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273

# **REPORTS**

**DATE:**

1998



# Highlander Environmental Corp.

Midland, Texas

May 1, 1998

Mr. Wayne Price  
Environmental Engineer  
State of New Mexico  
Oil Conservation Division  
Energy, Minerals and Natural Resources Department  
100 W. Broadway  
Hobbs, New Mexico 88240

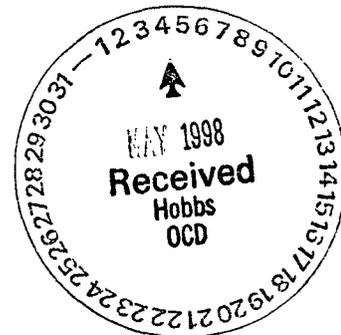
**Re: Report on the Investigation of the Former Greenhill Petroleum Landfarm,  
Lovington Paddock / San Andres Unit, Lea County, New Mexico.**

Dear Mr. Price:

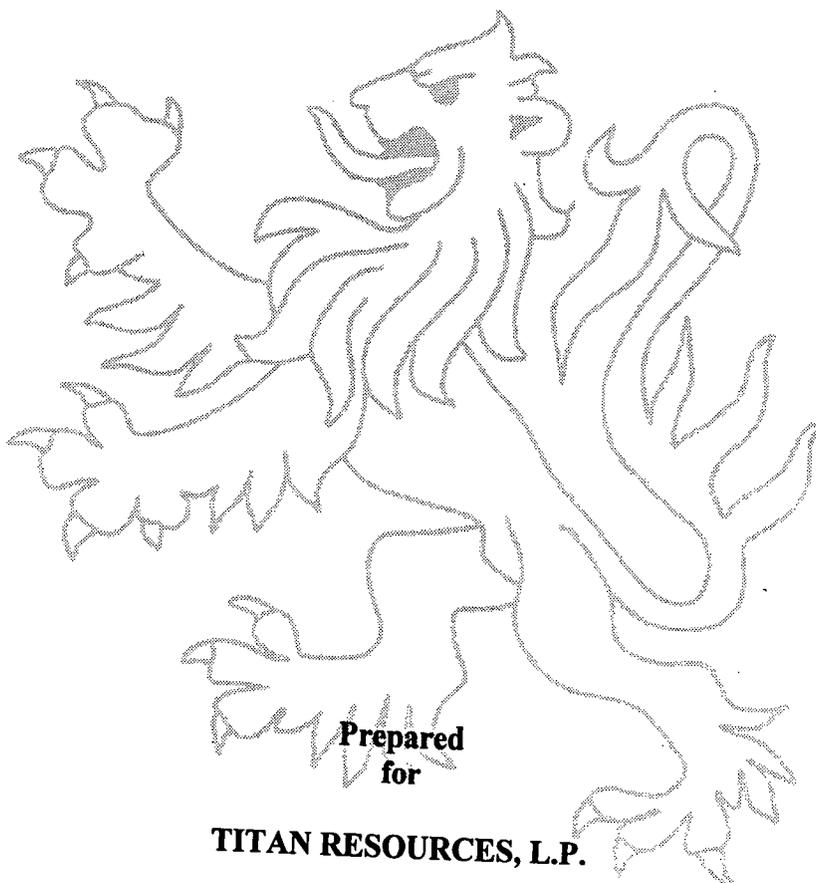
The enclosed report details the findings of the above-mentioned investigation. If you have any questions or require any additional information, please advise. Thank you for your assistance in this matter.

Very truly yours,

Timothy M. Reed, REM  
Vice President



**INVESTIGATION OF FORMER GREENHILL PETROLEUM LANDFARM  
LOVINGTON PADDOCK / SAN ANDRES UNIT  
LEA COUNTY, NEW MEXICO**

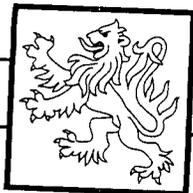


**Prepared  
for**

**TITAN RESOURCES, L.P.**

**April, 1998**

  
Timothy M. Reed



**Highlander Environmental Corp.**

Midland, Texas



# Highlander Environmental Corp.

Midland, Texas

## INVESTIGATION OF FORMER GREENHILL PETROLEUM LANDFARM LOVINGTON PADDOCK / SAN ANDRES UNIT LEA COUNTY, NEW MEXICO

Prepared For  
**TITAN RESOURCES, L.P.**

### **1.0 INTRODUCTION**

The purpose of this report is to detail the findings of an investigation on a landfarm located in the Lovington Paddock / San Andres Unit in the NE/4 of Section 1, T-17-S, R-36-E, Lea County, New Mexico. This landfarm was previously installed and operated by Greenhill Petroleum. This investigation was performed for Titan Resources, L.P. (Titan).

### **2.0 BACKGROUND**

Titan purchased production in the Lovington Paddock / San Andres Field in December 1997 from Pioneer Natural Resources. Pioneer had acquired this property from Greenhill Petroleum in early 1997. Conveyed along with this production was an ongoing bioremediation (landfarm) area at the Central Production Facility, which Greenhill had operated since 1994. This landfarm had been approved by the New Mexico Oil Conservation Division (NMOCD) to treat sludges and sediments from two open topped tanks and one unlined pit. The two tanks, labeled North Pit and South Pit, were being taken out of service at the Central Tank Battery. The North and South Pits were both polyethelene lined steel tanks, measuring 4' tall by 100' in diameter. The open unlined pit was designated the Getty-Walker Pit. Highlander personnel had sampled the North, South and Getty-Walker pits in 1992 and the results showed elevated lead levels of 137 mg/kg, 64 mg/kg and 32 mg/kg respectively. A copy of Highlander's original report is included in Appendix B.

