

# REPORTS







## Highlander Environmental Corp.

Midland, Texas

May 1, 1998

Mr. Wayne Price Environmental Engineer State of New Mexico Oil Conservation Division Energy, Minerals and Natural Resources Department 100 W. Broadway Hobbs, New Mexico 88240

## Re: Report on the Investigation of the Former Greenhill Petroleum Landfarm, Lovington Paddock / San Andres Unit, Lea County, New Mexico.

Dear Mr. Price:

The enclosed report details the findings of the above-mentioned investigation. If you have any questions or require any additional information, please advise. Thank you for your assistance in this matter.

Very truly yours,

m 1 Timothy M. Reed, REM

Timothy M. Reed, REM Vice President



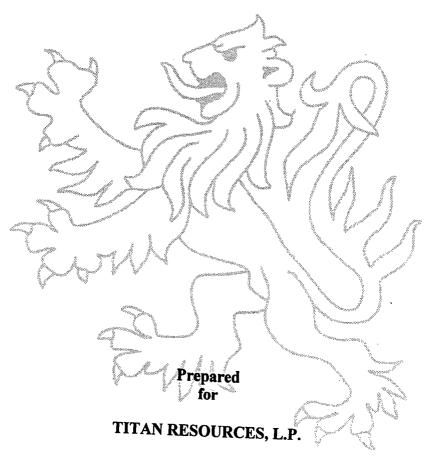
1910 N. Big Spring

(915) 682-4559

# INVESTIGATION OF FORMER GREENHILL PETROLEUM LANDFARM

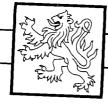
## LOVINGTON PADDOCK / SAN ANDRES UNIT

## LEA COUNTY, NEW MEXICO



April, 1998

Timothy M. Reed



Highlander Environmental Corp.

Midland, Texas



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## INVESTIGATION OF FORMER GREENHILL PETROLEUM LANDFARM LOVINGTON PADDOCK / SAN ANDRES UNIT LEA COUNTY, NEW MEXICO

Prepared For TITAN RESOURCES, L.P.

## 1.0 INTRODUCTION

The purpose of this report is to detail the findings of an investigation on a landfarm located in the Lovington Paddock / San Andres Unit in the NE/4 of Section 1, T-17-S, R-36-E, Lea County, New Mexico. This landfarm was previously installed and operated by Greenhill Petroleum. This investigation was performed for Titan Resources, L.P. (Titan).

## 2.0 BACKGROUND

Titan purchased production in the Lovington Paddock / San Andres Field in December 1997 from Pioneer Natural Resources. Pioneer had acquired this property from Greenhill Petroleum in early 1997. Conveyed along with this production was an ongoing bioremediation (landfarm) area at the Central Production Facility, which Greenhill had operated since 1994. This landfarm had been approved by the New Mexico Oil Conservation Division (NMOCD) to treat sludges and sediments from two open topped tanks and one unlined pit. The two tanks, labeled North Pit and South Pit, were being taken out of service at the Central Tank Battery. The North and South Pits were both polyethelene lined steel tanks, measuring 4' tall by 100' in diameter. The open unlined pit was designated the Getty-Walker Pit. Highlander personnel had sampled the North, South and Getty-Walker pits in 1992 and the results showed elevated lead levels of 137 mg/kg, 64 mg/kg and 32 mg/kg respectively. A copy of Highlander's original report is included in Appendix B.

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Midland, Texas 797Ø5

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On October 11, 1994, Safety and Environmental Solutions, Inc., submitted a closure request to the New Mexico Oil Conservation Division (NMOCD). However, the question of elevated lead and insufficient sampling were apparently causes for the denial of the closure request. The analysis of a composite sample for total lead had been submitted with the closure request and indicated a total lead level in composite of 37.3 mg/kg at the 3.0' depth. Toxicity Characteristic Leachate Procedure (TCLP) testing previously submitted did not indicate any leachability for the lead contained within this landfarm. Titan, upon closing the purchase of this property, retained Highlander Environmental Corp. to assist in closing this landfarm.

Highlander personnel Tim Reed and Gary Miller met with Wayne Price of the NMOCD at the site on February 27, 1998. Also present for the meeting were Ron Lechwar and Bill Hearne with Titan. At that time, it was agreed that additional profiling of the landfarm would be performed to determine if additional work and/or a risk assessment needed to be performed at this facility. It was agreed that the site would be gridded into six areas and samples taken with a backhoe at depths of 0-1.0', 3.0' and 5.0'. Additionally, samples were to be taken at a depth of 5.0' below the surface in the areas where the old tanks had been to confirm that no residual lead contamination existed.

#### 2.0 **INVESTIGATION**

On March 9, 1998, Lynn Ward with Highlander supervised the investigation of the landfarm area. The site was segregated into six areas as shown on the attached Figure 2. Discrete soil samples were taken with a backhoe at depths of 0-1.0', 3.0' and 5.0' in each of the six areas (18 samples in all). The prior location of the removed north and south pits (tanks) were ascertained and it was determined that only the north pit area was accessible. The south pit area is currently the site of a 5000-barrel storage tank. A backhoe trench was excavated in the area of the removed north pit, and samples were taken at 0-1.0', 3.0' and 5.0' below surface.

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All of the samples were placed in laboratory prepared containers and chilled to 4°C. The samples were shipped under standard Chain of Custody control to TraceAnalysis, Inc. in Lubbock, Texas. The samples were analyzed for total petroleum hydrocarbons (TPH), by EPA method 418.1, benzene, toluene, ethylbenzene and xylene (BTEX), by EPA method 8020 and total lead (Pb), by EPA SW 846-3015, 6010B.

