

3R - 397

**GENERAL
CORRESPONDENCE**

YEAR(S):
2003

May 1, 2003

Mr. Roger Anderson
New Mexico Oil Conservation Division
1220 St. Francis Street
Santa Fe, NM 87505

3R-397

Dear Mr. Anderson:

On February 12, 2003 El Paso Field Services Co. (EPFS) submitted to the Oil Conservation Division (OCD) an environmental investigation plan (Plan) to sample the Hampton Arroyo immediately south of the Sunland Construction Company yard in Aztec, New Mexico (the Yard). As you may recall, the Yard was formerly owned by EPFS and was the district maintenance yard for the Aztec Pipeline District. The Plan was designed to detect contamination that may have been released into the environment due to operations in the Yard.

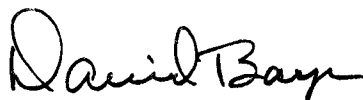
The Plan contained proposed sampling locations and specified the laboratory tests that would be performed. Once the Plan was approved by the OCD, EPFS contracted with Terracon, Inc. to collect samples and forward them to Pinnacle Laboratories in Albuquerque for analysis. The results of those analyses are attached.

None of the samples contained a measurable level of mercury. These results support EPFS' belief that it did not dispose of any mercury-containing waste in or near the arroyo. The sample nearest to the old wash rack drain line did contain 670 parts per million Total Petroleum Hydrocarbons (TPH) at the surface. The other samples contained lesser amounts of TPH, as shown on the laboratory report.

The Hampton Arroyo is used year-round to transfer water to various parts of the county-wide irrigation water distribution system. Since the arroyo does flow almost continuously, EPFS believes that leaving these low levels of TPH in place would be less detrimental to the environment than any attempt to remove the hydrocarbons. Excavation within the arroyo would disrupt the water distribution system and would cause the release of very high levels of suspended solids into the stream.

If you have any questions or further concerns about this matter, please call me at (505) 599-2256.

Sincerely yours,

A handwritten signature in cursive script that reads "David Bays".

David Bays, REM
Principal Environmental Scientist

cc: Mr. Denny Foust – NMOCD – Aztec, NM

PINNACLE
LABORATORIES

2709-D Pan American Freeway NE
Albuquerque, New Mexico 87107
Phone (505) 344-3777
Fax (505) 344-4413

Pinnacle Lab ID number **304036**
April 23, 2003

TERRACON
#4A CR 3499
FLORA VISTA, NM 87415

EL PASO FIELD SERVICES
614 REILLY AVE
FARMINGTON, NM 87401

Project Name AZTEC PIPE YARD
Project Number 66037606

Attention: ROBERT THOMPSON/DAVID BAYS

On 04/05/03 Pinnacle Laboratories, Inc., (ADHS License No. AZ0643 pending), received a request to analyze **non-aq** samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

EPA method 8015 analyses were performed by Pinnacle Laboratories, Inc. Albuquerque, NM.

All remaining analyses were performed by Severn Trent Laboratories, Inc. Pensacola, FL.

If you have any questions or comments, please do not hesitate to contact us at (505)344-3777.



H. Mitchell Rubenstein, Ph. D.
General Manager

MR: jt

Enclosure

PINNACLE
LABORATORIES

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Albuquerque, New Mexico 87107
Phone (505) 344-3777
Fax (505) 344-4413

CLIENT	: TERRACON	PINNACLE ID	: 304036
PROJECT #	: 66037606	DATE RECEIVED	: 04/05/03
PROJECT NAME	: AZTEC PIPE YARD	REPORT DATE	: 04/23/03

PINNACLE ID #	CLIENT DESCRIPTION	MATRIX	DATE COLLECTED
304036 - 01	1-A	NON-AQ	04/04/03
304036 - 02	1-B	NON-AQ	04/04/03
304036 - 03	2-A	NON-AQ	04/04/03
304036 - 04	2-B	NON-AQ	04/04/03
304036 - 05	3-A	NON-AQ	04/04/03
304036 - 06	3-B	NON-AQ	04/04/03

PINNACLE
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GAS CHROMATOGRAPHY RESULTS

