

DUKE ENERGY FIELD SERVICES



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

G-28 RELEASE SITE

DEFS REF: G-28 100702

UL-B (NW¼ OF THE NE¼) OF SECTION 31 T21S R36E

~8.3 MILES WEST (BEARING 271.5°) OF EUNICE

LEA COUNTY, NEW MEXICO

LATITUDE: N32°26'25.01

LONGITUDE: W103°18'02.86"

JULY 23, 2003

PREPARED BY: JCG

*Duke = 229153
facility = FPA0602039894
incident = NPA0602040084
application = PPA0602040361
inspect = EPA0602040011*

Environmental Plus, Inc.

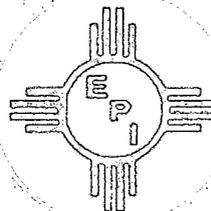
2100 Avenue O

P.O. Box 1558

Eunice, NM 88231

Phone: (505)394-3481

FAX: (505)394-2601





DUKE ENERGY FIELD SERVICES
370 17th Street
Suite 900
Denver, CO 80202
303 595 3331

September 19, 2003

Mr. Larry Johnson
New Mexico Oil Conservation Division
1625 N. French Drive
Hobbs, New Mexico 88240

**RE: G-28 100702 Spill Site Closure Report
Unit B, Section 31, T21S, R36E
Duke Energy Field Services, LP
Lea County, NM**

Mr. Johnson:

Enclosed please find for your review, one copy of the G-28 100702 closure report. The closure report summarizes the remedial activities associated with the clean up of the pipeline leak that occurred on December 7, 2002.

Based on the information provided in the above referenced closure report, DEFS would like to request no further action for this leak location.

If you have any questions regarding the information provided in the closure reports, please give me a call at 303-605-1718.

Sincerely

Duke Energy Field Services, LP

A handwritten signature in black ink, appearing to read 'S. Weathers', written over a horizontal line.

Stephen Weathers
Sr. Environmental Specialist

cc: Lynn Ward, DEFS Midland
Environmental Files

Enclosure

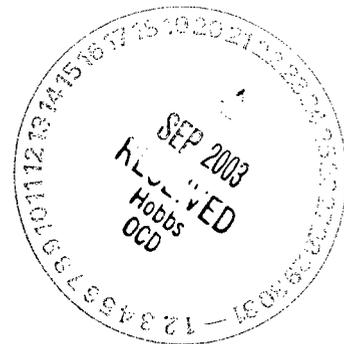


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Project Summary

Site Specific:

- ◆ **Company Name:** Duke Energy Field Services
- ◆ **Facility Name:** G-28 Natural Gas Gathering Pipeline
- ◆ **Project Reference** G-28 100702
- ◆ **Company Contact:** Paul Mulkey
- ◆ **Site Location:** WGS84: N32°26'25.01"; W103°18'02.86"
- ◆ **Legal Description:** Unit Letter B, (NW¼ of the NE¼), Section 31, T21S, R36E
- ◆ **General Description:** approximately 8.3 miles west (bearing 271.5°) from the intersection of State Roads 8 and 207 in, Eunice, Lea County, New Mexico
Elevation: 3,635-ft amsl **Depth to Ground Water:** >200-ft
- ◆ **Land Ownership:** DASCO Cattle Company (Atlee Snyder)
- ◆ **EPI Personnel:** Technical Manager – Pat McCasland
 Project Consultant – John Good
 Site Foreman – Eddie Joe Harper

Release Specific:

- ◆ **Product Released:** Natural Gas & NGL
- ◆ **Volume Released:** 7-10 bbl **Volume Recovered:** 0 bbl
- ◆ **Time of Occurrence:** 10/7/02 **Time of Discovery:** 10/7/02
- ◆ **Release Source:** 20" steel NG pipeline; integrity lost due to internal corrosion; repaired by clamping with ultimate replacement of section.
- ◆ **Initial Surface Area Affected:** 2,400-ft² release area + 11,700-ft² overspray

Remediation Specific:

- ◆ **Final Vertical extent of contamination:** 11-ft bgs; Remaining depth to ground water: 220-ft
- ◆ **Water wells within 1000-ft:** 0 **Surface water bodies within 1000-ft:** 0
- ◆ **NMOCD Site Ranking Index:** 0 points (>100-ft to top of water table)
- ◆ **Remedial goals for Soil < 100-ft bgs:** TPH – 5000 ppm; BTEX – 50 ppm; Benzene – 10 ppm; Chlorides – 250 ppm
- ◆ **RCRA Waste Classification:** Exempt
- ◆ **Remediation Option Selected:** a) Excavation and disposal of contaminated soil above NMOCD remedial goals; b) analytical confirmation of bottom-hole and sidewall contaminant levels; c) backfill with clean caliche and topsoil.
- ◆ **Disposal Facility:** Environmental Plus, Inc. **Volume disposed of:** 448-yd³
- ◆ **Project Completion Date:** December 16, 2002
- ◆ **Additional Commentary:** None

1.0 Introduction & Background

This report addresses the site investigation and remediation of the Duke Energy Field Services LP (DEFS) "G-28 100702" natural gas gathering line remediation site. On October 7, 2002, Environmental Plus, Inc. (EPI) was notified by DEFS regarding a newly discovered natural gas and associated natural gas liquids (NGL) release at this site. The initial C-141 Form submitted to the New Mexico Oil Conservation Division (NMOCD) of the NM Energy, Minerals and Natural Resources Department (October 11, 2002) reports the release volume (NGL) as 7-10 bbl with 0 bbl recovered. EPI responded the day of the notification and commenced GPS delineation, photography, flow path containment and characterization of the site. The site consisted of a ~2,400-ft² area with pooled NGL at the Point of Release and flowing westward from that point ~75-ft (*Plate 3, Attachments*). Remediation of this release site consisted of excavation and disposal of 448-yd³ of contaminated soil at EPI's approved surface waste facility, soil analyses for TPH, BTEX and Total Chlorides, backfilling and contouring of the excavation. Remediation of the site was completed on December 16, 2002.

The site is associated with the DEFS G-28 20" natural gas gathering pipeline. This release site is located in Unit Letter B, (NW¼ of the NE¼), Section 31, T21S, R36E, N32°26'25.01" and W103°18'02.86". It is ~8.3-miles west (271.5°) of Eunice, NM. The property is owned by Atlee Snyder, d.b.a. DASCO Cattle Company. 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 and reported to NMOCD on October 7, 2002. The Initial NMOCD C-141 Form was submitted on October 11, 2002. The leak was the result of internal pipe corrosion. The pipeline was clamped and a section was eventually replaced by DEFS personnel.

2.0 Site Description

2.1 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 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 (*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, 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 ground water aquifer at this site is projected to be ~230-ft bgs based on water depth data obtained from the NM State Engineers Office data base and information provided by the land owner. Ground water gradient in this area is generally to the east-southeast.

2.4 Area Water Wells

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

2.5 Area Surface Water Features

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

3.0 NMOCD Site Ranking

Site Matrix Table

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 0-130'bgs)			
Total Site Ranking Score and Acceptable Remedial Goal Concentrations			
Parameter	20 or >	10	0
Benzene¹	10 ppm	10 ppm	10 ppm
BTEX¹	50 ppm	50 ppm	50 ppm
TPH	100 ppm	1000 ppm	5000 ppm

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 greater than 200-ft 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 on the previous page.

4.0 Subsurface Soil Investigation

During the excavation phase of the project the area associated with the point of release (POR) was excavated to a depth of 11-ft bgs, the area immediately west of the POR was excavated to a depth of 9-ft, and the flow path extending west was excavated to a depth of 4-ft. These depths were deemed sufficient based upon visual observation and undetectable field VOC analyses as measured with portable ionization detection (PID) equipment. Sufficient lateral extent of the excavation was determined by achieving undetectable VOC levels. Composite bottom-hole samples of four distinct excavation areas were taken on December 4, 2002. Analytical results of this sampling (*Plate 4, Attachments*) indicate hydrocarbon contamination is well below the remedial goals for the site (maximum TPH of 264 ppm). BTEX and Benzene levels are at or below detection limits throughout the excavation. Chlorides are above the 250 ppm Water Quality Standard in the east and west areas of the 11-ft excavation near the POR (784 ppm and 992 ppm, respectively). Although these remaining chloride levels are above the desired 250 ppm goal, they are not significantly high enough to pose a risk to the deep ground water (~230-ft bgs) if left in place at this site. After consultation with NMOCD, contaminant removal was deemed sufficient to justify closure of the site.

5.0 Ground Water Investigation

The projected depth to ground water at this site is ~230-ft bgs. Excavation of the site was to a maximum depth of 11-ft. Final CoC levels of the bottom-hole of the excavation were confirmed to be significantly below remedial goal levels for Benzene and BTEX. The TPH concentrations in the 4-ft to 11-ft bottom-hole areas were in the range 20-264 ppm, well below the 5000 ppm remedial goal. The site was closed with a chloride concentration of ~900 ppm at the 11-ft excavation level, a concentration not significantly high enough to pose a risk to the ground water beneath the site.

The excavation was backfilled with clean caliche and topsoil obtained from the property owner. 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.

6.0 Remediation Process

Remediation of the site commenced on October 7, 2002 and continued through December 16, 2002. Remedial activities at the site consisted of excavation and disposal of 448-yd³ of NGL contaminated soil from the site. All contaminated soil removed from the site was disposed of in the NMOCD approved EPI land farm located south of Eunice, NM. The main excavation was backfilled up to approximately 3-feet below surface level with clean caliche purchased from the property owner. The remainder of the excavation was backfilled with clean topsoil purchased from the property owner to provide an adequate root zone.

The excavation (*Plate 3, Attachments*) was composite bottom-hole sampled on December 4, 2002. Analytical results (*Plate 4, Attachments*) indicate that remedial goals have been achieved in all areas of the excavation.

