

**SPILL
REPORT
&
CLOSURE**

EOTT ENERGY PIPELINE, LP

SITE INVESTIGATION, REMEDIATION, AND FINAL C-141 CLOSURE DOCUMENTATION

PEARL QUEEN 6" GATHERING
EOTT REF: "PEARL QUEEN"

UL-C NE¹/₄ OF THE NW¹/₄ OF SECTION 20 T20S R37E

~4 MILES SOUTH OF MONUMENT

LEA COUNTY, NEW MEXICO

LATITUDE: 32°33'51"N

LONGITUDE: 103°16'32"W

RECEIVED

MAY 29, 2002

JUN 17 2002

PREPARED BY:

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

Environmental Plus, Inc.

2100 Avenue O

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Executive Summary

Environmental Plus, Inc. (EPI) was notified by EOTT Energy Corporation (EOTT) on September 9, 2000 regarding the installation and sampling of a ground water monitoring well at EOTT's "Pearl Queen 6" Gathering" site. EOTT's Pearl Queen 6" Gathering site is located approximately 4 miles south of Monument, Lea County, New Mexico on property owned by the State of New Mexico. EPI was not involved with the site characterization, delineation or remediation of the spill site.

In reviewing EOTT's C-141 submittals and related correspondence by, and between EOTT Environmental Engineering staff and NMOCD, the following project chronology is ascertained:

1. 09-16-99 - The initial C-141 was submitted to NMOCD by Lenna Frost, EOTT Sr. Environmental Engineer. The initial C-141 indicates the spill occurred on 9-8-99. 15-barrels of crude oil were released and approximately 8 barrels were recovered. The affected surface area is described as a 300' X 2' row along the pipeline. It is further indicated that removal of contaminated soil was in progress on that date, and that J&L Land Farm was utilized for contaminated soil disposal.
2. 12-10-99 - A final C-141 was submitted by EOTT to NMOCD. This report indicates 7500 yd³ of contaminated soil was removed from the site and disposed of at J&L Land Farm. The excavation was backfilled with clean soil. Two bottom-hole water samples and two bottom-hole soil samples were taken on 12-6-99. Samples were submitted to Environmental Lab of Texas, Odessa - TX for analysis. The water samples were analyzed for BTEX and soil samples were analyzed for TPH. Analyses reports were submitted as attachments to the Final C-141. The two bottom-hole soil analyses indicated GRO and DRO levels of <10 ppm. BTEX analyses of the north and south bottom-hole water samples indicated total BTEX levels of 0.061 and 0.057 ppm respectively, however, the two samples indicated Benzene levels of .012 and .011 ppm respectively, which are both above the NMWQCC maximum allowable limit of .01 ppm (10 ppb).
3. 02-04-00 - NMOCD (William Olson) responded to EOTT's 12-10-99 C-141 submittal. Mr. Olson pointed out that OCD personnel had inspected the site and had noted that the ground water had been penetrated during the excavation process, and that the exposed ground water was visibly contaminated with petroleum product. He further stated that EOTT would need to determine the extent of ground water contamination at the site because of the Benzene levels in the ground water samples being above the NMWQCC allowable limit of 10 ppb.
4. 02-16-00 - EOTT submittal of water contamination work plan and corrected C-141. EOTT proposed that the >10 ppb Benzene contaminated ground water be allowed to attenuate naturally. EOTT's environmental engineer states that a clay barrier was placed between the water table and the backfill material, thus preventing further contamination from this spill. EOTT proposed the installation of a ground water monitoring well to be installed immediately down-gradient (south) of the excavation, with a 12-month sampling regimen to determine ground water contamination.
5. 05-24-00 - NMOCD (William Olson) conditionally accepted EOTT's work plan for determination of ground water contamination at the site. Conditions were specific to monitor well design, construction, development, and to reporting requirements.

EPI commenced installation of a down-gradient monitor well on September 20, 2000. The well was completed on the 20th, developed on the 21st, and initially sampled on the 22nd. Ground water depth was measured at 27-feet bgs at the time of well installation. In addition to the initial sampling on 9-22-00, the well was sampled subsequently on 1-24-01 and 6-13-01. Analyses for the 9-22-00 and 1-24-01 sampling events consisted of TPH, BTEX, Cations/Anions, and PAH. The 6-13-01 analyses consisted of only TPH and BTEX.

The analyses of the 9-22-00 and 1-24-01 water samples resulted in undetectable BTEX and PAH levels, ion levels normal for ground water in this area, and minimal TPH levels of 1.0 – 4.0 ppm. Since ion levels were normal and the PAH was undetectable for two successive samples, these protocols were dropped from the final 6-13-01 sampling. The 6-13-01 sampling indicated TPH and BTEX levels below detection limits.

The contamination of the ground water beneath this site caused by the inadvertent encroachment of the water table was minimal, and that sample analyses indicate that the initial contamination has attenuated sufficiently to allow for closure of the site.

1.0 Introduction

This report addresses the site investigation and remediation of the EOTT Energy Pipeline “Pearl Queen 6” Gathering” remediation site. Environmental Plus, Inc. (EPI), Eunice, New Mexico was not involved with site investigation and/or remedial activities at the site. EPI was contracted by EOTT to locate, install and sample an approved ground water monitoring well immediately down-gradient to the excavated and backfilled area of the site. The ground water monitoring well was installed on September 20, 2000. The monitor well was developed on September 21st, and the initial sampling event took place on September 22, 2000. Subsequent water sampling took place on January 24, 2001 and June 13, 2001.

2.0 Background

The site is associated with the EOTT Energy Pipeline – Pearl Queen 6” crude oil gathering pipeline. This site is located in Unit Letter C, in the NE¹/₄ of the NW¹/₄ of Section 20 T20S R37E, approximately 4 miles south of Monument, Lea County New Mexico at Latitude 32°33’51”N and Longitude 103°16’32”W. The property is owned by the State of New Mexico. A topographical map of the site and a detailed site map are included in Attachment I.

The crude oil release occurred on September 8, 1999 with an estimated 15 barrels released, and 8 barrels recovered. The leak was the result of pipe corrosion. The pipe was initially clamped and eventually replaced by EOTT.

3.0 Site Description

3.1 Geological Description

The United States Geological Survey (USGS) Ground-Water Report 6, “Geology and Ground-Water Conditions in Southern Lea County, New Mexico.” A. Nicholson and A. Clebsch, 1961, describes the near surface geology of southern Lea County as an intergrade of the Quaternary Alluvium (QA) sediments, i.e., fine to medium sand, with the mostly eroded Cenozoic Ogallala (CO) formation. Typically, the QA and CO formations in the area are capped by a thick interbed of caliche and generally overlain by sandy soil. The release site is located at the eastern extent of the Laguna Valley physiographic subdivision, described by Nicholson & Clebsch as an area “covered almost entirely by dune sand which is stable or semi-stable over most of the area, but which locally drifts. The surface is very irregular and has no drainage features except at the edges of several playas. The sand is generally underlain by recent alluvium but in several places the sand forms topographic highs where it is underlain by a caliche surface. The thickness of the sand cover ranges from a few inches to a probable maximum of 20-feet.

3.2 Ecological Description

The area is typical of the Upper Chihuahuan Desert Biome consisting primarily of hummocky sand hills covered with Harvard Shin Oak (*Quercus harvardi*) interspersed with Honey Mesquite (*Prosopis glandulosa*) along with typical desert grasses and weeds. Mammals represented, include

Orrd's and Merriam's Kangaroo Rat, Deer Mouse, White Throated Wood Rat, Cottontail Rabbit, Black Tailed Jackrabbit, and the Mule Deer. Reptiles, Amphibians, and Birds are numerous and typical of area. A survey of Listed, Threatened, or Endangered species was not conducted.

3.3 Area Ground Water

The unconfined ground water aquifer was measured at the time of the monitor well installation to be 27' bgs. This depth to GW is consistent with the information contained within "United States Geological Survey (USGS) Ground Water Report 6, 1961, A. Nicholson and A. Clebsch." The ground water flow gradient at this particular site is predicted to be essentially south, rather than the predominant southeasterly gradient present in southern Lea County. An enlarged portion of the Nicholson & Clebsch "Ground Water Map of Southern Lea County" with annotations indicating site location and ground water gradient is included in Attachment I.

3.4 Area Water Wells

All recorded wells are greater than 1000 horizontal feet from the site.

3.5 Area Surface Water Features

No surface water bodies exist within 1000 horizontal feet of the site.

4.0 NMOCD Site Ranking

Documentation provided by EOTT to EPI regarding remedial work done at this site prior to EPI's involvement with the project, and EPI's physical measurement of depth to water at the site, indicate that the chemical parameters of the soil and ground water were characterized consistent with the characterization and remediation/abatement goals and objectives set forth in the New Mexico Oil Conservation Division (NMOCD) approved "General Work Plan for Remediation of E.O.T.T. Pipeline Spills, Leaks and Releases in New Mexico, July 2000" and the NMOCD guidelines published in the following documents;

- ◆ Guidelines for Remediation of Leaks, Spills and Releases (August 13, 1993)
- ◆ Unlined Surface Impoundment Closure Guidelines (February 1993)

Acceptable thresholds for **contaminants/constituents of concern (CoCs)**, i.e., TPH^{8015m}, Benzene, and the mass sum of Benzene, Toluene, Ethyl Benzene, and total Xylene (BTEX), was determined based on the NMOCD Ranking Criteria as follows:

- ◆ Depth to Ground water, i.e., distance from the lower most acceptable concentration to the ground water.
- ◆ Wellhead Protection Area, i.e., distance from fresh water supply wells.
- ◆ Distance to Surface Water Body, i.e., horizontal distance to all down gradient surface water bodies.

Based on the proximity of the site to protectable area water wells, surface water bodies, and depth to ground water from the lower most contamination, the NMOCD ranking score for the site is 20 points with the soil remedial goals highlighted in the Site Ranking Matrix presented on the following page.

1. Ground Water	2. Wellhead Protection Area	3. Distance to Surface Water	
Depth to GW <50 feet: 20 points	if <1000' from water source, or, <200' from private domestic water source: 20 points	<200 horizontal feet: 20 points	
Depth to GW 50 to 99 feet: 10 points		200-1000 horizontal feet: 10 points	
Depth to GW >100 feet: 0 points	if >1000' from water source, or, >200' from private domestic water source: 0 points	>1000 horizontal feet: 0 points	
Ground Water Score=20	Wellhead Protection Area Score= 0	Surface Water Score= 0	
Site Rank (1+2+3) = 20 + 0 + 0 = 20 points (for soil 0-27'bgs)			
Total Site Ranking Score and Acceptable Remedial Goal Concentrations			
Parameter	20-60 (for soil 0 – 27' bgs)	10	0
Benzene ¹	10 ppm	10 ppm	10 ppm
BTEX ¹	50 ppm	50 ppm	50 ppm
TPH	100 ppm	1000 ppm	5000 ppm
¹ 100 ppm field VOC headspace measurement may be substituted for lab analysis			

5.0 Subsurface Soil Investigation

Subsurface soil analysis was accomplished with VOC analysis of bottom-hole samples utilizing Photo-Ionization Detection technology, and with submittal of bottom-hole soil samples for laboratory analysis for TPH.

Laboratory analytical reports and summary table of all analytical results are provided in Attachment II.

6.0 Ground Water Investigation

Ground water depth was measured to be 27-feet below ground surface level during the installation of an approved ground water monitoring well at the site on 9-20-00. Ground water analyses during the period 9-22-00 to 6-13-01 indicate that the initial ground water contamination that occurred during excavation of the site was minimal and that petroleum contamination beneath the site has attenuated to below detectable levels for all CoC's. There will be no need for further ground water investigation.

7.0 Remediation

Remediation of the site consisted of excavation of the affected area, placement of a 2-ft clay barrier over the shallow water table, and backfilling with clean soil. Approximately 7,500 yd³ of contaminated soil was excavated from the site and disposed of at J&L Land Farm.

