

From: [Billings, Bradford, EMNRD](#)
To: [Bratcher, Mike, EMNRD](#); [Weaver, Crystal, EMNRD](#)
Subject: FW: Excavation Plan Finley Site 2RP-3461 & 2RP-3568
Date: Thursday, January 5, 2017 7:55:22 AM
Attachments: [2016-12-20_FinleyResources_Excavation-workplan.pdf](#)

Mornin'

Have a look at this, we can talk about it with the other site from yesterday on the phone this AM. Give a call we you get together. Thanks. Cortez wants to start pretty soon. Will forward his notification on start time. Hasta

Brad

From: Christopher Cortez [mailto:chris@atkinseng.com]
Sent: Tuesday, December 20, 2016 11:21 AM
To: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Cc: TKinch@finleyresources.com; CStrawn@finleyresources.com; djferguson@eprod.com; LScaggs@apexc.com; Jim Coburn <jim.coburn@atkinseng.com>
Subject: Excavation Plan Finley Site 2RP-3461 & 2RP-3568

Mr. Billings,

Attached please find the excavation workplan requested from our meeting on 11/14/2016

If you have any questions, please let me know

Thanks,

Christopher R. Cortez | Operations Manager
Atkins Engineering Associates Inc.
2904 W 2ND ST | Roswell, NM 88201-1209
Office 575.624.2420 | Mobile 575.914.0174
chris@atkinseng.com



2904 W 2nd St.
Roswell, NM 88201
voice: 575.624.2420
fax: 575.624.2421
www.atkinseng.com

12/20/2016

Brad Billings
Hydrologist
Oil Conservation Division/Environmental Bureau
District II
811 South First Street
Artesia, NM 88210

Transmitted via email on the date of this letter to bradford.billings@state.nm.us

**Re: Excavation and Backfill work plan for Finley Station NW¼ SW ¼, S25 T21S R27E
Eddy County, New Mexico NMOCD RP #: 2RP-3461 & 2RP-3568**

Mr. Billings:

In October 2016, Apex/TITAN submitted reports to the New Mexico Oil and Conservation Division (NMOCD) as follows:

Site Investigation Summary Report, Finley Station, NW¼ SW ¼, S25 T21S R27E, Eddy County, New Mexico, NMOCD RP #: 2RP-3461 & 2RP-3568

Response Action Summary Report, Finley Station, NW¼ SW ¼, S25 T21S R27E, Eddy County, New Mexico, NMOCD RP #: 2RP-3461

On a November 14, 2016 teleconference, NMOCD requested excavation of the uppermost four (4) feet of impacted soils in the vicinity of soil boring SB-3 as presented on *Figure 5 – Benzene Concentration in Soil Map* of the *Site Investigation Summary Report* (Apex/TITAN, Oct. 2016). Impacted soils shall be removed radially from SB-3 based on field screening and visual observations. The proposed excavation will be limited in the eastern and southern directions by the clean backfilled boundaries of the previous Apex/TITAN excavation.

Field activities will be supervised by Jim Coburn, PE (AEA) for Finley Resources, and an Apex/TITAN representative will be on site for Enterprise Field Services LLC. Prior to starting

excavation activities, the contracted excavator will contact the 811 New Mexico One Call system to locate and identify all underground utilities that may be affected. AEA will develop and enforce a site specific Health and Safety Plan (HASP).

AEA will notify Finley Resources, Enterprise Field Services, LLC and the NMOCD project manager, a minimum of five (5) days before proceeding with any fieldwork. AEA anticipates the field work should take approximately one (1) week to complete. Field work is planned for mid to late January 2017.

Observations of the soil and a photo-ionization detector (PID) will be used to define the lateral extent of the excavation. The excavation will be limited to a depth of four (4) feet below ground surface. Per the conference call, no laboratory confirmatory soil samples shall be collected during excavation activities.

