

3R - 273

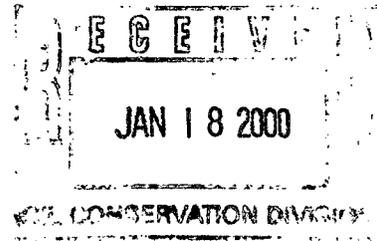
**GENERAL
CORRESPONDENCE**

YEAR(S):
2000 - 1995



January 11, 2000

New Mexico Oil Conservation Division
Mr. Bill Olson
2400 Pacheco Street
Sante Fe, NM 85730



Re: MKL #5
Section 6, T26N, R07W, NW/NE
Rio Arriba County, New Mexico

Please consider the enclosed data for "Final Closure" of pit and monitor well at this location.

Data has been gathered on this location from work done by either Louis Dreyfus Natural Gas personnel or by Contract Environmental Services, Inc., working under directions of LDNG personnel. This data includes a sundry notice, pit remediation and closure report, site diagram, and enclosures 1, 2, and 3 discussed below.

Our initial sampling of the monitor well was within limits outlined by State of New Mexico and BLM guidelines (See Enclosure #1). We received a verbal approval to cease sampling of these wells at that time. LDNG proposes to grout the sample well to surface and abandon.

Excavation was not complete, however a report (See Enclosure #2) from Contract Environmental Services shows that excavation was completed as far as possible without disturbing permanent equipment. Verbal approval was received from OCD and BLM to hold excavation at this point.

Our attention was then directed to the soil farms for remediation. Soil samples taken in July of 1998 show both of these soil farms are within limits of guidelines (See Enclosure #3).

Soil from soil farms will be used to contour location in standards for surrounding area and revegetate to BLM standards for the Largo Canyon area.

Soil samples tested below required 100 ppm in Gasoline and Diesel Ranges for both soil farms.

Supporting data for all lab analysis are enclosed and are true and accurate to the best of knowledge. If further information is required, please contact me at (915)387-5355.

Thank you

Tommy H. Arnwine
Environmental & Safety Director

cc: Gene Simer
OCD- Aztec-Denny Faust
BLM- Farmington- Bill Liese

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

FORM APPROVED
Budget Bureau No. 1004-0135
Expires: March 31, 1993

SUNDRY NOTICES AND REPORTS ON WELLS

Do not use this form for proposals to drill or to deepen or reentry to a different reservoir.
Use "APPLICATION FOR PERMIT—" for such proposals

SUBMIT IN TRIPLICATE

1. Type of Well

Oil Well Gas Well Other

2. Name of Operator

Louis Dreyfus Natural Gas

3. Address and Telephone No.

P.O. Box 370, Carlsbad, NM 88221

4. Location of Well (Footage, Sec., T., R., M., or Survey Description)

Sec 6, T26N, R07W,
NW/NE

5. Lease Designation and Serial No.

03353A

6. If Indian, Allottee or Tribe Name

7. If Unit or CA, Agreement Designation

8. Well Name and No.

MKL - #5

9. API Well No.

3003906727

10. Field and Pool, or Exploratory Area

Blanco

11. County or Parish, State

Rio Arriba, New Mexico

12. CHECK APPROPRIATE BOX(S) TO INDICATE NATURE OF NOTICE, REPORT, OR OTHER DATA

TYPE OF SUBMISSION	TYPE OF ACTION
<input type="checkbox"/> Notice of Intent	<input type="checkbox"/> Abandonment
<input type="checkbox"/> Subsequent Report	<input type="checkbox"/> Recompletion
<input type="checkbox"/> Final Abandonment Notice	<input type="checkbox"/> Plugging Back
	<input type="checkbox"/> Casing Repair
	<input type="checkbox"/> Altering Casing
	<input checked="" type="checkbox"/> Other <u>Final Pit Closure</u>
	<input type="checkbox"/> Change of Plans
	<input type="checkbox"/> New Construction
	<input type="checkbox"/> Non-Routine Fracturing
	<input type="checkbox"/> Water Shut-Off
	<input type="checkbox"/> Conversion to Injection
	<input type="checkbox"/> Dispose Water

(Note: Report results of multiple completion on Well Completion or Recompletion Report and Log form.)

13. Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work. If well is directionally drilled, give subsurface locations and measured and true vertical depths for all markers and zones pertinent to this work.)*

All Laboratory analysis for soil farms and ground water monitor well have proven within limits of guidelines. LDNG proposes the following leading to "final closure" of pit and monitor well:

- 1) Grout monitor well to top, cut off and abandon.
- 2) Contour soil farm to suit location drainage.
- 3) Rseed to BLM area requirements.

14. I hereby certify that the foregoing is true and correct

Signed [Signature] Title Environmental & Safety Director Date 1-11-2000

(This space for Federal or State office use)

Approved by _____ Title _____ Date _____
Conditions of approval, if any:

District I
P.O. Box 1920, Hobbs, NM
District II
P.O. Drawer DD,
District III
1000 Rio Brazos Rd., Aztec, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

SUBMIT 1 COPY TO
APPROPRIATE
DISTRICT OFFICE
AND 1 COPY TO
SANTE FE OFFICE

PIT REMEDIATION AND CLOSURE REPORT

Operator: Louis Dreyfus Natural Gas Telephone: (915)387-5355
Address: P.O. Box 525, Sonora, TX 76950
Facility Or: MKL #5
Well Name _____
Location Unit or Qtr/Qtr Sec Sec 6 T 26N R 07W County Rio Arriba
Pit Type: Separator Dehydrator Other _____
Land Type: BLM ,State _____, Fee _____, Other _____

Pit Location: Pit dimensions: length 40 , width 30 , depth 12
(Attach diagram)
Reference: wellhead X , Other _____
Footage from reference: 10
Direction from reference: Degrees 192° East North
of
West South

Depth To Ground Water:	Less than 50 feet	(20 points)	
(Vertical distance from	50 feet to 99 feet	(10 points)	
contaminants to seasonal	Greater than 100 feet	(0 points)	<u>20</u>
high water elevation of			
ground water)			

Wellhead Protection Area:	Yes	(20 points)	
(Less than 200 feet from a private	No	(0 points)	<u>0</u>
domestic water source, or; less than			
1000 feet from all other water sources			

Distance To Surface Water:	Less than 200 feet	(20 points)	
(Horizontal distance to perennial	200 feet to 1000 feet	(10 points)	
lakes, ponds, rivers, streams, creeks,	Greater than 1000 feet	(0 points)	<u>20</u>
irrigation canals and ditches)			

RANKING SCORE (TOTAL POINTS):

Date Remediation Started: 10-4-95 Date completed: 6-26-98

Remediation Method: Excavation X Approx. cubic yards 500
(Check all appropriate sections) Landfarmed X Insitu Bioremediation

Other

Remediation Location: Onsite X Offsite
(i.e. landfarmed onsite, name and location of offsite facility)

General Description of Remedial Action:

Placed excavated soil into two land farm areas. Turn soil and fertilize periodically and sample.

Ground Water Encountered: No X Yes Depth

Final Pit: Sample location

Closure Sampling: (if multiple samples, attach sample results and diagram of sample locations and depths) Sample depth Sample date Sample time

Sample Results See Enclosed

Benzene (ppm)

Total BTEX (ppm)

Field headspace (ppm)

TPH

Ground Water Sample: Yes X No (If yes, attach sample results)

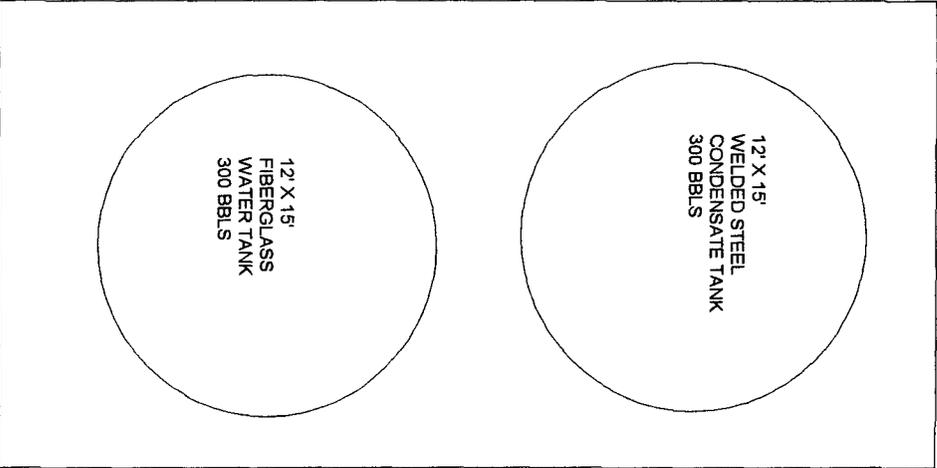
I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF

DATE 1-11-2000

SIGNATURE

PRINTED NAME Tommy H. Arnwine AND TITLE Environmental & Safety Director

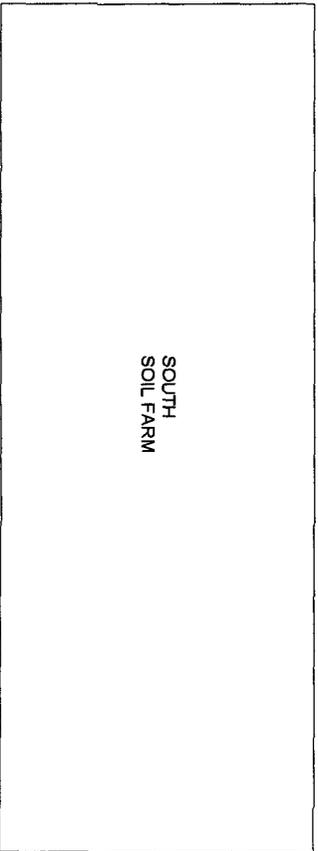
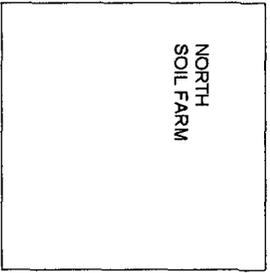
LOUIS DREYFUS NATURAL GAS
MKL #5
Section 6, T28N, R07W, NW/NE
Rio Arriba County, New Mexico



WELL



SEPARATOR



NOT TO SCALE

ENCLOSURE #1

MONITOR WELL

INFORMATION

ENCLOSURE #3

**SOIL FARM
INFORMATION**

ON SITE

CHAIN OF CUSTODY RECORD

5155

TECHNOLOGIES, LTD.

