

***BLAGG ENGINEERING, INC.***

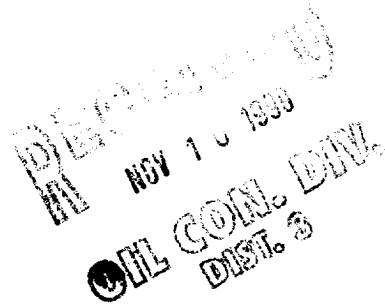
P.O. Box 87, Bloomfield, New Mexico 87413

Phone: (505)632-1199 Fax: (505)632-3903

November 12, 1999

Mr. Denny Foust  
NM Oil Conservation Division  
1000 Rio Brazos Rd.  
Aztec, NM 87410

Re: Request for Closure of Spill Reclamation  
Dugan Production Corporation - Enniskillen No. 1  
(G) Sec. 9 - T23N - R6W  
Rio Arriba County, New Mexico



Dear Mr. Foust:

On behalf of Dugan Production Corporation, Blagg Engineering, Inc. (BEI) is requesting closure of a spill reclamation at the Enniskillen No. 1, (G) Sec. 9 - T23N - R6W, Rio Arriba County, New Mexico. A spill of approximately 100 barrels of hydrocarbons to the environment was discovered within a sub-grade fiberglass tank pit at the location. Between November 2 - 4, 1999 BEI directed excavations of hydrocarbon impacted soils at the spill. Contaminated media has been landfarmed on location.

A total of approximately 427 cubic yards of soil was excavated from the tank spill and placed into the landfarm. Due to the location of a gas sales line and processing equipment it was not feasible to remove all contaminated soils from the spill site. The vertical extent of impacts at the tank pit was established at 12 feet below grade based on field and laboratory test results.

An abandoned separator pit is located adjacent to the tank pit site. During reclamation of the spill, impacted soils in excess of closure standards were discovered to be associated with the abandoned separator pit. It is proposed to address remediation of these impacts when the well is plugged and abandoned.

A final request for closure of the spill reclamation will be submitted to the NMOCD following completion of landfarm activities. The landfarm will be tilled periodically until closure standards are achieved.

Questions or comments concerning this request for closure may be directed to Jeff Blagg at (505)632-1199.

Respectfully submitted:

***Blagg Engineering, Inc.***

Jeffrey C. Blagg, P.E.  
President

cc: Mr. William Olson - NMOCD Santa Fe  
Mr. Bill Liess - BLM Farmington  
Mr. Tom Blair - Dugan Production Corp.

Attachments: Field Closure Report and Laboratory Test Reports

|  |  |  |
|--|--|--|
| CLIENT: <u>DUGAN</u><br>PRODUCTION<br>CORP | BLAGG ENGINEERING, INC.<br>P.O. BOX 87, BLOOMFIELD, NM 87413<br>(505) 632-1199 | LOCATION NO: _____<br>C.O.C. NO: <u>7551</u> |
|--|--|--|

|   |  |   |
|---|--|---|
| FIELD REPORT: CLOSURE VERIFICATION      |  | PAGE No: <u>1</u> of <u>1</u>                                 |
| LOCATION: NAME: <u>ENNISKILLEN</u>      | WELL #: <u>1</u>   | PIT: ( <u>SEPARATOR</u> <u>SPILL SITE</u> )                   |
| QUAD/UNIT: <u>G</u> SEC: <u>9</u>       | TWP: <u>23N</u> RNG: <u>6W</u> PM: <u>NM</u> CNTY: <u>RA</u> ST: <u>NM</u> | DATE STARTED: <u>11-2-99</u><br>DATE FINISHED: <u>11-4-99</u> |
| GTR/FOOTAGE: <u>1650 FNL x 1650 FEL</u> | CONTRACTOR: <u>BLAGG/3D</u>  | ENVIRONMENTAL SPECIALIST: <u>JLB</u>                          |

|  |   |
|--|---|
| EXCAVATION APPROX. <u>30</u> FT. x <u>32</u> FT. x <u>12</u> FT. DEEP. | CUBIC YARDAGE: <u>427</u>               |
| DISPOSAL FACILITY: <u>ON SITE</u>                                      | REMEDIATION METHOD: <u>LANDFARM</u>     |
| LAND USE: <u>BLM</u>   | LEASE: <u>NM 28736</u> FORMATION: _____ |

