

1R - 440

REPORTS

DATE:

9/19/2005



IR 0440

Highlander Environmental Corp.

Midland, Texas

September 19, 2005

RECEIVED

OCT 3 2005

**OIL CONSERVATION
DIVISION**

Mr. Glenn von Gonten
New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau
1220 S. St. Francis Drive
Santa Fe, New Mexico 87504

Re: Additional Soil Boring Data and Addendum To "Subsurface Investigation and Work Plan for the Pogo Producing Company, E.C. Hill "A, B and C" Tank Battery, Located in Section 27, Township 23 South, Range 37 East, Lea County New Mexico", dated February 8, 2005.

Dear Mr. von Gonten:

In reference to your response letter dated August 15, 2005 and our subsequent meeting in Santa Fe, New Mexico on August 22, 2005, this letter is written to supply additional borehole information generated in order to further delineate the area to be capped. As previously reported, Highlander supervised the placement of one additional soil boring labeled BH-12 (MW-2) on May 24, 2005. TPH concentrations were not detected at or above laboratory reporting limits of 10 mg/kg for any sample, with the exception of the 10'-12' sample, which had a TPH concentration of 18.4 mg/kg.

An additional soil boring, as proposed in the July 11, 2005 "Addendum to Subsurface Work Plan..." was placed north of BH-1 to further delineate the north, between MW-2, MW-3 and BH-8. No TPH concentrations were detected at or above reporting limits of 10 mg/kg.

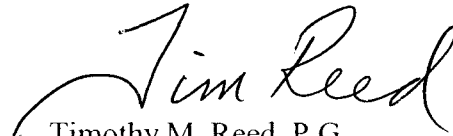
As discussed in our meeting in Santa Fe, the site has a slight slope from the northwest to the southeast and all indications are that spills trended towards the southeast of the facility. It is also evident from the soil borings and excavations performed at this site that there was very little lateral migration of hydrocarbons in subsurface soils.

Based upon the data from BH-12, and BH-13, and utilizing existing borehole data, an iso-concentration map was generated to show the approximate boundary of the 1000 mg/kg TPH impacted soil at this site. This figure is included as Figure 2. Figure 2 indicates that the proposed cap is sufficient to properly isolate the remaining soil with TPH concentrations of 1000 mg/kg or more.

Based upon the current data submission, Pogo respectfully requests approval of the previously submitted work plan for capping of this site.

If you have any question or comments concerning the assessment or the activities performed at the Site, please call me at (432) 682-4559.

Respectfully submitted,
Highlander Environmental Corp.

