

Bratcher, Mike, EMNRD

From: Price, Henryetta <hprice@blm.gov>
Sent: Monday, June 12, 2017 12:05 PM
To: n.larson@sweattconstruction.com; buddy_delong@msn.com
Cc: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD
Subject: Re: FW: W J Sweatt * Sun Federal #1 * 30-015-05711

Good Morning Nancy,

Hoping you can get me an update on this location. It's been about 2 weeks since we got any feedback. I'd like to get it resolved soon. Thanks.

Henryetta Price

Environmental Protection Specialist
Bureau Of Land Management

[Hprice@blm.gov](mailto:hprice@blm.gov)

Phone 575-234-5951

Cell 575-706-2780

Fax 575-234-5927

*Please remember that Lesser Prairie Chicken timing stipulations are in effect 01 Mar- 15 June Annually

* Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.

On Fri, May 26, 2017 at 4:53 PM, Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us> wrote:

Hello Nancy,

I am writing to you on behalf of the Oil Conservation Division (OCD) of the State of New Mexico regarding W J Sweatt production operations of Sun Federal #1. Mike Bratcher and myself are the Environmental Specialists that work out of the OCD office here in Artesia, NM. This site is on federal land and involves federal minerals that are both managed by the Bureau of Land Management (BLM) so I have also included Henryetta Price who works out of the BLM Carlsbad Office as an Environmental Protection Specialist. I was told that instead of Buddy Delong you may be a better person to contact regarding W J Sweatt production sites. If you are the correct person to deal with this matter could you please address the email below that was originally sent to Buddy Delong (the original attachments have been affixed). If you are not the proper person to address this matter could you direct us to someone who is?

Thank you,

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1st Street

Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

Fax: 575-748-9720

From: Weaver, Crystal, EMNRD

Sent: Tuesday, May 23, 2017 11:09 AM

To: buddy_delong@msn.com

Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; 'Price, Henryetta' <hprice@blm.gov>; Jim Amos
(jamos@blm.gov) <jamos@blm.gov>

Subject: W J Sweatt * Sun Federal #1 * 30-015-05711

Hello Buddy,

First off OCD would like to concur with the BLM on this site.

A C-144 needs to be filled out regarding the unpermitted disposal pit and a remediation proposal for the pit needs to be turned in to the OCD no later than 6/2/17. A full delineation of this site will be required so please make sure to include that within your remediation proposal.

On the C-144 the first section on page one looks similar to this:

Type of action:

- *Below grade tank registration*
- *Permit of a pit or proposed alternative method*
- *Closure of a pit, below-grade tank, or proposed alternative method*
- *Modification to an existing permit/or registration*
- *Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method*

****The fifth box of these choices needs to be marked, and following that section, all remaining areas of the form that are pertinent to this disposal pit remediation need to be filled out.**

Please Note: Photos were taken by BLM on 5/4/17 of the Sun Federal #1 Tank Battery location where the unpermitted disposal pit exists, where the contaminated releases in the pasture area occurred and where dismantled equipment was left. Those and any other spill areas are to be cleaned up to OCD rules and regulations standards and because they were identified by an environmental regulatory inspector it will now be required that a C-141 be submitted for these releases so that they may be tracked within the OCD data system. As BLM Environmental Protection Specialist, Henryetta Price, mentioned both the BLM and OCD will need to be notified once remediation procedures are being mobilized with 48 hours in advance so that both regulatory parties are able to consider being present on site.

It is OCD's understanding that a pre-existing spill had occurred at the Sun Federal #1 tank battery location back in 7/2015 and was given a case number of 2RP-3242. After the OCD received the initial C-141 and its attachments no other follow up documentation or update on status of this release was provided to the OCD. I have attached the initial C-141 and the said attachments that were sent in from the operator at the time of the spill's origination. A follow up of this release is also being requested at this time.

Thank you for your cooperation and if you have any questions or concerns please contact myself or Mr. Mike Bratcher at OCD Artesia District II Office.

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1st Street

Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

Fax: 575-748-9720

From: Price, Henryetta [<mailto:hprice@blm.gov>]

Sent: Monday, May 15, 2017 4:07 PM

To: buddy_delong@msn.com

Cc: James Amos <James_Amos@blm.gov>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Subject: Sun Fed Tank Batt

Buddy,

Below are my inspection remarks for the above location. Sampling will occur within the impacted area and delineated in accordance within NMOCD Guidelines. As mentioned earlier, we do not recommend dig and haul if we can address the impacts on location. This will depend on the amount of contaminants on location, depth to ground water, and proposed method. I am going to require that you give me 48 hours notice so that I am available for sampling. Thank you.

Inspection remarks:

Noticed some staining in the pasture east of the battery. Looks like a metal flow line had a leak and was fixed. No spills have been reported for that incident. Area impacted in the pasture was about 3x15ft. if not more. And another area approx. 5x8 ft in the pasture.

Cattle is present in the area. High recreation area.

Unapproved disposal pit is in use within the berm. PVC pipe runs from the open top tank into the disposal pit. No requests or approval given for the pit.

Contaminated soils and dismantled gunbarrel just outside the battery and in the pasture.

Most of the contaminants within the berm from the reported EU on 7/2/15 have been removed from within the berm and placed outside the berm area.

No analyticals have been submitted. No work plan has been submitted or approved.

Closure report not received.

Called Sweatt about the location and current contact information. They will have until the end of the week to make contact with their pumper Buddy Delong who is their contact for this clean up. Otherwise INC will be issued. Recommend to have inspector present during sampling to ensure they are reporting/ and collecting samples correctly.

Henryetta Price

Environmental Protection Specialist

Bureau Of Land Management

Hprice@blm.gov

Phone 575-234-5951

Cell 575-706-2780
Fax 575-234-5927

*Please remember that Lesser Prairie Chicken timing stipulations are in effect 01 Mar- 15 June Annually

* Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.

Bratcher, Mike, EMNRD

From: Mike Stubblefield <mike@rthicksconsult.com>
Sent: Tuesday, June 20, 2017 4:55 PM
To: Weaver, Crystal, EMNRD
Cc: Bratcher, Mike, EMNRD; hprice@blm.gov; 'BUDDY DELONG'
Subject: W J Sweat * Sun Federal #1 * 30-015-05711

Dear Ms. Crystal Weaver,

W.A. Sweat has contracted R.T. Hicks Consultants to address the issues listed in Ms. Henrietta Prices email to Buddy Delong for the Sun Federal no.1 tank battery. Please grant us some time, we will notify you to witness soil samples to be collected at the facility for laboratory analysis. A remediation work plan will be constructed for the release that occurred 7/2/2015 at the Sun Federal tank battery, the remediation work plan will be based upon analytical reports from laboratory. A C-144 form will be submitted for closure on the disposal pit located at the tank battery. Please send further correspondence for the Sun Federal tank battery to Randy Hicks and myself.

Sincerely,

Mike Stubblefield
RT Hicks Consultants
Cell: 575-365-5034

Bratcher, Mike, EMNRD

From: Price, Henryetta <hprice@blm.gov>
Sent: Wednesday, June 21, 2017 9:38 AM
To: mike@rthicksconsult.com
Cc: Weaver, Crystal, EMNRD; Bratcher, Mike, EMNRD; BUDDY DELONG
Subject: Re: W J Sweat * Sun Federal #1 * 30-015-05711

Good Morning Mike,

Thank you for the notification. Do you have an estimated timeline when samples will be collected and work plan submitted?

Henryetta Price

Environmental Protection Specialist
Bureau Of Land Management

[Hprice@blm.gov](mailto:hprice@blm.gov)

Phone 575-234-5951

Cell 575-706-2780

Fax 575-234-5927

* Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.

On Tue, Jun 20, 2017 at 4:54 PM, Mike Stubblefield <mike@rthicksconsult.com> wrote:

Dear Ms. Crystal Weaver,

W.A. Sweat has contracted R.T. Hicks Consultants to address the issues listed in Ms. Henrietta Prices email to Buddy Delong for the Sun Federal no.1 tank battery. Please grant us some time, we will notify you to witness soil samples to be collected at the facility for laboratory analysis. A remediation work plan will be constructed for the release that occurred 7/2/2015 at the Sun Federal tank battery, the remediation work plan will be based upon analytical reports from laboratory. A C-144 form will be submitted for closure on the disposal pit located at the tank battery. Please send further correspondence for the Sun Federal tank battery to Randy Hicks and myself.

Sincerely,

Mike Stubblefield

RT Hicks Consultants

Cell: 575-365-5034

Bratcher, Mike, EMNRD

From: Weaver, Crystal, EMNRD
Sent: Friday, July 7, 2017 9:49 AM
To: Bratcher, Mike, EMNRD
Subject: FW: W J Sweat * Sun Federal #1 * 30-015-05711

I removed the pictures from my original send of this email and then forwarded it to you so that the pictures would not blow up your email box. 😊

From: Weaver, Crystal, EMNRD
Sent: Friday, July 7, 2017 9:46 AM
To: 'mike@rthicksconsult.com' <mike@rthicksconsult.com>; 'Randy Hicks' <r@rthicksconsult.com>
Cc: hprice@blm.gov; 'BUDDY DELONG' <BUDDY_DELONG@msn.com>; Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Subject: RE: W J Sweat * Sun Federal #1 * 30-015-05711

Hello all,

OCD inspected this site on 6/19/17 to inquire on any progress made since BLM's site inspection from 5/4/2017. Please note that all things found that are documented in the attached photos will need to be addressed such as:

- Contents of the open top tank - There appears to be a pink colored liquid substance inside the open top tank on site. The OCD requests that the contents be sampled and lab tested in order to identify the chemical composition of said substance. Based on OCDs regulation cited below we request that because the netting has ceased to cover across the top of the tank that a discovery inspection be conducted to determine that contents of this tank do not include dead migratory birds or other wildlife. OCD requests that regulatory parties from both the OCD and BLM be given 48 hours notice in advance before the said discovery inspection is conducted.

19.15.17.11 DESIGN AND CONSTRUCTION SPECIFICATIONS:

E. Netting. The operator shall ensure that a permanent pit, a multi-well fluid management pit, or an open top tank is screened, netted or otherwise rendered non-hazardous to wildlife, including migratory birds. Where netting or screening is not feasible, the operator shall on a monthly basis inspect for, and within 30 days of discovery, report discovery of dead migratory birds or other wildlife to the appropriate wildlife agency and to the appropriate division district office in order to facilitate assessment and implementation of measures to prevent incidents from reoccurring.

- We still require a C-141 to document the areas where any spill has occurred that is not relevant to the preexisting OCD case number 2RP-3242, i.e. staining sighted in the pasture areas (during the original inspection on 5/4/17 and in the pictures attached taken from this inspection IMG 6723, 6721, and 6731) and notable contamination can be seen around the ground around the open top tank and is documented in the photo above numbered IMG 6719.
- As stated on my original email sent to Buddy Delong (back on 5/23/17) "A C-144 needs to be filled out regarding the unpermitted disposal pit and a remediation proposal for the pit needs to be turned in to the OCD no later than 6/2/17. A full delineation of this site will be required so please make sure to include that within your remediation proposal." Since that time has passed please remit the C-144 and the remediation proposal immediately.

If you have any questions or concerns please contact myself or Mike Bratcher here at the OCD District II Office.

Thank you,

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1st Street

Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

Fax: 575-748-9720

From: Mike Stubblefield [<mailto:mike@rthicksconsult.com>]

Sent: Tuesday, June 20, 2017 4:55 PM

To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; hprice@blm.gov; 'BUDDY DELONG' <BUDDY_DELONG@msn.com>

Subject: W J Sweat * Sun Federal #1 * 30-015-05711

Dear Ms. Crystal Weaver,

W.A. Sweat has contracted R.T. Hicks Consultants to address the issues listed in Ms. Henrietta Prices email to Buddy Delong for the Sun Federal no.1 tank battery. Please grant us some time, we will notify you to witness soil samples to be collected at the facility for laboratory analysis. A remediation work plan will be constructed for the release that occurred 7/2/2015 at the Sun Federal tank battery, the remediation work plan will be based upon analytical reports from laboratory. A C-144 form will be submitted for closure on the disposal pit located at the tank battery. Please send further correspondence for the Sun Federal tank battery to Randy Hicks and myself.

Sincerely,

Mike Stubblefield
RT Hicks Consultants
Cell: 575-365-5034

Bratcher, Mike, EMNRD

From: Mike Stubblefield <mike@rthicksconsult.com>
Sent: Friday, July 21, 2017 10:48 AM
To: Weaver, Crystal, EMNRD
Cc: Bratcher, Mike, EMNRD; 'BUDDY DELONG'; 'Randall Hicks'; hprice@blm.gov
Subject: Sampling at the WJ Sweatt Sun Federal No.1 tank battery

Dear Ms. Weaver,

On 7/26/2017 at 10:00 am a fluid sample will be collected for laboratories analysis from the fluids located with-in the open top tank located at the W.J. Sweat Sun Federal No.1. My client Buddy Delong has requested a representative from NMOCD be present during the sampling event. Please contact me if further information is required.

Mike Stubblefield
RT Hicks Consultants
Cell: 575-365-5034

Bratcher, Mike, EMNRD

From: Weaver, Crystal, EMNRD
Sent: Friday, July 21, 2017 11:57 AM
To: mike@rthicksconsult.com
Cc: Bratcher, Mike, EMNRD; 'BUDDY DELONG'; 'Randall Hicks'; hprice@blm.gov
Subject: RE: Sampling at the WJ Sweatt Sun Federal No.1 tank battery

Hello Mr. Stubblefield,

Thank you for getting back to me with time to plan ahead. I would agree that it is best that an Env. representative of either OCD or BLM or both be present to witness this sampling procedure. However, that specific date and time you have suggested is already filled by another operator on the OCD Environmental team's calendar. May I please request a change of date? The time is a good time for us, but could it possibly be moved to 7/25 or 7/27?

Thank you,

Crystal Weaver

Environmental Specialist
OCD – Artesia District II
811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
Cell: 575-840-5963
Fax: 575-748-9720

From: Mike Stubblefield [mailto:mike@rthicksconsult.com]
Sent: Friday, July 21, 2017 10:48 AM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; 'BUDDY DELONG' <BUDDY_DELONG@msn.com>; 'Randall Hicks' <r@rthicksconsult.com>; hprice@blm.gov
Subject: Sampling at the WJ Sweatt Sun Federal No.1 tank battery

Dear Ms. Weaver,

On 7/26/2017 at 10:00 am a fluid sample will be collected for laboratories analysis from the fluids located with-in the open top tank located at the W.J. Sweat Sun Federal No.1. My client Buddy Delong has requested a representative from NMOCDD be present during the sampling event. Please contact me if further information is required.

Mike Stubblefield
RT Hicks Consultants
Cell: 575-365-5034

Bratcher, Mike, EMNRD

From: Mike Stubblefield <mike@rthicksconsult.com>
Sent: Tuesday, July 25, 2017 7:45 AM
To: Weaver, Crystal, EMNRD
Cc: Bratcher, Mike, EMNRD; hprice@blm.gov; 'BUDDY DELONG'; 'Randall Hicks'
Subject: W.J. Sweat Sun Federal no.1 sampling at tank battery

Dear Ms. Weaver,

On 7/27/2017 at 10:00 am a fluid sample will be collected for laboratories analysis from the fluids located with-in the open top tank located at the W.J. Sweat Sun Federal No.1. My client Buddy Delong has requested a representative from NMOCD be present during the sampling event. Please contact me if further information is required.

Mike Stubblefield
RT Hicks Consultants
Cell: 575-365-5034

Bratcher, Mike, EMNRD

From: Price, Henryetta <hprice@blm.gov>
Sent: Wednesday, July 26, 2017 1:04 PM
To: mike@rthicksconsult.com
Cc: Weaver, Crystal, EMNRD; Bratcher, Mike, EMNRD; BUDDY DELONG; Randall Hicks
Subject: Re: W.J. Sweat Sun Federal no.1 sampling at tank battery

I thought we were also doing the sampling from the disposal pit?

Henryetta Price

Environmental Protection Specialist
Bureau Of Land Management

[Hprice@blm.gov](mailto:hprice@blm.gov)

Phone 575-234-5951

Cell 575-706-2780

Fax 575-234-5927

* Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.

On Tue, Jul 25, 2017 at 7:45 AM, Mike Stubblefield <mike@rthicksconsult.com> wrote:

Dear Ms. Weaver,

On 7/27/2017 at 10:00 am a fluid sample will be collected for laboratories analysis from the fluids located with-in the open top tank located at the W.J. Sweat Sun Federal No.1. My client Buddy Delong has requested a representative from NMOCD be present during the sampling event. Please contact me if further information is required.

Mike Stubblefield

RT Hicks Consultants

Cell: 575-365-5034

Bratcher, Mike, EMNRD

From: Mike Stubblefield <mike@rthicksconsult.com>
Sent: Tuesday, August 1, 2017 8:31 PM
To: Weaver, Crystal, EMNRD
Cc: Bratcher, Mike, EMNRD; 'Price, Henryetta'; 'BUDDY DELONG'; 'Randall Hicks'
Subject: W.J. Sweat Sun Federal No.1 Notice for sampling from production pit.

Dear Ms. Weaver,

On Thursday 8/3/2017 at 8:00am R.T. Hicks Consultants will be collecting soil samples from the production pit located at the W.J. Sweat Sun Federal No.1 tank battery. Please contact me if further information is required.

Sincerely,

Mike Stubblefieldwe
RT Hicks Consultants
Cell: 575-365-5034

Bratcher, Mike, EMNRD

From: Mike Stubblefield <mike@rthicksconsult.com>
Sent: Thursday, August 3, 2017 3:34 AM
To: 'Price, Henryetta'
Cc: Weaver, Crystal, EMNRD; Bratcher, Mike, EMNRD; 'BUDDY DELONG'; 'Randall Hicks'
Subject: WJ Sweat Sun Federal No.1 Collecting soil samples from production pit

Dear Ms. Price,

The backhoe scheduled to collect samples from the production pit at WJ Sweat Sun Federal No.1 will not be on location until 11:00am tomorrow Thursday 8/4/2017. Crystal Weaver may not be able to attend the sampling and has requested your attendance to witness the sampling. Please call me in the morning early to let me know if you can be on location during sampling at the Sun Federal No.1 production pit...

Sincerely,

Mike Stubblefield
RT Hicks Consultants
Cell: 575-365-5034

Bratcher, Mike, EMNRD

From: Price, Henryetta <hprice@blm.gov>
Sent: Monday, May 15, 2017 12:27 PM
To: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD
Subject: Sweatt W J- Water disposal pit

Good Morning,

I drove by one of Sweatt's battery (Sun Fed Tank Batt) a week or so ago and found that there is an unlined disposal pit in use. There is a PVC pipe that runs from the open top tank to the disposal pit.

There was also a fire on or around 7/2/15 which I don't think was closed out. Dara, our temporary employee was handling this location and no follow up was completed. I don't know if any samples or closure was submitted to NMOCD.

API-30-015-05711 2RP-3242

Henryetta Price

Environmental Protection Specialist
Bureau Of Land Management

[Hprice@blm.gov](mailto:hprice@blm.gov)

Phone 575-234-5951

Cell 575-706-2780

Fax 575-234-5927

*Please remember that Lesser Prairie Chicken timing stipulations are in effect 01 Mar- 15 June Annually

* Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.

Bratcher, Mike, EMNRD

From: Mike Stubblefield <mike@rthicksconsult.com>
Sent: Thursday, August 3, 2017 7:22 AM
To: 'Price, Henryetta'
Cc: Weaver, Crystal, EMNRD; Bratcher, Mike, EMNRD; 'BUDDY DELONG'; 'Randall Hicks'
Subject: RE: W.J. Sweat Sun Federal no.1 sampling at tank battery

Henryetta,

Yes, we will be sampling from the disposal pit. My backhoe will be there by 11:00am. Will you be able to be on location?

Mike Stubblefield
RT Hicks Consultants
Cell: 575-365-5034

From: Price, Henryetta [mailto:hprice@blm.gov]
Sent: Wednesday, July 26, 2017 1:04 PM
To: mike@rthicksconsult.com
Cc: Weaver, Crystal, EMNRD; Bratcher, Mike, EMNRD; BUDDY DELONG; Randall Hicks
Subject: Re: W.J. Sweat Sun Federal no.1 sampling at tank battery

I thought we were also doing the sampling from the disposal pit?

Henryetta Price

Environmental Protection Specialist
Bureau Of Land Management
[Hprice@blm.gov](mailto:hprice@blm.gov)
Phone 575-234-5951
Cell 575-706-2780
Fax 575-234-5927

* Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.

On Tue, Jul 25, 2017 at 7:45 AM, Mike Stubblefield <mike@rthicksconsult.com> wrote:

Dear Ms. Weaver,

On 7/27/2017 at 10:00 am a fluid sample will be collected for laboratories analysis from the fluids located with-in the open top tank located at the W.J. Sweat Sun Federal No.1. My client Buddy Delong has requested a representative from NMOCD be present during the sampling event. Please contact me if further information is required.

Mike Stubblefield

RT Hicks Consultants

Cell: 575-365-5034

Bratcher, Mike, EMNRD

From: Mike Stubblefield <mike@rthicksconsult.com>
Sent: Monday, August 7, 2017 2:55 PM
To: Weaver, Crystal, EMNRD
Cc: Bratcher, Mike, EMNRD; 'Price, Henryetta'; 'BUDDY DELONG'; 'Randall Hicks'
Subject: WJ Sweat Sun Federal No.1 Sampling from disposal pit

Dear Ms. Weaver,

On Wednesday 8/9/2017 at 8:00am R.T. Hicks Consultants will be collecting soil samples from the disposal pit located at the WJ Sweat Sun Federal No.1 tank battery. Please contact me if further information is required.

