

AP-076

Annual Report

**DATE:
2010**



January 13, 2010

Mr. Glenn von Gonten
New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**RE: Annual Report for the South Four Lakes #13 Site (AP-76)
T12S-R34E-Section 1, Unit Letter L, Lea County, New Mexico**

Dear Glenn:

As agent for Pride Energy Company (Pride), Trident Environmental submits this Annual Report to update the New Mexico Oil Conservation Division (NMOCD) of activities and ongoing investigations at the above referenced site. Below is a chronological list of site activity.

December 10, 2007	Revised C-144 pit closure form approved by NMOCD (Elke Environmental)
January 23, 2008	Pit closure completed in accordance with NMOCD-approved C-144 (drilling pit contents solidified, encapsulated with plastic liner, and buried by Elke Env.)
January 22-23, 2008	Initial soil and groundwater sampling activities (Elke Environmental)
January 30, 2008	C-141 release notification form submitted (Elke Environmental)
February 12, 2008	NMOCD requires submission of Abatement Plan (AP-78)
April 14, 2008	Stage 1 Abatement Plan submitted to NMOCD
May 30, 2008	Soil boring program initiated to define vertical and horizontal extent of impairment to groundwater (B-1, B-2, B-3, MW-1, and MW-2)
June 4-5, 2008	
November 26, 2008	Stage 2 Abatement Plan submitted to NMOCD
March 6, 2009	Stage 1 Abatement Plan administratively approved by NMOCD
March 20, 2009	Written notice for Stage 1 Abatement Plan sent to interested parties
March 24, 2009	Public notice for Stage 1 Abatement Plan published.
April 23, 2009	End of public notice period for Stage 1 Abatement Plan

The Stage 1 Abatement Plan is pending NMOCD approval (public notice period ended). Based on the findings of soil and groundwater investigations proposed in the Stage 1 Abatement Plan, the following proposed work elements were included in the Stage 2 Abatement Plan:

- Continue groundwater monitoring and updating of the fate and transport model to support the efficacy of natural attenuation as the preferred abatement option
- Submission of an annual report with a recommendation for either
 1. Closure of the regulatory file if the results of the fate and transport modeling continue to support a natural attenuation remedy, such that chloride concentrations are less than 250 mg/L after a 30 year period (year 2039), or less than 500 mg/L after a 20 year period (year 2029), or
 2. Implementation of a pump-and-use groundwater restoration strategy if the results of the fate and transport modeling do not support a natural attenuation remedy
- Construction of an infiltration barrier (drilling pit closure plan)

The Stage 2 Abatement Plan is pending NMOCD administrative approval and public notice requirements.

Groundwater Monitoring Results

Groundwater monitoring activities have been performed at the site on a quarterly basis since January 2008 as summarized in Table 1 below. A site plan showing the most recent groundwater elevation and the chloride/TDS concentrations in monitoring wells MW-1 and MW-2 is shown in Figure 1. Figure 2 is a graph depicting chloride and TDS concentrations and groundwater elevation versus time.

Table 1: Summary of Groundwater Monitoring Results

Monitoring Well	Sample Date	Depth to Groundwater (feet BTOC)	Groundwater Elevation (feet AMSL)	Chloride (mg/L)	TDS (mg/L)	BTEX (mg/L)
MW-1	01/23/08	27.5	4116.22	1,330	NA	<0.003
	03/13/08	27.63	4116.09	665	1,461	<0.003
	06/19/08	27.88	4115.84	736	1,560	<0.003
	09/09/08	28.05	4115.67	760	1,790	<0.003
	12/08/08	28.11	4115.61	710	1,720	<0.003
	03/18/09	28.28	4115.44	750	1,770	<0.003
	06/17/09	28.46	4115.26	760	1830	<0.003
	09/21/09	28.49	4115.23	1040	2220	<0.003
	12/11/09	28.55	4115.17	820	1930	<0.003
MW-2	06/19/08	27.54	4115.71	320	976	<0.003
	09/09/08	27.71	4115.54	172	848	<0.003
	12/08/08	27.80	4115.45	164	732	<0.003
	03/18/09	27.95	4115.30	168	720	<0.003
	06/17/09	28.19	4115.06	188	769	<0.003
	09/21/09	28.15	4115.10	240	747	<0.003
	12/11/09	28.21	4115.04	220	866	<0.003

