<u>District I</u> 1625 N. French Dr., H District II	Hobbs, NN	4 88240		NE Ene	St ergy Mi	ate of nerals	f New Mex	al Resources			Re		Form C-1 ctober 10, 2
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FGRL1011638154

LETTER OF TRANSMITTAL

RECEIVED

APR 14 2010 HOBBSOCD



Date:	April 13, 2010
To:	Mr. Geoffrey Leking
Company Name:	New Mexico Oil Conservation Division
Address:	1625 North French Drive
City / State / Zip:	Hobbs, New Mexico 88240
From:	David P. Duncan
CC:	Ms. Becky Moore, Compliance Coordinator – Centurion Pipeline, L.P.
Project #:	EPI Ref. #255016
Project Name:	Brahaney Gathering System
Subject:	Remediation Proposal

# of originals	# of copies	Description
1		Remediation Proposal – Brahaney Gathering System

Remarks

Dear Mr. Leking:

Enclosed is a bound copy of a *Remediation Proposal* for the above referenced site. Upon NMOCD approval, EPI will complete remedial phase of the project. Should you have any technical questions, concerns or need additional information, please contact me at (575) 394-3481 (office), (575) 441-7802 (cellular) or via email at dduncanepi@gmail.com Official communications/correspondence should be directed to Ms. Becky Moore, Compliance Coordinator, at (432) 686-6805 (office) or via e-mail at Rebecca_Moore@oxy.com.

Sincerely,

David P. Duncan Civil Engineer EPI Project Manager

> P. O. Box 1558 Eunice, NM 88231 (575) 394-3481 Fax: (575) 394-2601

REMEDIATION PROPOSAL

BRAHANEY GATHERING SYSTEM EPI Ref: #255016

UL-D (NW¹/4 OF THE NW¹/4) OF SECTION 04, T 13 S, R 38 E ~12 MILES EAST BY SOUTHEAST OF TATUM,

LATITUDE: N 33° 13' 28.83" LONGITUDE: W 103° 06' 36.37"

LEA COUNTY, NEW MEXICO

APRIL 2010

PREPARED BY.

ENVIRONMENTAL PLUS, INC. P.O. BOX 1558 2100 WEST AVENUE O EUNICE, NEW MEXICO 88231

RECEIVED

APR 14 2010 HOBBSOCD

PREPARED FOR:

CENTURION PIPELINE, L.P.

6 DESTA DRIVE, SUITE 5050

P.O. Box 51790

MIDLAND, TEXAS 79710

	ENVERONMENTAL P	JUS, INC.	
.4.	CONSULTING AND ENVIRONMEN	NTAL REMEDIATION	。 ()
Enviro New M 1625 N	offrey Leking nmental Engineer Iexico Oil Conservation Division Iorth French Drive New Mexico 88240	APR 14 2000 HOBBSUUL	
	Remediation Proposal Centurion Pipeline, L.P. – Brahaney UL-D (NW ¼ of the NW ¼) of Secti Longitude: N 33º 13' 28.83"; Latitu Lea County, New Mexico	y Gathering System Release Area on 04, T 13 S, R 38 E	

Mr. Leking:

EPI Ref. #255016

On April 06, 2010 approximately 150 barrels of sweet crude oil were released from a corroded eight (8) inch diameter steel pipeline covering an area of approximately 39,300 square feet of grazing land. After initiating a One Call the same day, Environmental Plus, Inc., (EPI) arrived at the release site and commenced emergency remediation activities. Prior to EPI arrival, the pipeline had been immediately deactivated by Centurion Pipeline, L.P., personnel. Vacuum trucks removed approximately 120 barrels of sweet crude oil and transported the fluid to a Centurion Pipeline, L.P. tank battery for reclamation. A repair clamp was placed around the leak and the pipeline returned to service. This letter report documents results of delineation and preliminary remediation activities while providing a *Remediation Proposal*.

