

1R - 299

REPORTS

DATE:

2001

February 19, 2001

Mr. Chris Williams
Oil Conservation Division
New Mexico Energy, Minerals & Natural Resources Department
1625 North French Drive
Hobbs, New Mexico 88240

RE: Cleanup Criteria/Additional Workplan
Equilon Pipeline Company
Penrose "A" Lease
Southeast Eunice, Lea County, New Mexico

Dear Mr. Williams:

On July 26, 2000, Equiva Services LLC submitted to your office a workplan detailing the cleanup goals at the above referenced site. The workplan detailed how closure values for the site were determined based upon the New Mexico Oil Conservation Division (NMOCD) ranking criteria. Closure values for the site were determined to be 1,000 milligrams per kilograms (mg/Kg) above background for total petroleum hydrocarbons (TPH), 50 mg/Kg for total benzene, toluene, ethylbenzene, and xylenes (BTEX), and 10 mg/Kg for benzene based upon the depth to groundwater at the site (approximately 70 feet below ground surface).

In order to meet the NMOCD criteria, extensive excavation has been performed at the site over the past month. At present, the site has been excavated to a depth of 40 feet below ground surface (bgs). Despite this intense remedial effort, hydrocarbon odors and staining are still evident at the bottom of the excavation with TPH concentrations of 5,480 mg/Kg (EPA Method 8015M). Maximum BTEX concentration is 24.60 mg/Kg, with no benzene detected, which is within closure criteria for benzene and total BTEX.

A Synthetic Precipitation Leaching Potential (SPLP) TPH, which measures the amount of TPH capable of being leached from the soil by precipitation and groundwater, was analyzed for soil samples at depths of 30 and 40 feet bgs. The results showed a marked decrease with depth (26.64 milligrams per Liter (mg/L) at 30 feet bgs to 9.01 mg/L at 40 feet bgs). See attached Table 1.

Since there are no toxicological values for TPH, *per se*, Equiva has requested that the soil samples from the base of the excavation also be analyzed for polycyclic aromatic hydrocarbons (PAHs) and SPLP volatile organic compounds (VOCs). This additional analysis was performed in an attempt to determine if individual TPH constituents were present in the remaining soil of the excavation in sufficient quantities to present a threat to human health or the environment. Laboratory analytical results are presented in Attachment A.

The attached Table 2 presents the results of additional laboratory analysis performed onsite for the sample at 40 feet bgs. Comparisons are presented between observed concentrations and USEPA Primary Drinking Water Standards, New Mexico WQCC Groundwater Standards, and Texas Natural Resource Conservation Commission (TNRCC) Permissible Contaminant Levels (PCLs) for Tier 1, Residential, Class 1 Groundwater.

As presented in Table 2, the **soil** concentrations of the contaminants of concern (COC) observed in the samples are all **below the MCLs or PCLs for Drinking Water**, where such MCls or PCLs have been determined or are available. Notice that, in addition, SPLP TPH concentrations, which measure the mobile TPH fractions that are capable of being leached by precipitation and groundwater, have decreased with depth (26.64 mg/L at 30 feet bgs to 9.01 mg/L at 40 feet bgs). USEPA Primary Drinking Water Standards, New Mexico WQCC Ground Water Standards, and TNRCC PCLs for Tier 1, Class 1 Groundwater are presented in Attachment B.

The New Mexico Water Quality Control Commission has not established standards for soil concentrations determined to be protective of groundwater. However, the TNRCC, in their recently published Texas Risk Reduction Program (TRPP) has determined groundwater protective soil concentrations for the contaminants observed at this site. The attached Table 3 presents Tier 1, Class 1 Groundwater PCLs for Residential and Commercial/Industrial Facilities:

As presented in Table 3, TNRCC Tier 1, Class 1 groundwater protective soil concentrations for the COCs are a minimum of two orders of magnitude **greater** than the observed concentrations. TNRCC Tier 1 Soil PCLs are presented in Attachment B.