TEST : EPA 8015 MODIFIED (DIRECT INJECT)
CLIENT : TERRACON
PROJECT # : 66037606
PROJECT NAME : AZTEC PIPE YARD

PINNACLE I.D.: 304036

SAMPLE			DATE	DATE	DATE	DIL.
ID. #	CLIENT I.D.	MATRIX	SAMPLED	EXTRACTED	ANALYZED	FACTOR
01	1-A	NON-AQ	04/04/03	04/11/03	04/17/03	1
02	1-B	NON-AQ	04/04/03	04/11/03	04/16/03	1
03	2-A	NON-AQ	04/04/03	04/11/03	04/16/03	1
PARAMETER		DET. LIMIT	UNITS	1-A	1-B	2-A
FUEL HYDROCARBONS, C7-C10		10	MG/KG	< 10	< 10	< 10
FUEL HYDROCARBONS, C10-C22		10	MG/KG	250	59	11
FUEL HYDROCARBONS, C22-C36		10	MG/KG	420	82	21
CALCULATED SUM:				670	141	32
SURROGATE:						
O-TERPHENYL (%)				103	99	108
SURROGATE LIMITS		(70-130)				

CHEMIST NOTES:
N/A

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GAS CHROMATOGRAPHY RESULTS

TEST : EPA 8015 MODIFIED (DIRECT INJECT)
CLIENT : TERRACON
PROJECT # : 66037606
PROJECT NAME : AZTEC PIPE YARD

PINNACLE I.D.: 304036

SAMPLE			DATE	DATE	DATE	DIL.
ID. #	CLIENT I.D.	MATRIX	SAMPLED	EXTRACTED	ANALYZED	FACTOR
04	2-B	NON-AQ	04/04/03	04/11/03	04/16/03	1
05	3-A	NON-AQ	04/04/03	04/11/03	04/16/03	1
06	3-B	NON-AQ	04/04/03	04/11/03	04/16/03	1

PARAMETER	DET. LIMIT	UNITS	2-B	3-A	3-B
FUEL HYDROCARBONS, C7-C10	10	MG/KG	< 10	< 10	< 10
FUEL HYDROCARBONS, C10-C22	10	MG/KG	15	28	40
FUEL HYDROCARBONS, C22-C36	10	MG/KG	27	46	81
CALCULATED SUM:			42	74	121

SURROGATE:
O-TERPHENYL (%) 111 112 115
SURROGATE LIMITS (70-130)

CHEMIST NOTES:
N/A

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GAS CHROMATOGRAPHY RESULTS
REAGENT BLANK

TEST	: EPA 8015 MODIFIED (DIRECT INJECT)	PINNACLE I.D.	: 304036
BLANK I.D.	: 041103	DATE EXTRACTED	: 04/11/03
CLIENT	: TERRACON	DATE ANALYZED	: 04/16/03
PROJECT #	: 66037606	SAMPLE MATRIX	: NON-AQ
PROJECT NAME	: AZTEC PIPE YARD		

PARAMETER	UNITS	
FUEL HYDROCARBONS, C7-C10	MG/KG	< 10
FUEL HYDROCARBONS, C10-C22	MG/KG	< 10
FUEL HYDROCARBONS, C22-C36	MG/KG	< 10

SURROGATE:
O-TERPHENYL (%) 107
SURROGATE LIMITS (70-130)

CHEMIST NOTES:
N/A

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GAS CHROMATOGRAPHY RESULTS
REAGENT BLANK

TEST	: EPA 8015 MODIFIED (DIRECT INJECT)	PINNACLE I.D.	: 304036
BLANK I.D.	: 041103	DATE EXTRACTED	: 04/11/03
CLIENT	: TERRACON	DATE ANALYZED	: 04/14/03
PROJECT #	: 66037606	SAMPLE MATRIX	: NON-AQ
PROJECT NAME	: AZTEC PIPE YARD		

PARAMETER	UNITS	
FUEL HYDROCARBONS, C7-C10	MG/KG	< 10
FUEL HYDROCARBONS, C10-C22	MG/KG	< 10
FUEL HYDROCARBONS, C22-C36	MG/KG	< 10

SURROGATE:
O-TERPHENYL (%) 103
SURROGATE LIMITS (70-130)

