

DUKE ENERGY FIELD SERVICES



IRP-67
10/14/05

SITE INVESTIGATION, REMEDIATION, AND FINAL C-141 CLOSURE DOCUMENTATION

G-28 LOOP-2 RELEASE SITE

DEFS REF: G-28 LOOP-2 112002

UL-B (NW¼ OF THE NE¼) OF SECTION 21 T22S R36E

~7.3 MILES WEST-SOUTHWEST (239.2°) OF EUNICE

LEA COUNTY, NEW MEXICO

LATITUDE: N32° 23' 00.03"

LONGITUDE: W103° 15' 58.84"

SEPTEMBER 17, 2003

PREPARED BY: JCG

Environmental Plus, Inc.

2100 Avenue O

P.O. Box 1558

Eunice, NM 88231

Phone: (505)394-3481

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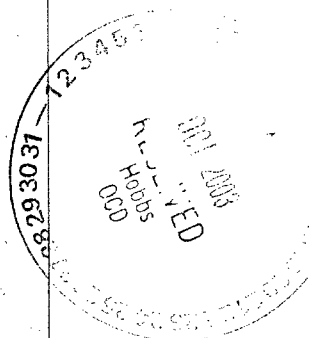
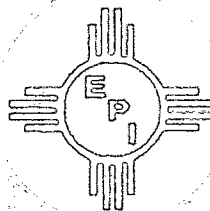


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Project Summary

Site Specific:

- ◆ **Company Name:** Duke Energy Field Services
- ◆ **Facility Name:** G-28 Loop-2 Natural Gas Gathering Pipeline
- ◆ **Project Reference** G-28 Loop-2 112002
- ◆ **Company Contact:** Paul Mulkey
- ◆ **Site Location:** WGS84: N32° 23' 00.03"; W103° 15' 58.84"
- ◆ **Legal Description:** Unit Letter B, (NW¼ of the NE¼), Section 21, T22S, R36E
- ◆ **General Description:** approximately 7.3-miles west-southwest (239.2°) of Eunice, NM
- ◆ **Elevation:** 3537-ft amsl **Depth to Ground Water:** ~165-ft
- ◆ **Land Ownership:** Millard Deck Estate Lessee: Larry Strain
- ◆ **EPI Personnel:** Technical Manager – Pat McCasland
Project Consultant – John Good
Site Foreman – Morris Burkett

Release Specific:

- ◆ **Product Released:** Natural Gas & NGL
- ◆ **Volume Released:** ~250 bbl **Volume Recovered:** 200 bbl
- ◆ **Time of Occurrence:** Unknown **Time of Discovery:** 11:00 AM; 20-Nov-02
- ◆ **Release Source:** 20" steel NG pipeline; integrity lost due to internal corrosion; repaired by clamping with ultimate replacement of section.
- ◆ **Initial Surface Area Affected:** 4,837-ft²

Remediation Specific:

- ◆ **Final Vertical extent of contamination:** 20-ft bgs; Remaining depth to ground water: 145-ft
- ◆ **Water wells within 1000-ft:** 0 **Surface water bodies within 1000-ft:** 0
- ◆ **NMOCD Site Ranking Index:** 0 points (>100-ft to top of water table)
- ◆ **Remedial goals for Soil < 65-ft bgs:** TPH – 5000 ppm; BTEX – 50 ppm; Benzene – 10 ppm; Chlorides – 250 ppm
- ◆ **RCRA Waste Classification:** Exempt
- ◆ **Remediation Option Selected:** a) Excavation and disposal of contaminated soil above NMOCD remedial goals; b) analytical confirmation of bottom-hole and sidewall contaminant levels; c) backfill with clean caliche and final 3-ft layer of clean topsoil.
- ◆ **Disposal Facility:** Environmental Plus, Inc. **Volume disposed of:** 1960-yd³
- ◆ **Project Completion Date:** February 19, 2003
- ◆ **Additional Commentary:** None

1.0 Introduction & Background

This report addresses the site investigation and remediation of the Duke Energy Field Services (DEFS) "G-28 Loop-2 112002" natural gas gathering line remediation site. On November 20, 2002, Environmental Plus, Inc. (EPI) was notified by DEFS regarding a newly discovered natural gas and associated natural gas liquid (NGL) release at this site. The initial C-141 Form submitted to the New Mexico Oil Conservation Division (NMOCD) on November 22, 2002 reports the release volume (NGL) as 250-bbl with 200-bbl recovered. EPI responded the day of the notification and commenced GPS delineation, photography, flow path containment and characterization of the site. The site consisted of a ~4,837 -ft² area with pooled NGL at the Point of Release (POR) and flowing along a dirt road extending east from the POR (*Plate 3, Attachments*). Remediation of this release site consisted of excavation and disposal of 1,960-yd³ of contaminated soil at EPI's approved surface waste facility, soil analyses, backfilling and contouring of the excavation. Remediation of the site was completed on February 19, 2003.

The site is associated with the DEFS G-28 Loop-2 natural gas gathering pipeline. This release site is located in Unit Letter B, (NW¼ of the NE¼), Section 21, T22S, R36E, N32°49'59.66" and W103°19'05.79". It is approximately 7.3-miles west-southwest (239.2°) of Eunice, NM. The property is owned by the Millard Deck Estate. A site location map, site topographical map and a detailed GPS site diagram are included in the Attachments as *Plates 1, 2 and 3*.

The natural gas and associated NGL release at this site was discovered and reported on November 20, 2002. The Initial NMOCD C-141 Form was submitted on November 22, 2002. The leak was the result of internal pipe corrosion. The pipeline was clamped and eventually replaced by DEFS personnel.

2.0 Site Description

2.1 Geological Description

The United States Geological Survey (USGS) Ground-Water Report 6, "Geology and Ground-Water Conditions in Southern Lea County, New Mexico," A. Nicholson and A. Clebsch, 1961, describes the near surface geology of southern Lea County as "an intergrade of the Quaternary Alluvium (QA) sediments, i.e., fine to medium sand, with the mostly eroded Cenozoic Ogallala (CO) formation. Typically, the QA and CO formations in the area are capped by a thick interbed of caliche and generally overlain by sandy soil."

The release site is located in the Eunice Plain physiographic subdivision, described by Nicholson & Clebsch as an area "underlain by a hard caliche surface and is almost entirely covered by reddish-brown dune sand". The thickness of the sand cover ranges from 2-5 feet in most areas to as much as 20-30 feet in drift areas.

2.2 Ecological Description

The area is typical of the Upper Chihuahuan Desert Biome consisting primarily of hummocky sand hills covered with Harvard Shin Oak (*Quercus harvardi*) interspersed with Honey Mesquite (*Prosopis glandulosa*) along with typical desert grasses, flowering annuals and flowering perennials. Mammals represented, include Orrd's and Merriam's Kangaroo Rat, Deer Mouse, White Throated Wood Rat, Cottontail Rabbit, Black Tailed Jackrabbit, Mule Deer, Bobcat, Red Fox and Coyote. Reptiles, Amphibians, and Birds are numerous

and typical of area. A survey of Listed, Threatened, or Endangered species was not conducted.

2.3 Area Ground Water

The unconfined ground water aquifer at this site is projected to be ~165-ft bgs based on water depth data obtained from the NM State Engineers Office data base. Ground water gradient in this area is generally to the east-southeast.

Water Column Report - NM State Engineer Database, 11-21-02									
Well Number	Tws	Rng	Sec	Q	Q	Q	Well Depth	Water Depth	Water Column
763	22S	36E	1	3	2	2	265	137	128
727	22S	36E	5	2	3	1	267	212	55
469	22S	36E	6	3	2	1	220	195	25
70	22S	36E	16	1	2	2	220	170	50
575	22S	36E	27	4	3		198	160	38
(Quarters are: 1=NW, 2=NE, 3=SW, 4=SE - biggest to smallest)									

2.4 Area Water Wells

All recorded wells are greater than 1000 horizontal feet from the site.

