1R - 492

WORKPLANS

DATE: 6/06/2008



Highlander Environmental Corp. ». MECE/VED: 2008 JUL 15 FM 3 37

1R49L

Midland, Texas

June 6, 2008

Mr. Glenn von Gonten New Mexico Energy, Minerals, & Natural Resources Oil Conservation Division, Environmental Bureau 1220 S. St. Francis Drive Santa Fe, New Mexico 87504

Re: Response to Request for a Remediation Plan for the OXY USA, Inc., E.C. Hill Federal #7 Tank Battery, Located in Section 35, Township 23 South, Range 37 East, Lea County, New Mexico, OCD Case No. 1R492.

Dear Mr. Gonten:

Highlander Environmental Corp. (Highlander) was engaged to investigate this site as part of a due diligence assessment. This site is adjoined on the west by the E.C. Hill B-D Tank Battery, OCD Case # 1R491. The groundwater investigation and remediation of these sites will be conducted concurrently. The site location is shown on Figures 1 and 2.

FACILITY BACKGROUND

This facility is an old battery, which has had numerous spills from previous operators. Prior to OXY, the facility was operated by Plains Exploration, Pogo Producing Company and Latigo Petroleum, Inc. In March 2008, OXY assumed operating responsibility for this site from PXP.

Based upon the initial site investigation, a soils investigation was performed. The soil investigation consisted of placement of seven auger holes (AH) and one borehole (BH) in an impacted area south of the tank battery, to assess the subsurface soils. The borehole was converted to a monitor well to assess the groundwater qualities at the Site.

Total Petroleum Hydrocarbon (TPH) concentrations exceeded the RRAL to a depth of 40 feet below ground surface (bgs) in the soil boring BH-1. The hand auger and borehole locations are shown on Figure 3. The analytical results are shown in Table 1 and Table 2.

Based on the results, borehole (BH-1) was converted to a temporary 2-inch monitor well. Groundwater was encountered at approximately 78 feet below top of casing (TOC). On September

1910 N. Big Spring

22, 2006 and May 16, 2007, Highlander purged and sampled the well per OCD guidelines for analyses of chlorides and BTEX. On the September 22, 2006 sampling event, the chloride and BTEX concentrations did not exceed the New Mexico Water Quality Control Commission (NMWQCC) standards. On the May 16, 2007 sampling event, the hydrocarbon constituents (BTEX) were below the NMWQCC standards, however, the chloride exceeded the NMWQCC standard at 1220 mg/L. The analytical results are shown in Table 3.

This site is adjacent to the E.C. Hill B-D tank battery and both were assessed concurrently. A total of six (6) monitor wells have been installed at these adjoining tank batteries sites for delineation purposes, but have not yet been surveyed, gauged or sampled.

HYDROLOGY AND GROUNDWATER SEARCH

<u>Hydrology</u>

Groundwater in the Teague Field study area, southern Lea County, is obtained almost entirely from the Ogallala formation with some wells in the Quaternary alluvium. Sediments of Quaternary age can be observed in southern Lea County in the form of alluvial deposits, probably of both Pleistocene and Recent age, and dune sands of Recent age. The Quaternary alluvium has been deposited in topographically low areas where the older Ogallala formation had been stripped away.

The primary aquifer, the Ogallala formation, consists of inter-fingering bodies of fine to coarse sand, gravel, silt, and clay-material. In places, the upper part of the formation contains several hard, erosionally resistant beds of caliche. The thickness of the Ogallala formation is primarily controlled by the morphology of the eroded pre-Ogallala surface. To the east of the study area, in the San Simon Ridge area, the Ogallala has been stripped. To the west of the study area, in the Rattlesnake Ridge area, the base of the Ogallala is above the elevation of the water table.

Water in the Ogallala formation is unconfined and is contained in the pore spaces of unconsolidated or partly consolidated sediments. The saturated thickness of the Ogallala in the study area reportedly varies between 60 feet and 80 feet below ground surface (bgs). The altitude of the water table in the area is approximately 3,220 feet above mean sea level (MSL) and the average depth to groundwater in the area is approximately 80 feet to 120 feet below ground surface. Groundwater flow in the area of the Teague Field is generally towards the south-southeast.

The quality of groundwater in the area is generally fresh with a total dissolved solids being typically less than 1,000 ppm. Water from the Quaternary alluvium generally is high in silica (65 to 82 ppm), moderately high in calcium plus magnesium, low in sodium plus potassium, moderately low in sulfate and chloride. Uncontaminated water from the Ogallala formation is high in silica (49 to 73 ppm), contains moderate concentrations of calcium and magnesium. The water is generally hard.

The hydrogeologic data presented in this section was derived from Ground Water Report 6, "Geology and Ground Water Conditions in Southern Lea County, New Mexico," published by New Mexico Institute of Mining & Technology (1961).

Groundwater Search

According to the New Mexico State Engineer Office W.A.T.E.R.S. database, Average Depth to Water Report, water wells are located in Section 9, 16 and 32, Township 23 South, Range 37 East, with an average depth to water of 100', 115' and 106', respectively. Based on monitor wells installed at the Site the depth to groundwater at the Site is approximately 88.0' bgs.

SUBSURFACE SOIL ASSESSMENT

Auger Hole/Borehole Sampling

A total of seven auger holes have been installed at this facility. The majority of the TPH impact is limited to the surficial soils from 1.0' to 4.5' below ground surface (bgs), with the exception of AH-3. BH-1 was installed at AH-3 and showed TPH concentrations exceeded the RRAL to a depth of 40.0' bgs. No elevated chloride concentrations were observed during the sampling.

GROUNDWATER INVESTIGATION

Monitor Well Installation

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A total of six (6) monitor wells have been installed around the E.C. Hill #7 and E.C. Hill B-D tank batteries. The monitor wells were drilled using air/water rotary drilling techniques, and constructed according to EPA and NMOCD standards. The monitor wells were constructed using two (2) inch diameter schedule 40 PVC threaded casing and factory slotted screen. The monitor wells were drilled to depths of 90' to 98' bgs. Twenty (20) feet of 0.020 slotted screen was placed in each of the wells, with 15 feet of screen below the water table and 5 feet above.