On October 11, 1994, Safety and Environmental Solutions, Inc., submitted a closure request to the New Mexico Oil Conservation Division (NMOCD). However, the question of elevated lead and insufficient sampling were apparently causes for the denial of the closure request. The analysis of a composite sample for total lead had been submitted with the closure request and indicated a total lead level in composite of 37.3 mg/kg at the 3.0' depth. Toxicity Characteristic Leachate Procedure (TCLP) testing previously submitted did not indicate any leachability for the lead contained within this landfarm. Titan, upon closing the purchase of this property, retained Highlander Environmental Corp. to assist in closing this landfarm.

Highlander personnel Tim Reed and Gary Miller met with Wayne Price of the NMOCD at the site on February 27, 1998. Also present for the meeting were Ron Lechwar and Bill Hearne with Titan. At that time, it was agreed that additional profiling of the landfarm would be performed to determine if additional work and/or a risk assessment needed to be performed at this facility. It was agreed that the site would be gridded into six areas and samples taken with a backhoe at depths of 0-1.0', 3.0' and 5.0'. Additionally, samples were to be taken at a depth of 5.0' below the surface in the areas where the old tanks had been to confirm that no residual lead contamination existed.

## **2.0 INVESTIGATION**

On March 9, 1998, Lynn Ward with Highlander supervised the investigation of the landfarm area. The site was segregated into six areas as shown on the attached Figure 2. Discrete soil samples were taken with a backhoe at depths of 0-1.0', 3.0' and 5.0' in each of the six areas (18 samples in all). The prior location of the removed north and south pits (tanks) were ascertained and it was determined that only the north pit area was accessible. The south pit area is currently the site of a 5000-barrel storage tank. A backhoe trench was excavated in the area of the removed north pit, and samples were taken at 0-1.0', 3.0' and 5.0' below surface.



All of the samples were placed in laboratory prepared containers and chilled to 4°C. The samples were shipped under standard Chain of Custody control to TraceAnalysis, Inc. in Lubbock, Texas. The samples were analyzed for total petroleum hydrocarbons (TPH), by EPA method 418.1, benzene, toluene, ethylbenzene and xylene (BTEX), by EPA method 8020 and total lead (Pb), by EPA SW 846-3015, 6010B.

### 3.0 SAMPLE RESULTS

The following table lists the analytical results for the landfarm area:

**Table 1.**  
(All results in mg/kg)

Location	0-1.0'	3.0'	5.0'
Area 1	Pb 7.0 BTEX <0.050 TPH 11,900	Pb 5.2 BTEX <0.050 TPH 96.9	Pb <5.0 BTEX <0.050 TPH 38.5
Area 2	Pb 13.0 BTEX 0.435 TPH 21,900	Pb <5.0 BTEX 1.66 TPH 14.100	Pb <5.0 BTEX <0.050 TPH 139
Area 3	Pb 15.0 BTEX <0.050 TPH 8,200	Pb <5.0 BTEX <0.050 TPH 161	Pb <5.0 BTEX <0.050 TPH 139
Area 4	Pb 15.0 BTEX <0.050 TPH 7,120	Pb <5.0 BTEX <0.050 TPH 916	Pb <5.0 BTEX <0.050 TPH 235
Area 5	Pb 22.0 BTEX <0.050 TPH 16,900	Pb <5.0 BTEX <0.050 TPH 121	Pb <5.0 BTEX <0.050 TPH 12.5



Location	0-1.0'	3.0'	5.0'
Area 6	Pb 7.6 BTEX <0.050 TPH 4,240	Pb <5.0 BTEX <0.050 TPH 133	Pb <5.0 BTEX <0.050 TPH <10

Referring to the table, the highest total lead level found was in the 0-1.0' sample in Area 5 at 22 mg/kg. With the exception of Area 1 (5.2 mg/kg at 3.0'), no lead levels above the method detection limits were found in the deeper soils. BTEX levels were below method detection limits for all samples except the 0-1.0' and 3.0' samples in Area 2, which exhibited total BTEX levels of 0.435 and 1.66 mg/kg respectively. No benzene was detected in either sample. The total BTEX levels were well below the NMOCD recommended remedial action level (RRAL) of 50 mg/kg. TPH levels were high in the 0-1.0' samples, ranging from 4,240 mg/kg to 21,900 mg/kg, however, all samples were below 100 mg/kg in the 3.0' sample with the exception of Area 2. The TPH levels in Area 2 decreased dramatically from 14,100 mg/kg in the 3.0' sample to 139 mg/kg in the 5.0' sample. Previous reports indicate that the depth to groundwater in this area is approximately 85' below the surface. With this groundwater depth, the NMOCD guidelines specify a clean up level for TPH of 1,000 mg/kg.

The samples taken from the test trench in the area of the removed North Pit were analyzed for total lead. The samples were taken from 0-1.0', 3.0' and 5.0' below surface. The reported total lead levels were 4.2 mg/kg, <2.0 mg/kg and <2.0 mg/kg respectively, indicating no residual lead contamination of soils. Copies of the laboratory reports are included in Appendix A.