Sincerely,

Mike Stubblefield
RT Hicks Consultants
Cell: 575-365-5034

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Tuesday, August 8, 2017 6:43 AM
To: 'mike@rthicksconsult.com'; Weaver, Crystal, EMNRD
Cc: 'Price, Henryetta'; 'BUDDY DELONG'; 'Randall Hicks'
Subject: RE: WJ Sweat Sun Federal No.1 Sampling from disposal pit

Mike,

What is the status of samples obtained on 8/3/17?

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia NM 88210
575-748-1283 Ext 108
mike.bratcher@state.nm.us

From: Mike Stubblefield [mailto:mike@rthicksconsult.com]
Sent: Monday, August 7, 2017 2:55 PM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; 'Price, Henryetta' <hprice@blm.gov>; 'BUDDY DELONG' <BUDDY_DELONG@msn.com>; 'Randall Hicks' <r@rthicksconsult.com>
Subject: WJ Sweat Sun Federal No.1 Sampling from disposal pit

Dear Ms. Weaver,

On Wednesday 8/9/2017 at 8:00am R.T. Hicks Consultants will be collecting soil samples from the disposal pit located at the WJ Sweat Sun Federal No.1 tank battery. Please contact me if further information is required.

Sincerely,

Mike Stubblefield
RT Hicks Consultants
Cell: 575-365-5034

Bratcher, Mike, EMNRD

From: Mike Stubblefield <mike@rthicksconsult.com>
Sent: Tuesday, August 8, 2017 11:09 AM
To: Bratcher, Mike, EMNRD
Cc: Weaver, Crystal, EMNRD; 'Price, Henryetta'; 'BUDDY DELONG'; 'Randall Hicks'
Subject: FW: SUN FEDERAL NO 1
Attachments: H702042 RT HICKS.pdf

Dear Mr. Bratcher,

R.T. Hicks Consultants is sending the analytical testing results for soil samples collected on 8/3/2017 from the disposal pit at Sun Federal No.1 tank battery. Please contact me if further information is required.

Sincerely,

Mike Stubblefield
RT Hicks Consultants
Cell: 575-365-5034

From: Celey Keene [mailto:celey.keene@cardinallabsnm.com]
Sent: Friday, August 4, 2017 3:38 PM
To: mike@rthicksconsult.com; Randy Hicks
Subject: SUN FEDERAL NO 1

THANK YOU,

Celey Keene
Lab Director
Cardinal Laboratories
101 East Marland
Hobbs, NM 88240
T: (575) 393-2326
F: (575) 393-2476
e-mail: celey.keene@cardinallabsnm.com

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PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

August 04, 2017

MIKE STUBBLEFIELD

R T HICKS CONSULTANTS

901 RIO GRANDE BLVD SUITE F-142

ALBUQUERQUE, NM 87104

RE: SUN FEDERAL #1

Enclosed are the results of analyses for samples received by the laboratory on 08/03/17 15:35.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene".

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
 MIKE STUBBLEFIELD
 901 RIO GRANDE BLVD SUITE F-142
 ALBUQUERQUE NM, 87104
 Fax To: NONE

Received: 08/03/2017
 Reported: 08/04/2017
 Project Name: SUN FEDERAL #1
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 08/03/2017
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Tamara Oldaker

Sample ID: BH -1 10' (H702042-07)

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.500	0.500	08/04/2017	ND	2.27	113	2.00	1.36	
Toluene*	<0.500	0.500	08/04/2017	ND	2.10	105	2.00	0.0527	
Ethylbenzene*	7.60	0.500	08/04/2017	ND	2.19	110	2.00	1.11	
Total Xylenes*	12.2	1.50	08/04/2017	ND	6.57	109	6.00	0.942	
Total BTX	20.0	3.00	08/04/2017	ND					

Surrogate: 4-Bromofluorobenzene (PID) 112 % 72-148

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	848	16.0	08/04/2017	ND	432	108	400	3.64	

TPH 8015M		mg/kg		Analyzed By: MS						S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	633	50.0	08/04/2017	ND	188	94.2	200	2.39		
DRO >C10-C28	3610	50.0	08/04/2017	ND	194	97.0	200	2.57		

Surrogate: 1-Chlorooctane 135 % 28.3-164

Surrogate: 1-Chlorooctadecane 161 % 34.7-157

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

Notes and Definitions

S-06	The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

Company Name: R.T. Hicks Corp Project Manager: Mike Stoddard Address: 2411 S. 13th City: Alfesa State: NM Zip: 88210 Phone #: 505-345-5054 Fax #: Project #: Project Owner: Project Name: Sun Federal No. 1 Project Location: Sampler Name: Mike Stoddard FOR LAB USE ONLY				BILL TO P.O. #: Company: Antonia Consultants Attn: Address: City: San Juan State: Zip: Phone #: Fax #: 			
Lab I.D. H702012 Sample I.D.		(G)RAB OR (C)OMP. # CONTAINERS GROUNDWATER WASTEWATER SOIL OIL SLUDGE OTHER : ACID/BASE: ICE / COOL OTHER :		MATRIX PRESERV SAMPLING			
1 BH-1 0' 2 BH-1 1' 3 BH-1 3' 4 BH-1 4' 5 BH-1 6' 6 BH-1 8' 7 BH-1 10'		8/3/97 12:35 8/3/97 12:30 8/3/97 12:40 8/3/97 12:45 8/3/97 12:50 8/3/97 1:00 8/3/97 1:15		DATE TIME 8/3/97 12:35 8/3/97 12:30 8/3/97 12:40 8/3/97 12:45 8/3/97 12:50 8/3/97 1:00 8/3/97 1:15			
Relinquished By: Mike Stoddard Date: 8-3-17 Time: 3:35		Received By: Antonia Consultants Date: 8-3-17 Time: 3:35		Sample Condition Cool <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No CHECKED BY: TD: #75			
Delivered By: (Circle One) W.8 Sampler - UPS - Bus - Other: Consult 18.052		Rush - BTEX + CL on #7 only Reg - TPH Hold - 1-6 Request directly to lab from field		REMARKS: Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #: Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Fax #: 			

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Tuesday, August 8, 2017 11:27 AM
To: 'mike@rthicksconsult.com'
Cc: Weaver, Crystal, EMNRD; 'Price, Henryetta'; 'BUDDY DELONG'; 'Randall Hicks'
Subject: RE: SUN FEDERAL NO 1

Mike,

My understanding, from you, was that analyses would be conducted on all the samples obtained that day. Looks like only the 10' interval was run. What exactly is the plan for this next sampling event?

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia NM 88210
575-748-1283 Ext 108
mike.bratcher@state.nm.us

From: Mike Stubblefield [mailto:mike@rthicksconsult.com]
Sent: Tuesday, August 8, 2017 11:09 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; 'Price, Henryetta' <hprice@blm.gov>; 'BUDDY DELONG' <BUDDY_DELONG@msn.com>; 'Randall Hicks' <r@rthicksconsult.com>
Subject: FW: SUN FEDERAL NO 1

Dear Mr. Bratcher,

R.T. Hicks Consultants is sending the analytical testing results for soil samples collected on 8/3/2017 from the disposal pit at Sun Federal No.1 tank battery. Please contact me if further information is required.

Sincerely,

Mike Stubblefield
RT Hicks Consultants
Cell: 575-365-5034

From: Celey Keene [mailto:celey.keene@cardinallabsnm.com]
Sent: Friday, August 4, 2017 3:38 PM
To: mike@rthicksconsult.com; Randy Hicks
Subject: SUN FEDERAL NO 1

THANK YOU,

Celey Keene
Lab Director
Cardinal Laboratories
101 East Marland

Hobbs, NM 88240
T: (575) 393-2326
F: (575) 393-2476
e-mail: celey.keene@cardinallabsnm.com

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Bratcher, Mike, EMNRD

From: Randall Hicks <r@rthicksconsult.com>
Sent: Tuesday, August 8, 2017 11:52 AM
To: Bratcher, Mike, EMNRD; mike@rthicksconsult.com
Cc: Weaver, Crystal, EMNRD; 'Price, Henryetta'; 'BUDDY DELONG'
Subject: RE: SUN FEDERAL NO 1

We put a rush on the 10' sample to see what's up. The other sample(s) are not complete at this time.

The goal for the next event is to collect representative samples as deep as we can get.

While one sample does not a complete picture make, I was not surprised by the lack of regulated groundwater constituents for hydrocarbons (BTEX). The chloride value will need some additional samples to verify – but I am not astonished by this first result.

TPH values are not surprising – but we need to get the MRO concentration – which can probably be read from the existing chromatogram, so we will give Cardinal a call to get that result. As you may be aware, when you ask a laboratory for TPH via 8015, you typically only get GRO + DRO.

More later

Randall Hicks
R.T. Hicks Consultants
Cell: 505-238-9515
Office: 505-266-5004

From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
Sent: Tuesday, August 08, 2017 11:27 AM
To: mike@rthicksconsult.com
Cc: Weaver, Crystal, EMNRD; 'Price, Henryetta'; 'BUDDY DELONG'; 'Randall Hicks'
Subject: RE: SUN FEDERAL NO 1

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Mike Bratcher
NMOCD District 2
811 South First Street
Artesia NM 88210
575-748-1283 Ext 108
mike.bratcher@state.nm.us

From: Mike Stubblefield [mailto:mike@rthicksconsult.com]
Sent: Tuesday, August 8, 2017 11:09 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; 'Price, Henryetta' <hprice@blm.gov>; 'BUDDY DELONG'

<BUDDY_DELONG@msn.com>; 'Randall Hicks' <r@rthicksconsult.com>

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Sincerely,

Mike Stubblefield
RT Hicks Consultants
Cell: 575-365-5034

From: Celey Keene [<mailto:celey.keene@cardinallabsnm.com>]

Sent: Friday, August 4, 2017 3:38 PM

To: mike@rthicksconsult.com; Randy Hicks

Subject: SUN FEDERAL NO 1

THANK YOU,

Celey Keene
Lab Director
Cardinal Laboratories
101 East Marland
Hobbs, NM 88240
T: (575) 393-2326
F: (575) 393-2476
e-mail: celey.keene@cardinallabsnm.com

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Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Tuesday, August 8, 2017 12:01 PM
To: 'Randall Hicks'; mike@rthicksconsult.com
Cc: Weaver, Crystal, EMNRD; 'Price, Henryetta'; 'BUDDY DELONG'
Subject: RE: SUN FEDERAL NO 1

Which is why you ask for Extended Range, which we talked about onsite. Please hold up on the C-144. I think we are going to be able to treat this as an unauthorized release and just use a C-141. Since this "pit" should have been closed under the 2008 rule, and the current rule does not allow for unlined pits at all, I think a C-141 would work.

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia NM 88210
575-748-1283 Ext 108
mike.bratcher@state.nm.us

From: Randall Hicks [mailto:r@rthicksconsult.com]
Sent: Tuesday, August 8, 2017 11:52 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; mike@rthicksconsult.com
Cc: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; 'Price, Henryetta' <hprice@blm.gov>; 'BUDDY DELONG' <BUDDY_DELONG@msn.com>
Subject: RE: SUN FEDERAL NO 1

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More later

Randall Hicks
R.T. Hicks Consultants
Cell: 505-238-9515
Office: 505-266-5004

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Sent: Tuesday, August 08, 2017 11:27 AM
To: mike@rthicksconsult.com

Cc: Weaver, Crystal, EMNRD; 'Price, Henryetta'; 'BUDDY DELONG'; 'Randall Hicks'
Subject: RE: SUN FEDERAL NO 1

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Mike Bratcher
NMOCD District 2
811 South First Street
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mike.bratcher@state.nm.us

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Sent: Tuesday, August 8, 2017 11:09 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; 'Price, Henryetta' <hprice@blm.gov>; 'BUDDY DELONG' <BUDDY_DELONG@msn.com>; 'Randall Hicks' <r@rthicksconsult.com>
Subject: FW: SUN FEDERAL NO 1

Dear Mr. Bratcher,

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Sincerely,

Mike Stubblefield
RT Hicks Consultants
Cell: 575-365-5034

From: Celey Keene [<mailto:celey.keene@cardinallabsnm.com>]
Sent: Friday, August 4, 2017 3:38 PM
To: mike@rthicksconsult.com; Randy Hicks
Subject: SUN FEDERAL NO 1

THANK YOU,

Celey Keene
Lab Director
Cardinal Laboratories
101 East Marland
Hobbs, NM 88240
T: (575) 393-2326
F: (575) 393-2476
e-mail: celey.keene@cardinallabsnm.com

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Bratcher, Mike, EMNRD

From: Mike Stubblefield <mike@rthicksconsult.com>
Sent: Tuesday, August 8, 2017 10:51 PM
To: Bratcher, Mike, EMNRD
Cc: Weaver, Crystal, EMNRD; 'Price, Henryetta'; 'BUDDY DELONG'; 'Randall Hicks'
Subject: W.P. Sweat Sun Federal No.1 change of time for sampling from disposal pit

Mike,

The sampling time for collecting soil samples from the disposal pit at the Sun Federal No.1 has been changed from 8:00am to 11:00am. Please contact me if further information is needed.

Mike Stubblefield
RT Hicks Consultants
Cell: 575-365-5034

Bratcher, Mike, EMNRD

From: Mike Stubblefield <mike@rthicksconsult.com>
Sent: Tuesday, August 22, 2017 10:16 AM
To: Bratcher, Mike, EMNRD
Cc: Weaver, Crystal, EMNRD; 'Price, Henryetta'; 'BUDDY DELONG'; 'Randall Hicks'
Subject: Emailing: Sun Federal No.1 analytical results for deep samples H702129 RT HICKS
Attachments: Sun Federal No.1 analytical results for deep samples H702129 RT HICKS.pdf

Mike,

R.T. Hicks consultants is sending the analytical results for samples collected from the disposal pit located at W.P. Sweat Sun Federal No.1 tank battery. The samples were collected from 10' below ground surface to 25' bgs utilizing a track hoe. The surface equipment will be removed from the tank battery by Friday. I will notify you before samples are collected from the impacted areas at the tank battery. A C-141 form for closure on the release located with-in the disposal pit which also will cover the other historic release areas on the tank battery site and the minor release outside of the battery area will then be submitted to NMOCD and BLM. A remediation plan will be attached to the C-141 form. Please contact me if further information is required.

Mike Stubblefield
R.T. Hicks Consultants
575-365-5034

Your message is ready to be sent with the following file or link attachments:

Sun Federal No.1 analytical results for deep samples H702129 RT HICKS

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Bratcher, Mike, EMNRD

From: Price, Henryetta <hprice@blm.gov>
Sent: Monday, May 15, 2017 4:07 PM
To: buddy_delong@msn.com
Cc: James Amos; Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD
Subject: Sun Fed Tank Batt

Buddy,

Below are my inspection remarks for the above location. Sampling will occur within the impacted area and delineated in accordance within NMOC Guidelines. As mentioned earlier, we do not recommend dig and haul if we can address the impacts on location. This will depend on the amount of contaminants on location, depth to ground water, and proposed method. I am going to require that you give me 48 hours notice so that I am available for sampling. Thank you.

Inspection remarks:

Noticed some staining in the pasture east of the battery. Looks like a metal flow line had a leak and was fixed. No spills have been reported for that incident. Area impacted in the pasture was about 3x15ft. if not more. And another area approx. 5x8 ft in the pasture.

Cattle is present in the area. High recreation area.

Unapproved disposal pit is in use within the berm. PVC pipe runs from the open top tank into the disposal pit. No requests or approval given for the pit.

Contaminated soils and dismantled gunbarrel just outside the battery and in the pasture.

Most of the contaminants within the berm from the reported EU on 7/2/15 have been removed from within the berm and placed outside the berm area.

No analyticals have been submitted. No work plan has been submitted or approved.

Closure report not received.

Called Sweatt about the location and current contact information. They will have until the end of the week to make contact with their pumper Buddy Delong who is their contact for this clean up. Otherwise INC will be issued. Recommend to have inspector present during sampling to ensure they are reporting/ and collecting samples correctly.

Henryetta Price

Environmental Protection Specialist
Bureau Of Land Management

[Hprice@blm.gov](mailto:hprice@blm.gov)

Phone 575-234-5951

Cell 575-706-2780

Fax 575-234-5927

*Please remember that Lesser Prairie Chicken timing stipulations are in effect 01 Mar- 15 June
Annually

* Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

August 17, 2017

MIKE STUBBLEFIELD

R T HICKS CONSULTANTS

901 RIO GRANDE BLVD SUITE F-142

ALBUQUERQUE, NM 87104

RE: SUN FEDERAL #1

Enclosed are the results of analyses for samples received by the laboratory on 08/11/17 16:20.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
 MIKE STUBBLEFIELD
 901 RIO GRANDE BLVD SUITE F-142
 ALBUQUERQUE NM, 87104
 Fax To: NONE

Received:	08/11/2017	Sampling Date:	08/09/2017
Reported:	08/17/2017	Sampling Type:	Soil
Project Name:	SUN FEDERAL #1	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	NOT GIVEN		

Sample ID: BH-1 10' (H702129-01)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	752	16.0	08/17/2017	ND	400	100	400	3.92	

Sample ID: BH-1 15' (H702129-02)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	784	16.0	08/17/2017	ND	400	100	400	3.92	

Sample ID: BH-1 20' (H702129-03)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1520	16.0	08/17/2017	ND	400	100	400	3.92	

Sample ID: BH-1 25' (H702129-04)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1020	16.0	08/17/2017	ND	400	100	400	3.92	

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
 MIKE STUBBLEFIELD
 901 RIO GRANDE BLVD SUITE F-142
 ALBUQUERQUE NM, 87104
 Fax To: NONE

Received:	08/11/2017	Sampling Date:	08/09/2017
Reported:	08/17/2017	Sampling Type:	Soil
Project Name:	SUN FEDERAL #1	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	NOT GIVEN		

Sample ID: S-2 STOCKPILED SOIL (H702129-05)

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/15/2017	ND	1.77	88.7	2.00	2.16		
Toluene*	<0.050	0.050	08/15/2017	ND	1.68	83.8	2.00	1.72		
Ethylbenzene*	<0.050	0.050	08/15/2017	ND	1.75	87.5	2.00	1.81		
Total Xylenes*	<0.150	0.150	08/15/2017	ND	5.26	87.7	6.00	1.90		
Total BTEx	<0.300	0.300	08/15/2017	ND						

Surrogate: 4-Bromofluorobenzene (PID) 104 % 72-148

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	304	16.0	08/17/2017	ND	400	100	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS				S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<50.0	50.0	08/15/2017	ND	212	106	200	0.639	
DRO >C10-C28	4100	50.0	08/15/2017	ND	211	105	200	1.44	
EXT DRO >C28-C36	1570	50.0	08/15/2017	ND					

Surrogate: 1-Chlorooctane 69.5 % 28.3-164

Surrogate: 1-Chlorooctadecane 182 % 34.7-157

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Notes and Definitions

S-06	The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

Company Name: RT Hicks Consulting		P.O. #:		BILL TO												ANALYSIS REQUEST																									
Project Manager: Mike Stubblefield		Company: Sweet																																							
Address: 24115, 15th Street		Attn: Walt Hicks																																							
City: Alfred		Address:																																							
State: NM		City:																																							
Zip: 88240		State:																																							
Phone #: 505-865-0334		City:																																							
Fax #: 505-865-0334		State:																																							
Project #: WP Sweet		City:																																							
Project Owner: Sun Federal M1 Tank battery		State:																																							
Project Location: Project Name: Sun Federal M1 Tank battery		Zip:																																							
Sample Name: Rock Sweet		Phone #:																																							
Fax #:																																									
FOR LAB USE ONLY																																									
Lab I.D. HT02128		Sample I.D.		(G)RAB OR (C)OMP.		# CONTAINERS		GROUNDWATER		WASTEWATER		SOIL		OIL		SLUDGE		OTHER :		ACID/BASE:		ICE / COOL		OTHER :		DATE		TIME													
1 8H-1 10'		1		✓		1		✓		✓		✓		✓		✓		✓		✓		✓		✓		8/9/10		3:09P		Total Chloride 4500											
2 8H-1 15'		2		✓		1		✓		✓		✓		✓		✓		✓		✓		✓		✓		3:39P		8015M TPH													
3 8H-1 20'		3		✓		1		✓		✓		✓		✓		✓		✓		✓		✓		✓		3:49P		8021 R. BTEX													
4 8H-1 25'		4		✓		1		✓		✓		✓		✓		✓		✓		✓		✓		✓		4:18P															
5 Stockpiled soil		5		✓		1		✓		✓		✓		✓		✓		✓		✓		✓		✓																	
PLEASE NOTE: Liability and Damages, Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.		Relinquished By: ma5002128		Date: 8-11-17		Received By: Juanara Delacruz		Time: 4:20		Sample Condition: Intact		CHECKED BY: T-2-H-15		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No		Add'l Phone #: 505-865-0334		Add'l Fax #: 505-865-0334																					
Delivered By: (Circle One) 7:30		Sampler - UPS - Bus - Other: Connected 7:55		Time: 4:20		Received By: Juanara Delacruz		Time: 4:20		Sample Condition: Intact		CHECKED BY: T-2-H-15		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No		Add'l Phone #: 505-865-0334		Add'l Fax #: 505-865-0334																					

* Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326

Bratcher, Mike, EMNRD

From: Price, Henryetta <hprice@blm.gov>
Sent: Tuesday, August 22, 2017 10:58 AM
To: mike@rthicksconsult.com
Cc: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD; BUDDY DELONG; Randall Hicks
Subject: Re: Emailing: Sun Federal No.1 analytical results for deep samples H702129 RT HICKS

Good Morning Mike,

I will still need to get a work plan submitted and approved by myself and NMOCD prior to closing this incident. Also, please provide an average water report that is approved by NMOCD. I will not accept the the prior work plan previously submitted due to the lack of provided information.

