

**APPROVED**

October 14, 2024

DCP Operating Company, LP  
6900 E Layton Ave., Suite 900  
Denver, CO 80237-3658

Attn: Mr. Steve Weathers  
Email: [stephen.weathers@p66.com](mailto:stephen.weathers@p66.com)

Re: Vadose Zone Sampling Plan  
Hobbs Gas Plant  
UL "G", Section 36, Township 1  
NMOCD Incident No. nPAC0706  
Tasman Project No. 4660

Review of the Vadose Zone Sampling Plan for the Hobbs Gas Plant, App ID: 392679 has been reviewed and is approved to include the following conditions of approval:

1. In addition to the four (4) proposed sampling boreholes, please include a fifth borehole for sampling and analysis approximately 25 feet southeast of MW-BR. Historically, this well had consistently demonstrated the presence of LNAPL and residual LNAPL may still be present in the vadose zone.
2. Sample each of the five (5) boreholes every 10 feet and submit soil lab analyses for BTEX and PAH by EPA method 8021B and 8270.
3. Report results to NMOCD in sixty (60) days from the date of this approval, 10.15.2024 with recommendations from DCP on the next step for remediation and/or closure for the groundwater incident.

Dear Mr. Weathers,

Tasman, Inc. (Tasman) is pleased to submit this Vadose Zone Sampling Plan to DCP Operating Company, LP (DCP) detailing proposed assessment activities at the above referenced site.

To demonstrate that the vadose zone beneath the site has been abated of chemicals of concern in accordance with New Mexico Administrative Code (NMAC) 19.15.30, Tasman proposes to advance four soil borings at the site. See the attached Figure 1 for proposed soil boring locations.

Soil borings will be advance using a sonic drilling rig to depth of approximately 65 feet below ground surface. The observed potentiometric surface during the August 2024 groundwater monitoring event is on average 78 feet bgs. Soil samples will be collected continuously during drilling activities. One sample will be selected every five feet to be screened for volatile organic compounds using a photoionization detector (PID). Soil cuttings will be handled according to regulatory requirements and generally accepted industry practices.

A minimum of two soil samples from each soil boring will be selected for laboratory analysis. These being the sample exhibiting the highest PID reading, and the sample collected from the terminal depth. Soil samples submitted to the laboratory will be analyzed using Environmental Protection Agency (EPA) methods or other NMOCD-approved methods. Laboratory analytical methods are as follows:

- Total Petroleum Hydrocarbons (TPH) – gasoline, diesel, and motor/lube oil range organics (GRO+DRO+MRO) – EPA Method 8015M Extended.
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX) – EPA Method 8021B.

Collected soil samples will be placed in laboratory provided containers, properly labeled, and preserved on ice pending delivery under a chain of custody form to Cardinal Laboratory in Hobbs, New Mexico.

It is anticipated that the proposed activities in this work plan will be completed by October 25, 2024. Tasman will include the findings of the vadose zone sampling activities within a Closure Request Report to be submitted during the fourth quarter of 2024.

Tasman recommends presenting the above proposed delineation plan to the New Mexico Oil Conservation Division (NMOCD) for approval prior to initiating the proposed activities.

Tasman appreciates the opportunity to provide environmental services to DCP Operating Company, LP. Should you have any questions or require additional information, please do not hesitate to contact the undersigned.

Sincerely,  
**Tasman, Inc.**

Brett Dennis  
Senior Project Manager  
[bdennis@tasman-geo.com](mailto:bdennis@tasman-geo.com)

Kyle Norman  
SW Regional Manager  
[knorman@tasman-geo.com](mailto:knorman@tasman-geo.com)

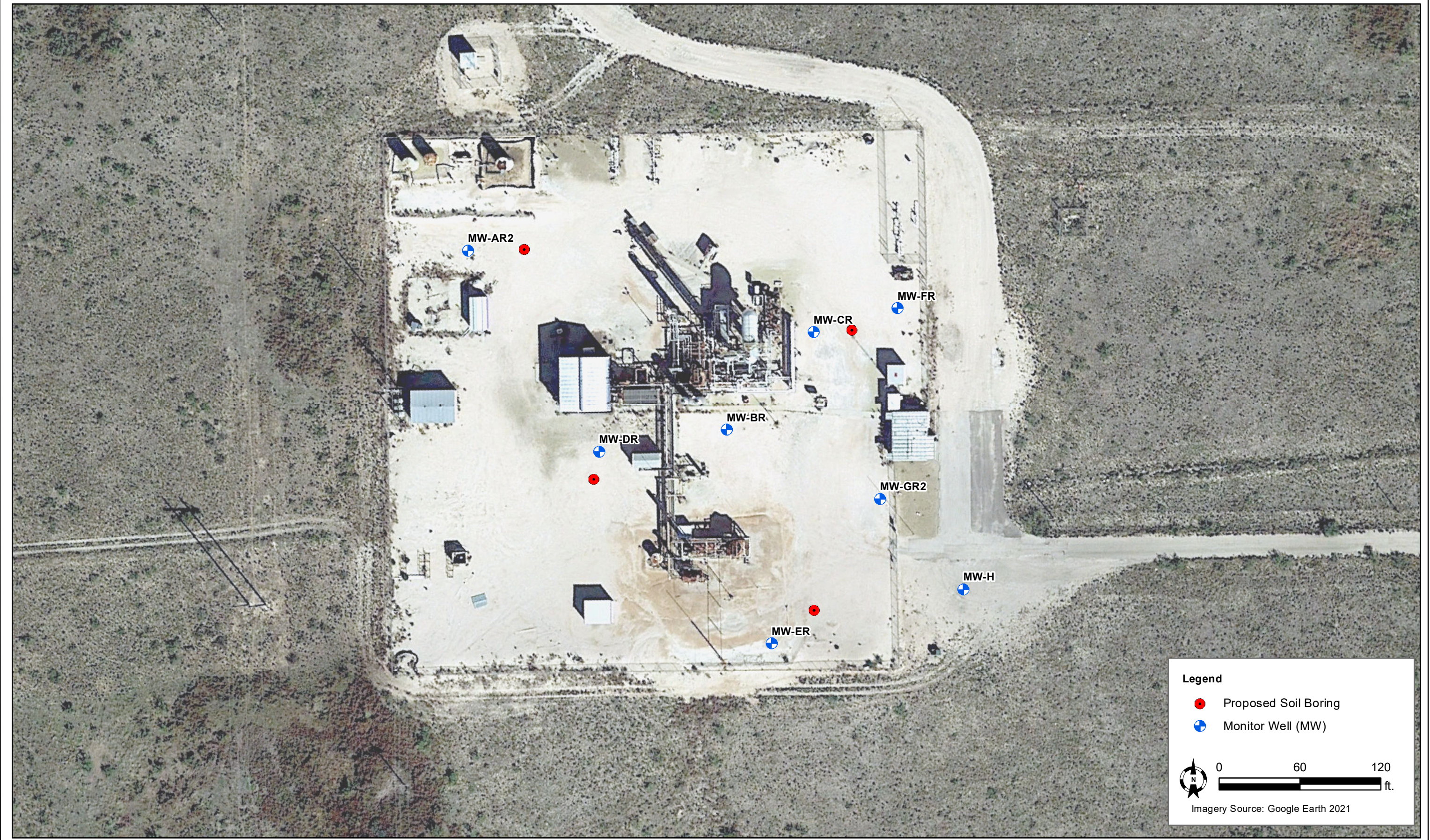
### **Attachments**

#### **Figures**

Figure 1 – Proposed Sampling Map

## **FIGURES**





DATE:	October 2023
DESIGNED BY:	B. Dennis
DRAWN BY:	B. Dennis



**Tasman, Inc.**  
6855 W. 119th Ave  
Broomfield, CO 80020

**DCP Operating Company, LP**  
**Hobbs Gas Plant - nPAC0706832026**  
SWNE, Section 36, Township 18 South, Range 36 East  
Lea County, New Mexico

Proposed Sampling Map

**Figure**  
**1**



**District I**  
1625 N. French Dr., Hobbs, NM 88240  
Phone:(575) 393-6161 Fax:(575) 393-0720  
**District II**  
811 S. First St., Artesia, NM 88210  
Phone:(575) 748-1283 Fax:(575) 748-9720  
**District III**  
1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170  
**District IV**  
1220 S. St Francis Dr., Santa Fe, NM 87505  
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 392679

CONDITIONS

Operator: DCP OPERATING COMPANY, LP 2331 Citywest Blvd Houston, TX 77042	OGRID:
	36785
	Action Number:
	392679
Action Type: [UF-GWA] Ground Water Abatement (GROUND WATER ABATEMENT)	

CONDITIONS

Created By	Condition	Condition Date
michael.buchanan	Review of the Vadose Zone Sampling Plan for the Hobbs Gas Plant, App ID: 392679 has been reviewed and is approved to include the following conditions of approval: 1. In addition to the four (4) proposed sampling boreholes, please include a fifth borehole for sampling and analysis approximately 25 feet southeast of MW-BR. Historically, this well had consistently demonstrated the presence of LNAPL and residual LNAPL may still be present in the vadose zone. 2. Sample each of the five (5) boreholes every 10 feet and submit soil lab analyses for BTEX and PAH by EPA method 8021B and 8270. 3. Report results to NMOCD in sixty (60) days from the date of this approval, 10.15.2024 with recommendations from DCP on the next step for remediation and/or closure for the groundwater incident.	10/15/2024