

ABATEMENT PLAN

**SUBSURFACE INVESTIGATION REPORT
(STAGE 1 ABATEMENT PLAN)**

FILE

**EOTT ENERGY CORP
R. L. ROGERS RELEASE SITE
LEA COUNTY, NEW MEXICO**

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Prepared For:
EOTT Energy Corp
5805 East Highway 80
Midland, Texas 79701

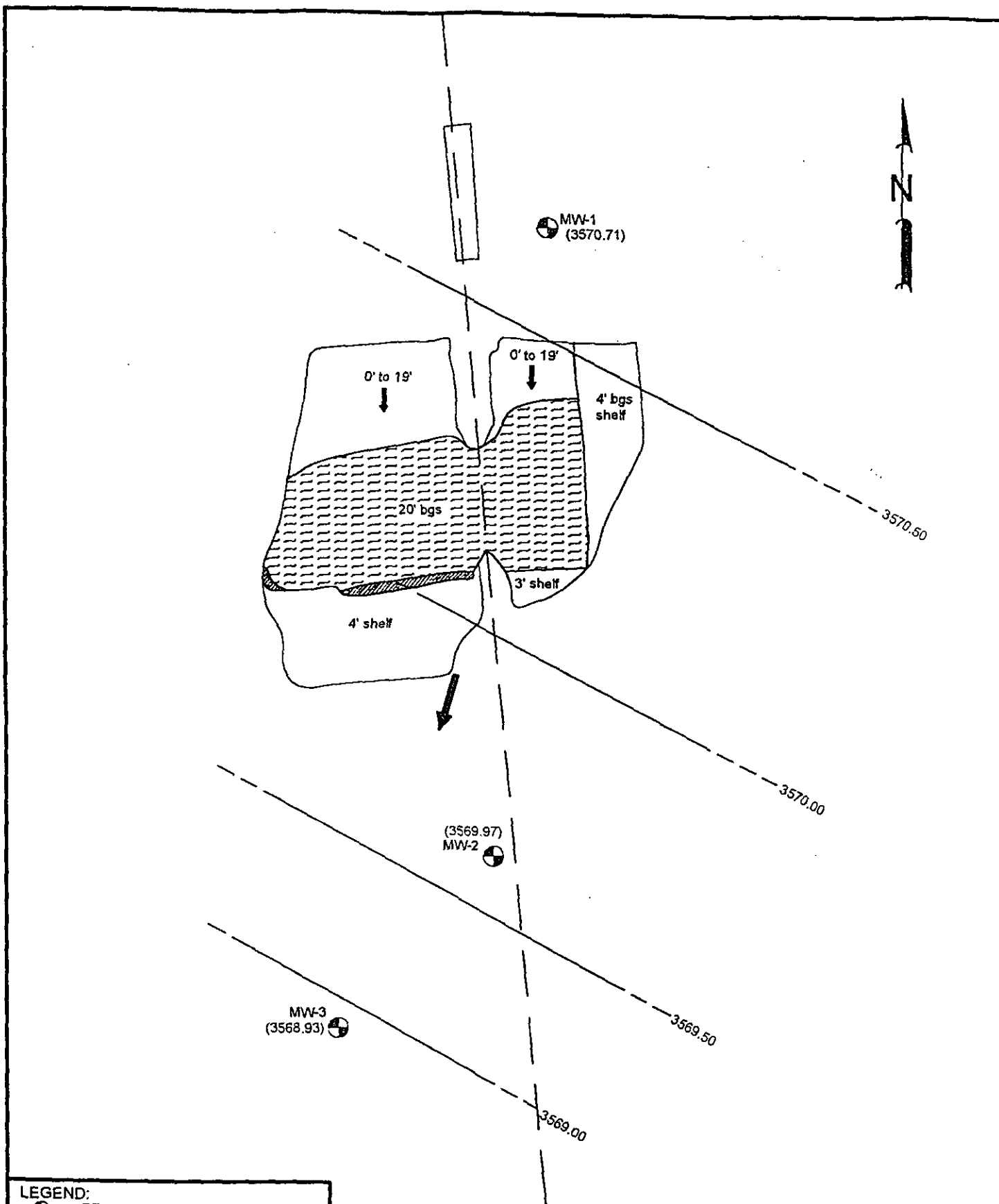
ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

Environmental Technology Group, Inc. Project No. EOT1041C

Prepared By:
Environmental Technology Group, Inc.
4600 West Wall Street
Midland, Texas 79703

May 2000

Revised: June 2000



LEGEND:







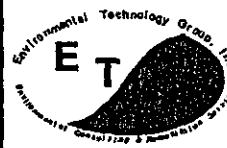
-  ETGI Monitoring Well Locations
-  EOTT Pipeline
-  Excavation Area
-  Groundwater
-  Ground Water Contour Lines
-  Ground Water Elevations (in feet)

Figure 3
Inferred Ground Water
Gradient Map
EOTT Energy Corp.
R. L. Rodgers
Lea County, NM



**Environmental Technology
Group, INC.**

Scale: 1" = 60'	Prep By: RS	Checked By: MVS
May 4, 2000	ETGI Project # EOT 1041C	

A Report Prepared for:

EOTT Energy Corp
5805 East Highway 80
Midland, Texas 79701

Subsurface Investigation Report
(Stage 1 Abatement Plan)

Environmental Technology Group, Inc. Project No. EOT1041C

Prepared by:

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4600 West Wall Street
Midland, Texas 79703

May 2000

Revised: June 2000

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1.0 INTRODUCTION AND SITE BACKGROUND

The site is located approximately two miles west of the town of Monument, New Mexico, in the NE 1/4 of the NW 1/4 Section 32, Township 19 South, Range 37 East. A site location map is provided as Figure 1.

The topography of the site is relatively flat with a slight topographic slope to the south. The site is located in a rural/residential area with a residence located approximately 800 feet to the north. Generally, the surface consists of unconsolidated sand covered by sparse grasses and mesquite trees. There are no structures or facilities at the site and the only site features are the excavation and monitoring wells as depicted on Figure 2, the Site Map.

The excavation was made under the direct supervision of EOTT Energy Corp. (EOTT). Any questions regarding this feature should be directed to Mr. Wayne Brunette of EOTT. At the request of EOTT, Environmental Technology Group, Inc. (ETGI) completed three borings as monitoring wells around an existing excavation and collected confirmation side wall samples as discussed below.

2.0 GEOLOGY/HYDROGEOLOGY

In the site vicinity, the surface is composed of unconsolidated, wind blown sands and finer materials associated with the Tertiary Ogallala Formation, which serves as a major aquifer for southeastern New Mexico and several high plains states. Alluvial, unconfined ground water is typically present in these sands at varying depths and generally flows from the north to the south. These aquifers are typically characterized by relatively high hydraulic conductivity and transmissivity.

The Ogallala is underlain by the Triassic Dockum Formation, commonly referred to as the "red beds". While there are sand lenses within the Dockum, it is more typically characterized by red silts and shales in which detectable ground water is often absent or limited in extent. Where ground water is present, the aquifer is usually characterized by relatively low hydraulic conductivity and transmissivity.

At the site, the subsurface is composed of approximately 20 feet of sand and caliche which unconformably overlies a horizon of red clay. The red clay corresponds to the Dockum Formation or "red beds". The top of the Dockum Formation represents an erosional surface on which the sands were later deposited. Areas of thick sand sections correspond to areas of greater erosion of the Dockum.

The ground water table occurs near the interface of sand and clay at the site. Monitoring wells completed in that portion of the site area where the ground water occurs within the sand are characterized by high recharge rates and the measured hydraulic conductivity is high. Monitoring wells completed in that portion of the site where the ground water occurs in the red clay are characterized by slow recharge rates and low hydraulic conductivity.

3.0 RECENT FIELD ACTIVITIES

Three borings were completed as monitoring wells at the site in order to characterize the ground water conditions around an existing excavation. The drilling activities were conducted on February 7, 2000. The location of these borings, and the excavation, are depicted on Figure 2.

The soil borings were advanced with an air-rotary drilling rig operated by Eades Drilling, Inc. of Hobbs, New Mexico. During the boring process, soil samples were collected at five foot intervals with a split spoon sampling tool when possible. A portion of all of the soil samples were field screened with a photoionization detector (PID) and the remainder was placed in a laboratory cleaned, four ounce soil sample jar. Soil samples with the highest PID reading in each boring, and the sample nearest to the water table, were submitted for laboratory analysis.

The monitoring wells were developed on February 9, 2000. The depth to water was measured on February 22 and April 5, 2000 and ground water samples were collected on February 23 and April 5, 2000. In addition, a ground water sample was collected from the excavation on February 29, 2000. The depth to ground water and ground water elevations are provided as Table 2 and a ground water gradient map is provided as Figure 3. The ground water chemistry is provided as Tables 3 and 4. For reference, the benzene, toluene, ethylbenzene and xylenes (BTEX) concentrations are posted on Figure 4. All laboratory reports are provided as Appendix B.

On May 3, 2000, eight sidewall soil samples were collected from the excavation walls and submitted for laboratory analysis. The soil samples were collected from immediately above the water table at a depth of 17' bgs at the approximate locations shown on Figure 5. The soil chemistry data, for both the borings and sidewall samples, are provided in Table 1 and the soil boring logs are provided as Appendix A.

All soil samples selected for laboratory analysis were subjected to total petroleum hydrocarbon (TPH) analysis using EPA Method 8015M GRO/DRO. All ground water samples were analyzed for BTEX using EPA Method 8021B, 5030. Ground water samples were also subjected to analysis of selected semi-volatile organic compounds (SVOC), and selected metals, chlorides, sulfates, carbonates, bicarbonates and total dissolved solids (TDS) as required by the New Mexico Oil Conservation Division (OCD). All laboratory results are provided as Appendix B.

4.0 RESULTS

4.1 NEW MEXICO OIL CONSERVATION (OCD) SOIL CLASSIFICATION

During the site investigation, Highly Contaminated/Saturated Soils, as described by the OCD Guidelines, were not detected in the soil borings/monitoring wells or the excavation. Laboratory analysis of one sample collected from the excavation wall contained adsorbed phase hydrocarbons with a TPH-DRO concentration of 290 mg/kg.

The depth to ground water, as measured from the well head casing, ranges from 15.5 feet bgs in monitoring well MW-3 to 24.5 feet bgs in monitoring well MW-1. Therefore, the OCD ranking score of 20 must be assigned to the site. In addition, a water supply well is located approximately 800 feet to the northeast, also confirming the OCD ranking score of 20. There are no surface water bodies within 200 feet of the site.

4.2 DISTRIBUTION OF HYDROCARBONS IN SOIL

No evidence of petroleum impact was observed in the unsaturated zone at the boring locations. Low concentrations of xylenes were observed in soil samples collected at the water table from the borings later completed as monitoring wells MW-2 and MW-3. These concentrations were below regulatory limits. The concentrations of TPH from these samples were below the detection limit. Soil samples collected from the walls of the existing excavation revealed BTEX levels below detection limits except in two samples. Samples SS04 and SS06 had toluene and/or m,p-Xylene slightly above detection limits but well below regulatory levels. The concentrations of TPH-GRO in all eight soil samples were below detection limits. The concentration of TPH-DRO in six soil samples were below detection limits. Sample SS05 exhibited a TPH-DRO concentration of 10 mg/kg, which is well below regulatory levels. Sample SS04 exhibited TPH-DRO concentration of 290 mg/kg, which is above regulatory levels for a site with an OCD ranking of 20. Sample SS04 is located directly beneath the pipeline on the south wall as shown in Figure 5.

4.3 DISTRIBUTION OF HYDROCARBONS IN GROUND WATER

The ground water gradient slopes to the southeast at a gradient of 0.005 feet per foot as depicted on Figure 3. Dissolved phase concentrations of BTEX were either below detection limits or below maximum contaminant levels (MCLs) with one exception. Dissolved phase benzene, at a concentration of 6 ug/L, was detected in the sample collected from monitoring well MW-3, the most downgradient well, on February 23, 2000. However, the benzene concentration, in the sample from this well on April 5, 2000, was below OCD and MCL levels for benzene. Dissolved phase SVOC were below the detection limit at all of the monitoring well locations.

Dissolved phase concentrations of BTEX were below the detection limit for the sample collected from the excavation. Dissolved phase concentrations of volatile organic compounds (VOC), EPA Method 8260, were also below detection limits

5.0 SUMMARY AND CONCLUSIONS

No evidence of petroleum impact was observed in the unsaturated zone at the boring locations. Concentrations of BTEX in soil samples collected at the water table from the borings were below regulatory limits. The concentrations of TPH from these samples were below the detection limit. One sample of petroleum impacted soil was collected from the south excavation wall at 17' bgs directly beneath the pipeline.

As is common to the area, the ground water gradient slopes to the southeast at a gradient of 0.005 feet per foot. Dissolved phase concentrations of BTEX were either below detection limits or below MCL with one exception. Dissolved phase benzene, at a concentration of 6 ug/L, was detected in the sample collected from monitoring well MW-3, the most downgradient well, on February 23, 2000. However, the benzene concentration, in the sample from this well collected on April 5, 2000, was below OCD and MCL levels for benzene. Dissolved phase SVOC were below the detection limit at all of the monitoring well locations.

Dissolved phase concentrations of BTEX were below the detection limit for the sample collected from the excavation. Dissolved phase concentrations of VOC (EPA Method 8260) were also below detection limits.

6.0 RECOMMENDATIONS

ETGI recommends that portion of the excavation, adjacent to the clean side wall samples, be backfilled with clean material such that the pipeline integrity in the currently exposed portion can be maintained. The backfill should incorporate a confining /impermeable clay like cap (minium of three feet in thickness above the top of the aquifer) in order to prevent the development or existence of preferential pathways to the ground water. The backfill material in this portion of the excavation will allow the impacted soil, located under the pipeline in the southern portion of the site, to be excavated and treated ex situ or subject to disposal.

It is recommended that no active abatement of ground water be conducted at the site. Ground water monitoring from all monitoring wells should continue for one year in order to demonstrate the following.

- Ground water concentrations remain below MCL in monitoring wells MW-1 and MW-2.
- Benzene concentrations in monitoring well MW-3 demonstrate reductions below MCL, by way of natural attenuation.

Following the successful conclusion of ground water monitoring activities it is recommended that ground water monitoring be discontinued and final closure of the site be completed through the New Mexico Oil Conservation Division.

7.0 MONITORING PLANS

All site monitoring wells will be gauged and sampled on a quarterly basis. Each well will be measured for the depth to groundwater. All of the groundwater monitoring wells will be purged and sampled for BTEX and TPH.

After purging the wells, groundwater samples will be collected with a disposable Teflon sampler and polyethylene liner by personal wearing clean, disposable gloves.

Groundwater sample containers will be filled in the order of decreasing volatilization sensitivity (i.e., BTEX containers will be filled first and TPH containers second).

Groundwater samples collected for BTEX analysis will be placed in 40 ml glass VOA vials equipped with Teflon line caps. The containers will be provided by the analytical laboratory. The vials will be filled to a positive meniscus, sealed, and visually checked to ensure the absence of air bubbles. The containers will be provided by the analytical laboratory.

The filled containers will be labeled and placed on ice in an insulated cooler. The cooler will be sealed for transportation to the analytical laboratory. Proper chain-of-custody documentation will be maintained throughout the sampling process.

The groundwater samples will be analyzed as follows:

- BTEX concentrations in accordance with EPA Method 8020, 5030
- TPH concentrations in accordance with modified EPA Method 8015-GRO/DRO

The quarterly data will be compiled and summarized in an annual report. The annual report will be submitted prior to April 1, 2001

8.0 SCHEDULE OF ACTIVITIES

The quarterly sampling event is scheduled for the first week of July 2000. Subsequent quarterly sampling events will be conducted in October 2000, January and April 2001.

9.0 QUALITY ASSURANCE/QUALITY CONTROL (QA/QC) PROCEDURES

9.1 Soil Sampling

Samples of subsurface soils were obtained utilizing either a split spoon sampler (air rotary drilling rig) or a two inch, continuous sampling tube with a clean polybuterate liner (geoprobe). Representative soil samples were divided into two separate portions using clean, disposable gloves and clean sampling tools. One portion of the soil sample was placed in a disposable sample bag. The bag was labeled and sealed for head space analysis using a PID calibrated to a 100 ppm isobutylene standard. Each sample was allowed to volatilize for approximately 30 minutes at ambient temperature prior to conducting the analysis.

The other portion of the soil sample was placed in a sterile glass container equipped with a Teflon lined lid furnished by the analytical laboratory. The container was filled to capacity to limit the amount of head space present. Each container was labeled and placed on ice in an insulated cooler. Upon selection of samples for analysis, the cooler was sealed for shipment to the laboratory. Proper chain-of-custody documentation was maintained throughout the sampling process.

Soil samples were delivered to Environmental Lab of Texas, Inc. in Midland, Texas for BTEX and TPH analyses using the methods described below. Soil samples were analyzed for BTEX and TPH-GRO/DRO within 14 days following the collection date.

The soil samples were analyzed as follows:

- BTEX concentrations in accordance with EPA Method 8021B, 5030
- TPH concentrations in accordance with modified EPA Method 8015-GRO/DRO

9.2 Ground Water Sampling

Monitoring wells were developed and purged with a clean PVC bailer. The bailer was cleaned prior to each use with Liqui-Nox[®] detergent and rinsed with distilled water. Monitoring wells with sufficient recharge were purged by removing a minimum of three well volumes. Monitoring wells that did not recharge sufficiently were purged until no additional ground water can be obtained.

After purging the wells, ground water samples were collected with a disposable Teflon sampler and polyethylene liner by personnel wearing clean, disposable gloves. Ground water sample containers were filled in the order of decreasing volatilization sensitivity (i.e., BTEX containers were filled first and polynuclear aromatic hydrocarbons (PAH) containers second.

Ground water samples collected for BTEX analysis were placed in 40 ml glass VOA vials equipped with Teflon lined caps. The containers were provided by the analytical laboratory. The vials were filled to a positive meniscus, sealed, and visually checked to ensure the absence of air bubbles.

Ground water samples collected for PAH analysis were filled to capacity in sterile, one liter glass containers equipped with Teflon lined caps. Ground water samples collected for metals analysis were filled to capacity in sterile, one liter plastic containers equipped with Teflon lined caps. The containers were provided by the analytical laboratory.

The filled containers were labeled and placed on ice in an insulated cooler. The cooler was sealed for transportation to the analytical laboratory. Proper chain-of-custody documentation was maintained throughout the sampling process.

