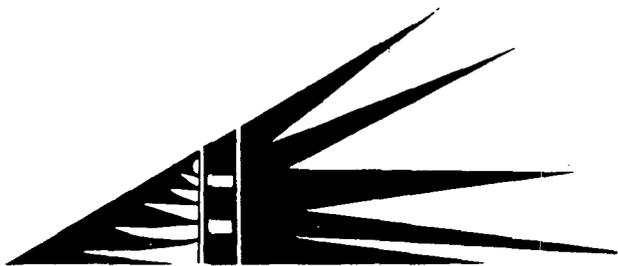


NM - 38

**INSPECTIONS &
DATA**



SOUTHWEST RESEARCH AND INFORMATION CENTER
P.O. Box 4524 Albuquerque, NM 87106 505-262-1862

July 29, 1992

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Environmental Protection Administration
Navajo Nation Division of Natural Resources
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Window Rock, AZ 86515

Mr. William J. LeMay, Director
New Mexico Oil Conservation Division
P.O. Box 2088
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Ms. Kathleen Sisneros, Director
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New Mexico Environment Department
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Mr. Leonard Tsosie, President
Whitehorse Lake Chapter, Navajo Nation
General Delivery -- Whitehorse Lake Chapter House
Whitehorse Lake, NM 87373

SUBJECT: FIELD RECONNAISSANCE OF PRODUCED WATER DISCHARGES
AT HOSPAH OIL FIELD, MCKINLEY COUNTY, NEW MEXICO

Dear Ms. Hoskie, Mr. LeMay, Ms. Sisneros, and Mr. Tsosie:

This letter and the attached documentation, including photographs, serve as a report of the results of a field reconnaissance study conducted by Southwest Research and Information Center (SRIC) staff in the Hospah Oil Field in eastern McKinley County on July 14 and July 27, 1992. (See Attachment I for general location.) The field work carried out by SRIC staff members Raymond Morgan and Chris Shuey on July 14 was conducted in conjunction with a series of water fairs sponsored by the New Mexico Environment Department (NMED) and Navajo Nation Environmental Protection Administration (NNEPA). Mr. Morgan revisited the area on July 27 to verify some of the observations we made on July 14.

This letter also gives SRIC's recommendations for regulatory actions that may be needed to address the range of surface water, ground water and air quality impacts that have resulted or may have resulted from oil production operations in the area.

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JUL 31 1992

OIL CONSERVATION DIVISION

Ms. Sadie Hoskie
Mr. William J. LeMay
Ms. Kathleen Sisneros
Mr. Leonard Tsosie
July 29, 1992
page 2

SUMMARY OF FINDINGS

Based on our observations and sampling data, SRIC believes that waters of the state are being adversely affected by discharges of produced water from oil-field production facilities in the Hospah area. We also believe that the health of people who live in the Hospah area is potentially, if not actually, affected by exposure to routine emissions of hydrogen sulfide gas from those same oil-field facilities. We communicated our observations and these findings to staff members of NNEPA and NMED's Surface Water Quality Bureau on July 15 and to staff members of the New Mexico Oil Conservation Division's Environmental Bureau (NMOCD/EB) on July 22. Photos documenting our observations were shown to NMOCD/EB staff on July 22.

DESCRIPTION OF THE STUDY AREA

The community of Hospah is located approximately 47 miles north of Grants and about 5.5 miles south of the community of Whitehorse Lake along Navajo Route 9 in eastern McKinley County. (See Attachment I.) It is located in the so-called checkerboard area, which consists of federal public lands, state public lands, and private lands interspersed with lands allotted to Navajo families.

The community itself consists of a number of buildings used as headquarters and lodging for employees of the American Exploration Company (AEC), which operates most of the oil wells and tank batteries in the area. A church and the homes of several Navajo families are located within three miles of the center of the community. Cattle and sheep graze throughout the area, which is characterized by bedrock outcrops on the north and south and topographic lows that coincide with the drainage pattern of Sandoval Arroyo, which flows to the east. (See Attachment II.)

OIL PRODUCTION ACTIVITIES IN THE HOSPAH OIL FIELD

Oil was first produced in the Hospah Oil Field in 1926. (Christiansen 1989) As of May 1988, the field was characterized by 97 producing oil wells operating on five different leases that cover parts of five sections in Township 18 North, Range 9 West and in T17N, R9W and T17N, R8W. (Boyer 1988) AEC, which took over operations in the Hospah Oil Field from Tesoro Petroleum Corporation in 1988, operates three large and one small oil-water storage and separation tank batteries, the locations of which are shown in Attachment II. Their names and location numbers are summarized on the following page:

Ms. Sadie Hoskie
Mr. William J. LeMay
Ms. Kathleen Sisneros
Mr. Leonard Tsosie
July 29, 1992
page 3

<u>Tank Battery</u>	<u>Location(s)</u>
Hospah Sand Unit (HSU) and Santa Fe Railroad "A" (SFR-A)	T18N,R9W,36; T18N,R8W,31; T17N,R9W,1
Hanson Federal (HF)	T17N,R8W,6
Santa Fe Railroad (SFR)	T17N,R8W,7
Santa Fe Railroad "B" (SFR-B)	T17N,R8W,5

Unlined skimming/settling ponds for produced water are associated with each of the four tank batteries. The typical designs of the two-cell ponds are shown in Photos 1 and 2, which are enclosed as part of Attachment III. The cells shown in these photos are contiguous; that is, fluids discharged from the pond in Photo 1 enter the pond shown in Photo 2 prior to discharge to an unnamed arroyo as shown in Photo 3.

Oil-water mixtures are pumped to the tank batteries, apparently by underground gathering lines; we observed no separation equipment, storage tanks or disposal pits at the sites of individual producing wells. An unknown volume of produced water is used for enhanced oil recovery. (Boyer 1988) Anywhere from 58 to 175 gallons per minute (0.08 to 0.25 million gallons per day) of produced water are discharged to Sandoval Arroyo or its tributaries from the skimming/settling ponds at the four tank batteries. (Boyer 1988) Many of the producing wells are stripper wells, according to NMOCD/EB staff members. (We did not inspect NMOCD production records to determine how many wells produce from the Hospah pool, nor how many of those wells are stripper wells.)

Our reconnaissance was confined to an area located south and southeast of the community in section 1 of T17N, R9W and in sections 5, 6, 7 and 8 of T17N, R8W. All four tank batteries shown in Attachment II are within the areas we visited.

FIELD OBSERVATIONS MADE ON JULY 14

During our initial visit to the Hospah area on July 14, we observed and photographed the following:

- Grayish produced water exhibiting an oil sheen being discharged from skimming/settling ponds at the SFR tank battery in section 7 of T17N, R8W to an unnamed tributary of Sandoval Arroyo; (See Attachment II for

Ms. Sadie Hoskie
Mr. William J. LeMay
Ms. Kathleen Sisneros
Mr. Leonard Tsosie
July 29, 1992
page 4

location and Photos 1 through 4 in Attachment III.)

- Black, oily stains on the banks and in the bottom sediments of the receiving watercourse and for at least several hundred meters downstream of its confluence with Sandoval Arroyo; (See Attachment II for locations and Photos 5 through 12 in Attachment III.)
- Grayish flow in Sandoval Arroyo approximately 0.4 miles downstream from an outfall at skimming/settling ponds associated with the HSU/SFR-A tank battery in section 1 of T17N, R9W.

Discharges to Sandoval Arroyo and its tributaries were observed from the skimming/settling ponds at the SFR and HSU/SFR-A tank batteries on this date. No discharges were observed from the ponds associated with the Hanson Federal and SFR-B tank batteries. (See Attachment II for locations.)

The black material that we observed on the banks and in the bottom sediments (see Photos 6, 7, 9, 11 and 12) was oily to the touch. The extent and degree of staining diminished with distance from the outfall point at the SFR tank battery. However, we observed black staining and black bottom sediments in Sandoval Arroyo near the section 5 fence line and again in Sandoval Arroyo about 1 mile upstream from Sandoval Lake in the northeastern corner of section 4. (See Attachment II.) We also observed grayish sediments on the banks of Sandoval Lake, which is a wetland that contains marsh plants and is located behind a constructed earthen dam. The produced water discharges from the upstream tank batteries are the only significant sources of water to the lake; runoff from rain and snowmelt is limited in this arid, pinon-juniper landscape.

We observed oil sheens on the surface of fluids in the unnamed tributary to Sandoval Arroyo at points where the velocity of the flow slowed significantly. We observed no oil sheen on the surface of water in the southern portion of Sandoval Lake within a dozen meters of the earthen dam.

SAMPLING CONDUCTED ON JULY 14

On July 14, we collected two samples of fluids from the unnamed arroyo at a point a few meters downstream from a culvert under Sand Spring Road just inside the fence line in section 6. We also collected one sample of water from a hose at the residence of Lena and Roger Tsosie in the southwestern corner of section 6. (See Attachment II.)

Ms. Sadie Hoskie
Mr. William J. LeMay
Ms. Kathleen Sisneros
Mr. Leonard Tsosie
July 29, 1992
page 5

SURFACE WATER SAMPLES. From fluids in the unnamed arroyo, we collected one sample in a 1-gallon plastic cubitainer, leaving approximately one inch of headspace in the container. The spout of the container was sealed with a piece of aluminum foil secured by a rubber band. We collected a second set of samples in two 40-milliliter (ml) glass vials equipped with septums inside the caps. (These vials were provided by NMED.) We submerged each vial in the fluids of the watercourse and made sure that neither vial contained air bubbles after they were sealed. Even though all three sample containers were new, we rinsed each with fluids from the watercourse before sealing the containers. All three sample containers were placed on ice in a standard 48-quart Coleman cooler. Each sample was separately identified by the standard identification method used by NMED and NMOCD (i.e., two-digit year, two-digit month, two-digit day, and four-digit time). An NMED "Water Well Field Test" form was used to record the sampling location and identification number for the 1-gallon sample. (See Attachment IV.)

DOMESTIC WATER SAMPLE. We collected a 1-gallon sample of water from a hose at the Tsosie residence. We allowed the water to run for five minutes prior to collecting the sample in a plastic cubitainer. The sample was identified by the standard method and a water fair form was completed. It is enclosed as Attachment V.

The hose at the Tsosie residence is connected to a value box located about 50 meters from the home. The value box is connected to an underground pipeline that contains water from a domestic well at the AEC headquarters in Hospah. Mrs. Tsosie said the family uses the water from the community well for livestock watering, gardening, and most domestic uses except drinking. She said the family uses the water for drinking only during periods of the year when travel is limited by weather and road conditions; otherwise, she said, the family hauls its drinking water from Crownpoint, about 40 miles (by road) from Hospah. Mrs. Tsosie said she does not drink water from the community water system because it develops a colorful sheen after sitting in a barrel inside her home. (The barrel was empty on the day of our visit.)

