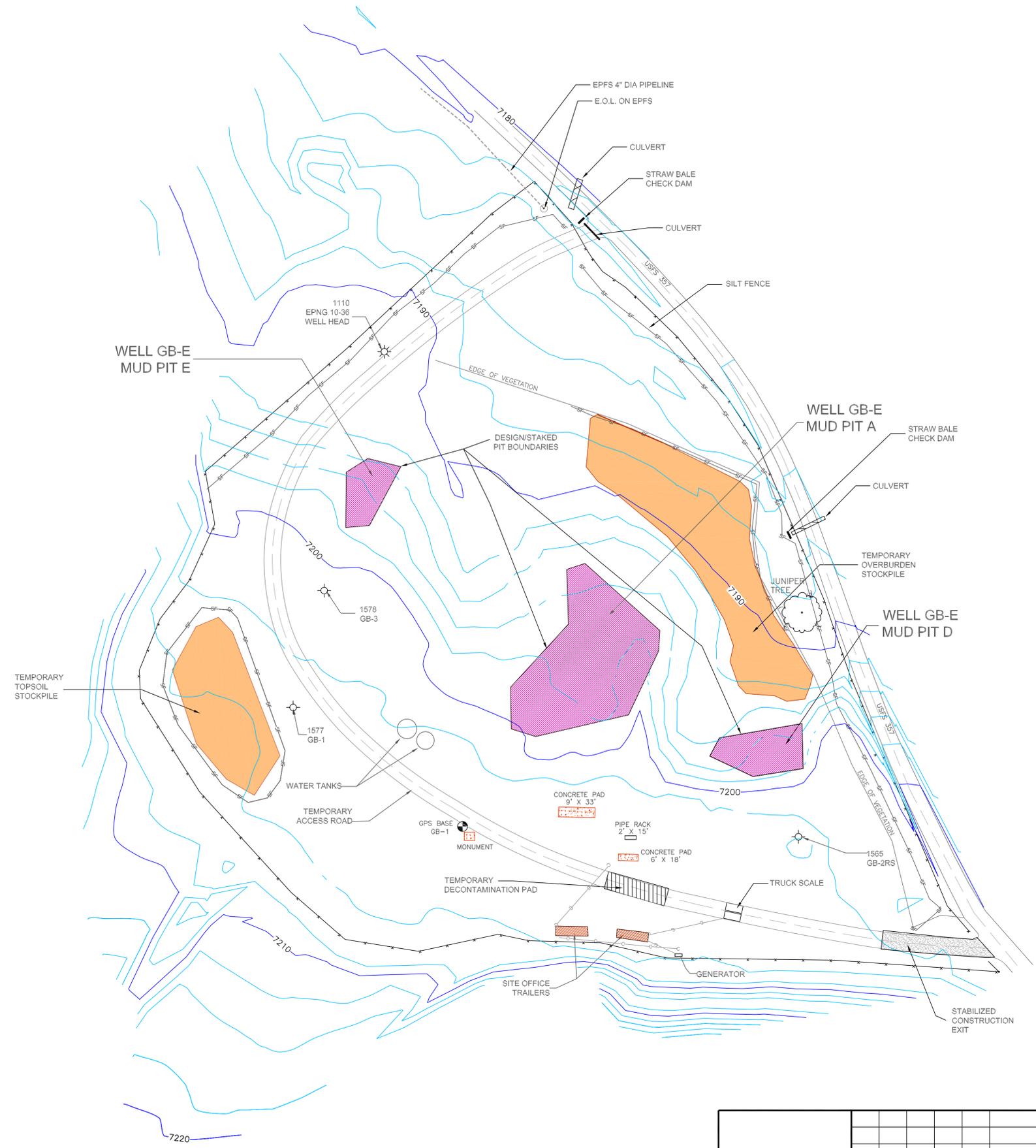
GASBUGGY CORRECTIVE ACTION
SURFACE GROUND ZERO AND WELL GB-D AREA
RIO ARRIBA COUNTY, NEW MEXICO



PREPARED FOR
**NATIONAL NUCLEAR
SECURITY ADMINISTRATION
NEVADA SITE OFFICE**

 STOLLER-NAVARRO Battle • INTERA • Weapon Solutions		NATIONAL NUCLEAR SECURITY ADMINISTRATION NEVADA SITE OFFICE			
		TITLE SHEET GASBUGGY CORRECTIVE ACTION SURFACE GROUND ZERO AND GB-D AREA RIO ARRIBA COUNTY, NEW MEXICO			
DESIGNED BY	-	CHECKED BY			
DRAWN BY		APPROVED BY	22 Oct 04		
SCALE:	AS SHOWN	DRAWING NO.	GBCAT1.dwg	SHEET NO.	T-1
				REVISION NO.	0

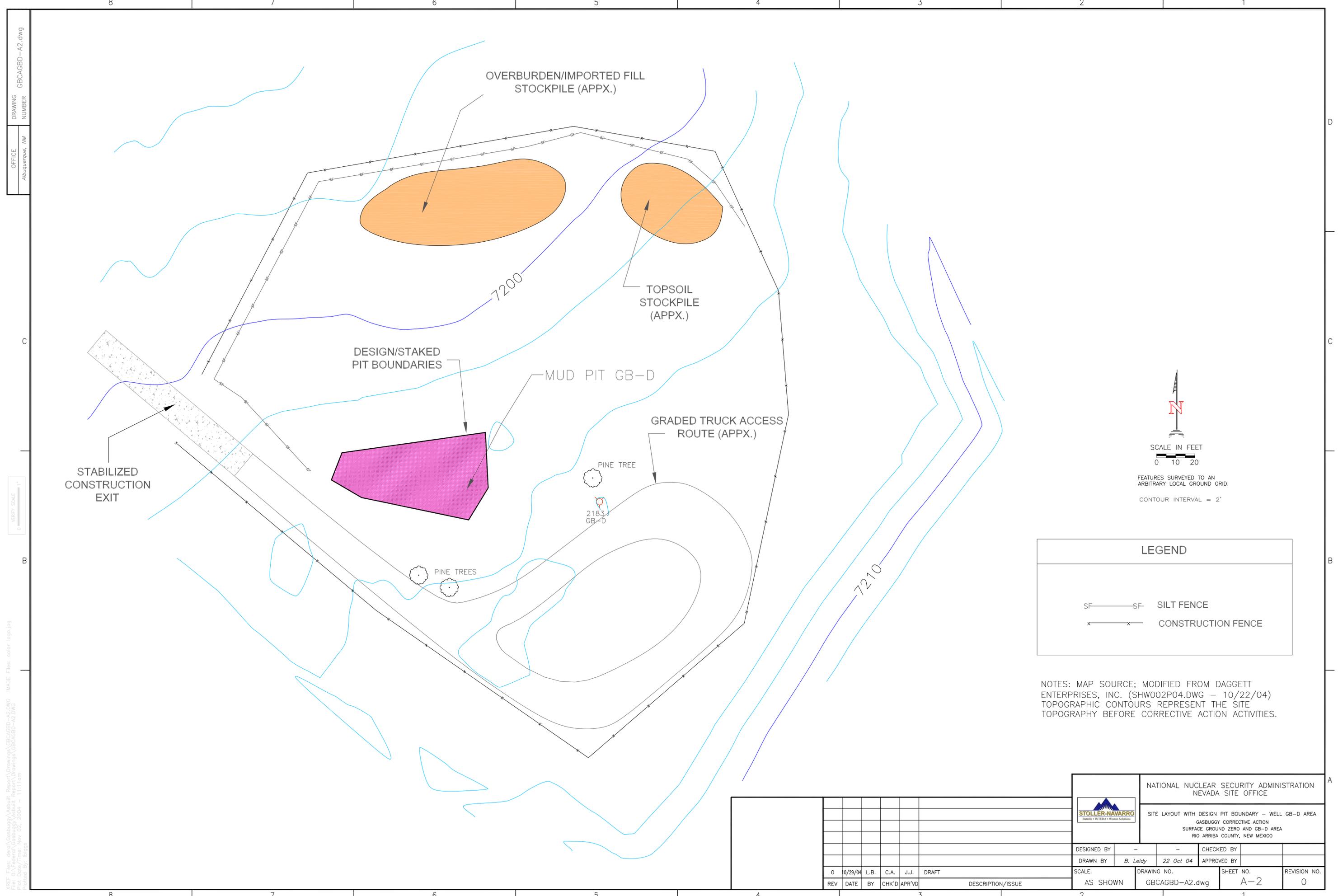
REV	DATE	BY	CHK'D	APR'VD	DESCRIPTION/ISSUE
0	11/02/04	L.B.	C.A.	J.J.	DRAFT



LEGEND	
	BURRIED GAS LINE END OF LINE (E.O.L.)
	BURRIED POWER LINE
	SILT FENCE
	CONSTRUCTION FENCE
	CENTERLINE ROAD
	WELL HEAD
	WELL MARKER

NOTES: MAP SOURCE; MODIFIED FROM DAGGETT ENTERPRISES, INC. (SHW002P01 - 10/22/04). EPFS = EL PASO FIELD SERVICES. TOPOGRAPHIC CONTOURS REPRESENT THE SITE TOPOGRAPHY BEFORE CORRECTIVE ACTION ACTIVITIES.

		NATIONAL NUCLEAR SECURITY ADMINISTRATION NEVADA SITE OFFICE			
		SITE LAYOUT WITH DESIGN PIT BOUNDARIES - SURFACE GROUND ZERO GASBUGGY CORRECTIVE ACTION SURFACE GROUND ZERO AND GB-D AREA RIO ARRIBA COUNTY, NEW MEXICO			
DESIGNED BY	-	-	CHECKED BY		
DRAWN BY	B. Leidy	22 Oct 04	APPROVED BY		
SCALE:	AS SHOWN	DRAWING NO.	GBCASGZ-A1.dwg	SHEET NO.	A-1
REV	DATE	BY	CHK'D	APR'VD	DESCRIPTION/ISSUE
0	10/28/04	L.B.	C.A.	J.J.	DRAFT



DRAWING NUMBER: GBCAGBD-A2.dwg

OFFICE: Albuquerque, NM

VERIFY SCALE: 1" = 20'

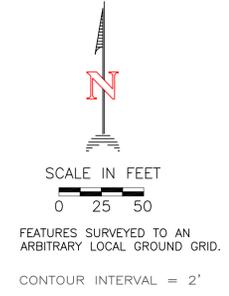
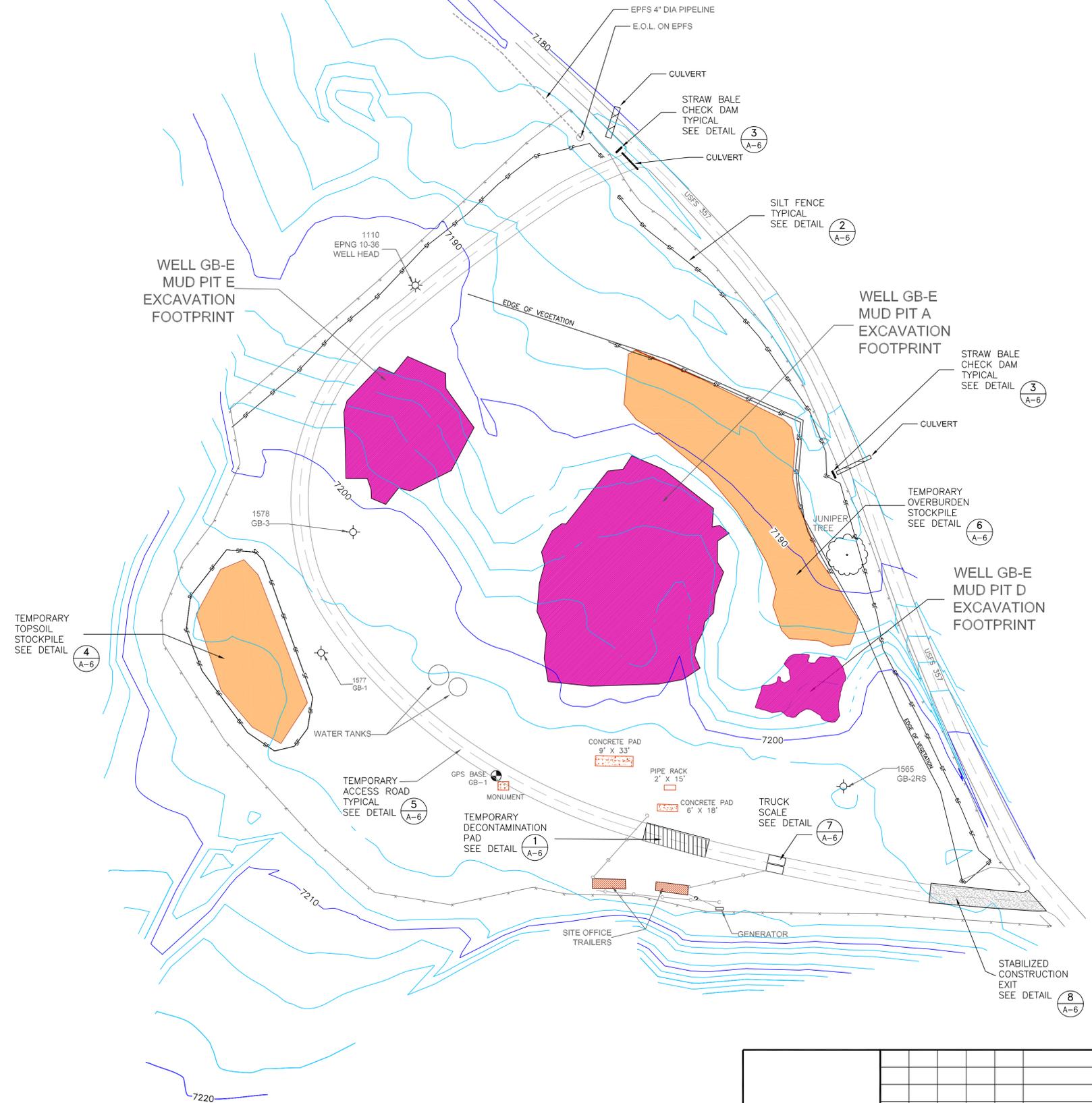
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 Plot Date/Time: Nov 02, 2004 - 11:11am
 Printed by: thpgr

SCALE IN FEET
 0 10 20
 FEATURES SURVEYED TO AN
 ARBITRARY LOCAL GROUND GRID.
 CONTOUR INTERVAL = 2'

LEGEND	
SF ——— SF	SILT FENCE
x ——— x	CONSTRUCTION FENCE

NOTES: MAP SOURCE; MODIFIED FROM DAGGETT ENTERPRISES, INC. (SHW002P04.DWG - 10/22/04)
 TOPOGRAPHIC CONTOURS REPRESENT THE SITE TOPOGRAPHY BEFORE CORRECTIVE ACTION ACTIVITIES.

 STOLLER-NAVARRO <small>Statewide • INTERA • Wireless Solutions</small>		NATIONAL NUCLEAR SECURITY ADMINISTRATION NEVADA SITE OFFICE			
SITE LAYOUT WITH DESIGN PIT BOUNDARY - WELL GB-D AREA GASBUGGY CORRECTIVE ACTION SURFACE GROUND ZERO AND GB-D AREA RIO ARRIBA COUNTY, NEW MEXICO		DESIGNED BY: -		CHECKED BY: -	
DRAWN BY: <i>B. Leidy</i>		DATE: 22 Oct 04		APPROVED BY: -	
SCALE: AS SHOWN		DRAWING NO. GBCAGBD-A2.dwg		SHEET NO. A-2	
REVISION NO. 0		DATE: 10/29/04		BY: L.B. C.A. J.J.	
REV		DATE		DESCRIPTION/ISSUE	
0		10/29/04		L.B. C.A. J.J. DRAFT	



LEGEND	
---	BURIED GAS LINE
⊙	END OF LINE (E.O.L.)
—○—	BURIED POWER LINE
SF—SF	SILT FENCE
—x—x—	CONSTRUCTION FENCE
---	CENTERLINE ROAD
☀	WELL HEAD
⊙	WELL MARKER

NOTES: MAP SOURCE; MODIFIED FROM DAGGETT ENTERPRISES, INC. (SHW002P02.DWG - 10/22/04). EPFS = EL PASO FIELD SERVICES. TOPOGRAPHIC CONTOURS REPRESENT THE SITE TOPOGRAPHY BEFORE CORRECTIVE ACTION ACTIVITIES.

		NATIONAL NUCLEAR SECURITY ADMINISTRATION NEVADA SITE OFFICE			
		SITE LAYOUT WITH AS-BUILT PIT BOUNDARIES - SURFACE GROUND ZERO GASBUGGY CORRECTIVE ACTION SURFACE GROUND ZERO AND GB-D AREA RIO ARRIBA COUNTY, NEW MEXICO			
DESIGNED BY	-	-	CHECKED BY		
DRAWN BY	B. Leidy	22 Oct 04	APPROVED BY		
SCALE:	AS SHOWN	DRAWING NO.	GBCASGZ-A3.dwg	SHEET NO.	A-3
REV	DATE	BY	CHK'D	APR'VD	DESCRIPTION/ISSUE
0	10/28/04	L.B.	C.A.	J.J.	DRAFT



N
SCALE IN FEET
0 10 20
FEATURES SURVEYED TO AN
ARBITRARY LOCAL GROUND GRID.
CONTOUR INTERVAL = 2'

LEGEND	
SF ——— SF	SILT FENCE
X ——— X	CONSTRUCTION FENCE

NOTES: MAP SOURCE; MODIFIED FROM DAGGETT ENTERPRISES, INC. (SHW002P05.DWG - 10/22/04). TOPOGRAPHIC CONTOURS REPRESENT THE SITE TOPOGRAPHY BEFORE CORRECTIVE ACTION ACTIVITIES.

