

1R - 314

APPROVALS

YEAR(S):

2001



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

June 6, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 3771-7347

Mr. Andy Price
Duke Energy Field Services
3300 North "A" St., Bldg. 7
Midland, Texas 79705

RE: CASE # 1R0314
G LOOP EUNICE SPILL
LEA COUNTY, NEW MEXICO

Dear Mr. Price:

The New Mexico Oil Conservation Division (OCD) has reviewed Duke Energy Field Services' (Duke) June 1, 2001 "DUKE ENERGY FIELD SERVICES – G LOOP EUNICE SPILL, UNIT LETTER M, SECTION 6, T-22-S, R-33-E, AMENDMENT TO REMEDIAL ACTION PLAN SUBMITTED DECEMBER 2000" and February 2, 2001 "DUKE ENERGY FILED SERVICES – G LOOP SPILL, SECTION 6, T-22-S, R-36-E". These documents contain the results of Duke's investigation of the extent of soil contamination related to the G Loop Eunice Spill site and a work plan for remediation of contaminated soils.

The above referenced work plan is approved with the following conditions:

1. Duke shall submit a report on the remediation activities by August 6, 2001. The report shall be submitted to the OCD Santa Fe Office with a copy provided to the Hobbs District Office.
2. Duke shall notify the OCD at least 48 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Please be advised that OCD approval does not relieve Duke of liability if contamination exists which is beyond the scope of the work plan, or if the activities fail to adequately remediate contamination related to Duke's activities. In addition, OCD approval does not relieve Duke of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions, please call me at (505) 476-3491.

Sincerely,

A handwritten signature in black ink, appearing to read "William C. Olson". The signature is fluid and cursive, with the first name "William" being the most prominent part.

William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office
Mitchell Ritter, Ritter Environmental & Geotechnical Services, Inc.



4 2001

RITTER ENVIRONMENTAL & GEOTECHNICAL SERVICES, INC.

2900 N. Big Spring, Midland, Texas 79705

Bus: (915) 682-7404 • (915) 570-REGS • Metro: (915) 570-6007 • Fax: (915) 682-7440

June 1, 2001

RETURN RECEIPT REQUESTED

7099 3220 0005 7552 9452

Mr. Bill Olsen
NMOCD
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Duke Energy Field Services – G Loop Eunice Spill
Unit Letter M, Section 6, T-22-S, R-33-E
Amendment to Remedial Action Plan submitted December 2000

Dear Mr. Olsen,

On behalf of Duke Energy Field Services, we are sending this letter to amend the Remedial Action Plan for the above-referenced site. The original Remedial Action Plan (RAP) was filed with the NMOCD in December 2000. In that plan, the soils that were stockpiled at the surface were to be included with those soils that were beneath or near the surface soils and landfarmed on the site. The landowner approved of landfarming the undisturbed surface soils at the location of the spill; however, he did request that we transfer the stockpiled soils off-site to a permitted landfarm. Therefore, we have contracted with the Clay Cooper landfarm to accept the stockpiled soils.

We will proceed with the Remedial Action Plan as written in the original report for the remainder of the impacted soils.

If you have any further questions or comments, please contact me at your earliest convenience.

Sincerely,

Mitchell Ritter

cc: Mr. Bill Olsen, NMOCD, Santa Fe, New Mexico
Mr. Stan Shaver, DEFS, Hobbs, New Mexico
Mr. Andy Price, DEFS, Midland, Texas
Mr. Paul Mulkey, DEFS, Hobbs, New Mexico



RITTER ENVIRONMENTAL & GEOTECHNICAL SERVICES, INC.

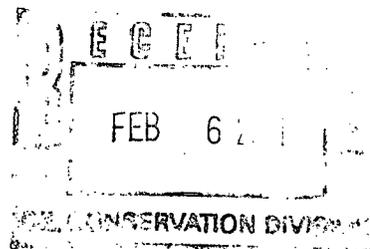
2900 N. Big Spring, Midland, Texas 79705

Bus: (915) 682-7404 • (915) 570-REGS • Metro: (915) 570-6007 • Fax: (915) 682-7440

February 2, 2001

CERTIFIED RETURN RECEIPT

7099 3220 0005 7552 9063



Mr. Bill Olsen
New Mexico Oil Conservation Division
1220 St. Francis Drive
Santa Fe, New Mexico 87505

Re: Duke Energy Field Services - G Loop Spill
Section 6, T-22-S, R-36-E

Dear Mr. Olsen,

Enclosed please find the Site Assessment Report and Remedial Action Plan for the above-referenced spill.