*Total Dissolved Solids (TDS), chloride, sulfate, and BTEX concentrations listed in milligrams per liter (mg/L).
Values in boldface type indicate concentrations exceed WQCC standards.
BTOC - Below Top of Casing; AMSL - Above Mean Sea Level
NA Indicates parameter was not analyzed for this constituent.*

Chloride and TDS concentrations at monitoring well MW-1 are above the New Mexico's Water Quality Control Commission (WQCC) standards, of 250 mg/L and 1,000 mg/L, respectively. However, horizontal dispersion of the chloride and TDS in groundwater does not extend beyond approximately 75 to 100 feet downgradient (southeast) of the southeast corner of the pit as evidenced by the results of monitoring well MW-2 where background chloride and TDS levels are observed in groundwater.

Benzene, toluene, ethylbenzene, and xylenes (BTEX) concentrations have been below laboratory detection limits and WQCC standards during the past two years; therefore, analysis for these constituents will be suspended, unless directed otherwise by the NMOCD. Quarterly ground water sampling and monitoring will continue.

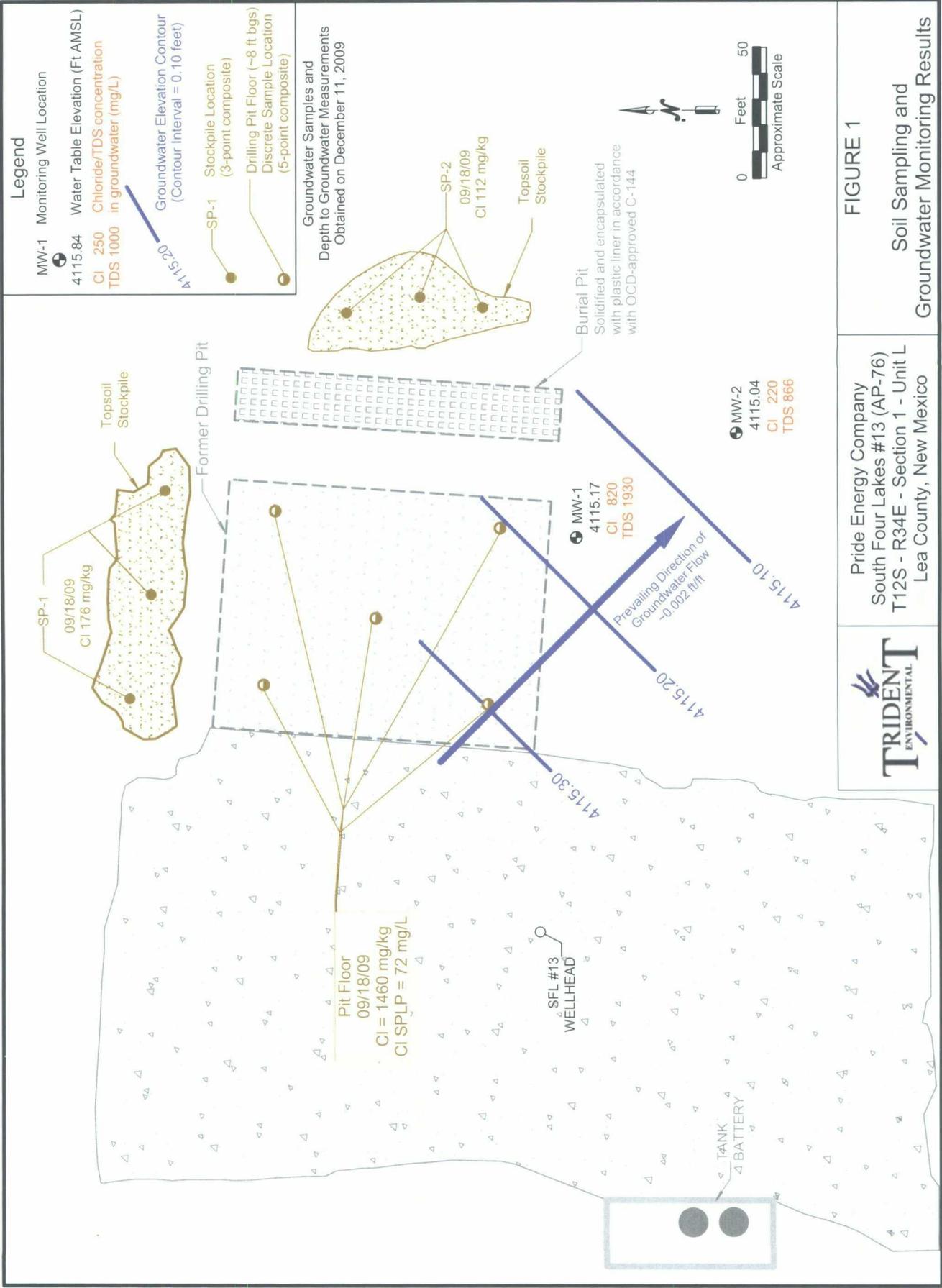


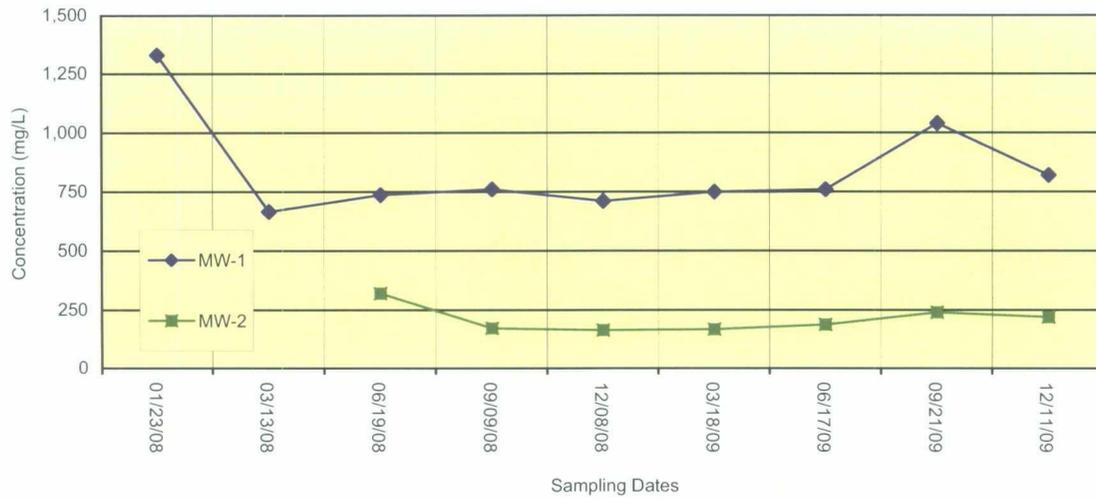
FIGURE 1

Pride Energy Company
 South Four Lakes #13 (AP-76)
 T12S - R34E - Section 1 - Unit L
 Lea County, New Mexico