## 3.0 <u>SAMPLE RESULTS</u>

The following table lists the analytical results for the landfarm area:

## Table 1.

Location	0-1.0'	3.0'	5.0'
	Рb 7.0	Pb 5.2	Pb <5.0
Area 1	BTEX < 0.050	BTEX < 0.050	BTEX <0.050
	TPH 11,900	ТРН 96.9	ТРН 38.5
	Pb 13.0	Pb < 5.0	Pb < 5.0
Area 2	BTEX 0.435	BTEX 1.66	BTEX < 0.050
	ТРН 21,900	TPH 14.100	ТРН 139
	Pb 15.0	Pb <5.0	Pb < 5.0
Area 3	BTEX < 0.050	BTEX < 0.050	BTEX < 0.050
	TPH 8,200	ТРН 161	ТРН 139
	Pb 15.0	Pb <5.0	Pb <5.0
Area 4	BTEX < 0.050	BTEX < 0.050	BTEX < 0.050
	ТРН 7,120	ТРН 916	ТРН 235
	Pb 22.0	Pb <5.0	Pb <5.0
Area 5	BTEX < 0.050	BTEX < 0.050	BTEX < 0.050
	TPH 16,900	TPH 121	TPH 12.5

(All results in mg/kg)



Location	0-1.0'	3.0'	5.0'
	Pb 7.6	Pb <5.0	Pb <5.0
Area 6	BTEX < 0.050	BTEX < 0.050	BTEX < 0.050
2 2	ТРН 4,240	TPH 133	TPH <10

Referring to the table, the highest total lead level found was in the 0-1.0' sample in Area 5 at 22 mg/kg. With the exception of Area 1 (5.2 mg/kg at 3.0'), no lead levels above the method detection limits were found in the deeper soils. BTEX levels were below method detection limits for all samples except the 0-1.0' and 3.0' samples in Area 2, which exhibited total BTEX levels of 0.435 and 1.66 mg/kg respectively. No benzene was detected in either sample. The total BTEX levels were well below the NMOCD recommended remedial action level (RRAL) of 50 mg/kg. TPH levels were high in the 0-1.0' samples, ranging from 4,240 mg/kg to 21,900 mg/kg, however, all samples were below 100 mg/kg in the 3.0' sample with the exception of Area 2. The TPH levels in Area 2 decreased dramatically from 14,100 mg/kg in the 3.0' sample to 139 mg/kg in the 5.0' sample. Previous reports indicate that the depth to groundwater in this area is approximately 85' below the surface. With this groundwater depth, the NMOCD guidelines specify a clean up level for TPH of 1,000 mg/kg.

The samples taken from the test trench in the area of the removed North Pit were analyzed for total lead. The samples were taken from 0-1.0', 3.0' and 5.0' below surface. The reported total lead levels were 4.2 mg/kg, <2.0 mg/kg and <2.0 mg/kg respectively, indicating no residual lead contamination of soils. Copies of the laboratory reports are included in Appendix A.

## 4.0 <u>CONCLUSIONS</u>

1. The highest total lead level found in the landfarm was in the 0-1.0' sample in Area 5 at 22 mg/kg.

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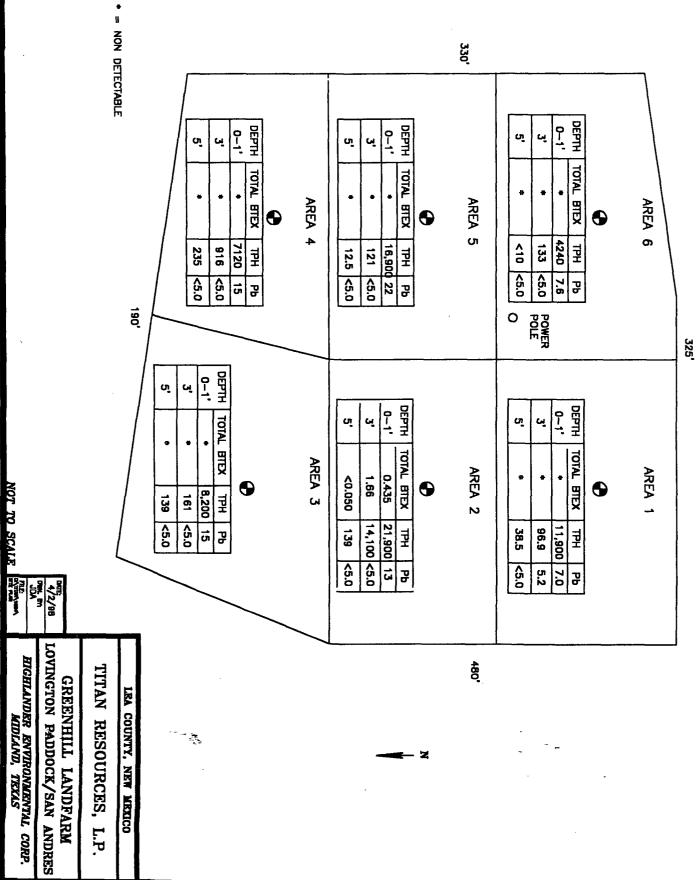
- 2. With the exception of Area 1 (5.2 mg/kg at 3.0'), no lead levels above the method detection limits were found in the deeper soils.
- 3. BTEX levels were below method detection limits for all samples except the 0-1. ' and 3.0' samples in Area 2, which exhibited total BTEX levels of 0.435 and 1.66 mg/kg respectively. No benzene was detected in either sample. These levels are well below the NMOCD RRAL level of 50 mg/kg total BTEX.
- 4. TPH levels were high in the 0-1.0' samples, ranging from 4,240 mg/kg to 21,900 mg/kg, however all samples were below 100 mg/kg in the 3.0' sample with the exception of Area 2. The TPH levels in this area did decrease dramatically from 14,100 mg/kg in the 3.0' sample to 139 mg/kg in the 5.0' sample.
- 5. Previous reports indicate that the depth to groundwater in this area is approximately 85' below the surface. With this groundwater depth, the NMOCD guidelines specify a clean up level for TPH of 1,000 mg/kg.
- 6. The samples taken from the test trench in the area of the removed North Pit were analyzed for total lead. The samples were taken from 0-1.0', 3.0' and 5.0' below surface. The reported total lead levels were 4.2 mg/kg, <2.0 mg/kg and <2.0 mg/kg respectively, indicating no residual lead contamination of soils.

