

**Jimmy Cooper #6 Closure Report  
Duke Energy Field Services  
Lea County, New Mexico**

IRP-218  
10.26.03

NOVEMBER 14, 2001

*Prepared For:*

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

*Site Name:*

**JIMMY COOPER #6 (JC#6)**

*Site Location:*

**T20S, R37 E, SECTION 8, UNIT O**

*Prepared By:*



**PO Box 7624  
Midland, Texas 79708**



November 14, 2001

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

Re: Removal of Hydrocarbon-Impacted Soils from the JC #6 site  
Township 20 South, Range 37 East, Section 8, Unit O

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 near Monument, New Mexico in Lea County. The site (JC #6) is located in Section 8 (Unit O), Township 20 South, Range 37 East on property owned by Jimmy T. Cooper. The location of the JC #6 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

Allstate Services Environmental (Allstate) performed excavation. Allstate used one trackhoe, one dozer, and one loader for earthmoving services. An area was excavated where Mr. Cooper identified indications of hydrocarbon-impacted soils. During excavation operations, subsurface soil samples were collected by Trident with stainless steel trowels. Grab samples were collected from the floor and each wall (north, south, east, and west) of the excavation (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 for soil samples that exceeded OVM readings of 100 ppm or when GRO and/or DRO concentrations were above 100 mg/kg.

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 C & C 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.

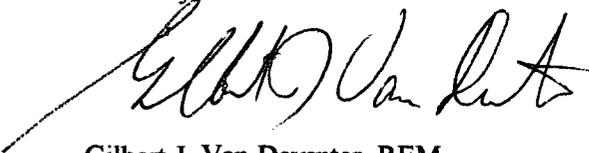
Approximately 504 cubic yards of hydrocarbon-impacted soils were transported by local hauling contractors (Allstate) to the C & C Landfarm, owned and operated by Mr. Jimmy T. Cooper (OCD Rule 711 Permit Approval NM-01-0016). Completed *Generator Certificate of Waste Status (C-143)* and *Release Notification and Corrective Action (C-141)* forms are 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 and site features are depicted on the site map in Attachment A. A Site Data Form that includes 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: Jimmy Cooper, landowner – Monument, NM