The ground water samples were analyzed as follows:

- BTEX concentrations in accordance with EPA Method 8021B, 5030
- TPH concentrations in accordance with modified EPA Method 8015-GRO/DRO

9.3 Decontamination Of Equipment

Cleaning of drilling equipment was the responsibility of the drilling company. In general, the cleaning procedures consisted of using high pressure steam to wash the drilling and

sampling equipment prior to drilling and prior to starting each hole. Prior to use, the sampling equipment will be cleaned with Liqui-Nox® detergent and rinsed with distilled water.

9.4 Laboratory Protocol

The laboratory was responsible for proper QA/QC procedures. These procedures were either transmitted with the laboratory reports or on file at the laboratory.

10.0 LIMITATIONS

Environmental Technology Group, Inc. has prepared this Subsurface Investigation Report to the best of its ability. No other warranty, expressed or implied, is made or intended.

Environmental Technology Group, Inc. has examined and relied upon documents referenced in the report and has relied on oral statements made by certain individuals. Environmental Technology Group, Inc. has not conducted an independent examination of the facts contained in referenced materials and statements. We have presumed the genuineness of the documents and that the information provided in documents or statements is true and accurate. Environmental Technology Group, Inc. has prepared this report in a professional manner, using the degree of skill and care exercised by similar environmental consultants. Environmental Technology Group, Inc. also notes that the facts and conditions referenced in this report may change over time and the conclusions and recommendations set forth herein are applicable only to the facts and conditions as described at the time of this report.

This report has been prepared for the benefit of EOTT Energy Corp. The information contained in this report including all exhibits and attachments, may not be used by any other party without the express consent of Environmental Technology Group, Inc. and/or EOTT Energy Corp.

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Quality Control Review

By: Jason Henry
Jason Henry, Staff Environmental Scientist

TABLES

TABLE 1

SUMMARY OF SOIL CHEMISTRY
R.L. RODGERS LEAK SITE
LEA COUNTY, NM
ETGI PROJECT #EOT1041C

SAMPLE LOCATION	SAMPLE DATE	SAMPLE DEPTH (feet)	Methods: EPA SW 846-8021B, 5030					Methods: EPA SW 846-8015M GRO/DRO		
			BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL-BENZENE (mg/kg)	m,p-XYLENE (mg/kg)	o-XYLENE (mg/kg)	GRO C6-C10 (mg/kg)	DRO >C10-C25 (mg/kg)	
MW-1	02/07/00	20'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	<10	
MW-2	02/07/00	20'	<0.100	<0.100	<0.100	0.170	<0.100	<10	<10	
MW-3	02/07/00	15'	<0.100	<0.100	<0.100	0.107	<0.100	<10	<10	
SS01/East Wall 17' bgs	05/03/00	17'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	<10	
SS02/SE Corner 17' bgs	05/03/00	17'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	<10	
SS03/South Wall East 17' bgs	05/03/00	17'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	<10	
SS04/South Wall P/L 17' bgs	05/03/00	17'	<0.100	0.101	<0.100	0.108	<0.100	<10	290	
SS05/South Wall West 17' bgs	05/03/00	17'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	10	
SS06/West Wall 17' bgs	05/03/00	17'	<0.100	<0.100	<0.100	0.109	<0.100	<10	<10	
SS07/North Wall West 17' bgs	05/03/00	17'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	<10	
SS08/North Wall East 17' bgs	05/03/00	17'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	<10	

TABLE 2
GROUND WATER ELEVATION DATA
R.L. ROGERS SITE
LEA COUNTY, NM
ETGI PROJECT# EOT1041C

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUNDWATER ELEVATION
MW-1	02/22/00	3593.22	-	22.53	0.00	3570.69
	04/05/00			22.51	0.00	3570.71
MW-2	02/22/00	3591.20	-	21.55	0.00	3569.65
	04/05/00			21.55	0.00	3569.67
MW-3	02/22/00	3588.85	-	19.98	0.00	3568.87
	04/05/00			19.98	0.00	3568.93

TABLE 3

SUMMARY OF GROUND WATER CHEMISTRY
R. L. RODGERS LEAK SITE
LEA COUNTY, NM
ETGI PROJECT# EOT1041C

SAMPLE LOCATION	SAMPLE DATE	Methods: EPA SW 846-8021B, 5030					Methods: EPA 375.4, 325.3, 310, 160.1				
		BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL-BENZENE (mg/L)	m,p-XYLENE (mg/L)	o-XYLENE (mg/L)	SULFATE (mg/L)	CHLORIDE (mg/L)	CARBONATE (mg/L)	BICARBONATE (mg/L)	TDS (mg/L)
MW-1	02/23/00	<0.001	0.001	<0.001	<0.001	<0.001	206	170	0	220	759
	04/05/00	0.002	<0.001	0.002	0.009	0.005					
MW-2	02/23/00	<0.001	0.001	<0.001	<0.001	<0.001	186	163	0	330	756
	04/05/00	0.003	0.011	0.001	0.025	0.003					
MW-3	02/23/00	0.006	0.002	<0.001	0.002	0.002	230	195	0	335	975
	04/05/00	0.002	<0.001	<0.001	<0.001	<0.001					

TABLE 4

ADDITIONAL GROUND WATER CHEMISTRY

Semi-volatiles

R. L. RODGERS

LEA COUNTY, NM

ETGI PROJECT # EOT1041C

Analyte (mg/L)	MW-1 02/23/00	MW-2 02/23/00	MW-3 02/23/00	Reporting Limit
Naphthalene	ND	ND	ND	0.005
Acenaphthylene	ND	ND	ND	0.005
Acenaphthene	ND	ND	ND	0.005
Fluorene	ND	ND	ND	0.005
Phenanthrene	ND	ND	ND	0.005
Anthracene	ND	ND	ND	0.005
Fluoranthene	ND	ND	ND	0.005
Pyrene	ND	ND	ND	0.005
Benzo[a]anthracene	ND	ND	ND	0.005
Chrysene	ND	ND	ND	0.005
Benzo[b]fluoranthene	ND	ND	ND	0.005
Benzo[k]fluoranthene	ND	ND	ND	0.005
Benzo[a]pyrene	ND	ND	ND	0.005
Indeno[1,2,3-cd]pyrene	ND	ND	ND	0.005
Dibenz[a,h]anthracene	ND	ND	ND	0.005
Benzo[g,h,i]perylene	ND	ND	ND	0.005

ND = Below Reporting Limit

METHOD: EPA SW846-8270C, 3510

TABLE 4

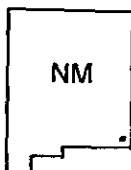
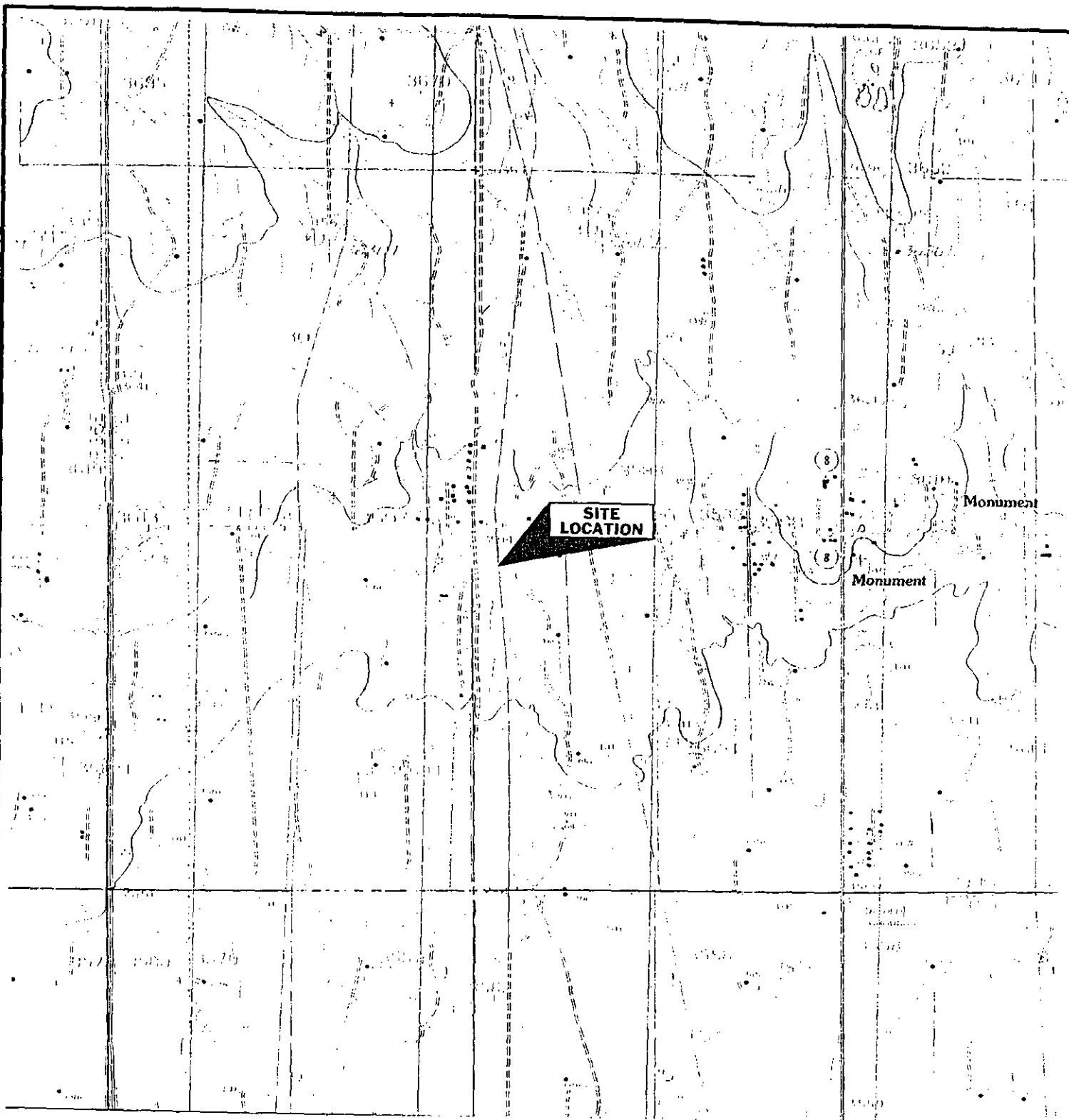
ADDITIONAL GROUND WATER CHEMISTRY
 Metals
 R. L. ROGERS LEAK SITE
 LEA COUNTY, NM
 ETGI PROJECT# EOT1041C

Analyte (mg/L)	MW-1 02/23/00	MW-2 02/23/00	MW-3 02/23/00	REPORTING LIMIT
Aluminum	0.2530	2.640	4.680	0.0500
Arsenic	ND	ND	0.0080	0.0500
Barium	0.1410	0.2440	0.1830	0.0100
Beryllium	ND	ND	ND	0.0040
Cadmium	ND	ND	ND	0.0010
Calcium	139.0	248.0	256.0	1.000
Chromium	ND	0.0080	0.0110	0.0050
Cobalt	ND	ND	ND	0.0200
Copper	ND	ND	ND	0.0100
Iron	0.2600	1.680	3.240	0.0500
Lead	ND	ND	ND	0.0030
Magnesium	23.90	24.50	34.50	1.000
Manganese	0.0490	0.0590	0.1120	0.0150
Mercury	ND	ND	ND	0.00020
Molybdenum	ND	ND	ND	0.050
Nickel	ND	ND	ND	0.0100
Potassium	6.310	6.920	7.340	1.000
Selenium	0.0050	ND	ND	0.0050
Silver	ND	ND	ND	0.00500
Sodium	91.70	117.0	176.0	1.000
Tin	ND	ND	ND	0.0500
Vanadium	ND	0.0270	0.0350	0.0200
Zinc	ND	0.0550	0.0700	0.0200
Boron	0.161	0.188	0.275	0.050
Strontium	1.33	1.29	1.70	0.050

ND = Below Reporting Limit

METHOD: EPA SW846-6010B, 7470

FIGURES



QUADRANGLE LOCATION
S32, T19S, R37E

MONUMENT SOUTH QUADRANGLE
NEW MEXICO
7.5 MINUTE SERIES (TOPOGRAPHIC)



scale: 1" = 2000'

FIGURE 1
SITE LOCATION MAP
EOTT ENERGY CORP.
R. L. RODGERS
LEA COUNTY, NM

PROJECT NO.

EOT 1041C

PREPARED BY:

R. STEVENS

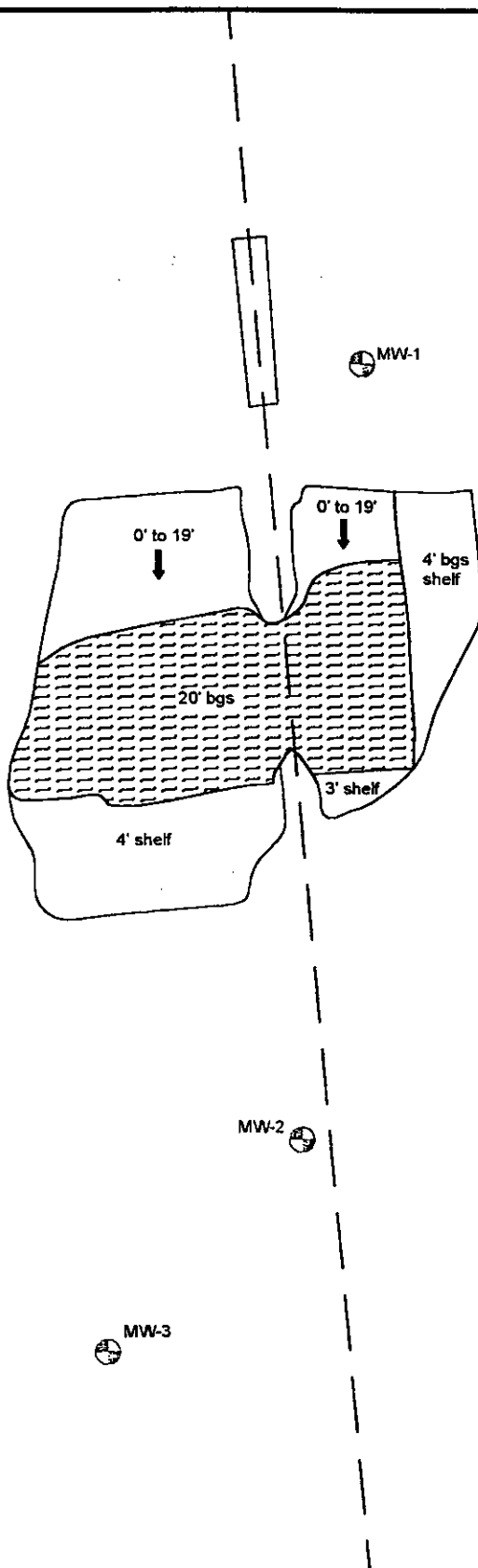
DATE

5-09-00





REVIEWED BY:

J. TAYLOR





LEGEND:

-  ETGI Monitoring Well Locations
-  EOTT Pipeline
-  Excavated Area
-  Groundwater

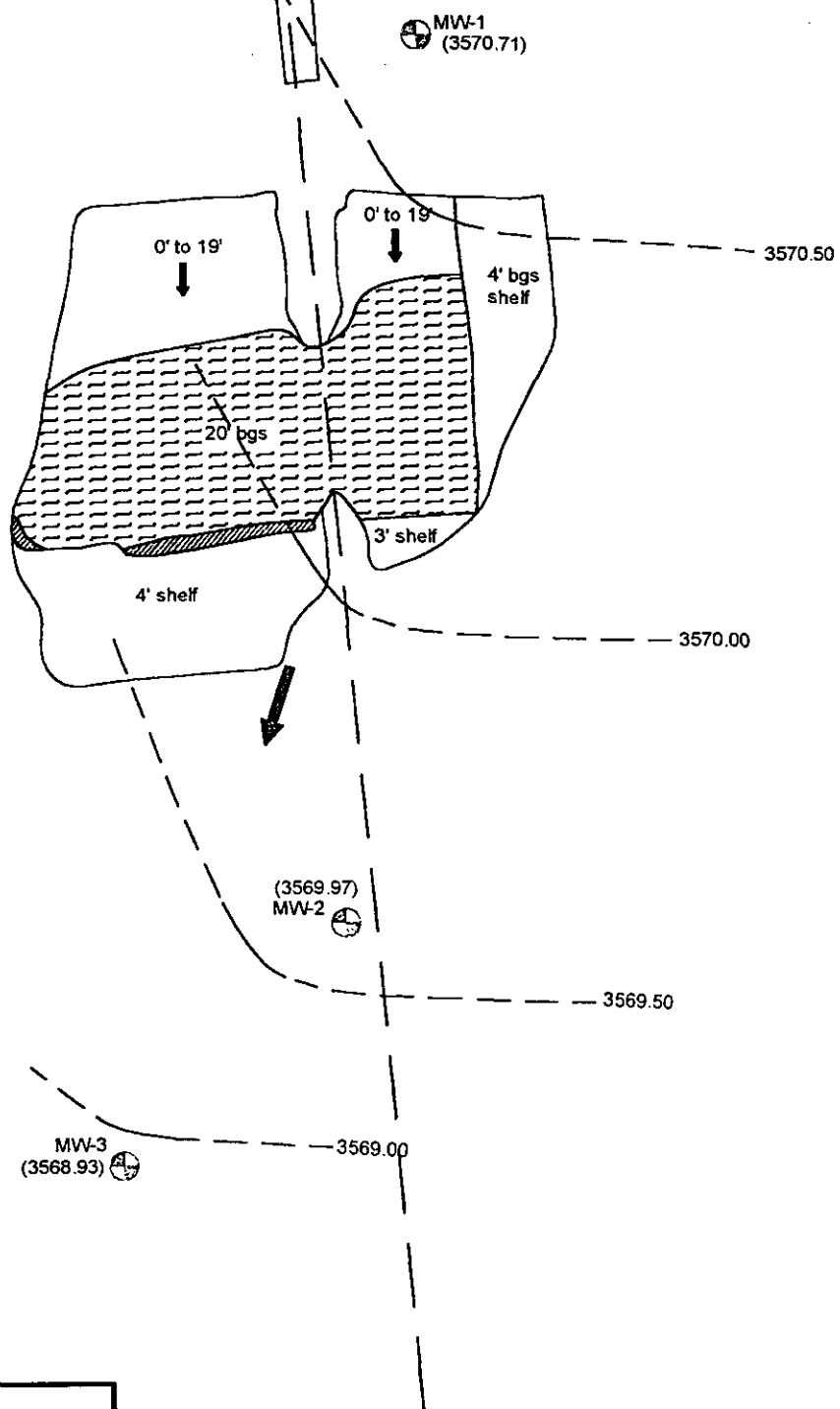
**Figure 2
Site Map**

**EOTT Energy Corp.
R. L. Rodgers
Lea County, NM**



**Environmental Technology
Group, INC.**

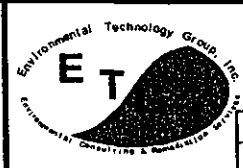
Scale: 1" = 65'	Prep By: RS	Checked By: JT
March 8, 2000	ETGI Project # EOT 1041C	