#### 4.0 CONCLUSIONS

1. The highest total lead level found in the landfarm was in the 0-1.0' sample in Area 5 at 22 mg/kg.



2. With the exception of Area 1 (5.2 mg/kg at 3.0'), no lead levels above the method detection limits were found in the deeper soils.
3. BTEX levels were below method detection limits for all samples except the 0-1. ' and 3.0' samples in Area 2, which exhibited total BTEX levels of 0.435 and 1.66 mg/kg respectively. No benzene was detected in either sample. These levels are well below the NMOCD RRAL level of 50 mg/kg total BTEX.
4. TPH levels were high in the 0-1.0' samples, ranging from 4,240 mg/kg to 21,900 mg/kg, however all samples were below 100 mg/kg in the 3.0' sample with the exception of Area 2. The TPH levels in this area did decrease dramatically from 14,100 mg/kg in the 3.0' sample to 139 mg/kg in the 5.0' sample.
5. Previous reports indicate that the depth to groundwater in this area is approximately 85' below the surface. With this groundwater depth, the NMOCD guidelines specify a clean up level for TPH of 1,000 mg/kg.
6. The samples taken from the test trench in the area of the removed North Pit were analyzed for total lead. The samples were taken from 0-1.0', 3.0' and 5.0' below surface. The reported total lead levels were 4.2 mg/kg, <2.0 mg/kg and <2.0 mg/kg respectively, indicating no residual lead contamination of soils.

## 5.0 RECOMMENDATIONS

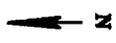
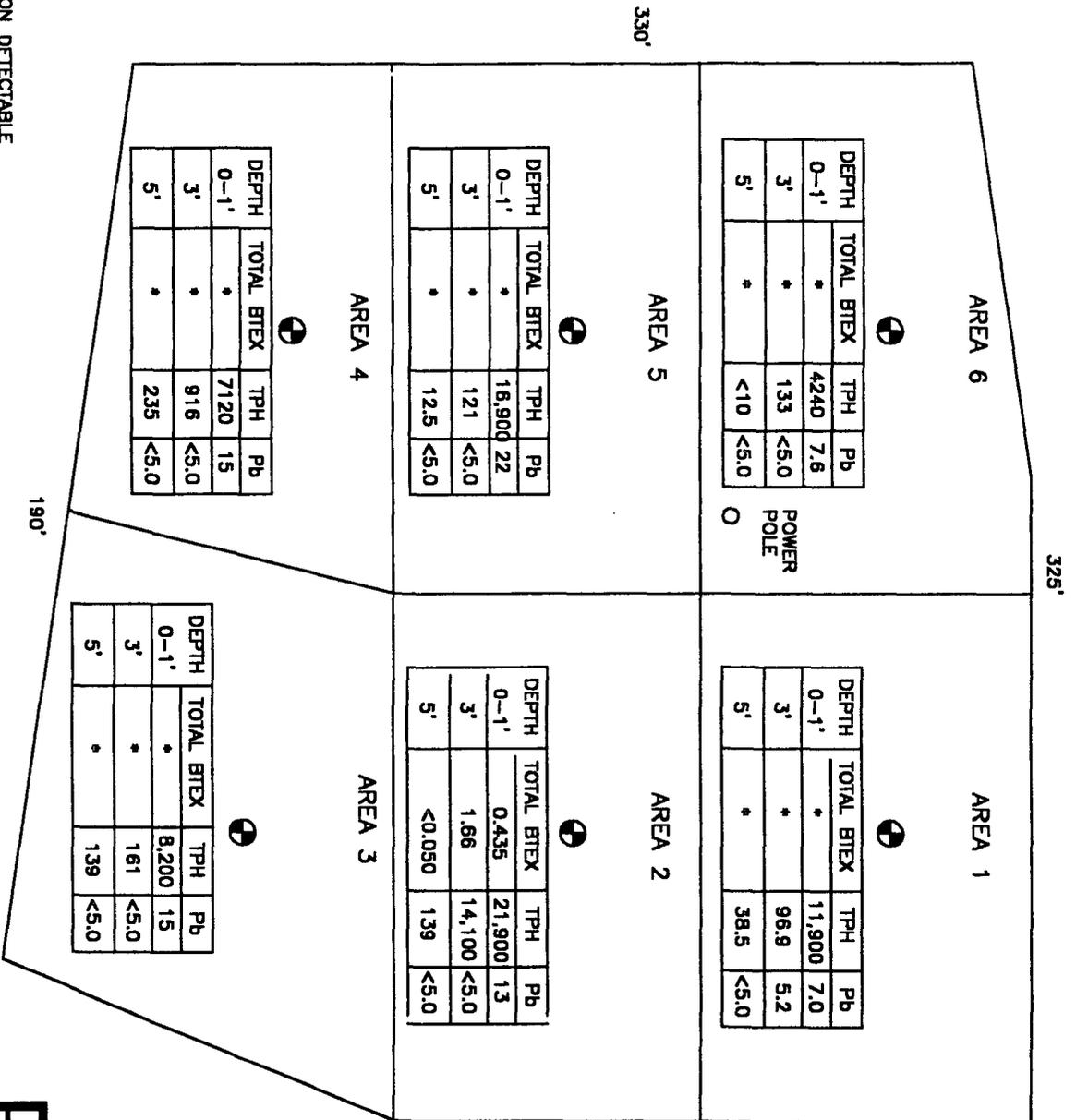
1. The shallow surface soils across the entire landfarm should be turned to a depth of approximately 18".
2. The soils in Area 2 should be turned to a depth of approximately 36" to 42" to address in order to bring the deeper contamination to the surface for treatment.
3. All of the soils should be treated with a high nitrogen fertilizer and the area watered.



4. The soils should continue to be turned and watered on a monthly basis to promote natural attenuation of hydrocarbons.
5. The surface soils should be re-sampled and analyzed to total petroleum hydrocarbons (TPH) at the end of six months of treatment to assess if further actions are necessary to close this site.