Excavated soils will be disposed at Lea Land Landfill. This NMOCD-approved facility is permitted to treat petroleum hydrocarbon contaminated soils and is located approximately 25 miles east of Carlsbad, New Mexico.

The excavation will be backfilled with certified clean fill material and will include placement of fill material in 8-inch lifts and compacted to minimize soil settlement. The Site will be restored to pre-excavation conditions and include pea gravel surface material.

AEA will submit a report of excavation activities.

Please do not hesitate to contact me with any questions or concerns.

Sincerely,



Jim Coburn P.E.
Consulting Engineer
jim.coburn@atkinseng.com

Cc: Troy Kinch via email TKinch@finleyresources.com
Colin Strawn via email CStrawn@finleyresources.com
Dina Ferguson via email djferguson@eprod.com
Liz Scaggs via email LScaggs@apexc.com

From: [Billings, Bradford, EMNRD](#)
To: [Christopher Cortez](#); [Bratcher, Mike, EMNRD](#); [Weaver, Crystal, EMNRD](#)
Cc: [TKinch@finleyresources.com](#); [CStrawn@finleyresources.com](#); [djferguson@eprod.com](#); [LScaggs@apexcos.com](#); [Jim Coburn](#)
Subject: RE: Excavation Plan Finley Site 2RP-3461 & 2RP-3568
Date: Wednesday, January 11, 2017 2:03:09 PM

Dear Chris,

You may proceed as per the work plan submitted to OCD 12/20/2016. Please submit report following soils work with all accumulated data, drawings with scale and photographs. Also be advised, that you may plug and abandon the associated monitor wells at the location, but again, do this procedure near the end of the soil removal/replacement. And, as per our discussions, a liner is not mandated at this location for this endeavor.

Be reminded, if associated companies agree, when you submit this report, to request closure of both allied RP's, and a Final C-141 for each. OCD will then evaluate for closure. We appreciate your efforts on behalf of your clients.

I have informed OCD staff in Artesia of your anticipated time frames for field work, but if you would please, when it looks to be set, please give Mike Bratcher or Crystal Weaver a call in Artesia as we would like to visit the operations. Again, thank you and look forward to hearing from you.

Sincerely,

Bradford Billings
OCD/Santa Fe
District II Hydrologist/E.Spec.

From: Christopher Cortez [mailto:chris@atkinseng.com]
Sent: Tuesday, December 20, 2016 11:21 AM
To: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Cc: TKinch@finleyresources.com; CStrawn@finleyresources.com; djferguson@eprod.com; LScaggs@apexcos.com; Jim Coburn <jim.coburn@atkinseng.com>
Subject: Excavation Plan Finley Site 2RP-3461 & 2RP-3568

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If you have any questions, please let me know

Thanks,

Christopher R. Cortez | Operations Manager
Atkins Engineering Associates Inc.
2904 W 2ND ST | Roswell, NM 88201-1209

Office 575.624.2420 | Mobile 575.914.0174
chris@atkinseng.com



Bratcher, Mike, EMNRD

From: Ferguson, Dina <djferguson@eprod.com>
Sent: Tuesday, March 08, 2016 1:10 PM
To: Bratcher, Mike, EMNRD; Thompson, Roger; Jim Nance; Juakin Robles
Cc: Billings, Bradford, EMNRD; Patterson, Heather, EMNRD
Subject: RE: Finley Compressor Station Site

Mike, Enterprise received approval from OSE for the installation of up to 5 monitor wells this week. Enterprise recognized that the review and approval process to authorize the installation of the wells could slow down further action and chose to request more than the agreed 3 monitor wells.

Enterprise has continued site inspections to ensure personnel and wildlife are protected to the extent possible and additional fencing was installed to protect personnel and livestock. Enterprise has not received any notification from Finley Resources regarding the soil investigation planned for the areas underneath the previous tank locations.

