

SITE INVESTIGATION, REMEDIATION AND FINAL C-141 CLOSURE DOCUMENTATION

O-LINE RELEASE SITE DEFS REF: 130003

UL-J (NW⁴ OF THE SE⁴) OF SECTION 19 T17S R32E ~3.5 MILES SOUTHWEST OF MALJAMAR

LEA COUNTY, NEW MEXICO



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Project Summary

Site Specific:

- Company Name: Duke Energy Field Services
- Facility Name: O-Line Natural Gas Gathering Pipeline
- Project Reference 130003
- Company Contacts: Paul Mulkey
- Site Location: WGS84 N32° 49' 3.673"; W103° 48' 8.156"
- Legal Description: Unit Letter J, (NW¼ of the SE¼), Section 19, T17S, R32E
- General Description: approximately 3.5-miles southwest of Maljamar, New Mexico
- Elevation: 3,935-ft amsl Depth to Ground Water: >100-ft
- Land Ownership: BLM (leased by Norman Caswell)
- EPI Personnel: Project Consultant Iain Olness
 - Site Foreman Eddie Joe Harper

Release Specific:

- Product Released: Natural Gas & NGL
- ◆ Volume Released: ≈20-bbl reported Volume Recovered: ≈15-bbl
- Time of Occurrence: 20-May-04 Time of Discovery: 20-May-04
- **Release Source**: 8" steel NG pipeline; integrity lost due to internal corrosion; repaired by clamping with ultimate replacement of section.
- Initial Surface Area Affected: 1,075-ft²

Remediation Specific:

- Final Vertical extent of contamination: 16-ft bgs; Remaining depth to ground water: >100-ft
- Water wells within 1,000-ft: 0
 Surface water bodies within 1,000-ft: 0
- NMOCD Site Ranking Index: 0 points (>100-ft to top of water table)
- Remedial goals for Soil: TPH 5,000 mg/kg; BTEX 50 mg/kg; Benzene 10 mg/kg; Chlorides 250 mg/kg; Sulfates 600 mg/kg
- RCRA Waste Classification: Exempt
- Remediation Option Selected: a) Excavation of contaminated soil above NMOCD remedial goals; b) laboratory analyses to confirm removal of soil impacted of NMOCD remedial thresholds; c) blend excavated soil with surrounding clean soil and backfill the excavation.
- Disposal Facility: Not Applicable
 Volume disposed of: 0-yd³
- Project Completion Date: 16 June 2004
- Additional Commentary: None

1.0 Introduction & Background

This report addresses the site investigation and remediation of the Duke Energy Field Services (DEFS) "O-Line" 8-inch natural gas gathering line remediation site. On May 20, 2004, Environmental Plus, Inc. (EPI) was notified by DEFS regarding a recently discovered natural gas and associated natural gas liquid (NGL) release along the O-Line. This site is located approximately 3.5 miles southwest of Maljamar, Lea County, New Mexico (*reference Figure 1*). The initial C-141 Form submitted to the New Mexico Oil Conservation Division (NMOCD) on June 1, 2004, reports the release volume as approximately 20-barrels with 15-barrels recovered. EPI performed GPS surveying, photography and characterization of the site on June 1, 2004. The initial site consisted of an approximate 1,075 square feet (ft²) visibly affected surface area (*reference Figure 3*).

Initial activities at the site consisted of delineating the extent of contamination via test trenches. One trench was excavated in the north/south direction and one in the east/west direction. Samples were collected from the trenches and analyzed in the field for the presence of organic vapors utilizing an UltraRae photoionization detector (PID) equipped with a 10.6 electron-volt (eV) lamp. In addition, the samples were submitted for laboratory confirmation to ensure the extents of contamination had been delineated.

