

NM1 - 13

C-138

YEAR(S):

2001-1994

District I  
1625 N. Frengh Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

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Environmental Bureau  
Oil Conservation Division

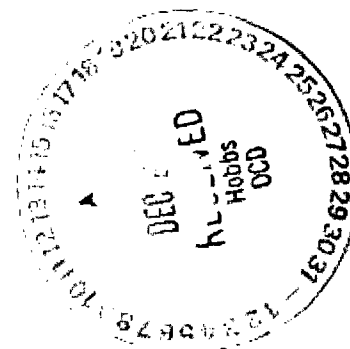
Form C-138  
Revised March 17, 1999

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Plus 1 Copy  
to Appropriate  
District Office

## REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <i>Plus Shred 12-4-01</i>	4. Generator <i>EDIT Energy Pipeline</i>
2. Management Facility Destination <i>Environmental Plus, Inc. (EPI)</i>	5. Originating Site <i>EDIT TWM 97-23</i>
3. Address of Facility Operator <i>3 miles South of Eunice</i>	6. Transporter <i>EPI</i>
7. Location of Material (Street Address or ULSTR) <i>NEX NEX Sec 14 T225A37E</i>	8. State <i>NM</i>
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. <input checked="" type="radio"/> All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved <i>Letter Attached</i> All transporters must certify the wastes delivered are only those consigned for transport.	

## BRIEF DESCRIPTION OF MATERIAL:



Estimated Volume 6000 cy Known Volume (to be entered by the operator at the end of the haul) 3797 cy

SIGNATURE *Robt McEwan* TITLE: *Tech Manager* DATE: *12-4-01*  
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: *Robt McEwan* TELEPHONE NO. *505.594.3489*

APPROVED BY: <u><i>[Signature]</i></u>	TITLE: <u><i>[Signature]</i></u>	DATE: <u><i>[Signature]</i></u>
APPROVED BY: <u><i>[Signature]</i></u>	TITLE: <u><i>[Signature]</i></u>	DATE: <u><i>[Signature]</i></u>

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REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <i>Paul Shirley 12-4-01</i>	4. Generator <i>EOT Energy Pipeline</i>
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BRIEF DESCRIPTION OF MATERIAL:

Estimated Volume 6000 cy Known Volume (to be entered by the operator at the end of the haul) \_\_\_\_\_ cy

SIGNATURE *Paul Shirley* TITLE: *Tech Manager* DATE: *12-4-01*  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: *Paul Shirley* TELEPHONE NO. *505.394.3481*

(This space for State Use)

APPROVED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_ DATE: \_\_\_\_\_  
APPROVED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_ DATE: \_\_\_\_\_



ENVIRONMENTAL PLUS, INC.

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STATE APPROVED LAND FARM AND ENVIRONMENTAL SERVICES

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: TNM 97-23  
Source: EDTT Pipeline NE 1/4 NE 1/4 Sec 14 T22S R37E  
Disposal Location: Environmental Plus, Inc.  
Cell 12

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for EDTT Energy Pipeline, concur with the status of the waste from the subject site.

Name Frank Hernandez  
Title/Agency D.E.S.  
Address 8012 W. Hwy 82  
Lovington, NM  
Signature Frank Hernandez  
Date 12-4-01



**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

September 17, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-288-258-835**

Ms. Lennah Frost  
Environmental Engineer  
EOTT Energy  
P.O. Box 1660  
Midland, Texas 79702

**RE: CRUDE OIL GATHERING SYSTEM SPILLS**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Operating Limited Partnership (EOTT) August 8, 1996 correspondence which presents the results of representative RCRA hazardous waste characteristic sampling of contaminated soils from pipeline related spills of crude oil. EOTT requests that they be allowed to use these analyses and a statement of process knowledge for determining the soils to be RCRA non-hazardous during future crude oil pipeline spill remediations. These analyses are to be used in lieu of individual sampling of each spill event.

The above referenced request is approved with the following conditions:

1. The above representative analyses can be used in lieu of individual sampling of each spill event.
2. EOTT will reference the above waste determination identified as "EOTT-DENTON-8896" in all future RCRA non-exempt crude oil spill reports to the OCD.
3. EOTT will notify the OCD within 24 hours of any system changes which could potentially alter the composition of any spilled crude such that RCRA hazardous waste characteristics in the spill area could be exceeded.

Ms. Lennah Frost  
September 17, 1996  
Page -2-

Please be advised that OCD approval does not relieve EOTT of liability should these types of leaks and spills result in actual contamination of surface waters, ground waters or the environment. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and/or regulations. If you have questions please contact me at (505) 827-7152.

Sincerely,



Roger C. Anderson  
Environmental Bureau Chief

xc: OCD Artesia District Office  
Benito Garcia, NMED Hazardous and Radioactive Waste Bureau

<p><b>SENDER:</b></p> <ul style="list-style-type: none"> <li>■ Complete items 1 and/or 2 for additional services.</li> <li>■ Complete items 3, 4a, and 4b.</li> <li>■ Print your name and address on the reverse of this form so that we can return this card to you.</li> <li>■ Attach this form to the front of the mailpiece, or on the back if space does not permit.</li> <li>■ Write "Return Receipt Requested" on the mailpiece below the article number.</li> <li>■ The Return Receipt will show to whom the article was delivered and the date delivered.</li> </ul>		<p>I also wish to receive the following services (for an extra fee):</p> <p>1. <input type="checkbox"/> Addressee's Address</p> <p>2. <input type="checkbox"/> Restricted Delivery</p> <p>Consult postmaster for fee.</p>	
<p>3. Article Addressed to:</p> <p>Ms Lennah Frost EOTT Emergency P.O. Box 1660 Midland Tx 79702</p>		<p>4a. Article Number</p> <p>P 288 285 835</p>	
<p>5. Received By: (Print Name)</p> <p>Sherry Sunday</p>		<p>4b. Service Type</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified</p> <p><input type="checkbox"/> Express Mail <input type="checkbox"/> Insured</p> <p><input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD</p>	
<p>6. Signature: (Addressee or Agent)</p> <p>X</p>		<p>7. Date of Delivery</p> <p>SEP 25 1996</p>	
<p>8. Addressee's Address (Only if requested and fee is paid)</p>		<p>9. Return Receipt for Merchandise (Only if requested and fee is paid)</p>	

Is your RETURN ADDRESS completed on the reverse side?

PS Form 3811, December 1994

Domestic Return Receipt

This is for you to use for Return Receipt Service.

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Environmental Bureau  
Oil Conservation Division

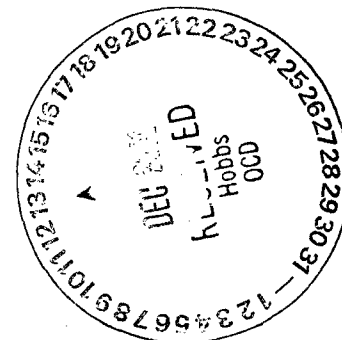
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1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/>	4. Generator <i>EOT Energy Pipeline</i>
Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <i>Plus Shreeley 12-4-01</i>	5. Originating Site <i>EOT TUM 97-23</i>
2. Management Facility Destination <i>Environmental Plus, Inc. (EPI)</i>	6. Transporter <i>EPI</i>
3. Address of Facility Operator <i>3 miles South of Eunice</i>	8. State <i>NM</i>
7. Location of Material (Street Address or ULSTR) <i>NE 1/4 NE 1/4 Sec 14 T22S R37E</i>	
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BRIEF DESCRIPTION OF MATERIAL:



Estimated Volume 6000 cy Known Volume (to be entered by the operator at the end of the haul) \_\_\_\_\_ cy

SIGNATURE *Pat McEwan* TITLE: *Tech Manager* DATE: *12-4-01*  
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: *Pat McEwan* TELEPHONE NO. *505.394.3481*

(This space for State Use)

APPROVED BY: <u><i>Chuck Shreeley</i></u>	TITLE: <u><i>Environmental Eng.</i></u>	DATE: <u><i>12-5-01</i></u>
APPROVED BY: <u><i>Patricia J. Kelly</i></u>	TITLE: <u><i>Environmental Geology</i></u>	DATE: <u><i>12-18-01</i></u>



**ENVIRONMENTAL PLUS, INC.**  
STATE APPROVED LAND FARM AND ENVIRONMENTAL SERVICES

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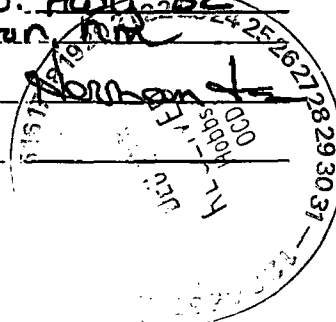
CERTIFICATE OF WASTE STATUSNON-EXEMPT WASTE MATERIAL

Originating Location: TNM 97-23  
Source: EDTT Pipeline NE 1/4 NE 1/4 Sec 14 T22S R37E  
Disposal Location: Environmental Plus, Inc. Cell 12

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for EDTT Energy Pipeline, concur with the status of the waste from the subject site.

Name Frank Norman  
Title/Agency D.E.S.  
Address 8012 W. Highway 62  
Livingston, NM  
Signature Frank Norman  
Date 12-4-01



P.O. BOX 1558 ... 2100 WEST AVENUE O ... EUNICE, NEW MEXICO 88231  
TELEPHONE 505-394-3481 FAX 505-394-2601



**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION  
2046 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

September 17, 1996

**CERTIFIED MAIL**

**RETURN RECEIPT NO. P-288-258-835**

Ms. Lennah Frost  
Environmental Engineer  
EOTT Energy  
P.O. Box 1660  
Midland, Texas 79702

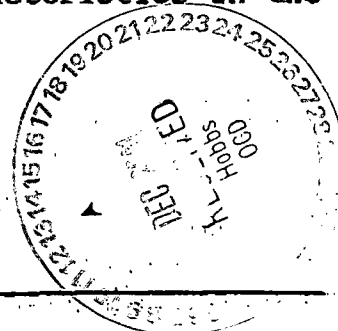
**RE: CRUDE OIL GATHERING SYSTEM SPILLS**

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FEB-19-01 MON 04:59 PM

Ms. Lennah Frost  
September 17, 1996  
Page -2-

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Roger C. Anderson  
Environmental Bureau Chief

xc: OCD Artesia District Office  
Benito Garcia, NMED Hazardous and Radioactive Waste Bureau

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3. Article Addressed to: Ms. Lennah Frost EOTT Energy P.O. Box 1660 Midland Tx 79702		4a. Article Number P 286 285 835	
5. Received By: (Print Name) Sharon L. Sunday		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Certified <input type="checkbox"/> Insured <input type="checkbox"/> COD	
6. Signature: (Addressee or Agent) X		7. Date of Delivery SEP 25 1996	
PS Form 3811, December 1994		8. Addressee's Address (Only Requested and fee is paid) SEP 25 1996	

Is your RETURN ADDRESS completed on the reverse side?

Domestic Return Receipt

The nk you for using Return Receipt Service.

OXY USA WTP LIMITED PARTNERSHIP

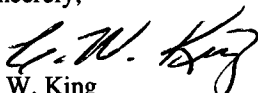
State of New Mexico  
Energy Minerals and Natural Resources Department  
Oil Conservation Division  
1625 N. French Drive  
Hobbs, N.M. 88240

December 7, 2001

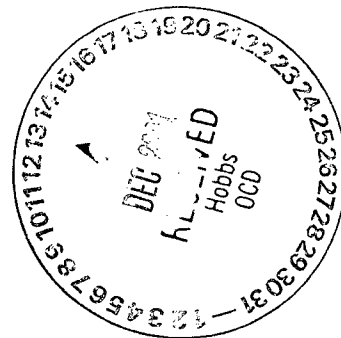
To Whom It May Concern:

Attached you will find Form C-141 regarding a spill on December 7, 2001, at the Myers Langlie Mattix Unit Well #263, operated by Oxy USA WTP Limited Partnership. If your department investigates the location and find that we have not met NMOCD regulations please notify us. If there is anything else you need please call John Erickson in Hobbs at 505-393-2174.

Sincerely,

  
C. W. King  
HES Technician

cc/Frontier – Hobbs Office HES files.



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Energy Minerals and Natural Resources  
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Oil Conservation Division

Form C-138  
Revised March 17, 1999

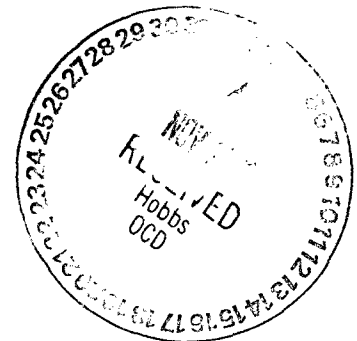
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1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <i>Chris Williams</i>	4. Generator <i>EOTT Energy Pipeline</i>
2. Management Facility Destination <i>ENVIRONMENTAL PLUS, INC. (EPI)</i>	5. Originating Site <i>EOTT Altura Hoover 6 "Gathering"</i>
3. Address of Facility Operator <i>2100 Ave O, Eunice NM 88231</i>	6. Transporter <i>EPI</i>
7. Location of Material (Street Address or ULSTR) <i>UL-19 Sec 5 T18S R36E</i>	8. State <i>NM</i>
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BRIEF DESCRIPTION OF MATERIAL:

*Crude oil contaminated soil*



Estimated Volume 24 cy Known Volume (to be entered by the operator at the end of the haul) 14 cy

SIGNATURE *Pat McCasland* TITLE: *Technical Manager* DATE:       
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: PAT MCCASLAND TELEPHONE NO. 505.394.3481

(This space for State Use)

APPROVED BY: *Paul Stealy* TITLE: ENVIRONMENTAL ENGINEER DATE: 11-16-01  
APPROVED BY: *Monty J. Kelly* TITLE: Environmental Geologist DATE: 11-26-01

112601-1



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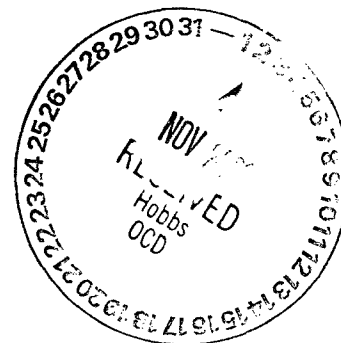
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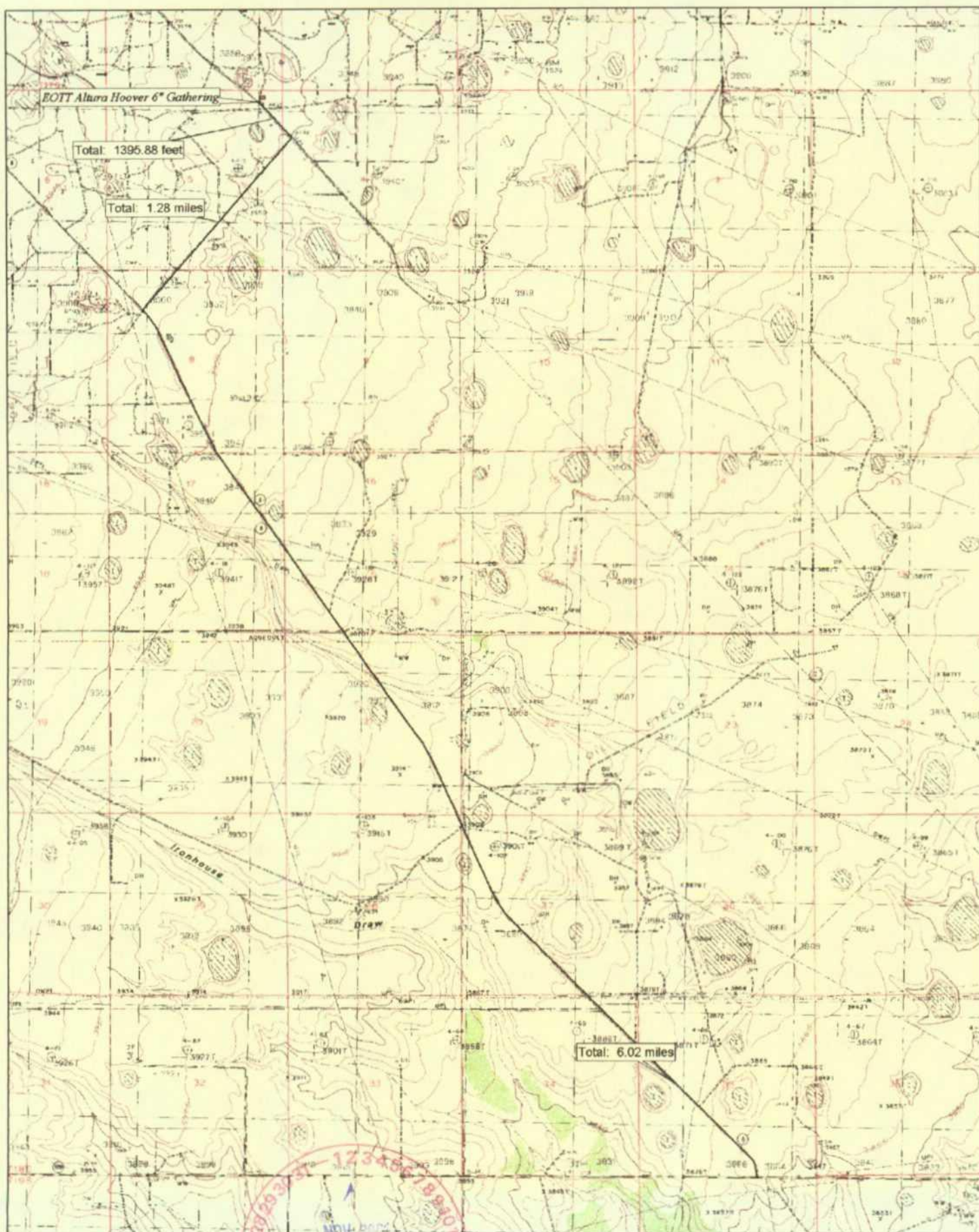
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Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: *PAT MCCASLAND* TELEPHONE NO. *505-394-3481*

(This space for State Use)

APPROVED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_ DATE: \_\_\_\_\_  
APPROVED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_ DATE: \_\_\_\_\_

NON-EXEMPT WASTE MATERIAL

Disposal Location: Environmental Plus, Inc.





NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
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September 17, 1996

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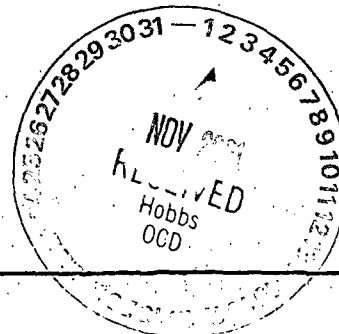
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FEB-19-01 MON 04:59 PM

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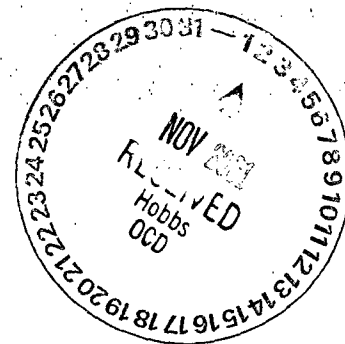
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Sincerely,



Roger C. Anderson  
Environmental Bureau Chief

xc: OCD Artesia District Office  
Benito Garcia, NMED Hazardous and Radioactive Waste Bureau



Is your RETURN ADDRESS completed on the reverse side?	<b>SENDER:</b> ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
	3. Article Addressed to: Ms Lennah Frost EOTT Emergency P.O. Box 1660 Midland Tx 79707		4a. Article Number P 288 285 835	
	5. Received By: (Print Name) Sherry L. Bunday		4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD	
	6. Signature: (Addressee or Agent) X		7. Date of Delivery SEP 25 1996	
			8. Addressee's Address (Only if requested and fee is paid)	

PS Form 3811, December 1994 Domestic Return Receipt

The ask you for using Return Receipt Service.



District I  
1825 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

RECEIVED

NOV 26 2001

Form C-138  
Revised March 17, 1999

Submit Original  
Plus 1 Copy  
to Appropriate  
District Office

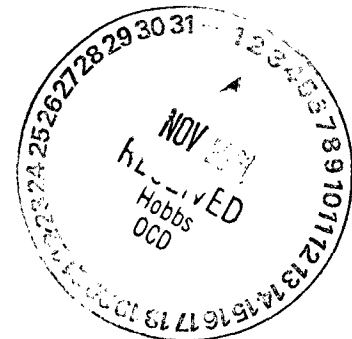
Environmental Bureau  
Oil Conservation Division

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	4. Generator <u>EOTT</u> 5. Originating Site <u>Turnu B North Levee</u>
2. Management Facility Destination <u>Environmental Plus, Inc.</u>	6. Transporter <u>Environmental Plus, Inc.</u>
3. Address of Facility Operator <u>3 miles S. of Eunice, PO Box 1558 Eunice NM 88231</u>	8. State <u>NM</u>
7. Location of Material (Street Address or ULSTR) <u>UL-B Sec 18 T12S R3/E</u>	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Crude oil contaminated soil



Estimated Volume 12 cy Known Volume (to be entered by the operator at the end of the haul) 14 yds cy

SIGNATURE [Signature] TITLE: Technical Mgr DATE: 8.15.01  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: PAT MCCONLAND TELEPHONE NO. 505.394.3481

(This space for State Use)

APPROVED BY: [Signature] TITLE: ENVIRONMENTAL ENGINEER DATE: 11-16-01  
APPROVED BY: [Signature] TITLE: Environmental Geologist DATE:

112661-2

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-138  
Revised March 17, 1999

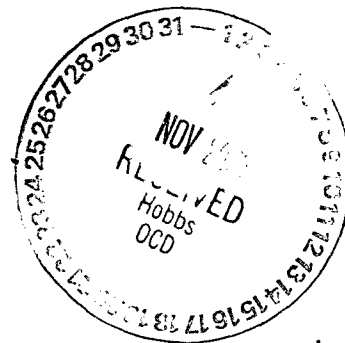
Submit Original  
Plus 1 Copy  
to Appropriate  
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/>	4. Generator <u>EOTT</u>
Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5. Originating Site
2. Management Facility Destination <u>Environmental Plus, Inc.</u>	6. Transporter <u>Environmental Plus, Inc.</u>
3. Address of Facility Operator <u>3 miles S. of Eunice, PO Box 1558 Eunice NM 88231</u>	8. State <u>NM</u>
7. Location of Material (Street Address or ULSTR) <u>UL-B Sec 18 T12S R31E</u>	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. <input checked="" type="radio"/> B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Crude oil contaminated soil



Estimated Volume 12 cy Known Volume (to be entered by the operator at the end of the haul) 14 1/2 cy

SIGNATURE [Signature]  
Waste Management Facility Authorized Agent

TITLE: Technical Mgr

DATE: 8-15-01

TYPE OR PRINT NAME: PAT MCNEILAND

TELEPHONE NO. 505.394.3481

(This space for State Use)

APPROVED BY: _____	TITLE: _____	DATE: _____
APPROVED BY: _____	TITLE: _____	DATE: _____

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: E.O.T.T. Turner "B" North Receiver

Source: Crude Oil Pipeline : UL-B sec. 18 T175 R31E

Disposal Location: Environmental Plus, Inc. Landfarm

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for Enron Transportation Services concur with the status of the waste from the subject site.

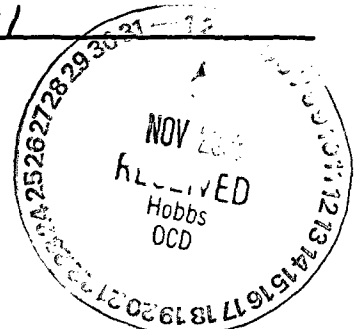
Name Frank Hernandez

Title/Agency Enron Transportation Services

Address PO Box 1660  
Midland, TX 79703

Signature Frank Hernandez

Date 8.15.01





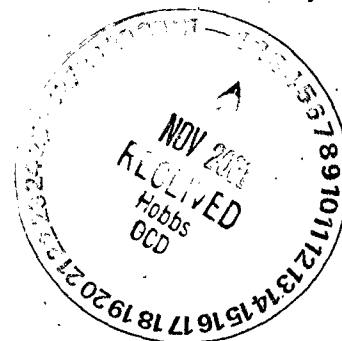
**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

September 17, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-288-258-835**

Ms. Lennah Frost  
Environmental Engineer  
EOTT Energy  
P.O. Box 1660  
Midland, Texas 79702



**RE: CRUDE OIL GATHERING SYSTEM SPILLS**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Operating Limited Partnership (EOTT) August 8, 1996 correspondence which presents the results of representative RCRA hazardous waste characteristic sampling of contaminated soils from pipeline related spills of crude oil. EOTT requests that they be allowed to use these analyses and a statement of process knowledge for determining the soils to be RCRA non-hazardous during future crude oil pipeline spill remediations. These analyses are to be used in lieu of individual sampling of each spill event.

The above referenced request is approved with the following conditions:

1. The above representative analyses can be used in lieu of individual sampling of each spill event.
2. EOTT will reference the above waste determination identified as "EOTT-DENTON-8896" in all future RCRA non-exempt crude oil spill reports to the OCD.
3. EOTT will notify the OCD within 24 hours of any system changes which could potentially alter the composition of any spilled crude such that RCRA hazardous waste characteristics in the spill area could be exceeded.

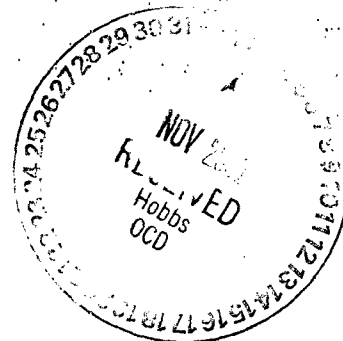
Ms. Lennah Frost  
September 17, 1996  
Page -2-

Please be advised that OCD approval does not relieve EOTT of liability should these types of leaks and spills result in actual contamination of surface waters, ground waters or the environment. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and/or regulations. If you have questions please contact me at (505) 827-7152.

Sincerely,

*Roger C. Anderson*  
Roger C. Anderson  
Environmental Bureau Chief

xc: OCD Artesia District Office  
Benito Garcia, NMED Hazardous and Radioactive Waste Bureau



Is your RETURN ADDRESS completed on the reverse side?	<b>SENDER:</b> ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
	3. Article Addressed to: Ms Lennah Frost EOTT Energy P.O. Box 1660 Midland Tx 79701		4a. Article Number P 288 285 835	
			4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD	
	5. Received By: (Print Name) Sherry S. Sunday		7. Date of Delivery SEP 25 1996	
	6. Signature: (Addressee or Agent) X		8. Addressee's Address (Only if requested and fee is paid)	

1324 North Main Street  
P.O. Box 1558  
Eunice, New Mexico 88231  
TEL: 505.394.3481  
FAX: 505.394.2601

## ENVIRONMENTAL PLUS, INC.

# Fax



# Micro-Blaze

**To:** Roger Anderson

**From:** Pat McCasland

**Fax:** 505.476.3462

**Pages:** 5

**Phone:** 505.476.3490

**Date:** 8/15/2001

**Re:** EOTT C-138 approval

**CC:** Paul Sheeley, NMOCD Hobbs

393-0720

☐ Urgent    ☐ For Review    ☐ Please Comment    ☐ Please Reply    ☐ Please Recycle

• **Comments:**

Mr. Anderson,

Attached is the Waste Certification signed by E.O.T.T., the E.O.T.T. waste acceptance letter generated and issued to E.O.T.T. by the NMOCD in 1996, and the NMOCD form C-138 requesting disposal of non-exempt crude oil contaminated waste from an EOTT location into the Environmental Plus, Inc. (EPI) landfarm. Please convey verbal approval as soon as possible.

Sincerely,

Pat McCasland

Technical Manager, EPI

District I - (505) 393-6161  
O. Box 1930  
obbs, NM 88241-1980  
District II - (505) 748-1283  
11 S. First  
rusia, NM 88210  
District III - (505) 334-6178  
000 Rio Brazos Road  
ztec, NM 87410  
District IV - (505) 827-7131

New Mexico  
Energy Minerals and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

Form C-138  
Originated 8/8/95

RECEIVED

NOV 26 2001

Environmental Bureau  
Oil Conservation Division

Submit Original  
Plus 1 Copy  
to appropriate  
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒

Verbal Approval Received: <sup>P</sup>Sheeley Yes ☒ No ☐

4. Generator EDT Energy Pipeline

5. Originating Site Mark Battery #2

2. Management Facility Destination Environmental Plus, Inc.

6. Transporter EPI

3. Address of Facility Operator 2100 Ave O Eunice NM

8. State NM

7. Location of Material (Street Address or ULSTR) UL-6 Sec 3 T22S R37E

9. Circle One:

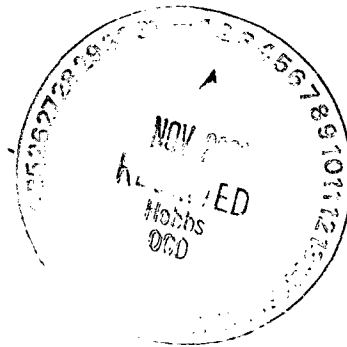
A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

☒ B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. see attached NMOC letter.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

Crude oil contaminated soil.



Estimated Volume -200 cy Known Volume (to be entered by the operator at the end of the haul) 12 cy

SIGNATURE: Pat McCasland  
Waste Management Facility Authorized Agent

TITLE: Technical Manager

DATE: 8.29.01

TYPE OR PRINT NAME: Pat McCasland

TELEPHONE NO. 505-394-3481

(This space for State Use)

APPROVED BY: Paul Cleary

TITLE: ENVIRONMENTAL ENGINEER

DATE: 11-16-01

APPROVED BY: Monty Zilly

TITLE: Environmental Budget

DATE: 11-26-01

3-109211

istrict I - (505) 393-6161  
O. Box 1980  
obbs, NM 88241-1980  
istrict II - (505) 748-1283  
I S. First  
esia, NM 88210  
istrict III - (505) 334-6178  
00 Rio Brazos Road  
ec, NM 87410  
istrict IV - (505) 827-7131

New Mexico  
Energy Minerals and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

Form C-138  
Originated 8/8/95

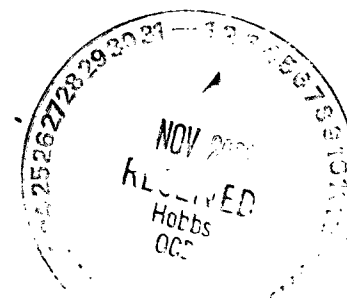
Submit Original  
Plus 1 Copy  
to appropriate  
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/>	4. Generator <i>EOT Energy Pipeline</i>
Verbal Approval Received: <sup>P</sup> <i>Sheeley</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5. Originating Site <i>Mark Battery #2</i>
2. Management Facility Destination <i>Environmental Plus, Inc.</i>	6. Transporter <i>EPI</i>
3. Address of Facility Operator <i>2100 Ave O Eunice NM</i>	8. State <i>NM</i>
7. Location of Material (Street Address or ULSTR) <i>ULG Sec 3 T22S R37E</i>	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. <i>see attached NMOC letter.</i> All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

*Crude oil contaminated soil.*



Estimated Volume *- 200* cy Known Volume (to be entered by the operator at the end of the haul) *12* cy

SIGNATURE: *Pat McCasland* TITLE: *Technical Manager* DATE: *8.29.01*  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: *PAT MCCASLAND* TELEPHONE NO. *505.394.3481*

(This space for State Use)

APPROVED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_ DATE: \_\_\_\_\_

APPROVED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_ DATE: \_\_\_\_\_

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: Uk-G Sec3 T225 R37E

Source: Crude Oil Pipeline, EOTV Energy Pipeline Mar K Battery #2

Disposal Location: Environmental Plus, Inc.

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for Enron Transportation Services concur with the status of the waste from the subject site.

Name Frank Hernandez

Title/Agency Enron Transportation Services

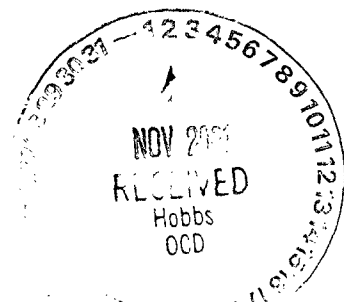
Address PO Box 1660  
Midland, TX 79703

Signature

Frank Hernandez

Date

8.29.01



**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

September 17, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-288-258-835**

Ms. Lennah Frost  
Environmental Engineer  
EOTT Energy  
P.O. Box 1660  
Midland, Texas 79702

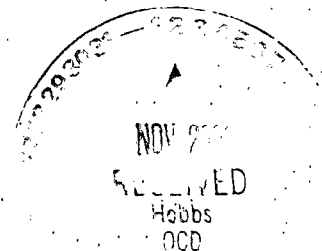
**RE: CRUDE OIL GATHERING SYSTEM SPILLS**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Operating Limited Partnership (EOTT) August 8, 1996 correspondence which presents the results of representative RCRA hazardous waste characteristic sampling of contaminated soils from pipeline related spills of crude oil. EOTT requests that they be allowed to use these analyses and a statement of process knowledge for determining the soils to be RCRA non-hazardous during future crude oil pipeline spill remediations. These analyses are to be used in lieu of individual sampling of each spill event.

The above referenced request is approved with the following conditions:

1. The above representative analyses can be used in lieu of individual sampling of each spill event.
2. EOTT will reference the above waste determination identified as "EOTT-DENTON-8896" in all future RCRA non-exempt crude oil spill reports to the OCD.
3. EOTT will notify the OCD within 24 hours of any system changes which could potentially alter the composition of any spilled crude such that RCRA hazardous waste characteristics in the spill area could be exceeded.