2.5 Area Surface Water Features

No surface water bodies exist within 1000 horizontal feet of the site.

3.0 NMOCD Site Ranking

Contaminant delineation and remedial work done at this site indicate that the chemical parameters of the soil and the physical parameters of the ground water were characterized consistent with the characterization and remediation/abatement goals and objectives set forth in the following New Mexico Oil Conservation Division (NMOCD) publications:

- ◆ Guidelines for Remediation of Leaks, Spills and Releases (August 13, 1993)
- ◆ Unlined Surface Impoundment Closure Guidelines (February 1993)

Acceptable thresholds for contaminants/constituents of concern (CoCs), i.e., TPH^{8015m}, Benzene, and the mass sum of Benzene, Toluene, Ethyl Benzene, and total Xylenes (BTEX), was determined based on the NMOCD Ranking Criteria as follows:

- ◆ *Depth to Ground water, i.e., distance from the lower most acceptable concentration to the ground water.*
- ◆ *Wellhead Protection Area, i.e., distance from fresh water supply wells.*
- ◆ *Distance to Surface Water Body, i.e., horizontal distance to all down gradient surface water bodies.*

Based on the proximity of the site to protectable area water wells, surface water bodies, and depth to ground water from the lower most contamination, the NMOCD ranking score for the site is 0 points with the soil remedial goals highlighted in the Site Ranking table presented below.

1. Ground Water	2. Wellhead Protection Area	3. Distance to Surface Water	
Depth to GW <50 feet: 20 points	If <1000' from water source, or; <200' from private domestic water source: 20 points	<200 horizontal feet: 20 points	
Depth to GW 50 to 99 feet: 10 points		200-1000 horizontal feet: 10 points	
Depth to GW >100 feet: 0 points	If >1000' from water source, or; >200' from private domestic water source: 0 points	>1000 horizontal feet: 0 points	
Ground Water Score = 0	Wellhead Protection Score= 0	Surface Water Score= 0	
Site Rank (1+2+3) = 0 + 0 + 0 = 0 points (for soil 0-65'bgs)			
Total Site Ranking Score and Acceptable Remedial Goal Concentrations			
Parameter	20 or >	10	0
Benzene ¹	10 ppm	10 ppm	10 ppm
BTEX ¹	50 ppm	50 ppm	50 ppm
TPH	100 ppm	1000 ppm	5000 ppm

4.0 Subsurface Soil Investigation

During the initial excavation phase of the project the eastward extending flow path was excavated to a depth of 3-ft within the lateral confines of the sunken roadway, and the area near the POR was excavated to a depth of 12-ft bgs. Composite bottom and sidewall samples of both areas were taken on 12/10/02. Results of this sampling indicated that the flow path was adequately clear of contamination to justify closure (maximum TPH concentration of 651 mg/kg in the eastern portion). The 12-ft bottom of the POR excavation displayed a TPH concentration of 3,800 mg/kg. Although this level of contamination was below the 5,000 mg/kg remedial goal, all indications were that the release(s) at this site were historical in nature, and the possibility existed that the TPH contamination level could increase, rather than decrease, below the 12-ft level.

Based on the above assumption, one borehole was drilled in the bottom of the excavation near the POR. The borehole was extended to 30-ft bgs and sampled at the 15, 20, 25 and 30-ft intervals. As seen clearly in *Plate 6*, the TPH concentration did increase to 7,500 mg/kg at the 15-ft depth interval and then dropped down to 148 mg/kg at the 20-ft depth interval.

Based on the borehole sampling results, the POR excavation was extended to a depth of 20-ft and then composite sampled on 1/9/03. Results of this sampling indicated adequate contaminant removal to justify site closure.

5.0 Ground Water Investigation

The projected depth to ground water at this site is 165-ft bgs. Excavation of the site was to a maximum depth of 20-ft. Final CoC levels of the bottom-hole of the excavation were confirmed to be below detection levels for Benzene and BTEX. The TPH concentrations in the 20-ft bottom-hole and in the north, south and east sidewalls were all <100 ppm. The west sidewall retained a TPH

concentration of 275 ppm, still considerably less than the 5000 ppm remedial goal (*Plates 5 and 6, Attachments*). Chlorides and sulfates were below the respective 250 mg/kg and 600 mg/kg ground water standards throughout the site.

The excavation was backfilled with clean caliche and topsoil obtained from the property owner. Based on the removal the Constituents of Concern and adequate depth to ground water, there will be no need for further ground water investigation at this site.

6.0 Remediation Process

Remediation of the site commenced on November 20, 2002 and continued through February 19, 2002. Remedial activities at the site consisted of excavation and disposal of 1,960-yd³ of NGL contaminated soil from the site. All contaminated soil removed from the site was disposed of in the NMOCD approved EPI land farm located south of Eunice, NM. The main POR excavation was backfilled up to 3-feet below surface level with clean caliche purchased from the property owner. The top 3-ft of the excavation was backfilled with clean topsoil obtained on-site to provide an adequate root zone.

The excavations (POR and/or Flow Path) were composite sampled (bottom-hole and sidewalls) on December 10, 2002 and January 9, 2003. Results of the analyses (*Plates 5 and 6, Attachments*) indicate that remedial goals have been achieved in all areas of the excavation.

The surface damaged area encompasses 38,350-ft² (*Plate 3 – Attachments*). This area will be evaluated periodically for the necessity of re-seeding or erosion control.

7.0 Closure Justification

This report documents successful implementation of the Remediation Plan approved by NMOCD for this release site. Soil contaminated above acceptable CoC remedial concentrations was excavated and removed from the location. Disposal of RCRA exempt contaminated soils was at the Environmental Plus, Inc. approved land farm. The excavation was backfilled with clean caliche and topsoil and properly contoured to provide adequate drainage. Based on the data presented in this report, Environmental Plus, Inc., on behalf of Duke Energy Field Services, requests that the NMOCD require “no further action” at this site.