657 W. Maple • P. O. Box 2606 • Farmington NM 87499
 LAB: (505) 325-5667 • FAX: (505) 325-6256

Date: 6/19/98

Page 1 of 1

Purchase Order No.:		Job No.:							
Name: <u>Steven Adams</u>									
Company: <u>Contract Env. Services, Inc.</u> Dept.:									
Address: <u>P.O. Box 3376</u>									
City, State, Zip: <u>Farmington NM 87499</u>									
SEND INVOICE TO									
Sampling Location: <u>FEDERAL 6-32</u>									
MULES									
MULE-5A									
Sampler: <u>SIDAMMS</u>									
SAMPLE IDENTIFICATION	SAMPLE		MATRIX	PRES.	Number of Containers	REPORT RESULTS TO			
	DATE	TIME				Name	Company	Mailing Address	City, State, Zip
FL32-300 Soil Farm Section	6/19/98	10:30	Soil	Yes	1	UO?	FEA	PI?	LAB ID
FL32-301 Soil Farm Admnty	"	10:35	"	"	1	UO?	FEA	PI?	LAB ID
MULES-302 Soil Farm Admnty	"	11:00	"	"	1	UO?	FEA	PI?	LAB ID
MULES-303 Soil Farm Sectz	"	11:05	"	"	1	UO?	FEA	PI?	LAB ID
MULES-304 Soil Farm Camp	"	11:20	"	"	1	UO?	FEA	PI?	LAB ID
Received by: <u>Steven Adams</u> Date/Time: <u>6/19/98</u> 1:08 Received by: <u>Heidi K...</u> Date/Time: <u>6/19/98</u>						Rush <input type="checkbox"/> 24-48 Hours <input checked="" type="checkbox"/> 10 Working Days Special Instructions: <u>CTA</u>			
Relinquished by: <u>Steven Adams</u> Date/Time: <u>6/19/98</u> Relinquished by: _____ Date/Time: _____						Method of Shipment: <u>CTA</u> Date: <u>6/19</u> Authorized by: _____ Date: _____ (Client Signature Must Accompany Request)			

OFF: (505) 325-5667



LAB: (505) 325-1556

ANALYTICAL REPORT

Date: 30-Jun-98

Client: Contract Environmental Services, Inc.	Client Sample Info: MKL-5
Work Order: 9806081	Client Sample ID: MKL5-303 Soil Farm South
Lab ID: 9806081-04A Matrix: SOIL	Collection Date: 6/18/98 11:05:00 AM
Project: Soil Farms	COC Record: 5155

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
DIESEL RANGE ORGANICS		EW8615				Analyst: HR
T/R Hydrocarbons: C10-C28	94	25		mg/Kg	1	6/29/98
GASOLINE RANGE ORGANICS		EW8615				Analyst: DC
T/R Hydrocarbons: C6-C10	ND	0.18		mg/Kg	1	6/23/98

Qualifiers:	PQL - Practical Quantitation Limit	S - Spike Recovery outside accepted recovery limits
	ND - Not Detected at Practical Quantitation Limit	R - RPD outside accepted recovery limits
	J - Analyte detected below Practical Quantitation Limit	E - Value above quantitation range
	B - Analyte detected in the associated Method Blank	Surr: - Surrogate

On Site Technologies, LTD.

Date: 24-Sep-99

CLIENT: Contract Environmental Services, Inc.
Work Order: 9806081
Project: Soil Farms

QC SUMMARY REPORT
Method Blank

Sample ID: MB1 Batch ID: GC-2_980626 Test Code: SW8015B Units: mg/kg Analysis Date: 6/26/98 Prep Date: 6/26/98
Client ID: 9806081 Run ID: GC-2_980626B SeqNo: 3630
Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C10-C28 ND 25

Qualifiers: ND - Not Detected at the Reporting Limit S - Spike Recovery outside accepted recovery limits B - Analyte detected in the associated Method Blank
J - Analyte detected below quantitation limits R - RPD outside accepted recovery limits

On Site Technologies, LTD.

Date: 24-Sep-99

CLIENT: Contract Environmental Services, Inc.
Work Order: 9806081
Project: Soil Farms

QCC SUMMARY REPORT
Sample Duplicate

Sample ID: 9806075-04AD Batch ID: GC-2_980626 Test Code: SW8015B Units: mg/Kg Analysis Date: 6/27/98 Prep Date: 6/27/98

Client ID: 9806081 Run ID: GC-2_980626B SeqNo: 3653

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
T/R Hydrocarbons: C10-C28	1844	25	0	0	0.0%	0	0	1790	3.0%	15	

Qualifiers: ND - Not Detected at the Reporting Limit

J - Analyte detected below quantitation limits

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

B - Analyte detected in the associated Method Blank

On Site Technologies, LTD.

Date: 24-Sep-99

CLIENT: Contract Environmental Services, Inc.
Work Order: 9806081
Project: Soil Farms

QC SUMMARY REPORT
Sample Matrix Spike

Sample ID: 9806074-06AMS	Batch ID: GC-2_980626	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/29/98	Prep Date: 6/29/98						
Client ID: 9806081	Run ID: GC-2_980626B	SeqNo: 3654									
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
T/R Hydrocarbons: C10-C28	527.2	25	502	0	105.0%	70	130				

Qualifiers: NID - Not Detected at the Reporting Limit S - Spike Recovery outside accepted recovery limits B - Analyte detected in the associated Method Blank
 J - Analyte detected below quantitation limits R - RPD outside accepted recovery limits

On Site Technologies, LTD.

Date: 24-Sep-99

CLIENT: Contract Environmental Services, Inc.
Work Order: 9806081
Project: Soil Farms

QC SUMMARY REPORT
Laboratory Control Spike - generic

Sample ID: LCS	Batch ID: GC-2_980626	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/27/98	Prep Date: 6/26/98						
Client ID: 9806081	Run ID: GC-2_980626B	SeqNo: 3632									
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
T/R Hydrocarbons: C10-C28	529.9	25	502	0	105.6%	70	130				

Qualifiers:

NID - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits

S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits

B - Analyte detected in the associated Method Blank

On Site Technologies, LTD.

Date: 24-Sep-99

CLIENT: Contract Environmental Services, Inc.
Work Order: 9806081
Project: Soil Farms

QC SUMMARY REPORT

Continuing Calibration Verification Standard

Sample ID:	Batch ID:	Test Code:	SW8015B	Units:	mg/Kg	Analysis Date:	6/26/98	Prep Date:			
Client ID:	9806081	Run ID:	GC-2_980626B	SeqNo:	3631						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
T/R Hydrocarbons:	C10-C28	492.9	25	502	0	98.2%	85	115			
Sample ID:	GCV1 QC0602	Batch ID:	GC-2_980626	Test Code:	SW8015B	Units:	mg/Kg	Analysis Date:	6/27/98	Prep Date:	
Client ID:	9806081	Run ID:	GC-2_980626B	SeqNo:	3655						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
T/R Hydrocarbons:	C10-C28	522.5	25	502	0	104.1%	85	115			
Sample ID:	CCV3 QC0602	Batch ID:	GC-2_980626	Test Code:	SW8015B	Units:	mg/Kg	Analysis Date:	6/27/98	Prep Date:	
Client ID:	9806081	Run ID:	GC-2_980626B	SeqNo:	3656						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
T/R Hydrocarbons:	C10-C28	490	25	502	0	97.6%	85	115			
Sample ID:	CCV4 QC0602	Batch ID:	GC-2_980626	Test Code:	SW8015B	Units:	mg/Kg	Analysis Date:	6/29/98	Prep Date:	
Client ID:	9806081	Run ID:	GC-2_980626B	SeqNo:	3657						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
T/R Hydrocarbons:	C10-C28	545.9	25	502	0	108.7%	85	115			
Sample ID:	CCV5 QC0602	Batch ID:	GC-2_980626	Test Code:	SW8015B	Units:	mg/Kg	Analysis Date:	6/29/98	Prep Date:	
Client ID:	9806081	Run ID:	GC-2_980626B	SeqNo:	3658						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
T/R Hydrocarbons:	C10-C28	520.2	25	502	0	103.6%	85	115			

Qualifiers: NID - Not Detected at the Reporting Limit S - Spike Recovery outside accepted recovery limits B - Analyte detected in the associated Method Blank
 J - Analyte detected below quantitation limits R - RPD outside accepted recovery limits

On Site Technologies, LTD.

Date: 24-Sep-99

CLIENT: Contract Environmental Services, Inc.
Work Order: 9806081
Project: Soil Farms

QC SUMMARY REPORT
Method Blank

Sample ID: MB1 Batch ID: GC-1_980623 Test Code: SW8015B Units: mg/kg Analysis Date: 6/23/98 Prep Date:
Client ID: 9806081 Run ID: GC-1_980623A SeqNo: 3474
Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C6-C10 .026 0.18 J

Qualifiers: ND - Not Detected at the Reporting Limit S - Spike Recovery outside accepted recovery limits B - Analyte detected in the associated Method Blank
J - Analyte detected below quantitation limits R - RPD outside accepted recovery limits

On Site Technologies, LTD.