\* = NON DETECTABLE



NOT TO SCALE

DATE	4/2/98
DRAWN BY	JDA
TITLE	ENVIRONMENTAL
SCALE	AS SHOWN

LEA COUNTY, NEW MEXICO
TITAN RESOURCES, L.P.
GREENHILL LANDFARM
LOVINGTON PADDOCK/SAN ANDRES
HIGHLANDER ENVIRONMENTAL CORP.
MIDLAND, TEXAS



# TRACE ANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298  
 4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944

E-Mail: lab@traceanalysis.com

**ANALYTICAL RESULTS FOR**  
**Highlander Environmental Services**  
 Attention Lynn Ward

Date: Mar 23, 1998 1910 N. Big Spirng St.  
 Date Rec: 3/11/98 Midland TX 79705  
 Project: 1084 Lab Receiving # : 9803000189  
 Proj Name: Greenhill Landfarm Sampling Date: 3/9/98  
 Proj Loc: N/A Sample Condition: Intact and Cool  
 Sample Received By: VW

TA#	Field Code	MATRIX	TRPHC (mg/Kg)
T93179	Area 1 @ Surface	Soil	11,900
T93180	Area 1 @ 3'	Soil	96.9
T93181	Area 1 @ 5'	Soil	38.5
T93182	Area 2 @ Surface	Soil	21,900
T93183	Area 2 @ 3'	Soil	14,100
T93184	Area 2 @ 5'	Soil	139
T93185	Area 3 @ Surface	Soil	8,200
T93186	Area 3 @ 3'	Soil	161
T93187	Area 3 @ 5'	Soil	139
T93188	Area 4 @ Surface	Soil	7,120
T93189	Area 4 @ 3'	Soil	916
T93190	Area 4 @ 5'	Soil	235
T93191	Area 5 @ Surface	Soil	16,900
T93192	Area 5 @ 3'	Soil	121
T93193	Area 5 @ 5'	Soil	12.5
T93194	Area 6 @ Surface	Soil	4,240
T93195	Area 6 @ 3'	Soil	133
T93196	Area 6 @ 5'	Soil	<10.0
Method Blank			<10.0
Reporting Limit			10
QC			99

RPD 15  
 % Extraction Accuracy 112  
 % Instrument Accuracy 99

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/Kg)
TRPHC	EPA 3550	3/18/98	EPA 418.1	3/18/98	MS	100	250

3-23-98

Director, Dr. Blair Leftwich

Date

# TRACE ANALYSIS, INC.

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

## ANALYTICAL RESULTS FOR

Highlander Environmental Services

Attention Lynn Ward

1910 N. Big Spring St.

Midland

Date: Mar 19, 1998

Date Rec: 3/11/98

Project: 1084

Proj Name: Greenhill Landfarm

Proj Loc: N/A

Lab Receiving #: 9803000189

Sampling Date: 3/9/98

Sample Condition: Intact and Cool

Sample Received By: VW

TX 79705

### TA# Field Code

### MATRIX

### BENZENE (mg/Kg)

### TOLUENE (mg/Kg)

### ETHYL- BENZENE (mg/Kg)

### M, P, O XYLENE (mg/Kg)

### TOTAL BTEX mg/Kg)

T 93179	Area 1 @ Surface	Soil	<0.050	<0.050	<0.050	<0.050	<0.050
T 93180	Area 1 @ 3'	Soil	<0.050	<0.050	<0.050	<0.050	<0.050
T 93181	Area 1 @ 5'	Soil	<0.050	<0.050	<0.050	<0.050	<0.050
T 93182	Area 2 @ Surface	Soil	<0.050	<0.050	0.058	0.377	0.435
T 93183	Area 2 @ 3'	Soil	<0.050	<0.050	0.276	1.38	1.66
T 93184	Area 2 @ 5'	Soil	<0.050	<0.050	<0.050	<0.050	<0.050
T 93185	Area 3 @ Surface	Soil	<0.050	<0.050	<0.050	<0.050	<0.050
T 93186	Area 3 @ 3'	Soil	<0.050	<0.050	<0.050	<0.050	<0.050
T 93187	Area 3 @ 5'	Soil	<0.050	<0.050	<0.050	<0.050	<0.050

Method Blank

Reporting Limit

QC

RPD	1	2	3	3	
% Extraction Accuracy	102	95	93	97	
% Instrument Accuracy	93	86	85	87	

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: mg/Kg)
BTEX	EPA 5030	3/14/98	EPA 8021B	3/14/98	JG	0.100 ea	5 ea

3-19-98



# TRACE ANALYSIS, INC.

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 E-Mail: lab@traceanalysis.com

## ANALYTICAL RESULTS FOR

Highlander Environmental Services

Attention Lynn Ward

1910 N. Big Spring St.

Midland

Date: Mar 19, 1998  
 Date Rec: 3/11/98  
 Project: 1084  
 Proj Name: Greenhill Landfarm  
 Proj Loc: N/A

Lab Receiving #: 9803000189

Sampling Date: 3/9/98

Sample Condition: Intact and Cool

Sample Received By: VW

TA#	Field Code	MATRIX	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL- BENZENE (mg/Kg)	M, P, O XYLENE (mg/Kg)	TOTAL BTEX mg/Kg)
T 93188	Area 4 @ Surface	Soil	<0.050	<0.050	<0.050	<0.050	<0.050
T 93189	Area 4 @ 3'	Soil	<0.050	<0.050	<0.050	<0.050	<0.050
T 93190	Area 4 @ 5'	Soil	<0.050	<0.050	<0.050	<0.050	<0.050
T 93191	Area 5 @ Surface	Soil	<0.050	<0.050	<0.050	<0.050	<0.050
T 93192	Area 5 @ 3'	Soil	<0.050	<0.050	<0.050	<0.050	<0.050
T 93193	Area 5 @ 5'	Soil	<0.050	<0.050	<0.050	<0.050	<0.050
T 93194	Area 6 @ Surface	Soil	<0.050	<0.050	<0.050	<0.050	<0.050
T 93195	Area 6 @ 3'	Soil	<0.050	<0.050	<0.050	<0.050	<0.050
T 93196	Area 6 @ 5'	Soil	<0.050	<0.050	<0.050	<0.050	<0.050