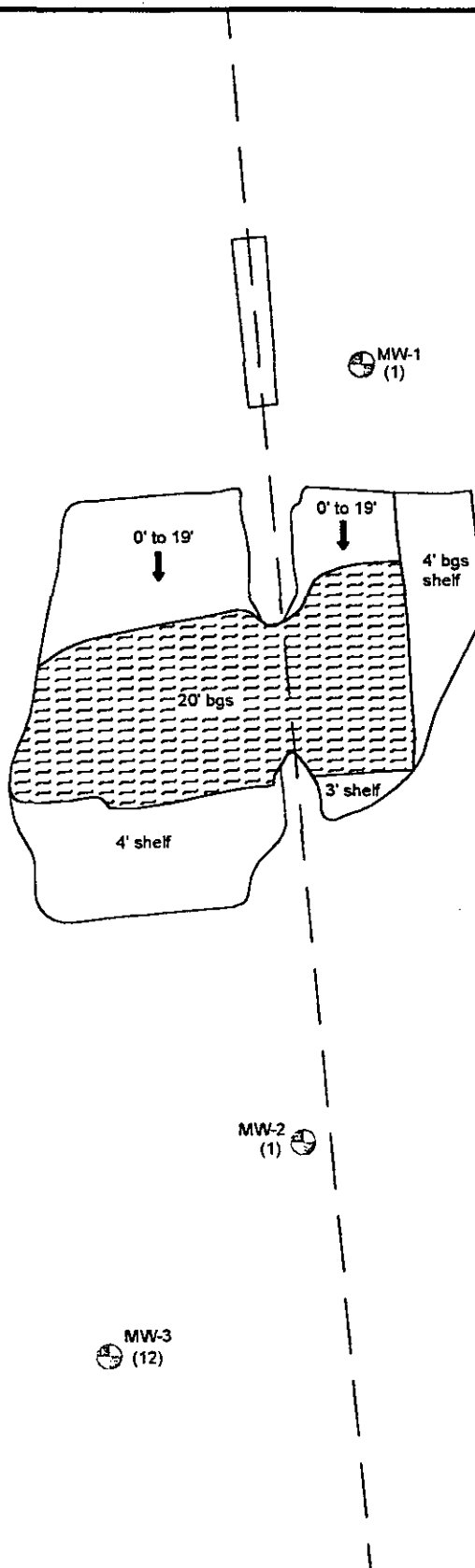
LEGEND:

	ETGI Monitoring Well Locations
	EOTT Pipeline
	Excavation Area
	Groundwater
	Ground Water Contour Lines
(3546.09)	Ground Water Elevations (in feet)

Figure 3
Inferred Ground Water
Gradient Map
EOTT Energy Corp.
R. L. Rodgers
Lea County, NM



Environmental Technology Group, INC.		
Scale: 1" = 60'	Prep By: RS	Checked By: MVS
May 4, 2000	ETGI Project # EOT 1041C	



LEGEND:





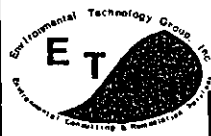
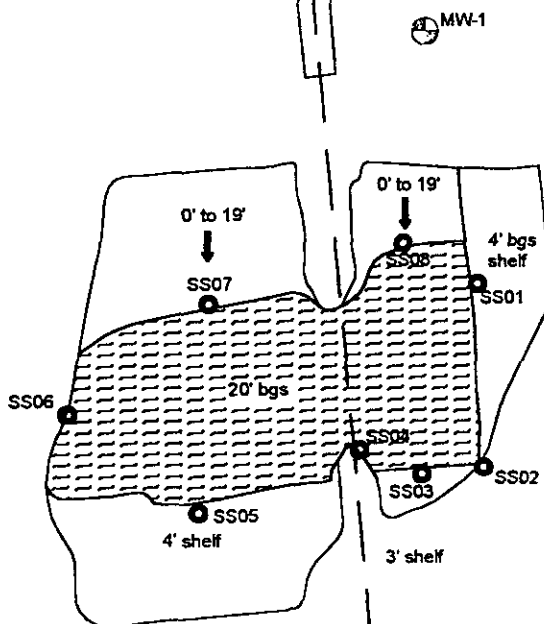
-  ETGI Monitoring Well Locations
-  EOTT Pipeline
-  Excavation Area
-  Groundwater
- (1) BTEX Concentration ($\mu\text{g/L}$)

Figure 4
Total BTEX in Ground
Water
EOTT Energy Corp.
R. L. Rodgers
Lea County, NM



Environmental Technology
Group, INC.

Scale: 1" = 85'	Prep By: RS	Checked By: JT
March 8, 2000	ETGI Project # EOT 1041C	



LEGEND:

- ⊕ ETGI Monitoring Well Locations
- Side Wall Sample
- EOTT Pipeline
- Excavated Area
- Groundwater

Figure 5
Soil Sample Location Map

EOTT Energy Corp.
R. L. Rodgers
Lea County, NM



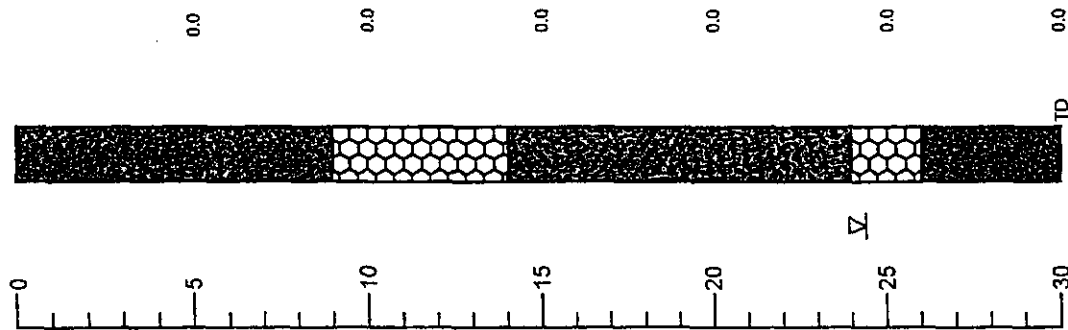
Environmental Technology
Group, INC.

Scale: 1" = 65'	Prep By: RS	Checked By: JT
March 8, 2000	ETGI Project # EOT 1041C	

APPENDIX A

Monitoring Well MW - 1

Depth (feet) Soil Columns PID Reading Notes



Monitoring Well Details

Date Drilled: 02-07-00
 Thickness of Bentonite Seal: 2 ft
 Length of PVC Well Screen: 20 ft
 Depth of PVC Well: 30 ft
 Depth of Exploratory Well: 30 ft
 Depth to Ground Water: 24.5 ft

Grout Surface Seal
 Bentonite Pellet Seal
 Sand Pack
 Screen

Legend

Sand - (SP) - Brown, Tan, very fine grained, well sorted, dry, no odor, no stain.

Clay - (ML) - Red, sandy, silty, soft, moist to wet

Caliche - White, hard, interbedded with sand.

Indicates samples selected for laboratory analysis.

Indicates the PSH level measured on date.

Indicates the ground water level measured on date.

PID Head-space reading in ppm obtained with a photo-ionization detector.

Completion Notes

1. The monitoring well was installed on date using air rotary drilling techniques.
2. The well was constructed with 2" ID, 0.010 inch factory slotted, threaded joint, schedule 40 PVC pipe.
3. The well is protected with a locked slick up steel cover and a compression cap.
4. The lines between material types shown on the profile log represent approximate boundaries. Actual transitions may be gradual.
5. The depths indicated are referenced from the ground surface.

Boring Log And Monitoring Well Details

Monitoring Well - 1

EOTT Energy Corp. R. L. Rodgers Lea County, NM

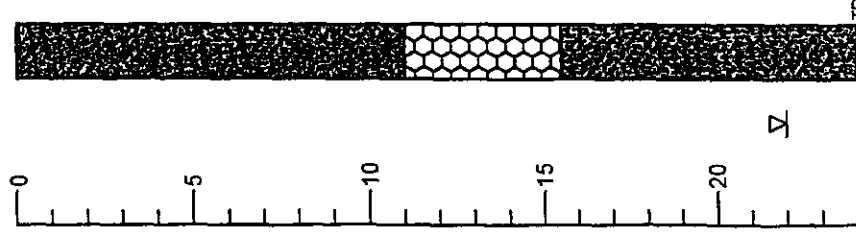


Environmental Technology Group, Inc.

Scale: use scale Prep By: RS Checked By: JT
 February 17, 2000 ETGI Project #EOT 1041C

Monitoring Well MW - 2

Depth (feet) Soil Columns PID Reading Notes



Monitoring Well Details

Date Drilled 02-07-00
 Thickness of Bentonite Seal 2 ft
 Length of PVC Well Screen 15 ft
 Depth of PVC Well 24 ft
 Depth of Exploratory Well 24 ft
 Depth to Ground Water 21.8 ft

Grout Surface Seal
 Bentonite Pellet Seal
 Sand Pack
 Screen

Legend

- Sand - (SP) - Brown, Tan, very fine grained, well sorted, dry, no odor, no stain.
- Clay - (ML) - Red, sandy, silty, soft, moist to wet
- Caliche - White, hard, interbedded with sand.
- Indicates samples selected for laboratory analysis.
- Indicates the PSH level measured on date.
- Indicates the ground water level measured on date.
- PID Head-space reading in ppm obtained with a photo-ionization detector.

Completion Notes

1. The monitoring well was installed on date using air rotary drilling techniques.
2. The well was constructed with 2" ID, 0.020 inch factory slotted, threaded joint, schedule 40 PVC pipe.
3. The well is protected with a locked slick up steel cover and a compression cap.
4. The lines between material types shown on the profile log represent approximate boundaries. Actual transitions may be gradual.
5. The depths indicated are referenced from the ground surface.

Boring Log And Monitoring Well Details

Monitoring Well - 2

EOTT Energy Corp. R. L. Rodgers Lea County, NM



Environmental Technology
 Group, Inc.

Scale, use scale Prep By: RS Checked By: JT
 February 17, 2000 ETGI Project #EOT 1041C

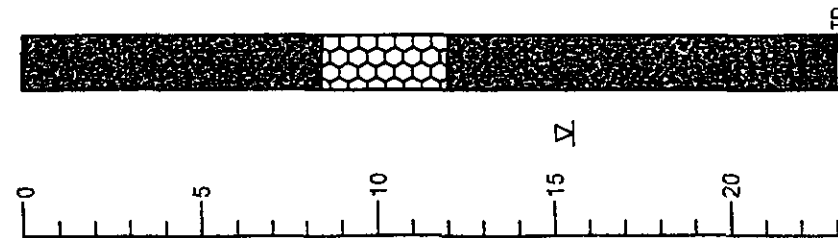
Monitoring Well MW - 3

Depth (feet) _____

Soil Columns _____

PID Reading _____

Notes _____



Monitoring Well Details

Date Drilled 02 - 07 - 00
 Thickness of Bentonite Seal 2 ft
 Length of PVC Well Screen 15 ft
 Depth of PVC Well 23 ft
 Depth of Exploratory Well 23 ft
 Depth to Ground Water 15.5 ft

Grout Surface Seal
 Bentonite Pellet Seal
 Sand Pack
 Screen

Legend

Sand - (SP) - Brown, Tan, very fine grained, well sorted, dry, no odor, no stain.

Clay - (ML) - Red, sandy, silty, soft, moist to wet

Caliche - White, hard, interbedded with sand.

Indicates samples selected for laboratory analysis.

Indicates the PSH level measured on date.

Indicates the ground water level measured on date.

PID Head-space reading in ppm obtained with a photo-ionization detector.

Completion Notes

1. The monitoring well was installed on date using air rotary drilling techniques.
2. The well was constructed with 2" ID, 0.020 inch factory slotted, threaded joint, schedule 40 PVC pipe.
3. The well is protected with a locked slick up steel cover and a compression cap.
4. The lines between material types shown on the profile log represent approximate boundaries. Actual transitions may be gradual.
5. The depths indicated are referenced from the ground surface.

Boring Log And Monitoring Well Details

Monitoring Well - 3

EOTT Energy Corp. R. L. Rodgers Lea County, NM



Environmental Technology Group, Inc.

Scale: use scale
 Prep By: RS
 Checked By: JT
 February 17, 2000
 ETGI Project #EOT 1041C

APPENDIX B

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

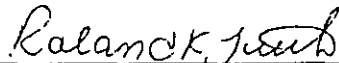
ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 505-392-3760

Sample Type: Soil
Sample Condition: Intact/Iced
Project #: EOT 1041C
Project Name: R.L. Rodgers
Project Location: Monument, N.M.

Sampling Date: 02/07/00
Receiving Date: 02/12/00
Analysis Date: 2/14 & 2/15/00

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
23532	MW-1 (20')	<0.100	<0.100	<0.100	<0.100	<0.100
23533	MW-2 (20')	<0.100	<0.100	<0.100	0.170	<0.100
23534	MW-3 (15')	<0.100	<0.100	<0.100	0.107	<0.100
	% IA	94	92	90	91	88
	% EA	102	98	96	98	95
	BLANK	<0.100	<0.100	<0.100	<0.100	<0.100

METHODS: SW 846-8021B,5030


Raland K. Tuttle

2-16-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 505-392-3760

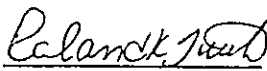
Sample Type: Soil
Sample Condition: Intact/Iced
Project #: EOT1041C
Project Name: R.L. Rodgers
Project Location: Monument, N.M.

Sampling Date: 02/07/00
Receiving Date: 02/12/00
Analysis Date: 02/14/00

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg
23532	MW-1 (20')	<10	<10
23533	MW-2 (20')	<10	<10
23534	MW-3 (15')	<10	<10

%INSTRUMENT ACCURACY	111	110
% EXTRACTION ACCURACY	112	113
BLANK	<10	<10

Methods: EPA SW 846-8015M GRO/DRO


Raland K. Tuttle

2-16-00
Date

ENVIRONMENTAL LAB OF ILLINOIS, 12000 West 120th East, (915) 563-1800 FAX (915) 563-1713

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

COE: 080

Project Manager:

Phone #: (915) 664-9166

FAX #: (505) 392-3760

JESSE TAYLOR

Company Name & Address:

ETG-I

P.O. Box 4895, MIDLAND TX 79704

Project #:

1041C

Project Name:

R.L.

~~RODGERS~~ RODGERS

Project Location:

MONUMENT NM

Samplet Signature:

Ken Dutton

LAS # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX										PRESERVATIVE METHOD		SAMPLING	
				AIR	SOIL	WATER	SLUDGE	OTHER	HCL	HFNO3	ICE	HOHE	OTHER	DATE	TIME	DATE	TIME

23532 HW-1 (20')

1 402

X

2-7-1130

X

23533 HW-2 (20')

1 402

X

2-7-1210

X

23534 HW-3 (15')

1 402

X

2-7-1310

X

UTEX 80205030

TPH 418.1

TCF Metals Ag As Ba Cd Cr Pb Hg Se

Total Metals Ag As Ba Cd Cr Pb Hg Se

TCF Volatiles

TCF Semi Volatiles

TDS

RCI

TPH 8015-20/6-80

Relinquished by:

Ken Dutton

Date:

11/4/00

Times:

1555

Received by:

Ken Dutton

Relinquished by:

Ken Dutton

Date:

02-12-00

Times:

1115

Received by:

Ken Dutton

Relinquished by:

Ken Dutton

Date:

02-12-00

Times:

1115

Received by:

Ken Dutton

REMARKS

F-R
K. DUTTON

INVOICE: L. FROST

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 505-392-3760

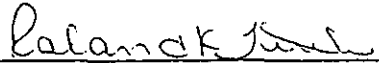
Sample Type: Water
Sample Condition: Intact/ Iced/HCl
Project #: EOT 1041C
Project Name: R.L. Rogers
Project Location: Monument, N.M.

Sampling Date: 02/23/00
Receiving Date: 02/24/00
Analysis Date: 02/24/00

ELT#	FIELD CODE	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYLBENZENE (mg/L)	m,p-XYLENE (mg/L)	o-XYLENE (mg/L)
23713	MW-1	<0.001	0.001	<0.001	<0.001	<0.001
23714	MW-2	<0.001	0.001	<0.001	<0.001	<0.001
23715	MW-3	0.006	0.002	<0.001	0.002	0.002

% IA	94	89	89	90	89
% EA	95	90	90	91	90
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: EPA SW 846-8021B,5030


Raland K. Tuttle

2-28-00
Date

ENVIRONMENTAL

LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 505-392-3760

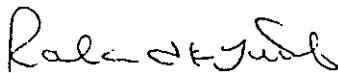
Sample Type: Water
Sample Condition: Intact/ Iced
Project #: EOT 1041C
Project Name: R.L. Rogers
Project Location: Monument, N.M.