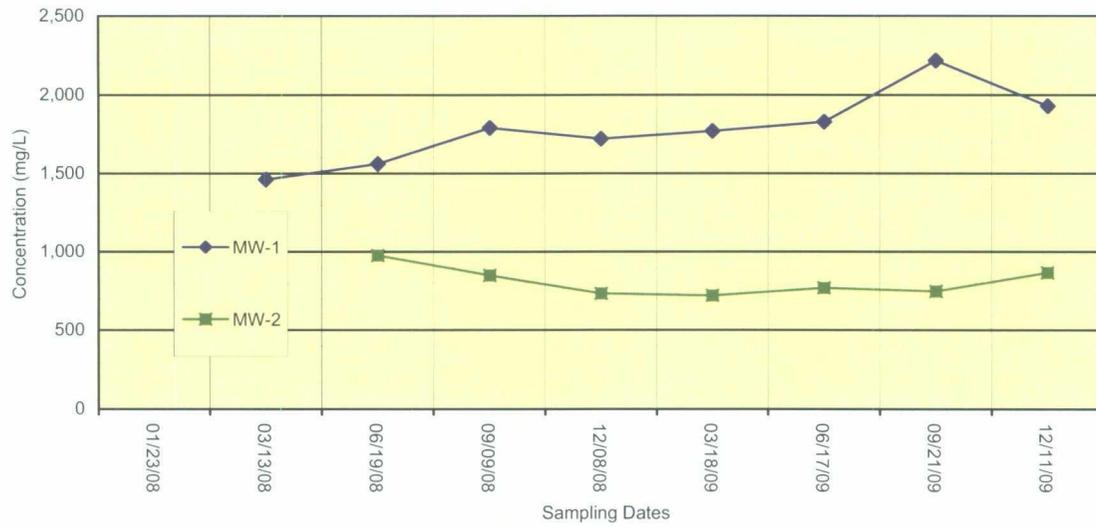
TRIDENT ENVIRONMENTAL

Soil Sampling and Groundwater Monitoring Results

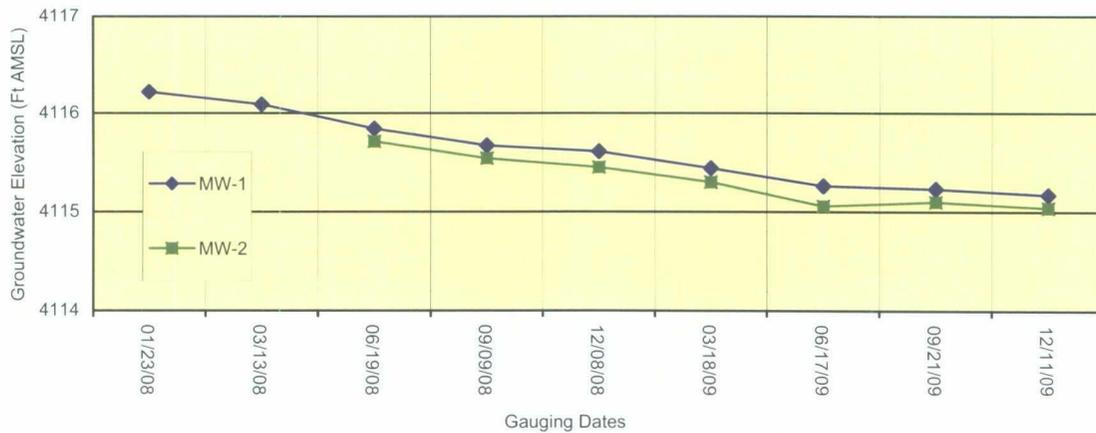
Chloride Concentrations Versus Time Graph



TDS Concentrations Versus Time Graph



Groundwater Elevations Versus Time Graph



Drilling Pit Excavation Closure Plan

To further prepare for implementation of the vadose zone remedy, as proposed in the Stage 2 Abatement Plan, a 5-point composite soil sample was collected on September 18, 2009 from the floor of the drilling pit (7 feet below ground surface) for analysis of chloride concentrations. Chloride concentration at the drilling pit floor is 1,460 mg/kg (method 4500-Cl-B) and 72 mg/L (method SPLP 1312/4500-Cl-B).

To confirm the suitability of stockpiled soil to be used as backfill material for the proposed vadose zone remedy, 3-point composite soil samples of the two existing stockpiles were also collected and analyzed for chloride content. The chloride concentrations in soil pile SP-1 (176 mg/kg) and SP-2 (112 mg/kg) are at background concentrations and will support revegetation efforts. Soil from the drilling pit floor, mixed with stockpiled soil to reduce the chloride concentration, then capped with an infiltration barrier, will effectively abate any threat to ground water.

