



November 21, 2025

Dana Pollack  
Utah Gas Corp.  
1125 Escalante Drive  
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**RE: Facility Closure Report  
Ski 31-1  
ECMC Facility ID 315136  
ECMC Remediation Project 24242  
Rio Blanco County, Colorado**

Ms. Pollack,

Entrada Consulting Group, Inc. (Entrada) was contracted by Utah Gas Corp (UGC) to summarize site investigation conducted in support of facility closure related to the Colorado Energy and Carbon Management Commission (ECMC) Remediation Project Number 24242, evaluate remaining remediation needs, and provide recommendations regarding how to proceed. The Ski 31-1 Pad (Site) is located in Section 31, Township 2 North, Range 101 West in Rio Blanco County, Colorado.

The following narrative provides Site information and presents the results of investigation efforts to date.

#### **SITE DESCRIPTION AND PATHWAY TO GROUNDWATER EVALUATION**

The Site is located in Rangely adjacent to the Rangely Airport. Soil at the site is classified as Turley fine sandy loam. It is situated at an elevation of approximately 5,240 feet above mean sea level (ft-amsl). The nearest surface water feature, the White River, is located 0.20 miles northeast of the Site and sits approximately 10 feet lower in elevation. The nearest constructed water well is located approximately 0.40 miles northwest of the Site and sits approximately 11 feet lower in elevation than the Site. Division of Water Resources (DWR) records associated with well permit 66518 indicate a depth to water of 19 feet below ground surface (ft-bgs). Based on nearby water resources and elevation differences, depth to groundwater at the Site is estimated to measure approximately 30 feet below ground surface (ft-bgs). The information presented above combined with analytical results to date indicate that a reasonable pathway to groundwater does not appear to exist. Therefore, site investigation results are compared to ECMC Table 915-1 Residential Soil Screening Level (RSSL) standards.

## INITIAL FACILITY CLOSURE SAMPLING

On June 27, 2022, soil samples were collected in the former locations of the separator, tank battery, and historical pit. One soil sample was collected in the former location of each production equipment element at a depth of one ft-bgs. To characterize potential impacts associated with the historical pit, five soil samples were collected: one base sample at 3.5 ft-bgs and four sidewall samples at 3 ft-bgs. Additionally, three background soil samples were collected from nearby, comparable, non-impacted soil at 0.5 ft-bgs to establish native levels of inorganic constituents of concern. Analytical results of initial facility closure samples indicated exceedances of sodium adsorption ratio (SAR) beneath the east aboveground storage tank (AST), boron and specific conductivity (EC) beneath the west AST, and total petroleum hydrocarbons (TPH) and arsenic in the pit.

Initial wellhead sampling was conducted on October 26, 2022. The wellhead was cut and capped per ECMC regulations, and one soil sample was collected from the base of the wellhead excavation at 5 ft-bgs. Analytical results of the initial wellhead sample exceeded Table 915-1 standards for hexavalent chromium. See **Figure 1** for a depiction of initial sample locations and **Tables 1-3** for analytical results.

## EXCAVATION AND DELINEATION SAMPLING

On May 31, 2023, additional characterization and delineation sampling was completed. A second wellhead characterization sample was collected at 5 ft-bgs to characterize visually impacted soil, and analytical results indicated an exceedance of TPH. To delineate impacts identified beneath the east AST, eight potholes were advanced to depths of 1 and 2 ft-bgs in and around the tank area. Analytical results of the east AST investigation indicated exceedances of arsenic, SAR, and EC. To delineate impacts identified beneath the west AST, one pothole was advanced to 2 ft-bgs within the former footprint of the tank. Analytical results of the west AST investigation were compliant with Table 915-1 standards. To delineate impacts identified beneath and surrounding the former pit, four horizontal delineation potholes were advanced to 5 ft-bgs and two vertical delineation potholes were advanced to 5.5 ft-bgs in the pit investigation area. Analytical results indicated exceedances of TPH at the base and to the north and east of the pit. Additionally, three background soil samples were collected at the Site from nearby, comparable, non-impacted soil at 0.75 ft-bgs.

On August 14, 2023, impacted soil related to the pit was excavated and removed to address TPH impacts. Soil samples were collected from the base and sidewalls of the resulting excavation area. One sample was collected from the base at 15 ft-bgs and one sample was collected from each sidewall at 13 ft-bgs. Analytical results of pit excavation samples indicated TPH and boron exceedances on the south and west sidewalls. See **Figure 4** for a depiction of pit samples and **Table 3** for a summary of analytical results.

On August 16, 2023, impacted soil around the east AST was excavated and removed to address arsenic, SAR, and EC impacts. A total of five soil samples were collected from the excavation: one from the base at approximately 4 ft-bgs and one from each sidewall at approximately 3 ft-bgs. Samples were analyzed for arsenic, SAR, EC, and pH. Analytical results of the AST

excavation samples exceed Table 915-1 standards for arsenic in the east sidewall, SAR at the base, EC in the west wall and at the base, and pH in the east wall and at the base. Additionally, two background samples were collected from nearby, comparable, non-impacted soil to further characterize native levels of inorganic constituents. See **Figure 3** for a depiction of tank samples and **Table 2** for a summary of analytical results.

