

**Laramie Energy II, LLC
Tier II Gas Wells
Quarterly Production Monitoring Report
Furr 16-22D and Furr 16-22B
Rulison Field, Garfield County, Colorado
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1.0 Introduction

Laramie Energy II, LLC (Laramie Energy II) is developing natural gas resources in the vicinity of Jack's Pocket on the north flank of Battlement Mesa in Garfield County, Colorado. These gas wells were originally drilled by Petrohunter Operating Co. and GSL Energy Corp. and were purchased and completed by Laramie Energy II in 2008. Laramie Energy II retained Olsson Associates Inc. (Olsson) to collect natural gas and produced water samples from the Furr Wells to comply with the requirements of the Colorado Oil and Gas Conservation Commission (COGCC) Rulison Sampling and Analysis Plan (RSAP) requirement developed by URS Corporation (URS) for all natural gas wells within a three-mile radius of the former Project Rulison site.

The Laramie II natural gas wells discussed in this report are all located within a 3-mile radius of the Project Rulison underground nuclear test site conducted in September 1969 by the Atomic Energy Commission, a predecessor agency to the Department of Energy (DOE), and Austral Oil, a private oil company. Project Rulison was a subsurface natural gas stimulation nuclear test designed to produce natural gas from tight gas sands in the Cretaceous age Williams Fork Formation.

In general, the RSAP requires all companies drilling or producing natural gas wells within specified zones and sectors surrounding the former Rulison site to review certain drilling data (gamma ray logs) and to sample certain production media (natural gas and produced water) to document the presence or absence of potential impacts associated with Project Rulison.

All known natural gas wells within the three mile radius of Project Rulison (including Laramie Energy II wells) are shown on [Figure 1](#). Laramie Energy II's Furr Gas wells are shown more specifically on [Figure 2](#). This report presents the third quarter, 2009 production monitoring results for the Laramie Energy II Furr 16-22B and 16-22D well conducted on October 1, 2009. These samples were collected one day after the end of third quarter.

The drilling and baseline monitoring activities for the Furr wells were conducted in November and December 2008 with the results presented in a report titled Laramie Energy II, LLC Tier II Gas Well Baseline Monitoring and Production Report, Rulison Field, Garfield County, Colorado November - December 2008 (May 2009). The results of this drilling and baseline/quarterly monitoring indicate that no Project Rulison related radionuclides were detected in any of the gas or produced water samples. An addendum to this report (July 2009) was provided for data verification and validation performed by Diane Short and Associates.

Copies of the reports, including the December 17, 2008 baseline/production data, data validation addendum, the first quarter (April 2009) and second quarter (June 2009) data reports for the Furr 16-22B and Furr 16-22D wells, were provided to Laramie Energy II, the Colorado Oil and Gas Conservation Commission (COGCC), the Colorado Department of Public Health and Environment (CDPHE) Hazardous Materials and Waste Management Division - Radiation Management Unit, S.M. Stoller/DOE, the Garfield County Oil and Gas Liaison, and URS Corporation.

For purposes of classifying the Laramie Energy II wells within the context of the current RSAP, both the Furr 16-22D and Furr 16-22B are considered Tier II wells located respectively in Sectors 10 and 11. The Furr 16-22B is currently considered to be the closest natural gas well to the former Project Rulison site in sector 11. The Furr 16-22D has a surface location in sector 11 and a bottom hole location in sector 10, but the bottom hole location is near the sector dividing line.

As shown by the baseline sampling conducted in November and December of 2008, the first quarter laboratory analytical results collected in early April 2009, and the second quarter laboratory analytical results for samples collected in June 2009 do not indicate the presence of any Project Rulison related radioactivity. No Project Rulison related radioactivity was detected in the natural gas or produced water samples collected on October 1, 2009. A summary table of Laramie Energy II well locations and sampling activities is presents as [Table 1](#).

1.1 Tier II Zone Monitoring Requirements

URS Corporation (URS) is working for Noble Energy, EnCana Oil & Gas (USA), Inc., and Williams Production RMT who are also conducting natural gas well drilling operations in the vicinity of Project Rulison. URS has developed a Rulison Sampling Analysis Plan (RSAP), Revision 2 issued in March 2008. The URS RSAP is currently in revision, and Revision 3 should be issued in the spring of 2010, but any changes will need to be approved by the Colorado Oil and Gas Conservation Commission.

The URS RSAP defines Tier II wells as those gas wells located outside the 1-mile radius, but within the 3-mile radius of Project Rulison; whereas Tier I wells are defined as those gas wells located within the 1-mile radius of Project Rulison. This RSAP has been adopted by the COGCC, and outlines the required sampling and analysis for all operators within a three-mile radius of Project Rulison.

According to the March 2008 Revision 2 of the URS RSAP the Tier II well monitoring includes:

- Drilling Monitoring;
- Production Monitoring; and
- Baseline produced water and natural gas monitoring.

According to the URS RSAP Table 2 - Tier I and II Sampling and Analysis Scheme for Gas Wells within a Three Mile Radius of Project Rulison well production sampling provisions require that Tier II wells, such as the Furr 16-22 B and 16-22D, be sampled and analyzed as follows:

- A one-time sampling and analysis of produced water for the radiological and non-radiological analytes listed in Table 3 and Table 4 of the RSAP. The Tier II wells are to be sampled as soon as possible after frac-ing but no later than 30days after the first gas delivery from a new gas well;
- If a Tier II gas well is the closest well in a sector (i.e. no Tier I well), produced water and natural gas will be sampled and analyzed for the radiological analytes listed in Table 3 quarterly during the first year, semi-annually (twice a year) during the second and third year, and annually thereafter; and
- Further testing contingent on verified Project Rulison-related radionuclide detection in Tier I zone wells.

1.2 Laramie Energy II Furr 16-22B and Furr 16-22D Gas Wells

Both the Furr 16-22B and Furr 16-22D are directionally drilled wells meaning that the bottom of the wells are located several hundred feet to thousands of feet away from the surface location as shown on [Figure 2](#) and [Figure 3](#).

The Laramie Energy Furr 16-22B well is the closest Tier II well in Sector 11, and as such is required to be sampled quarterly during the first year. However, it was shut-in on April 14, 2009, and could not be sampled at that time. It was sampled on December 17, 2008 as part of the baseline sampling, and was sampled on June 24, 2009 and again on October 1, 2009.

The Furr 16-22D has a surface location in sector 11 and a bottom hole location in sector 10. The Furr 16-22D was sampled on April 14, 2009 in lieu of the Furr 16-22B as it is the next closest Tier II well to Project Rulison operated by Laramie Energy II. The Furr 16-22D was sampled on June 24, 2009 and again on October 1, 2009 for consistency, but may be dropped from subsequent sampling events since there are wells with bottom hole locations closer to

Project Rulison within sector 10. The Furr 16-22D has been sampled to provide continuity in the data in the event that the 16-22B well does not yield sufficient produced water to allow for a sample. Noble Energy has Tier I and Tier II wells located in sector 10 that are closer to the dividing line between sector 10 - sector 9 but that are also closer to the former Project Rulison site than any of the Furr wells as shown on [Figure 1](#).

Olsson Associates conducted the third quarter 2009 sampling event for both the Furr 16-22D and Furr 16-22B wells. This report presents the results from Furr 16-22B and Furr 16-22D gas and produced water samples collected on October 1, 2009. Copies of the Isotech Laboratories Inc. laboratory reports for the Furr 16-22B and Furr 16-22D gas samples submitted for tritium and carbon-14 (^{14}C) analysis are included as [Appendix A](#). The analytical results for the produced water samples from the Furr 16-22B and the Furr 16-22D, analyzed by GEL Laboratory LLC, are presented as [Appendix B](#). Monthly produced water volumes have declined over time in both wells. Graphs showing the monthly production from data on the COGCC internet website are included as [Appendix C](#).

1.3 Tier II Zone Drilling Monitoring Requirements

The drilling monitoring requirements in the RSAP consist of a review of the open- or cased-hole gamma-ray logs through the Williams Fork Formation interval for evidence of elevated gamma radiation. This review is conducted to determine whether there is potential evidence of Project Rulison-related gamma radiation observed in the formation during gas well drilling. The gamma-ray logs also detect naturally occurring radionuclides such as potassium-40, uranium, and thorium isotopes. According to the URS RSAP, the logs will be reviewed for evidence of above normal gamma-ray signatures. A gamma radiation measurement greater than 500 API gamma units or any other gamma readings that appear to be anomalous are to be noted by the drilling supervisor or his designated representative and immediately reported to the Company management and the [radiation safety officer] RSO for review and guidance. Mr. Richard Henry with URS Corp. has agreed to act as RSO for Laramie Energy II.

A review of the well logs for the Furr 16-22B and Furr 16-22D wells on the COGCC website database shows that gamma-ray signatures were typically less than 200 API gamma units. Special attention was paid to the well log intervals from below 6,000 feet to the bottom of each the wells. Copies of these logs were presented and discussed in the first quarter 2009 report.

1.4 Data Verification and Validation Requirements

Section 9 of the RSAP outlines the data verification and validation requirements. Olsson retained Diane Short & Associates of Lakewood, Colorado to perform the independent data validation on the November and December 2008 radiochemistry and non-radiochemistry baseline and production data, and also on the radiochemistry parameters for the 2009 quarterly production data for the Furr 16-22D and Furr 16-22B wells.

The data verification and validation was provided as an addendum (July 2009) to the Laramie Energy II, L.L.C. Tier II Gas Well Baseline Monitoring and Production Monitoring Report, Rulison Field, Garfield County, Colorado November - December 2008 (May 2009). The July 2009 addendum was also submitted to the COGCC, CDPHE-HMWMD Radiation Control, S.M. Stoller/DOE, Garfield County, and URS Corp. The data in this report and subsequent quarterly reports will also be verified and validated.

1.5 Background Radiation Studies

Tritium, a radioactive isotope of hydrogen (^3H), is produced naturally in small quantities in the upper atmosphere, and produced in much larger quantities during the detonation of a nuclear device. Tritium is a weak beta emitter and does not emit gamma rays. Since tritium can potentially be entrained within natural gas, and tritium is the most abundant and most mobile nuclide in the Rulison inventory, it is the primary radionuclide of concern. Tritium levels were evaluated in groundwater and surface water in the area before and after the Project Rulison experiment and were found to be comparable to background concentrations for that time in both sets of samples.

One tritium unit (TU) is equivalent to 3.2 picocuries per liter (pCi/L). The USGS sample results ranged from less than 220 TU (not detected) to a maximum of 618 TU reported for a well sample collected in May 1969, approximately four months before Project Rulison was conducted. Background activities for tritium were higher at the time due to nuclear weapons testing, so tritium activities in the late 1960s and early 1970s ranged from 700 pCi/L to more than 1,000 pCi/L (Voegeli and Claassen, 1971).

Today natural background tritium levels in precipitation typically range from 10 TU to 20 TU (32 pCi/L to 64 pCi/L). The CDPHE basic groundwater quality standard for tritium is 20,000 pCi/L referenced as the level of activity that could potentially result in an annual dose of 4 millirems of beta radiation.

According to the USGS Open File Report 474-68 Geohydrology - Project Rulison (Voegeli, West, Cordes, 1970), intervals below 6,000 feet below ground surface (bgs) in the R-EX hole were analyzed in 1968 for the presence of gross alpha as Uranium equivalent and gross beta as ^{90}Sr - ^{90}Y . The alpha activities ranged from < 0.4 $\mu\text{g/L}$ to 9.8 $\mu\text{g/L}$, and gross beta activities ranged from 29 pCi/L to 70 pCi/L (Voegeli, 1969).

Additionally, Olsson Associates obtained a copy of the Basic Data Report No. 7 - Radiochemical Analyses of Ground and Surface Water in Colorado, 1954-1961 (Scott and Voegeli, 1961) a study conducted by the USGS in cooperation with the Colorado Water Conservation Board. Tritium activities were not analyzed in this study; however, since it was conducted eight years before Project Rulison it does provide information on background radiation throughout the state. The geometric mean for beta-gamma activity in groundwater samples collected throughout the state was 17.34 picocuries per liter (pCi/L) while the median and mode were both 14 pCi/L. The arithmetic mean of these groundwater samples was 62.2 pCi/L.

1.6 Rulison Path Forward

In June 2009 the U.S. Department of Energy (DOE), Office of Legacy Management issued a draft report entitled "Rulison Path Forward" which was intended to serve as a guide for discussions with the Colorado State regulators and other interested stakeholders in response to increased drilling for natural gas reserves near the underground nuclear explosion site at Rulison, Colorado. The report outlines the DOE's recommendation that gas development occur in a conservative, staged drilling approach as the gas production companies move closer toward the COGCC established half-mile radius surrounding the DOE 40-acre institutional control boundary around the Rulison site. Operators wishing to drill within the COGCC half-mile radius would require a full hearing before the commission before the application for permit to drill (APD) could be approved.

Institutional controls are legally enforceable spatial boundaries that limit intrusion at a site to a safe distance to be protective of human health and the environment. The institutional controls at Rulison prohibit drilling below the 6,000 feet depth within the 40-acres known as Lot 11 (NE $\frac{1}{4}$, SW $\frac{1}{4}$ Section 25, T7S, R95W) surrounding the Project Rulison site. The depth at which the detonation occurred (8,426 feet bgs) and the low permeability of the Williams Fork Formation and overlying strata inhibit any potential migration of impacted water from the cavity. Investigations and remediation of surface contamination were conducted in the 1970s up through 1996 with the cleanup of non-radiological contamination associated with the drilling mud pits and effluent pond that were remediated in

1996, as documented in the Rulison Site Surface Report Published in July 1998. Although no feasible technology exists to remove the subsurface radioactivity contamination from in or around the cavity, the DOE has no evidence that indicates radionuclides from the Rulison site have migrated or ever will migrate beyond the 40-acre institutional control boundary.

The DOE had the Desert Research Institute conduct modeling which calculates potential transport distances from the Rulison site to a hypothetical producing well. The results of the most recent conservative modeling show that wells at the half-mile radius, even in the east-west direction of the natural fracture trend, are safe for gas production. Despite low risks, the DOE recommends a cautious approach to gas development near the Rulison site.

1.7 Radionuclides of Concern

According to the DOE Rulison Path Forward (June 2009), tritium is the only contaminant of concern, which is consistent with the 1973 AEC Project Manager's report. Most of the longer-lived radionuclides produced by the detonation were incorporated into the molten rock that cooled to form a melt glass at the bottom of the cavity. Krypton-85 and carbon-14 were two other longer-lived radionuclides that were produced by the detonation that could potentially be present in natural gas. However, gas production testing of the re-entry well in 1970 removed almost all of the krypton-85 and carbon-14 created by the detonation, leaving tritium as the only contaminant of concern. According to the DOE Rulison Path forward, *Table 1 - Radionuclides in Re-entry Well Gas* the estimated remaining krypton-85 was < 10 curies, and the remaining carbon-14 was estimated at < 1 curie; where the curie is a unit of radioactivity measurement.

Of the 10,000 curies of tritium produced by the Rulison detonation, 2,824 curies were estimated to have been removed by production testing measurements. Following correction for decay, the estimated remaining tritium activity in and around the Rulison cavity in Lot 11 is estimated to be between 700 curies and 1,036 curies by late 2009. The DOE Rulison path forward states that even if tritium were to reach a producing gas well the risk is low in that there is no reasonable exposure scenario. Water vapor is removed from the gas stream at the well pad where it condenses out and is separated as a waste byproduct. The produced water is separated from the gas stream prior to the gas entering the distribution system. The gas in the distribution system is co-mingled with gas from other wells producing throughout the area.

For perspective, the activity of tritium used in self-luminating exit signs typically ranges from 7.5 curies to 11.5 curies and the tritium activity used in gun sights and luminous dials on wrist watches ranges from about 0.005 curies to 0.012 curies. A picocurie is one-trillionth of a curie so converting 7.5 curies to the units used in production monitoring would be 7,500,000,000,000 picocuries.

Production monitoring is conducted for tritium in natural gas and produced water, but also involves analyzing gas samples for carbon-14, and produced water samples for gross alpha activities, gross beta activities, gamma spectroscopy, cesium-137, chlorine-36, strontium-90, technetium-99, and total uranium. The laboratory units for these parameters are also expressed in picocuries per liter (pCi/L), where one picocurie is a trillionth of a curie. One picocurie is equivalent to 0.037 disintegrations per second or 2.22 disintegrations per minute.

2.0 Natural Gas and Produced Water Sampling

Laramie Energy II authorized sampling of the Furr 16-22D and Furr 16-22B wells, are both Tier II wells with wellheads located in sector 10. The Furr 16-22D has a surface location in sector 10 and a bottom of hole location in sector 11. Olsson performed the sampling of the natural gas and produced water by following the URS RSAP, Revision 2, March 2008. There are no Tier I wells within Sector 10; therefore, the Furr 16-22B is the closest Tier II well in this sector.

The Furr 16-22D is the next closest Tier II well to Project Rulison operated by Laramie Energy II. Noble Energy has completed Tier II wells and Tier I wells in Sector 10 that are closer to Project Rulison than any of the Laramie Energy II wells. However, these Noble Energy wells are located near the dividing line between sectors 9 and 10.

2.1 Quarterly Production Sampling

Well Identification:

Well Surface Location:

- Furr 16-22B SE ¼, SE ¼, Section 22, T7S, R95W; and
- Furr 16-22D SE ¼, SE ¼, Section 22, T7S, R95W.

Olsson personnel sampled natural gas and produced water from the Furr 16-22B and Furr 16-22D wells on June 24, 2009 for the radiochemistry parameters listed in Table 3 of the URS RSAP. The samples consisted of natural gas collected from the Furr 16-22B and 16-22D well separators with the assistance of Laramie Energy II's pumper. Olsson Associates collected the gas sample using a two-stage regulator and obtaining the gas from the separator.

Olsson collected the produced water samples from the dump lines on the separators for the Furr 16-22B and 16-22D wells. Since there are multiple wells on these pads and production fluids are co-mingled in the onsite tank batteries, it is not possible to collect representative produced water samples for individual wells from the onsite production tanks as described in the URS RSAP sampling protocols.

2.2 Natural Gas Sample Analysis

The natural gas samples collected from the Furr 16-22B and Furr 16-22D gas wells on October 1, 2009 were submitted to Isotech in Champaign, Illinois for gas compositional analysis including carbon-14 (¹⁴C) and tritium (³H), a radioactive form of hydrogen. The natural gas samples were each collected in an evacuated

propane tank provided by Isotech, using a two-stage pressure regulator connected to the separator or the natural gas wellhead. Copies of the laboratory reports from Isotech are included in [Appendix A](#).

Isotech reported the tritium (^3H) results in tritium units (TU). One TU is equivalent to 3.19 picocuries per liter (pCi/L), and the results, which indicate that tritium was not detected, are shown less than the reporting limit of 10 TU are presented in [Table 2](#). The tritium analysis measures counts above background, and if the concentration is high enough the laboratory can report a finite value with a calculated uncertainty. If the concentration is low relative to the standard deviation of the measurement then the values are reported as “less than” the laboratory reporting limit, meaning that tritium was not detected. Isotech’s reporting limit for tritium ranges from about 10 TU to 15 TU.

Beginning in about 1954, atmospheric tritium levels rose in excess of 1,000 TU due to nuclear weapons testing, and have declined back to natural background levels since then as a result of the ban on nuclear testing. Current natural background levels for tritium in the atmosphere range from 5 TU to 50 TU (15.9 pCi/L to 159.5 pCi/L). The isotopic composition of hydrogen is compared relative to the Vienna Standard Mean Ocean Water (VSMOW) standard.

Isotopic composition of carbon is relative to the Vienna Pee Dee Belemnite (VPDB) $\delta^{13}\text{C}$ Standard and is based on the carbon isotopes in the shell of a marine fossil. The laboratory detection limit is 1 percent modern carbon (pMC). The results indicate that carbon-14 (^{14}C) is not present in the natural gas and the natural gas has been isolated from sources of modern carbon. According to the DOE Rulison End State Vision (2005) and the Rulison Path Forward (2009) the amount of ^{14}C present in the Rulison Site source term was estimated at 2.2 curies to 2.4 curies. Less than 1 curie is estimated to remain in the Rulison cavity corrected for the ^{14}C activity that was removed during production testing in the early 1970s.

2.3 Produced Water Sample Analysis

Produced water samples were collected from the dump lines on the Furr 16-22B and 16-22D separator units located on the well pad. These produced water samples were submitted for analysis of radiochemistry parameters as listed in [Table 3](#), as specified for Tier II wells in Table 2 of the URS RSAP. Produced water samples collected on October 1, 2009 were submitted to Isotech (Champaign, IL) for tritium analysis and to GEL Laboratory in Charleston, South Carolina for radiochemistry analysis (gamma spectroscopy, gas flow proportional counting for gross alpha and gross beta, chlorine-36 (^{36}Cl), strontium-90 (^{90}Sr),

liquid scintillation analysis for Technetium-99 (^{99}Tc), and total uranium. Copies of the laboratory reports from Isotech are included as [Appendix A](#), and a copy of the GEL Laboratories report is included as [Appendix B](#). The laboratory analytical results are discussed in the following section and the results are summarized in [Table 1](#) through [Table 5](#).

A produced water sample could not be collected from the Furr 16-22B during the April 2009 sampling event due to the well being shut-in at that time. During the June 24, 2009 sampling event, the Furr 16-22B was slow to yield produced water from the dump line on the separator; however, a sufficient volume of water was produced to collect a sample. According to production records available on the COGCC internet website, monthly produced water volumes have shown a steady decline for both wells. Copies of the production records for these wells and a graph showing the rates of decline are presented in [Appendix C](#).