The product overspray and surface damaged areas (*Plate 3 – Attachments*) will be evaluated periodically for the necessity of re-seeding and/or erosion control.

7.0 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 the Environmental Plus, Inc. 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

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Lab Analytical Reports 12-15

Final NMOCD C-141 Form 16

Site Information and Metrics Form 17

Final NMOCD C-138 Form 18

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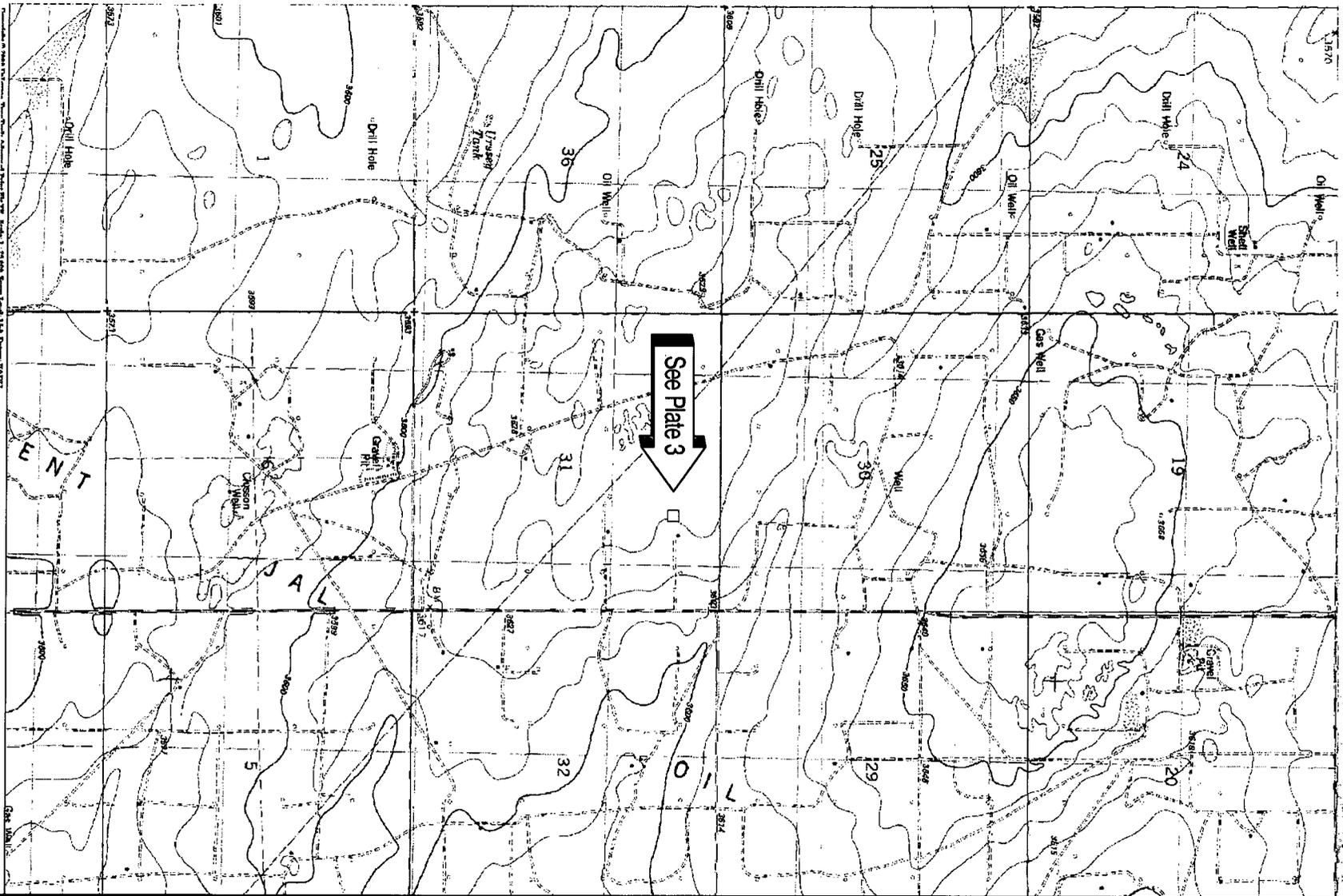


Plate 2 - Release Site Topography
 Duke Energy Field Services
 G-28 100702

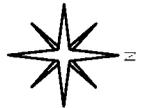
Lea County, New Mexico
 UL-B Section 31 T21S R36E
 N32° 26' 25.01" W103° 18' 02.86"
 Elevation: 3535-ft amsl

DWG BY: John Good
 OCTOBER - 2002

REVISED:
 JULY - 2003



SHEET
 1 of 1



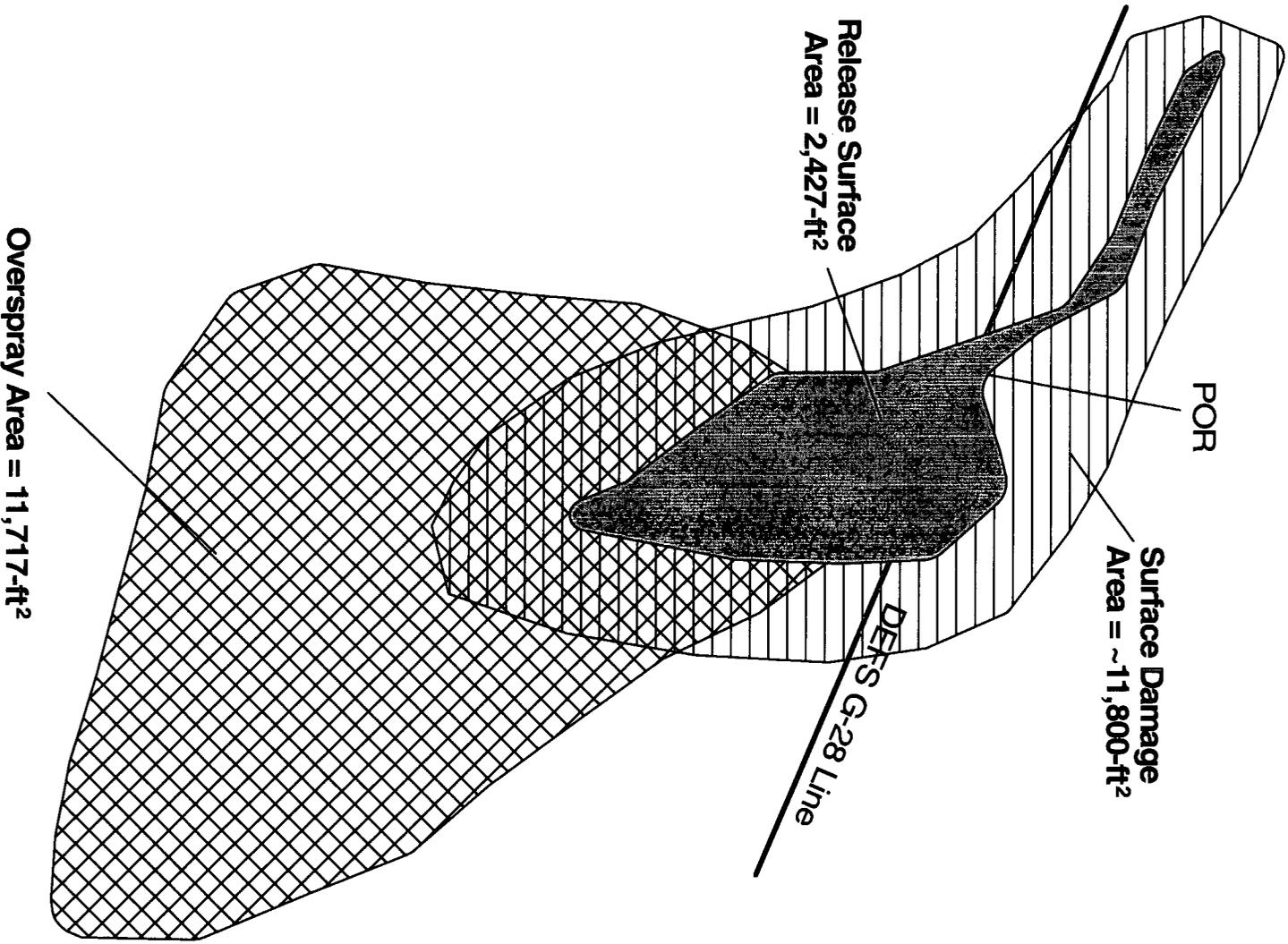


Plate 3 - Initial and Final GPS Demarcations Duke Energy Field Services G-28 - 110702	Lea County, New Mexico UL-B Section 31 T21S R36E N32° 26' 25.01" W103° 18' 02.86" Elevation: 3535-ft amsl		DWG BY: John Good OCTOBER - 2002	REVISED: JULY - 2003	
			SCALE: 		