|                                     |  |
|-------------------------------------|--|
| FIELD NOTES & REMARKS:              | PIT LOCATED APPROXIMATELY <u>50</u> FT. <u>S75E</u> FROM WELLHEAD.   |
| DEPTH TO GROUNDWATER: <u>&lt;50</u> | NEAREST WATER SOURCE: <u>975'</u> NEAREST SURFACE WATER: <u>975'</u> |
| NMOC RANKING SCORE: <u>20</u>       | NMOC TPH CLOSURE STD: <u>100</u> PPM                                 |
| SOIL AND EXCAVATION DESCRIPTION:    |  |

|  |
|--|
| <input checked="" type="checkbox"/> CHECK ONE      |
| <input type="checkbox"/> PIT ABANDONED             |
| <input type="checkbox"/> STEEL TANK INSTALLED      |
| <input type="checkbox"/> FIBERGLASS TANK INSTALLED |

SILT, SAND + CLAY LENSES. DRY, FIRM, COHESIVE.

Hydrocarbon STAIN + ODOR IN ORIGINAL SPILL PIT. MINOR RESIDUAL STAINING ON SIDEWALLS FOLLOWING EXCAVATION.

ORIGINAL PIT APPROXIMATELY 12' x 12' x 7' DEEP.

FINAL EXCAVATION APPROXIMATELY 30' x 32' x 12' DEEP. PIPELINE TO WEST OF PIT RESTRICTING EXCAVATION.

#### FIELD 418.1 CALCULATIONS

| TIME | SAMPLE I.D. | LAB No. | WEIGHT (g) | mL. FREON | DILUTION | READING | CALC. ppm |
|------|-------------|---------|------------|-----------|----------|---------|-----------|
|      |             |         |            |           |          |         |           |
|      |             |         |            |           |          |         |           |
|      |             |         |            |           |          |         |           |