Sampling Date: 02/23/00
Receiving Date: 02/24/00
Analysis Date: 02/24/00

ELT#	FIELD CODE	Sulfate mg/L	Chloride mg/L	Carbonate mg/L	Bicarbonate mg/L	TDS mg/L
23713	MW-1	206	170	0	220	759
23714	MW-2	186	163	0	330	756
23715	MW-3	230	195	0	335	975

QUALITY CONTROL	52.7	5318	*	*	*
TRUE VALUE	50.0	5000	*	*	*
% PRECISION	105	106	*	*	*

METHODS: EPA 375.4, 325.3, 310, 160.1


Raland K. Tuttle

2-28-00
Date

ENVIRONMENTAL

LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 505-392-3760

Sample Type: Water
Sample Condition: Intact/ Iced
Project #: EOT 1041C
Project Name: R.L. Rogers
Project Location: Monument, N.M.
Field Code: MW-1

Sampling Date: 02/23/00
Receiving Date: 02/24/00
Extraction Date: 02/25/00
Analysis Date: 02/25/00

EPA SW846 8270 (mg/l)	REPORT LIMIT	ELT# 23713	RPD	%EA	%IA
Naphthalene	0.005	ND			92
Acenaphthylene	0.005	ND			94
Acenaphthene	0.005	ND	2.90	68	94
Fluorene	0.005	ND			98
Phenanthrene	0.005	ND			102
Anthracene	0.005	ND			92
Fluoranthene	0.005	ND			94
Pyrene	0.005	ND	1.50	66	88
Benzo[a]anthracene	0.005	ND			92
Chrysene	0.005	ND			92
Benzo[b]fluoranthene	0.005	ND			94
Benzo[k]fluoranthene	0.005	ND			100
Benzo[a]pyrene	0.005	ND			100
Indeno[1,2,3-cd]pyrene	0.005	ND			84
Dibenz[a,h]anthracene	0.005	ND			104
Benzo[g,h,i]perylene	0.005	ND			100

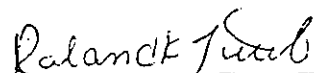
% RECOVERY

Nitrobenzene-d5 SURR
2-Fluorobiphenyl SURR
Terphenyl-d14 SURR

76
86
81

ND= NOT DETECTED

Method: EPA SW 846 8270C , 3510


Raland K. Tuttle

2-29-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 505-392-3760

Sample Type: Water
Sample Condition: Intact/ Iced
Project #: EOT 1041C
Project Name: R.L. Rogers
Project Location: Monument, N.M.
Field Code: MW-2

Sampling Date: 02/23/00
Receiving Date: 02/24/00
Extraction Date: 02/25/00
Analysis Date: 02/25/00

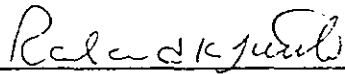
EPA SW846 8270 (mg/l)	REPORT LIMIT	ELT# 23714	RPD	%EA	%IA
Naphthalene	0.005	ND			92
Acenaphthylene	0.005	ND			94
Acenaphthene	0.005	ND	2.90	68	94
Fluorene	0.005	ND			98
Phenanthrene	0.005	ND			102
Anthracene	0.005	ND			92
Fluoranthene	0.005	ND			94
Pyrene	0.005	ND	1.50	66	88
Benzo[a]anthracene	0.005	ND			92
Chrysene	0.005	ND			92
Benzo[b]fluoranthene	0.005	ND			94
Benzo[k]fluoranthene	0.005	ND			100
Benzo[a]pyrene	0.005	ND			100
Indeno[1,2,3-cd]pyrene	0.005	ND			84
Dibenz[a,h]anthracene	0.005	ND			104
Benzo[g,h,i]perylene	0.005	ND			100

% RECOVERY

Nitrobenzene-d5 SURR 78
2-Fluorobiphenyl SURR 84
Terphenyl-d14 SURR 91

ND= NOT DETECTED

Method: EPA SW 846 8270C, 3510


Raland K. Tuttle

2-29-00
Date

ENVIRONMENTAL

LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 505-392-3760

Sample Type: Water
Sample Condition: Intact/ Iced
Project #: EOT 1041C
Project Name: R.L. Rogers
Project Location: Monument, N.M.
Field Code: MW-3

Sampling Date: 02/23/00
Receiving Date: 02/24/00
Extraction Date: 02/25/00
Analysis Date: 02/25/00

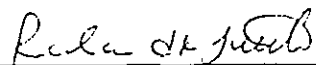
EPA SW846 8270 (mg/l)	REPORT LIMIT	ELT# 23715	RPD	%EA	%IA
Naphthalene	0.005	ND			92
Acenaphthylene	0.005	ND			94
Acenaphthene	0.005	ND	2.90	68	94
Fluorene	0.005	ND			98
Phenanthrene	0.005	ND			102
Anthracene	0.005	ND			92
Fluoranthene	0.005	ND			94
Pyrene	0.005	ND	1.50	66	88
Benzo[a]anthracene	0.005	ND			92
Chrysene	0.005	ND			92
Benzo[b]fluoranthene	0.005	ND			94
Benzo[k]fluoranthene	0.005	ND			100
Benzo[a]pyrene	0.005	ND			100
Indeno[1,2,3-cd]pyrene	0.005	ND			84
Dibenz[a,h]anthracene	0.005	ND			104
Benzo[g,h,i]perylene	0.005	ND			100

% RECOVERY

Nitrobenzene-d5 SURR	76
2-Fluorobiphenyl SURR	82
Terphenyl-d14 SURR	84

ND= NOT DETECTED

Method: EPA SW 846 8270C . 3510


Raland K. Tuttle

2-29-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 505-392-3760

Sample Type: Water
Sample Condition: Intact/Iced/HNO3
Project #: EOT 1041C
Project Name: R.L. Rogers
Project Location: Monument, N.M.

Sample Date: 02/23/00
Receiving Date: 02/24/00
Analysis Date: 02/26/00

Analyte (mg/L)	MW-1 23713	MW-2 23714	MW-3 23715	Reporting Limit	%IA	%EA	BLANK	RPD
Aluminum	0.2530	2.640	4.680	0.0500	104	111	<0.0500	1.22
Arsenic	ND	ND	0.0080	0.0500	104	110	<0.0050	3.70
Barium	0.1410	0.2440	0.1830	0.0100	102	101	<0.0100	2.82
Beryllium	ND	ND	ND	0.0040	96	96	<0.0040	2.11
Cadmium	ND	ND	ND	0.0010	94	94	<0.0010	2.15
Calcium	139.0	248.0	256.0	1.000	96	*	<1.000	0.69
Chromium	ND	0.0080	0.0110	0.0050	94	92	<0.0050	2.19
Cobalt	ND	ND	ND	0.0200	95	94	<0.0200	2.60
Copper	ND	ND	ND	0.0100	93	97	<0.0100	3.36
Iron	0.2600	1.680	3.240	0.0500	99	98	<0.0500	0.81
Lead	ND	ND	ND	0.0030	94	94	<0.0030	2.15
Magnesium	23.90	24.50	34.50	1.000	99	*	<1.000	0.41
Manganese	0.0490	0.0590	0.1120	0.0150	94	93	<0.0150	2.56
Mercury	ND	ND	ND	0.00020	95	106	<0.00020	0.94
Molybdenum	ND	ND	ND	0.050	94	96	<0.050	2.32
Nickel	ND	ND	ND	0.0100	95	92	<0.0100	2.63
Potassium	6.310	6.920	7.340	1.000	85	*	<1.000	0.77
Selenium	0.0050	ND	ND	0.0050	108	108	<0.0050	1.71
Silver	ND	ND	ND	0.00500	94	92	<0.0050	0.00
Sodium	91.70	117.0	176.0	1.000	112	*	<1.000	0.42
Tin	ND	ND	ND	0.0500	104	103	<0.0500	1.96
Vanadium	ND	0.0270	0.0350	0.0200	94	96	<0.0200	2.52
Zinc	ND	0.0550	0.0700	0.0200	97	99	<0.0200	3.29
Boron	0.161	0.188	0.275	0.050	103	107	<0.050	1.64
Strontium	1.33	1.29	1.70	0.050	97	91	<0.050	2.26

ND = Below Reporting Limit

METHOD: EPA SW846-6010B, 7470


Raland K. Tuttle

2-29-00
Date

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

203

Company Name & Address: *6704
P.O. BOX 41845
MINNEAPOLIS, MN 55441*

Project Name: *R. L. Rogers*

Sampler Signature: 

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX						PRESERVATIVE METHOD							SAMPLING	
				WATER	SOIL	AIR	SUDGE	OTHER	HCL	HNO3	ICE	NONE	OTHER	DATE	TIME			
23713	MW-1	5	1 L's	X						X	X	X			6/23	1425		
23714	MW-2	5													-	1358		
23715	MW-3	5		1						X	X	X	X		V	1323		

✓	X	OTEX 50275/13
✓	X	TPH 418.1
		TCLP Metals Ag A
		Total Metals Ag As
		TCLP Volatiles
		TCLP Semi Volatiles
		TDS 160.1
		NCI
✓	X	PAN 8100
✓	X	Heblyptis/mis
✓	X	MARTINS 6011
✓	X	MARTINS 300

Relinquished by:	Date:	Time:	Received by:	REMARKS
Amador Casas	2/24/00	0800	[Signature]	Mail Carrier: K. Davis and
[Signature]	24 Feb 00	0935	[Signature]	<u>RUSH</u> INVOICE: Lerman Frost 1015m
Relinquished by:	Date:	Time:	Received by:	

Environmental Lab of Texas, Inc. 11600 West 11th East Odessa, Texas 79753
 (915) 563-1800 FAX (915) 563-1713

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

DOC # 119

Project Manager: Jose Toranzo

Phone # (915) 664-9464
 FAX # (915) 392-3760

ANALYSIS REQUEST

Company Name & Address: ESTATE

1600 W 11th St MIDLAND TX 79704

Project #: LOT 1041 C

Project Name: R.L. Rodgers

Project Location: MANAGEMENT, MM

Supplier Signature: [Signature]

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	MATRIX				PRESERVATIVE METHOD				DATE	SAMPLING TIME
			WATER	SOIL	AIR	SLUDGE	OTHER	HCL	HNO3	ICE	OTHER	
24647	MW1	2	✓	✓				✓	✓	✓	4-5	1335
24648	MW2	1	✓	✓				✓	✓	✓	1300	1300
24649	MW3	1	✓	✓				✓	✓	✓	1300	1300

TFH 418.1
 BTEX 8112/15/100

TCLP Metals Ag As Ba Cd Cr Pb Hg Se
 Total Metals Ag As Ba Cd Cr Pb Hg Se
 TCLP Semi Volatiles
 TOS
 RCI

Relinquished by: <u>[Signature]</u>	Date: <u>4-6-00</u>	Time: <u>1200</u>	Received by:
Relinquished by:	Date:	Time:	Received by:
Relinquished by:	Date:	Time: <u>16:00</u>	Received by Laboratory: <u>[Signature]</u>

REMARKS

MANU RESULTS: H. DUTTON

EOT

WINDY; SEVERAL FEET 1015m

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 915-620-4310

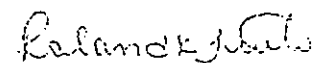
Sample Type: Soil
Sample Condition: Intact/ Iced 1 deg C.
Project #: EOT 1041C
Project Name: R.L. Rodgers
Project Location: Monument, N.M.

Sampling Date: 05/03/00
Receiving Date: 05/03/00
Analysis Date: 05/04/00

ELTH	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
25488	SS01/East Wall-17 bgs	<0.100	<0.100	<0.100	<0.100	<0.100
25489	SS02/SE Corner-17bgs	<0.100	<0.100	<0.100	<0.100	<0.100
25490	SS02/South Wall East-17bgs	<0.100	<0.100	<0.100	<0.100	<0.100
25491	SS04/South Wall P/L-17bgs	<0.100	0.101	<0.100	0.103	<0.100
25492	SS05/South Wall West-17bgs	<0.100	<0.100	<0.100	<0.100	<0.100
25493	SS06/West Wall-17bgs	<0.100	<0.100	<0.100	0.109	<0.100
25494	SS07/North Wall West-17bgs	<0.100	<0.100	<0.100	<0.100	<0.100
25495	SS08/North Wall East-17bgs	<0.100	<0.100	<0.100	<0.100	<0.100

% LA	103	102	103	112	101
% EA	101	95	101	111	101
BLANK	<0.100	<0.100	<0.100	<0.100	<0.100

METHODS: SW 846-80213,5030


Roland K. Tuttle

5-5-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

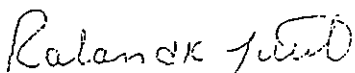
ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 915-520-4310

SampleType: Soil
Sample Condition: Intact/ Iced 1deg C.
Project #: EOT 1041C
Project Name: R.L. Rodgers
Project Location: Monument, N.M.

Sampling Date: 05/03/00
Receiving Date: 05/03/00
Analysis Date: 05/04/00

ELT#	FIELD CODE	GRO	DRO
		C6-C10 mg/kg	>C10-C28 mg/kg
25488	SS01/East Wall-17 bgs	<10	<10
25489	SS02/SE Corner-17bgs	<10	<10
25490	SS03/South Wall East-17bgs	<10	<10
25491	SS04/South Wall P/L-17bgs	<10	230
25492	SS05/South Wall West-17bgs	<10	10
25493	SS06/West Wall-17bgs	<10	<10
25494	SS07/North Wall West-17bgs	<10	<10
25495	SS08/North Wall East-17bgs	<10	<10
% IA		100	119
% EA		93	108
BLANK		<10	<10

METHODS: ISW 846-8015M GRO/DRO


Raland K. Tullie

5-5-00
Date

Environmental Lab of Texas, Inc. 12600 West 120 East Odessa, Texas 79761 (915) 563-1000 FAX (915) 563-1713

Project Manager: Jesse Tarver

Phone #: (915) 664-9111

FAX #: (915) 352-3710

Company Name & Address: ETL

P.O. Box 4845 MIDLAND TX 79704

Project #:

EOT 1041C

Project Name:

P.L. Rodgers

Project Location:

Monument NW

Sampler Signature:

[Signature]

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS			MATRIX			PRESERVATIVE METHOD				SAMPLING	
		Volume/Amount	WATER	SOIL	AIR	SLUDGE	OTHER	HCL	HNO3	NONE	OTHER	DATE	TIME
254108	5501/EASTWELL - 17' bgs	1	X						X			5-3-87	1630
254109	5502/SC CORNER - 17' bgs											5-3-87	1630
254110	5503/SOUTH WALL EAST - 17' bgs											5-3-87	1630
254111	5504/SOUTH WALL WEST - 17' bgs											5-3-87	1630
254112	5505/SOUTH WALL WEST - 17' bgs											5-3-87	1630
254113	5506/WEST WALL - 17' bgs											5-3-87	1630
254114	5507/WEST WALL WEST - 17' bgs											5-3-87	1630
254115	5508/SOUTH WALL EAST - 17' bgs											5-3-87	1630

Relinquished by: <u>[Signature]</u>	Date: <u>5/3/80</u>	Time: <u>1430</u>	Received by: <u>[Signature]</u>
Relinquished by: <u>[Signature]</u>	Date: <u>5-3-80</u>	Time: <u>1730</u>	Received by Laboratory: <u>[Signature]</u>
Relinquished by:	Date:	Time:	Received by Laboratory:

REMARKS

APRIL 1980 W. DUTTON
1980
1015 hr

ANALYSIS REQUEST

TPH	8615 DEO/680
TCMP Metals Ag As Ba Cd Cr Pb Hg Se	
Total Metals Ag As Ba Cd Cr Pb Hg Se	
TCMP Volatiles	
TCMP Semi Volatiles	
TDS	
FCI	

CHAIN-OF-CUSTODY RECORD

COC 131

0 (R) 11/5

ANNUAL MONITORING REPORT

**EOTT PIPELINE COMPANY
R. L. RODGERS
LEA COUNTY, NEW MEXICO**

1R-87

RECEIVED

MAY 09 2001

**ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION**

PREPARED FOR:

**EOTT PIPELINE COMPANY
5805 EAST HIGHWAY 80
MIDLAND, TEXAS 79701**

PREPARED BY:

**ENVIRONMENTAL TECHNOLOGY GROUP, INC.
2540 WEST MARLAND
HOBBS, NEW MEXICO 88240**

April 2001

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LABORATORY RESULTS

SUMMARY

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Table 2 – Ground Water Chemistry

APPENDICES

Appendix A – Laboratory Reports

INTRODUCTION

Environmental Technology Group, Inc. (ETGI), on behalf of EOTT Energy Corp. (EOTT), prepared this annual report in compliance with the New Mexico Oil Conservation Division (OCD) letter of May 1998, requiring submittal of an annual report by April 1 of each year. The report presents the results of the quarterly ground water monitoring events only. For reference, the Site Location Map is provided as Figure 1.

Ground water monitoring was conducted during four quarterly events in calendar year 2000 to assess the levels and extent of dissolved phase constituents. The ground water monitoring events consisted of measuring static water levels in the monitoring wells, and purging and sampling of each well exhibiting sufficient recharge.

FIELD ACTIVITIES

The site monitoring wells were gauged and sampled on February 23, May 3, August 29, and November 28, 2000. During each sampling event, the monitoring wells, designated to be sampled, were purged of approximately 3 well volumes of water or until the wells were dry using a PVC bailer or electrical Grundfos Pump. Ground water was allowed to recharge and samples were obtained using disposable Teflon samplers. Water samples were stored in clean, glass containers provided by the laboratory and placed on ice in the field. Purge water was collected in a polystyrene tank and disposed of by Pate Trucking, Hobbs, New Mexico, utilizing a licensed disposal facility (OCD AO SWD-730).

GROUND WATER GRADIENT

Locations of the monitoring wells and the inferred ground water gradient, as measured on November 28, 2000, are depicted on Figure 2, the Site Ground Water Gradient Map. The ground water elevation data are provided as Table 1. Ground water elevation contours, generated from the final quarterly event of calendar year 2000 water level measurements, indicated a general gradient of approximately 0.005 ft/ft to the southwest as measured between ground water monitoring wells MW-1 and MW-3. The depth to ground water, as measured from the top of the well casing, ranged between 19.86 to 22.52 feet for the shallow alluvial aquifer.

LABORATORY RESULTS

Ground water samples collected during the quarterly sampling events were hand delivered to Environmental Laboratory of Texas, Midland, Texas for determination of benzene, toluene, ethyl benzene and total xylenes (BTEX) concentrations by EPA Method SW846-8021B. The ground water chemistry data are provided as Table 2 and the Laboratory Reports are provided as Appendix A.