Date: 24-Sep-99

CLIENT: Contract Environmental Services, Inc.
 Work Order: 9806081
 Project: Soil Farms

QC SUMMARY REPORT
 Sample Matrix Spike

Sample ID: 9806087-02AMS Batch ID: GC-1_980623 Test Code: SW8015B Units: mg/Kg Analysis Date: 6/23/98 Prep Date:
 Client ID: 9806081 Run ID: GC-1_980623A SeqNo: 3498
 Analyte Result PQL SPK value SPK Ret Val %REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
 T/R Hydrocarbons: C6-C10 1.496 0.18 1.801 0 83.1% 52 123

Sample ID: 9806087-02AMS Batch ID: GC-1_980623 Test Code: SW8015B Units: mg/Kg Analysis Date: 6/23/98 Prep Date:
 Client ID: 9806081 Run ID: GC-1_980623A SeqNo: 3499
 Analyte Result PQL SPK value SPK Ret Val %REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
 T/R Hydrocarbons: C6-C10 1.395 0.18 1.801 0 77.5% 52 123

Qualifiers: NID - Not Detected at the Reporting Limit S - Spike Recovery outside accepted recovery limits B - Analyte detected in the associated Method Blank
 J - Analyte detected below quantitation limits R - RPD outside accepted recovery limits

On Site Technologies, LTD.

Date: 24-Sep-99

CLIENT: Contract Environmental Services, Inc.
Work Order: 9806081
Project: Soil Farms

QC SUMMARY REPORT
Laboratory Control Spike - generic

Sample ID: LCS Batch ID: GC-1_980623 Test Code: SW8015B Units: mg/Kg Analysis Date: 6/23/98 Prep Date:
Client ID: 9806081 Run ID: GC-1_980623A SeqNo: 3476
Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit RPD Ref Val %RPD RPDLimit Qual
T/R Hydrocarbons: C6-C10 1.851 0.18 1.801 0.03 101.1% 52 123

Qualifiers: ND - Not Detected at the Reporting Limit S - Spike Recovery outside accepted recovery limits B - Analyte detected in the associated Method Blank
J - Analyte detected below quantitation limits R - RPD outside accepted recovery limits

On Site Technologies, LTD.

Date: 24-Sep-99

CLIENT: Contract Environmental Services, Inc.
 Work Order: 9806081
 Project: Soil Farms

QC SUMMARY REPORT

Continuing Calibration Verification Standard

Sample ID: CCV1 QC0593	Batch ID: GC-1_980623	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/23/98	Prep Date:						
Client ID: 9806081	Run ID: GC-1_980623A			SeqNo: 3475							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
T/R Hydrocarbons: C6-C10	1.835	0.18	1.801	0	101.9%	85	115				
Trifluorotoluene	.0769	0	0.08	0	96.1%	70	130				

Sample ID: CCV2 QC0593	Batch ID: GC-1_980623	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/23/98	Prep Date:						
Client ID: 9806081	Run ID: GC-1_980623A			SeqNo: 3489							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
T/R Hydrocarbons: C6-C10	1.686	0.18	1.801	0	93.6%	85	115				
Trifluorotoluene	.0777	0	0.08	0	97.1%	70	130				

Sample ID: CCV3 QC0593	Batch ID: GC-1_980623	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/23/98	Prep Date:						
Client ID: 9806081	Run ID: GC-1_980623A			SeqNo: 3497							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
T/R Hydrocarbons: C6-C10	1.525	0.18	1.801	0	84.7%	85	115				
Trifluorotoluene	.0754	0	0.08	0	94.2%	70	130				

Sample ID: CCV4 QC0593	Batch ID: GC-1_980623	Test Code: SW8015B	Units: mg/Kg	Analysis Date: 6/23/98	Prep Date:						
Client ID: 9806081	Run ID: GC-1_980623A			SeqNo: 3500							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
T/R Hydrocarbons: C6-C10	1.806	0.18	1.801	0	100.3%	85	115				
Trifluorotoluene	.0756	0	0.08	0	94.5%	70	130				

Qualifiers: ND - Not Detected at the Reporting Limit
 S - Spike Recovery outside accepted recovery limits
 B - Analyte detected in the associated Method Blank
 J - Analyte detected below quantitation limits
 R - RPD outside accepted recovery limits

S *CONFIRMED*
w/CCV4
9/24/99

OFF: (505) 325-5667



LAB: (505) 325-1556

TOTAL PETROLEUM HYDROCARBONS

Attn: *Shawn Adams*
 Company: *Contract Environmental Services, Inc.*
 Address: *P.O. Box 505*
 City, State: *Kirtland, NM 87417*

Date: *27-Sep-96*
 COC No.: *4307*
 Sample No. *12357*
 Job No. *2-1000*

Project Name: *MKL #5*
 Project Location: *MKL5-200*
 Sampled by: *SA*
 Analyzed by: *HR*
 Sample Matrix: *Soil*

Date: *26-Sep-96* Time: *14:42*
 Date: *27-Sep-96*

Laboratory Analysis

<i>Parameter</i>	<i>Result</i>	<i>Detection Limit</i>	<i>Unit of Measure</i>	<i>Method</i>
<i>Total Petroleum Hydrocarbons, TPH</i>	<i>1079</i>	<i>25</i>	<i>mg/kg</i>	<i>EPA Method 418.1</i>

Quality Assurance Report

Laboratory Fortified Blank/Spike Soil

<i>Laboratory Identification</i>	<i>Analyzed Value</i>	<i>Acceptable Range</i>	<i>Unit of Measure</i>
<i>Laboratory Fortified Blank Soil - QCBS2</i>	<i><25</i>	<i><25</i>	<i>mg/kg</i>
<i>Laboratory Fortified Spike Soil - QCSS1</i>	<i>893</i>	<i>828 - 1024</i>	<i>mg/kg</i>

Duplication

<i>Laboratory Identification</i>	<i>(% RSD)</i>	<i>Limit (% RSD)</i>
<i>12357-4307</i>	<i>1.7</i>	<i>15.0</i>

Approved by: *[Signature]*
 Date: *9/30/96*

OFF: (505) 325-5667



LAB: (505) 325-1556

AROMATIC VOLATILE ORGANICS

Attn: *Shawn Adams*
 Company: *Contract Environmental Services, Inc.*
 Address: *P.O. Box 505*
 City, State: *Kirtland, NM 87417*

Date: 1-Oct-96
 COC No.: 4307
 Sample No. 12357
 Job No. 2-1000

Project Name: **MKL #5**
 Project Location: **MKL5-200**
 Sampled by: SA
 Analyzed by: DC
 Sample Matrix: *Soil*

Date: 26-Sep-96 Time: 14:42
 Date: 30-Sep-96

Laboratory Analysis

<i>Parameter</i>	<i>Result</i>	<i>Units of Measure</i>	<i>Detection Limit</i>	<i>Units of Measure</i>
<i>Benzene</i>	6.9	ug/kg	0.2	ug/kg
<i>Toluene</i>	14.7	ug/kg	0.2	ug/kg
<i>Ethylbenzene</i>	6.3	ug/kg	0.2	ug/kg
<i>m,p-Xylene</i>	33.7	ug/kg	0.2	ug/kg
<i>o-Xylene</i>	16.7	ug/kg	0.2	ug/kg
	TOTAL	78.3		ug/kg

Method - SW-846 EPA Method 8020 Aromatic Volatile Organics by Gas Chromatography

Approved by: 
 Date: 10/1/96

Contract Environmental Services, Inc.
Post Office Box 505
Kirtland, New Mexico 87417-0505
Phone (505) 325-1198

January 21, 1996

Louis Dreyfus Natural Gas Co.
Mr. Gene Simer
Post Office Box 370
Carlsbad, New Mexico 88221

RE: MKL-5 (Sec 06, T26N, R07W) Monitor Well

Dear Mr. Simer,

Contract Environmental Services, Inc. (CES) is pleased to present this letter report on the installation of a monitoring well for the MKL-5 well location. This report includes background information, scope of services, field test data, laboratory data, conclusions and recommendations.