Method Blank

Reporting Limit

QC

<0.050 <0.050 <0.050 <0.050  
 0.05 0.05 0.05 0.05  
 0.093 0.086 0.085 0.260

RPD	1	2	3	3
% Extraction Accuracy	102	95	93	97
% Instrument Accuracy	93	86	85	87

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: mg/Kg)
BTEX	EPA 5030	3/14/98	EPA 8021B	3/14/98	JG	0.100 ea	5 ea

3-19-98

BR



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 E-Mail: lab@traceanalysis.com

**ANALYTICAL RESULTS FOR  
 HIGHLANDER SERVICES**  
 Attention: Lynn Ward  
 1910 N. Big Spring St.  
 Midland, TX 79705

March 20, 1998  
 Receiving Date: 03/11/98  
 Sample Type: Soil  
 Project No: 1084  
 Project Location: NA

Prep Date: 03/12/98  
 Analysis Date: 03/13/98  
 Sampling Date: 03/09/98  
 Sample Condition: Intact & Cool  
 Sample Received by: VW  
 Client Name: Titan  
 Project Name: Greenhill Landfarm  
 (Bio Cell)

TA#	FIELD CODE	TOTAL Pb (mg/kg)
T93179	Area 1 @ Surface	7.0
T93180	Area 1 @ 3'	5.2
T93181	Area 1 @ 5'	<5.0
T93182	Area 2 @ Surface	13
T93183	Area 2 @ 3'	<5.0
T93184	Area 2 @ 5'	<5.0
T93185	Area 3 @ Surface	15
T93186	Area 3 @ 3'	<5.0
T93187	Area 3 @ 5'	<5.0
T93188	Area 4 @ Surface	15
T93189	Area 4 @ 3'	<5.0
T93190	Area 4 @ 5'	<5.0
T93191	Area 5 @ Surface	22
T93192	Area 5 @ 3'	<5.0
T93193	Area 5 @ 5'	<5.0
T93194	Area 6 @ Surface	7.6
T93195	Area 6 @ 3'	<5.0
T93196	Area 6 @ 5'	<5.0
ICV		1.06
CCV		1.03
Reporting Limit		5.0
RPD		3
% Extraction Accuracy		95
% Instrument Accuracy		105

METHODS: EPA SW 846-3051, 6010B.  
 CHEMIST: RR  
 TOTAL Pb SPIKE: 200 mg/kg TOTAL Pb.  
 TOTAL Pb CV: 1.0 mg/L TOTAL Pb.

  
 \_\_\_\_\_  
 Director, Dr. Blair Leftwich

3-20-98  
 \_\_\_\_\_  
 DATE



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# Analysis Request and Chain of Custody Record

## HIGHLANDER ENVIRONMENTAL CORP.

1910 N. Big Spring St.  
Midland, Texas 79705

(915) 682-4559 Fax (915) 682-3946

CLIENT NAME: Titan SITE MANAGER: Lynn Ward

PROJECT NO.: 1084 PROJECT NAME: Grunkhill Landfarm (Bio Cell)

LAB I.D. NUMBER	DATE	TIME	MATRIX	COMP.	GRAB	SAMPLE IDENTIFICATION	PRESERVATIVE METHOD				NUMBER OF CONTAINERS	FILTERED (Y/N)	
							HCL	HNO3	ICE	NONE			
97	3/9/98		S	X	X	Area 4 @ Surface		X				1	
89	3/9/98		S	X	X	Area 4 @ 3'		X				1	
90	3/9/98		S	X	X	Area 4 @ 5'		X				1	
91	3/9/98		S	X	X	Area 5 @ Surface		X				1	
92	3/9/98		S	X	X	Area 5 @ 3'		X				1	
93	3/9/98		S	X	X	Area 5 @ 5'		X				1	
94	3/9/98		S	X	X	Area 6 @ Surface		X				1	
95	3/9/98		S	X	X	Area 6 @ 3'		X				1	
96	3/9/98		S	X	X	Area 6 @ 5'		X				1	

RELINQUISHED BY: (Signature) Lynn Ward Date: 3/9/98 Time: 11:40 AM  
 RECEIVED BY: (Signature) Allen Skobton  
 RELINQUISHED BY: (Signature) Lynn Ward Date: 3/10/98 Time: 6:00 PM  
 RECEIVED BY: (Signature) Allen Skobton  
 RELINQUISHED BY: (Signature) Lynn Ward Date: 3/10/98 Time: 6:00 PM  
 RECEIVED BY: (Signature) Allen Skobton

RECEIVING LABORATORY: Titan Analytical  
 ADDRESS: Substack STATE: TX PHONE: 800/378-1296 DATE: 3-11-98 TIME: 9:00 AM  
 CONTACT: Substack

SAMPLE CONDITION WHEN RECEIVED: \_\_\_\_\_ MATRIX: W-Water A-Air SD-Solid S-Soil 0-Other

REMARKS: Please hold samples in possible TCCP

PAGE: 2 OF: 2

ANALYSIS REQUEST (Circle or Specify Method No.)