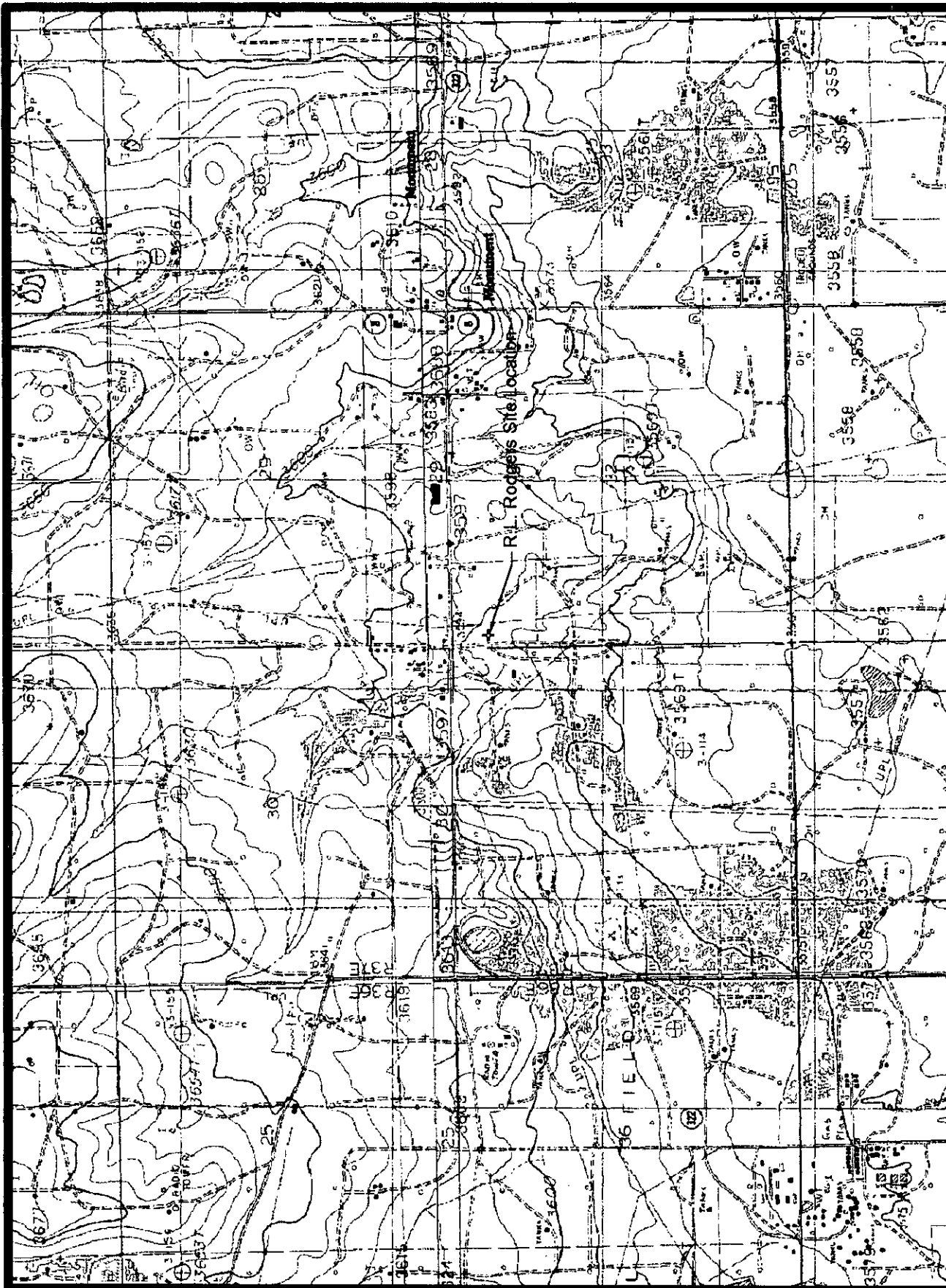
Laboratory results for all of the site ground water samples, obtained during the calendar year 2000 monitoring period, indicated that Benzene and BTEX concentrations were below regulatory standards for all of the on-site monitoring wells.

SUMMARY

This report presents the results of monitoring activities for the annual monitoring period of calendar year 2000. Ground water elevation contours, generated from the final quarterly event of calendar year 2000 water level measurements, indicated a general gradient of approximately 0.005 ft/ft to the southwest as measured between ground water monitoring wells MW-1 and MW-3.

Laboratory results for all of the site ground water samples, obtained during the calendar year 2000 monitoring period, indicated that Benzene and BTEX concentrations were below regulatory standards for all of the on-site monitoring wells. Therefore, a site closure request will be submitted to the OCD in the near future.

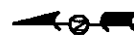
FIGURES



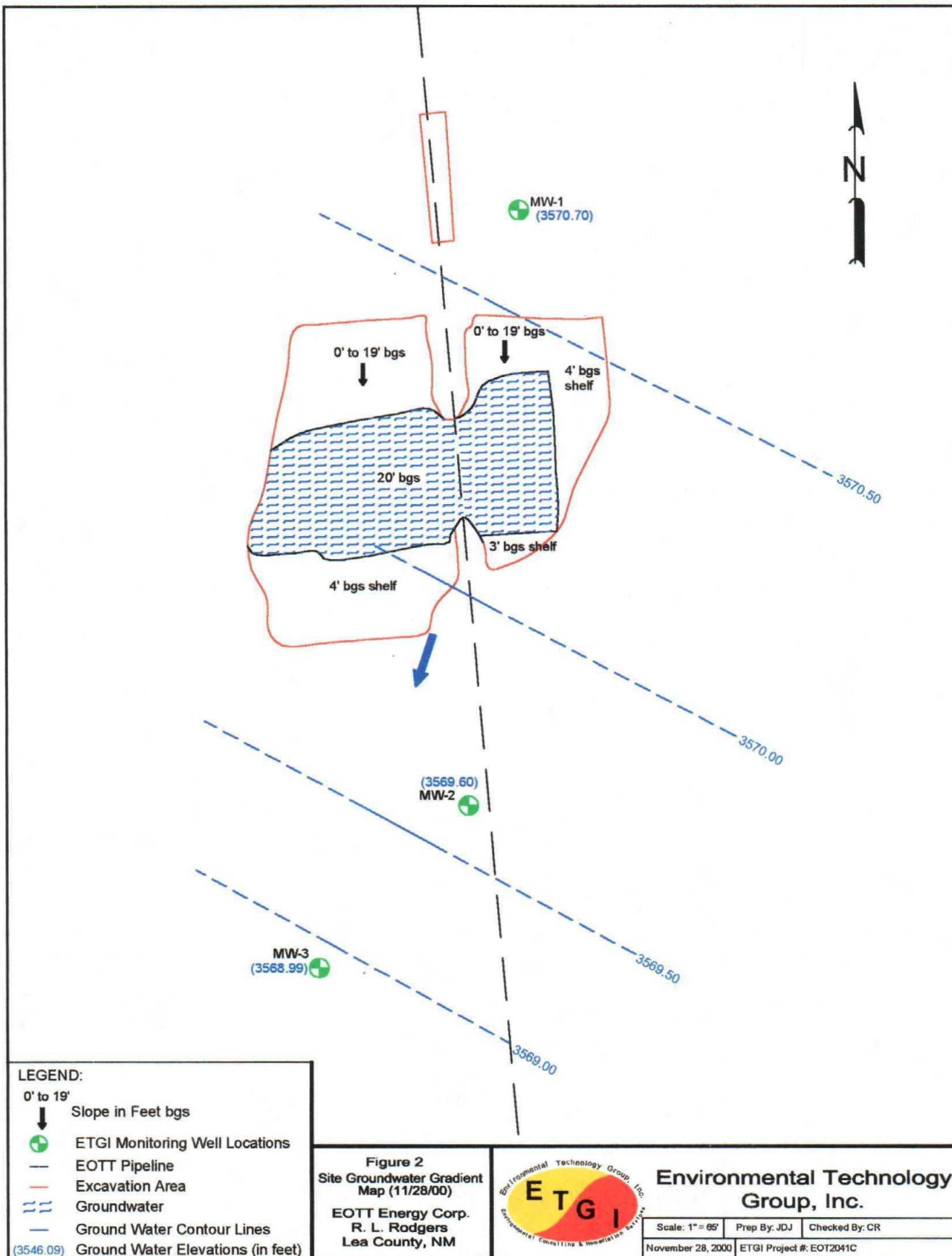
Environmental Technology
Group, Inc.

Figure 1
Site Locations Map

EOTT Energy Corp.
R.L. Rodgers
Lea County, NM



Scale: NTS
November 28, 2000
Prep By: DJ
Checked By: CR
ETGI Project #: EOT2041C



TABLES

TABLE 1**GROUND WATER ELEVATION
ANNUAL REPORT****EOTT ENERGY CORPORATION
R. L. ROGERS
LEA COUNTY, NEW MEXICO
ETGI PROJECT # EOT 2041C**

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
MW - 1	02/23/00	3,593.22	-	22.51	0.00	3,570.71
	05/03/00	3,593.22	-	20.03	0.00	3,573.19
	08/29/00	3,593.22	-	22.52	0.00	3,570.70
	11/28/00	3,593.22	-	22.52	0.00	3,570.70
MW - 2	02/23/00	3,591.20	-	21.55	0.00	3,569.65
	05/03/00	3,591.20	-	20.03	0.00	3,571.17
	08/29/00	3,591.20	-	21.57	0.00	3,569.63
	11/28/00	3,591.20	-	21.60	0.00	3,569.60
MW - 3	02/23/00	3,588.85	-	19.98	0.00	3,568.87
	05/03/00	3,588.85	-	21.56	0.00	3,567.29
	08/29/00	3,588.85	-	19.88	0.00	3,568.97
	11/28/00	3,588.85	-	19.86	0.00	3,568.99

TABLE 2

**GROUND WATER CHEMISTRY
ANNUAL REPORT**

EOTT ENERGY CORPORATION

R.L. ROGERS

LEA COUNTY, NEW MEXICO

ETGI PROJECT # EOT 2041C

All concentrations are in mg/L

SAMPLE LOCATION	SAMPLE DATE	SW 846-8021B, 5030				
		BENZENE	TOLUENE	ETHYL- BENZENE	M,P- XYLENES	O- XYLENES
MW - 1	02/23/00	<0.001	0.001	<0.001	<0.001	<0.001
	04/05/00	0.002	<0.001	0.002	0.009	0.005
	08/29/00	<0.001	<0.001	<0.001	<0.001	<0.001
	11/28/00	<0.001	<0.001	<0.001	<0.001	<0.001
MW - 2	02/23/00	<0.001	0.001	<0.001	<0.001	<0.001
	04/05/00	0.003	0.011	0.001	0.025	0.003
	08/29/00	<0.001	<0.001	<0.001	<0.001	<0.001
	11/28/00	<0.001	<0.001	<0.001	<0.001	<0.001
MW - 3	02/23/00	0.006	0.002	<0.001	0.002	0.002
	04/05/00	0.002	<0.001	<0.001	<0.001	<0.001
	08/29/00	<0.001	<0.001	<0.001	<0.001	<0.001
	11/28/00	<0.001	<0.001	<0.001	<0.001	<0.001

APPENDIX

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 505-392-3760

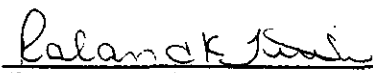
Sample Type: Water
Sample Condition: Intact/ Iced/HCl
Project #: EOT 1041C
Project Name: R.L. Rogers
Project Location: Monument, N.M.

Sampling Date: 02/23/00
Receiving Date: 02/24/00
Analysis Date: 02/24/00

ELT#	FIELD CODE	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYLBENZENE (mg/L)	m,p-XYLENE (mg/L)	o-XYLENE (mg/L)
23713	MW-1	<0.001	0.001	<0.001	<0.001	<0.001
23714	MW-2	<0.001	0.001	<0.001	<0.001	<0.001
23715	MW-3	0.006	0.002	<0.001	0.002	0.002

% IA	94	89	89	90	89
% EA	95	90	90	91	90
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: EPA SW 846-8021B,5030


Raland K. Tuttle

2-28-00
Date

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

2008

Phone #: (915) 664-4162
FAX #: (915) 392-3260

Project Name: *R. L. Rogers*

Sampler Slips:

For Dear

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX				PRESERVATIVE METHOD				SAMPLING		TPH 418.1	TCLP Metals Ag As B	Total Metals Ag As B	TCLP Volatiles	TCLP Semi Volatiles	TDS 160.1	RCI	PAH 8100 a	Heavy Metals	DATA'S 6010	MW/WS 300		
				WATER	SOIL	AIR	SLUDGE	OTHER	HCL	HNO3	ICE	NONE	OTHER												DATE	TIME
23713	MW 1	5	1.5	X						X	X	X		2/23	1425	X						X				
23714	MW 2	5	1											2/23	1351							X				
23715	MW 3	5	1												1323							X				

REMARKS

Don Carter

Received by:

James McMur

MARKS
MAIL LETTER: K. DUTTON
RUSH
INVOICE: LEMMAN FROM 1015m

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 915-520-4310
FAX: 505-392-3760


SampleType: Water
Sample Condition: Intact/ Iced/HCl
Project #: EOT 1041C
Project Name: R.L. Rogers
Project Location: Monument, N.M.

Sampling Date: 04/05/00
Receiving Date: 04/06/00
Analysis Date: 4/10/00

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
24647	MW-1	0.002	<0.001	0.002	0.009	0.005
24648	MW-2	0.003	0.011	0.001	0.025	0.003
24649	MW-3	0.002	<0.001	<0.001	<0.001	<0.001

% IA	91	90	92	95	88
% EA	94	92	94	97	90
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8021B,5030


Raland K. Tuttle

4-12-00
Date

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Doc # 119

Phone #: (915) 664-9161
FAX #: (915) 392-3260

L.O. Box 4845 MIDLAND TX 79704

Project Name:

FOI 10410

R. L. Rodgers

Project Location:

Sampler Signature:

DOCUMENT, W. M.

Amor (cast)

TPH	418.1
TCLP Metals Ag As	
Total Metals Ag As	
TCLP Volatiles	
TCLP Semi Volatiles	
TDS	
RCI	

Received by

Relinquished by: *Harmon Case*

Date: 4-1-00

Times: 1200

Received by

Received by

by: 2949

Date:

Times:

Received by

Received by T. J. H. H. H.

disseminated by:

Date: _____

Time: _____

Received by

REMARKS

REMARKS
MALE RESULTS: K. DUTTON

— INVOICE; LENNAH FROST 10x5m

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: BETH ALDRICH
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 915-520-4310

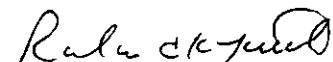
SampleType: Water
Sample Condition: Intact/ Iced/ HCl/ 27 deg. F
Project #: EOT 2041C
Project Name: R.L. Rogers
Project Location: Monument, N.M.

Sampling Date: 08/29/00
Receiving Date: 08/30/00
Analysis Date: 09/05/00

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L	TOTAL BTEX mg/L
30255	MW 1	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
30256	MW 2	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
30257	MW 3	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

% IA	103	100	103	106	99
% EA	104	104	106	110	102
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8021B,5030


Raland K. Tuttle

9-6-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.

ATTN: BETH ALDRICH

P.O. BOX 4845

MIDLAND, TEXAS 79704

FAX: 915-520-4310

FAX: 505-397-4701

Sample Type: Water

Sample Condition: Intact/ Iced/ HCl/ 0.5 deg. C

Project #: EOT 2041C

Project Name: R.L. Rogers

Project Location: Monument, N.M.

Sampling Date: 11/28/00

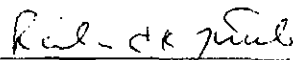
Receiving Date: 12/02/00

Analysis Date: 12/03/00

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
34584	MW 1	<0.001	<0.001	<0.001	<0.001	<0.001
34585	MW 2	<0.001	<0.001	<0.001	<0.001	<0.001
34586	MW 3	<0.001	<0.001	<0.001	<0.001	<0.001
34587	EB 1	<0.001	<0.001	<0.001	<0.001	<0.001

%IA	95	102	100	103	98
%EA	96	102	100	104	98
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: EPA SW 846-8021B, 5030


Roland K. Tuttle

12-4-00
Date

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ANALYSIS REQUEST (Circle or Specify Method No.)

For Use On **EOTT ENERGY CORP.** Projects Only

EOTT ENERGY CORP.
5805 East Business 20
Midland, TX 79702
Tel (915) 687-3400
Fax (915) 582-2781

4600 West Wall
Midland, TX 79703
Tel (915) 522-1139
Fax (915) 520-4310

2540 West Marland
Hobbs, NM 88242
Tel (505) 397-4882
Fax (505) 397-4701

Project Manager: BETH ANDRICH		Project Number: EOT 2841 C	
Project Name: R. L. ROGERS		Sampler Signature: <i>[Signature]</i>	
Project Location: Midland NM			

LAB # (Lab Use Only)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX				PRESERVATION METHOD				SAMPLING		
				WATER	SOIL	AIR	SLUDGE	HCL	HNO ₃	NaHSO ₄	ICE	NONE	DATE	TIME
	MW 1	2	✓	✓				✓					11/28	1435
	MW 2	1	✓	✓				✓					1452	1
	MW 3	1	✓	✓				✓					1508	
	EB 1	1	✓	✓				✓					1520	✓

TPH 8015M GRO/DRO	PAH 8270C (8100 New Mexico only)	Total Metals Ag As Ba Cd Cr Pb Se Hg 6010B/470	TCLP Metals Ag As Ba Cd Cr Pb Se Hg	TCLP Volatiles	TCLP Semi Volatiles	Volatiles 8260B	Semi Volatiles 8270C	TDS 160.1	Cations/Anions 375.4/325.3
-------------------	----------------------------------	--	-------------------------------------	----------------	---------------------	-----------------	----------------------	-----------	----------------------------

REMARKS:

Relinquished by: *[Signature]* Date: 12-1-00 Time: 16:00 Received by: *[Signature]* Date: 12/01/00 Time: 12:00

Relinquished by: *[Signature]* Date: 12/01/00 Time: 12:00 Received by: *[Signature]* Date: 12/01/00 Time: 12:00

FAX RESULTS: HOBBS
MAIL RESULTS: EOTT
INVOICE: EOTT Rec. 0.5°C

2000 ANNUAL GROUNDWATER MONITORING REPORT

**EOTT PIPELINE COMPANY
R. L. ROGERS RELEASE SITE
LEA COUNTY, NEW MEXICO**

DRAFT

PREPARED FOR:

**EOTT PIPELINE COMPANY
5805 EAST HIGHWAY 80
MIDLAND, TEXAS 79701**

RECEIVED

MAR 12 2001

**ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION**

PREPARED BY:

**ENVIRONMENTAL TECHNOLOGY GROUP, INC.
2540 WEST MARLAND
HOBBS, NEW MEXICO 88240**

February 2001

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2.0	FIELD ACTIVITIES	1
3.0	GROUND WATER GRADIENT	2
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Figure 1 – Site Location Map

Figures 2 – Inferred Ground Water Gradient Map

TABLES

Table 1 – Ground Water Elevation

Table 2 – Ground Water Chemistry

APPENDICES

Appendix A – Laboratory Reports

1.0 INTRODUCTION

Environmental Technology Group, Inc. (ETGI), on behalf of EOTT Energy Corp. (EOTT), prepared this annual report in compliance with the New Mexico Oil Conservation (NMOCD) regulations. The report presents the results of the quarterly ground water monitoring events for the calendar year 2000 only. Additional site activities and remedial work is summarized in several letters and reports previously submitted to the NMOCD. For reference, a site location map is provided as Figure 1.

Ground water monitoring was conducted during four sampling events in the four quarters of 2000 to assess the levels and extent of dissolved phase and free phase petroleum hydrocarbon constituents. The groundwater monitoring events consisted of measuring static water levels in the monitoring wells, checking for the presence of phase-separated hydrocarbons (PSH), and purging and sampling of each well exhibiting sufficient recharge. Monitoring wells containing measurable levels of PSH were not sampled.

2.0 FIELD ACTIVITIES

The site monitoring wells were gauged and sampled on February 22nd, April 4th, August 29th and November 23rd, 2000. During each sampling event, the monitoring wells designated to be sampled, were purged of approximately 3 well volumes of water or until the wells were dry using a PVC bailer or electrical Grundfos Pump. Purging of monitoring wells was performed to evacuate water that has been stagnant in the well and may not be representative of the aquifer. At least three well volumes were removed from the well before it is sampled.

Groundwater was allowed to recharge and then samples were obtained using disposable Teflon samplers. Monitoring wells with a measurable presence of PSH were not sampled. When numerous monitoring wells were sampled in succession, those wells expected to have low levels of contamination or no contamination were sampled prior to those wells expected to have higher levels of contamination.

