

AP-078

Annual Report

**DATE:
2010**



January 13, 2010

Mr. Glenn von Gonten
New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**RE: Annual Report for the South Four Lakes #15 Site (AP-78)
T12S-R34E-Section 2, Unit Letter G, Lea County, New Mexico**

Dear Glenn:

As agent for Pride Energy Company (Pride), Trident Environmental submits this Annual Report to update the New Mexico Oil Conservation Division (NMOCD) of activities and ongoing investigations at the above referenced site. Below is a chronological list of site activity.

RECEIVED OGD
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December 10, 2007	Revised C-144 pit closure form approved by NMOCD (Elke Environmental)
January 8, 2008	Pit closure completed in accordance with NMOCD-approved C-144 (drilling pit contents solidified, encapsulated with plastic liner, and buried by Elke Env.)
January 8-21, 2008	Initial soil and groundwater sampling activities (Elke Environmental)
January 30, 2008	C-141 release notification form submitted (Elke Environmental)
February 12, 2008	NMOCD requires submission of Abatement Plan (AP-78)
April 7, 2008	Investigation and Remediation Plan (IRP) submitted to NMOCD
April 16, 2008	NMOCD verbally acknowledges IRP satisfies Abatement Plan requirements
May 29, 2008	Soil boring program initiated to define vertical and horizontal extent of impairment to groundwater (B-1, B-2, B-3, B-4, and MW-1)
October 1, 2008	Stage 2 Abatement Plan submitted to NMOCD
March 6, 2009	Stage 1 Abatement Plan administratively approved by NMOCD
March 20, 2009	Written notice for Stage 1 Abatement Plan sent to interested parties
March 24, 2009	Public notice for Stage 1 Abatement Plan published.
April 23, 2009	End of public notice period for Stage 1 Abatement Plan

The Stage 1 Abatement Plan is pending NMOCD approval (public notice period ended). Based on the findings of soil and groundwater investigations proposed in the Stage 1 Abatement Plan, the following work elements were proposed in the Stage 2 Abatement Plan:

- Installation of a recovery well (RW-1)
- Evaluation of aquifer test data to determine groundwater velocity, hydraulic conductivity, and potential well yields
- Implementation of an on-demand, pump-and-use groundwater restoration program
- Submission of an annual report with a recommendation for a natural restoration/monitoring groundwater remedy, or continuation of a pump-and-use groundwater restoration strategy
- Construction of an infiltration barrier (drilling pit closure plan)

The Stage 2 Abatement Plan is pending NMOCD administrative approval and public notice requirements.

Groundwater Monitoring Results

Groundwater monitoring activities have been performed at the site on a quarterly basis since January 2008 as summarized in Table 1 below. A site plan showing the recent ground water elevation and the chloride/TDS concentrations in monitoring well MW-1 is shown in Figure 1. Figure 2 is a graph depicting chloride and TDS concentrations and groundwater elevation versus time at monitoring well MW-1.

Table 1: Summary of Groundwater Monitoring Results (MW-1)