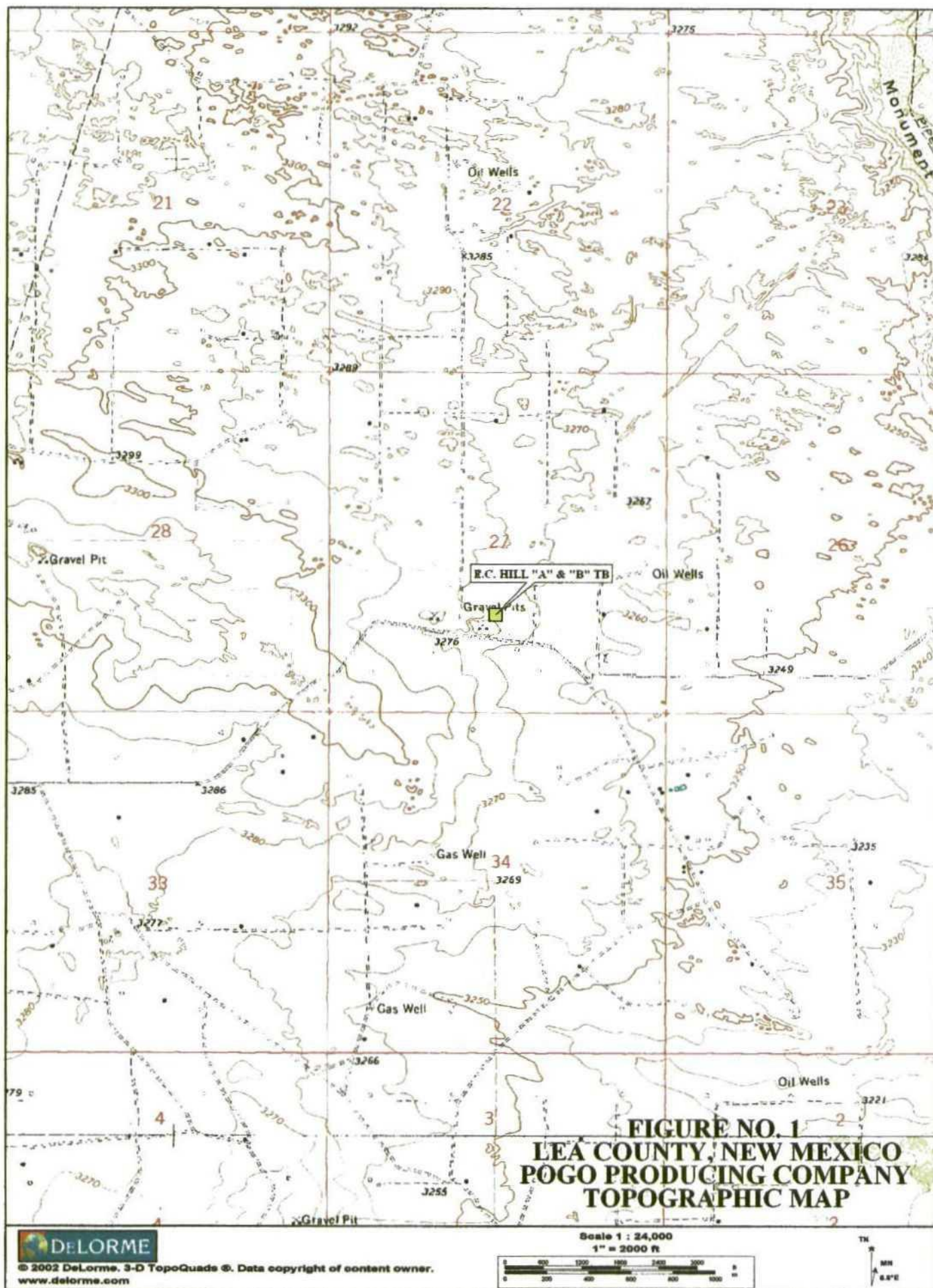


Timothy M. Reed, P.G.
Vice President

cc: Pat Ellis - Pogo
Don Riggs - Pogo



FIGURES



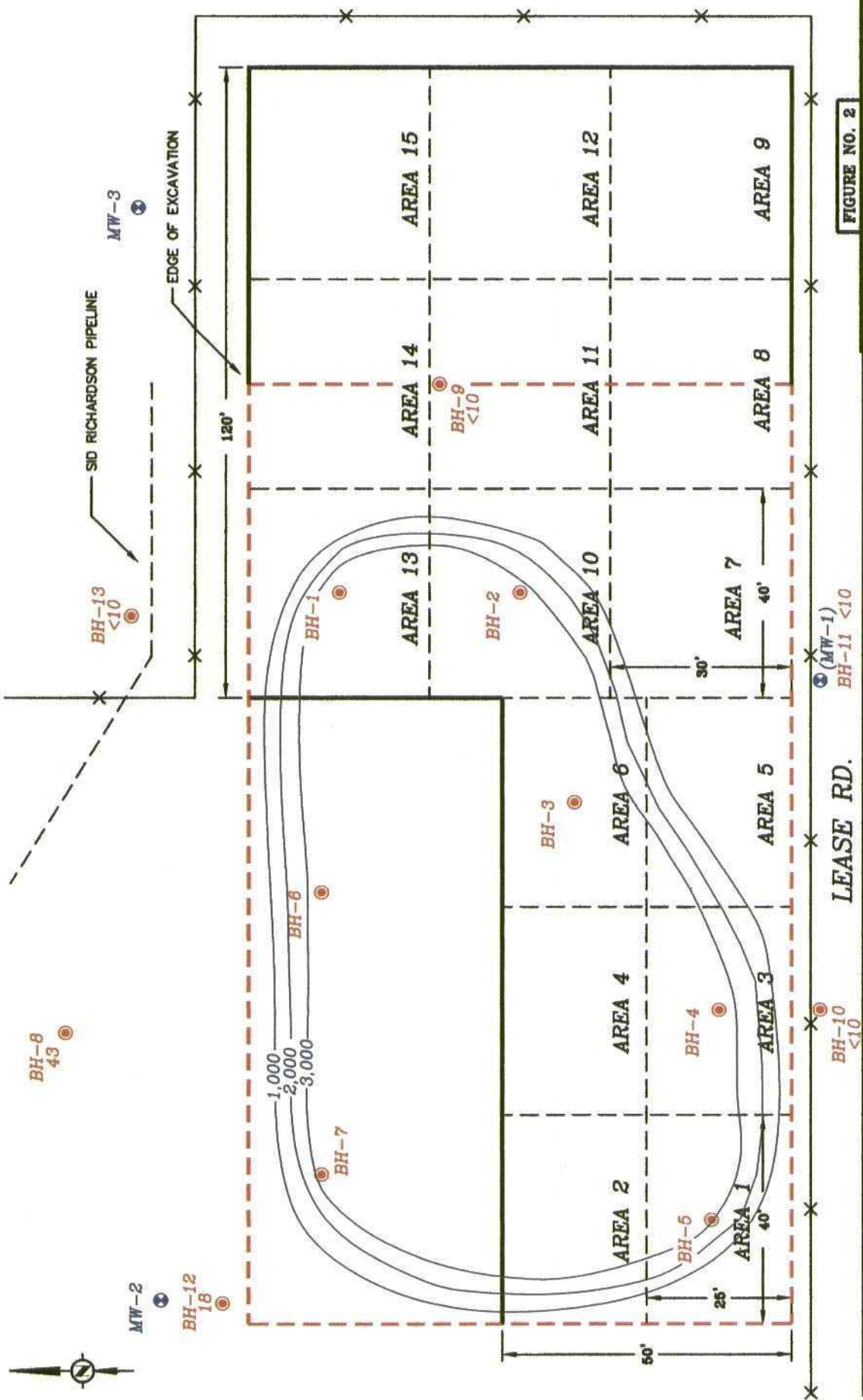


FIGURE NO. 2

LEA COUNTY, NEW MEXICO

POGO PRODUCING COMPANY

E.C. HILL "A" "B" & "C" TB
AREA OF CONCERN

HIGHLANDER ENVIRONMENTAL CORP.
MIDLAND, TEXAS

DATE:	9/14/05
DWG. BY:	JJ
FILE:	100' X 180'

PROPOSED PERIMETER TO CAP (AREA 100' X 180')

- MONITOR WELL
- BOREHOLE LOCATION

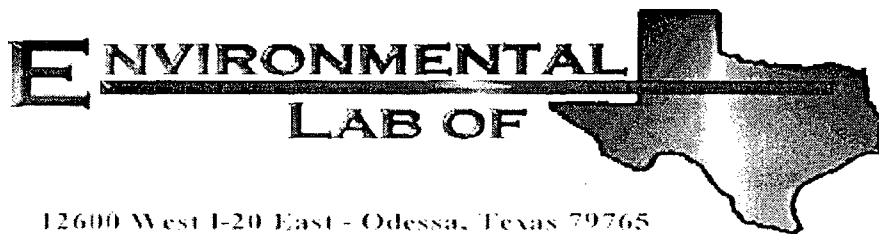
NOT TO SCALE

LEASE RD.

(MW-1)
BH-11 <10

BH-10
<10

APPENDIX A



12600 West I-20 East - Odessa, Texas 79765

Analytical Report

Prepared for:

Ike Tavaréz

Highlander Environmental Corp.

1910 N. Big Spring St.

Midland, TX 79705

Project: Pogo/ E.C. Hill T.B.

