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VIA ELECTRONIC SUBMITTAL

September 15, 2017

Randy Bayliss, PE - Hydrologist, District III
New Mexico Oil Conservation Division
Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

RE: Groundwater Monitoring Plan
3RP-238 Standard Oil Com #1

Mr. Bayliss:

As a follow-up to our meeting on August 15, 2017, and on behalf of El Paso CGP Company, LLC (EPCGPC), Stantec Consulting Services Inc. (Stantec) has prepared this work plan for continued semi-annual groundwater sampling and monitoring at the above-referenced site (Site). As discussed during the August 15, 2017, meeting, EPCGPC believes information from a Burlington Resources release at this location should be reviewed before determining what, if any, additional work may be required of EPCGPC. It is EPCGPC's understanding that the New Mexico Oil Conservation Division's (NMOCD's) is searching their records and/or requesting additional information from Burlington Resources regarding the status of their release.

EPCGPC proposes to continue semi-annual groundwater sampling and monitoring at the Site, beginning with the next sampling event planned for November 2017. EPCGPC monitoring wells at the Site will be gauged for liquid level measurements, and selected monitoring wells (MW-1, MW-2, MW-7, MW-9, MW-15 and MW-16), if not containing measureable light non-aqueous phase liquid (LNAPL), will be sampled with HydraSleeves. The collected groundwater samples, and one trip blank, will be submitted for laboratory analysis of benzene, toluene, ethylbenzene, and xylenes (BTEX) using United States Environmental Protection Agency (USEPA) Method 8021B. New HydraSleeves will be deployed in the sampled monitoring wells for use during the subsequent semi-annual groundwater monitoring and sampling event.

The results of the calendar year semi-annual groundwater sampling and monitoring events will be presented in an annual report for submittal to the NMOCD in the first calendar quarter of the subsequent year. In addition to summarizing site activities for the year, the report will include a tabular summary of the groundwater sampling and monitoring results, updated site maps depicting the groundwater sample results, locations of wells containing measureable LNAPL, and groundwater elevations, laboratory analytical reports, waste disposal documentation, and other pertinent information.



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Mr. Randy Bayliss

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Reference: Groundwater Monitoring Plan

Please feel free to contact Joseph Wiley, of EPCGP, at (713) 420-3475, or me, if you have any questions or require additional information.

Sincerely,

Stantec Consulting Services Inc.

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Cc: Cory Smith, Vanessa Fields, NMOCD District 3
Joseph Wiley, EPCGP