2R - 43

GENERAL CORRESPONDENCE

YEAR(S):

2007 - 2001

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Friday, December 07, 2007 2:50 PM
To: 'Weathers, Stephen W'
Cc: Price, Wayne, EMNRD; Johnson, Larry, EMNRD
Subject: DCP Midstream PCA Junction Compressor Station

Mr. Weathers:

The OCD has completed a review of past reports and the most recent DCP Midstream correspondence dated June 11, 2007. The OCD comments and recommendations are as follows:

1) A free-product recovery or treatment system is required at or in the vicinity of MW-1 to address FPHs. The thickness of free product has exceeded one foot.
2) A MW is recommended between MWs 2 and 5 to monitor an area where dissolved phase BTEX may be bypassing the existing monitor well array.

Please contact me if you have questions. Thank you.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3491
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/index.htm
(Pollution Prevention Guidance is under "Publications")

370 17th Street, Suite 2500
Denver, Colorado 80202
303-595-3331 – main
303-605-1957 – fax

October 15, 2007

Mr. Wayne Price
Remediation Bureau Chief
New Mexico Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, NM 87505

RE: 2007 Second Quarter Groundwater Monitoring Report for the PCA Junction Compressor Station Eddy County, New Mexico SW ¼ Section 11, Township 20 South, Range 30 East (NM Meridian)

Dear Mr. Price:

DCP Midstream, LP (DCP) is submitting the second quarter 2007 groundwater monitoring report for the referenced site.

Groundwater monitoring activities were completed June 18, 2007. Phase-separated hydrocarbons are present in MW01. Benzene was also detected in MWA01 at 18 ug/l. The next groundwater monitoring event was scheduled in the third quarter of 2007.

If you have any questions regarding this report, please call me at 303-605-1893.

Sincerely,

DCP Midstream, LP

Daniel Dick
Environmental Engineer

Enclosure

cc: Larry Johnson, OCD District I, Hobbs
Kelly Ruder, Arcadis
Environmental Files

370 17th Street, Suite 2500
Denver, Colorado 80202
303-595-3331 – main
303-605-1957 – fax

June 11, 2007

Mr. Wayne Price
Remediation Bureau Chief
New Mexico Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, NM 87505

RE: 2007 First Quarter Groundwater Monitoring Report for the PCA Junction Compressor Station Eddy County, New Mexico SW ¼ Section 11, Township 20 South, Range 30 East (NM Meridian)

Dear Mr. Price:

DCP Midstream, LP (DCP) is submitting the first quarter 2007 groundwater monitoring report for the referenced site.

Groundwater monitoring activities were completed March 27, 2007. Phase-separated hydrocarbons are present in MW01. Benzene was also detected in MWA01 at 21 ug/l. The next groundwater monitoring event is scheduled for the second quarter of 2007.

If you have any questions regarding this report, please call me at 303-605-1893.

Sincerely,

DCP Midstream, LP

MW-01
< Free product Recovery System needed,
– MW 1 MW 2 & 5

Daniel Dick
Environmental Engineer

Enclosure

cc: Environmental Files

370 17th Street, Suite 2500
Denver, Colorado 80202
303-595-3331 – main
303-605-1957 – fax

June 8, 2007

Mr. Wayne Price
Remediation Bureau Chief
New Mexico Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, NM 87505

RE: 2006 Quarterly Groundwater Monitoring Reports for the PCA Junction Compressor Station Eddy County, New Mexico SW ¼ Section 11, Township 20 South, Range 30 East (NM Meridian)

Dear Mr. Price:

DCP Midstream, LP (DCP) is submitting three quarterly reports for the referenced site. These three reports are provided to complete your 2006 files, as agreed in our meeting on February 1, 2007. You will notice the absence of a Q2 report for the PCA Compressor Station: a sampling event was not scheduled during that quarter.

The PCA Junction Compressor Station first quarter 2007 Groundwater Monitoring Report is being submitted to you under separate cover.

If you have any questions regarding this report, please call me at 303-605-1893.

Sincerely,

DCP Midstream, LP

Daniel Dick
Environmental Engineer

Enclosure

cc: Environmental Files

OCD DCP Midstream LP. Sites Discussion Meeting
(Stephen Weathers, Daniel Dick, et. al) February 1, 2007

GPM Artesia GP (GW-23)

On 5/26/2006, Stephen Weathers PG 303-605-1718 (swweathers@duke-energy.com) submitted a Flare Pit Soil Remediation & Closure Work plan by Conestoga-Rovers & Assoc. to Mike Bratcher. Upon your approval, DEFS will move forward w/ the closure activities. One hard copy of the work plan will also be mailed next week (OCD Santa Fe never received it).

Stephen Weathers, et al. will present the info. during the 1/31/2007 meeting in Santa Fe.

Lee Compressor Station (GW-227) (Also known as the Gillespie/Feagan)
A-24-T17 S 35 E

Closure work plan dated 9/5/2006 mailed to Ben Stone to complete a site closure.

The work plan was develop. Based on DEFS decision to cancel the discharge plan GW-227 and close the site. The closure plan is submitted to the OCD for approval.

Closure Activities: DEFS will remove all remaining equip. from site. The site will be visually inspected to determine if hydrocarb. impacted soil is present at the site. If no HC impacted soils are encountered, the site will be leveled and reseeded with native grass. If HC impacted soils are encountered, the impact soil will be remediated following NMOCD Guidelines for Remed. of Leaks, Spills, & Releases, 8/1993 and using: Benz (10 ppm), BTEX (50 ppm), and TPH (100 ppm). A PID might be used to screen potential HC impacted soil. If headspace is <= 100 ppm, the PID reading will be used as a substitute to lab analysis for benz./BTEX. If the PID is not used for screening confirm. soil samples will be analyzed for BTEX using EPA 8021B.

HC impact soils that are found to be greater than cleanup criteria will be excavated and properly disposed at an NMOCD approved facility. Confirmation soil samples will then be collected within the base and sidewalls of the excavation to confirm that the HC impacted soils have been removed to below the NMOCD cleanup stds. for this site.

After confirmation soil samples confirm the impacted soils has been removed to below the NMOCD cleanup Stds., the excavation will be backfilled with clean fill mtl. and the area reseeded w/ native grass. A closure report will be completed summarizing all field activities and analytical results. The closure report will also request that no further action will be needed at this site. Upon approval of this work plan, field activities will be scheduled. A 48 hr. notice will be given to the NMOCD Hobbs DO informing them of the start up of the field activities.

LEE GP (GW-2)

Dick Daniel (DIDick@dcpmidstream.com)

Received Q4 2006 GW Monitor Rpt. On 1/30/07 w/ recommendations for certain activities, i.e., free-product recovery in MWs 5 and 15 w/ restart analysis on MW-8 recommended.

Expired DP and OCD msg. to Ruth Lang on 12/21/06: the Lee Compressor Station (GW-227) correspondence dated 12/28/06 indicates that the facility will remain inactive and follow the closure plan to permanently close the facility. Upon receipt of the closure plan info. and verification that contamination exists at the facility with some photos to display what the site currently looks like, the OCD may close the DP?

DUKE LINAM RANCH GP (GW-15)

Third Qtr. 2006 GW Monitoring Report dated January 30, 2007.

GW conditions remain stable. Next monitor event is scheduled for first qtr. 2007. Next annual report for site will be prepared following completion of first qtr. 2007 monitor activities.

On 11/1/2006 Dick Daniel (didick@duke-energy.com) submitted the Annual GW Rpt. 2005-2006. The summary rpt. for Q3 2005 and Q1 2006 GW sampling event. The data indicate that GW conditions remain stable. The next monitor event was performed in 9/2006. The next annual rpt. for the site will be prepared following the completion of the Q1 2007 monitor activities & review & validation of the analytical results. The water tables rose substantially more in MW-1 and 2 than in MW-3, 7 & 9. MW-1 & 2 are located in or adjacent to a natural drainage swale that has been blocked in the S part of site to produce an internally drained condition. The other 3 wells are outside of this area. Unusually high precip in 2004-2005 resulted in more GW mounding beneath the closed drain swale than the rest of the site. The water table in MWs 1 & 2 began to recede after the precip. patterns returned to normal. Water tables in the other 3 wells continue to rise suggesting a more dampened relationship between the precipitation and resulting chgs. in the water table elevations.

MW-7 was not included in the piezometer maps. The level in MW-7 was not included in these maps. Including this well results in a water-table configuration that suggests radial flow from the center of the property. MW-7 has never contained measurable BTEX. This suggests the relatively higher water table in the central part of site is localized so contours should not be carried to the NW. FPH thick measurements for 9/29/2005 (MW-4=0.68 in & MW-6=4.23 in.) and 3/22/2006 (MW-4=0.76 & MW-6=3.69 in.). Only MWs 10 & 10D exceeded BTEX Stds. Any dissolved phase BTEX that emanate from FPH at MW-4 & MW-6 attenuate to below the method reporting limits before migrating to the vicinity of MW-1 (cross gradient) or MW-8 (down gradient). BTEX measured at MW-10 and 10D attenuate to concentrations that are slightly above MW-9 or below the reporting limits (MW-12 & 13) at the interior down gradient wells. The above have remained constant since ~ 6/2001. This indicates that BTEX distribution and attenuating mechanism that controls it are equilibrated.