Henryetta Price

Environmental Protection Specialist
Bureau Of Land Management

[Hprice@blm.gov](mailto:hprice@blm.gov)

Phone 575-234-5951

Cell 575-706-2780

Fax 575-234-5927

* Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.

On Tue, Aug 22, 2017 at 10:16 AM, Mike Stubblefield <mike@rthicksconsult.com> wrote:

Mike,

R.T. Hicks consultants is sending the analytical results for samples collected from the disposal pit located at W.P. Sweat Sun Federal No.1 tank battery. The samples were collected from 10' below ground surface to 25' bgs utilizing a track hoe. The surface equipment will be removed from the tank battery by Friday. I will notify you before samples are collected from the impacted areas at the tank battery. A C-141 form for closure on the release located with-in the disposal pit which also will cover the other historic release areas on the tank battery site and the minor release outside of the battery area will then be submitted to NMOCD and BLM. A remediation plan will be attached to the C-141 form. Please contact me if further information is required.

Mike Stubblefield
R.T. Hicks Consultants
575-365-5034

Your message is ready to be sent with the following file or link attachments:

Sun Federal No.1 analytical results for deep samples H702129 RT HICKS

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Bratcher, Mike, EMNRD

From: Mike Stubblefield <mike@rthicksconsult.com>
Sent: Wednesday, August 23, 2017 8:01 PM
To: Bratcher, Mike, EMNRD
Cc: Weaver, Crystal, EMNRD; 'Randall Hicks'
Subject: Emailing: Sun Federal; No.1 analytical results revised
Attachments: Sun Federa; No.1 analytical results revised.pdf

Mike,

R.T. Hicks Consultants is sending analytical testing results for soil samples collected from the disposal pit located at W.P. Sweat Sun Federal No.1. Please contact me if further information is required.

Mike Stubblefield
R.T. Hicks Consultants
575-365-5034

Your message is ready to be sent with the following file or link attachments:

Sun Federal; No.1 analytical results revised

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

August 11, 2017

MIKE STUBBLEFIELD

R T HICKS CONSULTANTS

901 RIO GRANDE BLVD SUITE F-142

ALBUQUERQUE, NM 87104

RE: SUN FEDERAL #1

Enclosed are the results of analyses for samples received by the laboratory on 08/03/17 15:35.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
 MIKE STUBBLEFIELD
 901 RIO GRANDE BLVD SUITE F-142
 ALBUQUERQUE NM, 87104
 Fax To: NONE

Received:	08/03/2017	Sampling Date:	08/03/2017
Reported:	08/11/2017	Sampling Type:	Soil
Project Name:	SUN FEDERAL #1	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	NOT GIVEN		

Sample ID: BH -1 0' (H702042-01)

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/10/2017	ND	2.03	102	2.00	1.52	
Toluene*	<0.050	0.050	08/10/2017	ND	1.88	94.1	2.00	0.520	
Ethylbenzene*	<0.050	0.050	08/10/2017	ND	1.93	96.7	2.00	0.352	
Total Xylenes*	<0.150	0.150	08/10/2017	ND	5.84	97.4	6.00	0.213	
Total BTEx	<0.300	0.300	08/10/2017	ND					

Surrogate: 4-Bromofluorobenzene (PID) 101 % 72-148

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	688	16.0	08/09/2017	ND	464	116	400	7.14		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<100	100	08/08/2017	ND	173	86.6	200	3.06	
DRO >C10-C28	3360	100	08/08/2017	ND	175	87.5	200	4.21	QM-07, QR-03
EXT DRO >C28-C36	859	100	08/08/2017	ND					

Surrogate: 1-Chlorooctane 73.6 % 28.3-164

Surrogate: 1-Chlorooctadecane 140 % 34.7-157

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
 MIKE STUBBLEFIELD
 901 RIO GRANDE BLVD SUITE F-142
 ALBUQUERQUE NM, 87104
 Fax To: NONE

Received: 08/03/2017
 Reported: 08/11/2017
 Project Name: SUN FEDERAL #1
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 08/03/2017
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Tamara Oldaker

Sample ID: BH -1 3' (H702042-03)

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.200	0.200	08/10/2017	ND	2.03	102	2.00	1.52	
Toluene*	<0.200	0.200	08/10/2017	ND	1.88	94.1	2.00	0.520	
Ethylbenzene*	<0.200	0.200	08/10/2017	ND	1.93	96.7	2.00	0.352	
Total Xylenes*	2.67	0.600	08/10/2017	ND	5.84	97.4	6.00	0.213	
Total BTEX	2.67	1.20	08/10/2017	ND					

Surrogate: 4-Bromofluorobenzene (PID) 136 % 72-148

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	1300	16.0	08/09/2017	ND	464	116	400	7.14		

TPH 8015M		mg/kg		Analyzed By: MS					S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	404	100	08/08/2017	ND	173	86.6	200	3.06		
DRO >C10-C28	5800	100	08/08/2017	ND	175	87.5	200	4.21		
EXT DRO >C28-C36	1450	100	08/08/2017	ND						

Surrogate: 1-Chlorooctane 98.5 % 28.3-164

Surrogate: 1-Chlorooctadecane 164 % 34.7-157

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
 MIKE STUBBLEFIELD
 901 RIO GRANDE BLVD SUITE F-142
 ALBUQUERQUE NM, 87104
 Fax To: NONE

Received: 08/03/2017
 Reported: 08/11/2017
 Project Name: SUN FEDERAL #1
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 08/03/2017
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Tamara Oldaker

Sample ID: BH -1 6' (H702042-05)

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<1.00	1.00	08/10/2017	ND	2.03	102	2.00	1.52	
Toluene*	3.81	1.00	08/10/2017	ND	1.88	94.1	2.00	0.520	
Ethylbenzene*	14.5	1.00	08/10/2017	ND	1.93	96.7	2.00	0.352	
Total Xylenes*	37.2	3.00	08/10/2017	ND	5.84	97.4	6.00	0.213	
Total BTEX	55.6	6.00	08/10/2017	ND					

Surrogate: 4-Bromofluorobenzene (PID) 112 % 72-148

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	1010	16.0	08/09/2017	ND	464	116	400	7.14		
TPH 8015M		mg/kg		Analyzed By: MS						S-06



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
 MIKE STUBBLEFIELD
 901 RIO GRANDE BLVD SUITE F-142
 ALBUQUERQUE NM, 87104
 Fax To: NONE

Received: 08/03/2017
 Reported: 08/11/2017
 Project Name: SUN FEDERAL #1
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 08/03/2017
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Tamara Oldaker

Sample ID: BH -1 10' (H702042-07)

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.500	0.500	08/04/2017	ND	2.27	113	2.00	1.36	
Toluene*	<0.500	0.500	08/04/2017	ND	2.10	105	2.00	0.0527	
Ethylbenzene*	7.60	0.500	08/04/2017	ND	2.19	110	2.00	1.11	
Total Xylenes*	12.2	1.50	08/04/2017	ND	6.57	109	6.00	0.942	
Total BTEX	20.0	3.00	08/04/2017	ND					

Surrogate: 4-Bromofluorobenzene (PID) 112 % 72-148

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	848	16.0	08/04/2017	ND	432	108	400	3.64		

TPH 8015M		mg/kg		Analyzed By: MS				S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	633	50.0	08/04/2017	ND	188	94.2	200	2.39	
DRO >C10-C28	3610	50.0	08/04/2017	ND	194	97.0	200	2.57	
EXT DRO >C28-C36	766	50.0	08/04/2017	ND					

Surrogate: 1-Chlorooctane 135 % 28.3-164

Surrogate: 1-Chlorooctadecane 161 % 34.7-157

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Notes and Definitions

S-06	The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
S-04	The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
QR-03	The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to matrix interference. QC batch accepted based on LCS and/or LCSD recovery and/or RPD values.
QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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A handwritten signature in black ink, appearing to read "C. D. Keene", written over a horizontal line.

Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

[illegible]

Bratcher, Mike, EMNRD

From: Randall Hicks <r@rthicksconsult.com>
Sent: Friday, September 1, 2017 3:09 PM
To: 'Price, Henryetta'; mike@rthicksconsult.com
Cc: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD; 'BUDDY DELONG'; 'Kristin Pope'
Subject: RE: Emailing: Sun Federal No.1 analytical results for deep samples H702129 RT HICKS

Ms. Price

The remediation plan was submitted to Kristin Pope yesterday for peer review and BLM and OCD can expect the plan next week. Part of the work plan is a detailed sampling plan to address the closure of the former production pit, restoration of the tank battery and restoration of surface releases (including removal of the heater-treater debris). The sampling plan will include set of Standard Operating Procedures consistent with EPA protocol. No additional sampling or site restoration will be implemented without BLM/OCD review and approval of a final written document.

At this time, we expect the plan will discuss these possible corrective actions

1. Closure of the former production pit (excavation, liner installation, placement of a 4-foot soil cover over the liner, re-vegetation) impacted material)
2. Surface restoration of the tank battery area (sample results will determine how this will proceed)
3. Off-haul of heater-treater debris

We will be evaluating the best approach for addressing impacted material, which may be off-site disposal or on-site treatment. We will be considering cost as well as creating the smallest environmental footprint with the least long-term liability. Sample results will help us evaluate these alternatives.

Have a good long weekend.

Randall Hicks
R.T. Hicks Consultants
Cell: 505-238-9515
Office: 505-266-5004

From: Price, Henryetta [mailto:hprice@blm.gov]
Sent: Friday, September 01, 2017 2:12 PM
To: mike@rthicksconsult.com; Randall Hicks
Cc: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD; BUDDY DELONG
Subject: Re: Emailing: Sun Federal No.1 analytical results for deep samples H702129 RT HICKS

Good Afternoon,

Just following up on my previous email. Please provide an updated work plan with required information as soon as possible. Closure request will not be approved without approval from BLM and NMOCD. Thank you.

Henryetta Price

Environmental Protection Specialist
Bureau Of Land Management
Hprice@blm.gov
Phone 575-234-5951

Cell 575-706-2780
Fax 575-234-5927

* Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.

On Tue, Aug 22, 2017 at 10:57 AM, Price, Henryetta <hprice@blm.gov> wrote:
Good Morning Mike,

I will still need to get a work plan submitted and approved by myself and NMOCD prior to closing this incident. Also, please provide an average water report that is approved by NMOCD. I will not accept the the prior work plan previously submitted due to the lack of provided information.

Henryetta Price

Environmental Protection Specialist
Bureau Of Land Management

[Hprice@blm.gov](mailto:hprice@blm.gov)

Phone 575-234-5951

Cell 575-706-2780

Fax 575-234-5927

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On Tue, Aug 22, 2017 at 10:16 AM, Mike Stubblefield <mike@rthicksconsult.com> wrote:
Mike,

R.T. Hicks consultants is sending the analytical results for samples collected from the disposal pit located at W.P. Sweat Sun Federal No.1 tank battery. The samples were collected from 10' below ground surface to 25' bgs utilizing a track hoe. The surface equipment will be removed from the tank battery by Friday. I will notify you before samples are collected from the impacted areas at the tank battery. A C-141 form for closure on the release located with-in the disposal pit which also will cover the other historic release areas on the tank battery site and the minor release outside of the battery area will then be submitted to NMOCD and BLM. A remediation plan will be attached to the C-141 form. Please contact me if further information is required.

Mike Stubblefield
R.T. Hicks Consultants
575-365-5034

Your message is ready to be sent with the following file or link attachments:

Sun Federal No.1 analytical results for deep samples H702129 RT HICKS

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Bratcher, Mike, EMNRD

From: Weaver, Crystal, EMNRD
Sent: Monday, September 11, 2017 2:00 PM
To: Randall Hicks; 'Price, Henryetta'; mike@rthicksconsult.com
Cc: Bratcher, Mike, EMNRD; 'BUDDY DELONG'; 'Kristin Pope'
Subject: RE: Emailing: Sun Federal No.1 analytical results for deep samples H702129 RT HICKS

Hello all,

A work plan will not be reviewed until all appropriate C-141 forms that were requested for this location have been received and processed.

Thank you,

Crystal Weaver

Environmental Specialist
OCD – Artesia District II
811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
Cell: 575-840-5963
Fax: 575-748-9720

From: Randall Hicks [mailto:r@rthicksconsult.com]
Sent: Friday, September 1, 2017 3:09 PM
To: 'Price, Henryetta' <hprice@blm.gov>; mike@rthicksconsult.com
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; 'BUDDY DELONG' <BUDDY_DELONG@msn.com>; 'Kristin Pope' <kristin@rthicksconsult.com>
Subject: RE: Emailing: Sun Federal No.1 analytical results for deep samples H702129 RT HICKS

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Randall Hicks
R.T. Hicks Consultants
Cell: 505-238-9515
Office: 505-266-5004

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Cc: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD; BUDDY DELONG
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Hprice@blm.gov
Phone 575-234-5951
Cell 575-706-2780
Fax 575-234-5927

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We will chase that down. My guess is that the approval may have gone to the Operator and Mr. Sweatt may not have passed that information to Buddy Delong.

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Randall Hicks
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Good Morning,

I am going to go ahead and request that all requested information regarding this location is submitted within 10 working days. I will send out a written order due to the fact that we have not received the requested documentation (C141) and information within the work plan. Failure to provide all requested information by the abatement date will result in an Incidents of Non Compliance (INC). Failure to comply with the INC will result in financial penalties or assessments.

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Your message is ready to be sent with the following file or link attachments:

Sun Federal No.1 analytical results for deep samples H702129 RT HICKS

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Bratcher, Mike, EMNRD

From: Weaver, Crystal, EMNRD
Sent: Thursday, May 18, 2017 11:53 AM
To: Price, Henryetta; Bratcher, Mike, EMNRD
Subject: RE: Sweatt W J- Water disposal pit

Good morning Henryetta,

Sorry just getting back to you now on this one but we have had a lot of visitors (operators & contractors) here lately. Mike and I took a look at the tank battery site on Google Earth. We could see the pit that is on their pad for their battery that you are talking about. I was hoping that you have some pictures of it from when you conducted your site inspection that you might be able to share with us? If not I will try to go out tomorrow and take a look at it. After obtaining pictures, I will respond to your inspection with a notification from OCD that use of the disposal pit is to be ceased immediately and that OCD will require all proper steps be followed to remediate the site.

The spill that you cited 2RP-3242 has no follow through on it besides what you already have noted (just what is on the OCD website – Initial C-141 and note from Bill Sweat saying they would clean it up...). So I can concur with you in my response that OCD has received no further documentation on the release and that follow through is requested.

Thank you,

Crystal Weaver

Environmental Specialist
OCD – Artesia District II
811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
Cell: 575-840-5963
Fax: 575-748-9720

From: Price, Henryetta [mailto:hprice@blm.gov]
Sent: Monday, May 15, 2017 12:27 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Subject: Sweatt W J- Water disposal pit

Good Morning,

I drove by one of Sweatt's battery (Sun Fed Tank Batt) a week or so ago and found that there is an unlined disposal pit in use. There is a PVC pipe that runs from the open top tank to the disposal pit.

There was also a fire on or around 7/2/15 which I don't think was closed out. Dara, our temporary employee was handling this location and no follow up was completed. I don't know if any samples or closure was submitted to NMOCD.

API-30-015-05711 2RP-3242

Henryetta Price

Environmental Protection Specialist

Bureau Of Land Management

Hprice@blm.gov

Phone 575-234-5951

Cell 575-706-2780

Fax 575-234-5927

*Please remember that Lesser Prairie Chicken timing stipulations are in effect 01 Mar- 15 June
Annually

* Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.

Bratcher, Mike, EMNRD

From: Kristin Pope <kristin@rthicksconsult.com>
Sent: Friday, September 15, 2017 3:46 PM
To: hprice@blm.gov; Weaver, Crystal, EMNRD; Bratcher, Mike, EMNRD
Cc: mike@rthicksconsult.com; Randy Hicks; buddy_delong@msn.com
Subject: Sweat - Sun Fed #1 Remediation Plan
Attachments: SunFed1RemedPlan_complete.pdf

Crystal, Henryetta, and Mike,

Randy's Outlook isn't working smoothly today so I'm submitting the attached plan for him, on behalf of WJ Sweat. Please contact Randy with any questions. Thank you and have a good weekend.

Kristin Pope
R.T. Hicks Consultants
Carlsbad Field Office
575.302.6755

R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Since 1996
Artesia ▲ Carlsbad ▲ Durango ▲ Midland

September 15, 2017

Mr. Mike Bratcher
Ms. Crystal Weaver
New Mexico Oil Conservation Division
811 S. 1st Street
Artesia, NM 88210
Via E-Mail

Ms. Henryetta Price
Bureau of Land Management
620 E. Greene Street
Carlsbad, NM 88220
Via E-mail

RE: Sun Federal #1 Production Pit Remediation Plan and
Surface Restoration Plan

Dear Mr. Bratcher, Ms. Weaver, and Ms. Price:

On behalf of WJ Sweat (operator), Hicks Consultants submits the following:

- A Corrective Action Plan and C-141 form for the former production pit.
- A Surface Restoration Plan for the tank battery location, historic crude releases, and the debris associated with the heater treater lightning strike in accordance with the criteria of the surface owner (BLM)
- Presentation of data and interpretations to support proposed closure and restoration
- A sampling and analysis plan for additional characterization activities

Plate 1 shows the location of the site on a USGS topographic map and Plate 2 is an aerial image of the same area.

Hydrogeologic Setting and Natural Vegetation

The data presented below provide a background upon which stakeholders can make decisions regarding the environmental threat posed by the past authorized actions and more recent releases. To that end, our examination has found:

1. The depth to groundwater at the site is about (3440-3260=) 180 feet (Plate 3).
2. Groundwater flows from southwest to northeast based upon USGS well data from the Quartermaster/Rustler Formation that are shown on the map.
3. Plate 3 also shows that the Permian Quartermaster/Rustler Formation is exposed slightly more than a mile west of tank battery and eolian dune sand is mapped in the area of the site.
4. The Permian outcrop extends to the north and west and probably underlies the potash mine tailings pond, which is visible to the northwest from the Sun Federal #1 location. This unlined tailings pond, which has held saturated brine for many decades, lies less than 3.5 miles directly down gradient with respect to groundwater flow.

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5. Older alluvium is the maroon outcrop pattern shown on Plate 3 and may underlie the dunes observed in the area of the tank battery. The alluvium in the drainage in which the tailings pond lies would also receive seepage of brine from the pond.
6. The Quartermaster Formation is dominated by silty sandstones and siltstones. The sandstone beds of the Quartermaster may be the saturated unit from which stock and domestic wells located southeast and east of the Sun Federal #1 draw water. Alternatively, these wells may draw water from the underlying Rustler.
7. There are no down-gradient wells between the Sun Federal battery and the tailings pond aside from one oilfield supply well measured by Hicks Consultants in 2014. As I recall, the well consisted of above-ground metal casing and groundwater elevation was recorded at 3201 feet ASL (Plate 3). We have not visited the well since then and are unsure if it still exists.
8. Plate 4 shows that the nearest surface water and mapped watercourses are about 1 mile northwest of the site. The potash tailings pond is visible in the northwest corner of this Plate.
9. The surface near the battery is characterized by low sand dunes that are stabilized by shinnery oak, shrubs and grass.

Authorized Waste Disposal and Operational Data

Past actions authorized by OCD Rules created conditions at the Sun Federal #1 battery and nearby oil and gas wells that are now considered environmental threats. We understand that a primary reason that discharge of produced water to unlined production pits in this field was allowed until the late 1990s and early 2000s is the proximity of the unlined potash tailings pond to the west. Plate 3 suggests that tailings pond overlies the recharge area (outcrop) of the Permian rocks that are the source of groundwater in the area as well as the shallow alluvium within the drainage. Plate 3 also suggests brine water seeping from the tailings pond into underlying rock units moves to the southwest. In the alluvium, seepage would move downhill/down gradient to the southeast toward Hackberry Lake, thus, one can expect saline groundwater beneath and down gradient of the tailings pond.

Below is pertinent operational data that provide additional background to stakeholders.

- The Sun Federal #1 well was drilled in late 1961 and went into production early in 1962
- When the well began production, all produced water was discharged to a unlined production pit, which was an allowable practice at the time
- All wells and batteries in this area maintained unlined produced water pits for many decades – probably to the late 1990s
- In April of 1986, WJ Sweatt took over operations of this well from Mewbourne Oil. At this time, production pits for all wells in this area continued to receive produced water.
- The files show that OCD inspected the well (and presumably the battery) in 2005 and issued a notice of violation due to the lack of signage for the well. No mention of the production pit is found in the OCD on-line files. Presumably OCD and BLM inspected the well and battery numerous times over the past several decades.

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- Upon notification by BLM in late 2016 that the unlined produced water disposal pit was not authorized, WJ Sweat ceased discharge into the pit.
- The unlined potash tailings pond that lies down gradient with respect to groundwater has not been restored and would continue to be a groundwater recharge area to underlying sediments and rocks.