The well screen was surrounded with a graded silica sand to a depth approximately 2-3 feet above the screen. A layer of bentonite pellets, approximately 3 feet thick was placed in the borehole above the sand. The remainder of the borehole was filled with cement and bentonite grout to about one (1) foot below ground. The monitor wells were completed with locking steel protectors, set in a concrete pad measuring approximately 3 feet by 3 feet. The monitor well completion details are shown in Appendix A.

Following installation, the wells were developed by hand bailing using a dedicated hand bailer to remove fine grained sediment, disturbed during drilling, and to ensure collection of representative groundwater samples. Water removed from the well was placed in a 55-gallon drum.

Quality Assurance/Quality Control

Groundwater samples were collected as soon as possible after the groundwater returned to its static level. Each well was inspected for the presence of phase-separated hydrocarbons (PSH). Groundwater samples were collected using clean disposable polyethylene bailers and disposable line. The samples were transferred into labeled and preserved containers provided by the laboratory. All of the samples were delivered under proper chain-of-custody control to Environmental Labs of

Texas, Inc., Odessa, Texas. The groundwater samples were analyzed for chloride by method 300.0, and Benzene, Toluene, Ethylbenzene, and Xylene (BTEX) by method EPA 8021B.

PROPOSED WORK PLAN FOR SOIL AND GROUNDWATER

Soil Remediation

Based upon the auger hole and borehole sample analyses, the impacted soils identified will be excavated to a depth of 1.0' to 4.5' bgs to remove the majority of soils above the TPH RRAL. A 1.0' clay barrier or 40 mil liner will be placed into the excavation in the area of AH-3/BH-1, at a depth of 4.5' bgs, to isolate the residual TPH impacted soils. The excavated soils will be taken to an approved disposal facility.

Groundwater Assessment

The five monitor wells installed since the initial monitor well placement have not yet been surveyed, gauged or sampled. The wells have been developed. In order to properly assess the delineation of the impacted groundwater, the wells will need to be surveyed and sampled. Once the data has been obtained and evaluated, an additional monitor well as required in the April 25, 2008, NMOCD letter will be installed with the screened interval placed entirely below the water table. If the sampling data indicate the necessity for additional monitor wells, they will be installed accordingly to complete delineation.

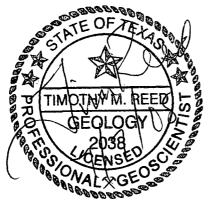
Annual Reporting

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An annual summary report will be prepared and submitted to the NMOCD, during the first quarter of each year, covering the previous year's activities. The report will summarize all activities conducted at the site, during that year. Additionally, the report will include conclusions and recommendations, if necessary, for system modifications, ongoing remediation and additional investigation, if deemed necessary.

If you have any question or comments concerning the assessment or the activities performed at the Site, please call me at (432) 682-4559.



cc: Larry Johnson - NMOCD, Hobbs, NM.

Respectfully submitted, Highlander Environmental Corp.

MM Timothy M. Reed, P.G.