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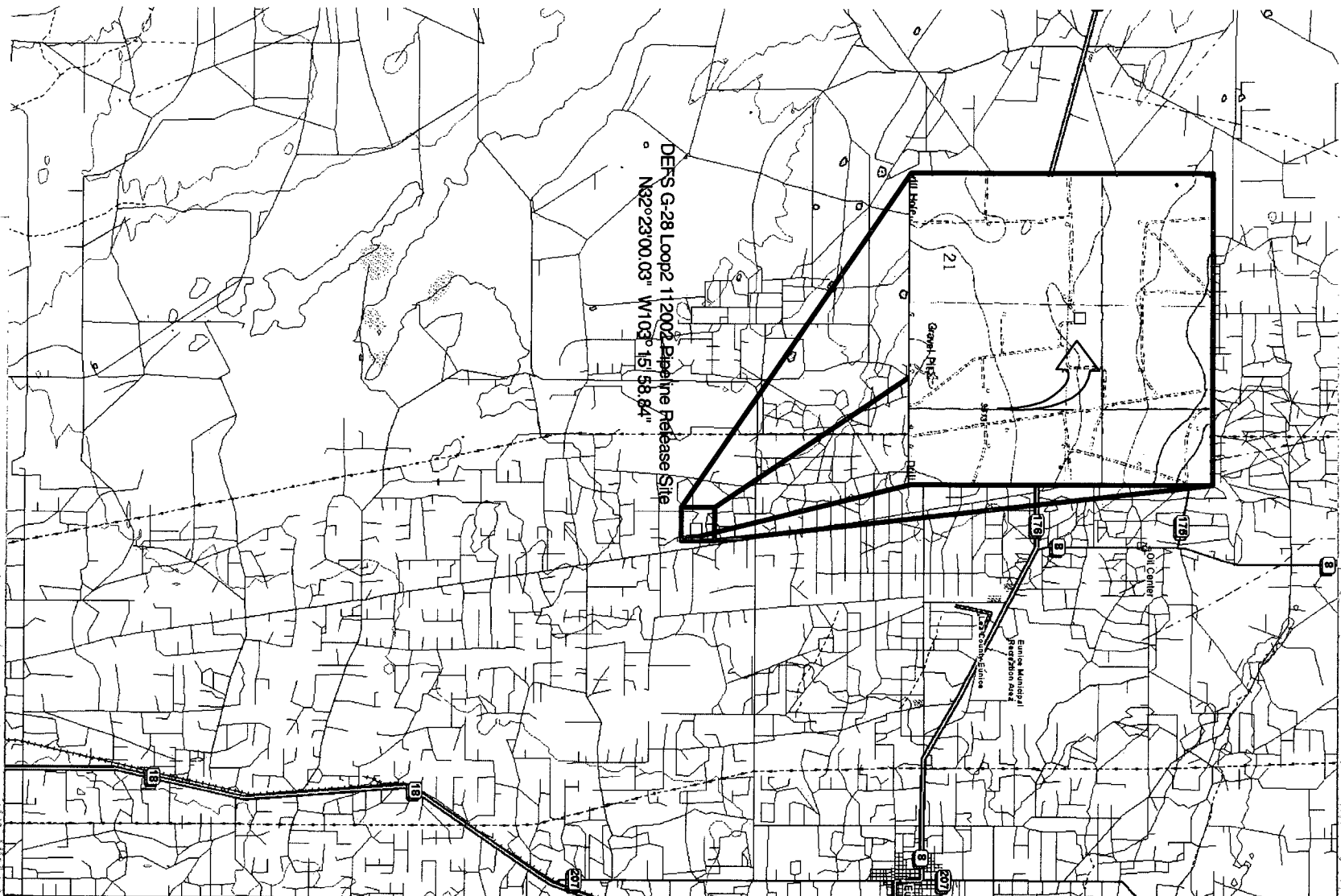


Plate 1 - Release Site Location
Duke Energy Field Services
G-28 Loop-2 - 112002

Lea County, New Mexico
UL-B Section 21 T22S R36E
N32° 23' 00.03" W103° 15' 58.84"
Elevation: 3537-ft amsl

DWG BY: John Good
NOVEMBER - 2002

REVISED:
JULY - 2003

SCALE:
0 5
Miles

SHEET
1 of 1



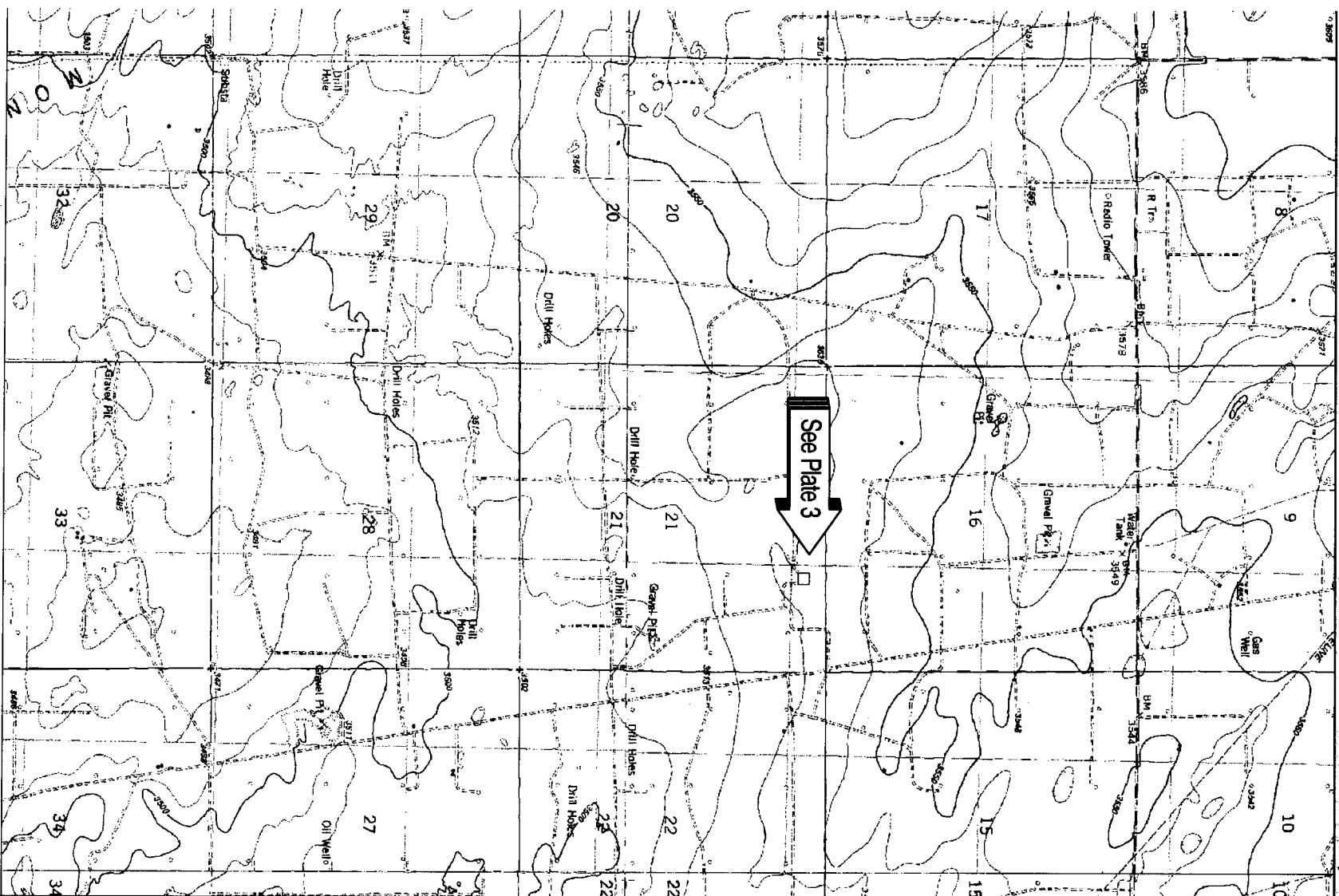


Plate 2 - Release Site Topography
Duke Energy Field Services
G-28 Loop-2 - 112002

Lea County, New Mexico
UL-B Section 21 T22S R36E
N32° 23' 00.03" W103° 15' 58.84"
Elevation: 3537-ft amsl