Discussion of Data and Conclusions

Authorized disposal of produced water in the unlined production pit occurred from the 1960s to the early 2000s. This same authorized practice occurred throughout the oil field. Concurrently, the unlined potash tailings pond has caused seepage to the subsurface for many decades and continues to do so. With respect to groundwater flow, the seepage of brine from the tailings pond to the subsurface occurs directly down gradient of the Sun Federal #1 battery and other batteries in the oil field.

These data permit a conclusion that threats to groundwater quality in the area are the unlined potash tailings pond, which operates in compliance with New Mexico Rules, and past actions in the oil field that were authorized by OCD. Compared to these other sources, the contribution of the unauthorized discharge to the Sun Federal #1 pit is so small as to be nil.

Proposed Corrective Action Plan for Production Pit

Characterization of Former Unlined Production Pit

To provide site-specific data suitable for a remediation plan under Part 29 of OCD Rules, Hicks Consultants conducted the following work elements.

Work elements and observations of August 2, 2017

1. Excavators were used to move and stockpile soil on the east and west sides of the pit to facilitate collection of deep samples with the backhoe by allowing the backhoe to set up at the same level as the bottom of the pit. Stockpiles of clean material were staged to isolate the pit from run-on of stormwater.
1. With the backhoe at the same level as the bottom of the pit (2-3 feet bgs), excavation of a sampling trench found visually-impacted soil material to a depth of 10 feet bgs. The sides of the trench continuously collapsed into the excavation due to the presence of previously-discharge produced water and, perhaps, run-on from precipitation.
2. Because of the nature of the “flowing sands” and obvious hydrocarbon staining in the excavation, robust sampling and laboratory analyses to determine the extent of impairment to a depth of 10-12 feet was not necessary. The observations demonstrated that additional, deeper sampling would be appropriate. While samples were collected at two foot intervals by the backhoe, only three samples were evaluated in the laboratory (see Table 1 and Appendix A)
3. Excavated material from the sampling trench and adjacent to the pit was placed on a plastic liner pending the development of a corrective action plan.

On August 9, 2017, an excavator provided samples from beneath the production pit to a depth of 25 feet and the results of laboratory analysis are presented in Table 1 and Appendix A. We elected to evaluate samples for chloride as a conservative tracer to determine the

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vertical extent of impact by produced water. Observations of the physical nature of the samples (staining and odor) were sufficient to determine that impact by hydrocarbon present to total depth of the sampling trench.

Table 1 - Analytical Results Beneath Pit					
Sample Depth	Sampling Date	Chloride	BTEX	GRO+DRO	TPH
3	8/2/2017	1300	2.67	6204	7654
6	8/2/2017	1010	55.6	9560	11500
10	8/2/2017	848	20	4243	5009
10	8/9/2017	752			
15	8/9/2017	784			
20	8/9/2017	1520			
25	8/9/2017	1020			
Stockpile		304	ND	4100	5670

The data quality objectives (DQO) are geared to protect the root zone and re-vegetation of the site. The laboratory results relating to hydrocarbons are of academic and, perhaps, regulatory interest. This is because hydrocarbons degrade over time and do not pose a threat to vegetation provided that the hydrocarbons are disaggregated and mixed with the soil (to prevent formation of a hydrophobic, asphaltic layer) or are buried beneath the root zone. Thus, laboratory evaluation of hydrocarbon concentrations at this site provide no environmental value. Chloride, as a surrogate for salt, is another matter. Chloride concentrations in the root zone should be less than 600 mg/kg in order to ensure re-vegetation is not impeded. Thus, the DQO for chloride is reliable sampling and analysis to show average concentrations are below or above 600 mg/kg.

Additional sampling of the existing stockpile is warranted only if this material may be treated on site via root-zone flushing and phyto-remediation of hydrocarbons rather than off-haul to disposal. If on-site treatment is proposed, for this stockpile and any new stockpiles of equal size, we will

- Collect at least four (4) discrete samples using appropriate EPA field methods
- Evaluate all samples for chloride concentration in the field using the titration method described in Appendix B
- Submit at least 20% of the samples to a laboratory for analysis of chloride and/or TPH (GRO+DRO+MRO).

Proposed Corrective Action Plan to Restore Production Pit

The goal of the corrective action presented below is to prevent or significantly minimize migration of vadose zone water upward to the root zone. To accomplish this goal we propose the following, some of which is completed:

- A. Create a health and safety plan for the work described below.

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- B. Excavate visually-impacted material from beneath the former production pit to a depth of at least 4-feet below natural grade.
- C. Based upon physical characteristics, place impacted material in one stockpile and what appears to be clean material in a separate stockpile.
- D. Use physical observations during the excavation to determine the horizontal extent of impact of hydrocarbons to the depth of at least 4 feet. The excavation should extend 2-feet beyond the area of impact into clean earth material on all sides.
- E. Throughout the process, slope the sidewalls of the excavation as necessary to comply with any OSHA requirements.
- F. Compact and mound the footprint of the excavation bottom such that it would shed infiltrating water.
- G. Stop field work at this time to allow discussions/inspection with OCD and BLM.
- H. Over the sloped surface of impacted material and adjacent clean earth to extend 2 feet beyond the perimeter, place 20-mil, string-reinforced LLDPE liner.
- I. Over the liner, place 3 feet of clean excavated material plus 1-foot of earthen material that will support vegetation, which may be borrowed dune sand in this area.
- J. Seed the soil cover in accordance with instructions of the surface owner.

The stockpile(s) of impacted soil may be hauled to an authorized disposal site (e.g. R360). If chloride content is sufficiently low (as the analysis of the current stockpile suggest, see Table 1) and the costs of an alternative to haul-off are favorable, the earth material impacted by hydrocarbons and produced water might be employed in the proposed surface restoration plan outlined below. The decision to recycle the impacted soil via phyto-remediation will be determined after consultation with the surface owner and OCD. If recycling of the stockpile is considered as part of the surface restoration plan, we will obtain five discrete samples from the stockpile for field titration of chloride then, if warranted, laboratory analysis of TPH.

Neither removal of the impacted material to a landfill nor implementation of recycling via phyto-remediation will be implemented without approval by OCD and BLM.

Proposed Surface Restoration Plan

Sampling and Analysis Plan to Address Surface Spills and Surface Impacts at the Battery, Flowline, and Sun Federal #1 Well Site

The debris pile associated with the destruction of the heater treater will be removed for appropriate disposal by the operator. As this pile will not remain on site, sampling is not required.

Sampling of the site to guide a surface restoration program will be performed as follows after oilfield equipment has been removed from the tank battery:

- I. On an aerial photograph, map the horizontal extent of stained soil using GPS and submit this image to BLM and OCD. Characterization of the area within the fence of the tank battery will require at least 6 sample locations.
- II. Contact BLM and OCD to discuss the proposed sampling locations prior mobilizing equipment to the site and address questions and comments.

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- III. After approval of the locations by BLM and OCD, use backhoe trenches to collect samples for vertical characterization below each area of stained soil within the battery location and in other release locations previously identified by BLM. Collect samples at 2, 4 and 6 feet below grade at sufficient locations to characterize the release(s). Appendix C presents the SOP for soil sampling with a backhoe or excavator.
- IV. In addition to any field titration for chloride, submit selected samples to the laboratory for analysis of chloride and TPH (GRO+DRO+MRO).

Presumptive Remedy

After sampling and receipt of analyses, submit results to BLM with a copy to OCD along with an estimate of the volume of impacted material. Discuss the next steps with BLM and OCD for surface restoration. The economics of various remedies will be a determining factor of the final plan. The presumptive remedy is presented below for purposes of discussion, to define the DQOs, and to focus the proposed characterization effort.

Use a backhoe to create phyto-remediation cells at each spill site and within the fenced battery location (potentially including any stockpiled, impacted material excavated from the production pit) by

- a. blending the uppermost 12-24 inches of each spill footprint to break-up any asphaltic hardpan and increase soil/sand permeability
- b. Constructing 6-12 inch berms of clean material around each blended cell and compact the berms with the backhoe bucket to minimize run-off and spreading of the disaggregated and blended material.
- c. If sampling results shows that salt concentrations are too high to permit re-vegetation immediately, provide a monitoring plan to measure natural flushing of salt to below the root zone (4-feet). After salt concentrations will permit re-vegetation and attendant phytoremediation of hydrocarbons, proceed to the next step
- d. If salt concentrations are sufficiently low, seed the blended area with a mix approved by the BLM and monitor re-growth over two years

As described above, the DQO for chloride is reliable sampling and analysis to show average concentrations are below or above 600 mg/kg. The DQO for hydrocarbons is the physical disaggregation of the released crude such that an asphaltic cover does not occur and impede revegetation.

Schedule of Implementation

We will implement the following after written approval from OCD or BLM:

- Remove existing equipment from the tank battery location
- Remove and dispose of debris associated with heater treater lightning strike
- Complete work elements A-F of the production pit Corrective Action Plan
- Complete work elements I-IV of the Surface Restoration Plan

Within 30 days after consultation with BLM and OCD and approval of this plan or any addendum, we will implement the following:

- Complete work elements G-J of the production pit Corrective Action Plan

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- Either
 - Haul impacted earth material from the production pit excavation to disposal or
 - Incorporate this material into a surface restoration plan approved by the surface owner

Please contact me or Mike Stubblefield if you have any questions or concerns. Mike will be implementing the program in the field with assistance as required from myself and Kristin Pope.

Sincerely,

R. T. Hicks Consultants

A handwritten signature in black ink, appearing to read "Randall Hicks", written in a cursive style.

Randall Hicks
Principal

Enclosures: C-141 form, plates, appendices as stated

Copy: WJ Sweatt
Buddy DeLong

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised April 3, 2017
Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

Release Notification and Corrective Action**OPERATOR**☒ Initial Report ☐ Final Report

Name of Company WJ Sweatt	Contact Bill Sweat
Address PO BOX 827, Artesia, NM 88210	Telephone No. 575-365- 6807
Facility Name Sun Federal #1 Battery	Facility Type Production Pit

Surface Owner United States (BLM)	Mineral Owner United States	API No. 30-15-05711
-----------------------------------	-----------------------------	---------------------

LOCATION OF RELEASE

Unit Letter L	Section 20	Township 19S	Range 31E	Feet from the	North/South Line	Feet from the	East/West Line	County Eddy
------------------	---------------	-----------------	--------------	---------------	------------------	---------------	----------------	----------------

Latitude 32.643563 Longitude -103.986266 NAD83 (Google Earth)

NATURE OF RELEASE

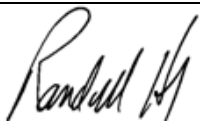
Type of Release Seepage from previously-authorized production pit	Volume of Release Unknown	Volume Recovered 0
Source of Release Seepage from unlined production pit	Date and Hour of Occurrence 1962-present	Date and Hour of Discovery
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*
Upon notice by BLM, the operator ceased discharges to the production pit

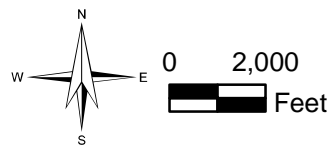
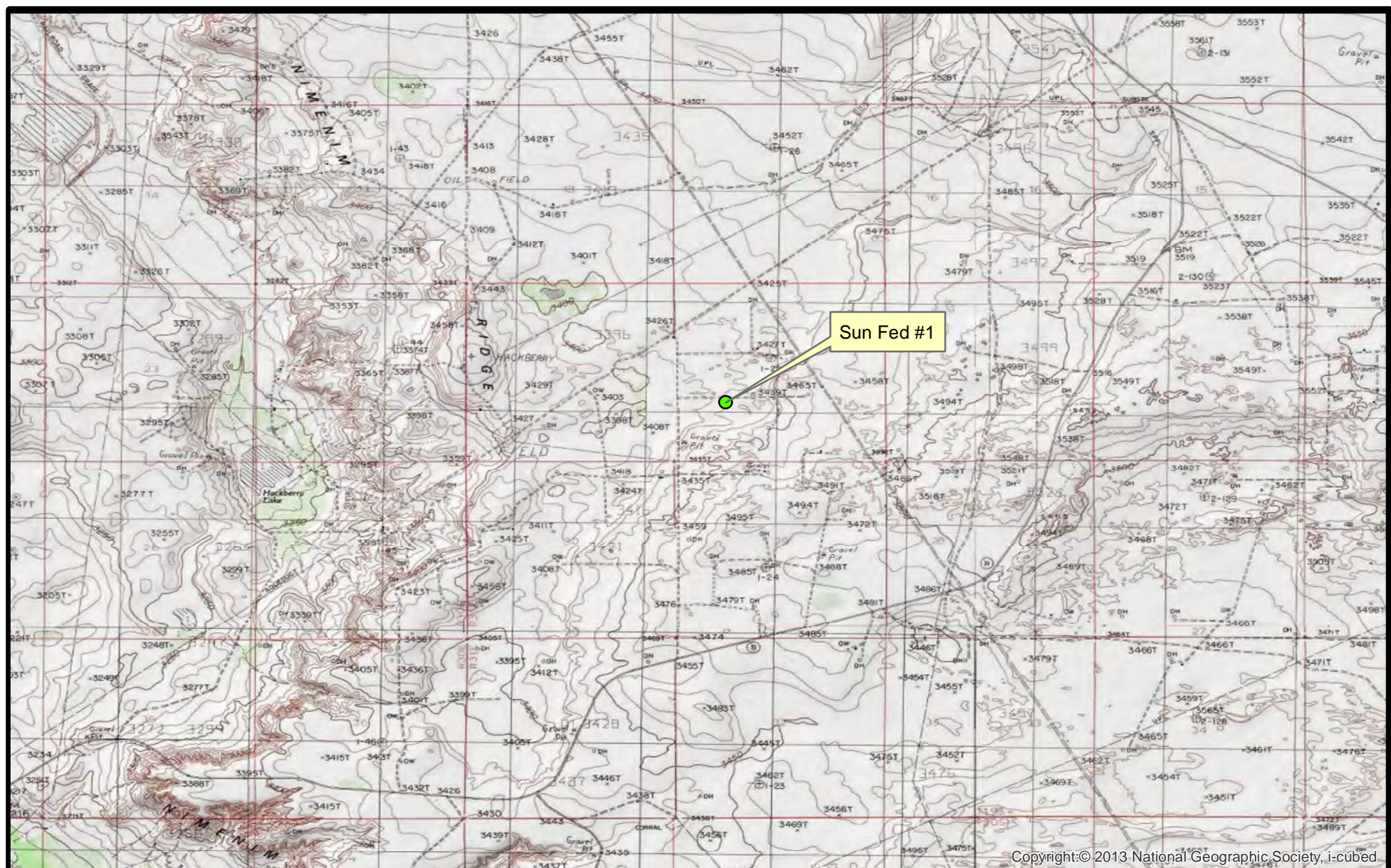
Describe Area Affected and Cleanup Action Taken.*
The attached Remediation Plan calls for additional investigation, closure, and surface restoration of the tank battery, and in-place closure of the pit.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	OIL CONSERVATION DIVISION		
Printed Name: Randall Hicks	Approved by Environmental Specialist:		
Title: Agent	Approval Date:	Expiration Date:	
E-mail Address: r@rthicksconsult.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: September 15, 2017	Phone: (505) 238-9515		

* Attach Additional Sheets If Necessary

Plates 1-4



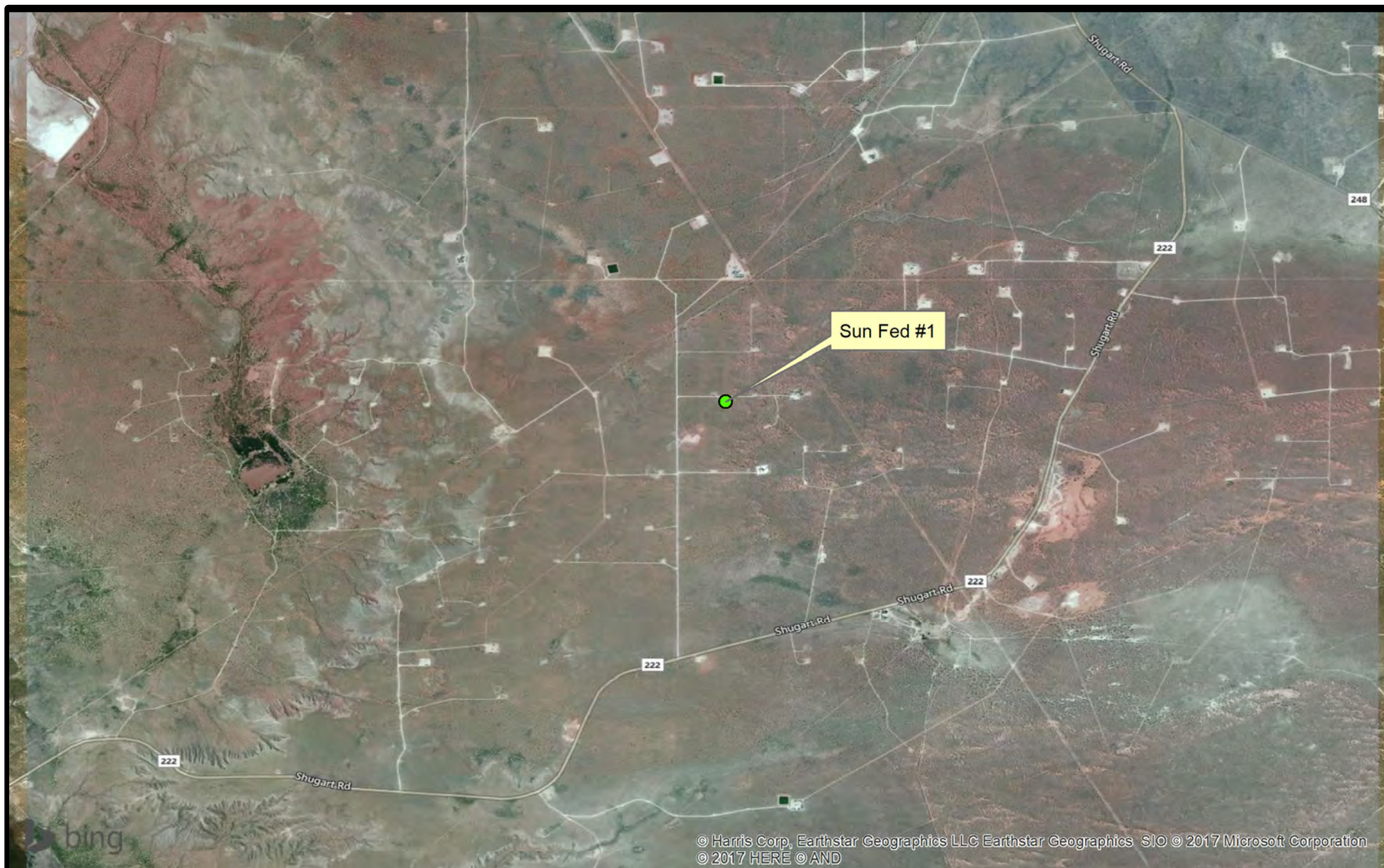
R.T. Hicks Consultants, Ltd
901 Rio Grande Blvd NW Suite F-142
Albuquerque, NM 87104
Ph: 505.266.5004

Topographic Map

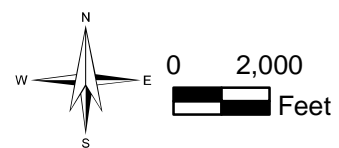
Plate 1

Sweatt - Sun Federal #1

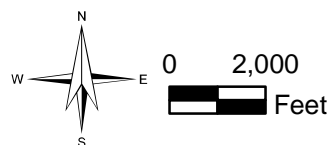
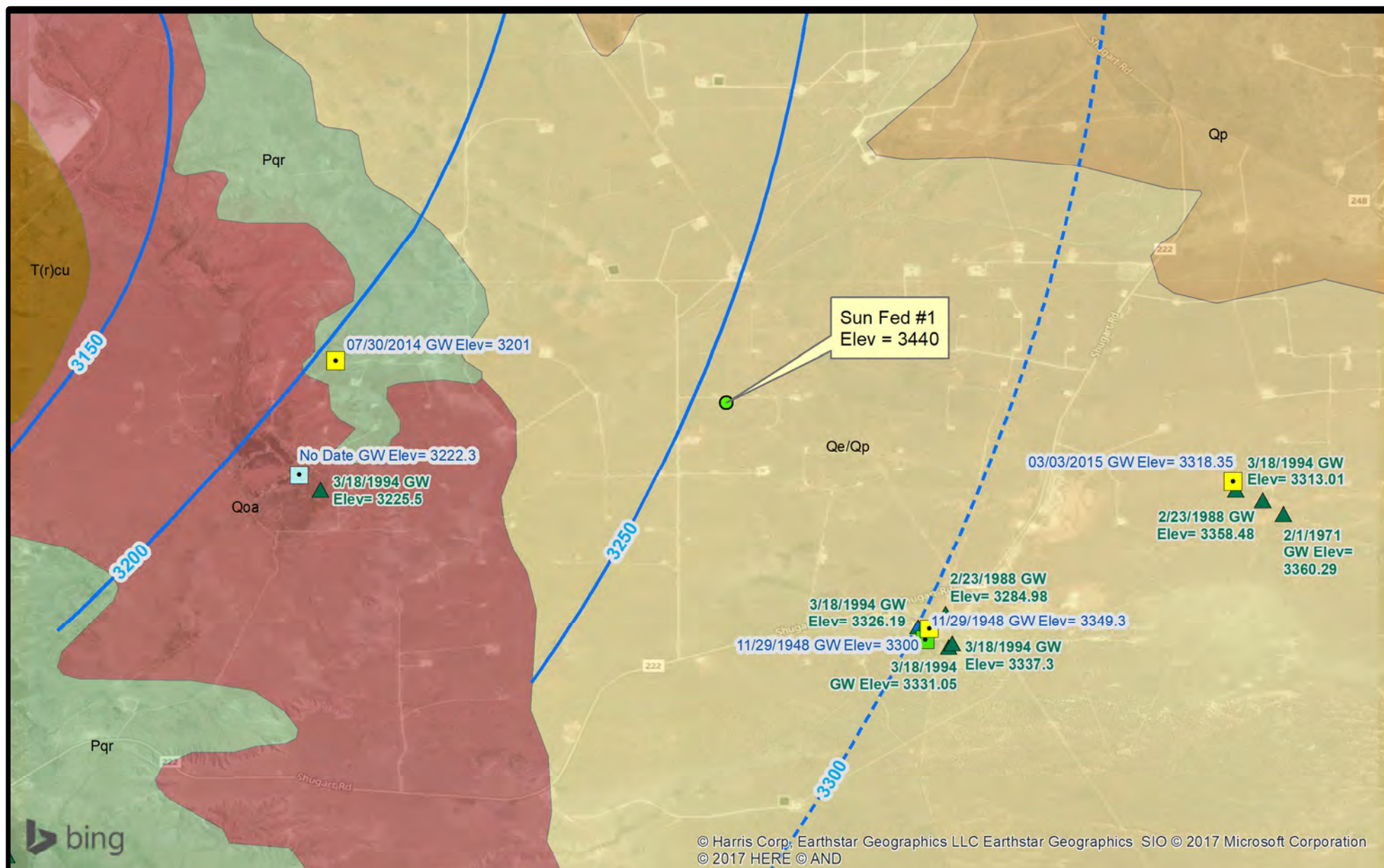
Sept 2017