On October 20, 2023, impacted soil around the wellhead was excavated and removed to address TPH and hexavalent chromium impacts. One base sample was collected from the excavation at 7 ft-bgs and one sample was collected from each sidewall at 5 ft-bgs. Analytical results of wellhead excavation sampling were compliant with Table 915-1 standards. Impacted soil on the south and west sidewalls of the pit were also excavated and sampled. One sample was collected from each previously impacted sidewall at 13 ft-bgs. Analytical results of pit sidewall samples were compliant with Table 915-1 standards. See **Figure 2** for a depiction of wellhead samples and **Figure 4** for a depiction of pit samples. See **Table 1** for a summary of wellhead analytical results and **Table 3** for a summary of pit analytical results.

## SOIL ANALYSIS

All soil samples were collected into 4-ounce sample jars, sealed, labeled, placed into ice-filled coolers for preservation, then submitted following chain-of-custody procedures to Pace Analytical in Mt. Juliet, Tennessee, following chain of custody procedures, for analysis of the following parameters by the stated methods:

- Total petroleum hydrocarbons (TPH) as gasoline range organics (GRO) by United States Environmental Protection Agency (EPA) Method 8015D;
- TPH as diesel range organics (DRO) and TPH as oil range organics (ORO) by EPA Method 8015M;
- Benzene, toluene, ethylbenzene, total xylenes, naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene by EPA Method 8260B;
- Polycyclic aromatic hydrocarbons by EPA Method 8270C-SIM;
- Metals (Table 915-1 list) by EPA Method 6010B except arsenic and hexavalent chromium, which were analyzed by EPA Method 6020 and EPA Method 7199, respectively;
- Sodium Adsorption Ratio (SAR) by saturated paste method;
- Hot water soluble boron by EPA Method 6010B-NE493 Ch 2;
- pH by EPA Method 9045D; and
- Specific Conductance (EC) by EPA Method 9050A Modified.

## WELLHEAD EXCAVATION ANALYTICAL RESULTS

Laboratory soil analytical results were compared to Table 915-1 Residential Soil Screening Level (RSSL) standards. Soil analytical results reported above RSSL standards are summarized below.

- TPH was detected above the allowable limit of 500 milligrams per kilogram (mg/kg) in sample WH#2 with a value of 952 mg/kg.
- Hexavalent chromium was detected above the RSSL limit of 0.3 mg/kg in sample WH#1 with a value of 0.530 mg/kg.

- Arsenic was detected above the RSSL limit of 0.68 mg/kg in most samples. All exceedances fall within the allowable background limit of 1.25x the native arsenic value of 4.47 mg/kg.
- EC was detected above the allowable limit of 4 millimhos per centimeter (mmhos/cm) in WHE but within the allowable background limit equal to the native EC value of 5.430 mmhos/cm.
- SAR was detected above the allowable limit of 6 in samples WHS and WHE but within the allowable background limit equal to the native SAR value of 96.4.
- pH was detected above the allowable limit of 8.30 in samples WHS and WHE but within the allowable background limit equal to the native pH value of 9.91.

All remaining soil results were reported within the applicable Table 915-1 standards. Excavation soil analytical results are summarized in **Table 1**, and certified versions of laboratory analytical reports are provided separately.

### **SEPARATOR ANALYTICAL RESULTS**

Laboratory soil analytical results were compared to Table 915-1 RSSL standards. Soil analytical results reported above RSSL standards are summarized below.

- Arsenic was detected above the RSSL limit of 0.68 mg/kg the separator sample; the exceedance falls within the allowable background limit of 1.25x the native arsenic value of 4.47 mg/kg.
- SAR was detected above the allowable limit of 6 in the separator sample but within the allowable background limit equal to the native SAR value of 96.4.

All remaining soil results were reported within the applicable Table 915-1 standards. Excavation soil analytical results are summarized in **Table 1**, and certified versions of laboratory analytical reports are provided separately.

### **AST EXCAVATION ANALYTICAL RESULTS**

Laboratory soil analytical results were compared to Table 915-1 RSSL standards. Soil analytical results reported above RSSL standards are summarized below.

- Arsenic was detected above the RSSL limit of 0.68 mg/kg in all samples. Most exceedances fall within the allowable background limit of 1.25x the native arsenic value of 4.47 mg/kg.
- SAR was detected above the allowable limit of 6 in most samples. Approximately half of the exceedances fall within the allowable background limit equal to the native SAR value of 96.4.
- Boron was detected above the allowable limit of 2.0 milligrams per liter (mg/L) in sample Tank W.

- EC was detected above the allowable limit of 4 mmhos/cm in seven of the sixteen tank samples. Two exceedances fall within the allowable background limit equal to the native EC value of 5.430 mmhos/cm.
- pH was detected above the allowable limit of 8.30 in fourteen of the sixteen tank samples. Twelve exceedances fall within the allowable background limit equal to the native pH value of 9.91.

All remaining soil results were reported within the applicable Table 915-1 standards. Excavation soil analytical results are summarized in **Table 2**, and certified versions of laboratory analytical reports are provided separately.

## **PIT EXCAVATION ANALYTICAL RESULTS**

Laboratory soil analytical results were compared to Table 915-1 RSSL standards. Soil analytical results reported above RSSL standards are summarized below.

