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# **REPORTS**

**DATE:**

2002

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**Closure Report**  
**March 4, 2002**

**Saga Petroleum**  
**Todd Lower San Andres Unit Pit**  
**Roosevelt County, New Mexico**

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## Closure Report

This closure report reflects the completion of cleanup activities as described in the May 29, 2001 letter and Plan of Action sent to Mr. Wayne Price, NMOCD.

On June 4, 2001 Allstate Environmental began excavation of the site using previously (May 4, 2001) submitted analyses as a guideline for removal of contaminated soil. The soil was stockpiled adjacent to the excavated area for convenience in the encapsulation process (using cement kiln dust).

Attachments illustrate sample points and analyses of soils in different areas of the pit site immediately prior to beginning the encapsulation process indicating that the bottom and sides of the pit area were well below the levels prescribed by the cleanup standards for unlined surface impoundments. Allstate Environmental used 650 tons of cement kiln dust to contain the contaminated soil, estimated to be approximately 4,800 cubic yards. Immediately after encapsulation, clean soil was brought in and the site was capped and re-vegetated with native grasses as recommended by the New Mexico Land Office.

APPENDIX I

ANALYSIS





# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

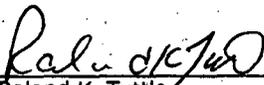
ALLSTATE SERVICES ENVIRONMENTAL  
ATTN: MR. BILLY SULLIVAN  
P.O. BOX 11322  
MIDLAND, TEXAS 79702  
FAX: 682-4182

Sample Type: Soil  
Sample Condition: Intact/Iced/ 4.0 deg C  
Project #: Saga-Todd Pitt  
Project Name: None Given  
Project Location: Millsand, N.M.

Sampling Date: 05/04/01  
Receiving Date: 05/04/01  
Analysis Date: 05/07/01

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg
40030	Saga #1	<100	11941
40031	Saga #1 BH 3'	<10	<10
40032	Saga #2 BH 4'	<10	<10
40033	Saga #2 SW 2'	<10	<10
40034	Saga #3 BH 4'	<10	<10
40035	Saga #4 BH 4'	<10	<10
40036	Saga #5 BH 4'	<10	<10
40037	Saga #6 BH 8'	<10	<10
40038	Saga #7 BH 10'	<10	<10
40039	Saga #8 BH 6'	<10	<10
40040	Saga #9 BH 5'	<10	<10
40041	Saga #4A BH 6'	<10	<10
	% IA	108	109
	%EA	97	95
	BLANK	<10	<10

Methods: EPA SW 846-8015M GRO/DRO

  
Raland K. Tuttle

5-8-01  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ALLSTATE SERVICES ENVIRONMENTAL  
ATTN: MR. BILLY SULLIVAN  
P.O. BOX 11322  
MIDLAND, TEXAS 79702  
FAX: 682-4182

Sample Type: Soil  
Sample Condition: Intact/ Iced/ 4.0 deg. C  
Project #: Saga-Todd Pitt  
Project Name: None Given  
Project Location: Millsand, N.M.

Sampling Date: 05/04/01  
Receiving Date: 05/04/01  
Analysis Date: 05/04/01

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
40030	Saga #1	<0.025	<0.025	<0.025	<0.025	<0.025
40031	Saga #1 BH 3'	<0.025	<0.025	<0.025	<0.025	<0.025
40032	Saga #2 BH 4'	<0.025	<0.025	<0.025	<0.025	<0.025
40033	Saga #2 SW 2'	<0.025	<0.025	<0.025	<0.025	<0.025
40034	Saga #3 BH 4'	<0.025	<0.025	<0.025	<0.025	<0.025
40035	Saga #4 BH 4'	<0.025	<0.025	<0.025	<0.025	<0.025
40036	Saga #5 BH 4'	<0.025	<0.025	<0.025	<0.025	<0.025
40037	Saga #6 BH 8'	<0.025	<0.025	<0.025	<0.025	<0.025
40038	Saga #7 BH 10'	<0.025	<0.025	<0.025	<0.025	<0.025
40039	Saga #8 BH 6'	<0.025	<0.025	<0.025	<0.025	<0.025
40040	Saga #9 BH 5'	<0.025	<0.025	<0.025	<0.025	<0.025
40041	Saga #4A BH 6'	<0.025	<0.025	<0.025	<0.025	<0.025

%IA	92	93	96	103	95
%EA	90	93	94	104	97
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025

METHODS: EPA SW 846-8021B, 5030

  
Raland K. Tuttle

5-8-01  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

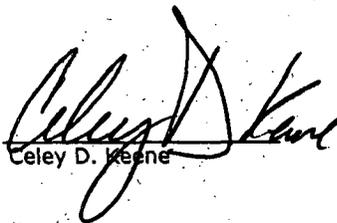
ALLSTATE SERVICES ENVIRONMENTAL  
ATTN: MR. RANDY OFFIELD  
P.O. BOX 11322  
MIDLAND, TEXAS 79702  
FAX: 682-4182

Sample Type: Soil  
Sample Condition: Intact/ Iced/ 4.0 deg C  
Project #: SAGA-Todd Pitt  
Project Name: None Given  
Project Location: Millsand, NM

Sampling Date: 05/04/01  
Receiving Date: 05/04/01  
Analysis Date: 05/29/01

ELT#	FIELD CODE	Chlorides mg/kg
40030	SAGA #1	224
40031	SAGA #1 BH 3'	331
40032	SAGA #2 BH 4'	510
40033	SAGA #2 SW 2'	2023
40034	SAGA #3 BH 4'	2072
40035	SAGA #4 BH 4'	13294
40036	SAGA #5 BH 4'	66.5
40037	SAGA #6 BH 8'	5388
40038	SAGA #7 BH 10'	4360
40039	SAGA #8 BH 6'	461
40040	SAGA #9 BH 5'	22.2
40041	SAGA #4A BH6'	8154
	Quality Control	5140
	True Value	5000
	% Precision	103
	Blank	<5

Methods: SW 846-9253

  
Celey D. Keene

05/29/01  
Date



# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ALLSTATE SERVICES ENVIRONMENTAL  
ATTN: MR. RANDY OFFIELD  
P.O. BOX 11322  
MIDLAND, TEXAS 79702  
FAX: 682-4182

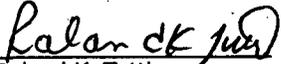
Sample Type: Soil  
Sample Condition: Intact/Iced/ 4.0 deg C  
Project #: Todd Pit  
Project Name: Saga Petroleum  
Project Location: Milnesand, N.M.

Sampling Date: 06/02/01  
Receiving Date: 06/04/01  
Analysis Date: 06/04/01

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg
40675	SPNW #1	<10	176
40676	SPEW #1	<10	<10
40677	SPSW #1	<10	<10
40678	SPBH 1	<10	<10
40679	SPBH 2	<10	<10
40680	SPNW 2	<10	<10
40681	SPSW 2	<10	<10

QUALITY CONTROL	515	499
TRUE VALUE	500	500
% INSTRUMENT ACCURACY	103	100
SPIKED AMOUNT	476	476
ORIGINAL SAMPLE	<10	176
SPIKE	520	690
SPIKE DUP	512	680
% EXTRACTION ACCURACY	108	106
BLANK	<10	<10
RPD	2	1

Methods: EPA SW 846-8015M GRO/DRO

  
Raland K. Tuttle

6-6-01  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ALLSTATE SERVICES ENVIRONMENTAL  
ATTN: MR. RANDY OFFIELD  
P.O. BOX 11322  
MIDLAND, TEXAS 79702  
FAX: 682-4182

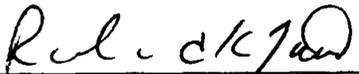
Sample Type: Soil  
Sample Condition: Intact/ Iced/ 4.0 deg C  
Project #: Todd Pit  
Project Name: Saga Petroleum  
Project Location: Milnesand, N.M.

Sampling Date: 06/02/01  
Receiving Date: 06/04/01  
Analysis Date: 06/04/01

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
40675	SPNW #1	<0.025	<0.025	<0.025	<0.025	<0.025
40676	SPEW #1	<0.025	<0.025	<0.025	<0.025	<0.025
40677	SPSW #1	<0.025	<0.025	<0.025	<0.025	<0.025
40678	SPBH 1	<0.025	<0.025	<0.025	<0.025	<0.025
40679	SPBH 2	<0.025	<0.025	<0.025	<0.025	<0.025
40680	SPNW 2	<0.025	<0.025	<0.025	<0.025	<0.025
40681	SPSW 2	<0.025	<0.025	<0.025	<0.025	<0.025

QUALITY CONTROL	0.114	0.110	0.107	0.230	0.110
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% INSTRUMENT ACCURACY	114	110	107	115	110
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.025	<0.025	<0.025	<0.025	<0.025
SPIKE	0.114	0.114	0.112	0.227	0.104
SPIKE DUP	0.108	0.108	0.105	0.227	0.104
% EXTRACTION ACCURACY	108	108	106	114	104
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025
RPD	6	6	7	0	0

