

DUKE ENERGY FIELD SERVICES



IRP-71
10/5/05

SITE INVESTIGATION, REMEDIATION, AND FINAL C-141 CLOSURE DOCUMENTATION

G-28 LOOP LINE RELEASE SITE

DEFS REF: G-28 LOOP LINE EAST 031902

UL-F (SE¼ OF THE NW¼) OF SECTION 7 T22S R36E

~8.9 MILES WEST-SOUTHWEST (257.6°) OF EUNICE

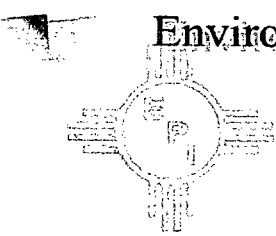
LEA COUNTY, NEW MEXICO

LATITUDE: N32° 24' 27.93"

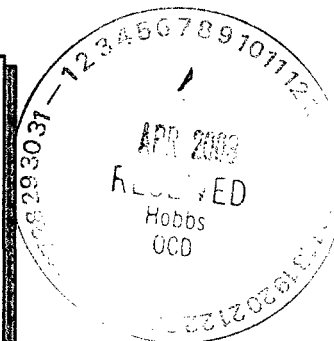
LONGITUDE: W103° 18' 28.14"

MARCH 31, 2003

PREPARED BY: JCG



John Good
Environmental Consultant
Environmental Plus, Inc.
PO Box 1558
Eunice, NM 88231
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ENVIRONMENTAL PLUS, INC. *Micro-Blaze Micro-Blaze Out™*

STATE APPROVED LAND FARM AND ENVIRONMENTAL SERVICES

March 31, 2003

Mr. Larry Johnson
Energy, Minerals, and Natural Resources Department
New Mexico Oil Conservation Division
1625 North French Dr.
Hobbs, New Mexico 88240

Subject: DEFS – G28 Loop Line East 031902 Final C-141 and Closure Documentation

Dear Mr. Johnson:

Environmental Plus, Inc. (EPI), on behalf of Duke Energy Field Services (DEFS) submits for your consideration and approval the Final C-141 and Closure Documentation for the "G28 Loop Line East 031902" remediation site. This report documents the vertical and horizontal extents of hydrocarbon contamination at the site, removal of contaminated soils above acceptable CoC levels and disposal of said contaminated soils at EPI's approved land farm. This submittal is consistent with the Initial C-141 and Remediation Plan submitted to NMOCDD on March 19, 2002. Therefore, on behalf of Duke Energy Field Services, EPI requests that the NMOCDD consider the information provided within this documentation and require "no further action" at this site.

If there are any questions please call Mr. Ben Miller or myself at EPI's offices, or at 505-390-0288 or 505-390-9804 respectively. Mr. Paul Mulkey of Duke Energy Field Services can be contacted at 505-397-5716.

Please address all official correspondence regarding this release to Mr. Paul Mulkey at:

Duke Energy Field Services
11525 West Carlsbad Highway
Hobbs, New Mexico 88240

Sincerely,

John Good, Environmental Consultant

cc: Paul Mulkey, Duke Energy Field Services, Hobbs, w/enclosure
Lynn Ward, Duke Energy Field Services, Midland, w/enclosure
Steve Weathers, Duke Energy Field Services, Denver, w/enclosure
Sherry Miller, President, Environmental Plus, Inc.
Ben Miller, Vice President/General Manager, Environmental Plus, Inc.
Pat McCasland, EPI Technical Manager, Environmental Plus, Inc.
File

ENVIRONMENTAL PLUS, INC.

Table of Contents

Executive Summary	2
Introduction	2
Background	2
Site Description	3
.1 Geological Description	3
.2 Ecological Description	3
.3 Area Ground Water	3
.4 Area Water Wells	3
.5 Area Surface Water Features	3
NMOCD Site Ranking	3
Subsurface Soil Investigation	4
Ground Water Investigation	4
Remediation	5
Closure Justification	5
<u>ATTACHMENTS</u>	7-14
Plate 1: Site Location Map	8
Plate 2: Site Topography Map	9
Plate 3: GPS Demarcation with Site Features	10
Plate 4: Soil Analytical Data and Associated Bar Charts	11
Lab Analyses Reports and Chain-of-Custody Forms	12
Final NMOCD C-141 Form	13
Site Information and Metrics Form	14

Executive Summary

Environmental Plus, Inc. (EPI) was notified by Duke Energy Field Services (DEFS) on March 19, 2002 regarding a historical pipeline release site involving DEFS' "G-28 Loop Line" natural gas gathering pipeline. DEFS' initial C-141 (03-19-02) indicates an unknown release volume and no recovery. The leak was historical in nature and was the result of internal pipeline corrosion. DEFS personnel repaired the steel pipeline by clamping.

Characterization and remedial work by EPI commenced on March 19, 2002 and was completed on April 16, 2002. The "G-28 Loop Line East 031902" site is located ~8.9-miles west-southwest (257.6°) of Eunice, NM, in Unit Letter F, (SE¼ of the NW¼), Section 07, T22S, R36E, (N32°24'27.93" and W103°18'28.11"). The spill occurred on property owned by the State of New Mexico. The surface extent of the reported spill was approximately 1,411-ft² (see Plate 3, Attachments). The vertical extent of contamination did not extend below 15-ft below ground surface (bgs).

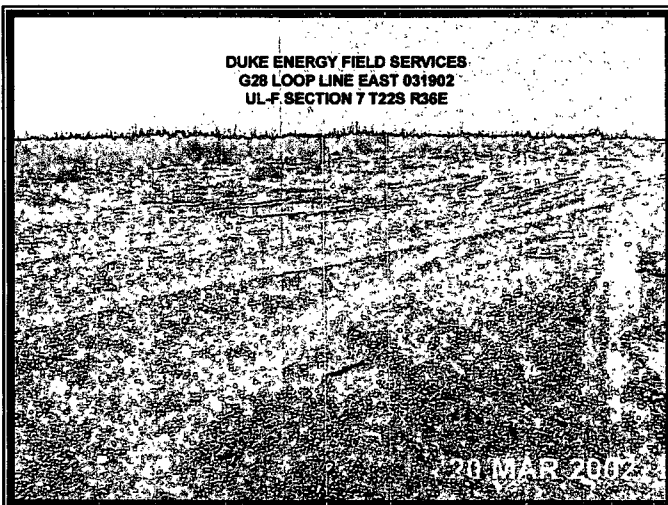


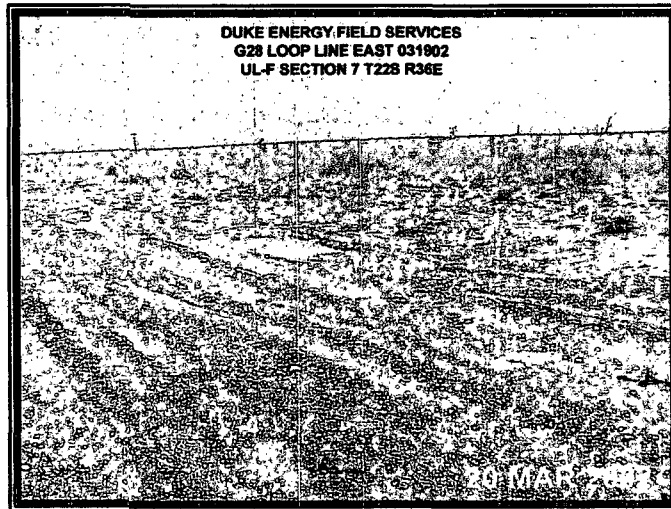
EPI excavated and disposed of 472-yd³ of contaminated soil from the site commencing on March 19, 2002. Composite bottom-hole and sidewall soil samples were submitted to Cardinal Laboratories, Hobbs, NM on April 9, 2002. Results of these analyses confirmed that TPH, BTEX, and Benzene levels were below threshold levels throughout the site.