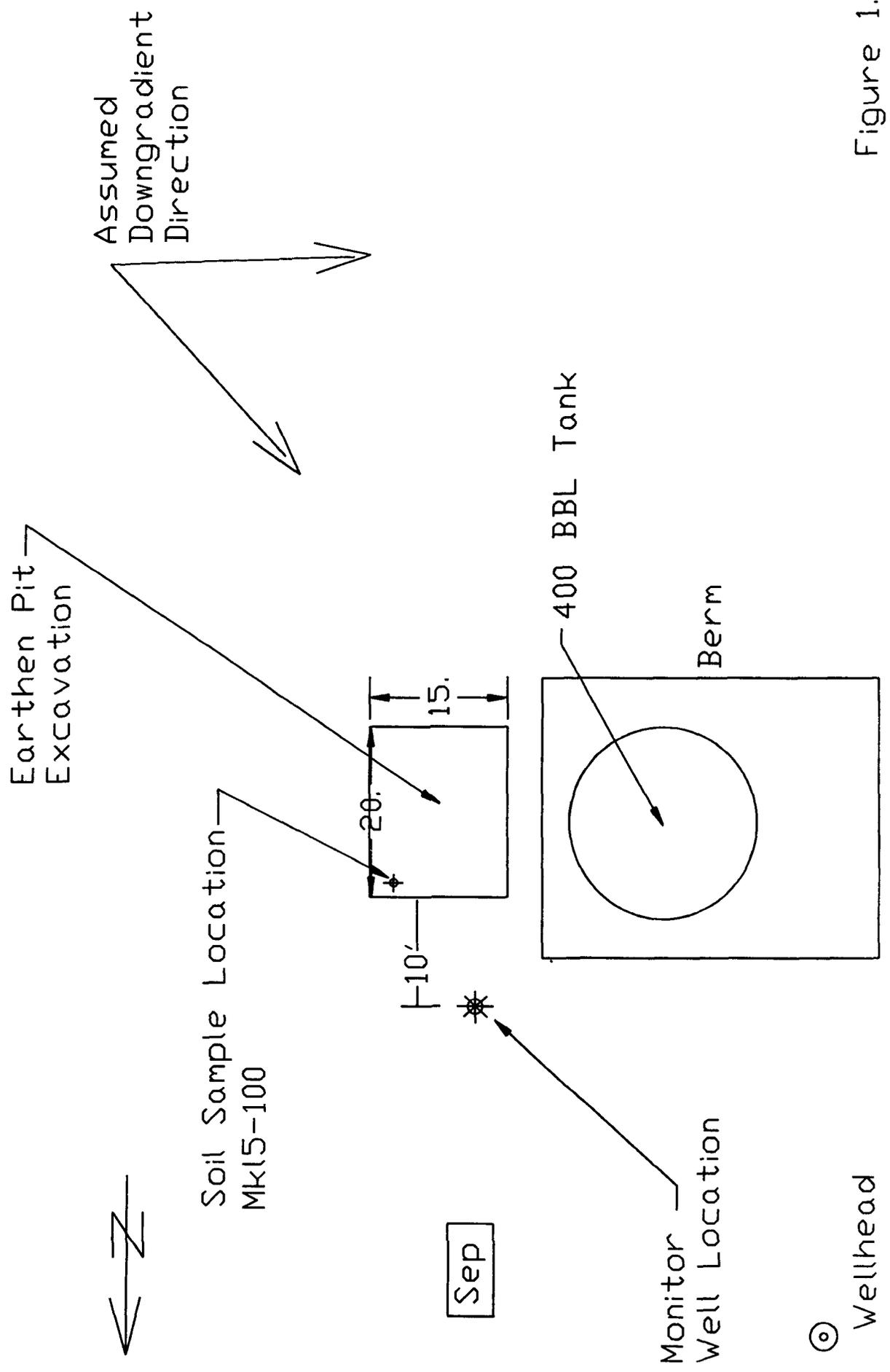
Background Information

On October 4, 1995 CES began excavating contaminated soil from the separator pit on the above referenced well location. The excavation was recently completed with an approximate 150 cubic yards of contaminated soil removed. The soil removed was evenly distributed on the surface where it could be soil farmed until remediated. On October 19, 1995 CES issued a technical report presenting the findings of this investigation. On December 4, 1995 CES installed one monitor well in the anticipated downgradient direction from the excavation. The following day the monitor well was developed and sampled.

Scope Of Services

CES with the help of Phillip Environmental installed the monitor well to a depth of approximately 37 feet. The monitor well is located 10' from the northwest corner of the excavation (Please see attached Figure 1). The bottom 15' of the 4" PVC pipe was slotted (Please see attached Figure 2) and the top 22' was completed with unscreened PVC pipe. The bottom of the monitor well has a 4" screw-on plug that prevents sediments from entering the bottom of the well. All of the joints were composed of screw-together threads. Silica sand was backfilled 2' above the slotted interval. Above the sand a 2' bentonite plug was placed. The remainder of the open hole was grouted to within 2' of groundlevel. From this point to the surface, the PVC pipe was cemented in place. A riser was left on the monitoring well approximately 3' above ground level. T-posts and fluorescent flagging was placed on all sides of the monitor well to protect it before leaving.

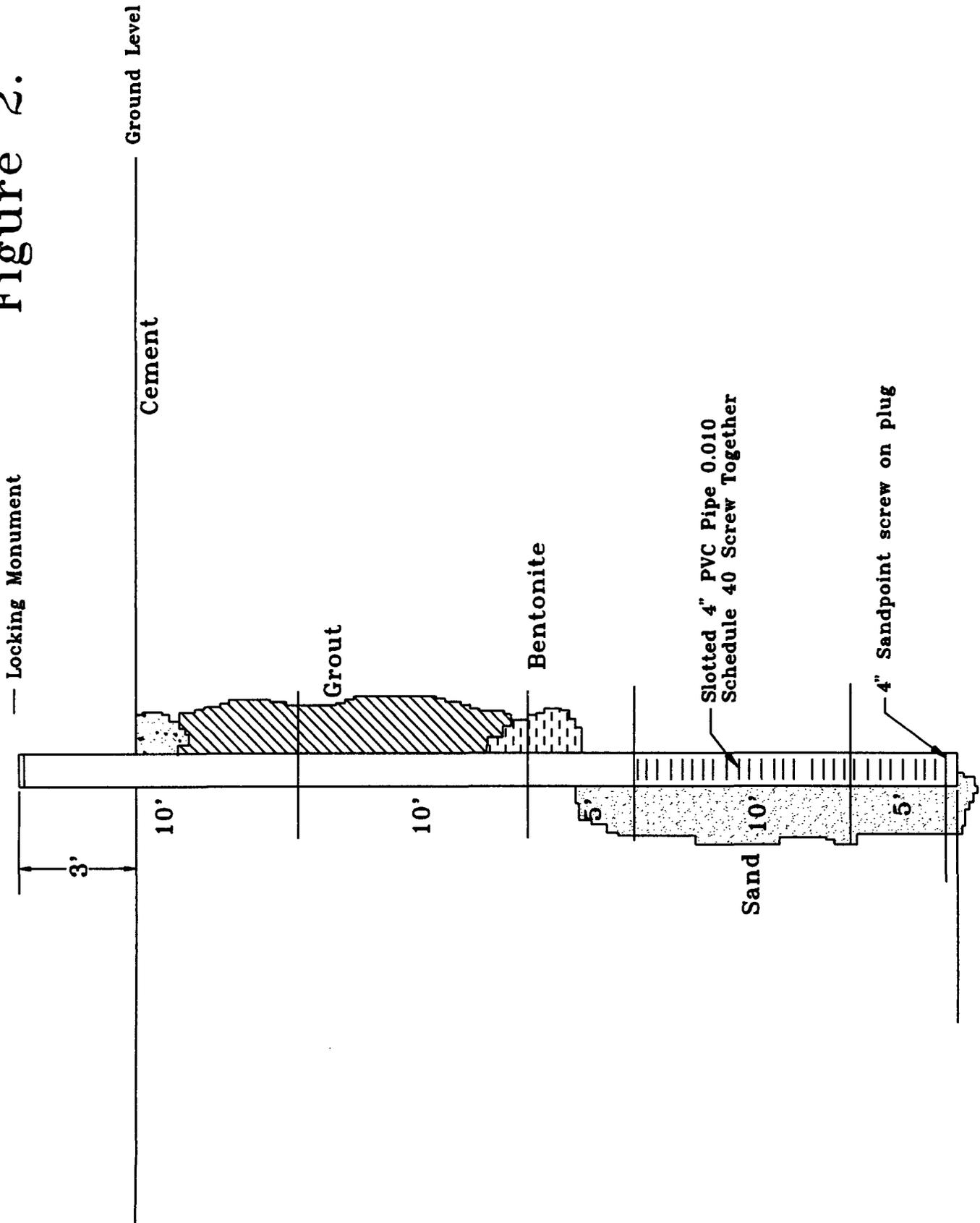
The monitor well was developed until the muddy water cleared up prior to sampling. An estimated five volumes of water were removed before collection for laboratory analyses. Water samples were gathered to be analyzed for Benzene, Toluene, Ethylbenzene, Xylenes (BTEX); Metals; Cations / Anions; and Polyaromatic Hydrocarbons (PAH). All water was analyzed using EPA Test Methods.



⊙ Wellhead

Figure 1.

Figure 2.



During the drilling operations, soil samples were gathered approximately every 5' of depth. Samples were collected from split-spoon samplers driven 24" into the soil. The soil was placed in baggies and tested with the PID Meter for hydrocarbons. The depth to water from the top of the casing riser measured 18'-9 5/8". Considering the height of the riser, that makes the first measured depth to groundwater approximately 15'-9".

Field Test Data

Field data collected during the drilling process included soil samples tested with a Photo-Ionization Detector (PID) Meter. The field data gathered is presented in the following Table.

Table 1-1.

Sample No.	Depth	PID(PPM)
1	3.5-5.5'	2.1
2	8.5-10.5'	7.9

Laboratory Data

The laboratory data gathered is summarized in the following Table. Individual laboratory reports are attached for your viewing.

Table 1-2.

Sample No.	Description	(Units)	
MKL5-408	BTEX EPA Method 602.2	B	ND PPB
		T	0.99 PPB
		E	0.54 PPB
		X	3.19 PPB
MKL5-409	Metals EPA Method 600/4	Arsenic	<0.005 PPM
		Barium	<0.25 PPM
		Cadmium	<0.002 PPM
		Chromium	<0.02 PPM
		Lead	<0.005 PPM
		Mercury	<0.001 PPM
		Selenium	<0.005 PPM
		Silver	<0.01 PPM
MKL5-411	Cation / Anion EPA Method 8310	Total Hardness	202 PPM
		Calcium	60.7 PPM
		Magnesium	12.3 PPM
		Potassium	6.0 PPM
		Sodium	550 PPM
		Iron	0.06 PPM
		Total Alkalinity	397 PPM
		Bicarbonate	397 PPM
		Chloride	20.0 PPM
		Sulfate	981 PPM

Cation / Anion Difference = 1.44

MKL5-410

Polynuclear Aromatic Hydrocarbons

Acenaphthene	<2.13	PPB
Acenaphthylene	<3.74	PPB
Anthracene	<1.49	PPB
Benzo(a)anthracene	<0.88	PPB
Benzo(a)pyrene	<0.39	PPB
Benzo(b)fluoranthene	<0.19	PPB
Benzo(k)Fluoranthene	<0.34	PPB
Benzo(ghi)perylene	<1.23	PPB
Chrysene	<0.88	PPB
Dibenzo(a,h)anthracene	<0.72	PPB
Fluoranthene	<0.15	PPB
Fluorene	<1.29	PPB
Indeno(1,2,3-cd)pyrene	<1.05	PPB
Naphthalene	<5.82	PPB
Phenanthrene	<1.22	PPB
Pyrene	<0.13	PPB

Conclusions

Water data for BTEX was below New Mexico Drinking Water Standards as outlined in NMED Drinking Water Regulations (Title 20, Chapter 7, Part 1). Large numbers were found in the following concentrations, Sodium, Alkalinity, Sulfate. These values are to be considered normal for water found in a wash bottom such as this.