Duke Energy Field Services - G-28 100702 - Excavation Sampling Results

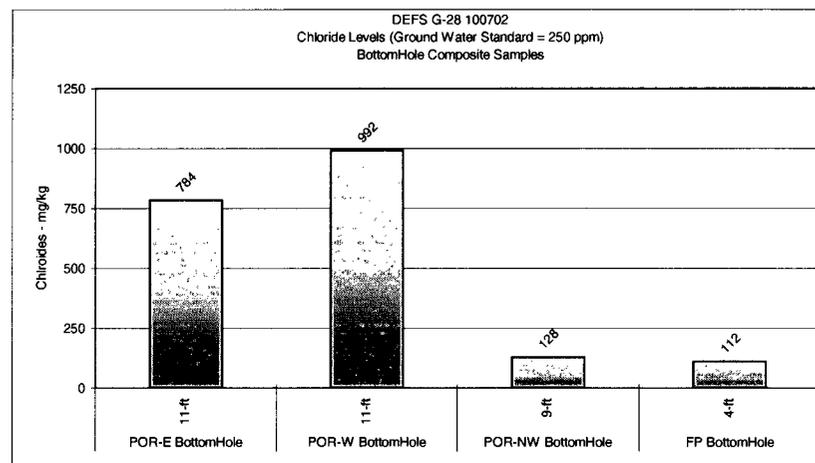
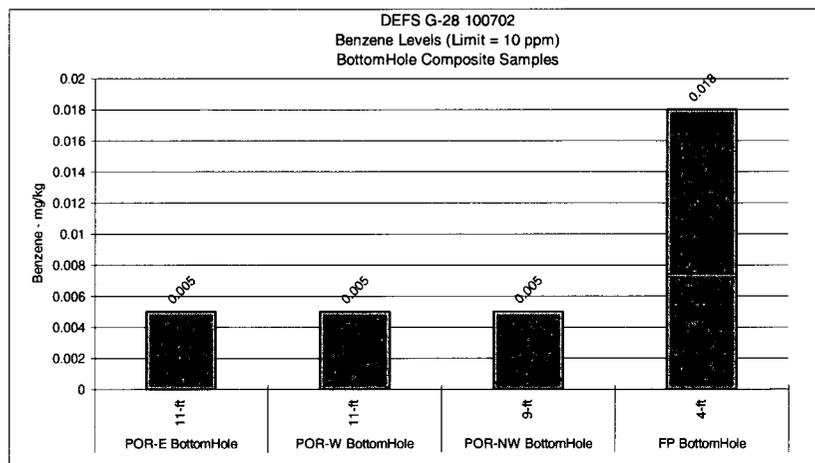
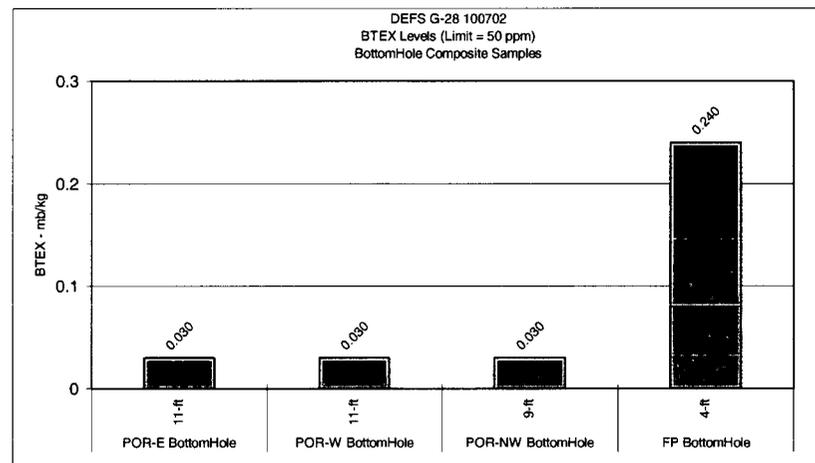
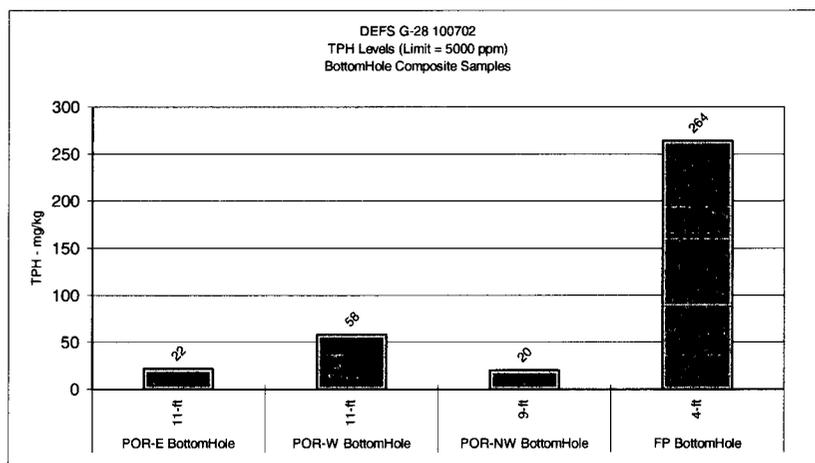
Sample Date	Excavation Sampling Area	Depth (ft - bgs ¹)	SAMPLE ID#	GRO ² mg/Kg	DRO ³ mg/Kg	TPH ⁴ mg/Kg	BTEX ⁵ mg/Kg	Benzene mg/Kg	Toluene mg/Kg	Ethyl Benzene mg/Kg	Total Xylenes mg/Kg	Cl ⁻ mg/Kg	SO ₄ mg/Kg	pH
4-Dec	POR-E BottomHole	11-ft	SDG28120402EBHC-11	10	12	22	0.030	0.005	0.005	0.005	0.015	784		
4-Dec	POR-W BottomHole	11-ft	SDG28120402WBHC-11	10	48	58	0.030	0.005	0.005	0.005	0.015	992		
4-Dec	POR-NW BottomHole	9-ft	SDG28120402NWBHC-9	10	10	20	0.030	0.005	0.005	0.005	0.015	128		
4-Dec	FP BottomHole	4-ft	SDG28120402FPBHC-4	10	254	264	0.240	0.018	0.008	0.032	0.182	112		

¹ bgs = below ground surface ² GRO - Gasoline Range Organics (Detection Limit = 10 mg/Kg) ³ DRO - Diesel Range Organics (Detection Limit = 10 mg/Kg)

⁴ TPH - Total Petroleum Hydrocarbon (GRO+DRO) ⁵ BTEX = Sum of CoC's (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.

Plate 4: Soil Analytical Data Table and Charts



Analytical Results



PHONE (815) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
 PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

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

Receiving Date: 12/04/02
 Reporting Date: 12/09/02
 Project Owner: DUKE ENERGY FIELD SERVICES
 Project Name: G-28 100702
 Project Location: SECTION 31 T21S R38E

Sampling Date: 12/04/02
 Sample Type: SOIL
 Sample Condition: COOL & INTACT
 Sample Received By: BC
 Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)	CI* (mg/Kg)
ANALYSIS DATE		12/08/02	12/08/02	12/05/02
H7281-1	SDG28120402EBHC-11	<10.0	12.1	784
H7281-2	SDG28120402WBHC-11	<10.0	47.9	992
H7281-3	SDG28120402NWBHC-9	<10.0	10.4	128
H7281-4	SDG28120402FPBHC-4	<10.0	254	112
Quality Control		750	813	980
True Value QC		800	800	1000
% Recovery		93.7	102	98.0
Relative Percent Difference		6.3	3.8	3.0

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

Buyer's Copy
 Chemist

12/9/02
 Date

H7281A.XLS

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.



PHONE (816) 873-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 383-2326 • 101 E. MARLAND • HOBBS, NM 88240

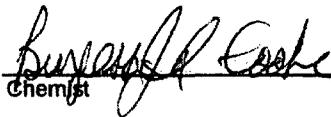
**ANALYTICAL RESULTS FOR
ENVIRONMENTAL PLUS, INC.
ATTN: JOHN GOOD
P.O. BOX 1558
EUNICE, NM 88231
FAX TO: (505) 394-2801**

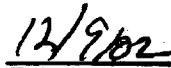
Receiving Date: 12/04/02
Reporting Date: 12/09/02
Project Owner: DUKE ENERGY FIELD SERVICES
Project Name: G-28 100702
Project Location: SECTION 31 T21S R38E

Sampling Date: 12/04/02
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	12/06/02	12/06/02	12/06/02	12/06/02
H7281-1	SDG28120402EBHC-11	<0.005	<0.005	<0.005	<0.015
H7281-2	SDG28120402WBHC-11	<0.005	<0.005	<0.005	<0.015
H7281-3	SDG28120402NWBHC-9	<0.005	<0.005	<0.005	<0.015
H7281-4	SDG28120402FPBHC-4	<0.005	0.008	0.032	0.162
	Quality Control	0.095	0.091	0.091	0.264
	True Value QC	0.100	0.100	0.100	0.300
	% Recovery	94.6	91.2	90.6	88.2
	Relative Percent Difference	0.8	0.4	4.1	4.1

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 analysis. 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 subcontractors 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.

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 June 10, 2003

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 100702	Facility Type	Natural Gas Gathering Pipeline

Surface Owner	DASCO Cattle Co.	Mineral Owner	NA	Lease No.	NA
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from South Line	Feet from West Line	Longitude	Latitude	County:
B	31	21S	36E	4453	3486	W103° 18' 02.86"	N32° 26' 25.01"	Lea

NATURE OF RELEASE

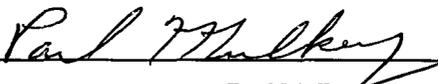
Type of Release	Volume of Release	Volume Recovered
Natural Gas release and associated NGL's	~10 bbl	0 bbl
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
20" Steel Pipeline	10/7/2002	10/7/02
Was Immediate Notice Given?	If YES, To Whom?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	NMOCD-Hobbs	
By Whom?	Date and Hour	
Stan Shaver - DEFS	10/7/2002	
Was a Watercourse Reached?	If YES, Volume Impacting the Watercourse.	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	NA	

If a Watercourse was Impacted, Describe Fully.*
NA

Describe Cause of Problem and Remedial Action Taken.*
Internally Corroded pipeline, repaired by clamping leak

Describe Area Affected and Cleanup Action Taken.*
-2400-ft² surface spill area affected + ~11,700-ft² overspray. 448-yd³ of RCRA Exempt Non-hazardous contaminated soil excavated and disposed of by EPI. Backfilled will be clean caliche and topsoil.