I have discussed this with Chris Williams at the Hobbs District office and he said he would have to lean on you to help him out until he can replace Ms. Donna Williams.

Please let me know if you have any questions or comments. (915/682-7404)

Sincerely,

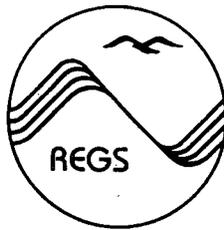
Mitchell Ritter

MR/bp

cc: Mr. Andy Price
cc: Mr. Chris Williams, Hobbs, New Mexico

CERTIFIED RETURN RECEIPT

7099 3220 0005 7552 9056



RITTER ENVIRONMENTAL & GEOTECHNICAL SERVICES, INC.

2900 N. Big Spring, Midland, Texas 79705

Bus: (915) 682-7404 • (915) 570-REGS • Metro: (915) 570-6007 • Fax: (915) 682-7440

July 24, 2001

CERTIFIED RETURN RECEIPT

7099 3220 0005 7552 9841

Mr. Bill Olsen
NMOCD
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Remediation Report Case # 1R0314
G Loop Eunice Spill
Lea County, New Mexico

01 JUL 26 PM 1:40
OIL CONSERVATION DIV.

Dear Mr. Olsen,

On behalf of Duke Energy Field Services, Inc. (DEFS), Ritter Environmental & Geotechnical Services is pleased to submit this report on the remediation activities as requested in your June 6, 2001 letter to Mr. Andy Price with DEFS.

On May 22, 2001, approximately 100 cubic yards of stockpiled contaminated soils were removed from the site and transported to the Cooper landfarm. This was in accordance with the landowner's request to remove these soils from the site and in accordance with the Amended Remedial Action Plan, which was submitted by letter to the NMOCD on June 1, 2001. Copies of the analyses of the composite sample for the spoil pile, which were delivered to the South Monument Waste Management Facility Section 25, T-20-S, R-36-E, Lea County, New Mexico are included with this report. The results are as follows:

| TPH/DRO (mg/Kg) | TPH/GRO (mg/Kg) | Benzene (mg/Kg) | Toluene (mg/Kg) | Ethyl Benzene (mg/Kg) | Xylene (mg/Kg) | Total BTEX (mg/Kg) |
|----------------------------|----------------------------|----------------------------|----------------------------|--------------------------------------|---------------------------|-----------------------------------|
| 19,700 | 133.8 | 0.0235 | 0.067 | 0.192 | 0.62 | 0.902 |

Also, in accordance with the original Remedial Action Plan, and after bringing the impacted soils to the surface, the site was tilled to a depth sufficient to turn and till the impacted soils for aeration and biodegradation on June 20, 2001.

Photographic documentation of the current site conditions is presented with this report.

Mr. Bill Olsen

July 24, 2001

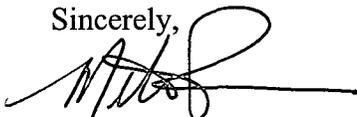
Page 2

Currently, we are considering increasing the rate of soil tilling to a monthly schedule to enhance the rate of remediation of the impacted soil. The current Remedial Action Plan, as approved by the NMOCD, is scheduled for quarterly tilling for one year until the NMOCD guidelines of TPH < 5000 mg/Kg, DRO+GRO < 50 mg/Kg and Benzene < 10 mg/Kg are met.

A final report and closure request will be submitted to the NMOCD when confirmation sampling has determined that the required levels of constituents have been achieved.

If you have any questions or further comments, please call me or you can refer them to Ms. Vickie Gunter with Duke Energy Field Services, Inc., P.O. Box 50020, Midland, Texas 79710.

Sincerely,



Mitchell Ritter

cc: Mr. Stan Shaver, DEFS, Hobbs, New Mexico
Ms. Vickie Gunter, DEFS, Midland, Texas
Mr. Paul Sheeley, NMOCD, Hobbs, New Mexico

Enclosures



1-1 Eunice G Loop Spill Site 6/27/01
Looking South



1-2 Eunice G Loop Spill Site 6/27/01
Looking South



1-3 Eunice G Loop Spill Site 6/27/01
Looking West



1-4 Eunice G Loop Spill Site 6/27/01
Looking South



1-5 Eunice G Loop Spill Site 6/27/01
Looking Southwest



1-6 Eunice G Loop Spill Site 6/27/01
Looking Southwest



1-7 Eunice G Loop Spill Site 6/27/01
Looking Southeast



1-8 Eunice G Loop Spill Site 6/27/01
Looking Southeast



1-9 Eunice G Loop Spill Site 6/27/01
Looking Southeast



1-10 Eunice G Loop Spill Site 6/27/01
Looking Southeast



1-11 Eunice G Loop Spill Site 6/27/01
Looking South



1-12 Eunice G Loop Spill Site 6/27/01
Looking Southeast



1-13 Eunice G Loop Spill Site 6/27/01
Looking Southeast



1-14 Eunice G Loop Spill Site 6/27/01
South End of Spill Looking South, Southeast



