		S	ITE INFO	RM	ATION			
		Re	port Type	: W	ork Pl	an	<del>- `</del>	
General Site I	nformation:				F. M. O.			
Site:		Mobil 22 F	ederal #6 We	ell Site	е			
Company:		Stephens &	& Johnson O	perati	ing Co.			
Section, Town	nship and Range	Unit K	Sec 22		T 26S	R 29E		
Lease Number	er:	API-30-015				(20)		
County:		Eddy Cour	The second name of the local n				**********	
GPS:			32.02664°	N			103.9	7332° W
Surface Owne		Federal						
Mineral Owne	er:	F						
Directions:		rrom the inte	From the intersection of Hwy 285 and Whitehorn Rd, travel on Whitehorn Rd for 7.8 miles, turn south onto location.					
		- South office to	cation.					
Release Data:								
Date Released		Unknown						
Type Release:		Produced W	/ater					
Source of Con		Illegal Dumping						
Fluid Released	· · · · · · · · · · · · · · · · · · ·	Unknown						
Fluids Recover	The state of the s	None						
Official Comm	unication:	Part of the Control o						
Name:	William M. Kincaid					Ike Tavare	Z	
Company:	Stephens & Johnson	on Operating				Tetra Tech		
Address:	P.O. Box 2249			·		4000 N. Big	Spring	
					<del></del>	Suite 401	, IIA	<del>"</del>
City:	Wichita Falls, TX 7	6307				Midland, Te	exas	
Phone number.						(432) 682-4		
Fax:				-		(402) 002-2	1000	
Email:	mkincaid@sjoc.n	et				ike tavare	z@tetratech	com
						ine.lavale	Les loualeur	.com

Depth to Groundwater:	Ranking Score	Site Data
<50 ft	20	
50-99 ft	10	
>100 ft.	0	
Well Lead Ducks Alex		
WellHead Protection:	Ranking Score	Site Data
Water Source <1,000 ft., Private <200 ft.	20	
Water Source >1,000 ft., Private >200 ft.	0	0
Surface Body of Water:	Ranking Score	Site Data
<200 ft.	20	0.00 20.00
200 ft - 1,000 ft.	10	
>1,000 ft.	0	0
Total Banking Consultation		
Total Ranking Score:	0	
<u></u>		
Acce	eptable Soil RRAL (r	ng/kg)
Benzen		TPH
10	50	5,000



May 5, 2014

Mr. Mike Bratcher Environmental Engineer Specialist Oil Conservation Division, District 2 811S. First Street Artesia, New Mexico 88210

Re: Work Plan for the Stephens & Johnson Operating Co., Mobil 22 Federal #6, Unit K, Section 22, Township 26 South, Range 29 East, Eddy County, New Mexico.

Mr. Bratcher:

Tetra Tech, Inc. (Tetra Tech) was contacted by Stephens & Johnson Operating Co to assess an illegal dump located in Unit K, Section 22, Township 26 South, Range 29 East, Eddy County, New Mexico (Site). The spill site coordinates are N 32.02664°, W 103.97332°. The site location is shown on Figures 1 and 2.

#### Background

According to the State of New Mexico C-141 Initial Report, the illegal dump was discovered on February 18, 2014, and the amount released is unknown. The illegal dumping occurred on the south end of the pad affecting an area approximately 30' X 55'. The initial C-141 form is enclosed in Appendix A.

#### Groundwater

No water wells were listed within Section 27. According to the NMOCD groundwater map, the average depth to groundwater in this area is greater than 125' below surface. The groundwater data is shown in Appendix B.

### Regulatory

A risk-based evaluation was performed for the Site in accordance with the New Mexico Oil Conservation Division (NMOCD) Guidelines for Remediation of Leaks, Spills and Releases, dated August 13, 1993. The guidelines require a risk-based evaluation of the site to determine recommended remedial action levels



(RRAL) for benzene, toluene, ethylbenzene and xylene (collectively referred to as BTEX) and total petroleum hydrocarbons (TPH) in soil. The proposed RRAL for benzene was determined to be 10 parts per million (ppm) or milligrams per kilogram (mg/kg) and 50 ppm for total BTEX (sum of benzene, toluene, ethylbenzene, and xylene). Based upon the depth to groundwater, the proposed RRAL for TPH is 5,000 mg/kg.