- TPH was detected above the allowable limit of 500 mg/kg in ten of the eighteen pit samples with exceedances ranging from 528 to 4240 mg/kg.
- Arsenic was detected above the RSSL limit of 0.68 mg/kg in all samples. All but two exceedances fall within the allowable background limit of 1.25x the native arsenic value of 4.47 mg/kg.
- SAR was detected above the allowable limit of 6 in sixteen of the eighteen pit samples. All exceedances fall within the allowable background limit equal to the native SAR value of 96.4.
- Boron was detected above the allowable limit of 2.0 mg/L in samples Hist Pit Swall #3 and Hist Pit Wwall #3.
- EC was detected above the allowable limit of 4 mmhos/cm in two samples. Both exceedances fall within the allowable background limit equal to the native EC value of 5.430 mmhos/cm.
- pH was detected above the allowable limit of 8.30 in eight of the eighteen pit samples. All exceedances fall within the allowable background limit equal to the native pH value of 9.91.

All remaining soil results were reported within the applicable Table 915-1 standards. Excavation soil analytical results are summarized in **Table 3**, and certified versions of laboratory analytical reports are provided separately.

## **CONCLUSIONS / RECOMMENDATIONS**

Entrada recommends that UGC request alternative allowable limits for EC, SAR, and pH equal to native levels of each constituent in accordance with Table 915-1 Footnote 1 and alternative allowable limit for arsenic equal to 1.25x the native level. Proposed alternative allowable limits are as follows: EC of 5.430 mmhos/cm, SAR of 96.4, pH of 9.91, and arsenic of 5.59 mg/kg.

Approximately 950 cubic yards of soil have been transported and disposed at Lapoint Recycling. Assuming the proposed alternative allowable limits are approved, organic soil impacts have been delineated vertically and horizontally and removed by excavation in all remediation areas. Inorganic impacts associated with the wellhead, west AST, and pit have also been delineated and removed by excavation; however, inorganic impacts remain in the east AST investigation area. SAR, EC, and pH impacts remain undelineated vertically, arsenic and pH remain undelineated horizontally to the east, and EC remains undelilneated horizontally to the west. Additional background characterization is recommended to determine whether remaining inorganic impacts are attributed to oil and gas operations at the Site. Prior to additional investigation, Entrada recommends that UGC request a reduced analyte list of SAR, EC, pH, and arsenic.

We appreciate the opportunity to assist Utah Gas Corp. Please contact me at (404) 641-8912 if you have any questions.

Sincerely,

**ENTRADA CONSULTING GROUP**



Sage Maher  
*Senior Project Geologist*



Tim Dobransky  
*Principal Scientist*

**Attachments:**

- Figure 1: Site Map
- Figure 2: Wellhead Excavation
- Figure 3: East Tank Excavation
- Figure 4: Historical Pit Excavation
- Table 1: Wellhead and Separator Data Summary Table
- Table 2: AST Data Summary Table
- Table 3: Pit Data Summary Table
- Table 4: Background data Summary Table

## **FIGURES**



**UGC**  
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Figure 1: Ski 31-1 All Samples	
Area: Rangely	API# 05-103-07976
Legal: NESE 31 2N101W 6	
10/2/2025	Drawn By: Dana Pollack
Revision Date:	Scale: none



**UGC**  
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Figure 2: Ski 31-1 Wellhead Samples	
Area: Rangely	API# 05-103-07976
Legal: NESE 31 2N101W 6	
10/2/2025	Drawn By: Dana Pollack
Revision Date:	Scale: none



**UGC**  
UTAH GAS CORP

Figure 3: East Tank Samples	
Area: Rangely	API# 05-103-07976
Legal: NESE 31 2N101W 6	
10/2/2025	Drawn By: Dana Pollack
Revision Date:	Scale: none



**UGC**  
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Figure 4: Historical Pit Samples	
Area: Rangely	API# 05-103-07976
Legal: NESE 31 2N101W 6	
10/2/2025	Drawn By: Dana Pollack
Revision Date:	Scale: none