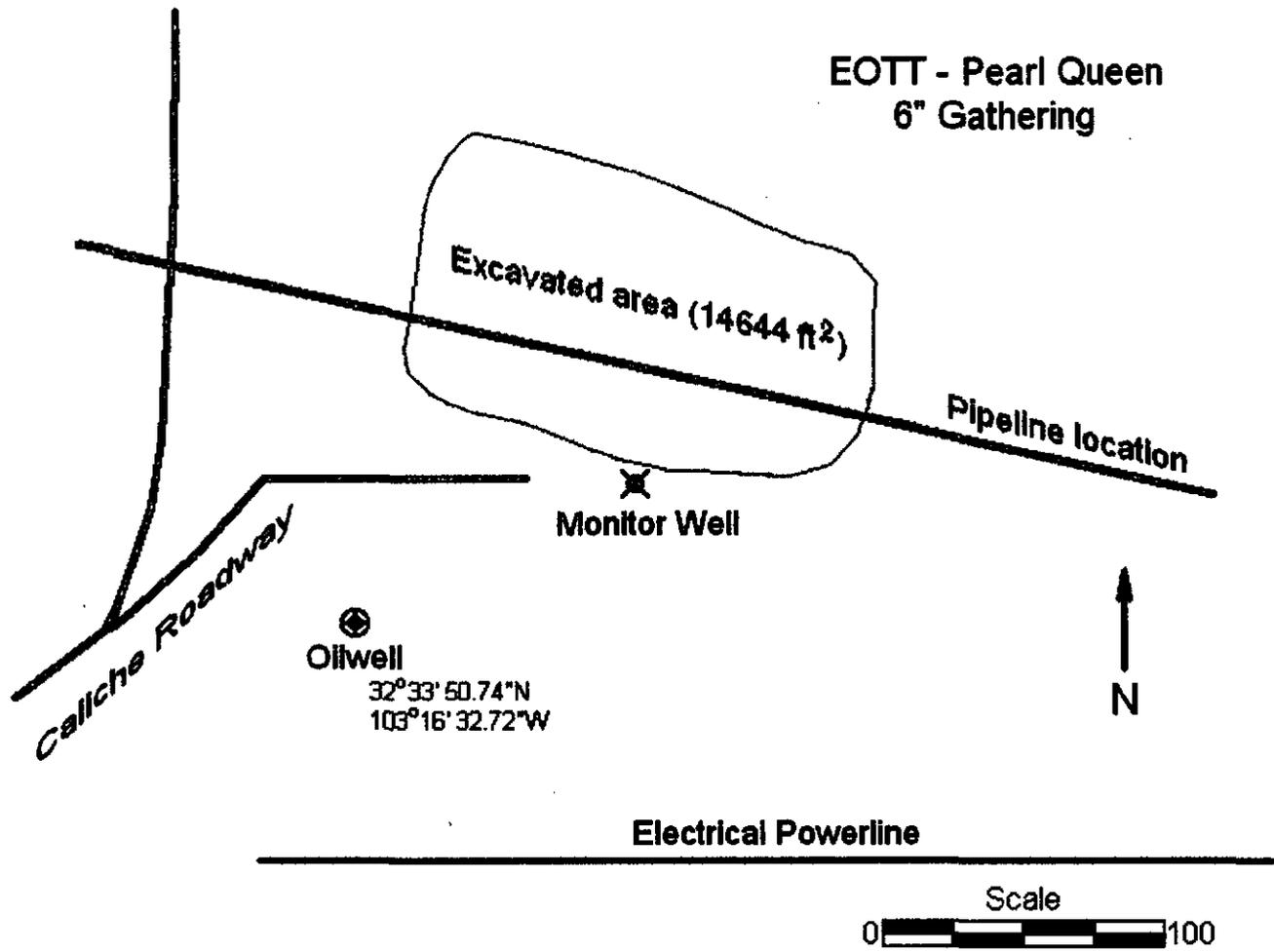
8.0 Closure Justification

This report documents successful implementation of the Remediation Plan approved by NMOCD and is consistent with the NMOCD approved "E.O.T.T. General Work Plan for Remediation of E.O.T.T. Pipeline Spills, Leaks and Releases in New Mexico, July – 2000". Soil contaminated above the prescribed CoC remedial concentrations was excavated and disposed of at an approved land farm. As per EOTT documentation (Lennah Frost, 02-16-00), a 2-ft clay barrier was placed over the water table to prevent

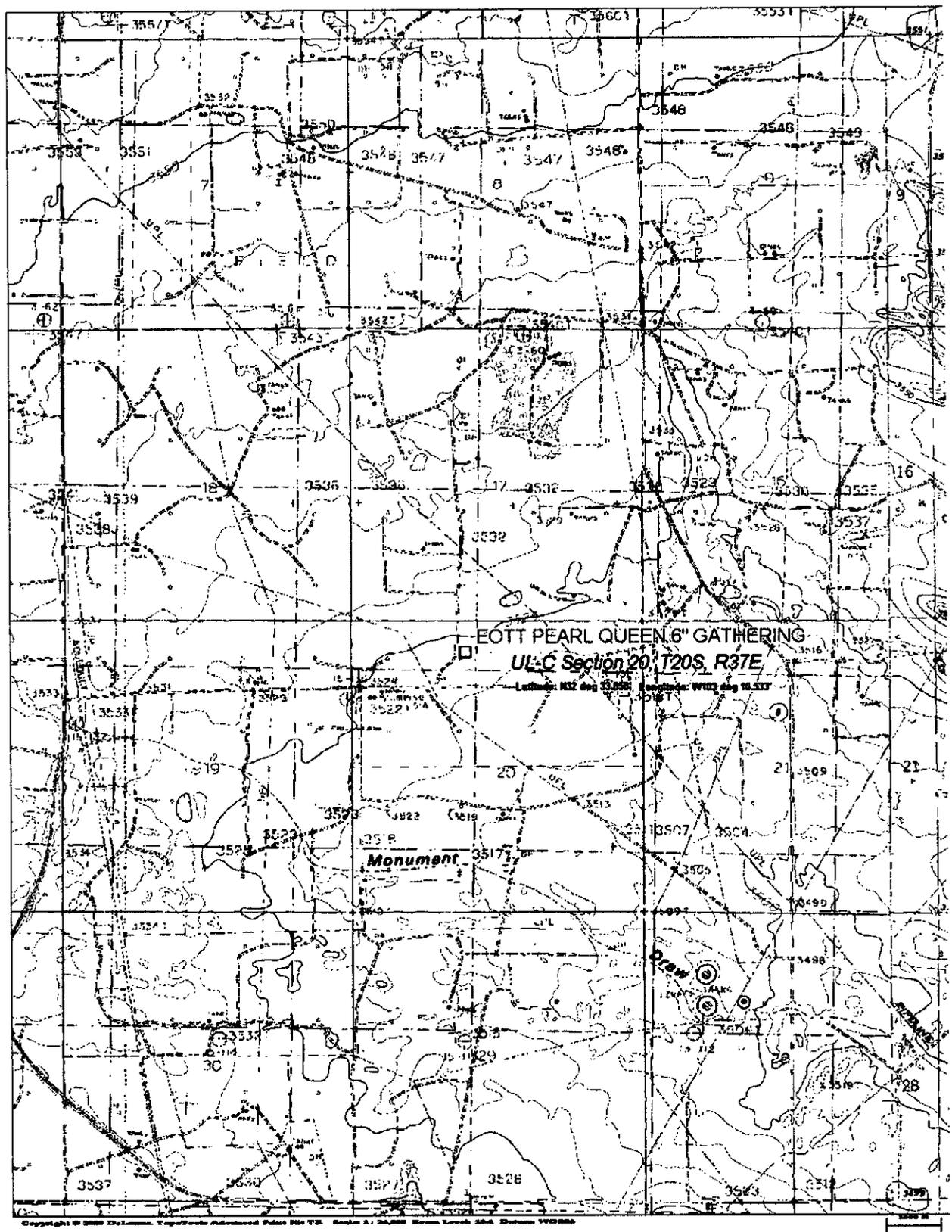
additional contamination of the ground water beneath the site, and the excavation was backfilled with clean soil. The subsequent ground water investigation conducted by EPI indicates that the ground water beneath the site is well within acceptable contamination levels. Based on the data presented in this report, Environmental Plus, Inc., on behalf of E.O.T.T. Energy Pipeline, requests that the NMOCD require "no further action" at this site.

Attachment I: Site and Topographic Maps

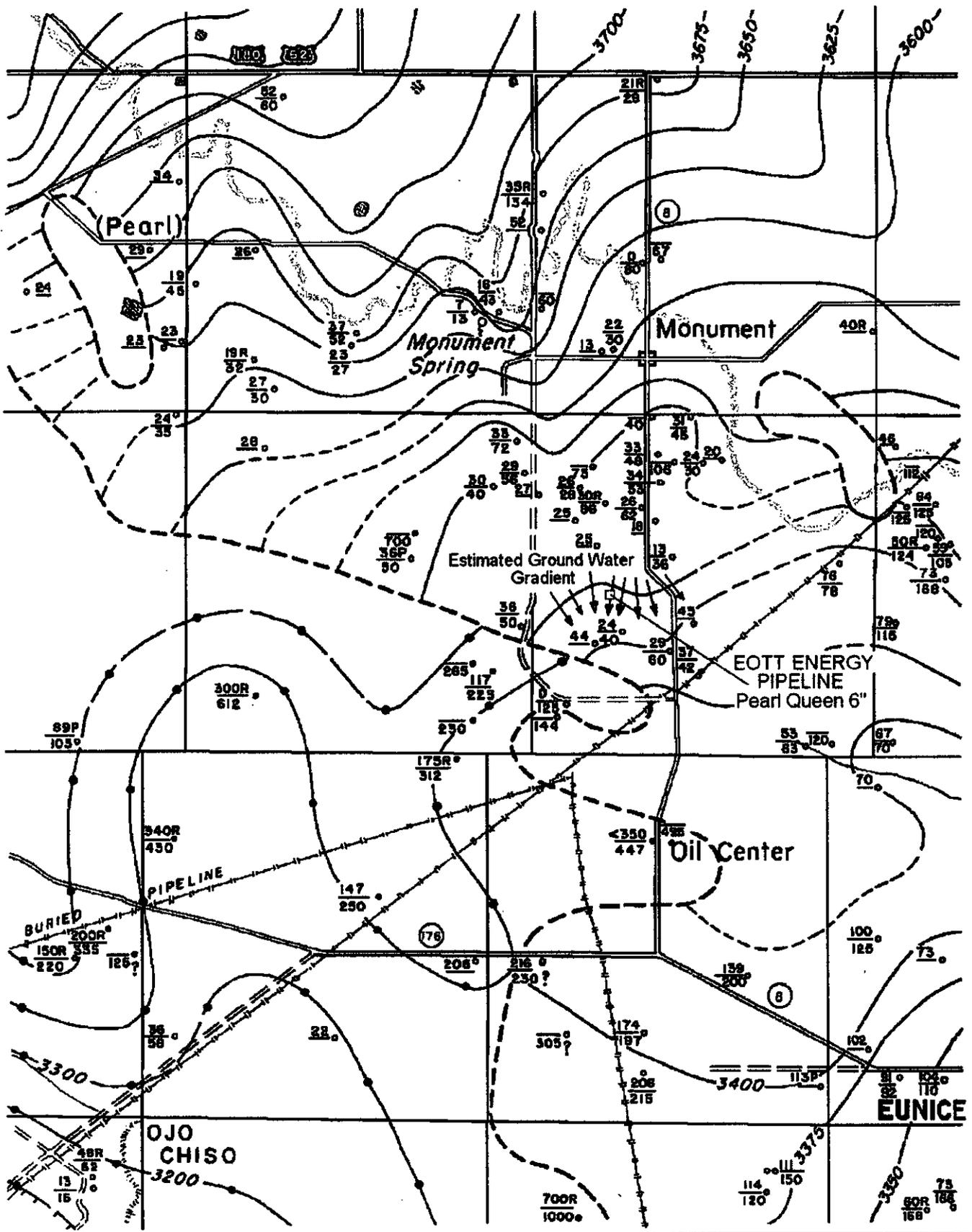
Site Map: with site features (GPS Demarcation)



Topographic Site Map



Nicholson & Clebsch Ground Water Map of Lea County (1961)



Attachment II: Laboratory Analytical Reports and Summaries

Tabular Summary of Analytical Data (Soil and Water Samples)

