

February 16, 2004

Mr. Larry Johnson New Mexico Oil Conservation Division – District I 1625 North French Drive Hobbs, New Mexico 88240

Re: Pipeline Spill Remediation Report, Dynegy Midstream Services. L.P., Site #11, Unit Letter M (SW/4, SW/4), Section 34, Township 19 South, Range 36 East, Lea County, New Mexico

Dear Mr. Johnson:

This letter presents the results of remediation efforts for a natural gas pipeline leak (Site #11) that occurred in unit letter M (SW/4, SW/4), Section 34, Township 19 South, and Range 36 East. Dynegy Midstream Services, L.P. owns the pipeline, and retained Larson and Associates, Inc (LA) to investigate the vertical and lateral extent of the release. The investigation and findings were summarized in a report submitted to the New Mexico Oil Conservation Division (NMOCD) on February 28, 2002. Figure 1 presents a location and topographic map.

On March 11, 2003, March 15, 2002 and April 9, 2002, Chaparral Service, Inc., located in Eunice, New Mexico, was contracted by Dynegy to excavate soil from the leak site, which was hauled to a NMOCD approved commercial waste management facility (C & C Land Farm) located near Monument, New Mexico. The depth of the excavation ranged from 5 to 8 feet near the sides, to about 16 feet near the center and origin of the leak. Soil samples were collected from the sides and bottom of the excavation for field and laboratory analysis. The laboratory samples were placed in glass containers, labeled, chilled in an ice chest, and delivered under chain-of-custody control to Environmental Lab of Texas, Inc., located in Odessa, Texas. The laboratory analyzed the samples for total petroleum hydrocarbons (TPH) using method SW-846-8015 for gasoline range organics (GRO) and diesel range organics (DRO). Previous samples from the investigation reported no benzene, toluene, ethylbenzene and xylene (collectively referred to as BTEX) above regulatory limits. The field samples were analyzed using the ambient temperature headspace (ATH) method, which consists of partially filling a sample container with soil, covering the container opening with a layer of aluminum foil, and replacing the cap. The headspace of the sample containers was tested using a RAE Instruments photoionization detector (PID) after the samples had reached ambient temperature. The PID recorded the concentration of ionizable hydrocarbons in parts per million (ppm). Table 1 presents a summary of the field and laboratory analysis of soil samples. Appendix A presents the laboratory reports.

Referring to Table1, soil samples collected from the bottom, south, west and east sides of the excavation on March 11, 2004, reported TPH from 30.2 milligrams per kilogram (mg/kg), and 61.1 mg/kg. The field sample from the north side reported a PID reading of 243.2 ppm. On March 15,

Mr. Larry Johnson February 16, 2004 Page 2

2004, following removal of additional soil, a soil sample was collected from the north side of the excavation, and reported TPH at 7,460 mg/kg. On April 9, 2002, following removal of additional soil, a soil sample collected from the north side of the excavation reported TPH at 250 mg/kg. The landowner was satisfied with the remediation efforts, and the excavation was filled with clean soil. Dynegy requests closure for this Site. Appendix B presents photographs. Please contact Mr. Cal Wrangham with Dynegy at (432) 688-0542 or myself at (432) 687-0901 if you have questions. We may also be contacted by email at <u>Cal.Wrangham@Dynegy.com</u> or Mark@LAenvironmental.com. Sincerely,

Larson & Associates, Inc.