METHODS: EPA SW 846-8021B ,5030

  
Raland K. Tuttle

5-6-01  
Date

**APPENDIX II**

**DAILY REPORTS**

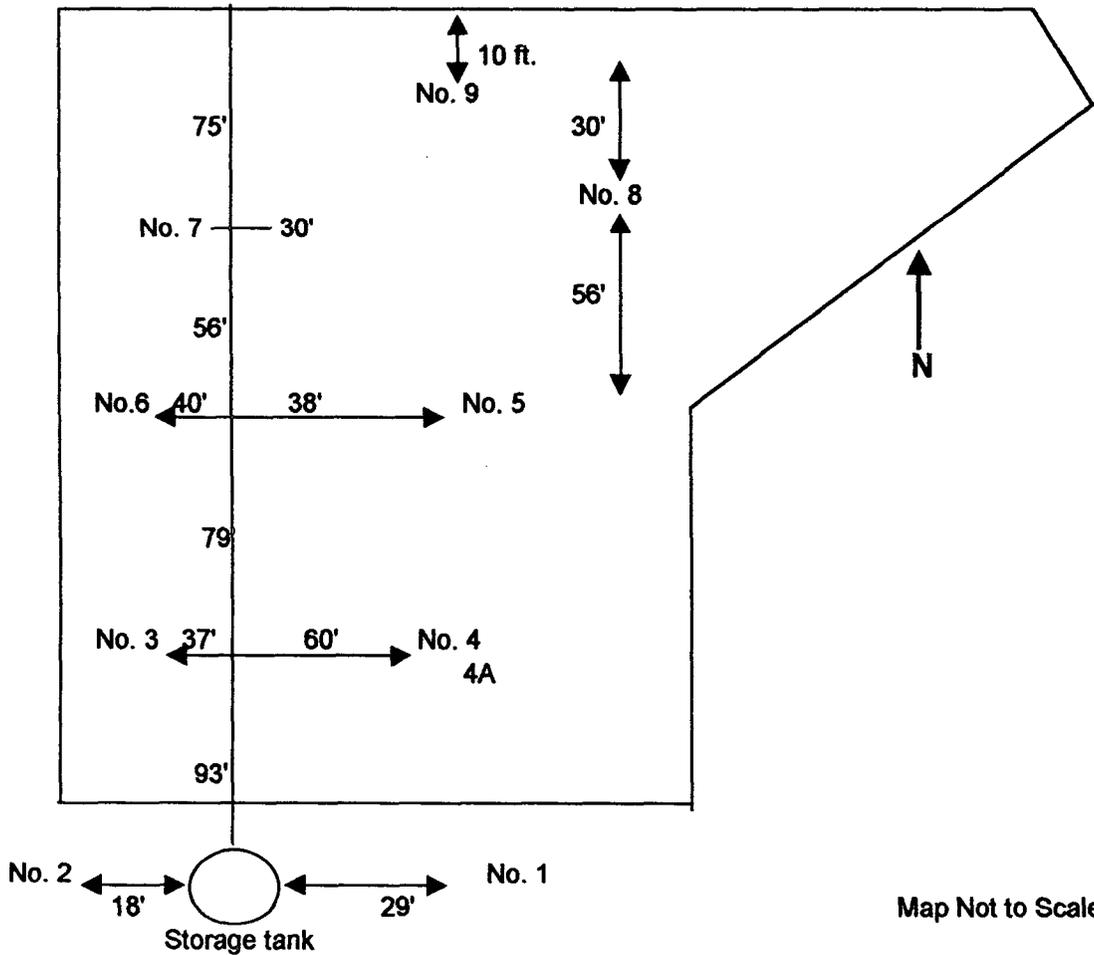
**NO DAILY REPORTS AVAILABLE**

## **APPENDIX III**

**Map of site on 5-4-01 and sample points and results.**

**APPENDIX III**  
5-4-01

FIELD		LAB		
		TPH - ppm	BTEX - ppm	CL - ppm
PID readings		5-04-01	5-04-01	5-29-01
5-04-01				
No. 1- 1'- B.H. 3' -	2.3 ppm 0 ppm	11941 ppm <10	<.025 <.025	224 331
No. 2- B.H. 4' - SW. 2' -	0.1 ppm 2.5 ppm	<10 <10	<.025 <.025	510 2023
No. 3- B.H. 4' -	2.5 ppm	<10	<.025	2072
No. 4- B.H. 4' -	11.0 ppm	<10	<.025	13294
No. 4A- B.H.6' -	0.1 ppm	<10	<.025	8154
No. 5- B.H. 4' -	2.3 ppm	<10	<.025	66.5
No. 6- B.H. 8' -	1.5 ppm	<10	<.025	5388
No. 7- B.H. 10' -	1.3 ppm	<10	<.025	4360
No. 8.- B.H. 8' -	1.5 ppm	<10	<.025	461
No. 9- B.H. 5' -	0.01 ppm	<10	<.025	22.2



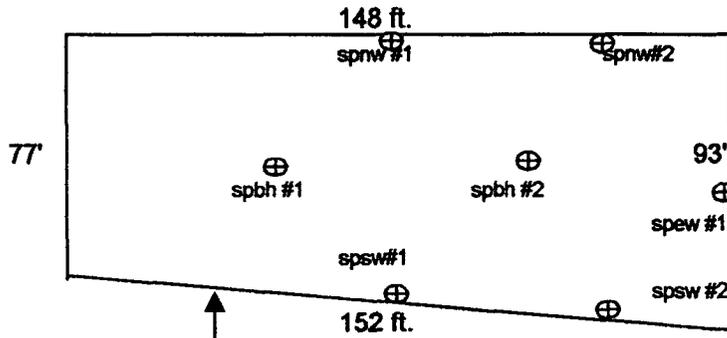
## **APPENDIX IV**

**Map of site on 6-5-01 with sample points and analyses.**

# APPENDIX IV

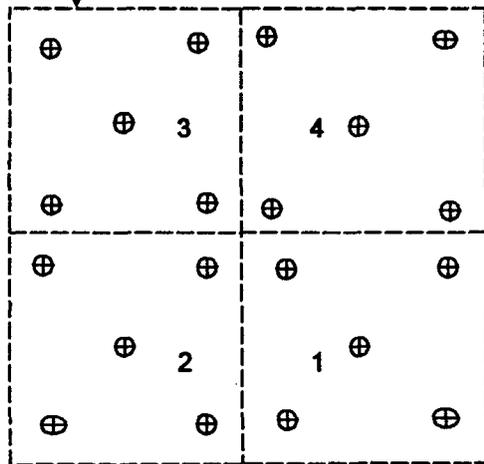
6-5-01

⊕ = Sample Points



	BTEX	TPH
sprnw #1	0.025 ppm	176 ppm
spew #1	0.025 ppm	<10 ppm
spsw #1	0.025 ppm	<10 ppm
spbh 1	0.025 ppm	<10 ppm
spbh 2	0.025 ppm	<10 ppm
spnw 2	0.025 ppm	<10 ppm
spsw 2	0.025 ppm	<10 ppm

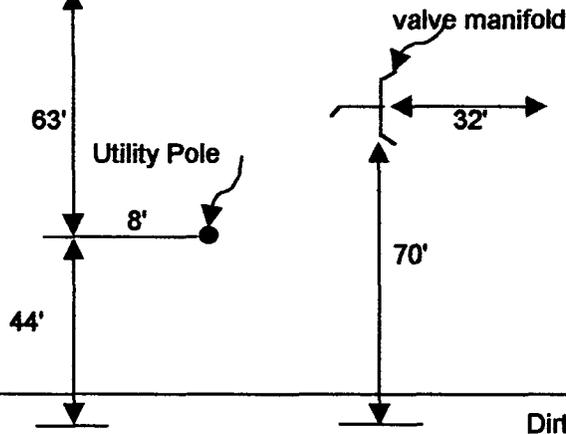
Composite sample points in these grids are 5 ft. in from corners and in center and all at 2 ft depth.



4-50' X 50' Grids

All points are near non-detect except TPH in section 4 being 66 ppm.

	BTEX	TPH
Grid #1	<0.025 ppm	<10 ppm
Grid #2	<0.025 ppm	<10 ppm
Grid #3	<0.025 ppm	<10 ppm
Grid #4	<0.025 ppm	66 ppm



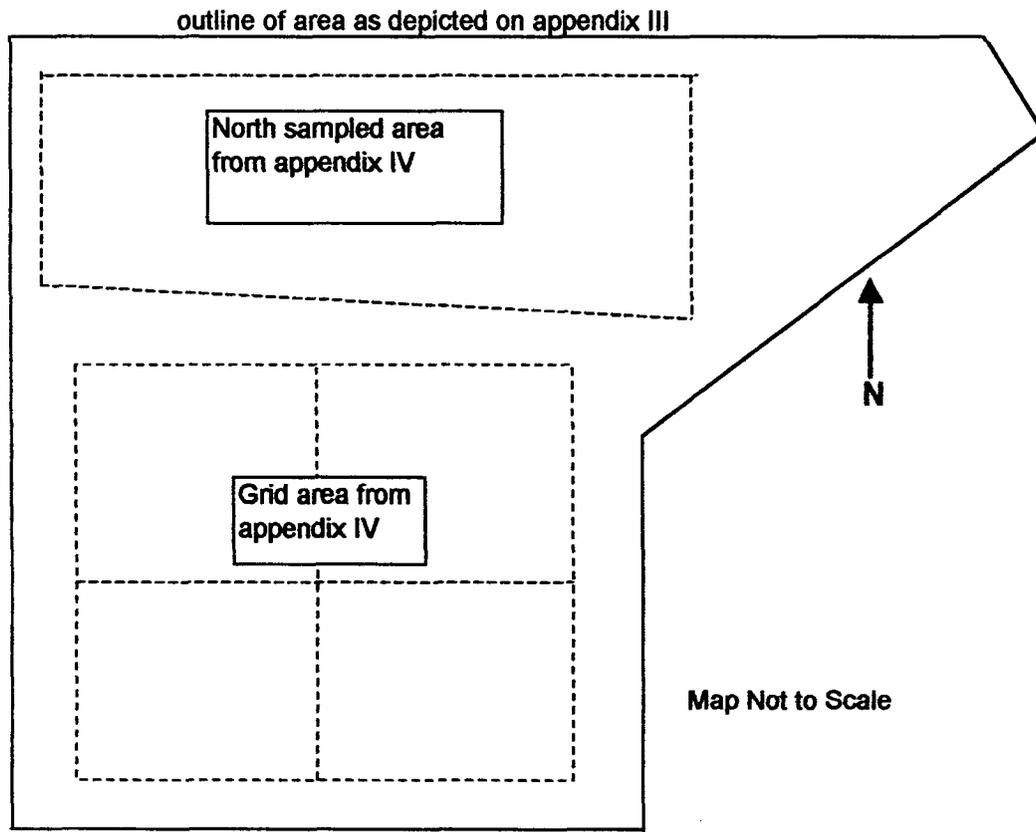
Map Not to Scale

Dirt Road

## APPENDIX V

Map of site showing relationship between Appendices III & IV.

