

Bratcher, Mike, EMNRD

From: Dan Gibson <dgibson@kcharvey.com>
Sent: Thursday, November 30, 2017 10:27 AM
To: Bratcher, Mike, EMNRD
Cc: Chase Settle (chase_settle@eogresources.com)
Subject: Gulf KC State #1 - 2RP-168
Attachments: Gulf KC State Com #1.pdf

Mike –

Chase Settle has requested KC Harvey Environmental, LLC (KCH) assist EOG is closing the subject release incident. I've attached what information I could find from the OCD on-line files. The C-141 indicates that area was excavated and that soil samples were collected. I have not been able to find anything that indicates the sample results were submitted to OCD. If this is the case, I would like to call you to discuss a plan to address the remaining concerns for this site. I'll give you a call this afternoon. If you have a specific time that works better for you, please let me know.

Thanks,

Daniel K. Gibson, P.G.
Regional Manager

KC Harvey Environmental, LLC
7 Sunnygrove Drive
Odessa, Texas 79761 USA

Mobile: 432-312-7717
www.kcharvey.com



District I
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.
Santa Fe, NM 87505

MAY - 2 2008
OCD-ARTESIA

Form C-141
Revised October 10, 2003

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

Release Notification and Corrective Action

3EB0814157019
13EB0814156857
13EB0814156583

OPERATOR

X Initial Report Final Report

Name of Company Yates Petroleum Corporation	Contact Mike Stubblefield
Address 105 South 4 th Street, Artesia, N.M. 88210	Telephone No. 505-7484500 505-513-1712
Facility Name Gulf KC State #1 30-015-22728	Facility Type Tank Battery

Surface Owner <u>Fee STATE</u>	Mineral Owner State	Lease No.
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LOCATION OF RELEASE

Unit Letter C	Section 18	Township 18s	Range 25e	Feet from the 660'	North/South Line FNL	Feet from the 1980'	East/West Line FWL	County Eddy
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Latitude 32.75387 Longitude 104.52654

NATURE OF RELEASE

Type of Release Produced water & condensate.	Volume of Release 19 bbls produced water & 1 bbl condensate	Volume Recovered 0
Source of Release Gun Barrel	Date and Hour of Occurrence 4/28/2008 am.	Date and Hour of Discovery 4/28/2008 3 00pm
Was Immediate Notice Given? Yes No X Not Required	If YES, To Whom	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully *

Describe Cause of Problem and Remedial Action Taken.*

The water leg on gun barrel broke due to high winds The water leg was repaired on the gun barrel.

Describe Area Affected and Cleanup Action Taken.*

The impacted area was located in the battery area around the gun barrel and along the berm on the eastside of the battery. The battery area was partially bermed. The pasture on the eastside of the battery was impacted. This area measured to be 15' x 30'. The impacted soil located within the bermed area of the battery was excavated. Removed soils were placed on a liner set on the location. Soil samples will be taken for analytical from the impacted areas. Soil samples will be sent to a second party lab & analysis ran for TPH & B-TEX and Chlorides. If the initial analytical results find the TPH & B-TEX to be over the RRAL. A work plan will be submitted to OCD for the correction of the hydrocarbons. When Analytical results reflect the TPH & B-tex to be under the RRAL. A final C-141 form will be submitted to the OCD requesting closure for the release that occurred on 4/28/2008. Final analytical results for the Chlorides will be evaluated and appropriate actions taken.

Depth to ground water > 100'. Wellhead protection area > 1000'. Distance to surface water body > 1000' Site ranking 0

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.

OIL CONSERVATION DIVISION

Signature: Mike Stubblefield

Printed Name Mike Stubblefield

Title Environmental Regulatory Agent

E-mail Address. mikes@ypcnm.com

Date: 5/1/2008

Phone 505-748-4500

Approved by District Supervisor: Timmy SB

Approval Date: 6-3-08

Expiration Date: 8-1-08

Conditions of Approval:

STIPULATIONS

Attached ☒

* Attach Additional Sheets If Necessary

3EB0814157330

2RP-168

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor

Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



June 3, 2008

Yates Petroleum Corporation
Attn: Mike Stubblefield
105 S 4th Street
Artesia, NM 88210

Reference: Gulf KC State Com 001 C-18-18S-25E
30 015 22728 Eddy County, New Mexico
2RP-168

Operator,

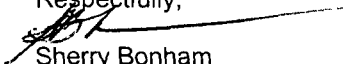
The New Mexico Oil Conservation Division District 2 Office (OCD) is in receipt of an Initial Report C-141 for a release of produced water and condensate occurring at the above referenced facility on April 28, 2008. Included on the C-141 is a plan for remediation actions.

The plan is accepted with the following stipulations:

- Contaminated soils within the bermed area and the reported approximate 450 square feet pasture area shall be remediated so that residual contaminant concentrations are below the recommended soil remediation action levels. Confirmation soil samples reflecting TPH, BTEX, and chloride constituents will be required.
- Notify the OCD 48 hours prior to obtaining samples where analyses are to be submitted to the OCD.
- Remediation requirements may be subject to change as site conditions warrant.
- Results of analytical data obtained through sampling shall be forwarded to OCD for approval **prior** to any backfilling activities.
- A final Report C-141 is to be submitted to the OCD upon satisfactory completion of remediation project.
- Remediation to be completed on or before August 1, 2008.

Please be advised that NMOCD acceptance of this plan does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of this plan does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

Respectfully,


Sherry Bonham
NMOCD District 2
1301 W Grand Avenue
Artesia, NM 88210
575.748.1283 ext. 109
sherry.bonham@state.nm.us



Bratcher, Mike, EMNRD

From: Dan Gibson <dgibson@kcharvey.com>
Sent: Friday, December 8, 2017 4:46 PM
To: Bratcher, Mike, EMNRD
Subject: RE: Gulf KC State #1 - 2RP-168

Mike- Just wanted to check to see if you had found time to upload the file for the subject site onto the OCD website.

Thanks,

Daniel K. Gibson, P.G.
Regional Manager

KC Harvey Environmental, LLC
7 Sunnygrove Drive
Odessa, Texas 79761 USA

Mobile: 432-312-7717
www.kcharvey.com



From: Dan Gibson
Sent: Thursday, November 30, 2017 11:27 AM
To: Mike Bratcher (mike.bratcher@state.nm.us)
Cc: Chase Settle (chase_settle@eogresources.com)
Subject: Gulf KC State #1 - 2RP-168

Mike –

Chase Settle has requested KC Harvey Environmental, LLC (KCH) assist EOG is closing the subject release incident. I've attached what information I could find from the OCD on-line files. The C-141 indicates that area was excavated and that soil samples were collected. I have not been able to find anything that indicates the sample results were submitted to OCD. If this is the case, I would like to call you to discuss a plan to address the remaining concerns for this site. I'll give you a call this afternoon. If you have a specific time that works better for you, please let me know.