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: 	OIL CONSERVATION DIVISION	
Printed Name: Paul Mulkey	Approved by District Supervisor:	
Title: Construction/Maintenance Superintendent	Approval Date:	Expiration Date:
E-mail Address: pdmulkey@duke-energy.com	Conditions of Approval: <input type="checkbox"/> Attached .	
Date: 7/23/03 Phone: 505-397-5716		

* Attach Additional Sheets If Necessary

		Incident Date and NMOCD Notified?	
		10/7/02	10/7/2002
SITE: G-28 100702		Assigned Site Reference # 100702	
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):		~10	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:		# 100702	
Source of contamination:		20" Steel Pipeline	
Land Owner, i.e., BLM, ST, Fee, Other:		DASCO Cattle Co.	
LSP Dimensions:		(GPS Site Diagram attached)	
LSP Area:		~2400 -ft ²	
Location of Reference Point (RP):			
Location distance and direction from RP:			
Latitude:		N32° 26' 25.01"	
Longitude:		W103° 18' 02.86"	
Elevation above mean sea level:		3535 -ft amsl	
Feet from South Section Line:		4453	
Feet from West Section Line:		3486	
Location - Unit and 1/4 1/4:		UL- B NW 1/4 of NE 1/4	
Location - Section:		31	
Location - Township:		21S	
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):		230	
Depth (ft) of contamination (DC):		11	
Depth (ft) to ground water (DG - DC = DtGW):		219	
1. Ground Water		2. Wellhead Protection Area	
3. Distance to Surface Water Body			
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		<200 horizontal feet: 20 points	
If Depth to GW >100 feet: 0 points		200-100 horizontal feet: 10 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 Area Score: 0	
Surface Water Score: 0		Site Rank (1+2+3) = 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

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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-138

Revised March 17, 1999

Submit 2 Copies to appropriate
District Office in accordance
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side of form

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input checked="" type="checkbox"/> Non-Exempt: <input type="checkbox"/>	4. Generator: DUKE ENERGY FIELD SERVICES
Verbal Approval Received?: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	5. Originating Site Designation: G-28 Gathering # 100702
2. Management Facility Designation: Environmental Plus, Inc. Land Farm #NM-01-0013	6. Transporter: Environmental Plus, Inc.
3. Address of Facility Operator: 2100 Avenue O, P.O. Box 1558, Eunice, NM 88231	7. State New Mexico
8. Location of Material (Street Address or ULSTR) UL- B Section 31 T 21S R 36E	
9. Circle One: <p>A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste status from the Generator; one certificate per job.</p> <p>B. All requests for approval to accept non-exempt wastes must be accompanied by the necessary chemical analysis to PROVE the material is non-hazardous and the Generator's certification of origin. No waste classified as "HAZARDOUS" by listing or testing shall be approved.</p> <p>All transporters must certify the wastes delivered are only those consigned for transport.</p>	

BRIEF DESCRIPTION OF MATERIAL:

**Contaminated Soil(s): hydrocarbon release involving -
Natural Gas release and associated NGL's**

Estimated Volume: 600 yd³ Known volume (to be entered by the operator at the end of the haul: (yd³) 448 yd³

SIGNATURE:  TITLE: EPI Environmental Consultant DATE: 10/11/02
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: John Good TELEPHONE NO.: 505-394-3481 FAX: 505-394-2601

(This space for State Use)

APPROVED BY: _____	TITLE: _____	DATE: _____
APPROVED BY: _____	TITLE: _____	DATE: _____

Environmental Plus, Inc.

Environmental Services & Land Farm

Permit # NM-01-0013

Micro-Blaze



Certificate of Waste Status

"RCRA Exempt Waste"

Company: DUKE ENERGY FIELD SERVICES

Origin: UL or ¼ ¼: **B** Section: **31** Township: **21S** Range: **36E**

Source Description (Pipeline, Lease, Battery, Flowline, etc.) Natural Gas Gathering Pipeline

20" Steel Pipeline

"As a condition of acceptance for disposal, I hereby certify that this waste is an *exempt* waste as defined by the Environmental Protection Agency (EPA) July 1988 Regulatory Determination and to my knowledge, this waste been characterized as "non-hazardous" pursuant to the provisions of EPA 40 CFR Part 261 Subpart C and has not been comingled with an EPA 40 CFR Part 261 Subpart D "Listed Waste."

NORM Exposure Rate: < 50 µR/Hour

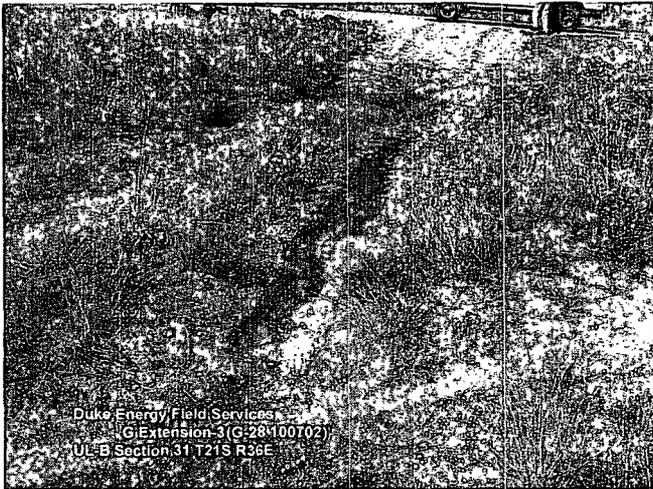
I, Paul Mulkey, the undersigned agent for

DUKE ENERGY FIELD SERVICES,

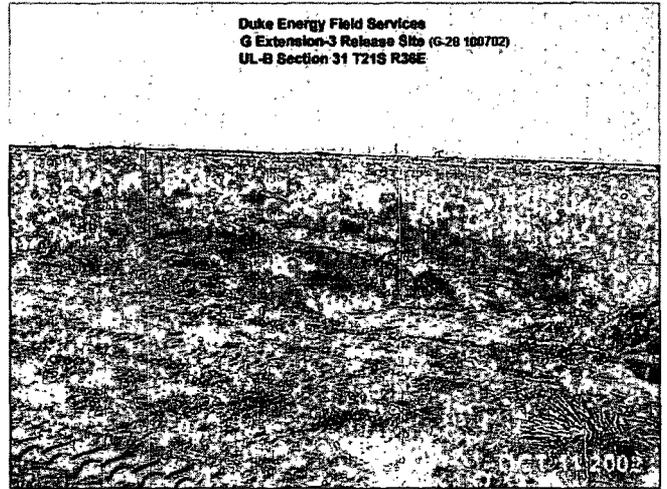
hereby certify that, based on personal knowledge,
the above statement is true and correct.

Name Paul Mulkey
 Title Construction/Maintenance Superintendent
 Address 11525 W. Carlsbad Hwy.
Hobbs, NM 88240

Signature *Paul Mulkey*
 Date Friday, October 11, 2002



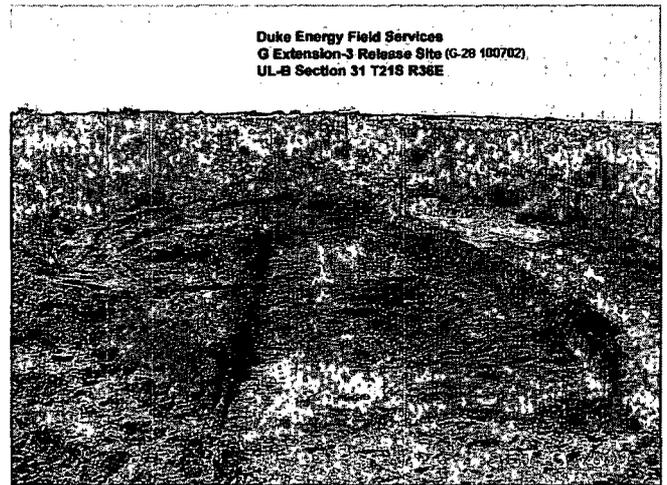
Flow path extending north from POR (from S to N)



Flow path extending west from POR (from E to W)



Flow path west of POR (from W to E)



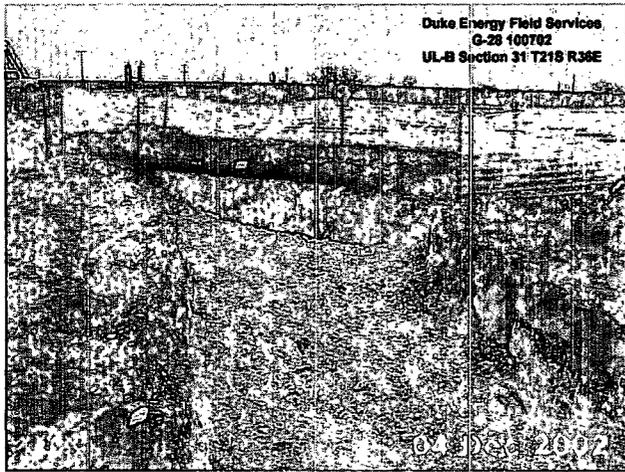
Flow path west of POR (from E to W)