CHEMIST NOTES:
N/A

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GAS CHROMATOGRAPHY QUALITY CONTROL
LCS/LCSD

TEST	: EPA 8015 MODIFIED (DIRECT INJECT)	PINNACLE I.D.	: 304036
BATCH #	: 041103	DATE EXTRACTED	: 04/11/03
CLIENT	: TERRACON	DATE ANALYZED	: 04/16/03
PROJECT #	: 66037606	SAMPLE MATRIX	: NON-AQ
PROJECT NAME	: AZTEC PIPE YARD	UNITS	: MG/KG

PARAMETER	SAMPLE RESULT	CONC SPIKE	SPIKED SAMPLE	% REC	DUP SPIKE	DUP % REC	RPD	REC LIMITS	RPD LIMITS
FUEL HYDROCARBONS	<10	200	219	110	234	117	6	(75-125)	20

CHEMIST NOTES:
N/A

% Recovery = $\frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$

RPD (Relative Percent Difference) = $\frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$

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GAS CHROMATOGRAPHY QUALITY CONTROL
LCS/LCSD

TEST	: EPA 8015 MODIFIED (DIRECT INJECT)	PINNACLE I.D.	: 304036
BATCH #	: 041103	DATE EXTRACTED	: 04/11/03
CLIENT	: TERRACON	DATE ANALYZED	: 04/14/03
PROJECT #	: 66037606	SAMPLE MATRIX	: NON-AQ
PROJECT NAME	: AZTEC PIPE YARD	UNITS	: MG/KG

PARAMETER	SAMPLE RESULT	CONC SPIKE	SPIKED SAMPLE	% REC	DUP SPIKE	DUP % REC	RPD	REC LIMITS	RPD LIMITS
FUEL HYDROCARBONS	<10	200	188	94	210	105	11	(75-125)	20

CHEMIST NOTES:
N/A

% Recovery =
$$\frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

RPD (Relative Percent Difference) =
$$\frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$

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GAS CHROMATOGRAPHY QUALITY CONTROL
MSMSD

TEST	: EPA 8015 MODIFIED (DIRECT INJECT)	PINNACLE I.D.	: 304036
MSMSD #	: 304074-01	DATE EXTRACTED	: 04/11/03
CLIENT	: TERRACON	DATE ANALYZED	: 4/14/03 *
PROJECT #	: 66037606	SAMPLE MATRIX	: NON-AQ
PROJECT NAME	: AZTEC PIPE YARD	UNITS	: MG/KG

PARAMETER	SAMPLE RESULT	CONC SPIKE	SPIKED SAMPLE	% REC	DUP SPIKE	DUP % REC	RPD	REC LIMITS	RPD LIMITS
FUEL HYDROCARBONS	172	200	373	100	386	107	3	(75-125)	20

CHEMIST NOTES:

* MSD analyzed on 04/15/03

$$\% \text{ Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$

LOG NO: C3-04200
 Received: 08 APR 03
 Reported: 17 APR 03

Ms. Jacinta Tenorio
 Pinnacle Laboratories
 2709-D Pan American Freeway Northeast
 Albuquerque, NM 87107

Cl Project No: 304036

Project: TERR- AZTEC PIPE YARD
 Sampled By: Client
 Code: 090430417

REPORT OF RESULTS

Page 1

LOG NO	SAMPLE DESCRIPTION , SOLID OR SEMISOLID SAMPLES	DATE/ TIME SAMPLED			
04200-1	1-A/304036-01	04-04-03/10:35			
04200-2	1-B/304036-02	04-04-03/10:35			
04200-3	2-A/304036-03	04-04-03/10:36			
04200-4	2-B/304036-04	04-04-03/10:36			
04200-5	3-A/304036-05	04-04-03/10:36			
PARAMETER	04200-1	04200-2	04200-3	04200-4	04200-5
Mercury (TCLP) (7470A), mg/l	<0.0020	<0.0020	<0.0020	<0.0020	<0.0020
Dilution Factor	10	10	10	10	10
Prep Date	04.14.03	04.14.03	04.14.03	04.14.03	04.14.03
Analysis Date	04.15.03	04.15.03	04.15.03	04.15.03	04.15.03
Batch ID	HGW035	HGW035	HGW035	HGW035	HGW035
Prep Method	7470A	7470A	7470A	7470A	7470A
Analyst	JDE	JDE	JDE	JDE	JDE