VOCs samples were collected as soon as possible after purging, and not more than two hours after purging was completed. If a monitoring well was bailed or pumped dry before three well volumes were obtained, the sample was collected when a sufficient volume of water had accumulated in the well. Following collection of VOC samples, remaining water samples were collected in the following order: polynuclear aromatic hydrocarbons (PAHs); total petroleum hydrocarbons (TPH); metals; and total dissolved

solid (TDS) and water quality parameters. Water samples were stored in clean, glass containers provided by the laboratory and placed on ice in the field. Purge water was collected in a polystyrene tank and disposed of at an NMOCD approved disposal facility. The groundwater analyses are found in Table 1.

3.0 GROUNDWATER GRADIENT

Locations of the monitoring wells and the inferred ground water gradient for each quarterly sampling event are depicted on Figures 2. The ground water elevation data are provided as Table 2. Groundwater elevation contours, generated from the quarterly sampling events of 2000 water level measurements, indicated a general gradient of approximately 0.005 ft/ft to the southwest. The depth to groundwater, as measured from the top of the well casing, ranged between 18 to 17.24 feet for the shallow alluvial aquifer. There was no PSH detected in any of the monitoring wells.

4.0 LABORATORY RESULTS

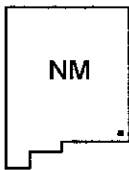
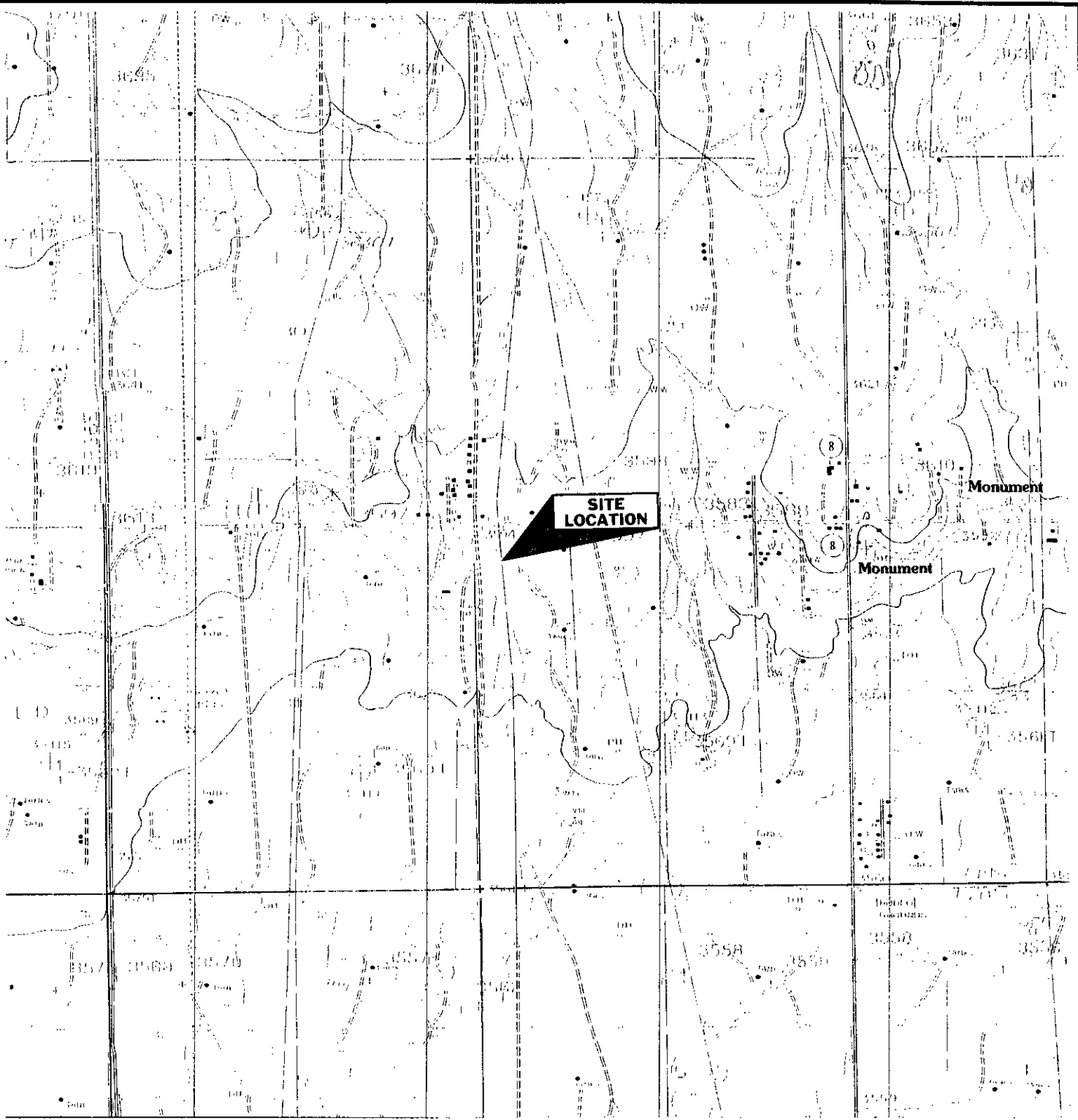
Ground water samples obtained during the quarterly sampling events were hand delivered under Chain of Custody to Environmental Laboratory of Texas, of Midland, Texas for determination of benzene, toluene, ethylbenzene and total xylenes (BTEX) concentrations by EPA Method SW846-8021B, 5030. In addition, the ground water samples collected during the first quarter sampling event were submitted for the analysis of Major Cations and Anions, Metals, Total Dissolved Solids and Poly Aromatic Hydrocarbons (PAH) using EPA Methods 375.4, 325.3, 310, 6010B, 7470, 160.1 and 8270C, 3510 respectively. The ground water chemistry data are provided as Table 1 and the Laboratory Reports are provided as Appendix A.

Laboratory results for all of the site ground water samples, obtained during the 2000 annual period, indicated that BTEX concentrations were below detection limits. All of the ground water samples were below the detection limit for all other analyzed constituents during the first quarter sampling event.

5.0 SUMMARY

This report presents the results of groundwater monitoring for the annual monitoring period of calendar year 2000. No PSH was detected in any of the site wells during the two monitoring events. Dissolved phase concentrations of BTEX were non-detect in all of the monitoring wells. Therefore, there appears to be no dissolved phase petroleum constituent impact to the ground water at the site.

FIGURES



QUADRANGLE LOCATION
S32, T19S, R37E

MONUMENT SOUTH QUADRANGLE
NEW MEXICO
7.5 MINUTE SERIES (TOPOGRAPHIC)



scale: 1" = 2000'

FIGURE 1
SITE LOCATION MAP
EOTT ENERGY CORP.
R. L. RODGERS
LEA COUNTY, NM

PROJECT NO.

EOT 1041C

PREPARED BY:

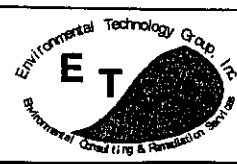
R. STEVENS

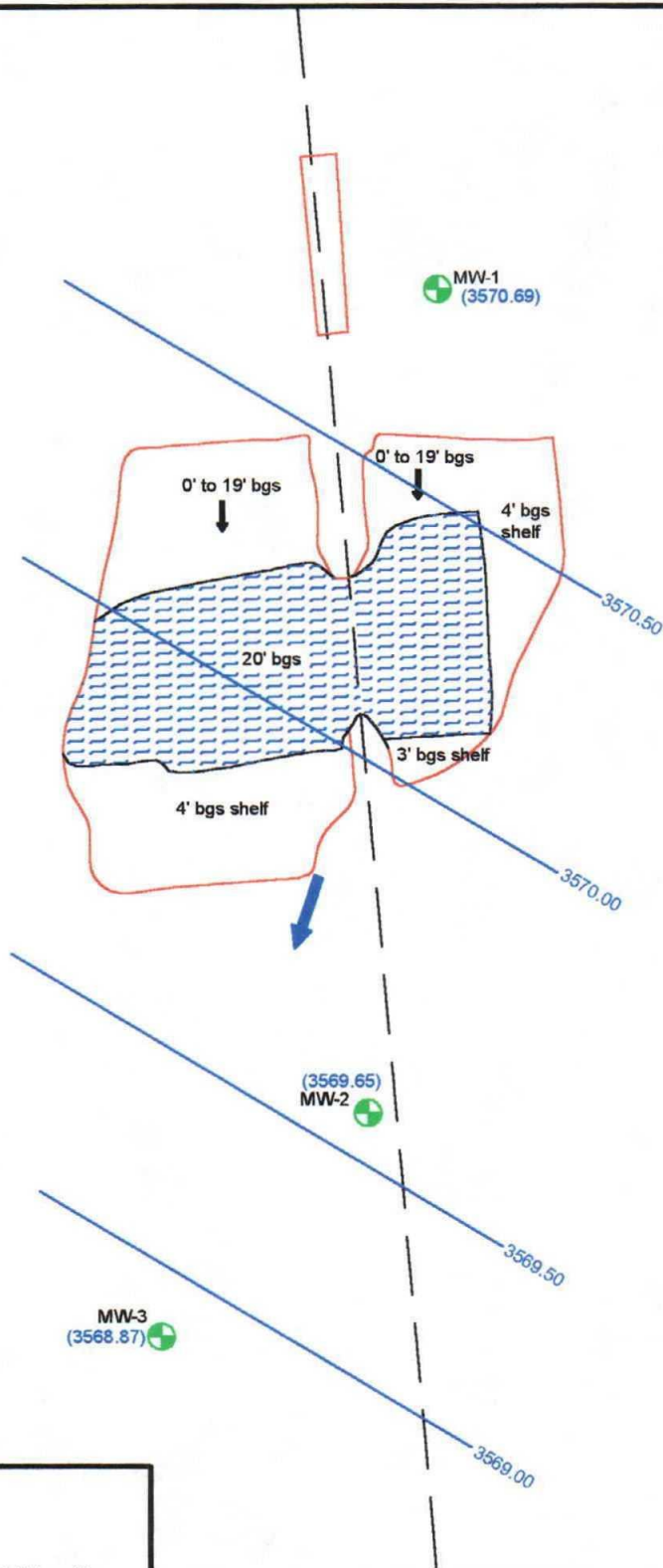
DATE

5-09-00

REVIEWED BY:

J. TAYLOR





LEGEND:

- 0' to 19' Slope in Feet bgs
- ETGI Monitoring Well Locations
- EOTT Pipeline
- Excavation Area
- Groundwater
- Ground Water Contour Lines
- (3546.09) Ground Water Elevations (in feet)

Figure 2
Inferred Ground Water
Gradient Map
EOTT Energy Corp.
R. L. Rodgers
Lea County, NM



Environmental Technology
Group, Inc.

Scale: 1" = 65'	Prep By: RS	Checked By: JT
February 22, 2000	ETGI Project # EOT 1041C	

TABLES

Table 1

**CONCENTRATIONS OF BTEX IN GROUNDWATER
ANNUAL REPORT
EOTT ENERGY CORPORATION
R.L. ROGERS
LEA COUNTY, NM
ETGI Project # EOT 2041C**

All concentrations are in mg/L

SAMPLE LOCATION	SAMPLE DATE	SW 846-8021B, 5030				
		BENZENE	TOLUENE	ETHYL- BENZENE	M,P- XYLENES	O- XYLENES
MW - 1	2/23/00	<0.001	0.001	<0.001	<0.001	<0.001
	4/5/00	0.002	<0.001	0.002	0.009	0.005
	8/29/00	<0.001	<0.001	<0.001	<0.001	<0.001
	11/28/00	<0.001	<0.001	<0.001	<0.001	<0.001
MW - 2	2/23/00	<0.001	0.001	<0.001	<0.001	<0.001
	4/5/00	0.003	0.011	0.001	0.025	0.003
	8/29/00	<0.001	<0.001	<0.001	<0.001	<0.001
	11/28/00	<0.001	<0.001	<0.001	<0.001	<0.001
MW - 3	2/23/00	0.006	0.002	<0.001	0.002	0.002
	4/5/00	0.002	<0.001	<0.001	<0.001	<0.001
	8/29/00	<0.001	<0.001	<0.001	<0.001	<0.001
	11/28/00	<0.001	<0.001	<0.001	<0.001	<0.001

Table 1

CONCENTRATIONS OF METALS IN GROUND WATER

EOTT ENERGY CORPORATION

R.L. ROGERS

LEA COUNTY, NEW MEXICO

EGTI Project # EOT 2041C

All soil concentrations are in mg/kg

All water concentrations are in mg/L

SAMPLE LOCATION	SAMPLE DATE	SAMPLE TYPE	Aluminum	Arsenic	Barium	Beryllium	Cadmium	Calcium	Chromium	Cobalt	Copper	Iron	Lead	Magnesium	Manganese	Mercury	Molybdenum	Nickel	Potassium	Selenium	Silver	Sodium	Tin	Vanadium	Zinc	Boron	Strontium
MW - 1	02/23/00	WATER	0.253	ND	0.141	ND	ND	139.0	ND	ND	ND	0.260	ND	23.90	0.049	ND	ND	ND	6.310	0.005	ND	91.70	ND	ND	ND	0.161	1.33
MW - 2	02/23/00	WATER	2.640	ND	0.244	ND	ND	248.0	0.008	ND	ND	1.680	ND	24.50	0.059	ND	ND	ND	6.920	ND	ND	117.0	ND	0.027	0.055	0.188	1.29
MW - 3	02/23/00	WATER	4.680	0.008	0.183	ND	ND	256.0	0.011	ND	ND	3.240	ND	34.50	0.112	ND	ND	ND	7.340	ND	ND	176.0	ND	0.035	0.700	0.275	1.70

EPA SW846-8010B, 7470

**CHEMICAL CONCENTRATIONS OF IN GROUNDWATER
EOTT ENERGY CORPORATION
R.L. ROGERS
MONUMENT, NEW MEXICO
ETGI Project # EOT 2041C**

All concentrations are in mg/L

SAMPLE LOCATION	SAMPLE DATE	SW 375.4, 325.3, 310, 160.1				
		SULFATE	CHLORIDE	CARBONATE	BICARBONATE	TDS
MW - 1	02/23/00	206	170	0	220	759
MW - 2	02/23/00	186	163	0	330	756
MW-3	02/23/00	230	195	0	335	975

TABLE 2

Ground Water Elevation Annual Report LF 59 Site Lea County, NM ETGI Project # EOT 2041C						
Well Number	Date Measured	Casing Well Elevation	Depth to Product	Depth to Water	PSH Thickness	Corrected Groundwater Elevation
MW - 1	02/23/00	3,572.21	-	29.95	0.00	3,542.26
	04/06/00	3,572.21	-	19.81	0.00	3,552.40
	08/29/00	3,572.21	19.46	19.46	0.30	3,553.01
	11/28/00	3,593.22	-	22.52	0.00	3,570.70
MW - 2	02/23/00	3,571.46	-	22.95	0.00	3,548.51
	04/06/00	3,571.46	-	22.87	0.00	3,548.59
	08/29/00	3,571.46	-	22.06	0.00	3,549.40
	11/28/00	3,591.20	-	21.60	0.00	3,569.60
MW - 3	02/23/00	3,573.46	-	20.92	0.00	3,552.54
	04/06/00	3,573.46	-	20.85	0.00	3,552.61
	08/29/00	3,573.46	-	20.53	0.00	3,552.93
	11/28/00	3,588.85	-	19.86	0.00	3,568.99
	04/06/00	3,570.15	-	20.90	0.00	3,549.25
	08/29/00	3,570.15	20.43	20.54	0.11	3,549.70
MW - 5	02/23/00	3562.92	-	19.8	0.00	3,543.12
	04/06/00	3572.92	-	19.74	0.00	3,553.18
	08/29/00	3572.92	-	19.33	0.00	3,553.59

APPENDICES

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 505-392-3760

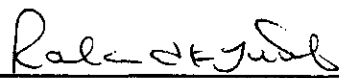
Sample Type: Water
Sample Condition: Intact/ Iced
Project #: EOT 1041C
Project Name: R.L. Rogers
Project Location: Monument, N.M.