Thanks,

Daniel K. Gibson, P.G.
Regional Manager

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7 Sunnygrove Drive
Odessa, Texas 79761 USA

Mobile: 432-312-7717
www.kcharvey.com



Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Tuesday, December 12, 2017 12:03 PM
To: 'Dan Gibson'
Cc: Chase Settle (chase_settle@eogresources.com)
Subject: RE: Gulf KC State #1 - 2RP-168

RE: 2RP-168

Dan,

I apologize for taking too long to get this stuff uploaded, but everything that was in the hard file is now online, here:

<http://ocdimage.emnrd.state.nm.us/imaging/AEOrderFileView.aspx?appNo=pSEB0814157330>

Hope this helps some.

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

From: Dan Gibson [mailto:dgibson@kcharvey.com]
Sent: Thursday, November 30, 2017 10:27 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Chase Settle (chase_settle@eogresources.com) <chase_settle@eogresources.com>
Subject: Gulf KC State #1 - 2RP-168

Mike –

Chase Settle has requested KC Harvey Environmental, LLC (KCH) assist EOG is closing the subject release incident. I've attached what information I could find from the OCD on-line files. The C-141 indicates that area was excavated and that soil samples were collected. I have not been able to find anything that indicates the sample results were submitted to OCD. If this is the case, I would like to call you to discuss a plan to address the remaining concerns for this site. I'll give you a call this afternoon. If you have a specific time that works better for you, please let me know.

Thanks,

Daniel K. Gibson, P.G.
Regional Manager

KC Harvey Environmental, LLC
7 Sunnygrove Drive
Odessa, Texas 79761 USA

Mobile: 432-312-7717
www.kcharvey.com



Bratcher, Mike, EMNRD

From: Dan Gibson <dgibson@kcharvey.com>
Sent: Tuesday, December 19, 2017 11:13 AM
To: Bratcher, Mike, EMNRD
Cc: Chase Settle (chase_settle@eogresources.com)
Subject: Gulf KC State Com#1 2RP-168
Attachments: OCD File Summary.pdf; State file 12 12 2017.pdf

Mike:

Thanks again for getting the file on the OCD website. I've reviewed the file and prepared the attached summary. I've also included a copy of the documents in the OCD file.

The June 23, 2008 Spill Summary and Workplan provides documentation on the remediation and sampling activities in early June 2008. It also provides a workplan for the issues required to close the site. While the file does not indicate these activities were completed, the absence of a soil stockpile and the fact there is no open excavation on site suggest these activities may be complete. The remaining remediation activities were focused on the gun barrel tank area. To evaluate if this area was remediated, we propose to collect soil samples from two shallow soil borings. These samples will be submitted for TPH, BTEX and chloride analysis using approved OCD methods. The results of these samples should provide sufficient analytical data to determine if additional soil remediation is required.

The file also provides sample results from the pasture area. The file indicates TPH and BTEX levels are below RRALs. Chloride concentrations were 1,970 ppm at the surface and 528 ppm at a depth of three feet. The proposed action was to deep rip the area which was reportedly approved by the ranch manager. To evaluate if additional activities are warranted, we propose to inspect the area and compare the vegetation present in this area with the surrounding land. If the vegetative coverage is similar, we propose no further action.

When the sample results are available and the site inspection is complete, the documentation will be provided to OCD along with a proposed scope of any additional activities that may be required. If OCD agrees no further action is required, a final C-141 will be submitted.

Thanks,

Daniel K. Gibson, P.G.
Permian Basin Regional Manager

KC Harvey Environmental, LLC
7 Sunnygrove Drive
Odessa, Texas 79761 USA

Mobile: 432-312-7717
www.kcharvey.com

KC HARVEY

Gulf KC State Com #1 – - 2RP-168, OCD File Summary – File Date 12/17/2017, 17 pages

4/28/2008 – Water leg on gun barrel tank broke due to high winds, resulting in a release of one barrel of condensate and 19 barrels of produced water. No fluids were recovered.

5/2/2008 – Initial C-141 received by OCD. Areas impacted by the release consisted of:

- 1) Inside the tank battery around the gun barrel tank and along the berm on the east side of the tank battery. This area was reportedly excavated and the soils were placed on a liner.
- 2) The pasture on the east side of the tank battery was impacted (east berm was partially constructed). This area measured 15 feet by 30 feet.

The C-141 provided a work plan to address contaminated areas. Proposed activities included collecting soil samples from the impacted areas for TPH, BTEX, and chloride analysis. The workplan included proposed remediation activities (excavation) until TPH and BTEX concentrations met RRALs. The C-141 indicated the Site Ranking was "0" as the depth to groundwater was greater than 100 feet, the wellhead protection area was greater than 1,000 feet, and the distance to the closest water body was greater than 1,000 feet.

6/3/2008 - OCD response to Initial C-141

Remediation plan was accepted by OCD and included the following conditions:

- 1) Contaminated soil within the berm and in the pasture area would be remediated to recommended soil action levels for TPH, BTEX, and chlorides,
- 2) Sample results would be forward to OCD prior to backfilling, and,
- 3) At the completion of activities, a final C-141 would be submitted to OCD.

6/23/2008 – A *Spill Summary and Workplan* was submitted to OCD. In addition to summarizing the incident and site ranking, this document summarized remediation activities and outlined a closure plan.

The actions reportedly taken included:

- 1) The area along the east berm was excavated and the soils were stockpiled on a liner. The excavated area measured seven feet by 90 feet was 4 feet in depth.
- 2) Soil samples were collected on June 3-4 from the excavation, the area surrounding the gun barrel tank, and the impacted area in the pasture. Analytical data is summarized in the following table.