### Soil Assessment and Analytical Results

On March 20, 2014, Tetra Tech personnel inspected and sampled the spill area. The impacted area measured approximately 30' x 55'. Two (2) auger holes (AH-1 and AH-2) were installed using a stainless steel hand auger to assess the impacted soils. Selected samples were analyzed for TPH analysis by EPA method 8015 modified, BTEX by EPA Method 8021B and chloride by EPA method 300.0. Copies of laboratory analysis and chain-of-custody documentation are included in Appendix C. The sampling results are summarized in Table 1. The spill area and auger hole locations are shown on Figure 3.

Referring to Table 1, none of the samples exceeded the RRAL's for TPH or BTEX. Elevated chloride concentrations were detected in the areas of AH-1 and AH-2 at 0-1', with bottom auger hole concentrations of 1,040 mg/kg and 15,500 mg/kg, respectively. Deeper samples were not collected due to the dense formation and the chloride impact was not vertically defined.

#### Work Plan

Stephens & Johnson proposes to remove impacted material as highlighted (green) in Table 1 and shown on Figure 4. Prior to excavating the impacted area, backhoe trenches will be installed to attempt to define the chloride extents. Based on the trench data, the impacted area will be excavated to the appropriate depths.

If deeper impact is encountered or the impact is not vertically defined, the areas will be excavated to a depth of approximately 4.0' below surface and capped with either clay material or a 40 mil liner to complete the remediation. Once performed, the area will be backfilled with clean soil to grade. If necessary, Tetra Tech will installed boreholes to define extents for to properly closure of the site.

The proposed excavation depths may not be reached due to wall cave ins and safety concerns for onsite personnel. In addition, impacted soil around oil and gas equipment, structures or lines may not be feasible or practicable to be removed due to safely concerns. As such, Tetra Tech will excavate the soils to the maximum extent practicable.



Upon completion, a final report will be submitted to the NMOCD. If you have any questions or comments concerning the assessment or the proposed remediation activities for this site, please call me at (432) 682-4559.