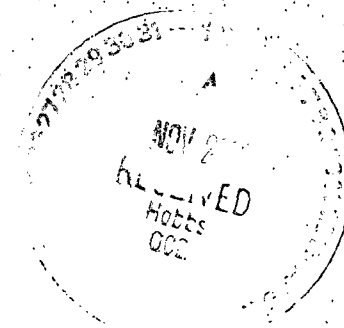
Ms. Lennah Frost  
September 17, 1996  
Page -2-

Please be advised that OCD approval does not relieve EOTT of liability should these types of leaks and spills result in actual contamination of surface waters, ground waters or the environment. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and/or regulations. If you have questions please contact me at (505) 827-7152.

Sincerely,

*Roger C. Anderson*  
Roger C. Anderson  
Environmental Bureau Chief

xc: OCD Artesia District Office  
Benito Garcia, NMED Hazardous and Radioactive Waste Bureau



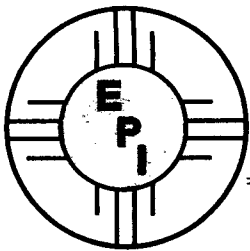
Is your RETURN ADDRESS completed on the reverse side?	<b>SENDER:</b> ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
	3. Article Addressed to: Ms Lennah Frost EOTT Emergency P.O. Box 1660 Midland Tx 79701		4a. Article Number P 285 285 835	
	5. Received By: (Print Name) Sherry S. Sunday		4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD	
	6. Signature: (Addressee or Agent) X		7. Date of Delivery SEP 25 1996	
			8. Addressee's Address (Only if requested and fee is paid)	

PS Form 3811, December 1994

Domestic Return Receipt

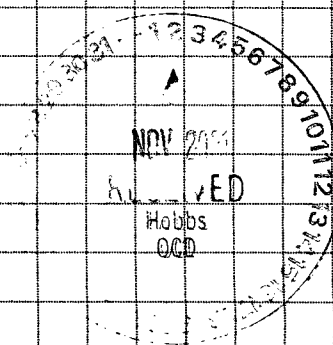
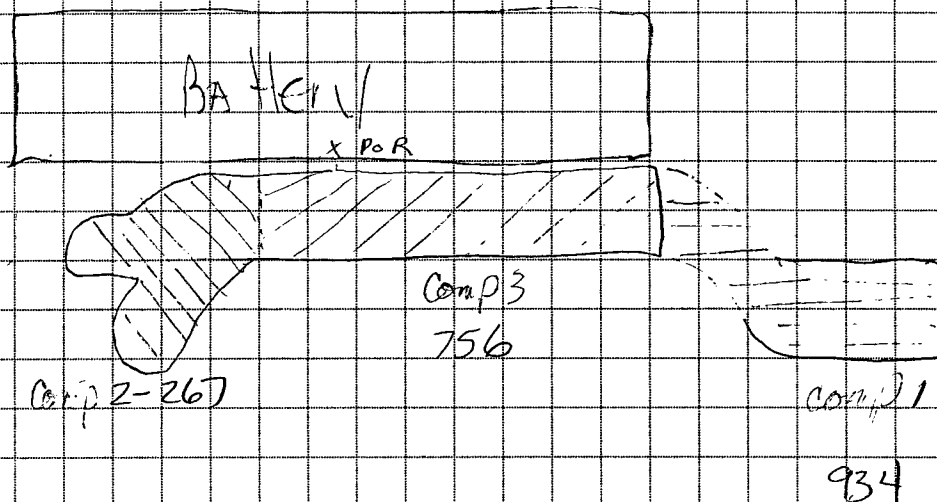
Thank you for using Return Receipt Service.





**ENVIRONMENTAL PLUS, INC.** *Micro-Blaze*  
**STATE APPROVED LAND FARM AND ENVIRONMENTAL SERVICES**

P.O. Box 1558 ... 1324 NORTH MAIN ... EUNICE, NEW MEXICO 88231  
TELEPHONE 505-394-3481 ... FAX 505-394-2601



District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505  
Environmental Bureau  
Oil Conservation Division

Form C-138  
Revised March 17, 1999

Submit Original  
Plus 1 Copy  
to Appropriate  
District Office

# REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/>	4. Generator <i>EOT Energy Pipeline</i>
Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <i>Chris Williams</i>	5. Originating Site <i>EOT Altura Hoover 6 "Gathering"</i>
2. Management Facility Destination <i>ENVIRONMENTAL PLUS, INC. (EPI)</i>	6. Transporter <i>EPI</i>
3. Address of Facility Operator <i>2100 Ave O, Eunice NM 88231</i>	8. State <i>NM</i>
7. Location of Material (Street Address or ULSTR) <i>UK-A Sec 5 T785 R36E</i>	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. <i>Refer to Attached NMOC <del>Waste</del> EOT Waste Characterization letter.</i> All transporters must certify the wastes delivered are only those consigned for transport.	

## BRIEF DESCRIPTION OF MATERIAL:

*Crude oil contaminated soil*

Estimated Volume 24 cy Known Volume (to be entered by the operator at the end of the haul) \_\_\_\_\_ cy

SIGNATURE *Pat McCasland* TITLE: *Technical Manager* DATE: \_\_\_\_\_  
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: *PAT MCCASLAND* TELEPHONE NO. *505-394-3481*

(This space for State Use)  
APPROVED BY: *Michael M. G. [Signature]* TITLE: *Environmental Eng.* DATE: *10-28-01*  
APPROVED BY: *Justin J. [Signature]* TITLE: *Environmental Geology* DATE: *11-05-01*

1105-01-1

CERTIFICATE OF WASTE STATUSNON-EXEMPT WASTE MATERIALOriginating Location: UL-A Sec 5 T10S R36ESource: Crude oil Pipeline - EOTT Energy Pipeline Altura Haver 6 "Disposal Location: Environmental Plus, Inc.

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for Enron Transportation Services concur with the status of the waste from the subject site.

Name Frank HernandezTitle/Agency Enron Transportation ServicesAddress PO Box 1660  
Midland, TX 79703Signature Frank HernandezDate 8.29.01



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

September 17, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-288-258-835**

Ms. Lennah Frost  
Environmental Engineer  
EOTT Energy  
P.O. Box 1660  
Midland, Texas 79702

**RE: CRUDE OIL GATHERING SYSTEM SPILLS**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Operating Limited Partnership (EOTT) August 8, 1996 correspondence which presents the results of representative RCRA hazardous waste characteristic sampling of contaminated soils from pipeline related spills of crude oil. EOTT requests that they be allowed to use these analyses and a statement of process knowledge for determining the soils to be RCRA non-hazardous during future crude oil pipeline spill remediations. These analyses are to be used in lieu of individual sampling of each spill event.

The above referenced request is approved with the following conditions:

1. The above representative analyses can be used in lieu of individual sampling of each spill event.
2. EOTT will reference the above waste determination identified as "EOTT-DENTON-8896" in all future RCRA non-exempt crude oil spill reports to the OCD.
3. EOTT will notify the OCD within 24 hours of any system changes which could potentially alter the composition of any spilled crude such that RCRA hazardous waste characteristics in the spill area could be exceeded.

*Denton 8896 - Gathering Station (Armed Coring)*  
*Lea Station Enrike*  
*Livingston Ridge Whip to Lea Station*

*Buckley*

FEB-19-01 MON 04:59 PM

P.03

Ms. Lennah Frost  
September 17, 1996  
Page -2-

Please be advised that OCD approval does not relieve EOTT of liability should these types of leaks and spills result in actual contamination of surface waters, ground waters or the environment. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and/or regulations. If you have questions please contact me at (505) 827-7152.

Sincerely,



Roger C. Anderson  
Environmental Bureau Chief

xc: OCD Artesia District Office  
Benito Garcia, NMED Hazardous and Radioactive Waste Bureau

<b>SENDER:</b> # Complete items 1 and/or 2 for additional services. # Complete items 3, 4a, and 4b. # Print your name and address on the reverse of this form so that we can return this card to you. # Attach this form to the front of the mailpiece, or on the back if space does not permit. # Write "Return Receipt Requested" on the mailpiece below the article number. # The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Ms Lennah Frost EOTT Emergency P.O. Box 1660 Midland Tx 79702		4a. Article Number P 285 285 835	
5. Received By: (Print Name) Sharon S. Sunday		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Return Receipt for Merchandise <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Insured <input type="checkbox"/> COD	
6. Signature: (Addressee or Agent) X		7. Date of Delivery SEP 25 1996	
PS Form 3811, December 1994		8. Addressee's Address (Only if requested and fee is paid)	

Is your RETURN ADDRESS completed on the reverse side?

The ink you are using Return Receipt Service.

Domestic Return Receipt

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-138  
Revised March 17, 1999

Submit Original  
Plus 1 Copy  
to Appropriate  
District Office

### REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/>	4. Generator <i>EOTT</i>
Verbal Approval Received: Yes <input type="checkbox"/> No <input type="checkbox"/>	5. Originating Site
2. Management Facility Destination <i>Environmental Plus, Inc.</i>	6. Transporter <i>Environmental Plus, Inc.</i>
3. Address of Facility Operator <i>3 miles S. of Eunice, PO Box 1558 Eunice NM 88231</i>	8. State <i>NM</i>
7. Location of Material (Street Address or ULSTR) <i>UK-B Sewer T125 R31E</i>	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. <input checked="" type="radio"/> B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

#### BRIEF DESCRIPTION OF MATERIAL:

*Crude oil contaminated soil*

RECEIVED

AUG 16 2001

Environmental Bureau  
Oil Conservation Division

Estimated Volume 12 cy Known Volume (to be entered by the operator at the end of the haul) \_\_\_\_\_ cy

SIGNATURE *Pat McCasland* TITLE: *Technical Mgr* DATE: 8-15-01  
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: PAT MCCASLAND TELEPHONE NO. 505.394.3481

(This space for State Use)

APPROVED BY: *Logan* TITLE: *Bureau Chief* DATE: 8/29/01  
APPROVED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_ DATE: \_\_\_\_\_

CERTIFICATE OF WASTE STATUSNON-EXEMPT WASTE MATERIALOriginating Location: E.O.T.T. Turner "B" North ReceiverSource: Crude Oil Pipeline : UL-B sec. 18 T125 B31EDisposal Location: Environmental Plus, Inc. Landfarm

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for Enron Transportation Services concur with the status of the waste from the subject site.

Name Frank HernandezTitle/Agency Enron Transportation ServicesAddress PO Box 1660  
Midland, TX, 79703Signature Frank HernandezDate 8-15-01

FEB-19-01 MON 04:59 PM

P. 02

**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT****OIL CONSERVATION DIVISION**  
2060 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

September 17, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-288-258-835**

Ms. Lennah Frost  
Environmental Engineer  
EOTT Energy  
P.O. Box 1660  
Midland, Texas 79702

**RE: CRUDE OIL GATHERING SYSTEM SPILLS**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Operating Limited Partnership (EOTT) August 8, 1996 correspondence which presents the results of representative RCRA hazardous waste characteristic sampling of contaminated soils from pipeline related spills of crude oil. EOTT requests that they be allowed to use these analyses and a statement of process knowledge for determining the soils to be RCRA non-hazardous during future crude oil pipeline spill remediations. These analyses are to be used in lieu of individual sampling of each spill event.

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2. EOTT will reference the above waste determination identified as "EOTT-DENTON-8896" in all future RCRA non-exempt crude oil spill reports to the OCD.
3. EOTT will notify the OCD within 24 hours of any system changes which could potentially alter the composition of any spilled crude such that RCRA hazardous waste characteristics in the spill area could be exceeded.



Ms. Lennah Frost  
September 17, 1996  
Page -2-

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Sincerely,

  
Roger C. Anderson  
Environmental Bureau Chief

xc: OCD Artesia District Office  
Benito Garcia, NMED Hazardous and Radioactive Waste Bureau

<b>SENDER:</b> ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Mrs. Lennah Frost EOTT Energy P.O. Box 1660 Midland Tx 79701		4a. Article Number P 285 285 835	
4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD		7. Date of Delivery SEP 25 1996	
5. Received By: (Print Name) Sherry Sunday		8. Addressee's Address (Only if requested and fee is paid)	
6. Signature: (Addressee or Agent) X			

Is your RETURN ADDRESS completed on the reverse side?

PS Form 3811, December 1994 Domestic Return Receipt

The nk you for using Return Receipt Service.

District I - (505) 393-6161  
P.O. Box 1980  
Hobbs, NM 88241-1980  
District II - (505) 748-1283  
811 S. First  
Artesia, NM 88210  
District III - (505) 334-6178  
1000 Rio Brazos Road  
Aztec, NM 87410  
District IV - (505) 827-7131

New Mexico  
Energy Minerals and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

Form C-138  
Originated 8/8/9

Submit Origin:  
Plus 1 Cop  
to appropriate  
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	4. Generator <u>EOTT Lynch Station</u>
2. Management Facility Destination <u>Environment Plus, Inc. LANDFARM</u>	5. Originating Site <u>ULB Sec 34 T20S R34E</u>
3. Address of Facility Operator <u>1324 N. Main, Eunice, NM 88231</u>	6. Transporter <u>ENVIRONMENTAL PLUS, INC.</u>
7. Location of Material (Street Address or ULSTR) <u>ULB 534 T20S R34E</u>	8. State <u>New Mexico</u>
9. <u>Circle One:</u> A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. <u>(B)</u> All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.  All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Crude oil contaminated soil from pipeline leak inside the Lynch Station area.

Estimated Volume 800 cy Known Volume (to be entered by the operator at the end of the haul) 784 lbs cy

SIGNATURE: [Signature] TITLE: Technical Manager DATE: 6-12-01  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: PAT McCASLAND TELEPHONE NO. 505-394-3481

(This space for State Use)

APPROVED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_ DATE: \_\_\_\_\_  
APPROVED BY: [Signature] TITLE: Environmental Codes & T DATE: 6-12-01

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: W B Sec 34 T20S R34E  
Source: Pipeline EOT Lynch Station  
Disposal Location: Environmental Plus, Inc. Land Farm

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for Enron Transportation Services concur with the status of the waste from the subject site.

Name Frank Hernandez

Title/Agency Enron Transportation Services

Address PO Box 1660  
Midland, TX 79703

Signature Frank Hernandez

Date 6.12.01

E.O.T.T.  
ENERGY PIPELINE  
LYNCH STATION  
AFFECTED AREA  
~ 34,100 SQFT

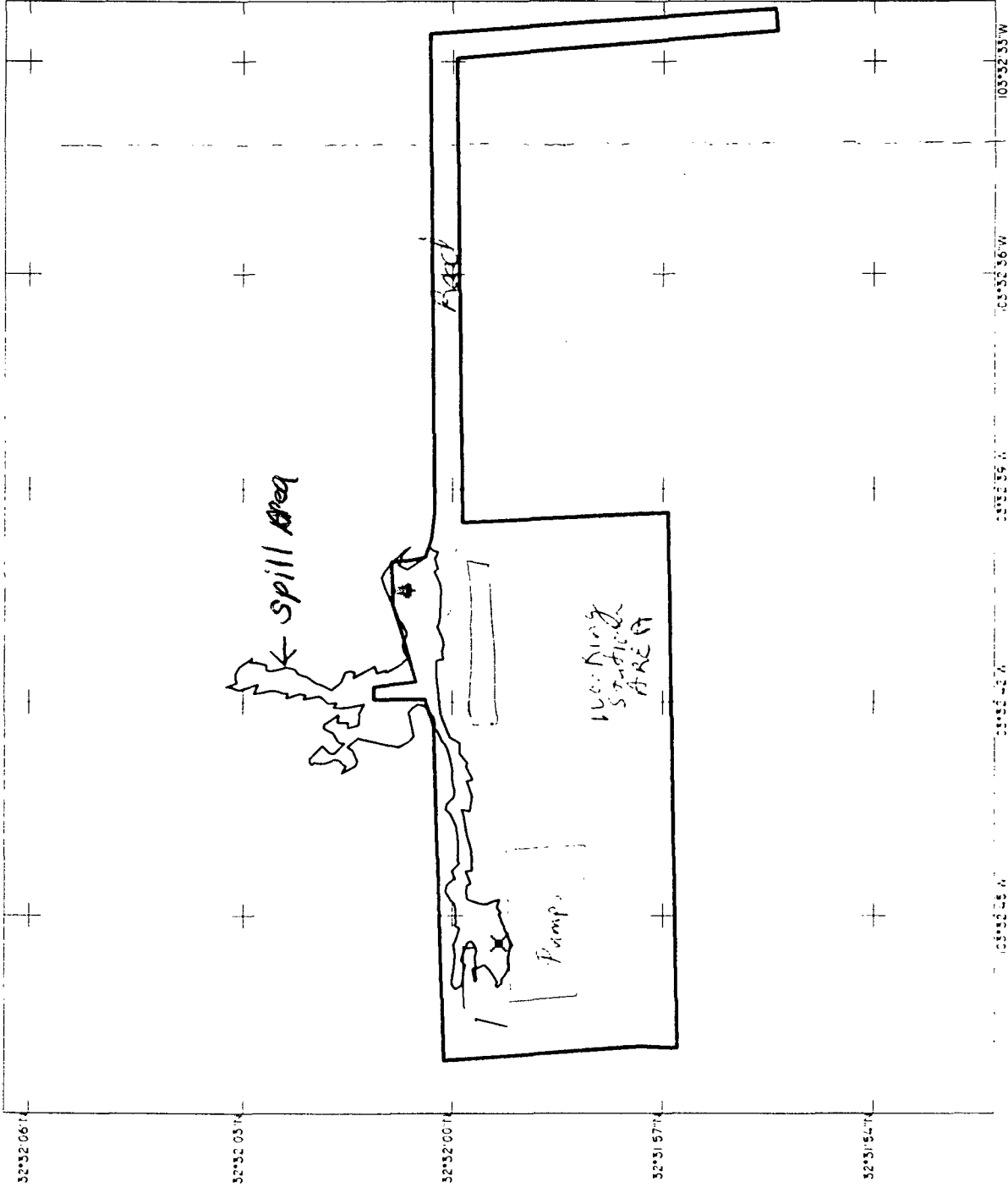
N ↑

SCALE 1 IN : 200 FT



LAT/LONG  
NAD 1927 (WESTERN US)


R060613A.SSF  
6/7/2001



Ms. Lennah Frost  
 September 17, 1996  
 Page -2-

Please be advised that OCD approval does not relieve EOTT of liability should these types of leaks and spills result in actual contamination of surface waters, ground waters or the environment. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and/or regulations. If you have questions please contact me at (505) 827-7152.

Sincerely,



Roger C. Anderson  
 Environmental Bureau Chief

xc: OCD Artesia District Office  
 Benito Garcia, NMED Hazardous and Radioactive Waste Bureau

Is your RETURN ADDRESS completed on the reverse side?	<b>SENDER:</b> ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.		
	3. Article Addressed to: Ms Lennah Frost EOTT Emergency P.O. Box 1660 Midland Tx 79702		4a. Article Number P 288 285 835		
	5. Received By: (Print Name) Sherry L. Sunday		4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD		
	6. Signature: (Addressee or Agent) X		7. Date of Delivery SEP 25 1996		
		8. Addressee's Address (Only if requested and fee is paid)		Thank you for using Return Receipt Service.	
PS Form 3811, December 1994				Domestic Return Receipt	

1324 North Main Street  
P.O. Box 1558  
Eunice, New Mexico 88231  
TEL: 505.394.3481  
FAX: 505.394.2601

# Fax



## Micro-Blaze

**To:** Martyne Keiling

**From:** Pat McCasland

**Fax:** 505.476.3462

**Pages:** 5

**Phone:** 505.476.3488

**Date:** 6/12/2001

**Re:** EOTT Lynch C-138

**CC:** Paul Sheekey NMCO Hobbs NM  
505.393.0720

☐ Urgent

☐ For Review

☐ Please Comment

☐ Please Reply

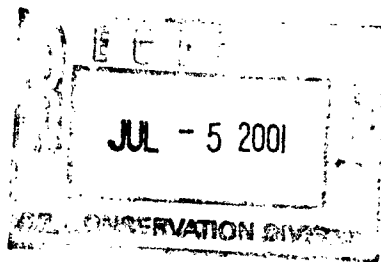
☐ Please Recycle

Martyne,

Attached is the C-138 and supporting documentation for the EOTT Lynch Station Soil to be disposed of in the EPI landfarm. I look forward to your response.

*The leak is not associated with a pump area.*

Pat McCasland



**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

September 17, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-288-258-835**

Ms. Lennah Frost  
Environmental Engineer  
EOTT Energy  
P.O. Box 1660  
Midland, Texas 79702

**RE: CRUDE OIL GATHERING SYSTEM SPILLS**

Dear Ms. Frost:

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07/18/01 WED 08:51 FAX 5053942801  
Box 1980  
Hobbs, NM 88241-1980  
District II - (505) 748-1283  
811 S. First  
Artesia, NM 88210  
District III - (505) 334-6178  
1000 Rio Brazos Road  
Aztec, NM 87410  
District IV - (505) 827-7131

EPI...  
Energy Minerals and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

0002  
Form C-1  
Originated 8/8

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District Off

NOV 26 2001

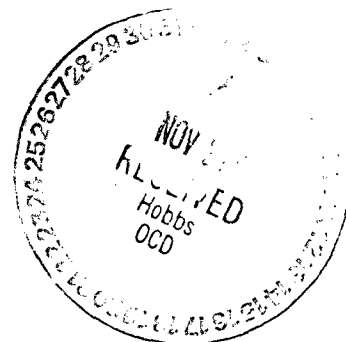
Environmental Bureau  
Oil Conservation Division

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/>	4. Generator <u>EOT</u>
Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5. Originating Site <u>L. Livingston</u> <u>L. L. (LINE)</u>
2. Management Facility Destination <u>Environmental Plus Inc. (EPI)</u>	6. Transporter <u>EPI</u>
3. Address of Facility Operator <u>3 miles south Eunice</u>	8. State <u>NM</u>
7. Location of Material (Street Address or ULSTR) <u>Box 56 T215 R37E</u>	Lat <u>N 32° 30' 12"</u> Long <u>W 103° 08' 55"</u>
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. <u>Refer to attached letter.</u>  All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Crude oil contaminated soil.



Estimated Volume 250 cy Known Volume (to be entered by the operator at the end of the haul) 148 cy

SIGNATURE: [Signature] TITLE: Technical Manager DATE: 7.17.01  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: Pat McCasland TELEPHONE NO. 505-394-3481

(This space for State Use)  
APPROVED BY: [Signature] TITLE: ENVIRONMENTAL ENGINEER DATE: 11-16-01  
APPROVED BY: [Signature] TITLE: Environmental Geologist DATE: 7-18-01



P.O. Box 1980  
Hobbs, NM 88241-1980  
District II - (505) 748-1283  
841 S. First  
Artesia, NM 88210  
District III - (505) 334-6178  
1000 Rio Brazos Road  
Aztec, NM 87410  
District IV - (505) 827-7131

Energy Minerals and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

Form C-1  
Originated 8/8

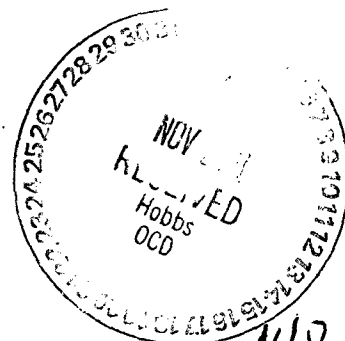
Submit Orig  
Plus 1 C  
to appropn  
District Off

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/>	4. Generator <u>EOH</u>
Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5. Originating Site <u>Livingston</u>
2. Management Facility Destination <u>Environmental Plus Inc. (EPI)</u>	6. Transporter <u>EPI</u>
3. Address of Facility Operator <u>3 miles South Eunice</u>	8. State <u>NM</u>
7. Location of Material (Street Address or ULSTR) <u>SE 56 T21S R37E</u>	Lat <u>N 32° 30' 12"</u> Long <u>W 103° 08' 55"</u>
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BRIEF DESCRIPTION OF MATERIAL:

Crude oil contaminated soil.



Estimated Volume 250 cy Known Volume (to be entered by the operator at the end of the haul) 148 cy

SIGNATURE: [Signature] TITLE: Technical Manager DATE: 2.17.01  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: Pat McCasland TELEPHONE NO. 505-394-3481

(This space for State Use)

APPROVED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_ DATE: \_\_\_\_\_  
APPROVED BY: [Signature] TITLE: Environmental Geologist DATE: 7-18-01

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: EOT Energy Pipeline Livingstone Line - G.P.S. m  
Source: SE/4 Section 6 T21S R37E  
Disposal Location: Environmental Plus Inc

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I, the undersigned as the agent for Enron Transportation Services concur with the status of the waste from the subject site.

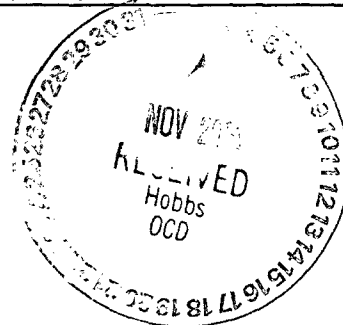
Name Frank Hernandez

Title/Agency Enron Transportation Services

Address PO Box 1660  
Midland, TX, 79703

Signature Frank Hernandez

Date 7-17-01





NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

September 17, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-288-258-835**

Ms. Lennah Frost  
Environmental Engineer  
EOTT Energy  
P.O. Box 1660  
Midland, Texas 79702

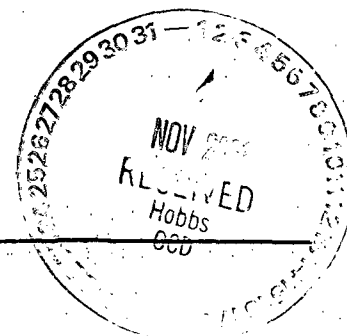
**RE: CRUDE OIL GATHERING SYSTEM SPILLS**

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Ms. Lennah Frost  
September 17, 1996  
Page -2-

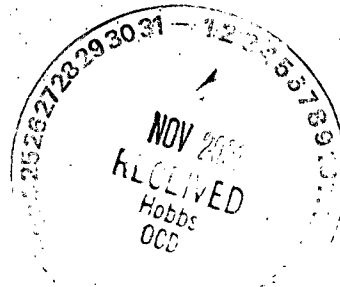
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Sincerely,



Roger C. Anderson  
Environmental Bureau Chief

xc: OCD Artesia District Office  
Benito Garcia, NMED Hazardous and Radioactive Waste Bureau



<p>Is your RETURN ADDRESS completed on the reverse side?</p>	<p><b>SENDER:</b></p> <ul style="list-style-type: none"> <li>Complete items 1 and/or 2 for additional services.</li> <li>Complete items 3, 4a, and 4b.</li> <li>Print your name and address on the reverse of this form so that we can return this card to you.</li> <li>Attach this form to the front of the mailpiece, or on the back if space does not permit.</li> <li>Write "Return Receipt Requested" on the mailpiece below the article number.</li> <li>The Return Receipt will show to whom the article was delivered and the date delivered.</li> </ul>		<p>I also wish to receive the following services (for an extra fee):</p> <p>1. <input type="checkbox"/> Addressee's Address</p> <p>2. <input type="checkbox"/> Restricted Delivery</p> <p>Consult postmaster for fee.</p>
	<p>3. Article Addressed to:</p> <p>Ms Lennah Frost EOTT Emergency P.O. Box 1660 Midland Tx 79702</p>		<p>4a. Article Number</p> <p>P 285 285 835</p>
	<p>4b. Service Type</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified</p> <p><input type="checkbox"/> Express Mail <input type="checkbox"/> Insured</p> <p><input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD</p>		<p>7. Date of Delivery</p> <p>SEP 25 1996</p>
	<p>5. Received By: (Print Name)</p> <p>Sherry Sunday</p>		<p>8. Addressee's Address (Only if requested and fee is paid)</p>
<p>6. Signature: (Addressee or Agent)</p> <p>X</p>			
<p>PS Form 3811, December 1994</p>			

Domestic Return Receipt

Thank you for using Return Receipt Service.

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District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-138  
Revised March 17, 1999

Submit Original  
Plus 1 Copy  
to Appropriate  
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/>	4. Generator EOTT
Verbal Approval Received: Yes <input type="checkbox"/> No <input type="checkbox"/>	5. Originating Site Hugh Station
2. Management Facility Destination Environmental Plus, Inc.	6. Transporter Environmental Plus
3. Address of Facility Operator 3mi South of Eunice on SR 18	8. State NM
7. Location of Material (Street Address or ULSTR) Sec 14 T22S R37E	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Crude Oil contaminated soil from around the Hugh Station pump and piping.

Estimated Volume 12 cy Known Volume (to be entered by the operator at the end of the haul) 164.5 cy

SIGNATURE [Signature] TITLE: Technical Manager DATE: \_\_\_\_\_  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: PAT McCASLAND TELEPHONE NO. 505.394.3481

(This space for State Use)

APPROVED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_ DATE: \_\_\_\_\_  
APPROVED BY: [Signature] TITLE: Environmental Geologist DATE: 5-17-01

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: Sec 14 T225 R37E  
Source: EON ENERGY Pipeline Hugh Station  
Disposal Location: Environmental Plus Inc.

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for Enron Transportation Services concur with the status of the waste from the subject site.

Name Frank Hernandez

Title/Agency Enron Transportation Services

Address PO Box 1660  
Midland, TX, 79703

Signature Frank Hernandez

Date 5.16.01

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT ENERGY  
ATTN: MR. FRANK HERNANDEZ  
P.O. BOX 5050  
HOBBS, N.M. 88240  
FAX: 505-392-2946  
FAX: 505-394-2601 (Pat McCasland)

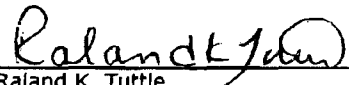
Sample Type: Soil  
Sample Condition: Intact/ Iced/ 4 deg C  
Project #: 20010437  
Project Name: EOTT Hugh Batt  
Project Location: Sec 14 T22S R37 E

Sampling Date: 05/08/01  
Receiving Date: 05/08/01  
Analysis Date: 05/11/01

ELT#	FIELD CODE	TCLP BENZENE mg/L	TCLP TOLUENE mg/L	TCLP ETHYLBENZENE mg/L	TCLP m,p-XYLENE mg/L	TCLP o-XYLENE mg/L
40065	SHBE5801SP	0.035	0.438	0.234	0.727	0.362

%IA	86	86	90	95	88
%EA	92	107	112	109	111
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025

METHODS: EPA SW 846-1311, 8021B ,5030

  
Roland K. Tuttle

5-16-01  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT ENERGY  
ATTN: MR. FRANK HERNANDEZ  
P.O. BOX 5050  
HOBBS, N.M. 88240  
FAX: 505-392-2946  
FAX: 505-394-2600 (Pat McCasland)

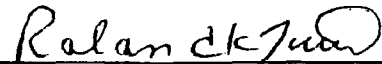
Sample Type: Soil  
Sample Condition: Intact/ Iced/ 4 deg. C  
Project #: 20010437  
Project Name: EOTT Hugh Batt  
Project Location: Sec 14 T22S R37E

Sampling Date: 05/08/01  
Receiving Date: 05/08/01  
Analysis Date: 05/08/01

ELT#	FIELD CODE	GRO	DRO
		C6-C10 mg/kg	>C10-C28 mg/kg
40065	SHBE5801SP	4088	11709

%IA	96	113
%EA	97	109
BLANK	<10	<10

METHODS: SW 846-8015M

  
Ralanda K. Tuttle

5-16-01  
Date



## CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

FRANK HERNANDEZ

100

Project Loc: Sec 14 T22S R37E

PO:

415-638-3799

Fax No

body mill

May 16 01 08:20a

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT ENERGY  
ATTN: MR. FRANK HERNANDEZ  
P.O. BOX 5050  
HOBBS, N.M. 88240  
FAX: 505-392-2946  
FAX: 505-394-2601 (Pat McCasland)

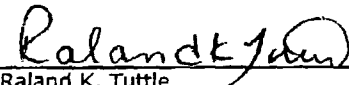
Sample Type: Soil  
Sample Condition: Intact/ Iced/ 4 deg C  
Project #: 20010437  
Project Name: EOTT Hugh Batt  
Project Location: Sec 14 T22S R37 E

Sampling Date: 05/08/01  
Receiving Date: 05/08/01  
Analysis Date: 05/11/01

ELT#	FIELD CODE	TCLP BENZENE mg/L	TCLP TOLUENE mg/L	TCLP ETHYLBENZENE mg/L	TCLP m,p-XYLENE mg/L	TCLP o-XYLENE mg/L
40065	SHBE5801SP	0.035	0.438	0.234	0.727	0.362

%IA	86	86	90	95	88
%EA	92	107	112	109	111
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025

METHODS: EPA SW 846-1311, 8021B ,5030

  
Raland K. Tuttle

5-16-01  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT ENERGY  
ATTN: MR. FRANK HERNANDEZ  
P.O. BOX 5050  
HOBBS, N.M. 88240  
FAX: 505-392-2946  
FAX: 505-394-2600 (Pat McCasland)

Sample Type: Soil  
Sample Condition: Intact/ Iced/ 4 deg. C  
Project #: 20010437  
Project Name: EOTT Hugh Batt  
Project Location: Sec 14 T22S R37E

Sampling Date: 05/08/01  
Receiving Date: 05/08/01  
Analysis Date: 05/08/01


ELT#	FIELD CODE	GRO	DRO
		C6-C10 mg/kg	>C10-C28 mg/kg
40065	SHBE5801SP	4088	11709

%IA  
%EA  
BLANK

96  
97  
<10

113  
109  
<10

METHODS: SW 846-8015M

  
Raland K. Tuttle

5-16-01  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT ENERGY  
ATTN: MR. FRANK HERNANDEZ  
P.O. BOX 5050  
HOBBS, N.M. 88240  
FAX: 505-392-2946  
FAX: 505-394-2600 (Pat McCasland)

Sample Type: Soil  
Sample Condition: Intact/ Iced/ 4 deg C  
Project #: 20010437  
Project Name: EOTT Hugh Batt  
Project Location: Sec14 T22S R37E

Sampling Date: 05/08/01  
Receiving Date: 05/08/01  
Analysis Date: 05/15/01  
Analysis Date: Hg 05/14/01

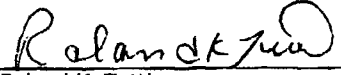
## TCLP METALS (mg/L)

ELT#	Field Code	Ag	As	Ba	Cd	Cr	Hg	Pb	Se
40065	SHBE5801SP	ND	ND	0.8762	ND	0.0107	ND	ND	0.0056

REPORT LIMIT	0.002	0.008	0.001	0.001	0.002	0.002	0.011	0.004
% IA	95	102	100	102	102	101	101	102
% EA	107	118	107	114	98	106	111	124
BLANK	<0.002	<0.008	<0.001	<0.001	<0.002	<0.002	<0.011	<0.004

ND= Not detected at report limit.