Vice President

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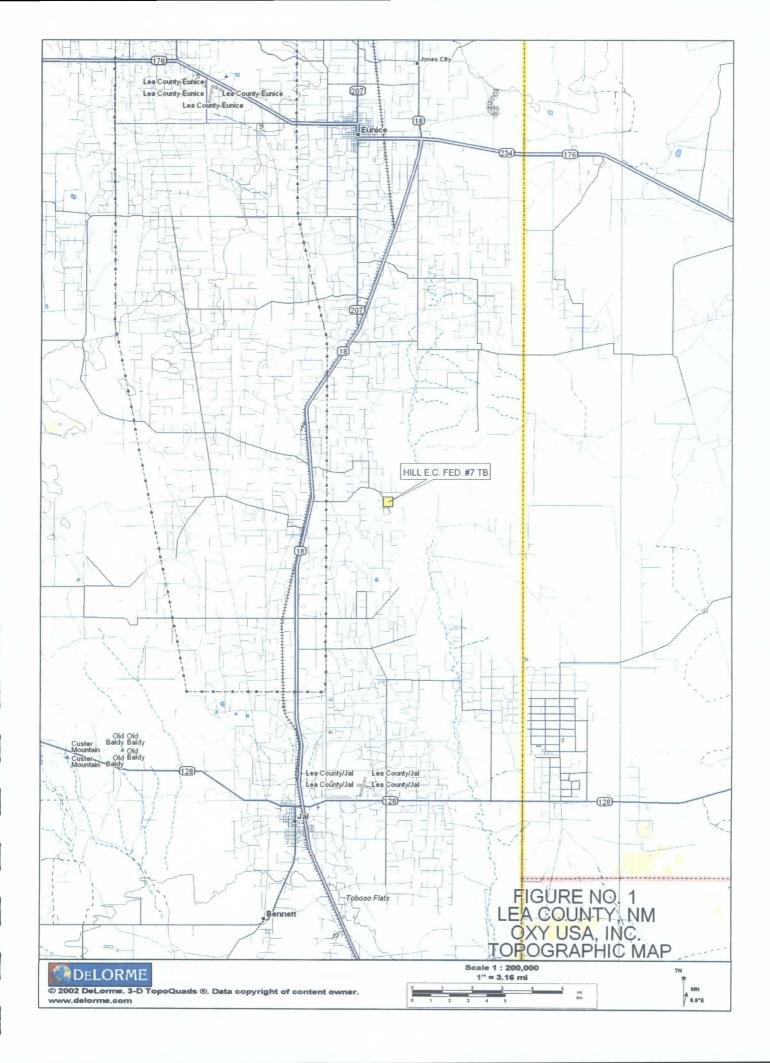
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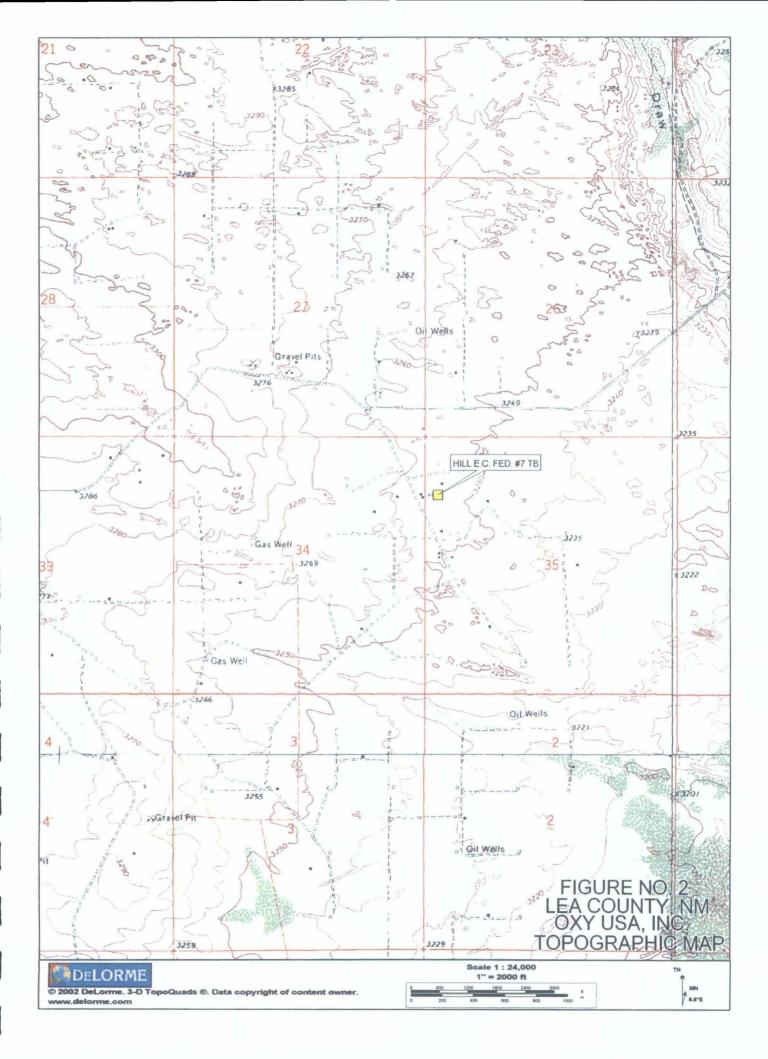
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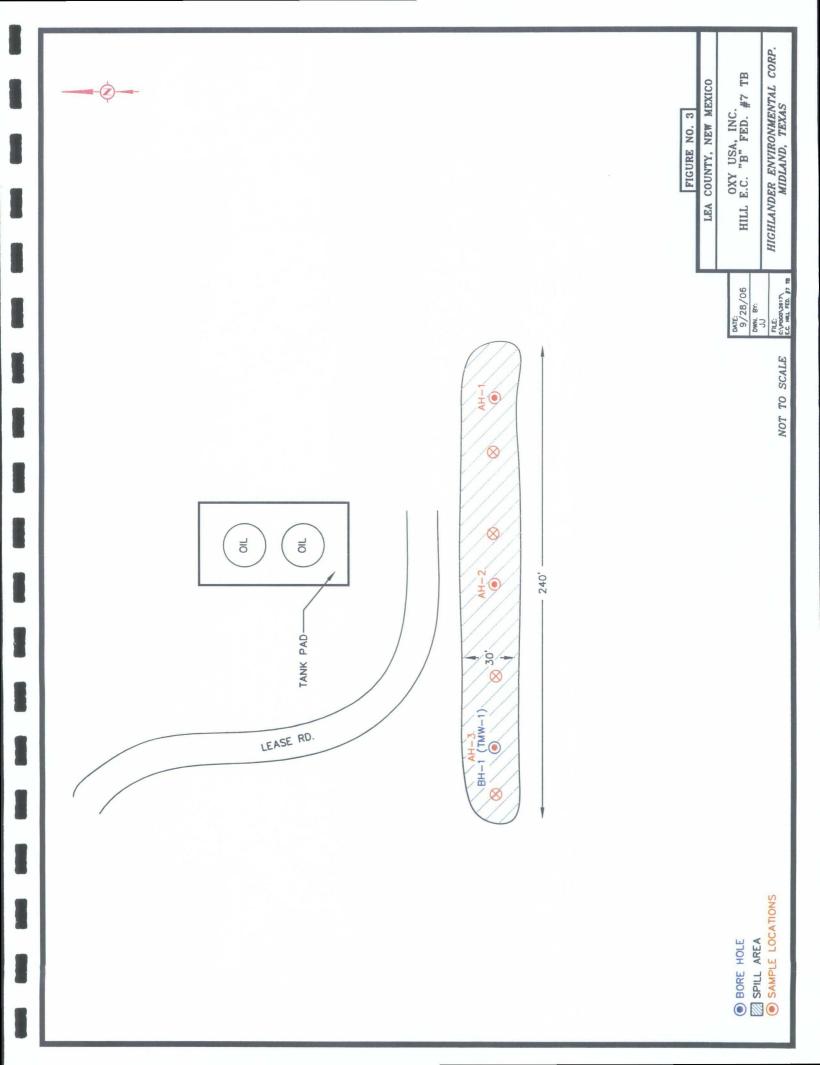
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Table 1Pogo Producing CompanyE.C. HILL B FEDERAL #7 TANK BATTERYLea County, New Mexico

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Sample	Sampled	Sample Depth (ft),	. C6-C12	TPH (mg/kg)	Total	Beuzene (mg/kg)	Toluene (mg/kg)	Ethlybenzene (mg/kg) [†]	Xylene (mg/kg)	Chloride (mg/kg)
AH-1	8/9/2006	0-1,	<20.0	2640	2640	<0.200	<0.200	<0.200	<0.200	<50.0
	8/9/2006	1-1.5'	<20.0	<50.0	<50.0	<0.200	<0.200	<0.200	<0.200	<50.0
	8/9/2006	2-2.5'	1.36	<50.0	1.36	1	1	a	-	<50.0
	8/9/2006	4-4.5'	<1.00	<50.0	<50.0	1	1	1	1	<50.0
AH-2	8/9/2006	0-1,	<20.0	2170	2170	<0.200	<0.200	<0.200	<0.200	<50.0
	8/9/2006	1-1.5'	<20.0	2440	2440	1	1	J	-	<50.0
	8/9/2006	2-2.5'	190	21700	21890	1	P	•	1	<50.0
	8/9/2006	4-4. <i>5</i> '	46.6	21800	21846.6	<0.200	<0.200	0.622	1.25	<50.0
	8/9/2006	6-6.5'	<20.0	241	241	1	1	-	r	<50.0
	8/9/2006	8-8.5'	<20.0	<50.0	<50.0	<0.200	<0.200	<0.200	<0.200	<50.0
AH-3	8/9/2006	0-1,	<20.0	358	358	<0.200	<0.200	<0.200	<0.200	<50.0
	8/9/2006	1-1.5'	<20.0	1580	1580	1	-	1	•	<50.0
	8/9/2006	2-2.5'	<20.0	1240	1240		1	I		<200
	8/9/2006	4-4.5'	<20.0	6080	6080	<0.200	<0.200	<0.200	<0.200	<200
	8/9/2006	6-6.5'	<20.0	1110	1110	-	-	4	1	<200
	8/9/2006	8-8.5'	<20.0	2240	2240	•		-	1	<50.0
	8/9/2006	10-10.5'	<20.0	12200	12200	<0.200	<0.200	<0.200	<0.200	<50.0

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(-) not analyzed

Table 1Pogo Producing CompanyE.C. HILL B FEDERAL #7 TANK BATTERYLea County, New Mexico

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Samples, 1	Date	Sample		PH (mg/kg)		Benzene	Toluëne	*Ethlybénzene	Xvlene	Chloride
\mathbf{D}	Sampled Depth (ft)	Depth (ft)	C6-C12	e6.C12 C12.C35 T0tal	Tôtal	(mg/kg)	(mg/kg)	(mg/kg)	- 4	(ing/kg).
AH-4	10/24/2007	0-1,	<1.00	<50.0	<50.0	•	-	1	•	8
	10/24/2007	2-2.5'	<1.00	<50.0	<50.0	,	-	1	-	1
AH-5	10/24/2007	0-1'	<1.00	3370	3370	1	-	T	-	
	10/24/2007	2-2.5'	<1.00	<50.0	<50.0	1	-	1	-	1
AH-6	10/24/2007	0-1'	<1.00	1280	1280		-	1	-	່ວ່
	10/24/2007	2-2.5'	<1.00	1660	1660	,	-	-	-	4
	10/24/2007	4-4.5'	2.15	6850	6852.15	•	-	4	-	1
	10/24/2007	6-6.5'	<1.00	114	114	,	-		-	9
	10/24/2007	8-8.5'	<10.0	<50.0	<50.0	1	-	-	-	-
AH-7	10/24/2007	0-1,	<1.00	<50.0	<50.0	,	•	1	•	
	10/24/2007	2-2.5'	<1.00	<50.0	<50.0	•	-	T	-	1
	10/24/2007	4-4.5'	<1.00	1230	1230	١	1	B	-	1
	10/24/2007	6-6.5'	3.04	169	172.04	•	-	ł	•	1
	10/24/2007	8-8.5'	6.24	87.70	93.94	1	_	-	-	1
	10/24/2007	10-10.5'	19.80	762	781.80	•		¢	~	J

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Table 2Pogo Producing CompanyE.C. HILL B FEDERAL #7 TANK BATTERYLea County, New Mexico

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Chloride	(mg/kg)		'	ľ				1	
Xylene	(mg/kg)		-	0.512	1	I	-		
Ethlybenzene	ation (mg/kg)		•	<0.200	1		-	1	
Toluene	(mg/kg)		,	<0.200		3	-	-	
	(mg/kg)		-	<0.200	-	-	-	1	
	Total		5346	8884	11074.4	3770	3030	165	
🖓 TPH (mg/kg)	2 C12-C35		5290	8820	11000	3770	3030	165	
1	C6-C12		56.0	64.4	74.4	<20.0	<20.0	<20.0	
Sample .	(Depth (ft)		10-12'	15-17'	20-22'	30-32'	40-42'	50-52'	
· Date	Sampled		9/12/2006	9/12/2006	9/12/2006	9/12/2006	9/12/2006	9/12/2006	
Sample	D		BH-1						

(-) not analyzed

Table 3Pogo Producing CompanyE.C. HILL B FEDERAL #7 TANK BATTERYLea County, New Mexico

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Chloride (mg/L)	<2.00	1220	
(mg/L)	0.0019	<0.00100	
Ethlybenzene (mg/L) ?	<0.00100	<0.00100	
Benzene [<0.00100	<0.00100	
Benzene	<0.00100	<0.00100	
Total	-	•	
TPH (mg/kg	-	P	
C6-C12		Ø	
Sample	104309	1	
Date	9/22/2006	5/16/2007	
Sample ID	TMW-1		

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APPENDIX A

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Water Well Data Average Depth to Groundwater (ft) Hill E.C. B-D 17 Tank Battery and Hill E.C. B Federal #7, Lea County, New Mexico

	22	South	36	6 East	
6	5	4	3	2	1
195	212				137
7	8	9	10	11	12
18	17	16	15	14	13
		170			
19	20	21	22	23	24
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30	29	28	27	26	25
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31	32	33	34	35 181	36
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18 190	17	16	15 125	14 65	13
19	20	21 65	22	23	24 60
30	29	28	27 53	26 65	25
31	32	33	34	35	36