Site Background

The Site is located in UL-D (NW ¼ of the NW ¼) of Section 04, T 13 S, R 38 E at an approximate elevation of 3829 feet above mean sea level (amsl). The property is owned by Robert Sledge, 3141 Chimney, Abilene, Texas. A search for water wells was completed utilizing the New Mexico Office of the State Engineers website and a database maintained by the United States Geological Survey (USGS). One (1) well and no surface water features exist within a 1,000 feet radius of the Site (reference Figure 2). Groundwater data indicates average water depth is approximately 50 feet below ground surface (bgs). Based on available information, projected distance between impacted soil and groundwater is approximately 49 vertical feet. Utilizing this information, New Mexico Oil Conservation Division (NMOCD) Remedial Goals for this Site were determined as follows:

	P	arameter	Reme	lial Goal	
	H	Benzene 10 parts per million		on	
		BTEX	50 parts	per millio	on
		TPH	100 parts	per milli	on
			nay not be capa e NMWQCC S		
P O. BOX 1558	•••	2100 A V	ENUE O	•••	EUNICE, NEW MEXICO 88231

Format ГÌ 2 -----



Field Work

On April 06, 2010 EPI mobilized to an Emergency Response and started preventative remediation activities within the release area. Following natural slope of the ground, the crude sweet oil created a release area on the east side of pipeline ROW. After containment and removal of sweet crude oil, the steel pipeline was repaired and returned to service. From April 06-09, 2010 soil contaminated with petroleum products was scrapped from the ground, blended with existing soil and stockpiled within the release area. This procedure was necessary as it afforded an opportunity for aeration and drying while decreasing chances of deeper penetration of crude sweet oil products into the ground. Due to concerns about changing weather conditions, the stockpiled blended material is being transported to a state approved landfill for reclamation.

On 9 April, 2010 the existing steel pipeline was replaced with approximately 300-linear feet of eight (8) inch diameter tar coated and wrapped steel piping.

Soil samples were collected and analyzed in the field for TPH concentrations utilizing a Photoionization Detector (PID) calibrated for benzene detection. Due to the release being sweet crude oil, no field analyses were conducted for chloride concentrations.

Analytical Data

Field analyses of two (2) soil samples collected on April 07, 2010 indicate TPH concentrations below NMOCD Remedial Threshold Goals of 100 mg/Kg (reference *Figure #4* for locations). Similarly, analyses results indicate depth of impacted material is approximately six (6) to twelve (12) inches.

Table 2, *Summary of Soil Sample Field Analyses and Laboratory Analytical Results*, list the values of the field analyses results.

Site Remedial Proposal

EPI proposes continuing delineation of the release area via use of a backhoe or track hoe. Surface area and depth of excavation will be determined by extent of impacted material. Sidewalls and bottom of the excavation will be field analyzed primarily for TPH concentrations interspersed with random tests for chloride concentrations. Extreme care will be exerted when excavating or backfilling around the recently installed coated steel pipeline. Upon satisfactory field analyses results, soil samples collected will be sent to an independent laboratory for analytical verification of BTEX, TPH and chloride concentrations. With receipt of laboratory analytical results indicating sidewalls and bottom of excavation are below NMOCD parameters for BTEX, TPH and chloride concentrations, EPI will complete remedial activities. Impacted material is being transported to Environmental Plus, Inc., Landfarm (Permit No. NM-01-0013) for reclamation.

Following completion of excavation activities and disposal of impacted material, the excavation will be backfilled. As most of the excavation is in grazing areas, the excavation will be backfilled from bottom to original ground surface with clean top soil. Top soil procured from a nearby source will be free of rocks, large clumps and deleterious material.

The entire disturbed area is to be contoured to allow natural drainage and prevent wind/water erosion. These areas will be disked and drill seeded with a mixture approved by the property owner.

Upon approval of the *Remediation Proposal*, EPI will finalize remedial phase of the project. At conclusion of the project, a *Site Closure Report* will be submitted to NMOCD, Centurion Pipeline, L.P. and property owner.

Should you have any technical questions or concerns, please contact me at (575) 394-3481 (office), (575) 441-7802 (mobile) or via email at dduncanepi@gmail.com.

