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NMOCD

**PRELIMINARY SITE  
INVESTIGATION REPORT  
and  
REMEDIATION/CLOSURE  
PLAN**

*Eddy County* **Chi Operating, Inc.  
Shugart West 24 B Lease #5  
~~Lea County~~, New Mexico  
COI 08-02-1001**

30-015-32130

Prepared For:

Chi Operating, Inc.  
P.O. Box 1799  
Midland, Texas 79702

Prepared By:

Tripp Constuction, Inc.  
P.O. Box 1711  
Odessa, Texas 79760

**February 19, 2008**

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Mark Meadows  
Tripp Construction, Inc.

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## **1.0 Introduction and Summary**

Tripp Construction, Inc. (TCI), responded to a call from Chi Operating, Inc. (COI) concerning the Shugart West 24 B Tank Battery. This report details all the events pursuant to remediation of the site in such a manner that protects the population, environment, and groundwater in the area.

The site is characterized by mesquite growth and pasture utilized for cattle grazing. The visible surface stained areas are noted in the summary of field activities section.

TCI went to the location at the request of COI and found a chloride spill that had been excavated and the material had been removed from the location. The excavated area was analyzed for chloride levels and the results are shown in Attachment II.

The final confirmation samples show that no elevated chlorides are present and the excavation was back filled with new material.

## **2.0 Field Activities**

On February, 2008, TCI responded to the site located in <sup>Edley</sup> Lea County New Mexico under the direction of the Chi Operating personnel. The impacted area at the tank battery is northwest of the tanks in an area approximately thirty feet by eighteen feet by three feet deep (30' X 18' X 3'. Vertical and horizontal extent of the impacted area has been delineated. TCI obtained samples to delineate horizontal and vertical extent of contamination. All samples were analyzed in the field using Hach titrators and the two (2) confirmation samples were transported to Environmental Labs of Texas (ELOT) in Odessa, Texas. The excavation was backfilled and the contour of the tank area was returned to level.

## **3.0 Environmental x Media Characterization**

Chemical parameters of the soil will be characterized consistent with the characterization and remediation/ abatement goals and objectives set forth in OCD and BLM guidelines.

#### **4.0 Soil Investigation**

A total of eight (8) soil samples were collected and were analyzed in accordance with the following standard methods: six (6) for Chloride levels utilizing Hach titrators and two confirmation samples sent to Environmental Labs of Texas for Chloride. Soil sample number one was collected on the west wall of the excavation. Soil sample number two was collected on the east wall of the excavation. Soil sample number three was collected from the north wall of the excavation. Soil sample number four was collected from the south wall of the excavation. Soil sample number five was collected from the bottom of the excavation. Soil sample number six was collected north of the site as a background sample. The two confirmation samples are composite samples from the walls and bottom upon completion of the excavation (See Analytical Results – Attachment 2 and Site Maps – Attachment I).

#### **5.0 Conclusion and Basis for Site Closure Request**

On behalf of Chi Operating, Inc, we would like to request site closure on the basis of the analytical results associated with the February 22, 2008 sampling event and upon site clean-up efforts to date.

#### **6.0 Limitations**

Tripp Construction, Inc. (TCI) has prepared this Site Closure Report to the best of its ability. No other warranty, expresses or implied, is made or intended. TCI has examined and relied upon documents referenced in the report and had relied on oral statements made by certain individuals. TCI has not conducted an independent examination of the facts contained in referenced materials and statements. We have presumed the genuineness of the documents and that the information provided in documents or statements is true and accurate. TCI has prepared this report in a professional manner, using the degree of skill and care exercised by similar environmental consultants. TCI also notes that the facts and conditions referenced in this report may change over time and the conclusions and recommendations set forth herein are applicable only to the facts and conditions as described at the time of this report.

The report has been prepared for the benefit of Chi Operating, Inc. The information contained in this report including all exhibits and attachments, may not be used by any other party without the express consent of Tripp Construction, Inc., and Chi Operating, Inc.

