



C&S CONSULTING
1873 FM 1252 E • P.O. Box 1049
KILGORE, TX 75662

November 17, 2017

RELEASE CHARACTERIZATION WORK PLAN

Rockcliff Operating New Mexico, LLC (Rockcliff) SCB Injection Facility

API No.: ~~30-015-26472~~ 30-15-22404

Remediation Case # ~~2RP-4255~~ 2RP-4412

Eddy County, New Mexico

C&S Consulting (C&S) was retained by Rockcliff to establish a release characterization work plan with the ability to satisfy requests of New Mexico Oil Conservation District (NMOCD) staff and NMOCD Conditions of Approval (COA) as previously established for the release that occurred at the SCB Injection Facility on September 8, 2017. A map of the SCB Injection facility is attached to this letter. C&S will address what we interpret to be an appropriate path forward through the bulleted process below:

- Establish Current Conditions

According to Rockcliff staff, the release was abated relatively quickly and the fluids on the ground were recovered in a timely fashion from the bermed area. Because of this, it is assumed that relatively little vertical migration of contaminants occurred. C&S proposes the following:

- Complete nine (9) soil borings in and around the SCB Injection Facility release area as documented on the attached site map.

C&S proposes that proposed points, provided on Attachment 1 (Proposed Soil Boring Locations), which include nine (9) sample points around and within the assumed impacted area, be approved for the first phase of the investigation. Each sample point will be advanced via hand auger to three (3) feet below ground surface (bgs). These locations are dependent upon NMOCD approval prior to beginning work. C&S will also take care to follow NMOCD guidance as detailed in the COA and regulatory correspondence with any investigations and reporting.

- Sample Screening and Analytical Methodology

Each core will be visually and mechanically screened. Each core will also have field notes describing the physical properties of each soil core. Sample locations will include grab samples gathered at the surface, 1', 2', 3' & 5' bgs, and analyzed. Sample methodology is subject to change in the field per field screening, which will determine the borehole terminus and bottom sample. Analyses for each core will follow COA guidance at a minimum. Analyses will include chlorides (Method 300), benzene, toluene, ethylbenzene, and total xylenes (by either Method 8260 or 8021), and total petroleum hydrocarbons (by Method 8015 extended range including GRO+DRO+MRO; C₆ thru C₃₆). C&S will review the data, once received and compare it to the standard target concentrations as



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established by NMOCD. Further investigation and/or remediation as determined through this investigation will be determined by those analyses. The standard target concentration for the listed constituents above for onsite soils will be:

- Benzene – 10 ppm (mg/kg)
- BTEX – 50 ppm (mg/kg)
- TPH – 100 ppm (mg/kg)
- Chlorides – 600 ppm (mg/kg)

- NMOCD Preapproval

With our general workplan, as stated above, to begin as soon as possible, C&S would like to have concurrence of the regulatory staff prior to mobilization to preclude any potential confusion and/or project oversights.

- Media Disposal

All soil cuttings will be returned to the borings after sampling.

If you have any questions or require additional information, please contact me at 903-988-8642 or DHenderson@cslease.com.

Sincerely,

A handwritten signature in black ink, appearing to read "D Henderson", with a long horizontal line extending to the right.

Dustin Henderson, P. G.
C&S Consulting

Enclosures

Attachments

SCB Injection Facility

Release Investigation Plan

Legend

- SCB Soil Boring Proposed Locations
- SCB Injection Facility Release Area