SCALE

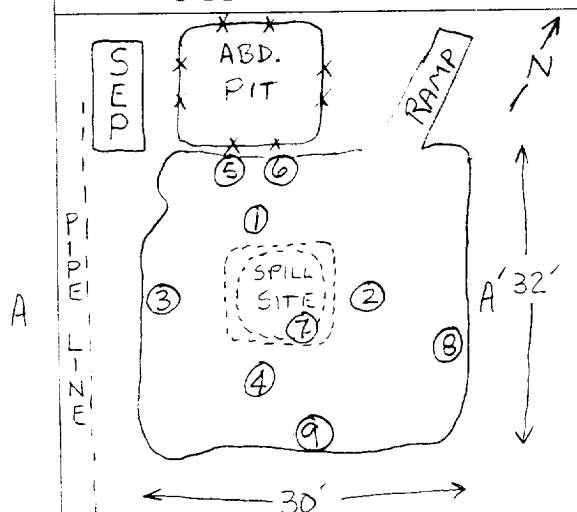


0 FT

#### PIT PERIMETER

#### OVM RESULTS

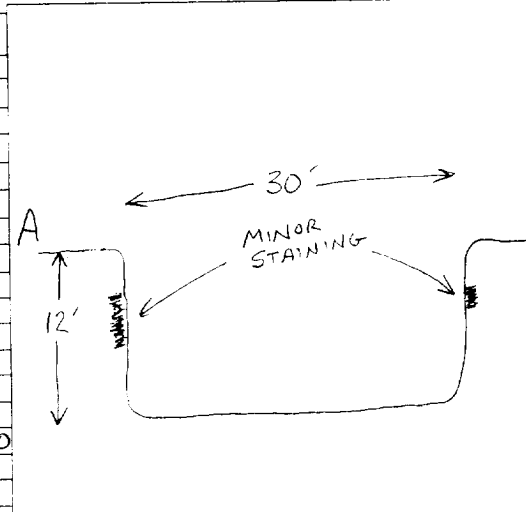
#### PIT PROFILE



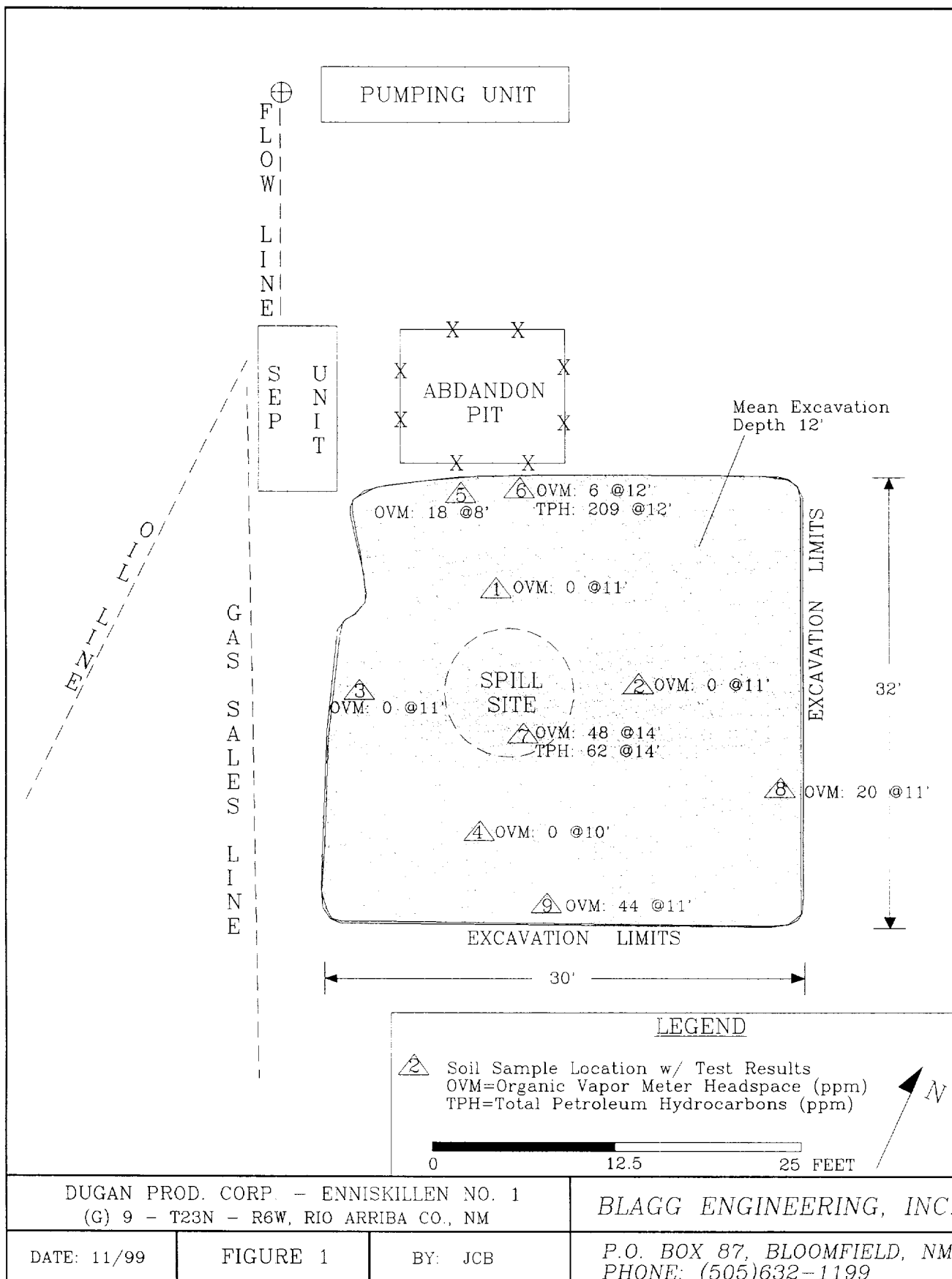
| SAMPLE ID | FIELD HEADSPACE PID (ppm) |
|-----------|---------------------------|
| 1 @ 11'   | ND                        |
| 2 @ 11'   | ND                        |
| 3 @ 11'   | ND                        |
| 4 @ 11'   | ND                        |
| 5 @ 8'    | 13.5                      |
| 6 @ 12'   | 6.4                       |
| 7 @ 14'   | 48.4                      |
| 8 @ 11'   | 20.6                      |
| 9 @ 11'   | 44.2                      |

| SAMPLE ID | ANALYSIS | TIME |
|-----------|----------|------|
| 6 @ 12'   | 8015     | 1140 |
| 7 @ 14'   | 8015     | 0950 |



|               |                |               |
|---------------|----------------|---------------|
| TRAVEL NOTES: | CALLOUT: _____ | ONSITE: _____ |
|---------------|----------------|---------------|