## 5.0 <u>RECOMMENDATIONS</u>

- 1. The shallow surface soils across the entire landfarm should be turned to a depth of approximately 18".
- The soils in Area 2 should be turned to a depth of approximately 36" to
   42" to address in order to bring the deeper contamination to the surface for treatment.
- 3. All of the soils should be treated with a high nitrogen fertilizer and the area watered.



- 4. The soils should continue to be turned and watered on a monthly basis to promote natural attenuation of hydrocarbons.
- 5. The surface soils should be re-sampled and analyzed to total petroleum hydrocarbons (TPH) at the enc of six months of treatment to assess if further actions are necessary to close this site.



		RACEANA	ALYSIS	• INC.//	
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Proj Name: Proj Loc:	Greenhill Landfarm N/A			-	ondition: Intact and Cool eceived By: VW
TA# Fie	ld Code	MAT	RIX	TRPH (mg/b	

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		(mg/Kg)	
T93179 Area 1 @ Surface	Soil	11,900	
193180 Area 1 0 3'	Soil	96.9	
T93181 Area 1 @ 5'	Soil	38.5	
T93182 Area 2 @ Surface	Soil	21,900	
T93183 Area 2 @ 3'	Soil	14,100	
T93184 Area 2 @ 5'	Soil	139	
T93185 Area 3 @ Surface	Soil	8,200	
T93186 Area 3 @ 3'	Soil	161	
T93187 Area 3 @ 5'	Soil	139	
T93188 Area 4 @ Surface	Soil	7,120	
T93189 Area 4 @ 3'	Soil	916	
T93190 Area 4 @ 5'	Soil	235	
T93191 Area 5 @ Surface	Soil	16,900	
T93192 Area 5 @ 3'	Soil	121	
T93193 Area 5 @ 5'	Soil	12.5	
T93194 Area 6 @ Surface	Soil	4,240	
T93195 Area 6 @ 3'	Soil	133	
T93196 Area 6 @ 5'	Soil	<10.0	
Method Blank		<10.0	
Reporting Limit		10	
QC		99	

		/	KS -		3-2	3-98	
TRPHC	EPA 3550	3/18/98	EPA 418.1	3/18/98	MS	100	250
TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/Kg)
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93182 93182	- 0 0	Soil Soil				0.058 0.058	0.377 0.377	0.435 0.435 1.66	
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Field	Code	MATRIX		BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL- BENZENE (mg/Kg)	M, P, O XYLENE (mg/Kg)	TOTAL BTEX mg/Kg)	
T 93188 Area 4	@ Surface	Soil		<0.050	<0.050	<0.050	<0.050	<0.050	·
4	e 3'	Soil		<0.050	<0.050	<0.050	<0.050	<0.050	
T 93190 Area 4 (	e 5'	Soil		<0.050	<0.050	<0.050	<0.050	<0.050	
93191 Area 5		· Soil		<0.050	<0.050	<0.050	<0.050	<0.050	
93192 Area 5	e 3'	Soil		<0.050	<0.050	<0.050	<0.050	<0.050	
93193 Area 5	e 5'	Soil		<0.050	<0.050	<0.050	<0.050	<0.050	
3194 Area 6	0 Surface	Soil		<0.050	<0.050	<0.050	<0.050	<0.050	
93195 Area 6		Soil		<0.050	<0.050	<0.050	<0.050	<0.050	
93196 Area 6	e 5'	Soil		<0.050	<0.050	<0.050	<0.050	<0.050	
Method Blank				<0.050	<0.050	<0.050	<0.050		
Reporting Limit				0.05	0.05	0.05	0.05		
S				0.093	0.086	0.085	0.260		
RPD				1	0	m	m		
<pre>% Extraction Acc</pre>	Accuracy			102	95	63	97		
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TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANAL COMP	ANALYSIS CH COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: mg/Kg)	
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6701 Aberdeen Avenue, Suite 9 4725 Ripley Avenue, Suite A

Lubbock, Texas 79424 800 • 378 • 1296 El Paso, Texas 79922 888 • 588 • 3443 E-Mail: lab@traceanalysis.com 806 • 794 • 1296 915•585•3443

FAX 806 • 794 • 1298 FAX 915•585•4944

ANALYTICAL RESULTS FOR HIGHLANDER SERVICES Attention: Lynn Ward 1910 N. Big Spring St. Midland, TX 79705