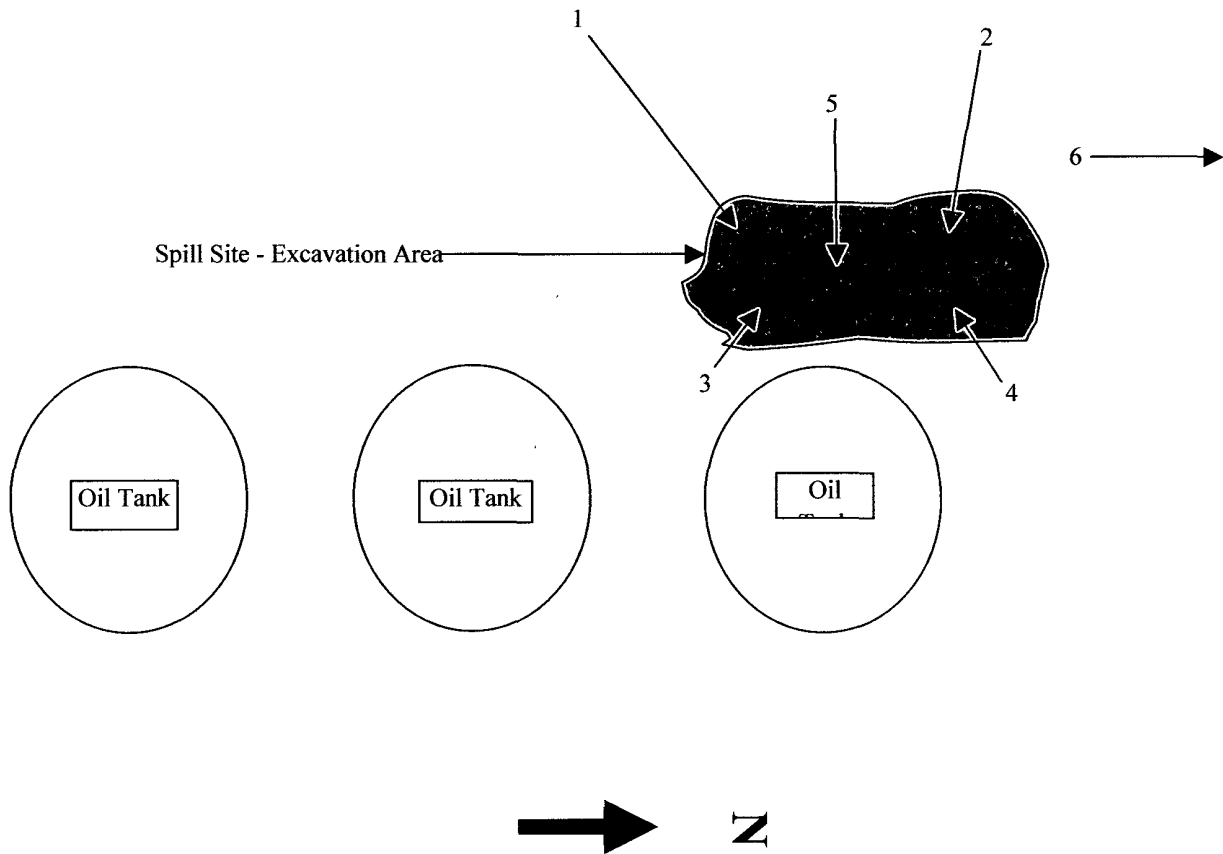
## **7.0 Distribution**

- Copy 1: Sonny Mann  
Chi Operating, Inc.  
P.O. Box 1799  
Midland, Texas 79702
- Copy 2: John Qualls  
Chi Operating, Inc.  
P.O. Box 1799  
Midland, Texas 79702
- Copy 3: Mike Bratcher  
New Mexico Oil Conservation Division
- Copy 4: Tripp Construction, Inc.  
Mark Meadows  
mmeadows@nwol.net

