

# R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

February 25, 2014

Mike Bratcher  
NMOCD District 2  
811 South First Street  
Artesia, New Mexico 88210

RE: Clayton Williams Energy, Inc. – Jenna Com Release

Mike:

In response to the previously-submitted remediation plan, you wrote

... OCD requests vertical and horizontal delineation in all areas affected by the release, including inside the tank battery and areas where impacted material has been spread. OCD will review a remediation proposal based on the actual delineation analytical data and site ranking criteria.

This submission proposes collecting samples from two trenches to complement the existing data. Each square on the graphic below is the area of a 5-point composite sample. The result of this composite sampling effort was previously submitted to OCD. In the graphic below the

- green represents an analytical result of chloride less than 600 mg/kg
- yellow represents results between 600 and 3,000 mg/kg
- orange represents results between 3000 and 5000 mg/kg
- red represents results between 5000 and 6000 mg/kg and
- the two checked rectangles are the locations of the proposed sampling trenches



Our previous submission used historic Google Earth images to document that the sampling grids that captured the horizontal extent of the footprints created by the spills.

The southern trench will be about 15-20 feet long and 12 feet deep. The southern trench will be sampled on the eastern edge at 2-foot increments to characterize the vertical distribution of chloride beneath the tank battery area and on the western edge at 2 and 4 feet below grade. The northern trench will be less than 10 feet long and sampled in the same manner in the center of the trench.

Field conditions relating to buried pipelines and other equipment may necessitate a re-orientation of the trenches. For example, the southern trench may be oriented north-south and the northern trench may move south and west in order to maintain the general location of the samples to augment the existing characterization.

As an addition to the remedy proposed in the previous submittal, Clayton-Williams Energy, Inc. will implement the following actions:

1. Re-grade the area of the southern trench to form an extension of the tank battery secondary containment firewall

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2. While the top of the extended firewall is the same elevation as the existing, the elevation of the bottom of this new portion of the secondary containment is about 4-feet below the elevation of the bottom of the containment area adjacent to the tanks.
3. This extension of the secondary containment will be sized to hold 400 barrels of fluid at capacity
4. The 400 barrel extension and portions of the existing secondary containment and will be lined with 20-mil LLDPE (new or reclaimed, high-quality liner)

The obvious purpose of the expansion and lining of portions of the secondary containment area is to provide the capability to capture and fully contain a spill of up to 400 barrels.

All evidence clearly shows that the remedy proposed in the previous submission meets the mandates of OCD Rules in the area outside of the battery's fire wall. Thus, the data collected by the two sampling trenches will not change remedy in this area. Data collected by the sampling trench within the secondary containment (the southern trench) will help guide the final site restoration when the battery is removed at abandonment. The proposed improvement to the secondary containment of this active battery is the only remedy proposed for this area at this time.

Upon OCD approval of this sampling plan and the expansion and lining of portions of the battery secondary containment, we will implement the program. We will provide OCD with at least 72 hours of notice prior to commencing activities. Please give us a call if you wish to discuss this plan or the AMIGO simulations.

Sincerely,  
R.T. Hicks Consultants, Ltd.



Randall T. Hicks  
Principal

Copy: State Land Office, Terry Warnell  
BLM, Jim Amos