METHODS: EPA SW 846-1311, 3010, 7470, 6010B

  
Roland K. Tuttle

5-16-01  
Date

12600 West I-20 East  
Odessa, Texas 79763

Phone: 915-563-1800  
Fax: 915-563-1713

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

FRANK HERNANDEZ

五

Project Location:

Sec 14 T225 R37E

PO#

915-638-3799

For NG

Cozy Mills

[illegible]

1324 North Main Street  
P.O. Box 1558  
Eunice, New Mexico 88231  
TEL: 505.394.3481  
FAX: 505.394.2601

## ENVIRONMENTAL PLUS, INC.

# Fax



### Micro-Blaze

**To:** Martyne Kieling / NMOCD

**From:** Pat McCasland

**Fax:** 505.476.3462

**Pages:** 7

**Phone:** 505.476.3488

**Date:** 5/16/2001

**Re:** C-138 Transmittal EOTT Hugh Station

**CC:** Paul Sheeley 505.393.0720

☐ **Urgent**    ☐ **For Review**    ☐ **Please Comment**    ☐ **Please Reply**    ☐ **Please Recycle**

**Ms. Kieling,**

Attached herewith are hazardous characterization analyses for the contaminated soil from the EOTT Hugh Station. The C-138 and supporting documentation for receipt of "non-exempt" crude oil contaminated soil into the EPI landfarm are also attached. The original will be completed and forwarded to you when the project is completed.

Sincerely,

Pat McCasland

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-138  
Revised March 17, 1999

Submit Original  
Plus 1 Copy  
to Appropriate  
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <i>mk</i>	4. Generator <i>EOTE Energy Pipeline</i> 5. Originating Site <i>SW 1/4 T21S R37E</i> <i>Don Jones Turner Pump</i> <i>Sec 23</i>
2. Management Facility Destination <i>Environmental Plus, Inc.</i> <i>3 miles South of Eunice NM</i>	6. Transporter <i>Environmental Plus, Inc.</i>
3. Address of Facility Operator <i>1324 Main Street, P.O. Box 1558, Eunice NM 88231</i>	8. State <i>NM</i>
7. Location of Material (Street Address or ULSR) <i>SW 1/4 Sec 23 T21S R37E</i>	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

*Crude oil contaminated soil*

Estimated Volume *~400* cy Known Volume (to be entered by the operator at the end of the haul) *2096 yds* cy

SIGNATURE *[Signature]* TITLE: *Technical Manager* DATE: *4.3.01*  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: *PAT McCASLAND* TELEPHONE NO. *505.394.3481*

(This space for State Use)

APPROVED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_ DATE: \_\_\_\_\_  
APPROVED BY: *Martyn J. Kelly* TITLE: *Environmental Geologist* DATE: *6-8-01*

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: SW/4 Sec 23 T21S R37E

Source: EOT Energy Pipeline - Don Jones Turner Pump

Disposal Location: Environmental Plus, Inc.

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for EOT Energy Pipeline  
concur with the status of the waste from the subject site.

Name Frank Hernandez

Title/Agency D.E.S

Address P.O. Box 1110  
Midland, Texas 79703

Signature Frank Hernandez

Date 4-4-01





**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

September 17, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-288-258-835**

Ms. Lennah Frost  
Environmental Engineer  
EOTT Energy  
P.O. Box 1660  
Midland, Texas 79702

**RE: CRUDE OIL GATHERING SYSTEM SPILLS**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Operating Limited Partnership (EOTT) August 8, 1996 correspondence which presents the results of representative RCRA hazardous waste characteristic sampling of contaminated soils from pipeline related spills of crude oil. EOTT requests that they be allowed to use these analyses and a statement of process knowledge for determining the soils to be RCRA non-hazardous during future crude oil pipeline spill remediations. These analyses are to be used in lieu of individual sampling of each spill event.

The above referenced request is approved with the following conditions:

1. The above representative analyses can be used in lieu of individual sampling of each spill event.
2. EOTT will reference the above waste determination identified as "EOTT-DENTON-8896" in all future RCRA non-exempt crude oil spill reports to the OCD.
3. EOTT will notify the OCD within 24 hours of any system changes which could potentially alter the composition of any spilled crude such that RCRA hazardous waste characteristics in the spill area could be exceeded.

Ms. Lennah Frost  
September 17, 1996  
Page -2-

Please be advised that OCD approval does not relieve EOTT of liability should these types of leaks and spills result in actual contamination of surface waters, ground waters or the environment. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and/or regulations. If you have questions please contact me at (505) 827-7152.

Sincerely,



Roger C. Anderson  
Environmental Bureau Chief

xc: OCD Artesia District Office  
Benito Garcia, NMED Hazardous and Radioactive Waste Bureau

Is your RETURN ADDRESS completed on the reverse side?	<b>SENDER:</b>		Thank you for using Return Receipt Service.	
	<input type="checkbox"/> Complete items 1 and/or 2 for additional services. <input type="checkbox"/> Complete items 3, 4a, and 4b. <input type="checkbox"/> Print your name and address on the reverse of this form so that we can return this card to you. <input type="checkbox"/> Attach this form to the front of the mailpiece, or on the back if space does not permit. <input type="checkbox"/> Write "Return Receipt Requested" on the mailpiece below the article number. <input type="checkbox"/> The Return Receipt will show to whom the article was delivered and the date delivered.			I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
	3. Article Addressed to:			4a. Article Number
	Ms. Lennah Frost EOTT Emergency P.O. Box 1660 Midland Tx 79702			P 288 255 835 4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD
	5. Received By: (Print Name)			7. Date of Delivery
Sherry S. Sunday 6. Signature: (Addressee or Agent) X		8. Addressee's Address (Only if requested and fee is paid)	SEP 25 1996	
PS Form 3811, December 1994				
Domestic Return Receipt				

District I  
1625 N. French Dr., Hobbs, NM 88240  
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811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-138  
Revised March 17, 1999

Submit Original  
Plus 1 Copy  
to Appropriate  
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/>	4. Generator EOTT
Verbal Approval Received: Yes <input type="checkbox"/> No <input type="checkbox"/>	5. Originating Site Exxon U.S. 4" line
2. Management Facility Destination Environmental Plus, Inc.	6. Transporter Environmental Plus, Inc.
3. Address of Facility Operator 3 mile south Eunice NM on NMSR 18	8. State NM
7. Location of Material (Street Address or ULSTR) SW/4 Sec 10 T21S R37E	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. (B) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved "EOTT - Denton-8896" waste determination. Letter attached. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Crude oil contaminated soil.

Estimated Volume 175 cy Known Volume (to be entered by the operator at the end of the haul) 168 yds cy

SIGNATURE [Signature] TITLE: Technical Manager DATE: 5.4.01  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: Pat McCasland TELEPHONE NO. 505.394.3481

(This space for State Use)

APPROVED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_ DATE: \_\_\_\_\_  
APPROVED BY: [Signature] TITLE: Environmental Geologist DATE: 5-4-01

# E. P. I., INC.

## CERTIFICATE OF WASTE STATUS

### NON-EXEMPT WASTE MATERIAL

Originating Location: EOT Energy Pipeline  
Source: Exxon "U" State 4" Line SW/4 Sec 10 T21S R37E  
Disposal Location: Environmental Plus, Inc.

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for EOT Energy Pipeline  
concur with the status of the waste from the subject site

Name FRANK Hernandez  
Title/Agency EOT / Environmental Manager <sup>D.E.S.</sup>  
Address P.O. Box 1660  
Midland, Texas 79703  
Signature Frank Hernandez  
Date 5-4-01

**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

September 17, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-288-258-835**

Ms. Lennah Frost  
Environmental Engineer  
EOTT Energy  
P.O. Box 1660  
Midland, Texas 79702

**RE: CRUDE OIL GATHERING SYSTEM SPILLS**

Dear Ms. Frost:

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The above referenced request is approved with the following conditions:

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2. EOTT will reference the above waste determination identified as "EOTT-DENTON-8896" in all future RCRA non-exempt crude oil spill reports to the OCD.
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Ms. Lennah Frost  
September 17, 1996  
Page -2-

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Sincerely,



Roger C. Anderson  
Environmental Bureau Chief

xc: OCD Artesia District Office  
Benito Garcia, NMED Hazardous and Radioactive Waste Bureau

Is your RETURN ADDRESS completed on the reverse side?	<b>SENDER:</b> ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
	3. Article Addressed to: Ms Lennah Frost EOTT Energy P.O. Box 1660 Midland Tx 79702		4a. Article Number P 288 285 835	
	5. Received By: (Print Name) Sherry L. Sunday		4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD	
	6. Signature: (Addressee or Agent) X		7. Date of Delivery SEP 25 1996	
			8. Addressee's Address (Only if requested and fee is paid)	
PS Form 3811, December 1994				

Domestic Return Receipt

Thank you for using Return Receipt Service.

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State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-138  
Revised March 17, 1999

Submit Original  
Plus 1 Copy  
to Appropriate  
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	4. Generator <i>EOTT ENERGY PIPELINE</i> 5. Originating Site <i>EOTT CONTRACT 19-4"</i>
2. Management Facility Destination <i>Environmental Plus, Inc. Landfill</i>	6. Transporter <i>Environmental Plus, Inc.</i>
3. Address of Facility Operator <i>3 mi South of Eunice on SR 18 P.O. Box 1558, Eunice, NM 88231</i>	8. State <i>NM</i>
7. Location of Material (Street Address or ULSTR) <i>Unit M Sec 2 T21S R37E</i>	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. <input checked="" type="radio"/> B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Crude oil contaminated soil. Reference NMDCO Letter (attached) dated 9-17-96 in lieu of hazardous characterization, i.e., soil is RCRA non-hazardous based on Process Knowledge & historical analyses.

Estimated Volume 60 cy Known Volume (to be entered by the operator at the end of the haul) 84 cy

SIGNATURE *Pat McCasland* TITLE: *Technical Manager* DATE: *3.12.01*  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: *PAT MCCASLAND* TELEPHONE NO. *505.394.3481*

(This space for State Use)

APPROVED BY: *Martyn J Kelly* TITLE: *Environmental Geologist* DATE: *4-2-01*  
APPROVED BY: *Martyn J Kelly* TITLE: *Environmental Geologist* DATE: *4-2-01*

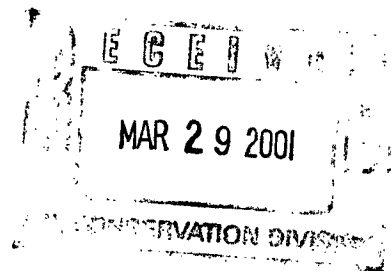


**ENVIRONMENTAL PLUS, INC.**

**STATE APPROVED LAND FARM AND ENVIRONMENTAL SERVICES**

*Micro-Blaze*

*Micro-Blaze Out™*



March 26, 2001

Ms. Martyne Kieling  
Oil Conservation Division  
P.O. Box 6429  
1220 S. Saint Francis Drive  
Santa Fe, New Mexico 87505

Subject: E.O.T.T. CDU Tract 19-4" Non-exempt/non-hazardous soil Disposal documentation.

Dear Ms. Kieling,

During the week of March 12, 2001, Environmental Plus, Inc. (EPI) received verbal authorization from the New Mexico Oil Conservation Division (NMOCD) to accept non-exempt/non-hazardous soil from the E.O.T.T. CDU Tract 19-4" Site in Lea County New Mexico. The original NMOCD form C-138, EPI Waste Certificate of Waste Status, and laboratory characterization data are attached.

If there are any further questions or there is a need for information, please contact me at the office or at 505.390.7864.

Sincerely,

  
Pat McCasland  
EPI Technical Services Manager

cc: Frank Hernandez, E.O.T.T.  
Ben Miller, EPI Vice President and General Manager  
Sherry Miller, EPI President  
file

ENVIRONMENTAL PLUS, INC.



CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: Unit M Section 2 T21S R37E

Source: E.O.T.T. CDU TRACT 19-4"

Disposal Location: Environmental Plus, Inc.

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for E.O.T.T. ENERGY PIPELINE  
concur with the status of the waste from the subject site.

Name FRANK HERNANDEZ

Title/Agency D.E.S

Address P.O. Box 1660  
Midland, Texas 79703

Signature J. Norman

Date 3.12.01

**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

September 17, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-288-258-835**

Ms. Lennah Frost  
Environmental Engineer  
EOTT Energy  
P.O. Box 1660  
Midland, Texas 79702

**RE: CRUDE OIL GATHERING SYSTEM SPILLS**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Operating Limited Partnership (EOTT) August 8, 1996 correspondence which presents the results of representative RCRA hazardous waste characteristic sampling of contaminated soils from pipeline related spills of crude oil. EOTT requests that they be allowed to use these analyses and a statement of process knowledge for determining the soils to be RCRA non-hazardous during future crude oil pipeline spill remediations. These analyses are to be used in lieu of individual sampling of each spill event.

The above referenced request is approved with the following conditions:

1. The above representative analyses can be used in lieu of individual sampling of each spill event.
2. EOTT will reference the above waste determination identified as "EOTT-DENTON-8896" in all future RCRA non-exempt crude oil spill reports to the OCD.
3. EOTT will notify the OCD within 24 hours of any system changes which could potentially alter the composition of any spilled crude such that RCRA hazardous waste characteristics in the spill area could be exceeded.

Ms. Lennah Frost  
September 17, 1996  
Page -2-

Please be advised that OCD approval does not relieve EOTT of liability should these types of leaks and spills result in actual contamination of surface waters, ground waters or the environment. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and/or regulations. If you have questions please contact me at (505) 827-7152.

Sincerely,



Roger C. Anderson  
Environmental Bureau Chief

xc: OCD Artesia District Office  
Benito Garcia, NMED Hazardous and Radioactive Waste Bureau

Is your RETURN ADDRESS completed on the reverse side?	<b>SENDER:</b>		I also wish to receive the following services (for an extra fee):	
	<input type="checkbox"/> Complete items 1 and/or 2 for additional services. <input type="checkbox"/> Complete items 3, 4a, and 4b. <input type="checkbox"/> Print your name and address on the reverse of this form so that we can return this card to you. <input type="checkbox"/> Attach this form to the front of the mailpiece, or on the back if space does not permit. <input type="checkbox"/> Write "Return Receipt Requested" on the mailpiece below the article number. <input type="checkbox"/> The Return Receipt will show to whom the article was delivered and the date delivered.		1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
	3. Article Addressed to:		4a. Article Number	
	Ms. Lennah Frost EOTT Energy P.O. Box 1660 Midland Tx 79702		P 285 285 835	
	4b. Service Type		7. Date of Delivery	
<input type="checkbox"/> Registered <input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Return Receipt for Merchandise		<input checked="" type="checkbox"/> Certified <input type="checkbox"/> Insured <input type="checkbox"/> COD		
5. Received By: (Print Name)		8. Addressee's Address (Only if requested and fee is paid)		Thank you for using Return Receipt Service.
Sherry S. Sunday				
6. Signature: (Addressee or Agent)				
X				
PS Form 3811, December 1994				
Domestic Return Receipt				

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-138  
Revised March 17, 1999

Submit Original  
Plus 1 Copy  
to Appropriate  
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/>	4. Generator <i>E.O.T.T Energy Pipeline</i>
Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5. Originating Site <i>Shafter Lake GATHERING, G.O. Salmon Trucking</i>
2. Management Facility Destination <i>Environmental Plus Inc. Land Farm</i>	6. Transporter <i>WALLACE Concrete</i>
3. Address of Facility Operator <i>3 miles South of Eunice on SR 18. P.O. Box 1558, Eunice, NM 88231</i>	8. State <i>NM</i>
7. Location of Material (Street Address or ULSTR) <i>P.S. BHK A-46 Sec. 17 Andrews County, Texas</i>	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. <input checked="" type="radio"/> B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

*Crude oil Contaminated Soil.*

Estimated Volume 100 cy Known Volume (to be entered by the operator at the end of the haul) 336 cy

SIGNATURE *Pat McCasland*  
Waste Management Facility Authorized Agent

TITLE: *Technical Manager* DATE: *3-12-01*

TYPE OR PRINT NAME: *Pat McCasland*

TELEPHONE NO. *505-394-3481*

(This space for State Use)

APPROVED BY: \_\_\_\_\_

TITLE: \_\_\_\_\_

DATE: \_\_\_\_\_

APPROVED BY: *Monty J. Kelly*

TITLE: *Environmental Geologist*

DATE: *3-21-01*



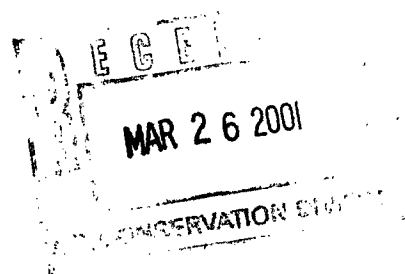
**ENVIRONMENTAL PLUS, INC.**  
STATE APPROVED LAND FARM AND ENVIRONMENTAL SERVICES

*Micro-Blaze*

*Micro-Blaze Oil™*

March 23, 2001

Ms. Martyne Kieling  
Oil Conservation Division  
P.O. Box 6429  
1220 S. Saint Francis Drive  
Santa Fe, New Mexico 87505



Subject: E.O.T.T. Shafter Lake Gathering #2000-10798 (G.Q. Salmon & Son Trucking) Non-exempt/non-hazardous soil Disposal documentation.

Dear Ms. Kieling,

During the week of March 12, 2001, Environmental Plus, Inc. (EPI) received verbal authorization from the New Mexico Oil Conservation Division (NMOCD) to accept non-exempt/non-hazardous soil from the E.O.T.T. Shafter Lake Gathering Site in Andrews County Texas, i.e., leak #2000-10798, G.Q. Salmon & Son Trucking yard. The original NMOCD form C-138, EPI Waste Certificate of Waste Status, and laboratory characterization data are attached.

If there are any further questions or there is a need for information, please contact me at the office or at 505.390.7864.

Sincerely,

Pat McCasland  
EPI Technical Services Manager

cc: Wayne Brunette, E.O.T.T.  
Ben Miller, EPI Vice President and General Manager  
Sherry Miller, EPI President  
file

ENVIRONMENTAL PLUS, INC.

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: P.S. BIK A-46 Section 17, Andrews County Texas  
Source: E.O.T.V. Energy Pipeline, Shafter Lake Gathering Crude Oil Pipeline  
Disposal Location: Environmental Plus, Inc. Landfarm

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for E.O.T.V. Energy Pipeline  
concur with the status of the waste from the subject site.

Name FRANK HERNANDEZ  
Title/Agency D. E. S.  
Address P.O. Box 1660  
Midland, Texas 79703  
Signature F. Hernandez  
Date 3-12-01

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT ENERGY  
ATTN: MR. WAYNE BRUNETTE  
P.O. BOX 1660  
MIDLAND, TEXAS 79703  
FAX: 915-684-3456  
FAX: 505-394-2601 (Pat McCasland)

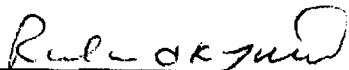
Sample Type: Soil  
Sample Condition: Intact/ Iced/ 1.0 deg. C  
Project #: 2000-10798  
Project Name: Shafter Lake Gathering  
Project Location: Salmon/ Andrews, TX

Sampling Date: See Below  
Receiving Date: 12/19/00  
Analysis Date: 12/19/00

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg	SAMPLE DATE
35423	SLG121900SBH	5.68	39.2	47.5	33.8	21.0	12/19/00
35424	→ SLG121800SPOILS	<0.500	1.58	3.42	3.32	2.12	12/18/00

% IA	96	93	90	88	91
% EA	94	92	92	92	94
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025

METHODS: SW 846- 8021B,5030

  
Raland K. Tuttle

12-20-00  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENRON TRANSPORTATION SERVICES  
ATTN: MR. WAYNE BRUNETTE  
P.O. BOX 1660  
MIDLAND, TEXAS 79703  
FAX: 915-684-3456  
FAX: 505-394-2601

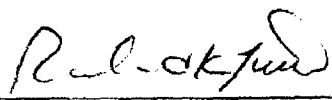
Sample Type: Soil  
Sample Condition: Intact / Iced / 1.0 deg C  
Project #: 2000-10798  
Project Name: Shafter Lake  
Project Location: Salmon/ Andrews, TX

Sampling Date: 12/18/00  
Receiving Date: 12/19/00  
Analysis Date: 12/21 & 12/28/00

ELT#	Field Code	TCLP METALS (mg/L)							
		Ag	As	Ba	Cd	Cr	Hg	Pb	Se
35424	→ SLG121800SPOILS	0.03	0.013	0.75	0.019	0.05	<0.002	0.21	<0.002

REPORT LIMIT	0.01	0.002	0.10	0.005	0.03	0.002	0.10	0.002
% IA	94	105	94	94	102	115	96	94
% EA	99	114	104	94	99	100	92	95

METHODS: EPA SW 846-1311, 3005, 7760, 7062, 7080, 7130, 7190, 7470, 7420, 7742

  
Raland K. Tuttle

1-03-01  
Date



# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENRON TRANSPORTATION SERVICES  
ATTN: MR. WAYNE BRUNETTE  
P.O. BOX 1660  
MIDLAND, TEXAS 79703  
FAX: 915-684-3456  
FAX: 505-394-2601

Sample Type: Soil  
Sample Condition: Intact/ Iced/ 1.0 deg. C  
Project #: 2000-10798  
Project Name: Shafter Lake Gathering  
Project Location: Salmons/ Andrews, TX

Sampling Date: 12/18/00  
Receivng Date: 12/19/00  
Analysis Date: See Below

ELT#	Field Code	REACTIVITY		CORROSIVITY (s.u.)	IGNITABILITY deg F
		H2S mg/kg	CN- mg/kg		
35424	→SLG121800SPOILS	<100	<50	7.10	>200

ANALYSIS DATE                      12/22/00 12/22/00 12/23/00                      12/28/00

METHODS: EPA SW-846 1010M,9045, 9012, 9034

  
Roland K. Tuttle

1-03-01  
Date

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

RECEIVED

MAR 08 2001

Environmental Bureau  
Oil Conservation Division

Form C-138  
Revised March 17, 1999

Submit Original  
Plus 1 Copy  
to Appropriate  
District Office

## REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		4. Generator <u>EOT Fleet</u>
2. Management Facility Destination <u>Environmental Plus, Inc.</u>		5. Originating Site <u>Pogo Patton 17 Fed. 1</u>
3. Address of Facility Operator <u>P.O. Box 1558 3 miles SE of Eunice on SR 18</u>		6. Transporter <u>Environmental Plus, Inc.</u>
7. Location of Material (Street Address or ULSTR) <u>Sec 17 T24S R31E</u>		8. State <u>NM</u>
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. <input checked="" type="radio"/> B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved <u>"EOT-Denton - 8896" Reference for Process Knowledge, in NMOC Letter Attached.</u> All transporters must certify the wastes delivered are only those consigned for transport.		

### BRIEF DESCRIPTION OF MATERIAL:

Crude oil contaminated soil.

Characterized as not hazardous by process knowledge.

Estimated Volume 6 cy Known Volume (to be entered by the operator at the end of the haul) 6 cy

SIGNATURE [Signature] TITLE: Technical Manager DATE: 3-3-01  
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Pat M Crasano TELEPHONE NO. 505-394-3481

(This space for State Use)

APPROVED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_ DATE: \_\_\_\_\_

APPROVED BY: [Signature] TITLE: Environmental Geologist DATE: 3-8-01

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: EOTT Pipeline Pogo Patton Sec 17 T24S R31E

Source: Truck Release

Disposal Location: ETSI LANDFARM

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

*Characterization by reference, i.e., "EOTT-Denton-8896"*

I, the undersigned as the agent for EOTT FLEET  
concur with the status of the waste from the subject site.

Name Scott E. Mack

Title / Agency ADM

Address P.O. Box 1460  
Midland, Texas 79702

Signature Scott E. Mack

Date 3-3-01



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

September 17, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-288-258-835**

Ms. Lennah Frost  
Environmental Engineer  
EOTT Energy  
P.O. Box 1660  
Midland, Texas 79702

**RE: CRUDE OIL GATHERING SYSTEM SPILLS**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Operating Limited Partnership (EOTT) August 8, 1996 correspondence which presents the results of representative RCRA hazardous waste characteristic sampling of contaminated soils from pipeline related spills of crude oil. EOTT requests that they be allowed to use these analyses and a statement of process knowledge for determining the soils to be RCRA non-hazardous during future crude oil pipeline spill remediations. These analyses are to be used in lieu of individual sampling of each spill event.

The above referenced request is approved with the following conditions:

1. The above representative analyses can be used in lieu of individual sampling of each spill event.
2. EOTT will reference the above waste determination identified as "EOTT-DENTON-8896" in all future RCRA non-exempt crude oil spill reports to the OCD.
3. EOTT will notify the OCD within 24 hours of any system changes which could potentially alter the composition of any spilled crude such that RCRA hazardous waste characteristics in the spill area could be exceeded.

Ms. Lennah Frost  
September 17, 1996  
Page -2-

Please be advised that OCD approval does not relieve EOTT of liability should these types of leaks and spills result in actual contamination of surface waters, ground waters or the environment. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and/or regulations. If you have questions please contact me at (505) 827-7152.

Sincerely,



Roger C. Anderson  
Environmental Bureau Chief

xc: OCD Artesia District Office  
Benito Garcia, NMED Hazardous and Radioactive Waste Bureau

<p><b>SENDER:</b></p> <ul style="list-style-type: none"> <li>Complete items 1 and/or 2 for additional services.</li> <li>Complete items 3, 4a, and 4b.</li> <li>Print your name and address on the reverse of this form so that we can return this card to you.</li> <li>Attach this form to the front of the mailpiece, or on the back if space does not permit.</li> <li>Write "Return Receipt Requested" on the mailpiece below the article number.</li> <li>The Return Receipt will show to whom the article was delivered and the date delivered.</li> </ul>		<p>I also wish to receive the following services (for an extra fee):</p> <p>1. <input type="checkbox"/> Addressee's Address</p> <p>2. <input type="checkbox"/> Restricted Delivery</p> <p>Consult postmaster for fee.</p>	
<p>3. Article Addressed to:</p> <p>Ms. Lennah Frost EOTT Emergency P.O. Box 1660 Midland Tx 79701</p>		<p>4a. Article Number</p> <p>P 285 255 835</p>	
<p>5. Received By: (Print Name)</p> <p>Shawn Sunday</p>		<p>4b. Service Type</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified</p> <p><input type="checkbox"/> Express Mail <input type="checkbox"/> Insured</p> <p><input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD</p>	
<p>6. Signature: (Addressee or Agent)</p> <p>X</p>		<p>7. Date of Delivery</p> <p>SEP 25 1996</p>	
		<p>8. Addressee's Address (Only if requested and fee is paid)</p>	

PS Form 3811, December 1994

Domestic Return Receipt

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

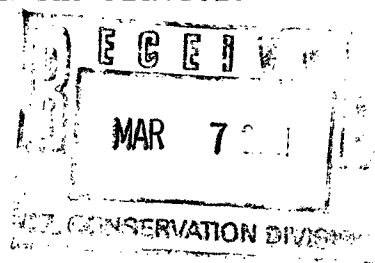


**ENVIRONMENTAL PLUS, INC.**

STATE APPROVED LAND FARM AND ENVIRONMENTAL SERVICES

*Micro-Blaze*

*Micro-Blaze Out™*



March 5, 2001

Martyne Kieling  
Energy Minerals and Natural Resources Dept.  
Oil Conservation Division  
P.O. Box 6429  
1220 S. Saint Francis Drive  
Santa Fe, New Mexico 87505

Subject: Form C-138 for non-exempt waste disposal

Dear Ms. Kieling,

As per our discussion of March 5, 2001, attached is the original form C-138 with supporting documentation, requesting disposal of "non-exempt" crude oil contaminated soil from an "E.O.T.T. Fleet" site on the Pogo Patton 17 Fed. 1 location in Section 17, T24S, R31E, in Eddy County, New Mexico.

Please call me at the office if more information is required.

Sincerely,

Pat McCasland  
EPI Technical Services Manager

cc: Ben Miller, EPI Vice President and General Manager  
Sherry Miller, EPI President

ENVIRONMENTAL PLUS, INC.

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-138  
Revised March 17, 1999

Submit Original  
Plus 1 Copy  
to Appropriate  
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Telephone 1-13-10 M. Keiling myk	4. Generator <u>Epsilon</u>
2. Management Facility Destination <u>Environmental Plus, Inc.</u>	5. Originating Site <u>Greenwood lease S/2, Section 9, T22S, R37E</u>
3. Address of Facility Operator <u>Office - 1324 N Main, Eunice NM</u> <u>Facility - 5 mi S of Eunice, NM</u>	6. Transporter <u>Environmental Plus, Inc.</u>
7. Location of Material (Street Address or ULSTR) <u>Unit, S9, T22S, R37E</u>	8. State <u>New Mexico</u>
9. <u>Circle One</u> : A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Soil contaminated with crude oil. Leak occurred downstream of the point of sale.

Estimated Volume 700 cy Known Volume (to be entered by the operator at the end of the haul) \_\_\_\_\_ cy

SIGNATURE Pat McCasland  
Waste Management Facility Authorized Agent

TITLE: General Manager DATE: 1-11-00

TYPE OR PRINT NAME: PAT MCCASLAND

TELEPHONE NO. 394-3481 / cell 390-7864

(This space for State Use)

APPROVED BY: Donna Williams

TITLE: Environ. Eng. Specialist DATE: 01-19-00

APPROVED BY: Monty J. Kelly

TITLE: Environmental Geologist DATE: 01-24-00

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: S/2, S9, T22S, R37E.

Source: Equilon Pipeline leak Greenwood Lease

Disposal Location: Environmental Plus, Inc.  
5 miles South of Eunice, NM

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.2 (b)."

I, the undersigned, the agent for Equilon  
concur with the status of the waste from the subject site.

Name Eddie Smith

Title/Agency NMCC Foreman

Address HCA1 Box 89  
Newer City, TX 79323

Signature Eddie Smith

Date 1-12-2000





# ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

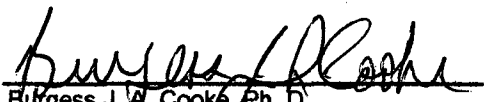
ANALYTICAL RESULTS FOR  
ENVIRONMENTAL PLUS, INC.  
ATTN: PAT McCASLAND  
P.O. BOX 1558  
EUNICE, NM 88231  
FAX TO: (505) 394-2601


Receiving Date: 01/05/00  
Reporting Date: 01/06/00  
Project Number: 1229  
Project Name: GREENWOOD  
Project Location: BETTIS

Sampling Date: 01/05/00  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: BC  
Analyzed By: BC

LAB NUMBER	SAMPLE ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/Kg)	DRO (>C <sub>10</sub> -C <sub>28</sub> ) (mg/Kg)	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE:		01/05/00	01/05/00	01/05/00	01/05/00	01/05/00	01/05/00
H4552-1	S0015EQCOMP.	4380	10400	0.249	5.70	6.96	11.0
Quality Control		1058	992	0.086	0.097	0.092	0.283
True Value QC		1000	1000	0.100	0.100	0.100	0.300
% Recovery		106	99.2	86.1	96.6	92.3	94.4
Relative Percent Difference		5.0	10.9	2.8	4.1	1.0	0.7

METHODS: TPH(GRO & DRO) - EPA SW-846 8015 M; BTEX/MTBE-EPA SW-846 8260

  
Burgess J. A. Cooke, Ph. D.