DUGAN PROD. CORP. - ENNISKILLEN NO. 1  
(G) 9 - T23N - R6W, RIO ARRIBA CO., NM

BLAGG ENGINEERING, INC.

DATE: 11/99

FIGURE 1

BY: JCB

P.O. BOX 87, BLOOMFIELD, NM  
PHONE: (505)632-1199

# ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

## EPA METHOD 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons


|                      |                  |                     |          |
|----------------------|------------------|---------------------|----------|
| Client:              | Blagg / Dugan    | Project #:          | 403410   |
| Sample ID:           | Tank Pit N @ 12' | Date Reported:      | 11-07-99 |
| Laboratory Number:   | G370             | Date Sampled:       | 11-03-99 |
| Chain of Custody No: | 7551             | Date Received:      | 11-04-99 |
| Sample Matrix:       | Soil             | Date Extracted:     | 11-05-99 |
| Preservative:        | Cool             | Date Analyzed:      | 11-05-99 |
| Condition:           | Cool and Intact  | Analysis Requested: | 8015 TPH |

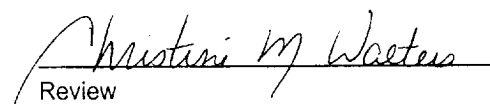
| Parameter                    | Concentration<br>(mg/Kg) | Det.<br>Limit<br>(mg/Kg) |
|------------------------------|--------------------------|--------------------------|
| Gasoline Range (C5 - C10)    | 59.6                     | 0.2                      |
| Diesel Range (C10 - C28)     | 149                      | 0.1                      |
| Total Petroleum Hydrocarbons | 209                      | 0.2                      |

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: **Enniskillen #1.**

  
Analyst

  
Review

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PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

## EPA METHOD 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

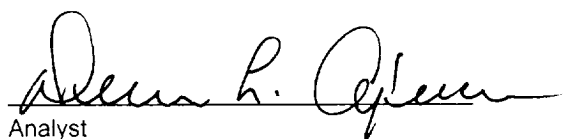
|                      |                  |                     |          |
|----------------------|------------------|---------------------|----------|
| Client:              | Blagg / Dugan    | Project #:          | 403410   |
| Sample ID:           | Tank Pit C @ 14' | Date Reported:      | 11-07-99 |
| Laboratory Number:   | G371             | Date Sampled:       | 11-04-99 |
| Chain of Custody No: | 7551             | Date Received:      | 11-04-99 |
| Sample Matrix:       | Soil             | Date Extracted:     | 11-05-99 |
| Preservative:        | Cool             | Date Analyzed:      | 11-05-99 |
| Condition:           | Cool and Intact  | Analysis Requested: | 8015 TPH |

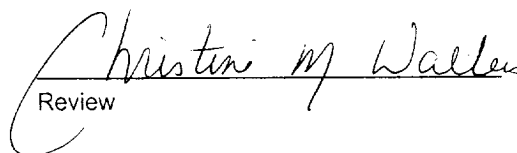
| Parameter                    | Concentration<br>(mg/Kg) | Det.<br>Limit<br>(mg/Kg) |
|------------------------------|--------------------------|--------------------------|
| Gasoline Range (C5 - C10)    | 0.9                      | 0.2                      |
| Diesel Range (C10 - C28)     | 61.8                     | 0.1                      |
| Total Petroleum Hydrocarbons | 62.7                     | 0.2                      |

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: Enniskillen #1.

  
Analyst

  
Review

7551

# ENVIROTECH INC.

5796 U.S. Highway 64  
Farmington, New Mexico 87401  
(505) 632-0615