LOG NO: C3-04200
Received: 08 APR 03
Reported: 17 APR 03Ms. Jacinta Tenorio
Pinnacle Laboratories
2709-D Pan American Freeway Northeast
Albuquerque, NM 87107

C1 Project No: 304036

Project: TERR- AZTEC PIPE YARD
Sampled By: Client
Code: 090430417
Page 2

REPORT OF RESULTS

LOG NO	SAMPLE DESCRIPTION , SOLID OR SEMISOLID SAMPLES	DATE/ TIME SAMPLED
04200-6	3-B/304036-06	04-04-03/10:36
PARAMETER	04200-6	
Mercury (TCLP) (7470A), mg/l	<0.0020	
Dilution Factor	10	
Prep Date	04.14.03	
Analysis Date	04.15.03	
Batch ID	HGW035	
Prep Method	7470A	
Analyst	JDE	

LOG NO: C3-04200
Received: 08 APR 03
Reported: 17 APR 03

Ms. Jacinta Tenorio
Pinnacle Laboratories
2709-D Pan American Freeway Northeast
Albuquerque, NM 87107

Cl Project No: 304036

Project: TERR- AZTEC PIPE YARD
Sampled By: Client
Code: 090430417
Page 3

REPORT OF RESULTS

LOG NO	SAMPLE DESCRIPTION , QC REPORT FOR SOLID/SEMISOLID	DATE/	TIME SAMPLED	
04200-7	Method Blank			
04200-8	Lab Control Standard % Recovery			
04200-9	Matrix Spike % Recovery			
04200-10	Matrix Spike Duplicate % Recovery			
PARAMETER	04200-7	04200-8	04200-9	04200-10
Mercury (TCLP) (7470A), mg/l	<0.0020	99 %	100 %	98 %
Dilution Factor	10	---	---	---
Prep Date	04.14.03	---	---	---
Analysis Date	04.15.03	---	---	---
Batch ID	HGW035	HGW035	HGW035	HGW035
Prep Method	7470A	7470A	7470A	7470A
Analyst	JDE	---	---	---

These test results meet all the requirements of NELAC. All questions regarding this test report should be directed to the STL Project Manager who signed this test report.

See the Project Sample Inspection Form (PSIF) to determine if a sample was received that did not meet EPA requirements for sample collection, preservation, or holding time.


Lance Larson, Project Manager

Final Page Of Report

STL Pensacola Data Qualifiers for Final Report

B	The analyte was detected in the associated method blank and in the client's sample.
C	The compound has been quantitated against a one point calibration.
D	Recovery is not calculable due to dilution.
E	Estimated value because the analyte concentration exceeds the upper calibration range of the instrument or method.
I	Estimated value because the analyte concentration is less than the lower calibration range of the instrument but is at the method detection limit or greater than the method detection limit.
H	Sample and/or duplicate is below 5 X (times) the STL Reporting Limit and the absolute difference between the results exceeds the STL Reporting Limit.
J1	A sample surrogate or an LCS target compound recovered above the upper control limit (UCL). Compounds qualified with a J1 may be biased high.
J2	A sample surrogate or an LCS target compound recovered outside the lower control limit (LCL). Compounds qualified with a J2 may be biased low.
M1	A matrix effect was present.
M2	The MS and/or MSD %R or RPD was outside upper or lower control limits; not necessarily due to matrix effect.
N/C	Not Calculable; Sample spiked is > 4X spike concentration (may use this flag in place of negative numbers).
R1	Internal standard area exceeds the acceptance criteria
R2	Calibration verification exceeds the acceptance criteria.
S1	The Method of Standard Additions (MSA) has been performed on this sample.
T	Second-column or detector confirmation exceeded the SW-846 criteria of 40% RPD for this compound.
TIC	The compound is not included in the initial calibration curve. It is searched for qualitatively or as a Tentatively Identified Compound.
U or <	The analyte was not detected at or above the MDL or the RL, whichever is entered next to the "U" or "<"
W	Post-digestion spike for Furnace AA is out of control limits (85-115%), while sample absorbance is less than 50% spike absorbance.