ANALYTICAL RESULTS -- SURFACE WATER SAMPLES. Surface waters collected in the 1-gallon cubitainer were analyzed on July 15 at the Manuelito (N.M.) Chapter Water Fair sponsored by NNEPA and NMED. Water fair analytical results are shown in Attachment IV and are summarized on the following page:

Ms. Sadie Hoskie
Mr. William J. LeMay
Ms. Kathleen Sisneros
Mr. Leonard Tsosie
July 29, 1992
page 6

<u>Parameter</u>	<u>Result</u>	<u>Regulatory Standard</u>
Conductivity	2650 μ mhos/cm	1000 μ mhos/cm*
Iron	0 mg/l	1.0 mg/l**
Nitrate	1.8 mg/l	10 mg/l***
Organic Vapor	>100 ppm	<10 ppm rec'd****
pH	8.5	6-9 units***
Sulfate	>250 mg/l	250 mg/l***

- * NMED recommended limit.
- ** N.M. Water Quality Control Commission Regulation 3-103.B. for ground water.
- *** USEPA primary and secondary drinking water standards, 40 CFR Part 141.
- **** NMOCD recommended limit.

A flame ionization detector (FID) was used by NMED personnel to test for organic vapors in the headspace of the sample container. A concentration meter attached to the FID was observed by SRIC staff to go off the scale immediately after the instrument's probe was inserted into the container through the aluminum foil seal. At the time the concentration was measured, the meter was set as a maximum detection limit of 100 ppm. A strong hydrocarbon and sulfide odor emanated from the container after it was opened.

The two 40-ml vial samples were kept in an ice bath until transported to the state Scientific Laboratory Division (SLD) by SRIC staff on July 17. Based on advice from staff members of the NMED Ground Water Bureau, we requested that the samples be analyzed for aromatic and halogenated VOCs (volatile organic compounds) according to USEPA methods 601 and 602. A copy of the SLD analytical chemistry request form is enclosed as Attachment VI. Analytical results are pending and will be reported to all agencies as soon as they are available.

The discharge from the SFR tank battery was sampled by NMOCD in 1988. According to the SLD analytical results form, which is enclosed as Attachment VII, NMOCD/EB staff members observed "some color, HC [hydrocarbon] odor" in the fluids in the arroyo about 0.5 miles downstream from the tank battery outfall. As shown in Attachment VII, halogenated VOCs were not detected in the fluids, but 55 light-end hydrocarbon compounds were detected in the 1-to-5 ppm range. Laboratory conductivity, pH and iron values of the 1988 sample were similar to the values reported in the 1992 water fair analyses for the fluids discharged from the SFR tank battery. It is important to note that both samples showed nondetectable

Ms. Sadie Hoskie
Mr. William J. LeMay
Ms. Kathleen Sisneros
Mr. Leonard Tsosie
July 29, 1992
page 7

concentrations of iron in the produced water.

ANALYTICAL RESULTS -- TSOSIE DOMESTIC WATER. Water fair analytical results for the sample of water from the hose at the Tsosie residence are shown in Attachment V. No organic vapors were detected in the sample. The inorganic results are similar to those reported by NMOCD for a sample collected from the AEC community water well on August 4, 1989. (NMOCD 1989) The two sets of results are summarized below:

<u>Parameter</u>	<u>August 1989 Result</u>	<u>July 1992 Result</u>
Conductivity	1000 μ mhos/cm	966 μ mhos/cm (lab)
Iron	0.08 mg/l	0. mg/l
Nitrate	0.4 mg/l	0. mg/l
Organic Vapors	ND	---
Aromatic and Halogenated VOCs	---	ND
pH	8.5 units	8.4 units (lab)
Sulfate	>250 mg/l	268 mg/l
Total Diss. Solids	---	658 mg/l

ND not detected
--- not analyzed

FIELD OBSERVATIONS MADE ON JULY 27

Mr. Morgan of the SRIC staff revisited the Hospah area on July 27 for the purpose of confirming the names and locations of the tank batteries listed above and for remeasuring distances between those batteries and the Tsosie residence. While in the field, Mr. Morgan observed produced water discharges from the SFR tank battery and from the HSU/SFR-A tank battery. The fluids discharged from the SFR tank battery ponds were black, not grayish as noted during our visit on July 14. Mr. Morgan described the fluids as oily to the touch.

PRESENCE OF HYDROGEN SULFIDE GAS

On July 14, we noted strong sulfide odors emanating from the produced water outfall at the SFR tank battery and in the unnamed arroyo at the culvert under Sand Spring Road. These same odors were evident near Lena Tsosie's home, which is situated in a low-lying area approximately 325 meters north of the SFR tank battery. (See Attachment II.) Mrs. Tsosie reported that "sewer-like" smells were pervasive around her home during calm weather.

Ms. Sadie Hoskie
Mr. William J. LeMay
Ms. Kathleen Sisneros
Mr. Leonard Tsosie
July 29, 1992
page 8

conditions and especially during the early morning hours just before dawn. She said the smells are strong enough to disturb the family's sleep and occasionally to make family members feel nauseous. Mrs. Tsosie's statements were recorded in our field notes, which are enclosed as Attachment VIII.

Sulfide odors were present throughout the area upon Mr. Morgan's inspection on July 27. He reported that the smells were noticeable near the tank batteries and in the unnamed arroyo near our sampling point at the culvert under Sand Spring Road.

DISCUSSION OF OBSERVATIONS AND RESULTS
AND RECOMMENDATIONS FOR REGULATORY ACTION

PRODUCED WATER DISCHARGES. AEC applied to the U.S. Environmental Protection Agency (Region VI) for a National Pollutant Discharge Elimination System (NPDES) permit in October 1988. (Quiroga 1988) The information available to SRIC does not indicate whether EPA ever acted upon the application. NMED and NMOCD officials told us that to their knowledge AEC does not have an NPDES permit for discharges of produced water to Sandoval Arroyo and its tributaries.

Discharges of produced water to "waters of the United States" were prohibited under a zero-discharge general permit issued by EPA Region VI on February 25, 1991. (USEPA 1991; 56 *Federal Register* 7696-7708) Certainly, the Sandoval Arroyo surface-water system is a "water of the United States" for purpose of regulation under the federal Clean Water Act's NPDES program. However, there are at least two significant exceptions to the zero-discharge permit.

The first exception allows discharges of produced water to waters of the U.S. in cases where the discharged fluids have "a use in agriculture or wildlife propagation . . ." (See 40 CFR Part 435.50.) Produced waters may be discharged, subject to conditions of an NPDES permit, if the quality of the waters "is good enough for wildlife or livestock watering or other agricultural uses . . ." (See 40 CFR Part 435.51(c).) The discharges in the Hospah area are used for livestock purposes; they may also be used for wildlife purposes to the extent that wildlife use Sandoval Lake.

The second exception allows discharges of produced water from stripper oil wells, which are defined as wells that produce 10 barrels of crude oil per day or less. (See 40 CFR Part 435.60.) Whether an NPDES permit is required for stripper-well discharges to waters of the U.S. is unclear.

Ms. Sadie Hoskie
Mr. William J. LeMay
Ms. Kathleen Sisneros
Mr. Leonard Tsosie
July 29, 1992
page 9

The extent to which the Clean Water Act's NPDES program or the New Mexico Water Quality Control Commission's (NMWQCC) standards for interstream streams apply to the produced water discharges in the Hospah area should be clarified. Effluent discharges to waters of the United States, unless otherwise exempted from NPDES requirements, are illegal without an NPDES permit and subject to private causes of action under the Clean Water Act. (See 33 U.S.C. section 1365.) Appropriate steps should be taken by the appropriate regulatory agencies to eliminate or mitigate the apparent adverse effects of AEC's discharges to the Sandoval Arroyo system.

TANK BATTERIES AND UNLINED PONDS. The four tank batteries operated by AEC in the Hospah area are centralized facilities and can be regulated under NMOCD Rule 711. NMOCD/EB officials said that to their knowledge neither AEC nor its predecessor had applied for Rule 711 permits for the tank batteries in the Hospah area. The officials said they will conduct an inspection of the area and determine if such permits are needed.

All of the skimming/settling ponds at the four tank batteries are unlined. We observed no evidence of ground-water monitoring at any of the ponds. While the two water wells that are known to exist in the immediate area of the tank batteries (the AEC community well and Navajo Nation windmill 15T-564) tap deep aquifers that may be protected from near-surface contamination, any shallow alluvial ground water that meets the State Engineer's definition of fresh water must be protected under the New Mexico Oil and Gas Act. (See section 70-2-12.B(15) N.M.S.A. 1978.) As such, SRIC believes that NMOCD must require ground-water monitoring to determine if alluvial ground water is present and whether it is fresh water protectable under the Oil and Gas Act. If it is, NMOCD must require measures to protect that ground water from contamination by leakage of produced water from ponds at the AEC tank batteries.

AEC'S COMMUNITY WATER WELL. The extent to which AEC's community water well should be regulated as a public water supply under the federal Safe Drinking Water Act should be determined by the appropriate regulatory agency. SRIC could not determine how many people drink continuously from the AEC community water system, but it was clear from our investigation that a community system exists by virtue of the fact that a pipeline delivers water from the AEC well to several points within the area.

HYDROGEN SULFIDE EMISSIONS. Based on the statements of Mrs.

Ms. Sadie Hoskie
Mr. William J. LeMay
Ms. Kathleen Sisneros
Mr. Leonard Tsosie
July 29, 1992
page 10

Tsosie and observations made by SRIC staff members on two different occasions, hydrogen sulfide emissions are routine in the Hospah area and, occasionally during calm weather conditions, cause discomfort among members of the Tsosie family. Since H₂S is heavier than air, it clings to the surface and can travel substantial distances from its source or sources. The Tsosie residence is located in a low-lying area within one-half mile of three tank batteries, at least one of which is situated at a higher elevation than that of the Tsosie residence.

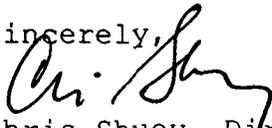
NMED, which has regulatory responsibilities for air quality protection, and NMOCD, which has statutory responsibilities to protect public health, should require H₂S monitoring in the area and determine, based on the results of that monitoring, if AEC should be required to take steps to prevent or abate hydrogen sulfide releases from its wells and production facilities.

CONCLUDING REMARKS

The results of SRIC's study of discharges in the Hospah Oil Field are similar to those reported by NMOCD staff members in years past. Attention to the observed environmental and potential public health problems in the area has been low due to the remoteness of the Hospah Oil Field and, quite possibly, to the limited number of staff that state and tribal agencies can devote to field reconnaissance. SRIC's participation in the joint NNEPA-NMED water fairs during the week of July 13 was intended to assist the two agencies in identifying actual or potential water quality concerns in the Navajo Nation's Eastern Agency. This we accomplished as this report and its accompanying documentation demonstrate. Coordinated regulatory action by state, tribal and federal agencies is needed to confirm these findings and to remedy any environmental violations that may exist.

