

AUG 28 1995

CAUSE NO. 16264

R. BARTON, CLERK  
 DISTRICT COURT, DUVAL COUNTY TEXAS  
 BY: DEPUTY

MANUEL T. LONGORIA, individually § IN THE DISTRICT COURT  
 and as trustee for MARIA A. §  
 LONGORIA GST EXEMPT TRUST §  
 §  
 VS. § DUVAL COUNTY, TEXAS  
 §  
 URANIUM RESOURCES, INC., §  
 URI, INC., and §  
 WILLIAM M. MCKNIGHT, SR. § 229TH JUDICIAL DISTRICT

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID JUDGE:

MANUEL T. LONGORIA, individually and as trustee for MARIA A. LONGORIA GST EXEMPT TRUST, files his Original Petition complaining of URANIUM RESOURCES, INC., URI, INC., and WILLIAM M. MCKNIGHT, and would show the Court as follows:

## I.

MANUEL T. LONGORIA, (hereinafter referred to as "Plaintiff), is a natural person residing at 1408 Mier, Laredo, Webb County, Texas 78040. He is the sole Trustee for the MARIA A. LONGORIA GST EXEMPT TRUST. Said Plaintiff owns the property , both individually and as Trustee, made subject to this suit.

Defendant URANIUM RESOURCES, INC., is a Delaware corporation with its principal place of business in Dallas, Dallas County, Texas. URANIUM RESOURCES, INC. may be served with process through Thomas Ehrlich, 12750 Merit Drive, Suite 1210, Lock Box 12, Dallas, Dallas County, Texas 75251.

Defendant URI, INC., is a Delaware corporation with its principal place in Dallas, Dallas County, Texas. URI, INC. is a wholly-owned subsidiary of URANIUM RESOURCES, INC. URI, INC. may



also be served with process through Thomas Ehrlich, 12750 Merit Drive, Suite 1210, Lock Box 12, Dallas, Dallas County, Texas 75251.

Defendant, WILLIAM M. MCKNIGHT, SR., is a natural person, resident of Nueces County, Texas, who may be served with process at URI, INC., 5656 South Staples, Suite 250, LB 8, Corpus Christi, Texas 78411.

## II.

Venue is proper in Duval County pursuant to Tex. Civ. Prac & Rem. Code § 15.001 because all or part of Plaintiff's causes of action accrued in Duval County.

## III.

Defendants, URANIUM RESOURCES, INC. and URI, INC., for many years engaged in uranium mining and processing operations on ranch property owned by Plaintiff, pursuant to a mineral lease with Plaintiff, as well as on property immediately adjacent to Plaintiff's land. As a result of these uranium mining and processing operations, URANIUM RESOURCES, INC. and URI, INC., have, on many occasions, released toxic chemicals and/or radioactive materials onto Plaintiff's land polluting the soil, aquifer, and vegetation of Plaintiff's Ranch, in violation of Texas law and said Defendants' contractual obligations to Plaintiff.

## IV.

Plaintiff would further aver that Defendant WILLIAM R. MCKNIGHT in the events giving rise to this suit, is a person who had supervisory and management authority over the uranium

operations in question, including such a degree of control that would have enabled him, in the exercise of ordinary care, to properly protect the Plaintiff from the injuries and damages suffered by Plaintiff in the events giving rise to this suit.

Plaintiff would assert and allege that the cause or causes of action herein arose from or are connected with purposeful acts committed by said Defendant.

v.

Plaintiff MANUEL T. LONGORIA is the owner and trustee of the property which is the subject of this suit. The property is a ranch located in Duval and Webb Counties. In the late 1970's Plaintiff leased the rights to mine for uranium on portions of his Ranch to Defendants, URANIUM RESOURCES, INC., AND URI, INC., who thereafter engaged in uranium mining and processing operation on Plaintiff's land at all times relevant herein. During the course of said Defendants' Uranium mining and processing operations on Plaintiff's Ranch, and on adjacent land, Defendants URANIUM RESOURCES, INC. and URI, INC. (hereinafter collectively referred to as "URI"), wrongfully discharged excessive and hazardous materials onto Plaintiff's property, contaminating the soils, aquifer, and vegetation on his Ranch, and creating a serious health hazard thereon. Despite the Defendants' knowledge that URI's activities were contaminating Plaintiff's property, they completely failed to inform Plaintiff of the pollution, and instead constantly assured him that URI's activities were doing no harm. Plaintiff did not learn of the pollution and contamination of his property until only

recently. The contamination has damaged the value of the property, preventing Plaintiff's use and enjoyment of the property, and has become a substantial toxic health hazard.

VI.

URI's Uranium mining and processing operations on Plaintiff's Ranch (hereinafter referred to as the "Longoria Ranch"), and the adjacent property, first began in 1979. URI mined the Uranium through in-situ solution mining, a process which contaminated the soil, aquifer, and vegetation on Plaintiff's land with toxic materials and hazardous waste.

VII.

URI also discharged massive amounts of wastewater into the Arroyo de los Angeles in its uranium mining and processing operations, both on the Longoria Ranch and on adjacent property, including discharging directly into an extremely rare and attractive natural spring fed pool in the Arroyo that was used for swimming and fishing. As a result, portions of property owned by Plaintiff, including the Arroyo spring, and the Arroyo meadows, is contaminated with hazardous materials and hazardous waste.

VIII.

Defendant MCKNIGHT represented to Plaintiffs that the discharge onto the Arroyo de Los Angeles from URI's mining operations would consist of water cleaner than typical City drinking water, and convinced Plaintiff to allow for such discharge, when said Defendant knew that in fact the Arroyo would be contaminated with massive amounts of wastewater laden with

hazardous materials.

IX.

The Arroyo de los Angeles on the Longoria Ranch property in Duval County is now polluted with dangerous chemicals. These chemicals were deposited by discharges onto the Arroyo. Such contamination was caused by URI and has damaged the value of Plaintiff's property, prevented use of the property, and has created a serious health hazard which has resulted in the need for extensive remediation of the affected soil, aquifer, and vegetation.

X.

Other property on the Longoria Ranch, including the uranium mine fields operated by URI, and property on which URI's uranium processing facilities were located, were contaminated with hazardous materials and dangerous chemicals as a result of the uranium mining activities of URI. Such contamination was caused by URI and has damaged the value and use of Plaintiff's property, and has created a serious health hazard which has resulted in the need for extensive remediation of the affected soil, aquifer, and vegetation.

XI.

Following the cessation of its solution mining operations at the Longoria Ranch, URI was asked by the State to clean-up its pollution. Plaintiff subsequently also requested of URI that it remediate the property. URI has failed to comply.

XII.  
NEGLIGENCE  
AND GROSS NEGLIGENCE

Defendants owed a duty of reasonable care to Plaintiff to ensure that its activities on Plaintiff's property did not injure or damage Plaintiff. Defendants breached this duty of care through acts and omissions including but not limited to:

1. Failing to adequately and safely conduct mining operations;
2. Failing to adequately and safely conduct uranium processing operations;
3. Failing to adequately and properly conduct mining restoration activities;
4. Failing to dispose of wastewater in an adequate and proper manner;
5. Failing to choose a safe and adequate location for its wastewater discharge;
6. Failing to conduct accurate, timely and frequent testing of chemicals in its wastewater stream;
7. Failing to conduct accurate, timely and frequent testing of chemicals in the soil at its wastewater discharge locations;
8. Failing to properly investigate and take appropriate action when notified of contamination by the State;
9. Misinforming the Plaintiff and the public of the scope and nature of contamination on the Longoria Ranch;
10. Failing to take timely and appropriate actions to clean-up the contamination on the Longoria Ranch;
11. Failing to comply with the State of Texas regulations regarding limits for chemical contamination of soil and water;
12. Failing to comply with State of Texas regulations regarding the frequency of testing for chemicals in its wastestream, and in the soil;
13. Failing to take adequate corrective measures when it

knew or should have known that its activities were polluting and contaminating Plaintiff's property;

14. Failing to warn Plaintiff of the potential contamination of his property;
15. Failing to notify Plaintiff of the contamination of his property.

Defendants' negligent acts and omissions were and are a proximate cause of injuries and damages to Plaintiff.

**XIII.**  
**NEGLIGENCE PER SE**

URI's wastewater disposal caused contamination and pollution of Plaintiff's property in excess of the pollution threshold limits defined in Texas law.