**ATTACHMENT A**

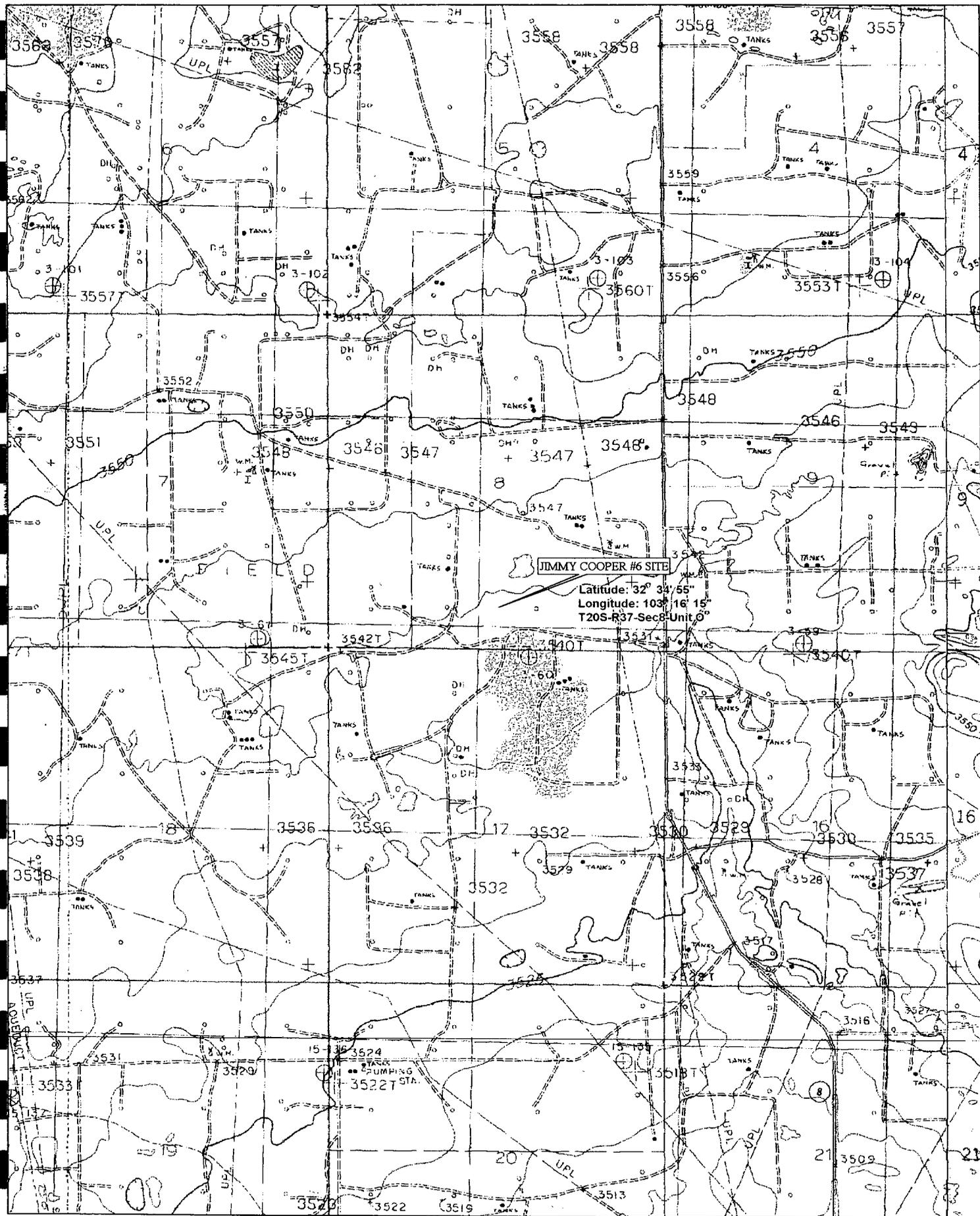
**TOPOGRAPHIC MAP**

**SITE MAP**

**SITE DATA FORM**

**C-141 AND C-143 FORMS**

**PHOTODOCUMENTATION**



1 cm<sup>2</sup>—0.1550 in<sup>2</sup>  
 1 m<sup>2</sup>—6.452 cm<sup>2</sup>  
 1 m<sup>2</sup>—10.764 ft<sup>2</sup>  
 1 ft<sup>2</sup>—929.0 cm<sup>2</sup>

1 acre—43,560 ft<sup>2</sup>  
 —4049 m<sup>2</sup>

1 hectare—10,000 m<sup>2</sup>  
 —2.471 acres

1 m<sup>2</sup>—2.590 km<sup>2</sup>  
 —640 acres

**Volume**

1 m<sup>3</sup>—1000 liters  
 —35.314 ft<sup>3</sup>  
 —264 gal (U.S.)

1 ft<sup>3</sup>—28.320 liters  
 —7.481 gal (U.S.)

1 gal—3.785 liters

1 acre foot—43,560 ft<sup>3</sup>  
 —3.259 × 10<sup>6</sup> gal  
 —1234 m<sup>3</sup>

**Discharge**

ft<sup>3</sup>/min—0.472 liters/sec  
 1 acre foot/day  
 —3.259 × 10<sup>6</sup> gal/day

1 ft<sup>3</sup>/sec—448.8 gal/min  
 —724 acre feet/year

**Density**

Water 1.000 g/cm<sup>3</sup> at 4°C

0.998 g/cm<sup>3</sup> at 20°C

Sea water 1.025 g/cm<sup>3</sup>  
 at 15°C

Mercury 13.55 g/cm<sup>3</sup>  
 at 20°C

Air 1.29 × 10<sup>-3</sup> g/cm<sup>3</sup>  
 at 20°C and  
 atmospheric pressure