SRIC stands ready to continue to assist state and tribal agencies in environmental surveillance efforts. Please feel free to call us if you have questions about this report or need additional information.

Sincerely,


Chris Shuey, Director
Community Water Quality Program
w: 505-262-1862


Raymond Morgan
SRIC Navajo Community Liaison
h: 505-862-7202

Ms. Sadie Hoskie
Mr. William J. LeMay
Ms. Kathleen Sisneros
Mr. Leonard Tsosie
July 29, 1992
page 11

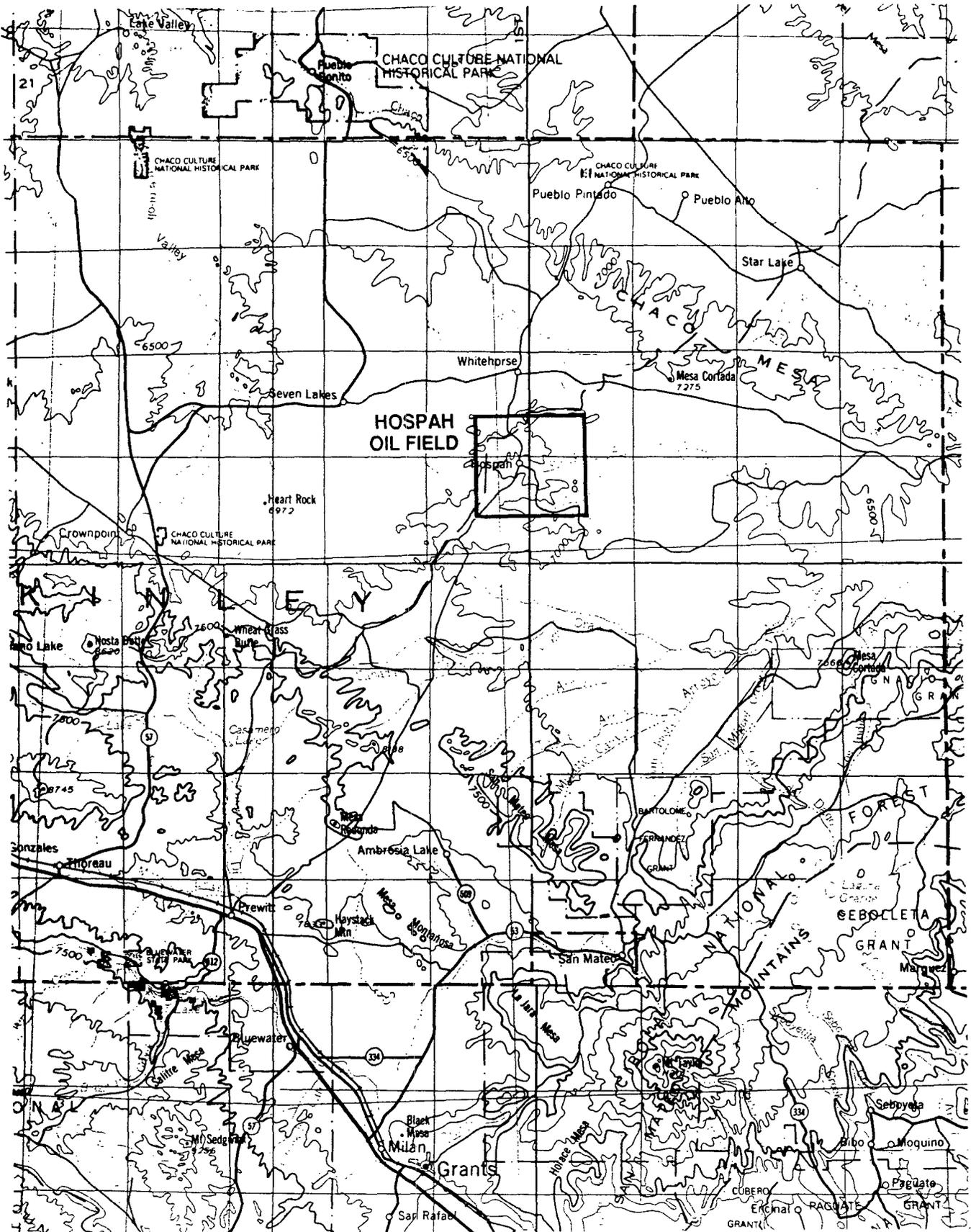
xc (without photographs):

Roger Anderson, Chief, NMOCD Environmental Bureau
Frank Chavez, District Manager, NMOCD Aztec District
Amos Johnson, NNEPA Public Water Supply Program
Myron Knudson, USEPA Region VI, Water Management Division
Jim Piatt, NMED Surface Water Quality Bureau
Lena and Roger Tsosie, Hospah residents

REFERENCES

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- NMOCD 1989. New Mexico Oil Conservation Division. Scientific Laboratory Division Analytical Reports No. OR-89-1222 and No. WC-2814; received October 3, 1989, and October 25, 1989, respectively.
- Quiroga 1988. Quiroga, Roy (American Exploration Company). Letter to Myron Kaudson [sic] (U.S. Environmental Protection Agency, Dallas), re: NPDES Surface Water Discharge Permit, Hospah Field, McKinley County, New Mexico; October 13, 1988.
- USEPA 1991 U.S. Environmental Protection Agency. Final NPDES General Permits for the Oil and Gas Extraction Point Source Category -- States of Louisiana (LAG320000), New Mexico (NMG320000), Oklahoma (OKG320000), and Texas (TXG320000). 56 *Federal Register* 7696-7708, February 25, 1991.

ATTACHMENT I



Map modified from U.S. Geological Survey State of New Mexico 1:500,000 scale map, revised 1985.

ATTACHMENT II

T18N
T17N

107°45'
35°45'

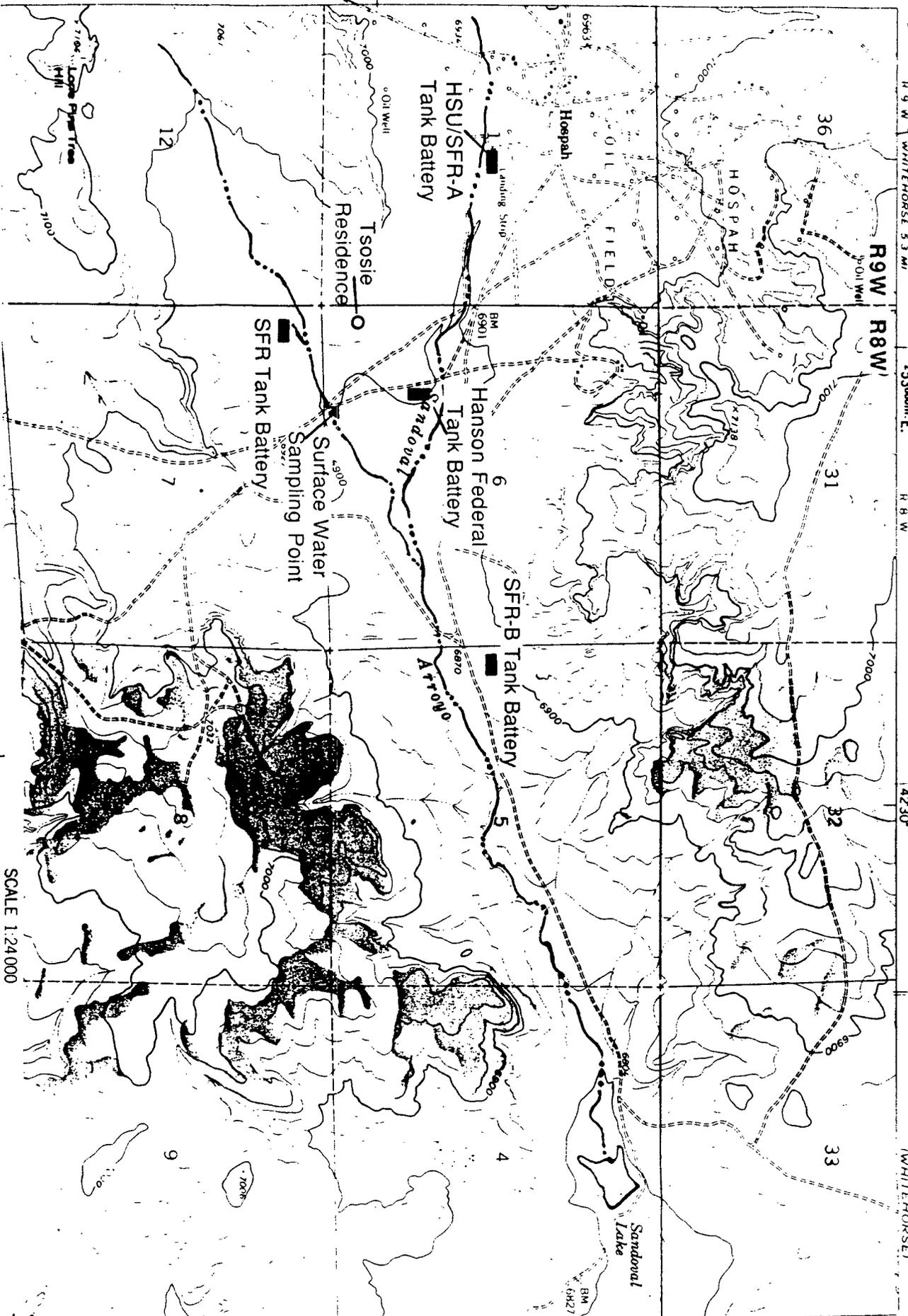
R 9 W WHITEHORSE 5.3 MI

253000m. E.