DWG BY: John Good
NOVEMBER - 2002

REVISED:
JULY - 2003

SCALE:
0 Mile 1

SHEET
1 of 1



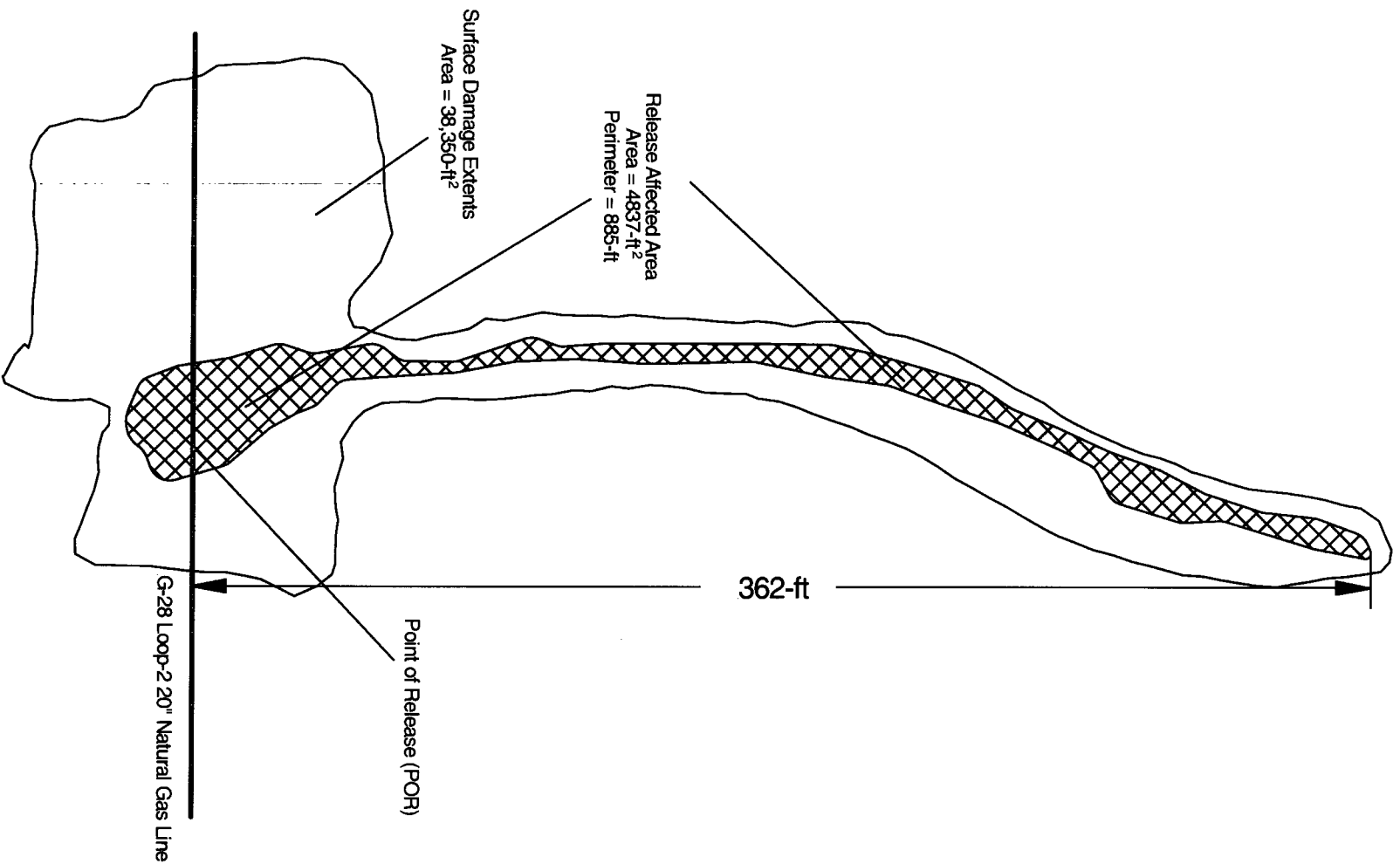




Plate 3 - Initial and Final GPS Demarcations Duke Energy Field Services G-28 Loop-2 - 112002	Lea County, New Mexico UL-B Section 21 T22S R36E N32° 23' 00.03" W103° 15' 58.84" Elevation: 3537-ft amsl	DWG BY: John Good	REVISED:	
		NOVEMBER - 2002	JULY - 2003	
		SCALE: 		

Plate 4: Soil Analytical Data Table

Duke Energy Field Services - G-28 Loop-2 112002 - Excavation Sampling Results														
highlighted cells indicate values in excess of the NMOCD remedial action guideline thresholds: TPH = 5000 mg/Kg; Benzene = 10 mg/Kg; BTEX = 50 mg/Kg; Cl = 250 ppm; SO4 = 600 ppm														
Sample Date	Excavation Sampling Area	Depth (ft - bgs ¹)	SAMPLE ID#	GRO ³ mg/Kg	DRO ⁴ mg/Kg	TPH ⁵ mg/Kg	BTEX ⁶ mg/Kg	Benzene mg/Kg	Toluene mg/Kg	Ethyl Benzene mg/Kg	Total Xylenes mg/Kg	Cl ⁻ mg/Kg	SO4 mg/Kg	pH
12/10/02	BottomHole Comp	12-ft	SDG28L2121002BHC-12	1910	1911	3821	76,529	0.489	8.640	11.300	56,100	160	111.0	6.68
12/10/02	South SideWall Comp	10-12-ft	SDG28L2121002SSWC-12	10	62	72	0.277	0.005	0.081	0.037	0.154			
12/10/02	North SideWall Comp	10-12-ft	SDG28L2121002NSWC-12	10	10	20	0.103	0.005	0.014	0.014	0.070			
12/10/02	East SideWall Comp	10-12-ft	SDG28L2121002ESWC-12	10	60	70	0.030	0.005	0.005	0.005	0.015			
12/10/02	West SideWall Comp	10-12-ft	SDG28L2121002WSWC-12	10	51	61	0.030	0.005	0.005	0.005	0.015			
12/10/02	West FP BottomHole	3-ft	SDG28L2121002FPWBHC	10	397	407	0.462	0.005	0.036	0.064	0.357	144	148.0	6.70
12/10/02	West FP South Sidewall	3-ft	SDG28L2121002FPWSSW	10	53	63	0.030	0.005	0.005	0.005	0.015			
12/10/02	West FP North Sidewall	3-ft	SDG28L2121002FPWNSW	10	40	50	0.034	0.005	0.005	0.005	0.019			
12/10/02	Middle FP BottomHole	3-ft	SDG28L2121002FPMBHC	10	146	156	0.030	0.005	0.005	0.005	0.015	192	34.5	6.97
12/10/02	Middle FP South Sidewall	3-ft	SDG28L2121002FPMSSW	10	18	28	0.030	0.005	0.005	0.005	0.015			
12/10/02	Middle FP North Sidewall	3-ft	SDG28L2121002FPMNSW	10	12	22	0.053	0.005	0.005	0.008	0.035			
12/10/02	East FP BottomHole	3-ft	SDG28L2121002FPEBHC	11	640	651	0.030	0.005	0.005	0.005	0.015	192	29.2	7.00
12/10/02	East FP South Sidewall	3-ft	SDG28L2121002FPESW	10	573	583	0.030	0.005	0.005	0.005	0.015			
12/10/02	East FP North Sidewall	3-ft	SDG28L2121002FPENSW	10	125	135	0.030	0.005	0.005	0.005	0.015			
12/19/02	BottomHole Comp	15-ft	SDG28L2121902BHC-15	1900	5600	7500	146,219	0.819	24,200	23,000	96,200			
1/3/03	BoreHole (Center Hole)	20-ft	SDG28L21302CBH-20	10	138	148	0.030	0.005	0.005	0.005	0.015	112	408.0	
1/3/03	BoreHole (Center Hole)	25-ft	SDG28L21302CBH-25	10	10	20	0.030	0.005	0.005	0.005	0.015	80	73.1	
1/3/03	BoreHole (Center Hole)	30-ft	SDG28L2121902BHC-30	10	22	32	0.030	0.005	0.005	0.005	0.015	96	91.4	
1/9/03	BottomHole Comp	20-ft	SDG28L2010903BHC-20	10	22	32	0.030	0.005	0.005	0.005	0.015	128	77.9	
1/9/03	South SideWall Comp	15-20-ft	SDG28L2010903SSWC	10	88	98	0.030	0.005	0.005	0.005	0.015	96	24.4	
1/9/03	East SideWall Comp	15-20-ft	SDG28L2010903NSWC	10	32	42	0.030	0.005	0.005	0.005	0.015	112	246.0	
1/9/03	North SideWall Comp	15-20-ft	SDG28L2010903ESWC	10	38	48	0.030	0.005	0.005	0.005	0.015	128	49.4	
1/9/03	West SideWall Comp	15-20-ft	SDG28L2010903WSWC	10	265	275	0.030	0.005	0.005	0.005	0.015	112	122.0	

bgs = below ground surface

³ GRO - Gasoline Range Organics (Detection Limit = 10 mg/Kg)

⁴ DRO - Diesel Range Organics (Detection Limit = 10 mg/Kg)