# APPENDIX V



May 30, 2001

Saga Petroleum L.L.C.  
In Care of Allstate Environmental Services, L.L.C.  
P.O. Box 11322  
Midland, Texas 79702

Attention Saga Petroleum:

The New Mexico Oil Conservation Division is in receipt of the Saga Petroleum Todd Lower San Andres Unit Pit Work Plan dated May 29, 2001 located in UL B Section 31-Ts 7s-R 36E submitted by Allstate Environmental Services on behalf of Saga Petroleum.

The OCD hereby approves of the plan to utilize cement kiln material to stabilize contaminated soils and to restore the surface pursuant to the plan. Saga shall provide a closure plan for OCD approval by June 30, 2001.

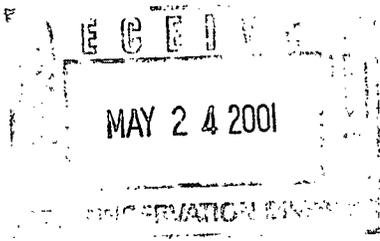
Please be advised that OCD approval does not relieve Saga Petroleum of future responsibility if their operations pose a threat to public health, fresh water or the environment. In addition this approval does not relieve Saga Petroleum of liability from any Federal, State, County or local laws, rules or regulations.

Sincerely Yours:

A handwritten signature in black ink, appearing to read "Wayne Price". The signature is cursive and somewhat stylized, with a large initial "W" and "P".

Wayne Price-Pet. Engr. Spec.

Original Will Follow in US Mail.



May 23, 2001

Wayne Price  
NMOCD  
1220 S. Saint Francis Drive  
Santa Fe, NM 87505

120316

**Re: Todd Lower San Andres Unit – pit cleanup**

Dear Wayne:

Attached is a work plan developed by Allstate Environmental Services to clean up a pit on Saga's Todd Lower Sand Andres Unit, Unit B, Section 31-T7S-R36E. Allstate Environmental will provide the equipment, supervision, sampling and technical expertise to ensure the pit is closed according to New Mexico state guidelines, and will submit a closure report when the project is completed. I would also like to note that this pit is of an unknown origin, was never used in the Saga Petroleum operations, and was apparently covered by a previous operator.

Saga would like to begin this project as soon as possible after NMOCD approval. Allstate Environmental indicates that they have a window for equipment and personnel available to begin closure starting May 29, 2001. If you have any additional questions, or need any additional information, please call.

Sincerely,

Joe N. Clement  
Area Engineer

**Saga Petroleum L.L.C.**  
**Todd Lower San Andres Unit Pit Project**  
**Work Plan For State of New Mexico**



# ALLSTATE ENVIRONMENTAL SERVICES, LLC



P.O BOX 11322  
MIDLAND, TEXAS 79702  
OFFICE: (915) 682-3547  
FAX: (915) 682-4182

May 16, 2001

New Mexico Oil Conservation Division  
1220 S. Saint Francis Drive  
Santa Fe, New Mexico 87505  
ATTN: Mr. Wayne Price

Dear Mr. Price,

The following is a work plan that Allstate Environmental Services LLC. is submitting on behalf of SAGA Petroleum L.L.C. of Midland, Texas. This proposal plan is for the Todd Lower San Andres Unit Pit located in Roosevelt County New Mexico. The legals are as follows: Section 31- Township 7 South- Range 36 East- Unit B.

AES is proposing to encapsulate the contents of the pit and the surrounding surface soil that have been impacted. Cement Kiln Dust will be the encapsulation Material.

## PLAN OF ACTION:

\* The pit area and it's contents will be excavated and stockpiled on the surface. Once the contaminated soil has been excavated from the pit area AES will lay out a grid, each area will measure 50' X 50' and one composite sample will be taken from each block. Bottomhole and sidewall samples will be taken and analyzed using method EPA 846-8015m- DRO-GRO for TPH and method EPA 846-8021B, 5030 for BTEX. AES is seeking a 5,000 PPM closure level based on the ranking criteria set forth by the Unlined Surface Impoundment Guidelines. (Please see the attached water data AES obtained from the Stateland office in Clovis and the State Engineers office in Roswell.)

Suspect areas of contamination on the location will be excavated and incorporated into the pit material. The same sampling procedure will be used to sample this area, defining vertical and horizontal extent as used for the pit area.

Once the areas are sampled and thru analysis proven below the required closure levels CKD material will be introduced into the pit area. The encapsulation process will begin by placing the contaminated material stockpiled on location into the CKD material and thoroughly mixing while water is added to the matrix. This procedure will continue until all of the contaminated material is incorporated into the matrix and mixed. AES is anticipating utilizing the excavated area adjacent to the pit as a mixing area also.

When the encapsulation process is finished, clean top soil will be brought in and used for backfill. The areas of excavation will be backfilled back to surface grade. After backfilling is accomplished the entire area will be reseeded with vegetation deemed appropriate by the New Mexico State Land Office.

A closure report will follow documenting the activities- sample points- dimensions- and analysis of this project.

Thank you for your time in reviewing this plan. If there are any questions please call me at (915)682-3547.

Sincerely,

A handwritten signature in cursive script that reads "Randy Offield".

Randy Offield

Table 2.—Well Location and Water-level Data for Selected Wells in the Cussey-Clingo Recharge Area, Roosevelt and Chavez Counties, New Mexico, and Bell and Cochran Counties, Texas—Continued

Well location	Geologic unit	Winter water level (feet below/above land surface)	Date of measurement	Winter 1985 to 1989-90		Water-level extremes		Use of water	Years of record
				Winter 1985 to 1989-90 decline (-) or rise (+) (feet)	Range (feet)	Low	Year		
0-75, 148E-17, 212112	CRCS	-1.89, 73	2-02-90	+1.25	-1879-793	1990	-191.48	1975	1975, 1980, 1985, 1990
0-75, 148E-22, 242416	CRCS	-1.73, 98	1-11-90	--	-1733-988	1990	-273.98	1990	1990
0-75, 148E-24, 231412	OCIL	-1.80, 32	1-11-90	-0.29	-1800-083	1985	-80.48	1980	1980, 1985, 1990
0-75, 148E-26, 231134	OCIL	-1.76, 28	1-11-90	-0.18	-1788-082	1985	-85.78	1980	1980, 1985, 1990
0-75, 148E-28, 193113	OCIL	-83.31	1-11-90	-0.68	-822-3-5	1980	-83.31	1990	1980, 1985, 1990
0-75, 148E-28, 233134	CRCS	-82.73	1-11-90	--	-822-7-1	1990	-82.73	1990	1990
0-75, 148E-32, 121212	CRCS	-96.05	2-02-90	-0.23	-925-8-0	1985	-96.05	1980	1980, 1985, 1990
0-75, 148E-35, 433113	CRCS	-71.26	1-11-90	+4.80	-722-0-7	1985	-70.40	1980	1980, 1985, 1990
0-75, 148E-36, 232422	CRCS	-70.40	1-11-90	-0.47	-692-0-3	1985	-70.40	1980	1980, 1985, 1990
0-75, 158E-01, 11241	CRCS	-2 00.81	1-26-90	+2.21	-1652-2-0	1970	-205.08	1975	1970, 1975, 1980, 1985, 1990
0-75, 158E-07, 32113	--	-1.91, 43	2-02-90	--	-1912-4-3	1990	-191.43	1990	1990
0-75, 158E-09, 12241	--	-2 00.10	2-02-90	+2.13	-2000-1-0	1990	-201.76	1980	1975, 1980, 1985, 1990
0-75, 158E-10, 22222	--	-1.98, 54	2-02-90	--	-1983-5-4	1990	-198.54	1990	1990
0-75, 158E-11, 111212	CRCS	-1.98, 63	2-02-90	+1.62	-1983-6-3	1990	-201.36	1980	1975, 1980, 1985, 1990
0-75, 158E-12, 111111	CRCS	-1.94, 74	2-02-90	+1.73	-1984-7-4	1990	-198.83	1975	1975, 1980, 1985, 1990
0-75, 158E-17, 142112	CRCS	-1.92, 19	2-02-90	+0.66	-1984-1-9	1990	-193.89	1990	1975, 1980, 1985, 1990
0-75, 158E-23, 221422	OCIL	-1.98, 66	2-02-90	--	-1984-6-6	1990	-198.66	1990	1990
0-75, 158E-26, 333122	OCIL	-48.16	2-02-90	+2.19	-481-1-5	1990	-52.46	1980	1980, 1985, 1990
0-75, 158E-29, 122222	OCIL	-1.97, 67	2-02-90	+2.79	-187-6-7	1990	-163.13	1980	1980, 1985, 1990
0-75, 158E-31, 333133	OCIL	-83.39	2-02-90	+1.82	-83-3-9	1990	-83.20	1980	1980, 1985, 1990
0-75, 158E-34, 44441	OCIL	-1.23, 70	2-02-90	--	-123-7-0	1990	-126.43	1980	1980, 1985, 1990
0-75, 158E-01, 41143	OCIL	-1.68, 46	2-01-90	+0.76	-168-1-5	1980	-169.43	1980	1980, 1985, 1990
0-75, 158E-03, 11111	OCIL	-1.66, 58	2-01-90	+1.27	-166-3-8	1980	-170.39	1980	1975, 1980, 1985, 1990
0-75, 158E-05, 33242	CRCS	-1.68, 97	2-01-90	+1.63	-168-9-7	1990	-172.83	1980	1975, 1980, 1985, 1990
0-75, 158E-10, 112124	OCIL	-1.80, 59	2-01-90	+1.50	-180-5-9	1990	-182.18	1980	1980, 1985, 1990
0-75, 158E-11, 41113	OCIL	-1.85, 71	2-01-90	+0.73	-185-7-1	1990	-186.99	1971	1970, 1975, 1980, 1985, 1990
0-75, 158E-23, 232221	OCIL	-1.85, 16	2-01-90	+0.26	-185-5-6	1980	-185.42	1981	1980, 1985, 1990
0-75, 158E-24, 43311	OCIL	-1.79, 15	2-01-90	--	-179-5-4	1980	-182.12	1981	1980, 1985, 1990
0-75, 158E-27, 422131	OCIL	-1.88, 99	2-01-90	-1.11	-188-8-8	1990	-186.99	1980	1980, 1985, 1990
0-75, 158E-28, 193433A	--	-1.84, 81	2-01-90	--	-184-8-1	1990	-184.81	1990	1990
0-75, 158E-29, 11413	OCIL	-1.89, 92	2-01-90	+0.88	-189-8-2	1990	-187.33	1980	1980, 1985, 1990
0-75, 158E-36, 33113	OCIL	-1.85, 82	2-01-90	+1.14	-185-8-2	1990	-186.92	1980	1980, 1985, 1990
0-75, 158E-36, 33113	OCIL	-1.85, 82	2-01-90	+1.14	-185-8-2	1990	-186.92	1980	1980, 1985, 1990
0-75, 158E-01, 33113	CRCS	-1.85, 10	2-01-90	+1.86	-185-1-0	1990	-186.92	1980	1975, 1980, 1985, 1990
0-75, 158E-04, 241132	CRCS	-1.28, 98	2-01-90	+1.34	-128-1-0	1990	-130.32	1980	1975, 1980, 1985, 1990
0-75, 158E-08, 312243	OCIL	-1.72, 08	2-01-90	+0.56	-172-0-8	1990	-173.09	1980	1980, 1985, 1990
0-75, 158E-09, 242223	CRCS	-1.48, 80	2-01-90	+0.34	-148-8-0	1990	-149.14	1980	1975, 1980, 1985, 1990
0-75, 158E-13, 133114	CRCS	-1.54, 80	2-01-90	+0.96	-154-8-0	1990	-161.30	1980	1975, 1980, 1985, 1990
0-75, 158E-15, 214222	CRCS	-1.72, 15	2-01-90	+0.30	-172-1-5	1990	-173.60	1980	1975, 1980, 1985, 1990
0-75, 158E-18, 144124	CRCS	-1.78, 09	2-01-90	+4.53	-178-0-9	1990	-182.62	1980	1975, 1980, 1985, 1990
0-75, 158E-19, 133434	OCIL	-1.81, 20	2-01-90	-0.03	-181-1-7	1985	-188.62	1980	1980, 1985, 1990