R 8 W

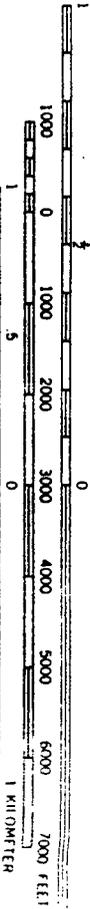
14230'

WHITEHORSE I



HOSP AH QUADRANGLE
NEW MEXICO - MCKINLEY CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)

SCALE 1:24,000



CONTOUR INTERVAL 20 FEET
DATUM IS MEAN SEA LEVEL

ATTACHMENT III

IDENTIFICATION OF HOSPAH-AREA PHOTOS*

Photo No.	Description
1	Primary skimming/settling pond for produced water discharges from American Exploration Company Santa Fe Railroad (SRF) tank battery in NW1/4 of NW1/4 of Section 7, T17N, R8W, McKinley County, New Mexico; the closest residence is approximately 325 meters north of this point and approximately 10 to 15 meters lower in elevation.
2	Secondary skimming/settling pond that receives produced water from the primary pond in Photo 1; neither ponds have liners; both have netting for protection of migratory birds; strong hydrogen sulfide odor noted around tank battery.
3	Produced water outfall from secondary skimming/ settling pond.
4	Oily stains observed on dirt and vegetation at discharge point from secondary pond.
5	Produced water discharged to unnamed arroyo, which is a tributary to Sandoval Arroyo; confluence of two streams is approximately 1,300 meters from this point; arroyo trends in a northeasterly direction.
6	Black stains on banks of unnamed arroyo approximately 150 meters downstream from discharge point shown in Photo 5; these stains were oily to the touch; discharge pipe and SFR tank battery is visible in background.
7	Closeup of black, oily stains on banks and bottom sediments of unnamed arroyo at same location as in Photo 6.
8	Fluid in unnamed arroyo flows through a culvert under a dirt road locally called Sand Spring Road; this point is at a fence line which marks the boundary between section 7 to the south and section 6 to the north; cattle were observing drinking the fluid in the arroyo shortly before this photo was taken; black stains on banks and bottom sediments were oily to the touch.
9	Black, oily stains on banks, vegetation and bottom sediments at culvert approximately 160 meters downstream from SFR tank battery; strong hydrogen sulfide odor present at this location; one 1-gallon sample and two 40-milliliter samples of fluids in arroyo collected at this location; subsequent water fair analyses of the fluids showed conductivity of 2650 micromhos/centimeter, pH of 8.5, nitrate concentration of 1.8 milligrams

per liter (mg/l), sulfate concentration greater than 250 mg/l, and organic vapor level of greater than 100 parts per million, based on a flame ionization detector meter reading.

- 10 Same point in unnamed arroyo looking downstream from culvert under Sand Spring Road.
- 11 Closeup of black, oily stains on banks and bottom sediments approximately 10 meters downstream from culvert under Sand Spring Road; vegetation kills were apparent in stream and along its banks; oily sediments observed to at least 15 centimeters in stream bottom.
- 12 Black stains on banks and black, oily bottom sediments observed in Sandoval Arroyo approximately 300 meters downstream from confluence with unnamed arroyo shown in Photos 1 through 11; this point is approximately 100 meters from a fence that marks the eastern boundary of section 6 and the western boundary of section 5 at an elevation of approximately 6,860 feet; black and gray staining in Sandoval Arroyo observed again about 0.5 miles downstream from this point.

* All photos taken by Southwest Research and Information Center staff on July 14, 1992.

cls/sric/7-24-92



Photo No. 1

American Exploration Co.
Santa Fe RR Tank Battery
7.17N.8W.7.11; Hospah, NM
primary skimming pond
7-14-92



Photo No. 2

American Exploration Co.
Santa Fe RR Tank Battery
17N.8W.11, Hoshah, NM
secondary skimming pond
(7-14-92)



Photo No. 3

Produced water outfall from
secondary skimming pond at
American Exploration Co. Santa
Fe RR Tank Battery at Hospah,
NM. (7-14-92)



Photo No. 4

Closeup of AEC outfall into
unnamed tributary to Sandoval
Arroyo, 7-14-92.



Photo No. 5

AEC discharge to unnamed
tributary of Sandoval Arroyo
17.8.7.1, McKinley County
(7-14-92)



Photo No. 6

Black, oily stains on banks of
unnamed arroyo appx. 150 meters
downstream of AEC SFR outfall;
(7-14-92)



Photo No. 7

Closeup of oily stains on
banks and sediments downstream
of AEC-SFR outfall (7-14-92)



Photo No. 8

Cattle were observed drinking
from unnamed arroyo fed by
produced water discharges from
AEC-SFR tank battery (7-14-92)



Photo No. 9

Black, oily stains and sediments
in arroyo 160 meters downstream
of AEC-SFR outfall; SRIC
sampling location (7-14-92)

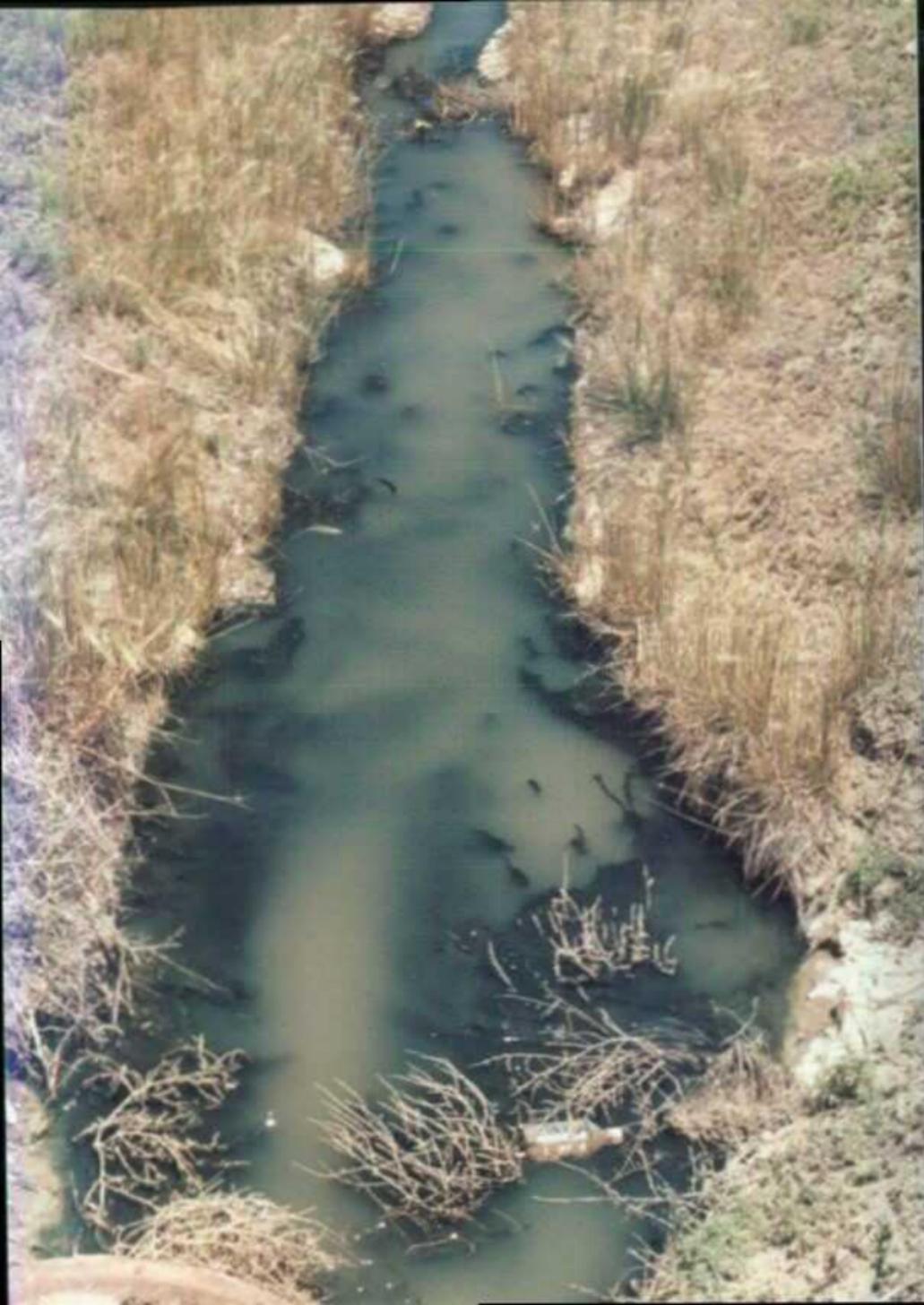


Photo No. 10

SRIC sampling location looking
downstream(7-14-92)



Photo No. 11

Vegetation kills, strong H₂S
odor in unnamed arroyo receiving
receiving produced water
(7-14-92)



Photo No. 12

Gray murky water w/ black oily
texture on banks, in sediments
of Sandoval Arroyo (7-14-92)

Mrs. Tsosie said Bob Durbin is no longer the "foreman for the oil company. Another man from Texas is; she doesn't know his name.

Mrs. Tsosie says the family becomes nauseated at the ~~smell~~ "sewer-like" smell when the air is calm. [H_2S ?]
She wonders if the smell is from sewer discharges at Hospah or oil wastewater or both.

Strong H_2S smells were evident to us when we were at the Tsosie residence, and later again when taking samples of surface water at the culvert under Sand Spring Road & downstream from one of the tank batteries. Tsosie residence is situated in topographic low & surrounded on south & west by producing wells & 2 tank batteries, both of which are higher in elevation.

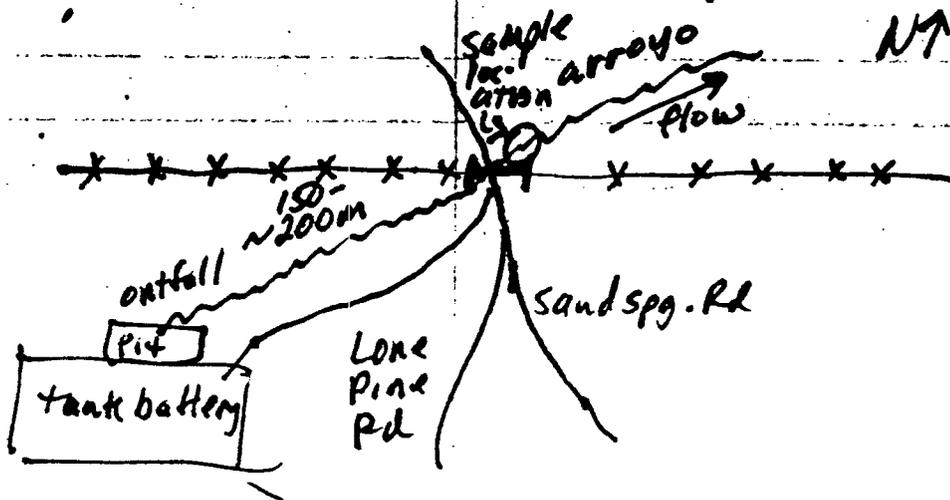
9207141315

Collected 1-gal. sample of water from flowing stream, downstream from oil & gas tank battery, for water fair analyses.

9207141321

photos taken!

Collected 2 40-ml samples of water in same arroyo for VOC/lab analyses. Submerged vials for good samples; no air bubbles present. Sediments oily to touch. Water was murky w/ discernible oily sheen and oily/sulfury smell. Banks of arroyo were black w/ HC staining. Bottom sediments turned water black when churned up.



a Complaint to Nav. EPA by Roger
Tsosie. (see Haspah oil & gas file.)
OCD analyses showed no VOCs, TPH.
^{Tososie}
^{months}

OCD determined water was from Durbin
domestic water at Haspah Community
w/ 1.2 miles NW of Tsosie residence.
Area is characterized by numerous producing
oil wells & tank batteries operated
by American Exploration Co. Mrs.
Tsosie confirmed that the water ^{from} her
hose comes from a main well at Haspah.