1-15 Eunice G Loop Spill Site 6/27/01
South End Looking East



1-16 Eunice G Loop Spill Site 6/27/01
South End Looking East



2-1 Eunice G Loop Spill Site 6/27/01
South End Looking Northeast



2-2 Eunice G Loop Spill Site 6/27/01
South End Looking Northwest



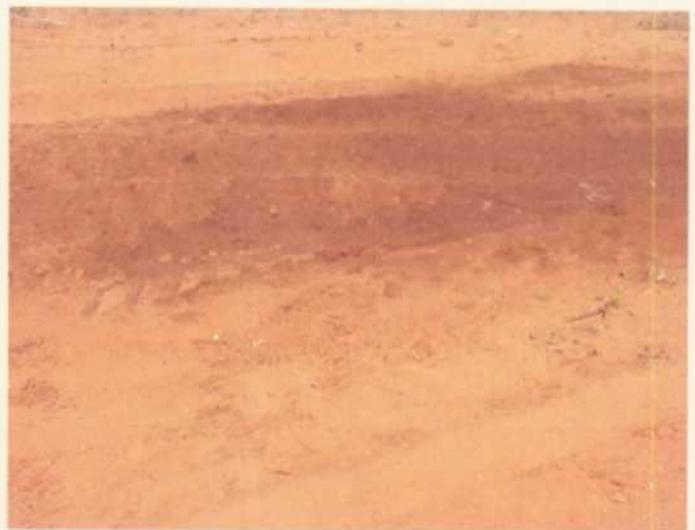
2-3 Eunice G Loop Spill Site 6/27/01
Looking North



2-4 Eunice G Loop Spill Site 6/27/01
Looking North



2-5 Eunice G Loop Spill Site 6/27/01
Looking West



2-6 Eunice G Loop Spill Site 6/27/01
Looking Northwest



2-7 Eunice G Loop Spill Site 6/27/01
Looking West



2-8 Eunice G Loop Spill Site 6/27/01
Looking West



2-9 Eunice G Loop Spill Site 6/27/01
Looking West



2-10 Eunice G Loop Spill Site 6/27/01
Looking Northwest



2-11 Eunice G Loop Spill Site 6/27/01
Looking Northwest



2-12 Eunice G Loop Spill Site 6/27/01
Looking West



2-13 Eunice G Loop Spill Site 6/27/01
Looking Northwest



2-14 Eunice G Loop Spill Site 6/27/01
Looking Northwest



2-15 Eunice G Loop Spill Site 6/27/01
Looking West End of Spill



2-16 Eunice G Loop Spill Site 6/27/01
End of Spill, North End Looking South

JUN 11 2001

Report Date: June 4, 2001 Order Number: A01052423

Page Number: 1 of 1

N/A

DEFS/Eunice

N/A

Summary Report

Mitch Ritter
Ritter Environmental
2900 N. Big Spring
Midland, TX 79705

Report Date: June 4, 2001

Order ID Number: A01052423

Project Number: N/A
Project Name: DEFS/Eunice
Project Location: N/A

| Sample | Description | Matrix | Date Taken | Time Taken | Date Received |
|--------|-------------|--------|------------|------------|---------------|
| 171845 | SP-1-52201 | Soil | 5/22/01 | 9:00 | 5/24/01 |

This report consists of a total of 1 page(s) and is intended only as a summary of results for the sample(s) listed above.

| Sample - Field Code | BTEX | | | | | TPH DRO | TPH GRO |
|---------------------|--------------------|--------------------|-------------------------|-------------------------|-----------------------|----------------|----------------|
| | Benzene (mg/Kg) | Toluene (mg/Kg) | Ethylbenzene (mg/Kg) | M,P,O-Xylene (mg/Kg) | Total BTEX (mg/Kg) | DRO (mg/Kg) | GRO (mg/Kg) |
| 171845 - SP-1-52201 | 0.0235 | 0.067 | 0.192 | 0.62 | 0.902 | 19700 | 133.8 |



6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
 155 McCutcheon, Suite H El Paso, Texas 79932 888•588•3443 915•585•3443 FAX 915•585•4944
 E-Mail: lab@traceanalysis.com

Analytical and Quality Control Report

Mitch Ritter
 Ritter Environmental
 2900 N. Big Spring
 Midland, TX 79705

Report Date: June 4, 2001

Order ID Number: A01052423

Project Number: N/A
 Project Name: DEFS/Eunice
 Project Location: N/A

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

| Sample | Description | Matrix | Date Taken | Time Taken | Date Received |
|--------|-------------|--------|------------|------------|---------------|
| 171845 | SP-1-52201 | Soil | 5/22/01 | 9:00 | 5/24/01 |

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 including the chain of custody (COC), without written approval of TraceAnalysis, Inc.