Summary of Soil Sample Results

Location	GRO (PPM)	DRO (PPM)	BTEX (PPM)	Chloride (PPM)
Bottom of excavation	11.3	175	<50	464
Westside wall of excavation	16.1	731	<50	528
Southside wall of excavation	<10	432	<50	160
East side wall of excavation	31.6	799	<50	1,250
North side wall of excavation	23.5	189	<50	176
Pasture area - surface	<48.3	1,810	<50	1,970
Pasture, 3 foot depth	NA	NA	NA	528
Gun Barrel - surface	325	6,130	<50	10,200
Stockpiled Soil (5-part composite)	<10	69.6	<50	320

NA - not analyzed

PPM – parts per million

The closure plan outline noted the following:

- 1) For the excavated area, TPH and BTEX were reported at concentrations below the RRAL. Chloride concentrations ranged from 160 to 1,250 ppm. The proposed activities were to backfill the area using previously excavated material and to reconstruct the eastside berm.
- 2) For the pasture area, TPH and BTEX were reported at concentrations below the RRAL. Chloride concentrations were reported at 1,970 ppm at the surface and 528 ppm at a depth of three feet. The proposed action was to deep rip the area which was reportedly approved by the ranch manager, Mr. Darrel Brown.
- 3) The soil sample from the gun barrel area was below the RRAL for BTEX, but exceeded the RRAL for TPH. The proposed activity for contaminated soil surrounding the gun barrel tank was excavation with disposal at an OCD-approved facility. Soil samples were proposed to be collected from this excavation for TPH, BTEX and chloride analysis. The area was proposed to be backfilled once TPH and BTEX concentrations were below applicable RRALs. The area was to be backfilled using previously excavated material and clean backfill.
- 4) At the conclusion of these activities a final C-141 was to be submitted to OCD for approval.

End of File.

District I
1625 N French Dr., Hobbs, NM 88240
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1301 W Grand Avenue, Artesia, NM 88210
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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.
Santa Fe, NM 87505

MAY - 2 2008
OCD-ARTESIA

Form C-141
Revised October 10, 2003

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

Release Notification and Corrective Action

3EB0814157019
13EB0814156857
13EB0814156583

OPERATOR

X Initial Report Final Report

Name of Company Yates Petroleum Corporation	Contact Mike Stubblefield
Address 105 South 4 th Street, Artesia, N.M. 88210	Telephone No. 505-7484500 505-513-1712
Facility Name Gulf KC State #1 30-015-22728	Facility Type Tank Battery

Surface Owner <u>Fee STATE</u>	Mineral Owner State	Lease No.
--------------------------------	---------------------	-----------

LOCATION OF RELEASE

Unit Letter C	Section 18	Township 18s	Range 25e	Feet from the 660'	North/South Line FNL	Feet from the 1980'	East/West Line FWL	County Eddy
------------------	---------------	-----------------	--------------	-----------------------	-------------------------	------------------------	-----------------------	----------------

Latitude 32.75387 Longitude 104.52654

NATURE OF RELEASE

Type of Release Produced water & condensate.	Volume of Release 19 bbls produced water & 1 bbl condensate	Volume Recovered 0
Source of Release Gun Barrel	Date and Hour of Occurrence 4/28/2008 am.	Date and Hour of Discovery 4/28/2008 3 00pm
Was Immediate Notice Given? Yes No X Not Required	If YES, To Whom	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes X No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully *

Describe Cause of Problem and Remedial Action Taken.*

The water leg on gun barrel broke due to high winds The water leg was repaired on the gun barrel.

Describe Area Affected and Cleanup Action Taken.*

The impacted area was located in the battery area around the gun barrel and along the berm on the eastside of the battery. The battery area was partially bermed. The pasture on the eastside of the battery was impacted. This area measured to be 15' x 30'. The impacted soil located within the bermed area of the battery was excavated. Removed soils were placed on a liner set on the location. Soil samples will be taken for analytical from the impacted areas. Soil samples will be sent to a second party lab & analysis ran for TPH & B-TEX and Chlorides. If the initial analytical results find the TPH & B-TEX to be over the RRAL. A work plan will be submitted to OCD for the correction of the hydrocarbons. When Analytical results reflect the TPH & B-tex to be under the RRAL. A final C-141 form will be submitted to the OCD requesting closure for the release that occurred on 4/28/2008. Final analytical results for the Chlorides will be evaluated and appropriate actions taken.

Depth to ground water > 100'. Wellhead protection area > 1000'. Distance to surface water body > 1000' Site ranking 0

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.

OIL CONSERVATION DIVISION

Signature: Mike Stubblefield

Printed Name Mike Stubblefield

Title Environmental Regulatory Agent

E-mail Address. mikes@ypcnm.com

Date: 5/1/2008

Phone 505-748-4500

Approved by District Supervisor: Timmy SB

Approval Date: 6-3-08

Expiration Date: 8-1-08

Conditions of Approval:

STIPULATIONS

Attached ☒

* Attach Additional Sheets If Necessary

3EB0814157330

2RP-168

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor

Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



June 3, 2008

Yates Petroleum Corporation
Attn: Mike Stubblefield
105 S 4th Street
Artesia, NM 88210

Reference: Gulf KC State Com 001 C-18-18S-25E
30 015 22728 Eddy County, New Mexico
2RP-168

Operator,

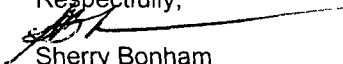
The New Mexico Oil Conservation Division District 2 Office (OCD) is in receipt of an Initial Report C-141 for a release of produced water and condensate occurring at the above referenced facility on April 28, 2008. Included on the C-141 is a plan for remediation actions.

The plan is accepted with the following stipulations:

- Contaminated soils within the bermed area and the reported approximate 450 square feet pasture area shall be remediated so that residual contaminant concentrations are below the recommended soil remediation action levels. Confirmation soil samples reflecting TPH, BTEX, and chloride constituents will be required.
- Notify the OCD 48 hours prior to obtaining samples where analyses are to be submitted to the OCD.
- Remediation requirements may be subject to change as site conditions warrant.
- Results of analytical data obtained through sampling shall be forwarded to OCD for approval **prior** to any backfilling activities.
- A final Report C-141 is to be submitted to the OCD upon satisfactory completion of remediation project.
- Remediation to be completed on or before August 1, 2008.

Please be advised that NMOCD acceptance of this plan does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of this plan does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

Respectfully,


Sherry Bonham
NMOCD District 2
1301 W Grand Avenue
Artesia, NM 88210
575.748.1283 ext. 109
sherry.bonham@state.nm.us



08/20/2024
OCD-ARTESIA

Yates Petroleum Corporation
Gulf KC State #1
Remediation Workplan
Sec. 18-18s-25e
Eddy County, N.M.

June 23, 2008

attest to the R work done
on 8/2/08
10/1/08

SPC 3/20

6/23/2008

Spill Summary and Work Plan

Incident Date: 4/28/2008

Location: Gulf KC State #1
Unit C Section 18 T18S R25E
Eddy County, New Mexico

The well is located 25 miles south west of Artesia, as depicted on the attached Dayton USGS Quadrangle Map. This site lies on the edge of a westward sloping plain cut by dry drainage channels.