Chi Operating, Inc.  
Shugart West 24 B Tank Battery  
Soil Investigation Results and Site Closure Dated February 19, 2008

## **Attachment I**

### **Site Plan**



Chi Operating, Inc.  
Shugart West 24 B Tank Battery  
Soil Investigation Results and Site Closure Dated February 19, 2008

## **Attachment II**

### **Analytical Results**



# **Analytical Report 298185**

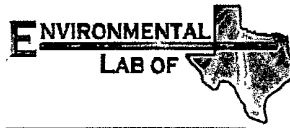
**for**

**Tripp Construction Co.**

**Project Manager: Mark Meadows**

**CEI Shugart**

**27-FEB-08**



**12600 West I-20 East Odessa, Texas 79765**

Texas certification numbers:  
Houston, TX T104704215

Florida certification numbers:  
Houston, TX E871002 - Miami, FL E86678 - Tampa, FL E86675  
Norcross(Atlanta), GA E87429

South Carolina certification numbers:  
Norcross(Atlanta), GA 98015

North Carolina certification numbers:  
Norcross(Atlanta), GA 483

Houston - Dallas - San Antonio - Austin - Tampa - Miami - Latin America  
Midland - Corpus Christi - Atlanta



27-FEB-08

Project Manager: **Mark Meadows**  
**Tripp Construction Co.**  
P.O. Box 1711  
Odessa, TX 79760

Reference: XENCO Report No: **298185**  
**CEI Shugart**  
Project Address: Loco Hills, NM

**Mark Meadows:**

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number 298185. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. Estimation of data uncertainty for this report is found in the quality control section of this report unless otherwise noted. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 298185 will be filed for 60 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

A handwritten signature in black ink, appearing to read "Brent Barron, II", written over a horizontal line.

**Brent Barron, II**  
Odessa Laboratory Manager

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*Certified and approved by numerous States and Agencies.*

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Houston - Dallas - San Antonio - Austin - Tampa - Miami - Atlanta - Corpus Christi - Latin America



## Sample Cross Reference 298185



Tripp Construction Co., Odessa, TX

CEI Shugart

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
CS-1	S	Feb-22-08 00:00		298185-001
CS-2	S	Feb-22-08 00:00		298185-002



# Certificate of Analysis Summary 298185

Tripp Construction Co., Odessa, TX

Project Name: CEI Shugart

Project Id:

Contact: Mark Meadows

Project Location: Loco Hills, NM

Date Received in Lab: Fri Feb-22-08 01:50 pm


Report Date: 27-FEB-08

Project Manager: Brent Barron, II

<b>Analysis Requested</b>	<b>Lab Id:</b>	298185-001	298185-002				
	<b>Field Id:</b>	CS-1	CS-2				
	<b>Depth:</b>						
	<b>Matrix:</b>	SOIL	SOIL				
<b>Determination of Inorganic Anions per Ion Chromatography by</b>	<b>Sampled:</b>	Feb-22-08 00:00	Feb-22-08 00:00				
	<b>Extracted:</b>						
	<b>Analyzed:</b>	Feb-26-08 08:28	Feb-26-08 08:28				
	<b>Units/RL:</b>	mg/kg RL	mg/kg RL				
Chloride		177 5.00	247 10.0				

This analytical report, and the entire data package it represents has been made for your exclusive and confidential use. The interpretations and results expressed throughout this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories assumes no responsibility and makes no warranty to the end use of the data hereby presented. Our liability is limited to the amount invoiced for this work order unless otherwise agreed to in writing.