Mark J. Larson, CPG, CGWP President

Encl.

cc: Mr. Cal Wrangham - Dynegy Mr. Dave Harris - Dynegy **TABLES**

Summary of Headspace and Laboratory Analyses of Soil Samples SW/4, SW/4, Section 34, Township 19 South, Range 36 East Dynegy Midstream Services, L.P., Spill Site #11 Table 1

		Lea (Lea County, New Mexico	exico		Page 1 of 1
Date	Location	Depth	PID	GRO	DRO	HdT
		Feet (BGS)	(mqq)	C6 - C12	>C12 - C28	C6 - C28
				(mg/kg)	(mg/kg)	(mg/kg)
11-Mar-02	Bottom	16	61.1	<10	44.2	44.2
11-Mar-02	North	9	243.2	-	1	1
15-Mar-02		7	276.2	3120	4340	7460
09-Apr-02		∞	86.2	115	135	250
11-Mar-02	South	9	51.1	<10	43.1	43.1
11-Mar-02	East	5	30.2	<10	13.5	13.5
11-Mar-02	West	S	46.2	<10	11.8	11.8
Notes: Analysis	performed by En-	Notes: Analysis performed by Environmental Lab of Texas, Inc., Odessa, Texas	of Texas, Inc., Oc	lessa, Texas		