2.4 Performance and Monitoring Criteria

During the June 2009 sampling event, a duplicate gas and produced water sample were collected from the Furr 16-22D well and a field blank for QA/QC evaluation in keeping with the RSAP protocols. The duplicate sample (Sample ID: 22-9-16) was collected to satisfy the required one duplicate sample for every 20 samples collected. The gas sample and an aliquot of the produced water sample were submitted to Isotech Laboratory for compositional analysis of the gas, including tritium and carbon-14, and tritium analysis of the produced water sample. The remaining aliquots of the produced water sample were submitted to GEL Laboratories, Inc. for radiochemistry analyses.

Water samples for QA/QC evaluation were not collected on October 1, 2009, but will be collected during future events on the same sampling frequency as presented in the RSAP Section 9 for data verification and validation. The laboratory reports were provided to Diane Short and Associates for data verification and validation. Copies of the report prepared by Diane Short and Associates for the evaluation of the data are presented as [Appendix D](#).

3.0 Laboratory Analytical Results

The following sections present the laboratory analytical results for natural gas samples and produced water samples. Radionuclide results are presented first followed by the results for inorganic and organic analyses. The laboratory analytical results for the natural gas and produced water samples show that there are no Project Rulison related radionuclides present in the natural gas or produced water collected from the Furr 16-22B and 16-22D Tier II gas wells.

3.1 Natural Gas Sample Results

The natural gas sample results are presented in [Table 2](#) and copies of the Isotech laboratory gas sample reports are presented in [Appendix A](#). The Isotech laboratory reports present the compositional analysis reported in mol percent for components in each of the gas samples. The results show that the samples are predominantly composed of methane with lesser concentrations of helium, hydrogen, oxygen, carbon dioxide, nitrogen, ethane, propane, iso-butane, N-butane, iso-pentane, and hexanes. Argon, carbon monoxide, hydrogen sulfide, and ethylene gas were not detected. The gas samples were also analyzed for the radionuclides tritium (^3H) and carbon-14 (^{14}C).

3.1.1 Tritium Results

The tritium (^3H) in the two gas samples collected from the Furr 16-22B and Furr 16-22D, were each reported as < 10 tritium units (TU) which means that tritium not detected above the laboratory method detection limits in any of the samples. One TU is equal to 3.19 pCi/L so this corresponds to a detection limit of approximately 31.9 pCi/L.

3.1.2 Carbon-14 Results

The carbon-14 results were reported for the gas samples from the Furr 16-22B and Furr16-22D, as < 0.4, and 0.4 ± 0.1 , percent modern carbon (pMC), respectively. The results were reported as less than the laboratory method detection limit (0.4 to 0.5 pMC), meaning that carbon-14 (^{14}C) activity was not detected, which indicates that the gas sample has been isolated from sources of modern carbon. The absence of ^{14}C activity also indicates that there is no Project Rulison related radioactivity in the gas samples.

3.2 Produced Water Sample - Radiochemistry Results

The following sections present the laboratory analytical results for the produced water samples collected from the Furr 16-22B and 16-22D gas wells on October 1, 2009. Copies of the laboratory reports from Isotech and GEL are included as [Appendix A](#) and [Appendix B](#), respectively.

3.2.1 Tritium Results

The Isotech laboratory results for tritium (^3H) in the produced water samples were reported as < 10.0 TU in the Furr 16-22B sample and in the Furr 16-22D sample, or approximately less than 31.9 pCi/L. The minimum detectable concentration (MDC) that Isotech is able to achieve for ^3H using the direct count method is 10.0 TU. The tritium results in produced water are summarized in [Table 3](#).

Natural background tritium levels in precipitation typically range from 10 TU to 20 TU (32 pCi/L to 64 pCi/L) and a reasonable upper bound for tritium background activities may be estimated at 100 TU or approximately 320 pCi/L. The CDPHE basic groundwater quality standard for tritium is 20,000 pCi/L referenced as the level of activity that could potentially result in an annual dose of 4 millirems of beta radiation.

3.2.2 Gross Alpha Radiation Results

The GEL Laboratories, LLC (GEL) laboratory results for gross alpha activities show that alpha radiation was detected in the produced water sample from the Furr 16-22B (26.0 ± 11.5 pCi/L), but was not detected in the produced water sample from the Furr 16-22D ("U" 6.70 ± 9.46 pCi/L). The laboratory detection limit (DL) ranged from 15.9 pCi/L to 16.3 pCi/L and the laboratory reporting limit (RL) was 5.00 pCi/L, as indicated on page 6 of the GEL laboratory report.

The detected gross alpha activity is likely due to naturally occurring radionuclides associated with high total dissolved solids (TDS) concentrations present in the samples. The alpha activity is within the expected range of natural background radiation for the area and is likely due to the presence of naturally occurring uranium, thorium, and their daughter products present in the produced water from the producing formation. One part per million (ppm) uranium (^{238}U) equals 0.33 picocuries per gram (pCi/g); and one ppm thorium (^{232}Th) equals 0.11 pCi/g.

The results for the gross alpha activities in the produced water sample are summarized on [Table 4](#) and copies of the laboratory report are presented in [Appendix B](#).

3.2.3 Gross Beta Radiation Results

The GEL laboratory results for gross beta activities in produced water samples indicated that gross beta activities were not detected in the Furr 16-22B and Furr 16-22D samples. The laboratory results were reported as 'Not Detected' symbolized with a "U" qualifier, with beta activity results of $11.1 \pm 10.9 \pm 11.6$ pCi/L and 7.27 ± 11.3 pCi/L, respectively. The laboratory detection limit (DL) ranged from 18.3 pCi/L to 19.1 pCi/L and the laboratory reporting limit (RL) was 5.00 pCi/L.

The gross beta results are within the expected range of natural background radiation for the area and are likely due to the presence of naturally occurring potassium-40 (^{40}K). GEL reported that potassium-40 (^{40}K) analyzed as part of the gamma spectroscopy analysis was reported as "UI" for uncertain identification in the Furr 16-22B produced water sample (0.00 ± 47.8 pCi/L) and was detected with a reported activity of 61.6 ± 31.7 pCi/L in the Furr 16-22D produced water sample. The laboratory detection limit (DL) was 29.6 pCi/L.

The results for the gross beta activities are summarized on [Table 3](#) and copies of the laboratory reports are presented in [Appendix B](#) for the June 24, 2009 samples.

3.2.4 Strontium-90 and Technetium-99 Results

The produced water samples submitted to GEL Laboratories were analyzed for Strontium-90 (^{90}Sr) and Technetium-99 (^{99}Tc). The laboratory results show that Strontium-90 (^{90}Sr) and Technetium-99 (^{99}Tc) were not detected in either of the produced water samples. The results for the ^{90}Sr and ^{99}Tc activities are summarized on [Table 3](#) and copies of the laboratory reports are presented in [Appendix B](#).

3.2.5 Chlorine-36 results

The produced water samples were submitted to GEL for analysis of chlorine-36 (^{36}Cl). The results show that ^{36}Cl activities were not detected above the laboratory reporting limits in either of the produced water samples. The results for the ^{36}Cl activities are summarized on [Table 3](#) and copies of the laboratory reports are presented in [Appendix B](#).

According to the January 2005 DOE Rulison Site End State Vision document, the estimated inventory of ^{36}Cl produced by the Rulison detonation was 2.82 curies (Ci), and according to the URS 3rd Quarter 2008 Report, ^{36}Cl is a less common radionuclide in the inventory at Project Rulison.

3.2.6 Gamma-Emitting Radionuclide Results

The majority of the results for the gamma-emitting radionuclides show that gamma activities were not detected above laboratory reporting limits. This is indicated with a letter 'U' in the results of the laboratory report and also in the first row of [Table 4](#).

The GEL gamma spectroscopy results for the Furr 16-22B produced water sample show that Bismuth-214 was detected at 19.5 ± 8.70 pCi/L with a detection limit of 6.38 pCi/L; and the results for the Furr 16-22D produced water sample show that Bismuth-214 was detected at 12.7 ± 8.27 pCi/L with a detection limit of 6.09 pCi/L. Bismuth-214 is a daughter product of the naturally occurring Uranium-238 and Thorium-232 decay series.

The GEL laboratory results for gamma-emitting radionuclides in the Furr 16-22B produced water sample show that Actinium-228, Lead-214, Potassium-40, and Radium-228 were qualified as "UI" Gamma Spectroscopy - 'Uncertain Identification.' The GEL laboratory results for gamma-emitting radionuclides in the Furr 16-22D sample show that Lead-212, Lead-214, and Thorium-230 results were qualified as "UI." Bismuth-214 was detected in both the Furr 16-22B and 16-22D samples with activities of 19.5 ± 8.70 pCi/L and 12.7 ± 8.27 pCi/L, respectively. These are naturally occurring radionuclides that are daughter products of Uranium-238 (^{238}U) and Thorium-232 (^{232}Th) decay series. Copies of the laboratory reports for gamma spectroscopy results are included in [Appendix B](#).

Gamma spectroscopy results for potassium-40 activity was reported as "UI" uncertain identification in the Furr 16-22B produced water sample and reportedly detected in the Furr 16-22D sample at 61.6 ± 31.7 with a detection limit of 29.6 pCi/L. Potassium-40 (^{40}K) was previously detected in seven of the fourteen produced water samples submitted in November and December 2008 including the sample from the Furr 16-22D. Potassium-40 is one of the most common radionuclides in nature and is frequently found in sedimentary rocks high in clay minerals since these minerals contain potassium in their chemical formulas.

Krypton-85 (^{85}Kr) is included as a radionuclide in the GEL gamma spectroscopy report, and was not detected in either of the two produced water samples. Krypton-85 has not been detected as a gamma spectroscopy constituent in the samples previously submitted from the Laramie Energy II wells.

In addition to Tritium (^3H) and Carbon-14 (^{14}C), Krypton-85 (^{85}Kr), an inert gas, is considered as a gas phase radionuclide that potentially could be entrained in the natural gas. However, the initial activity of ^{85}Kr was estimated at 1,100 curies

and the majority of ^{85}Kr was removed during the Project Rulison production tests. The amount of ^{85}Kr recovered was used to calculate the yield of the Project Rulison device and to estimate the size of the chimney and the cavity. According to the Rulison Path Forward document it is estimated that < 10 curies of ^{85}Kr may remain in the subsurface by late 2009. Krypton-85 is a weak beta particle emitting radionuclide and has a 10.76 year half-life.

GEL Laboratories does not perform Krypton isotopic analysis or Krypton-85 beta activity analysis. Analyzing for ^{85}Kr beta activity is problematic due to the large sample volumes required, long counting time, and because only a limited number of laboratories worldwide have the specialized equipment to perform the analysis.

3.3 Data Verification and Validation

The following presents the results of the data verification and validation analysis of the Isotech and GEL laboratory reports.

3.3.1 Isotech Results

Samples of natural gas and produced water were collected from the Furr 16-22B and Furr 16-22D on October 1, 2009. Isotech Laboratories received two produced water samples and two gas LP tanks on October 2, 2009. The produced water samples were submitted for tritium analysis by the direct count method and the gas samples were submitted for compositional analysis including carbon-14 and tritium.

Olsson requested that Isotech perform the analysis consistent with what they are doing for URS per the RSAP. No QA/QC data was provided by Isotech; however, the ^3H in all of the gas and produced water samples were reported as less than the laboratory reporting limit (< 10 TU). According to Isotech the chemical analysis was based on standards accurate to within 2%. A duplicate error ratio (DER) cannot be calculated for the tritium in produced water since a field duplicate sample was not collected and the results were reported as less than the laboratory reporting limit.

Diane Short and Associates was retained to verify and validate the data. The tritium results were provided to Diane Short and Associates; however since Isotech only provided sample results without quality control information it was not possible for Diane Short and Associates to validate the Isotech data.

3.3.2 GEL Results for GFPC, LSC, and Total Uranium

Diane Short and Associates reviewed and validated the GEL laboratory data and prepared two separate reports. One report was for the gas flow proportional

counting (GFPC) for gross alpha/beta, Cl-36 and Sr-90, liquid scintillation (LSC) for Tc-99, and total uranium in water. The second report was for validation of the gamma spectroscopy results.

According to Diane Short and Associates, the data are considered fully useable for project purposes with consideration of the following. Aliquots of the two produced water samples were received by GEL Laboratories on October 2, 2009 for analysis of gross alpha, gross beta, ⁹⁰Sr, ⁹⁹Tc, ³⁶Cl, and total uranium.

According to the laboratory receipt and review form, the samples were received intact and stored on ice. Chain of custody documents were included, sample containers were intact and sealed, and the samples were received within holding time. The sample identifications, date and time, and the number of containers indicated on the chain of custody matched with the sample containers, and the chain of custody was signed in relinquished /received sections. The laboratory commented that both the samples were biphasic with a thick layer of oil at the top. The laboratory decanted off the oil layer and discarded it, and only analyzed the aqueous portion of the sample.

According to Diane Short and Associates, GEL provided a QC summary as part of the analytical data package, but did not include raw data. Diane Short and Associates conducted a Level II review of the GEL data. Non-conformance reports were generated to document any procedural anomalies that may deviate from referenced standard operating procedures or contractual documents. The non-conformance report was generated due to the sample being improperly preserved upon receipt. This was due to buffering by the sample matrix, and although the sample containers contained acid prior to sample collection, it was neutralized by the produced water. The laboratory added acid upon receipt per Olsson instruction. The laboratory added preservative to bring the sample pH into the acceptance range, as permitted by 40 CFR, and according to Diane Short and Associates, this should have no impact on the results. No qualifiers are applied.

Additionally, the laboratory noted that the samples were received at 11 °C and 12 °C. Chilling samples to less than 6 °C is not required for radiological testing by 40 CFR. No qualifiers are applied.

Gross alpha and gross beta results were reported for both the Furr 16-22D and 22-9-16 sample. The observed minimum detectable concentration (MDC), or detection limit (DL) is higher than the normal MDC or reporting limit (RL). Diane Short and Associates compared these results to previous results which have

included comments that this occurs due to a non-homogeneous matrix (oily liquid). No qualification is required.

Gas flow proportional counting (GFPC) results for surrogate/tracer recoveries of potassium chloride carrier (chlorine-36), strontium carrier, and technetium-99m tracer recovery percentages were reportedly within the acceptable limits for the laboratory. GEL provided a non-conformance report for the Cl-36 data stating that the RDL is less than the minimum detectable activity (MDA) due to reduced aliquots. No qualification is applied.

GEL indicated that the matrix spike (MS)/matrix spike duplicate (MSD) did not meet recovery requirements due to the matrix being non-homogeneous and a miscellaneous liquid. The MS recovery for alpha was 45.4%, 38.4% for the MSD. The MS recovery for gross beta was 33.4%, and 40.3% for the MSD. The matrix spikes conducted for Cl-36, Tc-99, and total Uranium were in control. The matrix duplicates for these analyses were in control.

Matrix duplicates were analyzed using the same samples as were used for the matrix spikes. The matrix duplicate for alpha is in control. The relative percent difference (RPD) for the gross beta is 55 percent and the derived error ratio (DER) is 2.53. The sample and the matrix duplicate have levels that are less than five times the RL, and the absolute difference of the results is less than two times the RL. Therefore the parent sample is qualified 'JD' to indicate that the precision of this analysis may be out of normal limits on this sample for the gross alpha/gross beta.

Preparation blanks for the LSC methods are supposed to be less than the calibration MDC or the sample MDC, whichever is reported. If all sample results in a batch are reported as 'detected,' then the preparation blank must be less than the activity of the lowest MDC in the batch. All of the Tc-99 results were reported as 'non-detect.'

For the GFPC methods, if a sample activity is less than five times the MDC, the activity of the preparation blank shall be equivalent to zero when the measurement uncertainty is considered or shall be less than the MDC. If the sample activity is greater than 5 times the MDC, the activity of the preparation blank shall be equivalent to zero where the measurement uncertainty is considered. This is determined from the normalized absolute difference (NAD).

The impact of contamination may be evaluated where appropriate by calculating the NAD for the method blank and subsequent evaluation criteria as defined in the Army Corps of Engineers guidance section III and elsewhere. When the NAD is found to be greater than 1.96 but less than 2.58, the results are qualified

'JMB#' where the '#' represents the isotopes blank activity. Such results are considered to be estimated and possibly undetected values due to the presence of blank contamination.

The GEL report provides results for the gross alpha/gross beta method blank but does not provide an MDC. The MDC levels are provided for samples, and no sample result is greater than five times the MDC. The method blank is reported as a 'non-detect.' Therefore, no qualifications are required for method blank levels. The sample results for Sr-90, Cl-36, and Tc-99 were all reported as 'non-detects' and the method blanks were also reported as 'non-detects' so no qualifications are required. Total uranium was not detected in the method blanks, but was detected in the produced water samples. No qualifiers are required.

3.3.3 GEL Results for Gamma Spectroscopy

The overall assessment of the gamma spectroscopy data reviewed by Diane Short and Associates was that the data were considered fully useable for project purposes with consideration of the following qualification or comments. The laboratory noted that sample 16-22D was received at a pH of 3. The sample containers provided by GEL were pre-acidified. However, the dissolved salts in the produced water samples have a buffering capacity which results in the pH being above 2 by the time the sample was received by the laboratory. The laboratory added acid to preserve the sample and bring the sample pH into the acceptance range. This is permissible per 40 CFR and should have no impact on the results. No qualifiers are added.

According to the GEL Sample Receipt and Review Form, the samples were received at < 6 °C and were stored with three bags of ice. Chilling to less than 6 °C is not required for radiological testing by 40 CFR. No qualifiers are added. The laboratory noted that both of the samples contained a thick layer of a light non-aqueous liquid (LNAPL). These are produced water samples collected from the dump lines of the individual well separators and as such contain a separate phase layer of natural gas condensate floating on top of the water. Olsson gave permission for the laboratory to decant the oil phase and analyze only the aqueous phase. The RSAP only requires that the aqueous phase be analyzed.

The laboratory flagged a number of results with 'UI' to indicate that they had some type of detection issue. The issues cited by the laboratory are summarized in the table of the gamma spectroscopy report provided by Diane Short and Associates. These results could potentially suffer from negative bias and are qualified as 'JQ.'

4.0 Summary

The results of the third quarter 2009 sampling of Laramie Energy II's two closest Tier II wells indicate that no radiation related to Project Rulison was detected. The surface locations for the Furr 16-22B and Furr 16-22D gas wells are both located in Section 22, Township 7S, Range 95 West of the Sixth Principal Meridian, but were directionally drilled. The Furr 16-22B and Furr 16-22D are Tier II wells in RSAP Sectors 10 and 11 and are located within the 3-mile radius of Project Rulison as shown on [Figure 1](#) and [Figure 2](#).

Isotech Laboratories indicated that the LP tanks containing the gas samples and the produced water samples submitted for tritium analysis arrived in good condition. GEL laboratories indicated that both of the produced water samples, were bi-phasic, meaning that there was a thick layer of oil floating on top of the water samples. Olsson gave the laboratory permission to remove the oil and analyze only the aqueous portion of the samples as the RSAP requires for Tier II wells.

The analytical results show that tritium (^3H), reportedly the only radionuclide of concern in the Project Rulison estimated inventory, was not detected in either gas samples or in produced water samples analyzed by Isotech in Champaign, Illinois. Tritium has a 12.3 year half-life and a significant amount of the tritium estimated to have been produced by the detonation was released in 1970 during the production testing of the re-entry well. The DOE estimated amount of Project Rulison related tritium remaining in late 2009 is 700 curies.

Carbon-14 (^{14}C) was also identified in the Project Rulison estimated inventory as a radionuclide that potentially could be present in natural gas. The Isotech analytical results for the natural gas samples collected from the Furr 16-22B and Furr 16-22D wells show that ^{14}C was not detected (< 0.5 pMC). The laboratory results show the samples have been isolated from modern carbon sources.

Gross alpha activities were reported in one of the two produced water samples. Gross alpha activities in the produced water are likely to be due to high TDS that were reported in the baseline samples collected in December 2008.

Potassium-40 (^{40}K), one of the most abundant naturally occurring radionuclides, was reportedly detected in the Furr 16-22D produced water sample and was indicated as 'UI', Uncertain identification, in the Furr 16-22B produced water sample. Potassium-40 is a beta emitting radionuclide. Gross beta activities are likely to be related to naturally occurring ^{40}K . The laboratory analytical results indicate that ^{36}Cl , ^{90}Sr , ^{99}Tc , and total Uranium results were reported as "U" meaning that they were 'not detected' in the produced water samples.

The results of the gamma spectroscopy analysis show that gamma emitting radionuclides were generally not detected. Bismuth-214 was detected in both produced water samples at relatively low activities, and is related to naturally occurring Uranium-238 and Thorium-232 decay series. Other naturally occurring radionuclides, such as Actinium-228, Lead-212, Lead-214, Thorium-230, and Radium-228 were reported as uncertain identification in the Furr 16-22D produced water sample. These radionuclides are daughter products of natural Uranium-238 and Thorium-232 decay. Other gamma emitting radionuclides were reportedly not detected, as shown with a 'U' qualifier preceding the result in the laboratory report.

Laboratory analytical results for gross alpha and gross beta indicate that alpha activities and beta activities were within the range of natural background and these low level activities are most likely due to naturally occurring radionuclides in the Uranium-238 and Thorium-232 decay chain, such as Bismuth-214 (^{214}Bi), Lead-214 (^{214}Pb), and Potassium-40 (^{40}K).

The laboratory analytical results show that gas flow proportional counting of Chlorine-36 and Strontium-90 indicate that these radionuclides were not detected in any of the produced water samples. Laboratory results for liquid scintillation counting of Technetium-99 indicate that ^{99}Tc was not detected in the two produced water samples. Total Uranium was not detected in either of the produced water samples.

Results of the data verification and validation indicate that the data is usable for the purposes of this project with consideration of the qualifications mentioned in the laboratory report, and those of the independent data reviewer. The laboratory data was reviewed by Diane Short and Associates. The data validation report is included as [Appendix D](#).