In light of the above information and depth of excavation, Equiva Services LLC respectfully requests that the New Mexico OCD concur with our assessment that the crude oil spill at the Penrose "A" Lease located in Lea County, New Mexico has been remediated to the point that the remaining contaminant levels do not present a threat to human health or the environment. In order to ensure that the remaining in place hydrocarbon impacted soil will not leach to the surrounding groundwater, Equiva proposes placing three feet of impervious clay at the bottom of the excavation. The remainder of the excavation will be backfilled with clean soils and brought up to grade. Upon completing the backfilling of the excavation, Equiva proposes installing a monitoring well through the center of the excavation to determine if the release has impacted groundwater. If groundwater has been impacted above regulatory limits, Equiva will work with your office and the landowner to reach a satisfactory remedy to the impact. Equiva Services appreciates any input the NMOCD has on this matter.



Thank you for your assistance and cooperation. If you have any questions or comments, please do not hesitate to call me at (281) 252-6917.

Sincerely
EQUIVA SERVICES LLC

Kyle Landreneau
Environmental Geologist
SHE/Science & Engineering

"Equiva Services LLC provides miscellaneous services, including environmental services, on behalf of its owners Motiva Enterprises LLC and Equilon Enterprises LLC, and on behalf of, Shell Oil Company, Star Enterprise and Texaco Inc."

Cc: Wayne Price-NMOCD Santa Fe
Roger Anderson-NMOCD Santa Fe
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

Jeffrey Kindley – Enercon Services, Inc
306 West Wall
Suite 1312
Midland Texas 79701

Leo Sims S&D Ranch Environmental Representative
814 West Marland Blvd.
Hobbs New Mexico 88240

TABLE 1
SOIL ANALYTICAL RESULTS
EQUIVA PENROSE EXCAVATION SITE
LEA COUNTY, NEW MEXICO

Sample Location	Date	Benzene (in mg/kg)	Toluene (in mg/kg)	Ethylbenzene (in mg/kg)	Xylenes (in mg/kg)	Total BTEX (in mg/kg)	TPH-Dro (in mg/kg)	TPH-Gro (in mg/kg)	TPH-Total (in mg/kg)	SPLP-TPH (in mg/L)
Southwall 15'	11/09/00	<0.05	<0.05	<0.05	<0.05	<0.05	65	<5.0	65	NS
Westwall 15'	11/09/00	<0.05	<0.05	<0.05	<0.05	<0.05	<50	<5.0	<50	NS
Eastwall 15'	11/09/00	<0.05	<0.05	<0.05	<0.05	<0.05	<50	<5.0	<50	NS
Northwall 15'	11/09/00	<0.05	<0.05	<0.05	<0.05	<0.05	<50	<5.0	<50	NS
Bottom 20'	11/09/00	<0.05	2.11	9.95	8.63	20.7	2,699	341	3,040*	NS
Bottom 30'	11/14/00	<0.05	<0.005	3.43	5.72	9.15	1,330	4,510	5,840*	26.64
Bottom 40'	11/17/00	<0.020	<0.020	8.50	16.10	24.60	1,580	3,900	5,480*	9.01
NMOCD Rankings	10	NA	NA	NA	NA	NA	NA	NA	1,000	NA

ND = Not detected

NS = Not sampled

NA = Not available

*Exceeds current NMOCD standards.

