



**CONESTOGA-ROVERS
& ASSOCIATES**

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June 25, 2015

Reference No. 088210-14

Ms. Kellie Jones
Environmental Specialist, District 1
Oil Conservation Division, EMNRD
1625 N. French Dr
Hobbs, New Mexico 88240

RECEIVED

By OCD District 1 at 7:41 am, Jun 29, 2015

APPROVED ; Conditional

By OCD District 1 at 7:41 am, Jun 29, 2015

Dear Ms. Jones:

1. Ensure BLM approval/concurrence.

Re: Work Plan
Falcon Federal 25 #2H
RP# 1RP-3686
Unit M, Section 24, Township 24-S, Range 33-E
Latitude: N 32.1820, Longitude: W 103.5312
Lea County, New Mexico

On behalf of EOG Resources, Inc. (EOG), Conestoga-Rovers and Associates (CRA) is pleased to present this work plan to the New Mexico Oil Conservation Division (NMOCD). This work plan presents our proposed approach to restoration activities for a flow line release that occurred at the above referenced well site location on June 22, 2015.

1.0 Project Information

The Falcon Federal 25 #2H site (hereafter referred to as the "Site"), is an active well location situated approximately 20 miles northwest of Jal in Lea County, New Mexico (see **Figure 1**). It is located in Unit M, Section 24, Township 24 South, Range 33 East. According to EOG personnel, a release of approximately 20 barrels of produced water occurred due to a ruptured seam on a polyethylene flow line. Upon discovery, the line was repaired. No fluids were able to be recovered. A C-141 was submitted to the NMOCD and remediation permit number 1RP-3686 was assigned.

CRA mobilized a field technician to the Site to perform an initial soil sampling event to assess the horizontal and vertical extent of the release. Three soil samples were collected from depths ranging from one to 1.5 feet below ground surface (bgs). Hand auger refusal was encountered at those depths. Samples were sent to Xenco Laboratories of Odessa, Texas for laboratory analysis of benzene, toluene, ethyl benzene, and xylenes (BTEX), total petroleum hydrocarbons (TPH), and chloride. Analytical results are pending laboratory analysis.

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June 25, 2015

Reference No. 088210-14

- 2 -

Based on information available from the Petroleum Recovery Research Center Pit Rule Mapping Portal, the depth to groundwater at the Site is most likely between 50 and 99 feet bgs. Additionally, there are no well head protection areas or surface water bodies within 1,000 feet of the Site. Therefore, the preliminary ranking score is 10.

Based on this score, the Site-specific Recommended Remediation Action Limits (RRALs) to be applied by the NMOCD are 10 milligrams per kilogram (mg/kg) for benzene; 50 mg/kg for total BTEX; 1,000 mg/kg for TPH and 250 mg/kg for chlorides.

2.0 Scope of Work

The scope of work for this project will involve the excavation of impacted soil accompanied by soil sample analysis. Field screening of soils will be performed to guide excavation activities. Subsequently, the excavation will be backfilled with clean soil, fertilized, and seeded. The following outlines basic project details that will be completed by CRA and EOG subcontractors:

Field Program

The field program will consist of the following:

- The impacted area has been estimated to be approximately 530 feet long with varying widths (see **Figure 2**). Impacted soil in the affected area will be excavated until field screening indicates that the soil is below the RRALs. Contaminated soil will be disposed of at the Sundance/Parabo facility, in Eunice, New Mexico;
- Soils will be field screened for organic vapors using a calibrated photoionization detector and the heated headspace method. Soils will be field screened for chloride during excavation by mixing soil samples with de-ionized water. The rinsate will be analyzed using Hach chloride test strips. If field screening indicates that soils are below RRALs, excavation would halt to minimize excavating clean soil; and
- The excavation will be backfilled to grade using clean fill material. The disturbed area will be fertilized and reseeded with a BLM approved seed mix.



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June 25, 2015

Reference No. 088210-14

- 3 -

Health and Safety Considerations

Personal protective equipment, including fire-retardant clothing, steel-toed work boots, gloves, safety glasses, and hard hats will be required during all field tasks. The project health and safety plan will be maintained on Site and will be reviewed and signed by on Site personnel, subcontractors, and authorized visitors.

Quality Assurance/ Quality Control

Confirmation soil sampling will be completed in accordance with our standard Quality Assurance/ Quality Control procedures designed to minimize cross-contamination between samples and to provide reliable laboratory results.

Reporting

A short letter report summarizing remediation activities will be submitted. The letter report will include a Site description, project history, description of field events, a discussion of results, and recommendations (if any). The report will include:

- A scaled Site plan showing the locations of the excavation and other Site features;
- Tabulation of field screening and laboratory analytical results;
- Copies of landfill manifests; and
- Geotagged photographic documentation of field activities.