5.0 References

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TABLES AND FIGURES

TABLE 1

FURR GAS WELL INFORMATION

Furr 16-22B and Furr 16-22D Tier II Wells - Third Quarter 2009
Laramie Energy II
Rulison Area Gas Well Monitoring

COUNT	WELL	PAD	Surface Location				TOTAL DEPTH (FT.)	COMPLETION INITIATION DATE	4th Quarter 2008	1st Quarter 2009	2nd Quarter 2009	3rd Quarter 2009
			QTR/QTR	SEC	TWP	RNG						
1	Furr A11-15B	Furr A-11	NE SW	15	7S	95W	7,643	9/22/08	B (11/13/08)	N/A	N/A	N/A
2	Furr A11-15D	Furr A-11	NE SW	15	7S	95W	7,645	9/29/08	B (11/13/08)	N/A	N/A	N/A
3	Furr Hagen 6-22B	F-1	SW NE	22	7S	95W	8,225	10/3/08	B (12/17/08)	N/A	N/A	N/A
4	Furr Hagen 6-22D	F-1	SW NE	22	7S	95W	8,225	10/3/08	B (12/17/08)	N/A	N/A	N/A
5	Furr 7-22B	F-1	SW NE	22	7S	95W	8,077	10/8/08	B (12/17/08)	N/A	N/A	N/A
6	Furr 7-22D	F-1	SW NE	22	7S	95W	8,110	10/8/08	B (12/17/08)	N/A	N/A	N/A
7	Furr 10-22B	F-1	SW NE	22	7S	95W	8,130	10/13/08	B (12/17/08)	N/A	N/A	N/A
8	Furr 9-22B	F-2	SE SE	22	7S	95W	8,820	10/24/08	B (12/17/08)	N/A	N/A	N/A
9	Furr 9-22D	F-2	SE SE	22	7S	95W	8,720	10/30/08	B (12/17/08)	N/A	N/A	N/A
10	Furr 16-22B	F-2	SE SE	22	7S	95W	8,520	10/24/08	B (12/17/08)	QP (NS)	QP (6/24/09)	QP (10/01/09)
11	Furr 16-22D	F-2	SE SE	22	7S	95W	8,540	10/30/08	B (12/17/08)	QP (4/14/09)	QP (6/24/09) D	QP (10/01/09)
12	Furr 10-22D	F-3	SW SE	22	7S	95W	8,606	11/6/08	B (12/17/08)	N/A	N/A	N/A
13	Furr 15-22B	F-3	SW SE	22	7S	95W	9,172	11/6/08	B (12/17/08)	N/A	N/A	N/A
14	Furr 15-22D	F-3	SW SE	22	7S	95W	8,476	11/6/08	B (12/17/08)	N/A	N/A	N/A

Note: Shaded rows indicate the wells sampled in this report on October 1, 2009.

B - Baseline Data Collection Date (Date)

QP - Quarterly Production Data Collection Date

D - Duplicate Sample Collected

N/A - Not Applicable (See explanation below)

NS - Not Sampled (The Furr 16-22B was shut-in during the 04/14/09 sampling event and could not be sampled.)

According to the URS Rulison SAP, Revision 2, March 2008, Table 2 - *Tier I and Tier II Sampling and Analysis Scheme for Gas Wells within a Three-Mile Radius of Project Rulison*, Tier II Zone wells require a One-Time sampling and analysis (Baseline) for the radiological and non-radiological analytes in SAP Tables 3 and 4 and natural gas for the radiological analytes listed in SAP Table 3 as soon as possible after fracing but no later than 30 days after first gas delivery from a new gas well. If a Tier II well is the closest well in a sector (i.e., no Tier I well), produced water and natural gas will be sampled and analyzed for the radiological analytes listed in Table 3 quarterly during Year 1, semiannually during Years 2 and 3, and annually thereafter.

The Furr 16-22B and Furr 16-22D are the two Tier II wells closest to Project Rulison in Sector 11, and there are no Tier I wells in this sector.

A duplicate sample (D) was collected from the Furr 16-22D and was identified as '22-9-16' during the 06/24/09 sampling event.

A field blank sample was also collected during the 06/24/09 sampling event.

TABLE 2

GAS SAMPLE DATA
 Rulison Area Well Monitoring
 Furr 16-22B and Furr 16-22D Wells
 Natural Gas Samples - Laramie Energy II - Rulison Field, Garfield County, Colorado

Well Name/ No.	Sample Source	Latitude/	Longitude	Qtr/Qtr	Section	Township	Range	P.M.	Isotech Lab No.	Sample Name	Date Sample	CO %	H ₂ S %	He %	H ₂ %	Ar %	O ₂ %	CO ₂ %	N ₂ %	C ₁ %	C ₂ %	C ₂ H ₄ %	C ₃ %	iC ₄ %	nC ₄ %	iC ₅ %	nC ₅ %	C ₆ + %	¹⁴ C ₁ pMC	Std. Dev. (±)	Tritium TU	Std. Dev. (±)	Total BTU calc	Specific Gravity calc						
Furr 16-22B	Separator	39.41662	-107.97507	SE SE	22	7S	95W	6th	152400	Furr 16-22B	12/17/2008	ND	ND	0.0029	0.0036	ND	ND	2.97	0.029	89.26	5.12	ND	1.50	0.335	0.322	0.139	0.0981	0.220	< 0.4	N/A	< 10.0	N/A	1076	0.642						
									N/A		4/14/2009	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
									165099		6/24/2009	ND	ND	0.0033	0.0029	ND	0.0324	3.00	0.17	89.76	4.86	ND	1.35	0.278	0.248	0.0969	0.0640	0.133	< 0.5	N/A	< 10.0	N/A	1061	0.634						
									172338		10/1/2009	ND	ND	0.0030	0.0026	NA	0.006*	3.58	0.056	88.86	5.04	ND	1.47	0.340	0.292	0.0830	0.0574	0.211	< 0.4	N/A	< 10.0	NA	1065	0.644						
Furr 16-22D	Separator	39.41662	-107.97512	SE SE	22	7S	95W	6th	152398	Furr 16-22D	12/17/2008	ND	ND	0.0029	0.0033	ND	0.0060	3.25	0.053	88.76	5.35	ND	1.52	0.337	0.307	0.128	0.0895	0.192	< 0.8	N/A	< 10.0	N/A	1073	0.644						
									160503		4/14/2009	ND	ND	0.0029	0.0042	ND	0.0098	3.39	0.086	88.87	5.24	ND	1.45	0.309	0.278	0.117	0.0789	0.167	0.5	0.1	< 10.0	N/A	1066	0.643						
									165100		6/24/2009	ND	ND	0.0038	0.0040	ND	0.0272	2.88	0.16	89.50	5.15	ND	1.43	0.296	0.261	0.0094	0.0656	0.121	< 0.4	N/A	< 11.7	N/A	1066	0.636						
									172337		10/1/2009	ND	ND	0.0028	0.0033	NA	0.008*	3.69	0.050	88.42	5.35	ND	1.50	0.314	0.270	0.105	0.0716	0.218	0.4	0.1	< 10.0	N/A	1067	0.647						
22-9-16	Separator	39.41662	-107.97512	SE SE	22	7S	95W	6th	165101	22-9-16 (Duplicate)	6/24/2009	ND	ND	0.0033	0.0040	ND	0.0144	3.36	0.10	89.07	5.17	ND	1.42	0.297	0.263	0.101	0.0666	0.133	< 0.5	N/A	< 12.8	N/A	1063	0.640						

Note: Shaded rows present the analytical data for the samples collected on October 1, 2009 which are discussed in this report. The table presents the data as compared to the results for samples collected previously from these wells.

Accronyms:

- pMC - Percent Modern Carbon.
- TU - Tritium Units (One TU is equivalent to 3.19 pCi/L of water)
- < - Not Detected (ND) (Above Laboratory Method Detection Limit)
- Std. Dev. (±) - Standard Deviation
- BTU - British Thermal Units (cu. Ft. dry calculated at 60°F and 14.7 psia)
- calc - calculated value
- N/A - not applicable
- NA - not analyzed
- ND - not detected (Mol %)
- NS - not sampled (Furr 16-22B shut in on 04/14/09)

Gas Component:

- CO - Carbon Monoxide
- H₂S - Hydrogen Sulfide
- He - Helium
- H₂ - Hydrogen
- Ar - Argon
- O₂ - Oxygen
- CO₂ - Carbon Dioxide
- N₂ - Nitrogen
- C₁ - Methane
- C₂ - Ethane
- C₂H₄ - Ethylene
- C₃ - Propane
- iC₄ - Iso-Butane
- nC₄ - N-Butane
- iC₅ - Iso-Pentane
- nC₅ - n-Pentane
- C₆+ - Hexanes+

¹⁴C₁ - Carbon 14

Carbon-14 (14C) Detection Limit is 1.0 pMC. Isotopic composition of carbon is relative to the Vienna Peedee Belemnite (VPDB).

Tritium

Tritium (³H) Detection Limit 10.0 TU. Isotopic composition of hydrogen is relative to Vienna Standard Mean Ocean Water (VSMOW)

Std. Dev./ (±)

Standard Deviation (±) Uncertainty

Chemical compositions are normalized to 100%. Mol. % is approximately equal to vol.% Chemical analysis based on standards accurate to within 2%.

Table presents Second Quarter 2009 (06/24/09) laboratory analytical results for the Furr 16-22B and the Furr 16-22D wells. First quarter results for the Furr 16-22D (04/14/09) and also the baseline results obtained for the Furr 16-22B and Furr 16-22D (12/17/08).

* Isotech did not analyze Argon separately, but reported combined results for Oxygen and Argon for the analysis of the 10/01/09 samples.

TABLE 3

**TRITIUM ANALYTICAL RESULTS FOR PRODUCED WATER SAMPLES
Furr 16-22B and Furr 16-22D Tier II Wells
Laramie Energy II, Rulison Field, Garfield County, Colorado**

Well Name/Number	Sample Source	Latitude	Longitude	QTR/ QTR	Section	Township	Range	P.M.	SAMPLE ID	LAB Number	DATE SAMPLED	TIME SAMPLED	Laboratory	Tritium (TU)	Tritium (pCi/L) calculated
Furr 16-22B	Separator	39.41669	-107.97507	SE SE	22	7S	95W	6th	Furr 16-22B	172338	12/17/2008	12:54	ISO	< 10.8	< 34.5
											4/14/2009	NS	ISO	NS	NS
											6/24/2009	11:55	ISO	< 13.7	< 43.7
											10/1/2009	11:30	ISO	< 10.0	< 31.9
Furr 16-22D	Separator	39.41662	-107.97512	SE SE	22	7S	95W	6th	Furr 16-22D	172337	12/17/2008	12:13	ISO	< 10.0	< 31.9
											4/14/2009	11:00	ISO	< 10.0	< 31.9
											6/24/2009	11:40	ISO	< 12.0	< 38.3
											10/1/2009	11:40	ISO	< 10.0	< 31.9
22-9-16 (Furr 16-22D Duplicate)	Separator	39.41662	-107.97512	SE SE	22	7S	95W	6th	22-9-16		6/24/2009	12:50	ISO	< 10.5	< 33.5
Field Blank	NA	NA	NA	SE SE	22	7S	96W	6th	Blank		6/24/2009	12:05	ISO	54 ± 3.8	173.22 ± 12.1

Note: Shaded rows present the results for samples collected on October 1, 2009 as presented in this report. The table also presents the results from previous sampling events for these gas wells.

Tritium (³H) Detection Limit 10.0 TU. Isotopic composition of hydrogen is relative to Vienna Standard Mean Ocean Water (VSMOW).

Abbreviations:

ISO - Isotech Laboratories, Inc. of Champaign, Illinois

TU - Tritium Units (One TU is equivalent to 3.19 pCi/L of water) Note: Isotech reported the tritium results in TU and Olsson Associates converted to equivalent picocuries per liter.

pCi/L - picocuries per liter

< - Result is less than the method detection limit

NS - Not Sampled (Furr 16-22B was shut-in and the separator did not yield sufficient water volume to enable sample collection in April 14, 2009.)

Isotech Job Number 12055

TABLE 4

Radiochemistry Gas Flow Proportional Counting/Liquid Scintillation Analysis/Total Uranium for Produced Water Samples
 Furr 16-22B and Furr 16-22D Tier II Wells
 Laramie Energy II - Rulison Field, Garfield County, Colorado

WELL NAME/ Sample ID	Sample Source	Latitude/ Longitude	QTR/ QTR	Section	Township	Range	P.M.	SAMPLE ID	DATE SAMPLED	TIME SAMPLED	Laboratory	GFPC Gross Alpha	Result ± Uncertainty (pCi/L)	Detection Limit (pCi/L)	GFPC Gross Beta	Result ± Uncertainty (pCi/L)	Detection Limit (pCi/L)	GFPC Chlorine-36	Result ± Uncertainty (pCi/L)	Detection Limit (pCi/L)	GFPC Strontium-90	Result ± Uncertainty (pCi/L)	Detection Limit (pCi/L)	LSA Technetium-99	Result (pCi/L)	Detection Limit (pCi/L)	Total Uranium	Result ± Uncertainty (µg/L)	Detection Limit (µg/L)						
Furr 16-22B	Separator	39.41669 -107.9751	SE SE	22	7S	95W	6th	16-22B	12/17/2008	12:54	GEL	U	5.88 ± 16.8	30.4	U	15.9 ± 27.6	46.8	U	-98.4 ± 152	271	U	0.817 ± 0.781	1.27	U	8.00 ± 17.5	29.7	U	0.548 ± 0.116	0.267						
									4/14/2009	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
									6/24/2009	11:55	GEL	U	21.8 ± 13.3	20.2	U	31.9 ± 11.6	18.1	U	125 ± 136	229	U	-0.98 ± 0.861	1.93	U	-8.79 ± 13.0	22.8	U	-0.0389 ± 0.0302	0.0766	U	-0.0389 ± 0.0302	0.0766			
									10/1/2009	11:30	GEL	U	26.0 ± 11.5	15.9	U	11.1 ± 10.9	18.3	U	37.1 ± 135	234	U	0.103 ± 0.785	1.44	U	4.47 ± 27.2	46.8	U	0.0175 ± 0.0161	0.928						
Furr 16-22D	Separator	39.41662 -107.9751	SE SE	22	7S	95W	6th	16-22D	12/17/2008	12:13	GEL	U	-40 ± 27.6	56.2	U	0.428 ± 30.6	52.5	U	195 ± 210	353	U	-0.727 ± 0.945	1.92	U	9.98 ± 17.6	29.8	U	0.394 ± 0.0727	0.267						
									4/14/2009	11:00	GEL	U	33.0 ± 16.3	21.8	U	79.4 ± 23.0	34.8	U	47.7 ± 72.7	124	U	-0.567 ± 0.476	1.17	U	-7.01 ± 22.5	39.5	U	0.00 ± 0.00	0.289						
									6/24/2009	11:40	GEL	U	27.1 ± 12.4	17.4	U	61.7 ± 16.3	25.2	U	70.4 ± 117	201	U	-0.586 ± 0.826	1.61	U	-9.54 ± 16.1	28.0	U	0.00 ± 0.00	0.0766						
									10/1/2009	11:40	GEL	U	6.70 ± 9.46	16.3	U	7.27 ± 11.3	19.1	U	159 ± 107	173	U	0.826 ± 1.13	1.92	U	3.17 ± 27.3	47.0	U	0.00 ± 0.00	0.928						
22-9-16 (Furr 16-22D Duplicate)	Separator	39.41666 -107.975	SE SE	22	7S	95W	6th	22-9-16	6/24/2009	12:50	GEL	U	20.8 ± 11.4	17.1	U	35.5 ± 10.9	16.5	U	168 ± 126	207	U	-0.318 ± 0.594	1.32	U	3.11 ± 24.0	41.0	U	0.00 ± 0.00	0.0766						
Field Blank	N/A	N/A	N/A						6/24/2009	12:05	GEL	U	-1.14 ± 1.63	4.26	U	-1.12 ± 2.54	4.97	U	258 ± 158	256	U	-0.498 ± 0.784	1.54	U	-10.4 ± 12.6	22.1	U	0.00 ± 0.00	0.0766						

April 2009 GEL Reporting Limits: 5.00 5.00 100 2.00 50.0 1.00
 June 2009 GEL Reporting Limits: 5.00 5.00 100 2.00 50.0 1.00
 October 2009 GEL Reporting Limits: 5.00 5.00 100 2.00 50.0 1.00

Table presents 3rd Quarter 2009 (10/01/09) laboratory analytical results (shaded) for the Furr 16-22B and 16-22D wells. Previous sample results are also presented for each well, and also for a Furr 16-22D duplicate sample and field blank sample collected during the 6/24/09 sampling event. The Furr 16-22B well was shut-in and was not sampled during the April 14, 2009 sampling event.

Abbreviations:

pCi/L - picocuries per liter (activity in parts per trillion)
 µg/L - micrograms per liter (concentration in parts per billion)

U - Result is less than the sample specific Minimum Detectable Concentration (MDC) or Minimum Detectable Activity (MDA), Method Detection Limit (MDL), Limits of Detection (LOD), total propagated uncertainty (TPU), or laboratory reporting limit (RL).

NS - Not Sampled (Furr 16-22B well was shut-in during the 4/14/09 sampling event and was not sampled)

NA - Not Analyzed

N/A - Not Applicable

GFPC - Gas Flow Proportional Counting

LSA - Liquid Scintillation Analysis

TABLE 5

**GAMMA SPECTROSCOPY RESULTS FOR PRODUCED WATER SAMPLES
Furr 16-22B and Furr 16-22D Tier II Wells
Laramie Energy II - Rulison Field, Garfield County, Colorado**

WELL NAME/No.	Sample Collection Point	Latitude/ Longitude	QTR/QTR	SEC	TWP	RNG	P.M.	SAMPLE ID	DATE SAMPLED	TIME SAMPLED	Gamma Emitting Radionuclides	Ac-228 Result (pCi/L)	Am-241 Result (pCi/L)	Sb-124 Result (pCi/L)	Sb-125 Result (pCi/L)	Ba-133 Result (pCi/L)	Ba-140 Result (pCi/L)	Be-7 Result (pCi/L)	Bi-212 Result (pCi/L)	Bi-214 Result (pCi/L)	Ce-139 Result (pCi/L)	Ce-141 Result (pCi/L)	Ce-144 Result (pCi/L)	Cs-134 Result (pCi/L)	Cs-136 Result (pCi/L)	Cs-137 Result (pCi/L)	Cr-51 Result (pCi/L)	Co-56 Result (pCi/L)	Co-57 Result (pCi/L)	Co-58 Result (pCi/L)	Co-60 Result (pCi/L)	Eu-152 Result (pCi/L)	Eu-154 Result (pCi/L)	Eu-155 Result (pCi/L)	Ir-192 Result (pCi/L)	Fe-59 Result (pCi/L)	Kr-85 Result (pCi/L)				
Furr 16-22B	Separator	39.4167 -107.9751	SE SE	22	7S	95W	6th	16-22B	12/17/2008	12:54	Qualifier	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	
											Result	3.91	0.459	1.22	-1.04	-0.923	16.6	-4.13	-3.67	4.67	0.590	-0.838	-6.11	1.19	11.4	0.177	6.72	-0.858	0.0899	-3.17	0.181	-5.17	-0.406	-7.3	-0.128	-2.27	-1760				
											Uncertainty (±)	15.7	11.6	4.83	5.60	3.29	25.1	20.1	15.9	5.23	2.03	4.96	14.1	2.41	9.13	2.18	31.3	2.24	1.78	2.47	2.39	5.88	5.55	7.85	2.49	4.80	638				
											MDC	15.6	17.3	8.58	9.02	4.63	44.1	34.0	25.9	8.60	3.55	8.54	22.2	4.20	17.6	3.41	52.8	3.52	2.90	3.47	3.54	9.11	9.20	11.3	4.13	7.62	928				
Furr 16-22D	Separator	39.4166 -107.9751	SE SE	22	7S	95W	6th	16-22D	12/17/2008	12:13	Qualifier	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
											Result	6.57	10.3	0.498	-6.79	-5.81	-30.8	-26	-3.97	6.13	-1.31	-1.39	-2.9	2.66	-2.31	-1.74	-19.8	1.70	0.0278	1.50	1.43	0.715	-6.94	0.437	-1.18	-4.79	-2410				
											Uncertainty (±)	10.1	22.4	5.76	5.66	2.79	26.3	24.1	20.4	6.34	2.20	6.31	16.2	2.31	11.2	1.90	32.4	2.33	1.92	2.25	1.97	5.84	6.17	8.57	2.44	7.67	690				
											MDC	16.6	37.9	9.76	8.29	3.75	36.6	35.6	29.3	3.71	8.90	25.9	4.37	18.0	2.90	52.2	3.12	4.07	3.69	9.84	8.75	14.1	3.96	8.56	852						
22-9-16 (Furr 16-22D Duplicate)	Separator	39.4166 -107.9751	SE SE	22	7S	95W	6th	16-22D	4/14/2009	11:00	Qualifier	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
											Result	3.93	-10.6	0.632	-1.06	0.308	3.77	13.1	3.89	0.00	-1.36	-0.631	17.5	-0.322	0.121	-0.996	-12.4	1.67	-0.601	-1.09	-0.177	-2.33	2.46	-9.25	-0.574	0.757	-1490				
											Uncertainty (±)	9.67	10.2	4.64	5.56	2.84	10.5	16.5	18.5	7.94	1.87	3.96	16.0	2.39	3.24	2.14	18.0	1.88	1.75	2.02	2.26	5.99	5.39	7.58	1.87	3.70	638				
											MDC	15.5	16.5	7.82	9.28	4.25	17.9	29.4	29.1	9.5	2.97	6.02	24.6	3.87	5.52	3.39	29.5	3.50	2.87	3.11	3.74	9.37	9.62	12.0	3.14	6.42	930				
Field Blank	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Field Blank	6/24/2009	12:05	Qualifier	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
											Result	-8.32	3.60	0.111	-2.66	-0.91	3.20	-4.91	5.91	4.43	-0.423	-0.568	12.1	-0.56	-2.09	1.43	-8.03	-1.11	0.120	-1.26	0.371	-0.384	0.803	2.42	-1.23	3.90	-1010				
											Uncertainty (±)	8.01	12.5	4.60	4.95	2.56	10.4	16.7	15.1	6.78	1.87	4.52	14.9	2.02	3.46	1.82	18.0	1.87	1.88	2.27	2.34	5.78	5.26	7.63	1.88	3.71	578				
											MDC	11.9	19.1	7.84	8.02	4.26	17.7	27.4	25.8	7.83	3.07	6.59	24.8	3.36	5.38	3.26	30.0	2.98	3.17	3.02	3.97	9.85	8.95	13.1	3.10	7.00	871				

Table presents gamma spectroscopy analytical results for the Furr 16-22B and Furr 16-22D wells - current data shaded in gray. Samples were all analyzed by GEL Laboratories, LLC in Charleston, SC

Four Rows:

- 1) Qualifier The laboratory data qualifiers are designated by one or two letters to provide information about the reported results.
- 2) Result Results are the level of activity reported for the individual produced water sample.
- 3) Uncertainty (±) The margin of error, or range of activity, when added to the result.
- 4) MDC The laboratory minimum detectable concentration (MDC) for the analytical method. If the result is less than the reporting limits the radionuclide is reported as 'not detected' (U).