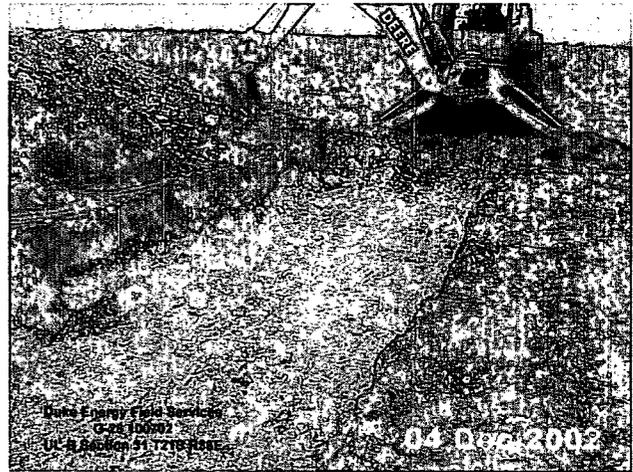
POR Exposed



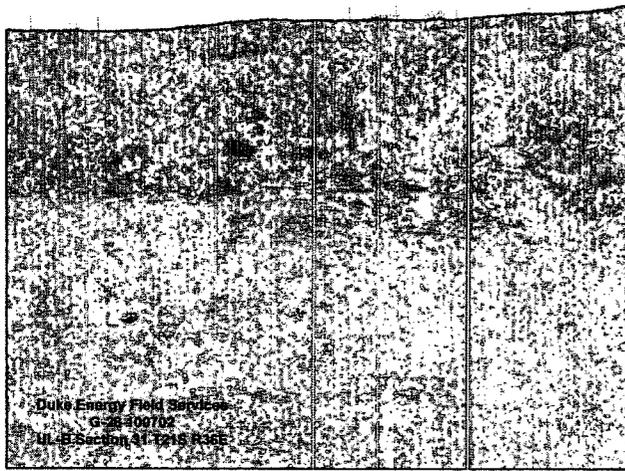
11-ft Excavation Depth at POR



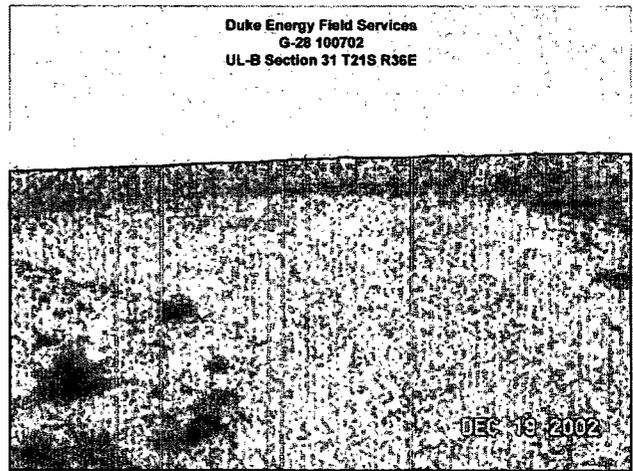
Excavation from W to E



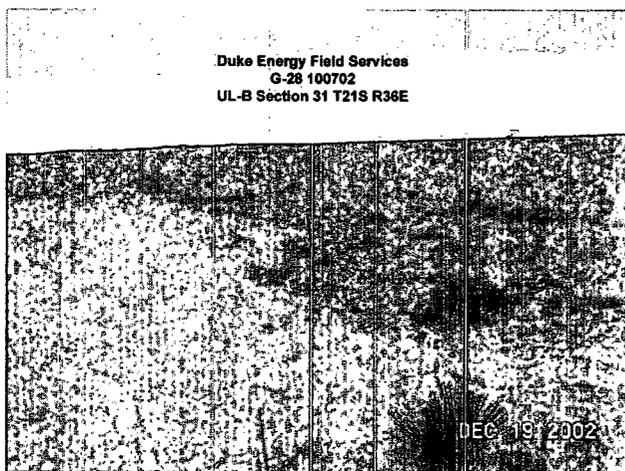
Excavation from E to W



Final Cover (west portion)



Final Cover from E to W



Final Cover

Memo



To: Larry Johnson, NMOCD, Hobbs Office
From: John Good
CC:
Date: November 22, 2002
Re: Duke G-Extension 3 100702 Name Change

Larry:

Paul Mulkey was mistaken when he originally told us the pipeline related to this spill was the "G – Extension 3". We have renamed the project to correctly reflect the proper pipeline designation. It is now the "G-28 100702" remediation project.

I have revised and attached the C141 and C138 documentation to reflect the name change.

District I

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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 West Carlsbad Hwy Hobbs, NM 88240	Telephone No. 505-397-5716
Facility Name G-28 Line 100702	Facility Type Natural Gas Pipeline

Surface Owner DASCO Cattle Co. (Atlee Snyder)	Mineral Owner	Lease No.
---	---------------	-----------

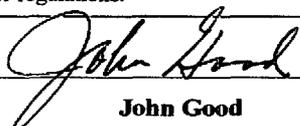
LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from South Line	Feet from West Line	Longitude	Latitude	County:
B	31	21S	36E	4453	3486	W103:18:02.86	N32:26:25.01	Lea

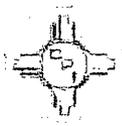
NATURE OF RELEASE

Type of Release Natural Gas and associated liquid components	Volume of Release (bbl) 7-10 bbl	Volume Recovered (bbl) 0
Source of Release Steel Natural Gas Pipeline	Date and Hour of Occurrence 10/07/02	Date and Hour of Discovery 10/7/02
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? NMOCD District Office (Hobbs)	
By Whom? Stan Shaver	Date and Hour 10/07/02	
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.* Corroded natural gas pipeline, repaired with clamp		
Describe Area Affected and Cleanup Action Taken.* ~2400-ft² surface area affected by pooled NGLs, ~11,700-ft² affected by overspray SW from POR. Repair excavation has been backfilled. Site is awaiting vertical delineation and remediation. (GPS site diagram attached)		

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: 	OIL CONSERVATION DIVISION		
Printed Name: John Good	Approved by District Supervisor:		
Title: Environmental Plus, Inc. Environmental Consultant	Approval Date:	Expiration Date:	
Date: 10/11/02 Phone: 505-394-3481	Conditions of Approval:		<input type="checkbox"/> Attached

Attach Additional Sheets If Necessary



October 11, 2002

Mr. Larry Johnson
New Mexico Oil Conservation Division
1625 North French
Hobbs, New Mexico 88240

Revised

Subject: Duke Energy Field Services G-28 100702 Site Initial C-141 and Remediation Plan

Dear Mr. Johnson:

Environmental Plus, Inc. (EPI), on behalf of Mr. Paul Mulkey, Duke Energy Field Services, submits the attached New Mexico Oil Conservation Division Form C-141 for the above referenced leak site located on land owned by DASCO Cattle Co. (Atlee Snyder), Eunice, NM 88231. The release volume is estimated to be 7-10 bbl of NGL with 0 bbl recovered. The site is located in the NW¼ of the NE¼ (Unit Letter B), Section 31, Township 21 South, and Range 36 East. The geographic location is N32°26'25.01"; W103°18'02.86". The site is ~8.3 miles west (bearing 271.5°) from the intersection of State Roads 8 and 207 in, Eunice, Lea County, New Mexico. According to information obtained from the New Mexico Office of the State Engineer (NMOSE) database, ground water level beneath this site is ~230-feet below ground surface (bgs). The site matrix ranking for this site is 0 due to the depth to ground water from lower contaminant level being greater than 100-ft.

The remedial action plan for this site is to delineate and characterize the soil contamination within the affected area of the natural gas and liquids release, excavate, dispose of and/or blend and attenuate on-site the RCRA exempt contaminated soils, and backfill the excavation with clean soil obtained on-site and/or off-site from private or public sources. Any RCRA exempt contaminated soils excavated and removed from the site will be disposed of in EPI's approved land farm located south of Eunice, NM.

The Constituents of Concern (CoC's) and associated NMOCD acceptable remedial levels are as follows:

- BTEX⁸⁶²⁰ (Benzene, Toluene, Ethyl Benzene, and Xylenes): 50 mg/kg
- TPH^{8015m} (Total Petroleum Hydrocarbon): 5000 mg/kg
- Benzene⁸⁶²⁰: 10 mg/kg

It is EPI's standard operating procedure to evaluate natural gas release sites for the presence of elevated levels of SO₄⁻ and Cl⁻ ions. These inorganic contaminants are often present in subsurface soils associated with sour gas releases and/or releases containing a brine component. Due to the shallow depth of contamination and >200-ft depth to groundwater at this release site, it is EPI's intent to presume that sulfates and chlorides will not be an issue in the remediation of this site.

If there are any questions please call Mr. Ben Miller, or myself, at our office or at (505) 390-0288 and (505) 390-9804, respectively or Mr. Paul Mulkey at (505) 397-5716. All official written communications should be addressed to:

Mr. Paul Mulkey
Duke Energy Field Services
11525 West Carlsbad Highway
Hobbs, New Mexico 88240

Sincerely,

John Good
EPI Environmental Consultant

cc: Paul Mulkey, Duke Energy Field Services, w/enclosure
Ben Miller, EPI Vice President and General Manager
Sherry Miller, EPI President
file

District I

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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 West Carlsbad Hwy, Hobbs, NM 88240
Telephone No.: 505-397-5716
Facility Name: G-28 Line 100702
Facility Type: Natural Gas Pipeline

Surface Owner: DASCO Cattle Co. (Atlee Snyder)
Mineral Owner:
Lease No.:

LOCATION OF RELEASE

Table with 9 columns: Unit Letter, Section, Township, Range, Feet from South Line, Feet from West Line, Longitude, Latitude, County. Values: B, 31, 21S, 36E, 4453, 3486, W103:18:02.86, N32:26:25.01, Lea

NATURE OF RELEASE

Type of Release: Natural Gas and associated liquid components
Volume of Release (bbl): 7-10 bbl
Volume Recovered (bbl): 0
Source of Release: Steel Natural Gas Pipeline
Date and Hour of Occurrence: 10/07/02
Date and Hour of Discovery: 10/7/02
Was Immediate Notice Given? [X] Yes [] No [] Not Required
If YES, To Whom? NMOCD District Office (Hobbs)
By Whom? Stan Shaver
Date and Hour: 10/07/02
Was a Watercourse Reached? [] Yes [X] No
If YES, Volume Impacting the Watercourse. NA