  
Date

H4552BT.XLS

PLEASE NOTE: **Liability and Damages.** Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



# ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR  
ENVIRONMENTAL PLUS, INC.  
ATTN: PAT McCASLAND  
P.O. BOX 1558  
EUNICE, NM 88231  
FAX TO: (505) 394-2601

Receiving Date: 01/05/00  
Reporting Date: 01/11/00  
Project Number: 1229  
Project Name: GREENWOOD  
Project Location: BETTIS

Sampling Date: 01/05/00  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: BC  
Analyzed By: AH

## TCLP METALS

LAB NO.	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
---------	-----------	-----------	-----------	-----------	-----------	-----------	-----------	-----------	-----------

ANALYSIS DATE:	01/07/00	01/06/00	01/06/00	01/06/00	01/06/00	01/06/00	01/10/00	01/07/00
EPA LIMITS:	5	5	100	1	5	5	0.2	1
H4552-1 S0015EQCOMP.	<1	<1	<5	<0.1	<1	<1	<0.02	<0.1
Quality Control	0.053	4.764	22.26	0.847	5.025	4.926	0.0096	0.193
True Value QC	0.050	5.000	25.00	1.000	5.000	5.000	0.0100	0.200
% Recovery	106	95	89	85	100	99	96	97
Relative Standard Deviation	0.2	0.3	1.3	0.1	1.2	0.5	5.9	1.4

METHODS: EPA 1311, 600/4-91/	206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2
------------------------------	-------	-------	-------	-------	-------	-------	-------	-------

*Amy Hill*  
Chemist

*01/11/00*  
Date

H4552M.XLS

PLEASE NOTE: **Liability and Damages.** Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



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PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR  
ENVIRONMENTAL PLUS, INC.  
ATTN: PAT McCASLAND  
P.O. BOX 1558  
EUNICE, NM 88231  
FAX TO: (505) 394-2601

Receiving Date: 01/05/00  
Reporting Date: 01/08/00  
Project Number: 1229  
Project Name: GREENWOOD  
Project Location: BETTIS  
Lab Number: H4552-1  
Sample ID: S0015EQCOMP.

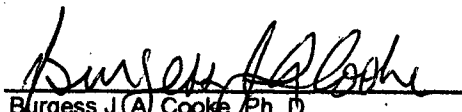
Analysis Date: 01/06/00  
Sampling Date: 01/05/00  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: BC  
Analyzed By: BC


TCLP VOLATILES (ppm)	EPA LIMIT	Sample Result H4552-1	Method Blank	QC	%Recov.	True Value QC
Vinyl Chloride	0.20	<0.005	<0.005	0.103	103	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.093	93	0.100
Methyl Ethyl Ketone	200	<0.050	<0.050	0.107	107	0.100
Chloroform	6.0	<0.005	<0.005	0.109	109	0.100
1,2-Dichloroethane	0.5	<0.005	<0.005	0.104	104	0.100
Benzene	0.5	<0.005	<0.005	0.092	92	0.100
Carbon Tetrachloride	0.5	<0.005	<0.005	0.097	97	0.100
Trichloroethylene	0.5	<0.005	<0.005	0.099	99	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.107	107	0.100
Chlorobenzene	100	<0.005	<0.005	0.102	102	0.100
1,4-Dichlorobenzene	7.5	<0.005	<0.005	0.099	99	0.100

% RECOVERY

Dibromofluoromethane	102
Toluene-d8	94
Bromofluorobenzene	94

METHODS: EPA SW 846-8260, 1311

  
Burgess J. Cooke, Ph. D.

  
Date

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PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR  
ENVIRONMENTAL PLUS, INC.  
ATTN: PAT McCASLAND  
P.O. BOX 1558  
EUNICE, NM 88231  
FAX TO: (505) 394-2601

Receiving Date: 01/05/00  
Reporting Date: 01/08/00  
Project Number: 1229  
Project Name: GREENWOOD  
Project Location: BETTIS  
Lab Number: H4552-1  
Sample ID: S0015EQCOMP.

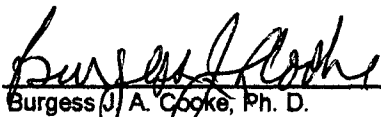
Analysis Date: 01/07/00  
Sampling Date: 01/05/00  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: BC  
Analyzed By: BC

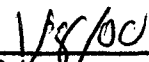
TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Sample Result H4552-1	Method Blank	QC	% Recov.	True Value QC
Pyridine	5.00	<0.005	<0.005	0.004	8	0.050
1,4-Dichlorobenzene	7.50	0.009	0.015	0.037	73	0.050
o-Cresol	200	<0.005	<0.005	0.021	41	0.050
m, p-Cresol	200	<0.005	<0.005	0.033	66	0.050
Hexachloroethane	3.00	<0.005	<0.005	0.033	66	0.050
Nitrobenzene	2.00	<0.005	<0.005	0.033	66	0.050
Hexachloro-1,3-butadiene	0.500	<0.005	<0.005	0.033	66	0.050
2,4,6-Trichlorophenol	2.00	<0.005	<0.005	0.033	66	0.050
2,4,5-Trichlorophenol	400	<0.005	<0.005	0.034	68	0.050
2,4-Dinitrotoluene	0.130	<0.005	<0.005	0.040	79	0.050
Hexachlorobenzene	0.130	<0.005	<0.005	0.040	80	0.050
Pentachlorophenol	100	<0.005	<0.005	0.040	79	0.050

% RECOVERY

Fluorophenol	21
Phenol-d5	20
Nitrobenzene-d5	80
2-Fluorobiphenyl	81
2,4,6-Tribromophenol	50
Terphenyl-d14	90

METHODS: EPA SW 846-8270, 1311, 3510

  
Burgess J. A. Cooke, Ph. D.

  
Date

PLEASE NOTE: **Liability and Damages.** Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



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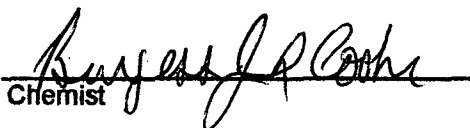
ANALYTICAL RESULTS FOR  
ENVIRONMENTAL PLUS, INC.  
ATTN: PAT McCASLAND  
P.O. BOX 1558  
EUNICE, NM 88231  
FAX TO: (505) 394-2601


Receiving Date: 01/05/00  
Reporting Date: 01/10/00  
Project Number: 1229  
Project Name: GREENWOOD  
Project Location: BETTIS

Sampling Date: 01/05/00  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: BC  
Analyzed By: AH/BC

LAB NUMBER SAMPLE ID	REACTIVITY			
	Sulfide (ppm)	Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY (°F)
ANALYSIS DATE:	01/06/00	01/06/00	01/10/00	01/05/00
H4552-1 S0015EQCOMP.	Not reactive	Not reactive	6.98	Nonflammable
Quality Control	NR	NR	7.02	NR
True Value QC	NR	NR	7.00	NR
% Recovery	NR	NR	100	NR
Relative Percent Difference	NR	NR	0	NR

METHOD: EPA SW 846-7.3, 7.2, 1030 (proposed), 1311, 40 CFR 261

  
Chemist

  
Date 1/10/00

2111 Beechwood, Abilene, TX 79603 101 East Marland, Hobbs, NM 88240  
(915) 673-7001 Fax (915) 673-7020 (505) 393-2326 Fax (505) 393-2476

Page 2 of 11[illegible]

† Cardinal cannot accept verbal changes. Please fax written changes to 915-673-7020.

District I - (505) 393-6161  
P. O. Box 1980  
Hobbs, NM 88241-1980  
District II - (505) 748-1283  
811  
Artesia  
District III - 78  
Rio Grande  
ec, NM 87410  
District IV - (505) 827-7131

New Mexico  
Energy, Minerals and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

Form C-138  
Originated 8/8/95

RECEIVED

DEC 11 1998

Submit Original  
Plus 1 Copy  
to appropriate  
District Office

General Bureau  
Oil Conservation Division

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> 11/25/98 "Chris Williams" 0814 MSTR "Chris Williams" NMOC	4. Generator TNM P. L.
Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5. Originating Site TNM-98-23 Boyd Prop. Site
2. Management Facility Destination EPI	6. Transporter BEH Const.
3. Address of Facility Operator 3 mi. South of Eunice St. Hwy 18	8. State New Mexico
7. Location of Material (Street Address or ULSTR) "C" Sect. 22, 23, 37E	Lea County
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.  All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Crude oil Affected Soil

Estimated Volume 650 cy Known Volume (to be entered by the operator at the end of the haul) cy

SIGNATURE: Roger Boone TITLE: Safety & Environmental DATE: 11-25-98  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: Roger Boone TELEPHONE NO. 505-594-2588

(This space for State Use)

DISTRICT 1 SUPERVISOR

APPROVED BY: Chris Williams TITLE: DATE: 11/30/98

APPROVED BY: Mortimer J. Kelly TITLE: Env Geologist DATE: 12/2/98





**CERTIFICATE OF WASTE STATUS**

**NON-EXEMPT WASTE MATERIAL**

Tnm-98-23

Originating Location: TNM SPILL Site Boyd Prop. "C" Sect. 22, T 23 S, R 37 E

Source: Crude oil Pipe Line SP

Disposal Location: EPI 3mi South of Eunice St. Hwy. 18

As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's July 1988 Regulatory Determination. To my knowledge, this waste will either be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or has been verified non-hazardous due to "Knowledge of Process." I further certify that to my knowledge no "hazardous or listed wastes" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 261.3 (b).

I, the undersigned as the agent for the Texas New Mexico Pipe Line Co.  
concur with the status of the waste from the subject site.

NAME John A. Savoie

TITLE/AGENCY Env. Rep.

ADDRESS P.O. Box 1030 Jal, N.M. 88252

SIGNATURE J. A. Savoie

DATE 11-25-98

District I - (505) 393-6161  
P.O. Box 1980  
Hobbs, NM 88241-1980  
District II - (505) 748-1283  
811 S. First  
Artesia, NM 88210  
District III - (505) 334-6178  
Rio Brazos Road  
ec, NM 87410  
District IV - (505) 827-7131

New Mexico  
Energy, Minerals and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

Form C-138  
Originated 8/8/97

Submit Original  
Plus 1 Copy  
to appropriate  
District Office

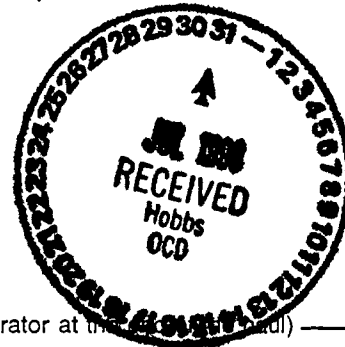
REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> <i>BY WAYNE PRICE 7/31/98</i>	4. Generator <i>TNM PLCO.</i>
Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5. Originating Site <i>TNM-96-S14</i>
2. Management Facility Destination <i>EPL</i>	6. Transporter <i>Merryman Const. Co.</i>
3. Address of Facility Operator <i>3m. S of Hwy 176 + Hwy 18 Eunice</i>	8. State <i>N.M.</i>
7. Location of Material (Street Address or ULSTR) <i>514, T 215, R 37E</i>	<i>Lea, NM</i>
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. <input checked="" type="radio"/> B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.  All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Crude oil Affected Soil

Non Hazardous By Knowledge of Process approval



Estimated Volume 1110 cy Known Volume (to be entered by the operator at the time of receipt) \_\_\_\_\_ cy

SIGNATURE: Ben Miller TITLE: K.P. DATE: July 31, 1998  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: Ben Miller TELEPHONE NO. 394-3481

(This space for State Use)

APPROVED BY: Edna Egan TITLE: Edna Egan DATE: 7/31/98  
APPROVED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_ DATE: \_\_\_\_\_

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: Site Tnm-96-S14 Sec. 14, T21S, R37E Lea N.M.

Source: Crude Oil Pipeline SPILL

Disposal Location: 3mi South of Hwy 176 & Hwy 18 Eunice N.M.

As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's July 1988 Regulatory Determination. To my knowledge, this waste will either be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or has been verified non-hazardous due to "Knowledge of Process." I further certify that to my knowledge no "hazardous or listed wastes" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 261.3 (b).

I, the undersigned as the agent for the Texas N.M. Pipeline Co.  
concur with the status of the waste from the subject site.

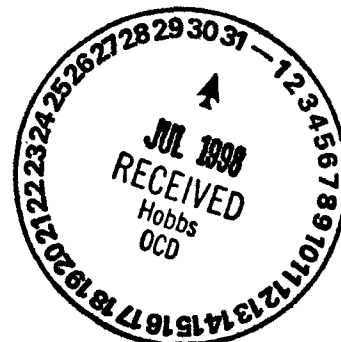
NAME John A. Savoie

TITLE/AGENCY Env. Rep.

ADDRESS P.O. Box 1030 Tul NM 88252

SIGNATURE J. A. Savoie

DATE 7-31-98



District I - (505) 393-6161  
P.O. Box 1980  
Hobbs, NM 88241-1980  
District II - (505) 748-1283  
811 S. First  
Artesia, NM 88210  
District III - (505) 334-6178  
1000 Rio Brazos Road  
Aztec, NM 87410  
District IV - (505) 827-7131

New Mexico  
Energy Minerals and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

Form C-138  
Originated 8/8/95

Submit Original  
Plus 1 Copy  
to appropriate  
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> Verbal Approval Received: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	4. Generator <u>Eott</u> 5. Originating Site <u>Sec-6-T-7-20-S-R-37-E</u> <u>Lea Co. NM</u>
2. Management Facility Destination <u>EPI</u>	6. Transporter <u>Merryman Const.</u>
3. Address of Facility Operator <u>P.O. Box 969 Eunice, NM 88231</u>	8. State <u>New Mexico</u>
7. Location of Material (Street Address or ULSTR) <u>3 miles southeast of Eunice, NM</u>	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. <input checked="" type="radio"/> B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.  All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Contaminated soil from Pipeline leak Eott has knowledge of process.

U.S. DEPARTMENT OF THE INTERIOR  
MAY 8 8 1997  
RECEIVED

Estimated Volume 36 cy Known Volume (to be entered by the operator at the end of the haul) 36 cy

SIGNATURE: Charlie Bettis TITLE: President DATE: 5-5-97  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: Charlie Bettis TELEPHONE NO. (505) 394-3481 or 394-2588

(This space for State Use)		
APPROVED BY: <u>[Signature]</u>	TITLE: <u>Envr Engr</u>	DATE: <u>5/8/97</u>
APPROVED BY: <u>[Signature]</u>	TITLE: <u>Environmental Geologist</u>	DATE: <u>6/4/97</u>

Printed in Hobbs 6/4/97

CERTIFICATE OF WASTE STATUSNON-EXEMPT WASTE MATERIAL

Originating Location: Sec 6, T-20-S, R-37-E, Lea Co  
Source: Crude oil pipeline Leak, Contaminated soil  
Disposal Location: EPI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for EOTT Energy  
concur with the status of the waste from the subject site.

Name Lennah Frost  
Title/Agency ENV. Engineer  
Address PO Box 1660  
MIDLAND TX 79702  
Signature Lennah Frost  
Date 5-5-97

36 yards

OLD MUDS  
OFFICE  
MAY 08 1997  
RECEIVED



**THE REPRODUCTION OF  
THE  
FOLLOWING  
DOCUMENT ( S )  
CANNOT BE IMPROVED  
DUE TO  
THE CONDITION OF  
THE ORIGINAL**



**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

September 17, 1996

**CERTIFIED MAIL****RETURN RECEIPT NO. P-288-258-835**

Ms. Lennah Frost  
Environmental Engineer  
EOTT Energy  
P.O. Box 1660  
Midland, Texas 79702

OLD RUBENS  
OFFICE

MAY 8 8 1997

RECEIVED

**RE: CRUDE OIL GATHERING SYSTEM SPILLS**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Operating Limited Partnership (EOTT) August 8, 1996 correspondence which presents the results of representative RCRA hazardous waste characteristic sampling of contaminated soils from pipeline related spills of crude oil. EOTT requests that they be allowed to use these analyses and a statement of process knowledge for determining the soils to be RCRA non-hazardous during future crude oil pipeline spill remediations. These analyses are to be used in lieu of individual sampling of each spill event.

The above referenced request is approved with the following conditions:

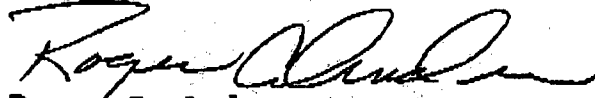
1. The above representative analyses can be used in lieu of individual sampling of each spill event.
2. EOTT will reference the above waste determination identified as "EOTT-DENTON-8896" in all future RCRA non-exempt crude oil spill reports to the OCD.
3. EOTT will notify the OCD within 24 hours of any system changes which could potentially alter the composition of any spilled crude such that RCRA hazardous waste characteristics in the spill area could be exceeded.



Ms. Lennah Frost  
September 17, 1996  
Page -2-

Please be advised that OCD approval does not relieve EOTT of liability should these types of leaks and spills result in actual contamination of surface waters, ground waters or the environment. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and/or regulations. If you have questions please contact me at (505) 827-7152.

Sincerely,



Roger C. Anderson  
Environmental Bureau Chief

xc: OCD Artesia District Office  
Benito Garcia, NMED Hazardous and Radioactive Waste Bureau

OLD HUBS  
OFFICE  
MAY 08 1997  
RECEIVED



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

**From:** Wayne Price  
**Sent:** Thursday, May 08, 1997 2:13 PM  
**To:** Martyne Kieling  
**Cc:** Jerry Sexton  
**Subject:** C-138 EPI/ EOTT sec 6-Ts20s-R37e 2 bbl leak  
**Importance:** High

Dear Martyne,

I am sending up the above referenced C-138 for your approval.

Please note this material has already been delivered to the EPI Landfarm.

After checking with both EPI & EOTT it appears there was a mis-communication between the two parties and the fact that key personnel for both companies were not present during the emergency response and clean-up event.

I have discussed this issue with both Charlie Bettis (EPI) and Lenna Frost (EOTT) and both have agreed to notify the NMOCD in the future.

I feel this type of miscommunication has been resolved and recommend approval.

cc: Charlie Bettis EPI  
Lenna Frost EOTT

District I - (505) 393-6161  
P.O. Box 1980  
Hobbs, NM 88241-1980  
District II - (505) 748-1283  
811 S. First  
Artesia, NM 88210  
District III - (505) 334-6178  
1000 Rio Brazos Road  
Aztec, NM 87410  
District IV - (505) 827-7131

New Mexico  
Energy Minerals and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

Form C-138  
Originated 8/8/95

Submit Original  
Plus 1 Copy  
to appropriate  
District Office

cc: MARTINE  
KEILING  
G WINK  
C WILLIAMS

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> <i>PER G WINK-OK</i>	4. Generator EOTT
Verbal Approval Received: Yes <input checked="" type="checkbox"/> Wayne Price No <input type="checkbox"/>	5. Originating Site Sec-6-T-21-S-R-37-E
2. Management Facility Destination EPT	6. Transporter B & H Construction
3. Address of Facility Operator P.O. Box 969 Eunice, NM 882311	8. State New Mexico
7. Location of Material (Street Address or ULSTR) Sec-6-T-21-S-R-37-E	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. <i>(B)</i> All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.  All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Crude Oil P/L Leak  
Certificate of waste status attached  
Eott has knowledge of Process

ALL FILES  
JUN 02 1997  
RECEIVED

PER EOTT'S LENA FROST, SMALL LEAK NON-REPORTABLE  
VERBAL APPROVAL BY UNMCD I, EMERGENCY RESPONSE

Estimated Volume 48 cy Known Volume (to be entered by the operator at the end of the haul) 48 cy

SIGNATURE: Charlie Bettis TITLE: President DATE: 05-20-97  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: Charlie Bettis TELEPHONE NO. (505) 394-3481

(This space for State Use)  
APPROVED BY: Wayne Price TITLE: ENVIRON FRGM DATE:   
APPROVED BY: Martine J. Keiling TITLE: Environmental Geologist DATE: 6/6/97

Printed in Hobbs 6/6/97

CERTIFICATE OF WASTE STATUSNON-EXEMPT WASTE MATERIAL

Originating Location:

Sec 6, T-20-S, R-37-E

Source:

Crude Oil P/L leak

Disposal Location:

EPI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waster will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b) ."

I, the undersigned as the agent for

EDT Energy Pipeline  
concur with the status of the waste from the subject site.

Name

Lennah Frost

Title/Agency

ENV. ENG

Address

PO Box 1660Midland TX 79702

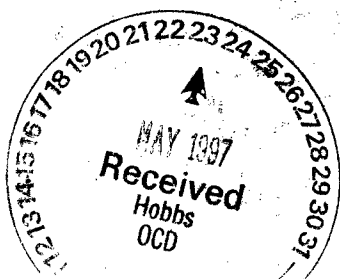
Signature

Lennah Frost

Date

5-20-97

OLD HUSBS  
OFFICE  
JUN 6 2 1997  
RECEIVED



1997  
MAY

District I - (505) 393-6161  
P.O. Box 1980  
Hobbs, NM 88241-1980  
District II - (505) 748-1283  
811 S. First  
Artesia, NM 88210  
District III - (505) 334-6178  
1000 Rio Brazos Road  
Aztec, NM 87410  
District IV - (505) 827-7131

New Mexico  
Energy Minerals and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

TO: MARTHA KIELING  
CC: C PERRIN/GWINN  
KAREN SHARP

Form C-1  
Originated 8/

Submit Original  
Plus 1-  
to appropriate  
District C

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> <u>PER C. PERRIN-NAVED</u>	4. Generator <u>Eott</u>
Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5. Originating Site <u>Approx. 4-miles south of Jal, NM</u>
2. Management Facility Destination <u>EPI</u>	6. Transporter <u>Merryman Const.</u>
3. Address of Facility Operator <u>P.O. Box 969 Eunice, NM 88231</u>	8. State <u>New Mexico</u>
7. Location of Material (Street Address or ULSTR) <u>3 miles southeast of Eunice, NM</u>	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.  All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Contaminated soil from pipeline leak Eott has knowledge of process

OLD HOBBS  
OFFICE  
MAY 8 8 1997  
RECEIVED

Estimated Volume 1668 cy Known Volume (to be entered by the operator at the end of the haul) 1668 cy

SIGNATURE: Charlie Bettis TITLE: President DATE: 4-30-97  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: Charlie Bettis TELEPHONE NO. (505) 394-3481 or 394-2588

(This space for State Use)  
APPROVED BY: [Signature] TITLE: Frank Egan DATE: 5/8/97  
APPROVED BY: Martina Kieling TITLE: Environmental Geologist DATE: 5/12/97

Printed in Hobbs 5/12/97

CERTIFICATE OF WASTE STATUSNON-EXEMPT WASTE MATERIAL

Originating Location: Sec 7, T-26-S, R-37-E, Bennett Jct, Lea  
Source: Crude oil pipeline Leak - contaminated soil Co, NM  
Disposal Location: EPI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for EOTT ENERGY  
concur with the status of the waste from the subject site.

Name Lennah Frost  
Title/Agency ENV. Engineer  
Address PO Box 1660  
MIDLAND TX 79702  
Signature Lennah Frost  
Date 5-1-97

1668 yards

U.S. ENVIRONMENTAL  
PROTECTION AGENCY  
MAY 8 1997  
RECEIVED

**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT****OIL CONSERVATION DIVISION  
2040 South Pecos Street  
Santa Fe, New Mexico 87505  
(505) 827-7131**

September 17, 1996

**CERTIFIED MAIL  
RETURN RECEIPT NO. P-288-258-835**

Ms. Lennah Frost  
Environmental Engineer  
EOTT Energy  
P.O. Box 1660  
Midland, Texas 79702

**RE: CRUDE OIL GATHERING SYSTEM SPILLS**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Operating Limited Partnership (EOTT) August 8, 1996 correspondence which presents the results of representative RCRA hazardous waste characteristic sampling of contaminated soils from pipeline related spills of crude oil. EOTT requests that they be allowed to use these analyses and a statement of process knowledge for determining the soils to be RCRA non-hazardous during future crude oil pipeline spill remediations. These analyses are to be used in lieu of individual sampling of each spill event.

The above referenced request is approved with the following conditions:

1. The above representative analyses can be used in lieu of individual sampling of each spill event.
2. EOTT will reference the above waste determination identified as "EOTT-DENTON-8896" in all future RCRA non-exempt crude oil spill reports to the OCD.
3. EOTT will notify the OCD within 24 hours of any system changes which could potentially alter the composition of any spilled crude such that RCRA hazardous waste characteristics in the spill area could be exceeded.

**OLD RUBB  
OFFICE  
MAY 08 1997  
RECEIVED**



Ms. Lennah Frost  
September 17, 1996  
Page -2-

Please be advised that OCD approval does not relieve EOTT of liability should these types of leaks and spills result in actual contamination of surface waters, ground waters or the environment. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and/or regulations. If you have questions please contact me at (505) 827-7152.

Sincerely,



Roger C. Anderson  
Environmental Bureau Chief

xc: OCD Artesia District Office  
Benito Garcia, NMED Hazardous and Radioactive Waste Bureau

OCD HUBB  
OFFICE  
MAY 08 1997  
RECEIVED

## DISTRICT I

P.O. Box 1980, Hobbs, NM 88241-1980

## DISTRICT II

P.O. Drawer DD, Artesia, NM 88211-0719

## DISTRICT III

1000 Rio Brazos Rd, Aztec, NM 87410

## State of New Mexico

Energy, Minerals and Natural Resources Department

## OIL CONSERVATION DIVISION

P.O. Box 2088

Santa Fe, New Mexico 87504-2088

SUBMIT 2 COPIES TO  
APPROPRIATE DISTRICT  
OFFICE IN ACCORDANCE  
WITH RULE 116 PRINTED  
ON BACK SIDE OF FORM

## NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

OPERATOR <b>EOTT ENERGY Pipeline</b>					ADDRESS <b>PO Box 1660 Midland Tx 79702</b>		TELEPHONE # <b>915/681-2240</b>	
REPORT OF	FIRE	BREAK	SPILL	LEAK <b>X</b>	BLOWOUT	OTHER*		
TYPE OF FACILITY	DRLG WELL	PROD WELL	TANK BTRY	PIPE LINE <b>X</b>	GASO PLNT	OIL RFY	OTHER*	
FACILITY NAME: <b>Bennet Jct 8"</b>								
LOCATION OF FACILITY Qtr/Qtr Sec. or Footage					SEC. <b>7</b>	TWP. <b>26-S</b>	RGE. <b>37-E</b>	COUNTY <b>Lea</b>
DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK <b>4 miles S. of Jal @ Bennett, NM</b>								
DATE AND HOUR OF OCCURRENCE <b>4:30am 4/23/97</b>					DATE AND HOUR OF DISCOVERY <b>4/23/97 9:00am</b>			
WAS IMMEDIATE NOTICE GIVEN?		YES <b>X</b>	NO	NOT REQUIRED	IF YES, TO WHOM <b>Karen, ocd, NRC, State Police</b>			
BY WHOM <b>Lennah Frost</b>					DATE AND HOUR <b>10:40am</b>			
TYPE OF FLUID LOST <b>CRUDE OIL</b>					QUANTITY OF LOSS <b>250 bbl</b>		VOLUME RECOVERED <b>125 bbl</b>	
DID ANY FLUIDS REACH A WATERCOURSE?		YES	NO <b>X</b>	QUANTITY				
IF YES, DESCRIBE FULLY**								
DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN**								
<p><b>Line shut down &amp; drained. Line was idle leg of mainline. Pipe was blind flanged &amp; put back in service.</b></p>								
DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN**								
<p><b>Pipe line split 6" due to internal corrosion. Contaminated soil was excavated &amp; disposed of @ EPI landfarm. Area backfilled w/ clean sand.</b></p>								
DESCRIPTION OF AREA	FARMING	GRAZING	URBAN	OTHER* <b>horse Corral</b>				
SURFACE CONDITIONS	SANDY <b>X</b>	SANDY LOAM	CLAY	ROCKY	WET	DRY	SNOW	
DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**								
<b>Clear &amp; warm</b>								
I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF								
SIGNED <b>Lennah Frost</b>		PRINTED NAME <b>Lennah Frost</b> AND TITLE <b>ENVIRO. Engineer</b>				DATE <b>4-25-97</b>		

\*SPECIFY

\*\*ATTACH ADDITIONAL SHEETS IF NECESSARY

District I - (505) 393-6161  
P.O. Box 1940  
Hobbs, NM 88241-1980  
District II - (505) 748-1283  
811 S. First  
Artesia, NM 88210  
District III - (505) 334-6178  
1000 Rio Brazos Road  
Aztec, NM 87410  
District IV - (505) 827-7131

New Mexico  
Energy Minerals and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

Form C-138  
Originated 4/18/95

Submit Original  
Plus 1 Copy  
to appropriate  
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

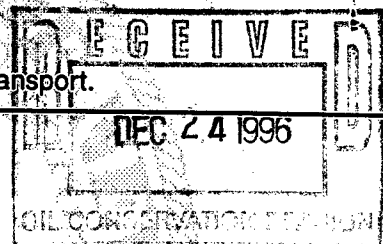
1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> BY WAYNE PRICE	4. Generator EOTT
Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5. Originating Site SW 1/4 Sec 24 T 20S R 36E
2. Management Facility Destination EPI	6. Transporter B&H Maint. & Const.
3. Address of Facility Operator POB 969 Eunice, N.M. 88231	8. State New Mexico
7. Location of Material (Street Address or ULSTR) SW 1/4 Sec 24 T 20S R 36 E	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.  All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Contaminated soil from Pipeline Leak

GAVE VERBAL PERMISSION AND A EMERGENCY  
PERMIT

EOTT HAS KNOWLEDGE OF PROCESS



OLD HOBBS  
DEC 21 1996  
RECEIVED

Estimated Volume 121 cy Known Volume (to be entered by the operator at the end of the haul) 121 cy

SIGNATURE: Charlie Bettis TITLE: President DATE: 12/20/96  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: Charlie Bettis TELEPHONE NO. 505-394-3481

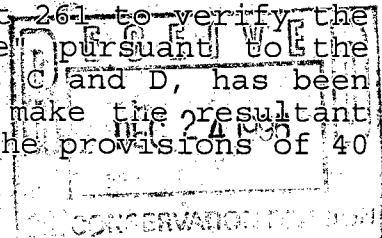
(This space for State Use)		
APPROVED BY: <u>[Signature]</u>	TITLE: <u>Frank Bryan</u>	DATE: <u>12/30/96</u>
APPROVED BY: <u>[Signature]</u>	TITLE: <u>Bureau Chief</u>	DATE: <u>1/3/97</u>

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: EUNICE NM  
MONUMENT, N. MEX. SE 1/4 SW 1/4 SEC 26  
Source: Pipeline LEAK  
Disposal Location: EPI  
T-21-S-R-376

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."



I, the undersigned as the agent for EOTT ENERGY CORP.  
concur with the status of the waste from the subject site.

Name BOBBY GARDUÑO  
Title/Agency ASST. PIPELINE MANAGER  
Address P.O. Box 5050  
HOBBS, N.M. 88240  
Signature Bobby Garduño  
Date Dec 19, 1996

JOE HUBBS  
OFFICE

DEC 20 1996

RECEIVED

Box I - (505) 393-6161  
Box 1940  
P.O. Box 1940  
District II - (505) 748-1283  
811 S. First  
Artesia, NM 88210  
District III - (505) 334-6178  
1000 Rio Brazos Road  
Aztec, NM 87410  
District IV - (505) 827-7131

New Mexico  
Energy Minerals and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

Form C-138  
Originated 4/18/95

Submit Original  
Plus 1 Copy  
to appropriate  
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> BY 2440B PPR 12	4. Generator EOTT
Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5. Originating Site SE 11/4 SW 1/4 SEC 26 T21S R37E
2. Management Facility Destination EPI	6. Transporter B&H Maint. & Const.
3. Address of Facility Operator POB BOX 969 Eunice, N.M. 88231	8. State New Mexico
7. Location of Material (Street Address or ULSTR) SE 1/4 SW 1/4 Sec 26 T 21-S R 37E	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.  All transporters must certify the wastes delivered are only those consigned for transport.	

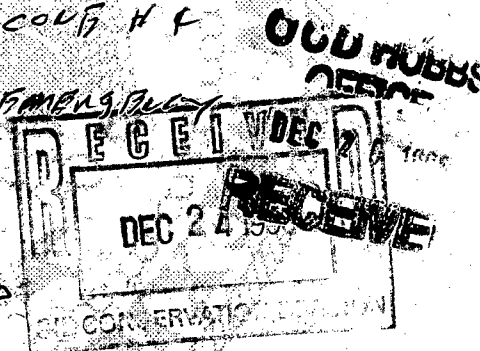
BRIEF DESCRIPTION OF MATERIAL:

Contaminated soil from Pipeline Leak

EUNICE NM 7540 N of JN COVE H F

GAVE VERBAL PERMISSION UNDER EMERGENCY  
RESPONSE!

EOTT HAS KNOWLEDGE OF PROCESS



Estimated Volume 200 + cy Known Volume (to be entered by the operator at the end of the haul) \_\_\_\_\_ cy

SIGNATURE: Charlie Bettis TITLE: President DATE: 12-20-96  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: Charlie Bettis TELEPHONE NO. 505-394-3481

(This space for State Use)

APPROVED BY: [Signature] TITLE: Environ Eng'r DATE: 12/20/96  
APPROVED BY: [Signature] TITLE: Bureau Chief DATE: 1/3/97

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: MONUMENT ~~EAST OF FENCE~~ SW 1/4 Sec 24 T20S R36E  
Source: PIPELINE LEAK  
Disposal Location: EPI

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

DEC 24 1996

I, the undersigned as the agent for EOTI ENERGY CORP. concur with the status of the waste from the subject site.