The qualifiers used in the laboratory reports are listed below:

- U - Result is less than the sample specific Minimum Detectable Concentration (MDC) or Minimum Detectable Activity (MDA), Method Detection Limit (MDL), Limits of Detection (LOD), total propagated uncertainty (TPU), or laboratory reporting limit (RL).
- UI - Gamma Spectroscopy Uncertain Identification
- NS - Not Sampled (Furr 16-22B was shut-in on April 14, 2009 and was not sampled)
- NA - Not Analyzed
- N/A - Not Applicable

Note: Values shown in blue represent a detection or an uncertain identification. The gamma emitting radionuclides that were detected are naturally occurring potassium-40 (⁴⁰K), lead-212 (²¹²Pb), lead-214 (²¹⁴Pb), and bismuth-214 (²¹⁴Bi) in a few of the samples.

TABLE 5

GAMMA SPECTROSCOPY RESULTS FOR PRODUCED WATER SAMPLES
 Furr 16-22B and Furr 16-22D Tier II Wells
 Laramie Energy II - Rulison Field, Garfield County, Colorado

(Table Continued)

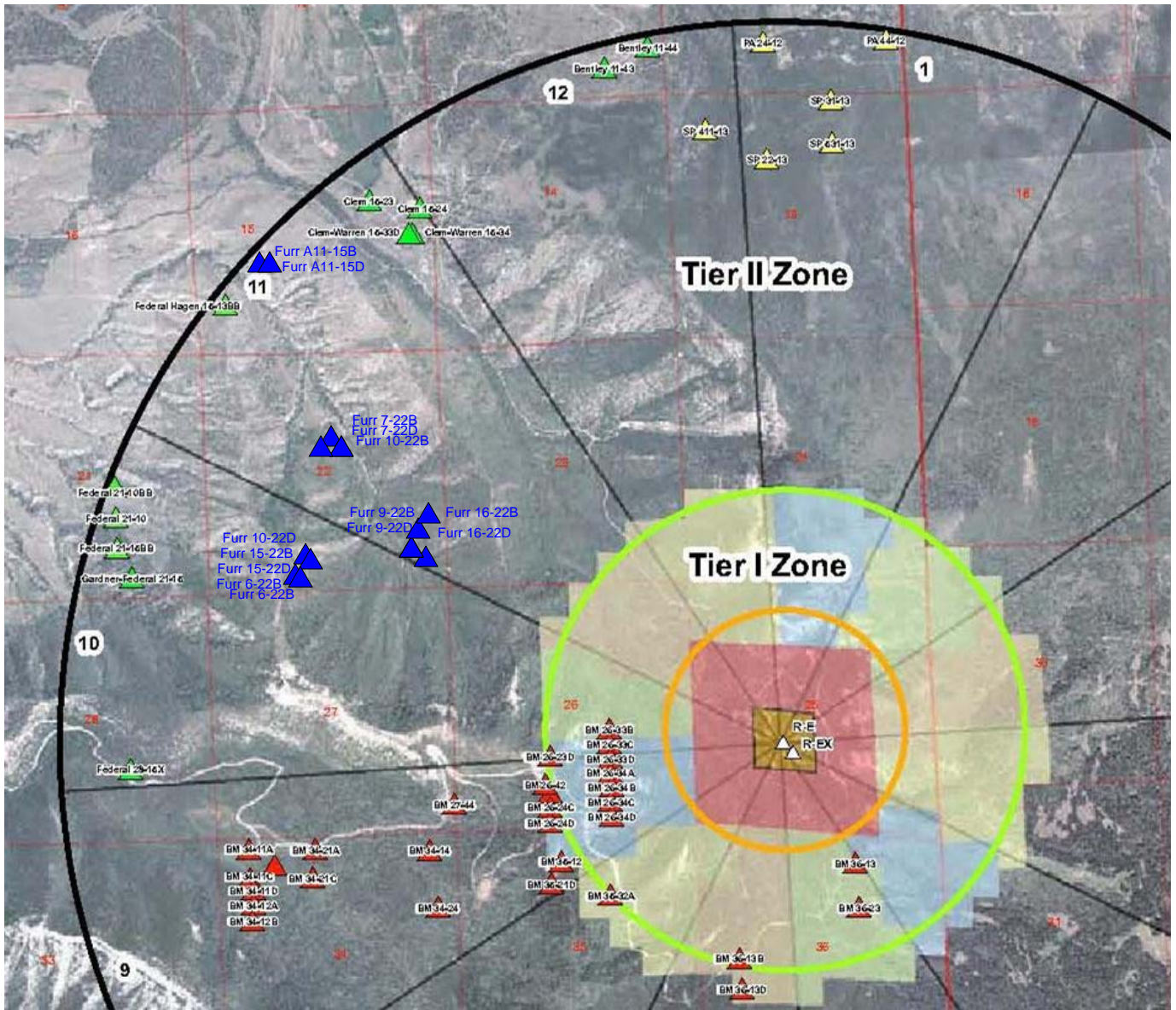
WELL NAME/No.	Sample Collection Point	Latitude/ Longitude	QTR/QTR	SEC	TWP	RNG	P.M.	SAMPLE ID	DATE SAMPLED	TIME SAMPLED	Gamma Emitting Radionuclides	Pb-210 Result (pCi/L)	Pb-212 Result (pCi/L)	Pb-214 Result (pCi/L)	Mn-54 Result (pCi/L)	Hg-203 Result (pCi/L)	Nd-147 Result (pCi/L)	Np-239 Result (pCi/L)	Nb-94 Result (pCi/L)	Nb-95 Result (pCi/L)	K-40 Result (pCi/L)	Pm-144 Result (pCi/L)	Pm-146 Result (pCi/L)	Ra-228 Result (pCi/L)	Ru-106 Result (pCi/L)	Ag-110m Result (pCi/L)	Na-22 Result (pCi/L)	Tl-208 Result (pCi/L)	Th-230 Result (pCi/L)	Th-234 Result (pCi/L)	Sn-113 Result (pCi/L)	U-235 Result (pCi/L)	U-238 Result (pCi/L)	Y-88 Result (pCi/L)	Zn-65 Result (pCi/L)	Zr-95 Result (pCi/L)		
Furr 16-22B	Separator	39.4167 -107.97507	SE SE	22	7S	95W	6th	16-22B	12/17/2008	12:54	Qualifier Result	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
									Result	31.4	-3.14	3.30	0.333	2.44	-16.7	3.69	0.251	-1.36	27.2	-0.00461	0.616	3.91	13.6	-1.81	-0.146	-0.272	802	134	-0.35	-19.5	134	-0.221	-0.378	1.72				
									Uncertainty (±)	347	4.74	6.03	1.84	2.87	58.5	12.9	1.97	3.27	34.0	2.04	2.29	15.7	17.4	1.83	2.00	2.57	5220	128	2.97	16.4	128	2.39	4.28	4.19				
									MDC	517	6.62	8.61	3.10	5.04	97.2	21.3	3.33	5.21	27.3	3.42	4.02	15.6	31.4	2.75	3.31	3.92	1300	140	4.84	23.2	140	3.97	7.16	7.26				
Furr 16-22D	Separator	39.4166 -107.97512	SE SE	22	7S	95W	6th	16-22D	12/17/2008	12:13	Qualifier Result	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
									Result	-315	0.140	7.30	0.566	-0.0842	63.1	10.1	-2.03	3.15	82.8	-1.15	-0.113	6.57	-6.7	-0.317	-2.18	-0.229	320	115	-0.121	10.6	115	0.554	-4.33	-0.501				
									Uncertainty (±)	648	5.38	5.73	2.14	2.90	59.3	15.1	2.06	3.29	39.1	2.59	2.46	10.1	19.6	1.82	2.18	2.73	2430	182	3.01	20.6	182	2.54	5.20	4.21				
									MDC	1070	7.16	9.15	3.69	4.89	111	25.4	3.16	6.06	32.2	3.66	4.03	16.6	32.5	3.04	3.16	4.30	2230	293	4.98	23.5	293	4.38	7.61	7.01				
22-9-16	Separator	39.4166 -107.97512	SE SE	22	7S	95W	6th	16-22D	6/24/2009	12:50	Qualifier Result	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
									Result	-0.942	5.17	0.00	0.182	-1.71	-19.8	-0.0838	0.0467	3.94	62.6	-0.737	-1.41	0.00	1.13	0.131	-2.2	1.37	-828	-17.7	-1.27	-21.5	-17.7	0.0911	-5.15	5.90				
									Uncertainty (±)	57.6	6.75	7.63	2.48	2.81	27.3	13.4	2.41	2.78	44.7	2.47	3.07	17.5	20.4	2.45	2.86	4.60	5300	57.2	2.96	19.1	57.2	3.03	6.71	4.85				
									MDC	94.2	9.10	11.2	4.27	4.33	42.5	22.6	3.99	5.25	34.4	3.96	4.98	16.0	34.1	4.09	4.24	3.75	837	96.1	4.87	24.0	96.1	5.16	9.02	8.95				
Field Blank	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Field Blank	6/24/2009	12:05	Qualifier Result	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
									Result	-309	0.613	-0.377	-0.0957	-1.74	-23.8	6.22	-0.303	2.83	0.00	-0.444	-0.0827	-8.32	1.73	-0.887	0.212	1.56	0.00	15.5	-0.823	-0.877	15.5	-0.723	-0.977	3.86				
									Uncertainty (±)	329	4.61	4.57	1.81	2.71	20.1	14.5	1.73	2.26	27.1	1.98	2.37	8.01	16.1	1.74	1.87	3.47	10600	128	2.37	18.5	128	2.14	3.71	3.51				
									MDC	492	7.21	7.46	3.07	3.68	29.5	24.9	2.80	4.13	29.0	3.20	3.99	11.9	27.0	2.73	3.16	4.00	1350	152	3.92	26.0	152	3.41	6.02	6.38				

Samples were all analyzed by GEL Laboratories, LLC in Charleston, SC

- Four Rows:
 1) Qualifier The laboratory data qualifiers are designated by one or two letters to provide information about the reported results.
 2) Result Results are the level of activity reported for the individual produced water sample.
 3) Uncertainty The margin of error, or range of activity, when added to the result.
 4) MDC The laboratory minimum detectable concentration (MDC) for the analytical method.
 If the result is less than the reporting limits the radionuclide is reported as 'not detected' (U).

The qualifiers used in the laboratory reports are listed below:
 U - Result is less than the sample specific Minimum Detectable Concentration (MDC) or Minimum Detectable Activity (MDA), Method Detection Limit (MDL), Limits of Detection (LOD), total propagated uncertainty (TPU), or laboratory reporting limit (RL).
 UI - Gamma Spectroscopy Uncertain Identification
 NS - Not Sampled (Furr 16-22B was shut-in on April 14, 2009 and was not sampled)
 NA - Not Analyzed
 N/A - Not Applicable

Note: Values shown in blue represent a detection. The gamma emitting radionuclides that were detected are naturally occurring potassium-40 (⁴⁰K), lead-212 (²¹²Pb), lead-214 (²¹⁴Pb), and bismuth-214 (²¹⁴Bi) in a few of the samples.



Furr 16-22B & Furr 16-22D Quarterly Sampling – Garfield County Colorado

Legend:

- ▲ Existing Laramie II Well
- ▲ Existing EnCana Well
- ▲ Existing Williams Well
- ▲ Existing Noble Well
- △ Project Rulison Well

Project Rulison Lot 11

- 3 Mile Radius Tier II Zone Wells
- 1 Mile Radius – Tier I Zone Wells
- ½ Mile Radius

Section, Township, Range

Monitoring Sectors (1 through 12)



Base Map Adapted from URS 3rd Quarter Report 2008 (November 2008)

PROJECT NO:	008-2362
DRAWN BY:	JWH
DATE:	10/23/09

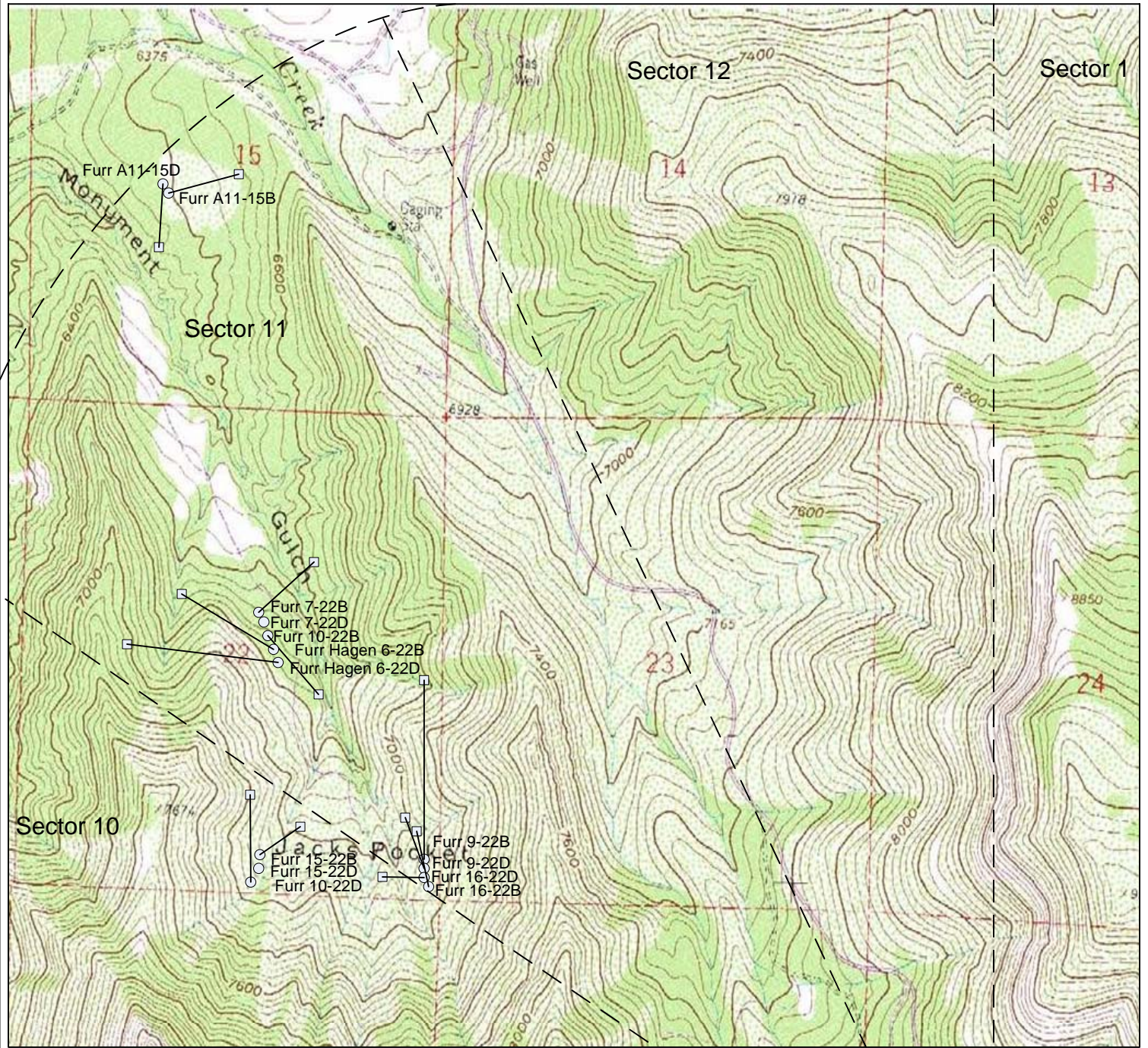
Laramie Energy II
Gas Well Locations
Project Rulison Area



4690 Table Mountain Dr. #200
Golden, CO 80403
TEL 303.237.2072
FAX 303.237-2659

FIGURE

1

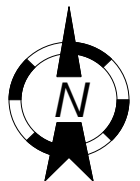


Legend:

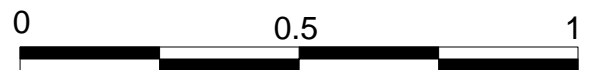
- Vertical Gas Well Location
Furr 7-22D
- Directional Gas Well Location
Furr 16-22B
(square denotes approximate bottom hole location)

URS Rulison SAP
Sector Line

Rulison 3-Mile Radius



Approximate Scale



Furr 16-22B & Furr 16-22D Quarterly Sampling – Garfield County Colorado

PROJECT NO:	008-2362
DRAWN BY:	JWH
DATE:	10/23/09

**Laramie Energy II
Rulison Area Gas Wells**



4690 Table Mountain Dr. #200
Golden, CO 80403
TEL 303.237.2072
FAX 303.237.2659

FIGURE

2

APPENDIX A
ISOTECH LABORATORIES INC.
SAMPLE RESULTS

Lab #: 172337 Job #: 12055
 Sample Name/Number: 16-22 D
 Company: Cordilleran, Div. of Olsson Assoc.
 Date Sampled: 10/01/2009
 Container: LP Tank and 1L Plastic Bottle
 Field/Site Name: Laramie II - Rulison Area Well Mtrg
 Location: Furr Hagen
 Formation/Depth:
 Sampling Point:
 Date Received: 10/02/2009 Date Reported: 11/11/2009

Component	Chemical mol. %	Delta C-13 per mil	Delta D per mil	C-14 conc. pMC	Tritium TU
Carbon Monoxide -----	nd				
Hydrogen Sulfide -----	nd				
Helium -----	0.0028				
Hydrogen -----	0.0033				
Argon -----	na				
Oxygen + Argon -----	0.008				
Nitrogen -----	0.050				
Carbon Dioxide -----	3.69				
Methane -----	88.42			0.4 ± 0.1	< 10.0
Ethane -----	5.35				
Ethylene -----	nd				
Propane -----	1.50				
Iso-butane -----	0.314				
N-butane -----	0.270				
Iso-pentane -----	0.105				
N-pentane -----	0.0716				
Hexanes + -----	0.218				

Total BTU/cu.ft. dry @ 60deg F & 14.7psia, calculated: 1067
 Specific gravity, calculated: 0.647

nd = not detected. na = not analyzed. Isotopic composition of carbon is relative to VPDB. Isotopic composition of hydrogen is relative to VSMOW. Calculations for BTU and specific gravity per ASTM D3588. Chemical compositions are normalized to 100%. Mol. % is approximately equal to vol. %
 Chemical analysis based on standards accurate to within 2%

Lab #: 172338 Job #: 12055
 Sample Name/Number: 16-22 B
 Company: Cordilleran, Div. of Olsson Assoc.
 Date Sampled: 10/01/2009
 Container: LP Tank and 1L Plastic Bottle
 Field/Site Name: Laramie II - Rulison Area Well Mtrg
 Location: Furr Hagen
 Formation/Depth:
 Sampling Point:
 Date Received: 10/02/2009 Date Reported: 11/11/2009

Component	Chemical mol. %	Delta C-13 per mil	Delta D per mil	C-14 conc. pMC	Tritium TU
Carbon Monoxide -----	nd				
Hydrogen Sulfide -----	nd				
Helium -----	0.0030				
Hydrogen -----	0.0026				
Argon -----	na				
Oxygen + Argon -----	0.006				
Nitrogen -----	0.056				
Carbon Dioxide -----	3.58				
Methane -----	88.86			< 0.4	< 10.0
Ethane -----	5.04				
Ethylene -----	nd				
Propane -----	1.47				
Iso-butane -----	0.340				
N-butane -----	0.292				
Iso-pentane -----	0.0830				
N-pentane -----	0.0574				
Hexanes + -----	0.211				

Total BTU/cu.ft. dry @ 60deg F & 14.7psia, calculated: 1065
 Specific gravity, calculated: 0.644

nd = not detected. na = not analyzed. Isotopic composition of carbon is relative to VPDB. Isotopic composition of hydrogen is relative to VSMOW. Calculations for BTU and specific gravity per ASTM D3588. Chemical compositions are normalized to 100%. Mol. % is approximately equal to vol. %
 Chemical analysis based on standards accurate to within 2%

Water Analysis

Lab Number: 172337 Job Number: 12055
Submitter Sample Name: 16-22 D
Submitter Sample ID:
Submitter Job #:
Company: Cordilleran, Div. of Olsson Assoc.
Field or Site: Laramie II - Rulison Area Well Mtrg
Location: Furr Hagen
Depth/Formation:
Container Type: LP Tank and 1L Plastic Bottle
Sample Collected: 10/01/2009 Results Reported: 11/11/2009

Delta D of water -----	na
Delta O-18 of water -----	na
Tritium content of water -----	< 10.0 TU
Delta C-13 of DIC -----	na
Carbon-14 content of DIC -----	na
Delta N-15 of nitrate -----	na
Delta O-18 of nitrate -----	na
Delta S-34 of sulfate -----	na
Delta O-18 of sulfate -----	na

Remarks:

Water Analysis

Lab Number: 172338 Job Number: 12055
Submitter Sample Name: 16-22 B
Submitter Sample ID:
Submitter Job #:
Company: Cordilleran, Div. of Olsson Assoc.
Field or Site: Laramie II - Rulison Area Well Mtrg
Location: Furr Hagen
Depth/Formation:
Container Type: LP Tank and 1L Plastic Bottle
Sample Collected: 10/01/2009 Results Reported: 11/11/2009

Delta D of water -----	na
Delta O-18 of water -----	na
Tritium content of water -----	< 10.0 TU
Delta C-13 of DIC -----	na
Carbon-14 content of DIC -----	na
Delta N-15 of nitrate -----	na
Delta O-18 of nitrate -----	na
Delta S-34 of sulfate -----	na
Delta O-18 of sulfate -----	na

Remarks:

APPENDIX B
GEL LABORATORIES LLC
SAMPLE RESULTS



October 19, 2009

Mr. James Hix
Olsson Associates
4690 Table Mountain Drive
Suite 200
Golden, Colorado 80403

Re: Olsson Associates - Rulison
Work Order: 238218

Dear Mr. Hix:

GEL Laboratories, LLC (GEL) appreciates the opportunity to provide the enclosed analytical results for the sample(s) we received on October 02, 2009. This original data report has been prepared and reviewed in accordance with GEL's standard operating procedures.