Recommendations

As confirmed with NMOCD, CES recommends that a second interval of BTEX water analyses should be collected from the monitor well within 60 days. If the BTEX concentration is below groundwater standards as found in this first interval, the monitoring well should be grouted to the surface and abandoned. "No Further Action" would be applied for to NMOCD for groundwater remediation. The contaminated soil in the soil farm should be regularly tilled as the weather warms until it has been reduced to less than 100 PPM from a laboratory TPH analysis. The excavation could then be backfilled and a "Closure Package" prepared for distribution to NMOCD.

Contract Environmental Services, Inc. appreciates this opportunity to present this letter report on the MKL-5 to Louis Dreyfus Natural Gas. If you have questions or require additional information, please don't hesitate to contact our offices at (505) 325-1198 or stop by at 4200 Hawkins Road, Farmington.

Sincerely,



Shawn A. Adams
Contract Environmental Services, Inc.

PURGEABLE AROMATICS

Contract Environmental Services, Inc.

Project ID: Largo Wells
Sample ID: 408 - 411
Lab ID: 2067
Sample Matrix: Water
Preservative: Cool
Condition: Intact

Report Date: 12/09/95
Date Sampled: 12/05/95
Date Received: 12/05/95
Date Analyzed: 12/08/95

Target Analyte	Concentration (ug/L)	Detection Limit (ug/L)
Benzene	ND	0.50
Toluene	0.99	0.50
Ethylbenzene	0.54	0.50
m,p-Xylenes	2.66	1.00
o-Xylene	0.53	0.50
Total BTEX	4.71	

ND - Analyte not detected at the stated detection limit.

Quality Control:	Surrogate	Percent Recovery	Acceptance Limits
	Trifluorotoluene	101	88 - 110%
	Bromofluorobenzene	87	86 - 115%

Reference: Method 602.2, Purgeable Aromatics; Federal Register, Vol. 49, No. 209, Oct. 1984.

Comments:


Analyst


Review

Total Metals Analysis Contract Environmental Services, Inc.

Project ID:	Largo Wells	Date Reported:	01/09/96
Sample ID:	408 - 411	Date Sampled:	12/05/95
Laboratory ID:	2067	Time Sampled:	NA
Sample Matrix:	Water	Date Received:	12/05/95

Parameter	Analytical Result (mg/L)	Units
-----------	--------------------------	-------

Trace Metals

Arsenic.....	< 0.005	mg/L
Barium.....	< 0.25	mg/L
Cadmium.....	< 0.002	mg/L
Chromium.....	< 0.02	mg/L
Lead.....	< 0.005	mg/L
Mercury.....	< 0.001	mg/L
Selenium.....	< 0.005	mg/L
Silver.....	< 0.01	mg/L

Reference: U.S.E.P.A. 600/4-79-020, Methods for Chemical Analysis of Water and Wastes, 1983.
Standard Methods For The Examination Of Water And Wastewater, 18th ed., 1992.

Comments:



Review

API Suite Contract Environmental Services, Inc.

Project ID:	Largo Wells	Date Reported:	01/09/96
Sample ID:	408 - 411	Date Sampled:	12/05/95
Laboratory ID:	2067	Time Sampled:	NA
Sample Matrix:	Water	Date Received:	12/05/95

Parameter	Analytical Result	Units
General		
Lab pH.....	7.9	s.u.
Lab Conductivity @ 25° C.....	2,580	µmhos/cm
Total Dissolved Solids @ 180°C.....	1,870	mg/L
Total Dissolved Solids (Calc).....	1,870	mg/L
Specific Gravity.....	1.010	***
Anions		
Total Alkalinity as CaCO ₃	397	mg/L
Bicarbonate Alkalinity as CaCO ₃	397	mg/L
Carbonate Alkalinity as CaCO ₃	NA	mg/L
Hydroxide Alkalinity as CaCO ₃	NA	mg/L
Chloride.....	20.0	mg/L
Sulfate.....	981	mg/L
Nitrate + Nitrite - N.....	NA	
Nitrate - N.....	NA	
Nitrite - N.....	NA	
Cations		
Total Hardness as CaCO ₃	202	mg/L
Calcium.....	60.7	mg/L
Magnesium.....	12.3	mg/L
Potassium.....	6.0	mg/L
Sodium.....	550	mg/L
Iron.....	0.06	mg/L
Data Validation		<u>Acceptance Level</u>
Cation/Anion Difference.....	1.44	+/- 5 %
TDS (180):TDS (calculated).....	1.0	1.0 - 1.2

Reference U.S.E.P.A. 600/4-79-020, Methods for Chemical Analysis of Water and Wastes, 1983.
Standard Methods For The Examination Of Water And Wastewater, 18th ed., 1992.



Review

ENCLOSURE #2

PIT EXCAVATION

INFORMATION

Contract Environmental Services, Inc.
Post Office Box 505
Kirtland, New Mexico 87417-0505
Phone (505) 325-1198

October 19, 1995

New Mexico Oil Conservation Division
Mr. Bill Olson
2400 Pacheco Street
Santa Fe, New Mexico 85730

RE: Louis Dreyfus Natural Gas Corporation, MKL #5, Sec 6, T26N, R07W NW/NE, Rio Arriba
County, New Mexico

Dear Mr. Olson,

Contract Environmental Services, Inc. (CES) is pleased to present this "Plan of Action" for the MKL #5 well location on behalf of Louis Dreyfus Natural Gas Corporation (LDNG). This plan contains background information, current site assessment data, a site plan, conclusions and a "Plan of Action".

Background Information

On October 4, 1995 CES began excavating the soil immediately below the earthen pit. As soils were removed from the excavation, periodic samples were gathered to be analyzed using a Photo-Ionization Detector (PID) meter. Soils removed were transferred to another portion of the wellpad to establish a soil farm for continued remediation. These soils were spread on the wellpad some 6" to 12" in depth to allow for aeration and the release of volatile aromatic hydrocarbons.

Approximately 70 cubic yards of contaminated soil was removed from the excavation during the excavation process. At a depth of 17' a field PID soil sample indicated that the contaminated soil had not been removed. A confirmation laboratory soil sample was gathered to be processed for Total Petroleum Hydrocarbons (TPH) using EPA Method 418.1. This laboratory soil analysis confirmed that uncontaminated soil had not been reached. The remainder of the pit area was "Cleaned Out" to this same depth. It is anticipated that not all contamination was removed from the bottom and walls of the excavation.

On the west side of the excavation there is a berm and fence line surrounding a storage tank that prevents removing all contaminated material. Leaving the excavation open for an extended period of time will enable the contaminated soil in the wall to remediate as well.

The following is field PID data collected during the removal process.

Center Of Earthen Pit

PID Field Data Collected

<u>Depth</u>	<u>Sample No.</u>	<u>PID(PPM)</u>	<u>Location</u>
4'	#1	2000+	Center of Pit
7'	#2	2000+	Center of Pit
17'	#3	2000+	Center of Pit

Laboratory Data Collected

<u>Depth</u>	<u>Sample No.</u>	<u>PID(PPM)</u>	<u>Location</u>
17'	MKL5-100	2970	Center of Pit

Conclusions

Soil contamination in the excavation continued beyond the digging ability of the equipment. Remaining wall contamination will remediate while the excavation remains open during the soil remediation process. CES believes that LDNG has not adequately removed the contaminated soil or sufficiently defined the vertical extent of contamination. CES ranks this site at 100 PPM cleanup score with a maximum benzene level of 10 PPM. The amount of impact to the groundwater is unknown at this point.

Plan of Action

Continue removing the contaminated soils from the excavation, move in a lateral direction testing the excavation walls as the digging proceeds. Remove the contamination in the excavation walls until the PID Meter indicates below 100 PPM. Remediate the soils contained in the soil farm to below 100 PPM laboratory TPH by EPA Method 418.1 or 8015 Modified for gas and diesel. Auger in a monitor well approximately 5' into the groundwater in a downgradient direction from the excavation. A water sample will be collected from this monitor well after the standard 3 volumes of water have been extracted. The water sample will be analyzed for Benzene, Toluene, Ethylbenzene and Xylenes (BTEX) using EPA Method 8020. Return the remediated soils to the pit area as backfill and slightly dome the area to prevent water ponding. In addition, the soils will be checked for contamination approximately every 4' during the drilling process while installing the monitor well. A report on the finding will be presented to NMOCD for their records.

Contract Environmental Services, Inc. appreciates this opportunity to present this "Plan of Action" on behalf of Louis Dreyfus Natural Gas Corporation. If you have questions or require additional information, please don't hesitate to contact our offices at (505) 325-1198 or stop by at 4200 Hawkins Road, Farmington.