All contaminated soil removed from the site was disposed of at EPI's NMOCD approved land farm. The excavation was backfilled with clean caliche and topsoil. The site was contoured to prevent pooling over the excavation site.

1.0 Introduction

This report addresses the site investigation and remediation of the DEFS "G-28 Loop Line East 031902" natural gas gathering line remediation site. On March 19, 2002, DEFS notified EPI regarding a natural gas and associated NGL release at this site. The initial C-141 Form submitted to NMOCD (March 19, 2002) contains no data concerning release volumes, and indicates zero recovery. EPI responded the same day (March 19, 2002) and commenced GPS delineation, photography, characterization and preliminary excavation of the contaminated soil in the immediate area of the reported leak. The site initially consisted of an area ~40-ft X ~50-ft associated with the release. The total release affected area





W103°18'28.11"). The land is owned by the State of New Mexico. A site location map, site topographical map and a detailed GPS site diagram are included in the *Attachments as Plates 1, 2 and 3*.

The natural gas and associated NGL release at this site was discovered March 19, 2002. The leak was the result of internal pipe corrosion. The pipe was clamped and repaired by DEFS personnel.

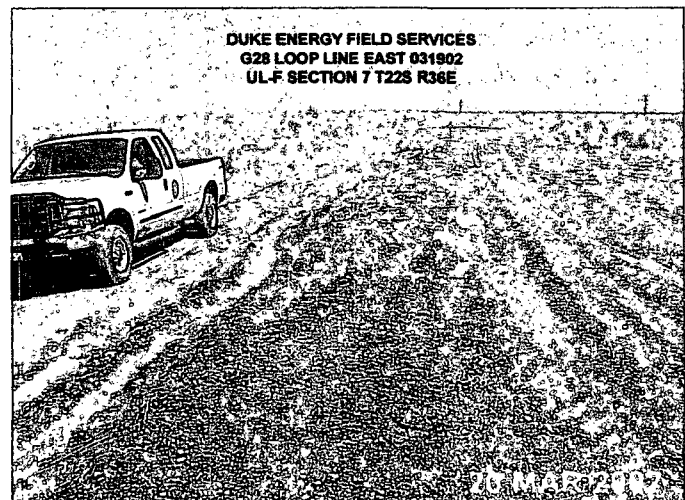
3.0 Site Description

3.1 Geological Description

The United States Geological Survey (USGS) Ground-Water Report 6, "Geology and Ground-Water Conditions in Southern Lea County, New Mexico," A. Nicholson and A. Clebsch, 1961, describes the near surface geology of southern Lea County as "an intergrade of the Quaternary Alluvium (QA) sediments, i.e., fine to medium sand, with the mostly eroded Cenozoic Ogallala (CO) formation. Typically, the QA and CO formations in the area are capped by a thick interbed of caliche and generally overlain by sandy soil." The release site is located in the Eunice Plains physiographic subdivision, described by Nicholson & Clebsch as an area "underlain by a resistant caliche surface, and almost entirely covered by red dune sand. The Eunice Plains surface generally slopes east-southeast.

3.2 Ecological Description

The area is typical of the Upper Chihuahuan Desert Biome consisting primarily of hummocky sand hills covered with Harvard Shin Oak (*Quercus harvardi*) interspersed with Honey Mesquite (*Prosopis glandulosa*) along with typical desert grasses, flowering annuals and flowering perennials. Mammals represented, include Orrd's and Merriam's Kangaroo Rat, Deer Mouse,



comprised ~1,411-ft². Remediation of this release site consisted of excavation and disposal of contaminated soil at EPI's Land Farm, soil analyses, backfill and contouring of the excavation. Completion of the site remediation project was on April 16, 2002.

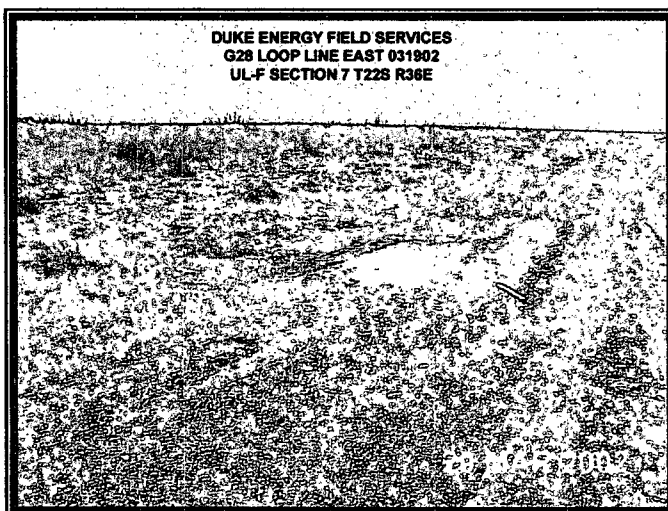
2.0 Background

The site is associated with the DEFS G-28 Loop Line natural gas gathering pipeline. This release site is located ~8.9-miles west-southwest (257.6°) of Eunice, NM, in Unit Letter F, (SE¼ of the NW¼), Section 07, T22S, R36E, (N32°24'27.93" and

White Throated Wood Rat, Cottontail Rabbit, Black Tailed Jackrabbit, Mule Deer, Bobcat, Red Fox and Coyote. Reptiles, Amphibians, and Birds are numerous and typical of area. A survey of Listed, Threatened, or Endangered species was not conducted.

3.3 Area Ground Water

The estimated depth to the unconfined ground water aquifer at this site is 195-ft bgs, based on data obtained from the NM State Engineers Office. The site is located in the Eunice Plains physiographic area approximately 8.9-miles west-southwest (257.6°) of Eunice, NM. Ground water gradient in this area is generally to the southeast.



3.4 Area Water Wells

All recorded wells are greater than 1000 horizontal feet from the site.