Best

DATE	LEVEL MS	DATE	LEVEL MS	DATE	LEVEL MS
JAN 10, 1980	163.13	JAN 10, 1985	160.46	FEB 07, 1990	157.67

HIGHEST 157.67 FEB 07, 1990  
 LOWEST 163.13 JAN 10, 1980

SITE ID: 333930103241901  
 LOC: 075.35E.31.333333  
 DTID: 12559  
 ELEV: 4250.00  
 USE: S  
 DEPTH: 120  
 SED. UNIT: 1210GLL

WATER LEVELS IN FEET BELOW LAND SURFACE DATUM

DATE	WATER LEVEL MS	DATE	WATER LEVEL MS	DATE	WATER LEVEL MS
FEB 05, 1980	55.04	JAN 09, 1985	55.20	FEB 07, 1990	53.39

HIGHEST 53.39 FEB 07, 1990  
 LOWEST 55.20 JAN 09, 1985

10DATE: 06/10/97 PROVISIONAL GROUNDWATER DATA THRU JUNE 1997 ROOSEVELT COUNTY, NM. PAGE 841

SITE ID: 333931103201301  
 LOC: 075.35E.31.444441  
 DTID: 12560  
 ELEV: 4192.00  
 USE: S  
 DEPTH:  
 SED. UNIT: 1210GLL

WATER LEVELS IN FEET BELOW LAND SURFACE DATUM

DATE	WATER LEVEL MS						
JAN 10, 1980	126.43	NOV 30, 1989	124.36	FEB 07, 1990	123.70	JAN 04, 1995	115.76 S

HIGHEST 115.76 JAN 04, 1995  
 LOWEST 126.43 JAN 10, 1980

SITE ID: 334410103100401  
 LOC: 075.36E.01.411141  
 DTID: 12561  
 ELEV: 4105.00  
 USE: S  
 DEPTH:  
 SED. UNIT: 1210GLL

WATER LEVELS IN FEET BELOW LAND SURFACE DATUM

DATE	WATER LEVEL MS	DATE	WATER LEVEL MS	DATE	WATER LEVEL MS	DATE	WATER LEVEL MS
JAN 08, 1980	155.77	FEB 12, 1985	169.43	JAN 16, 1995	167.48 S		
JAN 23, 1985	169.22	FEB 01, 1990	168.45				

HIGHEST 155.77 JAN 08, 1980  
LOWEST 169.43 MAR 12, 1975

SITE ID: 334423103156601  
LOC: 07S.36E.03.11111  
QTID: 11520  
ELEV: 4143.00  
USE: S  
DEPTH:  
GEO. UNIT: 12106LL

WATER LEVELS IN FEET BELOW LAND SURFACE DATUM

DATE	WATER LEVEL MS	DATE	WATER LEVEL MS	DATE	WATER LEVEL MS	DATE	WATER LEVEL MS
MAR 12, 1975	170.39	JAN 08, 1980	169.34	FEB 01, 1990	166.58		
MAR 26, 1975	169.86 R	JAN 23, 1985	167.83	JAN 06, 1995	167.39 S		

HIGHEST 166.58 FEB 01, 1990  
LOWEST 170.39 MAR 12, 1975

DATE: 05/10/97

PROVISIONAL GROUNDWATER DATA THRU JUNE 1997 ROOSEVELT COUNTY, NM.

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SITE ID: 334340103165601  
LOC: 07S.36E.05.33242  
QTID: 11521  
ELEV: 4165.00  
USE: I  
DEPTH: 200  
GEO. UNIT: 2106RCS

WATER LEVELS IN FEET BELOW LAND SURFACE DATUM

DATE	WATER LEVEL MS						
MAR 27, 1975	172.40	JAN 08, 1980	172.83	JAN 25, 1985	170.60	FEB 07, 1990	168.97

HIGHEST 168.97 FEB 07, 1990  
LOWEST 172.83 JAN 08, 1980

SITE ID: 334344103190201  
LOC: 07S.36E.05.314343  
QTID: 11522  
ELEV: 4198.00  
USE: S  
DEPTH: 205  
GEO. UNIT: 2106RCS

WATER LEVELS IN FEET BELOW LAND SURFACE DATUM

DATE	WATER LEVEL MS	DATE	WATER LEVEL MS	DATE	WATER LEVEL MS
MAR 27, 1975	197.95	JAN 08, 1980	195.05	JAN 25, 1985	194.00

HIGHEST 194.00 JAN 25, 1985  
LOWEST 197.95 MAR 27, 1975

SITE ID: 334350103145101

LOC: 078.36E.10.112124  
DTID: 12562  
ELEV: 4140.00  
USE: H  
DEPTH:  
GEO. UNIT: 12106LL

WATER LEVELS IN FEET BELOW LAND SURFACE DATUM

DATE	WATER LEVEL MS						
JAN 08, 1980	182.18	JAN 24, 1985	182.09	FEB 01, 1990	180.59	JAN 16, 1995	179.77 S

HIGHEST 179.77 JAN 16, 1995  
LOWEST 182.18 JAN 08, 1980

IGATE: 06/10/97

PROVISIONAL GROUNDWATER DATA THRU JUNE 1997 ROOSEVELT COUNTY, NM.

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SITE ID: 334304103133301  
LOC: 078.36E.11.411113  
DTID: 11523  
ELEV: 4129.00  
USE: B  
DEPTH:  
GEO. UNIT: 12106LL

WATER LEVELS IN FEET BELOW LAND SURFACE DATUM

DATE	WATER LEVEL MS	DATE	WATER LEVEL MS	DATE	WATER LEVEL MS	DATE	WATER LEVEL MS
MAR 12, 1970	186.99	JAN 16, 1980	186.54	FEB 01, 1990	185.71		
MAR 26, 1975	186.32	JAN 23, 1985	186.44	JAN 18, 1995	185.36 S		

HIGHEST 185.36 JAN 18, 1995  
LOWEST 186.99 MAR 12, 1970

SITE ID: 334329103120201  
LOC: 078.36E.12.24414  
DTID: 12567  
ELEV: 4112.00  
USE: B  
DEPTH:  
GEO. UNIT: 12106LL

WATER LEVELS IN FEET BELOW LAND SURFACE DATUM

DATE	WATER LEVEL MS
------	-------------------

JAN 16, 1980 185.43

SITE ID: 334114103133901  
LOC: 078.36E.23.323221  
DTID: 12544  
ELEV: 4110.00  
USE: B  
DEPTH:  
GEO. UNIT: 12106LL

WATER LEVELS IN FEET BELOW LAND SURFACE DATUM

DATE	WATER LEVEL MS						
JAN 11, 1980	154.58	JAN 23, 1985	185.42	FEB 14, 1990	185.16	JAN 15, 1995	185.67 S

HIGHEST 154.58 JAN 11, 1980  
 LOWEST 185.67 JAN 15, 1995

DATE: 02/10/97

PROVISIONAL GROUNDWATER DATA THRU JUNE 1997 ROOSEVELT COUNTY, NN.