Sincerely,

Shawn A. Adams
Contract Environmental Services, Inc.

cc: Mr. Denny Foust, NMOCD Farmington
Mr. Bill Liese, BLM Farmington

TECHNOLOGIES, LTD.

657 W. Maple • P. O. Box 2606 • Farmington NM 87499
LAB: (505) 325-5667 • FAX: (505) 325-6256

Date: 9/27/96

Page 1 of 1

Purchase Order No.:

Job No.

SEND INVOICE TO

Name: STANLEY ADAMS
Company: CONCRETE ENVIRONMENTAL SERVICES, INC.
Address: PO BOX 585
City, State, Zip: KILGORE NM 87017

Sampling Location:

I. Lewis G-32 MKL-5

Sampler:

SHADAMS

SAMPLE IDENTIFICATION

SAMPLE IDENTIFICATION	SAMPLE		MATRIX	PRES.	Number of Containers	ANALYSIS REQUESTED			LAB ID
	DATE	TIME				ASPS	EPA 4161	EPA 3191	
<u>MKL-5-Joe MKL#5</u>	<u>9/26/96</u>	<u>2:02</u>	<u>Soil</u>	<u>20</u>	<u>1</u>	<u>X</u>	<u>X</u>	<u>X</u>	
<u>FED-600 F. Lewis # G-32</u>	<u>9/26/96</u>	<u>3:30</u>	<u>Soil</u>	<u>20</u>	<u>1</u>	<u>X</u>	<u>X</u>	<u>X</u>	

REPORT RESULTS TO

Name: _____ Title: _____
Company: _____
Mailing Address: _____
City, State, Zip: _____
Telephone No.: _____ Telefax No.: _____

ANALYSIS REQUESTED

Relinquished by: Stanley Adams Date/Time: 9/27/96 Received by: _____ Date/Time: _____

Relinquished by: _____ Date/Time: _____ Received by: _____ Date/Time: _____

Method of Shipment: _____ Date: 9/27 Rush: _____ 24-48 Hours: _____ 10 Working Days: _____ Special Instructions: _____

Authorized by: SAT (Client Signature Must Accompany Request) Date: 9/27

Polyaromatic Hydrocarbons EPA Method 8310

Contract Environmental Services, Inc.

Project ID:	Largo Wells	Report Date:	01/05/96
Sample ID:	408 - 411	Date Sampled:	12/05/95
Lab ID:	2067	Date Received:	12/05/95
Sample Matrix:	Water	Date Extracted:	12/11/95
Preservative:	Cool	Date Analyzed:	12/21/95
Condition:	Intact		

Target Analyte	Concentration (µg/L)
Acenaphthene	< 2.13
Acenaphthylene	< 3.74
Anthracene	< 1.49
Benzo(a)anthracene	< 0.88
Benzo(a)pyrene	< 0.39
Benzo(b)fluoranthene	< 0.19
Benzo(k)fluoranthene	< 0.34
Benzo(ghi)perylene	< 1.23
Chrysene	< 0.88
Dibenzo(a,h)anthracene	< 0.72
Fluoranthene	< 0.15
Fluorene	< 1.29
Indeno(1,2,3-cd)pyrene	< 1.05
Naphthalene	< 5.82
Phenanthrene	< 1.22
Pyrene	< 0.13

Reference: EPA Method 8310: Polynuclear Aromatic Hydrocarbons .



Review

Contract Environmental Services, Inc.
Post Office Box 505
Kirtland, New Mexico 87417-0505
Phone (505) 325-1198

RECEIVED
DIVISION
JAN 21 1996 8 52

January 21, 1996

Louis Dreyfus Natural Gas Co.
Mr. Gene Simer
Post Office Box 370
Carlsbad, New Mexico 88221

RE: MKL-5 (Sec 06, T26N, R07W) Monitor Well

Dear Mr. Simer,

Contract Environmental Services, Inc. (CES) is pleased to present this letter report on the installation of a monitoring well for the MKL-5 well location. This report includes background information, scope of services, field test data, laboratory data, conclusions and recommendations.

Background Information

On October 4, 1995 CES began excavating contaminated soil from the separator pit on the above referenced well location. The excavation was recently completed with an approximate 150 cubic yards of contaminated soil removed. The soil removed was evenly distributed on the surface where it could be soil farmed until remediated. On October 19, 1995 CES issued a technical report presenting the findings of this investigation. On December 4, 1995 CES installed one monitor well in the anticipated downgradient direction from the excavation. The following day the monitor well was developed and sampled.

Scope Of Services

CES with the help of Phillip Environmental installed the monitor well to a depth of approximately 37 feet. The monitor well is located 10' from the northwest corner of the excavation (Please see attached Figure 1). The bottom 15' of the 4" PVC pipe was slotted (Please see attached Figure 2) and the top 22' was completed with unscreened PVC pipe. The bottom of the monitor well has a 4" screw-on plug that prevents sediments from entering the bottom of the well. All of the joints were composed of screw-together threads. Silica sand was backfilled 2' above the slotted interval. Above the sand a 2' bentonite plug was placed. The remainder of the open hole was grouted to within 2' of groundlevel. From this point to the surface, the PVC pipe was cemented in place. A riser was left on the monitoring well approximately 3' above ground level. T-posts and fluorescent flagging was placed on all sides of the monitor well to protect it before leaving.

The monitor well was developed until the muddy water cleared up prior to sampling. An estimated five volumes of water were removed before collection for laboratory analyses. Water samples were gathered to be analyzed for Benzene, Toluene, Ethylbenzene, Xylenes (BTEX); Metals; Cations / Anions; and Polyaromatic Hydrocarbons (PAH). All water was analyzed using EPA Test Methods.

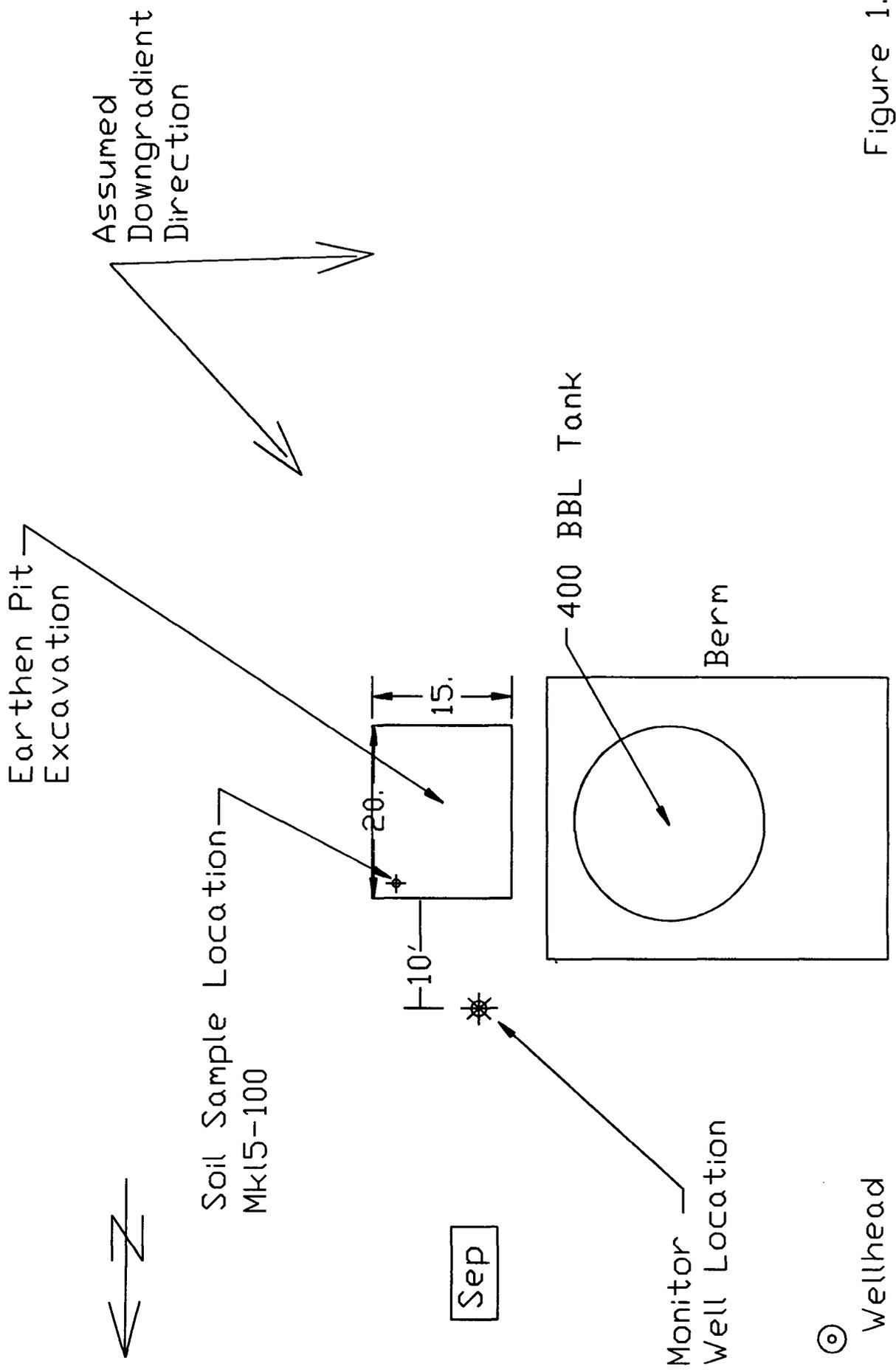
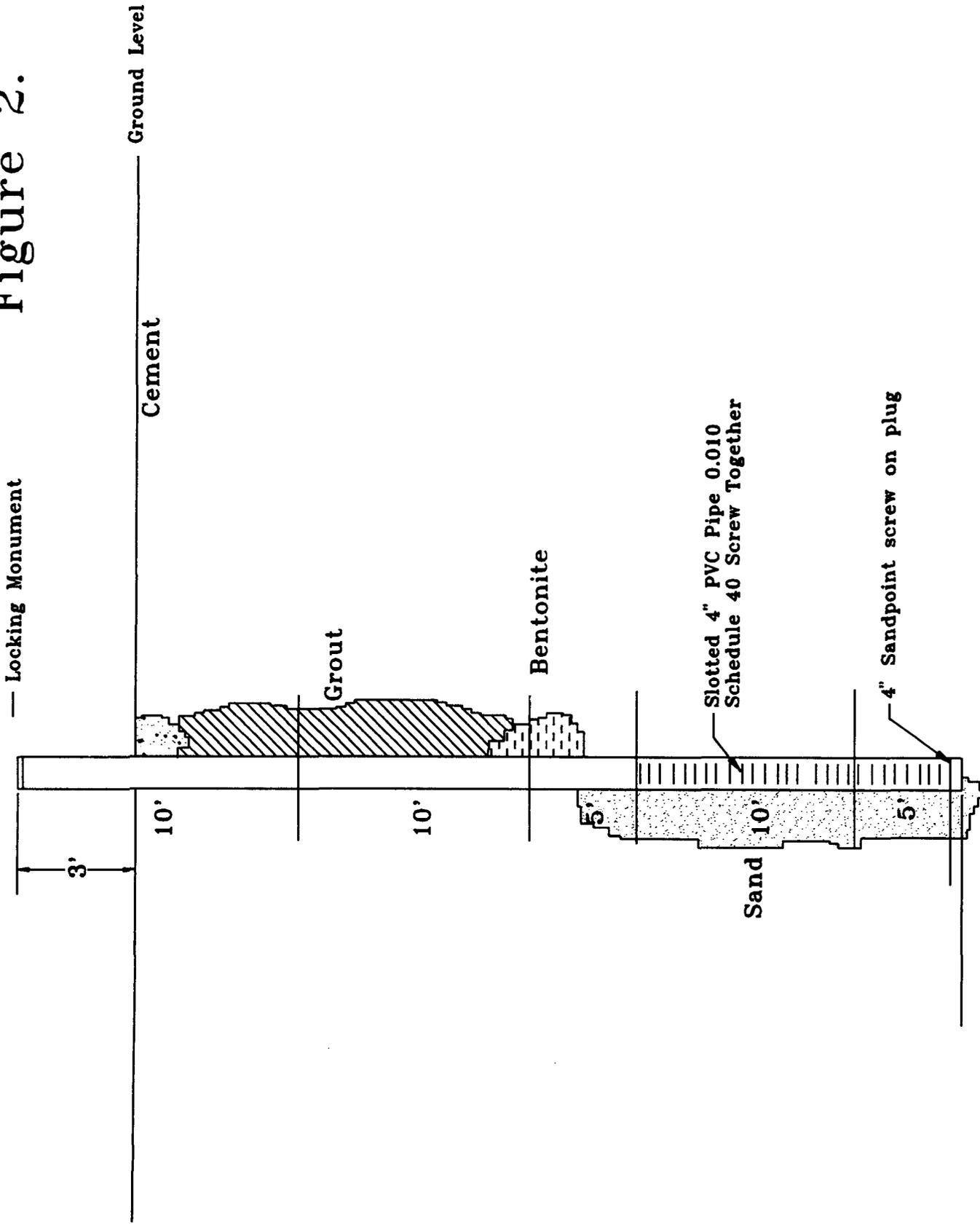