3.5 Area Surface Water Features

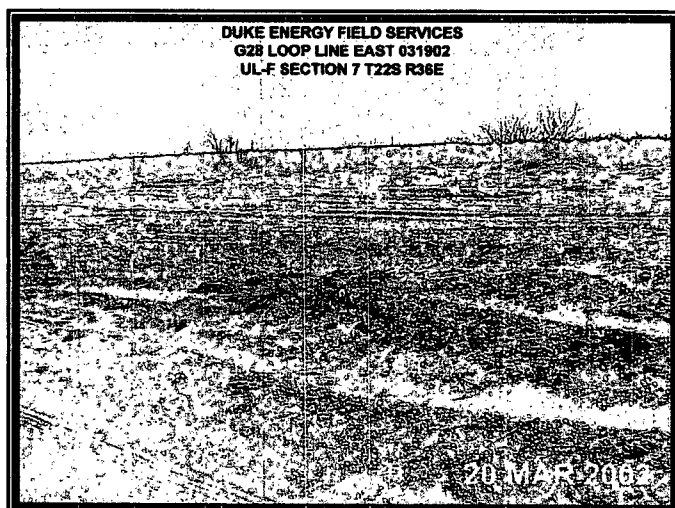
No surface water bodies exist within 1000 horizontal feet of the site.

4.0 NMOCD Site Ranking

Contaminant delineation and remedial work done at this site indicate that the chemical parameters of the soil and the physical parameters of the ground water were characterized consistent with the characterization and remediation/abatement goals and objectives set forth in the following New Mexico Oil Conservation Division (NMOCD) publications:

- ◆ Guidelines for Remediation of Leaks, Spills and Releases (August 13, 1993)
- ◆ Unlined Surface Impoundment Closure Guidelines (February 1993)

Acceptable thresholds for contaminants/constituents of concern (CoCs), i.e., TPH^{8015m}, Benzene, and the mass sum of Benzene, Toluene, Ethyl Benzene, and total Xylenes (BTEX), was determined based on the NMOCD Ranking Criteria as follows:



- ◆ *Depth to Ground water, i.e., distance from the lower most acceptable concentration to the ground water.*
- ◆ *Wellhead Protection Area, i.e., distance from fresh water supply wells.*
- ◆ *Distance to Surface Water Body, i.e., horizontal distance to all down gradient surface water bodies.*

Based on the proximity of the site to

protectable area water wells, surface water bodies, and depth to ground water from the lower most contamination, the NMOCD ranking score for the site is 0 points with the soil remedial goals highlighted in the Site Ranking table presented below.

1. Ground Water	2. Wellhead Protection Area	3. Distance to Surface Water	
Depth to GW <50 feet: 20 points	If <1000' from water source, or; <200' from private domestic water source: 20 points	<200 horizontal feet: 20 points	
Depth to GW 50 to 99 feet: 10 points		200-1000 horizontal feet: 10 points	
Depth to GW >100 feet: 0 points	If >1000' from water source, or; >200' from private domestic water source: 0 points	>1000 horizontal feet: 0 points	
Ground Water Score = 0	Wellhead Protection Score= 0	Surface Water Score= 0	
Site Rank (1+2+3) = 0 + 0 + 0 = 0 points (for soil 0-95'bgs)			
Total Site Ranking Score and Acceptable Remedial Goal Concentrations			
Parameter	20 or >	10	0
Benzene ¹	10 ppm	10 ppm	10 ppm
BTEX ¹	50 ppm	50 ppm	50 ppm
TPH	100 ppm	1000 ppm	5000 ppm
¹ 100 ppm field VOC headspace measurement may be substituted for lab analysis			

5.0 Subsurface Soil Investigation

The subsurface soil samples were composite samples taken from the bottom and sidewalls of the excavation on April 9, 2002. Lab analyses results of this sampling event confirmed that TPH, BTEX, Benzene and Chloride levels were below the Remedial Goals for this site. *Plate 4* in the Attachments is a summary table, with charts, of the results of the composite soil sampling performed for this remediation project.

6.0 Ground Water Investigation

The conservatively estimated depth to ground water at this site is 195-ft bgs. Excavation of the site



was to a maximum depth of 15-ft. Final CoC levels of the bottom-hole and sidewalls of the excavation were analyzed to be within the following ranges: TPH – 20 to 34.4 ppm; Benzene – 0 to 0.005 ppm; BTEX – 0 to 0.03 ppm; and, Chlorides – 32 to 80 ppm.

The excavation was backfilled with clean backfill material (caliche and top soil), and then contoured to prevent pooling of runoff water. Based on the removal the Constituents of Concern and adequate depth to ground water, there will be no need for further ground water investigation at this site.

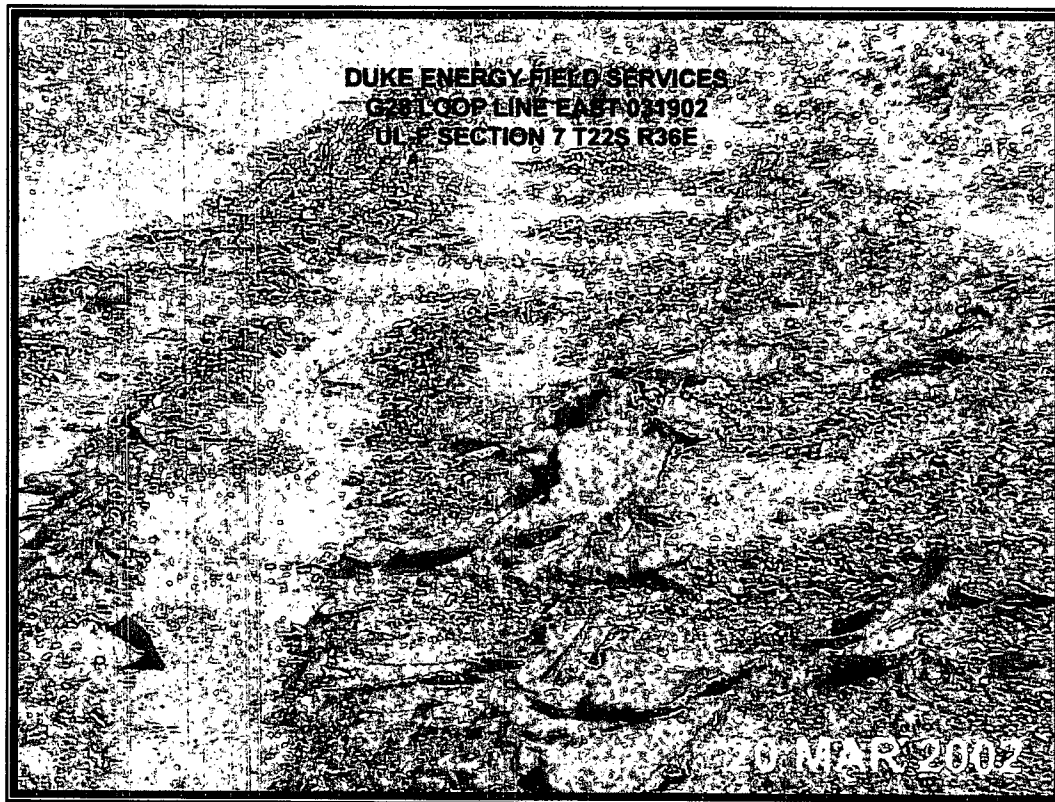
7.0 Remediation

Remediation of the site commenced on March 19, 2002 and continued through April 16, 2002. Site remediation consisted of excavation and disposal of 472 yd³ of RCRA Exempt contaminated soil in EPI's approved land farm located south of Eunice, NM. The excavation was backfilled with clean caliche and top soil material.

