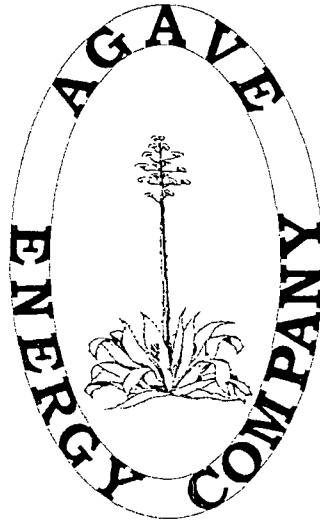


GW - 123

**GENERAL
CORRESPONDENCE**

2008 - 2010



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SITE WORK PLAN
Seven Rivers Compressor Station GW-123
25 T19S R24E
EDDY COUNTY, NEW MEXICO

June 4, 2008

Seven Rivers Compressor Station
Agave Energy Company
June 4, 2008

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Seven Rivers Compressor Station
Agave Energy Company
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1.0 INTRODUCTION

This work plan for the Seven Rivers Compressor Station been developed to comply with Section 11 of GW-123, Groundwater Discharge Plan for the Yates Petroleum Corporation Seven Rivers Compressor Station. This plan is based on initial reporting, visual observation, and regulations and Guidelines of the OCD.

2.0 BACKGROUND

Agave Energy Company (Agave) is the operator of the Seven Rivers Compressor Station. As part of the normal operation and maintenance of such a facility, Agave is proposing to remove and update a large part of the existing sump system covered by GW-123. Agave will replace existing below-grade sumps and some of the associated drainage lines with a new, above-ground system. The new system will be composed of an above-ground tank referred to as a "blow case". There will be a slight elevation difference between the compressor skid and the blow case so that spills, leaks or cleanup material from the skid will drain to the blow case for routing to the oily wastewater tank. After washing or draining the skid, the blow case tank is closed and pressurized. The pressure "pushes" the oily wastewater to the oily wastewater tank where it is disposed of properly. Spills and leaks will not remain in the blow case, but will be quickly routed to the oily wastewater tank.

As part of the current discharge permit (GW-123), all "below grade tanks, sumps, and pits must be approved prior to installation or upon modification and must incorporate secondary containment and leak detection into the design."

The new blow case will be on its own concrete skid so any leaks will be readily apparent. All lines that are considered part of the sump system will be above ground. The new sump system will be designed to be pressure tested annually as well as undergo an annual visual inspection. Visual observation during normal facility operations will also be enhanced.

3.0 RECOMMENDED REMEDIAL ACTION LEVELS

The ranking criteria for this site is as follows (per Section IV of the Guidelines)

Depth to ground water >100' (per NM Office of the State Engineer)	0
Not in a wellhead protection area	0
Distance to surface body water <1000'	0
TOTAL RANKING SCORE =	0

For sites with a Total Ranking Score of 0, the Recommended Remedial Action Levels (RRAL) are:

Benzene	10 ppm
BTEX	50 ppm
TPH	5000 ppm

4.0 REMEDIAL ACTION PLAN

Agave will implement the following actions for this site:

1. Agave will remove all sumps and some of the sump lines. Some of the sump lines can be reused either as is or in a new location. Representative soil samples will be taken from each excavation at the site. At least one sample will be taken below each sump and below any mid-run joints or junctions of any extended sump line runs.
2. If the soil samples are below the RRAL levels, the excavations will be backfilled.
3. If the soil samples are not below the RRAL Agave will excavate additional soil and resample the area until the RRAL are met. If excavation to a depth of 5 feet below the bottom of the sump or sump line has not achieved a sample meeting the RRAL, Agave will contact the OCD District Office, and if needed submit a revised remedial action plan.
4. Contaminated soils exceeding RRAL will be disposed of at an OCD approved land farm or landfill facility.

Seven Rivers Compressor Station

Agave Energy Company

June 4, 2008

If you have any questions regarding this information, please do not hesitate to call me at 575-748-4471 or email me at jknowlton@ypcnm.com

Respectfully Submitted,

A handwritten signature in cursive script that reads "Jennifer Knowlton".

Jennifer Knowlton
Environmental Engineer