



PC  
1/20/06

3 May 2004

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

Re: Initial C-141  
Duke Energy Field Services G28-4, Reference #130002  
UL P, SE¼ of the SE¼ of Section 21 T22S R36E  
Latitude N 32° 22' 23.06" and Longitude W 103° 15' 52.09"

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 (NMOCD) form C-141 for the above referenced leak site located on land owned by the Miller Deck Estate, approximately 7.66 miles southwest of Eunice, New Mexico. The New Mexico Office of the State Engineer records indicate an average area depth to groundwater of approximately 160 feet below ground surface (BGS). The attached site information and metrics form ranks the site in accordance with the *NMOCD Guidelines for Remediation of Leaks, Spills and Releases (August 13, 1993)*.

Based on initial field observations, it was believed that the release was less than five barrels in volume; however, upon the receipt of initial laboratory analytical results, the size of the release can not be verified to be less than five barrels in volume. Based on the laboratory analytical results, Duke Energy Field Services requested EPI to submit an Initial C-141

A remediation plan will be developed and submitted for NMOCD approval and will address issues identified during delineation of the vertical and horizontal extents of contamination of the Constituents of Concern (CoCs) (i.e., chloride, sulfates, total petroleum hydrocarbons as gasoline and diesel, benzene, toluene, ethylbenzene and total xylenes (BTEX)). The contaminated soil is exempted from RCRA 40 CFR Part 261.

Duke = 229153  
facility = FPAC 0602039293  
incident = FPAC 0602039412  
application = FPAC 0603139831



ENVIRONMENTAL PLUS, INC.



ENVIRONMENTAL PLUS, INC.

Micro-Blaze

Micro-Blaze Oct™

STATE APPROVED LAND FARM AND ENVIRONMENTAL SERVICES

If there are any questions please call Mr. Ben Miller or myself at the office or at 505.390.0288 and 505.390.7306, respectively or Mr. Paul Mulkey at 505.397.5716. All official communication should be addressed to:

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

Sincerely,

ENVIRONMENTAL PLUS, INC.

Iain Olness, P.G.  
Hydrogeologist

cc: Lynn Ward, Duke Energy Field Services  
Paul Mulkey, Duke Energy Field Services  
Ben Miller, EPI Vice President and General Manager, w/o enclosure  
Sherry Miller, EPI President, w/o enclosure  
file

ENVIRONMENTAL PLUS, INC.