TABLE 2
OBSERVED SOIL CONCENTRATIONS vs. GROUNDWATER STANDARDS
EQUIVA PENROSE EXCAVATION SITE
LEA COUNTY, NEW MEXICO

Bottom Sample 40 foot depth	Observed Concentration (in mg/Kg)	USEPA Primary Drinking Water Standards (in mg/L)	New Mexico WQCC	TNRCC Permissible Contaminant Levels (in mg/Kg)
			Groundwater Standards (in mg/L)	
TPH				
DRO	1,580	NA	NA	NA
GRO	3,900	NA	NA	NA
SPLP TPH	9.01	NA	NA	NA
VOLATILES (VOCs)				
Naphthalene	0.1260	NA	NA	0.490
Isopropylbenzene	0.0593	NA	NA	NA
n-Propylbenzene	0.0926	NA	NA	NA*
1,3,5-Trimethylbenzene*	0.5420	NA	NA	NA*
1,2,4-Trimethylbenzene*	0.4250	NA	NA	NA*
sec-Butylbenzene	0.3510	NA	NA	NA
p-Isopropyltoluene	0.3590	NA	NA	NA
n-Butylbenzene	0.4440	NA	NA	NA
Total Xylenes	0.0853	10.0	NA	10.0
Polycyclic Aromatic Hydrocarbons (PAHs)	ND	NA	NA	NA
NA-Not available				
*PCCLs for 1,2,4- and 1,3, 5 Trimethylbenzene are undetermined; however a PCCL of 1,000 mg/Kg has been determined for 1,2, 3 Trimethylbenzene				
ND-Not detected				

TABLE 3

**OBSERVED SOIL CONCENTRATIONS vs. TNRCC GROUNDWATER PROTECTIVE SOIL CONCENTRATIONS
(RESIDENTIAL AND COMMERCIAL/INDUSTRIAL)**
EQUIVA PENROSE EXCAVATION SITE
LEA COUNTY, NEW MEXICO

Contaminant	Observed Concentration (in mg/Kg)	Groundwater Protective PCL Residential (in mg/Kg)	Groundwater Protective PCL Commercial/Industrial (in mg/Kg)
Naphthalene	0.1260	31.00	93.00
Isopropylbenzene	0.0593	NA	NA
n-Propylbenzene	0.0926	NA	NA
1,3,5-Trimethylbenzene	0.5420	NA	NA
1,2,4-Trimethylbenzene	0.4250	NA	NA
sec-Butylbenzene	0.3510	NA	NA
p-Isopropyltoluene	0.3590	NA	NA
n-Butylbenzene	0.4440	NA	NA
Total Xylenes	0.0853	120.00	120.00
NA-Not available			
* PCLs for 1,2,4- and 1,3, 5 Trimethylbenzene are undetermined; however a PCL of 26.00 mg/Kg has been determined for 1,2, 3 Trimethylbenzene			



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

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

ANALYTICAL RESULTS FOR
ENERCON SERVICES
ATTN: JEFF KINDELY
306 W. WALL, SUITE 1312
MIDLAND, TX 79701
FAX TO: (915) 631-6591

Receiving Date: 11/14/00
Reporting Date: 11/16/00
Project Number: ES-533 (EQUIVON SERVICES)
Project Name: PENROSE
Project Location: EUNICE, NM

Sampling Date: 11/14/00
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: AH
Analyzed By: BC

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLEMES (mg/Kg)
ANALYSIS DATE:		11/14/00	11/14/00	11/15/00	11/15/00	11/15/00	11/15/00
H5344-1	BOTTOM 30'	1330	4510	<0.005	<0.005	3.43	5.72
Quality Control		787	804	0.094	0.095	0.087	0.266
True Value QC		800	800	0.100	0.100	0.100	0.300
% Recovery		98.3	100	93.8	94.7	87.2	88.6
Relative Percent Difference		7.7	0.9	1.4	3.8	0.5	2.8

METHODS: TPH GRO & DRO - EPASW-846 8015 M; BTEX - SW-846 8260.

Burgess J. A. Cooke, Ph. D.