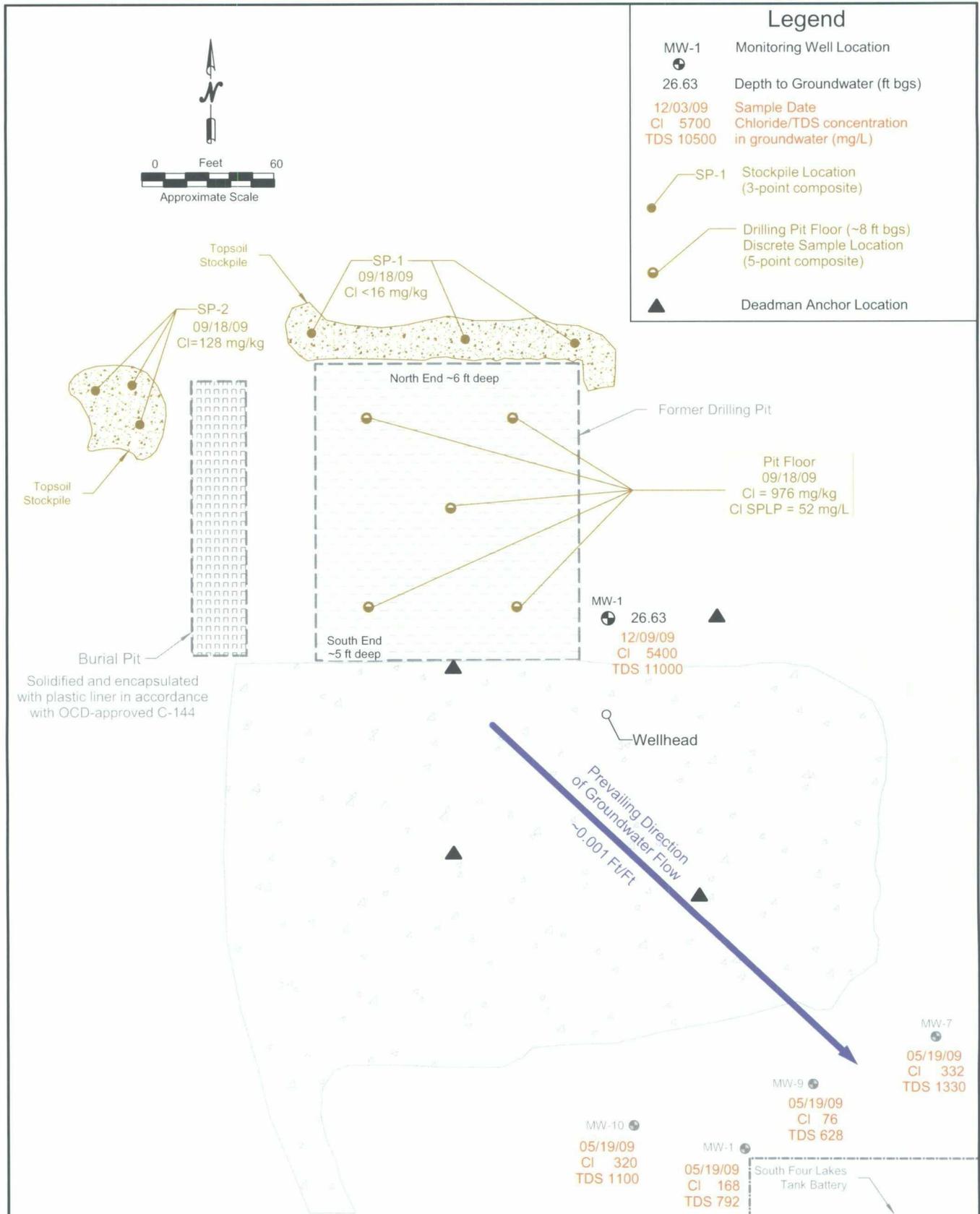
Sample Date	Depth to Groundwater (feet BTOC)	Groundwater Elevation (feet AMSL)	Chloride (mg/L)	TDS (mg/L)	Benzene (mg/L)	Toluene (mg/L)	Ethylbenzene (mg/L)	Xylene (mg/L)
01/23/08	29.10	4122.05	3,930	---	---	---	---	---
03/13/08	26.25	4124.90	4,150	9,820	<0.001	<0.001	<0.001	<0.003
06/20/08	26.46	4124.69	6,180	12,500	---	---	---	---
09/09/08	26.55	4124.60	4,850	9,700	<0.001	<0.001	<0.001	<0.003
12/08/08	26.63	4124.52	5,300	10,400	<0.001	<0.001	<0.001	<0.003
03/18/09	26.81	4124.34	5,400	11,000	<0.001	<0.001	<0.001	<0.003
06/17/09	27.01	4124.14	5,700	10,500	<0.001	<0.001	<0.001	<0.003
09/21/09	27.00	4124.15	5,700	10,000	<0.001	<0.001	<0.001	<0.003
12/09/09	26.63	4124.52	5,400	11,000	<0.001	<0.001	<0.001	<0.003
<i>WQCC Standards:</i>			<i>250</i>	<i>1000</i>	<i>0.10</i>	<i>0.75</i>	<i>0.75</i>	<i>0.62</i>

