

From: [Spry ORourke, Linda](#)
To: Daniel_Padilla@oxy.com
Cc: [Scan, OGCC](#)
Subject: Sundry 2216381
Date: Tuesday, July 10, 2012 9:41:56 AM
Attachments: [Stites 20-8 Res pit. 2216381 annotated.pdf](#)

Daniel,

Please provide clarifications requested regarding this sundry. Thanks.

Amber, please associate this document with sundry 2216381. Thanks.

Linda Spry O'Rourke
Environmental Protection Specialist, Northwest Region
Colorado Oil & Gas Conservation Commission
707 Wapiti Court
Suite 204
Rifle, CO 81650

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FORM 4 Rev 12/05

State of Colorado

Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 Phone: (303)894-2100 Fax:(303)894-2109



SUNDRY NOTICE

RECEIVED 10/04/2011

Submit original plus one copy. This form is to be used for general, technical and environmental sundry information. For proposed or completed operations, describe in full on Technical Information Page (Page 2 of this form.) Identify well or other facility by API Number or by OGCC Facility ID. Operator shall send an informational copy of all sundry notices for wells located in High Density Areas to the Local Government Designee (Rule 603b.)

1. OGCC Operator Number: 66561
2. Name of Operator: OXY USA Inc.
3. Address: 760 Horizon Drive, Suite 101
4. Contact Name: Daniel I. Padilla
5. API Number 05- 077-09922
6. Well/Facility Name: Stites (Reserve Pit)
7. Well/Facility Number 20-8
8. Location (Qtr/Qtr, Sec, Twp, Rng, Meridian): SENE, Sec 20, T9S, R94W
9. County: Mesa
10. Field Name: Buzzard
11. Federal, Indian or State Lease Number:
Survey Plat
Directional Survey
Surface Eqpmt Diagram
Technical Info Page
Other Lab data, Map

General Notice

CHANGE OF LOCATION: Attach New Survey Plat
Change of Surface Footage from Exterior Section Lines
Change of Surface Footage to Exterior Section Lines
Change of Bottomhole Footage from Exterior Section Lines
Change of Bottomhole Footage to Exterior Section Lines
GPS DATA: Date of Measurement PDOP Reading Instrument Operator's Name
CHANGE SPACING UNIT
CHANGE OF OPERATOR (prior to drilling):
CHANGE WELL NAME
ABANDONED LOCATION:
NOTICE OF CONTINUED SHUT IN STATUS
SPUD DATE:
REQUEST FOR CONFIDENTIAL STATUS
SUBSEQUENT REPORT OF STAGE, SQUEEZE OR REMEDIAL CEMENT WORK
RECLAMATION: Attach technical page describing final reclamation procedures per Rule 1004.

Technical Engineering/Environmental Notice

Notice of Intent
Report of Work Done
Intent to Recomplete (submit form 2)
Request to Vent or Flare
E&P Waste Disposal
Change Drilling Plans
Repair Well
Beneficial Reuse of E&P Waste
Gross Interval Changed?
Rule 502 variance requested
Status Update/Change of Remediation Plans
Casing/Cementing Program Change
Other: Application of diff. standard for Spills and Releases

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.

Signed: Daniel I. Padilla Date: 9/20/11 Email: daniel_padilla@oxy.com
Print Name: Daniel I. Padilla Title: Regulatory Advisor

COGCC Approved: Title: Date:

CONDITIONS OF APPROVAL, IF ANY:

TECHNICAL INFORMATION PAGE



FOR OGCC USE ONLY

- 1. OGCC Operator Number: 66561 API Number: 05-077-09922
- 2. Name of Operator: OXY USA Inc. OGCC Facility ID # 334519
- 3. Well/Facility Name: Stites (Reserve Pit) Well/Facility Number: 20-8
- 4. Location (QtrQtr, Sec, Twp, Rng, Meridian): SENE, Sec 20, T9S, R94W

This form is to be completed whenever a Sundry Notice is submitted requiring detailed report of work to be performed or completed. This form shall be transmitted within 30 days of work completed as a "subsequent" report and must accompany Form 4, page 1.

5. **DESCRIBE PROPOSED OR COMPLETED OPERATIONS**

OXY USA Inc. (Oxy) has completed reclamation of the above-mentioned reserve pit and requests to apply a different standard (see table on next page) to the COGCC Table 910-1 concentration levels for Arsenic (As). Based on post reclamation levels for As being below undisturbed background levels, Oxy's sundry requests to waive the COGCC Table 910-1 concentration for As. In this particular situation, the below the pit liner (Post Reclaim 11/04/2009) concentration for As is above COGCC Table 910-1 standards, but is below undisturbed background levels (see sampling locations on included location map).