**XIV.**  
**BREACH OF CONTRACT**

Plaintiff entered into a Uranium mining lease with R.L. Burns Corp. on August 10, 1977. This lease was subsequently assigned by R.L. Burns Corp. to URI. URI breached the lease through its improper, inadequate, and unsafe conduct in its uranium mining and processing operations, including the disposal of polluted wastewater onto the Longoria Ranch which contaminated Plaintiff's soil, aquifer, and vegetation with toxic and radioactive materials, and other unsafe uranium mining and processing activities, all of which contaminated Plaintiff's land; and further breached the lease in failing to remediate Plaintiff's contaminated land to its original condition. Furthermore, URI has failed to pay any compensation whatsoever to Plaintiff for the damage to his property. URI's breaches of its agreements with Plaintiff have

damaged and injured Plaintiff beyond the jurisdictional limits of the Court.

**XV.**  
**FRAUD**

Prior to entering into the original Uranium lease with Plaintiff, as well as the subsequent wastewater pipeline easement agreement, URI and MCKNIGHT made false material representations to Plaintiff regarding the environmental impact of URI's operations on Plaintiff's property. URI and MCKNIGHT told Plaintiff that its operations were clean, safe, and well-regulated and would not affect Plaintiff's property or its value. When URI and MCKNIGHT made these representations, they knew they were false, or in the alternative, made them recklessly without any knowledge of their truth as a positive assertion. URI and MCKNIGHT made false representations with the full intent that Plaintiff rely upon them in order to encourage Plaintiff to enter into a Uranium mining lease with URI and to allow URI and MCKNIGHT to discharge wastewater into the Arroyo de Los Angeles. Based upon URI's and MCKNIGHT'S representations that its activities would not contaminate or pollute his land, Plaintiff entered into the lease with URI and allowed the discharge of waste water into the Arroyo, through a pipeline easement, and has thereby suffered substantial and severe injuries and damages.

**XVI.**  
**NUISANCE**

URI's pollution and contamination of the soil, aquifer, and vegetation of Plaintiff's ranch has unreasonably interfered with

Plaintiff's use and enjoyment of his land. URI's conduct was a result of its intentional or negligent wrongdoing. Such wrongdoing as plead elsewhere in this petition is incorporated into this section by reference. URI's interference with Plaintiff's use and enjoyment of his land has caused Plaintiff significant and substantial harm.

XVII.  
TRESPASS

URI's dumping of toxic and radioactive materials on Plaintiff's property through its wastewater discharge constituted an unauthorized physical entry on the property. It was URI's full intention to dispose of the wastewater on Plaintiff's property, and such disposal was done voluntarily. As a result of the unauthorized entry of URI's toxic materials on his ranch, Plaintiff has suffered significant and substantial injuries and damages.

XVIII.  
INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS

URI's pollution of Plaintiff's property, its efforts to conceal the contamination from Plaintiff, and its attempt to abandon the contaminated area prior to clean-up demonstrate extreme and outrageous conduct by URI. Such conduct was undertaken intentionally or recklessly by URI, and caused Plaintiff to suffer severe emotional distress as a result.

XIX.  
DAMAGES

As a direct and proximate cause of URI's wrongful acts and omissions, Plaintiff has been severely injured and damaged. Such

injuries and damages include the following:

1. Personal discomfort, annoyance, and inconvenience for damage to Plaintiff's ranch property;
2. Loss of the productivity of Plaintiff's ranch property;
3. Loss of the use of Plaintiff's property;
4. Loss of the value of Plaintiff's property;
5. Lost rental value of the property;
6. Loss in the value of Plaintiff's livestock;
7. Cost of restoring the Ranch to the condition it was in prior to Defendant's activities, including restoring the soil, aquifer, and vegetation to its prior condition;
8. Damage to the property, to the underground aquifers, and injury to vegetation by past and future restoration activities;

The Plaintiff's injuries and damages are in an amount greatly in excess of the minimum jurisdictional requirements of this Court.

Plaintiff also requests that the Court require URI to specifically perform its obligations with Plaintiff, and with the State of Texas, to restore the land, including, without limitation, the soil, aquifer, and vegetation Defendants contaminated to the condition it was in prior to URI's mining activities.

XX.  
PUNITIVE DAMAGES

Defendants' conduct that resulted in the pollution and contamination of Plaintiff's property was fraudulent, malicious, and grossly negligent. It further demonstrated conscious indifference to the rights and welfare of the Plaintiff. Plaintiff is entitled to punitive damages because Defendants intentionally made false statements to Plaintiff concerning the environmental

effect of URI's mining and restoration activities. Defendants knew of the falsity of its statements and made them intentionally to deceive Plaintiff or with heedless and reckless disregard of the consequences of their statements.

Plaintiff is further entitled to punitive damages because Defendants' conduct demonstrates malice. Defendants polluted and contaminated the Longoria Ranch, concealed the degree of contamination from Plaintiff, and attempted to deceitfully claim that there was no contamination. Defendants carried out these acts with flagrant disregard for the rights of Plaintiff and with actual awareness that their acts would in reasonable probability result in damage to Plaintiff's property.

Plaintiff is also entitled to punitive damages because of Defendants' gross negligence. Defendants' conduct that resulted in the pollution and contamination of Plaintiff's property demonstrated such an entire want of care that it reflects a conscious indifference to the rights, and welfare of Plaintiff. Defendant's activities on the ranch involved an extreme degree of risk of harm to the Plaintiff. Defendants knew of the risk involved, but nevertheless proceeded with its wrongful activities with conscious indifference to the rights, safety, and welfare of Plaintiff.

**XXI.**  
DISCOVERY RULE

The Discovery Rule applies to this matter. No limitation begins to run until Plaintiff learned of, or in the exercise of reasonable diligence, should have learned of Defendants' misconduct

herein complained of. Plaintiff brought suit promptly after learning of the existence of facts constituting the causes of action herein pleaded. Any suggestions that in the exercise of reasonable diligence that Plaintiff should have discovered Defendants' misconduct earlier in incorrect. Accordingly, the defenses of limitations, latches, estoppel or ratification do not apply.

**XXII.**  
**ATTORNEY'S FEES**

Because of Defendant's wrongful acts and omissions, Plaintiff has had to hire the below signed attorneys to prosecute this suit on his behalf. Plaintiff thereby will incur liability for the usual, customary and reasonable fees for the attorneys' services in the prosecution of the claim. If Plaintiff is successful in the prosecution of his Breach of Contract and Punitive Damages claims, he is entitled to recover the reasonable and necessary attorneys' fees he has incurred.

**XXII.**  
**PRAYER**

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that Defendants be cited to answer and appear herein and that, upon final trial hereof, Plaintiff recover judgment against Defendants for damages, exemplary damages, costs, pre-judgment interest, post-judgment interest, attorneys fees, and all such other and further relief at law and equity to which they may show themselves justly entitled.

Respectfully Submitted,

Ricardo de Anda  
Laura L. Gomez  
**DE ANDA LAW FIRM**  
Plaza de San Agustin  
212 Flores Avenue  
Laredo, Texas 78040  
Tel. (210) 726-0038  
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Fax. (713) 623-8724

By: Ricardo de Anda  
Ricardo de Anda  
State Bar No. 056895000

Attorneys for Plaintiff

**PLAINTIFF REQUESTS TRIAL BY JURY.**

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212 Flores Avenue  
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April 4, 1997

Mr. Dale P. Kohler, Leader  
Inspection and Compliance Team  
UIC, Uranium, and Radioactive Waste Section  
TNRCC  
P O Box 13087  
Austin, Texas 78711-3087

RE: Permit #I989

Dear Mr. Kohler:

As you may recall, I represent Mr. Manuel Longoria, the owner of the property subject to the above Permit issued by your office.

In response to URI's request that the property be released from URI's Permit requirements, URI took samples of soil from the Arroyo de Los Angeles in November, and again in December of 1996, to determine the extent of uranium contamination of the Arroyo caused by its long-standing discharge of contaminated wastewater into the Arroyo on the Longoria Ranch. URI had the samples analyzed by Jordan Labs. We took split samples of the December soil retrievals and had them analyzed by Teledyne labs. I take it that URI has forwarded you copies of Jordan's lab analysis. I am enclosing herewith copies of Teledyne's lab analysis.