## **TABLES**

**Table 1  
Ski 31-1 Facility Decommissioning  
Wellhead and Separator Soil Data Summary**

WELL HEAD SAMPLES									SEPARATOR		
LABORATORY DATA SUMMARY											
Sample ID	Ski 31-1 WH	Ski 31-1 WH#2	Ski 31-1 WHN	Ski 31-1 WHS	Ski 31-1 WHE	Ski 31-1 WHW	Ski 31-1 WH BOT	Ski 31-1 Sep	ECMC TABLE 915-1 CONCENTRATION LEVELS		UNITS
Sample Depth	5'	5'	5'	5'	5'	5'	7'	1'			
Longitude	-108.763579	-108.763580	-108.763583	-108.763593	-108.763562	-108.763617	-108.763583	-108.762825			
Latitude	40.097878	40.097872	40.097915	40.097863	40.097887	40.097877	40.097884	40.098228			
Sample Description	Well Head Sample #1	Well Head Sample #2	Well Head Excavation - North Wall	Well Head Excavation - South Wall	Well Head Excavation - East Wall	Well Head Excavation - West Wall	well Head Excavation - Bottom Sample	Separator Sample #1			
Sample Date	10/26/2022	5/31/2023	10/20/2023	10/20/2023	10/20/2023	10/20/2023	10/20/2023	10/20/2023	6/27/2022		
Analytical Parameters										Residential Soil Screening Level	Protection of Groundwater Screening Level
<b>TPH</b>											
TPH Gasoline Range Organics	0.609	ND	0.119	0.0854	0.089	0.0624	0.0781	0.0905			
TPH Diesel Range Organics [C10-C28]	156	385	5.38	2.71	2.47	4.87	4.01	112			
TPH Oil Range Organics [C28-C36]	146	567	22.2	7.94	5.7	14.2	9.47	220			
TOTAL TPH	303	952	27.7	10.7	8.3	19.1	13.6	332	500		mg/kg
<b>BTEX</b>											
Benzene	<0.000467	<0.00100	<0.000467	<0.000467	<0.000467	<0.000467	<0.000467	<0.000467	1.2	0.0026	mg/kg
Toluene	<0.00130	<0.00500	<0.00130	<0.00130	<0.00130	<0.00130	<0.00130	<0.00130	490	0.69	mg/kg
Ethylbenzene	<0.000737	<0.00250	<0.000737	<0.000737	<0.000737	<0.000737	<0.000737	<0.000737	5.8	0.78	mg/kg
Total Xylenes	<0.000800	<0.00650	<0.000800	<0.000800	<0.000800	<0.000800	<0.000800	<0.000800	58	9.9	mg/kg
<b>TMB</b>											
1,2,4-Trimethylbenzene	<0.00158	<0.00500	<0.00158	<0.00158	<0.00158	<0.00158	<0.00158	<0.00158	30	0.0081	mg/kg
1,3,5-Trimethylbenzene	<0.00200	<0.00500	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	27	0.0087	mg/kg
<b>Metals</b>											
Arsenic	<0.100	4.56	4.21	4.14	4.25	4.89	4.92	5.05	0.68	0.29	mg/kg
Barium	310	325	198	141	120	154	118	209	15,000	82	mg/kg
Cadmium	0.284	<1.00	0.271	0.294	0.284	0.372	0.363	0.47	71	0.38	mg/kg
Chromium (Hexavalent)	0.530J	<1.00	<0.255	<0.255	<0.255	<0.255	<0.255	<0.255	0.3	0.00067	mg/kg
Copper	9.22	8.87	8.85	9.19	9.02	11.6	13.7	3,100	46		mg/kg
Lead	12.8	14.7	9.01	8.11	8.6	9.78	10.2	11.4	400	14	mg/kg
Nickel	9.02	10.7	9.53	9.78	10.9	13	13.5	12.4	1,500	26	mg/kg
Selenium	<0.764	<2.50	0.62	0.61	0.664	0.703	0.701	<0.764	390	0.26	mg/kg
Silver	<0.127	<0.500	<0.0865	<0.0865	<0.0865	<0.0865	<0.0865	<0.127	390	0.8	mg/kg
Zinc	37.6	44.6	42.0	37.2	41.8	51.7	62.7	23,000	370		mg/kg
<b>SAR Metals Analysis</b>											
Sodium Adsorption Ratio	4.57	1.93	4.32	11.6	7.39	4.82	2.19	10.6	<6		ratio
<b>Polynuclear Aromatic Hydrocarbons</b>											
Acenaphthene	0.00232	<0.00600	<0.00209	<0.00209	<0.00209	<0.00209	<0.00209	<0.00209	360	0.55	mg/kg
Anthracene	<0.00230	<0.00600	<0.00230	<0.00230	<0.00230	<0.00230	<0.00230	<0.00230	1,800	5.8	mg/kg
Benzo(a)anthracene	<0.00173	<0.00600	<0.00173	<0.00173	<0.00173	<0.00173	<0.00173	<0.00173	1.1	0.011	mg/kg
Benzo(a)pyrene	<0.00179	<0.00600	<0.00179	<0.00179	<0.00179	<0.00179	<0.00179	<0.00179	0.11	0.24	mg/kg
Benzo(b)fluoranthene	<0.00153	<0.00600	<0.00153	<0.00153	<0.00153	<0.00153	<0.00153	<0.00153	1.1	0.3	mg/kg
Benzo(k)fluoranthene	<0.00215	<0.00600	<0.00215	<0.00215	<0.00215	<0.00215	<0.00215	<0.00215	11	2.9	mg/kg
Chrysene	0.00511	0.00654	<0.00232	<0.00232	<0.00232	<0.00232	<0.00232	<0.00232	110	9	mg/kg
Dibenzo(a,h)anthracene	<0.00172	<0.00600	<0.00172	<0.00172	<0.00172	<0.00172	<0.00172	<0.00172	0.11	0.096	mg/kg
Fluoranthene	<0.00227	<0.00600	<0.00227	<0.00227	<0.00227	<0.00227	<0.00227	<0.00227	240	8.9	mg/kg
Fluorene	0.00349	<0.00600	<0.00205	<0.00205	<0.00205	<0.00205	<0.00205	<0.00205	240	0.54	mg/kg
Indeno(1,2,3-cd)pyrene	<0.00181	<0.00600	<0.00181	<0.00181	<0.00181	<0.00181	<0.00181	<0.00181	1.1	0.98	mg/kg
1-Methylnaphthalene	0.0141	<0.0200	<0.00449	<0.00449	<0.00449	<0.00449	<0.00449	<0.00449	18	0.006	mg/kg
2-Methylnaphthalene	<0.00427	<0.0200	<0.00427	<0.00427	<0.00427	<0.00427	<0.00427	<0.00427	24	0.019	mg/kg
Naphthalene	0.00599	<0.0200	<0.00410	<0.00411	0.00479	<0.00411	<0.00411	<0.00408	2	0.0038	mg/kg
Pyrene	0.00257	<0.00600	<0.00202	<0.00203	<0.00203	<0.00203	<0.00203	<0.00200	180	1.3	mg/kg
<b>General Chemistry</b>											
Boron	0.475	0.522	1.16	1.74	1.04	0.877	0.243	0.824	2		mg/L
Specific Conductivity	0.875	0.354	3.770	0.837	4.160	2.080	1.920	1.11	<4		mmhos/cm
pH (*T8 Qualifier)	7.81	7.90	7.71	8.85	8.41	8.11	8.26	8.00	6-8.3		su