The constituents of concern in groundwater are chloride and TDS as they remain above the New Mexico's Water Quality Control Commission (WQCC) standards, of 250 mg/L and 1,000 mg/L, respectively. Benzene, toluene, ethylbenzene, and xylenes (BTEX) concentrations have been below laboratory detection limits and WQCC standards during the past two years; therefore, analysis for these constituents will be suspended, unless directed otherwise by the NMOCD. Quarterly ground water sampling and monitoring will continue.

Drilling Pit Excavation Closure Plan

To further prepare for implementation of the vadose zone remedy, as proposed in the Stage 2 Abatement Plan, a 5-point composite soil sample was collected on September 18, 2009 from the floor of the drilling pit (8 feet below ground surface) for analysis of chloride concentrations. Chloride concentration at the drilling pit floor is 976 mg/kg (method 4500-C1-B) and 52 mg/L (method SPLP 1312/4500-C1-B).

To confirm the suitability of stockpiled soil to be used as backfill material for the proposed vadose zone remedy, 3-point composite soil samples of the two existing stockpiles were also collected and analyzed for chloride content. The chloride concentrations in soil pile SP-1 (<16 mg/kg) and SP-2 (128 mg/kg) are at background concentrations and will support revegetation efforts. Soil from the drilling pit floor, mixed with stockpiled soil to reduce the chloride concentration, then capped with an infiltration barrier, will effectively abate any threat to ground water.