11/16/00

Date

H5344.XLS

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ANALYTICAL RESULTS FOR
ENERCON SERVICES
ATTN: JEFF KINDLEY
306 W. WALL, SUITE 1312
MIDLAND, TX 79701
FAX TO: (915) 684-7587

Receiving Date: 11/14/00

Sampling Date: 11/14/00

Reporting Date: 11/21/00

Sample Type: SOIL

Project Number: ES-533 (EQUIVON SERVICES)

Sample Condition: COOL & INTACT

Project Name: PENROSE

Sample Received By: AH

Project Location: EUNICE, NM

Analyzed By: BC

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/L)	DRO (>C ₁₀ -C ₂₈) (mg/L)
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ANALYSIS DATE:		11/18/00	11/18/00
H5344-1	BOTTOM 30'	5.24	21.4
Quality Control		9.32	10.8
True Value QC		10.0	10.0
% Recovery		93.2	108
Relative Percent Difference		11.3	2.3

METHOD: SW-846 1312, 8015 M

Sue Estelle Cook
Chemist

11/21/00
Date

H5344T.XLS

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LABORATORIES

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

ANALYTICAL RESULTS FOR
ENERCON SERVICES, INC.
ATTN: JEFFREY KINDLEY
306 W. WALL, STE. 1312
MIDLAND, TX 79701
FAX TO: (915) 684-7587

Receiving Date: 11/17/00
Reporting Date: 12/04/00
Project Number: ES-533
Project Name: PENROSE
Project Location: EUNICE, LEA COUNTY, NM

Analysis Date: 12/01/00
Sampling Date: 11/17/00
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: AH
Analyzed By: AH

LAB NUMBER	SAMPLE ID	Cl ⁻ (mg/Kg)
H5359-1	BOTTOM 40'	66
Quality Control		1025
True Value QC		1000
% Recovery		103
Relative Percent Difference		4.1

METHOD: Standard Methods 4500-Cl'B

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

Sayl R. Blane
Chemist

12/04/2000
Date

H5359C.XLS

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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST



CARDINAL LABORATORIES, INC.

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

ANALYSIS REQUEST																																										
BILL TO:																																										
Company Name:	Freelon Services Inc.																																									
Project Manager:	Jeffrey Kindley																																									
Address:	306 West Walk Suite 1312																																									
City:	Midland																																									
Phone #	(915) 570-8726																																									
Project #:	ES-533																																									
Project Name:	Penrose																																									
Project Location:	Eunice, Lee County, New Mexico																																									
Sampler Name:	Jeffrey Kindley																																									
SPLP TPH 1312																																										
FOR LAB USE ONLY																																										
Lab I.D.	Sample I.D.																																									
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 15%;">MATRIX</th> <th style="width: 15%;">PRESERVY</th> <th style="width: 15%;">SAMPLING</th> <th style="width: 15%;">TIME</th> <th style="width: 15%;">DATE</th> <th style="width: 15%;">OTHER:</th> <th style="width: 15%;">ACID/BASE</th> <th style="width: 15%;">ICE / COOL</th> <th style="width: 15%;">SLUDGE</th> <th style="width: 15%;">CRUDE OIL</th> <th style="width: 15%;">SOIL</th> <th style="width: 15%;"># CONTAINERS</th> <th style="width: 15%;">GROUNDWATER</th> <th style="width: 15%;">WASTEWATER</th> <th style="width: 15%;">OTHER:</th> </tr> </thead> <tbody> <tr> <td>15351- Bottom</td> <td>4D'</td> <td>C</td> <td>✓</td> <td>11/16/00</td> <td>1400</td> <td>✓</td> <td></td> <td></td> <td></td> <td></td> <td>2</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>												MATRIX	PRESERVY	SAMPLING	TIME	DATE	OTHER:	ACID/BASE	ICE / COOL	SLUDGE	CRUDE OIL	SOIL	# CONTAINERS	GROUNDWATER	WASTEWATER	OTHER:	15351- Bottom	4D'	C	✓	11/16/00	1400	✓					2				
MATRIX	PRESERVY	SAMPLING	TIME	DATE	OTHER:	ACID/BASE	ICE / COOL	SLUDGE	CRUDE OIL	SOIL	# CONTAINERS	GROUNDWATER	WASTEWATER	OTHER:																												
15351- Bottom	4D'	C	✓	11/16/00	1400	✓					2																															
<small>PLEASE NOTE: Cardinal's liability and client's deductible remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the services. All claims involving those for negligence and any other cause whatever shall be deemed waived unless made in writing and received by Cardinal within 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 subcontractors, claimants 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.</small>																																										
Sampler Relinquished:	<small>Received By: (Lab Staff)</small> Jeffrey Kindley <small>Date: 11/17/00 Time: 1500</small>																																									
Delivered By: (Circle One)	<input checked="" type="checkbox"/> UPS - Bus - Other: <input checked="" type="checkbox"/> UPS																																									
<small>Phone Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Add'l Phone #: _____ Fax Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Add'l Fax #: _____</small>																																										
<small>REMARKS: As soon as possible.</small>																																										
<small>Sample Condition CHECKED BY: Cool Intact (Initials) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No</small>																																										