The excavation was composite sampled on April 9, 2002. Results of the bottom hole and sidewall analyses (*Plate 4 – Attachments*) indicated that no further excavation was necessary to achieve remedial goals in the excavation.

8.0 Closure Justification

This report documents successful implementation of the Remediation Plan approved by NMOCD for this release site. Soil contaminated above acceptable CoC remedial concentrations was excavated and removed from the location. Disposal of RCRA exempt contaminated soils was at EPI's approved land farm. The excavation was backfilled with clean caliche and topsoil and properly contoured to provide adequate drainage. Based on the data presented in this report, Environmental Plus, Inc., on behalf of Duke Energy Field Services, requests that the NMOCD require "no further action" at this site.



ATTACHMENTS

Plate 1: Site Location Map	8
Plate 2: Site Topography Map	9
Plate 3: GPS Demarcation with Site Features	10
Plate 4: Soil Analytical Data and Associated Bar Charts	11
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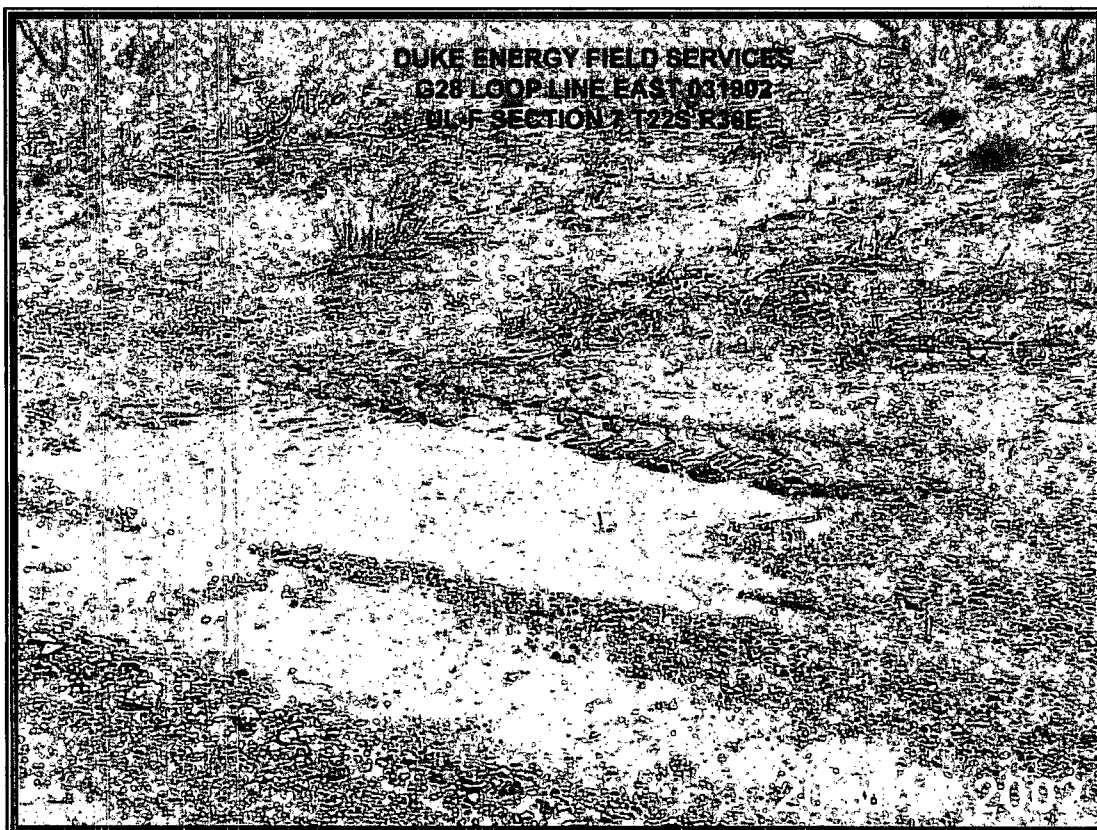