We look forward to working with you on this project. If you have any questions please call me at 432-638-8740 or Matt Pride at 918-524-9200.

Sincerely,



Gilbert Van Deventer, REM, PG
Trident Environmental

cc: Matt Pride (Pride Energy Co., Tulsa, OK)
Larry Hill (NMOCD -District 1, Hobbs, NM)

Attachments: *Laboratory analytical reports and chain of custody documentation*

ATTACHMENT A

Laboratory Analytical Reports

And

Chain of Custody Documentation



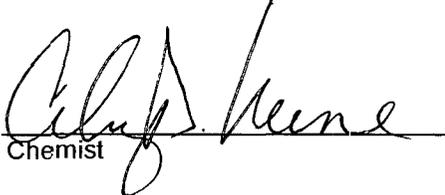
ANALYTICAL RESULTS FOR
 TRIDENT ENVIRONMENTAL
 ATTN: GIL VAN DEVENTER
 P.O. BOX 7624
 MIDLAND, TX 79708-7624
 FAX TO: (413) 403-9968

Receiving Date: 12/16/09 Sampling Date: 12/11/09
 Reporting Date: 12/18/09 Sample Type: WATER
 Project Number: SOUTH FOUR LAKE #13 Sample Condition: COOL & INTACT @ 1.5°C
 Project Name: PRIDE ENERY COMPANY Sample Received By: CK
 Project Location: T12S-R34E-SEC1 UNIT LETTER L ~ Analyzed By: ZL
 LEA COUNTY - NM

LAB NUMBER	SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE		12/17/09	12/17/09	12/17/09	12/17/09
H18891-1	MW-1	<0.001	<0.001	<0.001	<0.003
H18891-2	MW-2	<0.001	<0.001	<0.001	<0.003
Quality Control		0.050	0.047	0.047	0.144
True Value QC		0.050	0.050	0.050	0.150
% Recovery		100	94.0	94.0	96.0
Relative Percent Difference		6.9	8.3	7.5	8.2

METHOD: EPA SW-846 8021 B

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE, AND TOTAL XYLENES.


 Chemist

12/22/09
 Date

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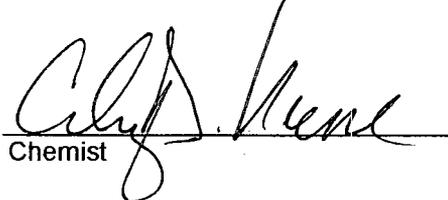
ANALYTICAL RESULTS FOR
TRIDENT ENVIRONMENTAL
ATTN: GIL VAN DEVENTER
P.O. BOX 7624
MIDLAND, TX 79708-7624
FAX TO: (413) 403-9968

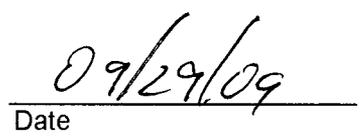
Receiving Date: 09/24/09	Sampling Date: 09/21/09
Reporting Date: 09/28/09	Sample Type: WATER
Project Number: SOUTH FOUR LAKES #13	Sample Condition: COOL & INTACT @ 1.5°C
Project Name: PRIDE ENERY COMPANY	Sample Received By: ML
Project Location: T12S-R34E-SEC1 UNIT LETTER L ~ LEA COUNTY - NM	Analyzed By: ZL/CK

LAB NUMBER	SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE		09/24/09	09/24/09	09/24/09	09/24/09
H18306-1	MW-1	<0.001	<0.001	<0.001	<0.003
H18306-2	MW-2	<0.001	<0.001	<0.001	<0.003
Quality Control		0.049	0.046	0.049	0.161
True Value QC		0.050	0.050	0.050	0.150
% Recovery		98.0	92.0	98.0	107
Relative Percent Difference		1.2	0.9	1.4	1.2

METHOD: EPA SW-846 8021 B

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE, AND TOTAL XYLENES.