Our policy is to provide high quality, personalized analytical services to enable you to meet your analytical needs on time every time. We trust that you will find everything in order and to your satisfaction. If you have any questions, please do not hesitate to call me at (843) 556-8171, ext. 4297.

Sincerely,

Amanda Rasco
Project Manager

Purchase Order: Signed Quote
Enclosures

GEL Chain of Custody and Analytical Request

GEL Laboratories, LLC
2040 Savage Road
Charleston, SC 29407
Phone: (843) 556-8171
Fax: (843) 766-1178

238218

GEL Work Order Number:

Client Name: **OLSSON ASSOCIATES - JAMES HIX** Phone #: **303.231.2072**

Project/Site Name: **LARAMIE II - RULLISON AREA WELL MONITORING 303.231.2659**

Address: **4690 TABLE MOUNTAIN DR, Ste 200, GOLDEN, CO 80403**

Collected by: **T. DOBRANSKY** Send Results To: **JAMES HIX**

Sample Analysis Requested ⁽⁶⁾ (Fill in the number of containers for each test)

Sample ID	*Date Collected (mm-dd-yy)	*Time Collected (Military) (hhmm)	QC Code ^(a)	Field Filtered ^(b)	Sample Matrix ^(c)	Should this sample be considered:		Total number of containers	Preservative Type (6)	Comments
						Radioactive	TSCA Regulated			
16-22B	10/1/09	1130	N	N	W			3		Note: extra sample is required for sample specific QC
16-22D	10/1/09	1140	N	N	W			3		
<div style="border: 2px solid black; border-radius: 50%; width: 100%; height: 100%; display: flex; align-items: center; justify-content: center;"> </div>										

TAT Requested: Normal: Rush: _____ Specify: _____ (Subject to Surcharge) Fax Results: Yes / No

Circle Deliverable: C of A / QC Summary / Level 1 / Level 2 / Level 3 / Level 4

Sample Collection Time Zone: Eastern Pacific Other _____

Chain of Custody Signatures

Relinquished By (Signed)	Date	Time	Received by (signed)	Date	Time
	10/1/09	1600		02/01/09	0915
2					
3					

GEL PM: _____ Method of Shipment: _____ Date Shipped: _____

Airbill #: _____ Airbill #: _____

1.) Chain of Custody Number = Client Determined

2.) QC Codes: N = Normal Sample, TB = Trip Blank, FD = Field Duplicate, EB = Equipment Blank, MS = Matrix Spike Sample, MSD = Matrix Spike Duplicate Sample, G = Grab, C = Composite

3.) Field Filtered: For liquid matrices, indicate with a - Y - for yes the sample was field filtered or - N - for sample was not field filtered.

4.) Matrix Codes: DW=Drinking Water, GW=Groundwater, SW=Surface Water, WW=Waste Water, W=Water, SO=Soil, SD=Sediment, SL=Sludge, SS=Solid Waste, O=Oil, F=Filter, P=Wipe, U=Urine, F=Fecal, N=Nasal

5.) Sample Analysis Requested: Analytical method requested (i.e. 8260B, 6010B/7470A) and number of containers provided for each (i.e. 8260B - 3, 6010B/7470A - 1).

6.) Preservative Type: HA = Hydrochloric Acid, NI = Nitric Acid, SH = Sodium Hydroxide, SA = Sulfuric Acid, AA = Ascorbic Acid, HX = Hexane, ST = Sodium Thiosulfate, If no preservative is added = leave field blank

WHITE = LABORATORY YELLOW = FILE PINK = CLIENT

For Lab Receiving Use Only

Chemically Seal Intact? YES NO

Cooler Temp: **3** C



SAMPLE RECEIPT & REVIEW FORM

Client: ORD		SDG/ARCOC/Work Order: 238218	
Received By: H. Taylor		Date Received: 020609	
Suspected Hazard Information	Yes	No	*If Counts > x2 area background on samples not marked "radioactive", contact the Radiation Safety Group of further investigation.
COC/Samples marked as radioactive?		<input checked="" type="checkbox"/>	Maximum Counts Observed*: 60cpm
Classified Radioactive II or III by RSO?		<input checked="" type="checkbox"/>	
COC/Samples marked containing PCBs?		<input checked="" type="checkbox"/>	
Shipped as a DOT Hazardous?		<input checked="" type="checkbox"/>	Hazard Class Shipped: UN#:
Samples identified as Foreign Soil?		<input checked="" type="checkbox"/>	

Sample Receipt Criteria		Yes	NA	No	Comments/Qualifiers (Required for Non-Conforming Items)
1	Shipping containers received intact and sealed?	<input checked="" type="checkbox"/>			Circle Applicable: seals broken damaged container leaking container other (describe)
2	Samples requiring cold preservation within (0 ≤ 6 deg. C)?	<input checked="" type="checkbox"/>			ice bags 3 Preservation Method: blue ice dry ice none other (describe)
3	Chain of custody documents included with shipment?	<input checked="" type="checkbox"/>			
4	Sample containers intact and sealed?	<input checked="" type="checkbox"/>			Circle Applicable: seals broken damaged container leaking container other (describe)
5	Samples requiring chemical preservation at proper pH?				Sample ID's, containers affected and observed pH: If Preservation added, Lot#:
6	VOA vials free of headspace (defined as < 6mm bubble)?		<input checked="" type="checkbox"/>		Sample ID's and containers affected:
7	Are Encore containers present?			<input checked="" type="checkbox"/>	(If yes, immediately deliver to Volatiles laboratory)
8	Samples received within holding time?	<input checked="" type="checkbox"/>			Id's and tests affected:
9	Sample ID's on COC match ID's on bottles?	<input checked="" type="checkbox"/>			Sample ID's and containers affected:
10	Date & time on COC match date & time on bottles?	<input checked="" type="checkbox"/>			Sample ID's affected:
11	Number of containers received match number indicated on COC?	<input checked="" type="checkbox"/>			Sample ID's affected:
12	COC form is properly signed in relinquished/received sections?	<input checked="" type="checkbox"/>			

Comments:
9660 0451 3545 -3°

GEL LABORATORIES LLC

2040 Savage Road Charleston SC 29407 – (843) 556-8171 – www.gel.com

Certificate of Analysis Report for

CORD001 Olsson Associates

Client SDG: 238218 GEL Work Order: 238218

The Qualifiers in this report are defined as follows:

- * A quality control analyte recovery is outside of specified acceptance criteria
- ** Analyte is a surrogate compound
- U Analyte was analyzed for, but not detected above the MDL, MDA, or LOD.
- UI Gamma Spectroscopy--Uncertain identification

Where the analytical method has been performed under NELAP certification, the analysis has met all of the requirements of the NELAC standard unless qualified on the Certificate of Analysis.

The designation ND, if present, appears in the result column when the analyte concentration is not detected above the detection limit.

This data report has been prepared and reviewed in accordance with GEL Laboratories LLC standard operating procedures. Please direct any questions to your Project Manager, Amanda Rasco.



Reviewed by

GEL LABORATORIES LLC

2040 Savage Road Charleston SC 29407 – (843) 556–8171 – www.gel.com

Certificate of Analysis

Company : Olsson Associates
 Address : 4690 Table Mountain Drive
 Suite 200
 Golden, Colorado 80403
 Contact: Mr. James Hix
 Project: **Olsson Associates – Rulison**

Report Date: October 19, 2009

Client Sample ID:	16–22B	Project:	CORD00100
Sample ID:	238218001	Client ID:	CORD001
Matrix:	Water		
Collect Date:	01–OCT–09 11:30		
Receive Date:	02–OCT–09		
Collector:	Client		

Parameter	Qualifier	Result	Uncertainty	DL	RL	Units	DF	AnalystDate	Time	Batch	Method
Rad Gamma Spec Analysis											
<i>Gammascpec, Gamma, Liquid "As Received"</i>											
Actinium–228	UI	0.00	+/-12.1	17.2		pCi/L		KXG3 10/06/09	2249	909163	1
Americium–241	U	7.60	+/-14.4	23.2		pCi/L					
Antimony–124	U	1.67	+/-4.83	8.57		pCi/L					
Antimony–125	U	5.38	+/-5.26	9.33		pCi/L					
Barium–133	U	0.881	+/-2.73	4.36		pCi/L					
Barium–140	U	0.820	+/-8.67	14.3		pCi/L					
Beryllium–7	U	-0.107	+/-17.2	28.4		pCi/L					
Bismuth–212	U	7.16	+/-15.6	27.2		pCi/L					
Bismuth–214		19.5	+/-8.70	6.38		pCi/L					
Cerium–139	U	-1.97	+/-1.95	3.09		pCi/L					
Cerium–141	U	1.36	+/-3.61	6.10		pCi/L					
Cerium–144	U	3.43	+/-14.1	23.8		pCi/L					
Cesium–134	U	0.565	+/-2.50	4.26		pCi/L					
Cesium–136	U	-0.589	+/-3.40	5.73		pCi/L					
Cesium–137	U	0.433	+/-2.13	3.67	5.00	pCi/L					
Chromium–51	U	-5.4	+/-18.3	30.6		pCi/L					
Cobalt–56	U	0.180	+/-1.97	3.30		pCi/L					
Cobalt–57	U	2.67	+/-1.73	3.07		pCi/L					
Cobalt–58	U	-0.88	+/-2.03	3.27		pCi/L					
Cobalt–60	U	1.32	+/-2.24	3.98		pCi/L					
Europium–152	U	-3.69	+/-5.97	9.75		pCi/L					
Europium–154	U	0.355	+/-6.25	10.6		pCi/L					
Europium–155	U	0.0159	+/-7.73	13.1		pCi/L					
Iridium–192	U	0.730	+/-1.94	3.36		pCi/L					
Iron–59	U	1.38	+/-4.12	7.24		pCi/L					
Krypton–85	U	706	+/-496	797		pCi/L					
Lead–210	U	-146	+/-524	722		pCi/L					
Lead–212	U	2.04	+/-5.33	6.66		pCi/L					
Lead–214	UI	0.00	+/-6.03	9.37		pCi/L					
Manganese–54	U	-1.93	+/-2.05	3.13		pCi/L					
Mercury–203	U	-0.682	+/-2.07	3.49		pCi/L					
Neodymium–147	U	4.96	+/-17.6	29.4		pCi/L					
Neptunium–239	U	5.50	+/-13.5	23.2		pCi/L					
Niobium–94	U	0.473	+/-1.71	2.96		pCi/L					
Niobium–95	U	0.997	+/-2.16	3.75		pCi/L					
Potassium–40	UI	0.00	+/-47.8	29.6		pCi/L					
Promethium–144	U	-0.564	+/-1.83	3.02		pCi/L					
Promethium–146	U	-1.13	+/-2.58	4.14		pCi/L					

GEL LABORATORIES LLC

2040 Savage Road Charleston SC 29407 – (843) 556–8171 – www.gel.com

Certificate of Analysis

Company : Olsson Associates
 Address : 4690 Table Mountain Drive
 Suite 200
 Golden, Colorado 80403
 Contact: Mr. James Hix
 Project: **Olsson Associates – Rulison**

Report Date: October 19, 2009

Client Sample ID: 16–22B Project: CORD00100
 Sample ID: 238218001 Client ID: CORD001

Parameter	Qualifier	Result	Uncertainty	DL	RL	Units	DF	Analyst	Date	Time	Batch	Method
Rad Gamma Spec Analysis												
<i>Gammascpec, Gamma, Liquid "As Received"</i>												
Radium–228	UI	0.00	+/-12.1	17.2		pCi/L						
Ruthenium–106	U	8.42	+/-18.2	32.1		pCi/L						
Silver–110m	U	-0.728	+/-1.92	3.17		pCi/L						
Sodium–22	U	0.126	+/-2.23	3.77		pCi/L						
Thallium–208	U	2.39	+/-3.76	3.33		pCi/L						
Thorium–230	U	54.1	+/-942	1520		pCi/L						
Thorium–234	U	138	+/-178	178		pCi/L						
Tin–113	U	-1.04	+/-2.42	3.94		pCi/L						
Uranium–235	U	-3.37	+/-18.5	25.9		pCi/L						
Uranium–238	U	138	+/-178	178		pCi/L						
Yttrium–88	U	0.699	+/-2.12	3.75		pCi/L						
Zinc–65	U	-2.95	+/-4.23	6.71		pCi/L						
Zirconium–95	U	-0.199	+/-3.42	5.72		pCi/L						
Rad Gas Flow Proportional Counting												
<i>GFPC, Chlorine–36 liquid "As Received"</i>												
Chlorine–36	U	37.1	+/-135	234	100	pCi/L		DXM	10/10/09	2318	906787	2
<i>GFPC, Gross A/B, liquid "As Received"</i>												
Alpha		26.0	+/-11.5	15.9	5.00	pCi/L		DXF3	10/14/09	1240	909085	3
Beta	U	11.1	+/-10.9	18.3	5.00	pCi/L						
<i>GFPC, Sr90, liquid "As Received"</i>												
Strontium–90	U	0.103	+/-0.785	1.44	2.00	pCi/L		JXR1	10/15/09	2235	909097	4
Rad Liquid Scintillation Analysis												
<i>Liquid Scint Tc99, Liquid "As Received"</i>												
Technetium–99	U	4.47	+/-27.2	46.8	50.0	pCi/L		AXW	10/13/09	1116	909218	5
Rad Total Uranium												
<i>KPA, Total U, Liquid "As Received"</i>												
Total Uranium	U	0.0175	+/-0.0161	0.928	1.00	ug/L		BXF1	10/07/09	1310	909268	6

The following Analytical Methods were performed

Method	Description	Analyst Comments
1	EPA 901.1	
2	GL–RAD–A–033	
3	EPA 900.0	
4	EPA 905.0 Modified	
5	DOE EML HASL–300, Tc–02–RC Modified	
6	ASTM D 5174	

GEL LABORATORIES LLC

2040 Savage Road Charleston SC 29407 – (843) 556-8171 – www.gel.com

Certificate of Analysis

Company : Olsson Associates
Address : 4690 Table Mountain Drive
Suite 200
Golden, Colorado 80403
Contact: Mr. James Hix
Project: **Olsson Associates – Rulison**

Report Date: October 19, 2009

Client Sample ID: 16-22B
Sample ID: 238218001

Project: CORD00100
Client ID: CORD001

Parameter	Qualifier	Result	Uncertainty	DL	RL	Units	DF	Analyst	Date	Time	Batch	Method
Surrogate/Tracer recovery	Test				Result	Nominal	Recovery%				Acceptable Limits	
Potassium Chloride Carrier	GFPC, Chlorine-36 liquid "As Received"						98.1				(25%-125%)	
Strontium Carrier	GFPC, Sr90, liquid "As Received"						57.1				(25%-125%)	
Technetium-99m Tracer	Liquid Scint Tc99, Liquid "As Received"						78.6				(15%-125%)	

GEL LABORATORIES LLC

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Certificate of Analysis

Company : Olsson Associates
Address : 4690 Table Mountain Drive
Suite 200
Golden, Colorado 80403
Contact: Mr. James Hix
Project: **Olsson Associates – Rulison**

Report Date: October 19, 2009

Client Sample ID: 16-22D
Sample ID: 238218002
Matrix: Water
Collect Date: 01-OCT-09 11:40
Receive Date: 02-OCT-09
Collector: Client

Project: CORD00100
Client ID: CORD001

Parameter	Qualifier	Result	Uncertainty	DL	RL	Units	DF	AnalystDate	Time	Batch	Method
Rad Gamma Spec Analysis											
<i>Gammascpec, Gamma, Liquid "As Received"</i>											
Actinium-228	U	5.78	+/-10.4	16.5		pCi/L		KXG3 10/06/09	2250	909163	1
Americium-241	U	-2.63	+/-14.3	24.5		pCi/L					
Antimony-124	U	-4.23	+/-4.09	5.50		pCi/L					
Antimony-125	U	0.697	+/-4.95	8.41		pCi/L					
Barium-133	U	-3.35	+/-2.73	3.56		pCi/L					
Barium-140	U	3.20	+/-7.31	12.5		pCi/L					
Beryllium-7	U	9.60	+/-14.8	26.0		pCi/L					
Bismuth-212	U	0.631	+/-14.1	24.2		pCi/L					
Bismuth-214		12.7	+/-8.27	6.09		pCi/L					
Cerium-139	U	-1.39	+/-1.75	2.77		pCi/L					
Cerium-141	U	0.355	+/-3.13	5.25		pCi/L					
Cerium-144	U	-3.83	+/-12.1	19.8		pCi/L					
Cesium-134	U	1.54	+/-2.21	4.00		pCi/L					
Cesium-136	U	0.946	+/-3.16	5.44		pCi/L					
Cesium-137	U	0.496	+/-2.52	4.18	5.00	pCi/L					
Chromium-51	U	20.3	+/-16.4	29.9		pCi/L					
Cobalt-56	U	-0.475	+/-1.78	2.92		pCi/L					
Cobalt-57	U	0.448	+/-1.58	2.69		pCi/L					
Cobalt-58	U	-0.729	+/-1.83	2.98		pCi/L					
Cobalt-60	U	-0.576	+/-1.85	3.02		pCi/L					
Europium-152	U	-2.71	+/-5.32	8.77		pCi/L					
Europium-154	U	-1.89	+/-5.66	9.28		pCi/L					
Europium-155	U	-1.78	+/-6.77	11.3		pCi/L					
Iridium-192	U	-2.63	+/-1.69	2.59		pCi/L					
Iron-59	U	-1.02	+/-3.67	5.86		pCi/L					
Krypton-85	U	-2770	+/-605	686		pCi/L					
Lead-210	U	171	+/-531	942		pCi/L					
Lead-212	UI	0.00	+/-4.66	7.07		pCi/L					
Lead-214	UI	0.00	+/-7.03	9.57		pCi/L					
Manganese-54	U	-0.429	+/-1.65	2.72		pCi/L					
Mercury-203	U	0.815	+/-2.18	3.42		pCi/L					
Neodymium-147	U	-4.86	+/-14.8	23.7		pCi/L					
Neptunium-239	U	7.85	+/-12.6	21.9		pCi/L					
Niobium-94	U	-0.797	+/-1.57	2.56		pCi/L					
Niobium-95	U	1.53	+/-1.86	3.41		pCi/L					
Potassium-40		61.6	+/-31.7	29.6		pCi/L					
Promethium-144	U	-0.54	+/-1.72	2.87		pCi/L					
Promethium-146	U	-1.86	+/-2.34	3.64		pCi/L					

GEL LABORATORIES LLC

2040 Savage Road Charleston SC 29407 – (843) 556–8171 – www.gel.com

Certificate of Analysis

Company : Olsson Associates
 Address : 4690 Table Mountain Drive
 Suite 200
 Golden, Colorado 80403
 Contact: Mr. James Hix
 Project: **Olsson Associates – Rulison**

Report Date: October 19, 2009

Client Sample ID: 16–22D Project: CORD00100
 Sample ID: 238218002 Client ID: CORD001

Parameter	Qualifier	Result	Uncertainty	DL	RL	Units	DF	Analyst	Date	Time	Batch	Method
Rad Gamma Spec Analysis												
<i>Gammascpec, Gamma, Liquid "As Received"</i>												
Radium–228	U	5.78	+/-10.4	16.5		pCi/L						
Ruthenium–106	U	-7.82	+/-15.0	23.0		pCi/L						
Silver–110m	U	-2.73	+/-1.88	2.84		pCi/L						
Sodium–22	U	-0.756	+/-2.03	3.33		pCi/L						
Thallium–208	U	1.69	+/-2.97	3.84		pCi/L						
Thorium–230	UI	0.00	+/-12500	1510		pCi/L						
Thorium–234	U	-42.3	+/-154	209		pCi/L						
Tin–113	U	-1.02	+/-2.12	3.44		pCi/L						
Uranium–235	U	0.285	+/-12.7	21.1		pCi/L						
Uranium–238	U	-42.3	+/-154	209		pCi/L						
Yttrium–88	U	-0.0891	+/-1.87	3.07		pCi/L						
Zinc–65	U	0.989	+/-4.14	6.18		pCi/L						
Zirconium–95	U	0.475	+/-3.13	5.41		pCi/L						
Rad Gas Flow Proportional Counting												
<i>GFPC, Chlorine–36 liquid "As Received"</i>												
Chlorine–36	U	159	+/-107	173	100	pCi/L		DXM	10/12/09	0839	906787	2
<i>GFPC, Gross A/B, liquid "As Received"</i>												
Alpha	U	6.70	+/-9.46	16.3	5.00	pCi/L		DXF3	10/14/09	1240	909085	3
Beta	U	7.27	+/-11.3	19.1	5.00	pCi/L						
<i>GFPC, Sr90, liquid "As Received"</i>												
Strontium–90	U	0.826	+/-1.13	1.92	2.00	pCi/L		JXR1	10/15/09	2235	909097	4
Rad Liquid Scintillation Analysis												
<i>Liquid Scint Tc99, Liquid "As Received"</i>												
Technetium–99	U	3.17	+/-27.3	47.0	50.0	pCi/L		AXW	10/13/09	1148	909218	5
Rad Total Uranium												
<i>KPA, Total U, Liquid "As Received"</i>												
Total Uranium	U	0.00	+/-0.00	0.928	1.00	ug/L		BXF1	10/07/09	1313	909268	6