Plate 1: Site Location Map

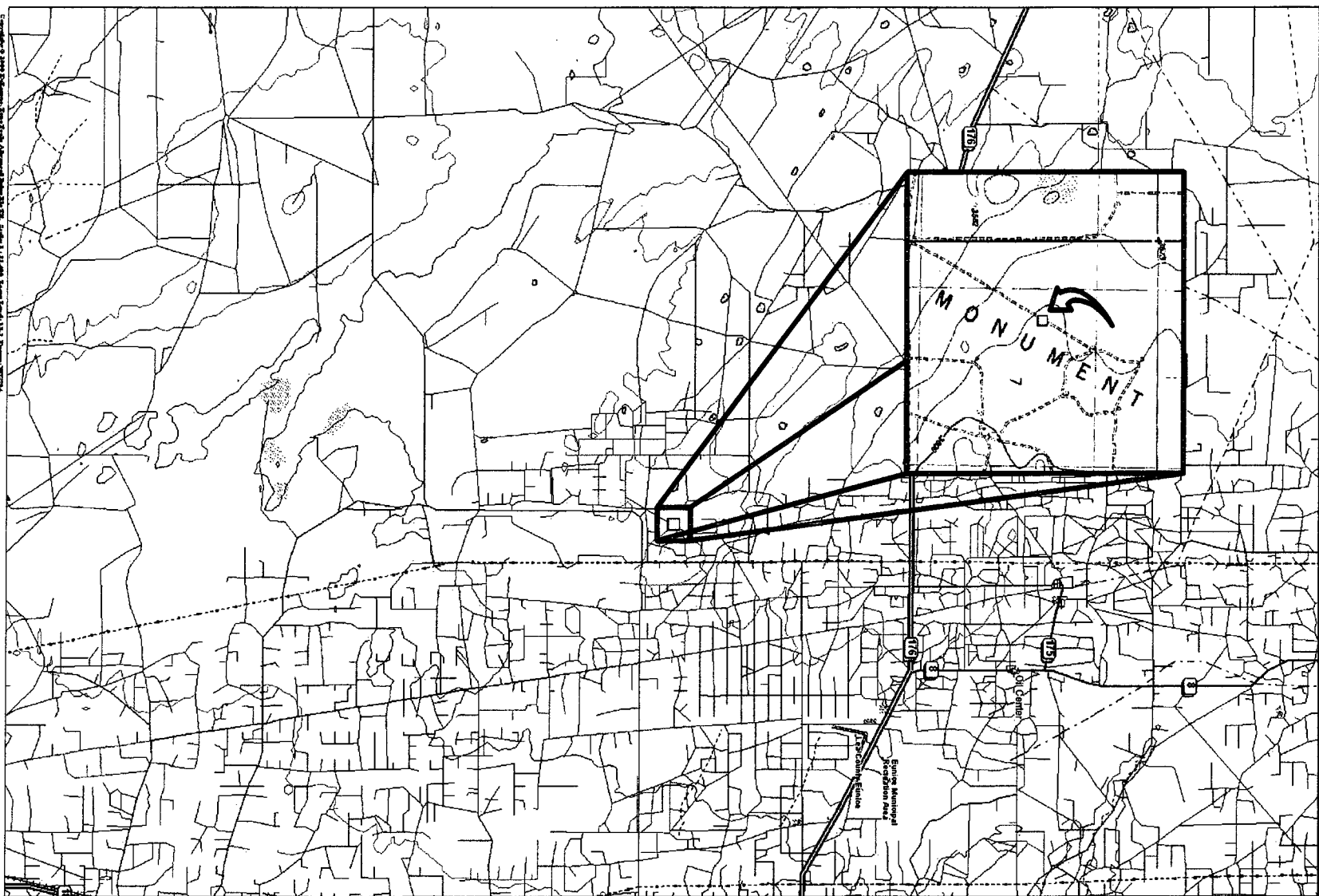


Plate 1
Release Site Location
Duke Energy Field Services
G-28 Loop Line East 031902

Lea County, New Mexico
UL-F Section 7 T22S R36E
N32° 24' 27.93" W103° 18' 28.14"
Elevation: 3583-ft amsl

DWG BY: John Good
March - 2003

REVISED:

SCALE:

0 5 Miles

SHEET
1 of 1



Plate 2: Site Topography Map

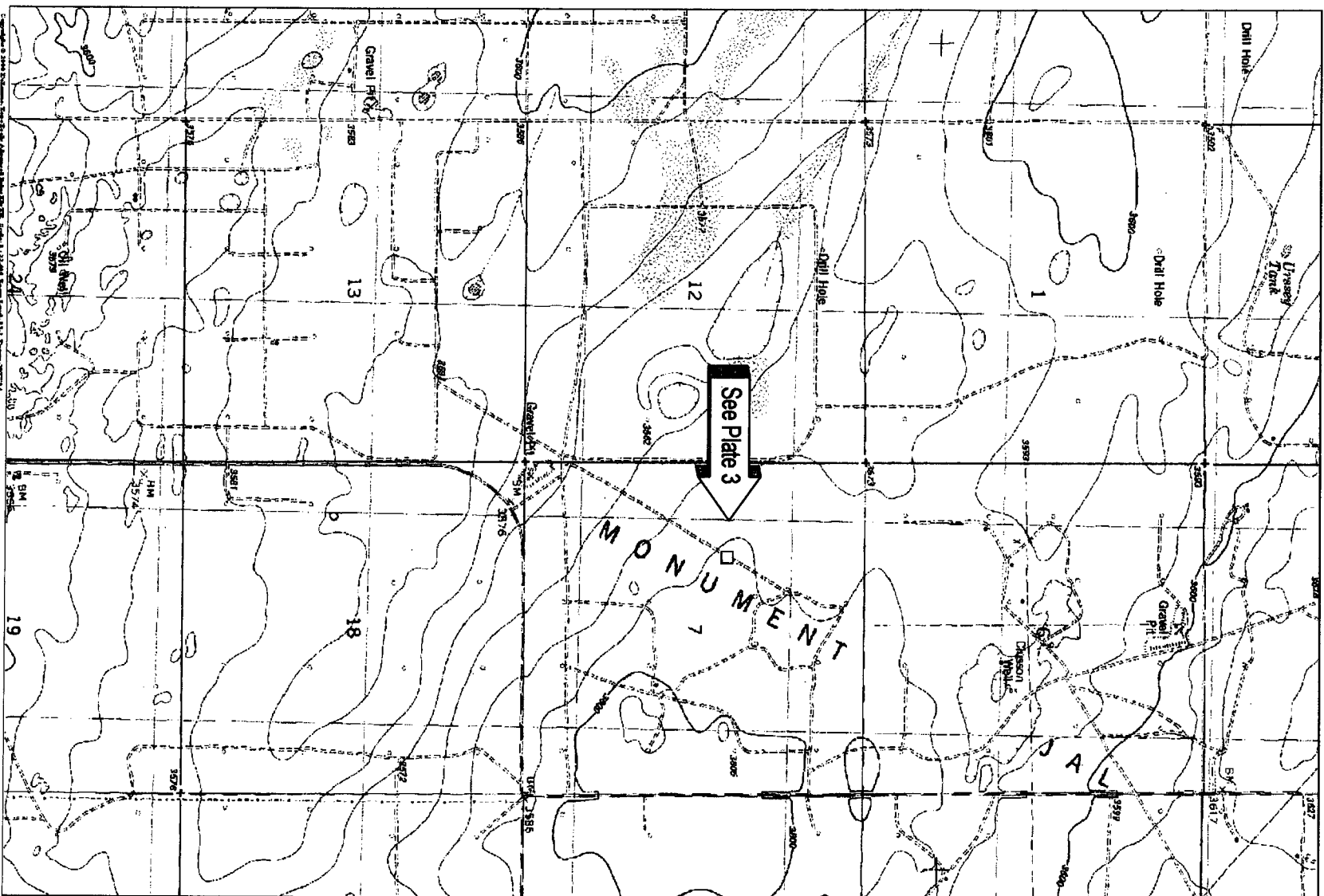


Plate 2
Release Site Topography
Duke Energy Field Services
G-28 Loop Line East 031902

Lea County, New Mexico
UL-F Section 7 T22S R36E
N32° 24' 27.93" W103° 18' 28.14"
Elevation: 3596-ft amsl