Location as best as we can determine is
~~17.1.8W. 7. 11. 17.8.6. 3412~~
17.8.6. 3412

C. Shuey, R. Morgan 9/14/92

Mrs. Tsosie says her family is 6 people.
She thinks another Navajo family
nearby may be on the same water
system, but isn't sure. A mission at
the community is on the system. The Durbin
residence is also on system.

ATTACHMENT VIII

(Field notes of C. Shuey, SRIC, 7/14/92)

Sample # 9207141159

Water from hose at Tsosie residence
S/E Hospah community. Allowed water
to run for 5 minutes to clear line
from valve box ~ 130 meters away.
Collected unfiltered, unpreserved sample
in 1-gal. cubitainer. Water was
clear; slight whitish film on top. No
smells, no unusual tastes.

Talked to Leac Tsosie who said an oily
sheen often develops on top of water
when it's left standing in a barrel
inside the house. For that reason,
the family doesn't usually use that
water for ~~drinking~~ drinking - only in an
emergency. ^{They get} Drinking water from
Crowpoint (hauled). Family uses water
from the hose for livestock, bathing,
cooking, cleaning.

This water source was sampled &
tested by OCD in Aug. '89 following

CATIONS			
ANALYTE	MEQ.	PPM	DET. LIMIT
Ca	0.50	10.00	<3.0
Mg	0.30	3.70	<0.3
Na	27.88	641.00	<10.0
K	0.08	3.00	<0.3
Mn	0.00	0.00	
Fe	0.00	0.00	
SUMS	28.76	657.70	
Total Dissolved Solids=			1818
Ion Balance =			106.73%

ANIONS			
ANALYTE	MEQ.	PPM	DET. LIMIT
HCO3	11.54	704.00	<1.0
SO4	11.29	542.00	<10.0
CL	4.12	146.00	<5.0
NO3	0.00	0.00	< 0.
CO3	0.00	0.00	< 1.
NH3	0.00	0.00	< 0.
PO4	0.00	0.00	< 0.
	26.95	1392.00	

WC No. = 8801347
 Date out/By



New Mexico Health and Environment Department
 SCIENTIFIC LABORATORY DIVISION
 700 Camino de Salud NE
 Albuquerque, NM 87106 -- (505) 841-2555

859
 WNN GENERAL WATER CHEMISTRY
 and NITROGEN ANALYSIS

DATE RECEIVED: 4/21/88	LAB NO.: WNC-1347	USER CODE: <input type="checkbox"/> 59300 <input type="checkbox"/> 59600 <input checked="" type="checkbox"/> OTHER: 82235
Collection DATE: 05/04/19	SITE INFORMATION	Sample location: Tesoro Oil - Final Outfall
Collection TIME: 1105		Collection site description: Hospah
Collected by: Boyle/Railey IOCD		

SEND FINAL REPORT TO
 ENVIRONMENTAL BUREAU
 NM OIL CONSERVATION DIVISION
 State Land Office Bldg, PO Box 2088
 Santa Fe, NM 87504-2088
 Attn: David Boyer
 Phone: 827-5812

Station/well code: T17N, R8W, G.42A
 Owner:

SAMPLING CONDITIONS

<input type="checkbox"/> Bailed	<input type="checkbox"/> Pump	Water level	Discharge	Sample type
<input checked="" type="checkbox"/> Dipped	<input type="checkbox"/> Tap	-	175 gpm	Grab
pH (00400): 9.5	Conductivity (Uncorrected): 2200 μ mho	Water Temp. (00010): 17 $^{\circ}$ C	Conductivity at 25 $^{\circ}$ C (00094): μ mho	
Field comments: Discharge from Final Oil-Water Separator to array				

SAMPLE FIELD TREATMENT — Check proper boxes

No. of samples submitted: 1	<input checked="" type="checkbox"/> NF: Whole sample (Non-filtered)	<input type="checkbox"/> F: Filtered in field with 0.45 μ m membrane filter	<input type="checkbox"/> A: 2 ml H ₂ SO ₄ /L added
<input checked="" type="checkbox"/> NA: No acid added	<input type="checkbox"/> Other-specify:	<input type="checkbox"/> A: 5ml conc. HNO ₃ added	<input type="checkbox"/> A: 4ml fuming HNO ₃ added

ANALYTICAL RESULTS from SAMPLES

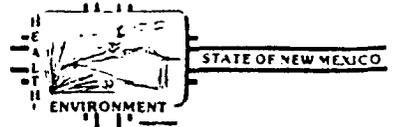
NA	Units	Date analyzed	From NF, NA Sample:	Date Analyzed
<input checked="" type="checkbox"/> Conductivity (Corrected) 25 $^{\circ}$ C (00095)	μ mho	6/3	Calcium	5/19
<input type="checkbox"/> Total non-filterable residue (suspended) (00530)	mg/l		Potassium	5/10
<input checked="" type="checkbox"/> Other: Lab pH	8.68	6/3	Magnesium	5/19
<input type="checkbox"/> Other:			Sodium	5/10
<input type="checkbox"/> Other:			Bicarbonate	6/3
A-H₂SO₄			Chloride	5/25
<input type="checkbox"/> Nitrate-N + Nitrate-N total (00630)	mg/l		Sulfate	"
<input type="checkbox"/> Ammonia-N total (00610)	mg/l		Total Solids	5/20
<input type="checkbox"/> Total Kjeldahl-N ()	mg/l			
<input type="checkbox"/> Chemical oxygen demand (00340)	mg/l			
<input type="checkbox"/> Total organic carbon ()	mg/l			
<input type="checkbox"/> Other:			<input checked="" type="checkbox"/> Cation/Anion Balance	
<input type="checkbox"/> Other:			Analyst	Date Reported
Laboratory remarks: 129			6/7/85	Reviewed by: [Signature]

FOR OCD USE -- Date Owner Notified 6/27/85 Phone or Letter? Initials: [Signature]



ATTACHMENT VII

SCIENTIFIC LABORATORY DIVISION
700 Camino de Salud NE
Albuquerque, NM 87106 841-2570



REF: David Boyer S.L.D. No. OR- 501-A+B
88-0501-C N.M. Oil Conservation Division DATE REC. 4/21/88
P. O. Box 2088
Santa Fe, N.M. 87504-2088 PRIORITY 3
 PHONE(S): 327-5812 USER CODE: 3 2 2 3 5
 SUBMITTER: David Boyer CODE: 2 6 0
 SAMPLE COLLECTION CODE: (YYMMDDHHMMIII) 8804191105D88
 SAMPLE TYPE: WATER SOIL FOOD OTHER: _____ CODE: _____
 COUNTY: McKinley CITY: Hospah CODE: _____
 LOCATION CODE: (Township-Range-Section-Tracts) 17N+08W+06+424 (10N06E24342)

ANALYSES REQUESTED: Please check the appropriate box(es) below to indicate the type of analytical screens required. Whenever possible list specific compounds suspected or required.

- | PURGEABLE SCREENS | EXTRACTABLE SCREENS |
|---|--|
| <input type="checkbox"/> (753) Aliphatic Purgeables (1-3 Carbons) | <input type="checkbox"/> (751) Aliphatic Hydrocarbons |
| <input checked="" type="checkbox"/> (754) Aromatic & Halogenated Purgeables | <input type="checkbox"/> (760) Organochlorine Pesticides |
| <input type="checkbox"/> (765) Mass Spectrometer Purgeables | <input type="checkbox"/> (755) Base/Neutral Extractables |
| <input type="checkbox"/> (766) Trihalomethanes | <input type="checkbox"/> (758) Herbicides, Chlorophenoxy acid |
| Other Specific Compounds or Classes | <input type="checkbox"/> (759) Herbicides, Triazines |
| <input type="checkbox"/> _____ | <input type="checkbox"/> (760) Organochlorine Pesticides |
| <input type="checkbox"/> _____ | <input type="checkbox"/> (761) Organophosphate Pesticides |
| <input type="checkbox"/> _____ | <input type="checkbox"/> (767) Polychlorinated Biphenyls (PCB's) |
| <input type="checkbox"/> _____ | <input type="checkbox"/> (764) Polynuclear Aromatic Hydrocarbons |
| <input type="checkbox"/> _____ | <input type="checkbox"/> (762) SDWA Pesticides & Herbicides |

Remarks: _____

FIELD DATA:
 pH= 9.5; Conductivity= 220 umho/cm at 17°C; Chlorine Residual= _____ mg/l
 Dissolved Oxygen= _____ mg/l; Alkalinity= _____ mg/l; Flow Rate 175 gpm
 Depth to water _____ ft.; Depth of well _____ ft.; Perforation Interval _____ ft.; Casing: _____

Sampling Location, Methods and Remarks (i.e. odors, etc.)
Tesoro - Final oil-water separator outfall
to array. Some color, H₂S odor

I certify that the results in this block accurately reflect the results of my field analyses, observations and activities. (signature collector): [Signature] Method of Shipment to the Lab: static
 This form accompanies _____ Septum Vials, _____ Glass Jugs, and/or _____

- Samples were preserved as follows:
- NP: No Preservation; Sample stored at room temperature.
 - P-Ice: Sample stored in an ice bath (Not Frozen).
 - P-Na₂S₂O₃: Sample Preserved with Sodium Thiosulfate to remove chlorine residual.

CHAIN OF CUSTODY
 I certify that this sample was transferred from _____ to _____
 at (location) _____ on _____ - _____ and that
 the statements in this block are correct. Evidentiary Seals: Not Sealed Seals Intact: Yes No
 Signatures _____

ATTACHMENT VI

ORGANIC CHEMISTRY ANALYTICAL REQUEST FORM

SCIENTIFIC LABORATORY DIVISION
700 CAMINO DE SALUD N.E., ALBUQUERQUE, NM 87106
Organic Chemistry Section - Telephone: (505) 841-2570

SLD No. 1

Date Received: _____

Request ID No. 11111111
025137-C

Priority Code #: 3 (If "1" or "2", call EID-SLD Coordinator)

2 User Code #: 55321	3 Request ID No.: _____	6 County: McKinley	7 City: Hospih, NM	8 State: NM
5 Facility Name: American Exploration Co., Santa Fe RR Lease Tank Battery				

9 Sample Location: 17NO8E06.3433

10 Collected By: Chris S. HUEY On: 9210714 At: 1321 hrs.
First Last Date: (YY/MM/DD) Time: 24 hr. clock 3:00 pm = 1500 hrs.