Duke Energy Field Services Site  
Information and Metrics

**Incident Date:**  
14 April 2004

**NMOCD Notified:**  
03 May 2004 @ 0730 hrs

<b>Site:</b> G28-4		<b>Assigned Site Reference #:</b> 130002	
<b>Company:</b> Duke Energy Field Services			
<b>Street Address:</b>			
<b>Mailing Address:</b> 11525 West Carlsbad Highway			
<b>City, State, Zip:</b> Hobbs, New Mexico 88240			
<b>Representative:</b> Paul Mulkey			
<b>Representative Telephone:</b> (505) 397-5716			
<b>Telephone:</b>			
<b>Fluid volume released (bbls):</b> unknown		<b>Recovered (bbls):</b> 0 bbls	
>25 bbls: Notify NMOCD verbally within 24 hrs and submit form C-141 within 15 days. (Also applies to unauthorized releases >500 mcf Natural Gas)			
5-25 bbls: Submit form C-141 within 15 days (Also applies to unauthorized releases of 50-500 mcf Natural Gas)			
<b>Leak, Spill, or Pit (LSP) Name:</b> G28-4			
<b>Source of contamination:</b> 8" Steel Pipeline			
<b>Land Owner, i.e., BLM, ST, Fee, Other:</b> Miller Deck Estate			
<b>LSP Dimensions:</b> 47' x 27'			
<b>LSP Area:</b> 1,205 sqft ft <sup>2</sup>			
<b>Location of Reference Point (RP):</b>			
<b>Location distance and direction from RP:</b>			
<b>Latitude:</b> N 32° 22' 23.06"			
<b>Longitude:</b> W 103° 15' 52.09"			
<b>Elevation above mean sea level:</b> 3,510' amsl			
<b>Feet from South Section Line:</b>			
<b>Feet from West Section Line:</b>			
<b>Location- Unit or 1/4:</b> SE 1/4 of the SE 1/4		<b>Unit Letter:</b> P	
<b>Location- Section:</b> 21			
<b>Location- Township:</b> T22S			
<b>Location- Range:</b> R36E			
<b>Surface water body within 1000' radius of site:</b> none			
<b>Surface water body within 1000' radius of site:</b> none			
<b>Domestic water wells within 1000' radius of site:</b> none			
<b>Domestic water wells within 1000' radius of site:</b> none			
<b>Agricultural water wells within 1000' radius of site:</b> none			
<b>Agricultural water wells within 1000' radius of site:</b> none			
<b>Public water supply wells within 1000' radius of site:</b> none			
<b>Public water supply wells within 1000' radius of site:</b> none			
<b>Depth from land surface to ground water (DG):</b> 160 bgs			
<b>Depth of contamination (DC):</b> Unknown			
<b>Depth to ground water (DG - DC = DtGW):</b> Unknown, however, it is assumed to be greater than 100 feet.			
<b>1. Ground Water</b>		<b>2. Wellhead Protection Area</b>	
If Depth to GW <50 feet: <i>20 points</i>		If <1000' from water source, or; <200' from private domestic water source: <i>20 points</i>	
If Depth to GW 50 to 99 feet: <i>10 points</i>			
If Depth to GW >100 feet: <i>0 points</i>		If >1000' from water source, or; >200' from private domestic water source: <i>0 points</i>	
<i>Ground water Score = 0</i>		<i>Wellhead Protection Area Score = 0</i>	
<i>Site Rank (1+2+3) = 0</i>			
<b>Total Site Ranking Score and Acceptable Concentrations</b>			
Parameter	>19	10-19	0-9
Benzene <sup>1</sup>	10 ppm	10 ppm	10 ppm
BTEX <sup>1</sup>	50 ppm	50 ppm	50 ppm
TPH	100 ppm	1000 ppm	5000 ppm
<sup>1</sup> 100 ppm field VOC headspace measurement may be substituted for lab analysis			

**District I**  
1625 N. French Dr., Hobbs, NM 88240  
**District II**  
1301 W. Grand Avenue, Artesia, NM 88210  
**District III**  
1000 Rio Brazos Road, Aztec, NM 87410  
**District IV**  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1999

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

### Release Notification and Corrective Action

#### OPERATOR

Initial Report  Final Report

<b>Name of Company</b> Duke Energy Field Services	<b>Contact</b> Paul Mulkey
<b>Address</b> 11525 West Carlsbad Highway Hobbs, New Mexico 88240	<b>Telephone No.</b> (505) 397-5716
<b>Facility Name</b> G28-4	<b>Facility Type</b> 8" Steel Pipeline

<b>Surface Owner</b> Miller Deck Estate	<b>Mineral Owner</b>	<b>Lease No.</b>
--	----------------------	------------------

#### LOCATION OF RELEASE

<b>Unit Letter</b> P	<b>Section</b> 21	<b>Township</b> T22S	<b>Range</b> R36E	<b>Feet from the North/South Line</b>	<b>Feet from the East/West Line</b>	<b>County:</b> Lea <b>Lat.</b> N 32° 22' 23.06" <b>Lon.</b> W 103° 15' 52.09"
-------------------------	----------------------	-------------------------	----------------------	---------------------------------------	-------------------------------------	---

#### NATURE OF RELEASE

<b>Type of Release</b> Natural Gas Pipeline Fluids	<b>Volume of Release</b> unknown barrels	<b>Volume Recovered</b> 0 barrels
<b>Source of Release</b> 8" Steel Pipeline	<b>Date and Hour of Occurrence</b> Duke Energy Field Services	<b>Date and Hour of Discovery</b> 04-14-04 @ 1600 hrs
<b>Was Immediate Notice Given?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	<b>If YES, To Whom?</b> Larry Johnson	
<b>By Whom?</b> Iain Olness, EPI	<b>Date and Hour</b> 3 May 2004 @ 0730 hrs	
<b>Was a Watercourse Reached?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>If YES, Volume Impacting the Watercourse.</b> NA	

**If a Watercourse was Impacted, Describe Fully.\***  
NA

**Describe Cause of Problem and Remedial Action Taken.\***  
Steel line began leaking due to internal corrosion. Pipe replaced and line tested.