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SITE ID: 334117103122801  
 LOC: 078.36E.24.43331  
 OTID: 12565  
 ELEV: 4100.00  
 USE: S  
 DEPTH: 191  
 SED. UNIT: 12106LL

WATER LEVELS IN FEET BELOW LAND SURFACE DATUM

DATE	WATER LEVEL MS	DATE	WATER LEVEL MS	DATE	WATER LEVEL MS
JAN 15, 1980	182.19	JAN 15, 1985	190.47 P	FEB 14, 1990	179.20

HIGHEST 179.20 FEB 14, 1990  
 LOWEST 182.19 JAN 15, 1980

SITE ID: 334040103140401  
 LOC: 078.36E.37.424231  
 OTID: 12566  
 ELEV: 4119.00  
 USE: U  
 DEPTH:  
 SED. UNIT: 12106LL

WATER LEVELS IN FEET BELOW LAND SURFACE DATUM

DATE	WATER LEVEL MS	DATE	WATER LEVEL MS	DATE	WATER LEVEL MS
JAN 15, 1980	186.35	JAN 15, 1985	185.88	FEB 08, 1990	186.99

HIGHEST 185.88 JAN 15, 1985  
 LOWEST 186.99 FEB 08, 1990

SITE ID: 334049103154402  
 LOC: 078.36E.28.1434334  
 OTID: 06224  
 ELEV: 4138.00  
 USE: S  
 DEPTH: 202  
 SED. UNIT:

WATER LEVELS IN FEET BELOW LAND SURFACE DATUM

DATE	WATER LEVEL MS	DATE	WATER LEVEL MS
------	----------------	------	----------------

FEB 08, 1990 184.81      JAN 13, 1995 183.93 S

HIGHEST 183.93 JAN 13, 1995  
LOWEST 184.81 FEB 08, 1990

DATE: 05/10/97      PROVISIONAL GROUNDWATER DATA THRU JUNE 1997 ROOSEVELT COUNTY, NM.      PAGE 845

SITE ID: 334103103145701  
LOC: 078.36E.29.11413  
OTID: 12567  
ELEV: 4146.00  
USE: S  
DEPTH: 230  
GEO. UNIT: 1210GLL

WATER LEVELS IN FEET BELOW LAND SURFACE DATUM

DATE	WATER LEVEL MS	DATE	WATER LEVEL MS	DATE	WATER LEVEL MS	DATE	WATER LEVEL MS
JAN 11, 1980	187.03	JAN 11, 1985	183.80	FEB 15, 1990	184.92	JAN 13, 1995	184.03 S
HIGHEST 184.03		JAN 13, 1995					
LOWEST 187.03		JAN 11, 1980					

SITE ID: 333931103140501  
LOC: 078.36E.34.444542  
OTID: 12492  
ELEV: 4190.00  
USE: S  
DEPTH: 179  
GEO. UNIT: 1210GLL

WATER LEVELS IN FEET BELOW LAND SURFACE DATUM

DATE	WATER LEVEL MS
JAN 15, 1985	159.39

SITE ID: 333940103135901  
LOC: 078.36E.36.33113  
OTID: 12868  
ELEV: 4092.00  
USE: S  
DEPTH:  
GEO. UNIT: 1210GLL

WATER LEVELS IN FEET BELOW LAND SURFACE DATUM

DATE	WATER LEVEL MS	DATE	WATER LEVEL MS	DATE	WATER LEVEL MS	DATE	WATER LEVEL MS
JAN 15, 1980	175.02	JAN 30, 1985	154.90	JAN 04, 1995	153.94 S		
JAN 15, 1985	154.96	FEB 08, 1990	153.82				
HIGHEST 153.82		FEB 08, 1990					
LOWEST 175.02		JAN 15, 1980					

DATE: 05/10/97      PROVISIONAL GROUNDWATER DATA THRU JUNE 1997 ROOSEVELT COUNTY, NM.      PAGE 846



# ALLSTATE ENVIRONMENTAL SERVICES, LLC



P.O BOX 11322  
MIDLAND, TEXAS 79702  
OFFICE: (915) 682-3547  
FAX: (915) 682-4182



May 29, 2001

New Mexico Oil Conservation Division  
1220 S. Saint Francis Drive  
Santa Fe, New Mexico 87505  
ATTN: Mr. Wayne Price

Dr. Mr. Price,

The Saga Petroleum L.L.C. Todd Lower San Andres Unit Pit, located in Roosevelt county New Mexico whose legals are Section 31- Township 7 South- Range 36 East. Unit B was delineated by Allstate Environmental Services L.L.C. on May 4, 2001. A 410 John Deere extendahoe was used to trench areas of the pit. Samples were obtained from the bottom of each trench (see map) and analyzed using method EPA SW 846-8015M GRO/DRO for TPH, EPA SW 84608021B, 5030 for BTEX and method SW 846-9253 for chloride (see attached analytical). The depth of the trenches varied form 2' to 10'. Field screening was performed using a PID (see result map APPENDIX ONE) and by smell and visual. Stained areas where surface equipment was in place were sampled (see map APPENDIX ONE & TWO) and the same analytical methods were used as above (see analytical).

Saga Petroleum L.L.C. provided AES with a verbal history of the site. The facility was a tank battery installation used exclusively for production and storage of oil. The pit located directly behind the tanks is where the tanks were drained of BS & W.

AES believes that the facility being used exclusively for oilfield production purposes, and the pit was used to drain the tanks into, qualifies as an exempt facility.

AES would like to propose the following, PLAN OF ACTION:

\*The pit area and it's contents will be excavated and stockpiled on the surface. Once the contaminated soil has been excavated from the pit area AES will lay out a grid, each area will measure 50' X 50' and one composite sample will be taken from each block. Bottomhole and sidewall samples will be taken and analyzed using the method EPA 846-8015M DRO/GRO for TPH, method EPA 846-8021B, 5030 for BTEX, and method SW 846-9253 for chloride. AES is seeking a 5,000 PPM closure level based on the ranking criteria set forth by the Unlined Surface Impoundment Guidelines. (Please see attached water data AES obtained from the Stateland office in Clovis and the State Engineers office in Roswell.)

Suspect areas of contamination on the location will be excavated and incorporated into the pit material. The same sampling procedure will be used to sample this area, defining vertical and horizontal extent as used for the pit area.

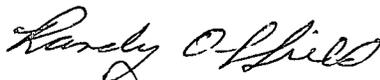
Once the areas are sampled and thru analysis proven below the required closure levels CKD material will be introduced into the pit area. The encapsulation process will begin by placing the contaminated material stockpiled on location into the CKD materail and thoroughly mixing while water is incorporated into the matrix and mixed. AES is anticipating utilizing the excavated area adjacent to the pit as a mixing area also.

When the encapsulation process is finished, clean top soil will be brought in and used for backfill. The areas of excavation will be backfilled back to surface grade. After backfilling is accomplished the entire area will be reseeded with vegetation deemed appropriate by the New Mexico State Land Office.

A closure report will follow documenting the activities- sample points- dimensions- and analysis of this project.

Thank you for your time in reviewing this plan. If there are any questions please call me at (915)682-3547.

Sincerely,



Randy Offield

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

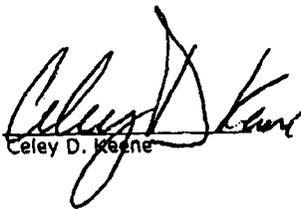
ALLSTATE SERVICES ENVIRONMENTAL  
ATTN: MR. RANDY OFFIELD  
P.O. BOX 11322  
MIDLAND, TEXAS 79702  
FAX: 682-4182

Sample Type: Soil  
Sample Condition: Intact/ Iced/ 4.0 deg C  
Project #: SAGA-Todd Pitt  
Project Name: None Given  
Project Location: Millsand, NM

Sampling Date: 05/04/01  
Receiving Date: 05/04/01  
Analysis Date: 05/29/01

ELT#	FIELD CODE	Chlorides mg/kg
40030	SAGA #1	224
40031	SAGA #1 BH 3'	331
40032	SAGA #2 BH 4'	510
40033	SAGA #2 SW 2'	2023
40034	SAGA #3 BH 4'	2072
40035	SAGA #4 BH 4'	13294
40036	SAGA #5 BH 4'	66.5
40037	SAGA #6 BH 8'	5388
40038	SAGA #7 BH 10'	4360
40039	SAGA #8 BH 6'	461
40040	SAGA #9 BH 5'	22.2
40041	SAGA #4A BH6'	8154
	Quality Control	5140
	True Value	5000
	% Precision	103
	Blank	<5

Methods: SW 846-9253

  
Caley D. Keene

05/29/01  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

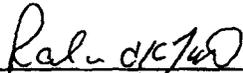
ALLSTATE SERVICES ENVIRONMENTAL  
ATTN: MR. BILLY SULLIVAN  
P.O. BOX 11322  
MIDLAND, TEXAS 79702  
FAX: 682-4182

Sample Type: Soil  
Sample Condition: Intact/Iced/ 4.0 deg C  
Project #: Saga-Todd Pitt  
Project Name: None Given  
Project Location: Millsand, N.M.