The sampling method Oxy employed was to take a representative random grab sample for each background sample location. The analytical concentrations table identifies the COGCC Table 910-1 concentration levels, Oxy's undisturbed background concentrations, and Oxy's post reclamation concentrations (Post Reclaim 11/04/2009). Based on the background sample concentrations, Oxy's sundry notice requests to apply different standards to the COGCC Table 910-1 concentration levels.

The reclaimed pit was contoured to be level with the pad grade to minimize stormwater runoff, during operational phase of the pad. Final pad reclamation will occur at the end of the life of the pad.

7-10-2012 Notes:

- 1. Provide clarification regarding rationale for pit sampling locations and why samples were not collected along entire pit, but are clustered in one portion of the pit.
- 2. SAR and pH are elevated above Table 910-1 standards. Describe the depth of cover placed above material with elevated SAR and pH
- 3. Barium is elevated above Table 910-1 standards and the sample results from the 'Fill' sample seem to demonstrate that the barium levels are not naturally occurring. What depth were the 'post reclaim resample' and 'ost reclaim' samples collected and what changes occurred to pit contents between collection of those two samples?

Pit Reclaims - Collbran

Pad #:	Sites 20-8
Sample Date:	11/04/2009
Clearance Achieved Date:	

	Sample Identifications (mg/kg)								
	MCL (mg/kg)	Post Reclaim	Background	Fill (11/30/09)	Post Reclaim - Resample (11/30/09)	Background - N 07/20/10	Background - E 07/20/10	Background - S 07/20/10	Background - W 07/20/10
Organics in Soil									
TPH (GRO and DRO)	500	23.0	-	-	-	-	-	-	-
Benzene	0.17	0.0031	-	-	-	-	-	-	-
Toluene	85	0.0077	-	-	-	-	-	-	-
Ethylbenzene	100	<0.0013	-	-	-	-	-	-	-
Xylenes	175	0.0087	-	-	-	-	-	-	-
Organics in Soil (PAH's)									
Acenaphthene	1000	<0.011	-	-	-	-	-	-	-
Anthracene	1000	<0.0093	-	-	-	-	-	-	-
Benzo(A)anthracene	0.22	<0.0077	-	-	-	-	-	-	-
Benzo(B)fluoranthene	0.22	<0.0078	-	-	-	-	-	-	-
Benzo(K)fluoranthene	2.2	<0.012	-	-	-	-	-	-	-
Benzo(A)pyrene	0.022	<0.0074	-	-	-	-	-	-	-
Chrysene	22	<0.0091	-	-	-	-	-	-	-
Dibenzo(A,H)anthracene	0.022	<0.011	-	-	-	-	-	-	-
Fluoranthene	1000	<0.0079	-	-	-	-	-	-	-
Flourene	1000	0.030	-	-	-	-	-	-	-
Indeno(1,2,3,C,D)pyrene	0.22	<0.011	-	-	-	-	-	-	-
Napthalene	23	0.012	-	-	-	-	-	-	-
Pyrene	1000	<0.0089	-	-	-	-	-	-	-
Inorganics in Soil									
EC	<4 mmhos/cm or 2X background	2.30	0.41	-	-	-	-	-	-
SAR	<12	25.0	6.7	2.4	-	-	-	-	-
pH	6-9	11.0	7.9	8.7	-	-	-	-	-
Metals in Soils									
Arsenic	0.39	2.7	<0.32	-	4.2	2.9	4.2	4.4	3.7
Barium	15000	16,800	-	1,090	2,900	-	-	-	-
Boron (Hot Water Soluble)	2 (mg/L)	2.5	-	0.271	-	-	-	-	-
Cadmium	70	0.29	-	-	-	-	-	-	-
Chromium	12000	12.0	-	-	-	-	-	-	-
Chromium VI	23	0.36	-	-	-	-	-	-	-
Copper	3100	21.0	-	-	-	-	-	-	-
Lead	400	6.8	-	-	-	-	-	-	-
Mercury	23	0.013	-	-	-	-	-	-	-
Nickel	1600	11.0	-	-	-	-	-	-	-
Selenium	390	<0.32	-	-	-	-	-	-	-
Silver	390	<0.16	-	-	-	-	-	-	-
Zinc	23000	40.0	-	-	-	-	-	-	-