22 So	uth 38	East
6	5	4
7	8	9
18	17	16
19	20	21
30	29	28
31	32	33

	23 Sc	outh	36	East	
6	5	4	3	2	1
		160			
7	8	9	10	11	12
18	17	16	15	14	13
		220	149		
19	20	21	22	23	24
			400	143	
30	29	28	27	26	25
31	32	33	34	35	36 127
189					

	24	South	3	86 East	
6	5	4	3	2	1
		165			
7	8	9	10	11	12
18	17	16	15	14	13
			312		
19	20	21	22	23	24
				160	
30	29	28	27	26	25
31	32	33 54	34	35	36
		53			

	23 S	outh		37	Ea	st	
6 102	5	4	3	70	2	64	1
7	8	9 100	10 66		11 68		12
18	17	16 115 100	15		14		13
19	20 108	21	22		23		24
30	29	28 117	27 88		26		25
31	32106 97	33 87	34		35		36

23	South	38	East

6	5	4
7	8	9
18	17	16
19	20	21
30	29	28
31	32	33

	24 \$	South	3	7 Ea	ıst		
6	5 111	4	3	2		1	
7	8	9	10	11	64	12	18
119	90		120				
18	17	16	15	14		13	
124		67				1_	
19	20	21	22	23	94	24	
		69				100	
30	29	28	27 41	1 26		25 8	89
		70				90	
31	32	33	34	35		36	
			55		1		

24	South	38	East
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6	5	4
7	8	9
18	17	16
19	20	21
56		
30 68	29	28
30 31		
31	32	33
97		

88 New Mexico State Engineers Well Reports

105 USGS Well Reports

90 Geology and Groundwater Conditions in Southern Lea, County, NM (Report 6) Geology and Groundwater Resources of Eddy County, NM (Report 3)

34 NMOCD - Groundwater Data

APPENDIX B

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Boring/Well:	MW-1
Project Number:	2617
Client:	Pogo Production Inc.
Site Location:	Hill Federal #7 Tank Battery
Location:	Lea County, New Mexico
Total Depth	93
Date Installed:	09/21/06

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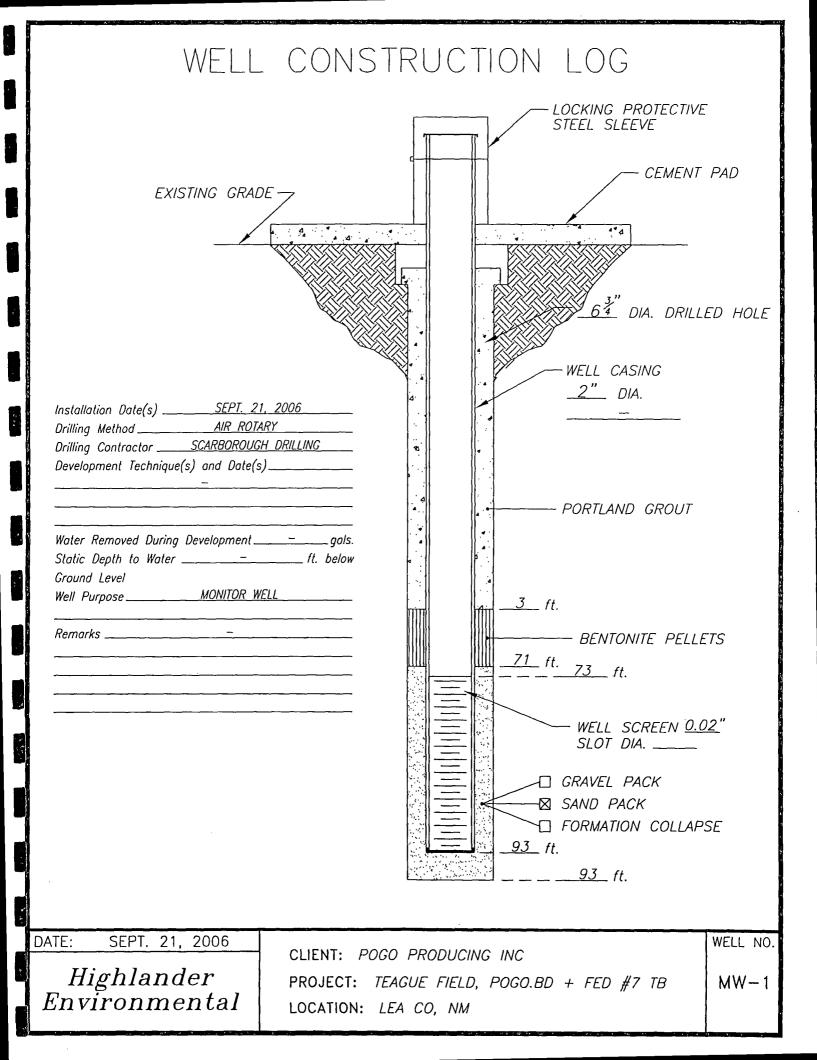
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DEPTH (Ft)	OVM	SAMPLE DESCRIPTION
0-5		Dark brown silty sand
5-6		Black silty sand
6-10		Black and gray silty sand
10-15		Gray silty sand
15-20		Tan/gray silty fine grain sand
20-25		Tan/brown silty fine grain sand
25-30		Tan/brown silty fine grain sand
30-35		Tan/brown silty fine grain sand with hard stringer
35-40		Tan/reddish tan very fine grain sand
40-55		Tan sand with sandstone
55-65		Tan sand with sandstone
65-70		Tan/gray silty fine grain sand
70-75		Tan silty very fine grain sand
75-93		Tan silty very fine grain sand

Total Depth is 93 feet

Groundwater encountered at 78 feet below ground surface.