Project Number: 1746

Location: Lea Co., NM

Lab Order Number: 5102003

Report Date: 09/07/05

Highlander Environmental Corp.
1910 N. Big Spring St.
Midland TX. 79705

Project: Pogo/ E.C. Hill T.B.
Project Number: 1746
Project Manager: Ike Tavarez

Fax: (432) 682-3946
Reported:
09/07/05 13:55

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
BH-13 (5-6')	5102003-01	Soil	08/31/05 00:00	09/01/05 17:20
BH-13 (15-16')	5102003-03	Soil	08/31/05 00:00	09/01/05 17:20
BH-13 (25-26')	5102003-05	Soil	08/31/05 00:00	09/01/05 17:20
BH-13 (40-41')	5102003-07	Soil	08/31/05 00:00	09/01/05 17:20

Highlander Environmental Corp.
1910 N. Big Spring St.
Midland TX. 79705

Project: Pogo/ E.C. Hill T.B.
Project Number: 1746
Project Manager: Ike Tavarez

Fax: (432) 682-3946
Reported:
09/07/05 13:55

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
BH-13 (5-6') (5102003-01) Soil									
Benzene	ND	0.0250	mg/kg dry	25	E150606	09/06/05	09/06/05	EPA 8021B	
Toluene	ND	0.0250	"	"	"	"	"	"	
Ethylbenzene	ND	0.0250	"	"	"	"	"	"	
Xylene (p/m)	ND	0.0250	"	"	"	"	"	"	
Xylene (o)	ND	0.0250	"	"	"	"	"	"	
Surrogate: a,a,a-Trifluorotoluene		98.6 %	80-120		"	"	"	"	
Surrogate: 4-Bromofluorobenzene		100 %	80-120		"	"	"	"	
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	E150202	09/02/05	09/02/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		90.4 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		79.0 %	70-130		"	"	"	"	
BH-13 (15-16') (5102003-03) Soil									
Benzene	ND	0.0250	mg/kg dry	25	E150606	09/06/05	09/06/05	EPA 8021B	
Toluene	ND	0.0250	"	"	"	"	"	"	
Ethylbenzene	ND	0.0250	"	"	"	"	"	"	
Xylene (p/m)	ND	0.0250	"	"	"	"	"	"	
Xylene (o)	ND	0.0250	"	"	"	"	"	"	
Surrogate: a,a,a-Trifluorotoluene		102 %	80-120		"	"	"	"	
Surrogate: 4-Bromofluorobenzene		101 %	80-120		"	"	"	"	
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	E150202	09/02/05	09/02/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		93.8 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		78.0 %	70-130		"	"	"	"	
BH-13 (25-26') (5102003-05) Soil									
Benzene	ND	0.0250	mg/kg dry	25	E150606	09/06/05	09/06/05	EPA 8021B	
Toluene	ND	0.0250	"	"	"	"	"	"	
Ethylbenzene	ND	0.0250	"	"	"	"	"	"	
Xylene (p/m)	ND	0.0250	"	"	"	"	"	"	
Xylene (o)	ND	0.0250	"	"	"	"	"	"	
Surrogate: a,a,a-Trifluorotoluene		98.1 %	80-120		"	"	"	"	
Surrogate: 4-Bromofluorobenzene		93.3 %	80-120		"	"	"	"	
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	E150202	09/02/05	09/02/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	

Environmental Lab of Texas

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Page 2 of 9

Highlander Environmental Corp.
1910 N. Big Spring St.
Midland TX. 79705

Project: Pogo/ E.C. Hill T.B.
Project Number: 1746
Project Manager: Ike Tavarez

Fax: (432) 682-3946

Reported:
09/07/05 13:55

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
BII-13 (25-26') (5102003-05) Soil									
Surrogate: 1-Chlorooctane		90.6 %	70-130		E150202	09/02/05	09/02/05	EPA 8015M	
Surrogate: 1-Chlorooctadecane		81.0 %	70-130		"	"	"	"	
BII-13 (40-41') (5102003-07) Soil									
Benzene	ND	0.0250	mg/kg dry	25	E150606	09/06/05	09/06/05	EPA 8021B	
Toluene	ND	0.0250	"	"	"	"	"	"	
Ethylbenzene	ND	0.0250	"	"	"	"	"	"	
Xylene (p/m)	ND	0.0250	"	"	"	"	"	"	
Xylene (o)	ND	0.0250	"	"	"	"	"	"	
Surrogate: a,a,a-Trifluorotoluene		99.1 %	80-120		"	"	"	"	
Surrogate: 4-Bromofluorobenzene		99.1 %	80-120		"	"	"	"	
Gasoline Range Organics C6-C12	ND	10.0	mg/kg dry	1	E150202	09/02/05	09/02/05	EPA 8015M	
Diesel Range Organics >C12-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		90.8 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		78.0 %	70-130		"	"	"	"	