TPH - Total Petroleum Hydrocarbon (GRO+DRO)

⁶ BTEX = Sum of CoC's (Detection Limits = 0.005 mg/Kg; 0.015 mg/Kg)

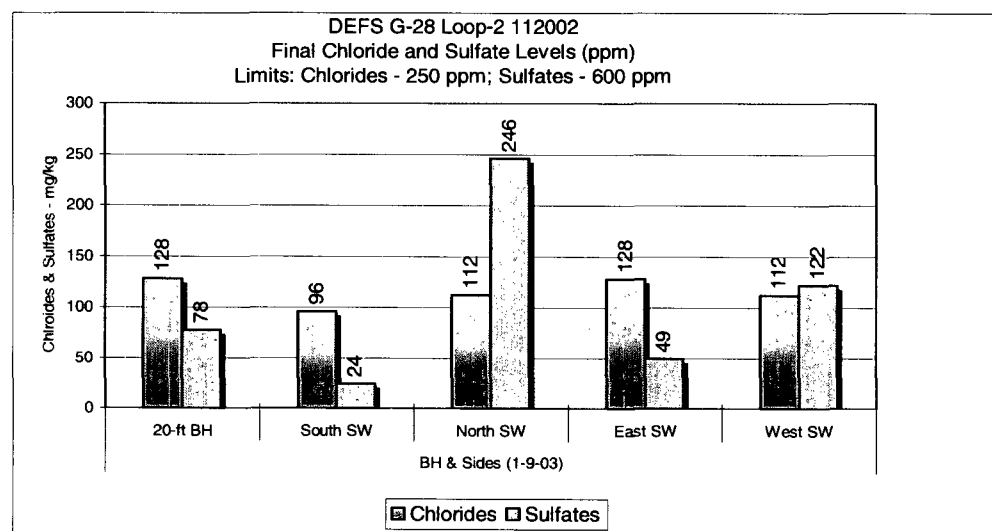
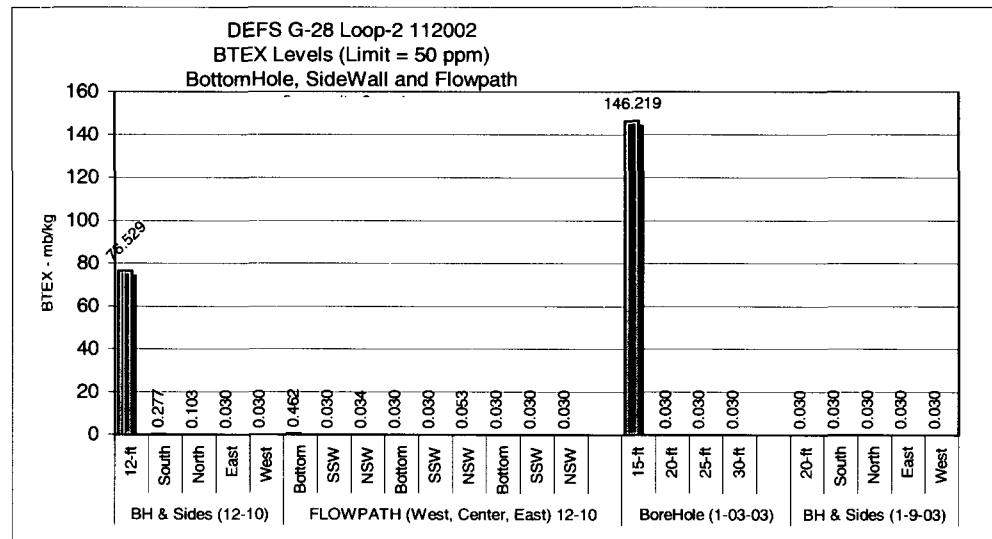
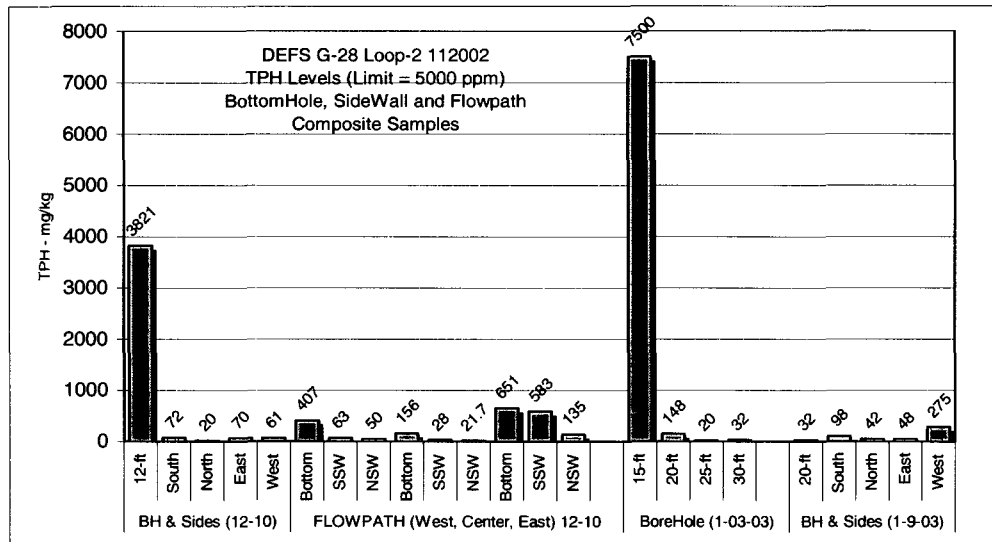
Note: Reported detection limits are considered "de minimus" values and are included in the TPH and BTEX summations.

¹ bgs = below ground surface ³ GRO - Gasoline Range Organics (Detection Limit = 10 mg/Kg) ⁴ DRO - Diesel Range Organics (Detection Limit = 10 mg/Kg)

⁵ TPH - Total Petroleum Hydrocarbon (GRO+DRO) ⁶ BTEX = Sum of CoCs (Detection Limits = 0.005 mg/Kg; 0.015 mg/Kg)

Note: Reported detection limits are considered "de minimus" values and are included in the TPH and BTEX summations.

Plate 5: Soil Analytical Data Bar Charts



Laboratory Analytical Data



PHONE (915) 873-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

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ANALYTICAL RESULTS FOR
ENVIRONMENTAL PLUS, INC.

ATTN: JOHN GOOD

P.O. BOX 1558

EUNICE, NM 88231

FAX TO: (505) 394-2601

Receiving Date: 12/10/02

Reporting Date: 12/13/02

Project Owner: DUKE ENERGY FIELD SERVICES

Project Name: G28 LOOP2 112002

Project Location: UL-B SECTION 21 T22S R36E

Sampling Date: 12/10/02

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: BC

Analyzed By: BC

LAB NO.	SAMPLE ID	GRO (C ₈ -C ₁₀) (mg/Kg)	DRO (C ₁₀ -C ₂₈) (mg/Kg)	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE:		12/11/02	12/11/02	12/11/02	12/11/02	12/11/02	12/11/02
	SDG28L2121002BHC-12	1910	6400	0.489	8.64	11.3	56.1
	SDG28L2121002SSWC-12	<10.0	61.9	<0.005	0.081	0.037	0.154
	SDG28L2121002NSWC-12	<10.0	<10.0	<0.005	0.014	0.014	0.070
	SDG28L2121002ESWC-12	<10.0	69.5	<0.005		<0.005	
	SDG28L2121002WSWC-12	<10.0	51.2				
	SDG28L2121002FPWBHC		397	<0.005		0.064	
H7300-7	SDG28L2121002FPWSSW		52.6	<0.005	<0.005	<0.005	<0.015
H7300-8	SDG28L2121002FPWNSW	<10.0	39.7	<0.005	<0.005	<0.005	0.019
H7300-9	SDG28L2121002FPMBHC	<10.0	148	<0.005	<0.005	<0.005	<0.015
H7300-10	SDG28L2121002FPMSSW	<10.0	17.5	<0.005	<0.005	<0.005	<0.015
H7300-11	SDG28L2121002FPMNSW	<10.0	11.7	<0.005	<0.005	0.008	0.035
H7300-12	SDG28L2121002FPEBHC	11.4	640	<0.005	<0.005	<0.005	<0.015
H7300-13	SDG28L2121002FPESSW	<10.0	573	<0.005	<0.005	<0.005	
H7300-14	SDG28L2121002FPENSW	<10.0	126	<0.005			
Quality Control		802	857	0.098	0.094	0.091	0.287
True Value QC		800	800	0.100		0.100	
% Recovery		100.0	107	97.5		90.6	88.9
Relative Percent Difference		10.2				0.2	0.6

METHODS: TPH GRO & DRO - EPA SW-846 8015 M; BTEX - SW-846 8260.