Boring/Well:	MW-2
Project Number:	2617
Client:	Pogo Production Inc.
Site Location:	BD and Tank Battery Federal #7
Location:	Lea County, New Mexico
Total Depth	90
Date Installed:	12/04/07

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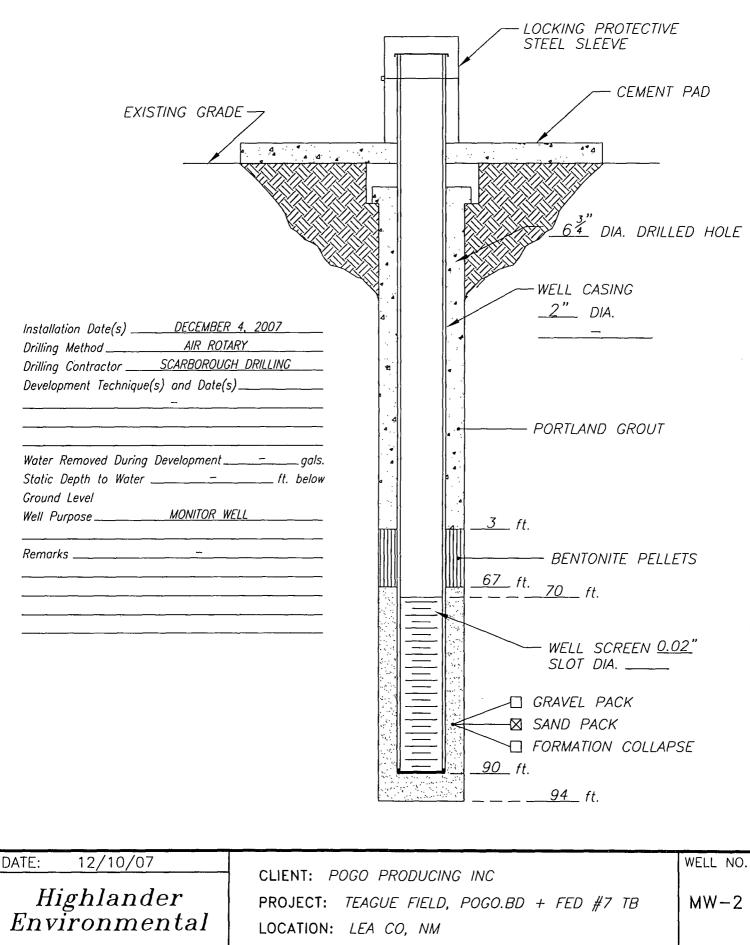
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DEPTH (Ft)	OVM	SAMPLE DESCRIPTION
0-5		Tan fine grain sand
5-10	·	Tan fine grain sand
10-15		White limestone with sand intermixed
15-20		White limestone with sand intermixed
20-25		Tan fine grain sand (loose sugar sand)
25-30		Tan fine grain sand (loose sugar sand)
30-35		Tan fine grain sand (loose sugar sand)
35-40		Tan fine grain sand (loose sugar sand)
40-45		Tan fine grain sand (loose sugar sand)
45-50		Tan fine grain sand with some sandstone intermixed
50-55	·	Tan fine grain sand with some white limestone
55-60		Tan fine grain sand with some white limestone
60-65		Tan fine grain sand with sandstone intermixed (loose)
65-70		Tan fine grain sand with sandstone intermixed (loose)
70-75		Tan fine grain sand with sandstone intermixed (loose)
75-80		Tan fine grain sand with sandstone intermixed (loose)
80-85		Tan fine grain sand with sandstone intermixed (loose)
85-90		Tan fine grain sand with sandstone intermixed (loose)

Total Depth is 90 feet

Groundwater encountered at 80 feet below ground surface.

WELL CONSTRUCTION LOG



Boring/Well:MW-3Project Number:2617Client:Pogo Production Inc.Site Location:BD and Tank Battery Federal #7Location:Lea County, New MexicoTotal Depth90Date Installed:12/04/07

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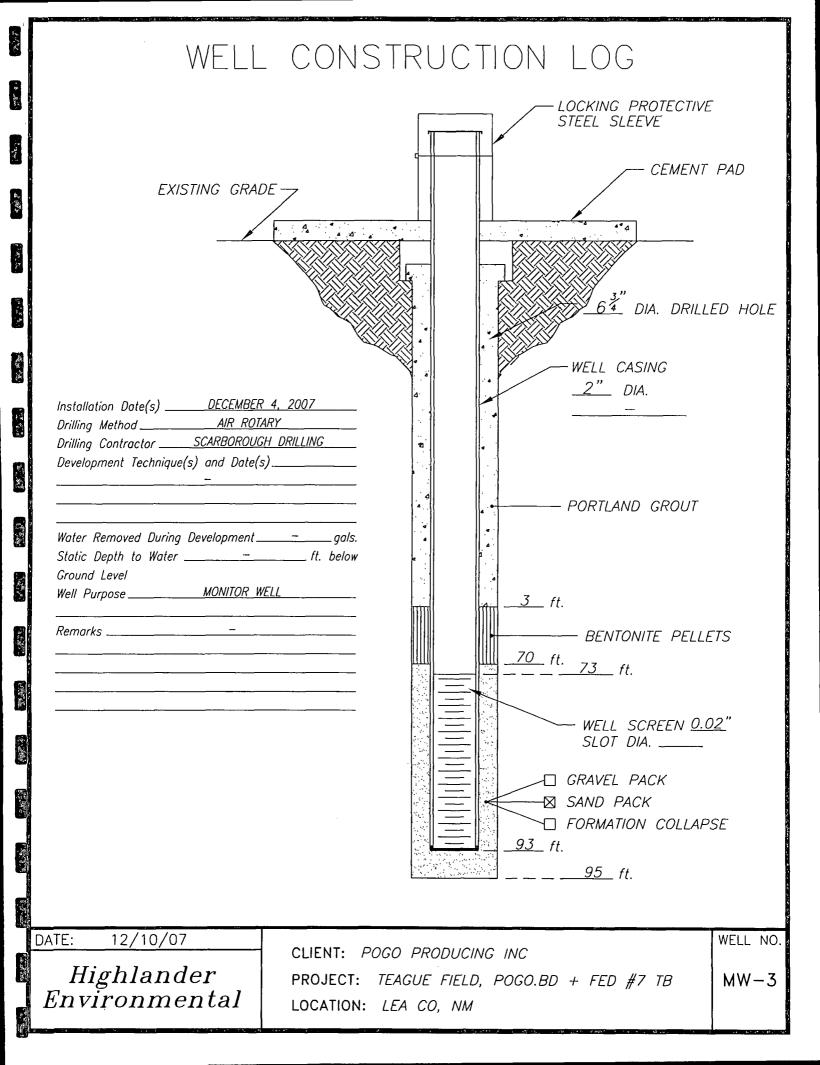
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DEPTH (Ft)	OVM	SAMPLE DESCRIPTION
0-5		Brown fine to medium grain sand
5-10		White limestone with fine grain sand (loose)
10-15		Tan fine grain sand (blow sand, loose)
15-20		Tan fine grain sand (blow sand, loose)
20-25		Tan fine grain sand (blow sand, loose)
25-30		Tan fine grain sand (blow sand, loose)
30-35		Tan fine grain reddish sand
35-40		Tan fine grain reddish sand
40-45		Tan fine grain reddish sand
45-50		Tan fine grain reddish sand
50-55		Light tan/white sand with limestone intermixed with some sandstone
55-60		Light tan/white sand with limestone intermixed with some sandstone
60-65		Tan sand with some gravel and sandstone intermixed
65-70		Tan sand with some gravel and sandstone intermixed
70-75		Tan sand with some gravel and sandstone intermixed
75-80		Tan sand with some gravel and sandstone intermixed
80-85		Tan sand with some gravel and sandstone intermixed
85-90		Tan sand with some gravel and sandstone intermixed
90-95		Tan sand with some gravel and sandstone intermixed