Once the extents of contamination had been delineated, remediation activities commenced. Remediation of this site consisted of excavation and blending of approximately 1,500 cubic yards (yds³) of contaminated soil from what was ultimately a 2,675-ft² excavation extending to 15-feet below ground surface (bgs). The contaminated soil was blended on site with clean soil obtained from the right-of-way. The excavation bottom(s) and sidewalls were sampled on June 9, 2004 and analyzed in the field for the presence of organic vapors utilizing an UltraRae photoionization detector (PID) equipped with a 10.6 electron volt (eV) lamp and submitted for laboratory quantification. Analytical results indicated benzene, toluene, ethylbenzene and total xylene (BTEX) concentrations above the NMOCD remedial threshold of 50 parts per million (ppm) remained in the bottom of the excavation. Excavation activities resumed and another sample was collected from approximately two feet below the impacted sample. Analytical results for this sample indicated all contaminant concentrations were less than the NMOCD remedial thresholds. The construction phase of the site remediation commenced on June 3, 2004 and was completed with backfilling and contouring on June 16, 2004.

This release site is located in Unit Letter J, (NW¹/₄ of the SE¹/₄), Section 19, T217, R32E, N32° 49' 3.673" and W103° 48' 8.156". The site is approximately 3.5-miles southwest of Maljamar, New Mexico. The property is owned by the Bureau of Land Management (BLM) and leased by Norman Caswell *(reference Figures 1 through 3)*.

2.0 Site Description

2.1 Geological Description

<u>The United States Geological Survey (USGS) Ground-Water Report 6, "Geology and</u> <u>Ground-Water Conditions in Southern Lea County, New Mexico," A. Nicholson and A.</u> <u>Clebsch, 1961</u>, 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 Plain physiographic subdivision, described by Nicholson & Clebsch as an area "underlain by a hard caliche surface and is almost entirely covered by reddish-brown dune sand". The thickness of the sand cover ranges from 2-5 feet in most areas to as much as 20-30 feet in drift areas.

2.2 Ecological Description

The area is typical of the Upper Chihuahuan Desert Biome consisting primarily of hummocky sand hills covered with Harvard Shin Oak (*Querqus 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 Rats, Deer Mouse, 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.

2.3 Area Ground Water

The unconfined groundwater aquifer at this site is projected to be >220-ft bgs based on limited water depth data obtained from the New Mexico State Engineers Office data base and information provided by the landowner. Ground water gradient in this area is generally to the east-southeast.

2.4 Area Water Wells

All recorded wells are greater than 1,000 horizontal feet from the site.

2.5 Area Surface Water Features

No surface water bodies exist within 1,000 horizontal feet of the site.

3.0 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 groundwater 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)
- <u>Unlined Surface Impoundment Closure Guidelines (February 1993)</u>

Acceptable thresholds for contaminants/constituents of concern (CoC), i.e., TPH^{8015m}, benzene, and the mass sum of benzene, toluene, ethylbenzene, and total xylenes (BTEX), were 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 groundwater 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 Wa	ater	2. Wellhead Pro	tection Area	3. Distance to Surface Water
Depth to GW points	/ <50 feet: 20	lf <1,000' from <200' from priv	water source, or; /ate domestic water	<200 horizontal feet: <i>20 points</i>
Depth to GW 10 points	/ 50 to 99 feet:	source: 20 poi	nts	200-1,000 horizontal feet: 10 points
Depth to GW 0 points	/ >100 feet:	If >1,000' from >200' from priv source: <i>0 poin</i>	water source, or; vate domestic water <i>ts</i>	>1,000 horizontal feet: <i>0 points</i>
Ground Wat	er Score = 0	Wellhead Prote	ection Score= 0	Surface Water Score= 0
Site Rank (1	+2+3) = 0 + 0 + 0	= 0 points		
Total Site Ra	anking Score and	d Acceptable Re	medial Goal Concent	rations
Parameter	20 or >		10	0
Benzene ¹	10 ppm		10 ppm	10 ppm
BTEX ¹	50 ppm		50 ppm	50 ppm
ТРН	100 ppm		1,000 ppm	5,000 ppm

¹ A field soil vapor headspace measurement of 100 ppm may be substituted for a laboratory analysis of the benzene and BTEX concentration limits.