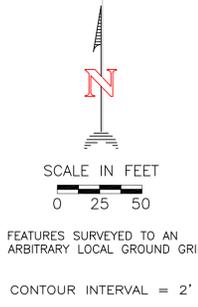
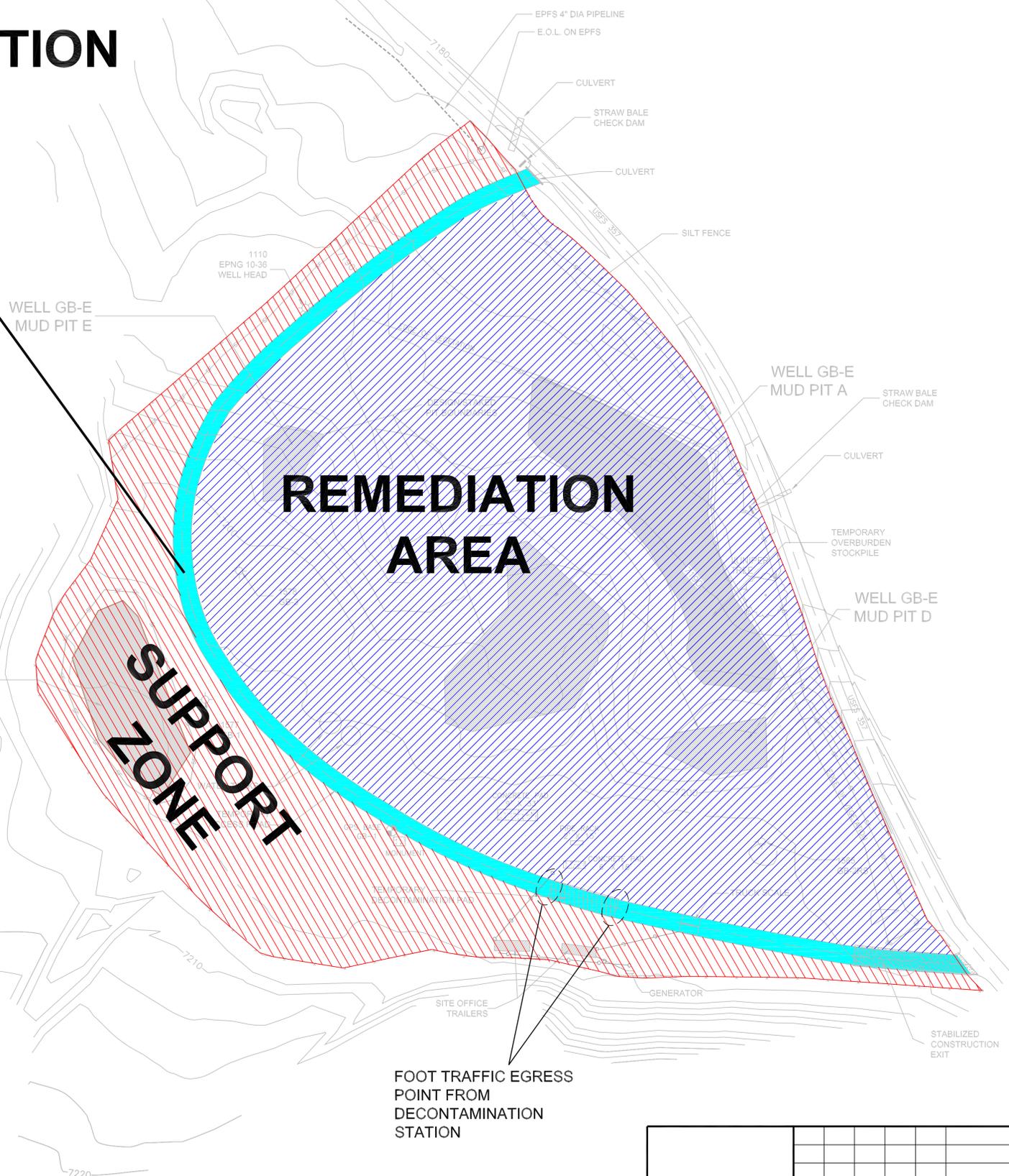
				NATIONAL NUCLEAR SECURITY ADMINISTRATION NEVADA SITE OFFICE			
				SITE LAYOUT WITH AS-BUILT BOUNDARY - WELL GB-D AREA GASBUGGY CORRECTIVE ACTION SURFACE GROUND ZERO AND GB-D AREA RIO ARRIBA COUNTY, NEW MEXICO			
DESIGNED BY	-	-	CHECKED BY				
DRAWN BY	B. Leidy	22 Oct 04	APPROVED BY				
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REV	DATE	BY	CHK'D	APPR'VD	DESCRIPTION/ISSUE		
0	10/29/04	L.B.	C.A.	J.J.	DRAFT		

DECONTAMINATION STATION

GBCADWZ-A5.dwg
DRAWING NUMBER
OFFICE Albuquerque, NM

VERIFY SCALE
0 1" = 100'

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Plotted By: lbriggs

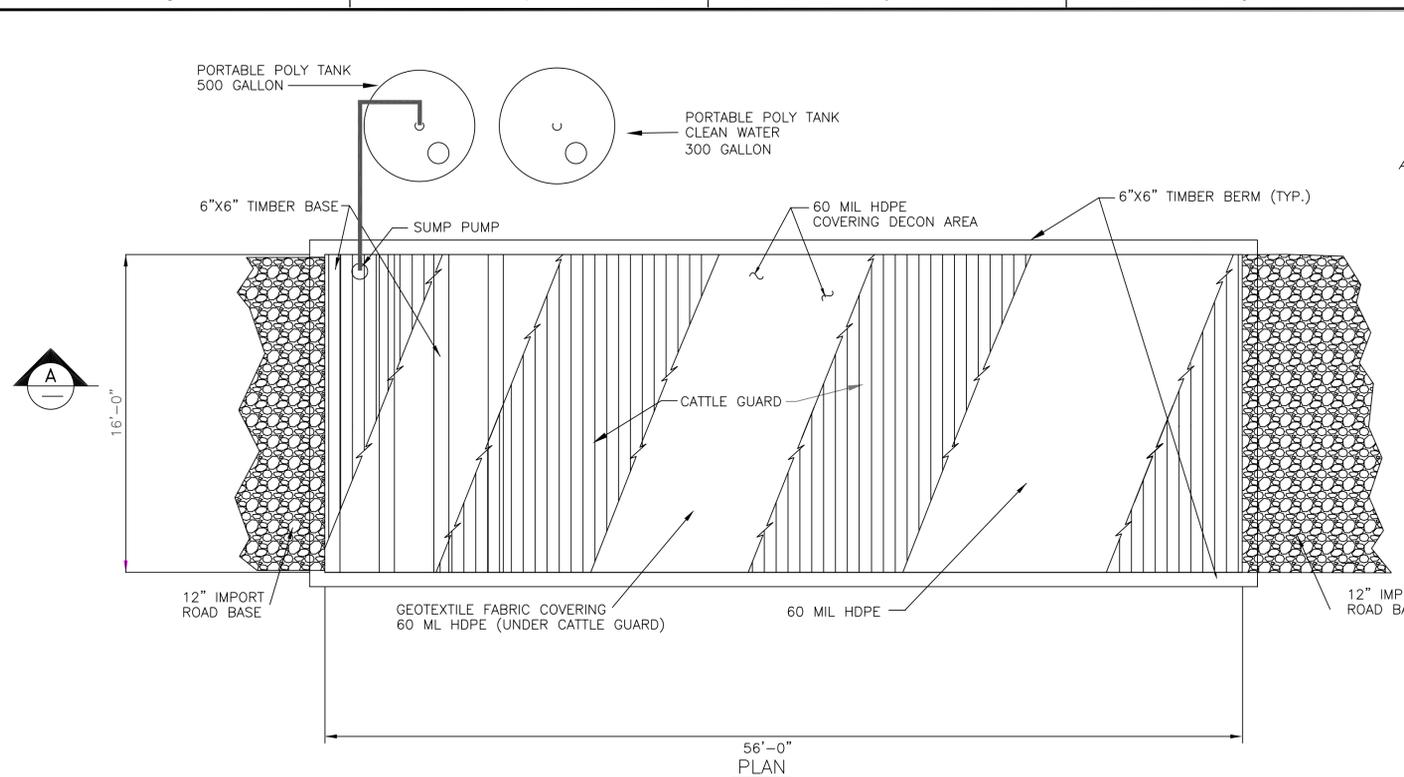


LEGEND	
---	BURRIED GAS LINE
⊙	END OF LINE (E.O.L.)
—○—	BURRIED POWER LINE
SF—SF	SILT FENCE
x—x	CONSTRUCTION FENCE
—	CENTERLINE ROAD
☀	WELL HEAD
⊙	WELL MARKER

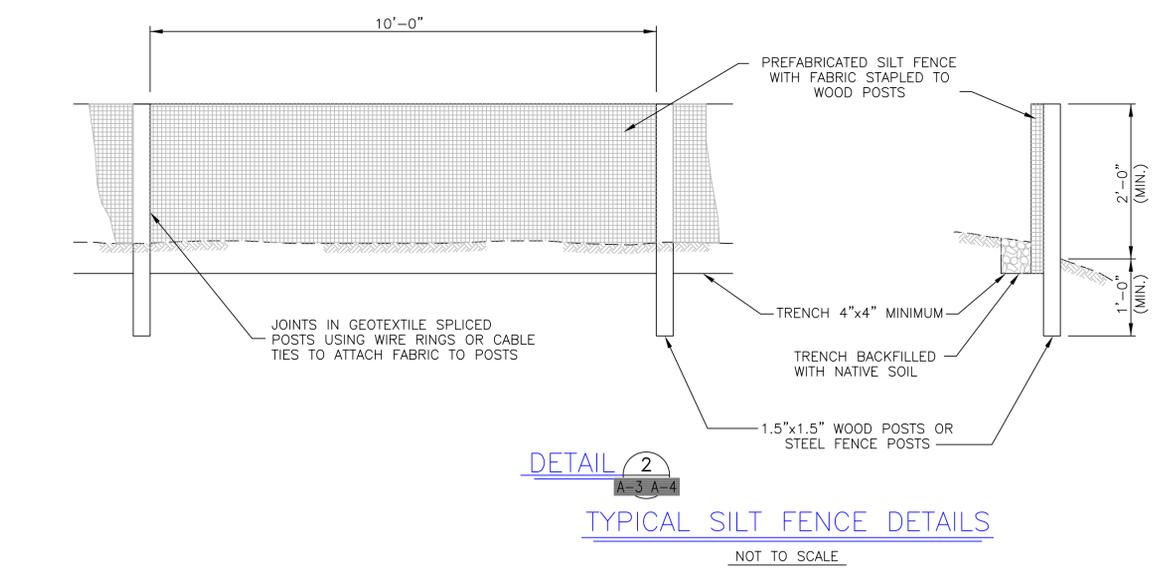
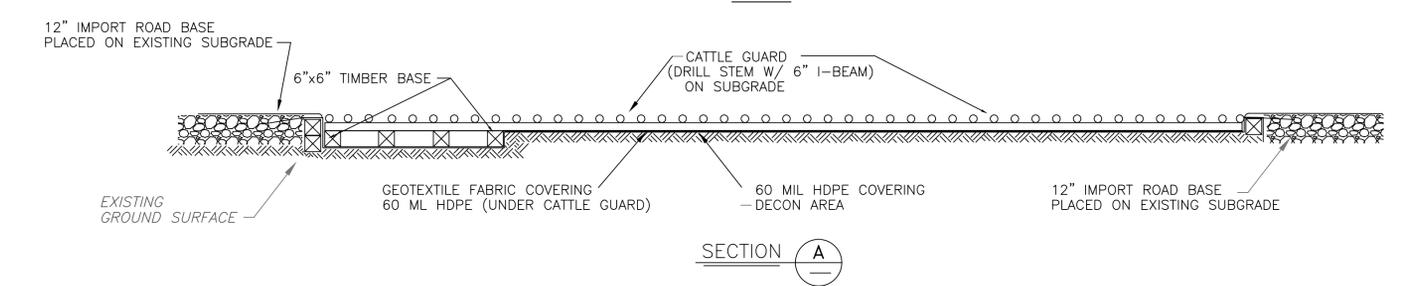
NOTES: MAP SOURCE; MODIFIED FROM DAGGETT ENTERPRISES, INC. (SHW002P01.DWG - 10/22/04. EPFS = EL PASO FIELD SERVICES. TOPOGRAPHIC CONTOURS REPRESENT THE SITE TOPOGRAPHY BEFORE CORRECTIVE ACTION ACTIVITIES.

FOOT TRAFFIC EGRESS POINT FROM DECONTAMINATION STATION

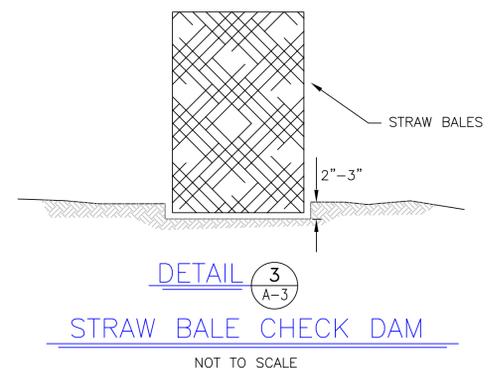
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				DESIGNATED WORK ZONES AT SURFACE GROUND ZERO GASBUGGY CORRECTIVE ACTION SURFACE GROUND ZERO AND GB-D AREA RIO ARriba COUNTY, NEW MEXICO			
DESIGNED BY	—	—	CHECKED BY				
DRAWN BY	B. Leidy	22 Oct 04	APPROVED BY				
SCALE:	AS SHOWN	DRAWING NO.	GBCADWZ-A5.dwg	SHEET NO.	A-5		
REV	DATE	BY	CHK'D	APR'VD	DESCRIPTION/ISSUE		
0	10/28/04	L.B.	C.A.	J.J.	DRAFT		



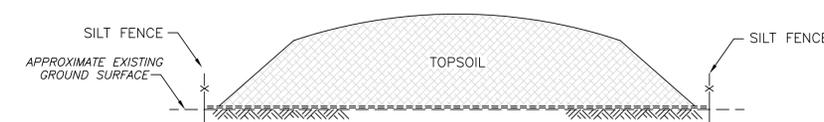
DETAIL 1
 A-3
TEMPORARY DECONTAMINATION PAD
 NOT TO SCALE



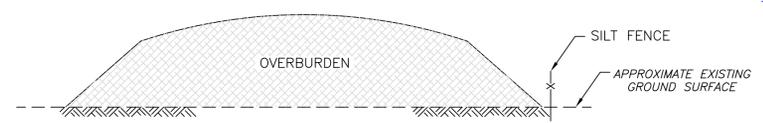
DETAIL 2
 A-3 A-4
TYPICAL SILT FENCE DETAILS
 NOT TO SCALE



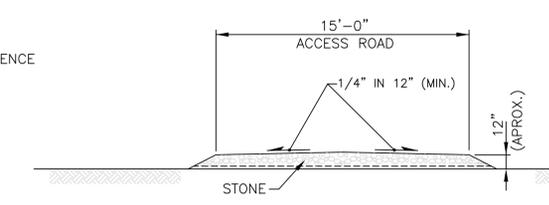
DETAIL 3
 A-3
STRAW BALE CHECK DAM
 NOT TO SCALE



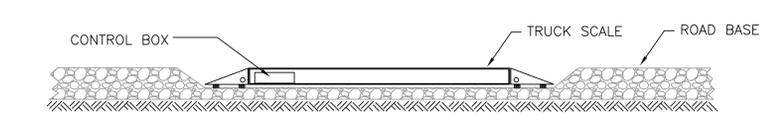
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 A-3
TEMPORARY TOPSOIL STOCKPILE DETAIL
 NOT TO SCALE



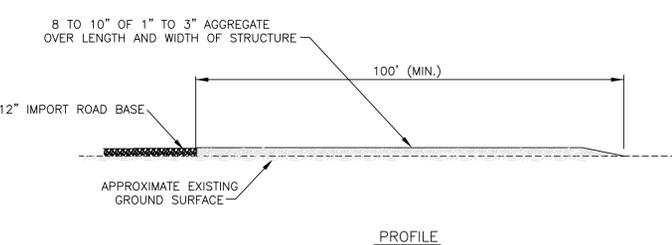
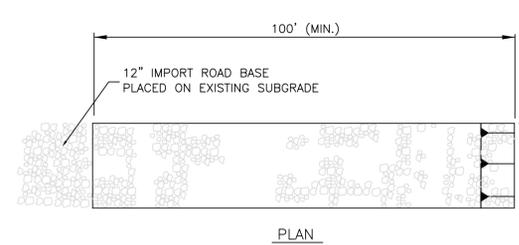
DETAIL 6
 A-3
TEMPORARY OVERBURDEN STOCKPILE DETAIL
 NOT TO SCALE



DETAIL 5
 A-3
TYPICAL ACCESS ROAD SECTION
 NOT TO SCALE



DETAIL 7
 A-3
TRUCK SCALE
 NOT TO SCALE

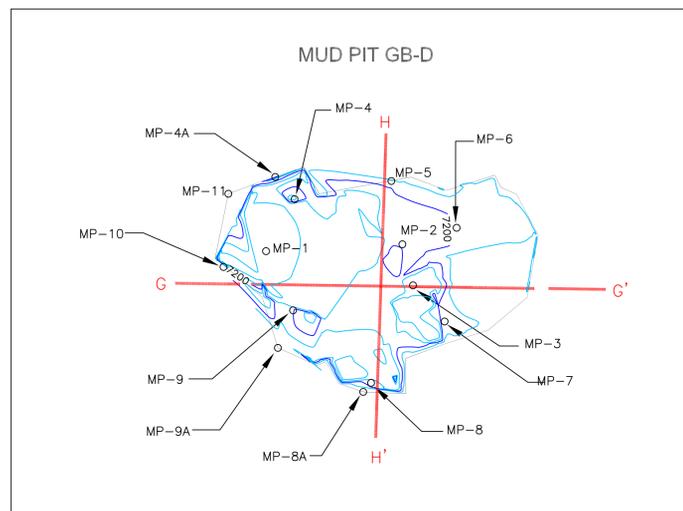
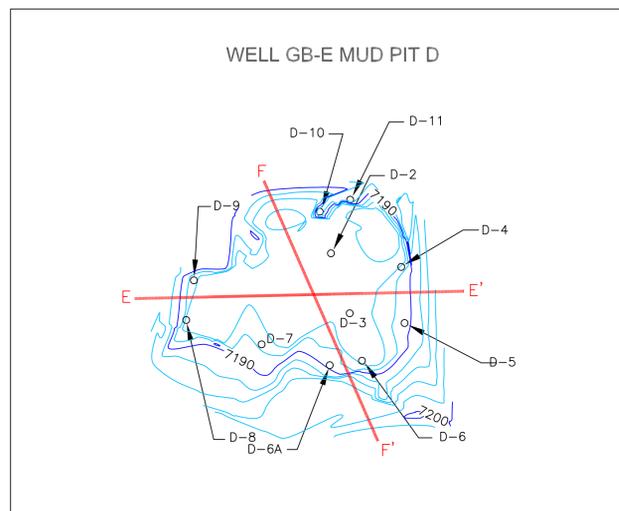
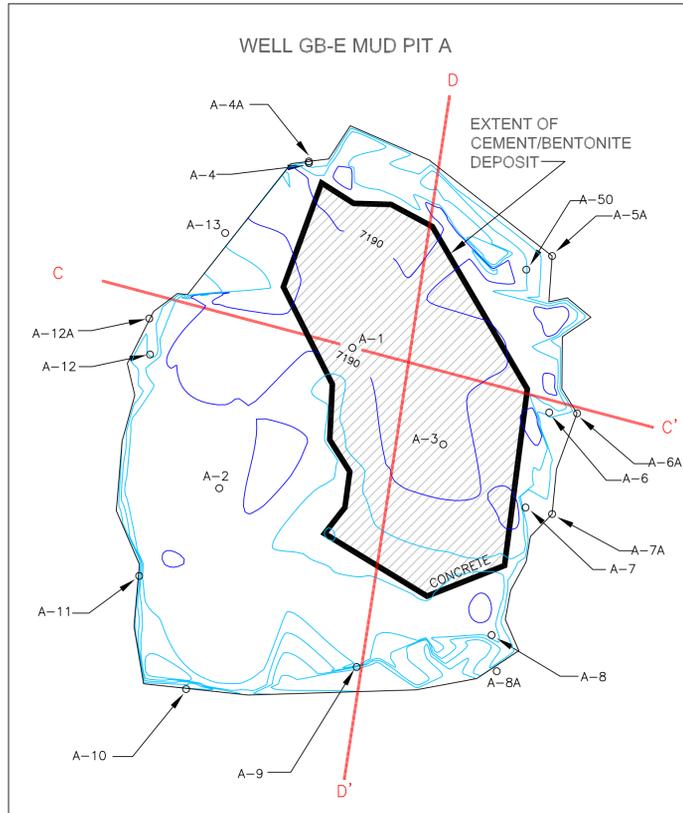
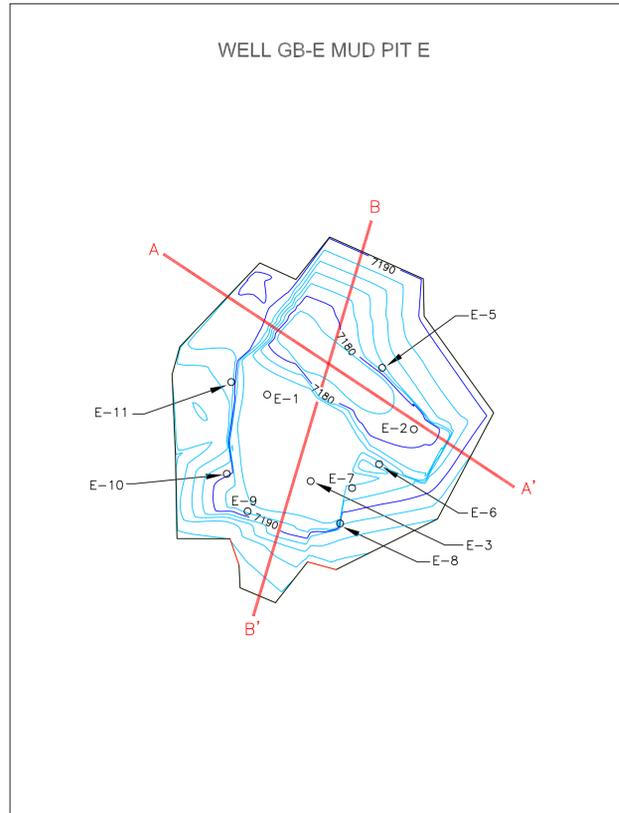


DETAIL 8
 A-3 A-4
STABILIZED CONSTRUCTION EXIT
 NOT TO SCALE

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 Plot Date/Time: Nov 02, 2004 - 11:04am
 Plotted By: ibiggs

REV	DATE	BY	CHK'D	APR'VD	DESCRIPTION/ISSUE
0	5/29/04	L.B.	C.A.	J.J.	DRAFT

		NATIONAL NUCLEAR SECURITY ADMINISTRATION NEVADA SITE OFFICE			
		AS-BUILT DETAILS GASBUGGY CORRECTIVE ACTION SURFACE GROUND ZERO AND GB-D AREA RIO ARRIBA COUNTY, NEW MEXICO			
DESIGNED BY	-	-	CHECKED BY	-	-
DRAWN BY	K. Clark	22 Oct 04	APPROVED BY	-	-
SCALE:	AS SHOWN	DRAWING NO.	GBCADET-A6.dwg	SHEET NO.	A-6
REV	DATE	BY	CHK'D	APR'VD	DESCRIPTION/ISSUE
0	5/29/04	L.B.	C.A.	J.J.	DRAFT



NOTE: SEE SHEET A-8 FOR CROSS SECTION DETAILS.