Watercourses in the area are dry except for infrequent flows in response to major precipitation events. Area surface geology includes Quaternary Pleistocene conglomerate. The area, dry at the time of the spill, consists of soil that is fine grained, loamy and interspersed with clay seams providing a low permeability barrier to retard vertical percolation of contaminants into the subsurface. Groundwater in the area is estimated to be at a depth of >100 feet.

The ranking for this site is zero (0) based on the as following:

Depth to ground water	> 100'
Wellhead Protection Area	> 1000'
Distance to surface water body	> 1000'

Incident Description:

The water leg on gun barrel broke due to high winds.

The water leg was repaired on the gun barrel. The volume of the release was 19 bbls of produced water & 1 bbl condensate. Recovered volume 0 bbls produced water & 0 bbls condensate.

Action Taken:

The impacted area was located in the bermed area of the tank battery. The berm around the battery was not completed when constructed; there was a partial opening in the berm on the north side of the tank battery. The area around the gun barrel was impacted and there was a flow path running from the gun barrel to the berm located on the east side of the tank battery. Most of the release pooled in the area along the berm on the eastside of the battery. The battery area was partially bermed. A small amount of fluid ran from the opening in the berm. The pasture on the eastside of the battery was impacted. This area measured to be 15'x30'. The berm and the impacted soil running along side of the berm were immediately excavated and stockpiled on a liner, which was placed on the location. The excavated area measure to be 4' in depth x 7' wide x 90' long.

6/3/2008 using a hand auger soil samples were taken from the excavated area, the area surrounding the gun barrel and the impacted area in the pasture. The soil samples were submitted to Cardinal Lab. Analysis was run for TPH using EPA Method 8015M, B-TEX using EPA Method 8260B, and Chlorides using EPA Method 300. Analytical results for soil samples taken on 6/3/2008 from the excavated area along the berm on the east side of the tank battery reported; TPH bottom of the excavated area GRO 11.3 ppm, DRO 175 ppm, B-TEX <50 ppm. Chlorides 464 ppm, Westside wall - GRO 16.1 ppm, DRO 731 ppm, B-TEX <50 ppm. Chlorides 528 ppm, Southside wall - GRO <10 ppm, DRO 432 ppm, B-TEX <50 ppm. Chlorides 160 ppm, Eastside wall - GRO 31.6 ppm, DRO 799 ppm, B-TEX <50 ppm. Chlorides 1,250 ppm, North side wall - GRO 23.5, DRO 189 ppm, B-TEX <50 ppm, Chlorides 176 ppm.

Analytical results from soil samples taken on 6/3/2008 from outside of the bermed area in the pasture reported surface GRO <48.3 DRO 1,810 ppm, ~~B-TEX <50 ppm~~. Chlorides 1,970 ppm, Chlorides at a depth of 3' BGS in the impacted area of the pasture were reported to be CL. 528 ppm.

Analytical results from soil samples taken on 6/3/2008 in the area around the gun barrel reported surface - GRO 325 ppm, DRO 6,130 ppm, B-TEX <50 ppm. Chlorides 10,200 ppm.

A five spot composite soil sample was taken for the stockpiled soil. Analytical results reported GRO <10.0 ppm, DRO 69.6, Chlorides 320 ppm.

Damage to pasture land

Closure Plan:

Analytical results dated 6/9&10/2008 reported the TPH & B-TEX to be under the RRAL for the site from soil samples taken in the excavated area located on the eastside of the battery Chlorides were reported in ranges from 1,250 ppm to 160 ppm.

The excavated area on the eastside of the battery will be backfilled back to grade using the stockpiled soil on location. The removed berm will then be reconstructed.

Analytical results dated 6/9&10/2008 reported the TPH & B-TEX to be under the RRAL for the site from soil samples taken in the impacted area of the pasture. Chlorides were reported in the impacted area of the pasture to be 1,970 ppm at the surface, 3' BGS Chlorides declined to 528 ppm. The impacted area located in the pasture on the eastside of the battery will be deep ripped. This corrective action was approved by the Ranch manager Mr. Darrel Brown on 7/3/2008.

Analytical results dated 6/9&10/2008 reported the TPH to be above the RRAL for the site in soil samples taken on 6/3/2008 from the impacted soil located around the gun barrel. The impacted soil located around the gun barrel will be excavated and hauled to an NMOCD approved solid waste disposal facility. After excavation soil samples will be taken and then submitted to a second party lab for analysis. The soil samples submitted to lab will be tested for TPH using EPA method 8215M, B-TEX EPA method 8260B and Chlorides using EPA method 300. When analytical results taken from the excavated area around the gun barrel report the TPH & B-TEX to be under the RRAL for the site. Chlorides have been documented to decline from CL. 10,200 ppm to a range that is reasonable for the site. The excavated area will be backfilled back to grade using a combination of the stockpiled soil on location and clean soil brought to the location. A final C-141 form with attached analytical results will be submitted to the NMOCD, requesting closure for the release that occurred on 4/28/2008.

If you have questions or need additional information, please contact me at 505-748-4500.
Or E-mail me at mikes@ypcnm.com.

Sincerely,

Mike Stubblefield

Mike Stubblefield
Yates Petroleum Corporation
Environmental Regulatory Agent



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
YATES PETROLEUM CORPORATION
ATTN: MIKE STUBBLEFIELD
105 SOUTH 4TH STREET
ARTESIA, NM 88210
FAX TO: (575) 748-4635

Receiving Date: 06/04/08
Reporting Date: 06/09/08
Project Number: 30-015-22328
Project Name: GULF KC STATE COM #1 BATTERY
Project Location: SEC. 18-18S-25E

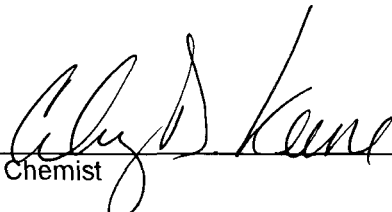
Sampling Date: 06/03/08
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: ML
Analyzed By: AB

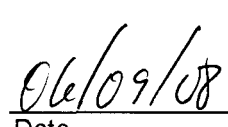
LAB NUMBER SAMPLE ID CI*
(mg/kg)

ANALYSIS DATE:		06/05/08
H14923-1	1) EXCAVATED AREA ALONG BERM BOTTOM 4' DEPTH	464
H14923-2	2) EXCAVATED AREA ALONG BERM WEST SIDE WALL	528
H14923-3	3) EXCAVATED AREA ALONG BERM SOUTH SIDE WALL	160
H14923-4	4) EXCAVATED AREA ALONG BERM EAST SIDE WALL	1,250
H14923-5	5) EXCAVATED AREA ALONG BERM NORTH SIDE WALL	176
Quality Control		490
True Value QC		500
% Recovery		98.0
Relative Percent Difference		2.0

METHODS: Std. Methods 4500-CFB

*Analyses performed on 1:4 w:v aqueous extracts.