11 Codes: Submitter _____ WSS # _____ Organization _____

12 Latitude (DDMMSS) _____ Longitude (DDMMSS) _____ 2 Digit ID (if needed) _____

13 Report To: Martha Rosenquist 14 Phone #: 505-473-3473

Address: N.M. ENVIRONMENT DEPT / GROUND WATER BUREAU
1911 FIFTH ST., SUITE 205

City, State Zip: SANTA FE, NM 87501

15 Sampling Information:
Sample Purpose: Grab Composite (Composite Time Period)
 Compliance Flow Proportioned
 Check Equal Aliquot
 Monitoring Sample Split w/Permittee
 Special Chain of Custody

16 Field Data: pH: 8.5, Conductivity: 2650 umhos @ _____ °C, Temperature: _____ °C, Residual: _____ mg/l, Flow: _____

17 Sample Source: Stream Well; Depth: _____
 Lake Spring
 Drain Distribution
 Pool Point-of-Entry
 WWTP Other: _____

18 Field Notes / Sample #: 9207141321; sample is from unnamed arroyo that is tributary to Sandoval Arroyo. This is oil field produced water discharged to unnamed arroyo from skimming pond at tank battery; sample collected ~150m downstream of discharge point.

19 Sample Type: Water, Soil, Food, Wastewater, Other

This form accompanies a single sample consisting of:
2 - septum vial(s) (volume = 40 ml)
_____ - glass jugs (volume = _____)
_____ (volume = _____)

20 Preservation: NB No Preservation; Sample stored at room temperature
 P-Ice Sample stored in an ice bath (Not Frozen)
 P-TS Sample Preserved with Sodium Thiosulfate to remove chlorine residual
 P-HCl Sample Preserved with Hydrochloric Acid (2 drops/40 ml)
 Other _____

21 Analyses Requested: Please check the appropriate box(es) below to indicate the type of analytical screen(s) required. Whenever possible, list specific compounds suspected or required.

Volatile Screens:

- (753) Aliphatic Headspace (1-5 Carbons)
- (754) Aromatic & Halogenated Purgeables (EPA 601 & 602)
- (765) Mass Spectrometer Purgeables (EPA 624)
- (766) SDWA Total Trihalomethanes (EPA 501.1)
- (774) SDWA VOC's I [8 Regulated +] (EPA 502.2)
- (775) SDWA VOC's II [EDB & DBCP] (EPA 504)

Other Specific Compounds or Classes:

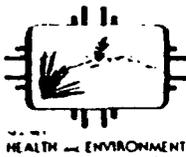
- () _____
- () _____
- () _____

Semivolatile Screens:

- (763) Acid Extractables
- (751) Aliphatic Hydrocarbons
- (755) Base/Neutral Extractables (EPA 625)
- (756) Base/Neutral/Acid Extractables (EPA 8270)
- (758) Herbicides, Chlorophenoxy Acid
- (759) Herbicides, Triazines
- (760) Organochlorine Pesticides
- (761) Organophosphate Pesticides
- (767) Polychlorinated Biphenyls (PCB's)
- (764) Polynuclear Aromatic Hydrocarbons
- (762) SDWA Pesticides & Herbicides

Remarks: Water fair results on 7/15/92: OVA reading > 100 ppm; NO₃ 1.8 mg/l; Fe 0.0 mg/l; SO₄ > 250 mg/l

ATTACHMENT IV



Environmental Improvement Division
Ground Water Bureau
Runnels Building
Santa Fe, New Mexico 87503
Ph: 827-2917

WATER WELL FIELD TEST

EXAMEN DE LA NORIA

3865

PRESS HARD - A PLANA CON FUERSA

FIELD SAMPLE ID # 9207141315

HOW TO TAKE A WATER SAMPLE

1. Turn on the tap and let the cold water run for at least five minutes.
2. Collect at least one quart of water in a washed, well rinsed, covered container such as a plastic milk jug or canning jar.
3. Old samples can give inaccurate results. Collect the sample as close to the time of testing as possible and write down the date and time you took the sample.

COMO TOMAR MUESTRAS DE NORIA

1. Abra la llave y deje que corra el agua fria cinco minutos a lo menos.
2. Recoja cuando menos un cuarto de agua en un envase lavado, bien enjuagado y tapado; puede ser un envase de plástico de leche o un frasco de envasar con tapa también.
3. Los resultados obtenidos de muestras que ya tengan tiempo, o viejas, pueden ser incorrectos.

WELL INFORMATION (1-18 to be completed by well owner or user.)

INFORMACION SOBRE LA NORIA (Debe de ser dada por el dueño (a) de la noria la persona que lo usa.)

Unnamed Arroyo Tributary
Unnamed Arroyo; Surface Water

1. Sampling date - Fecha de la muestra: *7-14-92*

2. Name - Nombre: *American Exploration Co.* Phone No. - Teléfono: _____

3. Mailing address - Dirección (para correspondencia): *Hobspah Oil Field, McKinley County, NM*
City, State, Zip code - Ciudad, Estado, Zona postal: *Star Rt. 2, Cuba, NM 87013*

4. Location of well (if different from mailing address) - Local de la noria (si es diferente a la anterior): *Surface water ~ 200m downstream from produced water discharge pipe at American Exploration Co. tank battery*

5. Well owner (if different from name above) - Dueño (a) de la noria (si es diferente al nombre dado anteriormente): _____

7. How many people use this well as a source of drinking water? - ¿Cuántas personas usan este noria de agua como recurso de agua potable?
No human use observed; livestock use observed

8. How long have they been using it? - ¿Cuánto tiempo tienen usándolo?
N/A

9. Concrete pad around the well? - ¿Plancha de concreto?
 YES - SI NO *N/A*

10. Distance from well to nearest septic system leachfield. - Distancia entre la noria del campo de lavado del sistema séptico mas cercano.
N/A

11. Well driller's name and address - Nombre y dirección de la persona que perforó la noria.
N/A

12. Suspected problems. - Problemas que se sospechan. *Oil sheen on surface of water, black oily staining, scum on banks of arroyo; heavy black oily sludges in sediments on bottom of arroyo*

13. Casing material - Cubierta: Steel - Acero PVC
N/A

14. Depth of well - Profundidad de la noria.
N/A

15. Depth to water - Profundidad del agua
N/A

16. Method of well construction. - Metodo de construcción:
 Drilled - Perforada Dug - Excavada Driven - Cavada
 Other - Please describe - Otro - Por favor describa:
N/A

17. Age of well (years) - Edad (años):
N/A

18. Are you using a water treatment unit? - ¿Esta Ud. usando un aparato especial para el purificar el agua?
 Yes - Si No
Check type: - Marque que tipo es:
 Distillation - Destilación
 Reverse osmosis - Osmosis inversa
 Chlorination - Tratamiento de cloro
 Carbon filter - Filtro de carbón
 Oxidation & removal - Oxidación y removimiento
 Water softener - Ablandador o suavizador de agua
*X Other - otro/Please describe:
Sedimentation and skimming in 2 pits prior to surface discharge*

LABORATORY RESULTS - RESULTADOS del LABORATORIO

pH	<i>8.5</i>	Temperature (degrees Centigrade)	
Conductivity (micromhos/cm) 1300 at 25° C †	<i>2650</i>	Organic vapor	<input type="checkbox"/> Not detected <input checked="" type="checkbox"/> Detected
Flame ionization (parts per million)	<i>7100 ppm</i>	Photo ionization (parts per million)	
Nitrate as N (mg/l) 10 mg/l †	<i>1.8</i>	Manganese (mg/l) 0.05 mg/l †	
Sulfate (mg/l) 250 mg/l †	<i>> 250</i>	Sulfide (mg/l) 0.05 mg/l †	
Iron (mg/l) 0.3 mg/l †	<i>0</i>		
Analyst - Analizador		Date - Fecha	

*Health standard †Aesthetic standard

COMMENTS - COMENTARIOS

AVISO

Los exámenes para tomar muestras de agua hechos por la oficina *Environmental Improvement Division* de Nuevo México (EID), son sóamente para analizar los productos químicos y características anotadas en esta forma, llamada en inglés, *Water Well Field Test*. Estos exámenes no deben considerarse un sustituto de un análisis completo de laboratorio, ni tampoco incluyen ningún análisis biológico (por ejemplo de bacteria, etc.). Además, si la manera en que fué tomada la muestra no fué la recomendada por EID, los resultados del examen de la muestra quizá den a conocer un componente o una característica que en realidad no se encuentra presente en su agua o quizá no den a conocer un componente o característica que sí esté presente. Si tiene usted alguna pregunta, por favor pregúntele a un representante de EID.

NOTICE

The water sample tests performed by the New Mexico Environmental Improvement Division (EID) are only for those chemicals or characteristics listed on the Water Well Field Test form. The tests are not a substitute for a complete laboratory analysis, nor do they include any biological (i.e., bacterial, etc.) analyses. In addition, the test results may show a compound or characteristic not actually present in your water, or may fail to show a compound or characteristic which is actually present, if the manner in which your water sample was taken and/or preserved is significantly different from the manner recommended by the EID. If you have any questions, please ask an EID representative.

This water testing program was made possible by special appropriations from the New Mexico Legislature. - Este programa para tomar muestras y analizar el agua se logró por la Legislatura de Nuevo México.

ATTACHMENT V



Environmental Improvement Division
Ground Water Bureau
Runnels Building
Santa Fe, New Mexico 87503
Ph: 827-2917

WATER WELL FIELD TEST

EXAMEN DE LA NORIA

3864

PRESS HARD-A PLANA CON FUERSA

SAMPLE FIELD # NO. 920714159

HOW TO TAKE A WATER SAMPLE

1. Turn on the tap and let the cold water run for at least five minutes.
2. Collect at least one quart of water in a washed, well rinsed, covered container such as a plastic milk jug or canning jar.
3. Old samples can give inaccurate results. Collect the sample as close to the time of testing as possible and write down the date and time you took the sample.

COMO TOMAR MUESTRAS DE NORIA

1. Abra la llave y deje que corra el agua fria cinco minutos a lo menos.
2. Recoja cuando menos un cuarto de agua en un envase lavado, bien enjuagado y tapado; puede ser un envase de plástico de leche o un frasco de envasar con tapa también.
3. Los resultados obtenidos de muestras que ya tengan tiempo, o viejas, pueden ser incorrectos.

WELL INFORMATION (1-18 to be completed by well owner or user.)