DWG BY: John Good	REVISED:	
March - 2003		
SCALE: 		SHEET 1 of 1

Plate 3: GPS Demarcation with Site Features

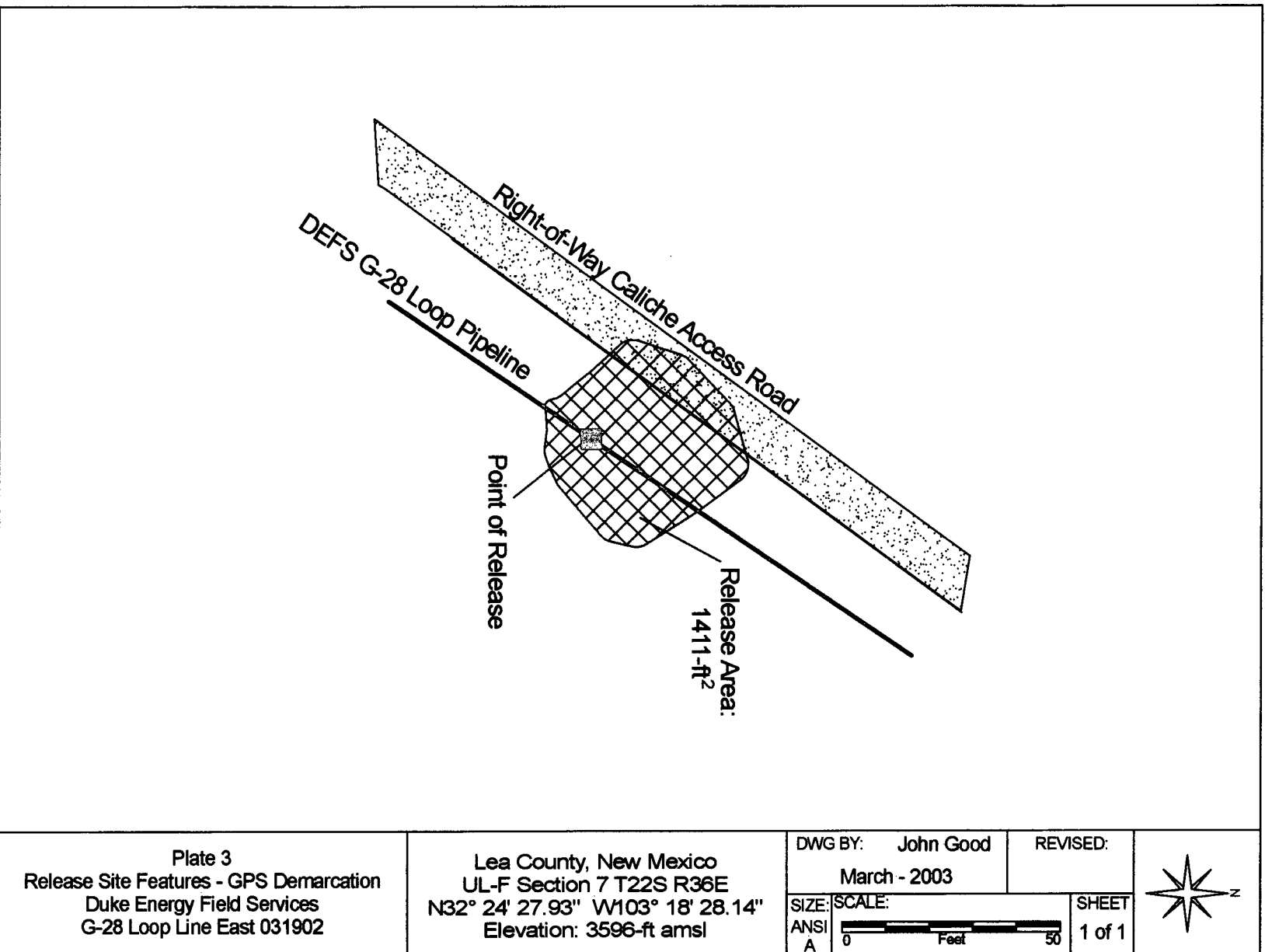


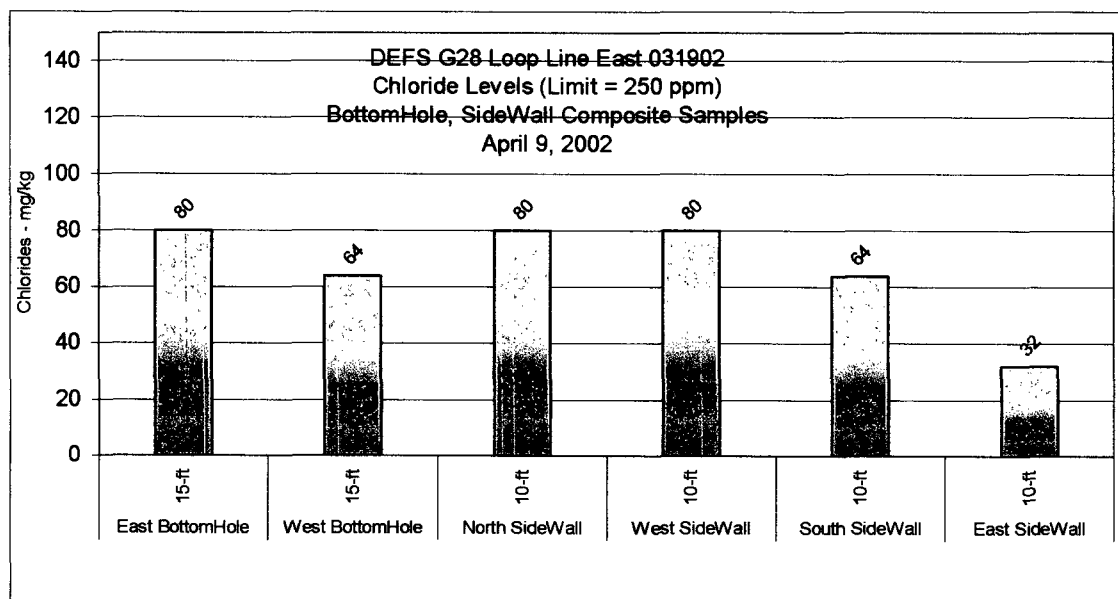
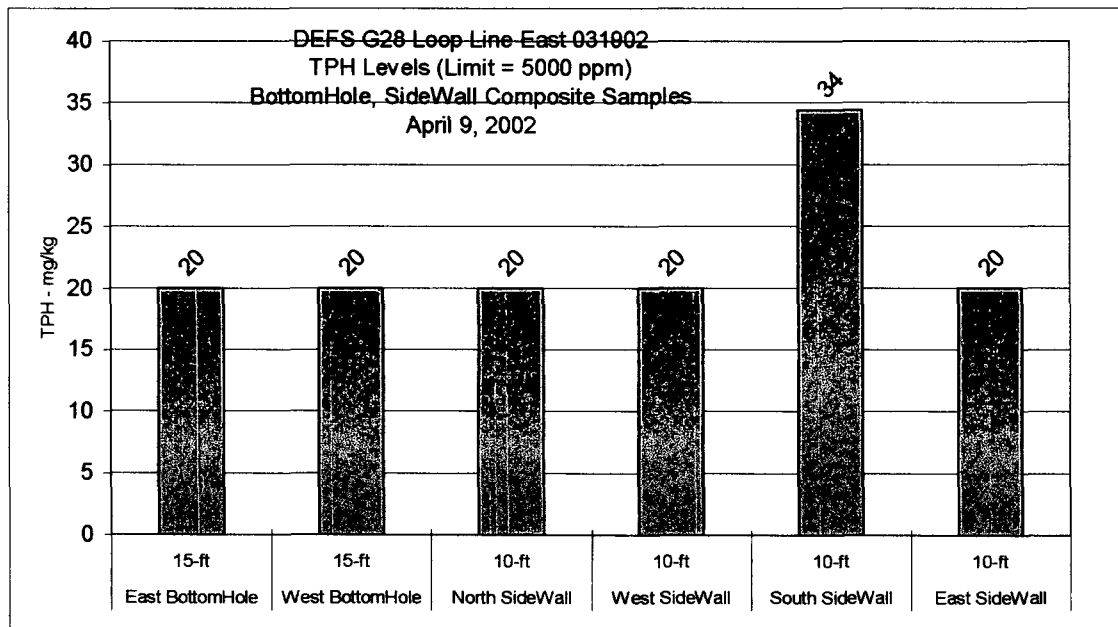
Plate 4 – Soil Analytical Data and Associated Bar Charts