SOIL SAMPLE LOCATIONS

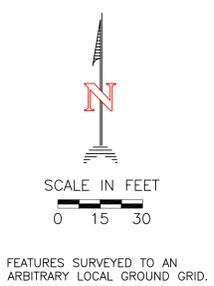
WELL GB-E MUD PIT A		
SAMPLE ID	NORTHING	EASTING
A-1	2066903.664	219245.2389
A-2	2066853.572	219198.7943
A-3	2066870.05	219277.8379
A-4	2066968.492	219228.9993
A-4A	2066969.082	219228.969
A-5	2066931.976	219306.4179
A-5A	2066936.891	219315.4981
A-6	2066881.773	219315.197
A-6A	2066881.587	219325.0452
A-7	2066848.178	219307.2333
A-7A	2066846.017	219316.6707
A-8	2066803.108	219295.8195
A-8A	2066790.401	219297.804
A-9	2066791.229	219248.2146
A-10	2066782.69	219187.9685
A-11	2066822.317	219170.861
A-12	2066900.35	219173.6696
A-12A	2066913.015	219173.2348
A-13	2066943.489	219199.7019

WELL GB-E MUD PIT D		
SAMPLE ID	NORTHING	EASTING
D-2	2066792.253	219406.0671
D-3	2066771.234	219412.9888
D-4	2066787.772	219431.0001
D-5	2066768.031	219432.4315
D-6	2066754.552	219417.5295
D-6A	2066752.815	219406.1749
D-7	2066759.879	219381.9589
D-8	2066768.097	219355.1552
D-9	2066782.098	219357.6859
D-10	2066806.879	219401.903
D-11	2066811.229	219412.6227

WELL GB-E MUD PIT E		
SAMPLE ID	NORTHING	EASTING
E-1	2067009.881	219025.1753
E-2	2066998.353	219077.2211
E-3	2066979.627	219040.9558
E-5	2067019.877	219065.7483
E-6	2066985.914	219065.1087
E-7	2066977.382	219055.6361
E-8	2066964.852	219051.5623
E-9	2066968.702	219018.7691
E-10	2066981.801	219011.2478
E-11	2067014.159	219012.4215

MUD PIT GB-D		
SAMPLE ID	NORTHING	EASTING
M-1	2065770.795	220165.4681
M-2	2065773.846	220213.676
M-3	2065759.429	220217.6262
M-4	2065789.237	220175.3235
M-4A	2065796.978	220168.3915
M-5	2065796.068	220209.4779
M-6	2065779.891	220232.7904
M-7	2065746.849	220228.9657
M-8	2065724.89	220203.2376
M-8A	2065721.665	220200.4967
M-9	2065750.07	220175.2971
M-9A	2065736.781	220170.1166
M-10	2065765.021	220150.4947
M-11	2065790.824	220151.8665

SURVEY LOCATIONS SHOWN IN COORDINATES OF NEW MEXICO STATE PLANE CENTRAL, NAD27

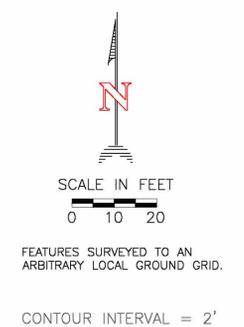
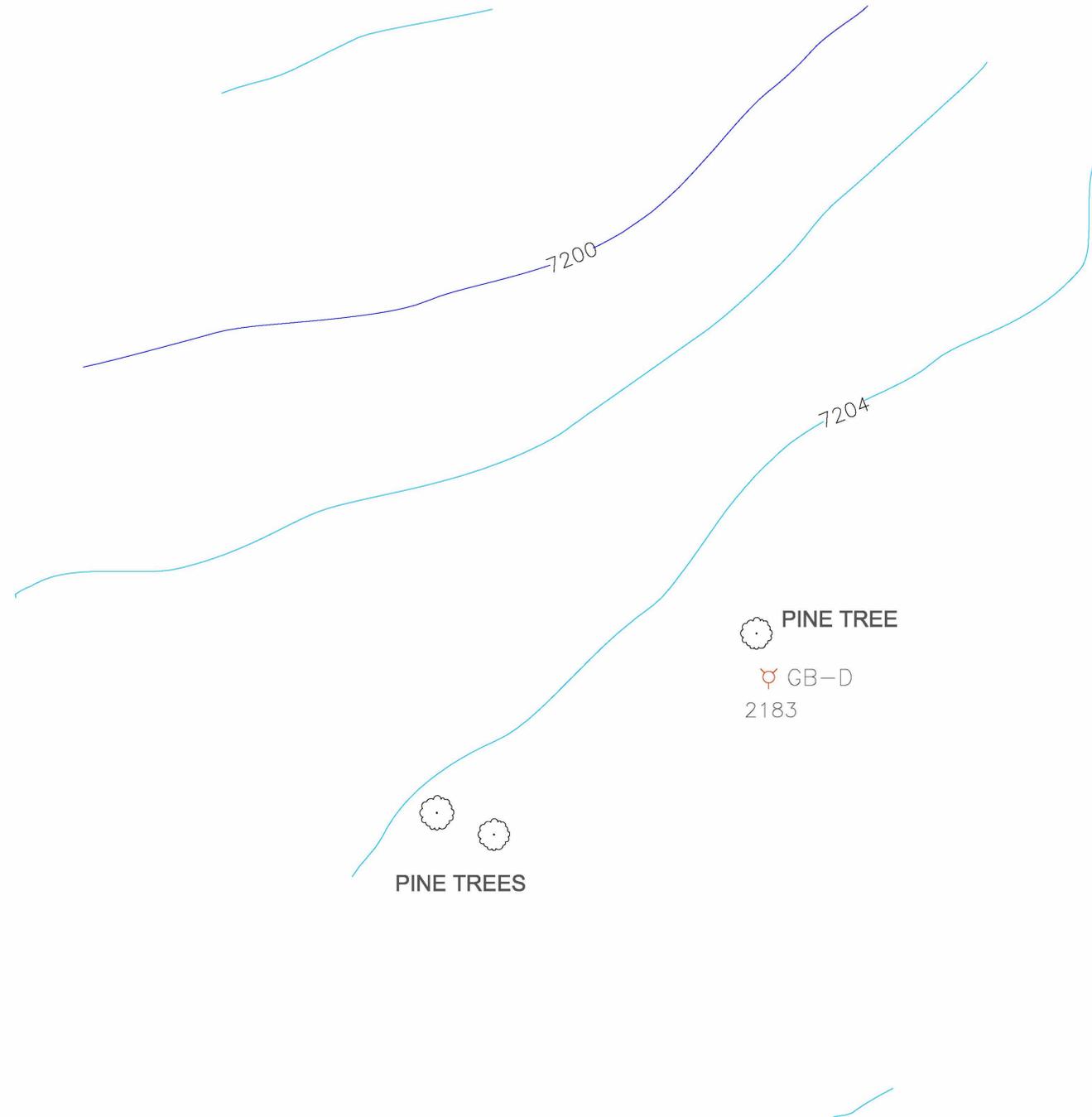


NOTES: MAP SOURCE; MODIFIED FROM DAGGETT ENTERPRISES, INC. (SHW002P03.DWG - 10/22/04). CONTOURS REPRESENT TOPOGRAPHY OF THE PITS AFTER EXCAVATION OF CONTAMINATED MATERIALS AND BEFORE BACKFILL OF PITS.

		NATIONAL NUCLEAR SECURITY ADMINISTRATION NEVADA SITE OFFICE			
		SOIL SAMPLE LOCATION AND MUD PIT DETAIL GASBUGGY CORRECTIVE ACTION SURFACE GROUND ZERO AND GB-D AREA RIO ARRIBA COUNTY, NEW MEXICO			
DESIGNED BY	-	CHECKED BY	-	DRAWN BY	B. Leidy
DATE	10/29/04	APPROVED BY	22 Oct 04	SHEET NO.	A-7
SCALE:	AS SHOWN	DRAWING NO.	GBCAMPD-A7.dwg	REVISION NO.	0

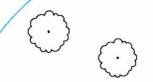
REV	DATE	BY	CHK'D	APR'VD	DESCRIPTION/ISSUE
0	10/29/04	L.B.	C.A.	J.J.	DRAFT

DRAWING NUMBER
 GBCAGBD-A10.dwg
 OFFICE
 Albuquerque, NM



NOTES: MAP SOURCE; MODIFIED FROM DAGGETT ENTERPRISES, INC. (SHW002A02.DWG - 10/18/04). TOPOGRAPHIC CONTOURS REPRESENT THE AS-BUILT SITE TOPOGRAPHY OF THE WELL GB-D AREA.

 PINE TREE
 GB-D
 2183


 PINE TREES

XREF Files: d:\ref\Castroville\Asbuilt - Report\Drawings\GBCAGBD-A10.DWG
 Plot Date/Time: Nov 02, 2004 - 11:05am
 Plotted By: ibiggs

 STOLLER-NAVARRO <small>Build it • Enter it • Maintain it</small>		NATIONAL NUCLEAR SECURITY ADMINISTRATION NEVADA SITE OFFICE			
		AS-BUILT FINAL TOPOGRAPHY - WELL GB-D AREA GASBUGGY CORRECTIVE ACTION SURFACE GROUND ZERO AND GB-D AREA RIO ARRIBA COUNTY, NEW MEXICO			
DESIGNED BY	-	-	CHECKED BY		
DRAWN BY	B. Leidy	22 Oct 04	APPROVED BY		
SCALE:	AS SHOWN	DRAWING NO.	GBCAGBD-A10.dwg	SHEET NO.	A-10
REVISION	0	10/29/04	L.B.	C.A.	J.J.
REV	DATE	BY	CHK'D	APR'VD	DESCRIPTION/ISSUE

APPENDIX C

BILLS OF LADING



LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	^{total} lbs weight	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy Well GB-E mudpit E	LF#2	Drilling mud soil	A-23	18	74700	Russom Trkg	1	8:58	Ron Russom
	74,700 lbs	8:58 am	George Echelon							
1	Gasbuggy Well GB-E mudpit E	LF#2	Drilling mud	A-23	18	82900	Russom Trkg	1	1:00	Ron Russom
	82,900 lbs	10:55	George Echelon							
1	Gasbuggy Well GB-E mudpit E	LF#2	Drilling mud	A-23	18	80160	Russom Trkg	1	4:35	Ron Russom
	80160 lbs	14:49	George Echelon							

3766

ENTERED AUG 2 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Ron Russom

COMPANY Russom Trucking, Inc.

SIGNATURE Ron Russom

DATE 8/16/04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	ESTIMATED WEIGHT	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gas Buggy Well 16-E	LF # 2	soil	B-22	18	8560	Russom Trucking	4	9:05	Richard Russom
	86500#	9:05	generator							
1	Gas buggy Well 16-E	LP # 2	generator	A-22	18		Richard Russom	4	1:00	
	79520 lbs	11:00	generator							
1	Gas buggy Well 16-E mudpite	LP # 2	soil	A-22	18		Richard Russom	4	4:45	
	81080 lbs	14:54	generator							
										3766

ENTERED AUG 21 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Richard Russom COMPANY Russom Trucking Inc. SIGNATURE Richard Russom

DATE 8-16-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gashbuggy Well GB-E mudpit # # 75900 lbs	LF#2 time 8:37	Drilling mud sign [Signature]	A-20	18		Envirotech	519	10:30	[Signature]
2	Gashbuggy Well GB-E mudpit #	LF#2 time	Drilling mud sign							[Signature]
2	Gashbuggy Well GB-E mudpit # # 72840	LF#2 time 11:55	Drilling mud sign [Signature]							[Signature]
2 Loads today						X18				

✓ 3754
ENTERED AUG 18 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME [Signature] COMPANY Envirotech Inc SIGNATURE [Signature]

DATE 08-17-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gashbuggy well GB-E mudpit # 77640 (92) ^{time}	LF#2 8.13	Drilling mud ^{sign} generally ^{driver}	A23	18			558		
1	Gashbuggy well GB-E mudpit # 77640 ^{time}	LF#2 11.49	Drilling mud ^{sign} generally ^{driver}	A23	18			558		
										3768

ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME Neil Winter COMPANY Envirotech SIGNATURE [Signature]

 DATE 8-17-04

Bill of Lading

MANIFEST # 21661

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08-17-04 JOB # 04118-001

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbugay well GB-E mudpit D #74020	LF#2 7:38	Drilling mud sign glassore drive	A-22	298		Inland Co	17	9:20	Benny W
1	Gasbugay well GB-E mudpit D #79840	LF#2 11:25	Drilling mud sign glassore drive	A-24	298		Inland Co	17	1:10	Benny W
	2 lds 18 yds	Clear soil		JH						
										✓ 3754

ENTERED AUG 18 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Benny W COMPANY Inland Co SIGNATURE Benny W
Benny W
 DATE 8/17/04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GB-E mud pit D # 76840	LF #2 7:28	Drilling mud Koblar	A-21	298		Inland	14	9:30	Mark Bennett
1	Gasbuggy well GB-E mud pit D # 79006	LF #2 11:15	Drilling mud Koblar	A-22	2078		Inland	14	1:00	Mark Bennett
	2 lbs 18 yds	Clean Soil	JH							
										✓ 3754

ENTERED AUG 18 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME MARK BENNETT COMPANY Inland SIGNATURE Mark Bennett

 DATE 8/18/04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well G-B-E mvd pit D	LF#2	Drilling mud	A-21	2078		MMI	499		Jerry Montoya
	78380 lbs	6:49	Gasbuggy							Jerry Montoya
2	Gasbuggy well G-B-E mvd pit D	LF#2	drilling mud	A-24	2078		MMI	499		Jerry Montoya
	61470	10:35	Gasbuggy							Jerry Montoya
3	Gasbuggy well G-B-E mvd pit D	LF#2	drilling mud	B-24	2078		MMI	499		Jerry Montoya
	73780 lbs	14:22	Gasbuggy							Jerry Montoya

✓ 3754

ENTERED AUG 18 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Jerry Montoya COMPANY MMI Trucking SIGNATURE Jerry Montoya

DATE 8/17/04

ENVICOTECH INC.

Bill of Lading

MANIFEST # 21657

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08-18-04 JOB # 04118-001

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GB-E mudpit # 73020	LF#2 6:52	Drilling mud geoprene Echelon	B-22 Richard Russo	18		Russom Trucking Inc.		8:45	Richard Russo
1	Gasbuggy well GB-E mudpit # 77620	LF#2 10:24	Drilling mud geoprene Echelon	B-24 Richard	18		Russom Trucking Inc.		12:10	Richard Russo
1	Gasbuggy well GB-E mudpit # 76900	LF#2 1359	Drilling mud Korrad Clark	B-24	18		Russom		4:00	
										3768
										ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Richard Russo

COMPANY Russom Trucking Inc.

SIGNATURE Richard Russo

DATE 8-18-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY				
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE	
1	Gasbuggy Well GB-E Mudpit # 81060	LF#2 +time 8:05	Drilling mud Georgie Civil	23A	18			551		Cirilo Trujillo	
1	Gasbuggy Well GB-E Mudpit # 72220	LF#2 +time 11:55	Drilling mud Georgie Civil	23A	18			551		Cirilo Trujillo	
	2 lds of 18 yds Clean Soil JH										
										3768	
										ENTERED AUG 23 2004	

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME _____ COMPANY Envitech SIGNATURE Cirilo Trujillo

DATE 8-18-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy Well GB-E Mudpit 69720	LF#2 8:00	Drilling mud Geogre Encheard	B21 Niel Winterken	18		<i>[Signature]</i>	558		
1	Gasbuggy Well GB-E Mudpit 72680	LF#2 11:48	Drilling mud Geogre Encheard	B22 Niel	18			<i>[Signature]</i>	558	
	2 lds	18 yds	Clean Soil	<i>[Signature]</i>						
										3768
										ENTERED AUG 20 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Niel Winterken COMPANY Encheard SIGNATURE *[Signature]*

DATE 8-18-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GB-E Mudpit E	LF#2	Drilling mud	B-23	18		ENVIROTECH	555		Mike Hoyt
#	72520	time 7:52	Geosene Echelon	mile/mi						
1	Gasbuggy well GB-E Mudpit	LF#2	Drilling mud	B-24	18		ENVIROTECH	555		Mike Hoyt
#	175460 lbs	time 11:51	Geosene	mile						
	2 lds	18yds	Clean Soil	JH						
										3804
									ENTERED	AUG 18 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME MIKE HOYT COMPANY ENVIROTECH SIGNATURE Mike Hoyt

DATE 8-18-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy Well GB-E Mudpit E # 79100	LF#2 time 7:44	Drilling Mud Geosens Echelars	B22 Bob Handman	Approx. 18 yds		MPTA	71		Bob Handman
1	Gasbuggy Well GB-E Mudpit E # 73240	LF#2 time 11:45	Drilling Mud Geosens	B22 Bob	18 yds		MPTA	71		Bob Handman
	2 lds 18 yds	Clean Soil	Jett							
										3826

ENTERED SEP 03 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME Bob Handman COMPANY MPTA SIGNATURE Bob Handman

 DATE 8/18/04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GBE mudpit E # 74740	LF#2 7:24	Drilling mud Georgem Gibelman	B-24 mark Bennett	20		Inland-	14	9:20	Mark Bennett
1	Gasbuggy well GBE mudpit E # 73848	LF#2 10:57	Drilling mud Gempel	B-21 Mark	20		Inland.	14	12:40	Mark Bennett
1	Gasbuggy well GBE mudpit E # 75240	LF#2 1433	Drilling mud Konrad Clark	B-20	20		Inland.	14	4:30	Mark Bennett
										3768
							ENTERED AUG 23 2004			

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME MARK BENNETT COMPANY Inland. SIGNATURE Mark Bennett

 DATE 8/18/04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy Well GB-E Mudpit E	LF #2	Drilling Mud	B-20	20		Inland			
#	77220	time 7:15	Georges Etchelland	Benny W						Benny W
1	Gasbuggy Well GB-E mudpit	LF #	Drilling Mud	B-24	20		" "			
#	77000	time 10:29	Georges Etchelland	Benny W						Benny W
1	Gasbuggy Well GB-E Mudpit E	LF #2	Drilling Mud	B-22	20		" "			
	80320	time 1355	Kwad Clark							Benny W
										3768

ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Benny W COMPANY Inland Co SIGNATURE Benny W
Bloomfield NM DATE 8/18/04

ENVISTECH INC.