Environmental Lab of Texas

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Page 3 of 9

Highlander Environmental Corp.
1910 N. Big Spring St.
Midland TX. 79705

Project: Pogo/ E.C. Hill T.B.
Project Number: 1746
Project Manager: Ike Tavaréz

Fax: (432) 682-3946

Reported:
09/07/05 13:55

General Chemistry Parameters by EPA / Standard Methods
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
BH-13 (5-6') (5102003-01) Soil									
% Moisture	7.0	0.1	%	1	E150214	09/02/05	09/02/05	% calculation	
BH-13 (15-16') (5102003-03) Soil									
% Moisture	3.5	0.1	%	1	E150214	09/02/05	09/02/05	% calculation	
BH-13 (25-26') (5102003-05) Soil									
% Moisture	1.5	0.1	%	1	E150214	09/02/05	09/02/05	% calculation	
BH-13 (40-41') (5102003-07) Soil									
% Moisture	0.6	0.1	%	1	E150214	09/02/05	09/02/05	% calculation	

Environmental Lab of Texas

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Highlander Environmental Corp.
1910 N. Big Spring St.
Midland TX, 79705

Project: Pogo/ E.C. Hill T.B.
Project Number: 1746
Project Manager: Ike Tavarez

Fax: (432) 682-3946

Reported:
09/07/05 13:55

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch E150202 - Solvent Extraction (GC)

Blank (E150202-BLK1)

Prepared & Analyzed: 09/02/05

Gasoline Range Organics C6-C12	ND	10.0	mg/kg wet							
Diesel Range Organics >C12-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	46.2		mg/kg	50.0		92.4	70-130			
Surrogate: 1-Chlorooctadecane	50.0		"	50.0		100	70-130			

LCS (E150202-BS1)

Prepared & Analyzed: 09/02/05

Gasoline Range Organics C6-C12	402	10.0	mg/kg wet	500		80.4	75-125			
Diesel Range Organics >C12-C35	437	10.0	"	500		87.4	75-125			
Total Hydrocarbon C6-C35	839	10.0	"	1000		83.9	75-125			
Surrogate: 1-Chlorooctane	56.4		mg/kg	50.0		113	70-130			
Surrogate: 1-Chlorooctadecane	57.3		"	50.0		115	70-130			

Calibration Check (E150202-CCV1)

Prepared: 09/02/05 Analyzed: 09/03/05

Gasoline Range Organics C6-C12	431		mg/kg	500		86.2	80-120			
Diesel Range Organics >C12-C35	459		"	500		91.8	80-120			
Total Hydrocarbon C6-C35	890		"	1000		89.0	80-120			
Surrogate: 1-Chlorooctane	54.9		"	50.0		110	0-200			
Surrogate: 1-Chlorooctadecane	45.1		"	50.0		90.2	0-200			

Matrix Spike (E150202-MS1)

Source: 5102003-01

Prepared & Analyzed: 09/02/05

Gasoline Range Organics C6-C12	443	10.0	mg/kg dry	538	ND	82.3	75-125			
Diesel Range Organics >C12-C35	458	10.0	"	538	ND	85.1	75-125			
Total Hydrocarbon C6-C35	901	10.0	"	1080	ND	83.4	75-125			
Surrogate: 1-Chlorooctane	64.9		mg/kg	50.0		130	70-130			
Surrogate: 1-Chlorooctadecane	58.1		"	50.0		116	70-130			

Matrix Spike Dup (E150202-MSD1)

Source: 5102003-01

Prepared & Analyzed: 09/02/05

Gasoline Range Organics C6-C12	412	10.0	mg/kg dry	538	ND	76.6	75-125	7.25	20	
Diesel Range Organics >C12-C35	440	10.0	"	538	ND	81.8	75-125	4.01	20	
Total Hydrocarbon C6-C35	852	10.0	"	1080	ND	78.9	75-125	5.59	20	
Surrogate: 1-Chlorooctane	64.6		mg/kg	50.0		129	70-130			
Surrogate: 1-Chlorooctadecane	58.3		"	50.0		117	70-130			

