



**Red Bluff Draw**  
**(T25S, R28E, Sec 34 & 35)**  
**Remediation Proposal**

Release Date: September 26, 2014

**September 16, 2015**

Prepared by:

Zack Thomas  
Environmental Representative  
Mewbourne Oil Company  
701 S. Cecil  
Hobbs, NM 88240

Mike Bratcher  
Oil Conservation Division, EMNRD  
E-Mail: mike.bratcher@state.nm.us

## Site Assessment

The area addressed in this proposal is from Highway 285 Bridge to 0.5 miles east of bridge (Red Bluff Draw). Based on a site ranking of 20, **NMOCD Recommended Remediation Action Levels** for DRO is 100 mg/kg. According to the site characterization report by GL Environmental, reported DRO concentrations from two sediment samples east of bridge ranged from 53 mg/kg to 78 mg/kg making them below the RRAL of 100 kg/mg. All other sampling by GL detected no traces of DRO in any sediments, soils, or surface water samples. Mewbourne also had previous soil and surface water samples taken by Talon LPE from which no DRO was detected. Sample data from Talon LPE can be referenced at the end of this report or in full from the SMA Proposed Scope of Work for Assessment of the Use of Prescribed Fire as Mitigation of Hydrocarbon Affected Vegetation dated January 26, 2015.

## Conclusion

Mewbourne Oil Company respectfully opposes the proposal of further sampling, fencing, and excavation of materials East of Highway 285 Bridge (Map 3 & 4 of GL Environmental Site Remediation Plan) because all samples (Soil, Water, and Sediment) from both GL Environmental and Talon LPE, were under the **NMOCD RRALs**. Since all samples taken were below NMOCD RRALs and the very sparse quantity of contaminated vegetation, Mewbourne Oil Company believes that evasive site work would be detrimental to the area. Pictures of this area taken 09/08/15 indicate there is not a re-vegetation issue present.

Based upon all analytical data taken, Mewbourne Oil Company proposes the following for hydrocarbon removal/treatment: Micro-Blaze impacted vegetation with a hand spray rig from Highway 285 Bridge to 0.5 miles east of bridge in the Red Bluff Draw. Mewbourne will maintain communication with grazing lessee and will hand remove or micro-blaze any additional contaminated vegetation as needed.

Sincerely,

A handwritten signature in dark ink, appearing to read "Z. Thomas", with a stylized, cursive script.

Zack Thomas  
Environmental Representative  
Mewbourne Oil Company

**Incident Summary: MOC (2RP-2532)**

Volume of Release: 253 bbls, Volume of Recovery: 253 bbls

The excerpt below is from the Remediation and Sampling report, Talon LPE (Appendix A-5)

*"Incident Description*

*"On September 26, 2014, the SWD line running along the west side of Highway 285 from the San Lorenzo SWD to the Delaware Ranch SWD was damaged in the draw between mile marker 6 and 7 by debris and rising flood waters causing a release of 1726 barrels mixed fluids. Upon discovery, approximately 253 barrels of oil and 267 barrels of water were immediately recovered utilizing vac trucks. The area affected was approximately 6,000-feet in length from the bridge south down the draw." The Initial C-141 is presented in Appendix A .*

*"The ranking for this site is 20 based on the following:"*

Depth to ground water	<50'
Wellhead Protection Area	>1000'
Distance to surface water body	<1000'

TABLE 2 SUMMARY OF ANALYTICAL RESULTS - SOIL ASSESSMENT

Analytical Report- H403437, H403673	Sample Date	Depth	BTEX mg/Kg	GRO mg/Kg	DRO mg/Kg
W-1	11-12-14	N/A	<0.006	<1.00	<1.00
W-2	11-12-14	N/A	<0.006	<1.00	<1.00
W-3	11-12-14	N/A	<0.006	<1.00	<1.00
S-1	11-12-14	0, 0.5	<0.300	<10	<10
S-2	11-12-14	0, 0.5	<0.300	<10	<10
S-3	11-12-14	0, 0.5	<0.300	<10	<10
BG-1	11-12-14	0	<0.300	<10	<10
BG-2	11-12-14	0	<0.300	<10	<10
BG-3	11-12-14	0	<0.300	<10	<10

All sample locations are shown in Figure 2

