Bill of Lading

MANIFEST # 21642

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08-19-04 JOB # 04118-001

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gashussy well GB-E mudpite	LF#2	Drilling Mud	B-24	19					
#	79220 lbs	6:52	George Eckelund	Benny W			Inland	17	8:30	Benny W
1	Gashussy well GB-E mudpite	LF#2	Drilling Mud	B-24	18		"	"	17	11:50
#	75880	10:15	George Eckelund	Benny W			"	"	17	Benny W
1	Gashussy well GB-E mudpite	LF#2	Drilling Mud	B-24	18		"	"	17	4:00
#	76580	14:01	George Eckelund	Benny W			"	"	17	Benny W
2 loads clean fill			18 yds	JTB						
										3768

ENTERED AUG 22 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Benny W

COMPANY Inland Co
Bloomfield NM

SIGNATURE Benny W

DATE 8/17/04

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well RBE mudpit # 78460	LF#2	Drilling Mud	B-22	19		INLAND			Benny Begay
	time 7:07		San George's shale							Driver Benny Begay
1	Gasbuggy well RBE mudpit # 78100	LF#2	Drilling Mud	B-23	18		INLAND			Benny Begay
	time 1050		THAIL							Benny Begay
1	1d	18 yds	Clean Soil							
										3768
										ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME BENNY BEGAY COMPANY INLAND SIGNATURE Benny Begay

DATE 8-19-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1 #	Gasbuggy well GB-E mupit E 75320	LF#2 6:59	Drilling mud georgene Eudave	B23 Bob	18		MPTA	71		Bob Hardman
1 #	Gasbuggy well GB-E mupit E 73780	LF#2 10:30	Drilling mud T.Hall	B22 Bob	18		"	"	71	
1	Gasbuggy well AB-E mupit A 74440 lbs	LF#2 14:06	Drilling mud georgene	B21 Bob	18		"	"	71	
2	lbs	Dynals	Clean Soil	JH						
										3826

ENTERED SEP 08 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME Bob Hardman COMPANY MPTA Trucking SIGNATURE [Signature]

 DATE 8-19-04

ENVITECH INC.

Bill of Lading

MANIFEST # 21821

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08-19-04 JOB # GAH8-001

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gashussy well GB-E Mvd pit E # 74560	LF#2 7:11	Drilling mud Gashussy Schelard	druck mark	18		Inland	14	9:00	Mark Bennett
1	Gashussy well GB-E Mvd pit # 74560	LF#2 11:15	Drilling mud Gashussy Schelard	B-24 mark	18		Inland	14	1:30	Mark Bennett
3	1ds	18 yds	Clean Soil	JH						

ENTERED 3768
AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME MARK BENNETT

COMPANY Inland

SIGNATURE Mark Bennett

DATE 8/19/04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gashuggy well G-B-E mud pit E # 80560	LF#2 7.71	Drilling mud georgene	B-20	18		Marquez Trucking	5021	9:10A	Pete Marquez
1	Gashuggy well G-B-E mud pit E # 77720	LF#2 11.18	Drilling mud georgene	B-20	18		Marquez Trucking	5021	11:30A	Pete Marquez
2	1ds	18yds	Clean Soil	GH						
										3768
										ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Pete Marquez COMPANY Marquez Trucking Inc SIGNATURE Pete Marquez

DATE 8-19-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gashuagay Well GB-E Mudpit E	LF#2	Drilling Mud	B 21	18		Etch	558		<i>[Signature]</i>
#	75660	time out 8:00	George Echeburd		Niel Winterker					
1	Gashuagay Well GB-E Mudpit A	LF#2	Drilling Mud	B 21	18		" "	558		<i>[Signature]</i>
#	72960	time out 12:10	George Echeburd		Niel Winterker					
(2 loads fill)										
										3768

ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME N. Winterker COMPANY Envrotech SIGNATURE *[Signature]*

 DATE 8-19-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gashugg ^y well GB-E Mudpit E	LF #2	Drilling Mud	B-23	18			551		
#	C69500	time 8:17	Geovene Ecklar							Cristina Trujillo
1	Gashugg ^y well GB-E Mudpit A	LF #2	Drilling Mud	B-23	18			551		Cristina Trujillo
#	75360	time 12:15	Geovene Ecklar							Cristina Trujillo
1	LF #2	Gashugg ^y	Plan Field		18			551		Cristina Trujillo
2	LF #2	Gashugg ^y	Plan Field		18			551		Cristina Trujillo
										3768
										ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Jason Holden COMPANY Envirotech SIGNATURE Jason Holden
ENVIROTECH, INC. DATE 8-19-04

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GBE mspit	LF#2	Drilling mud	C-22	18		Russon Trucking	4	2:00	Richard K.
#	74666	11:59	RED Generator Ectok				Richard Russon			
1	Gasbuggy well GBE mspit	LF#2	Drilling mud	B-23	18		"	"	4	
	1	1d	18 yds	Clean Soil						

3768

ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Russon Trucking Inc. COMPANY Russon Trucking Inc. SIGNATURE Richard Russon

DATE 8-19-04

ENV.ROTECH INC.

Bill of Lading

MANIFEST # 21830

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08-19-04 JOB # 04118-001

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well #BE mudpit E # 81140	LF#2 time 7:48	Drilling mud George Eckhard	C-22 Dred	18 yds		Russom Trucking, Inc.	3	9:45	Robert H. Sanchez Jr
1	Gasbuggy well #BB-E mudpit A # 77140	LF#2 time 11:54	Drilling mud George Eckhard	C-22	18 yds		Russom Trucking, Inc.	3	1:45	Robert H. Sanchez Jr
1	2 lds	18 yds	Clean Soil	JH						
										3768

ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Robert Sanchez Jr COMPANY Russom Trucking, Inc. SIGNATURE Robert H. Sanchez Jr

DATE 8-19-04

ENVIROTECH INC.

Bill of Lading

MANIFEST # 21831

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08-19-04 JOB # 04118-001

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gashbuggy Well GB-E Mudgett # 77560	LF#2 7:41	Drilling mud George Eckel	24B	18		Russom Trucking	1	9:15	Ron Russom
2	Gashbuggy Well GB-E Mudgett # 74780	LF#2 1130	Drilling mud THall	24B	18		Russom Trucking	1	1:23	Ron Russom
	2 lds	18 yds	Clean Soil	JH						
										3768
										ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Ron Russom COMPANY Russom Trucking Inc. SIGNATURE Jason Holden
JASON HOLDEN ENVIROTECH, INC. DATE 8-19-04

ENVITECH INC.

Bill of Lading

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

MANIFEST # 21832
 DATE 08-19-04 JOB # 0418-001

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GB-E mudpit E	LF#2	Drilling mud	B-22	18		Heller	#99		Patrick Montoya
	# 75220	time 7:35	Geopere Echobay							Driver Patrick Montoya
1	Gasbuggy well GB-E mudpit	LF#2	Drilling mud	B-21	18		Heller	#99		Patrick Montoya
	# 74180	time 11:50	Geopere Echobay							Driver Patrick Montoya
	1 lb	Bygones	Clean Soil	JH						
										3768

ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME

Patrick Montoya

COMPANY

Heller

SIGNATURE

Patrick Montoya

DATE

8/19/04

M&M

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GB-E midpit E # 74200	LF#2 # 7:26	Drilling Mud Gearsone Echevarria	B-20 Russell Ford	18		<i>[Signature]</i> Trucking			<i>[Signature]</i>
1	Gasbuggy well GB-E midpit # 73660	LF#2 # 11:45	Drilling Mud Gearsone Echevarria	B-21 Russell	18		<i>[Signature]</i> Trucking			<i>[Signature]</i>
1	18 yds		Clean Soil	G#						

3768

ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME *[Signature]*

 COMPANY *[Signature]*
Trucking

 SIGNATURE *[Signature]*

 DATE 8-19-04

Bill of Lading

MANIFEST # 22001
 DATE 8-20-04 JOB # 04118-001

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy E-A #s 75040	LF2 Time 0807	Drilling Mud mud. T Hall	A20	18		EmerAcol	558		<i>[Signature]</i>
1	Gasbuggy well 67E 76680	1220	T Hall concrete	A20	18		Winterton	558		<i>[Signature]</i>
2	1ds	18yds	Clean Soil	JH						
									3768	
									ENTERED AUG 23 2004	

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Aeil Winterton COMPANY EmerAcol SIGNATURE *[Signature]*

DATE 8-20-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy EE #1's 11940	LFZ Time 0812	drilling Mud concrete THall	23 ^B Driver S. Trujillo	18		Staller Havers	551		Cirilo Trujillo
1	Gasbuggy Well GBE Mud pit 80280	LFZ 1146	drilling Mud GBE Mud pit THall Concrete	21 ^A S. Trujillo	18		Staller Havers	551		Cirilo Trujillo
(1)	LF ^B 2	Gasbuggy	Class Fill		18		Staller Havers	551		Cirilo Trujillo
(2)	LF ^B 2	Gasbuggy	Class Fill		18		Staller Havers	551		Cirilo Trujillo
										3777

ENTERED AUG 26 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME _____

 COMPANY Envitech
Staller Havers

 SIGNATURE Cirilo Trujillo

 DATE 8-20-04

Bill of Lading

MANIFEST # 21644

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08-19-04 JOB # 04118-001
2096

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GB-E mudpit # 81200	LF#2 time 6705	Drilling MUD THall	B-23	18		Inland	17	8:30	Benny W
1	Gasbuggy well GB-E mudpit # 76960	LF#2 time 1030	Drilling MUD THall	B-23	18		Inland	17	12:00	Benny W
	Gasbuggy well GB-E			C-23	18		Inland	17	3:35	Benny W
	706280	13.50	THall							Benny W
	3 loads of 18 yds clean soil									
										3768
										ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Benny W COMPANY Inland Co SIGNATURE Benny W
Benny W DATE 8/19/04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY				
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE	
1	Gasbuggy well G6-E Mvd pit # 75360	LF#2 time 0710	Drilling Mud * 11 Gall	B-20	18		Inland	14	9:00	Mark Bennett	
1	Gasbuggy # 77300	LF#2 time 1105	Drilling Mud * 11 Gall	B-20	18		Inland	14	1:15	Mark Bennett	
● 1 loads of 18 yds clean soil											
										3768	

ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME MARK BENNETT COMPANY Inland SIGNATURE Mark Bennett

 DATE 8/20/04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GB-E mudpit # 75680	LF#2 time 0716	Drilling Mud sign T Hall	C-21	18		INLAND	L-81	9:10	Benny Begay
1	Gasbuggy well GB-E mudpit # 77360	LF#2 time 1115	Drilling Mud sign T Hall	C-24	18		INLAND		1:30	Benny Begay
	2 lds of clean soil		18 yds each							
										3768
										ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME BENNY BEGAY COMPANY INLAND SIGNATURE Benny Begay

DATE 8-23-04

ENVIROTECH INC.

Bill of Lading

MANIFEST # 21647

PHONE: (505) 632-0615 • 5786 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08-20-04 (20) (66) JOB # 04118-001

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY				
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE	
1	Garbuggy well GB-E mwp	LF#2	Drilling Mud	C-21	18						
#	75060	time 0723	THall				Patrick Montoya	99	9:40	<i>[Signature]</i>	
1	Garbuggy well GB-E mwp	LF#2	Drilling Mud	C-21	18						
#	77840	time 1125	THall				Patrick Montoya	99	1:45	<i>[Signature]</i>	
	2 lds of 18 yds clean soil										
										3768	
										ENTERED AUG 23 2004	

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME *[Signature]*
JASON HOLDEN

COMPANY *[Signature]*
M+M Trucking

SIGNATURE *[Signature]*
Patrick Montoya
 DATE 8-20-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy Well GB-E mudpit # 74200	LF#2 time 0728	Drilling M/A T Hall	C-22	18		Russell Ford TRK	27	9:30	
1	Gasbuggy Well GB-E mudpit # 75860	LF#2 time 1111	Drilling M/A T Hall	C-22	18		Russell Ford TRK	27	1:20	
	2 lds of 18 yds clean soil			JH						
										3768

ENTERED AUG 25 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME _____

 COMPANY Russell Ford

 SIGNATURE Russell Ford

DATE _____

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

MANIFEST # 21650

DATE 08-20-04 JOB # 04118-001
2004

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY				
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE	
1	Gasbuggy well AB-E mudpit # 78180	LF#2 time 0735	Drilling Mud THall	B-21	18		Marquez Trucking	5021	9:15A	Pete Marquez	
1	Gasbuggy well AB-E mudpit # 80020	LF#2 time 1121	Drilling Mud THall	C-21	18		Marquez Trucking	5021	11:20A	Pete Marquez	
2	18 yds Clean soil JH										
										3768	
										ENTERED AUG 23 2004	

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Pete Marquez COMPANY Marquez Trucking SIGNATURE Pete Marquez

DATE 8-20-04

Bill of Lading

MANIFEST # 21651

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 0820-04 JOB # 04118-001
20 96

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy Well GB-E mudpit # 77080	LF#2 time 0740	Drillings Mud sign T.Hall	C-21	18		INLAND	12	9:05	<i>J.W. Smith</i>
1	Gasbuggy Well GB-E mudpit # 79300	LF#2 time 1142	Drillings Mud sign T.Hall	C-20	18				1:20	
Back fill @ 18 yards										
Back fill @ 18 yards pre load.										
3-768										
ENTERED AUG 23 2004										

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above-mentioned Generator, and that no additional materials have been added."

NAME *J.W. Smith* COMPANY INLAND CORP SIGNATURE *J.W. Smith*

DATE 8/20/04

ENVIROTECH INC.

Bill of Lading

MANIFEST # 21652

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08-20-04 JOB # 04118-001
20 (9C)

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GB-E mudpit	LF#2	Drillings M/A	B20	18		Russom Truck	1	9:31	Ken Russom
#	77620	time 0746	48" - Htall	Russom						
1	Gasbuggy well GB-E mudpit	LF#2	Drillings M/A	B20	18		Russom Truck	1	1:27	Ken Russom
#	79680	time 1130	* Tball	R Russom						
2 lds 18 yds clean soil JH										
										3768
										ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Ken Russom COMPANY Russom Truck SIGNATURE Jason Holden
JASON HOLDEN ENVIROTECH, INC. DATE 8-20-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbussy Well GB-E mud pit # 79140	LF#2 time 0752	Drilling Mud sign Tball	C-22	18 yds		Russom Trucking Inc	3	9:30	Robert H. Sanchez jr.
1	Gasbussy Well GB-E mud pit # 79220	LF#2 time	Drilling Mud sign 1135	C-21	18 yds		Russom Trucking Inc	3	1:17	Robert H. Sanchez jr.
	2 lds	18 grds	Clean Soil	JH						

3768
 ENTERED AUG 20 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME ROBERT H. SANCHEZ JR. COMPANY Russom Trucking Inc. SIGNATURE Robert H. Sanchez jr.

DATE 8-20-04

ENVIROTECH INC.

Bill of Lading

MANIFEST # 21678

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08-20-04 JOB # 04118-001

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy Well GB-E Mudpit # # AA # 79460	LF#2 0800	Drilling Mud THall	B-24	18		ENVIROTECH	518 555		Mike Hoyt
1	Gasbuggy Well GB-E Mudpit # # 77580	LF#2 1225	Drilling Mud THall	B-20			ENVIROTECH ENDING CEMENT	555		Mike Hoyt
2	18yds	Clean Soil	JH							
									3768	
										ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME MIKE HOYT

COMPANY ENVIROTECH

SIGNATURE Mike Hoyt

DATE 8-20-04

ENVIROTECH INC.

Bill of Lading

MANIFEST # 21680

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08-24-04 JOB # 04118-001

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gashoggy Well GB-E Mud pit # 73420	LF#2 C700	Drilling Mud Titall	B21	18		MPHA	71		Bob Hardman
1	Gashoggy Well GB-E Mud pit # 74920	LF#2 #1035	Drilling Mud Titall	B21	18					A Hardman
	Gashoggy Well GB-E Mud pit # 72020	1415	Titall	C23	18					A Hardman
3	1ds 18yds Clean Soil						JH			

3826
ENTERED SEP 01 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Bob Hardman

COMPANY MPHA

SIGNATURE Bob Hardman

DATE 8/24/04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well G-B-E mud pit # 80360	LF#2 time 7:03	Drilling Mud Gageo Zehla	C-21	18		Marquez Truck	5021	9:00	Pete Marquez
1	Gasbuggy well G-A-E mud pit # 78700	LF#2 time 10:49	Drilling Mud Gageo	C-23	18		Marquez Truck	5021	12:00	Pete Marquez
3	lbs	18 yds	Clean Soil	JH						
										3804
										ENTERED AUG 31 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Pete Marquez COMPANY Marquez Landfill & Rep SIGNATURE Pete Marquez

DATE 8-21-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Goshussy Well GAE Mapt # 75580	LF#2	Drilling Mud	C-22	18		Inland	12		JD Sunk
	time 8:26		55% Geosore Echebur				}			}
1	Goshussy Well GAE Mapt # 7140	LF#2	Drilling Mud	C-22	18		Inland	12		JD Sunk
	time 11:54		55% Geosore Echebur							
1	ld	18 yds	Clean Soil							
										3768
										ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME JD COMPANY Inland SIGNATURE [Signature]

DATE 8/21/04

Bill of Lading

RECEIVED 22006
 MANIFEST # 22006

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08-21-04 JOB # 04118-001

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Garbussy Well GB-E mudpita # 88320	LF#2 8:23	Drilling Mud	B20	28	18 ✓	ETEC	558		[Signature]
			gearless			mid winter				
1	Garbussy Well GB-E mudpita # 71220	LF#2 12:15	Drilling Mud	C-20	18	18 ✓	ETEC	558		[Signature]
			gearless			mid winter				
			2 loads fill ✓							
			2 loads complete							

377
 ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Mark Winter COMPANY Enviro Tech SIGNATURE [Signature]

DATE 8-21-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbussy well GE mudpit #74400	LF#2	Drilling Mud	21B	18	✓	Staller Humber	551	8:15	Cirilo Trujillo
			Concrete							
1	Gasbussy well GE mudpit #74200	LF#2	Drilling Mud	21C	18	✓	Staller Humber	551	12:11	Cirilo Trujillo
			Concrete							
1	LF#2	Gasbussy	Clay		18	✓	Staller Humber	551		Cirilo Trujillo

ENTERED 3777
AUG 20 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME _____ COMPANY E Tech SIGNATURE Cirilo Trujillo

DATE 08-21-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbussy well GB-E mudpita #78180	LF#2	Drilling Mud	23			Russom			
	time 8:04		Sign George Echelua							Driver John Russom
1	Gasbussy well GB-E mudpita #77700	LF#2	Drilling Mud	22			"	"		
	time 11:50		Sign George Echelua							Driver John Russom
1	1d	18yds	Clean Soil	JH						
										3768

ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME John COMPANY Russom Trucking, Inc. SIGNATURE John T. Russom

DATE _____

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gashussy well G-B-E mud pit A # 78140	LF#2 7:57	Drilling Mud	23C	18		Russom Trkg	1	9:45	Ron Russom
			geyser Echelon							
1	Gashussy well G-B-E mud pit A # 77688	LF#2 11:35	Drilling Mud	22C	18		Russom Trkg	1	1:24	Ron Russom
			geyser Echelon							
	1 ld	18 yds	Clean Soil							
										3768

ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Ron Russom COMPANY Russom Trucking, Inc. SIGNATURE Ron Russom

DATE 8.21.04

EN' ROTECH INC.