4.0 Subsurface Soil Investigation

The vertical extent of hydrocarbon contamination at the site was determined with test excavations of the release area associated with the point of release (POR) to depths of 8-ft bgs on June 3, 2004. The lateral extent of contamination was determined with measurements of organic vapor concentrations as the excavation progressed outwardly from the POR. Organic vapor concentrations were measured in the field utilizing an UltraRae PID equipped with a 10.6 eV lamp.

Upon delineating the extents of impacted soil, composite soil samples were collected from the base and sidewalls of the excavation and analyzed in the field to verify remedial limits had been achieved. Organic vapor concentrations ranged from 6.2 to 394 ppm with an average concentration of 112 ppm *(reference Table 1)*. In addition, samples were collected and submitted to an independent laboratory for quantification of GRO, DRO, BTEX, chlorides and sulfates. Analytical results indicated concentrations for all analytes were below the NMOCD remedial thresholds for all samples, with the exception chloride in the sample obtained from the "south" trench. Chloride concentrations for this sample were reported at 2,000 mg/Kg *(reference Table 1)*.

5.0 Ground Water Investigation

The projected depth to ground water at this site is >220-ft bgs. Excavation of the site was to a maximum depth of sixteen feet. Final field analyses for soil samples collected from the base of the excavation indicated organic vapor concentrations of <300 ppm *(reference Table 1)*. In addition, analytical results for samples collected from the sidewalls and base of the excavation indicated concentrations below NMOCD remedial thresholds, with the exception of chloride in the sample

collected from the south sidewall of the excavation. Chloride concentrations for this sample were reported at 2,239 mg/Kg (*reference Table 1*).

The excavation was backfilled with the excavated material after it had been blended to below NMOCD remedial thresholds with clean soil obtained from the right-of-way. Based on the treatment of impacted soil to below remedial goal concentrations and adequate depth to ground water, there is no need for further groundwater investigation at this site.

6.0 Remediation Process

Remediation of the site commenced on June 4, 2004 and continued through June 16, 2004. Remedial activities at the site consisted of excavation and blending of 1,500 yd³ of NGL contaminated soil from the site. The contaminated soil was blended with clean soil to below NMOCD remedial thresholds obtained from the right-of-way and verified via laboratory analyses of samples SDEOL61004BC 0-50 and SDEOL61004 50-100 (*reference Table 1 and Appendix 1*). After field analyses of soil samples collected from the sidewalls and base of the excavation indicated remedial goals had been achieved, the excavation was backfilled with the blended soil. The backfilling and contouring of the site was completed on June 16, 2004.

7.0 Closure Justification

This report documents successful treatment of impacted soil above the remedial thresholds discussed in Section 3 above and confirmed via laboratory analyses for this release site. The only exception was the sample obtained from the south sidewall, which indicated chloride concentrations above the NMOCD remedial thresholds. However, due to the depth to groundwater (i.e., >100 feet), it is suggested that the remaining impacted soil will not impact the groundwater and can be left in place. The impacted soil was excavated and blended with clean soil obtained from the right-of-way and returned to the excavation. 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 and issue a *Site Closure Letter*.