Total Depth is 95 feet

Groundwater encountered at 80 feet below ground surface.



Boring/Well:MW-4Project Number:2617Client:Pogo Production Inc.Site Location:BD and Tank Battery Federal #7Location:Lea County, New MexicoTotal Depth95Date Installed:12/05/07

DEPTH (Ft)	OVM	SAMPLE DESCRIPTION
0-5		Tan/brown well sorted medium grain sand
5-10		Tan/brown well sorted medium grain sand
10-15		Buff fine grain calcareous sand
15-20		Tan/buff slightly calcareous medium grain sand
20-25		Tan/brown well sorted medium grain sand
25-30		Tan/brown medium grain sand (beach sand)
30-35		Tan/brown medium grain sand (beach sand)
35-40		Tan/brown medium grain sand intermixed with some limestone
40-45		Tan medium grain sand with some limestone intermixed
45-50		Tan medium grain sand with some limestone intermixed
50-55		Tan fine grain well sorted sand
55-60		Tan fine grain well sorted sand
60-65		Tan fine grain well sorted sand
65-70		Tan fine grain well sorted sand
70-75		Tan fine grain well sorted sand
75-80		Tan fine grain well sorted sand
80-85		Tan fine grain well sorted sand
85-90		Tan fine grain well sorted sand
90-95		Tan fine grain well sorted sand

Total Depth is 95 feet

Groundwater encountered at 85 feet below ground surface.

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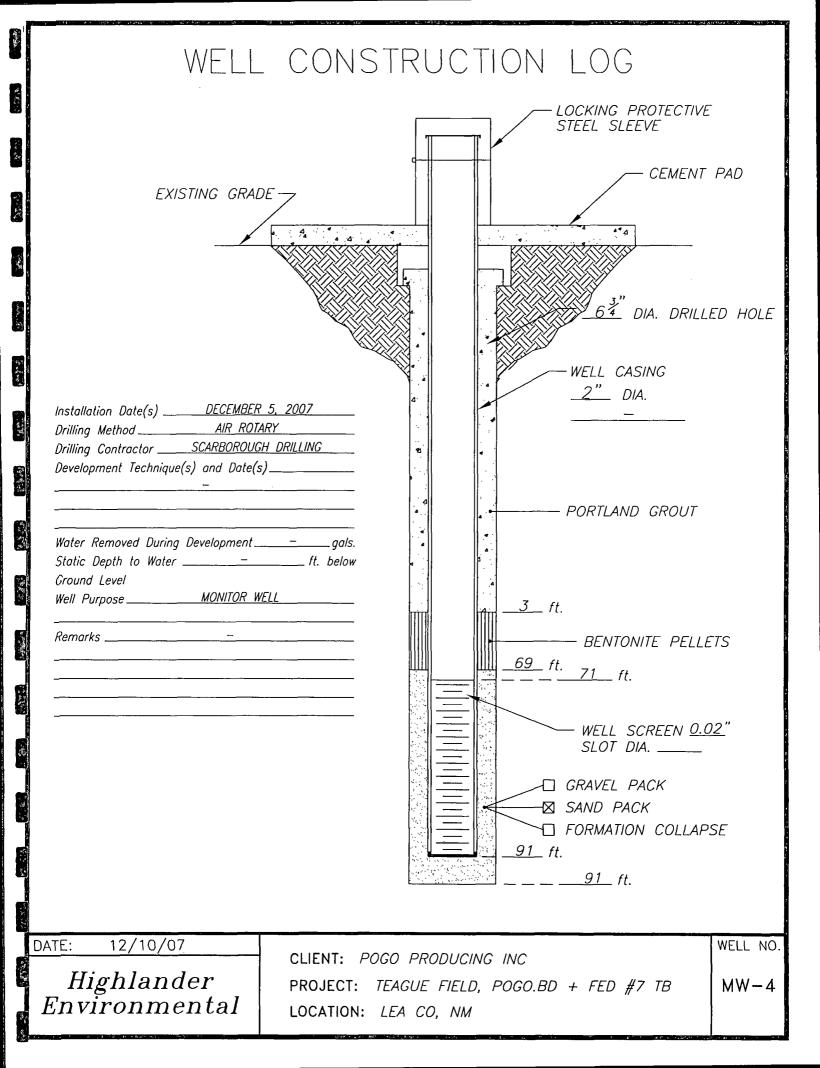
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Boring/Well:MW-5Project Number:2617Client:Pogo Production Inc.Site Location:BD and Tank Battery Federal #7Location:Lea County, New MexicoTotal Depth92.5Date Installed:12/05/07