It is permissible to submit an Out-of-Control Events/Corrective Action form and/or Case Narrative in lieu of using above qualifiers.

When the laboratory receives a sample that does not meet EPA requirements for sample collection, preservation or holding time, the laboratory is required to reject the samples. The client must be notified and asked whether the lab should proceed with analysis. Data from any samples that do not meet sample acceptance criteria (collection, preservation and holding time), must be flagged, or noted on a corrective action form or case narrative, or addressed on the Project Sample Inspection Form (PSIF) in an unambiguous manner clearly defining the nature and substance of the variation. NPDES samples from North Carolina that do not meet EPA requirements for sample collection, preservation or holding time are non-reportable for NPDES compliance monitoring.

Abbreviations

ND	Not Detected at or above the STL Pensacola reporting limit (RL)
NS	Not Submitted
NA	Not Applicable
MDL	STL Pensacola Method Detection Limit
RL	STL Pensacola Reporting Limit
NoMS	Not enough sample provided to prepare and/or analyze a method-required matrix spike (MS) and/or duplicate (MSD)

Florida Projects Inorganic/Organic

Refer to FL DEP 62-160.700(7); Table 7 Data Qualifier Codes. FL DEP Rule 62-160.670(1)(h) states that laboratories shall include the analytical result for each analysis with applicable data qualifiers. FL DEP Rule 62-160.700(7), Table 7 lists the FL DEP data qualifiers. FL DEP Rule 62-160.700(3), Table 3 lists the Florida sites which require data qualifiers.

AFCEE QAPP Projects

Refer to AFCEE QAPP for appropriate data qualifiers (AFCEE QAPP Version will be specified by client for the project).

Arizona DEQ Projects

Any qualified data submitted to Arizona DEQ (ADEQ) after January 1, 2001 must be designated using the Arizona Data Qualifiers as developed by the Arizona ELAC technical subcommittee. Refer to the ADEQ qualifier list.

CLP and CLP-like Projects

Refer to referenced CLP Statement of Work (SOW) for explanation of data qualifiers. CLP SOW to be followed must be specified to client.

STL Pensacola
PROJECT SAMPLE INSPECTION FORM

SEVERN
TRENT

STL

Lab Order #: C304200

Date Received: 4/8/63

1. Was there a Chain of Custody? ☒ Yes ☐ No*
2. Was Chain of Custody properly filled out and relinquished? ☒ Yes ☐ No*
3. Were all samples properly labeled and identified? ☒ Yes ☐ No*
4. Were samples received cold? ☒ Yes ☐ No* N/A
(Criteria: 2° - 6°C: STL-SOP 1055)
5. Did samples require splitting or compositing*? ☐ Yes* ☒ No
6. Were samples received in proper containers for analysis requested? ☒ Yes ☐ No*
7. Were all sample containers received intact? ☒ Yes ☐ No*

8. Were samples checked for preservative? *(Check pH of all H₂O requiring preservative (STL-PN SOP 917) except VOA vials that require zero headspace)** Yes ☐ No* ☒ N/A
9. Is there sufficient volume for analysis requested? ☒ Yes ☐ No* ☒ N/A (Can)
10. Were samples received within Holding Time? *(REFER TO STL-SOP 1040)* ☒ Yes ☐ No*
11. Is Headspace visible > 1/4" in diameter in VOA vials?* ☐ Yes* ☐ No ☒ N/A
12. Were Trip Blanks Received? ☐ Yes ☐ No ☒ N/A
13. If sent, were matrix spike bottles returned? ☐ Yes ☐ No* ☒ N/A
14. If sent, were T-Handles returned? ☐ Yes ☐ No* ☒ N/A
15. If any issues, how was PM notified? PSIF ☐ Verbal ☐

Airbill Number(s): 12878168 014314 6563

Shipped By: ☒ UPS ☐ FedX ☐ HD ☐ BUS ☐ ABX
(HD - Hand Delivery)

Cooler Numbers & Temp(s) (°C): Chest 2° cool
(IE. 340L-4°C-CCK8 -- LIST THERMOMETER NUMBER FOR VERIFICATION)