Official communications should be directed to Ms. Becky Moore, Compliance Coordinator, at (432) 686-6805 (office) or via email at Rebecca_Moore@oxy.com with correspondence addressed to:

Ms. Becky Moore Compliance Coordinator Centurion Pipeline, L.P. 6 Desta Drive, Ste. 5050 P.O. Box 51790 Midland, Texas 79710

Sincerely,

ENVIRONMENTAL PLUS, INC.,

David P. Duncan Civil Engineer

Cc: Ms. Becky Moore, Compliance Coordinator – Centurion Pipeline, L.P. Cody Miller, General Manager - EPI Roger Boone, Operations Superintendent - EPI

Encl: Figure 1 – Area Map

Figure 2 – Site Location Map

Figure 3 – Site Map

Figure 4 – Soil Sample Locations

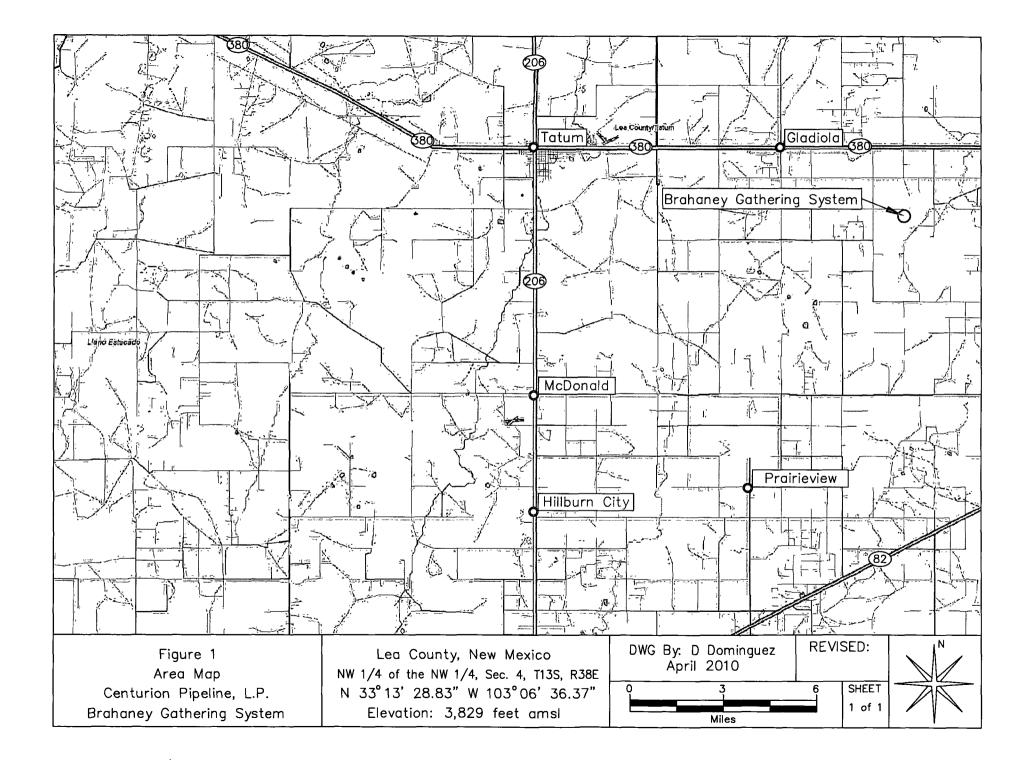
Table 1 – Well Data

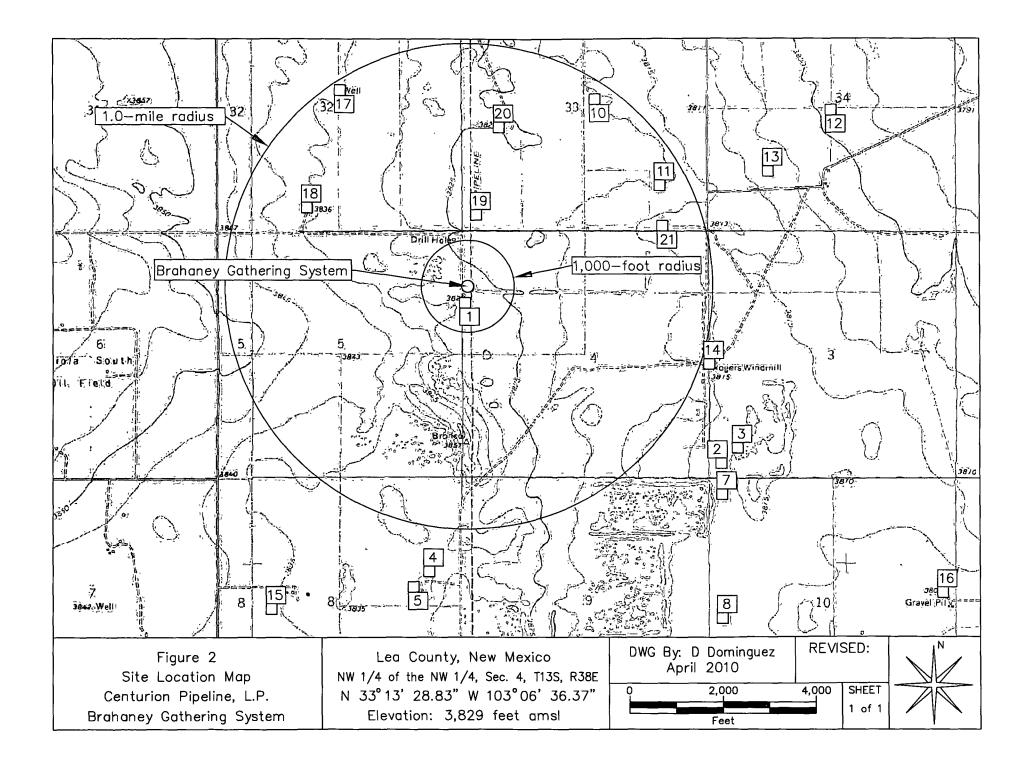
Table 2 – Summary of Excavation Soil Sample Field Analysis and Laboratory Analytical Results