**Specific weight  
 water in air**

8.335 lb/gal at 0°C

8.328 lb/gal at 60° F

8.322 lb/gal at 20° C

62.18 lb/ft<sup>3</sup> at 60° F

**Pressure**

1 bar—0.9869 atmosphere

—10<sup>6</sup> dynes/cm<sup>2</sup>

—14.50 lb/in<sup>2</sup>

**pressure developed  
 from static liquid**

1 cm mercury

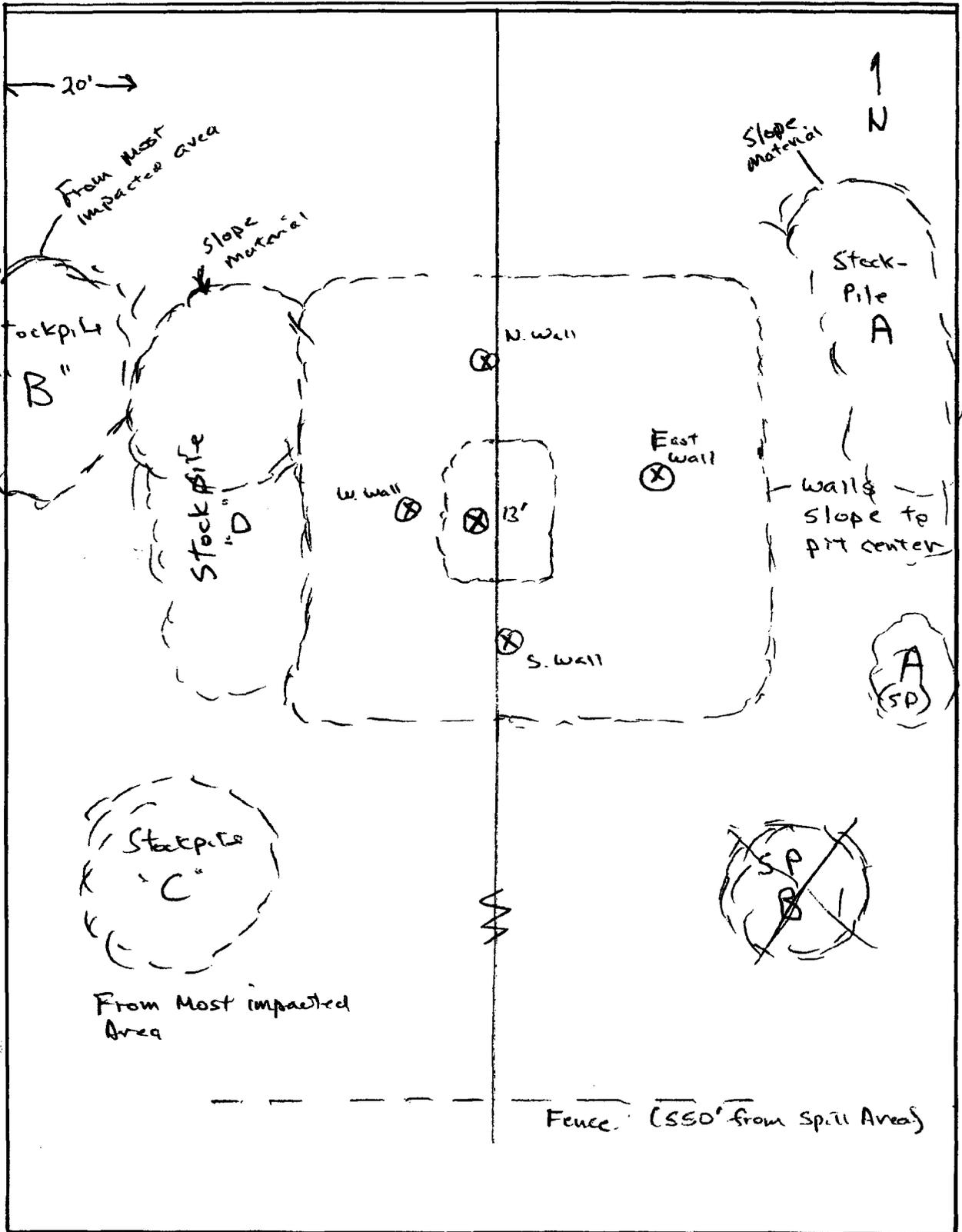
—0.01316 atmosphere

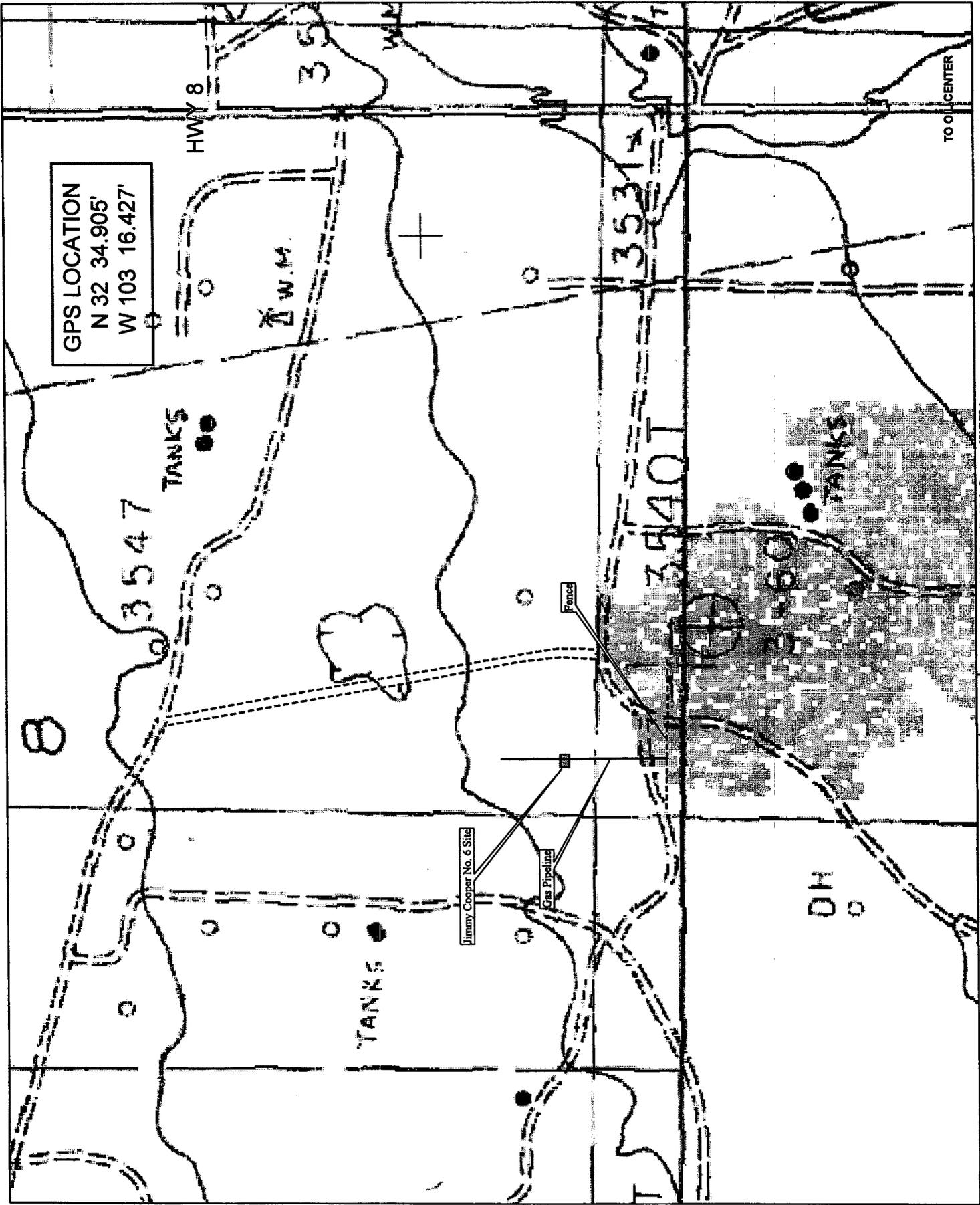
1 ft water

—0.02950 atmosphere

33.90 ft water

—1.00 atmosphere





# Site Data Form

TRW Technician: DTL Excavation Crew Names: Allstate Services Environmental Site ID: Jimmy Cooper #6

Site Location: Latitude 32° 34' 55" Longitude 103° 16' 15" County: Lea State: New Mexico

Section 8 Township 20 South Range 37 East Unit 0

Begin Excavation (Date/Time) 07/03/01 8:00 AM Complete Excavation (Date/Time) 07/03/01 5:00 PM