The following Analytical Methods were performed

Method	Description	Analyst Comments
1	EPA 901.1	
2	GL–RAD–A–033	
3	EPA 900.0	
4	EPA 905.0 Modified	
5	DOE EML HASL–300, Tc–02–RC Modified	
6	ASTM D 5174	

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Certificate of Analysis

Company : Olsson Associates
Address : 4690 Table Mountain Drive
Suite 200
Golden, Colorado 80403
Contact: Mr. James Hix
Project: **Olsson Associates – Rulison**

Report Date: October 19, 2009

Client Sample ID: 16-22D
Sample ID: 238218002

Project: CORD00100
Client ID: CORD001

Parameter	Qualifier	Result	Uncertainty	DL	RL	Units	DF	Analyst	Date	Time	Batch	Method
Surrogate/Tracer recovery	Test				Result	Nominal	Recovery%					Acceptable Limits
Potassium Chloride Carrier	GFPC, Chlorine-36 liquid "As Received"						103					(25%-125%)
Strontium Carrier	GFPC, Sr90, liquid "As Received"						57.1					(25%-125%)
Technetium-99m Tracer	Liquid Scint Tc99, Liquid "As Received"						78.2					(15%-125%)

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QC Summary

Report Date: October 19, 2009

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Olsson Associates
4690 Table Mountain Drive
Suite 200
Golden, Colorado

Contact: Mr. James Hix

Workorder: 238218

Parmname	NOM	Sample	Qual	QC	Units	RPD%	REC%	Range	Anlst	Date	Time
Rad Gamma Spec											
Batch	909163										
	QC1201939666 238218001 DUP										
Actinium-228	UI	0.00	UI	0.00	pCi/L	30.7			N/A	KXG3	10/07/09 05:39
		+/-12.1		+/-17.0							
Americium-241	U	7.60	U	2.04	pCi/L	116			N/A		
		+/-14.4		+/-17.5							
Antimony-124	U	1.67	U	-4.26	pCi/L	459			N/A		
		+/-4.83		+/-5.49							
Antimony-125	U	5.38	U	2.32	pCi/L	79.4			N/A		
		+/-5.26		+/-6.93							
Barium-133	U	0.881	U	2.75	pCi/L	103			N/A		
		+/-2.73		+/-3.26							
Barium-140	U	0.820	U	1.32	pCi/L	46.8			N/A		
		+/-8.67		+/-10.2							
Beryllium-7	U	-0.107	U	7.74	pCi/L	206			N/A		
		+/-17.2		+/-21.0							
Bismuth-212	U	7.16	U	11.2	pCi/L	44.4			N/A		
		+/-15.6		+/-18.0							
Bismuth-214		19.5		16.8	pCi/L	15.2		(0% - 100%)			
		+/-8.70		+/-10.7							
Cerium-139	U	-1.97	U	1.58	pCi/L	1810			N/A		
		+/-1.95		+/-2.27							
Cerium-141	U	1.36	U	-4.01	pCi/L	406			N/A		
		+/-3.61		+/-4.71							
Cerium-144	U	3.43	U	17.4	pCi/L	134			N/A		
		+/-14.1		+/-16.8							
Cesium-134	U	0.565	U	1.18	pCi/L	70.5			N/A		
		+/-2.50		+/-2.53							
Cesium-136	U	-0.589	U	-0.125	pCi/L	130			N/A		
		+/-3.40		+/-4.05							
Cesium-137	U	0.433	U	-1.67	pCi/L	340			N/A		
		+/-2.13		+/-2.31							
Chromium-51	U	-5.4	U	28.5	pCi/L	293			N/A		
		+/-18.3		+/-22.2							
Cobalt-56	U	0.180	U	-0.487	pCi/L	434			N/A		
		+/-1.97		+/-2.08							
Cobalt-57	U	2.67	U	2.57	pCi/L	3.74			N/A		
		+/-1.73		+/-2.09							
Cobalt-58	U	-0.88	U	-0.953	pCi/L	7.92			N/A		
		+/-2.03		+/-2.14							
Cobalt-60	U	1.32	U	-0.447	pCi/L	405			N/A		

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QC Summary

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Parmname	NOM	Sample	Qual	QC	Units	RPD%	REC%	Range	Anlst	Date	Time
Rad Gamma Spec Batch 909163											
Europium-152	U	+/-2.24 -3.69	U	+/-2.28 2.90	pCi/L	1680		N/A	KXG3	10/07/09	05:39
Europium-154	U	+/-5.97 0.355	U	+/-7.05 0.0246	pCi/L	174		N/A			
Europium-155	U	+/-6.25 0.0159	U	+/-6.93 9.54	pCi/L	199		N/A			
Iridium-192	U	+/-7.73 0.730	U	+/-9.58 -1.5	pCi/L	578		N/A			
Iron-59	U	+/-1.94 1.38	U	+/-2.34 1.51	pCi/L	8.74		N/A			
Krypton-85	U	+/-4.12 706	U	+/-4.20 -1650	pCi/L	500		N/A			
Lead-210	U	+/-496 -146	U	+/-735 -634	pCi/L	125		N/A			
Lead-212	U	+/-524 2.04	U	+/-480 0.103	pCi/L	181		N/A			
Lead-214	UI	+/-5.33 0.00		+/-5.41 14.2	pCi/L	40.0		(0% - 100%)			
Manganese-54	U	+/-6.03 -1.93	U	+/-8.69 -0.727	pCi/L	90.5		N/A			
Mercury-203	U	+/-2.05 -0.682	U	+/-2.23 -1.79	pCi/L	89.7		N/A			
Neodymium-147	U	+/-2.07 4.96	U	+/-2.63 -21	pCi/L	324		N/A			
Neptunium-239	U	+/-17.6 5.50	U	+/-20.1 6.96	pCi/L	23.5		N/A			
Niobium-94	U	+/-13.5 0.473	U	+/-17.1 -0.751	pCi/L	883		N/A			
Niobium-95	U	+/-1.71 0.997	U	+/-2.02 -3.23	pCi/L	378		N/A			
Potassium-40	UI	+/-2.16 0.00		+/-2.89 57.1	pCi/L	41.3		(0% - 100%)			
Promethium-144	U	+/-47.8 -0.564	U	+/-42.5 -0.176	pCi/L	105		N/A			
Promethium-146	U	+/-1.83 -1.13	U	+/-2.00 0.945	pCi/L	2200		N/A			
Radium-228	UI	+/-2.58 0.00	UI	+/-3.18 0.00	pCi/L	30.7		N/A			
Ruthenium-106	U	+/-12.1 8.42	U	+/-17.0 -20.4	pCi/L	482		N/A			
Silver-110m	U	+/-18.2 -0.728	U	+/-18.7 1.90	pCi/L	448		N/A			
Sodium-22	U	+/-1.92 0.126	U	+/-2.07 0.0399	pCi/L	104		N/A			

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Parmname	NOM	Sample	Qual	QC	Units	RPD%	REC%	Range	Anlst	Date	Time
Rad Gamma Spec											
Batch	909163										
Thallium-208	U	+/-2.23 2.39	U	+/-2.47 -1.75	pCi/L	1290		N/A	KXG3	10/07/09	05:39
Thorium-230	U	+/-3.76 54.1	U	+/-2.84 784	pCi/L	174		N/A			
Thorium-234	U	+/-942 138	U	+/-5130 6.52	pCi/L	182		N/A			
Tin-113	U	+/-178 -1.04	U	+/-176 -2.37	pCi/L	78.1		N/A			
Uranium-235	U	+/-2.42 -3.37	U	+/-2.94 -19.5	pCi/L	141		N/A			
Uranium-238	U	+/-18.5 138	U	+/-19.8 6.52	pCi/L	182		N/A			
Yttrium-88	U	+/-178 0.699	U	+/-176 0.317	pCi/L	75.3		N/A			
Zinc-65	U	+/-2.12 -2.95	U	+/-3.23 -6.1	pCi/L	69.6		N/A			
Zirconium-95	U	+/-4.23 -0.199	U	+/-5.51 3.33	pCi/L	225		N/A			
		+/-3.42		+/-3.97							
QC1201939668	LCS										
Actinium-228			U	-14	pCi/L					10/07/09	08:17
Americium-241	1240			+/-37.4 1440	pCi/L		116	(75%-125%)			
Antimony-124			U	+/-216 3.24	pCi/L						
Antimony-125			U	+/-8.05 -7.31	pCi/L						
Barium-133			U	+/-24.3 3.90	pCi/L						
Barium-140			U	+/-10.2 17.8	pCi/L						
Beryllium-7			U	+/-28.0 69.7	pCi/L						
Bismuth-212			U	+/-61.2 -25.8	pCi/L						
Bismuth-214			U	+/-60.4 -0.714	pCi/L						
Cerium-139			U	+/-15.8 4.65	pCi/L						
Cerium-141			U	+/-6.29 4.72	pCi/L						
Cerium-144			U	+/-10.6 -7.31	pCi/L						
				+/-48.9							

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Parmname	NOM	Sample	Qual	QC	Units	RPD%	REC%	Range	Anlst	Date	Time
Rad Gamma Spec											
Batch	909163										
Cesium-134			U	-1.31	pCi/L						
				+/-10.3							
Cesium-136			U	-6.23	pCi/L				KXG3	10/07/09	08:17
				+/-13.4							
Cesium-137	436			448	pCi/L		103	(75%-125%)			
				+/-39.4							
Chromium-51			U	13.5	pCi/L						
				+/-58.7							
Cobalt-56			U	-1.16	pCi/L						
				+/-9.46							
Cobalt-57				28.7	pCi/L						
				+/-9.85							
Cobalt-58			U	1.03	pCi/L						
				+/-7.92							
Cobalt-60	520			559	pCi/L		107	(75%-125%)			
				+/-56.9							
Europium-152			U	5.82	pCi/L						
				+/-21.9							
Europium-154			U	4.83	pCi/L						
				+/-16.6							
Europium-155			U	2.00	pCi/L						
				+/-26.9							
Iridium-192			U	-1.68	pCi/L						
				+/-7.20							
Iron-59			U	4.69	pCi/L						
				+/-18.8							
Krypton-85			U	-3630	pCi/L						
				+/-1850							
Lead-210			U	421	pCi/L						
				+/-2510							
Lead-212			U	-12.3	pCi/L						
				+/-13.9							
Lead-214			U	-5.36	pCi/L						
				+/-17.2							
Manganese-54			U	-5.9	pCi/L						
				+/-7.67							
Mercury-203			U	2.35	pCi/L						
				+/-7.32							
Neodymium-147			U	23.6	pCi/L						
				+/-50.8							
Neptunium-239			U	-9.42	pCi/L						
				+/-56.1							
Niobium-94			U	-2.57	pCi/L						
				+/-7.24							
Niobium-95			U	-0.452	pCi/L						

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Parmname	NOM	Sample	Qual	QC	Units	RPD%	REC%	Range	Anlst	Date	Time
Rad Gamma Spec											
Batch	909163										
Potassium-40			U	+/-8.48 6.67	pCi/L				KXG3	10/07/09	08:17
Promethium-144			U	+/-60.1 0.892	pCi/L						
Promethium-146			U	+/-7.21 5.08	pCi/L						
Radium-228			U	+/-11.6 -14	pCi/L						
Ruthenium-106			U	+/-37.4 -56.6	pCi/L						
Silver-110m				+/-69.8 30.5	pCi/L						
Sodium-22			U	+/-11.0 1.17	pCi/L						
Thallium-208			U	+/-6.03 -0.696	pCi/L						
Thorium-230			U	+/-8.11 -324	pCi/L						
Thorium-234			U	+/-4320 -220	pCi/L						
Tin-113			U	+/-475 -0.287	pCi/L						
Uranium-235			U	+/-9.66 44.2	pCi/L						
Uranium-238			U	+/-49.4 -220	pCi/L						
Yttrium-88			U	+/-475 -1.44	pCi/L						
Zinc-65			U	+/-4.39 -0.129	pCi/L						
Zirconium-95			U	+/-21.7 2.84	pCi/L						
QC1201939665	MB										
Actinium-228			U	+/-13.7 -1.18	pCi/L					10/06/09	22:59
Americium-241			U	+/-8.57 -7.73	pCi/L						
Antimony-124			U	+/-7.60 3.48	pCi/L						
Antimony-125			U	+/-3.73 -0.327	pCi/L						
Barium-133			U	+/-4.54 -1.23	pCi/L						
				+/-2.17							

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QC Summary

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Parmname	NOM	Sample	Qual	QC	Units	RPD%	REC%	Range	Anlst	Date	Time
Rad Gamma Spec											
Batch	909163										
Barium-140			U	-1.73 +/-5.95	pCi/L						
Beryllium-7			U	9.54 +/-12.6	pCi/L				KXG3	10/06/09	22:59
Bismuth-212			U	9.18 +/-12.3	pCi/L						
Bismuth-214			U	-1.52 +/-4.79	pCi/L						
Cerium-139			U	0.795 +/-1.39	pCi/L						
Cerium-141			U	2.24 +/-2.21	pCi/L						
Cerium-144			U	7.92 +/-9.75	pCi/L						
Cesium-134			U	-0.0895 +/-2.01	pCi/L						
Cesium-136			U	0.175 +/-2.12	pCi/L						
Cesium-137			U	1.59 +/-1.60	pCi/L						
Chromium-51			U	-1.22 +/-12.7	pCi/L						
Cobalt-56			U	0.308 +/-1.51	pCi/L						
Cobalt-57			U	-0.511 +/-1.20	pCi/L						
Cobalt-58			U	1.38 +/-1.60	pCi/L						
Cobalt-60			U	0.341 +/-1.74	pCi/L						
Europium-152			U	-0.722 +/-4.94	pCi/L						
Europium-154			U	0.797 +/-4.68	pCi/L						
Europium-155			U	-3.73 +/-5.41	pCi/L						
Iridium-192			U	0.812 +/-1.47	pCi/L						
Iron-59			U	-1.29 +/-3.08	pCi/L						
Krypton-85			UI	0.00 +/-408	pCi/L						
Lead-210			U	-387 +/-219	pCi/L						
Lead-212			U	0.989	pCi/L						

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Parmname	NOM	Sample	Qual	QC	Units	RPD%	REC%	Range	Anlst	Date	Time
Rad Gamma Spec											
Batch	909163										
Lead-214			U	+/-5.24 -1.92	pCi/L				KXG3	10/06/09	22:59
Manganese-54			U	+/-4.18 -0.864	pCi/L						
Mercury-203			U	+/-1.60 1.25	pCi/L						
Neodymium-147			U	+/-1.59 5.36	pCi/L						
Neptunium-239			U	+/-10.9 -2.13	pCi/L						
Niobium-94			U	+/-9.50 -1.49	pCi/L						
Niobium-95			U	+/-2.05 1.27	pCi/L						
Potassium-40			U	+/-1.41 23.4	pCi/L						
Promethium-144			U	+/-18.1 -0.50	pCi/L						
Promethium-146			U	+/-1.80 -0.664	pCi/L						
Radium-228			U	+/-2.15 -1.18	pCi/L						
Ruthenium-106			U	+/-8.57 -3.14	pCi/L						
Silver-110m			U	+/-14.9 -0.655	pCi/L						
Sodium-22			U	+/-1.57 0.345	pCi/L						
Thallium-208			U	+/-1.67 -0.524	pCi/L						
Thorium-230			U	+/-2.28 -176	pCi/L						
Thorium-234			U	+/-1240 -18.6	pCi/L						
Tin-113			U	+/-74.6 -1.12	pCi/L						
Uranium-235			U	+/-2.06 -12.1	pCi/L						
Uranium-238			U	+/-12.8 -18.6	pCi/L						
Yttrium-88			U	+/-74.6 -0.829	pCi/L						
Zinc-65			U	+/-1.76 1.25	pCi/L						

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Parmname	NOM	Sample	Qual	QC	Units	RPD%	REC%	Range	Anlst	Date	Time
Rad Gamma Spec											
Batch	909163										
Zirconium-95			U	3.01	pCi/L				KXG3	10/06/09	22:59
				+/-3.46							
				+/-2.73							
Rad Gas Flow											
Batch	906787										
QC1201933927	237682002	DUP									
Chlorine-36			U	7.67	U	45.8	pCi/L	0.00	N/ADXM2	10/13/09	06:42
				+/-102		+/-104					
QC1201933929	LCS										
Chlorine-36	47900					53900	pCi/L	113	(75%-125%)	10/10/09	16:31
						+/-2360					
QC1201933926	MB										
Chlorine-36			U	-19.1	pCi/L					10/12/09	08:39
				+/-108							
QC1201940114	237682002	MS									
Chlorine-36	47900		U	7.67		56900	pCi/L	119	(75%-125%)	10/10/09	16:30
				+/-102		+/-2370					
Batch	909085										
QC1201939395	238170003	DUP									
Alpha			U	0.0162	U	2.45	pCi/L	0.00	N/A DXF3	10/14/09	09:40
				+/-1.56		+/-2.27					
Beta			U	1.49	U	0.654	pCi/L	0.00	N/A		
				+/-2.12		+/-2.65					
QC1201939398	LCS										
Alpha	77.9					78.9	pCi/L	101	(75%-125%)	10/14/09	09:24
						+/-8.41					
Beta	259					255	pCi/L	98.5	(75%-125%)		
						+/-10.3					
QC1201939394	MB										
Alpha			U	1.95	pCi/L					10/14/09	09:39
				+/-1.92							
Beta			U	0.423	pCi/L						
				+/-1.51							
QC1201939396	238170003	MS									
Alpha	234		U	0.0162		233	pCi/L	99.5	(75%-125%)	10/14/09	09:40
				+/-1.56		+/-24.8					
Beta	776		U	1.49		757	pCi/L	97.5	(75%-125%)		
				+/-2.12		+/-30.8					
QC1201939397	238170003	MSD									
Alpha	234		U	0.0162		236	pCi/L	1.60	101	(0%-20%)	10/14/09
				+/-1.56		+/-26.0					
Beta	776		U	1.49		836	pCi/L	9.99	108	(0%-20%)	
				+/-2.12		+/-32.6					
Batch	909097										
QC1201939430	238218001	DUP									

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Parmname	NOM	Sample	Qual	QC	Units	RPD%	REC%	Range	Anlst	Date	Time
Rad Gas Flow											
Batch	909097										
Strontium-90		U	0.103	U	0.114	pCi/L	0.00		N/A	JXR1	10/15/09 22:35
			+/-0.785		+/-0.409						
QC1201939432	LCS										
Strontium-90	64.7				68.9	pCi/L	107	(75%-125%)			10/16/09 12:24
					+/-3.64						
QC1201939429	MB										
Strontium-90				U	0.195	pCi/L					10/16/09 12:23
					+/-0.476						
QC1201939431	238218001 MS										
Strontium-90	129	U	0.103		149	pCi/L	115	(75%-125%)			10/16/09 12:23
			+/-0.785		+/-6.54						
Rad Liquid Scintillation											
Batch	909218										
QC1201939851	238121008 DUP										
Technetium-99			107		101	pCi/L	5.47	(0% - 100%)	AXW2		10/13/09 12:51
			+/-24.3		+/-24.8						
QC1201939853	LCS										
Technetium-99	1810				1730	pCi/L	95.6	(75%-125%)			10/13/09 13:52
					+/-73.2						
QC1201939850	MB										
Technetium-99				U	6.28	pCi/L					10/13/09 12:20
					+/-21.7						
QC1201939852	238121008 MS										
Technetium-99	1810		107		1840	pCi/L	95.3	(75%-125%)			10/13/09 13:23
			+/-24.3		+/-56.0						
Rad Total U											
Batch	909268										
QC1201939996	238260001 DUP										
Total Uranium			208		213	ug/L	2.45	(0% - 20%)	BXF1		10/07/09 13:27
			+/-17.4		+/-17.8						
QC1201939998	LCS										
Total Uranium	50.0				46.6	ug/L	93.3	(75%-125%)			10/07/09 13:35
					+/-4.12						
QC1201939999	LCS										
Total Uranium	5.00				5.19	ug/L	104	(75%-125%)			10/07/09 13:36
					+/-0.277						
QC1201939995	MB										
Total Uranium				U	0.295	ug/L					10/07/09 13:22
					+/-0.0224						
QC1201939997	238260001 MS										
Total Uranium	50.0		208		266	ug/L	115	(75%-125%)			10/07/09 13:31
			+/-17.4		+/-22.3						

Notes:
The Qualifiers in this report are defined as follows:

** Analyte is a surrogate compound

GEL LABORATORIES LLC

2040 Savage Road Charleston, SC 29407 - (843) 556-8171 - www.gel.com

QC Summary

Workorder: 238218

Page 10 of 10

Parmname	NOM	Sample	Qual	QC	Units	RPD%	REC%	Range	Anlst	Date	Time
<											
>											
A											
B											
BD											
C											
D											
F											
H											
J											
M											
M											
N/A											
ND											
NJ											
R											
U											
UI											
X											
Y											
^											
h											

N/A indicates that spike recovery limits do not apply when sample concentration exceeds spike conc. by a factor of 4 or more.

^ The Relative Percent Difference (RPD) obtained from the sample duplicate (DUP) is evaluated against the acceptance criteria when the sample is greater than five times (5X) the contract required detection limit (RL). In cases where either the sample or duplicate value is less than 5X the RL, a control limit of +/- the RL is used to evaluate the DUP result.