DEPTH (Ft)	OVM	SAMPLE DESCRIPTION
0-5		Tan/brown well sorted medium grain sand
5-10		Tan/brown well sorted medium grain sand
10-15		Buff fine grain sandy limestone
15-20		Tan/buff medium grain sand
20-25		Tan medium grain calcareous sand
25-30		Tan/brown medium grain sand (beach sand)
30-35		Tan/brown medium grain sand (beach sand)
35-40		Tan/brown medium grain sand (beach sand)
40-45		Tan/brown medium grain sand (beach sand)
45-50		Tan/brown medium grain sand with limestone intermixed
50-55		Tan/brown medium grain sand
55-60		Tan/brown medium grain sand (beach sand)
60-65		Tan/brown medium grain sand (beach sand)
65-70		Tan/brown medium grain sand (beach sand)
70-75		Tan/brown medium grain sand (beach sand)
75-80		Tan/brown medium grain sand (beach sand)
80-85		Tan/brown medium grain sand (beach sand)
85-90		Tan/brown medium grain sand (beach sand)
90-95		Tan/brown medium grain sand (beach sand)

Total Depth is 95 feet

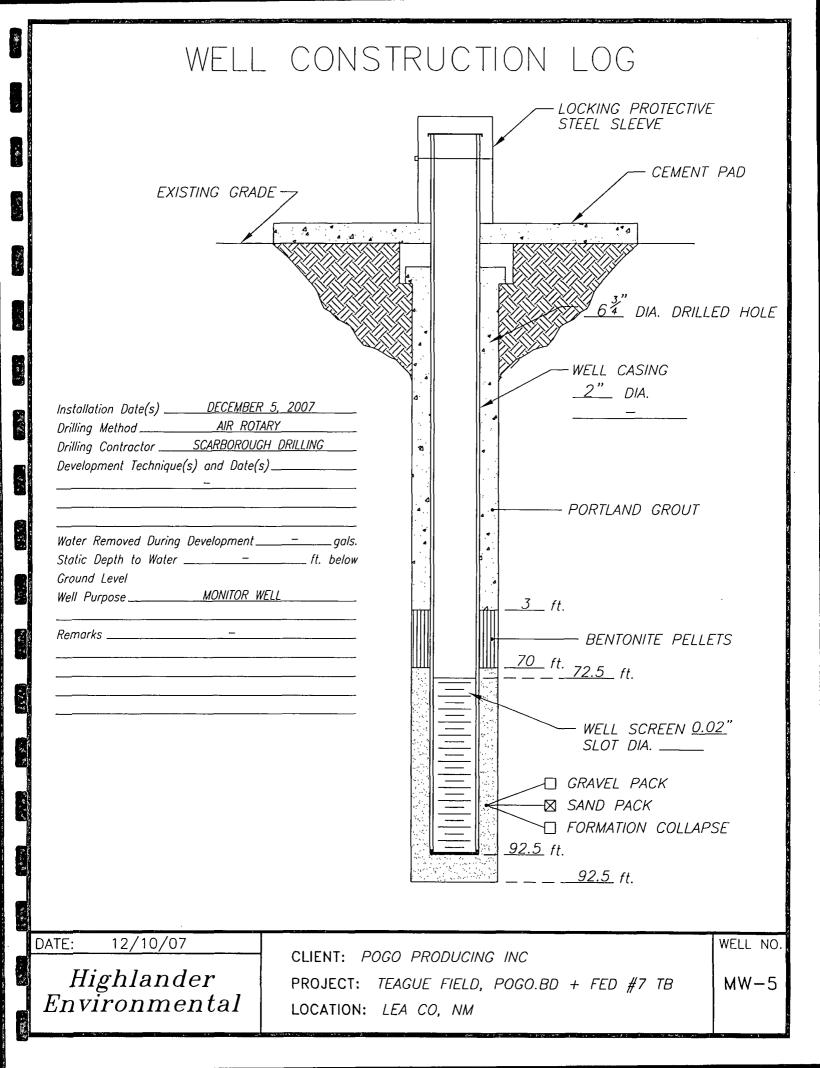
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Groundwater encountered at 83 feet below ground surface.



Boring/Well:	MW-6
Project Number:	2617
Client:	Pogo Production Inc.
Site Location:	BD and Tank Battery Federal #7
Location:	Lea County, New Mexico
Total Depth	93
Date Installed:	12/11/07

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DEPTH (Ft)	OVM	SAMPLE DESCRIPTION
0-5		Tan/brown fine to medium grain sand
5-10		Brown medium grain sand
10-15		Buff/tan calcareous sand (50/50)
15-20		Tan/buff calcareous sand (60S/40L)
20-25		Buff/tan calcareous sand (50/50)
25-30		Tan fine grain sand (beach sand)
30-35		Tan fine grain sand (beach sand)
35-40		Tan fine grain sand (beach sand)
40-45		Tan fine grain sand (beach sand)
45-50		Buff/tan calcareous sand (60S/40L)
50-55		Buff/tan calcareous sand (60S/40L)
55-60		Buff/tan calcareous sand (60S/40L)
60-65		Buff/tan calcareous sand with sandstone intermixed
65-70		Buff/tan calcareous sand with sandstone intermixed
70-75		Tan/brown to buff calcareous sand
75-80		Yellow calcareous medium grain sand
80-85		Tan fine grain sand
85-90		Tan fine grain sand
90-95		Tan fine grain sand

Total Depth is 95 feet

Groundwater encountered at 86 feet below ground surface.