Chemist


Date

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Cardinal Laboratories, Inc.

101 East Martand - Hobbs, New Mexico 88240
 Tel (575) 393-2326
 Fax (575) 393-2476

Company Name: Trident Environmental
Project Manager: Gil Van Deventer / Trident Environmental
Address: (Street, City, Zip) P. O. Box 7624 ~ Midland, Texas 79708-7624
Phone #: (432) 638-8740
Fax #: (413) 403-9968

BILL TO Company: Pride Energy Company / Matt Pride
Address: (Street, City, Zip) P. O. Box 710950 ~ Tulsa, OK 74170-1950
Phone #: (918) 524-9200
Fax #: (918) 524-9292

Project Name: South Four Lakes #13

Project Location: T12S-R34E-Sec1 Unit Letter L ~ Lea County - New Mexico
Sampler Signature: Rozanne Johnson (575) 631-9310
Sampler Email: rozanne@valornet.com

LAB # (LAB USE ONLY)	FIELD CODE	(G)rab or (C)omp	# CONTAINERS	WATER	SOIL	AIR	SLUDGE	HCL (2.40ml VOA)	HNO ₃	NaHSO ₄	H ₂ SO ₄	ICE (1-litler HDPE)	PRESERVATIVE METHOD		DATE (2009)	TIME
													METHOD	SAMPLING		
H18306-1	MW-1	G	3	X				2					1	NONE	9-21	14:05
-2	MW-2	G	3	X				2					1	NONE	9-21	13:10

Relinquished by: Rozanne Johnson
Date: 9-24-2009
Time: 11:20

Received by: [Signature]
Date: 9/24/09
Time: 11:21

Relinquished by: [Signature]
Date: [Blank]
Time: [Blank]

Received by: (Laboratory Staff)
Date: [Blank]
Time: [Blank]

Delivered By: (Circle One) Sampler - UPS - Bus - Other:
Sample Condition: Cool Yes No
 Intact Yes No
Checked By: [Signature]
 (Initials)

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

LAB Order ID # _____

ANALYSIS REQUEST

(Circle or Specify Method No.)

Method No.	Method Name	Yes	No
TPH 418.1/TX1005 / TX1005 Extended (C35)			
PAH 8270C			
Total Metals Ag As Ba Cd Cr Pb Se Hg 6010B/200.7			
TCLP Metals Ag As Ba Cd Cr Pb Se Hg			
TCLP Volatiles			
TCLP Semi Volatiles			
TCLP Pesticides			
RCI			
GC/MS Vol. 8260B/624			
GC/MS Semi. Vol. 8270C/625			
PCBs 8082/608			
Pesticides 8081A/608			
BOD, TSS, pH			
Moisture Content			
Anions (Cl, SO ₄ , CO ₃ , HCO ₃)			
Cations (Ca, Mg, Na, K)			
Sulfates			
Total Dissolved Solids (160.1 / SM2540C)			
Chlorides (325.3 / SM4500 B)			
Turn Around Time ~ 24 Hours			

REMARKS:

Phone Results: Yes No

Fax Results: Yes No

Additional Fax Number: _____

Email Results to:
 gil@trident-environmental.com
 mattp@pride-energy.com
 rozanne@valornet.com



ANALYTICAL RESULTS FOR
 TRIDENT ENVIRONMENTAL
 ATTN: GIL VAN DEVENTER
 P.O. BOX 7624
 MIDLAND, TX 79708-7624
 FAX TO: (413) 403-9968

Receiving Date: 06/18/09
 Reporting Date: 06/23/09
 Project Number: SOUTH FOUR LAKES #13
 Project Name: PRIDE ENERY COMPANY
 Project Location: T12S-R34E-SEC1 UNIT LETTER L
 LEA COUNTY, NM