FIGURES









TABLES

TABLE 1

Summary of Excavation Analytical Results

O-Line - Ref#130003

Sample ID	Sample Date	Sample Location	Field Analysis	Benzene	Toluene	Ethylbenzene (meKa)	Total Xylenes	Total BTEX	GRO (C6-C10) (02/50)	DRO (>C10-C28) (199750)	TPH	Chloride market	Sulfate (ma/Ka)
SDEOL630117	- 3-Jun-0 4	Point of Release - 17'	394	0.005	0.090	0.357	0.695	1.15	17.9	267	285	208	214
SDBOLGJO4NTN	3-Jun-04	North Trench - 8'	64.6	<0.005	<0.005	<0.005	⊲0.015	<0.030	<10.0	20.6	20.6	48	41
SDEOLA304WT8	3-Jun-04	West Trench - 8'	76.7	<0.005	<0.005	<0.005	<0.015	⊲0.030	<10.0	242	242	80	18
SDEOL6304ET8	3-Jun-04	East Trench- 8'	17.6	<0.005	<0.005	<0.005	⊲0.015	<0.030	<10.0	<10.0	<20.0	96	195
SDEOL6304ST8	3-Jun-04	South Trench - 8'	6.2	<0.005	<0.005	<0.005	<0.015	<0.030	<10.0	<10.0	<20.0	2,000	136
CDEOL6904NSW14	9-Jun-04	North Sidewall - 14'	48.5	<0.005	0.072	0.049	0.179	0.300	<10.0	333	333	МА	NA
CDEOL6904WSW14	9-Jun-04	VVCSE UILLOWBIT	12.2	<0.005	<0.005	<0.005	<0.015	<0.030	<10.0	<10.0	<20.0	NA	NA
CDEOL6904SSW 14	9-Jun-04	South Sidewall - 14'	25.7	⊲0.005	<0.005	<0.005	<0.015	⊲0.030	<10.0	<10.0	<20.0	2,239	NA
CDEOL6904ESW 14	9-Jun-04	East Sidewall - 14	44.2	<0.005	<0.005	<0.005	<0.015	<0.030	<10.0	<10.0	<20.0	NA	NA
CDEQL6904BH3P	9-Jun-04	Bottomhole - 3 Point Composite	281	<0.005	0.005	0.015	0.037	0.057	<10.0	337	337	м	МА
CDEOL6904BH	9-Jun-04	Bottomhole - 15'	1,055	3.51	37.3	15.8	28.2	84.8	831	3,410	4,241	NA	NA
到达1.61004图12(16)	10-Jun-04	Bottomhole - 16	216	<0.005	<0.005	⊲0.005	<0.015	<0.030	<10.0	13.3	13.3	NA	NA
SDEOL61004BC 0-50	10-Jun-04	Blending Cell	387	<0.005	0.022	0.057	0.290	0.369	<10.0	108	108	NA	NA
SDEOL61004BC 50-100	10-Jun-04	Blending Cell	82.7	<0.005	0.006	<0.005	0.048	0.054	<10.0	76.4	76.4	NA	NA
NMOCD Remedial T	bresholds			10				50			5,000	250	

BTEX = Benzene, Tohuene, Ethylbenzene, Total Xylenes

GRO = Gasoline Range Organics

DRO = Diesel Range Organics

TPH = Total Petroleum Hydrocarbons

ppm = parts per million, which is equivalent to milligrams per kilogram (mg/Kg)

mg/Kg = milligrams per kilogram, which is equivalent to parts per million (ppm)

NA = Not Analyzed

Red, bold values are in excess of NMOCD remedial thresholds

APPENDIX I

LABORATORY ANALYTICAL REPORTS AND CHAIN-OF-CUSTODY FORMS



PHONE (325) 673-7001 · 2111 BEECHWOOD · ABILENE, TX 79603

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

ANALYTICAL RESULTS FOR ENVIRONMENTAL PLUS, INC. ATTN: IAIN OLNESS P.O. BOX 1558 EUNICE, NM 88231 FAX TO:

Receiving Date: 06/03/04 Reporting Date: 06/05/04 Project Owner: DUKE ENERGY Project Name: DUKE Project Location: O-LINE Sampling Date: 06/03/04 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: BC Analyzed By: BC