As discussed during the Artesia meeting, Enterprise continued down the path for authorization of the installation of the monitor wells which is now complete but will hold on the field activities until Finley has completed the soil investigation.

From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
Sent: Tuesday, March 08, 2016 12:04 PM
To: Ferguson, Dina; Thompson, Roger; Jim Nance; Juakin Robles
Cc: Billings, Bradford, EMNRD; Patterson, Heather, EMNRD
Subject: Finley Compressor Station Site

Good Morning all,

Please provide OCD with an update as to where the two companies stand on moving forward on this site.

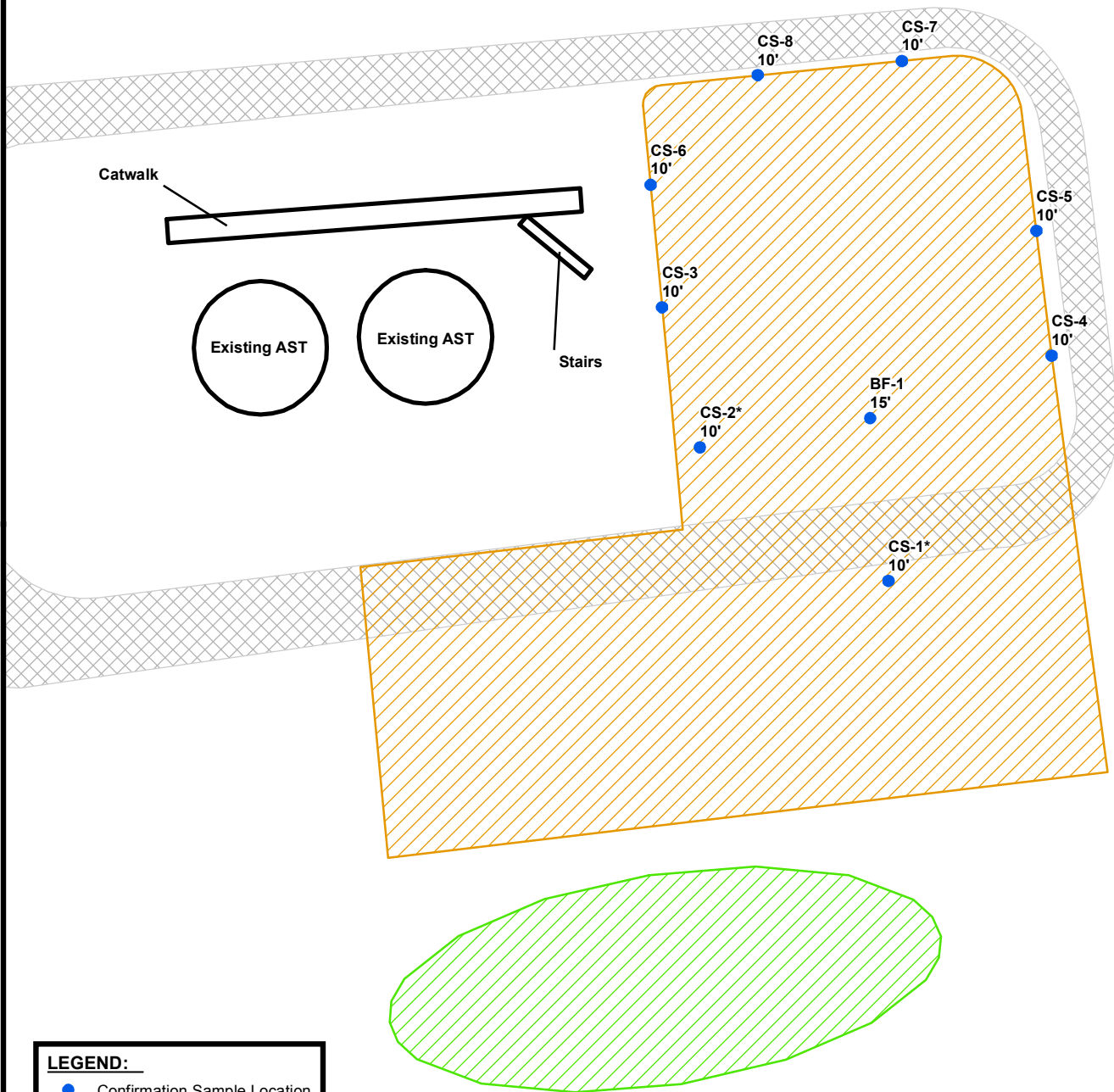
Thank you,

Mike Bratcher
NMOCD District 2
811 S. First Street
Artesia, NM 88210
O: 575-748-1283 X108
C: 575-626-0857
F: 575-748-9720

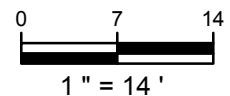
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NOTE:

* - Denotes a Sample Taken from the Limits of the Initial Excavation.
Existing ASTs are Owned by Finley Resources, Inc.

**LEGEND:**

- Confirmation Sample Location
- ▨ Excavation Area
- ▭ Existing ASTs
- ▤ Existing Berm Location
- ▨ Stockpile Location



Enterprise Field Services, LLC
Finley Station
Eddy County, New Mexico
32.448843 N, 104.149520 W

Project No. 7250715084



Apex TITAN, Inc.
505 N Big Spring St., Suite 301A
Midland, Texas 79701
Phone: (432) 695-6016
www.apexcos.com
A Subsidiary of Apex Companies, LLC

FIGURE 3

Site Map



TABLE 1
SOIL SAMPLE ANALYTICAL RESULTS
Finley Station