Environmental Lab of Texas

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Highlander Environmental Corp.
1910 N Big Spring St.
Midland TX. 79705

Project: Pogo/ E.C. Hill T.B.
Project Number: 1746
Project Manager: Ike Tavarez

Fax: (432) 682-3946

Reported:
09/07/05 13:55

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	--------------------	-------	----------------	------------------	------	----------------	-----	--------------	-------

Batch EI50606 - EPA 5030C (GC)

Blank (EI50606-BLK1)

Prepared & Analyzed: 09/06/05

Benzene	ND	0.0250	mg/kg wet							
Toluene	ND	0.0250	"							
Ethylbenzene	ND	0.0250	"							
Xylene (p/m)	ND	0.0250	"							
Xylene (o)	ND	0.0250	"							
Surrogate: a,a,a-Trifluorotoluene	100		ug/kg	100		100	80-120			
Surrogate: 4-Bromofluorobenzene	93.3		"	100		93.3	80-120			

LCS (EI50606-BS1)

Prepared & Analyzed: 09/06/05

Benzene	114		ug/kg	100		114	80-120			
Toluene	112		"	100		112	80-120			
Ethylbenzene	118		"	100		118	80-120			
Xylene (p/m)	230		"	200		115	80-120			
Xylene (o)	119		"	100		119	80-120			
Surrogate: a,a,a-Trifluorotoluene	110		"	100		110	80-120			
Surrogate: 4-Bromofluorobenzene	105		"	100		105	80-120			

Calibration Check (EI50606-CCV1)

Prepared & Analyzed: 09/06/05

Benzene	118		ug/kg	100		118	80-120			
Toluene	108		"	100		108	80-120			
Ethylbenzene	113		"	100		113	80-120			
Xylene (p/m)	214		"	200		107	80-120			
Xylene (o)	114		"	100		114	80-120			
Surrogate: a,a,a-Trifluorotoluene	105		"	100		105	0-200			
Surrogate: 4-Bromofluorobenzene	95.7		"	100		95.7	0-200			

Matrix Spike (EI50606-MS1)

Source: 5106001-01

Prepared & Analyzed: 09/06/05

Benzene	2940		ug/kg	2500	ND	118	80-120			
Toluene	2860		"	2500	ND	114	80-120			
Ethylbenzene	2980		"	2500	ND	119	80-120			
Xylene (p/m)	5890		"	5000	734	103	80-120			
Xylene (o)	2940		"	2500	ND	118	80-120			
Surrogate: a,a,a-Trifluorotoluene	106		"	100		106	80-120			
Surrogate: 4-Bromofluorobenzene	119		"	100		119	80-120			

Environmental Lab of Texas

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Highlander Environmental Corp.
1910 N. Big Spring St.
Midland TX, 79705

Project: Pogo/ E.C. Hill T.B.
Project Number: 1746
Project Manager: Ike Tavarez

Fax: (432) 682-3946
Reported:
09/07/05 13:55

Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch E150606 - EPA 5030C (GC)

Matrix Spike Dup (E150606-MSD1)

Source: S106001-01

Prepared & Analyzed: 09/06/05

Benzene	2620		ug/kg	2500	ND	105	80-120	11.7	20	
Toluene	2590		"	2500	ND	104	80-120	9.17	20	
Ethylbenzene	2840		"	2500	ND	114	80-120	4.29	20	
Xylene (p/m)	5290		"	5000	734	91.1	80-120	12.3	20	
Xylene (o)	2870		"	2500	ND	115	80-120	2.58	20	
Surrogate: a,a,a-Trifluorotoluene	97.3		"	100		97.3	80-120			
Surrogate: 4-Bromofluorobenzene	102		"	100		102	80-120			

Environmental Lab of Texas

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Midland TX. 79705

Project: Pogo/ E.C. Hill T.B.
Project Number: 1746
Project Manager: Ike Tavaréz

Fax: (432) 682-3946
Reported:
09/07/05 13:55

General Chemistry Parameters by EPA / Standard Methods - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch E150214 - General Preparation (Prep)										
Blank (E150214-BLK1)				Prepared & Analyzed: 09/02/05						
% Solids	100		%							
Duplicate (E150214-DUP1)				Source: 5102001-02 Prepared & Analyzed: 09/02/05						
% Solids	94.4		%		94.3			0.106	20	