**LAND USE:** (Check all that apply)

<input type="checkbox"/> Residential	<input type="checkbox"/> Recreational	<input type="checkbox"/> Farm land
<input type="checkbox"/> Industrial	<input type="checkbox"/> School/Daycare	<input checked="" type="checkbox"/> Range land
<input checked="" type="checkbox"/> Oil & Gas	<input type="checkbox"/> Rural	<input type="checkbox"/> 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:**

<input checked="" type="checkbox"/> Sand	<input type="checkbox"/> Gravel	<input type="checkbox"/> Silt
<input checked="" type="checkbox"/> Caliche	<input checked="" type="checkbox"/> Clay	<input type="checkbox"/> Other: _____

**EXCAVATION DIMENSIONS**

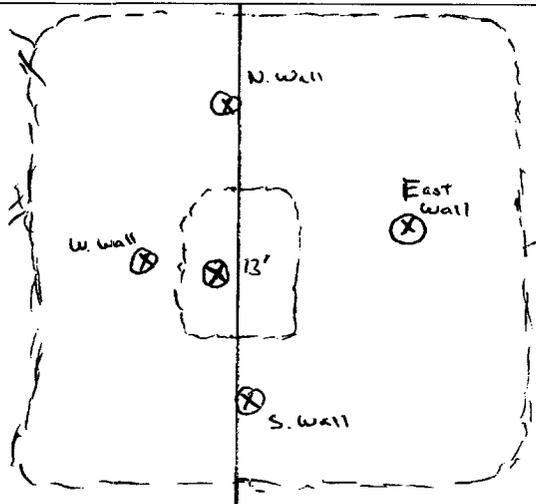
Length	Width	Average Depth	Maximum Depth
<u>70</u> feet	<u>65 (sloped)</u> feet	<u>8</u> feet	<u>13</u> feet

**VOLUME EXCAVATED:** 350 ~~1,000~~ yd<sup>3</sup>      **VOLUME HAULED TO LANDFARM:** 504 yd<sup>3</sup>

### SUMMARY OF OVM, GRO, AND DRO CONCENTRATIONS WITH SAMPLE LOCATION MAP

Sample Location (Depth)	Sample Type	OVM (ppm)	GRO (mg/kg)	DRO (mg/kg)	Benzene (mg/kg)	BTEX (mg/kg)
Pipeline Source Area (surface)	Grab	118	105	133	<0.025	0.054
Floor (10 ft)	Grab	67	< 10	< 10	<0.025	<0.025
Floor (13 ft)	Grab	<1	< 10	< 10	< 10	< 10
West Wall (11 ft)	Grab	<1	< 10	< 10	< 10	< 10
East Wall (8 ft)	Grab	<1	< 10	< 10	< 10	< 10
South Wall (8 ft)	Grab	5	< 10	< 10	< 10	< 10
North Wall (8 ft)	Grab	1	< 10	< 10	< 10	< 10
NMOCD Guidelines		100	100	100	10	50

Samples in red type indicate concentrations above NMOCD 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: JC #6	Facility Type Natural Gas Pipeline

Surface Owner Jimmy Cooper	Mineral Owner Unknown	Lease No.
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**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the North/South Line	Latitude	Feet from the East/West Line	Longitude	County
O	8	20S	37E		32° 34' 55" N		103° 16' 15" W	Lea

**NATURE OF RELEASE**

Type of Release Condensate	Volume of Release Unknown	Volume Recovered None (no release documented)
Source of Release Pipeline	Date and Hour of Occurrence Unknown	Date and Hour of Discovery Unknown
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom? Paul Sheeley, NMOCD District 1	
By Whom? Steve Weathers	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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 external corrosion of steel pipeline in subsurface. Steel pipeline had 5 clamps to repair historical leaks. Removal of impacted soil requested by landowner (Jimmy Cooper).

Describe Area Affected and Cleanup Action Taken.\*

On 7/3/01 over-excavation was initiated and completed. At the completion of excavation activities all areas had GRO and DRO concentrations on floors and walls below 10 mg/kg. Final excavation dimensions were approx. 65 ft wide (sloped) by 70 long by 8-13 ft deep. Backfilling of excavation was completed on 7/6/01. Approx. 504 cu yds of soil was transported to the C&C Landfarm. Closure report, analytical results, photographs, and site map are attached. 1512' 3000' 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:	<b>OIL CONSERVATION DIVISION</b>		
Printed Name: Stephen Weathers	Approved by District Supervisor:		
Title: Environmental Specialist	Approval Date:	Expiration Date:	
Date: 11/15/01 Phone: (303) 605-1718	Conditions of Approval:	Attached <input type="checkbox"/>	

\* Attach Additional Sheets If Necessary

(505) 393-6161  
French Dr  
NM 88240  
District II - (505) 748-1283  
1 S. First  
Mesita, NM 88210  
District III - (505) 334-6178  
100 Rio Brazos Road  
Aztec, NM 87410  
District IV - (505) 827-7131  
2040 S. Pacheco  
Santa Fe, NM 87505

New Mexico  
Energy Minerals and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

Form C-143  
3/15/00

Submit to OCD  
Permitted Surface  
Waste Management  
Facility

**GENERATOR CERTIFICATE OF WASTE STATUS**

1. Waste Generator Name and Address:

2. Permit Number (if waste generated at an OCD permitted facility)

Duke Energy Field Services Inc.  
O. Box 5493  
Denver, Colorado 80217

3. Description of Waste and Generating Process:

4. Location of Waste (Street address &/or ULSTR):

Hydrocarbon-impacted soil  
from historic pipeline leak

Site Name: JC#6  
Sec. 8, Unit O, T20S, R36E

5. Destination (Surface Waste Management Facility):

6. Transporter:

C & C Landfarm, Inc. (NM-01-0012)  
Sec 3, T20S, R37E  
Box 55, Monument, NM 88265  
(505) 397-2045

Allstate Services (subcontract haulers from  
Hobbs, NM)

7. Estimated Volume 1,000 cy/bbls

For NON-EXEMPT waste only, the following documentation is attached (check appropriate items):

MSDS Information

RCRA Hazardous Waste Analysis (With Chain of Custody).