I have attached hereto two tables setting out the more relevant data regarding the lab results. On Table 1, I have compared URI's results from the November 1996 retrievals, with the results which they obtained from an analysis which they undertook in 1994. I believe you have a copy of the 1994 results. On Table 2, I have compared URI's results from the December 1996 retrievals as reported by Jordan Labs, with our split sample results as reported by Teledyne Labs.

It is evident from Table 1 that of the 20 samples taken downstream from the discharge point, 19 of the samples exhibit uranium contamination substantially above background levels, and 8 of the samples indicate contamination above the State's limits for releasing a permittee from its obligations. Moreover, 14 of the 20 samples taken in November of 1996 exhibited an increase in

Mr. Dale P. Kohler  
April 4, 1997  
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levels of contamination from URI's 1994 tests. For example, several locations that were below legal limits in 1994 rose to above legal limits in November of 1996. Indeed, Table I shows that uranium is moving after each rainstorm, and that levels that are decontaminated today will likely become recontaminated later, unless extensive decontamination is undertaken to remove all vestiges of uranium above background.

While Table I shows that measurements upstream, at the boundary of the Longoria-Cogema leased property, are below the legal limit, uranium concentrations are four times above background. Moreover, the uranium concentrations recorded from the November 1996 retrievals are above those measured in 1994, and indicate uranium is moving downstream from the URI discharge point on property owned by Servando Benavides. This shows that uranium from the URI/Benavides discharge point has not only contaminated the Cogema leased stretch of the Arroyo, but is also moving onto the Longoria Ranch. URI should thus not be relieved of its permit obligations until the Longoria property is completely remediated, and until leakage from the URI/Benavides discharge point and the Cogema leased property is resolved as well.

While Table I shows that uranium concentrations further down the Arroyo on Longoria property are not above legal limits, they are still significantly above background levels, and there is no question uranium has moved more than 3/5 of a mile downstream to the border of the Longoria property, and undoubtedly onto neighboring properties.

Finally, we are concerned with the understated results reported by URI, when compared with our split sample report from Teledyne labs. URI soil concentration of uranium results reported by Jordan Labs are consistently lower when compared to the Teledyne Lab results, as shown on table 2. This is probably explained by the fact that the laboratory methods of measurement are different. Teledyne uses a more precise method, dissolving the uranium in acid first. We believe that this suggests that most of the URI samples reported on Table I as being below legal limits, are understated, and should be considered as being in fact above limits.

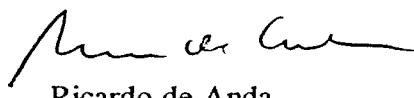
We submit that the whole stretch of the Arroyo from the URI/Benavides discharge point until it leaves the Longoria Ranch needs to be decontaminated before URI is discharged from its permit obligations. Moreover, we have concern about URI's proposed method for remediation. URI wishes to simply remove contaminated soil. We fear that unless your office directs an independent monitoring of the work, URI could simply mix surface uranium where concentrations are higher in with deeper arroyo soils so that the resultant concentrations are below regulatory limits without actually moving uranium out of the arroyo. This is hardly remediation. A remediation plan should be required of URI which is designed to effectively and permanently decontaminate the Arroyo, and safely dispose of the contaminated soils in a validated manner.

Mr. Dale P. Kohler  
April 4, 1997  
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Please advise as to your response to this letter before you take action on URI's request for release from its permit obligations, specifically providing us with any proposed remediation plan, so that we may be provided with an opportunity to comment on how you intend to provide for the required remediation.

Thank you.

Sincerely yours,



Ricardo de Anda

RDA/lbv

**ARR YO DE LOS ANGELES SOIL**  
**TABLE 1. URI ANALYSIS COMPARISON**

**NATURAL U (PPM AVERAGES)**

URI '94		URI '96	
Location		Location	
LG100	0.93		1
LG200	0.93		1
LG300	0.93		1.2
LG400	1		1.2
LG500	1.1		1
LCK0	38	LCK50	24
LCK100	16	LCK150	71
LCK200	34	LCK250	47
LCK300	14	LCK350	7.6
LCK400	30	LCK450	48
LCK500	35	LCK550	54
LCK600	33	LCK650	100
LCK700	53	LCK750	36
LCK800	20	LCK850	24
LCK900	34	LCK950	39
LCK1000	34	LCK1050	58
LCK1100	43	LCK1150	40
LCK1200	25	LCK1250	18
LCK1300	12	LCK1350	14
LCK1400	37	LCK1450	70
LCK1500	37	LCK1550	47
LCK1600	27	LCK1650	27
LCK1700	11	LCK1750	12
LCK1800	10	LCK1850	25
LCK1900	10	LCK1950	20
LCK2000	20	LCK2050	17

Note: URI '96 samples taken November 19, 1996, at LCK 50, 150, 250, etc., while URI '94 samples taken at LCK0, 100, 200, etc. URI '94 results were apparently taken 75' beyond the LCK designation.

**ARROYO DE LOS ANGELES SOIL**  
**TABLE 2. TOTAL TELEDYNE V. URI**

MAXIMUM			AVERAGE	
Location	Teledyne	URI	Teledyne	URI
LCK 50	100	66	27.5	20.68
LCK 650	69	64	41.2	35.8
LCK 1550	48	44	17.54	22.82
LCK 2850	19	20	8.46	9.94
LG 50	1.5	1	1.28	0.82
LG 150	1.3	1	1.14	0.896
LG 550	1.5	1.2	.24	0.936

Note: URI, Teledyne split samples taken Dec. 3, 1996. "Average" designations include an average compilation of the 5 samples taken across the Arroyo at the designated points. "Maximum" designations include the maximum determination found between the 5 samples taken across the designated points.

## TELEDYNE BROWN ENGINEERING ENVIRONMENTAL SERVICES

## REPORT OF ANALYSIS

REF ID: A65433  
JAN 6 1997  
RUN DATE 01/21/97

WORK ORDER NUMBER

3-1784

CUSTOMER P.O. NUMBER

12/05/96

DATE RECEIVED

01/08/97

PAGE 1

MR RICARDO DE ANDA  
DE ANDA LAW FIRM  
PLAZA DE SAN AGUSTIN  
212 FLORES AVENUE  
LAREDO TX 78040

## S O I L

TELEDYNE SAMPLE NUMBER	CUSTOME'R'S IDENTIFICATION	STA NUM	COLLECTION-DATE			ACTIVITY (PCU/GM DRY)	NUCL-UNIT-% U/M	MID-COUNT TIME DATE	VOLUME - UNITS ASH-WGHT-%	LAB.
			START DATE	STOP TIME	DATE					
32271	LCK-50 A 0-6	12/03				PREP TOTAL-U	DISSO LVED E 02	PPM	*	3
			L.T.	7.	E-01					3
			U-235							4
			TH-234	3.6	+-0.4	E 01				4
			PB-214	2.8	+-0.3	E 01				4
			8I-214	2.6	+-0.3	E 01				4
			AC-228	L.T.	4.	E-01				4
			PB-212	2.						4
			TL-208	L.T.	1.	E-01				4
			K-40	5.1	+-0.9	E 00				4
			CS-137	1.3	+-0.6	E-01				4
32272	LCK-50 A 6-12	12/03				PREP TOTAL-U	DISSO LVED E 00	PPM	*	3
			U-235	6.4	+-1.0	E 00				3
			TH-234	L.T.	2.	E-01				4
			PB-214	3.1	+-0.6	E 00				4
			BI-214	1.2	+-0.1	E 00				4
			AC-228	1.1	+-0.1	E 00				4
			PB-212	L.T.	2.	E-01				4
			TL-208	3.0	+-0.4	E-01				4
			K-40	1.3	+-0.3	E-01				4
			CS-137	5.7	+-0.6	E 00				4
				8.7	+-3.0	E-02				4
32273	LCK-50 B 0-6	12/03				PREP TOTAL-U	DISSO LVED E 01	PPM	*	3
			U-235	2.5	+-0.4	E 01				3
			TH-234	L.T.	5.	E-01				4
			PB-214	8.5	+-0.9	E 00				4
			BI-214	8.6	+-0.9	E 00				4
			AC-228	8.3	+-0.8	E 00				4
			PB-212	L.T.	3.	E-01				4
				5.2	+-0.7	E-01				4