Figure 1.

Figure 2.



During the drilling operations, soil samples were gathered approximately every 5' of depth. Samples were collected from split- spoon samplers driven 24" into the soil. The soil was placed in baggies and tested with the PID Meter for hydrocarbons. The depth to water from the top of the casing riser measured 18'-9 5/8". Considering the height of the riser, that makes the first measured depth to groundwater approximately 15'-9".

Field Test Data

Field data collected during the drilling process included soil samples tested with a Photo-Ionization Detector (PID) Meter. The field data gathered is presented in the following Table.

Table 1-1.

Sample No.	Depth	PID(PPM)
1	3.5-5.5'	2.1
2	8.5-10.5'	7.9

Laboratory Data

The laboratory data gathered is summarized in the following Table. Individual laboratory reports are attached for your viewing.

Table 1-2.

Sample No.	Description	(Units)	
MKL5-408	BTEX EPA Method 602.2	B	ND PPB
		T	0.99 PPB
		E	0.54 PPB
		X	3.19 PPB
MKL5-409	Metals EPA Method 600/4	Arsenic	<0.005 PPM
		Barium	<0.25 PPM
		Cadmium	<0.002 PPM
		Chromium	<0.02 PPM
		Lead	<0.005 PPM
		Mercury	<0.001 PPM
		Selenium	<0.005 PPM
		Silver	<0.01 PPM
MKL5-411	Cation / Anion EPA Method 8310	Total Hardness	202 PPM
		Calcium	60.7 PPM
		Magnesium	12.3 PPM
		Potassium	6.0 PPM
		Sodium	550 PPM
		Iron	0.06 PPM
		Total Alkalinity	397 PPM
		Bicarbonate	397 PPM
		Chloride	20.0 PPM
		Sulfate	981 PPM

Cation / Anion Difference = 1.44

MKL5-410	Polynuclear Aromatic Hydrocarbons	Acenaphthene	<2.13	PPB
		Acenaphthylene	<3.74	PPB
		Anthracene	<1.49	PPB
		Benzo(a)anthracene	<0.88	PPB
		Benzo(a)pyrene	<0.39	PPB
		Benzo(b)fluoranthene	<0.19	PPB
		Benzo(k)Fluoranthene	<0.34	PPB
		Benzo(ghi)perylene	<1.23	PPB
		Chrysene	<0.88	PPB
		Dibenzo(a,h)anthracene	<0.72	PPB
		Fluoranthene	<0.15	PPB
		Fluorene	<1.29	PPB
		Indeno(1,2,3-cd)pyrene	<1.05	PPB
		Naphthalene	<5.82	PPB
		Phenanthrene	<1.22	PPB
		Pyrene	<0.13	PPB

Conclusions

Water data for BTEX was below New Mexico Drinking Water Standards as outlined in NMED Drinking Water Regulations (Title 20, Chapter 7, Part 1). Large numbers were found in the following concentrations, Sodium, Alkalinity, Sulfate. These values are to be considered normal for water found in a wash bottom such as this.

Recommendations

As confirmed with NMOCD, CES recommends that a second interval of BTEX water analyses should be collected from the monitor well within 60 days. If the BTEX concentration is below groundwater standards as found in this first interval, the monitoring well should be grouted to the surface and abandoned. "No Further Action" would be applied for to NMOCD for groundwater remediation. The contaminated soil in the soil farm should be regularly tilled as the weather warms until it has been reduced to less than 100 PPM from a laboratory TPH analysis. The excavation could then be backfilled and a "Closure Package" prepared for distribution to NMOCD.

Contract Environmental Services, Inc. appreciates this opportunity to present this letter report on the MKL-5 to Louis Dreyfus Natural Gas. If you have questions or require additional information, please don't hesitate to contact our offices at (505) 325-1198 or stop by at 4200 Hawkins Road, Farmington.

Sincerely,



Shawn A. Adams
Contract Environmental Services, Inc.

PURGEABLE AROMATICS

Contract Environmental Services, Inc.

Project ID: Largo Wells
Sample ID: 408 - 411
Lab ID: 2067
Sample Matrix: Water
Preservative: Cool
Condition: Intact

Report Date: 12/09/95
Date Sampled: 12/05/95
Date Received: 12/05/95
Date Analyzed: 12/08/95

Target Analyte	Concentration (ug/L)	Detection Limit (ug/L)
Benzene	ND	0.50
Toluene	0.99	0.50
Ethylbenzene	0.54	0.50
m,p-Xylenes	2.66	1.00
o-Xylene	0.53	0.50

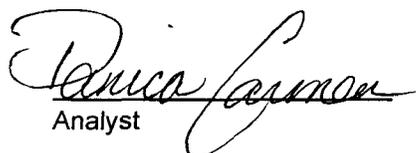
Total BTEX	4.71
-------------------	-------------

ND - Analyte not detected at the stated detection limit.

<u>Quality Control:</u>	<u>Surrogate</u>	<u>Percent Recovery</u>	<u>Acceptance Limits</u>
	Trifluorotoluene	101	88 - 110%
	Bromofluorobenzene	87	86 - 115%

Reference: Method 602.2, Purgeable Aromatics; Federal Register, Vol. 49, No. 209, Oct. 1984.

Comments:


Analyst


Review

Total Metals Analysis Contract Environmental Services, Inc.

Project ID:	Largo Wells	Date Reported:	01/09/96
Sample ID:	408 - 411	Date Sampled:	12/05/95
Laboratory ID:	2067	Time Sampled:	NA
Sample Matrix:	Water	Date Received:	12/05/95

Parameter	Analytical Result (mg/L)	Units
-----------	-----------------------------	-------

Trace Metals

Arsenic.....	< 0.005	mg/L
Barium.....	< 0.25	mg/L
Cadmium.....	< 0.002	mg/L
Chromium.....	< 0.02	mg/L
Lead.....	< 0.005	mg/L
Mercury.....	< 0.001	mg/L
Selenium.....	< 0.005	mg/L
Silver.....	< 0.01	mg/L

Reference: U.S.E.P.A. 600/4-79-020, Methods for Chemical Analysis of Water and Wastes, 1983.
Standard Methods For The Examination Of Water And Wastewater, 18th ed., 1992.