The affected areas are min. of 1,000 ft. from the nearest down gradient property boundary. Wells containing FPH are in an active gas processing area so the safety risks inherent to restarting FPH collection more than offsets the environmental benefits that would be associated with the activity. The data establishes that dissolved phase releases from the FPH that is present in this area are attenuated approx. 1,000 ft. from the nearest down-gradient property boundary. The next semi-annual GW monitor event is scheduled for the Q3 2006. Contact Michael Stewart PE 303-948-7733 if you have questions.

HOBBS BOOSTER CS (GW-44)

Project Summary: Hobbs Booster Station, (Discharge Plan GW-044)
(Units C and D, Section 4, Township 19 South, Range 38 East)

Summary date: October 10, 2006

Project history:

DEFS inherited Hobbs Booster Station (Former Gas Plant) when it acquired the assets of GPM. Site investigation activities began in July 1999. Plume delineation was completed in June 2003.

Two remediation systems are present at the site. An air sparge system was installed in January 2004 to control cross-gradient off site migration of dissolved phase hydrocarbons. It has operated on a near continual basis except for a couple of periods when it was under repair, and the groundwater data verifies that it is controlling off-site migration.

A free phase hydrocarbon (FPH) collection system became operational in January 2005 in the center of the site. It has operated on a regular schedule except for a couple of brief periods when it was down for repairs. The system has effectively remove FPH since it was started. The system is inspected and maintained on a regular basis DEFS is currently evaluating the potential of adding vacuum to the system to increase the production rate and capture zone of each well.

Current Project Status:

The hydrocarbon plume has been delineated to below the method detection limits. There is no evidence of plume expansion. Operation of the air sparge system is necessary to control dissolved-phase hydrocarbon releases to the south. FPH collection will continue indefinitely.

Detection level Groundwater monitoring continues at the site on a quarterly basis. Operation of the air sparge and the FPH collection system will continue indefinitely.

On 12/17/06 Michael Stewart & Steve Weathers notified OCD that Trident Environmental will conduct quarterly monitor well gauging & GW sampling and the following: SWLs in MW, RW and temp. wells using an oil/water interface problem; Collect GW samples for BTEX w/ QA/QC; Purge water disposed at NMOCD approved facility. Project site location: 1625 W. Marland, Hobbs (C&D 4-19S-36E). Sampling will begin on 12/20/06.

On 10/30/06, Stephen Weathers 303-605-1718 (swweathers@duke-energy.com) submitted additional vacuum enhancement testing for the free phase hydrocarbon extraction system located at C&D 4-19S-38E. DEFS would like to complete this test early next week. Upon completion of the field activities DEFS will complete an assessment report summarizing the results of the test.

The AEC 10/30/06 summary of initial assessment activities & recom. for further evaluation of adding vacuum enhancement to the free phase hydrocarbon extraction system. Depth (BTOC) is about 50 feet. The above SWL indicate that recent heavy rains have not affected the water table in a fashion similar to 2004 precip. This fact is important because the WT historically declined at a rate of about 1 ft/yr. this trend should continue to expose more of the screened interval in these wells to make them available to vacuum effects.

FPH thickness ranges from about 0.43 in. to 10.63 in. in TW-C, OW-25W & 50W, OW-100W, OW-25S, OW-50S, OW-25 E & OW-25 N. There is a gravel interval at about 34 to 64 feet BGL.

On 10/23/2006, Stephen Weathers 4-303-605-1718 (swweathers@duke-energy.com) submitted an electronic copy of the 2005-2006 Annual GW Monitor Rpt. along w/ a cover letter.

The report is missing & OCD should request another copy.

DUKE APEX CS (GW-163)

old conoco

Trisha Elizondo (ARCADIS) (Trisha.elizondo@arcadis-us.com)

On 1/17/07, notification that ARCADIS will be conducting mo. Product recovery and PCA Junction on 1/22-23/07. Routine product recovery is on-going at site through hand-bailing. MWs at 2 locations will be surveyed to help w/ GW flow & potentiometric surface.

DUKE HOBBS GP (GW-175)

old conoco
Stephen Weathers (SWWeathers@dcpmidstream.com)

Project Summary: Hobbs Gas Plant
Unit G, Section 36 Township 18 South, Range 36 East

Summary date: October 10, 2006

Project history:

DEFS acquired the Hobbs Gas Plant in March of 2004. Ground water monitoring wells (6 wells) were installed at the site during the due diligence phase of the acquisition. Benzene was identified above the WQCC standards in one of the groundwater monitoring wells.

Current Project Status:

Groundwater monitoring continues at the site on a quarterly basis.

On 1/29/07, 4Q 2006 GW monitor rpt. submitted. Two MWs exhibit elevated benzene levels. SE and E-central portions of site adjacent to process equip. Qtly sampling continues. Results of Q1 2007 sampling will be reported in A1 2007 GW monitor report. Potentiometric surface maps for site in future reports can be expected.

Remediation Sites

C-line Release Site (1RP-401-0)

Project Summary: C-line Release site (1RP-401-0)
(Unit O, Section 31, Township 19 South, Range 37 East)

Summary date: October 10, 2006

Project history: Pipeline Release

Duke Energy Field Services C-Line Pipeline Release occurred in May of 2002. The release occurred on New Mexico State Land. Environmental Plus, Inc. was contracted to complete the soil remediation. Approximately 3,868 cubic yards of impacted soil was excavated. 2,707 cubic yards of impacted soils was properly disposed and the remaining impacted soil was blended/shredded until below cleanup standards and placed back into the excavation. During the soil remediation, groundwater was determined to be impacted with hydrocarbons. The groundwater characterization activities began in fourth quarter 2002. A total of 9 groundwater monitor wells were installed. Active free phase hydrocarbon (FPH) removal initiated in November 2003. A soil vapor extraction system was installed in October 2004. The system was expanded to include a second well in June 2005. No FPH has been measured since March 2006 even after the SVE system was turned off (but remains at the site) in June 2006.

Current Project Status:

All FPH has been removed as discussed above. The hydrocarbon plume has been delineated. There is no evidence of plume expansion, and, in fact, the plume may actually be contracting.

Groundwater monitoring continues at the site on a quarterly basis. Site monitoring could be decreased to semi-annual.

Received Q3 2006 GW monitor rpt. from Stephen Weathers on 12/18/06.

Eldridge Ranch (AP-33)

Stephen Weathers (SWWeathers@dcpmidstream.com)

Project Summary: Eldridge Ranch, (Abatement Plan AP-33)
(Unit P, Section 21, Township 19 South, Range 37 East)

Summary date: October 10, 2006

Project history: Pipeline Release

DEFS initiated investigative activities in June 2002 following notification by NMOCD. Site characterization activities were largely completed by the fourth quarter of 2003. The boundaries of detectable hydrocarbons have been delineated.

DEFS submitted the Stage 1 Abatement Site Investigation Report (ASIR) on February 11, 2004 to the New Mexico Oil Conservation Division (OCD). In the ASIR, DEFS committed to continuing two activities (groundwater monitoring and free phase hydrocarbon (FPH) removal) independent of the ASIR review timeframe. The OCD has not commented on the ASIR. Groundwater monitoring and FPH removal activities continue on a regular basis.

Current Project Status:

FPH recovery has been attempted at the site with limited results. The FPH at the site is generally limited in thickness to less than one foot. In addition, the FPH appears to be relatively immobile based upon the inability of the automatic collection systems to collect the liquids.

The hydrocarbon plume has been delineated to below the method detection limits. There is no evidence of plume expansion; however, concentrations the interior of the plume appears to exhibit nominal increases and decrease in response to seasonal precipitation.

Groundwater monitoring continues at the site on a quarterly basis. Site monitoring could be decreased to semi-annual without jeopardizing environmental impacts. FPH removal continues as site conditions warrant.

On 1/26/07, received Q4 2006 GW monitor rpt. for AP-33 near Monument NM. Some conclusions: FPH mobility appears to be limited based on historic bail down/recovery tests and failure to reappear; FPH thick is less than 0.8 ft. in six wells and less than 0.1 ft in 2 of 6 wells. FPH is relatively immobile at thick less than 1 ft. FH continues to decline in MW-EE from max. thick. of 0.83 ft. in 9/2005. FPH thick in other wells (excepting MW-CC) also exhibit decreasing trends. Benzene horiz. distrib. remain unchanged over duration of project. The benz level in the former house well continues to remain below NM WQCC GW std. Summer 2006 rains did not create a spike in levels at MWs like the heavy 2004-2005 rains. No evidence of plume expansion exists ; thus, natural attenuation stabilizes and removes hydrocarbs as they migrate away from area.