INFORMACION SOBRE LA NORIA (Debe de ser dada por el dueño (a) de la noria la persona que lo usa.) 17.8.6.4312 Mammuleta

1. Sampling date - Fecha de la muestra. 7-14-92	Field Test Location Hose at Tsosie residence from central community well
2. Name - Nombre ROBER & LENA	(NONE)
3. Mailing address - Dirección (para correspondencia). HCR # 79 BOX 100 Whitehorse Lake Chapter	
4. City, State, Zip code - Ciudad, Estado, Zona postal. Cuba, NM 87013	
5. Location of well (if different from mailing address) - Local de la noria (si es diferente a la anterior). McKinlay County; Hospah community 17.8.6.4312 (Home-site please descr.)	
6. Well owner (if different from name above) - Dueño (a) de la noria (si es diferente al nombre dado anteriormente). American Exploration Co.	
7. How many people use this well as a source of drinking water? - ¿Cuántas personas usan este noria de agua como recurso de agua potable? at least 6 in Tsosie family; others at AEC	
8. How long have they been using it? - ¿Cuánto tiempo tienen usándolo? at least 15 yrs.	
9. Concrete pad around the well? - ¿Plancha de concreto? <input type="checkbox"/> YES - SI <input type="checkbox"/> NO UNK.	
10. Distance from well to nearest septic system leachfield. - Distancia entre la noria del campo de lavado del sistema séptico más cercano. outhouse only; no septic tank system	

11. Well driller's name and address - Nombre y dirección de la persona que perforó. American Exploration Co. Donnie Hill Star Rte. #2 Regional Supt. Cuba, NM 87013 394-2508
12. Suspected problems - Problemas que se sospechan: <input type="checkbox"/> None - Ninguno Describe: - Describe: clear, no odors when sample collected from hose at home; homeowner reports oily film on surface of water after it has sit in a water barrel inside the home.
13. Casing material - Cubierta. UNK. <input type="checkbox"/> Steel - Acero <input type="checkbox"/> PVC
14. Depth of well - Profundidad de la noria. UNK.
15. Depth to water - Profundidad del agua. UNK.
16. Method of well construction - Método de construcción: <input checked="" type="checkbox"/> Drilled - Perforada <input type="checkbox"/> Dug - Excavada <input type="checkbox"/> Driven - Cavada <input type="checkbox"/> Other - Please describe - Otro - Por favor describa.
17. Age of well (years) - Edad (años) UNK.
18. Are you using a water treatment unit? - ¿Está Ud. usando un aparato especial para el purificar el agua? <input type="checkbox"/> Yes - SI <input checked="" type="checkbox"/> No Check type: - Marque que tipo es: <input type="checkbox"/> Distillation - Destilación <input type="checkbox"/> Other - otro/Please describe - Por favor describe: <input type="checkbox"/> Reverse osmosis - Osmosis inversa <input type="checkbox"/> Chlorination - Tratamiento de cloro <input type="checkbox"/> Carbon filter - Filtro de carbón <input type="checkbox"/> Oxidation & removal - Oxidación y removimiento <input type="checkbox"/> Water softener - Ablandador o suavizador de agua

LABORATORY RESULTS - RESULTADOS del LABORATORIO

pH 8.5	Temperature (degrees Centigrade)
Conductivity (micromhos/cm) 1300 at 25° C †	1000
Organic vapor	<input checked="" type="checkbox"/> Not detected <input type="checkbox"/> Detected
Flame ionization (parts per million)	
Photo ionization (parts per million)	
Nitrate as N (mg/l) 10 mg/l †	Manganese (mg/l) 0.05 mg/l †
Sulfate (mg/l) 250 mg/l †	Sulfide (mg/l) 0.05 mg/l †
Iron (mg/l) 0.3 mg/l †	
Analyst - Analizador	Date - Fecha

*Health standard †Aesthetic standard

COMMENTS - COMENTARIOS

Please read the back of this form. - Por favor lea al reverso de esta forma.

*Family uses this water for drinking purposes only in an emergency; uses water for cooking, bathing, cleaning, livestock

Los exámenes para tomar muestras de agua hechos por la oficina Environmental Improvement Division de Nuevo México (EID), son solamente para analizar los productos químicos y características anotadas en esta forma, llamada en inglés, Water Well Field Test. Estos exámenes no deben considerarse un sustituto de un análisis completo de laboratorio, ni tampoco incluyen ningún análisis biológico (por ejemplo de bacteria, etc.). Además, si la manera en que fue tomada la muestra no fue la recomendada por EID, los resultados del examen de la muestra quizá den a conocer un componente o una característica que en realidad no se encuentra presente en su agua o quizá no den a conocer un componente o característica que sí esté presente. Si tiene usted alguna pregunta, por favor pregúntele a un representante de EID.

NOTICE

The water sample tests performed by the New Mexico Environmental Improvement Division (EID) are only for those chemicals or characteristics listed on the Water Well Field Test form. The tests are not a substitute for a complete laboratory analysis, nor do they include any biological (i.e., bacterial, etc.) analyses. In addition, the test results may show a compound or characteristic not actually present in your water, or may fail to show a compound or characteristic which is actually present, if the manner in which your water sample was taken and/or preserved is significantly different from the manner recommended by the EID. If you have any questions, please ask an EID representative.

This water testing program was made possible by special appropriations from the New Mexico Legislature. - Este programa para tomar muestras y analizar el agua se logró por la Legislatura de Nuevo México.

505-393-0120

711-01-0012 Expansion

District I
1635 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Alameda, NM 88210
District III
1000 Rio Brazos Road, Artes, NM 87410
District IV
1320 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-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 checked="" type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> <i>NON EXEMPT myk</i>		4. Generator <i>Genex of Texas</i>
Verbal Approval Received: Yes <input type="checkbox"/> No <input type="checkbox"/>		5. Originating Site <i>Odessa TX</i>
2. Management Facility Destination <i>C+C Landfarm Inc</i>		6. Transporter <i>Environmental Technology</i>
3. Address of Facility Operator <i>Monument NM</i>		8. State <i>Texas</i>
7. Location of Material (Street Address or ULSRJ) <i>8313 + W. Loop 338 Odessa, TX.</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:

Soil Contaminated with Crude oil + b5+W mixture. Approx 70 Fluid bbls in 400-500 yds. of soil.

Estimated Volume 500 cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE *Jim Cooper* TITLE: *President* DATE: *6-4-02*

TYPE OR PRINT NAME: *Jim Cooper* TELEPHONE NO. *505-369-7108*

*06/20/02
06/20/02*

APPROVED BY: *[Signature]* TITLE: *Environmental Technology*



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Betty Rivera
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

FAX

TO: MARYNE KEELING

FROM: LADEN
Energy Minerals and Natural Resources Department,
Oil Conservation Division

RE: _____

DATE: 6/11/02

THIS IS CRUDE CONTAMINATED TEXAS SOIL FROM A TRUCKET
TRUCK INVOLVED IN ACCIDENT, ANALYSIS IS ON THE WAY.

3 Pages (Including Transmittal)



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Betty Rivera
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

FAX

TO: MARTINE KIELING

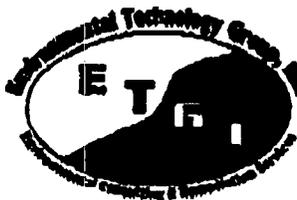
FROM: LARRY JOHNSON
Energy Minerals and Natural Resources Department,
Oil Conservation Division

RE: JENEX SAMPLES

DATE: 6/12/02

C-138 SUBMITTAL BY JENEX - HWY SPILL IN
ODESSA TX - PRODUCT IS ON PLASTIC BESIDE THE
ROADWAY & OFFICIALS ARE NERVOUS.

8 Pages (Including Transmittal)



ENVIRONMENTAL TECHNOLOGY GROUP, INC.
P.O. BOX 4845
MIDLAND, TX 79704
OFFICE 915/522-1139
FAX 915/520-4310

FACSIMILE TRANSMITTAL

DATE: 6/11/02

TO: Mr. Larry Johnson

FROM: Chance Johnson

RE:

FAX NO.: 1-505-393-0720

NUMBER OF PAGES: 7 (INCLUDING THIS COVERSHEET)

COMMENTS: Mr. Johnson -

3PS + 3PN are "stockpile" samples

If you have any questions please call
Chance Johnson @ 522-1139 or 238-4055.

The information in this Facsimile message is privileged and confidential information intended only for the use of the addressee. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination, distribution, or copying to this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and please return the original message to us at the above address via U. S. Postal Service. Thank you.

ANALYTICAL REPORT

Prepared for:

**CHANCE JOHNSON
E.T.G.I.
P.O. BOX 4845
MIDLAND, TX 79704**

**Project: Jenex
Order#: G0203370
Report Date: 05/17/2002**

**Certificate
US EPA Laboratory Code TX00158**

ENVIRONMENTAL LAB OF TEXAS I, LTD. 12600 West I-20 East, Odessa, TX 79765 Ph: 915-563-1800

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

CRANCE JOHNSON
E.T.O.L
P.O. BOX 4845
MIDLAND, TX 79704

Order#: G020370
Project: JEN 1102R
Project Name: Jones
Location: Odessa

Lab ID: 020370-05
Sample ID: SPS

TCLP BTEX 8021B,1311

Method Blank Date Prepared Date Analyzed Sample Amount Dilution Factor Analyte Method
0001749-02 5/17/02 5/18/02 1 1 CK 1311/8021B

Parameter	Result µg/L	RL
Benzene	33.4	1.00
Ethylbenzene	497	1.00
Toluene	361	1.00
p/m-Xylene	479	1.00
o-Xylene	252	1.00

Lab ID: 020370-06
Sample ID: SPN

TCLP BTEX 8021B,1311

Method Blank Date Prepared Date Analyzed Sample Amount Dilution Factor Analyte Method
0001749-02 5/17/02 5/18/02 1 1 CK 1311/8021B

Parameter	Result µg/L	RL
Benzene	67.9	1.00
Ethylbenzene	626	1.00
Toluene	531	1.00
p/m-Xylene	594	1.00
o-Xylene	312	1.00

Approved: *Roland K. Tuttle* 5-20-02
Roland K. Tuttle, Lab Director, QA Officer
Cecy D. Keene, Org. Tech. Director
Jeanne McMurray, Inorg. Tech. Director
Sandra Blazynko, Lab Tech.
Sara Molina, Lab Tech.

