

## Basin Environmental Consulting, LLC

2800 Plains Highway  
P. O. Box 381  
Lovington, New Mexico 88260  
[cjbryant@basin-consulting.com](mailto:cjbryant@basin-consulting.com)  
Office: (575) 396-2378 Fax: (575) 396-1429



October 6, 2009

RE: B.O.P.C.O., L.P.  
Looms & Torry Fed Comm #1  
Lea County, New Mexico  
Unit Letter "E" (SW/NW) Sec.5, T21S, R32E

**RECEIVED**

OCT 08 2009

**HOBBSOCD**

Mr. Leking,

Basin Environmental Consulting, LLC (Basin), on behalf of B.O.P.C.O., L.P. (BOPCO), is pleased to submit this remediation proposal for the Looms & Torry Fe. Comm #1 release site. On September 3, 2009, BOPCO collected soil samples to delineate the visually impacted area associated with daily operations of the above referenced compressor station. The visually impacted area measures approximately fifteen (15) feet in width and thirty (30) feet in length.

According to data obtained from the New Mexico Office of the State Engineer (NMOSE), no water wells are recorded in Section 5 of the above referenced township and range. According to a depth to groundwater reference map utilized by the New Mexico Oil Conservation Division (NMOCD), groundwater should be encountered at approximately 150 feet below ground surface (bgs). This inferred depth to groundwater results indicate a score of zero (0) points being assigned to the release site based on this criteria. There are no water wells or surface water bodies located within 1,000 feet of the release site. Based on the NMOCD ranking system, zero (0) points will be assigned to the site as a result of the criteria. The *Guidelines for Remediation of Leaks, Spills and Releases* (NMOCD, 1993) indicates the release site has a ranking score of zero (0). Based on this score, the soil remediation levels for a release site with a ranking score of zero (0) points are as follows:

- Benzene-10 mg/Kg (ppm)
- BTEX- 50 mg/Kg (ppm)
- TPH-5,000 mg/Kg (ppm)

BOPCO has removed the compressor from the location and collected three (3) soil samples (Surface Composite, 1 Ft. BGS and 2 Ft. BGS) from the soil beneath and adjacent to the compressor area. The soil sample "Surface Composite" was submitted to

the laboratory and analyzed for concentrations of benzene, toluene, ethylbenzene and total xylene (BTEX) using method SW-846 1311/8021B (TCLP), total petroleum hydrocarbons (TPH) using method SW-846 8015M, RCRA Metals using methods EPA 600/4-91/010-1311, reactivity, corrosivity and ignitability (RCI) using method EPA SW-846 7.3, 7.2, 1010A (ASTM D 93-80), 1311, 40 CFR 261.

The laboratory analytical results indicated a benzene concentration of 0.042 mg/L, a BTEX concentration of 0.088 mg/L and a TPH concentration of 724 mg/Kg for soil sample "Surface Composite". The analytical results indicated concentrations of silver, cadmium, chromium, mercury, lead, selenium, sulfide and cyanide were less than the appropriate laboratory method detection limits (MDL) for soil sample "Surface Composite". The analytical results indicated an arsenic concentration of 0.10 mg/L, a barium concentration of 1.48 mg/L, a pH of 8.67 and ignitability of greater than 140° F for soil sample "Surface Composite".

On September 3, 2009, two (2) soil samples (1 Ft. BGS and 2 Ft. BGS) were collected and submitted the laboratory and analyzed for concentrations of TPH using method SW-846 8015M. The laboratory analytical results indicated TPH concentrations ranged from 170 mg/Kg for soil sample 2 Ft. BGS to 494 mg/Kg for soil sample 1 Ft. BGS.

Based on the analytical results, BOPCO proposes the following activities designed to progress the Looms & Torry Fed Comm #1 Compressor site toward an NMOCD approved closure:

- BOPCO proposes to excavate the area beneath and adjacent to the previously removed compressor to approximately one (1) foot bgs. The excavated soil will be transported to CRI (NMCOD permit # NM-01-0006 ), for disposal.
- Confirmation soil samples will be collected and submitted to the laboratory and analyzed for concentrations of BTEX using EPA method 8021b and TPH using SW-846 8015M. On receipt of favorable laboratory analytical results indicating BTEX and TPH concentrations are less than NMOCD regulatory guidelines, the excavation will be backfilled with non-impacted soil from the surrounding area. Following backfilling activities the surface will be contoured to fit the surrounding topography.