Duke Energy Field Services - G28 Loop Line East 031902 - Excavation Sampling Results

Bold | highlighted cells indicate values in excess of the NMOCD remedial action guideline thresholds: TPH = 5000 mg/Kg; Benzene = 10 mg/Kg; BTEX = 50 mg/Kg; Cl = 250 mg/Kg; SO₄ = 600 mg/Kg

Sample Date	Excavation Sampling Area	Depth (ft - bgs ¹)	SAMPLE ID#	VOC ² ppm	GRO ³ mg/Kg	DRO ⁴ mg/Kg	TPH ⁵ mg/Kg	BTEX ⁶ mg/Kg	Benzene mg/Kg	Toluene mg/Kg	Ethyl Benzene mg/Kg	Total Xylenes mg/Kg	Cl mg/Kg	SO ₄ ⁷ mg/Kg
9-Apr	East BottomHole	15-ft	SDG28E4802EBH		10	10	20	0.030	0.005	0.005	0.005	0.015	80.0	
9-Apr	West BottomHole	15-ft	SDG28E4802WBH		10	10	20	0.030	0.005	0.005	0.005	0.015	64.0	
9-Apr	North SideWall	10-ft	SDG28E4802NSW		10	10	20	0.030	0.005	0.005	0.005	0.015	80.0	
9-Apr	West SideWall	10-ft	SDG28E4802WSW		10	10	20	0.030	0.005	0.005	0.005	0.015	80.0	
9-Apr	South SideWall	10-ft	SDG28E4802SSW		10	24	34	0.030	0.005	0.005	0.005	0.015	64.0	
9-Apr	East SideWall	10-ft	SDG28E4802ESW		10	10	20	0.030	0.005	0.005	0.005	0.015	32.0	

¹ bgs = below ground surface ² VOC = Volatile Organic Constituents; (note: 100 ppm Isobutylene calibration gas = 101 ppm)
³ GRO - Gasoline Range Organics (Detection Limit = 10 mg/Kg) ⁴ DRO - Diesel Range Organics (Detection Limit = 10 mg/Kg) ⁵ TPH - Total Petroleum Hydrocarbon (GRO+DRO)
⁶ BTEX = Sum of CoCs (Detection Limits = 0.005 mg/Kg; 0.015 mg/Kg) Note: Reported detection limits are considered "de minimus" values and are included in the TPH and BTEX summations.



Lab Analyses Reports and Chain-of-Custody Forms



ARDINAL LABORATORIES

PHONE (915) 873-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
ENVIRONMENTAL PLUS, INC.
ATTN: PAT McCASLAND
P.O. BOX 1558
EUNICE, NM 88231
FAX TO: (505) 394-2601

Receiving Date: 04/09/02
Reporting Date: 04/11/02
Project Owner: DUKE
Project Name: G28 EAST
Project Location: NOT GIVEN

Sampling Date: 04/09/02
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: AH
Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	GRO	DRO	CI*
		(C ₆ -C ₁₀) (mg/Kg)	(>C ₁₀ -C ₂₈) (mg/Kg)	(mg/Kg)
ANALYSIS DATE		04/10/02	04/10/02	04/10/02
H6665-1	SDG28E4802EBH	<10.0	<10.0	80
H6665-2	SDG28E4802WBH	<10.0	<10.0	64
H6665-3	SDG28E4802NSW	<10.0	<10.0	80
H6665-4	SDG28E4802WSW	<10.0	<10.0	80
H6665-5	SDG28E4802SSW	<10.0	24.4	64
H6665-6	SDG28E4802ESW	<10.0	<10.0	32
Quality Control		743	793	1040
True Value QC		800	800	1000
% Recovery		92.8	99.1	104
Relative Percent Difference		2.9	4.9	0

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CI'B

*Analyses performed on 1:4 w:v aqueous extracts.

Burgess A. Coole
Chemist

4/11/02
Date

H6665A.XLS
PLEASE NOTE: Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



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PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

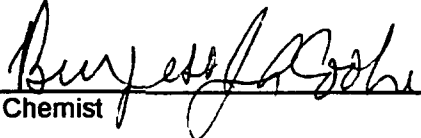
ANALYTICAL RESULTS FOR
ENVIRONMENTAL PLUS, INC.
ATTN: PAT McCASLAND
P.O. BOX 1558
EUNICE, NM 88231
FAX TO: (505) 394-2601

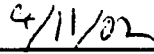
Receiving Date: 04/09/02
Reporting Date: 04/11/02
Project Owner: DUKE
Project Name: G28 EAST
Project Location: NOT GIVEN

Sampling Date: 04/09/02
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: AH
Analyzed By: BC

LAB NUMBER	SAMPLE ID	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE		04/10/02	04/10/02	04/10/02	04/10/02
H6665-1	SDG28E4802EBH	<0.005	<0.005	<0.005	<0.015
H6665-2	SDG28E4802WBH	<0.005	<0.005	<0.005	<0.015
H6665-3	SDG28E4802NSW	<0.005	<0.005	<0.005	<0.015
H6665-4	SDG28E4802WSW	<0.005	<0.005	<0.005	<0.015
H6665-5	SDG28E4802SSW	<0.005	<0.005	<0.005	<0.015
H6665-6	SDG28E4802ESW	<0.005	<0.005	<0.005	<0.015
Quality Control		0.105	0.108	0.109	0.311
True Value QC		0.100	0.100	0.100	0.300
% Recovery		105	108	109	104
Relative Percent Difference		5.4	8.0	4.7	3.8

METHOD: EPA SW-846 8260


Chemist


Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.

H6665B.XLS

Cardinal Laboratories Inc.