Sample I.D.	Sample Date	Sample Depth (feet bgs)	Benzene (mg/Kg)	Toluene (mg/Kg)	Ethylbenzene (mg/Kg)	Xylenes (mg/Kg)	Total BTEX (mg/Kg)	TPH GRO (mg/Kg)	TPH DRO (mg/Kg)	TPH GRO/DRO (mg/Kg)	Chlorides (mg/Kg)
New Mexico Oil Conservation Division (NMOCD) Recommended Remediation Action Levels (RRALs) (Total Ranking Score: 20)											
New Mexico Oil Conservation Division (NMOCD) Recommended Remediation Action Level			10	NE	NE	NE	50	NE	NE	100	250
CONFIRMATION SAMPLE ANALYTICAL RESULTS											
CS-1	9/1/2015	10	12.5	126	23.9	390	553	5,290	3,490	9,600	4,730
CS-2	9/1/2015	10	0.766	8.21	3.86	58.3	71.1	655	836	1,490	3,670
CS-3	9/1/2015	10	1.01	15.5	4.49	77.5	98.5	744	542	1,290	2,600
CS-4	9/1/2015	10	0.354	5.19	2.10	36.4	44.1	784	1,130	1,930	4,290
CS-5	9/1/2015	10	3.63	41.0	7.74	160	212	4,050	2,340	6,420	2,720
CS-6	9/1/2015	10	<0.0998	0.870	1.34	29.6	31.8	172	157	329	3,660
CS-7	9/1/2015	10	10.5	88.5	17.4	345	462	11,700	17,800	32,600	14,600
CS-8	9/1/2015	10	3.90	53.4	12.0	193	262	4,440	3,690	8,210	6,150
BF-1	9/1/2015	15	0.0388	0.140	0.0555	0.936	1.17	64.5	187	252	2,140

mg/Kg- milligrams per Kilograms

NA-Not Analyzed

Note: concentrations in **bold** and yellow exceed the applicable OCD Remediation Action Level

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 400057

CONDITIONS

Operator: ENTERPRISE PRODUCTS OPERATING, LLC P.O. BOX 4324 HOUSTON, TX 77210	OGRID: 374092
	Action Number: 400057
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	Historical document upload.	11/6/2024