E.O.T.T. Pearl Queen 6" Soil and Monitoring Well Data Table								
Parameter	Units	6-Dec-99 SOIL NORTH <100	6-Dec-99 SOIL SOUTH <100	6-Dec-99 H ₂ O NORTH	6-Dec-99 H ₂ O SOUTH	22-Sep-00 EPQ20GW	24-Jan-01 GW12401EPQMW	13-Jan-01 EPQMW61301GW
VOC ¹	mg/Kg	20	20	NA	NA	NA	NA	NA
TPH ²	mg/L	NA	NA	0.012	0.011	1	4	0.375
Benzene	mg/L	NA	NA	0.012	0.012	0.001 ³	0.001	0.001
Toluene	mg/L	NA ⁴	NA	0.004	0.004	0.001	0.001	0.001
Ethylbenzene	mg/L	NA	NA	0.011	0.009	0.001	0.001	0.001
m,p-Xylene	mg/L	NA	NA	0.022	0.021	0.001	0.001	0.001
o-Xylene	mg/L	NA	NA	0.061	0.057	0.005	0.005	0.005
BTEX ⁵	mg/L	NA	NA	NA	NA	12.13	9.67	NA
Potassium (K)	mg/L	NA	NA	NA	NA	95.00	92.30	NA
Magnesium (Mg)	mg/L	NA	NA	NA	NA	108.90	133.60	NA
Calcium (Ca)	mg/L	NA	NA	NA	NA	149.40	129.40	NA
Sodium (Na)	mg/L	NA	NA	NA	NA	602.00	620.00	NA
Chloride (Cl)	mg/L	NA	NA	NA	NA	194.00	127.00	NA
Sulfate (SO ₄)	mg/L	NA	NA	NA	NA	224.00	234.00	NA
Bicarbonate (HCO ₃)	mg/L	NA	NA	NA	NA	2.00	1.00	NA
Carbonate (CO ₃)	mg/L	NA	NA	NA	NA	1799.00	1857.00	NA
TDS	mg/L	NA	NA	NA	NA	7.39	7.18	NA
pH	SU	NA	NA	NA	NA	NA	NA	NA
Polycyclic Aromatic Hydrocarbons (PAH) - EPA SW846 8270 (mg/L)								
Naphthalene	mg/L	NA	NA	NA	NA	0.005	0.005	NA
Acenaphthylene	mg/L	NA	NA	NA	NA	0.005	0.005	NA
Acenaphthene	mg/L	NA	NA	NA	NA	0.005	0.005	NA
Flourene	mg/L	NA	NA	NA	NA	0.005	0.005	NA
Phenanthrene	mg/L	NA	NA	NA	NA	0.005	0.005	NA
Anthracene	mg/L	NA	NA	NA	NA	0.005	0.005	NA
Flouanthene	mg/L	NA	NA	NA	NA	0.005	0.005	NA
Pyrene	mg/L	NA	NA	NA	NA	0.005	0.005	NA
Benzo [a] Anthracene	mg/L	NA	NA	NA	NA	0.005	0.005	NA
Chrysene	mg/L	NA	NA	NA	NA	0.005	0.005	NA
Benzo [b] Fluoranthene	mg/L	NA	NA	NA	NA	0.005	0.005	NA
Benzo [k] Fluoranthene	mg/L	NA	NA	NA	NA	0.005	0.005	NA
Benzo [a] Pyrene	mg/L	NA	NA	NA	NA	0.005	0.005	NA
Indeno [1,2,3,-CD] Pyrene	mg/L	NA	NA	NA	NA	0.005	0.005	NA
Dibenz [a,h] Anthracene	mg/L	NA	NA	NA	NA	0.005	0.005	NA
Benzo [g,h,i] Perylene	mg/L	NA	NA	NA	NA	0.005	0.005	NA

¹Headspace VOC determined with Photo-Ionization Detector. ²TPH = GRO + DRO ³Italicized values are reported as "less than (<) instrument detection limits".
⁴NA - Not Analyzed ⁵BTEX - Sum of Benzene, Toluene, Ethyl Benzene, and Total Xylene. Less than values are considered "de minimus" and included in the sum.

**Lab Analyses and Chain-of-Custody Forms
(Dec-1999, Sept-2000, Jan-2001, June-2001)**

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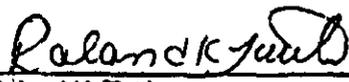
EOTT ENERGY
ATTN: MR. FRANK HERNANDEZ
P.O. BOX 1660
MIDLAND, TEXAS 79703
FAX: 505-392-2946
FAX: 815-687-2713 (Lennah Frost)

Sample Type: Water
Sample Condition: Intact/Iced
Project #: Pearl Queen
Project Name: None Given
Project Location: South of Monument

Sampling Date: 12/06/99
Receiving Date: 12/06/99
Analysis Date: 12/06/99

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
22015	Water North	0.012	0.012	0.004	0.011	0.022
22018	Water South	0.011	0.012	0.004	0.009	0.021
	% IA	104	101	102	104	102
	% EA	97	92	95	98	96
	BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8021B,5030



Roland K. Tuttle

12-7-99
Date

ENVIRONMENTAL LAB OF , INC.

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EOTT ENERGY
ATTN: MR. FRANK HERNANDEZ
P.O. BOX 1660
MIDLAND, TEXAS 79703
FAX: 505-392-2946
FAX: 915-687-2713 (Lennah Frost)

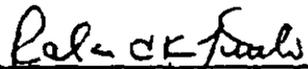
Sample Type: Soil
Sample Condition: Intact/Iced
Project #: Pearl Queen
Project Name: None Given
Project Location: South of Monument

Sampling Date: 12/06/99
Receiving Date: 12/06/99
Analysis Date: 12/06/99

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C25 mg/kg
22013	East Wall North	<10	<10
22014	East Wall South	<10	<10

% INSTRUMENT ACCURACY	109	92
% EXTRACTION ACCURACY	112	82
BLANK	<10	<10

Methods: EPA SW 846-8015M GRO/DRO


Roland K. Tuttle

12-7-99
Date

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EOTT
ATTN: MR. FRANK HERNANDEZ
P.O. BOX 5050
HOBBS, N.M. 88240
FAX: 505-392-2946
FAX: 505-394-2600 (Pat McCasland)

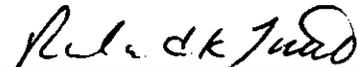
Sample Type: Water
Sample Condition: Intact/ Iced/ HCl
Project #: 7397 LF-72
Project Name: Pearl Queen Sec 20
Project Location: Unit C Sec 20 T20S R37E

Sampling Date: 09/22/00
Receiving Date: 09/22/00
Analysis Date: See Below

ELT#	FIELD CODE	pH s.u.	TDS mg/L	Chloride mg/L	Sulfate mg/L	Carbonate mg/L	Bicarbonate mg/L
31191	EPQ20GW	7.39	1799	602	194	<2	224

QUALITY CONTROL	7.22	*	5140	47.6	*	*
TRUE VALUE	7.00	*	5000	50.0	*	*
% INSTRUMENT ACCURACY	103	*	103	95	*	*
BLANK	*	<5	<5	<1.0	<2	<2
ANALYSIS DATE	10/6/00	9/26/00	10/6/00	10/6/00	10/6/00	10/6/00

METHODS: EPA 150.1. 160.1. 325.3. 375.4. 310.1


Raland K. Tuttle

10-14-00
Date

ENVIRONMENTAL LAB OF , INC.

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EOTT
ATTN: MR. FRANK HERNANDEZ
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HOBBS, N.M. 88240
FAX: 505-392-2946
FAX: 505-394-2600 (Pat McCasland)

Sample Type: Water
Sample Condition: Intact/ Iced/ HCl
Project #: 7397 LF-72
Project Name: Pearl Queen Sec 20
Project Location: Unit C Sec 20 T20S R37E

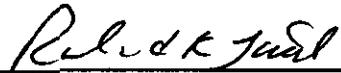
Sampling Date: 09/22/00
Receiving Date: 09/22/00
Analysis Date: 10/01/00
Field Code: EPQ20GW

EPA SW846 8270 (mg/L)	REPORT LIMIT	ELT# 31191	RPD	%EA	%DEV
Naphthalene	0.005	ND			11.1
Acenaphthylene	0.005	ND			16.9
Acenaphthene	0.005	ND	31	38	15.9
Fluorene	0.005	ND			3.0
Phenanthrene	0.005	ND			2.4
Anthracene	0.005	ND			3.0
Fluoranthene	0.005	ND			8.9
Pyrene	0.005	ND	31	48	20.4
Benzo[a]anthracene	0.005	ND			13.7
Chrysene	0.005	ND			11.6
Benzo[b]fluoranthene	0.005	ND			16.4
Benzo[k]fluoranthene	0.005	ND			20.6
Benzo [a]pyrene	0.005	ND			18.9
Indeno[1,2,3-cd]pyrene	0.005	ND			2.7
Dibenz[a,h]anthracene	0.005	ND			6.4
Benzo[g,h,i]perylene	0.005	ND			5.4

% RECOVERY

Nitrobenzene-d5 SURR 74
2-Fluorobiphenyl SURR 109
p-Terphenyl-d14 SURR 109

ND= not detected at report limit.
Method: EPA SW 846 8270C , 3510


Raland K. Tuttle

10-14-00
Date

ENVIRONMENTAL LAB OF , INC.

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EOTT
ATTN: MR. FRANK HERNANDEZ
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FAX: 505-392-2946
FAX: 505-394-2600 (Pat McCasland)

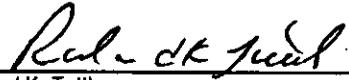
Sample Type: Water
Sample Condition: Intact/ Iced/ HCl
Project #: 7397 LF-72
Project Name: Pearl Queen Sec 20
Project Location: Unit C Sec 20 T20S R37E

Sampling Date: 09/22/00
Receiving Date: 09/22/00
Analysis Date: BTEX 10/03/00
Analysis Date: TPH 9/25/00

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L	TPH mg/L
31191	EPQ20GW	<0.001	<0.001	<0.001	<0.001	<0.001	1

%IA	95	101	96	102	101	96
%EA	97	104	102	107	106	.
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001	<1

METHODS: EPA SW 846-8021B ,5030, EPA 418.1


Raland K. Tuttle

10-14-00
Date

ENVIRONMENTAL LAB OF , INC.

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EOTT
ATTN: MR. FRANK HERNANDEZ
P.O. BOX 5050
HOBBS, N.M. 88240
FAX: 505-392-2946
FAX: 505-394-2600 (Pat McCasland)

Sample Type: Water
Sample Condition: Intact/ Iced/ HCl
Project #: 7397 LF-72
Project Name: Pearl Queen Sec 20
Project Location: Unit C Sec 20 T20S R37E

Sampling Date: 09/22/00
Receiving Date: 09/22/00
Analysis Date: 10/04/00

ELT#	FIELD CODE	Na mg/L	Ca mg/L	Mg mg/L	K mg/L
31191	EPQ20GW	149.4	108.9	95.0	12.13

% INSTRUMENT ACCURACY	109	101	97	103
% EXTRACTION ACCURACY	110	103	101	100
BLANK	<0.10	<0.10	<0.01	<0.01

METHODS: SM 7000 series

Raland K Tuttle
Raland K. Tuttle

10-14-00
Date

Project Manager: FRANK HERNANDEZ
Phone #: 505-390-0712
Company Name & Address: EDTT
 Box 5050 Hobbs, NM 88240
Project #: 9397 LF-72
Project Name: Peach Queen Sec 20
Project Location: Unit C, Sec 20, T20S R37E
Sampler Signature: *[Signature]*

ANALYSIS REQUEST
 1 of 1

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX				PRESERVATIVE METHOD				SAMPLING		TCLP Metals Ag As Ba Cd Cr Pb Hg Se TCLP Volatiles	TCLP Semi Volatiles	TDS	HCl	PH	Anions (Nitrate, Nitrite, Phosphate)	
				WATER	SOIL	SLUDGE	OTHER	HCL	LIHQ3	ICE	LIQHE	OTHER	DATE							TIME
✓	EP020GW	2	✓	✓	✓	✓	✓	✓	✓	✓	✓	9/22/00	0700	✓						
✓	EP020GW	1	✓	✓	✓	✓	✓	✓	✓	✓	✓	"	0705							
31191	EP020GW	1	✓	✓	✓	✓	✓	✓	✓	✓	✓	"	0710							
✓	EP020GW	1	✓	✓	✓	✓	✓	✓	✓	✓	✓	"	0715	✓						

REMARKS:
 Originals to F. Hernandez & Pat McCasland EPI
 FAX to F. Hernandez & Pat McCasland 505.394.2606

Received by: *[Signature]* **Date:** 9/22/00

Received by Laboratory: *[Signature]* **Date:** 9/22/00

Received by Laboratory: *[Signature]* **Date:** 9/22/00

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT ENERGY
ATTN: MR. FRANK HERNANDEZ
P.O. BOX 5050
HOBBS, N.M. 88240
FAX: 505-392-2946
FAX: 505-394-2601 (Pat McCasland)

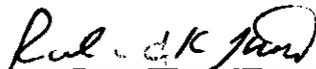
Sample Type: Water
Sample Condition: Intact/ Iced/-1.0 C
Project #: 7397 LF-72
Project Name: Pearl Queen Sec. 20
Project Location: Unit C Sec. 20 T20S R37E

Sampling Date: 01/24/01
Receiving Date: 01/26/01
Analysis Date: 01/26/01

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
36839	GW12401EPQMW-1	<0.001	<0.001	<0.001	<0.001	<0.001
36840	GW12401EPQMW-1	<0.001	<0.001	<0.001	<0.001	<0.001

% IA	88	87	89	89	92
% EA	86	85	86	86	88
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846- 8021B,5030


Roland K. Tuttle

2-8-01
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT
ATTN: MR. FRANK HERNANDEZ
P. O. BOX 5050
HOBBS, N.M. 88240
FAX: 505-392-2946
FAX: 505-394-2600 (Pat Mc Casland)

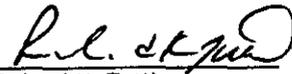
Sample Type: Water
Sample Condition: Intact/ Iced/ -1.0 deg C
Project #: 7397 LF-72
Project Name: Pearl Queen Sec. 20
Project Location: Unit C, Sec. 20 T20S R37E

Sampling Date: 01/24/01
Receiving Date: 01/26/01
Analysis Date: 01/30/01

ELT#	FIELD CODE	TPH mg/L
36841	GW12401EPQMW-2	4

% INSTRUMENT ACCURACY	97.3
% EXTRACTION ACCURACY	95.6
BLANK	<1

Methods: EPA 418.1


Raland K. Tuttle

2-9-01
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT
ATTN: MR. FRANK HERNANDEZ
P.O. BOX 5050
HOBBS, N.M. 88240
FAX: 505-392-2946
FAX: 505-394-2600 (Pat McCasland)

Sample Type: Water
Sample Condition: Intact/ Iced/ -1.0 deg. C
Project #: 7397 LF-72
Project Name: Pearl Queen Sec 20
Project Location: Unit C Sec 20 T20S R37E

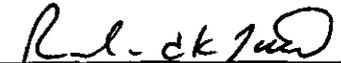
Sampling Date: 01/24/01
Receiving Date: 01/26/01
Analysis Date: 02/06/01
Field Code: GW12401EPQMW-3

EPA SW846 8270 (mg/L)	REPORT LIMIT	ELT# 36842	RPD	%EA	%DEV
Naphthalene	0.005	ND			5.3
Acenaphthylene	0.005	ND			-6.6
Acenaphthene	0.005	ND	1	106	0
Fluorene	0.005	ND			-8.3
Phenanthrene	0.005	ND			2.2
Anthracene	0.005	ND			5.1
Fluoranthene	0.005	ND			-1.2
Pyrene	0.005	ND	8	105	-15.6
Benzo[a]anthracene	0.005	ND			-11.6
Chrysene	0.005	ND			0
Benzo[b]fluoranthene	0.005	ND			15.8
Benzo[k]fluoranthene	0.005	ND			-16.1
Benzo [a]pyrene	0.005	ND			-8.1
Indeno[1,2,3-cd]pyrene	0.005	ND			3.4
Dibenz[a,h]anthracene	0.005	ND			10.8
Benzo[g,h,i]perylene	0.005	ND			-7

% RECOVERY

Nitrobenzene-d5 SURR 61
2-Fluorobiphenyl SURR 79
p-Terphenyl-d14 SURR 120

ND= not detected at report limit.
Method: EPA SW 846 8270C , 3510


Ronald K. Tuttle

2-9-01
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

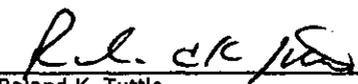
EOTT
ATTN: MR. FRANK HERNANDEZ
P.O. BOX 5050
HOBBS, N.M. 88240
FAX: 505-392-2946
FAX: 505-394-2600 (Pat McCasland)

Sample Type: Water
Sample Condition: Intact/ Iced/ -1.0 deg C
Project #: 7397 LF-72
Project Name: Pearl Queen Sec 20
Project Location: Unit C Sec 20 T20S R37E

Sampling Date: 01/24/01
Receiving Date: 01/26/01
Analysis Date: See Below

ELT#	FIELD CODE	pH s.u.	TDS mg/L	Chloride mg/L	Sulfate mg/L	Carbonate mg/L	Bicarbonate mg/L
36843	GW12401EPQMW-4	7.18	1857	620	127.0	<1	234

QUALITY CONTROL	7.02	*	5140	44.4	*	*
TRUE VALUE	7.00	*	5000	50.0	*	*
% INSTRUMENT ACCURACY	100	*	103	89	*	*
BLANK	*	<10	<10	<1.0	<2	<2
ANALYSIS DATE	01/26/01	01/29/01	02/08/01	01/31/01	01/29/01	01/29/01
METHODS: EPA 150.1, 160.1, 325.3, 375.4, 310.1						


Raland K. Tuttle

2-9-01
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT
ATTN: MR. FRANK HERNANDEZ
P.O. BOX 5050
HOBBS, N.M. 88240
FAX: 505-392-2946
FAX; 505-394-2600 (Pat McCasland)

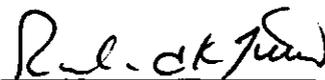
Sample Type: Water
Sample Condition: Intact/ Iced/ -1.0 deg. C
Project #: 7397 LF-72
Project Name: Pearl Queen Sec 20
Project Location: Unit C Sec 20 T20S R37E

Sampling Date: 01/24/01
Receiving Date: 01/26/01
Analysis Date: 02/09/01

ELT#	FIELD CODE	Na mg/L	Ca mg/L	Mg mg/L	K mg/L
36843	GW12401EPQMW-4	129.4	133.6	92.30	9.669

% INSTRUMENT ACCURACY	102	100	98	98
% EXTRACTION ACCURACY	86	98	101	87
BLANK	<0.10	<0.10	<0.10	<0.10

METHODS: SW846-6010



Raland K. Tuttle

2-9-01
Date

Environmental Lab of Texas, Inc. 12600 West I-20 East Odessa, Texas 79763
 (915) 563-1800 FAX (915) 563-1713

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Phone #: 505-390-0912
 FAX #: 505-394-2966

Project Manager: **FRANK HERNANDEZ**

Company Name & Address: **Fort Hobbs NM 88240**

Project #: **7397 LF-72**
 Project Location: **White Sec 20 T203 R37E**

Project Name: **PEARL OREN Sec 20**
 Sampler Signature: *Andy Malla*

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX					PRESERVATIVE METHOD					SAMPLING		
				WATER	SOIL	AIR	SLUDGE	OTHER	ICL	INOC	ICE	MOLE	OTHER	DATE	TIME	
36839	6W12401EPAMW-1	1		X						X					1-24	
36840	6W12401EPAMW-1	1		X						X					1-24	
36841	6W12401EPAMW-2	1		X						X					1-24	
36842	6W12401EPAMW-3	1		X						X					1-24	
36843	6W12401EPAMW-4	1		X						X					1-24	

ANALYSIS REQUEST

UTEX K02W/SU20	✓
TPH 418.1	✓
TCLP Metals Ag As Ba Cd Cr Pb Hg Se	
Total Metals Ag As Ba Cd Cr Pb Hg Se	
TCLP Volatiles	
TCLP Semi Volatiles	
(TDS)	
(HCl)	
PAH	✓
PH	✓

Analysis Requested by: G. S. O'Neil, M.S., Ph.D., K. Mag...

RECEIVED BY: *Andy Malla*
 DATE: 1-26-01
 RECEIVED BY: *Jane McNamee*
 DATE: 1-26-01
 RECEIVED BY: *F. Hernandez + Pat McCasland EPT*
 DATE: Rec - 1.0°C
 REMARKS: ORIGINALS TO F. Hernandez + Pat McCasland EPT
 FAX TO F. Hernandez + P. Mc. 505-394-2600

Client: Environmental Plus, Inc.
 Attn: Pat McCasland
 Address: 1324 M.St Po Box
 Eunice, NM 88231
 Phone: (505) 394-3481 FAX: (505) 394-2601

Report#/Lab ID#: 114266 Report Date: 06/25/01
 Project ID: LF-72
 Sample Name: EPQMW61301GW
 Sample Matrix: water
 Date Received: 06/15/2001 Time: 14:00
 Date Sampled: 06/13/2001 Time: 10:40

REPORT OF ANALYSIS

QUALITY ASSURANCE DATA¹

Parameter	Result	Units	RQL ⁵	Blank	Date	Method ⁶	Data Qual ⁷	Prec. ²	Recov. ³	CCV ⁴	LCS ⁴
Volatile organics-8260b/BTEX											
Benzene	<1	µg/L	1	<1	06/21/01	8260b	---	---	---	---	---
Ethylbenzene	<1	µg/L	1	<1	06/21/01	8260b	J	0.2	76.7	89	79
m,p-Xylenes	<1	µg/L	1	<1	06/21/01	8260b	---	3.2	95.8	98.6	97.7
o-Xylene	<1	µg/L	1	<1	06/21/01	8260b	---	3	96.4	100.9	97.8
Toluene	<1	µg/L	1	<1	06/21/01	8260b	---	2.8	96.6	99	98.7
					06/21/01			0.1	83.7	90	84.3

This analytical report is respectfully submitted by AnalySys, Inc. The enclosed results have been carefully reviewed and, to the best of my knowledge, the analytical results are consistent with AnalySys, Inc.'s Quality Assurance/Quality Control Program. © Copyright 2000, AnalySys, Inc., Austin, TX. All rights reserved. No part of this publication may be reproduced or transmitted in any form or by any means without the express written consent of AnalySys, Inc.

Respectfully Submitted,
Richard Laster
 Richard Laster

1. Quality assurance data is for the sample batch which included this sample. 2. Precision (PREC) is the absolute value of the relative percent (%) difference between duplicate measurements. 3. Recovery (Recov.) is the percent (%) of analyte recovered from a spiked sample. 4. Calibration Verification (CCV) and Laboratory Control Sample (LCS) results are expressed as the percent (%) recovery of analyte from a known standard or matrix. 5. Reporting Quantitation Limits (RQL), typically at or above the Practical Quantitation Limit (PQL) of the analytical method. 6. Method numbers typically denote USEPA procedures. Less than (<) values reflect nominal quantitation limits adjusted for any required dilutions. 7. Data Qualifiers are J = analyte potentially present between the PQL and the MDL, B = Analyte detected in associated method blank(s). S1 =MS and/or MSD recovery exceed advisory limits. S2 =Post digestion spike (PDS) recovery exceeds advisory limit. S3 =MS and/or MSD and PDS recoveries exceed advisory limits. P =Precision higher than advisory limit. M =Matrix interference.



4221 Freidrich Lane, Suite 190, Austin, TX 78744 &
 2209 N. Padre Island Dr., Corpus Christi, TX 78408
 (512) 444-5896 • FAX (512) 447-4766

Client: Environmental Plus, Inc.
 Attn: Pat McCasland
 Address: 1324 M. St Po Box
 Eunice, NM 88231

Phone: (505) 394-3481 FAX: (505) 394-2601

Report#/Lab ID#: 114267 Report Date: 06/27/01
 Project ID: LF-72
 Sample Name: EPQMW61301GW
 Sample Matrix: water
 Date Received: 06/15/2001 Time: 14:00
 Date Sampled: 06/13/2001 Time: 10:42

REPORT OF ANALYSIS

Parameter	Result	Units	RQL ⁵	Blank	Date	Method ⁶	Data Qual ⁷	Prec. ²	Recov. ³	CCV ⁴	LCS ⁴
Petroleum hydrocarbons	<0.375	mg/L	0.375	<0.375	06/26/01	418.1	---	3.07	72.41	110.08	108.32

QUALITY ASSURANCE DATA¹

This analytical report is respectfully submitted by AnalySys, Inc. The enclosed results have been carefully reviewed and, to the best of my knowledge, the analytical results are consistent with AnalySys, Inc.'s Quality Assurance/Quality Control Program. © Copyright 2000, AnalySys, Inc., Austin, TX. All rights reserved. No part of this publication may be reproduced or transmitted in any form or by any means without the express written consent of AnalySys, Inc.