LAB NO. SAMPLE ID	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE	06/04/04	06/04/04	06/04/04	06/04/04
H8786-1 SDEOL630417	0.005	0.090	0.357	0.695
H8786-2 SDEOL6304NT8	< 0.005	< 0.005	<0.005	<0.015
H8786-3 SDEOL6304WT8	< 0.005	< 0.005	<0.005	<0.015
H8786-4 SDEOL6304ET8	< 0.005	< 0.005	<0.005	<0.015
H8786-5 SDEOL6304ST8	< 0.005	<0.005	<0.005	<0.015
Quality Control	0.096	0.098	0.092	0.274
True Value QC	0.100	0.100	0.100	0.300
% Recovery	95.5	97.7	92.3	91.2
Relative Percent Difference	2.7	3.7	3.7	3.9

METHOD: EPA SW-846 8260

ettiff ash

6/5/04 Date

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ANALYTICAL RESULTS FOR ENVIRONMENTAL PLUS, INC. ATTN: IAIN OLNESS P.O. BOX 1558 EUNICE, NM 88231 FAX TO:

Receiving Date: 06/03/04 Reporting Date: 06/05/04 Project Owner: DUKE ENERGY Project Name: DUKE Project Location: O-LINE Sampling Date: 06/03/04 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: BC Analyzed By: BC/AH

		GRO	DRO	
		(C ₆ -C ₁₀)	(>C ₁₀ -C ₂₈)	Cl*
LAB NO.	SAMPLE ID	(mg/Kg)	(mg/Kg)	(mg/Kg)
ANALYSIS	DATE	06/04/04	06/04/04	06/04/04
H8786-1	SDEOL630417	17.9	267	208
H8786-2	SDEOL6304NT8	<10.0	20.6	48
H8786-3	SDEOL6304WT8	<10.0	242	80
H8786-4	SDEOL6304ET8	<10.0	<10.0	96
H8786-5	SDEOL6304ST8	<10.0	<10.0	2000
Quality Cor	ntrol	790	785	950
True Value	QC	800	800	1000
% Recover	У	98.8	98.2	95.0
Relative Pe	ercent Difference	0.9	7.2	6.0

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CI'B *Analyses performed on 1:4 w:v aqueous extracts.

Well ff Cooke

5/0Cl Date

H8786A.XLS

PLEASE NOTE: Ltability 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 writin thirty (30) days after competition of the applicable service. In no event shall Cardinal be liable for incidential or consequential damages, including, whithout ilmitation, business interruptions, loss of use, or loss of profits incred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hareunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



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ANALYTICAL RESULTS FOR ENVIRONMENTAL PLUS, INC. ATTN: IAIN OLNESS P.O. BOX 1558 EUNICE, NM 88231 FAX TO: (505) 394-2604

Receiving Date: 06/03/04 Reporting Date: 06/08/04 Project Owner: DUKE ENERGY Project Name: DUKE Project Location: O-LINE Analysis Date: 06/08/04 Sampling Date: 06/03/04 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: BC Analyzed By: AH

LAB NUMBER	SAMPLE ID	Sulfate
		(mg/Kg)
H8786-1	SDEOL630417	214
H8786-2	SDEOL6304NT8	41
H8786-3	SDEOL6304WT8	18
H8786-4	SDEOL6304ET8	195
H8786-5	SDEOL6304ST8	136
	· · ·	·
Quality Control		48.21
True Value QC		50.00
% Recovery		96.4
Relative Percent	Difference	6.2

METHOD: EPA 600/4-79-020 375.4

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† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476.



PHONE (325) 673-7001 · 2111 BEECHWOOD · ABILENE, TX 79603

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

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

Receiving Date: 06/09/04 Reporting Date: 06/10/04 Project Owner: DUKE ENERGY Project Name: NOT GIVEN Project Location: O-LINE Sampling Date: 06/09/04 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: BC Analyzed By: BC