Since 1990 Houston - Dallas - San Antonio - Austin - Tampa - Miami - Latin America - Atlanta - Corpus Christi

  
Brent Barron  
Odessa Laboratory Director



## Flagging Criteria

- X** In our quality control review of the data a QC deficiency was observed and flagged as noted. MS/MSD recoveries were found to be outside of the laboratory control limits due to possible matrix /chemical interference, or a concentration of target analyte high enough to effect the recovery of the spike concentration. This condition could also effect the relative percent difference in the MS/MSD.
- B** A target analyte or common laboratory contaminant was identified in the method blank. Its presence indicates possible field or laboratory contamination.
- D** The sample(s) were diluted due to targets detected over the highest point of the calibration curve, or due to matrix interference. Dilution factors are included in the final results. The result is from a diluted sample.
- E** The data exceeds the upper calibration limit; therefore, the concentration is reported as estimated.
- F** RPD exceeded lab control limits.
- J** The target analyte was positively identified below the MQL(PQL) and above the SQL(MDL).
- U** Analyte was not detected.
- L** The LCS data for this analytical batch was reported below the laboratory control limits for this analyte. The department supervisor and QA Director reviewed data. The samples were either reanalyzed or flagged as estimated concentrations.
- H** The LCS data for this analytical batch was reported above the laboratory control limits. Supporting QC Data were reviewed by the Department Supervisor and QA Director. Data were determined to be valid for reporting.
- K** Sample analyzed outside of recommended hold time.

\* Outside XENCO'S scope of NELAC Accreditation

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5757 NW 158th St, Miami Lakes, FL 33014  
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(210) 509-3334	(210) 509-3335
(813) 620-2000	(813) 620-2033
(305) 823-8500	(305) 823-8555
(770) 449-8800	(770) 449-5477



# Blank Spike Recovery



Project Name: CEI Shugart

Work Order #: 298185

Project ID:

Lab Batch #: 715635

Sample: 715635-1-BKS

Matrix: Solid

Date Analyzed: 02/26/2008

Date Prepared: 02/26/2008

Analyst: IRO

Reporting Units: mg/kg

Batch #: 1

## BLANK /BLANK SPIKE RECOVERY STUDY

Determination of Inorganic Anions per Ion Chro	Blank Result [A]	Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Control Limits %R	Flags
Analytes						
Chloride	ND	100	9.64	96	75-125	

Blank Spike Recovery [D] =  $100 * [C] / [B]$

All results are based on MDL and validated for QC purposes



# Form 3 - MS Recoveries



Project Name: CEI Shugart

Work Order #: 298185

Lab Batch #: 715635

Date Analyzed: 02/26/2008

QC- Sample ID: 298154-009 S

Reporting Units: mg/kg

Project ID:

Analyst: IRO

Date Prepared: 02/26/2008

Batch #: 1

Matrix: Soil

## MATRIX / MATRIX SPIKE RECOVERY STUDY

Inorganic Anions by EPA 300  Analytes	Parent Sample Result [A]	Spike Added [B]	Spiked Sample Result [C]	%R [D]	Control Limits %R	Flag
Chloride	5330	2000	7690	118	75-125	

Matrix Spike Percent Recovery [D] =  $100 \cdot (C-A)/B$

Relative Percent Difference [E] =  $200 \cdot (C-A)/(C+B)$

All Results are based on MDL and Validated for QC Purposes



## Sample Duplicate Recovery



Project Name: CEI Shugart

Work Order #: 298185

Lab Batch #: 715635

Date Analyzed: 02/26/2008

QC- Sample ID: 298154-009 D

Reporting Units: mg/kg

Date Prepared: 02/26/2008

Batch #: 1

Project ID:

Analyst: IRO

Matrix: Soil

SAMPLE / SAMPLE DUPLICATE RECOVERY					
Determination of Inorganic Anions per Ion Chromatography by Analyte	Parent Sample Result [A]	Sample Duplicate Result [B]	RPD	Control Limits %RPD	Flag
Chloride	5330	5060	5	20	

Spike Relative Difference RPD  $200 * |(B-A)/(B+A)|$

All Results are based on MDL and validated for QC purposes.