AEC recommends that Q1 2007 monitoring be completed and data reviewed to evaluate changes in GW flow patterns in S-central part of study area.

On 12/22/06, received Q3 2006 GW monitor report conclusions: FPH remains in 4 wells in W-central part of study area. FPH thick decrease in 3 of 4 wells. FPH present to N in MW-EE at 0.35 ft. FPH continues to decline from max thick of 0.83 ft. in 9/2005. FPH was not measured anywhwere else within study area. FPH mobility appears to be limited based on historic bail down/recovery tests and its failure to reappear in previously affected wells to S. Benz distrib. unchg. over duration of project. Temporal benz distrib. - see charts.

On 10/24/06, Stephen Weathers 303-605-1718 (swweathers@duke-energy.com) submitted GW monitor rpt. for Q2 2006. The former NMG-148C Study Area was combined with the Eldridge Ranch Study Area beginning w/ the Q1 2006. The areas were combined after estab. that hydrocarb plume orig. from NMG-148C had migrated into the Eldridge Ranch Study Area before it attenuated. The combined sites will be treated as a single entity in all subsequent sample events. Activities are governed under AP-33. DEFS submitted the Stage 1 Abatement Site Investigation Rpt. (ASIR) on 2/11/2004 to the OCD. In that rpt., DEFS is committed to continuing 2 activities independ. of the ASIR review timeframe. The activities include GW monitor. & free phase hydrocarb. (FPH) removal when practicable.

GW Monitor activities were completed on 6/19 and 20, 2006 abiding by the OCD approved SAP. SWLs, FPH tick measurements, and GW sampling were completed (see report). The conclusions were: The interpretations are grouped accord. to GW flow, product thick and GW chemistry. 6/2006: data from newly installed MW-28-31 continues to indicate that GW flow beneath the northern part of the Huston property is southward rather than toward the SE.

The WT continues to decline at a uniform rate across the site from a high in 12/2004. The vertical gradient measured between MWs 1s & 1d has not varied substantially over the duration of the project.

Conclusions are: FPH is present in 5 MWs in the w-central part of the study area. The FPH mobility appears to be limited based upon historic bail down/recovery tests & its failure to reappear in previously affected wells to the S. FPH was also present to the N in MW-EE at 0.35 ft. FPH has now declined from a max. thick of 0.83 ft. in 9/2005. FPH was not measured anywhere else within the study area. The Benz distribution has remained essentially unchg. over the duration of the project. MWs 28, 30 & 31 installed in 3/2006 did not contain detectable concentrations of BTEX constituents when they were sampled a second time. MW-29 has detected BTEX. The northernmost NMG-148C plume and moves south. The pattern indicates that the areal extent of the dissolved phase plume assoc. w/ NMG release is not expanding.

The concern. in MW-e & MW-1 located in the S part of this area continue to decline. Samples from the other 4 wells (MW-M, O, Q & M) produced concentrations that were at or slightly higher than the 3/2006 values. This indicates that the S part of the dissolved phase plume in this area appears to be contracting to the N while the remainder of the plume in this area remains constant. None of the data indicates that the plume is expanding.

Benz time concent. for the wells located immed. adjacent to MW-1 or on the Eldridge property (irrigation wells, house well) are shown in Fig. 9. The concentrations in MW-1 and the irrig. well leveled out after an apprec. 1-yr decline. The concent. in the house well has remained consistent over the past 3 sample events. The pattern does not indicate that the dissolved phase plume is expanding in this area. Wells MW-A, 4 & 5 located N of the Huston-Eldridge boundary, remained relatively consistent.

All of the above relationships indicate that natural attenuation is stabilizing & removing hydrocarbs as they migrate away form the src. areas. There is no evidence of plume expansion.

Recommendations:

AEC recommends that a Q3 monitoring be completed and evaluated. The monitor freq. should then be decreased from qtly. to semi-annual if the data results do not vary appreciably. The potential for FPH removal will be evaluated based upon info. gathered during the Q3 monitor event. Recommendations on FPH will be provided as necessary separate from the monitor report. Michael Stewart PE (303-948-7733).

J-4-2 Release Site

Project Summary: J-4-2 Release Site
Unit C, Section 27 Township 19 South, Range 35 East

Summary date: October 10, 2006

Project history: Pipeline Leak

The release at this site was discovered in August 2005. EPI completed a limited soil cleanup and preliminary groundwater investigations between August 2005 and the first quarter of 2006.

A work plan proposing additional site characterization activities was submitted to the NMOCD. The site activities were completed in September 2006 and a report is currently being generated.

Current Project Status:

Preliminary evaluation of the data indicates that the groundwater plume has been defined beyond the limit of detectable concentrations. Additional activities will be proposed as necessary in the pending investigative report.

On 12/28/06, Stephen Weathers e-mailed a AEC Consultants site investigation rpt. (12/26/07). Water table elevations rose by 0.45 to 1 ft. FPH thickness in MW-2 declined from 0.57 to 0.15 between 2/06 and 9/06. Probably due to high precip. summer 2006. I~ 0.006 toward SE. Head at MW-2 slightly higher than at other wells. K~ 90 ft/day based on pump test. n! 0.15. Estimated GW velocity !3.6 ft/day or 1,310 ft/yr. All develop. and purge water was disposed of at the Linam Ranch facility by EPI. All cuttings generated during the drilling process will be stockpiled

and sampled and then disposed of in an appropriate fashion. Unaffected cuttings will be spread thin.

Final field activity completed was to measure physical properties of saturated mtls. Slug tests were completed on all wells that don't contain FPH to estim. saturated K.

Following recommendations from AEC (Michael Stewart 303-948-7733):

A passive bailer should be installed in MW-2 to attempt to remove mobile FPH. GW monitoring should be completed 3 more times on a qtly. basis to compile a data base based upon 4 seasons of measurements; Qtly repts should be generated based upon the results of the 4th qtr. 2006 and Q1 2007 monitor events; A comprehensive report will be compiled follow. completion of Q2 2007 monitor episode. This report. include recom. of both long-term monitor and , if necessary, implementation of active remediation; Additional charact. activities & active remediation activities will not be completed during this time interval unless data indicates hydrocarb. plume is expanding; the next GW monitor event is scheduled fro the Q4 2006.

On 12/20/06, John Furgerson (jmfergerson@grandecom.net) sent msg. that Trident Environ. a subcontractor of Duke's will be conducting monitor well gauging & GW sampling at 1300 MST Thursday, Dec. 21, 2006. They will measure SWLs in all MWs using an oil/water interface probe; purge non-product MW/RWs. Collect GW samples for BTEX; ship samples using COC protocol; and purge water will be disposed at a NMOCD approved facility.

X-line Site (1RP-400)

Project Summary: X line Release Site (1RP-400)
Unit B, Section 7 Township 15 South, Range 34 East

Summary date: October 10, 2006

Project history: Pipeline Release

The release at this site was discovered in January 2002. EPI completed soil cleanup and preliminary groundwater investigations the first quarter of 2002. A preliminary groundwater investigation was completed in May 2002.

The following remediation components were installed at the site:

· A free phase hydrocarbon (FPH) removal system was installed in MW-8 in July 2003. The system continued to function until the mobile FPH was removed.

· An air sparge (AS) system became operational in June 2003. The system was operated until hydrocarbon concentrations in the wells (except for the FPH collection well) were all measured below the method detection limits.

· A soil vapor extraction (SVE) system was also installed in June 2003. The SVE system operated regularly until August 2006. No FPH was present in the extraction well in September 2006.

Quarterly monitoring is completed at the site. The last monitoring episode was conducted in September 2006.

Current Project Status:

A report detailing the September 2006 activities at this site will be prepared when the analytical data is received and verified.

DEFS will evaluate the feasibility of initiating air sparge in the FPH recovery well to complete source recovery provided no additional FPH is measured in the well.

Received 4th qtr 2006 GW monitor report for pipeline release on January 30, 2007.

Received Q3 2006 GW monitor report from Stephen Weathers 303-605-1718)) for pipeline release on 12/18/06. X-Line pipeline release on the Etcheverry Ranch at 33 deg 02 min 11 sec, 103 deg 32 min 48 sec. MWs 1 through 8 sampled. SWLs reassured. Unfiltered samples were collected for BTEX. MW-8 is not included in hydrograph because casing elev. has not been established (see report for conclusions, etc.).

On 9/8/2006, Stephen Weathers (swweathers@duke-energy.com) sent Ben Stone the Q2 2006 GW monitor report located on the Etcheverry Ranch near Lovington, NM.

The report is missing and OCD needs another copy.