Burgess J. A. Cooke, Ph. D.

12/13/02

Date

H7300A.XLS

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



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ANALYTICAL RESULTS FOR
ENVIRONMENTAL PLUS, INC.

ATTN: JOHN GOOD

P.O. BOX 1558

EUNICE, NM 88231

FAX TO: (505) 394-2601

Receiving Date: 12/10/02

Reporting Date: 12/16/02

Project Owner: DUKE ENERGY FIELD SERVICES

Project Name: G28 LOOP2 112002

Project Location: UL-B SECTION 21 T2S R36E

Sampling Date: 12/10/02

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: BC

Analyzed By: AH

LAB NUMBER	SAMPLE ID	Cl ⁻ (mg/Kg)	SO ₄ (mg/Kg)	pH (s.u.)
ANALYSIS DATE		12/13/02	12/13/02	12/13/02
H7300-1	SDG28L2121002BHC-12	160	111	6.68
H7300-6	SDG28L2121002FPWBHC	144	148	6.70
H7300-9	SDG28L2121002FPMBHC		34.5	6.97
H7300-12	SDG28L2121002FPEBHC		29.2	7.00
Quality Control		970	50.20	6.75
True Value QC		100	50.00	7.00
% Recovery			100	96.4
Relative Percent Difference			0.7	0.1
METHODS: 600/4-79-020		4500-Cl ⁻ B*	375.4	150.1

*Standard Methods

Note: Analyses performed on 1:4 w:v aqueous extracts.

Amy Hill
Chemist

12-16-02
Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
 ENVIRONMENTAL PLUS, INC.
 ATTN: JOHN GOOD
 P.O. BOX 1558
 EUNICE, NM 88231
 FAX TO: (505) 394-2601

Receiving Date: 12/20/02
 Reporting Date: 12/26/02
 Project Owner: DUKE ENERGY FIELD SERVICES
 Project Name: G28 LOOP2 112002
 Project Location: UL-B SECTION 21 T22S R36E

Sampling Date: 12/19/02
 Sample Type: SOIL
 Sample Condition: COOL & INTACT
 Sample Received By: BC
 Analyzed By: BC

LAB NO. SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (C ₁₀ -C ₂₈) (mg/Kg)	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE:	12/23/02	12/23/02	12/23/02	12/23/02	12/23/02	12/23/02
H7348-1 SDG28L2121902BHC-15	1900	5600	0.819	24.2	23.0	98.2
Quality Control	762	847	0.108	0.100	0.104	0.306
	800	800	0.100	0.100	0.100	0.300
	95.2	108	108	100	104	102.0
	12.5	2.7	6.1	1.9	5.5	5.7

METHODS: TPH GRO & DRO - EPA SW-846 8015 M; BTEX - SW-846 8260.

Burgess J. A. Cooke, Ph. D.

12/26/02
 Date

H7348.XLS

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101 East Marland, Hobbs, NM 88240
505-393-2326 Fax 505-393-2476

2111 Beechwood, Abilene, TX 79603
915-673-7001 Fax 915-673-7020

[illegible]



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
 ENVIRONMENTAL PLUS, INC.
 ATTN: JOHN GOOD
 P.O. BOX 1558
 EUNICE, NM 88231
 FAX TO: (505) 394-2601

Receiving Date: 01/03/03
 Reporting Date: 01/07/03
 Project Number: DUKE ENERGY FIELD SERVICES
 Project Name: G-28 LOOP 2
 Project Location: NOT GIVEN

Sampling Date: 01/03/03
 Sample Type: SOIL
 Sample Condition: COOL & INTACT
 Sample Received By: BC
 Analyzed By: BC

LAB NO.	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (C ₁₀ -C ₂₈) (mg/Kg)	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE:		01/06/03	01/06/03	01/06/03	01/06/03	01/06/03	01/06/03
H7376-1	SDG28L21302CBH-20'	<10.0	138	<0.005	<0.005	<0.005	<0.015
H7376-2	SDG28L21302CBH-25'	<10.0	<10.0	<0.005	<0.005	<0.005	<0.015
H7376-3	SDG28L21302CBH-30'	<10.0	22.0	<0.005	<0.005	<0.005	<0.015
Quality Control		769	799	0.089	0.094	0.097	0.284
True Value QC		800	800	0.100	0.100	0.100	
% Recovery		96.1	99.9	88.9	94.2	97.1	
Relative Percent Difference		0.5	1.0	3.9	3.7	10.6	

METHODS: TPH GRO & DRO - EPA SW-846 8015 M; BTEX - SW-846 8260.

Burgess J. A. Cooke
 Burgess J. A. Cooke, Ph.D.

1/7/03
 Date

H7376BT.XLS

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PHONE (815) 873-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2328 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
ENVIRONMENTAL PLUS, INC.
ATTN: JOHN GOOD
P.O. BOX 1558
EUNICE, NM 88231
FAX TO: (505) 394-2601

Receiving Date: 01/03/03
Reporting Date: 01/06/03
Project Owner: DUKE ENERGY FIELD SERVICES
Project Name: G-28 LOOP 2
Project Location: NOT GIVEN

Sampling Date: 01/03/03
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: AH

LAB NUMBER	SAMPLE ID	CF	SO ₄
		(mg/Kg)	(mg/Kg)
ANALYSIS DATE		01/06/03	01/06/03
H7376-1	SDG28L21302CBH-20'	112	408*
H7376-2	SDG28L21302CBH-25'	80	73.1
H7376-3	SDG28L21302CBH-30'	96	91.4
Quality Control		980	50.20
True Value QC		1000	50.00
% Recovery		98.0	100
Relative Percent Difference		2.0	0.7

METHODS: 600/4-79-020

4500-CFB*

375.4

*Standard Methods

Note: Analyses performed on 1:4 w:v aqueous extracts.

* Matrix interference (color) observed.

[Signature]

Chemist

1-6-03

Date

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3005 101 East Main Ave, Hobbs, NM 88240
 (915) 673-7020 Fax (915) 673-7020 (505) 393-2326 Fax (505) 393-2476

Company Name: ENVIRONMENTAL D&S
 Project Manager: John Good
 Address: 2100 Ave O
 City: Edmore State: N.M. Zip: 88231
 Phone #: 505-394-3481 Fax #: 505-394-2601
 Project #: _____ Project Owner: Duke Energy
 Project Name: G-28 Loop 2
 Project Location: _____
 Sampler Name: Bradley Blewett

BILL TO

ANALYSIS REQUEST

Lab I.D.	Sample I.D.	GLASS OR (COMP.) CONTAINERS	MATRIX					PRESERV		SAMPLING		DATE	TIME										
			GROUNDWATER	WASTEWATER	SOIL	CRUDE OIL	SLUDGE	OTHER:	ACID/BASE	ICE/COOL	OTHER:												
<u>ND376</u>	<u>SDG28L21302CBH-20</u>	<u>G1</u>			<u>X</u>				<u>X</u>			<u>1-3-03</u>	<u>8:00</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>						
<u>2</u>	<u>SDG28L21302CBH-25</u>	<u>G1</u>			<u>X</u>				<u>X</u>			<u>1-3-03</u>	<u>8:15</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>						
<u>2</u>	<u>SDG28L21302CBH-30</u>	<u>G1</u>			<u>X</u>				<u>X</u>			<u>1-3-03</u>	<u>8:35</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>						

TPH 5016
BTEX 5026
Chloride 504

Lab Note: Utility and Storage. Cardinal's liability and client's retention remain for any data entry whether based in contract or tort, shall be limited to the amount paid by the client for the above. All data including those for negligence and any other cause whatsoever shall be deemed correct unless made in writing and received by Cardinal within 30 days after completion of the applicable job. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruption, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or contractors arising out of or related to the performance of services furnished by Cardinal, regardless of whether such data is based upon any of the above stated reasons or otherwise.