**Describe Area Affected and Cleanup Action Taken.\***  
Approximately 1,205 square feet of pipeline right-of-way and pasture land were affected by the release. Soil contaminated above the NMOCD Remedial Guidelines will be disposed of at an approved facility or remediated on site. Remedial Goals: TPH 8015m = 5,000 mg/Kg, Benzene = 10 mg/Kg, and BTEX, i.e., the mass sum of Benzene, Ethyl Benzene, Toluene, and Xylenes = 50 mg/Kg.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

<b>Signature:</b>	<b><u>OIL CONSERVATION DIVISION</u></b>	
<b>Printed Name:</b> Paul Mulkey	<b>Approved by District Supervisor:</b>	
<b>E-mail Address:</b> pdmulkey@duke-energy.com	<b>Approval Date:</b>	<b>Expiration Date:</b>
<b>Title:</b> Maintenance Construction Supervisor	<b>Conditions of Approval:</b>	
<b>Date:</b> 3 May 2004 <b>Phone:</b> (505) 397-5716	<b>Attached</b> <input type="checkbox"/>	

\* Attach Additional Sheets If Necessary

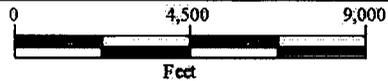


Figure 1  
 Area Map  
 Duke Energy Field Services  
 Duke G28-4

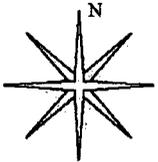
Lea County, New Mexico  
 SE 1/4 of the SE 1/4, Sec. 21, T22S, R36E  
 N 32° 22' 23.1" W 103° 15' 52.1"  
 Elevation: 3,507 feet amsl

DWG By: Iain Olness  
 April 2004

REVISED:



SHEET  
 1 of 1



G28-4  
 130002



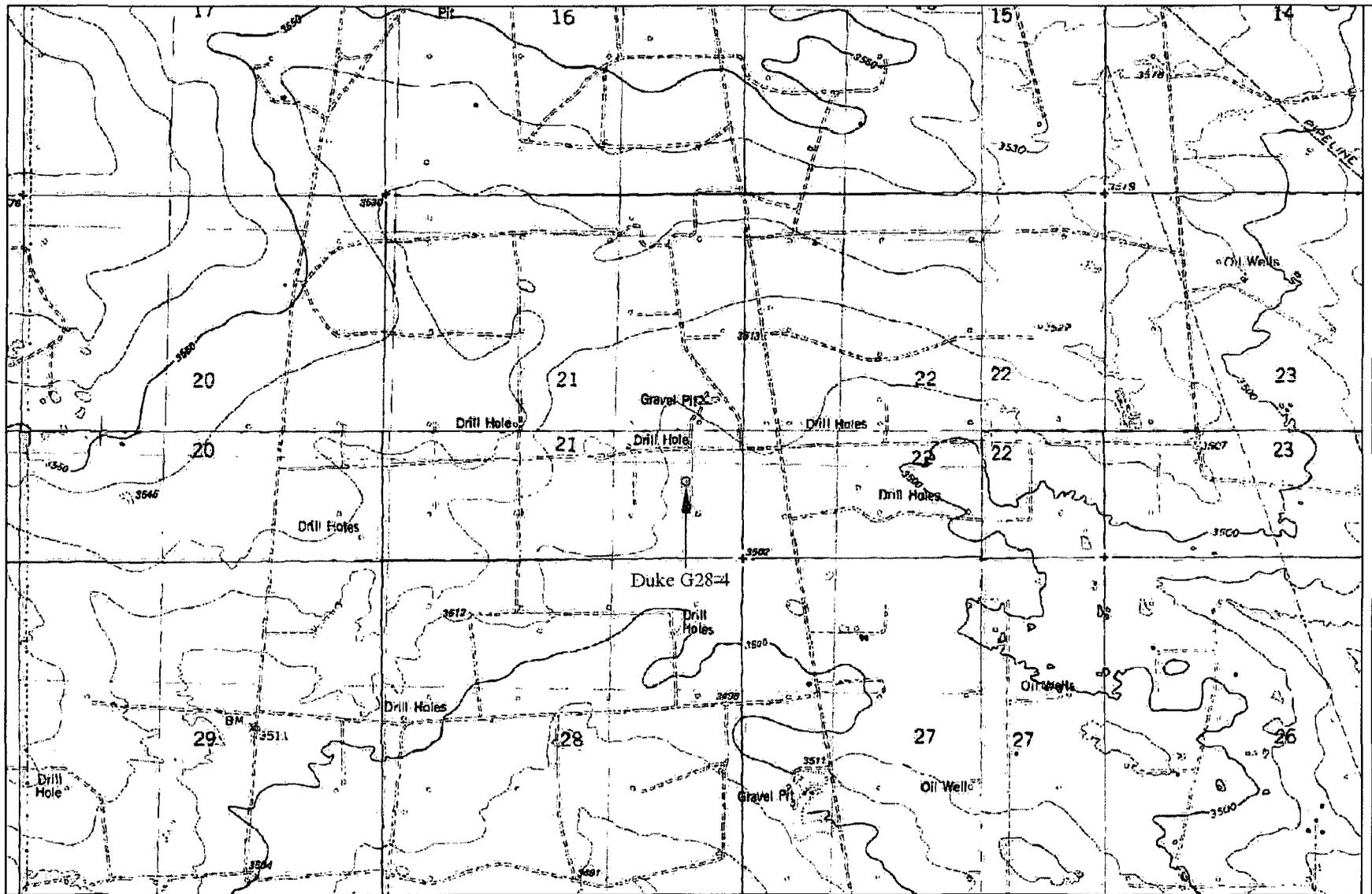
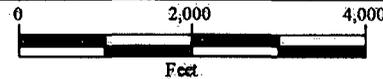