mg/kg - milligrams per kilogram  
 mg/L - milligrams per liter  
 mmhos/cm - millimhos per centimeter  
 su - standard units  
 NT - parameter was not tested

Over ECMC Table 915-1 concentration levels but under BACKGROUND level.  
 Over ECMC Table 915-1 concentration levels and not within BACKGROUND level.  
 Over ECMC Table 915-1 concentration levels  
 Background Sample



Table 3  
Ski 31-1 Facility Decommissioning  
Pit Soil Data Summary

HISTORIC PIT SAMPLES																		RESIDENTIAL SOIL SCREENING LEVEL		PROTECTION OF GROUNDWATER SCREENING LEVEL		UNITS
LABORATORY DATA SUMMARY	Ski 31-1 Bottom	Ski 31-1 Pit N	Ski 31-1 Pit E	Ski 31-1 Pit S	Ski 31-1 Pit W	Ski 31-1 Hist Pit W #2	Ski 31-1 Hist Pit E #2	Ski 31-1 Hist Pit N #2	Ski 31-1 Hist Pit S #2	Ski 31-1 E Tank BOT E#2	Ski 31-1 E Tank BOT W #2	Ski 31-1 Historic Pit Well #3	Ski 31-1 Hist Pit Well #3	Ski 31-1 Hist Pit Well #3	Ski 31-1 Hist Pit Well #3	Ski 31-1 Hist Pit Well #4	Ski 31-1 Hist Pit Well #4	Residential Soil Screening Level	Protection of Groundwater Screening Level			
Sample ID	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3					
Sample Depth	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3					
Longitude	-108.762841	-108.762841	-108.762823	-108.762848	-108.762884	-108.762894	-108.762844	-108.762844	-108.762851	-108.762834	-108.762869	-108.762849	-108.762855	-108.762902	-108.762849	-108.762881	-108.762922					
Latitude	40.098050	40.098059	40.098075	40.098039	40.098051	40.098052	40.098054	40.098054	40.098034	40.098054	40.098054	40.098054	40.098055	40.098025	40.098055	40.098051	40.098051					
Sample Description	Pit Bottom Sample #1	Pit North Wall Sample #1	Pit East Wall	Pit South Wall	Pit West Wall Sample #1	Pit West Wall Sample #2	Pit East Wall #2	Pit North Wall #2	Pit South Wall #2	MISLABELED - Bottom of historic pit east side	MISLABELED - Bottom of historic pit west side	Historic Pit North Wall Sample #3	Historic Pit South Wall Sample #3	Historic Pit East Wall Sample #3	Historic Pit West Wall Sample #3	Historic Pit Bottom Sample #3	Historic Pit South Wall Sample #4	Historic Pit West Wall Sample #4				
Sample Date	6/27/2022	6/27/2022	6/27/2022	6/27/2022	6/27/2022	5/31/2023	5/31/2023	5/31/2023	5/31/2023	5/31/2023	5/31/2023	8/14/2023	8/14/2023	8/14/2023	8/14/2023	8/14/2023	10/20/2023	10/20/2023				
Analytical Parameters																						
TPH Gasoline Range Organics	0.0764	0.0814	0.11	0.0683	0.07	<0.100	<0.100	<0.100	<0.100	0.106	<0.100	0.0953	0.0986	0.191	0.299	0.104	0.0872	0.141				
TPH Diesel Range Organics (C10-C28)	1560	275	494	1040	1400	163	214	509	66.7	123	358	142	278	130	326	116	<1.61	<1.61				
TPH Oil Range Organics (C28-C36)	2680	517	1220	1680	2760	252	314	828	99.8	201	592	239	437	186	377	184	1.56	2.39				
TOTAL TPH	4240	792	1714	2720	4160	435	566	1337	169	321	866	391	715	316	705	300	1.65	2.53				
BTEX																						