Name Bobby Garduño  
Title/Agency Asst. Pipeline Manager  
Address P.O. Box 5050  
Hobbs, New Mexico 88240  
Signature Bobby Garduño  
Date Dec 19, 1996

OLD HUBBS  
OFFICE

DEC 20 1996

RECEIVED

District I - (505) 393-6161  
P.O. Box 1940  
Hobbs, NM 88241-1980  
District II - (505) 748-1283  
811 S. First  
Artesia, NM 88210  
District III - (505) 334-6178  
1000 Rio Brazos Road  
Aztec, NM 87410  
District IV - (505) 827-7131

New Mexico  
Energy Minerals and Natural Resources Department  
Oil Conservation Division

Form C-138  
Originated 4/18/95

Submit Original  
Plus 1 Copy  
to appropriate  
District Office

2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/>	4. Generator EOTT Energy
Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5. Originating Site Poker Lake G.S. Poker Lake Station
2. Management Facility Destination Environmental Plus, Inc.	6. Transporter Wallach Concrete
3. Address of Facility Operator P.O. Box 969 Eunice, NM 88231	8. State New Mexico
7. Location of Material (Street Address or ULSTR)	E.P.I. 3 miles S of Eunice
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.  All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Material from truck sump run over

EOTT has knowledge of process

RECEIVED

FEB 15 1996

OLD HOBBS  
OFFICE

Estimated Volume 14 cy Known Volume (to be entered by the operator at the end of the haul) 14 cy

SIGNATURE: Charlie Bettis TITLE: President DATE: 2-14-96  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: Charlie Bettis TELEPHONE NO. (505) 394-3481

(This space for State Use)

APPROVED BY: [Signature] TITLE: ENM ENM DATE: 2-15-96  
APPROVED BY: [Signature] TITLE: GEOLOGIST DATE: 2/21/96

CERTIFICATE OF WASTE STATUSNON-EXEMPT WASTE MATERIAL

Originating Location: Poker Lake Station & Poker Lake G.S.  
Source: TRUCK Sump Runover  
Disposal Location: ENVIRONMENTAL Plus, Inc

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for EOTT Energy Operating Limited Partnership concur with the status of the waste from the subject site.

Name Lennah Frost  
Title/Agency ENV & Safety Coord  
Address PO Box 1660  
MIDLAND TX 79702  
Signature Lennah Frost  
Date 2-8-96

**RECEIVED**

FEB 13 1996

OCC HUBBS  
OFFICE



District I - (505) 393-6161  
P.O. Box 1940  
Hobbs, NM 88241-1980  
District II - (505) 748-1283  
811 S. First  
Artesia, NM 88210  
District III - (505) 334-6178  
1000 Rio Brazos Road  
Aztec, NM 87410  
District IV - (505) 827-7131

New Mexico  
Energy Minerals and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

Form C-138  
Originated 4/18/95

Submit Original  
Plus 1 Copy  
to appropriate  
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input checked="" type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> <i>N</i>	4. Generator EOTT Energy
Verbal Approval Received: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	5. Originating Site Dawson Injection Station Dawson Co., TX
2. Management Facility Destination Environmental Plus Inc.	6. Transporter EOTT Energy
3. Address of Facility Operator P.O. Box 969 Eunice, NM 88231	8. State Texas
7. Location of Material (Street Address or ULSTR) Dawson Injection Station Dawson, Texas	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.  All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Contaminated soil from EOTT'S Dawson Injection Station located in Dawson County, Texas.

RECEIVED

JAN 29 1996

JOJO HUBBS  
OFFICE

RECEIVED

JAN 15 1996

OFFICE

RECEIVED TELP - will send within the 1/15/96  
RECEIVED TELP - OK 1/26/96

Estimated Volume 25 yds cy Known Volume (to be entered by the operator at the end of the haul) cy

SIGNATURE: Charlie Bettis TITLE: PRESIDENT DATE: 1-15-96  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: Charlie Bettis TELEPHONE NO. 394-3481

(This space for State Use)

APPROVED BY: [Signature] TITLE: ENR ENR DATE: 1/26/96

APPROVED BY: [Signature] TITLE: GEOLOGIST DATE: 2/1/96

# EOTT ENERGY Operating Limited Partnership

P.O. BOX 1660  
5805 E. BUSINESS 20  
MIDLAND, TEXAS 79702  
(915) 682-8251

January 8, 1996

Environmental Plus, Inc.  
Box 969  
Eunice, NM 88231  
Attn: Charlie Bettis

RE: Disposal of Crude Oil Contaminated Soil  
Dawson Injection Station, Texas

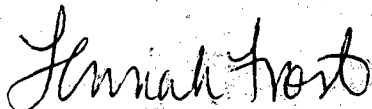
Dear Charlie:

Per our conversation today, EOTT would like to dispose of approximately 25 yards of contaminated soil from our Dawson Injection Station located in Dawson County, Texas. The Texas Railroad Commission has issued Minor Permit #8A-2102 permitting us to dispose of the waste at your landfarm in New Mexico.

Attached is the lab report on THP levels in the soil from the site. The OCD has indicated that there shouldn't be a problem with us transporting the soil from Texas into New Mexico, pending TRRC Approval, lab reports and your request for disposal.

The TRRC Minor Permit is good for 30 days from today so we would like to complete this project as soon as possible. Thanks for your help in this matter.

Sincerely,



Lennah Frost  
Environmental & Safety Coordinator

/ld  
attachment

cc: Al Hugh  
John Walke

RECEIVED  
JAN 15 1996  
EOTT ENERGY  
OFFICE

EOTT ENERGY CORP.

General Partner

FORM NO. 105-817 (3/84)

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt"

EOTT ENERGY  
ATTN: MRS. LENNAH FROST  
P.O. BOX 1660  
MIDLAND, TEXAS 79703  
FAX: 915-682-4765

RECEIVING DATE: 12/19/95  
SAMPLE TYPE: SOIL  
PROJECT #: DAWSON STATION

ANALYSIS DATE: 12/19/95  
SAMPLING DATE: NONE GIVEN  
SAMPLE CONDITION: INTACT

ELT#	FIELD CODE	TPH (mg/kg)
6440	DAWSON STATION	63,500
	QUALITY CONTROL	936
	TRUE VALUE	936
	% PRECISION	100

Methods: EPA 418.1

  
Michael R. Fowler

12-28-95  
Date

RECEIVED  
JAN 10 1996  
LABORATORY  
OFFICE

## FAX COVER SHEET

**EOTT ENERGY CORP.**  
GENERAL PARTNERSHIP FOR  
**EOTT ENERGY OPERATING LIMITED PARTNERSHIP**  
AND  
**EOTT ENERGY PIPELINE LIMITED PARTNERSHIP**  
5805 E. Highway 80  
P.O. Box 1660  
Midland, Texas 79702  
Main Telephone Number: 915-687-0783  
Fax Number: 915-682-2781

TOTAL NUMBER OF PAGES: 8  
(INCLUDING THIS COVER PAGE)

DATE: 1-25-96

TO: NAME:

Wayne Price

COMPANY/DEPT.:

OCD

FAX NUMBER:

TEL. NUMBER/EXT.:

FROM: NAME:

Jennah Frost

DEPT./CITY:

TEL. NUMBER/EXT.:

915/687-2040 X-34

COMMENTS:

Wayne - Please Call  
me as soon as you  
receive this.

**IMPORTANT/CONFIDENTIAL:** The information contained in this facsimile message is legally privileged and/or confidential information initially intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or a representative of that intended recipient, you are hereby notified that any dissemination, distribution or copying of this telecopy is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and return the original message to us at the address above via the U.S. Postal Service. Thank You.

In case of a problem with this fax, please call our main telephone number: 915-687-0783.  
Thank You.

**RECEIVED**

JAN 28 1996

UCC HUBBS  
OFFICE

CERTIFICATE OF WASTE STATUSNON-EXEMPT WASTE MATERIAL

Originating Location: Dawson Injection Station, Dawson  
Source: Crude oil Contaminated Soil Co, TX  
Disposal Location: EPI, Eunice NM

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or "listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for EOTT Energy Operating  
concur with the status of the waste from the subject site  
General Partnership

Name Lennah FROST  
Title/Agency ENV & Safety Coord.  
Address PO Box 1660  
MIDLAND, TX 79703  
Signature Lennah Frost  
Date 1-25-96

**RECEIVED**

JAN 26 1996

JOE HUBBS  
OFFICE

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT ENERGY  
ATTN: LENNAH FROST  
P.O. BOX 1880  
MIDLAND, TEXAS 79703  
FAX: 915-692-4765

Receiving Date: 01/17/96  
Sample Type: SOIL  
Project: DAWSON STA  
Project Location: DAWSON STA

Reporting Date: 01/23/96  
Sampling Date: 01/17/96  
Sample Condition: Intact  
Analysis Date: 01/19/96

## TCLP METALS (ppm)

ELT#	Field Code	Ag	As	Ba	Cd	Cr	Hg	Pb	Se
	EPA LIMIT	5.00	5.00	100.0	1.00	5.00	0.20	5.00	1.00
6608	SOIL	0.01	<0.002	0.64	0.01	<0.05	<0.001	0.10	<0.002
Minimum Detection Level		0.01	0.002	0.1	0.01	0.02	0.001	0.1	0.002
% IA		101	99	101	100	99	100	98	99
% EA		97	93	102	101	115	99	111	95

METHODS: EPA SW 846-1311, 7081, 7080, 7780, 7130, 7150, 7420, 7471, 7741

  
Michael R. Fowler

1-25-96  
Date

**RECEIVED**

JAN 26 1996

OLD HUBBS  
OFFICE

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1713

JAN-25-1996 11:32

P.05

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt"

EOTT ENERGY  
ATTN: LENNAH FROST  
P.O. BOX 1880  
MIDLAND, TEXAS 79703  
FAX: 915-687-2713

RECEIVING DATE: 01/17/96  
SAMPLE TYPE: SOIL  
PROJECT : DAWSON STA.  
FIELD CODE: DAWSON STA.

ANALYSIS DATE: 01/23/96  
SAMPLING DATE: 01/17/96  
SAMPLE CONDITION: Intact

TOLP VOLATILES (ppm)	SAMPLE 8688	PQL	BLANK	%EA	%IA
1,1-Dichloroethene	ND	0.125	ND	100	115
2-Butanone	ND	25	ND		84
Chloroform	ND	0.125	ND		104
Benzene	ND	0.125	ND	105	108
1,2-Dichloroethene	ND	0.125	ND		88
Vinyl Chloride	ND	0.125	ND		87
Carbon Tetrachloride	ND	0.125	ND		91
Trichloroethene	ND	0.125	ND	104	89
Tetrachloroethene	ND	0.125	ND		85
Chlorobenzene	ND	0.125	ND	101	82
1,4-Dichlorobenzene	ND	0.125	ND		107

SYSTEM MONITORING COMPOUNDS  
dibromofluoromethane  
toluene-d8  
4-bromofluorobenzene

% RECOVERY  
80  
103  
85

ND = < PQL  
PQL = PRACTICAL QUANTITATION LIMIT  
Method: EPA SW 846-8240.1811

  
Michael R. Fowler

1-25-96  
Date

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P.01

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OFFICE

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT ENERGY  
ATTN: LENNAH FROST  
P.O. BOX 1680  
MIDLAND, TEXAS 79703  
FAX: 915-687-2713

Receiving Date: 11/17/96  
Sample Type: SOIL  
Project #: DAWSON STA.

Analysis Date: 01/24/96  
Sampling Date: 01/17/96  
Sample Condition: Intact

Field Code: DAWSON STA

TCLP SEMIVOLATILE ORGANICS (ppm)	PQL	ELT# 0588	BLANK	%EA	%IA
Pyridine	0.020	ND	ND		103
1,4-Dichlorobenzene	0.020	ND	ND	54	97
o-Cresol	0.020	ND	ND		100
Nitrobenzene	0.020	ND	ND		108
m,p -Cresol	0.020	ND	ND		100
Hexachloroethane	0.020	ND	ND		118
Hexachlorobutadiene	0.020	ND	ND	28	77
2,4,6-Trichlorophenol	0.020	ND	ND	72	84
2,4,5-Trichlorophenol	0.020	ND	ND		122
2,4-Dinitrotoluene	0.020	ND	ND		83
Hexachlorobenzene	0.020	ND	ND		107
Pentachlorophenol	0.100	ND	ND	123	111

ND= NOT DETECTED, < PQL  
SYSTEM MONITORING COMPOUNDS

	% Recovery
2-Fluorophenol	88
Phenol-d5	48
Nitrobenzene-d5	101
2-Fluorobiphenyl	110
2,4,6-Trichlorophenol	118
Terphenyl-d14	88

Method: BW 846-8270.1311..

  
Michael R. Foster

1-25-96  
Date

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JAN 26 1996

JOE HUBBS  
OFFICE

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1226 • Fax: (915) 563-1713

JAN-25-1996 11:30

P.02





## "Don't Treat Your Soil Like Dirt!"

**EOTT ENERGY  
ATTN: LENNAH FROST  
P.O. BOX 1000  
MIDLAND, TEXAS 79708  
FAX: 815-832-4785**

Receiving Date: 01/17/96  
Sample Type: SOIL  
Project: DAWSON STA.  
Project Location: DAWSON STA.

Analysis Date: 01/17/98  
Sampling Date: 01/17/98  
Sample Condition: Intact

ELTU	FIELD CODE	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYLBENZENE (mg/Kg)	m,p-XYLENE (mg/Kg)	o-XYLENE (mg/Kg)
6588	SOIL	<0.100	<0.100	<0.100	0.335	0.618
	% IA	102	102	107	110	114
	% EA	98	98	92	93	93
	BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

**METHODS:** SW 146-5020,5030

*Michael R. Fowler*  
Michael R. Fowler

1-25-76  
Date

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JAN 26 1996

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OFFICE

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JAN-25-1996 11:31

P:04

~~SECRET~~  
1/17/96 9:40 AM

For Wayne

Lennah Frost

EOTT

will be a week  
before she gets  
more info on  
waste to be  
disposed of.

# **EOTT ENERGY Operating Limited Partnership**

P.O. BOX 1660  
5805 E. BUSINESS 20  
MIDLAND, TEXAS 79702  
(915) 682-8251

January 25, 1996

State of New Mexico  
Oil Conservation Division  
Hobbs District Office  
P.O. Box 1980  
Hobbs, NM 88241-1980  
Attn: Wayne Price

RE: Disposal of Crude Oil Contaminated Soil  
Dawson Injection Station  
Dawson County, Texas

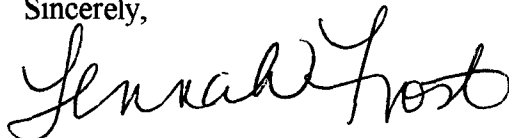
Dear Wayne:

EOTT requests permission to dispose of approximately 25 cu. yds. of non-exempt waste (crude oil contaminated soil) at Environmental Plus, Inc. near Eunice, New Mexico from our site in Texas. Attached please find copies of the analytical data from soil samples taken at the above captioned station. These tests indicate that this is non-hazardous waste.

The Texas Railroad Commission has issued EOTT a minor permit allowing us to transport this waste to EPI. Attached is a copy of the minor permit.

I've sent Charlie Bettis a signed Certificate of Waste Status along with the analytical work. Wayne, if you have any questions or need additional information, please don't hesitate to call. We would like to move the soil next week if possible. Thanks for your help in this matter.

Sincerely,



Lennah Frost  
Environmental & Safety Coordinator

cc: Al Hugh

**RECEIVED**

JAN 29 1996

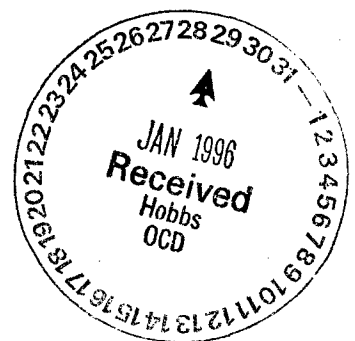
**CCD HOBBS  
OFFICE**

**RECEIVED**

JAN 2

**CCD HOBBS  
OFFICE**

**EOTT ENERGY CORP.**  
General Partner



# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT ENERGY  
ATTN: LENNAH FROST  
P.O. BOX 1660  
MIDLAND, TEXAS 79703  
FAX: 815-882-4765

Receiving Date: 01/17/96  
Sample Type: SOIL  
Project: DAWSON STA.  
Project Location: DAWSON STA.

Analysis Date: 01/17/96  
Sampling Date: 01/17/96  
Sample Condition: Intact

ELT#	FIELD CODE	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	m,p-XYLENE (mg/Kg)	o-XYLENE (mg/Kg)
6568	SOIL	<0.100	<0.100	<0.100	0.935	0.618
	% IA	102	102	107	110	114
	% EA	96	98	92	83	93
	BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8020,5030

  
Michael R. Fowler

1-25-96  
Date

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JAN 25 1996

OLD HUBER  
OFFICE

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1713

JAN-25-1996 11:31

P.04

R. 45

**EOTT ENERGY**  
**ATTN: LENNAH FROST**  
**P.O. BOX 1660**  
**MIDLAND, TEXAS 79703**  
**FAX: 915-687-2713**

Analysis Date: 01/19/96  
Sampling Date: 1/17/96  
Sample Condition: Intact

**METHODS: EPA SW-846-2.1.8.2.1.2.2.1.1**

1-25-96  
Date:

UDD HUBBS  
OFFICE

JAN-25-1996 11:31

P. 10

**ENVIRONMENTAL**

**LAB OF TEXAS, INC.**

"Don't Treat Your Soil Like Dirt!"

EOTT ENERGY  
ATTN: LENNAH FROST  
P.O. BOX 1660  
MIDLAND, TEXAS 79703  
FAX: 915-687-2713

Receiving Date: 11/17/96  
Sample Type: SOIL  
Project #: DAWSON STA.

Analysis Date: 01/24/98  
Sampling Date: 01/17/96  
Sample Condition: Intact

Field Code: DAWSON STA.

TCLP		ELT			
SEMIVOLATILE ORGANICS (ppm)	PQL	6568	BLANK	%EA	%IA
Pyridine	0.020	ND	ND		103
1,4-Dichlorobenzene	0.020	ND	ND	54	97
o-Cresol	0.020	ND	ND		100
Nitrobenzene	0.020	ND	ND		108
m,p-Cresol	0.020	ND	ND		100
Hexachloroethane	0.020	ND	ND		118
Hexachlorobutadiene	0.020	ND	ND	38	77
2,4,6-Trichlorophenol	0.020	ND	ND	72	84
2,4,5-Trichlorophenol	0.020	ND	ND		122
2,4-Dinitrotoluene	0.020	ND	ND		83
Hexachlorobenzene	0.020	ND	ND		107
Pentachlorophenol	0.100	ND	ND	123	111

ND= NOT DETECTED, < PQL

**SYSTEM MONITORING COMPOUNDS**

**% Recovery**

2-Fluorophenol

69

Phenol-d5

48

Nitrobenzene-d5

101

2-Fluorobiphenyl

110

2,4,6-Tribromophenol

116

Terphenyl-d14

88

Method: SW 846-8270.1311

*Michael R. Fowler*  
Michael R. Fowler

*1-25-96*  
Date

**RECEIVED**

JAN 29 1998

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OFFICE

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JAN-25-1996 11:30

P.02



# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT ENERGY  
ATTN: LENNAH FROST  
P.O. BOX 1660  
MIDLAND, TEXAS 79703  
FAX: 915-687-2713

RECEIVING DATE: 01/17/96  
SAMPLE TYPE: SOIL  
PROJECT: DAWSON STA.  
FIELD CODE: DAWSON STA.

ANALYSIS DATE: 01/23/96  
SAMPLING DATE: 01/17/96  
SAMPLE CONDITION: Intact

TOLP VOLATILES (ppm)	SAMPLE 6668	PQL	BLANK	%EA	%IA
1,1-Dichloroethene	ND	0.125	ND	100	115
2-Butanone	ND	25	ND		84
Chloroform	ND	0.125	ND		104
Benzene	ND	0.125	ND	105	109
1,2-Dichloroethane	ND	0.125	ND		89
Vinyl Chloride	ND	0.125	ND		87
Carbon Tetrachloride	ND	0.125	ND		91
Trichloroethene	ND	0.125	ND	104	99
Tetrachloroethene	ND	0.125	ND		95
Chlorobenzene	ND	0.125	ND	101	82
1,4-Dichlorobenzene	ND	0.125	ND		107

SYSTEM MONITORING COMPOUNDS  
dibromofluoromethane  
toluene-d8  
4-bromofluorobenzene

% RECOVERY  
99  
103  
88

ND = < PQL

PQL = PRACTICAL QUANTITATION LIMIT

Methods: EPA SW 846-8240, 1311

  
Michael R. Fowler

1-25-96  
Date

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JAN 25 1996

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OFFICE

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1713

JAN-25-1996 11:30

P.01

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT ENERGY  
ATTN: LENNAH FROST  
P.O. BOX 1860  
MIDLAND, TEXAS 79703  
FAX: 915-682-4765

Receiving Date: 01/17/96  
Sample Type: SOIL  
Project: DAWSON STA.  
Project Location: DAWSON STA.

Reporting Date: 01/23/96  
Sampling Date: 01/17/96  
Sample Condition: Intact  
Analysis Date: 01/19/96

## TCLP METALS (ppm)

ELT#	Field Code	Ag	As	Ba	Cd	Cr	Hg	Pb	Se
	EPA LIMIT	5.00	5.00	100.0	1.00	5.00	0.20	5.00	1.00
8568	SOIL	0.01	<0.002	0.64	0.01	<0.05	<0.001	0.10	<0.002
Minimum Detection Level		0.01	0.002	0.1	0.01	0.02	0.001	0.1	0.002
% IA		101	99	101	100	99	100	98	99
% EA		97	93	102	101	115	99	111	95

METHODS: EPA SW-846-1311, 7061, 7080, 7130, 7190, 7420, 7471, 7741

  
Michael R. Fowler

1-25-96  
Date

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JAN 29 1996  
OCD HUBBS  
OFFICE

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JAN-25-1996 11:32

P.05

CERTIFICATE OF WASTE STATUSNON-EXEMPT WASTE MATERIAL

Originating Location: Dawson Injection Station, Dawson  
Source: Crude oil Contaminated Soil Co, TX  
Disposal Location: EPI, Eunice, NM

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for EOTT Energy Operating  
concur with the status of the waste from the subject site  
General Partnership

Name Lennah FROST  
Title/Agency Env & Safety Coord.  
Address PO Box 1660  
MIDLAND, TX 79703  
Signature Lennah Frost  
Date 1-25-96

**RECEIVED**

JAN 29 1996  
OLD HOBBS  
OFFICE

CAROLE KEETON RYLANDER, Chairman  
BARRY WILLIAMSON, Commissioner  
CHARLES R. MATTHEWS, Commissioner



DAVID M. GARLICK  
Acting Director  
R. MARK HENKHAUS, P.E.  
District Director

# RAILROAD COMMISSION OF TEXAS

## OIL AND GAS DIVISION

January 10, 1996

EOTT Energy Operating Limited Partnership  
Attn: Lennah Frost  
P O Box 1660  
Midland Texas 79702

Re: Minor Permit No. 8A-2102  
Dawson Station  
Dawson County, Texas

Pursuant to Rule 8(d)(6)(G), you are hereby authorized to dispose of the following waste material:

Oil Contaminated Soil - 25 cu. yds.

The authorized method of disposal will be landfarming at a landfarm site near Eunice, New Mexico.

Only material generated from the above mentioned site may be disposed of at the above described disposal site. The authority granted by this letter will expire thirty days from the date of this letter.

A handwritten signature in black ink, appearing to read "Mark Henkhaus".

Mark Henkhaus, P.E.  
District Director

RMH/sjb

cc: File

**RECEIVED**

JAN 2 9 1996

OLD HUBBS  
OFFICE

District I - (505) 393-6161  
P.O. Box 1949  
Hobbs, NM 88241-1980  
District II - (505) 748-1283  
811 S. First  
Artesia, NM 88210  
District III - (505) 334-6178  
1000 Rio Brazos Road  
Aztec, NM 87410  
District IV - (505) 827-7131

New Mexico  
Energy Minerals and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

Form C-138  
Originated 4/18/95

Submit Original  
Plus 1 Copy  
to appropriate  
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input checked="" type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> <i>N</i>	4. Generator EOTT Energy
Verbal Approval Received: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	5. Originating Site Dawson Injection Station Dawson Co., TX
2. Management Facility Destination Environmental Plus Inc.	6. Transporter EOTT Energy
3. Address of Facility Operator P.O. Box 969 Eunice, NM 88231	8. State Texas
7. Location of Material (Street Address or ULSTR) Dawson Injection Station Dawson, Texas	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.  All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Contaminated soil from EOTT'S Dawson Injection Station located in Dawson County, Texas.

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JAN 29 1996

Environmental Bureau  
Oil Conservation Division

JAN 16 1996

OFFICE

Estimated Volume 25 yds cy Known Volume (to be entered by the operator at the end of the haul) \_\_\_\_\_ cy

SIGNATURE: Charlie Bettis TITLE: PRESIDENT DATE: 1-15-96  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: Charlie Bettis TELEPHONE NO. 394-3481

(This space for State Use)

APPROVED BY: Wayne Price TITLE: ENR ENGR. DATE: 1/26/96

APPROVED BY: C. Surtice TITLE: GEOLOGIST DATE: 1-27-96

# **EOTT ENERGY Operating Limited Partnership**

P.O. BOX 1660  
5805 E. BUSINESS 20  
MIDLAND, TEXAS 79702  
(915) 682-8251

January 8, 1996

Environmental Plus, Inc.  
Box 969  
Eunice, NM 88231  
Attn: Charlie Bettis

RE: Disposal of Crude Oil Contaminated Soil  
Dawson Injection Station, Texas

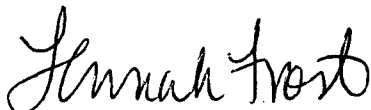
Dear Charlie:

Per our conversation today, EOTT would like to dispose of approximately 25 yards of contaminated soil from our Dawson Injection Station located in Dawson County, Texas. The Texas Railroad Commission has issued Minor Permit #8A-2102 permitting us to dispose of the waste at your landfarm in New Mexico.

Attached is the lab report on THP levels in the soil from the site. The OCD has indicated that there shouldn't be a problem with us transporting the soil from Texas into New Mexico, pending TRRC Approval, lab reports and your request for disposal.

The TRRC Minor Permit is good for 30 days from today so we would like to complete this project as soon as possible. Thanks for your help in this matter.

Sincerely,



Lennah Frost  
Environmental & Safety Coordinator

/ld  
attachment

cc: Al Hugh  
John Walke

**RECEIVED**

JAN 16 1996

ENVIRONMENTAL  
OFFICE

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT ENERGY  
ATTN: MRS. LENNAH FROST  
P.O. BOX 1660  
MIDLAND, TEXAS 79703  
FAX: 915-682-4765

RECEIVING DATE: 12/19/95  
SAMPLE TYPE: SOIL  
PROJECT #: DAWSON STATION

ANALYSIS DATE: 12/19/95  
SAMPLING DATE: NONE GIVEN  
SAMPLE CONDITION: INTACT

ELT#	FIELD CODE	TPH (mg/kg)
6440	DAWSON STATION	63.500
	QUALITY CONTROL	936
	TRUE VALUE	936
	% PRECISION	100

Methods: EPA 418.1

  
Michael R. Fowler

12-20-95  
Date

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JAN 16 1996

LABORATORY  
OFFICE

## FAX COVER SHEET

**EOTT ENERGY CORP.**  
**GENERAL PARTNERSHIP FOR**  
**EOTT ENERGY OPERATING LIMITED PARTNERSHIP**  
**AND**  
**EOTT ENERGY PIPELINE LIMITED PARTNERSHIP**  
5805 E. Highway 80  
P.O. Box 1660  
Midland, Texas 79702  
Main Telephone Number: 915-687-0783  
Fax Number: 915-682-2781

TOTAL NUMBER OF PAGES: 8  
(INCLUDING THIS COVER PAGE)

DATE: 1-25-96

TO: NAME:

Wayne Price

COMPANY/DEPT.:

OCD

FAX NUMBER:

TEL. NUMBER/EXT.:

FROM: NAME:

Lennah Frost

DEPT./CITY:

TEL. NUMBER/EXT.:

915/687-2040 X-34

COMMENTS:

Wayne - Please Call  
me as soon as you  
receive this.

**IMPORTANT/CONFIDENTIAL:** The information contained in this facsimile message is legally privileged and/or confidential information initially intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or a representative of that intended recipient, you are hereby notified that any dissemination, distribution or copying of this telecopy is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and return the original message to us at the address above via the U.S. Postal Service. Thank You.

In case of a problem with this fax, please call our main telephone number: 915-687-0783.  
Thank You.

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JAN 26 1996

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OFFICE



**CERTIFICATE OF WASTE STATUS****NON-EXEMPT WASTE MATERIAL**

Originating Location: Dawson Injection Station, Dawson  
Source: Crude oil Contaminated soil Co, TX  
Disposal Location: EPI, Eunice, NM

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or listed waste pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b)."

I, the undersigned as the agent for EOTT Energy Operating  
concur with the status of the waste from the subject site General Partnership

Name

Lennah FROST

Title/Agency

ENV & Safety Coord.

Address

PO Box 1660  
MIDLAND, TX 79703

Signature

Lennah Frost

Date

1-25-96**RECEIVED**

JAN 26 1996

JOE HUBBS  
OFFICE

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt"

EOTT ENERGY  
ATTN: LENNAH FROST  
P.O. BOX 1880  
MIDLAND, TEXAS 79703  
FAX: 915-692-4765

Receiving Date: 01/17/96  
Sample Type: SOIL  
Project: DAWSON STA.  
Project Location: DAWSON STA.

Reporting Date: 01/25/96  
Sampling Date: 01/17/96  
Sample Condition: Intact  
Analysis Date: 01/18/96

## TCLP METALS (ppm)

ELT#	Field Code	Ag	As	Ba	Cd	Cr	Hg	Pb	Se
	EPA LIMIT	5.00	5.00	100.0	1.00	5.00	0.20	5.00	1.00
6586	SOIL	0.01	<0.002	0.64	0.01	<0.05	<0.001	0.10	<0.002
Minimum Detection Level		0.01	0.002	0.1	0.01	0.02	0.001	0.1	0.002
% IA		101	99	101	100	98	100	98	99
% EA		97	93	102	101	115	99	111	95

METHODS: EPA SW 846-1311, 7061, 7060, 7760, 7130, 7150, 7420, 7471, 7741

  
Michael R. Fowler

1-25-96  
Date

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12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1713

JAN-25-1996 11:32

P.05

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT ENERGY  
ATTN: LENNAH FROST  
P.O. BOX 1880  
MIDLAND, TEXAS 79703  
FAX: 915-687-2713

RECEIVING DATE: 01/17/96  
SAMPLE TYPE: SOIL  
PROJECT: DAWSON STA.  
FIELD CODE: DAWSON STA.

ANALYSIS DATE: 01/23/96  
SAMPLING DATE: 01/17/96  
SAMPLE CONDITION: Intact

TCLP VOLATILES (ppm)	SAMPLE 6688	PQL	BLANK	%EA	%IA
1,1-Dichloroethene	ND	0.125	ND	100	115
2-Butanone	ND	25	ND		84
Chloroform	ND	0.125	ND		104
Benzene	ND	0.125	ND	105	108
1,2-Dichloroethene	ND	0.125	ND		89
Vinyl Chloride	ND	0.125	ND		87
Carbon Tetrachloride	ND	0.125	ND		91
Trichloroethene	ND	0.125	ND	104	89
Tetrachloroethene	ND	0.125	ND		85
Chlorobenzene	ND	0.125	ND	101	82
1,4-Dichlorobenzene	ND	0.125	ND		107

SYSTEM MONITORING COMPOUNDS  
dibromofluoromethane  
toluene-d8  
4-bromofluorobenzene

% RECOVERY  
90  
103  
88

ND = < PQL  
PQL = PRACTICAL QUANTITATION LIMIT  
Methods: EPA SW 846-8240, 1811

  
Michael R. Fowler

1-25-96  
Date

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# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt"

EOTT ENERGY  
ATTN: LENNAH FROST  
P.O. BOX 1680  
MIDLAND, TEXAS 79703  
FAX: 915-687-2713

Receiving Date: 11/17/96  
Sample Type: SOIL  
Project #: DAWSON STA.

Analysis Date: 01/24/98  
Sampling Date: 01/17/96  
Sample Condition: Intact

Field Code: DAWSON STA

TCLP SEMI-VOLATILE ORGANICS (ppm)	PQL	ELT# 6588	BLANK	%EA	%IA
Pyridine	0.020	ND	ND		103
1,4-Dichlorobenzene	0.020	ND	ND	54	97
o-Cresol	0.020	ND	ND		100
Nitrobenzene	0.020	ND	ND		108
m,p-Cresol	0.020	ND	ND		100
Hexachloroethane	0.020	ND	ND		118
Hexachlorobutadiene	0.020	ND	ND	28	77
2,4,6-Trichlorophenol	0.020	ND	ND	72	84
2,4,5-Trichlorophenol	0.020	ND	ND		122
2,4-Dinitrotoluene	0.020	ND	ND		83
Hexachlorobenzene	0.020	ND	ND		107
Pentachlorophenol	0.100	ND	ND	123	111

ND= NOT DETECTED, < PQL

## SYSTEM MONITORING COMPOUNDS

	% Recovery
2-Fluorophenol	88
Phenol-d5	48
Nitrobenzene-d5	101
2-Fluorobiphenyl	110
2,4,6-Tribromophenol	118
Terphenyl-d14	88

Method: BW 445-8270.1211

  
Michael R. Fowler

1-25-96  
Date

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P.02



# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT ENERGY  
ATTN: LENNAH FROST  
P.O. BOX 1600  
MIDLAND, TEXAS 79708  
FAC: 915-832-4785

Receiving Date: 01/17/96  
Sample Type: SOIL  
Project: DAWSON STA.  
Project Location: DAWSON STA.