RR Ext, (AP-55)

Project Summary: RR Ext, (Abatement Plan AP-55)
Unit C, Section 19 Township 20 South, Range 37 East

Summary date: October 10, 2006

Project history:

DEFS initiated cleanup activities after a December 13, 2005 release. The spill was remediated, and a temporary well was drilled to groundwater during the first quarter of 2006. A sample from the well contained dissolved-phase hydrocarbons.

The NMOCD assigned the site an abatement plan number based upon the groundwater sample. A Stage 1 Abatement Plan Proposal was submitted to the NMOCD on or about May 26, 2006.

Current Project Status:

DEFS is waiting for approval for the Stage 1 Abatement Plan Proposal. DEFS will initiate the required activities following receipt of that approval

PCA Junction

Trisha Elizondo (ARCADIS) (Trisha.elizondo@arcadis-us.com)

On 1/17/07, notification that ARCADIS will be conducting mo. Product recovery and PCA Junction on 1/22-23/07. Routine product recovery is on going at site through hand bailing. MWs at 2 locations will be surveyed to help w/ GW flow & potentiometric surface.

Monument Booster Station (Gas Compression Facility)

Q3 2006 GW Monitor activities completed on 9/20/06 & submitted 1/30/07. Next monitor event Q1 2007. Next annual rpt. Prepared following completion of Q1 2007.
No measurable free-product was detected in any MWs. However, in the submittal is shows MWs 1 and 5 have free product at 1.6 and 0.55 inches? No BTEX detected in down-gradient boundary wells MW-3 and 4. No BTEX in up gradient MWs 1D and 2. MW-6 showed anomalously high levels of BEX. Will keep in mind next sample event for continuing trend.

On 11/1/2006, Daniel Dick 303-605-1893 (didick@duke-energy.com) submitted Annual GW Monitor Rpt. 2005-2006. A copy of the summary report for Q3 2005 and Q1 2006 GW sampling effort. Data indicates that the GW conditions remain stable. The next monitor episode was performed 9/2006. The next annual report for the site will be prepared following the completion of the Q1 2007 monitor activities & review & validation of he analytical results. FPH thick measurements on 3/16/06 for period since passive FPH collectors were removed at MW-1 (0.37 in.) and MW-5 (0.39). FPH thick may be declining in MW-1 and is stable at MW-5. None of the BTEX constituents were detected in downgrade boundary wells MW-3 and MW-4. BTEX was also not detected in upgrade wells MW-1D & 2. Hydrocarbs were detected in MW-7, but benz was only constituent above WQCC Stds. No sample has exceeded the WQCC Stds for TEX. Only MW-7 samples have exceeded for benz. Since 2/2000. Benz detection sporadic in all wells except MW-7 since 2/2000. BTX concentrations in MW-7 continue to fluctuate.

Further src. control activities should be postponed given the decreasing product thick in MW-1. The Next semi-annual gw monitor event is scheduled for Q3 2006. Reporting will continue on an annual basis unless unusual conditions warrant notification after the Q3 sampling event.

Attachment: DCP Midstream LP Related Facilities

Application No.	Application Type	Order No. (ex., GW-##)	Applicant	Facility	Environmental Permit Status	Rcvd	Order	Exp	legal	County	Reviewer	District	IssuingOff	Notes	Cleanup Status
pENV000GW0 0154	Discharge Plan Permit	143	DCP MIDSTREAM L.P.	DUKE CAL-MON CS	A	03/29/1993	05/14/1993	05/14/2008	J-35-23 S-31 E	Eddy	Chavez	Artesia	Santa Fe		
pENV000GW0 0242	Discharge Plan Permit	227	DCP MIDSTREAM L.P.	LG&E HADSON GILLESPIE/F EAGAN CS	I		12/28/1995	12/28/2005	A-24-17 S-35 E	Lea	Chavez	Hobbs	Santa Fe		
pENV000GW0 0331	Discharge Plan Permit	316	DCP MIDSTREAM L.P.	DUKE PAIGE CS	A	08/17/1999	01/06/2000	01/06/2005	O-4-21 S-32 E	Lea	Chavez	Hobbs	Santa Fe		
pENV000GW0 0326	Discharge Plan Permit	311	DCP MIDSTREAM L.P.	RAPTOR COTTON DRAW	A	01/15/1999	01/06/2000	01/06/2005	C-18-25 S-32 E	Lea	Chavez	Hobbs	Santa Fe		
pENV000GW0 0187	Discharge Plan Permit	176	DCP MIDSTREAM L.P.	DUKE BOOTLEG CS	A	10/27/1994	01/20/1995	01/20/2005	J-18-22 S-33 E	Lea	Chavez	Hobbs	Santa Fe		
pENV000GW0 0163	Discharge Plan Permit	152	DCP MIDSTREAM L.P.	DUKE WHITE CITY C.S.	C		12/13/1993		-10-24 S-26 E	Eddy	Chavez	Artesia	Santa Fe	Site is shut down-Llano to submit closure	
pENV000GW0 0228	Discharge Plan Permit	213	DCP MIDSTREAM L.P.	DUKE STRATA CS	A	07/18/1995	08/30/1995	08/30/2000	A-22-23 S-34 E	Lea	Chavez	Hobbs	Santa Fe	closure requested need picture and TPH analysis	
pENV000GW0 0156	Discharge Plan Permit	145	DCP MIDSTREAM L.P.	DUKE ZIA GAS PLANT & ZIA BOOSTER STATION	A		07/06/1993	07/06/2008	A-19-19 S-32 E	Lea	Chavez	Hobbs	Santa Fe	3 below grade tanks registered	
pENV000GW0 0303	Discharge Plan Permit	288	DCP MIDSTREAM L.P.	DUKE PARDUE CS	A	10/06/1997	11/24/1997	11/24/2007	J-10-23 S-28 E	Eddy	Chavez	Artesia	Santa Fe	need $400 fee + sign-off	
pENV000GW0 0178	Discharge Plan Permit	167	DCP MIDSTREAM L.P.	DUKE P & P Malaga CS	A	05/19/1994	07/25/1994	07/25/2004	G-3-24 S-28 E	Eddy	Chavez	Artesia	Santa Fe	need sign-offs	
pENV000GW0 0173	Discharge Plan Permit	162	DCP MIDSTREAM L.P.	DUKE ANTELOPE RIDGE GP	A	01/21/1994	04/04/1994	03/23/2004	O-15-23 S-34 E	Lea	Chavez	Hobbs	Santa Fe	rec DP App + $100 issued PN and Draft DP 1/23/04	
pENV000GW0 0171	Discharge Plan Permit	160	DCP MIDSTREAM L.P.	DUKE BRIGHTM FED CS	C	11/29/1993	01/14/1994		C-21-19 S-33 E	Lea	Chavez	Hobbs	Santa Fe	DP terminated 1/22/04	
pENV000GW0 0161	Discharge Plan Permit	150	DCP MIDSTREAM L.P.	DUKE PURE GOLD "28" CS	A		11/22/1993	11/22/2003	D-28-23 S-31 E	Lea	Chavez	Hobbs	Santa Fe	Rec DP application + $100 issued PN 1/23/04 & Draft DP	
pENV000GW0 0311	Discharge Plan Permit	296	DCP MIDSTREAM L.P.	DUKE CEDAR CANYON CS	A	03/23/1998	07/15/1998	07/15/2008	P-9-24 S-29 E	Eddy	Chavez	Artesia	Santa Fe		
pENV000GW0 0252	Discharge Plan Permit	237	DCP MIDSTREAM L.P.	DUKE PECOS DIAMOND GP	A	02/05/1996	03/29/1996	03/29/2011	G-3-18 S-27 E	Eddy	Chavez	Artesia	Santa Fe		1 below grade tank registered