If you should have any questions or comments, please contact me at 575-605-7210.

Sincerely,



Camille Bryant

Basin Environmental Consulting, LLC

Attachments: Laboratory analytical reports





# ARDINAL LABORATORIES

PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

September 16, 2009

Tony Savoie  
B.O.P.C.O. LP  
522 West Mermod, Suite 704  
Carlsbad, NM 88220

Re: Looms & Torry Fed Comm #1 Compressor

Enclosed are the results of analyses for sample number H18173, received by the laboratory on 09/03/09 at 10:03 am.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method SW-846 8260	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method TX 1005	Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.2	Regulated VOCs (V2, V3)

Accreditation applies to public drinking water matrices.

Total Number of Pages of Report: 6 (includes Chain of Custody)

Sincerely,

Celey D. Keene  
Laboratory Director



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR  
B.O.P.C.O. LP  
ATTN: TONY SAVOIE  
522 WEST MERMOD, SUITE 704  
CARLSBAD, NM 88220

Receiving Date: 09/03/09  
Reporting Date: 09/14/09  
Project Number: CLT-09-04  
Project Name: LOOMS & TORRY FED COMM #1 COMPRESSOR  
Project Location: EAST OF CARLSBAD

Sampling Date: 09/03/09  
Sample Type: SOIL  
Sample Condition: COOL & INTACT 2.5°C  
Sample Received By: ML  
Analyzed By: HM/AB

LAB NO.	SAMPLE ID	REACTIVITY			
		Sulfide (ppm)	Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY (°F)
ANALYSIS DATE:		09/14/09	09/14/09	09/08/09	09/03/09
H18173-1	SURFACE	< 0.010	< 0.100	8.67	> 140
	COMPOSITE				
Quality Control		NR	NR	7.03	79
True Value QC		NR	NR	7.00	80 +/- 2
% Recovery		NR	NR	100	98.8
Relative Percent Difference		NR	NR	0.3	< 0.1

METHOD: EPA SW-846 7.3, 7.2, 1010A (ASTM D 93-80), 1311, 40 CFR 261

Chemist

Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.





PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR  
B.O.P.C.O. LP  
ATTN: TONY SAVOIE  
522 WEST MERMOD, SUITE 704  
CARLSBAD, NM 88220

Receiving Date: 09/03/09  
Reporting Date: 09/16/09  
Project Number: CPT-09-04  
Project Name: LOOMS & TORRY FED COMM #1 COMPRESSOR  
Project Location: EAST OF CARLSBAD

Sampling Date: 09/03/09  
Sample Type: SOIL  
Sample Condition: COOL & INTACT 2.5°C  
Sample Received By: ML  
Analyzed By: JM

### TCLP RCRA METALS

LAB NO.	SAMPLE ID	As (mg/L)	Ag (mg/L)	Ba (mg/L)	Cd (mg/L)	Cr (mg/L)	Pb (mg/L)	Hg (mg/L)	Se (mg/L)
---------	-----------	--------------	--------------	--------------	--------------	--------------	--------------	--------------	--------------

ANALYSIS DATE:	09/15/09	09/15/09	09/15/09	09/15/09	09/15/09	09/15/09	09/11/09	09/15/09
EPA LIMITS:	5	5	100	1	5	5	0.2	1
H18173-1 SURFACE COMPOSITE	0.10	<0.01	1.48	<0.01	<0.01	<0.05	<0.0002	<0.20
Quality Control	5.01	0.52	2.45	2.46	2.56	5.18	0.0020	10.2
True Value QC	5.00	0.50	2.50	2.50	2.50	5.00	0.0020	10.0
% Recovery	100	104	98.0	98.4	102	104	100	102
Relative Standard Deviation	2.2	1.8	<0.1	0.9	<0.1	0.9	4.9	0.4

[illegible]

Analyses subcontracted to Green Analytical Laboratories, a subsidiary of Cardinal Laboratories.