Method No.	Method Name	Result
1	BTEX 8020/602	X
2	MTBE 8020/602	X
3	TPH	X
4	PAH 8270	X
5	RCA Metals Ag As Ba Cd Cr Pb Hg Se	X
6	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	X
7	TCLP Volatiles	X
8	TCLP Semi Volatiles	X
9	RCl	
10	GC/MS Vol. 8240/8260/624	
11	GC/MS Semi. Vol. 8270/825	
12	PCB's 8080/608	
13	Pest. 808/608	
14	BOD, TSS, pH, TDS, Chloride	
15	Gamma Spec.	
16	Alpha Beta (Air)	
17	PLM (Asbestos)	

DATE: 3/9/98

SAMPLED BY: (Signature) Lynn Ward

RELINQUISHED BY: (Signature) Lynn Ward Date: 3/9/98 Time: 11:40 AM

RECEIVED BY: (Signature) Allen Skobton

RELINQUISHED BY: (Signature) Lynn Ward Date: 3/10/98 Time: 6:00 PM

RECEIVED BY: (Signature) Allen Skobton

FEDEX HAND DELIVERED  AIRBILL # 155 758884

UPS  OTHER: \_\_\_\_\_

HIGHLANDER CONTACT PERSON: Lynn Ward

RESULTS BY: \_\_\_\_\_

RUSH CHARGES AUTHORIZED: Yes  No



# TRACE ANALYSIS, INC.

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

**ANALYTICAL RESULTS FOR  
 HIGHLANDER SERVICES**  
 Attention: Lynn Ward  
 1910 N. Big Spring St.  
 Midland, TX 79705

March 18, 1998  
 Receiving Date: 03/11/98  
 Sample Type: Soil  
 Project No: 1084  
 Project Location: NA

Prep Date: 03/12/98  
 Analysis Date: 03/17/98  
 Sampling Date: 03/09/98  
 Sample Condition: Intact & Cool  
 Sample Received by: VW  
 Client Name: Titan  
 Project Name: Greenhill Landfarm

TA#	FIELD CODE	TOTAL Pb (mg/kg)
T93164	N. Pit Area @ Surface	4.2
T93165	N. Pit Area @ 3'	<2.0
T93166	N. Pit Area @ 5.0'-5.4'	<2.0
ICV		0.98
CCV		0.99
Reporting Limit		2.0
RPD		1
% Extraction Accuracy		70*
% Instrument Accuracy		98

**\*NOTE: Extraction Accuracy out of accepted limits of 75-125% because of matrix effects.  
 LCS shows that the test was in range.**

METHODS: EPA SW 846-3051, 6010B.  
 CHEMIST: RR  
 TOTAL Pb SPIKE: 200 mg/kg TOTAL Pb.  
 TOTAL Pb CV: 1.0 mg/L TOTAL Pb.

  
 \_\_\_\_\_  
 Director, Dr. Blair Leftwich

*3-18-98*  
 \_\_\_\_\_  
 DATE





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## *Highlander Environmental*

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Midland • Corpus Christi • San Angelo, Texas

September 22, 1992

Mr. Richard R. Myers  
Greenhill Petroleum  
11490 Westheimer, Suite 200  
Houston, TX 77077

**RE: Tank Bottom Material Reclamation and Treatment, Lovington, New Mexico**

Dear Mr. Myers,

This report details the findings of the Greenhill Petroleum waste disposal pit sampling performed on July 28, 1992 by Highlander Services personnel Tim Reed and Vijay Kurki. The three pits are on leases near Lovington, New Mexico, and all three pits contained B. S. & W. materials.

The North Pond and South Pond are located on one lease approximately 200 feet apart. The third pit, the Getty/Walker, is located two to three miles east of the North and South Ponds. The North and South Ponds are polyethylene-lined steel tanks 100 feet in diameter and four feet tall, open-topped but netted. The Getty/Walker is an unlined earth pit approximately 40 x 60 feet and four feet deep.

The North Pond and South Pond both had chloride and pH levels within acceptable levels. The TPH levels in these two ponds were high--596,000 mg/kg in the North Pond and 626,000 mg/kg in the South Pond.

The lead levels in the North Pond, 137 mg/kg, and in the South Pond, 64 mg/kg, are above the regulatory levels specified for landfill disposal, which is 50 mg/kg. However, the TCLP levels may be below the 5 mg/kg regulatory level. Typically, the reduction from total level to TCLP levels is anywhere from 10 to 20 times the total level. Also, the North Pond high level of 137 mg/kg may be partially due to lead in the fluid. The North Pond has more fluid than the South Pond. The lead levels may be lowered once the fluid is extracted from the pits, as discussed later in this report. All other metals tested were below detection limits.

The third pit, the Getty/Walker, also had high TPH of 334,000 mg/kg with high volatile organic compounds, the organic compounds being benzene, toluene, ethylbenzene, and xylene (BTEX). Arsenic was detected at 5 mg/kg and lead at 32 mg/kg, but neither should present any problems. No other metals or semi-volatile organics were detected. As with the other two pits, the chloride and pH levels were within acceptable limits. Copies of the laboratory reports and the chain of custody are enclosed in Appendix A.

All three of the pits are open-topped, allowing rainwater to enter, and requiring that any free water be pumped into a storage tank before any method of treatment can begin. Removing free water will reduce the overall volume of material to be treated and, consequently, the cost of treatment. Pumping the free water may also reduce the pit lead level, which will be especially important in the North Pond and South Pond, which have high lead levels.