* Indicates that a Quality Control parameter was not within specifications.

For PS, PSD, and SDILT results, the values listed are the measured amounts, not final concentrations.

Where the analytical method has been performed under NELAP certification, the analysis has met all of the requirements of the NELAC standard unless qualified on the QC Summary.

COMPANY – WIDE NONCONFORMANCE REPORT

Mo.Day Yr. 14-OCT-09	Division: Radiochemistry	Quality Criteria: Specifications	Type: Process
Instrument Type: GFPC	Test / Method: GL-RAD-A-033	Matrix Type: Liquid	Client Code: CORD, URSC
Batch ID: 906787	Sample Numbers: See Below		
Potentially affected work order(s)(SDG): 237682,238006,238010,238064,238218			
Application Issues: RDL less than MDA			
Specification and Requirements Nonconformance Description:		NRG Disposition:	
<p>1. Samples 237682002, 237682004, 238006002, 238010002, 238010004, 238010005, 238010007, 238064002,238064004, 238218001 and 238218002 did not meet the required detection limit due to reduced sample aliquot. Sample aliquots were reduced due to the matrix of the samples. Appropriate sample aliquots were analyzed and counted for 500 minutes</p>		<p>1. Reporting results.</p>	

Originator's Name:
Spencer Collins 14-OCT-09

Data Validator/Group Leader:
Nat Long 14-OCT-09

List of current GEL Certifications as of 19 October 2009

State	Certification
Arizona	AZ0668
Arkansas	88-0651
CLIA	42D0904046
California – NELAP	01151CA
Colorado	GEL
Connecticut	PH-0169
Dept. of Navy	NFESC 413
EPA Region 5	WG-15J
Florida – NELAP	E87156
Georgia	E87156 (FL/NELAP)
Georgia DW	967
Hawaii	N/A
ISO 17025	2567.01
Idaho	SC00012
Illinois – NELAP	200029
Indiana	C-SC-01
Kansas – NELAP	E-10332
Kentucky	90129
Louisiana – NELAP	03046
Maryland	270
Massachusetts	M-SC012
Nevada	SC00012
New Jersey – NELAP	SC002
New Mexico	FL NELAP E87156
New York – NELAP	11501
North Carolina	233
North Carolina DW	45709
Oklahoma	9904
Pennsylvania – NELAP	68-00485
South Carolina	10120001/10120002
Tennessee	TN 02934
Texas – NELAP	T104704235-07B-TX
U.S. Dept. of Agriculture	S-52597
Utah – NELAP	GEL
Vermont	VT87156
Virginia	00151
Washington	C1641

APPENDIX C

Furr 16-22B and Furr 16-22D WELL PRODUCTION DATA

COGIS - Monthly Well Production

PRODUCTION DATA REPORT -- [GIS](#)

API #:	05-045-12741	Location:	SESE 22 7S 95W 6
Field:	WILDCAT	Field Code:	99999
Facility Name:	FURR	Facility #:	16-22 B
Operator Name:	LARAMIE ENERGY II, LLC	Operator #:	10232

PRODUCTION YEAR: All

Year	Month	Formation	Sidetrack	Well Status	Days Prod	Product	OIL						Water Prod	Water (psig)		
							BOM	Produced	Sold	Adj.	EOM	Gravity		Tbg.	Csg.	
							GAS						Water Disp. Code	Gas (psig)		
Prod	Flared	Used	Shrinkage	Sold	BTU	Tbg.	Csg.									
2007	Jul	WILLIAMS FORK - CAMEO	00	WO		Oil -> Gas ->										
2008	Jan	WILLIAMS FORK - CAMEO	00	WO		Oil -> Gas ->										
2008	May	WILLIAMS FORK - CAMEO	00	WO		Oil -> Gas ->										
2008	Jun	WILLIAMS FORK - CAMEO	00	WO		Oil -> Gas ->										
2008	Jul	WILLIAMS FORK - CAMEO	00	WO		Oil -> Gas ->										
2008	Aug	WILLIAMS FORK - CAMEO	00	WO		Oil -> Gas ->										
2008	Sep	WILLIAMS FORK - CAMEO	00	WO		Oil -> Gas ->										
2008	Oct	WILLIAMS FORK - CAMEO	00	WO		Oil -> Gas ->										
2008	Nov	WILLIAMS FORK - CAMEO	00	PR	28	Oil -> Gas ->	24,271	9	398	23,873	9	1,077	1,134	M		
2008	Dec	WILLIAMS FORK - CAMEO	00	PR	28	Oil -> Gas ->	30,197	9	1,062	29,135	46	1,077	2,541	M		
2009	Jan	WILLIAMS FORK - CAMEO	00	PR	31	Oil -> Gas ->	25,263	46	847	24,416	80	1,072	1,523	M		
2009	Feb	WILLIAMS FORK - CAMEO	00	PR	23	Oil -> Gas ->	17,410	45	337	17,073	36	1,074	854	M		
2009	Mar	WILLIAMS FORK - CAMEO	00	PR	31	Oil -> Gas ->	19,040	35	870	18,170	60	1,075	955	M		
2009	Apr	WILLIAMS FORK - CAMEO	00	PR	29	Oil -> Gas ->	15,316	51	215	15,101	44	1,093	606	M		
2009	May	WILLIAMS FORK - CAMEO	00	PR	31	Oil -> Gas ->	15,023	52	340	14,683	28	1,092	584	M		
2009	Jun	WILLIAMS FORK - CAMEO	00	PR	30	Oil -> Gas ->	14,339	39		14,339	39	1,071	461	M		
2009	Jul	WILLIAMS FORK - CAMEO	00	PR	31	Oil -> Gas ->	13,518	34	211	13,307	73	1,067	461	M		
2009	Aug	WILLIAMS FORK - CAMEO	00	PR	30	Oil -> Gas ->	12,700	63	296	12,404	2	1,066	406	M		
2009	Sep	WILLIAMS FORK - CAMEO	00	PR	29	Oil -> Gas ->	11,389	65	143	11,246	34	1,069	436	M		
2009	Oct	WILLIAMS FORK - CAMEO	00	PR	31	Oil -> Gas ->	11,833	56	396	11,437	58	1,068	405	M		

COGIS - Monthly Well Production

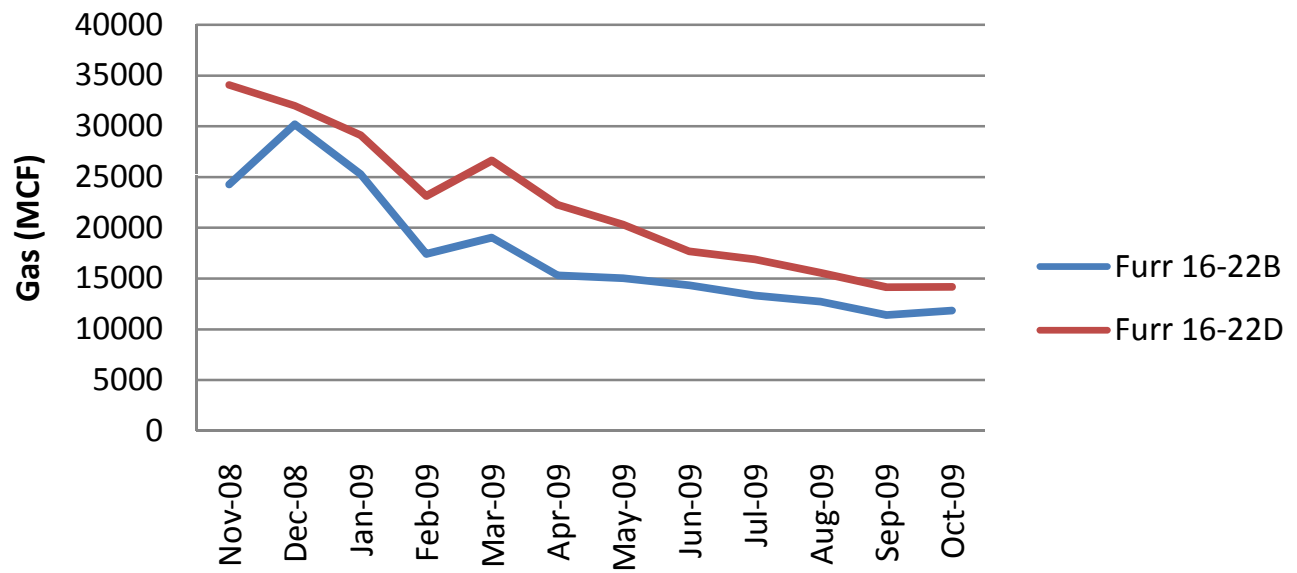
PRODUCTION DATA REPORT --  GIS

API #:	05-045-12611	Location:	SESE 22 7S 95W 6
Field:	WILDCAT	Field Code:	99999
Facility Name:	FURR	Facility #:	16-22 D
Operator Name:	LARAMIE ENERGY II, LLC	Operator #:	10232

PRODUCTION YEAR: All

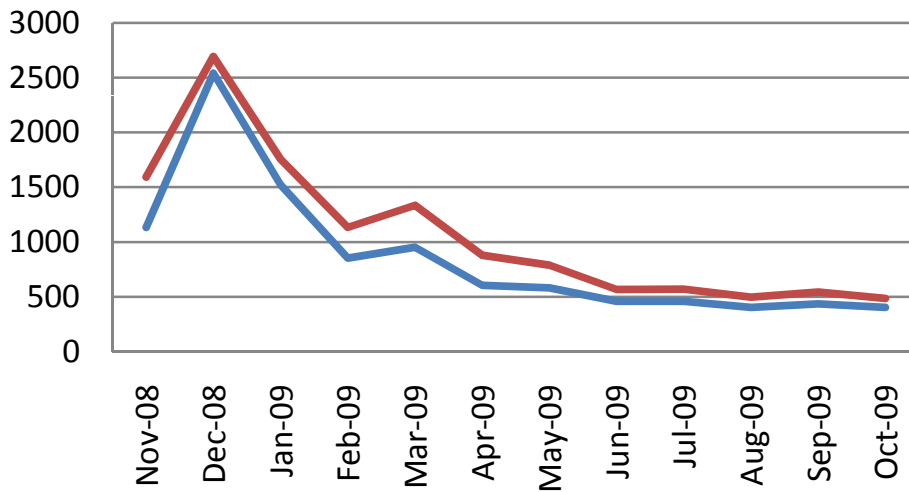
Year	Month	Formation	Sidetrack	Well Status	Days Prod	Product	OIL						Water Prod	Water (psig)	
							BOM	Produced	Sold	Adj.	EOM	Gravity		Tbg.	Csg.
							GAS						Water Disp. Code	Gas (psig)	
Prod	Flared	Used	Shrinkage	Sold	BTU	Tbg.	Csg.								
2007	Jul	WILLIAMS FORK - CAMEO	00	WO		Oil -> Gas ->									
2008	Jan	WILLIAMS FORK - CAMEO	00	WO		Oil -> Gas ->									
2008	May	WILLIAMS FORK - CAMEO	00	WO		Oil -> Gas ->									
2008	Jun	WILLIAMS FORK - CAMEO	00	WO		Oil -> Gas ->									
2008	Jul	WILLIAMS FORK - CAMEO	00	WO		Oil -> Gas ->									
2008	Aug	WILLIAMS FORK - CAMEO	00	WO		Oil -> Gas ->									
2008	Sep	WILLIAMS FORK - CAMEO	00	WO		Oil -> Gas ->									
2008	Oct	WILLIAMS FORK - CAMEO	00	WO		Oil -> Gas ->									
2008	Nov	WILLIAMS FORK - CAMEO	00	PR	28	Oil -> Gas ->	34,070	13		559	33,511	1,077	1,592	M	
2008	Dec	WILLIAMS FORK - CAMEO	00	PR	28	Oil -> Gas ->	13 32,020	88	52	1,126	30,894	1,077	2,694	M	
2009	Jan	WILLIAMS FORK - CAMEO	00	PR	31	Oil -> Gas ->	49 29,132	97	94	976	28,156	1,072	1,757	M	
2009	Feb	WILLIAMS FORK - CAMEO	00	PR	24	Oil -> Gas ->	52 23,124	57	62	448	22,676	1,074	1,134	M	
2009	Mar	WILLIAMS FORK - CAMEO	00	PR	31	Oil -> Gas ->	47 26,621	85	61	1,217	25,404	1,075	1,335	M	
2009	Apr	WILLIAMS FORK - CAMEO	00	PR	30	Oil -> Gas ->	71 22,233	67	63	312	21,921	1,093	879	M	
2009	May	WILLIAMS FORK - CAMEO	00	PR	31	Oil -> Gas ->	75 20,276	33	55	459	19,817	1,092	789	M	
2009	Jun	WILLIAMS FORK - CAMEO	00	PR	30	Oil -> Gas ->	53 17,675	44	55		17,675	1,071	568	M	
2009	Jul	WILLIAMS FORK - CAMEO	00	PR	31	Oil -> Gas ->	42 17,149	93	55	267	16,882	1,067	569	M	
2009	Aug	WILLIAMS FORK - CAMEO	00	PR	30	Oil -> Gas ->	80 15,560			363	15,197	1,066	497	M	
2009	Sep	WILLIAMS FORK - CAMEO	00	PR	29	Oil -> Gas ->	80 14,141	42	53	177	13,964	1,069	542	M	
2009	Oct	WILLIAMS FORK - CAMEO	00	PR	31	Oil -> Gas ->	69 14,159	68	101	474	13,685	1,068	485	M	

Gas Production Data Per Month



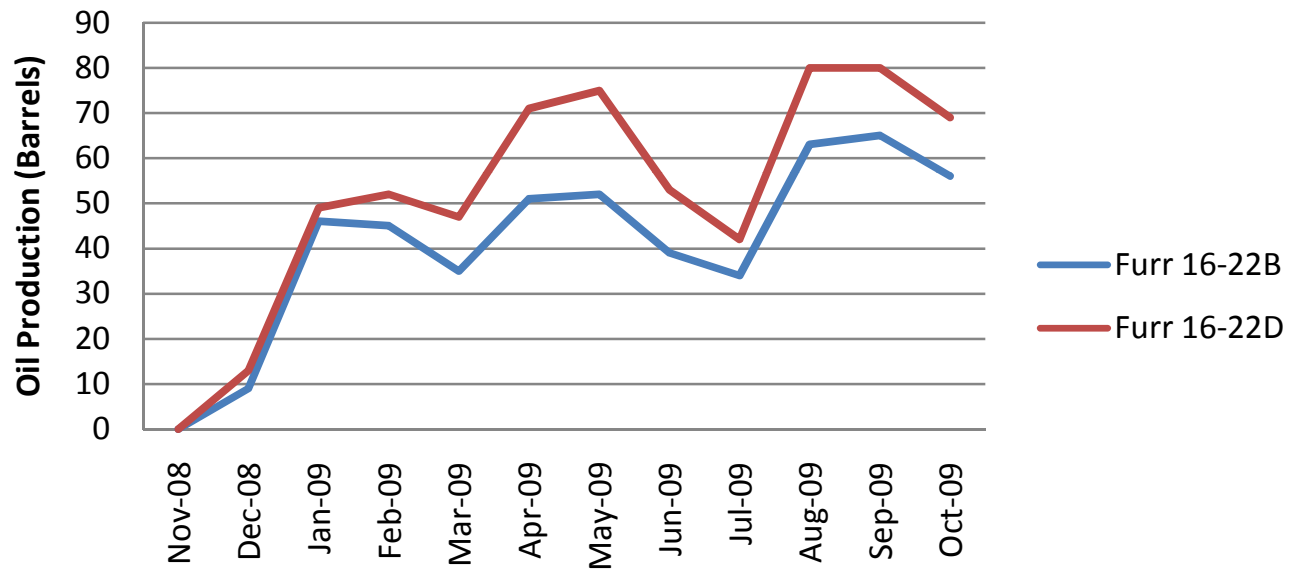
Produced Water Production Per Month

Produced Water Disposed (Barrels)



Furr 16-22B
Furr 16-22D

Oil Production Data Per Month



APPENDIX D

DATA VERIFICATION AND VALIDATION REPORT

RADIOCHEMISTRY DATA QUALITY REVIEW REPORT
Gas Flow Proportional Counting (GFPC) and Liquid Scintillation (LSC),
Uranium in Water by Pulsed-Laser Phosphorimetry (ASTM-D-5174)

SDG: 238218 (GEL)

PROJECT: Garfield County CO, Rulison Project 3rd Quarter Sampling for Olsson Assoc. Golden CO

LABORATORY: GEL Laboratories, LLC, Charleston, South Carolina

SAMPLE MATRIX: Water

SAMPLING DATE (Mo/Yr): October, 2009

NO.SAMPLES: 2

ANALYSES REQUESTED: GEL: GFPC for Cl-36, gross alpha/beta, and Sr-90; LSC for Tc-99, Total U by PLP.

SAMPLE NUMBERS: 16-22B, 16-22D

DATA REVIEWER: John Huntington

QA REVIEWER: Diane Short & Associates, Inc. INITIALS/DATE: _____

Telephone Logs included Yes ___ No X

Contractual Violations Yes ___ No X

The project Quality Assurance Project Plan (QAPP), the EPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review, 2004, the laboratory Standard Operating Procedure (SOP), and the EPA Radiochemistry Methods (current updates) have been referenced by the reviewer to perform this data validation review. The review includes evaluation of calibration, holding times and QC for all samples and a 10% review of the calculation algorithms. General comments regarding the data/ analytical quality are part of the review when raw data are submitted. The EPA qualifiers have been expanded to include a descriptor code and value to define QC violations and their values, per the approval of the project Manager.

I. DELIVERABLES

1. All deliverables were present as specified in the Statement of Work (SOW) or in the project contract.

Yes No

The following is noted:

The GEL Laboratories data package did not include raw data. Only summary QC results were provided. Gross alpha/beta was determined using EPA 900.0, Cl-36 by GL-RAD-A-033, Sr-90 by EPA 905.0, Tc-99 by DOE EML HASL-300, Tc-02-RC Modified, and total uranium by ASTM D-5174.

For the GEL data, a Level II review is conducted.

Please note: In addition to these data, tritium and C-14 results from Isotech laboratories were reported in Lab reports 172337. Only sample results were present with no QC. Therefore, it was not possible to validate the Isotech data.

II. ANALYTICAL REPORT FORMS

1. The Analytical Report or Data Sheets are present and complete for all requested analyses.

Yes No

2. Holding Times

A. The contract holding times were met for all analyses.

Yes No

B. Samples were properly preserved, or applicable preservative was used.

Yes No

3. Chains of Custody (COC)

A. Chains of Custody (COC) were reviewed and all fields were complete, signatures were present and cross outs were clean and initialed.

Yes No

III. CALIBRATION AND STANDARDIZATION

1. Daily counting efficiency (Base Efficiency) for all methods was achieved.

Yes No NA

The GEL Laboratories data package did not include the raw data.

2. The calibration data include a plot of the counting efficiency obtained versus the various weights of salts spiked with a known DPM of the standard; The "best fit" curve or a computer fit equation with the estimated standard deviation meet the method calibration criteria. At least one complete self-absorption curve exists for one detector per array and the efficiency for the standard curve of ≥ 3 standards agree within 95% confidence level.

Yes No NA

GEL data: This documentation is not part of the data package.

3. Reliability of the daily QC check standards are within a 2 to 3 sigma control limit of the mean count of long term counting

Yes ___ No ___ NA

GEL data: Calibration documentation is not part of the data package.

4. The most recent background count duration is at least as long as the sample duration and this background total is within 99% confidence level or 2 to 3 sigma of the average of the last ten background checks on that detector.

Yes ___ No ___ NA

Durations are not part of the data package.

5. The attenuation was with the (beta x r2) limits as appropriate to the method.

Yes ___ No ___ NA

Not part of the data package.

6. There is documentation to verify that the standards are NIST traceable or the equivalent.

Yes ___ No ___ NA

GEL data: This documentation is not part of the data package.

7. Quench factors were reported and noted as acceptable.

Yes ___ No ___ NA

GEL: Quench factors are not reported as part of the data package.

IV. DETECTION AND REPORTING LIMITS

1. Minimal detection concentrations (MDC) with efficiencies were established for all analytes every six months or whenever a significant background or instrument response is expected (e.g., detector change).

Yes No ___ NA ___

CI-36, GEL: for the CI-36 analysis the laboratory provides a nonconformance report stating that the RDL is less than MDA due to reduced aliquots. No qualification is applied.

2. The laboratory reported the results with uncertainties that included all uncertainties associated with the preparation and analytical procedures.

Yes No ___

Samples where uncertainties are greater than the result or the result has been reported as estimated "J" may have unrealistically low MDC values. The uncertainties are multiplied by 1.65. If the result is greater than the reported MDC, the isotope has been qualified UJQ for an unrealistically low MDC. If the value calculated is less than the reported MDA, the activity result is qualified JQ estimated below the MDC.

No such instances are observed and no qualifiers are applied.

V. MATRIX SPIKE

1. Matrix spike (MS) was analyzed for every analysis performed and for every 20 samples or for every matrix whichever is more frequent.

Yes No

Sr-90 – GEL: A matrix spike was conducted on sample 16-22B.

Although not all methods were spiked in this sample set, counting prior sets the recommended frequency of matrix spikes has been met.

2. The MS percent recoveries were within the limits defined in the contract or a guidance limit of 75-125%.

Yes No

3. The samples used for qualification are client samples.

Yes No

VI. MATRIX DUPLICATE

1. The matrix duplicate relative percent difference of the percent recoveries were within the limits defined in the contract or the CLP 20% for water and 35% for soil, or \pm RL for results $< 5 \times$ RL ($\pm 2 \times$ RL for soils).

Yes No NA

Matrix duplicates were analyzed using the same samples as were used for the matrix spikes.

Sr-90 – GEL: The matrix duplicate is in control.

B. Or met the Duplicate Error Ratio (DER) criteria calculations which account for the 2 sigma efficiency values. DER limit is 1.