Other (Description)

Generator certifies that, according to the Resource Conservation and Recovery Act (RCRA) and the Environmental Protection Agency's July 1988 regulatory determination, the above described waste is: (check appropriate classification)

EXEMPT oilfield waste.

NON-EXEMPT oilfield waste that is non-hazardous pursuant to 40 CFR Part 261. (Attach appropriate documentation)

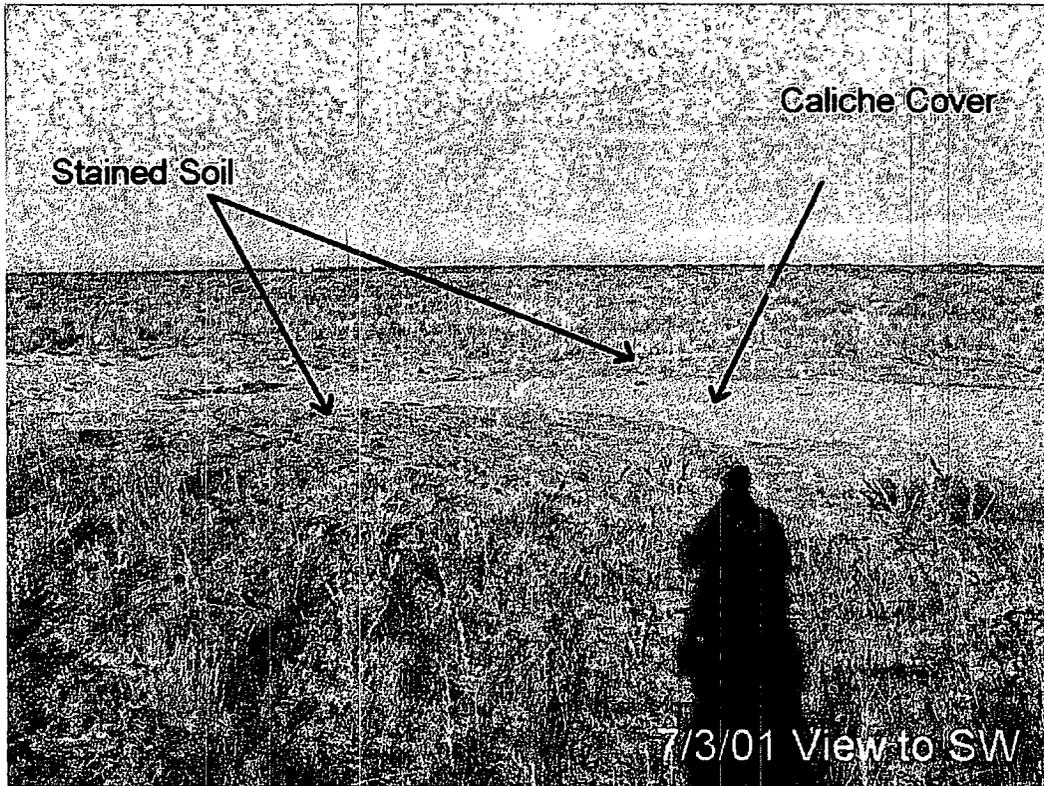
In addition, Generator certifies that nothing has been added to this exempt or non-exempt non-hazardous waste and that this waste does not contain Naturally Occurring Radioactive Material (NORM) regulated pursuant to 20 NMAC 3.1 part 1403.

Generator Signature: [Signature]