Benzene	<0.000467	<0.000467	<0.000467	<0.000467	<0.000467	<0.00100	<0.00100	<0.00100	<0.00100	<0.00100	<0.00100	<0.000467	<0.000467	<0.000467	<0.000467	<0.000467	<0.000467	<0.000467	1.2	0.026	mg/kg	
Toluene	<0.00193	<0.00193	<0.00193	<0.00193	<0.00193	<0.00500	<0.00500	<0.00500	<0.00500	<0.00500	<0.00193	<0.00193	<0.00193	<0.00193	<0.00193	<0.00193	<0.00193	<0.00193	4.9	0.68	mg/kg	
Ethylbenzene	<0.000737	<0.000737	<0.000737	<0.000737	<0.000737	<0.00250	<0.00250	<0.00250	<0.00250	<0.00250	<0.000737	<0.000737	<0.000737	<0.000737	<0.000737	<0.000737	<0.000737	<0.000737	5.8	0.78	mg/kg	
Total Xylenes	<0.000800	<0.000800	<0.000800	<0.000800	<0.000800	<0.00650	<0.00650	<0.00650	<0.00650	<0.00650	0.00625	0.00129	<0.000800	0.00180	0.00638	<0.000800	<0.000800	<0.000800	58	9.9	mg/kg	
THS																						
1,2,4-Trimethylbenzene	<0.00158	<0.00158	<0.00158	<0.00158	<0.00158	<0.00500	<0.00500	<0.00500	<0.00500	<0.00500	<0.00158	<0.00158	<0.00158	<0.00158	<0.00158	<0.00158	<0.00158	<0.00158	30	0.081	mg/kg	
1,3,5-Trimethylbenzene	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<0.00500	<0.00500	<0.00500	<0.00500	<0.00500	<0.00200	<0.00200	0.00229	0.00845	0.0391	<0.00200	<0.00200	<0.00200	27	0.0087	mg/kg	
Metals																						
Arsenic	6.22	5.31	4.88	5.70	5.09	4.25	3.91	3.75	4.48	4.76	4.64	3.81	4.33	3.78	5.11	3.75	4.35	4.15	0.68	0.29	mg/kg	
Barium	121	124	108	101	127	103	104	88	97.3	109	117	94.4	93.1	86.5	130	82.7	99.6	104	15,000	82	mg/kg	
Cadmium	0.752	0.727	0.601	0.435	0.804	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	0.26	0.287	0.262	0.347	0.239	0.268	0.246	71	0.38	mg/kg	
Chromium (Hexavalent)	<0.255	<0.255	<0.255	<0.255	<0.255	<1.00	<1.00	<1.00	<1.00	<1.00	<0.255	<0.255	<0.255	<0.255	<0.255	<0.255	<0.255	<0.255	0.3	0.0067	mg/kg	
Copper	22.4	20.5	17.7	14.9	26.9	11.6	12.1	13.8	11.9	13.5	13.7	12	10.5	15.3	10.3	11.9	12.4	3,100	46	mg/kg		
Lead	27.8	14	12.3	11.1	21.8	8.87	7.81	8.86	12.2	8.96	9.25	9.06	8.59	11.7	8.05	9.23	9.04	400	14	mg/kg		
Nickel	14.2	13.2	12.8	11.1	13.5	9.86	10	9.53	10.7	11.2	11.4	9.53	10.2	8.77	14.1	8.72	10.8	10.9	1,500	26	mg/kg	
Selenium	<0.764	<0.764	<0.764	<0.764	<0.764	<2.50	<2.50	<2.50	<2.50	<2.50	<2.50	0.363	0.441	0.364	0.517	0.28	0.422	0.407	390	0.28	mg/kg	
Silver	<0.127	<0.127	<0.127	<0.127	<0.127	<0.500	<0.500	<0.500	<0.500	<0.500	<0.0865	<0.0865	<0.0865	<0.0865	<0.0865	<0.0865	<0.0865	<0.0865	390	0.8	mg/kg	
Zinc	84.4	53.9	54.8	44.8	68.3	38.4	43.4	42.5	44.5	44.2	64.4	40	36.3	49.1	35.7	42.3	40.9	23,000	370	mg/kg		
SAR Metals Analysis																						
Sodium Adsorption Ratio	0.955	16.2	13.8	16.8	3.82	16.3	13.4	11.5	18.6	16.8	11.4	20.4	22.9	24.2	17.3	20.3	54.8	33.5	<6		rate	
Polynuclear Aromatic Hydrocarbons																						
Acenaphthene	<0.00209	<0.00209	<0.00209	<0.00209	<0.00209	<0.00600	<0.00600	<0.00600	<0.00600	<0.00600	<0.00209	<0.00209	<0.00209	<0.00209	<0.00209	<0.00209	<0.00209	<0.00209	360	0.55	mg/kg	
