

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON Governor Joanna Prukop Cabinet Secretary Lori Wrotenbery Director Oil Conservation Division

1/20/04

January 13, 2004

Mr. Paul Mulkey <u>pdmulkey@duke-energy.com</u> Duke Energy Field Services

Re: Plan Approval, G-Extension-3 111903 (Site1) Site Reference UL-J, Sec-31 T-21S R-36E Initial C-141 Dated: 12-19-03 Request Plan Dated: 12-19-03

Dear Mr. Mulkey,

The Remediation Work Plan Proposal submitted to the New Mexico Oil Conservation Division (OCD) by Environmental Plus, Inc. for Duke Energy Field Services is **hereby approved** for 120 days with the following considerations:

- 48 hour notification to OCD prior to final sampling
- Disturbed areas to be seeded for re-vegetation of native grasses and other plants and demonstrate growth within a reasonable time after site remediation operations cease

Please be advised that OCD approval of this plan does not relieve Duke Energy Field Services of liability should their operations fail to adequately investigate and remediate contaminants that threaten ground water, surface water, human health or the environment. Additionally, OCD approval does not relieve Duke Energy Field Services of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions or need assistance please call (505) 393-6161, x111 or e-mail lwjohnson@state.nm.us

Sincerely,

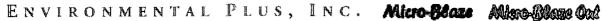
aluson

Larry Johnson - Environmental Engineer

Cc:

Chris Williams - District I Supervisor Bill Olson - Hydrologist Paul Sheeley-Environmental Engineer John Good – EIP Project Consultant jcgood4614@aol.com

Duke = 229153 Facility = FPAC 0602050276 Inadent = nPAC0602050413 application = pPAC0603139464



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STATE APPROVED LAND FARM AND ENVIRONMENTAL SERVICES

December 19, 2003

Mr. Larry Johnson New Mexico Oil Conservation Division 1625 North French Hobbs, New Mexico 88240

Subject: Duke Energy Field Services G-Extension-3 111903 (Site 1) Initial C-141 and Remediation Plan

Dear Mr. Johnson:

Environmental Plus, Inc. (EPI), on behalf of Mr. Paul Mulkey, Duke Energy Field Services, submits the attached New Mexico Oil Conservation Division Form C-141 for the above referenced leak site located on land owned by DASCO Cattle Company (Atlee Snyder). The release volume is estimated to be 4-bbl of NGL with 0-bbl recovered. The site is located in the NW¼ of the SE¼ (Unit Letter J), Section 31, Township 21 South, and Range 36 East. The geographic location is N32°26'06.26"; W103°18'10.97". The site is ~8.3 miles due west of Eunice, Lea County, New Mexico. According to information obtained from the New Mexico Office of the State Engineer (NMOSE) database and the land owner, ground water level beneath this site is >220-feet below ground surface (bgs). The ranking for this site is 0 for soils down to 120-ft bgs.

The remedial action plan for this site is to delineate and characterize the soil contamination within the affected area of the natural gas and liquids release, excavate and dispose of, and/or attenuate on-site the RCRA exempt contaminated soils, and backfill the excavation with clean soil obtained on-site and/or off-site from private or public sources. Any RCRA exempt contaminated soils excavated and removed from the site will be disposed of in a NMOCD approved land farm.

The Constituents of Concern (CoC's) and associated NMOCD acceptable remedial levels are as follows:

- BTEX⁸⁶²⁰ (Benzene, Toluene, Ethyl Benzene, and Xylenes): 50 mg/kg
- TPH^{8015m} (Total Petroleum Hydrocarbon): 5000 mg/kg (0-120-ft bgs); 1000 mg/kg (> 120-ft bgs)
- Benzene⁸⁶²⁰: 10 mg/kg

It is EPI's standard operating procedure to evaluate natural gas release sites for the presence of elevated levels of $SO_4^{=}$ and CI^{-} ions. These inorganic contaminants are often present in subsurface soils associated with sour gas releases and/or releases containing a brine component. Due to the anticipated shallow depth of contamination and >200-ft depth to groundwater at this release site, it is EPI's intent to presume that sulfates and chlorides will not be an issue in the remediation of this site. Bottom hole composite samples will be analyzed for chlorides and sulfates to confirm this presumption.