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June 25, 2015

Reference No. 088210-14

- 4 -

3.0 Work Plan Approval Request

CRA is prepared to initiate the scope of work immediately. If you have any questions or comments with regards to this work plan, please do not hesitate to contact our Albuquerque office at (505) 884-0672. Your timely response to this correspondence is appreciated.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Cale Kanack
Staff Scientist

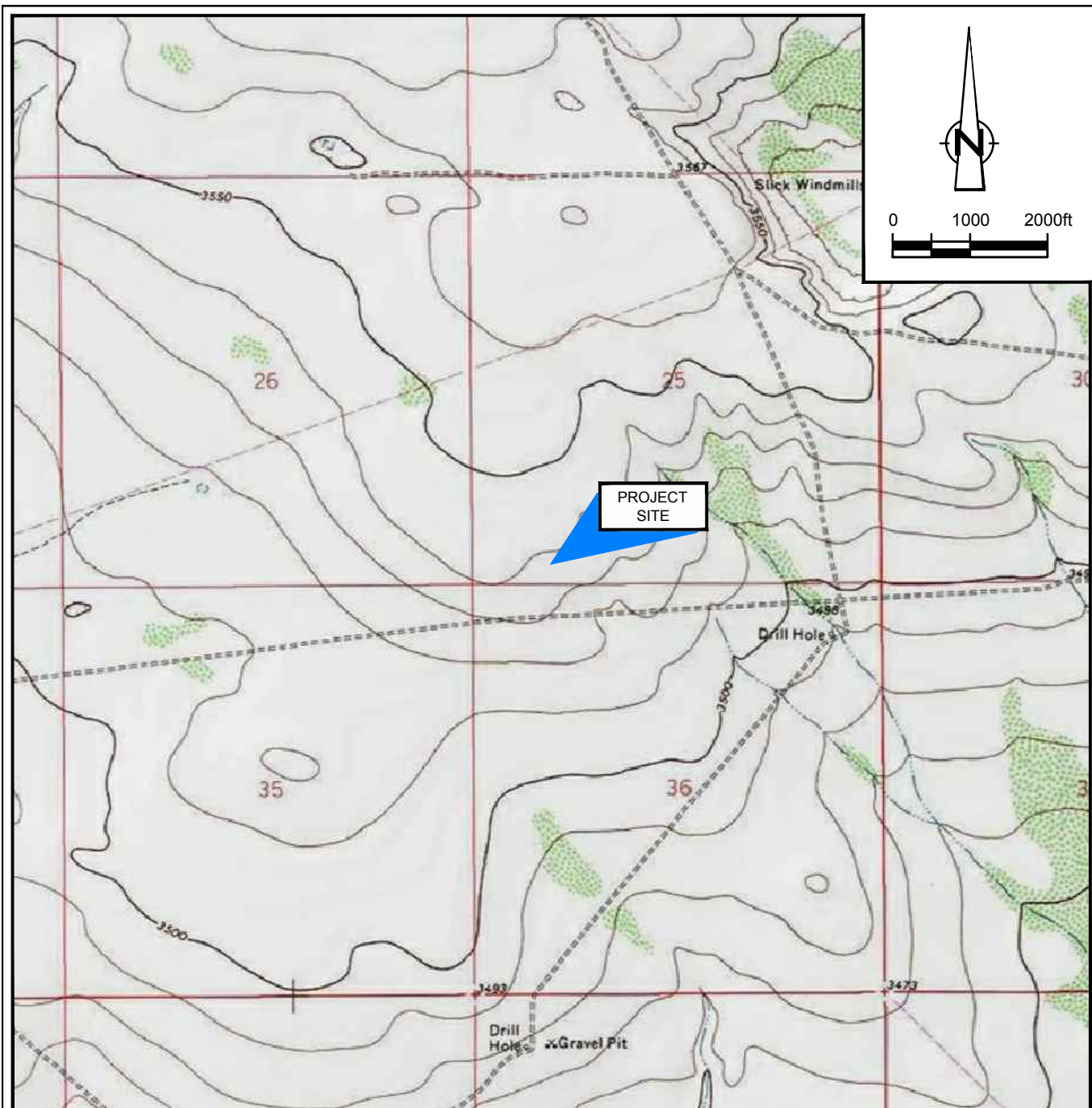
Bernard Bockisch, PMP
Senior Project Manager

CK/mc/1
Encl. (2)

Enclosures:

- Figure 1 - Site Location Map
- Figure 2 - Site Detail Map

Figures



SOURCE: USGS 7.5 MINUTE QUAD
"BELL LAKE, NEW MEXICO"

LAT/LONG: 32.1820° NORTH, 103.5312° WEST
COORDINATE: NAD83 DATUM, U.S. FOOT
STATE PLANE ZONE - NEW MEXICO EAST

Figure 1
SITE LOCATION MAP
FALCON FEDERAL 25 #2H
LEA COUNTY, NEW MEXICO
EOG Resources