 Dr. Blair Leftwich, Director

Analytical Report

Sample: 171845 - SP-1-52201

Analysis: BTEX Analytical Method: S 8021B QC Batch: QC11550 Date Analyzed: 5/25/01
Analyst: JW Preparation Method: E 5035 Prep Batch: PB09890 Date Prepared: 5/25/01

| Param | Flag | Result | Units | Dilution | RDL |
|--------------|------|--------|-------|----------|-------|
| Benzene | | 0.0235 | mg/Kg | 13 | 0.001 |
| Toluene | | 0.067 | mg/Kg | 13 | 0.001 |
| Ethylbenzene | | 0.192 | mg/Kg | 13 | 0.001 |
| M,P,O-Xylene | | 0.62 | mg/Kg | 13 | 0.001 |
| Total BTEX | | 0.902 | mg/Kg | 13 | 0.001 |

| Surrogate | Flag | Result | Units | Dilution | Spike Amount | Percent Recovery | Recovery Limits |
|-----------|------|--------|-------|----------|--------------|------------------|-----------------|
| TFT | | 1.01 | mg/Kg | 13 | 0.10 | 77 | 72 - 128 |
| 4-BFB | 1 | 2.08 | mg/Kg | 13 | 0.10 | 160 | 72 - 128 |

Sample: 171845 - SP-1-52201

Analysis: TPH DRO Analytical Method: Mod. 8015B QC Batch: QC11609 Date Analyzed: 6/1/01
Analyst: JJ Preparation Method: 3550 B Prep Batch: PB09936 Date Prepared: 5/31/01

| Param | Flag | Result | Units | Dilution | RDL |
|-------|------|--------|-------|----------|-----|
| DRO | | 19700 | mg/Kg | 20 | 50 |

| Surrogate | Flag | Result | Units | Dilution | Spike Amount | Percent Recovery | Recovery Limits |
|-----------|------|--------|-------|----------|--------------|------------------|-----------------|
| n-Octane | | 5230 | mg/Kg | 20 | 250 | 104 | 70 - 130 |

Sample: 171845 - SP-1-52201

Analysis: TPH GRO Analytical Method: 8015B QC Batch: QC11551 Date Analyzed: 5/25/01
Analyst: JW Preparation Method: 5035 Prep Batch: PB09890 Date Prepared: 5/25/01

| Param | Flag | Result | Units | Dilution | RDL |
|-------|------|--------|-------|----------|------|
| GRO | | 133.8 | mg/Kg | 1 | 0.10 |

¹Surrogate recovery outside of normal range due to matrix difficulties.

Quality Control Report Method Blank

Method Blank QCBatch: QC11550

| Param | Flag | Results | Units | Reporting Limit |
|--------------|------|---------|-------|-----------------|
| Benzene | | <0.013 | mg/Kg | 0.001 |
| Toluene | | <0.013 | mg/Kg | 0.001 |
| Ethylbenzene | | <0.013 | mg/Kg | 0.001 |
| M,P,O-Xylene | 2 | 0.0135 | mg/Kg | 0.001 |
| Total BTEX | | 0.0135 | mg/Kg | 0.001 |

Method Blank QCBatch: QC11551

| Param | Flag | Results | Units | Reporting Limit |
|-------|------|---------|-------|-----------------|
| GRO | | <1.3 | mg/Kg | 0.10 |

Method Blank QCBatch: QC11609

| Param | Flag | Results | Units | Reporting Limit |
|-------|------|---------|-------|-----------------|
| DRO | | <50 | mg/Kg | 50 |

| Surrogate | Flag | Result | Units | Dilution | Spike Amount | Percent Recovery | Recovery Limits |
|-----------|------|--------|-------|----------|--------------|------------------|-----------------|
| n-Octane | | <0 | mg/Kg | 1 | 250 | 102 | 70 - 130 |