pENV000GW0 0254	Discharge Plan Permit	239	DCP MIDSTREAM L.P.	Duke QUINN CS	A	03/08/1996	08/09/1996	08/09/2011	L-16-31 N-8 W	San Juan	Chavez	Aztec	Santa Fe	DP w/ filing fee process, renewed, issued with letter mailed out 10/23/2006. Received $1700 fee 10/26/06. Signed DP received 1-11-07 Ok.	
pENV000GW0 0088	Discharge Plan Permit	77	DCP MIDSTREAM L.P.	Duke MIDDLE MESA CS	A	04/10/1991	11/14/1991	11/14/2006	M-10-31 N-7 W	San Juan	Chavez	Aztec	Santa Fe		
pENV000GW0 0002	Discharge Plan Permit	2	DCP MIDSTREAM L.P.	LEE GP	A	11/13/1995	03/16/1981	03/16/2011	N-30-17 S-35 E	Lea	Chavez	Hobbs	Santa Fe		
pENV000GW0 0009	Discharge Plan Permit	9	DCP MIDSTREAM L.P.	EUNICE CS	C	10/06/1988	10/11/1983		-5-21 S-36 E	Lea	Chavez	Hobbs	Santa Fe	GW-009 vacated and merged into GW-16 OCT 8, 1993	
pENV000GW0 0016	Discharge Plan Permit	15	DCP MIDSTREAM L.P.	DUKE LINAM RANCH GP	A	05/17/1989	04/25/1984	04/25/2009	-6-19 S-37 E	Lea	Chavez	Hobbs	Santa Fe	1 below grade concrete tank registered	
pENV000GW0 0017	Discharge Plan Permit	16	DCP MIDSTREAM L.P.	DUKE EUNICE GP	A	04/13/1989	04/25/1984	04/25/2009	H-5-21 S-36 E	Lea	Chavez	Hobbs	Santa Fe	10 below grade tanks + 1 sulphur pit registered	
pENV000GW0 0024	Discharge Plan Permit	23	DCP MIDSTREAM L.P.	GPM ARTESIA GP	A	01/17/1995	07/01/1985	07/01/2010	-7-18 S-28 E	Eddy	Chavez	Artesia	Santa Fe	call&E-mail 1/07/2000 120 day notice, Late flat fee notice sent 1/11/02. Flat fee received 1/29/02.	1 classifier, 5 sumps, 1 sulphur pit, 2 below grade tanks registered (Flare Pit Soil Remediation & Closure Workplan)
pENV000GW0 0025	Discharge Plan Permit	24	DCP MIDSTREAM L.P.	DUKE AVALON GP	I	06/15/1990	09/18/1985	09/18/2005	J-9-21 S-27 E	Eddy	Chavez	Artesia	Santa Fe	Notice of late flat fee sent 1/11/2002.	
pENV000GW0 0044	Discharge Plan Permit	42	DCP MIDSTREAM L.P.	GPM INDIAN HILLS GP	I		07/20/1987		L-13-21 S-25 E	Eddy	Chavez	Artesia	Santa Fe	Letter from Duke, dated 12/10/01, notifying site is inactive.	
pENV000GW0 0149	Discharge Plan Permit	138	DCP MIDSTREAM L.P.	DUKE TRACHTA CS	C		04/30/1993		-14-23 S-28 E	Eddy	Chavez	Artesia	Santa Fe	Facility is inactive	

pENV000GW0 0079	Discharge Plan Permit	69	DCP MIDSTREAM L.P.	DUKE CARLSBAD GP	A	12/28/2006	04/29/1992	04/29/2012	G-10-23 S-28 E	Eddy	Chavez	Artesia	Santa Fe	Public Notice prepared 1/15/02. Request for additional information sent 1/2/02. Received $100 filing fee & renewal on 12/28/06.	4 sumps registered
pENV000GW0 0189	Discharge Plan Permit	178	DCP MIDSTREAM L.P.	DUKE WON TON CS	C		03/21/1995	03/21/2005	I-10-17 S-37 E	Lea	Chavez	Hobbs	Santa Fe	1 below grade tank registered	
pENV000GW0 0138	Discharge Plan Permit	127	DCP MIDSTREAM L.P.	DUKE MAGNUM C.S.(BURTO N FLATS GP)	A	08/10/1992	02/03/1993	02/03/2008	G-9-20 S-29 E	Eddy	Chavez	Artesia	Santa Fe	1 below grade tank registered as sump	
pENV000GW0 0139	Discharge Plan Permit	128	DCP MIDSTREAM L.P.	DUKE PAIGE CS	A	08/11/1992	11/19/1992	11/20/2007	O-4-21 S-32 E	Lea	Chavez	Hobbs	Santa Fe	6 mo. Renewal notice sent 7/10/02; renewal application received	
pENV000GW0 0148	Discharge Plan Permit	137	DCP MIDSTREAM L.P.	DUKE CARRASCO CS	A		04/28/1993	04/28/2008	F-14-23 S-28 E	Eddy	Chavez	Artesia	Santa Fe	1 skid sump registered	
pENV000GW0 0150	Discharge Plan Permit	139	DCP MIDSTREAM L.P.	DUKE CP-1 CS	C		04/28/1993		I-15-23 S-28 E	Eddy	Chavez	Artesia	Santa Fe	Site Inactive, requested closure workplan 1/10/03, WP approved, Closure Approved 10/15/2003	
pENV000GW0 0153	Discharge Plan Permit	142	DCP MIDSTREAM L.P.	DUKE SAND DUNES CS	A	03/26/1993	05/17/1993	05/17/2008	P-23-23 S-31 E	Eddy	Chavez	Artesia	Santa Fe	1 below grade tank registered	
pENV000GW0 0155	Discharge Plan Permit	144	DCP MIDSTREAM L.P.	DUKE NORTH (WESTALL) CS	A	05/05/1993	08/19/1993	08/19/2008	E-35-22 S-28 E	Eddy	Chavez	Artesia	Santa Fe	Renewal application dated 4/3/03 - renewal on hold pending legal determination	1 below grade tank registered
pENV000GW0 0179	Discharge Plan Permit	168	DCP MIDSTREAM L.P.	DUKE SOUTH FEAGAN CS	C	07/06/1994	12/28/1994	12/27/2004	N-31-19 S-25 E	Eddy	Chavez	Artesia	Santa Fe	Late filing fee and flat fee notice sent 1/11/02. Flat fee received 1/29/02.	
pENV000GW0 0188	Discharge Plan Permit	177	DCP MIDSTREAM L.P.	DUKE MALJAMAR CS	C		03/21/1995	03/21/2005	I-20-17 S-33 E	Lea	Chavez	Hobbs	Santa Fe		
pENV000GW0 0046	Discharge Plan Permit	44	DCP MIDSTREAM L.P.	HOBBS BOOSTER CS	A		12/23/1987	12/23/2007	-4-19 S-38 E	Lea	Chavez	Hobbs	Santa Fe	renewal notice sent 7/10/02	

pENV000GW0 0270	Discharge Plan Permit	255	DCP MIDSTREAM L.P.	Duke BUENA VISTA CS	A	07/15/1996	09/05/1996	09/05/2011	B-13-30 N-9 W	San Juan	Chavez	Aztec	Santa Fe	DP renewed, issued with letter mailed out 10/23/2006. Received $1700 on 10/26/2006. Signed DP received on 1/11/2007. Ok.	
pENV000GW0 0273	Discharge Plan Permit	258	DCP MIDSTREAM L.P.	Duke CEDAR HILL CS	A	07/30/1996	09/30/1996	09/30/2011	-29-32 N-10 W	San Juan	Chavez	Aztec	Santa Fe	DP renewed, issued with letter mailed out 10/23/2006. Permit fee of $1700 received on 10/26/2006. Signed DP received on 1/11/07. Ok.	
pENV000GW0 0292	Discharge Plan Permit	277	DCP MIDSTREAM L.P.	CSI - BIG EDDY LATERAL#1 CS	A		02/17/1997	02/17/2007	A-19-21 S-28 E	Eddy	Chavez	Artesia	Santa Fe	Taken over by Duke Energy. Received DP renewal letter dated 10/19/2006 w/ $100 filing fee. Mailed out final permit 9/16/06. Awaiting $1700 Compressor Station fee.	1 below grade tank registered
pENV000GW0 0174	Discharge Plan Permit	163	DCP MIDSTREAM L.P.	DUKE APEX CS	A		04/29/1999	04/29/2004	C-36-18 S-36 E	Lea	Chavez	Hobbs	Santa Fe	request GW info and DP renewal by 12/01/04	
pENV000GW0 0186	Discharge Plan Permit	175	DCP MIDSTREAM L.P.	DUKE HOBBS GP	A		01/09/1995	01/09/2005	G-36-18 S-36 E	Lea	Chavez	Hobbs	Santa Fe	Request DP renewal and GW info BY 12/01/04	
	1RP-401-0		DCP MIDSTREAM L.P.	C-line Release Site (1RP-401-0)					O-31-19 S-37 E	Lea	?	Hobbs	Santa Fe	Meeting w/ company 2/1/07	
	AP-33		DCP MIDSTREAM L.P.	Eldridge Ranch					P-21-19 S-37 E	Lea	?	Hobbs	Santa Fe	Meeting w/ company 2/1/07	
			DCP MIDSTREAM L.P.	J-4-2 Pipeline Release Site					C-27-19 S-35 E		?	Hobbs	Santa Fe	Meeting w/ company 2/1/07	
	1RP-400		DCP MIDSTREAM L.P.	X-line Pipeline Site (1RP-400)					B-7-15 S-34 E		?	Hobbs	Santa Fe	Meeting w/ company 2/1/07	

	AP-55		DCP MIDSTREAM L.P.	RR Ext. (AP-55)				C-19-20 S-37 E		?	Hobbs	Santa Fe	Meeting w/ company 2/1/07	
	2R-043		DCP MIDSTREAM L.P.	PCA Junction				11-20 S-30 E		?	Hobbs	Santa Fe	Meeting w/ company 2/1/07	
	1R-156		DCP MIDSTREAM L.P.	Monument Booster Station				B-33-19 S-37 E (32.6238 -103.2550)		?	Hobbs	Santa Fe	Meeting w/ company 2/1/07	