Analysis Date: 01/17/96  
Sampling Date: 01/17/96  
Sample Condition: Intact

ELT#	FIELD CODE	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYLBENZENE (mg/Kg)	m,p-XYLENE (mg/Kg)	o-XYLENE (mg/Kg)
0588	SOIL	<0.100	<0.100	<0.100	0.935	0.918
% IA		102	102	107	110	114
% EA		98	98	92	99	99
BLANK		<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-6020,5030

  
Michael R. Fowler

1-25-96  
Date

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OLD HUBBS  
OFFICE

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P.04

DISTRICT I

PO Box 1080

Alamogordo, NM 88311-1080

DISTRICT II

PO Drawer 140

Artesia, NM 88211-0719

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

OIL CONSERVATION DIVISION  
RECEIVED

DISTRICT III

1000 Rio Grande Rd.

Alamogordo, NM 87410

DISTRICT IV

PO Box 3088

Santa Fe, NM 87508

'95 JUL 25 AM 8 52

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE		XXXXXXXXXXXXXXXXXXXXXXX
1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> Verbal Approval Received: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	4. Generator TEXACO USA	
2. Destination Environmental Plus, Inc.	5. Name of Originating Site # 2 Plant	
3. Address of Facility Operator P.O. Box 969 Farmington, N.M. 88231	6. Name of Transporter	
7. Location of Material (Street Address or ULSTR) Texaco North Plant	8. State New Mexico	
9. <u>Circle One</u> A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-oilfield exempt wastes will be accompanied by a certification of waste status from the Generator and the New Mexico Environment Department or other appropriate government agency; two certificates per job. <input checked="" type="radio"/> C. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analyses to prove the material is non-hazardous and the Generator's certification of origin. No waste classified as hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.		

BRIEF DESCRIPTION OF THE MATERIAL:

Cooling tower: Texaco is in the process of cleaning out of the old cooling basin. This material (approx. 50 yds) is being placed into two roll-off type bins. This cooling tower had been on a chromate type chemical treatment a number of years ago.

Two waste piles of contaminated dirt that is from the main plant process areas. This dirt has primarily been removed from around and under the engine-compressor (inlet-interstage-outlet) piping areas. It is contaminated with cooling water, used oils, and miscellaneous waste associated with the operation of these units.

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JUL 21 1995

JOJO HOBBS  
OFFICE

Estimated Volume 200 yards + cy Known Volume (to be entered by the operator at the end of the haul):  
I hereby certify that the information above is true and complete to the best of my knowledge and belief.  
SIGNATURE Charlie Bettis TITLE President DATE 7-17-95  
TYPE OR PRINT NAME Charlie Bettis TELEPHONE NO. 505-394-3481

(This space for State Use)

APPROVED BY [Signature] TITLE ELVIN EAGAN DATE 7/21/95  
APPROVED BY [Signature] TITLE GEOLOGIST DATE 8-8-95

CERTIFICATE OF WASTE STATUS  
NON-EXEMPT WASTE MATERIAL

Originating Location: Texaco Eunice North Gas Plant

Source: Dirt from process areas of plant. Roll of Boxes contain waste from cooling tower bottoms.

Disposal Locations: Environmental Plus Corporation

As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1968 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40CFR part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no hazardous or listed waste pursuant to the provisions of 40CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a hazardous waste pursuant to the provisions of 40 CFR section 261.3 (b).

I the undersigned as the agent for the Texaco Gas Plant concur with the status of the waste from the subject site.

Name: Rodney G. Bailey

Title/Agency: EHS Coordinator

Address: Box 1929, Eunice NM 88231

signature: Rodney G. Bailey

Date: 7-20-95

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**JUL 21 1995**

**UCD HOBBS  
OFFICE**





## Environmental Analytical Services

4-2082-1-4

## Chain of Custody Record

Project I.D. NO27L Pheno

Project Location 30422E

Sampled By Allen Wood

Client Name Environmnetal Price Control

Address 22. Box 5890 / No 201 RM 872394

Telephone 505-392-6161 / Fax 392-5005

118 S. Commercial Ave.

Farmington, NM 87401

505-326-4669

FAX 505-326-4535

**101 E. Marland**

Hobbs, NM 88240

505-393-2326

**FAX 505-393-2476**

Sample Number	Date	Time	Composite	Grab	Sample Location	Number of Containers	Analysis Required	Remarks (Type sample, preservation, etc.)
1	4/25/95	1200			Room #1	1	X	
2					Room #2	1	X	
3					Room off Room #1	1	X	
4					Room off Room #2	1	X	

Released by: (Signature) \_\_\_\_\_  
 Released by: (Signature) \_\_\_\_\_

Date: 4/25/95 Time: 1200  
 Date: \_\_\_\_\_ Time: \_\_\_\_\_  
 Received by: (Signature) \_\_\_\_\_  
 Received by: (Signature) \_\_\_\_\_

PLEASE NOTE: Liability and Damages, Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for the analysis. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the

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# ARDINAL LABORATORIES

PHONE (815) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 383-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 325-4569 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

## ANALYTICAL RESULTS FOR ENVIRONMENTAL SPILL CONTROL

ATTN: ALLEN HODGE

**PO BOX 5890**

HOBBS, NM 88240

**FAX TO: 505-397-5085**

Receiving Date: 06/28/95  
Reporting Date: 07/06/95  
Project Number: NONE GIVEN  
Project Name: NORTH PLANT  
Project Location: EUNICE

Sampling Date: 06/28/95 ✓  
Sample Type: SOIL  
Sample Condition: INTACT  
Sample Received By: GAP  
Analyzed By: JH

**TCLP METALS**

LAB NUMBER    SAMPLE ID

**As**  
**ppm**

Ag  
ppm

ppm

**Cd**  
**ppm**

Cr  
ppm

Pb  
ppm

**Hg**  
**ppm**

So  
ppm

[illegible]

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**JUL 21 1995**

OLD HOBBS  
OFFICE

7-6-95

Date \_\_\_\_\_

**Jane Huang, Chemist**

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# CARDINAL LABORATORIES

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PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

## ANALYTICAL RESULTS FOR ENVIRONMENTAL SPILL CONTROL

ATTN: ALLEN HODGE

PO BOX 5890

HOBBS, NM 88240

FAX TO: 505-397-5085

Receiving Date: 06/28/95  
Reporting Date: 07/05/95  
Project Number: NONE GIVEN  
Project Name: NORTH PLANT  
Project Location: EUNICE  
Lab Number: H2082-4  
Sample ID: ROLL OFF BOX # 2

Analysis Date: 07/03/95  
Sampling Date: 06/28/95  
Sample Type: SOIL  
Sample Condition: INTACT  
Sample Received By: GAP  
Analyzed By: BC

TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Detection Limit	Sample Result H2082-4	Method Blank	QC	%IA	True Value QC
Pyridine	5.00	0.002	<0.080	<0.002	101.0	101	100
1,4-Dichlorobenzene	7.50	0.002	<0.080	<0.002	98.8	99	100
o-Cresol	200	0.002	<0.080	<0.002	99.8	100	100
m, p-Cresol	200	0.004	<0.016	<0.004	202.0	101	200
Hexachloroethane	3.00	0.002	<0.080	<0.002	99.7	100	100
Nitrobenzene	2.00	0.002	<0.080	<0.002	103.0	103	100
Hexachloro-1,3-butadiene	0.500	0.002	<0.080	<0.002	99.0	99	100
2,4,6-Trichlorophenol	2.00	0.002	<0.080	<0.002	94.4	94	100
2,4,5-Trichlorophenol	400	0.002	<0.080	<0.002	99.0	99	100
2,4-Dinitrotoluene	0.130	0.002	<0.080	<0.002	100.0	100	100
Hexachlorobenzene	0.130	0.002	<0.080	<0.002	99.1	99	100
Pentachlorophenol	100	0.002	<0.080	<0.002	99.8	100	100

	% RECOVERY	RELATIVE PERCENT DIFFERENCE
Fluorophenol	MI(17)*	19
Phenol-d5	MI(11)*	16
Nitrobenzene-d5	61	20
2-Fluorobiphenyl	83	19
2,4,6-Tribromophenol	71	17
Terphenyl-d14	79	17

METHODS: EPA SW 846-8270

\*Matrix interference

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JUL 21 1995

UCC HOBBS  
OFFICE

*Burgess J.A. Cooke*  
Burgess J.A. Cooke, Ph. D.

7/5/95  
Date

PLEASE NOTE: Liability and Damages. CARDINAL's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by CARDINAL within thirty (30) days after completion of the applicable service. In no event shall CARDINAL be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by CARDINAL, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



# CARDINAL LABORATORIES

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PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

## ANALYTICAL RESULTS FOR ENVIRONMENTAL SPILL CONTROL

ATTN: ALLEN HODGE

PO BOX 5890

HOBBS, NM 88240

FAX TO: 505-397-5085

Receiving Date: 06/28/95

Reporting Date: 07/05/95

Project Number: NONE GIVEN

Project Name: NORTH PLANT

Project Location: EUNICE

Lab Number: H2082-2

Sample ID: PILE # 2

Analysis Date: 07/05/95

Sampling Date: 06/28/95

Sample Type: SOIL

Sample Condition: INTACT

Sample Received By: GAP

Analyzed By: BC

TCLP VOLATILES (ppm)	EPA LIMIT	Detection Limit	Sample Result H2082-2	Method Blank	QC	%IA	True Value QC
Vinyl chloride	0.20	0.001	<0.020	<0.001	116.0	116	100
1,1-Dichloroethylene	0.70	0.001	<0.020	<0.001	109.0	109	100
Methyl ethyl ketone	200.00	0.001	<0.020	<0.001	119.0	119	100
Chloroform	6.00	0.001	<0.020	<0.001	107.0	107	100
1,2-Dichloroethane	0.50	0.001	<0.020	<0.001	100.0	100	100
Benzene	0.50	0.001	<0.020	<0.001	120.0	120	100
Carbon tetrachloride	0.50	0.001	<0.020	<0.001	106.0	106	100
Trichloroethylene	0.50	0.001	<0.020	<0.001	117.0	117	100
Tetrachloroethylene	0.70	0.001	<0.020	<0.001	104.0	104	100
Chlorobenzene	100.00	0.001	<0.020	<0.001	96.6	97	100
1,4-Dichlorobenzene	7.50	0.001	<0.020	<0.001	96.9	97	100

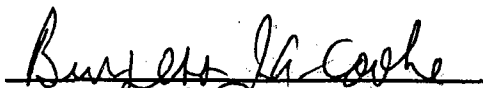
	% Recovery	Relative Percent Difference
Dibromofluoromethane	112	17
Toluene - d8	126	5
Bromofluorobenzene	73	18

METHODS: EPA SW-846-8260, 1311

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7/5/95  
Date

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PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

## ANALYTICAL RESULTS FOR ENVIRONMENTAL SPILL CONTROL

ATTN: ALLEN HODGE

PO BOX 5890

HOBBS, NM 88240

FAX TO: 505-397-5085

Sampling Date: 06/28/95

Sample Type: SOIL

Sample Condition: INTACT

Sample Received By: GAP

Analyzed By: GAP & SL

Receiving Date: 06/28/95

Reporting Date: 07/06/95

Project Number: NONE GIVEN

Project Name: NORTH PLANT

Project Location: EUNICE

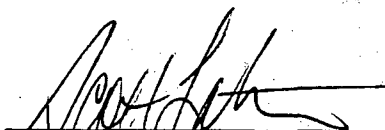
LAB NUMBER	SAMPLE ID	REACTIVITY			
		Sulfide (ppm)	Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY (°F)
ANALYSIS DATE:		07/06/95	07/06/95	07/06/95	06/29/95
H2082-1	PILE # 1	5	6	8.85 /	>140
H2082-2	PILE # 2	5	15	10.93 /	>140
H2082-3	ROLL OF BOX # 1	25	12	9.00 /	>140
H2082-4	ROLL OF BOX # 2	30	29	9.22 /	>140
Quality Control		NR	NR	6.99	NR
True Value QC		NR	NR	7.00	NR
% Accuracy		NR	NR	100	NR
Relative Percent Difference		NR	NR	0	NR

METHOD: EPA SW 846-7.3, 7.2, 1010

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Scott A. Latimer, Chemist

7-6-95  
Date

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TO: Chris Eustice

CC: Jerry Sexton  
Wayne Price

SUBJECT: EPI-Texaco Solid Waste Approval.

PRIORITY: 4

ATTACHMENTS:

Dear Chris,

I am sending up the complete TCLP results per your  
with Texaco supplied them to me today.

Thanks!

-Wayne will handle this  
He'll call for more info.  
-I denied, or held, this  
because all analytical was not  
provided.



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PHONE (505) 326-4680 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

ANALYTICAL RESULTS FOR  
ENVIRONMENTAL SPILL CONTROL  
ATTN: ALLEN HODGE  
PO BOX 5890  
HOBBS, NM 88240  
FAX TO: 505-387-5085

Receiving Date: 08/28/95  
Reporting Date: 07/06/95  
Project Number: NONE GIVEN  
Project Name: NORTH PLANT  
Project Location: EUNICE

Sampling Date: 08/28/95  
Sample Type: SOIL  
Sample Condition: INTACT  
Sample Received By: GAP  
Analyzed By: JH

TCLP METALS

LAB NUMBER SAMPLE ID

As ppm Ag ppm Ba ppm Cd ppm Cr ppm Pb ppm Hg ppm Se ppm

ANALYSIS DATE:	07/05/92	07/05/92	07/05/92	07/05/92	07/05/92	07/05/92	07/05/92	07/05/92	07/05/92
EPA LIMITS:	5	5	100	1	5.0	5.0	0.2	1.0	
H2082-1 FILE # 1	<0.1	<0.1	0.49	<0.1	<0.1	<0.1	<0.0002	<0.1	
H2082-2 FILE # 2	<0.1	<0.1	0.45	<0.1	<0.1	<0.1	<0.0002	<0.1	
H2082-3 ROLL OF BOX # 1	<0.1	<0.1	0.53	<0.1	0.80	<0.1	0.0017	<0.1	
H2082-4 ROLL OF BOX # 2	<0.1	<0.1	0.53	<0.1	0.83	<0.1	0.0021	<0.1	
Quality Control	0.468	0.493	0.519	0.483	0.512	0.498	0.0109	0.476	
True Value QC	0.500	0.600	0.500	0.500	0.600	0.500	0.0100	0.500	
% Accuracy	94	99	104	97	102	100	109	95	
Relative Percent Difference	5.6	12.5	2.2	5.2	5.5	7.2	4.5	5.1	

METHODS: EPA 800/4-91/010	200.7	200.7	200.7	200.7	200.7	200.7	245.1	200.7	
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*Jane Huang*  
Jane Huang, Chemist

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PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

ANALYTICAL RESULTS FOR  
ENVIRONMENTAL SPILL CONTROL  
ATTN: ALLEN HODGE  
PO BOX 5890  
HOBBS, NM 88240  
FAX TO: 505-397-5085

Receiving Date: 06/28/95  
Reporting Date: 07/08/95  
Project Number: NONE GIVEN  
Project Name: NORTH PLANT  
Project Location: EUNICE

Sampling Date: 06/28/95  
Sample Type: SOIL  
Sample Condition: INTACT  
Sample Received By: GAP  
Analyzed By: GAP & SL

LAB NUMBER	SAMPLE ID	REACTIVITY		CORROSIVITY (pH)	IGNITABILITY (°F)
		Sulfide (ppm)	Cyanide (ppm)		
ANALYSIS DATE:		07/06/95	07/06/95	07/08/95	08/29/95
H2082-1	PILE #1	5	6	8.85	>140
H2082-2	PILE #2	5	15	10.93	>140
H2082-3	ROLL OF BOX #1	25	12	9.00	>140
H2082-4	ROLL OF BOX #2	30	29	9.22	>140
Quality Control		NR	NR	8.99	NR
True Value QC		NR	NR	7.00	NR
% Accuracy		NR	NR	100	NR
Relative Percent Difference		NR	NR	0	NR

METHOD: EPA SW 846-7.3, 7.2, 1010

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Date

  
Scott A. Langer, Chemist

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PHONE (505) 326-4669 • 116 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

ANALYTICAL RESULTS FOR  
ENVIRONMENTAL SPIL CONTROL  
ATTN: ALLEN HODGE  
PO BOX 5860  
HOBBS, NM 88240  
FAX TO: 505-397-5085

Receiving Date: 06/28/95  
Reporting Date: 07/05/95  
Project Number: NONE GIVEN  
Project Name: NORTH PLANT  
Project Location: EUNICE  
Lab Number: H2082-1  
Sample ID: PILE # 1

Analysis Date: 07/05/95  
Sampling Date: 06/28/95  
Sample Type: SOIL  
Sample Condition: INTACT  
Sample Received By: GAP  
Analyzed By: BC

TCLP VOLATILES (ppm)	EPA LIMIT	Detection Limit	Sample Result H2082-1	Method Blank	QC	%IA	True Value QC
Vinyl chloride	0.20	0.001	<0.020	<0.001	116.0	116	100
1,1-Dichloroethylene	0.70	0.001	<0.020	<0.001	109.0	109	100
Methyl ethyl ketone	200.00	0.001	<0.020	<0.001	119.0	119	100
Chloroform	6.00	0.001	<0.020	<0.001	107.0	107	100
1,2-Dichloroethane	0.50	0.001	<0.020	<0.001	100.0	100	100
Benzene	0.50	0.001	<0.020	<0.001	120.0	120	100
Carbon tetrachloride	0.50	0.001	<0.020	<0.001	106.0	106	100
Trichloroethylene	0.50	0.001	<0.020	<0.001	117.0	117	100
Tetrachloroethylene	0.70	0.001	<0.020	<0.001	104.0	104	100
Chlorobenzene	100.00	0.001	<0.020	<0.001	96.6	97	100
1,4-Dichlorobenzene	7.50	0.001	<0.020	<0.001	98.9	97	100

	% Recovery	Relative Percent Difference
Dibromofluoromethane	114	17
Toluene - d8	125	5
Bromofluorobenzene	87	18

METHODS: EPA SW-846-8280, 1311

*Burgess J. A. Cooke*  
Burgess J. A. Cooke, Ph. D.

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PHONE (505) 328-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

ANALYTICAL RESULTS FOR  
ENVIRONMENTAL SPIL CONTROL  
ATTN: ALLEN HODGE  
PO BOX 5890  
HOBBS, NM 88240  
FAX TO: 605-397-5085

Receiving Date: 06/28/95  
Reporting Date: 07/03/95  
Project Number: NONE GIVEN  
Project Name: NORTH PLANT  
Project Location: EUNICE  
Lab Number: H2082-1  
Sample ID: FILE # 1

Analyte Date: 07/03/95  
Sampling Date: 06/28/95  
Sample Type: SOIL  
Sample Condition: INTACT  
Sample Received By: GAP  
Analyzed By: BC

TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Detection Limit	Sample Result H2082-1	Method Blank	QC	%IA	True Value QC
Pyridine	5.00	0.002	<0.080	<0.002	101.0	101	100
1,4-Dichlorobenzene	7.50	0.002	<0.080	<0.002	98.8	99	100
o-Cresol	200	0.002	<0.080	<0.002	99.8	100	100
m, p-Cresol	200	0.004	<0.016	<0.004	202.0	101	200
Hexachloroethane	3.00	0.002	<0.080	<0.002	99.7	100	100
Nitrobenzene	2.00	0.002	<0.080	<0.002	103.0	103	100
Hexachloro-1,3-butadiene	0.500	0.002	<0.080	<0.002	99.0	99	100
2,4,6-Trichlorophenol	2.00	0.002	<0.080	<0.002	84.4	84	100
2,4,6-Trichlorophenol	400	0.002	<0.080	<0.002	99.0	99	100
2,4-Dinitrotoluene	0.130	0.002	<0.080	<0.002	100.0	100	100
Hexachlorobenzene	0.130	0.002	<0.080	<0.002	99.1	99	100
Pentachlorophenol	100	0.002	<0.080	<0.002	99.8	100	100

	% RECOVERY	RELATIVE PERCENT DIFFERENCE
Fluorophenol	MI(29)*	19
Phenol-d5	MI(17)*	16
Nitrobenzene-d5	99	20
2-Fluorobiphenyl	111	19
2,4,6-Tribromophenol	104	17
Terphenyl-d14	106	17

METHODS: EPA SW 846-8270

\*Matrix Interference

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*Burgess A. Cooke*  
Burgess A. Cooke, Ph. D.

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PHONE (505) 326-4689 • 118 S. COMMERCIAL AVE • FARMINGTON, NM 87401

ANALYTICAL RESULTS FOR  
ENVIRONMENTAL SPILL CONTROL  
ATTN: ALLEN HODGE  
PO BOX 5890  
HOBBS, NM 88240  
FAX TO: 505-397-5085

Receiving Date: 06/28/95  
Reporting Date: 07/05/95  
Project Number: NONE GIVEN  
Project Name: NORTH PLANT  
Project Location: EUNICE  
Lab Number: H2082-2  
Sample ID: PILE # 2

Analysis Date: 07/05/95  
Sampling Date: 06/28/95  
Sample Type: SOIL  
Sample Condition: INTACT  
Sample Received By: GAP  
Analyzed By: BG

TCLP VOLATILES (ppm)	EPA LIMIT	Detection Limit	Sample Result H2082-2	Method Blank	QC	%IA	True Value QC
Vinyl chloride	0.20	0.001	<0.020	<0.001	116.0	116	100
1,1-Dichloroethylene	0.70	0.001	<0.020	<0.001	109.0	109	100
Methyl ethyl ketone	200.00	0.001	<0.020	<0.001	119.0	119	100
Chloroform	6.00	0.001	<0.020	<0.001	107.0	107	100
1,2-Dichloroethane	0.50	0.001	<0.020	<0.001	100.0	100	100
Benzene	0.50	0.001	<0.020	<0.001	120.0	120	100
Carbon tetrachloride	0.50	0.001	<0.020	<0.001	108.0	108	100
Trichloroethylene	0.50	0.001	<0.020	<0.001	117.0	117	100
Tetrachloroethylene	0.70	0.001	<0.020	<0.001	104.0	104	100
Chlorobenzene	100.00	0.001	<0.020	<0.001	96.6	97	100
1,4-Dichlorobenzene	7.50	0.001	<0.020	<0.001	95.9	97	100

	% Recovery	Relative Percent Difference
Dibromofluoromethane	112	17
Toluene - d8	126	5
Bromofluorobenzene	73	18

METHODS: EPA SW-846-8260, 1311

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Burgess J. A. Cooke, Ph.D.

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PHONE (505) 328-4889 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

ANALYTICAL RESULTS FOR  
ENVIRONMENTAL SPILL CONTROL

ATTN: ALLEN HODGE

PO BOX 5890

HOBBS, NM 88240

FAX TO: 505-397-5085

Receiving Date: 06/28/95

Reporting Date: 07/05/95

Project Number: NONE GIVEN

Project Name: NORTH PLANT

Project Location: EUNICE

Lab Number: H2082-2

Sample ID: PILE #2

Analysis Date: 07/03/95

Sampling Date: 06/28/95

Sample Type: SOIL

Sample Condition: INTACT

Sample Received By: GAP

Analyzed By: BC

TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Detection Limit	Sample Result H2082-2	Method Blank	QC	%IA	True Value QC
Pyridine	5.00	0.002	<0.080	<0.002	101.0	101	100
1,4-Dichlorobenzene	7.50	0.002	<0.080	<0.002	98.8	99	100
o-Cresol	200	0.002	<0.080	<0.002	99.8	100	100
m, p-Cresol	200	0.004	<0.016	<0.004	202.0	101	200
Hexachloroethane	3.00	0.002	<0.080	<0.002	99.7	100	100
Nitrobenzene	2.00	0.002	<0.080	<0.002	103.0	103	100
Hexachloro-1,3-butadiene	0.500	0.002	<0.080	<0.002	99.0	99	100
2,4,6-Trichlorophenol	2.00	0.002	<0.080	<0.002	94.4	94	100
2,4,5-Trichlorophenol	400	0.002	<0.080	<0.002	99.0	99	100
2,4-Dinitrotoluene	0.130	0.002	<0.080	<0.002	100.0	100	100
Hexachlorobenzene	0.130	0.002	<0.080	<0.002	99.1	99	100
Pentachlorophenol	100	0.002	<0.080	<0.002	99.8	100	100

	% RECOVERY	RELATIVE PERCENT DIFFERENCE
Fluorophenol	MI(19)*	19
Phenol-d5	MI(14)*	16
Nitrobenzene-d5	81	20
2-Fluorobiphenyl	69	19
2,4,6-Tribromophenol	78	17
Terphenyl-d14	75	17

METHODS: EPA SW 846-8270

\*Matrix interference

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OFFICE7/5/95  
Date

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PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE • FARMINGTON, NM 87401

**ANALYTICAL RESULTS FOR  
ENVIRONMENTAL SPILL CONTROL**

ATTN: ALLEN HODGE

PO BOX 5890

HOBBS, NM 88240

FAX TO: 505-397-5085

Receiving Date: 06/28/95

Reporting Date: 07/05/95

Project Number: NONE GIVEN

Project Name: NORTH PLANT

Project Location: EUNICE

Lab Number: H2082-3

Sample ID: ROLL OFF BOX # 1

Analysis Date: 07/03/95

Sampling Date: 06/28/95

Sample Type: SOIL

Sample Condition: INTACT

Sample Received By: GAP

Analyzed By: BC

TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Detection Limit	Sample Result H2082-3	Method Blank	QC	%IA	True Value QC
Pyridine	5.00	0.002	<0.080	<0.002	101.0	101	100
1,4-Dichlorobenzene	7.50	0.002	<0.080	<0.002	98.8	99	100
o-Cresol	200	0.002	<0.080	<0.002	99.8	100	100
m, p-Cresol	200	0.004	<0.018	<0.004	202.0	101	200
Hexachloroethane	3.00	0.002	<0.080	<0.002	99.7	100	100
Nitrobenzene	2.00	0.002	<0.080	<0.002	103.0	103	100
Hexachloro-1,3-butadiene	0.500	0.002	<0.080	<0.002	99.0	99	100
2,4,6-Trichlorophenol	2.00	0.002	<0.080	<0.002	94.4	94	100
2,4,6-Trichlorophenol	400	0.002	<0.080	<0.002	99.0	99	100
2,4-Dinitrotoluene	0.130	0.002	<0.080	<0.002	100.0	100	100
Hexachlorobenzene	0.130	0.002	<0.080	<0.002	99.1	99	100
Pentachlorophenol	100	0.002	<0.080	<0.002	99.8	100	100

	% RECOVERY	RELATIVE PERCENT DIFFERENCE
Fluorophenol	MI(24)*	19
Phenol-d5	MI(18)*	16
Nitrobenzene-d5	82	20
2-Fluorobiphenyl	89	19
2,4,6-Tribromophenol	80	17
Terphenyl-d14	97	17

METHODS: EPA SW 846-8270

\*Matrix Interference

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AUG 03 1995

JCD HOBBS  
OFFICE

7/5/95  
Date

*Burgess J. A. Cooke, Ph. D.*  
Burgess J. A. Cooke, Ph. D.

PLEASE NOTE: Liability and Damages. CARDINAL's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by CARDINAL within thirty (30) days after completion of the applicable service. In no event shall CARDINAL be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by CARDINAL, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



PHONE (915) 573-7001 • 2111 BEECHWOOD • ABILENE, TX 79603  
PHONE (505) 393-2328 • 101 E. MARLAND • HOBBS, NM 88240  
PHONE (505) 326-4689 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

ANALYTICAL RESULTS FOR  
ENVIRONMENTAL SPILL CONTROL  
ATTN: ALLEN HODGE  
PO BOX 5880  
HOBBS, NM 88240  
FAX TO: 505-397-6085

Receiving Date: 06/28/95  
Reporting Date: 07/05/95  
Project Number: NONE GIVEN  
Project Name: NORTH PLANT  
Project Location: EUNICE  
Lab Number: H2082-3  
Sample ID: ROLL OFF BOX # 1

Analysis Date: 07/05/95  
Sampling Date: 06/28/95  
Sample Type: SOIL  
Sample Condition: INTACT  
Sample Received By: GAP  
Analyzed By: EC

TCLP VOLATILES (ppm)	EPA LIMIT	Detection Limit	Sample Result H2082-3	Method Blank	QC	%IA	True Value QC
Vinyl chloride	0.20	0.001	<0.020	<0.001	116.0	116	100
1,1-Dichloroethylene	0.70	0.001	<0.020	<0.001	109.0	109	100
Methyl ethyl ketone	200.00	0.001	<0.020	<0.001	119.0	119	100
Chloroform	8.00	0.001	<0.020	<0.001	107.0	107	100
1,2-Dichloroethane	0.50	0.001	<0.020	<0.001	100.0	100	100
Benzene	0.50	0.001	<0.020	<0.001	120.0	120	100
Carbon tetrachloride	0.50	0.001	<0.020	<0.001	106.0	106	100
Trichloroethylene	0.50	0.001	<0.020	<0.001	117.0	117	100
Tetrachloroethylene	0.70	0.001	<0.020	<0.001	104.0	104	100
Chlorobenzene	100.00	0.001	<0.020	<0.001	96.8	97	100
1,4-Dichlorobenzene	7.50	0.001	<0.020	<0.001	96.9	97	100

	% Recovery	Relative Percent Difference
Dibromofluoromethane	122	17
Toluene - d8	121	5
Bromofluorobenzene	91	16

METHODS: EPA SW-846-8260, 1311

Burgess J. A. Cooke, Ph. D.

RECEIVED

AUG 03 1995

UCD HOBBS  
OFFICE

7/5/95  
Date

PLEASE NOTE: Liability and Damages: CARDINAL's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by the client for the analysis. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by CARDINAL within thirty (30) days after completion of the applicable service. In no event shall CARDINAL be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by CARDINAL, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



PHONE (915) 873-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2626 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 115 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

ANALYTICAL RESULTS FOR  
ENVIRONMENTAL SPILL CONTROL

ATTN: ALLEN HODGE

PO BOX 5890

HOBBS, NM 88240

FAX TO: 605-397-5085

Receiving Date: 06/28/95

Reporting Date: 07/03/95

Project Number: NONE GIVEN

Project Name: NORTH PLANT

Project Location: EUNICE

Lab Number: H2082-4

Sample ID: ROLL OFF BOX # 2

Analysis Date: 07/03/95

Sampling Date: 06/28/95

Sample Type: SOIL

Sample Condition: INTACT

Sample Received By: GAP

Analyzed By: BC

ICLP SEMIVOLATILES (ppm)	EPA LIMIT	Detection Limit	Sample Result H2082-4	Method Blank	QC	%IA	True Value QC
Pyridine	5.00	0.002	<0.080	<0.002	101.0	101	100
1,4-Dichlorobenzene	7.50	0.002	<0.080	<0.002	98.8	99	100
o-Cresol	200	0.002	<0.080	<0.002	99.8	100	100
m, p-Cresol	200	0.004	<0.016	<0.004	202.0	101	200
Hexachloroethane	8.00	0.002	<0.080	<0.002	99.7	100	100
Nitrobenzene	2.00	0.002	<0.080	<0.002	103.0	103	100
Hexachloro-1,3-butadiene	0.500	0.002	<0.080	<0.002	99.0	99	100
2,4,6-Trichlorophenol	2.00	0.002	<0.080	<0.002	94.4	94	100
2,4,6-Trichlorophenol	400	0.002	<0.080	<0.002	99.0	99	100
2,4-Dinitrotoluene	0.130	0.002	<0.080	<0.002	100.0	100	100
Hexachlorobenzene	0.130	0.002	<0.080	<0.002	99.1	99	100
Pentachlorophenol	100	0.002	<0.080	<0.002	99.8	100	100

	% RECOVERY	RELATIVE PERCENT DIFFERENCE
Fluorophenol	MI(17)*	19
Phenol-d5	MI(11)*	18
Nitrobenzene-d5	61	20
2-Fluorobiphenyl	83	19
2,4,6-Tribromophenol	71	17
Terphenyl-d14	78	17

METHODS: EPA SW 846-8270

\*Matrix Interference

RECEIVED

AUG 03 1995

JCD HOBBS  
OFFICE

Date

Burgess J. A. Cooks, Ph. D.

PLEASE NOTE: Liability and Damages. CARDINAL's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by CARDINAL within thirty (30) days after completion of the applicable services. In no event shall CARDINAL be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by CARDINAL, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



PHONE (915) 973-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2328 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

ANALYTICAL RESULTS FOR  
ENVIRONMENTAL SPIL CONTROL  
ATTN: ALLEN HODGE  
PO BOX 5890  
HOBBS, NM 88240  
FAX TO: 505-397-5086

Receiving Date: 06/28/95  
Reporting Date: 07/06/95  
Project Number: NONE GIVEN  
Project Name: NORTH PLANT  
Project Location: EUNICE  
Lab Number: H2082-4  
Sample ID: ROLL OFF BOX # 2

Analysis Date: 07/05/95  
Sampling Date: 06/28/95  
Sample Type: SOIL  
Sample Condition: INTACT  
Sample Received By: GAP  
Analyzed By: BC

TCLP VOLATILES (ppm)	EPA LIMIT	Detection Limit	Sample Result H2082-4	Method Blank	QC	%IA	True Value QC
Vinyl chloride	0.20	0.001	<0.020	<0.001	116.0	116	100
1,1-Dichloroethylene	0.70	0.001	<0.020	<0.001	109.0	109	100
Methyl ethyl ketone	200.00	0.001	<0.020	<0.001	119.0	119	100
Chloroform	6.00	0.001	<0.020	<0.001	107.0	107	100
1,2-Dichloroethane	0.50	0.001	<0.020	<0.001	100.0	100	100
Benzene	0.50	0.001	<0.020	<0.001	120.0	120	100
Carbon tetrachloride	0.50	0.001	<0.020	<0.001	106.0	106	100
Trichloroethylene	0.50	0.001	<0.020	<0.001	117.0	117	100
Tetrachloroethylene	0.70	0.001	<0.020	<0.001	104.0	104	100
Chlorobenzene	100.00	0.001	<0.020	<0.001	96.8	97	100
1,4-Dichlorobenzene	7.50	0.001	<0.020	<0.001	96.9	97	100

	% Recovery	Relative Percent Difference
Dibromofluoromethane	120	17
Toluene - d8	124	5
Bromofluorobenzene	99	18

METHODS: EPA SW-846-8260, 1311

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AUG 03 1995

UCC HOBBS  
OFFICE

Burgess J. A. Cooke, Ph. D.