**FIELD CODE** 

March 20, 1998 Receiving Date: 03/11/98 Sample Type: Soil Project No: 1084 Project Location: NA

TA#

Prep Date: 03/12/98 Analysis Date: 03/13/98 Sampling Date: 03/09/98 Sample Condition: Intact & Cool Sample Received by: VW Client Name: Titan Project Name: Greenhill Landfarm (Bio Cell)

> TOTAL Pb (mg/kg)

.,		(
T93179	Area 1 @ Surface	7.0
T93180	Area 1 @ 3'	5.2
T93181	Area 1 2 5'	<5.0
T93182	Area 2 @ Surface	13
T93183	Area 2 @ 3'	<5.0
T93184	Area 2 @ 5'	<5.0
T93185	Area 3 @ Surface	15
T93186	Area 3 @ 3'	<5.0
T93187	Area 3 @ 5'	<5.0
T93188	Area 4 @ Surface	15
T93189	Area 4 @ 3'	<5.0
T93190	Area 4 @ 5'	<5.0
T93191	Area 5 @ Surface	22
T93192	Area 5 @ 3'	<5.0
T93193	Area 5 @ 5'	<5.0
T93194	Area 6 @ Surface	7.6
T93195	Area 6 @ 3'	<5.0
T93196	Area 6 @ 5'	<5.0
ICV		1.06
CCV		1.03
Reporting Limit		5.0
RPD		3
% Extraction Accuracy	1	95
% Instrument Accurac		105
METHODS: EPA SW	846-3051, 6010B.	

CHEMIST: RR TOTAL Pb SPIKE: 200 mg/kg TOTAL Pb. TOTAL Pb CV: 1.0 mg/L TOTAL Pb.

3-20-98 DATE

Director, Dr. Blair Leftwich

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HIGHLANDER ENVIRON	Midland, Texas 7 (915) 682-4559	CLIENT NAME: Titan SITE MANAGER: C	PROJECT NO.: 1084 PROJECT NAME:	DATE TIME SAMPLE IDENTIFICATION	97181 7448 5 K area 4 (2) Sur	39/98 5 X (Dria 4/2)	5 K Que 4,	5 × Que S	5 × auc 5/	5 × aua 5 6	3 & aug 6 Con	5 × aur 6 3.	5 K ava 6	AY: (Signature) Date: 7/C 70	(Signature) Date: 2/10/47	Date	ald al

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6701 Aberdeen Avenue, Suite 9 4725 Ripley Avenue, Suite A

Lubbock, Texas 79424 800 • 378 • 1296 888•588•3443 El Paso, Texas 79922 E-Mail: lab@traceanalysis.com

806 • 794 • 1296 915•585•3443

FAX 806 • 794 • 1298 FAX 915+585+4944

ANALYTICAL RESULTS FOR **HIGHLANDER SERVICES** Attention: Lynn Ward 1910 N. Big Spring St. Midland, TX 79705

March 18, 1998 Receiving Date: 03/11/98 Sample Type: Soil Project No: 1084 Project Location: NA

Prep Date: 03/12/98 Analysis Date: 03/17/98 Sampling Date: 03/09/98 Sample Condition: Intact & Cool Sample Received by: VW Client Name: Titan Project Name: Greenhill Landfarm

TOTAL Pb

TA#	FIELD CODE	(mg/kg)
T93164	N. Pit Area @ Surface	4.2
T93165	N. Pit Area @ 3'	<2.0
T93166	N. Pit Area @ 5.0'-5.4'	<2.0
ICV		0.98
CCV		0.99
Reporting Limit		2.0
RPD		1

	•
% Extraction Accuracy	70*
% Instrument Accuracy	98

\*NOTE: Extraction Accuracy out of accepted limits of 75-125% because of matrix effects. LCS shows that the test was in range.

METHODS: EPA SW 846-3051, 6010B. CHEMIST: RR TOTAL Pb SPIKE: 200 mg/kg TOTAL Pb. TOTAL Pb CV: 1.0 mg/L TOTAL Pb.

3-18-98

Director, Dr. Blair Leftwich

DATE

s AIRBILL , 155 758 644 No RUSH Charges Authorized: Results by: (solesden) MJ9 Date: 🔒 Yes Beta eydye (AIL) 6 Time: Spec (Circle or Specify Method No.) ewweg 178 TDS, Chloride ,Hq ,22T 'aoa ANALYSIS REQUESI 809/808 Jes-T 809/0808 s.834 BY (Circled) me a gen HIGHLANDER CONTACT PERSON: 8270/625 .IoV .ims2 SNOS PAGE: \$240\8260\824 Vol. รหาวอ しょっち じってん เวช Semi Volatiles 410T SAMPLED BY. (P) HAND DELIVERED volatiles dT) J Metals Ag As Ba Cd Cr Pd Hg Se d'ICIP A. Ba Cd Cr (Pb) Hg Se SV 8V Metals X·X· RCRA ·× FEDEX 0228 н₩а нал MTBE BO20/602 STEX 8020/602 0 PRESERVATIVE METHOD X X NONE ≍ Fax (915) 682-3946 Analysis Request and Chain of Custody Record REMARKS: HIGHLANDER ENVIRONMENTAL CORP. ICE 9:00 AL Date: \_ Time: \_ EONH Date: Date: Time: Time: тэн LILLEBED (X/N) TIME NUMBER OF CONTAINERS LIM Shelton SD--Solid 0-Other Greenhill Landfürm , S. 4 RECEPTED BY (Stradyle) SITE MANAGER: LYNN WARA RECEIVED BY: (Signature) RECEIVED BY: (Signature, DATE: 3-11-98 A-Air SL-Slud**g**e 5.0 × N. P.+ Ara ( Surface 1910 N. Big Spring St. SAMPLE IDENTIFICATION Midland, Texas 79705 si X N. P. I Area @ W-Water S-Soil X N. P. t Are a WATRIX: 2 ZIP: PROJECT NAME: Date: = Time: \_\_\_\_ Date: Time: Dale: Line: **BARD** PHONE сожь STATE: 45 3498 3:30 S 93164/3498/2:45B 66 319983:505 SAMPLE CONDITION WHEN RECEIVED. XIATAM T. trini RELINGUISHED BY (Signature) TIME RELINGUISHED BY Compature RELINQUISHED BY: (Signature) (915) 682-4559 PROJECT NO. 1084 RECEIVING LABORATORY: ADDRESS: DATE CLIENT NAME: LAB I.D. NUMBER CONTACT: CITY:

23164-66

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## Highlander Environmental

Midland • Corpus Christi • San Angelo, Texas

September 22, 1992

Mr. Richard R. Myers Greenhill Petroleum 11490 Westheimer, Suite 200 Houston, TX 77077

**RE:** Tank Bottom Material Reclamation and Treatment, Lovington, New Mexico

Dear Mr. Myers,

This report details the findings of the Greenhill Petroleum waste disposal pit sampling performed on July 28, 1992 by Highlander Services personnel Tim Reed and Vijay Kurki. The three pits are on leases near Lovington, New Mexico, and all three pits contained B. S. & W. materials.

The North Pond and South Pond are located on one lease approximately 200 feet apart. The third pit, the Getty/Walker, is located two to three miles east of the North and South Ponds. The North and South Ponds are polyethylene-lined steel tanks 100 feet in diameter and four feet tall, open-topped but netted. The Getty/Walker is an unlined earth pit approximately 40 x 60 feet and four feet deep.

The North Pond and South Pond both had chloride and pH levels within acceptable levels. The TPH levels in these two ponds were high--596,000 mg/kg in the North Pond and 626,000 mg/kg in the South Pond.

The lead levels in the North Pond, 137 mg/kg, and in the South Pond, 64 mg/kg, are above the regulatory levels specified for landfill disposal, which is 50 mg/kg. However, the TCLP levels may be below the 5 mg/kg regulatory level. Typically, the reduction from total level to TCLP levels is anywhere from 10 to 20 times the total level. Also, the North Pond high level of 137 mg/kg may be partially due to lead in the fluid. The North Pond has more fluid than the South Pond. The lead levels may be lowered once the fluid is extracted from the pits, as discussed later in this report. All other metals tested were below detection limits. The third pit, the Getty/Walker, also had high TPH of 334,000 mg/kg with high volatile organic compounds, the organic compounds being benzene, toluene, ethylbenzene, and xylene (BTEX). Arsenic was detected at 5 mg/kg and lead at 32 mg/kg, but neither should present any problems. No other metals or semi-volatile organics were detected. As with the other two pits, the chloride and pH levels were within acceptable limits. Copies of the laboratory reports and the chain of custody are enclosed in Appendix A.

All three of the pits are open-topped, allowing rainwater to enter, and requiring that any free water be pumped into a storage tank before any method of treatment can begin. Removing free water will reduce the overall volume of material to be treated and, consequently, the cost of treatment. Pumping the free water may also reduce the pit lead level, which will be especially important in the North Pond and South Pond, which have high lead levels.

The bottom of the North Pond is a loosely packed layer of sludge about 1 1/2 feet thick and 440 cubic yards volume, with a high water content. The middle layer of the pit is free water, about 1 to 1 1/2 feet thick and about 360 cubic yards in volume. The top is a hard paraffin layer 4 to 6 inches thick with a volume of 120 cubic yards and low water content.

The South Pond contains a single sludge layer of 1 1/2 feet with a volume of about 440 cubic yards.

The Getty/Walker pit has three layers, the bottom of which was about 2 1/2 feet of loose sludge approximately 223 cubic yards volume. The middle layer is about 6 inches of free water and 44 cubic yards volume. The top paraffin layer is four inches thick and has a volume of 30 cubic yards. The estimation of these volumes is presented in Table 1.

North Tank (100 feet diameter)				
Description	Layer Thickness (average)	Volume (cubic yards)		
Top paraffin layer	5 in.	121.00		
Free water	1.25 ft.	363.00		
Bottom loose sludge	1.50 ft.	436.00		

		Table 1	
Estimated	Volume	of Sludge	Components
No	orth Tan	k (100 feet	t diameter)



2

Description	Layer Thickness (average)	Volume (cubic yards)	
Total sludge	1.5 ft.	436.00	

## South Tank (100 feet diameter)

#### Getty/Walker Pit (40 feet x 60 feet)

Description	Layer Thickness (average)	Volume (cubic yards)
Top paraffin layer	4 in.	30.00
Free water	0.5 ft.	44.00
Bottom sludge	2.5 ft.	223.00

Based on the contamination findings of these three pits, the following remedial alternatives are proposed:

- 1. Transportation of sludge from all pits to an off-site disposal
- 2. Enhanced in-situ bio-remediation with micro-organisms
- 3. In-situ bio-remediation with indigenous bacteria

1. Transportation of the sludge to an off-site disposal facility will require moving the sludge either in barrels or a viscuine lined truck to the nearest disposal facility. The nearest disposal facility is CRI, between Hobbs, New Mexico and Carlsbad, New Mexico. The estimated cost for this transportation and disposal is \$30,308, and does not include loading and unloading expenses. Another factor in considering off-site disposal is that the generator is liable for cleanup should problems occur at the disposal facility in the future. A cost estimate sheet is given in Attachment 1.