2111 Beechwood, Abilene, TX 79603
915-673-7001 Fax 915-673-7020

101 East Marland, Hobbs, NM 88240
505-393-2326 Fax 505-393-2476

Company Name		Environmental Plus Inc.		Bill To										Analysis Request																					
Project Manager		Pat McCasland		Environmental Plus Inc.										<div>CI</div> <div>TPH 8015 M</div> <div>BTEX 8021B</div>																					
Address		PO Box 1558																																	
City, State, Zip		Eunice, NM																																	
Phone#/Fax#		505-394-2870/505-394-2601																																	
Project #/Owner		Duke																																	
Project Name		G28 East																																	
Project Location																																			
Sampler Name		CODY MILLER																																	
LAB I.D.	SAMPLE I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						PRESERV.			SAMPLING																						
				GROUND WATER	WASTEWATER	SOIL	CUDE OIL	SLUDGE	OTHER:	ACID/BASE	ICE/COOL	OTHER	DATE	TIME																					
H66065-1	SDG28E4802EBH	C	1			X					X		4/9/02	740	X	X	X																		
-2	SDG28E4802WBH	C	1			X					X		4/9/02	750	X	X	X																		
-3	SDG28E4802NSW	C	1			X					X		4/9/02	800	X	X	X																		
-4	SDG28E4802WSW	C	1			X					X		4/9/02	810	X	X	X																		
-5	SDG28E4802SSW	C	1			X					X		4/9/02	820	X	X	X																		
-6	SDG28E4802ESW	C	1			X					X		4/9/02	830	X	X	X																		

Sampler Relinquished:		Date	4/9/02	Received By:		Fax Results To Pat McCasland 505-394-2601 REMARKS:	
Relinquished by:		Time		Received By: (lab staff)			
		Date	4/9/02				
		Time	4:00	Amy Hill			
Delivered by Sampler		Sample Cool & Intact		Checked By:			
		Yes No					

District I

1625 N. French Dr., Hobbs, NM 88240

District II

1301 W. Grand Avenue, Artesia, NM 88210

District III

1000 Rio Brazos Road, Aztec, NM 87410

District IV

1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141

Revised March 17, 1999

Submit 2 Copies to appropriate

District Office in accordance

with Rule 116 on back

side of form

Release Notification and Corrective Action

OPERATOR☐ Initial Report ☒ Final Report

Name of Company DUKE ENERGY FIELD SERVICES	Contact Paul Mulkey
Address 11525 W. Carlsbad Hwy. Hobbs, NM 88240	Telephone No. 505-397-5716
Facility Name G-28 Loop Line East	Facility Type Natural Gas Gathering Pipeline

Surface Owner State of New Mexico	Mineral Owner NA	Lease No. NA
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LOCATION OF RELEASE

Unit Letter F	Section 7	Township 22S	Range 36E	Feet from South Line 3156	Feet from West Line 1468	Longitude W103° 18' 28.11"	Latitude N32° 24' 27.93"	County: Lea
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NATURE OF RELEASE

Type of Release Natural Gas release and associated liquid components	Volume of Release 5-25 bbl	Volume Recovered 0 bbl
Source of Release Steel Pipeline - Natural gas gathering	Date and Hour of Occurrence Unknown	Date and Hour of Discovery 3/19/02
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? NA	
By Whom? NA	Date and Hour NA	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. NA	
If a Watercourse was Impacted, Describe Fully.* NA		

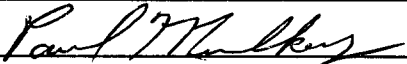
Describe Cause of Problem and Remedial Action Taken.*

Historical leak caused by internal pipeline corrosion. Pipeline repaired by DEFS.


Describe Area Affected and Cleanup Action Taken.*

1411-ft² surface area RCRA Exempt Non-hazardous contaminated soil (472-yd³) above remedial goals excavated and disposed of by EPI. Excavation was backfilled with clean material.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	<u>OIL CONSERVATION DIVISION</u>	
Printed Name: Paul Mulkey	Approved by District Supervisor:	
Title: Maintenance/Construction Supervisor	Approval Date:	Expiration Date:
Date: 3/31/03 Phone: 505-397-5716	Conditions of Approval: <input type="checkbox"/> Attached.	

Attach Additional Sheets If Necessary

		Incident Date and NMOCD Notified?	
		3/19/02	NA
SITE: G-28 Loop Line East		Assigned Site Reference #031902	
Company:		DUKE ENERGY FIELD SERVICES	
Street Address:		5805 East Highway 80	
Mailing Address:		11525 W. Carlsbad Hwy.	
City, State, Zip:		Hobbs, NM 88240	
Representative:		Paul Mulkey	
Representative Telephone:		505-397-5716	
Telephone:			
Fluid volume released (bbls):		5-25	Recovered (bbls): 0
>25 bbls: Notify NMOCD verbally within 24 hrs and submit form C-141 within 15 days.			
5-25 bbls: Submit form C-141 within 15 days (Also applies to unauthorized releases of 50-500 mcf Natural Gas)			
Leak, Spill, or Pit (LSP) Name:		#031902	
Source of contamination:		Steel Pipeline - Natural gas gathering	
Land Owner, i.e., BLM, ST, Fee, Other:		State of New Mexico Commissioner of Lands, Santa Fe, NM	
LSP Dimensions:		50' x 50' (GPS Site Diagram attached)	
LSP Area:		1,411 -ft ²	
Location of Reference Point (RP):			
Location distance and direction from RP:			
Latitude:		N32° 24' 27.93"	
Longitude:		W103° 18' 28.11"	
Elevation above mean sea level:		3596 -ft amsl	
Feet from South Section Line:		3156	
Feet from West Section Line:		1468	
Location - Unit and 1/4 1/4:		UL- F SE 1/4 of NW 1/4	
Location - Section:		7	
Location - Township:		22S	
Location - Range:		36E	
Surface water body within 1000' radius of Site:		0	
Surface water body within 1000' radius of Site:		0	
Domestic water wells within 1000' radius of Site:		0	
Domestic water wells within 1000' radius of Site:		0	
Agricultural water wells within 1000' radius of Site:		0	
Agricultural water wells within 1000' radius of Site:		0	
Public water supply wells within 1000' radius of Site:		0	
Public water supply wells within 1000' radius of Site:		0	
Depth (ft) from land surface to ground water (DG):		195	
Depth (ft) of contamination (DC):		15	
Depth (ft) to ground water (DG - DC = DtGW):		180	
1. Ground Water		2. Wellhead Protection Area	
If Depth to GW <50 feet: 20 points		If <1000' from water source, or, <200' from private domestic water source: 20 points	
If Depth to GW 50 to 99 feet: 10 points		If >1000' from water source, or, >200' from private domestic water source: 0 points	
If Depth to GW >100 feet: 0 points			
Ground water Score: 0		Wellhead Protection Area Score: 0	
Site Rank (1+2+3) = 0		Surface Water Score: 0	
Total Site Ranking Score and Acceptable Concentrations			
Parameter	20 or >	10	0
Benzene ¹	10 ppm	10 ppm	10 ppm
BTEX ¹	50 ppm	50 ppm	50 ppm
TPH	100 ppm	1000 ppm	5000 ppm
¹ 100 ppm field VOC headspace measurement may be substituted for lab analysis			

District I

1625 N. French Dr., Hobbs, NM 88240

District II

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State of New Mexico**Energy Minerals and Natural Resources**

Form C-141

Revised March 17, 1999

Oil Conservation Division**1220 South St. Francis Dr.****Santa Fe, NM 87505**

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Signature: <i>Paul Mulkey</i>	OIL CONSERVATION DIVISION	
Printed Name: Paul Mulkey	Approved by District Supervisor:	
Title: Maintenance/Construction Supervisor	Approval Date:	Expiration Date:
Date: 4/2/03 Phone: 505-397-5716	Conditions of Approval:	<input type="checkbox"/> Attached

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