DL - Diluted out N/A - Not Applicable RL - Reporting Limit

Page 1 of 1

ENVIRONMENTAL LAB OF TEXAS I, LTD. 12600 West 1-20 East, Odessa, TX 79765 Ph: 915-563-1800

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

CHANCE JOHNSON
 E.T.G.L.
 P.O. BOX 4845
 MIDLAND, TX 79704

Order# 0203378
 Project: JEN 1102R
 Project Name: Jones
 Location: Odessa

Lab ID: 0203378-04
 Sample ID: EEB #1

3021R/3030 BTEX

Method	Date	Date	Sample	Dilution	Analyst	Method
Blank	Prepared	Analyzed	Amount	Factor	CK	1008
0001736-03		5/16/02	1	25	CK	3021R
		11:05				

Parameter	Result	RL
Benzene	<25.0	25.0
Ethylbenzene	<25.0	25.0
Toluene	33.6	25.0
p/m-Xylene	58.0	25.0
o-Xylene	<25.0	25.0

Lab ID: 0203378-05
 Sample ID: SP8

1005 TNRCC Rev 03

Method	Date	Date	Sample	Dilution	Analyst	Method
Blank	Prepared	Analyzed	Amount	Factor	CK	1008
		5/16/02	1	10	CK	1008

Parameter	Result	RL
GRQ, >C12-C15	9468	250
GRQ, C6-C12	5670	250
TOTAL, C6-C15	11034	250

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

Page 4 of 10

ENVIRONMENTAL LAB OF TEXAS, LTD 12600 West Loop East, Odessa, TX 79765 Ph: 915-863-1800

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

CHANCE JOHNSON
E.T.G.L.
P.O. BOX 4645
MIDLAND, TX 79704

Order# G0901978
Project# JEN 1102R
Project Name# Jones
Location# Odessa

Lab ID: 0203370-03
Sample ID: SP5

Total

1021B/5030 BTEX

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyte	Method
0001736-03		5/16/02 17:38	1	100	CK	8031B

Parameter	Result mg/kg	RL
Benzene	3900	100
Ethylbenzene	97000	100
Toluene	17500	100
m-Xylene	39000	100
p-Xylene	18600	100

2.8

Lab ID: 0203370-06
Sample ID: SPN

1005 INRCC Rev 03

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyte	Method
		5/16/02	1	10	CK	1005

Parameter	Result mg/kg	RL
ORO, C12-C15	5678	250
ORO, C6-C12	5990	250
TOTAL, C6-C15	11668	250

DL - Diluted out N/A - Not Applicable RL - Reporting Limit

Page 6 of 10

ENVIRONMENTAL LAB OF TEXAS I, LTD. 12600 West I-20 East, Odessa, TX 79769 Ph: 915-563-1800

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

CHANCE JOHNSON
 E.T.G.I
 P.O. BOX 4845
 MIDLAND, TX 79704

Order#: 6203370
 Project: JEN 1181R
 Project Name: Juncs
 Location: Orens

Lab ID: 6203370-06
 Sample ID: 8PN

5021B/5030 BTEX Total

Method <u>Blank</u>	Date <u>Prepared</u>	Date <u>Analyzed</u>	Sample <u>Amount</u>	Dilution <u>Factor</u>	Analyte	Method
8001726-03		5/16/02 17:51	1	100	CK	8021B

Parameter	Result µg/g	RL
Decane	3620	100
Benzene	4300	100
Toluene	3090	100
p/m-Xylene	4540	100
o-Xylene	2120	100

3.6 PPN

Lab ID: 6203370-07
 Sample ID: WEB #1

1005 INRCC Rev 03

Method <u>Blank</u>	Date <u>Prepared</u>	Date <u>Analyzed</u>	Sample <u>Amount</u>	Dilution <u>Factor</u>	Analyte	Method
		5/16/02	1	1	CK	1005

Parameter	Result µg/g	RL
DRO, >C12-C15	43.3	25.0
GRO, C6-C12	<25.0	25.0
TOTAL, C6-C15	43.3	25.0

DL = Dotted out N/A = Not Applicable RI = Reporting Limit

ANALYTICAL REPORT

Prepared for:

CHANCE JOHNSON
E.T.G.I.
P.O. BOX 4845
MIDLAND, TX 79704

Project: Jenex
Order#: G0203370
Report Date: 05/17/2002

Certificates

US EPA Laboratory Code TX00158

ENVIRONMENTAL LAB OF TEXAS I, LTD. 12600 West I-20 East, Odessa, TX 79765 Ph: 915-563-1800

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

CRANCE JOHNSON
E.T.G.L.
P.O. BOX 4845
MIDLAND, TX 79704

Order#: G020370
Project: JEN 1102R
Project Name: Jones
Location: Odessa

Lab ID: 020370-06
Sample ID: SPN

TCLP BTEX 8021B,1311

Method	Date	Date	Sample	Dilution	Analyst	Method
Blank	Prepared	Analyzed	Amount	Factor		
0001749-02	5/17/02	5/18/02	1	1	CK	1311/8021B
		14:06				

Parameter	Result µg/L	RL
Benzene	33.4	1.00
Ethylbenzene	497	1.00
Toluene	361	1.00
p/m-Xylene	479	1.00
o-Xylene	252	1.00

Lab ID: 020370-06
Sample ID: SPN

TCLP BTEX 8021B,1311

Method	Date	Date	Sample	Dilution	Analyst	Method
Blank	Prepared	Analyzed	Amount	Factor		
0001749-02	5/17/02	5/18/02	1	1	CK	1311/8021B
		14:06				

Parameter	Result µg/L	RL
Benzene	67.9	1.00
Ethylbenzene	626	1.00
Toluene	531	1.00
p/m-Xylene	594	1.00
o-Xylene	312	1.00

Approved: Roland K. Tuttle 5-20-02
 Roland K. Tuttle, Lab Director, QA Officer
 Coley D. Keene, Org. Tech. Director
 Jeanne McMurray, Insp. Tech. Director
 Sandra Blumhagen, Lab Tech.
 Sara Molina, Lab Tech.

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

Page 1 of 1

ENVIRONMENTAL LAB OF TEXAS, LTD. 12600 West I-20 East, Odessa, TX 79768 Ph: 915-563-1800

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

CHANCE JOHNSON
 C.T.C.I.
 P.O. BOX 4846
 MIDLAND, TX 79704

Order#: 0303378
 Project: JEN 1182R
 Project Name: Jenvex
 Location: Odessa

Lab ID: 0303378-04
 Sample ID: EKB #1

1021R/5030 BTEX

Method Blank	Date Received	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
0001736-02		6/14/02 17:06	1	25	CK	8021R

Parameter	Result mg/kg	RL
Benzene	<25.0	25.0
Ethylbenzene	<25.0	25.0
Toluene	33.6	25.0
p/m-Xylene	39.0	25.0
o-Xylene	<25.0	25.0

Lab ID: 0303378-05
 Sample ID: SP5

1005 TNRCC Rev 03

Method Blank	Date Received	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
		5/16/02	1	10	CK	1005

Parameter	Result mg/kg	RL
ORO, >C12-C15	5460	250
ORO, C6-C12	3670	250
TOTAL, C6-C15	11030	250

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

Page 6 of 10

ENVIRONMENTAL LAB OF TEXAS I, L.P.A. 13400 West 138 East, Odessa, TX 79763 Ph: 915-863-1800

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

CHANCE JOHNSON
 E.T.G.L
 P.O. BOX 4845
 MIDLAND, TX 79704

Order# 00003570
 Project JEN 1182R
 Project Name: Jones
 Location: Odessa

Lab ID: 0203370-03
 Sample ID: 8FS

1031E/5030 BTEX

Method <u>Blank</u>	Date <u>Prepared</u>	Date <u>Analysed</u>	Sample <u>Amount</u>	Dilution <u>Factor</u>	Analyte	Method
0801706-03		8/16/02 11:28	1	100	CCK	8031E

Parameter	Result µg/m ³	RL
Benzene	2500	100
Ethylbenzene	37000	100
Toluene	17500	100
m/p-Xylene	35000	100
o-Xylene	18000	100

Lab ID: 0203370-06
 Sample ID: 8FN

1005 TNRCC Rev 03

Method <u>Blank</u>	Date <u>Prepared</u>	Date <u>Analysed</u>	Sample <u>Amount</u>	Dilution <u>Factor</u>	Analyte	Method
		9/16/02	1	10	CCK	1005

Parameter	Result µg/m ³	RL
DRO, >C12-C33	5678	250
ORO, C8-C12	5970	250
TOTAL, C8-C33	11660	250

DL = Detected not N/A = Not Applicable RL = Reporting Limit

Page 6 of 10

ENVIRONMENTAL LAB OF TEXAS I, L.P.A. 12500 West I-20 East, Odessa, TX 79765 Ph: 915-663-1800

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

CHANCE JOHNSON
E.T.G.L.
P.O. BOX 6845
MIDLAND, TX 79704

Order#: G203370
Project: JEN 1102R
Project Name: Jentz
Location: Odessa

Lab ID: G203370-06
Sample ID: SP74

0021B/5030 BTEX

<u>Method</u> <u>Blank</u>	<u>Date</u> <u>Prepared</u>	<u>Date</u> <u>Analyzed</u>	<u>Sample</u> <u>Amount</u>	<u>Dilution</u> <u>Factor</u>	<u>Analyst</u>	<u>Method</u>
0001736-02		5/16/02 17:53	1	100	CK	0021B

Parameter	Result µg/g	RL

6



HOSPAN 8/5/92

Lake Sandoval



HOSPAN

8/5/92

Outlet pipes on down stream
side of Lake Sandoval.



HOSPAN 8/5/92

Arroyo on downstream side
of outlet from Lake Sandoval



TESORO

PETROLEUM CORP.

FIELD
OFFICE

MIDLAND, TEXAS

Tesoro - Hospah 4/19/88



Tesoro - Hospak

4/19/88



Hospaly

4/19/88



HOSPAAH 8/5/92

Unlined pond @ tank battery



HOSPAN 8/5/92

Unlined pond @ tank battery



HOSPAN 8/5/92

Discharge pipe from unlined
pond @ tank battery



HOSPAAH 8/5/92

Discharge pipe from unlined
pond @ tank battery



HOSPATT 8/5/92

Unlined pond @ tank battery



HOSPAN 8/5/92

Unlined pond @ tank battery



HOSPAN 8/5/92

Unlined pond @ tank
battery



Hospah

Discharge pipe from unlined
pond @ tank battery

8/5/92



HOSPANH 8/5/92

Drainage ditch between
unlined ponds & Lake Sandaval



HOSPAN

8/5/92

...

Drainage ditch between
unlined ponds & Lake Sandoval



HOSPATA 8/5/92

Drainage ditch from unlined
pond (Santa FERR Battery).



HOSPAN 8/5/92

Drainage ditch from unlined
pond @ Santa Fe Tank Battery
(Sediment sample taken).



HOSPANA 8/5/92

Navajo home @ Hospah oil field



HOSPAN

8/5/92

1992 08 05





HOSPAN 8/5/92

Final Skim pond

15 550



HOSPRAH 8/5/92

10 FEB

Final Skim pond



HOSPAN 8/5/92

Arroyo-outlet below final
skim.



HOSPAAH 8/5/92

1000000000

Arroyo below final skim.

Sample location (soil + water)



HOSPAN 8/5/92

Lake Sandoval



HOSPITAL 8/5/92

Lake Sandoval - looking
up stream



HOSPAN 8/5/92

Lake Sandoval