Terms and Conditions: Payment will be charged on all accounts, from time 30 days past due at the rate of 20% per annum from the original date of invoice, and all costs of collection, including attorney's fees.



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ANALYTICAL RESULTS FOR
ENERCON SERVICES
ATTN: JEFF KINDLEY
306 W. WALL, SUITE 1312
MIDLAND, TX 79701
FAX TO: (915) 684-7587

Receiving Date: 11/17/00

Sampling Date: 11/17/00

Reporting Date: 11/21/00

Sample Type: SOIL

Project Number: ES-533 (EQUIVON SERVICES)

Sample Condition: COOL & INTACT

Project Name: PENROSE

Sample Received By: AH

Project Location: EUNICE, LEA COUNTY, NM

Analyzed By: BC

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/L)	DRO 10-C ₂₈) (mg/L)
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ANALYSIS DATE:		11/18/00	11/18/00
H5359-1	BOTTOM 40'	<5.0	9.01
Quality Control		9.32	10.8
True Value QC		10.0	10.0
% Recovery		93.2	108
Relative Percent Difference		11.3	2.3

METHOD: SW-846 1312, 8015 M

Bungerfield Cooke
Chemist

11/21/00
Date

H5359.XLS

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TRACEANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

Analytical and Quality Control Report

Equilon Pipeline Co.
Kyle Landreneau
PMB 174 269 CypressWood
Spring, Tx. 77388

Report Date: November 20, 2000

Order ID Number: A00111008

Project: ES-533
TA Job Code: Equiva Penrose
Casualty Code: Eunice ,Lea County New Mexico
Project Location: ES-533
Project Address:
Enercon Services Inc. / Midland / Jeff Kindley

Enclosed are the Analytical Results and Quality Control Data Reports for the following samples submitted to TraceAnalysis, Inc.

Sample	Description	Matrix	Date Taken	Time Taken	Date Received
158545	Southwall 15'	Soil	11/9/00	11:00	11/10/00
158546	Westwall 15'	Soil	11/9/00	11:10	11/10/00
158547	Eastwall 15'	Soil	11/9/00	11:20	11/10/00
158548	Northwall 15'	Soil	11/9/00	11:30	11/10/00
158549	Bottom 20'	Soil	11/9/00	11:40	11/10/00

These results represent only the samples received in the laboratory. The Quality Control Report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

This report consists of a total of 9 pages and shall not be reproduced except in its entirety, without written approval of TraceAnalysis, Inc.

Dr. Blair Leftwich, Director

Report Date: November 20, 2000
ES-533

Order Number: A00111008
Equiva Penrose

Page Number: 3 of 9
Eunice ,Lea County New Mexico

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
TFT		4.64	mg/Kg	50	0.10	92	72 - 128
4-BFB		4.74	mg/Kg	50	0.10	94	72 - 128

Sample: 158546 - Westwall 15'

Analysis: TPH DRO Analytical Method: Mod. 8015B QC Batch: QC06646 Date Analyzed: 11/14/00
Analyst: BP Preparation Method: 3550 B Prep Batch: PB05835 Date Prepared: 11/14/00

Param	Flag	Result	Units	Dilution	RDL
DRO		<50	mg/Kg	1	50

Sample: 158546 - Westwall 15'