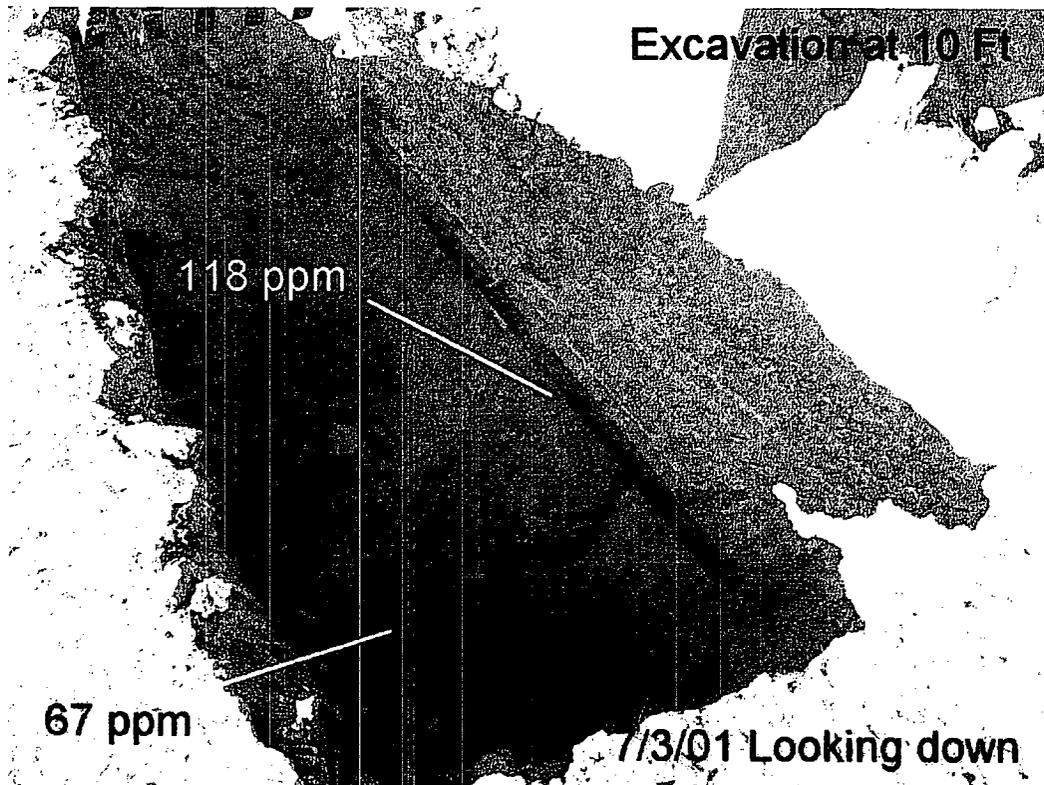
Date: 7/2/01

Name: Stephen W. Weathers

Title: Environmental Specialist



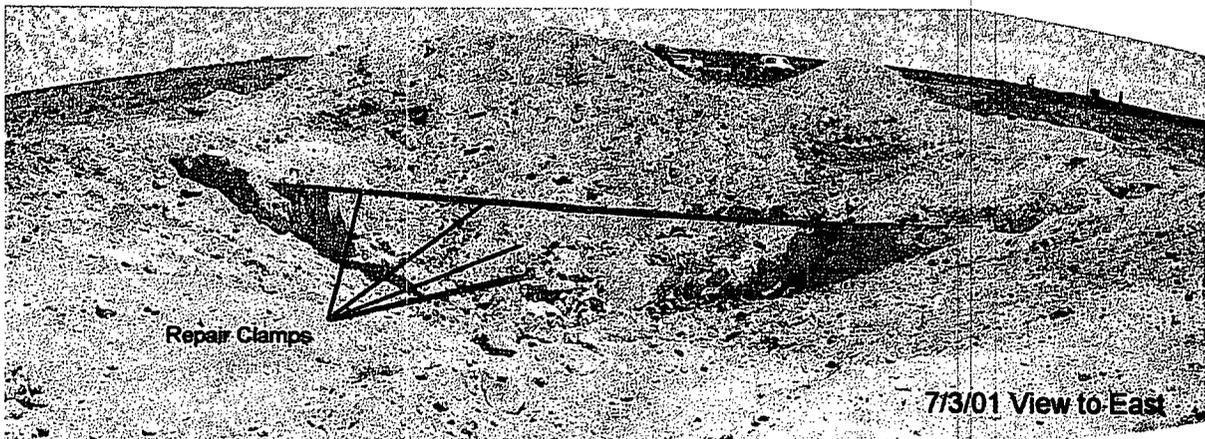
JC6-1 View of site just prior to excavation.



JC6-2 View showing floor and wall of excavation at depth of 10 feet with organic vapor monitor readings indicated.



JC6-3 View facing north showing completed excavation.



JC6-4 View facing east showing location of pipe clamps and completed excavation.

**ATTACHMENT B**

**LABORATORY ANALYTICAL REPORTS  
AND  
CHAIN-OF-CUSTODY DOCUMENTATION**

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TRIDENT ENVIRONMENTAL  
ATTN: MR. GILBERT VAN DEVENTER  
P.O. BOX 7624  
MIDLAND, TEXAS 79708  
FAX: 689-4578

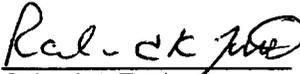
Sample Type: Soil  
Sample Condition: Intact/ Iced/ 1.0 deg C  
Project #: V-105  
Project Name: Duke Energy Field Services  
Project Location: JC #6

Sampling Date: 07/03/01  
Receiving Date: 07/03/01  
Analysis Date: 07/03/01

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg
41628	Pipeline Source Area	105	133
41629	Floor (10 ft)	<10	<10
41630	Stockpile A (East)	<10	<10
41631	Stockpile (B) (Far West)	<10	<10
41632	Stockpile C (SW)	<10	<10
41633	Stockpile D (Near West)	<10	<10

QUALITY CONTROL	437	462
TRUE VALUE	500	500
% INSTRUMENT ACCURACY	87	92
SPIKED AMOUNT	476	476
ORIGINAL SAMPLE	<10	<10
SPIKE	419	412
SPIKE DUP	431	427
% EXTRACTION ACCURACY	88	86
BLANK	<10	<10
RPD	2.8	3.6

Methods: EPA SW 846-8015M GRO/DRO

  
Ralank K. Tuttle

7-5-01  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TRIDENT ENVIRONMENTAL  
ATTN: MR. GILBERT VAN DEVENTER  
P.O. BOX 7624  
MIDLAND, TEXAS 79708  
FAX: 689-4578

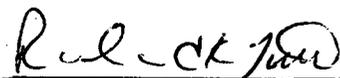
Sample Type: Soil  
Sample Condition: Intact/ Iced/ 1.0 deg C  
Project #: V-105  
Project Name: Duke Energy Field Services  
Project Location: JC #6