Sampling Date: 02/23/00
Receiving Date: 02/24/00
Analysis Date: 02/24/00

ELT#	FIELD CODE	Sulfate mg/L	Chloride mg/L	Carbonate mg/L	Bicarbonate mg/L	TDS mg/L
23713	MW-1	206	170	0	220	759
23714	MW-2	186	163	0	330	756
23715	MW-3	230	195	0	335	975

QUALITY CONTROL	52.7	5318	*	*	*
TRUE VALUE	50.0	5000	*	*	*
% PRECISION	105	106	*	*	*

METHODS: EPA 375.4, 325.3, 310, 160.1


Raland K. Tuttle

2-28-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 505-392-3760

Sample Type: Water
Sample Condition: Intact/ Iced
Project #: EOT 1041C
Project Name: R.L. Rogers
Project Location: Monument, N.M.
Field Code: MW-1

Sampling Date: 02/23/00
Receiving Date: 02/24/00
Extraction Date: 02/25/00
Analysis Date: 02/25/00

EPA SW846 8270 (mg/l)	REPORT LIMIT	ELT# 23713	RPD	%EA	%IA
Naphthalene	0.005	ND			92
Acenaphthylene	0.005	ND			94
Acenaphthene	0.005	ND	2.90	68	94
Fluorene	0.005	ND			98
Phenanthrene	0.005	ND			102
Anthracene	0.005	ND			92
Fluoranthene	0.005	ND			94
Pyrene	0.005	ND	1.50	66	88
Benzo[a]anthracene	0.005	ND			92
Chrysene	0.005	ND			92
Benzo[b]fluoranthene	0.005	ND			94
Benzo[k]fluoranthene	0.005	ND			100
Benzo[a]pyrene	0.005	ND			100
Indeno[1,2,3-cd]pyrene	0.005	ND			84
Dibenz[a,h]anthracene	0.005	ND			104
Benzo[g,h,i]perylene	0.005	ND			100

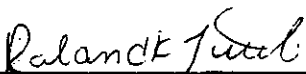
% RECOVERY

Nitrobenzene-d5 SURR
2-Fluorobiphenyl SURR
Terphenyl-d14 SURR

76
86
81

ND= NOT DETECTED

Method: EPA SW 846 8270C . 3510


Raland K. Tuttle

2-29-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 505-392-3760

Sample Type: Water
Sample Condition: Intact/ Iced
Project #: EOT 1041C
Project Name: R.L. Rogers
Project Location: Monument, N.M.
Field Code: MW-2

Sampling Date: 02/23/00
Receiving Date: 02/24/00
Extraction Date: 02/25/00
Analysis Date: 02/25/00

EPA SW846 8270 (mg/l)	REPORT LIMIT	ELT# 23714	RPD	%EA	%IA
Naphthalene	0.005	ND			92
Acenaphthylene	0.005	ND			94
Acenaphthene	0.005	ND	2.90	68	94
Fluorene	0.005	ND			98
Phenanthrene	0.005	ND			102
Anthracene	0.005	ND			92
Fluoranthene	0.005	ND			94
Pyrene	0.005	ND	1.50	66	88
Benzo[a]anthracene	0.005	ND			92
Chrysene	0.005	ND			92
Benzo[b]fluoranthene	0.005	ND			94
Benzo[k]fluoranthene	0.005	ND			100
Benzo[a]pyrene	0.005	ND			100
Indeno[1,2,3-cd]pyrene	0.005	ND			84
Dibenz[a,h]anthracene	0.005	ND			104
Benzo[g,h,i]perylene	0.005	ND			100

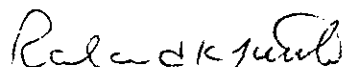
% RECOVERY

Nitrobenzene-d5 SURR
2-Fluorobiphenyl SURR
Terphenyl-d14 SURR

78
84
91

ND= NOT DETECTED

Method: EPA SW 846 8270C, 3510


Raland K. Tuttle

2-29-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 505-392-3760

Sample Type: Water
Sample Condition: Intact/ Iced
Project #: EOT 1041C
Project Name: R.L. Rogers
Project Location: Monument, N.M.
Field Code: MW-3

Sampling Date: 02/23/00
Receiving Date: 02/24/00
Extraction Date: 02/25/00
Analysis Date: 02/25/00

EPA SW846 8270 (mg/l)	REPORT LIMIT	ELT# 23715	RPD	%EA	%IA
Naphthalene	0.005	ND			92
Acenaphthylene	0.005	ND			94
Acenaphthene	0.005	ND	2.90	68	94
Fluorene	0.005	ND			98
Phenanthrene	0.005	ND			102
Anthracene	0.005	ND			92
Fluoranthene	0.005	ND			94
Pyrene	0.005	ND	1.50	66	88
Benzo[a]anthracene	0.005	ND			92
Chrysene	0.005	ND			92
Benzo[b]fluoranthene	0.005	ND			94
Benzo[k]fluoranthene	0.005	ND			100
Benzo [a]pyrene	0.005	ND			100
Indeno[1,2,3-cd]pyrene	0.005	ND			84
Dibenz[a,h]anthracene	0.005	ND			104
Benzo[g,h,i]perylene	0.005	ND			100

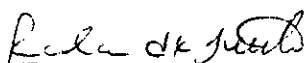
% RECOVERY

Nitrobenzene-d5 SURR
2-Fluorobiphenyl SURR
Terphenyl-d14 SURR

76
82
84

ND= NOT DETECTED

Method: EPA SW 846 8270C, 3510


Raland K. Tuttle

2-29-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 505-392-3760


Sample Type: Water
Sample Condition: Intact/ Iced/HCl
Project #: EOT 1041C
Project Name: R.L. Rogers
Project Location: Monument, N.M.

Sampling Date: 02/23/00
Receiving Date: 02/24/00
Analysis Date: 02/24/00

ELT#	FIELD CODE	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYLBENZENE (mg/L)	m,p-XYLENE (mg/L)	o-XYLENE (mg/L)
23713	MW-1	<0.001	0.001	<0.001	<0.001	<0.001
23714	MW-2	<0.001	0.001	<0.001	<0.001	<0.001
23715	MW-3	0.006	0.002	<0.001	0.002	0.002

% IA	94	89	89	90	89
% EA	95	90	90	91	90
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: EPA SW 846-8021B,5030


Raland K. Tuttle

2-28-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 505-392-3760


Sample Type: Water
Sample Condition: Intact/Iced/HNO3
Project #: EOT 1041C
Project Name: R.L. Rogers
Project Location: Monument, N.M.

Sample Date: 02/23/00
Receiving Date: 02/24/00
Analysis Date: 02/26/00

Analyte (mg/L)	MW-1 23713	MW-2 23714	MW-3 23715	Reporting Limit	%IA	%EA	BLANK	RPD
Aluminum	0.2530	2.640	4.680	0.0500	104	111	<0.0500	1.22
Arsenic	ND	ND	0.0080	0.0500	104	110	<0.0050	3.70
Barium	0.1410	0.2440	0.1830	0.0100	102	101	<0.0100	2.82
Beryllium	ND	ND	ND	0.0040	96	96	<0.0040	2.11
Cadmium	ND	ND	ND	0.0010	94	94	<0.0010	2.15
Calcium	139.0	248.0	256.0	1.000	96	*	<1.000	0.69
Chromium	ND	0.0080	0.0110	0.0050	94	92	<0.0050	2.19
Cobalt	ND	ND	ND	0.0200	95	94	<0.0200	2.60
Copper	ND	ND	ND	0.0100	93	97	<0.0100	3.36
Iron	0.2600	1.680	3.240	0.0500	99	98	<0.0500	0.81
Lead	ND	ND	ND	0.0030	94	94	<0.0030	2.15
Magnesium	23.90	24.50	34.50	1.000	99	*	<1.000	0.41
Manganese	0.0490	0.0590	0.1120	0.0150	94	93	<0.0150	2.56
Mercury	ND	ND	ND	0.00020	95	106	<0.00020	0.94
Molybdenum	ND	ND	ND	0.050	94	96	<0.050	2.32
Nickel	ND	ND	ND	0.0100	95	92	<0.0100	2.63
Potassium	6.310	6.920	7.340	1.000	85	*	<1.000	0.77
Selenium	0.0050	ND	ND	0.0050	108	108	<0.0050	1.71
Silver	ND	ND	ND	0.00500	94	92	<0.0050	0.00
Sodium	91.70	117.0	176.0	1.000	112	*	<1.000	0.42
Tin	ND	ND	ND	0.0500	104	103	<0.0500	1.96
Vanadium	ND	0.0270	0.0350	0.0200	94	96	<0.0200	2.52
Zinc	ND	0.0550	0.0700	0.0200	97	99	<0.0200	3.29
Boron	0.161	0.188	0.275	0.050	103	107	<0.050	1.64
Strontium	1.33	1.29	1.70	0.050	97	91	<0.050	2.26

ND = Below Reporting Limit

METHOD: EPA SW846-6010B, 7470


Raland K. Tuttle

2-29-00
Date

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

68 200

Project Name:

35529 / 25604

Phone #: (915) 664-9164
FAX #: (505) 392-3260

Company Name & Address: *777*

795704
TX
P.O. Box 4845- 10712-0485

2023/04/23

LOT 107


Project Name :

NAME: R. L. Rogers

Project Location:

Adrian, Wm

Sampler Signature:

Signature: 

[illegible]

GTEx 801205036	TPH 418.1
TCPL Metals Ag As Ba Cd Cr Pb Hg Se	TCPL Metals Ag As Ba Cd Cr Pb Hg Se
TCPL Volatiles	TCPL Volatiles
TCPL Semi Volatiles	TCPL Semi Volatiles
TOS 140.1	TCI
PAH 8100 ~ 8270	
Hydrocarbons 6010	
0.0774% 6010	
0.0005 300.0	

Relinquished by:

Amor Lasas

Date:

2/24/00

Times:

0.800

Received by

Received by: 

செய்து

7-10-1941

Date:

24 FEB 2000

11

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॥ श्रीगणेशाय नमः ॥

Received by:

Relinquished by:

Unpublished by:

Date:

Date: _____

Time:

Time:

REMARKS

Marie Lesuer: K. Dutton

Rust

James McManus

Invoice: German Fract 1015m

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 915-520-4310
FAX: 505-392-3760

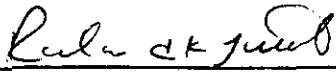
SampleType: Water
Sample Condition: Intact/ Iced/HCl
Project #: EOT 1041C
Project Name: R.L. Rogers
Project Location: Monument, N.M.

Sampling Date: 04/05/00
Receiving Date: 04/06/00
Analysis Date: 4/10/00

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
24647	MW-1	0.002	<0.001	0.002	0.009	0.005
24648	MW-2	0.003	0.011	0.001	0.025	0.003
24649	MW-3	0.002	<0.001	<0.001	<0.001	<0.001

% IA	91	90	92	95	88
% EA	94	92	94	97	90
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8021B,5030


Raland K. Tuttle

4-12-00
Date

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

(915) 563-1800 FAX (915) 563-1713

LOC # 119

Project Manager: Jesse Turner

Phone # (516) 291-9162

FAX#:(705) 392-3760

Company Name & Address: *2767*

A.O. Box 4845 MIDLAND TX 79704

॥ १२३॥

Project Name :

FOI 10410

R. L. Rodgers

Project Location:

Sampler Signature:

ADJUDICANT, Wm

James P. Cross

LAB # (LAB USE) (ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX					PRESERVATIVE METHOD					SAMPLING		
				WATER	SOIL	AIR	SLUDGE	OTHER	HCL	HNO3	ICE	NONE	OTHER	DATE	TIME	
24647	MW1	2	✓	X						X		X			7-5	1335
24648	MW2	✓	✓	✓						✓		✓			✓	1320
24649	MW3	✓	✓	✓						✓		✓			✓	1305

SAMPLING	DATE	TIME
	2007	
	4-5	1325
		1320
		1305

TPH	418.1
TCLP Metals Ag As	
Total Metals Ag As	
TCLP Volatiles	
TCLP Semi Volatiles	
TDS	
RCI	

Relinquished by:

Date:

Time:

Received by

318755

[Signature]

44-1-0A

1200

1

CONFIDENTIAL

Mr. [illegible]

Refrigerated by:

Date:

Time:

Received for

Relinquished by:

Date:

Time:

Received by T

1104

CONFIDENTIAL

28.11

1000

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ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: BETH ALDRICH
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 915-520-4310

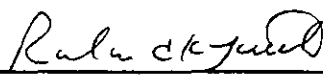
SampleType: Water
Sample Condition: Intact/ Iced/ HCI/ 27 deg. F
Project #: EOT 2041C
Project Name: R.L. Rogers
Project Location: Monument, N.M.

Sampling Date: 08/29/00
Receiving Date: 08/30/00
Analysis Date: 09/05/00

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L	TOTAL BTX mg/L
30255	MW 1	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
30256	MW 2	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
30257	MW 3	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

% IA	103	100	103	106	99
% EA	104	104	106	110	102
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8021B,5030


Raland K. Tuttle

9-6-00
Date

ENVIRONMENTAL LAB OF , INC.

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ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: BETH ALDRICH
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 915-520-4310
FAX: 505-397-4701

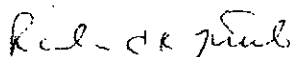
Sample Type: Water
Sample Condition: Intact/ Iced/ HCl/ 0.5 deg. C
Project #: EOT 2041C
Project Name: R.L. Rogers
Project Location: Monument, N.M.

Sampling Date: 11/28/00
Receiving Date: 12/02/00
Analysis Date: 12/03/00

ELT #	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
34584	MW 1	<0.001	<0.001	<0.001	<0.001	<0.001
34585	MW 2	<0.001	<0.001	<0.001	<0.001	<0.001
34586	MW 3	<0.001	<0.001	<0.001	<0.001	<0.001
34587	EB 1	<0.001	<0.001	<0.001	<0.001	<0.001

%IA	95	102	100	103	98
%EA	96	102	100	104	98
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: EPA SW 846-8021B, 5030


Roland K. Tuttle

12-4-00
Date

[illegible]

DRAFT

**ADDITIONAL SUBSURFACE INVESTIGATION REPORT
(PURSUANT TO STAGE 1 ABATEMENT PLAN)**

COPY

**EOTT ENERGY CORP
R. L. ROGERS RELEASE SITE
LEA COUNTY, NEW MEXICO**

RECEIVED

MAR 12 2001

**Prepared For:
EOTT Energy Corp
5805 East Highway 80
Midland, Texas 79701**

**ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION**

Environmental Technology Group, Inc. Project No. EOT2041C

**Prepared By:
Environmental Technology Group, Inc.
2540 West Marland Boulevard
Hobbs, New Mexico 88240**

February 2001

A Report Prepared for:

EOTT Energy Corp
5805 East Highway 80
Midland, Texas 79701

Additional Subsurface Investigation Report

(Pursuant to Stage 1 Abatement Plan)

Environmental Technology Group, Inc. Project No. EOT2041C

Prepared by:

Beth Aldrich
Sr. Project Manager/ Staff Geologist

Jerry Nickell
Managing Principal

Environmental Technology Group, Inc.
4600 West Wall Street
Midland, Texas 79703

February 2001

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FIGURE 2:	Soil sampling Map
FIGURE 3:	Additional Boring Site Map

APPENDICES

APPENDIX A:	Soil Boring Log
APPENDIX B:	Laboratory Analytical Data

1.0 INTRODUCTION AND SITE BACKGROUND

The site is located approximately two miles west of the town of Monument, New Mexico, in the NE ¼, NW ¼, Section 32, Township 19 South, Range 37 East. A site location map is provided as Figure 1.

The topography of the site is relatively flat with a slight topographic slope to the south. The site is located in a rural/residential area with a residence located approximately 800 feet to the north. Generally, the surface consists of unconsolidated sand covered by sparse grasses and mesquite trees. There are no structures or facilities at the site and the only site features are the excavation and monitoring wells as depicted on Figure 2, the Site Map. The excavation is partially filled with water, the surface elevation of which corresponds to the elevation of ground water in the adjacent monitoring wells.

The excavation, made in order to facilitate soil remediation, was completed under the direct supervision of EOTT Energy Corp. (EOTT). Any questions regarding this feature should be directed to Mr. Wayne Brunette of EOTT. At the request of EOTT, Environmental Technology Group, Inc. (ETGI) completed three borings as monitoring wells around the existing excavation and collected confirmation side wall samples.

Further side wall sampling was conducted in the excavation prior to its backfilling. An additional soil boring was advanced adjacent to the pipeline after the backfilling of the excavation was completed. These items are discussed below.

2.0 RECENT FIELD ACTIVITIES

On June 19, 2000, additional sampling was performed on the south wall of the excavated area at a depth of approximately 20 feet below ground surface (bgs). Three grab samples were taken from the sidewalls in the excavated area beneath the pipeline. The location of the sampling sites is provided in Figure 2, Sampling Location Map. The samples were submitted for laboratory analysis and analyzed for benzene, toluene, ethyl benzene and xylenes (BTEX) EPA Method 8021B, 5030. These results are found in Table 1.

The materials that were excavated and stockpiled northeast of the excavated area were also sampled. The location of the stockpile area is provided in Figure 2, Sampling Location Map. Four representative samples were taken of the stockpile area and submitted for laboratory analysis. These samples were also analyzed for BTEX using the same method. These results are also found in Table 1.

The excavation was backfilled under the direction of Mr. Wayne Brunette. After completion of the backfilling, ETGI mobilized a rotary drilling rig on September 22, 2000 to conduct advancement of a soil boring (SB-1) on the west side of the pipeline, near the previously sampled points. The soil boring location is found on Figure 3, Additional Soil Boring Site Map. The soil boring was sampled at five foot intervals utilizing a split soon sampler where applicable. The soil boring log is provided in Appendix A.

Each soil sample was field screened with a photoionization detector (PID). All samples demonstrating PID readings in excess of 100 ppm for Volatile Organic Compounds (VOCs) were analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX) by EPA SW 846 Methods 8021B. No field screening result was in excess of 100 ppm, therefore no laboratory analyses for BTEX were conducted. All soil samples selected for laboratory analysis were subjected to total petroleum hydrocarbon (TPH) analysis using EPA Method 8015M GRO/DRO. For reference, the soil laboratory analytical results are posted on Table 2. All laboratory reports are provided as Appendix B.

3.0 GEOLOGY/HYDROGEOLOGY

In the site vicinity, the surface is composed of unconsolidated, wind blown sands and finer materials associated with the Tertiary Ogallala Formation, which serves as a major aquifer for southeastern New Mexico and several high plains states. Alluvial, unconfined ground water is typically present in these sands at varying depths and generally flows from the north to the south. These aquifers are typically characterized by relatively high hydraulic conductivity and transmissivity.

The Triassic Dockum Formation, commonly referred to as the "red beds", underlies the Ogallala. While there are sand lenses within the Dockum, it is more typically characterized by red silts and shales in which detectable ground water is often absent or limited in extent. Where ground water is present, the aquifer is usually characterized by relatively low hydraulic conductivity and transmissivity.

At the site, the subsurface is composed of approximately 20 feet of sand and caliche that unconformably overlies a horizon of red clay. The red clay corresponds to the Dockum Formation or "red beds". The top of the Dockum Formation represents an erosional surface on which the sands were later deposited. Areas of thick sand sections correspond to areas of greater erosion of the Dockum.

The ground water table occurs at a depth of approximately 18 feet bgs (21 feet from the top of the extended casing), which is near the interface of sand and clay at the site. Monitoring wells completed in that portion of the site area where the ground water occurs within the sand are characterized by high recharge rates and the measured hydraulic conductivity is high. Monitoring wells completed in that portion of the site where the ground water occurs in the red clay are characterized by slow recharge rates and low hydraulic conductivity.

The concentration of total dissolved solids (TDS) ranged from 759 to 975 mg/L in the samples collected from the site monitoring wells. As per New Mexico WQCC statute 20.6.2 Subpart III.3101 and OCD Rule 19 NMAC 15.A.19.A, ground water with TDS concentrations of 10,000 mg/L or less are designated for beneficial use and subject to remediation.

4.0 RESULTS

4.1 NEW MEXICO OIL CONSERVATION (OCD) SOIL CLASSIFICATION

During the additional site investigation, Highly Contaminated/Saturated Soils, as described by the Oil Conservation Division (OCD) Guidelines (OCD, 1993), were not detected in the sidewall samples from the excavation, in the samples from the stockpile area or in SB-1.

The depth to ground water, as measured from the surface, ranges from 17 to 19.5 feet bgs, which corresponds to 20 to 22.5 as measured from the extended casing top. A water supply well is located approximately 800 feet to the northeast. There are no surface water bodies within 200 feet of the site. These conditions result in an OCD Ranking Score of greater than 19 points. The OCD soil remediation action levels for a site with a Ranking Score of greater than 19 are as follows:

- Benzene - 10 ppm
- BTEX - 50 ppm
- TPH - 100 ppm

Further reference to impacted soil in this report refers to soils that exceed this standard.

4.2 DISTRIBUTION OF HYDROCARBONS IN SOIL

Slightly elevated levels of BTEX and TPH above the OCD regulatory limits were observed in the soils from the sidewall samples. Slightly elevated levels of BTEX and TPH were also observed in the soils from areas A and D of the stockpile area. Further landfarming of the stockpile area was to be conducted before backfilling was begun.