Analysis: TPH GRO Analytical Method: 8015B QC Batch: QC06654 Date Analyzed: 11/17/00
Analyst: RC Preparation Method: N/A Prep Batch: PB05841 Date Prepared: 11/17/00

Param	Flag	Result	Units	Dilution	RDL
GRO		<5	mg/Kg	1	0.10

Sample: 158547 - Eastwall 15'

Analysis: BTEX Analytical Method: S 8021B QC Batch: QC06653 Date Analyzed: 11/17/00
Analyst: RC Preparation Method: 5035 Prep Batch: PB05840 Date Prepared: 11/17/00

Param	Flag	Result	Units	Dilution	RDL
Benzene		<0.05	mg/Kg	50	0.001
Toluene		<0.05	mg/Kg	50	0.001
Ethylbenzene		<0.05	mg/Kg	50	0.001
M,P,O-Xylene		<0.05	mg/Kg	50	0.001
Total BTEX		<0.05	mg/Kg	50	0.001

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
TFT		4.41	mg/Kg	50	0.10	88	72 - 128
4-BFB		4.83	mg/Kg	50	0.10	96	72 - 128

Sample: 158547 - Eastwall 15'

Analysis: TPH DRO Analytical Method: Mod. 8015B QC Batch: QC06646 Date Analyzed: 11/14/00
Analyst: BP Preparation Method: 3550 B Prep Batch: PB05835 Date Prepared: 11/14/00

Param	Flag	Result	Units	Dilution	RDL
DRO		<50	mg/Kg	1	50

... Continued

Surrogate	Flag	Result	Units	Dil.	Spike Amount	% Rec.	% Rec. Limit
4-BFB		4.17	mg/Kg	50	0.10	83	72 - 128

Quality Control Report Continuing Calibration Verification Standards

Sample: CCV (1)

QC Batch: QC06646

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
DRO		mg/Kg	250	271	108	75 - 125	11/14/00

Sample: ICV (1)

QC Batch: QC06646

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
DRO		mg/Kg	250	284	113	75 - 125	11/14/00

Sample: CCV (1)

QC Batch: QC06653

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
Benzene		mg/Kg	0.10	0.099	99	80 - 120	11/17/00
Toluene		mg/Kg	0.10	0.099	99	80 - 120	11/17/00
Ethylbenzene		mg/Kg	0.10	0.097	97	80 - 120	11/17/00
M,P,O-Xylene		mg/Kg	0.30	0.276	92	80 - 120	11/17/00

Sample: CCV (2)

QC Batch: QC06653

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
Benzene		mg/Kg	0.10	0.092	92	80 - 120	11/17/00
Toluene		mg/Kg	0.10	0.092	92	80 - 120	11/17/00
Ethylbenzene		mg/Kg	0.10	0.09	90	80 - 120	11/17/00
M,P,O-Xylene		mg/Kg	0.30	0.254	84	80 - 120	11/17/00

Report Date: November 20, 2000
ES-533

Order Number: A00111008
Equiva Penrose

Page Number: 9 of 9
Eunice ,Lea County New Mexico

Sample: ICV (1)

QC Batch: QC06653

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
Benzene		mg/Kg	0.10	0.099	99	80 - 120	11/17/00
Toluene		mg/Kg	0.10	0.098	98	80 - 120	11/17/00
Ethylbenzene		mg/Kg	0.10	0.097	97	80 - 120	11/17/00
M,P,O-Xylene		mg/Kg	0.30	0.275	91	80 - 120	11/17/00

Sample: CCV (1)

QC Batch: QC06654

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
GRO		mg/Kg	1	0.922	92	75 - 125	11/17/00

Sample: ICV (1)

QC Batch: QC06654

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
GRO		mg/Kg	1	0.968	96	75 - 125	11/17/00

TRACEANALYSIS, INC.