Chemist


Date

H14923CL YATES

PLEASE NOTE: **Liability and Damages.** Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



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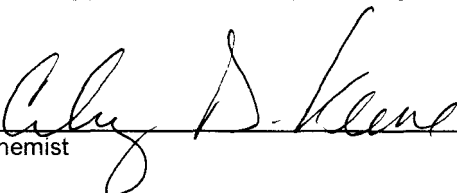
ANALYTICAL RESULTS FOR
YATES PETROLEUM CORPORATION
ATTN: MIKE STUBBLEFIELD
105 SOUTH 4TH STREET
ARTESIA, NM 88210
FAX TO: (575) 748-4635


Receiving Date: 06/04/08
Reporting Date: 06/10/08
Project Number: 30-015-22328
Project Name: GULF KC STATE COM #1 BATTERY
Project Location: SEC. 18-18S-25E

Sampling Date: 06/03/08
Sample Type: SOIL
Sample Condition: INTACT
Sample Received By: ML
Analyzed By: CK/AB

LAB NO.	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/kg)	DRO (>C ₁₀ -C ₂₈) (mg/kg)	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL BENZENE (mg/kg)	TOTAL XYLENES (mg/kg)
ANALYSIS DATE:		06/05/08	06/05/08	06/05/08	06/05/08	06/05/08	06/05/08
H14923-1	1. EXCAVATED AREA ALONG BERM BOTTOM 4' DEPTH	11.3	175	<0.010	<0.010	0.011	0.116
H14923-2	2. EXCAVATED AREA ALONG BERM WEST SIDE WALL	16.1	731	<0.010	0.010	0.015	0.159
H14923-3	3. EXCAVATED AREA ALONG BERM SOUTH SIDE WALL	<10.0	432	<0.010	<0.010	<0.010	0.057
H14923-4	4. EXCAVATED AREA ALONG BERM EAST SIDE WALL	31.6	799	<0.010	0.036	0.047	0.519
H14923-5	5. EXCAVATED AREA ALONG BERM NORTH SIDE WALL	23.5	189	<0.010	0.054	0.044	0.480
Quality Control		497	573	0.047	0.052	0.058	0.170
True Value QC		500	500	0.050	0.050	0.050	0.150
% Recovery		99.4	115	93.5	105	115	113
Relative Percent Difference		1.6	0.7	2.6	7.3	5.5	4.1

METHODS: TPH GRO & DRO - EPA SW-846 8015 M; BTEX - SW-846 8260B.


Chemist


Date

H14923BT2 YATES

PLEASE NOTE: **Liability and Damages.** Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



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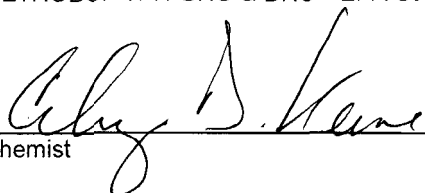
ANALYTICAL RESULTS FOR
YATES PETROLEUM CORPORATION
ATTN: MIKE STUBBLEFIELD
105 SOUTH 4TH STREET
ARTESIA, NM 88210
FAX TO: (575) 748-4635

Receiving Date: 06/04/08
Reporting Date: 06/10/08
Project Number: 30-015-22328
Project Name: GULF KC STATE COM. #1 BATTERY
Project Location: SEC. 18-18S-25E

Sampling Date: 06/03/08
Sample Type: SOIL
Sample Condition: INTACT
Sample Received By: ML
Analyzed By: CK/AB

LAB NO.	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/kg)	DRO (>C ₁₀ -C ₂₈) (mg/kg)	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL BENZENE (mg/kg)	TOTAL XYLENES (mg/kg)
ANALYSIS DATE:		06/05/08	06/05/08	06/05/08	06/05/08	06/05/08	06/05/08
H14922-1	6. IMPACTED AREA AROUND GUN BARREL SURFACE	325	6,130	<0.010	<0.010	0.026	0.354
H14922-2	7. IMPACTED AREA IN PASTURE SURFACE	48.3	1,810	<0.010	0.012	0.026	0.301
H14922-4	9. STOCKPILED SOIL FROM EXCAVATION AREA	<10.0	69.6	<0.010	<0.010	<0.010	0.035
Quality Control		497	573	0.047	0.052	0.058	0.170
True Value QC		500	500	0.050	0.050	0.050	0.150
% Recovery		99.4	115	93.5	105	115	113
Relative Percent Difference		1.6	0.7	2.6	7.3	5.5	4.1

METHODS: TPH GRO & DRO - EPA SW-846 8015 M; BTEX - SW-846 8260B.


Chemist


Date

H14922BT2 YATES

PLEASE NOTE: **Liability and Damages.** Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



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**ANALYTICAL RESULTS FOR
YATES PETROLEUM CORPORATION
ATTN: MIKE STUBBLEFIELD
105 SOUTH 4TH STREET
ARTESIA, NM 88210
FAX TO: (575) 748-4635**

Receiving Date: 06/04/08
Reporting Date: 06/06/08
Project Number: 30-015-22328
Project Name: GULF KC STATE COM. #1 BATTERY
Project Location: SEC. 18-18S-25E

Analysis Date: 06/05/08
Sampling Date: 06/03/08
Sample Type: SOIL
Sample Condition: INTACT
Sample Received By: ML
Analyzed By: AB

LAB NUMBER	SAMPLE ID	Cl ⁻ (mg/kg)
H14922-1	6. IMPACTED AREA AROUND GUN BARREL SURFACE	10,200
H14922-2	7. IMPACTED AREA IN PASTURE SURFACE	1,970
H14922-3	8. IMPACTED AREA IN PASTURE 3' DEPTH	528
H14922-4	9. STOCKPILED SOIL FROM EXCAVATION AREA	320
Quality Control		500
True Value QC		500
% Recovery		100
Relative Percent Difference		2.0

METHOD: Standard Methods

4500-CFB

Note: Analyses performed on 1:4 w:v aqueous extracts.