Quality Control Report Lab Control Spikes and Duplicate Spikes

Laboratory Control Spikes QCBatch: QC11550

| Param | LCS Result | LCSD Result | Units | Dil. | Spike Amount Added | Matrix Result | % Rec | RPD | % Rec Limit | RPD Limit |
|--------------|------------|-------------|-------|------|--------------------|---------------|-------|-----|-------------|-----------|
| MTBE | 1.12 | 1.14 | mg/Kg | 13 | 0.10 | <0.013 | 86 | 1 | 80 - 120 | 20 |
| Benzene | 1.16 | 1.17 | mg/Kg | 13 | 0.10 | <0.013 | 89 | 0 | 80 - 120 | 20 |
| Toluene | 1.16 | 1.17 | mg/Kg | 13 | 0.10 | <0.013 | 89 | 0 | 80 - 120 | 20 |
| Ethylbenzene | 1.16 | 1.17 | mg/Kg | 13 | 0.10 | <0.013 | 89 | 0 | 80 - 120 | 20 |
| M,P,O-Xylene | 3.38 | 3.42 | mg/Kg | 13 | 0.30 | 0.0135 | 86 | 1 | 80 - 120 | 20 |

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

²Method blank outside of normal range due to matrix difficulties.

| Surrogate | LCS Result | LCSD Result | Units | Dilution | Spike Amount | LCS % Rec | LCSD % Rec | Recovery Limits |
|-----------|------------|-------------|-------|----------|--------------|-----------|------------|-----------------|
| TFT | 1.2 | 1.2 | mg/Kg | 13 | 0.10 | 92 | 92 | 72 - 128 |
| 4-BFB | 1.23 | 1.24 | mg/Kg | 13 | 0.10 | 94 | 95 | 72 - 128 |

Laboratory Control Spikes QCBatch: QC11551

| Param | LCS Result | LCSD Result | Units | Dil. | Spike Amount Added | Matrix Result | % Rec | RPD | % Rec Limit | RPD Limit |
|-------|------------|-------------|-------|------|--------------------|---------------|-------|-----|-------------|-----------|
| GRO | 0.963 | 0.99 | mg/Kg | 1 | 1 | <1.3 | 96 | 2 | 70 - 130 | 20 |

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

Laboratory Control Spikes QCBatch: QC11609

| Param | LCS Result | LCSD Result | Units | Dil. | Spike Amount Added | Matrix Result | % Rec | RPD | % Rec Limit | RPD Limit |
|-------|------------|-------------|-------|------|--------------------|---------------|-------|-----|-------------|-----------|
| DRO | 286 | 239 | mg/Kg | 1 | 250 | <50 | 114 | 21 | 70 - 130 | 20 |

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

| Surrogate | LCS Result | LCSD Result | Units | Dilution | Spike Amount | LCS % Rec | LCSD % Rec | Recovery Limits |
|-----------|------------|-------------|-------|----------|--------------|-----------|------------|-----------------|
| n-Octane | 265 | 239 | mg/Kg | 1 | 250 | 106 | 95 | 70 - 130 |

Quality Control Report Matrix Spikes and Duplicate Spikes

Matrix Spikes QCBatch: QC11550

| Param | MS Result | MSD Result | Units | Dil. | Spike Amount Added | Matrix Result | % Rec | RPD | % Rec Limit | RPD Limit |
|--------------|-----------|------------|-------|------|--------------------|---------------|-------|-----|-------------|-----------|
| Benzene | 0.59 | | mg/Kg | 13 | 0.10 | <0.013 | 45 | | 80 - 120 | |
| Toluene | 0.578 | | mg/Kg | 13 | 0.10 | <0.013 | 44 | | 80 - 120 | |
| Ethylbenzene | 0.594 | | mg/Kg | 13 | 0.10 | 0.0271 | 43 | | 80 - 120 | |
| M,P,O-Xylene | 1.71 | | mg/Kg | 13 | 0.30 | 0.036 | 42 | | 80 - 120 | |

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

| Surrogate | MS Result | MSD Result | Units | Dilution | Spike Amount | MS % Rec | MSD % Rec | Recovery Limits |
|-----------|-----------|------------|-------|----------|--------------|----------|-----------|-----------------|
| TFT | 0.916 | | mg/Kg | 13 | 0.10 | 70 | | 72 - 128 |
| 4-BFB | 1.14 | | mg/Kg | 13 | 0.10 | 87 | | 72 - 128 |

Matrix Spikes QCBatch: QC11609

| Param | MS Result | MSD Result | Units | Dil. | Spike Amount Added | Matrix Result | % Rec | RPD | % Rec Limit | RPD Limit |
|-------|-----------|------------|-------|------|--------------------|---------------|-------|-----|-------------|-----------|
| DRO | 246 | 295 | mg/Kg | 1 | 250 | <50 | 98 | 18 | 70 - 130 | 20 |