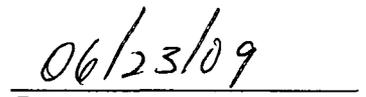
Sampling Date: 06/17/09
 Sample Type: WATER
 Sample Condition: COOL & INTACT
 @ 5°C
 Sample Received By: AB
 Analyzed By: ZL

LAB NUMBER	SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE		06/22/09	06/22/09	06/22/09	06/22/09
H17659-1	MW-1	<0.001	<0.001	<0.001	<0.003
H17659-2	MW-2	<0.001	<0.001	<0.001	<0.003
Quality Control		0.047	0.046	0.046	0.137
True Value QC		0.050	0.050	0.050	0.150
% Recovery		94.0	92.0	92.0	91.3
Relative Percent Difference		<1.0	<1.0	<1.0	<1.0

METHOD: EPA SW-846 8021 B

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE,
 AND TOTAL XYLENES.


 Chemist


 Date



ANALYTICAL RESULTS FOR
 TRIDENT ENVIRONMENTAL
 ATTN: GIL VAN DEVENTER
 P.O. BOX 7624
 MIDLAND, TEXAS 79708-7624
 FAX TO: (413) 403-9968

Receiving Date: 03/19/09
 Reporting Date: 03/23/09
 Project Number: SOUTH FOUR LAKES #13
 Project Name: PRIDE ENERGY COMPANY
 Project Location: T12S-R34E-SEC1 UNIT LETTER L
 LEA CO., NM

Sampling Date: 03/18/09
 Sample Type: WATER
 Sample Condition: COOL & INTACT
 Sample Received By: ML
 Analyzed By: HM/TR

LAB NUMBE SAMPLE ID	Na (mg/L)	Ca (mg/L)	Mg (mg/L)	K (mg/L)	Conductivity (uS/cm)	T-Alkalinity (mgCaCO ₃ /L)
ANALYSIS DATE:	03/23/09	03/20/09	03/23/09	03/20/09	03/20/09	03/20/09
H17094-1 MW-1	445	152	14.6	3.8	2,660	168
H17094-2 MW-2	108	120	4.9	2.5	1,040	160
Quality Control	NR	48.1	51.0	2.76	1,441	NR
True Value QC	NR	50.0	102	3.00	1,413	NR
% Recovery	NR	96.2	92.4	91.9	102	NR
Relative Percent Difference	NR	<0.1	<0.1	2.9	1.0	NR

METHODS:	SM3500-Ca-D	3500-Mg E	8049	120.1	310.1
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	Cl (mg/L)	SO ₄ (mg/L)	CO ₃ (mg/L)	HCO ₃ (mg/L)	pH (s.u.)	TDS (mg/L)
ANALYSIS DATE:	03/20/09	03/20/09	03/20/09	03/20/09	03/20/09	03/20/09
H17094-1 MW-1	750	181	0	205	7.94	1,770
H17094-2 MW-2	168	155	0	195	7.93	720
Quality Control	500	41.8	NR	976	7.03	NR
True Value QC	500	40.0	NR	1000	7.00	NR
% Recovery	100	105	NR	97.6	100	NR
Relative Percent Difference	< 0.1	4.7	NR	2.4	2.3	0.6

METHODS:	SM4500-Cl-B	375.4	310.1	310.1	150.1	160.1
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Gil Van Deventer
 Chemist

03/26/09
 Date

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 MIDLAND, TX 79708-7624
 FAX TO: (413) 403-9968

Receiving Date: 03/19/09
 Reporting Date: 03/23/09
 Project Number: SOUTH FOUR LAKES #13
 Project Name: PRIDE ENERGY COMPANY
 Project Location: T12S-R34E-SEC1 UNIT LETTER L
 ~ LEA CO., NM

Sampling Date: 03/18/09
 Sample Type: WATER
 Sample Condition: COOL & INTACT
 Sample Received By: ML
 Analyzed By: ZL

LAB NUMBER SAMPLE ID	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE	03/20/09	03/20/09	03/20/09	03/20/09
H17094-1 MW-1	<0.001	<0.001	<0.001	<0.003
H17094-2 MW-2	<0.001	<0.001	<0.001	<0.003
Quality Control	0.049	0.050	0.049	0.149
True Value QC	0.050	0.050	0.050	0.150
% Recovery	98.0	100	98.0	99.3
Relative Percent Difference	3.6	3.3	3.0	3.3

METHOD: EPA SW-846 8021 B

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE,
 AND TOTAL XYLENES.