Chemist

Date \_\_\_\_\_

H18173TM BOPCO

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. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



# ARDINAL LABORATORIES

PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR  
B.O.P.C.O. LP  
ATTN: TONY SAVOIE  
522 WEST MERMOD, SUITE 704  
CARLSBAD, NM 88220

Receiving Date: 09/03/09  
Reporting Date: 09/14/09  
Project Number: CPT-09-04  
Project Name: LOOMS & TORRY FED COMM #1  
COMPRESSOR  
Project Location: EAST OF CARLSBAD, NM

Sampling Date: 09/03/09  
Sample Type: SOIL  
Sample Condition: COOL & INTACT @ 2.5°C  
Sample Received By: ML  
Analyzed By: CK


LAB NUMBER	SAMPLE ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/kg)	DRO (>C <sub>10</sub> -C <sub>28</sub> ) (mg/kg)
------------	-----------	--	--


ANALYSIS DATE:		09/07/09	09/07/09
H18173-1	SURFACE COMPOSITE	154	570
H18173-2	1 FT. BGS	<10.0	494
H18173-3	2 FT. BGS	<10.0	170
Quality Control		439	388
True Value QC		500	500
% Recovery		87.8	77.6
Relative Percent Difference		1.7	<0.1

METHOD: SW-846 8015 M. Reported on wet weight.

Not accredited for GRO/DRO.

\*Surrogate for H18173-1 DRO outside historical limits due to matrix interference.

  
Chemist

  
Date

H18173 T BOPCO

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. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.





PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR  
B.O.P.C.O. LP  
ATTN: TONY SAVOIE  
522 WEST MERMOD, SUITE 704  
CARLSBAD, NM 88220

Receiving Date: 09/03/09  
Reporting Date: 09/09/09  
Project Number: CLT-09-04  
Project Name: LOOMS & TORRY FED COMM #1 COMPRESSOR  
Project Location: EAST OF CARLSBAD

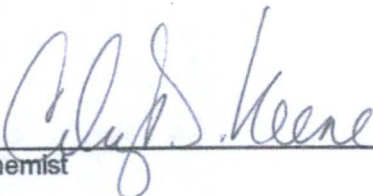
Sampling Date: 09/03/09  
Sample Type: SOIL  
Sample Condition: COOL & INTACT @ 2.5°C  
Sample Received By: ML  
Analyzed By: ZL

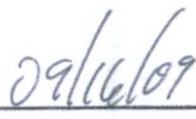
**TCLP**

LAB NO.	SAMPLE ID	TCLP			
		BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE:		09/08/09	09/08/09	09/08/09	09/08/09
H18173-1	SURFACE COMPSITE	0.042	0.029	0.001	0.016
Quality Control		0.056	0.056	0.051	0.166
True Value QC		0.050	0.050	0.050	0.150
% Recovery		112	112	102	111
Relative Percent Difference		7.8	6.1	4.3	6.7

METHODS: BTEX - SW-846 1311/8021B.

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE,  
AND TOTAL XYLENES.

  
\_\_\_\_\_  
Chemist

  
\_\_\_\_\_  
Date

H18173 BTEX BOPCO

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. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



# CARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240

(575) 393-2326 Fax (575) 393-2476

Page \_\_\_\_ of \_\_\_\_

## BILL TO

## ANALYSIS REQUEST

Company Name: **BOPCO LP**

Project Manager: **Tony Savio**

Address: **522 W. Marland, Suite 704**

City: **Carlsbad** State: **NM** Zip: **88220**

Phone #: **432-556-8730** Fax #: **575-887-7413**

Project #: **ELT-09-04** Project Owner:

Project Name: **Leemsterry Fld Comm #1 Compressor**

Project Location: **East of Carlsbad**

Sample Name: **by Savio**

FOR LAB USE ONLY

Lab I.D. Sample I.D.

H181731  
-2 Surface Composite  
-3 2 Ft. BGS

(G)RAB OR (C)OMP.  
# CONTAINERS  
GROUNDWATER  
WASTEWATER  
SOIL  
OIL  
SLUDGE  
OTHER:  
ACID/BASE:  
ICE / COOL  
OTHER:

MATRIX

PRESERV

SAMPLING

DATE  
TIME

9/30/09 0815  
✓ 0755  
✓ 0800

8015m Extended  
8021B BTEX TCLP  
RCI  
TCLP Metals (8)

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 the client for the 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 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.

Sampler Relinquished:

Date: **9-30-09**

Received By:

Relinquished By:

Date: **10-03-09**

Received By:

Time:

Delivered By: (Circle One)

Temp.

Sample Condition  
Cool ☒ Intact ☒  
Yes ☒ No ☒

CHECKED BY: (Initials)

Sampler - UPS - Bus - Other:

**250**

☒ Yes ☒ No

**4089**

Phone Result: ☐ No Add'l Phone #:   
Fax Result: ☐ No Add'l Fax #:   
REMARKS:

† Cardinal cannot accept verbal changes. Please fax written changes to 575-393-2476.

#240