If a Watercourse was Impacted, Describe Fully.*
NA

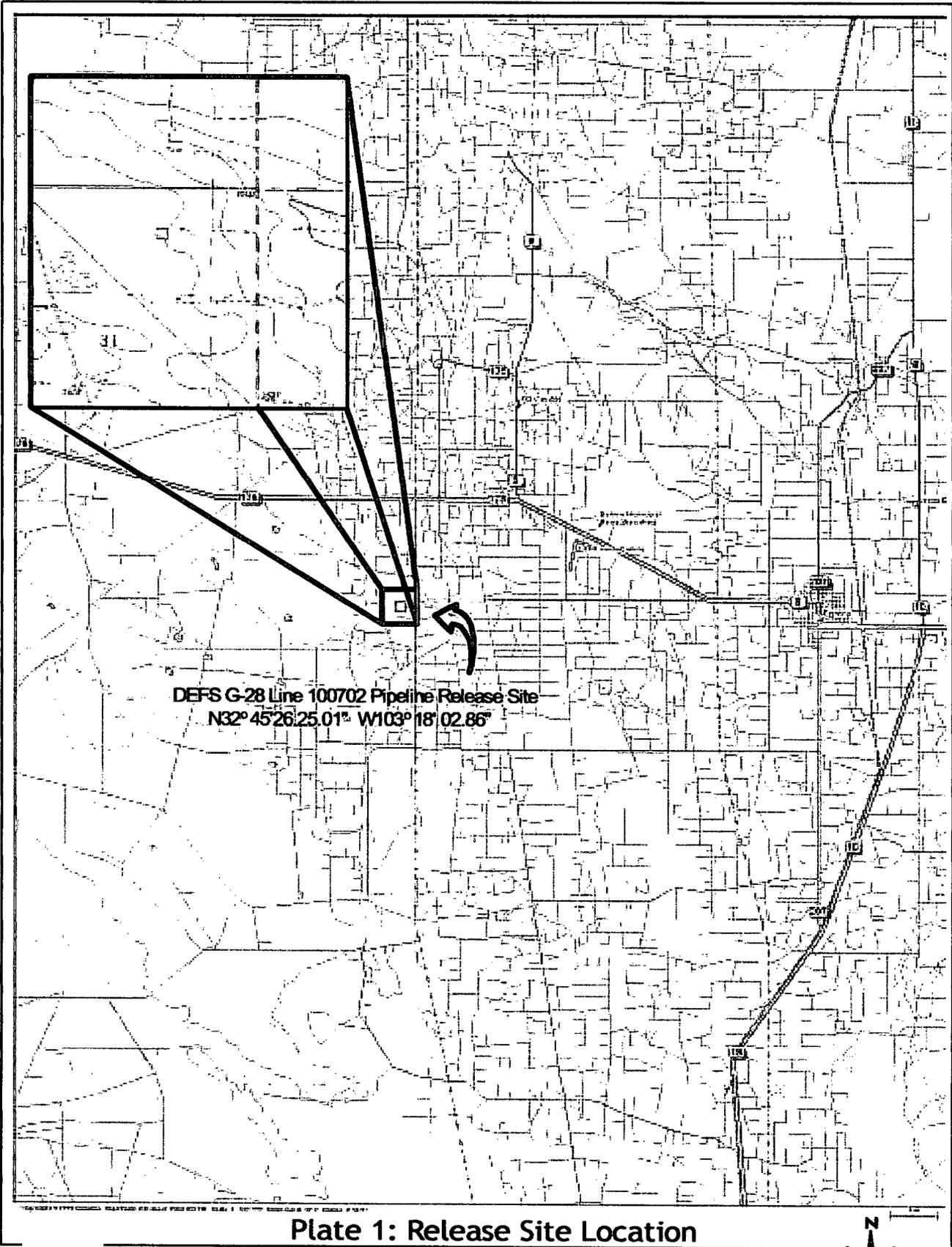
Describe Cause of Problem and Remedial Action Taken.*
Corroded natural gas pipeline, repaired with clamp

Describe Area Affected and Cleanup Action Taken.*
~2400-ft^2 surface area affected by pooled NGLs, ~11,700-ft^2 affected by overspray SW from POR. Repair excavation has been backfilled. Site is awaiting vertical delineation and remediation. (GPS site diagram attached)

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.

Signature: John Good
Printed Name: John Good
Title: Environmental Plus, Inc. Environmental Consultant
Approved by District Supervisor:
Approval Date:
Expiration Date:
Date: 10/11/02 Phone: 505-394-3481
Conditions of Approval: [] Attached

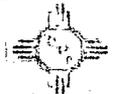
Attach Additional Sheets If Necessary



DEFS G-28 Line 100702 Pipeline Release Site
 N32° 45' 26.25.01" W103° 18' 02.86"

Plate 1: Release Site Location

Duke Energy Field Services - G-28 100702
 Lea County, NM; UL-B Section 31 T21S R36E