Kristi Supnab
Chemist

06/09/08
Date

H14922 YATES

PLEASE NOTE: **Liability and Damages.** **Cardinal's** liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by **Cardinal** within thirty (30) days after completion of the applicable service. In no event shall **Cardinal** be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by **Cardinal**, regardless of whether such claim is based upon any of the above-stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ARDINAL LABORATORIES, INC.
2111 Beechwood, Abilene, TX 79603 101 East Marland, Hobbs, NM 88240
(325) 673-0001 Fax (325) 673-7020 (505) 393-2326 Fax (505) 393-2476

Page 19 of 19

BILL TO										ANALYSIS REQUEST									
Company Name: Valdes Petroleum Corporation										Company: Valdes Petroleum Corp.									
Project Manager: Mike Stubblefield										Attn: Mike Stubblefield									
Address: 105 South 4th Street										Address: 105 South 4th Street									
City: Artesia										City: Artesia									
State: N.M. Zip: 88210										State: N.M. Zip: 88210									
Phone #: 505-748-4735										Phone #: 505-748-4735									
Fax #: 505-748-4735										Fax #: 505-748-4735									
Project Owner: Mike Stubblefield										Project Owner: Mike Stubblefield									
Project #: 30-05-22328										Project #: 30-05-22328									
Project Name: Gulf KC State Con. #1 Battery										Project Name: Gulf KC State Con. #1 Battery									
Project Location: Sec. 18-B-26C										Project Location: Sec. 18-B-26C									
Sample Name: Mike Stubblefield										Sample Name: Mike Stubblefield									
FOR LAB USE ONLY										FOR LAB USE ONLY									
Lab I.D.										Lab I.D.									
Sample I.D.										Sample I.D.									
Matrix										Matrix									
# CONTAINERS										# CONTAINERS									
GROUNDWATER										GROUNDWATER									
WASTEWATER										WASTEWATER									
SOIL										SOIL									
OIL										OIL									
SLUDGE										SLUDGE									
OTHER:										OTHER:									
ACID/BASE										ACID/BASE									
ICE / COOL										ICE / COOL									
OTHER:										OTHER:									
DATE										DATE									
TIME										TIME									
PRESERV.										PRESERV.									
SAMPLING										SAMPLING									
TPH										TPH									
BTEX										BTEX									
Chlorides										Chlorides									
1-1-4922-1 6. Impacted area around gun barrel Surface										6/3/2008 3:30 PM									
2-2-1-1 7. Impacted area in pasture Surface										6/3/2008 3:35 PM									
3-3-1-1 8. Impacted area in pasture 3' depth										6/3/2008 3:40 PM									
4-4-1-1 9. Stockpiled soil from Excavation Area.										6/3/2008 3:45 PM									

Phone Result: ☐ Yes ☐ No
Fax Result: ☐ Yes ☐ No
REMARKS:

Phone Result: ☐ Yes ☐ No
Fax Result: ☐ Yes ☐ No
REMARKS:

Received By: Mike Stubblefield Date: 6/4/2008 Time: 3:15 PM
Received By: Mike Stubblefield Date: 6/4/2008 Time: 3:15 PM
Delivered By: Mike Stubblefield
Sampler - UPS - Shor

Sample Condition: ☐ Intact? ☐ Yes ☐ No
Temp. °C: 100.0
Checked By: Mike Stubblefield

† Cardinal cannot accept verbal changes, please fax written changes to (325) 673-7020.

ARDINAL LABORATORIES, INC.

22111 Beechwood, Abilene, TX 79603 101 East Marland, Hobbs, NM 88240

(315) 673-0041 Fax (325) 673-7020 (506) 393-2326 Fax (505) 393-2476

Company Name: Yates Petroleum Corporation

of Manager: Mike Stubblefield

105 South 4th Street

by: Artesia

Phone #: 505-513-1912 Fax #: 505-748-4335

03: 30-01C-22728

Name: _____

[illegible]

11.01.2007 12:06:02
25.81.81.38

amplifier Name: Mike Stubbetfield

FURN LAB USE ONLY

Lab I.D.

Sample 17.

H4923-1
1. Excavated area along berm bottom
4' deep.

-2 2. Exhausted area along para wall side wall.

-3 Excavated Area along bottom South side Wall.

-4 4 Excavation area along brn East side of 111

5. Excavated Area along barn North side wall.

PLEASE NOTE: Liability and Damages: Cardiac ability and heart's technique must be developed without reference to any other training process for performance and any other claim will automatically be disallowed without reference to any other claim.

Write or suggestions may not be related to the performance a soldier is under by Center in person or
 sampler Relinquished:
 Date: 6/4/2008

maestro
Time: 3:10 PM
Date: 11/1/2000
Inquired By:

Mr. S. J. Hall
Subscribed Dec. 11/1890

Donated by: (Circle One)
 Sampler - UP\$ - Other: Other

† Cardinal cannot accept verbal changes, Pease fax written changes to '325) 673-7020.

JUN 15 2008
OCD-ARTESIA

Yates Petroleum Corporation
Gulf KC State #1
Remediation Workplan
Sec. 18-18s-25e
Eddy County, N.M.

June 23, 2008

6/23/2008

Spill Summary and Work Plan

Incident Date: 4/28/2008

Location: Gulf KC State #1
Unit C Section 18 T18S R25E
Eddy County, New Mexico

The well is located 25 miles south west of Artesia, as depicted on the attached Dayton USGS Quadrangle Map. This site lies on the edge of a westward sloping plain cut by dry drainage channels.

Watercourses in the area are dry except for infrequent flows in response to major precipitation events. Area surface geology includes Quaternary Pleistocene conglomerate. The area, dry at the time of the spill, consists of soil that is fine grained, loamy and interspersed with clay seams providing a low permeability barrier to retard vertical percolation of contaminants into the subsurface. Groundwater in the area is estimated to be at a depth of >100 feet.

The ranking for this site is zero (0) based on the as following:

Depth to ground water	> 100'
Wellhead Protection Area	> 1000'
Distance to surface water body	> 1000'

Incident Description:

The water leg on gun barrel broke due to high winds.

The water leg was repaired on the gun barrel. The volume of the release was 19 bbls of produced water & 1 bbl condensate. Recovered volume 0 bbls produced water & 0 bbls condensate.

Action Taken:

The impacted area was located in the bermed area of the tank battery. The berm around the battery was not completed when constructed; there was a partial opening in the berm on the north side of the tank battery. The area around the gun barrel was impacted and there was a flow path running from the gun barrel to the berm located on the east side of the tank battery. Most of the release pooled in the area along the berm on the eastside of the battery. The battery area was partially bermed. A small amount of fluid ran from the opening in the berm. The pasture on the eastside of the battery was impacted. This area measured to be 15'x30'. The berm and the impacted soil running along side of the berm were immediately excavated and stockpiled on a liner, which was placed on the location. The excavated area measure to be 4' in depth x 7' wide x 90' long.