Bill of Lading

MANIFEST # 22010
 DATE 08-21-04 JOB # 04118-001

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gashussy Well # 6-E mud pit A # 74200	LF#2 7:53	Drilling Mud George Eckel	22C Drier Benny Begay	18		INland	L-91		Benny Begay
1	Gashussy Well # 6-E mud pit A # 77068	LF#2 11:59	Drilling Mud George Eckel	21C Drier Benny Begay	18		INland	L-91		Benny Begay
1	100 yds	18 yds	Clean Soil	JH						
										3768

ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME BENNY BEGAY COMPANY INland SIGNATURE Benny Begay DATE 8-21-04

ENVIROTECH INC.

Bill of Lading

MANIFEST # 22011
 DATE 08-31-04 JOB # 04118-001

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GBE mud pit A # 76140	LF#2	Drilling Mud Oregon Echelon Concrete	B-20	18		ENVIROTECH	555		Mike Hoyt ENDUMP CEMENT
1	Gasbuggy well GBE mud pit A # 75580	LF#2	Drilling Mud Oregon Echelon Concrete	C-20	18		ENVIROTECH	555		Mike Hoyt ENDUMP CEMENT
2	1ds	18 yds	Clean Soil							
									3768	
									ENTERED	AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME MIKE Hoyt COMPANY ENVIROTECH SIGNATURE Mike Hoyt

DATE 8-31-04

Bill of Lading

MANIFEST # 22012

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08-21-04 JOB # 04118-001

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well B-B-E mudpit A # 74960	LP#2 time 7:43	Drilling Mud 915# Georges Echelard	C-24	18		Intermodal	14	9:40	Mark Bennett
	Gasbuggy well B-B-E mudpit A #	LP#2	Drilling Mud 915#	C-24	18					
2	1ds	18yds	Clean Soil	JH						

3804

ENTERED AUG 21 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME MARK BENNETT COMPANY Intermodal SIGNATURE Mark Bennett

DATE 8/21/04

Bill of Lading

MANIFEST # 22013

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08-21-04 JOB # 04118-001

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY				
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE	
1	Gasbussy Well G-B-E m. Sp. A # 75706	LF#2	Drilling Mud	C-23	18		George Echeburra	Fabrice Montoya			P. Echeburra
1	Gasbussy Well G-B-E m. Sp. A #	LF#2	Drilling Mud	C-23	14		"	"			
	1	ld	18 yds	Clean Soil							

3768

ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Jason Hiden

COMPANY Mont Trucking Int'l Inc

SIGNATURE Fabrice Montoya

DATE 8-21-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gashussy Well CB-E mudpit A * 74500	LF#2 time 7:30	Drilling Mud Gargore Eshel Bob Hartman	C23	18		MPTA	71		Bob Hartman
1	Gashussy Well CB-E mudpit * 74160	LF# time 11:05	Drilling Mud Gargore Eshel Bob Hartman	C23	18		" "	71		
2	1ds	8yds	Clean Soil	JH						

3826

ENTERED SEP 08 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME Bob Hartman COMPANY MPTA SIGNATURE Bob Hartman

 DATE 8/21/04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbussy Well FB-E MUD pit A # 77320	LF#2 time 7:25	Drilling MUD Geogre Exhler	C-24 DRIVE Benny W	18		Inland		8:15	Benny W
1	Gasbu Well FB-E MUD pit # 76640	LF#2 time 10:53	Drilling MUD Geogre Exhler	C-24 Benny W	18		" "		12:47	Benny W
	2 lds	18 yds	Clean Soil							
										3768

ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME Benny W

 COMPANY Inland Co
Bloomfield, N.M.

 SIGNATURE Benny W
 DATE 8/21/04

Bill of Lading

MANIFEST # 22016

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08-21-04 JOB # 04118-001

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbussy Well GB-E M-2pt A # 63960	LF#2 8:32	Drilling MUD C-22 Gauger/Chips				Russom Trucking	4	10:15	Richard Russom
1	Gasbussy Well GB-E M-2pt 7780	LF# 12:02	Drilling MUD C-23 Gauger/Chips				Russom Trucking	4	2:00	Richard Russom
	2 lds	18 yds	Clean Soil	JH						
										3768

ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Richard Russom COMPANY Russom Trucking Co SIGNATURE Richard Russom

DATE 8-21-04

ENVIROTECH INC.

Bill of Lading

MANIFEST # 22018

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08-23-04 JOB # 04118-001

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GB-E mud pit # 78260	LF#2 0620	Drilling Mud THall	C-20 U. Hunt	18		ENVIROTECH CEMENT EMAMP	555		Mike Hoyt
			Concrete							
1	Gasbuggy well GB-E mud pit # 78160	LF#2 1045	Drilling Mud THall	C-20 U. Hunt	18		ENVIROTECH CEMENT EMAMP	555		Mike Hoyt
			Concrete							
	2 lds	18 yds	Clean Soil	JH						
										3804
										ENTERED AUG 31 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME MIKE HOYT COMPANY ENVIROTECH SIGNATURE Mike Hoyt

DATE 8-23-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy Well GB-E mud pit # 78760	LF#2 time 0625	Drilling Mud THall	C20 N. Winton	18 ✓	✓	Etec	558		<i>[Signature]</i>
1	Gasbuggy Well GB-E mud pit # 79800	LF#2 time 1047	Drilling Mud T.Hall	D20 N. Winton	18 ✓	✓	"	" 558		<i>[Signature]</i>
	Gasbuggy well GB-E mud pit # 80320	LF#2 time 1310	Drilling Mud THall	D20 N. Winton	18 ✓	✓	"	" 558		<i>[Signature]</i>
			3 lds concrete ✓							
			2 lds fill ✓							
										3777

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME Neil Winton

 COMPANY E.T.E.C.

 SIGNATURE *[Signature]*

 DATE 8-23-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BELS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbussy Well G8-E MudepitA # 74820	LF#2 time 0630	Drillings Mud T Hall	D-20	Cement		Enovatech	551		Leroy Paul
1	Gasbussy Well G8-E MudepitA # 74500	LF#2 time 1010	Drillings Mud T Hall	D-20	Cement		Enovatech	551		Leroy Paul
#	Gasbussy Well G8-E MudepitA	LF#2	Drillings Mud T Hall	D-20	Cement		Enovatech	551		Leroy Paul
1	LF#2	Gasbussy	Back fill		18		Enovatech			Leroy Paul
2	LF#2	Gasbussy	Back fill		18		Enovatech			Leroy Paul
3	LF#2	Gasbussy	Back fill		18		Enovatech			Leroy Paul

3771

ENTERED AUG 26 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME Leroy Paul

 COMPANY Enovatech

 SIGNATURE Leroy Paul

 DATE 8-23-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gashussy well GBE mudpit A # 77620	LF#2 Hill decks	Drilling mud THall	24C	18		Russom Trkg	1	8:32	Russom
1	Gashussy well GBE mudpit A # 74740	LF#2 Hill 1105	Drilling mud THall	24C	18		Russom Trkg	1	12:47	Russom
1	Gashussy well GBE mudpit A # 76960	LF#2 1430	Drilling mud THall	24C	18		Russom Trkg	1	4:30	Russom
2	1ds	18 yds	Clean Soil	JH						

3804

ENTERED 8-23-04

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above-mentioned Generator, and that no additional materials have been added."

NAME RON RUSSOM

COMPANY Russom Trucking, Inc.

SIGNATURE Russom

DATE 8-23-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BELS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbussy well A # 75820	LF #2 time 0655	Drilling Mud THall	C-22 Diver Richard Ransom	18		Ransom Trucking	4	9:15	Richard Ransom
1	Gasbussy well A # 76840	LF #2 time 1130	Drilling Mud THall	C-22 R. Ransom	18		Ransom Trucking	4	1:30	Richard Ransom
	2 lds	18 yds	Clean soil	JH						

3809

ENTERED AUG 23 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME Richard Ransom COMPANY Ransom Trucking Inc SIGNATURE Richard Ransom

 DATE 8-23-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy Well GBE mud pit A # 7520	LF#2 time 0700	Drilling Mud THall	C23	18		MPFA	71		Bob Holden
1	Gasbuggy Well GBE mud pit A # 74040	LF#2 time 1118	Drilling Mud THall	C22	18		" "	71		R. Hardman
1	Gasbuggy Well GBE mud pit A # 73080	LF#2 1500	Drilling Mud THall	C22	18		" "	71		R. Hardman
	2 lds 18yds	Clean Soil	JH							
										3826
										ENTERED SEP 5 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME ~~Bob~~ **JASON HOLDEN** COMPANY **MPFA** SIGNATURE Jason Holden DATE 8-23-04

ENVIRTECH, INC.

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbussy Well 79800	LF#2 time 0707	Drillings MUD THall	C-22 Dow Lunell Ford	18		<i>[Signature]</i> Lunell Ford	27	8:40	<i>[Signature]</i>
1	Gasbussy Well 73920	LF#2 time 1100	Drillings Mud THall	C-23 Dow R. Ford	18		<i>[Signature]</i> Lunell Ford	27	1:00	<i>[Signature]</i>
	2 lds	18yds	Clean Soil	JH						
										3809
										ENTERED AUG 24 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME *[Signature]* COMPANY *[Signature]* SIGNATURE *[Signature]* DATE 8-13-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gashussy Well # 80780	LF#2 time 0712	Drillings M&B sign T Hall	C-24	18		MARQUEZ TRUCKING	5021	9:05A	Pete Marquez
1	Gashussy Well # 78660	LF#2 time 1107	Drill sign T Hall	C-20	18		MARQUEZ TRUCKING	5021	1:10	Pete Marquez
1	ld	18 yds	Clean Soil	JH						
										3804
										ENTERED AUG 21 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Pete Marquez COMPANY Marquez Trucking + Box SIGNATURE Pete Marquez

DATE 8-23-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	GASBOUSSY well # 77580	LF#2 0725	Drilling mud T. Hall	C-21	18		Inland			Benny W
1	GASBOUSSY well # 74020	LF#2 1115	Drilling mud T. Hall	C-21	18		" "			Benny W
	11d 18yds Clean Soil		JH							
										3804
										ENTERED AUG 31 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Benny W COMPANY Inland Co SIGNATURE Benny W
Bloomfield NM DATE 8/23/04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Cashussy Well GBA # 78400	LF#2 time 0735	Drilling Mud T-tall	D-23	18		Inland	12	9:30	Bob Simkins
1	Cashussy Well GBA # 77480	LF#2 time 1138	Drilling Mud T-tall	D-23	18		Inland	12	1:30	Bob Simkins
1	1 Id 18yds	Clean Soil	JH							
										3804
										ENTERED AUG 2 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Bob Simkins COMPANY Inland SIGNATURE Bob Simkins DATE 8-23-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gas buggy well GB E mudpit A # 74920	LF #2 time 0725	Dilling Mud Sign: T. Hall	D-23 driver Russell	18		<i>Landfill Trucking</i>	27	9:45	<i>Landfill Trucking</i>
1	Gas buggy well GB-D # 72100	LF #2 time 1120	Dilling Mud Sign: T. Hall	D-23 driver Russell	18		<i>Landfill Trucking</i>	27	2:15	<i>Landfill Trucking</i>
	2 lds	18yds	Clean Soil	GH						
										3804
										ENTERED AND SIGNED

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME *Landfill Trucking*

 COMPANY *Landfill Trucking*

 SIGNATURE *Landfill Trucking*

 DATE 8-24-04

Bill of Lading

MANIFEST # 21695

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08/24/04 JOB # 04118-001

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gas buggy well # GBE mud pit A # 76900	LF # 2 time 0740	Drilling Mud Sign T. Hall	D-21 driver Benny W.	18		Intford		9:20	Benny W
1	Gas buggy well # 75040	LF # 2 time 1125	Drilling Mud Sign T. Hall	D-21 driver Benny W.	16		" "		1:30	Benny W
	2 lds 18 yds		Clean Soil	JH						

3804
ENTERED AUG 31 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Benny W

COMPANY Intford Co
Bloomfield NM

SIGNATURE Benny W
DATE 8/24/04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GBE mudpit A # 76880	LF#2 time 0745	Drilling Mud Sign T. Hall	C-21 driver Mark Bennett	18		Inland	14	9:30	Mark Bennett
1	Gasbuggy well GB-D # 80720	LF#2 time 1200	Drilling Mud Sign T. Hall	S-22 driver Mark Bennett	18		Inland	14	2:00	Mark Bennett
2	1ds	18yds	Clean Soil	JH						
										3804
										ENTERED AUG 31 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME MARK BENNETT COMPANY Inland SIGNATURE Mark Bennett

 DATE 8/24/04

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gashaggy well GB-E Mud pit A # 76440	LF # 2 time 0920	Drilling Mud T.Hall	D20	18		ETEC	558		<i>[Signature]</i>
1	Gashaggy well GB-E Mud pit A # 80660	LF # 2 time 1245	Drilling Mud T.Hall	D20	18		ETEC	558		<i>[Signature]</i>
			2 lds concrete							
			2 lds fill							
										3804

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Neil Winterton COMPANY ETEC SIGNATURE *[Signature]*

DATE 8-24-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy Well GBE mudpit A	LF#2	drilling Mud	D-24	19		Inland	3	8:50	
	# 75320	time 0720	SS T.Hall	Driver JD						
1	Gasbuggy Well GBE mudpit A	LF#2	drilling Mud	D-24	18		" "	3	12:50	
	# 75040	time 1105	Sign T.Hall	Driver JD						
	Back Fill	2 lds	18 yds							
										3804
										ENTERED AUG 31 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME JD Sinkins COMPANY Inland SIGNATURE [Signature]

DATE 8/24/04

ENVITECH INC.

Bill of Lading

MANIFEST # 21700

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08/24/04 JOB # 04118-001

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY				
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE	
1	Gasbuggy well GBE mud pit # 75400	L#2 time 0707	drilling Mud sim T.Hall	D-24 Driver Robert Sanchez	18yds		Russian Trucking Inc	3	8:56	Robert Sanchez	
1	Gasbuggy well GBE mud pit # 75420	L#2 time 1055	Drilling Mud sim T.Hall	D-22 Driver Robert Sanchez	18yds		Russian Trucking Inc	3	12:55	Robert Sanchez	
2	1ds	18yds	Clean Soil	JH							
									3804		
									ENTERED	AUG 30 2004	

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME ROBERT SANCHEZ COMPANY Russian Trucking Inc. SIGNATURE Robert Sanchez

DATE 8-24-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy Well GBE mudpit A #75040	LF#2 time 0703	Drilling Mud 20m T.Hall	24D Driver Ron Russon	18		Russon Trkg	1	8:51	Ron Russon
1	Gasbuggy Well GBE mudpit A #75800	LF#2 time 1055	drilling Mud 30m T.Hall	22D Driver Ron Russon	18		Russon Trkg	1	12:45	Ron Russon
	2 lds 10yds		Clean Soil	JH						
										3804
										ENTERED AUG 24 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Ron Russon COMPANY Russon Trucking Inc SIGNATURE Ron Russon

DATE 8-24-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GBE mud pit A # 73320	LF # 2 time 0657	Drilling Mud THall Concrete	D23	18		MPYA	71		Bob Hardman
1	Gasbuggy well GBE mud pit A # 73620	LF # 2 time 1040	Drilling Mud THall Concrete	D24	18		" "	71		B. Hardman
1	Gasbuggy well G.B.D # 70920	LF # 2 time 1425	drilling mud THall Concrete	D21	18		" "	71		B. Hardman
	3 lds	18 yds	Clean Soil	JH						

3826

ENTERED SEP 08 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME Bob Hardman

 COMPANY MPYA Trucking

 SIGNATURE Bob Hardman

 DATE 8/24/04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GB E mudpit A # 76260	LF#2 time 06:30	Drilling Mud THall	D20	18		Envirotech	551		Larry Paul
			Concrete							
1	Gasbuggy well GB E mudpit A # 73240	LF#2 time 09:55	Drilling Mud THall	D20	18		Envirotech	551		Larry Paul
			Concrete							
1	Gasbuggy well GB-E mudpit A # 74360	LF#2 1325	Drilling Mud THall	D-20	18		Envirotech	551		Larry Paul
			Concrete	L. Paul					3777	
							ENTERED AUG 26 2004			
1	L.F. #2	Gasbuggy	Bank 711				Envirotech	551		Larry Paul
2	L.F. #2	Gasbuggy	Bank 711				Envirotech	551		Larry Paul
3	L.F. #2	Gasbuggy	Bank 711				Envirotech	551		Larry Paul

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Larry Paul COMPANY Envirotech SIGNATURE Larry Paul

DATE 8-29-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy Well C-B E Mudpit A # 74620	LF#2 fine 0035	Drilling Mud T.Hall	C-20	18		ENVIROTECH	549		Mike Hoyt
			Concrete							
1	Gasbuggy Well C-B E Mudpit A # 74660	LF#2 fine 1000	Drilling Mud T.Hall	C-20	18		ENVIROTECH	549		Mike Hoyt
			Concrete							
1	Gasbuggy Well C-B E Mudpit A # 73440	fine 1315	T.Hall	C-20	18		ENVIROTECH	549		Mike Hoyt
			Concrete							
	3 lds 18grds	Clean Soil	JH							3804
										ENTERED AUG 24 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME MIKE HOYT COMPANY ENVIROTECH SIGNATURE Mike Hoyt

DATE 8-24-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GB E Mudpit A # 79600	LF#2 time 0650	dulling Mud Equ. T.Hall	D-21	18		Marquez Truck	5021	8:15A	Pete Marquez
1	Gasbuggy well GB D # 81100	LF#2 time 1050	dulling Mud Equ. T.Hall	D-23	18		MARQUETE	5021	12:35	Pete Marquez
1	Gasbuggy well GB-D # 70940	LF#2 1430	dulling Mud T.Hall	D-23	18		Marquez	5021	4:25	Pete Marquez
3	lds	18 yds	Clean Soil	JH						
										3804
										ENTERED AUG 31 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Pete Marquez COMPANY Marquez Trucking ROP SIGNATURE Pete Marquez

DATE 8-24-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well #83080	LF #2 time 8:17	drilling mud inspec. gas engine	D-20 driller John Russom	18		Russom trucking	10	10:15	
1	Gasbuggy well GBE mud pit A #77620	LF #2 time 1220	drilling mud inspec. T Hall	D-20 driller John Russom	18		" "	10	2:30	
	1 Id Byrd	Clean Soil		JH						
										3804

ENTERED AUG 31 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME John Russom COMPANY RUSSEOM TRUCKING INC. SIGNATURE John T. Russom

 DATE 8/25/04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GBE mvdptA # 75520	CF#2 Time 6:47	Drilling Mud graze Ectol Concrete	C-20	18		ENVIROTECH	549		Mike Hoyt
1	Gasbuggy well GBE mvdptA # 81480	CF#2 Time 10:15	Drilling Mud graze Ectol Concrete	D-20	18		ENVIROTECH	549		Mike Hoyt
1	Gasbuggy well GBE mvdptA # 95360	CF#2 T 13:20	Drilling Mud THall Concrete	D-20	18		ENVIROTECH	549		Mike Hoyt
	3 lds	18 yds	Clean Soil	JH						3804
										ENTERED AUG 25 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME MIKE HOYT COMPANY ENVIROTECH SIGNATURE Mike Hoyt

DATE 8-25-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well G-3-D # 76780	Lf #2 time 8:11	Drilling Mud INSPEC. Gangar-Filata	D-22 driver Richard Russon	18		Russon Trk	4	10:15	Richard Russon
1	Gasbuggy well G-3-E mud pit # 76620	Lf #2 time 12:15	Drilling Mud INSPEC. Hally	D-22 driver Richard Russon	18		" "	4	2:30	Richard Russon
1	1 lb	18 yds	Clean Soil	JH						
										3804

ENTERED AUG 31 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME Richard Russon COMPANY Russon Trucking Inc. SIGNATURE Richard Russon

 DATE 8-25-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GBE-EMD, VA # 78360	L#2 time 8:06	drilling mud (inspec) Grassm Echeke	D-23 Jura Robert Sanchez	18yds		Russon Trucking Inc.	3	9:52	Robert Sanchez
1	Gasbuggy well GBE mud pt. A # 76740	L#2 time 11:50	drilling mud (inspec) Hall	D-24 Jura Robert Sanchez	18yds		Russon Trucking Inc.	3	1:36	Robert Sanchez
1	18yds	Clean Soil		JH						
										3804

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME ROBERT H. SANCHEZ JR. COMPANY Russon Trucking Inc. SIGNATURE Robert H. Sanchez Jr.

DATE 8-25-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gusbuggy well # 74620	LF#2 time 7:52	drilling mud (inspec) (generator school)	D-23 drive	18		M9 M 98	98	10:30	Bud Berkeley
1	Gusbuggy well # 74860	LF#2 time 12:05	drilling mud (inspec) (HALL)	D-23 drive	18		M9 M 98	98	2:10	Bud Berkeley
1	1d	18yds	Clean Soil	JH						
										3804

ENTERED AUG 31 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME Bud Berkeley COMPANY M9 M 98 SIGNATURE Bud Berkeley

 DATE 8-25-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Sasbuggy well # 75500	LF#2 time 7:40	drilling Mud inspec. Roger Schelma	D-22 driver Russell Gre	18		<i>[Signature]</i>	27	10:40 9:40	<i>[Signature]</i>
1	Sasbuggy well # 75000	LF#2 time 12:10	drilling Mud inspec. T Hall	D-24 driver Russell Gre	18		<i>[Signature]</i>	27	1:00	<i>[Signature]</i>
	2 lds	18 grds	Clean Soil	JH						
										3804

ENTERED AUG 31 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME *[Signature]* COMPANY *[Signature]* SIGNATURE *[Signature]* DATE 8-25-04

Bill of Lading

MANIFEST # 21714

PHONE: (505) 632-0615 • 5798 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08/25/04 JOB # 04118-001

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well # 77240	LF #2 6 mi 7:37	Drilling Mud inspec. Grease-Gel Benny Began	D 23 dover	18		INLAND	L-87	10:25	Benny Began
1	Gasbuggy well # 84440	LF #2 time 12:00	Drilling Mud inspec Hill	D 22 dover	18		INLAND	L-87	2:50	Benny Began
	2 lds	18 yds	Clean Soil	JH						3804
										ENTERED AUG 27 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME BENNY BEGAN COMPANY INLAND SIGNATURE Benny Began

DATE 8-25-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy Well GB- # 79980	LF #2 time 7:29	dull mud inspec Geoproc/Echidna	6-22+21	18		Inland	14	9:45	Mark Bennett
1	Gasbuggy Well GB E A # 77460	LF #2 time 11:45	dull mud inspec. T. Hall	6-24+23	18		Inland	14	2:10	Mark Bennett
2	1ds	18 yds	Clean Soil	JH						
										3809
										ENTERED 08/25/04

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME MARK BENNETT COMPANY Inland SIGNATURE Mark Bennett

DATE 8/25/04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
	Gasbuggy well GB-D # 79976	LF#2 time 7:17	Drilling Mud inspec. Genser/Gbld	D-23 inspec. V-K/Marquez	18		MARQUEZ TR	5021	9:05	Pete Marquez
	Gasbuggy well GB-D # 76020	LF#2 time 11:00	Drilling Mud inspec. Hall	D-24 inspec. Pete Marquez	18		MARQUEZ TR	5021	1:00	Pete Marquez
	2 lds 18yds		Clean Soil	JH						
										3804
										ENTERED 405

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Pete Marquez COMPANY MARQUEZ TRUCKING - Bp SIGNATURE Pete Marquez

DATE 8-25-04

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

MANIFEST # 21717

DATE 08/25/04 JOB # 04118-001

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY				
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE	
1	Gastberg Well # 75360	LF#2 Time 6:47	drilling Mud inspec. Geogre Echebur	C-21 driver Benny W	18		Inland	17	10:51	Benny W	
1	Gastberg Well # 71060	LF#2 Time 10:33	drilling Mud inspec. Geogre Echebur	D-21 driver Benny W	18		"	"	17	3:08	Benny W
	2 1/2	18yds	Clean Soil	JH							
											3804
											ENTERED AUG 25 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Benny W

COMPANY Inland Co
Bloomfield NM

SIGNATURE Benny W
DATE 8/25/04

ENVICOTECH INC.

Bill of Lading

MANIFEST # 21718
 DATE 08/25/04 JOB # 04118-001

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy Well GB-E RPA # 80640	CF#2 time 6:38	drilling Mud inspec gearbox & blades	D20 driver	18	✓	ETEC 558			<i>[Signature]</i>
1	Gasbuggy Well GB-E RPA # 85680	CF#2 time 10:24	drilling Mud inspec gearbox & blades	D20 driver	18	✓	ETEC 558			<i>[Signature]</i>
1	Gasbuggy Well GB-E RPA # 79720	CF#2 1350	drilling Mud Tfall	D20 N. Winkler	18	✓	ETEC 558			<i>[Signature]</i>
		3/ds	Concrete							
		3/ds	fill							
									3804	
									ENTERED AUG 31 2004	

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Niel Winkler COMPANY ETEC SIGNATURE *[Signature]*

DATE 8-25-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well #B-E mud pit # 74220	LF#2 Time 6:30	Drilling Mud inspec gasportchek Concrete	E-20 driven Leroy Paul	18		Envrotech	551		Leroy Paul
1	Gasbuggy well #B-E mud pit # 76360	LF#2 Time 10:30	Drilling Mud inspec gasportchek Concrete	E-20 driven Leroy Paul	18		Envrotech	551		Leroy Paul 3777
				E-20			ENTERED AUG 26 2004			
1	Gasbuggy mud pit well #B-E # 74740	LF#2 1400	Drilling Mud T-Hall Concrete	E-20 Leroy Paul	18		Envrotech	551		Leroy Paul
1	L.F. #2	Gasbuggy	Back 7/1				Envrotech	551		Leroy Paul
2	L.F. #2	Gasbuggy	Back 7/1				Envrotech	551		Leroy Paul
3	L.F. #2	Gasbuggy	Back 7/1				Envrotech	551		Leroy Paul

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Leroy Paul COMPANY Envrotech SIGNATURE Leroy Paul

DATE 8-25-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well # 77360	L#2 time 7:40	drilling mud high pressure	D-20 drive Russell Ford	18		<i>[Signature]</i>	37		<i>[Signature]</i>
1	Gasbuggy well # 70720	L#2 time 11:20	drilling mud INSPOC JH	D-20 drive Russell Ford	18		<i>[Signature]</i>	37		<i>[Signature]</i>
2	1ds	18 yds	Clean Soil	JH						

3804

ENTERED AUG 31 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME *[Signature]*

 COMPANY *[Signature]*

 SIGNATURE *[Signature]*

 DATE 8-26-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gashussy Well GB-E mud pit # 81320	LF#2 time 6:25	Drillings MUD spec generator checked Concrete	E20	18		ETEC	558		<i>[Signature]</i>
1	Gashussy Well GB-E pit # 80640	LF#2 time 9:55	Drillings MUD spec generator Concrete	E20	18		ETEC	558		<i>[Signature]</i>
1	Gashussy Well GB-E pit A # 80840	LF#2 1330	Drillings mud Hall Concrete	Jive N. Wintonon	18		ETEC	558		<i>[Signature]</i>
3	12s	18 yds	Clean Soil	JH						3804

ENTERED AUG 31 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned generator, and that no additional materials have been added."

 NAME Neil Winterton COMPANY ETEC SIGNATURE *[Signature]*

 DATE 8-26-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gashussy well GB-E Pit # 76360	LF#2 6.24	Drilling Mud Geopore Etch Concrete	D-20	18		ENVIROTECH	549		Mike Hoyt
1	Gashussy well GB-E Pit # 75080	LF#2 9.52	Drilling Mud Geopore Etch Concrete	D-20	18		ENVIROTECH	549		Mike Hoyt
1	Gashussy well GB-E Pit # 75400	LF#2 1340	Drilling Mud T-Fall Concrete	D-20	18		ENVIROTECH	549		Mike Hoyt
3 lds	18 yds	Clean Soil		GH						3804

ENTERED AUG 31 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME Mike Hoyt

 COMPANY ENVIROTECH

 SIGNATURE Mike Hoyt

 DATE 8-26-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy Well CB-E pit A # 75250	LF#2 time 0:37	drilling mud generator Concrete	E-20	18		Envirotech	551		Larry Paul
1	Gasbuggy Well CB-E pit A # 76360	LF#2 time 10:03	drilling mud generator Concrete	E-20	18		Envirotech	551		Larry Paul
1	Gasbuggy Well CB-E pit A 76420	LF#2 1345	drilling mud THall Concrete	E-20	18		Envirotech	551		Larry Paul
1	L.F. #2	Gasbuggy	Back 711		18		Envirotech	551		Larry Paul
2	L.F. #2	Gasbuggy	Back 711		18		Envirotech	551		Larry Paul
3	L.F. #2	Gasbuggy	Back 711		18		Envirotech	551		Larry Paul

ENTERED AUG 26 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME Larry Paul

 COMPANY Envirotech

 SIGNATURE Larry Paul

 DATE 8-26-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbussy well G-2-E pit A # 76260	LF#2	drilling mud	D-20	18		Russom trucking	10	8:30	
		time 6:41	insp. George Echelune							driver John Russom
1	Gasbussy well # 77020	LF#2	drilling mud	D-21	18		" "	10	12:10	
		time 10:18	insp. George							driver John
1	Gasbussy well G-2-E pit A # 79240	LF#2	drilling mud	D-22	18		" "	10	4:30	
		1420	fall							driver John Russom
	3 lds	18yds	Clean Soil	GH						
										3809
										ENTERED AUG 5 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME _____ COMPANY Russom Trucking Inc. SIGNATURE [Signature]

DATE 8/26/04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy Well GB E pit A # 74600	LF#2 time 7:00	drillings mud impel geopac E	D23	18		MPTA Trucking	71		Bob Anderson
1	Gasbuggy Well GB E pit A # 74380	LF#2 time 10:30	drillings mud impel geopac E	D22	18		"	71		
1	Gasbuggy Well GB E pit A # 74440	LF#2 1350	drillings mud THall	E23	18		"	71		
	3 lds	18 yds	Clean Soil	JH						

3826

ENTERED SEP 09 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME Bob Anderson

 COMPANY MPTA Trucking

 SIGNATURE Bob Anderson

 DATE 8/26/04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GB-E PITA # 75746	LF#2 time 7:14	drilling mud insp. generator	O-21	18		Inland			Benny W
1	Gasbuggy well GB-E PITA # 76560	LF#2 time 10:49	drilling mud insp. generator	E-21	11		" "			Benny W
	2 lds	18 yds	Clean Soil							
										3804
										ENTERED AUG 31 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Benny W COMPANY Inland Co SIGNATURE Benny W
Blanchard NM
 DATE 8/26/04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy Well GBE pit A # 75920	LF#2 time 7:23	drilling mud inspec gearcase Hartene Eckel	E-24	10		Marquez Trucking	5021	9:05A	Pete Marquez
1	Gasbuggy Well GBE pit A # 80400	LF#2 time 11:02	drilling mud inspec gearcase	E-20	10		Marquez Trucking	5021	12:45	Pete Marquez
1	Gasbuggy Well GBE pit A # 78860	LF#2 1435	drilling mud Hall	E-22	10		Marquez Trucking	5021		Pete Marquez
	3 lds 18yds	clean soil	JH							
										3804

ENTERED AUG 31 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Pete Marquez COMPANY Marquez Trucking Co SIGNATURE Pete Marquez

DATE 8-26-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gashussy well # 75620 # 75620	LF#2 time 7:30	drilling mud inspec personnel	E-24633 driver mark	18		Enland	14	9:30	Mark Bennett
1	Gashussy well # 80020	LF#2 time 11:40	drilling mud inspec Concrete	6-21 driver Mark Bennett	18		Enland	14	2:00	Mark Bennett
	1 ld	18 yds	Clean Soil	GH						
										3804
										ENTERED AUG 31 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Mark Bennett COMPANY Enland SIGNATURE Mark Bennett

DATE 8/1/04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gashuagan well #81680 well #81680	LF#2 time 0630	drilling mud inspec. Hall	E20 N.W. Winterton	18		ETEC	558		<i>[Signature]</i>
			Concrete							
1	Gashuagan well #80720 well #80720	LF#2 time 1005	drilling mud inspec. Tudie	E20 N.W. Winterton	15		ETEC	558		<i>[Signature]</i>
			Concrete							
	2 lds	18 grds	Clean Soil	JH						
										3804
										ENTERED AUG 27 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Neil Winterton COMPANY ETEC SIGNATURE *[Signature]*

DATE 8-27-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GB-E PAA # 78440	LF#2 time 0625	Drilling Mud maps T.Hall	D-20 driver M.Holt	18		ENVIROTECH	549		Mike Holt
				Concrete						
1	Gasbuggy well GB-E Stumps # 49200	LF#2 time 1000	Drilling Mud maps T.Hall	WASH driver M.Holt	18		ENVIROTECH	549		Mike Holt
				Concrete						
	2 lds	18yds	Clean Soil	JH						
										3806
										ENTERED SEP 01 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Mike Holt COMPANY ENVIROTECH SIGNATURE Mike Holt

DATE 8-27-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Sasbuggy mud pit well 6B-E A #75800	LF#2 the 0645	Drilling Mud inspec THall	E24 driver B. Hardman	18 ✓		MP+A	71		Bob Hardman
1	Sasbuggy mud pit well 6B-E A #74800	LF#2 the 1020	Drilling Mud inspec Indie	E22 driver B. Hardman	18 ✓		" "	71		
	2 lds	18 yds	Clean Soil	JH						
										3826
										ENTERED SEP 03 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Bob Hardman COMPANY MP+A Trucking Co. SIGNATURE [Signature]

DATE 8-27-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GB-E mud pit A	LF #2	Drilling Mud	D-22	18		RLET	27		<i>[Signature]</i>
	# 75460	time 0730	inspec. Trudie	driver Russell	Ford					
1	Gasbuggy well GB-E mud pit A	LF #2	Drilling Mud	D-24	18		RLET	27		<i>[Signature]</i>
	# 75360	time 1145	inspec. Trudie	driver Russell	Ford					
1	1d 18yds	Clean Soil		JH						
										3804

ENTERED AUG 26 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

 NAME *[Signature]* COMPANY *[Signature]* SIGNATURE *[Signature]*

 DATE 8-26-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy/ Well GB-E mud pit #77700	LF#2 line 0725	drilling Mud inspec Trudie	E-24 driver Pete	18		Marquez Tr	5021	19:25	Pete Marquez
1	Gasbuggy/ Well GB-E mud pit #79000	LF#2 line 1010	drilling Mud inspec Trudie	E-24 driver Pete	18		MAR 002 TR	5021	8:30	Pete Marquez
	1 ld	18 yds	Clean Soil	JH						
										3804
										ENTERED AUG 31 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Pete Marquez COMPANY Marquez Trucking + Rep SIGNATURE Pete Marquez

DATE 8-26-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy mud pit well 60-E A # 78020	LF # 2 time 0715	drilling Mud insp T Hall	F-23 driver Mark Bennett	18		Inland	14	9:30	Mark Bennett
1	Gasbuggy mud pit well 60-E A # 76360	LF # 2 time 1120	drilling Mud insp Indie Concrete	F-23 driver Mark Bennett	18		Inland	14	1:30	Mark Bennett
										3804
										ENTERED AUG 9 1 2504

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Mark Bennett COMPANY Inland SIGNATURE Mark Bennett

DATE 8/27/04

ENVIROTECH INC.

Bill of Lading

MANIFEST # 21741

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08/27/04 JOB # 04118-001

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BELS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Casbaggy mud pit MEMOBE A # 77280	Lf #2 time 0710	drilling Mud inspec THall	E-21 Jura BennyW	20 18		Inland		9:30	BennyW
1	Casbaggy mud pit MEMOBE A # 75220	Lf #2 time 1035	drilling Mud inspec Truck	E-21 Jura BennyW	20 18		" "		1:40	BennyW
	1 ld 18 yds	Clean Soil		JH						
										3804

ENTERED AUG 31 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Benny JASON Holden COMPANY Inland SIGNATURE Jason Holden

ENVIROTECH, INC. DATE 8-27-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy mud pit well GBE A # 76860	LF #2 time 0635	Dilling Mud inspec. F. Hall	E-20 driver L. Paul	18		Envrotech	551		L. Paul
			Concrete							
1	Gasbuggy mud pit well GBE A # 75520	LF #2 time 1015	Dilling Mud inspec. Trudie	E-20 driver Leroy Paul	18		Envrotech	551		L. Paul
			Concrete							
1	L. F. #2	Gasbuggy	Back Fill		18		Envrotech	551		L. Paul
2	L. F. #2	Gasbuggy	Back Fill		18		Envrotech	551		L. Paul
										3804
										ENTERED AUG 31 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Leroy Paul COMPANY Envrotech SIGNATURE L. Paul

DATE 8-22-04

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLS	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gashussy well GB-E PIVA #77160	LF#2 time 10:30	Drillings mud w/ spec gear [REDACTED]	E20 Diner Lenny Paul	18		Envirotech	537		Lenny Paul
	Gashussy well GB-D 67140#	LF time 1540	Drillings mud Konec/Clark [REDACTED]	E20	18		Envirotech	537		Lenny Paul
2 lbs Rights Clean Soil JH										
									3806	
									ENTERED	SEP 01 2009

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Lenny Paul COMPANY Envirotech

SIGNATURE Lenny Paul

DATE 8-30-09

ENVROTECH INC.

Bill of Lading

MANIFEST # 21745 0.118-00
 DATE 08-30-04 JOB # 0504-529

PHONE: (505) 632-0615 • 5798 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbuggy well GB-E pit # 91360	LF#2 time 9:50	Drilling mud insp crayer	E 24	18 22		ETEC	558		<i>[Signature]</i>
	Gasbuggy well GB-E pit A 91740#	time 1400	Drilling mud Konrad Clark	224	18 22		ETEC	558		<i>[Signature]</i>
2 lbs 18 yds Clean soil 9#										

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Neil Winter COMPANY ETEC SIGNATURE *[Signature]*

DATE 8-30-04

Bill of Lading

MANIFEST # 21744

04118-001

PHONE: (505) 632-0615 • 5796 U.S. HIGHWAY 64 • FARMINGTON, NEW MEXICO 87401

DATE 08-21-04

JOB # 0504529

LOAD NO.	COMPLETE DESCRIPTION OF SHIPMENT						TRANSPORTING COMPANY			
	POINT OF ORIGIN	DESTINATION	MATERIAL	GRID	YDS	BBLs	COMPANY	TRK#	TIME	DRIVER SIGNATURE
1	Gasbussy Well GA-D # (25700)	LC#2 time 0833	Drilling MWD Geosync E	C2C Driver Lecroy Paul	18		Envrotech	351		<i>Lecroy Paul</i>
1 ldr 18 yds Clean soil JH										
										3806
										ENTERED SEP 01 2004

"I certify the material hauled from the above location has not been added to or mixed with, and is the same material received from the above mentioned Generator, and that no additional materials have been added."