# Environmental Lab of Texas

A Xenco Laboratories Company

## CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

12600 West I-20 East  
Odessa, Texas 79785

Phone: 432-563-1800  
Fax: 432-563-1713

Project Manager: Mark Meadows  
Company Name: Tripp Construction, Inc.  
Company Address: P.O. Box 1711  
City/State/Zip: Odessa, Texas 79760  
Telephone No: 432-381-2440  
Fax No: 432-530-3107  
e-mail: mmeadows@nwl.net

Project Name: CEI Shugart  
Project #: \_\_\_\_\_  
Project Loc: Loce Hills, NM  
PO #: \_\_\_\_\_

Report Format: ☒ Standard ☐ TRRP ☐ NPDES

(lab use only)

ORDER #: 298185

ORDER #: 298183																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
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Special Instructions:

Relinquished by: <u>Nickolas</u>	Date: <u>2-22-04</u>	Time: <u>1:50</u>	Received by:	Date:	Time:	Laboratory Comments: Sample Containers Intact? <u>Y</u> VOCs Free of Headspace? <u>Y</u> Labels on container(s) <u>Y</u> Custody seals on container(s) <u>Y</u> Custody seals on cooler(s) <u>Y</u> Sample Hand Delivered by Sampler/Client Rep? <u>Y</u> by Courier? <u>UPS</u> Temperature Upon Receipt: <u>26.0 °C</u>	
Relinquished by:	Date:	Time:	Received by:	Date:	Time:		
Relinquished by:	Date:	Time:	Received by ELOT: <u>Andrea Lamm</u>	Date: <u>2-22-03</u>	Time: <u>1:50</u>		

**Environmental Lab of Texas**  
Variance/ Corrective Action Report- Sample Log-In

Client Tripp Const.  
Date/ Time 2.22.08 1:50  
Lab ID # 298185  
Initials al

**Sample Receipt Checklist**

				Client Initials	
#1	Temperature of container/ cooler?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	26.0 °C	
#2	Shipping container in good condition?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		
#3	Custody Seals intact on shipping container/ cooler?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<del>Not Present</del>	
#4	Custody Seals intact on sample bottles/ container?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<del>Not Present</del>	
#5	Chain of Custody present?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		
#6	Sample instructions complete of Chain of Custody?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		
#7	Chain of Custody signed when relinquished/ received?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		
#8	Chain of Custody agrees with sample label(s)?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	ID written on Cont / Lid	
#9	Container label(s) legible and intact?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Not Applicable	
#10	Sample matrix/ properties agree with Chain of Custody?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		
#11	Containers supplied by ELDT?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		
#12	Samples in proper container/ bottle?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	See Below	
#13	Samples properly preserved?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	See Below	
#14	Sample bottles intact?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		
#15	Preservations documented on Chain of Custody?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		
#16	Containers documented on Chain of Custody?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		
#17	Sufficient sample amount for indicated test(s)?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	See Below	
#18	All samples received within sufficient hold time?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	See Below	
#19	Subcontract of sample(s)?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<del>Not Applicable</del>	
#20	VOC samples have zero headspace?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<del>Not Applicable</del>	

**Variance Documentation**

Contact \_\_\_\_\_ Contacted by \_\_\_\_\_ Date/ Time \_\_\_\_\_

Regarding \_\_\_\_\_

Corrective Action Taken:

Check all that Apply.

- ☐ See attached e-mail/ fax  
☐ Client understands and would like to proceed with analysis  
☐ Cooling process had begun shortly after sampling event

Environmental Lab of Texas

Variance/ Corrective Action Report- Sample Log-In

Client Tripp Const.  
Date/ Time 2.22.08 1:50  
Lab ID # 298185  
Initials cu

Chi Operating, Inc.  
Shugart West 24 B Tank Battery  
Soil Investigation Results and Site Closure Dated February 19, 2008

## **Attachment III**

### **Photos**