Sampler Relinquished: Bradley Blewett Date: 1-3-03 Time: 4:00
 Relinquished By: John Good Date: 1-3-03 Time: 4:35
 Delivered By: (Circle One) UPS Bus Other:
 Sample Condition: Good Intact
 Checked By: Benjamin (Initials)
 Phone Result: ☐ Yes ☐ No Add'l Phone #: _____
 Fax Result: ☐ Yes ☐ No Add'l Fax #: _____
 REMARKS:

† Cardinal cannot accept verbal changes. Please fax written changes to 505-



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
ENVIRONMENTAL PLUS, INC.
ATTN: JOHN GOOD
P.O. BOX 1558
EUNCE, NM 88231
FAX TO: (505) 394-2601

Receiving Date: 01/09/03
Reporting Date: 01/11/03
Project Owner: DUKE ENERGY FIELD SERVICES
Project Name: G-28 LOOP 2 112002
Project Location: UL-B SEC21 T2S R38E

Sampling Date: 01/09/03
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

LAB NO.	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (C ₁₀ -C ₂₈) (mg/Kg)	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE:		01/10/03	01/10/03	01/09/03	01/09/03	01/09/03	01/09/03
H7389-1	SDG28L2010903BHC-20	<10.0	21.7	<0.005	<0.005	<0.005	<0.015
H7389-2	SDG28L2010903SSWC		87.6	<0.005	<0.005	<0.005	<0.015
H7389-3	SDG28L2010903ESWC		32.0	<0.005	<0.005	<0.005	<0.015
H7389-4	SDG28L2010903NSWC		38.4	<0.005	<0.005	<0.005	<0.015
H7389-5	SDG28L2010903WSWC		265	<0.005	<0.005	<0.005	<0.015
Quality Control		773	813	0.109	0.100	0.101	0.296
True Value QC		800	800	0.100	0.100	0.100	0.300
		86.6	102	109	99.8	101	98.5
		7.5	1.7	11.0	2.2	1.3	1.2

METHODS: TPH GRO & DRO - EPA SW-846 8015 M; BTEX - SW-846 8260.

Buyer's Copy
J. A. Cooke, Ph. D.

1/11/03
Date

H7389BT.XLS

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ANALYTICAL RESULTS FOR
ENVIRONMENTAL PLUS, INC.
ATTN: JOHN GOOD
P.O. BOX 1558
EUNICE, NM 88231
FAX TO: (505) 394-2601

Receiving Date: 01/09/03
Reporting Date: 01/10/03
Project Owner: DUKE ENERGY FIELD SERVICES
Project Name: G-28 LOOP 2 112002
Project Location: UL-B SEC21 T22S R36E

Sampling Date: 01/09/03
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: AH

LAB NUMBER	SAMPLE ID	Cl	SO ₄
		(mg/Kg)	(mg/Kg)
ANALYSIS DATE		01/10/03	01/10/03
H7389-1	SDG28L2010903BHC-20	128	77.9
H7389-2	SDG28L2010903SSWC	96	24.4
H7389-3	SDG28L2010903ESWC	112	246
H7389-4	SDG28L2010903NSWC	128	49.4
H7389-5	SDG28L2010903WSWC	112	122
Quality Control		980	50.20
True Value QC		1000	50.00
% Recovery		98.0	100
Relative Percent Difference		2.0	0.7

METHODS: 600/4-79-020 4500-ClB* 375.4

*Standard Methods

Note: Analyses performed on 1:4 w/v aqueous extracts.

Amy Hill
Chemist

1-10-03
Date

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505-393-2326 Fax 505-393-2478

2111 Beechwood, Abilene, TX 79603
915-673-7001 Fax 915-673-7020

Duke Energy Field Services

District I

1625 N. French Dr., Hobbs, NM 88240

District II

1301 W. Grand Avenue, Artesia, NM 88210

District III

1000 Rio Brazos Road, Aztec, NM 87410

District IV

1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141

Revised June 10, 2003

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	Contact	Paul Mulkey
Address	11525 W. Carlsbad Hwy. Hobbs, NM 88240	Telephone No.	505-397-5716
Facility Name	G-28 Loop-2 112002	Facility Type	Natural Gas Gathering Pipeline
Surface Owner	Millard Deck Estate	NA	Lease No. NA

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from South Line	Feet from West Line	Longitude	Latitude	County:
B	21	22S	36E	4900	3650	W103:15:58.84	N32:23:00.03	Lea

NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered
Natural Gas release and associated NGL's	250 bbl	200 bbl
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
G-28 Loop-2 20" Steel Pipeline	Unknown	11/20/02-11:00 AM
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Larry Johnson; NMOCD-Hobbs	
By Whom? Stan Shaver - DEFS	Date and Hour	11/20/02-11:30 AM
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. NA	

If a Watercourse was Impacted, Describe Fully.*

NA

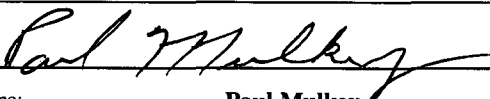
Describe Cause of Problem and Remedial Action Taken.*


Corroded pipeline, initially repaired with clamp then section replaced

Describe Area Affected and Cleanup Action Taken.*

~4837-ft² surface area affected (632-ft East from POR). ~250-bbl of NGL released; 200-bbl recovered. 1,960-yd³ of RCRA Exempt Non-hazardous contaminated soil was excavated and disposed of by EPI. Maximum excavation depth was 20-ft bgs. Excavated soil was replaced with clean backfill.

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: Paul Mulkey	Approved by District Supervisor:	
Title: Construction/Maintenance Superintendent	Approval Date:	Expiration Date:
E-mail Address: pdmulkey@duke-energy.com	Conditions of Approval:	
Date: 9/17/03 Phone: 505-397-5716	<input type="checkbox"/> Attached.	