Respectfully Submitted,

Richard Laster

Richard Laster

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Client: Environmental Plus, Inc.
Attn: Pat McCasland

Project ID: LF-72
Sample Name: EPQMW61301GW

Report#/Lab ID#: 114266
Sample Matrix: water

REPORT OF SURROGATE RECOVERY

Surrogate Compound	Method	Recovery	Recovery Limit	Data Qualifiers
1,2-Dichloroethane-d4	8260b	89.6	80-120	---
Toluene-d8	8260b	93.4	88-110	---

Data Qualifiers: D= Surrogates diluted and X= Surrogates outside advisory recovery limits.

Client: Environmental Plus, Inc.
Attn: Pat McCasland
Address: 1324 M.St Po Box
 Eunice, NM 88231
Phone: (505) 394-3481 **FAX:** (505) 394-2601

Report#/Lab ID#: 114268 **Report Date:** 06/25/01
Project ID: LF-72
Sample Name: Trip Blank
Sample Matrix: water
Date Received: 06/15/2001 **Time:** 14:00
Date Sampled: not on C-O-C **Time:** 00:00

REPORT OF ANALYSIS

QUALITY ASSURANCE DATA

Parameter	Result	Units	RQL ⁵	Blank	Date	Method ⁶	Data Qual ⁷	Prec. ²	Recov. ³	CCV ⁴	LCS ⁴
Volatile organics-8260b/BTEX											
Benzene	<1	µg/L	1	<1	06/21/01	8260b	---	0.2	76.7	89	70
Ethylbenzene	<1	µg/L	1	<1	06/21/01	8260b	---	3.2	95.8	98.6	97.7
m,p-Xylenes	<1	µg/L	1	<1	06/21/01	8260b	J	3	96.4	100.9	97.8
o-Xylene	<1	µg/L	1	<1	06/21/01	8260b	---	2.8	96.6	99	98.7
Toluene	<1	µg/L	1	<1	06/21/01	8260b	J	0.1	83.7	90	84.3

This analytical report is respectfully submitted by AnalySys, Inc. The enclosed results have been carefully reviewed and, to the best of my knowledge, the analytical results are consistent with AnalySys, Inc.'s Quality Assurance/Quality Control Program. © Copyright 2000, AnalySys, Inc., Austin, TX. All rights reserved. No part of this publication may be reproduced or transmitted in any form or by any means without the express written consent of AnalySys, Inc.

Respectfully Submitted,

Richard Laster

Richard Laster

1. Quality assurance data is for the sample batch which included this sample. 2. Precision (PREC) is the absolute value of the relative percent (%) difference between duplicate measurements. 3. Recovery (Recov.) is the percent (%) of analyte recovered from a spiked sample. 4. Calibration Verification (CCV) and Laboratory Control Sample (LCS) results are expressed as the percent (%) recovery of analyte from a known standard or matrix. 5. Reporting Quantitation Limits (RQL), typically at or above the Practical Quantitation Limit (PQL) of the analytical method. 6. Method numbers typically denote USEPA procedures. Less than (" $<$ ") values reflect nominal quantitation limits adjusted for any required dilutions. 7. Data Qualifiers are J = analyte potentially present between the PQL and the MDL. B = Analyte detected in associated method blank(s). S1 =MS and/or MSD recovery exceed advisory limits. S2 =Post digestion spike (PDS) recovery exceeds advisory limit. S3 =MS and/or MSD and PDS recoveries exceed advisory limits. P =Precision higher than advisory limit. M =Matrix interference.

221 Freidrich Lane, Suite 190, Austin, TX 7
(512) 444-5896

Bill to (if different):

Company Name EOT Energy
Address P.O. Box 1660
City Midland State TX Zip 79702
ATTN: Frank Hernandez
Phone 832-3299 Fax 915-624-3499

Company Name Environmental Plus Inc.
Address P.O. Box 1558
City Euless State TX Zip 75023
ATTN: Pat McCasland
Phone 505-594-3481 Fax 505-594-2601

Rush Status (must be confirmed with lab mgr.):
Project Name/PO#: LF-22 Sampler: B. Stevens

Analyses Requested (1)
Please attach explanatory information as requested

Handwritten notes:
STATION 111915082818
STATION 111915082818
STATION 111915082818

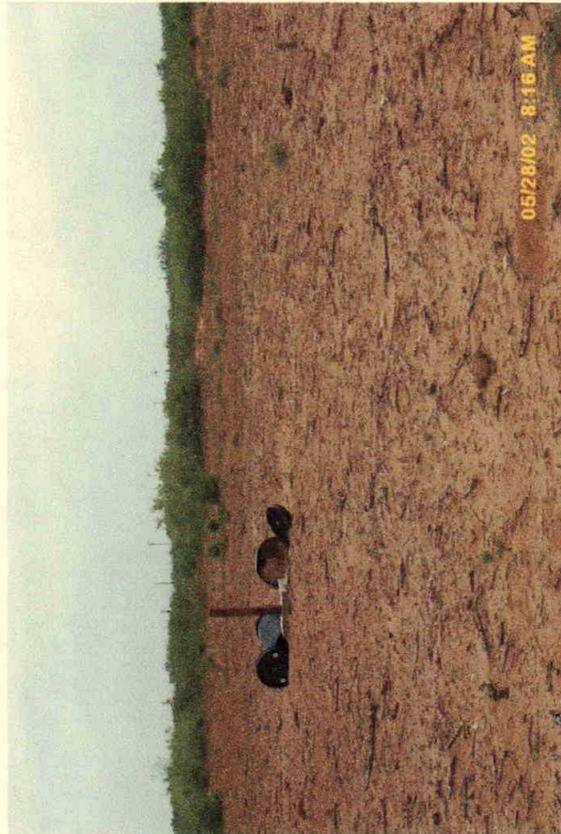
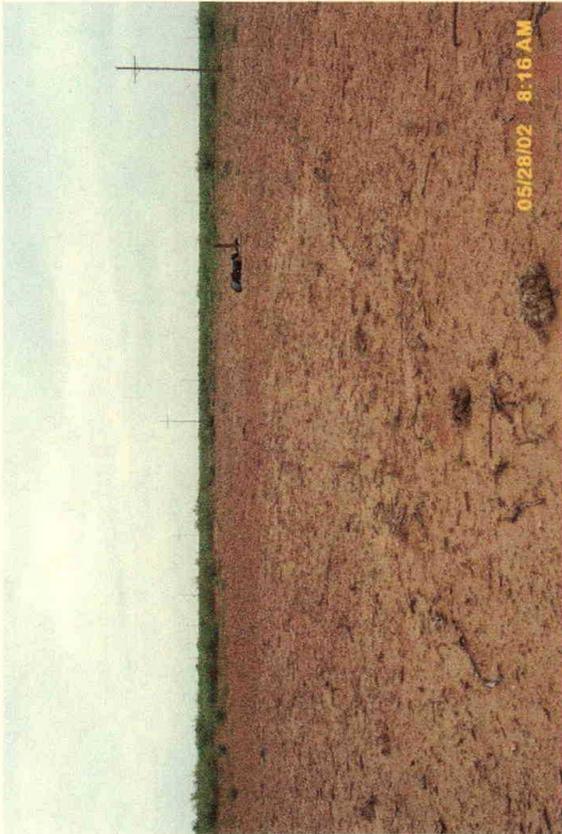
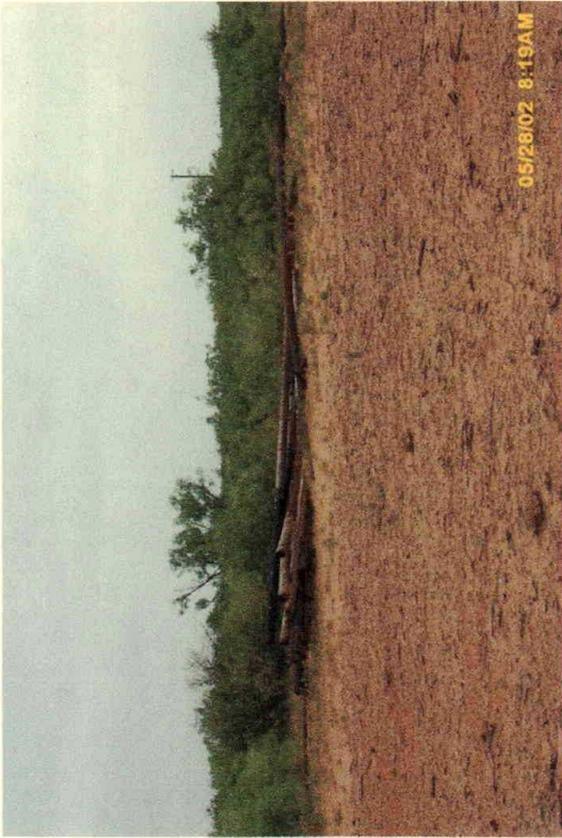
Client Sample No. / Description/Identification	Date Sampled	Time Sampled	No. of Containers	Soil	Water	Waste	Lab I.D. # (Lab only)	Comments
EPQAW61301GW	6-13-01	12:40	2		✓		114266	✓
EPQAW61301GW	6-13-01	10:42	1		✓		114267	X
TRCY Black			1				114268	X

(1) Unless specifically requested otherwise on this Chain-of-custody and/or attached documentation, all analyses will be conducted using ASI's method of choice and all data will be reported to ASI's normal reporting limits (MDL/PQL). For GC/MS volatiles and extractables, unless specific analytical parameter lists are specified on this chain-of-custody or attached to this chain-of-custody, ASI will default to Priority Pollution ASI's HSL list at ASI's option. Specific compound lists must be supplied for all GC procedures.

Sample Relinquished By			Sample Received By		
Name	Affiliation	Date	Name	Affiliation	Date
B. Stevens	Environmental Plus Inc.	6-13-01	F. Hernandez	ASI	6-15-01
					14:00

[Tendering of above described samples to AnalySys, Inc. for analytical testing constitutes agreement by buyer/sampler to AnalySys, Inc.'s standard terms.]

Attachment III: Photographs



Attachment IV: Regulatory and Summary Forms

Site Information and Metrics

SITE: Pearl Queen 6" Gathering		Assigned Site Reference #: Pearl Queen 6"	
Company: EOTT			
Company Street Address: 5805 E. Highway 80, Midland, Texas 79701			
Company Mailing Address: P.O. Box 1660			
Company City, State, Zip: Midland, Texas 79702			
Company Representative: Wayne Brunette			
Company Representative Telephone: 915.556.0190			
Company Telephone: 915.684.3451 Fax: 915.687.2713			
Fluid volume released (bbls) = 15 (8 recovered)			
>25 bbls : Notify NMOCD verbally within 24 hrs and submit form C-141 within 15 days. (Also applies to unauthorized releases >500 mcf Natural Gas)			
5-25 bbls: Submit form C-141 within 15 days (Also applies to unauthorized releases of 50-500 mcf Natural Gas)			
Leak, Spill, or Pit (LSP) Name: Pearl Queen 6" Gathering			
Source of contamination: Pipe Corrosion			
Land Owner, i.e., BLM, ST, Fee, Other: New Mexico State Land Office			
LSP Dimensions: affected area = ~97' NS x 162' EW (Elliptical shape)			
LSP Area = ~14,644 ft ²			
Location of Reference Point (RP): Oil well			
Location distance and direction from RP: NE ~100-ft			
Latitude: 32° 33' 51N			
Longitude: 103° 16' 33W			
Elevation above mean sea level: ~ 3445' amsl			
Feet from South Section Line			
Feet from West Section Line			
Location- Unit or ¼¼ = NE¼ of NW¼ (UL-C)			
Location- Section = 20			
Location- Township = T20S			
Location- Range = R37E			
Surface water body within 1000' radius of site: None			
Surface water body within 1000' radius of site			
Domestic water wells within 1000' radius of site: None			
Domestic water wells within 1000' radius of site			
Agricultural water wells within 1000' radius of site: None			
Agricultural water wells within 1000' radius of site			
Public water supply wells within 1000' radius of site: None			
Public water supply wells within 1000' radius of site			
Depth from land surface to ground water (DG): 27-feet			
Depth of contamination (DC): Contaminated soil removed down to water table, 2-ft clay barrier installed.			
Depth to ground water (DG - DC = DtGW)			
1. Ground Water		2. Wellhead Protection Area	
If Depth to GW <50 feet: 20 points		If <1000' from water source, or; <200' from private domestic water source: 20 points	
If Depth to GW 50 to 99 feet: 10 points			
If Depth to GW >100 feet: 0 points		If >1000' from water source, or; >200' from private domestic water source: 0 points	
Ground water Score = 20		Wellhead Protection Area Score = 0	
Surface Water Score = 0			
Site Rank (1+2+3) = 20+0+0 = 20 points			
Total Site Ranking Score and Acceptable Concentrations			
Parameter	>19	10-19	0-9
Benzene ¹	10 ppm	10 ppm	10 ppm
BTEX ¹	50 ppm	50 ppm	50 ppm
TPH	100 ppm	1000 ppm	5000 ppm
¹ 100 ppm field VOC headspace measurement may be substituted for lab analysis			

09-16-99; 12-10-99; 02-16-00 C-141 Submittals to NMOCD

811 South Plaza
 Artesia, NM 88210
 District III - (505) 334-6178
 1000 Rio Brazos Road
 Artec, NM 87410
 District IV - (505) 827-7131

OIL CONSERVATION DIVISION
 2040 South Pacheco Street
 Santa Fe, New Mexico 87505
 (505) 827-7131

Submit 2 copies to
 Appropriate District
 Office in accordance
 with Rule 116 on
 back side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name EO TT Energy Pipeline	Contact Lennah Frost
Address PO Box 1660 Midland Tx 79702	Telephone No. 915/16843467
Facility Name Pearl Queen Gathering	Facility Type
Surface Owner State of NM	Mineral Owner
	Lease No.