Out of Control Events and Inspection Comments (list sample IDs/Tests where appropriate):

- 1-3. COC/Sample ID/COC discrepancy: _____
4. Insufficient Ice ☐ Delay in delivery ☐ Other ☐ _____
5. Samples were Split ☐ Composited ☐ Requested by: Client ☐ PM ☐ Other: _____
6. Improper Containers (ID/Size/desc): _____
7. Broken bottles/Test: _____
8. Incorrect pH: _____
9. Test/Matrix/Volume: _____
10. Out of Holding Time/Test: _____
11. VOA headspace > 1/4" (list ~ size) _____
- List additional comments by above number: _____

(USE BACK OF PSIF FOR ADDITIONAL NOTES AND COMMENTS)

Inspected By: MHS Date: 4/8/63

Logged By: MHS Date: 4/8/63

- * Note all Out-of-Control and/or questionable events on Comment Section of this form. For holding times, the analytical department will flag immediate hold time samples (pH, Dissolved O₂, Residual Cl) as out of hold time, therefore, these samples will not be documented on this PSIF.
- * All volatile samples requested to be split or composited must be done in the Volatile Lab. Document: "Volatile sample values may be compromised due to sample splitting (compositing)"
- * All pH results for North Carolina, New York, and other requested samples are to be recorded on the pH log provided (STL-SOP 938).
- * According to EPA, 1/4" of headspace is acceptable in 40 ml vials requiring volatile analysis.

[illegible]

PROJECT INFORMATION		SAMPLE RECEIPT		SAMPLES SENT TO:		RELINQUISHED BY:		1.		RELINQUISHED BY:		2.	
PROJECT #: 304036		Total Number of Containers		PENSACOLA - STL-FL		Signature:		Time:		Signature:		Time:	
PROJ. NAME: TERK		Chain of Custody Seals		ESL - OR		Francine Trivido		1700					
QC LEVEL: STD IV		Received Intact?		ATEL - AZ		Printed Name:		Date:		Printed Name:		Date:	
QC REQUIRED: MS MSD BLANK		Received Good Cond./Cold		ATEL - MARION		Francine Trivido		4/7/03					
TAT: STANDARD RUSH!!		LAB NUMBER:		ATEL - MELMORE		Pinnacle Laboratories, Inc.				Company			
				EHL		RECEIVED BY:		1.		RECEIVED BY:		2.	
DUE DATE: 4/21		COMMENTS:		GEL		Signature:		Time:		Signature:		Time:	
RUSH SURCHARGE: —				U OF MIAMI		Mark Swafford		1010					
CLIENT DISCOUNT: —				WCAS		Printed Name:		Date:		Printed Name:		Date:	
SPECIAL CERTIFICATION				WOHL				4/8/03					
REQUIRED: YES NO						Company		STARS		Company			

SHADED AREAS ARE FOR LAB USE ONLY.

PLEASE FILL THIS FORM IN COMPLETELY.

[illegible]

PROJECT INFORMATION		PRIOR AUTHORIZATION IS REQUIRED FOR RUSH PROJECTS		RELINQUISHED BY: 1.		RELINQUISHED BY: 2.	
PROJ. NO.: 66037606		(RUSH) <input type="checkbox"/> 24hr <input type="checkbox"/> 48hr <input type="checkbox"/> 72hr <input type="checkbox"/> 1 WEEK (NORMAL) <input checked="" type="checkbox"/>		Signature: Mike Hare 10/4/5		Signature: [Signature] 12/4/5	
PROJ. NAME: AZTEC PIPE YARD		CERTIFICATION REQUIRED <input type="checkbox"/> NM <input type="checkbox"/> SDWA <input type="checkbox"/> OTHER		Printed Name: Mike Hare 4-4-03		Printed Name: [Signature] 04/04/03	
P.O. NO.:		METHANOL PRESERVATION <input type="checkbox"/>		Company: Terracon		Company: [Signature]	
SHIPPED VIA: GREYHOUND		COMMENTS: FIXED FEE <input type="checkbox"/>		RECEIVED BY: 1.		RECEIVED BY: (LAB) 2.	
SAMPLE RECEIPT		PROVIDE RESULTS TO TERRACON		Signature: [Signature]		Signature: [Signature]	
NO CONTAINERS 12		AND DAVID BAYS AT EPFS:		Time: [Signature]		Time: [Signature]	
CUSTODY SEALS V/N/N		EPFS		Printed Name: [Signature]		Printed Name: [Signature]	
RECEIVED INTACT Y		614 REILLY AVE.		Date: [Signature]		Date: [Signature]	
BLUE ICE (P) 6.0		FARMINGTON, NM 87401		Company: [Signature]		Company: [Signature]	
						Pinnacle Laboratories Inc.	