		Incident Date and NMOCD Notified?	
		11/20/02-11:00 AM	11/20/02-11:30 AM
SITE: G-28 Loop-2 112002		Assigned Site Reference # 112002	
Company:		DUKE ENERGY FIELD SERVICES	
Street Address:		5805 East Highway 80	
Mailing Address:		11525 W. Carlsbad Hwy.	
City, State, Zip:		Hobbs, NM 88240	
Representative:		Paul Mulkey	
Representative Telephone:		505-397-5716	
Telephone:			
Fluid volume released (bbls):		250	Recovered (bbls): 200
>25 bbls: Notify NMOCD verbally within 24 hrs and submit form C-141 within 15 days.			
5-25 bbls: Submit form C-141 within 15 days (Also applies to unauthorized releases of 50-500 mcf Natural Gas)			
Leak, Spill, or Pit (LSP) Name:		# 112002	
Source of contamination:		G-28 Loop-2 20" Steel Pipeline	
Land Owner, i.e., BLM, ST, Fee, Other:		Millard Deck Estate Harding & Carbone, Inc., 3903 Belair Blvd, Houston, TX 77025	
LSP Dimensions:		~600-ft east flowpath (GPS Site Diagram attached)	
LSP Area:		4,837 -ft ²	
Location of Reference Point (RP):			
Location distance and direction from RP:			
Latitude:		N32:23:00.03	
Longitude:		W103:15:58.84	
Elevation above mean sea level:		3537 -ft amsl	
Feet from South Section Line:		4900	
Feet from West Section Line:		3650	
Location - Unit and 1/4 1/4:		UL- B	NE 1/4 of NE 1/4
Location - Section:		21	
Location - Township:		22S	
Location - Range:		36E	
Surface water body within 1000' radius of Site:		0	
Surface water body within 1000' radius of Site:		0	
Domestic water wells within 1000' radius of Site:		0	
Domestic water wells within 1000' radius of Site:		0	
Agricultural water wells within 1000' radius of Site:		0	
Agricultural water wells within 1000' radius of Site:		0	
Public water supply wells within 1000' radius of Site:		0	
Public water supply wells within 1000' radius of Site:		0	
Depth (ft) from land surface to ground water (DG):		165	
Depth (ft) of contamination (DC):		20	
Depth (ft) to ground water (DG - DC = DtGW):		145	
1. Ground Water		2. Wellhead Protection Area	3. Distance to Surface Water Body
If Depth to GW <50 feet: 20 points		If <1000' from water source, or, <200' from private domestic water source: 20 points	<200 horizontal feet: 20 points
If Depth to GW 50 to 99 feet: 10 points			200-100 horizontal feet: 10 points
If Depth to GW >100 feet: 0 points		If >1000' from water source, or, >200' from private domestic water source: 0 points	>1000 horizontal feet: 0 points
Ground water Score: 0		Wellhead Protection Area Score: 0	Surface Water Score: 0
Site Rank (1+2+3) = 0			
Total Site Ranking Score and Acceptable Concentrations			
Parameter	20 or >	10	0
Benzene ¹	10 ppm	10 ppm	10 ppm
BTEX ¹	50 ppm	50 ppm	50 ppm
TPH	100 ppm	1000 ppm	5000 ppm

¹ 100 ppm field VOC headspace measurement may be substituted for lab analysis

District I

1625 N. French Dr., Hobbs, NM 88240

District II

1301 W. Grand Avenue, Artesia, NM 88210

District III

1000 Rio Brazos Road, Aztec, NM 87410

District IV

1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural ResourcesOil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-138

Revised March 17, 1999

Submit 2 Copies to appropriate

District Office in accordance

with Rule 116 on back

side of form

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input checked="" type="checkbox"/> Non-Exempt: <input type="checkbox"/>	4. Generator: DUKE ENERGY FIELD SERVICES
Verbal Approval Received?: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5. Originating Site Designation: G-28 Loop-2 112002 # 112002
2. Management Facility Designation: Environmental Plus, Inc. Land Farm #NM-01-0013	6. Transporter: Environmental Plus, Inc.
3. Address of Facility Operator: 2100 Avenue O, P.O. Box 1558, Eunice, NM 88231	7. State New Mexico
8. Location of Material (Street Address or ULSTR) UL- B Section 21 T 22S R 36E	
9. Circle One: <div style="display: flex; flex-direction: column; align-items: flex-start;"><div>A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste status from the Generator; one certificate per job.</div><div>B. All requests for approval to accept non-exempt wastes must be accompanied by the necessary chemical analysis to PROVE the material is non-hazardous and the Generator's certification of origin. No waste classified as "HAZARDOUS" by listing or testing shall be approved.</div></div> <p>All transporters must certify the wastes delivered are only those consigned for transport.</p>	

BRIEF DESCRIPTION OF MATERIAL:

**Contaminated Soil(s): hydrocarbon release involving -
Natural Gas release and associated NGL's**Estimated Volume: **1500** yd³Known volume (to be entered by the operator at the end of the haul: (yd³)**1960** yd³SIGNATURE: 

Waste Management Facility Authorized Agent

TITLE: **EPI Environmental Consultant** DATE: **11/22/02**TYPE OR PRINT NAME: **John Good**TELEPHONE NO.: **505-394-3481** FAX: **505-394-2601**

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: _____

APPROVED BY: _____ TITLE: _____ DATE: _____

Environmental Plus, Inc.

Environmental Services & Land Farm

Permit # NM-01-0013

Micro-Blaze**Certificate of Waste Status****"RCRA Exempt Waste"**Company: **DUKE ENERGY FIELD SERVICES**Origin: UL or ¼ ¼: **B** Section: **21** Township: **22S** Range: **36E**Source Description (Pipeline, Lease, Battery, Flowline, etc.) **Natural Gas Gathering Pipeline****G-28 Loop-2 20" Steel Pipeline**

"As a condition of acceptance for disposal, I hereby certify that this waste is an **exempt** waste as defined by the Environmental Protection Agency (EPA) July 1988 Regulatory Determination and to my knowledge, this waste been characterized as "non-hazardous" pursuant to the provisions of EPA 40 CFR Part 261 Subpart C and has not been comingled with an EPA 40 CFR Part 261 Subpart D "Listed Waste."

NORM Exposure Rate: **< 50** µR/HourI, Paul Mulkey, the undersigned agent for**DUKE ENERGY FIELD SERVICES**,

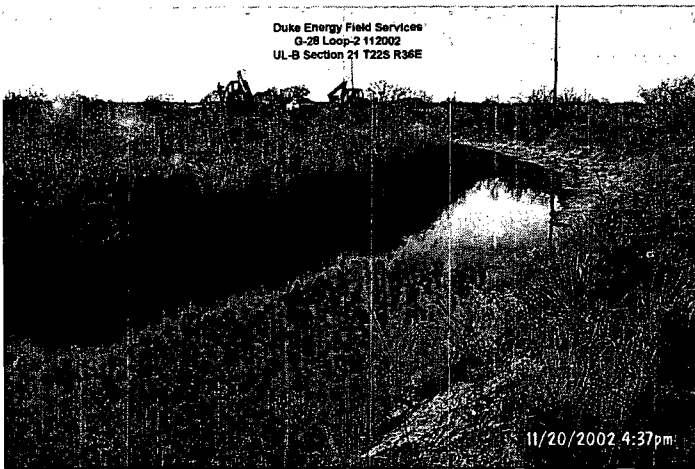
hereby certify that, based on personal knowledge,
the above statement is true and correct.

Name
Title
Address

Paul Mulkey
Construction/Maintenance Superintendent
11525 W. Carlsbad Hwy.
Hobbs, NM 88240

Signature
Date

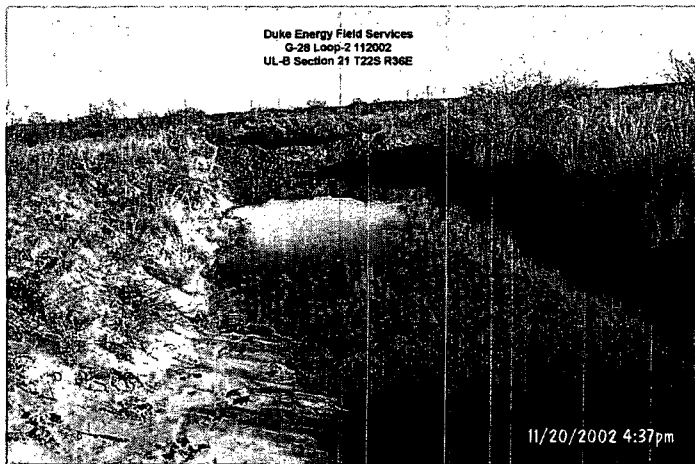
Paul Mulkey
Friday, November 22, 2002



Initial Response: flow path, east to west angle



Initial Response: east extent of flow path, W to E



Initial Response: flow path, west to east angle



Initial Response: Clamping POR



Initial Response: Clamping POR

