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April 4, 2021

Robert J Hamlet State of New Mexico Energy, Minerals, and Natural Resources Oil Conservation Division 811 S. First St., Artesia NM 88210 NMOCD District District 1 - HOBBS 1625 N. French Drive Hobbs, New Mexico 88240 Electronic Submittal via Portal

RE: Revised Sampling Workplan Incident ID: nRM2003454039 Location: Wool Head 20 State Com 703H AEP #: 08282019-1430-unknown

Dear Mr. Hamlet,

Thank you for your review of Wool Head 20 St Com #703 (#NRM2003454039).

In response to the closure denial, we present this revised confirmation soil sampling plan for additional laboratory analysis of closure criteria constituents listed in Table 1 of 19.15.29 NMAC.

The October 2019 remedial activities removed approximately 900 cubic yards of impacted soil, which was delineated vertically and horizontally for chlorides, in order to meet or exceed closure criteria for this constituent. In the setting of a <u>treated</u> produced water release, most, if not all hydrocarbons would also be removed in the excavation of chloride impacted soil. The base and wall samples tested for hydrocarbon constituents were near the two (2) release sources where hydrocarbon impact is likely to be greatest.

Limited confirmation samples collected to date demonstrate that hydrocarbons are below laboratory detection levels. Chloride is below Closure Criteria as listed in Table 1 of 19.15.29 NMAC, where depth to water is greater than 100 feet. Depth to water is calculated at 318-feet below ground surface; where, 318 feet = 3778 ft surface elevation – 3460 ft potentiometric surface. Summary of analytical (Table 2), depth to water (Plate 2) and potentiometric surface (Plate 3) maps reproduced from the November 25, 2019 submittal are attached.

Plate R1-1 shows the sampling diagram for base samples performed to date. A 5-point composite base sample was collected from each grid for confirmation sampling. Five-point composite sample points were evenly spaced within each sample grid to obtain a representative sample of the area (Figure 1, below example).

Incident ID: nRM2003454039 AEP #: 08282019-1430-unknown



Figure 1: Example of 5-point sample grid for composite sampling.

Five-point composite wall samples were collected along the walls of the excavation as shown on Plate 1R-1. Sample points for the composite wall samples were evenly distributed along the wall to obtain a representative 5-point composite sample. Samples were collected from the surface to 4-feet or excavation base depth, whichever was less.

To comply with 19.15.29.12.D.(1).(b) NMAC, we respectfully submit this revised sampling plan for NMOCD approval. Soil samples will be analyzed for all constituents listed in Table 1 of 19.15.29 NMAC. As the impacted soil has been excavated and replaced with clean soil, we propose testing native soil along the periphery of the release extent (wall samples) from 0-2 feet and base samples immediately below previous excavation depth. Plate R1-2 shows the location of proposed borings along with excavation depth (for base samples). As presented on Plate R1-3, each base sample represents an area between 126 and 420 square feet, with an average square footage of 300.



Incident ID: nRM2003454039 AEP #: 08282019-1430-unknown

Each soil sample will vertically delineate to the following closure criteria for areas off-site and no longer in use; where depth to water is greater than 100-ft, as defined in Table 1 of 19.15.29 NMAC.

- Upper 4-feet
 - Chloride < 600 mg/kg
 - \circ TPH (GRO + DRO + MRO) < 100 mg/kg
 - o BTEX < 50 mg/kg
 - o Benzene < 10 mg/kg
- Below 4-feet
 - o Chloride < 20,000 mg/kg
 - TPH (GRO + DRO + MRO) < 2,500 mg/kg
 - $\circ \quad TPH (GRO + DRO) < 1,000 \text{ mg/kg}$
 - \circ BTEX < 50 mg/kg
 - o Benzene < 10 mg/kg

It is anticipated that confirmation sampling will meet closure criteria for off-site use for areas no longer in-use. Therefore, no additional remediation is expected; and volume of excavated material is zero. After confirmation sampling, the surface will be restored and reclaimed to conditions prior to the release.

If confirmation sample results exhibit concentrations exceeding the above closure criteria, we will submit a revised remediation, restoration, and reclamation workplan.

Confirmation sampling will begin within 30-days of workplan approval. If confirmation samples meet the closure standards referenced in Table 1 of 19.15.29 NMAC, we will submit a closure report within 45-days of laboratory results.

I look forward to your response. We are eager to facilitate closure of this site and are committed to working with NMOCD towards this goal.