TELEDYNE BROWN ENGINEERING ENVIRONMENTAL SERVICES

## REPORT OF ANALYSIS

RUN DATE 01/21/97

WORK ORDER NUMBER

3-1784

12/05/91

L6/80/10

MR RICARDO DE ANDA  
DE ANDA LAW FIRM  
PLAZA DE SAN AGUSTIN  
212 FLORES AVENUE  
LAREDO TX 78040

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TELEDYNE SAMPLE NUMBER	CUSTOMER'S IDENTIFICATION	STA NUM	COLLECTION-DATE			ACTIVITY (PCU/G DRY)	NUCL-UNIT-% U/M *	TIME DATE TIME	MID-COUNT	VOLUME - UNITS	ASH-WEIGHT-% *	LAB.
			START DATE	STOP DATE	TIME							
32273	LCK-50 B 0-6		12/03			TL-208 L-40 CS-137	1.5 8.0 2.0	+0.5 E-01 +0.8 E-00 +0.4 E-01	01/10 01/10 01/10	4	4	
32274	LCK-50 C 0-6		12/03			PREP TOTAL-U U-235 TH-234 PB-214 SI-214 AC-228 PB-212 TL-208 K-40 CS-137	2.3 L.T. L.T. 5.6 4.9 2.3 2.4 1.1 6.2 9.1	+~0.3 E 00 E-01 E-01 +~0.7 E-01 +~0.7 E-01 +~1.1 E-01 +~0.4 E-01 +~0.3 E-01 +~0.6 E 00 +~3.1 E-02	PPM * * 01/10 01/10 01/10 01/10 01/10 01/10 01/10 01/10 01/10	3 3 3 4 4 4 4 4 4 4 4 4	3	3
32275	LCK-50 D 0-6		12/03			PREP TOTAL-U U-235 TH-234 PB-214 SI-214 AC-228 AC-228 PB-212 TL-208 K-40 CS-137	8.5 L.T. L.T. 9.3 8.8 L.T. L.T. 2.8 9.5 6.9 1.9	+~1.3 E 00 E-01 E-01 E-01 +~0.9 E-01 +~0.9 E-01 1. E-01 +~0.3 E-01 +~2.1 E-02 +~0.7 E 00 +~0.3 E-01	PPM * * 01/14 01/14 01/14 01/14 01/14 01/14 01/14 01/14 01/14 01/14	3 3 3 4 4 4 4 4 4 4 4	3	3

## TELEDYNE BROWN ENGINEERING ENVIRONMENTAL SERVICES

## REPORT OF ANALYSIS

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DATE RECEIVED

01/08/97

PAGE 3

MR RICARDO DE ANDA  
 DE ANDA LAW FIRM  
 PLAZA DE SAN AGUSTIN  
 212 FLORES AVENUE  
 LAREDO TX  
 78040

## S O I L

TELEDYNE SAMPLE NUMBER	CUSTOMER'S IDENTIFICATION	STA NUM	COLLECTION-DATE			ACTIVITY (PCU/GM DRY)	NUCL-UNIT-% U/H *	MID-COUNT TIME DATE	VOLUME - UNITS ASH-WGHT-% *	LAB.
			START DATE	STOP TIME	DATE					
32276	LCK-50 E 0-6	12/03				PREP TOTAL-U	DISO LVED 1.7 +/- 0.3 E 00	PPM	*	3
						U-235	L.T. 2.0 E-01		01/10	3
						TH-234	7.2 +/- 3.3 E-01		01/10	4
						PB-214	7.2 +/- 0.7 E-01		01/10	4
						BI-214	6.8 +/- 0.7 E-01		01/10	4
						AC-228	3.4 +/- 0.9 E-01		01/10	4
						PB-212	3.7 +/- 0.4 E-01		01/10	4
						TL-208	1.3 +/- 0.2 E-01		01/10	4
						K-40	6.8 +/- 0.7 E 00		01/10	4
						CS-137	1.1 +/- 0.3 E-01		01/10	4
32277	LCK-650 A 0-6	12/03				PREP TOTAL-U	DISO LVED 6.9 +/- 1.0 E 01	PPM	*	3
						U-235	1.4 +/- 0.3 E 00		01/14	4
						TH-234	2.8 +/- 0.3 E 01		01/14	4
						PB-214	5.7 +/- 1.0 E-01		01/14	4
						BI-214	4.1 +/- 0.9 E-01		01/14	4
						AC-228	2.0 E-01		01/14	4
						PB-212	3.1 +/- 0.6 E-01		01/14	4
						TL-208	1.2 +/- 0.4 E-01		01/14	4
						K-40	5.0 +/- 0.7 E 00		01/14	4
						CS-137	3.3 +/- 0.5 E-01		01/14	4
32278	LCK-650 A 6-12	12/03				PREP TOTAL-U	DISO LVED 4.4 +/- 0.7 E 00	PPM	*	3
						U-235	L.T. 3.0 E-01		01/14	4
						TH-234	2.0 +/- 0.6 E 00		01/14	4
						PB-214	6.9 +/- 0.8 E-01		01/14	4
						BI-214	6.0 +/- 0.8 E-01		01/14	4
						AC-228	4.3 +/- 1.1 E-01		01/14	4
						PB-212	5.1 +/- 0.6 E-01		01/14	4

## TELEDYNE BROWN ENGINEERING ENVIRONMENTAL SERVICES

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MR RICARDO DE ANDA  
DE ANDA LAW FIRM  
PLAZA DE SAN AGUSTIN  
212 FLORES AVENUE  
LAREDO TX 78040

78040

## S O I L

TELEDYNE SAMPLE NUMBER	CUSTOMER'S IDENTIFICATION	STA NU	COLLECTION-DATE		ACTIVITY (PCI/GM DRY)	NUCL-UNIT-% U/M	TIME DATE	TIME DATE	VOLUME - UNITS	ASH-WGHT-%	LAB.
			START DATE	STOP DATE							
32279	LCK-650 B 0-6	12/03	TL-208 K-40 CS-137	1.8 9.3 6.2	+0.3 +0.9 +2.8	E-01 E-00 E-02	01/14 01/14 01/14	01/14 01/14 01/14	3	3	3
			PREP	DISSO LVED			*				
	TOTAL-U	2.2	+0.3	E-01	PPM						
	U-235	L.T.	6.	E-01			01/14				
	TH-234	1.3	+0.2	E-01			01/14				
	PB-214	6.1	+1.3	E-01			01/14				
	BT-214	5.7	+1.1	E-01			01/14				
	AC-228	L.T.	3.	E-01			01/14				
	PB-212	3.0	+0.7	E-01			01/14				
	TL-208	7.7	+4.3	E-02			01/14				
	K-40	4.2	+0.7	E-00			01/14				
	CS-137	3.0	+0.6	E-01			01/14				
32280	LCK-650 C 0-6	12/03	PREP	DISSO LVED			*				
	TOTAL-U	1.5	+0.2	E-01	PPM						
	U-235	L.T.	3.	E-01			01/10				
	TH-234	7.4	+0.7	E-00			01/10				
	PB-214	4.3	+0.7	E-01			01/10				
	BT-214	4.5	+0.7	E-01			01/10				
	AC-228	L.T.	2.	E-01			01/10				
	PB-212	3.6	+0.4	E-01			01/10				
	TL-208	1.1	+0.4	E-01			01/10				
	K-40	7.8	+0.8	E-00			01/10				
	CS-137	1.8	+0.4	E-01			01/10				

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212 FLORES AVENUE  
LAREDO TX 78040

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TELEDYNE SAMPLE NUMBER	CUSTOMER'S IDENTIFICATION	STA NUM	COLLECTION-DATE START STOP TIME	ACTIVITY NUCL-UNIT-%	MID-COUNT TIME	VOLUME - UNITS
32281	LCK-650 D 0-6	12/03	PREP TOTAL-U	DISO LVED 7.1 + -1.1 E 01 PPM	*	LAB.
			U-235	1.5 + -0.2 E 00	01/14	
			TH-234	3.1 + -0.3 E 01	01/14	
			PB-214	5.5 + -0.8 E-01	01/14	
			BI-214	4.2 + -0.7 E-01	01/14	
			AC-228	L.T. 2. E-01	01/14	
			PB-212	2.9 + -0.6 E-01	01/14	
			TL-208	7.7 + -2.9 E-02	01/14	
			K-40	2.5 + -0.4 E 00	01/14	
			CS-137	1.2 + -0.4 E-01	01/14	