The bottom of the North Pond is a loosely packed layer of sludge about 1 1/2 feet thick and 440 cubic yards volume, with a high water content. The middle layer of the pit is free water, about 1 to 1 1/2 feet thick and about 360 cubic yards in volume. The top is a hard paraffin layer 4 to 6 inches thick with a volume of 120 cubic yards and low water content.

The South Pond contains a single sludge layer of 1 1/2 feet with a volume of about 440 cubic yards.

The Getty/Walker pit has three layers, the bottom of which was about 2 1/2 feet of loose sludge approximately 223 cubic yards volume. The middle layer is about 6 inches of free water and 44 cubic yards volume. The top paraffin layer is four inches thick and has a volume of 30 cubic yards. The estimation of these volumes is presented in Table 1.

**Table 1**  
**Estimated Volume of Sludge Components**  
**North Tank (100 feet diameter)**

Description	Layer Thickness (average)	Volume (cubic yards)
Top paraffin layer	5 in.	121.00
Free water	1.25 ft.	363.00
Bottom loose sludge	1.50 ft.	436.00



**South Tank (100 feet diameter)**

Description	Layer Thickness (average)	Volume (cubic yards)
Total sludge	1.5 ft.	436.00

**Getty/Walker Pit (40 feet x 60 feet)**

Description	Layer Thickness (average)	Volume (cubic yards)
Top paraffin layer	4 in.	30.00
Free water	0.5 ft.	44.00
Bottom sludge	2.5 ft.	223.00

Based on the contamination findings of these three pits, the following remedial alternatives are proposed:

1. Transportation of sludge from all pits to an off-site disposal
2. Enhanced in-situ bio-remediation with micro-organisms
3. In-situ bio-remediation with indigenous bacteria

1. Transportation of the sludge to an off-site disposal facility will require moving the sludge either in barrels or a viscine lined truck to the nearest disposal facility. The nearest disposal facility is CRI, between Hobbs, New Mexico and Carlsbad, New Mexico. The estimated cost for this transportation and disposal is \$30,308, and does not include loading and unloading expenses. Another factor in considering off-site disposal is that the generator is liable for cleanup should problems occur at the disposal facility in the future. A cost estimate sheet is given in Attachment 1.

2. Enhanced in-situ bio-remediation involves adding micro-organisms and biocatalyst to the sludge while it remains in the tank. Inoculation fees for bacteria range from \$15 to \$20 per cubic yard. Enclosed in Appendix A is the Alpha West Inc. proposal concerning the cost of treating 2500 cubic yards. The actual sludge volume for three pits is about 1250 cubic yards, and based



on this estimated volume, this method of treatment would cost about \$29,900. After in-situ treatment, the waste must either be landfarmed or backfilled, which results in additional cost and is explained further in the next paragraph.

3. Natural biodegradation is the most common method of treatment. After removal of the free water in the tank, the residual sludge would be treated by land farming. The sludge would be sampled for Toxicity Characteristic Leaching Procedures (TCLP) before landfarming operations began. Landfarming involves thorough blending of the top soil at the site with the sludge and added nutrients. Every 30 days the blended soil and sludge would be tilled for aeration. The nutrients are added in calculated quantities during tilling to provide favorable conditions for indigenous bacteria. While biological degradation of hydrocarbon wastes has been used extensively by the petroleum industries, it is a slower process than enhanced bioremediation.

An evaluation assessment of the history, geology and hydrology of the site is required for the implementation of a successful bioremediation design plan. The necessity and amount of nutrients added to subsurface microorganisms for in-situ remediation is dependent upon the site hydrology. Sites with low permeability, such as those with clay, may not allow a successful introduction of nutrients.

A thorough laboratory assessment of the microbiology of the site also provides indicative information as to whether natural bioremediation will be successful. Some components of this laboratory assessment are:

- \* Evaluate the presence of requisite microorganisms
- \* Assess potential toxicity to the microorganisms
- \* Evaluate nutrient requirements to enhance degradation activity
- \* Evaluate the compatibility of the site geochemistry with the nutrient solution proposed for addition.

Natural biodegradation may be used based on the results of the laboratory assessment.

If the Oil Conservation Division of Santa Fe, New Mexico will not allow land farming, then the sludge can be treated by bio-venting with the use of a bio-cell. The bio-cell would



consist of a layer of one foot thick porous soil, or top soil available at the site, laid over a plastic sheet. It is strongly recommended that drainage pipes be installed for every 20 feet of the bio-cell. For this project, the bio-cell dimensions would be 150 feet by 150 feet. Bio-venting works on the same principles as natural biodegradation, but instead of the sludge being mixed with soil, the sludge is laid out over the bio-cell. The drainage pipes would be used for sludge venting after any water present in the sludge is drained out by gravity.

The Getty/Walker pit can be treated in-situ by adding micro-organisms to enhance the bioremediation and blending of the soil, or the sludge may be moved to the North Pond for treatment. If the sludge is moved from one lease to another, the New Mexico Oil Conservation Division (OCD) has to be notified for approval. Therefore, treatment of the Getty/Walker sludge in-situ might be more favorable. A sample form for the New Mexico OCD is attached at the end of this report.

The natural biodegradation method appears to be the most cost-effective method treatment for the North Pond and South Pond tank sludge. Highlander Services Corp. recommends drainage of any free water from the pits and subsequent injection of the free water into the deep injection wells operated by Greenhill Petroleum.

If you have any further questions involving the investigation or this report, please do not hesitate to call on us at once.

HIGHLANDER ENVIRONMENTAL CORP.