LOCATION OF RELEASE

East/ West Line	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/ West Line	County
	20	20S	37E					Lea

NATURE OF RELEASE

Type of Release Crude oil	Volume of Release 15 bbls	Volume Recovered 8 bbls
Source of Release Pipe Line Leak	Date and Hour of Occurrence 9/8/99 12 pm	Date and Hour of Discovery Same
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Sylvia	
By Whom? Lennah Frost	Date and Hour 9/8/99 - 2:30	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully (Attach Additional Sheets If Necessary)

Describe Cause of Problem and Remedial Action Taken (Attach Additional Sheets If Necessary)

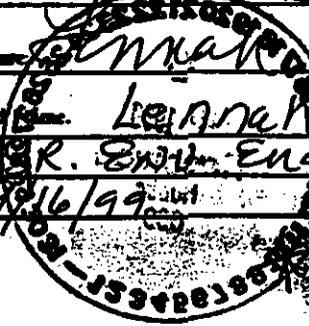
Corrosion leak. Pipe was clamped - will be repaired ASAP.

Describe Area Affected and Cleanup Action Taken (Attach Additional Sheets If Necessary)

Oil pooled @ Leak source. Due to heavy Rain, oil ran down Row approx. 300' x 2'. All contaminated Soil is being hauled and disposed of at J&L Landfarm.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature Lennah Frost	OIL CONSERVATION DIVISION		
Printed Name Lennah Frost	Approved by District Supervisor	Approval Date:	Expiration Date:
Title R. Smith Engineer	Conditions of Approval:	Attached <input type="checkbox"/>	
Date 9/16/99	Phone 915/16843467		



Sent to Santa Fe on 11-22-99 - They impacted gnd. H2O on 9-15-99

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Form C-141
Revised March 17, 1999

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report

Final Report

Name of Company EOTT Energy Pipeline Limited Partnership	Contact Lennah Frost
Address P.O. Box 1660, Midland, TX 79702	Telephone No. 915/684-3467
Facility Name Pearl Queen 6" gathering	Facility Type 6" gathering line

Surface Owner State of New Mexico	Mineral Owner Royalties have been paid	Lease No.
---------------------------------------------	--------------------------------------------------	-----------

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
G	20	20-S	37-E					Lea

NATURE OF RELEASE

Type of Release Crude oil	Volume of Release 15 bbls	Volume Recovered 8 bbls
Source of Release Pipeline leak	Date and Hour of Occurrence 9/8/99 - 12 pm	Date and Hour of Discovery 9/8/99 - same
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Sylvia - Hobbs District Office	
By Whom? Lennah Frost	Date and Hour 9/8/99 - 2:30 pm	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*
Pipeline corrosion. Pipe was repaired.

Describe Area Affected and Cleanup Action Taken.*
Approximately 7500 cubic yards of contaminated soil was excavated and disposed of at J&L Landfarm. Clean soil was used for backfill. Analysis of water and soil from bottom hole and soil from the side walls were taken on 12/6/99 1/11/99. Analysis attached

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: <i>Lennah Frost</i>	OIL CONSERVATION DIVISION	
Printed Name: Lennah Frost	Approved by District Supervisor:	
Title: Sr. Environmental Engineer	Approval Date:	Expiration Date:
Date: 12/10/99 Phone: 915/684-3467	Conditions of Approval:	Attached <input type="checkbox"/>

* Attach Additional Sheets If Necessary

gll

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
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1000 Rio Brazos Road, Aztec, NM 87410
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State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
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Santa Fe, NM 87505

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Revised March 17, 1999

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side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company EOTT Energy Pipeline Limited Partnership		Contact Lennah Frost
Address P.O. Box 1660, Midland, TX 79702		Telephone No. 915/684-3467
Facility Name Pearl Queen 6" gathering		Facility Type 6" gathering line
Surface Owner State of New Mexico	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
G	20	20-3	37-E					Lea

CORRECTED NATURE OF RELEASE

Type of Release Crude Oil	Volume of Release 15 barrels	Volume Recovered 8 bbls
Source of Release Pipeline release	Date and Hour of Occurrence 9/8/99 - 12 pm	Date and Hour of Discovery 9/8/99 - same
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Sylvia - Hobbs District Office	
By Whom? Lennah Frost	Date and Hour 9/8/99 - 2:30 pm	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

~~corrosion due to sulfur in the oil~~ **pipeline corrosion**

Describe Area Affected and Cleanup Action Taken.*

Groundwater was encountered on 9/15/99. Free phase hydrocarbons formed on pool after a couple of days. All of the contaminated soil will be excavated to remove source of groundwater contamination.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

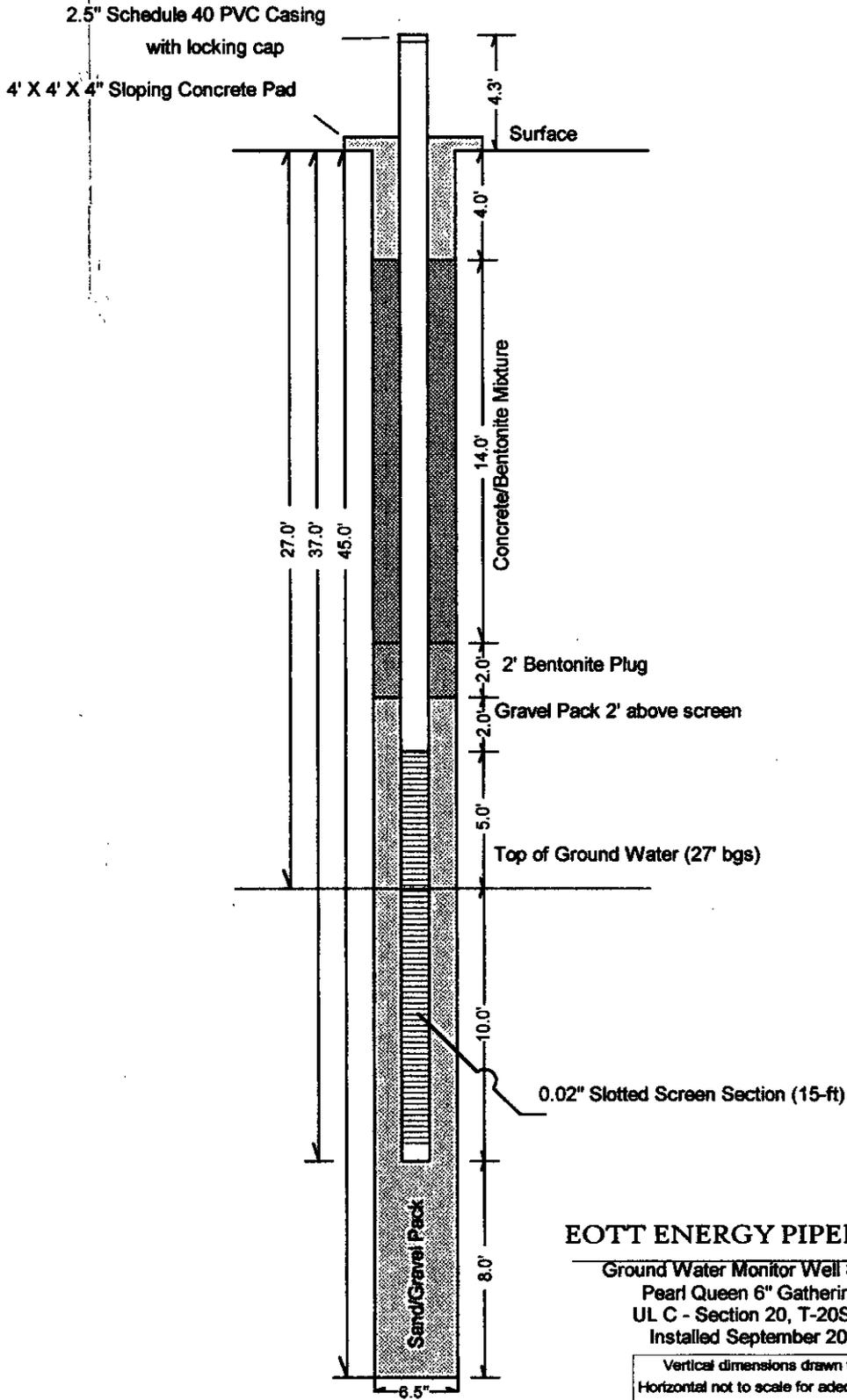
Signature: <i>Lennah Frost</i>	OIL CONSERVATION DIVISION	
Printed Name: Lennah Frost	Approved by District Supervisor:	
Title: Sr. Environmental Engineer	Approval Date:	Expiration Date:
Date: 2/16/70	Phone: 915/684-3467	Conditions of Approval:
		Attached <input type="checkbox"/>

* Attach Additional Sheets If Necessary

sp

Attachment V – Monitor Well Schematic Diagram

Environmental Plus, Inc.



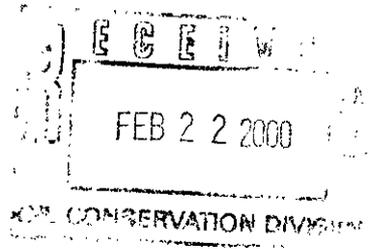
EOTT ENERGY PIPELINE CO.

Ground Water Monitor Well Schematic
 Pearl Queen 6" Gathering Line
 UL C - Section 20, T-20S, R-37E
 Installed September 20, 2000

Vertical dimensions drawn to scale;
 Horizontal not to scale for adequate detail

EOTT ENERGY Pipeline Limited Partnership

P.O. BOX 1660
5805 E. BUSINESS 20
MIDLAND, TEXAS 79702
(915) 682-3761



February 16, 2000

State of New Mexico
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505
Attn: William Olson

**RE: PEARL QUEEN 6" GATHERING LINE
LEA CO., NM**

Dear Mr. Olson:

As per your letter dated February 4, 2000, below are responses to each of your action items:

- Item #1:** Attached is a copy of the written notice of groundwater contamination sent to you on September 16, 1999. Verbal notification was given on 9/15/99. Also attached is a corrected C-141 giving written notification of groundwater contamination.
- Item #2:** Concerning the water samples that were taken from the bottom of the excavation. The benzene levels in both water samples (north - 0.012 mg/L, south - 0.011 mg/L) are just slightly above the WQCC standard of 0.01mg/L. Toluene, ethylbenzene, and total xylenes are all below WQCC standards. EOTT believes that it has removed the source of any groundwater contamination at this site. We propose natural attenuation for the remaining slight contamination on the groundwater. In the event of another release at or near this site, the excavation was capped with a clay liner to prevent future groundwater contamination. EOTT proposes to install at least one monitor well down gradient, directly adjacent to the edge of the excavation to monitor groundwater until four consecutive quarter of clean water have been achieved.
- Item #3:** A soil vapor headspace measurement (PID) was used to determine BTEX levels on soils from the bottom of the excavation. All readings were below 100 ppm. When we install the monitor wells we will also sample on 5' intervals and will take soil samples for analysis of TPH and BTEX. This should verify that the site has been properly remediated to NMOCD guidelines.