If there are any questions please call Mr. Ben Miller, or myself, at our office or at (505) 390-0288 and (505) 390-9804, respectively or Mr. Paul Mulkey at (505) 397-5716. All official written communications should be addressed to: ENVIRONMENTAL PLUS, INC. Micro-Blaze Micro-Blaze One

STATE APPROVED LAND FARM AND ENVIRONMENTAL SERVICES

Mr. Paul Mulkey Duke Energy Field Services 11525 West Carlsbad Highway Hobbs, New Mexico 88240

Sincerely, Jan Dand

Kohn Good EPI Environmental Consultant

 cc: Paul Mulkey, Duke Energy Field Services, w/enclosure Lynn Ward, Duke Energy Field Services – Midland, TX, w/enclosure Steve Weathers, Duke Energy Field Services – Denver, CO, w/enclosure Pat McCasland, EPI Technical Manager Ben Miller, EPI Vice President and General Manager Sherry Miller, EPI President File

<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240			State of New Mexico Energy Minerals and Natural Resources				Form C-141 Revised June 10, 2003		
District II			Enei	gy Minerals	and Natural	Resources			
1301 W. Grand Avenue, Artesia, NM 88210 District III				Oil Conservation Division				Submit 2 Copies to appropriate	
1000 Rio Brazos Road, Aztec, NM 87410				1220 South St. Francis Dr.				District Office in accordance with Rule 116 on back	
<u>District IV</u> 1220 S. St. Francis Dr., Santa Fe, NM 87505			Santa Fe, NM 87505				side of form		
	Release	• Notificat	ion and	Corrective	e Action - IN	FORMATIO	N ONLY		
		PERATOR			Contact		☑ Initial Report	□ Final Report	
	Name of Company DUKE ENERGY FIELD SERVICES					Paul Mulkey			
Address 11525 W. Carlsbad Hwy. Hobbs, NM 88240			, NM 88240	Telephone No. 505-397-5716					
Facility Name G-Extension-3					Facility Type	Natural Gas Ga	thering Pipeline		
Surface Owner	DASCO Cat	tle Co		Mineral Owner	NA		Lease No.	NA	
			Ι	OCATION C	F RELEASE				
Unit Letter	Section	Township	Range	Feet from	Feet from	Longitude	Latitude	County:	
J	31	215	36E	South Line	West Line	W103° 18' 10.97"	N32° 26' 06.26"	Lea	
				2525	2940		L	l	
				NATURE OF	γ		Volume Recovered		
Type of Release					1				
Natural Gas rele	ase and assoc	iated NGL's	8		4 bbl		0 bbl		
Source of Release					Date and Hour of	of Occurrence	Date and Hour of D	liscovery	
12" Steel Pipelin				<u> </u>	IGVED TO WIL	9	11/19/03		
Was Immediate Noti	-			n	If YES, To Whom?				
	103	⊔ _{No}	Noi	Required	NA				
By Whom?	NA				Date and Hour NA				
Was a Watercourse Reached?					If YES, Volume Impacting the Watercourse.				
If a Watercourse was	Immed Day	103	☑ No		NA				
	s impacted, Dest	ribe rully.							
NA									
Describe Cause of Pr	roblem and Rem	edial Action T	ken *				<u> </u>		
Internally Corrode									
Internany Corrouce	а рарение, гера	neu by clamp	ing ican						
Describe Area Affect	ted and Cleanup	Action Taken	*			·····			
	-								
~2238-ft ² surface sp soil above remedial	oill area affected goals will be ex	d + 24,000-it ⁻ (cavated and d	overspray. lisposed of	0-bbl of NGL re or remediated (ecovered from 4- on-site by EPL	bbl release. RCRA	Exempt Non-hazar	dous contaminated	
I hereby certify that the	information given a	bove is true and	complete to t	he best of my know	ladge and understand	that pursuant to NMOO	D rules and regulations	all operators are	
required to report and/o	r file certain release	e notifications and	perform cor	rective actions for r	eleases which may er	danger public health or	the environment. The a	cceptance of a C-141	
report by the NMOCD r pose a threat to ground			-		-		*		
compliance with any oth						or a contraction acts	not relieve the operator	of responsionity for	
Signature:	\mathcal{O}	sha I	al			OIL CONSERV	ATION DIVISION	<u>1</u>	
	- T	- 17			4				
Printed Name:		John Good			Approved by Di	strict Supervisor:			
Title:	Project Con	sultant - EP	тт						
			-		Approval Date:		Expiration Date:	· · · · · · · · · · · · · · · · · · ·	
E-mail Address:	jcgood4614(@aol.com							
					-Conditions of A	pproval:		Attached .	
Date:	12/19/03	Phone:	505	-394-3481					