\_\_\_\_\_  
Tim Reed  
Vice President, Environmental Services



\_\_\_\_\_  
Vijay Kurki  
Hydrologist





# SOUTHWESTERN LABORATORIES

Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services  
1703 West Industrial Avenue • P.O. Box 2150 • Midland, Texas 79702

Report of tests on	Waste	File No.	6581000
Client	Highlander Services Corp.	Report No.	78575
Delivered by	Tim Reed	Report Date	8-18-92
		Date Received	7-29-92

Identification      Project No. 294, Greenhill Petroleum, Lovington,  
 Tank Bottoms Sampling, North Pond, Sampled 7-28-92  
 @ 1145 by Tim Reed.

## REPORT OF CHEMICAL ANALYSIS

<u>Parameters</u>	<u>Results</u>	<u>Date Performed</u>	<u>Analyst</u>	<u>Test Method</u>
Chloride, mg/kg (1:1 Water Extract)	284	8-3-92	W. Jaycox	SM 4500-C1,
pH (1:1)	6.97	8-3-92	W. Jaycox	SW846, 9040
Total Petroleum Hydrocarbons, mg/kg	596000	7-30-92	S. Stovall	EPA 418.1

\* Denotes "less than"

Copies: Highlander Services Corp.  
Attn: Tim Reed

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Report of tests on Waste  
Client Highlander Services Corp.  
Delivered by Tim Reed

File No. 6581000  
Report No. 78576  
Report Date 8-18-92  
Date Received 7-29-92

Identification Project No. 294, Greenhill Petroleum, Lovington,  
Tank Bottoms Sampling, South Pond, Sampled 7-28-92  
@ 1230 by Tim Reed.

## REPORT OF CHEMICAL ANALYSIS

<u>Parameters</u>	<u>Results</u>	<u>Date Performed</u>	<u>Analyst</u>	<u>Test Method</u>
Chloride, mg/kg (1:1 Water Extract)	284	8-3-92	W. Jaycox	SM 4500-C1,
pH (1:1)	6.69	8-3-92	W. Jaycox	SW846, 9040
Total Petroleum Hydrocarbons, mg/kg	626000	7-30-92	S. Stovall	EPA 418.1

\* Denotes "less than"

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Attn: Tim Reed

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Albert Johnston



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Report of tests on Waste  
Client Highlander Services Corp.  
Delivered by Tim Reed

File No. 6581000  
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Report Date 8-18-92  
Date Received 7-29-92

Identification Project No. 294, Greenhill Petroleum, Lovington,  
Tank Bottoms Sampling, South Pond, Sampled 7-28-92  
@ 1230 by Tim Reed.

## REPORT OF TOTAL METALS

<u>Parameters</u>	<u>Results mg/kg</u>	<u>Date Performed</u>	<u>Analyst</u>	<u>Test Method</u>
Arsenic	* 5.0	8-11-92	G. Bunch	SW846, 7061
Barium	* 20	8-17-92	G. Bunch	SW846, 7080
Cadmium	* 2.0	8-17-92	G. Bunch	SW846, 7130
Chromium	* 4.0	8-17-92	G. Bunch	SW846, 7190
Lead	64	8-17-92	G. Bunch	SW846, 7420
Mercury	* 0.40	8-12-92	G. Bunch	SW846, 7470
Selenium	* 1.5	8-11-92	G. Bunch	SW846, 7741
Silver	* 2.5	8-17-92	G. Bunch	SW846, 7760

\*Denotes "less than"

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Report of tests on Waste  
Client Highlander Services Corp.  
Delivered by Tim Reed

File No. 6581000  
Report No. 78577  
Report Date 8-18-92  
Date Received 7-29-92

Identification Project No. 294, Greenhill Petroleum, Lovington,  
Tank Bottoms Sampling, Getty/Walker, Sampled 7-28-92  
@ 1430 by Tim Reed.

## REPORT OF VOLATILE ORGANICS ANALYSIS

Date of Analysis 7-31-92 Method SW846, 5030/8240  
Technique Purge and Trap GC/MS Analyst R. Wright

Compound	ug/kg
Chloromethane	* 10900
Bromomethane	* 10900
Vinyl Chloride	* 10900
Chloroethane	* 10900
Methylene Chloride	* 5430
1,1-Dichloroethene	* 5430
1,1-Dichloroethane	* 5430
1,2-Dichloroethene (total)	* 5430
trans-1,2-Dichloroethene	* 5430
Chloroform	* 5430
1,2-Dichloroethane	* 5430
1,1,1-Trichloroethane	* 5430
Carbon Tetrachloride	* 5430
Bromodichloromethane	* 5430
1,2-Dichloropropane	* 5430
trans-1,3-Dichloropropene	* 5430
Trichloroethene	* 5430
Dibromochloromethane	* 5430
1,1,2-Trichloroethane	* 5430
Benzene	62000
cis-1,3-Dichloropropene	* 5430
2-Chloroethylvinylether	* 10900
Bromoform	* 5430
Tetrachloroethene	* 5430
1,1,2,2-Tetrachloroethane	* 5430
Toluene	165000
Chlorobenzene	* 5430
Ethylbenzene	126000
Total Xylenes	172000
Acrolein	* 54300
Acrylonitrile	* 54300

\*Denotes "less than"

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Tank Bottoms Sampling, Getty/Walker, Sampled 7-28-92
@ 1145 by Tim Reed.

REPORT OF ORGANICS ANALYSIS

Page 2 of 3

Table with 2 columns: Compound and ug/kg. Lists various organic compounds and their detection limits, such as Dimethyl Phthalate, Acenaphthylene, 2,6-Dinitrotoluene, etc.

\*Denotes "less than"

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Handwritten signature/initials

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