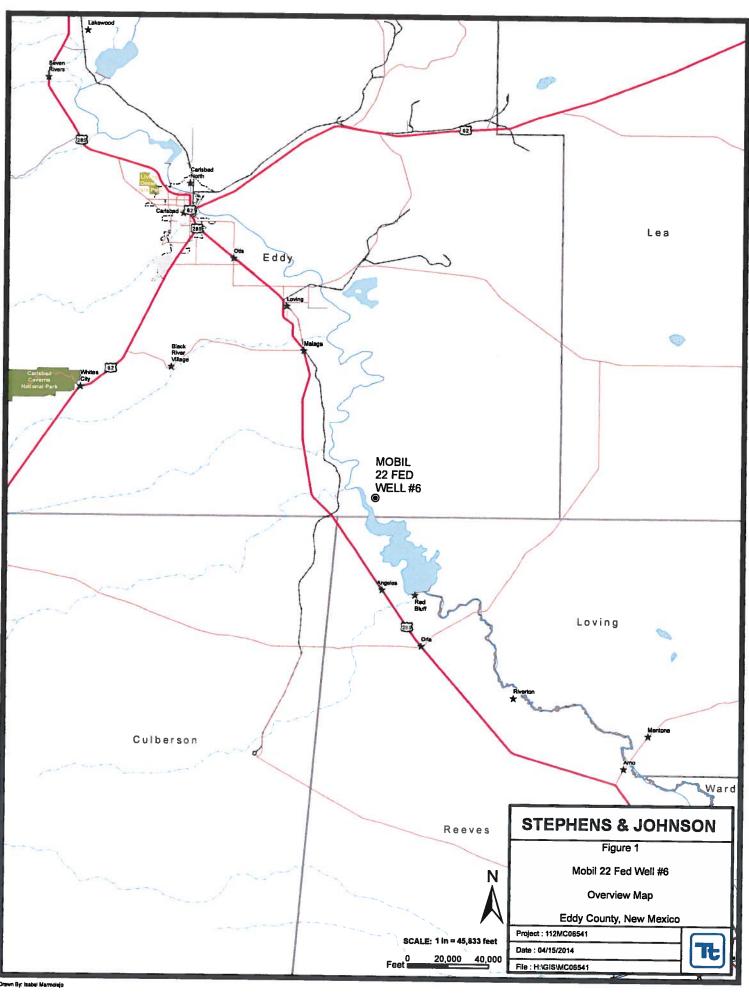
Respectfully submitted, TETRATECH

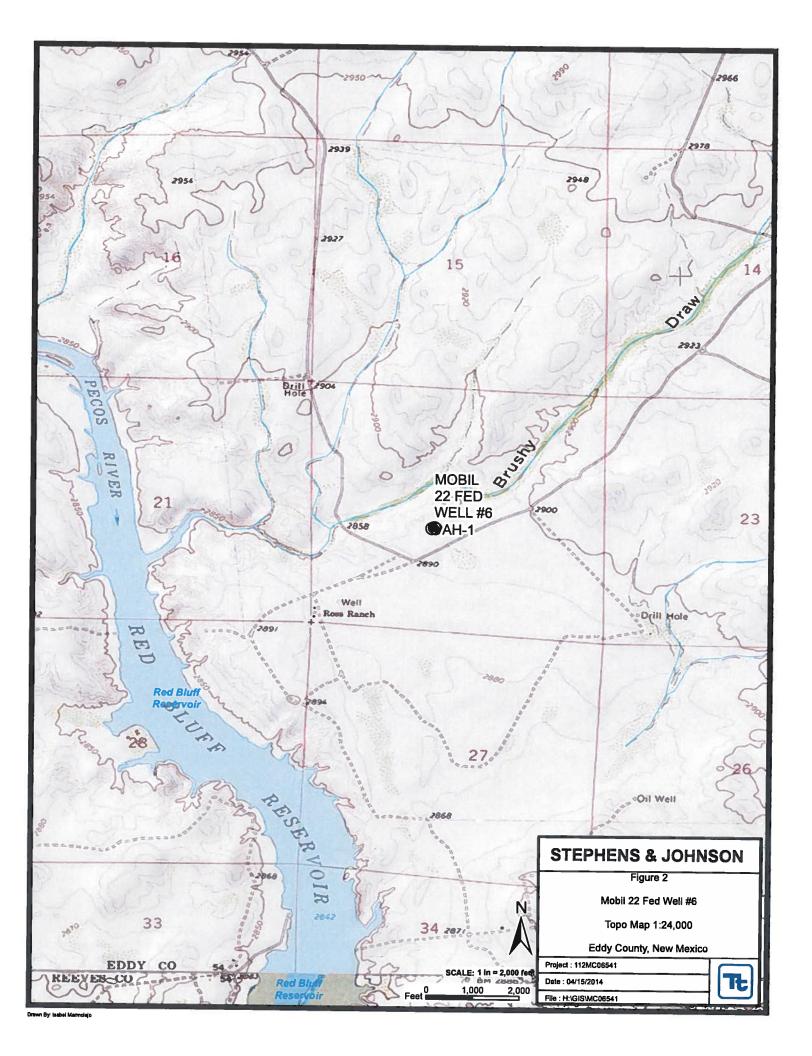
Ike Tavarez