2. Enhanced in-situ bio-remediation involves adding micro-organisms and biocatalyst to the sludge while it remains in the tank. Inoculation fees for bacteria range from \$15 to \$20 per cubic yard. Enclosed in Appendix A is the Alpha West Inc. proposal concerning the cost of treating 2500 cubic yards. The actual sludge volume for three pits is about 1250 cubic yards, and based



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3

on this estimated volume, this method of treatment would cost about \$29,900. After in-situ treatment, the waste must either be landfarmed or backfilled, which results in additional cost and is explained further in the next paragraph.

3. Natural biodegradation is the most common method of treatment. After removal of the free water in the tank, the residual sludge would be treated by land farming. The sludge would be sampled for Toxicity Characteristic Leaching Procedures (TCLP) before landfarming operations began. Landfarming involves thorough blending of the top soil at the site with the sludge and added nutrients. Every 30 days the blended soil and sludge would be tilled for aeration. The nutrients are added in calculated quantities during tilling to provide favorable conditions for indigenous bacteria. While biological degradation of hydrocarbon wastes has been used extensively by the petroleum industries, it is a slower process than enhanced bioremediation.

An evaluation assessment of the history, geology and hydrology of the site is required for the implementation of a successful bioremediation design plan. The necessity and amount of nutrients added to subsurface microorganisms for in-situ remediation is dependent upon the site hydrology. Sites with low permeability, such as those with clay, may not allow a successful introduction of nutrients.

A thorough laboratory assessment of the microbiology of the site also provides indicative information as to whether natural bioremediation will be successful. Some components of this laboratory assessment are:

- \* Evaluate the presence of requisite microorganisms
- \* Assess potential toxicity to the microorganisms
- \* Evaluate nutrient requirements to enhance degradation activity
- \* Evaluate the compatibility of the site geochemistry with the nutrient solution proposed for addition.

Natural biodegradation may be used based on the results of the laboratory assessment.

If the Oil Conservation Division of Santa Fe, New Mexico will not allow land farming, then the sludge can be treated by bio-venting with the use of a bio-cell. The bio-cell would



consist of a layer of one foot thick porous soil, or top soil available at the site, laid over a plastic sheet. It is strongly recommended that drainage pipes be installed for every 20 feet of the bio-cell. For this project, the bio-cell dimensions would be 150 feet by 150 feet. Bio-venting works on the same principles as natural biodegradation, but instead of the sludge being mixed with soil, the sludge is laid out over the bio-cell. The drainage pipes would be used for sludge venting after any water present in the sludge is drained out by gravity.

The Getty/Walker pit can be treated in-situ by adding micro-organisms to enhance the bioremediation and blending of the soil, or the sludge may be moved to the North Pond for treatment. If the sludge is moved from one lease to another, the New Mexico Oil Conservation Division (OCD) has to be notified for approval. Therefore, treatment of the Getty/Walker sludge in-situ might be more favorable. A sample form for the New Mexico OCD is attached at the end of this report.

The natural biodegradation method appears to be the most cost-effective method treatment for the North Pond and South Pond tank sludge. Highlander Services Corp. recommends drainage of any free water from the pits and subsequent injection of the free water into the deep injection wells operated by Greenhill Petroleum.

If you have any further questions involving the investigation or this report, please do not hesitate to call on us at once.

HIGHLANDER ENVIRONMENTAL CORP.

Tim Reed Vice President, Environmental Services

Hydrologist





Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services 1703 West Industrial Avenue • P.O. Box 2150 • Midland, Texas 79702

Report of tests on ···	Waste	File No.	6581000
Client	Highlander Services Corp.	Corp. Report No.	78575
Delivered by	Tim keed	Report Date Date Received	8-18-92 7-29-92

Identification

Project No. 294, Greenhill Petroleum, Lovington, Tank Bottoms Sampling, North Pond, Sampled 7-28-92 @ 1145 by Tim Reed.

## REPORT OF CHEMICAL ANALYSIS

<b>D</b>	-	Date	- <b>-</b> .	
Parameters	<u>Results</u>	<u>Performed</u>	<u>Analyst</u>	<u>Test Method</u>
Chloride, mg/kg (1:1 Water Extract)	284	8-3-92	W. Jaycox	SM 4500-Cl,
pH (1:1)	6.97	8-3-92	W. Jaycox	SW846, 9040
Total Petroleum Hydrocarbons, mg/kg	596000	7-30-92	S. Stovall	EPA 418.1

\* Denotes "less than"

Copies: Highlander Services Corp. Attn: Tim Reed

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Report of tests on <sup>·</sup> Client Delivered by	Waste Highlander Services Corp. Tim Reed	File No. Report No. Report Date Date Received	6581000 78575 8-18-92 7-29-92
Identification	Project No. 294, Greenhill Pet	roleum, Lovingt	on,
	Tank Bottoms Sampling, North B	ond, Sampled 7-	28-92

@ 1145 by Tim Reed.