7/5/95  
Date

PLEASE NOTE: Liability and Damages. CARDINAL's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by CARDINAL within thirty (30) days after completion of the applicable service. In no event shall CARDINAL be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by CARDINAL, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



DISTRICT I  
PO Box 1989  
Hobbs, NM 88241-1989

DISTRICT II  
PO Drawer 191  
Artesia, NM 88211-0719

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

DISTRICT III  
1000 Rio Arriba Rd.  
Alamogordo, NM 87410

DISTRICT IV  
PO Box 2088  
Santa Fe, NM 87501

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE		XXXXXXXXXXXXXXXXXXXXXXX
1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	4. Generator <i>Eott Energy Corp.</i>	
2. Destination <i>EPI - ENVIRONMENTAL PLUS INC.</i>	5. Name of Originating Site	
3. Address of Facility Operator <i>P.O. Box 969 Eunice, N-mex. 88231</i>	6. Name of Transporter	
7. Location of Material (Street Address or ULSTR) <i>Unit B 20-19-37 Approx 2 mi. North + 1/2 mi. West of monument, n.m.</i>	8. State <i>N. Mex.</i>	
9. <u>Circle One</u> A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-oilfield exempt wastes will be accompanied by a certification of waste status from the Generator and the New Mexico Environment Department or other appropriate government agency; two certificates per job. C. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analyses to prove the material is non-hazardous and the Generator's certification of origin. No waste classified as hazardous by listing or testing will be approved.  All transporters must certify the wastes delivered are only those consigned for transport.		

BRIEF DESCRIPTION OF THE MATERIAL:

*Contaminated soil caused by Pipeline separation.*

*Eott HAS "KNOWLEDGE OF PROCESS"  
OK VERBAL!*

*DISCUSSED WITH GARY WILKINS FROM SENG*

**RECEIVED**

**APR 28 1995**

**UCD HOBBS  
OFFICE**

Estimated Volume 500 to 800 cy Known Volume (to be entered by the operator at the end of the haul): \_\_\_\_\_  
I hereby certify that the information above is true and complete to the best of my knowledge and belief.  
SIGNATURE Charlie Bettis TITLE Pres. DATE 4-28-95  
TYPE OR PRINT NAME Charlie Bettis TELEPHONE NO. 505-394-3481

(This space for State Use)  
APPROVED BY [Signature] TITLE Engr. Frank DATE 4/28/95  
APPROVED BY [Signature] TITLE GEOLOGIST DATE 5-15-95

McNeil Ranch

915-687-2040

EPT 34

DISTRICT I

P.O. Box 1980, Hobbs, NM 88241-1980

DISTRICT II

P.O. Box 1100, Artesia, NM 88211-0719

DISTRICT III

1000 Rio Brazos Rd, Aztec, NM 87410

State of New Mexico

Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

P.O. Box 2088

Santa Fe, New Mexico 87504-2088

SUBMIT 2 COPIES TO  
APPROPRIATE DISTRICT  
OFFICE IN ACCORDANCE  
WITH RULE 116 PRINTED  
ON BACK SIDE OF FORM

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

OPERATOR				ADDRESS				TELEPHONE #			
EOTT											
REPORT OF	FIRE	BREAK	SPILL	LEAK	BLOWOUT	OTHER*					
TYPE OF FACILITY	DRWG WELL	PROD WELL	TANK BTRY	PIPE LINE	GASO PLNT	OIL RFY	OTHER*				
FACILITY NAME: Gathering Line Amerada St Lx											
LOCATION OF FACILITY						SEC.	TWP.	RGE.	COUNTY		
Qtr/Qtr Sec. or Footage						20	19	37			
DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK											
DATE AND HOUR OF OCCURRENCE					DATE AND HOUR OF DISCOVERY						
Unknown					4/24/95 8:45 AM						
WAS IMMEDIATE NOTICE GIVEN?		YES	NO	NOT REQUIRED	IF YES, TO WHOM						
					Bonnie						
BY WHOM		Lennah Frost			DATE AND HOUR		10:15 AM				
TYPE OF FLUID LOST		Oil			QUANTITY OF LOSS		VOLUME RECOVERED				
					102		Lick None				
DID ANY FLUIDS REACH A WATERCOURSE?		YES	NO	QUANTITY							
IF YES, DESCRIBE FULLY**											
approx 2 mi N McCallum Hwy 8 Turn Left - 3/4 mile											
DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN**											
Unknown party cut line - 3 places											
DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN**											
No Cattle Backhoe on way to spill Area - size											
DESCRIPTION OF AREA	FARMING	GRAZING	URBAN	OTHER*							
SURFACE CONDITIONS	SANDY	SANDY LOAM	CLAY	ROCKY	WET	DRY	SNOW				
DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**											
I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF											
SIGNED		PRINTED NAME AND TITLE				DATE					

\*SPECIFY

\*\*ATTACH ADDITIONAL SHEETS IF NECESSARY

# EOTT ENERGY Pipeline Limited Partnership

P.O. BOX 1660  
5805 E. BUSINESS 20  
MIDLAND, TEXAS 79702  
(915) 687-2040

May 4, 1995

State of New Mexico  
Oil Conservation Division  
Hobbs District Office  
P.O. Box 1980  
Hobbs, NM 88241-1980  
Attn: Wayne Price

Dear Wayne:

As per our conversation today regarding the crude oil leak at the Amerada State L&T lease on April 24, 1995, EOTT has completed cleanup of the site. We removed approximately 468 cubic yards of contaminated soil. This soil was disposed of at Enviornmental Plus, Inc. near Eunice. We backfilled with approximately 372 yards of clean soil taken from a site on Mr. Bill McNeal's land.

Aattached is the analysis of soil taken from the bottom of the excavation site. TPH levels were 1200 ppm.

If you have any questions, please don't hesitate to call. Wayne, I want to thank you and Gary for taking time to visit with Mr. McNeal and myself regarding remediation in New Mexico.

Sincerely,

*Lennah Frost*  
Lennah Frost  
Environmental & Safety Coordinator

cc: Al Hugh

RECEIVED

OIL CONSERVATION  
HOBBS  
OFFICE

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT ENERGY PIPELINE  
ATTN: LENNAH FROST  
P.O. BOX 1660  
MIDLAND, TEXAS 79702  
FAX: 915-682-4765

RECEIVING DATE: 05/02/95  
SAMPLE TYPE: SOIL  
PROJECT #: AMERADA STATE L&T  
PROJECT LOCATION: LEA COUNTY NEW MEXICO


ANALYSIS DATE: 05/02/95  
SAMPLING DATE: 05/02/95  
SAMPLE CONDITION: INTACT

ELT #	FIELD CODE	TPH ppm
4025	AMERADA STATE L&T	1200

QUALITY CONTROL  
TRUE VALUE  
% PRECISION

164  
166  
99

Methods: EPA 418.1

  
Roland Tuttle

5/3/95  
Date

DISTRICT I  
180 Box 1000  
Hobbs, NM 88241-1000

DISTRICT II  
100 Drawer 140  
Artesia, NM 88211-0719

562 SF 1/10/95

RECEIVED  
CONSERVATION DIVISION

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

DISTRICT III  
1000 Rio Brazos Rd  
Aztec, NM 87410

DISTRICT IV  
100 Box 3000  
Santa Fe, NM 87508

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE		XXXXXXXXXXXXXXXXXXXXXX
1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> Verbal Approval Received: Yes <input type="checkbox"/> No <input type="checkbox"/>	4. Generator EOTT Energy Corp.	
2. Destination EPI - Environmental Plus, Inc.	5. Name of Originating Site Lea Station State "M" Gathering Line	
3. Address of Facility Operator P.O. Box 969, Eunice, New Mexico 88231, Lea Station	6. Name of Transporter B & H Maintenance & Const.	
7. Location of Material (Street Address or ULSTR) Approximately 5 miles south of Monument, NM Lea Station	8. State New Mexico	
9. <u>Circle One</u>  A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-oilfield exempt wastes will be accompanied by a certification of waste status from the Generator and the New Mexico Environment Department or other appropriate government agency; two certificates per job. C. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analyses to prove the material is non-hazardous and the Generator's certification of origin. No waste classified as hazardous by listing or testing will be approved.  All transporters must certify the wastes delivered are only those consigned for transport.		

BRIEF DESCRIPTION OF THE MATERIAL:

Contaminated soil from station piping and gathering system

RECEIVED

JAN 10 1995

OCC HOBBS  
OFFICE

"KNOWLEDGE OF PROCESS"  
"SEE ATTACHMENT"

Estimated Volume 60 cy Known Volume (to be entered by the operator at the end of the haul): \_\_\_\_\_  
I hereby certify that the information above is true and complete to the best of my knowledge and belief.  
SIGNATURE Charlie Bettis TITLE President DATE 1-9-95  
TYPE OR PRINT NAME Charlie Bettis, President TELEPHONE NO. (505) 394-3481

(This space for State Use)

APPROVED BY [Signature] TITLE ENR ENR DATE 1/10/95  
APPROVED BY [Signature] TITLE GEOLOGIST DATE 1/19/95



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING  
GOVERNOR

December 1, 1994

2040 S. PACHECO  
SANTA FE, NEW MEXICO 87505  
(505) 827-7131

**CERTIFIED MAIL**

**RETURN RECEIPT NO. P-667-242-181**

Ms. Lennah Frost  
Environmental & Safety Coordinator  
EOTT Energy Corp.  
P.O. Box 1660  
Midland, Texas 79702

**RECEIVED**

DEC 06 1994

OCD HOBBS  
OFFICE

**RE: CRUDE OIL TRANSPORTATION AND PIPELINE SPILLS**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Corp.'s (EEC) November 8, 1994 "DISPOSAL OF CRUDE OIL CONTAMINATED SOILS AND PROCESS KNOWLEDGE DATABASE". This document presents the results of representative RCRA hazardous waste characteristic sampling of contaminated soils from transportation related spills of crude oil. EOTT requests that they be allowed to use these analyses and a statement of process knowledge for determining that soils from future transportation spills are RCRA non-hazardous.

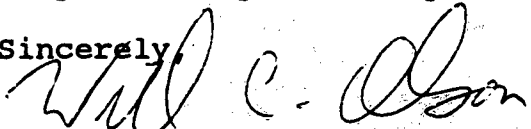
The above referenced request is approved with the following condition:

1. These analyses can be used in lieu of individual hazardous waste characteristic sampling for spill events until January 1, 1996.
2. EOTT will reference the above waste determination in all future RCRA non-exempt crude oil spill reports to the OCD and in disposal requests to OCD permitted commercial disposal facilities.

Please be advised that OCD approval does not relieve EOTT of liability should leaks and spills result in actual contamination of surface waters, ground waters or the environment. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have questions please contact me at (505) 827-7154.

Sincerely,

  
William C. Olson  
Hydrogeologist  
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor  
Wayne Price, OCD Hobbs District Office  
Benito Garcia, NMED Hazardous and Radioactive Waste Bureau

SFUT SF 1/10/95

**DISTRICT I**

PO Box 1980

Hobbs, NM 88401-1980

**DISTRICT II**

PO Drawer 141

Artesia, NM 88211-0719

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

**DISTRICT III**

1000 Rio Arriba Rd

Aztec, NM 87410

**DISTRICT IV**

PO Box 388

Santa Fe, NM 87501

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE		XXXXXXXXXXXXXXXXXXXXXXX
1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> Verbal Approval Received: Yes <input type="checkbox"/> No <input type="checkbox"/>	4. Generator EOTT Energy Corp.	
2. Destination EPI - Environmental Plus Inc.	5. Name of Originating Site Denton Gath. System	
3. Address of Facility Operator P.O. Box 969, Eunice, NM 88231	6. Name of Transporter B & H Maintenance & Const.	
7. Location of Material (Street Address or ULSTR) Approximately 1 1/2 mile <del>W</del> of Denton gas Plant, Lovington, NM	8. State New Mexico	
9. <u>Circle One</u>  A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-oilfield exempt wastes will be accompanied by a certification of waste status from the Generator and the New Mexico Environment Department or other appropriate government agency; two certificates per job. C. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analyses to prove the material is non-hazardous and the Generator's certification of origin. No waste classified as hazardous by listing or testing will be approved.  All transporters must certify the wastes delivered are only those consigned for transport.		

**BRIEF DESCRIPTION OF THE MATERIAL:**

Contaminated soil from pipeline leak.

**RECEIVED**  
JAN 10 1995  
OCD HOBBS  
OFFICE

"KNOWLEDGE OF PROCESS"

"SEE ATTACHED LETTER"

Estimated Volume 6 cy Known Volume (to be entered by the operator at the end of the haul): \_\_\_\_\_  
I hereby certify that the information above is true and complete to the best of my knowledge and belief.  
SIGNATURE Charlie Bettis TITLE President DATE 1-9-95  
TYPE OR PRINT NAME Charlie Bettis, President TELEPHONE NO. (505) 394-3481

(This space for State Use)

APPROVED BY [Signature] TITLE ENR ENGR DATE 1/10/95  
APPROVED BY [Signature] TITLE GEOLOGIST DATE 1/18/95



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

BRUCE KING  
GOVERNOR

December 1, 1994

2040 S. PACHECO  
SANTA FE, NEW MEXICO 87505  
(505) 827-7131

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-667-242-181**

**RECEIVED**

DEC 06 1994

OCD HOBBS  
OFFICE

Ms. Lennah Frost  
Environmental & Safety Coordinator  
EOTT Energy Corp.  
P.O. Box 1660  
Midland, Texas 79702

**RE: CRUDE OIL TRANSPORTATION AND PIPELINE SPILLS**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Corp.'s (EEC) November 8, 1994 "DISPOSAL OF CRUDE OIL CONTAMINATED SOILS AND PROCESS KNOWLEDGE DATABASE". This document presents the results of representative RCRA hazardous waste characteristic sampling of contaminated soils from transportation related spills of crude oil. EOTT requests that they be allowed to use these analyses and a statement of process knowledge for determining that soils from future transportation spills are RCRA non-hazardous.

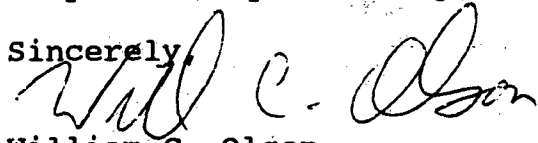
The above referenced request is approved with the following condition:

1. These analyses can be used in lieu of individual hazardous waste characteristic sampling for spill events until January 1, 1996.
2. EOTT will reference the above waste determination in all future RCRA non-exempt crude oil spill reports to the OCD and in disposal requests to OCD permitted commercial disposal facilities.

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If you have questions please contact me at (505) 827-7154.

Sincerely,

  
William C. Olson  
Hydrogeologist  
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor  
Wayne Price, OCD Hobbs District Office  
Benito Garcia, NMED Hazardous and Radioactive Waste Bureau



DISTRICT I  
PO Box 1900  
Hobbs, NM 88241-1900

DISTRICT II  
PO Drawer 191  
Artesia, NM 88211-0719

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

DISTRICT III  
1000 Rio Arriba Rd.  
Alamogordo, NM 88410

DISTRICT IV  
PO Box 3888  
Santa Fe, NM 87508

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE		XXXXXXXXXXXXXXXXXXXXXXX
1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> Verbal Approval Received: Yes <input type="checkbox"/> No <input type="checkbox"/>	4. Generator EOTT Energy Pipeline	
2. Destination Environmental Plus, Inc.	5. Name of Originating Site Chevron Eubanks Lease	
3. Address of Facility Operator P.O. Box 969 Eunice, NM 88231	6. Name of Transporter Bettis Construction, Inc.	
7. Location of Material (Street Address or ULSTR) Approximately 500' West of Shell Western E & P Inc. N.E. Drinkard unit well #808 Sec 22 T.215-R37E	8. State New Mexico	
9. <u>Circle One</u>  A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-oilfield exempt wastes will be accompanied by a certification of waste status from the Generator and the New Mexico Environment Department or other appropriate government agency; two certificates per job. <input checked="" type="radio"/> C. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analyses to prove the material is non-hazardous and the Generator's certification of origin. No waste classified as hazardous by listing or testing will be approved.  All transporters must certify the wastes delivered are only those consigned for transport.		

BRIEF DESCRIPTION OF THE MATERIAL:

Material that has accumulated around a transfer pump over the years.

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DEC 14 1994

OCD HOBBS  
OFFICE

KNOWLEDGE of PROCESS ATTACHED

Estimated Volume 30 to 40 cy Known Volume (to be entered by the operator at the end of the haul): \_\_\_\_\_  
I hereby certify that the information above is true and complete to the best of my knowledge and belief.  
SIGNATURE Charlie Bettis TITLE Vice President DATE 12-12-94  
TYPE OR PRINT NAME Charlie Bettis TELEPHONE NO. (505) 394-3481

(This space for State Use)

APPROVED BY Wanda Price TITLE ENR ENGR DATE 12/15/94  
APPROVED BY W. S. Sinton TITLE GEOLOGIST DATE 12/23/94

copy



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

BRUCE KING  
GOVERNOR

December 1, 1994

2040 S. PACHECO  
SANTA FE, NEW MEXICO 87505  
(505) 827-7131

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-667-242-181**

Ms. Lennah Frost  
Environmental & Safety Coordinator  
EOTT Energy Corp.  
P.O. Box 1660  
Midland, Texas 79702

**RECEIVED**

DEC 06 1994

OCD HOBBS  
OFFICE

**RE: CRUDE OIL TRANSPORTATION AND PIPELINE SPILLS**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Corp.'s (EEC) November 8, 1994 "DISPOSAL OF CRUDE OIL CONTAMINATED SOILS AND PROCESS KNOWLEDGE DATABASE". This document presents the results of representative RCRA hazardous waste characteristic sampling of contaminated soils from transportation related spills of crude oil. EOTT requests that they be allowed to use these analyses and a statement of process knowledge for determining that soils from future transportation spills are RCRA non-hazardous.

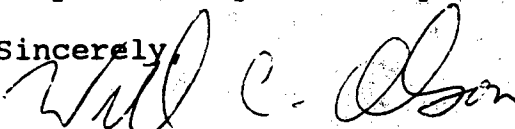
The above referenced request is approved with the following condition:

1. These analyses can be used in lieu of individual hazardous waste characteristic sampling for spill events until January 1, 1996.
2. EOTT will reference the above waste determination in all future RCRA non-exempt crude oil spill reports to the OCD and in disposal requests to OCD permitted commercial disposal facilities.

Please be advised that OCD approval does not relieve EOTT of liability should leaks and spills result in actual contamination of surface waters, ground waters or the environment. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have questions please contact me at (505) 827-7154.

Sincerely,

  
William C. Olson  
Hydrogeologist  
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor  
Wayne Price, OCD Hobbs District Office  
Benito Garcia, NMED Hazardous and Radioactive Waste Bureau

copy

# EOTT ENERGY Operating Limited Partnership

P.O. BOX 1660  
5805 E. BUSINESS 20  
MIDLAND, TEXAS 79702  
(915) 682-8251

November 8, 1994

State of New Mexico  
Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, NM 87505  
Attn: Roger Anderson

52  
**RECEIVED**

DEC 06 1994

OCD HOBBS  
OFFICE

RE: Disposal of Crude Oil Contaminated Soils and Process Knowledge Database

Dear Mr. Anderson:

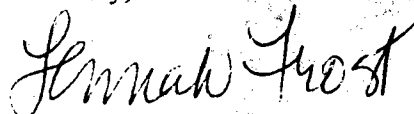
Attached please find analytical results of contaminated soil samples taken on 9/23/94 from five leak sites in New Mexico. We believe these to be representative of the crude oil being transported throughout our system. I have attached a map of our New Mexico system, placing the following numbers at their respective sites to correlate with the lab results: 1) Anderson Ranch Gathering System, 2) Denton Gathering System, 3) Livingston Ridge Station, 4) State "M", and 5) Justis Gathering System.

As you will see the samples are non-hazardous (nonignitable, nonreactive, noncorrosive), benzene levels as part of the BTEX are non-detectable, volatiles and semi-volatiles are at non-detectable levels, and metals are below the EPA limits. Based on this information, we are requesting approval to dispose of these contaminated soils at Environmental Plus, Inc. landfarm at Eunice, New Mexico.

At this time we are also requesting that the OCD accept these analyses as our process knowledge of the products carried in both our pipelines and transport trucks. We would like to be able to use this as our analytical database for future releases and spills.

Your prompt attention to this matter is greatly appreciated. We would like to be able to dispose of the contaminated soils before the end of the year. If you have any questions or need further information please don't hesitate to call.

Sincerely,



Lennah Frost  
Environmental & Safety Coordinator

attachments

6" 4" BEDFORD

8"

WHEELER

BEDFORD-WHEELER 8"  
ANDREWS & WINKLER CO.  
TEXAS

ANDERSON  
RANCH ①

8"

DENTON

②

8"

34 JUNCTION

10"

PEARL QUEEN

4"

LEA STATION

6"

8"

NEW MCKEE JCT

OLD MCKEE JCT

8"

8"

810X  
(25M)

351  
15M

HUGH INJECTION

811  
5M

10" STARTS HERE

LAMUNYON INJ.

LILLIE INJ.

10"

JAL

JUSTIS INJECTION

⑤

396  
67M

DUBLIN

NEW MEXICO  
TEXAS

8"

10"

TANK 260 (80M)

HENDRICK

CHEVRON WINK

LYNCH STATION

10"

17 mi

6"

17 mi

LIVINGSTON RIDGE STA

20M

6"

POKER LAKE STATION

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O.C.D. HOBBS  
OFFICE

Counties

New Mexico - Eddy and Lea

Texas - Andrews and Winkler

EOTT ENERGY MIDLAND AREA PIPELINES  
APRIL 11, 1994

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

October 12, 1994

EOTT Energy Corp.  
Ms. Lennah Frost  
P.O. Box 1660  
Midland, Texas 79702

Sample Matrix: Soil

Project: TCLP Soil Testing  
Requested By: Lennah Frost

Date Received: 9/23/94  
Date Analyzed: 9/26/94

## CHEMICAL ANALYSIS REPORT

Parameter	Value	Units	EPA SW-846 Test Method
Sample ID: Justis G.S. Spill			418.1/3550
Total Petroleum Hydrocarbons	64,837	ppm	
Sample ID: Anderson Ranch G.S.			
Total Petroleum Hydrocarbons	68,552	ppm	
Sample ID: Denton G.S.			
Total Petroleum Hydrocarbons	47,362	ppm	
Sample ID: State "M"			
Total Petroleum Hydrocarbons	9,991	ppm	
Sample ID: Livingston Ridge Station			
Total Petroleum Hydrocarbons	46,080	ppm	

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OCD HOBBS  
OFFICE

QC (Quality Control)  
Total Petroleum Hydrocarbons QC: 200 ppm  
Detection Limit 10 ppm

	Result	% IA
TPH	207ppm	103

  
Kirk Robinson

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Sample Matrix: Soil

Project: TCLP Soil Testing  
Requested By: Lennah Frost

O C D HOBBS  
OFFICE

Date Received: 9/23/94

Date Analyzed: 9/26/94

Compounds	Actual (ppm)	Detection Limit (ppm)	OC	%IA
<b>Sample ID: Justis G.S. Spill</b>				
Benzene	ND	0.1	0.092	92
Toluene	ND	0.1	0.103	103
Ethylbenzene	ND	0.1	0.106	106
Xylene (m,p)	16.5	0.2	0.209	106
Xylene (o)	8.98	0.1	0.107	107
<u>Surrogate Spike</u>	<u>%Recovery</u>			
a,a,a Trifluorotoluene	97			

<b>Sample ID: Anderson Ranch G.S.</b>				
Benzene	ND	0.1	0.092	92
Toluene	ND	0.1	0.103	103
Ethylbenzene	11.3	0.1	0.106	106
Xylene (m,p)	23.9	0.2	0.209	106
Xylene (o)	9.9	0.1	0.107	107
<u>Surrogate Spike</u>	<u>%Recovery</u>			
a,a,a Trifluorotoluene	100			

<b>Sample ID: Denton G.S.</b>				
Benzene	ND	0.1	0.092	92
Toluene	ND	0.1	0.103	103
Ethylbenzene	ND	0.1	0.106	106
Xylene (m,p)	ND	0.2	0.209	106
Xylene (o)	ND	0.1	0.107	107
<u>Surrogate Spike</u>	<u>%Recovery</u>			
a,a,a Trifluorotoluene	106			

page 2 TCLP Soil Testing Cont.

Compounds	Actual (ppm)	Detection Limit (ppm)	OC	%IA
Sample ID: State "M"				
Benzene	ND	0.1	0.092	92
Toluene	ND	0.1	0.103	103
Ethylbenzene	ND	0.1	0.106	106
Xylene (m,p)	ND	0.2	0.209	106
Xylene (o)	ND	0.1	0.107	107
Surrogate Spike	%Recovery			
a,a,a Trifluorotoluene	108			

Sample ID: Livingston Ridge Station				
Benzene	ND	0.1	0.092	92
Toluene	ND	0.1	0.103	103
Ethylbenzene	ND	0.1	0.106	106
Xylene (m,p)	25.9	0.2	0.209	106
Xylene (o)	ND	0.1	0.107	107
Surrogate Spike	%Recovery			
a,a,a Trifluorotoluene	106			

QC= 100 ppb BTE (o)X & 200 ppb (m,p) X. Surrogate Spike=100 ppb a,a,a Trifluorotoluene  
Methods: EPA SW 846-8020/5030

ND = Not Detected

  
Kirk Robinson

**RECEIVED**

DEC 06 1994

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OFFICE

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

October 12, 1994

EOTT Energy Corp.  
Ms. Lennah Frost  
P.O. Box 1660  
Midland, Texas 79702

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DEC 9 6 1994

Sample Matrix: Soil

OCD HOBBS  
OFFICE

Project: TCLP Soil Testing  
Requested By: Lennah Frost

Date Received: 9/23/94  
Extraction Date: 9/28/94  
Date Analyzed: 10/8/94

## CHEMICAL ANALYSIS REPORT

Parameter	EPA Limit	Det. Limit	Actual	OC	%IA
Sample ID: Anderson Ranch G.S. TCLP Volatiles (ppm)					
Vinyl Chloride	0.20	0.1	ND	0.062	124
1,1-Dichloroethene	0.70	0.1	ND	0.071	142
Methyl Ethyl Ketone	200	1.0	ND	0.072	144
Chloroform	6.00	1.0	ND	0.053	106
1,2-Dichloroethane	0.50	0.1	ND	0.056	112
Benzene	0.50	0.1	ND	0.042	84
Carbon Tetrachloride	0.50	1.0	ND	0.034	68
Trichloroethane	0.50	0.1	ND	0.045	90
Tetrachloroethane	0.70	0.1	ND	0.049	98
Chlorobenzene	100	0.1	ND	0.051	102
1,4-Dichlorobenzene	7.50	0.1	ND	0.050	100

Surrogates	%Recovery
1,2-Dichloroethane	114
Toluene -d8	93
4-Bromofluorobenzene	98

QC= .05, Spike=.05, Surr. Spike=.05  
Methods: EPA SW 846-8240/1311

ND = Not Detected

  
Kirk Robinson



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"Don't Treat Your Soil Like Dirt!"

October 12, 1994

EOTT Energy Corp.  
Ms. Lennah Frost  
P.O. Box 1660  
Midland, Texas 79702

**RECEIVED**

Sample Matrix: Soil

Project: TCLP Soil Testing  
Requested By: Lennah Frost

O C D HOBBS  
OFFICE

Date Received: 9/23/94  
Extraction Date: 9/28/94  
Date Analyzed: 9/29/94

## CHEMICAL ANALYSIS REPORT

Parameter	EPA Limit	Det. Limit	Actual	OC	%IA
Sample ID: Anderson Ranch G.S. TCLP Semi Volatiles (ppm)					
Pyridine	5.0	0.001	ND	0.440	88
1,4-Dichlorobenzene	7.5	0.001	ND	0.467	93
o-Cresol	200	0.001	ND	0.475	95
m,p-Cresol	200	0.001	ND	0.917	92
Total Cresol	200	0.001	ND	1.392	93
Hexachloroethane	3.0	0.001	ND	0.453	91
Nitrobenzene	2.0	0.001	ND	0.426	85
Hexachlorobutadiene	0.5	0.001	ND	0.473	95
2,4,6-Trichlorophenol	2.0	0.001	ND	0.319	64
2,4,5-Trichlorophenol	400	0.001	ND	0.408	82
2,4-Dinitrotoluene	0.13	0.001	ND	0.426	85
2,4 D	10.0	0.01	ND	0.419	84
Hexachlorobenzene	0.13	0.001	ND	0.510	102
2,4,5-TP	1.0	0.01	ND	0.576	115
Pentachlorophenol	100	0.001	ND	0.476	95
Lindane	0.4	0.001	ND	0.427	85
Total Heptachlor	0.008	0.001	ND	1.005	101
Endrin	0.02	0.001	ND	0.483	97
Methoxychlor	10.0	0.001	ND	0.508	102
Chlordane	0.03	0.0002	ND	0.0022	110
Toxaphene	0.5	0.005	ND	0.0237	119

### % Recovery

2-Fluorophenol SURR	99
Phenol-d5 SURR	132
Nitrobenzene-d5	131
2-Fluorobiphenyl SURR	97
2,4,6-Tribromophenol SURR	97
Terphenyl-d14 SURR	90

Methods: EPA SW 846-8270/1311

  
Kirk Robinson

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"Don't Treat Your Soil Like Dirt!"

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DEC 06 1994

OCD HOBBS  
OFFICE

October 12, 1994

EOTT Energy Corp.  
Ms. Lennah Frost  
P.O. Box 1660  
Midland, Texas 79702

Sample Matrix: Soil

Project: TCLP Soil Testing  
Requested By: Lennah Frost

Date Received: 9/23/94

Date Analyzed: 9/30/94

## CHEMICAL ANALYSIS REPORT

Parameter	Value (ppm)	EPA Limit (ppm)	QC	% Accuracy	Detection Limit
Sample ID: Anderson Ranch G.S.					
Arsenic (As)	<1.0	5.0	2.3	115	1.0
Selenium (Se)	<1.0	1.0	2.1	105	1.0
Chromium (Cr)	<1.0	5.0	1.98	99	1.0
Cadmium (Cd)	<1.0	1.0	2.0	100	1.0
Lead (Pb)	<1.0	5.0	2.0	100	1.0
Barium (Ba)	<10	100	100	100	10
Mercury (Hg)	<0.2	0.20	0.2	100	0.2
Silver (Ag)	<1.0	5.0	2.0	100	1.0

Methods: EPA SW 846-1311, 7061, 7080, 7130, 7420, 7190, 7471, 7741, 7760.

TCLP Metals QC: 2.0 ppm Cd, Cr, Pb and Ag; 2.0 ppm Se and As; 100 ppm Ba; and 0.20 ppm Hg.

  
Kirk Robinson

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"Don't Treat Your Soil Like Dirt!"