Project Manager

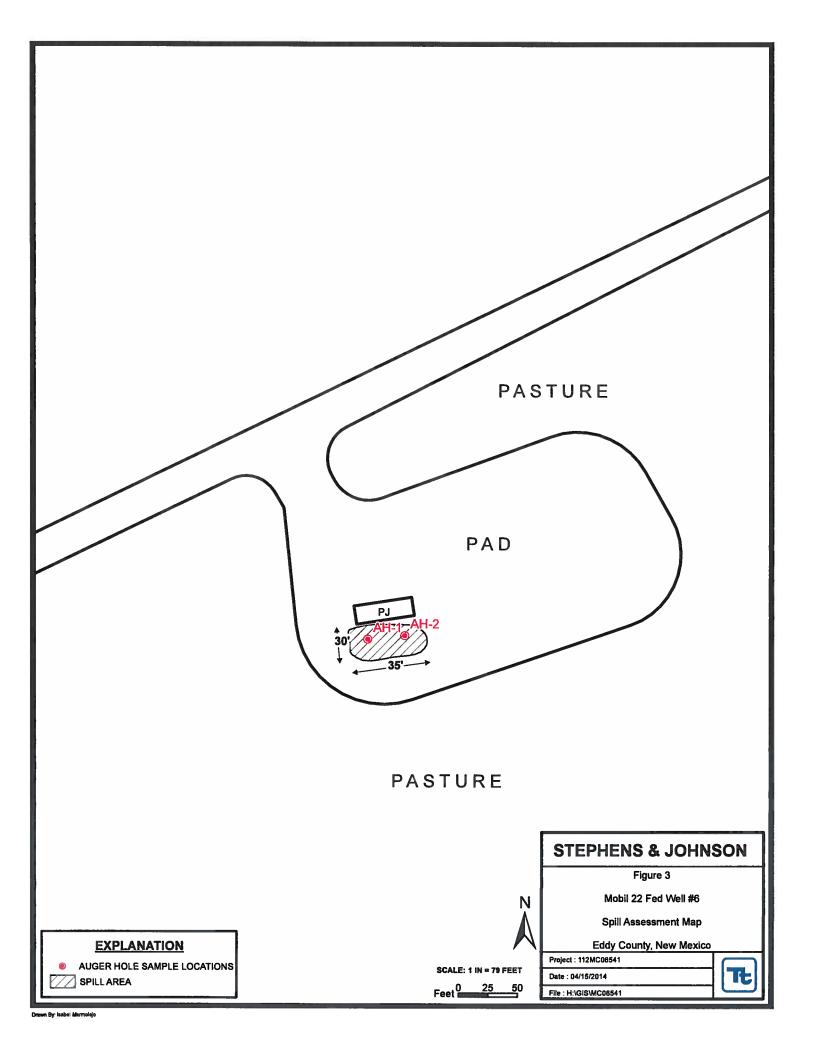
cc: William M. Kincaid - S&J cc: Jennifer Van Curran - BLM