Percent recovery is based on the spike result. RPD is based on the spike and spike duplicate result.

| Surrogate | MS Result | MSD Result | Units | Dilution | Spike Amount | MS % Rec | MSD % Rec | Recovery Limits |
|-----------|-----------|------------|-------|----------|--------------|----------|-----------|-----------------|
| n-Octane | 260 | 272 | mg/Kg | 1 | 250 | 104 | 108 | 70 - 130 |

Quality Control Report Continuing Calibration Verification Standards

CCV (1) QCBatch: QC11550

| Param | Flag | Units | CCVs True Conc. | CCVs Found Conc. | CCVs Percent Recovery | Percent Recovery Limits | Date Analyzed |
|--------------|------|-------|-----------------|------------------|-----------------------|-------------------------|---------------|
| MTBE | | mg/Kg | 0.10 | 0.0843 | 84 | 85 - 115 | 5/25/01 |
| Benzene | | mg/Kg | 0.10 | 0.0852 | 85 | 85 - 115 | 5/25/01 |
| Toluene | | mg/Kg | 0.10 | 0.088 | 88 | 85 - 115 | 5/25/01 |
| Ethylbenzene | | mg/Kg | 0.10 | 0.0887 | 88 | 85 - 115 | 5/25/01 |
| M,P,O-Xylene | | mg/Kg | 0.30 | 0.268 | 89 | 85 - 115 | 5/25/01 |

CCV (2) QCBatch: QC11550

| Param | Flag | Units | CCVs True Conc. | CCVs Found Conc. | CCVs Percent Recovery | Percent Recovery Limits | Date Analyzed |
|--------------|------|-------|-----------------|------------------|-----------------------|-------------------------|---------------|
| MTBE | | mg/Kg | 0.10 | 0.0843 | 84 | 85 - 115 | 5/25/01 |
| Benzene | | mg/Kg | 0.10 | 0.0852 | 85 | 85 - 115 | 5/25/01 |
| Toluene | | mg/Kg | 0.10 | 0.088 | 88 | 85 - 115 | 5/25/01 |
| Ethylbenzene | | mg/Kg | 0.10 | 0.0887 | 88 | 85 - 115 | 5/25/01 |
| M,P,O-Xylene | | mg/Kg | 0.30 | 0.2677 | 89 | 85 - 115 | 5/25/01 |

ICV (1) QCBatch: QC11550

| Param | Flag | Units | CCVs True Conc. | CCVs Found Conc. | CCVs Percent Recovery | Percent Recovery Limits | Date Analyzed |
|--------------|------|-------|-----------------|------------------|-----------------------|-------------------------|---------------|
| MTBE | | mg/Kg | 0.10 | 0.0839 | 83 | 85 - 115 | 5/25/01 |
| Benzene | | mg/Kg | 0.10 | 0.0847 | 84 | 85 - 115 | 5/25/01 |
| Toluene | | mg/Kg | 0.10 | 0.0858 | 85 | 85 - 115 | 5/25/01 |
| Ethylbenzene | | mg/Kg | 0.10 | 0.0857 | 85 | 85 - 115 | 5/25/01 |
| M,P,O-Xylene | | mg/Kg | 0.30 | 0.252 | 84 | 85 - 115 | 5/25/01 |

CCV (1) QCBatch: QC11551

| Param | Flag | Units | CCVs True Conc. | CCVs Found Conc. | CCVs Percent Recovery | Percent Recovery Limits | Date Analyzed |
|-------|------|-------|-----------------|------------------|-----------------------|-------------------------|---------------|
| GRO | | mg/Kg | 1 | 1.03 | 103 | 75 - 125 | 5/25/01 |

ICV (1) QCBatch: QC11551

| Param | Flag | Units | CCVs True Conc. | CCVs Found Conc. | CCVs Percent Recovery | Percent Recovery Limits | Date Analyzed |
|-------|------|-------|-----------------|------------------|-----------------------|-------------------------|---------------|
| GRO | | mg/Kg | 1 | 1.02 | 102 | 75 - 125 | 5/25/01 |

CCV (1) QCBatch: QC11609

| Param | Flag | Units | CCVs True Conc. | CCVs Found Conc. | CCVs Percent Recovery | Percent Recovery Limits | Date Analyzed |
|----------|------|-------|-----------------|------------------|-----------------------|-------------------------|---------------|
| DRO | | mg/Kg | 250 | 281 | 112 | 75 - 125 | 6/1/01 |
| n-Octane | | mg/Kg | 250 | 254 | 101 | 75 - 125 | 6/1/01 |