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4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

Analytical and Quality Control Report

Equilon Pipeline Co.
Kyle Landreneau
PMB 174 269 CypressWood
Spring, Tx. 77388

Report Date: December 18, 2000

Order ID Number: A00120819

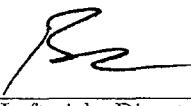
Project: ES-533
TA Job Code: Equiva Penrose
Casualty Code: Eunice ,Lea County New Mexico
Project Location: ES-533
Project Address:
Enercon Services Inc. / Midland / Jeff Kindley

Enclosed are the Analytical Results and Quality Control Data Reports for the following samples submitted to TraceAnalysis, Inc.

Sample	Description	Matrix	Date Taken	Time Taken	Date Received
160335	Bottom 40'	Soil	12/6/00	13:00	12/8/00

These results represent only the samples received in the laboratory. The Quality Control Report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

This report consists of a total of 6 pages and shall not be reproduced except in its entirety, without written approval of TraceAnalysis, Inc.


Dr. Blair Leftwich, Director

...Continued

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
Pyrene		mg/L	60	66.40	110	22 - 147	12/13/00
Benzo(a)anthracene		mg/L	60	59.80	99	41 - 127	12/13/00
Chrysene		mg/L	60	55.03	91	0 - 182	12/13/00
Benzo(b)fluoranthene		mg/L	60	59.32	98	40 - 131	12/13/00
Benzo(k)fluoranthene		mg/L	60	62.25	103	35 - 133	12/13/00
Benzo(a)pyrene		mg/L	60	60.12	100	53 - 117	12/13/00
Indeno(1,2,3-cd)pyrene		mg/L	60	61.88	103	30 - 130	12/13/00
Dibenzo(a,h)anthracene		mg/L	60	61.59	102	0 - 184	12/13/00
Benzo(g,h,i)perylene		mg/L	60	63.61	106	41 - 123	12/13/00
Nitrobenzene-d5		mg/L	60	60.83	101	27 - 115	12/13/00
2-Fluorobiphenyl		mg/L	60	61.55	102	31 - 132	12/13/00
Terphenyl-d14		mg/L	60	64.17	106	12 - 167	12/13/00

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E-Mail: lab@traceanalysis.com

Analytical and Quality Control Report

Equilon Pipeline Co.
Kyle Landreneau
PMB 174 269 CypressWood
Spring, Tx. 77388

Report Date: December 18, 2000

Order ID Number: A00120819

Project: ES-533
TA Job Code: Equiva Penrose
Casualty Code: Eunice ,Lea County New Mexico
Project Location: ES-533
Project Address:
Enercon Services Inc. / Midland / Jeff Kindley

Enclosed are the Analytical Results and Quality Control Data Reports for the following samples submitted to TraceAnalysis. Inc.

Sample	Description	Matrix	Date Taken	Time Taken	Date Received
160335	Bottom 40'	Soil	12/6/00	13:00	12/8/00

These results represent only the samples received in the laboratory. The Quality Control Report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

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Dr. Blair Leftwich, Director

Quality Control Report Continuing Calibration Verification Standards

Sample: CCV (1)

QC Batch: QC07349

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
Vinyl Chloride		µg/Kg	100	99	99	80 - 120	12/12/00
1,1-Dichloroethene		µg/Kg	100	93	93	64 - 149	12/12/00
Chloroform		µg/Kg	100	112	112	80 - 120	12/12/00
1,2-Dichloropropane		µg/Kg	100	100	100	80 - 120	12/12/00
Toluene		µg/Kg	100	102	102	70 - 127	12/12/00
Chlorobenzene		µg/Kg	100	102	102	76 - 122	12/12/00
Ethylbenzene		µg/Kg	100	104	104	80 - 120	12/12/00
Dibromofluoromethane		µg/Kg	50	53.15	106	73 - 129	12/12/00
Toluene-d8		µg/Kg	50	48.02	96	87 - 114	12/12/00
4-Bromofluorobenzene		µg/Kg	50	54.92	109	65 - 112	12/12/00