TELEDYNE SAMPLE NUMBER	CUSTOMER'S IDENTIFICATION	STA NUM	COLLECTION-DATE START STOP TIME	ACTIVITY NUCL-UNIT-%	MID-COUNT TIME	VOLUME - UNITS
32282	LCK-650 E 0-6	12/03	PREP TOTAL-U	DISO LVED 2.9 + -0.4 E 01 PPM	*	LAB.
			U-235	5.2 + -2.4 E-01	01/14	
			TH-234	1.2 + -0.1 E 01	01/14	
			PB-214	3.0 + -0.8 E-01	01/14	
			BI-214	4.3 + -0.8 E-01	01/14	
			AC-228	L.T. 2. E-01	01/14	
			PB-212	3.3 + -0.5 E-01	01/14	
			TL-208	1.1 + -0.4 E-01	01/14	
			K-40	4.4 + -0.5 E 00	01/14	
			CS-137	1.8 + -0.4 E-01	01/14	

TELEDYNE SAMPLE NUMBER	CUSTOMER'S IDENTIFICATION	STA NUM	COLLECTION-DATE START STOP TIME	ACTIVITY NUCL-UNIT-%	MID-COUNT TIME	VOLUME - UNITS
32283	LCK-1550 A 0-6	12/03	PREP TOTAL-U	DISO LVED 4.8 + -0.7 E 01 PPM	*	LAB.
			U-235	7.9 + -1.8 E-01	01/14	
			TH-234	1.8 + -0.2 E 01	01/14	
			PB-214	8.3 + -0.8 E-01	01/14	
			BI-214	6.6 + -0.7 E-01	01/14	
			AC-228	6.2 + -1.0 E-01	01/14	
			PB-212	7.5 + -0.8 E-01	01/14	

## TELEDYNE BROWN ENGINEERING ENVIRONMENTAL SERVICES

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PLAZA DE SAN AGUSTIN  
212 FLORES AVENUE  
LAREDO TX  
78040

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TELEDYNE SAMPLE NUMBER	CUSTOME'R'S IDENTIFICATION	STA NUM	COLLECTION-DATE			ACTIVITY (PCU/GM DRY)	NUCL-UNIT-X	TIME DATE	TIME DATE	VOLUME - ASH-WGHT-X	UNITS LAB.
			START DATE	TIME	DATE						
32283	LCK-1550 A 0-6	12/03	TL-208	2.8	+0.3	E-01	01/14	4	4	4	4
			K-40	1.3	+0.1	E-01	01/14	4	4	4	4
			CS-137	L.T.	4.	E-02	01/14	4	4	4	4
32284	LCK-1550 A 6-12	12/03	PREP	DISO LVED			*	3	3	3	3
			TOTAL-U	1.8	+0.3	E-01	PPM	*	3	3	3
			U-235	5.8	+2.0	E-01		01/14	4	4	4
			TH-234	1.1	+0.1	E-01		01/14	4	4	4
			PB-214	6.5	+0.7	E-01		01/14	4	4	4
			BT-214	6.7	+0.7	E-01		01/14	4	4	4
			AC-228	5.3	+0.9	E-01		01/14	4	4	4
			PB-212	5.7	+0.6	E-01		01/14	4	4	4
			TL-208	2.4	+0.3	E-01		01/14	4	4	4
			K-40	1.0	+0.1	E-01		01/14	4	4	4
			CS-137	L.T.	3.	E-02		01/14	4	4	4
32285	LCK-1550 B 0-6	12/03	PREP	DISO LVED			*	3	3	3	3
			TOTAL-U	9.3	+1.4	E-00	PPM	*	3	3	3
			U-235	2.8	+1.4	E-01		01/10	4	4	4
			TH-234	5.0	+0.6	E-00		01/10	4	4	4
			PB-214	4.1	+0.6	E-01		01/10	4	4	4
			B-214	4.0	+0.6	E-01		01/10	4	4	4
			AC-228	3.0	+0.9	E-01		01/10	4	4	4
			PB-212	3.0	+0.4	E-01		01/10	4	4	4
			TL-208	1.2	+0.3	E-01		01/10	4	4	4
			K-40	8.2	+0.8	E-00		01/10	4	4	4
			CS-137	2.6	+0.4	E-01		01/10	4	4	4

## TELEDYNE BROWN ENGINEERING ENVIRONMENTAL SERVICES

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DE ANDA LAW FIRM  
PLAZA DE SAN AGUSTIN  
212 FLORES AVENUE  
LAREDO TX 78040

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TELEDYNE SAMPLE NUMBER	CUSTOMER'S IDENTIFICATION	STA NUM	COLLECTION-DATE			ACTIVITY (PCI/GM DRY)	NUCL-UNIT-% U/M *	MID-COUNT TIME DATE	VOLUME - UNITS ASH-WGHT-% *	LAB.
			START DATE	STOP TIME	DATE					
32286	LCK-1550 C 0-6	12/03				PREP TOTAL-U	DISSO LVED 1.4 +0.2 E 01	PPM	*	3
						U-235	9.1 +1.7 E-01		01/10	3
						TH-234	1.3 +0.1 E 01		01/10	4
						PB-214	6.3 +0.6 E-01		01/10	4
						BI-214	5.9 +0.6 E-01		01/10	4
						AC-228	5.0 +0.9 E-01		01/10	4
						PB-212	7.0 +0.7 E-01		01/10	4
						TL-208	2.3 +0.3 E-01		01/10	4
						K-40	1.0 +0.1 E 01		01/10	4
						CS-137	2.0 +0.3 E-01		01/10	4
32287	LCK-1550 D 0-6	12/03				PREP TOTAL-U	DISSO LVED 6.4 +1.0 E 00	PPM	*	3
						U-235	L.T. 3. E-01		01/10	4
						TH-234	3.5 +1.7 E 00		01/10	4
						PB-214	4.8 +0.7 E-01		01/10	4
						BI-214	4.6 +0.7 E-01		01/10	4
						AC-228	L.T. 2. E-01		01/10	4
						PB-212	3.9 +0.4 E-01		01/10	4
						TL-208	1.8 +0.3 E-01		01/10	4
						K-40	8.4 +0.8 E 00		01/10	4
						CS-137	1.4 +0.3 E-01		01/10	4
32288	LCK-1550 E 0-6	12/03				PREP TOTAL-U	DISSO LVED 1.0 +0.2 E 01	PPM	*	3
						U-235	L.T. 3. E-01		01/14	4
						TH-234	6.8 +0.8 E 00		01/14	4
						PB-214	5.9 +0.8 E-01		01/14	4
						BI-214	5.3 +0.8 E-01		01/14	4
						AC-228	L.T. 2. E-01		01/14	4
						PB-212	4.0 +0.5 E-01		01/14	4

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MR RICARDO DE ANDA  
DE ANDA LAW FIRM  
PLAZA DE SAN AGUSTIN

212 FLORES AVENUE  
LAREDO TX 78040

501

## TELEDYNE BROWN ENGINEERING ENVIRONMENTAL SERVICES

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DE ANDA LAW FIRM  
PLAZA DE SAN AGUSTIN  
212 FLORES AVENUE  
LAREDO TX 78040

S O I L

TELEDYNE SAMPLE NUMBER	CUSTOMER'S IDENTIFICATION	STA NUM	COLLECTION-DATE START TIME DATE	STOP TIME DATE	ACTIVITY NUCLIDE	NUCL-UNIT-% (PCU/GM DRY)	MID-COUNT TIME	VOLUME - UNITS	ASH-WGHT-%	LAB.
32291	LCK-2850 B 0-6	12/03	PREP TOTAL-U	DISO LVED 1.9 +-0.3 E 01	PPM	*	01/10	3	3	3
			U-235	4.5 +-1.8 E-01						4
			TH-234	L.T. 1. *	E 00		01/10	4	4	4
			PB-214	1.1 +-0.1	E 00		01/10	4	4	4
			BI-214	9.4 +-0.9	E-01		01/10	4	4	4
			AC-228	3.2 +-0.9	E-01		01/10	4	4	4
			PB-212	7.5 +-0.8	E-01		01/10	4	4	4
			TL-208	2.0 +-0.3	E-01		01/10	4	4	4
			K-40	7.2 +-0.7	E 00		01/10	4	4	4
			CS-137	2.3 +-0.4	E-01		01/10	4	4	4

32292 LCK-2850 C 0-6

12/03

PREP TOTAL-U	DISO LVED 1.8 +-0.3 E 00	PPM	*	3
U-235	L.T. 2. *	E-01		3
TH-234	1.1 +-0.4	E 00		4
PB-214	4.2 +-0.5	E-01		4
BI-214	4.1 +-0.5	E-01		4
AC-228	3.6 +-0.8	E-01		4
PB-212	4.2 +-0.4	E-01		4
TL-208	1.4 +-0.2	E-01		4
K-40	8.0 +-0.8	E 00		4
CS-137	7.6 +-2.2	E-02		4

32293 LCK-2850 D 0-6

12/03

PREP TOTAL-U	DISO LVED 6.6 +-1.0 E 00	PPM	*	3
U-235	L.T. 2. *	E-01		3
TH-234	L.T. 9. *	E-01		4
PB-214	9.0 +-0.9	E-01		4
BI-214	7.1 +-0.7	E-01		4
AC-228	4.2 +-0.9	E-01		4
PB-212	4.5 +-0.5	E-01		4

TELEDYNE BROWN ENGINEERING ENVIRONMENTAL SERVICES

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3-1784
M.R. RICARDO DE ANDA DE ANDA LAW FIRM PLAZA DE SAN AGUSTIN 212 FLORES AVENUE LAREDO TX 78040

105

ELDENE SAMPLE NUMBER	CUSTOMER'S IDENTIFICATION	COLLECTION-DATE				NUCLEIDE	ACTIVITY (PCI/GM DRY)	NUCL-UNIT-% U/H *	TIME DATE TIME	VOLUME - ASH-WGHT-% *	MID-COUNT LAB.
		STA NUM	START DATE	STOP TIME	DATE						
32293	LCK-2850 D 0-6	12/03				TL-208 K-40 CS-137	1.8 +0.3 E-01 7.5 +0.8 E-00 1.8 +0.3 E-01		01/10 01/10 01/10	4 4 4	
32294	LCK-2850 E 0-6	12/03				PREP TOTAL-U U-235 TH-234 PB-214 BI-214 AC-228 PB-212 TL-208 K-40 CS-137	1.9 +0.3 E-00 L.T. 2. L.T. 5. 5.5 +0.6 E-01 4.9 +0.5 E-01 L.T. 1. 5.3 +0.5 E-01 1.7 +0.2 E-01 8.0 +0.8 E-00 1.2 +0.3 E-01	PPM E-01 E-01 E-01 E-01 E-01 E-01 E-01 E-01 E-01	01/10 01/10 01/10 01/10 01/10 01/10 01/10 01/10 01/10 01/10	3 3 4 4 4 4 4 4 4 4	
32295	LG-50 A 0-6	12/03				DISSO LVED TOTAL-U U-235 TH-234 PB-214 BI-214 AC-228 PB-212 TL-208 K-40 CS-137	1.1 +0.2 E-00 L.T. 2. L.T. 7. 4.1 +0.7 E-01 3.8 +0.6 E-01 4.0 +1.0 E-01 3.0 +0.4 E-01 1.1 +0.3 E-01 7.4 +0.7 E-00 L.T. 3.	PPM E-01 E-01 E-01 E-01 E-01 E-01 E-01 E-01 E-01	01/14 01/14 01/14 01/14 01/14 01/14 01/14 01/14 01/14 01/14	3 3 4 4 4 4 4 4 4 4	

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212 FLORES AVENUE  
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## SAMPLE

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## CUSTOMER'S

## IDENTIFICATION

## STA

## NUM

## START

## STOP

## DATE

## TIME

## DATE

## TIME

## NUCLEIDE

32296 LG-50 A 6-12 12/03

PREP TOTAL-U

DISSO LVED

1.3 +-0.2 E 00 PPM

L.T. 2. E-01

U-235

L.T. 6. E-01

TH-234

3.9 +-0.6 E-01

PB-214

4.3 +-0.6 E-01

BI-214

3.9 +-1.0 E-01

AC-228

3.2 +-0.3 E-01

PB-212

9.4 +-2.5 E-02

TL-208

1.1 +-0.1 E-01

K-40

CS-137

L.T. 3. E-02

PREP TOTAL-U

DISSO LVED

1.2 +-0.2 E 00 PPM

L.T. 2. E-01

U-235

L.T. 6. E-01

TH-234

6.2 +-0.6 E-01

PB-214

3.5 +-0.6 E-01

BI-214

3.5 +-0.4 E-01

AC-228

1.4 +-0.3 E-01

PB-212

7.7 +-0.8 E-00

K-40

CS-137

L.T. 3. E-02

PREP TOTAL-U

DISSO LVED

1.5 +-0.2 E 00 PPM

L.T. 1. E-01

U-235

L.T. 5. E-01

TH-234

4.6 +-0.5 E-01

PB-214

3.9 +-0.5 E-01

BI-214

3.9 +-0.7 E-01

AC-228

3.2 +-0.3 E-01

PB-212

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COLLECTION-DATE

STOP

DATE

TIME

DATE

TIME

NUCLIDE

ACTIVITY

NUCL-UNIT-%

TIME

VOLUME - UNITS

ASH-WGHT-%

LAB.

TELEDYNE

SAMPLE

CUSTOMER'S

IDENTIFICATION

STA

NUM

DATE

TIME

DATE

TIME

NUCLIDE

SOIL

HID-COUNT

TIME

DATE

TIME

ASH-WGHT-%

LAB.

ACTIVITY

NUCL-UNIT-%

TIME

VOLUME - UNITS

ASH-WGHT-%

LAB.

12/03

PREP

DISSO LVED

HID-COUNT

TIME

DATE

TIME

ASH-WGHT-%

LAB.

TOTAL-U

PPM

\*

01/13

U-235

E-01

01/13

TH-234

E-01

01/13

PB-214

E-01

01/13

BI-214

E-01

01/13

AC-228

E-01

01/13

PB-212

E-01

01/13

TL-208

E-01

01/13

K-40

E-01

01/13

CS-137

E-02

01/13

ACTIVITY

NUCL-UNIT-%

TIME

VOLUME - UNITS

ASH-WGHT-%

LAB.

ACTIVITY

NUCL-UNIT-%

TIME

VOLUME - UNITS

ASH-WGHT-%

TELEDYNE BORG ENVIRONMENTAL SERVICES

REPORT OF ANALYSIS			RUN DATE
WORK ORDER NUMBER	CUSTOMER P.O. NUMBER	DATE RECEIVED	PAGE
3-1784		12/05/96	01/08/97
			15
			01/21/97

RICARDO DE ANDA  
DE ANDA LAW FIRM  
PLAZA DE SAN AGUSTIN  
212 FLORES AVENUE  
LAREDO TX

## REPORT OF ANALYSIS

WORK ORDER NUMBER  
3-1784

— 1 —

TELEDYNE  
SAMPLE  
NUMBER

## TELEDYNE BROWN ENGINEERING ENVIRONMENTAL SERVICES

## REPORT OF ANALYSIS

RUN DATE 01/21/97

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WORK ORDER NUMBER 3-1784  
 CUSTOMER P.O. NUMBER 12/05/96  
 DATE RECEIVED DELIVERY DATE 01/08/97

MR RICARDO DE ANDA  
 DE ANDA LAW FIRM  
 PLAZA DE SAN AGUSTIN  
 212 FLORES AVENUE  
 LAREDO TX  
 78040

## SOIL

TELEDYNE SAMPLE NUMBER	CUSTOMER'S IDENTIFICATION	STA NUM	COLLECTION-DATE	ACTIVITY (PPC/GH DRY)	NUCL-UNIT-% U/H *	MID-COUNT TIME	VOLUME - UNITS ASH-WEIGHT-%	DELIVERY DATE	PAGE 16
32308 LG-550 A 6-12		12/03	TL-208 K-40 CS-137	1.0 +-0.2 7.8 +-0.8 3.9 +-1.6	E-01 E-02 E-02	01/13 01/13 01/13			
32309 LG-550 B 0-6		12/03	PREP TOTAL-U U-235 TH-234 PB-214 BI-214 AC-228 PB-212 PB-210 TL-208 K-40 CS-137	1.1 +-0.2 L.T. L.T. 4.8 +-0.6 3.7 +-0.5 2.5 +-0.9 2.7 +-0.3 9.3 +-2.5 6.7 +-0.7 L.T.	E-00 E-01 E-01 E-01 E-01 E-01 E-01 E-02 E-02 E-02	*	01/13 01/13 01/13 01/13 01/13 01/13 01/13 01/13 01/13 01/13		
32310 LG-550 C 0-6		12/03	PREP TOTAL-U U-235 TH-234 PB-214 BI-214 AC-228 PB-212 TL-208 K-40 CS-137	1.5 +-0.2 L.T. L.T. 5.1 +-0.8 L.T. L.T. 2.8 +-0.4 1.4 +-0.3 7.0 +-0.7 9.6 +-2.9	E-00 E-01 E-00 E-01 E-01 E-01 E-01 E-01 E-02	*	01/13 01/13 01/13 01/13 01/13 01/13 01/13 01/13 01/13		