I hope all meets with OCD approval but if you have any questions, please don't hesitate to call.

Sincerely,

A handwritten signature in cursive script that reads "Lennah Frost".

Lennah Frost

Sr. Environmental Engineer

cc: Chris Williams - Hobbs

EOTT ENERGY Pipeline Limited Partnership

P.O. BOX 1660
5805 E. BUSINESS 20
MIDLAND, TEXAS 79702
(915) 682-3761

September 16, 1999

State of New Mexico
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505
Attn: William Olson

**RE: UL G, Sec. 20, T-20-S, R-37-E
LEA CO., NM**

Dear Mr. Olson:

As per our conversation, please be advised that on Wednesday, September 15, 1999, a contractor of EOTT Energy encountered groundwater while excavating a leaksite the above captioned location.

At this time there appears to be no free phase but probably dissolved phase separated hydrocarbons. The site is being excavated to clean up the source of the contamination.

I hope all meets with OCD approval but if you have any questions, please don't hesitate to call me at 914/684-3467.

Sincerely,



Lennah Frost
Sr. Environmental Engineer

cc: Environmental File

District I
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2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Form C-141
Revised March 17, 1999

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company EOTT Energy Pipeline Limited Partnership	Contact Lennah Frost
Address P.O. Box 1660, Midland, TX 79702	Telephone No. 915/684-3467
Facility Name Pearl Queen 6" gathering	Facility Type 6" gathering line

Surface Owner State of New Mexico	Mineral Owner	Lease No.
---------------------------------------------	---------------	-----------

LOCATION OF RELEASE

Unit Letter G	Section 20	Township 20-S	Range 37-E	Feet from the	North/South Line	Feet from the	East/West Line	County Lea
-------------------------	----------------------	-------------------------	----------------------	---------------	------------------	---------------	----------------	----------------------

CORRECTED NATURE OF RELEASE

Type of Release Crude Oil	Volume of Release 15 barrels	Volume Recovered 8 bbls
Source of Release Pipeline release	Date and Hour of Occurrence 9/8/99 - 12 pm	Date and Hour of Discovery 9/8/99 - same
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Sylvia - Hobbs District Office	
By Whom? Lennah Frost	Date and Hour 9/8/99 - 2:30 pm	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

~~connection between the two pipelines~~ *pipeline corrosion*

Describe Area Affected and Cleanup Action Taken.*

Groundwater was encountered on 9/15/99. Free phase hydrocarbons formed on pool after a couple of days. All of the contaminated soil will be excavated to remove source of groundwater contamination.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: <i>Lennah Frost</i>	OIL CONSERVATION DIVISION	
Printed Name: Lennah Frost	Approved by District Supervisor:	
Title: Sr. Environmental Engineer	Approval Date:	Expiration Date:
Date: 2/1670 Phone: 915/684-3467	Conditions of Approval:	Attached <input type="checkbox"/>

* Attach Additional Sheets If Necessary



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

February 4, 2000

CERTIFIED MAIL

RETURN RECEIPT NO: Z-559-572-896

Ms. Lennah Frost
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
Midland, Texas 79702

RE: PEARL QUEEN 6" GATHERING LINE

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) December 10, 1999 "UL G - SEC 20, T-20-S, R-37-E, PEARL QUEEN 6" GATHERING LINE". This document contains the results of EOTT's investigation and remediation of soil contamination related to a crude oil pipeline spill at the Pearl Queen 6" Gathering Line site located in Unit G, Section 20, Township 20 South, Range 37 East, Lea County, New Mexico.

The soil remediation actions taken to date are satisfactory. However, the OCD has the following comments and requirements regarding the above referenced document:

1. The OCD observed oil on the ground water during inspections of the site. Neither the cover letter nor the accompanying C-141 spill reports contain any information on the discovery of oil on ground water when excavating contaminated soils at the site. OCD Rule 116 requires verbal and written notification of these types of incidents. While EOTT provided verbal notification of the discovery, the subsequent written notification omits this information. The OCD requires that EOTT submit an amended C-141 form which includes information on the discovery of oil on ground water. The OCD also requires that all future C-141 reports include information on such discoveries as required by OCD Rule 116.
2. Your correspondence states that a ground water sample from the excavation showed that the water quality meets New Mexico Water Quality Control Commission (WQCC) standards. However, the attached analyses show that ground water quality in the excavation is in excess of WQCC standards. Due to the presence of oil in the excavation and the fact that water quality is contaminated in excess of WQCC standards, the OCD requires that EOTT submit a work plan to determine the extent of ground water contamination at the site.

3. Your correspondence states that the soil remediation successfully remediated soils to the OCD's benzene, toluene, ethylbenzene, xylene (BTEX) and total petroleum hydrocarbon (TPH) guidance levels. The information provided only contains the results of the TPH analyses. Please submit the results of the soil BTEX analyses.

The OCD requires that EOTT submit the above information to the OCD Santa Fe Office by March 10, 2000 with a copy provided to the OCD Hobbs District Office.

If you have any questions or comments, please contact me at (505) 827-7154.

Sincerely,



William C. Olson

Hydrologist

Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office

EOTT ENERGY Pipeline Limited Partnership

P.O. BOX 1660
5805 E. BUSINESS 20
MIDLAND, TEXAS 79702
(915) 682-3761

December 10, 1999

State of New Mexico
Oil Conservation Division - Hobbs District Office
1625 N. French Dr.
Hobbs, NM 88240
Attn: Donna Williams

RECEIVED

DEC 16 1999

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

RE: UL G - Sec. 20, T-20-S, R-37-E
Pearl Queen 6" gathering line

Dear Ms. Williams:

Attached please find the final C-141 for the above captioned spill. Approximately 7500 cubic yards of crude oil contaminated soil was removed and disposed of at J&L Landfarm. Using the NMOCD Guidelines for Leaks, Spills and Releases, EOTT has successfully reached TPH, BTEX and Benzene levels of <100 ppm, <50 ppm and < 10 ppm, respectively (analysis attached).

At the time EOTT took the last soil sample, a water sample was also taken from the bottom of the site. This sample meets WCQQ guidelines for BTEX (analysis attached).

Based on the attached laboratory analysis EOTT proposes closure on soil and groundwater at the site. I hope all meets with OCD approval but if you have any questions, please don't hesitate to call.

Sincerely,



Lennah Frost
Sr. Environmental Engineer

cc: Leon Anderson - State Land Office - Hobbs
Mike Matush - State Land Office - Santa Fe

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Form C-141
Revised March 17, 1999

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company EOTT Energy Pipeline Limited Partnership	Contact Lennah Frost
Address P.O. Box 1660, Midland, TX 79702	Telephone No. 915/684-3467
Facility Name Pearl Queen 6" gathering	Facility Type 6" gathering line
Surface Owner State of New Mexico	Mineral Owner Royalties have been paid
Lease No.	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
G	20	20-S	37-E					Lea

NATURE OF RELEASE

Type of Release Crude oil	Volume of Release 15 bbls	Volume Recovered 8 bbls
Source of Release Pipeline leak	Date and Hour of Occurrence 9/8/99 - 12 pm	Date and Hour of Discovery 9/8/99- same
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Sylvia - Hobbs District Office	
By Whom? Lennah Frost	Date and Hour 9/8/99 - 2:30 pm	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	
If a Watercourse was Impacted, Describe Fully.*		
Describe Cause of Problem and Remedial Action Taken.* Pipeline corrosion. Pipe was repaired.		
Describe Area Affected and Cleanup Action Taken.* Approximately 7500 cubic yards of contaminated soil was excavated and disposed of at J&L Landfarm. Clean soil was used for backfill. Analysis of water and soil from bottom hole and soil from the side walls were taken on 12/6/99 1/11/99. Analysis attached		

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature 	OIL CONSERVATION DIVISION	
Printed Name: Lennah Frost	Approved by District Supervisor:	
Title: Sr. Environmental Engineer	Approval Date:	Expiration Date:
Date: 12/10/99 Phone: 915/684-3467	Conditions of Approval:	Attached <input type="checkbox"/>

* Attach Additional Sheets If Necessary

gpl

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT ENERGY
ATTN: MR. FRANK HERNANDEZ
P.O. BOX 1660
MIDLAND, TEXAS 79703
FAX: 505-392-2946
FAX: 915-687-2713 (Lennah Frost)

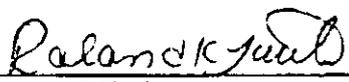
Sample Type: Water
Sample Condition: Intact/Iced
Project #: Pearl Queen
Project Name: None Given
Project Location: South of Monument

Sampling Date: 12/06/99
Receiving Date: 12/06/99
Analysis Date: 12/06/99

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
22015	Water North	0.012	0.012	0.004	0.011	0.022
22016	Water South	0.011	0.012	0.004	0.009	0.021

% IA	104	101	102	104	102
% EA	97	92	95	98	96
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8021B,5030


Raland K. Tuttle

12-7-99
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

EOTT ENERGY
ATTN: MR. FRANK HERNANDEZ
P.O. BOX 1660
MIDLAND, TEXAS 79703
FAX: 505-392-2946
FAX: 915-687-2713 (Lennah Frost)

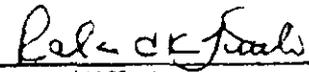
Sample Type: Soil
Sample Condition: Intact/loosd
Project #: Pearl Queen
Project Name: None Given
Project Location: South of Monument

Sampling Date: 12/06/99
Receiving Date: 12/06/99
Analysis Date: 12/06/99

ELT#	FIELD CODE	GRO	DRO
		C6-C10 mg/kg	>C10-C25 mg/kg
22013	East Wall North	<10	<10
22014	East Wall South	<10	<10

% INSTRUMENT ACCURACY	109	92
% EXTRACTION ACCURACY	112	82
BLANK	<10	<10

Methods: EPA SW 846-8015M GRO/DRO


Raland K. Tuttle

12-7-99
Date

District II - (505) 744-1243
 811 South First
 Artesia, NM 88210
 District III - (505) 334-6178
 1000 Rio Brazos Road
 Artesia, NM 87410
 District IV - (505) 827-7131

Oil Conservation Division
 2040 South Pacheco Street
 Santa Fe, New Mexico 87505
 (505) 827-7131

Submit 2 copies to
 Appropriate District
 Office in accordance
 with Rule 116 on
 back side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name EO TT Energy Pipeline	Contact Lennah Frost
Address PO Box 1660 Midland TX 74702	Telephone No. 915/6843467
Facility Name Pearl Queen Gathering	Facility Type
Surface Owner State of NM	Mineral Owner
	Lease No.

LOCATION OF RELEASE

Line Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
	20	20S	37E					Lea

NATURE OF RELEASE

Type of Release Crude oil	Volume of Release 15 bbls	Volume Recovered 8 bbls
Source of Release Pipe Line Leak	Date and Hour of Occurrence 9/8/99 12 pm	Date and Hour of Discovery Same
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Sylvia	
By Whom? Lennah Frost	Date and Hour 9/8/99 - 2:30	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse	

If a Watercourse was impacted, Describe Fully (Attach Additional Sheets If Necessary)

Describe Cause of Problem and Remedial Action Taken (Attach Additional Sheets If Necessary)

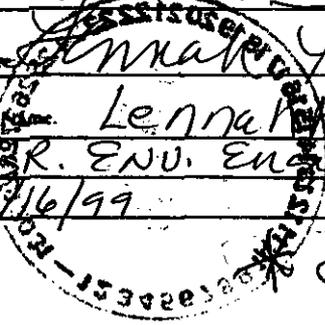
Corrosion Leak. Pipe was clamped - will be repaired ASAP.

Describe Area Affected and Cleanup Action Taken (Attach Additional Sheets If Necessary)

Oil pooled @ Leak source. Due to heavy Rain, oil ran down Row approx. 300' x 2'. All contaminated soil is being excavated & disposed of at J&L Landfarm.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature Lennah Frost	OIL CONSERVATION DIVISION		
Printed Name Lennah Frost	Approved by District Supervisor:	Approval Date:	Expiration Date:
Title SR. ENV. Engineer	Conditions of Approval:	Attached <input type="checkbox"/>	
Date 9/16/99	Phone 915/6843467		



Sent to Santa Fe on 11-22-99 - They impacted gnd. H2O on 9-15-99

MEMORANDUM OF MEETING OR CONVERSATION

Telephone Personal

Time 1320

Date 9/19/00

Originating Party

Other Parties

Pet McCasland - Environmental Plus Bill Olson - Envir. Bureau

Subject

FOTT - Pearl Queen Monitor Well

Discussion

Reviewed 9/15/00 fax
Monitor well located too far from source area

Conclusions or Agreements

They will place monitor well on right outside of excavated area on middle of south side

Distribution

Signed

Bill Olson

P.O. Box 1558
1324 North Man
Eunice New Mexico 88231
Telephone 505.394.3481
FAX 505 394 2601

ENVIRONMENTAL PLUS, INC.