## REPORT OF TOTAL METALS

<u>Parameters</u>	Results <u>mg/kg</u>	Date <u>Performed</u>	<u>Analyst</u>	<u>Test Method</u>
Arsenic	* 5.0	8-11-92	G. Bunch	SW846, 7061
Barium	* 20	8-17-92	G. Bunch	SW846, 7080
Cadmium	* 2.0	8-17-92	G. Bunch	SW846, 7130
Chromium	* 4.0	8-17-92	G. Bunch	SW846, 7190
Lead	137	8-17-92	G. Bunch	SW846, 7420
Mercury	* 0.40	8-12-92	G. Bunch	SW846, 7470
Selenium	* 1.5	8-11-92	G. Bunch	SW846, 7741
Silver	* 2.5	8-17-92	G. Bunch	SW846, 7760

#### \*Denotes "less than"

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Report of tests on	Waste			File No.	6581000
Client	Highlander	Services C	Corp.	Report No.	78576
Delivered by	Tim Reed			Faport Date	8-18-92
				<b>D_te</b> Received	7-29-92

Identification Project No. 294, Greenhill Petroleum, Lovington, Tank Bottoms Sampling, South Pond, Sampled 7-28-92 @ 1230 by Tim Reed.

## REPORT OF CHEMICAL ANALYSIS

Parameters	<u>Results</u>	Date <u>Performed</u>	Analyst	<u>Test Method</u>
Chloride, mg/kg (1:1 Water Extract)	284	8-3-92	W. Jaycox	SM 4500-Cl,
pH (1:1)	6.69	8-3-92	W. Jaycox	SW846, 9040
Total Petroleum Hydrocarbons, mg/kg	626000	7-30-92	S. Stovall	EPA 418.1

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Report of tests on Client Delivered by	Waste Highlander Services Corp. Tim Reed	File No. Report No. Report Date Date Received	6581000 78576 8-18-92 7-29 92
Identification	Project No. 294, Greenhill Petrol Tank Bottoms Sampling, South Pond @ 1230 by Tim Reed.		

## REPORT OF TOTAL METALS

<u>Parameters</u>	Results _mg/kg_	Date <u>Performed</u>	<u>Analyst</u>	<u>Test Method</u>
Arsenic	* 5.0	8-11-92	G. Bunch	SW846, 7061
Barium	* 20	8-17-92	G. Bunch	SW846, 7080
Cadmium	* 2.0	8-17-92	G. Bunch	SW846, 7130
Chromium	* 4.0	8-17-92	G. Bunch	SW846, 7190
Lead	64	8-17-92	G. Bunch	SW846, 7420
Mercury	* 0.40	8-12-92	G. Bunch	SW846, 7470
Selenium	* 1.5	8-11-92	G. Bunch	SW846, 7741
Silver	* 2.5	8-17-92	G. Bunch	SW846, 7760

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Report of tests on	Waste	File No.	6581000
Client	Highlander Services Corp.	Report No.	78577
Delive ad by	Tim Reed	Report Date	8-18-92
-		Date Received	7-29-92

Project No. 294, Greenhill Petroleum, Lovington, Tank Bottoms Sampling, Getty/Walker, Sampled 7-28-92 @ 1430 by Tim Reed.

## REPORT OF CHEMICAL ANALYSIS

Parameters	<u>Results</u>	Date <u>Performed</u>	Analyst	<u>Test Method</u>
Chloride, mg/kg (1:1 Water Extract)	248	8-3-92	W. Jaycox	SM 4500-Cl,
pH (1:1)	6.41	8-3-92	W. Jaycox	SW846, 9040
Total Petroleum Hydrocarbons, mg/kg	334000	7-30-92	S. Stovall	EPA 418.1

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Report of tests on Client Delivered by	Waste Highlander Services Con Tim Reed	-p.		6581000 78577 8-18-92 d 7-29-92
Identification	Project No. 294, Greenh Tank Bottoms Sampling,			
	@ 1430 by Tim Reed.	05		
	REPORT VOLATILE ORGANI		16	
Date of Analysis	7-31-92			240
Technique Purge and		Analyst	SW846, 5030/8 R. Wright	\$240
<u>Compound</u>		Analyst	n. wnyac	<u>uq/kq</u>
Chloromethane -				* 10900
Bromomethane —				* 10900
Methylene Chlor	ide		<u> </u>	* 5430
1.1-Dichloroeth	ene			* 5430
1.1-Dichloroeth	ane			* 5430
1,2-Dichloroeth	ene (total)			* 5430
trans-1,2-Dichl	oroethene	·	<u>.                                    </u>	* 5430
1,2-Dichloroeth	ane			* 5430
1,1,1-Trichloro	ethane —————			* 5430
	oride			
Bromodichlorome	thane			* 5430
1,2-Dichloropro	pane			* 5430
trans-1,3-Dichl	oropropene			* 5430
	· · · · · · · · · · · · · · · · · · ·			
Dibromochlorome	thane			* 5430
	ethane			
cis-1,3-Dichlor	opropene			* 5430
	nylether			
Tetrachloroethe	ne loroethane			* 5430
1,1,2,2-Tetrach	loroethane			* 5430
Chlerebergers		. <u></u>		165000
*Denotes "less	than"			n 343UU