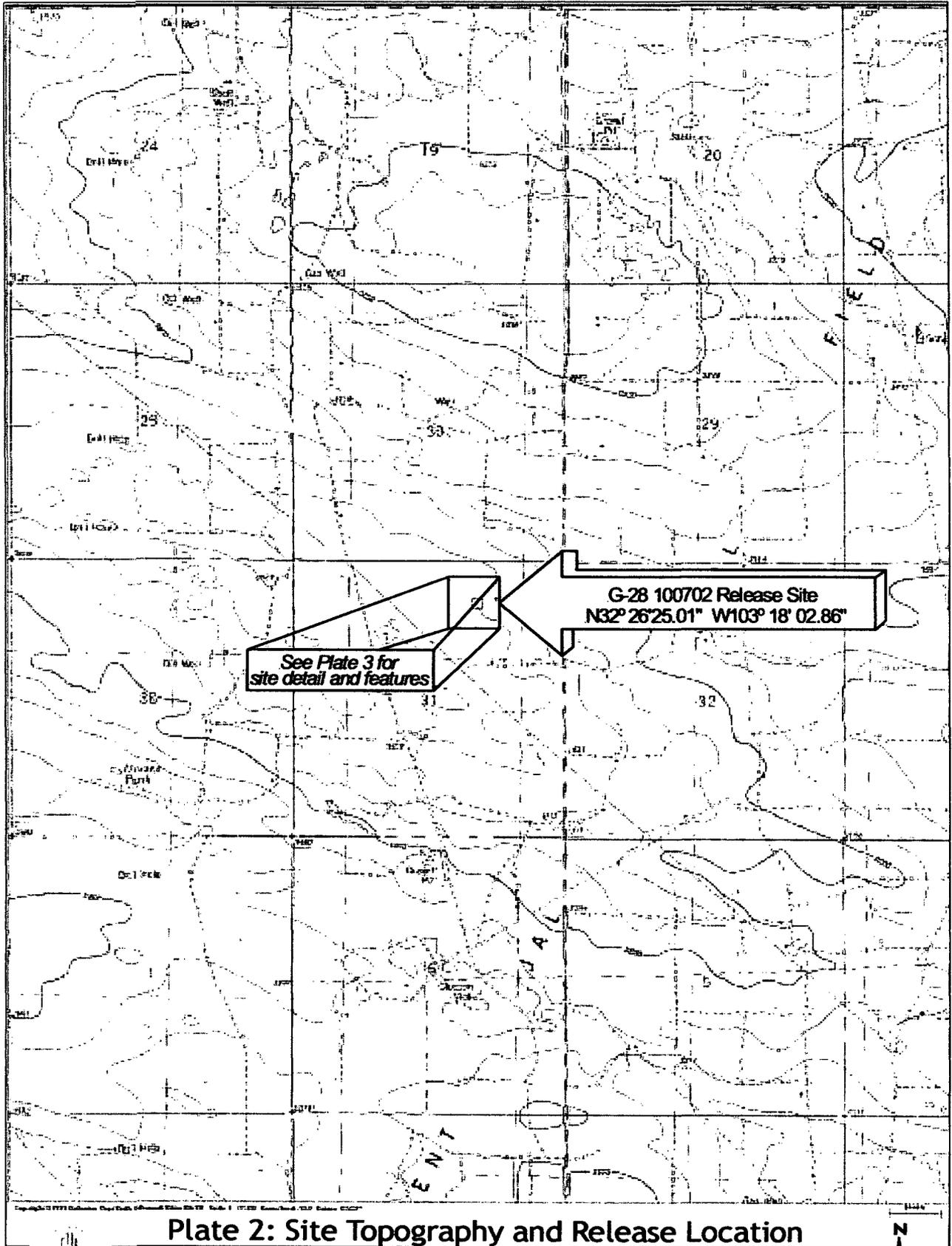


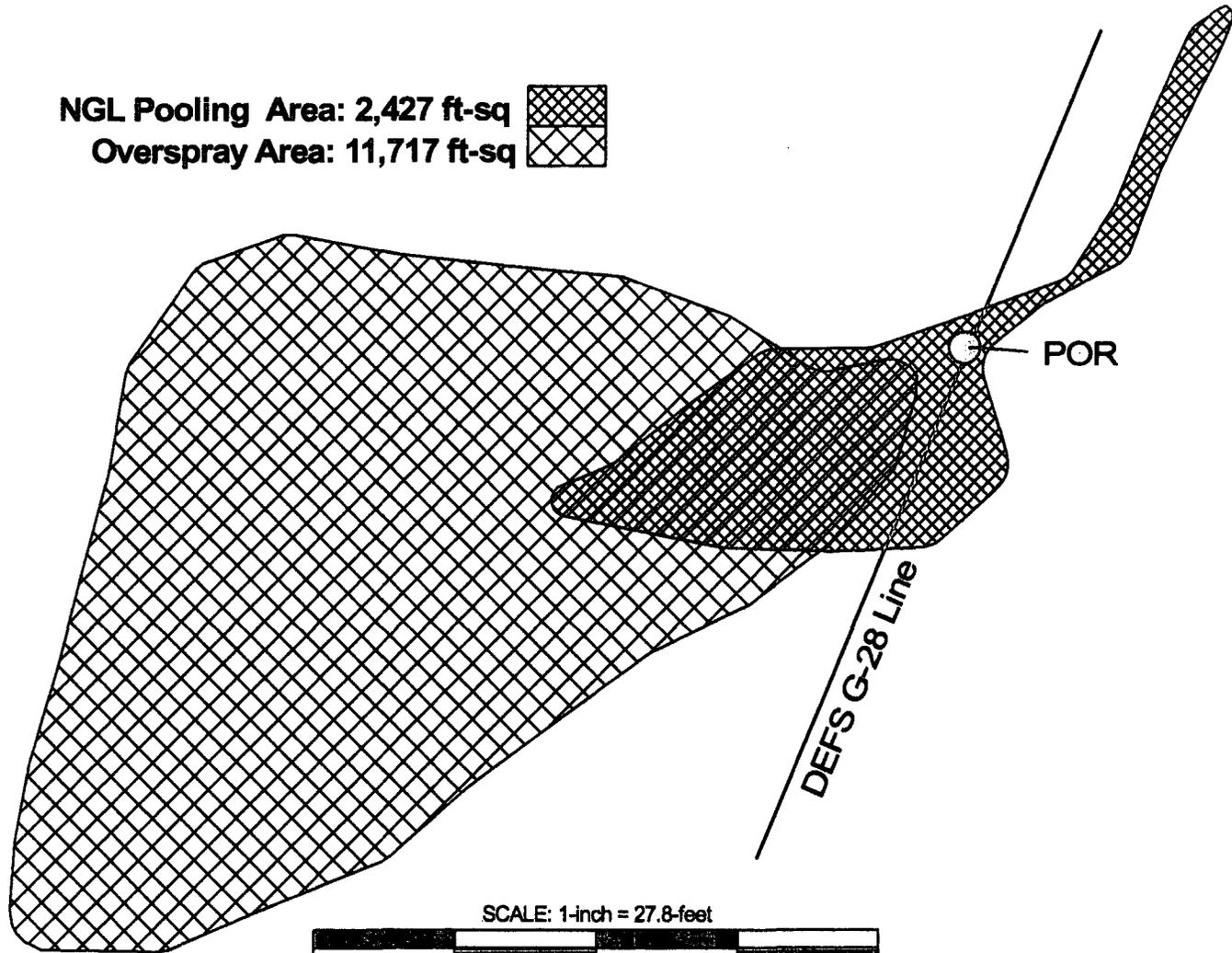
Plate 2: Site Topography and Release Location

**Duke Energy Field Services - G-28 100702
Lea County, NM; UL-B Section 31 T215 R36E**



NGL Pooling Area: 2,427 ft-sq

Overspray Area: 11,717 ft-sq

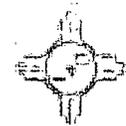


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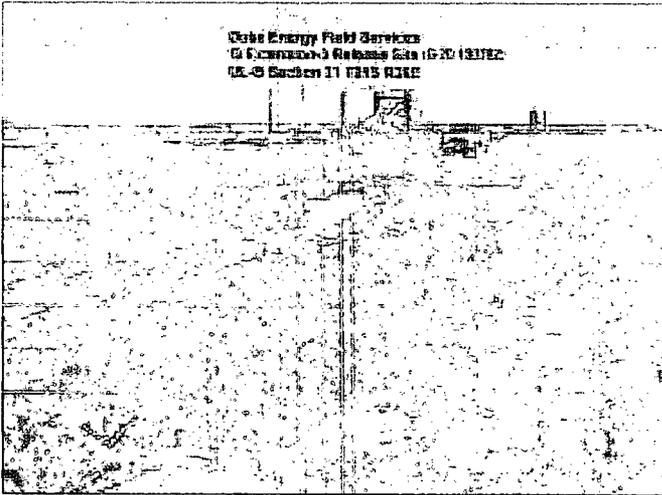


Plate 3: Release Site GPS Demarcation
Duke Energy Field Services - G-28 100702
Lea County, NM; UL-B Section 31 T21S R36E

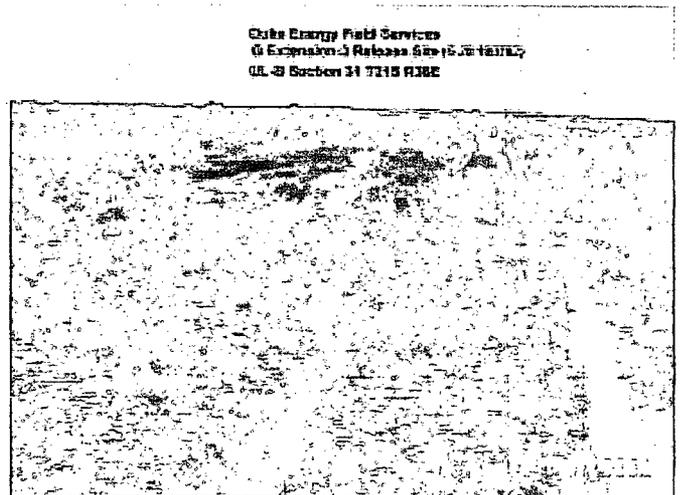
Drawn By: JCG Date: Oct-02 Revised: Nov-02



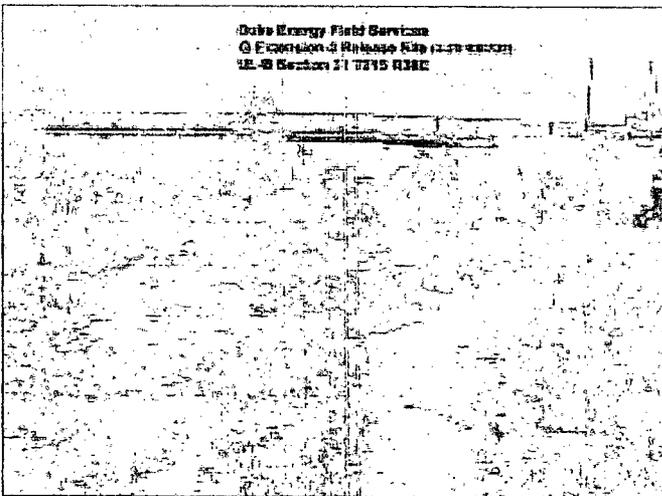
Oriskany Field Services
G Estimation-3 Release Site (G-20) (8/1/02)
UL-B Section 31 7215 R38E



Oriskany Field Services
G Estimation-3 Release Site (G-20) (8/1/02)
UL-B Section 31 7215 R38E



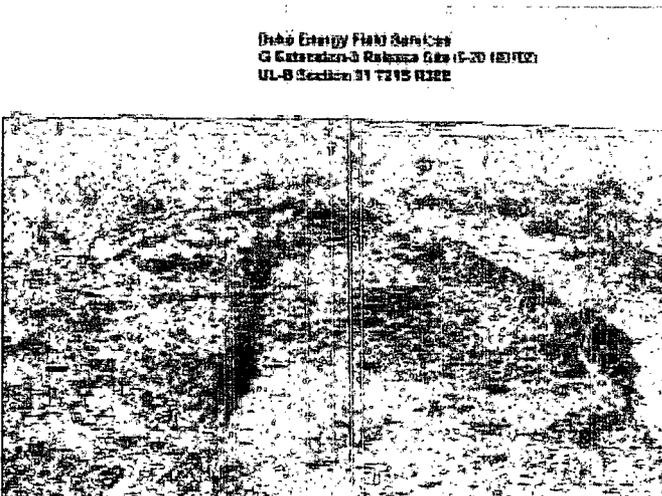
Oriskany Field Services
G Estimation-3 Release Site (G-20) (8/1/02)
UL-B Section 31 7215 R38E



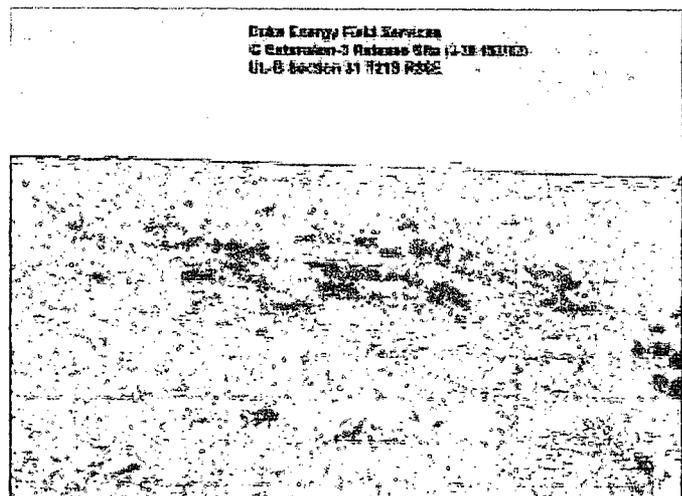
Oriskany Field Services
G Estimation-3 Release Site (G-20) (8/1/02)
UL-B Section 31 7215 R38E