CCV (2) QCBatch: QC11609

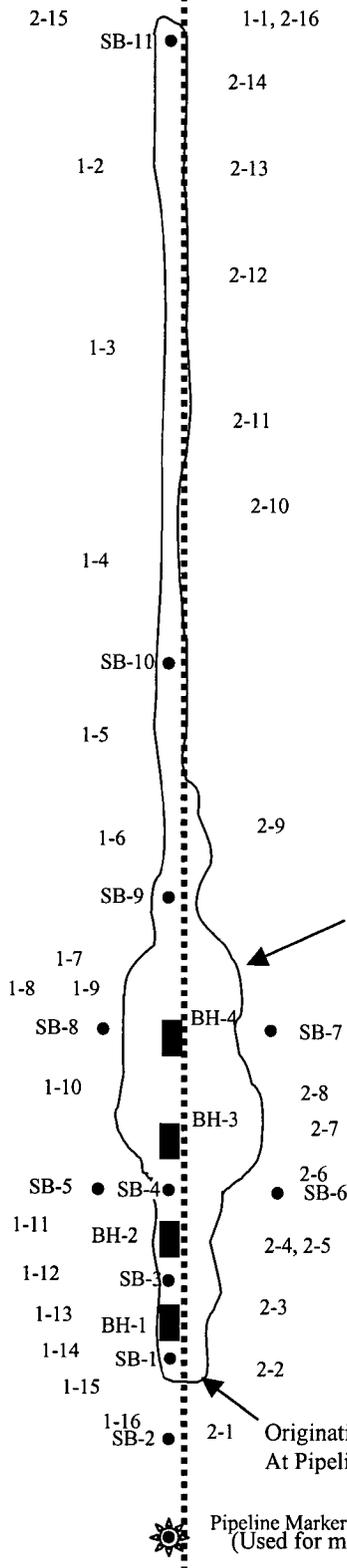
| Param | Flag | Units | CCVs True Conc. | CCVs Found Conc. | CCVs Percent Recovery | Percent Recovery Limits | Date Analyzed |
|----------|------|-------|-----------------|------------------|-----------------------|-------------------------|---------------|
| DRO | | mg/Kg | 250 | 263 | 105 | 75 - 125 | 6/1/01 |
| n-Octane | | mg/Kg | 250 | 251 | 100 | 75 - 125 | 6/1/01 |

CCV (3) QCBatch: QC11609

| 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 | 6/1/01 |
| n-Octane | | mg/Kg | 250 | 243 | 97 | 75 - 125 | 6/1/01 |

ICV (1) QCBatch: QC11609

| Param | Flag | Units | CCVs True Conc. | CCVs Found Conc. | CCVs Percent Recovery | Percent Recovery Limits | Date Analyzed |
|----------|------|-------|-----------------|------------------|-----------------------|-------------------------|---------------|
| DRO | | mg/Kg | 250 | 258 | 103 | 75 - 125 | 6/1/01 |
| n-Octane | | mg/Kg | 250 | 237 | 94 | 75 - 125 | 6/1/01 |



Area of Pooling

Direction of Flow

Origination of Spill
At Pipeline Leak

Pipeline Marker
(Used for measurements)

| Legend | |
|---|----------------------------|
| The numbers 1-1 through 2-16 represent the location of the photograph | |
| | Excavations = BH |
| | Soil boring locations = SB |
| | Outline of spill area |

16 inch Natural Gas Pipeline

| |
|--|
| <p>Ritter Environmental</p> <p>Duke Energy Field Services</p> <p>Eunice G Loop Spill</p> <p>Photo locations</p> <p>Spill Area Map</p> <p>SE4/SW4 of Sec 6 T-22-S R-36-E Lea Co. NM</p> <p>Scale 1 inch = 100 feet</p> <p>June-2001</p> |
|--|

SOUTH MONUMENT SURFACE WASTE FACILITY

TICKET NO # 2301

LEASE OPERATOR

ORIGINATING LOCATION: G LOOP EUNICE LEAK
Sec 6 T22S R36E SE4SW4

Duke Energy Field Services, Inc.

Ritter Environmental

TRANSPORTER NAME & ADDRESS

WALTON CONSTRUCTION CO., INC.
P. O. BOX 478
HOBBS, NM 00241-0478

Attn: KENA KAY COOPER

DESCRIPTION OF WASTE

QUANTITY

Non-Hazardous Hydrocarbons

2.4 yds

FACILITY CONTACT:

Ken La Cey
SIGNATURE OF CONTACT

5/22/01
DATE

CELL NUMBER MATERIAL WAS PLACE IN LANDFARM: B-1

NAME OF TRANSPORTER (DRIVER):

Ken La Cey
SIGNATURE OF DRIVER

5-22-01
DATE

DISPOSAL SITE

South Monument Surface Waste Facility
P. O. Box 418
Hobbs, NM 88241-0418
Sec 25 T20S R36E N/2NE/4

"As a condition of acceptance for disposal, I hereby certify that this waste is an exempt waste as defined by the Environmental Protection Agency (EPA). The waste are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C regulations; and not mixed with non-exempt waste."