		GRO	DRO			ETHYL	TOTAL
LAB NO.	SAMPLE ID	(C ₆ -C ₁₀)	(>C ₁₀ -C ₂₈)	BENZENE	TOLUENE	BENZENE	XYLENES
		(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)
ANALYSIS	S DATE:	06/09/04	06/09/04	06/09/04	06/09/04	06/09/04	06/09/04
H8805-1	CDEOL6904NSW 14	<10.0	333	< 0.005	0.072	0.049	0.179
H8805-2	CDEOL6904WSW 14	<10.0	<10.0	< 0.005	< 0.005	< 0.005	<0.015
H8805-3	CDEOL6904SSW 14	<10.0	<10.0	< 0.005	< 0.005	< 0.005	< 0.015
H8805-4	CDEOL6904ESW 14	<10.0	<10.0	< 0.005	< 0.005	< 0.005	<0.015
H8805-5	CDEOL6904BH 3P	<10.0	337	<0.005	0.005	0.015	0.037
H8805-6	CDEOL6904BH*	831	3410	3.51	37.3	15.8	28.2
Quality Co	ontrol	731	799	0.103	0.099	0.093	0.271
True Valu	e QC	800	800	0.100	0,100	0.100	0.300
% Recove	Iry	91.4	99.9	103	99.4	93.4	90.4
Relative P	Percent Difference	2.4	2.6	7.4	1.7	1.2	0.8

METHODS: TPH GRO & DRO - EPA SW-846 8015 M; BTEX - SW-846 8260. *BTEX run on 06/10/04 as per IO verbal instructions.

ATU Burgess

Date

H8805A.XLS

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

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

Receiving Date: 06/09/04 Reporting Date: 06/10/04 Project Owner: DUKE ENERGY Project Name: NOT GIVEN Project Location: O-LINE Analysis Date: 06/10/04 Sampling Date: 06/09/04 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: BC Analyzed By: AH

LAB NUMBER

R SAMPLE ID

Cl⁻ (mg/Kg)

H8805-3 C	DEOL6904SSW 14	2239
Quality Control		1020
True Value QC	······	1000
% Recovery		102
Relative Percent Diffe	rence	1.0

METHOD: Standard Methods 4500-Cl⁻B Note: Analysis performed on a 1:4 w:v aqueous extract.

emist

Date

PLEASE NOTE: Liability and Damages. Cardina'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 walved unless made in writing and received by Cardinal writin thirty (30) days after completion of the applicable service300 havent shall Cardinate 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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† Cardinal cannot accept verbal changes. Please fax written changes to (915) 673-7020.



PHONE (325) 673-7001 · 2111 BEECHWOOD · ABILENE, TX 79603

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

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

Receiving Date: 06/11/04 Reporting Date: 06/14/04 Project Owner: DUKE ENERGY Project Name: NOT GIVEN Project Location: NOT GIVEN Sampling Date: 06/10/04-06/11/04 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: BC Analyzed By: BC

	GRO	DRO			ETHYL	TOTAL
LAB NO. SAMPLE ID	(C ₆ -C ₁₀ )	(>C ₁₀ -C ₂₈ )	BENZENE	TOLUENE	BENZENE	XYLENES
	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)
ANALYSIS DATE:	06/14/04	06/14/04	06/14/04	06/14/04	06/14/04	06/14/04
H8820-1 SDEOL61004BC 0-50	<10.0	108	< 0.005	0.022	0.057	0.290
H8820-2 SDEOL61004BC 50-100	<10.0	76.4	< 0.005	0.006	< 0.005	0.048
H8820-3 SDEOL61004BH2 (16)	<10.0	13.3	<0.005	<0.005	<0.005	<0.015
				••••••••••••••••••••••••••••••••••••••		
Quality Control	804	793	0.104	0.107	0.101	0.295
True Value QC	800	800	0.100	0.100	0.100	0.300
% Recovery	101	99.2	104	107	101	98.2
Relative Percent Difference	1.6	1.1	1.5	3.8	0.5	3.6

METHODS: TPH GRO & DRO - EPA SW-846 8015 M; BTEX - SW-846 8260.