Sampling Date: 07/03/01  
Receiving Date: 07/03/01  
Analysis Date: 07/03/01

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
41628	Pipeline Source Area	<0.025	<0.025	<0.025	<0.025	0.054
41629	Floor (10 ft)	<0.025	<0.025	<0.025	<0.025	<0.025
41630	Stockpile A (East)	<0.025	<0.025	<0.025	<0.025	<0.025
41631	Stockpile (B) (Far West)	<0.025	<0.025	<0.025	<0.025	<0.025
41632	Stockpile C (SW)	<0.025	<0.025	<0.025	<0.025	<0.025
41633	Stockpile D (Near West)	<0.025	<0.025	<0.025	<0.025	<0.025

QUALITY CONTROL	0.096	0.094	0.091	0.201	0.093
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% INSTRUMENT ACCURACY	96	94	91	101	93
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	0.097	0.097	0.094	0.212	0.099
SPIKE DUP	0.099	0.099	0.097	0.218	0.101
% EXTRACTION ACCURACY	97	97	94	106	99
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025
RPD	2	2	3	3	2

METHODS: EPA SW 846-8021B ,5030

  
Raland K. Tuttle

7-5-01  
Date



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

V-105-JC6-7/3

# Chain of Custody

Date \_\_\_\_\_ Page \_\_\_\_\_ of \_\_\_\_\_

Lab Name: Environmental Lab of Texas Address: 12600 WI-20 East Odessa, Texas 79765 Telephone: (915) 563-1800				Analysis Request														Number of Containers															
Samplers (SIGNATURES) <i>Dale Littlejohn</i>				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)	DRO (EPA 8015D)	TDS (EPA 160.1)	Anions/Cations	Total Metals		TCLP Metals														
Sample Identification	Matrix	Date	Time																														
Pipeline Source Area	Soil	7/3/01	0835	G	✓								✓	✓														4	1	6	2	8	1
Floor (10 Ft)	"	"	0900	G	✓								✓	✓														4	1	6	2	9	1
Stockpile A (East)	"	"	1202	C	✓								✓	✓														4	1	6	3	0	✓
Stockpile (B) (Far West)	"	"	1215	C	✓								✓	✓														4	1	6	3	1	1
Stockpile C (SW)	"	"	1220	C	✓								✓	✓														4	1	6	3	2	1
Stockpile D (Near West)	"	"	1225	C	✓								✓	✓														4	1	6	3	3	✓
Project Information				Sample Receipt		Relinquished By:				Relinquished By:				Relinquished By:																			
Project Name: Duke Energy Field Services				Total Containers:		(1) (Company)				(2) (Company)				(3) (Company)																			
Project Location: JC#6				COC Seals:		Trident Environmental																											
Project Manager: Gil Van Deventer				Rec'd Good Cond/Cold: 100%		<i>Dale Littlejohn</i>				<i>Dale Littlejohn</i>				<i>Dale Littlejohn</i>																			
Cost Center No.: V-105				Conforms to Records:		<i>Dale Littlejohn</i>				<i>Dale Littlejohn</i>				<i>Dale Littlejohn</i>																			
Shipping ID No.: Hand Delivered to Lab				Lab No.:		7/3/01 1507				7/3/01 1507				7/3/01 1507																			
Bill to (see below):						Environmental Lab of Tx.				Environmental Lab of Tx.				Environmental Lab of Tx.																			
Special Instructions/Comments: Please send invoice direct to client:						<i>Jeanne McMurray</i>				<i>Jeanne McMurray</i>				<i>Jeanne McMurray</i>																			
Duke Energy Field Services, Attention: Steve Weathers						<i>Jeanne McMurray</i>				<i>Jeanne McMurray</i>				<i>Jeanne McMurray</i>																			
P. O. Box 5493, Denver, Colorado 80217						7-3-01 1507				7-3-01 1507				7-3-01 1507																			

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TRIDENT ENVIRONMENTAL  
ATTN: MR. GILBERT VAN DEVENTER  
P.O. BOX 7624  
MIDLAND, TEXAS 79708  
FAX: 689-4578

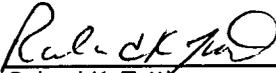
Sample Type: Soil  
Sample Condition: Intact/ Iced/ 1.0 deg C  
Project #: V-105  
Project Name: Duke Energy Field Services  
Project Location: JC #6

Sampling Date: 07/03/01  
Receiving Date: 07/03/01  
Analysis Date: 07/03/01

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg
41623	Floor 13ft	<10	<10
41624	West Wall (11 ft)	<10	<10
41625	East Wall (8 ft)	<10	<10
41626	South Wall (8 ft)	<10	<10
41627	North Wall (8 ft)	<10	<10

QUALITY CONTROL	455	487
TRUE VALUE	500	500
% INSTRUMENT ACCURACY	91	97
SPIKED AMOUNT	476	476
ORIGINAL SAMPLE	<10	<10
SPIKE	419	412
SPIKE DUP	431	427
% EXTRACTION ACCURACY	88	86
BLANK	<10	<10
RPD	2.8	3.6

Methods: EPA SW 846-8015M GRO/DRO

  
Raland K. Tuttle

7-4-01  
Date



**ATTACHMENT C**

**FIELD BOOK NOTES**

## **Jimmy Cooper No. 6 Activity Summary**

Visibly stained soil was observed on both sides (east and west) of the pipeline across an 800 square foot area. The surface soil immediately above the pipeline appeared to consist of a thin layer of caliche, possibly added after the line repairs were made (see Photo 1). Mr. Cooper said the surface soil above the pipeline was salt contaminated natural soil; this however, seems unlikely since any salt contaminated soil immediately above the pipeline would have been removed when the line was repaired.