Sincerely,

Andrew Parker Environmental Scientist



Sample ID	Date	Discrete Depth	Top Depth	Bottom Depth	EC (Hanna)	Chloride	GRO+DRO	TPH Ext.	Benzene	BTEX	Comments
NMOCD Limits		(Feet)	(Feet)	(Feet)	dS/m	(PPM)	(PPM)	(PPM)	(PPM)	(PPIN)	
						600		2.500	10	50	
0 - 4 feet & "not in-use"		-		-		600		2,500	10	50	
> 4 ft or "in-use"						20,000	1,000	2,500	10	50	
HA-01	9/3/2019	5.5			0.06	48					Hand Auger; Grid S-05
HA-02	9/3/2019	3.5			0.07	NS					Hand Auger; Between Grid S-07 & S-08 Not Sampled
HA-03	9/3/2019	4.0			0.02	NS					Hand Auger; Between Grid S-08 and S-12 Not Sampled
HA-04	9/3/2019	5.5			0.06	160					Hand Auger; Grid S-03
S-01 Base	9/5/2019	5.5			0.01	48					
S-01 N. Wall	9/5/2019		0.0	4.0	0.01	48					
S-01 S. Wall	9/5/2019		0.0	4.0	0.03	48					
S-01 W. Wall	9/3/2019		0.0	4.0	0.05	48	<20	<30	<0.050	<0.3	
S-01 Trench Base	9/3/2019	8.0			0.04	32					
S-01 Trench Wall	9/3/2019	6.0			0.04	32					
S-02 Base	9/5/2019	5.0			0.01	32					
S-02 N. Wall	9/5/2019		0.0	4.0	0.11	160	<20	<30	<0.05	<0.3	
S-02 S. Wall	9/5/2019		0.0	4.0	0.02	48					
S-03 Base	9/5/2019	5.5			0.01	48					
S-03 N. Wall	9/5/2019		0.0	4.0	0.01	48					
S-03 S. Wall	9/5/2019		0.0	4.0	0.01	48					
S-04 Base	9/9/2019	3.0			0.02	64					
S-04 N. Wall	9/9/2019		0.0	3.0	0.02	16					
S-04 S. Wall	9/9/2019		0.0	3.0	0.04	32					
S-04 E. Wall	9/9/2019		0.0	3.0	0.05	32	<20	<30	<0.05	<0.3	
S-05 Base	9/9/2019		4.0	5.0	0.15	128	<20	<30	<0.05	<0.3	
S-05 N. Wall	9/9/2019		0.0	4.0	0.02	32					
S-05 S. Wall	9/9/2019		0.0	4.0	0.04	48					
S-06 Base	9/5/2019	4.5			0.34	448	<20	<30	<0.05	<0.3	
S-06 N. Wall	9/9/2019		0.0	4.0	0.02	16					
S-06 S. Wall	9/5/2019		0.0	4.0	0.12	80					
S-07 Base	9/5/2019	4.5			0.05	80					
S-07 N. Wall	9/5/2019		0.0	4.0	0.04	64					
S-07 S. Wall	9/5/2019		0.0	4.0	0.04	32					
S-08 Base	9/9/2019	5.0			0.8	704					
S-08 N. Wall	9/9/2019		0.0	4.0	0.02	32					
S-08 S. Wall	9/9/2019		0.0	4.0	0.02	16					
S-09 Base	9/5/2019	2.5			0.01	32					
S-09 E. Wall	9/5/2019		0.0	2.0	0.1	144					
S-09 N. Wall	9/5/2019		0.0	2.5	0.04	48					
S-09 S. Wall	9/5/2019		0.0	2.5	0.01	32					
S-10 Base	9/9/2019	4.5			0.05	48					
S-10 E. Wall	9/9/2019		0.0	4.0	0.01	16					
S-10 N. Wall	9/9/2019		0.0	4.0	0.01	32					
S-10 S. Wall	9/9/2019		0.0	4.0	0.03	<16					
S-11 Base	9/5/2019	1.0			0.01	48					
S-12 Base	9/9/2019	5.0			0.06	64				Γ	
S-12 N. Wall	9/9/2019		0.0	4.0	0.07	16					
S-12 S. Wall	9/9/2019		0.0	4.0	0.06	48					

R.T. Hicks Consultants, Ltd

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Oil Conservation Division

Remediation Plan Checklist: Each of the following items must be included in the plan.

	Page 10 of 1	11
Incident ID	nRM2003454039	
District RP		
Facility ID		
Application ID		

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Remediation Plan

Detailed description of proposed remediation technique Scaled sitemap with GPS coordinates showing delineation points Estimated volume of material to be remediated Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required) Deferral Requests Only: Each of the following items must be confirmed as part of any request for deferral of remediation. Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction. Extents of contamination must be fully delineated. Contamination does not cause an imminent risk to human health, the environment, or groundwater. I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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. Title: <u>Env. Scientist</u> Printed Name: <u>Andrew Parker</u> Signature: Date: April 4, 2021 Telephone: <u>970-570-9535</u> email: _aparker@advanceenergypartners.com **OCD Only** Date: 7/15/2021 Robert Hamlet Received by: Approved X Approved with Attached Conditions of Approval Denied Deferral Approved Robert Hamlet Date: 7/15/2021 Signature:

Page 5

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

CONDITIONS

Operator:	OGRID:
ADVANCE ENERGY PARTNERS HAT MESA, LLC	372417
11490 Westheimer Rd., Ste 950	Action Number:
Houston, TX 77077	23578
	Action Type:
	[C-141] Release Corrective Action (C-141)

CONDITIONS

Created	Condition	Condition
Ву		Date
rhamlet	t The Revised Sampling Plan is approved with the following conditions: When nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from	7/15/2021
	the site, and data should be no more than 25 years old, and well construction information should be provided. If evidence of depth to ground water within a ½ mile radius of the site cannot be	
	provided, impacted soils will need to meet Table 1 Closure Criteria for ground water at a depth of 50 feet or less. Please make sure all groundwater data is included in closure report summary.	
	Soil samples will need to meet Table 1 Closure Criteria for proven depth to water determination.	

CONDITIONS

Page 11 of 11

Action 23578