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Report of tests on . Client Delivered by	Highlander Services C	orp.	File No. Report No. Report Date Date Received	78577 8-18-92
Identification	Project No. 294, Gree Tank Bottoms Sampling @ 1145 by Tim Reed. REPOR	, Getty/Wal}		
	ORGANICS	ANALYSIS		
			je 1 of 3	
Date of Analysis	8-4-92	Method	SW846, 3550/	3270
-		Analyst		
<u>Compound</u>				ug/kg
phenol	yl)Ether phenol zene		*	280000
bis(2-chloroeth	shopol		<del>π</del>	280000
2-Chiorophenoi			<b>*</b>	280000
1,3-Dichloroben			×	280000
	zene			
2-Mothylphonol			*	280000
bis(2-Chloroiso	propyl)Ether		×	280000
A-Methylphenol			×	280000
N-Nitroso-Di-n-	Propylamine		*	280000
Hexachloroethan			*	280000
2-Nitrophenol -			*	280000
2,4-Dimethylphe	nol		*	280000
Benzoic Acid			*	1360000
bis(2-Chloroeth	oxy)Methane		*	280000
2,4-Dichlorophe	nol	·····	*	280000
	benzene ————			
Naphthalene			*	280000
4-Chloroaniline			*	280000
Hexachlorobutad	iene ylphenol		*	280000
4-Chloro-3-Meth	ylphenol	•	*	280000
2-Methylnaphtha	lene		*	280000
Hexachlorocyclo	pentadiene —		*	280000
2,4,6-Trichloro	phenol		*	280000
2,4,5-Trichloro	phenol ——————		*	280000
2-Chloronaphtha	lene		*	280000
2,Nitroaniline			*	1360000
*Denotes "less	than"			

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Report of tests on Client Delivered by	Waste Highlander So Tim Reed	ervices	Corp.	••	File No. Report No. Report Date	6581000 78577 8-18-92
					Date Received	7-29-92

Identification

Project No. 294, Greenhill Petroleum, Lovington, Tank Bottoms Sampling, Getty/Walker, Sampled 7-28-92 @ 1145 by Tim Reed.

> REPORT OF ORGANICS ANALYSIS

Page 2 of 3

Compound         Dimethyl Phthalate         Acenaphthylene         2,6-Dinitrotoluene         3-Nitroaniline         Acenaphthene         2,4-Dinitrophenol         4-Nitrophenol         0         2,4-Dinitrotoluene         0         10         2,4-Dinitrophenol	* 280000 * 280000 * 1360000 * 280000 * 1360000 * 280000 * 280000 * 280000 * 280000 * 280000 * 280000 * 280000 * 1360000 * 280000 * 280000 * 280000
2.4-Dinitrotoluene	* 280000
Diethyl Phthalate	* 280000
4-Chlorophenyl-phenylether	* 280000
Fluorene	* 280000
4-Nitroaniline	*1360000
4.6-Dinitro-2-Methylphenol	*1360000
N-Nitrosodiphenylamine (1)	* 280000
4-Bromophenyl-phenylether	* 280000
Hexachlorobenzene	* 280000
Pentachlorophenol	
Phenanthrene	- * 280000
Anthracene	* 280000
Di-n-Butylphthalate	
Fluoranthene ———————————————————————————————————	- * 280000
Pyrene	* * 280000
Butylbenzylphthalate	* * 280000
3,3'-Dichlorobenzidine	- * 561000
Benzo(a)Anthracene	* 280000
Chrysene	- <b>*</b> 280000
bis(2-Ethylhexyl)Phthalate	

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Report of tests on	Waste	File No.	6581000
Client	Highlander Services Corp.	Report No.	78577
Delivered by	Tim Reed	Report Date	8-18-92
-		Date Received	1-29-92

Identification

Project No. 294, Greenhill Petroleum, Lovington, Tank Bottoms Sampling, Getty/Walker, Sampled 7-28-92 @ 1145 by Tim Reed.

## REPORT OF ORGANICS ANALYSIS

Page 3 of 3

Compound	ug/kg
Di-n-Octyl Phthalate	- * 280000
Benzo(b)Fluoranthene	- * 280000
Benzo(k) Fluoranthene	- * 280000
Benzo(a)Pyrene	
Indeno(1,2,3-cd)Pyrene	- * 280000
Dibenz(a,h)Anthracene	- * 280000
Benzo(g,h,i)Perylene	- * 280000

\* Denotes "less than"

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Report of tests on Client Delive ad by	Waste Highlander Services Corp. Tim Reed	File No. Report No. Report Date Date Received	6581000 78577 8-18-92 7-29-92
Identification	Project No. 294, Greenhill Pet: Tank Bottoms Sampling, Getty/W		

@ 1430 by Tim Reed.

## REPORT OF TOTAL METALS

<u>Parameters</u>	Results mg/kg_	Date <u>Performed</u>	Analyst	Test Method
Arsenic	5.0	8-11-92	G. Bunch	SW846, 7061
Barium	* 20	8-17-92	G. Bunch	SW846, 7080
Cadmium	* 2.0	8-17-92	G. Bunch	SW846, 7130
Chromium	* 4.0	8-17-92	G. Bunch	SW846, 7190
Lead	32	8-17-92	G. Bunch	SW846, 7420
Mercury	* 0.40	8-12-92	G. Bunch	SW846, 7470
Selenium	* 1.5	8-11-92	G. Bunch	SW846, 7741
Silver	* 2.5	8-17-92	G. Bunch	SW846, 7760

## \*Denotes "less than"

Copies: Highlander Services Corp. Attn: Tim Reed

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