No evidence of petroleum impact was observed in the soil boring (SB-1) location. The soil boring was advanced to through the water table to the "red bed". The concentrations of TPH from these samples are below the detection limit, which in turn, is below the OCD regulatory limit. The method detection limit for TPH, used for all soil boring soil samples, is below the OCD regulatory limit.

4.3 DISTRIBUTION OF HYDROCARBONS IN GROUND WATER

The groundwater was not addressed in this investigation.

5.0 SUMMARY AND CONCLUSIONS

The soils sampled in the sidewalls of the excavation beneath the pipeline exhibited slightly elevated levels of BTEX and TPH above the OCD regulatory limits. Further excavation was necessary beneath the pipeline before backfilling was begun. Slightly elevated levels of BTEX and TPH were also observed in the soils from areas A and D of the stockpile area. Further landfarming of the soils in the stockpile area was necessary

before backfilling was begun. The backfilling of the excavation was under the direction of Mr. Wayne Brunette.

On completion of the backfilling of the excavation, a soil boring was advanced on the west side of the pipeline, near the previous sampling points on the sidewalls of the excavation. No evidence of petroleum impact (as defined above) was observed in the soil boring (SB-1) in any sample to total depth, approximately 30 feet bgs.

6.0 SCHEDULE OF ACTIVITIES

The excavation has been backfilled and the site restored to its natural contour. The recommended quarterly sampling events were completed for the year 2000. The laboratory results for the quarterly monitoring well sampling events indicate no groundwater contamination above the New Mexico Water Quality Control Commission (NMWQCC) standards. This information will be provided under separate cover in a Annual Groundwater Monitoring Report.

This annual report will be submitted prior to April 1, 2001. If the contaminants of concern concentrations in the groundwater have remained below OCD regulatory standards, this report will also constitute the summary report and a request for closure will be made at that time.

7.0 QUALITY ASSURANCE/QUALITY CONTROL (QA/QC) PROCEDURES

7.1 Soil Sampling

Samples of subsurface soils were obtained utilizing either a split spoon sampler or a grab sample (air rotary drilling rig). Representative soil samples were divided into two separate portions using clean, disposable gloves and clean sampling tools. One portion of the soil sample was placed in a disposable sample bag. The bag was labeled and sealed for head space analysis using a PID calibrated to a 100 ppm isobutylene standard. Each sample was allowed to volatilize for approximately 30 minutes at ambient temperature prior to conducting the analysis.

The other portion of the soil sample was placed in a sterile glass container equipped with a Teflon lined lid furnished by the analytical laboratory. The container was filled to capacity to limit the amount of head space present. Each container was labeled and placed on ice in an insulated cooler. Upon selection of samples for analysis, the cooler was sealed for shipment to the laboratory. Proper chain-of-custody documentation was maintained throughout the sampling process.

Soil samples were delivered to Environmental Lab of Texas, Inc. in Midland, Texas for BTEX and TPH analyses using the methods described below. Soil samples were analyzed for BTEX and TPH-GRO/DRO within 14 days following the collection date.

The soil samples will be analyzed as follows:

- BTEX concentrations in accordance with EPA Method 8021B, 5030
- TPH concentrations in accordance with modified EPA Method 8015-GRO/DRO

7.2 Ground Water Sampling

Groundwater was not addressed in this investigation, therefore QA/QC protocol are not applicable.

7.3 Decontamination Of Equipment

Cleaning of drilling equipment was the responsibility of the drilling company. In general, the cleaning procedures consisted of using high pressure steam to wash the drilling and sampling equipment prior to drilling and prior to starting each hole. Prior to use, the sampling equipment was cleaned with Liqui-Nox[®] detergent and rinsed with distilled water.

7.4 Laboratory Protocol

The laboratory was responsible for proper QA/QC procedures after signing the chain-of-custody form. These procedures were either transmitted with the laboratory reports or are on file at the laboratory. A review of the QA/QC data, transmitted with the laboratory reports, were reviewed by ETGI personnel. All instrumentation and extraction accuracy ranges were within acceptable limits. All blank samples were non-detect for the tested constituents and holding times, for all samples, were within established limits.

8.0 LIMITATIONS

Environmental Technology Group, Inc. has prepared this Additional Site Investigation Report to the best of its ability. No other warranty, expressed or implied, is made or intended.

Environmental Technology Group, Inc. has examined and relied upon documents referenced in the report and has relied on oral statements made by certain individuals. Environmental Technology Group, Inc. has not conducted an independent examination of the facts contained in referenced materials and statements. We have presumed the genuineness of the documents and that the information provided in documents or statements is true and accurate. Environmental Technology Group, Inc. has prepared this report in a professional manner, using the degree of skill and care exercised by similar environmental consultants. Environmental Technology Group, Inc. also notes that the facts and conditions referenced in this report may change over time and the conclusions and recommendations set forth herein are applicable only to the facts and conditions as described at the time of this report.

This report has been prepared for the benefit of EOTT Energy Corp. The information contained in this report including all exhibits and attachments, may not be used by any other party without the express consent of Environmental Technology Group, Inc. and/or EOTT Energy Corp.

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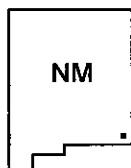
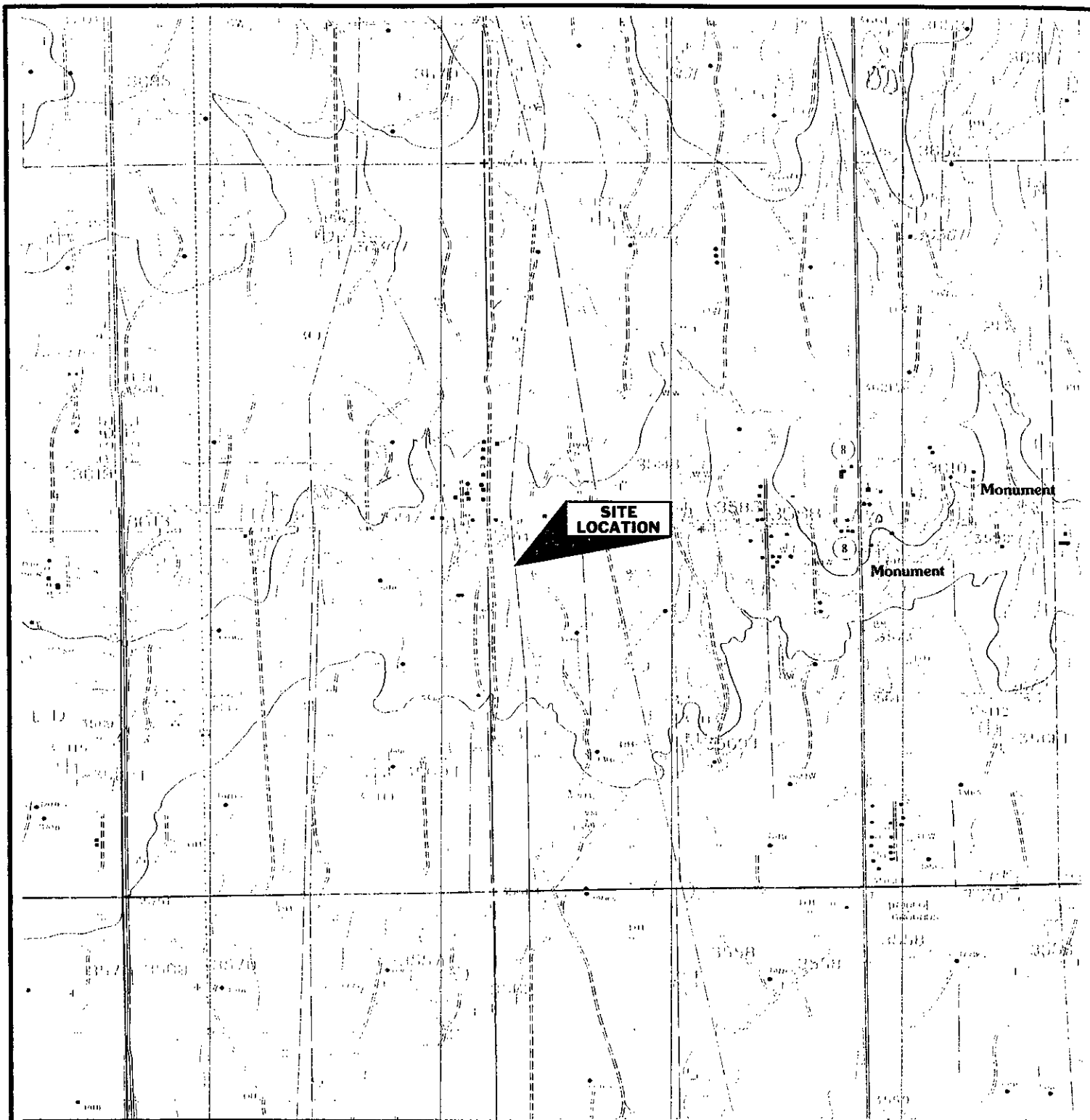
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4600 West Wall Street
Midland, Texas 79703

Copy 4 to: Environmental Technology Group, Inc.
2540 West Marland
Hobbs, New Mexico 88240

COPY NO.: _____

FIGURES



QUADRANGLE LOCATION
S32, T19S, R37E

MONUMENT SOUTH QUADRANGLE
NEW MEXICO
7.5 MINUTE SERIES (TOPOGRAPHIC)



scale: 1" = 2000'

FIGURE 1
SITE LOCATION MAP
EOTT ENERGY CORP.
R. L. RODGERS
LEA COUNTY, NM

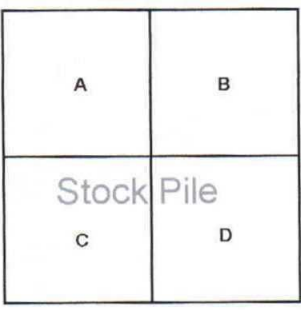
PROJECT NO.
EOT 1041C

PREPARED BY:
R. STEVENS

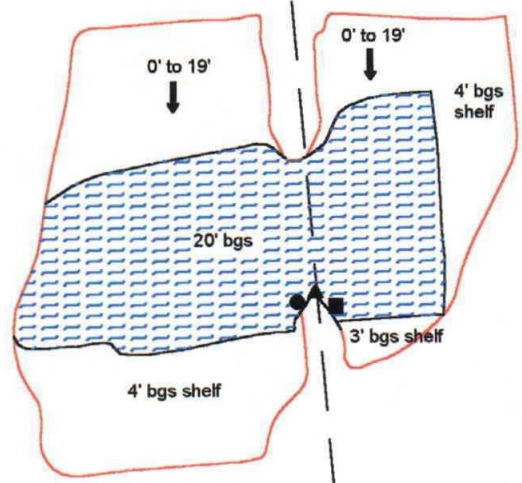
DATE
5-09-00

REVIEWED BY:
J. TAYLOR





MW-1



MW-2

MW-3

- LEGEND:
- ▲ Central End Sample
 - East End Sample
 - West End Sample
 - 0' to 19'
↓ Slope in Feet bgs
 - ETGI Monitoring Well Locations
 - ETGI Soil Boring Location
 - EOTT Pipeline
 - Excavated Area
 - Groundwater

Figure 2
Sampling Location Map

EOTT Energy Corp.
R. L. Rodgers
Lea County, NM



Environmental Technology Group, Inc.

Scale: 1" = 65'	Prep By: RS	Checked By: JT
June 19, 2000	ETGI Project # EOT 1041C	



MW-1

SB-1

MW-2

MW-3

LEGEND:




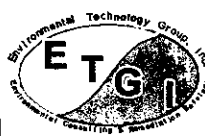
-  ETGI Monitoring Well Locations
-  ETGI Soil Boring Location
-  EOTT Pipeline

Figure 3
Site Map
Additional Soil Borings
EOTT Energy Corp.
R. L. Rodgers
Lea County, NM



Environmental Technology
Group, Inc.

Scale: 1" = 65'	Prep By: RS	Checked By: JT
September 22, 2000	ETGI Project # EOT 1041C	

TABLES

TABLE 1

**SUMMARY OF SOIL CHEMISTRY
R.L. ROGERS RELEASE SITE
LEA COUNTY, NM
ETGI PROJECT #EOT2041C**

SAMPLE LOCATION	SAMPLE DATE	Methods: EPA SW 8746-8021B, 5030				
		BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL- BENZENE (mg/kg)	m,p-XYLENE (mg/kg)	o-XYLENE (mg/kg)
Stockpile Area A	6/19/00	<0.100	0.125	<0.100	0.205	0.151
Stockpile Area B	6/19/00	<0.100	<0.100	<0.100	<0.100	<0.100
Stockpile Area C	6/19/00	<0.100	<0.100	<0.100	<0.100	<0.100
Stockpile Area D	6/19/00	<0.100	0.219	<0.100	0.141	<0.100
SE Bottom East End	6/19/00	<0.100	0.786	0.325	2.10	0.980
SE Bottom Central	6/19/00	<0.100	0.64	0.185	0.875	0.306
SE Bottom West End	6/19/00	<0.100	0.205	0.160	1.53	0.790

TABLE 2

**SUMMARY OF SOIL CHEMISTRY
R.L. ROGERS RELEASE SITE
LEA COUNTY, NM
ETGI PROJECT #EOT2041C**


SAMPLE LOCATION	SAMPLE DATE	Methods: EPA SW 846-8015M GRO/DRO	
		GRO (mg/kg)	DRO (mg/kg)
Soil Boring 1 - 0'-2'	9/22/00	<10	58.00
Soil Boring 1 - 3'-5'	9/22/00	<10	19.00
Soil Boring 1 - 8'-10'	9/22/00	<10	<10
Soil Boring 1 - 13'-15'	9/22/00	<10	<10
Soil Boring 1 - 18'-20'	9/22/00	<10	<10
Soil Boring 1 - 23'-25'	9/22/00	<10	<10
Soil Boring 1 - 28'-30'	9/22/00	<10	<10

APPENDICES

Soil Boring SB-1

Legend

PID Head-space reading in ppm obtained with a photo-ionization detector.

Depth (feet)	Soil Columns	PID Reading	Petroleum Odor	Petroleum Stain	Soil Description
0		(0.4)	None	None	Sand - (SM) - Dark Brown, very fine grained, well sorted with caliche nodules.
5		(0.8)	None	None	Sand - (SM) - Dark Brown, very fine grained, well sorted with caliche nodules.
10		(1.2)	None	None	Sand - (SM) - Dark Brown, very fine grained, well sorted with caliche nodules.
15		(0.9)	None	None	Caliche layer
20		(1.0)	None	None	Clay
25		(1.2)	None	None	Sand - (SP) - Tan, very fine grained, well sorted.
30	TD	(1.1)	None	None	Sand - (SP) - Red - Brown, very fine grained, well sorted, with clay nodules.

Soil Boring Details

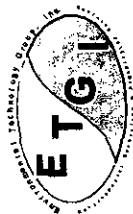
Date Drilled 09/22/00
Backfilled with soil

Soil Boring Log Details

Soil Boring SB-1

EOTT Energy Corp. R. L. Rodgers Lea County, NM

Environmental Technology
Group, Inc.



Scale: NTS
October 28, 2000
Prep By: RS
Checked By: KD
ETGI Project # EOT 2041C

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: BETH ALDRICH
2540 W. MARLAND
HOBBS, N.M. 88240
FAX: 505-397-4701
FAX: 915-520-4310

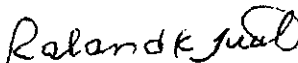
SampleType: Soil
Sample Condition: Intact/ Iced/ 33 deg. F
Project #: EOT 2041C
Project Name: R.L. Rodgers
Project Location: None Given

Sampling Date: 06/19/00
Receiving Date: 06/20/00
Analysis Date: 06/20/00

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
27018	Stockpile Area A (g)	0.110	0.125	<0.100	0.205	0.151
27019	Stockpile Area B (g)	<0.100	<0.100	<0.100	<0.100	<0.100
27020	Stockpile Area C (g)	<0.100	<0.100	<0.100	<0.100	<0.100
27021	Stockpile Area D (g)	<0.100	0.219	<0.100	0.141	<0.100
27022	SE Bottom East End (g)	<0.100	0.786	0.327	2.10	0.980
27023	SE Bottom Central (g)	<0.100	0.640	0.185	0.875	0.306
27024	SE Bottom West End (g)	<0.100	0.205	0.160	1.53	0.790

% IA	91	87	86	94	87
% EA	88	85	86	91	86
BLANK	<0.100	<0.100	<0.100	<0.100	<0.100

METHODS: SW 846-8021B.5030


Raland K. Tuttle

6-21-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: BETH ALDRICH
2540 W. MARLAND
HOBBS, N.M. 88240
FAX: 505-397-4701
FAX: 915-520-4310

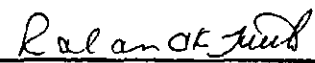
SampleType: Soil
Sample Condition: Intact/ loosed/ 33 deg. F
Project #: EOT 2041C
Project Name: R.L. Rogers
Project Location: None Given

Sampling Date: 06/19/00
Receiving Date: 06/20/00
Analysis Date: 06/20/00

ELT#	FIELD CODE	GRO	DRO
		C6-C10 mg/kg	>C10-C28 mg/kg
27018	Stockpile Area A (g)	<10	127
27019	Stockpile area B (g)	<10	118
27020	Stockpile Area C (g)	<10	233
27021	Stockpile Area D (g)	<10	282
27022	SE Bottom East End (g)	72	469
27023	SE Bottom Central (g)	<10	<10
27024	SE Bottom West End (g)	<10	22

% IA	89	102
% EA	87	127
BLANK	<10	<10

METHODS: SW 846-8015M GRO/DRO


Raland K. Tuttle

6-21-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.

ATTN: BETH ALDRICH

P.O. BOX 4845

MIDLAND, TEXAS 797004

FAX: 915-520-4310

FAX: 505-397-4701

SampleType: Soil

Sample Condition: Intact/ Iced

Project #: 2041C

Project Name: R.L. Rogers

Project Location: Monument, N.M.

Sampling Date: 09/22/00

Receiving Date: 10/03/00

Analysis Date: 10/03/00

ELT#	FIELD CODE	GRO	DRO
		C6-C10 mg/kg	>C10-C28 mg/kg
31636	SB-1 0-2	<10	58
31637	SB-1 3-5	<10	19
31638	SB-1 8-10	<10	<10
31639	SB-1 13-15	<10	<10
31640	SB-1 18-20	<10	<10
31641	SB-1 23-25	<10	<10
31642	SB-1 28-30	<10	<10

% IA

78

98

% EA

89


92

BLANK

<10

<10

METHODS: SW 846-8015M GRO/DRO


Roland K. Tuttle

10-6-00
Date