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© 2017 HERE © AND



R.T. Hicks Consultants, Ltd 901 Rio Grande Blvd NW Suite F-142 Albuquerque, NM 87104 Ph: 505.266.5004	Air Photograph	Plate 2
	Sweatt - Sun Federal #1	Sept 2017



R.T. Hicks Consultants, Ltd
901 Rio Grande Blvd NW Suite F-142
Albuquerque, NM 87104
Ph: 505.266.5004

Geology and Groundwater Elevation

Plate 3

Sweatt - Sun Federal #1

Sept 2017

Legend**Potentiometric Surface
(Feet MSL)**

- Inferred Isocontour
— Isocontour

USGS Gauging Station (GW Elev, Date)**Aquifer Code, Well Status**

- ▲ Rustler

NM Geology**Map Unit, Description**

- Pqr, Paleozoic-Quartermaster and Rustler Formations; Upper Permian
■ Pr, Paleozoic-Ruster Formation; siltstone, gypsum, sandstone, and dolomite; Upper Permian
■ Qe/Qp, Quaternary-Eolian Piedmont Deposits
■ Qoa, Quaternary-Older Alluvial Deposits
■ Qp, Quaternary-Piedmont Alluvial Deposits
■ Qpl, Quaternary-Lacustrine and Playa Deposits
■ T(r)cu, Triassic-Upper Chinle Group

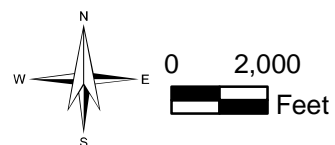
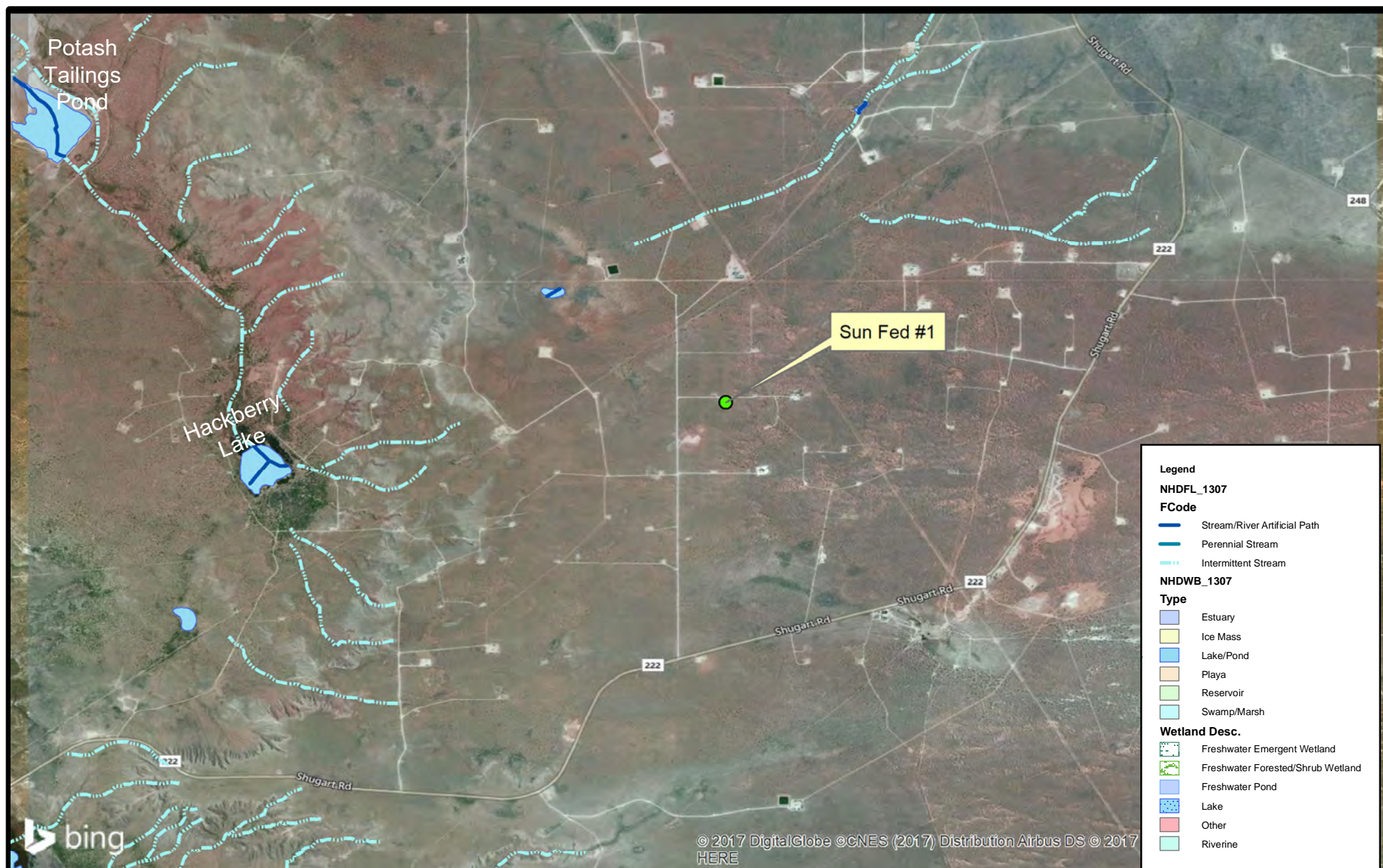
R.T. Hicks Consultants, Ltd
901 Rio Grande Blvd NW Suite F-142
Albuquerque, NM 87104
Ph: 505.266.5004

Geology and Groundwater Elevation

Sweatt - Sun Federal #1

Plate 3
LEGEND

Sept 2017



R.T. Hicks Consultants, Ltd
901 Rio Grande Blvd NW Suite F-142
Albuquerque, NM 87104
Ph: 505.266.5004

Surface Water, Wetlands and Mapped Watercourses

Plate 4

Sweatt - Sun Federal #1

Sept 2017

Appendix A

Laboratory Reports



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

August 11, 2017

MIKE STUBBLEFIELD

R T HICKS CONSULTANTS

901 RIO GRANDE BLVD SUITE F-142

ALBUQUERQUE, NM 87104

RE: SUN FEDERAL #1

Enclosed are the results of analyses for samples received by the laboratory on 08/03/17 15:35.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
 MIKE STUBBLEFIELD
 901 RIO GRANDE BLVD SUITE F-142
 ALBUQUERQUE NM, 87104
 Fax To: NONE

Received:	08/03/2017	Sampling Date:	08/03/2017
Reported:	08/11/2017	Sampling Type:	Soil
Project Name:	SUN FEDERAL #1	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	NOT GIVEN		

Sample ID: BH -1 0' (H702042-01)

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/10/2017	ND	2.03	102	2.00	1.52	
Toluene*	<0.050	0.050	08/10/2017	ND	1.88	94.1	2.00	0.520	
Ethylbenzene*	<0.050	0.050	08/10/2017	ND	1.93	96.7	2.00	0.352	
Total Xylenes*	<0.150	0.150	08/10/2017	ND	5.84	97.4	6.00	0.213	
Total BTEX	<0.300	0.300	08/10/2017	ND					

Surrogate: 4-Bromofluorobenzene (PID) 101 % 72-148

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	688	16.0	08/09/2017	ND	464	116	400	7.14		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<100	100	08/08/2017	ND	173	86.6	200	3.06	
DRO >C10-C28	3360	100	08/08/2017	ND	175	87.5	200	4.21	QM-07, QR-03
EXT DRO >C28-C36	859	100	08/08/2017	ND					

Surrogate: 1-Chlorooctane 73.6 % 28.3-164

Surrogate: 1-Chlorooctadecane 140 % 34.7-157

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
 MIKE STUBBLEFIELD
 901 RIO GRANDE BLVD SUITE F-142
 ALBUQUERQUE NM, 87104
 Fax To: NONE

Received: 08/03/2017
 Reported: 08/11/2017
 Project Name: SUN FEDERAL #1
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 08/03/2017
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Tamara Oldaker

Sample ID: BH -1 3' (H702042-03)

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.200	0.200	08/10/2017	ND	2.03	102	2.00	1.52	
Toluene*	<0.200	0.200	08/10/2017	ND	1.88	94.1	2.00	0.520	
Ethylbenzene*	<0.200	0.200	08/10/2017	ND	1.93	96.7	2.00	0.352	
Total Xylenes*	2.67	0.600	08/10/2017	ND	5.84	97.4	6.00	0.213	
Total BTEX	2.67	1.20	08/10/2017	ND					

Surrogate: 4-Bromofluorobenzene (PID) 136 % 72-148

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	1300	16.0	08/09/2017	ND	464	116	400	7.14		

TPH 8015M		mg/kg		Analyzed By: MS					S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	404	100	08/08/2017	ND	173	86.6	200	3.06		
DRO >C10-C28	5800	100	08/08/2017	ND	175	87.5	200	4.21		
EXT DRO >C28-C36	1450	100	08/08/2017	ND						

Surrogate: 1-Chlorooctane 98.5 % 28.3-164

Surrogate: 1-Chlorooctadecane 164 % 34.7-157

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
 MIKE STUBBLEFIELD
 901 RIO GRANDE BLVD SUITE F-142
 ALBUQUERQUE NM, 87104
 Fax To: NONE

Received: 08/03/2017
 Reported: 08/11/2017
 Project Name: SUN FEDERAL #1
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 08/03/2017
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Tamara Oldaker

Sample ID: BH -1 6' (H702042-05)

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<1.00	1.00	08/10/2017	ND	2.03	102	2.00	1.52	
Toluene*	3.81	1.00	08/10/2017	ND	1.88	94.1	2.00	0.520	
Ethylbenzene*	14.5	1.00	08/10/2017	ND	1.93	96.7	2.00	0.352	
Total Xylenes*	37.2	3.00	08/10/2017	ND	5.84	97.4	6.00	0.213	
Total BTX	55.6	6.00	08/10/2017	ND					

Surrogate: 4-Bromofluorobenzene (PID) 112 % 72-148

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	1010	16.0	08/09/2017	ND	464	116	400	7.14		
TPH 8015M		mg/kg		Analyzed By: MS						S-06

TPH 8015M	mg/kg		Analyzed By: MS					S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	1750	100	08/08/2017	ND	173	86.6	200	3.06	
DRO >C10-C28	7810	100	08/08/2017	ND	175	87.5	200	4.21	
EXT DRO >C28-C36	1940	100	08/08/2017	ND					

Surrogate: 1-Chlorooctane 165 % 28.3-164

Surrogate: 1-Chlorooctadecane 201 % 34.7-157

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
 MIKE STUBBLEFIELD
 901 RIO GRANDE BLVD SUITE F-142
 ALBUQUERQUE NM, 87104
 Fax To: NONE

Received: 08/03/2017
 Reported: 08/11/2017
 Project Name: SUN FEDERAL #1
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 08/03/2017
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Tamara Oldaker

Sample ID: BH -1 10' (H702042-07)

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.500	0.500	08/04/2017	ND	2.27	113	2.00	1.36	
Toluene*	<0.500	0.500	08/04/2017	ND	2.10	105	2.00	0.0527	
Ethylbenzene*	7.60	0.500	08/04/2017	ND	2.19	110	2.00	1.11	
Total Xylenes*	12.2	1.50	08/04/2017	ND	6.57	109	6.00	0.942	
Total BTEx	20.0	3.00	08/04/2017	ND					

Surrogate: 4-Bromofluorobenzene (PID) 112 % 72-148

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	848	16.0	08/04/2017	ND	432	108	400	3.64		

TPH 8015M	mg/kg	Analyzed By: MS						S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	633	50.0	08/04/2017	ND	188	94.2	200	2.39	
DRO >C10-C28	3610	50.0	08/04/2017	ND	194	97.0	200	2.57	
EXT DRO >C28-C36	766	50.0	08/04/2017	ND					

Surrogate: 1-Chlorooctane 135 % 28.3-164

Surrogate: 1-Chlorooctadecane 161 % 34.7-157

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Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

S-06	The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
S-04	The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
QR-03	The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to matrix interference. QC batch accepted based on LCS and/or LCSD recovery and/or RPD values.
QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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A handwritten signature in black ink, appearing to read "Celey D. Keene", is written over a horizontal line.

Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

BILL TO

ANALYSIS REQUEST

Company Name:	R.T. Hedges Construction	P.O. #:	
Project Manager:	Mike Stoddard	Company:	Antonia Construction
Address:	2411 S. 15th	Attn:	Construction
City:	Alameda	State:	NM
Phone #:	505-365-5054	Fax #:	
Project #:		City:	San Juan
Project Name:	San Federal No. 1	State:	Zip:
Project Location:		Phone #:	
Sample Name:	Mike Stoddard	Fax #:	

FOR LAB USE ONLY		1	
Lab I.D.	Sample I.D.		
H702042			
1	BH-1 0'	(G)RAB OR (C)OMP.	
2	BH-1 1'	# CONTAINERS	
3	BH-1 3'	GROUNDWATER	
4	BH-1 4'	WASTEWATER	
5	BH-1 6'	SOIL	
6	BH-1 8'	OIL	
7	BH-1 10'	SLUDGE	
		OTHER :	
		ACID/BASE:	
		ICE / COOL	
		OTHER :	
		DATE	TIME
		8/3/17	12:35
		8/3/17	12:30
		8/3/17	12:40
		8/3/17	12:45
		8/3/17	12:50
		8/3/17	1:00
		8/3/17	1:15
		8015M TPH	
		8021B BTEX	
		Total Chloride	
		Hold	

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Relinquished By:	Date:	Received By:	Date:
Mike Stoddard	8-3-17	Antonia Construction	8-3-17
Time:	Time:	Sample Condition	CHECKED BY:
	3:35	Cool <input type="checkbox"/> Intact <input type="checkbox"/>	(Initials)
Delivered By: (Circle One)	17.8	Yes <input type="checkbox"/> No <input type="checkbox"/>	YES
Sampler - UPS - Bus - Other:	Consolidated 18.052	Yes <input type="checkbox"/> No <input type="checkbox"/>	YES

Remarks: Push - BTEX + CL on #7 only
Held - 1-6.
Brought directly to lab from field
Email to Randy@RTHedges.com



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

August 17, 2017

MIKE STUBBLEFIELD

R T HICKS CONSULTANTS

901 RIO GRANDE BLVD SUITE F-142

ALBUQUERQUE, NM 87104

RE: SUN FEDERAL #1

Enclosed are the results of analyses for samples received by the laboratory on 08/11/17 16:20.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
 MIKE STUBBLEFIELD
 901 RIO GRANDE BLVD SUITE F-142
 ALBUQUERQUE NM, 87104
 Fax To: NONE

Received:	08/11/2017	Sampling Date:	08/09/2017
Reported:	08/17/2017	Sampling Type:	Soil
Project Name:	SUN FEDERAL #1	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	NOT GIVEN		

Sample ID: BH-1 10' (H702129-01)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	752	16.0	08/17/2017	ND	400	100	400	3.92	

Sample ID: BH-1 15' (H702129-02)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	784	16.0	08/17/2017	ND	400	100	400	3.92	

Sample ID: BH-1 20' (H702129-03)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1520	16.0	08/17/2017	ND	400	100	400	3.92	

Sample ID: BH-1 25' (H702129-04)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1020	16.0	08/17/2017	ND	400	100	400	3.92	

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

R T HICKS CONSULTANTS
 MIKE STUBBLEFIELD
 901 RIO GRANDE BLVD SUITE F-142
 ALBUQUERQUE NM, 87104
 Fax To: NONE

Received: 08/11/2017
 Reported: 08/17/2017
 Project Name: SUN FEDERAL #1
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 08/09/2017
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Tamara Oldaker

Sample ID: S-2 STOCKPILED SOIL (H702129-05)

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/15/2017	ND	1.77	88.7	2.00	2.16	
Toluene*	<0.050	0.050	08/15/2017	ND	1.68	83.8	2.00	1.72	
Ethylbenzene*	<0.050	0.050	08/15/2017	ND	1.75	87.5	2.00	1.81	
Total Xylenes*	<0.150	0.150	08/15/2017	ND	5.26	87.7	6.00	1.90	
Total BTX	<0.300	0.300	08/15/2017	ND					

Surrogate: 4-Bromofluorobenzene (PID) 104 % 72-148

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	304	16.0	08/17/2017	ND	400	100	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS				S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<50.0	50.0	08/15/2017	ND	212	106	200	0.639	
DRO >C10-C28	4100	50.0	08/15/2017	ND	211	105	200	1.44	
EXT DRO >C28-C36	1570	50.0	08/15/2017	ND					

Surrogate: 1-Chlorooctane 69.5 % 28.3-164

Surrogate: 1-Chlorooctadecane 182 % 34.7-157

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Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

S-06	The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

Company Name: R.E. Hicks Consulting		P.O. #:		BILL TO		ANALYSIS REQUEST	
Project Manager: Mike Stubbins		Company: Sweet					
Address: 24115, 1st Street		Attn: Mike Hicks					
City: Arlene		Address:					
State: NM zip: 8820		City:					
Phone #: 505.868.034		Fax #:					
Project #: 505.868.034		State: NM Zip: 8820					
Project Name: Sun Federal Hwy Tan 11		City: San Francisco					
Project Location: Sun Federal Hwy Tan 11		State: NM Zip: 8820					
Sampler Name: Mike Stubbins		Fax #:					
FOR LAB USE ONLY		PRESERV		SAMPLING			
Lab I.D. HT02128		Sample I.D.					
(G)RAB OR (C)OMP. # CONTAINERS GROUNDWATER WASTEWATER SOIL OIL SLUDGE OTHER :		ACID/BASE: ICE / COOL OTHER :		DATE		TIME	
				8/9/10		3:09P	
1 BH-1 10' 2 BH-1 15' 3 BH-1 20' 4 BH-1 25' 5.2 Stockpiled soil		<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>		<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>		Total chloride 4500 8015M TPH 8021R BTEX	
Relinquished By: Mike Stubbins Date: 8-11-17 Time: 4:20		Received By: Guerra Delacruz Date: 8-11-17 Time: 4:20		REMARKS:			
Delivered By: (Circle One) 7.32 Sampler - UPS - Bus - Other: Collected 7.55		Sample Condition Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		CHECKED BY: TE: #75			

Appendix B

Chloride Field Test Protocol

R.T. HICKS CONSULTANTS, LTD.

FIELD PROCEDURE

Chloride Titration Using 0.282 Normal Silver Nitrate Solution

1.0 Purpose

This procedure is to be used to determine the concentration of chloride in soil and other solids (e.g. drilling waste).

2.0 Scope

This procedure is to be used as the standard field measurement for soil chloride concentrations.

3.0 Sample Collection and Preparation

- 3.1 Collect at least 80 grams of soil from the sample collection point. Take care to ensure that the sample is representative of the general area of concern to include visible concentrations of hydrocarbons and soil types. If necessary, prepare a composite sample for soils obtained at several points in the sample area.
- 3.2 The soil sample(s) shall be immediately inserted into a one-quart or larger polyethylene freezer bag. Care should be taken to insure that no cross-contamination occurs between the soil sample and the collection tools or sample processing equipment.
- 3.3 The sealed sample bag should be massaged to break up any clods.

4.0 Sample Preparation

- 4.1 Tare a clean glass vial having a minimum 40 ml capacity. Add at least 10 grams of the soil sample and record the weight.
- 4.2 Add at least 10 grams of reverse osmosis water or distilled water to the soil sample and shake or agitate for 20 seconds.
- 4.3 Allow the sample to set for a period of 5 minutes or until the separation of soil and water.
- 4.4 Carefully pour the free liquid extract from the sample, through a paper filter if necessary, into a clean plastic cup.