NAME Lecroy Paul

COMPANY Envrotech

SIGNATURE *Lecroy Paul*

DATE 08-21-04

APPENDIX D

GEOPHYSICS STUDY REPORT





GEOPHYSICS

P.O. Box 36404 Albuquerque, New Mexico 87176 (505) 922-1140

20 August 2004

Ms. Susan Evans
Stoller-Navaro
7710 W. Cheyenne Ave.
Las Vegas, NV 89129

Reference: Geophysical Investigation – Project Gasbuggy Site

Dear Ms. Evans,

It was a pleasure to meet you at the Gasbuggy Site on 12 August 2004.

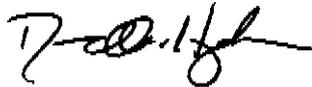
On that day we conducted a geophysical investigation utilizing a Geonics EM-61 high resolution metal locator and a Sensors & Software *Noggin* 250 MHz ground penetrating radar (GPR) system. These two surveys were conducted by acquiring data along north – south traverses separated by 5 ft over an area of approximately 200 ft by 200 ft. These data were analyzed immediately after acquisition and a briefing was presented to on-site project management.

The EM-61 survey was successful in providing a detailed image of the buried metal as shown in the first attached figure. This figure reveals subsurface metal objects under the bulk of the area. The response from these buried objects is relatively mild, suggesting that the buried metallic objects are similar to cabling, wire, and small debris that can be observed on the surface. The depths of burial for selected objects are annotated on the figure, and range from just below the surface to approximately 6 ft.

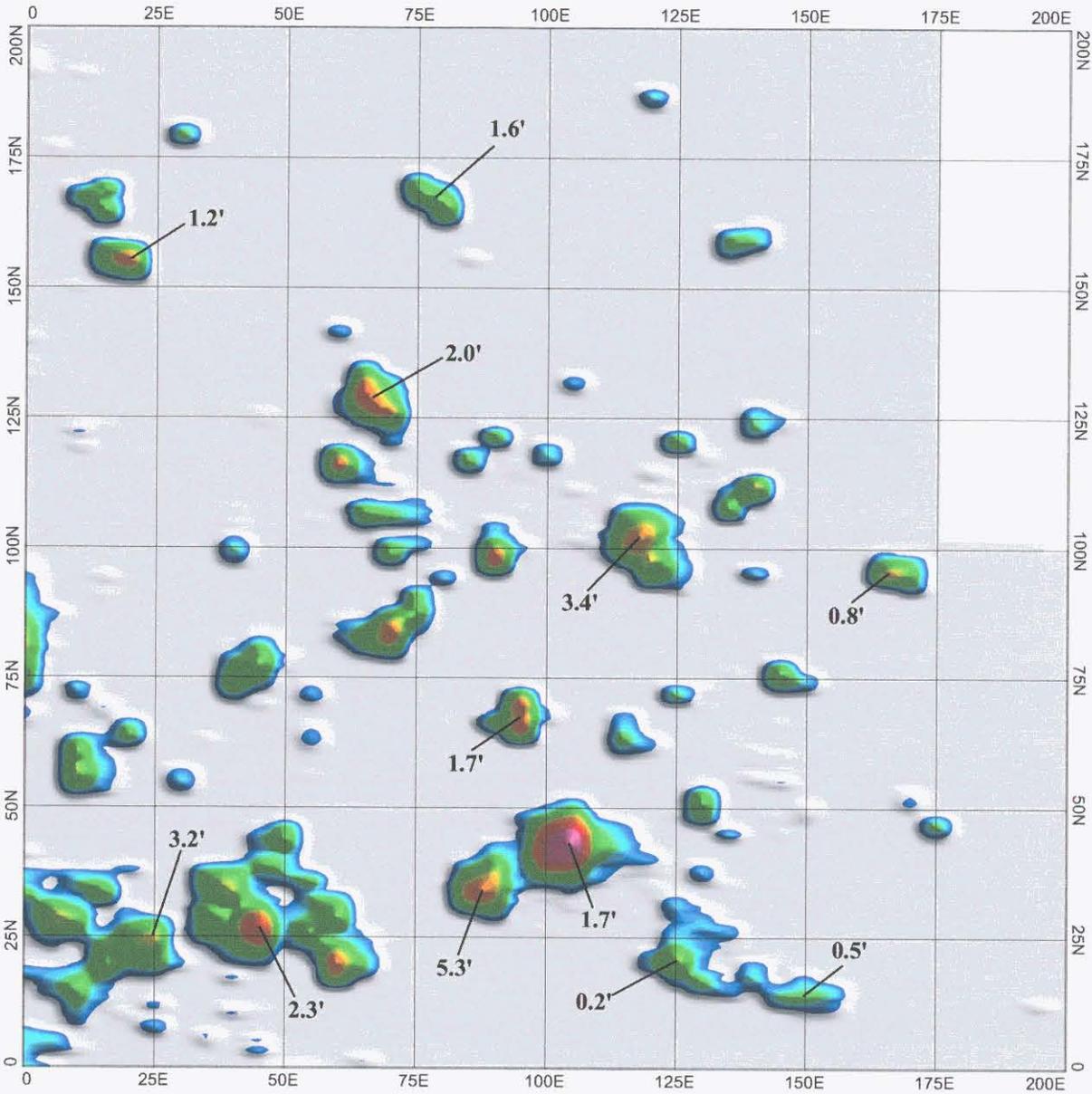
The GPR survey was not successful in acquiring a subsurface image of the grout layer found by excavation. It is most likely that the daily watering of the site for dust suppression generated near-surface conditions that were very dispersive of the GPR signal, and penetration was limited to less than 3 ft. Example GPR profiles are provided on the second attached figure. A strong near-surface feature was detected along Line 70E, which was identified by Mr. Tim Echelard as a sampling trench from an earlier characterization effort. There is no indication of the grout layer along Line 100E in the location where on-site personnel indicated this layer had been detected by excavation.

Many thanks for the opportunity to assist in your efforts at the Project Gasbuggy Site.
An Invoice for our services is enclosed. Please call if you have questions or need further
information on our activities.

Sincerely,

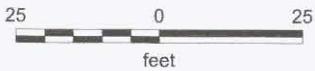


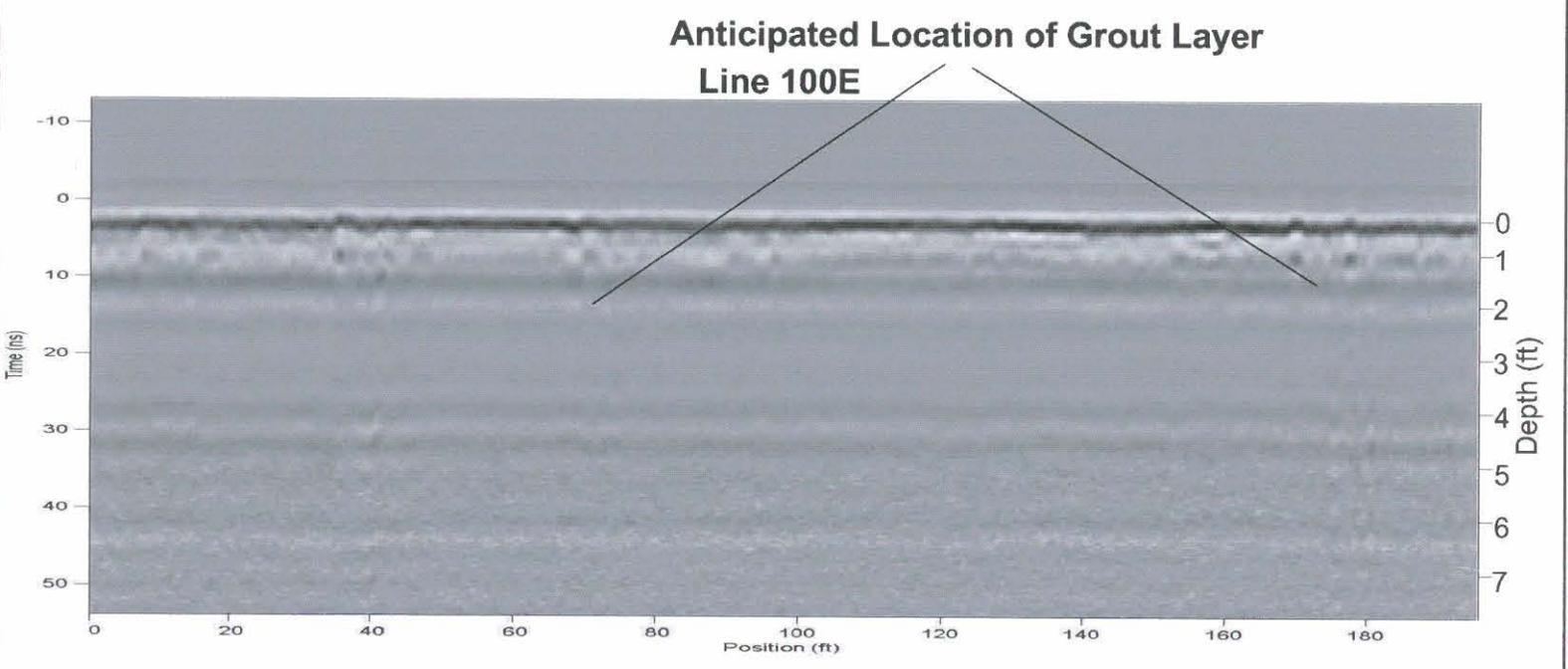
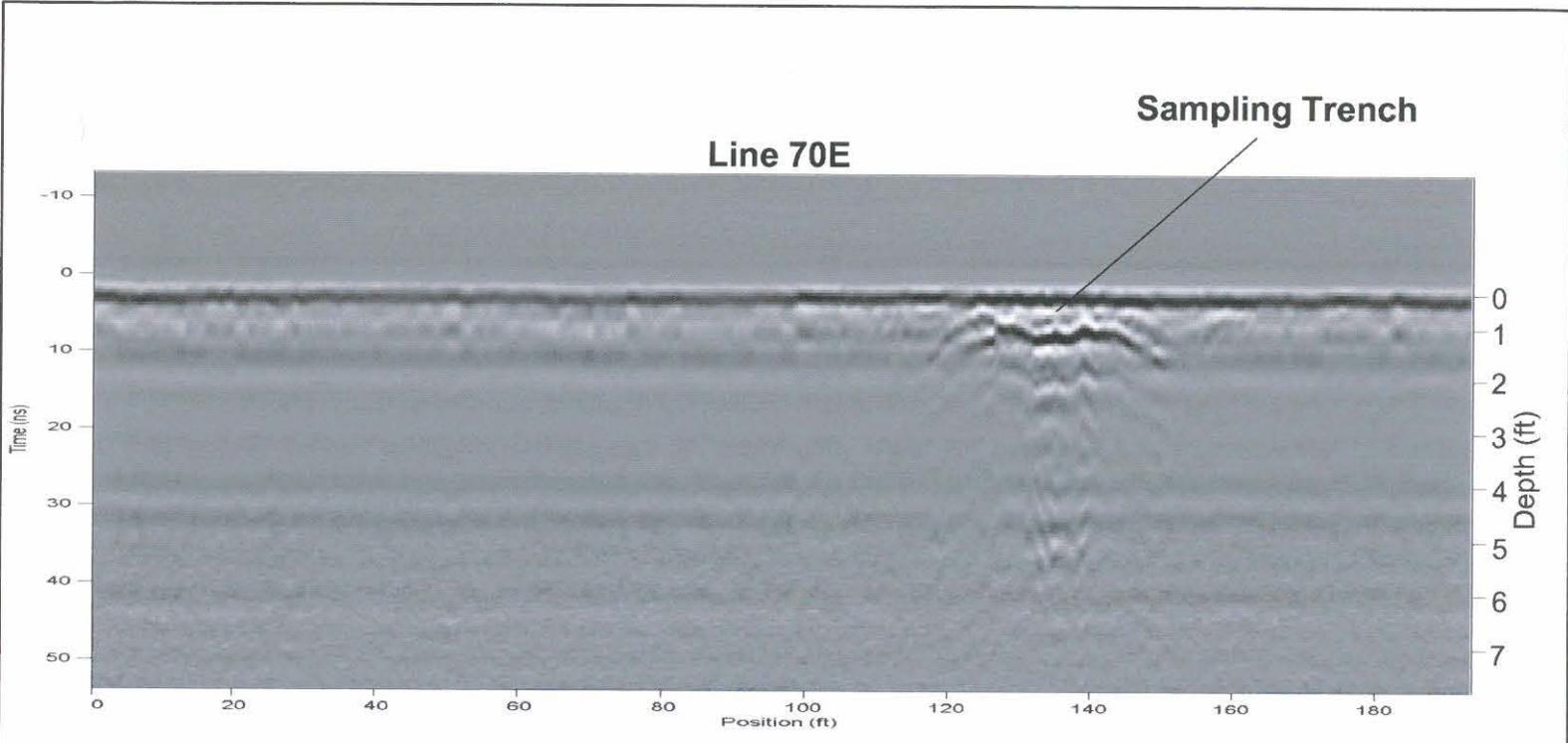
David A. Hyndman
Principal Geophysicist



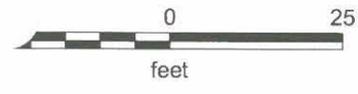
2.5' = depth of burial

Project Gasbuggy Site
EM-61 Response (Buried Metal)





Project Gasbuggy Site
Sample GPR Profiles



APPENDIX E

LABORATORY ANALYTICAL REPORTS



LOCATION	SAMPLE	SAMPLE DATE	MATRIX	TEST	CASNO	PARM	RESULT	UNITS	DETECT LIMIT	DILUTION FACTOR
GASBUGGY	1024E012	8/19/2004	soil	EPA8015	68334-30-5	DRO	5.5	MG/KG	5.5	1
GASBUGGY	1024E013	8/19/2004	soil	EPA8015	68334-30-5	DRO	5.4	MG/KG	5.4	1
GASBUGGY	1024E014	8/19/2004	soil	EPA8015	68334-30-5	DRO	35	MG/KG	5.3	1
GASBUGGY	1024E015	8/19/2004	soil	EPA8015	68334-30-5	DRO	5.2	MG/KG	5.2	1
GASBUGGY	1024E016	8/19/2004	soil	EPA8015	68334-30-5	DRO	5.2	MG/KG	5.2	1
GASBUGGY	1024E017	8/19/2004	soil	EPA8015	68334-30-5	DRO	4.8	MG/KG	5.8	1
GASBUGGY	1024E018	8/19/2004	soil	EPA8015	68334-30-5	DRO	14	MG/KG	5.8	1
GASBUGGY	1024E019	8/19/2004	soil	EPA8015	68334-30-5	DRO	13	MG/KG	5.7	1
GASBUGGY	1024E020	8/19/2004	soil	EPA8015	68334-30-5	DRO	5.3	MG/KG	5.3	1
GASBUGGY	1024E021	8/19/2004	soil	EPA8015	68334-30-5	DRO	5.5	MG/KG	5.5	1
GASBUGGY	1024D012	8/19/2004	soil	EPA8015	68334-30-5	DRO	5.7	MG/KG	5.7	1
GASBUGGY	1024D013	8/19/2004	soil	EPA8015	68334-30-5	DRO	5.6	MG/KG	5.6	1
GASBUGGY	1024D014	8/19/2004	soil	EPA8015	68334-30-5	DRO	5.9	MG/KG	5.9	1
GASBUGGY	1024D015	8/19/2004	soil	EPA8015	68334-30-5	DRO	19	MG/KG	5.5	1
GASBUGGY	1024D016	8/19/2004	soil	EPA8015	68334-30-5	DRO	7.7	MG/KG	5.5	1
GASBUGGY	1024D017	8/19/2004	soil	EPA8015	68334-30-5	DRO	110	MG/KG	5.3	1
GASBUGGY	1024D018	8/19/2004	soil	EPA8015	68334-30-5	DRO	3.4	MG/KG	5.5	1
GASBUGGY	1024D019	8/19/2004	soil	EPA8015	68334-30-5	DRO	10	MG/KG	5.1	1
GASBUGGY	1024D020	8/19/2004	soil	EPA8015	68334-30-5	DRO	14	MG/KG	5.1	1
GASBUGGY	1024D021	8/19/2004	soil	EPA8015	68334-30-5	DRO	21	MG/KG	5.4	1
GASBUGGY	1024D022	8/19/2004	soil	EPA8015	68334-30-5	DRO	5	MG/KG	5	1
GASBUGGY	1024D023	8/19/2004	soil	EPA8015	68334-30-5	DRO	6.9	MG/KG	5.2	1
GASBUGGY	1024E012	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.55	MG/KG	0.55	1
GASBUGGY	1024E013	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.54	MG/KG	0.54	1
GASBUGGY	1024E014	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.53	MG/KG	0.53	1
GASBUGGY	1024E015	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.51	MG/KG	0.51	1
GASBUGGY	1024E016	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.53	MG/KG	0.53	1
GASBUGGY	1024E017	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.57	MG/KG	0.57	1
GASBUGGY	1024E018	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.98	MG/KG	0.59	1
GASBUGGY	1024E019	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.76	MG/KG	0.56	1
GASBUGGY	1024E020	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.53	MG/KG	0.53	1
GASBUGGY	1024E021	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.53	MG/KG	0.53	1
GASBUGGY	1024E022	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.54	MG/KG	0.54	1
GASBUGGY	1024D012	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.57	MG/KG	0.57	1
GASBUGGY	1024D013	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.56	MG/KG	0.56	1