## TELEDYNE BROWN ENGINEERING ENVIRONMENTAL SERVICES

## REPORT OF ANALYSIS

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WORK ORDER NUMBER 3-1784

DATE RECEIVED 12/05/96

DELIVERY DATE 01/08/97

MR RICARDO DE ANDA  
DE ANDA LAW FIRM  
PLAZA DE SAN AGUSTIN  
212 FLORES AVENUE  
LAREDO TX 78040

TELEDYNE  
SAMPLE  
NUMBER

CUSTOMER'S  
IDENTIFICATION

STA  
NUM

COLLECTION-DATE  
START  
DATE

STOP  
TIME

DATE

TIME

NUCLIDE

ACTIVITY  
(PCU/GM DRY)

DISO

LVED

NUCL-UNIT-%

U/H \*

PPM

\*

MID-COUNT  
TIME

VOLUME - %

ASH-WGHT-%

UNITS

DATE

TIME

LAB.

PREP  
TOTAL-U

U-235

L-T.

2.

E-01

01/13

TH-234

1•1

+-0•3

E-00

01/13

PB-214

3•6

+-0•5

E-01

01/13

BI-214

3•5

+-0•5

E-01

01/13

AC-228

2•7

+-0•7

E-01

01/13

PB-212

2•6

+-0•3

E-01

01/13

TL-208

1•1

+-0•2

E-01

01/13

K-40

7•6

+-0•8

E-00

01/13

CS-137

3•9

+-0•4

E-01

01/13

PREP  
TOTAL-U

U-235

L-T.

2•

E-01

01/13

TH-234

1•1

+-0•3

E-00

01/13

PB-214

4•8

+-0•5

E-01

01/13

BI-214

4•7

+-0•5

E-01

01/13

AC-228

2•8

+-0•7

E-01

01/13

PB-212

3•9

+-0•4

E-01

01/13

TL-208

1•1

+-0•2

E-01

01/13

K-40

7•6

+-0•8

E-00

01/13

CS-137

1•1

+-0•2

E-01

01/13

PREP  
TOTAL-U

U-235

L-T.

1•1

+-0•5

E-00

01/13

TH-234

1•7

+-0•4

E-00

01/13

PB-214

6•4

+-0•6

E-01

01/13

BI-214

5•6

+-0•6

E-01

01/13

AC-228

3•8

+-0•7

E-01

01/13

PB-212

3•5

+-0•4

E-01

01/13

SOIL

ACTIVITY  
(PCU/GM DRY)

DISO

LVED

NUCL-UNIT-%

U/H \*

PPM

\*

MID-COUNT  
TIME

VOLUME - %

ASH-WGHT-%

UNITS

DATE

TIME

LAB.

## TELEDYNE BROWN ENGINEERING ENVIRONMENTAL SERVICES

## REPORT OF ANALYSIS

RUN DATE 01/21/97

WORK ORDER NUMBER

3-1784

CUSTOMER P.O. NUMBER

MR RICARDO DE ANDA  
DE ANDA LAW FIRM  
PLAZA DE SAN AGUSTIN  
212 FLORES AVENUE  
LAREDO TX 78040

DATE RECEIVED

12/05/96

DELIVERY DATE

01/08/97

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TELEDYNE  
SAMPLE  
NUMBER

CUSTOMER'S  
IDENTIFICATION  
NO. 1 0-6

COLLECTION-DATE  
START  
STOP  
DATE TIME DATE TIME NUCLIDE

12/03

ACTIVITY  
(PCU/GM DRY)  
NUCL-UNIT-%  
U/H \*

TL-208  
K-40  
CS-137

%

E-01

E-00

E-01

E-02



## TELEDYNE BROWN ENGINEERING ENVIRONMENTAL SERVICES

RUN DATE 01/21/97  
 REPORT OF ANALYSIS  
 WORK ORDER NUMBER CUSTOMER P.O. NUMBER  
 3-1784 12/05/96 01/08/97

MR RICARDO DE ANDA  
 DE ANDA LAW FIRM  
 PLAZA DE SAN AGUSTIN  
 212 FLORES AVENUE  
 LAREDO TX 78040

TELEDYNE  
SAMPLE  
NUMBERCUSTOMER'S  
IDENTIFICATION

## COLLECTION-DATE

	STA NUM	START DATE	STOP TIME	DATE	TIME	NUCLIDE	ACTIVITY (PCU/GM DRY)	NUCL-UNIT-% U/N *	HID-COUNT TIME	VOLUME - ASH-WEIGHT-%	UNITS LAB.
32325	POND C NO. 2 0-6	12/03				TL-208 K-40 CS-137	3.02 +-0.3 1.03 +-0.1 L.T. 4.	E-01 E-01 E-02	01/14 01/14 01/14	4 4 4	

## S O I L

TELEDYNE  
SAMPLE  
NUMBERCUSTOMER'S  
IDENTIFICATION

## COLLECTION-DATE

## TELEDYNE BROWN ENGINEERING ENVIRONMENTAL SERVICES

RUN DATE 01/21/97

## REPORT OF ANALYSIS

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WORK ORDER NUMBER

3-1784

MR RICARDO DE ANDA  
DE ANDA LAW FIRM  
PLAZA DE SAN AGUSTIN  
212 FLORES AVENUE  
LAREDO TX  
78040

DATE RECEIVED 12/05/96

DELIVERY DATE 01/08/97

## VEGETATION/TERRESTRIAL

TELEDYNE NUMBER	SAMPLE NUMBER	CUSTOMER'S IDENTIFICATION	STA NUM	COLLECTION-DATE START DATE	STOP TIME	TIME	NUCLIDE	ACTIVITY (PCU/GH WET)	NUCL-UNIT-% U/H *	MID-COUNT TIME	VOLUME - UNITS	ASH-WEIGHT-% *	LAB.
32313	VEG SPG OUTPD NO SIDE	12/03	BE-7 K-40	1.97+0.47E 00 2.35+0.50E 00	L.T.	6*	E-02	12/06 12/06	4	4	4	4	4
			MN-54	L.T.	6*	E-02							
			LO-58	L.T.	6*	E-02							
			FE-59	L.T.	1*	E-01							
			CO-60	L.T.	6*	E-02							
			ZN-65	L.T.	1*	E-01							
			ZR-95	L.T.	6*	E-02							
			RU-103	L.T.	7*	E-02							
			RU-106	L.T.	6*	E-01							
			I-131	L.T.	9*	E-02							
			CS-134	L.T.	6*	E-02							
			CS-137	L.T.	7*	E-02							
			BA-140	L.T.	7*	E-02							
			CE-141	L.T.	9*	E-02							
			CE-144	L.T.	4*	E-01							
			RA-226	L.T.	1*	E-00							
			TH-228	L.T.	1*	E-01							
			TOTAL-U	L.T.	1*	E-00							
32314	VEG SPG OUTPD SO SIDE	12/03	BE-7 K-40	2.38+0.85E 00 7.01+-1.09E 00	L.T.	1*	E-01	12/06 12/06	4	4	4	4	4
			MN-54	L.T.	1*	E-01							
			CO-58	L.T.	1*	E-01							
			FE-59	L.T.	2*	E-01							
			CO-60	L.T.	1*	E-01							
			ZN-65	L.T.	3*	E-01							
			ZR-95	L.T.	1*	E-01							
			RU-103	L.T.	1*	E-01							
			RU-106	L.T.	1*	E-00							
			I-131	L.T.	2*	E-01							
			CS-134	L.T.	1.	E-01							