5.0 Titration Procedure

- 5.1 Using a graduated pipette, remove 10 ml extract and dispense into a clean plastic cup.

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- 5.2 Add 2-3 drops potassium chromate (K_2CrO_4) to mixture.
- 5.3 If the sample contains any sulfides (hydrogen or iron sulfides are common to oilfield soil samples) add 2-3 drops of hydrogen peroxide (H_2O_2) to mixture.
- 5.4 Using a 1 ml pipette, carefully add .282 normal silver nitrate (one drop at a time) to the sample while constantly agitating it. Stop adding silver nitrate when the solution begins to change from yellow to red. Be consistent with endpoint recognition.
- 5.5 Record the ml of silver nitrate used.

6.0 Calculation

To obtain the chloride concentration, insert measured data into the following formula:

$$\frac{.282 \times 35,450 \times \text{ml AgNO}_3}{\text{ml water extract}} \times \frac{\text{grams of water in mixture}}{\text{grams of soil in mixture}}$$

Using Step 5.0, determine the chloride concentration of the RO water used to mix with the soil sample. Record this concentration and subtract it from the formula results to find the net chloride in the soil sample.

Record all results on a field form.

Additional Notes

- 1) Make sure the scale is weighing in grams.
- 2) “Zero” the scale with clean, empty 40 ml container (including the cap) sitting on the scale.
- 3) Add 10 to 20 grams of sample soil to the container. Record the weight.
- 4) “Re-zero” the scale.
- 5) Add distilled water to almost fill the container. Record the weight.
- 6) Screw the cap on, and shake the container to thoroughly mix the sample with the distilled water. Set aside to allow settling of the sample. This will take only a few minutes for coarse grained material and up to 20 minutes for very fine grained sediments. The solution does not need to be perfectly clear to continue the procedure.
- 7) Add 3 drops of Potassium Chromate to a small, clean, plastic cup.
- 8) Extract 10 ml (using a large pipette – at least 10 ml) of solution from the sample container and put it into the plastic cup. Record ml of solution placed in the cup.
 - a. This can be kept track of by careful recording of “before” and “after” fluid levels in the pipette.
 - b. Or: Place the plastic cup on the scale with the potassium chromate and “zero” the scale. Add solution to the cup until 10 grams is indicated on the scale.
- 9) Swirl the solution and the potassium chromate to mix them.
- 10) Using a 1 ml pipette, add silver nitrate to the mixed solution drop by drop while swirling. The entire solution will change from a pale lemon yellow color to a brick red color when sufficient silver nitrate has been added. STOP when it all turns brick red. It does not need to be a deep brick red color. This will result in an overly high result. Record ml of silver nitrate used.
- 11) The chloride concentration of the sample is given by:

$$C_{\text{sam}} = (35,450 * 0.282) * \frac{(\text{grams of water})}{(\text{grams of soil})} * \frac{(\text{ml of silver nitrate})}{(\text{ml of solution})}$$

or:

$$C_{\text{sam}} = (9997) * \frac{(\text{grams of water (Step 5)})}{(\text{grams of soil (Step 3)})} * \frac{(\text{ml of silver nitrate (Step 10)})}{(\text{ml of solution (Step 8)})}$$

Units are: mg(of chloride)/kg(of soil)

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Equipment List:

Scale

10 ml pipettes

1 ml pipettes

Controllers for pipettes (small and large),

press pipette into open end (carefully)

40 ml sample containers

Small plastic cups

Silver Nitrate

Potassium Chromate

Distilled water

Waste container for final solution. A robust plastic jug with lid will do for field use.

DO NOT pour this down a drain. Dispose of with a chemical lab.

Waste bags for used plastic cups (rinse and pour rinsing fluid into robust jug)

Calculator

Nitrile gloves

Safety glasses

Paper towels

Safety Data

http://ptcl.chem.ox.ac.uk/~hmc/hsci/chemicals/silver_nitrate.html

http://ptcl.chem.ox.ac.uk/~hmc/hsci/chemicals/potassium_chromate.html

Appendix C

SOP for Field Sampling Using an Excavator

R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Since 1996
Artesia ▲ Carlsbad ▲ Durango ▲ Midland

September 3, 2017

Standard Operating Procedure for Soil Sampling from Test Pits

This document describes the procedures to be used when collecting soil samples using an excavator for the purpose of laboratory analysis. The reader should be familiar with relevant sections of the following document as it is the source of this field method:

Soil Sampling, SESDPROC-300-R3, USEPA, August 2014

<https://www.epa.gov/quality/soil-sampling>

The trenches created by a backhoe or excavator offer the capability of collecting samples from specific intervals and allow visual correlation with vertically and horizontally adjacent material. No sample will be collected by entering a trench deeper than 4 feet.

Data Quality Objectives and Quality Assurance protocols in the sampling plan must be followed. This method must be modified if concentrations of VOCs (e.g. benzene) are expected to be less than 0.2 mg/kg.

This SOP shall be submitted to the excavation contractor at least two work days prior to the scheduled date of sampling.

Field Method to Collect Samples from Excavator Bucket

1. This SOP is appended to the Health and Safety Plan associated with the field program.
2. Documentation of all sampling is required. Documentation includes, at a minimum
 - a. Photographs of each sample with location stamp on the image or within the electronic file of the photograph
 - b. Written notes in a field notebook that
 - i. Describe the sample in terms of texture, grain size, odor, moisture, color, etc.
 - ii. Correlate the name of the sample with location¹, depth, photograph number, date and time of sampling
 - iii. Describe any anomalies of sampling (e.g. excessive slough)
 - iv. Provide other useful information (e.g. split samples with others)
 - c. Chain of Custody forms tied to information in the field notebook
3. Inspect the backhoe or excavator to ensure the bucket is clean and free of grease or visual contamination. The intent of this sampling method is to avoid the need to decontaminate the bucket between sampling events.

¹ The name of the sample can be a location from a fixed point, such as 120N/30E. The fixed point should be well head, telephone pole, corner of a foundation or other feature that can be easily identified in the field and on a Google Earth image. Latitude and longitude are generally not adequate for sample locations as the accuracy of hand-held GPS can be plus/minus 20 feet. A cemented benchmark may be installed at the site if multiple sampling events are anticipated.

September 3, 2017

Page 2

4. Trenches for samples should proceed from the expected cleanest locations to the most impacted locations.
5. Place pre-labeled jars for the expected samples from the trench in a clean sample preparation area covered by a disposable drop cloth, inside the original container box, inside a zip-lock bag, or another secure and suitable protected location.
6. In general, samples should be obtained directly from the bucket in the following manner
 - a. Excavate the sampling trench to form two benches:
 - i. The upper bench is 0.5-1 foot above the proposed depth of sampling
 - ii. The lower bench is 1-2 feet below the upper bench and more distant from the equipment and will capture slough from the excavation and allow the operator to cut into the soil at the upper bench with greater accuracy
 - b. Cause the operator to clean slough from the upper bench and expose the earth material slightly above the desired sampling depth. Direct the operator with hand signals as necessary.
 - c. Direct the operator to remove a 0.5-1 foot layer of earth from the upper bench into the bucket and then to the ground surface
 - d. Examine the earth in the bucket and
 - i. Remove any slough and any smear from the bucket with a clean (decontaminated) trowel or knife to expose relatively undisturbed material
 - ii. Obtain samples of undisturbed material for VOCs (e.g. BTEX) first and non-volatile constituents in a separate container next²
 - iii. Do not obtain samples from within 1-inch of the bucket surface
 - iv. Label sample jars for depth and location then place in a cooler on ice in a separate zip-lock bag for each sample suite
 - v. Describe the material in the bucket with respect to grain size, color, odor, texture, etc.
 - vi. Obtain a reasonable close-up photograph of the material
 - e. Inspect the bucket to cause cleaning or decontamination as required to satisfy data quality objectives.
 - f. Dispose of the drop cloth, spilled material or other debris and recondition the sample preparation area with a clean drop cloth and the next set of labeled sample jars.
 - g. Repeat steps a-f for the next sampling depth

Some precision with respect to actual depth of the sample may be reduced with this method but if the soil to be sampled is uniquely distinguishable from the

² See preservation, container material and sample size requirements on the accompanying chart. The earth material must be packed into a single 2-oz. glass container with a screw cap and septum seal. The sample container must be filled quickly and completely to eliminate head space.

September 3, 2017

Page 3

adjacent or nearby soils, it is possible to adequately characterize the material as to location and depth.

If sampling for low concentrations of VOC (i.e. <0.2 mg/kg of benzene) special sampling containers, samplers and protocols are required.

Equipment Checklist

- Site-specific plans (e.g, Health and Safety and Sampling Plan)
- Plastic zip-top bags to hold samples in cooler
- Field logbook
- Personal protective clothing (see HASP)
- Indelible black ink pens and markers
- Plastic sheeting as drop cloth for sample preparation area and other uses
- Clear, waterproof tape to cover sample labels
- Disposable nitrile or appropriate gloves
- Appropriate sample containers with labels
- Bags of ice
- Decontamination supplies: three buckets, Simple Green detergent, Alconox or equivalent, fresh water, distilled water
- Chain of custody forms
- Wipes or paper towels
- Insulated cooler(s)
- Global Positioning System (GPS) unit (iPhone may be acceptable)
- >20-ft measuring tape
- Trash Bags
- Spoons and/or knives that can be completely decontaminated
- Monitoring/screening instruments as required by the health and safety plan

Bratcher, Mike, EMNRD

From: Price, Henryetta <hprice@blm.gov>
Sent: Monday, September 18, 2017 4:13 PM
To: Kristin Pope
Cc: Weaver, Crystal, EMNRD; Bratcher, Mike, EMNRD; mike@rthicksconsult.com; Randy Hicks; BUDDY DELONG
Subject: Re: Sweat - Sun Fed #1 Remediation Plan

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Henryetta Price

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Sent: Monday, October 2, 2017 9:21 AM
To: Bratcher, Mike, EMNRD; hprice@blm.gov; Randy Hicks; Weaver, Crystal, EMNRD; mike@rthicksconsult.com; buddy_delong@msn.com
Subject: RE: Sweat - Sun Fed #1 Remediation Plan

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From: "Bratcher, Mike, EMNRD" <mike.bratcher@state.nm.us>
Date: September 27, 2017 at 10:10:39 AM MDT
To: "Price, Henryetta" <hprice@blm.gov>, Kristin Pope <kristin@rthicksconsult.com>
Cc: "Weaver, Crystal, EMNRD" <Crystal.Weaver@state.nm.us>, "mike@rthicksconsult.com" <mike@rthicksconsult.com>, Randy Hicks <r@rthicksconsult.com>, BUDDY DELONG <buddy_delong@msn.com>
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NMOC District 2
811 South First Street
Artesia, NM 88210
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Randall Hicks
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Cell: 505-238-9515
Office: 505-266-5004

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Sent: Monday, October 02, 2017 9:21 AM
To: Mike Bratcher; hprice@blm.gov; Randy Hicks; Crystal Weaver; mike@rthicksconsult.com; buddy_delong@msn.com
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I would like to have the meeting just to clarify what has been done. and What will be done. I also want to make sure that we are all in agreement prior to moving forward. Hopefully this will be the last meeting for this location and we can close it out soon. Thank you for your patience and understanding.

My calendar is open all week and next week. The sooner the better is best I would think.

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From: Mike Stubblefield <mike@rthicksconsult.com>
Sent: Thursday, October 19, 2017 1:59 PM
To: Bratcher, Mike, EMNRD
Cc: Weaver, Crystal, EMNRD; 'Price, Henryetta'; 'Randall Hicks'; 'Kristin Pope'; 'BUDDY DELONG'
Subject: W.J. Sweat Sun Federal tank battery

Follow Up Flag: Follow up
Flag Status: Completed

Dear Mr. Mike Bratcher,

Sweat Construction willing be hauling the stockpiled material which was removed from the disposal pit located at the Sun Federal tank battery to landfill. After the stockpiled material has been removed from the tank battery site, the production equipment will then be relocated to the Sun Federal No.1 well site location. I will give a verbal notice to you on time and date for haul off actions. Please contact me or Kristen Pope if further information is required.

Mike Stubblefield
RT Hicks Consultants
Cell: 575-365-5034

Bratcher, Mike, EMNRD

From: Price, Henryetta <hprice@blm.gov>
Sent: Monday, October 23, 2017 9:41 AM
To: mike@rthicksconsult.com
Cc: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD; Randall Hicks; Kristin Pope; BUDDY DELONG
Subject: Re: W.J. Sweat Sun Federal tank battery

All,

Can we meet next week on Monday 30 Oct at 1pm at the NMOCD office in Artesia?

Henryetta Price

Environmental Protection Specialist
Bureau Of Land Management

[Hprice@blm.gov](mailto:hprice@blm.gov)

Phone 575-234-5951

Cell 575-706-2780

Fax 575-234-5927

On Thu, Oct 19, 2017 at 1:59 PM, Mike Stubblefield <mike@rthicksconsult.com> wrote:

Dear Mr. Mike Bratcher,

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Mike Stubblefield

RT Hicks Consultants

Cell: 575-365-5034

Bratcher, Mike, EMNRD

From: Kristin Pope <kristin@rthicksconsult.com>
Sent: Monday, October 23, 2017 10:07 AM
To: 'Price, Henryetta'; mike@rthicksconsult.com
Cc: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD; 'Randall Hicks'; 'BUDDY DELONG'
Subject: RE: W.J. Sweat Sun Federal tank battery

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Mike Stubblefield

RT Hicks Consultants

Cell: 575-365-5034

Bratcher, Mike, EMNRD

From: Weaver, Crystal, EMNRD
Sent: Friday, May 26, 2017 3:38 PM
To: Bratcher, Mike, EMNRD
Subject: FW: W J Sweatt * Sun Federal #1 * 30-015-05711

Buddy Delong gave me this email for a contact of Nancy Larson who works for Bill Sweatt construction as the company business administrator or something like that. I am going to try this lady instead of emailing Buddy about this stuff since he said he is only contracted as the pumper for Bill's locations.

From: BUDDY DELONG [mailto:buddy_delong@msn.com]
Sent: Friday, May 26, 2017 3:20 PM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Subject: Re: W J Sweatt * Sun Federal #1 * 30-015-05711

n.larson@sweattconstruction.com

Get [Outlook for Android](#)

From: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Sent: Tuesday, May 23, 2017 11:08:48 AM
To: buddy_delong@msn.com
Cc: Bratcher, Mike, EMNRD; Price, Henryetta; Jim Amos (jamos@blm.gov)
Subject: W J Sweatt * Sun Federal #1 * 30-015-05711

Hello Buddy,

First off OCD would like to concur with the BLM on this site.
A C-144 needs to be filled out regarding the unpermitted disposal pit and a remediation proposal for the pit needs to be turned in to the OCD no later than 6/2/17. A full delineation of this site will be required so please make sure to include that within your remediation proposal.

On the C-144 the first section on page one looks similar to this:

Type of action:

- Below grade tank registration
- Permit of a pit or proposed alternative method
- Closure of a pit, below-grade tank, or proposed alternative method
- Modification to an existing permit/or registration
- Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

**The fifth box of these choices needs to be marked, and following that section, all remaining areas of the form that are pertinent to this disposal pit remediation need to be filled out.

Please Note: Photos were taken by BLM on 5/4/17 of the Sun Federal #1 Tank Battery location where the unpermitted disposal pit exists, where the contaminated releases in the pasture area occurred and where dismantled equipment was

left. Those and any other spill areas are to be cleaned up to OCD rules and regulations standards and because they were identified by an environmental regulatory inspector it will now be required that a C-141 be submitted for these releases so that they may be tracked within the OCD data system. As BLM Environmental Protection Specialist, Henryetta Price, mentioned both the BLM and OCD will need to be notified once remediation procedures are being mobilized with 48 hours in advance so that both regulatory parties are able to consider being present on site.

It is OCD's understanding that a pre-existing spill had occurred at the Sun Federal #1 tank battery location back in 7/2015 and was given a case number of 2RP-3242. After the OCD received the initial C-141 and its attachments no other follow up documentation or update on status of this release was provided to the OCD. I have attached the initial C-141 and the said attachments that were sent in from the operator at the time of the spill's origination. A follow up of this release is also being requested at this time.

Thank you for your cooperation and if you have any questions or concerns please contact myself or Mr. Mike Bratcher at OCD Artesia District II Office.

Crystal Weaver

Environmental Specialist
OCD – Artesia District II
811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
Cell: 575-840-5963
Fax: 575-748-9720

From: Price, Henryetta [<mailto:hprice@blm.gov>]

Sent: Monday, May 15, 2017 4:07 PM

To: buddy_delong@msn.com

Cc: James Amos <James_Amos@blm.gov>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Subject: Sun Fed Tank Batt

Buddy,

Below are my inspection remarks for the above location. Sampling will occur within the impacted area and delineated in accordance within NMOCDD Guidelines. As mentioned earlier, we do not recommend dig and haul if we can address the impacts on location. This will depend on the amount of contaminants on location, depth to ground water, and proposed method. I am going to require that you give me 48 hours notice so that I am available for sampling. Thank you.

Inspection remarks:

Noticed some staining in the pasture east of the battery. Looks like a metal flow line had a leak and was fixed. No spills have been reported for that incident. Area impacted in the pasture was about 3x15ft. if not more. And another area approx. 5x8 ft in the pasture.

Cattle is present in the area. High recreation area.

Unapproved disposal pit is in use within the berm. PVC pipe runs from the open top tank into the disposal pit.

No requests or approval given for the pit.

Contaminated soils and dismantled gunbarrel just outside the battery and in the pasture.

Most of the contaminants within the berm from the reported EU on 7/2/15 have been removed from within the berm and placed outside the berm area.

No analyticals have been submitted. No work plan has been submitted or approved.

Closure report not received.

Called Sweatt about the location and current contact information. They will have until the end of the week to make contact with their pumper Buddy Delong who is their contact for this clean up. Otherwise INC will be issued. Recommend to have inspector present during sampling to ensure they are reporting/ and collecting samples correctly.

Henryetta Price

Environmental Protection Specialist

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*Please remember that Lesser Prairie Chicken timing stipulations are in effect 01 Mar- 15 June Annually

* Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.

Bratcher, Mike, EMNRD

From: Price, Henryetta <hprice@blm.gov>
Sent: Monday, October 23, 2017 10:21 AM
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Cc: mike@rthicksconsult.com; Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD; Randall Hicks; BUDDY DELONG
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Mike Stubblefield

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Thank you,

Crystal Weaver

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Cc: mike@rthicksconsult.com; Bratcher, Mike, EMNRD; 'Randall Hicks'; 'BUDDY DELONG'
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Thanks, Crystal. We'll plan on meeting in your office next Monday. If y'all think a field trip would be better, let us know. Thanks.

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Subject: RE: W.J. Sweat Sun Federal tank battery

Follow Up Flag: Follow up
Flag Status: Completed

Good morning all,

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Otherwise, I'll see you at OCD office today at 1pm. Thanks!

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Subject: RE: W.J. Sweat Sun Federal tank battery

Everyone,

I spoke to Mike Bratcher and Henryetta Price this morning and let them know that we won't be able to meet today. We sincerely apologize for the inconvenience to you all but we want to be prepared to meaningfully discuss the Plan. Mike is familiar with the site but is not able to make the meeting because he's working on another job we thought would be done by now. I am not familiar with the site and will visit the location today to get a feel of it. I talked to the contractor today and they plan to begin removing the battery facilities tomorrow.

This week, I'll be available Wednesday, Friday, and all through next week. Let us know your availability. Again, I'm sorry for the inconvenience to you. Thank you for understanding.

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I spoke to Mike Bratcher and Henryetta Price this morning and let them know that we won't be able to meet today. We sincerely apologize for the inconvenience to you all but we want to be prepared to meaningfully discuss the Plan. Mike is familiar with the site but is not able to make the meeting because he's working on another job we thought would be done by now. I am not familiar with the site and will visit the location today to get a feel of it. I talked to the contractor today and they plan to begin removing the battery facilities tomorrow.

This week, I'll be available Wednesday, Friday, and all through next week. Let us know your availability. Again, I'm sorry for the inconvenience to you. Thank you for understanding.

Kristin Pope

R.T. Hicks Consultants

Carlsbad Field Office

575.302.6755

From: Kristin Pope [mailto:kristin@rthicksconsult.com]
Sent: Monday, October 30, 2017 7:11 AM
To: 'Weaver, Crystal, EMNRD'; 'Price, Henryetta'
Cc: 'mike@rthicksconsult.com'; 'Bratcher, Mike, EMNRD'; 'Randall Hicks'; 'BUDDY DELONG'
Subject: RE: W.J. Sweat Sun Federal tank battery

Good morning all,

Sorry to bat this around so much but Randy and Mike told me that the facility is being removed today and excavators will be starting on Wednesday. Let me know if y'all prefer a field trip to witness and plot it out on site.

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Thank you,

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

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Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

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RT Hicks Consultants

Cell: 575-365-5034

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I can do early morning Thursday (as if no later than 9:30) or late afternoon Thursday (2pm or later).

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Phone 575-234-5951

Cell 575-706-2780

Fax 575-234-5927

On Mon, Oct 30, 2017 at 10:51 AM, Kristin Pope <kristin@rthicksconsult.com> wrote:

Everyone,

I spoke to Mike Bratcher and Henryetta Price this morning and let them know that we won't be able to meet today. We sincerely apologize for the inconvenience to you all but we want to be prepared to meaningfully discuss the Plan. Mike is familiar with the site but is not able to make the meeting because he's working on another job we thought would be done by now. I am not familiar with the site and will visit the location today to get a feel of it. I talked to the contractor today and they plan to begin removing the battery facilities tomorrow.