Burgess

6/14/04

Date

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Company Name:	DUKE				ينج نشاك								ILL TO				ANA	LYSIS	REQI	JEST		
Project Manager:	PAUL Mal	1/24							P	P.O.	<b>#</b> :		······································			1	[	T				
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† Cardinal cannot accept verbal changes. Please fax written changes to (915) 673-7020.

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### **APPENDIX II**

### **PROJECT PHOTOGRAPHS**



Photo #1: Release area, looking easterly along the pipeline. Notice soil staining in bottom of excavation.



Photo #2: Release area, looking northerly. Notice soil staining in central portion of the photograph.



Photo #3: Excavation, looking northerly.



Photo #4: Excavation, looking easterly.



Photo #5: Site graded and contoured, looking westerly.



Photo #6: Site graded and contoured, looking westerly.

### **APPENDIX III**

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# SITE INFORMATION AND METRICS FORM AND FINAL NMOCD C-141 FORM

Duke Energy Field Services Site	Incident Date: May 20, 2004 @ 1300	NMOCD Notified: May 20: 2004 @ 1345									
Site: O Lina	Assigned	Site Reference #: 130003									
Company: Duke Engine Field Services											
Company. Dave chergy richt betwies											
DIFEL AUDIESS:											
Maning Aduress: 11020 West Carlsoad HighWay											
Ulty, State, zap: Hodos, New Mexico 88240											
kepresentative: raul Mulkey											
kepresentative relephone: (303) 39/-3710											
Finice volume released (bbis): ~ 20 barrels [Kecovered (bbis): ~ 15 barrels											
>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 unanthorized releases of 50-500 mcf Natural Gas)											
Leak, Spill, or Pit (LSP) Name: O Line											
Source of contamination: 8" Steel Pipeline											
Land Owner, i.e., BLM, ST, Fee, Othe	r: Bureau of Land Manage	nent - Leased by Norman Casw	ell								
LSP Dimensions: 54 feet by 20 feet	<u> </u>										
LSP Area: ≈1.075 ft ²											
Location of Reference Point (RP):											
Location distance and direction from I	RP:										
Latitude: N 32º 49' 3.673"	<u> </u>	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·								
Longitude: W 103º 48' 8 156"											
Elevation above mean sea level:											
Feet from South Section Line:											
Feet from West Section Line											
Location-Unit or 1214: NW1/4 of the S	EVA Unit T	etter. T									
Location Section: 19	2074 Chitch										
Location Township: T178	Location Townshin: 1179										
Location- Range: R32F											
Docatione Range. N.225											
Surface water body within 1000 ( radi	ne of cites none										
Domestic water walls within 1000' rad	ins of site, none										
Agricultural water wells within 1000' au	radius of site: none	·····	·····								
Public water wells within 1000	radius of sites mana										
Fubic water supply wens within 1000	Tadius of site: none	entel manfe an									
Depth af and surface to ground wa	ter (DG): >100 below gro	und surface									
Deput of contamination (DC): Unknow											
Depin to ground water (DG - DC = D	<b>GW):</b> > 100										
I. Ground water	2. Wellhead Pro	ection Area 3. Dista	unce to Surface Water Body								
II Depin to GW <50 feet: 20 points	11 < 1,000 from water so	tree, or; $< 200^{\circ}$ trom $\leq 200^{\circ}$ hori	zontal teet: 20 points								
II Depth to GW 50 to 99 feet: 10 points	private domestic water s	urce: 20 points 200-100 h	iorizontal feet: 10 points								
If Depth to GW >100 feet: 0 points	If >1,000' from water source, or, >200' $>1.000$		000 horizontal feet: 0 noints								
	from private domestic w	ter source: 0 points	1,000 Horizontal Icot. V points								
Ground water Score = 0	Wellhead Protection Are	a Score= 0 Surface W	ater Score= 0								
Site Rank $(1+2+3) = 0$											
Total Site Ranking Score and Acceptable Concentrations											
Parameter >19	10	19	0-9								
Benzene ¹ 10 ppm	10	pm	10 ppm								
BTEX ¹ 50 ppm	50	pm	50 ppm								
TDU TO TO THE TO	1.00		E 000								
1Pm IVU ppm	1,00	ppm	a,ooo ppm								