Sampling Date: 05/04/01  
Receiving Date: 05/04/01  
Analysis Date: 05/07/01

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg
40030	Saga #1	<100	11941
40031	Saga #1 BH 3'	<10	<10
40032	Saga #2 BH 4'	<10	<10
40033	Saga #2 SW 2'	<10	<10
40034	Saga #3 BH 4'	<10	<10
40035	Saga #4 BH 4'	<10	<10
40036	Saga #5 BH 4'	<10	<10
40037	Saga #6 BH 8'	<10	<10
40038	Saga #7 BH 10'	<10	<10
40039	Saga #8 BH 6'	<10	<10
40040	Saga #9 BH 5'	<10	<10
40041	Saga #4A BH 6'	<10	<10
	% IA	108	109
	%EA	97	95
	BLANK	<10	<10

Methods: EPA SW 846-8015M GRO/DRO

  
Ralund K. Tuttle

5-8-01  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ALLSTATE SERVICES ENVIRONMENTAL  
ATTN: MR. BILLY SULLIVAN  
P.O. BOX 11322  
MIDLAND, TEXAS 79702  
FAX: 682-4182

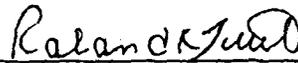
Sample Type: Soil  
Sample Condition: Intact/ Iced/ 4.0 deg. C  
Project #: Saga-Todd Pitt  
Project Name: None Given  
Project Location: Millsand, N.M.

Sampling Date: 05/04/01  
Receiving Date: 05/04/01  
Analysis Date: 05/04/01

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
40030	Saga #1	<0.025	<0.025	<0.025	<0.025	<0.025
40031	Saga #1 BH 3'	<0.025	<0.025	<0.025	<0.025	<0.025
40032	Saga #2 BH 4'	<0.025	<0.025	<0.025	<0.025	<0.025
40033	Saga #2 SW 2'	<0.025	<0.025	<0.025	<0.025	<0.025
40034	Saga #3 BH 4'	<0.025	<0.025	<0.025	<0.025	<0.025
40035	Saga #4 BH 4'	<0.025	<0.025	<0.025	<0.025	<0.025
40036	Saga #5 BH 4'	<0.025	<0.025	<0.025	<0.025	<0.025
40037	Saga #6 BH 8'	<0.025	<0.025	<0.025	<0.025	<0.025
40038	Saga #7 BH 10'	<0.025	<0.025	<0.025	<0.025	<0.025
40039	Saga #8 BH 6'	<0.025	<0.025	<0.025	<0.025	<0.025
40040	Saga #9 BH 5'	<0.025	<0.025	<0.025	<0.025	<0.025
40041	Saga #4A BH 6'	<0.025	<0.025	<0.025	<0.025	<0.025

%IA	92	93	96	103	95
%EA	90	93	94	104	97
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025

METHODS: EPA SW 846-8021B ,5030

  
Roland K. Tuttle

5-8-01  
Date

**Saga Petroleum, L.L.C.  
Todd Lower San Andres Unit Pit  
Roosevelt County, New Mexico  
Proposed Plan of Action**

**Prepared By:  
Allstate Environmental Services, L.L.C.  
P.O. Box 11322  
Midland, Texas 79702  
1-915-682-3547**

**TABLE OF CONTENTS**

**Delineation**

**Plan of Action**

**Maps**

**Analytical**

**Pictures**

**MSDS for CKD Material**



# ALLSTATE ENVIRONMENTAL SERVICES, LLC



P.O BOX 11322  
MIDLAND, TEXAS 79702  
OFFICE: (915) 682-3547  
FAX: (915) 682-4182

May 29, 2001

New Mexico Oil Conservation Division  
1220 S. Saint Francis Drive  
Santa Fe, New Mexico 87505  
ATTN: Mr. Wayne Price

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Sincerely,

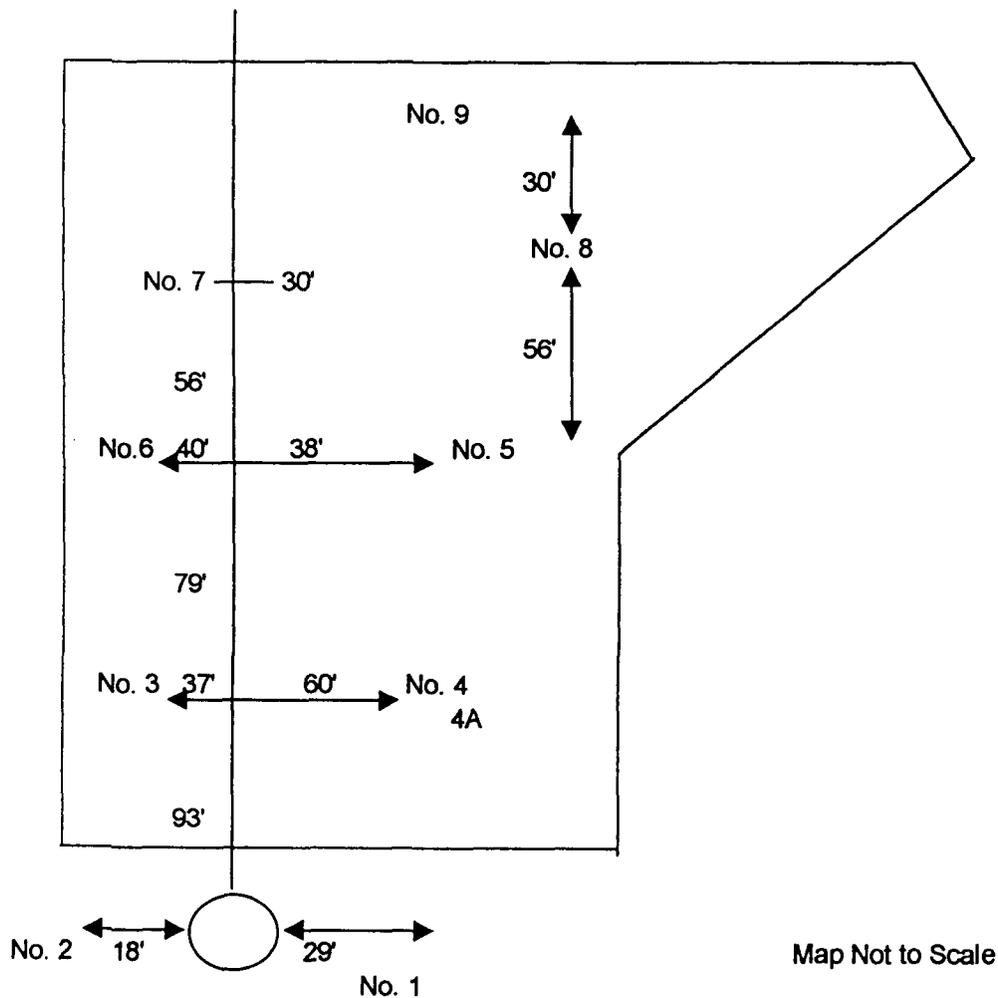


Randy Offield

Saga-Todd Pit



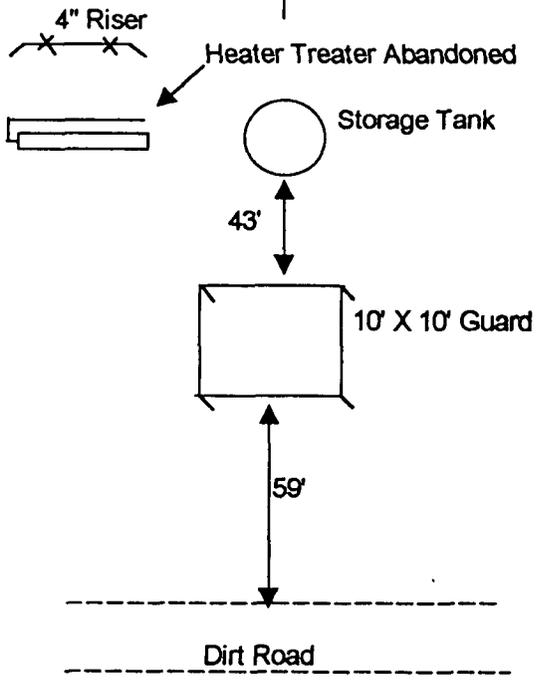
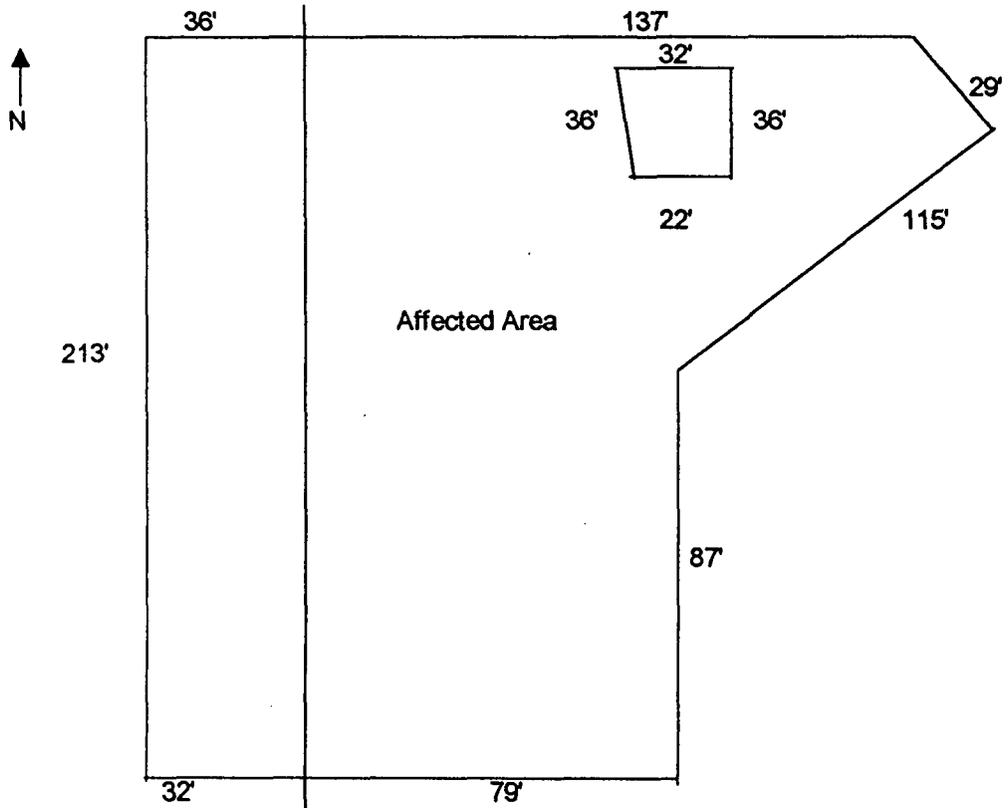
- No. 1- 1'- 2.3 P.P.M.  
B.H. 3' - 0 P.P.M.
- No. 2- B.H. 4' - 0.1 P.P.M.  
SW. 2' - 2.5 P.P.M.
- No. 3- B.H. 4' - 2.5 P.P.M.
  
- No. 4- B.H. 4' - 11.0 P.P.M.
- No. 4A- B.H.6' -0.1 P.P.M.
- No. 5- B.H. 4' - 2.3 P.P.M.
- No. 6- B.H. 8' - 1.5 P.P.M.
- No. 7- B.H. 10' - 1.3 P.P.M.
- No. 8.- B.H. 8' - 1.5 P.P.M.
- No. 9- B.H. 5'- 0.01 P.P.M.



Map Not to Scale

APPENDIX ONE

Saga-Todd Pit  
5-04-01



Map Not to Scale

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

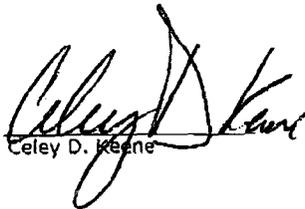
ALLSTATE SERVICES ENVIRONMENTAL  
ATTN: MR. RANDY OFFIELD  
P.O. BOX 11322  
MIDLAND, TEXAS 79702  
FAX: 682-4182

Sample Type: Soil  
Sample Condition: Intact/ Iced/ 4.0 deg C  
Project #: SAGA-Todd Pitt  
Project Name: None Given  
Project Location: Millsand, NM

Sampling Date: 05/04/01  
Receiving Date: 05/04/01  
Analysis Date: 05/29/01

ELT#	FIELD CODE	Chlorides mg/kg
40030	SAGA #1	224
40031	SAGA #1 BH 3'	331
40032	SAGA #2 BH 4'	510
40033	SAGA #2 SW 2'	2023
40034	SAGA #3 BH 4'	2072
40035	SAGA #4 BH 4'	13294
40036	SAGA #5 BH 4'	66.5
40037	SAGA #6 BH 8'	5388
40038	SAGA #7 BH 10'	4360
40039	SAGA #8 BH 6'	461
40040	SAGA #9 BH 5'	22.2
40041	SAGA #4A BH6'	8154
	Quality Control	5140
	True Value	5000
	% Precision	103
	Blank	<5

Methods: SW 846-9253

  
Celey D. Keene

05/29/01  
Date

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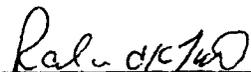
ALLSTATE SERVICES ENVIRONMENTAL  
ATTN: MR. BILLY SULLIVAN  
P.O. BOX 11322  
MIDLAND, TEXAS 79702  
FAX: 682-4182

Sample Type: Soil  
Sample Condition: Intact/Iced/ 4.0 deg C  
Project #: Saga-Todd Pitt  
Project Name: None Given  
Project Location: Millsand, N.M.

Sampling Date: 05/04/01  
Receiving Date: 05/04/01  
Analysis Date: 05/07/01

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg
40030	Saga #1	<100	11941
40031	Saga #1 BH 3'	<10	<10
40032	Saga #2 BH 4'	<10	<10
40033	Saga #2 SW 2'	<10	<10
40034	Saga #3 BH 4'	<10	<10
40035	Saga #4 BH 4'	<10	<10
40036	Saga #5 BH 4'	<10	<10
40037	Saga #6 BH 8'	<10	<10
40038	Saga #7 BH 10'	<10	<10
40039	Saga #8 BH 6'	<10	<10
40040	Saga #9 BH 5'	<10	<10
40041	Saga #4A BH 6'	<10	<10
	% IA	108	109
	%EA	97	95
	BLANK	<10	<10

Methods: EPA SW 846-8015M GRO/DRO

  
Raland K. Tuttle

5-8-01  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ALLSTATE SERVICES ENVIRONMENTAL  
ATTN: MR. BILLY SULLIVAN  
P.O. BOX 11322  
MIDLAND, TEXAS 79702  
FAX: 682-4182

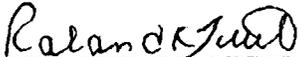
Sample Type: Soil  
Sample Condition: Intact/ Iced/ 4.0 deg. C  
Project #: Saga-Todd Pitt  
Project Name: None Given  
Project Location: Millsand, N.M.

Sampling Date: 05/04/01  
Receiving Date: 05/04/01  
Analysis Date: 05/04/01

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
40030	Saga #1	<0.025	<0.025	<0.025	<0.025	<0.025
40031	Saga #1 BH 3'	<0.025	<0.025	<0.025	<0.025	<0.025
40032	Saga #2 BH 4'	<0.025	<0.025	<0.025	<0.025	<0.025
40033	Saga #2 SW 2'	<0.025	<0.025	<0.025	<0.025	<0.025
40034	Saga #3 BH 4'	<0.025	<0.025	<0.025	<0.025	<0.025
40035	Saga #4 BH 4'	<0.025	<0.025	<0.025	<0.025	<0.025
40036	Saga #5 BH 4'	<0.025	<0.025	<0.025	<0.025	<0.025
40037	Saga #6 BH 8'	<0.025	<0.025	<0.025	<0.025	<0.025
40038	Saga #7 BH 10'	<0.025	<0.025	<0.025	<0.025	<0.025
40039	Saga #8 BH 6'	<0.025	<0.025	<0.025	<0.025	<0.025
40040	Saga #9 BH 5'	<0.025	<0.025	<0.025	<0.025	<0.025
40041	Saga #4A BH 6'	<0.025	<0.025	<0.025	<0.025	<0.025

%IA	92	93	96	103	95
%EA	90	93	94	104	97
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025

METHODS: EPA SW 846-8021B ,5030

  
Roland K. Tuttle

5-8-01  
Date





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5/1/01













Allstate  
Attn: Peggy  
FAX: 915 682-4182

5/25/2001

# **MATERIAL SAFETY DATA SHEET (MSDS) FOR PORTLAND CEMENT**

(Complies with OSHA's Hazard Communication Standard, 29 CFR 1910.1200)



**CEMEX, INC.  
ODESSA CEMENT PLANT  
P.O. BOX 1547  
ODESSA, TEXAS 79760**

**Section 1 - IDENTIFICATION**Supplier/Manufacturer

CEMEX, INC.  
Odessa Cement Plant  
P.O. Box 1547  
Odessa, Texas 79760

Emergency Contact Information

(915) 385-2800  
(800) 927-4838 (24-hour number)

Chemical name and synonyms

Portland Cement (CAS #65997-15-1)

Product name

"Southdown Type I"  
"Southdown Type I/II"  
"Southdown Type III"  
"Southdown Type V"  
"Southdown Class C" (Oil Well Cement)  
"Southdown Class H" (Oil Well Cement)  
"Southdown Class A" (Oil Well Cement)

Chemical family

Calcium salts.

Formula

3CaO.SiO <sub>2</sub>	(CAS #12168-85-3)
2CaO.SiO <sub>2</sub>	(CAS #10034-77-2)
3CaO.Al <sub>2</sub> O <sub>3</sub>	(CAS #12042-78-3)
4CaO..Al <sub>2</sub> O <sub>3</sub> Fe <sub>2</sub> O <sub>3</sub>	(CAS #12068-35-8)
CaSO <sub>2</sub> .2H <sub>2</sub> O	(CAS #13397-24-5)

Other salts:

Small amounts of MgO, and trace amounts of K<sub>2</sub>SO<sub>4</sub> and Na<sub>2</sub>SO<sub>4</sub> may also be present.

**Section 2 - COMPONENTS**Hazardous Ingredients

Portland cement clinker (CAS# 65997-15- 1) - approximately 93.5-96.0 % by weight  
ACGIH TLV-TWA (2000) = 10 mg total dust/m<sup>3</sup>  
OSHA PEL (8-hour TWA) = 50 million particles/ft<sup>3</sup>

Gypsum/Calcium Sulfate Dihydrate (CAS# 7778-18-9) - approximately - 4.0-6.5 % by weight  
ACGIH TLV-TWA (2000) = 10 mg total dust/m<sup>3</sup>  
OSHA PEL (8-hour TWA) = 15 mg total dust/m<sup>3</sup>  
OSHA PEL (8-hour TWA) = 5 mg respirable dust/m<sup>3</sup>

Respirable quartz (CAS# 14808-60-7) - approximately - 0.02-0.04 % by weight  
ACGIH TLV-TWA (2000) = 0.05 mg respirable quartz dust/m<sup>3</sup>  
OSHA PEL (8-hour TWA) = (10 mg respirable dust/m<sup>3</sup>)/(percent silica + 2)

Trace Ingredients

Trace amounts of naturally occurring chemicals might be detected during chemical analysis. Trace constituents may include up to 0.75% insoluble residue, some of which may be free crystalline silica, calcium oxide (Also known as lime or quick lime), magnesium oxide, potassium sulfate, sodium sulfate, chromium compounds, and nickel compounds.

**Section 3 - HAZARD IDENTIFICATION****Emergency Overview**

Portland cement is a light gray powder that poses little immediate hazard. A single short-term exposure to the dry powder is not likely to cause serious harm. However, exposure of sufficient duration to wet portland cement can cause serious, potentially irreversible tissue (skin or eye) destruction in the form of chemical (caustic) burns. The same type of tissue destruction can occur if wet or moist areas of the body are exposed for sufficient duration to dry portland cement.