Anthracene	<0.00230	<0.00230	<0.00230	<0.00230	<0.00230	<0.00600	<0.00600	<0.00600	<0.00600	<0.00600	<0.00230	<0.00230	<0.00230	<0.00230	<0.00230	<0.00230	<0.00230	<0.00230	1,800	5.8	mg/kg	
Benzo(a)anthracene	<0.00179	<0.00179	<0.00179	<0.00179	<0.00179	<0.00600	<0.00600	<0.00600	<0.00600	<0.00600	<0.00179	<0.00179	<0.00179	<0.00179	<0.00179	<0.00179	<0.00179	<0.00179	1.1	0.011	mg/kg	
Benzo(a)pyrene	<0.00179	<0.00179	<0.00179	<0.00179	<0.00179	<0.00600	<0.00600	<0.00600	<0.00600	<0.00600	<0.00179	<0.00179	<0.00179	0.00205	<0.00179	<0.00179	<0.00179	<0.00179	0.11	0.24	mg/kg	
Benzo(b)fluoranthene	<0.00153	<0.00153	<0.00153	<0.00153	<0.00153	<0.00600	<0.00600	<0.00600	<0.00600	<0.00600	<0.00153	<0.00153	0.00237	<0.00153	<0.00153	<0.00153	<0.00153	<0.00153	1.1	0.3	mg/kg	
Benzo(k)fluoranthene	<0.00215	<0.00215	<0.00215	<0.00215	<0.00215	<0.00600	<0.00600	<0.00600	<0.00600	<0.00600	<0.00215	<0.00215	<0.00215	<0.00215	<0.00215	<0.00215	<0.00215	<0.00215	11	2.9	mg/kg	
Chrysene	<0.00232	<0.00232	<0.00232	<0.00232	<0.00232	<0.00600	<0.00600	<0.00600	<0.00600	<0.00600	<0.00232	<0.00232	0.00737	<0.00232	<0.00232	<0.00232	<0.00232	<0.00232	110	9	mg/kg	
Dibenz(a,h)anthracene	<0.00172	<0.00172	<0.00172	<0.00172	<0.00172	<0.00600	<0.00600	<0.00600	<0.00600	<0.00600	<0.00172	<0.00172	<0.00172	<0.00172	<0.00172	<0.00172	<0.00172	<0.00172	0.11	0.096	mg/kg	
Fluoranthene	<0.00227	<0.00227	<0.00227	<0.00227	<0.00227	<0.00600	<0.00600	<0.00600	<0.00600	0.00792	<0.00600	<0.00600	<0.00227	<0.00227	0.00717	<0.00227	<0.00227	<0.00227	240	8.9	mg/kg	
Fluorene	<0.00205	<0.00205	<0.00205	<0.00205	<0.00205	<0.00600	<0.00600	<0.00600	<0.00600	<0.00600	<0.00205	<0.00205	0.00206	<0.00205	<0.00205	<0.00205	<0.00205	<0.00205	240	0.54	mg/kg	
Indeno(1,2,3-cd)pyrene	<0.00181	<0.00181	<0.00181	<0.00181	<0.00181	<0.00600	<0.00600	<0.00600	<0.00600	<0.00600	<0.00181	<0.00181	<0.00181	<0.00181	<0.00181	<0.00181	<0.00181	<0.00181	1.1	0.98	mg/kg	
1-Methylnaphthalene	<0.00449	<0.00449	<0.00449	<0.00449	<0.00449	<0.0200	<0.0200	<0.0200	<0.0200	<0.0200	<0.00449	<0.00449	0.00633	0.0102	0.00588	<0.00449	<0.00449	<0.00449	19	0.006	mg/kg	
2-Methylnaphthalene	<0.00427	<0.00427	<0.00427	<0.00427	<0.00427	<0.0200	<0.0200	<0.0200	<0.0200	0.00711	<0.0200	<0.00427	<0.00427	0.01	0.0061	<0.00427	<0.00427	<0.00427	24	0.019	mg/kg	
Naphthalene	0.00496	<0.00408	<0.00408	<0.00408	<0.00408	<0.0200	<0.0200	<0.0200	<0.0200	<0.0200	<0.00408	<0.00408	0.00538	<0.00408	<0.00408	<0.00408	<0.00408	<0.00408	2	0.038	mg/kg	
Pyrene	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<0.00600	<0.00600	<0.00600	<0.00600	0.00847	<0.00600	<0.00200	0.0021	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	180	1.3	mg/kg	
General Chemistry																						
Boron	0.799	1.73	1.10	1.31	0.938	1.41	1.56	1.14	1.79	1.4	1.11	1.80	1.92	1.79	2.03	1.79	2.11					