Chavez, Carl J, EMNRD

From: Stone, Ben, EMNRD
Sent: Thursday, January 18, 2007 7:43 AM
To: Chavez, Carl J, EMNRD
Subject: FW: Product Recovery and Surveying

CARL, I THINK THESE (Duke) ARE YOURS??.....
Thanks, Ben

From: Elizondo, Trisha [mailto:Trisha.Elizondo@arcadis-us.com]
Sent: Wednesday, January 17, 2007 8:13 PM
To: Johnson, Larry, EMNRD; Stone, Ben, EMNRD
Cc: didick@dcpmidstream.com
Subject: Product Recovery and Surveying

Mr. Johnson and Mr. Stone-

This email is to serve as notification that ARCADIS will be conducting monthly product recovery at DCP Midstream's (formerly known as Duke Energy Field Services) Apex Compressor Station and PCA Junction on January 22 and 23, 2007. Routine product recovery is on-going at the site through hand-bailing. Jerry Longwell and Ryan Nanny will be the representatives onsite. While onsite, monitoring wells at the two locations will be also be surveyed to assist in the development of clearer depiction of groundwater flow and the potentiometric surface. Please find below location information for the two sites and topographic maps depicting their locations. If you have any questions please feel free to contact myself (303.434.2686) or Daniel Dick (303.605.1893) of DCP Midstream.

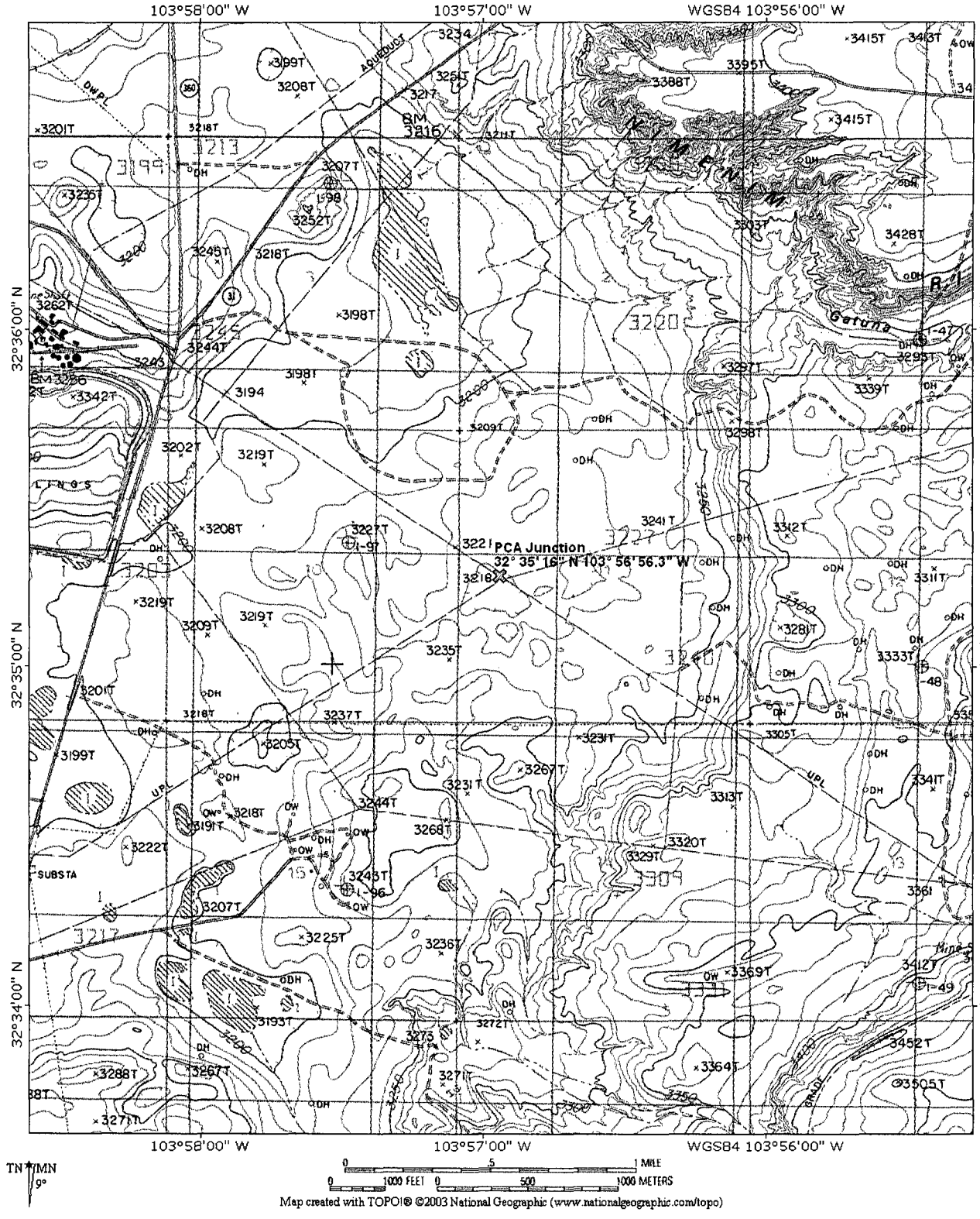
Apex Compressor Station: Center E/2, NE/4, NW/4, Section 36, T18S, R36E. Driving directions: Traveling from Hobbs, take 180 W until you come to Maddox Road (approximately 4 miles past the gas plant). Take Maddox Road north for approximately 2500 feet until you come to a rough paved road with a cattle guard and gate at the entrance. Cross the cattle guard and drive 2000 feet until you come to the front gate of the Hobbs Gas Plant. Travel around the perimeter of the gas plant to Apex Compressor Station, located adjacent northwest.

PCA Junction: Center W/2, W/2, Section 11, T20S, R30E. Driving directions: Traveling from Hobbs, take 180 W until you come to 360 N. Turn right onto the paved road and travel approximately 2.7 miles until you come to Crazy Horse Road. Turn right. At this point-you will need to be escorted to the site because of the many splits and turns on unlabeled roads. If you would like to witness product recovery events at PCA, please call Jerry Longwell at (432) 425-3763 and he will escort you to the site from Crazy Horse Road.

Thank you,

<<Fig01 Apex Site Location Map.pdf>> <<Fig01 PCA Junction Site Location Map.pdf>>

Trisha Elizondo
Environmental Scientist
ARCADIS
630 Plaza Drive, Suite 200
Highlands Ranch, Colorado 80129
Office: (720) 344-3719
Mobile: (303) 434-2686
Trisha.Elizondo@arcadis-us.com



DRAFTER: PMW | APPROVED: GN | CHECKED: TE | DRAWING: COSLM-0051 | HARD FILE: | PRJCT NO.: CO000889.2801 | DWG DATE: 11/17/04

ARCADIS

Site Location Map

PCA JUNCTION
Eddy County, New Mexico

FIGURE

1

Price, Wayne

From: Price, Wayne
Sent: Wednesday, October 20, 2004 11:35 AM
To: Sharon Hall (E-mail)
Cc: Williams, Chris
Subject: Duke conference call Oct 20, 2004

Thank you for the up-date please CC other parties.

Hobbs Gas Plant is currently permitted GW-175 and will expire Jan 09, 2005. You have missed the 120 day pre-submittal. Therefore permit will expire on that date.
Apex Compressor St is currently permitted GW-163, permit expired 4/29/2004.
CPA Junction permit # 2R0043. active remediation.

Pursuant to our telephone conference Duke shall submit the following information by December 01, 2004.

1. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer. (for GW-163 and GW-175)

2. All up-dated information pertaining to groundwater contamination with conclusions and recommendations for the three sites.

3. Submit a discharge plan renewal application with a $100 filing fee for each site, GW-163 and GW-175. Guidelines and Application attached. Please include the GW number on the application. I also included our new public notice regs with flowchart.


ofsguid.doc


dp_apps.rtf


Public Notice Reg's..doc


PN Flow Chart.doc

Good luck and look forward to working with everybody.

Sincerely:

Wayne Price
New Mexico Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505
505-476-3487
fax: 505-476-3462
E-mail: WPRICE@state.nm.us

Price, Wayne

From: Price, Wayne
Sent: Monday, March 29, 2004 1:36 PM
To: Price, Wayne; 'Cwdurrett1@aol.com'
Cc: 'Neal Goates (E-mail)'; Stubblefield, Mike
Subject: RE: ConocoPhillips PCA Junction Work Plan

-----Original Message-----
From: Price, Wayne
Sent: Monday, March 29, 2004 1:31 PM
To: 'Cwdurrett1@aol.com'; Price, Wayne
Cc: Neal Goates (E-mail)
Subject: RE: ConocoPhillips PCA Junction Work Plan

OCD hereby approves of the plan.