Sample depth in feet below ground surface Photoionization detector

Parts per million

Diesel-range organics

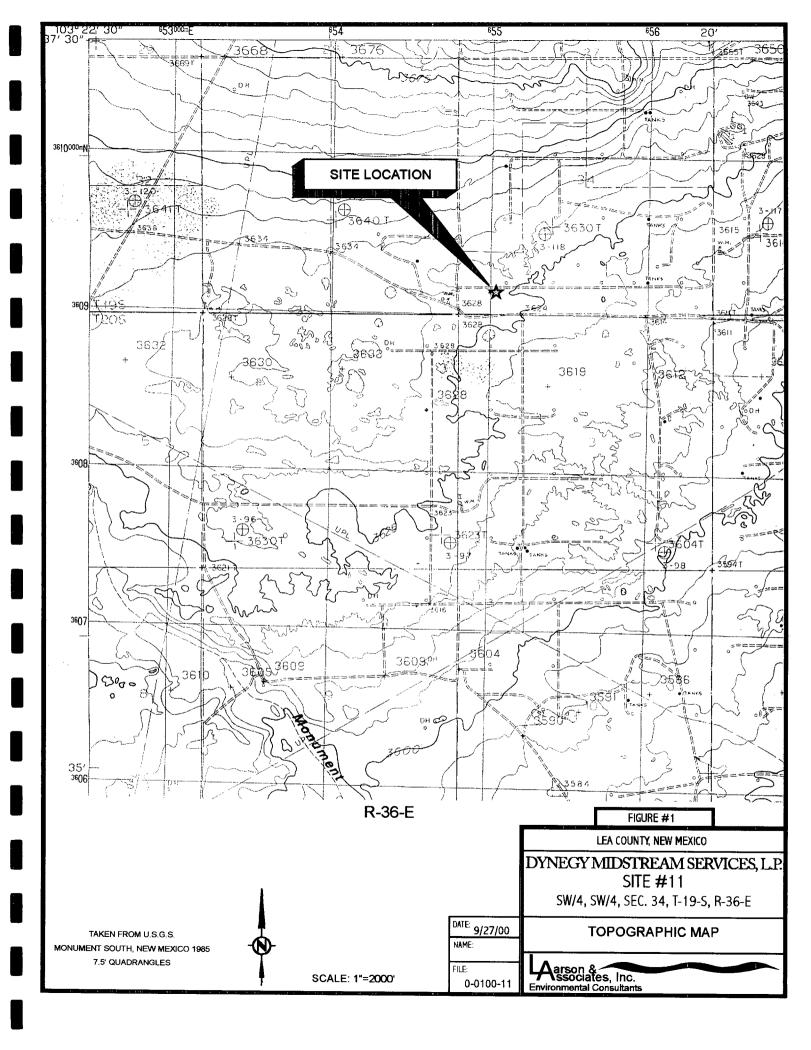
Gasoline-range organics

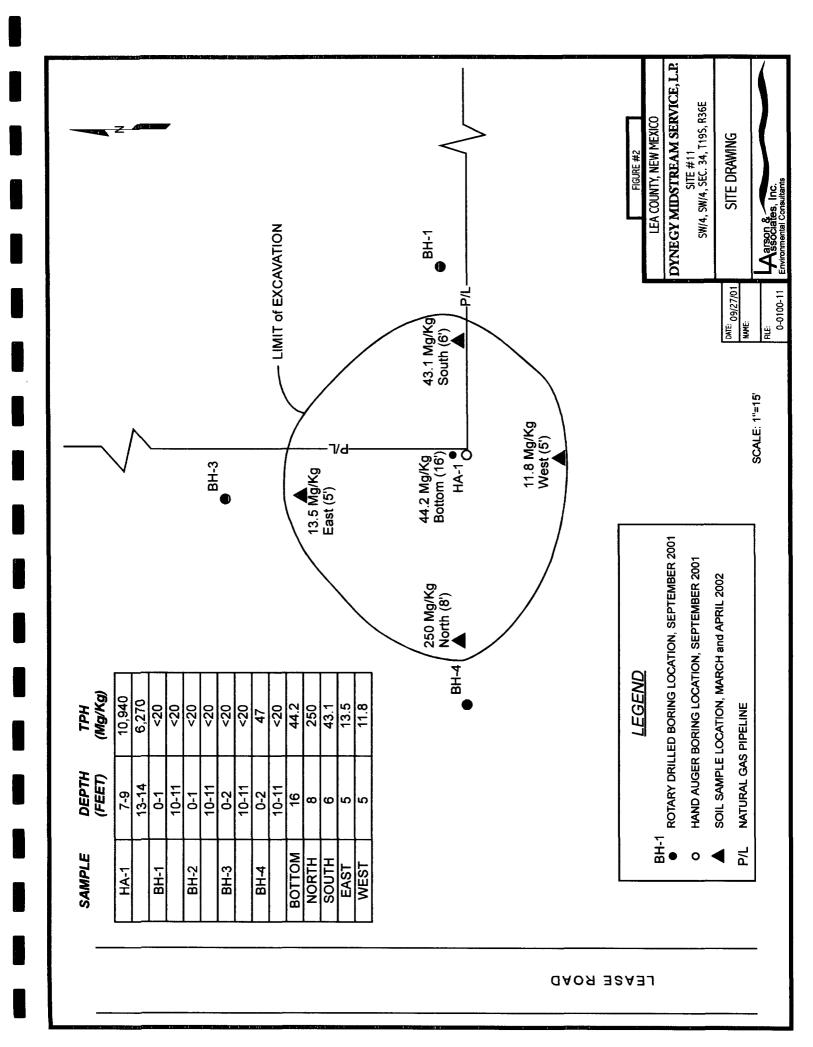
Total petroleum hydrocarbons (Sum of DRO + GRO)

Milligrams per kilogram

No data available Below method detection limit

FIGURES





APPENDIX A

Laboratory Reports

507 North Marienfeld, Suite 202 Midland, Texas 79701 Ph. (432) 687-0901 Fax (432) 687-0456

ANALYTICAL REPORT

Prepared for:

MARK LARSON LARSON AND ASSOCIATES, INC. P.O. BOX 50685 MIDLAND, TX 79710

Project:Dynegy-FosterOrder#:G0202801Report Date:03/13/2002

<u>Certificates</u> US EPA Laboratory Code TX00158

ENVIRONMENTAL LAB OF TEXAS SAMPLE WORK LIST

LARSON AND ASSOCIATES, INC. P.O. BOX 50685 MIDLAND, TX 79710 915-687-0456 Order#:G0202801Project:0-0100-11Project Name:Dynegy-FosterLocation:Lea County, NM

The samples listed below were submitted to Environmental Lab of Texas and were received under chain of custody. Environmental Lab of Texas makes no representation or certification as to the method of sample collection, sample identification, or transportation/handling procedures used prior to the receipt of samples by Environmental Lab of Texas.

			Date / Time	Date / Time		
<u>Sample :</u>	<u>Matrix:</u>		<u>Collected</u>	Received	Container	Preservative
Bottom	SOIL		03/11/2002 11:25	03/12/2002 8:00	4 oz glass	Ice
<u>b Testing:</u>	Rejected:	No	Tem	р: -1.0 С		
8015M TPH GRO/DRO	•					
West	SOIL		03/11/2002 11:30	03/12/2002 8:00	4 oz glass	Ice
<u>b Testing:</u>	Rejected:	No	Tem	p: -1.0 C		
8015M TPH GRO/DRO)					
South	SOIL		03/11/2002 11:45	03/12/2002 8:00	4 oz glass	Ice
<u>b Testing:</u>	Rejected:	No	Tem	p: -1.0 C		
8015M TPH GRO/DRO)					
East	SOIL		03/11/2002 11:50	03/12/2002 8:00	4 oz giass	Ice
<u>b Testing:</u>	Rejected:	No	Tem	p: -1.0 C		
8015M TPH GRO/DRC)					
	<u>b Testing:</u> 8015M TPH GRO/DRO West <u>b Testing:</u> 8015M TPH GRO/DRC South <u>b Testing:</u> 8015M TPH GRO/DRC East <u>b Testing:</u>	BottomSOILb Testing: 8015M TPH GRO/DRORejected: SOILWestSOILb Testing: 8015M TPH GRO/DRORejected: SOILSouthSOILb Testing: 8015M TPH GRO/DRORejected: SOILb Testing: 8015M TPH GRO/DROSOIL	BottomSOILb Testing:Rejected:No8015M TPH GRO/DROSOILWestSOILb Testing:Rejected:NoSouthSOILb Testing:Rejected:No8015M TPH GRO/DRONob Testing:Rejected:No8015M TPH GRO/DRONob Testing:Rejected:Nob Testing:Rejected:Nob Testing:SOILNob Testing:NoNo	Sample :Matrix:CollectedBottomSOIL03/11/2002 11:25b Testing:Rejected:NoTem8015M TPH GRO/DRO03/11/2002 11:3011:30b Testing:Rejected:NoTem8015M TPH GRO/DRO03/11/2002 11:3011:45b Testing:Rejected:NoTem8015M TPH GRO/DRO03/11/2002 11:4511:45b Testing:Rejected:NoTem8015M TPH GRO/DRO03/11/2002 11:4511:45b Testing:Rejected:NoTem8015M TPH GRO/DRO03/11/2002 11:4511:45b Testing:Rejected:NoTem8015M TPH GRO/DRO11:5011:50EastSOIL03/11/2002 11:5011:50	Sample : Matrix: Collected Received Bottom SOIL 03/11/2002 03/12/2002 b Testing: Rejected: No Temp: -1.0 C b Testing: Rejected: No Temp: -1.0 C 8015M TPH GRO/DRO SOIL 03/11/2002 03/12/2002 b Testing: Rejected: No Temp: -1.0 C 8015M TPH GRO/DRO SOIL 03/11/2002 03/12/2002 11:45 8:00 11:45 8:00 b Testing: Rejected: No Temp: -1.0 C b Testing: SOIL 03/11/2002 03/12/2002 11:50 8:00 11:50 8:00	Sample : Matrix: Collected Received Container Bottom SOIL 03/11/2002 03/12/2002 4 oz glass b Testing: Rejected: No Temp: -1.0 C b Testing: Rejected: No Temp: -1.0 C west SOIL 03/11/2002 03/12/2002 4 oz glass b Testing: Rejected: No Temp: -1.0 C south SOIL 03/11/2002 03/12/2002 4 oz glass b Testing: Rejected: No Temp: -1.0 C b Testing: Rejected: No Temp: -1.0 C b Testing: SOIL 03/11/2002 03/12/2002 4 oz glass https://doi.org/lib.org/lib.org/lib.org/lib.org/lib.org/lib.org/lib.org/lib.org/lib.org/lib.org/lib.org/lib.org/lib.org/lib.org/lib.org/lib.org/lib.

ENVIRONMENTAL LAB OF TEXAS ANALYTICAL REPORT

MARK LARSON Order#: G0202801 LARSON AND ASSOCIATES, INC. **Project:** 0-0100-11 P.O. BOX 50685 **Project Name: Dynegy-Foster** MIDLAND, TX 79710 Location: Lea County, NM

Lab ID:	
Sample ID:	

0202801-01 Bottom

	8015M TPH GRO/DRO												
Method <u>Blank</u>	Date <u>Prepared</u>	Date <u>Analyzed</u> 03/12/2002 14:13	Sample <u>Amount</u> 1	Dilution <u>Factor</u> 1	<u>Analyst</u> CK	<u>Metho</u> 8015							
	Parameter		Resi mg/		RL								
GI	RO, C6-C12		<1	0	10.0								
DI	RO, >C12-C28		44.	2	10.0								
To	tal C6-C28		44.	2	10.0								

Lab ID: Sample ID:

0202801-02 West

8015M TPH GRO/DRO

Aethod <u>Blank</u>	Date <u>Prepared</u>	Date <u>Analyzed</u> 03/12/2002 14:48	Sample <u>Amount</u> 1	Dilution <u>Factor</u> 1	<u>Analyst</u> CK	<u>Method</u> 8015
	Parameter		Resu mg/k		RL	
	GRO, C6-C12		<10		10.0	
	DRO, >C12-C28		11.8		10.0	
	Total C6-C28		11.8		10.0	

N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS ANALYTICAL REPORT

MARK LARSON	Order#:	G0202801
LARSON AND ASSOCIATES, INC.	Project:	0-0100-11
P.O. BOX 50685	Project Name:	Dynegy-Foster
MIDLAND, TX 79710	Location:	Lea County, NM

Lab ID:	
Sample ID:	

0202801-04 South

Method <u>Blank</u>	Date <u>Prepared</u>	Date <u>Analyzed</u> 03/12/2002 14:59	Sample <u>Amount</u> 1	Dilution <u>Factor</u> 1	<u>Analyst</u> CK	<u>Method</u> 8015
. [Parameter		Resu mg/k		RL	
	GRO, C6-C12		<10)	10.0	
	DRO, >C12-C28		43.1	1	10.0	
	Total C6-C28		43.1	[10.0	

Lab ID: 0202801-05 Sample ID: East

8015M	TPH GRO/DRO
_	

Method <u>Blank</u>	Date <u>Prepared</u>	Date <u>Analyzed</u> 03/12/2002 15:11	Sample <u>Amount</u> 1	Dilution <u>Factor</u> 1	<u>Analyst</u> CK	<u>Method</u> 8015
	Parameter		Result mg/kg		RL	
	GRO, C6-C12		<10		10.0	
	DRO, >C12-C28		13.5		10.0	
	Total C6-C28		13.5		10.0	

Kaland 3-19-02 Approval: Date

Raland K. Tuttle, Lab Director, QA Officer Celey D. Keene, Org. Tech. Director Jeanne McMurrey, Inorg. Tech. Director Irene Perry, QA Assistant Sandra Biezugbe, Lab Tech. Curt Cowdrey, Lab Tech. Sara Molina, Lab Tech.

N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS QUALITY CONTROL REPORT 8015M TPH GRO/DRO

Order#: G0202801

BLANK	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD	
Total C6-C28-mg/kg	0000832-02			<10			
MS	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD	
Total C6-C28-mg/kg	0202801-01	44.2	952	906	90.5%		
MSD	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD	
Total C6-C28-mg/kg	0202801-01	44.2	952	890	88.8%	1.8%	
SRM	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD	
Total C6-C28-mg/kg	0000832-05		1000	881	88.1%	0.%	

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ANALYTICAL REPORT

Prepared for:

MARK LARSON LARSON AND ASSOCIATES, INC. P.O. BOX 50685 MIDLAND, TX 79710

Project:Dynegy-FosterOrder#:G0202850Report Date:03/21/2002

<u>Certificates</u> US EPA Laboratory Code TX00158

ENVIRONMENTAL LAB OF TEXAS SAMPLE WORK LIST

LARSON AND ASSOCIATES, INC. P.O. BOX 50685 MIDLAND, TX 79710

915-687-0456

Order#:G0202850Project:0-0100-11Project Name:Dynegy-FosterLocation:Lea County, NM

The samples listed below were submitted to Environmental Lab of Texas and were received under chain of custody. Environmental Lab of Texas makes no representation or certification as to the method of sample collection, sample identification, or transportation/handling procedures used prior to the receipt of samples by Environmental Lab of Texas.

			Date / Time	Date / Time		
Lab ID:	<u>Sample :</u>	Matrix:	Collected	Received	Container	Preservative
0202850-01	N. Side	SOIL	03/15/2002 15:30	03/16/2002 11:00	4 oz glass	Ice
Lab	Testing:	Rejected: No	Temp	p: 1.5 C		
	8015M TPH GRO/DR	KO				

ENVIRONMENTAL LAB OF TEXAS ANALYTICAL REPORT

MARK LARSON	Order#:	G0202850
LARSON AND ASSOCIATES, INC.	Project:	0-0100-11
P.O. BOX 50685	Project Name:	Dynegy-Foster
MIDLAND, TX 79710	Location:	Lea County, NM

Lab ID:	
Sample ID:	

0202850-01 N. Side

Method <u>Blank</u>	Date <u>Prepared</u>	Date <u>Analyzed</u> 03/20/2002 20:23	PH GRO/DR Sample <u>Amount</u> 1	Dilution <u>Factor</u> 5	<u>Analyst</u> CK	<u>Method</u> 8015M
	Parameter		Result mg/kg		RL	
	GRO, C6-C12		3120	-	50.0	
	DRO, >C12-C28		4340		50.0	
	Total C6-C28		7460		50.0	

-21-02 3 Approval: Date

Raland K. Tuttle, Lab Director, QA Officer Celey D. Keene, Org. Tech. Director Jeanne McMurrey, Inorg. Tech. Director Irene Perry, QA Assistant Sandra Biezugbe, Lab Tech. Curt Cowdrey, Lab Tech. Sara Molina, Lab Tech.

N/A = Not Applicable RL = Reporting Limit

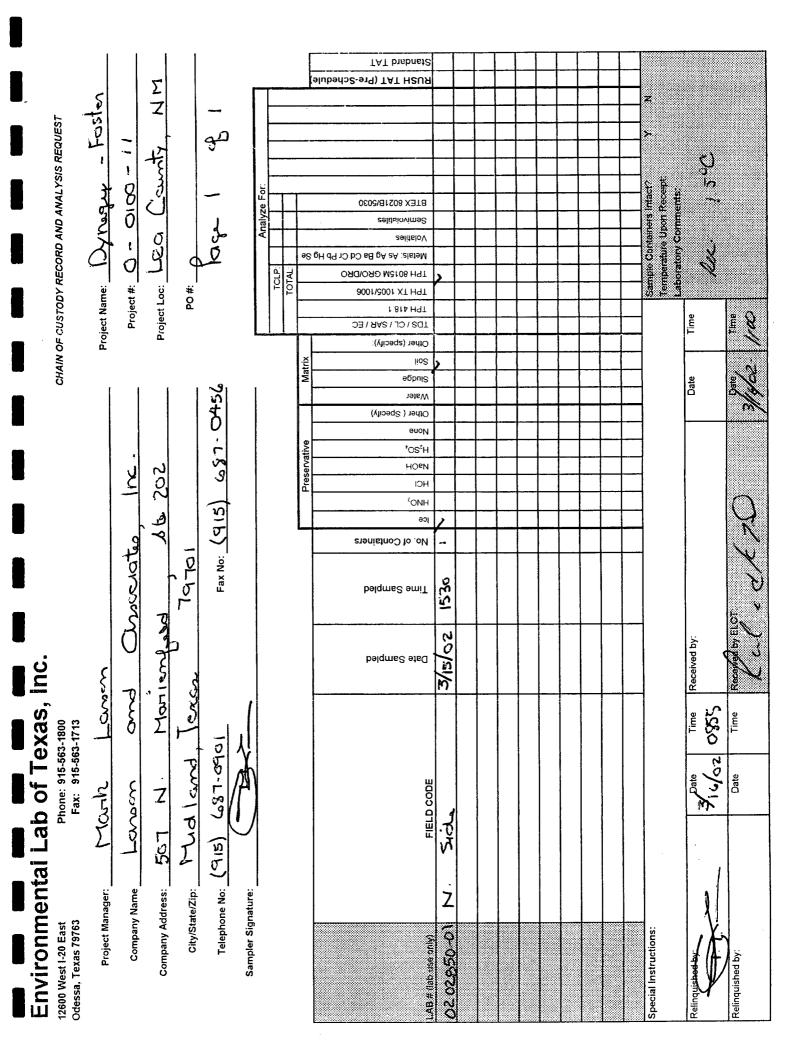
ENVIRONMENTAL LAB OF TEXAS I, LTD.

12600 West I-20 East, Odessa, TX 79765 Ph: 915-563-1800

ENVIRONMENTAL LAB OF TEXAS QUALITY CONTROL REPORT 8015M TPH GRO/DRO

Order#: G0202850

BLANK	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Total C6-C28-mg/kg	0000926-02			<10		
CONTROL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Total C6-C28-mg/kg	0000926-03		952	1065	111.9%	
CONTROL DUP	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Total C6-C28-mg/kg	0000926-04		952	1196	125.6%	11.6%
SRM	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Total C6-C28-mg/kg	0000926-05		1000	889	88.9%	0.%



ANALYTICAL REPORT

Prepared for:

MARK LARSON LARSON AND ASSOCIATES, INC. P.O. BOX 50685 MIDLAND, TX 79710

 Project:
 Dynegy- Site #11

 Order#:
 G0203039

 Report Date:
 04/17/2002

<u>Certificates</u> US EPA Laboratory Code TX00158

ENVIRONMENTAL LAB OF TEXAS SAMPLE WORK LIST

LARSON AND ASSOCIATES, INC. P.O. BOX 50685 MIDLAND, TX 79710

915-687-0456

Order#:G0203039Project:0-0100-11Project Name:Dynegy- Site #11Location:Lea County, NM

The samples listed below were submitted to Environmental Lab of Texas and were received under chain of custody. Environmental Lab of Texas makes no representation or certification as to the method of sample collection, sample identification, or transportation/handling procedures used prior to the receipt of samples by Environmental Lab of Texas.

			Date / Time	Date / Time		
🖬 Lab ID:	Sample :	Matrix:	Collected	Received	Container	Preservative
0203039-01	North Side	SOIL	4/9/02 11:00	4/10/02 8:40	8 oz Glass	ice
	<i>b Testing:</i> 8015M	Rejected: No	Ter	np: 0C		

ENVIRONMENTAL LAB OF TEXAS ANALYTICAL REPORT

MARK LARSON Order#: G0203039 LARSON AND ASSOCIATES, INC. **Project:** 0-0100-11 P.O. BOX 50685 **Project Name:** Dynegy- Site #11 MIDLAND, TX 79710 Location: Lea County, NM

Lab ID:	0203039-01
Sample ID:	North Side

North Side

			8015M			
Method <u>Blank</u>	Date Prepared	Date <u>Analyzed</u> 4/12/02	Sample <u>Amount</u> 1	Dilution <u>Factor</u> 1	<u>Analyst</u> CK	Method 8015M
	Parameter		Result mg/kg	·	RL	
	DRO, >C12-C35		115		10.0	
	GRO, C6-C12		135		10.0	
	TOTAL, C6-C35		250		10.0	

une 4/19/02 Approval:

Raland K. Tuttle, Lab Director, QA Officer Celey D. Keene, Org. Tech. Director Jeanne McMurrey, Inorg Tech. Director Sandra Biezugbe, Lab Tech. Sara Molina, Lab Tech.

N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS I, LTD.

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

8015M

Order#: G0203039

BLANK SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg	0001163-02			<10.0		·
CONTROL SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg	0001163-03	AN 7974 - 0	952	1029	108.1%	
CONTROL DUP	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg	0001163-04		952	1010	106.1%	1.9%
SRM SOIL	LAB-ID#	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg	0001163-05		1000	944	94.4%	• • •

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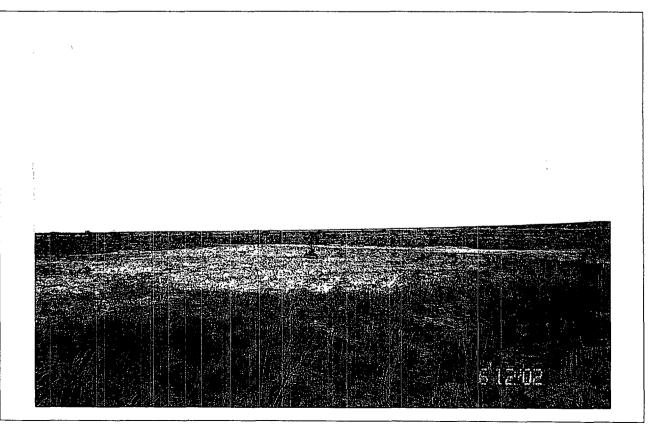
APPENDIX B

Photographs

Site #11 Dynegy Midstream Services, L.P. Unit Letter M, Section 34, Township 19 South, Range 36 East Lea County, New Mexico







2. Site #11 (Looking Southeast)

State of New Mexico Energy Minerals and Natural Resources

Form C-141 Revised October 10, 2003

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											
						OPERATOR Initial Report Final Report					
Name of Company: Targa Midstream Services, L.P.						Contact: Don Embrey					
Address: 6 Desta Drive, Suite 3300, Midland, TX 79705						Telephone No.: (432) 688-0546					
Facility Name: Foster 12" (Site #11)						Facility Type: Natural Gas Pipeline					
Surface Owner: Lloyd Foster Mineral Owner						Lease No.				In	
and a second						here a					
LOCATION OF RELEASE Unit Letter Section Township Range Feet from the North/South Line Feet from the East/West Line County: Lea											
N N	34	19S	36E	reet from the	NORUM		reet from the	East west Line		County: Lea	
Latitude: North 32° 36' 39.2" Longitude: West 103° 20' 55.4"											
NATURE OF RELEASE											
Type of Release: Natural Gas Liquids Source of Release: Pipeline Release										Volume Recovered" 0 bbl Date and Hour of Discovery:	
Source of Release: Pipeline Release							wn Unknown				
Was Immediate Notice Given?						If YES, To Whom?					
By Whom?						Date and Hour					
Was a Watercourse Reached?						If YES, Volume Impacting the Watercourse.					
If a Watercourse was Impacted, Describe Fully.*											
Describe Cause of Problem and Remedial Action Taken.* Release was due to corrosion of steel pipe. Corroded pipe was physosed and replaced with poly pipe. Soil samples were collected and analyzed to determine BTEX, TPH and chloride concentrations. Soil was excepted from affected area to achieve OCD recommended remediation action level and hauled to OCD permitted commercial landfarm (Jimmy Cooper). Excavation was filled with clean soil.											
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: Cillingum							OIL CONSERVATION DIVISION				
Signature:	w	WMY									
						Approved by District Supervisor:					
Title: Regior	Title: Region Advisor					Approval Da	te:	Expiration Da		Date:	
E-mail Address: dembrey@targaresources.com Date: May 10, 2006 Phone: (432) 688-0546						Conditions of Approval:				Attached	
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