## TELEDYNE BROWN ENGINEERING ENVIRONMENTAL SERVICES

RUN DATE 01/21/97

## REPORT OF ANALYSIS

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MR RICARDO DE ANDA  
DE ANDA LAW FIRM  
PLAZA DE SAN AGUSTIN  
212 FLORES AVENUE  
LAREDO TX 78040

WORK ORDER NUMBER 3-1784  
CUSTOMER P.O. NUMBER  
DATE RECEIVED 12/05/96  
DELIVERY DATE 01/08/97

TELEDYNE  
SAMPLE  
NUMBER  
32314 VEG SPG OUTPD SO SIDE

## VEGETATION/TERRRESTRIAL

TELEDYNE SAMPLE NUMBER	CUSTOMER'S IDENTIFICATION	STA NUM	COLLECTION-DATE START DATE	STOP TIME	TIME	NUCLIDE	ACTIVITY (PCU/GM WET)	NUCL-UNIT-X U/H *	MID-COUNT DATE TIME	VOLUME - ASH-WGHT-X *	UNITS LAB.
			12/03			CS-137	L.T.	E-01	12/06		
						BA-140	L.T.	E-01	12/06		
						CE-141	L.T.	2*	E-01	12/06	
						CE-144	L.T.	7*	E-01	12/06	
						RA-226	L.T.	2*	E-00	12/06	
						TH-228	L.T.	2*	E-01	12/06	
						TOTAL-U	L.T.	2*	E-00	12/06	
						BE-7	1•89+-0•51E 00		12/06		
						K-40	2•26+-0•55E 00		12/06		
						MN-54	L.T.	7*	E-02	12/06	
						CO-58	L.T.	6*	E-02	12/06	
						FE-59	L.T.	1*	E-01	12/06	
						CO-60	L.T.	7*	E-02	12/06	
						ZN-65	L.T.	1*	E-01	12/06	
						ZR-95	L.T.	7*	E-02	12/06	
						RU-103	L.T.	7*	E-02	12/06	
						RU-106	L.T.	6*	E-01	12/06	
						I-131	L.T.	9*	E-02	12/06	
						CS-134	L.T.	7*	E-02	12/06	
						CS-137	L.T.	7*	E-02	12/06	
						BA-140	L.T.	8*	E-02	12/06	
						CE-141	L.T.	9*	E-02	12/06	
						CE-144	L.T.	4*	E-01	12/06	
						RA-226	L.T.	1*	E-00	12/06	
						TH-228	L.T.	1*	E-01	12/06	
						TOTAL-U	L.T.	1*	E-00	12/06	

TELEDYNE BROWN ENGINEERING ENVIRONMENTAL SERVICES

REPORT OF ANALYSIS

MR RICARDO DE ANDA  
DE ANDA LAW FIRM  
PLAZA DE SAN AGUSTIN  
212 FLORES AVENUE  
LAREDO, TX  
78040

WORK ORDER NUMBER	CUSTOMER P.O. NUMBER	DATE RECEIVED	DELIVERY DATE	PAGE
3-1784		12/05/96	01/08/97	23

VEGETATION/TERRESTRIAL

TELEDYNE SAMPLE NUMBER	CUSTOMER'S IDENTIFICATION	STA NUM	COLLECTION-DATE START DATE	STOP TIME	NUCLIDE	ACTIVITY (PCI/GM WET)	NUCL-UNIT-% U/H *	MID-COUNT TIME	VOLUME - UNITS ASH-WEIGHT-%	LAB.
32316	VEG SPG OUTPD W SIDE	12/03	8E-7	3.33+0.52E 00		12/06				
	K-40		3.36+0.59E 00			12/06				
	MN-54	L.T.	6.	E-02		12/06				
	CO-58	L.T.	6.	E-02		12/06				
	FE-59	L.T.	1.	E-01		12/06				
	CO-60	L.T.	7.	E-02		12/06				
	ZN-65	L.T.	1.	E-01		12/06				
	ZR-95	L.T.	6.	E-02		12/06				
	RU-103	L.T.	7.	E-02		12/06				
	RJ-106	L.T.	6.	E-01		12/06				
	I-131	L.T.	1.	E-01		12/06				
	CS-134	L.T.	7.	E-02		12/06				
	CS-137	L.T.	7.	E-02		12/06				
	BA-140	L.T.	8.	E-02		12/06				
	CE-141	L.T.	1.	E-01		12/06				
	CE-144	L.T.	5.	E-01		12/06				
	RA-226	L.T.	2.	E 00		12/06				
	TH-228	L.T.	1.	E-01		12/06				
	TOTAL-U	L.T.	1.	E 00		12/06				
32317	VEG SPG OUTPD LWR ARE	12/03	BE-7	4.13+2.19E-01		12/06				
	K-40	3.17+0.32E 00				12/06				
	MN-54	L.T.	3.	E-02		12/06				
	CO-58	L.T.	3.	E-02		12/06				
	FE-59	L.T.	6.	E-02		12/06				
	CO-60	L.T.	3.	E-02		12/06				
	ZN-65	L.T.	7.	E-02		12/06				
	ZR-95	L.T.	3.	E-02		12/06				
	RU-103	L.T.	3.	E-02		12/06				
	RU-106	L.T.	3.	E-01		12/06				
	I-131	L.T.	4.	E-02		12/06				
	CS-134	L.T.	3.	E-02		12/06				

## TELEDYNE BROWN ENGINEERING ENVIRONMENTAL SERVICES

## REPORT OF ANALYSIS

WORK ORDER NUMBER			CUSTOMER P.O. NUMBER			DATE RECEIVED			DELIVERY DATE			RUN DATE 01/21/97		PAGE 24	
3-1784						12/05/96			01/08/97						
<p>MR RICARDO DE ANDA DE ANDA LAW FIRM PLAZA DE SAN AGUSTIN 212 FLORES AVENUE LAREDO TX 78040</p>															

## VEGETATION/TERRESTRIAL

TELEDYNE SAMPLE NUMBER	CUSTOMER'S IDENTIFICATION	COLLECTION-DATE			NUCLIDE	(PCI/GH WET)	ACTIVITY U/H *	NUCL-UNIT-%	TIME	TIME	VOLUME - UNITS	ASH-WGHT-%	DATE	MID-COUNT	LAB.
		START DATE	STOP DATE	TIME											
32317	VEG SPG OUTPD LWR ARE	12/03			CS-137	L.T.	3.	E-02			12/06				
					BA-140	L.T.	4.	E-02			12/06				4
					CE-141	L.T.	4.	E-02			12/06				4
					CE-144	L.T.	2.	E-01			12/06				4
					RA-226	L.T.	6.	E-01			12/06				4
					TH-228	L.T.	5.	E-02			12/06				4
					TOTAL-U	L.T.	5.	E-01			12/06				4
											12/06				4

## TELEDYNE BROWN ENGINEERING ENVIRONMENTAL SERVICES

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WORK ORDER NUMBER 3-1784  
 CUSTOMER P.O. NUMBER 12/05/96  
 RUN DATE 01/06/97

MR RICARDO DE ANDA  
 DE ANDA LAW FIRM  
 PLAZA DE SAN AGUSTIN  
 212 FLORES AVENUE  
 LAREDO TX 78040

## WATER

TELEDYNE SAMPLE NUMBER	CUSTOMER'S IDENTIFICATION	COLLECTION-DATE START DATE	STOP DATE	TIME DATE	NUCLIDE	ACTIVITY ( PCI/LITER)	NUCL-UNIT-% U/H U	MID-COUNT TIME	VOLUME - UNITS ASH-WGHT-%	LAB.
32318	WATER SPRING OUTPOND	12/03			RA-226 TOTAL U	L.T. 7.0 + - 1.1	E-01 UGM/LITER *	01/02		2
32319	WATER SPR NATRL POND	12/03			RA-226 TOTAL U	9.4 + - 2.8	E-01 UGM/LITER *	01/02		3
						5.4 + - 0.8	E-01 UGM/LITER *			2
										3

## LAST PAGE OF REPORT

SEND 1 COPIES TO DE20SS MR RICARDO DE ANDA  
 SEND 1 COPIES TO DE20ST MR MARVIN RESNIKOFF

2 - GAS LAB.

3 - RADIO CHEMISTRY LAB.

4 - GE(LI) GAMMA SPEC LAB.

5 - TRITIUM GAS/L.S. LAB.

6 - ALPHA SPEC LAB.

*J. Guenther*

APPROVED BY J. GUENTHER 01/21/97