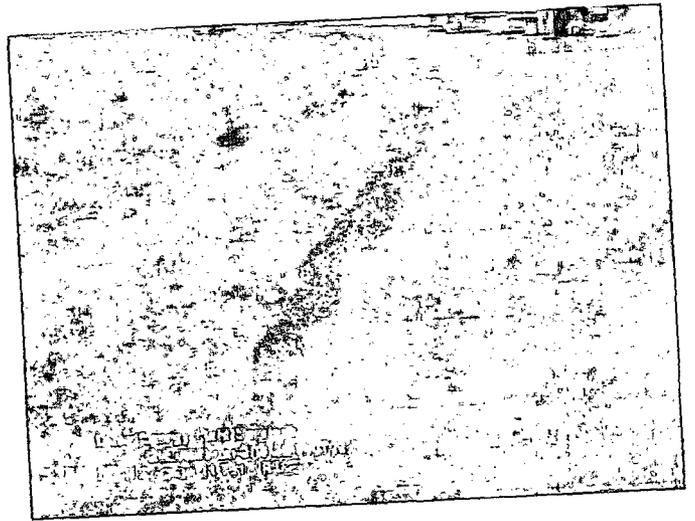
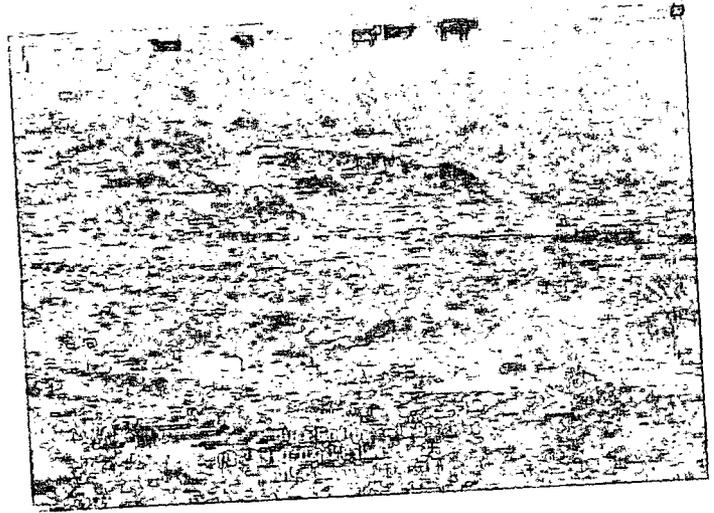
Oriskany Field Services
G Estimation-3 Release Site (G-20) (8/1/02)
UL-B Section 31 7215 R38E



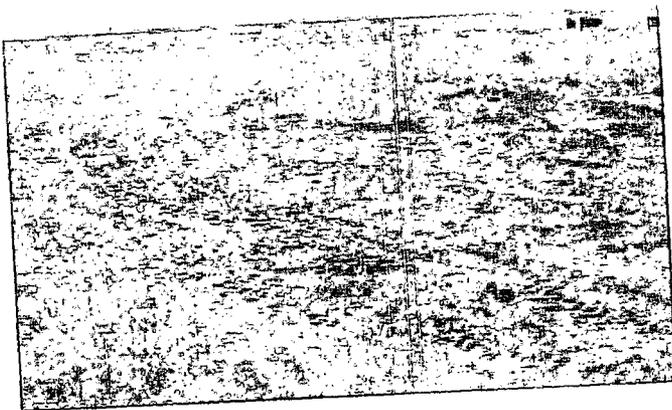
Oriskany Field Services
G Estimation-3 Release Site (G-20) (8/1/02)
UL-B Section 31 7215 R38E



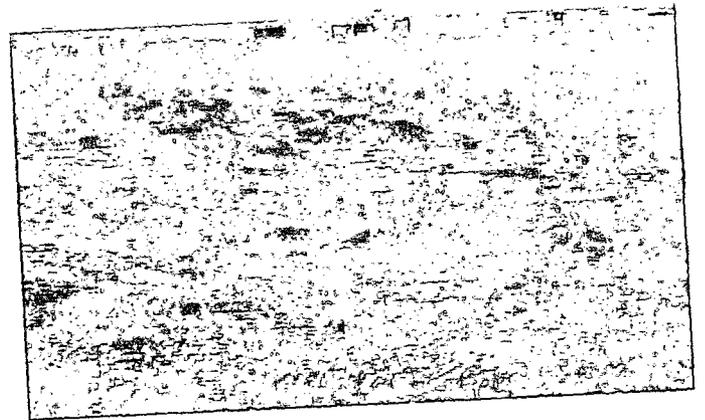
Duke Energy Field Services
G Extension-3 (G-28 100702)
UL-8 Section 31 T218 R35E



Duke Energy Field Services
G Extension-3 (G-28 100702)
UL-8 Section 31 T218 R35E

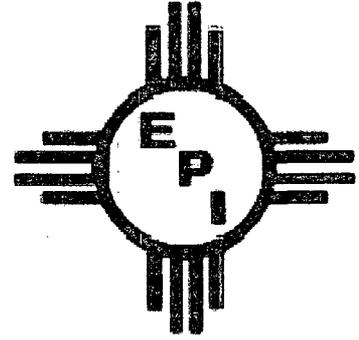


Duke Energy Field Services
G Extension-3 (G-28 100702)
UL-8 Section 31 T218 R35E



Environmental Plus, Inc.

2100 Ave O, P.O. Box 1558
Eunice, NM 88231
Phone: 505-394-3481
FAX: 505-394-2601
Email: enviplus1@aol.com



FAX

To: Larry Johnson / NMOCD **From:** John Good

Fax: 505.393.0720 **Pages:** 2 + cover

Phone: 505.393.6161 **Date:** 10/11/02

Re: Duke Energy G-28 100702. **CC:**

Urgent **For Review** **Please Comment** **Please Reply** **Please Recycle**

Mr. Johnson,

Attached is the NMOCD form C-138 and characterization data supporting the request to dispose of the RCRA "non-hazardous" contaminated soil from the Duke Energy Field Services G-28 Line 100702 remediation site in the Environmental Plus, Inc. Land farm south of Eunice, New Mexico.

Sincerely,

A handwritten signature in cursive script that reads "John Good".

John Good, Environmental Consultant

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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

Submit 2 Copies to appropriate
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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 West Carlsbad Hwy Hobbs, NM 88240	Telephone No. 505-397-5716
Facility Name G-28 Line 100702	Facility Type Natural Gas Pipeline

Surface Owner DASCO Cattle Co. (Atlee Snyder)	Mineral Owner	Lease No.
---	---------------	-----------

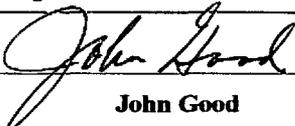
LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from South Line	Feet from West Line	Longitude	Latitude	County:
B	31	21S	36E	4453	3486	W103:18:02.86	N32:26:25.01	Lea

NATURE OF RELEASE

Type of Release Natural Gas and associated liquid components	Volume of Release (bbl) 7-10 bbl	Volume Recovered (bbl) 0
Source of Release Steel Natural Gas Pipeline	Date and Hour of Occurrence 10/07/02	Date and Hour of Discovery 10/7/02
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? NMOCD District Office (Hobbs)	
By Whom? Stan Shaver	Date and Hour 10/07/02	
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.* Corroded natural gas pipeline, repaired with clamp		
Describe Area Affected and Cleanup Action Taken.* ~2400-ft² surface area affected by pooled NGLs, ~11,700-ft² affected by overspray SW from POR. Repair excavation has been backfilled. Site is awaiting vertical delineation and remediation. (GPS site diagram attached)		

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: 	OIL CONSERVATION DIVISION		
Printed Name: John Good	Approved by District Supervisor:		
Title: Environmental Plus, Inc. Environmental Consultant	Approval Date:	Expiration Date:	
Date: 10/11/02 Phone: 505-394-3481	Conditions of Approval:		<input type="checkbox"/> Attached

Attach Additional Sheets If Necessary

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-138
Revised March 17, 1999

Submit Original
Plus 1 Copy
to Appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input checked="" type="checkbox"/> Non-Exempt: <input type="checkbox"/>	6. Generator Duke Energy Field Services
Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5. Originating Site G-28 100702
2. Management Facility Destination Environmental Plus, Inc. Landfarm #NM-01-0013	6. Transporter Environmental Plus, Inc.
3. Address of Facility Operator 2100 Avenue O, P.O. Box 1558, Eunice, New Mexico 88231	8. State New Mexico
7. Location of Material (Street Address or ULSTR) UL-B Section 31 T21S R36E	
9. <u>Circle One</u> : <input checked="" type="radio"/> A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. <input type="radio"/> B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Contaminated Soil – Natural Gas Line leak

Estimated Volume 600 yd³ Known Volume (to be entered by the operator at the end of the haul) _____ yd³

SIGNATURE John Good TITLE: EPI Environmental Consultant DATE: October 11, 2002
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: John Good TELEPHONE NO. 505-394-3481

APPROVED BY: _____ TITLE: _____ DATE: _____

ENVIRONMENTAL PLUS, INC.

Environmental Services & Land Farm

PERMIT # NM-01-0013

CERTIFICATE OF WASTE STATUS

"RCRA EXEMPT WASTE"

COMPANY: DUKE ENERGY FIELD SERVICES

ORIGIN: UL OR ¼¼: B SECTION: 31 TOWNSHIP: 21S RANGE: 36E

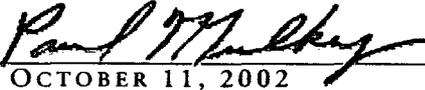
SOURCE DESCRIPTION (PIPELINE, LEASE, BATTERY, FLOWLINE, ETC.) PIPELINE

G-28 NATURAL GAS PIPELINE (100702 RELEASE SITE)

"AS A CONDITION OF ACCEPTANCE FOR DISPOSAL,
I HEREBY CERTIFY THAT THIS WASTE IS AN **EXEMPT WASTE**
AS DEFINED BY THE ENVIRONMENTAL PROTECTION AGENCY (EPA) JULY 1988
REGULATORY DETERMINATION AND TO MY KNOWLEDGE, THIS WASTE HAS BEEN
CHARACTERIZED AS "NON-HAZARDOUS" PURSUANT TO THE PROVISIONS OF EPA 40 CFR
PART 261 SUBPART C AND HAS NOT BEEN COMINGLED WITH AN EPA 40 CFR PART 261
SUBPART D "LISTED WASTE."

I, PAUL MULKEY, THE UNDERSIGNED AGENT
FOR DUKE ENERGY FIELD SERVICES, HEREBY CERTIFY THAT,
BASED ON PERSONAL KNOWLEDGE, THE ABOVE STATEMENT IS TRUE AND CORRECT.

NAME PAUL MULKEY
TITLE MAINTENANCE & CONSTRUCTION SUPERVISOR
ADDRESS 11525 WEST CARLSBAD HIGHWAY
HOBBS, NEW MEXICO 88240

SIGNATURE 
DATE OCTOBER 11, 2002