6/3/2008 using a hand auger soil samples were taken from the excavated area, the area surrounding the gun barrel and the impacted area in the pasture. The soil samples were submitted to Cardinal Lab. Analysis was run for TPH using EPA Method 8015M, B-TEX using EPA Method 8260B, and Chlorides using EPA Method 300. Analytical results for soil samples taken on 6/3/2008 from the excavated area along the berm on the east side of the tank battery reported; TPH bottom of the excavated area GRO 11.3 ppm, DRO 175 ppm, B-TEX <50 ppm. Chlorides 464 ppm, Westside wall - GRO 16.1 ppm, DRO 731 ppm, B-TEX <50 ppm. Chlorides 528 ppm, Southside wall - GRO <10 ppm, DRO 432 ppm, B-TEX <50 ppm. Chlorides 160 ppm, Eastside wall - GRO 31.6 ppm, DRO 799 ppm, B-TEX <50 ppm. Chlorides 1,250 ppm, North side wall - GRO 23.5, DRO 189 ppm, B-TEX <50ppm, Chlorides 176 ppm.

Analytical results from soil samples taken on 6/3/2008 from outside of the bermed area in the pasture reported surface GRO <48.3 DRO 1,810 ppm, B-TEX <50 ppm. Chlorides 1,970 ppm, Chlorides at a depth of 3' BGS in the impacted area of the pasture were reported to be CL. 528 ppm.

Analytical results from soil samples taken on 6/3/2008 in the area around the gun barrel reported surface - GRO 325 ppm, DRO 6,130 ppm, B-TEX <50 ppm. Chlorides 10,200 ppm.

A five spot composite soil sample was taken for the stockpiled soil. Analytical results reported GRO <10.0 ppm, DRO 69.6, Chlorides 320 ppm.

Closure Plan:

Analytical results dated 6/9&10/2008 reported the TPH & B-TEX to be under the RRAL for the site from soil samples taken in the excavated area located on the eastside of the battery Chlorides were reported in ranges from 1,250 ppm to 160 ppm.

The excavated area on the eastside of the battery will be backfilled back to grade using the stockpiled soil on location. The removed berm will then be reconstructed.

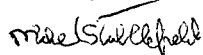
Analytical results dated 6/9&10/2008 reported the TPH & B-TEX to be under the RRAL for the site from soil samples taken in the impacted area of the pasture. Chlorides were reported in the impacted area of the pasture to be 1,970 ppm at the surface, 3' BGS Chlorides declined to 528 ppm. The impacted area located in the pasture on the eastside of the battery will be deep ripped. This corrective action was approved by the Ranch manager Mr. Darrel Brown on 7/3/2008.

Analytical results dated 6/9&10/2008 reported the TPH to be above the RRAL for the site in soil samples taken on 6/3/2008 from the impacted soil located around the gun barrel. The impacted soil located around the gun barrel will be excavated and hauled to an NMOCD approved solid waste disposal facility. After excavation soil samples will be taken and then submitted to a second party lab for analysis. The soil samples submitted to lab will be tested for TPH using EPA method 8215M, B-TEX EPA method 8260B and Chlorides using EPA method 300. When analytical results taken from the excavated area around the gun barrel report the TPH & B-TEX to be under the RRAL for the site. Chlorides have been documented to decline from CL. 10,200 ppm to a range that is reasonable for the site. The excavated area will be backfilled back to grade using a combination of the stockpiled soil on location and clean soil brought to the location. A final C-141 form with attached analytical results will be submitted to the NMOCD, requesting closure for the release that occurred on 4/28/2008.

If you have questions or need additional information, please contact me at 505-748-4500.

Or E-mail me at mikes@ypcnm.com.

Sincerely,



Mike Stubblefield
Yates Petroleum Corporation
Environmental Regulatory Agent

Bratcher, Mike, EMNRD

From: Mike Stubblefield [mikes@YPCNM.COM]
Sent: Tuesday, August 12, 2008 9:59 AM
To: Bratcher, Mike, EMNRD
Cc: Jerry Fanning
Subject: Soil samples to be taken for Analytical on 8/14/2008.

Dear Mr. Mike Bratcher,

Yates Petroleum Corporation will be taking soil samples for analytical at the following facilities.

30-015-22728 Ut.C 18-18s-25e Gulf KC State #1 Sampling date: 8/14/2008 Time: 9:30am.
30-015-10800 Ut.O 25-18s-25e Gerard "AW" Battery Sampling date: 8/14/2008 Time: 10:30am.
30-015-22891 Ut.G 1-19s-24e SRC "KZ" State Battery Sampling date 8/14/2008 Time 11:30am. 3:00
30-015-21881 Ut.J 36-19s-24e Dee 36 State Battery Sampling date: 8/14/2008 Time: 2:00pm.

If I can be of further assistance please contact me at 575-513-1712.

Sincerely,
Mike Stubblefield

This inbound email has been scanned by the MessageLabs Email Security System.

Rec'd 17
Call off him
I will go in
with him in truck
- Rock collections

Bratcher, Mike, EMNRD

From: Mike Stubblefield [mikes@YPCNM.COM]
Sent: Tuesday, August 12, 2008 11:15 AM
To: Bratcher, Mike, EMNRD
Cc: Jerry Fanning
Subject: Soil Samples to be taken for analytical on 8/15/2008.

Dear Mr. Mike Bratcher,

Yates Petroleum Corporation will be taking soil samples for analytical at the following facilities.

30-015-33733 Ut.I 16-19s-26e Clayton BFO State Com. #1 Sampling date: 8/15/2008 Time: 9:30am.
30-015-32709 Ut.M 27-16s-27e Mucho Luck BBW Federal Com. #1 Sampling date: 8/15/2008 Time: 10:30am
30-015-32095 Ut.H 24-18s-30e Creek AL #15 Sampling date: 8/15/2008 Time: 1:30pm
30-015-35316 Ut.A 4-23s-31e Glowworm "ALX" Federal #14 Sampling date: 8/15/2008 Time: 3:00pm.

If I can be of further assistance please contact me at 575-513-1712.

Sincerely,

Mike Stubblefield

This inbound email has been scanned by the MessageLabs Email Security System.