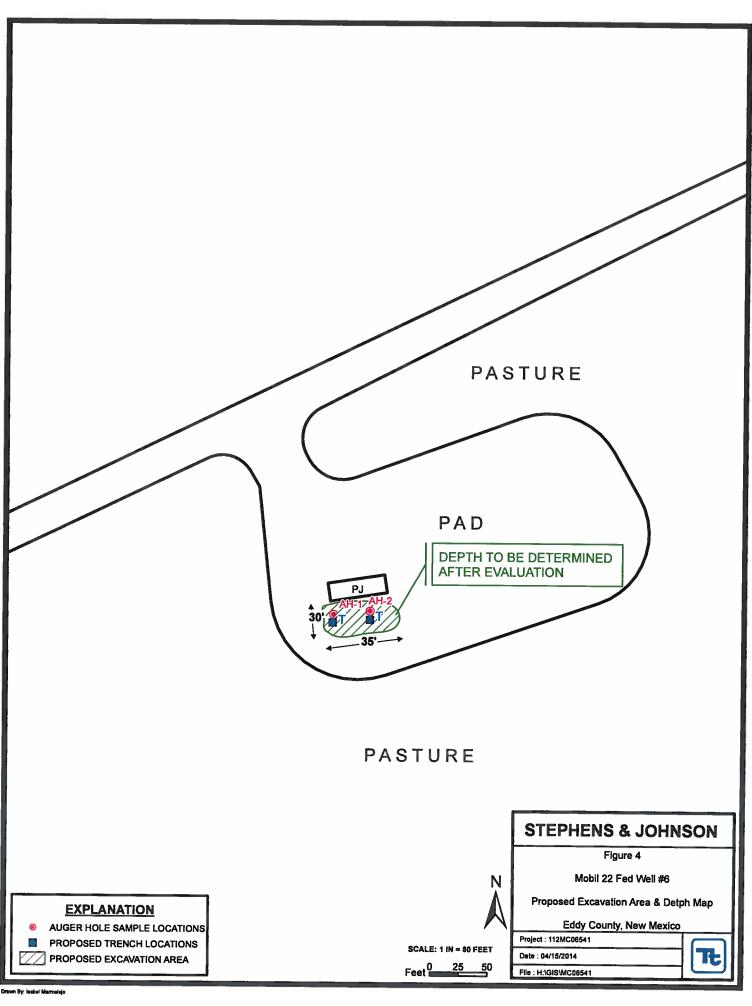
## Figures











## **Tables**

Table 1 Stephens & Johnson Operating Co. Mobil 22 Federal #6

Eddy County, New Mexico

Sample ID	Sample	Sample	Excavation	Soil	Soil Status		TPH (mg/kg)	(6	Benzene	Toluene	Ethlyhenzene	4	Total	Chlorido
	Date		_	In-Situ Remov	Removed	GRO	DRO	Total	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	BTEX (mg/kg)	(mg/kg)
AH-1	3/20/2014	0-1	0	×		113.0	962	606	<0.0400 <0.0400	<0.0400	<0.0400	<0.0400 <0.0400	<0.0400	2 570
T	=	1-1.5	0	×						-				0.00
														0,040
AH-2	3/20/2014	0-1	0	×		<4.00	<50.0	<50.0	<50.0 <0.0200 <0.0200	<0.0200	<0.0200	<0.0200	<0.0200 <0.0200 12.600	12.600
F		1-1.5	0	×				-						15.500

(-) Not Analyzed

(BEB) Below Excavation Bottom
Proposed Excavation Depths

Proposed Trench

## **Photos**

### Stephens & Johnson Operating Co. Mobil 22 Federal #6 Eddy County, New Mexico





View West - Area of AH-1



View East – Area of AH-2

### Stephens & Johnson Mobil 22 Federal #6 Eddy County, New Mexico





View West – Area of AH-1 and AH-2

## Appendix A

District 1
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. Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