 Chemist


 Date

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 ATTN: GIL VAN DEVENTER
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 MIDLAND, TX 79708-7624
 FAX TO: (413) 403-9968

Receiving Date: 09/24/09
 Reporting Date: 09/25/09
 Project Number: SOUTH FOUR LAKES #13
 Project Name: PRIDE ENERGY COMPANY
 Project Location: T12S, R34E, SEC 1, UNIT L,
 LEA COUNTY, NM

Analysis Date: 09/25/09
 Sampling Date: 09/18/09
 Sample Type: SOIL
 Sample Condition: COOL & INTACT @ 1.5°C
 Sample Received By: ML
 Analyzed By: HM

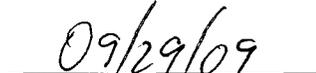
LAB NO.	SAMPLE ID	Cl ⁻ (mg/kg)
H18325-1	SP-1	176
H18325-2	SP-2	112
Quality Control		500
True Value QC		500
% Recovery		100
Relative Percent Difference		2.0

METHOD: Standard Methods 4500-Cl⁻B

Note: Analyses performed on 1:4 w:v aqueous extracts.



 Chemist



 Date

H18325 Trident Environmental

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 ATTN: GIL VAN DEVENTER
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Receiving Date: 09/24/09
 Reporting Date: 10/01/09
 Project Number: SOUTH FOUR LAKES #13
 Project Name: PRIDE ENERGY COMPANY
 Project Location: T12S, R34E, SEC 1, UNIT L,
 LEA COUNTY, NM

Analysis Date: 10/01/09
 Sampling Date: 09/18/09
 Sample Type: SOIL
 Sample Condition: COOL & INTACT @ 1.5°C
 Sample Received By: ML
 Analyzed By: HM

LAB NO.	SAMPLE ID	Cl ⁻ (mg/kg)
H18325-3	PIT FLOOR (7' BGS)	1,460
Quality Control		500
True Value QC		500
% Recovery		100
Relative Percent Difference		< 0.1

METHOD: Standard Methods	4500-Cl ⁻ B
--------------------------	------------------------

Note: Analysis performed on a 1:4 w:v aqueous extract.


 Chemist


 Date

H18325CI Trident Environmental

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ANALYTICAL RESULTS FOR
 TRIDENT ENVIRONMENTAL
 ATTN: GIL VAN DEVENTER
 P.O. BOX 7624
 MIDLAND, TX 79708-7624
 FAX TO: (413) 403-9968

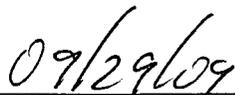
Receiving Date: 09/24/09
 Reporting Date: 09/29/09
 Project Number: SOUTH FOUR LAKES #13
 Project Name: PRIDE ENERGY COMPANY
 Project Location: T12S, R34E, SEC 1, UNIT L,
 LEA COUNTY, NM

Analysis Date: 09/29/09
 Sampling Date: 09/18/09
 Sample Type: SOIL
 Sample Condition: COOL & INTACT @ 1.5°C
 Sample Received By: ML
 Analyzed By: HM

LAB NO.	SAMPLE ID	SPLP Cl ⁻ (mg/L)
H18325-3	PIT FLOOR (7' BGS)	72
Quality Control		500
True Value QC		500
% Recovery		100
Relative Percent Difference		< 0.1

METHOD: Standard Methods	1312 / 4500-Cl ⁻ B
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 Chemist


 Date

H18325SPLP Trident Environmental

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