Duke E	nergy Incident Date and	NMOCD Notified?	
Duke E Field Se	ervices 11/19/03	NA	
SITE: G-Extension-3		Assigned Site Reference 111903 [Site 1]	
Company:	DUKE ENERGY FIELD SERV		
Street Address:	5805 East Highway 80		
Mailing Address:	11525 W. Carlsbad Hwy.		
City, State, Zip:	Hobbs, NM 88240		
Representative:	Paul Mulkey		

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If Depth to GW >100 feet: 0 points

0

0

20 or >

10 ppm

Ground water Score:

Site Rank (1+2+3) =

Parameter

Benzene¹

Representative: Pau	ul Mulkey						
Representative Telephone: 505	5-397-5716						
Telephone:							
Fluid volume released (bbls):	4 Recovered (bbls): 0						
>25	ify NMOCD verbally within 24 hrs and submit form C-141 within 15 days.						
5-25 bbls: Submi	it form C-141 within 15 days (Also applies to unauthorized releases of 50-500 mcf Natural Gas)						
Leak, Spill, or Pit (LSP) Name:	111903 [Site 1]						
Source of contamination:	12" Steel Pipeline						
Land Owner, i.e., BLM, ST, Fee, Othe	DASCO Cattle Co. 225 E. Bender, Suite 150, Hobbs, NM 88240						
LSP Dimensions:	(GPS Site Diagram attached)						
LSP Area:	26,244 -ft ²						
Location of Reference Point (RP):							
Location distance and direction from F	RP:						
Latitude:	N32° 26' 06.26"						
Longitude:	W103° 18' 10.97"						
Elevation above mean sea level:	3635 -ft amsl						
Feet from South Section Line:	2525						
Feet from West Section Line:	2940						
Location - Unit and 1/4 1/4:	UL- J NW 1/4 of SE 1/4						
Location - Section:	31						
Location - Township:	21S						
Location - Range:	36E•						
Surface water body within 1000' radiu							
Surface water body within 1000' radiu	is of Site: 0						
Domestic water wells within 1000' radius of Site: 0							
Domestic water wells within 1000' radius of Site: 0							
Agricultural water wells within 1000' radius of Site: 0							
Agricultural water wells within 1000' radius of Site: 0							
Public water supply wells within 1000' radius of Site: 0							
Public water supply wells within 1000' radius of Site: 0							
Depth (ft) from land surface to ground	water (DG): 220						
Depth (ft) of contamination (DC):	20						
Depth (ft) to ground water (DG - DC = DtGW): 200							
1. Ground Water	2. Wellhead Protection Area 3. Distance to Surface Water Body						
If Depth to GW <50 feet: 20 points	If <1000' from water source, or, <200' from private demostic under						
If Depth to GW 50 to 99 feet: 10 point							
· · · · · · · · · · · · · · · · · · ·	If >1000' from water source, or,						
IS Double to OW > 100 Seats O a state							

BTEX¹ 50 ppm 50 ppm 100 ppm TPH 1000 ppm 5000 ppm ¹100 ppm field VOC headspace measurement may be substituted for lab analysis

source: 0 points

Total Site Ranking Score and Acceptable Concentrations

Wellhead Protection Area Scor 0 Surface Water Score:

10

10 ppm

>200' from private domestic water

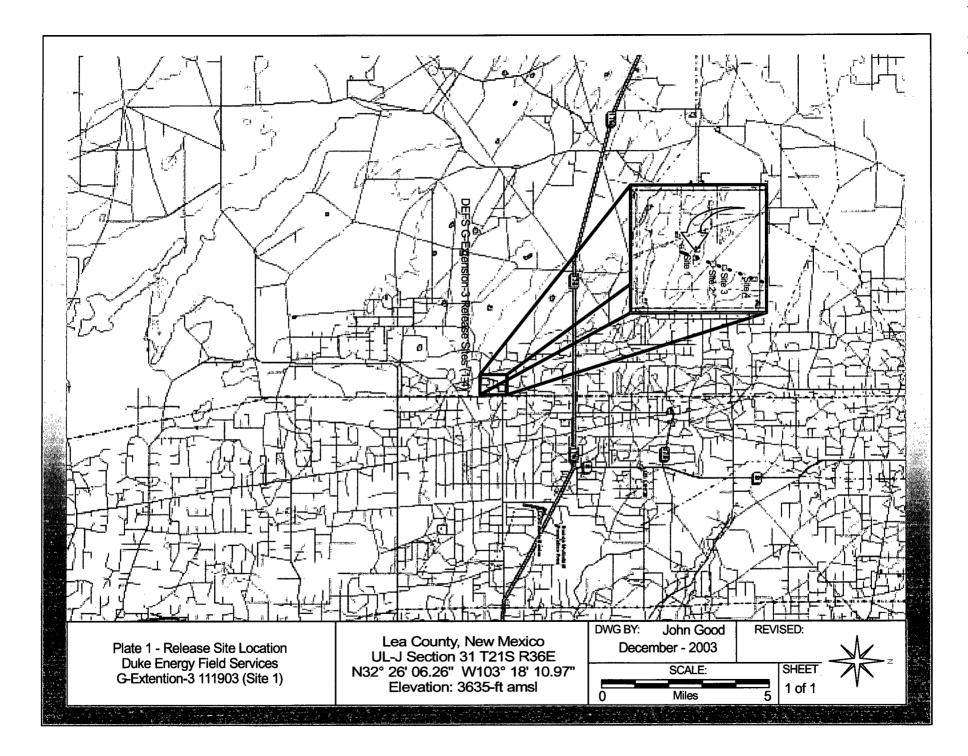
>1000 horizontal feet: 0 points

0

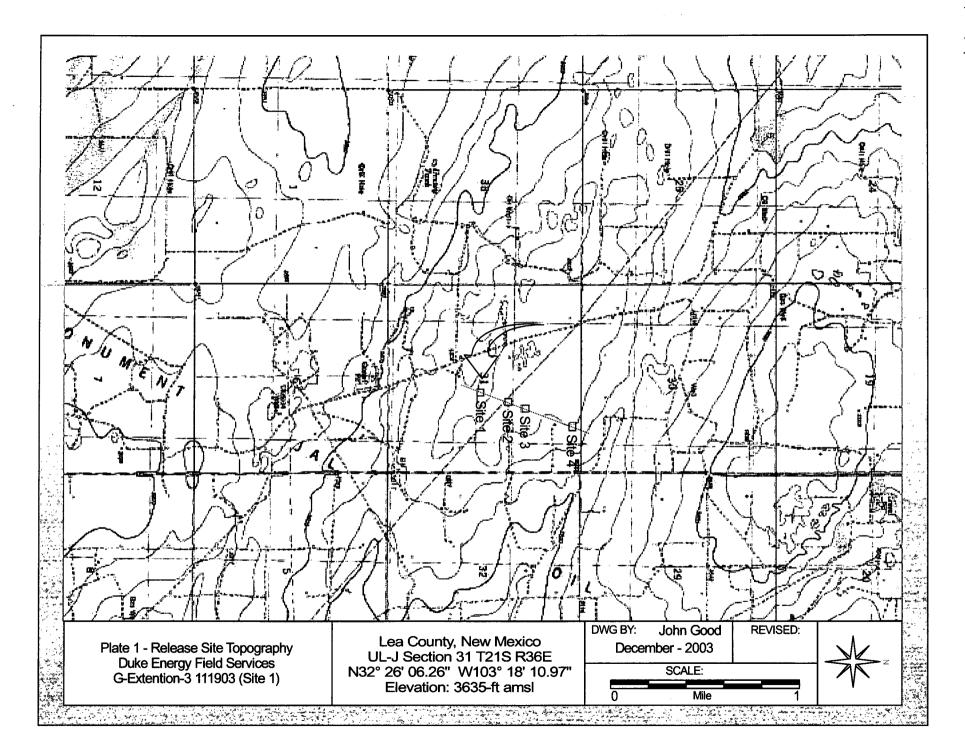
0

10 ppm

50 ppm



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