**Table 4  
Ski 31-1 Facility Decommissioning  
Background Soil Data Summary**

BACKGROUND SAMPLES											
LABORATORY DATA SUMMARY									ECMC TABLE 915-1 CONCENTRATION LEVELS		UNITS
Sample ID	Ski 31-1 BGN	Ski 31-1 BGE	Ski 31-1 BGS	Ski 31-1 BGNE	Ski 31-1 BGNW	Ski 31-1 BGW	Ski 31-1 BGN#2	Ski 31-1 BGS#2			
Sample Depth	6"	6"	6"	6"	6"	9"	9"	9"			
Longitude	-108.762427	-108.762189	-108.762439	-108.761792	-108.762913	-108.763137	-108.762276	-108.762428			
Latitude	40.098630	40.098194	40.097933	40.098341	40.098507	40.098102	40.098802	40.097695			
Sample Description	Background North	Background East	Background South	Background Northeast	Background Northwest	Background West	Background North #2	Background South #2			
Sample Date	6/27/2022	6/27/2022	6/27/2022	8/16/2023	8/16/2023	5/31/2023	5/31/2023	5/31/2023			
Analytical Parameters									Residential Soil Screening Level	Protection of Groundwater Screening Level	
<b>TPH</b>											
TPH Gasoline Range Organics	NT	NT	NT	NT	NT	NT	NT	NT			
TPH Diesel Range Organics [C10-C28]	NT	NT	NT	NT	NT	NT	NT	NT	500		mg/kg
TPH Oil Range Organics [C28-C36]	NT	NT	NT	NT	NT	NT	NT	NT			
TOTAL TPH	NT	NT	NT	NT	NT	NT	NT	NT			
<b>BTEX</b>											
Benzene	NT	NT	NT	NT	NT	NT	NT	NT	1.2	0.0026	mg/kg
Toluene	NT	NT	NT	NT	NT	NT	NT	NT	490	0.69	mg/kg
Ethylbenzene	NT	NT	NT	NT	NT	NT	NT	NT	5.8	0.78	mg/kg
Total Xylenes	NT	NT	NT	NT	NT	NT	NT	NT	58	9.9	mg/kg
<b>TMB</b>											
1,2,4-Trimethylbenzene	NT	NT	NT	NT	NT	NT	NT	NT	30	0.0081	mg/kg
1,3,5-Trimethylbenzene	NT	NT	NT	NT	NT	NT	NT	NT	27	0.0087	mg/kg
<b>Metals</b>											
Arsenic	4.47	2.82	3.05	3.05	3.69	3.37	2.43	2.93	0.68	0.29	mg/kg
Barium	NT	NT	NT	NT	NT	NT	NT	NT	15,000	82	mg/kg
Cadmium	NT	NT	NT	NT	NT	NT	NT	NT	71	0.38	mg/kg
Chromium (Hexavalent)	NT	NT	NT	NT	NT	NT	<1.00	<1.00	0.3	0.00067	mg/kg
Copper	NT	NT	NT	NT	NT	NT	NT	NT	3,100	46	mg/kg
Lead	NT	NT	NT	NT	NT	NT	NT	NT	400	14	mg/kg
Nickel	NT	NT	NT	NT	NT	NT	NT	NT	1,500	26	mg/kg
Selenium	NT	NT	NT	NT	NT	NT	NT	NT	390	0.26	mg/kg
Silver	NT	NT	NT	NT	NT	NT	NT	NT	390	0.8	mg/kg
Zinc	NT	NT	NT	NT	NT	NT	NT	NT	23,000	370	mg/kg
<b>SAR Metals Analysis</b>											
Sodium Adsorption Ratio	17.3	2.02	0.713	0.713	76.2	5.20	96.4	14.6	<6		ratio
<b>Polynuclear Aromatic Hydrocarbons</b>											
Acenaphthene	NT	NT	NT	NT	NT	NT	NT	NT	360	0.55	mg/kg
Anthracene	NT	NT	NT	NT	NT	NT	NT	NT	1,800	5.8	mg/kg
Benzo(a)anthracene	NT	NT	NT	NT	NT	NT	NT	NT	1.1	0.011	mg/kg
Benzo(a)pyrene	NT	NT	NT	NT	NT	NT	NT	NT	0.11	0.24	mg/kg
Benzo(b)fluoranthene	NT	NT	NT	NT	NT	NT	NT	NT	1.1	0.3	mg/kg
Benzo(k)fluoranthene	NT	NT	NT	NT	NT	NT	NT	NT	11	2.9	mg/kg
Chrysene	NT	NT	NT	NT	NT	NT	NT	NT	110	9	mg/kg
Dibenzo(a,h)anthracene	NT	NT	NT	NT	NT	NT	NT	NT	0.11	0.096	mg/kg
Fluoranthene	NT	NT	NT	NT	NT	NT	NT	NT	240	8.9	mg/kg
Fluorene	NT	NT	NT	NT	NT	NT	NT	NT	240	0.54	mg/kg
Indeno(1,2,3-cd)pyrene	NT	NT	NT	NT	NT	NT	NT	NT	1.1	0.98	mg/kg
1-Methylnaphthalene	NT	NT	NT	NT	NT	NT	NT	NT	18	0.006	mg/kg
2-Methylnaphthalene	NT	NT	NT	NT	NT	NT	NT	NT	24	0.019	mg/kg
Napthalene	NT	NT	NT	NT	NT	NT	NT	NT	2	0.0038	mg/kg
Pyrene	NT	NT	NT	NT	NT	NT	NT	NT	180	1.3	mg/kg
<b>General Chemistry</b>											
Boron	NA	NA	NT	NT	NT	NT	NT	NT	2		mg/L
Specific Conductivity	5.430	0.598	0.415	0.415	1.240	4.150	5.340	1.050	<4		mmhos/cm
pH (*T8 Quailifier)	8.21	7.94	7.84	7.84	9.91	7.70	9.09	9.14	6-8.3		su

mg/kg - milligrams per kilogram  
 mg/L - milligrams per liter  
 mmhos/cm - millimhos per centimeter  
 su - standard units  
 NT - parameter was not tested

Over ECMC Table 915-1 concentration levels but under BACKGROUND level.

Over ECMC Table 915-1 concentration levels and not within BACKGROUND level.

Over ECMC Table 915-1 concentration levels

Background Sample