Please be advised that NMOCD approval of this plan does not relieve ConocoPhillips of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve (ConocoPhillips) of responsibility for compliance with any other federal, state, or local laws and/or regulations.

-----Original Message-----
From: Cwdurrett1@aol.com [mailto:Cwdurrett1@aol.com]
Sent: Monday, March 29, 2004 12:51 PM
To: WPrice@state.nm.us
Subject: Fwd: ConocoPhillips PCA Junction Work Plan

Wayne, have you had a chance to review the work plan?

Charlie Durrett
Maxim Technologies
1703 W. Industrial Ave.
Midland, TX 79701
P 432-686-8081
F 432-686-8085

Price, Wayne

From: Price, Wayne
Sent: Monday, March 29, 2004 1:31 PM
To: 'Cwdurrett1@aol.com'; Price, Wayne
Cc: Neal Goates (E-mail)
Subject: RE: ConocoPhillips PCA Junction Work Plan

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To: WPrice@state.nm.us
Subject: Fwd: ConocoPhillips PCA Junction Work Plan

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Charlie Durrett
Maxim Technologies
1703 W. Industrial Ave.
Midland, TX 79701
P 432-686-8081
F 432-686-8085

Price, Wayne

From: Cwdurrett1@aol.com
Sent: Thursday, March 25, 2004 1:41 PM
To: Price, Wayne
Subject: ConocoPhillips PCA Junction Work Plan


Signed CoPh let to OCD.pdf

Wayne:

Attached is ConocoPhillips' work plan for monitoring groundwater at PCA Junction, Eddy County, New Mexico. If you concur with this approach, ConocoPhillips will authorize Maxim to proceed. Please contact Mr. Neal Goates (832-379-6427) or me, if you have any questions or require additional information.

Sincerely,

Charlie Durrett
Maxim Technologies
1703 W. Industrial Ave.
Midland, TX 79701
P 432-686-8081
F 432-686-8085

Neal Goates
Site Manager
Risk Management & Remediation
Threadneedle 5022
600 North Dairy Ashford
Houston, TX 77079-1175
phone 832.379.6427
fax 801-382-1674
Neal.Goates@conocophillips.com

ConocoPhillips

March 24, 2004

Mr. Wayne Price
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: PCA Junction
SE¼, Sec 11, T20S, R30E
Groundwater Monitoring

Dear Wayne:

As a follow up to our discussions in December, 2003, I prepared this letter to document ConocoPhillips path forward plan for monitoring the groundwater at PCA Junction (Site). The Site is located on the U.S. Bureau of Land Management land, within Eddy County, New Mexico (32° 35.266' N, 103° 56.930' W).

The intent of this year's project is to monitor six groundwater wells at the Site for:

- Water level and
- Product thickness.

ConocoPhillips has authorized Maxim Technologies, Inc. (Maxim) to collect the above data and prepare a brief year 2004 findings report. The report will be submitted to the New Mexico Oil Conservation Division (NMOCD). Maxim will continue to collect groundwater levels and check product thickness for an additional four consecutive years (2005 – 2008) and submit a brief findings report for each year. During the fifth year (2009), Maxim will collect groundwater quality samples along with groundwater levels and product thickness. Once these data are collected a final report will be prepared for submittal to the NMOCD.

If you concur with this approach, ConocoPhillips will authorize Maxim to proceed. Please contact me or Mr. Charles Durrett (Maxim, 432-686-8081) if you have any questions or require additional information.

Sincerely,

Neal Goates
ConocoPhillips

Price, Wayne

From: Price, Wayne
Sent: Tuesday, September 10, 2002 2:16 PM
To: 'Robert Sengebush'; Price, Wayne
Cc: Clyde Yancey (E-mail); Neal Goates (E-mail); mark.a.bishop@conoco.com; Stubblefield, Mike
Subject: RE: Conoco PCA Junction, Carlsbad, NM Case # 2R0043

OCD hereby approves of Conoco's actions pursuant to 19 NMAC 15.A Rule 19.D.g and with the following conditions:

1. Conoco shall record the volume of all product recovered.
2. Conoco shall provide a closure or progress report within one year of starting recovery.
3. Conoco shall continue to delineate contamination that exceeds the WQCC standards.

Please be advised that NMOCD approval of this plan does not relieve Conoco of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Conoco of responsibility for compliance with any other federal, state, or local laws and/or regulations.

-----Original Message-----
From: Robert Sengebush [mailto:RSengebu@maximusa.com]
Sent: Tuesday, September 10, 2002 1:40 PM
To: Price, Wayne
Cc: Clyde Yancey (E-mail); Neal Goates (E-mail); mark.a.bishop@conoco.com
Subject: RE: Conoco PCA Junction, Carlsbad, NM

Wayne,

We appreciate your approval of the emergency plan for PCA Junction. We intend to proceed as soon as possible with the condensate skimming operations. Per our phone call today, I understand that we may not need a discharge permit. Please provide additional guidance and documentation regarding whether or not we need a discharge permit, and why.

Would we be in compliance if we placed the skimmed product back in the condensate tank that is already present on the site?

Thank you very much for your consideration in this matter.

Rob Sengebush, R.G.
Maxim Technologies, Inc.
(505) 237-8440

[Robert Sengebush] -----Original Message-----
From: Price, Wayne [mailto:WPrice@state.nm.us]
Sent: Tuesday, August 13, 2002 2:05 PM
To: 'Robert Sengebush'
Cc: Neal Goates (E-mail)
Subject: RE: Conoco PCA Junction, Carlsbad, NM

OCD is in receipt of the July 3, 2002 report and hereby approves of an emergency action plan to start removing PSH from the groundwater.

Please be advised that NMOCD approval of this plan does not relieve Conoco Inc. of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Conoco Inc. of responsibility for compliance with any other federal, state, or local laws and/or regulations.

-----Original Message-----
From: Robert Sengebush [mailto:RSengebu@maximusa.com]
Sent: Tuesday, August 13, 2002 1:44 PM
To: wprice@state.nm.us
Cc: Neal Goates (E-mail)
Subject: Conoco PCA Junction, Carlsbad, NM

Dear Mr. Price,

On behalf of Conoco, I am checking to see if you have reviewed the report I sent you in July, 2002 on the PCA Junction site near Carlsbad, New Mexico. We look forward to your approval of the path forward as outlined in the report. The Conoco project manager is Neal Goates.

If you have any questions, please feel free to contact me.

Best regards.

Rob Sengebush

Robert M. Sengebush, R.G.
Maxim Technologies, Inc.
10601 Lomas NE, Suite 106
Albuquerque, NM 87112
Ph (505) 237-8440
Fax (505) 237-8656
rsengebu@maximusa.com

cc: APTE

Price, Wayne

From: Price, Wayne
Sent: Tuesday, August 13, 2002 2:05 PM
To: 'Robert Sengebush'
Cc: Neal Goates (E-mail)
Subject: RE: Conoco PCA Junction, Carlsbad, NM

OCD is in receipt of the July 3, 2002 report and hereby approves of an emergency action plan to start removing PSH from the groundwater.

Please be advised that NMOCD approval of this plan does not relieve Conoco Inc. of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Conoco Inc. of responsibility for compliance with any other federal, state, or local laws and/or regulations.

-----Original Message-----
From: Robert Sengebush [mailto:RSengebu@maximusa.com]
Sent: Tuesday, August 13, 2002 1:44 PM
To: wprice@state.nm.us
Cc: Neal Goates (E-mail)
Subject: Conoco PCA Junction, Carlsbad, NM

Dear Mr. Price,

On behalf of Conoco, I am checking to see if you have reviewed the report I sent you in July, 2002 on the PCA Junction site near Carlsbad, New Mexico. We look forward to your approval of the path forward as outlined in the report. The Conoco project manager is Neal Goates.

If you have any questions, please feel free to contact me.

Best regards.

Rob Sengebush

Robert M. Sengebush, R.G.
Maxim Technologies, Inc.
10601 Lomas NE, Suite 106
Albuquerque, NM 87112
Ph (505) 237-8440
Fax (505) 237-8656
rsengebu@maximusa.com

Price, Wayne

From: Price, Wayne
Sent: Wednesday, January 23, 2002 2:52 PM
To: 'cyancey@swcp.com'; 'joyce.m.miley@usa.conoco.com'
Cc: Stubblefield, Mike; 'R-Neal.Goates@conoco.com'
Subject: Conoco PCA Junction OCD Case # 2R0043

Contacts: Clyde Yancey

Dear Mr. Yancey:

OCD is in receipt Conoco's request dated September 10, 2001 to perform additional delineation work on the above subject site. Conoco's request is hereby approved. Notify the OCD Santa Fe office and the OCD District office at least 72 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples during OCD's normal business hours. Please submit the results of the investigation by March 22, 2002.

