

NM1 - 23

**APPROVED
BACKGROUND
SAMPLING
PLAN**

Sept. 17, 2014

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

David Martin
Cabinet Secretary

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Bailey, Division Director
Oil Conservation Division



September 17, 2014

Ms. Judy L. Roberts
J & L Landfarm, Inc.
P.O. Box 356
Hobbs, New Mexico 88241-0356

**RE: 2014 Background Soil Testing Protocol Review
J & L Landfarm, Inc.
J & L Landfarm – Permit NM1-023
N/2, N/2 of Section 9 and the N/2, N/2 of Section 10, Township 20 South, Range 38
East, NMPM, Lea County**

Dear Ms. Roberts:

The Oil Conservation Division (OCD) has completed the review of J & L Landfarm, Inc.'s (J&L) 2014 Background Soil Testing Protocol, submitted on J&L's behalf by Matt Lane of GL Environmental, Inc. via an email dated September 17 2014, which proposes a background sampling plan to re-establish a new facility background and PQLs in order to compare to the vadose zone monitoring results to determine if a release had occurred and if follow-up actions are required to be completed. The initial March 26, 1999 background sample results identified the presence of Total Petroleum Hydrocarbons (TPH). Historical sampling data demonstrates and supports that TPH is not naturally occurring in the vadose zone, 2-3 feet below the ground surface.

Based on the information provided in the request, the background sampling plan is hereby approved with the following understandings and conditions:

1. J&L shall comply with all applicable requirements of the Oil and Gas Act (Chapter 70, Article 2 NMSA 1978), all conditions specified in this approval, and shall operate in accordance with the September 17 2014 submittal;
2. J&L shall obtain the practical quantitation limits (PQLs) for the background constituents from the laboratory which will perform the analysis on the background samples for comparison to the background results in order to determine which is greater to complete the vadose monitoring assessment;

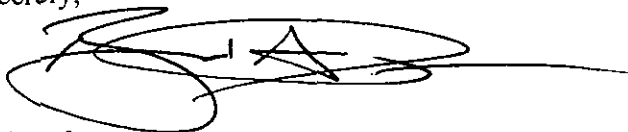
Ms. Roberts
J & L Landfarm, Inc.
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3. J&L shall compare vadose zone monitoring results to the background results or PQL (whichever is higher) in order to determine if a release had occurred and if additional follow-up actions of 19.15.36.15.E.(5) NMAC are required to be completed; and
4. J&L shall obtain written approval from OCD prior to implementing any changes to the September 17 2014 background sampling plan.

Please be advised that approval of this request does not relieve J&L of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve J&L of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brad A. Jones', with a long horizontal line extending to the right.

Brad A. Jones
Environmental Engineer

BAJ/baj

Cc: OCD District I Office, Hobbs
Matthew Lane, GL Environmental Inc., PO Box 1746, Las Vegas, NM 87701

Jones, Brad A., EMNRD

From: Matthew Lane <glmatt@flash.net>
Sent: Wednesday, September 17, 2014 2:12 PM
To: Jones, Brad A., EMNRD
Cc: skip tabor; Tim Leftwich
Subject: Re: J&L Landfarm Background Soil Testing Protocol
Attachments: J&L_Landfarm_BG_testing_protocol_final.pdf

Brad,

Please find attached the revised protocol with the requested sample depth (2 - 3 ft).

Regards,

Matthew Lane
GL Environmental, Inc.
Phone: 505.454.0830
Cell: 505.350.5141

On Wednesday, September 17, 2014 1:37 PM, "Jones, Brad A., EMNRD" <brad.a.jones@state.nm.us> wrote:

From: Matthew Lane [<mailto:glmatt@flash.net>]
Sent: Wednesday, September 17, 2014 11:15 AM
To: Jones, Brad A., EMNRD
Cc: skip tabor; Tim Leftwich
Subject: J&L Landfarm Background Soil Testing Protocol

Brad,

Please find attached the J&L Landfarm Background Soil Testing Protocol for your review. Please let me know if you have any questions or comments.

Regards,

Matthew Lane
GL Environmental, Inc.
Phone: 505.454.0830
Cell: 505.350.5141



September 17, 2014

Brad Jones
Environmental Engineer
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

RE: Proposed 2014 Background Soil Testing Protocol for J&L Landfarm, Permit NM-01-0023, N/2 N/2 of Section 9 and N/2 N/2 of Section 10, Township 20 South, Range 38 East

Mr. Jones:

Please accept the following proposed protocol for background soil testing at the J&L Landfarm. Background soil samples will consist of three composite samples that each consist of 10 discrete sub-samples. Composite samples will be collected from each of three sample areas located on the undeveloped western portion of the J&L Landfarm permit area (See attached map). Samples will be collected from two to three feet below the original the ground surface at locations within the permit area that have not been impacted by previous operations or otherwise disturbed. The samples will be analyzed for:

- TPH as determined by EPA method 418.1
- BTEX as determined by EPA SW 846 method 8260B
- Constituents listed in Subsections A and B of 20.6.2.3103 NMAC using EPA approved Methods

In the absence of anomalous results, the analyte concentrations from the three composite samples will be averaged to establish background soil conditions. Please let me know if you have any questions or comments.

Sincerely,

Matthew Lane
GL Environmental, Inc.

Attachment – J&L Landfarm 2014 Background Soil Testing map



J & L Landfarm - 2014 Background Soil Testing Map

Property Boundary
 Treatment cell
 Background Testing Zone