February 12, 2003

Mr. Roger Anderson
New Mexico Oil Conservation Division
1220 St. Francis Street
Santa Fe, NM 87505

Dear Mr. Anderson:

On January 6, 2003 the Earthjustice Legal Defense Fund of Denver, Colorado, on behalf of Ms. Tweeti Blancett, filed a Citizen's Petition with the US EPA Region 6 requesting that El Paso Field Services Co. (EPFS) conduct investigations at four sites owned or formerly owned by EPFS. Based on visits to those four sites by Mr. Bill Olson and Mr. Ed Martin of the NMOCD, Mr. Ron Sipe of EPFS, and I, NMOCD has requested EPFS to collect samples from the Hampton Arroyo located adjacent to the Sunland Construction Company yard in Aztec, NM. This construction yard was formerly owned by EPFS.

EPFS is hereby submitting for your approval a proposed sampling plan for the arroyo. If you need any additional information to facilitate your review of the sampling plan, please call me at (505) 599-2256.

Sincerely yours,

A handwritten signature in dark ink that reads "David Bays". The signature is written in a cursive, flowing style.

David Bays, REM
Principal Environmental Scientist

**El Paso Field Services Company
Sampling Plan for the Sunland Construction Co. Yard
(Formerly EPFS Aztec Pipeline Yard)**

Prior to state and federal regulation of industrial wastewater discharge, the El Paso Natural Gas Company ("EPNG") Aztec District Pipeline Yard was equipped with a truck wash rack which discharged into the Hampton Arroyo. That arroyo flows east to west along the south edge of the site boundary. The wash rack discharged into the arroyo through an 8 inch diameter steel pipe.

In approximately 1987 EPNG stopped using the wash rack and filled the wash rack sump with concrete to prevent any accidental discharge.

In January 1996 EPNG sold the Aztec Pipeline Yard to El Paso Field Services Co ("EPFS"). EPFS in turn sold the site to Sunland Construction Company in December 1997.

In response to verbal a request by the New Mexico Oil Conservation Division, EPFS is proposing to conduct the following sampling within the Hampton Arroyo:

Using the services of a third party contractor, collect a total of six (6) soil samples from three (3) locations within the arroyo (see attached diagram). All samples will be collected by using a hand auger. Sample Point #1 will be below the wash rack drain line and 4 inches down stream, sample Point #2 will be 2 feet downstream from the center of the drain line, and Sample Point #3 will be 10 feet downstream from the center of the drain line.

- | | |
|-----------|---|
| Sample 1A | A composite of soils from the surface through 2 inches deep. |
| Sample 1B | A composite of soils from 8 inches deep through 12 inches deep. |
| Sample 2A | A composite of soils from the surface through 2 inches deep. |
| Sample 2B | A composite of soils from 8 inches deep through 12 inches deep. |
| Sample 3A | A composite of soils from the surface through 2 inches deep. |
| Sample 3B | A composite of soils from 8 inches deep through 12 inches deep. |

The samples will be submitted to a contract laboratory and analyzed for Total Petroleum Hydrocarbons and Mercury.

Sample results, along with copies of the laboratory Quality Assurance / Quality Control data and chain of custody documentation will be submitted to NMOCD upon receipt from the laboratory.

Sunland Construction Co.
(Former El Paso Field Services Co. Aztec Pipeline Yard)
816 Aztec Blvd. NE
Aztec, NM 87410



Proposed Sample Points:

- #1 - Below and 4 inches downstream from the center of the drainline
- #2 - 2 feet downstream from the center of the drainline
- #3 - 10 Feet downstream from the center of the drainline