At 8:00 am CST the stained soil on the east side of the pipeline was excavated to a depth of approximately 3 feet below the surface. Soil samples were recovered and field screened with the PID. All of the samples contained <1-ppm volatile hydrocarbons (VHC). The area directly above the pipeline was then excavated. The line was discovered at a depth of approximately 5 feet below the surface. Soil samples taken directly adjacent to the pipeline contained 118-ppm VHC. The area of stained soil on the west side of the pipeline was excavated to approximately 3 feet. Soil samples at that depth contained <1-ppm VHC.

The pipeline excavation (center) was deepened in an effort to identify the vertical extent of hydrocarbon contamination. A soil sample was recovered at 10 feet below the surface immediately adjacent to the pipeline (Photo 2). The sample contained 67-ppm VHC. The excavation was advanced to 13 feet below the surface and soil samples were recovered with the track-hoe bucket. The samples (both sides of the pipeline) each contained <1-ppm VHC.

The excavation was then widened and cleaned out until soil samples recovered from the bucket on all four sides contained <1-ppm VHC (Photo 3). A grab sample was recovered from the floor of the excavation for laboratory analysis of DRO and GRO. The removed soil to this point (assumed to be contaminated) was segregated to the west of the excavation (Stockpiles "B" and "C") and the walls of the excavation were ramped on all sides to prevent injury to livestock or area workers (Photo 4 and 5). Soil from the ramping operation was placed adjacent to the excavation (Stockpiles "A" and "D").

Four additional grab samples, for laboratory analysis of DRO/GRO, were recovered from the highest VHC concentration areas of the sloped walls following field screening with the PID. The highest reading was observed and sampled on the south wall at approximately 8 feet below the surface (5 ppm). Soil samples for laboratory analysis of BTEX, DRO, and GRO were recovered from each stockpile.

It should be noted that five (5) repair clamps were discovered along the exposed section of pipeline. The northern most was surrounded (within a few inches) with moist, hydrocarbon-impacted soil. Mr. Blackwood (Allstate) indicated that he would contact a local Duke employee to come check the line prior to back-filling the excavation.

Also, Mr. Cooper indicated that he would like to see us analyze soil samples for chloride content. I decided not to do this because the ramping operation had removed all of the soil that he thought was salt-impacted.

The lithology can be summarized as follows:

Surface to 3 feet – Sand, light brown, very fine-grained (dune material)  
3 feet to 6 feet – Sandy Clay, brown, fine grained  
6 feet to 8 feet – Sand and caliche, tan, fine grained sand  
8 feet to 13 feet – Sand with some clay, brown

The laboratory results for the samples recovered inside the excavation (rushed) were completed on Wednesday morning (7/4/01). All of the samples were below the detection limit of 10 mg/kg for DRO and GRO. The results of the stockpile soil should be available by Friday. This information was relayed to Mr. Blackwood (Allstate). Please call me if you have any further questions.

Thanks,

Dale Littlejohn  
(915) 528-3878

7/3/01

WTL

①

0530 Leave Midland Sov JC-6

0724 Arrive at JC-6, check

PID calibration (97.9 ppm)

Photo #1 Stain soil at the surface  
on east & west side  
of fresh caliche covering  
the repaired pipeline

- Spill loc.  $\approx$  550' due north of  
fence line along North-  
South trending line.

0800 Started excavation at east  
stained area, no visible  
contam. PID  $\approx$  1.0 ppm.

- Move to center, exposed  
pipeline, soil on top of  
pipeline contained strong  
odor (PID = 41 ppm) 118 ppm  
in bag

- Moved to west side of line  
begin excavation, took sample  
at  $\approx$  3 ft below stained  
area (PID = < 1.0)

N)  $32^\circ$  34,905'W)  $63^\circ$  16,427'

②

JC 6

7/3/01

WTL

Sample	PID	Time
0- Source	118 ppm	8:35
[Taken at pipeline in center of stained soil area]		
West Wall (Scape)	< 1 ppm - Mid	10:00
	10 ppm - BTM	

0 Floor (10ft)	67 ppm	9:00
+ Floor (13ft)	< 1 ppm	9:20
+ West Wall (11')	< 1 ppm	12:05
+ East Wall (8ft)	< 1 ppm	11:54
0 East Stockpile (A)	< 1 ppm	12:02
<del>+ West Wall (11')</del>		
+ South Wall (8')	5 ppm	12:08
+ North Wall (8')	1 ppm	12:10
0 Stockpile "B"	8 ppm	12:15
0 Stockpile "C"	15 ppm	12:20
0 Stockpile "D"	< 1 ppm	12:25

\* Note - 5 clamps were observed  
on the exposed line.

JTK

7/3/01

JCG

(3)

840 began excavating at Pipeline  
 (5' deep). Floor sample  
 taken at 10 feet (67 ppm)  
 Sample taken at 13 feet (21 ppm)  
 West Wall - 1-10 ppm  
 South Wall (below line)  
 1.2 ppm

1000 Believe to have found the  
 limits of the spill, will  
 clean out hole, then recover  
 final laboratory samples

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## Allstate Equipment

Deere # 650 H Dozer  
 " # 644 H Front loader  
 " # 410 E Backhoe  
 CAT # 325 B Trackhoe

## Trident Equip

PPE wheel  
 PLO Truck 206 miles

\* camera

\* GPS

1200 Cal PLO 98.3 ppm

(4)

7/3/01

DTK

1325 Leave JC-6 for  
 Eng. Labs of Texas

1534 Drive in Midland