Figure 2  
 Site Location Map  
 Duke Energy Field Services  
 Duke G28-4

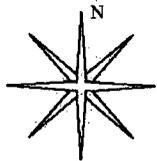
Lea County, New Mexico  
 SE 1/4 of the SE 1/4, Sec. 21, T22S, R36E  
 N 32° 22' 23.1" W 103° 15' 52.1"  
 Elevation: 3,507 feet amsl

DWG By: Iain Olness  
 April 2004

REVISED:



SHEET  
 1 of 1



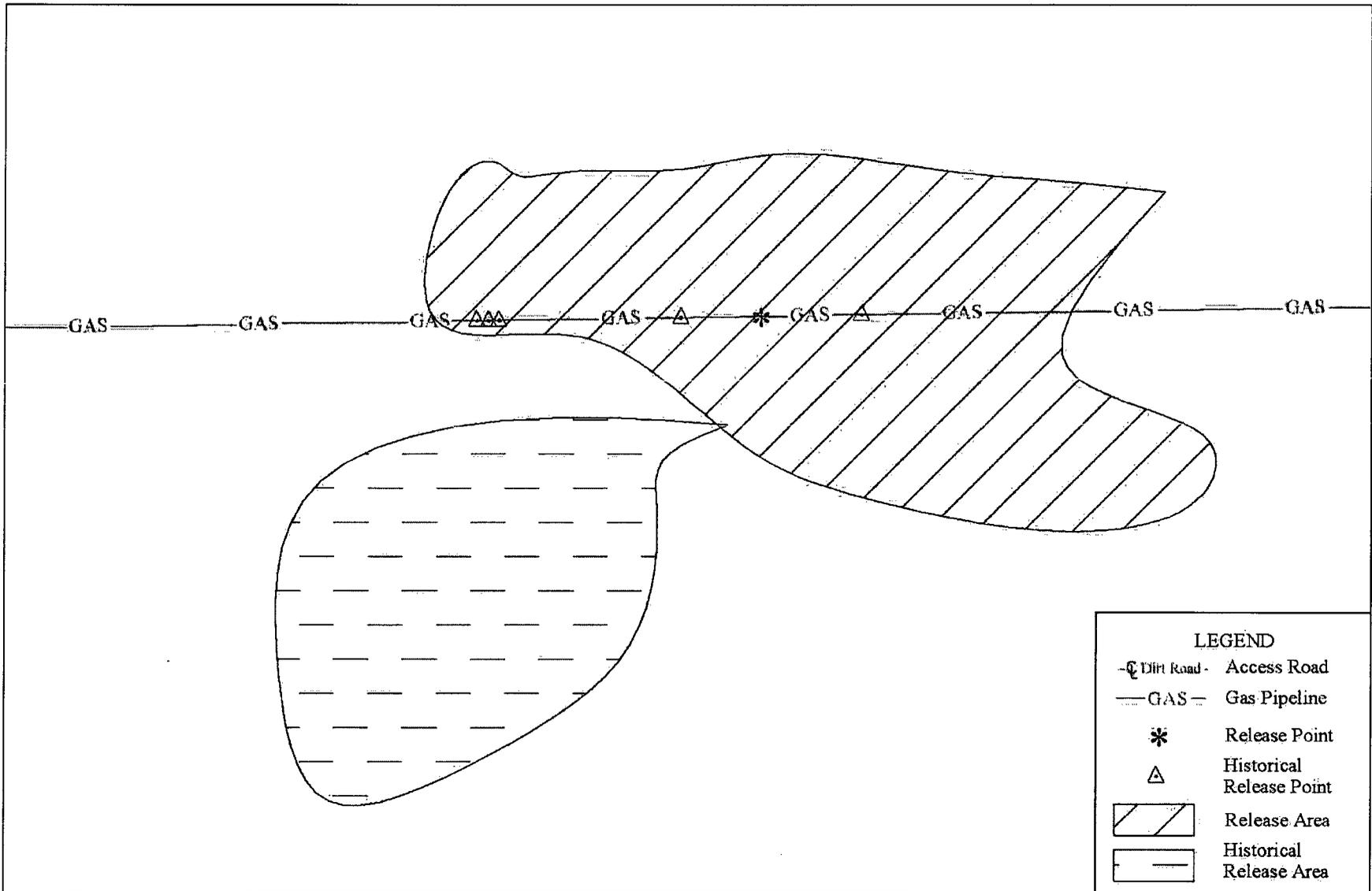
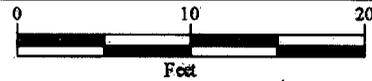


Figure 3  
Site Map  
Duke Energy Field Services  
Duke G28-4

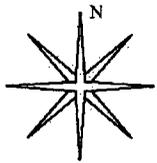
Lea County, New Mexico  
SE 1/4 of the SE 1/4, Sec. 21, T22S, R36E  