Environmental Lab of Texas

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Highlander Environmental Corp.
1910 N. Big Spring St.
Midland TX. 79705

Project: Pogo/ E.C. Hill T.B.
Project Number: 1746
Project Manager: Ike Tavaréz

Fax: (432) 682-3946
Reported:
09/07/05 13:55

Notes and Definitions

DET Analyte DETECTED
ND Analyte NOT DETECTED at or above the reporting limit
NR Not Reported
dry Sample results reported on a dry weight basis
RPD Relative Percent Difference
LCS Laboratory Control Spike
MS Matrix Spike
Dup Duplicate

Report Approved By:

Raland K Tuttle

Date:

9/7/2005

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer

Jeanne Mc Murrey, Inorg. Tech Director
LaTasha Cornish, Chemist
Sandra Sanchez, Lab Tech.

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If you have received this material in error, please notify us immediately at 432-563-1800.

Environmental Lab of Texas

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HIGHLANDER ENVIRONMENTAL CORP.

(432) 682-4559

Fax (452) 682-3946

PROJECT NO.: 1746	PROJECT NAME: Pogo/F.C. Hill to Side.
-------------------	---------------------------------------

LAB ID.	DATE	TIME	REMARKS	SAMPLE IDENTIFICATION
				Loc. Co. 2000.

LAB I.D. NUMBER	DATE	TIME
100-10000		

[illegible]

02	1	5	-BH-13	(10-11)
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03	S	BH-13	(15-16)
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12-04	5	1	BH-13 (20-21)
12-05	5	1	

3	1	BA-13	(25-26)
2	5	BA-13	(25-26)

207	✓	BH-13 (40441)	BH-13 30-31/1
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[illegible][illegible]

RECEIVED
DATE: 7-2-68
SIGNATURE: [Signature]

RECEIVED BY: (Signature) _____
 Date: _____
 Time: _____

RELINQUISHED BY: (Signature)	Date: _____ Time: _____	RECEIVED BY: _____
------------------------------	----------------------------	--------------------

ADDRESS: _____
 RECEIVING LABORATORY: _____
 CITY: _____ STATE: _____ ZIP: _____
 PHONE: _____
 CONTACT: _____
 DATE: _____

SAMPLE NO.	MATRIX:
A-Allyl St-Stall	H-Water S-Soil

File # 62-10487
Please fill out all copies - Laboratory retains yellow copy - Return original

1900

PAGE: / OF:
ANALYSIS REQUEST
(Circle or Specify Method No.)

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Environmental Lab of Texas

Variance / Corrective Action Report – Sample Log-In

Client: Highlander

Date/Time: 09-01-05 @ 1720

Order #: 5102003

Initials: JMM

Sample Receipt Checklist

Temperature of container/cooler?	☒ Yes	☐ No	5.5	C
Shipping container/cooler in good condition?	☒ Yes	☐ No		
Custody Seals intact on shipping container/cooler?	☒ Yes	☐ No	☒ Not present	
Custody Seals intact on sample bottles?	☒ Yes	☐ No	☒ Not present	
Chain of custody present?	☒ Yes	☐ No		
Sample Instructions complete on Chain of Custody?	☒ Yes	☐ No		
Chain of Custody signed when relinquished and received?	☒ Yes	☐ No		
Chain of custody agrees with sample label(s)	☒ Yes	☐ No		
Container labels legible and intact?	☒ Yes	☐ No		
Sample Matrix and properties same as on chain of custody?	☒ Yes	☐ No		
Samples in proper container/bottle?	☒ Yes	☐ No		
Samples properly preserved?	☒ Yes	☐ No		
Sample bottles intact?	☒ Yes	☐ No		
Preservations documented on Chain of Custody?	☒ Yes	☐ No		
Containers documented on Chain of Custody?	☒ Yes	☐ No		
Sufficient sample amount for indicated test?	☒ Yes	☐ No		
All samples received within sufficient hold time?	☒ Yes	☐ No		
VOC samples have zero headspace?	☒ Yes	☐ No	Not Applicable	

Other observations:

Variance Documentation:

Contact Person: _____ Date/Time: _____ Contacted by: _____
Regarding: _____

Corrective Action Taken:
