IRP-211
10.25.05

Clay Cooper #11 Closure Report
Duke Energy Field Services
Lea County, New Mexico

AUGUST 7, 2002

Prepared For:

Duke Energy Field Services
P. O. Box 5493
Denver, CO 80217

Site Name:

CLAY COOPER #11 (CC#11)

Site Location:

T20S, R36 E, SECTION 25, UNIT D

Prepared By:

PO Box 7624
Midland, Texas 79708

TRIDENT ENVIRONMENTAL

August 7, 2002

Mr. Steve Weathers
Duke Energy Field Services, LP
P. O. Box 5493
Denver, Colorado 80217

Re: Removal of Hydrocarbon-Impacted Soils from the CC #11 site
Township 20 South, Range 36 East, Section 25, Unit D

Dear Mr. Weathers:

Trident Environmental (Trident) was retained by Duke Energy Field Services, LP (DEFS) to oversee the removal of hydrocarbon-impacted soil from an area along a pipeline right-of-way operated by DEFS approximately 3 miles south-southwest of Monument, New Mexico in Lea County. The site (CC #11) is located in Section 25 (Unit D), Township 20 South, Range 36 East on property owned by Dale Cooper and managed by Clay Cooper. The location of the CC #11 site is shown on the topographic map in Attachment A. The work was conducted in accordance with the work plan submitted to the New Mexico Oil Conservation Division (OCD). Trident personnel periodically collected soil samples to characterize the extent of hydrocarbon-impact and to verify when cleanup target levels had been achieved. This letter report describes the methods and results of the excavation, sampling, waste disposition, and backfilling operations for documentation that closure requirements have been satisfied.

Excavation and Sampling Procedures

Walton Construction Company, Inc. (Hobbs, New Mexico) performed excavation. Walton Construction used one trackhoe, one dozer, one loader, and 12 yd^3 dump trucks for earthmoving services. An area was excavated where Mr. Cooper identified indications of hydrocarbon-impacted soils. During excavation operations, subsurface soil samples were collected and submitted to an analytical laboratory to characterize the approximate lateral and vertical extent of hydrocarbon-impacted soil in each area. Samples were collected by Trident with stainless steel trowels. Grab samples were collected from the floor and walls (north, south, east, and west), as specified in the site data form in Attachment A. During the course of excavation activities, samples were also collected for headspace analysis using an organic vapor meter (OVM), which was calibrated to assume a benzene response factor. All soil sampling, headspace analysis, and laboratory analysis were performed in accordance with OCD *"Guidelines for Remediation of Leaks, Spills, and Releases"* (August 13, 1993). Excavation operations were completed when laboratory analysis of collected samples indicated the extent of hydrocarbon-impacted soils remaining in the excavation were below the following concentrations:

- 100 milligrams per kilogram (mg/kg) of total petroleum hydrocarbons (TPH),
- 10 mg/kg benzene,
- 50 mg/kg total benzene, toluene, ethylbenzene, and xylenes (BTEX)

Soil samples were submitted to Environmental Laboratory of Texas (Odessa, Texas) and analyzed for gas and diesel range organics (GRO and DRO) using EPA Method 8015 to determine TPH concentrations. BTEX analyses were conducted only for the soil samples with OVM, GRO, and/or DRO concentrations exceeding 100 ppm.

Soil Stockpiling, Waste Disposition, and Backfilling

An effort to segregate clean versus impacted soil during excavation was made. Only hydrocarbon-impacted soil that exceeded 100 mg/kg GRO/DRO, 10 mg/kg benzene, and/or 50 mg/kg total BTEX was transported to the South Monument Landfarm. These target cleanup levels are based on the ranking criteria in the OCD *"Guidelines for Remediation of Leaks, Spills, and Releases"*. A total ranking score of greater than 19 points was assumed since groundwater is less than 50 feet below ground surface based on landowner's claims and well records from the Office of the State Engineer.

Approximately 252 cubic yards of hydrocarbon-impacted soils were transported by Walton Construction to cell C-5 at the South Monument Landfarm, which is owned and operated by Ms. Kena Kay Cooper (OCD Rule 711 Permit Approval NM-01-0032). A completed *Release Notification and Corrective Action* (C-141) form is included in Attachment A.

Excavated soils below the remediation action levels and as agreed upon by Mr. Cooper were returned to the excavation after sampling and analysis verification. Also, native soil from adjacent sand dunes in the area was provided by Mr. Cooper and used as additional backfill in the excavation to restore the excavation to a level grade.

Results

At the completion of excavation activities all areas had petroleum hydrocarbon concentrations below the OCD standards listed above. Soil sample locations are depicted on the Site Map in Attachment A. A summary of the analytical results and photo documentation are also provided in Attachment A. Laboratory analytical reports, and chain-of-custody documentation for the samples collected are provided in Attachment B. Copies of the field logbook are in Attachment C.

Sincerely,

Gilbert J. Van Deventer, REM
Project Manager

Attachments

cc: Clay Cooper, landowner – Hobbs, NM

C:DEFS\COOPER\CC11\CC11CLOSE.DOC

ATTACHMENT A

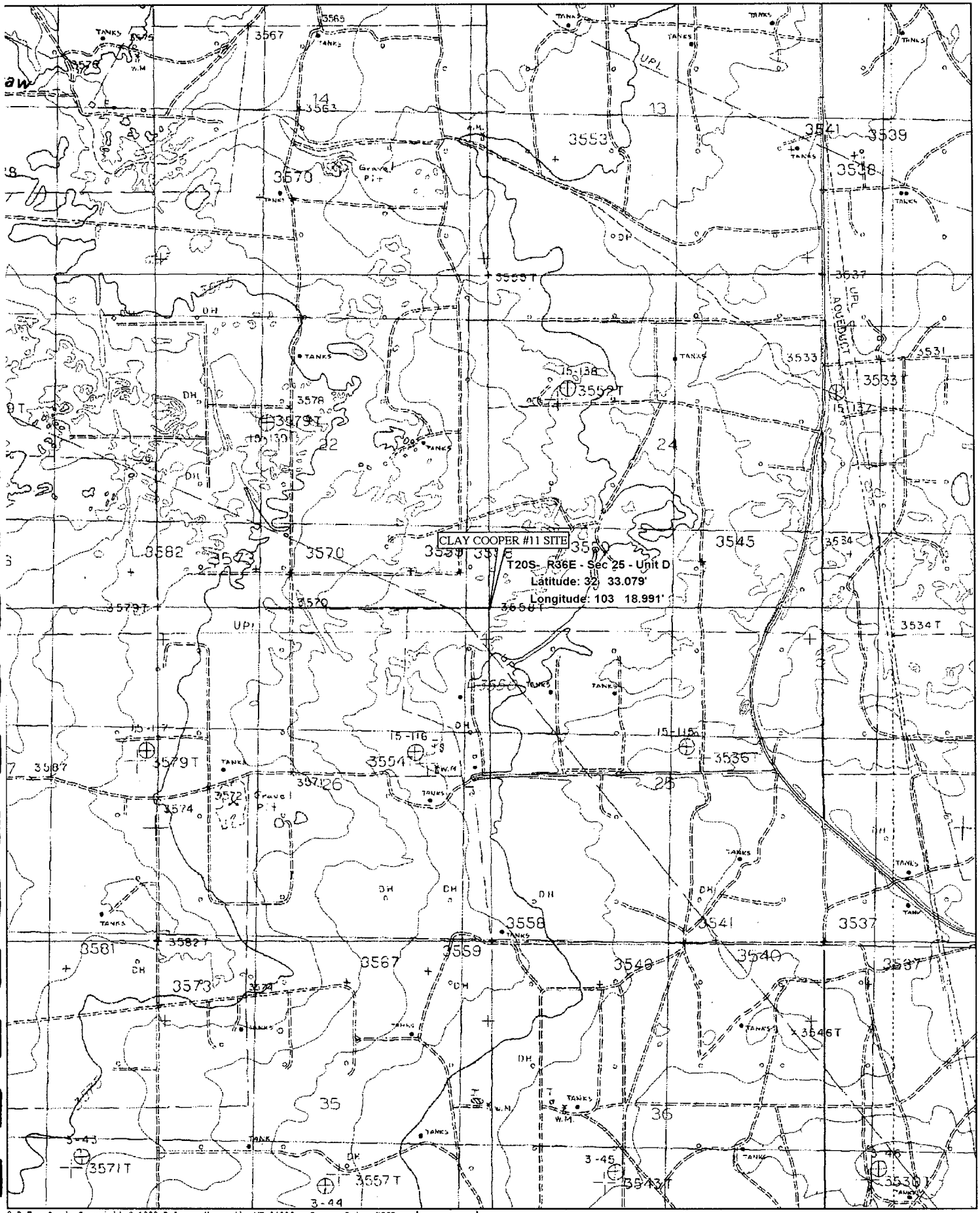
TOPOGRAPHIC MAP

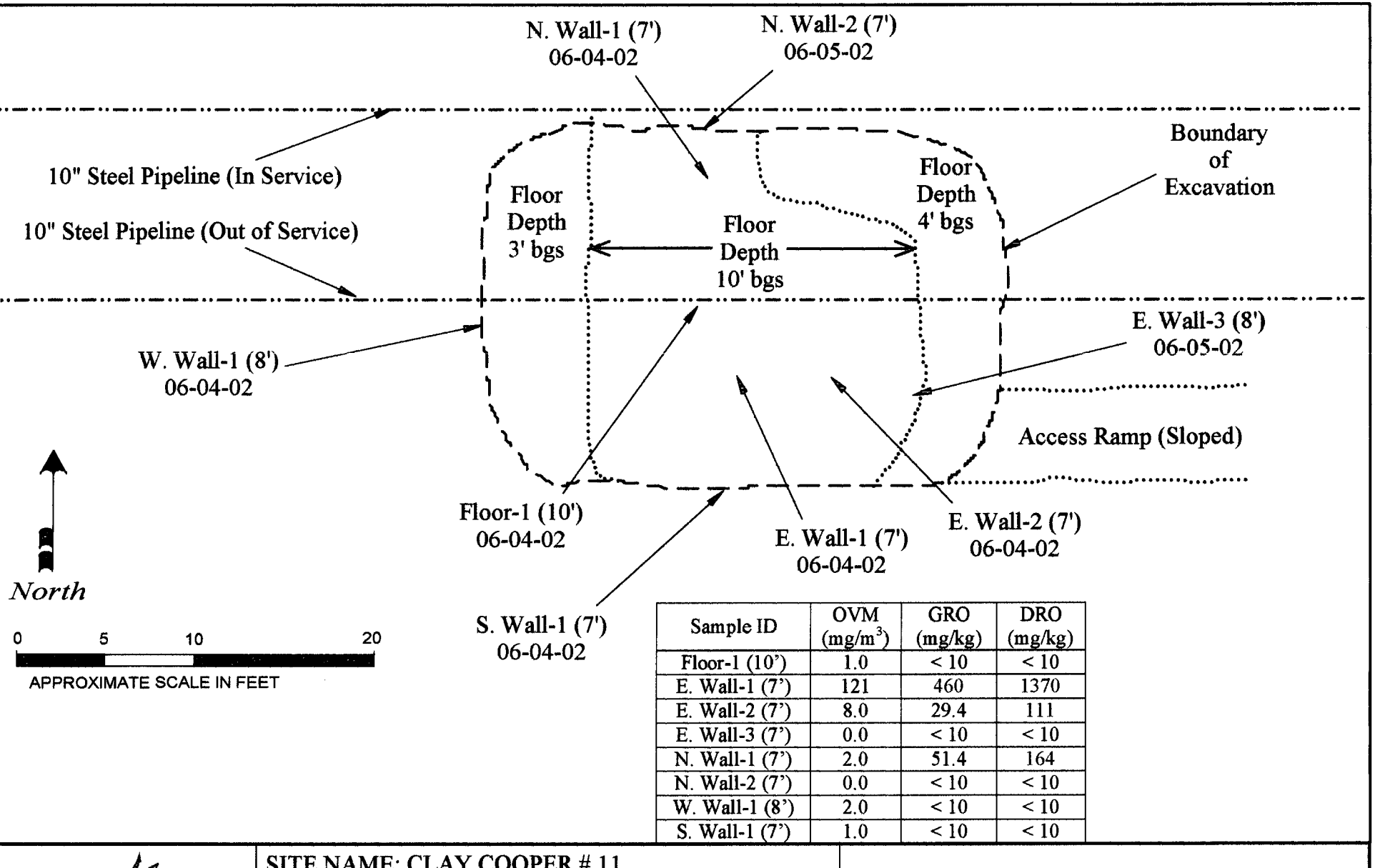
SITE MAP

SITE DATA FORM

C-141 FORM

PHOTODOCUMENTATION


CLAY COOPER #11 SITE
T20S- R36E - Sec 25 - Unit D
Latitude: 32 33.079'
Longitude: 103 18.991'
3-D TopoQuads Copyright © 1999 DeLorme Yarmouth, ME 04096 Source Data: USGS
950 ft Scale: 1 : 24,000 Detail: 13-0 Datum: WGS84



Sample ID	OVM (mg/m^3)	GRO (mg/kg)	DRO (mg/kg)
Floor-1 (10')	1.0	< 10	< 10
E. Wall-1 (7')	121	460	1370
E. Wall-2 (7')	8.0	29.4	111
E. Wall-3 (7')	0.0	< 10	< 10
N. Wall-1 (7')	2.0	51.4	164
N. Wall-2 (7')	0.0	< 10	< 10
W. Wall-1 (8')	2.0	< 10	< 10
S. Wall-1 (7')	1.0	< 10	< 10

TRIDENT ENVIRONMENTAL

SITE NAME: CLAY COOPER # 11	
DATE: 06/05/02	REVISION NO.: 1
DRAWN BY: GJV	FILENAME: CC11.TCW
CHECKED BY: DTL	SCALE: 1 INCH = 20 FT

SITE MAP

Site Data Form

TRW Technician: DTL Excavation Crew Names: Walton Construction Site ID: Clay Cooper # 11

Site Location: Latitude 32° 33.079' N Longitude 103° 18.991' W County: Lea State: New Mexico

Township 20 South Range 36 East Section 25 Unit D

Begin Excavation (Date/Time) 06/04/02 Complete Excavation (Date/Time) 06/05/02

LAND USE: (Check all that apply)
☐ Residential ☐ Recreational ☐ Farm land
☐ Industrial ☐ School/Daycare ■ Range land
■ Oil & Gas ☐ Rural ☐ Other: _____

Depth to Groundwater: ☐ > 100 feet ☐ 50 - 99 ■ < 50 feet
Wellhead Protection Area: ■ > 1,000 feet from a water source ☐ < 200 feet from private domestic water source
Distance to Nearest Surface Water Body: ■ > 1,000 feet ☐ 200 – 1,000 feet ☐ < 200 feet

SURFACE SOILS: ■ Sand ☐ Gravel ☐ Silt
☐ Caliche ☐ Clay ■ Other Sandy silty clay at depth

EXCAVATION DIMENSIONS	Length	Width	Average Depth	Maximum Depth
	18 feet	24 feet	3-10 feet	10 feet

VOLUME EXCAVATED: ~800 yd³ (2400) **VOLUME HAULED TO LANDFARM:** 252 yd³

SUMMARY OF ANALYTICAL RESULTS

Sample ID	Sample Type	Date	OVM (mg/m³)	GRO (mg/kg)	DRO (mg/kg)	Benzene (mg/m³)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)
Floor-1 (10')	Grab	06-04-02	1.0	< 10	< 10	---	---	---	---
E. Wall-1 (7')	Grab	06-04-02	121	460	1370	< 0.025	< 0.025	< 0.025	0.071
E. Wall-2 (7')	Grab	06-04-02	8.0	29.4	111	---	---	---	---
E. Wall-3 (7')	Grab	06-05-02	0.0	< 10	< 10	---	---	---	---
N. Wall-1 (7')	Grab	06-04-02	2.0	51.4	164	---	---	---	---
N. Wall-2 (7')	Grab	06-05-02	0.0	< 10	< 10	---	---	---	---
W. Wall-1 (8')	Grab	06-04-02	2.0	< 10	< 10	---	---	---	---
S. Wall-1 (7')	Grab	06-04-02	1.0	< 10	< 10	---	---	---	---
W. Stockpile-1 (land farm)	Comp	06-04-02	153	689	1540	0.046	0.045	< 0.025	0.147
E. Stockpile-1 (backfill)	Comp	06-04-02	0.7	< 10	< 10	---	---	---	---

Samples analyzed by Environmental Lab of Texas (Odessa, Texas) using EPA Method 8015M for Gas Range Organics (GRO) and Diesel Range Organics (DRO) and EPA Method 8021B for benzene, toluene, ethylbenzene, and xylenes (BTEX).
Headspace readings taken with a Environmental Instrument Model 580B Organic Vapor Meter (OVM).
* Values in red indicate concentrations exceed Oil Conservation Division cleanup guidelines.

* Note: East and north walls were excavated further until concentrations were below OCD guidelines.

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

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Form C-141
Revised March 17, 1999

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

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ■ Final Report

Name of Company: Duke Energy Field Services Inc.	Contact: Mr. Steve Weathers
Address: P. O. Box 5493, Denver, Colorado 80217	Telephone No.: (303) 605-1718
Facility Name: Site Name: CC #11	Facility Type: Natural Gas Pipeline

Surface Owner: Dale Cooper	Mineral Owner: Unknown	Lease No.:

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
D	25	20S	36E		32° 33.079' N		103° 18.991' W	Lea

NATURE OF RELEASE

Type of Release: Condensate	Volume of Release: Unknown	Volume Recovered: ~252 yd³ soil removed
Source of Release: Pipeline	Date and Hour of Occurrence: Unknown	Date and Hour of Discovery: Unknown
Was Immediate Notice Given? ☐ Yes ☐ No ■ Not Required	If YES, To Whom? Paul Sheeley, NMOCD District 1	
By Whom? Steve Weathers	Date and Hour	
Was a Watercourse Reached? ☐ Yes ■ No	If YES, Volume Impacting the Watercourse. N/A	

If a Watercourse was Impacted, Describe Fully.*

N/A

Describe Cause of Problem and Remedial Action Taken.*

Historical condensate release caused by subsurface external corrosion. Removal of impacted soil requested by landowner (Clay Cooper).

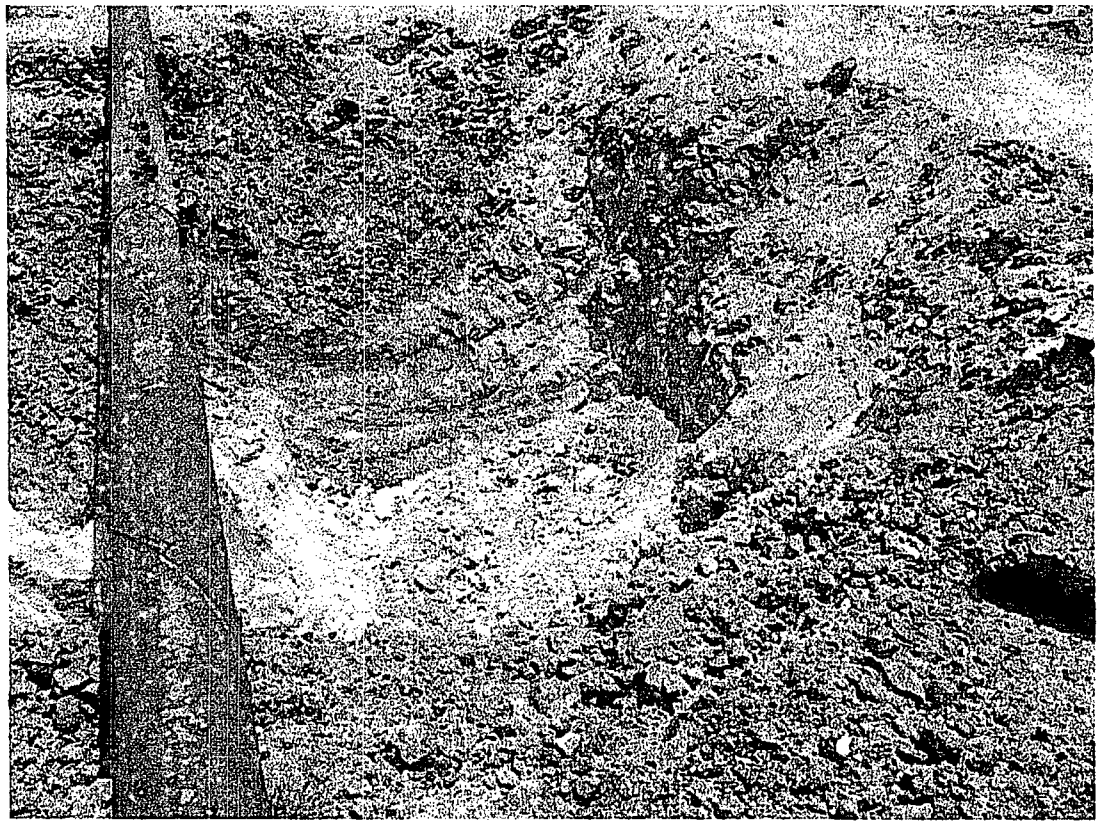
Describe Area Affected and Cleanup Action Taken.*

On 06/04/02 over-excavation was initiated. Excavation continued until 06/05/02. The excavation was relatively shallow (3 ft to 10 ft) and measured approx. 18 ft wide by 24 ft long. Approximately 252 cu yds of soil was transported to cell C-5 at the South Monument Land Farm. Backfilling of excavation was completed on 06/13/02. Closure report, analytical results, photographs, and site map are attached. (2400' excavated)

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

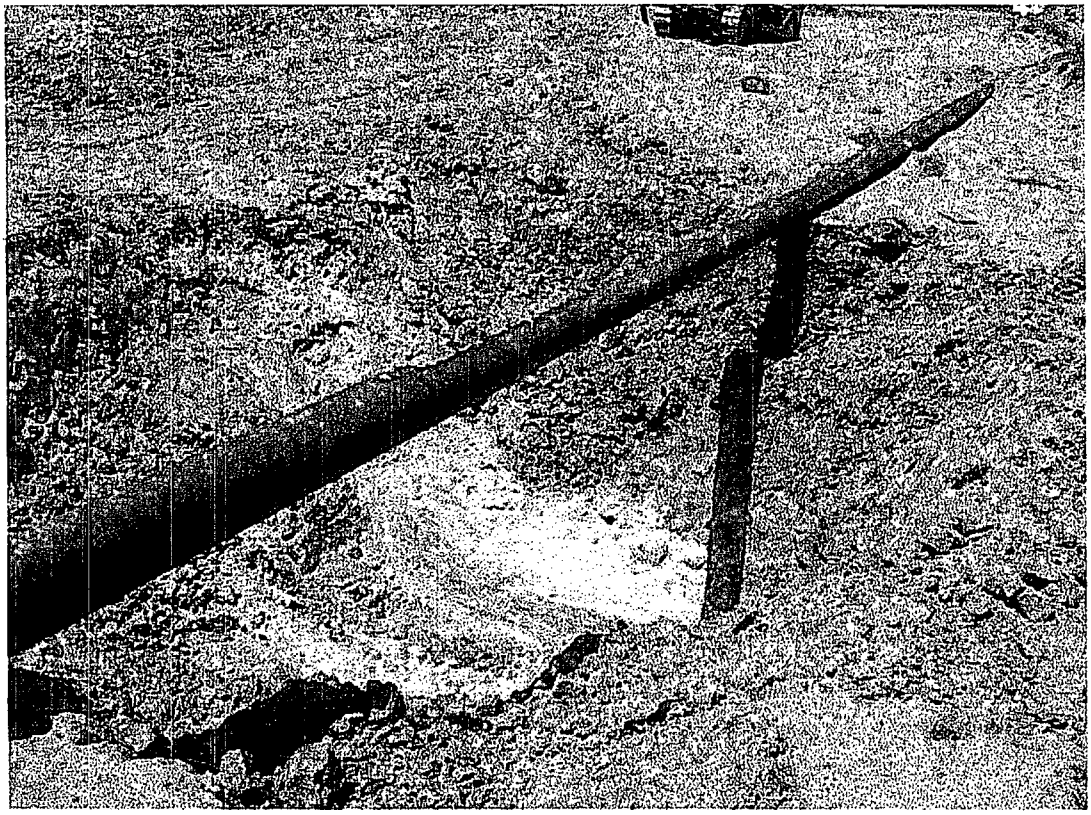
Signature:	OIL CONSERVATION DIVISION
Printed Name: Stephen Weathers	Approved by District Supervisor:
Title: Environmental Specialist	Approval Date: / Expiration Date:
Date: Phone: (303) 605-1718	Conditions of Approval: / Attached ☐

* Attach Additional Sheets If Necessary

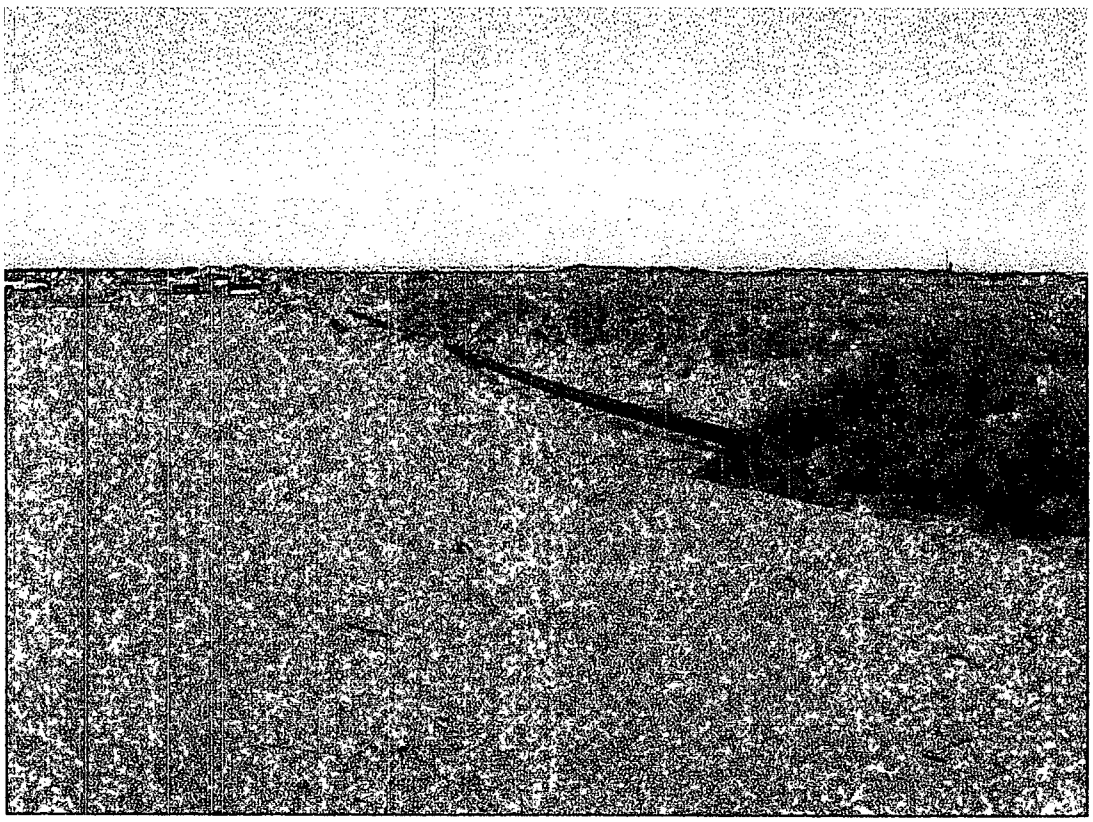


1 View facing east showing area beneath the 12-inch out of service pipeline at completion of excavation activities (06-05-02).

2 View facing north showing area beneath the 12-inch out of service pipeline at completion of excavation activities (06-05-02).



3 View facing southwest showing area beneath the out of service pipeline at completion of excavation activities (06-05-02).



4 View facing west showing CC # 11 site after backfilling (06-13-02)

ATTACHMENT B

LABORATORY ANALYTICAL REPORTS

AND

CHAIN-OF-CUSTODY DOCUMENTATION

CC #11

ANALYTICAL REPORT

Prepared for:

GILBERT VAN DEVENTER
TRIDENT ENVIRONMENTAL
P.O. BOX 7624
MIDLAND, TX 79708

Project:	Duke Energy Field Services
Order#:	G0203508
Report Date:	06/06/2002

Certificates
US EPA Laboratory Code TX00158

ENVIRONMENTAL LAB OF TEXAS

SAMPLE WORK LIST

TRIDENT ENVIRONMENTAL
P.O. BOX 7624
MIDLAND, TX 79708
689-4578

Order#: G0203508
Project: V-106
Project Name: Duke Energy Field Services
Location: CC #11

The samples listed below were submitted to Environmental Lab of Texas and were received under chain of custody. Environmental Lab of Texas makes no representation or certification as to the method of sample collection, sample identification, or transportation/handling procedures used prior to the receipt of samples by Environmental Lab of Texas.

Lab ID:	Sample :	Matrix:	Date / Time Collected	Date / Time Received	Container	Preservative
0203508-01	Floor-1 (10ft.)	SOIL	6/4/02 12:30	6/4/02 16:13	4 oz glass	Ice
	Lab Testing: 8015M	**Rejected:** No		**Temp:** 2.5 C		
0203508-02	E. Wall-1 (7 ft.)	SOIL	6/4/02 12:35	6/4/02 16:13	4 oz glass	Ice
	Lab Testing: 8015M, 8021B/5030 BTEX	**Rejected:** No		**Temp:** 2.5 C		
0203508-03	S. Wall-1 (7 ft.)	SOIL	6/4/02 12:40	6/4/02 16:13	4 oz glass	Ice
	Lab Testing: 8015M	**Rejected:** No		**Temp:** 2.5 C		
0203508-04	W. Wall-1 (8 ft.)	SOIL	6/4/02 12:45	6/4/02 16:13	4 oz glass	Ice
	Lab Testing: 8015M	**Rejected:** No		**Temp:** 2.5 C		
0203508-05	N. Wall-1 (7 ft.)	SOIL	6/4/02 12:50	6/4/02 16:13	4 oz glass	Ice
	Lab Testing: 8015M	**Rejected:** No		**Temp:** 2.5 C		
0203508-06	E. Stockpile-1	SOIL	6/4/02 12:55	6/4/02 16:13	4 oz glass	Ice
	Lab Testing: 8015M	**Rejected:** No		**Temp:** 2.5 C		
0203508-07	W. Stockpile-1	SOIL	6/4/02 13:00	6/4/02 16:13	4 oz glass	Ice
	Lab Testing: 8015M, 8021B/5030 BTEX	**Rejected:** No		**Temp:** 2.5 C		
0203508-08	E. Wall-2 (7 ft.)	SOIL	6/4/02 14:05	6/4/02 16:13	4 oz glass	Ice
	Lab Testing: 8015M	**Rejected:** No		**Temp:** 2.5 C		

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

GILBERT VAN DEVENTER
TRIDENT ENVIRONMENTAL
P.O. BOX 7624
MIDLAND, TX 79708

Order#: G0203508
Project: V-106
Project Name: Duke Energy Field Services
Location: CC #11

Lab ID: 0203508-01
Sample ID: Floor-1 (10ft.)

8015M

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
		6/4/02	1	1	CK	8015M

Parameter	Result mg/kg	RL
GRO, C6-C12	<10.0	10.0
DRO, >C12-C35	<10.0	10.0
TOTAL, C6-C35	<10.0	10.0

Lab ID: 0203508-02
Sample ID: E. Wall-1 (7 ft.)

8015M

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
		6/4/02	1	5	CK	8015M

Parameter	Result mg/kg	RL
GRO, C6-C12	460	50.0
DRO, >C12-C35	1370	50.0
TOTAL, C6-C35	1830	50.0

8021B/5030 BTEX

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
0001892-02		6/5/02	1	25	CK	8021B

Parameter	Result mg/kg	RL
Benzene	<0.025	0.025
Ethylbenzene	<0.025	0.025
Toluene	<0.025	0.025
p/m-Xylene	0.071	0.025
o-Xylene	<0.025	0.025

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

GILBERT VAN DEVENTER
TRIDENT ENVIRONMENTAL
P.O. BOX 7624
MIDLAND, TX 79708

Order#: G0203508
Project: V-106
Project Name: Duke Energy Field Services
Location: CC #11

Lab ID: 0203508-03
Sample ID: S. Wall-1 (7 ft.)

8015M

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
		6/4/02	1	1	CK	8015M

Parameter	Result mg/kg	RL
GRO, C6-C12	<10.0	10.0
DRO, >C12-C35	<10.0	10.0
TOTAL, C6-C35	<10.0	10.0

Lab ID: 0203508-04
Sample ID: W. Wall-1 (8 ft.)

8015M

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
		6/4/02	1	1	CK	8015M

Parameter	Result mg/kg	RL
GRO, C6-C12	<10.0	10.0
DRO, >C12-C35	<10.0	10.0
TOTAL, C6-C35	<10.0	10.0

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

GILBERT VAN DEVENTER
TRIDENT ENVIRONMENTAL
P.O. BOX 7624
MIDLAND, TX 79708

Order#: G0203508
Project: V-106
Project Name: Duke Energy Field Services
Location: CC #11

Lab ID: 0203508-05
Sample ID: N. Wall-1 (7 ft.)

8015M

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
		6/4/02	1	1	CK	8015M

Parameter	Result mg/kg	RL
GRO, C6-C12	**51.4**	10.0
DRO, >C12-C35	**164**	10.0
TOTAL, C6-C35	**215**	10.0

Lab ID: 0203508-06
Sample ID: E. Stockpile-1

8015M

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
		6/4/02	1	1	CK	8015M

Parameter	Result mg/kg	RL
GRO, C6-C12	**<10.0**	10.0
DRO, >C12-C35	**<10.0**	10.0
TOTAL, C6-C35	**<10.0**	10.0

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

GILBERT VAN DEVENTER
TRIDENT ENVIRONMENTAL
P.O. BOX 7624
MIDLAND, TX 79708

Order#: G0203508
Project: V-106
Project Name: Duke Energy Field Services
Location: CC #11

Lab ID: 0203508-07
Sample ID: W. Stockpile-1

8015M

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
		6/4/02	1	5	CK	8015M

Parameter	Result mg/kg	RL
GRO, C6-C12	689	50.0
DRO, >C12-C35	1540	50.0
TOTAL, C6-C35	2229	50.0

8021B/5030 BTEX

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
0001892-02		6/5/02	1	25	CK	8021B

Parameter	Result mg/kg	RL
Benzene	0.046	0.025
Ethylbenzene	0.045	0.025
Toluene	<0.025	0.025
p/m-Xylene	0.147	0.025
o-Xylene	<0.025	0.025

Lab ID: 0203508-08
Sample ID: E. Wall-2 (7 ft.)

8015M

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
		6/4/02	1	1	CK	8015M

Parameter	Result mg/kg	RL
GRO, C6-C12	29.4	10.0
DRO, >C12-C35	111	10.0
TOTAL, C6-C35	140	10.0

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

GILBERT VAN DEVENTER	**Order#:**	**G0203508**
TRIDENT ENVIRONMENTAL	**Project:**	**V-106**
P.O. BOX 7624	**Project Name:**	**Duke Energy Field Services**
MIDLAND, TX 79708	**Location:**	**CC #11**

Approval: Raland K Tuttle 6-06-02

Raland K. Tuttle, Lab Director, QA Officer — Date
Celey D. Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Sandra Biezugbe, Lab Tech.
Sara Molina, Lab Tech.

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

8015M

Order#: G0203508

BLANK SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg	0001882-02			<10.0		
CONTROL SOIL	**LAB-ID #**	**Sample Concentr.**	**Spike Concentr.**	**QC Test Result**	**Pct (%) Recovery**	**RPD**
TOTAL, C6-C35-mg/kg	0001882-03		1000	1000	100.%	
CONTROL DUP SOIL	**LAB-ID #**	**Sample Concentr.**	**Spike Concentr.**	**QC Test Result**	**Pct (%) Recovery**	**RPD**
TOTAL, C6-C35-mg/kg	0001882-04		1000	1010	101.%	1.%
SRM SOIL	**LAB-ID #**	**Sample Concentr.**	**Spike Concentr.**	**QC Test Result**	**Pct (%) Recovery**	**RPD**
TOTAL, C6-C35-mg/kg	0001882-05		1000	1040	104.%	

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

8021B/5030 BTEX

Order#: G0203508

BLANK SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-mg/kg	0001892-02			<0.025		
Ethylbenzene-mg/kg	0001892-02			<0.025		
Toluene-mg/kg	0001892-02			<0.025		
p/m-Xylene-mg/kg	0001892-02			<0.025		
o-Xylene-mg/kg	0001892-02			<0.025		
MS SOIL	**LAB-ID #**	**Sample Concentr.**	**Spike Concentr.**	**QC Test Result**	**Pct (%) Recovery**	**RPD**
Benzene-mg/kg	0203490-07	0	0.1	0.099	99.%	
Ethylbenzene-mg/kg	0203490-07	0	0.1	0.096	96.%	
Toluene-mg/kg	0203490-07	0	0.1	0.093	93.%	
p/m-Xylene-mg/kg	0203490-07	0	0.2	0.190	95.%	
o-Xylene-mg/kg	0203490-07	0	0.1	0.096	96.%	
MSD SOIL	**LAB-ID #**	**Sample Concentr.**	**Spike Concentr.**	**QC Test Result**	**Pct (%) Recovery**	**RPD**
Benzene-mg/kg	0203490-07	0	0.1	0.105	105.%	5.9%
Ethylbenzene-mg/kg	0203490-07	0	0.1	0.102	102.%	6.1%
Toluene-mg/kg	0203490-07	0	0.1	0.099	99.%	6.3%
p/m-Xylene-mg/kg	0203490-07	0	0.2	0.202	101.%	6.1%
o-Xylene-mg/kg	0203490-07	0	0.1	0.102	102.%	6.1%
SRM SOIL	**LAB-ID #**	**Sample Concentr.**	**Spike Concentr.**	**QC Test Result**	**Pct (%) Recovery**	**RPD**
Benzene-mg/kg	0001892-05		0.1	0.100	100.%	
Ethylbenzene-mg/kg	0001892-05		0.1	0.095	95.%	
Toluene-mg/kg	0001892-05		0.1	0.093	93.%	
p/m-Xylene-mg/kg	0001892-05		0.2	0.188	94.%	
o-Xylene-mg/kg	0001892-05		0.1	0.096	96.%	

TRIDENT ENVIRONMENTAL

Trident Environmental
P.O. Box 7624
Midland, Texas 79708 (915) 528-3878
~~(915) 682-0808~~
~~(915) 682-0727 (Fax)~~ (915) 689-4578

V-106-CC11-01

Chain of Custody

Date 6-4-02 Page 1 of 1

Lab Name: Environmental Lab of Texas, Inc.
Address: 12600 West I-20 East
Odessa, TX 79763
Telephone: (915) 563-1800 Fax: (915) 563-1713

Samplers (SIGNATURES) Dale Littlejohn

Sample Identification	Matrix	Date	Time	Sample Type: G - Grab, C - Composite	BTEX (EPA 8021B)	MTBE (EPA 8021B)	SVOC (EPA 8270)	PAH (EPA 8270)	VOC (EPA 8260)	TPH (EPA 418.1)	TPH (TX-1005)	TPH (TX-1006)	GRO (EPA 8015G) (Extended)	DRO (EPA 8015D)	TDS (EPA 160.1)	Anions/Cations	Total Metals	TCLP Metals	Number of Containers	
Floor-1 (10ft)	Soil	6/4/02	1230	G									✓	✓					1	01
E. Wall-1 (7ft)	"	"	1235	G	✓								✓	✓					1	02
S. Wall-1 (7ft)	"	"	1240	G									✓	✓					1	03
W. Wall-1 (8ft)	"	"	1245	G									✓	✓					1	04
N. Wall-1 (7ft)	"	"	1250	G									✓	✓					1	05
E. Stockpile-1	"	"	1255	C									✓	✓					1	06
W. Stockpile-1	"	"	1300	C	✓								✓	✓					1	07
E. Wall-2 (7ft)	"	"	1405	G									✓	✓					1	08

0203508

Project Information

Project Name:	Duke Energy Field Services
Project Location:	CC#11
Project Manager:	Gil Van Deventer
Cost Center No.:	V-106
Shipping ID No.:	
Bill to (see below):	Duke Energy Field Services
Special Instructions:	Attn: Steve Weathers POBox 5493 Denver, CO 80217

Sample Receipt

Total Containers:	8
COC Seals:	
Rec'd Good Cond/Cold:	2.5°
Conforms to Records:	
Lab No.:	

Relinquished By: (1) (Company) Trident Environmental
(Printed Name) ~~Gil Van Deventer~~ Dale Littlejohn
(Signature) Dale Littlejohn
(Date) 6/4/02 (Time) 16:13

Received By: (1) (Company) ELOT
(Printed Name) Jeanne McMurrey
(Signature) Jeanne McMurrey
(Date) 06-04-02 (Time) 1613

Relinquished By: (2) (Company)
(Printed Name)
(Signature)
(Date) (Time)

Received By: (2) (Company)
(Printed Name)
(Signature)
(Date) (Time)

Relinquished By: (3) (Company)
(Printed Name)
(Signature)
(Date) (Time)

Received By: (3) (Company)
(Printed Name)
(Signature)
(Date) (Time)

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Need first thing AM 6/5/2

*Add BTEX to W. Stockpile #1 as per Dale 06-05-02 @ 1000

ANALYTICAL REPORT

Prepared for:

GILBERT VAN DEVENTER
TRIDENT ENVIRONMENTAL
P.O. BOX 7624
MIDLAND, TX 79708

Project:	Duke Energy Field Services
Order#:	G0203522
Report Date:	06/06/2002

Certificates
US EPA Laboratory Code TX00158

ENVIRONMENTAL LAB OF TEXAS

SAMPLE WORK LIST

TRIDENT ENVIRONMENTAL
P.O. BOX 7624
MIDLAND, TX 79708
689-4578

Order#: G0203522
Project:
Project Name: Duke Energy Field Services
Location: CC #11

The samples listed below were submitted to Environmental Lab of Texas and were received under chain of custody. Environmental Lab of Texas makes no representation or certification as to the method of sample collection, sample identification, or transportation/handling procedures used prior to the receipt of samples by Environmental Lab of Texas.

Lab ID:	Sample :	Matrix:	Date / Time Collected	Date / Time Received	Container	Preservative
0203522-01	East Wall-3 (8 ft)	SOIL	6/5/02 13:10	6/5/02 15:20	4 oz glass	Ice
	Lab Testing: 8015M	Rejected: No		Temp: -1.0 C		
0203522-02	North Wall-2 (7 ft)	SOIL	6/5/02 13:15	6/5/02 15:20	4 oz glass	Ice
	Lab Testing: 8015M	Rejected: No		Temp: -1.0 C		

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

GILBERT VAN DEVENTER
TRIDENT ENVIRONMENTAL
P.O. BOX 7624
MIDLAND, TX 79708

Order#: G0203522
Project:
Project Name: Duke Energy Field Services
Location: CC #11

Lab ID: 0203522-01
Sample ID: East Wall-3 (8 ft)

8015M

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
		6/5/02	1	1	CK	8015M

Parameter	Result mg/kg	RL
GRO, C6-C12	<10.0	10.0
DRO, >C12-C35	<10.0	10.0
TOTAL, C6-C35	<10.0	10.0

Lab ID: 0203522-02
Sample ID: North Wall-2 (7 ft)

8015M

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
		6/5/02	1	1	CK	8015M

Parameter	Result mg/kg	RL
GRO, C6-C12	<10.0	10.0
DRO, >C12-C35	<10.0	10.0
TOTAL, C6-C35	<10.0	10.0

Approval: Raland K Tuttle 6-06-02
Raland K. Tuttle, Lab Director, QA Officer — Date
Celey D. Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Sandra Biezugbe, Lab Tech.
Sara Molina, Lab Tech.

N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

8015M

Order#: G0203522

BLANK SOIL	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
TOTAL, C6-C35-mg/kg	0001895-02			<10.0		
CONTROL SOIL	**LAB-ID #**	**Sample Concentr.**	**Spike Concentr.**	**QC Test Result**	**Pct (%) Recovery**	**RPD**
TOTAL, C6-C35-mg/kg	0001895-03		952	853	89.6%	
CONTROL DUP SOIL	**LAB-ID #**	**Sample Concentr.**	**Spike Concentr.**	**QC Test Result**	**Pct (%) Recovery**	**RPD**
TOTAL, C6-C35-mg/kg	0001895-04		952	808	84.9%	5.4%
SRM SOIL	**LAB-ID #**	**Sample Concentr.**	**Spike Concentr.**	**QC Test Result**	**Pct (%) Recovery**	**RPD**
TOTAL, C6-C35-mg/kg	0001895-05		1000	1020	102.%	

TRIDENT ENVIRONMENTAL

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P.O. Box 7624
Midland, Texas 79708
(915) ~~682-0808~~ 528-3878
(915) ~~682-0727~~ (Fax) 689-4578

V-106-CC11-03

Chain of Custody

Date 6/5/02 Page 1 of 1

Lab Name: Environmental Lab of Texas, Inc.
Address: 12600 West I-20 East
Odessa, TX 79763
Telephone: (915) 563-1800 Fax: (915) 563-1713

Samplers (SIGNATURES) Dale T Littlejohn

Sample Identification	Matrix	Date	Time	Sample Type: G - Grab, C - Composite	BTEX (EPA 8021B)	MTBE (EPA 8021B)	SVOC (EPA 8270)	PAH (EPA 8270)	VOC (EPA 8260)	TPH (EPA 418.1)	TPH (TX-1005)	TPH (TX-1006)	GRO (EPA 8015G) (Extended)	DRO (EPA 8015D)	TDS (EPA 160.1)	Anions/Cations	Total Metals	TCLP Metals	Number of Containers
East Wall-3 (8ft)	Soil	6/5/02	1310	G									✓	✓					
North Wall-2 (7ft)	Soil	"	1315	G									✓	✓					

Analysis Request

Project Information		Sample Receipt	
Project Name:	Duke Energy Field Services	Total Containers:	
Project Location:	CC#11	COC Seals:	
Project Manager:	Gil Van Deventer	Rec'd Good Cond/Cold:	
Cost Center No.:	V-106	Conforms to Records:	
Shipping ID No.:		Lab No.:	
Bill to (see below):	Duke Energy Field Services		
Special Instructions:	Attn: Steve Weathers POBox 5493 Denver, CO 80217		

Relinquished By: (1) (Company)	Relinquished By: (2) (Company)	Relinquished By: (3) (Company)
Trident Environmental	(Printed Name)	(Printed Name)
(Printed Name) Dale T. Littlejohn / Gil Van Deventer	(Signature)	(Signature)
(Signature) Dale T Littlejohn	(Date) (Time)	(Date) (Time)
(Date) 6/5/02 (Time) 1520		
Received By: (1) (Company) ELOT	**Received By:** (2) (Company)	**Received By:** (3) (Company)
(Printed Name) Jeanne McMurrey	(Printed Name)	(Printed Name)
(Signature) Jeanne McMurrey	(Signature)	(Signature)
(Date) 6-5-2 (Time) 1520	(Date) (Time)	(Date) (Time)

* Need Results by Thurs. am (6/6)

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-1.0°C

ATTACHMENT C

FIELD BOOK NOTES

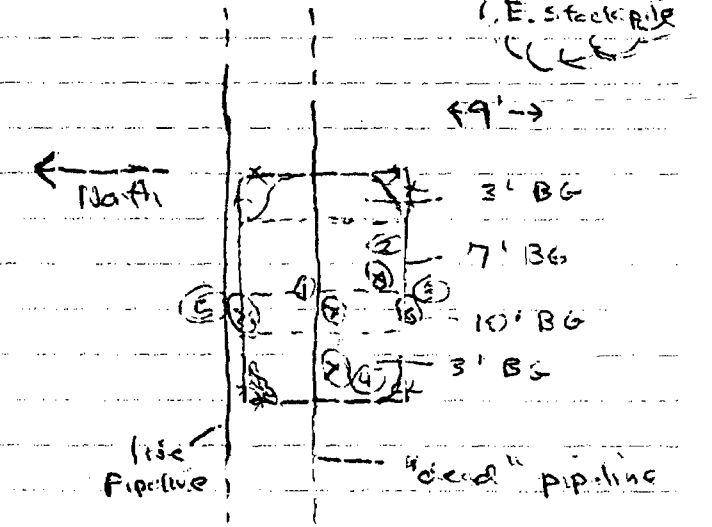
5-13-02 CC#10

DTL 6/4/02 (J)

0900 (CT) Leave Medicine, stop for sunscreen, ice, etc.

1155 arrive at CC# 1 Site. (116 miles) No one present upon arrival.

- GPS - CC# 11, Fence Corner Post
- GPS - CC# 12 (east of CC# 11)



1) - Floor 1 (10')
2) - E wall - 1 (7')
3) - S wall - 1 (7')
4) - W wall - 1 (8')
5) - N. wall - (7')

West stockpile (confirm)

going to cell 5-C

"deep samples for C as follows:

15
11
45

540 yd³

(2) 6/4/02 OTL

1229 (CT) Checked PID (1.1 ppm)

Pit Screening results

max reading in center of of deepest portion (1.0 ppm) and at SE corner of deepest portion (4.0 ppm)

All other readings < 1.0 ppm

1309 PID samples in bag

1)	Floor-1 (10')	1.0 ppm
2)	E.Wall-1 (7')	12.1 ppm
3)	S.Wall-1 (7')	1.0 ppm
4)	W.Wall-1 (8')	2.0 ppm
(5)	N.Wall-1 (7')	2.0 ppm
(6)	E. Stockpile-1	0.7 ppm
(7)	W. Stockpile	15.3 ppm

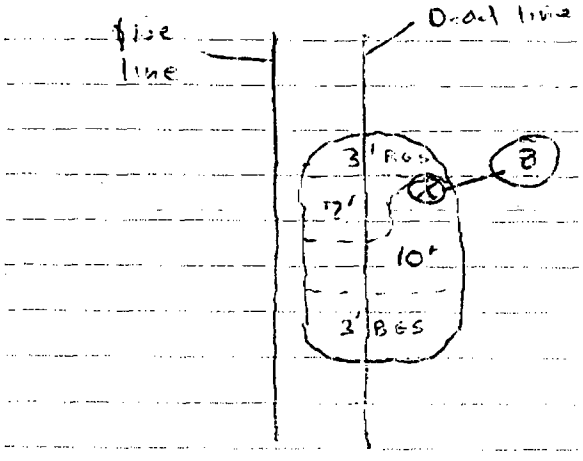
1344 Had Mike excavate the SE Corner a few more feet to remove the soil assoc. with sample # 2 above.

1351 Called Gil told him about excav. said to run BTEX only on P.O's > 100, G-RO's > 100 + dirt, Stockpile.

OTL 6/4/02 (3)

Final Pit Size as of 1400 CT

North



8) E.Wall-2 (7') 8 ppm PID

1407 Check PID calibration 98 ppm PID

1420 Leave CC-11 site for Lab

Duke Energy.
Field Services
A New Kind of Energy™

Duke Energy Field Services
P.O. Box 5493
Denver, Colorado 80217
370 17th Street, Suite 900
Denver, Colorado 80202
303/595-3331

September 20, 2002

Mr. Paul Sheeley
New Mexico Oil Conservation Division
1625 N. French Drive
Hobbs, New Mexico 88240

RE: Spill Site Closure Report
Duke Energy Field Services, LP
Lea County, NM

Mr. Sheeley:

Enclosed please find for your review, one copy of the closure report summarizing remedial activities associated with the Duke Energy Field Services, LP spill site:

- **Clay Cooper #11 – T20S, R36E, Sec 25 Unit D**

Based on the information provided in the above referenced closure report, DEFS would like to request no further action for the spill site.

If you have any questions regarding the information provided in the closure reports, please give me a call at 303-605-1718.

Sincerely

Duke Energy Field Services, LP

Stephen Weathers
Environmental Specialist

cc: Environmental Files

Enclosure

September 24, 2002

Mr. Gilbert J. Van Deventer
Trident Environmental
POB 7624
Midland, TX 79708

Re: Work Plan for Removal of Hydrocarbon-Impacted Soils for Duke Energy Field Services(DEFS) pipeline-right-of-way. (Clay Cooper #11 site).
Site Location: UL-D, Sec 25-T20S-R36E
Dated: August 7, 2002

Dear Mr. Van Deventer,

The work plan referenced above and submitted to the New Mexico Oil Conservation Division (OCD) by Trident Environmental for DEFS is **hereby approved.** Please notify The New Mexico Oil Conservation Division (OCD), at least 24 hours (preferably 48), before final closure sampling event(s).

Please be advised that OCD approval of this plan does not relieve DEFS of liability should their operations fail to adequately investigate and remediate contaminants that threaten ground water, surface water, human health or the environment. In addition, OCD approval does not relieve DEFS of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions or need assistance write or call: (505) 393-6161, ext. 113, or email: psheeeley@state.nm.us

Sincerely,

Paul Sheeley-Environmental Engineer
Cc: Roger Anderson - Environmental Bureau Chief
Chris Williams - District I Supervisor
Bill Olson - Hydrologist
Larry Johnson - Environmental Engr.
Stephen Weathers - DEFS