This week, I'll be available Wednesday, Friday, and all through next week. Let us know your availability. Again, I'm sorry for the inconvenience to you. Thank you for understanding.

Kristin Pope

R.T. Hicks Consultants

Carlsbad Field Office

575.302.6755

From: Kristin Pope [mailto:kristin@rthicksconsult.com]
Sent: Monday, October 30, 2017 7:11 AM
To: 'Weaver, Crystal, EMNRD'; 'Price, Henryetta'
Cc: 'mike@rthicksconsult.com'; 'Bratcher, Mike, EMNRD'; 'Randall Hicks'; 'BUDDY DELONG'
Subject: RE: W.J. Sweat Sun Federal tank battery

Good morning all,

Sorry to bat this around so much but Randy and Mike told me that the facility is being removed today and excavators will be starting on Wednesday. Let me know if y'all prefer a field trip to witness and plot it out on site.

Otherwise, I'll see you at OCD office today at 1pm. Thanks!

Kristin Pope

R.T. Hicks Consultants

Carlsbad Field Office

575.302.6755

From: Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]

Sent: Monday, October 23, 2017 12:23 PM

To: Price, Henryetta; Kristin Pope

Cc: mike@rthicksconsult.com; Bratcher, Mike, EMNRD; Randall Hicks; BUDDY DELONG

Subject: RE: W.J. Sweat Sun Federal tank battery

Greetings all,

OCD agrees with the BLM that a meeting would be helpful for this project. If an onsite gathering is most beneficial in order to discuss then OCD should hopefully be able to arrange to attend. Mike Bratcher is out of the office right now so I will need to discuss that component with him once he returns. But, if not onsite then at least a gathering at the OCD office still at 1pm would be an ideal alternative.

As I said if meeting with you all onsite has any issues on OCD's end we will let you know.

Thank you,

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1st Street

Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

Fax: 575-748-9720

From: Price, Henryetta [<mailto:hprice@blm.gov>]

Sent: Monday, October 23, 2017 10:21 AM

To: Kristin Pope <kristin@rthicksconsult.com>

Cc: mike@rthicksconsult.com; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Randall Hicks <r@rthicksconsult.com>; BUDDY DELONG <BUDDY_DELONG@msn.com>

Subject: Re: W.J. Sweat Sun Federal tank battery

I don't have an issue with that. Just want to have us all there. Thanks.

Henryetta Price

Environmental Protection Specialist

Bureau Of Land Management

Hprice@blm.gov

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Cell 575-706-2780

Fax 575-234-5927

On Mon, Oct 23, 2017 at 10:07 AM, Kristin Pope <kristin@rthicksconsult.com> wrote:

That's fine with us. Since we'll be hauling material, we're also open to a meeting on site if you prefer.

Kristin Pope

R.T. Hicks Consultants

Carlsbad Field Office

575.302.6755

From: Price, Henryetta [mailto:hprice@blm.gov]

Sent: Monday, October 23, 2017 9:41 AM

To: mike@rthicksconsult.com

Cc: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD; Randall Hicks; Kristin Pope; BUDDY DELONG

Subject: Re: W.J. Sweat Sun Federal tank battery

All,

Can we meet next week on Monday 30 Oct at 1pm at the NMOCD office in Artesia?

Henryetta Price

Environmental Protection Specialist

Bureau Of Land Management

Hprice@blm.gov

Phone 575-234-5951

Cell 575-706-2780

Fax 575-234-5927

On Thu, Oct 19, 2017 at 1:59 PM, Mike Stubblefield <mike@rthicksconsult.com> wrote:

Dear Mr. Mike Bratcher,

Sweat Construction willing be hauling the stockpiled material which was removed from the disposal pit located at the Sun Federal tank battery to landfill. After the stockpiled material has been removed from the tank battery site, the production equipment will then be relocated to the Sun Federal No.1 well site location. I will give a verbal notice to you on time and date for haul off actions. Please contact me or Kristen Pope if further information is required.

Mike Stubblefield

RT Hicks Consultants

Cell: 575-365-5034

Bratcher, Mike, EMNRD

From: Weaver, Crystal, EMNRD
Sent: Friday, May 26, 2017 4:53 PM
To: n.larson@sweattconstruction.com
Cc: Bratcher, Mike, EMNRD; Price, Henryetta
Subject: FW: W J Sweatt * Sun Federal #1 * 30-015-05711
Attachments: Pic-001- 5-4-17.jpg; Pic-002 - 5-4-17.jpg; Pic-003 - 5-4-17.jpg; Pic-004 - 5-4-17.jpg; Pic-005 - 5-4-17.jpg; Pic-006 - 5-4-17.jpg; Pic-007 - 5-4-17.jpg; Pic-008 - 5-4-17.jpg; 2RP-3242.pdf

Hello Nancy,

I am writing to you on behalf of the Oil Conservation Division (OCD) of the State of New Mexico regarding W J Sweatt production operations of Sun Federal #1. Mike Bratcher and myself are the Environmental Specialists that work out of the OCD office here in Artesia, NM. This site is on federal land and involves federal minerals that are both managed by the Bureau of Land Management (BLM) so I have also included Henryetta Price who works out of the BLM Carlsbad Office as an Environmental Protection Specialist. I was told that instead of Buddy Delong you may be a better person to contact regarding W J Sweatt production sites. If you are the correct person to deal with this matter could you please address the email below that was originally sent to Buddy Delong (the original attachments have been affixed). If you are not the proper person to address this matter could you direct us to someone who is?

Thank you,

Crystal Weaver

Environmental Specialist
OCD – Artesia District II
811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
Cell: 575-840-5963
Fax: 575-748-9720

From: Weaver, Crystal, EMNRD
Sent: Tuesday, May 23, 2017 11:09 AM
To: buddy_delong@msn.com
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; 'Price, Henryetta' <hprice@blm.gov>; Jim Amos (jamos@blm.gov) <jamos@blm.gov>
Subject: W J Sweatt * Sun Federal #1 * 30-015-05711

Hello Buddy,

First off OCD would like to concur with the BLM on this site.

A C-144 needs to be filled out regarding the unpermitted disposal pit and a remediation proposal for the pit needs to be turned in to the OCD no later than 6/2/17. A full delineation of this site will be required so please make sure to include that within your remediation proposal.

On the C-144 the first section on page one looks similar to this:

Type of action:

- ☐ Below grade tank registration
- ☐ Permit of a pit or proposed alternative method
- ☐ Closure of a pit, below-grade tank, or proposed alternative method
- ☐ Modification to an existing permit/or registration
- ☐ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

**The fifth box of these choices needs to be marked, and following that section, all remaining areas of the form that are pertinent to this disposal pit remediation need to be filled out.

Please Note: Photos were taken by BLM on 5/4/17 of the Sun Federal #1 Tank Battery location where the unpermitted disposal pit exists, where the contaminated releases in the pasture area occurred and where dismantled equipment was left. Those and any other spill areas are to be cleaned up to OCD rules and regulations standards and because they were identified by an environmental regulatory inspector it will now be required that a C-141 be submitted for these releases so that they may be tracked within the OCD data system. As BLM Environmental Protection Specialist, Henryetta Price, mentioned both the BLM and OCD will need to be notified once remediation procedures are being mobilized with 48 hours in advance so that both regulatory parties are able to consider being present on site.

It is OCD's understanding that a pre-existing spill had occurred at the Sun Federal #1 tank battery location back in 7/2015 and was given a case number of 2RP-3242. After the OCD received the initial C-141 and its attachments no other follow up documentation or update on status of this release was provided to the OCD. I have attached the initial C-141 and the said attachments that were sent in from the operator at the time of the spill's origination. A follow up of this release is also being requested at this time.

Thank you for your cooperation and if you have any questions or concerns please contact myself or Mr. Mike Bratcher at OCD Artesia District II Office.

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1st Street

Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

Fax: 575-748-9720

From: Price, Henryetta [<mailto:hprice@blm.gov>]

Sent: Monday, May 15, 2017 4:07 PM

To: buddy_delong@msn.com

Cc: James Amos <James_Amos@blm.gov>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal,

EMNRD <Crystal.Weaver@state.nm.us>

Subject: Sun Fed Tank Batt

Buddy,

Below are my inspection remarks for the above location. Sampling will occur within the impacted area and delineated in accordance within NMOCD Guidelines. As mentioned earlier, we do not recommend dig and haul if we can address the impacts on location. This will depend on the amount of contaminants on location, depth to ground water, and proposed method. I am going to require that you give me 48 hours notice so that I am available for sampling. Thank you.

Inspection remarks:

Noticed some staining in the pasture east of the battery. Looks like a metal flow line had a leak and was fixed. No spills have been reported for that incident. Area impacted in the pasture was about 3x15ft. if not more. And another area approx. 5x8 ft in the pasture.

Cattle is present in the area. High recreation area.

Unapproved disposal pit is in use within the berm. PVC pipe runs from the open top tank into the disposal pit. No requests or approval given for the pit.

Contaminated soils and dismantled gunbarrel just outside the battery and in the pasture.

Most of the contaminants within the berm from the reported EU on 7/2/15 have been removed from within the berm and placed outside the berm area.

No analyticals have been submitted. No work plan has been submitted or approved.

Closure report not received.

Called Sweatt about the location and current contact information. They will have until the end of the week to make contact with their pumper Buddy Delong who is their contact for this clean up. Otherwise INC will be issued. Recommend to have inspector present during sampling to ensure they are reporting/ and collecting samples correctly.

Henryetta Price

Environmental Protection Specialist

Bureau Of Land Management

Hprice@blm.gov

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Fax 575-234-5927

*Please remember that Lesser Prairie Chicken timing stipulations are in effect 01 Mar- 15 June Annually

* Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.

Bratcher, Mike, EMNRD

From: Weaver, Crystal, EMNRD
Sent: Tuesday, November 7, 2017 8:02 AM
To: Bratcher, Mike, EMNRD; Kristin Pope; 'Price, Henryetta'
Cc: mike@rthicksconsult.com; 'Randall Hicks'; 'BUDDY DELONG'
Subject: RE: W.J. Sweat Sun Federal tank battery

Hello all,

How about 2:00 or 2:15pm this Thursday?

Thanks,

Crystal Weaver

Environmental Specialist
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From: Bratcher, Mike, EMNRD
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To: Kristin Pope <kristin@rthicksconsult.com>; 'Price, Henryetta' <hprice@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: mike@rthicksconsult.com; 'Randall Hicks' <r@rthicksconsult.com>; 'BUDDY DELONG' <BUDDY_DELONG@msn.com>
Subject: RE: W.J. Sweat Sun Federal tank battery

Good morning all,

I have a 1PM meeting Thursday, I would expect to go an hour, possibly a little more, Thursday morning, or after 2PM would work for me as well.

Thanks,

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

From: Kristin Pope [<mailto:kristin@rthicksconsult.com>]
Sent: Monday, November 6, 2017 9:27 PM
To: 'Price, Henryetta' <hprice@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; mike@rthicksconsult.com; 'Randall Hicks' <r@rthicksconsult.com>; 'BUDDY DELONG' <BUDDY_DELONG@msn.com>
Subject: RE: W.J. Sweat Sun Federal tank battery

I can do early morning Thursday (as if no later than 9:30) or late afternoon Thursday (2pm or later).

Kristin Pope
R.T. Hicks Consultants
Carlsbad Field Office
575.302.6755

From: Price, Henryetta [<mailto:hprice@blm.gov>]
Sent: Monday, November 06, 2017 3:35 PM
To: Weaver, Crystal, EMNRD
Cc: Kristin Pope; Bratcher, Mike, EMNRD; mike@rthicksconsult.com; Randall Hicks; BUDDY DELONG
Subject: Re: W.J. Sweat Sun Federal tank battery

I'm good with Thursday.

Henryetta Price
Environmental Protection Specialist
Bureau Of Land Management
Hprice@blm.gov
Phone 575-234-5951
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Environmental Specialist

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Subject: RE: W.J. Sweat Sun Federal tank battery

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Please let us know your availability. Thanks.

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R.T. Hicks Consultants

Carlsbad Field Office

575.302.6755

From: Price, Henryetta [<mailto:hprice@blm.gov>]

Sent: Monday, October 30, 2017 4:47 PM

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Cc: Weaver, Crystal, EMNRD; mike@rthicksconsult.com; Bratcher, Mike, EMNRD; Randall Hicks; BUDDY DELONG

Subject: Re: W.J. Sweat Sun Federal tank battery

All,

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Environmental Protection Specialist

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Subject: Re: W.J. Sweat Sun Federal tank battery

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Henryetta Price

Environmental Protection Specialist

Bureau Of Land Management

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Mike Stubblefield

RT Hicks Consultants

Cell: 575-365-5034

Bratcher, Mike, EMNRD

From: Kristin Pope <kristin@rthicksconsult.com>
Sent: Tuesday, November 7, 2017 2:19 PM
To: 'Price, Henryetta'
Cc: Weaver, Crystal, EMNRD; Bratcher, Mike, EMNRD; mike@rthicksconsult.com; 'Randall Hicks'; 'BUDDY DELONG'
Subject: RE: W.J. Sweat Sun Federal tank battery

Great! We'll see everyone then. Thanks for working this out.

Kristin Pope
R.T. Hicks Consultants
Carlsbad Field Office
575.302.6755

From: Price, Henryetta [mailto:hprice@blm.gov]
Sent: Tuesday, November 07, 2017 1:48 PM
To: Kristin Pope
Cc: Weaver, Crystal, EMNRD; Bratcher, Mike, EMNRD; mike@rthicksconsult.com; Randall Hicks; BUDDY DELONG
Subject: Re: W.J. Sweat Sun Federal tank battery

2:15 is good for me too.

Thanks.

Henryetta Price
Environmental Protection Specialist
Bureau Of Land Management
Hprice@blm.gov
Phone 575-234-5951
Cell 575-706-2780
Fax 575-234-5927

On Tue, Nov 7, 2017 at 9:36 AM, Kristin Pope <kristin@rthicksconsult.com> wrote:

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R.T. Hicks Consultants

Carlsbad Field Office

575.302.6755

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NMOCD District 2

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[Artesia, NM 88210](#)

[575](#)-748-1283 Ext 108

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Subject: RE: W.J. Sweat Sun Federal tank battery

Good morning all,

Sorry to bat this around so much but Randy and Mike told me that the facility is being removed today and excavators will be starting on Wednesday. Let me know if y'all prefer a field trip to witness and plot it out on site.

Otherwise, I'll see you at OCD office today at 1pm. Thanks!

Kristin Pope

R.T. Hicks Consultants

Carlsbad Field Office

575.302.6755

From: Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]

Sent: Monday, October 23, 2017 12:23 PM

To: Price, Henryetta; Kristin Pope

Cc: mike@rthicksconsult.com; Bratcher, Mike, EMNRD; Randall Hicks; BUDDY DELONG

Subject: RE: W.J. Sweat Sun Federal tank battery

Greetings all,

OCD agrees with the BLM that a meeting would be helpful for this project. If an onsite gathering is most beneficial in order to discuss then OCD should hopefully be able to arrange to attend. Mike Bratcher is out of the office right now so I will need to discuss that component with him once he returns. But, if not onsite then at least a gathering at the OCD office still at 1pm would be an ideal alternative.

As I said if meeting with you all onsite has any issues on OCD's end we will let you know.

Thank you,

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1st Street

Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

Fax: 575-748-9720

From: Price, Henryetta [<mailto:hprice@blm.gov>]

Sent: Monday, October 23, 2017 10:21 AM

To: Kristin Pope <kristin@rthicksconsult.com>

Cc: mike@rthicksconsult.com; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Randall Hicks <r@rthicksconsult.com>; BUDDY DELONG <BUDDY_DELONG@msn.com>

Subject: Re: W.J. Sweat Sun Federal tank battery

I don't have an issue with that. Just want to have us all there. Thanks.

Henryetta Price

Environmental Protection Specialist

Bureau Of Land Management

Hprice@blm.gov

Phone 575-234-5951

Cell 575-706-2780

Fax 575-234-5927

On Mon, Oct 23, 2017 at 10:07 AM, Kristin Pope <kristin@rthicksconsult.com> wrote:

That's fine with us. Since we'll be hauling material, we're also open to a meeting on site if you prefer.

Kristin Pope

R.T. Hicks Consultants

Carlsbad Field Office

575.302.6755

From: Price, Henryetta [mailto:hprice@blm.gov]

Sent: Monday, October 23, 2017 9:41 AM

To: mike@rthicksconsult.com

Cc: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD; Randall Hicks; Kristin Pope; BUDDY DELONG

Subject: Re: W.J. Sweat Sun Federal tank battery

All,

Can we meet next week on Monday 30 Oct at 1pm at the NMOCD office in Artesia?

Henryetta Price

Environmental Protection Specialist

Bureau Of Land Management

Hprice@blm.gov

Phone 575-234-5951

Cell 575-706-2780

Fax 575-234-5927

On Thu, Oct 19, 2017 at 1:59 PM, Mike Stubblefield <mike@rthicksconsult.com> wrote:

Dear Mr. Mike Bratcher,

Sweat Construction willing be hauling the stockpiled material which was removed from the disposal pit located at the Sun Federal tank battery to landfill. After the stockpiled material has been removed from the tank battery site, the production equipment will then be relocated to the Sun Federal No.1 well site location. I will give a verbal notice to you on time and date for haul off actions. Please contact me or Kristen Pope if further information is required.

Mike Stubblefield

RT Hicks Consultants

Cell: 575-365-5034

Bratcher, Mike, EMNRD

From: Price, Henryetta <hprice@blm.gov>
Sent: Tuesday, February 20, 2018 1:51 PM
To: Kristin Pope
Cc: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD; Randy Hicks; BUDDY DELONG
Subject: Re: UPDATE: Sweatt - Sun Fed #1

Good Afternoon Kristen,

Do you have an update for the location?

Henryetta Price

Environmental Protection Specialist
Bureau Of Land Management

[Hprice@blm.gov](mailto:hprice@blm.gov)

Phone 575-234-5951

Cell 575-706-2780

Fax 575-234-5927

On Fri, Jan 19, 2018 at 4:15 PM, Price, Henryetta <hprice@blm.gov> wrote:

Thank you Kristin.

Henryetta Price

Environmental Protection Specialist
Bureau Of Land Management

[Hprice@blm.gov](mailto:hprice@blm.gov)

Phone 575-234-5951

Cell 575-706-2780

Fax 575-234-5927

On Fri, Jan 19, 2018 at 4:02 PM, Kristin Pope <kristin@rthicksconsult.com> wrote:

A quick update regarding the Sweatt – Sun Fed #1 (2RP-4449) location:

Last week we found the lateral extent of impact (using visual observations and chloride field tests) from each direction of the existing 77 x 28 excavated pit. The eastern side was already extended significantly to allow for deeper delineation last year and the southern edge was extended 10 ft south. Each sample was submitted for lab analyses of BTEX, TPH, and CI and we are waiting on results.

Also at that time, vertical delineation was conducted at the former open-top tank, at the location where the heater-treater spill occurred, and at an area of impact outside of the southern fence of the location where a historic spill occurred. The deepest of each of these samples were also submitted to the lab.

The pit excavation walls were squared and evened to 77 x 38 x 4-ft-deep. When lab results confirm that we have found the lateral extent in these dimensions, we will extend each wall 2 more feet laterally as specified in our approved plan and place a liner over the entire excavation.

The excavated spoils have been separated into two categories of visually-impacted and soil that appears (and smells) clean. We collected a composite sample of the "dirty" spoils this week and also submitted it to the lab so that we can determine its disposition or suitability for backfill or cover.

We will continue to notify you of any progress. If you have any questions, please don't hesitate to contact me. Thanks.

Kristin Pope

R.T. Hicks Consultants

Carlsbad Field Office

575.302.6755

Bratcher, Mike, EMNRD

From: Kristin Pope <kristin@rthicksconsult.com>
Sent: Wednesday, February 21, 2018 8:54 PM
To: 'Price, Henryetta'
Cc: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD; 'Randy Hicks'; 'BUDDY DELONG'
Subject: RE: UPDATE: Sweatt - Sun Fed #1

Henryetta,

I apologize to everyone for the delay. I noticed the lab was taking extraordinarily long with the results and found out I was left out of the email list. Then when I tried to log in to our account, the report wasn't showing up for me. I worked it out with the lab last week and we found the report.

DRO at the release area south of the location was high at 6 ft BGS and needs deeper samples. We will also continue lateral delineation of the former pit in the northern direction for DRO. Mike S. has contacted the excavation contractor who put in the one-call on Tuesday; as soon as this work is scheduled, we'll notify everyone. I expect this work to take no more than one day.

Please contact me with any questions. Thanks.

Kristin Pope
R.T. Hicks Consultants
Carlsbad Field Office
575.302.6755

From: Price, Henryetta [mailto:hprice@blm.gov]
Sent: Tuesday, February 20, 2018 1:51 PM
To: Kristin Pope
Cc: Mike Bratcher; Crystal Weaver; Randy Hicks; BUDDY DELONG
Subject: Re: UPDATE: Sweatt - Sun Fed #1

Good Afternoon Kristen,

Do you have an update for the location?