Ken La Cey
FACILITY REPRESENTATIVE

5/22/01
DATE

SOUTH MONUMENT SURFACE WASTE FACILITY

TICKET NO # 2302

LEASE OPERATOR

Duke Energy Field Services, Inc.

ORIGINATING LOCATION: G LOOP EUNICE LEAK
Sec 6 T22S R36E SE4SW4

Ritter Environmental
TRANSPORTER NAME & ADDRESS

WALTON CONSTRUCTION CO., INC.
P. O. BOX 478
HOBBS, NM 88241-0478

Attn: KENA KAY COOPER

DESCRIPTION OF WASTE

Non-Hazardous Hydrocarbons

QUANTITY

24 yds

FACILITY CONTACT:

Kena Kay Cooper
SIGNATURE OF CONTACT

5/23/01
DATE

CELL NUMBER MATERIAL WAS PLACE IN LANDFARM: B-1

NAME OF TRANSPORTER (DRIVER):

Kena Kay Cooper
SIGNATURE OF DRIVER

5-23-01
DATE

DISPOSAL SITE

South Monument Surface Waste Facility
P. O. Box 418
Hobbs, NM 88241-0418
Sec 25 T20S R36E N/2NE/4

"As a condition of acceptance for disposal, I hereby certify that this waste is an exempt waste as defined by the Environmental Protection Agency (EPA). The waste are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C regulations; and not mixed with non-exempt waste."

Kena Kay Cooper
FACILITY REPRESENTATIVE

5/23/01
DATE

SOUTH MONUMENT SURFACE WASTE FACILITY

TICKET NO # 2303

LEASE OPERATOR

ORIGINATING LOCATION: G LOOP EUNICE LEAK
Sec 6 T22S R36E SE4SW4

Duke Energy Field Services, Inc.

Ritter Environmental

TRANSPORTER NAME & ADDRESS

WALTON CONSTRUCTION CO., INC.
P. O. BOX 478
HOBBS, NM 88241-0478

Attn: KENA KAY COOPER

DESCRIPTION OF WASTE

QUANTITY

Non-Hazardous Hydrocarbons

27 yds

FACILITY CONTACT:

SIGNATURE OF CONTACT

DATE

CELL NUMBER MATERIAL WAS PLACE IN LANDFARM: B-1

NAME OF TRANSPORTER (DRIVER):

SIGNATURE OF DRIVER

DATE

DISPOSAL SITE

South Monument Surface Waste Facility
P. O. Box 418
Hobbs, NM 88241-0418
Sec 25 T20S R36E N/2NE/4

"As a condition of acceptance for disposal, I hereby certify that this waste is an exempt waste as defined by the Environmental Protection Agency (EPA). The waste are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C regulations; and not mixed with non-exempt waste."

FACILITY REPRESENTATIVE

DATE

SOUTH MONUMENT SURFACE WASTE FACILITY

TICKET NO # 2304

LEASE OPERATOR

ORIGINATING LOCATION: G LOOP EUNICE LEAK
Sec 6 T22S R36E SE4SW4

Duke Energy Field Services, Inc.
Ritter Environmental

TRANSPORTER NAME & ADDRESS

WALTON CONSTRUCTION CO., INC.
P. O. BOX 478
HOBBS, NM 88241-0478

Attn: KENN KAY COOPER

DESCRIPTION OF WASTE

QUANTITY

Non-Hazardous Hydrocarbons

24 yds

FACILITY CONTACT:

SIGNATURE OF CONTACT

[Handwritten Signature]

DATE

5/22/01

CELL NUMBER MATERIAL WAS PLACE IN LANDFARM: B-1

NAME OF TRANSPORTER (DRIVER):

SIGNATURE OF DRIVER

[Handwritten Signature]

DATE

5-22-01

DISPOSAL SITE

South Monument Surface Waste Facility
P. O. Box 418
Hobbs, NM 88241-0418
Sec 25 T20S R36E N/2NE/4

"As a condition of acceptance for disposal, I hereby certify that this waste is an exempt waste as defined by the Environmental Protection Agency (EPA). The waste are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C regulations; and not mixed with non-exempt waste."

FACILITY REPRESENTATIVE

[Handwritten Signature]

DATE

5/22/01