Site Ranking: 0

Gulf KC State 1

YPC

Mike Stubblefield 513.1712

CONTACT

18
Section

18S
Twtnshp

25E
Range

UL: C

32.75399
Latitude

104.52674
Longitude

Released to Imaging: 8/20/2024 7:25:02 AM

Bratcher, Mike, EMNRD

From: Dan Gibson <dgibson@kcharvey.com>
Sent: Monday, January 8, 2018 11:23 AM
To: Bratcher, Mike, EMNRD
Cc: Chase Settle (chase_settle@eogresources.com)
Subject: RE: Gulf KC State Com#1 2RP-168
Attachments: OCD File Summary.pdf; State file 12 12 2017.pdf

Mike –

Happy New Year!

I just wanted to check in and see if you have had an opportunity to review the documents I sent.

Thanks,

Daniel K. Gibson, P.G.
Permian Basin Regional Manager

KC Harvey Environmental, LLC
2626 JBS Parkway
Suite B120
Odessa, Texas 79761 USA

Office 432-614-6096
Mobile: 432-312-7717
www.kcharvey.com



From: Dan Gibson
Sent: Tuesday, December 19, 2017 12:13 PM
To: Mike Bratcher (mike.bratcher@state.nm.us)
Cc: Chase Settle (chase_settle@eogresources.com)
Subject: Gulf KC State Com#1 2RP-168

Mike:

Thanks again for getting the file on the OCD website. I've reviewed the file and prepared the attached summary. I've also included a copy of the documents in the OCD file.

The June 23, 2008 Spill Summary and Workplan provides documentation on the remediation and sampling activities in early June 2008. It also provides a workplan for the issues required to close the site. While the file does not indicate these activities were completed, the absence of a soil stockpile and the fact there is no open excavation on site suggest these activities may be complete. The remaining remediation activities were focused on the gun barrel tank area. To evaluate if this area was remediated, we propose to collect soil samples from two shallow soil borings. These samples will be submitted for TPH, BTEX and chloride analysis using approved OCD methods. The results of these samples should provide sufficient analytical data to determine if additional soil remediation is required.

The file also provides sample results from the pasture area. The file indicates TPH and BTEX levels are below RRALs. Chloride concentrations were 1,970 ppm at the surface and 528 ppm at a depth of three feet. The proposed action was to deep rip the area which was reportedly approved by the ranch manager. To evaluate if additional activities are warranted, we propose to inspect the area and compare the vegetation present in this area with the surrounding land. If the vegetative coverage is similar, we propose no further action.

When the sample results are available and the site inspection is complete, the documentation will be provided to OCD along with a proposed scope of any additional activities that may be required. If OCD agrees no further action is required, a final C-141 will be submitted.

Thanks,

Daniel K. Gibson, P.G.
Permian Basin Regional Manager

KC Harvey Environmental, LLC
7 Sunnygrove Drive
Odessa, Texas 79761 USA

Mobile: 432-312-7717
www.kcharvey.com



Bratcher, Mike, EMNRD

From: Dan Gibson <dgibson@kcharvey.com>
Sent: Friday, January 19, 2018 1:01 PM
To: Bratcher, Mike, EMNRD
Cc: Chase Settle (chase_settle@eogresources.com)
Subject: 2RP-168 Gulf State Com#1

Mike – I talked with Chase at EOG. They have set an internal target of May 1, 2018 to close this project. Do you think we can make this target date? Completion by May 1 allows the seeding to be performed at a good time of the year. I know you're likely swamped, so let me know if there is anything I can do to assist in this process.

Thanks,

Daniel K. Gibson, P.G.
Permian Basin Regional Manager

KC Harvey Environmental, LLC
2626 JBS Parkway
Suite B120
Odessa, Texas 79761 USA

Office 432-614-6096
Mobile: 432-312-7717
www.kcharvey.com



Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Monday, March 5, 2018 12:56 PM
To: 'Dan Gibson'
Cc: Chase Settle (chase_settle@eogresources.com)
Subject: RE: Gulf KC State Com#1 2RP-168

RE: EOG Y * Gulf KC St Com 1 * 2RP-168 * DOR: 4/28/08

Dan,

Your proposal to re-evaluate the above referenced release site is approved. Please advise once activities at the site have been scheduled.

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Dan Gibson [mailto:dgibson@kcharvey.com]
Sent: Monday, January 8, 2018 11:23 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Chase Settle (chase_settle@eogresources.com) <chase_settle@eogresources.com>
Subject: RE: Gulf KC State Com#1 2RP-168

Mike –

Happy New Year!

I just wanted to check in and see if you have had an opportunity to review the documents I sent.

Thanks,

Daniel K. Gibson, P.G.
Permian Basin Regional Manager

KC Harvey Environmental, LLC
2626 JBS Parkway
Suite B120
Odessa, Texas 79761 USA

Office 432-614-6096
Mobile: 432-312-7717

www.kcharvey.com



From: Dan Gibson
Sent: Tuesday, December 19, 2017 12:13 PM
To: Mike Bratcher (mike.bratcher@state.nm.us)
Cc: Chase Settle (chase_settle@eogresources.com)
Subject: Gulf KC State Com#1 2RP-168

Mike:

Thanks again for getting the file on the OCD website. I've reviewed the file and prepared the attached summary. I've also included a copy of the documents in the OCD file.

The June 23, 2008 Spill Summary and Workplan provides documentation on the remediation and sampling activities in early June 2008. It also provides a workplan for the issues required to close the site. While the file does not indicate these activities were completed, the absence of a soil stockpile and the fact there is no open excavation on site suggest these activities may be complete. The remaining remediation activities were focused on the gun barrel tank area. To evaluate if this area was remediated, we propose to collect soil samples from two shallow soil borings. These samples will be submitted for TPH, BTEX and chloride analysis using approved OCD methods. The results of these samples should provide sufficient analytical data to determine if additional soil remediation is required.

The file also provides sample results from the pasture area. The file indicates TPH and BTEX levels are below RRALs. Chloride concentrations were 1,970 ppm at the surface and 528 ppm at a depth of three feet. The proposed action was to deep rip the area which was reportedly approved by the ranch manager. To evaluate if additional activities are warranted, we propose to inspect the area and compare the vegetation present in this area with the surrounding land. If the vegetative coverage is similar, we propose no further action.

When the sample results are available and the site inspection is complete, the documentation will be provided to OCD along with a proposed scope of any additional activities that may be required. If OCD agrees no further action is required, a final C-141 will be submitted.

Thanks,

Daniel K. Gibson, P.G.
Permian Basin Regional Manager

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District IV
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Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 375408

CONDITIONS

Operator: EOG Y RESOURCES, INC. 104 S 4th St Artesia, NM 88210	OGRID: 25575
	Action Number: 375408
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
bhall	Historical documentation upload	8/20/2024