Yes No NA

VII. LABORATORY CONTROL SAMPLE

1. Laboratory Control Sample (LCS) was analyzed for every analysis performed and for every 20 samples or for every matrix, whichever is more frequent

Yes No

2. The LCS %R for each analyte (background corrected) met the established control limits or the method limits of 75-125%.

Yes No

3. The LCSD %R for each analyte (background corrected) met the established control limits or the method limits of 75-125%.

Yes No NA

LCSDs are not reported.

4. The duplicate relative percent difference of the percent recoveries were within the limits.

Yes No NA

VIII. BLANKS

1. Low-level activities of isotopes were reported for laboratory preparation blanks and met the MDC or background CPM criteria

Yes No

For LSC methods, the MDC of the prep blank shall be less than the calibration MDC or the sample MDC whichever is reported. If all sample results in a batch are reported as detected, then the prep blank MDC must be less than the activity of the lowest MDC in the batch.

For the GFPC methods, if a sample activity is $< 5 \times \text{MDC}$, the activity of the prep blank shall be equivalent to zero when the measurement uncertainty is considered or shall be less than the MDC. If the sample activity is $> 5 \times \text{MDC}$, the activity of the prep blank shall be equivalent to zero when the measurement uncertainty is considered. This is determined from the Normalized Absolute Difference (NAD).

The impact of the blank contamination may be evaluated where appropriate by calculating the Normalized Absolute Difference (NAD) for the Method Blank and subsequent evaluation criteria as defined in the Army Corp. guidance section III and elsewhere. When the NAD is found to be greater than 1.96 but less than 2.58, the sample results are qualified JMB# where # represents the isotopes blank activity. Such results are considered to be estimated and possibly undetected values due to the presence of blank contamination.

GEL, gross alpha/beta: The GEL report provides results for the method blank but does not provide an MDC. MCD levels are provided for samples, and no sample result is $>5x$ MDC. The method blank is reported as a non-detect. Therefore no qualifications are required for method blank levels.

GEL, Sr-90: Sample results are all non-detects and the method blank is reported as a non-detect. No qualifications are required.

GEL, Cl-36: Sample results are all non-detects and the method blank is reported as a non-detect. No qualifications are required.

GEL, Tc-99: Sample results are all non-detects and the method blank is reported as a non-detect. No qualifications are required.

GEL, Total U: Uranium is not detected in these samples. The results for the method blank are reported as a non-detect. No qualifiers are required. Samples do show detected levels of total uranium.

2. The cross talk summary was acceptable and indicated no interferences

Yes No NA

This information is not available in the GEL data packages.

IX. CHEMICAL YIELD SUMMARY

Chemical Yield (Tracer) Summary was analyzed to monitor the accuracy of percent samples recoveries and the percent recoveries were within the control limits.

Yes No NA

GEL: Chemical yield recoveries are reported for Cl-36, Sr-90, and Tc-99. The recoveries reported

are within limits.

X. FIELD QC

A. If Field duplicates or Performance Check Compounds were identified, they met the RPD or % recovery criteria for the project. Guidelines of 35% RPD for water were used unless the reported results are $< 5 \times$ Reporting Limit (RL) in which case $2 \times$ RL difference is acceptable.

Yes ___ No ___ NA X

There are no field duplicates in this set.

B. For low level data, the following DER calculations can be applied.

The Normalized Absolute Difference for isotopes with activities $\leq 5X$ the MDC is considered for data validation rather than the Relative Percent Difference (RPD). If the NAD calculated is $1.96 < x > 3.29$ the results for all samples have been qualified JD# where # represents the NAD calculated. If the NAD calculated were greater than 3.29 the results would be rejected. If the results are less than 1.96 no qualification has been made. Where results are greater than 5X the MDC the RPD is considered for data validation.

Yes ___ No ___ NA X

XI. CALCULATIONS

The calculation algorithm has been checked for 10% of the submitted data packages and accuracy of the reported results is verified.

Yes ___ No ___ NA X

Data for calculation checks are not provided in the GEL data package.

XII. OVERALL ASSESSMENT OF THE CASE

The data are considered fully useable for project purposes with consideration of the follow qualification or comments.

Deliverables

The following is noted:

The GEL Laboratories data package did not include raw data. Only summary QC results were provided. Gross alpha/beta was determined using EPA 900.0, Cl-36 by GL-RAD-A-033, Sr-90 by EPA 905.0, Tc-99 by DOE EML HASL-300, Tc-02-RC Modified, and total uranium by ASTM D-5174.

For the GEL data, a Level II review is conducted.

Please note: In addition to these data, tritium and C-14 results from Isotech laboratories were reported. Only sample results were present with no QC. Therefore, it was not possible to validate the Isotech data.

Detection and Reporting Limits:

Cl-36, GEL: for the Cl-36 analysis the laboratory provides a nonconformance report stating that the RDL is less than MDA due to reduced aliquots. No qualification is applied.

Matrix Spikes

Sr-90 – GEL: A matrix spike was conducted on sample 16-22B.

Although not all methods were spiked in this sample set, counting prior sets the recommended frequency of matrix spikes has been met. The MS is in control.

Matrix Duplicate

Matrix duplicates were analyzed using the same samples as were used for the matrix spikes.

Sr-90 – GEL: The matrix duplicate is in control.

**RADIOCHEMISTRY QUALITY REVIEW REPORT
GAMMA SPECTROMETRY**

SDG: 238218 (GEL)

PROJECT: Garfield County CO, Rulison Project , 3rd Quarter Sampling for Olsson Assoc.
Golden CO

LABORATORY: GEL Laboratories, LLC, Charleston, South Carolina

SAMPLE MATRIX: Water

SAMPLING DATE (Mo/Yr): October, 2009

NO.SAMPLES: 2 water

ANALYSES REQUESTED: Ac-228, Ag-110m, Am-241, Ba-133, Ba-140, Be-7, Bi-212, Bi-214, Ce-139, Ce-141, Ce-144, Co-56, Co-57, Co-58, Co-60, Cr-51, Cs-134, Cs-136, Cs-137, Eu-152, Eu-154, Eu-155, Fe-59, Fe-59, Hg-203, K-40, Kr-85, Mn-54, Na-22, Nb-94, Nb-95, Nd-117, Np-239, Pb-210, Pb-212, Pb-214, Pm-144, Pm-146, Ra-228, Ru-106, Sb-124, Sb-125, Sn-113, Th-230, Th-234, Tl-208, U-235, U-238, Y-88, Zn-65, Zr-95

SAMPLE NUMBERS: 16-22B, 16-22D

DATA REVIEWER: John Huntington

QA REVIEWER Diane Short & Associates, Inc. Initials/ Date

Telephone Logs included Yes ___ No X

Contractual Violations Yes ___ No X

The project Quality Assurance Project Plan (QAPP), the EPA Laboratory Data Validation Functional Guidelines for Evaluating Inorganic Analyses, (SOP), the EPA method 901.1 and the Paragon Standard Operating Procedure SOPS noted in the report have been used by the reviewer to perform this data validation review. Only a limited number of the Data Validation QC items apply to radiochemical analyses. The remaining QC items have been taken from the Paragon Method QC. The EPA qualifiers have been expanded to include a descriptor code and value to define QC violations and their values, per the approval of EPA. All chains of custody, calibrations, QC Forms have been validated and qualifiers added from the QC data on the Forms and an overview of the raw data.

I. DELIVERABLES

A. All deliverables were present as specified in the Statement of Work (SOW) or in the project contract.

Yes No

The following is noted:

The GEL Laboratories data package did not include raw data. Only summary QC results were provided. The method used is EPA 901.1

For the GEL data, a Level II review is conducted.

B. The Analytical Report or Data Sheets are present and complete for all requested analyses.

Yes No

II. INSTRUMENTATION

A. The detector range is appropriate for the samples being analyzed.

Yes No NA

Not part of this review level.

B. The system resolution is within the 1332 KeV range for Co-60.

Yes No NA

Not part of this review level.

C. The resolution is within the 3 KeV range for Co-60.

Yes No NA

Not part of this review level.

III. STANDARDS

A. Standards were NIST traceable or equivalent.

Yes No NA

Not part of this review level.

B. Standards for efficiency checks are counted at least once a month for each detector.

Yes No NA

Not part of this review level.

C. The check source standard has not shifted more than 2 channels from the centroid position.

Yes No NA

Not part of this review level.

D. Samples are counted for a duration long enough to achieve the RDL.

Yes No NA

Not part of this review level.

E. Background counts for the same duration as the sample runs are submitted and acceptable.

Yes No NA

Not part of this review level.

F. Each standard is measured for peak resolution as full-width at half-maximum height

(FWHM) and absolute counting efficiency and all center column readings (bounds test)
"Pass".

Yes ___ No ___ NA X

Not part of this review level.

G. The MDA was checked for 10% of the samples and is \leq RDL.

Yes X No ___

IV. BLANKS

A. The method blank was analyzed at the required frequency.

Yes X No ___

And the results were within the required control limits. When average blanks or instrument background is subtracted to determine net counts, the net blank must be < 2 sigma uncertainty.

Yes X No ___ NA ___

GEL: All results are reported as ND. No blank corrections are required.

Krypton-85 was reported by the laboratory as "UI" in the method blank due to low abundance. This analyte may suffer from a negative bias. It was not detected in associated samples, and was not flagged in this manner in samples. No qualifiers have been added.

B. Field Blanks are identified and results are below the detection limit or $< 2 \times$ IDL.

Yes ___ No ___ NA X

V. SPIKE SAMPLE RECOVERY

A. A matrix (pre-digestion) spike sample was analyzed for each digestion group and/ or matrix or as required in the SOW.

Yes ___ No X

GEL: No MS was prepared. The laboratory has not commented about the reason.

The spiking of the large sample size (~500g) required for these analyses usually prohibits the spiking of radioactive compounds. The acceptable QC sample for accuracy for this analysis is the Laboratory Control Sample (LCS).

And the Matrix spike percent recoveries were within the required control limits of 75 – 125%

Yes ___ No ___ NA X

VI. DUPLICATES

A. Matrix (pre-digestion) duplicate samples were analyzed at the required frequency.

Yes X No ___

B. And met the Duplicate Error Ratio (DER) criteria calculations which account for the 2 sigma efficiency values. DER limit is 1.0 (the DOE limit is 1.42)

Yes ___ No X

Some analytes did not meet the DER limit, as shown below. These are all non-detected results in both the sample and the duplicate, and no qualifiers are added. Detected targets (Bi-214 and K-40) have acceptable DER levels. K-40 was detected in the duplicate, not in

the parent.

Parent	Parameter	Conc	RL	Counting error	Units	Flag	DER	MDC
16-22B	Ag-110m	1.90	3.82	2.07	pCi/L	U	1.83	3.82
	Ce-139	1.58	4.02	2.27	pCi/L	U	2.32	4.02
	Ce-141	-4.01	6.87	4.71	pCi/L	U	1.78	6.87
	Ce-144	17.4	28.2	16.8	pCi/L	U	1.25	28.2
	Co-60	-0.447	3.76	2.28	pCi/L	U	1.08	3.76
	Cr-51	28.5	39.9	22.2	pCi/L	U	2.31	39.9
	Cs-137	-1.67	3.66	2.31	pCi/L	U	1.31	3.66
	Eu-152	2.90	11.3	7.05	pCi/L	U	1.40	11.3
	Eu-155	9.54	16.3	9.58	pCi/L	U	1.52	16.3
	Iridium-192	-1.5	3.75	2.34	pCi/L	U	1.44	3.75
	Kr-85	-1650	1030	735	pCi/L	U	5.20	1030
	Nb-95	-3.23	4.27	2.89	pCi/L	U	2.30	4.27
	Nd-117	-21	31.3	20.1	pCi/L	U	1.91	31.3
	Pb-210	-634	649	480	pCi/L	U	1.35	649
	Ru-106	-20.4	28.3	18.7	pCi/L	U	2.16	28.3
	Sb-124	-4.26	7.89	5.49	pCi/L	U	1.59	7.89
	Th-234	6.52	239	176	pCi/L	U	1.02	239
	Tl-208	-1.75	4.40	2.84	pCi/L	U	1.72	4.40
	U-235	-19.5	28.6	19.8	pCi/L	U	1.17	28.6
	U-238	6.52	239	176	pCi/L	U	1.02	239
	Zr-95	3.33	7.24	3.97	pCi/L	U	1.32	7.24

C. If suspected "hot particles" were found, were samples re-analyzed.

Yes ___ No X ___

No hot particles found, sample results low or BDL.

VII. LABORATORY CONTROL SAMPLE

A. An LCS was analyzed at the required frequency.

Yes X ___ No ___

The laboratory used a subset of the nuclide target list in the LCS. Am-241, Co-60, and Cs-137 were spiked.

B. The LCS was within a control limit of 80-120% for water and 70 – 130% for soil.

Yes X ___ No ___

C. The LCS uncertainty calculation verifies that the observed value of the LCS is within 3 sigma control limits of the expected LCS value and the relative percent error does not exceed 5 %.

Yes X ___ No ___

VIII. DETECTION LIMITS

A. Detection limits met the method limits.

Yes X ___ No ___

The instrument detection limit was within an isotope-specific limit for the calibration standards and QC samples.

The test for detection of a radionuclide includes two distinct steps, first to evaluate if it is > MDC, then to determine if the sample result is > the TPU. All results in this case are less than the MDC. In cases where the sample result is < the TPU, the result is not considered to be different from zero. If it is above the TPU the result could be high enough to represent detection below the MDC.

Negative results that have absolute values above the TPU could potentially indicate a low bias due to shifting background.

The laboratory has flagged a number of results with “UI” to indicate that they suffer from some type of detection issue. The issues cited by the laboratory are summarized in the table below. These results could potentially suffer from negative bias and are qualified as JQ.

Sample ID	SDG ID	Parameter	Flag	Comments	Qualifier
16-22B	238218	Ac-228	UI	low abundance.	JQ
16-22B	238218	K-40	UI	high counting uncertainty.	JQ
16-22B	238218	Pb-214	UI	low abundance.	JQ
16-22B	238218	Ra-228	UI	low abundance.	JQ
16-22D	238218	Pb-212	UI	No comment	JQ
16-22D	238218	Pb-214	UI	No comment	JQ
16-22D	238218	Th-230	UI	No comment	JQ

B. The energy of the identified peaks are within 2 KeV of the library energy of the radionuclide.

Yes___ No___ NA__X_

No raw data were provided for the GEL samples and results were all non-detect.

C. Decay-corrected results have been reports appropriately for the short half-life results

Yes___ No___ NA__X_

This could not be determined from the data provided from GEL. Past reports have indicated the reporting from GEL of decay corrected results with the following comment: “Decay correction is necessary for short half-life isotopes which are not in equilibrium with the parent isotope, thus the measured radionuclide has decayed to a lower level prior to analysis and would require correction back to collection. However, for virtually all isotopes of interest, the isotopes are in equilibrium and the decay is matched by its production from the parent isotope decay. Thus, decay correction would result in a high biased activity.” In all reported results in past reported provided to the reviewer, the decay correction did not impact the use of the data, nor the accuracy of the reported result. This would be particularly true of the GEL results which are low level and considered to be ‘J’ estimated values.

D. Tentatively Identified Radionuclides (TIR)

TIRs were reported and correctly identified from the library search.

Yes___ No___ N__X_

No TIRs are reported.

IX. PREPARATION AND ANALYSIS LOGS

A. All samples were prepared or analyzed within the required holding times referencing the SOW (time of sample receipt to preparation/distillation).

Yes X No___

B. All samples were analyzed within the EPA Method recommended holding times (time of sample collection to date of analysis).

Yes X No___

No 40 CFR limits exist for radchem, so method limits were referenced. All samples were analyzed within 90 days of collection.

X. CHAINS OF CUSTODY

A. All chains of custody were complete with initials, dates, times and any changes are crossed out with one line and initialed.

Yes X No ___

B. Samples arrived intact, at the proper pH (< 2) and temperature.

Yes X No___

XI. FIELD QC

Field QC samples were identified and have met a guidance limit of CLP 30% for water and 50% for soil, or $\pm 2 \times \text{RL}$ (water) or $3.5 \times \text{RL}$ (soil) for results $< 5 \times \text{RL}$. Or for radiochemistry, the results relative to the 2 sigma counting error (uncertainty) may be used. The difference between the 2 results is compared against the uncertainty for each sample result. DER of > 1 is to be discussed. No qualifiers are applied.

Yes___ No___ NA X

No field duplicates were identified.

XII. OVERALL ASSESSMENT OF THE CASE

The data are considered fully useable for project purposes with consideration of the follow qualification or comments.

Deliverables:

The following is noted:

The GEL Laboratories data package did not include raw data. Only summary QC results were provided. The method used is EPA 901.1

For the GEL data, a Level II review is conducted.

Detection Limits

The laboratory has flagged a number of results with “UI” to indicate that they suffer from some type of detection issue. The issues cited by the laboratory are summarized in the table within the body of this report. These results could potentially suffer from negative bias and are qualified as JQ.

Samp_ID	SDG ID	Lab_ID	Samp_Date	Medium_type	Method_Type	Method_ID	RunNo	Samp_Fraction	IS_FIELD_QC	Field_QC_ID	LAB_NAME	SAMP_ROUND	Ext_Date	ExtractMethod	ANAL_DATE	Parameter	CAS_NO	Conc	RL	IDL	Counting_err	Units	Dilution	QAQC	EPAQual	IS_DETECT	TPU	DER	MDC	Matrix	StdDev	Comments	DVAL
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	ASTM D 5174	1	Total	No	SA	GEL	1009			10/07/2009 01:10 PM	Total Uranium	7440-61-1	0.0175	0.928	0.0161		ug/L	1	U	N	0.0161	0.928	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	DOE EML HASL-300, Tc-02-RC Modified	1	Total	No	SA	GEL	1009			10/13/2009 11:16 AM	Tc-99	14133-76-7	4.47	46.8	27.2		pCi/L	U	N	N	27.2	46.8	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 900.0	1	Total	No	SA	GEL	1009			10/14/2009 12:40 PM	GROSS ALPHA	12587-46-1	26	15.9	11.5		pCi/L	U	N	Y	12.5	15.9	Water					
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 900.0	1	Total	No	SA	GEL	1009			10/14/2009 12:40 PM	GROSS BETA	12587-47-2	11.1	18.3	10.9		pCi/L	U	N	N	11.1	18.3	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Ac-228	14331-83-0	0	17.2	12.1		pCi/L	U	N	N		17.2	Water			Data rejected due to low abundance.	JQ	
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Ag-110m	378784-24-8	-0.728	3.17			pCi/L	U	N	N		3.17	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Am-241	14596-10-2	7.6	23.2			pCi/L	U	N	N		23.2	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Ba-133	13981-41-4	0.881	4.36			pCi/L	U	N	N		4.36	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Ba-140	14798-08-4	0.82	14.3			pCi/L	U	N	N		14.3	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Be-7	13966-02-4	-0.107	28.4			pCi/L	U	N	N		28.4	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Bi-212	14913-49-6	7.16	27.2			pCi/L	U	N	N		27.2	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Bi-214	14733-03-0	19.5	6.38			pCi/L	U	N	Y		6.38	Water					
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Ce-139	13982-30-4	-1.97	3.09			pCi/L	U	N	N		3.09	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Ce-141	13967-74-3	1.36	6.10			pCi/L	U	N	N		6.10	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Ce-144	14762-78-8	3.43	23.8			pCi/L	U	N	N		23.8	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Co-56	14093-03-9	0.18	3.30			pCi/L	U	N	N		3.30	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Co-57	13981-50-5	2.67	3.07			pCi/L	U	N	N		3.07	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Co-58	13981-38-9	-0.88	3.27			pCi/L	U	N	N		3.27	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Co-60	10198-40-0	1.32	3.98			pCi/L	U	N	N		3.98	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Cr-51	14392-02-0	-5.4	30.6			pCi/L	U	N	N		30.6	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Cs-134	13967-70-9	0.565	4.26			pCi/L	U	N	N		4.26	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Cs-136	14234-29-8	-0.589	5.73			pCi/L	U	N	N		5.73	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Cs-137	10045-97-3	0.433	3.67			pCi/L	U	N	N		3.67	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Eu-152	14683-23-9	-3.69	9.75			pCi/L	U	N	N		9.75	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Eu-154	15585-10-1	0.355	10.6			pCi/L	U	N	N		10.6	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Eu-155	14391-16-3	0.0159	13.1			pCi/L	U	N	N		13.1	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Fe-59	14596-12-4	1.38	7.24			pCi/L	U	N	N		7.24	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Hg-203	13982-78-0	-0.682	3.49			pCi/L	U	N	N		3.49	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Iridium-192	14694-69-0	0.73	3.36			pCi/L	U	N	N		3.36	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	K-40	13966-00-2	0	29.6			pCi/L	UI	N	N		29.6	Water			Data rejected due to high counting uncertainty.	JQ	
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Kr-85	13983-27-2	706	797			pCi/L	U	N	N		797	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Mn-54	13966-31-9	-1.93	3.13			pCi/L	U	N	N		3.13	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Na-22	13966-32-0	0.126	3.77			pCi/L	U	N	N		3.77	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Nb-94	14681-63-1	0.473	2.96			pCi/L	U	N	N		2.96	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Nb-95	13967-76-5	0.997	3.75			pCi/L	U	N	N		3.75	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Nd-117	14269-74-0	4.96	29.4			pCi/L	U	N	N		29.4	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Np-239	13968-59-7	5.5	23.2			pCi/L	U	N	N		23.2	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Pb-210	14255-04-0	-1.46	7.22			pCi/L	U	N	N		7.22	Water			Result not detected above the detection limit		
16-22B	238218	238218001	10/01/2009 11:30 AM	WG	RADCHEM	EPA 901.1	1	Total	No	SA	GEL	1009			10/06/2009 10:49 PM	Pb-212	15092-94-1	2.04	6.66			pCi/L	U	N	N		6.66	Water			Result not detected above the detection limit		
16-22B	2																																