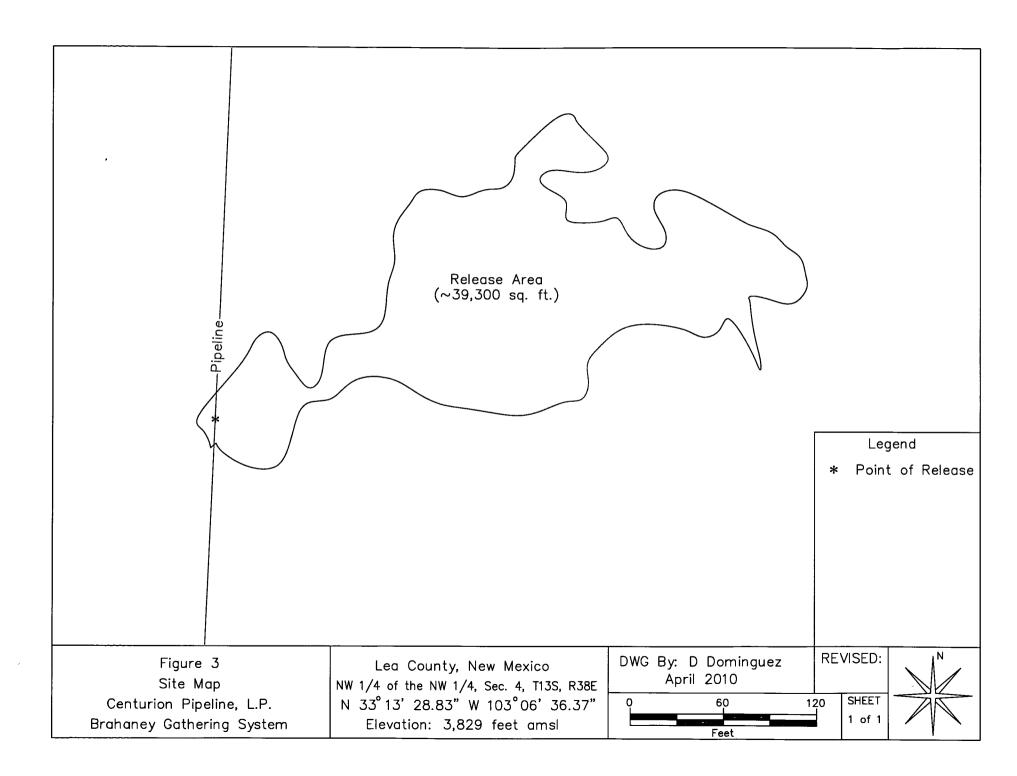
Attachment I – Site Photographs

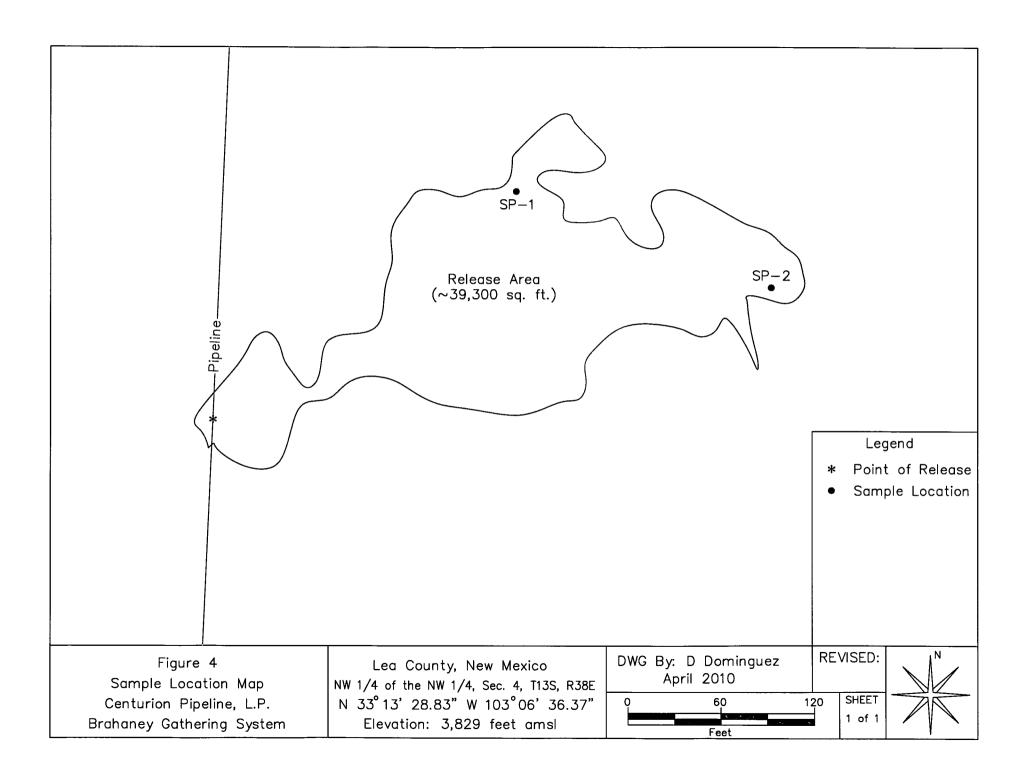
Attachment II - Copy of Initial NMOCD Form C-141

FIGURES









TABLES

TABLE 1

<u>Well_Data</u>

Centurion Pipeline - Brahaney Gathering System (EPI Ref. # 255016)

Ref. #	Well Number	Diversion ^A	Owner	Use	Twsp	Rng	Sec	q4	q16	q64	Latitude	Longitude	Date Measured	Surface Elevation ^B	Depth to Water (ft bgs)
1	USGS #1				135	38E	4	1	3	1			28-Mar-91	3,829	48 41
2	L 02807	3	ELMO TEAGUE	PRO	13S	38E	3	3	3	_3	N33° 12' 51 37"	W103° 05' 32 57"	14-May-55	3,814	31
3	L 11094	3	PERL H HARRIS	STK	13S	38E	3	3	3		N33° 12' 54.58"	W103° 05' 28.60"	03-Sep-00	3,814	_90
4	L 02853	3	RAYMOND C. KORNEGAY	DOM	13S	38E	8	2	4		N33° 12' 28.44"	W103° 06' 46.33"	_	3,835	60
5	L 11669	3	WESLEY D. HARRIS	DOM	_13S	38E	8	2	4	3	N33° 12' 25.22"	W103° 06' 50.30"	05-Apr-05	3,835	100
7	L 00341 A S 2				135	38E	10	1_	1	1	N33° 12' 44.81"	W103° 05' 32.45"	30-Mar-04	3,814	100
8	L 00341 A S 3				13S	38E	10	3	1	1	N33° 12' 18.70"	W103° 05' 32.43"	08-Apr-04	3,814	100
10	L 01462 APPRO	3	EUGENE HODGE	DOM	12S	38E	33	2	3	3	N33° 14' 9 79"	W103° 06' 3.55"	12-Jun-52	3,820	32
11	L 10370	3	LARRY HODGE	DOM	12S	38E	33	4	4	1	N33° 13' 50.20"	W103° 05' 47.87"	30-Dec-93	3,820	36
12	L 06873		P. H HARRIS	DOM	12S	38E	34				N33° 14' 6.16"	W103° 05' 4 76"	13-Dec-71	3,799	42
13	L 10830	3	PEARL HARRIS	DOM	125	38E	34	3			N33° 13' 53 35"	W103° 05' 20 57"	21-Jun-99	3,807	45
14	USGS #2				13S	38E	3	3	1	1			13-Mar-91	3,815	54.06
15	USGS #3				13S	38E	8	3	1	2			03-Jan-96	3,835	70 11
16	USGS #4				13S	38E	10	2	4	4			15-Feb-66	3,808	68.67
17	USGS #5				12S	38E	32	2	3	3		·	06-Feb-91	3,835	29 98
18	USGS #6				12S	38E	32	3	4	4			17-Mar-71	3,836	36.71
19	USGS #7				12S	38E	33	3	3	3			17-Mar-71	3,824	46 81
20	USGS #8				125	38E	33	3	1	2			17-Mar-71	3,825	31.99
21	USGS #9				12S	38E	33	4	4	3			07-Feb-91	3,814	37.21
6	L 11925 POD1	-		-	13S-	38E	9	3	+ 3	1	33° 12' 5.60"	W103° 06' 34.58"	09-Jun-06	3,827	105
9	L 02952	~ 3	L.B. TOWNSEND	DOM	"13S	38E	10	4	P 4	,	N33° 12', 2.41"	W103° 04' 42.08"	30-Jul-55	-3,805	_65

* = Data obtained from the New Mexico Office of the State Engineer Website (http://nmwrrs ose.state.nm.us/nmwrrs/wellSurfaceDiversion.html) and USGS Database

 A = In acre feet per annum

^B = Elevation interpolated from USGS topographical map based on referenced location

PRO = 72-12-1 Prospecting or development of natural resource

DOM = 72-12-1 Domestic one household

STK = 72-12-1 Livestock watering

quarters are 1=NW, 2=NE, 3=SW, 4=SE; quarters are biggest to smallest

Shaded area indicates wells not shown in Figure 2

TABLE 2
Summary of Excavation Soil Sample Field Analyses and Laboratory Analytical Results

Centurion Pipeline, L.P.

Project: Brahaney Gathering System (EPI Ref. #255016)

Sample I D	Depth (feet)	Soil Status	Sample Date	PID Field Analysis (ppm)	Field Chloride Analyses (mg/Kg)	Benzene (mg/Kg)	Toluene (mg/Kg)	Ethylbenzene (mg/Kg)	Total Xylenes (mg/Kg)	Total BTEX (mg/Kg)	GR11 (C6-C10) (mg/Kg)	DR11 (>C10-C28) (mg/Kg)	Total Petroleum Hydrocarbons (C6-C28) (mg/Kg)	Chloride (mg/Kg)
B11-1	10	In situ	6-Apr-10	34 9										
B11-2	0 5	In situ	06-Apr-10	59										
			<u> </u>											
					,									
					, <u> </u>									
								 					<u> </u>	
· · · · · · · · · · · · · · · · · · ·	 							 						
NMOC	D Remedial	Threshold Goa	als	100		10				50			100	250

.

Bolded values are in excess of NMOCD Remediation Threshold Goals -- = Not Analyzed, N/A = Not Applicable ND - Nondetectable SW = Soil samples collected from side walls, BH = Soil samples collected from bottom of excavation

ATTACHMENTS

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ATTACHMENT I PHOTOGRAPHS

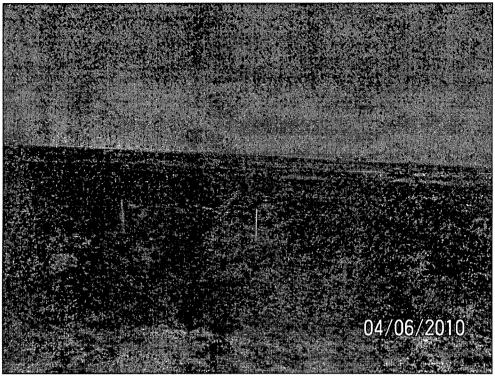
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Photograph No. 1 – Looking northerly at point of release



Photograph No. 2 – Looking southwesterly at free standing sweet crude oil

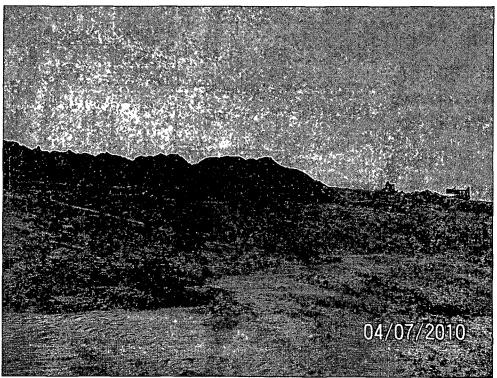


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Photograph No. 3 – Looking northerly at sweet crude oil following a trail



Photograph No. 4 – Looking southerly at free standing sweet crude oil near point of release



Photograph No. 5 – Looking at stockpiled blended impacted material and ROW excavation



Photograph No. 6 – Looking at stockpiled blended impacted material

ATTACHMENT II COPY OF INITIAL NMOCD FORM C-141

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State of New Mexico Energy Minerals and Natural Resided EIVED

Oil Conservation DivisionAPR 14 2010 1220 South St. Francis Dr Santa Fe, NM 87505 HOBBSOCD Form C-141 Revised October 10, 2003

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

Release	Notification	and	Corrective A	Action

	OPERATOR	Initial Report	Final Report
Name of Company Centurion Pipeline, LP	Contact Becky Moore, Corr	pliance Coordinator	
Address P.O. Box 51790, Midland, TX 79710	Telephone No. 432-686-680)5	
Facility Name Brahaney Gathering System	Facility Type Sweet Crude	Oil Pipeline	

Surface Owner Robert Sledge

Mineral Owner

Lease No.

LOCATION OF RELEASE

Unit Letter D	Section 04	Township 13-S	Range 38-E	Feet from the	North/South Line	Feet from the	East/West Line	County Lea

Latitude N33° 13' 28.83" Longitude W 103° 06' 36.37"

NATURE OF RELEASE									
Type of Release Sweet Crude Oil	Volume of Release 150 bbls	Volume Recovered 120 bbls							
Source of Release 8" dia. Steel transmission pipeline	Date and Hour of Occurrence	Date and Hour of Discovery							
	04/06/10 – hour unknown 4/6/10 @ 11:50 AM								
Was Immediate Notice Given?	If YES, To Whom?								
Yes 🗌 No 🗌 Not Required	Geoffrey Leking – left voice mail r	nessage and verbal.							
By Whom? Becky Moore (left message)	Date and Hour 04/07/10 @ 10:30.	AM (message) and @ 2:20 PM (verbal)							
Was a Watercourse Reached?	If YES, Volume Impacting the Wa	tercourse.							
🗌 Yes 🖾 No	N/A								
If a Watercourse was Impacted, Describe Fully.* Not Applicable									
Describe Cause of Problem and Remedial Action Taken.* Corrosion cau	sed a leak on the 8" Brahanev Gatheri	ng System. Emergency Action response							
included immediate shut-in of the pipeline to stop the leak and a repair cl									
contacted to assist with initial emergency response and to initiate clean u									
secured from run off after free liquids were removed. Affected soil is be									
determine appropriate clean up actions.									
Describe Area Affected and Cleanup Action Taken.* Area affected at th									
contaminated soil is currently being excavated and stockpiled at the site.									
be 100 ppm. The affected pipeline is in process of being replaced with 3									
approved and the clean up is complete, a final C-141 will be submitted and	ad accompanied with a final report inc	luding lab analysis, pictures, and all							
associated closure documentation as required.									
I hereby certify that the information given above is true and complete to									
regulations all operators are required to report and/or file certain release r public health or the environment. The acceptance of a C-141 report by the									
should their operations have failed to adequately investigate and remedia									
or the environment. In addition, NMOCD acceptance of a C-141 report of									
federal, state, or local laws and/or regulations.	loca not reneve the operator of respon	sionity for comphance with any other							
	OIL CONSERV	VATION DIVISION							
Signature:	<u></u>								
Signature:	- ¹ *								
	Approved by District Supervisor:								
Printed Name: Becky Moore									
Title: Compliance Coordinator	Expiration Date:								
	Approval Date:	Expiration Date.							
E-mail Address: Rebecca_Moore@oxy.com	Conditions of Approval:								
		Attached							
Date: 04/07/10 Phone: (432) 686-6805 (office)									
Attach Additional Sharts If Nacassany									

* Attach Additional Sheets If Necessary