Comments:



Review

API Suite Contract Environmental Services, Inc.

Project ID: Largo Wells	Date Reported: 01/09/96
Sample ID: 408 - 411	Date Sampled: 12/05/95
Laboratory ID: 2067	Time Sampled: NA
Sample Matrix: Water	Date Received: 12/05/95

Parameter	Analytical Result	Units
General		
Lab pH.....	7.9	s.u.
Lab Conductivity @ 25° C.....	2,580	µmhos/cm
Total Dissolved Solids @ 180°C.....	1,870	mg/L
Total Dissolved Solids (Calc).....	1,870	mg/L
Specific Gravity.....	1.010	***
Anions		
Total Alkalinity as CaCO ₃	397	mg/L
Bicarbonate Alkalinity as CaCO ₃	397	mg/L
Carbonate Alkalinity as CaCO ₃	NA	mg/L
Hydroxide Alkalinity as CaCO ₃	NA	mg/L
Chloride.....	20.0	mg/L
Sulfate.....	981	mg/L
Nitrate + Nitrite - N.....	NA	
Nitrate - N.....	NA	
Nitrite - N.....	NA	
Cations		
Total Hardness as CaCO ₃	202	mg/L
Calcium.....	60.7	mg/L
Magnesium.....	12.3	mg/L
Potassium.....	6.0	mg/L
Sodium.....	550	mg/L
Iron.....	0.06	mg/L
Data Validation		<u>Acceptance Level</u>
Cation/Anion Difference.....	1.44	+/- 5 %
TDS (180):TDS (calculated).....	1.0	1.0 - 1.2

Reference U.S.E.P.A. 600/4-79-020, Methods for Chemical Analysis of Water and Wastes, 1983.
Standard Methods For The Examination Of Water And Wastewater, 18th ed., 1992.


 Review

Polyaromatic Hydrocarbons EPA Method 8310

Contract Environmental Services, Inc.

Project ID:	Largo Wells	Report Date:	01/05/96
Sample ID:	408 - 411	Date Sampled:	12/05/95
Lab ID:	2067	Date Received:	12/05/95
Sample Matrix:	Water	Date Extracted:	12/11/95
Preservative:	Cool	Date Analyzed:	12/21/95
Condition:	Intact		

Target Analyte	Concentration (µg/L)
Acenaphthene	< 2.13
Acenaphthylene	< 3.74
Anthracene	< 1.49
Benzo(a)anthracene	< 0.88
Benzo(a)pyrene	< 0.39
Benzo(b)fluoranthene	< 0.19
Benzo(k)fluoranthene	< 0.34
Benzo(ghi)perylene	< 1.23
Chrysene	< 0.88
Dibenzo(a,h)anthracene	< 0.72
Fluoranthene	< 0.15
Fluorene	< 1.29
Indeno(1,2,3-cd)pyrene	< 1.05
Naphthalene	< 5.82
Phenanthrene	< 1.22
Pyrene	< 0.13

Reference: EPA Method 8310: Polynuclear Aromatic Hydrocarbons .



Review

ANALYTICA

ENVIRONMENTAL LABORATORY

807 S. CARLTON • FARMINGTON, NM 87401 • (505) 326-2395

PROJECT MANAGER:
Analytica Lab I.D.:

Company:
Address:

Phone:

Fax:

Bill To:

Company:

Address:

Partner EDV, Serv.
PO Box 505
Kirtland, NM
325-1198

Louis Devers Lab
PO Box
Farmington, NM 87401

Sample ID	Date	Time	Matrix	Lab ID
400-4003	12-5-98		water	
400-407	11		11	
400-411	11		11	

Project Information	Sample Receipt	ORGANIC ANALYSES										WATER ANALYSES				METALS		COMMENTS
		Signature	Date															
Project #: 14-50 Wells	No. Containers: Custody Seals: Y / N / NA	Signature: [Signature]	Date: 12-5-98															
P.O. No.:	Received In tact:	Signature: [Signature]	Date: 12-5-98															
Shipped Via:	Received Cold:	Signature: [Signature]	Date: 12-5-98															
Required Turnaround Time (Prior Authorization Required for Rush)		Signature: [Signature]	Date: 12-5-98															

Please Fill Out Thoroughly.

Shaded areas for lab use only.

White/Yellow: Analytica
Pink: Client

CHAIN OF CUSTODY

Contract Environmental Services, Inc.

**Post Office Box 505
Kirtland, New Mexico 87417-0505
Phone (505) 325-1198**

NEW MEXICO OIL CONSERVATION DIVISION
FEB 19 1995

October 19, 1995

10 19 1995 8 52

New Mexico Oil Conservation Division
Mr. Bill Olson
2400 Pacheco Street
Santa Fe, New Mexico 85730

RE: Louis Dreyfus Natural Gas Corporation, MKL #5, Sec 6, T26N, R07W NW/NE, Rio Arriba
County, New Mexico

Dear Mr. Olson,

Contract Environmental Services, Inc. (CES) is pleased to present this "Plan of Action" for the MKL #5 well location on behalf of Louis Dreyfus Natural Gas Corporation (LDNG). This plan contains background information, current site assessment data, a site plan, conclusions and a "Plan of Action".

Background Information

On October 4, 1995 CES began excavating the soil immediately below the earthen pit. As soils were removed from the excavation, periodic samples were gathered to be analyzed using a Photo-Ionization Detector (PID) meter. Soils removed were transferred to another portion of the wellpad to establish a soil farm for continued remediation. These soils were spread on the wellpad some 6" to 12" in depth to allow for aeration and the release of volatile aromatic hydrocarbons.

Approximately 70 cubic yards of contaminated soil was removed from the excavation during the excavation process. At a depth of 17' a field PID soil sample indicated that the contaminated soil had not been removed. A confirmation laboratory soil sample was gathered to be processed for Total Petroleum Hydrocarbons (TPH) using EPA Method 418.1. This laboratory soil analysis confirmed that uncontaminated soil had not been reached. The remainder of the pit area was "Cleaned Out" to this same depth. It is anticipated that not all contamination was removed from the bottom and walls of the excavation.

On the west side of the excavation there is a berm and fence line surrounding a storage tank that prevents removing all contaminated material. Leaving the excavation open for an extended period of time will enable the contaminated soil in the wall to remediate as well.

The following is field PID data collected during the removal process.

Center Of Earthen Pit

PID Field Data Collected

<u>Depth</u>	<u>Sample No.</u>	<u>PID(PPM)</u>	<u>Location</u>
4'	#1	2000+	Center of Pit
7'	#2	2000+	Center of Pit
17'	#3	2000+	Center of Pit

Laboratory Data Collected

<u>Depth</u>	<u>Sample No.</u>	<u>PID(PPM)</u>	<u>Location</u>
17'	MKL5-100	2970	Center of Pit

Conclusions

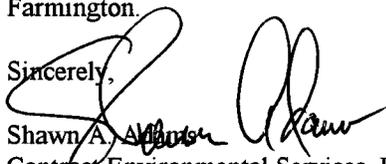
Soil contamination in the excavation continued beyond the digging ability of the equipment. Remaining wall contamination will remediate while the excavation remains open during the soil remediation process. CES believes that LDNG has not adequately removed the contaminated soil or sufficiently defined the vertical extent of contamination. CES ranks this site at 100 PPM cleanup score with a maximum benzene level of 10 PPM. The amount of impact to the groundwater is unknown at this point.

Plan of Action

Continue removing the contaminated soils from the excavation, move in a lateral direction testing the excavation walls as the digging proceeds. Remove the contamination in the excavation walls until the PID Meter indicates below 100 PPM. Remediate the soils contained in the soil farm to below 100 PPM laboratory TPH by EPA Method 418.1 or 8015 Modified for gas and diesel. Auger in a monitor well approximately 5' into the groundwater in a downgradient direction from the excavation. A water sample will be collected from this monitor well after the standard 3 volumes of water have been extracted. The water sample will be analyzed for Benzene, Toluene, Ethylbenzene and Xylenes (BTEX) using EPA Method 8020. Return the remediated soils to the pit area as backfill and slightly dome the area to prevent water ponding. In addition, the soils will be checked for contamination approximately every 4' during the drilling process while installing the monitor well. A report on the finding will be presented to NMOCD for their records.

Contract Environmental Services, Inc. appreciates this opportunity to present this "Plan of Action" on behalf of Louis Dreyfus Natural Gas Corporation. If you have questions or require additional information, please don't hesitate to contact our offices at (505) 325-1198 or stop by at 4200 Hawkins Road, Farmington.

Sincerely,


Shawn A. Alford

Contract Environmental Services, Inc.

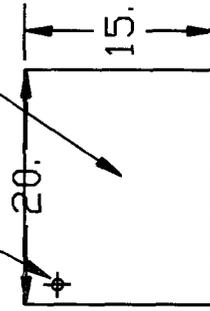
cc: Mr. Denny Foust, NMOCD Farmington
Mr. Bill Liese, BLM Farmington

Earthen Pit
Excavation

Assumed
Downgradient
Direction

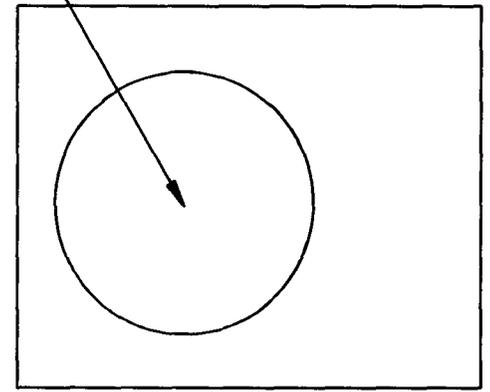


Soil Sample Location
Mk15-100



Sep

400 BBL Tank



Proposed Monitor
Well Location



Wellhead