Please be advised that NMOCD approval of this plan does not relieve Conoco NG&GP of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Conoco NG&GP of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Price, Wayne

[redacted]

From: Price, Wayne

Sent: Thursday, January 11, 2001 11:46 AM

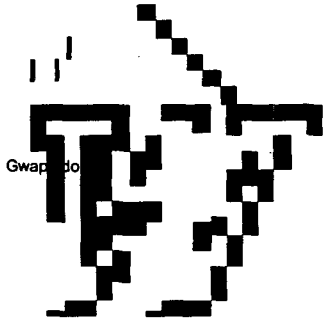
To: 'Clyde L. Yancey'

Subject: RE: Work Plans for Apex Compressor Station and PCA Junction

GW-163 NO GW ??

CASE # ASSIGNED 2R0043

The groundweater investigation work plan is hereby approved with the following additional conditions as listed in the attachment Gwapp.doc:



From: Clyde L. Yancey[SMTP:cyancey@swcp.com]

Sent: Wednesday, January 10, 2001 3:40 PM

To: WPrice@state.nm.us

Cc: Skopak, John E.; Bishop, Mark A.

Subject: Work Plans for Apex Compressor Station and PCA Junction

<<File: OCD Cover Letter.doc>><<File: WORKPLAN 1.DOC>><<File: WORKPLAN 1 PCA.DOC>>

Dear Wayne,

Attached is a cover letter to you and two work plans for the above referenced sites. We would appreciate *your review and comments as soon as possible.* We would like to get out and install/sample the monitor w during the week of 1/22/01.

Thanks,

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Subject: RE: Work Plans for Apex Compressor Station and PCA Junction

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Gwapp.doc

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Thanks,
Clyde
505-237-8440

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Dear Wayne,

Attached is a cover letter to you and two work plans for the above referenced sites. We would appreciate your review and comments as soon as possible. We would like to get out and install/sample the monitor wells during the week of 1/22/01.

Thanks,

1. A minimum of three soil samples shall be submitted for laboratory confirmation from each bore hole and shall be analyzed for Benzene, Toluene, Ethlybeneze, and total Xylene (BTEX method 8021), Total Petroleum Hydrocarbons (TPH method 418.1 or 8015) and chlorides.

2. New monitor well(s) shall be completed as follows:

   a. At least 15 feet of well screen shall be placed across the water table interface with 5 feet of the well screen above the water table and 10 feet of the well screen below the water table.

   b. An appropriately sized gravel pack shall be set in the annulus around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.

   c. A 2-3 foot bentonite plug shall be placed above the gravel pack.

   d. The remainder of the hole shall be grouted to the surface with cement containing 3-5% bentonite.

   e. A concrete pad shall be placed at the surface around the well. The well shall be installed with a suitable protective locking device.

   f. The well(s) shall be developed after construction using EPA approved procedures.

3. No less than 48 hours after the well(s) are developed, ground water from all monitor well(s) shall be purged, sampled and analyzed for Volatile Organics (EPA method 8260), General chemistry, total dissolved solids, pH (EPA method CFR 40 136.3) and New Mexico Water Quality Control Commission (WQCC) metals, all using EPA approved methods and quality assurance/quality control (QA/QC) procedures.

4. All wastes generated during the investigation shall be disposed of at an OCD approved facility.

5. Conoco Inc. shall submit the results of the investigation to the OCD Santa Fe Office **by April 15, 2001** with a copy provided to the appropriate OCD District Office and shall include the following investigative information:

   a. A description of all investigation, remediation and monitoring activities which have occurred including conclusions and recommendations.

   b. A geologic/lithologic log and well completion diagram for each bore hole or monitor well.

   c. A water table potentiometric map showing the location of the leaks and spills, excavated areas, monitor wells, and any other pertinent site features as well as the

direction and magnitude of the hydraulic gradient.

d. Isopleth maps for contaminants of concern which were observed during the investigations.

e. Summary tables of all soil and ground water quality sampling results and copies of all laboratory analytical data sheets and associated QA/QC data taken within the past year.

f. The quantity and disposition of all recovered product and/or wastes generated.

6. Conoco Inc. will notify the OCD Santa Fe office and the appropriate OCD District office at least 48 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples during OCD's normal business hours.

Please be advised that NMOCD approval of this groundwater investigation plan does not relieve Conoco Inc. of responsibility should their activities have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Conoco Inc. of responsibility for compliance with any other federal, state, or local laws and/or regulations.

10601 Lomas NE
Suite 106
Albuquerque, NM 87112

505-237-8440

MAXIM Technologies Inc®

Mr. Wayne Price
NM Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

RE: Work Plans – Apex Compressor Station & PCA Junction

Dear Wayne:

Please find attached work plans for the above referenced sites. These work plans address the installation and sampling of monitor wells to assess hydrocarbon impacts addressed in the December 6, 2000 letter from Maxim (on behalf of Conoco Inc.) to your attention. We would appreciate your review and comments on the plans. It is our intention to initiate the work during the week of January 22, 2001. Therefore, we would appreciate your review as soon as possible.

If you have any questions, please do not hesitate to call.

Sincerely,
MAXIM TECHNOLOGIES, INC.

Clyde

Copy:
John E. Skopak, Conoco RT, Houston, TX
Mark A. Bishop, Conoco NG&GP, Maljamar, NM

10601 Lomas NE
Suite 106
Albuquerque, NM 87112

505-237-8440

MAXIM Technologies Inc®

January 9, 2001

Mr. John E. Skopak, Senior Project Manager
Conoco Inc.
600 North Dairy Ashford
Houston, TX 77079-1175

RE: PCA Junction
Work Plan for Monitor Well Installation
Eddy County, New Mexico

Dear John:

Maxim Technologies Inc. (Maxim) is pleased to submit this work plan to install and sample three monitor wells at the PCA Junction facility in Eddy, New Mexico (near Carlsbad). The PCA Junction facility is a recent acquisition of Conoco Inc. (Conoco) from LG&E. Based on environmental data generated by Maxim during the due diligence phase of the Conoco acquisition, groundwater impacts were noted at the above referenced facility. PCA Junction consists of two bermed condensate tanks, two methanol saddle tans and associated gas piping. The site equipment is fenced by barbed wire and chain link.

Previous Work

Three soil borings were advanced at PCA Junction on September 27, 2000. Boring B-1 was advanced on the west side of the condensate tanks to a depth of 40 feet below ground surface (bgs). B-2 was advanced on the south side of the tank farm to a depth of 25 bgs. B-3 was advanced on the east side of the condensate tanks to a depth of 25 feet bgs. Temporary monitoring wells were installed in all three borings. Groundwater levels ranged from 22.33 to 23.35 bgs.

Analysis of soil samples indicates that the twenty-foot soil sample obtained from boring B-1 contained TPH (320 mg/kg) in exceedance of the New Mexico Oil Conservation Division (OCD) action levels.

Analysis of groundwater samples indicated that the concentrations of benzene, toluene and xylenes in the sample obtained from boring B-1, and the concentration of benzene in the sample obtained from boring B-2 exceeded OCD action levels.

The OCD was notified of this impact on December 2, 2000 by letter.

Scope of Work

Maxim proposes the following scope of work:

1. Maxim will install three, 2-inch diameter PVC monitor wells around the existing condensate tank farm at the PCA Junction facility. The wells will be installed and developed per OCD guidelines. The purpose of the wells will be to ascertain the groundwater gradient and horizontal extent of groundwater impacts.

2. The monitor wells will be installed with a truck-mounted drill rig. The borings will be continuously sampled during drilling activities and logged according to the Unified Soil Classification System so that observations concerning soil types, lithologic changes, and the environmental condition of the encountered soils can be noted.

3. The soil samples will be field screened with a photo-ionization detector (PID) to detect the presence of volatile organic vapors.

4. Groundwater samples will be collected from the three monitor wells and analyzed for the "full suite" as defined in the OCD guidance (*Guidelines for Remediation of Leaks, Spills and Releases*, 8/13/93). The "full suite" includes BTEX, major cations/anions, RCRA metals, and polynuclear aromatic hydrocarbons.

5. Soil cuttings and purge water (if impacted) generated by the monitor well installation will be containerized and disposed of offsite. If PID readings indicate that soil cuttings are clean, that soil will be spread onsite. If analytical results indicate that purge water is clean, that water will be disposed of within onsite sumps.

Project Schedule

Maxim is prepared to commence work on this project immediately following receipt of your notification to proceed. Tentatively we are scheduled to initiate the work commencing on January 24, 2001 at the PCA Junction facility. Maxim will notify both the Santa Fe and Hobbs OCD offices of the schedule.

If this Scope of Work meets with your approval, please let me know as soon as possible. Please contact Clyde Yancey (505-237-8440) if you have any questions or require additional information.

Sincerely,
MAXIM TECHNOLOGIES, INC.

Clyde L. Yancey, P.G.
Senior Project Manager

Copy:
Mr. Mark Bishop, Conoco NG&GP, Maljamar, NM
Mr. Wayne Price, NM OCD, Santa Fe, NM