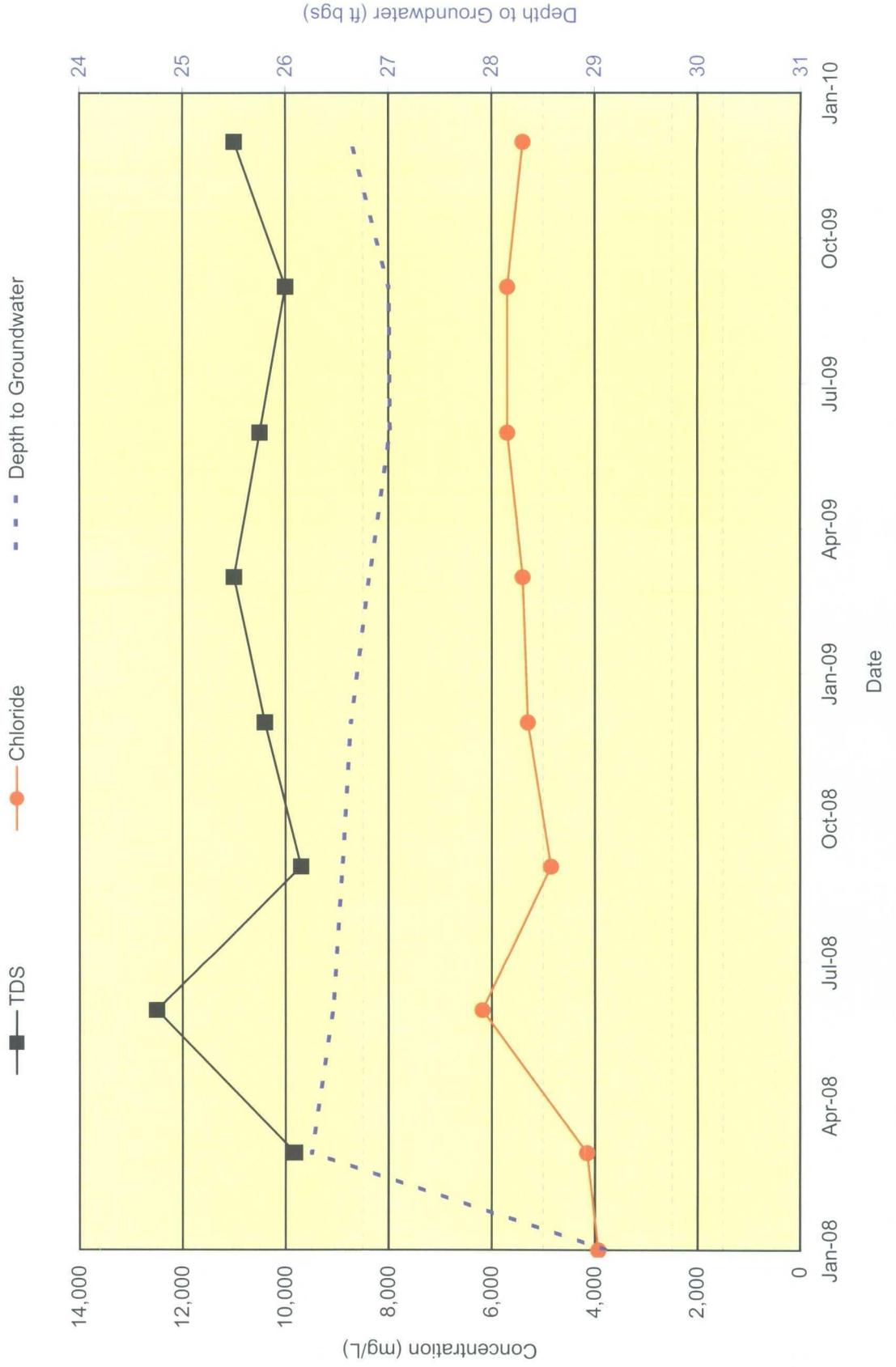


Pride Energy Company
 South Four Lakes #15 (AP-78)
 T12S - R34E - Section - Unit J
 Lea County, New Mexico

FIGURE 1
 Soil Sampling and
 Groundwater Monitoring Results

FIGURE 2

Chloride/TDS Concentrations and Groundwater Elevation Versus Time Graph (MW-1)



We look forward to working with you on this project. If you have any questions please call me at 432-638-8740 or Matt Pride at 918-524-9200.

Sincerely,

A handwritten signature in black ink, appearing to read "Gilbert Van Deventer". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

Gilbert Van Deventer, REM, PG
Trident Environmental

cc: Matt Pride (Pride Energy Co., Tulsa, OK)
Larry Hill (NMOCD -District 1, Hobbs, NM)

Attachments: *Laboratory analytical reports and chain of custody documentation*

ATTACHMENT A

Laboratory Analytical Reports

And

Chain of Custody Documentation



ANALYTICAL RESULTS FOR
 TRIDENT ENVIRONMENTAL
 ATTN: GIL VAN DEVENTER
 P.O. BOX 7624
 MIDLAND, TX 79708-7624
 FAX TO: (413) 403-9968

Receiving Date: 12/16/09
 Reporting Date: 12/17/09
 Project Number: SOUTH FOUR LAKES #15
 Project Name: PRIDE ENERGY COMPANY
 Project Location: T12S-R34E-SEC2 UNIT LETTER G ~
 LEA COUNTY - NEW MEXICO

Sampling Date: 12/11/09
 Sample Type: WATER
 Sample Condition: COOL & INTACT @ 1.5°C
 Sample Received By: CK
 Analyzed By: HM

LAB NO.	SAMPLE ID	Cl ⁻ (mg/L)	SO ₄ (mg/L)	TDS (mg/L)
Analysis Date:		12/16/09	12/16/09	12/16/09
H18890-1	MW-1	5,400	499	11,000
Quality Control		500	38.2	NR
True Value QC		500	40.0	NR
% Recovery		100	95.4	NR
Relative Percent Difference		< 0.1	1.6	5.6
METHOD: Standard Methods, EPA		4500-Cl ⁻ B	375.4	160.1

Not accredited for Chloride, Sulfate and TDS.