**Potential Health Effects****Relevant Routes of Exposure:**

Eye contact, skin contact, inhalation, and ingestion.

**Effects Resulting from Eye Contact:**

Exposure to airborne dust may cause immediate or delayed irritation or inflammation. Eye contact by large amounts of dry powder or splashes of wet portland cement may cause effects ranging from moderate eye irritation to chemical burns or blindness. Such exposures require immediate first aid (see Section 4) and medical attention to prevent significant damage to the eye.

**Effects Resulting from Skin Contact:**

Discomfort or pain cannot be relied upon to alert a person to hazardous skin exposure. Consequently, the only effective means of avoiding skin injury or illness involves minimizing skin contact, particularly with wet cement. Exposed persons may not feel discomfort until hours after the exposure has ended and significant injury has occurred.

Dry portland cement contacting wet skin or exposure to moist or wet portland cement may cause more severe skin effects including thickening, cracking or fissuring of the skin. Prolonged exposure can cause severe skin damage in the form of (alkali) chemical burns.

Some individuals may exhibit an allergic response upon exposure to portland cement, possibly due to trace elements of chromium. The response may appear in a variety of forms ranging from a mild rash to severe skin ulcers. Persons already sensitized may react to their first contact with the product. Other persons may first experience this effect after years of contact with portland cement products.

**Effects Resulting from Inhalation:**

Portland cement may contain trace amounts of free crystalline silica. Prolonged exposure to respirable free silica can aggravate other lung conditions and cause silicosis, a disabling and potentially fatal lung disease.

Exposure to portland cement may cause irritation to the moist mucous membranes of the nose, throat, and upper respiratory system. It may also leave unpleasant deposits in the nose.

**Effects Resulting from Ingestion:**

Although small quantities of dust are not known to be harmful, ill effects are possible if larger quantities are consumed. Portland cement should not be eaten.

**Carcinogenic potential:**

Portland cement is **not** listed as a carcinogen by NTP, OSHA, or IARC. It may however, contain trace amounts of substances listed as carcinogens by these organizations.

Crystalline silica, a potential trace level contaminate in Portland cement, is now classified by IARC as known human carcinogen (Group I). NTP has characterized respirable silica as "reasonably anticipated to be [a] carcinogen".

**Medical conditions which may be aggravated by, inhalation or dermal exposure:**

Pre-existing upper respiratory and lung diseases.

Unusual (hyper) sensitivity to hexavalent chromium (chromium<sup>+6</sup>) salts.

**Section 4 - FIRST AID**

Eyes

Immediately flush eyes thoroughly with water. Continue flushing eye for at least 15 minutes, including under lids, to remove all particles. Call physician immediately.

Skin

Wash skin with cool water and pH-neutral soap or a mild detergent. Seek medical treatment in all cases of prolonged exposure to wet cement, cement mixtures, liquids from fresh cement products, or prolonged wet skin exposure to dry cement.

Inhalation of Airborne Dust

Remove to fresh air. Seek medical help if coughing and other symptoms do not subside.

Ingestion

Do not induce vomiting. If conscious, have the victim drink plenty of water and call a physician immediately.

**Section 5 - FIRE AND EXPLOSION DATA**

Flash point .....	None	Lower Explosive Limit.....	None
Upper Explosive Limit.....	None	Auto ignition temperature.....	Not Combustible
Extinguishing media.....	Not Combustible	Special fire fighting Procedures.....	None
Hazardous combustion products..	None	Unusual fire and explosion hazards...	None

**Section 6 - ACCIDENTAL RELEASE MEASURES**

Collect dry material using a scoop. Avoid actions that cause dust to become airborne. Avoid inhalation of dust and contact with skin.

Wear appropriate personal protective equipment as described in Section 8.

Scrape up wet material and place in an appropriate container. Allow the material to "dry" before disposal. Do not attempt to wash portland cement down drains.

Dispose of waste material according to local, state and federal regulations.

**Section 7 - HANDLING AND STORAGE**

Keep portland cement dry until used. Normal temperatures and pressures do not affect the material.

Promptly remove dusty clothing or clothing which is wet with cement fluids and launder before reuse. Wash thoroughly after exposure to dust or wet cement mixtures or fluids.

**Section 8 - EXPOSURE CONTROLS/PERSONAL PROTECTION**

Skin Protection

Prevention is essential to avoiding potentially severe skin injury. Avoid contact with unhardened portland cement. If contact occurs, promptly wash affected area with soap and water. Where prolonged exposure to unhardened portland cement products might occur, wear impervious clothing and gloves to eliminate skin contact. Wear sturdy boots that are impervious to water to eliminate foot and ankle exposure.

Do not rely on barrier creams: barrier creams should not be used in place of gloves.

Periodically wash areas contacted by dry portland cement or by wet cement or concrete fluids with a pH neutral soap. Wash again at the end of work. If irritation occurs, immediately wash the affected area and seek treatment. If clothing becomes saturated with wet concrete, it should be removed and replaced with clean dry clothing.

**Respiratory Protection**

Avoid actions that cause dust to become airborne. Use local or general exhaust ventilation to control exposures below applicable exposure limits.

Use NIOSH/MSHA approved (under 30 CFR 11) or NIOSH approved (under 42 CFR 84) respirators in poorly ventilated areas, if an applicable exposure limit is exceeded, or when dust causes discomfort or irritation. (Advisory: Respirators and filters purchased after June 10, 1998 must be certified under 42 CFR 84.)

**Ventilation**

Use local exhaust or general dilution ventilation to control exposure within applicable limits.

**Eye Protection**

Where potentially subject to splashes or puffs of cement, wear safety glasses with side shields or goggles. In extremely dusty environments and unpredictable environments wear unvented or indirectly vented goggles to avoid eye irritation or injury. Contact lenses should not be worn when working with portland cement or fresh cement products.

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**Section 9 - PHYSICAL AND CHEMICAL, PROPERTIES**

Appearance.....	Gray Powder	Odor.....	No distinct odor
Physical state.....	Solid (powder)	pH (in water).....	12 to 13
Solubility in water...	Slightly soluble (0.1 to 1.0%)	Vapor pressure.....	Not applicable
Vapor density.....	Not applicable	Boiling point.....	Not applicable (i.e., > 1000 C)
Melting point.....	Not applicable	Specific gravity (H2O = 1.0).....	3.15
Evaporation rate.....	Not applicable		

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**Section 10 - STABILITY AND REACTIVITY****Stability**

Stable.

**Conditions to avoid**

Unintentional contact with water.

**Incompatibility**

Wet Portland cement is alkaline. As such it is incompatible with acids, ammonium salts and phosphorous.

**Hazardous decomposition**

Will not spontaneously occur. Adding water produces (caustic) calcium hydroxide

**Hazardous Polymerization**

Will not occur.

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**Section 11 - TOXICOLOGICAL INFORMATION**

For a description of available, more detailed toxicological information contact the supplier or manufacturer.

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**Section 12 - ECOLOGICAL INFORMATION****Ecotoxicity**

No recognized unusual toxicity to plants or animals

**Relevant physical and chemical properties**

(See Sections 9 and 10.)

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**Section 13 - DISPOSAL**

Dispose of waste material according to local, state and federal regulations. (Since portland cement is stable, uncontaminated material may be saved for future use.

Dispose of bags in an approved landfill or incinerator.

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**Section 14 - TRANSPORTATION DATA****Hazardous materials description / proper shipping name**

Portland cement is not hazardous under U.S. Department of Transportation (DOT) regulations.

**Hazard class**

Not applicable

**Identification number**

Not applicable.

**Required label text**

Not applicable.

**Hazardous substances / reportable quantities (RQ)**

Not applicable.

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**Section 15 - OTHER REGULATORY INFORMATION****Status under USDOL-OSHA Hazard Communication Rule, 29 CFR 1910.1200**

Portland cement is considered a "hazardous chemical" under this regulation, and should be part of any hazard communication program.

**Status under CERCLA / SUPERFUND 40 CFR 117 and 302**

Not listed.

**Hazard Category under SARA (Title III), Sections 311 and 312**

Portland cement qualifies as a "hazardous substance" with delayed health effects.

**Status under SARA (Title III), Section 313**

Not subject to reporting requirements under Section 313.

**Status under TSCA (as of May 1997)**

Some substances in portland cement are on the TSCA inventory list.

**Status under the Federal Hazardous Substances Act**

Portland cement is a "hazardous substance" subject to statutes promulgated under the subject act.

**Status under California Proposition 65**

This product contains up to 0.05 percent of chemicals (trace elements) known to the State of California to cause cancer, birth defects or other reproductive harm. California law requires the manufacturer to give the above warning in the absence of definitive testing to prove that the defined risks do not exist.

**Section 16 - OTHER INFORMATION**Prepared by

Michael A. Tilton  
Manager - Health and Safety  
CEMEX, INC.  
Houston, Texas

Approval date or Revision date

August, 1997

Date of previous MSDS

Approved: March, 1991  
Revised: May, 2000  
Revised Name: April 2001

Other important information

Portland cement should only be used by knowledgeable persons. A key to using the product safely requires the user to recognize that portland cement chemically reacts with water, and that some of the intermediate products of this reaction (that is those present while a portland cement product is "setting") pose a more severe hazard than does dry portland cement itself.

While the information provided in this material safety data sheet is believed to provide a useful summary of the hazards of portland cement as it is commonly used, the sheet cannot anticipate and provide the all of the information that might be needed in every situation. Inexperienced product users should obtain proper training before using this product.

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In particular, the data furnished in this sheet do not address hazards that may be posed by other materials mixed with portland cement to produce portland cement products. Users should review other relevant material safety data sheets before working with this portland cement or working on portland cement products, for example, portland cement concrete.