OXY USA Inc.
760 Horizon Drive, Suite 101
Grand Junction, CO 81506

Stites 20-8 Reserve Pit Sampling Map

Mesa County, Colorado
0 0.0050.010.0150.02 Miles



Pit Sample Locations ●
Background sample locations ●
Approximate Location of Pit



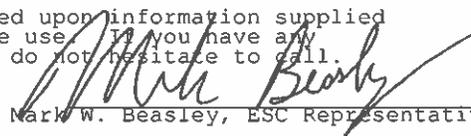
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Brett Kennedy
OXY USA Inc - Grand Junction, CO
760 Horizon Dr., Ste. 101
Grand Junction, CO 81506

Report Summary
Wednesday November 11, 2009
Report Number: L430535
Samples Received: 11/05/09
Client Project:
Description: Pit Reclaims - Collbran

The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Entire Report Reviewed By:


Mark W. Beasley, ESC Representative

Laboratory Certification Numbers

A2LA - 1461-01, AIHA - 100789, AL - 40660, CA - I-2327, CT - PH-0197, FL - E87487
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REPORT OF ANALYSIS

November 11, 2009

Brett Kennedy
OXY USA Inc - Grand Junction, CO
760 Horizon Dr., Ste. 101
Grand Junction, CO 81506

Date Received : November 05, 2009
Description : Pit Reclaims - Collbran
Sample ID : STITES 20-8 POST REC
Collected By : Brett Kennedy
Collection Date : 11/04/09 12:35

ESC Sample # : L430535-01

Site ID :

Project # :

Parameter	Result	MDL	RDL	Units	Q	Method	Date	Dil.
Chromium, Hexavalent	0.36	0.10	2.0	mg/kg	J	3060A/7	11/07/09	1
ORP	81.			mV		2580	11/10/09	1
pH	11.			su		9045D	11/06/09	1
Sodium Adsorption Ratio	25.					Calc.	11/04/09	1
Specific Conductance	2300			umhos/cm		9050AMo	11/09/09	1
Mercury	0.013	0.0025	0.020	mg/kg	J	7471	11/09/09	1
Arsenic	2.7	0.32	1.0	mg/kg		6010B	11/09/09	1
Cadmium	0.29	0.040	0.25	mg/kg		6010B	11/09/09	1
Chromium	12.	0.085	0.50	mg/kg		6010B	11/09/09	1
Copper	21.	0.21	1.0	mg/kg		6010B	11/09/09	1
Lead	6.8	0.090	0.25	mg/kg		6010B	11/09/09	1
Nickel	11.	0.26	1.0	mg/kg		6010B	11/09/09	1
Selenium	U	0.32	1.0	mg/kg		6010B	11/09/09	1
Silver	U	0.16	0.50	mg/kg		6010B	11/09/09	1
Zinc	40.	0.34	1.5	mg/kg		6010B	11/09/09	1
Benzene	0.0031	0.00090	0.0025	mg/kg		8021/80	11/10/09	5
Toluene	0.0077	0.0015	0.025	mg/kg	J	8021/80	11/10/09	5
Ethylbenzene	U	0.0013	0.0025	mg/kg		8021/80	11/10/09	5
Total Xylene	0.0087	0.0028	0.0075	mg/kg		8021/80	11/10/09	5
TPH (GC/FID) Low Fraction	U	0.14	0.50	mg/kg		GRO	11/10/09	5
Surrogate Recovery-%								
a,a,a-Trifluorotoluene (FID)	98.2			% Rec.		8021/80	11/10/09	5
a,a,a-Trifluorotoluene (PID)	102.			% Rec.		8021/80	11/10/09	5
TPH (GC/FID) High Fraction	23.	1.3	4.0	mg/kg		3546/DR	11/07/09	1
Surrogate recovery(%)								
o-Terphenyl	76.0			% Rec.		3546/DR	11/07/09	1
Polynuclear Aromatic Hydrocarbons								
Anthracene	U	0.0093	0.033	mg/kg		8270C	11/06/09	1
Acenaphthene	U	0.011	0.033	mg/kg		8270C	11/06/09	1
Acenaphthylene	U	0.011	0.033	mg/kg		8270C	11/06/09	1
Benzo(a)anthracene	U	0.0077	0.033	mg/kg		8270C	11/06/09	1
Benzo(a)pyrene	U	0.0074	0.033	mg/kg		8270C	11/06/09	1
Benzo(b)fluoranthene	U	0.0078	0.033	mg/kg		8270C	11/06/09	1
Benzo(g,h,i)perylene	U	0.0095	0.033	mg/kg		8270C	11/06/09	1

U = ND (Not Detected)

MDL = Minimum Detection Limit = LOD

RDL = Reported Detection Limit = LOQ = PQL = EQL

Note:

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L430535-01 (PH) - 11019.6c



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REPORT OF ANALYSIS

Brett Kennedy
OXY USA Inc - Grand Junction, CO
760 Horizon Dr., Ste. 101
Grand Junction, CO 81506

November 11, 2009

Date Received : November 05, 2009
Description : Pit Reclaims - Collbran
Sample ID : STITES 20-8 POST REC
Collected By : Brett Kennedy
Collection Date : 11/04/09 12:35

ESC Sample # : L430535-01

Site ID :

Project # :

Parameter	Result	MDL	RDL	Units	Q	Method	Date	Dil.
Benzo(k)fluoranthene	U	0.012	0.033	mg/kg		8270C	11/06/09	1
Chrysene	U	0.0091	0.033	mg/kg		8270C	11/06/09	1
Dibenz(a,h)anthracene	U	0.011	0.033	mg/kg		8270C	11/06/09	1
Fluoranthene	U	0.0079	0.033	mg/kg		8270C	11/06/09	1
Fluorene	0.030	0.0095	0.033	mg/kg	J	8270C	11/06/09	1
Indeno(1,2,3-cd)pyrene	U	0.011	0.033	mg/kg		8270C	11/06/09	1
Naphthalene	0.12	0.016	0.033	mg/kg		8270C	11/06/09	1
Phenanthrene	0.057	0.0073	0.033	mg/kg		8270C	11/06/09	1
Pyrene	U	0.0089	0.033	mg/kg		8270C	11/06/09	1
Surrogate Recovery								
Nitrobenzene-d5	59.8			% Rec.		8270C	11/06/09	1
2-Fluorobiphenyl	63.4			% Rec.		8270C	11/06/09	1
p-Terphenyl-d14	59.4			% Rec.		8270C	11/06/09	1

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L430535-01 (PH) - 11@19.6c



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REPORT OF ANALYSIS

Brett Kennedy
OXY USA Inc - Grand Junction, CO
760 Horizon Dr., Ste. 101
Grand Junction, CO 81506

November 11, 2009

Date Received : November 05, 2009
Description : Pit Reclaims -Collbran
Sample ID : STITES 20-8 BG
Collected By : Brett Kennedy
Collection Date : 11/04/09 13:00

ESC Sample # : L430535-02

Site ID :

Project # :

Parameter	Result	MDL	RDL	Units	Q	Method	Date	Dil.
pH	7.9			su		9045D	11/06/09	1
Sodium Adsorption Ratio	6.7					Calc.	11/04/09	1
Specific Conductance	410			umhos/cm		9050AMo	11/09/09	1
Arsenic	U	0.32	1.0	mg/kg		6010B	11/09/09	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL

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L430535-02 (PH) - 7.9@19.4c



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Brett Kennedy
OXY USA Inc - Grand Junction, CO
760 Horizon Dr., Ste. 101
Grand Junction, CO 81506

Report Summary
Monday December 07, 2009
Report Number: L434452
Samples Received: 12/02/09
Client Project:
Description: Pit Reclaims - Collbran

The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Entire Report Reviewed By:

Craig Cothron, ESC Representative

Laboratory Certification Numbers

A2LA - 1461-01, AIHA - 100789, AL - 40660, CA - I-2327, CT - PH-0197, FL - E87487
GA - 923, IN - C-TN-01, KY - 90010, KYUST - 0016, NC - ENV375, DW21704, ND - R-140
NJ - TN002, NJ NELAP - TN002, SC - 84004, TN - 2006, VA - 00109, WV - 233
AZ - 0612, MN - 047-999-395, NY - 11742, WI - 998093910

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REPORT OF ANALYSIS

Brett Kennedy
OXY USA Inc - Grand Junction, CO
760 Horizon Dr., Ste. 101
Grand Junction, CO 81506

December 07, 2009

Date Received : December 02, 2009
Description : Pit Reclaims - Collbran
Sample ID : STITES 20-8 FILL
Collected By : Brett Kennedy
Collection Date : 11/30/09 16:30

ESC Sample # : L434452-01

Site ID :

Project # :

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
pH	8.7		su	9045D	12/03/09	1
Sodium Adsorption Ratio	2.4			Calc.	12/04/09	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
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L434452-01 (PH) - 8.7@16.8c



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Brett Kennedy
OXY USA Inc - Grand Junction, CO
760 Horizon Dr., Ste. 101
Grand Junction, CO 81506

Report Summary

Tuesday May 11, 2010

Report Number: L458028

Samples Received: 05/08/10

Client Project:

Description: Pit Reclaims - Collbran

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Entire Report Reviewed By:

Mark W. Beasley , ESC Representative

Laboratory Certification Numbers

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GA - 923, IN - C-TN-01, KY - 90010, KYUST - 0016, NC - ENV375/DW21704, ND - R-140
NJ - TN002, NJ NELAP - TN002, SC - 84004, TN - 2006, VA - 00109, WV - 233
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REPORT OF ANALYSIS

Brett Kennedy
OXY USA Inc - Grand Junction, CO
760 Horizon Dr., Ste. 101
Grand Junction, CO 81506

May 11, 2010

Date Received : May 08, 2010
Description : Pit Reclaims - Collbran
Sample ID : STITES 20-8 POST REC 6-8 FT
Collected By : Brett Kennedy
Collection Date : 05/06/10 10:18

ESC Sample # : L458028-01
Site ID :
Project # :

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	4.2	0.32	1.0	mg/kg		6010B	05/11/10	1
Barium	2900	0.050	0.25	mg/kg		6010B	05/11/10	1

U = ND (Not Detected)

MDL = Minimum Detection Limit = LOD

RDL = Reported Detection Limit = LOQ = PQL = EQL

Note:

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Brett Kennedy
OXY USA Inc - Grand Junction, CO
760 Horizon Dr., Ste. 101
Grand Junction, CO 81506

Report Summary

Friday July 23, 2010

Report Number: L469802
Samples Received: 07/21/10
Client Project:

Description: Pit Reclaims - Collbran

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Entire Report Reviewed By:

Mark W. Beasley , ESC Representative

Laboratory Certification Numbers

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1-800-767-5859
Fax (615) 758-5859
Tax I.D. 62-0814289
Est. 1970

REPORT OF ANALYSIS

Brett Kennedy
OXY USA Inc - Grand Junction, CO
760 Horizon Dr., Ste. 101
Grand Junction, CO 81506

July 23, 2010

Date Received : July 21, 2010
Description : Pit Reclaims - Collbran
Sample ID : STITES 20-8 BG-N 0-6 IN
Collected By : Brett Kennedy
Collection Date : 07/20/10 12:31

ESC Sample # : L469802-01
Site ID :
Project # :

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	2.9	0.32	1.0	mg/kg		6010B	07/22/10	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL
Note:

The reported analytical results relate only to the sample submitted.
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Reported: 07/23/10 13:54 Printed: 07/23/10 13:54



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REPORT OF ANALYSIS

Brett Kennedy
 OXY USA Inc - Grand Junction, CO
 760 Horizon Dr., Ste. 101
 Grand Junction, CO 81506

July 23, 2010

Date Received : July 21, 2010
 Description : Pit Reclaims - Colbran
 Sample ID : STITES 20-8 BG-E 0-6 IN
 Collected By : Brett Kennedy
 Collection Date : 07/20/10 12:41

ESC Sample # : L469802-02
 Site ID :
 Project # :

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	4.2	0.32	1.0	mg/kg		6010B	07/22/10	1

U = ND (Not Detected)

MDL = Minimum Detection Limit = LOD

RDL = Reported Detection Limit = LOQ = PQL = EQL

Note:

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REPORT OF ANALYSIS

Brett Kennedy
 OXY USA Inc - Grand Junction, CO
 760 Horizon Dr., Ste. 101
 Grand Junction, CO 81506

July 23, 2010

Date Received : July 21, 2010
 Description : Pit Reclaims - Collbran
 Sample ID : STITES 20-8 BG-S 0-6 IN
 Collected By : Brett Kennedy
 Collection Date : 07/20/10 12:47

ESC Sample # : L469802-03
 Site ID :
 Project # :

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	4.4	0.32	1.0	mg/kg		6010B	07/22/10	1

U = ND (Not Detected)
 MDL = Minimum Detection Limit = LOD
 RDL = Reported Detection Limit = LOQ = PQL = EQL
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REPORT OF ANALYSIS

Brett Kennedy
OXY USA Inc - Grand Junction, CO
760 Horizon Dr., Ste. 101
Grand Junction, CO 81506

July 23, 2010

Date Received : July 21, 2010
Description : Pit Reclaims - Collbran
Sample ID : STITES 20-8 BG-W 0-6 IN
Collected By : Brett Kennedy
Collection Date : 07/20/10 12:25

ESC Sample # : L469802-04
Site ID :
Project # :

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Arsenic	3.7	0.32	1.0	mg/kg		6010B	07/22/10	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD
RDL = Reported Detection Limit = LOQ = PQL = EQL
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