 Chemist


 Date

H18890 Trident

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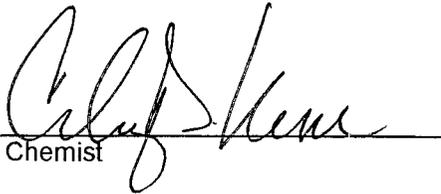
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 FAX TO: (413) 403-9968

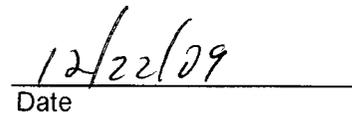
Receiving Date: 12/16/09 Sampling Date: 12/11/09
 Reporting Date: 12/18/09 Sample Type: WATER
 Project Number: SOUTH FOUR LAKE #15 Sample Condition: COOL & INTACT @ 1.5°C
 Project Name: PRIDE ENERY COMPANY Sample Received By: CK
 Project Location: T12S-R34E-SEC2 UNIT LETTER G ~ Analyzed By: ZL
 LEA COUNTY - NM

LAB NUMBER	SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE		12/17/09	12/17/09	12/17/09	12/17/09
H18890-1	MW-1	<0.001	<0.001	<0.001	<0.003
Quality Control		0.050	0.047	0.047	0.144
True Value QC		0.050	0.050	0.050	0.150
% Recovery		100	94.0	94.0	96.0
Relative Percent Difference		6.9	8.3	7.5	8.2

METHOD: EPA SW-846 8021 B

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE, AND TOTAL XYLENES.


 Chemist


 Date



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 FAX TO: (413) 403-9968

Receiving Date: 09/24/09 Sampling Date: 09/21/09
 Reporting Date: 09/29/09 Sample Type: WATER
 Project Number: SOUTH FOUR LAKES #15 Sample Condition: COOL & INTACT @ 1.5°C
 Project Name: PRIDE ENERGY COMPANY Sample Received By: ML
 Project Location: T12S-R34E-SEC2 UNIT LETTER G ~ LEA COUNTY - NEW MEXICO Analyzed By: HM

LAB NO.	SAMPLE ID	Cl ⁻ (mg/L)	SO ₄ (mg/L)	TDS (mg/L)
Analysis Date:		09/26/09	09/29/09	09/25/09
H18309-1	MW-1	5,700	568	10,000
Quality Control		500	36.9	NR
True Value QC		500	40.0	NR
% Recovery		100	92.4	NR
Relative Percent Difference		< 0.1	0.3	< 0.1
METHOD: Standard Methods, EPA		4500-ClB	375.4	160.1

Not accredited for Chloride, Sulfate and TDS.

Gil Van Deventer
 Chemist

09/29/09
 Date

H18309 Trident

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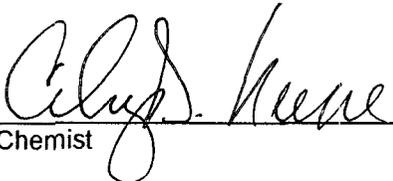
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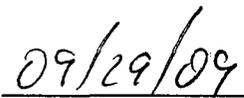
Receiving Date: 09/24/09 Sampling Date: 09/21/09
 Reporting Date: 09/28/09 Sample Type: WATER
 Project Number: SOUTH FOUR LAKES #15 Sample Condition: COOL & INTACT @ 1.5°C
 Project Name: PRIDE ENERY COMPANY Sample Received By: ML
 Project Location: T12S-R34E-SEC2 UNIT LETTER G ~ Analyzed By: ZL/CK
 LEA COUNTY - NM

LAB NUMBER	SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE		09/24/09	09/24/09	09/24/09	09/24/09
H18309-1	MW-1	<0.001	<0.001	<0.001	<0.003
Quality Control		0.049	0.046	0.049	0.161
True Value QC		0.050	0.050	0.050	0.150
% Recovery		98.0	92.0	98.0	107
Relative Percent Difference		1.2	0.9	1.4	1.2

METHOD: EPA SW-846 8021 B

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE, AND TOTAL XYLENES.