Mobile Telephone #
Ben Miller 505 390 0288
Pat McCasland 505.390.7864
Roger Boone 505.390 2725

Micro-Blaze



To: Mr. Bill Olson From: Pat McCasland

Fax: 505-827-8177 Pages: 4

Phone: _____ Date: 9.15.00

Re: _____ CC: _____

- Urgent For Review Please Comment Please Reply Please Recycle

• Comments:

Bill,
Here is the propose MW placement at the
EDTT Pearl Queen 6" site. With your consensus
we will procede to install.

Pat McCasland



ENVIRONMENTAL PLUS, INC.
STATE APPROVED LAND REPAIR AND ENVIRONMENTAL SERVICES

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September 15, 2000

Mr. William C. Olson
New Mexico Oil Conservation Division
Environmental Bureau
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Subject: E.O.T.T. Pearl Queen 6" Gathering Line Monitor Well Placement

Dear Mr. Olson,

Environmental Plus, Inc. has been engaged by E.O.T.T. Energy Pipeline to install a monitor well at the above referenced location in Lea County approximately 9 miles south of Monument, New Mexico. In your letter dated May 24, 2000, E.O.T.T. is directed to install a monitor well "outside of and directly downgradient of the excavated area to demonstrate that contaminated ground water has not migrated from the spill site."

Attached for reference is a portion of the Ground Water Map of Lea County from the USGS Report #6, Nicholson & Clebsch 1961 indicating the ground water gradient and a detailed site map of the E.O.T.T. Pearl Queen 6" Gathering Line Remediation Site showing the proposed placement of the monitor well. It is proposed to install the well approximately 150' southwest and directly downgradient of the excavation. Please convey your concurrence or alternative location as soon as possible.

If you have any questions please call me at the office or at 505.390.7864.

Sincerely,

Pat McCasland
EPI Technical Manager

Cc: Glenn Waldrop, EOTT
Frank Hernandez, EOTT
Sherry Miller, EPI

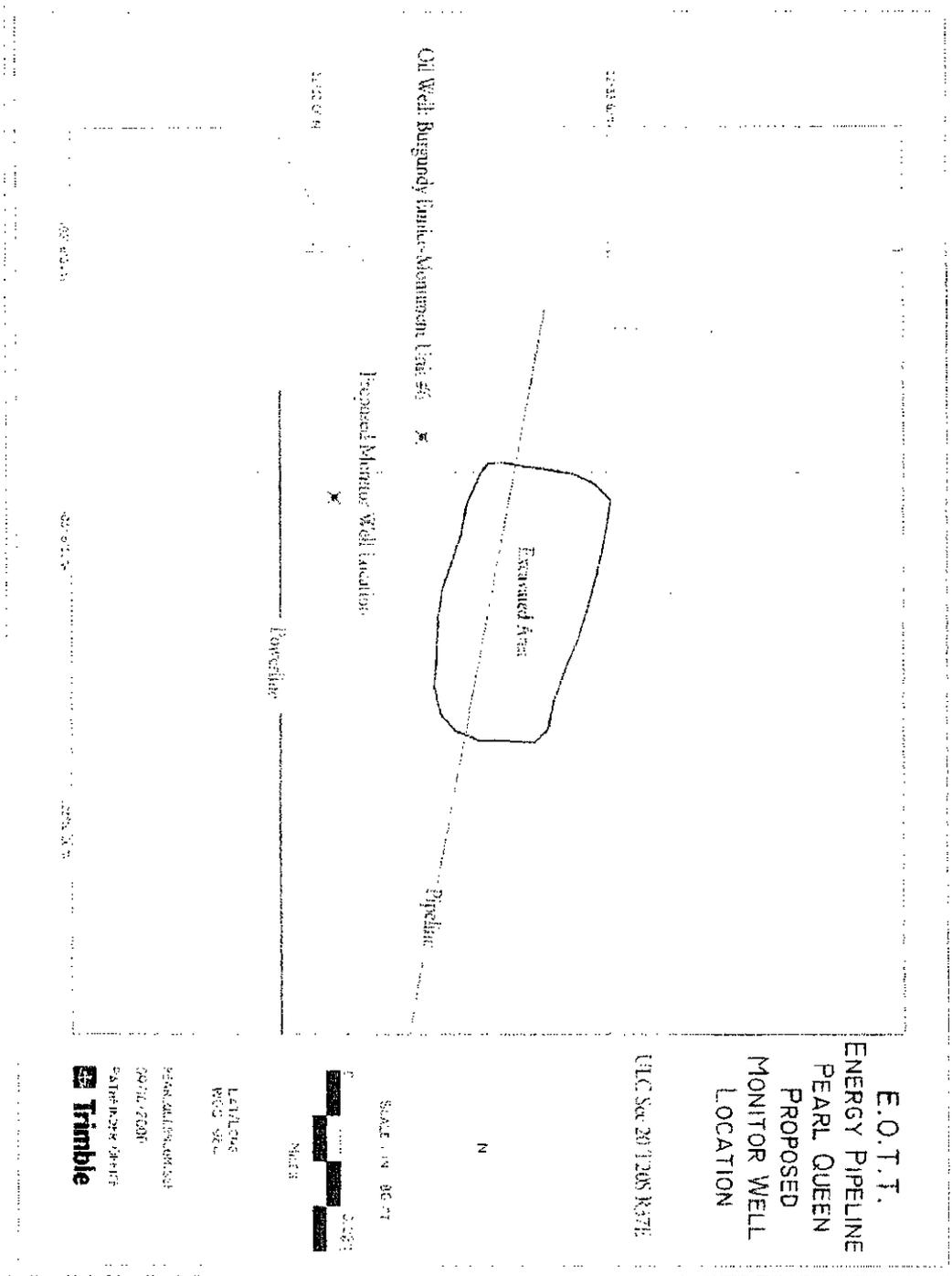
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STATE APPROVED LAND USE AND ENVIRONMENTAL SERVICES

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ENVIRONMENTAL PLUS, INC.



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

May 24, 2000

CERTIFIED MAIL

RETURN RECEIPT NO: 5051-3204

Mr. Glen Waldrop
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
Midland, Texas 79702

RE: PEARL QUEEN 6" GATHERING LINE

Dear Mr. Waldrop:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) February 16, 2000 "PEARL QUEEN 6" GATHERING LINE, LEA COUNTY, NEW MEXICO". This document contains additional information regarding EOTT's investigation and remediation of soil contamination related to a crude oil pipeline spill at the Pearl Queen 6" Gathering Line site located in Unit G, Section 20, Township 20 South, Range 37 East, Lea County, New Mexico. The document also contains a proposal to install a monitor well to determine any impacts on ground water.

The above referenced proposal is approved with the following conditions:

1. EOTT shall install the monitor well outside of and directly downgradient of the excavated area to demonstrate that contaminated ground water has not migrated from the spill site.
2. EOTT shall complete the monitor well as follows:
 - a. At least 15 feet of well screen shall be placed across the water table interface with 5 feet of the well screen above the water table and 10 feet of the well screen below the water table.
 - b. An appropriately sized gravel pack shall be set in the annulus around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.
 - c. A 2-3 foot bentonite plug shall be placed above the gravel pack.
 - d. The remainder of the hole shall be grouted to the surface with cement containing 3-5% bentonite.

- e. A concrete pad and locking well cover shall be placed around the well at the surface.
 - f. The well shall be developed after construction using EPA approved procedures.
3. No less than 24 hours after the well is developed, ground water from the monitor well shall be purged, sampled and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene and polycyclic aromatic hydrocarbons (PAH) using EPA approved methods and quality assurance/quality control (QA/QC) procedures.
4. All wastes generated shall be disposed of at an OCD approved facility.
5. EOTT shall submit a comprehensive report on all investigation and remediation actions which have occurred at the site. The report shall be submitted to the OCD Santa Fe Office by July 31, 2000 with a copy provided to the OCD Hobbs District Office and shall include:
- a. A description of all investigation, remediation and monitoring activities which have occurred including conclusions and recommendations.
 - b. A geologic/lithologic log and well completion diagram for each monitor well.
 - c. Maps showing the location of the spills, excavated areas, monitor wells and any other pertinent site features as well as the direction and magnitude of the hydraulic gradient.
 - c. Summary tables of all soil ground water quality sampling results and copies of all laboratory analytical data sheets and associated QA/QC.
 - d. The disposition of all wastes generated.

Please be advised that OCD approval does not limit EOTT to the proposed work plan should the investigation actions fail to adequately define the extent of contamination related to EOTT's activities, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and regulations. If you have any questions, please contact me at (505) 827-7154.

Sincerely,



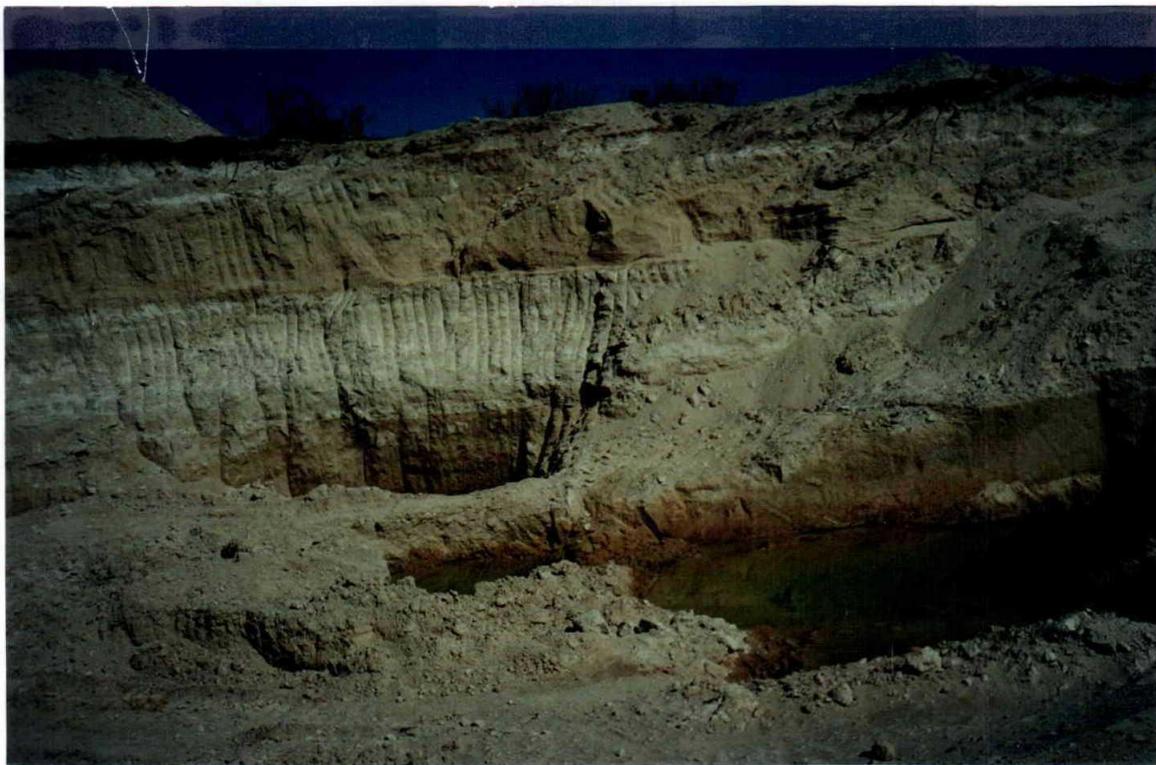
William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office

EOTT/PEARL QUEEN: ULC-SEC 20-Ts20S-R37E
taken by Donna Williams 09-15-1999



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taken by Donna Williams 09-15-1999



EOTT/PEARL QUEEN: SEC 20-T20S-R37E

(NEXT TO BURGUNDY'S WELL NO 6.)

taken by DONNA WILLIAMS ON 10-25-99



EOTT/PEARL QUEEN: SEC 20-T20S-R37E
(NEXT TO BURGUNDY'S WELL NO 6.)
taken by DONNA WILLIAMS ON 10-25-99



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