N 32° 22' 23.1" W 103° 15' 52.1"  
Elevation: 3,507 feet amsl

DWG By: Iain Olness  
May 2004

REVISED:



SHEET  
1 of 1

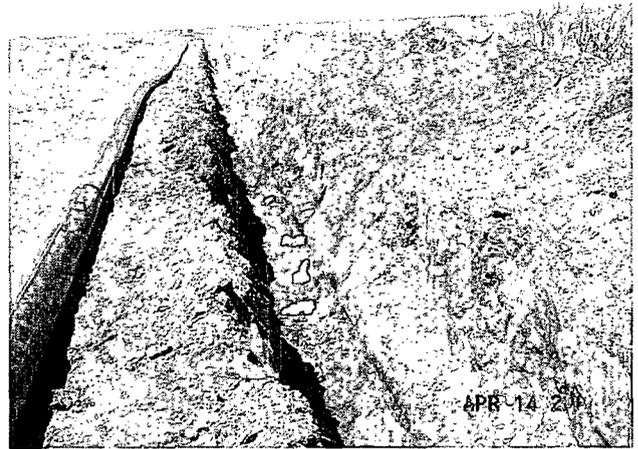


5

G28-4  
130002



Duke G28-4 release site, looking west. Note stained soil to the north and south of pipeline.



Duke G28-4 release site, looking west. Note stained soil in and around the excavation.



Duke G28-4 release site, looking west. Note stained soil in bottom of excavation.



Duke G28-4 release site, looking southwesterly. Digging trench to obtain samples.