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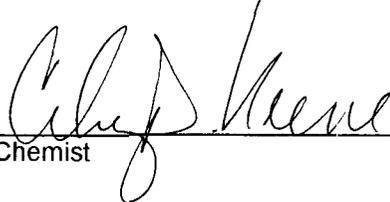
Receiving Date: 06/18/09
 Reporting Date: 06/23/09
 Project Number: SOUTH FOUR LAKES #15
 Project Name: PRIDE ENERY COMPANY
 Project Location: T12S-R34E-SEC2, UNIT LETTER G
 LEA COUNTY, NM

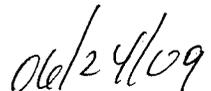
Sampling Date: 06/17/09
 Sample Type: WATER
 Sample Condition: COOL & INTACT
 @ 5°C
 Sample Received By: AB
 Analyzed By: ZL

LAB NUMBER	SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE		06/22/09	06/22/09	06/22/09	06/22/09
H17658-1	MW-1	<0.001	<0.001	<0.001	<0.003
Quality Control		0.047	0.046	0.046	0.137
True Value QC		0.050	0.050	0.050	0.150
% Recovery		94.0	92.0	92.0	91.3
Relative Percent Difference		<1.0	<1.0	<1.0	<1.0

METHOD: EPA SW-846 8021 B

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE,
 AND TOTAL XYLENES.


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Receiving Date: 03/19/09
 Reporting Date: 03/23/09
 Project Number: SOUTH FOUR LAKES #15
 Project Name: PRIDE ENERGY COMPANY
 Project Location: T12S-R34E-SEC2 UNIT LETTER G ~
 LEA CO., NM

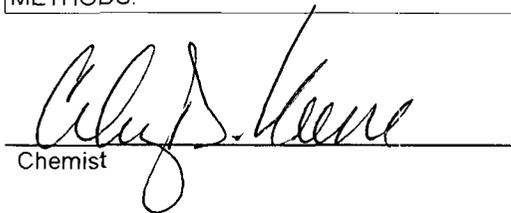
Sampling Date: 03/18/09
 Sample Type: WATER
 Sample Condition: COOL & INTACT
 Sample Received By: ML
 Analyzed By: HM/TR

LAB NUMBE	SAMPLE ID	Na (mg/L)	Ca (mg/L)	Mg (mg/L)	K (mg/L)	Conductivity (u S/cm)	T-Alkalinity (mgCaCO ₃ /L)
ANALYSIS DATE:		03/23/09	03/20/09	03/23/09	03/20/09	03/26/09	03/20/09
H17093-1	MW-1	2,470	962	158	7.7	14,200	192
Quality Control		NR	48.1	51.0	2.76	1,441	NR
True Value QC		NR	50.0	50.0	3.00	1,413	NR
% Recovery		NR	96.2	102	91.9	102	NR
Relative Percent Difference		NR	<0.1	<0.1	2.9	1.0	NR

METHODS:	SM3500-Ca-D	3500-Mg E	8049	120.1	310.1
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	Cl (mg/L)	SO ₄ (mg/L)	CO ₃ (mg/L)	HCO ₃ (mg/L)	pH (s.u.)	TDS (mg/L)	
ANALYSIS DATE:	03/20/09	03/20/09	03/20/09	03/20/09	03/20/09	03/20/09	
H17093-1	MW-1	5,400	611	0	234	7.37	11,000
Quality Control		500	41.8	NR	976	7.03	NR
True Value QC		500	40.0	NR	1000	7.00	NR
% Recovery		100	105	NR	97.6	100	NR
Relative Percent Difference		< 0.1	4.7	NR	2.4	2.3	0.6

METHODS:	SM4500-Cl-B	375.4	310.1	310.1	150.1	160.1
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 Chemist


 Date

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 FAX TO: (413) 403-9968

Receiving Date: 03/19/09
 Reporting Date: 03/23/09
 Project Number: SOUTH FOUR LAKES #15
 Project Name: PRIDE ENERGY COMPANY
 Project Location: T12S-R34E-SEC2 UNIT LETTER G
 ~ LEA CO., NM

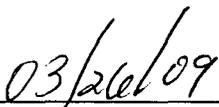
Sampling Date: 03/18/09
 Sample Type: WATER
 Sample Condition: COOL & INTACT
 Sample Received By: ML
 Analyzed By: ZL

LAB NUMBER SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE	03/20/09	03/20/09	03/20/09	03/20/09
H17093-1 MW-1	<0.001	<0.001	<0.001	<0.003
Quality Control	0.049	0.050	0.049	0.149
True Value QC	0.050	0.050	0.050	0.150
% Recovery	98.0	100	98.0	99.3
Relative Percent Difference	3.6	3.3	3.0	3.3

METHOD: EPA SW-846 8021 B

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE,
 AND TOTAL XYLENES.


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Receiving Date: 09/24/09
 Reporting Date: 09/25/09
 Project Number: SOUTH FOUR LAKES #15
 Project Name: PRIDE ENERGY COMPANY
 Project Location: T12S, R34E, SEC 2, UNIT G,
 LEA COUNTY, NM

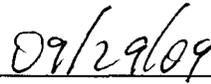
Analysis Date: 09/25/09
 Sampling Date: 09/18/09
 Sample Type: SOIL
 Sample Condition: COOL & INTACT @ 1.5°C
 Sample Received By: ML
 Analyzed By: HM

LAB NO.	SAMPLE ID	Cl ⁻ (mg/kg)
H18324-1	SP-1	< 16
H18324-2	SP-2	128
Quality Control		500
True Value QC		500
% Recovery		100
Relative Percent Difference		2.0

METHOD: Standard Methods 4500-Cl⁻B

Note: Analyses performed on 1:4 w:v aqueous extracts.


 Chemist


 Date

H18324 Trident Environmental

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 ATTN: GIL VAN DEVENTER
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Receiving Date: 09/24/09
 Reporting Date: 10/01/09
 Project Number: SOUTH FOUR LAKES #15
 Project Name: PRIDE ENERGY COMPANY
 Project Location: T12S, R34E, SEC 2, UNIT G,
 LEA COUNTY, NM

Analysis Date: 10/01/09
 Sampling Date: 09/18/09
 Sample Type: SOIL
 Sample Condition: COOL & INTACT @ 1.5°C
 Sample Received By: ML
 Analyzed By: HM

LAB NO.	SAMPLE ID	Cl ⁻ (mg/kg)
H18324-3	PIT FLOOR (8' BGS)	976
Quality Control		500
True Value QC		500
% Recovery		100
Relative Percent Difference		< 0.1

METHOD: Standard Methods 4500-Cl⁻B

Note: Analysis performed on a 1:4 w:v aqueous extract.

Clyde Keene
 Chemist

10/05/09
 Date

H18324Cl Trident Environmental

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 TRIDENT ENVIRONMENTAL
 ATTN: GIL VAN DEVENTER
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Receiving Date: 09/24/09
 Reporting Date: 09/29/09
 Project Number: SOUTH FOUR LAKES #15
 Project Name: PRIDE ENERGY COMPANY
 Project Location: T12S, R34E, SEC 2, UNIT G,
 LEA COUNTY, NM

Analysis Date: 09/29/09
 Sampling Date: 09/18/09
 Sample Type: SOIL
 Sample Condition: COOL & INTACT @ 1.5°C
 Sample Received By: ML
 Analyzed By: HM

LAB NO.	SAMPLE ID	SPLP Cl ⁻ (mg/L)
H18324-3	PIT FLOOR (8' BGS)	52
Quality Control		500
True Value QC		500
% Recovery		100
Relative Percent Difference		< 0.1
METHOD: Standard Methods		1312 / 4500-Cl ⁻ B

Gil Van Deventer
 Chemist

09/29/09
 Date

H18324SPLP Trident Environmental

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