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

Form C-141 Revised March 17, 1999

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

#### **Release Notification and Corrective Action**

	OPERATO	R			Ľ	Initial Report	🛛 Final Re	eport	
Name	Name of Company				Contact	-		*	
Duke F	Energy Field Ser	vices			Paul Mulke	у			
Addre	Address			Telephone No.					
11525	West Carlsbad I	Highway Hobbs, 1	New Mexico	88240	(505) 397-5	716			
Facilit	y Name				Facility Ty	pe			
O Line	O Line				8" Steel Pipeline				
Surfac	e Owner			Mineral Ow	/ner Lease No.				
Bureau	of Land Manag	gement - Leased b	y Norman						
Caswe	11		-						
			LOC	CATION OF	RELEASE				
Unit	Section	Township	Range	Feet from the	North/South	Feet from the East/We	st County:	Lea	
Letter	19	T175	R32E	Line		Line	Lat. N	32° 49' 3.673"	
J							Lon. W 103° 48' 8.156"		
NATIDE OF DELEASE									
Type of	f Release		1421		Volume of Rel	ease	Volume Rec	overed	
Natural	Gas Pipeline Flui	ids			20 barrels barr	rels	15 barrels b	15 barrels barrels	
Source	of Release				Date and Hour	Date and Hour of Occurrence D		Date and Hour of Discovery	
8" Steel	Pipeline				May 20, 2004	@ 1300	May 20, 2004	4 @ 1300	
Was In	Was Immediate Notice Given?      Image: Second				If YES, To Whom? Larry Johnson				
By Wh	om?				Date and Hour	ate and Hour			
Lynn Ward of DEFS			May 20, 2004 @ 1345						
Was a Watercourse Reached?  Yes No				If YES, Volume Impacting the Watercourse. NA					
If a Watercourse was Impacted, Describe Fully.* NA									
Describ	e Cause of Prob	lem and Remedial	Action Taken	l.*			0 1		
Steel line began leaking due to internal corrosion. Clamp Installed.									
Describ	e Area Affected	and Cleanup Acti	on Taken.*						
Soil contaminated above the NMOCD Remedial Guidelines blended on site to achieve the following remedial goals: TPH = $5,000 \text{ mg/Kg}$ , benzene = $10 \text{ mg/Kg}$ , and BTEX = $50 \text{ mg/Kg}$ .									
regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may and an and a regulations and perform corrective actions for releases which may and an area of the certain release notifications and perform corrective actions for releases which may and an area of the certain release notifications and perform corrective actions for releases which may and area of the certain release notifications and perform corrective actions for releases which may and areas are required to report and/or file certain release notifications and perform corrective actions for releases which may and areas are required to report and/or file certain release notifications and perform corrective actions for releases which may are required to report and/or file certain release notifications and perform corrective actions for releases which may are required to report and/or file certain release notifications and perform corrective actions for releases which may are required to report and/or file certain release notifications and perform corrective actions for releases which may are required to report and/or file certain release notifications are required to report and/or file certain release notifications are required to report and the results are required to report are required to report and the results are required to report are required to report and the results are required to report are required to required to report areas area									
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: Part Multy OIL CONSERVATION DIVISION							<u>/ISION</u>		
Printed Names, Paul Mulkey									
E-mail Address: pdmulkev@duke-energy.com				Approved by District Supervisor:					
Title: 1	Title: Maintenance Construction Supervisor			Approval Da	ite:	Expiration	Date:		
Date: $10/12/04$ Phone: (505) 397-5716			Conditions	f Annroval•		Attached 🗌			

* Attach Additional Sheets If Necessary