Henryetta Price
Environmental Protection Specialist
Bureau Of Land Management
Hprice@blm.gov
Phone 575-234-5951
Cell 575-706-2780
Fax 575-234-5927

On Fri, Jan 19, 2018 at 4:15 PM, Price, Henryetta <hprice@blm.gov> wrote:
Thank you Kristin.

Henryetta Price

Environmental Protection Specialist

Bureau Of Land Management

[Hprice@blm.gov](mailto:hprice@blm.gov)

Phone 575-234-5951

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On Fri, Jan 19, 2018 at 4:02 PM, Kristin Pope <kristin@rthicksconsult.com> wrote:

A quick update regarding the Sweatt – Sun Fed #1 (2RP-4449) location:

Last week we found the lateral extent of impact (using visual observations and chloride field tests) from each direction of the existing 77 x 28 excavated pit. The eastern side was already extended significantly to allow for deeper delineation last year and the southern edge was extended 10 ft south. Each sample was submitted for lab analyses of BTEX, TPH, and Cl and we are waiting on results.

Also at that time, vertical delineation was conducted at the former open-top tank, at the location where the heater-treater spill occurred, and at an area of impact outside of the southern fence of the location where a historic spill occurred. The deepest of each of these samples were also submitted to the lab.

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We will continue to notify you of any progress. If you have any questions, please don’t hesitate to contact me. Thanks.

Kristin Pope

R.T. Hicks Consultants

Carlsbad Field Office

575.302.6755



☼ 314°NW (T) ● 32°38'36"N, 103°53'45"W ±13.1ft ▲ 3425ft

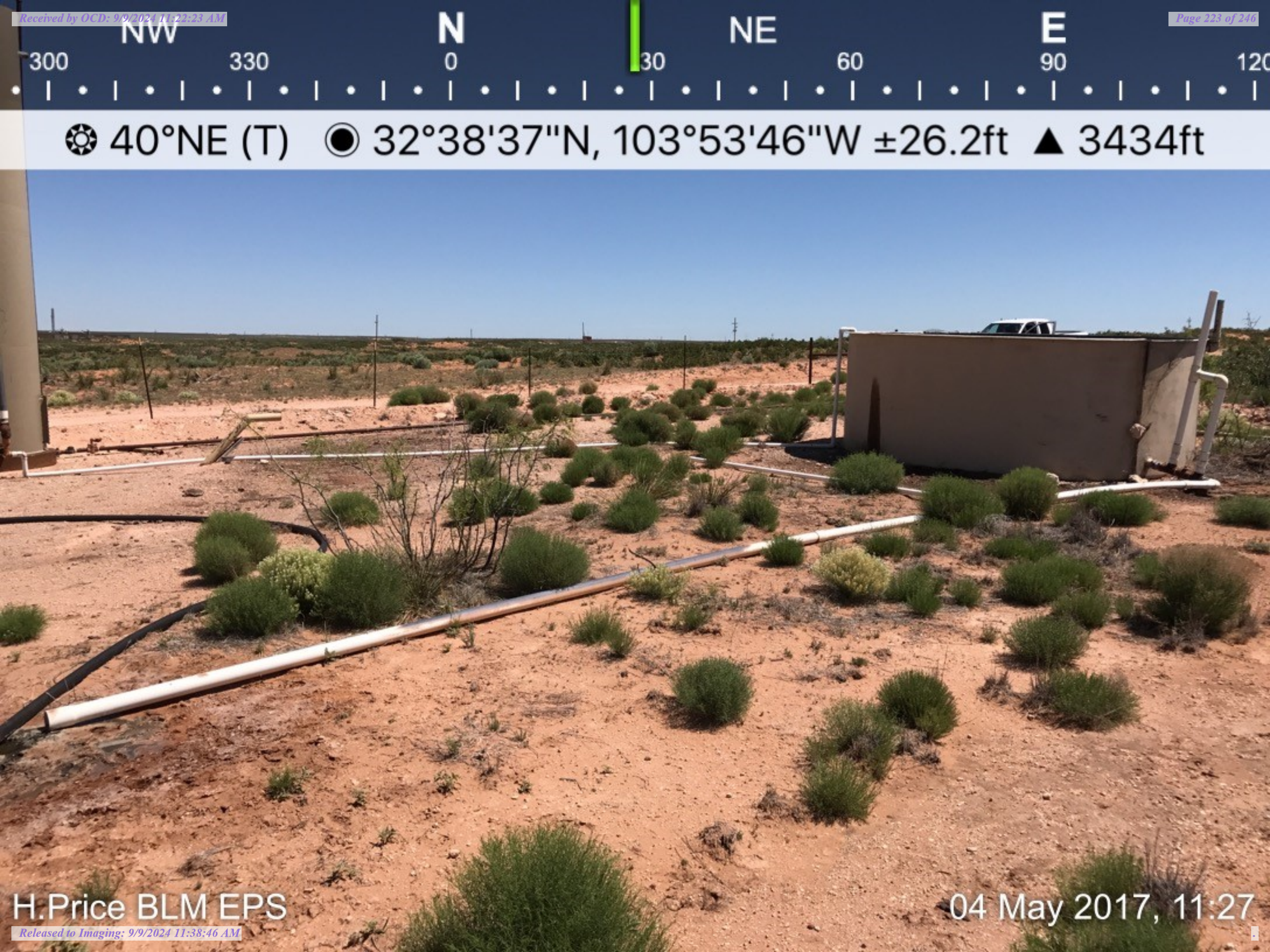




☼ 235°SW (T) ● 32°38'36"N, 103°53'45"W ±26.2ft ▲ 3425ft







☀ 40°NE (T) ● 32°38'37"N, 103°53'46"W ±26.2ft ▲ 3434ft



☀ 40°NE (T) ● 32°38'37"N, 103°53'46"W ±26.2ft ▲ 3434ft



☼ 358°N (T) ● 32°38'36"N, 103°53'46"W ±39.4ft ▲ 3396ft



SW

W

NW

N

210

240

270

300

330

0

30

☼ 308°NW (T) ● 32°38'36"N, 103°53'46"W ±19.7ft ▲ 3423ft



H.Price BLM EPS

04 May 2017, 11:26

SW

W

NW

N

210

240

270

300

330

0

☀ 294°NW (T) ● 32°38'36"N, 103°53'46"W ±19.7ft ▲ 3423ft



Bratcher, Mike, EMNRD

From: Weaver, Crystal, EMNRD
Sent: Tuesday, May 30, 2017 8:44 AM
To: Bratcher, Mike, EMNRD
Subject: FW: FW: W J Sweatt * Sun Federal #1 * 30-015-05711

Nancy sent me this... Guess we ask Buddy what is up once he gets here in a bit.

From: Nancy Larson [mailto:n.larson@sweattconstruction.com]
Sent: Tuesday, May 30, 2017 8:04 AM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Subject: Re: FW: W J Sweatt * Sun Federal #1 * 30-015-05711

Actually Mr. DeLong is the pumper on this well. I am Mr. Sweatt's employee but I work in the construction office. I have been doing his production reporting for years, but Mr. Delong should be the one to deal with on this issue.

Thanks and have a great day!

On Fri, May 26, 2017 at 4:53 PM, Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us> wrote:

Hello Nancy,

I am writing to you on behalf of the Oil Conservation Division (OCD) of the State of New Mexico regarding W J Sweatt production operations of Sun Federal #1. Mike Bratcher and myself are the Environmental Specialists that work out of the OCD office here in Artesia, NM. This site is on federal land and involves federal minerals that are both managed by the Bureau of Land Management (BLM) so I have also included Henryetta Price who works out of the BLM Carlsbad Office as an Environmental Protection Specialist. I was told that instead of Buddy Delong you may be a better person to contact regarding W J Sweatt production sites. If you are the correct person to deal with this matter could you please address the email below that was originally sent to Buddy Delong (the original attachments have been affixed). If you are not the proper person to address this matter could you direct us to someone who is?

Thank you,

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1st Street

Artesia, NM 88210

Office: [575-748-1283 ext. 101](tel:575-748-1283)

Cell: [575-840-5963](tel:575-840-5963)

Fax: [575-748-9720](tel:575-748-9720)

From: Weaver, Crystal, EMNRD

Sent: Tuesday, May 23, 2017 11:09 AM

To: buddy_delong@msn.com

Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; 'Price, Henryetta' <hprice@blm.gov>; Jim Amos
(jamos@blm.gov) <jamos@blm.gov>

Subject: W J Sweatt * Sun Federal #1 * 30-015-05711

Hello Buddy,

First off OCD would like to concur with the BLM on this site.

A C-144 needs to be filled out regarding the unpermitted disposal pit and a remediation proposal for the pit needs to be turned in to the OCD no later than 6/2/17. A full delineation of this site will be required so please make sure to include that within your remediation proposal.

On the C-144 the first section on page one looks similar to this:

Type of action:

- *Below grade tank registration*
- *Permit of a pit or proposed alternative method*
- *Closure of a pit, below-grade tank, or proposed alternative method*
- *Modification to an existing permit/or registration*

- Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

**The fifth box of these choices needs to be marked, and following that section, all remaining areas of the form that are pertinent to this disposal pit remediation need to be filled out.

Please Note: Photos were taken by BLM on 5/4/17 of the Sun Federal #1 Tank Battery location where the unpermitted disposal pit exists, where the contaminated releases in the pasture area occurred and where dismantled equipment was left. Those and any other spill areas are to be cleaned up to OCD rules and regulations standards and because they were identified by an environmental regulatory inspector it will now be required that a C-141 be submitted for these releases so that they may be tracked within the OCD data system. As BLM Environmental Protection Specialist, Henryetta Price, mentioned both the BLM and OCD will need to be notified once remediation procedures are being mobilized with 48 hours in advance so that both regulatory parties are able to consider being present on site.

It is OCD's understanding that a pre-existing spill had occurred at the Sun Federal #1 tank battery location back in 7/2015 and was given a case number of 2RP-3242. After the OCD received the initial C-141 and its attachments no other follow up documentation or update on status of this release was provided to the OCD. I have attached the initial C-141 and the said attachments that were sent in from the operator at the time of the spill's origination. A follow up of this release is also being requested at this time.

Thank you for your cooperation and if you have any questions or concerns please contact myself or Mr. Mike Bratcher at OCD Artesia District II Office.

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1st Street

Artesia, NM 88210

Office: [575-748-1283 ext. 101](tel:575-748-1283)

Cell: [575-840-5963](tel:575-840-5963)

Fax: [575-748-9720](tel:575-748-9720)

From: Price, Henryetta [<mailto:hprice@blm.gov>]

Sent: Monday, May 15, 2017 4:07 PM

To: buddy_delong@msn.com

Cc: James Amos <James_Amos@blm.gov>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Subject: Sun Fed Tank Batt

Buddy,

Below are my inspection remarks for the above location. Sampling will occur within the impacted area and delineated in accordance within NMOCD Guidelines. As mentioned earlier, we do not recommend dig and haul if we can address the impacts on location. This will depend on the amount of contaminants on location, depth to ground water, and proposed method. I am going to require that you give me 48 hours notice so that I am available for sampling. Thank you.

Inspection remarks:

Noticed some staining in the pasture east of the battery. Looks like a metal flow line had a leak and was fixed. No spills have been reported for that incident. Area impacted in the pasture was about 3x15ft. if not more. And another area approx. 5x8 ft in the pasture.

Cattle is present in the area. High recreation area.

Unapproved disposal pit is in use within the berm. PVC pipe runs from the open top tank into the disposal pit. No requests or approval given for the pit.

Contaminated soils and dismantled gunbarrel just outside the battery and in the pasture.

Most of the contaminants within the berm from the reported EU on 7/2/15 have been removed from within the berm and placed outside the berm area.

No analyticals have been submitted. No work plan has been submitted or approved.

Closure report not received.

Called Sweatt about the location and current contact information. They will have until the end of the week to make contact with their pumper Buddy Delong who is their contact for this clean up. Otherwise INC will be

issued. Recommend to have inspector present during sampling to ensure they are reporting/ and collecting samples correctly.

Henryetta Price

Environmental Protection Specialist

Bureau Of Land Management

Hprice@blm.gov

Phone [575-234-5951](tel:575-234-5951)

Cell [575-706-2780](tel:575-706-2780)

Fax [575-234-5927](tel:575-234-5927)

*Please remember that Lesser Prairie Chicken timing stipulations are in effect 01 Mar- 15 June Annually

* Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.

--

Nancy Larson

CFO

Sweatt Construction, Inc.

P.O. Box 827

Artesia, NM 88211-0827

Phone: 575-748-1238

Fax: 575-748-1230

Bratcher, Mike, EMNRD

From: Price, Henryetta <hprice@blm.gov>
Sent: Tuesday, May 30, 2017 2:01 PM
To: Weaver, Crystal, EMNRD
Cc: n.larson@sweattconstruction.com; Bratcher, Mike, EMNRD
Subject: Re: FW: W J Sweatt * Sun Federal #1 * 30-015-05711

Good Afternoon,

I was able to talk with the pumper who did say that he will shut off the valve going to the disposal pit. I also requested samples and for the pit to be closed in accordance with NMOCD regulations and guidelines. Clean up of the fire has not been completed. At the time of inspection I needed prompt action to address the pit and contaminants and debris on location. In addition to the those findings, the two releases (or possibly one) in the pasture, was not reported to BLM. All spills or releases off location needs to be reported to BLM when tied to a BLM lease or on BLM surface via sundry form 3160-5.

At this time, I will need for clean up to commence and completed within 30 days. Failure to do so will result in a Written Order. Failure to comply with the Written Order will result in an Incidents of Non Compliance. Pit closure will require sample results and 48 hour notice for sampling.

Please do not hesitate to contact me if you have any questions or issues.

Henryetta Price

Environmental Protection Specialist

Bureau Of Land Management

[Hprice@blm.gov](mailto:hprice@blm.gov)

Phone 575-234-5951

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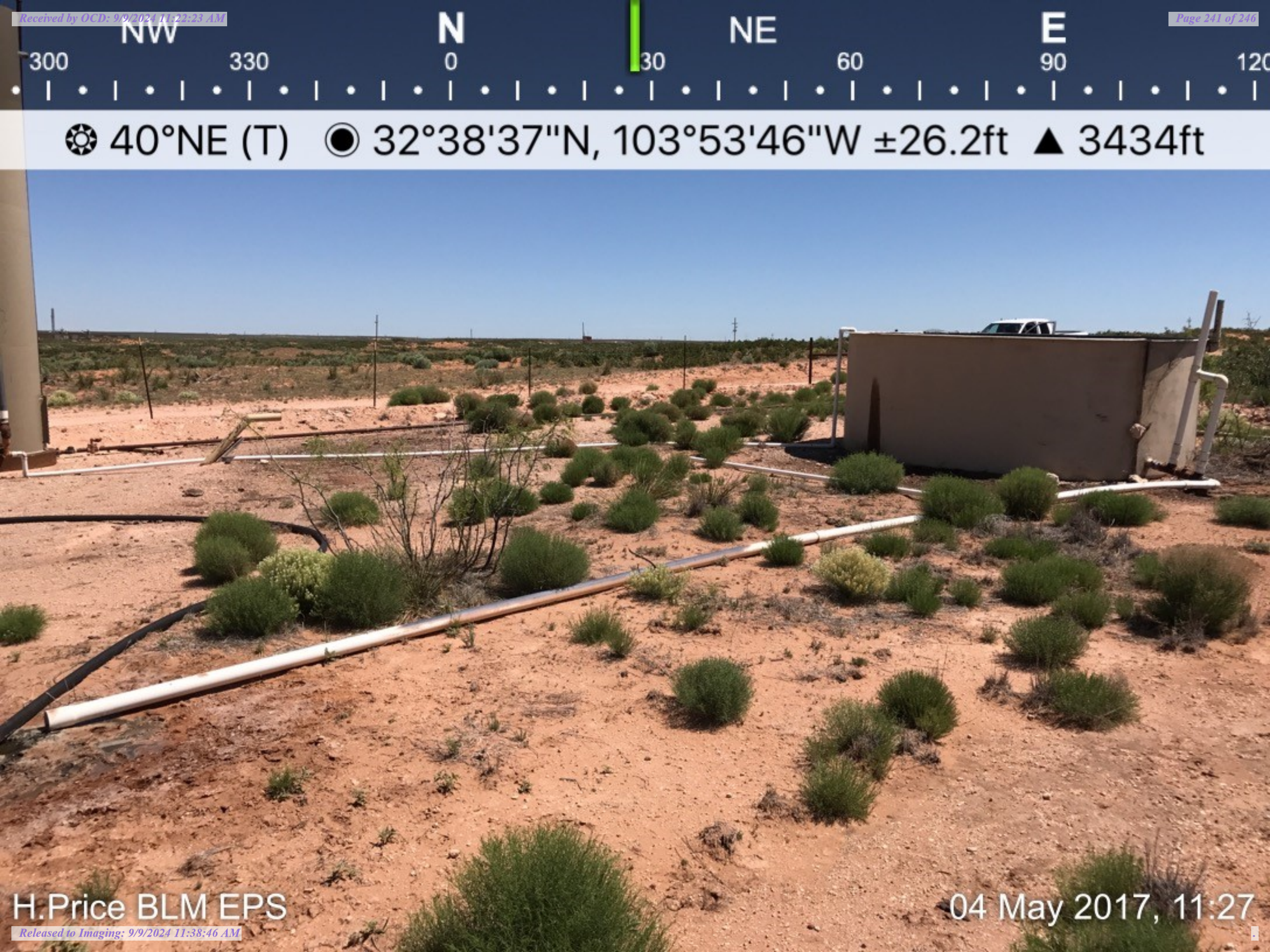




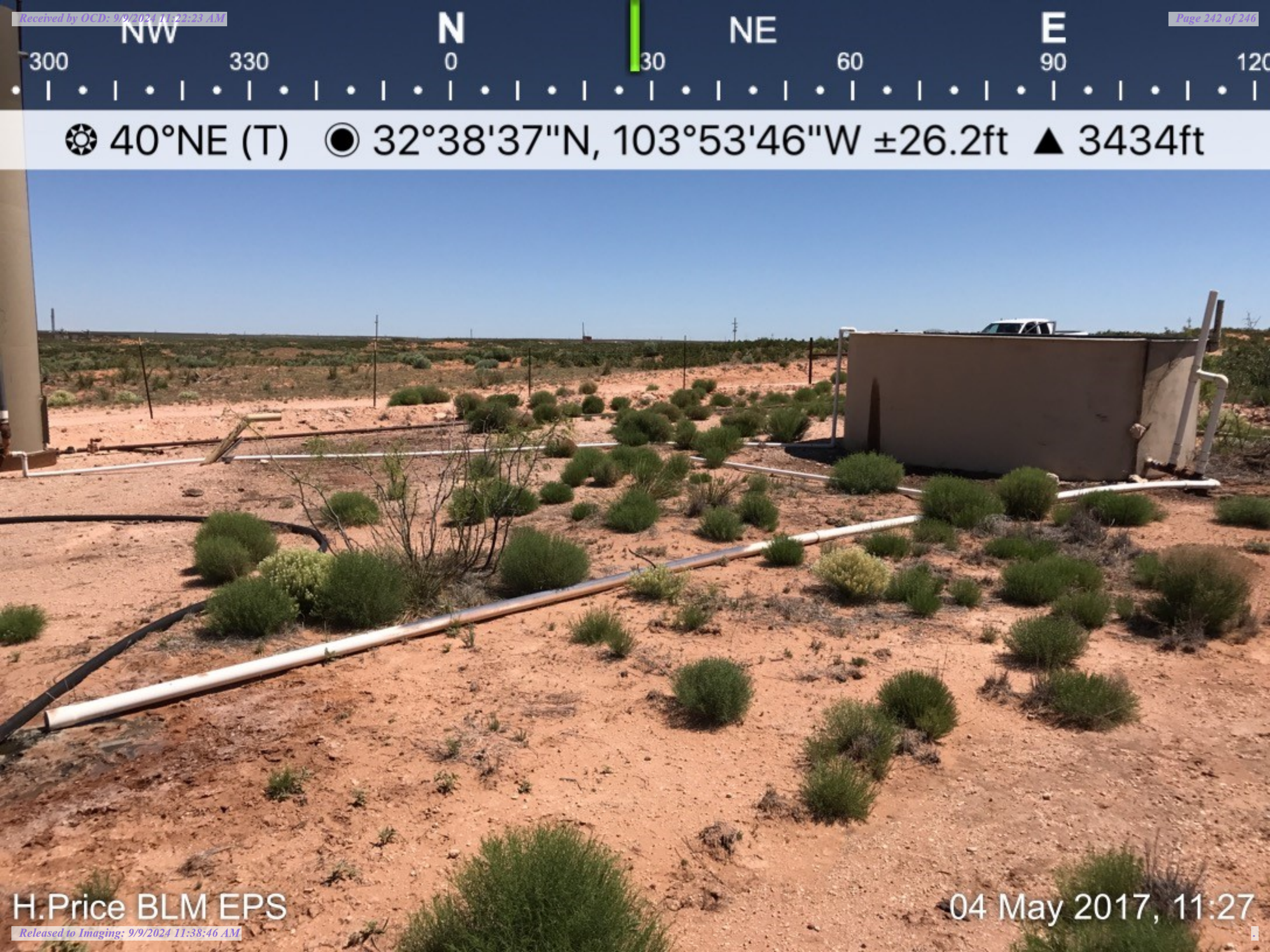
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SW

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District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 381668

CONDITIONS

Operator: W J SWEATT P.O. Box 827 Artesia, NM	OGRID: 24375
	Action Number: 381668
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	Historical document upload.	9/9/2024