GASBUGGY	1024D014	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.59	MG/KG	0.59	1
GASBUGGY	1024D015	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.55	MG/KG	0.55	1
GASBUGGY	1024D016	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.55	MG/KG	0.55	1
GASBUGGY	1024D017	8/19/2004	soil	EPAG8015	8006-61-9	GRO	1	MG/KG	0.53	1
GASBUGGY	1024D019	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.52	MG/KG	0.52	1
GASBUGGY	1024D020	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.51	MG/KG	0.51	1
GASBUGGY	1024D021	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.54	MG/KG	0.54	1
GASBUGGY	1024D022	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.5	MG/KG	0.5	1
GASBUGGY	1024D023	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.52	MG/KG	0.52	1
GASBUGGY	1024D018	8/19/2004	soil	EPAG8015	8006-61-9	GRO	0.55	MG/KG	0.55	1
GASBUGGY	1024E022	8/19/2004	soil	EPA8015	68334-30-5	DRO	5.3	MG/KG	5.3	1
GASBUGGY	1024A014	8/26/2004	soil	EPAG8015	8006-61-9	GRO	0.57	MG/KG	0.57	1
GASBUGGY	1024A016	8/26/2004	soil	EPAG8015	8006-61-9	GRO	0.57	MG/KG	0.57	1
GASBUGGY	1024A017	8/26/2004	soil	EPAG8015	8006-61-9	GRO	0.55	MG/KG	0.55	1
GASBUGGY	1024A020	8/26/2004	soil	EPAG8015	8006-61-9	GRO	0.54	MG/KG	0.54	1
GASBUGGY	1024A018	8/26/2004	soil	EPAG8015	8006-61-9	GRO	200	MG/KG	5.7	50
GASBUGGY	1024A019	8/26/2004	soil	EPAG8015	8006-61-9	GRO	4.3	MG/KG	0.53	1
GASBUGGY	1024A021	8/26/2004	soil	EPAG8015	8006-61-9	GRO	16	MG/KG	0.54	1
GASBUGGY	1024A022	8/26/2004	soil	EPAG8015	8006-61-9	GRO	0.55	MG/KG	0.55	1
GASBUGGY	1024A024	8/26/2004	soil	EPAG8015	8006-61-9	GRO	0.54	MG/KG	0.54	1
GASBUGGY	1024A025	8/26/2004	soil	EPAG8015	8006-61-9	GRO	0.54	MG/KG	0.54	1
GASBUGGY	1024A026	8/26/2004	soil	EPAG8015	8006-61-9	GRO	0.54	MG/KG	0.54	1
GASBUGGY	1024D017A	8/26/2004	soil	EPAG8015	8006-61-9	GRO	0.52	MG/KG	0.52	1
GASBUGGY	1024A023	8/26/2004	soil	EPAG8015	8006-61-9	GRO	0.53	MG/KG	0.53	1
GASBUGGY	1024A027	8/26/2004	soil	EPAG8015	8006-61-9	GRO	80	MG/KG	5.9	50
GASBUGGY	1024A015	8/26/2004	soil	EPAG8015	8006-61-9	GRO	0.57	MG/KG	0.57	1
GASBUGGY	1024A025	8/26/2004	soil	EPA8015	68334-30-5	DRO	380	MG/KG	5.4	1
GASBUGGY	1024M013	8/25/2004	soil	EPAG8015	8006-61-9	GRO	0.52	MG/KG	0.52	1
GASBUGGY	1024M014	8/25/2004	soil	EPAG8015	8006-61-9	GRO	0.55	MG/KG	0.55	1
GASBUGGY	1024M015	8/25/2004	soil	EPAG8015	8006-61-9	GRO	0.56	MG/KG	0.56	1
GASBUGGY	1024M016	8/25/2004	soil	EPAG8015	8006-61-9	GRO	0.52	MG/KG	0.52	1
GASBUGGY	1024M017	8/25/2004	soil	EPAG8015	8006-61-9	GRO	0.6	MG/KG	0.6	1
GASBUGGY	1024M016	8/25/2004	soil	EPA8015	68334-30-5	DRO	70	MG/KG	5.2	1
GASBUGGY	1024M017	8/25/2004	soil	EPA8015	68334-30-5	DRO	26	MG/KG	6	1
GASBUGGY	1024M018	8/25/2004	soil	EPA8015	68334-30-5	DRO	39	MG/KG	6.3	1
GASBUGGY	1024M012	8/25/2004	soil	EPA8015	68334-30-5	DRO	5.4	MG/KG	5.4	1
GASBUGGY	1024M013	8/25/2004	soil	EPA8015	68334-30-5	DRO	910	MG/KG	5.3	1

GASBUGGY	1024M014	8/25/2004	soil	EPA8015	68334-30-5	DRO	5.6	MG/KG	5.6	1
GASBUGGY	1024M015	8/25/2004	soil	EPA8015	68334-30-5	DRO	2200	MG/KG	56	10
GASBUGGY	1024M019	8/25/2004	soil	EPA8015	68334-30-5	DRO	170	MG/KG	6.8	1
GASBUGGY	1024M020	8/25/2004	soil	EPA8015	68334-30-5	DRO	770	MG/KG	6.1	1
GASBUGGY	1024M021	8/25/2004	soil	EPA8015	68334-30-5	DRO	140	MG/KG	5.5	1
GASBUGGY	1024M022	8/25/2004	soil	EPA8015	68334-30-5	DRO	24	MG/KG	5.3	1
GASBUGGY	1024M012	8/25/2004	soil	EPAG8015	8006-61-9	GRO	0.54	MG/KG	0.54	1
GASBUGGY	1024M018	8/25/2004	soil	EPAG8015	8006-61-9	GRO	0.63	MG/KG	0.63	1
GASBUGGY	1024M019	8/25/2004	soil	EPAG8015	8006-61-9	GRO	0.83	MG/KG	0.65	1
GASBUGGY	1024M020	8/25/2004	soil	EPAG8015	8006-61-9	GRO	18	MG/KG	0.62	1
GASBUGGY	1024M021	8/25/2004	soil	EPAG8015	8006-61-9	GRO	0.55	MG/KG	0.55	1
GASBUGGY	1024M022	8/25/2004	soil	EPAG8015	8006-61-9	GRO	0.52	MG/KG	0.52	1
GASBUGGY	1024M020RR1	8/25/2004	soil	EPAG8015	8006-61-9	GRO	0.81	MG/KG	0.62	1
GASBUGGY	1024A014	8/26/2004	soil	EPA8015	68334-30-5	DRO	5.7	MG/KG	5.7	1
GASBUGGY	1024A015	8/26/2004	soil	EPA8015	68334-30-5	DRO	5.7	MG/KG	5.7	1
GASBUGGY	1024A016	8/26/2004	soil	EPA8015	68334-30-5	DRO	5.7	MG/KG	5.7	1
GASBUGGY	1024A017	8/26/2004	soil	EPA8015	68334-30-5	DRO	200	MG/KG	5.5	1
GASBUGGY	1024A022	8/26/2004	soil	EPA8015	68334-30-5	DRO	5.6	MG/KG	5.6	1
GASBUGGY	1024A023	8/26/2004	soil	EPA8015	68334-30-5	DRO	5.3	MG/KG	5.3	1
GASBUGGY	1024A024	8/26/2004	soil	EPA8015	68334-30-5	DRO	80	MG/KG	5.5	1
GASBUGGY	1024A026	8/26/2004	soil	EPA8015	68334-30-5	DRO	56	MG/KG	5.3	1
GASBUGGY	1024A027	8/26/2004	soil	EPA8015	68334-30-5	DRO	1600	MG/KG	12	2
GASBUGGY	1024D017A	8/26/2004	soil	EPA8015	68334-30-5	DRO	5.4	MG/KG	5.4	1
GASBUGGY	1024A018	8/26/2004	soil	EPA8015	68334-30-5	DRO	6000	MG/KG	290	50
GASBUGGY	1024A019	8/26/2004	soil	EPA8015	68334-30-5	DRO	940	MG/KG	5.6	1
GASBUGGY	1024A020	8/26/2004	soil	EPA8015	68334-30-5	DRO	640	MG/KG	5.4	1
GASBUGGY	1024A021	8/26/2004	soil	EPA8015	68334-30-5	DRO	310	MG/KG	5.5	1
GASBUGGY	1024A025A	8/30/2004	soil	EPA8015	68334-30-5	DRO	18	MG/KG	5.1	1
GASBUGGY	1024A020A	8/30/2004	soil	EPA8015	68334-30-5	DRO	26	MG/KG	5.2	1
GASBUGGY	1024A021A	8/30/2004	soil	EPA8015	68334-30-5	DRO	16	MG/KG	5.3	1
GASBUGGY	1024A017A	8/30/2004	soil	EPA8015	68334-30-5	DRO	33	MG/KG	5.1	1
GASBUGGY	1024A018A	8/30/2004	soil	EPA8015	68334-30-5	DRO	26	MG/KG	5.2	1
GASBUGGY	1024A020A	8/30/2004	soil	EPAG8015	8006-61-9	GRO	0.52	MG/KG	0.52	1
GASBUGGY	1024A021A	8/30/2004	soil	EPAG8015	8006-61-9	GRO	0.53	MG/KG	0.53	1
GASBUGGY	1024A025A	8/30/2004	soil	EPAG8015	8006-61-9	GRO	0.51	MG/KG	0.51	1
GASBUGGY	1024A017A	8/30/2004	soil	EPAG8015	8006-61-9	GRO	0.51	MG/KG	0.51	1
GASBUGGY	1024A018A	8/30/2004	soil	EPAG8015	8006-61-9	GRO	0.52	MG/KG	0.52	1

GASBUGGY	1024A019A	8/30/2004	soil	EPAG8015	8006-61-9	GRO	0.52	MG/KG	0.52	1
GASBUGGY	1024A019A	8/30/2004	soil	EPA8015	68334-30-5	DRO	34	MG/KG	5.2	1
GASBUGGY	1024M020A	8/31/2004	soil	EPAG8015	8006-61-9	GRO	0.54	MG/KG	0.54	1
GASBUGGY	1024M021A	8/31/2004	soil	EPAG8015	8006-61-9	GRO	0.51	MG/KG	0.51	1
GASBUGGY	1024M013A	8/31/2004	soil	EPA8015	68334-30-5	DRO	5.3	MG/KG	5.3	1
GASBUGGY	1024M015A	8/31/2004	soil	EPA8015	68334-30-5	DRO	5.3	MG/KG	5.3	1
GASBUGGY	1024M019A	8/31/2004	soil	EPA8015	68334-30-5	DRO	5.5	MG/KG	5.5	1
GASBUGGY	1024M020A	8/31/2004	soil	EPA8015	68334-30-5	DRO	45	MG/KG	5.4	1
GASBUGGY	1024M021A	8/31/2004	soil	EPA8015	68334-30-5	DRO	76	MG/KG	5.1	1
GASBUGGY	1024M023A	8/31/2004	soil	EPA8015	68334-30-5	DRO	5.5	MG/KG	5.5	1
GASBUGGY	1024M013A	8/31/2004	soil	EPAG8015	8006-61-9	GRO	0.53	MG/KG	0.53	1
GASBUGGY	1024M015A	8/31/2004	soil	EPAG8015	8006-61-9	GRO	0.53	MG/KG	0.53	1
GASBUGGY	1024M023A	8/31/2004	soil	EPAG8015	8006-61-9	GRO	0.54	MG/KG	0.54	1
GASBUGGY	1024M019A	8/31/2004	soil	EPAG8015	8006-61-9	GRO	0.55	MG/KG	0.55	1

APPENDIX F

CERTIFICATION OF CLEAN FILL



ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

RECEIVED

SEP 20 2004

ACCT. S-N

September 17, 2004

Project No. 04118-001

Ms. Mia Shelton
Stoller-Navarro
7710 W. Cheyenne Ave., Bldg 3
Las Vegas, NV 89129

Phone: (702) 295-0929
Fax: (702) 295-1906

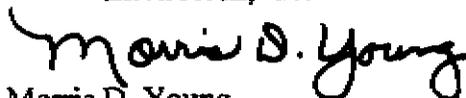
RE: CERTIFICATION OF CLEAN FILL

Dear Ms. Shelton:

Attached is copy of a previous certification of the clean fill that was provided to Stoller-Navarro for backfill at the Gas Buggy Project. As you can see from this analysis this is virgin soil that has been mined specifically for backfill.

If you should need additional information or have any question, please feel free to contact our office at (800) 362-1879.

Sincerely,
Envirotech, Inc.



Morris D. Young
President
myoung@envirotech-inc.com

Attachment

MDY:jno/office/client-LF/04118Stoller-Navarro/04118-001/091704MSheltonCvrLtr.doc

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

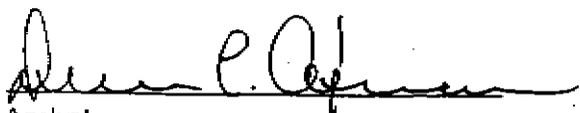
Client:	Giant Retail	Project #:	01093-016
Sample ID:	Clean Fill	Date Reported:	04-15-04
Laboratory Number:	28374	Date Sampled:	04-14-04
Chain of Custody No:	12005	Date Received:	04-14-04
Sample Matrix:	Soil	Date Extracted:	04-15-04
Preservative:	Cool	Date Analyzed:	04-15-04
Condition:	Cool and Intact	Analysis Requested:	8015 TPH

Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	ND	0.2
Diesel Range (C10 - C28)	ND	0.1
Total Petroleum Hydrocarbons	ND	0.2

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: Tes Nos lah Etec Stockpile.


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA Method 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

Quality Assurance Report

Client:	QA/QC	Project #:	N/A
Sample ID:	04-15-TPH QA/QC	Date Reported:	0415-04
Laboratory Number:	28364	Date Sampled:	N/A
Sample Matrix:	Methylene Chloride	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	04-15-04
Condition:	N/A	Analysis Requested:	TPH

Gasoline Range C5 - C10	02-19-04	1.8501E-002	1.8572E-002	0.16%	0 - 16%
Diesel Range C10 - C28	02-19-04	1.5507E-002	1.5492E-002	0.16%	0 - 15%

Gasoline Range C5 - C10	ND	0.2
Diesel Range C10 - C28	ND	0.1
Total Petroleum Hydrocarbons	ND	0.2

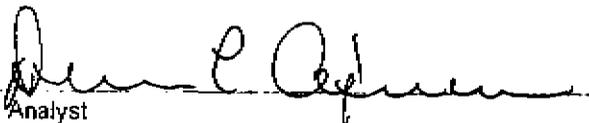
Gasoline Range C5 - C10	ND	ND	0.0%	0 - 36%
Diesel Range C10 - C28	ND	ND	0.0%	0 - 36%

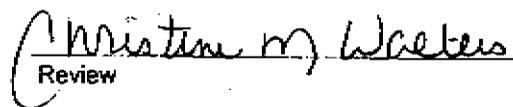
Gasoline Range C5 - C10	ND	250	250	100.0%	75 - 125%
Diesel Range C10 - C28	ND	250	250	100.0%	75 - 125%

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: QA/QC for samples 28364 - 28372, 28374.


Analyst


Review

ENVIROTECH LABS

PRactical SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Client:	Giant Retail	Project #:	01093-016
Sample ID:	Clean Fill	Date Reported:	04-15-04
Laboratory Number:	28374	Date Sampled:	04-14-04
Chain of Custody:	12005	Date Received:	04-14-04
Sample Matrix:	Soil	Date Analyzed:	04-15-04
Preservative:	Cool	Date Extracted:	04-15-04
Condition:	Cool & Intact	Analysis Requested:	BTEX

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene	ND	1.8
Toluene	ND	1.7
Ethylbenzene	ND	1.5
p,m-Xylene	ND	2.2
o-Xylene	ND	1.0
Total BTEX	ND	

ND - Parameter not detected at the stated detection limit.

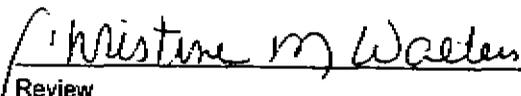
Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	98 %
	1,4-difluorobenzene	98 %
	Bromochlorobenzene	98 %

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Method 8021B, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: Tes Nos lah Etec Stockpile.


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Client:	N/A	Project #:	N/A
Sample ID:	04-15-BTEX QA/QC	Date Reported:	04-15-04
Laboratory Number:	28364	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	04-15-04
Condition:	N/A	Analysis:	BTEX

Benzene	4.2776E-002	4.2906E-002	0.3%	ND	0.2
Toluene	4.8986E-002	4.9084E-002	0.2%	ND	0.2
Ethylbenzene	7.4036E-002	7.4280E-002	0.3%	ND	0.2
p,m-Xylene	6.8275E-002	6.8480E-002	0.3%	ND	0.2
o-Xylene	5.5866E-002	5.5878E-002	0.2%	ND	0.1

Benzene	ND	ND	0.0%	0 - 30%	1.8
Toluene	ND	ND	0.0%	0 - 30%	1.7
Ethylbenzene	ND	ND	0.0%	0 - 30%	1.5
p,m-Xylene	ND	ND	0.0%	0 - 30%	2.2
o-Xylene	ND	ND	0.0%	0 - 30%	1.0

Benzene	ND	50.0	49.9	99.8%	39 - 150
Toluene	ND	50.0	49.9	99.8%	46 - 148
Ethylbenzene	ND	50.0	49.9	99.8%	32 - 160
p,m-Xylene	ND	100	99.9	99.9%	46 - 148
o-Xylene	ND	50.0	49.9	99.8%	46 - 148

ND Parameter not detected at the stated detection limit.

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.
Method 8021B, Aromatic and Halogenated Volatiles by Gas Chromatography Using Photoionization and/or Electrolytic Conductivity Detectors, SW-846, USEPA December 1996.

Comments: QA/QC for samples 28364 - 28372, 28374.

Analyst

Review

APPENDIX G

TRANSIT CERTIFICATE – WEED FREE STRAW



COLORADO DEPARTMENT OF AGRICULTURE
DIVISION OF PLANT INDUSTRY
700 Kipling Street, Suite 4000
Lakewood, Colorado 80215-8000
(303) 239-4149

**TRANSIT CERTIFICATE
WEED FREE FORAGE CROP CERTIFICATION ACT 35-27.5**

TO WHO IT MAY CONCERN:

The forage crop, to which this Transit Certificate relates, has been officially certified according to the Colorado Weed Free Forage Crop Certification Act 35-27.5. Pursuant to those standards, the information below has been included in this Transit Certificate concerning said certification. The Certificate of Inspection relating to said forage crop is on file at the:

Colorado Department of Agriculture
Division of Plant Industry
700 Kipling Street, Suite 4000
Lakewood, Colorado 80215-8000
Telephone: (303) 239-4149
FAX: (303) 239-4177

PLEASE PRINT IN INK

BAR 32 RANCH Albert B. Church
Grower's Name Grower's Signature
Rio Grande
County of Origin
Identify Forage Crop Type BARLEY
1300 9/13/04
Bales Sold Date of Sale

IDENTIFICATION
INSPECTOR'S INITIALS _____
GROWER'S INITIALS A.C.
FIELD NUMBER EB-0032R-UTRQIL
DATE 9/13/04

(Identification found in upper right corner of Certificate of Inspection: Form DPI-WF-05)

FORAGE CERTIFIED ACCORDING TO THE REGIONAL WEED FREE FORAGE STANDARDS

NOTE: Forage certified under the Colorado Weed Free Forage Crop Certification Act shall be baled with at least one strand of blue and orange colored twine or galvanized wire.

GROWER MUST ISSUE WHITE COPY TO PURCHASER; MAIL PINK COPY TO DEPARTMENT OF AGRICULTURE; KEEP GREEN COPY FOR FILE FOR EACH SALE.

COLORADO DEPARTMENT OF AGRICULTURE
DIVISION OF PLANT INDUSTRY
700 Kipling Street, Suite 4000
Lakewood, Colorado 80215-8000
(303) 239-4149

TRANSIT CERTIFICATE
WEED FREE FORAGE CROP CERTIFICATION ACT 35-27.5

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Colorado Department of Agriculture
Division of Plant Industry
700 Kipling Street, Suite 4000
Lakewood, Colorado 80215-8000
Telephone: (303) 239-4149
FAX: (303) 239-4177

PLEASE PRINT IN INK

BAR 32 RANCH

Grower's Name

Albert B. Church

Grower's Signature

RIO GRANDE

County of Origin

Identify Forage Crop Type BARLEY

8000

Bales Sold

9/13/04

Date of Sale

IDENTIFICATION
INSPECTOR'S INITIALS _____

GROWER'S INITIALS A.C.

FIELD NUMBER EF-B32R-CHURCH

DATE 9/13/04

(Identification found in upper right corner of Certificate of Inspection: Form DPI-WF-05)

FORAGE CERTIFIED ACCORDING TO THE REGIONAL WEED FREE FORAGE STANDARDS

NOTE: Forage certified under the Colorado Weed Free Forage Crop Certification Act shall be baled with at least one strand of blue and orange colored twine or galvanized wire.

GROWER MUST ISSUE WHITE COPY TO PURCHASER; MAIL PINK COPY TO DEPARTMENT OF AGRICULTURE; KEEP GREEN COPY FOR FILE FOR EACH SALE.