Form C-141 Revised October 10, 2003

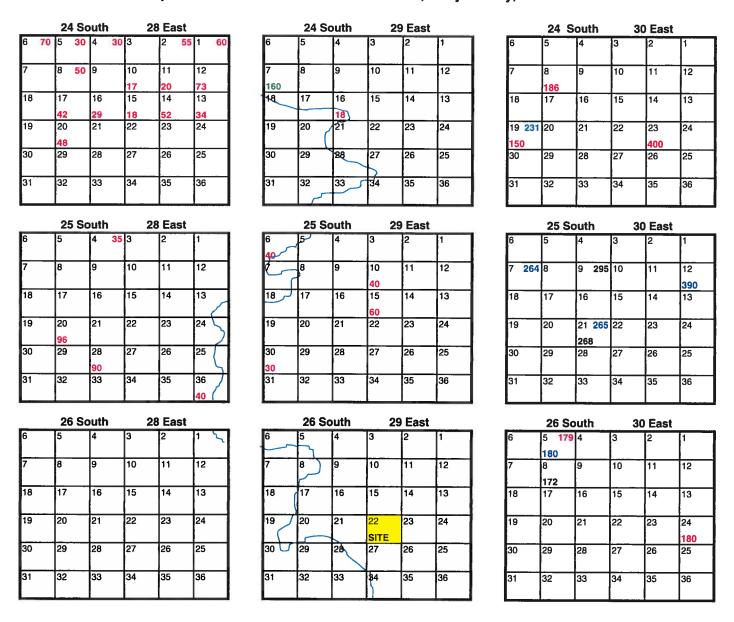
Santa Fe, NM 87505

			Rele	ease Notific	ation	and Co	rrective A	ction				
						OPERA'	ror	Į	Initia	al Report		Final Repor
Name of Co	mpany S	tephens & .	Johnson	Operating Co.	(	Contact Wi	lliam M. Kinca	aid		•		
		49, Wichita		X 76307			No. (940) 723-2	166				
Facility Nar	ne Mobil	22 Federal	#6			Facility Typ	e Well					
Surface Ow	ner: Fede	ral		Mineral O	wner: l	Federal			Lease N	lo. 30-015	-25333	
				LOCA	OITA	OF RE	LEASE					
Unit Letter K	Section 22	Township 26S	Range 29E	Feet from the 2260		/South Line South	Feet from the 2310	1	est Line est	County	Eddy	,
			1	Latitude N 32.6		Longitud		8°				
Type of Rele	ase: Produc	ed water		INAI	UKE		Release Unknow	vn	Volume F	Recovered 1	Vone	
		gal dumping t	rom water	r truck			lour of Occurrence			Hour of Dis		
					1	Unknown			02-18-20			,
Was Immedia	ate Notice (		Yes [	No 🛛 Not Re	equired	If YES, To N/A	Whom?					
By Whom?	By Whom?					Date and I-						
Was a Watercourse Reached? ☐ Yes ☒ No							lume Impacting t	he Water	course.			
		L	Yes 🔼	1 1/10		N/A						
Possibly an i	llegal dump	em and Reme by a water tra	ansporter.	All of the fluids	remaine	d on the well	pad.		· · · · · · · · · · · · · · · · · · ·		, , , <del>, , , , , , , , , , , , , , , , </del>	
The produced	d water spill	<u>-</u>	sed to defi	ine extents. Tetra	Tech w	ill collect soi	samples for the s	site evalu	ation. On	ce defined,	a work j	plan will be
regulations a public health should their c or the environ	Il operators or the environerations homent. In a	are required to ronment. The ave failed to a	o report ar acceptant adequately OCD accep	e is true and compind/or file certain ruce of a C-141 reportinger and ruce of a C-141 reportance of a C-141 re	elease no ort by the emediate	otifications as NMOCD m contaminati	nd perform correct arked as "Final R on that pose a thr	tive action eport" do eat to gro	ons for rele es not reli und water	eases which eve the ope , surface w	may en rator of ater, hu	danger liability nan health
Signature:	Will	·W. k	/wice	aid .			OIL CON	SERV <i>A</i>	ATION	DIVISIO	<u>NC</u>	-
Printed Name	e: William I	M. Kincaid		7		Approved by	District Supervis	or:				
Title: Petrole	um Enginee	er				Approval Dat	e:	E	xpiration	Date:		
E-mail Addre	ess: mkinca	id@sjoc.net			(	Conditions of	Approval:			Attached		
Date: 02-28-2	2014	P	none: 940-	723-2166								

<sup>\*</sup> Attach Additional Sheets If Necessary

## Appendix B

# Water Well Data Average Depth to Groundwater (ft) Stephens & Johnson - Mobile 22 Federal #6, Eddy County, New Mexico



- 88 New Mexico State Engineers Well Reports
- 105 USGS Well Reports
- 90 Geology and Groundwater Conditions in Southern Lea, County, NM (Report 6) Geology and Groundwater Resources of Eddy County, NM (Report 3)
- 34 NMOCD Groundwater Data

# Appendix C

## **Summary Report**

Ike Tavarez Tetra Tech 1901 N. Big Spring St. Midland, TX 79705

Report Date: April 8, 2014

Work Order: 14032031

Project Location: Eddy Co, NM

Project Name: Stephens & Johnson Oper/Mobil 22 Federal #6

Project Number: 112MC06541

Sample	Description	Matrix	Date Taken	Time Taken	Date Received
358498	AH-1 0-1'	soil	2014-03-20	00:00	2014-03-20
358499	AH-1 1-1.5'	soil	2014-03-20	00:00	2014-03-20
358500	AH-2 0-1'	soil	2014-03-20	00:00	2014-03-20
358501	AH-2 1-1.5'	soil	2014-03-20	00:00	2014-03-20

		E	TEX		TPH DRO - NEW	TPH GRO
1	Benzene	Toluene	Ethylbenzene	Xylene	DRO	GRO
Sample - Field Code	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)
358498 - AH-1 0-1'	< 0.0400 1	< 0.0400	< 0.0400	< 0.0400	796 Qs	113
358500 - AH-2 0-1'	< 0.0200	< 0.0200	< 0.0200	< 0.0200	<50.0 Qs	<4.00

Sample: 358498 - AH-1 0-1'

Param	Flag	Result	Units	RL
Chloride		2570	mg/Kg	5

Sample: 358499 - AH-1 1-1.5'

Param	Flag	Result	Units	RL
Chloride		1040	mg/Kg	5

Sample: 358500 - AH-2 0-1'

<sup>&</sup>lt;sup>1</sup>Dilution due to hydorcarbons.

Report Date: April 8, 2014 Work Order: 14032031 Page Number: 2 of 2 Param Flag Result Units RLChloride 12600 mg/Kg 5 Sample: 358501 - AH-2 1-1.5' Units RLParam Flag Result 15500 Chloride mg/Kg