October 12, 1994

EOTT Energy Corp.  
Ms. Lennah Frost  
P.O. Box 1660  
Midland, Texas 79702

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OCD HOBBS  
OFFICE

Sample Matrix: Soil

Project: TCLP Soil Testing  
Requested By: Lennah Frost

Date Received: 9/23/94

Date Analyzed: 9/26/94

---

## CHEMICAL ANALYSIS REPORT

Parameter	Value	Units
Sample ID: Anderson Ranch G.S.		
Ignitability	Nonignitable	
Reactivity		
Sulfides (ppm)	<25.0	Nonreactive
Cyanides (ppm)	<2.5	
Corrosivity pH	7.62	Noncorrosive
Methods: EPA SW 846-2.1.1, 2.1.2, 2.1.3		

---

  
Kirk Robinson

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OFFICE

October 12, 1994

EOTT Energy Corp.  
Ms. Lennah Frost  
P.O. Box 1660  
Midland, Texas 79702

Sample Matrix: Soil

Project: TCLP Soil Testing  
Requested By: Lennah Frost

Date Received: 9/23/94  
Extraction Date: 9/28/94  
Date Analyzed: 10/8/94

## CHEMICAL ANALYSIS REPORT

Parameter	EPA Limit	Det. Limit	Actual	QC	%IA
Sample ID: Denton G.S. TCLP Volatiles (ppm)					
Vinyl Chloride	0.20	0.1	ND	0.062	124
1,1-Dichloroethene	0.70	0.1	ND	0.071	142
Methyl Ethyl Ketone	200	1.0	ND	0.072	144
Chloroform	6.00	1.0	ND	0.053	106
1,2-Dichloroethane	0.50	0.1	ND	0.056	112
Benzene	0.50	0.1	ND	0.042	84
Carbon Tetrachloride	0.50	1.0	ND	0.034	68
Trichloroethane	0.50	0.1	ND	0.045	90
Tetrachloroethane	0.70	0.1	ND	0.049	98
Chlorobenzene	100	0.1	ND	0.051	102
1,4-Dichlorobenzene	7.50	0.1	ND	0.050	100

Surrogates	%Recovery
1,2-Dichloroethane	92
Toluene -d8	103
4-Bromofluorobenzene	96

QC= .05, Spike=.05, Surr. Spike=.05

Methods: EPA SW 846-8240/1311

ND = Not Detected

  
Kirk Robinson

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Sample Matrix: Soil

Project: TCLP Soil Testing  
Requested By: Lennah Frost

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Date Analyzed: 9/29/94

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Parameter	EPA Limit	Det. Limit	Actual	OC	%IA
Sample ID: Denton G.S. TCLP Semi Volatiles (ppm)					
Pyridine	5.0	0.001	ND	0.440	88
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o-Cresol	200	0.001	ND	0.475	95
m,p-Cresol	200	0.001	ND	0.917	92
Total Cresol	200	0.001	ND	1.392	93
Hexachloroethane	3.0	0.001	ND	0.453	91
Nitrobenzene	2.0	0.001	ND	0.426	85
Hexachlorobutadiene	0.5	0.001	ND	0.473	95
2,4,6-Trichlorophenol	2.0	0.001	ND	0.319	64
2,4,5-Trichlorophenol	400	0.001	ND	0.408	82
2,4-Dinitrotoluene	0.13	0.001	ND	0.426	85
2,4 D	10.0	0.01	ND	0.419	84
Hexachlorobenzene	0.13	0.001	ND	0.510	102
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Total Heptachlor	0.008	0.001	ND	1.005	101
Endrin	0.02	0.001	ND	0.483	97
Methoxychlor	10.0	0.001	ND	0.508	102
Chlordane	0.03	0.0002	ND	0.0022	110
Toxaphene	0.5	0.005	ND	0.0237	119
% Recovery					
2-Fluorophenol SURR	81				
Phenol-d5 SURR	103				
Nitrobenzene-d5	103				
2-Fluorobiphenyl SURR	90				
2,4,6-Tribromophenol SURR	96				
Terphenyl-d14 SURR	85				

Methods: EPA SW 846-8270/1311

  
Kirk Robinson

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OCD HOBBS

October 12, 1994 OFFICE

EOTT Energy Corp.  
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Midland, Texas 79702

Sample Matrix: Soil

Project: TCLP Soil Testing  
Requested By: Lennah Frost

Date Received: 9/23/94  
Date Analyzed: 9/30/94

## CHEMICAL ANALYSIS REPORT

Parameter	Value (ppm)	EPA Limit (ppm)	QC	% Accuracy	Detection Limit
Sample ID: Denton G.S.					
Arsenic (As)	<1.0	5.0	2.3	115	1.0
Selenium (Se)	<1.0	1.0	2.1	105	1.0
Chromium (Cr)	<1.0	5.0	1.98	99	1.0
Cadmium (Cd)	<1.0	1.0	2.0	100	1.0
Lead (Pb)	<1.0	5.0	2.0	100	1.0
Barium (Ba)	<10	100	100	100	10
Mercury (Hg)	<0.2	0.20	0.2	100	0.2
Silver (Ag)	<1.0	5.0	2.0	100	1.0

Methods: EPA SW 846-1311, 7061, 7080, 7130, 7420, 7190, 7471, 7741, 7760.

TCLP Metals QC: 2.0 ppm Cd, Cr, Pb and Ag; 2.0 ppm Se and As; 100 ppm Ba; and 0.20 ppm Hg.

  
Kirk Robinson

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OCT 06 1994

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Ms. Lennah Frost  
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Sample Matrix: Soil

Project: TCLP Soil Testing  
Requested By: Lennah Frost

Date Received: 9/23/94

Date Analyzed: 9/26/94

---

## CHEMICAL ANALYSIS REPORT

Parameter	Value	Units
Sample ID: Denton G.S.		
Ignitability	Nonignitable	
Reactivity		
Sulfides (ppm)	<25.0	Nonreactive
Cyanides (ppm)	<2.5	
Corrosivity pH	7.83	Noncorrosive
Methods: EPA SW 846-2.1.1, 2.1.2, 2.1.3		

---

  
Kirk Robinson

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Sample Matrix: Soil

Project: TCLP Soil Testing  
Requested By: Lennah Frost

Date Received: 9/23/94  
Extraction Date: 9/28/94  
Date Analyzed: 10/8/94

## CHEMICAL ANALYSIS REPORT

Parameter	EPA Limit	Det. Limit	Actual	QC	%IA
Sample ID: Livingston Ridge Station					
TCLP Volatiles (ppm)					
Vinyl Chloride	0.20	0.1	ND	0.062	124
1,1-Dichloroethene	0.70	0.1	ND	0.071	142
Methyl Ethyl Ketone	200	1.0	ND	0.072	144
Chloroform	6.00	1.0	ND	0.053	106
1,2-Dichloroethane	0.50	0.1	ND	0.056	112
Benzene	0.50	0.1	ND	0.042	84
Carbon Tetrachloride	0.50	1.0	ND	0.034	68
Trichloroethane	0.50	0.1	ND	0.045	90
Tetrachloroethane	0.70	0.1	ND	0.049	98
Chlorobenzene	100	0.1	ND	0.051	102
1,4-Dichlorobenzene	7.50	0.1	ND	0.050	100

Surrogates	%Recovery
1,2-Dichloroethane	107
Toluene -d8	102
4-Bromofluorobenzene	95

QC= .05, Spike=.05, Surr. Spike=.05  
Methods: EPA SW 846-8240/1311

ND = Not Detected

  
Kirk Robinson



# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT Energy Corp.  
Ms. Lennah Frost  
P.O. Box 1660  
Midland, Texas 79702

Sample Matrix: Soil

Project: TCLP Soil Testing  
Requested By: Lennah Frost

October 12, 1994

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OCD HOBBS  
OFFICE

Date Received: 9/23/94  
Extraction Date: 9/28/94  
Date Analyzed: 9/29/94

## CHEMICAL ANALYSIS REPORT

Parameter	EPA Limit	Det. Limit	Actual	OC	%IA
Sample ID: Livingston Ridge Station					
TCLP Semi Volatiles (ppm)					
Pyridine	5.0	0.001	ND	0.440	88
1,4-Dichlorobenzene	7.5	0.001	ND	0.467	93
o-Cresol	200	0.001	ND	0.475	95
m,p-Cresol	200	0.001	ND	0.917	92
Total Cresol	200	0.001	ND	1.392	93
Hexachloroethane	3.0	0.001	ND	0.453	91
Nitrobenzene	2.0	0.001	ND	0.426	85
Hexachlorobutadiene	0.5	0.001	ND	0.473	95
2,4,6-Trichlorophenol	2.0	0.001	ND	0.319	64
2,4,5-Trichlorophenol	400	0.001	ND	0.408	82
2,4-Dinitrotoluene	0.13	0.001	ND	0.426	85
2,4 D	10.0	0.01	ND	0.419	84
Hexachlorobenzene	0.13	0.001	ND	0.510	102
2,4,5-TP	1.0	0.01	ND	0.576	115
Pentachlorophenol	100	0.001	ND	0.476	95
Lindane	0.4	0.001	ND	0.427	85
Total Heptachlor	0.008	0.001	ND	1.005	101
Endrin	0.02	0.001	ND	0.483	97
Methoxychlor	10.0	0.001	ND	0.508	102
Chlordane	0.03	0.0002	ND	0.0022	110
Toxaphene	0.5	0.005	ND	0.0237	119

### % Recovery

2-Fluorophenol SURR	91
Phenol-d5 SURR	107
Nitrobenzene-d5	99
2-Fluorobiphenyl SURR	87
2,4,6-Tribromophenol SURR	94
Terphenyl-d14 SURR	79

Methods: EPA SW 846-8270/1311

  
Kirk Robinson

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"Don't Treat Your Soil Like Dirt!"

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OFFICE

October 12, 1994

EOTT Energy Corp.  
Ms. Lennah Frost  
P.O. Box 1660  
Midland, Texas 79702

Sample Matrix: Soil

Project: TCLP Soil Testing  
Requested By: Lennah Frost

Date Received: 9/23/94  
Date Analyzed: 9/30/94

## CHEMICAL ANALYSIS REPORT

Parameter	Value (ppm)	EPA Limit (ppm)	QC	% Accuracy	Detection Limit
Sample ID: Livingston Ridge Station					
Arsenic (As)	<1.0	5.0	2.3	115	1.0
Selenium (Se)	<1.0	1.0	2.1	105	1.0
Chromium (Cr)	<1.0	5.0	1.98	99	1.0
Cadmium (Cd)	<1.0	1.0	2.0	100	1.0
Lead (Pb)	<1.0	5.0	2.0	100	1.0
Barium (Ba)	<10	100	100	100	10
Mercury (Hg)	<0.2	0.20	0.2	100	0.2
Silver (Ag)	<1.0	5.0	2.0	100	1.0

Methods: EPA SW 846-1311, 7061, 7080, 7130, 7420, 7190, 7471, 7741, 7760.

TCLP Metals QC: 2.0 ppm Cd, Cr, Pb and Ag; 2.0 ppm Se and As; 100 ppm Ba; and 0.20 ppm Hg.

  
Kirk Robinson

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"Don't Treat Your Soil Like Dirt!"

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OCD HOBBS  
OFFICE

October 12, 1994

EOTT Energy Corp.  
Ms. Lennah Frost  
P.O. Box 1660  
Midland, Texas 79702

Sample Matrix: Soil

Project: TCLP Soil Testing  
Requested By: Lennah Frost

Date Received: 9/23/94  
Date Analyzed: 9/26/94

## CHEMICAL ANALYSIS REPORT

Parameter	Value	Units
Sample ID: Livingston Ridge Station		
Ignitability	Nonignitable	
Reactivity		
Sulfides (ppm)	<25.0	Nonreactive
Cyanides (ppm)	<2.5	
Corrosivity pH	7.38	Noncorrosive
Methods: EPA SW 846-2.1.1, 2.1.2, 2.1.3		

  
Kirk Robinson

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

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OCD HOBBS  
OFFICE

October 12, 1994

EOTT Energy Corp.  
Ms. Lennah Frost  
P.O. Box 1660  
Midland, Texas 79702

Sample Matrix: Soil

Project: TCLP Soil Testing  
Requested By: Lennah Frost

Date Received: 9/23/94  
Extraction Date: 9/28/94  
Date Analyzed: 10/8/94

## CHEMICAL ANALYSIS REPORT

Parameter	EPA Limit	Det. Limit	Actual	QC	%IA
Sample ID: State "M"					
TCLP Volatiles (ppm)					
Vinyl Chloride	0.20	0.1	ND	0.062	124
1,1-Dichloroethene	0.70	0.1	ND	0.071	142
Methyl Ethyl Ketone	200	1.0	ND	0.072	144
Chloroform	6.00	1.0	ND	0.053	106
1,2-Dichloroethane	0.50	0.1	ND	0.056	112
Benzene	0.50	0.1	ND	0.042	84
Carbon Tetrachloride	0.50	1.0	ND	0.034	68
Trichloroethane	0.50	0.1	ND	0.045	90
Tetrachloroethane	0.70	0.1	ND	0.049	98
Chlorobenzene	100	0.1	ND	0.051	102
1,4-Dichlorobenzene	7.50	0.1	ND	0.050	100

Surrogates	%Recovery
1,2-Dichloroethane	112
Toluene -d8	100
4-Bromofluorobenzene	96

QC= .05, Spike=.05, Surr. Spike=.05

Methods: EPA SW 846-8240/1311

ND = Not Detected

  
Kirk Robinson

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT Energy Corp.  
Ms. Lennah Frost  
P.O. Box 1660  
Midland, Texas 79702

Sample Matrix: Soil

Project: TCLP Soil Testing  
Requested By: Lennah Frost

October 12, 1994

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Date Received: 9/23/94  
Extraction Date: 9/28/94  
Date Analyzed: 9/29/94

## CHEMICAL ANALYSIS REPORT

Parameter	EPA Limit	Det. Limit	Actual	QC	%IA
Sample ID: State "M"					
TCLP Semi Volatiles (ppm)					
Pyridine	5.0	0.001	ND	0.440	88
1,4-Dichlorobenzene	7.5	0.001	ND	0.467	93
o-Cresol	200	0.001	ND	0.475	95
m,p-Cresol	200	0.001	ND	0.917	92
Total Cresol	200	0.001	ND	1.392	93
Hexachloroethane	3.0	0.001	ND	0.453	91
Nitrobenzene	2.0	0.001	ND	0.426	85
Hexachlorobutadiene	0.5	0.001	ND	0.473	95
2,4,6-Trichlorophenol	2.0	0.001	ND	0.319	64
2,4,5-Trichlorophenol	400	0.001	ND	0.408	82
2,4-Dinitrotoluene	0.13	0.001	ND	0.426	85
2,4 D	10.0	0.01	ND	0.419	84
Hexachlorobenzene	0.13	0.001	ND	0.510	102
2,4,5-TP	1.0	0.01	ND	0.576	115
Pentachlorophenol	100	0.001	ND	0.476	95
Lindane	0.4	0.001	ND	0.427	85
Total Heptachlor	0.008	0.001	ND	1.005	101
Endrin	0.02	0.001	ND	0.483	97
Methoxychlor	10.0	0.001	ND	0.508	102
Chlordane	0.03	0.0002	ND	0.0022	110
Toxaphene	0.5	0.005	ND	0.0237	119
% Recovery					
2-Fluorophenol SURR	83				
Phenol-d5 SURR	113				
Nitrobenzene-d5	103				
2-Fluorobiphenyl SURR	93				
2,4,6-Tribromophenol SURR	101				
Terphenyl-d14 SURR	88				
Methods: EPA SW 846-8270/1311					

  
Kirk Robinson

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

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OCD HOBBS  
OFFICE

October 12, 1994

EOTT Energy Corp.  
Ms. Lennah Frost  
P.O. Box 1660  
Midland, Texas 79702

Sample Matrix: Soil

Project: TCLP Soil Testing  
Requested By: Lennah Frost

Date Received: 9/23/94

Date Analyzed: 9/30/94

## CHEMICAL ANALYSIS REPORT

Parameter	Value (ppm)	EPA Limit (ppm)	QC	% Accuracy	Detection Limit
Sample ID: State "M"					
Arsenic (As)	<1.0	5.0	2.3	115	1.0
Selenium (Se)	<1.0	1.0	2.1	105	1.0
Chromium (Cr)	<1.0	5.0	1.98	99	1.0
Cadmium (Cd)	<1.0	1.0	2.0	100	1.0
Lead (Pb)	<1.0	5.0	2.0	100	1.0
Barium (Ba)	<10	100	100	100	10
Mercury (Hg)	<0.2	0.20	0.2	100	0.2
Silver (Ag)	<1.0	5.0	2.0	100	1.0

Methods: EPA SW 846-1311, 7061, 7080, 7130, 7420, 7190, 7471, 7741, 7760.

TCLP Metals QC: 2.0 ppm Cd, Cr, Pb and Ag; 2.0 ppm Se and As; 100 ppm Ba; and 0.20 ppm Hg.

  
Kirk Robinson

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

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OCD HOBBS  
OFFICE

October 12, 1994

EOTT Energy Corp.  
Ms. Lennah Frost  
P.O. Box 1660  
Midland, Texas 79702

Sample Matrix: Soil

Project: TCLP Soil Testing  
Requested By: Lennah Frost

Date Received: 9/23/94

Date Analyzed: 9/26/94

## CHEMICAL ANALYSIS REPORT

Parameter	Value	Units
Sample ID: State "M"		
Ignitability	Nonignitable	
Reactivity		
Sulfides (ppm)	<25.0	Nonreactive
Cyanides (ppm)	<2.5	
Corrosivity pH	7.42	Noncorrosive
Methods: EPA SW 846-2.1.1, 2.1.2, 2.1.3		

  
Kirk Robinson

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OCD HOBBS  
OFFICE

October 12, 1994

EOTT Energy Corp.  
Ms. Lennah Frost  
P.O. Box 1660  
Midland, Texas 79702

Sample Matrix: Soil

Project: TCLP Soil Testing  
Requested By: Lennah Frost

Date Received: 9/23/94

Extraction Date: 9/28/94

Date Analyzed: 10/8/94

## CHEMICAL ANALYSIS REPORT

Parameter	EPA Limit	Det. Limit	Actual	QC	%IA
Sample ID: Justis G.S. Spill					
TCLP Volatiles (ppm)					
Vinyl Chloride	0.20	0.1	ND	0.062	124
1,1-Dichloroethene	0.70	0.1	ND	0.071	142
Methyl Ethyl Ketone	200	1.0	ND	0.072	144
Chloroform	6.00	1.0	ND	0.053	106
1,2-Dichloroethane	0.50	0.1	ND	0.056	112
Benzene	0.50	0.1	ND	0.042	84
Carbon Tetrachloride	0.50	1.0	ND	0.034	68
Trichloroethane	0.50	0.1	ND	0.045	90
Tetrachloroethane	0.70	0.1	ND	0.049	98
Chlorobenzene	100	0.1	ND	0.051	102
1,4-Dichlorobenzene	750	0.1	ND	0.050	100

Surrogates	%Recovery
1,2-Dichloroethane	81
Toluene-d8	100
4-Bromofluorobenzene	98

QC = .05, Spike = .05, Surr. Spike = .05

Methods: EPA SW-846-8240/1311

ND = Not Detected

  
Kirk Robinson



# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

October 12, 1994

EOTT Energy Corp.  
Ms. Lennah Frost  
P.O. Box 1660  
Midland, Texas 79702

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Sample Matrix: Soil

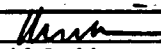
Project: TCLP Soil Testing  
Requested By: Lennah Frost

OCD HOBBS  
OFFICE

Date Received: 9/23/94  
Extraction Date: 9/28/94  
Date Analyzed: 9/29/94

## CHEMICAL ANALYSIS REPORT

Parameter	EPA Limit	Det. Limit	Actual	OC	%IA
Sample ID: Justis G.S. Spill					
TCLP Semi Volatiles (ppm)					
Pyridine	5.0	0.001	ND	0.440	88
1,4-Dichlorobenzene	7.5	0.001	ND	0.467	93
o-Cresol	200	0.001	ND	0.475	95
m,p-Cresol	200	0.001	ND	0.917	92
Total Cresol	200	0.001	ND	1.392	93
Hexachloroethane	3.0	0.001	ND	0.453	91
Nitrobenzene	2.0	0.001	ND	0.426	85
Hexachlorobutadiene	0.5	0.001	ND	0.473	95
2,4,6-Trichlorophenol	2.0	0.001	ND	0.319	64
2,4,5-Trichlorophenol	400	0.001	ND	0.408	82
2,4-Dinitrotoluene	0.13	0.001	ND	0.426	85
2,4 D	10.0	0.01	ND	0.419	84
Hexachlorobenzene	0.13	0.001	ND	0.510	102
2,4,5-TP	1.0	0.01	ND	0.576	115
Pentachlorophenol	100	0.001	ND	0.476	95
Lindane	0.4	0.001	ND	0.427	85
Total Heptachlor	0.008	0.001	ND	1.005	101
Endrin	0.02	0.001	ND	0.483	97
Methoxychlor	10.0	0.001	ND	0.508	102
Chlordane	0.03	0.0002	ND	0.0022	110
Toxaphene	0.5	0.005	ND	0.0237	119
% Recovery					
2-Fluorophenol SURR	83				
Phenol-d5 SURR	103				
Nitrobenzene-d5	95				
2-Fluorobiphenyl SURR	89				
2,4,6-Tribromophenol SURR	84				
Terphenyl-d14 SURR	81				
Methods: EPA SW 846-8270/1311					

  
Kirk Robinson

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"Don't Treat Your Soil Like Dirt!"

October 12, 1994

EOTT Energy Corp.  
Ms. Lennah Frost  
P.O. Box 1660  
Midland, Texas 79702

**RECEIVED**

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OCD HOBBS  
OFFICE

Sample Matrix: Soil

Project: TCLP Soil Testing  
Requested By: Lennah Frost

Date Received: 9/23/94

Date Analyzed: 9/30/94

## CHEMICAL ANALYSIS REPORT

Parameter	Value (ppm)	EPA Limit (ppm)	QC	% Accuracy	Detection Limit
Sample ID: Justis G.S. Spill					
Arsenic (As)	<1.0	5.0	2.3	115	1.0
Selenium (Se)	<1.0	1.0	2.1	105	1.0
Chromium (Cr)	<1.0	5.0	1.98	99	1.0
Cadmium (Cd)	<1.0	1.0	2.0	100	1.0
Lead (Pb)	<1.0	5.0	2.0	100	1.0
Barium (Ba)	<10	100	100	100	10
Mercury (Hg)	<0.2	0.20	0.2	100	0.2
Silver (Ag)	<1.0	5.0	2.0	100	1.0

Methods: EPA SW-846-1311, 7061, 7080, 7130, 7420, 7190, 7471, 7741, 7760.

TCLP Metals QC: 2.0 ppm Cd, Cr, Pb and Ag; 2.0 ppm Se and As; 100 ppm Ba; and 0.20 ppm Hg.

  
Kirk Robinson

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

October 12, 1994

EOTT Energy Corp.  
Ms. Lennah Frost  
P.O. Box 1660  
Midland, Texas 79702

**RECEIVED**

DEC 06 1994

O C D HOBBS  
OFFICE

Sample Matrix: Soil

Project: TCLP Soil Testing  
Requested By: Lennah Frost

Date Received: 9/23/94  
Date Analyzed: 9/26/94

## CHEMICAL ANALYSIS REPORT

Parameter	Value	Units
Sample ID: Justis G.S. Spill		
Ignitability	Nonignitable	
Reactivity		
Sulfides (ppm)	<25.0	Nonreactive
Cyanides (ppm)	<2.5	
Corrosivity pH	8.30	Noncorrosive
Methods: EPA SW 846-2.1.1, 2.1.2, 2.1.3		

  
Kirk Robinson

Submit to Appropriate  
District Office in Triplicate

DISTRICT I  
PO Box 1980  
Hobbs, NM 88241-1980

DISTRICT II  
PO Drawer 149  
Artesia, NM 88211-0719

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

OIL CONSERVATION DIVISION  
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94 OCT 26 AM 8 52

DISTRICT III  
1000 Rio Brazos Rd.  
Aztec, NM 87410

DISTRICT IV  
PO Box 3488  
Santa Fe, NM 8750

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE		XXXXXXXXXXXXXXXXXXXXXXX
1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> Verbal Approval Received: Yes <input type="checkbox"/> No <input type="checkbox"/>	4. Generator EOTT Energy Pipeline	
2. Destination Environmental Plus, Inc.	5. Name of Originating Site Tank 810-X-Lea Sta., NM	
3. Address of Facility Operator P.O. Box 969 Eunice, NM 88231	6. Name of Transporter Waiting for approval	
7. Location of Material (Street Address or ULSTR) 5 mi. south of Monument, NM on Hwy 8 - Lea Station	8. State New Mexico	
9. <u>Circle One</u> A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-oilfield exempt wastes will be accompanied by a certification of waste status from the Generator and the New Mexico Environment Department or other appropriate government agency; two certificates per job. <input checked="" type="radio"/> C. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analyses to prove the material is non-hazardous and the Generator's certification of origin. No waste classified as hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.		

BRIEF DESCRIPTION OF THE MATERIAL:

The material was scraped from the floor of Tank 810-X at our Lea Station. The tank has been out of service for approximately 20 years. The tank was part of the purchase of a pipeline system from Shell Pipeline Corp. Shell cleaned out the tank when they took it out of service. Material we cleaned out is believed to be rust, sand and possibly scale from the sides and bottom of the tank.

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OCT 20 1994

OIL CONSERVATION  
OFFICE

Estimated Volume \_\_\_\_\_ cy Known Volume (to be entered by the operator at the end of the haul): \_\_\_\_\_  
I hereby certify that the information above is true and complete to the best of my knowledge and belief.  
SIGNATURE Lennah Frost TITLE Environmental & Safety Coordinator DATE 9/26/94  
Lennah Frost V.P.  
TYPE OR PRINT NAME Lennah Frost TELEPHONE NO. 915/687-2040

(This space for State Use)

APPROVED BY [Signature] TITLE ENVIRONMENTAL ENGINEER DATE 10/20/94  
APPROVED BY [Signature] TITLE GEOLOGIST DATE 10/27/94

CONDITIONS OF APPROVAL, IF ANY:

100-100

100-100

100-100

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**OCT 18 1994**

**JUD THORPE  
OFFICE**

CERTIFICATE OF WASTE STATUS  
NON-EXEMPT WASTE MATERIAL

Originating Location: Tank 810X, Lea Station, Lea County,

Source: Tank Floor

Disposal Location: Environmental Plus, Inc., P. O. Box 969,  
Eunice, New Mexico 88231

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. This waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3 (b) ."

I, the undersigned as the agent for the Generator  
concur with the status of the waste from the subject site.

Name Albert T. Hugh

Title/Agency Director  
Environmental & Safety  
EOTT ENERGY

Address P.O. Box 4666  
Houston, Texas 77210-4666

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**OCT 20 1994**

**OLD MUDS  
OFFICE**

Signature At Hugh

Date 10/10/94

**1001 1100**

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

September 13, 1994

EOTT Energy Corp.  
Ms. Lennah Frost  
P.O. Box 1660  
Midland, Texas 79702

Sample Matrix: Soil

Project: Tank Bottom Lea Sta. 810X  
Requested By: Lennah Frost

Date Received: 9/8/94  
Date Analyzed: 9/13/94

## CHEMICAL ANALYSIS REPORT

## CHEMICAL ANALYSIS REPORT

Parameter	Value	Units	EPA SW-846 Test Method
Sample ID: Tank Bottom Lea Sta. 810X			7420/1311
TCLP Lead	<0.1	ppm	

Total Lead QC: 2.0 ppm  
Detection Limit 0.1 ppm

QC (Quality Control)

	Result	% IA
TPH	2.00 ppm	100

  
Kirk Robinson

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OFFICE

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

September 9, 1994

EOTT Energy Corp.  
Ms. Lennah Frost  
P.O. Box 1660  
Midland, Texas 79702

Sample Matrix: Soil

Project: Tank Bottom Lea Sta. 810X  
Requested By: Lennah Frost

Date Received: 9/8/94  
Date Analyzed: 9/9/94

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OCCUPATIONAL  
OFFICE

## CHEMICAL ANALYSIS REPORT

Compounds	Actual (ppm)	Detection Limit (ppm)	QC	%IA
Sample ID: Tank Bottom Lea Sta. 810X				
Benzene	ND	0.1	0.122	122
Toluene	ND	0.1	0.088	88
Ethylbenzene	ND	0.1	0.087	87
Xylene (m,p)	ND	0.2	0.174	87
Xylene (o)	ND	0.1	0.087	87
Surrogate Spike	%Recovery			
a,a,a Trifluorotoluene	107			

QC= 100 ppb BTE (o)X & 200 ppb (m,p) X. Surrogate Spike=100 ppb a,a,a Trifluorotoluene  
Methods: EPA SW 846-8020/5030

ND = Not Detected

  
Kirk Robinson



OIL CONSERVATION DIVISION  
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94 FEB 2 AM 8 35

**CHARLIE BETTIS**  
(505) 394-3247  
Mobile 369-6063

**ENVIRONMENTAL PLUS, INC.**

STATE APPROVED LAND FARM

P.O. BOX 969  
EUNICE, NEW MEXICO 88231

OFFICE  
(505) 394-3481

January 31, 1994.

Ms. Kathy Brown  
State of NM  
Oil Conservation Division  
P.O. Box 2088  
Santa Fe, NM 87504

Dear Ms. Brown:

Please find enclosed the SWL report for contaminated soil from Texaco Plant north of Eunice, NM. We are requesting approval to accept this material for disposal at Environmental Plus, Inc., a state approved land farm located approximately four (4) miles south east of Eunice, NM.

Sincerely,

*Charlie Bettis*

Charlie Bettis  
Enclosures (1)

*Verbal Approval  
to accept Feb. 7, 1994  
Kathy Brown  
(previously approved to go to CPT)  
Source - general clean-up and housekeeping  
500-1000 yds*

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

September 9, 1994

EOTT Energy Corp.  
Ms. Lennah Frost  
P.O. Box 1660  
Midland, Texas 79702

Sample Matrix: Soil

Project: Tank Bottom Lea Sta. 810X  
Requested By: Lennah Frost

Date Received: 9/8/94  
Date Analyzed: 9/9/94

## CHEMICAL ANALYSIS REPORT

Parameter	Value	Units	EPA SW-846 Test Method
Sample ID: Tank Bottom Lea Sta. 810X			418.1/3550
Total Petroleum Hydrocarbons	13,676	ppm	

QC (Quality Control)  
Total Petroleum Hydrocarbons QC: 200 ppm  
Detection Limit 10 ppm

	Result	% IA
TPH	203 ppm	101

  
Kirk Robinson

RECEIVED  
OCT 20 1994  
OIL FIELD  
OFFICE



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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	Soil	File No.	6838498
Client	Texaco USA	Report No.	80535
Delivered by	Lorri Church/SwL Field Services	Report Date	04-20-93
		Date Received	04-01-93

Identification      Eunice Gas Plant, 16 point Composite, 0-6 in.,  
Sampled Around Engine Building, Sampled 04-01-93  
by SwL Field Services

## REPORT OF CHEMICAL ANALYSIS

<u>Parameters</u>	<u>Results</u>	<u>Date Performed</u>	<u>Analyst</u>	<u>Test Method</u>
Ignitability, °F	Greater than 150	04-02-93	C. Brooks	SW846, 1010 <sup>(a)</sup>
Corrosivity, (1:1) pH-Units	8.46	04-05-93	W. Jaycox	SW846, 9045
Reactive Sulfide, mg/kg	*2.0	04-17-93	L. Church	SW846, 9030
Reactive Cyanide, mg/kg	*2.0	04-06-93	W. Jaycox	SW846, 9012
Total Petroleum Hydrocarbons, mg/kg	11800	04-05-93	S. Stovall	SW846, 3550/ EPA 418.1

\* Denotes "less than"

(a) No Published method is available for flash point of solid material. After cooling, the sample particle size was reduced if necessary. The Flash point cup was packed to the fill line with sample. From this step Method 1010 from SW 846 was followed.

Copies: Texaco USA  
Attn: James Barger

C.B.

Reviewed by

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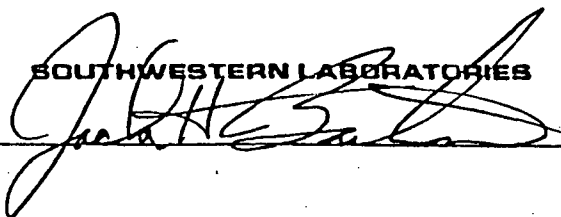
## REPORT OF TCLP METALS

<u>Parameters</u>	<u>Results, mg/L</u>	<u>Regulatory Level, mg/L</u>	<u>Date Performed</u>	<u>Analyst</u>	<u>Test Method</u>
Arsenic	*0.10	5.0	04-08-93	G. Bunch	SW846, 7061
Barium	1.3	100	04-09-93	G. Bunch	SW846, 7080
Cadmium	*0.10	1.0	04-09-93	G. Bunch	SW846, 7130
Chromium	*0.20	5.0	04-09-93	G. Bunch	SW846, 7190
Lead	*0.50	5.0	04-09-93	G. Bunch	SW846, 7420
Mercury	*0.010	0.2	04-09-93	G. Bunch	SW846, 7470
Selenium	*0.10	1.0	04-08-93	G. Bunch	SW846, 7741
Silver	*0.20	5.0	04-09-93	G. Bunch	SW846, 7760

\* Denotes "less than"

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C.B.  
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Report of tests on Soil  
Client Texaco USA  
Delivered by Lorri Church/SwL Field Services

File No. 6838498  
Report No. 80535  
Report Date 04-20-93  
Date Received 04-01-93

Identification Eunice Gas Plant, 16 point Composite, 0-6 in.,  
Sampled Around Engine Building, Sampled 04-01-93  
by SwL Field Services

## REPORT OF TCLP SEMIVOLATILE ORGANICS

Date of Analysis 04-13-93  
Analyst C. Martin

Method EPA SW846 3510/8270

<u>Compound</u>	<u>Results mg/L</u>	<u>Regulatory Level mg/L</u>
Pyridine	*0.02	5.0
1,4-Dichlorobenzene	*0.02	7.5
2-Methylphenol	*0.02	200
3-and 4-Methylphenol	*0.02	200
Hexachloroethane	*0.02	3.0
Nitrobenzene	*0.02	2.0
Hexachlorobutadiene	*0.02	0.5
2,4,6-Trichlorophenol	*0.02	2.0
2,4,5-Trichlorophenol	*0.02	400
2,4-Dinitrotoluene	*0.02	0.13
Hexachlorobenzene	*0.02	0.13
Pentachlorophenol	*0.02	100

\*Denotes "less than"

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Attn: James Berger

C.B.

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Report of tests on	Soil	File No.	6838498
Client	Texaco USA	Report No.	80535
Delivered by	Lorri Church/SwL Field Services	Report Date	04-20-93
		Date Received	04-01-93

Identification      Eunice Gas Plant, 16 point Composite, 0-6 in.,  
Sampled Around Engine Building, Sampled 04-01-93  
by SwL Field Services

## REPORT OF TCLP VOLATILE ORGANICS

Date of Analysis      04-08-93  
Analyst      R. Wright

Method      EPA SW846 5030/8240

<u>Compound</u>	<u>Results mg/L</u>	<u>Regulatory Level mg/L</u>
Benzene	*0.05	0.5
Carbon Tetrachloride	*0.05	0.5
Chlorobenzene	*0.05	100
Chloroform	*0.05	6.0
1,2-Dichloroethane	*0.05	0.5
1,1-Dichloroethylene	*0.05	0.7
Methyl Ethyl Ketone	*0.10	200
Tetrachloroethylene	*0.05	0.7
Trichloroethylene	*0.05	0.5
Vinyl Chloride	*0.10	0.2

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